

# Exhibit A



NATIONAL COURT ADMINISTRATION  
REPUBLIC OF KOREA

219 SEOCHO-DAERO, SEOCHO-GU, SEOUL, KOREA, 06590  
Tel: 82-2-3480-1734, Fax: 82-2-533-2824

Apr. 11, 2023  
Our Ref: **2023-F-1109**

**CENTRAL AUTHORITY FOR USA**

Office of International Judicial Assistance  
U.S. Department of Justice  
1100 L Street, NW, Room 8102  
Washington, D.C. 20005  
United States of America

To whom it may concern,

The National Court Administration of the Republic of Korea presents its compliments to the U.S. Department of Justice and has the honour to transmit a request seeking assistance for taking of evidence under the *Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters*.

Please send all documentation concerning execution of the abovementioned request directly to the National Court Administration to the following address :

**National Court Administration  
(Attn: Director of International Affairs)**

**219 Seocho-Daero, Seocho-Gu,**

**Seoul 06590**

**REPUBLIC OF KOREA**

Yours sincerely,

\_\_\_\_\_  
KIM Eun Sil  
Director of International Affairs  
National Court Administration

**MAY - 2 2023**

CIV 189-34-23-12

**REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE PURSUANT TO  
THE HAGUE CONVENTION OF 18 MARCH 1970 ON THE TAKING  
OF EVIDENCE ABROAD IN CIVIL OR COMMERCIAL MATTERS**

**민사 또는 상사의 해외증거조사협약에 따른 요청서**

N.B. Under the first paragraph of Article 4, the Letter of Request shall be in the language of the authority requested to execute it or be accompanied by a translation into that language. However, the provisions of the second and third paragraphs may permit use of English, French or another language.

(주의사항 : 제4조 제1문에 의하여 촉탁서는 이를 집행할 수탁 당국의 언어로 작성하거나 그 언어로 된 번역문을 첨부하여야 합니다. 그러나 제2문, 제3문의 규정에 의하여 영어, 불어 그리고 다른 언어도 허용됩니다.)

In order to avoid confusion, please spell out the name of the month in each date.

(혼란을 피하기 위하여, 날짜를 쓸 때는 각 달의 이름을 쓰시기 바랍니다.)

Please fill out an original and one copy of this form.

(원본을 작성 후 사본 1부를 첨부하시기 바랍니다.)

1. Sender

(발송처)

National Court Administration  
(Attn: Director of International Affairs)  
219 Seocho-daero, Seocho-gu,  
SEOUL 06590  
REPUBLIC OF KOREA

2. Central Authority of  
the Requested State

(수탁 국가의 중앙당국)

Office of International Judicial Assistance  
U.S. Department of Justice  
1100 L Street, NW, Room 8102  
Washington, D.C. 20005  
United States of America

3. Person to whom the  
executed request is to  
be returned

(집행된 요청서의 수신처)

National Court Administration  
(Attn: Director of International Affairs)  
219 Seocho-daero, Seocho-gu,  
SEOUL 06590  
the REPUBLIC OF KOREA

4. Specification of the date by which the requesting authority requires receipt of the response to the Letter of Request

(촉탁당국의 요청서에 대한 회신이 언제까지 도착하기를 바라는지 구체적인 날짜를 기재하시기 바랍니다.)

Date

(날짜)

Reason for urgency\*

(긴급을 요하는 이유)

**IN CONFORMITY WITH ARTICLE 3 OF THE CONVENTION,  
THE UNDERSIGNED APPLICANT HAS THE HONOUR  
TO SUBMIT THE FOLLOWING REQUEST:**

(협약 제3조에 따라 아래에 서명한 신청인은 다음의 촉탁서를 제출합니다.)

- |  |  |
|--|--|
| <p>5. a Requesting judicial authority (Article 3,a)<br/>(촉탁 사법 당국)<br/>(제3조 1)</p>   | Seoul Central District Court,<br>157, Seochojungang-ro, Seocho-gu,<br>SEOUL 06590<br>REPUBLIC OF KOREA |
| <p>b To the competent authority of (Article 3,a)<br/>(집행할 관할 당국)(제3조 1)<br/>(모르는 경우에는 기재하지 말 것.)</p>   |  |
| <p>c Names of the case and any identifying number<br/>(사건의 이름과 번호)</p>   | 2022GaDan5254447 Compensation for damage   |
| <p>6. Names and addresses of the parties and their representatives<br/>(including representatives in the requested State*) (Article 3,b)<br/>(당사자 및 변호인들의 이름과 주소(수탁 국가내의 변호인들 포함*)(제3조 2))</p> |  |
| <p>a Plaintiff<br/>(원고)</p>  | BAEK, JONGMIN<br>52, Nonhyeon-ro 159-gil, Gangnam-gu, Seoul,<br>Republic of Korea                      |
| <p>Representatives<br/>(변호인)</p>   | MIN KYUNG YOO, Attorney<br>10F, 725, Eonju-ro, Gangnam-gu, Seoul, Republic<br>of Korea                 |
| <p>b Defendant<br/>(피고)</p>  | The unknown and four others  |
| <p>Representatives<br/>(변호인)</p>   |  |
| <p>c Other parties<br/>(그 외)</p>   |  |
| <p>Representatives<br/>(변호인)</p>   |  |

\* Omit if not applicable.  
(필요 없을 경우에는 삭제할 것.)

<p>7. a Nature of the proceedings(divorce, paternity, breach of contract, product liability, etc.) (Article 3,c) (정차의 성격(이혼, 친자, 계약위반, 생산물 책임, 기타 등등))(제3조 3)</p>	<p>Compensation for damage</p>
<p>b Summary of complaint (소장(청구)에 대한 요약)</p>	<p>Defendants, by means of his or her Instagram account, insulted the plaintiff publicly and the plaintiff came to claim compensation for damages against the defendant since the Plaintiff suffered financial damage and mental distress due to the insult of the defendants.</p>
<p>c Summary of defence and counterclaim* (답변과 반소의 요약)</p>	
<p>d Other necessary information or documents* (그 외 필요한 정보 및 문서*)</p>	
<p>8. a Evidence to be obtained or other judicial act to be performed(Article 3,d) (취득할 증거 또는 이행 할 그 밖의 사법적 처분)(제3조 4)</p>	<p>1601 Willow Road, Menlo Park, California 94025 Meta Platforms, Inc.  Refer to the Attached documents (Application for the Order to Submit the Documents)</p>
<p>b Purpose of the evidence or judicial act sought (증거 또는 사법적 처분을 요청하는 목적)</p>	<p>Since the plaintiff is not aware of the defendants' identity for now and every piece of information to specify the identity of the defendants is being kept only by Meta Platforms, Inc., the order to submit the documents is required to specify the identity of the defendants.</p>
<p>9. Identity and address of any person to be examined (Article 3,e)* (신문 받을 자의 신원과 주소)* (제3조 5)*</p>	<p>Refer to the Attached documents (Application for the Order to Submit the Documents)</p>
<p>10. Questions to be put to the persons to be examined or statement of the subject matter about which they are to be examined (Article 3,f)* (신문받을 자에게 할 질문 또는 신문이 이루어질 소송물(주된내용)에 관한 설명)(제3조 6)*</p>	

\* Omit if not applicable.  
(필요 없을 경우에는 삭제할 것.)

11. Documents or other property to be inspected  
(Article 3,g)\*  
(증거조사가 이루어질 서류나 물건 (부동산, 동산 등))(제3조 7)\*

12. Any requirement that the evidence be given on oath or affirmation and any special form to be used  
(Article 3,h)\*  
(증거가 선서 또는 서약에 의하여 제출되어야 하는 요건 및 사용될 특별한 형식)(제3조 8)\*

13. Special methods or procedure to be followed (e.g. oral or in writing, verbatim, transcript or summary, cross-examination, etc.)  
(Articles 3, i)and 9)\*  
(따라야 하는 특별한 방식 또는 절차)  
(예: 말로 또는 글로, 말한 그대로 글로, 글로 옮긴 기록 또는 요약, 반대신문, 기타 등등)(제3조 9, 제9조)\*

14. Request for notification of the time and place for the execution of the Request and identity and address of any person to be notified  
(Article 7)\*  
(촉탁서의 집행 시간과 장소를 관계 당사자 또는 대리인에게 알려 달라는 요청, 그리고 알려줘야 할 이의 신원과 주소)(제7조)\*

15. Request for attendance or participation of judicial personnel of the requestion authority at the execution of the Letter of Request  
(Article 8)\*  
(촉탁서의 집행시에 촉탁 당국 법관의 출석 또는 참여 요청)(제8조)\*

\* Omit if not applicable.  
(필요없을 경우에는 삭제할 것.)

