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tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

Lleve esta demanda a un abogado inmediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio. Vaya en persona o llame por teléfono a la oficina cuya dirección se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.

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**IN THE COURT OF COMMON PLEAS OF PHIALDEPHIA COUNTY
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
COMMERCE PROGRAM**

LAMB MCERLANE PC
BY: JOSEPH R. PODRAZA, JR., ESQUIRE
WILLIAM H. TRASK, ESQUIRE
Attorney I.D. Nos. 53612/318229
One South Broad Street – Suite 1500
Philadelphia, PA 19107
(215) 609-3170
(610) 430-8000

KLINE & SPECTER, P.C., :
1525 Locust Street :
Philadelphia, PA 19102, :
Plaintiff, :

v. :

THOMAS E. BOSWORTH, :
1511 Latona Street :
Philadelphia, PA 19146, :

-And- :

BOSWORTH LAW, :
1511 Latona Street :
Philadelphia, PA 19146, :
Defendants. :

**IN THE COURT OF COMMON
PLEAS OF PHILADELPHIA
COUNTY**

March Term 2023

No. _____

PLAINTIFF’S COMPLAINT – BOSWORTH II

(Defamation, Commercial Disparagement, Wrongful Solicitation and Harassment)

Plaintiff, Kline & Specter, P.C. (“Firm”), by and through its undersigned attorneys, brings this action—*Bosworth II*—for defamation, commercial disparagement, wrongful solicitation and harassment against Defendants, Thomas E. Bosworth (“Mr. Bosworth”) and Bosworth Law, and in support thereof, avers as follows:

INTRODUCTION

1. This action arises out of statements concerning the Firm published by Mr. Bosworth, a former employee of the Firm, on social media with the intent to weaponize his considerable social media presence and incite the furor of his online followers to wreak violence, bigotry and operational and economic havoc on the Firm, its partners and employees.

2. The actionable statements by Mr. Bosworth, detailed herein, are laden with false claims, antisemitic tropes and encouragement of violence, hatred, bigotry and economic and physical destruction, and were published with disregard for the falsity of his accusations, the stellar reputation of the Firm, and the safety of the Firm's employees.

3. These premeditated, false attacks and vile resort to bigotry by Mr. Bosworth not only damaged the business reputation of the Firm, but exposed and currently expose the Firm and its more than 170 attorneys and staff to extremist, antisemitic rhetoric and threats of violence.

4. Mr. Bosworth's actionable social media postings were seen on his various social media platforms, not just by individuals in the greater Philadelphia area where the Firm is based, but throughout the United States and across the world.

5. Mr. Bosworth's actionable statements have tarnished the reputation of the Firm resulting in financial losses. Far more importantly, Mr. Bosworth has intentionally incited and explicitly encouraged threats of violence and death against the Firm and its staff.

PARTIES

6. Plaintiff, Kline & Specter, P.C., is a preeminent law firm in the United States concentrating in catastrophic injury litigation. The Firm maintains a business address located at 1525 Locust Street, Philadelphia, PA 19102.

7. Defendant, Thomas E. Bosworth, is an adult citizen, former employee of the Firm and resident of Pennsylvania who resides at 1511 Latona Street, Philadelphia Pennsylvania 19146, and is a lawyer licensed to practice in the Commonwealth of Pennsylvania.

8. Defendant, Bosworth Law, is the name under which Bosworth is practicing law since his discharge from the Firm, and is located in Philadelphia.

9. At all times relevant and material hereto, Mr. Bosworth was acting in his capacity as an agent of Bosworth Law and was authorized by Bosworth Law to make the actionable statements herein described.

JURISDICTION AND VENUE

10. Jurisdiction and venue are proper as to Defendants in the Court of Common Pleas of Philadelphia County inasmuch as Defendants purposefully directed harm at the Firm in Philadelphia County, Pennsylvania; the Firm was damaged in Philadelphia County, Pennsylvania; Mr. Bosworth resides and works in Philadelphia County, Pennsylvania; Bosworth Law maintains a principal place of business in Philadelphia County, Pennsylvania; and the Firm's principal place of business is located in Philadelphia County, Pennsylvania.

FACTS

11. From April 2017 until November 18, 2022, Mr. Bosworth was employed as an attorney by the Firm subject to an Employment Agreement, a true and correct copy of which is attached as Exhibit "A."

12. On November 18, 2022, Mr. Bosworth's employment with the Firm was terminated, culminating in litigation—*Bosworth I*—between Mr. Bosworth, Bosworth Law, and the Firm over Mr. Bosworth's multiple violations of his Employment Agreement, ethical misconduct and professional misconduct during his employment at the Firm, violations of post-

employment obligations and duties owed to the Firm to the detriment of the Firm’s clients, dishonesty, breaches of trust, and interferences with the administration of justice.

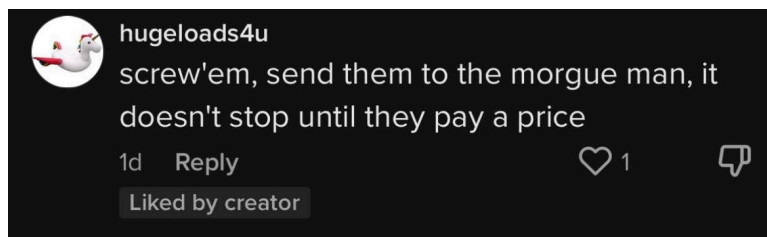
13. The litigation by the Firm against Mr. Bosworth and Bosworth Law was commenced in December 2022 and is ongoing in the Court of Common Pleas of Philadelphia County, Pennsylvania under the caption *Kline & Specter, P.C. v. Bosworth, et al.*, Commerce Court Division, December 2022 Term, No. 02513 (“*Bosworth I*” or “Employment Litigation”).

14. On February 3, 2023, the *Legal Intelligencer*, the oldest daily law journal published in the United States, published an article regarding a filing by a law firm accusing Mr. Bosworth of flagrant deposition misconduct and fabrication of evidence while employed at the Firm.

15. After the February 3 article was published by the *Legal Intelligencer*, Mr. Bosworth lashed out online, weaponizing his status as a lawyer and considerable social media presence against the Firm, his former employer, to harass, intimidate and threaten and cause physical and economic harm to its more than 170 attorneys and staff.

16. As discussed in greater detail below, Mr. Bosworth’s social media postings, including antisemitic tropes, false claims and decontextualized exaggerations, instigated numerous public threats of violence and death, digital attacks against the Firm, and antisemitic and other hateful comments against the Firm and its founding partners.

17. Mr. Bosworth even “liked” – endorsed – a death threat against the members of the Firm, one of the retaliatory threats incited by his actionable misconduct herein described.



A. Mr. Bosworth's Social Media Presence

18. At all times relevant hereto, Mr. Bosworth has maintained a significant social media presence where he markets himself as Bosworth Law on social media sites including TikTok, a platform on which he has 171,400 followers and where his postings have collectively generated 30 million views and 2.6 million “likes.”

19. On this platform, Mr. Bosworth regularly posts publicly accessible videos aimed at acquiring personal injury clients across the country from as wide an audience as possible.

20. Mr. Bosworth's TikTok account can be found at <https://www.tiktok.com/@tommythelawyer>.

21. In addition, Mr. Bosworth also posts his TikTok videos to his Instagram page, marketing both himself and Bosworth Law under the handle @lawyertombosworth, which can be found at <https://www.instagram.com/lawyertombosworth>.

22. As of this writing, Mr. Bosworth's Instagram page contains 419 posts and has 1,971 followers, and is also a public site where his videos can be viewed by any of Instagram's estimated 1.3 billion account holders.

23. At all relevant times, Mr. Bosworth has regularly posted about various legal topics, aware that if he targets an individual or conduct through his social media platforms, his many followers will learn of it and react *en masse*.

24. Mr. Bosworth's social media publications are designed to provoke reactions from among his thousands of followers.

B. Mr. Bosworth's Social Media Attacks on Firm

25. Following publication of the discussed February 3 article, and no longer focused merely on client generation, Bosworth exploited his substantial social media presence to incite

public rage and economic harm against the Firm and its founders by disseminating untrue and incomplete representations.

26. Reacting to the February 3 publication, Bosworth posted a lyric from virulent antisemite Ye (formerly known as Kanye West), falsely suggesting the Firm is controlling the media to make untrue false statements critical of him.



27. Mr. Bosworth’s selection of lyrics by Ye in the posting was deliberate.

28. The Anti-Defamation League has documented numerous antisemitic incidents in the last six months referencing Ye’s comments, including over social media. “*Ye is Right*” *Antisemitic Campaign Continues*, Anti-Defamation League (<https://www.adl.org/resources/blog/ye-right-antisemitic-campaign-continues>).

29. Over the few days that followed, Mr. Bosworth's social media attacks on the Firm escalated.

30. Mr. Bosworth posted a series of harshly critical video and false monologues on TikTok and Instagram titled "Greed," "Greed (Part 2)," and "Greed (Episode 2)."

31. As with his intentional posting of lyrics authored by a notorious antisemite, Bosworth's use of the term "Greed" in the titles of his TikTok and Instagram monologues is another deliberate reference to an antisemitic stereotype. *See* "Stereotypes of Jews," *Wikipedia*, https://en.wikipedia.org/wiki/Stereotypes_of_Jews.

32. Mr. Bosworth's initial "Greed" TikTok posting received over one million views, and until February 28, all three postings remained publicly accessible.

33. The first and third TicTok videos were also posted on Instagram, where they also remained publicly available until February 28, 2023.

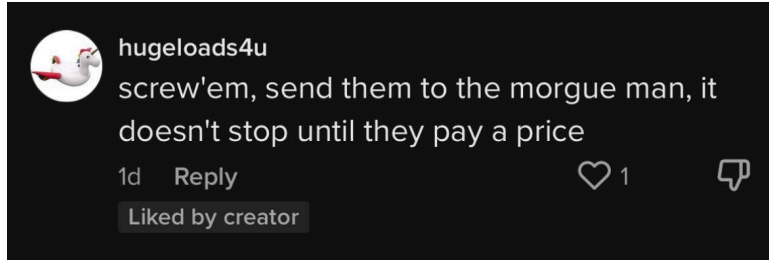
34. The thrust of the three TikTok videos is essentially the same: the Firm is solely committed to making money without regard to the interests of others.

35. Mr. Bosworth argues this premise by vigorously and falsely asserting the Firm wrongfully withheld from him access to a former client's file with dire consequences to the former client and unethically contacted multiple clients by telephone and e-mail to seek to continue representing them after being told the clients had elected to retain Mr. Bosworth as their counsel (more false representations).

36. As of the filing of this pleading, Mr. Bosworth's TikTok monologues have been viewed nearly 1.2 million times and commented on thousands of times.

37. Agitated and emboldened by Mr. Bosworth’s false claims and inciting innuendos against the Firm, his followers have harassed and threatened the Firm and its staff with violence and death.

38. One such post threatened, “screw’em, send them to the morgue man, it doesn’t stop until they pay a price.”

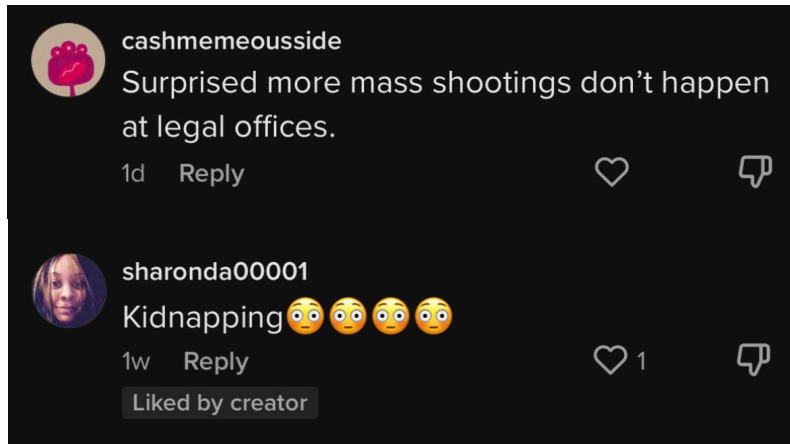


39. Another post threatened “to walk into the Kline and Spector [sic] office and start smacking the ever-loving gob-stopping SH!T outta the partners!!”

