

EXHIBIT P



Morgan Pietz <morganpietz@gmail.com>

Activity in Case 2:12-cv-08333-ODW-JC Ingenuity13 LLC v. John Doe Order

Morgan Pietz <morganpietz@gmail.com>

Fri, Feb 8, 2013 at 11:36 AM

To: Prenda <paduffy@wefightpiracy.com>

Cc: "Morgan E. Pietz" <mpietz@pietzlawfirm.com>, Brett Gibbs <bgibbs@wefightpiracy.com>

No luck reaching you.

Please send me your part of the joint letter on the PO issue in N.D. Cal. No. 12-4976 by close of business today. This nonsense has gone on long enough. Note that you do NOT have my permission to simply file the letter. You and Brett have now wasted so much time that circumstances have changed and I need to update my part.

I am tied up in Court the rest of the day. Have a nice weekend.

Best regards,
Mirgan

Sent from my iPhone

On Feb 8, 2013, at 11:31 AM, Morgan Pietz <morganpietz@gmail.com> wrote:

Paul I just tried that number and it went straight to a 'voicemailbox that has not been setup yet.'

I am going to try again two more times, right now.

Sent from my iPhone

On Feb 7, 2013, at 4:59 PM, Prenda <paduffy@wefightpiracy.com> wrote:

3128526136

On Feb 7, 2013, at 6:33 PM, Morgan Pietz <morganpietz@gmail.com> wrote:

What number should I call?

On Thu, Feb 7, 2013 at 3:57 PM, Prenda <paduffy@wefightpiracy.com> wrote:

I am representing that I will participate in the conference call that you agreed to participate in tomorrow. If there is something substantive you would like to talk about then I am all ears. Thanks.

On Feb 7, 2013, at 5:14 PM, Morgan Pietz <morganpietz@gmail.com> wrote:

Paul,

Since you seem to have an aversion to reading, I'll make this short then: are you representing that I should consider you as counsel of record in this case or not?

I do plan to speak with you tomorrow at 11:30, at the very least about some other cases, but whether we will be covering *this* case depends on your answer to my question above.

Best regards,
Morgan

On Thu, Feb 7, 2013 at 3:12 PM, Prenda <paduffy@wefightpiracy.com> wrote:

I agreed to have a meet and confer with you tomorrow. If you are canceling please let me know and we can reschedule. Your email message (below) and your other messages are too long for me to read but I am happy to talk directly with you about whatever you want. Thanks.

On Feb 7, 2013, at 4:33 PM, Morgan Pietz <morganpietz@gmail.com> wrote:

Brett and Paul,

I just noticed that the most recent email to me below appears to be from Paul Duffy not Brett Gibbs, who I understand has recently moved on to be the purported 'in-house counsel' for assorted Prenda-related entities.

With respect to the case identified in the subject line, Mr. Gibbs is still counsel of record, and, as Mr. Gibbs himself correctly pointed out, no substitution has yet been filed making Paul Duffy counsel of record in this matter.

Accordingly, Paul, if you would like to have a substantive discussion on *this* case, and the impending threat of sanctions which neither you nor Brett have responded to, I must insist that you enter some kind of appearance first. However, I would indeed like to keep our 11:30 a.m. PST phone appointment tomorrow, as I have a number of other matters, where you are properly counsel of record, which I would like to discuss with you.

I will send you separate emails about those other matters, so that we may have a more productive conversation tomorrow.

As to this matter, please advise whether I should be speaking to Mr. Duffy, to Mr. Gibbs, or to both/either of you?

Best regards,
Morgan

On Wed, Feb 6, 2013 at 6:46 AM, Morgan Pietz <morganpietz@gmail.com> wrote:

Yes, at 11:30 PST.

Sent from my iPhone

On Feb 6, 2013, at 3:05 AM, Prenda <paduffy@wefightpiracy.com> wrote:

Mr. Pietz - please let me know if you are free to meet and confer by telephone on Friday, February 8 at 9:am or later your time. Thanks.

On Jan 30, 2013, at 8:18 PM, "Morgan E. Pietz" <mpietz@pietzlawfirm.com> wrote:

Brett,

Since Mr. Duffy has not yet appeared in this case, and, as you correctly note, no substitution has been filed, much less approved, then, you are quite right: you are still counsel of record. You know as well as I do that this matter is not concluded; the Court has not yet approved your voluntary dismissal (the Copyright Report is not what matters) and the minute order below, as well as my prior notice to you that I am likely going to be seeking sanctions, clearly mean that litigation here is not quite over yet. As I am sure you know, a federal Court retains jurisdiction to consider sanctions, even after a complaint has been dismissed.

Accordingly, I am going to reiterate my request, one final time, for a response to my query of January 29, about whether you will be responding to the discovery on Alan Cooper in which the Court has taken an interest. Based on your most recent email, it does seem clear you are the appropriate (indeed, only) attorney to which it is appropriate to direct this question.

I am cc'ing Mr. Duffy, both as a courtesy, and in the hopes that if he does seek to substitute in on your behalf, you and/or he can first answer my other questions below to allow me to determine whether I would oppose such a request.

Best regards,
Morgan

On Wed, Jan 30, 2013 at 5:53 PM, Brett Gibbs <bgibbs@wefightpiracy.com> wrote:

Mr. Pietz:

This case has been dismissed, and recently closed by the Court. Please refer to the Court's docket.

As for any questions regarding Mr. Duffy, you can contact him yourself if you desire.

As for your statement directed at me, please note that there was no substitution of counsel form filed in the above-referenced case.

It was a pleasure working with you. Good luck in your future endeavors.

I view your attempt to dodge the Alan Cooper discovery, by unilaterally dismissing the case without prejudice, as the coup de grâce in a series of bad faith actions in this case. Please be advised, I will likely be seeking sanctions.

In view of the Court's order of earlier today, below, please advise whether you will be responding to the outstanding written discovery on Alan Cooper. If you actually respond with properly verified, substantive answers, and produce the documents demanded to my office, by the original deadline of Monday 2/4/13, by 5:00 P.M., I will consider refraining from seeking sanctions (depending on your responses).

Please advise by close of business tomorrow (1/30) whether you will be responding to the discovery by Monday (2/4).

Best regards,
Morgan

----- Forwarded message -----

From: <cacd_ecfmail@cacd.uscourts.gov>
Date: Tue, Jan 29, 2013 at 11:19 AM
Subject: Activity in Case 2:12-cv-08333-ODW-JC Ingenuity13 LLC v. John Doe Order
To: ecfnef@cacd.uscourts.gov

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

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UNITED STATES DISTRICT COURT for the CENTRAL DISTRICT OF CALIFORNIA

Notice of Electronic Filing

The following transaction was entered on 1/29/2013 at 11:18 AM PST and filed on 1/28/2013

Case Name: Ingenuity13 LLC v. John Doe
Case Number: 2:12-cv-08333-ODW-JC
Filer:

Manhattan Beach, CA 90266
mpietz@pietzlawfirm.com
Ph: (310) 424-5557
Fx: (310) 546-5301
www.pietzlawfirm.com

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Brett L. Gibbs, Esq. (SBN 251000)
Of Counsel to Prenda Law Inc.
38 Miller Avenue, #263
Mill Valley, CA 94941
415-325-5900
blgibbs@wefightpiracy.com

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Vertical lines and dashes on the left side of the page, possibly representing a list or a table structure.

EXHIBIT Q

Furthermore, he also owns land in Aitkin County, MN. Therefore he is subject to personal jurisdiction pursuant to Minn. Stat. § 543.19.

3. Defendant Prenda Law, Inc. is a corporation with principal offices in Chicago, Illinois. Prenda has directed its tortious activities described in this Complaint towards individuals residing in the State of Minnesota and otherwise directed its business activities within the State of Minnesota including filing lawsuits within the State and sending settlement demands to residents of Minnesota.
4. Defendant Prenda Law, Inc. has at various times operated under the names “Steele Hansmeier, PLLC” and “Anti Piracy Law Group” but these entities are either identical, alter-ego identities, or are successor or predecessor firms. All of these law firms have the same principals, business model, and clients.
5. Defendant AF Holdings, LLC is a Nevis based limited liability company and has brought several lawsuits in the State of Minnesota fraudulently using Plaintiff’s name as an officer or director. AF Holdings, LLC’s conduct directed at Minnesota subjects it to personal jurisdiction within the state because this lawsuits arises out of its activities within Minnesota.
6. Defendant Ingenuity13, LLC is a Nevis based limited liability company and has brought several lawsuits in the State of Minnesota fraudulently using Plaintiff’s name as an officer or director. Ingenuity13, LLC’s conduct directed at Minnesota subjects it to personal jurisdiction within the state because this lawsuits arises out of its activities within Minnesota.
7. Venue is appropriate in Hennepin County because the tortious acts occurred in part within Hennepin County, including the use of Alan Cooper’s name, by Defendants and for the benefit of Defendants in lawsuits filed in the U.S. District Court for the

District of Minnesota, located in Hennepin County.

FACTS

8. Plaintiff had been hired in 2006 as a caretaker for a property Steele owns in Aitkin County.
9. Plaintiff was allowed to stay in a guest house on the property and helped with remodeling and general maintenance of the property.
10. While visiting his property, Steele had on several occasions discussed his plans and early successes in carrying out a massive, nationwide copyright enforcement litigation strategy.
11. Steele had also told Plaintiff that if anyone asked about any companies, that Plaintiff was not to answer and to call Steele directly.
12. Plaintiff confronted Steele, but was unable to determine what companies Steele was talking about.
13. Steele has in fact sued tens of thousands of individuals for copyright infringement nationwide.
14. Plaintiff has not participated in any part of Steele's litigation activities.
15. Steele and his law firm, Steele Hansmeier, PLLC, now known as Prenda Law, Inc. have gained significant attention due to the scope of their litigation.
16. Steele claims that he is merely "of counsel" with Prenda Law, Inc., but in fact controls operations at Prenda Law, Inc.
17. Sometime in November 2012, Plaintiff was informed that his name was being used as an officer or director of AF Holdings, LLC, a client of Prenda Law, Inc.
18. In various lawsuits filed in the past year, AF Holdings, LLC through its counsel has filed copies of copyright assignment agreements that bear the signature of an "Alan

Cooper” signing on behalf of AF Holdings, LLC.

19. A copy of one such assignment is attached as Exhibit A to this Complaint.
20. The signature of “Alan Cooper” in Exhibit A was not made by Plaintiff.
21. On at least one occasion, an “Alan Cooper” has acted as the manager of another client of Prenda Law, Ingenuity13, LLC.
22. A copy of one such document is attached as Exhibit B to this Complaint.
23. Again, Plaintiff did not sign the document shown as Exhibit B.
24. As described above, Steele and Plaintiff entered into an agreement for Cooper to care for Steele’s property, a copy of that agreement is attached as Exhibit C.
25. Steele and the other Defendants used the signature in Exhibit C or another of Plaintiff’s signatures as the model for creating the signature that appears on Exhibit A.
26. AF Holdings, LLC has filed over 200 copyright lawsuits in federal district courts across the nation within the past year.
27. Ingenuity13, LLC has filed over 50 copyright lawsuits in federal district courts across the nation within the past year.
28. All Defendants knew that Plaintiff’s name was being used, without Plaintiff’s knowledge, as an officer, director, or shareholder of both AF Holdings, LLC and Ingenuity13, LLC.
29. All Defendants intended to use Alan Cooper’s name for their own benefit on AF Holdings, LLC and Ingenuity13, LLC documents.
30. All Defendants have in fact benefited from using Plaintiff’s name for their own benefit on AF Holdings, LLC and Ingenuity13, LLC documents.
31. Defendants knew that Alan Cooper had not authorized the use of his name or signature on AF Holdings, LLC and Ingenuity13, LLC documents.

32. Both Steele and Prenda Law, Inc. participated in the creation of AF Holdings, LLC and Ingenuity13, LLC.
33. Defendants Steele and Prenda Law have actual control of Defendants AF Holdings LLC and Ingenuity13, LLC.
34. AF Holdings, LLC and Ingenuity13, LLC exist solely as instruments of Steele and Prenda Law, Inc.
35. Both Steele and Prenda Law, Inc. chose to organize AF Holdings, LLC and Ingenuity13, LLC in the nation of St. Kitts & Nevis because of the strict corporate privacy laws in that country.
36. Plaintiff's counsel made several attempts to contact Defendants about the use of the name "Alan Cooper" in lawsuits by AF Holdings, LLC and Ingenuity13, LLC.
37. Defendant Steele, when he heard that Prenda Law, Inc. had been contacted by Plaintiff's counsel did not respond to Plaintiff's counsel but rather called Plaintiff several times within a matter of minutes.
38. Despite repeated requests by Plaintiff's counsel, Defendants have not offered any explanation as to why Alan Cooper's name appears on documents relating to lawsuits filed by AF Holdings, LLC and Ingenuity13, LLC.
39. Plaintiff through his counsel filed the letter attached as Exhibit D in cases filed by AF Holdings, LLC and Ingenuity13, LLC in the District of Minnesota.
40. Defendants have claimed that the letter is "false" but have never attempted to explain what in particular about the allegations contained within that letter are false.
41. Defendants have never identified another person by the name of Alan Cooper who could plausibly have signed the documents shown as Exhibit A or Exhibit B.

COUNT I

INVASION OF PRIVACY - APPROPRIATION

42. Plaintiff repeats and realleges the above as if fully set forth below.
43. Defendants have appropriated Plaintiff's name for their own benefit.
44. Defendants did not have Plaintiff's permission to use his name to sign documents on behalf of AF Holdings, LLC or Ingenuity13, LLC
45. Defendants knew that they did not have Plaintiff's permission to use his name to sign documents on behalf of AF Holdings, LLC or Ingenuity13, LLC
46. Defendants intended to benefit and in fact did benefit by using Alan Cooper's name for corporate documents to conceal the true identities of officers, directors, and shareholders of AF Holdings, LLC and Ingenuity13, LLC.

COUNT II

VIOLATION OF MINN. STAT. § 325D.44

47. Plaintiff repeats and realleges the above as if fully set forth below.
48. Defendants, working in concert, have engaged in the following deceptive trade practices prohibited by Minn. Stat. § 325D.44.
49. By using Plaintiff's name as if he had signed documents on their behalf, Defendants have caused a likelihood of confusion or misunderstanding as to the source, sponsorship, approval, or certification of goods or services.
50. Plaintiff is not the source of any of Defendants' goods or services and has never sponsored, approved or certified any of Defendants' goods or services.
51. By using Plaintiff's name in connection with documents signed on behalf of AF Holdings, LLC and Ingenuity13, LLC, Defendants have caused a likelihood of confusion or of misunderstanding as to affiliation, connection, or association with, or

certification by, another, namely Alan Cooper.

52. Plaintiff has no affiliation, connection, or association with Defendants and has never certified Defendants or their actions.

53. By filing documents in court, bearing Plaintiff's name, Defendant Prenda Law, Inc. has created the false appearance of affiliation, connection, association, or certification of Defendants' activities

54. Defendants actions, taken as a whole, create a likelihood that there would be confusion or misunderstanding relating to whether Alan Cooper was involved in any way with Defendants and their business activities.

COUNT III

CIVIL CONSPIRACY

55. Plaintiff repeats and realleges the above as if fully set forth below

56. All Defendants have entered an agreement to use Plaintiff's name as if he were an officer or director of Defendants AF Holdings, LLC and Ingenuity13, LLC.

57. The use of Plaintiff's name in this manner is both unlawful and tortious.

58. By entering into this agreement, all Defendants have conspired to commit tortious acts as described within this Complaint.

59. Plaintiff has been damaged by these unlawful and tortious acts.

60. Each Defendant must therefore be held liable for any tortious act committed by any other Defendant.

COUNT III

ALTER EGO - PIERCING CORPORATE VEIL - AF HOLDINGS, LLC

61. Plaintiff repeats and realleges the above as if fully set forth below.

62. AF Holdings, LLC is not a properly organized limited liability corporation.

63. Upon information and belief, AF Holdings, LLC is a mere instrumentality of Steele and Prenda Law, Inc.
64. AF Holdings, LLC has never had an officer or director named Alan Cooper who signed the document shown as Exhibit A.
65. Upon information and belief, either Steele or someone working at his request signed the document as "Alan Cooper" shown as Exhibit A.
66. Upon information and belief, AF Holdings, LLC has no true officers or directors.
67. Upon information and belief, AF Holdings, LLC has fraudulently used Plaintiff's name and thereby used the LLC to perpetrate a fraud.
68. Upon information and belief, AF Holdings, LLC is and at all times was insufficiently capitalized for purposes of corporate undertaking.
69. Upon information and belief, AF Holdings, LLC observed little or no corporate formalities.
70. Upon information and belief, AF Holdings, LLC was insolvent or non-existent at time of the copyright assignment in question and throughout 2012 when it initiated numerous lawsuits.
71. Upon information and belief, AF Holdings, LLC's funds, to the extent it had any, were used solely for the benefit of the dominant members.
72. Upon information and belief, AF Holdings, LLC did not have functioning officers or directors other than its attorneys including Defendant John Steele.
73. Upon information and belief, AF Holdings, LLC has little or no corporate records.
74. Upon information and belief, AF Holdings, LLC's existence was a mere facade for individual dealings of its dominant members.
75. For the reasons above, AF Holdings, LLC's owners or members must be liable for AF

Holdings, LLC's actions.

COUNT IV

ALTER EGO - PIERCING CORPORATE VEIL - INGENUITY13, LLC

76. Plaintiff repeats and realleges the above as if fully set forth below.
77. Ingenuity13, LLC is not a properly organized limited liability corporation.
78. Upon information and belief, Ingenuity13, LLC is a mere instrumentality of Steele and Prenda Law, Inc.
79. Ingenuity13, LLC has never had an officer or director named Alan Cooper who could have signed the document shown as Exhibit B.
80. Defendant Prenda Law, Inc. is obligated to retain the original signed version of the document shown as Exhibit B.
81. Plaintiff's counsel has requested to see or to be provided with a copy of the original signed version of the document shown as Exhibit B.
82. Defendants have not produced for Plaintiff's counsel copies of the signed version of the document shown as Exhibit B.
83. Upon information and belief, Ingenuity13, LLC has no true officers or directors.
84. Upon information and belief, Ingenuity13, LLC has fraudulently used Plaintiff's name and thereby used the LLC to perpetrate a fraud.
85. Upon information and belief, Ingenuity13, LLC is and at all times was insufficiently capitalized for purposes of corporate undertaking.
86. Upon information and belief, Ingenuity13, LLC observed little or no corporate formalities.
87. Upon information and belief, Ingenuity13, LLC was insolvent or non-existent at time of the copyright assignment in question and throughout 2012 when it initiated

numerous lawsuits.

88. Upon information and belief, Ingenuity13, LLC's funds, to the extent it had any, were used solely for the benefit of the dominant members.
89. Upon information and belief, Ingenuity13, LLC did not have functioning officers or directors other than its attorneys including Defendant John Steele.
90. Upon information and belief, Ingenuity13, LLC has little or no corporate records.
91. Upon information and belief, Ingenuity13, LLC's existence was a mere facade for individual dealings of its dominant members.
92. For the reasons above, Ingenuity13, LLC's owners or members must be liable for Ingenuity13, LLC's actions.

COUNT V

ALTER EGO - PIERCING CORPORATE VEIL - PRENDA LAW, INC.

93. Plaintiff repeats and realleges the above as if fully set forth below.
94. Prenda Law, Inc. was an Illinois based corporation engaged in the practice of law.
95. Prenda Law, Inc. was not properly organized as a professional services corporation under Illinois law, as required of law firms organized as corporations.
96. Prenda Law, Inc. did not file an annual renewal due in late 2012.
97. Despite having not filed an annual renewal, Prenda Law, Inc. continued to provide legal services including litigating cases on behalf of AF Holdings, LLC and Ingenuity13, LLC which made use of documents purportedly signed by Plaintiff.
98. Upon information and belief, Prenda Law, Inc. is a mere instrumentality of Steele.
99. Upon information and belief, officers of Prenda Law, Inc. have fraudulently used Plaintiff's name and thereby used the corporation to perpetrate a fraud.
100. Upon information and belief, Prenda Law, Inc. is and at all times was insufficiently

capitalized for purposes of corporate undertaking.

101. Upon information and belief, Prenda Law, Inc. observed little or no corporate formalities.

102. Upon information and belief, Prenda Law, Inc. was insolvent or non-existent at time of transaction in question.

103. Upon information and belief, Prenda Law, Inc.'s funds, to the extent it had any, were used solely for the benefit of the dominant shareholder.

104. Upon information and belief, Prenda Law, Inc. has little or no corporate records.

105. Upon information and belief, Prenda Law, Inc. was controlled by individuals other than its shareholders.

106. Upon information and belief, Prenda Law, Inc.'s existence was a mere facade for individual dealings of Steele.

107. For the reasons above, Prenda Law, Inc.'s owners or shareholders must be liable for its actions.

WHEREFORE, Plaintiff Alan Cooper prays for judgment of the Court against the Defendants for the following relief:

1. Monetary damages against all parties;
2. Reasonable costs and disbursements;
3. Injunctive relief, including, an order forbidding the further use of Plaintiff Alan Cooper's name in connection with any of Defendants' activities;
4. Declarative relief, including, a determination that Plaintiff never acted signed documents on behalf of AF Holdings, LLC or Ingenuity13, LLC and has never been an officer or director of AF Holdings, LLC or Ingenuity13, LLC;

5. Leave of the Court to amend this Complaint to add a claim for punitive damages;
6. For such other relief as the Court determines to be fair and equitable.

