

Rudolph Novak (NJ Attorney ID #003582010)
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Pro Se Plaintiff

RUDOLPH NOVAK, : SUPERIOR COURT OF NEW JERSEY
 : LAW DIVISION-CIVIL PART
Plaintiff, : MORRIS COUNTY
 : DOCKET NO. MRS-L-1804-25
V. :
 : Civil Action
JULIA QUINONES :
(A.K.A. :
"Glad-Cheesecake2959" :
and "codeadampodcast"), :
J. DOE #1 : **NOTICE OF MOTION TO AMEND**
("Roald-Dahl"), : **COMPLAINT AND OBTAIN**
J. DOE #2 : **DISCOVERY**
("pinktiger32"), :
J. DOE #4 :
("the_TTI_mom"), :
J. DOE #8 :
("Homeless-Sea-Captain"), :
J. DOE #9 :
("rjm2013"), :
J. DOE #11 ("marsha- :
linehan"), :
J. DOE #12 - #20 :
(other fictitiously- :
designated persons), :
 :
Defendants. :

Please take notice that on July 17, 2026, at 9:00 a.m. or as soon thereafter as
counsel may be heard, the undersigned, Plaintiff, will move before the Honorable

Patricia O'Dowd, J.S.C., at the Morris County Courthouse, Washington and Court Streets, Morristown, New Jersey, for an order granting leave to amend the complaint (in the form appended to the undersigned's certification as Exhibit F) and to obtain discovery necessary to identify and serve Defendants.

In support of this motion, the undersigned will rely on a certification and a letter memorandum. Those documents, a proof of service and a proposed form of order are being submitted to the Court herewith.

Date: June 30, 2026

s/ Rudolph Novak
Plaintiff

DED:	N/A.
<u>R. 4:21A</u> Arbitration:	Not scheduled.
Trial:	Not scheduled.

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V.	:	
	:	Civil Action
JULIA QUINONES	:	
(A.K.A.	:	
“Glad-Cheesecake2959”	:	
and “codeadampodcast”),	:	
J. DOE #1	:	<u>ORDER</u>
("Roald-Dahl"),	:	
J. DOE #2	:	
("pinktiger32"),	:	
J. DOE #4	:	
("the_TTI_mom"),	:	
J. DOE #8	:	
("Homeless-Sea-Captain"),	:	
J. DOE #9	:	
("rjm2013"),	:	
J. DOE #11 ("marsha-	:	
linehan"),	:	
J. DOE #12 - #20	:	
(other fictitiously-	:	
designated persons),	:	
	:	
Defendants.	:	

This matter having been brought before the Court on motion by Rudolph Novak, the pro se Plaintiff; and the Court having reviewed the papers submitted in

support of the motion; and the Court having reviewed any papers submitted in opposition to the motion; and proper cause for granting the motion appearing; it is on this ____ day of July, 2026, ordered as follows:

1. Plaintiff's motion is granted.
2. Plaintiff has leave to amend the complaint in the form appended to the Rudolph Novak certification as Exhibit F.
3. Plaintiff has leave to obtain discovery within the scope outlined in the Request for Discovery appended to the Novak certification as Exhibit G.
4. This Court made findings of fact and conclusions of law in deciding Plaintiff's motion. The findings and conclusions are set forth in an opinion which is ____ in writing ____ verbally set forth on the record.
5. The opinion referenced in paragraph 4 issued on the following date(s): July _____, 2026.

Hon. Patricia O'Dowd, J.S.C.

Plaintiff's motion was:

☐ Opposed

☐ Unopposed

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 Pro Se Plaintiff

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SUPERIOR COURT OF NEW JERSEY
 LAW DIVISION-CIVIL PART
 MORRIS COUNTY
 DOCKET NO. MRS-L-1804-25

**CERTIFICATION OF RUDOLPH
 NOVAK, IN SUPPORT OF MOTION
 TO AMEND COMPLAINT AND
 OBTAIN DISCOVERY** (Motion
 Returnable July 17, 2026)

Rudolph Novak, an attorney at law of the State of New Jersey, certifies the
 following to be true:

1. I am the Plaintiff in this matter. I make this certification in support of my motion to amend my complaint and for leave to obtain discovery concerning the names and addresses of the defendants.

2. This action concerns (among other things) statements posted by unidentified persons on Reddit (and, in at least two instances, on Instagram). The original Complaint was filed on August 7, 2025.

3. Reddit is owned and operated by a company in the County of San Francisco, State of California. No identity subpoena is sought as to Instagram, because the only Instagram speaker, Julia Quinones, is already identified.

4. In November 2025, I retained Kronenberger Rosenfeld, a San Francisco law firm involved in Internet- and social media-related law, for the purpose of subpoenaing the identities and addresses of the posters so they could be formally named in this lawsuit and served with process.

5. The Complaint had been administratively dismissed and was reinstated by Order of this Court entered April 24, 2026.

6. On April 30, 2026, Reddit was subpoenaed. See Exhibit B.

7. On May 4, 2026, Courtney Otto, Esq., an attorney representing Reddit, objected to the subpoena. A copy of Ms. Otto's letter to Kronenberger Rosenfeld is appended hereto as Exhibit C.

8. As the attorneys argued about the subpoenas, on April 4, 2026, I viewed comments directed at me from “Homeless-Sea-Captain” (J. Doe #8), a “Senior Moderator” of r/troubledteens, in a Reddit thread titled “Totally random-ish (super limited edition post).” Those comments included “Rudy - you also hired the cheapest lawyer in San Francisco to do your dirty work” and “You’ll never find her, BTW [cheesecake image referring to Defendant Glad-Cheesecake2959]. If you spend the rest of your remaining days, trying to find out where she is, you will never be successful.” I also viewed a further comment by the same author stating, “Sorry if people are confused. This is specifically between me and Rudolph,” which was deleted before I could capture it. The reference to my “lawyer in San Francisco” is a direct reference to my California subpoena counsel and confirms that the Defendants have actual knowledge of this lawsuit and of the California subpoena. A printout of the surviving comments is appended hereto as Exhibit D.

9. On June 17, 2026, Ethan Jacobs, Esq., filed a motion in California to quash the subpoena (Exhibit E), captioned on behalf of J. Does #1, #3, #4, #8, #10, and #11. J. Does #3 and #10 had previously been voluntarily dismissed from this action and withdrawn from the subpoena on June 16, 2026; the four live petitioners are J. Does #1, #4, #8, and #11. This motion is currently returnable July 27, 2026.

10. The main contention in this motion is that the allegations in the Complaint lack the specificity required for defamation and false-light-invasion-of-privacy claims. See Exhibit E.

LEAVE TO AMEND COMPLAINT

11. I have prepared a proposed First Amended Complaint (Exhibit F), which, as to all of the Defendants, not only provides the specificity but includes printouts of the posts in question (which I certify to be true copies of what I retrieved from Reddit or Instagram). I personally retrieved and preserved each of these posts, and each printout is a true and accurate depiction of the post as it appeared when retrieved.

12. The tortious-interference claim is carried forward as Count 23 of the Proposed First Amended Complaint, and a civil-conspiracy claim is pleaded as Count 24.

13. The amended complaint provides specificity, includes the posts in question, and otherwise addresses the chief objections raised in the Petition to Quash filed on behalf of J. Does #1, #4, #8, and #11 and in Reddit's objection letter.

14. To date, none of the Defendants has answered the complaint. The proposed amendment will not prejudice the Defendants, especially since it

provides the information they claimed should have been provided in the original complaint.

LEAVE FOR DISCOVERY

(1) SPECIFICITY

15. As stated, the proposed amended complaint identifies the Defendants with specificity:

(a) Julia Quinones (“codeadampodcast” on Instagram; “Glad-Cheesecake2959” on Reddit): Counts 1–2 (Instagram; Exhibit A-2, with Exhibit A-1 as evidence of malice) and Counts 3–4 (Reddit; Exhibit A-3).

(b) J. Doe #1 (“Roald-Dahl”): Counts 5–6 (Exhibit A-4); Counts 9–10 (Exhibit A-5); and Counts 17–18 (Exhibit A-9).

(c) J. Doe #2 (“pinktiger32”): Counts 7–8 (Exhibit A-4).

(d) J. Doe #4 (“the_TTI_mom”): Counts 11–12 (Exhibit A-5) and Counts 19–20 (Exhibit A-7).

(e) J. Doe #8 (“Homeless-Sea-Captain”): Counts 15–16 (Exhibit A-8).

(f) J. Doe #9 (“rjm2013”): Counts 21–22 (Exhibit A-10).

(g) J. Doe #11 (“marsha-linehan”): Counts 13–14 (Exhibit A-6).

(2) SERVICE EFFORTS

16. The Defendants have actual knowledge of this litigation. As set forth above (Exhibit D), on April 4, 2026 J. Doe #8/Homeless-Sea-Captain referred to my having “hired the cheapest lawyer in San Francisco” — a direct reference to my California subpoena counsel. In addition, certain Doe defendants, through counsel Ethan Jacobs, Esq., appeared and filed the Petition to Quash now pending in California (Exhibit E; returnable July 27, 2026).

17. I am causing copies of these motion papers to be served by e-mail on Ethan Jacobs, Esq., counsel for J. Does #1, #4, #8, and #11. The anonymous Defendants have already received actual notice of this proceeding. Consistent with Reddit, Inc.’s standard practice of notifying account holders when their accounts are the subject of legal process, the holders of the subpoenaed usernames were notified of the subpoena; four of them — J. Does #1, #4, #8, and #11 — responded by retaining counsel and appearing to file the Petition to Quash, and have acknowledged this litigation in their own public posts (see paragraphs 16 and 18 above and Exhibits D and D-1). Because these Defendants already have actual knowledge of the subpoena and this motion, no separate posting on Reddit is necessary to apprise them. Defendant Quinones is identified but not yet served, and my efforts to serve her continue.

18. The Defendants’ knowledge of the suit has not stopped their conduct. On May 7, 2026, in a Reddit thread reacting to a Ridge RTC press release, J. Doe

#8/Homeless-Sea-Captain published further statements directed at me, including “no one gives two shits what The Ridge ... has to say anyway,” “laughing at you and every other asinine TTI fool behind you,” and “Have a terrific weekend and, seriously — Fuck off, Rudy.” In the same thread the author added, “if Rudy doesn’t get the message by now ... my vote is that I advance to the next level and take Rudy on for a fierce public battle,” and stated, “I’m not sure if I plan on leaving this post up” — confirming both the Defendants’ awareness of this lawsuit and an intent to delete content. A printout is appended hereto as Exhibit D-1, and I preserved these materials before deletion.

(3) CASE FOR DEFAMATION, FALSE LIGHT INVASION OF PRIVACY AND TORTIOUS INTERFERENCE ESTABLISHED

19. Proposed Amended Complaint Exhibit A-2 is a true and accurate copy of an August 9, 2024 Instagram post by Julia Quinones (“codeadampodcast”) that displayed my name, photograph, professional role, and employment history, tagged @rudynovakofficial and @ridgertc, and added the hashtags “#abuse,” “#neglect,” and “#allegations”. Beneath the reference to my 2015–2023 employment as Director of Outreach at Turnbridge, the post placed the following statements attributed to others:

There are so many HIPPA [sic] violations going on in that place it’s frightening! [the_TTI_mom] I think a better question is “who else was sexually assaulted at Turnbridge??” [pinktiger32]

(a) The statement is false: no client, patient, family member of a client, employer, colleague, regulator, or licensing authority has ever made or sustained any allegation that I abused or neglected a client or patient or violated patient privacy. I have never been involved with or aware of any HIPAA violation or sexual assault at Turnbridge or any other program; I have never been accused by any regulator, employer, or licensing authority of any HIPAA violation; and I have never been accused, investigated, or charged with any sexual assault, or with allowing any sexual assault to occur, at Turnbridge or any program with which I have worked. (b) It was published to third persons on Instagram, where any member of the public could read it. (c) It conveys the false message that I do not protect clients' privacy or physical safety at the facilities where I work. (d) One month earlier, on July 9, 2024, Ms. Quinones sent me the message appended as Exhibit A-1, disclaiming any intention to create controversy and wishing me well, which shows she had no basis to associate me with abuse; she published the accusation anyway.

20. Proposed Amended Complaint Exhibit A-3 is a true and accurate copy of an August 9–10, 2024 Reddit post by Julia Quinones (“Glad-Cheesecake2959”) titled “Introducing Rudy Novak”. It states, in relevant part:

Rudy, If you're reading this, I want to bring to your attention the serious issue of abuse that survivors have faced . . . How will Altior Healthcare ensure that abuse and neglect are prevented in the

future? [T]he reality is that children are being abused, ignored, and censored.

(a) The statement is false: no abuse or neglect has been committed by me, and the post attributes the underlying allegations to others and to a period before my employment. (b) It was published to third persons on Reddit, where any member of the public could read it. (c) It conveys the false message that abuse and neglect were presently occurring at a facility for which I was employed. (d) This was published one month after Ms. Quinones's July 9, 2024 message (Exhibit A-1), in which she acknowledged she did not know me.

21. Proposed Amended Complaint Exhibit A-4 is a true and accurate copy of an August 11, 2024 Reddit post by J. Doe #2 ("pinktiger32"). It states, in relevant part:

As an attorney who attended a t25 school . . . I can tell you that [Plaintiff's law school] **Rutgers-Camden is a 4th tier law school. Touro University** [Plaintiff's graduate program] **isn't even accredited.** Looks like Rudy likes spending daddy's money at these bottom feeder schools that **print diplomas.**

(a) The statement is false: Rutgers is not a fourth-tier school, Touro is accredited, and I earned my degrees rather than purchasing them. (b) It was published to third persons on Reddit, where any member of the public could read it. (c) It conveys the false message that my educational credentials are fraudulent. (d) The author, an anonymous stranger with no knowledge of me,

asserted specific, publicly verifiable, and false facts about my degrees with no source or basis.

22. Proposed Amended Complaint Exhibit A-5 is a true and accurate copy of a December 10, 2024 Reddit post by J. Doe #1 (“Roald-Dahl”). It states, in relevant part:

!!RUNAWAY AT TURNBRIDGE!! (Killingworth, CT campus) — Silver Alert has been cancelled for missing 14-yr. old girl (who probably fled bc **she was sick and tired of drinking [hot dog image, symbolizing Plaintiff] Rudy Novak’s [hot dog image] hot dog water).**

(a) The statement is false: I left Turnbridge in July 2023, more than a year before the December 2024 incident; I had no role in it and abused no one. I had no role in the operations or admissions of Turnbridge at the time of that incident, and no authority has ever attributed that runaway to any abuse or wrongdoing by me. (b) It was published to third persons on Reddit, where any member of the public could read it. (c) It conveys the false message that while I was working at Turnbridge, a 14-year-old girl ran away because I was sexually abusing her. (d) The author had posted on Exhibit A-3 and there recited my work history (“Director of Outreach, Turnbridge, Nov 2015 – Jul 2023”), and thus knew I had not been at Turnbridge for more than a year when this was published.

23. Proposed Amended Complaint Exhibit A-5 is a true and accurate copy of a December 10, 2024 Reddit post by J. Doe #4 (“the_TTI_mom”). It states, in relevant part:

Rudy Novak can choke on his own hotdog [hot dog image] every SINGLE parent I’ve spoken to who had experience with Turnbridge was **lied to, manipulated and abused**. I can’t tell you the number of **HIPAA violations** I saw there. PARENTS, DO NOT SEND YOUR KIDS TO THAT HELLHOLE!!!!

(a) The statement is false: I committed no HIPAA violation, and I did not lie to, manipulate, or abuse any parent. I have never been accused by any regulator, employer, or licensing authority of any HIPAA violation. (b) It was published to third persons on Reddit, where any member of the public could read it. (c) It conveys the false message that I lie to, manipulate, and abuse parents of Turnbridge clients and allow HIPAA violations at the facility. (d) The author claimed firsthand knowledge (“the number of HIPAA violations I saw there”) that the author did not have.

24. Proposed Amended Complaint Exhibit A-6 is a true and accurate copy of a January 11, 2025 Reddit post by J. Doe #11 (“marsha-linehan”). It states, in relevant part:

If I’m wrong, I’m wrong, but it’s better to warn people about Rudy Novak and be wrong than not to have warned people at all considering the mass destruction of human beings and the level of human trafficking. He has been engaged with for decades now despite being very young.

(a) The statement is false: I have never engaged in human trafficking or the destruction of human beings. I have never been investigated, charged, or convicted of human trafficking, and no court or professional body has ever characterized or suggested that my work involves human trafficking. (b) It was published to third persons on Reddit, where any member of the public could read it. (c) It conveys the false message that for decades, I have been engaged in human trafficking. (d) The author admitted reckless disregard for the truth: “If I’m wrong, I’m wrong, but it’s better to warn people about Rudy Novak and be wrong”

25. Proposed Amended Complaint Exhibit A-8 is a true and accurate copy of a Reddit post by J. Doe #8 (“Homeless-Sea-Captain”), headed “Rudy Novak announces his new TTI Bird Sanctuary Clinical Partnership [bird image] [bird image] [laughing face image] on the shuttered Ironwood Maine campus”. It states, in relevant part:

Seriously, though. I wonder if interventionist Rudolph — also associated with Turnbridge, Paradigm, and several other programs — ever feels guilty about the Ironwood parent (a mother) who died by suicide because of the Horton family. **He and Ironwood then tried to cover it up** by abruptly closing the program just a week after she had launched a “Close Ironwood” petition. That’s the real reason Ironwood shut down, by the way. **They treated her so terribly and bullied her so much that it drove her to take her own life.**

(a) The statement is false: I do not know who the “Horton family” referenced in the post is; to my knowledge I have never met, communicated with, or had any dealing or relationship with them. I bullied no one, I have no knowledge of any such suicide, and I had nothing to do with any cover-up. No court, regulator, or law-enforcement agency has ever found that I or Ironwood bullied any parent, caused any parent’s death, or closed any program to cover up a death. I was hired by Altior Healthcare on July 24, 2023 as Vice President of Clinical Partnerships, an offsite role. Altior had acquired the Ironwood program before my employment. The program was not shut down; it continued to operate and, in or about June 2024, was restructured and rebranded as Ridge RTC, with changes to its operational structure, business model, and client population. I have no involvement in or responsibility for the operations, licensing, or clinical care of Ironwood, Ridge RTC, or any affiliated facility, and I have no knowledge of the events described. (b) It was published to third persons on Reddit, where any member of the public could read it. (c) It conveys the false message that I bullied the parent of a client, that my bullying drove her to suicide, and that I assisted in covering it up. (d) The author published this with no basis and continued to target me after this lawsuit was filed (Exhibit D).

26. Proposed Amended Complaint Exhibit A-9 is a true and accurate copy of a December 24, 2024 Reddit comment by J. Doe #1 (“Roald-Dahl”), in a thread by J. Doe #11 (“marsha-linehan”). It states, in relevant part:

Rudy has LITERALLY outed his entire awful global human trafficking playbook.

(a) The statement is false: I have never been involved in human trafficking. I have never been investigated, charged, or convicted of human trafficking or kidnapping, and no court or professional body has ever characterized my work as involving human trafficking or the arranging of kidnappings. Roald-Dahl’s reference to a “global human trafficking playbook” is pure invention. (b) It was published to third persons on Reddit, where any member of the public could read it. (c) It conveys the false message that I am involved in human trafficking. (d) Human trafficking is a federal criminal offense, and the imputation of it is defamatory per se; the author published it as part of a coordinated campaign against me.

27. Proposed Amended Complaint Exhibit A-7 is a true and accurate copy of a March 1, 2025 Reddit post by J. Doe #4 (“the_TTI_mom”). In response to a post asking, “Is this HOT DOG RUDY NOVAK by chance? . . . I would not bite people,” the author posted:

If it's HOT DOG Rudy, he wont give his number although I'd love to have a chat with the scum bag and tell him what I think of **his profession in child abuse**.

(a) The statement is false: I have never committed child abuse. (b) It was published to third persons on Reddit, where any member of the public could read it. (c) It conveys the false message that I have committed child abuse in connection with the facilities where I have worked. (d) The statement was published with evident ill will ("the scum bag") in a thread directed at me.

28. Proposed Amended Complaint Exhibit A-10 is a true and accurate copy of an October 16, 2025 Reddit post by J. Doe #9 ("rjm2013"). In response to a post asking, "Can someone shed some insight as to why this specific person is hated in the community?" the author, posting as the subreddit's "Chief Administrator," published:

So what is "wrong" with Rudy? It is simple: he gets it absolutely wrong. The TTI **kidnapping kids** a[nd] holding them against their will for profit? It's never going to be acceptable. Not ever.

(a) The statement is false: I have never kidnapped anyone. (b) It was published to third persons on Reddit, where any member of the public could read it. (c) It conveys the false message that I kidnap children. (d) Kidnapping is a criminal offense, and the imputation of it is defamatory per se; the author answered a question about why I specifically am "hated."

29. Each of the statements identified in paragraphs 19-28 was made with knowledge of falsity or in reckless disregard as to falsity. Other than a single unsolicited Instagram direct message Defendant Quinones sent me on July 9, 2024 (Exhibit A-1), which I did not answer, I have never met, spoken with, corresponded with, or had any relationship, dealing, or interaction of any kind with any of the Defendants. No Defendant has ever had any personal knowledge of Plaintiff, his conduct, his employment, or the facts each Defendant purported to assert about him. They published as anonymous strangers, with no source of information, no investigation, and no factual basis for the specific accusations made — including accusations of human trafficking, kidnapping, child abuse, sexual misconduct, HIPAA violations, and causing a death.

30. The falsity was further apparent from each Defendant's own words and conduct, and from the coordinated, repeated, and republished nature of the campaign described above. By way of example:

(a) Defendant marsha-linehan expressly acknowledges in her post that “If I’m wrong, I’m wrong, but it’s better to warn people about Rudy Novak and be wrong...” while simultaneously accusing me of “mass destruction of human beings” and “human trafficking” over “decades.” Publishing criminal accusations while admitting the possibility of falsity reflects reckless disregard for truth.

(b) Defendant Roald-Dahl previously posted my Turnbridge employment dates and knew I had left Turnbridge more than a year before the December 2024 runaway incident. Nevertheless, Roald-Dahl used that incident to portray Turnbridge as “fraudulent,” “HORRIBLY ABUSIVE,” and as having “tried to cover this up,” and urged parents to “DO believe Reddit” instead of any contrary information. This deliberate use of an unrelated event to advance a narrative of abuse and cover-up shows reckless disregard.

(c) Defendant Homeless-Sea-Captain narrates a specific story that I and Ironwood “bullied” a mother so badly it “drove her to take her own life” and “tried to cover it up” by closing the program, without any personal connection to me and without citing any source supporting that causation. The specificity of the narrative, combined with the lack of factual basis, supports an inference of fabrication and reckless disregard.

(d) Defendant the_TTI_mom describes “so many HIPPA violations” and claims “every SINGLE parent” she spoke to was lied to, manipulated, and abused, yet provides no dates, names, or incidents and speaks from an anonymous Reddit account, not from documented experience with my conduct. The sweeping nature of these accusations, tied directly to me by name, supports an inference of reckless disregard.

31. My tortious interference claim is meritorious. I have worked in the behavioral and mental-health treatment field since June 2013, and have been assisting clients and families in finding all levels of behavioral and mental health care since 2002. The Defendants intentionally and without justification interfered with that economic expectation, expressly seeking to have me “blacklisted.” As a result, I have lost or been denied referrals, at least three colleagues or referral sources have distanced themselves from me, and specific professional opportunities have been withheld.

(4) REQUEST FOR DISCOVERY

32. Appended hereto as Exhibit G is a copy of my Request for Discovery, which seeks from Reddit, Inc. only the information needed to identify and locate the holders of the usernames Roald-Dahl, pinktiger32, the_TTI_mom, Homeless-Sea-Captain, rjm2013, and marsha-linehan — names, e-mail and mailing addresses, telephone numbers, registration and login IP information, account-creation dates, and identity-bearing billing records, and not the content of any communication.

