

February 25, 2013

Via Hand Delivery

***Re: Prenda Law, Inc. v. Paul A. Godfreed, Alan Cooper and Does 1-10
13-L-75
Emergency Request for Production of Documents***

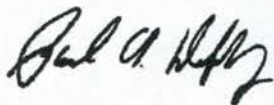
Dear Custodian of Records:

Enclosed, please find a subpoena issued in the above-referenced matter, which is currently pending in the Circuit Court of the Twentieth Judicial Circuit St. Clair County, Illinois. Our client is requesting all Internet Protocol addresses (including the date and time of that access in Universal Coordinated Time) that accessed the blogs located at dietrolldie.com and fightcopyrighttrolls.com between January 1, 2011 through the present. Please provide this information in an Excel spreadsheet.

Due to the emergency nature of the requested information, it is imperative that your organization responds to the subpoena immediately. The requested information is perishable and vital to the claims asserted in a complaint alleging widespread and systematic defamation. A copy of this complaint is attached for your reference.

If you have any other questions or concerns regarding this request, please contact us immediately at (321) 880-9160. We will do everything in our power to minimize the burden imposed on your organization associated with our request.

Sincerely,



Paul A. Duffy, Esq.
161 N. Clark St. Ste. 3200
Chicago, IL 60601
paduffy@wefightpiracy.com

PLAINTIFF/PETITIONER: Prenda Law, Inc	CASE NUMBER:
DEFENDANT/RESPONDENT: Paul A. Godfread, Alan Cooper and Does 1-10	13-L-75

The production of the documents, electronically stored information, or other things sought by the subpoena on page one is supported by (check one):

- the attached affidavit or the following declaration:

DECLARATION IN SUPPORT OF CIVIL SUBPOENA (DUCES TECUM) FOR PERSONAL APPEARANCE AND PRODUCTION OF DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND THINGS AT TRIAL OR HEARING (Code Civ. Proc., §§ 1985,1987.5)

1. I, the undersigned, declare I am the plaintiff defendant petitioner respondent
 attorney for (specify): Plaintiff other (specify):
in the above-entitled action.

2. The witness has possession or control of the documents, electronically stored information, or other things listed below, and shall produce them at the time and place specified in the Civil Subpoena for Personal Appearance and Production of Records at Trial or Hearing on page one of this form (specify the exact documents or other things to be produce; if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified):

All Internet Protocol addresses (including the date and time of that access in Universal Coordinated Time) that accessed the blogs located at dietrolldie.com and fightcopyrighttrolls.com between January 1, 2011 through the present. Please provide this information in an Excel spreadsheet.

Continued on Attachment 2.

3. Good cause exists for the production of the documents, electronically stored information, or other things described in paragraph 2 for the following reasons:

The requested documents are relevant to the claims of the Complaint, are necessary for identifying the defendants, and will likely lead to discoverable information.

Continued on Attachment 3.

4. The documents, electronically stored information, or other things described in paragraph 2 are material to the issues involved in this case for the following reasons:

The requested documents are relevant to the claims of the Complaint, are necessary for identifying the defendants, and will likely lead to discoverable information.

Continued on Attachment 4.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 02/22/2013

Paul A. Duffy

(TYPE OR PRINT NAME)

(SIGNATURE OF

SUBPOENAING PARTY

ATTORNEY FOR
SUBPOENAING PARTY)

Request for Accommodations

Assistive listening systems, computer-assisted real-time captioning, or sign language interpreter services are available if you ask at least five days before the date on which you are to appear. Contact the clerk's office or go to www.courts.ca.gov/forms for Request for Accommodations by Persons With Disabilities and Response (form MC-410). (Civil Code, § 54.8.)



(Proof of service on page 3)

PLAINTIFF/PETITIONER: Prenda Law, Inc	CASE NUMBER: 13-L-75
DEFENDANT/RESPONDENT: Paul A. Godfread, Alan Cooper and Does 1-10	

PROOF OF SERVICE OF CIVIL SUBPOENA (DUCES TECUM) for Personal Appearance and Production of Documents, Electronically Stored Information, and Things at Trial or Hearing and DECLARATION

1. I served this *Civil Subpoena (Duces Tecum) for Personal Appearance and Production of Documents, Electronically Stored Information, and Things at Trial or Hearing and Declaration* by personally delivering a copy to the person served as follows:

- a. Person served (name):
- b. Address where served:
- c. Date of delivery:
- d. Time of delivery:
- e. Witness fees (check one):
 - (1) were offered or demanded and paid. Amount: \$ _____
 - (2) were not demanded or paid.
- f. Fee for service: \$ _____

2. I received this subpoena for service on (date):

3. Person serving:

- a. Not a registered California process server.
- b. California sheriff or marshal.
- c. Registered California process server.
- d. Employee or independent contractor of a registered California process server.
- e. Exempt from registration under Business and Professions Code section 22350(b).
- f. Registered professional photocopier.
- g. Exempt from registration under Business and Professions Code section 22451.
- h. Name, address, telephone number, and, if applicable, county of registration and number:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

(For California sheriff or marshal use only)
I certify that the foregoing is true and correct.

Date:

Date:

▶ _____
(SIGNATURE)

▶ _____
(SIGNATURE)

SHORT TITLE: List of Attorneys of Record and Parties Not Represented by Counsel	CASE NUMBER: 13-L-75
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ATTACHMENT (Number): 1*(This Attachment may be used with any Judicial Council form.)*

Paul Duffy
Prenda Law Inc.
161 N. Clark St. Ste. 3200
Chicago, IL 60601
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Paul A. Godfread
1077 Wakefield Ave
St. Paul, MN 55106
1-612-284-7325

Alan Cooper
2170 HWY 47 N
Isle, MN 56342

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 1 of 1*(Add pages as required)*

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

PRENDA LAW, INC.

Plaintiff,

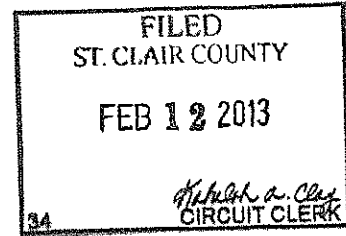
v.

PAUL GODFREAD, ALAN COOPER
and JOHN DOES I-10,

Defendants.

No. 13-L-

75



COMPLAINT

Plaintiff, Prenda Law, Inc., through its undersigned counsel, hereby files this Complaint requesting damages and other relief, and alleges as follows:

NATURE OF THE ACTION

1. Plaintiff files this action seeking monetary damages, injunctive relief and other damages arising from the egregious Internet-based conduct of a number of individuals, whom Plaintiff knows only by the anonymous, salacious, false and libelous comments they have made, and continue to make, about it on the Internet. Shielded by unconventional pseudonyms, the two named Defendants and the Doe Defendants belong to a community of Internet "commentators," fearful of being identified, and have falsely accused Plaintiff of, among other things, criminal offenses; want of integrity in the discharge of employment; lack of ability in its profession; and the commission of fornication and adultery.

2. The Defendants' defamatory statements are made under the most cowardly of circumstances: plastered over centralized Internet communities and available to anyone in the world with an Internet connection. The Defendants have libeled Plaintiff under the disguise of such childish and unsophisticated pseudonyms as "die troll die." Sheltered in a cloak of cowardly

pseudonyms, Defendants have continued unabated in their conduct, falsely accusing Plaintiff of many things with the stated intention of harming its business, harming its relationships with clients, and harming the public reputation of anyone performing work on behalf of Plaintiff.

3. Defendants have published copious volumes of such false statements to many third parties, theoretically extending to every person on Earth through the Internet. Their false statements constitute libel *per se*, and are actionable without proof of special damages. Their conduct also makes them liable to Plaintiff on several theories of tort liability, including false lights and intentional interference with actual and prospective business relationships, as well as conspiracy to commit those torts.

4. Plaintiff brings this action to force Defendants out of their hiding places, to expose the “writers” to the light of day, to enjoin their continued tortious conduct against Plaintiff and its agents, and to recover the substantial damages that they have caused Plaintiff.

THE PARTIES

5. Plaintiff is a corporation organized and existing under the laws of the State of Illinois, with its principal place of business located in Chicago, Illinois. Plaintiff in a short amount of time since its formation in 2011 has become one of the largest and most successful copyright infringement firms in the Nation.

6. Defendant Paul Godfread is an attorney who, upon information and belief, practices at 100 S. Fifth Street, Suite 1900, Minneapolis, Minnesota. Defendant Godfread is a major contributor and participant in the Internet community that is the primary source of the defamatory statements described herein. Defendant Godfread has made both written and oral statements to Plaintiff and its agents that are libelous and slanderous with respect to Plaintiff. Plaintiff has observed that those statements have appeared, or been incorporated, in comments on

the Internet sites referenced herein. Among other things, Defendant Godfread has falsely accused Plaintiff both verbally and in writing of committing crimes, fraud and other matters that, when he wrote and published them to third parties, constitute defamation *per se*. Upon information and belief, and based upon the fact that statements Godfread has made to Prenda have appeared in substantially the same form in Internet postings that are libelous to Plaintiff and referenced herein, Godfread is a participant in the community of anonymous Internet posters who have defamed and committed other tortious acts against Plaintiff. Furthermore, Godfread has made allegations in a complaint filed in the District Court for the Fourth Judicial District of Minnesota that are patently false. Yet, certain false and defamatory statements from that Complaint appeared on Internet sites referenced herein long before the Complaint was ever a matter of public record. As a consequence, and upon information and belief, Godfread published false and defamatory statements about Plaintiff to members of the community referenced herein, long before his Complaint was ever a matter of public record. As such, the statements, made outside of any valid legal proceeding, are not subject to immunity from liability that otherwise attaches to statements in Court documents.

7. Defendant Alan Cooper is an individual residing in Mille Lacs County, Minnesota. Defendant Cooper is a client of Defendant Godfread. Godfread represented to Plaintiff that certain of the false and defamatory statements referenced in Paragraph 6 derived from information provided to him by Cooper. As such, Cooper's false statements, when published to third parties, constitute defamation *per se*. Upon information and belief, and based upon the fact that false statements about Prenda attributed to Cooper have appeared in substantially the same form in Internet postings that are libelous to Plaintiff and referenced

herein, Cooper is a participant in the community of anonymous Internet posters who have defamed and committed other tortious acts against Plaintiff.

8. Defendants Does 1 through 10 are individuals whose actual names are unknown to Plaintiff. Instead, they are known to Plaintiff only by the childish and unsophisticated --- yet often exceedingly angry --- pseudonyms they hide behind while falsely conversing in writing about Plaintiff and its agents on the Internet.

9. Plaintiff has observed Defendants and others libeling it on the Internet. Several examples of the actionable conduct of Defendants are set forth below and in the attachments to this Complaint. Plaintiff intends to obtain Defendants' identities in discovery, at which time Plaintiff, if necessary, will seek leave of the Court to amend this Complaint to identify additional Defendants and additional claims.

JURISDICTION AND VENUE

10. Pursuant to 735 ILCS 5/2-209, this Court has personal jurisdiction over Defendants because, upon information and belief, Defendants either reside in, or committed unlawful acts in, St. Clair County, Illinois.

11. Venue in this county is proper pursuant to 735 ILCS 5/2-101, because, upon information and belief, some or part of the transactions described herein occurred in this county and, upon information and belief, one or more of the Defendants reside in St. Clair County, Illinois.

POTENTIAL OTHER DEFENDANTS

12. Plaintiff may elect, after learning additional facts, to seek leave of the Court to amend this complaint to include other individuals as defendants in this action pursuant to 735 ILCS 5/2-405.

BACKGROUND

13. Prenda is a law corporation that pursues civil claims for computer-based offenses. It focuses largely on the pursuit of civil litigation against those who use computers to infringe upon others' copyrighted works for their own purposes, and who engage in contributory infringement by assisting others in infringing upon the same works. Prenda also represents clients who are victims of computer hacking.

COPYRIGHT INFRINGEMENT CASES ARISING FROM USE OF THE BITTORRENT PROTOCOL

14. The Internet has made nearly unlimited amounts of information and data readily available to anyone who wants to access it. Some of this information and data is private and available only to those who have lawful access to it. Owners attempt to protect this private content through the use of password authentication systems. Unfortunately, however, this does not ensure that content remains protected from unauthorized access. BitTorrent is a modern file sharing method ("protocol") used for distributing data via the Internet.

15. Traditional file transfer protocols involve a central server, which distributes data directly to individual users. This method is prone to collapse when large numbers of users request data from the central server, in which case the server can become overburdened and the rate of data transmission can slow considerably or cease altogether. In addition, the reliability of access to the data stored on a server is largely dependent on the server's ability to continue functioning for prolonged periods of time under high resource demands.

16. Standard P2P protocols involve a one-to-one transfer of whole files between a single uploader and single downloader. Although standard P2P protocols solve some of the issues associated with traditional file transfer protocols, these protocols still suffer from such issues as scalability. For example, when a popular file is released (e.g. an illegal copy of the

latest blockbuster movie) the initial source of the file performs a one-to-one whole file transfer to a third party, who then performs similar transfers. The one-to-one whole file transfer method can significantly delay the spread of a file across the world because the initial spread is so limited.

17. In contrast, the BitTorrent protocol is a decentralized method of distributing data. Instead of relying on a central server to distribute data directly to individual users, the BitTorrent protocol allows individual users to distribute data among themselves. Further, the BitTorrent protocol involves breaking a single large file into many small pieces, which can be transferred much more quickly than a single large file and in turn redistributed much more quickly than a single large file. Moreover, each peer can download missing pieces of the file from multiple sources—often simultaneously—which causes transfers to be fast and reliable. After downloading a piece, a peer automatically becomes a source for the piece. This distribution method contrasts sharply with a one-to-one whole file transfer method.

18. In BitTorrent vernacular, individual downloaders/distributors of a particular file are called peers. The group of peers involved in downloading/distributing a particular file is called a swarm. A server which stores a list of peers in a swarm is called a tracker. A computer program that implements the BitTorrent protocol is called a BitTorrent client. Each swarm is unique to a particular file.

19. The degree of anonymity provided by the BitTorrent protocol is extremely low. Because the protocol is based on peers connecting to one another, a peer must broadcast identifying information (i.e. an IP address) before it can receive data. Nevertheless, the actual names of peers in a swarm are unknown, as the users are allowed to download and distribute under the cover of their IP addresses.

20. The BitTorrent protocol is an extremely popular method for transferring data. The size of swarms for popular files can reach into the tens of thousands of unique peers. A swarm will commonly have peers from many, if not every, state in the United States and several countries around the world. And every peer in the swarm participates in distributing the file to dozens, hundreds, or even thousands of other peers.

21. The BitTorrent protocol is also an extremely popular method for unlawfully copying, reproducing, and distributing files in violation of the copyright laws of the United States. A broad range of copyrighted albums, audiovisual files, photographs, software, and other forms of media are available for illegal reproduction and distribution via the BitTorrent protocol.

22. Efforts at combating BitTorrent-based copyright infringement have been stymied by BitTorrent's decentralized nature. Because there are no central servers to enjoin from unlawfully distributing copyrighted content, there is no primary target on which to focus anti-piracy efforts. Indeed, the same decentralization that makes the BitTorrent protocol an extremely robust and efficient means of transferring enormous quantities of data also acts to insulate it from anti-piracy measures.