Dated: January 23, 2013

GODFREAD LAW FIRM, PC

By: 
Paul Godfread (389316)
100 South Fifth Street, Suite 1900
Minneapolis, MN 55402
(612) 284-7325

Attorney for Plaintiff, Alan Cooper

ACKNOWLEDGMENT

The undersigned hereby acknowledges that costs, disbursements, and reasonable attorney and witness fees may be awarded pursuant to Minnesota Statutes § 549.211, subd. 2, to the party against whom the allegations in this pleading are asserted.

Dated: January 22, 2013

GODFREAD LAW FIRM, PC

By: 
Paul Godfread (389316)

EXHIBIT R

EXHIBIT S

Nicholas Ranallo, Attorney at Law #275016
371 Dogwood Way
Boulder Creek, CA 95006
Telephone No.: (831) 703 - 4011
Fax No.: (831) 533-5073
Email: nick@ranallolawoffice.com
Attorney for Defendant Joe Navasca

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

<p>AF HOLDINGS, LLC.,</p> <p>Plaintiff,</p> <p>v.</p> <p>JOE NAVASCA</p> <p>Defendants.</p>	<p>Case No. 3:12-cv-02396-EMC</p> <p>Declaration of Nicholas Ranallo in Opposition to Motion to Shorten Time/Motion for Stay of Discovery</p>
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DECLARATION OF NICHOLAS RANALLO

1. I am an attorney duly licensed to practice in the State of California and before the District Court for the Northern District of California. I am attorney of record for Joe Navasca, and this declaration is based on personal knowledge of the matters set forth herein or, to the extent so identified, upon information and belief formed after reasonable inquiry as described herein.
2. On Friday, February 8, 2013, I received an electronic file from Joe Navasca comprised of a voicemail recording left at his residence on the same date.

Paragraph 5, below, represents my personal transcription of the voicemail message. I have retained an electronic copy of the message and can provide it to the court upon request.

3. Upon information and belief, the individual speaking in the voicemail message is Mark Lutz. This belief is based on my recognition of Mr. Lutz' voice from numerous past conversations with Mr. Lutz in his role as paralegal for Steele Hansmeier/Prenda Law.
4. On Friday, February 8, 2013, I sent a copy of the voicemail to Brett Gibbs requesting explanation. Beyond noting that I did not represent Jovino, Mr. Gibbs provided no information regarding why a law firm that is not formally involved in this case is seeking settlement from an individual that is not the defendant in this case, and/or seeking to amend the complaint to name an individual that was previously "eliminated" as a likely infringer.
5. The following represents my personal transcription of the February 8 voicemail. I have endeavored to be as accurate as possible:

"Yes, uh, this message is for Jovino. It's, uh, Anti-Piracy Law Group giving you a call about a couple of letters we mailed you which had to do with the copyright infringement lawsuit that you are a part of. And..um..yeah, I mean, we haven't entered into a settlement agreement as of yet. And, prior to moving forward and modifying the complaint to add your name, our client just asked us to give you a quick call. You know, I suppose if you want to avoid the expense and time that is associated with a case like this, call us back. We can be reached at (800) 380-0840. Your reference number is 84080. Thank you."
6. The telephone number identified in the message above is the number listed for Prenda Law, Inc., on its wefightpiracy.com web site.

7. The reference number noted above corresponds to prior letters from Plaintiff regarding the allegations of infringement from this case.

SALT MARSH

8. “Salt Marsh” is the individual identified as an “Owner” of AF Holdings in ECF No. 8 in this case, as well as numerous other cases in this district.
9. I am not aware of any individual with the actual name “Salt Marsh” that is associated with AF Holdings or John Steele.
10. However, upon information and belief, an individual named Tony or Anthony Saltmarsh does exist, and has documented associations with John Steele’s family and the mysterious Alan Cooper, as described further herein.
11. Upon information and belief, Tony Saltmarsh previously lived at 4532 E. Villa Theresa Drive in Phoenix Arizona, 85032. This belief is based upon a “past address” search through peoplesmart.com. of the address and Mr. Saltmarsh. A copy of Mr. Saltmarsh’s full report is annexed hereto as Exhibit B.
12. Upon information and belief, Jayme Steele also previously lived at 4532 E. Villa Theresa Drive in Phoenix, Arizona. This belief is likewise based on peoplesmart.com “past address” search for Ms. Steele. A copy of this report is annexed hereto as Exhibit C.
13. Upon information and belief, the 4532 E. Villa Theresa address was also previously used by VPR, Inc., a former Steele Hansmeier client. This belief is based on a review of the Nevada Secretary of State entity details attached hereto as Exhibit D.

14. Upon information and belief, Alan Cooper was identified as, inter alia, the President and Treasurer of VPR, Inc. and likewise associated with the 4532 East Villa Theresa address. This belief is likewise based on a review of the Nevada Secretary of State entity details, a copy of which are annexed hereto as Exhibit D.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this Declaration is executed on this 11th day of February, 2013, in Boulder Creek, California.

/s/ Nicholas R. Ranallo
Nicholas Ranallo

Exhibit A

1 U.S. 821, 831 (1994). And though this power must be exercised with restraint, the
2 Court has wide latitude in fashioning appropriate sanctions to fit the conduct. *See*
3 *Roadway Express, Inc. v. Piper*, 447 U.S. 752, 764–65 (1980).

4 **B. Rule 11(b)(3) Violations**

5 By presenting a pleading to the Court, an attorney certifies that—after
6 conducting a reasonable inquiry—the factual contentions in the pleading have
7 evidentiary support or, if specifically so identified, will likely have evidentiary
8 support after a reasonable opportunity for further investigation or discovery. Fed. R.
9 Civ. P. 11(b)(3). This precomplaint duty to find supporting facts is “not satisfied by
10 rumor or hunch.” *Bankers Trust Co. v. Old Republic Ins. Co.*, 959 F.2d 677, 683 (7th
11 Cir. 1992). The reasonableness of this inquiry is based on an objective standard, and
12 subjective good faith provides no safe harbor. *Golden Eagle Distrib. Corp. v.*
13 *Burroughs Corp.*, 801 F.2d 1531, 1538 (9th Cir. 1986); *F.D.I.C. v. Calhoun*, 34 F.3d
14 1291, 1296 (5th Cir. 1994); *Knipe v. Skinner*, 19 F.3d 72, 75 (2d Cir. 1994). The
15 Court wields the discretion to impose sanctions designed to “deter repetition of the
16 conduct or comparable conduct by others similarly situated.” Fed R. Civ. P 11(c)(4).

17 In *Ingenuity 13 LLC v. Doe*, No. 2:12-cv-6662-ODW(JCx) (C.D. Cal. filed
18 Aug. 2, 2012), the Court ordered Plaintiff on December 20, 2012, to show cause why
19 it failed to timely serve the Defendant or, if the Defendant has already been served, to
20 submit the proof of service. (ECF No. 12.) In response, Plaintiff noted that the delay
21 was because it waited to receive a response from the subscriber of the IP address
22 associated with the alleged act of infringement. (ECF No. 14.) Plaintiff further noted:
23 “Though the subscriber, David Wagar, remained silent, Plaintiff’s investigation of his
24 household established that Benjamin Wagar was the likely infringer of Plaintiff’s
25 copyright.” (ECF No. 14, at 2.) Based on this investigation, Plaintiff filed an
26 Amended Complaint, substituting Benjamin Wagar for John Doe. (ECF No. 13.)

27 Plaintiff’s Amended Complaint alleges the following in connection with
28 Benjamin Wagar:

- 1 • “Defendant Benjamin Wagar (‘Defendant’) knowingly and illegally
2 reproduced and distributed Plaintiff’s copyrighted Video by acting in
3 concert with others via the BitTorrent file sharing protocol and, upon
4 information and belief, continues to do the same.” (AC ¶ 1);
- 5 • “Defendant is an individual who, upon information and belief, is over the
6 age of eighteen and resides in this District.” (AC ¶ 4);
- 7 • “Defendant was assigned the Internet Protocol (‘IP’) address of
8 96.248.225.171 on 2012-06-28 at 07:19:47 (UTC).” (AC ¶ 4);
- 9 • “Defendant, using IP address 96.248.225.171, without Plaintiff’s
10 authorization or license, intentionally downloaded a torrent file particular
11 to Plaintiff’s Video, purposefully loaded that torrent file into his
12 BitTorrent client—in this case, Azureus 4.7.0.2—entered a BitTorrent
13 swarm particular to Plaintiff’s Video, and reproduced and distributed the
14 Video to numerous third parties.” (AC ¶ 22);
- 15 • “Plaintiff’s investigators detected Defendant’s illegal download on 2012-
16 06-28 at 07:19:47 (UTC). However, this is a [*sic*] simply a snapshot
17 observation of when the IP address was *observed* in the BitTorrent
18 swarm; the conduct took itself [*sic*] place before and after this date and
19 time.” (AC ¶ 23);
- 20 • “The unique hash value in this case is identified as
21 F016490BD8E60E184EC5B7052CEB1FA570A4AF11.” (AC ¶ 24.)

22 In a different case, *Ingenuity 13 LLC v. Doe*, No. 2:12-cv-6668-ODW(JCx)
23 (C.D. Cal. filed Aug. 2, 2012), Plaintiff essentially makes the same response to the
24 Court’s December 20, 2012 Order To Show Cause (ECF No. 12): “Though the
25 subscriber, Marvin Denton, remained silent, Plaintiff’s investigation of his household
26 established that Mayon Denton was the likely infringer of Plaintiff’s copyright.”
27 (ECF No. 13, at 2.) And based on this information, Plaintiff filed an Amended
28 Complaint (ECF No. 16), similar in all respects to the one filed against Benjamin

1 Wagar in *Ingenuity 13 LLC v. Doe*, No. 2:12-cv-6662-ODW(JCx) (C.D. Cal. filed
2 Aug. 2, 2012), with the following technical exceptions:

- 3 • “Defendant was assigned the Internet Protocol (‘IP’) address of 75.128.55.44
4 on 2012-07-04 at 07:51:30 (UTC).” (AC ¶ 4);
- 5 • “Defendant . . . purposefully loaded that torrent file into his BitTorrent
6 client—in this case, µTorrent 3.1.3” (AC ¶ 22);
- 7 • “The unique hash value in this case is identified as
8 0D47A7A035591B0BA4FA5CB86AFE986885F5E18E.” (AC ¶ 24.)

9 Upon review of these allegations, the Court finds two glaring problems that
10 Plaintiff’s technical cloak fails to mask. Both of these are obvious to an objective
11 observer having a working understanding of the underlying technology.

12 *1. Lack of reasonable investigation of copyright infringement activity*

13 The first problem is how Plaintiff concluded that the Defendants actually
14 downloaded the entire copyrighted video, when all Plaintiff has as evidence is a
15 “snapshot observation.” (AC ¶ 23.) This snapshot allegedly shows that the
16 Defendants were downloading the copyrighted work—at least at that moment in time.
17 But downloading a large file like a video takes time; and depending on a user’s
18 Internet-connection speed, it may take a long time. In fact, it may take so long that the
19 user may have terminated the download. The user may have also terminated the
20 download for other reasons. To allege copyright infringement based on an IP
21 snapshot is akin to alleging theft based on a single surveillance camera shot: a photo
22 of a child reaching for candy from a display does not automatically mean he stole it.
23 No Court would allow a lawsuit to be filed based on that amount of evidence.

24 What is more, downloading data via the Bittorrent protocol is not like stealing
25 candy. Stealing a piece of a chocolate bar, however small, is still theft; but copying an
26 encrypted, unusable piece of a video file via the Bittorrent protocol may not be
27 copyright infringement. In the former case, some chocolate was taken; in the latter
28 case, an encrypted, unusable chunk of zeroes and ones. And as part of its prima facie

1 copyright claim, Plaintiff must show that Defendants copied the copyrighted work.
2 *Feist Publ'ns, Inc. v. Rural Tel. Serv. Co.*, 499 U.S. 340, 361 (1991). If a download
3 was not completed, Plaintiff's lawsuit may be deemed frivolous.

4 In this case, Plaintiff's reliance on snapshot evidence to establish its copyright
5 infringement claims is misplaced. A reasonable investigation should include evidence
6 showing that Defendants downloaded the entire copyrighted work—or at least a
7 usable portion of a copyrighted work. Plaintiff has none of this—no evidence that
8 Defendants completed their download, and no evidence that what they downloaded is
9 a substantially similar copy of the copyrighted work. Thus, Plaintiff's attorney
10 violated Rule 11(b)(3) for filing a pleading that lacks factual foundation.

11 2. *Lack of reasonable investigation of actual infringer's identity*

12 The second problem is more troublesome. Here, Plaintiff concluded that
13 Benjamin Wagar is the person who illegally downloaded the copyrighted video. But
14 Plaintiff fails to allege facts in the Amended Complaint to show how Benjamin Wagar
15 is the infringer, other than noting his IP address, the name of his Bittorrent client, and
16 the alleged time of download.² Plaintiff's December 27, 2012 Response to the Court's
17 Order to Show Cause re Lack of Service sheds some light:

18 Though the subscriber, David Wagar, remained silent, Plaintiff's
19 investigation of his household established that Benjamin Wagar was the
20 likely infringer of Plaintiff's copyright. As such, Plaintiff mailed its
21 Amended Complaint to the Court naming Benjamin Wagar as the
22 Defendant in this action. (ECF No. 14, at 2.)

23 The disconnect is how Plaintiff arrived at this conclusion—that the actual infringer is
24 a member of the subscriber's household (and not the subscriber himself or anyone
25 else)—when all it had was an IP address, the name of the Bittorrent client used, the
26 alleged time of download, and an unresponsive subscriber.

27 ² This analysis similarly applies in *Ingenuity 13 LLC v. Doe*, No. 2:12-cv-6668-ODW(JCx) (C.D.
28 Cal. filed Aug. 2, 2012), where Plaintiff fails to allege sufficient facts to show how Mayon Denton is
the infringer.

1 Plaintiff's December 27, 2012 Discovery Status Report gives additional insight
2 into Plaintiff's deductive process:

3 In cases where the subscriber remains silent, Plaintiff conducts
4 investigations to determine the likelihood that the subscriber, or someone
5 in his or her household, was the actual infringer. . . . For example, if the
6 subscriber is 75 years old, or the subscriber is female, it is statistically
7 quite unlikely that the subscriber was the infringer. In such cases,
8 Plaintiff performs an investigation into the subscriber's household to
9 determine if there is a likely infringer of Plaintiff's copyright. . . .
Plaintiff bases its choices regarding whom to name as the infringer on
factual analysis. (ECF No. 15, at 24.)

10 The Court interprets this to mean: if the subscriber is 75 years old or female, then
11 Plaintiff looks to see if there is a pubescent male in the house; and if so, he is named
12 as the defendant. Plaintiff's "factual analysis" cannot be characterized as anything
13 more than a hunch.

14 Other than invoking undocumented statistics, Plaintiff provides nothing to
15 indicate that Benjamin Wagar is the infringer. While it is plausible that Benjamin
16 Wagar is the infringer, Plaintiff's deduction falls short of the reasonableness standard
17 required by Rule 11.

18 For instance, Plaintiff cannot show that Benjamin is the infringer instead of
19 someone else, such as: David Wagar; other members of the household; family guests;
20 or, the next door neighbor who may be leeching from the Wagar's Internet access.
21 Thus, Plaintiff acted recklessly by naming Benjamin Wagar as the infringer based on
22 its haphazard and incomplete investigation.

23 Further, the Court is not convinced that there is no solution to the problem of
24 identifying the actual infringer. Here, since Plaintiff has the identity of the subscriber,
25 Plaintiff can find the subscriber's home address and determine (by driving up and
26 scanning the airwaves) whether the subscriber, (1) has Wi-Fi, and (2) has password-
27 protected his Wi-Fi access, thereby reducing the likelihood that an unauthorized user
28 outside the subscriber's home is the infringer. In addition, since Plaintiff is tracking a

1 number of related copyrighted videos, Plaintiff can compile its tracking data to
2 determine whether other copyrighted videos were downloaded under the same IP
3 address. This may suggest that the infringer is likely a resident of the subscriber's
4 home and not a guest. And an old-fashioned stakeout may be in order: the presence of
5 persons within the subscriber's home may be correlated with tracking data—the
6 determination of who would have been in the subscriber's home when the download
7 was initiated may assist in discovering the actual infringer.

8 Such an investigation may not be perfect, but it narrows down the possible
9 infringers and is better than the Plaintiff's current investigation, which the Court finds
10 involves nothing more than blindly picking a male resident from a subscriber's home.
11 But this type of investigation requires time and effort, something that would destroy
12 Plaintiff's business model.

13 The Court has previously expressed concern that in pornographic copyright
14 infringement lawsuits like these, the economics of the situation makes it highly likely
15 for the accused to immediately pay a settlement demand. Even for the innocent, a
16 four-digit settlement makes economic sense over fighting the lawsuit in court—not to
17 mention the benefits of preventing public disclosure (by being named in a lawsuit) of
18 allegedly downloading pornographic videos.

19 And copyright lawsuits brought by private parties for damages are different
20 than criminal investigations of cybercrimes, which sometimes require identification of
21 an individual through an IP address. In these criminal investigations, a court has some
22 guarantee from law enforcement that they will bring a case only when they actually
23 have a case and have confidently identified a suspect. In civil lawsuits, no such
24 guarantees are given. So, when viewed with a court's duty to serve the public interest,
25 a plaintiff cannot be given free rein to sue anyone they wish—the plaintiff has to
26 actually show facts supporting its allegations.

27 ///

28 ///

1 **C. Local Rule 83-3 Violations**

2 Under Local Rule 83-3, the Court possesses the power to sanction attorney
3 misconduct, including: disposing of the matter; referring the matter to the Standing
4 Committee on Discipline; or taking “any action the Court deems appropriate.”
5 L.R. 83-3.1. This includes the power to fine and imprison for contempt of the Court’s
6 authority, for: (1) misbehavior of any person in its presence or so near thereto as to
7 obstruct the administration of justice; (2) misbehavior of any of its officers in their
8 official transactions; or, (3) disobedience or resistance to its lawful writ, process,
9 order, rule, decree, or command. 18 U.S.C. § 401.

10 The Court is concerned with three instances of attorney misconduct. The first
11 and second instances are related and concern violating the Court’s discovery order.
12 The third instance concerns possible fraud upon the Court.

13 *1. Failure to comply with the Court’s discovery order*

14 In *AF Holdings LLC v. Doe*, No. 2:12-cv-6636-ODW(JCx) (C.D. Cal. filed
15 Aug. 1, 2012) and *AF Holdings LLC v. Doe*, No. 2:12-cv-6669-ODW(JCx) (C.D. Cal.
16 filed Aug. 2, 2012), the Court ordered Plaintiff to “cease its discovery efforts relating
17 to or based on information obtained through any abovementioned Rule 45
18 subpoenas.” (ECF No. 13, at 1; ECF No. 10, at 1.) Further, Plaintiff was required to
19 name all persons that were identified through any Rule 45 subpoenas. (*Id.*)

20 Plaintiff responded on November 1, 2012, and indicated that it did not obtain
21 any information about the subscribers in both of these cases. (ECF No. 10, at 6–7,
22 10.)³ But in response to the Court’s subsequent Orders to Show Cause, Plaintiff not
23 only named the subscribers, but recounted its efforts to contact the subscriber and find
24 additional information. (ECF No. 15; ECF No. 18.)

25 This conduct contravenes the Court’s order to cease discovery. Plaintiff has
26 provided no justification why it ignored the Court’s order.

27 _____
28 ³ This response was filed in *AF Holdings LLC v. Doe*, No. 2:12-cv-5709-ODW(JCx) (C.D. Cal. filed
July 2, 2012).

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2. *Fraud on the Court*

Upon review of papers filed by attorney Morgan E. Pietz, the Court perceives that Plaintiff may have defrauded the Court. (ECF No. 23.)⁴ At the center of this issue is the identity of a person named Alan Cooper and the validity of the underlying copyright assignments.⁵ If it is true that Alan Cooper’s identity was misappropriated and the underlying copyright assignments were improperly executed using his identity, then Plaintiff faces a few problems.

First, with an invalid assignment, Plaintiff has no standing in these cases. Second, by bringing these cases, Plaintiff’s conduct can be considered vexatious, as these cases were filed for a facially improper purpose. And third, the Court will not idle while Plaintiff defrauds this institution.

D. Conclusion

Accordingly, the Court hereby **ORDERS** Brett L. Gibbs, **TO SHOW CAUSE** why he should not be sanctioned for the following:

- In *AF Holdings LLC v. Doe*, No. 2:12-cv-6636-ODW(JCx) (C.D. Cal. filed Aug. 1, 2012), violating the Court’s October 19, 2012 Order instructing AF Holdings to cease its discovery efforts based on information obtained through any earlier-issued subpoenas;
- In *AF Holdings LLC v. Doe*, No. 2:12-cv-6669-ODW(JCx) (C.D. Cal. filed Aug. 2, 2012), violating the Court’s October 19, 2012 Order instructing AF Holdings to cease its discovery efforts based on information obtained through any earlier-issued subpoenas;

///

⁴ Although the papers revealing this possible fraud were filed in *Ingenuity 13 LLC v. Doe*, No. 2:12-cv-8333-ODW(JCx) (C.D. Cal. filed Sept. 27, 2012), this fraud, if true, was likely committed by Plaintiff in each of its cases before this Court.

⁵ For example, in *AF Holdings LLC v. Doe*, No. 2:12-cv-6669-ODW(JCx) (C.D. Cal. filed Aug. 2, 2012), Plaintiff filed a copyright assignment signed by Alan Cooper on behalf of Plaintiffs. (ECF No. 16-1.)

