

NO. 23-279

24-5656

In the Supreme Court of The United States

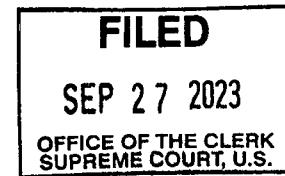
24-5656

Courtney Green,

ORIGINAL

Petitioner ,

V.



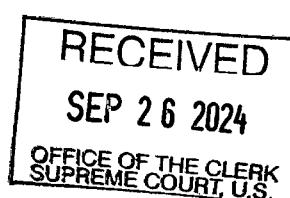
Paramount Global

Respondent.

On Petition For Writ of Certiorari to

the United states Court of Appeals For the

Petition for Writ of Certiorari



Courtney Green
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Question Presented

Whether the respondent Paramount acted negligently in addressing the conduct of its staff and the integrity of its network. Did Paramount unconventionally use data and spyware capabilities in a manner that violated privacy laws, electronic and network regulations, statutes and the petitioners constitutional rights. Did employees of the respondent Paramount participate in conduct that aided in corrupt intent and racketeer influenced acts; At the expense of The petitioners Character; were methods of unconsented surveillance in fact used to exploit, defame, profit, control, gather and distribute personal data and other findings about the petitioners person for ulterior motives?

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❖ **Consumer Privacy Act (CPA)**

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IN THE
SUPREME COURT OF THE UNITED STATES
PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

OPINIONS BELOW

[] For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix 3 to the petition and is

[~~✓~~ reported at Second Circuit; or,
[] has been designated for publication but is not yet reported; or,
[] is unpublished.

The opinion of the United States district court appears at Appendix 5 to the petition and is

[✓ reported at southern district court; or,
[] has been designated for publication but is not yet reported; or,
[] is unpublished.

[] For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix _____ to the petition and is

[] reported at _____; or,
[] has been designated for publication but is not yet reported; or,
[] is unpublished.

The opinion of the _____ court appears at Appendix _____ to the petition and is

[] reported at _____; or,
[] has been designated for publication but is not yet reported; or,
[] is unpublished.

Petition For Writ of Certiorari

Petitioner Courtney Green respectfully requests the issuance of a writ of certiorari to review the judgment of the United States Court of Appeals for the Second Circuit.

Decision Below

The decision of the district of California is published in the ninth circuit 2022.

The decision of the United States Court of appeals is published at the ninth Circuit 2023.

Jurisdiction

I the petitioner, Courtney Green seek review of the August 16,2023 order of the Second circuit court of appeals in case 23-279 ;mandated September 15,2023 as well as the denied decision for the petition for rehearing denied September 8,2023

Federal Rule Involved

Media and network personnel were able to openly use spyware and other methods of electronic surveillance to collect data, eavesdrop and harass the petitioner; Actively participating in the act of Invasion of Privacy through the disclosure of private facts and intrusion of solitude, Illegal gathering and disbursement of private information. Violating the electronic communications privacy act, the stored communications act, consumer privacy protections act, the cybersecurity information sharing act. Participating in racketeer influenced acts with corrupt intent, exploitation, defamation of character, malice and non consensual use of private information and personal data, eavesdropping, misconduct, harassment and violation of professional conduct, exposure of trade secrets resulting in unfair business practices, consumer privacy act.

Statement of Case

The respondent Paramount unconventionally used methods of spyware, eavesdropping and company data collection and surveillance capabilities to target, gather and exchange intel about the petitioner's person throughout its network and mass audience. These methods were used to conceal acts of exploitation, non consensual monitoring and studying of the petitioner through constant intrusion of his private dwelling place. These acts of misconduct have continuously occurred since 2020 and due to the respondent's negligence in addressing the integrity of its network it has aided in the pain and suffering of the petitioner and show to be undoubtable organized corrupt intent and racketeer influenced acts.

I. Green's circumstantial evidence shows that Paramount unconventionally used methods of spyware and abused network capabilities to surveil, eavesdrop, exploit, intrude solitude and harass the petitioner constantly from 2020 to present year 2023.

During the CBS morning show between the dates 05/08/2020-02/13/2021 and hours of 6am-9am anchors acknowledged that they could physically view me while live on air in various ways such as acknowledging reactions to conversations and morning stories as well as making jokes and laughing at me being seen and my at the time living situations; stating that I was homeless. During this timeframe CBS morning staff mockingly joked about the ridicule being endured by the plaintiff which turned out to be secretly organized malice, orchestrated by them and a group of associates. In one instance the CBS Morning host jokingly showed a brief football clip of a team passing the football off laterally before being tackled as an example of what they were doing in real time as they all laughed while I viewed; During this time there were news stories hinting around things that I was doing for example business endeavors I was pursuing at the time such as a jewelry piece I was attempting to create via online which led me to believe my online browsing was being monitored. This was mentioned in a Missouri filing (ref. Green v. Midwest genealogy Center USCA 22-1915). One morning while viewing this happening I stated out loud "Who do I talk to about this?" Shortly after I began experiencing mishaps. Anchors and host also conducted interviews and hosted virtual guest appearances where host and guest would make direct and indirect comments about my person while holding discussions; for example in one instance with Tyler Perry comments were made, one in which including me being referred to as a slave. Following this incident involving remarks on CBS This morning with guest Tyler Perry, The Actor/producer and CEO of Tyler Perry studios later came out with a movie which included references of my person and hints at intellectual property communicated to an associate via online message in regards to a business endeavor. (*Ref. green v. Midwest Genealogy Center USCA 22-1915* in the document titled "*Statement of Facts*" *This also was later mentioned/hinted at in The Tyler Perry movie "Homecoming" that was recently released in 2022*). In this movie Tyler Perry playing the role of Medea referenced an idea for an introduction video I was attempting to create for my brand logo which involved a squirrel coming down from a tree. (see exhibit A) These vendor accounts would then be disabled, blocked or deleted so said idea would be impossible to create or finish and I would later see this idea or creation implemented or mentioned into show criteria, a movie(s) or used by someone else such as in an instance like this or with "Izod corporate HQ", General Mills World HQ etc.. This again further showed without a doubt that my online browsing activity was being monitored and somehow obtained. In 2023 Tyler Perry also attempted to purchase parts of CBS network but later backed out of the deal.course. On another occasion I begin actually seeing designs that I had created or specific color schemes from

design in stores such as in Walmart Supercenter 11601 E US Hwy 40, Kansas City, MO 64133 on 02/16/2021 I entered the store around 4:30pm and discovered that most of the men's section of the store was filled with a shirt design I had previously done and had worked on while using the Midwest Genealogy Center computer services.

In 2020 while viewing the CBS this morning show Gayle King held a virtual interview with the guest actress Glen Close who played the Cruella de'vil character in the original 101 dalmatians movie. I sat in the lobby of a Price Chopper located off e 23rd street in independence,mo, while at this location I ate breakfast and sat at a table that had an artificial potted flower arrangement decoration. While viewing this interview it was acknowledged that the flower arrangement contained a hidden camera when I looked at the flowers a part that looked to be of glitter and gemstones sparkled and flickered I looked back at the television and both Ms. King and Ms.Close smiled and laughed. This is an example of the many methods of surveillance that have and are being used to carry out this non consensual scheme. Between the dates

05/27/2021-06/28/2021 a news anchor Gayle King observed me tuning into the show via CBS App and shouted "what do you want!?" At that time my server was disconnected and all viewing capabilities were disabled. This incident showed that the Respondent Paramount and it's employees were well aware of the cyber breach, surveillance and the monitoring of my person, This also proved that The appellant Paramount was and is fully capable of stopping all surveillance and data collecting capabilities but neglected to do so.

While live on CBS sports NFL season 2020 and 2021 sports hosts on the show made joking comments on and about my person laughing at different occurrences happening at the time exchanging obtained information during on field interviews and halftime shows such as if I had just gotten out of the shower, food preparation, etc. It was shown and acknowledged at times that this was happening when fans or players would show disapproval of comments being made. This could be seen throughout various Sunday programs and sports talks.

Also on CBS sports during the DR. Pepper throw for free tuition challenge 12/04/2021 a sports anchor referred To me as 4 and signally at the camera, also hinting at and making verbal attempts at bribery towards participants stating and I quote "Remember we've been giving you free money and paying for your school for x amount of years", after hearing rumors of a suit being filed. During the sports season there were comments made on CBSsports as well as Fox sports and NBC sports regarding my person such as "now there's nowhere you can hide" further showing that the surveillance and stalking of my person was openly occurring, similar remarks were also stated on various occasions throughout this debacle with other jokes like "what's he going to do sue all of us?". On Cbs sports

January 29, 2023 during nfl sunday, it was acknowledged that I could still be seen' and other comments were made pertaining to my person It was also acknowledged by staff of the respondent confirming footage seen of other employees of The Paramount mentioned in incidents of this suit caught in the act described in the document titled "Statement of Facts", Stating things like "*Is that me? Yep, that's you!*" After learning of further legal actions being taken against the Respondent and its counterparts, local news reporters and weatherman of KCTV5 as well as sports personnel, commentators and anchors of CBS Sports all began stating on numerous occasions and I Quote "It Doesn't matter." Further exhibiting their negligence and careless disregard for past and present actions and recourse, while also showing signs of intimidation because of the intel they had gathered throughout this timeframe and the conspiring of preplanned malice. During the dates 05/08/2020-02/13/2021 anchors of local news station KCTV5 between the hours of 5am -8am and again at 10am it was acknowledged that they could see me, making jokes and comments, at times exhibited bullying, harmful,offensive or harassing behavior while implementing outsourced information about my person through news stories such as stating that I was homeless and Laughing because I could do nothing about the viewing of my person, often times with news stories regarding KCTV5 as well as other news stations and shows the stories would include hints at places I had visited or something that was done either earlier that day or a few days previously ; whether it were online or while on my daily commute, in some instances there were phrases quoted from things I had said while speaking which alerted me that my conversation was somehow being monitored and that there was some form of spyware being used. For instance,

back in 2020 through early 2021; on daily commutes I would normally start my day with breakfast at the Price chopper off 23rd street and 291 hwy in Independence,Mo then head to one of the surrounding libraries in the area which all included in pro se lawsuits (Ref. green v.

mid-continent library-northindependence branch, green v. kansas city public library- trails west branch USCA 22-2468, green v. midwest genealogy ^{center} USCA-22-1915)One morning around october through mid november of 2020 It was stated by an anchor while on air after covering the traffic report that I was going to the library up north on ambassador drive(*mid-continent library 8656 N Ambassador Dr, Kansas City, MO 64154, United States*)which is now no longer there such as several other business that have closed around town including the dollar general mentioned in filing (USCA 23-1892 *Courtney Green v. General Mills World HQ, et al*) that relocated to another building in the adjoining lot and was replaced by quicktrip. During this time I was having issues with my online browsing activity being monitored and exploited and I

had previously traveled to this area on a bus and had visited this branch. This was one way the respondent Paramounts network staff used their platform and exploited spyware to monitor, study and project my daily commutes to organize malice by intentionally alerting its viewing audience and associates. In another segment during the months August through October of 2020 A youtube video was shown of a squirrel going through an obstacle course in reference to me being the squirrel in regards to my clothing brand logo including a squirrel which further led me to believe my online business activity was being monitored, At the end of the youtube video that squirrel was caught in a trap and killed amongst other things; further exemplifying a preplanned ulterior motive and now showing to have been a scheme that has unfolded over the course of time.

