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4 *Attorney for Plaintiff*
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6
7 IN THE UNITED STATES DISTRICT COURT FOR THE
8
9 NORTHERN DISTRICT OF CALIFORNIA
10
11 SAN FRANCISCO DIVISION

11 FIRST TIME VIDEOS, LLC,)
12)
13 Plaintiff,) **No. C-11-03822 MEJ**
14 v.) **RULE 26(f) REPORT**
15 DOES 1-95,)
16 Defendant(s).)

17 **RULE 26(f) REPORT**

18 Plaintiff First Time Videos, LLC, by and through its counsel, hereby submits this Rule 26(f)
19 Report pursuant to the Court’s Order Setting Initial Case Management Conference and ADR
20 Deadlines (Doc. No. 2), Federal Rules of Civil Procedure (hereinafter “FRCP”) Rules 26(a)(1) and
21 26(f), and Northern District of California Civil Local Rule (hereinafter “L.R.”) 16-9(a):

22 **1. Individuals Likely to Have Discoverable Information:**

- 23
- 24 • Chris Stoval, Manager of FTV
 - 25 • Peter Hansmeier – 161 North Clark Street, Suite 3200, Chicago, Ill., 60601.
 - 26 • Person Most Knowledgeable (“PMK”) at each ISP’s Subpoena Department listed in
27 Exhibit A of the Complaint – Legal Department Compliance Contact Information.
28

- 1 • Subscriber(s)/Doe Defendant(s) – Currently unidentified.
- 2 • Plaintiff reserves the right to add to this list of individuals identified as necessary in
- 3 the future.

4

5 **2. Documents, Electronically Stored Information, and Tangible Things:**

- 6 • Physical Documents – Plaintiff’s copyright records.
- 7 • Electronically Stored Information – BitTorrent auditor, forensic information
- 8 demonstrating infringing activity over the BitTorrent.

9 **3. Projected Discovery Timelines:**

10 At this point, any projected timelines are premature for reasons explained in Plaintiff’s Case

11 Management Conference Statement. (*See* ECF No. 12).

12 **4. Subjects on Which Discovery, Including Electronic Discovery, Will be Needed:**

13 As noted in Plaintiff’s Case Management Conference Statement (ECF No. 12), at this point,

14 Plaintiff is merely waiting on its subpoena returns. Once that information is received, Plaintiff will

15 have a better idea of whether or not further discovery will be necessary in order to properly, and in

16 good faith, name certain Doe Defendants in this case. As of now, however, it is entirely premature

17 to speculate on this issue before even receiving the relevant information from the ISPs.

18

19 **5. Objections:**

20 Plaintiff objects to the Court requiring Plaintiff to make any projected deadlines in this case

21 at this time.

22 **6. Discovery Motion Currently Pending:**

23 N/A.

24

25 **7. Other Issues:**

26 N/A.

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28

1 Respectfully Submitted,

2 STEELE HANSMEIER PLLC,

3 **DATED: November 4, 2011**

4 By: /s/ Brett L. Gibbs, Esq.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 4, 2011, all individuals of record who are deemed to have consented to electronic service are being served a true and correct copy of the foregoing document, and all attachments and related documents, using the Court's ECF system, in compliance with Local Rule 5-6 and General Order 45.

/s/ Brett L. Gibbs
Brett L. Gibbs, Esq.