

IN THE CIRCUIT COURT, FOURTH JUDICIAL CIRCUIT,  
IN AND FOR THE DUVAL COUNTY, FLORIDA

CASE NO.:  
DIVISION:

GERTRUDE PEREZ-POVEDA,

Plaintiff,

vs.

GOOGLE, LLC, JOHN DOE AGENTS  
AND/OR EMPLOYEES OF GOOGLE,  
LLC,

Defendants.

---

**COMPLAINT**

**GENERAL ALLEGATIONS**

1. This case concerns the refusal by Google LLC (“Google”) to return data, contact information, family photos and other personal information belonging to an elderly Florida lady, after Google abruptly and permanently disabled her long-held account, without any prior notice and without any reasonable explanation.

2. Plaintiff Gertrude Perez-Poveda (“Trudy Perez” or “Mrs. Perez”) had a Google account for over 11 years. She used her account primarily for personal and charitable endeavors. During those 11-plus years, Google never warned her of violations of any Google policies or terms of use.

3. Mrs. Perez was using her account in the same manner on September 23, 2023. At that time, Google disabled her account and misappropriated her data.

4. Mrs. Perez requested and demanded an explanation. Google, through several unknown agents and/or employees acting within the course and scope of their agency and/or employment with Google, refused to give her any explanation, other than a vague reference to its “Acceptable Use Policies.”

5. Google continues to refuse Mrs. Perez any further explanation or any access whatsoever to more than 11 years of her accumulated data, photographs, calendars, contact information and other personal data (“Property”), despite acknowledging the information belongs to her and not to Google.

### **PARTIES, JURISDICTION, AND VENUE**

6. Plaintiff Trudy Perez is an individual who has resided in Florida most of her life and currently resides in Duval County, Florida. She is over 76 years of age.

7. Defendant Google is a multinational technology company incorporated in the state of Delaware, with its principal place of business in Santa Clara County, California. Google offers a multitude of products and services including, but not limited to, email (“Gmail”), web browsing (“Chrome”), video sharing (“YouTube”), productivity (“Workspace”), cloud storage (“Drive”) and photo storage (“Photos”).

8. John Doe defendants are all individuals who are either agents and/or employees of Google and who may be part of a “concerned team” involved in the decision and implementation of a plan permanently to disable Mrs. Perez’ account and to deny her access to her own Property. Plaintiff will seek leave to amend the Complaint once the John Doe defendants are identified.

9. This Court has subject matter jurisdiction over Mrs. Perez’ claims pursuant to section 48.193(1)(a)(1)(2) and (6) of the Florida Statutes.

10. This Court has personal jurisdiction, because at all material times, Google was and is currently operating, conducting, engaging in or carrying on a business or business venture in Florida or has an office or agency in Florida, including Duval County. Google and the John Doe defendants have committed acts and omissions towards, and have caused injury to, Mrs. Perez arising out of acts or omissions in and outside the state of Florida when, at the time of the injury, Defendants were engaged in solicitation or service activities within this state, including Duval County, Florida. This Court also has personal jurisdiction over Google pursuant to Fla. Stat. § 501.2041(7).

11. Venue is thus proper in Duval County, Florida, pursuant to Fla. Stat. §47.051, because the cause of action alleged herein accrued there; and Duval County is the county where the Property is located, as it is the venue in which Mrs. Perez used her Google internet address.

12. This Court has authority to grant the requested injunctive relief pursuant to Fla. R. Civ. P. 1.610.

### **FACTS**

13. In approximately 2012, Mrs. Perez first opened her Google account at the address, trudy@familyforlife.info. She operated her Google account in essentially the same manner for over 11 years, without drawing a complaint or warning from Google.

14. Mrs. Perez used Google Workspace, associated with the account, for her personal business during that time, including storing all her family photos and personal documents. She also managed her personal daily affairs on Google Calendar and kept over 11 years of accumulated contact information in her Google account.

15. Mrs. Perez also used her account in connection with her charitable activities, including her affiliation with Family for Life (“FFL”), an unincorporated group primarily

composed of persons who pray, counsel and sometimes hold Catholic Mass and Eucharistic processions near abortion clinics in Jacksonville, Florida. The people of FFL are trained to follow a peaceful, prayerful, law-abiding program intended to reach the hearts of people outside the abortion clinic and to offer loving assistance. Their assembly activities often are in the presence of Jacksonville police officers.

