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

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

Case No.: 2:12-cv-01057

**DECLARATION OF JASON TUCKER IN  
OPPOSITION TO DEFENDANTS'  
EMERGENCY MOTION FOR  
DISBURSEMENT OF FUNDS**

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**DECLARATION OF JASON TUCKER IN OPPOSITION TO DEFENDANTS'  
EMERGENCY MOTION FOR DISBURSEMENT OF FUNDS**

I, Jason Tucker, being over 18 years of age, having personal knowledge of the matters set forth herein, and being competent to testify about them if called to do so at trial, state as follows:

1. I am a director of Battleship Stance LLC, a leading anti-piracy enforcement company.
2. I am also a consultant and Enforcement Officer for major, award-winning adult entertainment studios including the publicly traded Private Media Group's Fraserside IP LLC

1 division, Zero Tolerance Entertainment, Third Degree Films, and Cybernet Entertainment, d/b/a  
2 Kink.com, to name a few.

3 3. I have been involved in the business of legal adult erotic entertainment production,  
4 marketing and management at an executive level for over ten (10) years, serving for over six (6)  
5 years as President of a company that owns and licenses one of the world's largest libraries of erotic  
6 images.

7 4. As an experienced executive within the adult entertainment industry, I have been  
8 quoted or featured in publications including Newsweek, BusinessWeek, USA Today, Wired and  
9 the Washington Post and frequently am requested to speak on panels and seminars at industry  
10 events on various industry related topics.

11 5. I have purchased, managed and sold top-level adult domain names such as  
12 Erotica.com, SexSlaves.com and Wetdreams.com.

13 6. I have also been involved in more than fifty (50) federal lawsuits brought against a  
14 range of defendants for copyright infringement, and have previously served as an expert witness in  
15 similar proceedings.

16 7. I have made myself familiar with the corporate structure of Plaintiff and its parent  
17 company, sibling companies, and related entities.

18 8. I have made myself familiar with the company methods, procedures, production and  
19 ownership of copyrighted materials.

20 9. I have reviewed the evidence of infringements committed by Defendants, which are  
21 outlined in the Complaint.

22 10. I am personally aware of the methods utilized by Plaintiff and can attest to the facts  
23 and that Plaintiff works require and/or have required great sums of money to create detailed story  
24 lines; film in locations; construct detailed and intricate sets; employ talented writers, directors,  
25 actors, and editors; use the highest quality production equipment; and exceed the production value  
26 of typical adult erotic entertainment.

27 11. Based upon my experience and judgment, I am certain that Defendant and  
28 Defendant websites earned both significant memberships and other revenue by granting free access

1 to, and providing premium accounts for the expedited download of, Plaintiff's copyrighted works  
2 as identified in Exhibit 10 to the Complaint, and other unauthorized copyrighted works without  
3 compensation to the rightful copyright owners.

4 12. Based upon my experience and judgment, I believe that Leaseweb Hosting is a  
5 major hosting facility for sites that regularly commit massive copyright infringement. It is my  
6 professional opinion that Leaseweb has been made aware of the large amount of the infringing  
7 activity existing on their network.

8 13. In my experience in the online adult entertainment business, I have not encountered  
9 a hosting company that would not extend credit to cover hosting expenses upon request for a  
10 limited time, and especially under circumstances such as litigation.

11 14. Any party who has a relationship, such as the one Oron maintains with Leaseweb,  
12 not unlike the relationships I have with my hosting company, would be more than understanding in  
13 waiting a few weeks or months for funds if needed. Anything to the contrary seems questionable.

14 15. Based upon my experience and judgment in being involved in more than fifty (50)  
15 copyright infringement lawsuits and serving as an expert witness in the area of copyright  
16 enforcement and infringement, I am certain that Defendant's website contained large amounts of  
17 unauthorized, copyrighted materials.

18  
19 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
20 knowledge.

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22 Dated: June 29, 2012

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Jason Tucker