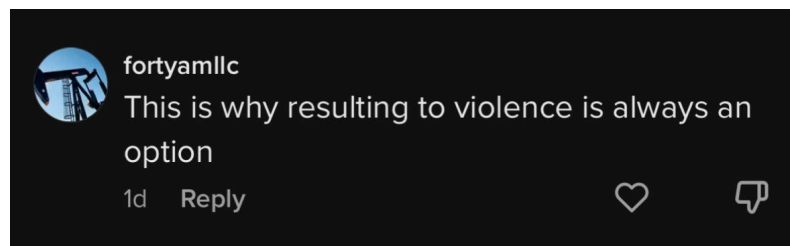


40. Another poster urged, “Let’s go Tom!! Take these scumbags behind the ol’ woodshed!,” while another frightening post expressed “[s]urprise [that] more mass shootings don’t happen at legal offices,” and another simply said: “Kidnapping [emojis].” The Kidnapping post was also “liked” by Mr. Bosworth.



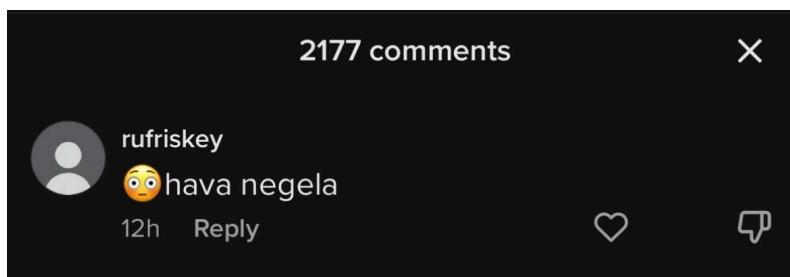


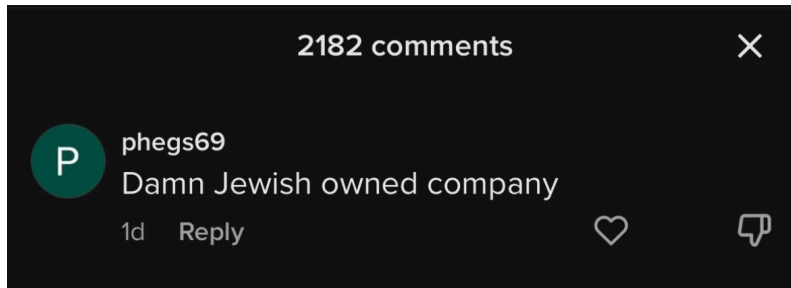
41. And threats of violence against the firm incited by Mr. Bosworth’s videos continue: as recently as approximately February 24, 2023, one of Mr. Bosworth’s followers menacingly observed, “This is why resulting [sic] to violence is always an option.”



42. Mr. Bosworth’s monologues have also stoked outbursts of racial and religious hatred against the Firm and its staff.

43. One post included “[emoji]hava negela [sic].” Another states “Damn Jewish owned company.”



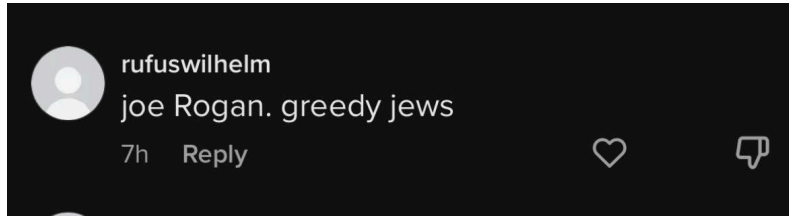
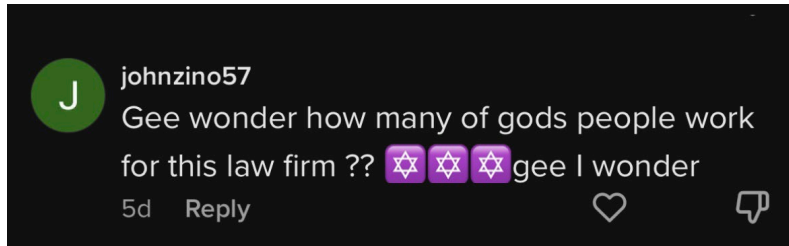


44. A different follower posted “Jewish?,” while another asked, “Were they joowish?,” and yet another claimed, “Jewish behav[ior].”



45. One of Mr. Bosworth’s followers posted, “Curious, was that lawyer a ZioNazi? Do they have an Israeli passport? [emoji],” another post states, “Gee wonder how many of gods people work for this law firm?? [3 Star of David emojis] gee I wonder,” and yet another of Bosworth’s followers posted simply, “greedy jews.”





46. And these racist and antisemitic attacks have continued throughout the weeks since Bosworth posted his first video, with followers posting as recently as February 25, 2023, “J’s being J’s,” “Sounds about Whyte. Keep up the good work Sir,” and “we’re [sic] they Berg or Goldstein?”



47. Mr. Bosworth’s monologues also inspired dozens of his followers to post poor reviews about the Firm and to flood the Firm’s Inbox with fake inquiries to “ruin” the company through reviews, and to digitally attack the Firm.

48. The Firm’s social media sites quickly came under attack following Mr. Bosworth’s social media postings, and the Firm’s previously stellar Google rating was compromised by spam ratings.

49. A follower of Mr. Bosworth exhorted, “Everyone go[] to Klein and Spectre [sic] and giving them shit reviews bringing their services to 1 star lol. go!!,” while other posts encouraged Mr. Bosworth to “name drop your former firm so other people can boycott them.”



rahyiu

Everyone going to Klein and Spectre and giving them shit reviews bringing their services to 1 star lol. go!!

2d Reply



kyleeichin

Sounds like you should name drop your former firm so other people can boycott them

2d Reply



50. Separately, a poster incited by the TikTok videos in question tells Mr. Bosworth that “I hope this goes viral and other current clients realize how unethical they really are and move their business (hopefully to you [Bosworth]!),” while another follower posted “Hello Tom ... I emailed your old firm & let them know how disgusting they are!!!!”






ttrobe




I hope this goes viral and other current clients realize how unethical they really are and move their business (hopefully to you!)




5h Reply



 sharpejeff
Hello Tom.... I emailed your old firm & let them know how disgusting they are!!!!
19h Reply  




51. Followers likewise posted “Let’s digitally attack the owners of this fine establishment [emoji],” “anyone have the Yelp URL for the law firm that was being unethical?,” and another follower further posted “Would be a real shame if their inbox was flooded with fake requests wouldn’t it ... <https://www.klinespecter.com/contact.html>.”




 mackenziejohn0
Let’s digitally attack the owners of this fine establishment 🤔
2d Reply  




 coderize
Anyone have the Yelp URL for the law firm that was being unethical?
2d Reply  1 
Liked by creator


 captainsquared
Would be a real shame if their inbox was flooded with fake requests wouldn’t it...
<https://www.klinespecter.com/contact.html>
2d Reply  




52. Other posts stimulated by Mr. Bosworth’s social media postings declare, “Kline and Specter PC lets give them some reviews people;” “Cancel Klein [sic] and Specter;” “Search .Kline & Specter, PC and give 1 star review. 100’s of plp hav in the last few days;” “Ruin this firm;” and “I made a comment of google review. Pls do same plp. Give the firm bad review.”

 **figstter**
Kline and Specter PC lets give them some reviews people
1d Reply  




 **itsk1llacam**
Cancel Klein and Specter
8h Reply  


















 **clarebella2022**
Search. Kline & Specter, PC and give 1 star review. 100's of plp hav in the last few days.
17h Reply  

 **404losernotfound**
Ruin this firm!
22h Reply  






















 **wudntuliketono**
I made a comment of google review. Pls do same plp. Give the firm bad review
2d Reply  




















53. Bosworth's false statements have spawned a relentless attack by his online followers against the Firm's law practice, reputation, and physical safety.

























 **shesfyne_**
I think we can all check off Kline and Specter from ever possibly representing us.
2-7 Reply  258 

-  **thomas560_71**
People should leave a link to this on Kline and Spectre's google reviews. Seems' they fired a darn good lawyer.
7h Reply  
-  **dlowsinger**
Turn the tables, paralyze the firm
2-8 Reply  3 
-  **jackdaddydiesel**
Put their name on blast so nobody hires them
2-7 Reply  
-  **305whatever**
Jail jail jail for your former employer
3d Reply  
-  **dathmeebols**
 never use Kline and Specter 
6d Reply  
-  **eawoodlee**
 Kline and Specter soon going to find out the power TikTok!   
1w Reply  
-  **vintvon**
uhh sounds like a bribe to ruin your case
2-14 Reply  





-  **tiffanyrichards1**
never hire kline and spectre
2-12 Reply  
-  **mr_sgin_tgai_spock**
Kline & Spector r History 😊
2-9 Reply  
-  **sr.30pack_pb**
take that bar card
2-8 Reply  
-  **patrickaguilera67**
Good on you for name dropping the firm.
Drag them!
2-7 Reply  
-  **1play_hard**
Keep exposing keep reposting keep the faith
2-7 Reply  
-  **findingdorie3**
got it. don't use kline and spector!
#efthemcommercials
2-8 Reply  1 
-  **king_kunta_mw**
I wonder what that firms google reviews look
like now 😂
2-7 Reply  1 
-  **angiebragg2002**
I hope they never get another client.
2-7 Reply  1 

























-  **linhco267**
Thanks for calling them out, I know where I'm not hiring if I need a lawyer!
2-7 Reply  1 
-  **black.heralds**
Sounds like they should be getting some bad reviews, and a filing with the BBB.
2-7 Reply  1 
-  **aliciatruman855**
I applaud you for naming the scumbags. 🥰🥰
2-7 Reply  1 
-  **patigras**
Sounds like they need 100 1 star reviews. Kline & Specter in Philly. Tik Tok do your thing
2-7 Reply  1 
-  **gianndee**
He said Kline & Specter loud and clear 😂
2-7 Reply  1 
-  **cherrykeystone**
Philly Paralegal here 👩
👉 don't 👉 work 👉 for 👉 Kline 👉 and 👉 Specter 👉
2-7 Reply  1 
-  **benjaminkicksass**
What's the name of the firm so nobody will work with them??
2-7 Reply  1 





















-  **real_babayaga_**
Probably got fired cause he wouldn't do some shady stuff for the firm. Glad your client stayed with you.
2-6 Reply  1 
-  **frankygotsdank**
Everyone call Klein and specter everyday every hr
2d Reply  
-  **nova_mov**
As a PA resident I would never work with them
2d Reply  
-  **dareyou30**
Wow, Kline and Spector sucks!!! See their advertising all the time. Good to know.
3d Reply  
-  **blakraylancer**
Not surprised a firm with Specter in the name was crossing lines 😂
3d Reply  
-  **zianniteanah1**
I will NEVER call them. They are wicked and clearly doesn't care about there clients just money. Thanks for sharing
3d Reply  
-  **sleep66**
((make note to self)) never use and tell everyone not to use Kline and Specter for any business if they need a lawyer. 😳
2-14 Reply  



















-  targetschwab
You can leave a Google review for Kline & Specter, PC
2-13 Reply  
-  richierichbaker
Cline and Spector are crooks
2-12 Reply  
-  eli_390
Boycott them.
2-11 Reply  
-  catscreationsnj
Kline and specters commercials are all over the place in the tri state. Glad to know how shady they are!
2-11 Reply  
-  bri_donkulous
Get 'em
2-10 Reply  
-  official_killa_jay0
Expose them
2-10 Reply  
-  hotwingbae
Won't be long until they close the firm...
TikTok don't play about stuff like this..
2-10 Reply  
-  rekteffekt
Never work with Klein and specter of you are in Philly.
2-9 Reply  