33. My reasons justifying the specific discovery requested, the identification of a limited number of persons or entities on whom process might be served, and the reasonable likelihood that the discovery will lead to identifying information making service of process possible, are as follows:

Reddit, Inc. is the single entity that maintains the registration and account records sought, and the limited identity-and-location discovery requested is reasonably likely to lead to information sufficient to permit service of process.

34. I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Date: June 30, 2026

s/ Rudolph Novak

Attorney at Law, State of NJ

Rudolph Novak (#003582010)
5 Ridgewood Drive
Randolph, NJ 07869
Phone: 856-906-2980
E-Mail: rudy@rvnlaw.com
Pro Se Plaintiff

June 30, 2026

Hon. Patricia O'Dowd, J.S.C.
Morris County Courthouse
Washington and Court Streets
Morristown, NJ 07960-0910

Re: RUDOLPH NOVAK V.
JULIA QUINONES (A.K.A. "Glad-Cheesecake" and
"codeadampodcast") et al.
DOCKET NO. MRS-L-1804-25
PROPOSED RETURN DATE: JULY 17, 2026

Dear Judge O'Dowd:

Please accept this letter memorandum in support of Plaintiff's motion to amend the complaint and obtain discovery regarding the identities and addresses of the Defendants J. Doe #1 ("Roald-Dahl"), J. Doe #2 ("pinktiger32"), J. Doe #4 ("the_TTI_mom"), J. Doe #8 ("Homeless-Sea-Captain"), J. Doe #9 ("rjm2013") and J. Doe #11 ("marsha-linehan"),

BACKGROUND

Plaintiff Rudolph Novak is a professional in the behavioral and mental-health treatment field. Beginning in 2024, the Defendants — the named defendant Julia Quinones and a group of anonymous Reddit users — published a

coordinated series of statements about Mr. Novak on Reddit (in the r/troubledteens community) and on Instagram, accusing him of, among other things, abuse and neglect of clients, HIPAA violations, sexual abuse of a minor, human trafficking, kidnapping, driving a parent to suicide and covering it up, and holding fraudulent academic credentials.

Mr. Novak filed his Complaint on August 7, 2025. Because the Defendants posted anonymously, he retained California counsel (Kronenberger Rosenfeld) in November 2025 to obtain the posters' identifying information from Reddit, Inc. (located in San Francisco). After the Complaint was reinstated by Order of this Court entered April 24, 2026, the operative subpoena was domesticated and served on Reddit on April 30, 2026 (Novak Certification, Exhibit B), and Reddit objected by letter dated May 4, 2026 (*id.*, Exhibit C).

Certain Doe defendants, through counsel Ethan Jacobs, Esq., have petitioned to quash the subpoena in California, with a hearing set for July 27, 2026; their central contention is that the Complaint lacks the specificity required for defamation and false-light claims because it does not quote or attach the actual posts.

The Proposed First Amended Complaint quotes each actionable statement verbatim, identifies the platform, subreddit, and date of each, and appends a printout of each post as an exhibit. It thereby supplies the specificity the

Petitioners say is missing, and it satisfies the standard for obtaining discovery of the Defendants' identities.

DISCUSSION

I. IN THE INTEREST OF JUSTICE, THE COURT SHOULD GRANT LEAVE TO AMEND THE COMPLAINT.

"Where justice requires it, pleadings may be amended or supplemented." Kent v. Borough of Mendham, 111 N.J. Super. 67, 79 (App. Div. 1970). "Under Rule 4:9-1, motions for leave to amend a complaint must 'be granted liberally,' but the decision is left to the trial 'court's sound discretion.'" C.V. by & through C.V. v. Waterford Twp. Bd. of Educ., 255 N.J. 289, 306 (2023) (quoting Kernan v. One Wash. Park Urb. Renewal Assocs., 154 N.J. 437, 456-57 (1998)). "In exercising its discretion whether to grant leave to amend, the court is guided by the fact that leave is 'liberally granted and without consideration of the ultimate merits of the amendment.'" Sadeeshkumar v. Venugopal, 478 N.J. Super. 25, 33 (App. Div. 2024) (quoting Pressler & Verniero, Current N.J. Court Rules, cmt. 2.1 on R. 4:9-1 (2024)). "[T]he court's 'exercise of discretion requires a two-step process: whether the non-moving party will be prejudiced, and whether granting the amendment would ... be futile.'" C.V., 255 N.J. at 306 (quoting Notte v. Merchs. Mut. Ins. Co., 185 N.J. 490, 501 (2006)).

The Defendants will not be prejudiced. Defendants did not answer the original complaint because Plaintiff has been unable to identify and serve them

with process. Several Defendants have moved to quash a California subpoena for their identities, arguing that the complaint herein requires specificity. The proposed amended complaint provides that specificity, as a result of which the motion to quash will be denied, the Defendants will be identified and served, and this litigation will move forward.

The amendment is anything but futile. As explained in Sub-Point IIC, Plaintiff has alleged meritorious claims under defamation, false light and tortious interference theories. Plaintiff has added a civil conspiracy claim (see Proposed First Amended Complaint, Twenty-Fourth Count). The amended counts arise from the same posts and the same coordinated campaign pleaded in the original Complaint, which was timely filed on August 7, 2025 against defendants there sued under fictitious names; they therefore relate back to the original pleading under R. 4:9-3 and R. 4:26-4 and are not time-barred.

II. THE COURT SHOULD GRANT LEAVE TO CONDUCT DISCOVERY CONCERNING THE NAMES AND ADDRESSES OF THE DEFENDANTS.

"[A] click of the mouse may . . . instantaneously send defamatory messages to a wide audience, causing great harm to the reputation of others. To the extent these speakers choose to remain hidden behind their computers, difficulties are posed for injured individuals who seek redress." Warren Hosp. v. Does 1-10, 430 N.J. Super. 225, 229-30 (App. Div. 2013). The Appellate

Division "adopted a four-part test for determining whether and to what extent a plaintiff may obtain discovery designed to ascertain the identity of persons posting messages on an ISP message board." Id. at 231 (citing Dendrite Int'l, Inc. v. Doe No. 3, 342 N.J. Super. 134, 140 (App. Div. 2001)).

[A] plaintiff, who claims an injury based on an anonymous or pseudonymous statement on an ISP message board, must: (1) identify the fictitious defendant with "sufficient specificity" to allow for a determination as to whether the defendant "is a real person or entity" who may be sued; (2) demonstrate a "good-faith effort to comply with the requirements of service of process"; (3) present sufficient facts from which it may be concluded that the suit can withstand a motion to dismiss; and (4) provide "a request for discovery with the [c]ourt, along with a statement of reasons justifying the specific discovery requested as well as identification of a limited number of persons or entities on whom discovery process might be served and for which there is a reasonable likelihood that the discovery process will lead to identifying information about defendant that would make service of process possible."

Ibid. (quoting Dendrite, 342 N.J. Super. at 151–52).

A. SPECIFICITY.

Each of the defendants is identified via the user name(s) they use on the social platform(s) where the defamatory/false-light statements are made. The amended complaint quotes the defamatory statements and includes screenshots of the posts as exhibits. The defendants have been identified with sufficient specificity.

B. SERVICE/NOTIFICATION EFFORTS.

As for "attempting to notify the anonymous poster," Juzwiak v. Doe, 415 N.J. Super. 442, 449 (App. Div. 2010) (citing Dendrite, 342 N.J. Super. at 141), Plaintiff's good-faith service efforts have alerted the Defendants to the lawsuit. Through counsel Ethan Jacobs, Esq., certain Doe defendants (J. Does #1, #4, #8, and #11) have appeared in California and are moving to quash the subpoena — their appearance is conclusive proof of notice. Plaintiff is also causing these motion papers to be served by e-mail on Mr. Jacobs. The Defendants' own conduct confirms their awareness of this lawsuit: on April 4, 2026, while the subpoena was pending, J. Doe #8 (Homeless-Sea-Captain) referred on Reddit to Plaintiff having "hired the cheapest lawyer in San Francisco" — a direct reference to Plaintiff's California subpoena counsel (see Novak Certification, Exhibit D). These Defendants received that notice through Reddit's own standard practice of notifying account holders when their accounts are subpoenaed, and their prompt retention of counsel and appearance to quash confirm the notice was effective. Where, as here, the anonymous defendants have actual notice and have appeared through counsel, a separate posting on the subreddit is unnecessary to satisfy the notification concern identified in Dendrite and Juzwiak.

C. PRIMA FACIE CASE ALLEGED AND ESTABLISHED.

"[T]he plaintiff 'must produce sufficient evidence supporting each element of its cause of action, on a prima facie basis ...' before a court may order disclosure of the poster's identity." Juzwiak, 415 N.J. Super. at 449 (quoting Immunomedics, Inc. v. Doe, 342 N.J. Super. 160, 166 (App. Div. 2001) (citation omitted)).

1. DEFAMATION.

"Our law of defamation is grounded on the principle that people should be free to enjoy their reputations unimpaired by false and defamatory attacks." Bank v. Lee, 481 N.J. Super. 412, 430 (App. Div. 2025) (Fees v. Trow, 105 N.J. 330, 336 (1987)) (internal quotation marks and citation omitted). "'A defamatory statement, generally, is one that subjects an individual to contempt or ridicule, one that harms a person's reputation by lowering the community's estimation of him or by deterring others from wanting to associate or deal with him.'" Ibid. (quoting Petro-Lubricant Testing Labs., Inc. v. Adelman, 233 N.J. 236, 253 (2018)) (citation omitted). "To recover for harm caused by such a statement, plaintiffs must demonstrate three elements: (1) the defendant 'made a false and defamatory statement;' (2) 'the statement was communicated to another person (and not privileged);' and (3) the defendant acted with fault by either a negligence or actual malice standard." Id. at 430-31 (quoting G.D. v. Kenny, 205 N.J. 275, 292-93 (2011)).

(i) Making of False and Defamatory Statements: Counts 1, 3, 5, 7, 9, 11, 13, 15, 17, 19, and 21 each contain statements made by specified Defendants. Each specifies how the statement was published (on Reddit, except in one instance on Instagram). Each statement is quoted directly, with a printout of the post included as an exhibit to the amended pleading. Mr. Novak has authenticated each exhibit and certified that each is false. See his certification at ¶¶ 19-28.

"A defamatory statement, generally, is one that subjects an individual to contempt or ridicule, one that harms a person's reputation by lowering the community's estimation of him or by deterring others from wanting to associate or deal with him." Wunsch v. CTE Republicans for Englewood Cliffs, 483 N.J. Super. 231, 252 (App. Div.) (quoting Petro-Lubricant, 233 N.J. at 253), certifs. granted, 264 N.J. 156, 158 (2026)

"The threshold issue" of whether a statement has a defamatory meaning is a matter of law "to be decided by the court." Molin v. Trentonian, 297 N.J. Super. 153, 156 (App. Div. 1997). Courts ordinarily use a context- and content-dependent test regarding the statement's "fair and natural meaning" as understood "by reasonable persons of ordinary intelligence." G.D., 205 N.J. at 293 (quoting Romaine v. Kallinger, 109 N.J. 282, 290 (1988)). Some statements, however, are so injurious they are "defamatory as a matter of law." Romaine, 109 N.J. at 291. These include statements "falsely attributing criminality to an individual." G.D., 205 N.J. at 293 (citing Romaine, 109 N.J. at 291); see, e.g., Lawrence v. Bauer Publ'g & Printing, 89 N.J. 451, 456, 459-60 (1982) (statement that "forgery charges may loom" was "little different from an assertion that plaintiffs have actually been charged"); see also Food Lion, Inc.

v. Melton, 250 Va. 144, 458 S.E.2d 580, 584 (1995) ("A statement imputes the commission of a crime when it refers to matters that would naturally and presumably be understood by those hearing them as charging a crime.").

Bank, 481 N.J. Super. at 431.

"A statement made in the context of and pertaining to a person's trade, profession or business . . . is actionable if the statement is made with reference to "a matter of significance and importance" relating to the manner in which the subject of the statement carries out his trade, profession or business." Lutz v. Royal Ins. Co. of Am., 245 N.J. Super. 480, 492–93 (App. Div. 1991).

"To determine if a statement has a defamatory meaning, a court must consider three factors: '(1) the content, (2) the verifiability, and (3) the context of the challenged statement.'" Leang v. Jersey City Bd. of Educ., 198 N.J. 557, 585 (2009) (quoting DeAngelis v. Hill, 180 N.J. 1, 13 (2004)).

The defamation counts directly quote the Defendants' social media posts (which are appended to the amended complaint as exhibits). They falsely state in no uncertain terms that Plaintiff has committed serious crimes and professional misconduct in connection with treatment facilities, including human trafficking, kidnapping, bullying a parent into suicide, HIPAA violations, sexual abuse, and covering up incidents. The statements in question are not opinions but are factual and can be either verified or disproven. The context is also significant. People searching social media who are either seeking

treatment or deciding whether to refer treatment to a facility are being urged by Defendants to avoid Plaintiff because they 'know' he is guilty of the acts/omissions.

(ii) Non-Privileged Communications: "The second element of the defamation standard requires proof that the defendant published a communication not subject to any privilege, a term that denotes in defamation law 'the fact that conduct which, under ordinary circumstances, would subject the actor to liability, under particular circumstances does not subject him to such liability.'" Hyman v. Rosenbaum Yeshiva of N. Jersey, 258 N.J. 208, 237 (Patterson, J., concurring) (quoting Restatement (Second) of Torts § 10(1) (1965)), reconsideration denied, 258 N.J. 392 (2024). "In 'narrowly defined instances,' where the public interest in unrestrained communication outweighs the reputation interests of individuals, a privilege will work to defeat the right of redress." Orso v. Goldberg, 284 N.J. Super. 446, 451 (App. Div. 1995) (quoting Fees v. Trow, 105 N.J. 330, 336 (1987)). "Absolute privileges completely immunize statements 'made in judicial, legislative, or administrative proceedings.'" Senna v. Florimont, 196 N.J. 469, 481 n.7 (2008) (quoting Dairy Stores, Inc. v. Sentinel Publ'g Co., 104 N.J. 125, 136 (1986)). "Qualified privileges provide protection for speech so long as the speaker does not abuse the privilege, such as by speaking 'with an improper purpose or ill will.'"

Ibid. (quoting Dairy Stores, 104 N.J. at 136). "Examples of qualified privileges are when people 'make statements to authorities for the prevention and detection of crime,' and when the press reports on statements made at government meetings." Ibid. (quoting Dairy Stores, 104 N.J. at 136-37).

A conditional or qualified privilege is limited as the title suggests. If the privilege is abused, it will no longer protect the publisher against a claim of defamation. Abuse occurs if

(1) the publisher knows the statement is false or the publisher acts in reckless disregard of its truth or falsity; (2) the publication serves a purpose contrary to the interests of the qualified privilege; or (3) the statement is excessively published.

Gulrajaney v. Petricha, 381 N.J. Super. 241, 258–59 (App. Div. 2005) (quoting Govito v. W. Jersey Health Sys. Inc., 332 N.J. Super. 293, 312 (App. Div.2000)) (citation omitted).

Knowingly publishing false statements about Plaintiff (or publishing with reckless disregard as to falsity), via Reddit or Instagram, to the social media public, is not privileged.

(iii) Fault: "In New Jersey, proof of fault—negligence or actual malice—is now always required in a defamation case." Senna, 196 N.J. at 491 n.16. "Private persons need only demonstrate the defamatory statement was made negligently." Hill v. Evening News Co., 314 N.J. Super. 545, 554 (App. Div. 1998). "In a case involving the negligence standard, proof of fault must be established only by a preponderance of the evidence." Senna, 196 N.J. at 491

n.16. "There must be a showing of actual malice by a defendant where the statement is about a plaintiff who is a public figure or relates to an issue of public concern." Herman v. Muhammad, 480 N.J. Super. 480, 492 (App. Div. 2024) (citing Senna, 196 N.J. at 495-496). "In a case involving the actual-malice standard, the plaintiff is required to establish fault by clear and convincing evidence." Senna, 196 N.J. at 491 n.16.

Plaintiff respectfully submits that the governing standard is negligence, because he is a private figure and the statements concern him personally rather than a legitimate matter of public concern; a private-figure plaintiff "need only demonstrate the defamatory statement was made negligently," by a preponderance of the evidence. Hill v. Evening News Co., 314 N.J. Super. 545, 554 (App. Div. 1998). The Defendants — anonymous strangers asserting specific, verifiable, and false facts about Plaintiff with no source or basis — plainly acted at least negligently.

Even under the actual-malice standard — should the Court treat any statement as one of public concern — Plaintiff makes the required showing for the strongest counts. The record shows: (a) the Defendants published Plaintiff's accurate employment history ("Director of Outreach, Turnbridge, Nov 2015–Jul 2023") and therefore knew he had left Turnbridge eighteen months before the December 2024 incident they blamed on him; (b) Ms. Quinones wrote to

Plaintiff a month before her post, disclaiming any intent to create controversy and acknowledging no basis to associate him with abuse, then accused him anyway; and (c) Defendant marsha-linehan admitted it was “better to... be wrong” than not to warn; and (d) the Defendants have continued to publish about Plaintiff even after this suit was filed — in a May 7, 2026 Reddit thread (Novak Certification, Exhibit D-1), J. Doe #8 vowed to “take Rudy on for a fierce public battle” and told Plaintiff to “Fuck off,” reflecting continued ill will and a reckless disregard for the truth. As to the remaining Defendants, the inquiry turns on state of mind, for which there is “an especially strong need for full discovery.” Wunsch v. CTE Republicans for Englewood Cliffs, 483 N.J. Super. 231, 250 (App. Div. 2025). Plaintiff therefore satisfies the fault element under either standard.

2. FALSE LIGHT INVASION OF PRIVACY.

In Counts 2, 4, 6, 8, 10, 12, 14, 16, 18, 20, and 22, Plaintiff alleges that Defendants invaded his privacy by casting him in a false light. “A false light tort occurs when a defendant publicizes a matter that “unreasonably places [an individual] in a false light before the public.” Chipola v. Flannery, 261 N.J. 460, 470-71 (2025) (quoting Romaine v. Kallinger, 109 N.J. at 293). “To succeed on a false light claim, a plaintiff must prove that: (1) ‘the false light in which the [plaintiff] was placed would be highly offensive to a reasonable

person,' and (2) the defendant 'had knowledge of or acted in reckless disregard as to the falsity of the publicized matter and the false light in which the [plaintiff] would be placed.'" Ibid. (quoting Romaine, 109 N.J. at 294).

"To satisfy the first element, 'the material publicized 'must be something that would be objectionable to the ordinary person under the circumstances.'" Ibid. (quoting Romaine, 109 N.J. at 295). No ordinary person would fail to object to accusations of child abuse and neglect, particularly when one's business involves the treatment of clients under the age of 18.

"Under the second element, 'a fundamental requirement of the false light tort is that the disputed publicity be in fact false, or else at least have the capacity to give rise to a false public impression as to the plaintiff.'" Ibid. (quoting Romaine, 109 N.J. at 294). The statements are false, as Plaintiff certifies at ¶¶ 19-28. J. Doe #1/Roald-Dahl's claim that Plaintiff sexually abused a girl at Turnbridge, causing her to run away – when Plaintiff's association with Turnbridge ended more than a year earlier – is demonstrably false. Defendants' knowledge of or reckless disregard as to falsity is discussed in the previous section on defamation.

3. TORTIOUS INTERFERENCE.

A claim for tortious interference with a contract and/or prospective business relationship requires a plaintiff to prove:

(1) [she] had some reasonable expectation of economic advantage; (2) the defendants' actions were malicious in the sense that the harm was inflicted intentionally and without justification or excuse; (3) the interference caused the loss of the prospective gain or there was a reasonable probability that the plaintiff would have obtained the anticipated economic benefit, and (4) the injury caused the plaintiff damage.

Singer v. Beach Trading Co., 379 N.J. Super. 63, 81, 876 A.2d 885, 895 (App. Div. 2005) (quoting Mandel v. UBS/PaineWebber, Inc., 373 N.J. Super. 55, 79-80 (App. Div. 2004), certifs. denied, 183 N.J. 213, 214 (2005)).

In the present case, Plaintiff has worked in the behavioral and mental-health treatment field since June 2013, and has been assisting clients and families in finding all levels of behavioral and mental health care since 2002. See ¶ 31 of the certification. He has a reasonable expectation of continuing in that field to his economic advantage.

"Interference with a contract is intentional 'if the actor desires to bring it about or if he knows that the interference is certain or substantially certain to occur as a result of his action.'" Dello Russo v. Nagel, 358 N.J. Super. 254, 268 (App. Div. 2003) (quoting Restatement (Second) Torts, § 766A, comment e (1977)). "'Malice' does not require proof of ill will, but it does require proof that 'the harm was inflicted intentionally and without justification or excuse.'" Senisch v. Carlino, 423 N.J. Super. 269, 278 (App. Div. 2011) (quoting Printing Mart-Morristown v. Sharp Elecs. Corp., 116 N.J. 739, 751 (1989)), certif. denied, 211 N.J. 608 (2012). "In determining whether the conduct complained

of is improper, there must be 'an evaluation of the nature of and motive behind the conduct, the interests advanced and interfered with, societal interests that bear on the rights of each party, the proximate relationship between the conduct and the interference, and the relationship between the parties.'" Main St. at Woolwich, LLC v. Ammons Supermarket, Inc., 451 N.J. Super. 135, 152 (App. Div.) (quoting Nostrame v. Santiago, 213 N.J. 109, 122 (2013)), certifs. denied, 231 N.J. 329, 335 (2017). In the present case, the Defendants acted intentionally and without justification, expressly seeking to have Plaintiff "blacklisted" regardless of the truth. As a direct result, Plaintiff has lost or been denied professional referrals, at least three colleagues or referral sources have distanced themselves from him, and specific professional opportunities have been withheld from him — causing economic damage. See Certification, ¶ 31.

4. CIVIL CONSPIRACY.

"[I]njury accomplished by means of [a] conspiracy may be treated as a distinct wrong in itself, irrespective of the steps that led to it." Louis Kamm, Inc., v. Flink, 113 N.J.L. 582, 592 (E. & A. 1934). "A civil conspiracy occurs when 'two or more persons acting in concert to commit an unlawful act, or to commit a lawful act by unlawful means, the principal element of which is an agreement between the parties to inflict a wrong against or injury upon another, and an overt act that results in damage.'" Main St. at Woolwich, LLC v.

Ammons Supermarket, Inc., 451 N.J. Super. 135, 152–53 (App. Div.) (quoting Morgan v. Union Cnty. Bd. of Chosen Freeholders, 268 N.J. Super. 337, 364, (App. Div. 1993), certif. denied, 135 N.J. 468 (1994)), certifs. denied, 231 N.J. 329, 335 (2017) (citation omitted). "While the unlawful agreement need not be expressed, and while the participants need not know all the details of the plan designed to achieve the objective or possess the same motives, they must share the general conspiratorial objective." Weil v. Express Container Corp., 360 N.J. Super. 599, 614 (App. Div.) (citing Morgan, 268 N.J. Super. at 365), certif. denied, 177 N.J. 574 (2003)). "To establish a conspiracy, the plaintiff must demonstrate that there was one plan and that its essential scope and nature was known to each person who is charged with responsibility for its consequences." Ibid. (citing Morgan, 268 N.J. super. at 365). "The gravamen of an action in civil conspiracy is not the conspiracy itself, but the underlying damage such an unlawful action engenders." Kalio Universal, Inc. v. B. A. M. Inc., 95 N.J. Super. 393, 400 (App. Div. 1967) (citing Earl v. Winne, 14 N.J. 119, 135 (1953)).

Julia Quinones and J. Does 1, 2, 4, 8, 9 and 11 have banded together on social media to (as "Roald-Dahl" put it) have Plaintiff "#blacklisted" (Exhibit A-4) in his profession – it is a coordinated attack under such names as "CodeRudy." The poster "pinktiger32" lied about Plaintiff's academic credentials, and "Roald-

Dahl" endorsed the defamation as "an exactly accurate . . . statement in which [Roald-Dahl] fully back[s] up!" Lying about sexual abuse of a girl and causing her to run away – knowing that Plaintiff did not work for that facility at that time – "Roald-Dahl" refers to the publishers of the falsehood as "We" (Exhibit A-5). The injury is especially great because these Defendants are 'verifying' each other's falsehoods to unsuspecting persons using social media to research Plaintiff.

