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10 Attorneys for Plaintiff,
11 Liberty Media Holdings, LLC

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

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

Case No.: 2:12-cv-01057

**REPLY TO DEFENDANT MAXIM
BOCHENKO’S JOINDER [ECF 77]**

21 Plaintiff Liberty Media Holdings, LLC contests Defendant Maxim Bochenko’s joinder. If
22 Bochenko was truthful in his sworn declaration (ECF 21-1), the preliminary injunction should have
23 little effect on him. The preliminary injunction pertains primarily to the Defendant FF Magnat
24 Limited, its funds, and its operation of the Oron.com website and associated websites. While the
25 Court ordered Mr. Bochenko’s accounts frozen (ECF 13), Plaintiff has yet to locate any of Mr.
26 Bochenko’s accounts and provide the institutions managing those accounts with the Court Order
27 and Mr. Bochenko has not volunteered that information. Given that Mr. Bochenko claims that he
28 “has never worked for or been employed by FF MAGNAT LIMITED or any affiliated company,”

1 he should have little to no interest in the preliminary injunction or its effects. ECF 21-1 ¶ 8.
2 Plaintiff also finds it curious that Mr. Bochenko seems to have no interest in the enforcement of the
3 settlement agreement (ECF 44-2) – an agreement that would allow him to be removed from the
4 case without proving any considerations whatsoever to the Plaintiff.

5 That said, on July 24, 2012, the Plaintiff received a package of documents from a Mr. Oleg
6 Karapetian, which appear to conclusively demonstrate that Mr. Bochenko has perjured himself, and
7 that Bochenko is a key contact person in the Oron organization. He was cagey in his declaration,
8 stating that he is not an “employee ... [or] owner....” Meanwhile, he apparently has an
9 overwhelming amount of control over Oron’s operations, billing, payment processing, and other
10 advertising. Whatever his title is, he seems to clearly be a driving force behind many of Oron’s
11 operations. When Mr. Karapetian can be located to authenticate the documents, or when Bochenko
12 sits for a deposition, they will be made of record in this case.

13 While Plaintiff will defer to the Court’s wishes on the matter, the Court should not reject
14 Plaintiff’s request because of Defendant Bochenko’s joinder.

15 Dated: August 3, 2012
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17
18 Respectfully Submitted,

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20 s/Marc J. Randazza

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CERTIFICATE OF SERVICE

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I hereby certify that the foregoing document was filed using this Court's CM/ECF system on August 3, 2012.

Dated: August 3, 2012

Respectfully Submitted,

s/Marc J. Randazza

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