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5 Attorney for Putative John Doe in 2:12-cv-08333-ODW-JC

6 **UNITED STATES DISTRICT COURT**  
7 **CENTRAL DISTRICT OF CALIFORNIA**

8  
9 **INGENUITY 13, LLC, a Limited**  
Liability Company Organized Under  
10 the Laws of the Federation of Saint  
11 Kitts and Nevis,

12 **Plaintiff,**

13  
14 **v.**

15 **JOHN DOE,**

16 **Defendant.**  
17  
18

Case Number: 2:12-cv-08333-ODW-JC

Case Assigned to:  
District Judge Otis D Wright, II

Discovery Referred to:  
Magistrate Judge Jacqueline Chooljian

**SUPPLEMENTAL DECLARATION  
OF MORGAN E. PIETZ**

1 I, Morgan E. Pietz, have personal knowledge of the facts alleged herein and hereby  
2 declare as follows:

3 1. I am a member in good standing of the State Bar of California, duly  
4 admitted to the practice of law in the state and federal courts of the State of  
5 California.

6 2. I represent ISP subscribers who have been targeted by Ingenuity 13,  
7 LLC, through its counsel Prenda Law, Inc. f/k/a Steele Hansemeier PLLC  
8 (“Prenda”) in copyright infringement cases Ingenuity 13 filed in both the Central  
9 District of California, and the Northern District of California. I also represent other  
10 clients in other cases brought by Prenda on behalf of other entities, sometimes along  
11 with local counsel, in other courts.

12 3. I represent a putative John Doe defendant in the case indicated on the  
13 caption above.

14 4. My clients in the Prenda cases, including this case, each received letters  
15 from their ISPs informing them that Prenda was attempting to subpoena their  
16 identity as part of a lawsuit. Generally, my clients are the people who happen to pay  
17 the Internet bill for their household, not necessarily the people who actually  
18 committed the alleged infringement or other wrongful conduct. However, Prenda  
19 constructs its lawsuits so as to make it unclear what exactly is the status of my  
20 clients. The complaint does not exactly come out and say that the ISP subscriber  
21 equals the John Doe defendant. However, the requests for early discovery, seeking  
22 leave to issue ISP subpoenas, generally tend to conflate ISP subscriber with Doe  
23 defendant.

24 5. A comprehensive “Declaration of Morgan E. Pietz re: Prenda Law,  
25 Inc.” was previously filed in this action at ECF No. 40-1. ***Exhibit letters herein are***  
26 ***continued from that prior declaration.***

27 6. I did serve the Alan Cooper written discovery on Mr. Gibbs, via  
28 overnight mail, on January 4, 2013.

1 7. Attached as Exhibit P hereto is a true and correct copy of an email  
2 chain I received wherein Mr. Gibbs notified me that Mr. Duffy would be substituting  
3 into this case as counsel of record, and an email where Mr. Duffy attempted to meet  
4 and confer with on 12-cv-8333.

5 8. Attached as Exhibit Q hereto is a true and correct copy of Alan  
6 Cooper's complaint for identity theft, etc.

7 9. Attached as Exhibit R hereto is a true and correct copy of documents  
8 identifying "Salt Marsh" as the "owner" of AF Holdings.

9 10. Attached as Exhibit S hereto is a true and correct copy of a declaration  
10 attorney Nicholas Ranallo prepared regarding Anthony Saltmarsh.

11 11. Attached as Exhibit T hereto is a true and correct copy of a website  
12 registration document showing "Alan Cooper" at an address in Phoenix linked to,  
13 John Steele, his sister and Anthony Saltmarsh.

14 12. Attached as Exhibit U hereto is a true and correct copy of the petition in  
15 the St. Clair County Guava, LLC case, which appears to be verified by "Alan Moay"  
16 or "Alan Mony".

17 13. Attached as Exhibit V hereto is a true and correct copy of my reply in  
18 the St. Clair County Guava, LLC case.

19 14. Attached as Exhibit W hereto is a true and correct copy of the  
20 declaration about the collusion in a Minnesota Guava LLC case.

21 15. John Steele told me, in front of others, on February 13, 2013 in St. Clair  
22 County that he is currently of counsel to Prenda Law.

23 16. Attached as Exhibit X hereto is a true and correct copy of a demand  
24 letter, dated January 30, 2013, from the St. Clair County case listing Mr. Gibbs as in  
25 house counsel for Guava, LLC.

26 17. Attached as Exhibit Y hereto is a true and correct copy of a letter Mr.  
27 Duffy sent to Judge Scriven in Florida wherein he represents that he is the sole  
28 principal of Prenda Law.

1           18. Attached as Exhibit Z hereto is a true and correct copy of Mr. Duffy’s  
2 bio from the wefightpiracy.com website, accessed February 20, 2013.

3           19. Attached as Exhibit AA hereto is a true and correct copy of John L.  
4 Steele’s LinkedIn profile where he states that he “sold [his] client book to Prenda  
5 Law in 2011.”

6           20. Attached as Exhibit BB hereto is a true and correct copy of a complaint  
7 listing wherein Paul Hansemeier’s firm Alpha Law Firm, LLC represents Guava,  
8 LLC in Minnesota.

9           21. Attached as Exhibit CC hereto is a true and correct copy of the  
10 LinkedIn profile for Michael Dugas listing Prenda Law.

11           22. Attached as Exhibit DD hereto is a true and correct copy of an  
12 unpublished Ninth Circuit sanctions opinion.

13  
14 I declare under penalty of perjury under the laws of the United States of America  
15 that the foregoing is true and correct.

16  
17 Respectfully submitted,

18  
19 DATED: February 20, 2013

20 Executed this day at Manhattan Beach, California, by

21  
22 */s/ Morgan E. Pietz*

23 Morgan E. Pietz, Declarant  
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