During the Drew Barrymore show between the dates 09/15/2021-11/15/2021, Drew Barrymore as well as the co host participated in jokingly comments on and about my person and even added in a bit about previous clothing style options such as green cargo pants that I had previously worn in the past amongst other things showing that they were in fact talking about me and explained why random photos of me were being taken by strangers while I was out and about, further proving orchestrated acts of stalking. In one particular instance Drew Barrymore was conversing with a guest on the show about a movie "Miss Meadows" she was promoting where the catchphrase for her character was "too-do-loo!" ; they began joking about mishaps they had seen me go through in retrospect to the daily stalking/ following that was occurring at the time. Aside from having random photos taken by strangers while out, I also experienced mishaps while grocery shopping. These issues included the monitoring and studying of food choices which led to exploitation of culinary choices, controlled grocery options as well as the tampering of and contamination of goods purchased; which I have reported and submitted numerous complaints about. While viewing this segment The guest star shouted and I quote "Go to the store" while laughing she also made other comments regarding culinary choices such as cereal and milk that I would frequently purchase and be eating during the mornings while viewing this and other morning shows. This further confirmed not only my daily habits were being studied and monitored but my shopping habits were as well. This also raised the notion that secret footage was being exploited. I also submitted a subpoena to the courts for the timeframe of this incident. In another instance while viewing the Drew Barrymore show, there were props on the show set up similar to the likeness of the bedroom at the place in which I was residing at the time which led me to believe that there were other methods of hidden surveillance/spyware being used as well that were also being secretly

monitored and exploited because there was no television in the bedroom, As the guest and Drew Barrymore conversed the guest began indirectly making comments regarding findings and things about my person that led me to believe there were forms of stalking happening. This was also mentioned in similar Filings with Viacom CBS and ABC Entertainment inc. and Lg Electronics (ref. Green V. Viacom CBS USCA 22-724, green v. ABC Entertainment Inc. USCA 22-899, green v. Lg Electronics USA inc/Lg

Electronics inc.). In another instance/episode Ms. Barrymore hosted guests from a previous movie she had done called “Charlie's Angels” where they played a game to see if the crowd could figure out which one of the guest stars was actually in the studio on stage and which was an illusion as a play on AI technology and delusion.

On the Late night show with James Corden, Host James Corden made blatant abusive,harmful, offensive,vulgar and obscene direct and indirect comments on or about my person. Not only acknowledging he could view me through the television on numerous occasions in various ways such as pointing to the camera as I flipped through the channels or as I tuned in, carelessly participated in verbal abuse towards my person stating in one instance and I quote “He's a Bitch”, “he's not going to do anything about it.” In one episode after filing a lawsuit it was stated indirectly while looking into a cup mentions of death. During the show, around late October 2021 through November of 2021; host James Corden also referred to my business after somehow getting word of business ventures being pursued at the time, made open claims while live in front of an audience regarding my business such as “It's just a small business”. At the time I was experiencing difficulty

with interactions with business associates as well as had been having issues with accounts being targeted, closed as well as other methods of obstructing progress or productivity; Which was similar to occurrences that happened back in 2020 and early 2021 with the CBS morning show and kctv5. During this time I also had an invasion of privacy pro se claim against the schweitzer brentwood branch library in Springfield, Missouri (Ref. USCA 22-1906). In the case it was explained how my online browsing activity was being secretly obtained and exploited throughout television programs, media, marketing and advertising and leading to theft of trade secrets,unfair business practices and theft of intellectual property. The claims further showed to be true with the statements made during airings of this show as well as other programs of the Respondent Paramount. With the collective comments made by Mr. Corden employed by the respondent Paramount,other television personnel and its associates/affiliates; you can see how this could impact someone's business affairs. For instance, a 12 week poll

stated that The late night show with James Corden Averages around 430,000 viewers ranging from ages 7+. With a following of that magnitude, if said host were to tell loyal viewers to do something, recommend or even simply hint at a specific thing with knowledge of compromised online browsing activity; such as a sweater or hoodie for instance, Imagine how easily it would be for that said host to conceal the act of and intentionally cause/infect malice towards an individual or said business while conducting daily show segments and treating it as if it is just another comedic skit,joke or story. These said incidents occurred on multiple nights within a 3 year time span. While acknowledging these facts you can see how the seed and process of uncontrollable malice is planted and manifested and the impact it has made;especially as a “Small business”. That is just the tonight show, On average “CBS Morning” caters to around 2.46 million viewers alone!. If each show is dispersing personal information or implementing findings into show criteria for its personal audience, imagine how easy it would be to carry out plots of malice or conceal the act of racketeering and other foul play. In regards to mentions and hints involving business ventures and intellectual creativity, As it was mentioned throughout the document titled “Statement of Facts” Employees and associate of the appellee Paramount acknowledged, made aware and exploited the fact that my online browsing activity was being secretly monitored by showing specific details, using the likeness of said ideas,creations or dialogue to alert it’s audience of viewers of my current or most recent endeavors. This lead to interruption in production/progress, disruption in communication, the theft of said property or idea or most frequently; a complete halt in the creative process. The monitoring of my online browser activity with mentions of implemented

material into show sketches and criteria was mentioned in several Missouri filings (Ref. green v. Kansas city public library-Waldo Branch USCA 22-2469, green v.Kansas city public library- trails west branch USCA 22-2468, green v. Midwest genealogy Center USCA 22-1915, green v. mid continent library-north

independence branch, green v. Schweitzer brentwood branch library USCA 22-1906) With hints of cyber security breaches that compromise the security of someone's business data, production and personal financial keeping could negatively impact that entity's customer/consumer base. As a small business the

customers accumulated through sales and advertising is what creates sustainability, If customers know and feel that there online purchasing information is in jeopardy or could potentially be compromised due to television personnel using cyber breaches as a practical joke, Consumers are far less likely to make a purchase or shop with your business ultimately leading to

less sales, decline in traffic and ultimately the closing of business, this also is true when conversing with vendors and business associates regarding the creation of products, goods and services. While observing this it is shown how the implementation of private

information obtained through no consensual methods of surveillance has affected my person. It has been stated on a few occasions things like "He has no proof", "what's he going to do sue all of us? lol", "He's Delusional" etc. The Appellee Paramount as a whole is so confident in conveying it's act of innocents because it has such a broad audience and following that without careful monitoring and knowledge of the situation actions could easily be concealed by speaking indirectly about something or implementing information into show criteria such as comedy skits or other forms of criteria; someone unaware would miss it. Back in early 2020 during a game segment of the late night show with James Corden called "Spill your guts" James Corden had a guest appearance with Justin Bieber where Mr. Corden and Bieber participated in a game where they would eat weird foods while asking each other questions. During this segment it was implemented into game show discussion specific happenings regarding consuming food and the spitting up of different contaminants and references to having people then collecting this discarded waste. (ref <https://www.youtube.com/watch?v=ukI8R1Vesew>) This had been an issue that I have been dealing with since early 2020 up to present time with store bought food and beverages consumed that contained something that had different effects on body parts or caused illness that caused me to spit up in attempts to get it out. From time to time I would see TV personnel acknowledge in one way or another a body part or something that was affected while a certain food or beverage was consumed on several different occasions. While viewing this show as well as several other programs it was implied that I should be getting paid for this as if there was some sort of secret study or testing of some sort going on without my knowledge; In other instances things were said such as he's doing all this for free or he could get paid but there is no contract or other references to my person as being a lab rat or test subject. During a Sunday NFL football airing in 2022 it was stated by sports anchors/commentators "Whatever you're feeding him, keep doing it! I don't care." I have reached out to proper food safety organizations regarding this matter and it has been an ongoing issue throughout this matter.

Misconduct was performed alone and with nightly guests during the late night show with James Corden. Some guests even warned James Corden that he could not do this to people and that his behavior was unacceptable, The live in studio crowd showed that they were displeased with this behavior and that it was having a negative impact and less than enjoyable viewing experience. One

staff member of the show even stated while conversing with Mr. Corden and I quote “He’s got you by the balls” around the time a lawsuit was filed back in December of 2021. Also during The month of December 2021 around christmas time on the last episode of the show before the year's end, In addition to the 3 years acknowledged in reference to this suit; it was implied by Host James Corden that they had been doing this for about 10 to 12 years.

During 2023 While happening to tune into The late night w James Corden show I observed Mr Corden and guest of the show improving comedic skits with implemented criteria regarding my person and even made references to a NDA contract that I had drawn up for a business agreement regarding a audio studio session, Further showing that this behavior was still occurring without my knowledge or even tuning into the show. While viewing the late night wJames corden show back in between June through August of 2023 James corden even conducted an episode to create the illusion that he had gotten fired or kicked off the show and a few days later while happening to turn to the channel 5 station; He and show staff began laughing and then gave a puzzled look of amazement and confusion because they observed my disinterest. This was one of many schemes in attempts to cause delusion or a sense of fabrication by airing reruns and or mixing pre aired segments with live airings.

On local KOlr-10 news in Springfield, Mo during the month of November 2021 a meteorologist of a Saturday morning airing went on a rant about how he could physically view me and how this has been going on for a

while hinting at different events that have taken place while I had been in that viewing area. During the fall and winter of 2021 on Kolr-10 local news station in several instances particularly on Sunday nights after the nfl games between October 2021 through December 2021 anchors attempted to

converse with me on several occasions, also acknowledging they could view me through the television stating things like “Hey, we’re trying to talk to you!” as well as other indirect comments while conversing sitting on the in studio couch; regarding things that were occurring either on a day to day or weekly basis with things also implemented or hinted at in new stories.

While viewing KCTV August 11,2022 5pm -6pm news there were comments made by a lady meteorologist indirectly about me viewing and that I would be gone soon referring to me moving etc. and other information implemented into stories. Between february- june of 2023 news anchors and meteorologist from both kctv5 and kolr-10 news from the Springfield,Mo location previously mention began appearing on kctv5, similar to What was described in the behavior and activity observed and described in missouri

filings involving library staff. (ref. green v. mid-continent library-north independence branch, green v. kansas city public library- trails west branch USCA 22-2468,Kansas city public library-Waldo branch USCA 22-2469) In these filings it is described how library branch staff would switch and alternate locations to exchange information and findings about my person amongst colleagues and/or use this as a method to confirm connections or see whom my person was.

During this time; between February of 2023 through July of 2023 I again began experiencing difficulties in obtaining employment as well as mishaps with finances, shopping, media and stalking etc. and also observed anchors and meteorologist etc. saying zero or finding clever ways to implement this while on air in regards to me running out of money and to hint at my bank account being monitored. In one instance while watching a kctv5 weather forecast the meteorologist even went as far as to place zeros for the temperature of the full week. While live on air after happening to tune into a forecast on KCTV5 in which a meteorologist from the Kolr-10 Springfield, MO station previously mentioned in regards to occurrences in 2022 after NFL Sunday night football games, was conducting a weather report on KCTV5, finished the forecast. It was sent back to a male anchor that was previously mentioned in incidents in 2021 evening segments of KCTV5 stated aloud while on air "That's, and [stating the meteorologist name]". As to alert others or to confirm a notion, as if there had been some sort of speculation or conversing going on. During this time a family member was in town from Springfield, MO, where at the time back in September of 2021 through early 2022 I resided.

On August 12, 2022 While viewing the Stephen Colbert Late night show there were mentions of a contract and/or agreement amongst other things such as to reference to myself and other viewers as comedic insults, it was also acknowledged of me suing on several occasions. During 11/28/2022 While viewing the show "the neighborhood" which airs on the respondent Paramounts CBS network; cast of the show participated in indirect commentary made about my person implemented into show criteria, during this airing some sort of contract was yet again mentioned. In this instance it was referred to as ending because at the time I was projected to be moving as previously explained to be stated by a kctv5 meteorologist in a comment made while I had tuned in on August 11, 2023 during a 5pm-6pm during a weather reading. Following these incidents I submitted several complaints to paramount as well as the producer of the show. Shortly after Both 38.1/38 the spot where I would watch the show "The Neighborhood" and 38.2 bounce tv became unviewable as if the signal for these channels were permanently disabled, blocked or jammed from me

viewing; Although I never received any response or acknowledgement from Paramount or the producer Tagan lee. After the signals were lost for these channels there were other attempts made to disconnect other channels while I was viewing, which were also described in additional complaints. This shows how the issue escalated and how tv personnel conspired to find new ways to control my data and viewing capabilities.

Following my initial lawsuit filings; Employees of the television industry began using there platform to alert the masses of legal actions being taken against them, or stating things that were observed during my daily online browsing activity or vaguely quoted verbatim from the lawsuits filed or from documents that were in the process of being configured but had not been submitted yet, further indicating that various forms of stalking were in fact occurring. Certain occurrences were mentioned in Missouri filings (green v. Kansas city public library-Waldo branch

USCA 22-2469, green v. Kansas city public library- trails west branch USCA 22-2468, green v. midwest genealogy Center USCA 22-1915, green v. schweitzer brentwood branch library USCA 22-1906).

