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10 Attorneys for Plaintiff,
11 Liberty Media Holdings, LLC

12 **IN THE UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 Liberty Media Holdings, LLC, a California Corporation)
15 Plaintiff,)
16 vs.)
17 FF Magnat Limited d/b/a Oron.com; Maxim)
18 Bochenko a/k/a Roman Romanov; and John)
19 Does 1-500,)
20 Defendants.)

Case No.: 2:12-cv-01507
**SUPPLEMENT TO EMERGENCY
MOTION FOR *EX PARTE* TEMPORARY
RESTRAINING ORDER**

21 Plaintiff Liberty Media Holdings, LLC (“Liberty”) hereby files this supplement to its
22 Emergency Motion for *Ex Parte* Motion for Temporary Restraining Order, filed with this Court on
23 June 20, 2012. Through that Motion, Plaintiff Liberty seeks an Order prohibiting Defendants from
24 transferring assets, including domain names and monetary holdings, outside of the United States
25 and, thus, outside of the jurisdictional reach of this Court. Plaintiff Liberty additionally requests
26 that this Court order that Defendants are not permitted to dispose of or delete any and all
27 information that might be probative in this matter, including but not limited to any information
28 contained in the account(s) Defendants maintain with Network Solutions, Inc., Yahoo!, Inc.,

1 Google, Inc., PayPal, Inc., CCBill, LLC, AlertPay, and any and all other accounts in which
2 Defendants maintain any business records. Plaintiff Liberty further requests that this Court order
3 Defendants to restore any business records that they have deleted since the time that negotiations
4 between Plaintiff and Defendants commenced on May 30, 2012.

5 Moreover, since this lawsuit was filed, Defendants have unlawfully conditioned their
6 compliance with the Digital Millennium Copyright Act (the “DMCA”), which would require them
7 to remove Liberty’s copyrighted material from Oron.com’s servers, upon Plaintiff Liberty agreeing
8 to Oron.com’s Terms of Service. Agreeing with those Terms of Service would require Liberty to
9 (a) consent to jurisdiction and venue in Hong Kong for all disputes with Defendants (¶ 14.5); (b)
10 agree to cap Defendants’ liability to Plaintiff Liberty at \$2,500 (¶ 9(e); and (c) require Liberty to
11 pay Defendants’ legal fees in any dispute between Plaintiff and Defendants, including the present
12 dispute (¶ 10). (See Oron.com Terms of Service, attached hereto as Exhibit 1.) Defendants’ new
13 demands for complying with U.S. copyright law further substantiates Plaintiff’s belief that
14 Defendants do not plan to litigate the instant matter in good faith, and will engage in further
15 conduct to frustrate Liberty’s rights to protect its content and redress ongoing infringement.

16 Based upon Defendants’ demonstrated attempt to move their assets outside of the
17 jurisdiction of this Court and the onerous conditions they have placed upon their compliance with
18 the DMCA, Plaintiff has legitimate concerns that Defendants may additionally attempt to dispose
19 of business records, financial records, and other evidence that might be relevant to the instant
20 lawsuit. (See Declaration of Marc J. Randazza in Support of Plaintiff’s Emergency Motion for *Ex*
21 *Parte* Temporary Restraining Order, Docket # 2-1, at ¶¶3-5.) Forbidding Defendants from
22 disposing of evidence will present no hardship upon Defendants. In fact, once Defendants became
23 aware of Plaintiff’s claims against them, a duty to preserve evidence attached to their business
24 activities. Moreover, preservation of all evidence is necessary for this Court to provide a full and
25 fair adjudication on the merits.

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1 Dated: June 21, 2012

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Respectfully Submitted,

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s/Ronald D. Green

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CERTIFICATE OF SERVICE

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I hereby certify that the foregoing document was filed using this Court's CM/ECF system on June 21, 2012.

Dated: June 21, 2012

Respectfully Submitted,

s/Ronald D. Green

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