The Twenty-Fourth Count for civil conspiracy is timely. Civil conspiracy carries no independent limitations period; it is derivative of the underlying tort — here, defamation — and runs with the one-year period of N.J.S.A. 2A:14-3. The conspiracy claim arises from the same coordinated campaign, the same Defendants, and the same statements already pleaded in the original Complaint, which was timely filed on August 7, 2025. Under R. 4:9-3, an amendment relates back to the date of the original pleading when the claim asserted arises out of the conduct, transaction, or occurrence set forth in the original pleading. Because the conspiracy claim grows from that identical factual nucleus, it relates back to August 7, 2025, is not time-barred, and is therefore not futile. Leave to add it should be freely granted under R. 4:9-1.

D. REQUEST FOR DISCOVERY.

The "request for discovery with the [c]ourt, along with a statement of reasons justifying the specific discovery requested as well as identification of a limited number of persons or entities on whom discovery process might be served and for which there is a reasonable likelihood that the discovery process will lead to identifying information about defendant that would make service of process possible[,]" Warren Hosp., 430 N.J. Super. at 231 (quoting Dendrite, 342 N.J. Super. at 152), is appended to the Novak certification as Exhibit G. As he certifies (¶ 33):

Reddit, Inc. is the single entity that maintains the registration and account records sought, and the limited identity-and-location discovery requested is reasonably likely to lead to information sufficient to permit service of process.

E. BALANCE WITH FIRST AMENDMENT INTERESTS.

"Finally, assuming the court concludes that the plaintiff has presented a prima facie cause of action, the court must balance the defendant's First Amendment right of anonymous free speech against the strength of the prima facie case presented and the necessity for the disclosure of the anonymous defendant's identity to allow the plaintiff to properly proceed." Dendrite, 342 N.J. Super. at 142.

Here, the balance favors disclosure. The prima facie case is strong and rests on the Defendants' own words, quoted and provided in physical form. False assertions that a named individual committed specific crimes against children lie

far from the core of protected anonymous expression. Disclosure is necessary: without the Defendants' identities, Plaintiff cannot serve them or proceed at all. The discovery sought is narrowly limited to identity and location. The balance tips decisively in favor of the limited discovery requested.

CONCLUSION

For the foregoing reasons, the Court should grant Plaintiff's motion, granting leave to amend the complaint and to obtain discovery.

Respectfully Submitted,

s/Rudolph Novak
Rudolph Novak

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Pro Se Plaintiff

RUDOLPH NOVAK, : SUPERIOR COURT OF NEW JERSEY
 : LAW DIVISION-CIVIL PART
Plaintiff, : MORRIS COUNTY
 : DOCKET NO. MRS-L-1804-25
V. :
 : Civil Action
JULIA QUINONES :
(A.K.A. :
"Glad-Cheesecake2959" :
and "codeadampodcast"), :
J. DOE #1 : **PROOF OF SERVICE**
("Roald-Dahl"), :
J. DOE #2 :
("pinktiger32"), :
J. DOE #4 :
("the_TTI_mom"), :
J. DOE #8 :
("Homeless-Sea-Captain"), :
J. DOE #9 :
("rjm2013"), :
J. DOE #11 ("marsha- :
linehan"), :
J. DOE #12 - #20 :
(other fictitiously- :
designated persons), :
 :
Defendants. :

Rudolph Novak, an attorney at law of the State of New Jersey, certifies
the following to be true:

1. I am the Plaintiff in this matter.
2. At present, none of the Defendants has been served.
3. On June 30, 2026, courtesy copies of this proof of service and Plaintiff's notice of motion, certification, letter memorandum and proposed form of order are being sent via overnight delivery to:

Hon. Patricia O'Dowd, J.S.C.
Morris County Courthouse
Washington and Court Streets
Morristown, NJ 07960-0910

4. In addition, on June 30, 2026, I am causing courtesy copies of the papers to be sent via e-mail (ethan@ejacobslaw.com) to California attorney Ethan Jacobs, Esq., representing Defendants J. Doe #1, J. Doe #4, J. Doe #8, and J. Doe #11 in a motion pending before the Superior Court of California, San Francisco County (Docket No. CPF-26-519752).

5. I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Date: June 30, 2026

s/ Rudolph Novak
Attorney at Law, State of NJ

EXHIBIT A-1

**Instagram User**
codeadampodcast


Code Adam Podcast

7/9/24, 1:25 PM

Code Adam Podcast · Blocked · [Edited](#)

Hey Rudy. My name is Julia Quinones. I saw you checking out the account, and I understand it might seem concerning from an outside perspective. However, I would like to express that I have no intention or interest in creating any controversy for RIDGE Maine. My intentions are always to educate and prevent abuse. To give survivors of Ironwood Maine a voice, and to validate the parents, staff, and residents who experienced ironwood Maine at the hands of the previous owners. Good luck with the rebranding. I truly hope to see big change and would love to answer any questions you might have. - ironwood Maine survivor 2012.



8/9/24, 1:36 AM

 This story is no longer available

8/9/24, 2:03 AM

 Mentioned you in their story

You've blocked this account
You can't message or video chat with codeadampodcast.

[Unblock](#)[Delete](#)

EXHIBIT A-2

codeadampodcast
Ironwood Maine, LLC

THE CODE ADAM PODCAST

RIDGE
ADOLESCENT RESIDENTIAL TREATMENT

Vice President of Clinical Partnerships
Ridge Treatment Center - Full-time
Jul 2023 - Present - 1 yr 2 mos
Milton, New Hampshire, United States
- Hybrid
RESIDENTIAL TREATMENT PROGRAM FOR YOUTH AGES 12-18 ...see more
Mental Health, Behavioral Health and +3 skills

Vice President
Altior Healthcare - Full-time
Jul 2023 - Present - 1 yr 2 mos
Ridge RTC - Teen Mental Health Treatment
Working with Adolescents, Behavioral Health and +4 skills

The Law Office of Rudolph Novak, LLC

rudynovakofficial
Austin, Texas

codeadampodcast 18s
I'm curious to know how you became Vice president of Altior Healthcare. Did you know Ironwood Maine had abuse allegations prior to your employment with Ridge? Does this new position have anything to do with Paul Achterlonie v Altior Healthcare?

PARADIGM TREATMENT

CASE NAME: PAUL AUCHTERLONIE VS ALTIOR HEALTHCARE, LLC, A LIMITED LIABILITY COMPANY, ET AL.

Director of Outreach
Turnbridge
Nov 2015 - Jul 2023 - 7 yrs 9 mos

will never forgive turnbridge for the damage they inflicted me

NATSAP Associate Individual Professional Member
National Association of Therapeutic Schools and Programs (NATSAP)
Feb 2017 - Jul 2020 - 3 yrs 6 mos
National

rudynovakofficial
Sheraton Denver Downtown Hotel

NAATPNATIONAL2024

I'm Attending!
Join me at #NAATP2024
naatp.com/conference | May 19-21, 2024 | Denver, CO

the_TTL_mom · 9h
|| TT16 || Intelligence Operative
There are so many HIPPA violations going on in that place it's frightening!

pinktiger32 · 11h
|| TT16 || Intelligence Operative
I think a better question is "who else was sexually assaulted at Turnbridge??"

17 likes

codeadampodcast @ridgertc & @rudynovakofficial
What is being done to prevent ABUSE & NEGLECT?

#ironwoodmainesurvivor #tti #residentialtreatment #wilderness #tickillness #troubledteenindustry #turnbridge #abuse #neglect #allegations

View all 9 comments

August 9

EXHIBIT A-4

r/troubledteens

Search in r/troubledteens

+

Create

r/troubledteens

5 mo. ago

Roald-Dahl

Assistant Moderator

Welcome to Maine, Rudy Novak (Altior/The Ridge/Ironwood) — you'll fit in perfectly with the rest of the diabolically corrupt TTI devils ruining the entire state and its education system

Information

Anyone know where this utter doofus attended law school? Apparently a "night" law school in a strip mall somewhere? Fitting!



rvnlaw.com

Open

22

14

Share

Add a comment

Sort by: Old

Search Comments

Glad-Cheesecake2959

5mo ago

Can anyone give a hot take on this

Rudy Mug

2

Reply

Award

Share

Roald-Dahl

OP

5mo ago

Edited 5mo ago

Assistant Moderator

I like it. A lot. They should definitely have a "NATSAP 2024" graphic on them, though. Just my opinion, of course.

Edit/addition—hopefully this depiction of corruption and sickness (see STLF logo) could (also) be included on one of the mug designs or something, such as t-shirts?



r/troubledteens

Join

Anti-Troubled Teen Industry Activism & Survivor Support

We are a community of survivors and advocates who oppose the abusive Troubled Teen Industry. We seek to raise...

Show more

Created Mar 26, 2011

Public

48K

22

Top 3%

Members

Online

Rank by size

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TTI6

Moderators

IMPORTANT INFORMATION

Please click on the buttons below to link you to our most important resources on the Subreddit Wiki.

What is the TTI?

FAQ's about the TTI

The Program Watchlist

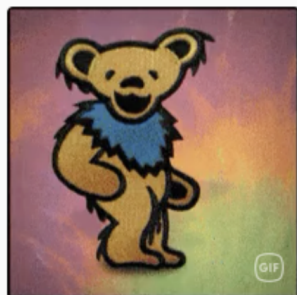
The Program Database

The Survivor Database

The Official TTI Survey

EXHIBIT A-4

ALL OF YOU ARE NOT "BEAR'S CHOICE"



2

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 Award
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 ...



pinktiger32 • 5mo ago •

|| TTI6 || Intelligence Operative

Rudy Novack drinks hotdog water! 🌭

9

 Reply
 1
 Share
 ...



krsweidy • 5mo ago •

<https://www.rvnlaw.com/rudy-novak-esq.html>
<https://www.linkedin.com/in/rudynovak/>

According to his website, he attended Rutgers School of Law. Also according to his website:

Prior to his government service, he served as a Certified Legal Intern for the Children's Justice Clinic at Rutgers School of Law – Camden. There, he was responsible for providing all aspects of legal representation to juvenile clients. He was credited with his role in obtaining a pre-trial dismissal for a wrongfully charged juvenile after extensive briefing. He was interviewed and quoted in The Philadelphia Inquirer's article on the Children's Justice Clinic as a result of his contributions.

According to LinkedIn, he is getting his Masters in Marriage and Family Therapy from Touro University Worldwide. Dates of Enrollment 2024-2026. Lawyer with undergraduate degree in Business Administration and now pursuing online therapy degree becomes TTI "therapist" is a "career path" one rarely sees (thank goodness). These are just the facts that I could uncover. Please DO NOT ask me my opinion of this "situation."

3

 Reply
 Award
 Share
 ...



pinktiger32 • 5mo ago •

|| TTI6 || Intelligence Operative

As an attorney who attended a t25 school...I can tell you that Rutgers-Camden is a 4th tier law school. Touro University World Wide isn't even accredited. Looks like Rudy likes spending daddy's money at these bottom feeder schools that print diplomas.



7

 Reply
 1
 Share
 ...



Roald-Dahl OP • 5mo ago •

|| Assistant Moderator ||

This is an **exactly** accurate assessment and statement in which I fully back up!

7

 Reply
 Award
 Share
 ...

EXHIBIT A-5

r/troubledteens • 25 days ago
Roald-Dahl
...

!! RUNAWAY AT TURNBRIDGE !! (Killingworth, CT campus) – **Silver Alert has been cancelled for missing 14-yr. old girl (who probably fled bc she was sick and tired of drinking 🌭 Rudy Novak's 🌭 hot dog water)**

[Information](#)

<https://www.wfsb.com/2024/12/09/silver-alert-issued-14-year-old-girl-killingworth/>

Silver Alert canceled for 14-year-old girl from Killingworth

<https://www.msn.com/en-us/news/crime/silver-alert-canceled-for-14-year-old-girl-from-killingworth/ar-AA1vx9pG>

Transcript 📄

KILLINGWORTH, CT (WFSB) - A teenage girl from Killingworth was reported missing to state police. 🌭

However, troopers reported on Monday morning that she had been found "safe." 🌭

Troopers said the 14-year-old was reported missing since Sunday, Dec. 8. 🌭

They issued a Silver Alert on Monday, which was canceled later in the morning. They said she was an endangered runaway. 🌭

They described her as having black hair and brown eyes. She stands 5'3" tall and weighs about 113 pounds. 🌭

She was last seen wearing a black sweatshirt with a white symbol on it and black pants. 🌭

Anyone with information about **Sabrina's** whereabouts was asked to contact state police at 860-399-2100. 🚔

P.S. [u/Roald-Dahl](#) Are you SURE that the "Treatment facility" was for sure **TURNBRIDGE** ?

YES. THE ADDRESS MATCHES.

P.S.S. We *ALMOST* didn't catch this, TTI / Turnbridge...you crafty fraudulent mess of a HORRIBLY ABUSIVE completely not at all helpful shitshow of a program that tried to cover this up. There is a REASON these kids keep feeling the need to runaway to protect themselves.

Notes to parents:

▶ TURNBRIDGE = HARD PASS ▶

The Admissions Team is lying and manipulating you and your child

Therapeutic Educational Consultants can NEVER be trusted. (Literally not ever.)

Do NOT buy their lies.

DO believe Reddit

Last thing... didn't this SAME exact runaway thing JUST happen at Rudy's program "Ridge RTC" in Milton, NH?

EXHIBIT A-5


hydebadattitude · 25d ago ·

Hyde kicked me out after the 3rd time I ran. In January. In Maine. But then my parents were considered deadbeats because they wouldn't donate over and above the quoted tuition.


 6
  Reply
  Award
  Share
 ...


Ok-News7798 · 24d ago ·
 JennMarieX

I sincerely can't wait to blow up this entire industry!!!


 6
  Reply
  Award
  Share
 ...


Ok-News7798 · 25d ago ·
 JennMarieX

Facts!


 7
  Reply
  Award
  Share
 ...


the_TTI_mom · 25d ago · Edited 25d ago ·
 || 🧑 || TTI6 || Intelligence Operative

Rudy Novak can choke on his own hotdog 🌭 every SINGLE parent I've spoken to who had experience with Turnbridge was lied to, manipulated and abused. I can't tell you the number of HIPAA violations I saw there. PARENTS, DO NOT SEND YOUR KIDS to THAT HELLHOLE!!!! So Matt Leahy will fill you up with lies and has pretty much no idea what's even on their website or what goes on there. When pressed beyond his capacity (which is ultra low) he runs and sends Jamie Hazelton to rescue him. Seriously, this place sucks all the hotdogs Novak could serve up!


 19
  Reply
  1
  Share
 ...


Roald-Dahl OP · 25d ago ·
 || 🧑 || Assistant Moderator || 🇺🇸




 5
  Reply
  Award
  Share
 ...


TBthrowawaylol · 4d ago ·

TB alum here from 2015-2016. What kind of abuses were people having? I didn't really think it was that bad. Sounds like a lot has changed since then.


 -1
  Reply
  Award
  Share
 ...

EXHIBIT A-3

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r/troubledteens · 5 mo. ago · Glad-Cheesecake2959

Introducing Rudy Novak

Information

Altior Healthcare - Vice President

Ridge RTC - Vice President of clinical partnerships

Paradigm Treatment - Vice President of clinical partnerships

Turnbridge - Director of Outreach

NATSAP - Individual Member

30

36

2

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pinktiger32 · 5 mo ago · **TT16 Intelligence Operative**

Rudy Novak is heila cringe. What a man-baby.

10

1

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r/troubledteens

Join

Anti-Troubled Teen Industry Activism & Survivor Support

We are a community of survivors and advocates who oppose the abusive Troubled Teen Industry. We seek to raise...

Show more

Created Mar 26, 2011

Public

48K Members

22 Online

Top 3% Rank by size

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IMPORTANT INFORMATION

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The Survivor Database

The Official TTI Survey

EXHIBIT A-3



pinktiger32 · 5mo ago ·

TT16 Intelligence Operative

Rudy Novak is hella cringe. What a man-baby.

10 Reply 1 Share ...



FeknProvoSucks · 5mo ago ·

It's the top left pick for me... grown a\$\$ man posing as a five year old, should "restrain" himself, maybe isolate for a while!

4 Reply 1 Share ...



Glad-Cheesecake2959 OP · 5mo ago ·



Sent July 9th, no response

7 Reply Award Share ...



Glad-Cheesecake2959 OP · 5mo ago ·

Rudy,

If you're reading this, I want to bring to your attention the serious issue of abuse that survivors have faced. As you prepare to market new programs to vulnerable parents and troubled teens, it's crucial to understand the context of what has occurred prior to your arrival.

I would appreciate it if you could address this important question: How will Altior Healthcare ensure that abuse and neglect are prevented in the future?

Thank you for your attention to this matter. -the Code Adam Podcast

9 Reply 1 Share ...



Roald-Dahl · 5mo ago · Edited 5mo ago ·

Assistant Moderator

Sadly, Rudy Novak's **complete failure** of a track record indicates nothing will change. People are giving this guy much too much leeway; he'll screw up again and again without a doubt in my mind. Of course he's chosen Maine. There are no rules there!

Plus this:



EXHIBIT A-3

 pinktiger32 · 5mo ago ·




↑ 4 ↓ Reply Award Share ...

 Glad-Cheesecake2959 OP · 5mo ago ·

I don't hate him; I don't know him. I only know that his role is to assist families in crisis and support children. What I don't understand is why he hasn't responded regarding the actions taken in regards to abuse allegations against Chris Johnson and Alex Blackstone and their employment at Ridge Maine. He is aware of the allegations, as he regularly engages with Code Adam Podcast stories and has been contacted directly prior to this post. If Rudy is unwilling to communicate, I feel it is my duty to share this information publicly so that everyone is informed about what transpired at Ridge Maine before Rudy's employment with Altior Healthcare.

↑ 7 ↓ Reply Award Share ...

 Glad-Cheesecake2959 OP · 5mo ago ·

The ongoing issue with programs that receive 'rave reviews' you mentioned is a lack of transparency. We need to understand how abuse will be prevented to ensure it doesn't happen again. I truly believe that Rudy and treatment centers can inspire genuine recovery, yet the reality is that children are being abused, ignored, and censored. Rudy Novak is young and well-informed, and I believe he should engage with survivors to find a way to enhance transparency for everyone involved. We need change now more than ever to prevent abuse and neglect.

For any parent considering one of Altior Healthcare's RTCs, ask yourself: Will my child have access to 988 or 911? Can my child report abuse? What are the names and employment histories of the staff who will spend the majority of the day with my child? Why are these questions so difficult to answer when the safety and well-being of minors are at stake?

↑ 9 ↓ Reply Award Share ...

 Glad-Cheesecake2959 OP · 5mo ago ·

So you can further understand, I will leave you with this.

♥ IRONWOOD ANGELS ♥

Hillary Fairies 19 years old January 2, 1992-October 26, 2011 
<https://www.legacy.com/obituaries/name/hilary-faries-obituary?pid=154305814>

Juliana Marlene Mensch (Julie) 18 years old 1994-March 29, 2012 
<https://www.legacy.com/us/obituaries/courierpostonline/name/juliana-mensch-obituary?id=21975351>

Peter Cernansky 18 years old 3/11/1994-9/30/2012 
<https://www.legacy.com/us/obituaries/stamfordadvocate/name/peter-cernansky-obituary?id=19061182>

Angelica Hall 18 years old 1994-2012 : <https://www.legacy.com/obituaries/name/angelica-hall-obituary?pid=157742892>

Samuel T Cranstoun 21 years old April 30, 1992 - December 3, 2013 
<https://www.peppierfh.com/obituary/2341183>

Kevin Jackson 23 years old October 27, 1991-September, 2014 
https://www.fastpeoplesearch.com/kevin-jackson_id_G-6379760357782630468?

Kyle Adam Bronstein 18 years old (July 28, 1997- April 7th, 2016) 
<https://www.legacy.com/obituaries/name/kyle-adam-bronstein-obituary?pid=157742892>

EXHIBIT A-6

↑ 1 ↓ Award Share ...

 **marsha-linehan** · 2h ago

This account is 7 hours old everybody. Just saying. 🍌 Plus, Hot Dog Rudy has been trying to infiltrate this sub recently and was also reportedly banned multiple times from it. If you're a survivor, here I would strongly suggest refraining from giving Turbridge any kind of ammunition or anything bc this is really suspect to me.

If I'm wrong, I'm wrong, but it's better to warn people about **Rudy Novak** and be wrong than not to have warned people at all considering the mass destruction of human beings and the level of human trafficking. He has been engaged with for decades now despite being very young.

↑ 2 ↓ Award Share ...

 **ichooseiif** · 6h ago

EXHIBIT A-7



Roald-Dahl • 17d ago

|| Junior Moderator ||

Is this HOT DOG RUDY NOVAK by chance? I'm not buying these Tunbridge posts based on historical internal mod knowledge. I would not bite people. 🍌🍌🍌



10



Reply



Award



Share



the_TTI_mom • 17d ago

|| TTI6 || Intelligence Operative

If it's HOT DOG Rudy, he wont give his number although I'd love to have a chat with the scum bag and tell him what I think of his profession in child abuse. If it's a real call for help, I will let you know.



6



Reply



Award



Share



juneneneneif **OP** • 17d ago

i'm so confused what are u saying



2



Reply



Award



Share



EXHIBIT A-8

r/troubledteens · 2 mo. ago

Homeless-Sea-Captain

Rudy Novak announces his new TTI Bird Sanctuary Clinical Partnership 🦜🦆😄 on the shuttered Ironwood Maine campus

News



newswire.com

Open

"With more than 400 acres of serene, natural landscape, Ridge RTC Maine provides an ideal setting for Avian Haven's remarkable bird rehabilitation efforts"

What do y'all think about this new development for Altior Healthcare? 😄

Seriously, though. I wonder if interventionist Rudolph—also associated with Turnbridge, Paradigm, and several other programs—ever feels guilty about the Ironwood parent (a mother) who died by suicide because of the Horton family. He and Ironwood then tried to cover it up by abruptly closing the program just a week after she had launched a "Close Ironwood" petition. That's the real reason Ironwood shut down, by the way. They treated her so terribly and bullied her so much that it drove her to take her own life. <https://www.ironwoodmaine.com>

21

5

1

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Join the conversation

EXHIBIT A-9





r/troubledteens

12 days ago

marsha-linehan



The Story of Rudolph "Rudy" Novak (from Altior Healthcare and too many other destructive TTI / recovery programs and organizations to list at this point...)

Information

There he is (see photo) wearing a **Turnbridge** (Connecticut) fleece, by the way

Also, learned he was (is?) on the **NATSAP Alumni Council** (frightening fact)



 8 

 18

 1

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marsha-linehan

OP

12d ago

This is from 2017

EXHIBIT A-9



marsha-linehan OP • 12d ago •

This is from 2017

1 Reply Award Share ...



pinktiger32 • 12d ago •

|| TTI6 || Intelligence Operative

This man has the definition of a punchable fucking face.

5 Reply 1 Share ...



Roald-Dahl • 12d ago • Edited 12d ago •

|| Assistant Moderator ||



pinktiger32 • 5mo ago •

Rudy Novak is hella cringe. What a man-baby.

10 Reply ...

One of my very most favorite things that has ever been said in this entire [r/troubledteens](#) sub is this. This (now) 🙌 is also a very strong response.

Rudy has LITERALLY outed his entire awful *g/oba/* human trafficking playbook.

People should listen to this—he sounds like a pompous twit and actually speaks with a Krissy Pozatek of The Parallel Process inflection....(i.e. "Riiight???) <https://www.parallel-process.com/about-1>

I've only listened to part of this so far, but what I've heard is so good that I'm actually going to go and transcribe this for everybody. It is so representative of the mentality and delusion of this entire industry. Rudy, you're a very pompous human being. (That went to an embarrassing law school in a **strip mall**. And arranges kidnappings.)

2 Reply Award Share ...



pinktiger32 • 12d ago •

|| TTI6 || Intelligence Operative

He's a vile little shrimp dicked troll of a man.

