

**IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,  
PENNSYLVANIA**

FRIDAY & COX, LLC,

CIVIL DIVISION

Plaintiff,

Docket No.:

vs.

FINDLAW; WEST PUBLISHING  
CORPORATION t/d/b/a FINDLAW; and  
THOMSON REUTERS HOLDINGS, INC.,

**PRAECIPE TO ISSUE WRIT OF  
SUMMONS**

Defendants.

Filed on behalf of Plaintiff:  
Friday & Cox, LLC

Counsel of Record for this Party:  
Peter D. Friday, Esquire  
Pa. I.D. No.: 48746  
[pfriday@fridaylaw.com](mailto:pfriday@fridaylaw.com)

Joshua S. Licata, Esquire  
Pa. I.D. No.: 318783  
[jlicata@fridaylaw.com](mailto:jlicata@fridaylaw.com)

Friday & Cox LLC  
1405 McFarland Road  
Pittsburgh, PA 15216  
T: (412) 561-4290  
F: (412) 561-4291

**JURY TRIAL DEMANDED**

**Exhibit "A"**

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,  
PENNSYLVANIA

FRIDAY & COX, LLC,

CIVIL DIVISION

Plaintiff,

Docket No.:

vs.

FINDLAW; WEST PUBLISHING  
CORPORATION t/d/b/a FINDLAW; and  
THOMSON REUTERS HOLDINGS, INC.,

Defendants.

**PRAECIPE TO ISSUE WRIT OF SUMMONS**

TO THE PROTHONOTARY:

Kindly issue a Writ of Summons in Civil Action against the above-named defendants at  
the following addresses:

FindLaw  
610 Opperman Drive  
Eagan, Minnesota 55123

West Publishing Company t/d/b/a FindLaw  
610 Opperman Drive  
Eagan, Minnesota 55123

Thomson Reuters Holdings, Inc.  
3 Times Square  
New York, New York 10036

Respectfully submitted,



Peter D. Friday, Esquire  
Pa. I.D. No.: 48746

Joshua S. Licata, Esquire  
Pa. I.D. No.: 318783  
*Attorneys for Plaintiff*

**IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,  
PENNSYLVANIA**

FRIDAY & COX, LLC,

CIVIL DIVISION

Plaintiff,

Docket No.: GD-18-002983

vs.

FINDLAW; WEST PUBLISHING  
CORPORATION t/d/b/a FINDLAW; and  
THOMSON REUTERS HOLDINGS, INC.,

**PRAECIPE TO REISSUE WRIT OF  
SUMMONS**

Defendants.

Filed on behalf of Plaintiff:  
Friday & Cox, LLC

Counsel of Record for this Party:  
Peter D. Friday, Esquire  
Pa. I.D. No.: 48746  
[pfriday@fridaylaw.com](mailto:pfriday@fridaylaw.com)

Joshua S. Licata, Esquire  
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IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,  
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FINDLAW; WEST PUBLISHING  
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Eagan, MN 55123

West Publishing Corporation t/d/b/a FindLaw  
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Eagan, MN 55123

Thomson Reuters Holdings, Inc.  
3 Times Square  
New York, NY 10036

Respectfully submitted,

Dated: March 27, 2018

/s/ Peter D. Friday  
Peter D. Friday, Esquire  
Pa. I.D. No.: 48746

Joshua S. Licata, Esquire  
Pa. I.D. No.: 318783  
*Attorneys for Plaintiff*

**IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,  
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FRIDAY & COX, LLC,

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Plaintiff,

Docket No.: GD-18-002983

vs.

FINDLAW; WEST PUBLISHING  
CORPORATION t/d/b/a FINDLAW; and  
THOMSON REUTERS HOLDINGS, INC.,

**COMPLAINT IN CIVIL ACTION**

Defendants.

Filed on behalf of Plaintiff:  
Friday & Cox, LLC

Counsel of Record for this Party:  
Peter D. Friday, Esquire  
Pa. I.D. No.: 48746  
[pfriday@fridaylaw.com](mailto:pfriday@fridaylaw.com)

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Defendants.

**NOTICE TO DEFEND**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

**YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.**

**IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.**

**Lawyer Referral Service  
Allegheny County Bar Association  
11<sup>th</sup> Floor, Koppers Building  
436 Seventh Avenue  
Pittsburgh, PA 15219  
(412) 261-5555**

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,  
PENNSYLVANIA

FRIDAY & COX, LLC,

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Plaintiff,

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FINDLAW; WEST PUBLISHING  
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Defendants.

