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8 Attorneys for Plaintiff,
9 Liberty Media Holdings, LLC

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 LIBERTY MEDIA HOLDINGS, LLC)
13 Plaintiff,)

Case No. 12-cv-00923-LRH-GWF

14 vs.)

**MOTION FOR LEAVE TO CONDUCT
IMMEDIATE DISCOVERY**

15 SERGEJ LETYAGIN d/b/a)
16 SUNPORNO.COM, IDEAL CONSULT,)
17 LTD., “ADVERT”, “CASTA”,)
18 “TRIKSTER”, “WORKER”, “LIKIS”,)
19 “TESTER” and DOES 1-50)

20 Defendants)

21 Plaintiff Liberty Media Holdings respectfully requests that the Court issue an Order
22 granting leave to take immediate discovery. On June 6, 2012, the Court corrected the docket to
23 list Ideal Consult, Ltd., “advert,” “Casta,” “Trikster,” “worker,” “likis,” and “tester” as aliases of
24 Defendant Letyagin. Plaintiff does believe that Ideal Consult, Ltd. is an alter ego of Defendant
25 Letyagin. Plaintiff also believes that it is very possible that the users posting Liberty’s materials
26 on the SunPorno.com website¹ may have also been Defendant Letyagin. However, at this point
27 in time, it cannot be determined if these are actually aliases of Letyagin or merely other
28 individuals acting in concert with Letyagin and his website. Plaintiff seeks leave to conduct

¹ The user names “advert,” “Casta,” “Trikster,” “worker,” “likis,” and “tester” posted Liberty’s works on the SunPorno.com website.

1 immediate discovery in order to attempt to determine the true identities of the SunPorno.com
2 posters “advert,” “Casta,” “Trikster,” “worker,” “likis,” and “tester.”

3 Plaintiff could not obtain stipulation for this motion because Plaintiff cannot identify
4 these Defendants, other than with their user names on the SunPorno.com website, until the
5 requested discovery takes place. The relevant defendants have not entered an appearance, thus
6 their concurrence could not be sought. Plaintiff seeks this order so that it may obtain information
7 leading to the identities of these Defendants from Letyagin and the SunPorno.com website. This
8 Motion is based upon the attached Memorandum of Points and Authorities.

9
10 Dated: June 18, 2012

Respectfully Submitted,
s/Marc J. Randazza

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CERTIFICATE OF SERVICE

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3 I hereby certify that the foregoing document was filed using this Court's CM/ECF system
4 on June 18, 2012. A copy of these documents has been mailed to Constance M. Alt, Jennifer E.
5 Riden, Evan Marc Fray-Witzer, and Valentin David Gurvits via the addresses on file in Northern
6 District of Iowa Case Number 11-cv-3041. A copy of these documents has also been emailed to
7 webmaster@sunporno.com, clipinspector@gmail.com, tgpalliance@gmail.com, and
8 webmaster@nightangel.com. This service is in compliance with the Order at ECF 9. As no other
9
10 Defendants have been identified, they cannot be served.

11
12 Dated: June 18, 2012

Respectfully Submitted,
s/Marc J. Randazza _____

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