

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 TO REFER CASE TO ARTICLE III DISTRICT JUDGE

**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.**

**MOTION TO REFER CASE TO ARTICLE III DISTRICT
JUDGE**

COMES NOW, the Plaintiffs, Rogerio Scotton and Peter Zaccagnino, pro se, and pursuant to Rule 73(b)(1) of the Federal Rules of Civil Procedure and Local Rules of the Southern District of Florida, respectfully move this Honorable Court to refer

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the above-captioned matter to an Article III District Judge for all purposes, and in support thereof state the following:

I. PROCEDURAL CONTEXT

Plaintiffs initiated this civil action on August 7, 2025, asserting claims including Defamation Per Se, Civil RICO, Tortious Interference, and Civil Conspiracy, arising out of an international smear campaign targeting Plaintiffs via U.S.-based digital platforms.

Upon case assignment, the docket indicates that a Magistrate Judge may preside over the case or its preliminary phases under administrative procedures of this Court.

II. REQUEST FOR ARTICLE III JURISDICTION

Plaintiffs respectfully exercise their right under 28 U.S.C. § 636(c)(2) and Fed. R. Civ. P. 73(b)(1) to decline consent to jurisdiction by a U.S. Magistrate Judge for the resolution of dispositive motions and trial.

This case raises significant constitutional, statutory, and international law questions, and the Plaintiffs believe the complexity and potential geopolitical implications merit full adjudication before an Article III judge.

III. REASONS SUPPORTING REFERRAL

The claims concern:

Misuse of U.S. digital infrastructure by foreign actors;

Violation of federal civil rights, digital privacy statutes, and defamation laws;

Interference with pending federal litigation (Trump Media v. Moraes, Case No. 9:24-cv-80710);

Allegations of transnational repression and money laundering, now under potential DOJ scrutiny.

Given the transnational nature of the dispute and potential referrals to the Department of Justice and other U.S. agencies, the matters at issue may rise to a level of national interest that warrants Article III judicial oversight.

IV. PRAYER FOR RELIEF

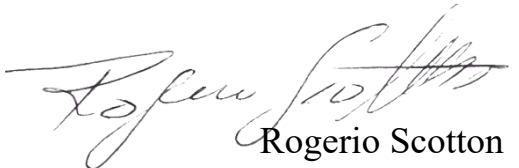
WHEREFORE, Plaintiffs respectfully request that this Court:

Refer this case in its entirety to a U.S. District Judge sitting in the Southern District of Florida, West Palm Beach Division;

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Enter any appropriate Order confirming that all dispositive issues and pretrial motions will be adjudicated by an Article III judge;

Grant such further relief as this Court deems just and proper.


Rogerio Scotton
160 W Camino Real # 102
Boca Raton, FL 33432
info@legalhelp4y.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 9th day of August 2025, a true and correct copy of the foregoing MOTION TO REFER CASE TO ARTICLE III DISTRICT JUDGE 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 | juliano.galisi@estadao.com

To the attention of: Juliano Galisi, Reporter

Defendant: Grupo Folha (Folha de São Paulo)

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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
160 W Camino Real # 102
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