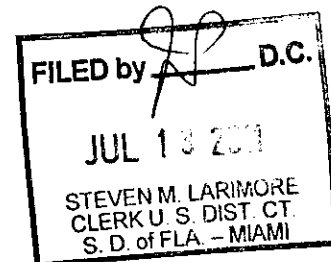


**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**



Patrick Collins Inc.

Civil Action: 0:11cv60568cmA

Plaintiff

v.

John Doe one through six

Lipcomb Eisenberg, PL

John Doe IP: 66.229.77.84

Attorney for Plaintiff

Pro Se

2 South Biscayne Blvd.

(954) 609-8572

Penthouse 3800

Miami, FL 33131

MOTION TO QUASH SUBPEONA

Defendant, John Doe, through prose Files this motion to Quash a subpoena issued by this court in the in the above-captioned litigation. In support of his motion, Defendant states as follows:

1. This is an action to quash a subpoena issued by Plaintiff, Patrick Collins, Inc. for the disclosure of the name, identity, and location of individuals who are alleged to have posted false, misleading and disparaging information on various internet chat rooms and form sites.
2. The subpoena was served on Comcast cablevision ("Comcast") in Morristown, New Jersey on June 17, 2011.
3. Doe Defendant is requesting this Honorable Court to quash said subpoena or, in the alternative, issue a protective order prohibiting Comcast from revealing the name, identity of, or location of the individual using the Internet Protocol Address 66.229.77.84 on the dates specified on Exhibit A of the subpoena.

4. In support of its position Defendant states the (1) Plaintiff has failed to show that its need for the information requested outweighs the Anonymous speakers First Amendment rights; (2) the constitutional protections of Freedom of Association outweighs the Plaintiff need to be granted access to the name, identity, and location of Doe Defendant; (3) Plaintiff has failed to establish in its pleadings that it has a legitimate good-faith basis that it may be a victim of conduct actionable in this jurisdiction against Doe Defendant; and (4) Plaintiff has failed to establish that the identity of Doe Defendant is centrally needed to advance their claims.

WHEREFORE, for the reasons set forth above Defendant John Doe respectfully requests this Honorable Court to quash the subpoena or, in the alternative, to issue a protective order preventing Comcast from divulging the name, identity, location or other personal information of Defendant John Doe.

John Doe IP: 66.229.77.84

Pro Se

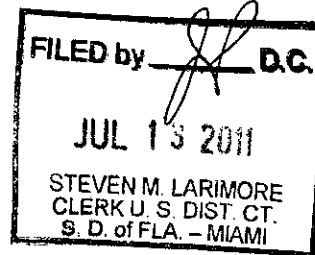
(954) 609-8572

Date: July 12, 2011

**United States District Courts
Southern District of Florida**

Patrick Collins Inc.
Plaintiff

Civil Action: 0:11cv60568cmA



v.

John Doe one through six

Lipcomb Eisenberg, PL

John Doe IP: 66.229.77.84

Attorney for Plaintiff

Pro Se

2 South Biscayne Blvd.

(954) 609-8572

Penthouse 3800

Miami, FL 33131

PROOF OF SERVICE

STATE OF FLORIDA)

) SS.

COUNTY OF BROWARD)

John Doe IP: 66.229.77.84 being first duly sworn, deposes and say that on July 12, 2011 he served via U.S. Mail a copy of Defendant Motion to Quash subpoena along with a copy of this Proof of Service on Plaintiff Counsel at the following address 2 South Biscayne Blvd. Penthouse 3800, Miami, FL 33131

John Doe IP: 66.229.77.84

Pro Se

(954) 609-8572

6218 Duval Dr
Margate, FL 33063

MIAMI FL 331
12 JUL 2011 PM 2 L



United States District Court
Southern District of Florida
400 North Miami Ave
Miami, FL 33128

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