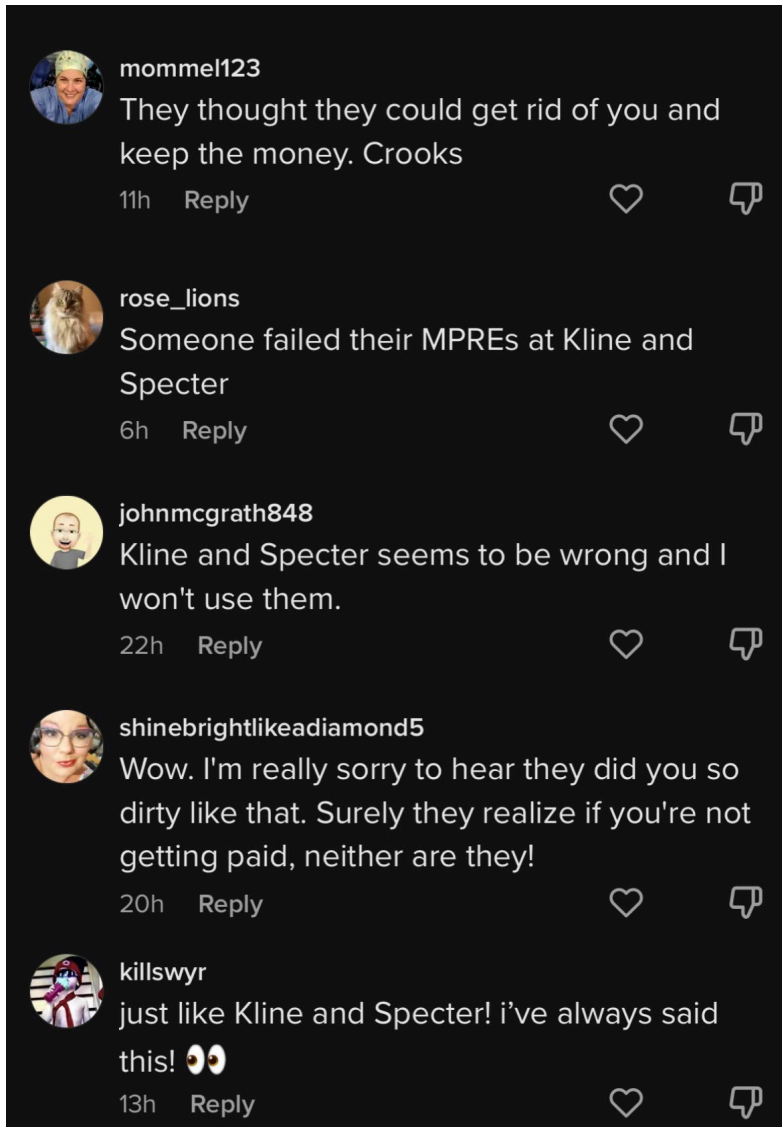
-  **steviebellwood**
Kline and spectre should be avoided. Noted.
2-9 Reply  
-  **march0312768**
Let's leave them some reviews 😅
2-9 Reply  
-  **even_steven790**
Boycott Kline and Specter
2-9 Reply  
-  **kcavin**
I hope someone files a grievance! Scumbags!
I'm so glad I work for decent firm that cares
about hiring ethical lawyers!
2-9 Reply  
-  **alwaysmep**
👉 never hire klien and spector. 🙄
2-9 Reply  
-  **theprofessor320**
Kline and Spector should be disbarred
2-9 Reply  
-  **profinsc**
I hope this goes viral so we all know about
this firm
2-8 Reply  

-  hotshotdan
Motion for Sanctions their asses 😁 that's what I'd do 😎👍
2-8 Reply  
-  figstter
Kline and Specter PC lets give them some reviews people
2-8 Reply  
-  lee02lee02
Just left my YELP review. 😊
2-8 Reply  
-  user9136660370093
Wow how nasty they are! Kline Specter has no right!!!
2-8 Reply  
-  madrad318
Sounds like Kline and Spectre is losing some business. Rightfully so.
2-8 Reply  
-  may_be_jay_be
Thank you for naming the firm. Unethical behavior needs to be exposed
2-8 Reply  
-  jboy9jn
How do you just smeared their name?
Thanks. Won't be using them.
2-8 Reply  

-  mounjarho
PA Here: Never use Kline & Specter 
2-7 Reply  
-  isinthegrid
Never  hire  Kline & Specter . Got it!
2-7 Reply  
-  johnsturman8
Won't be using that firm!
2-7 Reply  
-  user7312985127031
I'm glad you named this scumbag practice
they don't deserve another client ...ever!!
2-7 Reply  
-  thenajahall
Kline and Specter is trash...got it!
2-7 Reply  
-  kyleeichin
Sounds like you should name drop your
former firm so other people can boycott them
2-7 Reply  
-  survivingthriving517
the former firm definitely uses unethical
practices to squeeze out as much money as
they can get away with.
2-7 Reply  

-  **johnthomas6935**
Thanks for name dropping. It's important to hold people/companies responsible for their actions.
2-7 Reply  
-  **rumplestiltskinjones**
Kline & Specter sounds like a shady place it's a name like that.....
2-7 Reply  
-  **williamkd007**
need the firms name so I never use them
2-7 Reply  
-  **ericismyname33**
I'll never use that firm.
2-7 Reply  
-  **zach6288**
This should be something that gets the partners of that firm disbarred.
2-7 Reply  
-  **danjazz1985**
The company he used to work for is called Kline & Specter PC
2-7 Reply  
-  **danjazz1985**
They are based in Philadelphia
2-7 Reply  










-  pennwhy
Kline and Specter - got it! Never use them!!!!
2-7 Reply  
-  mnbvcx2022
Thanks for sharing and also sharing the name of the unethical firm so we all know who not to use or trust.
2-7 Reply  
-  codiboadi
yeah I'd make sure everyone knew who your old company was so no one ever goes to them. greeeeeeed
1d Reply  
-  conchanchar_gerry
another judge would have been on kline & specters 'payroll'. ure lucky to have gotten an honest judge, or he was just too expensive for kline & specte
2d Reply  
-  nicoplated
Well I see them on TV all the time they are greedy 😬😬😬
2d Reply  
-  jesscmore
And now it'll keep costing them. Bad call, Kline & Specter.
1d Reply  






54. Negative Instagram comments have also been made, including by “therealbren”:
“Shameful behavior on your former firm...ugly.”

55. And beyond inciting these blanket, widespread attacks on the Firm’s business, Mr. Bosworth’s statements also discouraged specific individuals from following through on plans to contact the Firm, as one follower who “was just about to recommend my brother call [the Firm] tomorrow” stated, “Hell no won’t be calling them,” while another wrote, “Thanks for the info, I was just about to Call them to Represent me in a Case, But not [now],” and yet another

responded, “Wow I was just thinking about going with them have a malpractice lawsuit was offered 2 million but thought they could get me more.”

-  **user3084049282762**
Damn I'm glad I saw this. I was just about to recommend my brother call them tomorrow. Hell no won't be calling them.
11h Reply  
-  **mfm.74**
Thanks for the info, I was just about to Call them to Represent me in a Case, But not Know
22h Reply  1 
-  **mfm.74**
Not Now Sounds Better
12h Reply  

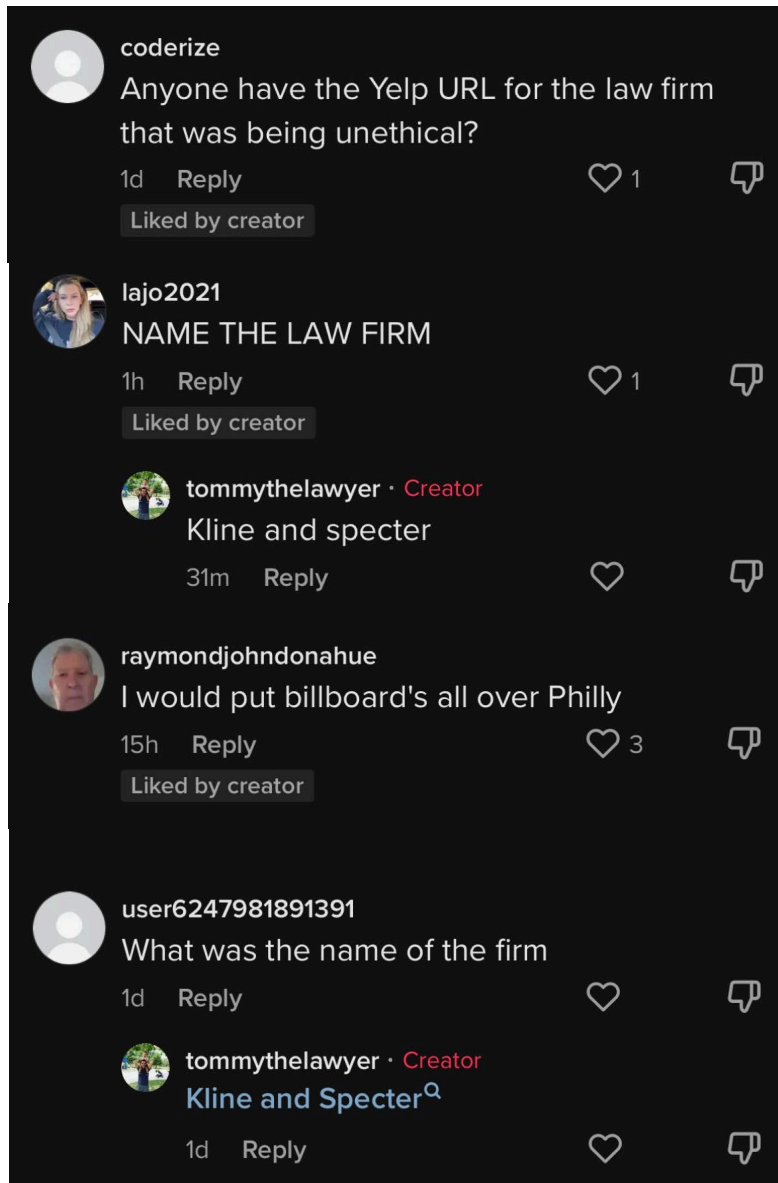
 **gemini_status**
Wow I was just thinking about going with them have a malpractice lawsuit was offered 2 million but thought they could get me more
2h Reply  

56. Kline & Specter has also lost potential staff due to this conduct. A person with the handle “phillyparalegalhere” wrote, “Don’t work for Kline & Specter.”

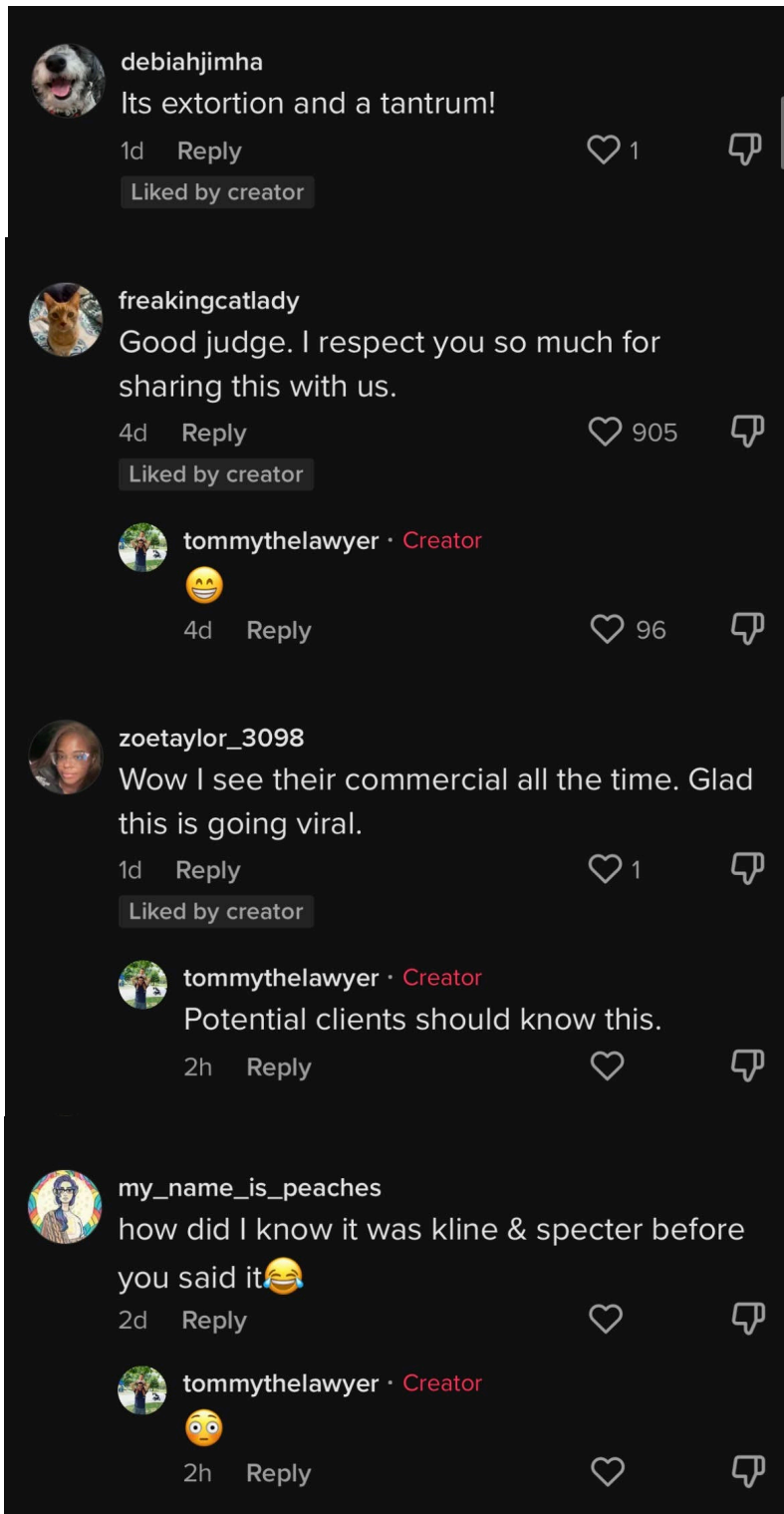
C. *Mr. Bosworth Fans the Flames of Hatred Against The Firm*