**COMPLAINT IN CIVIL ACTION**

Plaintiff Friday & Cox, LLC, by and through its attorneys, Peter D. Friday, Esquire, Joshua S. Licata, Esquire and Friday & Cox LLC, complains and alleges as follows:

1. Plaintiff Friday & Cox, LLC is a Pennsylvania limited liability company with a principal place of business located at 1405 McFarland Road, Pittsburgh, Allegheny County, Pennsylvania 15216.

2. Defendant FindLaw is an assumed name with a principal place of business located at 610 Opperman Drive, Eagan, Minnesota 55123.

3. Defendant West Publishing Company trading and doing business as FindLaw is a Minnesota corporation with a principal place of business located at 610 Opperman Drive, Eagan, Minnesota 55123.

4. Defendant Thomson Reuters Holdings, Inc. is a Delaware corporation with a principal place of business located at 3 Times Square, New York, New York 10036.

5. Defendants will be known collectively as "FindLaw" throughout this Complaint in Civil Action.

6. Plaintiff is a law firm which operates a corporate website with the following address: [www.fridaylaw.com](http://www.fridaylaw.com) (“the website”) and a corporate Facebook page.

7. The FindLaw defendants are corporate entities which market website developing to attorneys across the United States. FindLaw advertises on the Internet to the public for the purpose of encouraging the public to find lawyers through their company’s marketing services.

8. FindLaw sells a variety of advertising to attorneys including, but not limited to, website developing services. FindLaw also markets a social media engagement product which is meant to increase plaintiff’s social media presence and optimize plaintiff’s Facebook page to improve the SEO of plaintiff’s Friday & Cox website.

9. Plaintiff hired FindLaw in order to increase its exposure to potential legal clients by means of the Internet and social media.

10. Plaintiff entered into a series of written contracts with FindLaw beginning in 2010 for advertising, the redesign of the Friday & Cox website, and improvement of the search engine optimization (“SEO”) of the Friday & Cox website.

11. Plaintiff began paying FindLaw for the services they provided on August 26, 2010 and has paid a total of \$297,202.31 to FindLaw since that time. Plaintiff stopped paying FindLaw any sum of money beginning October 24, 2017.

12. As a direct and proximate result of the fraud, misrepresentations, breaches of contract, breaches of both implied and express warranties, negligence, carelessness and recklessness of FindLaw, plaintiff sustained actual monetary damages, and has wasted money and time on Findlaw’s ineffective marketing and advertising services that could have been allocated to more productive business, advertising and/or marketing uses.



**COUNT I**

***Plaintiff v. FindLaw; West Publishing Company t/d/b/a FindLaw and Thomson Reuters Holdings, Inc.***  
**Breach of Contract**  
**(Website)**

13. All preceding paragraphs of this Complaint are incorporated herein by reference.

14. FindLaw breached the terms of their contracts with plaintiff and its duty of good faith and fair dealing, including specific promises represented in advertising and by statements made to plaintiff to increase plaintiff's exposure to potential legal clients, which were relied upon by plaintiff to its detriment.

15. Pursuant to the terms of FindLaw's Master Service Agreement (MSA), FindLaw is and was contractually obligated to provide an "optimized" website to be used by plaintiff in order to connect with potential legal clients. However, the Friday & Cox website was not properly optimized for anything relating to auto accidents, injuries and workers' compensation cases in the Pittsburgh and Erie, Pennsylvania geographic areas.

16. Specifically, FindLaw has failed to properly optimize the Friday & Cox website in accordance with the Master Service Agreement in the following particulars:

- a) Each page on the Friday & Cox website has less than half of the necessary SEO elements necessary to have a website/webpage rank on the Google search engine;
- b) On average, each page, article and blog post has less than the 300 minimum words per page necessary to be indexed by Google, Bing, Yahoo and other similar search engines;
- c) Each page, blog post and article lacks a clear keyword phrase such as "Pittsburgh personal injury lawyers";
- d) By conducting SEO tests it has been determined that the keyword density of each page is zero (0) when it should be at approximately one (1) percent;
- e) Each page lacks a clear geographic focus such as Allegheny County, Pittsburgh, Erie and/or Pennsylvania;

