

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

10-1910

D.J. GOODSON,
Plaintiff,

Civil Action No.

Vs.

KIM KARDASHIAN, KOURTNEY KARDASHIAN &
KHLOE KARDASHIAN-ODUM,
Defendants.

42 U.S.C. Section 1983
COMPLAINT

Filed on behalf of:

D.J. GOODSON
PRO SE - PLAINTIFF

#GW 1171 (SCI MAHANOV)
301 MOREA ROAD
FRACKVILLE, PA 17932
(570) 773-2158

JURY TRIAL DEMANDED

September 10, 2010

FILED
SCRANTON

SEP 13 2010

Per _____
DEPUTY CLERK

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JURISDICTION AND VENUE

1. Jurisdiction is conferred by 28 U.S.C. Section 1331 and by 28 U.S.C. Section 1343(a) which authorizes federal courts to hear actions brought under 42 U.S.C. Section 1983.
2. The principles of pendant jurisdiction are hereby engaged for combining remedies under Section 1983 with state law remedies for state law claims.
3. Venue is proper in this court because plaintiff is a Pennsylvania resident, and "Keeping up with the Kardashians" and "Kourtney & Khloe take Miami" in which are broadcasted on "E!" (Entertainment Television Network) throughout the State of Pennsylvania. The business and actions of the defendants are broadcasted in Schuylkill County, Pennsylvania (Middle District of Pennsylvania) in which the plaintiff currently resides.
4. Venue is appropriate in this court pursuant to 28 U.S.C. Section 1391(b)(1).
5. Jurisdiction is further conferred by 28 U.S.C. Section 1332, the diversity statute. Once diversity jurisdiction has been engaged this court becomes vested with authority to entertain all claims predicated upon state law, as well as all claims arising under Section 1983.

6. The Prison Litigation Reform Act, 42 U.S.C. Section 1997, under the facts and circumstances of this matter do not apply. Accordingly the PLRA exhaustion requirement does not apply. Plaintiff seeks declaratory relief pursuant to 28 U.S.C. Sections 2201 and 2202.

PARTIES

7. The plaintiff is D.J. Goodson, currently an inmate located at Pennsylvania Department of Corrections, State Correctional Institution at Mahanoy "SCI MAHANOY", located at 301 Morea Road, Frackville, Pennsylvania 17932 (Schuylkill County), (570) 773-2158, Pennsylvania Department of Corrections Inmate Identification Number GW 1171.

8. The Defendants are Kim Kardashian, Kourtney Kardashian and Klohe Kardashian-Odum who are individuals who appear on the television broadcasted by "E!" Entertainment Television Network located at 5750 Wilshire Boulevard Los Angeles, California 90036. The Defendants addresses are undisclosed for purposes of this matter all correspondences will be in care of "E!" at above stated address.

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS OR IN THE ALTERNATIVE
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

9. During the months of July through August 2010, the defendants appeared on "E!" in there reality shows in which consisted of numerous episodes in which included the replaying of all episodes in season two of the above stated shows.

10. The defendants appeared as themselves in reality, it should be noted these defendants were not acting during these recorded and broadcasted shows.

11. During season two the defendants engaged in disturbing acts of

violence and racially prejudicial acts in which they knew would affect the plaintiff psychologically and emotionally.

12. Upon viewing all season two episodes the plaintiff exhibited disturbing behavior to include abnormal conversation to others as a result of the viewing the defendants engage in such abusive and disturbing actions.

13. Defendants intended there actions to cause plaintiff to suffer extreme emotional distress due to their outrageousness of actions involving violence (domestic abuse) to include a boxing match in which a handicapped individual observed the abuse of defendant Kim Kardashian. The many domestic and emotional abuses involving Kourtney Kardashian by her paramour Scott. Defendant Khloe Kardashian on one occasion referred to a babydoll as being "the black baby".