57. And rather than condemn the attacks on the Firm elicited by his videos, Bosworth specifically “liked” various of his followers’ screeds against the Firm, even to the point of specifically adopting, promoting and endorsing, the statements that the firm’s lawyers were evil, terrible, awful, shady, dirty, despicable, horrible, unprofessional, unethical, frauds, scammers, goofballs, disgusting, shitty human beings and, on at least six occasions, endorsed, adopted and promoted the statement that the Firm’s lawyers were extortionists. The scope and breadth of the





disparagement by his followers that were adopted, endorsed and promoted by Bosworth is shocking to the conscience.









ella_p51
Hold on while I go to their Google. Bunch of greedy liars. I loathe unethical people
1d Reply 2
Liked by creator









 robinbrown275
what an awful law firm ! They don't deserve you and they don't deserve that money.
4d Reply  23 
Liked by creator




 tommythelawyer · Creator

4d Reply  3 


 naritatravel
What was that firm name ... to never go to them !! 🤪🤪 Waoos disgusting firm
20h Reply  




 tommythelawyer · Creator
Kline and Specter
2h Reply  
Hide ^




 deborahc127
I think we need story time.
3d Reply  1 
Liked by creator




 bemysugarpie
I do hope the clients that are using them now. Leave them hit them in the pocket book.
4d Reply  1 
Liked by creator




 mickeybeep
How shady!! Good ethics out the window
4d Reply  1 
Liked by creator




- 




leeh3283
So dirty.
10h Reply  1 
Liked by creator
- 



kh9syjx3kr
sickening! keep doing the good work that you are doing.
20h Reply  1 
Liked by creator
- 






















enzo_789_
Wow how utterly despicable
1d Reply  1 
Liked by creator
- 



















adriancollins22
You have been released from the talons of greed.
1d Reply  1 
Liked by creator
- 



















sweettah
They ought to be ashamed!
1d Reply  1 
Liked by creator
- 






















tommythelawyer · Creator
They're not.
2h Reply  
- 



















ketolin1
Disgusting!
2d Reply  1 
Liked by creator



















-  **kellyjconley**
Glad you're no longer there- life is to short to work with an unethical firm
2d Reply  1 
Liked by creator
-  **thesuprarox**
So disheartening
3d Reply  1 
Liked by creator
-  **jckurowski**
Horrible law group
4d Reply  1 
Liked by creator
-  **therealtenbearz**
I'm glad you got it and not those dirtbags
4d Reply  1 
Liked by creator
-  **333ssmith**
Kline and Specter need to act with integrity they have a fiduciary duty to do no harm to client!
2d Reply  1 
Liked by creator
-  **tommythelawyer** · Creator
You are correct.
2h Reply  
-  **kelly_olson**
Unbelievable behavior.
3d Reply  1 
Liked by creator

-  **bickidan**
GREEEEEEEDDDDDDY
4d Reply  1 
Liked by creator
-  **travelingpoetically**
Isn't that extortion?
3h Reply  1 
Liked by creator
-  **zackary459**
I will NOT ever be using them
4d Reply  1 
Liked by creator
-  **y_t_too.exe**
very petty n unethical for sure
4d Reply  1 
Liked by creator
-  **clumsycolin**
That is absolutely disgusting. Thank you for
outing them. I wouldn't want to deal with
people like them. Thank god for the judge.
4d Reply  1 
Liked by creator
-  **efrainvazquez714**
So they tried to extort you and the client 🤔
4d Reply  1 
Liked by creator

-  **addylinthedoll**
Wow! That's crazy I'm glad the judge was level headed and knew about the pettiness going on his courtroom by greedy lawyer
4d Reply  1 
Liked by creator
-  **hillbrookville**
tell me why the client, who's file was withheld wouldn't sue Klein spector for damages and suffering?
4d Reply  1 
Liked by creator
-  **lizael2004**
Kline & Spector you say? 😊
4d Reply  1 
Liked by creator
-  **nicolajsvoboda**
Effing POS's!!
4d Reply  1 
Liked by creator
-  **joedongabes**
Sanctions
4d Reply  1 
Liked by creator
-  **..hillaryrose**
Evil firm. Wild. Thank goodness the judge was there. Kline wasted everyone's time.
4d Reply  1 
Liked by creator

-  **rgj1954**
Terrible firm
4d Reply  1 
Liked by creator
-  **j4m3xx**
what firm was that ?
4d Reply  1 
Liked by creator
-  **tommythelawyer** · Creator
Kline and Specter
4d Reply  
-  **kubsfairy**
Love that you named and shamed them
4d Reply  1 
Liked by creator
-  **ed123456788888**
ty, hopefully they will get a bad review and they will continue to lose customers
4d Reply  1 
Liked by creator
-  **toospicy_4_thepepper**
Law firms like these should be blacklisted.
4d Reply  1 
Liked by creator
-  **freespkr**
Sanctions? Bar reporting?
4d Reply  1 
Liked by creator

-  spinningcatastrophe
I hope someone reported it to the state bar
4d Reply  1 
Liked by creator
-  slkr73
Why are they able to still practice? They need to be disbarred!
4d Reply  1 
Liked by creator
-  naumectica
So basically your former law firm ruined their entire reputation over \$250,000 and being petty. Wow!
4d Reply  1 
Liked by creator
-  erdoganbing
Just keep getting the word out so we can avoid these lawyers and law firms.
4d Reply  1 
Liked by creator
-  dondada247365
Ooooh that's malpractice on their part
4d Reply  1 
Liked by creator
-  bamabrowser
Well done! Watch your back. That firm sounds vengeful.
4d Reply  1 
Liked by creator

-  danieh1972
Oh shit! I knew who you were talking about as soon as i heard the amount of the verdict!
4d Reply  1 
Liked by creator
-  danieh1972
I worked on Blum v Merrill Dow I think '94
4d Reply  1 
Liked by creator
- Hide ^
-  dr._mantis._toboggan
Kline and Specter is one of the largest personal injury firms in the Philly area for people not local. Disgusting.
4d Reply  1 
Liked by creator
-  brianmcsr
wow fk Kline and Specter, that is good to know!
4d Reply  1 
Liked by creator
-  ckiriff
Hope you and/or the judge reported the conduct to the bar. This is abhorrent.
4d Reply  1 
Liked by creator
-  parallax yokai
S Might be a reason clients didn't want them 😏
4d Reply  1 
Liked by creator

 bobbyb513
So in other words. NEVER use Kline & Spector. 🤪🤪 The article about you is on Law.com good luck 👍💕💕💕

4d Reply  1 

Liked by creator

 jacquibernier
Kline and Spector sound like shitty human beings... out with the old and in with the new 🌸

4d Reply  1 

Liked by creator

 jacquibernier ▶ userpeacebewithyou
Is this Kline or Spector? I can't wait for this ☕🤪

4d Reply  2 

Liked by creator

 nichetokcore
My G Tommy gets hit with a defamation lawsuit from the firm buckle up bucko

3d Reply  




 tommythelawyer · Creator
It's not defamation if it's true




3h Reply  




 kelleymaurabestbiagioli
Totally unprofessional of them




2d Reply  10 




Liked by creator





 **welshwomansc**
they contacted me .. I was disappointed it wasn't you
2d Reply  




 **tommythelawyer** · Creator
Who did?
3h Reply  




 **welshwomansc** ▶ **tommythelawyer**
your ex company. in think the content here is self explanatory lol
3h Reply  




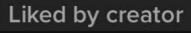
 **tommythelawyer** ▶ **welshwomansc**
In response to what?
3h Reply  




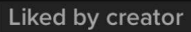
 **kimcablebrafford**
Yikes. That sounds very unethical.
4d Reply  26 
Liked by creator




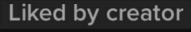
 **tommythelawyer** · Creator

4d Reply  6 




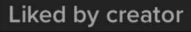
 **wchhb**
More interesting question is why the law firm fired you after a huge win.
4d Reply  37 




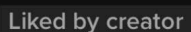
 **frankycom**
Prob to take the client (\$\$) & keep them after Tom did all the legwork.
3d Reply  27 
Liked by creator






















 **snobdcrash1**
Don't feel the need to respond to your previous employer's pettiness, they are embarrassing themselves!
4d Reply  15 
 Liked by creator





 **srmihx**
They're gonna need to hire a PR Firm now which means more lost \$\$\$ 😂
4d Reply  11 
 Liked by creator





 **samwortham1**
Those goofballs
4d Reply  4 
 Liked by creator




 **snobdcrash1**
It's funny how they were quick to respond to online negative reviews:)))))) sometimes, changing the wording only makes them look desperate:)
4d Reply  4 
 Liked by creator




 **n.e.ohio55**
Won't ever use that firm except for toilet paper. How disgusting and petty
4d Reply  1 
 Liked by creator




-  **appleuser72762549**
Sounds like they're just bitter & extorting money out of you because their only recourse is to hit 'em where it hurts, their pockets.
1d Reply  1 
Liked by creator
-  **appleuser72762549**
They don't actually care about their clients... they only care about the money
1d Reply  1 
Liked by creator
-  **texasrootsranch1**
Wow, no morals, potential clients may want to go somewhere else.
2-8 Reply  1 
Liked by creator
-  **marcussaison8**
Kline & Specter PC are a bunch of frauds.
2-7 Reply  1 
Liked by creator
-  **marcussaison8**
Kline & Specter PC are a bunch of frauds.
2-7 Reply  1 
Liked by creator
-  **spindriftz**
Wouldn't that be extortion?
2-7 Reply  1 
Liked by creator
-  **user31212530**
well that firm is done 😁👍
2-7 Reply  1 
Liked by creator




 **angelajackson728**
oh Tommy we should talk know this firm well

2-7 Reply  1 
Liked by creator




 **tommythelawyer** · Creator
So do I. Worked there for 5 years 
2-7 Reply  

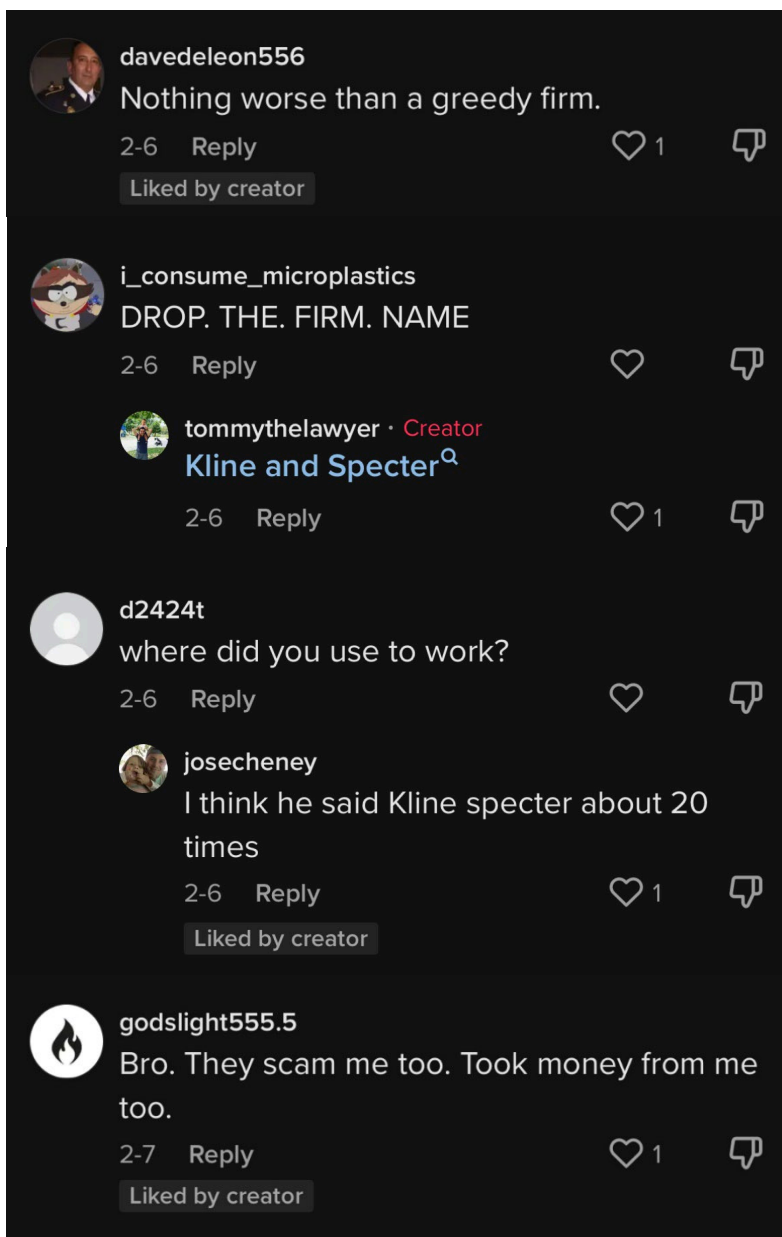
 **dr._mantis._toboggan**
Kline and Specter is one of the largest
personal injury firms in the Philly area for
people not local. Disgusting.
2-6 Reply  1 
Liked by creator

 **colesonmusic**
yes theyre despickable. every criminal will
pay when its time. the Light Knows All Truth.
2-6 Reply  1 
Liked by creator

 **ckiroff**
Hope you and/or the judge reported the
conduct to the bar. This is abhorrent.
2-6 Reply  1 
Liked by creator

 **attitudeofgratitude8**
Hello, Extortion ?
2-6 Reply  1 
Liked by creator

 **myb_004**
It sounds like extortion.
2-6 Reply  1 
Liked by creator



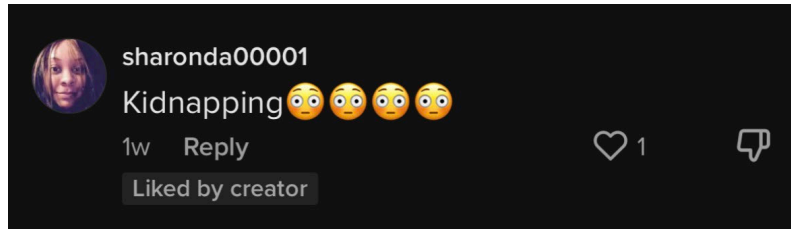
58. A “like” on social media is an “expression of agreement, approval, or enjoyment of the post.”

