

ATTACHMENT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

In re Subpoena issued to Grande
Communications Networks LLC

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MISCELLANEOUS CASE NO: _____

DECLARATION OF JEANNE MULCAHY

I, Jeanne Mulcahy, hereby declare as follows:

1. My name is Jeanne Mulcahy. I am over 18 years of age, of sound mind, and fully competent to make this Declaration. I have personal knowledge of the matters stated herein, and they are true and correct. I am a Director of Legal Compliance Services for Neustar, Inc. ("Neustar"), which provides subpoena response and compliance services to Grande Communications Networks LLC ("Grande") as well as a number of other Internet service providers and cable providers. Grande is an Internet service provider and cable operator serving subscribers in several regions of the state of Texas.

2. On or about August 12, 2014, Neustar received a subpoena from Rightscorp, Inc. via Federal Express seeking the personal information of Grande subscribers for numerous IP address and timestamp combinations. The Subpoena was accompanied by a spreadsheet (approximately 500 pages long) listing 30,060 IP address and timestamp combinations as to which Rightscorp seeks such information. A copy of the Subpoena, as well as the first 10 pages and the last 10 pages of that spreadsheet is attached as Exhibit A, along with the first 10 pages

and the last 10 pages of a second, related spreadsheet (which is also approximately 500 pages long) titled "Infringement List" that lists numerous works to which Rightscorp (or some other person or entity) holds the copyright.

3. I am familiar with the process of responding to IP address lookups for Internet subscriber information. The process includes: (i) searching the Internet service providers' logs for the subscriber account to which a given IP address was assigned as of a particular date and time; (ii) determining the subscriber and the subscriber's billing or other contact address associated with that account; (iii) preparing, formatting, addressing, printing, and mailing notice of the subpoena to each subscriber (as customary and, with respect to a cable operator such as Grande, required), giving such subscriber a period of time to file an objection before the Internet service provider will disclose the subscriber's personal information; (iv) responding to subscriber inquiries and monitoring which subscribers have filed objections; and (v) preparing a response listing the personal information for the subscriber if no objection is filed, and transmitting that response to the requesting party in a secure manner.

4. The personal information that may be retrieved by an Internet service provider in the IP address lookup process described above is the name and contact information associated with the Internet subscriber (the person who pays the bill) for a given Internet account, which is not necessarily the name and contact information of the individual(s) (family member, roommate, guest, etc.) who were actually using that Internet account at the specified point in time.

5. Given the extraordinary volume of the subscriber lookups involved, the electronic information sought by the Subpoena is not reasonably accessible, and providing such information would impose extraordinary burden and cost on Grande.

6. Based on my experience and familiarity with the IP address logs and systems that Grande maintains for its Internet subscribers, I calculated a minimum cost and time period that would be associated with performing the over 30,000 lookups requested in the Subpoena. At a minimum, the cost of the lookups would be \$32,026.00, and it would take approximately two months for dedicated personnel to perform those lookups and send notifications to affected subscribers.

7. After Neustar's receipt of the Subpoena, Neustar made several attempts to contact counsel for Rightscorp, Mr. Dennis J. Hawk, by phone and in writing, regarding the Subpoena, including concerns regarding the cost and time for compliance, as well as the absence of a court order. A true and correct copy of written communications including an e-mail chain is attached hereto as Exhibit B. After repeated efforts, Mr. Hawk finally responded (three days before the stated date for compliance) with a summary pronouncement that: "Our client does not pay to obtain the address details on infringers. We expect compliance by the service providers."

8. I declare under penalty of perjury that the above is true and correct.

DATED: September 5, 2014

FURTHER DECLARANT SAYETH NOT.

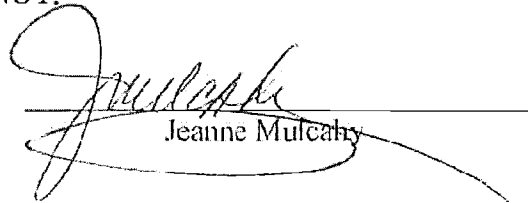

Jeanne Mulcahy

EXHIBIT A
to the Declaration of Jeanne Mulcahy



August 6, 2014

Grande Communications Networks, LLC
c/o Corporation Service Company (its registered agent)
2711 Centerville Rd, Suite 400, New Castle, DE 19808
c/o Neustar Legal Compliance 21575 Ridgeway Circle, Sterling VA 20166

Re: Grande Communications Networks, LLC, Copyright Infringements,
CVV# 2: 14 MC -00627

In connection with the referenced matter, please find attached:

1. Recorded Subpoena To Produce Documents, Information Or Objects Or To Permit Inspection Of Premises In A Civil Action with Exhibit A
2. Recorded Declaration Pursuant To 17 U.S.C. §512(H)
3. Recorded Notice Of Lodging Of Summary Spreadsheet And DMCA Notifications
4. Proof of Service-Acknowledgement of Service with attachment- please sign both documents and email to legaldepartment@rightscorp.com

Should you have any questions, you may contact me directly at 310.499.2792 or by email at legaldepartment@rightscorp.com

Kind regards,

A handwritten signature in cursive script, appearing to read 'Holly Schilz', is written over a printed name and title.

