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**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Liberty Media Holdings, LLC, a California Corporation)
Plaintiff,)
vs.)
FF Magnat Limited d/b/a Oron.com; Maxim Bochenko a/k/a Roman Romanov; and John Does 1-500,)
Defendants.)

Case No.: 2:12-cv-01057

**DECLARATION OF NATHAN GLASS IN
OPPOSITION TO DEFENDANTS’
EMERGENCY MOTION FOR
DISBURSEMENT OF FUNDS**

**DECLARATION OF NATHAN GLASS IN OPPOSITION TO DEFENDANTS’
EMERGENCY MOTION FOR DISBURSEMENT OF FUNDS**

I, Nate Glass, being over 18 years of age, having personal knowledge of the matters set forth herein, and being competent to testify about them if called to do so at trial, state as follows:

1. I am the owner and principal of Takedown Piracy LLC, d/b/a Takedown Piracy, a California limited-liability company that identifies online copyright infringements and sends take-down notices pursuant to the Digital Millennium Copyright Act (“DMCA”), 17 U.S.C. § 512(c)(3)(A). I have operated this business for over three (3) years.

1 2. I have sent millions of take-down notices pursuant to 17 U.S.C. § 512(c)(3)(A)
2 (hereinafter, “DMCA notices”) to sites that host or provide access to copyright infringing files.

3 3. One site that I have sent thousands of DMCA notices to is Oron.com, operated by
4 defendant FF Magnat Limited.

5 4. The defendant has been difficult and inconsistent with its response to and
6 compliance with DMCA notices. Its contentious relationship with rights holders and their agents,
7 such as my company, is emboldened by their hosting company, Leaseweb B.V., and its sister
8 company, Leaseweb USA (collectively, “Leaseweb”).

9 5. Leaseweb, whether based in the Netherlands or the USA, is the hosting company of
10 choice for sites trafficking in pirated, copyright infringing files.

11 6. I have sent a significant number of DMCA notices – easily in the thousands – to the
12 following websites that are hosted by Leaseweb. Oron.com, zmafia.com, OronHD.com,
13 IntPorn.com, SoftwareTube.org, PornMade.com, Free18.net, and Uploaded.to.

14 7. In my experience sending tens of thousands of DMCA notices, Leaseweb hosts
15 many of the sites to which I send DMCA notices.

16 8. When the DMCA notices I send to a website and its operator are ineffective, I have
17 found that sending them to the hosting company can be effective in getting the infringing content
18 removed.

19 9. This is infrequently the case with Leaseweb, which in my experience vigorously
20 defends its customers’ hosting of copyright infringing materials and acts as a hindrance to rights
21 enforcement.

22 10. For example, Leaseweb USA will respond to my DMCA notices to it, after its
23 relevant customers have refused to remove infringing content on their own, with references to
24 Dutch copyright laws requiring notice to be given to the site operator – despite these sites being
25 hosted in the United States.

26 11. In my dealings with Leaseweb B.V., the company has refused to take action on
27 DMCA notices unless the customer is also provided notice of the infringement. Leaseweb B.V.

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1 provides an automated e-mail response to every DMCA notice I send them, informing me of this
2 fact.

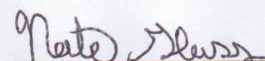
3 12. Even when I have sent Leaseweb B.V. DMCA notices that copy their relevant
4 customer, whose website is serving the infringing content, I have received this automated notice.
5 Leaseweb rarely, if ever, follows up on any notices I have sent to them. Our notices contain every
6 bit of information they require, yet they take no action.

7 13. Relative to other hosting companies I have dealt with, including GoDaddy,
8 Softlayer, Google, Advanced Hosters and FDC Servers, Leaseweb is among the **worst** at
9 remedying copyright infringement as required by law – in particular, the DMCA.

10 14. As seen from the significant number of websites dedicated to copyright
11 infringement for which Leaseweb provides hosting, it appears to me that a significant amount of
12 Leaseweb's known customer base – and revenue – is composed of sites dedicated to committing,
13 facilitating and monetizing the piracy of copyrighted material.

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16 I declare under penalty of perjury that the foregoing is true and correct to the best of my
17 knowledge.

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19 Dated: June 28, 2012 in Canoga Park, California

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Nathan Glass