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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT INDIANA
FORT WAYNE DIVISION

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U.S. DISTRICT COURT
NORTHERN DISTRICT INDIANA
F.W. DIVISION
13 CV 0710 RLM

MALIBU MEDIA, LLC,

Plaintiff,

v.

JOHN DOE subscriber assigned IP address
68.57.229.150,

Defendant.

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Civil Action Case No.

**COMPLAINT-ACTION FOR DAMAGES FOR
PROPERTY RIGHTS INFRINGEMENT**

Plaintiff, Malibu Media, LLC, sues Defendant John Doe subscriber assigned IP address
68.57.229.150, and alleges:

Introduction

1. This matter arises under the United States Copyright Act of 1976, as amended, 17
U.S.C. §§ 101 et seq. (the "Copyright Act").

2. Defendant is a persistent online infringer of Plaintiff's copyrights. Indeed,
Defendant's IP address as set forth on Exhibit A was used to illegally distribute each of the
copyrighted movies set forth on Exhibit B.

3. Plaintiff is the registered owner of the copyrights set forth on Exhibit B (the
"Copyrights-in-Suit.")

Jurisdiction And Venue

4. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 (federal question); and 28 U.S.C. § 1338 (patents, copyrights, trademarks and unfair competition).

5. The Defendant's acts of copyright infringement occurred using an Internet Protocol address ("IP address") traced to a physical address located within this District, and therefore this Court has personal jurisdiction over the Defendant because (a) Defendant committed the tortious conduct alleged in this Complaint in this State, and (i) Defendant resides in this State and/or (ii) Defendant has engaged in substantial and not isolated business activity in this State.

6. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) and (c), because: (i) a substantial part of the events or omissions giving rise to the claims occurred in this District; and, (ii) the Defendant resides (and therefore can be found) in this District and resides in this State; additionally, venue is proper in this District pursuant 28 U.S.C. § 1400(a) (venue for copyright cases) because each Defendant or Defendant's agent resides or may be found in this District.

Parties

7. Plaintiff, Malibu Media, LLC, is a limited liability company organized and existing under the laws of the State of California and has its principal place of business located at 409 W. Olympic Blvd., Suite 501, Los Angeles, CA, 90015.

8. Plaintiff only knows Defendant by his, her or its IP Address. Defendant's IP address is set forth on Exhibit A.

9. Defendant's Internet Service Provider can identify the Defendant.

Factual Background

I. *Defendant Used the BitTorrent File Distribution Network To Infringe Plaintiff's Copyrights*

10. The BitTorrent file distribution network (“BitTorrent”) is one of the most common peer-to-peer file sharing venues used for distributing large amounts of data, including, but not limited to, digital movie files.

11. BitTorrent’s popularity stems from the ability of users to directly interact with each other in order to distribute a large file without creating a heavy load on any individual source computer and/or network. The methodology of BitTorrent allows users to interact directly with each other, thus avoiding the need for intermediary host websites which are subject to DMCA take down notices and potential regulatory enforcement actions.

12. In order to distribute a large file, the BitTorrent protocol breaks a file into many small pieces called bits. Users then exchange these small bits amongst each other instead of attempting to distribute a much larger digital file.

13. After the infringer receives all of the bits of a digital media file, the infringer’s BitTorrent client software reassembles the bits so that the file may be opened and utilized.

14. Each bit of a BitTorrent file is assigned a unique cryptographic hash value.

15. The cryptographic hash value of the bit (“bit hash”) acts as that bit’s unique digital fingerprint. Every digital file has one single possible cryptographic hash value correlating to it. The BitTorrent protocol utilizes cryptographic hash values to ensure each bit is properly routed amongst BitTorrent users as they engage in file sharing.

16. The entirety of the digital media file also has a unique cryptographic hash value (“file hash”), which acts as a digital fingerprint identifying the digital media file (e.g. a movie). Once infringers complete downloading all bits which comprise a digital media file, the

BitTorrent software uses the file hash to determine that the file is complete and accurate.

17. Plaintiff's investigator, IPP Limited, established a direct TCP/IP connection with the Defendant's IP address as set forth on Exhibit A.

18. IPP Limited downloaded from Defendant one or more bits of each of the digital movie files identified by the file hashes on Exhibit A.