16. Specification of privilege or duty to refuse to give evidence under the law of the State of origin (Article 11,b)\*  
(축타국의 법에 의하여 증거제출을 거부할 특권이나 의무)  
(제11조 2)\*

[Empty box for specification of privilege]

17. The fees and costs incurred which are reimbursable under the second paragraph of Article 14 or under Article 26 of the Convention will be borne by\*  
(14조항과 26조항에 의한 요금과 비용의 상환 주체)


[Empty box for fees and costs]

DATE OF REQUEST

MAR. 14. 2023

SIGNATURE AND SEAL OF THE REQUESTING AUTHORITY

YOON SUNGHUN

윤성훈 

\* Omit if not applicable.  
(필요없을 경우에는 삭제할 것.)

SEOUL CENTRAL DISTRICT COURT

RULING

Case 2022GaDan5254447 Compensation for damage(Gi)

Plaintiff BAEK, JONGMIN (백종민)

Plaintiff's attorney: Min Kyung Yoo, Attorney for the Law Firm, "THEON, LLC"

Defendant The unknown and four others

Documents holder As presented in the attachment

TEXT

The documents holder shall submit the following documents to this court within 7 days from the receipt date of this ruling.

Document: As presented in the attachment.(Limited to Paragraph 1 of the indications in the attachment)

REASONING

Since the application for the order to submit the documents, in this case, is deemed justifiable, the ruling has been made as the text.

March 13, 2023



Judge SUNGHUN YOON



Seoul Central District Court 2022GaDan5254447 Compensation for damage(Gi) the same as the original submitted on Feb. 15, 2023

## Application for the Order to Submit the Documents

Case 2022GaDan5254447 Compensation for Damage(Gi) [Court in charge: Civil 31 Single]

Plaintiff BAEK, JONGMIN (백종민)

Defendant The unknown and four others

In order to prove the alleged facts for the case above, the plaintiff applies for the order to submit documents as follows.

### Indication of Documents

1. Information (names, dates of birth, e-mail addresses, and cell phone numbers) and the last 3 months' IP addresses about those subscribers whose Instagram accounts are "dr.jaylee\_jumull\_", "\_the\_battle\_against\_insta.gram", "ssam.ja.3333", "o\_mark\_n\_rona\_o", and "lavita\_miruku.hime".
2. Whether there are other accounts created by the subscribers whose accounts are "dr.jaylee\_jumull\_", "\_the\_battle\_against\_insta.gram", "ssam.ja.3333", "o\_mark\_n\_rona\_o", or "lavita\_miruku.hime". If there is any, the name of the accounts and all the information of the account(s).

### Gist of the Documents

Defendants, by means of their Instagram accounts, insulted the plaintiff publicly and the plaintiff came to file this case since the Plaintiff suffered financial damage and mental distress due to the insult of the defendants. Meanwhile, the plaintiff is not aware of each defendant's identity for now, and every piece of information to specify the identity of the defendants is being kept only by Meta Platforms, Inc[Attachment 1. Instagram Help Center - Information for the judicial authorities].

## Holder of Documents

Meta Platforms, Inc

Address: 1601 Willow Road, Menlo Park, California 94025

## FACTS TO BE PROVED

In order to specify the identity of the defendants in this case.

## CAUSES for the DUTY of SUBMITTING DOCUMENTS

### ① Types

- Documents quoted in the litigation by a party (quoted documents)
- The applicant has the legal right to demand a handover or reading of the documents from the person who holds them (handover, reading of documents)
- Documents were made for the benefit of the applicant (beneficial documents)
- Documents were made under the legal relations between the applicant and the person who holds the documents (legal relations documents)
- Other documents that need to be submitted (reason:)

## ATTACHMENTS

1. Instagram Help Center - Information for the judicial authorities
2. Defendant 1's posting
3. Defendant 2's posting
4. Defendant 3's posting

Seoul Central District Court 2022GaDan5254447 Compensation for damage(Gi) the same as the original submitted on Feb. 15, 2023

5. Defendant 4's posting

6. Defendant 5's posting

February 15, 2023

An Attorney for the Plaintiff

Law Firm, "THEON, LLC"

MIN KYUNG YOO, Attorney

To Seoul Central District Court



## Submission of Requests

Online:

Law enforcement officials may use the Law Enforcement Online Request System for the submission, tracking and processing of requests. A government-issued email address is required to access the Law Enforcement Online Request System.

Please note:

For U.S. Law Enforcement:

Law enforcement officials seeking Instagram account records must address their request to:

Meta Platforms, Inc.,  
1601 Willow Road,  
Menlo Park, CA 94025.

For Law Enforcement outside of the U.S.:

Please note that for users of the Instagram services in the European region, the service provider and data controller is Meta Platforms Ireland Ltd. If your request is for Meta Platforms Ireland Ltd., it must be addressed to:

Meta Platforms Ireland Ltd.,  
4 Grand Canal Square  
Dublin 2, Ireland.

For Instagram users in countries outside of the European region, the service provider is Meta Platforms, Inc., please ensure that any requests for Instagram or Facebook user data are correctly addressed to:

Meta Platforms, Inc.  
1601 Willow Road,  
Menlo Park, CA 94025.

Seoul Central District Court 2022GaDan5254447 Compensation for damage(Gi) the same as the original submitted on Feb. 15, 2023



**dr.jaylee\_jumull\_@mrs\_mulb.\_**

Her appearance has already no goddam class whatsoever, so the prices of clothing are also outrageous. What the fuck, a motherless bitch!

87 Weeks 8 Likes Reply Send

Seoul Central District Court 2022GaDan5254447 Compensation for damage(Gi) the same as the original submitted on Feb. 15, 2023



**\_the\_battle\_against\_insta.gram**

What's the use of success? The mind is a dickhead

50 Weeks 1 Like Reply Send



**\_the\_battle\_against\_insta.gram** What the hell, you're shitting



**\_the\_battle\_against\_insta.gram**

[@o\\_mark\\_n\\_rona\\_o](#) Goddam freak show

20 Weeks 1 Like Reply Send

Seoul Central District Court 2022GaDan5254447 Compensation for damage(Gi) the same as the original submitted on Feb. 15, 2023



**ssam.ja.3333** The goddam detergent is fucking delayed every time. Go bankrupt! I enjoy using detergents made by big companies. Not gonna use yours, fucking bitch!

50 Weeks 5 Likes Reply Send



Seoul Central District Court 2022GaDan5254447 Compensation for damage(Gi) the same as the original submitted on Feb. 15, 2023



Seoul Central District Court 2022GaDan5254447 Compensation for damage(Gi) the same as the original submitted on Feb. 15, 2023



**lavita\_miruku.hime** [@ssam.ja.3333](#) Isn't it true that The Chommy is countrified? What's wrong with calling something countrified to be countrified?? 😊 Considering an ugly person wearing this may look that much good, aren't people buying this with the thought they would look better wearing this than the ugly person? It's fucking funny to rip people off by doing this fucking shit.

71 Weeks 8 Likes Reply Send



### LOHAS Certified Public Translator Office

Address: (06611) KI tower 10F 109, Gangnam-daero 69-gil 8, Seocho-gu, Seoul, Republic of Korea, Tel:+82 010-2957-1846, E-mail:lohas-office@naver.com

# CERTIFICATE OF TRANSLATION

In accordance with the Licensed Administrative Agent Act (Law No. 17394 amended on June 10th, 2021) of the Republic of Korea, a certified public translator & licensed administrative agent is duly authorized to prepare, confirm and translate foreign documents submitted to public offices into Korean or Korean documents issued by administrative offices into foreign language and vice versa (Article 2), and may issue an attestation of translation for any document translated by him/her(Article 20).