Holly Schilz
ISP Legal Compliance

AO 88B (Rev 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the

Central District of California

In Re Subpoena to Grande Communications Networks, LLC

Plaintiff

v.

Defendant

2:14mc-00627

Civil Action No.

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Grande Communications Networks, LLC, c/o Coporation Service Company (its registered agent) 2711 Centerville Rd, Suite 400, New Castle, DE 19808 c/o Neustar Legal Compliance 21575 Ridgetop Circle, Sterling VA 20166

(Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Information, including name, address, telephone number, and email address sufficient to identify the alleged infringers of copyrighted sound recordings, identified by IP addresses in the notices attached as Exhibit A to this Subpoena.

Place: Inquest Resources 807 Brazos Street, Suite 805 Austin, TX 78701

Date and Time: 09/05/2014 3:00 pm

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached - Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: AUG - 6 2014

Signature of Clerk or Deputy Clerk (with seal)

OR

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Rightscorp, Inc., who issues or requests this subpoena, are:

Dennis J. Hawk, Business Law Group, 3100 Donald Douglas Loop N., Santa Monica, CA 90405 Email: dennis@dhwk.com Phone: 310.664.8000

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Dennis J. Hawk (SBN 130731)
Business Law Group
3100 Donald Douglas Loop N.
Santa Monica, CA 90405
Tel: (310) 664-8000
Email: dennis@dhwk.com

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

2014 AUG -6 AM 11:57

In re Subpoena to
Grande Communications Networks, LLC

) 2:14mc-00627
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DECLARATION PURSUANT TO 17 U.S.C. § 512(h)

I, Dennis J. Hawk, the undersigned, declare that:

1. I am an attorney licensed to practice law in the State of California and am associated with Business Law Group ("Business Law Group"), counsel for Rightscorp, Inc. ("Rightscorp"), a representative of various copyright owners. Business Law Group is authorized to act on behalf of Rightscorp and the copyright owners it represents on matters involving the infringement of their copyrighted sound recordings. This declaration is made in support of the accompanying Subpoena, pursuant to 17 U.S.C. § 512(h)(2)(C).

2. The purpose of the accompanying Subpoena is to obtain the identity of the alleged copyright infringers who are identified at the Internet Protocol addresses in the notices contained in Exhibit A to the subpoena. The information obtained will be used only for the purpose of protecting the rights granted to our client and the copyright owners our client represents under Title 17 of the United States Code.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 6, 2014.


Dennis J. Hawk

Dennis J. Hawk (SBN 130731)
Business Law Group
3100 Donald Douglas Loop N.
Santa Monica, CA 90405
Tel: (310) 664-8000
Email: dennis@dhwk.com

2014 AUG -6 AM 11:58

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

2:14 MC-00627

In re Subpoena to
Grande Communications Networks, LLC

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Notice of Lodging of Summary Spreadsheet and
DMCA Notifications

Documents attached to the cd include:

1. Excel Summary Spreadsheet
2. Notices from May 28, 2014 to July 25, 2014

Executed on August 6, 2014



Dennis J. Hawk

NAME, ADDRESS AND TELEPHONE NUMBER OF ATTORNEY(S)

Dennis J. Hawk (SBN 130731)
Business Law Group 3100 Donald Douglas Loop N.
Santa Monica, CA 90405
Email: dennis@dhwk.com

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

In re Subpoena to Grande Communications
Networks, LLC

PLAINTIFF(S),

v.

DEFENDANT(S).

CASE NUMBER

2: 14 MC -00627

PROOF OF SERVICE - ACKNOWLEDGMENT
OF SERVICE

I, the undersigned, certify and declare that I am over the age of 18 years, employed in the County of
Los Angeles, State of California, and not a
party to the above-entitled cause. On August 6, 2014, I served a true copy of
(see attached transmittal letter dated August 6, 2014)

by personally delivering it to the person (s) indicated below in the manner as provided in FRCivP 5(b); by
depositing it in the United States Mail in a sealed envelope with the postage thereon fully prepaid to the following:
(list names and addresses for person(s) served. Attach additional pages if necessary. *See attached*)

Place of Mailing: 3100 Donald Douglas Loop N. Santa Monica, CA 90405

Executed on August 6, 2014 at Santa Monica, CA, California

Please check one of these boxes if service is made by mail:

- I hereby certify that I am a member of the Bar of the United States District Court, Central District of California.
- I hereby certify that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.
- I hereby certify under the penalty of perjury that the foregoing is true and correct.

Signature of Person Making Service

ACKNOWLEDGEMENT OF SERVICE

I, _____, received a true copy of the within document on _____.

Signature

Party Served



August 6, 2014

Grande Communications Networks, LLC
c/o Corporation Service Company (its registered agent)
2711 Centerville Rd, Suite 400, New Castle, DE 19808
c/o Neustar Legal Compliance 21575 Ridgetop Circle, Sterling VA 20166

Re: Grande Communications Networks, LLC, Copyright Infringements,
2: 14 MC -00627

As per Brenda Materne, of Grande Communication Networks, 401 Carlson Circle, San Marcos, Texas, please sign below the acknowledgement of your agreement to accept service by Federal Express of subpoena and related documents in compliance with FRCivP5(b)(F) on behalf of Grande Communications Networks, LLC.