19. Each of the cryptographic file hashes as set forth on Exhibit A correlates to copyrighted movies owned by Plaintiff as identified on Exhibit B.

20. IPP Limited downloaded from Defendant one or more bits of each file has listed in Exhibit A. IPP Limited further downloaded a full copy of each file hash from the BitTorrent file distribution network and confirmed through independent calculation that the file hash matched what is listed on Exhibit A. IPP Limited then verified that the digital media file correlating to each file hash listed on Exhibit A contained a copy of a movie which is identical (or alternatively, strikingly similar or substantially similar) to the movie associated with that file hash on Exhibit A. At no time did IPP Limited upload Plaintiff's copyrighted content to any other BitTorrent user.

21. IPP Limited downloaded from Defendant one or more bits of each digital media file as identified by its hash value on Exhibit A. The most recent TCP/IP connection between IPP and the Defendant's IP address for each file hash listed on Exhibit A is included within the column labeled Hit Date UTC. UTC refers to Universal Time which is utilized for air traffic control as well as computer forensic purposes.

22. An overview of the Copyrights-in-Suit, including each hit date, date of first publication, registration date, and registration number issued by the United States Copyright Office is set forth on Exhibit B.

23. IPP Limited has also engaged in enhanced surveillance of other digital media files being distributed by Defendant. The results of this more intensive surveillance are outlined in Exhibit C. The Copyrights-in-Suit are solely limited to content owned by Plaintiff as outlined in Exhibit B. Exhibit C is provided for evidentiary purposes only.

24. As the subscriber in control of the IP address being used to distribute Plaintiff's copyrighted movies, Defendant is the most likely infringer. Consequently, Plaintiff hereby alleges Defendant is the infringer. Plaintiff has included as Exhibit D a solicitation of exculpatory evidence in the event that Defendant chooses to deny the allegations.

25. Defendant is the only person who can be identified as the infringer at this time.

Miscellaneous

26. All conditions precedent to bringing this action have occurred or been waived.

27. Plaintiff has retained counsel and is obligated to pay said counsel a reasonable fee for its services.

COUNT I
Direct Infringement Against Defendant

28. The allegations contained in paragraphs 1-27 are hereby re-alleged as if fully set forth herein.

29. Plaintiff is the owner of the Copyrights-in-Suit, as outlined in Exhibit B, each of which covers an original work of authorship.

30. By using BitTorrent, Defendant copied and distributed the constituent elements of each of the original works covered by the Copyrights-in-Suit.

31. Plaintiff did not authorize, permit or consent to Defendant's distribution of its works.

32. As a result of the foregoing, Defendant violated Plaintiff's exclusive right to:

(A) Reproduce the works in copies, in violation of 17 U.S.C. §§ 106(1) and 501;

(B) Redistribute copies of the works to the public by sale or other transfer of ownership, or by rental, lease or lending, in violation of 17 U.S.C. §§ 106(3) and 501;

(C) Perform the copyrighted works, in violation of 17 U.S.C. §§ 106(4) and 501, by showing the works' images in any sequence and/or by making the sounds accompanying the works audible and transmitting said performance of the works, by means of a device or process, to members of the public capable of receiving the display (as set forth in 17 U.S.C. § 101's definitions of "perform" and "publically" perform); and

(D) Display the copyrighted works, in violation of 17 U.S.C. §§ 106(5) and 501, by showing individual images of the works nonsequentially and transmitting said display of the works by means of a device or process to members of the public capable of receiving the display (as set forth in 17 U.S.C. § 101's definition of "publically" display).

33. Defendant's infringements were committed "willfully" within the meaning of 17 U.S.C. § 504(c)(2).

WHEREFORE, Plaintiff respectfully requests that the Court:

(A) Permanently enjoin Defendant and all other persons who are in active concert or participation with Defendant from continuing to infringe Plaintiff's copyrighted works;

(B) Order that Defendant delete and permanently remove the digital media files relating to Plaintiff's works from each of the computers under Defendant's possession, custody or control;

(C) Order that Defendant delete and permanently remove the infringing copies of the works Defendant has on computers under Defendant's possession, custody or control;

(D) Award Plaintiff statutory damages in the amount of \$150,000 per infringed Work pursuant to 17 U.S.C. § 504-(a) and (c);

(E) Award Plaintiff its reasonable attorneys' fees and costs pursuant to 17 U.S.C. § 505; and

(F) Grant Plaintiff any other and further relief this Court deems just and proper.