14. Defendants actions amounted to a physical manifestation of the emotional distress of plaintiff.

15. It is expected that discovery will provide for more evidence as to some of the mentioned acts by these defendants as each individual instant of harm is voluminous and for judicial economy plaintiff incorporates as part of this complaint the entire season two of both above mentioned programs in which were viewed by plaintiff during the months of July through August 2010.

16. Defendants sexually explicit actions intertwined with domestic abuse, fights of violence, extensive use of abusive language, sexual content and innuendo, nudity, outright disrespectful and disturbing actions, no respect for the law, and plain senseless and stupid actions, comments, behaviors, etc. as a result of defendants conduct the plaintiff suffered from mental anguish, embarrassment, shame and humiliation and continues

to suffer from nervousness, anger issues in which continues as to plaintiff suffering.

WHEREFORE, plaintiff demands judgment against defendants in an amount in excess of \$75,000.00 for compensatory and punitive damages, plus interest and costs.

Declaratory relief declaring the actions of defendants in which continue be deemed outrageous and subjected to cause emotional distress and to provide relief to prevent future damages by defendants.


Implementation of a third party to monitor defendants actions to prevent further harm to plaintiff who is a viewer or provide warnings prior to airing any episode in which defendants causes emotional distress by and through their unmonitored and unrestricted behaviors, comments and actions.

It is furthered requested that all defendants offer a sincere apology for their actions to plaintiff on both above mentioned broadcasts as follows "D.J. we are sorry for emotionally stressing you out & we love you!"

Any other relief this Court deems proper and fit.

JURY TRIAL DEMANDED.

Respectfully submitted,



D. J. Goodson
Pro Se Plaintiff
#CW 1171 (SCI MAHANAY)
301 MOREA ROAD
FRACKVILLE, PENNSYLVANIA 17932
(570) 773-2158

Dated: September 10, 2010

VERIFICATION

I hereby verify that the foregoing statements are true and correct to the best of my knowledge, information and belief. Any false statements are subject to the penalties of perjury.

Dated: September 10, 2010



D.J. Goodson, ~~Attorney~~ Plaintiff
ADV 1171 (SCI MAHANAY)
301 Moran Road
Pottsville, PA 17932
(570) 773-2158

CERTIFICATION

I hereby certify that a true and correct copy of the foregoing COMPLAINT has been mailed via U.S.P.S., first-class mail, postage prepaid on the date below to the parties below:

**KIM KARDASHIAN, KOURTNEY KARDASHIAN &
KHALO KARDASHIAN-ODUM
C/O "E!" Entertainment Television
Attention: Executive Producers
3750 Wilshire Blvd.
Los Angeles, California 90036**

Dated: September 10, 2010


B.J. Goodson, Esq., Attorney

POV 1171 (BY ALBANY)
301 Morris Road
Pottsville, PA 17932
(870) 773-2158



Daniel Joseph Goodson, III



SCI MAHANOY (GW 1171)
301 Morea Road
Frackville, PA 17932
(570) 773-2158
Temporary Mailing Address

Please Reply To:
Frackville, PA
New Kensington, PA
dgoodson@hotmail.com

1312 Woodmont Avenue
Post Office Box 303
New Kensington, PA 15068
(724) 335-3812
Permanent Mailing Address

September 10, 2010

CLERK, U.S.D.C. M.D. PA
P.O. Box 1148
Scranton, PA 18501-1148

RE: Goodson vs. Kondashew, et al
(Civil Action Complaint)

Dear Clerk:

Please find and file 1 original and 1 copy of Complaint for Civil Action, I.F.P. forms, U.S. Marshal forms and 3 service copies as well as other necessary forms for action in this matter.

Sincerely,

D. J. Goodson

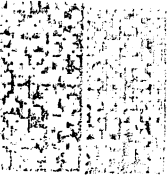
Pro Se - Plaintiff

Enclosures

DJG III

cc: file





POSTAGE METERS
154
AMER

NAME Daniel Goodson
NUMBER 641171

301 MOREA ROAD
FRACKVILLE, PA 17932

Legal mail

Clerk
P.O. Box 1148
Scranton, PA 18501-1148