2 Reply 2 Share ...



Roald-Dahl • 12d ago •

|| Assistant Moderator ||

u/the_TTI_mom and u/Glad-Cheesecake2959 — you will probably be interested in this post... 🍌

3 Reply Award Share ...



the_TTI_mom • 12d ago •

|| TTI6 || Intelligence Operative

He is a vile, pompous and a troll. He deserves a HARD kick to the balls.

EXHIBIT A-10



InternationalRead593 • 1d ago

Can someone shed some insight as to why this specific person is hated in the community? I'm so curious



1



Reply



Award



Share



rjm2013 • 11h ago • Edited 11h ago

|| ★ || Chief Administrator ||

Thursday, October 16, 2025 at 2:57:24 PM UTC

There are many TTI hotdogs that we like to comedically roast.

If you think Hot Dog Rudy is "hated", then you clearly haven't heard about Fat Sue, Graham Cracker, Uncle Timmy, Drunk Kate, Pennywise, Taco Wendy, Tonsil Stone, the ELDERLY one, Smokey Jennings, Lego Hair Jeannie, and so on. Rudy is insignificant compared to them.

So what is "wrong" with Rudy? It's simple: he gets it absolutely wrong. The TTI kidnapping kids and holding them against their will for profit? It's never going to be acceptable. Not ever.



1



Reply



Award



Share



EXHIBIT B

SUBP-045

ATTORNEY OR PARTY WITHOUT ATTORNEY (<i>Name, State Bar number, and address</i>): Leah Rosa Vulic, SBN: 343520; Jeffrey M. Rosenfeld, SBN: 222187 Kronenberger Rosenfeld, LLP 548 Market St. #85399 San Francisco, CA 94104 TELEPHONE NO.: 415-955-1155 FAX NO.: 415-955-1158 E-MAIL ADDRESS: leah@kr.law ATTORNEY FOR (<i>Name</i>): Plaintiff Rudolph Novak	FOR COURT USE ONLY
Court for county in which discovery is to be conducted: SAN FRANCISCO SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO STREET ADDRESS: 400 McAllister St. MAILING ADDRESS: 400 McAllister St. CITY AND ZIP CODE: San Francisco, 94102 BRANCH NAME: Civic Center Courthouse	
Court in which action is pending: Superior Court of New Jersey - Morris County Name of Court: SUPERIOR COURT OF NEW JERSEY STREET ADDRESS: 43-47 High St MAILING ADDRESS: 43-47 High St CITY, STATE, AND ZIP CODE: Newton, New Jersey 07860 COUNTRY: USA	
PLAINTIFF/PETITIONER: Rudolph Novak DEFENDANT/RESPONDENT: Julia Quinones, et.al.	CALIFORNIA CASE NUMBER (if any assigned by court):
DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE AND PRODUCTION OF DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND THINGS IN ACTION PENDING OUTSIDE CALIFORNIA	CASE NUMBER (of action pending outside California): MRS-L-1804-25

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (*name, address, and telephone number of deponent, if known*):

Reddit, Inc. c/o CSC, 2710 Gateway Oaks Drive, Ste. 150N, Sacramento, CA 95833

1. **YOU ARE ORDERED TO APPEAR IN PERSON TO TESTIFY AS A WITNESS in this action at the following date, time, and place:**

Date: May 27, 2026	Time: 10:00am	Address: Mills Building, 220 Montgomery St, San Francisco, 94104
--------------------	---------------	--

- a. ☒ As a deponent who is not a natural person, you are ordered to designate one or more persons to testify on your behalf as to the matters described in item 4. (Code Civ. Proc., § 2025.230.)
- b. ☒ You are ordered to produce the documents, electronically stored information, and things described in item 3.
- c. This deposition will be recorded stenographically ☐ through the instant visual display of testimony and by ☐ audiotape ☒ videotape.
2. The personal attendance of the custodian or other qualified witness and the production of the original records are required by this subpoena. The procedure authorized by Evidence Code sections 1560(b), 1561, and 1562 will not be deemed sufficient compliance with this subpoena.
3. The documents, electronically stored information, and things to be produced and any testing or sampling being sought are described as follows (*if electronically stored information is required, the form or forms in which each type of information is to be produced may be specified*): See Attachment 3

☒ Continued on Attachment 3 (*use form MC-025*).

4. If the witness is a representative of a business or other entity, the matters upon which the witness is to be examined are described as follows:

☐ Continued on Attachment 4 (*use form MC-025*).

5. Attorneys for the parties to this action or parties without attorneys are (*name, address, telephone number, and name of party represented*):
See Attachment 5

☒ Continued on Attachment 5 (*use form MC-025*).

Page 1 of 2

SUBP-045

PLAINTIFF/PETITIONER: Rudolph Novak DEFENDANT/RESPONDENT: Julia Quinones, et.al.	CASE NUMBER:
---	--------------

6. ☐ Other terms or provisions from out-of-state subpoena, if any (*specify*):

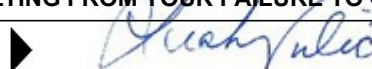
☐ Continued on Attachment 6 (*use form MC-025*).

7. **If you have been served with this subpoena as a custodian of consumer or employee records under Code of Civil Procedures section 1985.3 or 1985.6 and a motion to quash or an objection has been served on you, a court order or agreement of the parties, witnesses, and consumer or employee affected must be obtained before you are required to produce consumer or employee records.**

8. *At the deposition, you will be asked questions under oath. Questions and answers are recorded stenographically at the deposition; later they are transcribed for possible use at trial. You may read the written record and change any incorrect answers before you sign the deposition. You are entitled to receive witness fees and mileage actually traveled both ways. The money must be paid, at the option of the party giving notice of the deposition, either with service of this subpoena or at the time of the deposition. Unless the court orders or you agree otherwise, if you are being deposed as an individual, the deposition must take place within 75 miles of your residence. The location of the deposition for all deponents is governed by Code of Civil Procedure section 2025.250.*

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF \$500 AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: April 30, 2026



(SIGNATURE OF PERSON ISSUING SUBPOENA)

Leah Rosa Vulic

California Counsel for Plaintiff

(TYPE OR PRINT NAME)

(TITLE)

PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE AND PRODUCTION OF DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND THINGS

1. I served this *Deposition Subpoena for Personal Appearance and Production of Documents, Electronically Stored Information, and Things in Action Pending Outside California* by personally delivering a copy to the person served as follows:

a. Person served (*name*):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. Witness fees and mileage both ways (*check one*):

(1) ☐ were paid. Amount: \$ _____

(2) ☐ were not paid.

(3) ☐ were tendered to the witness's public entity employer as required by Government Code section 68097.2. The amount tendered was (*specify*): \$ _____

f. Fee for service: \$ _____

2. I received this subpoena for service on (*date*):

3. ☐ I also served a completed *Proof of Service of Notice to Consumer or Employee and Objection* (form SUBP-025) by personally delivering a copy to the person served as described in 1 above.

4. Person serving:

a. ☐ Not a registered California process server

b. ☐ California sheriff or marshal

c. ☐ Registered California process server

d. ☐ Employee or independent contractor of a registered California process server

e. ☐ Exempt from registration under Business and Professions Code section 22350(b)

f. Name, address, telephone number, and, if applicable, county of registration and number:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:



(SIGNATURE)

(For California sheriff or marshal use only)
I certify that the foregoing is true and correct.

Date:



(SIGNATURE)

Attachment 3
Documents, Electronically Stored Information, and Things To Be Produced

1. Documents sufficient to identify the individuals who created, controlled, maintained, or operated the Reddit accounts below; and all non-content transactional change history, including all non-content related metadata, for the Reddit accounts identified below:

- (1) Julia Quinones
- (2) Glad-Cheesecake
- (3) codeadampodcast
- (4) Roald-Dahl
- (5) Pinktiger32
- (6) Dazzling-Sundae907
- (7) the_TTI_mom
- (8) silentspectator27
- (9) Routine-Bottle-7466
- (10) LeukorrhealsACommie
- (11) Homeless-Sea-Captain
- (12) rjm2013
- (13) Signal-Strain9810
- (14) marsha-linehan

(the “Accounts”). Such documents should include documents, if possessed by Reddit, that reflect the name(s), email address(es), personal information (including date of birth, gender, and mobile phone number), recovery email address(es) and associated information, internet protocol (“IP”) address(es) for registration, logins, and logouts, Media Access Control (“MAC”) address(es), International Mobile Equipment Identity (“IMEI”) numbers, payment information, billing address(es), and/or any other identifying or contact information (“Identifying Information”) for the Accounts.

2. Documents sufficient to identify any other accounts linked with the Accounts.

Novak v. Quinones, et al.

Case No. MRS-L-1804-25

3. Documents sufficient to identify all other Reddit usernames and names utilized by the Accounts, including Identifying Information.

4. All non-content transaction change history, including all non-content related metadata, for the Accounts.

5. Documents in your possession, custody, or control respecting the Accounts' archived data or logs.

The subpoena requests documents in your possession, custody, or control and includes any and all archived data or logs.

“Document(s)” shall mean all writings under Cal. Evid. Code §250 in whatever form or medium, including electronically stored information. The subpoena seeks documents within your possession, custody, or control. The subpoena specifically excludes any communications, contents of a user’s private mail messages, or stored content files held or maintained on behalf of a user that are protected by the Stored Communications Act, 18 U.S.C. §2701, et seq.

Novak v. Quinones, et al.

Case No. MRS-L-1804-25

Attachment 5

Attorneys for the Parties to this Action or Parties Without Attorneys

Rudolph Novak (NJ Attorney ID #003582010)
5 Ridgewood Drive
Randolph, NJ 07869
(856) 906-2980
rudy@rvnlaw.com

Pro Se Plaintiff

Jeffrey M. Rosenfeld
Leah Rosa Vulić
KRONENBERGER ROSENFELD, LLP
548 Market Street #85399
San Francisco, CA 94104-5401
(415) 955-1155

California Counsel for Plaintiff Rudolph Novak

Defendants JULIA QUINONES (A.K.A. “Glad-Cheesecake” and “codeadampodcast”), J. DOE #1 (“Roald-Dahl”), J. DOE #2 (“Pinktiger32”), J. DOE #3 (“Dazzling-Sundae907”), J. DOE #4 (“the_TTI_mom”), J. DOE #5 (“silentspectator27”), J. DOE #6 (“Routine-Bottle-7466”), J. DOE #7 (“LeukorrhealsACommie”), J. DOE #8 (“Homeless-Sea-Captain”), J. DOE #9 (“rjm2013”), J. Doe #10 (“Signal-Strain9810”), J. DOE #11 (“marsha-linehan”), J. DOE #12 - #20 (other fictitiously-designated persons)

Rudolph Novak (NJ Attorney ID #003582010)
 5 Ridgewood Drive
 Randolph, NJ 07869
 Phone: 856-906-2980
 E-Mail: rudy@rvnlaw.com
 Pro Se Plaintiff

 RUDOLPH NOVAK, : SUPERIOR COURT OF NEW JERSEY
 : LAW DIVISION-CIVIL PART
 Plaintiff, : MORRIS COUNTY
 : DOCKET NO. MRS-L-1804-25

V. :
 : Civil Action

JULIA QUINONES :
 (A.K.A. "Glad-Cheesecake" :
 and "codeadampodcast"), :
 J. DOE #1 : **SUBPOENA DUCES TECUM AND**
 ("Roald-Dahl"), : **AD TESTIFICANDUM**
 J. DOE #2 :
 ("Pinktiger32"), :
 J. DOE #3 :
 ("Dazzling-Sundae907"), :
 J. DOE #4 :
 ("the_TTI_mom"), :
 J. DOE #5 :
 ("silentspectator27"), :
 J. DOE #6 :
 ("Routine-Bottle-7466"), :
 J. DOE #7 :
 ("LeukorrhealsACommie"), :
 J. DOE #8 :
 ("Homeless-Sea-Captain"), :
 J. DOE #9 :
 ("rjm2013"), :
 J. Doe #10 ("Signal- :
 Strain9810") :
 J. DOE #11 ("marsha- :
 linehan"), :
 J. DOE #12 - #20 :
 (other fictitiously- :

designated persons), :
:
Defendants. :

To: Custodian of Records
Reddit, Inc. in San Francisco California
c/o Corporation Service Company
2710 Gateway Oaks Drive, Suite 150N
Sacramento, CA 95833

Courtesy copy to:
Reddit, Inc.
548 Market Street, #16093
San Francisco, CA 94104-5401

YOU ARE HEREBY COMMANDED TO APPEAR AT The Mills Building,
220 Montgomery St, San Francisco, California 94104, on Wednesday, May 27,
2026, at 10:00 a.m., and testify in connection with the above-captioned action.

At that time and place, YOU ARE FURTHER COMMANDED to bring with
you and produce the documents identified in Rider A appended hereto.

The subpoenaed evidence shall not be produced or released until the date
specified for the taking of the deposition. If the deponent is notified that a
motion to quash the subpoena has been filed, the deponent shall not produce or
release the subpoenaed evidence until ordered to do so by the court or the release
is consented to by all parties to the action.

Failure to comply according to the command of this subpoena will subject you
to a penalty, damages in a civil suit and punishment for contempt of court.

Date: April 27, 2026

/s/ Michelle M. Smith
MICHELLE M. SMITH, Clerk of the Superior Court
By Rudolph Novak (In the Name of the Clerk of the
Court, Pursuant to Court Rules 4:14-7(a) and 1:9-1)

Rider A
Documents To Be Produced

1. Documents sufficient to identify the individuals who created, controlled, maintained, or operated the Reddit accounts below; and all non-content transactional change history, including all non-content related metadata, for the Reddit accounts identified below:

- (1) Julia Quinones
- (2) Glad-Cheesecake
- (3) codeadampodcast
- (4) Roald-Dahl
- (5) Pinktiger32
- (6) Dazzling-Sundae907
- (7) the_TTI_mom
- (8) silentspectator27
- (9) Routine-Bottle-7466
- (10) LeukorrhealsACommie
- (11) Homeless-Sea-Captain
- (12) rjm2013
- (13) Signal-Strain9810
- (14) marsha-linehan

(the “Accounts”). Such documents should include documents, if possessed by Reddit, that reflect the name(s), email address(es), personal information (including date of birth, gender, and mobile phone number), recovery email address(es) and associated information, internet protocol (“IP”) address(es) for

registration, logins, and logouts, Media Access Control (“MAC”) address(es), International Mobile Equipment Identity (“IMEI”) numbers, payment information, billing address(es), and/or any other identifying or contact information (“Identifying Information”) for the Accounts.

2. Documents sufficient to identify any other accounts linked with the Accounts.

3. Documents sufficient to identify all other Reddit usernames and names utilized by the Accounts, including Identifying Information.

4. All non-content transaction change history, including all non-content related metadata, for the Accounts.

5. Documents in your possession, custody, or control respecting the Accounts' archived data or logs.

FILED

APR 24 2026

Patricia J. O'Dowd, J.S.C.

Rudolph Novak (NJ Attorney ID #003582010)
 5 Ridgewood Drive
 Randolph, NJ 07869
 Phone: 856-906-2980
 E-Mail: rudy@rvnlaw.com
 Pro Se Plaintiff

 RUDOLPH NOVAK, : SUPERIOR COURT OF NEW JERSEY
 :
 Plaintiff, : LAW DIVISION-CIVIL PART
 :
 : MORRIS COUNTY
 :
 : DOCKET NO. MRS-L-1804-25

V. :
 :
 : Civil Action

JULIA QUINONES :
 (A.K.A. "Glad-Cheesecake" :
 and "codeadampodcast"), :
 J. DOE #1 : **ORDER REINSTATING COMPLAINT**
 ("Roald-Dahl"), :
 J. DOE #2 :
 ("Pinktiger32"), :
 J. DOE #3 :
 ("Dazzling-Sundae907"), :
 J. DOE #4 :
 ("the_TTI_mom"), :
 J. DOE #5 :
 ("silentspectator27"), :
 J. DOE #6 :
 ("Routine-Bottle-7466"), :
 J. DOE #7 :
 ("LeukorrhealsACommie"), :
 J. DOE #8 :
 ("Homeless-Sea-Captain"), :
 J. DOE #9 :
 ("rjm2013"), :
 J. Doe #10 ("Signal- :
 Strain9810") :
 J. DOE #11 ("marsha- :
 linehan"), :
 J. DOE #12 - #20 :
 (other fictitiously- :

designated persons), :
 :
 Defendants. :

This matter having been brought before the Court on motion by Rudolph Novak, the pro se Plaintiff; and the Court having reviewed the papers submitted in support of the motion; and the Court having reviewed any papers submitted in opposition to the motion; and good cause for granting the motion appearing; it is on this 24th day of April, 2026, ordered as follows:

1. Plaintiff's motion is granted.

2. The Court finds good cause and herewith reinstates Plaintiff's complaint, which had been administratively dismissed for failure to prosecute.

3. When Plaintiff identifies and serves the defendants with the complaint, a copy of this order shall be appended to the complaint.

4. This Court made findings of fact and conclusions of law in deciding Plaintiff's motion. The findings and conclusions are set forth in an opinion which is X in writing ___ verbally set forth on the record.

5. The opinion referenced in paragraph 4 issued on the following date(s):
 April 24, 2026.

Patricia J. O'Dowd

 Hon. Patricia O'Dowd, J.S.C.

Plaintiff's motion was:

☐ Opposed

☒ Unopposed

Good casue shown as required by R. 1:13-7(a).

EXHIBIT C



Perkins Coie LLP
700 Thirteenth Street, N.W. Suite 800
Washington, DC 20005-3960

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F. +1.202.654.6211
perkinscoie.com

May 4, 2026

Courtney Otto
COtto@perkinscoie.com
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VIA EMAIL

Leah Rosa Vulic
Jeffrey M. Rosenfeld
Kronenberger Rosenfeld, LLP
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(415) 955-1155
leah@kr.law
Jeff@kr.law

Re: Subpoena to Non-party Reddit, Inc., *Novak v. Quinones* (N.J. Super. Ct., Morris Cnty.) Case No. MRS-L-1804-25, Internal Ref. No. 17829375

Dear Leah and Jeffrey:

We represent Reddit, Inc. (“Reddit”) and write in response to the domesticated subpoena *duces tecum* and *ad testificandum* (“Subpoena”), dated April 30, 2026, that you obtained in relation to the above-referenced matter. For the reasons below, non-party Reddit objects to the Subpoena in its entirety. I understand that you would like to meet and confer regarding this subpoena. In the email accompanying this letter, I have communicated with you regarding scheduling a call. During our conversation, we can discuss these objections if you disagree with them.

First, all legal process must properly identify the Reddit accounts at issue by providing valid account identifiers. “Julia Quinones” is not a valid username and cannot be traced to a specific Reddit account because Reddit usernames cannot have spaces. Furthermore, “codeadampodcast” and “LeukorrhealsACommie” are not associated with an existing Reddit account. Accordingly, Reddit does not have any information that is responsive to your request for information associated with “Julia Quinones,” “codeadampodcast,” or “LeukorrhealsACommie.”

Second, if you believe any of the accounts listed in the Subpoena may belong to a party to your litigation, a request for production directly to the account holder is the appropriate way to obtain data regarding their accounts.¹ Litigants have an obligation to avoid imposing an undue burden on non-parties, and non-party discovery should therefore occur only if the information is not available through discovery from the parties to the litigation themselves. *See In re Centrix Fin., LLC*, No. 12-6471 (AET), 2012 WL 6625920, at *6 (D.N.J. Dec. 18, 2012) (finding that a

¹ Reddit users can access their data as described in Reddit’s Help Center. *See* Reddit, *Where and how can I access my Reddit data and information?*, <https://support.reddithelp.com/hc/en-us/articles/360043483511> (last updated Apr. 2026).

May 4, 2026

Page 2

party must “exhaust[] all potential discovery” from other parties before subpoenaing information from a non-party); *Twp. of Gloucester v. Lakeview Realty Inv. Assocs.*, No. 006879-2018, 2018 WL 4346807, at *3 (N.J. Tax Ct. Sept. 11, 2018) (“Plaintiff has not demonstrated a substantial need for the production of these documents which it could obtain already from defendant. The object of our discovery rules are to enable a litigant to obtain insight into an adversary’s evidence and cause of action, not to burden a non-party to the litigation with requests for discovery which seek duplicative information that it may obtain by a litigant to the action.”); *Harvey v. Nissan N. Am., Inc.*, No. C-12016-04, 2005 WL 1010501, at *5-6 (N.J. Super. Ct. Ch. Div. Apr. 5, 2005) (quashing non-party subpoena in part because the subpoena placed a burden on non-parties that should be borne by requesting party); *Calcor Space Facility, Inc. v. Superior Court*, 53 Cal. App. 4th 216, 225 (1997) (“As between parties to litigation and non-parties, the burden of discovery should be placed on the latter only if the former do not possess the material sought to be discovered.”).

Third, to the extent you do not know who is associated with the accounts in question, Reddit objects to the Subpoena’s demands for non-content identifying information (*e.g.*, name, email address, IP address, or phone number) about anonymous Reddit users without first obtaining an appropriate court order, as required by the First Amendment. The right to anonymous speech under the First Amendment is well-established. *See McIntyre v. Ohio Elections Comm’n*, 514 U.S. 334, 342 (1995) (“[A]n author’s decision to remain anonymous . . . is an aspect of the freedom of speech protected by the First Amendment”); *Krinsky v. Doe 6*, 159 Cal. App. 4th 1154, 1164-64 (2008) (“Speech on the Internet is . . . accorded First Amendment protection”); *Dendrite Intern., Inc. v. Doe No. 3*, 775 A.2d 756, 760 (N.J. Super. A.D. 2001) (same); *Glassdoor, Inc. v. Superior Court*, 9 Cal. App. 5th 623, 634 (2017) (holding that online provider had standing to assert First Amendment objections to subpoena seeking to unmask anonymous users, and requiring a litigant to demonstrate a *prima facie* cause of action and provide evidence supporting its claim).² If you wish to proceed with your requests, please obtain a court order authorizing the production of basic subscriber information from the New Jersey court, not a California court. *See* Cal. Civ. Proc. Code § 2016.020(b) (“‘Court’ means the trial court in which the action is pending”) *id.* § 2025.210(b); *O’Grady v. Superior Court*, 139 Cal. App. 4th 1423, 1454 (2006) (“Not having yet named any defendant, and a fortiori having served none, [plaintiff] needed leave of court before it could propound discovery to petitioners or anyone else.”) (citing § 2025.210(b)).

Fourth, it is unduly burdensome, duplicative, and improper to require Reddit to appear for a deposition. If you to obtain a court order from a New Jersey court authorizing the production of basic subscriber information as required by the First Amendment, there is no need to depose Reddit. *See American Marriage Ministries v. Google, LLC*, No. 21- mc-80040-SK, 2021 WL 1526757, at *2 (N.D. Cal. Apr. 12, 2021) (“Courts routinely refuse to enforce deposition subpoenas to nonparty service providers where the testimony sought would be

² To the extent you seek information about an anonymous non-party witness, you must establish (1) the subpoena seeking the information was issued in good faith and not for any improper purpose, (2) the information sought relates to a core claim or defense, (3) the identifying information is directly and materially relevant to that claim or defense, and (4) information sufficient to establish or to disprove that claim or defense is unavailable from any other source. *See In re Reddit, Inc.*, 671 F. Supp. 3d 1022, 1025 (N.D. Cal. 2023).

May 4, 2026

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duplicative of records that have already been produced”); *Intermarine, LLC v. Spliethoff Bevrachtungskantoor, B.V.*, 123 F. Supp. 3d 1215, 1218-19 (N.D. Cal. 2015) (quashing a deposition subpoena because service providers “should not bear the burden of providing testimony in all cases in which [an account holder’s documents] are at issue.”).

Fifth, the request for a deposition is also improper because the Subpoena does not identify topics about which you intend to question Reddit’s representative as mandated by California law. *See* Cal. Civ. Proc. Code § 2020.310(e) (“If the deponent is an organization, the subpoena shall describe with reasonable particularity the matters on which examination is requested.”); Cal. Civ. Proc. Code § 2025.230 (“If the deponent named is not a natural person, the deposition notice shall describe with reasonable particularity the matters on which examination is requested.”).