23. Plaintiff represents many clients throughout the country who have been victims of copyright infringement through the use of the BitTorrent protocol. Plaintiff has filed a large number of actions arising from copyright infringement on behalf of clients seeking monetary damages, injunctive relief and other damages arising from such wrongdoing. Because of the vast number of users who use BitTorrent protocol to infringe on a particular work, Plaintiff has represented clients in litigation against a large number of defendants whose names are unknown at the start of litigation. Plaintiff typically seeks the court presiding over the cases to allow the production of identifying information for the users, and, consistent with the strong judicial

preference for settling claims at every stage of the American judicial system, seeks to settle as many claims as it can as early as possible in litigation.

24. The identification of BitTorrent users who commit copyright infringement, and the settlement of such claims, appears to have prompted the Defendants to make false and libelous statements against Plaintiff on the Internet.

COMPUTER HACKING CASES

25. Plaintiff has also represented many clients in pursuing civil claims against those who illegally access their computer systems.

26. Hacking is the act of gaining access without legal authorization to a computer or computer system. This is normally done through the use of special computer programming software. This password cracking software repeatedly attempts to guess a password until the correct password is ascertained. The software can attempt a great number of passwords in a short period of time, sometimes even a million per second, making this type of software very efficient at obtaining a password. Individuals that utilize this type of software are called hackers. Hackers employ various other means to gain unauthorized access to data such as identifying exploitable flaws in database codes.

27. Once a password is obtained, the hacker has unauthorized access to the protected content as long as the password remains valid. Sometimes a hacker will post the hacked password on a hacked password website, making it available to the members or visitors of that website. The hacker may even charge individuals for use of the hacked password and make a profit off of the loss and harm he or she has caused to the website owner or users. There are not necessarily any limits on how often or by how many people a password can be used, so a single hacked password can potentially allow unauthorized access to significant numbers of individuals.

28. Plaintiff's efforts to identify computer hackers who illegally access and remove property and/or information from its clients' websites, and the settlement of such claims, appears to have prompted the Defendants to make false and libelous statements against Plaintiff on the Internet.

DEFENDANTS' LIBELOUS STATEMENTS

29. Plaintiff has performed a limited review of the Internet communities run and operated by the Defendants. The number of such published comments in these communities is vast. Plaintiff in this section lists several of the more egregious comments made by the Defendants.

30. Because the Defendants posted the comments referred to in this Complaint under pseudonyms, Plaintiff has no way of knowing without discovery the identity of the person who wrote and published specific comments. Furthermore, Plaintiff has no way of knowing if multiple individuals use the pseudonym to make comments; of if one writer uses multiple pseudonyms to libel Plaintiff. For those reasons, and because the pseudonyms Defendants used are uninformative, Plaintiff includes the following libelous statements that Plaintiff has observed on the Internet, along with a reference to attached screenshots of the statements, which in turn identify the pseudonym and when the comment was first put onto the Internet. (True and correct copies of the group screenshots that Plaintiff has gathered in preparing this Complaint are attached hereto at *Exhibits "A"* ("S1" references) and *Exhibit "B"* ("S2" references) and made a part hereof.)

31. Each of the statements listed below was written, and published, less than one year from the date hereof. Plaintiff lists example comments in the remainder of this section; due to

the many grammatical, spelling, logical and other errors in the comments, Plaintiff includes corrections only where they serve to explain the meaning of certain comments.

32. “[W]e all know Prenda’s colorful history and hard for a legit attorney to immediately comprehend as it is initially hard to believe...” (Ex. 1).

33. “Sorry, we are talking about Pretenda Law, this ship will sink on its own. They literally have to create there [sic] own client, computer monitoring service, and of recent steal Alan Coopers idenity to have a CEO of a offshore company. The judicial system loves this kind of stuff. I guess we just need to create a Pretenda Law care (history) package and send it to every case the file.” (Ex. 2).

34. “Would be a great idea to make a comprehensive list of all scams and BS pretenda [sic, “Prenda”] has perpetrated and make it easy accessible for Does and lawyers so they have ammuniton for these cases and can raise awareness to jurisdiction/courts/judges/attorney generals/and Doe lawyers who may be unfamiliar with prendas BS and dont have time or the means to educate themselves about the frauds.” (Ex. 2).

35. “Some ships are designed to sink... others require our assistance.” (Ex. 3).
[dietrolldie.com signature block for each and every post]

36. “This section [of a Prenda court filing] is truly a masterpiece of equine excrement, which even a failing law school student would think twice before submitting for a grade. Take a read of this section and try not to choke on what Prenda” writes. (Ex. 4).

37. Referring to Prenda Law; Troll Schulz – this isn’t easy money and your reputation (if you have one) is going to be associated with a\$\$hats and criminals.” (Ex. 5).

38. Screenshot parodying Simpsons chalkboard scene; Bart Simpson repeatedly writing “I will not file frivolous lawsuits,” captioned “Prenda Ethics Training” (Ex. 6).

39. “Would be nice though if [an attorney performing work for Plaintiff] finally grew a brain and decided to cut his losses and quit the scam and dis-associate himself from Prenda. I am looking forward to the end of the month with news of victory for Abrahams.” (Ex. 7).

40. “Prenda was so stupid that they then filed a single-Doe case against Abrahams even with the registration problem. Due to the history of shameless fraud in this case, I’m hoping Yuen makes them pay for this one. They didn’t have quite the registration problems with Wong v. HDP, so I believe there is more opportunity to turn the screws and maybe even go for sanctions, damages or class action with this one. I can envision a class-action suit with all defendants from HDP v. Does 1-118 as a class, since they were all victims of extortion attempts based on Prenda’s fraudulent claims that the work was registered.” (Ex. 8).

41. “Prenda then doesn’t have to prove that the John Doe or Mr. Hatfield infringed. It then becomes Mr. Hatfield’s responsibility to do this and seek legal action against John Doe to make him pay his portion of the fine. Pretty slick idea isn’t it – In a slimy bottom feeding lawyer way. Note: not all lawyers are like this, but if the shoe fits...” (Ex. 9).

42. “Funny how Prenda will not actually name its investigators and the company they employ. Well I will – Company: 6881 Forensics LLC. Investigator (term very loosely applied): Peter Hansmeier. This is nothing more than a Prenda cover for the Steele/Hansmeier operations that stinks of questionable personnel, untested “forensic” software, non-certified forensic/Investigative personnel, unethical behavior, and an incestuous relationships of all parties involved. “ (Ex. 10).

43. “Just more FUD from the great minds at Prenda. Keep it up boys, just more evidence to support the abuse of process and harassment claims.” (Ex. 11).

44. “Wow.. This is exactly the same message I got today. I knew it was a robo call by the cheap ass voice. I guess these crooks have too much on their plate.” (Ex. 12).

45. “Not that Prenda really cares about possible defendant guilt or innocence. They only want to generate settlements and the possibility of innocent parties only messes up their business model. In their eyes, all the defendants are guilty.” (Ex. 13).

46. Prenda’s “repulsive business model started the same way in the Federal system and now because of our actions, is moving on to new uncharted ground. I’m sure some of our friendly lawyers will enlighten us on the veiled “30 day” reference. That or the affected Does will find us via Google and the fun begins. You claims of great success in the courts is the usual Troll bravado. Yawn..... We understand we will not be successful all the time, but we are one hell of a thorn in your side. The thorn will fester and your operations will suffer for it.” (Ex. 14).

47. “It stills seems like [attorneys performing work for Prenda] and Prenda are saying “we promise to be trustworthy even though we have a long record of not being trustworthy”. Why not treat wolves to free bottles of steak sauce to discourage their attacks?” (Ex. 15).

48. “Well I got to give it to the sneaky minds at Prenda Law.” (Ex. 16).

49. Prenda’s litigation “is a blatant abuse of the rule 45 (we’ll hear about this particular sleaziness soon).” (Ex. 17).

50. “[L]et’s be clear about what Prenda was doing. They publicly accused Abrahams of being a criminal, while pressuring him to pay them to stop publicly accusing him of being a criminal. This is the definition of blackmail ...” (Ex. 18).

51. “Prenda employs a brain-damaged attorney. Sooner or later John will have to pimp his blonde to cover his a\$\$!” (Ex. 19).

52. “Yet one more reason why these efforts at extortion will never see the inside of a courtroom.” (Ex. 20).

53. “Media Copyright Group, 6881 Forensics, etc.; this is the basis for what gets Prenda and the other Trolls their subpoenas granted. Destroy this and their operation takes a dive. Don’t lose faith and keep telling the Trolls to bring it on. They don’t want a full-out trial, only your money.” (Ex. 21).

54. “Prenda also apparently has decided to pack up and move the scam to the California Eastern District” (Ex. 22).

55. “Dan Booth and Jason Sweet are currently involved in multiple battles with Prenda’s local goon and swindler Daniel Ruggiero.” (Ex. 23).

56. “It is hardly a surprise to those who follow Prenda and other trolls: cockroaches tend to explore cracks in the floor (in this case, in the floor of the US judicial system).” (Ex. 24).

57. “Many local counsels deceived by Prenda turned out to be ethical attorneys (George Banas, Jonathan Torres, Matthew Wasinger, Trina Morrison...) and would not even think about associating their names with Prenda scumbags if they knew how much their cores are rotten. Seeing that, I would not rush and blame an underemployed attorney: I hope he will smell the stink of decay that the criminal organization Prenda exudes and will resign from this case — the sooner the better. (Ex. 25).

58. “It was obvious that a rash of CFAA cases filed in state courts by Prenda con artists — Guava v. Skylar Case (Cook county, IL), Guava v. Spencer Merkel (Hennepin county, MN), and Arte de Oaxaca v. Stacey Mullen (Cook county, IL) — were sham lawsuits that employed the same scheme.” (Ex. 26).

59. “Prenda’s fraudulent activity continues unabated: new harassing calls, ransom letters etc.” (Ex. 27).

60. Recently I heard too many reports that Steele Hansmeier / Prenda Law / Anti-Piracy Law Group has intensified its harassing calls. And the crook on the other end of the phone line is no one else but previously “retired” (or rather fired — after he foolishly disobeyed his master’s order to move to Las Vegas) Mark Lutz. These calls are beyond fraud.” (Ex. 27).

61. “I assume they’re calling everyone in their shakedown database and trying to get cash before they kill Prenda, leave the country, or go to jail..not sure which one will come first.” (Ex. 28).

62. “While “Prenda” was a rather neutral term (please don’t start the “Pretenda” joke), ironically the criminal enterprise has managed to embed the deceit as a modus operandi in its very name: one simply cannot be anti- its own turf. It’s like if a plumber would declare that he is anti-sewage. Or a lion would declare that he is anti-meat.” (Ex. 29).

63. “We all know how Prenda crooks have been doing a hard work of depriving people a say in the court, the very people they rape” (Ex. 30).

64. “Is Prenda calling it quits or cooking a new fraud?” (Ex. 31).

65. “I cannot read crooked minds, and undeniably, we don’t have enough information to speculate about both why all these sudden dismissals are taking place, and why the most suspicious “plaintiffs” were spared at this time. I hope that Prenda’s impudent fraudulent activities have finally caught attention of law enforcement, and the crooks are on the run.” (Ex. 32).

66. “Does ‘under penalty of perjury’ mean anything? Apparently not for Prenda and one of its plaintiffs.” (Ex. 33).

67. [W]e consider your clients [i.e., Prenda] the worst representatives of our society and do everything in our ability to accelerate their downfall, this case will continue to gain publicity. I expect bigger media outlets (TechDirt, ArsTechnica, Wired) to spread the news pretty soon.” (Ex. 34).

68. (Fight Copyright Trolls email to Prenda’s Florida attorneys for the sanction hearing attempting to threaten them to get off of the case) “His masters [i.e., Florida attorneys working on behalf of Prenda], criminal masterminds from now being abandoned ship Prenda, are not in much better situation.” (Ex. 35).

69. “[C]rooked bosses [i.e., Prenda] are in the process of pulling a machination — abandoning the old corporation (most likely, to avoid writing the annual report and to get rid of bad publicity) and creating another one — with the same people, same mailing address, same website and same goal — mass extortion.” (Ex. 36).

70. “SJD, since you have a habit of sending welcome letters to new local counsels, you must have many of them in your address book already. How about sending Prenda’s a helpful note regarding their employer’s current lack of good standing? Some of these guys may be naive, they may be stupid, a few may even be genuinely evil, but I’ll be all of them are lawyer enough and have a strong enough sense of self-preservation to find the idea of “Personal Liability” utterly terrifying. You may have the means to trigger a collecting pants-soiling and send the rats over the sides of this sinking ship.” (Ex. 37).

71. “Why anyone wants to abandon the company that is not bankrupt, that has a nice positive settlement cash flow, not being sued etc.? Only crooks need machinations like this to operate.” (Ex. 38).

72. “Too many of the marks were Googling “Prenda” and discovering what assclowns they are. Not good for business. Am I the only one wondering if they plan to keep on changing their skin every year, just as the annual report comes due?” (Ex. 39).

73. It took only a year before the majority of judges in the country started recognizing the name “Prenda,” frowning every time they hear it. What our fraudsters are supposed to do? Maybe simply changing the name will help?” (Ex. 40).

74. “I bet you know an amateurish-looking portal Wefightpiracy.com whose few goals are simpler than its design: to spread FUD, to justify criminal activity with the help of poorly-articulated ideas lifted from multiple copyright maximalists, and to facilitate defamation.” (Ex. 40).

75. “[O]ur bandits are now called “Anti-Piracy Law Group” in an attempt to squeeze a couple of more dimes from the judicial system bastardized by them.” (Ex. 40).

76. “I say we all chip in and order one of those “How to Survive in Prison” books for each Prenda attorney and have like a dozen sent to Duffy’s office in Chicago because guaranteed all of those clowns in the office know about it too. Maybe order Duffy’s wife a book about how to deal with her husband being in prison... “You and your spouse are now separated by plexiglass” hahaha.” (Ex. 41).

77. These [i.e.,Prenda attorneys] are the kind of people who would rob their families blind if it suited their ambitions. A few decades ago, Psychologist would be diagnosing these clowns as Criminal Psychopaths (now it’s called Antisocial because the public had hurt feelers) ... [T]his is the same psychosis that drives (drove) people like Bundy and Dahmer ... These men have ... the mentality of Ted Bundy...” (Ex. 41).

78. “[W]e’ve destroyed the reputation of every single Prenda associated troll who stuck it out ... For example, Google “Paul Lesko” and the second result that I get is a link to a story about Lesko and “Teen Anal Sluts” hahahaha.” (Ex. 42).

79. “And this is where blogs like this come in. When a law partner google a prospective new hire’s name, and the first hit is an expose of that person on fightcopyrighttrolls.com describing how they shook down a poor, defenseless grandma for a few thousand dollars over an illegal download of “stop daddy, my ass is on fire” ... that may raise a few eyebrows ..., lawyers will soon loathe to be associated with Prenda, ... Let’s share a toast to seeing America’s bigger n better version blow up even more dramatically, eh?” (Ex. 42).