Should you have any questions, you may contact me directly at 310.499.2792.

Kind regards,


Holly Schilz
ISP Legal Compliance

Grande Communications Networks, LLC

EXHIBIT A
to the Declaration of Jeanne Mulcahy
(excerpts from spreadsheet of IP addresses and timestamps)

TargetNum	TargetType	Name	Addr	City	State	Zip	ReqStart	ReqEnd	TargetInfo	MiscField	ActivatedDate	Min	ReleaseTypes
216.188.226.132	Individual/Residential Account						07/09/2014 09:24:42 AM	07/09/2014 09:24:42 AM	IP				SUB
216.188.226.12	Individual/Residential Account						05/28/2014 12:34:07 AM	05/28/2014 12:34:07 AM	IP				SUB
216.188.226.12	Individual/Residential Account						05/28/2014 01:51:33 AM	05/28/2014 01:51:33 AM	IP				SUB
216.188.226.12	Individual/Residential Account						05/28/2014 02:09:34 AM	05/28/2014 02:09:34 AM	IP				SUB
216.188.226.12	Individual/Residential Account						05/29/2014 01:08:44 AM	05/29/2014 01:08:44 AM	IP				SUB
216.188.226.12	Individual/Residential Account						05/29/2014 03:11:28 AM	05/29/2014 03:11:28 AM	IP				SUB
216.188.226.12	Individual/Residential Account						05/29/2014 11:43:52 AM	05/29/2014 11:43:52 AM	IP				SUB
216.188.226.12	Individual/Residential Account						05/30/2014 12:45:02 AM	05/30/2014 12:45:02 AM	IP				SUB
216.188.226.12	Individual/Residential Account						05/30/2014 01:05:57 AM	05/30/2014 01:05:57 AM	IP				SUB
216.188.226.12	Individual/Residential Account						05/30/2014 04:14:45 PM	05/30/2014 04:14:45 PM	IP				SUB
216.188.226.12	Individual/Residential Account						05/31/2014 02:42:54 AM	05/31/2014 02:42:54 AM	IP				SUB
216.188.226.12	Individual/Residential Account						05/31/2014 02:44:16 AM	05/31/2014 02:44:16 AM	IP				SUB
216.188.226.12	Individual/Residential Account						05/31/2014 03:23:34 AM	05/31/2014 03:23:34 AM	IP				SUB
216.188.226.12	Individual/Residential Account						06/01/2014 01:00:01 AM	06/01/2014 01:00:01 AM	IP				SUB
216.188.226.12	Individual/Residential Account						06/01/2014 01:27:40 AM	06/01/2014 01:27:40 AM	IP				SUB
216.188.226.12	Individual/Residential Account						06/01/2014 06:20:15 PM	06/01/2014 06:20:15 PM	IP				SUB
216.188.226.12	Individual/Residential Account						06/02/2014 03:05:42 PM	06/02/2014 03:05:42 PM	IP				SUB
216.188.226.12	Individual/Residential Account						06/02/2014 08:50:01 PM	06/02/2014 08:50:01 PM	IP				SUB
216.188.226.12	Individual/Residential Account						06/02/2014 10:04:48 PM	06/02/2014 10:04:48 PM	IP				SUB
216.188.226.12	Individual/Residential Account						06/03/2014 12:06:15 AM	06/03/2014 12:06:15 AM	IP				SUB
216.188.226.12	Individual/Residential Account						06/03/2014 12:09:56 AM	06/03/2014 12:09:56 AM	IP				SUB
216.188.226.12	Individual/Residential Account						06/03/2014 02:33:36 AM	06/03/2014 02:33:36 AM	IP				SUB
216.188.226.12	Individual/Residential Account						06/04/2014 10:59:52 AM	06/04/2014 10:59:52 AM	IP				SUB
216.188.226.12	Individual/Residential Account						06/04/2014 11:46:48 AM	06/04/2014 11:46:48 AM	IP				SUB
216.188.226.12	Individual/Residential Account						06/07/2014 12:24:14 AM	06/07/2014 12:24:14 AM	IP				SUB
216.188.226.12	Individual/Residential Account						06/08/2014 05:10:40 PM	06/08/2014 05:10:40 PM	IP				SUB
216.188.226.12	Individual/Residential Account						06/10/2014 01:49:09 AM	06/10/2014 01:49:09 AM	IP				SUB
216.188.226.12	Individual/Residential Account						06/10/2014 02:35:23 AM	06/10/2014 02:35:23 AM	IP				SUB
216.188.226.12	Individual/Residential Account						06/10/2014 03:54:36 AM	06/10/2014 03:54:36 AM	IP				SUB
216.188.226.12	Individual/Residential Account						06/11/2014 12:46:08 AM	06/11/2014 12:46:08 AM	IP				SUB
216.188.226.12	Individual/Residential Account						06/11/2014 01:55:42 AM	06/11/2014 01:55:42 AM	IP				SUB
216.188.226.12	Individual/Residential Account						06/11/2014 02:49:57 PM	06/11/2014 02:49:57 PM	IP				SUB
216.188.226.12	Individual/Residential Account						06/12/2014 02:45:13 AM	06/12/2014 02:45:13 AM	IP				SUB
216.188.226.12	Individual/Residential Account						06/12/2014 02:59:20 AM	06/12/2014 02:59:20 AM	IP				SUB
216.188.226.12	Individual/Residential Account						06/12/2014 03:30:08 AM	06/12/2014 03:30:08 AM	IP				SUB
216.188.226.12	Individual/Residential Account						06/13/2014 04:17:35 AM	06/13/2014 04:17:35 AM	IP				SUB
216.188.226.12	Individual/Residential Account						06/14/2014 08:01:05 PM	06/14/2014 08:01:05 PM	IP				SUB
216.188.226.12	Individual/Residential Account						06/14/2014 08:58:01 PM	06/14/2014 08:58:01 PM	IP				SUB
216.188.226.12	Individual/Residential Account						06/15/2014 03:22:21 PM	06/15/2014 03:22:21 PM	IP				SUB
216.188.226.12	Individual/Residential Account						06/15/2014 04:25:14 PM	06/15/2014 04:25:14 PM	IP				SUB
216.188.226.12	Individual/Residential Account						06/15/2014 05:36:12 PM	06/15/2014 05:36:12 PM	IP				SUB
216.188.226.12	Individual/Residential Account						06/17/2014 12:02:45 AM	06/17/2014 12:02:45 AM	IP				SUB
216.188.226.12	Individual/Residential Account						06/17/2014 04:26:28 PM	06/17/2014 04:26:28 PM	IP				SUB
216.188.226.12	Individual/Residential Account						06/17/2014 07:54:14 PM	06/17/2014 07:54:14 PM	IP				SUB
216.188.226.12	Individual/Residential Account						06/18/2014 01:07:21 AM	06/18/2014 01:07:21 AM	IP				SUB
216.188.226.12	Individual/Residential Account						06/18/2014 02:27:08 AM	06/18/2014 02:27:08 AM	IP				SUB
216.188.226.12	Individual/Residential Account						06/18/2014 05:05:22 AM	06/18/2014 05:05:22 AM	IP				SUB
216.188.226.12	Individual/Residential Account						06/19/2014 12:05:29 AM	06/19/2014 12:05:29 AM	IP				SUB
216.188.226.12	Individual/Residential Account						06/19/2014 12:13:39 AM	06/19/2014 12:13:39 AM	IP				SUB
216.188.226.12	Individual/Residential Account						06/19/2014 12:49:14 AM	06/19/2014 12:49:14 AM	IP				SUB
216.188.226.12	Individual/Residential Account						06/25/2014 08:12:54 PM	06/25/2014 08:12:54 PM	IP				SUB
216.188.226.12	Individual/Residential Account						06/25/2014 08:52:11 PM	06/25/2014 08:52:11 PM	IP				SUB