- f) The Friday & Cox website makes no mention of plaintiff's Erie, Pennsylvania office, the contact information for the Erie, Pennsylvania office or any of the surrounding counties such as Warren and Crawford County;
- g) The Friday & Cox website makes no mention of the Allegheny County/Pittsburgh metropolitan area or the surrounding counties such as Westmoreland, Washington, Beaver and Butler counties;
- h) The Friday & Cox website makes no mention of the county seats within the Pittsburgh and Erie, Pennsylvania metropolitan areas;
- i) The Friday & Cox website makes no mention of heavily populated areas that are not county seats including, but not limited to, Bethel Park and McKeesport;
- j) The Friday & Cox website makes no mention of large employers such as county/state governments, Wal-Mart, UPS, FedEx, universities, hospitals and healthcare systems, which limits the scope of contact with potential clients;
- k) The video of partner, Peter Friday, resides on the website itself and not a YouTube channel which slows down page load time and negatively impacts SEO;
- l) The video is not properly optimized and does not point to each page which limits SEO because pages with videos are much more inclined to be picked up by search engines;
- m) None of the pages on the Friday & Cox website contain relevant geographic or practice area focused pictures with proper alt-text, which are necessary for SEO.
- n) The blog posts present on the Friday & Cox website are duplicate blog posts, as they are present on hundreds of different FindLaw sites across the country;
- o) FindLaw charges plaintiff a monthly fee for a Web Advantage linking product that is worthless and irrelevant because inbound linking is obsolete and there are no tangible links that are built every month;
- p) The Friday & Cox website makes no mention of Pennsylvania specific worker's compensation laws such as the Heart and Lung Act, the coming and going rule, the importance of reporting a work injury immediately or the importance of seeking medical attention following a work related injury;
- q) The Friday & Cox website makes no mention of Pennsylvania full and/or limited tort laws or their implications in a Pennsylvania auto accident;

- r) The Friday & Cox website does nothing to attract attention from those seeking specific types of attorneys including, but not limited to, Spanish speaking attorneys;
- s) Pennsylvania has an undocumented worker population of approximately six (6) percent and the website makes no mention of plaintiff's experience handling cases on behalf of undocumented workers;
- t) The website is not optimized for those individuals injured at work in any industry including, but not limited to, healthcare workers, laborers, those in the shipping industry, those in the manufacturing industry and those in the oil and gas industry;
- u) The website is not optimized for premises liability cases of any type including, but not limited to, dog bites and slip and falls; and
- v) Whiplash, neck and back injuries are the most common types of injuries suffered at work and in auto accidents, and the website makes no mention of these injuries or the types of accidents that cause them including, but not limited to, falls, rear end collisions and side impact collisions.

WHEREFORE, plaintiff demands judgment against defendants in an amount in excess of the jurisdictional limits of compulsory arbitration, together with court costs, interest and such other and further relief as permitted by the Court.

**COUNT II**

***Plaintiff v. FindLaw; West Publishing Company t/d/b/a FindLaw and Thomson Reuters Holdings, Inc.***  
**Breach of Contract**  
**(Social Media)**

17. All preceding paragraphs of this Complaint are incorporated herein by reference.

18. FindLaw breached the terms of their contracts with plaintiff and its duty of good faith and fair dealing, including specific promises represented in advertising and by statements made to plaintiff to increase plaintiff's exposure to potential legal clients by utilizing social media, which were relied upon by plaintiff to its detriment.

19. FindLaw's social media engagement product has not performed as promised and has not functioned to engage more potential client's with plaintiff's Facebook page to its detriment.

20. FindLaw has failed to optimize plaintiff's Facebook page in order to increase plaintiff's social media presence with their "social media engagement" product in the following particulars:

- a) Plaintiff's Facebook page has only 68 "Likes" and when FindLaw posts to plaintiff's Facebook page, which are nothing more than links to duplicate blog posts, no one "Likes" them or engages in the Facebook page, rendering the social media engagement product worthless;
- b) The more "Likes" a Facebook page has the more engaging the Facebook page is, and FindLaw has done nothing to increase plaintiff's "Likes"; and
- c) FindLaw has failed to optimize plaintiff's Facebook page which impacts the SEO of the website, and an unoptimized Facebook page is unlikely to rank on Google searches outside of Facebook.

WHEREFORE, plaintiff demands judgment against defendants in an amount in excess of the jurisdictional limits of compulsory arbitration, together with court costs, interest and such other and further relief as permitted by the Court.

### **COUNT III**

***Plaintiff v. FindLaw; West Publishing Company t/d/b/a FindLaw and Thomson Reuters Holdings, Inc.***

#### **Fraud**

21. All preceding paragraphs of this Complaint are incorporated herein by reference.

22. FindLaw made material false representations to plaintiff in order to induce plaintiff into a series of contracts for website design, SEO marketing services, internet attorney marketing services and social media engagement marketing services or alternatively, concealed material facts from plaintiff that, had those facts been known by plaintiff, plaintiff would not have entered into such contract.