No. 23-0322-01

Date: March 22, 2023

Title of Document : Court Ruling

Name of Requester : BAEK, JONGMIN

I, the below signed **AHN, MAGHNGYU**, Certified Public Translator & Licensed Administrative Agent by the Ministry of the Interior and Safety, DO HEREBY CERTIFY:

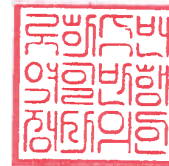
that the attached documents were prepared and translated by me at the request of the above named person who has duly appeared and confirmed the contents of the documents at my office;

that to the best of my knowledge, the documents were prepared and translated accurately for the public purpose of use for international businesses, immigration, or overseas studies, etc, in accordance with the relevant regulations and laws.

IN TESTIMONY Whereof, I have hereunto subscribed my name and affixed my seal of office.



*Handwritten signature: 안민구*



**AHN, MAHNGYU**

Certified Public Translator & Licensed Administrative Agent  
Registration No. 18302025406

## SWORN STATEMENT (AFFIDAVIT)

AUTHORITY: Article 2 and 20 of the Licensed Administrative Agent Act (Law No. 17394)  
of the Republic of Korea

USES: This sworn statement may be submitted to foreign government institution, immigration, immigration office, educational institution, law enforcement agencies, customs, recruitment, and other related institutions, attached to the original document(s) and its translated document(s).

I, **AHN, MAHNGYU**, being duly sworn, hereby depose and say:

that I am authorized as a Certified Public Translator and a Licensed Administrative Agent (license No. 18302025406) by the Ministry of the Interior and Safety of Korea;

that I have translated the attached document(s) from Korean into English;

that this copy is true and correct to the original;

that it is a true and correct translation to the best of my knowledge, ability and belief;

that I have strictly prepared the attached document(s) and issued a certificate of translation in accordance with the relevant Korean laws and regulations including the Licensed Administrative Agent Act and the Personal Information Protection Act.



signed by: AHN, MAHNGYU as of March 22, 2023

LOHAS Certified Public Translator & Licensed Administrative  
Agent Office

Address: (06611) KI tower 10F 109, Gangnam-daero 69-gil 8, Seocho-gu, Seoul,  
Republic of Korea,

Phone: +82 010-2957-1846, E-mail: lohas-office@naver.com

서울중앙지방법원

결 정

사 건 2022가단5254447 손해배상(기)

원 고 백종민

원고 소송대리인 법무법인(유한)더온 담당변호사 유민경

피 고 성명불상자 외 4명

문서소지인 별지와 같음

주 문

문서소지인은 이 결정을 받은 날로부터 7일 이내에 다음 문서를 이 법원에 제출하라.

문서의 표시 : 별지와 같음.(단, 별지 문서의 표시 중 제1항에 한함)

이 유

이 사건 문서제출명령 신청은 이유 있으므로 주문과 같이 결정한다.

2023. 3. 13.

판사

윤성현



## 문서제출명령 신청서

사 건 2022가단5254447 손해배상(기) [담당재판부:민사 31단독]  
원 고 백종민  
피 고 성명불상자 외 4명

위 사건에 관하여 원고는 주장사실을 증명하기 위하여 아래와 같이 문서의 제출명령을 신청합니다.

### 문서의 표시

1. 인스타그램 계정 "dr.jaylee\_jumull\_", "\_the\_battle\_against\_insta.gram", "ssam.ja.3333", "o\_mark\_n\_rona\_o", "lavita\_miruku.hime"의 각 가입자 정보(이름, 생년월일, 이메일, 휴대전화번호 등) 및 최근 3개월 동안의 IP 주소.
2. 위 "dr.jaylee\_jumull\_", "\_the\_battle\_against\_insta.gram", "ssam.ja.3333", "o\_mark\_n\_rona\_o", "lavita\_miruku.hime" 계정의 가입자가 생성한 또다른 계정이 있는지 여부. 있다면 해당 계정명 및 계정 정보 일체.

### 문서의 취지

피고들은 자신들의 인스타그램 계정을 이용하여 원고를 공연히 모욕하였고, 원고는 피고들의 모욕행위로 인해 재산상 손해 및 정신적 고통을 입게 되어 이 사건 청구에 이르게 되었습니다. 다만 현재 원고는 피고들의 신상에 관하여 알지 못하고, 피고들의 인적사항을 특정하기 위한 정보 일체는 오직 인스타그램의 모회사인 메타 플랫폼스(Meta Platforms, Inc.)만이 보관하고 있습니다[첨부서류 1. 인스타그램 고객센터 - 사법당국을

위한 정보].

## 문서를 가진 사람

Meta Platforms, Inc.

주소 : 1601 Willow Road, Menlo Park, California 94025

## 증명할 사실

이 사건 피고들의 인적사항을 특정하기 위함입니다.

## 문서제출의무의 원인

### ① 해당유형

- 당사자가 소송에서 인용한 문서(인용문서)
- 신청자가 문서를 가지고 있는 사람에게 그것을 넘겨달라고 하거나 보겠다고 요구할 수 있는 사법상의 권리를 가지고 있음(인도, 열람문서)
- 문서가 신청자의 이익을 위하여 작성되었음(이익문서)
- 문서가 신청자와 문서를 가지고 있는 사람사이의 법률관계에 관하여 작성된것임(법률관계문서)
- 그밖에 제출이 필요한 문서( 사유 : )

## 첨 부 서 류

1. 인스타그램 고객센터-사법당국을 위한 정보
2. 피고 1. 게시글
3. 피고 2. 게시글
4. 피고 3. 게시글



5. 피고 4. 게시글

6. 피고 5. 게시글

2023.02.15

원고 소송대리인

법무법인(유한)더온

담당변호사 유민경

서울중앙지방법원 귀중



## 요청 제출

온라인:

사법당국 직원은 사법당국용 온라인 요청 시스템을 사용하여 요청을 제출, 추적, 처리할 수 있습니다. 사법당국용 온라인 요청 시스템에 액세스하려면 정부에서 발급한 이메일 주소가 필요합니다.

다음 내용을 참고하세요.

미국 사법당국:

Instagram 계정 기록을 요청하는 사법당국 직원은 다음 주소로 요청을 보내야 합니다.

Meta Platforms, Inc.,  
1601 Willow Road,  
Menlo Park, CA 94025.


미국 외 지역의 사법당국:


유럽 지역의 Instagram 서비스 사용자의 경우 서비스 제공업체 및 데이터 관리자는 Meta Platforms Ireland Ltd.입니다. Meta Platforms Ireland Ltd.에 대한 요청인 경우 다음 주소로 요청을 보내야 합니다.

Meta Platforms Ireland Ltd.,  
4 Grand Canal Square  
Dublin 2, Ireland.

유럽 지역 외 국가의 Instagram 사용자의 경우 서비스 제공업체는 Meta Platforms, Inc.입니다. Instagram 또는 Facebook 사용자 데이터에 대한 요청은 다음 주소로 올바르게 보내야 합니다.

Meta Platforms, Inc.  
1601 Willow Road,  
Menlo Park, CA 94025.

 dr.jaylee\_jumull\_@mrs\_mulb\_ 이미  
와꾸가 근본없어서 옷가격도 애미없나봐ㅋㅋ  
ㅋㅋㅋㅋ 에레이 씨팔 애미뒤진년  
87주 [답변](#) [답변](#) [답변](#) [답변](#) [답변](#)

 **\_the\_battle\_against\_insta.gram** 출세  
하면 뭐해. 마인드가 버스  
504    좋아요 1개    댓글 0개    보내기

 **\_the\_battle\_against\_insta.gram** 지를 똥싸고 있네

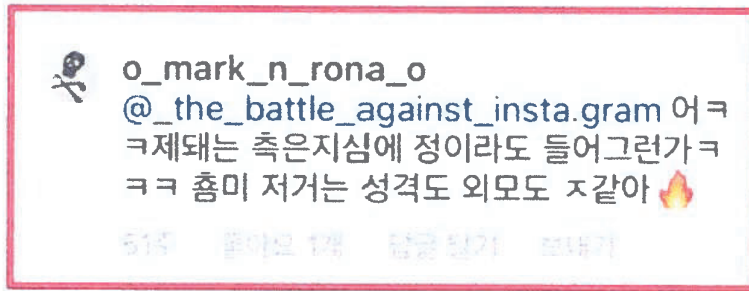
 **\_the\_battle\_against\_insta.gram**  
**@o\_mark\_n\_rona\_o** 지르엄봉하네  
207    좋아요 1개    댓글 0개    보내기