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07/19/2014 02:18:07 AM 07/19/2014 02:18:07 AM IP
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07/19/2014 05:25:07 AM 07/19/2014 05:25:07 AM IP
07/19/2014 05:27:12 AM 07/19/2014 05:27:12 AM IP
06/19/2014 10:06:22 PM 06/19/2014 10:06:22 PM IP
06/19/2014 10:06:22 PM 06/19/2014 10:06:22 PM IP
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EXHIBIT A
to the Declaration of Jeanne Mulcahy
(excerpts from spreadsheet titled "Infringement List")

Grande Communications
Infringement List
(Time:GMT)

Table with columns: Case#, The Track, The File Name, Date (GMT), IP, Port. Rows include tracks like 'Merry Me', 'Trumpets', 'Bawitaba', 'Roving Gangster', 'Sugar', 'I Got One For Ya', 'Rock N Roll', 'Updown', 'Show Me A Good Time', 'Find Your Love', 'Wu-Tang Forever', 'Real Her', 'CALL ME WHEN YOU GET THIS', 'PUT YOUR RECORDS ON', 'TROUBLE SLEEPING', 'Pena Peña', 'Djubi Djuba', 'Allegria', 'Un Amor', 'Suano', 'Zek's Journey', 'Live Like You Were Dying', 'The Cowboy In Me.mp3', 'GET ALLOTT', 'Got That Feeling (Laidback Luke Remix)', 'One Love (Avidi's remix)', 'Escape Me (Avidi's Dub Mix At Night)', 'Make My Heart (Avidi's Replacer Remix)', 'Above vs. Sex Is On Fire (Avidi Bootleg)', 'Sunshine', 'Wildfire', 'FROM METO YOU', 'FROM ME TO YOU.mp3', 'FROM ME TO YOU', 'FROM ME TO YOU.mp3', 'FROM METO YOU', 'FROM METO YOU', 'SHE LOVES YOU', 'SHE LOVES YOU', 'SHE LOVES YOU', 'SHE LOVES YOU', 'ISSAM HER STANDING THERE', 'ISSAM HER STANDING THERE', 'I WANNA BE YOUR MAN (AND BE A MISERY', 'THERE'S A PLACE', 'Runaway', 'Take My Place', 'As Long As I Got You', 'Life For Me', 'Na Na', 'Swingin Party', 'Let's Stay Together', 'I'm Still In Love With You', 'You Ought To Be With Me', 'Snow Out', 'Banda A Make Her Dance (feat. 2 Chainz & Lil Wayne).mp3', 'Lights (Single Version).mp3', 'Katy Perry - Dark Horse (feat. Juicy J).mp3', 'Jas on Denulo - Talk Dirty', 'PEBULLFEAT KESHA - Timber.mp3', 'John Legend - John Legend - All of Me.mp3', 'One Direction - Story of My Life.mp3', 'Rihanna - The Monster (Explicit).mp3', 'Miley Cyrus - Best Day of My Life', 'Wrecking Ball'

