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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
Kitts and Nevis,
11

12 Plaintiff,

13
14 v.

15 JOHN DOE,

16 Defendant.
17

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

Case Assigned to:
District Judge Otis D Wright, II

Discovery Referred to:
Magistrate Judge Jacqueline Chooljian

Case Consolidated with Case Nos.:
2:12-cv-6636; 2:12-cv-6669; 2:12-cv-
6662; 2:12-cv-6668

**[PROPOSED] ORDER DENYING EX
PARTE APPLICATION FOR ORDER
WITHDRAWING ORDER FOR JOHN
STEELE, PAUL HANSEMEIER,
PAUL DUFFY, AND ANGELA VAN
DEN HEMEL TO APPEAR**

1 **ORDER**

2 The Court, having duly considered the “Ex Parte Application for Order
3 Withdrawing Order for John Steele, Paul Hansemeier, Paul Duffy, and Angela Van
4 Den Hemel to Appear” (the “**Application**”) filed by specially appearing counsel,
5 and the opposition thereto, hereby rules as follows:

6 **(a) Personal Jurisdiction**

7 John Steele has sent at least one demand letters into the State of California,
8 seeking to pressure Internet users into settling copyright infringement claims. Dec’1
9 of Nicholas Ranallo, Exh. 1. Further, Mr. Steele has conducted media interviews,
10 with California publications, about his California cases. *See*
11 [http://www.sfgate.com/business/article/Lawsuit-says-grandma-illegally-](http://www.sfgate.com/business/article/Lawsuit-says-grandma-illegally-downloaded-porn-2354720.php)
12 [downloaded-porn-2354720.php](http://www.sfgate.com/business/article/Lawsuit-says-grandma-illegally-downloaded-porn-2354720.php). Accordingly, both general and specific jurisdiction
13 exists over John Steele.

14 Paul Hansemeier travelled to San Francisco California to appear as the
15 30(b)(6) deponent of AF Holdings, LLC in a case pending in the Northern District of
16 California. *See* ECF No. 69. Accordingly, both general and specific jurisdiction
17 exists over Paul Hansemeier.

18 Paul Duffy is a member of the State Bar of California.¹ Further, he
19 substituted in as counsel of record in various AF Holdings and Ingenuity 13 cases
20 pending in the Northern District of California (*see e.g.*, Exhibit EE²) and has
21 attempted, at his own initiative, to meet and confer regarding this case, C.D. Cal. 12-
22 cv-8333 (*see* Exhibit P). *See also* ECF No. 52, p. 10. Accordingly, both general and
23 specific personal jurisdiction exists over California courts for Paul Duffy.

24
25
26 _____
27 ¹ *See* <http://members.calbar.ca.gov/fal/Member/Detail/224159>

28 ² The Exhibit lettering used herein refers to the Exhibits to prior declarations previously filed in
this case *see* ECF Nos. 40-1; 40-2; 53-1; 53-2; 59-1; 59-2.

1 Angela Van Den Hemel was identified by Mr. Gibbs as being the person who
2 violated this Court's discovery order. Accordingly, specific jurisdiction exists over
3 Angela Van Den Hemel.

4 **(b) Time**

5 The Court finds the argument that the amount of time for the moving parties
6 to respond unpersuasive.

7
8 Accordingly, the Court DENIES the Application. The moving parties are ordered to
9 appear at the Monday March 11, 2013 hearing in this matter.

10
11 DATED: March 8, 2013

12 _____
13 Honorable Otis D. Wright, II
14 United States District Judge