

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA**

AF HOLDINGS, LLC	:	
	:	
Plaintiff,	:	
	:	Civil Action No.
v.	:	2:12-cv-00262-WCO
	:	
RAJESH PATEL,	:	
	:	
Defendant.	:	

**Defendant’s Second Interrogatories**

Pursuant to Fed. R. Civ. 33 and the local rules of this Court, Plaintiff is hereby served this **Defendant’s First Interrogatories**:

**Construction**

As used herein, (i) the singular of any word or phrase includes the plural and the plural of any word or phrase includes the singular, and (ii) “and” and “or” shall be construed either conjunctively or disjunctively to bring within the scope of these requests for production any information, documents or tangible things that might be otherwise be construed to be outside the scope of these requests for production.

**Definitions**

1. “6881” means 6881 Forensics, LLC listed on docket item 4-1 in the Prior Lawsuit.

2. “Alan Cooper” means the Person that purportedly signed the copyright assignment relevant to this case.
3. “Allan Mooney” means Allan Mooney the client of Paul Hansmeier.
4. “ALG” mean Anti-Piracy Law Group, LLC, an Illinois entity.
5. “Alpha” means Alpha Law Firm, LLC, a Minnesota LLC.
6. “Angel Van Den Hemel” means an employee of Prenda.
7. “AF Holdings” means the plaintiff in this Action.
8. “Bessemer” means Bessemer Films, LLC, Delaware and Florida entities.
9. “Brett Gibbs” means the attorney licensed in California that was at one point affiliated with Prenda.
10. “Contact Information” means all legal name, all business and residential addresses, all business and personal phone numbers, all business and personal e-mail addresses, and the Identity of all officers, directors, shareholders, employees, independent contractors, “corporate representatives” or other agents.
11. “Document” means the broad meaning of that term as defined and interpreted under the Federal Rules of Civil Procedure, including but not limited to digital and non-digital document formats, the original of a document and each non-identical copy (whether different from the original

by means of notes made on such copy or otherwise), and – if the original is not in existence or subject to your control – each copy, regardless of origin or location, of any handwritten, typewritten, printed, computerized, electronically stored, recorded, transcribed, punched, taped, photocopied, photostatic, “telexed,” filmed, microfilmed or otherwise prepared matter, however produced or reproduced, including but not limited to all electronically stored information, email messages, letters, correspondence, memoranda, telegrams, telexes, cables, memoranda or minutes of meetings or conversations (in person or telephonic), reports, notes, computer discs, tapes and files, legal documents, electronica data and writings of every description.

12. “File” means the file that Plaintiff alleges that Defendant downloaded via the bittorrent protocol as set forth in Plaintiff’s Complaint, including its HASH value, size, name, and file type (e.g. .mov versus .mpeg).
13. “Heartbreaker” means Heartbreaker Digital, LLC, a Nevada entity.
14. “Identify,” “Identity” or “Describe” means: (a) as to any Individual, their Contact Information, job title; (b) as to any Document, the type of document (e.g., correspondence, memorandum, etc.), where it is located, the format that it is (e.g. electronic PDF, paper, etc.), the Person who has custody or

control of it, and a brief description of the subject matter thereof; (c) as to Knowledge, any information or knowledge concerning the subject matter of the interrogatory posed, including the Identity of any Person who authored or worked on a Document, experiences dealing with the subject matter, actions performed in regard thereto, the identity of persons consulted or from whom information or advice was obtained (regardless of whether it is hearsay), devices used, and events took place or that will take place; (iv) as to any "Settlement," the Identity of the Persons to the agreement, date the agreement was signed by each party, and the amount of any monies paid by any party including to whom monies were paid and when.

15. "Individual" means a human being.
16. "Jayme Steele" means the relative of John Steele.
17. "Joseph Perea" means attorney licensed in Florida that is/was affiliated with Prenda.
18. "Kerry Steele" means the wife of John Steele (aka Kerry Eckenrode).
19. "Knowledge" or "knowledge" means any actual knowledge that a person has, facts told to a person that have not been verified (regardless of whether hearsay), speculation, experiences, and any other information pertaining to a subject matter regardless of whether have been verified as true or not.

