

2:25-mc-9003-SRB

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

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WEST DIST. OF MO  
KANSAS CITY, MO

**IN RE PETITION OF**

John Thomas,

2111 Bagnell Dam Blvd #2465

Lake Ozark, MO 65049

Petitioner, Pro Se

v.

**META PLATFORMS, INC.**

151 N. First Street, San Jose, CA 95113

Respondent.

**VERIFIED PETITION TO PERPETUATE TESTIMONY AND PRESERVE  
ELECTRONIC EVIDENCE PURSUANT TO FED. R. CIV. P. 27(a)**

**I. JURISDICTION AND VENUE**

1. This Court has subject-matter jurisdiction under 28 U.S.C. § 1332(a). Petitioner is a citizen of Missouri; Meta is a Delaware corporation with its principal place of business in California; and the amount in controversy exceeds \$75,000 exclusive of interest and costs.

2. Venue is proper in this District under Fed. R. Civ. P. 27(a)(1) because, on information and belief, one or more individuals who published the defamatory statements reside in the Western District of Missouri and the related conduct—including stalking, trespassing, and property damage—occurred at Petitioner's residence in Camden County, Missouri.

## **II. PARTIES**

3. Petitioner John Thomas is an adult resident of Camden County, Missouri.
4. Respondent Meta Platforms, Inc. is a Delaware corporation with headquarters at 151 N. First Street, San Jose, CA 95113. Meta operates Facebook and is custodian of the electronic evidence sought herein.

## **III. FACTUAL BACKGROUND**

5. Between January 1, 2019 and the present, unknown Facebook users published statements in Lake Ozark–area community Facebook groups concerning alleged incidents involving Petitioner.
6. The statements referenced Petitioner’s home location and characterized him as a danger to the community, including false allegations that he brandished a weapon or was under criminal investigation.
7. Petitioner believes these posts have resulted in stalking, trespassing, and damage to his property, including the destruction of a surveillance camera that had captured prior incidents, creating a serious safety concern.
8. Several of the posts appear to have been edited or deleted; Petitioner cannot access the original content or identify the posters without Meta’s assistance.
9. Meta’s retention of certain deleted content is time-limited; underlying posts, edit/deletion logs, and account data risk permanent loss without immediate preservation.
10. Petitioner has partial screenshots but lacks the metadata and account identifiers necessary to identify the publishers and plead a defamation complaint.

## **IV. INTENDED ACTION AND INABILITY TO PRESENTLY SUE**

11. Petitioner intends to bring civil claims under Missouri law (including defamation, false light, and intentional infliction of emotional distress) against the anonymous individuals (Doe Defendants) once their identities are known.
12. Without Meta’s disclosure, Petitioner cannot ascertain the Doe Defendants’ names or service addresses and therefore cannot presently sue.

## **V. RULE 27(a) REQUIREMENTS**

13. Subject matter of expected action: defamation and related torts arising from false statements of criminality and threats.

14. Facts to be established: the content, timing, and origin of each post; and the identities, contact information, and IP logs tied to each posting account.

15. Reasons to perpetuate testimony: the evidence is exclusively within Meta's control and at risk of loss; preservation will prevent a failure or delay of justice. Fed. R. Civ. P. 27(a)(3).

16. Person to be examined: Custodian of Records, Meta Platforms, Inc., 151 N. First Street, San Jose, CA 95113.

17. Requests: (a) Full text of posts listed in Exhibit A, including edit histories and deletion logs; (b) all associated media; (c) account-registration data (name, email, phone) for the posting accounts; and (d) login/IP logs for the period January 1, 2019–present.

## **VI. NOTICE**

18. Petitioner will serve Meta with a preservation letter and a copy of this Petition via the Law Enforcement Online Request System (LEORS) and by certified mail.

19. Petitioner will seek leave to serve any order on Doe Defendants by email, Facebook direct message, or group posting to the extent feasible.

## **VII. PRAYER FOR RELIEF**

WHEREFORE, Petitioner respectfully requests that the Court:

(A) Set a hearing and require Meta to show cause why the requested discovery should not be permitted;

(B) Order Meta to preserve and, within 21 days, produce the items in Paragraph 17 limited to Exhibit A;

(C) Authorize issuance of a subpoena duces tecum under Rule 45; and

(D) Grant all other just relief.

Respectfully submitted,

John Thomas

2111 Bagnell Dam Blvd #2465

Lake Ozark, MO 65049

Tel: 573-356-6435 Email: [thomasjohn081@gmail.com](mailto:thomasjohn081@gmail.com)

**VERIFICATION**

I, John Thomas, declare under penalty of perjury that the foregoing is true and correct.

/s/ John Thomas

Date: 9/6/25