

UNITED STATES DISTRICT COURT

for the

Western District of Pennsylvania

AF Holdings, LLC

Plaintiff

v.

Rajesh Patel

Defendant

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Civil Action No. 2:12-cv-00262-WCO

(If the action is pending in another district, state where:
Northern District of Georgia)

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Right Ascension, Inc.; 2140 Woodland Rd., Warrendale, PA 15086.

Production: **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material: See the attached Exhibit A.

Place: Blair Chintella c/o Patberg, Carmody, & Ging Deutchtown Center, 801 Vinial St., 3rd Floor Pittsburgh, PA 15212	Date and Time: 08/14/2013 10:00 am
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Inspection of Premises: **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
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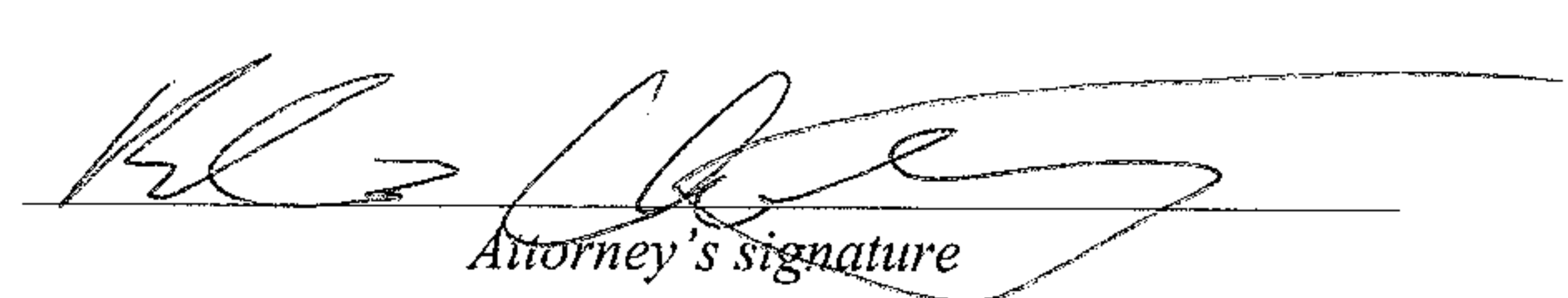
The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date: 07/25/2013

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk


Attorney's Signature

The name, address, e-mail, and telephone number of the attorney representing *(name of party)* Blair Chintella
on behalf of Mr. Patel. _____, who issues or requests this subpoena, are:

2483 Shoals Ter., Decatur, GA 30034; 404-831-5779; bchintel1@gmail.com.

Exhibit A

(Mr. Patel requests that all information be produced on a CD in the electronic format – for example, the PDF file format. If a document cannot be converted into PDF, please put it into another electronic format that is accessible with frequently-used software. A paper printout is a last resort, but is acceptable. Please contact attorney Blair Chintella with any questions to clarify: 404-831-5779.)

1) Any **paper or electronic** document or record created or existing on or after **January 1, 2011** showing Right Ascension, Inc's. (whether through a subsidiary or trade name such as DVD Empire) **purchase or receiving on escrow or coming into possession any other way**, of one or more copies of a copyrighted work titled **"Popular Demand,"** having copyright registration number: PA0001754383. To clarify the scope of this subpoena, "Popular Demand" stars an actress named "Nina Mercedes" and was released in approximately 2011. To further clarify, this request is aimed at documents such as shipping orders from the copyright holder or distributor; purchase agreements showing the quantity, date, purchaser and purchase; agreements to sell on escrow on behalf of another person or entity, etc. Any information such as credit card numbers are **not** included in this subpoena and may be redacted, but this subpoena specifically encompasses the names, addresses, phone numbers, and any other contact information, as well as purchase dates, number of copies obtained, etc.. The subpoena includes but is not limited to invoices, payment receipts, shipping orders, etc. This paragraph #1 is **not** seeking records showing Right Ascension, Inc. sales to its customers.

2) Any paper or electronic document or record created or existing on or after **January 1, 2011** showing any type of agreement, contract, distributorship agreement, exclusive license, agreement to sell on escrow or any other type of contractual arrangement between Right Ascension, Inc. (whether through a subsidiary or trade name such as DVD Empire) and any or all of the following:

- a. AF Holdings, LLC (unknown origin)
- b. Livewire Holdings, LLC (unknown origin)
- c. Heartbreaker Digital, LLC (Nevada)
- d. Prenda Law, Inc. (Illinois)
- e. Duffy Law Group, LLC (Illinois)
- f. Exile Pictures, LLC (California)
- g. Esquisite Distribution
- h. John Steele (individual)
- i. Paul Duffy (individual)
- j. Mark Lutz (individual)
- k. Raymond Rogers (individual)
- l. The actress in "Popular Demand" who is referred to as Nina Mercedes
- m. The husband of "Nina Mercedes"
- n. Paul Hansmeier; and any other person regarding "Popular Demand."

3) Any paper or electronic document created or existing on or after **January 1, 2011**, showing the total number of copies sold of "Popular Demand." This #3 only seeks total sales figures, not any contact information for purchasers, etc.