80. Prenda has a “history of fraud...” ” (Ex. 43).

81. “The thing to keep in mind is that no matter how vicious they get, they still have no teeth...When things get real, they’re just a bunch of bumbling idiots playing a massive game of “Who’s on first?”.” (Ex. 44).

82. “We won’t hear about it until they make arrests but I’m pretty sure Prenda has been on the FBI’s radar for quite some time.” (Ex. 45).

83. “Every time a new guy understood that the newly acquired stink he couldn’t get rid of is exuded by Prenda Law, he ran away as quickly as possible. Even 75% contingency fee cannot persuade local lawyers to stain their future careers by associating themselves with a lawfirm that is actively investigated by the Florida Bar Association, and is expected to be investigated criminally in the nearest future.” (Ex. 46).

84. “Prenda engages in fraud upon the public and the judicial system, [and][a careful reading of this transcript will put those doubts to rest. Prenda’s past and current employees ... all misrepresent their capacity and involvement in this circus...” (Ex. 47).

85. A “cast of idiots ... run[s] Prenda Law.” (Ex. 48).

86. “I encourage you to read the comments to understand the unprecedented extent of Prenda’s arrogance and bad faith.”(Ex. 49). “Since I used words farce, fraud, frivolous describing much less brazen abuses of the court system by copyright trolls, I ran out of epithets. I cannot find proper words that describe this garbage. And it will get even worse: we will for sure witness more fraud if Prenda criminals are not deterred ASAP.” (Ex. 50).

87. “The reason ... Prenda “gang” ... have their law licenses is because the IARDC works at an INCREDIBLY SLOW pace.” (Ex. 51).

88. “Prenda’s clowns are incompetent enough when calm and sober.” (Ex. 52).

89. Below is Raul’s translation from Pinocchiolean: Full-Time Apprentice Copyright Troll (mill valley) Mill Valley Of Counsel to Copyright Troll Firm, Prenda Law, seeking full-time apprentice troll to help maintain the caseload provided by a nationally disdained Chicago-based copyright troll firm specializing in a barely legal extortion racket. Currently, this is a one-person scumbag operation, and will be looking for someone to work with that one person directly to accomplish the tasks presented. Very sleazy environment in the office but we keep lots of beer on hand to please our leader, Master Troll John Steele, in case he visits us from sunny Florida. A lot of opportunities to appear in State and Federal courts to receive lashing by judges, potential sanctions, and unanimous contempt by others in the legal profession. Necessary Qualifications: - No clear moral compass; - Ability to work independently on certain projects like harassing grandmothers, the blind, and the innocent; - Love of money above all else; - Good at not being good but being a little evil; - Must be proficient in Douchebaggery; - Creative in lying to others.” (Ex. 53, 54).

90. “Being affiliated with Prenda will and likely is toxic to any attorney’s reputation and, as in any profession, reputation is everything ... Put “Prenda Law, LLC” on your resume and guaranteed, no one will hire you so the lawyers there better make as much as they can, as fast as they can because no semi-reputable law firm or even hick county public defender’s office will wanna go near them afterward. Their reputation, tainted. Freshly-minted JDs associated with Prenda, wow, they’re boned.” (Ex. 55).

91. “[I]f at this moment any of Prenda’s criminals ... were nearby, I honestly don’t know if I would be able to restrain myself ..”. “The crooks must be stopped unless it is too late ... Please don’t be passive.” (Ex. 56).

92. Prenda is “about 1 step up from the people who send emails looking for help to move millions of dollars from other countries and just need your bank details or you to send some fee money to make it happen. They prey on people and are parasites, and we try to give people the best possible defense... information. If you know it is a scam, and they will say anything to make a buck their words are much less scary.” (Ex. 57).

93. “[A]t least few uneducated Does would contact Prenda for clarifications, and be conned as a result. As I repeatedly state, talking to a troll is a big no-no: you cannot outfox seasoned fraudsters.” (Ex. 58).

94. “Prenda’s continuous disregard of ethics leads to a motion for sanctions.” (Ex. 59).

95. “Prenda utilizes the entire database of addresses they were able to loot using unsuspecting courts as burglary tools ... this is a deliberate fraud on the federal court.” (Ex. 60).

96. Reading this “journalism,” you might mistake corrupt, state judge LeChien — who issues subpoenas for alleged crimes he cannot try — for Justice Brandeis.” (Ex. 61).

97. “Prenda Law is an infamous clique of lawyers who file hundreds of mass extortion-like lawsuits against peer-to-peer users who allegedly share copyrighted pornography movies. This outfit has no desire to progress their cases to the actual litigation ...Prenda Law comprises some creative con artists and managed to deceive judges around the country for more than a year.” (Ex. 62).

98. “Shame on Judge LeChien for allowing this to happen and shame on Prenda for engaging in Grisham (the antagonists) like behavior ... “His Honor” may face some awkward questions sooner rather than later..” (Ex. 63).

COUNT I – LIBEL PER SE
(False Allegations of Criminal Offenses)

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

100. Defendants made the statements set forth in Paragraphs 29 through 98, as well as a vast number of similar statements, posted to the same and similar Internet sites. Those statements remained on those sites until at least shortly before the filing of this Complaint, and thus are still, as of the date hereof, being published without restriction to any person in the world with an Internet connection who visits those unrestricted sites.

101. The statements set forth in Paragraphs 29 through 98 falsely allege that Prenda, and its agents, have committed criminal offenses. Among other things, and as set forth therein, one or more Defendant wrote, and published to third parties, statements that Prenda, and/or attorneys working for or on its behalf, were engaged in a “scam” and “criminality;” being “crooks;” engaging in “blackmail” and an “extortion scheme;” being “crooked;” engaging in “criminal acts;” and being “seasoned fraudsters.” One such Defendant declared that Prenda’s attorneys were “like Dahmer and Bundy,” two mass murders.

102. Defendants' false statements accusing Plaintiff of criminal offenses generally, and specific criminal offenses such as extortion, blackmail and fraud, are libelous *per se*.

103. Defendants made those statements with either knowledge of their falsity, or in reckless disregard of the truth. Neither Plaintiff, nor any individual performing work for it, is a public figure. In many of those statements, however, Defendants admit that they were making false statements with actual malice, for the express purpose of damaging the business reputation of Prenda, its clients and attorneys performing work on its behalf. Among other things, one or more Defendant stated that his purpose in making defamatory statements was to assure that being associated with Prenda was toxic to any attorney's reputation.

104. Defendants' false and defamatory statements that Plaintiff has committed criminal offenses has caused Plaintiff significant actual damages including, but not limited to, damaged reputation, loss of revenue, loss of prospective clients and other damages.

COUNT II – LIBEL *PER SE*
(False Allegations of Want of Integrity in Employment)

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

106. Defendants made the statements set forth in Paragraphs 29 through 98, as well as a vast number of similar statements, posted to the same and similar Internet sites. Those statements remained on those sites until at least shortly before the filing of this Complaint, and thus are still, as of the date hereof, being published without restriction to any person in the world with an Internet connection who visits those unrestricted sites.

107. The statements set forth in Paragraphs 29 through 98 falsely allege that Prenda, and its agents, want of integrity in employment. Among other things, and as set forth therein, one or more Defendant wrote, and published to third parties, statements that Prenda, and/or

attorneys working for or on its behalf, were engaged in a “scam” and “criminality;” “evil;” that they are not “legitimate” attorneys; they are “crooked;” “incompetent;” that they “facilitate defamation;” are “goons” who are participating in “fraud on the court[s];” are “bottom feeding;” “crooks;” and that they “shook down a poor, defenseless grandma for a few thousand dollars over an illegal download of ‘stop daddy, my ass is on fire’”

108. Defendants’ false statements accusing Plaintiff of want of integrity in employment as attorneys are libelous *per se*.

109. Defendants made those statements with either knowledge of their falsity, or in reckless disregard of the truth. Neither Plaintiff, nor any individual performing work for it, is a public figure. In many of those statements, however, Defendants admit that they were making false statements with actual malice, for the express purpose of damaging the business reputation of Prenda, its clients and attorneys performing work on its behalf. Among other things, one or more Defendant stated that his purpose in making defamatory statements was to assure that being associated with Prenda was toxic to any attorney’s reputation.

110. Defendants’ false and defamatory statements that Plaintiff has committed criminal offenses has caused Plaintiff significant actual damages including, but not limited to, damaged reputation, loss of revenue, loss of prospective clients and other damages.

COUNT III – LIBEL PER SE
(False Allegations Imputing Lack of Ability in Plaintiff’s Profession)

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

112. Defendants made the statements set forth in Paragraphs 29 through 98, as well as a vast number of similar statements, posted to the same and similar Internet sites. Those statements remained on those sites until at least shortly before the filing of this Complaint, and

thus are still, as of the date hereof, being published without restriction to any person in the world with an Internet connection who visits those unrestricted sites.

113. Many of the statements set forth in Paragraphs 29 through 98 falsely allege that Prenda, and its agents, lack professional ability. Among other things, and as set forth therein, one or more Defendant wrote, and published to third parties, statements that Prenda, and/or attorneys working for or on its behalf, are “incompetent;” “naïve;” “stupid;” “evil;” “criminals” “crooks” and “seasoned fraudsters.”

114. Defendants’ false statements that Plaintiff and its agents lack ability as attorneys, their profession, are libelous *per se*.

115. Defendants made those statements with either knowledge of their falsity, or in reckless disregard of the truth. Neither Plaintiff, nor any individual performing work for it, is a public figure. In many of those statements, however, Defendants admit that they were making false statements with actual malice, for the express purpose of damaging the business reputation of Prenda, its clients and attorneys performing work on its behalf. Among other things, one or more Defendant stated that his purpose in making defamatory statements was to assure that being associated with Prenda was toxic to any attorney’s reputation.

116. Defendants’ false and defamatory statements that Plaintiff wants of ability in its profession has caused Plaintiff significant actual damages including, but not limited to, damaged reputation, loss of revenue, loss of prospective clients and other damages.

COUNT IV – LIBEL PER SE
(False Allegations of Plaintiff’s Agents of Fornication and Adultery)

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

118. Defendants made the statements set forth in Paragraphs 29 through 98, as well as a vast number of similar statements, posted to the same and similar Internet sites. Those statements remained on those sites until at least shortly before the filing of this Complaint, and thus are still, as of the date hereof, being published without restriction to any person in the world with an Internet connection who visits those unrestricted sites.

119. Certain statements set forth in Paragraphs 29 through 98 falsely allege that Prenda's agents committed fornication and adultery. Among other things, Defendants have accused Plaintiff's agents of "incest," being "cornholers" and promoting prostitution

120. Defendants' false statements as to fornication and adultery are libelous *per se*.

121. Defendants made those statements with either knowledge of their falsity, or in reckless disregard of the truth. Neither Plaintiff, nor any individual performing work for it, is a public figure. In many of those statements, however, Defendants admit that they were making false statements with actual malice, for the express purpose of damaging the business reputation of Prenda, its clients and attorneys performing work on its behalf. Among other things, one or more Defendant stated that his purpose in making defamatory statements was to assure that being associated with Prenda was toxic to any attorney's reputation.

122. Defendants' false and defamatory statements that Plaintiff wants of ability in its profession has caused Plaintiff significant actual damages including, but not limited to, damaged reputation, loss of revenue, loss of prospective clients and other damages.

COUNT V – FALSE LIGHTS

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

124. Each of the Defendant's statements has placed Plaintiff in a false lights before the public. In addition to those set forth in the preceding Counts of this Complaint, Defendants have published statements that Prenda's agents have "psychosis like Dahmer and Bundy," two convicted mass murderers; engage in "mass extortion;" and will soon be jailed. One Defendant bragged that, due to his efforts, a google search of an attorney formerly associated with Prenda would produce, as the second result, the attorney's name with "a link to a story about [the attorney] and 'Teen Anal Sluts' hahahaha."

125. The false lights, as alleged above, were of such a nature as to be highly offensive to a reasonable person.

126. Defendants' false and defamatory statements have caused Plaintiff significant actual damages including, but not limited to, damaged reputation, loss of revenue, loss of prospective clients and other damages.

COUNT VI – TORTIOUS INTERFERENCE WITH CONTRACTUAL RELATIONSHIPS

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

128. At all times relevant hereto, Plaintiff was a party to valid and enforceable contracts with third parties. Those third parties included clients that retained Plaintiff to represent them in court, and attorneys who performed work as agent or of counsel to Plaintiff.

129. Some or all Defendants admitted, in published statements referenced above and in other statements, that they were aware that Plaintiff had such business relationships with its clients and attorneys performing work on its behalf.

130. Defendants intentionally engaged in the unjustified inducement of a breach, by making false and defamatory statements about Plaintiff. Several Defendants expressly admitted that they published such statements to alienate Plaintiff from its clients and attorneys.

131. Defendants' wrongful conduct caused subsequent breaches of parties to which Plaintiff was a party by third parties. Among other things, Prenda lost both clients and attorneys as a consequence of certain defamatory statements that Defendants published, and by other conduct by Defendants.

132. Defendants' false accusations has caused Plaintiff significant actual damages including, but not limited to, damaged reputation, loss of revenue, loss of prospective clients and other damages.

**COUNT VII – TORTIOUS INTERFERENCE WITH
A PROSPECTIVE BUSINESS RELATIONSHIP**

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

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

135. At all times relevant hereto, Plaintiff had a reasonable expectation of entering into valid business relationships with third parties, including prospective clients and attorneys whom Plaintiff may have retained or contracted with to representation of its clients.

136. Some or all Defendants admitted, in published statements referenced above and in other statements, that they were aware that Plaintiff had a reasonable expectation of entering into valid business relationships with prospective clients and attorneys who may work on its behalf.

137. Plaintiff was a party to valid and enforceable contracts with third parties. Those third parties included clients that retained Plaintiff to represent them in court, and attorneys who performed work as agent or of counsel to Plaintiff.

138. Some or all Defendants admitted, in published statements referenced above and in other statements, that they were aware that Plaintiff had such business relationships with its clients and attorneys performing work on its behalf.

139. Defendants intentionally engaged in the unjustified interference that prevented Plaintiff's legitimate expectancy from ripening into valid business relationships.

140. Defendants' false and defamatory statements have caused Plaintiff significant actual damages including, but not limited to, damaged reputation, loss of revenue, loss of prospective clients and other damages.

COUNT VIII – CIVIL CONSPIRACY

141. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

142. The Defendants collaborated with one another by planning, coordinating and assisting one another in preparing the defamatory statements that were disseminated to third-parties via the Internet "communities" referenced above. Each Defendant engaged in a concerted action with other Defendants and yet unnamed individuals to defame and commit other tortious conduct against Plaintiff.

143. Each Defendant who posted false and defamatory comments in connection with this "community" thus conspired with other Defendants to commit defamation and other tortious actions against Plaintiff.

144. In furtherance of this civil conspiracy, Defendants and others committed overt tortious and unlawful acts by making and publishing to third parties false and defamatory statements about Plaintiff, and each was a willful participant in this joint activity.