59. Where such an “expression of agreement, approval or enjoyment” can be seen by such a large number of viewers, that expression is magnified and increases the impact of the original videos and the comments on them.

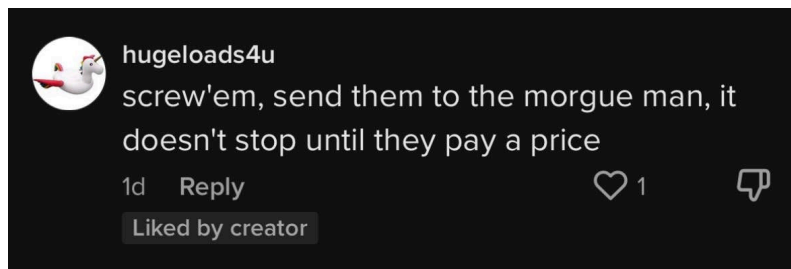
60. Where those comments are threatening, “likes” are deliberate endorsements that encourage more posts and multiply the threat.

61. And many of the worst anti-Firm comments posted on TikTok were "liked by the creator"- the creator being Mr. Bosworth.

62. Mr. Bosworth endorsed a post that reads “Kidnapping [four worried emojis].”

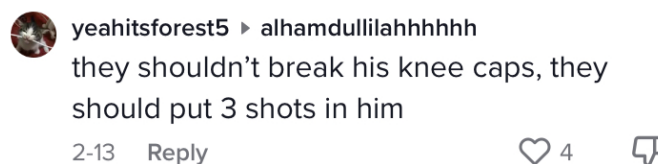


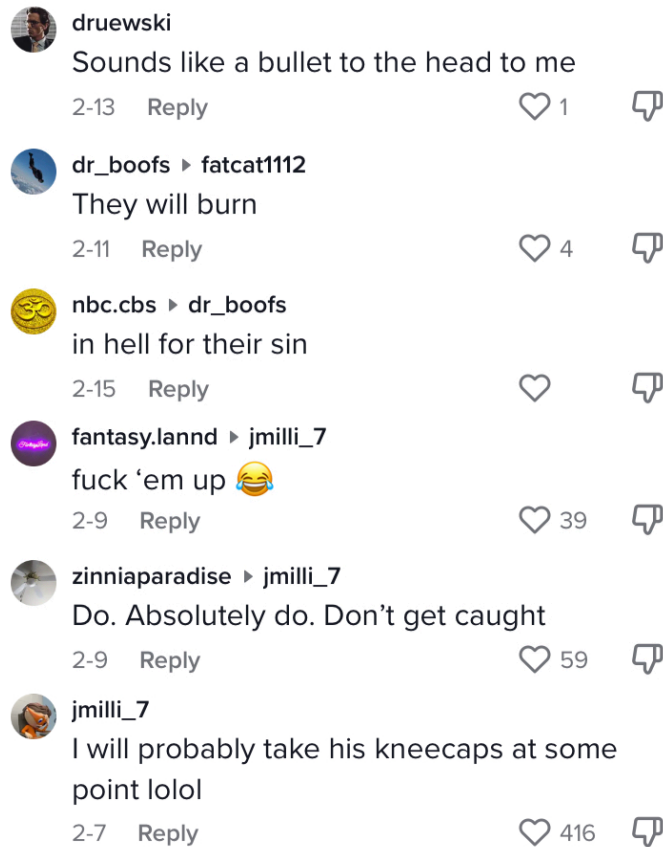
63. Sickeningly, Mr. Bosworth “liked”—endorsed—the call by his follower to “screw ‘em, send them to the morgue man, it doesn’t stop until they pay a price.”



64. Mr. Bosworth’s online endorsement of violence constitutes a clear and present danger to the more than 170 people at his former Firm.

65. One conversation not involving Kline & Specter generated a top comment and subsequent responses hosted and, this, substantially assisted by Mr. Bosworth under Mr. Bosworth’s “Greed” video that devolved into multiple other shocking threats of violence.





66. Mr. Bosworth, as the creator, hosted and allowed these other violent and incendiary comments to develop over many days and to remain, and took no action to remove them or repudiate them, either of which he could have easily done and should have done, until February 28 when he took down the videos.

67. Using the imprimatur of his status as a lawyer, Mr. Bosworth allowed, promoted, sanctioned and amplified the approval of violence as a remedy to his followers, consistent with his previous “like” approving of “tak[ing Kline and Specter] to the morgue.”

68. Although Mr. Bosworth later removed his “like” from the comment calling for his former employers to be killed, his followers had already heeded the call of Mr. Bosworth’s dog whistle.

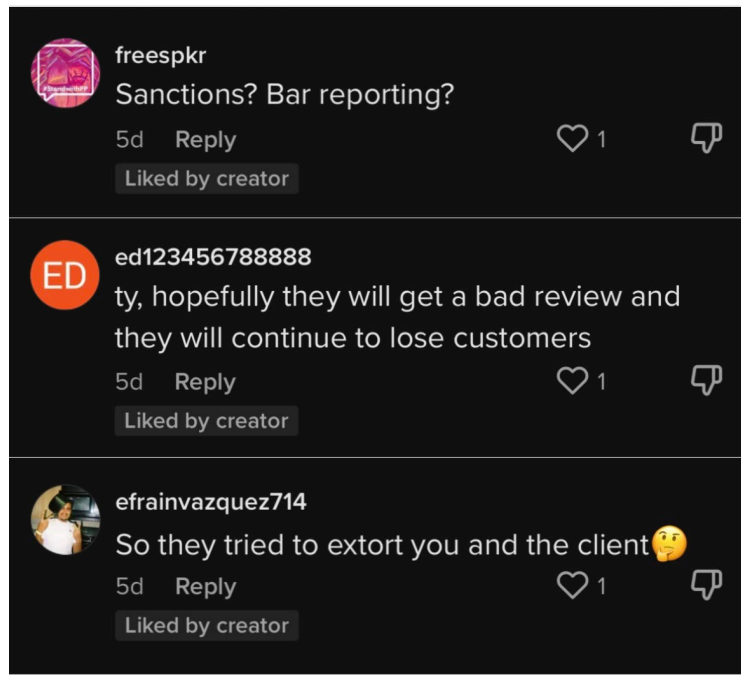
69. And the bell Mr. Bosworth rang that eroded a good reputation built up over decades and put so many of his former colleagues in fear for their safety cannot be unring.

70. Likewise, Mr. Bosworth failed to condemn the post or remove it — which would have been easy to do.

71. In fact, Mr. Bosworth declined to remove or condemn any of the many violent, hateful and vicious comments he generated.

72. That stereotypical tropes and hate speech trigger violence is well known. *See, e.g., Counterhate.com (section on antisemitism); Stereotypes of Jews, Wikipedia.*

73. Mr. Bosworth also “liked” many of the comments calling for others to harm the Firm financially, most of them advocating for the mass posting of negative reviews against the Firm.





ella_p51

Hold on while I go to their Google. Bunch of greedy liars. I loathe unethical people

1d Reply

♡ 2



Liked by creator



sharonda00001

Kidnapping 🤪🤪🤪🤪

1w Reply

♡ 1



Liked by creator



coderize

Anyone have the Yelp URL for the law firm that was being unethical?

2d Reply

♡ 1



Liked by creator



bemysugarpie

I do hope the clients that are using them now. Leave them hit them in the pocket book.

4d Reply

♡ 1



Liked by creator



toospicy_4_thepepper

Law firms like these should be blacklisted.

4d Reply

♡ 1



Liked by creator



jacquibernier

Kline and Spector sound like shitty human beings... out with the old and in with the new