Finally, to the extent you are seeking the names and physical mailing addresses associated with the usernames listed in the Subpoena, this information is beyond the scope of the basic subscriber information that Reddit maintains. *See* Reddit, *Guidelines for Law Enforcement* (last updated Feb. 6, 2026), <https://redditinc.com/policies/guideline-for-law-enforcement> (stating that Reddit’s basic subscriber information records include “the username/subscriber identity, IP logs (including registration IP), email address (if any), phone number (if any), and payment information (if any)”).

I trust that this letter resolves this matter, but please feel free to contact me if you would like to discuss your inquiry further. Reddit does not waive any objections or rights and expressly reserves its right to assert any additional objections.

Sincerely,

A handwritten signature in black ink that reads "Courtney Otto". The signature is written in a cursive, flowing style.

Courtney Otto

EXHIBIT D

r/troubledteens · 3mo ago

[deleted]

Totally random-ish (super limited edition post)

Sorry, this post was deleted by the person who originally posted it.

1

3

Share

Join the conversation

Sort by: Best

Search Comments

Homeless-Sea-Captain · 3mo ago

|| Senior Moderator ||

4:58

BRET

Home > Construction

Construction

Ridge RTC Breaks Ground on New Dormitories as Demand for Youth Mental Health Services Grows

By Boston Real Estate Times · April 3, 2026 57 0



BRET

Boston Real Estate Times

Reader Available

MA Communities Not Ready to

3

Reply

Share

Homeless-Sea-Captain · 3mo ago

|| Senior Moderator ||

Rudy - you also hired the cheapest lawyer in San Francisco to do your dirty work.

3

Reply

Share

Homeless-Sea-Captain · 3mo ago

|| Senior Moderator ||

You'll never find her, BTW 🍷

If you spend the rest of your remaining days, trying to find out where she is, you will never be successful 💕

EXHIBIT D-1



Homeless-Sea-Captain MOD · 2mo ago

|| 🧑 || Senior Moderator ||

NOTE for this sub filled with our BELOVED survivors of the TTI: don't even worry about this post. I didn't read the article - that's not the point - and no one gives two shits what The Ridge (old Ironwood Maine) has to say anyway. 🤔 The point is to send a clear message: we are not scared of the troubled teen industry. At least I'm not.

So bring it, and let the cards fall where they may.

Now. To the person who knows who they are: After you're done typing things up in your gross TTI/recovery BestNotes account, being a royally misogynistic prick while earning CED NATSAP credits - or hitting on women in a red velvet Santa suit at some Paradigm Christmas party - I should thank you for spending the time to compile some of the funniest comments I've ever seen in this sub. Or anywhere, really.

That's all I have to say about this, now or ever, because I am exceedingly preoccupied with everything that is not this. Specifically: laughing while consuming cheesecake with raspberries on top with one of the true gems of human existence - someone I am humbled to call my fellow survivor and a boundless source of light, love, wisdom, and compassion - drinking this beverage (jk-ish - see image), laughing at you and every other asinine TTI fool behind you, and not spending another half second paying attention to your existence on this planet 🌍

Have a terrific weekend, and seriously?

Fuck off, Rudy.



↑ 14 ↓ 💬 Reply 🧡 1 ➦ Share ...

**No-Mind-1431** · 2mo ago

TTI Survivor - Challenger

On that note, have you seen the new documentary The Kids Are Not Alright yet?



10



Reply



Award



Share

**Homeless-Sea-Captain** OP · 2mo ago

|| 🚔 || Senior Moderator ||

YES. I was there w/ you (I spilled a chocolate martini that the TTI Mom bought me basically all over myself and the floor 🤔) 💖💖💖💖💖



6



Reply



Award



Share

**No-Mind-1431** · 2mo ago

TTI Survivor - Challenger

That was such a great day. Spilled martinis or not! And I didn't realize/forgot! My brain is mush. I watched the film again this week. I bought it on YouTube!



3



Reply



Award



Share

**Homeless-Sea-Captain** OP · 2mo ago · Edited 2mo ago

|| 🚔 || Senior Moderator ||

No - believe me I am sitting here in true delight, knowing that you didn't remember who I was for a sec 🤔 it was an incredible day and one that was so emotional and wonderful being able to be at the very first screening is something that I will cherish forever. A couple of months ago I tried to watch it when again Survivors Unrestrained (wonderfully) streamed it, but for some reason it was too hard - idk why. I hope that everyone watches it, though. It is so amazing and I'm fully buying it on every streaming platform. I was totally consumed with something yesterday when you all were posting about it, otherwise I would've been vocally celebrating, btw. I am so thrilled that people will be able to stream this doc in their living rooms and on their phones or wherever to try to understand the devastation that these places cause.

#theyforgotweremembered - I ❤️ that quote so very much.

Note: I'm not sure if I plan on leaving this post up, but I probably will. And if Rudy doesn't get the message by now - my vote is that I advance to the next level and take Rudy on for a fierce public battle of *Table Topics* **HYDE SCHOOL style** 🐒🤔



4



Reply



Award



Share



EXHIBIT E

ETHAN JACOBS (SBN 291838)
 Ethan Jacobs Law Corporation
 ethan@ejacobsllaw.com
 100 Pine Street, Suite 1250
 San Francisco, CA 94111
 Telephone: (415) 275-0845

Attorneys for Petitioners John Doe Nos.
 1, 3, 4, 8, 10 and 11

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO

*In the Matter of the Subpoena Issued to Reddit,
 Inc. in:*

J. DOE #1, J. DOE #3, J. DOE #4, J. DOE # 8, J.
 DOE # 10, and J. DOE #11,

Petitioners,

v.

RUDOLPH NOVAK,

Respondent.

RUDOLPH NOVAK,

Plaintiff,

v.

JULIA QUINONES, et al.,

Defendants.

Case No.: CPF-26-519752

DISCOVERY

**NOTICE OF MOTION OF PETITION TO
 QUASH SUBPOENA UNDER CAL. CIV.
 PROC. 1987.1(A) AND 2029.600**

Date: July 27, 2026

Time: 9:00 a.m.

Department: 302

Judge: Hon. Joseph M. Quinn

Case No.: MRS-L-1804-25

IN THE SUPERIOR COURT OF
 NEW JERSEY, LAW DIVISION
 MORRIS COUNTY

TO ALL PARTIES AND COUNSEL OF RECORD FOR EACH PARTY:

NOTICE IS HEREBY GIVEN that on July 27, 2026, in Department 302 of the above-entitled Court, located at 400 McAllister Street, at the above-indicated date and time, Petitioners John Doe Nos. 1, 3, 4, 8, 10 and 11 hereby move to quash the Subpoena for Production of Business Records in Action Pending Outside California issued by Respondent Rudolph Novak. Pursuant to

1 CCP 1987.2(a) and CCP 1987.2(c), Petitioners are seeking reasonable expenses incurred in making
2 the motion, including reasonable attorneys' fees and costs, in an amount to be determined by the
3 Court.

4 This motion is made on the ground that (a) Respondent has failed to present a *prima facie*
5 claim to overcome Petitioners' First Amendment right to anonymous speech and right to privacy;
6 (b) that the subpoena, if not quashed, violates Petitioners' First Amendment protections for the right
7 to anonymous speech and Petitioners' right of privacy; and (c) an award of attorneys' fees and
8 reasonable costs is mandatory under Cal. Civ. Proc. 1987.2(c).

9 The motion is based on the attached Memorandum of Points and Authorities, the
10 Declaration of Ethan Jacobs, the exhibits thereto, all other papers and pleadings on file with the
11 Court, and such other evidence as may be adduced at or before the hearing.

12
13 Dated: June 17, 2026

Respectfully submitted,

14 ETHAN JACOBS LAW

15
16 By: /s/ Ethan Jacobs

17 Ethan Jacobs
18 Attorneys for Petitioners
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ETHAN JACOBS (SBN 291838)
 Ethan Jacobs Law Corporation
 ethan@ejacobsllaw.com
 100 Pine Street, Suite 1250
 San Francisco, CA 94111
 Telephone: (415) 275-0845

Attorneys for Petitioners John Doe Nos.
 1, 3, 4, 8, 10 and 11

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO

*In the Matter of the Subpoena Issued to Reddit,
 Inc. in:*

J. DOE #1, J. DOE #3, J. DOE #4, J. DOE # 8, J.
 DOE # 10, and J. DOE #11,

Petitioners,

v.

RUDOLPH NOVAK,

Respondent.

RUDOLPH NOVAK,

Plaintiff,

v.

JULIA QUINONES, et al.,

Defendants.

Case No.: CPF-26-519752

DISCOVERY

**PETITION TO QUASH SUBPOENA
 UNDER CAL. CIV. PROC. 1987.1(A) AND
 2029.600**

Date: July 27, 2026

Time: 9:00 a.m.

Department: 302

Judge: Hon. Joseph M. Quinn

Case No.: MRS-L-1804-25

IN THE SUPERIOR COURT OF
 NEW JERSEY, LAW DIVISION
 MORRIS COUNTY

TO ALL PARTIES AND COUNSEL OF RECORD FOR EACH PARTY:

Petitioners John Doe Nos. 1, 3, 4, 8, 10 and 11 will and do hereby move to quash the
 Subpoena for Production of Business Records in Action Pending Outside California issued by
 Respondent Rudolph Novak. Pursuant to CCP 1987.2(a) and CCP 1987.2(c), Petitioners are seeking

1 reasonable expenses incurred in making the motion, including reasonable attorneys' fees and costs,
2 in an amount to be determined by the Court.

3 The Petition is based on the attached Memorandum of Points and Authorities, the
4 Declaration of Ethan Jacobs, the exhibits thereto, all other papers and pleadings on file with the
5 Court, and such other evidence as may be adduced at or before the hearing.

6
7 Dated: June 17, 2026

Respectfully submitted,

8
9 ETHAN JACOBS LAW

10 By: /s/ Ethan Jacobs

11 Ethan Jacobs
12 Attorneys for Petitioners
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1 ETHAN JACOBS (SBN 291838)
Ethan Jacobs Law Corporation
2 ethan@ejacobslaw.com
100 Pine Street, Suite 1250
3 San Francisco, CA 94111
4 Telephone: (415) 275-0845

5 Attorneys for Petitioners John Doe Nos.
1, 3, 4, 8, 10 and 11
6

7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
8 **COUNTY OF SAN FRANCISCO**

9 *In the Matter of the Subpoena Issued to Reddit,*
10 *Inc. in:*

11 J. DOE #1, J. DOE #3, J. DOE #4, J. DOE # 8, J.
DOE # 10, and J. DOE #11,

12 Petitioners,

13 v.
14

15 RUDOLPH NOVAK,

16 Respondent.

17 RUDOLPH NOVAK,

18 Plaintiff,

19 v.

20 JULIA QUINONES, et al.,

21 Defendants.
22
23
24
25
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Case No.: CPF-26-519752

DISCOVERY

**PETITIONERS' MEMORANDUM OF
POINTS AND AUTHORITIES IN
SUPPORT OF PETITION TO QUASH
SUBPOENA UNDER CAL. CIV. PROC.
1987.1(A) AND 2029.600**

Date: July 27, 2026

Time: 9:00 a.m.

Department: 302

Judge: Hon. Joseph M. Quinn

Case No.: MRS-L-1804-25

**IN THE SUPERIOR COURT OF
NEW JERSEY, LAW DIVISION
MORRIS COUNTY**

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<i>Mandel v. UBS/PaineWebber, Inc.</i> (N.J. Super. Ct. App. Div. 2004) 373 N.J. Super. 55	14
<i>Miele v. Rosenblum</i> (N.J. Super. Ct. App. Div. 1991) 254 N.J. Super. 8.....	12
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3 Cal. Const., art. I, § 1 5

I. INTRODUCTION

Respondent Rudolph Novak’s subpoena to Reddit, Inc. to unmask Doe defendants (the “Reddit Subpoena”) and his underlying defamation and false light claims are a groundless attempt to silence anonymous speakers in violation of their First Amendment rights. Novak, a New Jersey attorney proceeding pro se, filed a sprawling 73-page, 61-count complaint against one named defendant and eleven anonymous Reddit and Instagram users. Despite the complaint’s length, it fails to satisfy the most basic pleading requirement for defamation under New Jersey law: it does not identify “by what words” any defendant allegedly defamed Novak. Instead, the complaint offers only vague, conclusory characterizations of Reddit posts without quoting a single word of the allegedly defamatory statements. Under New Jersey’s well-settled pleading rules, such a complaint is fatally defective and must be dismissed. *Zoneraich v. Overlook Hosp.* (N.J. Super. Ct. App. Div. 1986) 212 N.J. Super. 83, 101–102.

Petitioners J. Doe No. 1 (Reddit username “Roald-Dahl”), J. Doe No. 3 (“Dazzling-Sundae907”), J. Doe No. 4 (“the_TTI_mom”), J. Doe No. 8 (“Homeless-Sea-Captain”), J. Doe No. 10 (“Signal-Strain9810”), and J. Doe No. 11 (“marsha-linehan”) (collectively, “Petitioners” or “Does”) are six of the anonymous Reddit users targeted by Novak’s complaint. Together, they are the subject of 43 of the complaint’s 61 counts. Not one of the 42 defamation and false light counts quotes the actual language of the Reddit posts at issue.

California law and the First Amendment protect Petitioners and others like them. When a document subpoena seeks a person’s personally identifying information in connection with an underlying action involving their exercise of free speech rights, they can move to quash under California Civil Procedure Code § 1987.1(b)(5). And where the respondent fails to make a prima facie showing of a cause of action against the petitioner, the petitioner is entitled to a mandatory award of reasonable attorneys’ fees under California Civil Procedure Code § 1987.2(c). For the reasons below, the Court should grant Petitioners’ petition to quash Respondent’s subpoena to

Reddit, Inc. and award Petitioners their reasonable attorneys' fees.

II. FACTUAL BACKGROUND

A. The Underlying New Jersey Action.

Novak is a New Jersey-licensed attorney who describes himself as an advocate for adolescent mental health reform and recovery justice. (Declaration of Ethan Jacobs ("Jacobs Decl.") Ex. A, Compl. ¶ 1.) On August 7, 2025, Novak filed a pro se complaint in New Jersey state court against Julia Quinones and eleven John Doe defendants identified only by their anonymous usernames on the social media platforms Reddit and Instagram. (Jacobs Decl. Ex. A.) The complaint was later administratively dismissed for failure to prosecute. (Jacobs Decl. Ex. B, final two pages.) On April 24, 2026, the New Jersey court granted Novak's unopposed motion to reinstate the complaint. (*Id.*)

The complaint asserts 61 counts: 30 counts of defamation and 30 counts of false light invasion of privacy, each pair based on a separate Reddit or Instagram post, plus one count of tortious interference with prospective economic advantage. (Jacobs Decl. Ex. A.) The complaint alleges that various anonymous users posted statements on Reddit and Instagram accusing Novak of misconduct. (*Id.* ¶ 7.)

B. The Counts Against Petitioners.

The complaint asserts the following counts against the six Petitioners:

Doe No. 1 ("Roald-Dahl") is the subject of 30 counts. The complaint alleges that between August 11, 2024 and March 21, 2025, Doe No. 1 posted comments and threads on Reddit that "alleged" Novak was responsible for, among other things, harassing abuse survivors, being part of a corrupt group, abusing clients, forcing a child to run away from a residential treatment center, engaging in human trafficking and arranging kidnappings, sexual assault, and harassment. (Compl., Counts 3, 4, 9, 10, 15–18, 21, 22, 27–38, 43–50.) None of these counts quotes the actual language of any Reddit post.

Doe No. 3 ("Dazzling-Sundae907") is the subject of two counts. The complaint alleges that on October 22, 2024, Doe No. 3 posted a comment on Reddit that "suggested" Novak was

1 responsible for abusing an adolescent and lying to police and authorities. (Compl., Counts 13 &
2 14.) Neither count quotes the actual language of the post.

3 **J. Doe No. 4 (“the_TTI_mom”)** is the subject of four counts. The complaint alleges that
4 on December 10, 2024 and March 1, 2025, Doe No. 4 posted comments on Reddit “alleging” or
5 “asserting” that Novak was responsible for lying to families, abusing adolescents, violating
6 HIPAA, being a child abuser, and being a stalker. (Compl., Counts 19–20 & 39–40.) None of
7 these counts quotes the actual language of any post.

8 **J. Doe No. 8 (“Homeless-Sea-Captain”)** is the subject of two counts. The complaint
9 alleges that on April 24, 2025, Doe No. 8 posted a thread on Reddit that “alleged that [] Novak
10 was responsible for the death of a parent by ... bullying her, covering it up, and forcing her to
11 commit suicide.” (Compl., Counts 51–52.) Neither count quotes the actual language of the post.

12 **J. Doe No. 10 (“Signal-Strain9810”)** is the subject of two counts. The complaint alleges
13 that on October 27, 2024, Doe No. 10 posted a comment on Reddit “alleging” that Novak is a
14 current top key player in TTI (the “troubled teen industry”) and is responsible for child abuse.
15 (Compl., Counts 55–56.) Neither count quotes the actual language of the post.

16 **J. Doe No. 11 (“marsha-linehan”)** is the subject of two counts. The complaint alleges that
17 on October 27, 2024, Doe No. 11 posted a comment on Reddit “claiming” that Novak has been
18 responsible for human trafficking for decades. (Compl., Counts 57–58.) Neither count quotes the
19 actual language of the post.

20 In every instance, the complaint provides only Novak’s own characterization of what the
21 posts “alleged,” “suggested,” “asserted,” or “claimed.” Not a single count directed at any
22 Petitioner quotes, reproduces, or attaches the actual Reddit post at issue or purports to use the
23 words of the statement. In addition to the counts above, the complaint also asserts a claim against
24 all the defendants for tortious interference with prospective economic advantage. (Compl. Count
25 61.)

26 **C. The Reddit Subpoena.**

27 On April 30, 2026, Novak caused a New Jersey subpoena to be domesticated and served

on Reddit, Inc. in San Francisco, directing Reddit to produce documents sufficient to identify the owners of the Reddit accounts identified in the complaint, including names, email addresses, IP addresses, MAC addresses, IMEI numbers, payment information, and billing addresses. (Jacobs Decl. Ex. B (the “Reddit Subpoena”).) The Reddit Subpoena was returnable on May 27, 2026. (*Id.*) After undersigned counsel requested an extension, counsel for Respondent agreed to extend Reddit’s response date to June 24, 2026. (*Id.* ¶¶ 16–17.)

III. ARGUMENT

A. Petitioners Have Standing to Challenge the Subpoena

Petitioners have standing to bring this petition under CCP 1987.1, subd. (b)(5), because they are persons “whose personally identifying information, as defined in subdivision (b) of Section 1798.79.8 of the Civil Code, is sought in connection with an underlying action involving that person’s exercise of free speech rights.” Civ. Code § 1798.79.8(b)(7)–(8) provides that an “Internet protocol address or host name” and “[a]ny other information . . . that, in combination with any other nonpersonally identifying information, would serve to identify any individual” constitute “personally identifying information.” The Reddit Subpoena seeks precisely this information for Petitioners. All six Petitioners are defendants in the same New Jersey lawsuit, face the same deficient claims, and have a direct interest in the outcome of this petition.

B. The Reddit Subpoena Violates Petitioners’ Free Speech Rights under the First Amendment and the California Constitution.

1. Legal Standard for Overcoming a Speaker’s First Amendment Right to Anonymous Speech.

The Reddit Subpoena, if enforced, would violate Petitioners’ First Amendment right to engage in anonymous online speech. That is because Novak cannot make out a prima facie defamation or false light claim to justify overcoming Petitioners’ right to speak anonymously on Reddit.

The First Amendment of the United States Constitution and the California Constitution protect a person’s decision to speak anonymously. *Krinsky v. Doe 6* (2008) 159 Cal. App. 4th 1154, 1163–64; *ZL Techs., Inc. v. Does 1–7* (2017) 13 Cal. App. 5th 603, 632. *See also* Cal.

1 Const., art. I, § 1. Thus, when a defamation plaintiff seeks disclosure of an online speaker's
 2 identity, a court must balance the speaker's First Amendment rights against the plaintiff's right to
 3 prosecute its case. *ZL Techs.*, 13 Cal. App. 5th at 611–12.

4 A plaintiff seeking compulsory disclosure of an anonymous internet speaker's identity
 5 must state a legally sufficient cause of action and make a prima facie evidentiary showing of the
 6 elements of that cause of action. *ZL Techs.*, 13 Cal. App. 5th at 613. The prima facie showing
 7 requires evidence that supports a ruling for the plaintiff. *Krinsky*, 159 Cal. App. 4th at 1172.

8 As shown below, Novak cannot meet his burden as to any Petitioner.

9 **2. Novak Cannot Meet His Evidentiary Burden to Make Out a Prima**
 10 **Facie Claim of Defamation.**

11 The Court should quash the Reddit Subpoena because Novak cannot meet his evidentiary
 12 burden to make out a prima facie claim of defamation, false light, or tortious interference against
 13 any Petitioner.

14 **a) The Complaint Fails to Identify the Specific Defamatory Words**
 15 **as to Any Petitioner.**

16 The complaint is fatally defective because it does not identify “by what words” any
 17 Petitioner allegedly defamed Novak. Under New Jersey law, which governs the underlying action,
 18 a defamation plaintiff must plead facts sufficient to identify the defamatory words, who wrote or
 19 said them, and the fact of their publication; a vague, conclusory allegation is not enough.
 20 *Zoneraich v. Overlook Hosp.* (N.J. Super. Ct. App. Div. 1986) 212 N.J. Super. 83, 101–102. The
 21 New Jersey Supreme Court has expressly adopted this standard, holding that a plaintiff must plead
 22 facts sufficient to identify the defamer and the circumstances of publication, and that a plaintiff
 23 may bolster a defamation cause of action through discovery but may not file a conclusory
 24 complaint to find out if one exists. *Printing Mart-Morristown v. Sharp Elecs. Corp.* (1989) 116
 25 N.J. 739, 768. *See also Darakjian v. Hanna* (N.J. Super. Ct. App. Div. 2004) 366 N.J. Super. 238,
 26 248–49.

27 Here, the complaint's allegations against each Petitioner are the kind of vague, conclusory
 pleading that New Jersey courts have repeatedly held are insufficient. The deficiency is identical

1 across all the defamation counts directed at Petitioners. Each defamation count alleges only that
 2 the defendant “posted” a comment or thread on Reddit “wherein s/he alleged” or “suggested” or
 3 “asserted” or “claimed” some characterization of misconduct by Novak. For example:

- 4 • Count 3 alleges only that Doe No. 1 “posted a comment on a thread on Reddit
 5 wherein s/he alleged that Mr. Novak was responsible for harassing abuse
 6 survivors.” (Compl., Count 3, ¶ 2.)
- 7 • Count 13 alleges only that Doe No. 3 “posted a comment on a thread on Reddit
 8 wherein s/he suggested that Mr. Novak was responsible for abusing an adolescent
 9 and lying to police and authorities.” (Compl., Count 13, ¶ 2.)
- 10 • Count 19 alleges only that Doe No. 4 “posted a comment on Reddit thread wherein
 11 s/he alleged that Mr. Novak was responsible for lying to families of adolescents,
 12 abusing adolescents, and violating HIPAA.” (Compl., Count 19, ¶ 2.)
- 13 • Count 51 alleges only that Doe No. 8 “posted a thread on Reddit wherein s/he
 14 alleged that Mr. Novak was responsible for the death of a parent by way of bullying
 15 her, covering it up, and forcing her to commit suicide.” (Compl., Count 51, ¶ 1.)
- 16 • Count 55 alleges only that Doe No. 10 “posted a comment on a thread on Reddit
 17 wherein s/he alleged that Mr. Novak is a current top key player in the TTI and is
 18 responsible for child abuse.” (Compl., Count 55, ¶ 2.)
- 19 • Count 57 alleges only that Doe No. 11 “posted a comment on a thread on Reddit
 20 wherein s/he claimed that Mr. Novak has been responsible in human trafficking for
 21 decades.” (Compl., Count 57, ¶ 2.)

