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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

LIBERTY MEDIA HOLDINGS, LLC )  
Plaintiff, )  
vs. )  
SERGEJ LETYAGIN d/b/a )  
SUNPORNO.COM, IDEAL CONSULT, )  
LTD., "ADVERT", "CASTA", )  
"TRIKSTER", "WORKER", "LIKIS", )  
"TESTER" and DOES 1-50 )  
Defendants )

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

**DECLARATION OF DARREN EPSTEIN IN  
SUPPORT OF REPLY TO DEFENDANT  
LETYAGIN AND IDEAL CONSULT,  
LTD.'S OPPOSITION TO PLAINTIFF'S  
MOTION FOR LEAVE TO CONDUCT  
IMMEDIATE DISCOVERY**

I, DARREN EPSTEIN, being over 18 years of age, having personal knowledge of the facts set forth herein, and being competent to testify to the same if called to do so at trial, state as follows:

1. I am a resident of the state of Florida and owner of a licensed investigative agency and process service company. I am the director of Counter-Intelligence Services and we provide worldwide investigation and process serving services to many customers, including the Plaintiff.

2. Marc J. Randazza first contacted me on Friday, October 14, 2011 about overseas services in this matter. He requested that I research effecting service on Ideal Consult, Ltd. in the Seychelles. Mr. Randazza contacted me again to inquire about service in the Czech Republic



1 on December 12, 2011, requesting that I research effecting service on Sergej Letyagin in Prague  
2 in the Czech Republic.

3 3. I engaged in an investigation of both the Defendants and their addresses, as  
4 provided by Liberty. After investigating, I determine that none of the addresses were reliable. I  
5 was unable to determine the veracity of any of the addresses purported to belong to Sergej  
6 Letyagin or Ideal Consult, Ltd. Furthermore, I was unable to determine that these individuals  
7 resided at or were located at these addresses.


8 4. Given that I could not confirm the addresses were valid through my normal  
9 means, I quoted Mr. Randazza figures of approximately \$5,000 to attempt service in Prague and  
10 approximately \$20,000 to attempt service in the Seychelles.

11 5. However, I had no way to guarantee that the addresses were valid. At the time, I  
12 suspected that these addresses were not true and correct addresses where service could actually  
13 be completed.

14 6. Accordingly, it was my professional opinion that it was not a good use of  
15 resources for Liberty to engage in a \$25,000 "wild goose chase" when this particular set of  
16 Defendants seemed to be evasive.

17  
18 I hereby certify that the foregoing is true and correct to the best of my knowledge, sworn  
19 under the penalties of perjury under the laws of the United States.

20 Dated this 11 day of July, 2012 in Fort Lauderdale, Florida.  
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25 \_\_\_\_\_  
26 DARREN EPSTEIN  
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