23. FindLaw knew that its representations were false when made or the representations were asserted without knowledge of the truth of the representation. FindLaw also knew the concealed facts were material to the subject contract.

24. FindLaw intended that plaintiff rely on the representations, and plaintiff reasonably relied on FindLaw's representations.

25. Specifically, plaintiff reasonably relied on the following representations made by FindLaw:

- a) That FindLaw would increase plaintiff's online advertising and/or marketing presence;
- b) That FindLaw would increase plaintiff's social media presence;
- c) That FindLaw would optimize plaintiff's website to attract potential legal clients;
- d) That FindLaw would optimize plaintiff's Facebook page to attract potential legal clients; and
- e) That FindLaw would advertise and/or market plaintiff's law firm in a good faith and reasonable manner.

WHEREFORE, plaintiff demands judgment for damages against defendant in an amount in excess of the jurisdictional limits of compulsory arbitration, together with court costs, interest and such other and further relief as permitted by the Court.

**COUNT IV**

***Plaintiff v. FindLaw; West Publishing Company t/d/b/a FindLaw and Thomson Reuters Holdings, Inc.***

**Unfair Trade Practices and Consumer Protection Law**

26. All preceding paragraphs of this Complaint are incorporated herein by reference.

27. At all relevant times, FindLaw represented that goods or services have characteristics, or benefits which they do not have, in violation of the Pennsylvania Unfair Trade Practices and Consumer Protection Law at 73 P.S. § 201-1, et seq.

28. FindLaw represented that an agreement confers or involves rights, remedies, or obligations which it does not have or involve, or which are prohibited by law, in violation of 73 P.S. § 201-1, et seq., and failed to disclose information concerning goods or services which was known at the time of the transaction thereby intending to induce plaintiff into entering into the referenced contractual agreements, knowing that it would not have entered into such an agreement had such information been disclosed, in violation of 73 P.S. § 201-1, et seq.

29. These representations, acts and omissions made by FindLaw in its dealings with plaintiff, constitute “unfair methods of competition” and “unfair or deceptive acts or practices” as defined in 73 P.S. § 201-1, et seq.

30. All of the foregoing violations of 73 P.S. § 201-1, et seq. were committed knowingly and intentionally and plaintiff relied on such representations, acts and omissions to its damage and detriment.

WHEREFORE, plaintiff demands judgment for compensatory, exemplary and all other damages and costs recoverable under 73 P.S. § 201.1, et seq. against defendants in an amount in excess of the jurisdictional limits of compulsory arbitration, together with court costs, interest and such other and further relief as permitted by the Court.

**COUNT V**

***Plaintiff v. FindLaw; West Publishing Company t/d/b/a FindLaw and Thomson Reuters Holdings, Inc.***

**Breach of Warranty**

31. All preceding paragraphs of this Complaint are incorporated herein by reference.

32. At all relevant times, FindLaw promoted and sold website design and redesign services, SEO marketing services, internet attorney marketing services and social media engagement marketing services, and in so doing, FindLaw expressly and impliedly warranted to

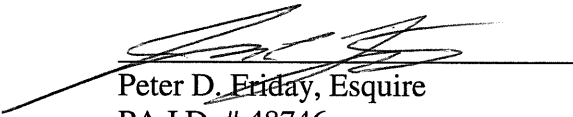
the public and to plaintiff that its products and services were of merchantable quality for use for which they were intended.

33. At all relevant times, FindLaw promoted and sold website design and redesign services, SEO marketing services, internet attorney marketing services and social media engagement marketing services that were not of merchantable quality for their intended use as expressly and impliedly warranted by FindLaw, and FindLaw knew, or should have known, that its products and services were not of merchantable quality for use for which they were intended by the public, including plaintiff.

34. As a result of FindLaw's breach of its express and implied warranties, plaintiff suffered the damages outlined above due to its detrimental reliance on FindLaw's express and implied warranties.

WHEREFORE, plaintiff demands judgment against defendants in an amount in excess of the jurisdictional limits of compulsory arbitration, together with court costs, interest and such other and further relief as permitted by the Court.