16. On Saturday, September 23, 2023, Mrs. Perez used her Google account, trudy@familyforlife.info, to send an email to FFL people, announcing an upcoming outdoor Catholic Mass across the street from A Woman's Choice abortion clinic at 4131 University Boulevard South in Jacksonville, Florida. The email also announced the Mass would be followed by eucharistic exposition, recitation of the rosary and eucharistic procession, all of which are Catholic religious devotions. The email noted the unborn would be remembered "[p]rayerfully, peacefully and reverently," and that prayer also would be offered up for all people involved, including the abortion-prone mothers, the abortion providers and the pro-life counselors. The email contained photographs of prior prayer vigils, Masses and Eucharistic processions that had occurred at the site in the past. Exhibit 1 (September 23, 2023, 5:53 p.m.), attached hereto and made a part hereof by reference.

17. Approximately one hour after Mrs. Perez sent the email to like-minded FFL people, Google notified Mrs. Perez her account had been suspended, giving no reason whatsoever. Google's notice stated only, "This User suspended alert is to inform you that Google has suspended an account in your domain. You may follow up with the user or contact Google support to obtain further information." Exhibit 2 (September 23, 2023, 7:37 p.m.), attached hereto and made a part hereof by reference.

18. Having no idea why her account had been suspended, Mrs. Perez spent a great deal of time over the next few days trying to communicate with Google and navigating the maze of Google's online procedures, in an attempt to learn what had happened to her main Google account, which included all of her data and information accumulated over many years.

19. All the emails and communications sent by Mrs. Perez to Google, as discussed in this Complaint, were sent from her residence in Jacksonville, Duval County, Florida,

20. Four and a half days after Mrs. Perez' initial online communications with Google, Mrs. Perez received a responsive email from Google on September 28, 2023, stating, "My name is Rajasekhar, and I am representing the Account Recovery Team for Google Workspace Support... I understand you are unable to access trudy@familyforlife.info account and you would like to gain access to the account to use the services. I'll be happy to help you to gain access to the account." Exhibit 3 (September 28, 2023, 6:10 a.m.), attached hereto and made a part hereof by reference.

21. Later that same day, Mrs. Perez received a telephone call from Rajasekhar indicating he would help her regain access to her account. They thereafter exchanged emails, several of which included the requirement that Mrs. Perez identify herself as the owner of the account (although she already had received notice from Google that it considered her the owner of the account).

22. On the evening of September 29, 2023, Rajasekhar emailed Mrs. Perez, "I have raised a request to investigate and restore access..." Exhibit 4, (September 28, 2023, 9:33 a.m.), attached hereto and made a part hereof by reference.

23. On October 3, 2023, 10 days after Mrs. Perez' initial online communications with Google about her account suspension, Rajasekhar sent Mrs. Perez an email indicating a complete reversal of his prior willingness to restore her account, stating:

we have received an update from the *concerned team* about access restoration on Trudy@familyforlife.info account. We have investigated this issue and can confirm that your Trudy@familyforlife.info account has been *permanently disabled* for breaching our Acceptable Use Policy which is a part of the Google Workspace Terms of Service.

Exhibit 5, (October 3, 2023, 3:37 a.m.; emphasis added), attached hereto and made a part hereof by reference.

24. Three hours later on October 3, 2023, Mrs. Perez emailed Google, “I understand that you will not reinstate my account, however I request that you export and send me my data including any and all contacts, emails, photos, notes and documents.” Exhibit 6, (October 3, 2023, 6:45 a.m.), attached hereto and made a part hereof by reference.

25. In response, Google’s Rajasekhar emailed,

I can understand your concern about the data, emails, contacts in trudy@familyforlife.info account. Since the account was permanently disabled for breaching our Acceptable Use Policy which is a part of the Google Workspace Terms of Service. It is not possible to access or transfer data in that email account. ...

I can confirm that this Trudy@familyforlife.info account can not be restored. There is no further action we can take to allow this Trudy@familyforlife.info account to be reused with Google Workspace services.

Exhibit 7, (October 3, 2023, 10:01 a.m.), attached hereto and made a part hereof by reference.

26. Within hours, Mrs. Perez emailed Google that she had done nothing wrong whatsoever and asked Google what it thought she had done:

I don’t see anything in Google Acceptable Use Policy that I could have violated. Send me copies of any emails or other materials allegedly in ‘violation’ of the Google AUP. Identify specifically which provisions of the AUP each such email allegedly violates. ...

You should still have access to **my data - all emails, contacts, photos, videos, notes and all information and documents saved to drives.**

I demand that you send **all my data** to me and do not delete it until I have it in my possession. If you delete or damage any of **my data**, you will cause me significant financial, personal, and emotional damage.

Exhibit 8, (October 3, 2023, 4:26 p.m.; emphasis in original), attached hereto and made a part hereof by reference.

27. In an email on October 4, Google's Rajasekhar responded, "Regarding the policy, due to security reasons **we are unable to share the exact policy which was violated.**" Exhibit 9, (October 4, 2023, 4:10 a.m.; emphasis added), attached hereto and made a part hereof by reference.