Grande Communications
Infringement Lit
(Time GMT)

Table with 5 columns: #, Case#, The Track, The File Name, Date (GMT), IP, Port. It lists numerous music tracks and their associated metadata, including track titles like 'Turn Down For What' and 'Dj Snake & Lil Jon - Turn Down For What.mp3'.

Grande Communications
Infringement List
(TimeGMT)

Table with columns: #, Case#, The Track, File Name, Date (GMT), IP, Port. Contains a list of 398 entries with track names like 'Another Song', 'Cry Me A River', 'Chop Me Up', etc., and corresponding IP addresses and ports.

Grande Communications
Infringement List
(Time/GMT)

Table with columns: #, Case#, The Track, The File Name, Date (GMT), IP, Port. Contains a list of music tracks and their associated metadata.

Grande Communications
Infringement List
(Time:GMT)

Case#	The Track	The File Name	Port
4 27	TC-65108947-e33-e452-955-e101-e16-c8bb122	Rick Ross Discography (Tunes-Rip) [ht:LEAG] [Deezer Than Rap (Deluxe Version)] 31 [Macrifiant] (Feat. John Legend).mp3	47687
4 28	TC-775702339-737464-bc76-746c644732161	Rick Ross Discography (Tunes-Rip) [ht:LEAG] [Teflon Don] 02 Free Fcks on [Feat. Jay-Z].mp3	47687
4 29	TC-775702339-737464-bc76-746c644732161	Rick Ross Discography (Tunes-Rip) [ht:LEAG] [Teflon Don] 03 Teas. Or Joy (Feat. Cee-Lo).mp3	47687
4 30	TC-75387155-66f4-ace-b5-c6f08837c6d33	Wale Discography (Tunes-Rip) [ht:LEAG] [Miami Nights] 03 Miami Nights.mp3	47687
4 31	TC-9169411778-a394-b72c-44b5-41a32733	Wale Discography (Tunes-Rip) [ht:LEAG] [Miami Nights] 04 DC Or Nothing.mp3	47687
4 32	TC-6831891-b5-66f4-ace-b5-c6f08837c6d33	Wrecking Ball.mp3	47632
4 33	TC-7818d5-e6-b6f4-ace-b5-c6f08837c6d33	Wrecking Ball.mp3	47632
4 34	TC-646892c-504e-46b3-b37d-91188a9c21a8	Do My Thing	47632
4 35	TC-9169411778-a394-b72c-44b5-41a32733	Wrecking Ball.mp3	47632
4 36	TC-9169411778-a394-b72c-44b5-41a32733	Wrecking Ball.mp3	47632
4 37	TC-6334-2176-3a-4b-4d-2d-595f-9b9139131	Do My Thing.mp3	6881
4 38	TC-646892c-504e-46b3-b37d-91188a9c21a8	Do My Thing	6881
4 39	TC-6831891-b5-66f4-ace-b5-c6f08837c6d33	What You Are	6881
4 40	TC-9169411778-a394-b72c-44b5-41a32733	Dollar and a Dream III-RGF.mp3	6881
4 41	TC-9169411778-a394-b72c-44b5-41a32733	Who Dat	6881
4 42	TC-9169411778-a394-b72c-44b5-41a32733	Rider	6881
4 43	TC-1b1769-7d-d4d4-6f0c-3d23-9a-727d143639d	Ac Hood Feat Future & Rick Ross - Bugatti.mp3	6881
4 44	TC-1b1769-7d-d4d4-6f0c-3d23-9a-727d143639d	Ac Hood Feat Wiz Khalifa, T.I., Meek & Lil' French Montana, 2 Chainz, Future, DJ Khalid & Brdman - Bugatti.mp3	6881
4 45	TC-9169411778-a394-b72c-44b5-41a32733	Celebration	6881
4 46	TC-9169411778-a394-b72c-44b5-41a32733	I Know	6881
4 47	TC-7879334f5-6495-b5b5-b636-62e0891b7eaa	Sorry	6881
4 48	TC-1f1f1d8a-28b2-45ab-b61e-553a3d301294	F.U (Feat. Meek Mill).mp3	6881
4 49	TC-cd2a385f5-96c48b7-9393-cf1b1e3e2d62	Pride To The Side	6881
4 50	TC-341a16a9-7932-4c2c-3a1e-296c4c382a39	Cold Blood	6881