Respectfully submitted,



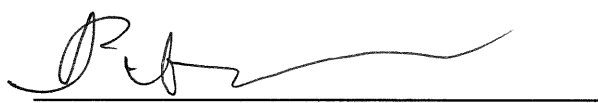
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Joshua S. Licata, Esquire  
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Friday & Cox LLC  
1405 McFarland Road  
Pittsburgh, PA 15216  
T: (412) 561-4290  
F: (412) 561-4291

**VERIFICATION**

I, Peter D. Friday, being duly sworn according to law, depose and say that the facts contained in the foregoing are true and correct to the best of my knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

  
Peter D. Friday



**CERTIFICATE OF SERVICE**

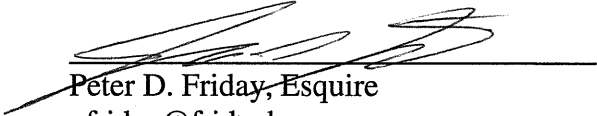
I, the undersigned, hereby certify that on March 28, 2018 a true and correct copy of Plaintiff's Complaint in Civil Action was served by first class U.S. mail, postage prepaid, and/or certified mail upon Defendants, to-wit:

FindLaw  
610 Opperman Drive  
Eagan, MN 55123

West Publishing Corporation t/d/b/a FindLaw  
610 Opperman Drive  
Eagan, MN 55123

Thomson Reuters Holdings, Inc.  
3 Times Square  
New York, NY 10036

Friday & Cox LLC



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pfriday@fridaylaw.com  
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Joshua S. Licata, Esquire  
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Attorneys for Plaintiff

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IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,  
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FRIDAY & COX, LLC,

CIVIL DIVISION

Plaintiff,

Docket No.: GD-18-002983

vs.

FINDLAW; WEST PUBLISHING  
CORPORATION t/d/b/a FINDLAW; and  
THOMSON REUTERS HOLDINGS, INC.,

**PROOF OF SERVICE BY CERTIFIED  
MAIL ON DEFENDANT FINDLAW  
PURSUANT TO PA.R.C.P. § 405(c)**

Defendants.

Filed on behalf of Plaintiff:  
Friday & Cox, LLC

Counsel of Record for this Party:  
Peter D. Friday, Esquire  
Pa. I.D. No.: 48746  
[pfriday@fridaylaw.com](mailto:pfriday@fridaylaw.com)

Joshua S. Licata, Esquire  
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**JURY TRIAL DEMANDED**

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Plaintiff,

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Defendants.

**PROOF OF SERVICE BY CERTIFIED MAIL ON DEFENDANT FINDLAW  
PURSUANT TO PA.R.C.P. § 405(c)**

Plaintiff, Friday & Cox, LLC, by and through its attorneys, Peter D. Friday, Esquire, Joshua S. Licata, Esquire and Friday & Cox, LLC, files the instant proof of service as follows:

1. The instant case was initiated by Writ of Summons on March 1, 2018, and the Writ of Summons was reissued as to all defendants on March 27, 2018.
2. On March 28, 2018, plaintiff filed a Complaint in Civil Action against all defendants.
3. On or about, March 28, 2018, a copy of the Reissued Writ of Summons and plaintiff's Complaint in Civil Action was mailed to defendant, FindLaw, via certified mail, return receipt requested.
4. Defendant FindLaw received said Writ of Summons and Complaint in Civil Action on April 3, 2018, as reflected on the United States Postal Service return receipt, a copy of which is attached hereto as Exhibit A.

Respectfully submitted,

BY: /s/ Peter D. Friday  
Peter D. Friday  
Attorney for Plaintiff  
PA I.D. # 48746

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on April 17, 2018 a true and correct copy of Proof of Service by Certified Mail on Defendant FindLaw was served by first class U.S. mail, postage prepaid, and/or certified mail upon Defendants, to-wit:

FindLaw  
610 Opperman Drive  
Eagan, MN 55123

West Publishing Corporation t/d/b/a FindLaw  
610 Opperman Drive  
Eagan, MN 55123

Thomson Reuters Holdings, Inc.  
3 Times Square  
New York, NY 10036

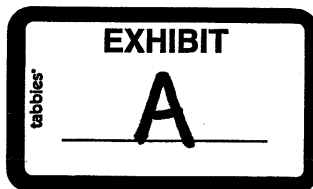
Friday & Cox LLC

/s/ Peter D. Friday

Peter D. Friday, Esquire  
pfriday@fridaylaw.com  
PA I.D. # 48746

Joshua S. Licata, Esquire  
jlicata@fridaylaw.com  
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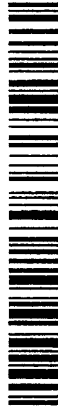


**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Findlaw  
 610 Opperman Drive  
 Eagan, MN 55123



9590 9402 3688 7335 1160 56

2. Article Number (Transfer from service label)

7016 0910 0002 2878 3295

Form 3811, July 2015 PSN 7530-02-000-9053

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature R Heers  Agent  
 Addressee