28. In that same email, Google again refused to return Mrs. Perez' Property, stating:

I understand your concern about **your** data in trudy@familyforlife.info account. I would like to inform you that the data will not be deleted from the account. It will remain the same in the account under suspended status. Until the workspace account gets deleted, the data will not be deleted or modified or accessed from any circumstances.

Exhibit 9, (October 4, 2023, 4:10 a.m.; emphasis added), attached hereto and made a part hereof by reference (emphasis added).

29. On October 6, 2023, Mrs. Perez again reiterated to Google her ownership of the Property at issue in this lawsuit: "I have tried numerous times to retrieve my data, both by signing into my account and by completing the Account Disabled Form to appeal for account reactivation. All efforts were to no avail.... Google does not have the right to keep or destroy my work-product and data. I own it." Exhibit 10, (October 6, 2023, 4:11 p.m.), attached hereto and made a part hereof by reference.

30. Google's Rajasekhar emailed on October 14, 2023, in response to Mrs. Perez, that Google would continue to deny her access to her own property, "Since we are from the account recovery support team, our team provides technical support services for Google Workspace. However, **the account was suspended due to policy related issues**, we are unable to proceed further on your account access related query." Exhibit 11, (October 14, 2023, 9:09 p.m.; emphasis added), attached hereto and made a part hereof by reference.

31. On October 16, Google’s Rajasekhar emailed to Mrs. Perez, “As informed earlier, I can understand your concern about *your* data in the trudy@familyforlife.info account. ...The data will remain suspended under trudy@familyforlife.info account, it won’t be deleted. ... However, the account was suspended due to policy related issues, we are unable to proceed further on your account access related query.” Exhibit 12, (October 16, 2023, 6:32 a.m.; emphasis added), attached hereto and made a part hereof by reference.

**COUNT I: CONVERSION**  
**(against all Defendants)**

32. Plaintiff Mrs. Perez re-alleges the General Allegations in paragraphs 1-31 above as though fully set forth herein.

33. This is an action for injunctive relief and monetary damages which exceed the sum of \$50,000, exclusive of interest, costs and attorneys’ fees.

34. At all times material to this Complaint, Plaintiff was, and continues to be, the owner of the following personal Property: more than 11 years of accumulated data, photos, contact information, calendars and similar information, associated with her Google account at Trudy@familyforlife.info, including but not limited to, all such Property in her Google Workspace, Gmail, Drive and Photos applications related to her account.

35. Beginning on or about September 23, 2023, and continuing through the present, Defendants exercised wrongful dominion over the Property, to the detriment of the rights of Plaintiff, without the authorization or consent of Plaintiff.

36. The John Doe Defendants’ actions were instrumental in enabling Google to retain Plaintiff’s Property and then refuse to return it to her, despite repeated demand by her and her attorneys and despite knowing the Property belonged to Plaintiff.



37. Defendants do not have any ownership interest or legal right to retain control over Plaintiff's Property or deprive her access to it.

38. Plaintiff sent communications to Defendants demanding the return of her Property, to which she continues to be entitled to immediate possession.

39. Defendants have refused, and continue to refuse, to grant Plaintiff access to her Property and have refused to allow her to take possession and control of it, expressly stating Defendants' refusal is permanent.

40. As a direct and proximate result of Defendants' actions, Plaintiff has suffered irreparable harm and will reasonably suffer irreparable harm in the future due to the deprivation of her Property.

41. Plaintiff has no adequate remedy at law for the harm being done and threatened to be done by the Defendants.

42. The public interest will be served by issuing an injunction, because it will correct the injustice caused by the Defendants' continuing to exercise of wrongful dominion over Plaintiff's Property, to the detriment of the rights of Plaintiff.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully prays that this Court grant the following relief:

- a. Enter a preliminary injunction, enjoining the Defendants from withholding Plaintiff's Property and from denying her immediate possession of such Property, including but not limited to more than 11 years of accumulated data, photos, contact information, calendars and similar information, associated with her

Google account at trudy@familyforlife.info, and all such Property in her Google Workspace, Gmail, Drive and Photos applications related to her Google account;

- b. Enter a permanent injunction enjoining the Defendant from the conduct described immediately above and mandating that Defendant immediately return Plaintiff her Property;
- c. Award actual damages; and
- d. Grant Plaintiff such other and further relief as this Court may deem just and proper.

