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8 Attorney for Plaintiff  
 9 IO GROUP, INC.

10 **UNITED STATES DISTRICT COURT**  
 11 **NORTHERN DISTRICT OF CALIFORNIA**  
 12 **SAN JOSE DIVISION**

11		)	
12	IO GROUP, INC., a California corporation,	)	<b>CASE NO. C-06-3926 (HRL)</b>
13	Plaintiff,	)	<b>DECLARATION OF KEITH RUOFF IN</b>
14		)	<b>SUPPORT OF PLAINTIFF'S MOTION</b>
15	vs.	)	<b>FOR ADMINISTRATIVE RELIEF IN</b>
16	VEOH NETWORKS, Inc., a California	)	<b>THE FORM OF AN ORDER TO FILE</b>
17	Corporation,	)	<b>DOCUMENTS UNDER SEAL</b>
18	Defendant.	)	
19		)	

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 21 I, KEITH RUOFF, declare:

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 24 1. I am Vice President of Plaintiff, Io Group, Inc. that operates under the trade name of  
 25 Titan Media and Titan Men.

26 2. In this matter, Plaintiff produced to Defendant the following documents, all of which I  
 27 have viewed:

28 a. 200275 - a DVD containing Plaintiff's copyrighted work *Boner*

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- b. 200276 - a DVD containing Plaintiff's copyrighted work *Don't Ask Don't Tell*
- c. 200277 - a DVD containing Plaintiff's copyrighted work *Heat*
- d. 200278 - a DVD containing Plaintiff's copyrighted work *Island Guardian*
- e. 200279 - a DVD containing Plaintiff's copyrighted work *Sea Men*
- f. 200280 - a DVD containing Plaintiff's copyrighted work *Detour*
- g. 200281 - a DVD containing Plaintiff's copyrighted work *River Patrol*
- h. 200282- a DVD containing files I downloaded from [www.Veoh.com](http://www.Veoh.com), which contain portions of *Boner, Don't Ask Don't Tell, Heat, Island Guardian, Sea Men, Detour, and River Patrol*
- i. 200953 - a DVD containing video files that had previously been available on [www.veoh.com](http://www.veoh.com). Defendant's produced these video files in response to Plaintiff's discovery requests with a confidential classification under the parties Stipulated Protective Order. The files contain portions of Plaintiff's registered works *Carny, Laid Up, and First Crush*.
- j. 200954 - a DVD containing Plaintiff's copyrighted work *Carny*
- k. 200955 - a DVD containing Plaintiff's copyrighted work *Laid Up*
- l. 200956 - a DVD containing Plaintiff's copyrighted work *First Crush*

3. Each of the above documents contains sexually explicit material that is not appropriate for minors or individuals not wishing to be inadvertently exposed to it.

Pursuant to the laws of the United States, I declare under penalty of perjury the foregoing is true and correct.

Dated: August 20, 2007

/s/ Keith Ruoff  
Keith Ruoff

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I hereby attest that this is the declaration of Keith Ruoff and the original with Keith Ruoff's holographic signature is on file for production for the Court if so ordered, or for inspection upon request by any party. Pursuant to the laws of the United States, I declare under penalty of perjury the foregoing is true and correct.

Dated: *August 20, 2007*

/s/ Gill Sperlein  
GILL SPERLEIN,  
Counsel for Plaintiff Io Group, Inc.