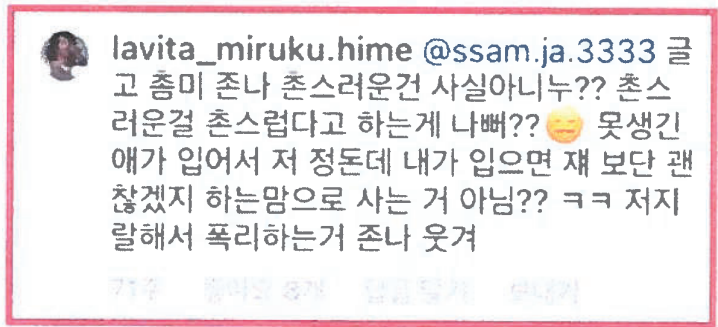


ssam.ja.3333 그놈의 세제는 개별 매번 미뤄지는  
중ㅋㅋㅋ망해라 대기업 세제 잘만쓴다 니꺼안써 쌍  
년아

신고수 0개 댓글 5개 답글 0개 좋아요 0개

서울중앙지법 2022가단5254447 손해배상(기) 2023.02.15 제출 원본과 상위 없음





# Exhibit B



**From:** [Wolinsky, Benjamin \(USACAN\)](#)  
**To:** [emmaroberts@perkinscoie.com](mailto:emmaroberts@perkinscoie.com)  
**Subject:** Meta Platforms, Inc. - Request for Int'l Judicial Assistance  
**Date:** Thursday, July 20, 2023 3:24:00 PM  
**Attachments:** [Attachments \(July 20, 2023\).pdf](#)  
[Ltr. to E. Roberts \(July 20, 2023\).pdf](#)  
**Importance:** High

---

Dear Ms. Roberts:

My name is Ben Wolinsky; I'm an Assistant U.S. Attorney in the Northern District of California.

Attached is a letter concerning a request for international judicial assistance directed to your client, Meta Platforms, Inc.

Please feel free to contact me to discuss.

Best,  
Ben Wolinsky  
Assistant United States Attorney  
Northern District of California  
450 Golden Gate Avenue, 9th Floor  
San Francisco, CA 94102  
T: 415-436-6996  
F: 415-436-6748



*United States Attorney  
Northern District of California*

*9th Floor, Federal Building  
450 Golden Gate Ave., Box 36055  
San Francisco, CA 94102-3495*

*Ph: (415) 436-6996  
Fax: (415) 436-7234*

July 20, 2023

**BY EMAIL**

Emma Roberts, Esq.  
500 North Akard Street, Suite 3300  
Dallas, Texas 75201-3347  
*emmaroberts@perkinscoie.com*

Re: Request for International Judicial Assistance from the National Court  
Administration of the Republic of Korea

Dear Ms. Roberts:

I am an Assistant United States Attorney in the United States Attorney's Office for the Northern District of California.

A court in the Republic of Korea ("Korea") has requested assistance from the United States Department of Justice to obtain information from Meta Platforms, Inc. ("Meta") for use in litigation pending before the Seoul Central District Court No. 157. A request such as this from a foreign court falls under the Hague Convention on the Taking Evidence Abroad in Civil or Commercial Matters, a multi-national treaty. The United States has agreed to act upon letters of request from foreign governments and to ensure compliance with foreign court orders.

As you will see from the enclosed Korean court documents, the Korean court has requested that the United States assist in obtaining any information that Meta has regarding the following request:

1. Names, dates of birth, e-mail addresses, cell phone numbers, and the last three months' IP addresses about those subscribers whose Instagram accounts are "dr.jaylee\_ju\_mull," "\_the\_battle\_against\_insta.gram," "ssam.ja.333," "o\_mark\_n\_rona\_o," and "lavita\_miruku.hime".
2. Whether there are other accounts created by the subscribers whose accounts are "dr.jaylee\_ju\_mull," "\_the\_battle\_against\_insta.gram," "ssam.ja.333,"

“o\_mark\_n\_rona\_o,” and “lavita\_miruku.hime”. If there [are] any, the name of the accounts and all [of] the information of the account(s).

The underlying case in Korea concerns emotional distress claims between Jongmin Baek and yet-unknown defendants.

After you review the specific request for information set forth in the enclosed request (the English translation of the request is on page 9 of the enclosed document), please let me know under what circumstances, if any, Meta can provide my office with the requested information. I hope that you will provide the answers voluntarily by completing the enclosed form, entitled “Execution Affidavit of Letter of Request,” which sets forth the questions as worded in the attached translation of the Letter of Request. After completing the affidavit, please sign the last page before a notary public and return it to me, preferably by Federal Express, at the address below:

AUSA Ben Wolinsky  
Phillip Burton Federal Building  
450 Golden Gate Avenue, Ninth Floor  
San Francisco, CA 94102

If you would like, our office can take the steps necessary to serve Meta with a court-authorized subpoena pursuant to 28 U.S.C. § 1782.

Please let me know, however, if Meta is willing to provide voluntarily the requested information. I would be happy to work with Meta to provide as much time as it reasonably needs to provide voluntarily the requested information.

Finally, if Meta is unwilling to provide the requested information, please send me a letter stating the reasons why Meta cannot provide the requested information, with appropriate legal citations. I will then consider Meta’s position before taking any further action on this matter.

Please contact me by August 3, 2023, to let me know if Meta will comply voluntarily with the Request. You can reach me at (415) 436-6996 or by e-mail at [benjamin.wolinsky@usdoj.gov](mailto:benjamin.wolinsky@usdoj.gov).

If I do not hear from you by August 3, 2023, I will presume that Meta has chosen to be served with a subpoena.

Sincerely,

ISMAIL J. RAMSEY  
United States Attorney

By: /s/ Benjamin J. Wolinsky  
BENJAMIN J. WOLINSKY  
Assistant United States Attorney

U.S. ATTORNEY’S OFFICE  
NORTHERN DISTRICT OF CALIFORNIA

-----  
IN RE:

Ref No. 2023-F-1109

REQUEST FOR JUDICIAL ASSISTANCE FROM  
THE SEOUL CENTRAL DISTRICT COURT  
NO. 157, IN THE MATTER OF *JONGMIN BAEK* v.  
*UNKNOWN DEFENDANTS*.

DJ No. 189-34-23-12

-----  
**EXECUTION AFFIDAVIT OF LETTER OF REQUEST**

I, \_\_\_\_\_, a citizen of \_\_\_\_\_, state as follows:

I have been furnished by the United States Attorney for the Northern District of California in San Francisco, California, with a copy of the above captioned Letter of Request, issued pursuant to the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters, requesting that I answer written interrogatories relating to a civil case captioned *Jongmin Baek v. Unknown Defendant*, Ref No. 2023-F-1109, and pending before the Seoul Central District Court No. 157 in Seoul, Republic of Korea. The following are my responses to the questions contained in the request. These responses are based upon personal knowledge.

INFORMATION REQUESTED FROM META PLATFORMS, INC.

**Information Sought:**

1. Names, dates of birth, e-mail addresses, cell phone numbers, and the last three months’ IP addresses about those subscribers whose Instagram accounts are “dr.jaylee\_ju\_mull,” “\_the\_battle\_against\_insta.gram,” “ssam.ja.333,” “o\_mark\_n\_rona\_o,” and “lavita\_miruku.hime”.
2. Whether there are other accounts created by the subscribers whose accounts are “dr.jaylee\_ju\_mull,” “\_the\_battle\_against\_insta.gram,” “ssam.ja.333,” “o\_mark\_n\_rona\_o,” and “lavita\_miruku.hime”. If there [are] any, the name of the accounts and all [of] the information of the account(s).

**Answer:**

**Answer (cont'd):**

The foregoing answers are true and correct to the best of my knowledge and belief.

Dated: \_\_\_\_\_ in \_\_\_\_\_, \_\_\_\_\_(City, State)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Print Name

On this \_\_\_\_\_day of \_\_\_\_\_, 20\_\_\_\_, before me, the undersigned notary public, personally appeared \_\_\_\_\_(name of document signer), and proved to be the person whose name is signed on the document.

