

**UNITED STATES DISTRICT COURT**

for the

District of Nevada

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: Heartbreaker Digital, LLC; located at 512 Windmill Lane, #311, Las Vegas, NV 89123

**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 Randazza Legal Group 6525 W. Warm Springs Rd., Ste. 100 Las Vegas, NV 89118	Date and Time:  08/21/2013 9:00 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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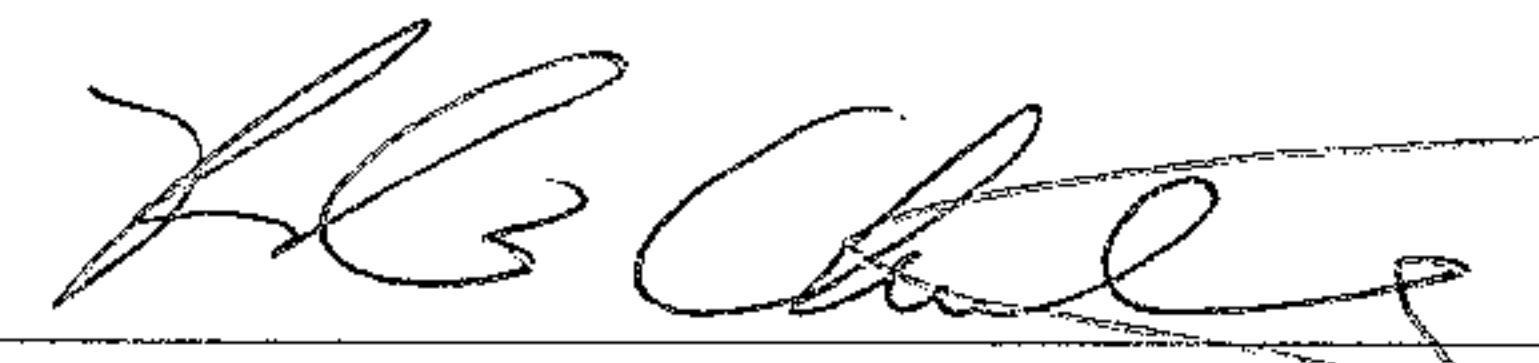
The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

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 Heartbreaker Digital, LLC (or a predecessor or successor) or Raymond Rogers' **creation, purchase, receiving on escrow or any other method by which coming into possession**, 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 contracts with Nina Mercedes agreeing to the terms of the creation of the work, documents evidencing the date that the work was performed, expenses associated with the work's creation, shipping orders from the copyright holder (if other than Heartbreaker Digital, LLC), distribution or 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 also includes but is not limited to invoices, payment receipts, shipping orders, etc.

2) Any and all paper or electronic document or record showing any type of agreement or contract, including but not limited to distributorship agreement, exclusive license, agreement to sell on escrow, purchase, distribute, copy, produce or any other type of contractual arrangement, between Heartbreaker Digital, LLC (or a predecessor company) or Raymond Rogers, and any or all of the following persons:

- 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. International Video Distributors, LLC (New Jersey)
- o. Paul Hansmeier; and

**p. any other person (defined broadly to include any individual human being, company, entity, trust, etc.) that in any way pertains to “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.”

4) Any paper or electronic document created or existing on or after **January 1, 2011**, showing the total of number of copies of “Popular Demand” created, fabricated, produced or otherwise brought into existence.

5) A paper or electronic document showing any and all officers, directors, shareholders, members or other persons have an ownership and/or controlling interest in Heartbreaker Digital, LLC or any predecessor companies.

6) Any paper or electronic documents showing your ownership in or ability to control a web domain (for example: google.com).

7) Any paper or electronic documents in your possession showing websites or domains through which copies of “Popular Demand” are being sold with permission of whoever owns the copyright.

8) Any paper or electronic document signed by Raymond Rogers or Heartbreaker Digital, LLC (Raymond Rogers or any other person) that have been filed in federal or state court by or on behalf of the following persons/entities (please produce the originals unless they no longer exist):

- 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 Mercedez
- m. The husband of “Nina Mercedez”
- n. International Video Distributors, LLC (New Jersey)
- o. Paul Hansmeier; and
- p. any other person (defined broadly to include any individual human being, company, entity, trust, etc.) that in any way pertains to “Popular Demand.”**

9) Any paper or electronic document, e-mail or other tangible thing constituting or forming part of a retainer agreement between Heartbreaker Digital, LLC or Raymond Rogers, and any of the persons/entities listed in #8 above.

A handwritten signature in black ink, appearing to read "Blair Chiatella", written over a horizontal line.

Blair Chiatella,  
Attorney for Defendant