22 None of the counts of the complaint quote a single word from any Reddit post. The
 23 complaint does not attach any post as an exhibit. It does not describe the specific language used. It
 24 offers only Novak’s own characterization of what the posts “alleged,” “asserted,” “suggested,” or
 25 “claimed,” without providing the actual words so that a court or a defendant can evaluate whether
 26 the statements are capable of defamatory meaning—or even identify the specific complained-of
 27 statement.

Without the actual words, it is impossible for this Court to perform the threshold judicial function of determining whether the statements are capable of defamatory meaning and whether they constitute protected opinion or rhetorical hyperbole. *See Romaine v. Kallinger* (1988) 109 N.J. 282, 290 (threshold issue is whether statement is reasonably susceptible of defamatory meaning). The *Krinsky* test requires this Court to evaluate the prima facie elements of the underlying claim, including whether the statements are actionable. *Glassdoor, Inc. v. Superior Court* (2017) 9 Cal. App. 5th 623, 635 (plaintiff must first specify the statements claimed to be actionable). That evaluation is impossible when the complaint does not disclose what was said.

b) Even If the Court Could Evaluate the Statements, the Complaint's Own Characterizations Demonstrate That the Alleged Posts Are Non-Actionable Opinion or Rhetorical Hyperbole.

As shown in the preceding section, the complaint's failure to plead the specific defamatory words is fatal to Respondent's claims. But even if the Court were to evaluate the statements based on the complaint's own characterizations, those characterizations strongly suggest that the alleged posts are non-actionable opinion or rhetorical hyperbole, not provably false assertions of fact.

Under New Jersey law, the distinction between actionable fact and non-actionable opinion is governed by a three-part test examining the content, verifiability, and context of the challenged statements. *Ward v. Zelikovsky* (1994) 136 N.J. 516, 529. Courts must determine whether the statements suggest specific factual assertions capable of being proven true or false, or whether they instead constitute loose, figurative, or hyperbolic language that is not likely to imply specific facts. *Id.* at 531–32. Critically, if a statement could be construed as either fact or opinion, a defendant should not be held liable, because an interpretation favoring a finding of fact would impose a chilling effect on speech. *Lynch v. New Jersey Educ. Ass'n* (1999) 161 N.J. 152, 167–68.

California courts apply a similar totality of the circumstances analysis, examining the content, language, tone, and context of the challenged statements, including the nature of the forum in which they were made. *ZL Techs.*, 13 Cal. App. 5th at 624–25. Courts consider “the nature and full content of the particular communication, as well as the knowledge and understanding of the audience targeted by the publication,” including “whether the statements

1 were posted anonymously on an Internet website, as the culture of most electronic bulletin boards
2 encourages discussion participants to play fast and loose with facts, and the use of anonymity or
3 pseudonyms, is a cue to discount the authors' statements accordingly." *Id.* at 625 [cleaned up].

4 Here, three features of the complaint's own allegations indicate that the Reddit posts at
5 issue are non-actionable.

6 First, the context of the speech strongly favors protection. The posts were made
7 anonymously on Reddit, a platform whose culture of informal, pseudonymous commentary is well
8 recognized. The posts appeared on subreddits dedicated to discussion of the "troubled teen
9 industry," a topic of intense public debate. Readers of such forums expect to encounter strongly
10 worded opinions, personal experiences, and heated rhetoric, not verified factual reporting. This
11 context is a powerful signal that the statements should be understood as opinion. *See Ward*, 136
12 N.J. at 532–33 [context affects the fair and natural meaning of a statement, and a reasonable
13 listener "naturally discounts to some degree statements made in the heat of vitriolic battle"].

14 Second, the content of the statements, as characterized by the complaint itself, consists of
15 broad, generalized accusations lacking the specificity required for actionable defamation. The
16 complaint alleges that various Petitioners "alleged," "suggested," "asserted," or "claimed" that
17 Novak was "responsible for" various categories of misconduct. (Compl., *passim*.) These are broad
18 characterizations, not specific factual assertions. Under *Ward*, generalized accusations are the
19 hallmark of non-actionable opinion. 136 N.J. at 529–30.

20 Third, the verifiability of the statements is impossible to assess because the complaint does
21 not disclose what was actually said. The complaint provides only Novak's characterization of the
22 posts' meaning. Without the actual words, the Court cannot determine whether the statements
23 assert provably false facts or instead consist of the kind of loose, figurative, or hyperbolic
24 language that New Jersey and California courts have consistently held to be non-actionable. *See*
25 *Lynch*, 161 N.J. at 167–68. For example, a Reddit post stating that someone is "responsible for"
26 abuse could mean anything from a specific factual accusation to a broad expression of opinion
27 about systemic failures in the troubled teen industry. Asserting that someone is "responsible for"

1 something is inherently a matter of opinion because it expresses a conclusion about causation and
 2 blame. The complaint's refusal to quote the actual language makes it impossible to determine
 3 which interpretation applies, and if a statement could be construed as either fact or opinion, a
 4 defendant should not be held liable. *Lynch*, 161 N.J. at 168.

5 The complaint's characterizations are thus doubly deficient: they fail to plead the specific
 6 defamatory words as required by *Zoneraich*, and even taken at face value, they describe the kind
 7 of generalized, opinion-laden commentary are non-actionable. This Court need not, and should
 8 not, compel the unmasking of anonymous speakers based on allegations that, even if credited,
 9 describe protected speech.

10 **c) Novak Is a Limited-Purpose Public Figure Who Must Plead**
 11 **Actual Malice, and the Complaint's Conclusory Allegations of Fault**
 12 **Are Insufficient.**

13 Even if the complaint's defamation counts could survive the pleading deficiencies
 14 identified above, they would still fail because Novak is a limited-purpose public figure who must
 15 plead and prove actual malice, and the complaint does not do so.

16 Under New Jersey law, the "actual malice" standard applies when the alleged defamatory
 17 statement concerns a public figure, a public official, or involves a matter of public concern. *Senna*
 18 *v. Florimont* (2008) 196 N.J. 469, 496. A limited-purpose public figure is one who has (1)
 19 voluntarily injected himself into a public controversy, (2) the controversy is a public one, (3) by
 20 virtue of the public controversy, the individual became a public figure for a limited range of
 21 issues, and (4) the person assumed special prominence in the resolution of the public question. *Hill*
 22 *v. Evening News Co.* (N.J. Super. Ct. App. Div. 1998) 314 N.J. Super. 545, 554. *See also*
 23 *Lawrence v. Bauer Publ'g & Printing Ltd.* (1982) 89 N.J. 451, 463–65 [finding that an individual
 24 who led a petition drive, spoke at public meetings, and had access to the media was a limited-
 25 purpose public figure].

26 Novak satisfies every element of this test based on the allegations of his complaint.

27 First, Novak voluntarily injected himself into the public controversy surrounding the
 troubled teen industry. His complaint describes him as "a nationally recognized advocate for

1 adolescent mental health reform, recovery justice, and family systems support.” (Compl. ¶ 1.) He
 2 alleges that he has served in “a variety of leadership and consulting roles” in the behavioral health
 3 industry, including “program development, business operations, marketing and outreach strategy,
 4 and parent-family engagement for adolescent and young adult behavioral health programs.”
 5 (Compl. ¶ 3.) He alleges that he has been “featured in numerous professional spotlights
 6 highlighting his contributions to youth mental health, family systems work, and recovery-focused
 7 programming.” (Compl. ¶ 4.) And he alleges that he has “supported peer training initiatives
 8 through MyHelpConnect,” a national resource platform. (Compl. ¶ 5.) These are not the activities
 9 of a private individual who has been involuntarily drawn into a controversy. They are the activities
 10 of a person who has deliberately involved himself in a public issue. *See MacKay v. CSK Publ’g*
 11 *Co.* (N.J. Super. Ct. App. Div. 1997) 300 N.J. Super. 599, 614 [plaintiff who published articles
 12 and urged solutions to industry problems was a limited-purpose public figure because he had
 13 “thrust[] himself into the vortex of the debate”].

14 Second, the troubled teen industry is a matter of significant public concern. The
 15 institutional treatment of adolescents, the ethics of residential treatment centers, and the
 16 accountability of professionals who work within these systems are topics that directly implicate
 17 public health and safety. *See W.J.A. v. D.A.* (2012) 210 N.J. 229, 243 [“business activities
 18 affecting public health and safety or those industries that are heavily regulated by the government
 19 ‘intrinsically implicate[] important public interests’”] [citation omitted].

20 Third, Novak became a public figure for the limited range of issues relating to the troubled
 21 teen industry and adolescent mental health reform, the very topics addressed by the Reddit posts at
 22 issue.

23 Fourth, Novak assumed special prominence in the resolution of these public questions. He
 24 describes himself as “nationally recognized” and alleges extensive involvement in clinical
 25 trainings, institutional audits, and educational panels. (Compl. ¶¶ 1, 4, 6.) He alleges that he
 26 “frequently educates families about their rights” and has “participated in clinical and institutional
 27 trainings aimed at exposing and eliminating systemic abuse.” (Compl. ¶ 6.)

1 Because Novak is a limited-purpose public figure on TTI-related topics, he must prove
2 actual malice, that is, that each Petitioner published the allegedly defamatory statements with
3 knowledge of their falsity or reckless disregard of whether they were true or false. *Lawrence*, 89
4 N.J. at 466. And actual malice must be pleaded. *See, e.g., Darakjian v. Hanna*, 366 N.J. Super. at
5 246 [reversing denial of motion to dismiss where complaint failed to plead facts supporting actual
6 malice].

7 The complaint does not come close to meeting this standard. Each count recites the same
8 boilerplate formula: that the defendant “either knew the statement was false, or s/he acted in
9 reckless disregard as to its falsity, or she negligently published the false statement.” (*See, e.g.,*
10 *Compl.*, Count 51, ¶ 2.) This is precisely the kind of bare conclusory assertion that New Jersey
11 courts have held insufficient. *Darakjian*, 366 N.J. Super. at 248 [bare conclusory assertion that
12 defendants “knew and/or reasonably should have known” the statement was false, “with no other
13 factual reference to lend support to the contention,” is insufficient]. The complaint does not allege
14 a single fact suggesting that any Petitioner knew the statements were false or entertained serious
15 doubts about their truth. It does not allege any prior relationship between any Petitioner and
16 Novak. It does not allege that any Petitioner had access to information contradicting the posts. It
17 alleges only a legal conclusion.

18 Moreover, even if Novak were not a limited-purpose public figure, the actual malice
19 standard would still apply because the Reddit posts concern a matter of public concern. Under
20 New Jersey law, the actual malice standard applies to all defamation claims involving matters of
21 public concern, regardless of the plaintiff’s status. *Senna*, 196 N.J. at 496–97. The Reddit posts
22 alleged in the complaint address the conduct of a professional who works with vulnerable
23 adolescents in the treatment and recovery industries, a topic that directly implicates public health
24 and safety. *W.J.A. v. D.A.*, 210 N.J. at 243. The troubled teen industry has been the subject of
25 extensive public debate, legislative scrutiny, and media coverage. Anonymous commentary on
26 Reddit about the conduct of professionals in this industry is speech on a matter of public concern
27 that triggers the actual malice standard.

1 Because Novak cannot satisfy the actual malice standard with the conclusory allegations in
 2 his complaint, he cannot make the prima facie showing required under *Krinsky* and *ZL*
 3 *Technologies* to overcome Petitioners' First Amendment right to anonymous speech.

4
 5 **d) The Complaint's Conclusory Allegations of Fault Are Insufficient.**

6 Beyond the failure to plead the specific defamatory words, the complaint's allegations of
 7 fault are conclusory. Each count recites the same boilerplate formula: that the defendant "either
 8 knew the statement was false, or s/he acted in reckless disregard as to its falsity, or she negligently
 9 published the false statement." (*See, e.g.*, Compl., Count 51, ¶ 2.) These are bare legal conclusions
 10 unsupported by any factual allegations. Under *Zoneraich* and *Printing Mart*, this kind of
 11 conclusory allegation is insufficient to state a claim for defamation. *Darakjian*, 366 N.J. Super. at
 12 250 (a single conclusory assertion that defendants "knew and/or reasonably should have known"
 13 the statement was false did not pass muster).

14 **3. The False Light Claims Fail for the Same Reasons.**

15 Novak's false light claims are deficient for the same reason. Under New Jersey law, a false
 16 light claim requires proof that (1) the false light in which the plaintiff was placed would be highly
 17 offensive to a reasonable person, and (2) the defendant had knowledge of or acted in reckless
 18 disregard as to the falsity of the publicized matter and the false light in which the plaintiff would
 19 be placed. *Romaine v. Kallinger* (1988) 109 N.J. 282, 293–294. As with defamation, a
 20 fundamental requirement of the false light tort is that the disputed publicity be false. *Romaine*, 109
 21 N.J. at 294. And as with defamation claims, the court must determine whether the allegedly
 22 defamatory statement is capable of the meaning assigned to it by the plaintiff. *Id.* at 295.

23 New Jersey courts apply specificity requirements to false light claims that are grounded in
 24 allegedly defamatory publications. In *Miele v. Rosenblum*, the Appellate Division applied the
 25 defamation standard to a false light claim by examining the specific words of the publications at
 26 issue. (N.J. Super. Ct. App. Div. 1991) 254 N.J. Super. 8, 14–15. Because Novak's false light
 27 claims are derivative of his defamation claims, incorporating each defamation count by reference,

they necessarily fail for the same reason: the complaint does not identify the specific false statements that allegedly placed Novak in a false light.

4. The Tortious Interference Claim Is Derivative of the Defamation Claims and Independently Fails for Lack of Specificity.

Count 61 of the complaint asserts tortious interference with prospective economic advantage against all defendants, including all six Petitioners. (Jacobs Decl. Ex. A at 72.) This count fails because (1) it is derivative of the defective defamation claims, and (2) it fails to plead the required elements with sufficient specificity.

a) The Tortious Interference Claim Is “Completely Comprehended” by the Defamation Claims and Must Fall with Them.

Under New Jersey law, when a tortious interference claim is predicated on the same conduct as a defamation claim, the defamation cause of action “completely comprehends” the tortious interference claim. *BrainBuilders, LLC v. Optum, Inc.* (N.J. Super. Ct. App. Div., Apr. 19, 2024, No. A-0621-22) 2024 WL 1693717, at *7 [quoting *LoBiondo v. Schwartz* (N.J. Super Ct. App. Div. 1999) 323 N.J. Super. 391, 417]. A plaintiff “who claims that its reputation has been damaged by a false statement cannot circumvent the strictures of the law of defamation . . . by labeling its action as one for” another tort. *Id.* [citation omitted]. Where defamation claims are properly dismissed, a tortious interference claim “based entirely on the alleged defamation” must also fail. *2820 Mt. Ephraim Avenue, LLC v. Brown* (N.J. Super. Ct. App. Div., July 13, 2021, No. A-2694-19) 2021 WL 2934611, at *3.

Here, the Count Sixty-One does not allege any wrongful conduct independent of the Reddit posts underlying the defamation and false light counts. The count incorporates all prior allegations by reference, alleges that defendants “interfered with Plaintiff’s pursuit of economic advantage,” and that they did so “without justification and otherwise with malice.” (Compl., Count 61, ¶¶ 3–5.) Thus, the alleged conduct that forms basis for the interference claim is the same anonymous Reddit posts that form the basis of the 60 preceding counts. Because those defamation and false light counts are fatally defective under *Zoneraich* for failure to plead the specific defamatory words, the tortious interference claim, which is “completely comprehended” by the

1 defamation claims, necessarily fails with them.

2 **b) The Tortious Interference Claim Independently Fails to Identify**
 3 **Any Specific Prospective Business Relationship.**

4 Even if the defamation claims were viable, the tortious interference count still fails because
 5 it does not identify a single specific prospective business relationship that was allegedly interfered
 6 with.

7 A tortious interference complaint must allege facts showing “some protectable right—a
 8 prospective economic or contractual relationship” with “allegations of fact giving rise to some
 9 ‘reasonable expectation of economic advantage.’” *Printing Mart-Morristown v. Sharp Elecs.*
 10 *Corp.* (1989) 116 N.J. 739, 751 [citation omitted]. The complaint must also allege facts showing
 11 causation—that absent the interference, “there was a reasonable probability that the victim of the
 12 interference would have received the anticipated economic benefits.” *Id.*

13 Count 61 satisfies none of these requirements. It alleges only that Novak “has a legally
 14 protected interest in carrying on his aforementioned profession,” that he “pursues his legally
 15 protected interest for actual and prospective economic advantage,” and that defendants’ “tortious
 16 interference caused the loss of [his] actual and prospective economic gain.” (Compl., Count 61, ¶¶
 17 2, 3, 5.) The complaint does not name a single client, employer, referral source, or other business
 18 opportunity that was lost. It does not identify any specific prospective business relationship with
 19 which any Petitioner allegedly interfered. It does not allege that any particular person or entity saw
 20 any particular Reddit post and declined to do business with Novak as a result.

21 Failure to “identify even a single client” with whom defendants interfered is fatal to a
 22 tortious interference claim. *Mandel v. UBS/PaineWebber, Inc.* (N.J. Super. Ct. App. Div. 2004)
 23 373 N.J. Super. 55, 81. Likewise, references to unspecified business relationships are “simply
 24 vague conclusory statements offered to hint at a possible cause of action” and are insufficient. *I*
 25 *Reliable Transportation, Inc. v. Trader Joe’s Co., Inc.* (N.J. Super. Ct. App. Div., July 27, 2020,
 26 No. A-4312-18T1) 2020 WL 4279789, at *6. The generic allegation that Novak has a “legally
 27 protected interest in carrying on his aforementioned profession” is precisely the type of conclusory
 pleading that New Jersey courts have repeatedly rejected.

1 Because the tortious interference claim is both derivative of the failed defamation claims
2 and independently insufficient, it cannot support a prima facie showing under *Krinsky* and *ZL*
3 *Technologies*.

4 **C. Petitioners Are Entitled to Fees and Costs.**

5 Civ. Proc. § 1987.2(c) provides for a mandatory award of attorneys’ fees and costs for a
6 party whose motion to quash under Civ. Proc. § 1987.1 is granted if: (1) the subpoena requests
7 personally identifying information as defined by Civ. Code § 1798.79.8; (2) for use in an action
8 pending in another state; (3) the subpoena has been served on any Internet service provider or
9 provider of any other interactive computer service as defined in 47 U.S.C § 230(f)(2); (4) the
10 underlying action arises from the moving party’s exercise of free speech rights; and (5) the
11 respondent has failed to make a prima facie showing of a cause of action. *Roe v. Halbig* (2018) 29
12 Cal. App. 5th 286, 299.

13 These requirements are met here. The Reddit Subpoena seeks the name, IP addresses,
14 email addresses, phone numbers, MAC addresses, IMEI numbers, payment information, and
15 billing addresses of Petitioners in connection with a lawsuit in New Jersey. (Jacobs Decl. Ex. B.)
16 As noted above in Section III(A), Cal. Civ. Code §§ 1798.79.8(b)(7)-(8) provide that IP addresses
17 and “[a]ny [] information . . . that . . . would serve to identify any individual” constitute
18 “personally identifying information.” Further, the Reddit Subpoena has been served on Reddit,
19 Inc., on whose website users can interface with one another by posting content and commenting
20 on the same. (Jacobs Decl. Ex. B; *see also In re DMCA Subpoena to Reddit, Inc.*, 383 F. Supp. 3d
21 900, 906 (N.D. Cal. 2019).) As an information content provider, Reddit falls within the expansive
22 definition of an “Interactive Computer Service” set forth in 47 U.S.C. § 230(f)(2) (“The term
23 ‘interactive computer service’ means any information service ... that provides or enables computer
24 access by multiple users to a computer server”).

25 As the Court of Appeal explained in *Roe v. Halbig*, the legislative history of section
26 1987.2(c) highlights the Legislature’s focus on the burden on free speech posed by subpoenas
27 derived from out-of-state cases targeting anonymous speakers on the Internet. 29 Cal. App. 5th at

1 303. The fee-shifting provision was designed to allow those whose information is being sought to
2 recover their costs and attorneys' fees in resisting abusive subpoenas, and to create a disincentive
3 for seeking such subpoenas in California in the first place. *Id.* at 302.

4 Petitioners will include their calculation of fees and costs with their reply brief.

5 **IV. CONCLUSION**

6 For the reasons above, Petitioners respectfully request that the Court quash the Reddit
7 Subpoena and grant them their reasonable fees and costs incurred in preparing of this motion.

8
9 Dated: June 17, 2026

Respectfully submitted,

10 ETHAN JACOBS LAW CORPORATION
11

12 By: /s/ Ethan Jacobs
13 Ethan Jacobs
14 Attorneys for Petitioners
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Rudolph Novak (#003582010)
5 Ridgewood Drive
Randolph, NJ 07869
Phone: 856-906-2980
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Pro Se Plaintiff

RUDOLPH NOVAK, : SUPERIOR COURT OF NEW JERSEY
: LAW DIVISION-CIVIL PART
Plaintiff, : MORRIS COUNTY
: DOCKET NO. MRS-L-1804-25
V. :
: Civil Action
JULIA QUINONES :
(A.K.A. :
"Glad-Cheesecake2959" :
and "codeadampodcast"), :
J. DOE #1 : **FIRST AMENDED COMPLAINT**
("Roald-Dahl"), :
J. DOE #2 :
("pinktiger32"), :
J. DOE #4 :
("the_TTI_mom"), :
J. DOE #8 :
("Homeless-Sea-Captain"), :
J. DOE #9 :
("rjm2013"), :
J. DOE #11 ("marsha- :
linehan"), :
J. DOE #12 - #20 :
(other fictitiously- :
designated persons), :
:
Defendants. :

Plaintiff, Rudolph Novak (5 Ridgewood Drive, Randolph (Morris County), New Jersey), proceeding pro se, states the following by way of complaint against the above-named defendants:

OVERVIEW

1. Plaintiff Rudolph Novak is a licensed attorney in the State of New Jersey (Bar No. 003582010). He earned his Juris Doctor from Rutgers School of Law and holds a Bachelor of Science in Business Administration from Montclair State University. Plaintiff has worked in behavioral healthcare, treatment-program consulting, family advocacy, business development, and related professional fields. Plaintiff has completed all coursework and degree requirements for a Master of Arts in Marriage and Family Therapy at Touro University Worldwide and is awaiting conferral of the degree.

2. Throughout his professional career, Plaintiff has worked with treatment providers, families, clinicians, educational consultants, attorneys, and other professionals involved in adolescent and young-adult behavioral healthcare. Plaintiff has developed and maintained professional relationships throughout the behavioral-healthcare and treatment industries.

3. Plaintiff has served in leadership, consulting, outreach, and business-development roles for behavioral-healthcare organizations and treatment

providers. His work has included program development, family support, professional education, referral relations, and treatment-industry consulting.

4. Plaintiff has cultivated a professional reputation for ethical advocacy, family support, treatment-program development, and behavioral-healthcare consulting. His reputation, credibility, licensure, and professional standing are important components of his livelihood and professional success.

5. Beginning in or about 2024, Defendants engaged in a sustained course of online publications concerning Plaintiff through Reddit, Instagram, and related social-media platforms. Defendants' course of conduct included specific posts that falsely accuse Plaintiff of serious crimes and professional misconduct, as detailed in the counts below.

6. Through those publications, Defendants repeatedly accused Plaintiff, expressly or by implication, of criminal conduct, child abuse, sexual misconduct, HIPAA violations, human trafficking, wrongful death, kidnapping, professional misconduct, fraudulent credentials, and other conduct incompatible with Plaintiff's profession and reputation. Many of these false allegations impute serious criminal offenses under New Jersey and/or federal law, and all of them are defamatory per se — both as accusations of crime and as statements injurious to Plaintiff in his profession. Plaintiff recognizes that some online commentary about him consists of name-calling and subjective opinion, and

does not seek liability for such rhetoric. The claims here are based on specific, factual accusations of criminal and professional misconduct — such as human trafficking, kidnapping, bullying a parent into suicide, HIPAA violations, and efforts to cover up incidents — that are capable of being proven true or false. To be clear, Plaintiff does not seek to impose liability for generalized expressions of dislike, crude insults, or aesthetic judgments (e.g., calling him “cringe,” a “man-baby,” or criticizing his appearance). The claims are limited to statements that falsely assert specific criminal or professional misconduct.