\_\_\_\_\_  
Notary Public Signature and Seal

My commission expires: \_\_\_\_\_



NATIONAL COURT ADMINISTRATION  
REPUBLIC OF KOREA

219 SEOCHO-DAERO, SEOCHO-GU, SEOUL, KOREA, 06590  
Tel: 82-2-3480-1734, Fax: 82-2-533-2824

Apr. 11, 2023  
Our Ref: **2023-F-1109**

**CENTRAL AUTHORITY FOR USA**

Office of International Judicial Assistance  
U.S. Department of Justice  
1100 L Street, NW, Room 8102  
Washington, D.C. 20005  
United States of America

To whom it may concern,

The National Court Administration of the Republic of Korea presents its compliments to the U.S. Department of Justice and has the honour to transmit a request seeking assistance for taking of evidence under the *Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters*.

Please send all documentation concerning execution of the abovementioned request directly to the National Court Administration to the following address :

**National Court Administration  
(Attn: Director of International Affairs)**

**219 Seocho-Daero, Seocho-Gu,**

**Seoul 06590**

**REPUBLIC OF KOREA**

Yours sincerely,

\_\_\_\_\_  
KIM Eun Sil  
Director of International Affairs  
National Court Administration

**MAY - 2 2023**

CIV 189-34-23-12

**REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE PURSUANT TO  
THE HAGUE CONVENTION OF 18 MARCH 1970 ON THE TAKING  
OF EVIDENCE ABROAD IN CIVIL OR COMMERCIAL MATTERS**

**민사 또는 상사의 해외증거조사협약에 따른 요청서**

N.B. Under the first paragraph of Article 4, the Letter of Request shall be in the language of the authority requested to execute it or be accompanied by a translation into that language. However, the provisions of the second and third paragraphs may permit use of English, French or another language.

(주의사항 : 제4조 제1문에 의하여 촉탁서는 이를 집행할 수탁 당국의 언어로 작성하거나 그 언어로 된 번역문을 첨부하여야 합니다. 그러나 제2문, 제3문의 규정에 의하여 영어, 불어 그리고 다른 언어도 허용됩니다.)

In order to avoid confusion, please spell out the name of the month in each date.

(혼란을 피하기 위하여, 날짜를 쓸 때는 각 달의 이름을 쓰시기 바랍니다.)

Please fill out an original and one copy of this form.

(원본을 작성 후 사본 1부를 첨부하시기 바랍니다.)

1. Sender  
(발송처)

National Court Administration  
(Attn: Director of International Affairs)  
219 Seocho-daero, Seocho-gu,  
SEOUL 06590  
REPUBLIC OF KOREA

2. Central Authority of  
the Requested State  
(수탁 국가의 중앙당국)

Office of International Judicial Assistance  
U.S. Department of Justice  
1100 L Street, NW, Room 8102  
Washington, D.C. 20005  
United States of America

3. Person to whom the  
executed request is to  
be returned  
(집행된 요청서의 수신처)

National Court Administration  
(Attn: Director of International Affairs)  
219 Seocho-daero, Seocho-gu,  
SEOUL 06590  
the REPUBLIC OF KOREA

4. Specification of the date by which the requesting authority requires receipt of the response to the Letter of Request  
(촉탁당국의 요청서에 대한 회신이 언제까지 도착하기를 바라는지 구체적인 날짜를 기재하시기 바랍니다.)

Date  
(날짜)

Reason for urgency\*  
(긴급을 요하는 이유)

\* Omit if not applicable.  
(필요 없을 경우에는 삭제할 것)



**IN CONFORMITY WITH ARTICLE 3 OF THE CONVENTION,  
THE UNDERSIGNED APPLICANT HAS THE HONOUR  
TO SUBMIT THE FOLLOWING REQUEST:**

(협약 제3조에 따라 아래에 서명한 신청인은 다음의 촉탁서를 제출합니다.)

- |  |  |
|--|--|
| <p>5. a Requesting judicial authority (Article 3,a)<br/>(촉탁 사법 당국)<br/>(제3조 1)</p>   | Seoul Central District Court,<br>157, Seochojungang-ro, Seocho-gu,<br>SEOUL 06590<br>REPUBLIC OF KOREA |
| <p>b To the competent authority of (Article 3,a)<br/>(집행할 관할 당국)(제3조 1)<br/>(모르는 경우에는 기재하지 말 것.)</p>   |  |
| <p>c Names of the case and any identifying number<br/>(사건의 이름과 번호)</p>   | 2022GaDan5254447 Compensation for damage   |
| <p>6. Names and addresses of the parties and their representatives<br/>(including representatives in the requested State*) (Article 3,b)<br/>(당사자 및 변호인들의 이름과 주소(수탁 국가내의 변호인들 포함*)(제3조 2))</p> |  |
| <p>a Plaintiff<br/>(원고)</p>  | BAEK, JONGMIN<br>52, Nonhyeon-ro 159-gil, Gangnam-gu, Seoul,<br>Republic of Korea                      |
| <p>Representatives<br/>(변호인)</p>   | MIN KYUNG YOO, Attorney<br>10F, 725, Eonju-ro, Gangnam-gu, Seoul, Republic<br>of Korea                 |
| <p>b Defendant<br/>(피고)</p>  | The unknown and four others  |
| <p>Representatives<br/>(변호인)</p>   |  |
| <p>c Other parties<br/>(그 외)</p>   |  |
| <p>Representatives<br/>(변호인)</p>   |  |

\* Omit if not applicable.  
(필요 없을 경우에는 삭제할 것.)

<p>7. a Nature of the proceedings(divorce, paternity, breach of contract, product liability, etc.) (Article 3,c) (정차의 성격(이혼, 친자, 계약위반, 생산물 책임, 기타 등등))(제3조 3)</p>	<p>Compensation for damage</p>
<p>b Summary of complaint (소장(청구)에 대한 요약)</p>	<p>Defendants, by means of his or her Instagram account, insulted the plaintiff publicly and the plaintiff came to claim compensation for damages against the defendant since the Plaintiff suffered financial damage and mental distress due to the insult of the defendants.</p>
<p>c Summary of defence and counterclaim* (답변과 반소의 요약)</p>	
<p>d Other necessary information or documents* (그 외 필요한 정보 및 문서*)</p>	
<p>8. a Evidence to be obtained or other judicial act to be performed(Article 3,d) (취득할 증거 또는 이행 할 그 밖의 사법적 처분)(제3조 4)</p>	<p>1601 Willow Road, Menlo Park, California 94025 Meta Platforms, Inc.  Refer to the Attached documents (Application for the Order to Submit the Documents)</p>
<p>b Purpose of the evidence or judicial act sought (증거 또는 사법적 처분을 요청하는 목적)</p>	<p>Since the plaintiff is not aware of the defendants' identity for now and every piece of information to specify the identity of the defendants is being kept only by Meta Platforms, Inc., the order to submit the documents is required to specify the identity of the defendants.</p>
<p>9. Identity and address of any person to be examined (Article 3,e)* (신문 받을 자의 신원과 주소)* (제3조 5)*</p>	<p>Refer to the Attached documents (Application for the Order to Submit the Documents)</p>
<p>10. Questions to be put to the persons to be examined or statement of the subject matter about which they are to be examined (Article 3,f)* (신문받을 자에게 할 질문 또는 신문이 이루어질 소송물(주된내용)에 관한 설명)(제3조 6)*</p>	

\* Omit if not applicable.  
(필요 없을 경우에는 삭제할 것.)

11. Documents or other property to be inspected  
(Article 3,g)\*  
(증거조사가 이루어질 서류나 물건 (부동산, 동산 등)(제3조 7)\*)

12. Any requirement that the evidence be given on oath or affirmation and any special form to be used  
(Article 3,h)\*  
(증거가 선서 또는 서약에 의하여 제출되어야 하는 요건 및 사용될 특별한 형식)(제3조 8)\*)

13. Special methods or procedure to be followed (e.g. oral or in writing, verbatim, transcript or summary, cross-examination, etc.)  
(Articles 3, i)and 9)\*  
(따라야 하는 특별한 방식 또는 절차)  
(예: 말로 또는 글로, 말한 그대로 글로, 글로 옮긴 기록 또는 요약, 반대신문, 기타 등등)(제3조 9, 제9조)\*)

14. Request for notification of the time and place for the execution of the Request and identity and address of any person to be notified  
(Article 7)\*  
(촉탁서의 집행 시간과 장소를 관계 당사자 또는 대리인에게 알려 달라는 요청, 그리고 알려줘야 할 이의 신원과 주소)(제7조)\*)

15. Request for attendance or participation of judicial personnel of the requestion authority at the execution of the Letter of Request  
(Article 8)\*  
(촉탁서의 집행시에 촉탁 당국 법관의 출석 또는 참여 요청)(제8조)\*)

\* Omit if not applicable.  
(필요없을 경우에는 삭제할 것.)

