

Petition to Quash
of

John Doe Number 19

In the Matter of
Patrick Collins, Inc. v. Does 1-39

United States District Court for the District of Maryland

Docket Number 8:12-cv-00093

Civil Action Number DKC 12-0093
Order Entered: January 13, 2012
Comcast File Number 347829

Whereas, I have been identified as John Doe Number 19 in the captioned Docket Number, having IP Address Number 76.21.167.57 associated with my residence in Maryland according to Comcast, my Internet Service Provider (ISP) and,

Whereas, aside from the representations of my ISP, I have no proof that the IP Address Number noted above is or was in fact associated with my residence and,

Whereas, the Plaintiff has stated that I have allegedly committed copy right infringement by illegally obtaining a pornographic movie that is being illegally distributed over the Internet by peer-to-peer file sharing technology and,

Whereas, I did not commit the alleged copy right infringement as stated by the Plaintiff nor have I or any member of my household ever illegally obtained any information via the Internet and,

Whereas, my household, consist of two adults and one minor child and is located in a townhouse subdivision and,

Whereas, the Plaintiff has stated that this incident occurred on Tuesday, December 6, 2011, at 5:59 a.m. GMT which equates to Tuesday, December 6, 2011, at 12:59 a.m. EST and,

Whereas, my household does not utilize password protection in order to access my Internet Account provided by my ISP and,

Whereas, my Internet Account can be accessed remotely using wireless technology and,

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DISTRICT OF MARYLAND
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**United States District Court for the District of Maryland,
Docket Number 8:12-cv-00093
Page 2**

Whereas, my residence is located in a densely populated subdivision that by its nature provides numerous opportunities for neighbors, visitors, or even individuals passing in cars can obtain access to my Internet Account using wireless technology and,

Whereas, it would be an enormous undue burden for me if John Doe Number 19 is forced to respond to these allegations and defend myself in a court of law;

**John Doe Number 19 respectfully submits this Petition to Quash the
Plaintiffs Subpoena as it allegedly relates to IP Address Number
76.21.167.57.**

In support of this Petition to Quash, John Doe Number 19 indicates that:

I am representing myself in this matter at this time and I am not an Attorney and,

In order for me to protect my interests if this matter proceeds in the United States District Court for the District of Maryland, I would have to hire an Attorney with a minimum of a \$1000.00 dollar retainer, and the legal costs increase significantly if this case were to proceed to discovery and trial. This outcome would create an enormous financial burden for me and my family and,

I would have to miss days from work that would force me to take time off without pay or utilize my vacation time to attend court, meetings with my Attorney and address all other matters that may arise in the context of this proceeding. This outcome would pose a significant financial burden for me and my family and,

My spouse would also have to miss days from work that would force her to take time off without pay or utilize her vacation time to attend court, meetings with our Attorney, and address all other matters that may arise in the context of this proceeding. This outcome would pose a significant burden for me and my family and,

I would have to secure day care for my minor child while tending to the matters that may arise in the context of this proceeding at great expense and,

If discovery is required, there will be significant time and expense associated with obtaining the requested information and responding to these false allegations which would pose a significant burden for me and my family and,

I did not receive proper service/notification of this pending proceeding as a copy of the Subpoena was delivered via UPS to my home and left on my doorstep on Monday, February 13, 2012, which provided less than 30 days for me to respond to this Subpoena and file this Petition to Quash.

**United States District Court for the District of Maryland,
Docket Number 8:12-cv-00093
Page 3**

For these reasons:

John Doe Number 19 respectfully requests that the United States District Court for the District of Maryland grant this Petition to Quash the Subpoena that is the subject of this captioned docket.

Respectfully Submitted by

A handwritten signature in black ink that reads "John Doe NO. 19". The signature is written in a cursive style with a vertical line through the letter 'J'.

John Doe Number 19

IP Address Number 76.21.167.57

Filed: Friday March 9, 2012
United States District Court for the District of Maryland
6500 Cherrywood Lane
Greenbelt, Maryland 20770