7. The statements described herein were false and were published without factual basis.

8. Defendants’ publications were not isolated. They were made in a subreddit community in which Defendants repeatedly referenced Plaintiff by name, republished links to prior posts, tagged or invoked other users, encouraged additional investigation of Plaintiff, and repeated the same specific accusations of abuse, trafficking, kidnapping, HIPAA violations, suicide and cover-up, and professional unfitness, as detailed in the counts below.

9. Because Defendants repeatedly identified Plaintiff by name, photograph, username, professional role, prior employment, current employment, and treatment-industry affiliations, readers understood the statements to refer to Plaintiff personally and professionally.

10. As a direct and proximate result of Defendants' publications, Plaintiff has suffered reputational injury, emotional distress, humiliation, interference with professional relationships, interference with prospective business opportunities, and other damages.

FACTS ESTABLISHING ACTUAL MALICE

11. Other than a single unsolicited Instagram direct message that Defendant Quinones sent Plaintiff on July 9, 2024 (Exhibit A-1), which Plaintiff did not answer, Plaintiff has never met, spoken with, corresponded with, or had any relationship, dealing, or interaction of any kind with any Defendant. No Defendant has ever had any personal knowledge of Plaintiff, his conduct, his employment, or the facts each Defendant purported to assert about him.

12. Each Defendant published the statements described herein as an anonymous stranger to Plaintiff, with no source of information, no investigation, and no factual basis for the specific accusations made — including accusations of human trafficking, kidnapping, child abuse, sexual misconduct, HIPAA violations, and causing a death.

13. Because each Defendant fabricated specific, verifiable accusations of criminal and professional misconduct concerning a person the Defendant did not know and had no basis to write about, each Defendant published with knowledge

that the statements were false, or with reckless disregard for and purposeful avoidance of the truth.

14. The falsity was further apparent from each Defendant's own words and conduct, and from the coordinated, repeated, and republished nature of the campaign alleged above. By way of example:

(a) Defendant marsha-linehan expressly acknowledges in her post that "If I'm wrong, I'm wrong, but it's better to warn people about Rudy Novak and be wrong..." while simultaneously accusing Plaintiff of "mass destruction of human beings" and "human trafficking" over "decades." Publishing criminal accusations while admitting the possibility of falsity reflects reckless disregard for truth.

(b) Defendant Roald-Dahl previously posted Plaintiff's Turnbridge employment dates and knew Plaintiff had left Turnbridge more than a year before the December 2024 runaway incident. Nevertheless, Roald-Dahl used that incident to portray Turnbridge as "fraudulent," "HORRIBLY ABUSIVE," and as having "tried to cover this up," and urged parents to "DO believe Reddit" instead of any contrary information. This deliberate use of an unrelated event to advance a narrative of abuse and cover-up shows reckless disregard.

(c) Defendant Homeless-Sea-Captain narrates a specific story that Plaintiff and Ironwood "bullied" a mother so badly it "drove her to take her own

life” and “tried to cover it up” by closing the program, without any personal connection to Plaintiff and without citing any source supporting that causation. The specificity of the narrative, combined with the lack of factual basis, supports an inference of fabrication and reckless disregard.

(d) Defendant the_TTI_mom describes “so many HIPPA violations” and claims “every SINGLE parent” she spoke to was lied to, manipulated, and abused, yet provides no dates, names, or incidents and speaks from an anonymous Reddit account, not from documented experience with Plaintiff’s conduct. The sweeping nature of these accusations, tied directly to Plaintiff by name, supports an inference of reckless disregard.

THE DEFENDANTS

15. Defendant Julia Quinones is an individual who operates and/or uses social-media accounts including "codeadampodcast" on Instagram and "Glad-Cheesecake2959" on Reddit.

16. J. Doe #1 posts on Reddit using the username "Roald-Dahl."

17. J. Doe #2 posts on Reddit using the username "pinktiger32."

18. J. Doe #4 posts on Reddit using the username "the_TTI_mom."

19. J. Doe #8 posts on Reddit using the username "Homeless-Sea-Captain."

20. J. Doe #9 posts on Reddit using the username "rjm2013."

21. J. Doe #11 posts on Reddit using the username "marsha-linehan."

22. J. Does #12-#20 are persons whose identities are not presently known to Plaintiff and who participated in, republished, amplified, coordinated, or otherwise contributed to the defamatory publications described herein.

23. Each Defendant intentionally directed the publications described herein at the State of New Jersey, knowing that Plaintiff is an attorney licensed in and a resident of New Jersey whose professional reputation and practice are centered in New Jersey, and intending that the resulting harm would be suffered by Plaintiff in New Jersey. This Court accordingly has personal jurisdiction over each Defendant, and venue is properly laid in Morris County, where Plaintiff resides and where he sustained the injury alleged.

FIRST COUNT

1. Plaintiff repeats and realleges the preceding paragraphs as though fully set forth herein.

2. On or about July 24, 2023, Plaintiff was hired as a Vice-President of Altior Healthcare, LLC, which has treatment centers in several states, including Maine.

3. Prior to Plaintiff's employment, Altior Healthcare, LLC had purchased a long-term residential program for adolescents in Maine named "Ironwood".

4. To meet increasing demand for short-term, sub-acute residential treatment for adolescents, this program continued to operate and, on or about June of 2024, was restructured and rebranded as a short-term sub-acute residential treatment center, "Ridge RTC," including changes to its operational structure, business model, and client population. The program was not closed or shut down.

5. On August 9, 2024, JULIA QUINONES / CODE ADAM PODCAST, using Instagram, published a collage about Plaintiff, including his name, photographs, professional role, employment history, treatment-industry affiliations and his Instagram "tags" @rudynovakofficial and @ridgertc (i.e., Ridge RTC, the Maine Altior Healthcare facility). A printout of this publication is appended hereto as Exhibit A-2.

6. Underneath the tags "@rudynovakofficial" and "@ridgertc," Julia Quinones added hashtags including "#abuse," "#neglect," and "#allegations." The implication was that Plaintiff was the subject of abuse or neglect allegations in connection with his work in the treatment industry. The statements were false; no client, patient, family member of a client, employer, colleague, regulator, or licensing authority has ever made or sustained any allegation that Plaintiff abused or neglected a client or patient or violated patient privacy.

7. Underneath the reference to Plaintiff's 2015-2023 employment as Director of Outreach at the Connecticut treatment facility known as Turnbridge (and a photo of Plaintiff wearing a Turnbridge t-shirt), Quinones's post included statements attributed to others:

There are so many HIPPA [sic] violations going on in that place it's frightening!

[the_TTI_mom]

I think a better question is "who else was sexually assaulted at Turnbridge??"

[pinktiger32]

The insinuation was that, while Plaintiff was Director of Outreach at Turnbridge, he allowed HIPAA violations and a sexual assault to occur at that facility. The statements are false. Plaintiff has never been involved with or aware of any HIPAA violation or sexual assault at Turnbridge or any other program; he has never been accused by any regulator, employer, or licensing authority of any HIPAA violation; and he has never been accused, investigated, or charged with any sexual assault, or with allowing any sexual assault to occur, at Turnbridge or any program with which he has worked.

8. The aforementioned August 9, 2024 Instagram post thus communicated the false message that Plaintiff does not protect clients' privacy or physical safety at the facilities where he works.

9. The publication was not privileged and it was communicated to third persons via Instagram. Actual and prospective clients (and persons who refer individuals to treatment facilities) using the Internet to research Plaintiff and facilities affiliated with him were exposed to this post. To the extent the publication might otherwise have been privileged, the privilege was abused by publishing same to anyone using Instagram.

10. Julia Quinones negligently failed to ascertain the falsity of the publication before posting it.

11. Plaintiff has reason to believe that Julia Quinones posted the false statements knowing that they were false and with reckless disregard as to truth or falsity.

(a) One month before that publication, and on July 9, 2024, Julia Quinones used Instagram to contact Plaintiff directly:

Hey Rudy. My name is Julia Quinones. I saw you checking out the account, and I understand it might seem concerning from an outside perspective. However, I would like to express that I have no intention or interest in creating any controversy for RIDGE Maine. My intentions are always to educate and prevent abuse. To give survivors of Ironwood Maine a voice, and to validate the parents, staff, and residents who experienced ironwood Maine at the hands of the previous owners. Good luck with the rebranding . I truly hope to see big change and would love to answer any questions you might have. - ironwood Maine survivor 2012.

Exhibit A-1.

(b) It is clear from this communication that Julia Quinones neither knew nor believed that Plaintiff had ever engaged in abuse or neglect or allowed HIPAA violations or sexual assault.

(c) By "Ironwood Maine," Julia Quinones was referring to a former treatment facility that had at one time operated at the site that Ridge RTC now operates.

(d) Plaintiff has never had any knowledge of, has never been accused of, involved with, or anything to do with any allegation of abuse or misconduct of any sort at Ironwood Maine, as Julia Quinones acknowledges. It is clear from Exhibit A-1 that Julia Quinones did not have any reason to believe that Plaintiff had anything to do with abuse, neglect, HIPAA violations or a sexual assault.

(e) Yet, a month after telling Plaintiff "Good luck with the rebranding . I truly hope to see big change," Julia Quinones was posting on Instagram that Plaintiff had something to do with abuse, neglect, HIPAA violations and a sexual assault. She knew she had no evidence to support her claims and was recklessly, willfully and wantonly indifferent as to whether they were false.

(f) See also Facts Establishing Actual Malice (paragraphs 11-14 above).

12. As a direct and proximate result of the publication, Plaintiff sustained damage to his reputation, professional standing, economic opportunities, and personal well-being.

13. Julia Quinones deliberately exposed Plaintiff to public contempt and ridicule via her Instagram post, for the purpose of interfering with his livelihood.

WHEREFORE, Plaintiff demands judgment against Julia Quinones for compensatory damages, punitive damages, prejudgment interest, costs of suit, and such other relief as the Court deems just and proper.

SECOND COUNT

1. The foregoing is incorporated by reference.

2. By reason of the publication identified in the First Count, Ms. Quinones placed Plaintiff in a false light which would be highly offensive to a reasonable person, and was in fact highly offensive to the Plaintiff.

3. Ms. Quinones knew the falsity of the publicized matter and the false light in which Plaintiff would be placed.

4. Ms. Quinones acted in reckless disregard as to the falsity of the publicized matter and the false light in which Plaintiff would be placed. See Facts Establishing Actual Malice (paragraphs 11-14 above).

5. As a direct and proximate result of the foregoing, Plaintiff sustained substantial damages.

6. Ms. Quinones acted intentionally and/or recklessly and/or for the purpose of injuring Plaintiff's reputation and causing him damages, in reckless and/or wanton disregard for Plaintiff's rights.

WHEREFORE, Plaintiff demands judgment against Julia Quinones for compensatory damages, punitive damages, prejudgment interest, costs of suit, and such other relief as the Court deems just and proper.

THIRD COUNT

1. The foregoing is incorporated by reference.

2. Between August 9 and August 10 of 2024, Julia Quinones used Reddit to post "Introducing Rudy Novak"; the printout is appended hereto as Exhibit A-3.

3. This post repeats much of the same content as the Instagram post, including the collage displaying Plaintiff's name, photograph, professional role, and employment history. In the body of the post, Julia Quinones (GLAD-CHEESECAKE2959) addressed Plaintiff by name:

Rudy, If you're reading this, I want to bring to your attention the serious issue of abuse that survivors have faced. . . . How will Altior Healthcare ensure that abuse and neglect are prevented in the future?

4. Besides repeating the defamation mentioned in the First Count, the post is titled "Introducing Rudy Novak" and was published in the r/troubledteens community, which is dedicated to opposing alleged abuse in the troubled-teen treatment industry. By placing Plaintiff's name, photograph, and professional role in that community and framing him as the person who must answer for "the serious issue of abuse" and ensure that "abuse and neglect are prevented," the post conveys the false implication that Plaintiff is professionally associated with, or complicit in, the abuse and neglect of clients at the facilities where he works. That implication is injurious to Plaintiff in his profession and is defamatory per se.

5. The implication is false. Plaintiff has never been associated with, complicit in, or responsible for any abuse or neglect of clients.

6. The publication was not privileged and it was communicated to third persons via Reddit. Actual and prospective clients (and persons who refer individuals to treatment facilities) using the Internet to research Plaintiff and facilities affiliated with him were exposed to this post.

7. Julia Quinones negligently failed to ascertain the falsity of the publication before posting it.

8. Julia Quinones posted the false statements knowing that they were false and with reckless disregard as to truth or falsity. This was one month after Julia Quinones's aforementioned July 9, 2024 post. See also Facts Establishing Actual Malice (paragraphs 11-14 above).

9. As a direct and proximate result of the publication, Plaintiff sustained damage to his reputation, professional standing, economic opportunities, and personal well-being.

10. Julia Quinones deliberately exposed Plaintiff to public contempt and ridicule via her Reddit post, for the purpose of interfering with his livelihood.

WHEREFORE, Plaintiff demands judgment against Julia Quinones for compensatory damages, punitive damages, prejudgment interest, costs of suit, and such other relief as the Court deems just and proper.

FOURTH COUNT

1. The foregoing is incorporated by reference.

2. By reason of the publication identified in the Third Count, Julia Quinones placed Plaintiff in a false light which would be highly offensive to a reasonable person, and was in fact highly offensive to the Plaintiff.

3. Julia Quinones knew the falsity of the publicized matter and the false light in which Plaintiff would be placed.

4. Julia Quinones acted in reckless disregard as to the falsity of the publicized matter and the false light in which Plaintiff would be placed. See Facts Establishing Actual Malice (paragraphs 11-14 above).

5. As a direct and proximate result of the foregoing, Plaintiff sustained substantial damages.

6. Julia Quinones acted intentionally and/or recklessly and/or for the purpose of injuring Plaintiff's reputation and causing him damages, in reckless and/or wanton disregard for Plaintiff's rights.

WHEREFORE, Plaintiff demands judgment against Julia Quinones for compensatory damages, punitive damages, prejudgment interest, costs of suit, and such other relief as the Court deems just and proper.

FIFTH COUNT

1. The foregoing is incorporated by reference.

2. On August 11, 2024, J. Doe #1/ Roald-Dahl used Reddit to publish the post appended as Exhibit A-4. It begins:

Welcome to Maine, Rudy Novak (Altior/The Ridge/Ironwood) – you'll fit in perfectly with the rest of the diabolically corrupt TTI ¹ devils ruining the entire state and its education system.

¹ Troubled Teen Industry.

3. The publication was not privileged and it was communicated to third persons via Reddit.

4. This Reddit post communicated the false message that Plaintiff is corrupt.

5. Actual and prospective clients (and persons who refer individuals to treatment facilities) using the Internet to research Plaintiff and facilities affiliated with him were exposed to this post.

6. J. Doe #1/Roald-Dahl negligently failed to ascertain the falsity of the publication before posting it.

7. J. Doe #1/Roald-Dahl knew the statement was false, and it is clear from Exhibit A-4 that J. Doe #1/Roald-Dahl acted in reckless disregard for whether the statement was false:

Of course he is a tragic "filthy rotten beast of a NATSAP member!
(Which, btw is effectively a plague upon society in itself)
They should ALL be #blacklisted at this point
* * * *
CodeRudy

J. Doe #1/Roald-Dahl was using Reddit in a campaign have Plaintiff "#blacklisted" regardless of whether there was any truth to his charges.

8. See also Facts Establishing Actual Malice (paragraphs 11-14 above).

9. As a direct and proximate result of the publication, Plaintiff sustained damage to his reputation, professional standing, economic opportunities, and personal well-being.

10. J. Doe #1/Roald-Dahl deliberately exposed Plaintiff to public contempt and ridicule via the Reddit post, for the purpose of interfering with his livelihood.

WHEREFORE, Plaintiff demands judgment against J. Doe #1/Roald-Dahl for compensatory damages, punitive damages, prejudgment interest, costs of suit, and such other relief as the Court deems just and proper.

SIXTH COUNT

1. The foregoing is incorporated by reference.

2. By reason of the publication identified in the Fifth Count, J. Doe #1/Roald-Dahl placed Plaintiff in a false light which would be highly offensive to a reasonable person, and was in fact highly offensive to the Plaintiff.

3. J. Doe #1/Roald-Dahl knew the falsity of the publicized matter and the false light in which Plaintiff would be placed.

4. J. Doe #1/Roald-Dahl acted in reckless disregard as to the falsity of the publicized matter and the false light in which Plaintiff would be placed. See Facts Establishing Actual Malice (paragraphs 11-14 above).

5. As a direct and proximate result of the foregoing, Plaintiff sustained substantial damages.

6. J. Doe #1/Roald-Dahl acted intentionally and/or recklessly and/or for the purpose of injuring Plaintiff's reputation and causing him damages, in reckless and/or wanton disregard for Plaintiff's rights.

WHEREFORE, Plaintiff demands judgment against J. Doe #1/Roald-Dahl for compensatory damages, punitive damages, prejudgment interest, costs of suit, and such other relief as the Court deems just and proper.

SEVENTH COUNT

1. The foregoing is incorporated by reference.

2. Also part of Exhibit A-4 is an August 11, 2024 Reddit post by J. Doe #2/pinktiger32:

As an attorney who attended a t25 school . . . I can tell you that [Plaintiff's law school] Rutgers-Camden is a 4th tier law school. Touro University [Plaintiff's graduate program] isn't even accredited. Looks like Rudy likes spending daddy's money at these bottom feeder schools that print diplomas.

3. The publication was not privileged and it was communicated to third persons via Reddit.

4. This Reddit post communicated the false message that Plaintiff's educational credentials are fraudulent. Rutgers is not a fourth-tier school and Touro is accredited. Plaintiff earned his degrees, he did not purchase them from diploma mills.

5. Actual and prospective clients (and persons who refer individuals to treatment facilities) using the Internet to research Plaintiff and facilities affiliated with him were exposed to this post.

6. J. Doe #2/pinktiger 32 negligently failed to ascertain the falsity of the publication before posting it.

7. J. Doe #2/pinktiger32 knew the statement was false, and it is clear from Exhibit A-4 that J. Doe #2/pinktiger32 acted in reckless disregard for whether the statement was false: pinktiger32 — an anonymous stranger with no knowledge of Plaintiff — asserted specific, publicly verifiable facts about Plaintiff's degrees that are demonstrably false, and had no source or basis for doing so. Plaintiff repeats the Facts Establishing Actual Malice set forth above (paragraphs 11-14).

8. As a direct and proximate result of the publication, Plaintiff sustained damage to his reputation, professional standing, economic opportunities, and personal well-being.

9. J. Doe #2/pinktiger32 deliberately exposed Plaintiff to public contempt and ridicule via the Reddit post, for the purpose of interfering with his livelihood.

WHEREFORE, Plaintiff demands judgment against J. Doe #2/pinktiger32 for compensatory damages, punitive damages, prejudgment interest, costs of suit, and such other relief as the Court deems just and proper.

EIGHTH COUNT

1. The foregoing is incorporated by reference.

2. By reason of the publication identified in the Seventh Count, J. Doe #2/pinktiger32 placed Plaintiff in a false light which would be highly offensive to a reasonable person, and was in fact highly offensive to the Plaintiff.

3. J. Doe #2/pinktiger32 knew the falsity of the publicized matter and the false light in which Plaintiff would be placed.

4. J. Doe #2/pinktiger32 acted in reckless disregard as to the falsity of the publicized matter and the false light in which Plaintiff would be placed. See Facts Establishing Actual Malice (paragraphs 11-14 above).

5. As a direct and proximate result of the foregoing, Plaintiff sustained substantial damages.

6. J. Doe #2/pinktiger32 acted intentionally and/or recklessly and/or for the purpose of injuring Plaintiff's reputation and causing him damages, in reckless and/or wanton disregard for Plaintiff's rights.

WHEREFORE, Plaintiff demands judgment against J. Doe #2/pinktiger32 for compensatory damages, punitive damages, prejudgment interest, costs of suit, and such other relief as the Court deems just and proper.

NINTH COUNT

1. The foregoing is incorporated by reference.
2. On December 10, 2024, J. Doe #1/Roald-Dahl used Reddit to publish posts that appear in Exhibit A-5.

!!RUNAWAY AT TURNBRIDGE!! (Killingworth, CT campus) --
** Silver Alert has been cancelled ** for missing 14-yr. old girl
(who probably fled bc she was sick and tired of drinking [hot dog
image, symbolizing Plaintiff] Rudy Novak's [hot dog image] hot
dog water"

3. The publication was not privileged and it was communicated to third persons via Reddit.

4. This Reddit post communicated the false message that, while Plaintiff was working at Turnbridge, a 14-year-old girl ran away because he was sexually abusing her. It should be noted that the post links to:

<https://www.wfsb.com/2024/12/09> . . .

The article is thus dated December 9, 2024. J. Doe #1/Roald-Dahl provides the following quote:

Troopers said the 14-year old was reported missing since Sunday, December 8 [hot dog, symbolizing Plaintiff]

J. Doe #1/Roald-Dahl was one of the posters on Exhibit A-3, and thus J. Doe #1/Roald-Dahl knew Plaintiff's work history: "Director of Outreach Turnbridge Nov 2015 – Jul 2023." J. Doe #1/Roald-Dahl knew that Plaintiff had not been employed by Turnbridge for more than a year prior to the December 2024 incident reported in the news. Yet, J. Doe #1/Roald-Dahl falsely published, not only that Plaintiff was involved with Turnbridge at that time, but that he had sexually abused the 14-year-old. Plaintiff had no role in the operations or admissions of Turnbridge at the time of that incident, and no authority has ever attributed that runaway to any abuse or wrongdoing by Plaintiff.

5. Actual and prospective clients (and persons who refer individuals to treatment facilities) using the Internet to research Plaintiff and facilities affiliated with him were exposed to this post.

6. J. Doe #1/Roald-Dahl negligently failed to ascertain the falsity of the publication before posting it.

7. J. Doe #1/Roald-Dahl knew these statements was false or acted in reckless disregard for whether they were false. J. Doe #1/Roald-Dahl's decision to lie about Plaintiff sexually abusing a child at Turnbidge – knowing that

Plaintiff had not been there for a year – demonstrates J. Doe #1/Roald-Dahl's mindset in publishing lies. See also Facts Establishing Actual Malice (paragraphs 11-14).

8. As a direct and proximate result of the publication, Plaintiff sustained damage to his reputation, professional standing, economic opportunities, and personal well-being.

9. J. Doe #1/Roald-Dahl deliberately exposed Plaintiff to public contempt and ridicule via the Reddit post, for the purpose of interfering with his livelihood.

WHEREFORE, Plaintiff demands judgment against J. Doe #1/Roald-Dahl for compensatory damages, punitive damages, prejudgment interest, costs of suit, and such other relief as the Court deems just and proper.

TENTH COUNT

1. The foregoing is incorporated by reference.

2. By reason of the publication identified in the Ninth Count, J. Doe #1/Roald-Dahl placed Plaintiff in a false light which would be highly offensive to a reasonable person, and was in fact highly offensive to the Plaintiff.

3. J. Doe #1/Roald-Dahl knew the falsity of the publicized matter and the false light in which Plaintiff would be placed.

4. J. Doe #1/Roald-Dahl acted in reckless disregard as to the falsity of the publicized matter and the false light in which Plaintiff would be placed. See Facts Establishing Actual Malice (paragraphs 11-14 above).

5. As a direct and proximate result of the foregoing, Plaintiff sustained substantial damages.

6. J. Doe #1/Roald-Dahl acted intentionally and/or recklessly and/or for the purpose of injuring Plaintiff's reputation and causing him damages, in reckless and/or wanton disregard for Plaintiff's rights.

WHEREFORE, Plaintiff demands judgment against J. Doe #1/Roald-Dahl for compensatory damages, punitive damages, prejudgment interest, costs of suit, and such other relief as the Court deems just and proper.