During the time I began pursuing legal actions, I observed television personnel on several occasions hint at or recommend me being kicked out of my dwelling place or telling me to leave or finding way to coerce or manipulate a situation that would force me to be removed in some instance even bluntly saying or imposing me to get out.

Often During the months of October of 2021 through January of 2022 I would watch a television show or movie through an app such as Hulu (*a Paramount app*), netflix,Peacock or tubi and those actors would appear as guests on talk shows or on late night shows which further indicated that my viewing data was being monitored and tracked, this happened on a few different occasions where movie stars would appear knowing that I had watched there show or movies.

Also while utilizing the respondent Paramounts Hulu app, there would be instances where I would be attempting to view a movie and it would instantly be blocked or the app would crash and I would have to reboot the television and that particular show or movie would no longer be available to watch. This would also happen in instances where I would be browsing shows and movies and watch a few trailers for selection and I would go back in attempts to find this particular movie or show and it would be gone. In doing so these selections would be switched out for alternative customized options that either implemented the likeness of my person, certain scenarios or have a hidden message in show/movie titles. In other instances it was even projected when cable or internet service would end or be disconnected. I also wrote a complaint to the CBS network via their online portal regarding these matters on numerous occasions beginning the week of February 28,2022 and have received no Reply.

On November 8,2022 during the 2022 midterm election results while live on

air, a correspondent conducting result readings began signaling to associates when New Jersey popped on the screen; As if to alert of at the time a few recently new filings I had in New Jersey district court;further showing how the respondent has used its Network to out source, collect and pass along information and furthermore the negligence. Also During the November 2022 Midterm elections it is shown how employees of the Respondent Paramount conversed speaking directly and indirectly while live on air regarding my person and intent; Another reporter heard and recognized what was being said in retrospect to the allegations outlined in pro se proceedings and shouting out and I quote "It's True." After these actions being acknowledged it was stated by a female reporter mentioned previously in incidents on CBS morning in 2020 had attempted to address this issue of the ongoing privacy breach, stating and I Quote " I Tried."

I submitted a complaint to The Department of Consumer affairs in September 15 of 2022. On february 14,2023 While standing in a hallway of the downtown cosentino's market in Kansas city, mo; Fox4 morning news was on the lobby television and I observed news anchors acknowledging and several forms that they could physically see me while I stood in this area from the hours of 4am until 8am because I had been left stranded because public transit and alternative ride options were unobtainable due to the citywide superbowl celebration causing me to miss a night of work. During this time I also observed a weather anchor in tears after coming back from commercials while conversing with another news anchor while on air. Following this incident the next day on February 15, 2023 (the day of the Kansas city Chiefs Super bowl parade) I entered a convenience store after my night shift stranded again because public transit was not available. I seen and heard tv personnel of the fox4 news station openly say that I got off work at 9am while live on air, Further proving that I could be seen through the television, tabs were being kept on my person and personal information was being disbursed to the masses while conducting daily live airings of the news and was happening across several networks.

Throughout this ordeal Employees of the Respondent would do or say certain things and use monitoring capabilities to observe my reactions as a way of studying my person or as a method of phishing. This could also be observed when viewing a television program and I would become uncomfortable and would attempt to look at a specific area to avoid eye contact and the television personality would then acknowledge the direction or area I was looking in. Why should a person have to do this to simply view a show?

On numerous occasions throughout this time I have been referred to as 4 or referenced to a cow(cash cow) or horse(gifthorse) amongst other things; in retrospect to revenue accumulated by or from intellectual property or findings stolen and used, personal inspired ideas and or production material used or implemented in various ways throughout the entertainment industry as a whole; rather for boosted ratings, for profit, unfair business practices, career advancement or to simply cause malice, humiliation and avoid /evade recourse.

II. The United States Court of Appeals second Circuit Ruled the Case be dismissed because it "lacks an arguable basis either in law or in fact." Neitzke v. Williams, 490 U.S. 319, 325 (1989); see 28 U.S.C. § 1915(e)(2)(B).

What is electronic surveillance?

Electronic surveillance is a broad term used to describe when someone watches another person's actions or monitors a person's conversations without his/her knowledge or consent by using one or more electronic devices or platforms. In a relationship where there is domestic violence or stalking, an abuser may use recording and surveillance technology to "keep tabs" on you (the victim) by monitoring your whereabouts and conversations. The motive for using electronic surveillance may be to maintain power and control over you, to make it hard for you to have any privacy or a life separate from the abuser, and/or to try to discover (and stop) any plans you may be making to leave the abuser. Electronic surveillance can be done by misusing cameras, recorders, wiretaps, social media, or email. It can also include the misuse of monitoring software (also known as spyware), which can be installed on a computer, tablet, or a smartphone to secretly monitor the device activity without the user's knowledge. Spyware can allow the abusive person access to everything on the phone, as well as the ability to intercept and listen in on phone calls.

If the person is not part of the activity or conversation: There are several criminal laws that address the act of listening in on a private conversation, electronically recording a person's conversation, or videotaping a person's activities. The names of these laws vary across the country, but they often

include wiretap, voyeurism, interception, and other recording laws. When deciding which law(s) may apply to your situation, this may often depend on the circumstances of the surveillance and whether you had a “reasonable expectation of privacy” while the abuser recorded or observed you. Legally, a reasonable expectation of privacy exists when you are in a situation where an average person would expect to not be seen or spied on.¹ For example, a person in certain public places such as in a football stadium or on a main street may not reasonably have an expectation of privacy, but a person in his/her bedroom or in a public restroom stall generally would.

1See Katz v. United States, 389 U.S. 347 (1967) (noting that “what a person knowingly exposes to the public, even in his own home or office, is not a subject of Fourth Amendment protection. But what he seeks to preserve as private, even in an area accessible to the public, may be constitutionally protected.”)

INVASION OF PRIVACY / VOYEURISM

Invasion of privacy laws can apply to situations where an abuser misuses technology, such as a surveillance device, in order to observe, monitor, or record your personal or private activities. This may include taking nude or partially nude photos or videos without your consent. It can also include when an intimate partner secretly videotapes sexual acts without the consent of his/her partner. Voyeurism refers to the act of spying on someone for sexual pleasure. Voyeurism does not always include videotaping or the use of electronic devices (it may apply to physically spying on someone), but the act of videotaping your sexual activity (or nudity) without your consent and knowledge could fall under the crime of voyeurism if there is no “invasion of privacy” law in your state.

- *On several occasions during the 2022 NFL season sports anchors would make references to my person while live on air in regards to me showering etc. or make indirect comments towards private areas, hinting that my bathing habits were also being monitored.*

What is spyware?

Spyware is monitoring software that can be used to secretly monitor a device's activity without the user's knowledge. Spyware can be installed on a:

- computer;
- tablet;
- smartphone; or
- other devices.

Spyware can allow an abuser access to everything on your device, as well as the ability to record and listen in on phone calls or other communications. Spyware software may be hidden on a device, and generally does not give a notification that the software has been installed or is in use. It can be hard to find spyware once it is installed and also hard to remove from a device.

- *From 2020 up to and throughout the present year of 2023 it was and has been acknowledged on numerous occasions and shown in several instances that these*

methods were used by The Respondent Paramount and its counterparts either through assisting in the act of, participating and or encouraging its viewing network to engage in these activities.

- *It is also shown how these methods were used while using public library computers (ref. (green v. Kansas city public library-Waldo branch USCA 22-2469, green v. Kansas city public library- trails west branch USCA 22-2468, green v. midwest genealogy Center USCA 22-1915, green v. schweitzer Brentwood branch library USCA 22-1906).*

- *It was also shown how these methods were used to control, intercept, interrupt and disconnect mobile services as well.*

Sec. 250.45

Unlawful Surveillance in the Second Degree

A person is guilty of unlawful surveillance in the second degree when:

1. For his or her own, or another person's amusement, entertainment, or profit, or for the purpose of degrading or abusing a person, he or she intentionally uses or installs, or permits the utilization or installation of an imaging device to surreptitiously view, broadcast or record a person dressing or undressing or the sexual or other intimate parts of such person at a place and time when such person has a reasonable expectation of privacy, without such person's knowledge or

consent;

- *The petitioner stated on several occasions that the surveillance and monitoring of his person was non consensual and that he was “Not Ok with this”.*

2. For his or her own, or another individual's amusement,

entertainment, profit, sexual arousal or gratification, or for the purpose of degrading or abusing a person, the actor intentionally uses

or installs or permits the utilization or installation of an imaging device to surreptitiously view, broadcast, or record such person in an identifiable manner:

- For the purposes of this subdivision, when a person uses or installs, or permits the utilization or installation of an imaging device in a bedroom, changing room, fitting room, restroom, toilet, bathroom, washroom, shower or any room assigned to guests or patrons in a hotel, motel or inn, there is a rebuttable presumption that such person did so for no legitimate Purpose; or Without the knowledge or consent of a person,

- at a place and time when such person has a reasonable expectation of privacy, without such person's knowledge or consent.

Unlawful surveillance in the second degree is a class E felony

- *Methods of surveillance were used in many ways for exploitation purposes, as well as amusement and defamation. Throughout the course of this issue it has been shown how The respondent and its counterparts used surveillance footage to harass, humiliate and entertain its viewing audience.*
- *These findings were also used to inspire show criteria and the creation and innovation of new revenue streams such as new shows and ideas spawning from movies, shows, health innovation, implemented into the marketing and advertising of products etc..*

Non-consensual monitoring and surveillance of someone

-Installation of Viewing Device

- *This element means that you either physically installed a viewing device yourself, or had someone install a viewing device on your behalf. A key part of this element is that you installed this viewing device without providing notice or obtaining the consent of the viewer or recorded person.*

- This method of concealed surveillance, monitoring and data tracking was unknown to the appellant until television personnel alerted the petitioner of this matter showing that this was unknown and non consensual. The petitioner made several attempts to alert networks/broadcasters of the monetary issue and was ignored and the problem was neglected. The petitioner also reached out to consumer affairs regarding the monitoring and data problem and still saw no resolution. In 2022 the appellant reached out personally to the Respondent Paramount and still received no response.

-The respondent Paramount was aware of multiple viewing devices that were used to surveil and monitor the petitioner including in private dwelling place(s) including surveillance methods through television electronic capabilities and neglected to address such issues even after being notified by the appellant personal as well as through legal proceedings.

- While acknowledging monitoring capabilities through television. As the petitioner was inbetween living spaces in 2021 and moved between different residences in 2022 it was acknowledged that other forms of surveillance was being used to maintain constant viewing of his person and daily habits which confirm several forms of stalking and assisted, encouraged and the participation in the act of tracking and controlling one's movement without consent for ulterior motives.

Viewing the sexual/intimate areas of a person

- This element means that the viewing or recording device was set up in a place where people would be undressing and/or engaging in sexual acts with the assumption of privacy. It is important to note that it does not matter why the viewing or recording device was set up, or what motivated the person viewing or recording the footage.

- Throughout the course of this ordeal there were mentions of actions done while bathing or in the bathroom of my dwelling place. Which also confirms that some form of surveillance was in this area as well. Which also indicated invasion of privacy violations. This also was true for instances in the petitioners

bedroom as well.

Reasonable Privacy

- *The definition of Element 3 is the installation of the viewing device in a place where the viewer or recorded person had a reasonable expectation of privacy.*
- *This element means that the viewing or recording device was set up in a place where the recorded person felt that they could undress privately. This includes private residences, but also places that are generally expected to be private, such as bathrooms and changing rooms.*

S 250.55, which covers the dissemination of an unlawful surveillance image in the second degree. This covers intentionally distributing an image that was obtained through unlawful surveillance, as defined above.

S 250.60 It applies to anyone who is convicted of disseminating unlawful surveillance images more than once in a ten year period. This applies to any time an image or video that was knowingly obtained through unlawful surveillance changes hands between two or more people. Any time you share, post, or otherwise spread the image, and you are liable for the dissemination of unlawful surveillance images.

Eavesdropping

-The definition of eavesdropping is intentionally overhearing or recording a conversation without consent, by means of a mechanical device.

Eavesdropping means any time that you intentionally access a private conversation between two or more people. This can mean the interception of electronic communications, like emails, texts, or phone calls, but it can also refer to recording conversations two people have in person with a reasonable expectation of privacy.