DEMAND FOR A JURY TRIAL

Plaintiff hereby demands a trial by jury on all issues so triable.

Respectfully submitted,

NICOLETTI & ASSOCIATES, PLLC

By: /s/ Paul J. Nicoletti

Paul J. Nicoletti, Esq. (P44419)
36880 Woodward Ave, Suite 100
Bloomfield Hills, MI 48304

Tel: (248) 203-7800

Fax: (248) 203-7801

E-Fax: (248) 928-7051

Email: paul@nicoletti-associates.com

Attorneys for Plaintiff

File Hashes for IP Address 68.57.229.150

ISP: Comcast Cable

Physical Location: Fort Wayne, IN

Hit Date UTC	File Hash	Title
03/01/2013 01:29:01	1AC23122A8B10AFE4F7CEF1B6746428096E0B9E4	Tuesday Morning
02/22/2013 00:47:17	E08C7D67052512D7D1CF4AC1EC3468E7D9B266BE	Tiffany Teenagers in Love
02/19/2013 03:26:26	7E1C2F79E25F5A28C749991023A5ABD74D73C24E	Apartment in Madrid
11/28/2012 17:00:18	A2C51A61409258952A469C9C1DF8C197CC5C85AE	Threes Company
11/28/2012 16:35:56	4706491E8D3A2D21A3BCCC444F08E25E3D93B926	Fucking Perfection
11/28/2012 09:21:20	8342201A3C44277E7753BBCB2EFDA014EBEF84A4	Backstage
11/28/2012 06:47:02	9830D15B5D1BC23579ABD22B39A2BF5E6C941628	Photo Fantasy
05/15/2012 17:48:14	77A45D676CEF28F3EA2E9ACB4C602CADC6BBAA69	Introducing Diana

Total Statutory Claims Against Defendant: 8

EXHIBIT A

Copyrights-In-Suit for IP Address 68.57.229.150

ISP: Comcast Cable

Location: Fort Wayne, IN

Title	Registration Number	Date of First Publication	Registration Date	Most Recent Hit UTC
Apartment in Madrid	PA0001826992	02/16/2013	02/18/2013	02/19/2013
Backstage	PA0001797943	07/17/2012	07/18/2012	11/28/2012
Fucking Perfection	PA0001789507	06/24/2011	05/11/2012	11/28/2012
Introducing Diana	PA0001789511	05/11/2012	05/11/2012	05/15/2012
Photo Fantasy	PA0001808631	09/28/2012	09/28/2012	11/28/2012
Threes Company	PA0001804939	08/17/2012	08/15/2012	11/28/2012
Tiffany Teenagers in Love	PA0001762019	12/29/2010	11/20/2011	02/22/2013
Tuesday Morning	PENDING	02/26/2013	02/28/2013	03/01/2013

Total Malibu Media, LLC Copyrights Infringed: 8

EXHIBIT B

NIN20

Expanded Surveillance of IP Address 68.57.229.150**ISP:** Comcast Cable**Location:** Fort Wayne, IN