20. "Livewire" means Livewire Holdings, LLC.
21. "Mark Lutz" means the Person that claims to be the CEO of Plaintiff.
22. "Nazaire" means Jacques Nazaire.
23. "MCG" means Media Copyright Group, LLC, a Minnesota entity.
24. "MCGIP" means MCGIP, LLC, a Minnesota entity.
25. "Michael Dugas" means the attorney licensed in Minnesota that is affiliated with Prenda.
26. "Paul Duffy" means the purported principal of Prenda.
27. "Paul Hansmeier" means the person deposed as a representative of AF Holdings.
28. "Peg Leg" means Peg Leg Productions, LLC, a Florida entity.
29. "Person" means any individual, corporation, proprietorship, partnership, trust, association or any other entity.
30. "Pertain" and "Pertaining" mean and include: refers to, contains, concerns, Describes, describes embodies, mentions, constitutes, supports, corroborates, demonstrates, proves, evidences, shows, refutes, disputes, rebuts, controverts or contradicts.
31. "Peter Hansmeier" means the brother of Paul Hansmeier.

32. “Peter Hansmeier” means the person identified in docket item 4-1 in the Prior Lawsuit.
33. “Prenda” means Prenda Law, Inc., an Illinois entity.
34. “Prior Lawsuit” means the lawsuit filed in the United States District Court for the District of Columbia: *AF Holdings, LLC v. Does 1,058*; 1:12-cv-00048.
35. “S&H” means Steele Hansmeier, PLLC, a Minnesota PLLC.
36. “Salt Marsh” means the “unidentified beneficiary” trust referred to by Paul Hansmeier in his deposition on behalf of AF Holdings.
37. “Tommy Labriola” means the purported employee of Livewire.
38. “VPR” means VPR Inc., a Nevada entity.
39. “Work” means the allegedly copyrighted work referred to in Plaintiff’s Complaint in this action and the Prior Action.

### **Interrogatories**

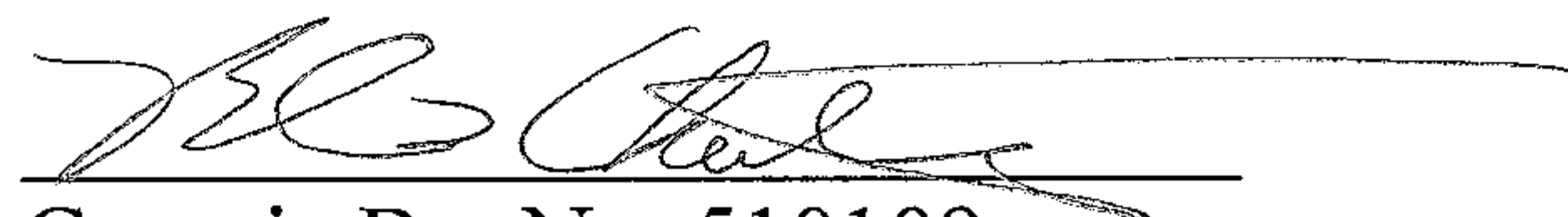
1. Explain whether or not Plaintiff considers the Work is being offered for sale, rental or free streaming as shown by the following websites to be copyright infringement of the Work, Describe any legal action that has been taken with respect thereto as of July 29, 2013, and Identify any Person having Knowledge or Documents Pertaining to such action:

<http://www.cduniverse.com/productinfo.asp?pid=8576207&style=ice> (DVD for sale), <http://www.adultdvdempire.com/1589885/nina-mercedes-popular-demand-porn-videos.html> (DVD for sale and rental), <http://www.redtube.com/177232> (free streaming of entire video), <http://www.pimpbull.com/video/1281810/nina-mercedes-popular-demand> (free streaming of entire video), <http://xxxmsntube.com/1511370/movie-Nina-Mercedes-Popular-Demand.html> (full streaming of entire video), <http://playporn.to/nina-mercedes-popular-demand/> (full streaming of entire video).

This 30 day of July, 2013:

2483 Shoals Ter.  
Decatur, GA 30034  
404-579-9668  
No Fax Number  
[bchintell@gmail.com](mailto:bchintell@gmail.com)

**BLAIR CHINTELLA**



Georgia Bar No. 510109  
Attorney for Defendant