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10 **UNITED STATES DISTRICT COURT**
11 **SOUTHERN DISTRICT OF CALIFORNIA**
12 **SAN DIEGO DIVISION**

| | | | |
|----|-----------------------------------|---|-------------------------------------|
| 11 | LIBERTY MEDIA HOLDINGS, LLC |) | CASE NO.: 10-MC-1478 |
| 12 | |) | |
| 13 | Plaintiff, |) | AMENDED NOTICE OF MOTION AND |
| 14 | |) | MOTION FOR ASSIGNMENT ORDER |
| 15 | vs. |) | Hearing Date: January 18, 2011 |
| 16 | |) | Hearing Time: 10:30 a.m. |
| 17 | JUSTIN KRUEGER a/k/a JAKE LYONS, |) | Judge: Irma E. Gonzalez |
| 18 | an individual; and JOHN DOES 2-10 |) | Courtroom 1 |
| 19 | |) | |
| 20 | Defendant. |) | |

21 1. NOW COMES Plaintiff Liberty Media Holdings, LLC (Liberty), and respectfully
22 requests this Court to issue an Order of Assignment.

23 2. A hearing on this motion has been set for January 18, 2011 at 10:30 a.m. in Courtroom 1.

24 3. Accordingly, pursuant to Civ. L.R. 7.1(e), Defendant's opposition shall be due January 4,
25 2011, and Plaintiff's reply brief shall be due January 11, 2011.

26 4. Plaintiff, the judgment creditor, moves the Court for an Order instructing the judgment
27 debtor to assign the judgment debtor's interest in and payments from: 1) High Drive Productions,
28 2) Jocks Studios, 3) Jet Set Men, 4) Buckshot Productions, 5) Colt Studio Group, 6) Raging
Stallion, 7) WMH Holdings, LLC d/b/a Twinks.com, 8) Citiboyz, 9) Channel 1 Releasing, 10)
Helix Studios, 11) Zubb Media d/b/a Next Door Entertainment, 12) Zubb Media d/b/a
Masonwyler.com, 13) Marina Pacific Distributors, 14) ConWest Resources d/b/a Falcon Studios,
15) TLA Entertainment Group, 16) Hot House Entertainment, 17) Studio 2000, 18) Buzz West,

1 DV8 Incorporated d/b/a JasonCurious.com, 19) Active Duty, 20) Sean Cody, 21) Randy Blue,
2 22) Chaos Men, 23) IO Group. 24) Treasure Island Media, 25) Pride Studios, Inc., 26) Lukas
3 Studios, 27) any other California entity to include any and all amounts due to JUSTIN
4 KRUEGER a/k/a JAKE LYONS for sales, model fees, commissions, affiliate payments, or for
5 any other purpose or reason.

6 5. And further, that all payments thereunder be made directly to the judgment creditor to the
7 extent necessary to pay the judgment creditor's judgment in full, including accrued interest
8 through the date of payment.

9 6. The judgment creditor also moves the court for an order restraining the judgment debtor
10 and any servant, agent, employee, or attorney for the judgment debtor and any person(s) in active
11 concert and participating with the judgment debtor from encumbering, assigning, disposing, or
12 spending funds set forth above and any and all rights to payment thereunder.

13 7. This motion is made on the grounds that the judgment creditor has a judgment against the
14 judgment debtor, the balance due on which is \$54,160, plus interest at 6% per annum from
15 October 8, 2010, and that the judgment debtor has an assignable right to the payments described
16 herein and that there is a need to restrain the judgment debtor.

17 8. This motion is based on this notice, the supporting declaration of Marc Randazza (Doc.
18 2-2 filed and served on 12/8/10), the Memorandum of Points and Authorities (Doc. 2-1 filed and
19 served on 12/8/10), and the complete files and records of this action.

20
21 Dated: December 16, 2010

s/ Marc Randazza
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CERTIFICATE OF SERVICE

1
2 The undersigned does certify that on this 16th day of December 2010, he did file the
3 foregoing document using the CM/ECF system, and has sent copies of all the documents to
4 defendant via email at krueger21@yahoo.com and U.S. Mail at 1009 N.E. 23rd Drive, Wilton
5 Manors, FL 33305.

6
7 /s Marc J. Randazza
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