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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

<p>AF HOLDINGS, LLC.,</p> <p>Plaintiff,</p> <p>v.</p> <p>JOE NAVASCA</p> <p>Defendants.</p>	<p>Case No. 3:12-cv-02396-EMC</p> <p><b>Declaration of Nicholas Ranallo in Opposition to Motion to Shorten Time/Motion for Stay of Discovery</b></p>
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**DECLARATION OF NICHOLAS RANALLO**

1. I am an attorney duly licensed to practice in the State of California and before the District Court for the Northern District of California. I am attorney of record for Joe Navasca, and this declaration is based on personal knowledge of the matters set forth herein or, to the extent so identified, upon information and belief formed after reasonable inquiry as described herein.
2. On Friday, February 8, 2013, I received an electronic file from Joe Navasca comprised of a voicemail recording left at his residence on the same date.

Paragraph 5, below, represents my personal transcription of the voicemail message. I have retained an electronic copy of the message and can provide it to the court upon request.

3. Upon information and belief, the individual speaking in the voicemail message is Mark Lutz. This belief is based on my recognition of Mr. Lutz' voice from numerous past conversations with Mr. Lutz in his role as paralegal for Steele Hansmeier/Prenda Law.
4. On Friday, February 8, 2013, I sent a copy of the voicemail to Brett Gibbs requesting explanation. Beyond noting that I did not represent Jovino, Mr. Gibbs provided no information regarding why a law firm that is not formally involved in this case is seeking settlement from an individual that is not the defendant in this case, and/or seeking to amend the complaint to name an individual that was previously "eliminated" as a likely infringer.
5. The following represents my personal transcription of the February 8 voicemail. I have endeavored to be as accurate as possible:  
  
"Yes, uh, this message is for Jovino. It's, uh, Anti-Piracy Law Group giving you a call about a couple of letters we mailed you which had to do with the copyright infringement lawsuit that you are a part of. And..um..yeah, I mean, we haven't entered into a settlement agreement as of yet. And, prior to moving forward and modifying the complaint to add your name, our client just asked us to give you a quick call. You know, I suppose if you want to avoid the expense and time that is associated with a case like this, call us back. We can be reached at (800) 380-0840. Your reference number is 84080. Thank you."
6. The telephone number identified in the message above is the number listed for Prenda Law, Inc., on its wefightpiracy.com web site.

7. The reference number noted above corresponds to prior letters from Plaintiff regarding the allegations of infringement from this case.

SALT MARSH

8. “Salt Marsh” is the individual identified as an “Owner” of AF Holdings in ECF No. 8 in this case, as well as numerous other cases in this district.
9. I am not aware of any individual with the actual name “Salt Marsh” that is associated with AF Holdings or John Steele.
10. However, upon information and belief, an individual named Tony or Anthony Saltmarsh does exist, and has documented associations with John Steele’s family and the mysterious Alan Cooper, as described further herein.
11. Upon information and belief, Tony Saltmarsh previously lived at 4532 E. Villa Theresa Drive in Phoenix Arizona, 85032. This belief is based upon a “past address” search through peoplesmart.com. of the address and Mr. Saltmarsh. A copy of Mr. Saltmarsh’s full report is annexed hereto as Exhibit B.
12. Upon information and belief, Jayme Steele also previously lived at 4532 E. Villa Theresa Drive in Phoenix, Arizona. This belief is likewise based on peoplesmart.com “past address” search for Ms. Steele. A copy of this report is annexed hereto as Exhibit C.
13. Upon information and belief, the 4532 E. Villa Theresa address was also previously used by VPR, Inc., a former Steele Hansmeier client. This belief is based on a review of the Nevada Secretary of State entity details attached hereto as Exhibit D.

14. Upon information and belief, Alan Cooper was identified as, inter alia, the President and Treasurer of VPR, Inc. and likewise associated with the 4532 East Villa Theresa address. This belief is likewise based on a review of the Nevada Secretary of State entity details, a copy of which are annexed hereto as Exhibit D.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this Declaration is executed on this 11<sup>th</sup> day of February, 2013, in Boulder Creek, California.

/s/ Nicholas R. Ranallo  
Nicholas Ranallo