Hit Date UTC	Filename
03/07/2013	x - art - Caprice (Fucking Perfection) 720bb.wmv
03/06/2013	Jordan-Night - VOM SOLDATEN OUTDOOR MIES GEBUMST.wmv
03/06/2013	NubileFilms - Blonde Massage Grace Hartley, Marry Queen [720p].wmv
03/06/2013	WoodmanCastingX - Hard bed - Alice Romain.mp4
03/06/2013	Blue.Angel.Sophie.Lynx.Two.Girl.Fellatio.Party.OnlyBlowJob.2013.HD_ityutero.com.mp4
03/06/2013	CumLouder - TiTs The End of the World - Mar Duran.mp4
03/06/2013	zl11403_1500.mp4
03/06/2013	tits-the-end-of-the-world-sd.MP4
03/06/2013	Nekane.Nekane.wants.your.cum.GiveMeSpunk.2013_ityutero.com.mp4
03/06/2013	spooporn-susi-gala-cum-forrest-cum-sd.mp4
03/06/2013	slut-test-sd.mp4
03/06/2013	Mar.Duran.Superfacial.Girl.GiveMeSpunk.2013_ityutero.com.mp4
03/06/2013	Mar_Duran_in_my_room_3.mp4
03/06/2013	Trike Patrol - Lupe And Susi
03/05/2013	AssHoleFever - Christmas Spirit - Shalina Divine.mp4
03/05/2013	Babes - Abigail Mac Pleasure Dawn 2013 XXX 720p WEB-DL AVC AAC VIP
03/05/2013	Ita_eva_cole.-.368p_750.mp4
03/05/2013	09.09.02.Allie Jordan_Stephanie Cane_AllGirlMassage_ImgZilla.mp4
03/05/2013	IKnowThatGirl Fucking in Every Room in the House Rikki Six
03/05/2013	Private - Schoolgirl Alice Romain Gets A Lesson In Anal Sex She Will Never Forget [720p].mp4
03/05/2013	Rikki Six, Tasha Reign Girl - Girl

EXHIBIT C

NIN20

Hit Date UTC	Filename
03/05/2013	ftnaevajordan_qt.mp4
03/05/2013	MyDirtyHobby Barbie Brilliant und Jordan Night
03/05/2013	Rikki.Six.This.Is.How.Porn.Stars.Suck.Dick.BlowJobFridays.2013.HD_iyutero.com.mp4
03/05/2013	Rikki Six - Sexy Rocker Chick Gets A Mouth Full to Swallow.mp4
03/05/2013	NaughtyAmerica- Rikki Six (25.01.2013) (2013) SATRip
03/05/2013	prnfile1456x.wmv
03/05/2013	BlowJobFridays - Rikki Six ** 2 March 2013 ** HD 720.mp4
03/04/2013	noromialan_qt.mp4
03/04/2013	Lesbian Girl On Girl - Abigail Mac and Romi Rain HD 720p
03/04/2013	rws_vanilla_devile_480p_1000.mp4
03/04/2013	Ass Worship 14 - AJ Applegate.mp4
03/04/2013	Shes A Freak - Abigail Mac
03/01/2013	Californication.S06E07.HDTV.x264-2HD.mp4
03/01/2013	rws_asa_madison_480p_1000.mp4
03/01/2013	NaughtyAmerica-Raven Bay
02/22/2013	Amateur Multiple Orgasms - Tiffany Thompson.wmv
02/22/2013	Tiffany.Thompson.Super.Pretty.In.White.Twistys.2013.HD_iyutero.com.mp4
02/22/2013	Food Presenting Secrets PDF (1).pdf
02/22/2013	Looper 2012 TS READNFO XviD.RoSubbed-GodFront
02/22/2013	Babes - Majestic Elegance - Tiffany Thompson [1080p].mp4
02/21/2013	11.04.01.Amia Miley_18YearsOld_ImgZilla.mp4
02/21/2013	Anal Size My Wife 3 - Angelina Valentine HD 720p
02/21/2013	Amazing.Asses.4.XXX.DVDRip.x264-UPPERCUT
02/21/2013	Daruvu (2012) Telugu Movie BDRip XviD 1CD Rip www.RipsTracker.com
02/21/2013	Amia Miley from Keeping it up for the KardASSians.avi