145. As a proximate result of this conspiracy, Plaintiff has been damaged, as is more fully alleged above.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests Judgment and relief as follows:

- 1) Judgment against Defendant that they have committed the torts set forth in each of Count I through Count VIII hereof;
- 2) Judgment in favor of the Plaintiff and against the Defendants for damages in excess of \$100,000 against each Defendant to be ascertained at trial;
- 3) Judgment in favor of Plaintiff against the Defendants awarding the Plaintiff attorneys' fees, litigation expenses (including fees and costs of expert witnesses), and other costs of this action; and
- 4) Judgment in favor of the Plaintiff against the Defendants, awarding Plaintiff declaratory and injunctive or other equitable relief as may be just and warranted under the circumstances.

Respectfully submitted,

PRENDA LAW, INC.

DATED: February 11, 2013

By: _____



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Exhibits 1- 63

Ex. 3

John Doe through an IP address without obtaining ISP subscriber information; as such, Plaintiff now dismisses this action without prejudice in order to avoid the futility of attempting to litigate these cases under such circumstances.






Make sure you also look at the [fightcopyrighttrolls.update](#) concerning this development and a little gem from Judge Wright following the dismissal by Troll Gibbs, [Doe13_Order_08333\(CA\)](#) **This order (issued on 28 Jan 13) instructs both sides that Plaintiff/Prenda is still required to answer the Discovery questions concerning Alan Cooper by 12 Feb 13. The judge also stated a case status report in due to be filed no later than 19 Feb 13, with a mandatory case status conference to be held in the court on 4 Mar 13, at 1:30PM. The purpose of the conference is "to discuss the status of this early discovery."**

This going to be fun to watch, as the court made it clear that failure to abide by these orders will result in sanctions.

DTD ☺ *"Some ships are designed to sink... others require our assistance."*

Life sometimes gets so busy that you have to put certain tasks on hold while you "put out the fires" that come with everyone's life. I was planning to write a declaration for this case after reading the mindless ramble Prenda Troll Brett Gibbs made regarding <http://www.fightcopyrighttrolls.com> and myself while seeking sanctions against Doe Defender Morgan Pietz. [Mot_Sanc_08333\(CA\)](#)

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Ex. 4






On 14 Nov 12, Troll Gibbs submitted the proposed amended SAC. [ProSAC_Cover_02049\(CA\)](#) [Pro_SAC_02049\(CA\)](#) [Pro_SAC_Ext_02049\(CA\)](#) [Pro_SAC_Ext_02049\(CA\)](#) The court noted this proposed SAC was identical to the first one except for the new section of "Plaintiff's Further Investigation of Defendant."



This section is truly a masterpiece of equine excrement, which even a failing law school student would think twice before submitting for a grade. Take a read of this section and try not to choke on what Prenda tries to put forward as evidence to show that they now believe Mr. Hatfield is the actual infringer of Plaintiff's movie. Be careful ladies and gentlemen. If you have any of these indicators, you could be named as a "Copyright infringer."

- Hatfield had "a large Internet presence" and "that presence demonstrated defendant's knowledge of computers and the Internet"

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Posts - Fightcopyrighttrolls.com

- [LiveWire Holdings: Evolution of Prenda's Fraud, Part II](#)
- [LiveWire Holdings: Evolution of Prenda's Fraud, Part I](#)
- [Brett Gibbs runs from justice like a petty thief caught lifting a loaf of bread](#)
- [Connecticut defendant strikes back at AF Holdings with articulate counterclaims](#)

Ex. 5

TX Forum Shopping Case

dieTroldie.com 2012/12/20/tx-forum-shopping-case-411-cv-04501-dismissed-by-prenda-law-nc case 411-cv-04501

50,46,192,24) in this action. We filed Motions for Protective Orders on behalf of both Non Party Does which were granted (Rec. Docs. 98 and 113). Mr. Schultz indicated to me that he plans to proceed individually against my client using the personal information he obtained during the course of this action. That information is covered under the Protective Order and we believe any use of that information violates your Order.

Most likely they will not, but you never know what foolish behavior Prenda Law may exhibit. I hope the judge does something, but to be honest, I have little faith. I bet Troil Schultz doesn't have clue about this case in particular, or copyright infringement in general.

Troil Schultz - this isn't easy money and your reputation (if you have one) is going to be associated with asshats and criminals.

DTD

*** Thank you Doe for posting this information. *** On 14 Dec 12, Local Prenda Law Inc., Copyright Troil ~~Doeg~~ ~~Clamons~~ mentioned the Texas court to dismiss the case without prejudice - 4:11-cv-04501, Millennium TGA, Inc. v. John Doe, et al (999 Does). The judge agreed and signed the dismissal order. Court dismisses 41501TX John Doe, 04501TX Note: Clamons took over when Doug McIntyre "punched out" - Robert Cashman Article

This case first started off as a DC case (filed 7 Dec 11) in which Prenda Law Inc., closed it only nine days after it was assigned to an unfriendly judge - Fightcopyrightrtrolls Article. I wrote about the case when Prenda Law Inc., repackaged it into a new case in Texas, four days after the DC closure. DTD Article. The TX case stayed open for approximately one year and NOBODY was EVER named or served with a summons/complaint or even a

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- Back on Judge Steps Release of Subscri...
- Back on What Is Your Story?

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Ex. 6

Judge Cites Apparent 'Bad Faith'

dieTroldie.com 2012/11/13/judge-cites-apparent-bad-faith-in-prenda-law-nc case 517-cv-03048Botson

Furthermore, the court is concerned that the proposed amendments are sought in bad faith. The timing of this request - after Botson has been dismissed as a defendant and immediately prior to the final deadline for service - as well as the generality of the motion and SAC are suggestive of an attempt to simply keep the only identified defendant "on the hook."

So on 6 Nov 12, Judge Edward Davila, ordered the case to be closed. Prenda couldn't find their Phantom Doe - no surprise.



Well Botson was already free and clear of any claims of copyright infringement for this allegation - judged on its merits. This dismissal of the Phantom Doe and denial to amend the complaint just puts the final nail in the coffin. It also means that Mr. Ranallo will likely file a motion for Plaintiff to pay costs and reasonable attorneys fees. Having this dismissal order showing apparent 'Bad Faith' from Plaintiff Prenda as an attachment to the motion is going to be sweet. I would also guess that Ranallo (and other attorneys) will use the Prenda Web site as proof their clients were being ~~delanded~~ even after cases have been dismissed two times (adjudicated on the merits). Here are some recent screen shots showing Botson (along with Hatfield & Tinsy) on the Prenda Web site - which calls these individuals 'intingershackers.' Way to go Duffy!

back at AF Holdings with articulate counterclaims

Comments - Fightcopyrightrtrolls.com

- Comment on LiveWire Holdings: Evolution of Prenda's Fraud, Part II by JT Martin
- Comment on LiveWire Holdings: Evolution of Prenda's Fraud, Part II by Anonymous
- Comment on LiveWire Holdings: Evolution of Prenda's Fraud, Part II by Anonymous
- Comment on LiveWire Holdings: Evolution of Prenda's Fraud, Part II by Anonymous

dieTroldie

Ex. 7

Prenda Law Inc. | Dietroidie.com

Troll Gibbs Feels The 'Doe' x

dietroidie.com/2012/09/13/troll-gibbs-feels-the-doe-see-abrahams-responds-to-hard-drive-production-312-cv-01000-cc/

Maybe we will get a checkmate this time instead of a draw.

Read

Irritated Troll Hater says:
September 13, 2012 at 10:45 am

YUEN SMASH GIBBS!!!!!! (Hulk voice)

Steven Yuen seems to be Prenda's kryptonite. I have a feeling that not only will the eventual loss not phase Gibbs, but he will have another encounter with Yuen. Would be nice though if Gibbs finally grew a brain and decided to cut his losses and quit the scam and dis-associate himself from Prenda. I am looking forward to the end of the month with news of victory for Abrahams.

Down with all Trolls

Read

Guest says:
September 14, 2012 at 4:54 am

Wasn't it some time ago that Steele was here, bragging about how he believed Yuen was losing? Steele has so much egg on his face, you could fry an omelette.

Read

that anonymous coward says:
September 14, 2012 at 9:57 am

Ex. 8

Prenda Law Inc. | Dietroidie.com

31 Jul 12 Update - 5th pt. x

dietroidie.com/2012/07/31/jul-12-update-5th-pt-abrahams-v-hard-drive-productions-case-312-cv-01000/

Anonymous says:
July 31, 2012 at 9:51 am

DTD alludes to it in his comment about how Prenda can only hope for actual damages, but for those coming late to the party it is always worth repeating that the case that provoked this, Hard Drive Productions, Inc. v. Does 1-118, was for a work that was not registered with the Copyright Office at the time the alleged infringements occurred. Infringement dates were in March 2011, the work was not registered until November 2011, so Prenda's statement in the original complaint that a registration was pending was a lie and their request for statutory damages was based on this fraud.

Prenda was so stupid that they then filed a single-Doe case against Abrahams even with the registration problem. Due to the history of shameless fraud in this case, I'm hoping Yuen makes them pay for this one. They didn't have quite the registration problems with Wong v. HDP, so I believe there is more opportunity to turn the screws and maybe even go for sanctions, damages or class action with this one. I can envision a class-action suit with all defendants from HDP v. Does 1-118 as a class, since they were all victims of extortion attempts based on Prenda's fraudulent claims that the work was registered.

Read

John Whitaker says:
July 31, 2012 at 9:02 pm

This is very interesting. It looks like Prenda Law is trying to make an example out

Ex. 9

around the difficult issue of proving copyright infringement by the ISP subscriber. Prenda knows a good percentage of the ISP subscribers they target are not the actual infringers. It could be another member of the residence, neighbor, guest, or an unauthorized user of the Internet connection. They do not know and really don't want to spend the time and money to try to find out. Remember this is a business model – making money is the goal. Doing an investigation is costly and eats away at the profits. The way they do this is by claiming that an "Unknown" person (John Doe) was the actual infringer and that the named person (Defendant Hatfield here) was negligent in allowing John Doe to use his Internet connection. By combining these two under the "Joint and Severally" liable claim, they can go after Mr. Hatfield for negligence; if successful, he will get stuck with the copyright infringement portion. Prenda then doesn't have to prove that the John Doe or Mr. Hatfield infringed. It then becomes Mr. Hatfield's responsibility to do this and seek legal action against John Doe to make him pay his portion of the fine. *Pretty slick idea isn't it – In a slimy bottom feeding lawyer way. Note: not all lawyers are like this, but if the shoe fits...*

Analysis

Prenda addresses the topics of *Preemption*, *Statutory Immunity*, and *Duty* regarding the

Michigan 300 – AF Holding v. Matthew Croona, 4:12-cv-14442 (MD)
Night Of The Living Prenda (Phantom Doe = B), AF Hol L.L.C. v. John Doe (Josh Ha 4:12-cv-02049 (CA)

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- New Troll Victim on Lipscomb Fishing C...
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- Rant on Prenda Cornholers Motion D...
- Dan on What is Your Story?
- Rant on Judge Stop Re

Ex. 10

... simply snapshot observations of when the IP address was observed in the BitTorrent swarm; the conduct took itself place before and after these dates and times. {Section 27.}

Funny how Prenda will not actually name its investigators and the company they employ. Well I will – Company: 6881 Forensics LLC. Investigator (term very loosely applied): Peter Hansmeier. This is nothing more than a Prenda cover for the Steele/Hansmeier operations that stinks of questionable personnel, untested "forensic" software, non-certified forensic/Investigative personnel, unethical behavior, and an incestuous relationships of all parties involved.

As I previous stated, Prenda is trying this negligence move to avoid having to show the court the details of their operation and actually prove that Mr. Hatfield was the infringer. You will hear this time and again: The public IP address they collect is piss-poor evidence by itself. If they can get the negligence claim to stand, Mr. Hatfield would become jointly and severally liable for the entire judgment. This means if the court makes a judgment for the Plaintiff for \$30K (statutory damages, legal fees, experts, etc.), all the parties (Phantom Doe and Mr. Hatfield) are liable to pay it. As no one knows who this Phantom

Ex. 11

Copyright Trolls (Comcasters) Roll Into Indiana -- CP 5 Jul 12 Update -- Lipstick On A Pig -- AF Holdings, LLC, v. Productions Inc., v. John Doe, 1:12-cv-00806 Joshua Hatfield, 4:12-cv-02049 (CA) --

Prenda Robo-Calls = Stupidity Gone Automatic

Posted on June 16, 2012

Many Does have been reporting that the normal Prenda-Lutz harassment telephone calls have been replaced with an automatic call-messaging system.

One Doe was kind enough to provide a transcript of the stupidity. I assume they probably have a few different versions of messages to be applied to different groups of Does. This message was for a Doe that refused to settle and gave Prenda the Richard Pryor Response. *Tell me Prenda, how many people have been giving you the RPR lately?* The case this Doe is under was initially filed in July 2011, and was voluntarily dismissed in 2012. So it looks like Prenda is going after Does when there is no active case against them. Just more FUD from the great minds at Prenda. *Keep it up boys, just more evidence to support the abuse of process and harassment claims.*

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Ex. 12

When scary letters fail to do the trick, have our robotic voice put the fear of you into them...

Maybe they should have spent the extra \$5 and gotten a better voice.

Of course calling people from cases dismissed with prejudice might be a stupid thing to do, but I expect no less from our friends at Pretenda Law....

Reply



F U PRENDA says:

June 17, 2012 at 6:37 am

Wow.. This is exactly the same message I got today. I knew it was a robo call by the cheap ass voice. I guess these crooks have too much on their plate.

Reply



sophisticatedjanedoe says:

June 17, 2012 at 6:45 am

Follow

Ex. 13

Prenda Law Inc. | DieTroll | Who n Afraid of the Big ?

die-troll.com/2012/03/16/prenda-sloppy-second-file-phantom-base-part-2-case-312-cv-02049-af-bobrogs-how-john-doe-and-josh-hatfield-josh-hatfield "who faces a negligence charge."

Gibbs does have a nice little caveat in the complaint that states it is possible Hatfield is also the John Doe and they reserve the right to amend the complaint as needed. I guess this is their way of trying to avoid a counterclaim of harassment by Mr. Hatfield for trying to settle a copyright infringement claim. I don't see the point, as they are still trying to scare and harass defendants into paying a settlement. I think Prenda believes they can tell the judge with a straight face that *"they don't think Mr. Hatfield is the infringer,"* but it is a possibility, and even if he isn't, his negligence at a minimum allowed it to happen. Not that Prenda really cares about possible defendant guilt or innocence. They only want to generate settlements and the possibility of innocent parties only messes up their business model. In their eyes, all the defendants are guilty.

Summons

On 3 May 12, Prenda actually had the court issue a summons for Mr. Hatfield. Seeing that entry was a bit of a shock. *OK John, it appears you have started to try to serve some of the Does.* As of this posting, I didn't see a return of service in PACER. [summons_02049\(CA\)](#)

pissed off Doe on V Your Story?


Raul on Prenda Cornholers Motion D...

Dan on What is Your Story?

Raul on Judge Stop Release of Subscri...