**COUNT II: CENSORSHIP, DEPLATFORMING, DEPRIVATION OF PROPERTY  
in Violation of Fla. Stat. § 501.2041  
(against Defendant Google)**

- 43. Plaintiff Mrs. Perez re-alleges the General Allegations in paragraphs 1-31 above as though fully set forth herein.
- 44. This is an action for violation of Florida Statute § 501. 2041 seeking injunctive relief and damages which exceed the sum of \$50,000 exclusive of interest, costs and attorneys' fees.
- 45. Defendant Google is a "social media platform," as that term is defined in Fla. Stat. § 501.2041(1)(g).
- 46. On or about September 23, 2023, and following, Defendant Google censored the Plaintiff as to her Google account at Trudy@familyforlife.info. Defendant, among other illegal acts, restricted, inhibited publication and suspended a right to post content or material by a user, the Plaintiff, as defined in Fla. Stat. § 501.2041(1)(b).
- 47. On or about September 23, 2023, and following, Defendant Google deplatformed the Plaintiff as to her Google account at Trudy@familyforlife.info, as Defendant deleted or

banned a user, the Plaintiff, for more than 14 days, as defined in Fla. Stat. § 501.2041(1)(c).

48. Defendant Google censored and/or deplatformed the Plaintiff without notifying the Plaintiff within seven days, including a thorough rationale explaining the reason for such censorship and a precise and thorough explanation of how the Defendant became aware of the censored content, in violation of Fla. Stat. § 501.2041 (2)(d)1. and (3).

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully prays that this Court grant the following relief:

- a. Enter a preliminary injunction, enjoining the Defendants from withholding Plaintiff's Property and from denying her immediate possession of such Property, including but not limited to more than 11 years of accumulated data, photos, contact information, calendars and similar information, associated with her Google account at trudy@familyforlife.info, and all such Property in her Google Workspace, Gmail, Drive and Photos applications related to her Google account, as provided by Fla. Stat. § 501.2041(6)(d);
- b. Enter a permanent injunction enjoining the Defendant from the conduct described immediately above, as provided by Fla. Stat. § 501.2041(6)(d) and mandating that Defendant immediately return Plaintiff her Property;
- c. Award statutory damages for each separate violation, act, or practice of censorship or deplatforming, as provided by Fla. Stat. § 501.2041(6)(a) and (7);
- d. Award actual damages, as provided by Fla. Stat. § 501.2041(6)(b);
- e. Award attorneys' fees and costs; and

- f. Grant Plaintiff such other and further relief as this Court may deem just and proper.

**LIPPES MATHIAS LLP**



---

**MUSA K. FARMAND**

Florida Bar No.: 510343

[mfarmand@lippes.com](mailto:mfarmand@lippes.com) – Primary

[ddoub@lippes.com](mailto:ddoub@lippes.com) - Secondary

**H. LEON HOLBROOK, III**

Florida Bar No.: 319910

[hholbrook@lippes.com](mailto:hholbrook@lippes.com) – Primary

[abarrett@lippes.com](mailto:abarrett@lippes.com) - Secondary

10151 Deerwood Park Blvd.

Building 300, Suite 300

Jacksonville, FL 32256

(904) 660-0020 (Telephone)

(904) 660-0029 (Facsimile)

Attorneys for Plaintiff

# **EXHIBIT 1**

---

**From:** Trudy <trudy1@trudyffl.com>  
**Sent:** Saturday, September 23, 2023 5:33 PM  
**Subject:** The REAL PRESENCE of Jesus Christ will be at the threshold of an abortion clinic October 7 2023!

## **Make Florida TOTALLY Abortion Free!**

*No one is less deserving of being put to death than an Unborn Baby*



*For whosoever shall do the will of  
my Father, that is in heaven, he is my  
brother, and sister, and mother. Mt 12:50*

Dear Family for LIFE,

Bishop Pohlmeier has given permission to Father Joseph Kuhlman to celebrate Mass on the grassy area of Family for LIFE's 313 office (4131 University Blvd., So. Bldg #3) at 8:00 a.m. followed by a Eucharistic Exposition, Recitation of the Rosary and Eucharistic Procession.

The **Real Presence of Jesus Christ** will be at the threshold of the abortion clinic, A Woman's Choice of Jacksonville.



**HOLY MASS**  
**8:00 a.m.**  
**SATURDAY, OCTOBER 7, 2022**  
**Memorial of Our Lady of the Rosary**

**EUCCHARISTIC**  
**EXPOSITION and PROCESSION**  
**Following Mass until 11:00 a.m.**

**4131 University Blvd. S.**  
**Building #3 parking lot**  
**Across the easement from**  
**A Woman's Choice of Jacksonville**



Prayerfully, peacefully and reverently we will remember the tens of thousands of Unborn children who lost their LIVES at this abortuary.