ELEVENTH COUNT

1. The foregoing is incorporated by reference.

2. Also on Exhibit A-5 is a December 10, 2024 Reddit post published by J.

Doe #4/the_TTI_mom:

Rudy Novak can choke on his own hotdog [hotdog image] every SINGLE parent I've spoken to who had experience with Turnbridge was lied to, manipulated and abused. I can't tell you the number of HIPAA violations I saw there. PARENTS, DO NOT SEND YOUR KIDS TO THAT HELLHOLE!!!!

3. The publication was not privileged and it was communicated to third persons via Reddit.

4. This Reddit post communicated the false message that Plaintiff lies, manipulates and abuses parents of Turnbridge clients and allows HIPAA violations at the facility. Plaintiff did not lie to, manipulate, or abuse any parent or client, committed no HIPAA violation, and has never been accused by any regulator, employer, or licensing authority of any HIPAA violation.

5. Actual and prospective clients (and persons who refer individuals to treatment facilities) using the Internet to research Plaintiff and facilities affiliated with him were exposed to this post.

6. J. Doe #4/the_TTI_mom negligently failed to ascertain the falsity of the publication before posting it.

7. J. Doe #4/the_TTI_mom knew the statements were false or acted with reckless disregard as to the falsity of the statements. See Facts Establishing Actual Malice (paragraphs 11-14 above).

8. As a direct and proximate result of the publication, Plaintiff sustained damage to his reputation, professional standing, economic opportunities, and personal well-being.

9. J. Doe #4/the_TTI_mom deliberately exposed Plaintiff to public contempt and ridicule via the Reddit post, for the purpose of interfering with his livelihood.

WHEREFORE, Plaintiff demands judgment against J. Doe #4/the_TTI_mom for compensatory damages, punitive damages, prejudgment interest, costs of suit, and such other relief as the Court deems just and proper.

TWELFTH COUNT

1. The foregoing is incorporated by reference.

2. By reason of the publication identified in the Eleventh Count, J. Doe #4/the_TTI_mom placed Plaintiff in a false light which would be highly offensive to a reasonable person, and was in fact highly offensive to the Plaintiff.

3. J. Doe #4/the_TTI_mom knew the falsity of the publicized matter and the false light in which Plaintiff would be placed.

4. J. Doe #4/the_TTI_mom acted in reckless disregard as to the falsity of the publicized matter and the false light in which Plaintiff would be placed. See Facts Establishing Actual Malice (paragraphs 11-14 above).

5. As a direct and proximate result of the foregoing, Plaintiff sustained substantial damages.

6. J. Doe #4/the_TTI_mom acted intentionally and/or recklessly and/or for the purpose of injuring Plaintiff's reputation and causing him damages, in reckless and/or wanton disregard for Plaintiff's rights.

WHEREFORE, Plaintiff demands judgment against J. Doe #4/the_TTI_mom for compensatory damages, punitive damages, prejudgment interest, costs of suit, and such other relief as the Court deems just and proper.

THIRTEENTH COUNT

1. The foregoing is incorporated by reference.
2. On January 11, 2025, J. Doe #11/marsha-linehan published a Reddit post about Plaintiff. The post is contained in Exhibit A-6:

If I'm wrong, I'm wrong, but it's better to warn people about **Rudy Novak** and be wrong than not to have warned people at all considering the mass destruction of human beings and the level of human trafficking.
He has been engaged with for decades now despite being very young.

3. The publication was not privileged and it was communicated to third persons via Reddit.

4. This Reddit post communicated the false message that, for decades, Plaintiff has been engaged in human trafficking. Plaintiff has never been engaged in human trafficking or the destruction of human beings. Human trafficking is a federal criminal offense, and J. Doe #11/marsha-linehan's

allegation that Plaintiff has been engaged in such a criminal offense is defamatory per se. Plaintiff has never been investigated, charged, or convicted of human trafficking, and no court or professional body has ever characterized or suggested that his work involves human trafficking; marsha-linehan's reference to a "level of human trafficking" is pure invention.

5. Actual and prospective clients (and persons who refer individuals to treatment facilities) using the Internet to research Plaintiff and facilities affiliated with him were exposed to this post.

6. J. Doe #11/marsha-linehan negligently failed to ascertain the falsity of the publication before posting it.

7. J. Doe #11/marsha-linehan knew the statements were false, or acted with reckless disregard as to the falsity of the statements. J. Doe #11/marsha-linehan does not care whether his statements are false: "If I'm wrong, I'm wrong, but it's better to warn people about **Rudy Novak** and be wrong" See also Facts Establishing Actual Malice (paragraphs 11-14 above).

8. As a direct and proximate result of the publication, Plaintiff sustained damage to his reputation, professional standing, economic opportunities, and personal well-being.

9. J. Doe #11/marsha-linehan deliberately exposed Plaintiff to public contempt and ridicule via the Reddit post, for the purpose of interfering with his livelihood.

WHEREFORE, Plaintiff demands judgment against J. Doe #11/marsha-linehan for compensatory damages, punitive damages, prejudgment interest, costs of suit, and such other relief as the Court deems just and proper.

FOURTEENTH COUNT

1. The foregoing is incorporated by reference.

2. By reason of the publication identified in the Thirteenth Count, J. Doe #11/marsha-linehan placed Plaintiff in a false light which would be highly offensive to a reasonable person, and was in fact highly offensive to the Plaintiff.

3. J. Doe #11/marsha-linehan knew the falsity of the publicized matter and the false light in which Plaintiff would be placed.

4. J. Doe #11/marsha-linehan acted in reckless disregard as to the falsity of the publicized matter and the false light in which Plaintiff would be placed. See Facts Establishing Actual Malice (paragraphs 11-14 above).

5. As a direct and proximate result of the foregoing, Plaintiff sustained substantial damages.

6. J. Doe #11/marsha-linehan acted intentionally and/or recklessly and/or for the purpose of injuring Plaintiff's reputation and causing him damages, in reckless and/or wanton disregard for Plaintiff's rights.

WHEREFORE, Plaintiff demands judgment against J. Doe #11/marsha-linehan for compensatory damages, punitive damages, prejudgment interest, costs of suit, and such other relief as the Court deems just and proper.

FIFTEENTH COUNT

1. The foregoing is incorporated by reference.

2. On August 24, 2025, J. Doe #8/Homeless-Sea-Captain used Reddit to post statements about Plaintiff; the post is contained in Exhibit A-8 ("**Rudy Novak announces his new TTI Bird Sanctuary Clinical Partnership** [bird image] [bird image] [laughing face image] **on the shuttered Ironwood Maine campus** News"):

Seriously, though. I wonder if interventionist Rudolph-also associated with Turnbridge, Paradigm, and several other programs-ever feels guilty about the Ironwood parent (a mother) who died by suicide because of the Horton family. He and Ironwood then tried to cover it up by abruptly closing the program just a week after she had launched a "Close Ironwood" petition. That's the real reason Ironwood shut down, by the way. They treated her so terribly and bullied her so much that it drove her to take her own life.

3. The publication was not privileged and it was communicated to third persons via Reddit.

4. This Reddit post communicated the false message that Plaintiff bullied the parent of a client, that his bullying drove the parent to suicide, and that he assisted in covering up the wrongdoing. Plaintiff does not know who the “Horton family” referenced in the post is; to his knowledge he has never met, communicated with, or had any dealing or relationship with them. Plaintiff did not bully anyone, has no knowledge of any such suicide, and had nothing to do with any cover-up. No court, regulator, or law-enforcement agency has ever found that Plaintiff or Ironwood bullied any parent, caused any parent’s death, or closed any program to cover up a death. Plaintiff was hired by Altior Healthcare on July 24, 2023 as Vice President of Clinical Partnerships, an offsite role. Altior had acquired the Ironwood program before Plaintiff’s employment. The program was not shut down; it continued to operate and, in or about June 2024, was restructured and rebranded as Ridge RTC, including changes to its operational structure, business model, and client population. Plaintiff has no involvement in or responsibility for the operations, licensing, or clinical care of Ironwood, Ridge RTC, or any affiliated facility, and has no knowledge of the events described in the post. Indeed, the post itself announces Plaintiff’s “new TTI Bird Sanctuary Clinical Partnership” operating on the campus, acknowledging that the facility continues to operate under new branding and contradicting the claim that Plaintiff “closed the program” to cover up a death.

5. Actual and prospective clients (and persons who refer individuals to treatment facilities) using the Internet to research Plaintiff and facilities affiliated with him were exposed to this post.

6. J. Doe #8/Homeless-Sea-Captain negligently failed to ascertain the falsity of the publication before posting it.

7. J. Doe #8/Homeless-Sea-Captain knew the statements were false, or acted with reckless disregard as to the falsity of the statements. See Facts Establishing Actual Malice (paragraphs 11-14 above).

8. As a direct and proximate result of the publication, Plaintiff sustained damage to his reputation, professional standing, economic opportunities, and personal well-being.

9. J. Doe #8/Homeless-Sea-Captain deliberately exposed Plaintiff to public contempt and ridicule via the Reddit post, for the purpose of interfering with his livelihood.

WHEREFORE, Plaintiff demands judgment against J. Doe #8/Homeless-Sea-Captain for compensatory damages, punitive damages, prejudgment interest, costs of suit, and such other relief as the Court deems just and proper.

SIXTEENTH COUNT

1. The foregoing is incorporated by reference.

2. By reason of the publication identified in the Fifteenth Count, J. Doe #8/Homeless-Sea-Captain placed Plaintiff in a false light which would be highly offensive to a reasonable person, and was in fact highly offensive to the Plaintiff.

3. J. Doe #8/Homeless-Sea-Captain knew the falsity of the publicized matter and the false light in which Plaintiff would be placed.

4. J. Doe #8/Homeless-Sea-Captain acted in reckless disregard as to the falsity of the publicized matter and the false light in which Plaintiff would be placed. See Facts Establishing Actual Malice (paragraphs 11-14 above).

5. As a direct and proximate result of the foregoing, Plaintiff sustained substantial damages.

6. J. Doe #8/Homeless-Sea-Captain acted intentionally and/or recklessly and/or for the purpose of injuring Plaintiff's reputation and causing him damages, in reckless and/or wanton disregard for Plaintiff's rights.

WHEREFORE, Plaintiff demands judgment against J. Doe #8/Homeless-Sea-Captain for compensatory damages, punitive damages, prejudgment interest, costs of suit, and such other relief as the Court deems just and proper.

SEVENTEENTH COUNT

1. The foregoing is incorporated by reference.

2. On December 24, 2024, J. Doe #1/Roald-Dahl used Reddit to publish a statement about Plaintiff. The statement is contained in Exhibit A-9. Specifically:

Rudy has LITERALLY outed his entire awful *global* human trafficking playbook. . . . And arranges kidnappings.

3. The publication was not privileged and it was communicated to third persons via Reddit.

4. This Reddit post communicated the false message that Plaintiff is involved in human trafficking. Plaintiff has never been involved in human trafficking. Human trafficking is a federal criminal offense, and J. Doe #1/Roald-Dahl's allegation that Plaintiff has been engaged in such a criminal offense is defamatory per se. The same post also conveys the false message that Plaintiff arranges kidnappings; Plaintiff has never arranged any kidnapping, and kidnapping is likewise a criminal offense, the imputation of which is defamatory per se. Plaintiff has never been investigated, charged, or convicted of human trafficking or kidnapping, and no court or professional body has ever characterized his work as involving human trafficking or the arranging of kidnappings. Roald-Dahl's references to a "global human trafficking playbook" and to Plaintiff's arranging of kidnappings are pure invention.

5. Actual and prospective clients (and persons who refer individuals to treatment facilities) using the Internet to research Plaintiff and facilities affiliated with him were exposed to this post.

6. J. Doe #1/Roald-Dahl negligently failed to ascertain the falsity of the publication before posting it.

7. J. Doe #1/Roald-Dahl knew the statements were false, or acted with reckless disregard as to the falsity of the statements. See Facts Establishing Actual Malice (paragraphs 11-14).

8. As a direct and proximate result of the publication, Plaintiff sustained damage to his reputation, professional standing, economic opportunities, and personal well-being.

9. J. Doe #1/Roald-Dahl deliberately exposed Plaintiff to public contempt and ridicule via the Reddit post, for the purpose of interfering with his livelihood.

WHEREFORE, Plaintiff demands judgment against J. Doe #1/Roald-Dahl for compensatory damages, punitive damages, prejudgment interest, costs of suit, and such other relief as the Court deems just and proper.

EIGHTEENTH COUNT

1. The foregoing is incorporated by reference.

2. By reason of the publication identified in the Seventeenth Count, J. Doe #1/Roald-Dahl placed Plaintiff in a false light which would be highly offensive to a reasonable person, and was in fact highly offensive to the Plaintiff.

3. J. Doe #1 knew the falsity of the publicized matter and the false light in which Plaintiff would be placed.

4. J. Doe #1 acted in reckless disregard as to the falsity of the publicized matter and the false light in which Plaintiff would be placed. See Facts Establishing Actual Malice (paragraphs 11-14 above).

5. As a direct and proximate result of the foregoing, Plaintiff sustained substantial damages.

6. J. Doe #1 acted intentionally and/or recklessly and/or for the purpose of injuring Plaintiff's reputation and causing him damages, in reckless and/or wanton disregard for Plaintiff's rights.

WHEREFORE, Plaintiff demands judgment against J. Doe #1/Roald-Dahl for compensatory damages, punitive damages, prejudgment interest, costs of suit, and such other relief as the Court deems just and proper.

NINETEENTH COUNT

1. The foregoing is incorporated by reference.

2. On March 1, 2025, J. Doe #4/the_TTI_mom posted a statement about Plaintiff on Reddit. The statement appears on Exhibit A-7. In response to a post ("Is this HOT DOG RUDY NOVAK by chance? I'm not buying these Tunbridge posts based on historical internal mod knowledge. I would not bite people."), J. Doe #4/the_TTI_mom posted:

If it's HOT DOG Rudy, he wont give his number although I'd love to have a chat with the scum bag and tell him what I think of his profession in child abuse.

3. The publication was not privileged and it was communicated to third persons via Reddit.

4. This Reddit post communicated the false message that Plaintiff has committed child abuse in connection with facilities where he has worked. Plaintiff has never committed child abuse.

5. Actual and prospective clients (and persons who refer individuals to treatment facilities) using the Internet to research Plaintiff and facilities affiliated with him were exposed to this post.

6. J. Doe #4/the_TTI_mom negligently failed to ascertain the falsity of the publication before posting it.

7. J. Doe #4/the_TTI_mom knew the statements were false, or acted with reckless disregard as to the falsity of the statements. See Facts Establishing Actual Malice (paragraphs 11-14 above).

8. As a direct and proximate result of the publication, Plaintiff sustained damage to his reputation, professional standing, economic opportunities, and personal well-being.

9. J. Doe #4/the_TTI_mom deliberately exposed Plaintiff to public contempt and ridicule via the Reddit post, for the purpose of interfering with his livelihood.

WHEREFORE, Plaintiff demands judgment against J. Doe #4/the_TTI_mom for compensatory damages, punitive damages, prejudgment interest, costs of suit, and such other relief as the Court deems just and proper.

TWENTIETH COUNT

1. The foregoing is incorporated by reference.

2. By reason of the publication identified in the Nineteenth Count, J. Doe #4/the_TTI_mom placed Plaintiff in a false light which would be highly offensive to a reasonable person, and was in fact highly offensive to the Plaintiff.

3. J. Doe #4/the_TTI_mom knew the falsity of the publicized matter and the false light in which Plaintiff would be placed.

4. J. Doe #4/the_TTI_mom acted in reckless disregard as to the falsity of the publicized matter and the false light in which Plaintiff would be placed. See Facts Establishing Actual Malice (paragraphs 11-14 above).

5. As a direct and proximate result of the foregoing, Plaintiff sustained substantial damages.

6. J. Doe #4/the_TTI_mom acted intentionally and/or recklessly and/or for the purpose of injuring Plaintiff's reputation and causing him damages, in reckless and/or wanton disregard for Plaintiff's rights.

WHEREFORE, Plaintiff demands judgment against J. Doe #4/the_TTI_mom for compensatory damages, punitive damages, prejudgment interest, costs of suit, and such other relief as the Court deems just and proper.

TWENTY-FIRST COUNT

1. The foregoing is incorporated by reference.

2. On October 16, 2025, J. Doe #9/rjm2013, using Reddit, posted a statement about Plaintiff; see Exhibit A-10. Responding to a post ("Can someone shed some insight as to why this specific person is hated in the community? I'm so curious"), J. Doe #9/rjm2013 published:

So what is "wrong" with Rudy? It's simple: he gets it absolutely wrong. The TTI kidnapping kids and holding them against their will for profit? It's never going to be acceptable. Not ever.

3. The publication was not privileged and it was communicated to third persons via Reddit.

4. This Reddit post communicated the false message that Plaintiff kidnaps children. Plaintiff has never kidnapped anyone. Kidnapping is a criminal

offense, and thus J. Doe #9/rjm2013's allegations that Plaintiff has committed kidnapping are defamatory per se.

5. Actual and prospective clients (and persons who refer individuals to treatment facilities) using the Internet to research Plaintiff and facilities affiliated with him were exposed to this post.

6. J. Doe #9/rjm2013 negligently failed to ascertain the falsity of the publication before posting it.

7. J. Doe #9/rjm2013 knew the statements were false, or acted with reckless disregard as to the falsity of the statements. See Facts Establishing Actual Malice (paragraphs 11-14 above).

8. As a direct and proximate result of the publication, Plaintiff sustained damage to his reputation, professional standing, economic opportunities, and personal well-being.

9. J. Doe #9/rjm2013 deliberately exposed Plaintiff to public contempt and ridicule via the Reddit post, for the purpose of interfering with his livelihood.

WHEREFORE, Plaintiff demands judgment against J. Doe #9/rjm2013 for compensatory damages, punitive damages, prejudgment interest, costs of suit, and such other relief as the Court deems just and proper.

TWENTY-SECOND COUNT

1. The foregoing is incorporated by reference.

2. By reason of the publication identified in the Twenty-First Count, J. Doe #9/rjm2013 placed Plaintiff in a false light which would be highly offensive to a reasonable person, and was in fact highly offensive to the Plaintiff.

3. J. Doe #9/rjm2013 knew the falsity of the publicized matter and the false light in which Plaintiff would be placed.

4. J. Doe #9/rjm2013 acted in reckless disregard as to the falsity of the publicized matter and the false light in which Plaintiff would be placed. See Facts Establishing Actual Malice (paragraphs 11-14 above).

5. As a direct and proximate result of the foregoing, Plaintiff sustained substantial damages.

6. J. Doe #9/rjm2013 acted intentionally and/or recklessly and/or for the purpose of injuring Plaintiff's reputation and causing him damages, in reckless and/or wanton disregard for Plaintiff's rights.

WHEREFORE, Plaintiff demands judgment against J. Doe #9/rjm2013 for compensatory damages, punitive damages, prejudgment interest, costs of suit, and such other relief as the Court deems just and proper.

TWENTY-THIRD COUNT

1. The foregoing is incorporated by reference.

2. Plaintiff has a legally protected interest in carrying on his aforementioned profession. He pursues his legally protected interest for actual and prospective economic advantage.

3. As set forth above, Julia Quinones, J. Doe #1, J. Doe #2, J. Doe #4, J. Doe #8, J. Doe #9, J. Doe #11, and J. Does #12-#20 have interfered with Plaintiff's pursuit of economic advantage.

4. Julia Quinones, J. Doe #1, J. Doe #2, J. Doe #4, J. Doe #8, J. Doe #9, J. Doe #11, and J. Does #12-#20 interfered without justification and otherwise with malice.

5. Said defendants' tortious interference caused the loss of Plaintiff's actual and prospective economic gain.

6. As a direct and proximate result of the foregoing, Plaintiff has sustained substantial damages.

7. Julia Quinones, J. Doe #1, J. Doe #2, J. Doe #4, J. Doe #8, J. Doe #9, J. Doe #11, and J. Does #12-#20 acted intentionally and/or recklessly and/or for the purpose of injuring Plaintiff's reputation and causing him damages, in reckless and/or wanton disregard for Plaintiff's rights.

WHEREFORE, Plaintiff seeks judgment against Julia Quinones, J. Doe #1, J. Doe #2, J. Doe #4, J. Doe #8, J. Doe #9, J. Doe #11, and J. Does #12-#20, jointly, severally and in the alternative, for the following:

- (a) Damages;
- (b) Punitive damages;
- (c) Prejudgment interest;
- (d) Costs of suit; and
- (e) Such further relief as may be just and proper.

TWENTY-FOURTH COUNT

1. Plaintiff repeats and realleges the preceding paragraphs as though fully set forth herein.

2. Defendants, by coordinated conduct on Reddit, Instagram, and related platforms, agreed or acted in concert to publish, republish, amplify, and preserve false and defamatory statements and false-light implications concerning Plaintiff.

3. Defendants' coordinated conduct included creating threads focused on Plaintiff, repeating the same themes of abuse, human trafficking, HIPAA violations, wrongful death, kidnapping, sexual misconduct, and professional unfitness, cross-referencing publications, encouraging third-party engagement, and amplifying each other's statements.

4. The object of the conspiracy was to injure Plaintiff's reputation and professional relationships by falsely associating him with criminal, unethical, and professionally disqualifying conduct.

5. One or more Defendants committed overt acts in furtherance of the conspiracy, including the publications identified in the counts above and the republication, amplification, and discussion of those publications.

6. As a direct and proximate result of Defendants' conspiracy and overt acts, Plaintiff sustained reputational, professional, economic, and personal damages.

WHEREFORE, Plaintiff demands judgment against Julia Quinones, J. Doe #1, J. Doe #2, J. Doe #4, J. Doe #8, J. Doe #9, J. Doe #11, and J. Does #12-#20 for compensatory damages, punitive damages, prejudgment interest, costs of suit, and such other relief as the Court deems just and proper.

Date: June 30, 2026

s/ Rudolph Novak
Rudolph Novak, Plaintiff

REQUEST FOR JURY DETERMINATION

Plaintiff seeks a jury determination on all issues so triable raised herein.

CERTIFICATION

Rudolph Novak, being of full age, certifies the following to be true:

1. The within matter is not the subject of any other pending action or arbitration proceeding, except as follows: The within matter is the subject of an action in Superior Court of California, San Francisco County, captioned In the

Matter of the Subpoena Issued to Reddit, Inc.; J. Doe Nos. 1, 4, 8, and 11, Petitioners, v. Rudolph Novak, Respondent, Case No. CPF-26-519752. No other action or proceeding is contemplated.

2. Besides the fictitiously identified J. Does, I know of no other parties who should be joined in this matter at this time.

3. I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Date: June 30, 2026

s/ Rudolph Novak
Rudolph Novak

EXHIBIT G

Rudolph Novak (NJ Attorney ID #003582010)

5 Ridgewood Drive

Randolph, NJ 07869

Phone: 856-906-2980

E-Mail: rudy@rvnlaw.com

Pro Se Plaintiff

RUDOLPH NOVAK,	:
	:
Plaintiff,	:
	:
V.	:
	:
	:
JULIA QUINONES	:
(A.K.A.	:
“Glad-Cheesecake2959”	:
and “codeadampodcast”),	:
J. DOE #1	:
("Roald-Dahl"),	:
J. DOE #2	:
("pinktiger32"),	:
J. DOE #4	:
(“the_TTI_mom”),	:
J. DOE #8	:
(“Homeless-Sea-Captain”),	:
J. DOE #9	:
(“rjm2013”),	:
J. DOE #11 ("marsha-	:
linehan"),	:
J. DOE #12 - #20	:
(other fictitiously-	:
designated persons),	:
	:
Defendants.	:

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION-CIVIL PART
MORRIS COUNTY
DOCKET NO. MRS-L-1804-25

Civil Action

REQUEST FOR DISCOVERY

Plaintiff seeks from Reddit, Inc. the information needed to identify and locate the holders of the usernames Roald-Dahl, pinktiger32, the_TTI_mom,

Homeless-Sea-Captain, rjm2013, and marsha-linehan — names, e-mail and mailing addresses, telephone numbers, registration and login IP information, account-creation dates, and identity-bearing billing records (not the content of any communication).

Date: June 30, 2026

s/ Rudolph Novak

Rudolph Novak, Plaintiff