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Posts –
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» LiveWire Holdings: Evoluti
Prenda's Fd
» LiveWire H 

Ex. 14


Prenda Law Inc. | DieTroll | Who n Afraid of the Big ?

die-troll.com/2012/04/25/prendas-afraid-of-the-big-bad-wolf-prends-law-and-the-phantom-john-doe-case-312-cv-02049-af

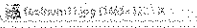
is a bit different from John and you don't appear to be on a drunken rant. But you did use "Your" when you should have used "You're" in a sentence. Grammar is not the point here, so I digress.

Yes, hiding the Prenda/Steele activity makes it a bit harder for all of us, but it still reaches the light of day eventually. This repulsive business model started the same way in the Federal system and now because of our actions, is moving on to new uncharted ground. I'm sure some of our friendly lawyers will enlighten us on the veiled "30 day" reference. That or the affected Does will find us via Google and the fun begins. You claims of great success in the courts is the usual Troll bravado. Yawn..... We understand we will not be successful all the time, but we are one hell of a thorn in your side. The thorn will fester and your operations will suffer for it.


Did you get a chance to read the EDNY order yet? Just in case you missed it.

<http://ia600709.us.archive.org/6/items/gov.uscourts.nyed.321301/gov.uscourts.nyed.321301.pdf> 

Ex. 15

You are "Wong" Mr. Gibb: 


dietrolldie.com/2012/04/19/you-are-wong-mr-gibbs-prenda-law-hard-drive-productions-motion-to-dismiss-is-denied-412-cv-00489/

 **doecumb says:**
May 2, 2012 at 12:06 am

Excuse the cross post from SJD's site.

The Revolution vs. Aspx case that the stain-ful Steele logic depends on does not seem entirely comparable. Gibbs/Steele/Prenda may be hoping for more FUD & hiding weak reasons since the related cases are complicated to review.

It stills seems like Gibbs, "Steve" John Steele and Prenda are saying "we promise to be trustworthy even though we have a long record of not being trustworthy". Why not treat wolves to free bottles of steak sauce to discourage their attacks ?

 **Anonymous says:**
May 2, 2012 at 1:26 am

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Ex. 16


Sneaky Troll Attempts a Flanking Move and is DENIED in the Matter of a Petition By Ingenuity 13 LLC, case 2:11-mc-00084

--- Seth Abrahams' Opposition to Hard Drive Productions' Motion to Dismiss, Case # 3:12-cv-01008 --- 1st Amended Complaint, Seth Abrahams v. Hard Drive Productions and Does 1-50, Case # 3:12-cv-01008 ---



Sneaky Troll Attempts a Flanking Move and is DENIED, In the Matter of a Petition By INGENUITY 13 LLC, case 2:11-mc-00084 (Troll Gibbs)

Posted on March 26, 2012

Well I got to give it to the sneaky minds at Prenda Law. As you may have notice the case title in this post is missing the "v. Does 1-XX" or "swarm associated with hash # XXXXXXXXXXXXXXXXXXXX." That isn't an error or omission on my part. I didn't hear of this one until a recent Tweet alerted me to what was attempted by Brett Gibbs in the Eastern District of California. *In the Matter of a Petition By INGENUITY 13 LLC, case 2:11-mc-00084.*

 To keep this ship afloat and viable with the constant attacks from all sides

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Ex. 17



sophisticatedjane DOE says:

April 20, 2012 at 2:11 am

Good news. Judge denies troll's motion for reconsideration. I think it was a bad idea for Gibbs to claim that judge had exceeded the Magistrate Judge's statutory authority, especially with first-rate opposing attorneys. What an arrogant prick...

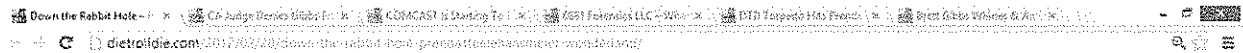
In addition, judge adds to the case law that a person whose information is being sought does have a standing: Prenda recently pushes the opposite idea, they even specifically and deliberately seek discovery orders not from the court where a case is pending, but from a different court — to argue the lack of a fighting Doe's standing, which is a blatant abuse of the rule 45 (we'll hear about this particular sleaziness soon).

Reply

Pinback: [Your 5th Amendment Rights At A Copyright Troll Deposition | Die Troll Die](#)

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Ex. 18



I agree many "defamation" suits these days are garbage (like a celebrity or politician suing a satirist because they don't like a parody). But let's be clear about what Prenda was doing.

They publicly accused Abrahams of being a criminal, while pressuring him to pay them to stop publicly accusing him of being a criminal. This is the definition of blackmail, and Prenda's profit motive makes it absolutely inexcusable; I hope Yuen hears from every person named as one of Prenda's Top Pirates and each and every one of them sues Prenda for all they are worth (which we now know is up to \$54 million). Think about that, there were at least 25 Top Pirates, and now every one of them is another potential lawsuit against these chumps.

This is what libel and defamation laws are for, not for threatening someone who disagrees with you.

Follow

Ex. 19

CA Judge Denies Gibbs' ...
detroitdile.com/2012/02/22/pa-judge-denies-gibbs-expedited-discovery-of-115-conspirator-gibbs-214-cv-0247/

to do it, I would pay the \$350.00 filing fee.

Just a thought...and I'm serous about paying the \$350.00 filing fee.

Reply



Hansmeier says:

February 24, 2012 at 8:58 pm

RE: Gibbs' (Mis)adventures

That's what happens when Prenda employs a brain-damaged attorney

Sooner or later John will have to pimp his blonde to cover his a\$\$!

Reply



anonymous says:

February 24, 2012 at 11:28 pm

She has had the surgery for it, that's for sure.

Follow

Ex. 20

ESB1 Forensics LLC - Wh...
detroitdile.com/2012/02/28/ESB1-forensics-llc-what-s-oh-ye/



skruuball says:

February 3, 2012 at 11:24 pm

Yet one more reason why these efforts at extortion will never see the inside of a courtroom. Legitimate forensics firms with real expertise build their reputations carefully. These haeks, and the others like them, do not ever want to be forced to defend their assertions in a public forum.

Reply



bing says:

February 4, 2012 at 8:26 pm

this is a good find. It will in fact cause them a major headache in any actual litigation.

Follow

Ex. 21

DTD Torpedo Hits Prenda Case 1:11-CV-09064, Pacific Century International LTD., v. Does 1-31, Troll Paul Duffy

Posted on January 14, 2011

Update – IL Judge Strike DTD Torpedo. [Torpedo_Striken](#)

Well I can honestly say I'm a little upset with this, but life and the war goes on. The only person who seems to be happy is John Steele. As it stayed up for a while on PACER and I have it on SCRIBD, the information will not die. There was no information as to the reason why it was stricken, but as the IL court has favored the Trolls, it doesn't surprise me. My other torpedo should have reached the DC court and Prenda by now. As it is in the DC courts, I can only hope the judge is bit more friendly than the IL one. As it takes a strike at 6881 Forensics LLC, I can see what got John's panties in a bunch. Media Copyright Group, 6881 Forensics, etc.; this is the basis for what gets Prenda and the other Trolls their subpoenas granted. Destroy this and their operation takes a dive. Don't lose faith and keep telling the Trolls to bring it on. They don't want a full-out trial, only your money.

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Ex. 22



there are a couple interesting cases being overseen by magistrate judge Donna M. Ryu (see Pacific Century International LTD., v. Does 1-101) where she severed all but one Doe and forbid Gibbs from taking any action against Doe 3 once he is identified (specifically forbid sending settlement letters) until Gibbs files additional requests for discovery.

Prenda also apparently has decided to pack up and move the scam to the California Eastern District where he recently filed a new batch of mass Doe suits. Slightly different formula, they are titled Plaintiff v. Unknown and the complaints have one Doe and the remaining IPs are "Co-conspirators" but it looks like essentially the same formula although IANAL. I think they literally are just trying to avoid filing more cases with titles like "X v. Does 1-156" because the scam has become so recognizable to the courts and because we are keeping an eye on them. Same way Steele ; Hansmeier changed names to Prenda and Steele went to ground and made Duffy the front man. I think they actually think this stuff will fool people and put us off their scent.

Also interesting to note that in this case, even going so far as to depose the Doe was a reactive move. I suspect they would have preferred to stall more, maybe keep working on the Doe with more calls and letters and not have to actually spend time on this case for just one Doe, but the court forced his hand and he had to do something to save face. With the rep he is earning for himself I don't think he wants to be too blatant about dismissing a case "every" time a judge expects him to actually litigate it.

Ex. 23

Abusing a loophole in an exotic Pennsylvania law

It came to my attention that on 12/24/2013 Prenda tested a new turf (not exactly new — it was tried by others before, somewhat unsuccessfully: read along). Prenda filed a motion for leave to take pre-complaint discovery in the Court of Common Pleas of Philadelphia on behalf of a non-existent plaintiff Guava LLC, trying to get identities of 40 Internet subscribers with a sole goal to harass and blackmail them into settling or doing some dirty job.

In short, this exotic law ("Writ of summons") allows subpoenaing ISPs before filing a complaint (without any commitment to file it later). In other words, this law is a cousin of Florida's Pure Bill Of Discovery, heavily exploited by both John Steele's and Keith Lipscomb's Mefias.

Readers of this blog remember that Liberty Media tried to exploit the very same loophole in the Pennsylvania civil law half a year ago. At that time, Marc Randazza was an in-house counsel for Liberty Media Holdings, and I believe that the idea of this fighting blitzkrieg was his. For a couple of reasons, it was a failure. Particularly, Mark Randazza's local counsel on that case, Jordan Rushie, realized that this way to "protect copyright" is inherently wrong, essentially resigned (dismissed the case) and since then has been defending many Does — victims of predatory shakedown lawsuits.

It is hardly a surprise to those who follow Prenda and other trolls: cockroaches tend to explore cracks in the floor (in this case, in the floor of the US judicial system).

An incredible mix of irony, shame and loathe

Here is the Memo in support of the motion (the other documents are linked at the bottom of this post)

Follow

Ex. 24

Connecticut defendant strikes back at AF Holdings with articulate counterclaims

Posted: January 20, 2013 by 530 in Not so serious, Prenda
Tags: AF Films, AF Holdings, Anti-Piracy Law Group, Disrespect, Routh Sweet, copyright, copyright troll, Daniel Ruggiero, Fraud, John Steele, prenda law

While Dan Booth and Jason Sweet are currently involved in multiple battles with Prenda's local goon and swindler Daniel Ruggiero in their home state of Massachusetts, sometimes the defenders move their troops to other states.

Friday's Connecticut campaign delivered an (un)expected strike in *AF Holdings LLC v. Elliot Olive* (MAD 12-cv-01401). The heroes and villains are the same, plus a local CT attorney Frances Codd Szwarc on our side.

As usual, it is easy to feature Booth Sweet's pleadings; neither translation nor annotation necessary. Just a numbo-jumbo "defendant denies the allegation in paragraph..." have a quick look at 23 (!) affirmative defenses-9, and proceed to slavily enjoying the counterclaims on page 10. There are four of them:

1. Declaratory judgment on non-infringement
2. Abuse of process
3. Copyright misuse
4. Defamation

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Ex. 25

Like this: * Like 2 bloggers like this.

➔ A “defendant” in a Guava sham lawsuit has admitted that he was blackmailed into participating in a fraud 66

Posted: January 26, 2013 by SID v. Guava/Lightspeed, Prenda
 Tags: Alpha Law Firm, bittorrent, brott gibbs, copyright, copyright troll, extortion, hard drive productions, john steele, lawsuit abuse, Michael Dugas, paul duffy, prenda law

It was obvious that a rash of CFAA cases filed in state courts by Prenda con artists — *Guava v. Skyler Case* (Cook county, IL), *Guava v. Spencer Merkel* (Hennepin county, MN), and *Arte de Clavaca v. Stacey Mullien* (Cook county, IL) — were sham lawsuits that employed the same scheme:

- Find a poor guy or girl who was “caught” either breaking copyright law by sharing copyrighted material (pornography) using Bittorrent protocol, or accessing a pornography website using stolen credentials. And by “caught” I don’t mean that his or her IP address was simply recorded by a purported forensic expert, such as Peter Hansmeier and his unregistered, illegitimate company “6881 Forensics,” or Steve “Lightspeed” Jones’ “Arcadia Security” with its few scripts that parse server

Ex. 26

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Got it?

The entire text was shamelessly lifted from Rushie’s memorandum! Word to word.

I asked Jordan, and the answer was predictable: **his firm has nothing to do with it.** The fruit of his work (elbeit adversary at that time, but still a decent work) was stolen either by Steele or his PA local counsel **Isaac Siepner.** (I apply trolls’ misleading terminology, which they hypocritically use when whining about pirates “steeking their clients’ precious pornography.”)

As for the local attorney Isaac Siepner... Many local counsels deceived by Prenda turned out to be ethical attorneys (George Banas, Jonathan Torres, Matthew Wasinger, Trino Morrison...) and would not even think about associating their names with Prenda scumbags if they knew how much their cores are rotten. Seeing that, I would not rush and blame an underemployed attorney; I hope he will smell the stink of decay that the criminal organization Prenda exudes and will resign from this case — the sooner the better. If he was the one who pilfered Rushie’s text, he deserves some beeing, but it is a much lesser crime than to make **any** deal with Prenda.

Last, but not least: abusing the law in Pennsylvania is one of the stupidest things John Steele’s hubris can conceive: there are certain superior attorneys there who will have a field day with John’s ill attempt to defraud justice, and they will take the matter as close to personal as their genuine professionalism allows.

Documents

- Motion for pre-complaint discovery

Ex. 27

Prenda Law - Fight Copy

fightcopyrights.com/2013/01/25/prenda-law-36/

➔ Prenda's fraudulent activity continues unabated: new harassing calls, ransom letters etc. 36

Updated January 25, 2013 by 630 n Prenda
copy, AP Holdings, Anti-Piracy Law Group, bitterroot, freit gibbs, copyright, copyright troll, demand letters, education, harassment, hard drive productions, Ingenuity 13, john stovin, Mark Lutz, paul duffy, Paul Pflüger, prenda law, Quad International

Recently I heard too many reports that Steele Hansmeier / Prenda Law / Anti-Piracy Law Group has intensified its harassing calls. And the crook on the other end of the phone line is no one else but previously "retired" (or rather fired -- after he feckishly disobeyed his master's order to move to Las Vegas) **Mark Lutz**.

These calls are beyond fraud.

- The caller does not identify himself, which is a serious violation of the FDCPA (yes, some lawyers think that Prenda's phone campaign can be categorized as a debt collection -- albeit there is no debt). I'm sure it is about other regulations.
- Mark Lutz claims that he calls "from Prenda Law," a nearly defunct law firm that is not in good standing with the state of Illinois: the beast is changing its skin these days, becoming "Anti-Piracy Law Group."
- Mark Lutz refers to dismissed lawsuits as if they are still alive, mentioning such "plaintiffs" as Hard Drive Productions, Bay Racer, etc. Especially egregious is Hard Drive Productions involvement. Its owner Paul Pflüger is probably selling his pants every morning, as memories start to kick in after the wet slumbers recede. Memories of the **countersuits**, citizen activity informing his neighbors and schools about the legal porn production in his home, and, on top of it, the current FBI investigation of the underage pornography allegations. Will **anyone** in his shoes even **think** of initiating a new lawsuit as Mark Lutz promises? Add the fact that Prenda dismissed all the "real" plaintiff cases, leaving only ones that involve questionable, most likely fake (and in any case fraudulent) entities AP Holdings, Ingenuity 13, and Quad International.