- Since 2020 up to the present year of 2023, there has been a constant and gradual chain of events that show that several methods were used to carry out the act of eavesdropping. It was stated on numerous occasions that the monitoring of my person has been occurring unknowingly for an additional 10-12 years.

Through this malfunction the appellee has enabled assailants/oppressors to carry out countless acts of malice that has undoubtedly affected and in many ways impacted and altered the course of my life.

- On countless occasions tv personnel openly exhibited how numerous methods of eavesdropping were executed while taking advantage of this neglected television malfunction. Through this monetary method tv personnel were able openly view the respondents personal life at their leisure, openly broadcast these personal findings to multiple viewing networks, openly intrude on private matters by encouraging scenarios, recommending and insisting actions. Through this electronic error the petitioner was individually targeted, controlled and eavesdropping and spyware were used to gather insight and avoid recourse. Through this, unlimited access which has accumulated profit in numerous ways and has been used to manipulate outcomes in their favor and gradually gain and obtain electronic control through study trial and error.

- Since 2020 up to the present year 2023, the respondent Paramount and its counterparts have assisted, participated as well as encouraged the act of Eavesdropping in numerous various scenarios. This has been shown by distributing illegally gathered information throughout its viewing audiences/network through direct communication, repeating verbatim specific incidents, show criteria and data transmissions.

- This information was shown to be used for intentional malice towards the petitioner.

Aggravated Harassment in the Second Degree

-Aggravated harassment in the second degree is communicating with the intent to threaten, to such an extent that another person would reasonably fear for their safety, the safety of their property, or the safety of their family members.

-In this context, aggravated harassment could be charged if an image obtained through unlawful surveillance is used to threaten harm. This could include threatening the livelihood of a person.

• *For over 3 years non consensually the petitioner has endured tv personalities openly viewing his person in real time, mocking, jokes, violations of the privacy in the sanctity of his own home, the gathering and collection of his daily habits which has caused*

tremendous hardship in everyday things such as shopping, stable employment, constant compromises to social media, mobile devices and financials, numerous retaliation acts, the constant ridicule from network followings for attempting to pursue legal recourse to resolve this issue that has been concealed and hidden. Through this manufacturing error this ongoing surveillance has also affected health, relationships, family matters, social stature, business and career.

• *The respondent Paramount and its counterparts held discussions about projected and preplanned expiration dates in regards to my person while live on air. While exhibiting other abusive behavior and harassing misconduct such as scenarios or hints at methods and plots of retaliation.*

• *This harassment also included affecting financial standings through orchestration of interruption in employment, causing financial strain and potential loss of opportunity or endeavors.*

- *The harassment I endured also affected my mental and emotional health with comments like He's Delusional, crazy, stating that I would need therapy, He's a bitch, He's not going to do anything.*
- *Also by disconnecting me from local viewing programs in attempts to cover up actions instead of addressing incidents, made me feel single out and purposely targeted.*
- *By the respondent participating and encouraging the act of monitoring shopping and culinary choices placed strain on my physical health and caused food safety issues which ultimately deprived me of proper nutrition due to limitations and controlling food choices in my shopping area. This ordeal proved to be time consuming, aided in encouraging the act of price gouging, the manipulation of or limited shopping options as a form of sovereignty*

Unethical human experimentation

- *Counterparts of the Appellee Paramount would often mention several forms of genetic modification.*
- *It is shown how the monitoring of the petitioner's shopping and culinary choices led to issues with food safety which affected specific areas of his body.*

While enduring these hardships it was shown to be acknowledged by Employees of the respondent Paramount while live on air that it was happening by mentions of food or areas of the body or actions. These food safety occurrences were also documented through state health complaint portals. By the careful monitoring and studying efforts of shopping choices it was shown how this data was then used to predict and control/limit the petitioner's diet.

Impactful Cases

There are several impactful cases when it comes to unlawful surveillance.

- In 2007, Peter Barta, a public defender at the Legal Aid Society, was charged with taking video footage of his female coworkers while they were undressing. He was ultimately convicted of the felony charge (unlawful surveillance in the second degree) and disbarred.

- Another high-profile case happened in 2013. Colgate University student Michael J. Piznarski had a sexual encounter with a woman which he secretly recorded. He then threatened to publicly release the recording if the woman didn't have sex with him again. Ultimately, she relented, and he secretly recorded that encounter as well. The woman went to the police, and an investigation and trial 27 proceeded. Piznarski was convicted, among other things, of two counts of unlawful surveillance in the second degree. He was sentenced to 1-3 years in prison and permanently placed on the sex offender registry.

Terms of Use

- While reaching out to The respondent Paramount network via email, online submission portal as well as the US postage mailing services as well as alerting them of this issue through small claim pro se lawsuit, I still received no response from the respondent Paramount. In each complaint submitted via the respondents online complaint portal a description was given of the arising issue as well as personal and contact information. Through court filings again a full description of incidents occurring were given as well as contact information and signed signature with a certificate of service that this information was sent to the respondent Paramount and/or its counterparts. In there update “Terms of use” policy it states:

2.1 Mandatory Pre-Arbitration Notice and Informal Dispute

Resolution Procedure. Before a party commences an arbitration or files a small claims court action with respect to a Claim, the party must first send to the other a written notice of dispute ("Notice"). A Notice from you to us must: (1) be sent by certified mail; (2) be addressed to: Viacom International Inc., 1515 Broadway, New York, NY 10036 Attn: General Counsel (the "Notice Address"); (3) contain your name, address, and email address; (4) describe the nature and basis of your Claim; (5) if you are submitting the Notice, Include any relevant facts

regarding your use of the Services, including without limitation whether you have created an account; (6) specify the nature and basis of the specific relief sought, including the damages sought, if any, and a detailed calculation of them; and (7) include a personally signed statement from you (and not your agent, attorney or anyone else purporting to act on your behalf) verifying the accuracy of the contents of the Notice. The Notice must be individualized, meaning it can concern only your dispute and no other person's dispute. (this was also in the updated terms of use page which came into effect February 14,2023.)

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- While I have **NOT** received any formal or informal response from the appellee Paramount nor its Counterparts since reaching out through email and postal written letter. I have however observed employees of the Appellee Paramount acknowledging on multiple occasions that these complaints were received through conversation on airings of shows and television programs. (Ref. *CBS Sports 2021 nfl season*)

https://www.paramount.com/sites/g/files/dxjhpe226/files/2022-10/English_Paramount_Global_Business_Conduct_Statement.pdf

The “American Data Privacy and Protection Act (ADPPA) Federal Consumer Online Privacy Rights” for instance, prove to be clearly violated in many ways such as the Consumer Privacy Protection Act of 2017, This bill amends the federal criminal code to make it a crime to intentionally and willfully conceal knowledge of a security breach that results in economic harm of at least \$1,000 to any individual. These neglected actions have led to escalated matters that the defendant Paramount can now not control which is why they are in fact liable.

- *The respondent denied claims and stated that there was a contract that made the monitoring and exploitation of my person permissible. In this*

suit I clearly show that I did not give consent nor did I enter into any form of agreement with the respondent. Even after contacting consumer affairs as well as the respondent personally these actions still continued without being addressed. It was even stated that "The best way to deal with situations like this is to do nothing at all and let them take care of themselves". Further showing the respondent Paramounts negligence.

Reasons For Granting the Writ

The court should grant Writ of Certiorari in this case because Paramount abused its media power by using unconventional methods within its network to carry out organized plots and racketeer influenced acts.

The court should grant review in this case to oversee lawful integrity, examine factual findings that further exhibit a collective working in regards to relative cases regarding similar incidents. Weighing whether these actions were intentional and meant to target and cause unforeseen hardship and/or Malice to the petitioner. Furthermore, to examine the question of how this breach in privacy happened, why the petitioner is being targeted and lastly why after 3 years and after numerous warnings from employee personnel as well as the petitioner has the respondent nor any of its counterparts of partnerships neglected to come forth to acknowledge the situation or work to end this electronic breach, With no response to complaints from The petitioner nor attempts to find a way to end the surveillance and correct behavior, these neglected actions have led to escalated matters that the respondent Paramount can now not control which is why they are in fact liable. The United States court of appeals for the second circuit ruled on August 16, 2023 that appeal 23-279 Green v. Paramount be dismissed due to lack of an arguable basis either in law or in fact. It is argued that the breach in the television was

used as a platform to carry out continued uncontrollable malice towards the appellant as well as other ulterior motives such as using television electronic capabilities as well as taking advantage of other surveillance vulnerabilities to *Aid in the concealed act of Racketeering, Exploitation; defamations of one's*

character etc. No contractual agreement was made between the petitioner and the respondent, nor was there any form of compensation for the time (3 years and counting) the appellant has endured this; Whereas employees of the respondent Paramount are compensated for their time on air as employees of the entertainment and media industry labeled as anchors, reporters, sports commentators, musicians, television personnel etc. The petitioner on the other hand carries none of these labels nor is employed by any television organization. The petitioner is a consumer, one that views the content that is provided by the appellee Paramount for entertainment purposes. Action committed by staff of the respondent Paramount violate both company policies as well as laws, statutes and network regulations. By unconventionally using data and spyware capabilities the appellee violates several privacy laws and constitutional rights. Without having a formal proceeding, and solely basing a final decision on briefs and documents submitted by the appellant, enables the ability to prevent the respondent Paramount from having to take responsibility and confirm facts and/or examine the integrity of its company and staff pertaining to rules of professional conduct.

With this in mind, after all of the examples provided of how the respondent as well as others were in violation in many ways of laws, statutes and company policy and regulations; the chief judge of United states district court of new york as well as the court of appeals for the second circuit jointly conclude concluded:

*On 02/23/2023 an order of Dismissal was issued By Honorable Judge Taylor Swain

in regards to *28 U.S.C. SECTION 1651*: The Court dismisses this action as frivolous. 28 U.S.C. § 1915(e)(2)(B)(i). The Court therefore denies Plaintiff's requests for the issuance of subpoenas. The Court also directs Plaintiff to show cause by declaration, within 30 days of the date of this order, why the Court should not bar Plaintiff from filing any further civil action in this court without first obtaining permission from the court to do so. A declaration form is attached to this order, which Plaintiff should complete as specified. The Court

certifies under 28 U.S.C. § 1915(a)(3) that any appeal from this order would not be taken in good faith, and therefore in forma pauperis status is denied for the purpose of an appeal. See *Coppedge v. United States*, 369 U.S. 438, 444-45 (1962).

*MANDATE of USCA (Certified Copy) as to [10] Notice of Interlocutory Appeal filed by Courtney Green. USCA Case Number 23-0279. Appellant, pro se, moves for

leave to proceed in forma pauperis, appointment of counsel, and other relief. Upon due consideration, it is hereby ORDERED that the motions are DENIED and the appeal is DISMISSED because it "lacks an arguable basis either in law or in fact." Neitzke v. Williams, 490 U.S. 319, 325 (1989); see 28 U.S.C. § 1915(e)(2)(B).

Appellant has filed a number of other matters that have been dismissed as meritless by this Court within the past year. See, e.g., Green v. Kelly and Ryan Show, 2d Cir. 22-726, Doc. 27; Green v. Fox Corp., 2d Cir. 22-898, Doc. 30; Green v. ABC Ent. Inc., 2d Cir. 22-899, Doc. 23. Accordingly, Appellant is hereby warned that the continued filing of duplicative, vexatious, or clearly meritless appeals, motions, or other papers could result in the imposition of a sanction that would require Appellant to obtain permission from this Court prior to filing any further submissions in this Court (a "leave-to-file" sanction). See In re Martin-Trigona, 9 F.3d 226, 229 (2d Cir. 1993); Sassower v. Sansverie, 885 F.2d 9, 11 (2d Cir. 1989) (per curiam).. Catherine O'Hagan Wolfe, Clerk USCA for the Second Circuit. Issued As Mandate:

09/15/2023..(nd)

***BAR ORDER UNDER 28 U.S.C. § 1651:** The Court hereby bars Plaintiff from filing any further civil action in this court without first obtaining permission from the court to do so. See 28 U.S.C. § 1651. Plaintiff must attach a copy of her

proposed complaint and a copy of this order to any motion seeking leave to file. The motion must be filed with the Pro Se Intake Unit of this court. If Plaintiff violates this order and files an action without filing a motion for leave to file, the court will dismiss that action for failure to comply with this order. The Court warns Plaintiff that the continued submission of frivolous documents may result in the imposition of additional sanctions, including monetary penalties. See *id.*

The Court certifies, pursuant to 28 U.S.C. § 1915(a)(3), that any appeal from this order would not be taken in good faith and therefore IFP status is denied for the purpose of an appeal. Cf. *Coppedge v. United States*, 369 U.S. 438, 444-45

action, pursuant to Court's February 23, 2023 order, and barring Plaintiff from filing any further civil action in this court without first obtaining permission from the court to do so, pursuant to this order. SO ORDERED. (Signed by Judge Laura Taylor Swain on 11/06/2023) (ama)

CIVIL JUDGMENT: For the reasons stated in the November 6, 2023, order,

this action is dismissed. The Court certifies under 28 U.S.C. § 1915(a)(3) that any appeal from the Court's judgment would not be taken in good faith. SO ORDERED. (Signed by Judge Laura Taylor Swain on 11/06/2023) (ama)

A motion to reconsider along with motions to expand the record were submitted and denied as well as a motion to vacate order of dismissal.

