

UNITED STATES DISTRICT COURT  
FOR THE  
WESTERN DISTRICT OF MICHIGAN

MALIBU MEDIA, LLC	)	
	)	
Plaintiff,	)	Civil Action No. 1:13-cv-00162-RJJ
	)	
v.	)	
	)	
DON BUI a/k/a HUY H. BUI	)	
	)	
Defendant.	)	
_____	)	

**DEFENDANT’S RESPONSE TO PLAINTIFF’S  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Defendant Don Bui concedes for purposes of this litigation that each of the 57 Malibu Media movies identified by Plaintiff in the Complaint was ordered by him from KickAss Torrent, and was downloaded to his computer. It is Mr. Bui’s position that the copying and downloading were done by KickAss Torrent, and not by him.

In view of the foregoing, Defendant objects to the production of the documents requested as being unnecessary, irrelevant, immaterial and not reasonably calculated to lead to the discovery of evidence necessary or admissible at trial.

Respectfully submitted,

MITCHELL INTELLECTUAL PROPERTY LAW, PLLC

By:           /s/ James A. Mitchell            
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Attorney for Defendant

**CERTIFICATE OF SERVICE**

I hereby certify that on October 23, 2013, I emailed the foregoing document to Paul J. Nicoletti, Esq., Nicoletti & Associates, PLLC, paul@nicoletti-associates.com.

By:           /s/ James A. Mitchell            
James A. Mitchell