

UNITED STATES DISTRICT COURT

for the

District of New Jersey

AF Holdings, LLC

Plaintiff

v.

Rajesh Patel

Defendant

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: International Video Distributors, L.L.C.; 59 Lake Dr., Hightstown, NJ 08520.

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: David Wisniewski c/o Blair Chintella 230 East Kings Highway, # 285 Haddonfield, NJ 08033 Date and Time: 08/26/2013 9:00 am

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:

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: 08/08/2013

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 International Video Distributors, L.L.C. (“IVD”) (or a predecessor or successor) **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 IVD), 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, credit card billing statements showing payments, shipping orders, audio recordings of customer service calls** regarding a shipment or other business related to “Popular Demand,” 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 IVD (or a predecessor company) and any or all of the following persons:

- a. Heartbreaker Digital, LLC (Nevada)
- b. AF Holdings, LLC (unknown origin)
- c. Livewire Holdings, LLC (unknown origin)
- d. Prenda Law, Inc. (Illinois)
- e. Duffy Law Group, LLC (Illinois)
- f. Exile Pictures, LLC (California)
- g. Exquisite Distribution (unknown)
- 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, distributed, transferred to or from IVD regarding “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 by IVD.

As an alternative to producing the documents to the address specified on the subpoena you may mail them to:

Blair Chintella
2483 Shoals Ter.
Decatur, GA 30034

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