As mothers enter for their appointments for abortions, we will lift our hearts and prayers up

- for the innocent **Unborn** who have died at this facility,
- for their **mothers** who are still living with the pain of abortion that they may be given the grace to ask for forgiveness from God and that they will be able to forgive themselves,





- If you carpool, you may drop off riders outside of our parking lot where the yellow number "2" is on the map below.
- Park your car on surrounding Streets: Bennett, Shull and Stetler (less than a 5-minute walk to site).
- There will be people directing you where to park and offering you a ride to the site.

On Saturday, October 7, we will praise and give glory to God, thanking him for all the LIVES Saved at this location.

God bless you!

Trudy, your sister for LIFE

Family For LIFE

*We do our best ... leave to God the rest ... and wait in peace.*

Please forward this **invitation to save babies** to ALL your family and friends who value LIFE.

If you would like to remain on or be added to Family for LIFE's email distribution list, please reply to this e-mail and type "REMAIN" or "ADD" in the Subject box. If you prefer **not** to be a part of this movement to defend the Unborn, simply reply to this e-mail and type "UNSUBSCRIBE" in the Subject box.

# **EXHIBIT 2**

**From:** [Google Workspace Alerts](#)  
**To:** [Trudy1@familyforlife.info](mailto:Trudy1@familyforlife.info)  
**Subject:** Alert: User suspended  
**Date:** Saturday, September 23, 2023 7:37:09 PM

---

# Google Workspace

This User suspended alert is to inform you that Google has suspended an account in your domain . You may follow up with the user or contact Google support to obtain further information.

The alert details include:

- User: [Trudy@familyforlife.info](mailto:Trudy@familyforlife.info)

Please view the alert center for additional details, investigation options, and remediation recommendations.

[Go to Alert Center](#)

You have received this important update about your Google Workspace account because you are the designated admin recipient for this alert type. You can turn off these alerts or change the email recipients in the [System defined rules](#) section of the Admin Console.

Google LLC 1600 Amphitheatre Parkway Mountain View, CA 94043



# **EXHIBIT 3**

**From:** Google Workspace Support  
**To:** [trudy1@trudyffl.com](mailto:trudy1@trudyffl.com)  
**Subject:** Google Workspace Support 47121544: [verify] trudy@familyforlife.info  
**Date:** Thursday, September 28, 2023 6:10:11 AM

---

# Google Workspace

Hello Trudy,

Thank you for contacting Google Workspace Support. My name is Rajasekhar and I am representing the Account Recovery Team for Google Workspace Support.

I could have contacted you on +1 904-234-5544. However, it will be out of your business hours, so I am sending you this email instead. I have arranged a call back between 9:00 Am to 10:00 Am EDT on 09/28/2023, please be available for call back.

I understand you are unable to access [trudy@familyforlife.info](mailto:trudy@familyforlife.info) account and you would like to gain access to the account to use the services. I'll be happy to help you to gain access to the account.

I appreciate you answering the knowledge questions. We regret to inform you that the information you have provided did not suffice to confirm ownership of the account. A necessary amount of answers need to be correct in order for us to grant access into accounts. We do this in order to protect the information that is on an account and make sure that access is only granted when we can verify that the person who is contacting us is indeed the owner of the account.

You may go through the questions again and email me back your answers. I will be happy to help you to gain access to the account once the account has been fully verified.

Please try to answer all of the questions, specifying a single answer to each one. If you are uncertain about some of the answers, it's a good idea to check the inbox of the personal email address you've specified while registering the Google Workspace account, or the bank that manages the payment method you're using.

Regards,

Rajasekhar

Google Workspace Support

*Follow [@AskWorkspace](#) for regular helpful tips & product updates*

Google

© 2023 Google LLC 1600 Amphitheatre Parkway, Mountain View, CA 94043



# **EXHIBIT 4**



**From:** [Google Workspace Support](#)  
**To:** [trudy1@trudyffl.com](mailto:trudy1@trudyffl.com)  
**Subject:** Google Workspace Support 47121544: [verify] trudy@familyforlife.info  
**Date:** Friday, September 29, 2023 9:33:30 AM

---

## Google Workspace

Hello Trudy,

Thank you for your response.

I appreciate you answering the knowledge questions. I would like to inform you that I have raised a request to investigate and restore access on your [Trudy@familyforlife.info](mailto:Trudy@familyforlife.info) account.

This might take 72 business hours for such a request to be processed. However, I will monitor the case and I will provide you with an update as soon as I have one.