EXHIBIT C

NIN20

Hit Date UTC	Filename
02/21/2013	Lexi Diamond_Fuck The Babysitter.avi
02/21/2013	amia_brcc.MPG
02/21/2013	Amia.Miley.Pound.Pussy.2.Scene.1.EvilAngel.2012_ityutero.com.mp4
02/21/2013	10.09.14.Lexi_Eve_TeenBFF_ImgZilla.mp4
02/19/2013	plib_jenni_lee02_480p_1000.mp4
02/19/2013	nubilefilms_the_perfect_touch_1280.mp4
02/19/2013	prnfile1646x
02/19/2013	Young and Glamorous 4 - Presley Hart.m4v
02/19/2013	Californication.S06E06.HDTV.x264-EVOLVE.mp4
02/19/2013	18InchesOfPain Hillary Scott and Leah Luv Stretched To Their Limits.avi
02/19/2013	MyFriendsHotMom - Raylene ** HOT ** 10 February 2013** - KTR.mp4
02/19/2013	DJ_Bullbazz.rar
02/19/2013	TonightsGirlfriend_Christy_Mack_1500.mp4
02/19/2013	StreetRanger Jenni Lee.wmv
02/19/2013	Jenni.Lee.Suck.For.My.Silence.RealWifeStories.2012_ityutero.com.mp4
02/19/2013	babes_bg_presley_hart_480p_1500.mp4
02/19/2013	mdhgjennibruce2_qt.mp4
02/19/2013	Californication.S06E04.HDTV.x264-2HD.mp4
02/19/2013	x-art_kaylee_apartment_in_madrid_540-chkm8te.mp4
02/09/2013	Spartacus.S03E02.HDTV.x264-EVOLVE.mp4
02/05/2013	Dark Haired Beauties - Gia Dimarco.mp4
02/05/2013	Wreck.It.Ralph.2012.DVDSCR.XViD.AC3-LEGiON
02/05/2013	GFRevenge - Pussy Prepping - Rahyndee.flv
02/05/2013	The Similou - So Hot Right Now (2005).rar
02/05/2013	Season One

EXHIBIT C

NIN20

Hit Date UTC	Filename
02/05/2013	prnfile1430x.mp4
02/05/2013	NaughtyOffice - Brandy Aniston ** SD ** 13 JANUARY 2013.mp4
02/05/2013	Brandy Aniston from My Haunted House
02/05/2013	duck dynasty S2
02/01/2013	JaydenJaymes.12.08.31.Jayden.Jaymes.And.Brandy.Aniston.Brunette.Attack.REPACK.XXX.HR.WMV-YAPG
02/01/2013	da_brandy_aniston_480p_1000.mp4
01/24/2013	Django Unchained 2012 DVDSCR X264 AAC-P2P
01/20/2013	27178_Lorelei Lee_Proxy Paige_Penny Pax.wmv
01/20/2013	Krissie Dee - Krissie Won.wmv
01/20/2013	Prison Bad Girls 4 Picture Book - Allie Haze, Katie Jordin-SmR.mp4
01/20/2013	Veronica.Avluv.Phoenix.Marie.Krissy.Lynn.Eva.Karera.Raw.13.Scene.5.EvilAngel.2013.HD_ityutero.com.mp4
01/20/2013	prnfile624x.wmv
01/20/2013	Lawless (2012).BDRip.HQQuality.LeQ
01/20/2013	Big Tits At Work - CHANEL PRESTON, KRISSY LYNN, NICOLE ANISTON and TANYA TATE New 27 December 2012
01/20/2013	mwhfkrissymark_qt.mp4
01/20/2013	FB-0406 Derrick Pierce and Nika Noire
01/20/2013	btaw_krissy_lynn02_480p_1000.mp4
01/20/2013	v22374 - Krissy Lynn.mp4
01/20/2013	Krissy Lynn - Internal Damnation 5.m4v
01/20/2013	Teen Monster Cock Worship - Proxy Paige.avi
01/19/2013	btis_daisy_cruz_480p_1000.mp4
01/18/2013	ladshaneaaron_qt.mp4
01/18/2013	Leche69 Valerie Kay 720p.mp4