4 51	TC-9169411778-a394-b72c-44b5-41a32733	LeBron James	6881
4 52	TC-24511659-b451-4a8e-8bdf-08b12861399	King's Hit (Feat. T.I.).mp3	6881
4 53	TC-c8b181b1-b0c5-f046-8e4-32636a189c7	Respect That You Earn	6881
4 54	TC-6725289-7d8b-4c6b-3d2c-3d6c0a321e408e	ION Want It	6881
4 55	TC-9169411778-a394-b72c-44b5-41a32733	Act Right	6881
4 56	TC-9169411778-a394-b72c-44b5-41a32733	Money Trees	6881
4 57	TC-748d3155-b725-4f82-af-81873361e6ec	Good Kid	6881
4 58	TC-2e4c0c3b-b165-412a-8374-b5b33737a9e7	M.A.D. D. City	6881
4 59	TC-81b51438-bf6c-4324-b24e-394e489b083	Real	6881
4 60	TC-1b1769-7d-d4d4-6f0c-3d23-9a-727d143639d	Numb	6881
4 61	TC-2131c857-6654-47e-7519-4122013015931	Call On Me	6881
4 62	TC-9169411778-a394-b72c-44b5-41a32733	January	6881
4 63	TC-533846-e016-4455-8e9a-4954b-c14d669	Running (Disclosure Remix)	6881
4 64	TC-9169411778-a394-b72c-44b5-41a32733	Wildfire	6881
4 65	TC-c1c2b860-7276-46d3-b8b1-19926c7a76a2	Good Morning	6881
4 66	TC-7c16c23776-6f5-f668-75a-4708130185111	Everybody Knows	6881
4 67	TC-3471263c-95c4-f881-af5d-3c9a316d30e2	Cross The Line	6881
4 68	TC-3471263c-95c4-f881-af5d-3c9a316d30e2	This Time	6881
4 69	TC-9169411778-a394-b72c-44b5-41a32733	Satisfaction	6881
4 70	TC-9169411778-a394-b72c-44b5-41a32733	Good Morning	6881
4 71	TC-9169411778-a394-b72c-44b5-41a32733	Quickly	6881
4 72	TC-9169411778-a394-b72c-44b5-41a32733	No Other Love	6881
4 73	TC-9169411778-a394-b72c-44b5-41a32733	Green Light	6881
4 74	TC-9169411778-a394-b72c-44b5-41a32733	Love In The Future	6881
4 75	TC-9169411778-a394-b72c-44b5-41a32733	The Beginning	6881
4 76	TC-9169411778-a394-b72c-44b5-41a32733	Open Your Eyes	6881
4 77	TC-9169411778-a394-b72c-44b5-41a32733	Made To Love	6881
4 78	TC-9169411778-a394-b72c-44b5-41a32733	Who Do We Think We Are	6881
4 79	TC-9169411778-a394-b72c-44b5-41a32733	All Of Me	6881
4 80	TC-9169411778-a394-b72c-44b5-41a32733	Hold On Longer	6881
4 81	TC-9169411778-a394-b72c-44b5-41a32733	Save The Night	6881
4 82	TC-9169411778-a394-b72c-44b5-41a32733	Tomorrow	6881
4 83	TC-9169411778-a394-b72c-44b5-41a32733	What I Told You	6881
4 84	TC-9169411778-a394-b72c-44b5-41a32733	Dreams	6881
4 85	TC-9169411778-a394-b72c-44b5-41a32733	Wanna Be Loved	6881
4 86	TC-9169411778-a394-b72c-44b5-41a32733	Angel	6881
4 87	TC-9169411778-a394-b72c-44b5-41a32733	You & I (Noboby In The World)	6881
4 88	TC-9169411778-a394-b72c-44b5-41a32733	Asylum	6881
4 89	TC-9169411778-a394-b72c-44b5-41a32733	Catch Up	6881
4 90	TC-9169411778-a394-b72c-44b5-41a32733	Good Morning	6881
4 91	TC-9169411778-a394-b72c-44b5-41a32733	Hello	6881
4 92	TC-9169411778-a394-b72c-44b5-41a32733	This Is Love	6881
4 93	TC-9169411778-a394-b72c-44b5-41a32733	Freshy	6881
4 94	TC-9169411778-a394-b72c-44b5-41a32733	Great Times Are Coming	6881
4 95	TC-9169411778-a394-b72c-44b5-41a32733	The World Is Crazy	6881
4 96	TC-9169411778-a394-b72c-44b5-41a32733	Love Bullet	6881
4 97	TC-9169411778-a394-b72c-44b5-41a32733	Love Bullet	6881

Grande Communica hors
Infringement List
(Time:GMT)