As a consumer The United States has various consumer privacy acts that are put in place as data protection laws. The "American Data Privacy and Protection Act (ADPPA) Federal Consumer Online Privacy Rights" for instance, prove to be clearly violated in many ways such as the Consumer Privacy Protection Act of 2017, This bill amends the federal criminal code to make it a crime to intentionally and willfully conceal knowledge of a security breach that results in economic harm of at least \$1,000 to any individual. Since the year 2020 it has been described how methods have been used to derail and control career and financial advancement. While it has been shown and proven that the respondent Paramount knowingly took advantage of spyware and data hacking methods that has resulted in hardship, pain and suffering towards the petitioner and furthermore has been exploited through television content while all allegations have been denied and made out to be frivolous. While the docket entries show several submissions from the appellant, The case has been decided without the courts even requesting a response to the argument presented towards the respondent Paramount. Though subpoenas were issued for review of many entertainment segments where said incidents occurred in the instance allegations were denied as standard cause for investigative examination/due cause (under rule 11); The petitioner has laid a basis for factual incidents and laws violated, even if the appellant fails to correctly state the precise laws, rules and statutes violated but gives sufficient accounts of incidents that due in fact violate rules, regulations, laws and statutes regarding such matters; Is it not the courts duty or give valid reason to acknowledge laws that are violated based on the jurisdiction of the subject matter?(rule 2.2) (Fed.R.civilProc.

12(b)(1) Through the constant invasion and intrusion of the appellants privacy, the respondent Paramount has exhibited acts of sovereignty, unlawful Surveillance, voyeurism, eavesdropping, exploitation, malice and The participation in racketeering influenced acts and other corrupt intent.

Relief

Injunctive Relief in the amount of \$175,000,000.00

- Pain and suffering
- Theft of intellectual property
- Eavesdropping, use of spyware and and other monetary actions
- Encouraging the act of stalking
- Intrusion of privacy
- Compromising personal and business affairs leading to leaked trade secrets, unfair business practices, unjust enrichment.
- Voyeurism
- Abuse of power
- Professional misconduct
- Harassment
- Malice
- Violation of the privacy consumer act
- Violation of the electronic data act
- Violation of the consumer data act
- Exploitation
- Racketeer influenced activity
- Abusive misconduct

- Mental abuse and emotional distress
- Defamation and assasination of one's character
- retaliation
- The petitioner Request a written and signed apology from the respondent Paramount and all its counterparts involved.

United States Court of Appeals
FOR THE
SECOND CIRCUIT

At a stated term of the United States Court of Appeals for the Second Circuit, held at the Thurgood Marshall United States Courthouse, 40 Foley Square, in the City of New York, on the 16th day of August, two thousand twenty-three.

Present:

Joseph F. Bianco,
Eunice C. Lee,
Sarah A. L. Merriam,
Circuit Judges.

Courtney Green,
Plaintiff-Appellant,

v.

23-279

Paramount,
Defendant-Appellee.

Appellant, pro se, moves for leave to proceed in forma pauperis, appointment of counsel, and other relief. Upon due consideration, it is hereby ORDERED that the motions are DENIED and the appeal is DISMISSED because it "lacks an arguable basis either in law or in fact." *Neitzke v. Williams*, 490 U.S. 319, 325 (1989); *see* 28 U.S.C. § 1915(e)(2)(B).

Appellant has filed a number of other matters that have been dismissed as meritless by this Court within the past year. *See, e.g., Green v. Kelly and Ryan Show*, 2d Cir. 22-726, Doc. 27; *Green v. Fox Corp.*, 2d Cir. 22-898, Doc. 30; *Green v. ABC Ent. Inc.*, 2d Cir. 22-899, Doc. 23. Accordingly, Appellant is hereby warned that the continued filing of duplicative, vexatious, or clearly meritless appeals, motions, or other papers could result in the imposition of a sanction that would require Appellant to obtain permission from this Court prior to filing any further submissions in this Court (a "leave-to-file" sanction). *See In re Martin-Trigona*, 9 F.3d 226, 229 (2d Cir. 1993); *Sassower v. Sansverie*, 885 F.2d 9, 11 (2d Cir. 1989) (per curiam).

FOR THE COURT:
Catherine O'Hagan Wolfe, Clerk of Court

Catherine O'Hagan Wolfe


**UNITED STATES COURT OF APPEALS
FOR THE
SECOND CIRCUIT**

At a Stated Term of the United States Court of Appeals for the Second Circuit, held at the Thurgood Marshall United States Courthouse, 40 Foley Square, in the City of New York, on the 8th day of September, two thousand twenty-three,

Present: Joseph F. Bianco,
Eunice C. Lee,
Sarah A. L. Merriam,

Circuit Judges,

Courtney Green,

Plaintiff - Appellant,

v.

Paramount,

Defendant - Appellee.

ORDER

Docket No. 23-279

Appellant Courtney Green filed a motion for reconsideration and the panel that determined the motion has considered the request.

IT IS HEREBY ORDERED, that the motion is denied.

For The Court:

Catherine O'Hagan Wolfe,
Clerk of Court


Catherine O'Hagan Wolfe

United States Court of Appeals
FOR THE
SECOND CIRCUIT

At a stated term of the United States Court of Appeals for the Second Circuit, held at the Thurgood Marshall United States Courthouse, 40 Foley Square, in the City of New York, on the 16th day of August, two thousand twenty-three.

Present:

Joseph F. Bianco,
Eunice C. Lee,
Sarah A. L. Merriam,
Circuit Judges.

Courtney Green,
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23-279

Paramount,
Defendant-Appellee.

Appellant, pro se, moves for leave to proceed in forma pauperis, appointment of counsel, and other relief. Upon due consideration, it is hereby ORDERED that the motions are DENIED and the appeal is DISMISSED because it "lacks an arguable basis either in law or in fact." *Neitzke v. Williams*, 490 U.S. 319, 325 (1989); *see* 28 U.S.C. § 1915(e)(2)(B).

Appellant has filed a number of other matters that have been dismissed as meritless by this Court within the past year. *See, e.g., Green v. Kelly and Ryan Show*, 2d Cir. 22-726, Doc. 27; *Green v. Fox Corp.*, 2d Cir. 22-898, Doc. 30; *Green v. ABC Ent. Inc.*, 2d Cir. 22-899, Doc. 23. Accordingly, Appellant is hereby warned that the continued filing of duplicative, vexatious, or clearly meritless appeals, motions, or other papers could result in the imposition of a sanction that would require Appellant to obtain permission from this Court prior to filing any further submissions in this Court (a "leave-to-file" sanction). *See In re Martin-Trigona*, 9 F.3d 226, 229 (2d Cir. 1993); *Sassower v. Sansverie*, 885 F.2d 9, 11 (2d Cir. 1989) (per curiam).

FOR THE COURT:
Catherine O'Hagan Wolfe, Clerk of Court

Catherine O'Hagan Wolfe


United States Court of Appeals
FOR THE
SECOND CIRCUIT

At a stated term of the United States Court of Appeals for the Second Circuit, held at the Thurgood Marshall United States Courthouse, 40 Foley Square, in the City of New York, on the 15th day of August, two thousand twenty-three.

Present:

Joseph F. Bianco,
Eunice C. Lee,
Sarah A. L. Merriam,
Circuit Judges.

Courtney Green,
Plaintiff-Appellant,

v.

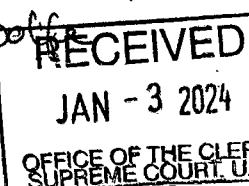
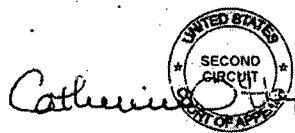
23-279

Paramount,
Defendant-Appellee.

Appellant, pro se, moves for leave to proceed in forma pauperis, appointment of counsel, and other relief. Upon due consideration, it is hereby ORDERED that the motions are DENIED and the appeal is DISMISSED because it "lacks an arguable basis either in law or in fact." *Neitzke v. Williams*, 490 U.S. 319, 325 (1989); *see 28 U.S.C. § 1915(e)(2)(B)*.

Appellant has filed a number of other matters that have been dismissed as meritless by this Court within the past year. *See, e.g., Green v. Kelly and Ryan Show*, 2d Cir. 22-726, Doc. 27; *Green v. Fox Corp.*, 2d Cir. 22-898, Doc. 30; *Green v. ABC Ent. Inc.*, 2d Cir. 22-899, Doc. 23. Accordingly, Appellant is hereby warned that the continued filing of duplicative, vexatious, or clearly meritless appeals, motions, or other papers could result in the imposition of a sanction that would require Appellant to obtain permission from this Court prior to filing any further submissions in this Court (a "leave-to-file" sanction). *See In re Martin-Trigona*, 9 F.3d 226, 229 (2d Cir. 1993); *Sassower v. Sansverie*, 885 F.2d 9, 11 (2d Cir. 1989) (per curiam).

FOR THE COURT:
Catherine O'Hagan Wolfe, Clerk of Court



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

COURTNEY GREEN,

Plaintiff,

-against-

PARAMOUNT,

Defendant.

1:23-CV-0535 (LTS)

BAR ORDER UNDER
28 U.S.C. § 1651

LAURA TAYLOR SWAIN, Chief United States District Judge:

By order dated February 23, 2023, the Court dismissed this *pro se* action as frivolous. (ECF 8.) The Court also directed Plaintiff to show cause by declaration, within 30 days of the date of that order, why the Court should not bar Plaintiff from filing any further civil action in this court without first obtaining permission from the court to do so. (*Id.*) On February 27, 2023, Plaintiff filed a declaration in response to the Court's February 23, 2023 order. (ECF 9.) On March 2, 2023, Plaintiff filed a notice of appeal, a motion for leave to proceed *in forma pauperis* ("IFP") on appeal, an application to appeal IFP, and an application for the Court to request *pro bono* counsel. (ECF 10.) By order dated April 5, 2023, the Court construed Plaintiff's notice of appeal as a timely filed application to file an interlocutory appeal of the Court's February 23, 2023 order, and the Court denied Plaintiff's motion for leave to proceed IFP on appeal, her application to appeal IFP, and her application for the Court to request *pro bono* counsel. (ECF 11.) On August 16, 2023, the United States Court of Appeals for the Second Circuit dismissed Plaintiff's appeal as frivolous, and warned Plaintiff "that the continued filing of duplicative, vexatious, or clearly meritless appeals, motions, or other papers could result in the imposition of a sanction that would require [her] to obtain permission from [that court] prior to filing any

further submissions in [that court] (a “leave-to-file” sanction).” *Green v. Paramount*, No. 23-279 (2d Cir. Aug. 16, 2023).

Plaintiff’s arguments against the imposition of the abovementioned filing injunction by this Court that are contained in her declaration are insufficient. Accordingly, the Court will issue that filing injunction.

CONCLUSION

The Court hereby bars Plaintiff from filing any further civil action in this court without first obtaining permission from the court to do so. *See* 28 U.S.C. § 1651. Plaintiff must attach a copy of her proposed complaint and a copy of this order to any motion seeking leave to file. The motion must be filed with the Pro Se Intake Unit of this court. If Plaintiff violates this order and files an action without filing a motion for leave to file, the court will dismiss that action for failure to comply with this order.