- 1 • In *Ingenuity 13 LLC v. Doe*, No. 2:12-cv-6662-ODW(JCx) (C.D. Cal.
2 filed Aug. 2, 2012), violating Rule 11(b)(2) by:
 - 3 ○ alleging copyright infringement based on a snapshot of Internet
4 activity, without conducting a reasonable inquiry; or,
 - 5 ○ alleging that Benjamin Wagar is the infringer, without conducting
6 a reasonable inquiry;
- 7 • In *Ingenuity 13 LLC v. Doe*, No. 2:12-cv-6668-ODW(JCx) (C.D. Cal.
8 filed Aug. 2, 2012), violating Rule 11(b)(2) by:
 - 9 ○ alleging copyright infringement based on a snapshot of Internet
10 activity, without conducting a reasonable inquiry; or,
 - 11 ○ alleging that Mayon Denton is the infringer, without conducting a
12 reasonable inquiry;
- 13 • In *Ingenuity 13 LLC v. Doe*, No. 2:12-cv-8333-ODW(JCx) (C.D. Cal.
14 filed Sept. 27, 2012), perpetrating fraud on the Court by
15 misappropriating the identity of Alan Cooper and filing lawsuits based
16 on an invalid copyright assignment.

17 This order to show cause is scheduled for hearing on March 11, 2013, at 1:30
18 p.m., to provide Mr. Gibbs the opportunity to justify his conduct. Based on the
19 unusual circumstances of this case, the Court invites Morgan E. Pietz to present
20 evidence concerning the conduct outlined in this order. The Court declines to sanction
21 Plaintiffs AF Holdings LLC and Ingenuity 13 LLC at this time for two reasons:
22 (1) Mr. Gibbs appears to be closely related to or have a fiduciary interest in Plaintiffs;
23 and; (2) it is likely Plaintiffs are devoid of assets.

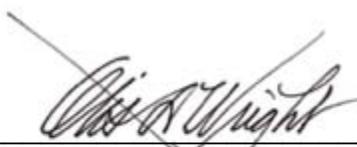
24 If Mr. Gibbs or Mr. Pietz so desire, they each may file by February 19, 2013, a
25 brief discussing this matter. The Court will also welcome the appearance of Alan
26 Cooper—to either confirm or refute the fraud allegations.

27 Based on the evidence presented at the March 11, 2013 hearing, the Court will
28 consider whether sanctions are appropriate, and if so, determine the proper

1 punishment. This may include a monetary fine, incarceration, or other sanctions
2 sufficient to deter future misconduct. Failure by Mr. Gibbs to appear will result in the
3 automatic imposition of sanctions along with the immediate issuance of a bench
4 warrant for contempt.

5 **IT IS SO ORDERED.**

6 February 7, 2012



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8 **OTIS D. WRIGHT, II**
9 **UNITED STATES DISTRICT JUDGE**

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Exhibit B

Contact Report

Tony Saltmarsh

Report Expiration
July 30, 2013

Name Tony Saltmarsh

Age 28

Date of Birth 1/17/1985

Phone Number N/A

Additional Phone Numbers 603-224-4510, 601-848-5514

Numbers

Most Recent Address 314 W Monte Cristo Ave, Phoenix, AZ 85023-7420

Aliases/Name Variations Anthony J Saltmarsh

Variations

Email:

b****@comcast.net	Tony Saltmarsh 122 Bow Bog Road Bow, NH 03304
b****@attbi.com	Tony Saltmarsh 122 Bow Bog Road Bow, NH 03304
b****@aol.com	Tony Saltmarsh 122 Bow Bog Road Bow, NH 03304
b****@attbi.com	Tony Saltmarsh 122 Bow Bog Road Bow, NH 03304
b****@attbi.com	Tony Saltmarsh 122 Bow Bog Road Bow, NH 03304 601-848-5514
b****@comcast.net	Tony Saltmarsh 122 Bow Bog Rd Bow, NH 03304-3902
b****@attb1.com	Tony Saltmarsh 122 Bow Bog Rd Bow, NH 03304-3902
b****@geocities.com	Tony Saltmarsh 122 Bow Bog Rd Bow, NH 03304-3902
t****@msn.com	Tony Saltmarsh 122 Bow Bog Rd Bow, NH 03304-3902

4 addresses were found

Address	City, State, Zip	Phone	Added	Updated
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314 W Monte Cristo Ave	Phoenix, AZ 85023-7420		7/2011	7/2011
4532 E Villa Theresa Dr	Phoenix, AZ 85032-1554		4/2009	4/2009
17212 N Scottsdale Rd, Apt 2312	Scottsdale, AZ 85255-9615		2/2007	9/2007
122 Bow Bog Rd	Bow, NH 03304-3902	603-224-4510		2007

Possible Relatives

Possible relatives are people who are likely relatives of Tony Saltmarsh based on matching surname and shared addresses. Please note that this will not include all relatives.

5 possible relatives were found

- Aaron A Saltmarsh**
- Alexander W Saltmarsh**
- Brandy Eileen Saltmarsh**
- Davis**
- Stephanie L Edwards**

Name	Age	Address
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Exhibit C

Contact Report

Jayne C Steele

Report Expiration
July 30, 2013

Name Jayme C Steele
Age 35
Date of Birth 3/30/1977
Phone Number 320-592-0011
Additional Phone Numbers 702-223-5209, 952-903-5343
Most Recent Address 314 W Monte Cristo Ave, Phoenix, AZ 85023-7420
Aliases/Name Variations Jamey Steele

14 addresses were found

<i>Address Added</i>	<i>Updated</i>	<i>City, State, Zip</i>	<i>Phone</i>
314 W Monte Cristo Ave 7/2011	7/2011	Phoenix, AZ 85023-7420	
21251 220th St 6/2005	11/2006	Mc Grath, MN 56350-4117	320-592-0011
3743 Irvington Ave 2/2000	12/2005	Miami, FL 33133-6105	
7641 128th St W	12/1995	Saint Paul, MN 55124-9767	
21468 E Bonanza Way		Queen Creek, AZ 85142-3291	
21067 220th St		Mc Grath, MN 56350-4019	320-592-0011
4532 E Villa Theresa Dr		Phoenix, AZ 85032-1554	

4404 Sandhorse Ct Las Vegas, NV 89130-5212 702-223-5209

222 Zamora Ave, Apt 7 Coral Gables, FL 33134-3930

7511 Bristol Village Dr Minneapolis, MN 55438-2562 952-903-5343

3160 Florida Ave Miami, FL 33133-5113

824 Jefferson Ave Miami Beach, FL 33139-5632

5533 Lagorce Dr Miami Beach, FL 33140-2137

Possible Relatives

Possible relatives are people who are likely relatives of Jayme C Steele based on matching surname and shared addresses. Please note that this will not include all relatives.

4 possible relatives were found

Deborah A Steele
Elizabeth N Steele
John Lawrence Steele Jr
John L J Steel

Name	Age	Address
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Exhibit D

VPR INC.**Business Entity Information**

Status:	Default	File Date:	11/9/2010
Type:	Domestic Corporation	Entity Number:	E0540532010-2
Qualifying State:	NV	List of Officers Due:	11/30/2012
Managed By:		Expiration Date:	
NV Business ID:	NV20101804310	Business License Exp:	11/30/2012

Registered Agent Information

Name:	SPIEGEL & UTRERA, P.A.	Address 1:	1785 EAST SAHARA AVENUE, SUITE 490
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89104
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	
Mailing Zip Code:			
Agent Type:	Noncommercial Registered Agent		

Financial Information

No Par Share Count:	0	Capital Amount:	\$ 75,000.00
Par Share Count:	75,000.00	Par Share Value:	\$ 1.00

Officers Include Inactive Officers

President - ALAN COOPER			
Address 1:	4532 EAST VILLA THERESA DR	Address 2:	
City:	PHOENIX	State:	AZ
Zip Code:	85032	Country:	
Status:	Active	Email:	
Secretary - ALAN COOPER			
Address 1:	4532 EAST VILLA THERESA DR	Address 2:	
City:	PHOENIX	State:	AZ
Zip Code:	85032	Country:	
Status:	Active	Email:	

Treasurer - ALAN COOPER			
Address 1:	4532 EAST VILLA THERESA DR	Address 2:	
City:	PHOENIX	State:	AZ
Zip Code:	85032	Country:	
Status:	Active	Email:	
Director - ALAN COOPER			
Address 1:	4532 EAST VILLA THERESA DR	Address 2:	
City:	PHOENIX	State:	AZ
Zip Code:	85032	Country:	
Status:	Active	Email:	

Actions\Amendments

Action Type:	Articles of Incorporation		
Document Number:	20100841806-90	# of Pages:	4
File Date:	11/9/2010	Effective Date:	
Initial Stock Value: Par Value Shares: 75,000 Value: \$ 1.00 No Par Value Shares: 0 ----- ----- Total Authorized Capital: \$ 75,000.00			
Action Type:	Initial List		
Document Number:	20100868226-35	# of Pages:	1
File Date:	11/17/2010	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20120252442-44	# of Pages:	1
File Date:	4/10/2012	Effective Date:	
(No notes for this action)			

EXHIBIT T

Search Domain or keyword

GO | Login

AdChoices

Domain Names Web Hosting Email Hosting Website Tools Domain Tools

Copyright POLO DOMAINS 2011.

Privacy Statement | Terms | Limits | Domain Generator | Domain Reseller | Cheap Domains



Webs are n free Califo busine



Free website domain nar hosting for c

NOTISSUES.COM : [issues](#) (en) [no](#) (en)



Share Your Experience. Leave a comment about this Website

Nameserver Histroy

DB: 53 : Wednesday 30 March 2011 (Old Record)

[NS63.DOMAINCONTROL.COM](#) (972893)

[NS64.DOMAINCONTROL.COM](#) (970180)

DB: 94 : Thursday 7 June 2012 >>> **NOW**

No records for this period

Domain may have expired or is not assigned nameservers

DNS record history

No DNS record data yet, this domain has been queued for checking (Should be an hour or so)

Whois on 17-April-2011

[Refresh Data](#)



[\\$0.99 Domains at Go Daddy](#)

[GoDaddy.com](#)

Why Pay More? Compare Us! Free Hosting w/Site Builder & More.



Whois Server Version 2.0

--SI-VSCompRegistrars--

Domain Name: NOTISSUES.COM
Registrar: [godaddy.com, inc.](#)
Whois Server: whois.godaddy.com
Referral URL: http://registrar.godaddy.com
Name Server: NS63.DOMAINCONTROL.COM
Name Server: NS64.DOMAINCONTROL.COM
Status: clientDeleteProhibited
Status: clientRenewProhibited
Status: clientTransferProhibited
Status: clientUpdateProhibited
Updated Date: 24-mar-2011
Creation Date: 24-mar-2011
Expiration Date: 24-mar-2012

AdChoices

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>>> Last update of whois database: Sat, 16 Apr 2011 22:43:37 UTC <<<

--SI-VSNotice---

--SI-VSTerms---

--SI-GDDDisclaimer---

--SI-GDDnotRegistrant---

Registrant:
  Alan Cooper
  4532 E Villa Theresa Dr.
  Phoenix, Arizona 85032
  United States

Registered through: godaddy.com, inc. (http://www.godaddy.com)
Domain Name: NOTISSUES.COM
Created on: 24-Mar-11
Expires on: 24-Mar-12
Last Updated on: 24-Mar-11

Administrative Contact:
  Cooper, Alan 
  4532 E Villa Theresa Dr.
  Phoenix, Arizona 85032
  United States
  4806489301    Fax --

Technical Contact:
  Cooper, Alan 
  4532 E Villa Theresa Dr.
  Phoenix, Arizona 85032
  United States
  4806489301    Fax --

Domain servers in listed order:
  NS63.DOMAINCONTROL.COM
  NS64.DOMAINCONTROL.COM

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Commenter's name
(Your Name)

Comment Subject

Comment Body

Submit

No comments yet.

EXHIBIT U

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
ST. CLAIR COUNTY, ILLINOIS
LAW DIVISION

GUAVA LLC,
Petitioner,
v.
COMCAST CABLE COMMUNICATIONS, LLC,
Respondent.

No. 12MR 417

FILED
ST. CLAIR COUNTY
NOV 20 2012
Kathleen A. Dea
CLERK

**PETITION FOR DISCOVERY BEFORE SUIT TO IDENTIFY RESPONSIBLE
PERSONS AND ENTITIES**

1. Petitioner, Guava LLC, through its undersigned attorney, hereby petitions this Court for entry of an Order requiring Comcast Cable Communications LLC ("Comcast") to provide the identifying information of the subscribers associated with the Internet Protocol ("IP") addresses listed on Exhibit A attached hereto, and in support thereof, states as follows:

NATURE OF THE ACTION

2. Petitioner brings this petition pursuant to Illinois Supreme Court Rule 224 to identify unidentified John Does ("Does") so that Petitioner may file an action for computer fraud and abuse and computer tampering against them.

THE PARTIES

3. Petitioner is a limited liability company that operates protected computer systems, including computer systems accessible in St. Clair County, Illinois.

4. Respondent Comcast Cable Communications, LLC ("Comcast") is an Internet Service Provider ("ISP") that provides Internet services to the Does that Petitioner seeks to identify. Does are known to Petitioner solely by an Internet Protocol ("IP") address given to

Does by Comcast. An IP address is a unique number that is assigned to Internet users by an ISP at a given date and time.

5. Comcast records the time and date that it assigns an IP address to a subscriber and maintains in logs for a period of time a record of the assignment. Comcast also maintain records which typically include the name, one or more addresses, one or more telephone numbers, and one or more e-mail addresses of the subscriber. However, these records are not public and are not available to Petitioner at this time. Comcast is the only entity that can link the Does' IP address to the Does' true identity.

JURISDICTION AND VENUE

6. Pursuant to 134 Ill. 2d R. 224 “[t]he action for discovery shall be initiated by the filing of a verified petition in the circuit court of the county in which the action or proceeding might be brought or in which one or more of the persons or entities from whom discovery is sought resides.” Venue is proper because at least one of the Doe Defendants resides in St. Clair County, Illinois. Further, Comcast transacts business in St. Clair County, Illinois.

7. This Court has subject matter jurisdiction over this matter because a petition for pre-suit discovery falls within the exclusive original jurisdiction of the Circuit Court. Ill. Const., Art. VI, § 9; 134 Ill. 2d R. 224; *see also Shutes v. Fowler*, 584 N.E.2d 920, 923 (Ill. App. Ct. 1991) (“Rule 224 is constitutional and confers subject-matter jurisdiction on the circuit court.”)

BACKGROUND

8. Hacking has become a serious threat to anyone maintaining private or protected computer systems. *See* Michael Mimoso, *Cybercrime Gang Recruiting Botmasters for Large-Scale MiTM Attacks on American Banks*, THE THREAT POST, Oct. 4, 2012, attached hereto as Exhibit B (explaining that “[a]s many as 30 banks have been targeted” recently by cyber

hackers.); Bryon Acohido, *No Slowdown in Sight for Cyberattacks*, USA TODAY, July 30, 2012, attached hereto as Exhibit C (Eddie Schwartz, chief security officer of security firm RSA stating that “[i]t’s easier and safer for a criminal to steal money from an online bank account, rather than have to walk into a bank — or to steal intellectual property in an online setting, rather than have to send in a human spy.”).

9. Even large corporations and governmental agencies are not immune from hacking attacks. See Kim Zetter, *Hackers Release 1 Million Apple Device IDs Allegedly Stolen From FBI Laptop*, WIRED, Sept. 4, 2012, attached hereto as Exhibit D (explaining that a hacker group obtained “[i] million Apple device IDs that” were “obtained from an FBI computer they hacked.”).

10. Companies harmed by hacking are encouraged to seek relief in the courts. See Glenn Chapman, *Cyber Defenders Urges to go on the Offense*, AMERICAN FREE PRESS, July 26, 2012, attached hereto as Exhibit E (former FBI cyber crime unit chief Shawn Henry explaining that “I believe the threat from computer network attack is the most significant threat we face as a civilized world, other than a weapon of mass destruction.” and Black Hat founder Jeff Moss proposing that “cyber attackers also be fought on legal fronts, with companies taking suspected culprits to court.”).

FACTUAL ALLEGATIONS

A. Computer Fraud And Abuse

11. Plaintiff owns and operates computer systems that distribute third-party adult entertainment content. By way of analogy, Plaintiff is like a satellite radio station in that it distributes content owned by others. Plaintiff generates revenue by requiring third-parties to pay

a fee for accessing its distributions systems. Members are assigned a username and password in order to access the distribution system.

12. The Does obtained usernames and passwords from a website that allows its members to trade stolen usernames and passwords amongst one another. The Does used the stolen usernames and passwords to gain unauthorized access to Plaintiff's protected computer systems. Once they gained unauthorized access to Plaintiff's protected computer systems, they permitted others to do the same.

13. The Does were able to access Plaintiff's computer systems as though they were paying members. The Does became privy to private information, including information regarding the identities of Plaintiff's customers, account information, financial information, computer programming and security information, and other information that Plaintiff protects and does not even give access to third parties, even those who pay for and obtain legitimate passwords to access Plaintiff's websites.

14. Since Does accessed the website through a hacked password, they are not required to provide any identifying personal information, such as their true names, addresses, telephone numbers or email addresses. Does can only be identified by their IP addresses.

15. Petitioner identified the IP addresses associated with the hackers through computer software that allowed Petitioner to detect the unauthorized breaches of its computer systems. The computer software detected the hacking, unauthorized access, and password sharing activity on Petitioner's computer systems. The individuals committing these unlawful activities are identified by their IP addresses as well as the dates and times they unlawfully accessed Petitioner's computer systems. This information is set forth in Exhibit A.

16. Once the IP address and date and time of unlawful access were ascertained, Petitioner used publicly available reverse-lookup databases on the Internet to determine what ISP issued the IP address. The Does Petitioner seeks to identify through this petition are all subscribers of Comcast.

17. Petitioner has suffered a loss due to the Does fraud and abuse of Petitioner's computer systems in excess of \$250,000. Petitioner has suffered a loss in the form of 1) costs associated with detecting the unauthorized breaches and identifying the IP addresses of those associated, 2) costs associated with restoring its computer systems to their condition prior to the breach of its computer systems and preventing future breaches, and 3) lost revenue and costs incurred due to interruption of service.

18. The above alleged facts support a claim of computer fraud and abuse by Petitioner against the Does under 18 U.S.C. § 1030.¹

B. Computer Tampering

19. The allegations contained in the preceding paragraphs are hereby re-alleged as if fully set forth herein.

20. The Does knowingly, and without the authorization of Petitioner, accessed Petitioner's computer systems.

21. Once the Does gained unauthorized access, they knowingly, and without the authorization of Petitioner, obtained data and services as though they were paying members.

22. Petitioner has suffered a loss due to the Does unauthorized tampering of Petitioner's computer systems in excess of \$250,000. Petitioner has suffered a loss in the form of 1) costs associated with detecting the unauthorized breaches and identifying the IP addresses of

¹ A private right of action exists under the Act under 18 U.S.C. § 1030(g).

29. Petitioner has a right to the relief sought in order to identify the unknown Does, which is a condition precedent to Petitioner filing an action against the Does, who will be defendants.

30. The discovery sought is material to Petitioner's anticipated actions at law.

WHEREFORE, Petitioner respectfully requests that the Court enter a judgment:

(A) Entering an Order requiring Comcast to turn over the following identifying information of the subscribers associated with the IP addresses listed on Exhibit A, attached hereto:

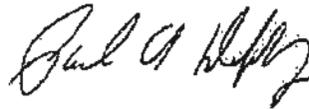
- True Name;
- Address;
- Telephone Number;
- E-mail Address; and
- Media Access Control Address.

(B) Granting Petitioner further relief as this Court deems just and proper.

Respectfully submitted,

GUAVA LLC

DATED: November 16, 2012

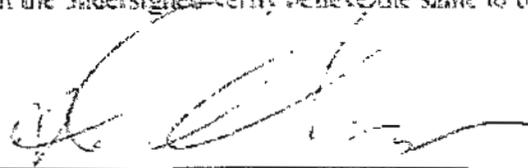


By:

Paul A. Duffy, Esq. (Bar No. 6210496)
2 N. LaSalle Street
13th Floor
Chicago, IL 60602
312-952-6136
Attorney for Petitioner

VERIFICATION

Under penalties of perjury as provided by law pursuant to section 1-109 of the code of civil procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters herein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that the undersigned verily believe the same to be true.


Alan Moony - Declarant

SUBSCRIBED and SWORN TO

Before Me This 30th day of November, 2012.

