

In the matter of SCOTTON & ZACCAGNINO vs. METRÓPOLES COMUNICAÇÃO S.A.,  
GRUPO ESTADO (ESTADÃO), GRUPO FOLHA (FOLHA DE SÃO PAULO), PODER360  
JORNALISMO E COMUNICAÇÃO LTDA  
MOTION FOR EXPEDITED SERVICE PURSUANT TO FED. R. CIV. P. 4(f)(3) AND 4(h)(2)

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
(WEST PALM BEACH DIVISION)**

**ROGERIO SCOTTON,  
PETER ZACCAGNINO (U.S. citizen),  
Owners of Legal Help 4 You LLC,**

**CASE NO:**

**Plaintiff,**

**vs.**

**METRÓPOLES COMUNICAÇÃO S.A.,  
GRUPO ESTADO (ESTADÃO),  
GRUPO FOLHA (FOLHA DE SÃO PAULO),  
PODER360 JORNALISMO E COMUNICAÇÃO LTDA,,  
Defendant.**

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**MOTION FOR EXPEDITED SERVICE PURSUANT TO  
FED. R. CIV. P. 4(f)(3) AND 4(h)(2)**

Plaintiffs Rogerio Scotton and Peter Zaccagnino, appearing pro se, respectfully  
move this Honorable Court to authorize alternative and expedited service of process

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on the foreign Defendants pursuant to Federal Rules of Civil Procedure 4(f)(3) and 4(h)(2).

## **I. LEGAL BASIS**

Rule 4(f)(3) authorizes courts to permit service of process “by other means not prohibited by international agreement,” and Rule 4(h)(2) applies this provision to foreign corporations, partnerships, or associations.

Service under Rule 4(f)(3) does not require exhaustion of other methods and may be authorized at any time, so long as the method is not prohibited by international agreement and is reasonably calculated to provide actual notice. See *Rio Props., Inc. v. Rio Int’l Interlink*, 284 F.3d 1007 (9th Cir. 2002).

## **II. GOOD CAUSE FOR EXPEDITED ALTERNATIVE SERVICE**

Defendants are foreign corporations located in Brazil, a country that is a signatory to the Inter-American Convention on Letters Rogatory, which is not exclusive nor mandatory for foreign service. Moreover:

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The Defendants have actual notice of the allegations and the pending legal matter, as Plaintiffs have already initiated direct communications via email with editorial staff and legal departments;

Plaintiffs have attached copies of emails exchanged with Defendant Estadão's reporter Juliano Galisi, showing knowledge and malicious disregard for factual integrity;

The allegations involve ongoing reputational harm, transnational defamation, and digital misconduct conducted using U.S.-based platforms, which requires timely judicial intervention;

Expedited service is justified by the ongoing harm to the Plaintiffs' reputation, pending U.S. court proceedings, and threats to U.S. institutions and businesses by unregulated foreign disinformation campaigns.

### III. PROPOSED METHOD OF SERVICE

Plaintiffs propose to serve the Defendants by the following means:

Email service to the Defendants' known editorial and legal department emails (listed in the Certificate of Service);

Digital acknowledgment of receipt, to be requested by email;

Certified translated copy (Portuguese) to accompany the original complaint and summons;

Optional follow-up via international courier service (e.g., DHL or FedEx), if required.

These methods are reasonably calculated to give actual notice and are not prohibited by the Inter-American Convention or Brazilian law.

#### IV. CONCLUSION

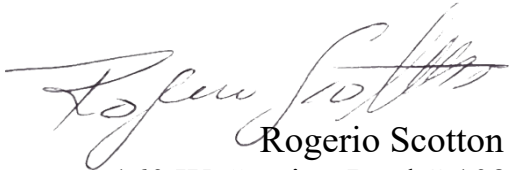
For the reasons stated above, Plaintiffs respectfully request this Honorable Court to:

Authorize service of the summons and complaint on the foreign Defendants pursuant to Fed. R. Civ. P. 4(f)(3) and 4(h)(2);

Approve electronic service via email, as described herein, as an acceptable and valid form of service;

Direct the Clerk to issue summons to be served by Plaintiffs via the approved method;

Grant such further relief as this Court deems just and proper

  
Rogerio Scotton  
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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 9th day of August 2025, a true and correct copy of the foregoing MOTION FOR EXPEDITED SERVICE PURSUANT TO FED. R. CIV. P. 4(f)(3) AND 4(h)(2) was served via electronic mail (email) upon the following Defendants, pursuant to Rule 5(b)(2)(E) of the Federal Rules of Civil Procedure and applicable international notice protocols:

Defendant: Metrôpoles Comunicação S.A.

Address: SCN Quadra 04, Bloco B S/N, Sala 1302 Parte A, Asa Norte, Brasília – DF, CEP 70714-900, Brazil

Email: contato@metropoles.com | redacao@metropoles.com

To the attention of: Natalia Paiva, Editor-in-Chief

Defendant: Grupo Estado (Estadão)

Address: Av. Eng. Caetano Álvares, 55, São Paulo – SP, CEP 02546-000, Brazil

Email: contato@estadao.com | julio.galisi@estadao.com

To the attention of: Juliano Galisi, Reporter

Defendant: Grupo Folha (Folha de São Paulo)

Address: Alameda Barão de Limeira, 425, Campos Elíseos, São Paulo – SP, CEP 01202-900, Brazil

Email: ombudsman@grupofolha.com.br | redacao@grupofolha.com.br

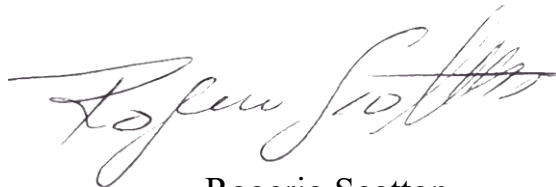
To the attention of: Editorial Department

Defendant: Poder360 Jornalismo e Comunicação Ltda

Address: SHTN Trecho 1, Conj. 1B, Bloco C, sala 103, Brasília – DF, CEP 70701-100, Brazil

Email: redacao@poder360.com.br | contato@poder360.com.br

To the attention of: Editorial and Legal Departments



Rogerio Scotton  
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Boca Raton, FL 33432  
[info@legalthep4y.com](mailto:info@legalthep4y.com)