

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

FIRST TIME VIDEOS LLC, a  
foreign corporation,

Case No. 1:12-cv-20921-JAL

Plaintiff,

v.

JOHN DOES 1-76,

Defendants.

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**REPLY IN SUPPORT OF NOTICE OF IMPROPER CONDUCT/MOTION FOR  
SANCTIONS**

John Does 74.4.213.245 and 74.178.230.219, (the “LS Law Does”)<sup>1</sup> by and through undersigned counsel, submit the following Reply in Support of Notice of Improper Conduct/Motion for Sanctions.

**ARGUMENT**

Counsel for the LS Law Does filed the instant Notice for the sole purpose of bringing to the Court’s attention certain actions taken by Plaintiff’s counsel. Plaintiff’s counsel in several instances has contacted the LS Law Does directly without permission from the undersigned. Any argument that Plaintiff’s counsel was not aware that the LS Law Does were represented is simply not credible. The undersigned had appeared on the LS Law Does’ behalf at a hearing on July 27, 2012 and had motions pending before the Court at the time that Plaintiff’s counsel attempted to contact the LS Law Does. The undersigned simply requests that the Court take the measures that it deems just to preclude this action going forward.

**CONCLUSION**

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<sup>1</sup> The LS Law Does are identified by their IP Addresses so as to remain anonymous.

The LS Law Does request that the Court take the appropriate steps to preclude this type of behavior from taking place in the future to include, but not limited to, payment of the cost of filing this Notice / Motion for Sanctions, and whatever other relief the Court deems just and proper.

Respectfully submitted,

LALCHANDANI SIMON PL

By: /s/ Danny Simon

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*Attorneys for the LS Law Does*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing document was served on all of those parties receiving electronic notification via the Court's CM/ECF electronic filing as of August 13, 2012.

By: /s/ Danny Simon

Danny Simon, Esq.