16. Specification of privilege or duty to refuse to give evidence under the law of the State of origin (Article 11,b)\*  
(축타국의 법에 의하여 증거제출을 거부할 특권이나 의무)  
(제11조 2)\*

[Empty box for response to item 16]

17. The fees and costs incurred which are reimbursable under the second paragraph of Article 14 or under Article 26 of the Convention will be borne by\*  
(14조항과 26조항에 의한 요금과 비용의 상환 주체)

[Empty box for response to item 17]

DATE OF REQUEST

MAR. 14. 2023

SIGNATURE AND SEAL OF THE REQUESTING AUTHORITY

YOON SUNGHUN

윤성훈 

\* Omit if not applicable.  
(필요없을 경우에는 삭제할 것.)

SEOUL CENTRAL DISTRICT COURT

RULING

Case 2022GaDan5254447 Compensation for damage(Gi)

Plaintiff BAEK, JONGMIN (백종민)

Plaintiff's attorney: Min Kyung Yoo, Attorney for the Law Firm, "THEON, LLC"

Defendant The unknown and four others

Documents holder As presented in the attachment

TEXT

The documents holder shall submit the following documents to this court within 7 days from the receipt date of this ruling.

Document: As presented in the attachment.(Limited to Paragraph 1 of the indications in the attachment)

REASONING

Since the application for the order to submit the documents, in this case, is deemed justifiable, the ruling has been made as the text.

March 13, 2023

Judge SUNGHUN YOON



Seoul Central District Court 2022GaDan5254447 Compensation for damage(Gi) the same as the original submitted on Feb. 15, 2023

## Application for the Order to Submit the Documents

Case 2022GaDan5254447 Compensation for Damage(Gi) [Court in charge: Civil 31 Single]

Plaintiff BAEK, JONGMIN (백종민)

Defendant The unknown and four others

In order to prove the alleged facts for the case above, the plaintiff applies for the order to submit documents as follows.

### Indication of Documents

1. Information (names, dates of birth, e-mail addresses, and cell phone numbers) and the last 3 months' IP addresses about those subscribers whose Instagram accounts are "dr.jaylee\_jumull\_", "\_the\_battle\_against\_insta.gram", "ssam.ja.3333", "o\_mark\_n\_rona\_o", and "lavita\_miruku.hime".
2. Whether there are other accounts created by the subscribers whose accounts are "dr.jaylee\_jumull\_", "\_the\_battle\_against\_insta.gram", "ssam.ja.3333", "o\_mark\_n\_rona\_o", or "lavita\_miruku.hime". If there is any, the name of the accounts and all the information of the account(s).

### Gist of the Documents

Defendants, by means of their Instagram accounts, insulted the plaintiff publicly and the plaintiff came to file this case since the Plaintiff suffered financial damage and mental distress due to the insult of the defendants. Meanwhile, the plaintiff is not aware of each defendant's identity for now, and every piece of information to specify the identity of the defendants is being kept only by Meta Platforms, Inc[Attachment 1. Instagram Help Center - Information for the judicial authorities].

## Holder of Documents

Meta Platforms, Inc

Address: 1601 Willow Road, Menlo Park, California 94025

## FACTS TO BE PROVED

In order to specify the identity of the defendants in this case.

## CAUSES for the DUTY of SUBMITTING DOCUMENTS

### ① Types

- Documents quoted in the litigation by a party (quoted documents)
- The applicant has the legal right to demand a handover or reading of the documents from the person who holds them (handover, reading of documents)
- Documents were made for the benefit of the applicant (beneficial documents)
- Documents were made under the legal relations between the applicant and the person who holds the documents (legal relations documents)
- Other documents that need to be submitted (reason:)

## ATTACHMENTS

1. Instagram Help Center - Information for the judicial authorities
2. Defendant 1's posting
3. Defendant 2's posting
4. Defendant 3's posting



Seoul Central District Court 2022GaDan5254447 Compensation for damage(Gi) the same as the original submitted on Feb. 15, 2023

5. Defendant 4's posting

6. Defendant 5's posting

February 15, 2023

An Attorney for the Plaintiff

Law Firm, "THEON, LLC"

MIN KYUNG YOO, Attorney

To Seoul Central District Court



## Submission of Requests

Online:

Law enforcement officials may use the Law Enforcement Online Request System for the submission, tracking and processing of requests. A government-issued email address is required to access the Law Enforcement Online Request System.

Please note:

For U.S. Law Enforcement:

Law enforcement officials seeking Instagram account records must address their request to:

Meta Platforms, Inc.,  
1601 Willow Road,  
Menlo Park, CA 94025.

For Law Enforcement outside of the U.S.:

Please note that for users of the Instagram services in the European region, the service provider and data controller is Meta Platforms Ireland Ltd. If your request is for Meta Platforms Ireland Ltd., it must be addressed to:

Meta Platforms Ireland Ltd.,  
4 Grand Canal Square  
Dublin 2, Ireland.

For Instagram users in countries outside of the European region, the service provider is Meta Platforms, Inc., please ensure that any requests for Instagram or Facebook user data are correctly addressed to:

Meta Platforms, Inc.  
1601 Willow Road,  
Menlo Park, CA 94025.

Seoul Central District Court 2022GaDan5254447 Compensation for damage(Gi) the same as the original submitted on Feb. 15, 2023



**dr.jaylee\_jumull\_@mrs\_mulb.\_**

Her appearance has already no goddam class whatsoever, so the prices of clothing are also outrageous. What the fuck, a motherless bitch!

87 Weeks 8 Likes Reply Send

Seoul Central District Court 2022GaDan5254447 Compensation for damage(Gi) the same as the original submitted on Feb. 15, 2023



**\_the\_battle\_against\_insta.gram**

What's the use of success? The mind is a dickhead

50 Weeks 1 Like Reply Send



**\_the\_battle\_against\_insta.gram** What the hell, you're shitting



**\_the\_battle\_against\_insta.gram**

[@o\\_mark\\_n\\_rona\\_o](#) Goddam freak show

20 Weeks 1 Like Reply Send

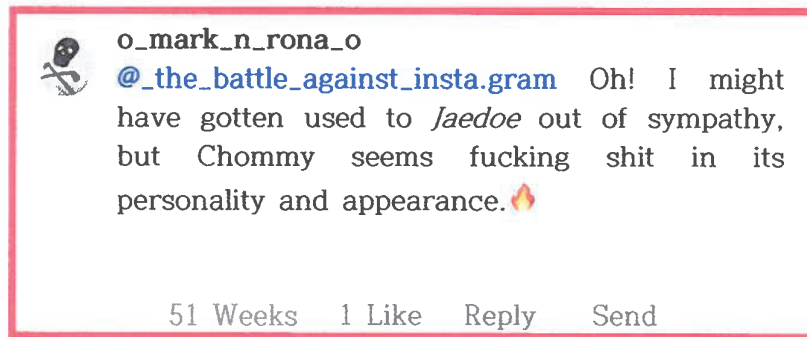
Seoul Central District Court 2022GaDan5254447 Compensation for damage(Gi) the same as the original submitted on Feb. 15, 2023



**ssam.ja.3333** The goddam detergent is fucking delayed every time. Go bankrupt! I enjoy using detergents made by big companies. Not gonna use yours, fucking bitch!

50 Weeks 5 Likes Reply Send

Seoul Central District Court 2022GaDan5254447 Compensation for damage(Gi) the same as the original submitted on Feb. 15, 2023



Seoul Central District Court 2022GaDan5254447 Compensation for damage(Gi) the same as the original submitted on Feb. 15, 2023



**lavita\_miruku.hime** [@ssam.ja.3333](#) Isn't it true that The Chommy is countrified? What's wrong with calling something countrified to be countrified?? 😊 Considering an ugly person wearing this may look that much good, aren't people buying this with the thought they would look better wearing this than the ugly person? It's fucking funny to rip people off by doing this fucking shit.