Follow

Ex. 28

Prenda Law - Fight Copy

fightcopyrights.com/2013/01/25/prenda-law-36/

Anonymous says:
January 25, 2013 at 11:53 am
0 0 0 [Rate This](#)

Got a couple of calls yesterday. The case I was involved in was voluntarily dismissed twice. This feels like a last minute Prenda cost-strat.

Reply

That Anonymous Dude says:
January 27, 2013 at 11:54 am
0 0 0 [Rate This](#)

You were voluntarily dismissed twice for the same thing? The case is, in justice, like you're looking across a field. You've been effectively found not guilty or dismissed with prejudice, and I'm not sure if they're even supposed to be making contact with you.

Reply

Anonymous says:
January 28, 2013 at 2:33 am
0 0 0 [Rate This](#)

Yes, it was for the same case. I assume they're calling you to see in what shakedown situation you are and trying to get cash before they get Prenda, leave the country, or go to jail. Ask some chicks one will cause hell.

That Anonymous Dude says:
January 28, 2013 at 11:55 pm
0 0 0 [Rate This](#)

Some judge in both cases? Actually, **hell** it. Even if you don't, if you've got recordings and an official record of harassing calls from your provider, send that shit to both judges along with info on the cases. If I were you, I'd actually answer the phone and BIP WFO crap. That's me, I have an ankle problem, and if I'm unreachable in that case, that I'm gonna follow. But suggesting that it's because God knows what they'd cook up. They've already shown that they're more than willing to do nearly anything to make a buck, including manufacturing lawsuits.

Follow

Ex. 29

As you should understand from our previous letter, our firm has been retained to identify and pursue individuals who use the Internet to violate one of our clients' computer systems. The lawsuit, filed October 17, 2012, alleges that the primary defendant, and

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Again, on the surface:

- "Client's secured website" is unreasonably vague.
- Claims are "very serious," my ass.
- "Severe monetary damages" is also unreasonably vague.
- How does Prenda/Anti-Piracy Law Group know a lawsuit like this will cost over 100K to litigate through a jury verdict?
- The letter poses two questions but does not really answer them.

Update

1/25/2013

- According to comments and personal emails, people receive a lot of such calls, majority (if not all) refers to dismissed cases.
- There is a couple of reports that while the voice undoubtedly belongs to Mark Lutz, the caller identifies himself (when he identifies himself at all) as Jeff Schultz. I'm investigating this claim and will followup.
- Some calls reportedly come from 703-272-2013, there is a set of interesting reports about this number, suggesting that the Prenda spoofs the caller ID.

While "Prenda" has a rather neutral term (please don't start the "Prenda" joke), obviously the original enterprise has managed to embed the desert as a shield against its very name: one simply cannot be sure as to who's left. It's not if a plaintiff would desire that for a sin-sinners. Or a sin would desire that be a sinners, John Steele does not even take the fact that he uses the same name regarding the other sinners: he

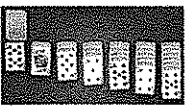
Ex. 30

➔ **How do you call a lovemaking act without a partner?** 13

Posted: January 21, 2013 by 630 in Guava/Lightspeed, Not so serious, Prenda
 Tags: Anti-Piracy Law Group, bitorrent, Booth Sweet, copyright, copyright troll, Daniel Ruggiero, extortion, Guava LLC, Guava v Skyler Case, John Steele, Lightspeed Media, paid duffly, Paul Hansmeier, prenda love, Steve Jones, Slave Lightspeed

You are correct.

In the meantime, John Steele discovered a new concept of *judicial masturbation*: a **one-party lawsuit**. Seriously. We all know how Prenda crooks have been doing a hard work of depriving people a say in the court, the very people they rape (again, in a judicial sense). First, scam artists argued that since subpoena is issued to an ISP, John and Jane Does have no standing to quash it. Didn't work. Then a new trick was pulled out of the bag: to issue a subpoena not from a jurisdiction where a lawsuit is filed — with a sole goal to confuse John and Jane Does, as well as judges, making it unclear what court they should file their motions to quash with. Admonished by a couple of judges, trolls did not give up and came up with a concept of "co-conspirators" (not defendants — no standing), masking a mass shakedown lawsuits as single-defendant ones... If only this creativity was used to serve the society, not to rob it!

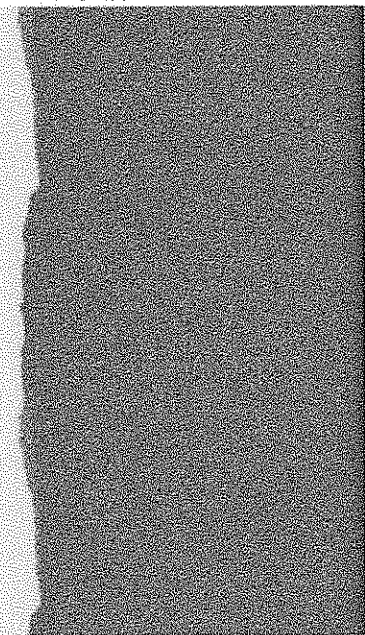


As the culmination of this crookery, John Steele (using an East Coast goon Daniel Ruggiero as a mouthpiece) declared that the **sole defendant he is suing had no standing**. I'm not joking.

This mind-boggling event happened in a federal case *Guava v John Doe* (12-cv-11880) in Massachusetts. I wrote about

prenda law Fight Copr...

http://www.fightcopr.com/.../prenda-law



➔ Is Prenda calling it quits or cooking a new fraud?

43

Posted: January 7, 2013 by 530 in Prenda

Tags: AF Holdings, Anti-Privacy Law Group, Infrarrent, Roy Ruter, copyright, copyright troll, CP Productions, First Time Videos, Ingenuity 13, John Steele, Millennium TGA, Openmind Solutions, Paul Hansmeier, prenda law, Quad International, Sunlust Pictures

During the seasonal festivities, we missed an elephant in the room. In December 2012 notorious copyright troll Prenda Law started dismissing its individual cases by large numbers.

In the *Forbes*' article, John Steele bragged that "he files 20 lawsuits a month, and would like to increase this to 300."

Those of us, who know this miserable individual, did not believe a single word. Moreover, I speculated that the blizzard of individual lawsuits was the last grand bluff, last attempt to extort ransom payments before abandoning the sinking ship. Steele also bizarrely stated that individual lawsuits brought more money to him than the mass ones. Any rational person understands that this is an absolute hogwash. While filing all these cases is feasible (though costly), maintaining them is way beyond Prenda's capacity, even if Prenda manages to triple the number of underemployed scumbag lawyers — like Jacques Hazaine from Georgia, or Jonathan Tappan from Michigan. As I had predicted, in most cases defendants were not even served:

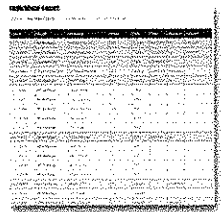


Table of 61 versus Prenda cases

“ Sure Steele and his goons still can make an effort and heave a couple of summons, but what about all the *secretly* moved cases that got in *discovery* all over the country? What will they do with this

Follow

prenda law Fight Copr...

http://www.fightcopr.com/.../prenda-law

- Ingenuity 13
- Quad International

AF Holdings and Ingenuity 13 are offshore (and possibly even outright fake) corporations that are in the center of "Coopergate" — allegation that Steele and his gang forged the signature of their purported CEO Alan Cooper, using identity of a man (real Alan Cooper) against his will or even knowledge.

I know almost nothing about Quad International, but definitely, it makes sense to investigate this "corporation": the majority of undertakings by Steele and Hansmeier are tainted with fraud, so there is a viable chance to unearth another scandal.

I cannot read crooked minds, and undeniably, we don't have enough information to speculate about both why all these sudden dismissals are taking place, and why the most suspicious "plaintiffs" were spared at this time. I hope that Prenda's impudent fraudulent activities have finally caught attention of law enforcement, and the crooks are on the run. I will be happy to find out readers' opinions.

I did not want to spend all my weekend checking every lawsuit, and I hope for help with filling out this table.

Two questions of the day

- Is it wise to settle with Prenda today?
- Was it ever?

Flattr Tweet 9 +1 0 Like 1 Submit Share

1 point Email

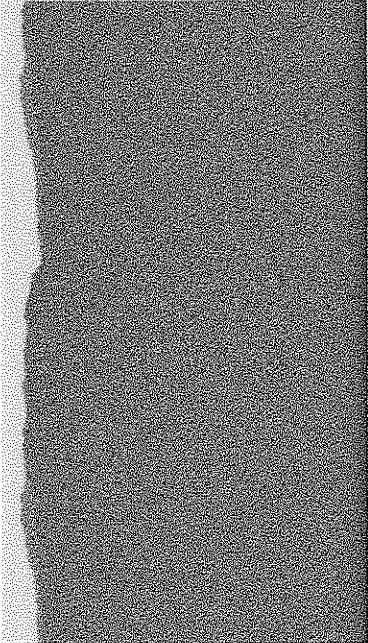
Like this: * Like One blogger likes this.

Follow

Ex. 33

genesis - Light Eye

http://copyrightgibbs.com/2012/12/30/



42

➔ Does “under penalty of perjury” mean anything? Apparently not for Prenda and one of its plaintiffs

Posted: December 30, 2012 by SJD in [Polls](#), [Prenda](#), [Sunlust fiasco](#)

Tags: [Anti-Piracy Law Group](#), [bittorrent](#), [brett gibbs](#), [copyright](#), [copyright troll](#), [daniel weber](#), [john steele](#), [kynes markman & felman](#), [mark lutz](#), [paul duffy](#), [paul hammeier](#), [prenda law](#), [surlust pictures](#), [sunny leone](#)

As I reported last week, copyright trolls John Steele, Paul Duffy, Brett Gibbs (and Mark Lutz) hired the “best law firm in Tampa for white collar criminal defense,” Kynes, Markman & Felman, P.A. (“KMF” below), in an attempt to avoid sanctions after an embarrassing yet entertaining *Surlust Pictures v. Nguyen* (FLMD 12-cv-01685) hearing on November 27, 2012. In my opinion, the can artists simply could not risk fighting the defense attorney Graham Syfert’s motion without an outside counsel, as it would result in another hearing with all the perils of answering judges’ questions under oath.

As a part of the argument against sanctions, four declarations/affidavits were attached to the KMF’s response (by Daniel Weber, Paul Duffy, Brett Gibbs, and John Steele).

Besides a coordinated attack on Graham Syfert, these exhibits also meant to explain the November blooper in detail, covering possible questions — in order to avoid further scrutiny by the judge.

Follow

Ex. 34

prenda law - Copyright

http://prenda.law/2012/12/22/white-collar-criminal-defense/

I tweeted to both Weber and Leone advising them that lying under oath is never a good idea.

SJD says:
 December 22, 2012 at 4:55 pm
 0 0 0 [Rate This](#)

Yes, I wrote them twice. And will continue supplying the news. The second e-mail (yesterday):

“

” FYI: “White collar criminal defenders” attempt to defend Prenda’s scam artists. Surfacing of a new evidence of others’ identity misappropriation by Prenda

To be clear: we don’t have anything against you personally, you do your job and do it professionally. Yet since we consider your clients the worst representatives of our society and do everything in our ability to accelerate their downfall, this case will continue to gain publicity. I expect bigger media outlets (TechDirt, ArsTechnica, Wired) to spread the news pretty soon.

Have nice and happy holidays,

SJD

P.S. As I wrote this, I found out that TechDirt (1M daily pageviews) published a big piece about Prenda (based on my work). Enjoy!

SJD says:
 December 23, 2012 at 4:27 pm
 1 0 0 [Rate This](#)

Follow

Ex. 35

Not surprisingly, the news comes from Massachusetts, where Daniel Booth filed a **joint motion for costs and stay of proceedings, and for protective order** in *Guava v. John Doe* (MAG 12-cv-11650). Basically, this document, besides asking what its title implies, describes the very same instance of Prenda's douchebaggery that I wrote about in the last Guava update, but does so using more details and a much better language.

I do not want to write a full-blown post and analyze this document. Firstly, so many events have been happening lately on the troll battlegrounds if I dive in the details of each of them, I will have to spend 24/7 on this issue, which is less than desirable during the holidays season. And secondly, documents written by Dan and Jason are always well articulated and, as a rule, do not require additional comments.

If you don't know anything about Guava/Arte de Casaca scams (Derived from the Lightspeed's fraudulent lawsuit) and want to fully understand both the subject and the beauty of the following document, you should familiarize yourself with the history of these lawsuit abuses.

John Steele, during his drunken outbreak of rage thought he vindicated only Erin Russell and her clients. It never crossed this narcissistic moron's mind that Erin also might be a local representative for someone else. In this case, "someone else" happened to be Booth Street, whose attorneys are several leagues above Massachusetts Prenda's counsel Daniel Ruggiero, so I pity the poor scumbagi: he will feel a lot of heat soon (he is currently being confronted by superior attorneys in several states). His masters, criminal masterminds from now being abandoned ship Prenda, are not in much better situation. Readers of this blog know this.

Case 1:12-cv-11889-FDS Document 7 Filed 12/13/12 Page 1 of 19

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

GUAVA v. JOHN DOE	1
Filed:	2
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Case A No. 12-CV-11889-FDS

Ex. 36

exams, forget a mid-school English exam. Here we talk about basic language comprehension, which any citizen of the United States should master. For readers' and Brett's convenience, I repeat these questions:

1. Is there another Alan Cooper, other than the gentleman in Minnesota who was John Steele's former caretaker, who is or was the principal of AF Holdings, LLC and/or Ingenuity 13, LLC?
2. Will plaintiff's counsel Brett Gibbs produce the original signature to the verified petition, supposedly executed by hand by "Alan Cooper" and notarized, which Mr. Gibbs stated, under penalty of perjury, that he has a copy of in his own possession and control? See in the Matter of a Petition by Ingenuity 13, LLC, E.D. Cal. Case No. 2:11-md-03867-DAD, ECF No. 1, 10/26/11.
3. Will Mr. Gibbs identify his client contact at Ingenuity 13 and AF Holdings, given that Mr. Gibbs purported to speak with his "client" at Ingenuity 13 only two weeks ago?

Last, but not least: While Mr. Gibbs proudly signs his tantrum document as a "Prenda Law, Inc." employee, he (and the judges) should probably be reminded that this corporation is **NOT** in good standing with the state of Illinois, and its crooked bosses are in the process of pulling a machination — abandoning the old corporation (most likely, to avoid writing the annual report and to get rid of bad publicity) and creating another one — with the same people, same mailing address, same website and same goal — mass extortion.

TAC's greeting to judges

Given my strong believe (as I speculated above) that we may welcome some court clerks/judges here soon, I think it is absolutely appropriate to pull a recent TAC's comment from a different (yet related) discussion thread and embed it here:

Ex. 37

since Prenda's good standing lapses and remains lapsed. It also sounds like returning to good standing does NOT make up for any shortcomings that took place while not in good standing!