The Court warns Plaintiff that the continued submission of frivolous documents may result in the imposition of additional sanctions, including monetary penalties. *See id.*

The Court certifies, pursuant to 28 U.S.C. § 1915(a)(3), that any appeal from this order would not be taken in good faith and therefore IFP status is denied for the purpose of an appeal. *Cf. Coppedge v. United States*, 369 U.S. 438, 444-45 (1962).

The Court directs the Clerk of Court to enter a judgment dismissing this action, pursuant to Court's February 23, 2023 order, and barring Plaintiff from filing any further civil action in this court without first obtaining permission from the court to do so, pursuant to this order.

SO ORDERED.

Dated: November 6, 2023
New York, New York

/s/ Laura Taylor Swain

LAURA TAYLOR SWAIN
Chief United States District Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

COURTNEY GREEN,

Plaintiff,

-against-

PARAMOUNT,

Defendant.

1:23-CV-0535 (LTS)

ORDER OF DISMISSAL
AND TO SHOW CAUSE
UNDER 28 U.S.C. § 1651

LAURA TAYLOR SWAIN, Chief United States District Judge:

Plaintiff Courtney Green, a citizen of Missouri, who is appearing *pro se*, filed this action invoking the court's diversity jurisdiction. She sues Paramount, which she alleges is a citizen of New York. Plaintiff seeks \$175,000,000 in damages, as well as other relief. She describes her claims as “[d]efamation of [c]haracter, slander, malice, invasion of privacy through the disclosure of private facts and intrusion of solitude, theft of intellectual property and unfair business practices, electronic communications privacy act, stored communications privacy act, consumer privacy protection act, cyber security information sharing act, exploitation, racketeering etc.” (ECF 2, at 2.) Plaintiff requests the issuance of subpoenas.

By order dated January 24, 2023, the Court granted Plaintiff's request to proceed *in forma pauperis* (“IFP”), that is, without prepayment of fees. For the reasons set forth below, the Court dismisses this action as frivolous, and directs Plaintiff to show cause by declaration why the Court should not bar Plaintiff from filing any new civil action in this court without prior permission of the court.

STANDARD OF REVIEW

The Court must dismiss an IFP complaint, or any portion of the complaint, that is frivolous or malicious, fails to state a claim on which relief may be granted, or seeks monetary

relief from a defendant who is immune from such relief. 28 U.S.C. § 1915(e)(2)(B); *see Livingston v. Adirondack Beverage Co.*, 141 F.3d 434, 437 (2d Cir. 1998). The Court must also dismiss a complaint when the Court lacks subject matter jurisdiction of the claims raised. *See Fed. R. Civ. P. 12(h)(3)*. While the law mandates dismissal on any of these grounds, the Court is obliged to construe *pro se* pleadings liberally, *Harris v. Mills*, 572 F.3d 66, 72 (2d Cir. 2009), and interpret them to raise the “strongest [claims] that they suggest,” *Triestman v. Fed. Bureau of Prisons*, 470 F.3d 471, 474 (2d Cir. 2006) (internal quotation marks and citations omitted, emphasis in original).

BACKGROUND

Plaintiff alleges that, between May 8, 2020, and the present, Paramount has been carrying out “non consensual monitoring and studying of [her] daily habits for ulterior motive[s].” (ECF 5.) She also alleges that Paramount employees have been “able to secretly obtain television information such as mode Upc and other codes to track and collect viewing data and manipulate and control viewing capabilities as well as limit viewing options on numerous occasions through the misuse of company resources.” (*Id.*) Plaintiff further alleges that “[t]he Walt Disney Company [was] able to conceal the act of exploitation, defamation and facilitate the exchange of information to the masses for the purpose of malice and slander towards [her] therefore aiding in the act of racketing.” (*Id.* at 6.) She states that Paramount “exploited/extorted an electronic breach in a television platform/portal to openly monitor, listen, surveil and attempt to converse with [her] through the use of the television device.” (*Id.* at 9.)

As examples of the Paramount’s alleged actions, Plaintiff asserts, among other examples, the following:

[d]uring the CBS morning show between [May 8, 2020, and February 13, 2021,] and [the] hours of 6am-9am[,] anchors acknowledge that they could physically view [Plaintiff] while live on air in various ways such as acknowledging reactions

to conversations and morning stories as well as making jokes and laughing at [Plaintiff] being seen and [her] . . . living situation[]; stating that [Plaintiff] was homeless. During this timeframe[,] [the] CBS morning staff mockingly joked about the ridicule being endured by . . . [P]laintiff[,] which turned out to be secretly organized malice, orchestrated by them and a group of associates. In one instance[,] the CBS Morning host jokingly showed a brief football clip of a team passing the football off laterally before being tackled as an example of what they were doing in real time as they all laughed while [Plaintiff] viewed. During this time[,] there were news stories hinting around things that [Plaintiff] was doing[,] for example[,] business endeavors [she] was pursuing at the time[,] such as a jewelry piece [she] was attempting to create via online[,] which led [her] to believe [her] online browsing was being monitored. . . . One morning[,] while viewing this happening[,] [she] stated out loud “Who do I talk to about this?” Anchors and hosts also conducted interviews and hosted virtual guest appearances where host and guest would make direct and indirect comments about [Plaintiff’s] person while holding discussions; for example[,] in one instance with Tyler Perry[,] comments were made, one in which includ[ed] [Plaintiff] being referred to as a slave. . . .

(ECF 2, at 13.)

Plaintiff seeks \$175,000,000 in damages, and asks the Court to “put[] in place hefty fines and . . . strict rules and laws against this specific misconduct and misuse of media platform[s] and electronic breach[es].” (*Id.* at 6.) She also asks the Court to order the Walt Disney Company “to incorporate into company policy and use agreements rules and regulations against this behavior [and] order . . . Paramount to disable or restrict the capabilities that make secret surveillance possible. . . .” (*Id.*) Plaintiff also seeks “a written and sign[ed] apology from [Paramount] and all of its parties involved.” (*Id.*)

DISCUSSION

The IFP statute, 28 U.S.C. § 1915, “accords judges not only the authority to dismiss a claim based on an indisputably meritless legal theory, but also the unusual power to pierce the veil of the complaint’s factual allegations and dismiss those claims whose factual contentions are clearly baseless.” *Denton v. Hernandez*, 504 U.S. 25, 32 (1992) (internal quotation marks and citation omitted). A finding of factual frivolousness is warranted when the facts alleged are

“clearly baseless,” “fanciful,” “fantastic,” “delusional” or wholly incredible, “whether or not there are judicially noticeable facts available to contradict them.” *Id.* at 32-33; *see Livingston*, 141 F.3d at 437. The Court must not dismiss a complaint, however, simply because the set of facts presented by the plaintiff appears to be “unlikely.” *Denton*, 504 U.S. at 33.

Granting the *pro se* complaint the liberal interpretation that it is due, the Court finds that there is no factual predicate or legal theory on which Plaintiff can rely to state a viable civil claim arising from her allegations and assertions. Plaintiff asserts, in a conclusory manner, that Paramount is surveilling and harassing her in her home, as well as collecting personal information about her, all via her television. These allegations do not support any of Plaintiff’s claims because they are largely irrational or wholly incredible, and provide no facts suggesting that the television-surveillance actions of which she complains are even possible. *See id.* at 32-33; *Livingston*, 141 F.3d at 437. The Court must therefore dismiss this action as frivolous. *See* 28 U.S.C. § 1915(e)(2)(B)(i); *see also Salahuddin v. Cuomo*, 861 F.2d 40, 42 (2d Cir. 1988) (court may dismiss complaint *sua sponte* and without providing leave to amend “where the substance of the claim pleaded is frivolous on its face”).

LITIGATION HISTORY

Plaintiff is no stranger to this court, and this is not the first time that she has brought these types of claims, only to have the Court not only dismiss them *sua sponte* as frivolous, but also to have the Court warn Plaintiff that her continued filing of vexatious or frivolous litigation in this court may result in the court issuing an order, under 28 U.S.C. § 1651(a), barring her from filing any new civil action in this court without the court’s prior permission. *See Green v. NBC Universal Media LLC*, ECF 1:22-CV-0239, 13 (S.D.N.Y. Apr. 4, 2022), *appeal dismissed*, No. 22-722 (2d Cir. May 4, 2022); *Green v. Fox Corp.*, ECF 1:22-CV-0243, 19 (S.D.N.Y. Apr. 4, 2022), *appeal dismissed as frivolous*, No. 22-898 (2d Cir. Oct. 21, 2022); *Green v. ABC Entm’t*

Inc., ECF 1:22-CV-0376, 18 (S.D.N.Y. Apr. 4, 2022), *appeal dismissed as frivolous*, No. 22-899 (2d Cir. Oct. 21, 2022).

By filing this latest frivolous action, Plaintiff disregards the Court's previous warnings as to her continued filing of such actions in this court. Accordingly, the Court directs Plaintiff to show cause by declaration why the Court should not bar her from filing any further civil action in this court without first obtaining permission from this court to file a complaint. *See Moates v. Barkley*, 147 F.3d 207, 208 (2d Cir. 1998) ("The unequivocal rule in this circuit is that the district court may not impose a filing injunction on a litigant *sua sponte* without providing the litigant with notice and an opportunity to be heard."). Plaintiff shall submit to this Court, within 30 days of the date of this order, a written declaration setting forth good cause as to why the Court should not impose such a filing injunction on her. Should Plaintiff fail to submit a declaration within the time directed, or should Plaintiff's declaration fail to set forth good cause why the Court should not impose such a filing injunction, the Court will bar Plaintiff from filing any further civil action in this court without first obtaining permission from the court to do so.

CONCLUSION

The Court dismisses this action as frivolous. 28 U.S.C. § 1915(e)(2)(B)(i). The Court therefore denies Plaintiff's requests for the issuance of subpoenas. The Court also directs Plaintiff to show cause by declaration, within 30 days of the date of this order, why the Court should not bar Plaintiff from filing any further civil action in this court without first obtaining permission from the court to do so. A declaration form is attached to this order, which Plaintiff should complete as specified.

The Court certifies under 28 U.S.C. § 1915(a)(3) that any appeal from this order would not be taken in good faith, and therefore *in forma pauperis* status is denied for the purpose of an appeal. *See Coppedge v. United States*, 369 U.S. 438, 444-45 (1962).

SO ORDERED.

Dated: February 23, 2023
New York, New York

/s/ Laura Taylor Swain

LAURA TAYLOR SWAIN
Chief United States District Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

COURTNEY GREEN,

Plaintiff,

-against-

PARAMOUNT,

Defendant.

1:23-CV-0535 (LTS)

ORDER

LAURA TAYLOR SWAIN, Chief United States District Judge:

By order dated and entered on February 23, 2023, the Court dismissed this action as frivolous and directed Plaintiff, who proceeds *pro se*, to show cause by declaration, within 30 days of the date of that order, why the Court should not bar her from filing any further civil action in this court without first obtaining permission from the court do so. (ECF 8.)

On February 27, 2023, Plaintiff filed a declaration in response to the Court's February 23, 2023, order. (ECF 9.) On March 2, 2023, Plaintiff filed a notice of appeal, a motion for leave to proceed *in forma pauperis* ("IFP") on appeal, an application to appeal IFP, and an application for the Court to request *pro bono* counsel. (ECF 10.) Because the Court directed Plaintiff to show cause why the Court should not impose the abovementioned filing bar, and because Plaintiff filed a declaration in response that the Court has not yet considered, the Court has not entered judgment terminating this action.

The Court construes Plaintiff's notice of appeal as an application to file an interlocutory appeal of the Court's February 23, 2023, order. For the reasons discussed below, the Court denies Plaintiff's motion for leave to proceed IFP on appeal, her application to appeal IFP, and her application for the Court to request *pro bono* counsel.