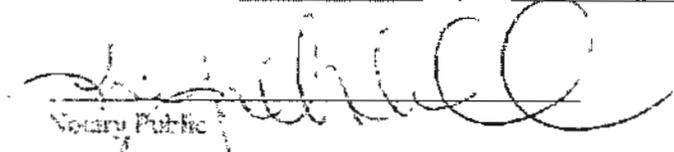

Notary Public

EXHIBIT A

IP Address	Date/Time (UTC)
173.9.253.149	2012-10-05 01:12:01
23.25.47.84	2012-11-15 13:58:19
24.1.107.63	2012-08-10 21:11:53
24.1.141.155	2012-10-15 21:51:01
24.1.175.233	2012-10-08 04:06:10
24.1.191.211	2012-10-10 20:19:24
24.1.75.199	2012-11-15 09:33:40
24.1.95.156	2012-10-11 23:25:46
24.1.98.146	2012-08-03 05:28:23
24.12.113.158	2012-08-14 02:10:08
24.12.116.87	2012-10-11 19:14:53
24.12.160.43	2012-11-05 02:35:08
24.12.160.5	2012-11-12 22:09:42
24.12.17.76	2012-08-16 17:12:21
24.12.215.82	2012-11-06 15:25:41
24.12.235.189	2012-10-29 22:09:33
24.12.255.78	2012-11-01 04:26:30
24.12.30.72	2012-10-03 13:21:19
24.12.9.239	2012-08-06 23:35:11
24.13.103.83	2012-10-26 22:00:56
24.13.118.250	2012-10-10 22:09:37
24.13.137.179	2012-11-15 09:25:17
24.13.161.156	2012-10-25 12:50:30
24.13.172.38	2012-11-01 21:27:57
24.13.178.197	2012-10-01 00:32:51
24.13.187.100	2012-08-11 01:23:45
24.13.235.108	2012-08-14 18:29:03
24.13.59.132	2012-09-15 10:35:30
24.14.103.125	2012-09-18 15:50:10
24.14.116.211	2012-09-13 17:10:10
24.14.122.52	2012-08-09 14:14:22
24.14.13.193	2012-10-10 13:23:41
24.14.130.85	2012-10-06 16:43:11
24.14.162.27	2012-08-20 23:02:49
24.14.168.183	2012-09-29 13:46:42
24.14.175.98	2012-10-18 21:42:55
24.14.188.2	2012-10-31 22:18:00
24.14.191.2	2012-10-30 03:48:51
24.14.191.209	2012-10-25 18:28:44
24.14.211.234	2012-10-10 21:26:49
24.14.22.26	2012-09-15 20:12:28
24.14.226.226	2012-10-03 04:24:19
24.14.50.22	2012-09-13 23:57:01
24.15.0.234	2012-11-09 17:41:30
24.15.108.237	2012-11-04 07:50:59
24.15.188.130	2012-10-29 20:50:23

24.15.194.37	2012-11-09 01:53:56
24.15.21.54	2012-10-09 16:48:00
24.15.225.33	2012-11-08 05:47:49
24.15.29.44	2012-11-12 20:33:39
24.15.48.154	2012-11-06 01:50:48
24.15.94.96	2012-10-15 07:11:54
24.63.77.213	2012-10-01 17:55:01
24.7.197.117	2012-09-30 05:49:20
24.7.199.112	2012-09-16 19:54:04
24.7.214.221	2012-11-02 16:43:02
50.129.14.36	2012-10-16 20:32:04
50.129.252.207	2012-09-28 01:28:10
50.129.68.62	2012-09-29 13:00:56
50.129.69.141	2012-10-19 11:33:31
50.129.92.32	2012-10-24 20:34:18
50.140.131.57	2012-10-06 19:29:04
50.140.165.240	2012-09-21 01:02:25
50.140.169.244	2012-09-23 13:48:02
50.140.178.114	2012-10-05 03:32:14
50.141.173.240	2012-09-30 18:56:59
50.141.215.254	2012-09-30 00:45:57
50.141.247.73	2012-10-05 03:51:20
50.141.254.153	2012-11-09 02:38:17
50.77.161.249	2012-10-03 20:15:25
67.162.108.239	2012-10-09 12:08:40
67.162.29.173	2012-09-26 02:13:33
67.162.29.246	2012-10-08 23:51:27
67.162.38.22	2012-10-08 01:06:19
67.162.39.33	2012-09-27 13:25:24
67.162.47.179	2012-08-20 18:58:39
67.162.51.34	2012-08-10 03:26:21
67.162.81.65	2012-10-30 14:04:44
67.163.4.99	2012-09-26 04:31:30
67.163.69.45	2012-10-03 10:46:07
67.163.76.75	2012-08-01 06:48:44
67.163.89.166	2012-09-27 01:01:52
67.163.9.43	2012-11-04 11:15:13
67.165.167.146	2012-10-16 00:51:08
67.165.178.74	2012-10-27 02:43:29
67.165.179.58	2012-08-01 16:00:53
67.165.182.136	2012-10-06 17:09:50
67.165.183.182	2012-09-29 07:28:18
67.167.112.222	2012-10-24 21:51:26
67.167.13.9	2012-10-22 16:02:08
67.167.13.99	2012-09-29 06:57:11
67.167.18.189	2012-11-10 00:01:59
67.167.210.178	2012-11-15 06:40:40

67.167.246.116	2012-10-24 08:07:08
67.173.104.228	2012-10-10 05:53:29
67.173.113.134	2012-11-12 15:13:13
67.173.142.217	2012-10-09 00:52:13
67.173.41.116	2012-09-25 14:53:13
67.173.67.242	2012-10-13 21:41:46
67.173.71.42	2012-09-13 04:21:13
67.173.81.33	2012-10-08 14:16:06
67.173.94.229	2012-08-16 01:30:21
67.174.12.22	2012-08-08 17:41:23
67.174.24.44	2012-10-26 13:22:10
67.174.3.197	2012-09-23 02:06:36
67.174.7.214	2012-08-08 15:14:57
67.175.164.253	2012-10-10 23:57:29
67.175.167.179	2012-10-31 02:41:14
67.175.201.238	2012-11-09 17:08:21
67.175.219.14	2012-11-15 02:16:55
67.175.225.135	2012-10-17 07:27:02
67.175.34.7	2012-11-01 16:02:32
67.175.45.113	2012-09-22 20:19:53
67.175.62.183	2012-11-12 17:17:26
67.175.64.86	2012-10-23 16:29:14
67.175.7.224	2012-11-07 07:46:26
67.176.150.212	2012-09-24 03:23:17
67.176.153.52	2012-11-09 18:34:34
67.176.182.107	2012-10-28 20:20:16
67.184.1.244	2012-11-08 22:58:08
67.184.166.20	2012-08-10 23:48:18
67.184.177.95	2012-11-12 15:21:08
67.184.228.60	2012-09-21 04:12:43
67.184.24.103	2012-11-10 04:21:16
67.184.86.237	2012-11-04 02:24:27
67.186.127.41	2012-11-15 02:16:52
67.186.83.184	2012-10-05 17:56:05
67.186.86.5	2012-10-19 19:12:46
67.186.92.192	2012-11-12 22:33:48
68.51.99.159	2012-09-23 01:22:07
68.57.197.175	2012-10-18 04:18:36
68.57.219.140	2012-08-18 17:37:38
68.57.231.126	2012-10-07 11:33:01
68.57.233.25	2012-10-14 05:51:31
68.58.155.157	2012-10-29 22:23:38
68.58.68.84	2012-08-18 21:48:40
69.136.14.225	2012-11-12 15:47:21
69.136.9.65	2012-10-24 07:20:53
69.245.251.141	2012-10-27 04:19:52
69.246.215.8	2012-10-30 21:55:53

69.246.223.186	2012-11-05 04:52:55
71.194.120.21	2012-10-21 20:48:17
71.194.120.232	2012-09-16 16:34:15
71.194.185.170	2012-09-15 16:52:26
71.194.189.101	2012-11-10 00:36:23
71.194.248.8	2012-10-22 09:13:14
71.194.47.68	2012-09-28 02:50:38
71.194.6.203	2012-08-27 16:48:55
71.194.75.167	2012-11-05 01:09:28
71.194.76.21	2012-08-05 20:56:20
71.194.86.35	2012-10-01 17:33:32
71.201.196.162	2012-08-02 05:41:49
71.201.20.218	2012-10-16 08:51:40
71.201.200.210	2012-10-05 03:15:45
71.201.225.111	2012-09-24 03:38:27
71.201.240.10	2012-10-13 15:30:35
71.201.48.224	2012-08-05 04:48:50
71.201.53.217	2012-10-19 01:41:29
71.201.68.61	2012-11-08 14:55:02
71.228.2.201	2012-08-09 15:27:28
71.228.2.27	2012-11-06 21:05:50
71.228.23.118	2012-08-13 23:57:58
71.228.23.45	2012-08-15 20:52:23
71.229.73.180	2012-09-17 04:52:21
71.229.75.58	2012-08-28 16:18:05
71.239.129.20	2012-08-09 15:50:26
71.239.186.221	2012-08-14 16:30:32
71.239.187.67	2012-10-03 22:10:53
71.239.253.249	2012-09-19 06:31:04
71.239.27.180	2012-11-06 19:47:59
71.239.43.67	2012-11-10 07:08:51
71.239.44.253	2012-10-02 03:15:55
71.239.55.92	2012-11-10 08:21:48
71.239.61.141	2012-09-13 17:28:55
71.239.90.45	2012-09-29 20:11:30
71.57.3.17	2012-09-30 00:57:42
71.57.33.24	2012-10-21 15:16:46
71.57.44.80	2012-08-04 04:01:00
71.57.63.157	2012-08-20 01:27:27
71.57.92.76	2012-10-07 21:38:42
75.150.227.205	2012-10-23 15:58:01
76.16.1.11	2012-10-04 01:11:17
76.16.189.233	2012-11-09 18:53:22
76.16.213.19	2012-08-14 04:18:29
76.16.243.52	2012-10-24 12:58:31
76.16.255.164	2012-09-09 03:56:24
76.23.65.126	2012-08-15 22:42:40

76.23.68.15	2012-11-15 05:12:32
76.23.78.180	2012-11-03 08:32:20
76.29.26.158	2012-09-26 05:47:06
76.29.32.36	2012-08-11 06:27:26
76.29.35.172	2012-10-26 16:22:59
76.29.36.240	2012-11-01 16:17:39
76.29.44.43	2012-10-25 20:40:39
76.29.53.56	2012-10-15 14:40:17
76.29.63.21	2012-10-11 01:13:57
76.29.79.47	2012-10-01 04:11:21
76.29.97.30	2012-11-09 16:11:12
98.193.110.119	2012-10-01 22:52:43
98.193.41.242	2012-09-19 09:48:45
98.193.9.222	2012-10-01 02:38:37
98.206.106.234	2012-10-13 05:49:43
98.206.11.227	2012-11-15 15:49:25
98.206.118.16	2012-10-27 20:04:04
98.206.198.204	2012-08-31 23:26:45
98.206.227.66	2012-08-10 19:49:36
98.206.231.28	2012-08-03 19:26:19
98.206.245.122	2012-09-28 18:36:23
98.206.38.123	2012-10-11 22:26:06
98.206.40.164	2012-08-07 20:23:47
98.206.44.107	2012-08-21 16:56:35
98.206.48.241	2012-10-21 19:53:30
98.206.98.9	2012-11-14 09:11:24
98.212.11.69	2012-11-01 04:15:20
98.212.135.39	2012-11-03 21:02:29
98.212.155.105	2012-11-02 15:15:09
98.212.190.193	2012-09-26 02:18:32
98.212.196.209	2012-10-04 07:07:31
98.212.197.162	2012-08-27 00:32:19
98.212.220.251	2012-09-20 17:56:12
98.212.227.110	2012-08-02 21:56:21
98.212.36.159	2012-10-21 22:48:49
98.212.49.254	2012-08-18 18:23:38
98.212.62.146	2012-08-06 23:57:41
98.213.105.3	2012-09-14 00:03:10
98.213.108.128	2012-10-06 06:18:33
98.213.127.203	2012-08-24 02:07:41
98.213.129.83	2012-10-25 02:07:33
98.213.154.107	2012-10-08 06:29:27
98.213.161.246	2012-08-22 00:48:41
98.213.177.66	2012-10-23 11:42:38
98.213.182.122	2012-10-07 16:34:40
98.213.192.42	2012-09-23 17:08:44
98.213.208.66	2012-10-12 02:52:53

98.213.210.20	2012-09-27 22:32:13
98.213.227.230	2012-09-26 19:38:57
98.213.232.172	2012-08-06 10:03:47
98.213.38.72	2012-11-15 02:17:04
98.213.47.27	2012-11-13 00:06:40
98.213.51.85	2012-08-15 22:37:53
98.213.88.34	2012-09-30 03:04:53
98.213.93.81	2012-10-06 19:45:37
98.214.161.8	2012-10-27 02:45:40
98.214.170.43	2012-10-15 20:48:28
98.214.217.213	2012-08-09 19:50:51
98.215.116.187	2012-11-10 02:16:37
98.215.210.179	2012-11-05 07:06:52
98.215.212.122	2012-11-07 23:36:50
98.215.224.142	2012-08-03 05:01:51
98.215.227.45	2012-09-12 21:12:58
98.215.249.197	2012-10-17 22:15:23
98.215.32.36	2012-09-24 22:44:02
98.215.35.193	2012-09-12 13:30:14
98.215.54.93	2012-11-01 16:47:25
98.215.77.122	2012-09-29 20:47:48
98.215.86.225	2012-10-28 06:34:41
98.222.132.14	2012-09-21 19:32:16
98.222.55.252	2012-10-30 01:50:09
98.222.65.129	2012-08-14 15:59:40
98.222.74.155	2012-09-25 05:08:52
98.222.75.251	2012-11-12 22:59:38
98.222.90.191	2012-10-19 22:21:05
98.223.10.117	2012-11-06 18:58:02
98.223.168.201	2012-11-07 17:28:16
98.223.212.218	2012-10-02 00:37:03
98.223.3.225	2012-09-27 17:30:21
98.223.8.13	2012-10-07 01:27:37
98.223.8.234	2012-10-01 18:54:24
98.223.89.194	2012-08-01 14:56:54
98.226.118.15	2012-08-23 16:26:46
98.226.17.78	2012-10-12 13:41:22
98.226.211.151	2012-11-10 05:25:37
98.226.68.25	2012-09-22 02:36:51
98.227.107.209	2012-11-04 05:50:12
98.227.107.24	2012-11-08 00:33:57
98.227.110.118	2012-11-08 06:48:20
98.227.134.132	2012-10-22 16:04:40
98.227.137.60	2012-09-27 09:04:14
98.227.146.114	2012-11-01 02:10:16
98.227.166.161	2012-10-27 21:42:55
98.227.220.235	2012-10-11 01:24:35

98.227.221.131	2012-09-25 16:18:04
98.227.240.143	2012-10-17 18:26:10
98.227.36.247	2012-11-05 15:18:21
98.227.93.145	2012-09-27 08:35:27
98.228.138.109	2012-10-30 12:22:08
98.228.179.208	2012-08-20 15:23:41
98.228.196.35	2012-10-02 22:55:42
98.228.214.119	2012-11-12 21:38:02
98.228.231.69	2012-10-30 04:26:13
98.228.239.222	2012-08-10 01:41:49
98.228.245.111	2012-10-19 00:40:11
98.228.50.64	2012-09-29 03:53:02
98.228.72.139	2012-11-12 23:15:59
98.228.73.51	2012-10-09 02:14:11
98.253.133.48	2012-10-04 19:02:22
98.253.178.180	2012-08-15 00:37:52
98.253.188.21	2012-11-13 00:01:48
98.253.233.38	2012-11-02 23:27:27
98.253.39.234	2012-10-12 01:52:04

EXHIBIT B

those associated, 2) costs associated with restoring its computer systems to their condition prior to the breach of its computer systems and preventing future breaches, and 3) lost revenue and costs incurred due to interruption of service.

23. The above alleged facts support a claim of Computer Tampering under 720 ILCS 5 § 16D-3.²

PRE-SUIT DISCOVERY

24. The allegations contained in the preceding paragraphs are hereby re-alleged as if fully set forth herein.

25. Each Doe used one or more hacked passwords to gain unauthorized access to Petitioner's protected computer systems in direct violation of the Computer Fraud and Abuse Act, 18 U.S.C. § 1030, and Computer Tampering, 720 ILCS 5 § 16D-3.

26. The above alleged facts support claims of computer fraud and abuse and computer tampering by Petitioner against the Does. Petitioner will be an actual party, and not merely a witness or other third party to the claims brought against the Does.

27. Petitioner does not know the Does' true identities. Each of the Does' true identities is known only to each Doe and by Comcast, to which each Doe subscribes.

28. Petitioner seeks the name, address, telephone number, email address, MAC address and any other form of information that may be used to identify the Does. Petitioner is interested in and entitled to this information so that Petitioner may bring claims of computer fraud and abuse and computer tampering against the Does in this county.

² A private right of action exists under the Statute under 720 ILCS 5 § 16D-3(c).

October 4, 2012, 12:15PM

Cybercrime Gang Recruiting Botmasters for Large-Scale MiTM Attacks on American Banks

by Michael Mimoso

A slew of major American banks, some already stressed by a stream of DDoS attacks carried out over the past 10 days, may soon have to brace themselves for a large-scale coordinated attack bent on pulling off fraudulent wire transfers.

RSA's FraudAction research team has been monitoring underground chatter and has put together various clues to deduce that a cybercrime gang is actively recruiting up to 100 botmasters to participate in a complicated man-in-the-middle hijacking scam using a variant of the proprietary Gozi Trojan.

This is the first time a private cybercrime organization has recruited outsiders to participate in a financially motivated attack, said Mor Ahuvia, cybercrime communications specialist for RSA FraudAction. The attackers are promising their recruits a cut of the profits, and are requiring an initial investment in hardware and training in how to deploy the Gozi Pranimalka Trojan, Ahuvia added. Also, the gang will only share executable files with their partners, and will not give up the Trojan's compilers, keeping the recruits dependent on the gang for updates

Generally, cybercrime gangs deploy as few as five individual botmasters to help in successful campaigns; with this kind of scale, banks could be facing up 30 times the number of compromised machines and fraudulent transfers, if the campaign is successful.

"This Trojan is not well known. This is not SpyEve or Citadel; it's not available for everyone to buy," Ahuvia said. "Security vendors and antivirus signatures are less likely to catch it or be familiar with it. It will be tricky for vendors to detect and block it. This gang is keeping a tight hold on the compiler. By only giving up executable files, they can control how any antivirus signatures are in the wild and keep unique signatures to a minimum."

As many as 30 banks have been targeted, many of them well known and high profile, Ahuvia said. RSA said the gang is targeting American banks because of past success in beating their defenses, as well as a lack of two-factor authentication required for wire transfers. Some European banks, for example, require consumers to use two-factor authentication. She added that RSA FraudAction was unsure how far along the recruitment campaign had gone, or when the attacks would launch.

"There is the chance that once we've gone public, they may abandon their plans because there's too much buzz around it," Ahuvia said. "On the other hand, I don't think anything we know will have such

a dramatic effect on them. There are so many Trojans available and so many points of failure in security that could go wrong, that they'd still have some chance of success."

RSA's researchers were able to make the connection to the Gozi Primumalka Trojan, which has been in circulation since 2008 and responsible for \$5 million in fraud-related losses. Primumalka is similar to the Gozi Trojan in technical and operational aspects, RSA said, leading to speculation the HangUp Team, which was tied to previous Gozi attacks, is behind this attack as well. Primumalka is Russian for the word "receive" and is a folder name in every URL patch given by this particular gang to its crimeware servers.

Primumalka uses the same bot-to-server communication pattern and URL trigger list as Gozi, RSA said. But deployment of the two Trojans is different: Gozi writes a single DLL file to bots upon deployment, while Primumalka writes two, an executable file and a DAT file which reports to the command and control server.

Once the Trojan is launched, the botmaster fires up a virtual machine syncing module. The module then duplicates the victim's computer, including identifiable features such as time zone, screen resolution, cookies, browser type and version, and software identification, RSA said. This allows the botmaster to impersonate the victim's machine and access their accounts. Access is carried out over a SOCKS proxy connection installed on the victim's machine, RSA said.

The cloned virtual system then can move about on the genuine IP address of the compromised machine when accessing the bank website. Taking it a step further, the attackers deploy VoIP phone flooding software that will prevent the victim from receiving a confirmation call or text alerting them to unusual transfer activity, RSA said.

"They are looking for this to be a quick campaign," Ahuvia said. "They want to make as much as they can until the banks and users harden their systems. They want to cash out quickly."

Commenting on this Article will be automatically closed on January 4, 2013.

EXHIBIT C

10/6/12

No slowdown in sight for cyberattacks - USATODAY.com

2:43 PM EDT

No slowdown in sight for cyberattacks

By Byron Aebischer, USA TODAY

Updated 2:43 PM EDT

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LAS VEGAS - Cyber attacks are accelerating at a pace that suggests the Internet - already a risky environment - is likely to pose a steadily growing threat to individuals and companies for years to come.

That's the somber consensus of security and Internet experts participating in the giant Black Hat cybersecurity conference that concluded here this week.

Internet-generated attacks comprise "the most significant threat we face as a civilized world, other than a weapon of mass destruction," Shawn Henry, former head of the FBI's cybercrime unit, told some 6,500 attendees in a keynote address.

Joe Stewart, Dell SecureWorks' director of malware research, presented research detailing the activities of two large cyber gangs, one based in Shanghai the other in Beijing, that have cracked into the networks of thousands of companies over the past half dozen years.

The attacks invariably begin by infecting the computer of one employee, then using that machine as a foothold to patiently probe deep into the company's network. The end game: to steal customer lists, patents, bidding proposals and other sensitive documents.

Getty Images

Internet-generated attacks comprise the most significant threat we face as a civilized world, other than a weapon of mass destruction, according to one security expert.

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Each gang is made up of dozens of employees playing complementary roles in attacks that are "stealthy and persistent," says Stewart. "Even if they do get discovered and get kicked out of a network, they come back, targeting a different employee."

Another gang, analyzed by Dell SecureWorks' researcher Brett Stone-Gross, has been blasting out spam, designed to slip past spam filters. The messages carry instructions to click on a link to read bogus delivery invoices, airline reservations or cellphone bills. The link, however, takes the user to a web page that installs malicious software.

Stone-Gross said the gang currently has access to 876,000 infected PCs, some of which are used to carry out its lucrative specialty: orchestrating fraudulent wire transfers from online banking accounts.

