

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS**

KYLE ALEXANDER, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 14-CV-2159-KHV-JPO
)	
BF LABS INC.,)	
)	
Defendant.)	

DEFENDANT’S INITIAL DISCLOSURES

Defendant BF Labs Inc. makes the following initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure. These disclosures are based on information reasonably available and may be supplemented from time to time as additional relevant information or witnesses come to the attention of BF Labs, or to respond to contentions, information, or witnesses disclosed or identified by Plaintiff.

I. Individuals Likely to Have Discoverable Information¹

The name and last known address and telephone number of each individual likely to have discoverable information that Defendant may use to support its claims or defenses (unless solely for impeachment) are set forth below.

¹ BF Labs reserves the right to object to discovery requests relating to the witnesses below to the extent any such request seeks information protected by any right or privilege, that is irrelevant, or that causes “annoyance, embarrassment, oppression, or undue burden or expense” Fed. R. Civ. P. 26(c)(1).



1. Mr. Sonny Vleisides
c/o Polsinelli PC
900 W. 48th Place, Suite 900
Kansas City, Missouri 64112-1895

Mr. Vleisides is Vice President of Development and Innovation Officer at BF Labs, as well as one of the founders of the company. He may have knowledge or information relating to the history of BF Labs, operations, manufacturing, customer orders, customer relations, and the Bitcoin and Bitcoin mining industries.

2. Mr. Jeff Ownby
c/o Polsinelli PC
900 W. 48th Place, Suite 900
Kansas City, Missouri 64112-1895

Mr. Ownby is Vice President of Marketing and E-Commerce at BF Labs, as well as one of the founders of the company. He may have knowledge or information relating to the history of BF Labs, operations, manufacturing, customer relations, the Bitcoin and Bitcoin mining industries, and marketing and corporate communications.

3. Mr. Josh Zerlan
c/o Polsinelli PC
900 W. 48th Place, Suite 900
Kansas City, Missouri 64112-1895

Mr. Zerlan is the Chief Operating Officer and Vice President of Product Development at BF Labs. He may have knowledge regarding product evolution and development, operations, and the manufacturing and sales process.

4. Mr. David McClain
c/o Polsinelli PC
900 W. 48th Place, Suite 900
Kansas City, Missouri 64112-1895

Mr. McClain is an account manager at BF Labs. He may have information about customer relations and customer orders, as well as technical advice or guidance provided to customers.

5. Mr. Bruce Bourne
c/o Polsinelli PC
900 W. 48th Place, Suite 900
Kansas City, Missouri 64112-1895

Mr. Bourne is the acting Chief Financial Officer of BF Labs. He may have information regarding BF Labs' structure, finances, operations, policies, procedures, and customers.

6. Ms. Jody Drake
c/o Polsinelli PC
900 W. 48th Place, Suite 900
Kansas City, Missouri 64112-1895

Ms. Drake is the General Manager at BF Labs. She may have information regarding customer service, shipping, human resources and general office purchasing.

7. Mr. Marc Goodpasture
c/o Polsinelli PC
900 W. 48th Place, Suite 900
Kansas City, Missouri 64112-1895

Mr. Goodpasture is Production Manager at BF Labs. He may have information regarding operations, product assembly, and scheduling of supplier deliveries to support production efforts.

8. Mr. John Mutrux
c/o Polsinelli PC
900 W. 48th Place, Suite 900
Kansas City, Missouri 64112-1895

Mr. Mutrux is the Shipping Manager at BF Labs. He may have information regarding operations, customer orders, customer relations, and the shipping of BF Labs products to customers.

9. Mr. Paul Scholes
c/o Polsinelli PC
900 W. 48th Place, Suite 900
Kansas City, Missouri 64112-1895

Mr. Scholes is involved in customer service and product support efforts at BF Labs. He may have information regarding operations, customer orders, customer relations, and customer equipment returned for repair or replacement.

10. Mr. Nasser Ghoseiri
c/o Polsinelli PC
900 W. 48th Place, Suite 900
Kansas City, Missouri 64112-1895

Mr. Ghoseiri is the current Chief Technology Officer and Innovation Officer at BF Labs, as well as one of the founders of the company. He may have information regarding operations and the engineering of BF Labs products and product development, as well as the Bitcoin and Bitcoin mining industries.