Regards,

Rajasekhar

Google Workspace Support

*Follow [@AskWorkspace](#) for regular helpful tips & product updates*

Google

© 2023 Google LLC 1600 Amphitheatre Parkway, Mountain View, CA 94043



# **EXHIBIT 5**

**From:** Google Workspace Support  
**To:** [trudy1@trudyffl.com](mailto:trudy1@trudyffl.com)  
**Subject:** Google Workspace Support 47121544: [verify] trudy@familyforlife.info  
**Date:** Tuesday, October 3, 2023 3:37:17 AM

---

## Google Workspace

Hello Trudy,

I hope this email finds you well.

I would like to inform you that we have received an update from the concerned team about access restoration on [Trudy@familyforlife.info](mailto:Trudy@familyforlife.info) account. We have investigated this issue and can confirm that your [Trudy@familyforlife.info](mailto:Trudy@familyforlife.info) account has been permanently disabled for breaching our Acceptable Use Policy which is a part of the Google Workspace Terms of Service. For more details regarding our Acceptable Use Policy please visit [https://www.google.com/apps/intl/en/terms/use\\_policy.html](https://www.google.com/apps/intl/en/terms/use_policy.html).

I can confirm that this [Trudy@familyforlife.info](mailto:Trudy@familyforlife.info) account can not be restored. There is no further action we can take to allow this [Trudy@familyforlife.info](mailto:Trudy@familyforlife.info) account to be reused with Google Workspace services.

Regards,

Rajasekhar

Google Workspace Support

*Follow [@AskWorkspace](#) for regular helpful tips & product updates*

Google

© 2023 Google LLC 1600 Amphitheatre Parkway, Mountain View, CA 94043

# **EXHIBIT 6**

---

**From:** Trudy <trudy1@trudyffl.com>  
**Sent:** Tuesday, October 3, 2023 6:45 AM  
**To:** Google Workspace Support  
**Subject:** Re: Google Workspace Support 47121544: [verify] trudy@familyforlife.info

I understand that you will not reinstate my account, however I request that you export and send me my data including any and all contacts, emails, photost, notes and documents.

On Tue, Oct 3, 2023 at 4:37 AM Google Workspace Support <[workspacesupport@google.com](mailto:workspacesupport@google.com)> wrote:

## Google Workspace

Hello Trudy,

I hope this email finds you well.

I would like to inform you that we have received an update from the concerned team about access restoration on [Trudy@familyforlife.info](mailto:Trudy@familyforlife.info) account. We have investigated this issue and can confirm that your [Trudy@familyforlife.info](mailto:Trudy@familyforlife.info) account has been permanently disabled for breaching our Acceptable Use Policy which is a part of the Google Workspace Terms of Service. For more details regarding our Acceptable Use Policy please visit [https://www.google.com/apps/intl/en/terms/use\\_policy.html](https://www.google.com/apps/intl/en/terms/use_policy.html).

I can confirm that this [Trudy@familyforlife.info](mailto:Trudy@familyforlife.info) account can not be restored. There is no further action we can take to allow this [Trudy@familyforlife.info](mailto:Trudy@familyforlife.info) account to be reused with Google Workspace services.

Regards,

Rajasekhar

Google Workspace Support

Follow [@AskWorkspace](#) for regular helpful tips & product updates

Google

© 2023 Google LLC 1600 Amphitheatre Parkway, Mountain View, CA 94043

# **EXHIBIT 7**

**From:** [Google Workspace Support](#)  
**To:** [trudy1@trudyffl.com](mailto:trudy1@trudyffl.com)  
**Subject:** Google Workspace Support 47121544: [verify] trudy@familyforlife.info  
**Date:** Tuesday, October 3, 2023 10:00:49 AM

---

## Google Workspace

Hello Trudy,

Thank you for your response.

I can understand your concern about the data, emails, contacts in [trudy@familyforlife.info](mailto:trudy@familyforlife.info) account. Since the account was permanently disabled for breaching our Acceptable Use Policy which is a part of the Google Workspace Terms of Service. It is not possible to access or transfer data in that email account.

I can confirm that this [Trudy@familyforlife.info](mailto:Trudy@familyforlife.info) account can not be restored. There is no further action we can take to allow this [Trudy@familyforlife.info](mailto:Trudy@familyforlife.info) account to be reused with Google Workspace services.

Regards,

Rajasekhar

Google Workspace Support

*Follow [@AskWorkspace](#) for regular helpful tips & product updates*

Google

© 2023 Google LLC 1600 Amphitheatre Parkway, Mountain View, CA 94043



# **EXHIBIT 8**

---

**From:** Trudy <trudy1@trudyffl.com>  
**Sent:** Tuesday, October 3, 2023 4:26 PM  
**To:** Google Workspace Support  
**Subject:** Re: Google Workspace Support 47121544: [verify] trudy@familyforlife.info

Rajasekhar,

I don't see anything in **Google Acceptable Use Policy** that I could have violated.

