

EXHIBIT A

EXHIBIT B

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

LIBERTY MEDIA HOLDINGS, LLC,

Plaintiff,

v.

SWARM SHARING HASH FILE A3E et al.,

Defendants.

Civil Action No. 11-cv-10801-WGY

OFFER OF JUDGMENT PURSUANT TO FED. R. CIV. P. 68

WHEREAS, defendant Gisele Azar ("Defendant") acknowledges and agrees that a failure to secure an internet router by password protection may invite infringing uses of copyrighted materials accessible to individuals through such a router; and

WHEREAS, Defendant wishes to avoid the expense and uncertainty of continued litigation; and

WHEREAS, Defendant has had the opportunity to consult with his undersigned attorney and understands the legal effect of this offer,

NOW, THEREFORE, Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendant, by her undersigned attorney, hereby makes an offer of judgment in the above-captioned action as follows:

1. With respect to Count 1, Direct Copyright Infringement, judgment shall be entered in favor of Plaintiff and against Defendant in the amount of \$200.00, as defendant takes the position that if she committed any infringement at all, it is as an innocent infringer.

2. With respect to Count 2, Contributory Copyright Infringement, judgment shall be entered in favor of Plaintiff and against Defendant in the amount of \$200.00, as defendant takes the position that if she committed any infringement at all, it is as an innocent infringer.

3. With respect to Count 3, Civil Conspiracy, judgment shall be entered in favor of Plaintiff and against Defendant in the amount of \$1, as Defendant takes the position that she has not conspired with any other parties in any manner, but the \$1.00 offered is to buy her peace.

4. With respect to Count 4, Negligence, judgment shall be entered in favor of Plaintiff and against Defendant in the amount of \$10,000.00.

5. Accordingly, the entire judgment that shall be entered against Defendant shall be \$10,401.00 inclusive of costs and attorneys' fees.

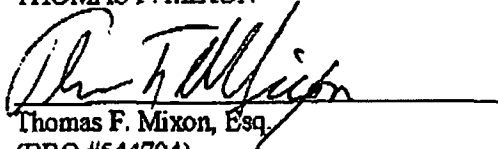
6. With respect to Count 4, Negligence, Defendant shall secure her internet router and to deny use of his internet connection to anyone who would engage in infringing conduct; and

7. This offer of judgment is made exclusively for the purposes specified in Rule 68 of the Federal Rules of Civil Procedure, and is not to be construed as an admission that Defendant is liable in this action or that Plaintiff has suffered any injury.

8. Pursuant to Rule 68 of the Federal Rules of Civil Procedure, this offer may be accepted by written notice served on or before March 7, 2012, after which this offer shall be deemed rejected.

Dated: March 6, 2012

THOMAS F. MIXON



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