It will also be interesting to see what defenses Doe-defenders come up with to take advantage of this informant. At this moment, perhaps there is a great opportunity for Does in the individual/named cases to file answers, counterclaims, or motions to dismiss that take Prenda to task for failing to be in good standing. With the changeover to Anti-Piracy Law Group, if Prenda is going to be allowed to dissolve, even if it was intentional, Steele may have just thrown away all the filing fees spent on his wave of individual and named defendant cases!

Reply

Anonymous says:
December 17, 2012 at 3:56 pm
2 0 0 Rate This

SJD, since you have a habit of sending welcome letters to new local counsels, you must have many of them in your address book already. How about sending Prenda's a helpful note regarding their employer's current lack of good standing? Some of these guys may be naive, they may be stupid, a few may even be genuinely evil, but I'd bet all of them are lawyer enough and have a strong enough sense of self-preservation to find the idea of "Personal Liability" utterly terrifying. You may have the means to trigger a collecting pants-soiling and send the rats over the sides of this sinking ship.

Reply

SJD says:
December 17, 2012 at 3:58 pm
0 0 0 Rate This

Great idea! I may try to compile and send out an email tonight.

Reply

[Follow](#)

Ex. 38

My bet is that Prenda is being abandoned. I will be really surprised if this corporation is ever reinstated. The very timing of the new LLC coming into the game (exactly when Prenda loses its standing) suggests that "Anti-Piracy Law Group" is meant to be a replacement, not an entirely new structure. Prenda's "not good" status is most likely a result of failing to file the annual report that was due on October 31.

The first question:

? Why anyone wants to abandon the company that is not bankrupt, that has a nice positive settlement cash flow, not being sued etc.? Only crooks need machinations like this to operate.

(The last phrase was meant to play along with "Bitter Betty," in a desperate hope that she will retract this question.)

While there might be legitimate (not necessarily ethical) reasons for the shuffle, Prenda's current status dictates a couple of practical questions, irrelevant to the "why" asked above. I am ignorant in the part of the law that deals with corporations, and I do not know Illinois regulations either. I have no desire to do a research, yet my intuition tells me that asking these, maybe naive, questions, can convey important information to attorneys, and through them, to judges:

? Can a company that is not in good standing file and/or maintain lawsuits for their real and fictional clients?

? Would a contract signed while a company was not in good standing, be valid? If settlement agreements were made between Prenda and alleged infringers after November 1st, would they be binding?

[Follow](#)

Ex. 39

Comments

The snake is changing its skin again. Your new personal extortionist will be "Anti-Piracy Law Group" « Fight Copyright Trolls says:
 December 16, 2012 at 11:04 am
 0 0 0 Rate This

[...] A couple of short questions about the status of Prenda Law [...]

Reply

James Donnaught says:
 December 16, 2012 at 1:36 pm
 0 0 0 Rate This

Too many of the marks were copying "Prenda" and discovering what assets they are. Not good for business. Am I the only one wondering if they plan to keep on changing their skin every year, just as the annual report comes due?

Reply

documb says:
 December 16, 2012 at 10:48 pm
 0 0 0 Rate This

The LLC corp reporting requirements for Illinois appear to be minimal, though an up-to-date listing of managers/members is required. The \$300 late fee is less than pocket change for Steele. The goal may be to evade something else.

An Illinois LLC corporation with no report after 180 days is "administratively dissolved". This may be one way Prenda gang members hope to dodge responsibility.

[Prenda had to dissolve because of a clerical error, your honor. We had to find new work at we-pretend-to-fight-piracy, your honor. We're a new group that has nothing to do with that Prenda stuff. We need time to get

Ex. 40

The snake is changing its skin again. Your new personal extortionist will be "Anti-Piracy Law Group"

Posted December 14, 2012 by 839 P.M. at website: Prenda
 Tags: Anti Piracy Law Group, litigation, copyright, copyright troll, extortion, john steele, paul duffy, paul frankmore, records law, website piracy.com

It seems that John Steele and his clique is in the process of assuming a new title "Anti Piracy Law Group."

In the beginning, it was "Steele Hammer". The name "Steele" became poisonous as John's derivate spread around the courts's federal judicial districts. Exactly one year ago (on December 18, 2011) "Steele Hammer" was dissolved. A couple of months prior to that, John Steele created "Prenda Law," using his acquaintance Paul Duffy as a nominal (aka CEO) only his name, signature and occasional court appearances were required. Paul Hammer decided to retreat into a shadow of the scam and quit the stage from stage. John Steele "officially" retired too, for fear removing Steele's day to day, execution. He likes to make his active role in Prenda, its connections to the press and, occasionally, in the court. The word is Kathy (to say the least), because there is a plenty of evidence to the contrary.

It took only a year before the majority of judges in the country started recognizing the name "Prenda," knowing every time they hear it. What are fraudsters are supposed to do? Maybe simply changing the name of help?

I bet you know an antitrust filing portal (Weightwatch.com), whose fee grade are smaller than its design to spread FUD, its profit, create activity with the help of poorly educated shills that from outside copyright maximalists, and to further defame it.

The WordPress software powered site is clearly under a takeover by the same designers for sales sending "professional", because of their natural stupidity, the work in progress has become available online and even earned by Google, so you can see yourself that nothing has really changed from the previous incarnation. The title is the only notable change: the brand is now called "Anti-Piracy Law Group" in an attempt to transfer a couple of more names from the patent system bestowed by them.

LLC registration forms are new. By the way, while checking this new LLC, I noticed that Prenda Law's status is "104 (CGB) 13 M02AQ" in the Illinois Secretary of State site. I found this fact interesting enough to see a couple of questions in an additional post.

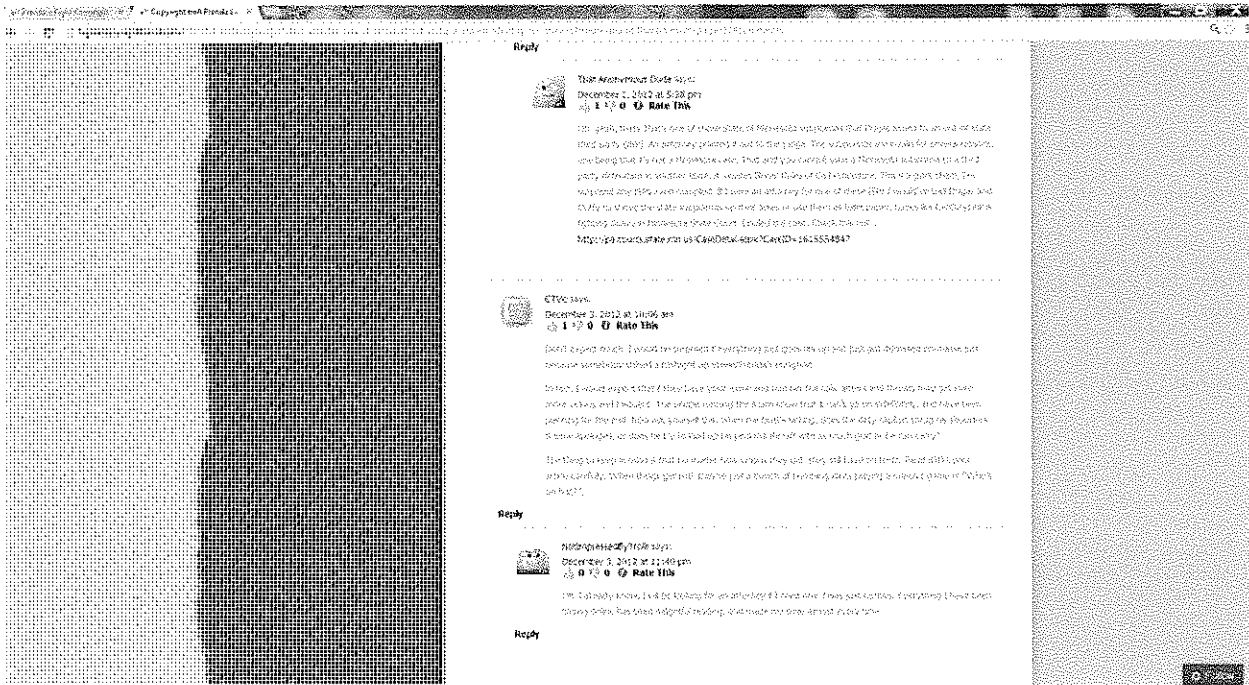
Ex. 41

Ex. 41 is a screenshot of a web browser displaying an email thread. The browser's address bar shows "https://www.fightcops.org/". The page features a dark sidebar on the left with an "ARCHIVES" section listing various dates from 2011 to 2012. The main content area displays an email from "That Anonymous Dude" dated December 12, 2012, at 4:36 am. The email text discusses a protest in Chicago, mentioning a "protest" and "Chicago". The email body contains several paragraphs of text, some of which are partially obscured by a dark overlay on the left. Below the email, there are two "Reply" buttons. The first reply is from "SivaDeSivaTrio" dated December 12, 2012, at 1:45 pm. The second reply is from "That Anonymous Dude" dated December 12, 2012, at 4:36 am. The email thread continues with another reply from "SivaDeSivaTrio" dated December 12, 2012, at 1:45 pm. The browser's status bar at the bottom shows "2012".

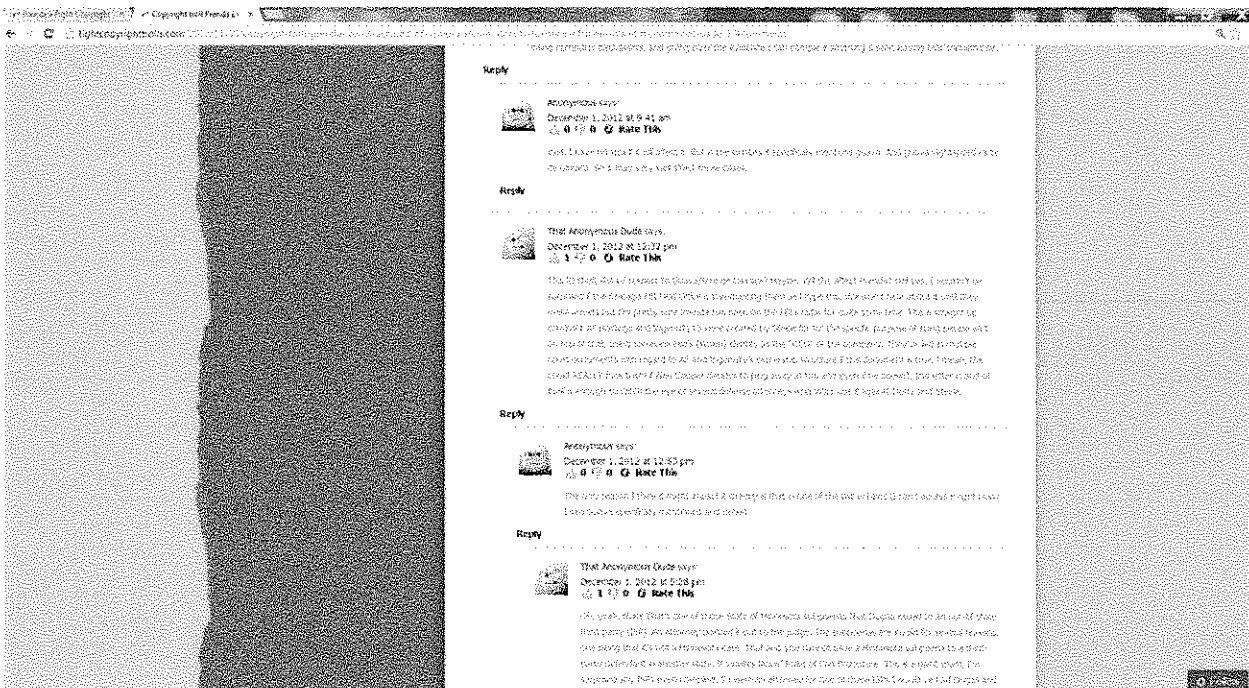
Ex. 42

Ex. 42 is a screenshot of a web browser displaying an email thread. The browser's address bar shows "https://www.fightcops.org/". The page features a dark sidebar on the left with an "ARCHIVES" section listing various dates from 2011 to 2012. The main content area displays an email from "That Anonymous Dude" dated December 12, 2012, at 4:36 am. The email text discusses a protest in Chicago, mentioning a "protest" and "Chicago". The email body contains several paragraphs of text, some of which are partially obscured by a dark overlay on the left. Below the email, there are two "Reply" buttons. The first reply is from "SivaDeSivaTrio" dated December 12, 2012, at 1:45 pm. The second reply is from "That Anonymous Dude" dated December 12, 2012, at 4:36 am. The email thread continues with another reply from "SivaDeSivaTrio" dated December 12, 2012, at 1:45 pm. The browser's status bar at the bottom shows "2012".

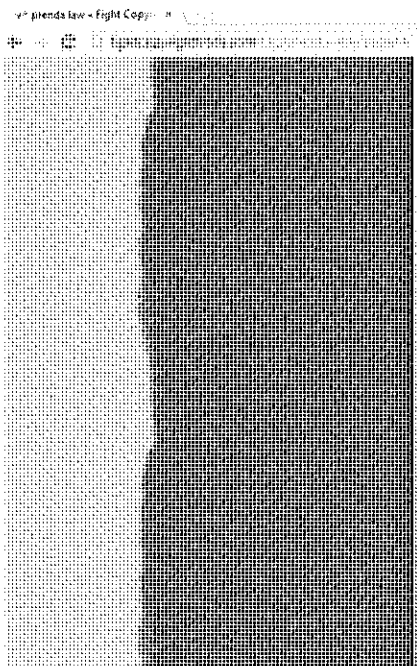
Ex. 44



Ex. 45



Ex. 50



Judge suspects collusion and does not hesitate to openly talk about it, we cannot pretend anymore that Adam plays a fair game and his actions can be seriously excused. He is welcome to comment here, and if he can answer our questions and explain his actions in a way that proves his good faith, I see no problem in assigning, but I doubt such a miracle will happen. At the end of the day, Adam is very young and the crowd won't reflect positively on his future career, especially if the scam is investigated by the authorities.

Conclusion

Since I used more force, David, I'm sure depending much less broken abuses of the court system by copyright trolls, I ran out of epithets. I cannot find proper words that describe this garbage. And it will get even worse: we will for sure witness more fraud if Friends criminals are not deterred ASAP. What can you do? File and file more, do not settle. It is unnecessary and only fuels the extortion machine. There are few situations when one simply cannot afford that his or her name is dragged through court, but most people pay out of irrational fear and the lack of research. If you have money to spend, better spend it on a trusted attorney. And, of course, complain, complain, complain to the media, FBI, Attorney General, Bar associations. One voice can be ignored, ten voices can be ignored, but hundreds and thousands? I do not think so.

