

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

LIBERTY MEDIA HOLDINGS, LLC

Plaintiff,

vs.

JOHN DOE d/b/a SUNPORNO.COM,
MONIKER PRIVACY SERVICES
REGISTRANT 2125963, and DOES 1-50

Defendants

Case No. 11-cv-62107-KMW

**DECLARATION OF BRIAN DUNLAP IN
SUPPORT OF COMPLAINT AND
REQUEST FOR INJUNCTIVE RELIEF
AND JURY TRIAL**

I, Brian Dunlap, declare under penalty of perjury that:

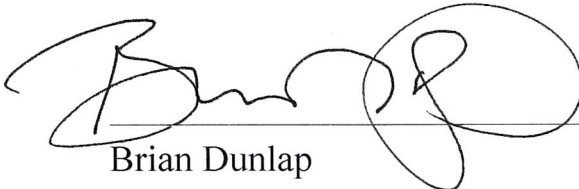
1. I am over the age of 18 and am a resident of the State of Nevada.
2. I have personal knowledge of the facts herein, and if called as a witness, could testify competently thereto.
3. I am employed as the Chief Operating Officer by Liberty Media Holdings, LLC.
4. Liberty did not authorize Defendants to duplicate and/or distribute any of its works, nor would Liberty ever contemplate doing so
5. Liberty produces and distributes high quality adult entertainment films. It is the custom and practice to register each and every film with the United States Copyright Office.
6. A true and correct copy of our copyright certificates for “Noah and Mandy”, “Josh and Mandy”, “Dawson and Mandy”, “Chris and Mandy”, and “Tanner and Mandy” are attached to the complaint as Exhibit J.
7. Copyright certification for “Philip Fucks Trey” is currently pending.

8. Liberty's pay-per-view website offers videos of similar quality and length for a minimum of \$3.95 per view.

9. If SunPorno users had paid the \$3.95 to view the videos, Liberty would have received funds of the following amounts:

- a. "Noah and Mandy" - \$57,188.10
- b. "Josh and Mandy" - \$390,911.75
- c. "Dawson and Mandy" - \$25,224.70
- d. "Chris and Mandy" - \$17,656.50
- e. "Tanner and Mandy" - \$51,646.25
- f. "Philip Fucks Trey" - \$137,969.55.

Signed under penalty of perjury on September 22, 2011 in Las Vegas, NV



Brian Dunlap