Meanwhile, a different category of hackers is stepping up attacks, not on individual PCs, but on company websites. Website attacks now routinely occur thousands of times each, as criminals probe for ways to breach databases carrying usernames and passwords and other valuable data, says David Koretz, general manager of website security firm Mykonos, a division of Juniper Networks.

Some successful website hackers enjoy boasting — by publically posting some, if not most, of the stolen data. That's happened recently with data stolen from online retailer Zappos, matchmaking site eHarmony, business social networking site LinkedIn and search giant Yahoo, Koretz says.

Experts say web attacks continue to escalate partly because powerful, easy-to-use hacking programs are widely available for free. What's more, opportunities for an intruder to take control of an individual's PC, or access and probe a company's network, are multiplying as society uses more Internet-delivered services and Internet-connected mobile devices.

"It's easier and safer for a criminal to steal money from an online bank account, rather than have to walk into a bank — or to steal intellectual property in an online setting, rather than have to send in a human spy," says Eddie Schwartz, chief security officer of security firm RSA, a division of EMC.

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EXHIBIT D

Apple Device IDs Allegedly Stolen From FBI Laptop | Threat Level | Wired.com

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Hackers Release 1 Million Apple Device IDs Allegedly Stolen From FBI Laptop

By Kim Zetter [Email](#) [Author](#)

09.04.12

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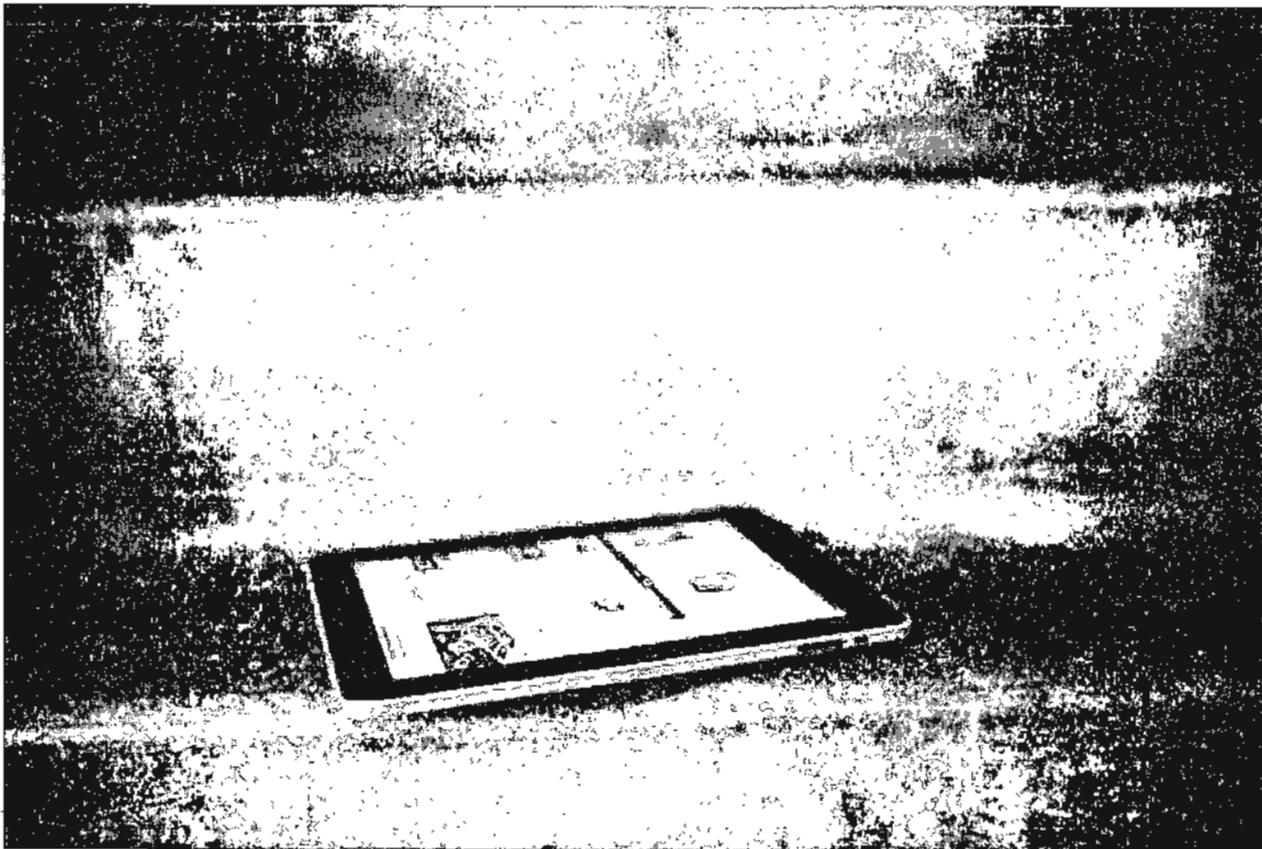


Photo: Wired

The hacker group AntiSec has released 1 million Apple device IDs that they say they obtained from an FBI computer they hacked.

The hackers say they actually stole 12 million IDs, including personal information, from the hacked FBI computer, but released only 1 million in an encrypted file published on torrent sites. In a lengthy post online, the hackers wrote that last March, they hacked a laptop belonging to an FBI agent named Christopher K. Stangl from the bureau's Regional Cyber Action Team and the New York FBI office's Evidence Response Team.

The hackers say the IDs were stored in a file on Stangl's desktop titled "NCFTA_iOS_devices_intel.csv."

Apple Device IDs Allegedly Stolen From FBI Laptop | Threat Level | Wired.com

The file, according to the hackers, contained a list of more than 12 million Apple iOS devices, including Unique Device Identifiers (UDID), user names, names of devices, types of devices, Apple Push Notification Service tokens, ZIP codes, cellphone numbers, and addresses. The hackers released only 1 million UDIDs, however, and did not release the accompanying personal information for the IDs.

Apple UDIDs are a 40-character alphanumeric string that is unique to each Apple device. It's not known why the FBI possessed the Apple IDs. The hackers suggested in a tweet from the the @AnonymousIRC account, that the FBI was using the information to track users.



AnonymousIRC
@AnonymousIRC

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12,000,000 identified and tracked iOS devices. thanks FBI SSA
Christopher Stangl. #AntiSec

3 Sep 12

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Stangl may have been targeted because he was on an e-mail that members of Anonymous intercepted last January. The e-mail was sent to several dozen U.S. and European law-enforcement personnel to participate in a conference call discussing efforts to investigate Anonymous and other hacking groups. The email included a call-in number for the discussion, which members of Anonymous recorded and posted online last February.

The hackers say they released the Apple UDIDs so that people would know that the FBI may be tracking their devices and also because, they wrote in their online post, "we think it's the right moment to release this knowing that Apple is looking for alternatives for those UDID currently ... but well, in this case it's too late for those concerned owners on the list."

Apple has been criticized for hard-coding the ID's in devices, since they can be misused by application developers and others to identify a user, when combined with other information, and track them. Last April, Apple began rejecting applications that track UDIDs.

The Next Web has created a tool for users to check if their Apple UDID is among those that the hackers released.

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EXHIBIT E

10/6/12

AFP: Cyber defenders urged to go on the offense

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Cyber defenders urged to go on the offense

By Glenn Chapman (AFP) — Jul 26, 2012

LAS VEGAS — Computer security champions on Wednesday were urged to hunt down and eliminate hackers, spies, terrorists and other online evildoers to prevent devastating Internet Age attacks.

The first day of briefings at a prestigious Black Hat computer security gathering here opened with a former FBI cyber crime unit chief calling for a shift from defense to offense when it comes to protecting networks.

"We need warriors to fight our enemies, particularly in the cyber world right now," Shawn Henry said in a Black Hat keynote presentation that kicked off with dramatic video of hostage rescue teams training.

"I believe the threat from computer network attack is the most significant threat we face as a civilized world, other than a weapon of mass destruction."

The peril grows as water supplies, power grids, financial transactions, and more rely on the Internet and as modern lives increasingly involve working and playing on smartphones or tablet computers, according to Henry.

He rolled off a list of adversaries ranging from spies and well-funded criminals to disgruntled employees with inside knowledge of company networks.

"Cyber is the great equalizer," Henry said.

"With a \$500 laptop with an Internet connection anybody, anywhere in the world can attack any organization, any company," he continued. "The last time I checked, that was about 2.3 billion people."

After 24 years of working for the FBI, Henry in April switched to the private sector as the head of a division at startup CrowdStrike specializing in cyber attack incident responses and identifying adversaries.

The computer security industry to expand its arsenal beyond just building walls, filters and other safeguards against online intruders to include watching for, and gathering intelligence on, culprits who have slipped through.

"It is not enough to watch the perimeter," Henry said, equating computer security to protecting real world offices. "We have to be constantly hunting; looking for lipwires."

In the cyber world, that translates into monitoring system activities such as whether files have been accessed or changed and by whom.

"The sophisticated adversary will get over that firewall and walk around, like an invisible man," Henry said. "We have to mitigate that threat."

Tactics for fighting cyber intruders should include gathering information about how they operate and the tools used, and then sharing the data in the industry and with law enforcement agencies in relevant countries.

"Intelligence is the key to all of this," Henry said. "If we understand who the adversary is, we can take specific actions."

Teamwork between governments and private companies means that options for responding to identified cyber attackers can range from improved network software to political sanctions or even military strikes, according to Henry.

"You can't make every school, every mall, every university, and every workplace impenetrable," Henry said. "We have to look at who the adversary is and stop them in advance of them walking in."

Black Hat founder Jeff Moss, the self-described hacker behind the notorious Def Con gathering that starts here on Thursday, backed Henry's argument.

"Maybe we need some white blood cells out there; companies willing to push the edge and focus on threat actors," Moss said, calling on the computer security community to "raise the immunity level."

Moss is head of security at the Internet Corporation for Assigned Names and Numbers, which oversees the world's website addresses.

"So, am I Luke, or am I Darth Vader, sometimes I'm not sure," Moss quipped about his roles in the hacker realm and the computer security industry.

"It depends upon which day and who asks."

Moss proposed that cyber attackers also be fought on legal fronts, with companies taking suspected culprits to court.

"I can't print money; I can't raise an army, but I can hire lawyers and they are almost as good," Moss said. "One way to fight the enemy is you just sue them."

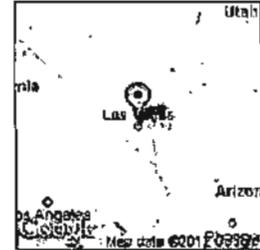
Henry feared that it may take an Internet version of the infamous 9/11 attack in New York City to get the world to take the cyber threat to heart.

"We need to get down range and take them out of the fight," Henry said.



Former FBI cyber crime unit chief Shawn Henry was the keynote speaker at the Black Hat computer security gathering (AFP/Getty Images/File)

Map



10/6/12

AFP: Cyber defenders urged to go on the offense

"As well-trained, well-equipped cyber warriors you can have an impact; the stakes are high."

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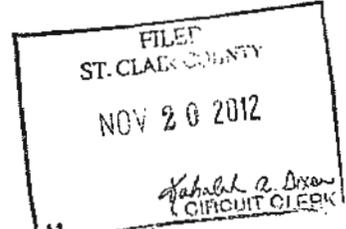
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IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
ST. CLAIR COUNTY, ILLINOIS
LAW DIVISION

GUAVA LLC,)
)
Petitioner,)
v.)
COMCAST CABLE COMMUNICATIONS, LLC,)
)
Respondent.)

No. 12mR 417



**MEMORANDUM OF LAW IN SUPPORT OF PETITION FOR DISCOVERY BEFORE
SUIT TO IDENTIFY RESPONSIBLE PERSONS AND ENTITIES**

I. INTRODUCTION

Through this petition for discovery, Petitioner, the owner of various private websites, seeks to learn the identities of unidentified John Does (“Does”) from Internet Service Provider (“ISP”) Respondent Comcast Cable Communications, LLC (“Comcast”), so that Petitioner may file computer fraud and abuse and computer tampering suit against these individuals. Since Does used the Internet to commit their violations, Petitioner only knows Does by their Internet Protocol (“IP”) addresses. Does’ IP addresses were assigned to Does by Comcast. Accordingly, Comcast can use the IP addresses to identify Does. Indeed, Comcast maintains internal logs, which record the date, time and customer identity for each IP address assignment made by Comcast. Significantly, Comcast only maintain these logs for a very short period of time.

Petitioner seeks an order requiring Comcast to respond to a subpoena that will be served it requiring Comcast to disclose the true name, address, telephone number, e-mail address and Media Access Control (“MAC”) address¹ of the Does. Petitioner will only use this information to resolve its computer fraud and abuse and computer tampering dispute with the Does. Without

¹ A MAC address is a number that identifies the specific device used for the hacking activity.

this information, Petitioner cannot name Does in future computer fraud and abuse and computer tampering suits nor immediately serve Does to pursue any such lawsuit to protect itself.

As explained below, Petitioner is indisputably entitled to learn the identity of Does and a petition for pre-suit discovery is a proper tool for this purpose. Accordingly, this Court should grant this petition.

II. FACTUAL BACKGROUND

Petitioner operates computer systems that distribute third-party adult entertainment content. As alleged in the Petition, Petitioner has actionable claims for computer fraud and abuse and computer tampering against each of the Does. Does used hacked passwords to gain unauthorized access to Petitioner's protected computer systems.

Although Petitioner does not know Does' true identities, Petitioner's agents identified each of the Does by a unique IP address assigned to that Doe by Comcast and the date and time of the hacking activity. Comcast maintains internal logs which record the date, time, and customer identify for each IP address assignment made. Comcast can use the IP address provided by Petitioner to identify the Does. Comcast, however, only retains the information necessary to correlate an IP address to a person for a short amount of time. Accordingly, time is of the essence with respect to getting the subpoenas to Comcast so that Comcast may preserve and maintain this information necessary to identify Does.

III. ARGUMENT

Petitioner may obtain the identities of the Does through a petition for discovery pursuant to Illinois Supreme Court Rule 224. A petition for discovery before suit to identify responsible persons and entities may be used by "[a] person or entity who wishes to engage in discovery for the sole purpose of ascertaining the identity of one who may be responsible in damages . . ." 134

Ill. 2d R. 224. Illinois courts grant petitions for pre-suit discovery when, like in the present case, the identities of the defendants are unknown to the plaintiff. *John Gaynor v. Burlington Northern and Santa Fe Railway*, 750 N.E.2d 307, 312 (Ill. App. Ct. 2001) (“Rule 224’s use is appropriate in situations where a plaintiff has suffered injury but does not know the identity of one from whom recovery may be sought.”); *Roth v. St. Elizabeth’s Hospital*, 607 N.E.2d 1356, 1361 (Ill. App. Ct. 1993) (“[Rule 224] provides a tool by which a person or entity may, with leave of court, compel limited discovery before filing a lawsuit in an effort to determine the identity of one who may be liable in damages.”) (Quoting 134 Ill. 2d R. 224, Committee Comments, at 188-89)).

The “identity” that Petitioner is entitled to ascertain is more than just the names of the unknown Does. *John Gaynor*, 750 N.E.2d at 312 (“on occasion, the identification of a defendant may require more than simply a name and that, on those occasions, discovery under Rule 224 is not limited to the petitioner’s ascertainment of a name only.” (Citing *Beale v. EdgeMark Financial Corp.*, 664 N.E.2d 302 (Ill. App. Ct. 1996))). Petitioner requires this additional information,² because sometimes the Internet subscriber and the actual hacker are determined to not be one and the same.³ Petitioner needs all the identifying information it seeks to make this determination.

Further, Petitioner is not precluded from the information it seeks simply because it is aware of the Does’ IP addresses. The court in *Beale* explains that the pre-suit discovery is not precluded “solely on the basis of the petitioner’s knowledge of a name only.” 664 N.E.2d at 307.

² The address, telephone number, e-mail address, and Media Access Control address of each account holder.

³ For instance, an individual who lives alone with a secure wireless Internet connection is very likely to be both the account holder and the hacker. In contrast, where the account holder is, for example, the wife of the household it is more likely the case—given the nature of Petitioner’s business—that the husband or a college-aged son is the appropriate hacker. In other words, in the latter example the account holder and the hacker are most likely not the same individual.

Knowledge of the Does' IP addresses does not provide Petitioner with sufficient information to name and bring a lawsuit against them. If mere knowledge of the defendant's name is not enough to preclude pre-suit discovery under Rule 224, then mere knowledge of the Does' IP address is also not enough to preclude the pre-suit discovery.

In short, Petitioner is using the petition for pre-suit discovery for its intended purpose: to identify the names of the people who have harmed it. There is no legal or equitable reason why Petitioner should be prohibited from seeking the Does' identities from Comcast.

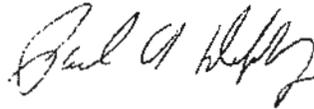
IV. CONCLUSION

For all the forgoing reasons, the Court should enter an order granting this petition.

Respectfully submitted,

Guava LLC

DATED: November 16, 2012



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IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
ST. CLAIR COUNTY, ILLINOIS
LAW DIVISION

GUAVA LLC,)
)
 Petitioner,)
 v.)
)
 COMCAST CABLE COMMUNICATIONS, LLC,)
)
 Respondent.)
 _____)

No. 12MR417

ORDER GRANTING PETITION FOR DISCOVERY BEFORE SUIT TO IDENTIFY RESPONSIBLE PERSONS AND ENTITIES

THIS CAUSE, having come before this Court on Petitioner’s Petition for Discovery before Suit to Identify Responsible Persons and Entities (“Petition”), and the Court having reviewed said Petition, the Memorandum of Law filed in support thereof, and being otherwise duly advised in the premises, it is hereby

ORDERED AND ADJUDGED as follows:

1. The Petition is GRANTED.
2. Petitioner may serve Respondent Comcast Cable Communications LLC (“Comcast”) with a subpoena commanding Comcast to provide Petitioner with the true name, address, telephone number, e-mail address, Media Access Control (“MAC”) address for each of the John Does (“Does”) to whom Comcast assigned an Internet Protocol (“IP”) address as set forth on Exhibit A to the Petition. Petitioner shall attach to any such subpoena a copy of this Order. Comcast shall comply with it the subpoena issued pursuant to this Order.
3. Comcast shall not require Petitioner to pay a fee in advance of providing the subpoenaed information; nor shall Comcast require Petitioner to pay a fee for an IP address that is not controlled by Comcast, or for duplicate IP addresses that resolve to the same individual, or

for an IP address that does not provide the name of a unique individual or for Comcast's internal costs to notify its customers. If necessary, the Court shall resolve any disputes between Comcast and Petitioner regarding the reasonableness of the amount proposed to be charged by Comcast after the subpoenaed information is provided to Petitioner.

4. Petitioner may only use the information disclosed in response to a subpoena served on Comcast for the purpose of identifying the unknown Does so Petitioner can protect and enforce its rights as set forth in its Petition.

DONE AND ORDERED in Chambers at St. Clair County, Illinois this _____
day of _____, 2012.

CIRCUIT COURT JUDGE

EXHIBIT V

**IN THE CIRCUIT COURT
FOR THE TWENTIETH JUDICIAL CIRCUIT
ST. CLAIR COUNTY, ILLINOIS**

GUAVA, LLC,

Petitioner,

v.

COMCAST CABLE COMMUNICATIONS,
LLC,

Respondent.

Case Number: 12-MR-417

Assigned to Honorable Andrew J. Gleeson

Hearing Date: February 21, 2013

Hearing Time: 11:00 A.M.

Hearing Place: Courtroom 404,
County Bldg., Belleville, IL

CONSOLIDATED REPLY IN SUPPORT OF JOHN DOES' MOTIONS TO QUASH

The oppositions filed in this matter only make it increasingly clear that this case is but the latest example of intentional fraud on the Court by the attorneys associated with Prenda Law, Inc.

(a) Fraud on the Court

First, it is irrefutable that there are at least two obvious lies contained in plaintiff's Rule 224 Petition. Paragraph 6 of the Petition states, in no uncertain terms, and *not* on information and belief, that "Venue is proper because at least one of the John Doe Defendants resides in St. Clair County, Illinois. Further, Comcast transacts business in St. Clair County, Illinois." Petition ¶ 6. As shown by the spreadsheet prepared by Comcast, attached hereto as Exhibit R (table showing IP addresses by county)¹, this statement, which was verified under penalty of perjury (although by whom is anyone's guess) is 100% false. ***According to Comcast's records, not a single John Doe defendant actually resides in St. Clair County.*** There is a simple reason for this: ***Comcast does not transact business in St. Clair County***—Charter is the franchised cable operator in the area. Making a stretch argument to try and find a home for a case in St. Clair County is one thing. Resorting to outright fraud to achieve that goal is another. This is no mere mistake. Particularly in view of all the other suspiciously convenient "mistakes" Prenda appears to have made in this case,

¹ The Exhibit lettering used here is continued from the Exhibits to the Declaration of Morgan E. Pietz re: Prenda Law, Inc, which filed by Mr. Pietz in connection with his Motion to Quash.

and its sordid record of fraud on various other Courts around the country, this Court should see past any excuse of mere incompetence and recognize this as an intentional and deliberate fraud.

Second, beyond the lie used to establish jurisdiction and venue, the entire petition action and everything that has flowed from it is all a fraud, because the petition is fraudulently verified. More than a month ago, attorney Thomas Leverso, on behalf of a John Doe, filed a Rule 237 Petition and related Order to Show Cause pointing out the myriad reasons the verification filed in this case is not credible. In response to these very serious allegations that Prenda has filed yet another² fraudulent verification, this time here in this action, Prenda has repeated its usual playbook of ignoring the problem for as long as possible, making procedural objections, and then trying to explain a fraud as some kind of clerical error. The verification appears to say “Alan Moay,” and as Mr. Leverso noted in his Rule 237 Petition, etc., that is a bogus name; according to an investigator using national databases, there is no record of anyone in the United States with such a name.