B. Received by (Printed Name) R Heers C. Date of Delivery

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type
- Adult Signature Restricted Delivery
  - Certified Mail®
  - Collect on Delivery
  - Insured Mail (over \$500)
  - Priority Mail Express®
  - Registered Mail™
  - Registered Mail Restricted Delivery
  - Return Receipt for Merchandise
  - Signature Confirmation™
  - Signature Confirmation Restricted Delivery

Domestic Return Receipt

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,  
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**PROOF OF SERVICE BY CERTIFIED  
MAIL ON DEFENDANT WEST  
PUBLISHING COMPANY PURSUANT  
TO PA.R.C.P. § 405(c)**

Defendants.

Filed on behalf of Plaintiff:  
Friday & Cox, LLC

Counsel of Record for this Party:  
Peter D. Friday, Esquire  
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Defendants.

**PROOF OF SERVICE BY CERTIFIED MAIL ON DEFENDANT WEST PUBLISHING  
COMPANY PURSUANT TO PA.R.C.P. § 405(c)**

Plaintiff, Friday & Cox, LLC, by and through its attorneys, Peter D. Friday, Esquire, Joshua S. Licata, Esquire and Friday & Cox, LLC, files the instant proof of service as follows:

1. The instant case was initiated by Writ of Summons on March 1, 2018, and the Writ of Summons was reissued as to all defendants on March 27, 2018.
2. On March 28, 2018, plaintiff filed a Complaint in Civil Action against all defendants.
3. On or about, March 28, 2018, a copy of the Reissued Writ of Summons and plaintiff's Complaint in Civil Action was mailed to defendant, West Publishing Company, via certified mail, return receipt requested.
4. Defendant West Publishing Company received said Writ of Summons and Complaint in Civil Action on April 3, 2018, as reflected on the United States Postal Service return receipt, a copy of which is attached hereto as Exhibit A.

Respectfully submitted,



BY: /s/ Peter D. Friday  
Peter D. Friday  
Attorney for Plaintiff  
PA I.D. # 48746

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on April 17, 2018 a true and correct copy of Proof of Service by Certified Mail on Defendant West Publishing Company was served by first class U.S. mail, postage prepaid, and/or certified mail upon Defendants, to-wit:

FindLaw  
610 Opperman Drive  
Eagan, MN 55123

West Publishing Corporation t/d/b/a FindLaw  
610 Opperman Drive  
Eagan, MN 55123

Thomson Reuters Holdings, Inc.  
3 Times Square  
New York, NY 10036

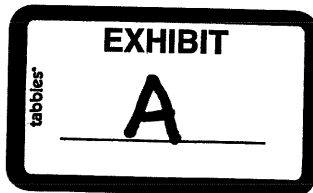
Friday & Cox LLC

/s/ Peter D. Friday

Peter D. Friday, Esquire  
pfriday@fridaylaw.com  
PA I.D. # 48746

Joshua S. Licata, Esquire  
jlicata@fridaylaw.com  
PA I.D. # 318783  
Attorneys for Plaintiff

Friday & Cox LLC  
1405 McFarland Road  
Pittsburgh, PA 15216  
T: (412) 561-4290  
F: (412) 561-4291



**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

West Publishing Company  
 610 Opperman Drive  
 Eagan, MN 55123




9590 9402 3688 7335 1160 63

2. Article Number (Transfer from service label)

7017 0660 0000 1569 8327

PS Form 3811, July 2015 PSN 7530-02-000-9053

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature   Agent  
 Addressee

B. Received by (Printed Name) Heiss C. Date of Delivery

D. Is delivery address different from item 1?  Yes  No  
 If YES, enter delivery address below:

3. Service Type
- Adult Signature Restricted Delivery
  - Certified Mail®
  - Collect on Delivery
  - Collect on Delivery Restricted Delivery
  - Insured Mail (over \$500)
  - Insured Mail Restricted Delivery
  - Priority Mail Express®
  - Registered Mail™
  - Registered Mail Restricted Delivery
  - Return Receipt for Merchandise
  - Signature Confirmation™
  - Signature Confirmation Restricted Delivery

Domestic Return Receipt

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,  
PENNSYLVANIA

FRIDAY & COX, LLC,

CIVIL DIVISION

Plaintiff,

Docket No.: GD-18-002983

vs.

FINDLAW; WEST PUBLISHING  
CORPORATION t/d/b/a FINDLAW; and  
THOMSON REUTERS HOLDINGS, INC.,

**PROOF OF SERVICE BY CERTIFIED  
MAIL ON DEFENDANT THOMSON  
REUTERS HOLDINGS, INC.  
PURSUANT TO PA.R.C.P. § 405(c)**

Defendants.

