

Form 35

No. S-240157  
Vancouver Registry

*In the Supreme Court of British Columbia*

Between

**Masood Masjoody**

Plaintiff

and

**Reza Pahlavi, X Corp., John Doe 1, John Doe 2, John Doe 3, John Doe 4, John Doe 5,  
John Doe 6, John Doe 7, John Doe 8, John Doe 9, John Doe 10, John Doe 11, Arash  
Kamancheh, Maryam Lagertha, Sedigheh Minachi, Azar Khorramshahi**

Defendants

**ORDER MADE AFTER APPLICATION**

BEFORE ) *ASSOCIATE JUDGE MWIR* )  
          ) THE HONOURABLE JUSTICE ..... ) 09/May/2025  
          ) )  
          ) )

ON THE APPLICATION of the Plaintiff, **Masood Masjoody**, coming on for hearing at Vancouver Courthouse, 800 Smithe Street, Vancouver, BC on 09/May/2025 and on hearing the Plaintiff, **Masood Masjoody**,

THIS COURT ORDERS that:

1. ~~The Plaintiff is granted leave to commence contempt proceedings against John Doe Defendants 1, 3, 6, and 7 for non-compliance with:~~
  - a. the Order issued August 16, 2024, in these proceedings; and
  - b. ~~the Order issued September 17, 2024, in these proceedings.~~

2. The Plaintiff shall serve this Order and the Notice of Application appended as Schedule "A" to this Order, in the manner required by the Order of Madam Justice Warren dated June 27, 2024;
3. The Plaintiff shall file Schedule "A" to this Order subsequent to the issuance of this Order;
4. Until further order of the Court, the Plaintiff is permitted to serve court materials on the John Doe Defendants in the manner authorized by the Order of Madam Justice Warren dated June 27, 2024.

*5. The materials are to be served by Monday, May 12, 2025 at 4:00pm. [Signature]*

THE FOLLOWING PARTIES APPROVE THE FORM OF THIS ORDER AND CONSENT TO EACH OF THE ORDERS, IF ANY, THAT ARE INDICATED ABOVE AS BEING BY CONSENT:

*Masood Masjoody*  
.....  
Signature of  
☒ party ☐ lawyer for .....

.....*Masood Masjoody*.....

By the Court.  
[Signature]  
.....  
Registrar

[Circular Stamp with "KM"]

FORM 32 (RULE 8-1 (4))

No. S-240157  
Vancouver Registry

*In the Supreme Court of British Columbia*

BETWEEN:

**Masood Masjoody**

Plaintiff

AND:

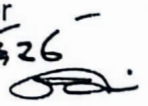
**Reza Pahlavi, X Corp., John Doe 1, John Doe 2, John Doe 3, John Doe 4, John Doe 5,  
John Doe 6, John Doe 7, John Doe 8, John Doe 9, John Doe 10, John Doe 11, Arash  
Kamancheh, Maryam Lagertha, Sedigheh Minachi, Azar Khorramshahi**

Defendants

## NOTICE OF APPLICATION

**Name of Applicant:** MASOOD MASJOODY (the "Plaintiff")

**To:** Without Notice.

TAKE NOTICE that an application will be made by the applicant to the presiding judge or associate judge at **800 Smithe Street, Vancouver, British Columbia V6Z2E1**, on **May 26, 2025**, at **9:45 AM** for the order(s) set out in Part 1 below. 

The applicant estimates that the application will take: 60 minutes.

This matter is not within the jurisdiction of an associate judge.

### Part 1: ORDER(S) SOUGHT

1. An order that John Doe Defendants 1, 3, 6, and 7 be held in contempt of court for failing to comply with the Order issued August 16, 2024;
2. An order that John Doe Defendants 1, 3, 6, and 7 be held in contempt of court for failing to comply with the Order issued September 17, 2024;
3. Such further or other relief as the Honourable Court may deem just.

