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IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

INGENUITY 13 LLC,

Plaintiff,

v.

JOHN DOE,

Defendant.

Case No. 2:12-cv-8333-ODW(JCx)

**DECLARATION OF CAMILLE D.  
KERR**

I, Camille D. Kerr, hereby declare as follows:

1. I am a paralegal with Locke Lord LLP, a law firm serving as outside counsel for SBC Internet Services, LLC d/b/a AT&T Internet Services (“AT&T”) in connection with numerous subpoenas issued by attorneys with Prenda Law, Inc. in various state and federal courts across the nation. I regularly assist Bart Huffman in such matters.

2. On November 1, 2012, I received an e-mail message from Angela Van Den Hemel, whom I believe to be a paralegal with Prenda Law Inc., wherein Ms. Van Den Hemel requested an update with respect to a subpoena to AT&T issued in *AF Holdings LLC v. John Doe*, No. 12-cv-05725 (C.D. Cal.) (the “Subpoena to AT&T” issued in the “5725 Lawsuit”). Ms. Van Den Hemel’s e-mail message to me attached a copy of the corresponding subpoena package, consisting of a cover letter, the July 11, 2012 Order Granting Plaintiff’s *Ex Parte* Application for Leave to Take Expedited Discovery, and the Subpoena to AT&T with proof of service. A true and correct copy of Ms. Van Den Hemel’s e-mail message to me (including its attachments) is attached hereto as Exhibit 1.

1           3.       On November 6, 2012, Angela Van Den Hemel sent another e-mail message  
2 to me asking about the 5725 Lawsuit and the Subpoena to AT&T. A true and correct copy  
3 of that e-mail message is attached hereto as Exhibit 2.

4           4.       On November 8, 2012, I was copied on an e-mail message from Bart  
5 Huffman to Ms. Van Den Hemel concerning the 5725 Lawsuit, in which Mr. Huffman  
6 stated, "Upon review of the court files, it appears that any early discovery orders in this case  
7 (and a number of other AF Holdings cases) were vacated. Please let us know if you have  
8 information to the contrary." (Huffman Decl., ¶ 9 and Ex. 4.) I have not thereafter received  
9 any information or communication from Prenda Law, Inc. concerning the Subpoena to  
10 AT&T or the 5725 Lawsuit.

11           5.       I declare under penalty of perjury that the above is true and correct.

12 Dated: February 19, 2013

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15 Camille D. Kerr  
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