Send me copies of any emails or other materials allegedly in "violation" of the Google AUP. Identify specifically which provisions of the AUP each such email allegedly violates.

According to

[https://apps.google.com/supportwidget/articlehome?hl=en&article\\_url=https%3A%2F%2Fsupport.google.com%2Fa%2Fanswer%2F1397578%3Fhl%3Den&assistant\\_event=welcome&assistant\\_id=usermasterbot&product\\_context=1397578&product\\_name=UnuFlow&rigger\\_context=a](https://apps.google.com/supportwidget/articlehome?hl=en&article_url=https%3A%2F%2Fsupport.google.com%2Fa%2Fanswer%2F1397578%3Fhl%3Den&assistant_event=welcome&assistant_id=usermasterbot&product_context=1397578&product_name=UnuFlow&rigger_context=a)

it appears that Google maintains data for up to 20 days. [trudy@familyforlife.info](mailto:trudy@familyforlife.info) was suspended **Sep 23 at 8:37 p.m.** You should still have access to **my data - all emails, contacts, photos, videos, notes and all information and documents saved to drives.**

I demand that you send **all my data** to me and do not delete it until I have it in my possession. If you delete or damage any of **my data**, you will cause me significant financial, personal, and emotional damage.

Trudy

On Tue, Oct 3, 2023 at 11:00 AM Google Workspace Support <[workspacesupport@google.com](mailto:workspacesupport@google.com)> wrote:

**Google Workspace**

Hello Trudy,

Thank you for your response.

I can understand your concern about the data, emails, contacts in [trudy@familyforlife.info](mailto:trudy@familyforlife.info) account. Since the account was permanently disabled for breaching our Acceptable Use Policy which is a part of the Google Workspace Terms of Service. It is not possible to access or transfer data in that email account.

I can confirm that this [Trudy@familyforlife.info](mailto:Trudy@familyforlife.info) account can not be restored. There is no further action we can take to allow this [Trudy@familyforlife.info](mailto:Trudy@familyforlife.info) account to be reused with Google Workspace services.

Regards,

Rajasekhar

Google Workspace Support

Follow [@AskWorkspace](https://twitter.com/AskWorkspace) for regular helpful tips & product updates



© 2023 Google LLC 1600 Amphitheatre Parkway, Mountain View, CA 94043

# **EXHIBIT 9**

**From:** [Google Workspace Support](#)  
**To:** [trudy1@trudyffl.com](mailto:trudy1@trudyffl.com)  
**Subject:** Google Workspace Support 47121544: [verify] [trudy@familyforlife.info](mailto:trudy@familyforlife.info)  
**Date:** Wednesday, October 4, 2023 4:10:18 AM

---

## Google Workspace

Hello Trudy,

Thank you for your response.

I understand your concern about your data in [trudy@familyforlife.info](mailto:trudy@familyforlife.info) account. I would like to inform you that the data will not be deleted from the account. It will remain the same in the account under suspended status. Until the workspace account gets deleted, the data will not be deleted or modified or accessed from any circumstances.

Please note, we don't have the option or access to check or take any actions on your accounts and data. Hence, your data is secured and no one can access it.

Regarding the policy, due to security reasons we are unable to share the exact policy which was violated. Just for your information, for example if you sent hundreds of emails from your email address from your account in a single day or in a short span of time, it might be detected as some suspicious activity. Also, if any of the recipients of your emails has reported anything about your emails like spamming or fraud then the system will restrict your account access based on those reports.

The above explanation was one kind of example about how the policy works. Since the account was suspended due to violation of the Google policies, the account remained suspended.

There is no further action we can take to allow this [Trudy@familyforlife.info](mailto:Trudy@familyforlife.info) account to be reused with Google Workspace services.

Regards,

Rajasekhar

Google Workspace Support

*Follow @AskWorkspace for regular helpful tips & product updates*

Google

© 2023 Google LLC 1600 Amphitheatre Parkway, Mountain View, CA 94043



# **EXHIBIT 10**

**From:** [Trudy](#)  
**To:** [Google Workspace Support](#)  
**Subject:** Re: Google Workspace Support 47121544: [verify] trudy@familyforlife.info

---

Rajasekhar,

Google Support states

“If your account was disabled due to policy violation, you can use the Google Account Disabled Form to appeal for account reactivation.”

I have tried numerous times to retrieve my data, both by signing into my account and by completing the Account Disabled Form to appeal for account reactivation. All efforts were to no avail.

The online GOOGLE TERMS OF SERVICE state:

“Your content remains yours, which means that you retain any intellectual property rights that you have in your content.”

Google does not have the right to keep or destroy my work-product and data. I own it.