EXHIBIT C

NIN20

Hit Date UTC	Filename
01/18/2013	Teenage Delinquents - Kim Kennedy
01/18/2013	12.11.24.Diamond Kitty_Chongas_ImgZilla.mp4
01/18/2013	1way2sex.net...18 J.Alex vögelt unerfahrene Freundin.rar
01/18/2013	Pantyhose Tease - Melanie Jane
01/18/2013	Valerie.Kay.Oiled.Bubble.Ass.LatinaSexTapes.2012_ityutero.com.mp4
01/15/2013	btag_tiffany_tyler_480p_1000.mp4
01/15/2013	My Sisters Hot Friend - Molly Bennett HD 720p
01/14/2013	Blue Angel, Linet Slag (Anal Uniforms Pantyhose) (2013)
01/14/2013	Culioneros - Valentina Nappi.mp4
01/14/2013	zj11088_3000.mp4
01/14/2013	Valentina Nappi - Hot Brunette With An Incredible Body
01/08/2013	Goddess-Sunny Leone.avi
01/08/2013	mrbigdickshotchicks.com - Tiffany Price.wmv
01/08/2013	prnfile738x
01/08/2013	Sunny.Leone.Ecstatic.Orgasm.Babes.2012.HD_ityutero.com.mp4
01/08/2013	Danni.Angela.Sommers.and.Nicole.Graves.Sexy.Cheerleading.Tryouts.XXX.pornalized.wmv
01/07/2013	Good Girl Gone Bad (Reloaded)
01/07/2013	This Is 40 2012 DVD Screener Xvid UnKnOwN
12/30/2012	Deep Purple-Machine Head VideoT_S
12/30/2012	Tori_Black_II_-_Intimate_Passions
12/30/2012	Tori Black - All Access Backstage Pass
12/30/2012	Innocent High - Gracie Glam.wmv
12/30/2012	Killing.Them.Softly.2012.DVDRip.XviD.AC3-nLiBRA
12/26/2012	Mason Moore And Presley Maddox - Hard Time
12/25/2012	House.At.The.End.Of.The.Street.2012.O.HDRip.1400MB-TST.avi

EXHIBIT C

NIN20

Hit Date UTC	Filename
12/25/2012	For.a.Good.Time.Call.2012.UNRATED.DVDRip.XviD-PLAYNOW.avi
12/25/2012	Can He Score - Mia Lelani HD 720p
12/25/2012	Flight.2012.DVDSCR.XviD-HELLRAZOR
12/25/2012	Kill.Em.All.2013.DVDRip.XviD.AC3-PTpOWeR
12/25/2012	Can He Score - Delta White HD 720p
12/25/2012	Up Her Asshole- Mason Moore.avi
12/21/2012	Petite Coeds-Jessica Lynn.avi
12/21/2012	10.07.08.Jessica Lynn_MassageCreep_ImgZilla.mp4
12/21/2012	prnfile479x.avi
12/21/2012	Dredd.2012.CROPPED.HDRIP.XviD-NYDIC
12/15/2012	Nikita.S03E05.HDTV.x264-LOL.[VTV].mp4
12/09/2012	Nikita.Season.1-2.Complete.480p.ILPruny
12/09/2012	Warehouse 13 seaon 1
12/09/2012	Hope Springs (2012)
12/09/2012	Alex.Cross.2012.BRRIP.XVID.AC3-SPIRO
12/08/2012	RealityGang.12.08.25.Lexi.Kartel.XXX.720p.WMV-VSEX[rbg]
12/08/2012	bj10921_1500.mp4
12/08/2012	iktg_bailey_brittney-sd169.wmv
12/07/2012	Madison_Ivy_and_Bailey_Blue_-_Forever_Love_Trust
12/07/2012	plib_katie_st_ives_480p_1000.mp4
12/07/2012	Holly Taylor - Car Trouble
12/07/2012	FM-24669 Holly Taylor
12/07/2012	pwg10986_800.mp4
12/07/2012	Tiffany Fox - Closet Voyeur HD720p (reshi5531)
12/06/2012	Culioneros - Better Then Ever! - Richelle Ryan [480] [mp4]

EXHIBIT C

NIN20

Hit Date UTC	Filename
12/06/2012	Virgin Runaways - Mandy Armani.avi
12/06/2012	sharing_asa_and_lexi.mp4
12/06/2012	MyFriendsHotGirl Aria Austin
12/06/2012	BangBros- Richelle Ryan, Mercedes Lynn, Jessica Rayne (Girls lick pussy better than guys 15.11.12) (2012) SATRip
12/06/2012	PartyOfThree-MercedesLynnMacyCartelandAaliyahLovePussyEaters-121129.mp4
12/06/2012	Busty Beauties Car Wash - Holly Taylor.avi
12/06/2012	pos10550_800.mp4
12/06/2012	Atk Galleria - Macy Cartel Fingering Funtime HD 1080p
12/05/2012	Jessa Rhodes - College Girls Like It Dirty.m4v
12/05/2012	Jessa Rhodes - Bathtime Pussy Play
12/05/2012	c9843_854x480.mp4
12/05/2012	Jessa Rhodes, Tyler Nixon_1080.mp4
12/05/2012	aria_austin_01.wmv
12/05/2012	Naomi West - College Girls Like It Dirty (2012)
12/05/2012	Sons.of.Anarchy.S05E13.HDTV.x264-ASAP.mp4
12/04/2012	Gina Lynn-Oil Overload
12/04/2012	X-Art - Girlfriends Back - Gigi Rivera [1080p].mov
12/04/2012	SexProAdventures - Sativa Rose
12/04/2012	btaw_brooke_banner-sd169.wmv
12/03/2012	HighDefBlowJobs Sativa Rose.wmv
12/02/2012	451_beverly_paige_full-hd_480p.mp4
12/02/2012	btis_kiera_king_480p_1000.mp4
12/02/2012	mshfmaddygiovanni_qt.mp4
12/02/2012	eva_notty_nikita_black_couch.mp4

