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September 12, 2011

Via Federal Express

Clerk of the Court
United States District Court, District of Columbia
333 Constitution Ave. N.W.
Washington, D.C. 20001

Leave to file GRANTED

Beryl A. Howell 9/30/11
Beryl A. Howell Date
United States District Judge

Re: Voltage Pictures, LLC v. Claudio Vazquez, et al.
District of Columbia Court Case No. 1:10-cv-00873-BAH

Dear Clerk of the Court:

This office represents Edward F. McLaughlin and Suzanne Hanson, in the above-reference action.

Please find enclosed one (1) original and two (2) copies of:

MOTION OF NONPARTIES TO QUASH SUBPOENA

Upon receipt, kindly file the original and return the endorsed copies to our office in the self-addressed, stamped envelope included herewith.

Thank you for your cooperation in this regard.

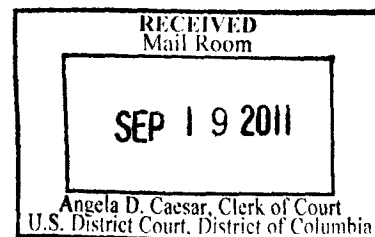
Very truly yours,

Jeanette Smith

Jeanette Smith

Legal Assistant to Gregory P. Einhorn

/js
Enclosures



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UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

)
VOLTAGE PICTURES, LLC)

)
Plaintiffs,)

NO. 1:10-cv-00873-BAH

)
v.)

)
Claudio Vazquez

)
Defendants.)

MOTION OF NONPARTIES TO QUASH SUBPOENA

Nonparties Edward F. McLaughlin and Suzanne Hanson hereby respectfully request that this Court quash the subpoena purportedly served upon Comcast Cable Communications, LLC, or in the alternative declare that no valid subpoena has properly been served upon Edward F. McLaughlin and Suzanne Hanson pursuant to Fed. R. Civ. P. 45.

As grounds therefore, Edward F. McLaughlin and Suzanne Hanson state as follows:

1. Edward F. McLaughlin and Suzanne Hanson live in the State of California. Edward F. McLaughlin and Suzanne Hanson are not located within, or operate any business within, the District of Columbia or within 100 miles of this court.
2. On or about August 22, 2011, plaintiff Voltage Pictures LLC, through counsel, purported to serve on Comcast Cable Communications a subpoena by mail, a copy of which is attached hereto as Exhibit A.
3. The purported subpoena does not set forth a place for responding thereto that is within 100 miles of the residence or place of business of Edward F. McLaughlin and Suzanne Hanson as required by Fed. R. Civ. P. 45 (c) (3) (B) (iii).
4. Moreover, and most significantly, neither of us has engaged in computer file video download or transfer. Based upon a review of the pleadings and discovery in the action, it appears that plaintiff claims illegal file sharing of the movie "Hurt Locker" through internet download via bit torrent clients. In fact, we have never engaged in any such file sharing. The evening in question was August 15, 2010. On that date, the two of us watched the PGA golf championship together. Mr. McLaughlin then, as is not unusual, likely selected the subject movie at

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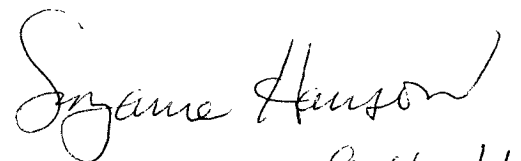
Angela D. Caesar, Clerk of Court
U.S. District Court, District of Columbia

approximately 8:35 PM, via Comcast's "On Demand" service. Accessing the movie was done via the Comcast tuner/clicker and the TV screen. The TV in Mr. McLaughlin's room (he is quadriplegic) is not linked to a computer, nor does Mr. McLaughlin nor his nurse use Mr. McLaughlin's iPad in the bedroom. Ms. Hanson's desk computer does receive high-speed cable from Comcast; however, she does not use it to view movies.

Mr. McLaughlin therefore watched the subject movie via Comcast in the intended manner. The motion to quash should therefore be granted and my clients should not have any personal information released as part of this class action.

Respectfully submitted,


EDWARD F. MCLAUGHLIN

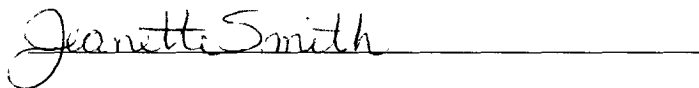

SUZANNE HANSON 9-14-11

384 East 6th Avenue
Chico, CA 95926-3410

Dated: September 14, 2011

Certificate of Service

I hereby certify that on September 14, 2011, I caused true copies of the above document to be sent to counsel for Plaintiffs, by USPS.



Proof of Service

I am a citizen of the United States and employed in the County of Butte; I am over the age of eighteen years and not a party to the within action. My business address is 854 Manzanita Court, Suite 110, Chico, California 95926. I am readily familiar with the practice for collection and processing of correspondence/documents for mailing with the United States Postal Service and that said correspondence/documents are deposited with the United States Postal Service in the ordinary course of business on the same day.

On September 14, 2011, I served the within:

MOTION OF NONPARTIES TO QUASH SUBPOENA

On the parties below by placing a true copy thereof in a sealed envelope and served same on the parties/counsel, addressed as follows:

Nicholas A. Kurtz
Dunlap, Grubb & Weaver, PLLC
5335 Wisconsin Avenue NW, Suite 440
Washington, D.C. 20015-2052

The following is a procedure in which service of this document was effected:

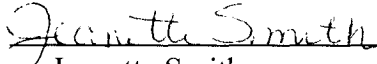
XXX U.S. Postal Service (by placing for collection and deposit in the United States mail a copy of said document at 854 Manzanita Court, Suite 110, Chico, California 95926, in a sealed envelope, with postage full prepaid).

_____ Federal Express

_____ Personal Service

_____ FAX

I declare under penalty of perjury that the foregoing is true and correct under the laws of the State of California and that this declaration was executed on September 14, 2011, at Chico, California.


Jeanette Smith