Prenda’s new story, per its opposition to Mr. Leverso’s Rule Petition, is that the verification does not say “Alan Moay,” rather, it says “Alan Mony.” Opp to Leverson Motion, p. 5. First of all, this, too, is false. The verification very clearly says “Alan Moay.” Prenda has been requested to bring the original verification document to the next hearing to settle this argument; but if past is prologue, it won’t. See Exhibit S (post 2/13 meet and confer email chain).

More importantly though, it now appears that “*Alan Mony, the supposed new name of the verifying “client,” is also a bogus name.*” The same kind of national database search which revealed that there is no “Alan Moay” in the U.S. yields the same results for “Alan Mony”; it’s a bogus name; there is no record of any such person. Exhibit T (investigator report on “Alan Mony”). The closest name anywhere in the U.S. is for an “Allan Mony” with two l’s. *Id.* What does ring a bell though, as far as Prenda goes, is the name “Allan Mooney.” A man named “Allan Mooney” has previously been listed as the manager of MCGIP, LLC, one of Prenda’s earlier

² Another example of a fraudulent verification filed by Prenda, supposedly signed by “Alan Cooper” was attached as Exhibit L to the Dec’l of Morgan E. Pietz. That verification, along with various copyright assignment agreements also supposedly signed by “Alan Cooper” on behalf of Prenda sham entities, is the subject of the scathing Order to Show Cause re: Sanctions from Judge Wright of the Central District of California, a copy of which was lodged with this Court at the last hearing. See *Ingenuity 13, LLC v. John Doe*, C.D. Cal. No. 12-cv-8333, ECF No. 48.

mysterious shell company plaintiffs (which Prenda's lawyers probably own). See Exhibit U, (Minnesota Secretary of State business entity detail for MCGIP, LLC.) According to the Minnesota Secretary of State, the official address for MCGIP, LLC is "care of Alpha Law Group," at Alpha law's office in Minnesota. Alpha Law Group is the newest firm name being used by John Steele's former (current?) law partner Paul Hansemeier, who is also the brother of Prenda's current preferred technical expert Pete Hansemeier.³ Further, a man using the email address "amooney29@gmail.com" is apparently involved in the online adult entertainment business, per an Adult Industry News article where Allan Mooney was selling the domain name <orgasms.com>, a copy of which is attached hereto as Exhibit V. Finally, one "Alan Mooney" is also a current client of Alpha Law / Paul Hansemeier, in *Mooney v. Priceline.Com Incorporated et al.*, No. 12-cv-02731-DWF-JSM (D. Minn. Oct. 26, 2012). Exhibit W (Hennepin County, Minnesota, complaint listing Paul Hansemeier of Alpha Law Firm LLC as attorney of record for plaintiff "Alan Mooney").

After Prenda's newest story was learned by defense counsel the morning of the 2/13 hearing in this matter,⁴ Prenda's past connections to a man named "Allan Mooney" were pointed out to Prenda in follow up attempt meet and confer emails. Specifically, Prenda's past history with "Allan Mooney" was detailed, and all three of Prenda's lawyers in this case were asked to confirm that the new story was that the person who verified the petition spells his name "Alan Mony." Prenda's response, in its entirety (by way of Mr. Hoerner) was "The issues have already been briefed. See you in court." Accordingly, Mr. Hoerner was then advised that since he was the only one who had signed the opposition stating that the affiants name is "Alan Mony"⁵ the defendants

³ For background on how John Setele and Paul Hansemeier's firm started this scheme as Steele Hansemeier, PLLC, but then rebranded as Prenda Law, Inc., refer to the Declaration of Morgan E. Pietz re: Prenda Law, Inc., ¶¶ 5-13.

⁴ This brings up yet another fraud in this case: the proofs of service on Prenda's oppositions. Attorney Morgan Pietz, at least, never received a copy of the opposition that was supposedly mailed to him on February 11, 2013. Just whose name is on that proof of service anyway? While this kind of thing is not usually worth making a fuss over, with Prenda, it is part of a pattern, and, unfortunately, completely typical.

⁵ All of the other oppositions, other than the one where Prenda says the name of the client is really "Alan Mony" were signed by Paul Duffy of Chicago. Presumably, Mr. Hoerner signed the

would proceed on the assumption that this spelling was correct, but would seek costs and fees if Prenda later decided to try and change its story, given the refusal to meet and confer on the issue.

As noted in Mr. Pietz's motion, and supporting declaration, this is not the first time that very serious questions have been raised about Prenda using false names to sign to Court documents, including verifications and declarations offered under penalty of perjury. Pietz Motion, p. 8; Dec'l. of Morgan E. Pietz re: Prenda Law, Inc., ¶¶ 29–42. In fact, this is not even the first time that Prenda, after being accused of fraud on the Court, has responded to that fraud with more fraud; an example which also involved Prenda's misspelling of the name of the supposed affiant. In *Sunlust Pictures, LLC v. Nguyen*, M.D. Fl. No. 12-cv-1685, Prenda attempted to perpetrate another fraud on the Court (holding out John Steele's former paralegal as a "principal" of Sunlust Pictures), all as stated in the hearing transcript attached as Exhibit N to the Dec'l. of Morgan E. Pietz re: Prenda Law, Inc. In an attempt to explain that fraud, Prenda ended up submitting a fraudulent declaration, where the person signing it supposedly misspelled his own name on the signature line. The true principal of *Sunlust* is named Daniel Weber; but the first declaration which *he* supposedly signed, and which Prenda filed in their response to the sanctions motion spelled it "Webber" with two b's. The first declaration was also full of other lies (i.e., that Weber was out of the US during the hearing he had been ordered to attend), which defense counsel there immediately pointed out. Eventually, actual Daniel Weber did file a corrected declaration attempting to explain away his (attorney's) lies in the previous declaration. The fraudulent first declaration, which attempted to explain the fraud on the court, is now the subject of a second sanctions motion. *Sunlust Pictures, LLC v. Nguyen*, M.D. Fl. No. 12-cv-1685 (ECF No. 46, 12/31/13) attached hereto as Exhibit X.

(b) Merits of Movants' Objections to Plaintiff's Rule 224 Petition

Plaintiff's oppositions have no retort to the argument, made by Mr. Pietz in his motion to quash, that use of a Rule 224 petition here is *unnecessary* because the plaintiffs are already sufficiently identified (by I.P. address) that they can be sued for damages without resort to Rule

opposition (to Mr. Leverso's motion) containing the name "Alan Mony" so that Prenda can pretend there was some transcription error on the spelling over the phone, to explain why it is that Prenda has misspelled the name of the purported verifying client for a second time in this case, after being accused of fraud on that issue.

224 discovery. On its face, Rule 224 is narrowly limited to situations where discovery is “necessary,” and *Gaynor v. Burlington Northern and Santa Fe Railway*, 750 N.E.2d 307 (2001) clarifies that if a plaintiff has enough information already to sue for damages, Rule 224 discovery should be denied. Here, as in *Gaynor*, the existence of a parallel action for damages (here, the *Lightspeed* case) conclusively proves that Rule 224 discovery is not a “condition precedent” to filing a complaint for damages. Even if we accept plaintiff’s dubious representation that Guava, LLC has “has no corporate or other relation” to Lightspeed Media Corporation (Opp. to Leverso Motion, p. 1), it does not matter. Regardless of whether Lightspeed and Guava are the same entity or not, the bottom line is that Prenda has already proven conclusively, through the *Lightspeed* case, that in its view, Prenda can file a complaint against a single John Doe defendant, *identified only by IP address*, and then make its case using the regular discovery provisions of Rule 201. If suing a John Doe identified by solely by IP address for damages was sufficient for Prenda in *Lightspeed*, why is Rule 224 discovery now suddenly a “condition precedent” to filing the *exact* same kind of suit here now? Prenda has filed hundreds of complaints for damages, based on an IP address alone; its new position that it now believes Rule 224 discovery is *required* before it can file such complaints is another misrepresentation made in bad faith.

Movants cited chapter and verse, black letter law, that when considering a Rule 224 Petition, the Court should apply a Section 2-615 analysis to the claims at issue. *See, e.g.*, Pietz Motion, pp. 9. Having established that proposition, movants then cited a slew of CFAA cases⁶ all of which clearly establish that plaintiff’s claims do not pass muster under a Section 2-615 analysis. *See, e.g.*, Pietz Motion, pp. 16–20. Plaintiff responded to this array of authority in its opposition with a bit of a curveball. Rather than argue that the allegations in the Petition state a valid claim under the Computer Fraud and Abuse Act, plaintiff instead premises its argument on the notion that a Section 2-615 analysis of the underlying claim is not required in a Rule 224 petition action. Simply put, plaintiff needs to (re?)-read the many cases cited by movants which establish this point as black letter law. The closest plaintiff comes to a coherent argument on this issue is the observation that many of the Rule 224 cases cited by movants involved underlying claims for

⁶ No cases were needed on the Computer Tampering claim; the relief sought here is barred on the face of the statute itself, since there are no allegations of a virus or malware. *See* Pietz Motion, pp. 19–20.

defamation, rather than underlying claims for CFAA or Computer Tampering violations. So what? The point of general standards for analysis is that they can be used in different circumstances. Whatever the underlying claim at issue, the law is clear that the applicable analysis that should be applied to Rule 224 petitions is a Rule 2-615 analysis. Plaintiffs are correct to note that “illegal hacking is not protected by the First Amendment;” however, neither, for that matter, is defamation protected by the First Amendment. Plaintiff’s entire argument on the Section 2-615 analysis makes no sense and should be viewed as a tacit admission that the allegations in the Petition, if true, could not state a causes of action for CFAA or Computer Tampering.

One argument plaintiff does engage with in the oppositions is movants point that the petition is overbroad insofar as it requests phone numbers, emails and MAC addresses. As argued in Mr. Pietz’s motion, Rule 224 petitions are limited to information needed to *identify* defendants, and in most cases, a name and address is sufficient for that purpose. Here, plaintiff wants the phone numbers, emails and MAC addresses not to *identify* potential defendants, but because it wants to hold Internet subscribers *responsible* for infringement.⁷ But Rule 224 does not permit discovery to reach blame or liability; it is limited to identification of a potential defendant. Movants cite cases standing for the proposition that this means a name and address, no more. Plaintiff cites no authority suggesting that phone numbers, emails, or MAC addresses are appropriate information for a Rule 224 Petition, and there is none.

(c) Response to Plaintiff’s Counter Arguments in the Oppositions

Plaintiff’s main responsive counter-argument is that movants supposedly do not have standing to challenge a subpoena seeking their identifying information. First, this argument ignores this Court’s December 12, 2012 order, which explicitly grants ISP subscribers like movants an opportunity to object this petition action. Second, Rule 224, on its face, provides for a required hearing. Third, this Court was correct to invite movants to object, because movants absolutely do have standing to object to the release of their identifying information to a litigant engaged in a fraudulent, extortionate enterprise. Even if plaintiffs were acting in good faith, and this entire action was not predicated on various frauds, movants would still have standing to object

⁷ See also the copy of the Guava, LLC extortion letter being used in this case, which was lodged with the Court at the 2/13 hearing.

to the release of their information. As expounded in further detail in Mr. Leverso's motion (pp. 2-5), movants here do have standing to object. The court need only look at essentially any reported appellate case on Rule 224 petitions ever decided to verify this proposition; the challenging party is almost always the third party about whom information is being sought (i.e., the real party in interest), not the respondent with the records. Like a subpoena, the Rule 224 petition, seeks to infringe upon movants legitimate interests to be free of oppression, embarrassment, or undue burden. *See Bush v. Catholic Diocese*, 351 Ill.App.3d 588, 591, 814 N.E.2d 135 (3d Dist. 2004); *United States v. Ranieri*, 670 F.2d 702,772 (7th Cir. 1982) accord *Special Mkts. Ins. Consultants, Inc. v. Lynch*, Case No. 11 C 9181, 2012 WL1565348 (N.D. Ill. May 2, 2012).

Plaintiff's other featured argument, that movants do not have "approval to proceed anonymously," is a complete red herring. As the court rightly noted at the February 13, 2013 hearing with respect to the *in pro per* litigant in attendance, the main issue being litigated right now is whether the Movants should be identified to the plaintiff. The time to brief the issue anonymous participation in judicial proceedings, and the potential limited use of a "John Doe" pseudonym for purposes of the public docket, is after the court determines whether Movants should be identified in the first place and if these people are actually sue for damages. Either the Court is going to deny the petition so that no information is disclosed, or it is going to order that Comcast identify the Movants to the plaintiff. Plaintiff's position that 'in order to object to plaintiff's subpoena seeking to identify you, you need to first identify yourself to the plaintiff' is plainly a Catch 22 that makes no sense.

Most of the balance of plaintiff's oppositions amount to little more than personal attacks on certain of the defense attorneys involved in this action. With respect to the attacks on Mr. Pietz, Judge Wright's order from the Central District of California, relating to a series of related cases where Mr. Pietz was very involved, speaks for itself. *Ingenuity 13, LLC v. John Doe*, C.D. Cal. No. 12-cv-8333, ECF No. 48 (copy lodged with the Court at the 2/13 hearing). Since that order has been issued, Paul Duffy (counsel here) and Prenda Law have more or less dismissed all Ingenuity 13 and AF Holdings cases in California, and most of them across the country—which could perhaps be viewed as a tacit admission that all of Prenda's AF Holdings and Ingenuity 13

cases were also fraudulent upon inception—just like the fraudulently verified petition full of lies about venue and jurisdiction currently before this Court.

Finally, the extortion letter from Brett Gibbs,⁸ as “in house counsel for Guava, LLC,” clarifies what the movants have suspected all along: that this case is not really a ‘password hacking’ CFAA case, but a BitTorrent copyright infringement case in disguise. Mr. Gibbs’ letter makes clear that really, the gravamen of the complaint against the John Does is not that they breached a computer network; its that they engaged in file-sharing on BitTorrent (which is possibly copyright infringement, but not computer fraud). This only lends further support to the notion that this whole suit is a transparent attempt to abuse this Court’s jurisdiction, and the Rule 224 process, to seek the kind of discovery that Prenda is now routinely denied in copyright infringement cases in federal court. Again, Prenda has told the Court one thing—*i.e.*, that it wants to sue people under the CFAA—but then done another—*i.e.*, try and then use the subpoena return info to bring claims for copyright infringement.

(d) Conclusion

The kind of abuse Prenda Law is up to—lying about jurisdiction and venue, systemic filing of bogus verifications and other documents, filing claims that cannot withstand even basic legal scrutiny, pressuring people to “settle” when it knows many such people are probably totally innocent—undermine the very integrity of the legal system. These missteps are not mistakes. They are part of a calculated scheme that, even without all of the fraud, comes very close to extortion. However, the Declaration of Morgan E. Pietz makes clear that his case is part of a systemic, calculated national conspiracy, which (particularly if Alan Cooper’s allegations of identity theft prove true) may very well be a criminal enterprise. Accordingly, movants respectfully request that this court follow Judge Wright’s lead, and come down on Prenda Law like a ton of bricks. Prenda’s various frauds on various courts—including this one—have gone on for long enough. The Rule 224 subpoena should be denied as to the movants, and the next and final issue the Court should then consider is awarding sanctions and attorneys fees.

As of 12:00 noon PST on Friday February 15, 2013, undersigned counsel is authorized to report that in addition to Mr. Pietz’s clients with IP address numbers 71.229.73.180 and

⁸ This letter is the second document lodged with the Court at the February 13, 2013 hearing.

67.162.81.65; attorney Thomas Leverso, on behalf of his client with I.P. address number 68.58.68.84; attorney Earl Hubbs, on behalf of his client with IP address number 24.14.130.85; and attorney Holly A. Reese on behalf of her client with IP address number 79.29.36.240; all join in this consolidated reply.

Respectfully submitted,

DATED: February 15, 2013,

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CERTIFICATE/PROOF OF SERVICE

On this day, I, on oath, state that I on this day I served this notice and true and accurate copies of the above documents by personal service and/or mailing copies to each entity to whom they were directed by depositing the same in the U.S. Mail, proper postage prepaid in full, at a U.S. Postal Depository on this day before the hour of 4:00 p.m.

Dated: February 15, 2013

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TICKET #	IP ADDRESS	CUSTOMER CITY	CUSTOMER COUNTY	CUSTOMER STATE
431809	173.9.253.149	PEOTONE	WILL	IL
431810	23.25.47.84	ROSELLE	DUPAGE, COOK	IL
431811	24.1.107.63	EVANSTON	COOK	IL
431812	24.1.191.211	CHICAGO	COOK	IL
431813	24.1.141.155	SPRINGFIELD	SANGAMON	IL
431814	24.1.175.233	CHICAGO	COOK	IL
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431816	24.12.113.158	MOUNT PROSPECT	COOK	IL
431817	24.1.95.156	CHICAGO	COOK	IL
431818	24.1.98.146	CHICAGO	COOK	IL
431819	24.12.116.87	CHICAGO	COOK	IL
431820	24.12.160.43	BUFFALO GROVE	COOK	IL
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431822	24.12.17.76	CHICAGO	COOK	IL
431824	24.12.235.189	LIBERTYVILLE	LAKE	IL
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431826	24.12.255.78	CHICAGO	COOK	IL
431827	24.12.30.72	AURORA	KANE, DUPAGE, ETC	IL
431828	24.12.9.239	CHICAGO	COOK	IL
431829	24.13.103.83	CHICAGO	COOK	IL
431830	24.13.118.250	CHICAGO	COOK	IL
431831	24.13.137.179	CHICAGO	COOK	IL
431832	24.13.161.156	SCHAUMBURG	DUPAGE	IL
431834	24.13.172.38	ARLINGTON HEIGHTS	COOK, LAKE	IL
431835	24.13.178.197	SCHAUMBURG	DUPAGE	IL
431836	24.13.187.100	GLENDALE HEIGHTS	DUPAGE	IL
431837	24.13.235.108	HIGHLAND PARK	LAKE	IL
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431851	24.14.191.209	GLEN ELLYN	DUPAGE	IL
431852	24.14.211.234	NEW LENOX	WILL	IL
431853	24.14.22.26	ADDISON	DUPAGE	IL
431854	24.14.226.226	NEW LENOX	WILL	IL
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431856	24.15.0.234	WILLOWBROOK	DUPAGE	IL
431857	24.15.108.237	CREST HILL	WILL	IL
431858	24.15.188.130	DOWNERS GROVE	DUPAGE	IL
431859	24.15.194.37	DEERFIELD	LAKE	IL
431860	24.15.21.54	BELLWOOD	COOK	IL
431861	24.15.225.33	MUNDELEIN	COOK	IL
431862	24.15.29.44	CHAMPAIGN	CHAMPAIGN	IL
431863	24.15.48.154	OAK PARK	COOK	IL
431864	24.15.94.96	LOCKPORT	WILL	IL
431865	24.63.77.213	CHESTNUT HILL	MIDDLESEX	MA
431866	24.7.197.117	CHAMPAIGN	CHAMPAIGN	IL
431867	24.7.199.112	CHAMPAIGN	CHAMPAIGN	IL
431868	24.7.214.221	WESTMONT	DUPAGE	IL
431869	50.129.14.36	CHICAGO	COOK	IL
431870	50.129.252.207	CHICAGO	COOK	IL
431871	50.129.68.62	ROCKFORD	WINNEBAGO	IL
431872	50.129.69.141	MACHESNEY PARK	WINNEBAGO	IL
431873	50.129.92.32	DEKALB	DEKALB	IL
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431885	67.162.29.246	DEKALB	DEKALB	IL
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431889	67.162.51.34	WORTH	COOK	IL
431890	67.162.81.65	CHICAGO	COOK	IL
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431893	67.163.76.75	ORLAND PARK	COOK	IL
431894	67.163.89.166	JOLIET	WILL, KENDALL	IL
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431917	67.173.104.228	WAUKEGAN	LAKE	IL
431918	67.173.113.134	WOODRIDGE	DUPAGE	IL
431919	67.173.142.217	WESTMONT	DUPAGE	IL
431920	67.173.41.116	LOMBARD	DUPAGE	IL
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431928	67.174.7.214	STONE PARK	COOK	IL
431930	67.175.164.253	MELROSE PARK	COOK	IL
431931	67.175.167.179	CHICAGO	COOK	IL
431932	67.175.201.238	CHICAGO	COOK	IL
431933	67.175.219.14	DEKALB	DEKALB	IL
431934	67.175.225.135	SCHILLER PARK	COOK	IL
431935	67.175.34.7	WESTERN SPRINGS	COOK	IL
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431939	67.176.64.86	CHICAGO	COOK	IL
431940	67.175.7.224	CHICAGO	COOK	IL
431942	67.176.153.52	LAKE IN THE HILLS	MCHENRY	IL
431943	67.176.182.107	BLOOMINGTON	MCLEAN	IL
431944	67.184.1.244	LISLE	DUPAGE	IL
431945	67.184.166.20	ALGONQUIN	MCHENRY, KANE	IL
431946	67.184.177.95	CHICAGO	COOK	IL
431947	67.184.228.60	WEST DUNDEE	KANE	IL
431948	67.184.24.103	NORTH AURORA	KANE	IL