DISCUSSION

A. Interlocutory appeal

Because the Court, in its February 23, 2023, order, directed Plaintiff to show cause why the Court should not impose the abovementioned filing bar on her, that order is not final. *See Smith v. New Haven Superior Court*, 3:20-CV-00744, 2020 WL 4284565, at *3 (D. Conn. July 27, 2020) (“Here, Petitioner filed a notice of appeal from the Court’s order to show cause, which is a non-final order. . . .”); *Mitchell v. City of New York*, No. 17-CV-6258, 2018 WL 10049545, at *1 (S.D.N.Y. Apr. 9, 2018) (“Plaintiff filed a notice of interlocutory appeal in response to an order directing him to show cause, by filing a declaration within sixty days of that order, why the action should not be dismissed as untimely. . . . Plaintiff is attempting to appeal from a nonfinal order.”). Thus, any appeal from that order is interlocutory. *See* 28 U.S.C. § 1292; *Van Cauwenbergh v. Biard*, 486 U.S. 517, 529-30 (1988). The Court of Appeals may authorize an interlocutory appeal from an order not otherwise appealable in such a manner if an application for such an appeal is made within 10 days after entry of that order. *See* § 1292(b). The Court understands Plaintiff’s notice of appeal to be an application to file an interlocutory appeal of the Court’s February 23, 2023, order. *See* *Mei Xing Yu v. Hasaki Rest., Inc.*, 874 F. 3d 94, 97 (2d Cir. 2017) (construing a notice of appeal filed in the district court within the 10-day period to file an application for an interlocutory appeal to be a timely filed application to file an interlocutory appeal).

The Court’s February 23, 2023, order was entered on the same date that it was issued, on February 23, 2023. (ECF 8.) Seven days later, on March 2, 2023, Plaintiff filed her notice of appeal, motion for leave to proceed IFP on appeal, application to appeal IFP, and application for the Court to request *pro bono* counsel. (ECF 10.) Thus, Plaintiff’s notice of appeal, to the extent that it can be construed as an application to file an interlocutory appeal, is timely.

B. IFP on appeal

Under 28 U.S.C. § 1915(a)(3), an "appeal may not be taken [IFP] if the trial court certifies in writing that it is not taken in good faith." In its February 23, 2023, order, the Court certified under Section 1915(a)(3) "that any appeal from [that] order would not be taken in good faith" (ECF 8, at 6), denying IFP for the purpose of an appeal, *see* 28 U.S.C. § 1915(a)(3). Thus, because the Court has already decided that any appeal from the Court's February 23, 2023, order would not be taken in good faith, the Court denies Plaintiff's motion for leave to proceed IFP on appeal, and her application to appeal IFP, as moot.

C. Application for the Court to request *pro bono* counsel

In its February 23, 2023, order, the Court dismissed this action. (ECF 8.) Accordingly, the Court denies Plaintiff's application for the Court to request *pro bono* counsel as moot.

CONCLUSION

The Court regards Plaintiff's notice of appeal (ECF 10) as a timely filed application to file an interlocutory appeal. The Court denies Plaintiff's motion for leave to proceed IFP on appeal, application to appeal IFP, and application for the Court to request *pro bono* counsel as moot. (*Id.*)

SO ORDERED.

Dated: April 5, 2023
New York, New York

/s/ Laura Taylor Swain

LAURA TAYLOR SWAIN
Chief United States District Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

COURTNEY GREEN,

Plaintiff,

-against-

PARAMOUNT,

Defendant.

1:23-CV-0535 (LTS)

ORDER OF DISMISSAL
AND TO SHOW CAUSE
UNDER 28 U.S.C. § 1651

LAURA TAYLOR SWAIN, Chief United States District Judge:

Plaintiff Courtney Green, a citizen of Missouri, who is appearing *pro se*, filed this action invoking the court's diversity jurisdiction. She sues Paramount, which she alleges is a citizen of New York. Plaintiff seeks \$175,000,000 in damages, as well as other relief. She describes her claims as "[d]efamation of [c]haracter, slander, malice, invasion of privacy through the disclosure of private facts and intrusion of solitude, theft of intellectual property and unfair business practices, electronic communications privacy act, stored communications privacy act, consumer privacy protection act, cyber security information sharing act, exploitation, racketeering etc." (ECF 2, at 2.) Plaintiff requests the issuance of subpoenas.

forma pauperis ("IFP"), that is, without prepayment of fees. For the reasons set forth below, the Court dismisses this action as frivolous, and directs Plaintiff to show cause by declaration why the Court should not bar Plaintiff from filing any new civil action in this court without prior permission of the court.

STANDARD OF REVIEW

The Court must dismiss an IFP complaint, or any portion of the complaint, that is frivolous or malicious, fails to state a claim on which relief may be granted, or seeks monetary

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relief from a defendant who is immune from such relief. 28 U.S.C. § 1915(e)(2)(B); *see Livingston v. Adirondack Beverage Co.*, 141 F.3d 434, 437 (2d Cir. 1998). The Court must also dismiss a complaint when the Court lacks subject matter jurisdiction of the claims raised. *See*

Prisons, 470 F.3d 471, 474 (2d Cir. 2006) (internal quotation marks and citations omitted, emphasis in original).

BACKGROUND

Plaintiff alleges that, between May 8, 2020, and the present, Paramount has been carrying out “non consensual monitoring and studying of [her] daily habits for ulterior motive[s].” (ECF 5.) She also alleges that Paramount employees have been “able to secretly obtain television information such as mode Upc and other codes to track and collect viewing data and manipulate and control viewing capabilities as well as limit viewing options on numerous occasions through the misuse of company resources.” (*Id.*) Plaintiff further alleges that “[t]he Walt Disney Company [was] able to conceal the act of exploitation, defamation and facilitate the exchange of information to the masses for the purpose of malice and slander towards [her] therefore aiding in the act of racketing.” (*Id.* at 6.) She states that Paramount “exploited/extorted an electronic breach in a television platform/portal to openly monitor, listen, surveil and attempt to converse with [her] through the use of the television device.” (*Id.* at 9.)

As examples of the Paramount’s alleged actions, Plaintiff asserts, among other examples, the following:

(ECF 2, at 13.)

Plaintiff seeks \$175,000,000 in damages, and asks the Court to “put[] in place hefty fines and . . . strict rules and laws against this specific misconduct and misuse of media platform[s] and electronic breach[es].” (*Id.* at 6.) She also asks the Court to order the Walt Disney Company “to incorporate into company policy and use agreements rules and regulations against this behavior [and] order . . . Paramount to disable or restrict the capabilities that make secret surveillance possible. . . .” (*Id.*) Plaintiff also seeks “a written and sign[ed] apology from [Paramount] and all of its parties involved.” (*Id.*)

DISCUSSION

The IFP statute, 28 U.S.C. § 1915, “accords judges not only the authority to dismiss a claim based on an indisputably meritless legal theory, but also the unusual power to pierce the veil of the complaint’s factual allegations and dismiss those claims whose factual contentions are clearly baseless.” *Denton v. Hernandez*, 504 U.S. 25, 32 (1992) (internal quotation marks and citation omitted). A finding of factual frivolousness is warranted when the facts alleged are

“clearly baseless,” “fanciful,” “fantastic,” “delusional” or wholly incredible, “whether or not there are judicially noticeable facts available to contradict them.” *Id.* at 32-33; *see Livingston*, 141 F.3d at 437. The Court must not dismiss a complaint, however, simply because the set of facts presented by the plaintiff appears to be “unlikely.” *Denton*, 504 U.S. at 33.

Granting the *pro se* complaint the liberal interpretation that it is due, the Court finds that there is no factual predicate or legal theory on which Plaintiff can rely to state a viable civil claim arising from her allegations and assertions. Plaintiff asserts, in a conclusory manner, that Paramount is surveilling and harassing her in her home, as well as collecting personal information about her, all via her television. These allegations do not support any of Plaintiff’s claims because they are largely irrational or wholly incredible, and provide no facts suggesting that the television-surveillance actions of which she complains are even possible. *See id.* at 32-33; *Livingston*, 141 F.3d at 437. The Court must therefore dismiss this action as frivolous. *See* 28 U.S.C. § 1915(e)(2)(B)(i); *see also Salahuddin v. Cuomo*, 861 F.2d 40, 42 (2d Cir. 1988) (court may dismiss complaint *sua sponte* and without providing leave to amend “where the substance of the claim pleaded is frivolous on its face”).

By filing this latest frivolous action, Plaintiff disregards the Court's previous warnings as to her continued filing of such actions in this court. Accordingly, the Court directs Plaintiff to show cause by declaration why the Court should not bar her from filing any further civil action in this court without first obtaining permission from this court to file a complaint. *See Moates v. Barkley*, 147 F.3d 207, 208 (2d Cir. 1998) ("The unequivocal rule in this circuit is that the district court may not impose a filing injunction on a litigant *sua sponte* without providing the litigant with notice and an opportunity to be heard."). Plaintiff shall submit to this Court, within 30 days of the date of this order, a written declaration setting forth good cause as to why the Court should not impose such a filing injunction on her. Should Plaintiff fail to submit a declaration within the time directed, or should Plaintiff's declaration fail to set forth good cause why the Court should not impose such a filing injunction, the Court will bar Plaintiff from filing any further civil action in this court without first obtaining permission from the court to do so.

CONCLUSION

The Court dismisses this action as frivolous. 28 U.S.C. § 1915(e)(2)(B)(i). The Court therefore denies Plaintiff's requests for the issuance of subpoenas. The Court also directs Plaintiff to show cause by declaration, within 30 days of the date of this order, why the Court should not bar Plaintiff from filing any further civil action in this court without first obtaining

therefore denies Plaintiff's requests for the issuance of subpoenas. The Court also directs Plaintiff to show cause by declaration, within 30 days of the date of this order, why the Court should not bar Plaintiff from filing any further civil action in this court without first obtaining permission from the court to do so. A declaration form is attached to this order, which Plaintiff should complete as specified.

The Court certifies under 28 U.S.C. § 1915(a)(3) that any appeal from this order would not be taken in good faith, and therefore *in forma pauperis* status is denied for the purpose of an appeal. *See Coppededge v. United States*, 369 U.S. 438, 444-45 (1962).

Statutes and Rules

American Data privacy act

Electronic communication privacy act

Federal consumer online privacy act

Invasion of privacy

16 CFR Part 313: **Privacy of Consumer Financial Information Rule under the Gramm-Leach-Bliley Act**

Consumer Privacy Protection Act of 2017

Exploitation

Racketeering

Malice

Eavesdropping

Aggravated harassment

Unlawful Surveillance in the Second degree

UNITED STATES DISTRICT COURT
for the

Southern District of New York

Courtney Green

Plaintiff

Paramount

Defendant

)
)
)
)
)

Civil Action No. USCA 23-279

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

Paramount

To:

(Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: CBS Mornings (08/05/2020-02/13/2021)(05/8/2021-07/5/2021)KCTV5 (08/5/2020-7/13/2021)5am8am&10am (08/3/2022-09/15/2022)5pm-7pm(02/13/2023-07/20/2023), CBS-sports NFL Season2020 (09/09/2020-01/17/2021)2021(09/09/2021-01/15/2022)2022(09/08/2023-12/30/2022), Late show w James

Place: 1515 Broadway
New York, New York 10036

Date and Time:

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: _____

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Courtney Green, who issues or requests this subpoena, are:

Notice to the person who issues or requests this subpoena

A notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. USCA 23-279

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

I served the subpoena by delivering a copy to the named person as follows: _____

on *(date)* _____ ; or

I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____
Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

UNITED STATES DISTRICT COURT

for the

Southern District of New York

Courtney Green

Plaintiff

Paramount

Defendant

)
)
)
)
)

Civil Action No. USCA 23-279

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

Paramount

To:

(Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Drew Barry more (09/15/2021-11/17/2021)Stephen Colbert (08/9/2022-08/17/2022), The Neighborhood (11/28/2022) channel5 7pm & 38 the spot 8pm, 2022 midterm election results (11/8/2022)

Place: 1515 Broadway New York, New York 10036	Date and Time:
--	----------------

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
--------	----------------

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: _____

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (*name of party*) Courtney Green, who issues or requests this subpoena, are: _____

Notice to the person who issues or requests this subpoena

A notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. USCA 23-279

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____

on *(date)* _____

I served the subpoena by delivering a copy to the named person as follows: _____

on *(date)* _____

; or

I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of

\$ _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

USCA 23-279 green v. Paramount supporting document financial status



P.O. Box 3915
Jefferson City, MO 65102-3915
www.labor.mo.gov/DES

COURTNEY GREEN
[REDACTED]

KANSAS CITY MO [REDACTED]

Date Mailed: 07-21-2023

Social Security No.: XXX-XX-[REDACTED]

Your claim for week ending 07-08-2023 has been credited as the waiting week.