EXHIBIT C

NIN20

Hit Date UTC	Filename
12/02/2012	Teens_Like_It_Big_-_Kelly_Surfer_Veruca_James
12/02/2012	461_natasha_vega_full-hd_360p.mp4
12/02/2012	mfhmevadanny_qt.mp4
12/02/2012	My Friends Hot Mom - Nikita Von James HD 720p
12/02/2012	NaughtyAmerica-Nikita Von James (23.11.2012) (2012) HDTV
12/02/2012	bgb_kiera_king_480p_1000.mp4
12/02/2012	natasha_vega_01.wmv
12/02/2012	Milf Soup - Nikita Jaymes
12/02/2012	464_veruca_james_full-hd_360p.mp4
12/02/2012	PornFidelity_-_Beverly_Paige
12/02/2012	TeensLikeItBig - Maddy Oreilly ** NEW 2 october 2012 ** SD MP4.mp4
11/30/2012	AdultSupervisionRequired - Emma Mae.wmv
11/29/2012	RealExGirlfriends - One Last Fuck - Ella Milano [720p].wmv
11/29/2012	LatinAdultery - Ella Milano.mp4
11/29/2012	Hot_And_Mean_-_JELENA_JENSEN__RYAN_KEELY
11/29/2012	Kinzie.Kenner_Hard.Candy.2_2006.HDRip.mp4
11/29/2012	Paranorman.2012.HDRip.XviD-PTpOWeR
11/29/2012	NaughtyOffice - Roxy Deville.wmv
11/29/2012	McAfeeSetup.exe
11/29/2012	WeLiveTogether - Good Love - Malena Morgan, Georgia Jones.mp4
11/29/2012	Pump My Ass Full Of Cum - Kinzie Kenner
11/29/2012	Foot Fetish Daily - Sammie Rhodes Hardcore With Roxy Deville
11/29/2012	bitreactor.to_White.Collar.Hooligan.rar
11/29/2012	DeepThroatLove - Nadia Styles
11/29/2012	sweet_seductress_big.mp4

EXHIBIT C

NIN20

Hit Date UTC	Filename
11/28/2012	Killergram - Sexy Office Adventures - Caprice Jane [720p].mp4
11/28/2012	Wife.Switch.17.XXX.DVDRiP.x264-DivXfacTory
11/28/2012	Maya Hills and Amy Ried from Pillows of Love.avi
11/28/2012	all-in-my-mouth.mp4
11/28/2012	PureCFNM.Cheer.Up.Fuck.XXX.WMV-hUSHhUSH.wmv
11/28/2012	x-art_maya_backstage_720.mov
11/28/2012	X-Art - Photo Fantasy - Maya [1080p].mov
11/28/2012	A Day In The Life Of Danny D-Angel Rivas.avi
11/28/2012	mwhfmayaanthony_2k.wmv
11/28/2012	Gabriella.nneli.Veronika.Samantha.Girls.Night.Out.X.Art.2011_ityutero.com.flv
11/28/2012	Lilu's Handjobs - Maya's Handjobs HD 720p
11/28/2012	X-Art - Miss Perfect - Anneli [720p].mov
11/28/2012	Anal Size My Wife 3-Maya Hills.avi
11/28/2012	Anneli.lvy.The.Masseuse.X.Art.2011.FullHD_ityutero.com.mov
11/28/2012	Evil Anal 8 - Maya Hills
11/28/2012	Zzaph.exe
11/28/2012	Race of Champions.2004.Speed Channel-GP2X.taromaru.avi
11/28/2012	SYGF_Maya_04_08_2012.mp4
11/28/2012	Wife Switch vol. 17 (2012) [DvdRip].mp4
11/27/2012	mwhflexiimick_qt.mp4
11/27/2012	ATKPetites.com_12.08.04.Cindy.Starfall.Toys
11/27/2012	Mia Rider (Daddy Knows Best 2, Scene 4) (2012) HD 1080p
11/27/2012	EB-25837 Kelly Divine and Mia Rider
11/27/2012	Babes - Little Romance - Cindy Starfall [720p].mp4
11/27/2012	btra10847_800-chkm8te.mp4