11. Mr. A.J. Patel
Contractor

This witness may have knowledge or information relating to the manufacturing of printed circuit boards.

12. Mr. Bob Patel
General Manager/Owner of PCB Overnight

This witness may have knowledge or information relating to the manufacturing of printed circuit boards.

13. Representatives of BitPay
3423 Piedmont Road, NE
Atlanta, GA 30305

This witness may have knowledge or information relating to the conversion of Bitcoins to USD and payment processing services.

14. Ms. Linda Freeman
MarksNelson
1310 E. 104th Street, Suite 300
Kansas City, MO 64131
Phone: 813-743-7701

This witness may have knowledge relating to start-up companies, accounting, reporting, and tax and financial issues.

15. Mr. John Cheng
Chronicle Technologies Inc.
231 E. Alessandro Blvd., #A-490
Riverside, CA 92508
Tel.: 1-866-486-1817

This witness may have knowledge about Nanium S.A. and Interconnect Systems, Inc. as well as the development and production of BF Labs' products and operations.

16. Representatives of Interconnect Systems, Inc.
759 Flynn Road
Camarillo, CA 93012

This witness may have knowledge relating to the packaging of product.

17. Representatives of Nanium S.A.
Avenida 1 de Maio 801 4485-629
Vila do Conde, Portugal
Tel.: +351 252 246 000

This witness may have knowledge relating to the packaging of product.

18. Satisfied customers of BF Labs

II. Description of Documents by Category

The documents, electronically stored information, and other tangible things that BF Labs may use to support its claims or defenses (unless solely for impeachment) include non-privileged documents in the following categories:

1. Documents related to BF Labs terms and conditions for customer orders.
2. Documents relating to customer payments for our products and services.
3. Documents related to shipment in connection with our products and services.
4. Documents related to our website, forums, or postings.
5. Banking and other financial records related to the handling of customer payments.
6. Policies and procedures related to customer orders, shipping, and refunds.
7. Documents related to refunds made to customers.
8. Documents related to initial designs of BF Labs products.
9. Documents related to expected performance of BF Labs products.
10. Documents related to results of prototype testing of BF Labs products.
11. Documents relating to efforts to rectify issues identified with processing speed, power consumption or heat.
12. Inventory and supply records for products, services, parts, and materials.
13. Purchase and order records related to component or parts manufacturers and suppliers.
14. Documents and any other information relating to conversations or interactions with component or parts manufacturers and suppliers.
15. Documents relating to the substitution of products in connection with orders.

16. Documents related to the testing of equipment returned for repair or replacement (RMAs).
17. Documents related to replacement units sent to customers.
18. Documents relating to the manufacturing process and QA (Burn-in) testing of our products.
19. Documents relating to the creation or generation of virtual currency, including the mining of Bitcoin.
20. Documents relating to pricing for virtual currency products and services.
21. Documents relating to marketing and advertising.
22. Any and all representations made to customers or potential customers.
23. Documents related to the incorporation and organization of BF Labs Inc., including employee information, organizational information, and business filings.
24. Financial information, including projections and forecasts.
25. Documents related to third parties with whom we do business regarding virtual currency, including but not limited to component and part manufacturers and suppliers.
26. Documents relating to purchases of our products and services.
27. Email communication with any Plaintiff to this litigation.
28. Any documents disclosed by any other party to this litigation.

III. Computation of Damages

Not applicable.

IV. Insurance Agreements

Insurance agreement information will be made available to Plaintiffs.

Dated: June 18, 2014

Respectfully submitted,

/s/ James M. Humphrey

James M. Humphrey

KS #70664

Michael S. Foster

KS #24011

Polsinelli PC

900 W. 48th Place, Suite 900

Kansas City, Missouri 64112-1895

Telephone: (816) 753-1000

Facsimile: (816) 753-1536

jhumphrey@polsinelli.com

mfoster@polsinelli.com

Attorneys for Defendant BF Labs Inc.