EXHIBIT A

ME DEC 15, 10:28 AM

Hold on, I would like a sample leaf laying next to a tree with a squirrel scatting around. I want a scatter to pull from a limb down next to this leaf, then the squirrel to run back to this leaf and scatter to make up the detail. Would this be possible? I have attached example of logo I want to use.



4. Squirrel next to leaf
This message relates to

I will do scatter and motion graphics

Do you have the following file
shutterstock359014516.JPEG

Cartoon

Scat

Exhibit B

complaint via online portal

green v. Paramount USCA 23-279

Supporting doc.

complaint submitted

Courtney

Green

green7126@gmail.com

Phone number

Viewer Services

Hello I'm reaching out concerning an issue that I contacted CBS about back in March of 2022 in which I never received an response. This issue was regarding invasion of privacy through the viewing of my person through the television while tuning into local network shows including employees of CBS conversing with and exhibiting bullying and verbally abusive misconduct as well as participating/encouraging the constant stalking of my person through virtual methods as well as literal. There have been two recent events within the last week; one with kctv5 news 08/11/2022 5pm evening news and another with on the late night show with Stephen Colbert 08/12/2022.

Verification expired. Check the checkbox again.

I'm not a robot



reCAPTCHA
Privacy - Terms

› SUBMIT YOUR MESSAGE

Exhibit C
complaint via Email

Courtney Green <green7126@gmail.com>
to tagan.lee-greenne ▾

Tue, Nov 29, 11:17 AM ☆ ← :

Hello,

On 11/28/2022 while viewing "The Neighborhood" on channel 5 7pm central time and on 38 the spot 8pm central time I noticed that there were indirect comments implemented into show criteria towards/about my person. I have reached out to CBS about similar incidents in the past. There were also further mentions of a contract.

green v. paramount USCA 23-279
email sent to The
Neighborhood personnel

Green v. paramount USCA 23-279
Complaint submitted via online

paramount

Hello,

complaint written

One more step is required before we can start working on your request. Please confirm your email by clicking on the button below

Your request ID is 5ZVJK2QDH, please keep this for your records.

Request Id: 5ZVJK2QDH

Date Submitted: 11/29/2022 16:14 UTC

What type of request would you like to exercise? (Please select only one request type.): General privacy request

Email: XXXXXXXXXXXXXXXXXXXXcom

Country of residence: XXXXXXXXXtes

State: XXXXXuri

Full Name (optional): Courtney Green

Select Brand(s) for your request: CBS.com, CBS Local, Channel 5

General Privacy Request: XXXXXXXXXXXXXXXXXXXXXXXXX

XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX

XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX

XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX

XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX

XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX

XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXt.

Confirm email



Re:Re: Greeting from [REDACTED] Jewelry

69 messages

To: Courtney Green <green7126@gmail.com>

Mon, Oct 12, 2020 at 8:08 PM

Hello dear, how are you? We are specialized in necklace, earrings, ring, bracelet and so on.
If you have any design need to be places, please send the design, color, size and quantity, as well as your requirements. That we can provide a quote or suggestion. Thank you.

Welcome to check our alibaba site <https://lefengjewelry.en.alibaba.com/>

Best regards,

Tiffany

[REDACTED]

Email: [REDACTED]

Website: [https://www.\[REDACTED\].com](https://www.[REDACTED].com)

-----Original Message-----

From: green7126@gmail.com

To: [REDACTED]

Subject: Re: Greeting from [REDACTED] Jewelry - [REDACTED]

Date: 2020-10-13 05:03:22

Hello, how have you been? Do you have a new collection available?

On Fri, Oct 16, 2018 at 4:48 AM [REDACTED] jewelry.com> wrote:
Hi, Courtney Green,

Nice day. This is [REDACTED] from [REDACTED] Jewelry company, Luna's workmate. I will follow up your project from now on.

If you want to order from us or any doubt, please feel free to contact me.

Good news, we have our own website now, <https://www.lefengjewelry.com>. You can select and order from it, because most of the items in the website have in stock now.

And if you have any advice in our website, welcome to come up with us.

Hope to hear from you soon.

Best regards,

[REDACTED]

Myself, Colorful MiU

Email: [REDACTED]@jewelry.com

Official website: [https://www.\[REDACTED\].com](https://www.[REDACTED].com)

Courtney Green <green7126@gmail.com>

Tue, Oct 13, 2020 at 10:25 AM

To: [REDACTED]

do you have any new stone items?

On Mon, Oct 12, 2020 at 8:06 PM Tiffany <tiffany@lefengjewelry.com> wrote:

Hello dear, how are you? We are specialized in necklace, earrings, ring, bracelet and so on.
If you have any design need to be places, please send the design, color, size and quantity, as well as your requirements. That we can provide a quote or suggestion. Thank you.

Welcome to check our alibaba site <https://lefengjewelry.en.alibaba.com/>

Best regards,

[REDACTED]

[REDACTED]

Email: [REDACTED]@jewelry.com

Website: [https://www.\[REDACTED\].com](https://www.[REDACTED].com)

-----Original Message-----

From: green7126@gmail.com

To: [REDACTED]

Subject: Re: Greeting from [REDACTED] jewelry - MiU

Date: 2020-10-13 05:03:22

Hello, how have you been? Do you have a new collection available?

On Fri, Oct 16, 2018 at 4:48 AM [REDACTED] jewelry.com> wrote:
Hi, Courtney Green,

Nice day. This is MiU from [REDACTED] Jewelry company, Luna's workmate. I will follow up your project from now on.

If you want to order from us or any doubt, please feel free to contact me.

Good news, we have our own website now, <https://www.lefengjewelry.com>. You can select and order from it, because most of the items in the website have in stock now.

And if you have any advice in our website, welcome to come up with us.

Hope to hear from you soon.

Best regards,

Skype: [\[REDACTED\]](#)
Email: [\[REDACTED\]@jewelry.com](#)
Official website: [https://\[REDACTED\]jewelry.com](#)

Exhibit E

[\[REDACTED\]jewelry.com](#)
To: Courtney Green <green7128@gmail.com>

Tue, Oct 13, 2020 at 8:07 PM

you can check our site and send the design to us, that we can check for you, we do customize mainly, can customize according your design.

Best regards,

[\[REDACTED\]](#)

[\[REDACTED\]](#)

Email: [\[REDACTED\]@jewelry.com](#)

Website: [https://\[REDACTED\]jewelry.com](#)

Original Message

From: green7128@gmail.com
To: [\[REDACTED\]](#)
Subject: Re: Re: Greeting from [\[REDACTED\]jewelry](#)
Date: 2020-10-13 23:25:45

do you have any new stone items?

On Mon, Oct 12, 2020 at 6:08 PM Tiffany [\[REDACTED\]@jewelry.com](#) wrote:

Hello dear, how are you? We are specialized in necklace, earrings, ring, bracelet and so on.

If you have any design need to be places, please send the design, color, size and quantity, as well as your requirements. That we can provide a quote or suggestion. Thank you.

Welcome to check our alibaba site [https://\[REDACTED\].en.alibaba.com/](https://[REDACTED].en.alibaba.com/)

Best regards,

[\[REDACTED\]](#)

 [\[REDACTED\]](#)

[\[REDACTED\]](#)

Website: [http://\[REDACTED\]jewelry.com](#)

Original Message

From: green7128@gmail.com
To: [\[REDACTED\]](#)
Subject: Re: Greeting from [\[REDACTED\]jewelry -Milu](#)
Date: 2020-10-13 05:03:22

Hello, how have you been? Do you have a new collection available?

On Fri, Oct 16, 2020 at 4:48 AM <[\[REDACTED\]@jewelry.com](#)> wrote:

Hi, Courtney Green,

Nice day. This is [\[REDACTED\]](#) from [\[REDACTED\]jewelry](#) company, Luna's workmate. I will follow up your project from now on.

If you want to order from us or any doubt, please feel free to contact me.

Good news, we have our own website now, <https://www.lafengjewelry.com>. You can select and order from it, because most of the items in the website have in stock now.

And if you have any advice in our website, welcome to come up with us.

Hope to hear from you soon.

Best regards,

[\[REDACTED\]](#)

Skype: [\[REDACTED\]](#)

Email: [\[REDACTED\]@jewelry.com](#)

Official website: [https://\[REDACTED\]jewelry.com](#)

Courtney Green <green7128@gmail.com>
To: [\[REDACTED\]@jewelry.com](#)

Wed, Oct 14, 2020 at 11:42 AM

Can you get mozarkite stones?

On Tue, Oct 13, 2020 at 8:07 PM Tiffany [\[REDACTED\]@jewelry.com](#) wrote:

you can check our site and send the design to us, that we can check for you, we do customize mainly, can customize according your design.

Best regards,

PARAMOUNT GLOBAL BUSINESS



To whom,

Thanks to your talent, hard work and creativity, we are unleashing the power of content and evolving Paramount for the future. To build on our momentum, it remains critically important for us to uphold a core set of practices that guide how we do business and that reflect our company values.

The Paramount Global Business Conduct Statement, or BCS, defines these common practices for everyone in our global organization. The BCS describes our shared expectations for appropriate conduct in the workplace and our individual ethical and legal responsibilities as Paramount employees. It emphasizes our commitment to fostering a culture of accountability and inclusivity and offers guidance to help us navigate difficult and sensitive situations at work. Consider the BCS our Paramount Code of Conduct.

Our entire community must adhere to these ethical standards, so please review the BCS and be mindful of our policies in your day-to-day activities. If you have questions or concerns, contact the Paramount Global Compliance team at GlobalCompliance@paramount.com.

Although the BCS is comprehensive, no code of conduct can cover every situation that may arise in our complex business environment. Should you become aware of a potential violation of our policies, we ask you to speak up and report your concerns to your manager, department head, HR Business Partner or any of Paramount's Compliance Officers or lawyers.

If you would prefer to receive support from someone outside your location or team, please contact our reporting assistance helpline OPENLINE by calling 855-633-5027 or by visiting openline.paramount.com. Calls to OPENLINE can be made at any time and you may remain anonymous if you wish. Please note that any concerns you raise will be kept as confidential as possible and that we strongly prohibit any retaliation against those who do the right thing by speaking up.

I appreciate your partnership in this effort as we move forward together.

Best,

Bob

3

Upholding our BCS by asking questions & reporting concerns



SPEAKING UP & NON-RETALIATION POLICY

Why it matters

We all want to work in an ethical, respectful workplace that lets us find our voice, speak up and ask questions.

At any large organization, issues occasionally arise, but bad conduct flourishes when it is left unchallenged and remains unaddressed or undisclosed.

Therefore, we each have a responsibility – to ourselves, the Company and each other – to ask questions, raise concerns and hold others accountable. Paramount has created this to always a safe space for employees to raise concerns in good faith. We take your reports very seriously. This is why Paramount prohibits retaliation against anyone for raising or helping to address an integrity concern in good faith.

Paramount employees are required to report behavior that may violate the policies in the BCS or any instances of or concerns about potential harassment or discrimination, to ensure that they are addressed quickly and appropriately (subject to local law).



What it looks like in our day-to-day work

Speaking up, asking questions and escalating concerns when we observe behavior that may violate the policies in the Paramount's Business Conduct Statement or any other Company policy.

Taking personal accountability for raising concerns (and raising them early) – and not waiting for someone else to do it.

Reporting any concerns about harassment and discrimination, whether experienced or observed by you.

Using alternate reporting channels if you feel uncomfortable raising your concern within your immediate department or location.

Being familiar with OPENLINE, Paramount's anonymous reporting line.

Never retaliating against another employee for submitting or helping to address a report in good faith.

For more information, contact the [Office of Global Compliance](#)

Citations:

- *Coppedge v. United States*, 369 U.S. 438, 444-45 (1962).
- *Neitzke v. Williams*, 490 U.S. 319, 325 (1989); see 28 U.S.C. § 1915(e)(2)(B)
- *In re Martin-Trigona*, 9 F.3d 226, 229 (2d Cir. 1993); *Sassower v. Sansverie*, 885 F.2d 9, 11 (2d Cir. 1989) (per curiam)