EXHIBIT C

NIN20

Hit Date UTC	Filename
11/27/2012	MyDadsHotGirlfriend - Micah Moore.wmv
11/27/2012	12.11.12.Rikki Six_Nikita Von James_MomsBangTeens_ImgZilla.mp4
11/27/2012	House Wife 1 On 1 - Mckenzee Miles HD 720p
11/27/2012	InnocentHigh - Big Red - Melody Jordan [720p].mp4
11/27/2012	Legs - Rikki Six.avi
11/26/2012	12.11.15.Melody Jordan_PervsOnPatrol_ImgZilla.wmv
11/26/2012	NextDoorAmateur.com - Jennifer White
11/26/2012	Anissa_750.mp4
11/26/2012	prnfile604x.mp4
11/26/2012	The Dog Whisperer s01e15 Scrawny and Lola.avi
11/26/2012	cs.melody.jordan.mp4
11/26/2012	mshfjessierikkijordan_qt.mp4
11/26/2012	Asian Fuck Faces 2 - Cindy Starfall HD 720p
11/26/2012	c9785_854x480.mp4
11/26/2012	c9664_854x480.mp4
11/26/2012	Babysitter Diaries 4 - Jennifer White.avi
11/22/2012	College SugarBabes - Alyssa Branch [1080p].mp4

EXHIBIT C

NIN20

EXCULPATORY EVIDENCE REQUEST

Subscriber Name:

Subscriber Address:

Attorney Name/Contact:

1. List all authorized users (including household members) of any IP Address assigned to the Defendant.

Authorized User Name/Relationship

A. _____

- Adult Child
- Domestic Partner
- Minor Child
- Roommate
- Spouse
- Tenant
- Unrelated adult

B. _____

- Adult Child
- Domestic Partner
- Minor Child
- Roommate
- Spouse
- Tenant
- Unrelated adult

C. _____

- Adult Child
- Domestic Partner
- Minor Child
- Roommate
- Spouse
- Tenant
- Unrelated adult

EXHIBIT D

NIN20

D. _____

- Adult Child
- Domestic Partner
- Minor Child
- Roommate
- Spouse
- Tenant
- Unrelated adult

2. Has a WI-FI enabled device been used to effectuate a connection to an IP Address assigned to the Defendant?

YES NO

3. If #2 is yes, please provide make, model and serial number of all such WI-FI modems and/or routers:

4. Has a Bittorrent Client been installed on any electronic device used by the Defendant and/or other Authorized Users used to access the Internet via an IP Address assigned to the Defendant?

YES NO

5. What is the distance from the Defendant's residence to the closest neighbor?

_____ Yards.

EXHIBIT D

NIN20

6. Has the Defendant and/or Authorized Users as listed in #1 above ever legally purchased Plaintiff's material or visited their website?

YES NO

7. Has the Defendant and/or Authorized Users as listed in #1 above ever visited any website containing Torrent Magnet Links?

YES NO

8. Has the Defendant and/or Authorized Users as listed in #1 above ever used Google, Bing, Yahoo or any other Internet Search Engine to search for information on Torrent files and/or websites?

YES NO

9. Has the Defendant and/or Authorized Users as listed in #1 above ever visited a streaming media site containing unauthorized copies of Plaintiff's works?

YES NO

10. Has the Defendant and/or any Authorized User as listed in #1 received a notice of copyright infringement from their Internet Service Provider, from the Center for Copyright Information, or from any other private intellectual property owner?

YES NO

Signed

Date

EXHIBIT D

NIN20