Filed on behalf of Plaintiff:  
Friday & Cox, LLC

Counsel of Record for this Party:  
Peter D. Friday, Esquire  
Pa. I.D. No.: 48746  
[pfriday@fridaylaw.com](mailto:pfriday@fridaylaw.com)

Joshua S. Licata, Esquire  
Pa. I.D. No.: 318783  
[jlicata@fridaylaw.com](mailto:jlicata@fridaylaw.com)

Friday & Cox LLC  
1405 McFarland Road  
Pittsburgh, PA 15216  
T: (412) 561-4290  
F: (412) 561-4291

**JURY TRIAL DEMANDED**

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,  
PENNSYLVANIA

FRIDAY & COX, LLC,

CIVIL DIVISION

Plaintiff,

Docket No.: GD-18-002983

vs.

FINDLAW; WEST PUBLISHING  
CORPORATION t/d/b/a FINDLAW; and  
THOMSON REUTERS HOLDINGS, INC.,

Defendants.

**PROOF OF SERVICE BY CERTIFIED MAIL ON DEFENDANT THOMSON REUTERS  
HOLDINGS, INC. PURSUANT TO PA.R.C.P. § 405(c)**

Plaintiff, Friday & Cox, LLC, by and through its attorneys, Peter D. Friday, Esquire, Joshua S. Licata, Esquire and Friday & Cox, LLC, files the instant proof of service as follows:

1. The instant case was initiated by Writ of Summons on March 1, 2018, and the Writ of Summons was reissued as to all defendants on March 27, 2018.

2. On March 28, 2018, plaintiff filed a Complaint in Civil Action against all defendants.

3. On or about, March 28, 2018, a copy of the Reissued Writ of Summons and plaintiff's Complaint in Civil Action was mailed to defendant, Thomson Reuters Holdings, Inc., via certified mail, return receipt requested.

4. Defendant Thomson Reuters Holdings, Inc. received said Writ of Summons and Complaint in Civil Action on April 2, 2018, as reflected on the United States Postal Service return receipt, a copy of which is attached hereto as Exhibit A.

Respectfully submitted,

BY: /s/ Peter D. Friday  
Peter D. Friday  
Attorney for Plaintiff  
PA I.D. # 48746

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on April 17, 2018 a true and correct copy of Proof of Service by Certified Mail on Defendant Thomson Reuters Holdings, Inc. was served by first class U.S. mail, postage prepaid, and/or certified mail upon Defendants, to-wit:

FindLaw  
610 Opperman Drive  
Eagan, MN 55123

West Publishing Corporation t/d/b/a FindLaw  
610 Opperman Drive  
Eagan, MN 55123

Thomson Reuters Holdings, Inc.  
3 Times Square  
New York, NY 10036

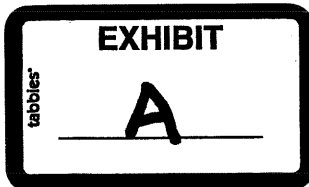
Friday & Cox LLC

/s/ Peter D. Friday

Peter D. Friday, Esquire  
pfriday@fridaylaw.com  
PA I.D. # 48746

Joshua S. Licata, Esquire  
jlicata@fridaylaw.com  
PA I.D. # 318783  
Attorneys for Plaintiff

Friday & Cox LLC  
1405 McFarland Road  
Pittsburgh, PA 15216  
T: (412) 561-4290  
F: (412) 561-4291



**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Thomson Reuters Holdings, Inc.  
 3 Times Square  
 New York, NY 10036



9590 9402 3688 7335 1160 70

2. Article Number (Transfer from service label)

7017 0660 0000 1569 8334

PS Form 3811, July 2015 PSN 7530-02-000-9053

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  Agent  
 X *[Signature]*  Addressee

B. Received by (Printed Name) C. Date of Delivery  
 HC *[Signature]*

D. Is delivery address different from item 1?  Yes  No  
 If YES, enter delivery address below:

3. Service Type
- Adult Signature
  - Adult Signature Restricted Delivery
  - Certified Mail®
  - Certified Mail Restricted Delivery
  - Collect on Delivery
  - Collect on Delivery Restricted Delivery
  - Collect on Delivery Restricted Delivery (over \$500)
  - Priority Mail Express®
  - Registered Mail™
  - Registered Mail Restricted Delivery
  - Return Receipt for Merchandise
  - Signature Confirmation™
  - Signature Confirmation Restricted Delivery

Domestic Return Receipt



**IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,  
PENNSYLVANIA**

FRIDAY & COX, LLC,

Plaintiff,

v.