**Part 2: FACTUAL BASIS**

1. **Identification Order:** On August 16, 2024, the Court issued an Identification Order directing John Doe Defendants 1 through 11 to file and serve affidavits within 10 days disclosing their full legal names and contact information, including valid email addresses for service. The Identification Order was served on the John Doe defendants on August 16, 2024. **Those defendants have not complied with that order.**
2. **Removal Order:** On September 17, 2024, the Court issued an order prohibiting certain John Doe defendants from publishing any defamatory statement concerning the plaintiff and requiring them to remove certain posts published on X (formerly Twitter). The Removal Order was served on these John Doe defendants on September 17, 2024. Despite the Court's directive, **those defendants have failed to comply** and those posts remain live and publicly accessible, continuing to cause harm to the Plaintiff.
3. These orders were issued in light of serious ongoing misconduct by the John Doe defendants, including defamation, incitement to violence, impersonation, harassment, and publication of the Plaintiff's stolen and confidential legal documents.
4. The subset of John Doe defendants who have failed to comply with **both** the Identification Order (dated August 16, 2024) and the Removal Order (dated September 17, 2024) includes: **John Doe 1, John Doe 3, John Doe 6, and John Doe 7**. These four individuals are collectively referred to herein as the **Doubly Non-Compliant John Doe Defendants**.
5. The impugned posts contain defamatory statements, incitement to violence, and unlawful publication of stolen legal documents, including the Plaintiff's passport, birth certificate, and confidential materials.
6. On April 29, 2025, during a chambers appearance attended by the Plaintiff and counsel for X Corp., X Corp.'s counsel stated on the record that the John Doe defendants had been notified by X Corp. of the Plaintiff's April 28 and 29



applications. These applications were not served directly on the John Does, as they were directed at X Corp., but X Corp.'s statement supports that the defendants had actual notice of those applications.

7. X Corp.'s counsel further stated — without providing any supporting evidence — that five of the John Doe defendants had responded privately to X Corp. but not to the Court. No explanation was given for their failure to comply with the Orders, file affidavits, or participate in these proceedings.
8. Based on X Corp.'s continued refusal to identify the John Doe defendants or to remove contents that are subject to the Removal Order — while simultaneously acknowledging that it has communicated with all of the John Doe defendants— it appears that X Corp. is effectively shielding those defendants from judicial accountability.

### **Part 3: LEGAL BASIS**

1. The Plaintiff relies on Rule 22-8 of the Supreme Court Civil Rules, which governs applications for contempt of court and the Court's procedural powers in contempt matters.
2. In addition to the Rules, the Court has inherent jurisdiction to ensure that its orders are obeyed, to prevent abuse of process, and to protect the integrity of the administration of justice.
3. The Plaintiff previously sought, and was granted, leave to commence contempt proceedings against the anonymous defendants John Does 1, 3, 6, and 7, who have, on the record, failed to comply with two binding court orders. In light of their anonymity, the Court also authorized substituted service pursuant to the Order of Madam Justice Warren dated June 27, 2024. The Plaintiff now brings this application to hold those defendants in contempt.
4. The Plaintiff relies on the evidence filed in this proceeding, including proof that **John Does 1, 3, 6, and 7** were subject to the Court's **Identification Order**

(August 16, 2024) and Removal Order (September 17, 2024), had actual notice of those orders, and have wilfully failed to comply with either.

5. As stated by the Court of Appeal for British Columbia in *Larkin v. Glase*, 2009 BCCA 321 at paras 7 and 8:

"A court order must be obeyed until and unless it is reversed. Refusal to obey court orders strikes at the heart of the rule of law, at the core of the organization of our society. If court orders can be disregarded with impunity, no one will be safe. ... [Contempt] transcends the dispute between the parties; it is one that strikes at the very heart of the administration of justice."

#### **Part 4: MATERIAL TO BE RELIED ON**

1. Pleadings and material filed herein,
2. Affidavit #20 of Masood Masjoody, dated September 26, 2024.
3. Affidavit #23 of Masood Masjoody, dated April 29, 2025 (body of the affidavit).
4. Order, June 27, 2024.
5. Order, August 16, 2024.
6. Order September 17, 2024.
7. Order, May 9, 2025.
8. Other evidence and material that may be submitted or referred to at the hearing.

TO THE PERSONS RECEIVING THIS NOTICE OF APPLICATION: If you wish to respond to this notice of application, you must, within 5 business days after service of this notice of application or, if this application is brought under Rule 9-7, within 8 business days after service of this notice of application,

- (a) file an application response in Form 33,
- (b) file the original of every affidavit, and of every other document, that
  - i. you intend to refer to at the hearing of this application, and
  - ii. has not already been filed in the proceeding, and
- (c) serve on the applicant 2 copies of the following, and on every other party of record one copy of the following:
  - i. a copy of the filed application response;

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- ii. a copy of each of the filed affidavits and other documents that you intend to refer to at the hearing of this application and that has not already been served on that person;
- iii. if this application is brought under Rule 9-7, any notice that you are required to give under Rule 9-7 (9).

Date: 09/May/2025  
[dd/mm/yyyy]

*Masood Masjoody*

Signature of

☒ Applicant ☐ Lawyer for  
applicant(s)

MASOOD MASJOODY

**To be completed by the court only:**

Order made

- ☐ in the terms requested in paragraphs \_\_\_\_\_ of Part 1 of this notice of application
- ☐ with the following variations and additional terms:

Date: \_\_\_\_\_  
[dd/mm/yyyy]

Signature of ☐ Judge ☐ Associate Judge