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431950	67.186.127.41	BOLINGBROOK	WILL, DUPAGE	IL
431951	67.186.83.184	ORLAND PARK	COOK	IL
431952	67.186.86.5	DANVILLE	VERMILION	IL
431953	67.186.92.192	CAROL STREAM	DUPAGE	IL
431954	68.51.99.159	ELGIN	KANE, COOK	IL
431955	68.57.197.175	NORRIDGE	COOK	IL
431956	68.57.219.140	CHICAGO	COOK	IL
431957	68.57.231.126	ROCKFORD	WINNEBAGO	IL
431958	68.57.233.25	CHICAGO	COOK	IL
431959	68.58.155.157	CHICAGO	COOK	IL
431960	68.58.68.84	ROCKFORD	WINNEBAGO	IL
431961	69.136.14.225	DECATUR	MACON	IL
431962	69.136.9.65	DECATUR	MACON	IL
431963	69.245.251.141	CHICAGO	COOK	IL
431964	69.246.215.8	WAUCONDA	LAKE	IL
431965	69.246.223.186	CRYSTAL LAKE	MCHENRY	IL
431966	71.194.120.21	PALATINE	COOK	IL
431967	71.194.120.232	PALATINE	COOK	IL
431968	71.194.185.170	CHICAGO	COOK	IL
431969	71.194.189.101	STREAMWOOD	COOK	IL
431970	71.194.248.8	NEW LENOX	WILL	IL
431971	71.194.47.68	NEW LENOX	WILL	IL
431972	71.194.6.203	AURORA	KANE, KENDALL, ETC	IL
431973	71.194.75.167	SCHILLER PARK	COOK	IL
431974	71.194.76.21	ROSELLE	DUPAGE, COOK	IL
431975	71.194.86.35	SKOKIE	COOK	IL
431977	71.201.196.162	CHICAGO	COOK	IL
431978	71.201.20.218	CHICAGO	COOK	IL
431979	71.201.200.210	BERWYN	COOK	IL
431981	71.201.225.111	BELLWOOD	COOK	IL
431982	71.201.240.10	ROMEVILLE	WILL	IL
431983	71.201.48.224	FOREST PARK	COOK	IL
431984	71.201.53.217	CHICAGO	COOK	IL
431985	71.201.68.61	CHICAGO	COOK	IL
431986	71.228.2.201	SPRING VALLEY	BUREAU	IL
431987	71.228.2.27	LA SALLE	LASALLE	IL
431988	71.228.23.118	NAPERVILLE	DUPAGE, WILL	IL
431989	71.228.23.45	NAPERVILLE	DUPAGE, WILL	IL
431990	71.229.73.180	BLOOMINGTON	MCLEAN	IL
431991	71.229.75.58	NORMAL	MCLEAN	IL
431992	71.239.129.20	WHEATON	DUPAGE	IL
431993	71.239.186.221	ZION	LAKE	IL
431994	71.239.187.67	GRAYSLAKE	LAKE	IL
431995	71.239.253.249	CHICAGO	COOK	IL
431996	71.239.27.180	CHICAGO	COOK	IL
431997	71.239.43.67	NEW LENOX	WILL	IL
431998	71.239.44.253	CHICAGO	COOK	IL
431999	71.239.55.92	HUNTLEY	MCHENRY, KANE	IL
432000	71.239.61.141	CHICAGO	COOK	IL
432001	71.239.90.45	GURNEE	LAKE	IL
432002	71.57.3.17	NAPERVILLE	DUPAGE, WILL	IL
432003	71.57.33.24	NILES	COOK	IL
432004	71.57.44.80	FRANKLIN PARK	COOK	IL
432006	71.57.63.157	JOLIET	WILL, KENDALL	IL
432007	71.57.92.76	ROSELLE	DUPAGE, COOK	IL
432008	75.150.227.205	ROSELLE	DUPAGE, COOK	IL
432009	76.16.1.11	DOWNERS GROVE	DUPAGE	IL
432012	76.16.189.233	EVERGREEN PARK	COOK	IL
432013	76.16.213.19	CHICAGO	COOK	IL
432014	76.16.243.52	SCHAUMBURG	DUPAGE	IL
432015	76.16.255.164	CHICAGO	COOK	IL

HIGHLIGHT = GEO-CODED RESULTS ONLY
 ALL OTHERS FROM ACCOUNT RECORDS

TICKET #	IP ADDRESS	CUSTOMER CITY	CUSTOMER COUNTY	CUSTOMER STATE
432016	76.23.65.126	CHICAGO	COOK	IL
432017	76.23.68.15	WAUKEGAN	LAKE	IL
432018	76.23.78.180	PEORIA	PEORIA	IL
432019	76.29.26.158	MORTON GROVE	COOK	IL
432020	76.29.32.36	CHICAGO	COOK	IL
432021	76.29.35.172	ANTIOCH	LAKE	IL
432022	76.29.36.240	CHICAGO	COOK	IL
432023	76.29.44.43	CHICAGO	COOK	IL
432024	76.29.53.56	PALATINE	COOK	IL
432025	76.29.63.21	PALATINE	COOK	IL
432026	76.29.79.47	CICERO	COOK	IL
432027	76.29.97.30	POSEN	COOK	IL
432028	98.193.110.119	PLAINFIELD	WILL, KENDALL	IL
432029	98.193.41.242	HUNTLEY	MCHENRY	IL
432030	98.193.9.222	WAUKEGAN	LAKE	IL
432031	98.206.106.234	OAK FOREST	COOK	IL
432032	98.206.11.227	GLENVIEW	COOK	IL
432033	98.206.118.16	MERRIONETTE PARK	COOK	IL
432034	98.206.198.204	CHICAGO	COOK	IL
432035	98.206.227.66	MOKENA	WILL	IL
432037	98.206.231.28	HINSDALE	DUPAGE	IL
432038	98.206.245.122	CHICAGO	COOK	IL
432039	98.206.38.123	CHICAGO	COOK	IL
432040	98.206.40.164	CHICAGO	COOK	IL
432041	98.206.44.107	CHICAGO	COOK	IL
432042	98.206.48.241	MCHENRY	MCHENRY	IL
432043	98.206.98.9	WARRENVILLE	DUPAGE	IL
432044	98.212.11.69	ROCKFORD	WINNEBAGO	IL
432045	98.212.135.39	URBANA	CHAMPAIGN	IL
432047	98.212.155.105	CHAMPAIGN	CHAMPAIGN	IL
432048	98.212.190.193	DES PLAINES	COOK	IL
432049	98.212.196.209	CHAMPAIGN	CHAMPAIGN	IL
432050	98.212.197.162	CHAMPAIGN	CHAMPAIGN	IL
432051	98.212.220.251	KEWANEE	HENRY	IL
432052	98.212.227.110	ROCKFORD	WINNEBAGO	IL
432053	98.212.36.159	BELVIDERE	BOONE	IL
432054	98.212.49.254			
432055	98.212.62.146	ROCKFORD	WINNEBAGO	IL
432056	98.213.105.3	SPRINGFIELD	SANGAMON	IL
432057	98.213.108.128	CHICAGO	COOK	IL
432058	98.213.127.203	ROCKFORD	WINNEBAGO	IL
432059	98.213.129.83	LOVES PARK	WINNEBAGO, BOONE	IL
432063	98.213.154.107	ROCKFORD	WINNEBAGO	IL
432064	98.213.161.246	CHICAGO	COOK	IL
432066	98.213.177.66	CHICAGO	COOK	IL
432067	98.213.182.122	CHICAGO	COOK	IL
432069	98.213.192.42	LOVES PARK	WINNEBAGO,BOONE	IL
432070	98.213.208.66	CHICAGO	COOK	IL
432071	98.213.210.20	CHICAGO	COOK	IL
432072	98.213.227.230	CHERRY VALLEY	WINNEBAGO, BOONE	IL
432073	98.213.232.172	JUSTICE	COOK	IL
432074	98.213.38.72	CHICAGO	COOK	IL
432075	98.213.47.27	HARWOOD HEIGHTS	COOK	IL
432076	98.213.51.85	WILMETTE	COOK	IL
432077	98.213.88.34	GLENWOOD	COOK	IL
432078	98.213.93.81	GLENWOOD	COOK	IL
432079	98.214.161.8	PEORIA	PEORIA	IL
432080	98.214.170.43	DUNLAP	PEORIA	IL
432082	98.214.217.213	DECATUR	MACON	IL
432083	98.215.116.187	BLOOMINGTON	MCLEAN	IL
432084	98.215.210.179	SPRINGFIELD	SANGAMON	IL
432085	98.215.212.122	SPRINGFIELD	SANGAMON	IL

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TICKET #	IP ADDRESS	CUSTOMER CITY	CUSTOMER COUNTY	CUSTOMER STATE
432086	98.215.224.142	CHICAGO	COOK	IL
432087	98.215.227.45	CHICAGO	COOK	IL
432088	98.215.249.197	SPRINGFIELD	SANGAMON	IL
432089	98.215.32.36	CHICAGO	COOK	IL
432090	98.215.35.193	CHICAGO	COOK	IL
432091	98.215.54.93	BLOOMINGTON	MCLEAN	IL
432092	98.215.77.122	CHICAGO	COOK	IL
432093	98.215.86.225	BLOOMINGTON	MCLEAN	IL
432096	98.222.132.14	CHAMPAIGN	CHAMPAIGN	IL
432097	98.222.55.252	URBANA	CHAMPAIGN	IL
432098	98.222.65.129	QUINCY	ADAMS	IL
432099	98.222.74.155	BARRINGTON	COOK	IL
432100	98.222.75.251	LAKE ZURICH	LAKE	IL
432101	98.222.90.191	PEORIA	PEORIA	IL
432102	98.223.10.117	BEACH PARK	LAKE	IL
432103	98.223.168.201	CHICAGO	LAKE	IL
432104	98.223.212.218	GLENDALE HEIGHTS	DUPAGE	IL
432105	98.223.3.225	HOFFMAN ESTATES	COOK,LASALLE	IL
432106	98.223.8.13	BEACH PARK	LAKE	IL
432107	98.223.8.234	ZION	LAKE	IL
432108	98.223.89.194	BLOOMINGTON	MCLEAN	IL
432112	98.226.118.15	ROCKFORD	WINNEBAGO	IL
432122	98.226.17.78	ORLAND HILLS	COOK	IL
432123	98.226.211.151	ELK GROVE VILLAGE	DUPAGE	IL
432124	98.226.68.25	BERWYN	COOK	IL
432125	98.227.107.209	CHICAGO	COOK	IL
432126	98.227.107.24	CHICAGO	COOK	IL
432127	98.227.110.118	CHICAGO	COOK	IL
432128	98.227.134.132	KANKAKEE	KANKAKEE	IL
432129	98.227.137.60	CARPENTERSVILLE	KANE	IL
432130	98.227.146.114	CARPENTERSVILLE	KANE	IL
432131	98.227.166.161	CALUMET CITY	COOK	IL
432132	98.227.220.235	GLENDALE HEIGHTS	DUPAGE	IL
432133	98.227.221.131	GLENDALE HEIGHTS	DUPAGE	IL
432134	98.227.240.143	MATTESON	COOK	IL
432135	98.227.36.247	DEKABL	DEKALB	IL
432136	98.227.93.145	RICHTON PARK	COOK	IL
432137	98.228.179.208	DEKALB	DEKALB	IL
432138	98.228.138.109	NAPERVILLE	DUPAGE, WILL	IL
432139	98.228.196.35	NILES	COOK	IL
432140	98.228.214.119	ARLINGTON HEIGHTS	COOK, LAKE	IL
432141	98.228.231.69	ARLINGTON HEIGHTS	COOK, LAKE	IL
432142	98.228.239.222	ARLINGTON HTS	CHAMPAIGN	IL
432143	98.228.50.64	CHAMPAIGN	CHAMPAIGN	IL
432144	98.228.245.111	SCHAUMBURG	DUPAGE	IL
432145	98.228.72.139	CHICAGO	COOK	IL
432146	98.228.73.51	CHICAGO	COOK	IL
432147	98.253.133.48	BURBANK	COOK	IL
432149	98.253.178.180	WEST CHICAGO	DUPAGE	IL
432150	98.253.188.21	CHICAGO	COOK	IL
432151	98.253.233.38	WILMETTE	COOK	IL
432152	98.253.39.234	WHEELING	COOK	IL

HIGHLIGHT = GEO-CODED RESULTS ONLY
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Morgan Pietz <morganpietz@gmail.com>

Urgent M&C Request on Guava v. Comcast - St. Clair County 12-MR-417

Morgan E. Pietz <mpietz@pietzlawfirm.com>

Thu, Feb 14, 2013 at 9:15 AM

To: Kevin Hoerner <kth@bphlaw.com>

Cc: "paduffy@wefightpiracy.com" <paduffy@wefightpiracy.com>, "johnsteele@gmail.com" <johnsteele@gmail.com>, "jlsteele@wefightpiracy.com" <jlsteele@wefightpiracy.com>, "lbeasley@ilmoattorneys.com" <lbeasley@ilmoattorneys.com>, "Thomas V. Leverso" <tvleverso@gmail.com>, Erin Russell <erin@russellfirmchicago.com>, "John D. Seiver" <johnseiver@dwt.com>, "atoennies@lashlybaer.com" <atoennies@lashlybaer.com>, "holly@ghalaw.com" <holly@ghalaw.com>, "acallahan@sakawys.com" <acallahan@sakawys.com>

Thanks, Kevin. Just to be clear then, you signed the pleading, and you are now re-confirming that it was correct: the person who verified the petition in this action is named "Alan Mony."

We will proceed on that basis then.

If you change your story later, after refusing to meet and confer on this now, I am going to have to no choice but to seek attorneys' fees.

Best regards,
Morgan

On Thu, Feb 14, 2013 at 8:32 AM, Kevin Hoerner <kth@bphlaw.com> wrote:

The issues have already been briefed. See you in court.

Kevin T. Hoerner

Attorney at Law

Becker, Paulson, Hoerner & Thompson, P.C.

5111 West Main Street

Belleville, Illinois 62226

Phone: 618.235.0020

From: morganpietz@gmail.com [mailto:morganpietz@gmail.com] **On Behalf Of** Morgan E. Pietz

Sent: Thursday, February 14, 2013 10:29 AM

To: paduffy@wefightpiracy.com; Kevin Hoerner; johnsteele@gmail.com; jlsteele@wefightpiracy.com

Cc: lbeasley@ilmoattorneys.com; Thomas V. Leverso; Erin Russell; John D. Seiver; atoennies@lashlybaer.com; holly@ghalaw.com; acallahan@sakawys.com

Subject: Urgent M&C Request on Guava v. Comcast - St. Clair County 12-MR-417

John, Paul, and Kevin,

In the interest of advancing the issues in this case, and ensuring that we don't have any more surprises at the hearing next week, I'd like to meet and confer with you on an important new issue in this case, stemming from your oppositions, on an expedited basis.

In Court yesterday, I asked Kevin if "Alan Moay" actually exists. That may seem like an unusual question to ask, but as you know, my experience with the mysterious "Alan Cooper" involved in your other lawsuits has conditioned me to be skeptical.

Kevin told me that someone did verify the petition in this case, but that there may have been some kind of typo on the name, but that he was not sure on the details.

Having now reviewed your opposition to Tom Leverso's motion (p. 5), I see that the new story is that the verification supposedly says "Alan Mony" not "Alan Moay." The verification sure looks like "Alan Moay" to me. Since it appears there may be a factual dispute about that point, I would ask you to bring the original with you to Court next week.

More importantly, the name "Alan Mony" rings a bell. I note that a man named "Allan Mooney" has previously been listed as the manager of MCGIP, LLC, one of Prenda's earlier shell company plaintiffs. I further note that the address for MCGIP, LLC is "care of" Alpha Law Group, the most recent affiliation for John's former (current?) law partner Paul Hansemeier, who is also the brother of Prenda's current preferred technical expert Pete Hansemeier. See the attached Minnesota Secretary of State business entity detail for MCGIP, LLC. Further, I note that a man with the name "Allen Mooney" is apparently involved in the online adult entertainment business, per the attached Adult Industry News article where Allan Mooney was selling the domain name <orgasms.com>. Finally, I note that one "Alan Mooney" is also a current client of Alpha Law / Paul Hansemeier, in *Mooney v. Priceline.Com Incorporated et al.*, No. 12-cv-02731-DWF-JSM (D. Minn. Oct. 26, 2012) (listing Paul Hansemeier of Alpha Law Firm LLC as attorney of record for plaintiff "Alan Mooney"). See the attached copy of the original Hennepin County complaint in that matter.

I further note that this is not the first time there have been questions about Prenda submitting bogus verifications (see Alan Cooper). For that matter, it is not the first time a supposed Prenda "client" has supposedly had trouble spelling their own name correctly on the signature line of a document where they swore to tell the truth under penalty of perjury (see Daniel Web[b]er in the *Sunlust* case, where I understand that the sanctions motions for both the initial fraud on the Court, and the subsequent fraudulent declaration trying to explain the first fraud, are still pending).

I note that unlike the other oppositions I received, which were supposedly signed by Paul Duffy, that in the opposition to Mr. Leverso's motion, which was the only one communicating the supposed new spelling for

your verifying client "Alan Momy", Kevin Hoerner signed, rather than counsel from Chicago. Perhaps this is to maintain plausible deniability so that when it turns out the person's name is really "Allan Mooney" you can blame it on a miscommunication over the phone? All of this just seems like a ploy to try and explain away that there are too many letters for "Allan Mooney" to be mistaken for "Alan Moay."

I would really like to believe that *this* case is not also a fraud, and that you are not attempting to cover up one lie with another (again). But like I said, experience has taught me to be skeptical where Prenda is concerned.

So, in light of all these facts, and in order to give you an opportunity, in good faith, to explain yourself prior to the hearing, I have two questions:

(1) What is the correct spelling of the name of the person who verified the petition, what is that person's address, and are "Allen Mooney" of MCGIP fame, and "Alan Moay/Momy" the verifying "client" here, the same person?

(2) Since you repeatedly note in the oppositions that your verification is legitimate because it is notarized, what is the name, state, registration number, and business address for the notary who supposedly witnessed Mr. Al[lan] Moay/Momy/Mooney sign the verification?

Note that these good faith meet and confer questions are separate and apart from the issue of whether it is appropriate for Tom to use a Rule 237 and OSC procedure to compel you to produce the affiant and notary to testify at an evidentiary hearing. For sure, we will get to that at the hearing next week.

I would like to incorporate and address your response on these questions into a combined reply, as courtesy to the Court. In order to give the Judge time to read everything, I plan to file the reply on Friday. Accordingly, I must insist that you get back to me by tonight (2/14). If this case is not a fraud, then you should have no problem providing this information, since I assume it must be readily at hand. And then just bring the original verification with you next week.

Please feel free to give me a call if you'd like to discuss.

Best regards,

Morgan

On Thu, Feb 7, 2013 at 2:33 PM, Morgan E. Pietz <mpietz@pietzlawfirm.com> wrote:

Paul,

As you know, since I served you with a copy, I filed a motion to quash in this case.

I have not seen any kind of a response to my motion, or to any of the other similar motions filed by the other attorneys representing other Does. Did you file a response? If you did, or if you are still planning on doing so, please make sure you serve me with a copy ASAP.

Best regards,
Morgan

P.S. Note that I could not find an email address for Earl Hubbs, who I understand is also counsel for another objecting John Doe. If anyone else has it, please forward this correspondence to him.

--

Morgan E. Pietz
THE PIETZ LAW FIRM
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Manhattan Beach, CA 90266
mpietz@pietzlawfirm.com
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FAX

Law Offices of Thomas V. Laverso 33 West Higgins Road, Suite 3080, South Barrington, IL 60019

2/15/2013

TO: Morgan Pietz

FAX: (310) 546-5301

PHONE: (310) 424-5557

FROM: Thomas Laverso

FAX: 630-627-1360

PHONE: 630-936-9902

PAGES: 18 (including this Cover)

RE: "Alan Mony"

CC: N/A

COMMENTS:

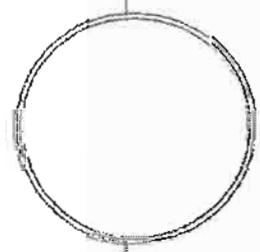
Morgan:

Our investigation was able to turn up an "Allan Mony" in Indiana with two letter "L's". His only alias/alternate spelling is the name "Allen" with the letter "E" and still two letter "L's".

Regards,

T.

- URGENT
- PLEASE COMMENT
- PLEASE REVIEW
- FOR YOUR RECORDS



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First: Mid: Last: City: State: Zip: Age:

Similar names: Alan Mony, Alan Mony, Alan Mony

Looking for A Mony? With USA People Search, you can find and reconnect with family, old friends, relatives just about anyone. We located A Mony in Portland, OR. Simply choose a record to get: current address, phone number, plus more detailed background information! Reports are instant!