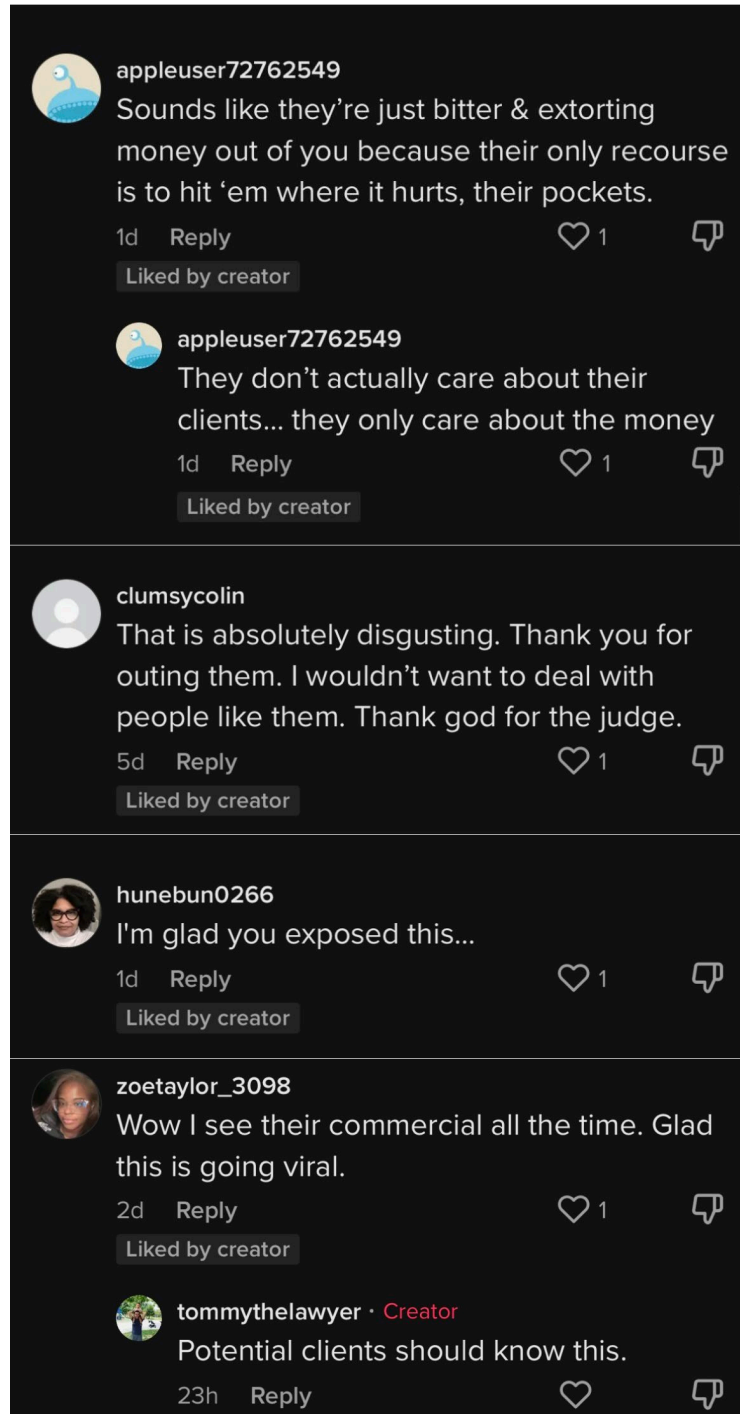


4d Reply

♡ 1

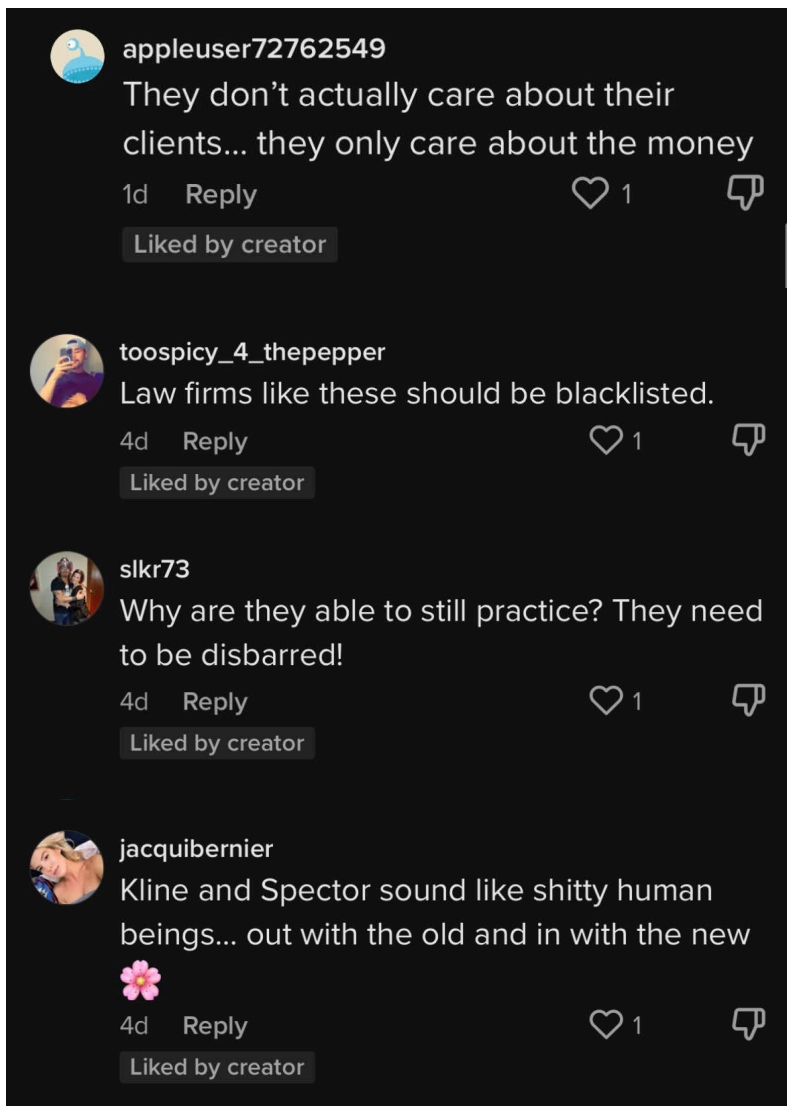


Liked by creator



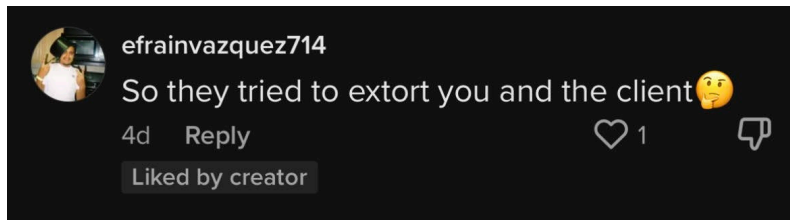
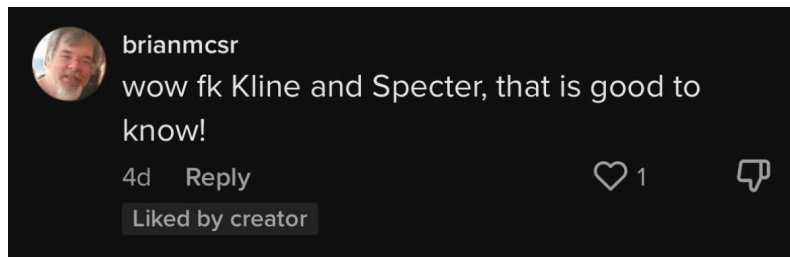
74. Predictably, what followed from Mr. Bosworth's "likes" was a slew of negative ratings against the Firm.

75. Some of the comments Mr. Bosworth “liked” include “they don’t actually care about their clients ... they only care about the money;” “Law firms like these should be blacklisted;” “Why are they able to still practice? They need to be disbarred;” and “Kline and Spector sound like shitty human beings ... out with the old and in with the new.”



76. Other comments Mr. Bosworth “liked” state “wow fk Kline and Spector, that is good to know!;” “So they tried to extort you and the client;” “That is absolutely disgusting. Thank you for outing them. I wouldn’t want to deal with people like them. Thank god for the

judge;” and “I do hope the clients that are using them now. Leave them hit them in the pocket book [sic].”



77. As to the comment “Wow I see their commercial all the time. Glad this is going viral,” Mr. Bosworth not only “liked” it but also left a reply comment that “[p]otential clients should know this.”



78. And the attacks Mr. Bosworth instigated have not been limited to the Internet.

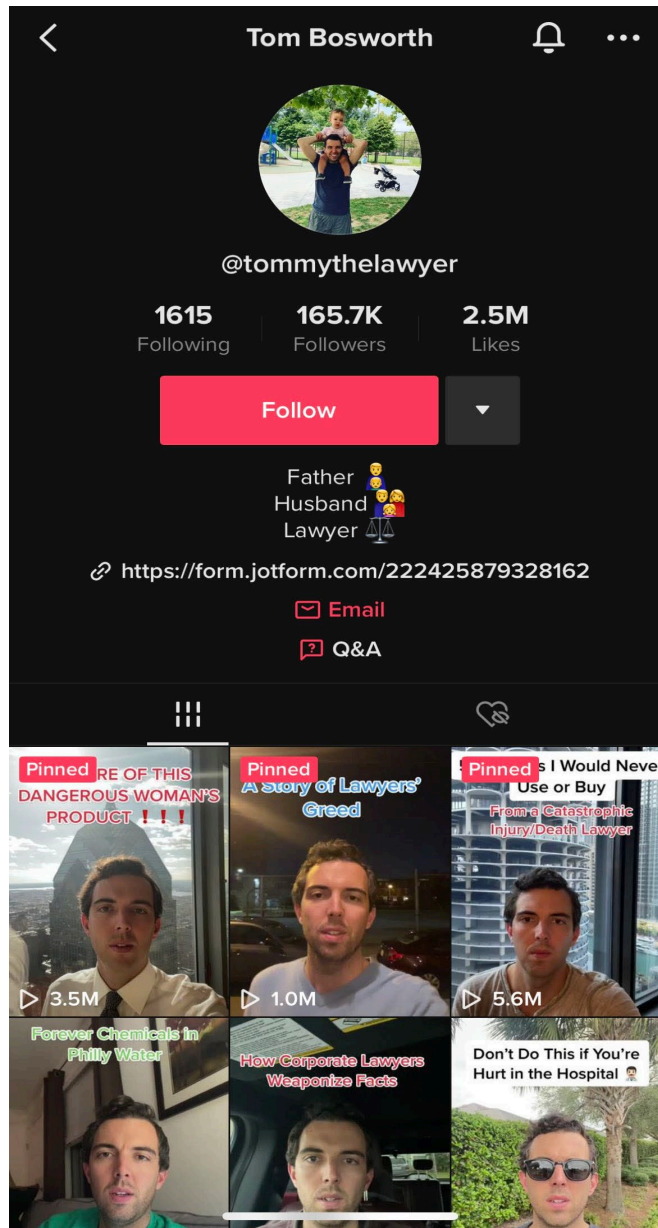
79. In a voicemail parroting Mr. Bosworth’s false statements, a caller accused the Firm and its partners of “thuggery,” thievery,” underhandedness” and “evilness,” specifically citing Mr. Bosworth as both the caller’s source and his motivation:

I am calling in regards to the story that has gone viral on social media all over TikTok and all over Facebook from Mr. Tom Bosworth, calling out your firm specifically for the firing and for you withholding a file and holding it ransom and essentially for \$250,000. That was absolutely vulgar and disgusting to know that your firm participated in such thuggery and thievery. This is absolutely vulgar and absolutely disgusting to know that your partner there at that firm is participating in such underhandedness and such evilness. And there has to be accountability. This can’t stand.

80. As the creator of these false and inflammatory videos, Mr. Bosworth could have taken them down at any time. He did not prior to February 28.

81. Instead, Mr. Bosworth followed his first defamatory video with a second and a third.

82. In fact, Mr. Bosworth “pinned” the first “Greed” video to the top row of videos on his TikTok profile page. *See below screenshot.*



83. TikTok allows creators to pin up to three featured videos to the top of their video feed on their profile page, which deviates from the standard chronological order.

84. Creators like Mr. Bosworth use pinned videos to draw attention to videos they want people to see. That's exactly what Mr. Bosworth did here, drawing more and continuing views and more and continuing violent, antisemitic and destructive comments.

85. Mr. Bosworth could have at any time taken down or deleted any and all of the violent or bigoted comments incited by his postings. He did not.

86. Instead, Mr. Bosworth effectively validated some of the most troubling of these comments.

87. Mr. Bosworth could have expressed disapproval of the violent, racist, and other disgraceful and disruptive comments by posting replies of his own. He did not.

88. Instead, Mr. Bosworth has left it to the Firm to undertake the very difficult task of convincing TikTok, Meta and Google to remove the posts and comments, which has only been partially successful.

89. In his monologue, "Greed (Episode 2)," Mr. Bosworth recognizes that his social media campaign against the Firm had succeeded and is continuing to rile his numerous followers against the Firm.

90. Mr. Bosworth explains, "[t]he video [Greed] received a lot of attention, people were obviously upset to hear that and not happy about that. And after I posted that video, a number of people left Google reviews on Kline and Specter's page, expressing, expressing their thoughts and feelings about hearing this news that this law firm had withheld the file until the court ordered them to turn it over." Bosworth TicTok Video, "Greed (Episode 2)."

91. Thereafter, Mr. Bosworth posted yet another monologue, further fanning the sickening prejudices of many of his followers.

92. The Firm and its staff have endured the full brunt of Mr. Bosworth's social media campaign of harassment.

93. The Firm was advised to alert the FBI, DHS, and others of the multiple threats received since Bosworth's videos were published.

94. As a result of these threats and this harassment, the Firm told its more than 170 attorneys and staff members by email late in the evening of February 8:

Following Legal Intelligencer reporting last Friday on a motion filed in federal court by a defendant seeking sanctions against Tom Bosworth for deposition misconduct, Tom weaponized his social media presence to wreak havoc upon Kline & Specter and us [the founding partners] personally.

Tom posted a lyric from virulent anti-semitic Kanye West to accuse us of controlling the media. Over the past few days, he has posted harshly critical serial video monologues on TikTok and Instagram titled ‘Greed’ – another familiar anti-Semitic trope. The initial TikTok video had over 600,000 views.

This has caused threats of violence and death against us, as well as many anti-Semitic and other despicable postings. One comment on Tom Bosworth’s TikTok says ‘send them to the morgue man.’ Another says: ‘Surprised more mass shootings don’t occur in law offices.’

The FBI, DHS and others have been informed of all this and have the relevant social media posts. Follow up is occurring. [Partner] is informing the building management and asking that they take appropriate steps. [Partner] is assessing whether enhanced security is appropriate.

We believe you should be aware of all of this. If you need accommodation in some way, please let [Partner] know and we will be sensitive to such concerns and requests.

95. Through counsel, Kline & Specter repeatedly demanded that Mr. Bosworth take down the Ye postings and the three “Greed” videos along with the incendiary comments from followers whether he had “liked” them or not.

96. Despite the violent threats and other ongoing damage, this demand was repeatedly rejected by Mr. Bosworth through his counsel Geoffrey R. Johnson of the Law Office of Geoffrey R. Johnson and James C. Schwartzman of Stevens & Lee.

97. Mr. Bosworth was unrepentant and determined to let the campaign of harassment he instigated continue regardless of the consequences.

98. On February 28 at 11:09 AM, Kline & Specter’s attorney, Joseph R. Podraza, Jr., told Mr. Bosworth’s counsel, Geoffrey Johnson by email, “[t]he nonnegotiable and final deadline for the permanent removal of the three “Greed” TikTok and Instagram posts and all related comments is 3pm today, February 28, 2023. If they aren’t taken down, we will go forward and file Bosworth II.”