Case#	The Track	The File Name	Date (GMT)	IP	Port
2395	TC-41451	fever	5/29/14 4:27 PM	67.186.89.19	59012
2396	TC-61451	Live Like You Were Dying	5/29/14 4:41 PM	67.186.89.19	59012
2397	TC-62451	The Cowboy In Me	5/29/14 4:41 PM	67.186.89.19	59012
2398	TC-63451	Changing	5/29/14 4:41 PM	67.186.89.19	34468
2399	TC-3451	Better Life	5/29/14 4:41 PM	67.186.89.19	34468
2400	TC-64451	Making Memories Of Us	5/29/14 4:41 PM	67.186.89.19	59012
2401	TC-65451	Tonight I Wanna Cry	5/29/14 4:41 PM	67.186.89.19	59012
2402	TC-66451	You're My Better Half	5/29/14 4:41 PM	67.186.89.19	59012
2403	TC-67451	Who Wouldn't Wanna Be Me	5/29/14 4:41 PM	67.186.89.19	59012
2404	TC-68451	Where The Backpack Ends	5/29/14 4:41 PM	67.186.89.19	59012
2405	TC-69451	Your Everything	5/29/14 4:41 PM	67.186.89.19	59012
2406	TC-70451	You Are The Best Thing	5/29/14 4:41 PM	67.186.89.19	59012
2407	TC-71451	Let It Be Me	5/29/14 4:41 PM	67.186.89.19	59012
2408	TC-72451	Sarah	5/29/14 4:41 PM	67.186.89.19	59012
2409	TC-73451	It's Like Care For You	5/29/14 4:41 PM	67.186.89.19	59012
2410	TC-74451	Winter Birds	5/29/14 4:41 PM	67.186.89.19	59012
2411	TC-75451	Mug White	5/29/14 4:41 PM	67.186.89.19	59012
2412	TC-76451	A Falling Through	5/29/14 4:41 PM	67.186.89.19	59012
2413	TC-77451	Gospel In The Grain	5/29/14 4:41 PM	67.186.89.19	59012
2414	TC-78451	BOW CHICKA WOV WOV	5/29/14 4:41 PM	67.186.89.19	59012
2415	TC-79451	Details In The Fabric	5/29/14 4:41 PM	67.186.89.19	59012
2416	TC-80451	I Don't Wanna Wait	5/29/14 4:41 PM	67.186.89.19	59012
2417	TC-81451	(I Got That) Boom Boom	5/29/14 4:41 PM	67.186.89.19	59012
2418	TC-82451	SHADOW	5/29/14 4:41 PM	67.186.89.19	59012
2419	TC-83451	O.m.g	5/29/14 4:41 PM	67.186.89.19	59012
2420	TC-84451	It's Over	5/29/14 4:41 PM	67.186.89.19	59012
2421	TC-85451	Rock You	5/29/14 4:41 PM	67.186.89.19	59012
2422	TC-86451	How Do You Sleep	5/29/14 4:41 PM	67.186.89.19	59012
2423	TC-87451	Into Ya	5/29/14 4:41 PM	67.186.89.19	59012
2424	TC-88451	Runnin	5/29/14 4:41 PM	67.186.89.19	59012
2425	TC-89451	Uptown	5/29/14 4:41 PM	67.186.89.19	59012
2426	TC-90451	So Long So Wrong	5/29/14 4:41 PM	67.186.89.19	59012
2427	TC-91451	A Living Prayer	5/29/14 4:41 PM	67.186.89.19	59012
2428	TC-92451	LOSE CONTROL	5/29/14 4:41 PM	67.186.89.19	59012
2429	TC-93451	We Run This	5/29/14 4:41 PM	67.186.89.19	59012
2430	TC-94451	Pass Da Bunt	5/29/14 4:41 PM	67.186.89.19	59012
2431	TC-95451	Work It	5/29/14 4:41 PM	67.186.89.19	59012
2432	TC-96451	MEMORIES	5/29/14 4:41 PM	67.186.89.19	59012
2433	TC-97451	Turn Up The Music	5/29/14 4:41 PM	67.186.89.19	59012
2434	TC-98451	Start	5/29/14 4:41 PM	67.186.89.19	59012
2435	TC-99451	Thinkin Bout You	5/29/14 4:41 PM	67.186.89.19	59012
2436	TC-100451	Sierra Leone	5/29/14 4:41 PM	67.186.89.19	59012
2437	TC-101451	Sweet Life	5/29/14 4:41 PM	67.186.89.19	59012
2438	TC-102451	Super Rich Kids	5/29/14 4:41 PM	67.186.89.19	59012
2439	TC-103451	Phi June	5/29/14 4:41 PM	67.186.89.19	59012
2440	TC-104451	Crack Rock	5/29/14 4:41 PM	67.186.89.19	59012
2441	TC-105451	Pyramids	5/29/14 4:41 PM	67.186.89.19	59012
2442	TC-106451	Lost	5/29/14 4:41 PM	67.186.89.19	59012
2443	TC-107451	White [ft. John Mayer]	5/29/14 4:41 PM	67.186.89.19	59012
2444	TC-108451	Monk	5/29/14 4:41 PM	67.186.89.19	59012
2445	TC-109451	Bad Religion	5/29/14 4:41 PM	67.186.89.19	59012
2446	TC-110451	Pink Water	5/29/14 4:41 PM	67.186.89.19	59012
2447	TC-111451	Forrest Gump	5/29/14 4:41 PM	67.186.89.19	59012
2448	TC-112451	End	5/29/14 4:41 PM	67.186.89.19	59012
2449	TC-113451	Wu Tang Forever	5/29/14 4:41 PM	67.186.89.19	59012
2450	TC-114451	Somebody's Gotta Die	5/29/14 4:41 PM	67.186.89.19	59012
2451	TC-115451	Another	5/29/14 4:41 PM	67.186.89.19	59012
2452	TC-116451	Wake Up	5/29/14 4:41 PM	67.186.89.19	59012
2453	TC-117451	Only You Know and I Know	5/29/14 4:41 PM	67.186.89.19	59012
2454	TC-118451	I Don't Wanna Know	5/29/14 4:41 PM	67.186.89.19	59012
2455	TC-119451	Don't Call Me	5/29/14 4:41 PM	67.186.89.19	59012
2456	TC-120451	End Of The Beginning	5/29/14 4:41 PM	67.186.89.19	59012
2457	TC-121451	God Is Dead?	5/29/14 4:41 PM	67.186.89.19	59012
2458	TC-122451	Lonier	5/29/14 4:41 PM	67.186.89.19	59012
2459	TC-123451	Zeitgeist	5/29/14 4:41 PM	67.186.89.19	59012
2460	TC-124451	Age Of Reason	5/29/14 4:41 PM	67.186.89.19	59012
2461	TC-125451	Live Forever	5/29/14 4:41 PM	67.186.89.19	59012
2462	TC-126451	Damaged Soul	5/29/14 4:41 PM	67.186.89.19	59012