Update: 10/04/2012 hearing

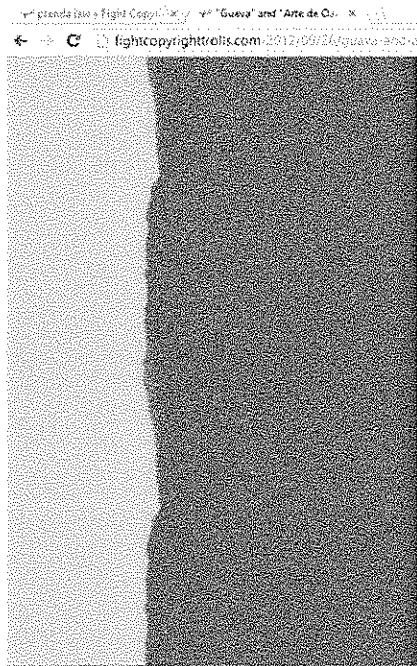
All subpoenas are stayed.

Today's hearing brought no surprises: judge Taylor was still not convinced that the case is adversarial in nature and refused to buy any conspiracy claims. John Steele was swearing and showing tantrums in the courtroom, when he continued doing on Twitter (check his children vindictive tweets today). Illinois Bar Association apparently still thinks that Steele's behavior is a model of professional conduct for others to follow. #facepalm

But I digress. The hearing has resulted in the following *sua sponte* (s) order (I re-typed clerk's handwriting below):

October 4, 2012 12:54 PM EST
NOT RECORDED
Follow

Ex. 51



Reply

That Anonymous Dude says:
October 4, 2012 at 8:26 pm
You won't need a defense fund. Just a judge with eyes of reading glasses. What does me is that the subpoenaed had had a law license.

That Anonymous Dude says:
October 4, 2012 at 8:45 pm

Specifically to getting her 100. Not any other lawyer. Not that one. Not Judge Taylor as grand a 100. Not the lawyer who filed the motion that enabled the Minnesota publishers being involved on out of state parties. She doesn't embarrassed him at all, just did the facts. If she does file against her clients in MN, it's one a copyright violation move as every judge in the district ought to know his jurisdiction by heart. The reason why he (and the rest of the Florida "gang") have their law licenses is because the BARDC works at an INDETERMINATE QUOTE price (see examples below).

Their membership in Illinois are asking the disbarment of a lawyer convicted of smuggling Cuban cigars into the country back in the 1990s.

In pressing for disbarment, the BARDC asserts in its filing that there's an "ethical concern" raised by his "unethical and reflected adversely on his honesty, trustworthiness, and fitness as an attorney." High, indeed. Committed about 20 years ago, now getting around to disbarment.

Back in June the BARDC finally got around to recommending disbarment for a Madison County (see: Justice of the Peace) lawyer sentenced to 10 years in Federal prison for multiple counts of bankruptcy fraud and kidnapping. He was convicted in 2007. 5 years post conviction, still not disbarred?

Another attorney, Bill West in Quincy, was temporarily disbarred for "misappropriating client funds" (credit) beginning in 2009 and he's facing felony charges.

Reply
Raul says:

Ex. 54

prenda law - Fight Copy - Friends is being Apply for

fightcopyingtrails.com/2012/08/09/prenda-is-being-apply-for-licen.../prenda-is-being-apply-for-licen...

Desirable Characteristics

- No clear moral compass.
- Ability to work independently on certain projects like leaving grandmothers, the fiancé, and the current.
- Love of money above all else.
- Good at not being good but being a little evil.
- Not too proficient at Doubledeception.
- Creative in trying to cheat.

Bonus Qualifications (not necessary):

- Knowledge of offshore corporate and banking practices.
- Wanted for the Mafia.
- In depth knowledge of programming technologies as he still hasn't figured that thing out.

NO copyright litigation experience background necessary as we fly by the seat of our pants.
NO NEED FOR LICENSE TO PRACTICE IN CA - If just a strictly paid-for, and still waiting for the results, this is a good opportunity to gain trading experience and make money while waiting for results. Obviously, however, while you are awaiting those results, you will be expected to engage in copyright trading practices such as those our clients have been allegedly doing in Florida.

- Compensation, to be defined based on call the Department of Labor to learn the correct minimum wage.
- CA to highlight this job opening for persons with several disabilities - as listed later and Duffin after all.
- Principals only! Executives please don't contact this job please unless you will be used for copyright subjugation.
- Please do not contact job post with other services, products or commercial interests such as malpractice insurance.

Filed | Tweets 10 | Retweets 5 | Likes 3 | Share

Like this: 1,194 Be the first to like this

Ex. 55

prenda law - Fight Copy - Friends is being Apply for

fightcopyingtrails.com/2012/08/09/prenda-is-being-apply-for-licen.../prenda-is-being-apply-for-licen...

Anonymous 8444
August 10, 2012 at 4:38 am
Rate This

I was not the one who called Steble that Prenda had ordered him to sue with Prenda. For one, he had been the lawyer who was on the case and had been dismissed by Duffy. I Prenda's app. Also, Steble is from a non-competence business perspective. You'd see as a business owner who an employee (attorney, accountant, etc.) can't professionally be taken on directly, then he is within a very short period of time and has said clients with no net P&L. In fact even speaking from my experience within the professional field (I'm a CPA, not a lawyer), non-competence doesn't mean a client standard or holds that are client oriented such as law, law, and public accounting. Upon recognition or termination, I cannot create my professional with a specified notice for a specified period of time (I'm not discussing terms of my non-competence but Prenda would have to be a part and part out of the one to not make an attorney's signature/contract, especially since the terms of the agreements between Prenda and its clients are 100% on spot (aka taking the word). I believe Prenda is not affiliated with Prenda but is a former Steble's friend from his liability arising from Prenda's conduct. It didn't have required the work, it didn't have!

Steble, not you. He is the one who can't prove that Steble is not the partner/master of Prenda. Duffy is just the professional figurehead. Here in the Queen of City of Indiana would be today. The name "John Steble" is as good as a warning of a warning. The judge in the 10th Circuit District of Cook is known by name. Judge Albert Shook told Steble to never bring one of these suits in front of him again so he the Guffy just signed Steble to immediately dismissed. In fact even if Steble meant it as a side to appear or affiliated with it ends so much as he did not of course he kept making the work suit. I do believe Steble is benefiting financially from the and that, although it may be done without law, it is not retired from collecting money from the huge scam.

Being affiliated with Prenda will not take a long to an attorney's reputation and, as in any profession, reputation is everything. If I had been a partner at a top Anderson, I would be unemployed. I would also likely have had good that I only about that with the point, but "Prenda Law, LLC" on your resume and guaranteed, no one will hire you to the lawyers then either make as much as they can, as that as they can, because in some reputable law firm or even not make public defender's office will want to partner then afterward. Their reputation, success, freely market the associated with Prenda, now, they intended.

It should be known that Prenda just used AT&T. AT&T Contact. Take your pro, either of the two firms that only revenue from all of the porn purveyors or clients combined then the app master of Prenda's clients and have legal departments to help them the staff of all of Prenda's said clients. AT&T is still on the For Line 502 and Contact in #99. In my opinion, and I have in others, Prenda just signed its own death warrant. AT&T had

Ex. 56

prenda law • Fight Copyri...

Like this in Like Be the first to like this

➔ A disabled victim of a copyright troll threatens to kill himself 50

Posted August 5, 2013 by 539 in Prenda
Tags: battinross, copyright troll, extortion, john stevie, justice abuse, paul duffy, prenda law

TAC has pointed to a Facebook story (reposted below) of Prenda's victim, a disabled guy who can commit an irreversible action if he doesn't help him.

Words fail me. You know that I'm a rational person who thinks well before acting. Yet if at the moment any of Prenda's minions — John Stevie, Paul Duffy, Joseph Perez, Mary Lou or any of those "total asshole gangsters" — were nearby, I honestly don't know if I would be able to react on my own. Read the story below and you'll perfectly understand why.

If you are an attorney and willing to defend the guy and Junior on a stringent basis, reply to him on Facebook or leave a message here. **And please share this story widely.**

Copyright trolls are murderers and must be stopped. The first blood spurs create a tsunami of public outrage and buys the trolls, but what price too high? Will we wait to react until this God help himself because of Prenda's breezes and a complete failure of the system to hold Prenda accountable?

Update 8/13/2013: Thank you all for the overwhelming support I'm seeing that the author is among us and not desperate anymore. Read his comment below. Not what is going on in this country is **not OK**. There will be no more "business as usual" we will make sure that the ground is burning under the trolls' (and their enabler's) feet. The trolls must be stopped unless it is too late. Read the previous post and be enlightened by the example of a single Doe having triggered a Bar investigation. Please don't be passive.

Let me say this before I tell my story: I live on a fixed income of \$61 and \$9 for schizoid personality disorder, agoraphobia and so on. I also am not guilty of anything and have never been in trouble in my entire life. I am 28 years

Ex. 57

prenda law • Fight Copyri... • A disabled victim of a co...

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➔ A disabled victim of a copyright troll threatens to kill himself

I hope that I speak for 539, TAC and JTD that we are so thankful you found our small community (previously growing larger as great news feed upon feed) and have victim status award after they told that was dismissed twice over 50 for one reason, anger. Hopefully you can help in the future once this lawsuit hassle is behind you. In the meantime, we are always here. BTW some serious shit is going on behind the scenes with Prenda. Just relax and watch.

Reply

Anonymous User
August 18, 2013 at 10:27 am
1 0 0 [Rate This](#)

RAC,

I told you I was just a voice on the net, and I you said you took a chance on my words!! I know I am thankful I was able to find you guys and talk the honest country. You sound in such better spirits, and this is a very good thing. I am hoping you are getting back on track and that Prenda becomes a fond memory soon.

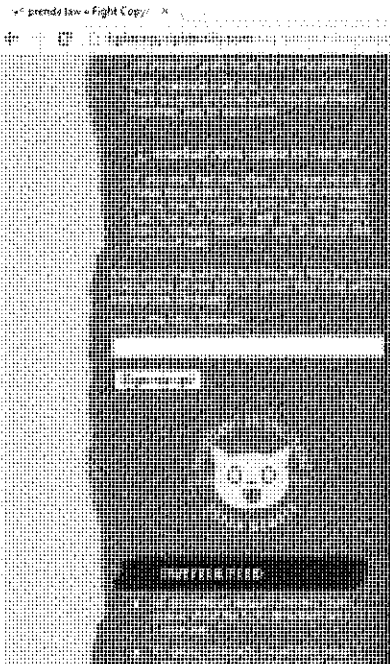
Help Prenda at RAC "releases help".

In the guy on the internet the news exposed you, John Stevie, they left off that I really am a nice guy (not except to trolls). The news doesn't talk about these cases much, but the truth of the matter is... it is a whole lot being done with a few drops of... The hope that fair attorney should make people pay their fair amount of money, guilty or not. They do not sue with a guilty, they just name a psychics. They are about 1 step up from the people who send email saying for help to circumvent of dollars from other countries and get their bank details in your to send some fee money to make it happen. They prey on people and are parasites, and on top to give people the best possible defense... information. If you know it is a scam, and they will say anything to make a buck they would let much less story.

Reply

Anonymous User
August 18, 2013 at 3:55 pm
1 0 0 [Rate This](#)

I like to repeat the sentiment expressed by both Red and TAC and also encourage you to stick around once the harassment stops and you can a off the coast. You seem a bit by staying around, I have had, and it wasn't my choice. It was in between. They offer my domestic, I think around because will be found as well that



➔ Prenda's "Letter of request for informal discovery": an attorney explains why it is patently invalid

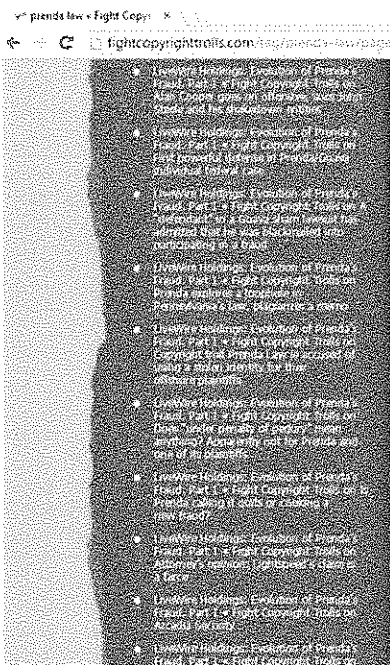
11

Posted July 24, 2012 by SID in Prenda
Tags: Infringement, copyright, troll, David Kier, extortion, informal discovery, John Steele, Joseph Perla, good stuff, prenda law

Last week I wrote about Prenda's new "invention" — sending out letters requesting informal discovery and threatening to file a motion to compel if a recipient does not act. Anyone who follows these cases immediately recognized the real goal behind these letters: to play the number game and hope that at least few unsuspecting Dees will contact Prenda for clarifications, and be conned as a result. As I repeatedly state, talking to a troll is a big no-no; you cannot outfox seasoned fraudsters.

Although these letters are absolute nonsense and do not deserve to be taken seriously, the disrespect of tedious wording is not for everyone, and some recipients will want to reply formally. David Kier, an IP attorney from Colorado, who defended many troll victims, has drafted a reply that is featured below for your reference. If you (or your attorney) is resolved to reply to Steele's halcyon letter greeting card for whatever reason, this is an excellent template to consider. In any case, it is useful to read this reply as it complements my editorial speculations with solid legal argument.

We are in receipt of your letter dated _____, Based on our understanding of the correspondence your client is seeking to preclude informal discovery requests including, but not limited to the production of documents, informal depositions testimony and even access to my client's private computer network. Your letter further indicated that failure to comply with these informal discovery requests will preclude a formal motion to compel compliance. Please note that these requests do not comport with the Federal Rules of Civil Procedure and are invalid on their face. Further, based on a review of relevant Court documents, it appears that such informal requests are not being made within the context of an active and ongoing



➔ Prenda's continuous disregard of ethics leads to a motion for sanctions

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Posted July 23, 2012 by SID in Prenda
Tags: 12-cv-20921, Infringement, copyright, troll, John O'Sullivan, John Steele, Joseph Perla, Lakshandani Simon, prenda law

Magistrate Judge John O'Sullivan (Southern District of Florida) is seemingly too busy to look around and see what's going in the country (or even in his district). A majority of judges is fed up with the ongoing abuse of courts by an insatiable species of pernicious copyright trolls, but apparently not all the judges communicate with each other and some rely solely on the sweet-tongued troll lawyers, who have perfected the tricky art of lying while looking straight into the eyes.

On June 29 Judge O'Sullivan denied motions to quash and for protective order filed by four Dees, represented by Daniel Swain and Bradford Patrick (First Time Videos, LLC v. Dees 1-76, 1:12-cv-20921). The judge declared that "there is a minimal expectation of privacy for information provided to internet providers," apparently not being aware how blatantly this information is misused. Although this ruling is unfortunate, decisions like this become rarer as the case law is being developed and the unprecedented mass abuse of the judicial system gains publicity.

This decision was interpreted by a John Steele's disciple, immature troll Joseph Perla, in a very crooked way: he decided that if motions were denied, defense counsels must have dropped their clients automatically (see Exhibit B linked below). As a result, at least two Dees still (of course!) represented by Daniel Simon of Lakshandani Simon P.L., started receiving harassing mails and phone calls in violation of one of the most obvious and hard-to-interpret Rules of Ethics: **a lawyer absolutely cannot directly contact an opposing party if the latter retained an attorney.**

Thus, Lakshandani Simon had moved for sanctions and requested a hearing. It was not an opportunistic move to attack on