99. Mr. Johnson replied at 11:29 AM: “I have advised Tom [Bosworth] to take the videos down and his is going to do so.”

100. Mr. Bosworth then took down the TicTok videos but left up the Instagram videos, thereby breaking his word to his lawyer and to Kline & Specter. Later that night, he removed the Instagram videos.

101. The Firm justifiably fears that violence will result from the videos, postings and comments to date and any videos, postings and comments still to come.

D. *Mr. Bosworth’s Social Postings Contain Actionable Statements Which Are Provably False*

1. First Video – “A Story of Lawyers’ Greed”

102. On February 7, 2023, Bosworth posted a video under his TikTok profile titled “A Story of Lawyers’ Greed,” setting the tone and framing the “backstory” for his defamatory attack orchestrated against the Firm through social media.

103. In “A Story of Lawyers’ Greed,” Bosworth makes false, defamatory and entirely out-of-context statements about the Firm, accusing the Firm of improperly and unethically withholding and/or retaining client documents with the intent of harming a client, all for purposes of making money.

104. Moreover, Mr. Bosworth concealed from his followers the reasons for his termination and existence of his Employment Agreement, the latter of which entitles the Firm to request that Mr. Bosworth pay the costs on any transferred files before surrendering possession.

105. Specifically, Bosworth's "A Story of Lawyers' Greed" video posting (as transcribed) reads:

A Story of Lawyers' Greed

Just to give you an idea how greedy and how low some lawyers can be and how consumed with money they can allow their lives to be – As some of you might know that in September I got the largest medical malpractice verdict in the State of Pennsylvania for that year it was \$19.6 million dollars. Um and so less than two months later my firm actually fired me which is a whole other story I'm not going to get into right now, but they fired me. After they fired me, the client who I got that record verdict for, she fired them, which is her right to do and decided to remain represented by me as did many many other clients but she fired them and went with me. After she did that, my former firm, Kline and Specter, they actually, they withheld the file from me during a time when she had a court deadline due in the near future, they wouldn't turn the file over to me unless I paid them the cost on the file which was like a quarter million dollars. Now you might not know this but in personal injury cases, um the lawyer, the lawyer gets paid back all the costs when the case settles, if the case settles. Um so, yeah. But Kline and Specter is demanding that for me to even get the clients file, I have to pay them all those costs so we end up before the judge and to put it lightly the judge was not happy about that unethical conduct and the judge among other things told Kline and Specter's lawyer they were quote obligated to turn the file over um he said to the lawyer so you're saying you could withhold that file which is to the detriment of your previous client because Mr. Bosworth isn't going to pay you a quarter million dollars today? Um, it got worse, the lawyer tried to double down for Kline and Specter, the judge said I understand what your ethical duty to your client is and its not for Mr. Bosworth to pay you a quarter of a million dollars before you give that file. You don't have a right to withhold that file. So I thought the Kline and Specter lawyer was getting the hint but he kept on going, kept on going and kept on going. And the judge said quote then tell me where you're justified to hold that file hostage, she actually used the word hostage. And it took the judge threatening Kline and Specter to hold them in contempt of court if they didn't turn the file over. This is a lady whose paralyzed and had an upcoming deadline, like I get it, you guys are upset that you didn't get the case but um, they were actually willing to withhold the file and potentially harm her filing deadline for money.

See <https://www.instagram.com/reel/CoWJB3LDBI-/?igshid=MDJmNzVkMjY>

106. Although claiming the Firm “withheld,” and was “actually willing to withhold the file and potentially harm [the client’s] filing deadline for money,” even suggesting he had to seek court intervention to compel the Firm to turn over the file, Mr. Bosworth omits that he had a legal obligation per the express terms of his Employment Agreement to pay the costs on the file before it could be transferred, that Mr. Bosworth flatly refused to pay these costs or even acknowledge his contractual responsibility, and that it was Mr. Bosworth’s own delay that jeopardized the client’s interests when Mr. Bosworth failed to complete timely posttrial motions.

107. The video posting makes no mention of or to Mr. Bosworth’s Agreement dated April 12, 2017.

108. The Agreement provides that:

If, in the event of my departure, a client chooses me as his/her/counsel, I will, prior to the file leaving this office, cause to be repaid to [the Firm] all of the file costs on the file and will assume full responsibility as guarantor in the place of [the Firm] for any obligation (such as letters of protection, etc.)

Clause (8) of Exhibit “A.”

109. Clause (8) of the Agreement protects the substantial investment by the Firm in any case which leaves with a departing Firm lawyer.

110. Clause (8) is included in the Agreement so the Firm’s substantial investment in the departing case is not lost due to the absence of the Firm’s substantial resources in the continuing prosecution of the case.

111. Said differently, Mr. Bosworth and the Firm both agreed when the Agreement was signed in April 2017 that the Firm’s investment in the prosecution of any case which may later depart with Mr. Bosworth would not be placed at risk due to the departure because these costs would be paid in full to the Firm upon the departure of the case.

112. The Firm costs on the file referenced in Mr. Bosworth's social media posting exceeded \$250,000.

113. On information and belief, when he solicited the client for representation following his discharge from the Firm, Mr. Bosworth did not inform the client of his obligation to reimburse the costs and expenses on her case if she were to elect Mr. Bosworth to continue representing her after his discharge by the Firm.

114. On information and belief, when he solicited the client for representation following his discharge from the Firm, Mr. Bosworth did not tell the client about the Firm's right to retain her file unless and until Mr. Bosworth paid the Firm the total amount of costs the Firm paid on her case as required under Clause (8) of his Agreement with the Firm.

115. On information and belief, when he solicited the client for representation following his discharge from the Firm, Mr. Bosworth did not inform the client about the existence of the Agreement between him and the Firm.

116. Upon information and belief, Mr. Bosworth also did not tell the client he intended not to comply with Clause (8) of his Agreement should the client elect Bosworth to represent her following his discharge by the Firm

117. Upon information and belief, when the client elected Mr. Bosworth as her counsel following his discharge from the Firm, the election was made without knowledge of these (as well as other) material disclosures or information Mr. Bosworth was required to, but deliberately did not, make to the client to enable her to make an informed election about representation.

118. On November 22, 2022 Mr. Bosworth obtained his client's signed election and provided the Firm with a copy.

119. Also on November 22, 2022, Mr. Bosworth requested by letter to the court additional time to complete posttrial motions, which were then due the following day, November 23, 2022.

120. The Firm honored the client's election of Mr. Bosworth as her counsel after Mr. Bosworth presented the Firm with her signed election indicating her choice of Mr. Bosworth as her counsel, and thereafter withdrew as counsel in the action.

121. When Mr. Bosworth was reminded of his obligation under Clause (8) of the Agreement to reimburse the Firm's substantial costs in the departing client's file, he reneged. By failing to honor his contractual agreement, Mr. Bosworth caused an unnecessary dispute to occur causing damages to the Firm.

122. Per Mr. Bosworth's November 22, 2022 letter to the court, he had been aware of the November 23, 2022 filing deadline since November 7, 2022—nearly two weeks before he was fired from the Firm for, among other things, failing to manage his caseload in a timely manner—and only contacted the court to request more time to complete posttrial motions on November 22, 2022, the day before they were due.

123. Nowhere in his letter requesting a filing extension did Mr. Bosworth suggest the reason he needed additional time to complete posttrial motions was due to the Firm “withholding” the client's file.

124. It was Mr. Bosworth's conduct immediately in advance of a filing deadline—at the time more interested in signing up Firm clients than working their cases, and in failing to pay the costs—that created the possibility of prejudice to the client.

125. It was in response to Mr. Bosworth's request for more time—despite having ample time to have completed or substantially completed the posttrial motions before his

termination—that the parties were ordered into court to meet with the judge, where for the first time Mr. Bosworth claimed his inability to complete posttrial motions by the deadline was due to the Firm’s alleged withholding the client’s file.

126. Counsel to the Firm explained that Mr. Bosworth was contractually obligated to reimburse the Firm for its substantial file costs and, in order to protect its lien interest, the Firm would turn over the file under order of the court.

127. At a proceeding on November 23, 2022, the Court acknowledged that the Firm had “a lien on that file [the departing file]. There is a lien on that case [the departing client’s case]” for the more than \$250,000 the Firm had paid to date to successfully prosecute the case now departing with Mr. Bosworth after his discharge by the Firm.

128. The Court also found that the former Firm client had a substantial need for her case file and ordered the Firm to produce the file without waiving its lien interests in the file or the case.

129. To ensure no prejudice to the former client, the Court also extended by an additional thirty days the period to file a brief on the former Firm client’s behalf.

130. Near the conclusion of the proceeding, the Court stated “I just don’t want to get all in the squabbling. Whatever squabble is going on there, I don’t want to get involved in that. I just want to make sure [the client] and this case moves forward” and wished the attending counsel “Happy Thanksgiving.”

131. The Firm was neither “greedy” nor “low” in retaining the former client’s file while court intervention was pursued, as falsely claimed in Mr. Bosworth’s video posting.

132. The Firm did not retain the file of the former client without a legal basis or right, as falsely alleged in Mr. Bosworth’s video posting.

133. It is not true that the threat of contempt caused the Firm to produce the former Firm's client's file to Mr. Bosworth, as he falsely states in his video posting.

134. To the contrary, having formally preserved its retaining lien interest in the file on the record before the Court, the Firm immediately produced the former client's file.

135. Bosworth's "A Story of Lawyers' Greed," having misrepresented that the Firm's efforts to preserve its lien interest and enforce the terms of Bosworth's Employment Agreement were motivated solely by greed, received over 1 million views on TikTok, countless likes on Instagram, and incited a litany of negative, derogatory and sadistic comments from viewers on both social media platforms, as discussed above.

2. Second TikTok Video – "A Story of Lawyers' Greed (Pt. 2)"

136. On February 8, 2023, the day after his first defamatory attack on the Firm, Bosworth took to social media for a second time setting forth additional defamatory statements about the Firm and falsely claiming that the Firm improperly, unlawfully and unethically contacted former clients directly for the purpose of interfering with their elections of Bosworth as their counsel and redirecting those clients back to the Firm.

137. Bosworth's "A Story of Lawyers' Greed (Part 2)" video posting (as transcribed) reads:

A Story of Lawyers' Greed (Part 2)

So some of you might know that less than 2 months after I got the largest medical malpractice verdict in the state of Pennsylvania in September that my old firm fired me and there's a whole saga and story about that that I'm not going to get into now. But, this is part 2 of an example of how that firm Kline and Specter acted wrongfully and greedily after firing me. Now one thing that you need to understand if you're not a lawyer is that when a person hires a lawyer or a person retains a lawyer and that lawyer represents the person, other lawyers are not allowed to communicate with that person directly. Other lawyers must communicate with the person's lawyer. That's the whole point of them having a lawyer is that the communication must go through the lawyer.

After Kline and Specter fired me, a slew of clients formally signed papers saying they understood that I was fired, they understood that they could stay with Kline and Specter and they didn't want to do that, they wanted to go with me, Tom Bosworth. Bunch of them. This made Kline and Specter very upset. But instead of playing by the rules and respecting the clients' decisions on multiple occasions, Kline and Specter lawyers, after receiving signed letters from the client saying we're terminating our relationship with you Kline and Specter and we're represented by Tom Bosworth. After Kline and Specter got these letters their lawyers would call, were still calling the clients, emailing the clients, contacting the clients. Directly. After they got these, these letters and after they knew that the clients had chosen another lawyer, me, to represent them. To add insult to injury, I guess the Kline and Specter lawyers didn't think that that things would get back to me but false statements were made about me to these people, disparaging remarks, the whole nine yards. And obviously, didn't work, cause these folks wanted me to remain their lawyer, but the point is that the ethical rules are clear as day that you can't do that and the only reason that they did that is because they wanted to get the client and retain whatever money interest they think they're owed in the case.

See <https://www.tiktok.com/@tommythelawyer/video/7197455680897453358?lang=en>

138. No representative of the Firm had any improper further contact with any Firm client after receiving their election of Mr. Bosworth to represent them following his discharge, and Mr. Bosworth's contention to the contrary in his video post is false.

139. Moreover, in communications with Firm clients that occurred prior to receiving an election, no Firm representative made any false representation about Mr. Bosworth, and Mr. Bosworth's contrary claim in his video post is false.

140. All representatives of the Firm complied with all ethical rules relating to communications with clients following Mr. Bosworth's discharge, and his claim to the contrary in his video post is false.

141. All representatives of the Firm acted properly and not "wrongfully and greedily."

142. Bosworth's "A Story of Lawyers' Greed (Part 2)" received at least 17,300 views on TikTok and a litany of comments from viewers on both social media platforms.