**MY** data has time-sensitive information which I need **immediately**. Send it to [trudy1@familyforlife.info](mailto:trudy1@familyforlife.info) by Tuesday, October 9, 2023 11:59 p.m. EST.

Trudy

On Wed, Oct 4, 2023, at 5:10 AM, Google Workspace Support wrote:

**Google Workspace**

Hello Trudy,

Thank you for your response.

I understand your concern about your data in [trudy@familyforlife.info](mailto:trudy@familyforlife.info) account. I would like to inform you that the data will not be deleted from the account. It will remain the same in the account under suspended status. Until the workspace account gets deleted, the data will not



be deleted or modified or accessed from any circumstances.

Please note, we don't have the option or access to check or take any actions on your accounts and data. Hence, your data is secured and no one can access it.

Regarding the policy, due to security reasons we are unable to share the exact policy which was violated. Just for your information, for example if you sent hundreds of emails from your email address from your account in a single day or in a short span of time, it might be detected as some suspicious activity. Also, if any of the recipients of your emails has reported anything about your emails like spamming or fraud then the system will restrict your account access based on those reports.

The above explanation was one kind of example about how the policy works. Since the account was suspended due to violation of the Google policies, the account remained suspended.

There is no further action we can take to allow this [Trudy@familyforlife.info](mailto:Trudy@familyforlife.info) account to be reused with Google Workspace services.

Regards,

Rajasekhar

Google Workspace Support

Follow [@AskWorkspace](#) for regular helpful tips & product updates

Google

© 2023 Google LLC 1600 Amphitheatre Parkway, Mountain View, CA 94043



# **EXHIBIT 11**

**From:** Google Workspace Support  
**To:** [trudy1@trudyffl.com](mailto:trudy1@trudyffl.com)  
**Subject:** Google Workspace Support 47121544: [verify] [trudy@familyforlife.info](mailto:trudy@familyforlife.info)  
**Date:** Saturday, October 14, 2023 9:09:08 PM

---

## Google Workspace

Hello Trudy,

This is a follow up email.

As informed earlier, I can understand your concern about your data in the [trudy@familyforlife.info](mailto:trudy@familyforlife.info) account. As informed earlier, since the [trudy@familyforlife.info](mailto:trudy@familyforlife.info) account was suspended due to breaching our Acceptable Use Policy which is a part of the Google Workspace Terms of Service.

Hence, the account access can't be restored for data access. The data will remain suspended under [trudy@familyforlife.info](mailto:trudy@familyforlife.info) account, it won't be deleted.

Since we are from the account recovery support team, our team provides technical support services for Google Workspace. However, the account was suspended due to policy related issues, we are unable to proceed further on your account access related query.

As we are from technical support, I hope you understand our limitations on policy related exceptions and legal related queries.

There is no further action we can take to allow this [Trudy@familyforlife.info](mailto:Trudy@familyforlife.info) account to be reused with Google Workspace services.

Regards,

Rajasekhar

Google Workspace Support

Follow [@AskWorkspace](#) for regular helpful tips & product updates

Google

© 2023 Google LLC 1600 Amphitheatre Parkway, Mountain View, CA 94043



# **EXHIBIT 12**

**From:** Google Workspace Support  
**To:** [trudy1@trudyffl.com](mailto:trudy1@trudyffl.com)  
**Subject:** Google Workspace Support 47121544: [verify] [trudy@familyforlife.info](mailto:trudy@familyforlife.info)  
**Date:** Monday, October 16, 2023 6:31:44 AM

---

## Google Workspace

Hello Trudy,

This is a follow up email.

As informed earlier, I can understand your concern about your data in the [trudy@familyforlife.info](mailto:trudy@familyforlife.info) account. As informed earlier, since the [trudy@familyforlife.info](mailto:trudy@familyforlife.info) account was suspended due to breaching our Acceptable Use Policy which is a part of the Google Workspace Terms of Service.

Hence, the account access can't be restored for data access. The data will remain suspended under [trudy@familyforlife.info](mailto:trudy@familyforlife.info) account, it won't be deleted.

Since we are from the account recovery support team, our team provides technical support services for Google Workspace. However, the account was suspended due to policy related issues, we are unable to proceed further on your account access related query.

As we are from technical support, I hope you understand our limitations on policy related exceptions and legal related queries.

There is no further action we can take to allow this [Trudy@familyforlife.info](mailto:Trudy@familyforlife.info) account to be reused with Google Workspace services.

Regards,

Rajasekhar

Google Workspace Support

*Follow [@AskWorkspace](#) for regular helpful tips & product updates*

Google

© 2023 Google LLC 1600 Amphitheatre Parkway, Mountain View, CA 94043

