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6 Attorney for Plaintiff,
LIBERTY MEDIA HOLDINGS, LLC

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8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA

10	LIBERTY MEDIA HOLDINGS, LLC d/b/a)	Case No. 10-CV-1810-JLS-WMC
11	CORBIN FISHER)	DECLARATION OF MARC RANDAZZA IN SUPPORT OF MOTION TO SUBSTITUTE NAME OF COREY DEBARROS FOR "COREY"
12	Plaintiff,)	
13	vs.)	
14	PORNILOVE.NET, "COREY," and JOHN)	
15	DOES 3-1000)	
16	Defendants)	

17 I, Marc Randazza, declare under penalty of perjury as follows:

- 18 1. I am the attorney for Plaintiff Liberty Media Holdings and the following is based upon
19 personal knowledge.
- 20 2. On or about August 31, 2010, I issued a subpoena to Google requesting information,
21 including IP addresses used by the administrator to create and access the accounts of certain
22 Pornilove blogs operated on the Google blog platform Blogger. Google responded with 2 IP
23 addresses, including 98.254.227.216.
- 24 3. On or about November 22, 2010, I issued a subpoena to Yahoo! Requesting relevant
25 information pertaining to the Pornilove Yahoo! Group, including IP addresses used by the
26 administrator to create and access the accounts. Yahoo! Responded with 4 IP addresses,
27 including 98.254.227.216 (the same IP address received from Google), and 98.203.91.156.
- 28 4. Each of these IP addresses was registered to the Internet Service Provider, Comcast
Cable.

1 5. On January 6, 2011, I filed a Motion seeking leave of the court to issue discovery to
2 Comcast requesting the identity of the subscriber of these IP addresses on the relevant dates and
3 times. ECF No. 11.

4 6. The Court granted this Motion on January 19, 2011 (ECF No. 12), and on or about
5 January 21, 2011, I issued a subpoena to Comcast with the Court Order requesting the
6 subscriber's identity.

7 7. On February 22, 2011, the Plaintiff received Comcast's response, which identified Corey
8 Debarros as the subscriber of the relevant IP addresses.

9 8. Additionally, Yahoo! also identified the IP address 207.244.175.200, which is registered
10 to Atlantic Broadband.

11 9. Plaintiff similarly moved the court for permission to seek early discovery from Atlantic
12 Broadband, which was granted on February 1, 2011. ECF No. 14.

13 10. The Plaintiff issued the subpoena to Atlantic Broadband and in turn received the identity
14 of a Jennifer Arias-Marquez.

15 11. On February 10, 2011, I performed a Google search and was able to locate her phone
16 number.

17 12. On the same date, at approximately 1:04 p.m. Pacific Time, I called the number and a
18 man answered. He confirmed that the address was the same as that provided by Atlantic
19 Broadband.

20 13. When I asked to speak to Corey, I was told that Corey was not available but would return
21 soon. I asked the man how to spell Corey's last name, and he responded "Debarros."

22 14. This shows that Corey Debarros is also known to the Internet subscriber of the address
23 provided by Atlantic Broadband.

24 15. The Defendant, known previously as only "Corey" had a Blogger profile, which included
25 a picture. Exh. 1.

26 16. Upon learning the name "Corey Debarros," a Google search revealed a Friendster profile
27 for Corey Debarros, using the same photograph as the "Corey" Blogger profile. Exh. 2.

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1 17. Accordingly, the Plaintiff has more than a good faith belief that the Defendant,
2 previously identified only as "Corey" is actually Corey Debarros.

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Date: March 4, 2011.

s/ Marc Randazza
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed using this Court's CM/ECF system on March 4, 2011. A copy of this motion has been sent via US Mail and email to Corey Debarros.

Dated: March 4, 2011

Respectfully submitted,

s/ Marc Randazza
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