71 Weeks 8 Likes Reply Send



### LOHAS Certified Public Translator Office

Address: (06611) KI tower 10F 109, Gangnam-daero 69-gil 8, Seocho-gu, Seoul, Republic of Korea, Tel:+82 010-2957-1846, E-mail:lohas-office@naver.com

## CERTIFICATE OF TRANSLATION

In accordance with the Licensed Administrative Agent Act (Law No. 17394 amended on June 10th, 2021) of the Republic of Korea, a certified public translator & licensed administrative agent is duly authorized to prepare, confirm and translate foreign documents submitted to public offices into Korean or Korean documents issued by administrative offices into foreign language and vice versa (Article 2), and may issue an attestation of translation for any document translated by him/her(Article 20).

No. 23-0322-01

Date: March 22, 2023

Title of Document : Court Ruling

Name of Requester : BAEK, JONGMIN

I, the below signed **AHN, MAGHNGYU**, Certified Public Translator & Licensed Administrative Agent by the Ministry of the Interior and Safety, DO HEREBY CERTIFY:

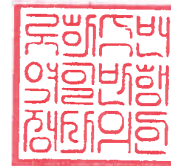
that the attached documents were prepared and translated by me at the request of the above named person who has duly appeared and confirmed the contents of the documents at my office;

that to the best of my knowledge, the documents were prepared and translated accurately for the public purpose of use for international businesses, immigration, or overseas studies, etc, in accordance with the relevant regulations and laws.

IN TESTIMONY Whereof, I have hereunto subscribed my name and affixed my seal of office.



안민구



**AHN, MAHNGYU**

Certified Public Translator & Licensed Administrative Agent  
Registration No. 18302025406



## SWORN STATEMENT (AFFIDAVIT)

AUTHORITY: Article 2 and 20 of the Licensed Administrative Agent Act (Law No. 17394)  
of the Republic of Korea

USES: This sworn statement may be submitted to foreign government institution, immigration, immigration office, educational institution, law enforcement agencies, customs, recruitment, and other related institutions, attached to the original document(s) and its translated document(s).

I, **AHN, MAHNGYU**, being duly sworn, hereby depose and say:

that I am authorized as a Certified Public Translator and a Licensed Administrative Agent (license No. 18302025406) by the Ministry of the Interior and Safety of Korea;

that I have translated the attached document(s) from Korean into English;

that this copy is true and correct to the original;

that it is a true and correct translation to the best of my knowledge, ability and belief;

that I have strictly prepared the attached document(s) and issued a certificate of translation in accordance with the relevant Korean laws and regulations including the Licensed Administrative Agent Act and the Personal Information Protection Act.



signed by: AHN, MAHNGYU as of March 22, 2023

LOHAS Certified Public Translator & Licensed Administrative  
Agent Office

Address: (06611) KI tower 10F 109, Gangnam-daero 69-gil 8, Seocho-gu, Seoul,  
Republic of Korea,

Phone: +82 010-2957-1846, E-mail: lohas-office@naver.com

## 서울중앙지방법원

### 결 정

사 건 2022가단5254447 손해배상(기)

원 고 백종민

원고 소송대리인 법무법인(유한)더온 담당변호사 유민경

피 고 성명불상자 외 4명

문서소지인 별지와 같음

### 주 문

문서소지인은 이 결정을 받은 날로부터 7일 이내에 다음 문서를 이 법원에 제출하라.

문서의 표시 : 별지와 같음.(단, 별지 문서의 표시 중 제1항에 한함)

### 이 유

이 사건 문서제출명령 신청은 이유 있으므로 주문과 같이 결정한다.

2023. 3. 13.

판사

윤성현



## 문서제출명령신청서

사 건 2022가단5254447 손해배상(기) [담당재판부:민사 31단독]  
원 고 백종민  
피 고 성명불상자 외 4명

위 사건에 관하여 원고는 주장사실을 증명하기 위하여 아래와 같이 문서의 제출명령을 신청합니다.

### 문서의 표시

1. 인스타그램 계정 "dr.jaylee\_jumull\_", "\_the\_battle\_against\_insta.gram", "ssam.ja.3333", "o\_mark\_n\_rona\_o", "lavita\_miruku.hime"의 각 가입자 정보(이름, 생년월일, 이메일, 휴대전화번호 등) 및 최근 3개월 동안의 IP 주소.
2. 위 "dr.jaylee\_jumull\_", "\_the\_battle\_against\_insta.gram", "ssam.ja.3333", "o\_mark\_n\_rona\_o", "lavita\_miruku.hime" 계정의 가입자가 생성한 또다른 계정이 있는지 여부. 있다면 해당 계정명 및 계정 정보 일체.

### 문서의 취지

피고들은 자신들의 인스타그램 계정을 이용하여 원고를 공연히 모욕하였고, 원고는 피고들의 모욕행위로 인해 재산상 손해 및 정신적 고통을 입게 되어 이 사건 청구에 이르게 되었습니다. 다만 현재 원고는 피고들의 신상에 관하여 알지 못하고, 피고들의 인적사항을 특정하기 위한 정보 일체는 오직 인스타그램의 모회사인 메타 플랫폼스(Meta Platforms, Inc.)만이 보관하고 있습니다[첨부서류 1. 인스타그램 고객센터 - 사법당국을

위한 정보].

### 문서를 가진 사람

Meta Platforms, Inc.

주소 : 1601 Willow Road, Menlo Park, California 94025

### 증명할 사실

이 사건 피고들의 인적사항을 특정하기 위함입니다.

### 문서제출의무의 원인

#### ① 해당유형

- 당사자가 소송에서 인용한 문서(인용문서)
- 신청자가 문서를 가지고 있는 사람에게 그것을 넘겨달라고 하거나 보겠다고 요구할 수 있는 사법상의 권리를 가지고 있음(인도, 열람문서)
- 문서가 신청자의 이익을 위하여 작성되었음(이익문서)
- 문서가 신청자와 문서를 가지고 있는 사람사이의 법률관계에 관하여 작성된것임(법률관계문서)
- 그밖에 제출이 필요한 문서( 사유 : )

### 첨 부 서 류

1. 인스타그램 고객센터-사법당국을 위한 정보
2. 피고 1. 게시글
3. 피고 2. 게시글
4. 피고 3. 게시글

5. 피고 4. 게시글

6. 피고 5. 게시글

2023.02.15

원고 소송대리인

법무법인(유한)더온

담당변호사 유민경

서울중앙지방법원 귀중



## 요청 제출

온라인:

사법당국 직원은 사법당국용 온라인 요청 시스템을 사용하여 요청을 제출, 추적, 처리할 수 있습니다. 사법당국용 온라인 요청 시스템에 액세스하려면 정부에서 발급한 이메일 주소가 필요합니다.

다음 내용을 참고하세요.

미국 사법당국:

Instagram 계정 기록을 요청하는 사법당국 직원은 다음 주소로 요청을 보내야 합니다.

Meta Platforms, Inc.,  
1601 Willow Road,  
Menlo Park, CA 94025.


미국 외 지역의 사법당국:

유럽 지역의 Instagram 서비스 사용자의 경우 서비스 제공업체 및 데이터 관리자는 Meta Platforms Ireland Ltd.입니다. Meta Platforms Ireland Ltd.에 대한 요청인 경우 다음 주소로 요청을 보내야 합니다.


Meta Platforms Ireland Ltd.,  
4 Grand Canal Square  
Dublin 2, Ireland.

유럽 지역 외 국가의 Instagram 사용자의 경우 서비스 제공업체는 Meta Platforms, Inc.입니다. Instagram 또는 Facebook 사용자 데이터에 대한 요청은 다음 주소로 올바르게 보내야 합니다.


Meta Platforms, Inc.  
1601 Willow Road,  
Menlo Park, CA 94025.