143. The above-quoted false and defamatory postings by Defendants have harmed the Firm's reputation and business standing in the legal community, as evidenced by the online attacks following Defendants' posts.

144. Defendants' social media statements and posts falsely stigmatize the Firm and are of a defamatory character.

145. Moreover, the substance of Defendants' social medial statements are provably and categorically false.

146. It is clear that Defendants' social media postings apply to the Firm, as the firm is explicitly named by Defendants.

147. Persons viewing these social media postings would understand the defamatory meaning of these posts and would know that the defamatory statements were intended to be applied to the Firm.

148. The publication of these loathsome statements, along with the use of stereotypical antisemitic verbiage, accusing the Firm of greed and wrongful and unethical misconduct, constitutes defamation *per se* for which harm is presumed.

149. There is no conditional privilege applicable behind which Defendants' might hide to avoid liability for these antisemitic, atrocious, false, defamatory and commercially disparaging statements.

COUNT I – DEFAMATION
(Plaintiff vs. Defendants)

150. Plaintiff incorporates by reference the averments contained in the foregoing paragraphs of Plaintiff's Complaint as though fully set forth herein at length.

151. Defendants published the above-mentioned statements, innuendos and implications concerning the Firm on various social media platforms.

152. The above-mentioned statements, innuendoes and implications concerning the Firm were entirely false and defamatory.

153. The above-mentioned false and defamatory statements, innuendoes and implications concerning the Firm were published to individuals, including individuals in Philadelphia County, who understood said statements, innuendoes and implications to refer to and defame the Firm.

154. Defendants knew that the vicious statements and innuendoes and implications concerning the Firm in the above quoted social media postings were entirely false or, if not, Defendants' avoidance of the truth was in reckless and/or negligent disregard for their truth or falsity.

155. Defendants' false and defamatory statements, innuendoes and implications have severely injured the Firm in that they have tended to: (a) blacken and besmirch the Firm's reputation; (b) expose the Firm to public contempt, ridicule, hatred and violence; (c) convey the impression that the Firm engages in illegal, wrongful, greedy, unprofessional and unethical conduct; (d) detract from the Firm's respect in the community; (e) subject the Firm and its employees to severe emotional distress, mental anguish, embarrassment and/or humiliation for which the Firm has had to take protective and remedial action; and (f) interfere with the Firm's professional work.

156. Each of the aforementioned false and defamatory statements, innuendoes and implications was understood by third parties, including readers in Philadelphia County, to pertain to, and defame, the Firm.

157. As a proximate result of Defendants' malicious, intentional and reckless conduct as set forth above and herein, the Firm is entitled to such damages as will compensate it for the

injury to its reputation, resultant out-of-pocket costs and expenses, and punitive damages to punish Defendants for their conduct and deter them and others similarly situated from like acts in the future.

WHEREFORE, Plaintiff Kline & Specter, P.C. demands judgment against Defendants in an amount of compensatory damages in excess of the arbitration jurisdictional limit together with interest and costs, punitive damages in an amount which will punish the Defendants for their conduct and deter them and others similarly situated from like acts in the future, and such other relief and this Court may deem just and warranted.

COUNT II-COMMERICAL DISPARAGEMENT
(Plaintiff vs. Defendants)

158. Plaintiff incorporates by reference the averments contained in the foregoing paragraphs of Plaintiff's Complaint as though fully set forth herein at length.

159. The above-mentioned statements of Defendants were known by Defendants to be totally false and commercially disparaging and/or were made in reckless disregard of the truth or falsity of the statements.

160. The above-mentioned false and commercially disparaging statements were made by Defendants with the intent to cause financial loss to the Firm or, if not, should have been reasonably known by Defendants to recognize that the publication would result in financial loss.

161. As a result of the above-mentioned false and commercially disparaging statements, the Firm has suffered financial loss.

WHEREFORE, Plaintiff Kline & Specter, P.C. demands judgment against Defendants in an amount of compensatory damages in excess of the arbitration jurisdictional limit together with interest and costs, punitive damages in an amount which will punish the Defendants for

their conduct and deter them and others similarly situated from like acts in the future, and such other relief and this Court may deem just and warranted.

COUNT III-WRONGFUL SOLICITATION
(Plaintiff vs. Defendants)

162. Plaintiff incorporates by reference the averments contained in the foregoing paragraphs of Plaintiff's Complaint as though fully set forth herein at length.

163. With the intent of promoting or facilitating its commission, Thomas Bosworth engaged, and solicited many other persons to engage, in specific conduct which could result in death, violence, antisemitic bigotry, harassment, loss of reputation and economic harm to the Firm and its employees.

164. This wrongful encouragement and solicitation caused many people to advocate for the death, violence, antisemitic bigotry, harassment, loss of reputation and economic harm to the firm and its employees.

165. This wrongful conduct by Mr. Bosworth and the conduct he caused others to commit has caused harm, loss of reputation, financial loss and risk of physical violence and death to the employees of Kline & Specter.

WHEREFORE, Plaintiff Kline & Specter, P.C. demands judgment against Defendants in an amount of compensatory damages in excess of the arbitration jurisdictional limit together with interest and costs, punitive damages in an amount which will punish the Defendants for their conduct and deter them and others similarly situated from like acts in the future, and such other relief and this Court may deem just and warranted.

COUNT IV-HARASSMENT
(Plaintiff vs. Defendants)

166. Plaintiff incorporates by reference the averments contained in the foregoing paragraphs of Plaintiff's Complaint as though fully set forth herein at length.

167. With the intent to harass, annoy and/or alarm the employees of Kline & Specter, Tomas Bosworth has (1) engaged in the above-stated course of conduct and/or repeatedly committed acts which serve no legitimate purpose and (2) communicated to and about Kline & Specter threatening and/or obscene words, language, pictures and videos and (3) caused others to communicate to and about Kline & Specter threatening and/or obscene words, language and emojis.

168. This conduct has caused harm, loss of reputation, financial loss and risk of physical violence and death to the employees of Kline & Specter.

WHEREFORE, Plaintiff Kline & Specter, P.C. demands judgment against Defendants in an amount of compensatory damages in excess of the arbitration jurisdictional limit together with interest and costs, punitive damages in an amount which will punish the Defendants for their conduct and deter them and others similarly situated from like acts in the future, and such other relief and this Court may deem just and warranted.

Respectfully Submitted,

LAMB McERLANE PC

Dated: March 10, 2023

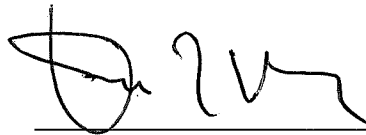
By: /s/ Joseph R. Podraza, Jr.
Joseph R. Podraza, Jr., Esquire
jpodraza@lambmcerlane.com
William H. Trask, Esquire
wtrask@lambmcerlane.com
One South Broad Street, Suite 1500
Philadelphia, PA 19107
(215) 609-3170 (direct)

VERIFICATION

I, Thomas R. Kline, Esquire, state that I am authorized to take this verification for Kline Specter, P.C., and verify that the statements in the foregoing complaint are true and correct to the best of my knowledge, information, and belief. I do further understand that these statements are made subject to the penalties of 18 Pa.C.S. Sec. 4904, relating to unsworn falsification to authorities.

Mar. 10, 2023

Date



Thomas R. Kline

VERIFICATION

I, Shanin Specter, Esquire, state that I am authorized to take this verification for Kline Specter, P.C., and verify that the statements in the foregoing complaint are true and correct to the best of my knowledge, information, and belief. I do further understand that these statements are made subject to the penalties of 18 Pa.C.S. Sec. 4904, relating to unsworn falsification to authorities.

Mar. 10, 2023

Date



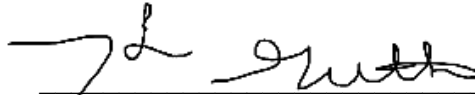
Shanin Specter

VERIFICATION

I, Amy Guth, Esquire, state that I am authorized to take this verification for Kline Specter, P.C., and verify that the statements in the foregoing complaint are true and correct to the best of my knowledge, information, and belief. I do further understand that these statements are made subject to the penalties of 18 Pa.C.S. Sec. 4904, relating to unsworn falsification to authorities.

Mar. 10, 2023

Date



Amy Guth

Exhibit A

AGREEMENT

As an attorney to be employed at Kline & Specter, P.C. [hereinafter "K&S"], I acknowledge the growth of the firm and its success, and understand that the equity partners, Shanin Specter and Tom Kline, value my role and the roles of my colleagues. I also acknowledge the benefits that K&S will provide to me personally and professionally. I also understand the need, given the size and growth of the firm, and its position in the community, to protect the firm's stability, both now and into the future, through this agreement.

As such, I acknowledge the following terms and conditions of employment at K&S:

- (1) Employment is on an at-will basis;
- (2) As long as I am an employee of the firm, I will practice law only for the firm. All revenue derived from my practice of law will be paid to the firm.
- (3) Any potential cases/clients that come to me will be presented to the firm for handling. In the event that I originate the client in a matter that has no referral lawyer and the firm keeps the case, I will receive as an origination fee one-third of the firm's gross fee, provided I am employed by the firm when the fee is paid to the firm. This origination fee is not intended to be a limitation on my compensation in relation to this case, but rather is a floor. In the event the firm does not keep the case but rather refers it elsewhere, I will receive one-half of the firm's referral fee provided I am employed by the firm when the fee is paid to the firm.
- (4) K&S will pay me an annualized salary ("draw") along with significant non-salary benefits, including periodic distributions expected in June and December of each year, based upon my professional performance and contribution to the success of cases, whose timing and amounts are at the sole discretion of the equity partners;
- (5) K&S will provide my disability insurance of 60% of my total income, with disability payments up to \$10,000 per month, with terms per the insurance policy;
- (6) I may leave K&S at-will, but I agree to provide at least two (2) months notice to K&S prior to my departure, which K&S may utilize in whole or in part. This will permit an orderly transition to a newly assigned attorney. I will first notify Tom Kline and Shanin Specter of my intention to leave, who will then contact the clients and referral counsel before I have any contact with any client or referral lawyer regarding my departure. This will apply to all cases, open and pending, and any person who contacted me or the firm regarding a potential case;
- (7) In the event I leave K&S for any reason, and any person decides to hire me to continue to represent him/her/them, I will recognize the current referral attorney as referral counsel under the same arrangements as in place with K&S, and will also pay K&S one-third of the gross amount of any fee generated at the time of distribution. For example, if a case departs with me and settles for \$1 million and the gross attorneys' fee was forty (40%) percent, and if there was a one-third referral fee, Kline & Specter shall be paid \$133,333.33 at the time of distribution. In the event there is no referral lawyer, I will pay to the firm one-half of the gross fee generated in relation to this file. For example, if a case departs with me and thereafter settles for \$1 million and the attorneys' fee was forty (40%) percent of the gross recovery, and there was no referral lawyer, Kline & Specter shall be paid \$200,000 at the time of distribution. I will explain this arrangement to any client before

undertaking his/her/their representation. I will not, however, solicit any client to leave K&S either before or after notice to K&S of my expected departure;

- (8) If, in the event of my departure, a client chooses me as his/her/their counsel, I will, prior to the file leaving this office, cause to be repaid to K&S all of the file costs on the file and will assume full responsibility as guarantor in the place of K&S for any obligations (such as letters of protection, etc.);
- (9) In the event of my departure, I will retain no documents, files, client or referral counsel lists, case lists, computer data or any other information of or relating to K&S, its clients or its files. I recognize that all such things and information are the exclusive property of K&S. I will not share any client or firm information with anyone;
- (10) If I depart and any clients or referral counsel follow me, I give K&S the right to have an auditor/accountant audit my new practice's books to determine compliance with this agreement and I will provide annual reports regarding the status of any departed files;
- (11) I agree to the enforcement of the agreement by either binding arbitration under the Arbitration Act of 1980 or through court action, at the option of K&S;
- (12) Before accepting any new employment, I will inform the new firm of the obligations herein;
- (13) I acknowledge the enormous benefits of working at K&S and the tremendous investment of Tom Kline and Shanin Specter in K&S of millions of dollars and years of work in building the firm to a place where I expect to derive both professional and personal benefits, and hence the need for the formalization of our relationship which all expect to advance in a prosperous and collegial way;
- (14) I recognize that all attorneys will benefit by this agreement, as will the entire firm by helping to ensure the prospects of the firm in the near and long-term, even subsequent to the departure of any attorney, including an equity partner; and
- (15) This constitutes the entire agreement on the subjects herein. There are no oral or other understandings. Any modification of this must be in writing.

Dated: 4/12/17


ATTORNEY NAME

THOMAS BOSWORTH