FINDLAW; REUTERS HOLDINGS, INC.;  
and WEST PUBLISHING CORPORATION  
t/d/b/a FINDLAW,

Defendants.

) CIVIL DIVISION

)

) No: GD18-2983

)

)

) Code:

)

)

)

) **NOTICE OF FILING OF PETITION FOR**

)

)

)

) FILED ON BEHALF OF:

) **Defendants, Findlaw, Reuters Holdings,**

) **Inc. and West Publishing Corporation**

)

)

) COUNSEL OF RECORD FOR THIS

) PARTY:

)

) **Danielle M. Vugrinovich, Esquire**

) PA ID #88326

)

) **MARSHALL DENNEHEY**

) **WARNER COLEMAN & GOGGIN**

) Union Trust Building, Suite 700

) 501 Grant Street

) Pittsburgh, PA 15219

) (412) 803-1185

**IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,  
PENNSYLVANIA**

FRIDAY & COX, LLC,	)	CIVIL DIVISION
	)	
	)	No: GD18-2983
	)	
v.	)	
	)	Code:
FINDLAW; REUTERS HOLDINGS, INC.;	)	
and WEST PUBLISHING CORPORATION	)	
t/d/b/a FINDLAW,	)	
	)	
Defendants.	)	

**NOTICE OF FILING OF PETITION FOR REMOVAL OF A CIVIL ACTION**

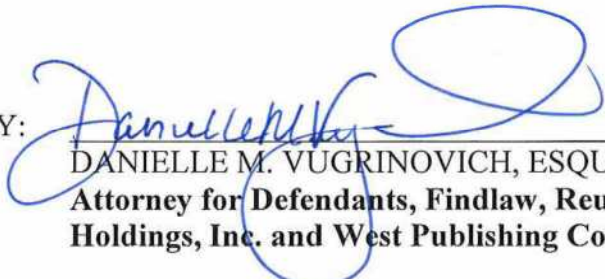
PLEASE TAKE NOTICE that a Petition for Removal of this action was filed in the United States District Court for the Western District of Pennsylvania, on April 25, 2018.

A copy of the said Petition for Removal is attached to this notice and is served and filed herewith.

PLEASE TAKE FURTHER NOTICE that pursuant to 28 U.S.C. §1446(d), the filing of said Petition for Removal in the United States District Court together with the filing of a copy of said notice with this Court, effects the removal of this action and the above-captioned Court may proceed no further unless and until the case is remanded.

Respectfully submitted,

**MARSHALL DENNEHEY  
WARNER COLEMAN & GOGGIN**

BY: 

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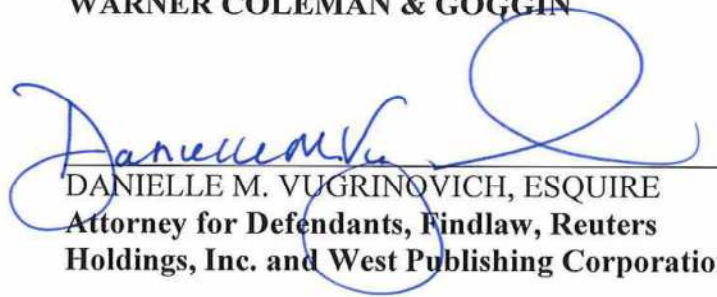
DANIELLE M. VUGRINOVICH, ESQUIRE  
Attorney for Defendants, Findlaw, Reuters  
Holdings, Inc. and West Publishing Corporation

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing **Notice of Filing of Petition for Removal of Civil Action** has been served upon the following known counsel of record this 25<sup>th</sup> day of April, 2018, via electronic mail and/or US First-Class Mail, postage prepaid:

Ian Watt, Esquire  
Peter D. Friday, Esquire  
Friday & Cox, LLC  
1405 McFarland Road  
Pittsburgh, PA 15216  
[iwatt@fridaylaw.com](mailto:iwatt@fridaylaw.com)  
[pfriday@fridaylaw.com](mailto:pfriday@fridaylaw.com)  
**(Counsel for Plaintiff)**

**MARSHALL DENNEHEY  
WARNER COLEMAN & GOGGIN**

  
DANIELLE M. VUGRINOVICH, ESQUIRE  
**Attorney for Defendants, Findlaw, Reuters  
Holdings, Inc. and West Publishing Corporation**