Found 33 results for A Mony

For better results, please add a state

Name/AKAs	Age	Address	City	State	Phone	Possible Relatives
<u>MONY, ANITHE</u> Associated names: ANITHE, MONY	35	PORTLAND, OR SEATTLE, WA			✓	<u>MONY, ANNE</u> (age 32) <u>MONY, LOUIS, CLERES</u> (age 28) <u>TIERRE, ROSSBERRY, M</u>
<u>MONY, ANIKA, A</u> Associated names: MEYERS, ANKA ANNE	37	PLAINWELL, MI GALESBURG, MI KALAMAZOO, MI			✓	<u>MEYERS, MATTHEW, LEE</u> (age 28) <u>MONY, ANTHONY WILLIAM CHARLES</u> (age 34) <u>MONY, KRISTINA, ELIZABETH</u> (age 43) <u>See all relatives...</u>
<u>MONY, ADITYA</u>	39	TRENTON, NJ FALLS CHURCH, VA PLAINSBORO, NJ DEVON, PA PRINCETON JCT, NJ NEW PROVIDENCE, NJ OREM, UT BRIDGEPORT, CT OKLAHOMA CITY, OK HOUSTON, TX			✓	<u>MONY, NEERJA, A</u>
<u>MONY, ANTHONY W</u>	25	PLAINWELL, MI KALAMAZOO, MI GALESBURG, MI BRONX, NY			✓	
<u>MONY, A J F</u>	64	GAINESVILLE, FL CLEARWATER, FL				<u>MONY, ANGELA</u> <u>MONY, FREDERICK</u>
<u>MONY, ALLAN B</u> Associated names: ALLEN, MONY	68	BRAZIL, IN			✓	<u>HARTY, SALLY J</u> (age 54)
<u>MONY, ASHA</u> Associated names: SMY, ASHA PARAMEDICARAKA (YONY)	40	TUCSON, AZ CANTON, MI MADISON HEIGHTS, MI WESTLAND, MI			✓	
<u>MONY, AIMAN, JUDGE</u> Associated names: QADY, AIMAN S AIMAN, AL QUADY QADY, AMRAN S ALQADY, A MOUSTAFA, AIGEN S QADY, AKBER S	49	DURBUQUE, IA NAPEVILLE, IL CAROL STREAM, IL ROLLING MEADOWS, IL			✓	
<u>MONY, ANGELA</u>		GAINESVILLE, FL CLEARWATER, FL				<u>MONY, A J F</u> (age 64) <u>MONY, FREDERICK</u>
<u>MONY, ANITHE</u>	41	PORTLAND, OR SEATTLE, WA				<u>MONY, HERBERT</u>
<u>MONY, ALEXANDER B</u>	23	LONG BEACH, CA SIGNAL HILL, CA				
<u>MONY, ANNE, MARILIA</u>		SEATTLE, WA				
<u>MONY, ASOMA</u>	31	MIAMI, OK				
<u>MONY, ANITHA</u>	36	HONOLULU, HI SANTA MARIA, CA				
<u>MONY, ANSY</u>	164					

Results for Alan Mony

16.	MONY, ABERGEL		NEWYORK, NY	✓	VIEW PROFILE
17.	MONY, ALY		LONG BEACH, CA	✓	VIEW PROFILE
18.	MONY, ABRAHAM		HALETHORPE, MD		VIEW PROFILE
19.	MONY, AMY		WORCESTER, MA	✓	VIEW PROFILE
20.	MONY, ANTHONY		ALEXANDRIA, VA	✓	VIEW PROFILE
21.	MONY, ANDRE		MIAMI, FL	✓	VIEW PROFILE
22.	MONY, ABOITE		BRADEN RIVER, FL	✓	VIEW PROFILE
23.	MONY, ABCYD		APACHE JUNCTION, AZ		VIEW PROFILE
24.	MONY, ARTIS J	75	DALLAS, TX	✓	VIEW PROFILE
	Associated names: J MONY A				
25.	MONY, ANITHA	45	KAPGLE, IN		VIEW PROFILE
26.	MONY, ANITHE	41	SEATTLE, WA		VIEW PROFILE
27.	MONY, AMANDA		WEST BLOOMFIELD, MI		VIEW PROFILE
28.	MONY, ANTHONY		PLAINWELL, MI	✓	VIEW PROFILE
29.	MONY, ANTHONY		PLAINWELL, MI	✓	VIEW PROFILE
30.	MONY, ANTHONY	41	PLAINWELL, MI	✓	VIEW PROFILE
31.	MONY, ALEX	41	PHILADELPHIA, PA		VIEW PROFILE
32.	MONY, ALEX	40	PHILADELPHIA, PA		VIEW PROFILE
33.	MONY, ANN		LAS VEGAS, NV	✓	VIEW PROFILE

First: Alan Mid: Last: Mony City: State: All States Zip: Age: [VIEW PROFILE](#)

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First: Alan Mid: Last: Many City: phoenix State: Arizona Zip: Age:

Similar names: Alan Many, Alan Many 2, Alan

Looking for A Many? With USA People Search, you can find and reconnect with family, old friends, relatives just about anyone! We located A Many in Tucson, AZ. Simply choose a record to get current address, phone number, plus more detailed background information! Reports are instant!

Found 2 results for A Many AZ:

Rank	Name	Age	Address, City, State	Phone	Background
1	MONEY, ASHA Associated names: MANY ASHK PA JAMES YARAN MONY		TUCSON, AZ CANTON, MI MADISON HEIGHTS, MI WESTLAND, MI		Background
2	MONEY, ABCYD		APACHE JUNCTION, AZ		Background

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First: |
 Middle: |
 Last: |
 City: |
 State: |
 Zip: |
 Age:

Similar names: [Alan Mony](#) [Alan Mony](#) [Alan Mony](#)

Looking for A Mony? With USA People Search, you can find and reconnect with family, old friends, relatives just about anyone! We located A Mony in Dubuque, IA. Simply choose a record to get current address, phone number, plus more detailed background information! Reports are instant!

Found 2 results for A Mony II.

Rank	Name	Age	Address (City, State)	Phone	Possible Products
1.	MONY, AIMAN JUDGE	46	DUBUQUE, IA NAPERVILLE, IL CAROL STREAM, IL ROLLING MEADOWS, IL	417	ELDACY, IBRAHIM
2.	MONY, ACHARYA		OLENVIEW, IL	618	ELDACY, IBRAHIM

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First	Middle	Last	City	State	Zip	Age
Alan		Mony	chicago	Illinois		36-46-56-64

Similar names: [Alan Mony](#), [Alan Mony](#), [Al Mony](#)

Looking for A Mony? With USA People Search, you can find and reconnect with family, old friends, relatives just about anyone! We located A Mony in Dubuque, IA. Simply choose a record to get current address, phone number, plus more detailed background information! Reports are instant!

Found 2 results for A Mony II

Name/IDs	Age	Address, City, State	Phone	Residence Status
1. MONY, AÍMAN JUDGE Associated names: AÍMAN, AL QJADY QADY, AÍMAN S QADY, AÍMAN S QADY, AÍMAM S ALQADY, A MOUSTAPA, AÍMAN S	49	DUBUQUE, IA NAPERVILLE, IL CAROL STREAM, IL ROLLING MEADOWS, IL	✓	ALQADY, IBRAHIM
2. MONY, ACHARYA		GLENVIEW, IL	✓	

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First:
 Middle:
 Last:
 City:
 State:
 Zip:
 Age:

Similar names: Alan Mony, Alan Mony, A Mony

Looking for A Mony? With USA People Search, you can find and reconnect with family, old friends, relatives just about anyone! We located A Mony in Portland, OR. Simply choose a record to get current address, phone number plus more detailed background information! Reports are instant!

Found 30 results for A Mony:

Rank	Name	Age	Address, City, State	Phone	Possible Relatives
1	MONY, ANTIETHE Associated names: ANTIETHE, MONY	41	PORTLAND, OR SEATTLE, WA	✓	MONY, ANNE (age 39) MONY, HERARD MONY, LOUIS DICERES (age 20) see all relatives
2	MONY, ANIKA, A Associated names: MEYERS, ANIKA ANNE	37	PLAINWELL, MI GALESBURG, MI KALAMAZOO, MI	✓	MEYERS, MATTHEW LEE (age 38) MONY, ANTHONY WILLIAM CHARLES (age 32) MONY, KRISTINA SUZANETTE (age 41) see all relatives
3	MONY, ADITYA	39	TRENTON, NJ FALLS CHURCH, VA PLAINSBORO, NJ DEVON, PA PRINCETON JCT, NJ NEW PROVIDENCE, NJ CREM, UT BRIDGEPORT, CT OKLAHOMA CITY, OK HOUSTON, TX	✓	MONY, HEERJA, A
4	MONY, ANTHONY, W	35	PLAINWELL, MI KALAMAZOO, MI GALESBURG, MI BRONX, NY	✓	
5	MONY, AJ, F	54	GAINESVILLE, FL CLEARWATER, FL		MONY, ANGELA MONY, FREDERICK
6	MONY, ALLAN, B Associated names: ALLEN, MONY	58	BRAZIL, IN	✓	HARTY, SALLY, J (age 59)
7	MONY, ASHA Associated names: MANY, AS-A PARAMESWARAN, MONY	40	TUCSON, AZ DANTON, MI MADISON HEIGHTS, MI WESTLAND, MI	✓	
8	MONY, AIMAN, JUDGE Associated names: OADY, AIMA S AIMAN, AL JUDAY OADY, AIMA S A, OADY, A MCUSTAF, AIMA S OADY, AIMEMS	49	DUBUQUE, IA NAFENVILLE, IL CAROL STREAM, IL ROLLING MEADOWS, IL	✓	
9	MONY, ANGELA		GAINESVILLE, FL CLEARWATER, FL		MONY, AJ, F (age 54) MONY, FREDERICK
10	MONY, ALEXANDER, B	28	LONG BEACH, CA SIGNAL HILL, CA		
11	MONY, ANNE, MARILIA		SEATTLE, WA		
12	MONY, ASOMA	34	MAMI, OK		
13	MONY, ANITHA	35	HONOLULU, HI SANTA MARIA, CA		
14	MONY, ANSY	104			
15	MONY, ABERGEL		NEW YORK, NY	✓	
16	MONY, ALY		LONG BEACH, CA	✓	

Results for Alan Mony Minneapolis Mn

17	<u>MONY, ABRAHAM</u>		HALETHORPE, MD		
18	<u>MONY, AMY</u>		WORCESTER, MA		
19	<u>MONY, ANTHONY</u>		ALEXANDRIA, VA		
20	<u>MONY, ANDRE</u>		MIAMI, FL		
21	<u>MONY, ABOITE</u>		BRADEN RIVER, FL		
22	<u>MONY, ABCYD</u>		APACHE JUNCTION, AZ		
23	<u>MONY, ARTIS, J</u>	75	DALLAS, TX		
	Associated names: J. MONY, A				
24	<u>MONY, ANITHA</u>	45	KAPOLEI, HI		
25	<u>MONY, AMANDA</u>		WEST BLOOMFIELD, MI		
26	<u>MONY, ANTHONY</u>		PLAINWELL, NJ		
27	<u>MONY, ANTHONY</u>	41	PLAINWELL, NJ		
28	<u>MONY, ALEX</u>	41	PHILADELPHIA, PA		
29	<u>MONY, ALEX</u>	40	PHILADELPHIA, PA		
30	<u>MONY, ANN</u>		LAS VEGAS, NV		

First: Alan Mid: Last: Mony City: minneapolis State: Minnesota Zip: Age:

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Search results for Alan Momy in Chicago, IL

Narrow your results by: Middle Initial: Age: Previous City: Filter

We found 16 people that match your search.

1. Vijay K Momy, age 60 [Get more details](#)

Name/Address	City/State	Employer	Education	Spouse	DOB	Phone	Address
Vijay K Momy Vijay Momy	Chicago, IL Troy, MI New York, NY East Lansing, MI Dearborn, MI Fremont, CA	Avarex/Marsal Ally Financial Inc Gemsky GMAC Financial Services Centerus Capital Management Accenture View All		Kishimya Momy Jaha Momy			

2. Sarcu Momy, age 56 [Get more details](#)

Name/Address	City/State	Employer	Education	Spouse	DOB	Phone	Address
Sarcu Momy Momy Sarcu	Clenshaw, IL Aurora, IL Joliet, IL Naperville, IL Des Plaines, IL	Joel Medical Group Ltd Silver Cross Medical WJ City Medical SC WJ County Medical Medien Medical	Loyola Stritch School of MD University of Illinois at Chicago and Loyalis Stritch School of MD	Corey Sarcu Laura Merans Linda Sarcu Loise Sarcu Nancy Merans			

3. Hing Momy, age 44 [Get more details](#)

Name/Address	City/State	Employer	Education	Spouse	DOB	Phone	Address
Hing Momy Momy May Hing Momy H Hing	West Chicago, IL Yorkville, IL Naperville, IL Yorkville, IL View All	Next Case Software Architects Inc Walgreens	Northern Illinois University Indiana University Purdue University at Indianapolis	Jessica Hing Vander Hing Rita Hing Corey Hing Kimberly Hing Ruth Hing			

4. Kristina Elizabeth Momy, age 41 [Get more details](#)

Name/Address	City/State	Employer	Education	Spouse	DOB	Phone	Address
Kristina Elizabeth Momy	Springfield, IL Bloomington Hills, MI Kalamazoo, MI Caledonia, MI	Griff Winning Collier Bookers Cotton Bookers LLC Special Assistant Illinois	Wayne State University Leah Scholtz Kalamazoo College	Anika Momy Marie Momy			

5. Lim Momy [Get more details](#)

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Name/Address	Has friends	Has work info	Has studied at	Related to	DOB	Phone	Address
Lim Meny	Seahambug, IL Seattle, WA	AD&DC					

6. **Chelsey Meny** [Get more details](#)

Name/Address	Has friends	Has work info	Has studied at	Related to	DOB	Phone	Address
Chelsey Meny	Chicago, IL Las Vegas, NV	Modern Physician		Steven Meny			

7. **Vinod M Meny, age 38** [Get more details](#)

Name/Address	Has friends	Has work info	Has studied at	Related to	DOB	Phone	Address
Vinod M Meny	Westmont, IL Joliet, IL Hug, IL Parsippany, NJ Long Beach, CA						

8. **Premalatha Meny, age 39** [Get more details](#)

Name/Address	Has friends	Has work info	Has studied at	Related to	DOB	Phone	Address
Premalatha Meny Premalatha Viggins	Lombard, IL Fairfield, IA Indianola, IA Darien, VA			John Wiggins Jean Wiggins James Viggins			

9. **Vidya Krish Meny, age 30** [Get more details](#)

Name/Address	Has friends	Has work info	Has studied at	Related to	DOB	Phone	Address
Vidya Krish Meny	Lombard, IL Troy, MI Ann Arbor, MI			Krishanvi Meny Usha Meny Vidya Meny			

10. **Sophan T Meny, age 45** [Get more details](#)

Name/Address	Has friends	Has work info	Has studied at	Related to	DOB	Phone	Address
Sophan T Meny	Chicago, IL Evanston, IL Providence, RI						

11. **Sreedevi Meny** [Get more details](#)

Name/Address	Has friends	Has work info	Has studied at	Related to	DOB	Phone	Address
Sreedevi Meny	Chicago, IL						

12. **Mangesh Meny** [Get more details](#)

Name/Address	Has friends	Has work info	Has studied at	Related to	DOB	Phone	Address
Mangesh Meny Mangesh Sopan Mangesh	Burlingame, CA IL						

13.		Barbara Meny	Get more details
The address for Barbara Meny is 1000 N. ...			
Home Address	Age Range	Married	Age Group
Barbara Meny	Medora, IL		
14.		Premalatha Meny	Get more details
The address for Premalatha Meny is 1000 N. ...			
Home Address	Age Range	Married	Age Group
Premalatha Meny	Winfield, IL		
15.		Judge Aman Meny	Get more details
The address for Judge Aman Meny is 1000 N. ...			
Home Address	Age Range	Married	Age Group
Judge Aman Meny	Carol Stream, IL		
16.		Bunni Meny	Get more details
The address for Bunni Meny is 1000 N. ...			
Home Address	Age Range	Married	Age Group
Bunni Meny Meny Bunni	Morris Prospect, IL		Debra (Jill) Mounette Bunn Jami Bunn

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- Alan Meny

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Alan		Meny	Chicago, IL	

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Search results for Alan Mony in Arizona

We found Asha Mony

Address History	Aliases	Relatives	Worked at	Asha Mony
Tucson, AZ Cortez, NJ Madison Heights, MI Westland, MI	Mony, Asha Paramerwahan	Shreekan Rajaraman	Compuware	Tucson, AZ

Get more information you need on Asha Mony.

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- Alan Mony
- Asha Mony
- Alan Mony
- Asha Mony
- Alan Mony

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Alan	Mony	AZ	<input type="button" value="Search"/>

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Search results for Alan Mory in Belleville, IL

Narrow your results by: Middle initial: Age: Previous City:

We found 16 people that match your search.

1. **Vijay K Mory**, age 60 [Get more details](#)

Name/Address	Resided in	Education at	Employed at	Related to	DOB	Sex	Address
Vijay K Mory Vijay Mory	Chicago, IL Troy, MI New York, NY East Lansing, MI Dearborn, MI Fremont, CA	Averez Mui 221 Aly Francis Inc Formerly GMAC Financial Sanyo Inc Cerberus Capital Wargemore Accenture Yahoo!		Krishnaya Mory Uma Mory			

2. **Saroo Mory**, age 56 [Get more details](#)

Name/Address	Resided in	Education at	Employed at	Related to	DOB	Sex	Address
Saroo Mory Mory Saroo	Channah, IL Aurora, IL Joliet, IL Naperville, IL Des Plaines, IL	Lake Medical Group Ltd Shen Cross Medical Mill City Medical CO Mill County Medical Madison Medical	Loyola Stritch School of MD University of Illinois at Chicago and Loydas Stritch School of MD	Corey Saroo Lynn Merens Linda Saroo Loren Saroo Barbar Merens			

3. **Hing Mory**, age 44 [Get more details](#)

Name/Address	Resided in	Education at	Employed at	Related to	DOB	Sex	Address
Hing Mory Mory Hing Mory Mory Hing	West Chicago, IL Yorkville, IL Naperville, IL Warrenville, IL View All	Solar Gas Software Architects Inc Walgreens	Northern Illinois University Iudana University Purdue University of Indianapolis	Jessica Hing Yandeh Hing Bing Hing Corey Hing Kimberly Mory Rita Mory			

4. **Kristina Elizabeth Mory**, age 41 [Get more details](#)

Name/Address	Resided in	Education at	Employed at	Related to	DOB	Sex	Address
Kristina Elizabeth Mory	Springfield, IL Bloomfield Hills, MI Kalamazoo, MI Searsburg, MI	Griffith Winn (g) Cohen Essexville Cowan Builders LLC Special Assistant Manager	Wayne State University Law School Kalamazoo College	Anika Mory Marie Mory			

5. **Jim Mory** [Get more details](#)

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Name/Address	Has Profile	Has Worked At	Has Married At	Related To	DOB	Phone	Address
Lim Mory	Yes	ADHOC					

6. **Chelsey Mory** [Get more details](#)

This person has been associated with the following companies:

Name/Address	Has Profile	Has Worked At	Has Married At	Related To	DOB	Phone	Address
Chelsey Mory	Yes	Modern Properties		Steven Mory			

7. **Vinod M Mory , age 38** [Get more details](#)

This person has been associated with the following companies:

Name/Address	Has Profile	Has Worked At	Has Married At	Related To	DOB	Phone	Address
Vinod M Mory	Yes	Investment IL Arlington Heights IL Parsippany NJ Long Branch NJ Newark					

8. **Premalatha Mory , age 39** [Get more details](#)

This person has been associated with the following companies:

Name/Address	Has Profile	Has Worked At	Has Married At	Related To	DOB	Phone	Address
Premalatha Mory Premalatha Wiggins	Yes	Lombard IL Fairfield IA Indianola IA Centerville IA		John Wiggins Jean Wiggins James Wiggins			

9. **Vidya Krish Mory , age 30** [Get more details](#)

This person has been associated with the following companies:

Name/Address	Has Profile	Has Worked At	Has Married At	Related To	DOB	Phone	Address
Vidya Krish Mory	Yes	Lombard IL Troy MI Ann Arbor MI		Krishnayer Mory Usha Mory Vijay Mory			

10. **Sophan T Mory , age 48** [Get more details](#)

This person has been associated with the following companies:

Name/Address	Has Profile	Has Worked At	Has Married At	Related To	DOB	Phone	Address
Sophan T Mory	Yes	Chicago IL Bolingbrook IL Providence RI					

11. **Sreedevi Mory** [Get more details](#)

This person has been associated with the following companies:

Name/Address	Has Profile	Has Worked At	Has Married At	Related To	DOB	Phone	Address
Sreedevi Mory	Yes	Chicago IL					

12. **Mangesh Mory** [Get more details](#)

This person has been associated with the following companies:

Name/Address	Has Profile	Has Worked At	Has Married At	Related To	DOB	Phone	Address
Mangesh Mory Mangesh Bagan Madhe	Yes	Buffalo Grove IL					

13. **Barbara Momy** [Get more details](#)

First Name	Last Name	Address	City / State	Phone	DOB	Age	Address
Barbara Momy	Momy	Medora, IL					

14. **Premalatha Momy** [Get more details](#)

First Name	Last Name	Address	City / State	Phone	DOB	Age	Address
Premalatha Momy	Momy	Winfield, IL					

15. **Judge Aiman Momy** [Get more details](#)

First Name	Last Name	Address	City / State	Phone	DOB	Age	Address
Judge Aiman Momy	Momy	Carol Stream, IL					

16. **Bunni Momy** [Get more details](#)

First Name	Last Name	Address	City / State	Phone	DOB	Age	Address
Bunni Momy	Momy	Mount Prospect, IL					

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- Al Momy
- Alan Momy
- Paul Momy
- Alan Momy
- Ben Momy
- A Momy

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First Name	MI	Last Name	City / State	Search
Alan		Momy	Belleville, IL	Search

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Portsmouth, VA

Ayrin Lamony
Portsmouth, VA

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Get a Report on Ayrin Lamony



Related People Searches

- A. Momy
- Aan Momy
- Am Momy
- Alan Momy
- Alan Momy
- Alice

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Alan		Momy	United States	Search

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