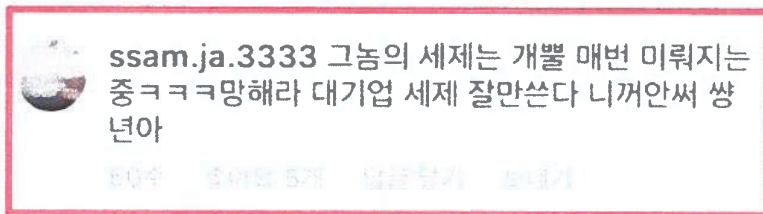
 dr.jaylee\_jumull\_@mrs\_mulb\_ 이미  
와꾸가 근본없어서 웃가격도 애미없나봐ㅋㅋ  
ㅋㅋㅋㅋ 에레이 씨팔 애미뒤진년  
87주 [답변](#) [답변](#) [답변](#) [답변](#) [답변](#)



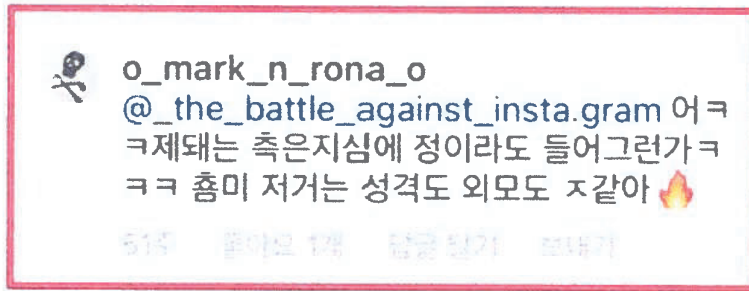
 **\_the\_battle\_against\_insta.gram** 출세  
하면 뭐해. 마인드가 버스  
504 좋아요 1개 댓글 0개 보내기

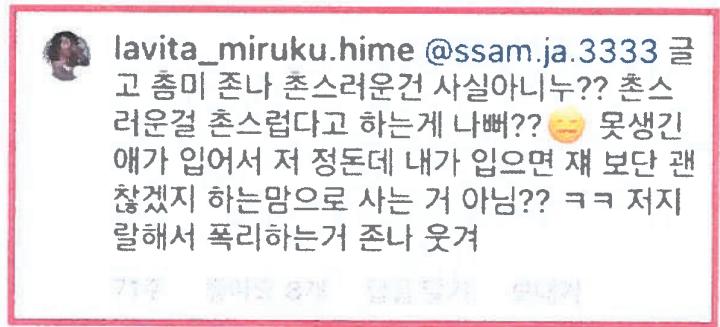
 **\_the\_battle\_against\_insta.gram** 지를 똥싸고 있네

 **\_the\_battle\_against\_insta.gram**  
**@o\_mark\_n\_rona\_o** 지르엄봉하네  
207 좋아요 1개 댓글 0개 보내기



서울중앙지법 2022가단5254447 손해배상(기) 2023.02.15 제출 원본과 상위 없음





# Exhibit C

**From:** [Roberts, Emma \(DAL\)](#)  
**To:** [Wolinsky, Benjamin \(USACAN\)](#)  
**Cc:** [Mrazik, Ryan T. \(SEA\)](#)  
**Subject:** [EXTERNAL] RE: Meta Platforms, Inc. - Request for Int'l Judicial Assistance  
**Date:** Friday, August 4, 2023 9:50:54 AM

---

Hi Ben,

Thank you for your email and apologies for my delayed response. I am adding my colleague, Ryan Mrazik, since I am out of office next week. Perkins is not authorized to accept service on Meta's behalf for this request. Please send the letter to Meta's registered agent.

Regards,  
Emma

**Emma Roberts** | **Perkins Coie LLP**

ASSOCIATE

500 N. Akard Street Suite 3300

Dallas, TX 75201

D. +1.469.801.2305

E. [EmmaRoberts@perkinscoie.com](mailto:EmmaRoberts@perkinscoie.com)

*Upcoming OOO: Monday, August 7 – Friday, August 11*

---

**From:** Wolinsky, Benjamin (USACAN) <Benjamin.Wolinsky@usdoj.gov>  
**Sent:** Friday, August 4, 2023 11:44 AM  
**To:** Roberts, Emma (DAL) <EmmaRoberts@perkinscoie.com>  
**Subject:** Re: Meta Platforms, Inc. - Request for Int'l Judicial Assistance

Dear Ms. Roberts:

Will Meta be responding to DOJ's letter from two weeks ago?

Thank you,  
Ben

---

**From:** Wolinsky, Benjamin (USACAN) <[BWolinsky@usa.doj.gov](mailto:BWolinsky@usa.doj.gov)>  
**Sent:** Thursday, July 20, 2023 3:24 PM  
**To:** [emmaroberts@perkinscoie.com](mailto:emmaroberts@perkinscoie.com) <[emmaroberts@perkinscoie.com](mailto:emmaroberts@perkinscoie.com)>  
**Subject:** Meta Platforms, Inc. - Request for Int'l Judicial Assistance

Dear Ms. Roberts:

My name is Ben Wolinsky; I'm an Assistant U.S. Attorney in the Northern District of California.

Attached is a letter concerning a request for international judicial assistance directed to your client, Meta Platforms, Inc.

Please feel free to contact me to discuss.

Best,

Ben Wolinsky

Assistant United States Attorney

Northern District of California

450 Golden Gate Avenue, 9th Floor

San Francisco, CA 94102

T: 415-436-6996

F: 415-436-6748

---

NOTICE: This communication may contain privileged or other confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

# Exhibit D



1 ISMAIL J. RAMSEY (CABN 189820)  
United States Attorney  
2 MICHELLE LO (NYRN 4325163)  
Chief, Civil Division  
3 BENJAMIN J. WOLINSKY (CABN 305410)  
Assistant United States Attorney

4 450 Golden Gate Avenue, Box 36055  
5 San Francisco, California 94102-3495  
6 Telephone: (415) 436-6996  
7 Facsimile: (415) 436-6748  
8 Email: benjamin.wolinsky@usdoj.gov

9 Attorneys for the United States of America

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN JOSE DIVISION

13 IN THE MATTER OF THE REQUEST FOR ) Case No.  
14 JUDICIAL ASSISTANCE FROM THE )  
15 SEOUL CENTRAL DISTRICT COURT NO. )  
16 157 IN THE REPUBLIC OF KOREA IN THE )  
17 MATTER OF JONGMIN BAEK V. )  
18 UNKNOWN DEFENDANTS. )

19 **COMMISSIONER’S SUBPOENA**

20 To: Meta Platforms, Inc.  
21 Corporation Service Co.  
22 2710 Gateway Oaks Drive, Suite 150N  
23 Sacramento, CA 95833

24 I, Benjamin J. Wolinsky, an Assistant United States Attorney for the Northern District of  
25 California, acting under the authority of Title 28, United States Code, Section 1782, for the purpose of  
26 rendering assistance to the Republic of Korea, command that you provide to me evidence for use in a  
27 civil lawsuit in the Seoul Central District Court No. 157, in Seoul, Republic of Korea, entitled *Jongmin  
28 Baek v. Unknown Defendants*, Foreign Reference Number No. 2023-F-1109, said evidence being:

- 1. Names, dates of birth, e-mail addresses, cell phone numbers, and the last three months’ IP addresses about those subscribers whose Instagram accounts are “dr.jaylee\_ju\_mull,”

1 “\_the\_battle\_against\_insta.gram,” “ssam.ja.333,” “o\_mark\_n\_rona\_o,” and  
2 “lavita\_miruku.hime”.

- 3 2. Whether there are other accounts created by the subscribers whose accounts are  
4 “dr.jaylee\_ju\_mull,” “\_the\_battle\_against\_insta.gram,” “ssam.ja.333,” “o\_mark\_n\_rona\_o,”  
5 and “lavita\_miruku.hime”. If there [are] any, the name of the accounts and all [of] the  
6 information of the account(s).

7 If you cannot produce a requested document or information (including, *inter alia*, because the  
8 document or information has been lost or destroyed), please provide the facts you rely upon in support  
9 of your contention that you cannot do so. To the extent a document or piece of information is not  
10 produced because of an assertion of privilege, please state the specific privilege relied upon. If you  
11 object to producing only part of a requested document or piece of information, please produce that  
12 portion of the document or piece of information that you do not object to producing and indicate what  
13 portion you have withheld based on an assertion of privilege.

14 Please produce the evidence by email to me at [benjamin.wolinsky@usdoj.gov](mailto:benjamin.wolinsky@usdoj.gov) or by mail at the  
15 address set forth above no later than October 10, 2023.

16 For failure to provide said evidence, you may be deemed guilty of contempt and liable to  
17 penalties under the law. The recipient of the attached subpoena may, for good cause shown, oppose the  
18 giving of evidence, or the circumstances thereof, by motion timely filed with the Court.

19  
20 Dated this \_\_\_\_\_ day of September 2023.

21  
22  
23  
24 \_\_\_\_\_  
25 BENJAMIN J. WOLINSKY  
26 Commissioner  
27  
28