Grand Communications
Infringement List
(Time GMT)

Table with columns: #, Case#, The Track, The File Name, Date (GMT), IP, Port. The table lists numerous copyright infringement cases, including tracks like 'A Matter of Time', 'Miss the Masery', and 'Should Have Known', along with their respective dates, IP addresses, and port numbers.

Grande Communions
Infringement Lit
[Time:GMT]

Table with columns: #, Case#, The Track, The File Name, Date (GMT), IP, Port. Contains a large list of file names, dates, and IP addresses.

Grand Communications
Infringement Lit
(Time GMT)

Case#	The Track	The File Name	Date (GMT)	IP	Port
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Just Lose It	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Encore	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	As I Like That	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Added To You	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Shame On Me	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Lord of the Rings: The Return of the King	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Medicated	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Wanna Get Married	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Just Want You	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Who Dat	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Twenty Seven	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Fantasy	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	BSK	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	This Knit Control	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Hurt Like	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	No Trace	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Ach Tree Lane	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Sally Sweet	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Dark Do Wop	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Think of You	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Head & Not My Home	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Bones	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Land of the Snakes	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Waterfall	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Fa Hion!	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Back Stinkhead	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	New Stives	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Guilt Trip	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Bound 2	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Heart of A Lion	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Up & Away	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Wedding Ball	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	I Should Live In Salt	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Demons	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Don't Swallow The Cap	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Prep Roof	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Sea of Love	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	HeavenDecd.mp3	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	This Is The Last Time	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Gracelles	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Slipped	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	I Need My Girl	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Humiliation	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Pink Rabbits	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Hard To Find	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Supernatural 9.18.hbhc6	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	New Genious	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Phener To Arizona	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Revolving Doors	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Hillbilly Man	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Derrot	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Step It	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Smokin Rollin	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	No Heart No Love	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	So Much Money	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	BounceIt	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Wax	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Gun Plux A Mask	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Smoke A Nigga	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Show Out	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	The Woods	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Money A Do It	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Talkin Bout	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	All I Blow Is Loud	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Bandz A Make Her Dance	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	School Hip	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Havin Some	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	One Of Those Nights	5/28/14 3:37 AM	72.48.989.359	28675
29751	TC-881167-633a-42d1-8888-3de4-b9c53e4	Land of the Snakes	5/28/14 3:37 AM	72.48.989.359	28675

Grande Communications
Infringement List
(Time GMT)

Table with columns: #, Case#, The Track, The File Name, Date (GMT), IP, Port. It lists numerous tracks and file names such as 'Land of the Snakes', 'Turn Up The Music', 'Dark Horse', 'Talk Dirty', etc., along with their corresponding timestamps and IP addresses.

Grande Communications
Infringement List
(Time GMT)

#	Case#	The Track	The Title Name	Date (GMT)	IP	Port
2582	TC-918667	Sunday	Sunday (feat. Frank Ocean).mp3	5/28/14 8:29 AM	66.90.381.26	13651
2583	TC-918667	Hotness	Hotness .mp3	5/28/14 8:29 AM	66.90.381.26	13651
2584	TC-918667	Catch Me At The Light	Catch Me At The Light (feat. Shan).mp3	5/28/14 9:20 AM	24.155.174.70	26108
2585	TC-918667	Nothing is Stopping You	Nothing is Stopping You.mp3	5/28/14 9:28 AM	66.90.381.26	13651
2586	TC-918667	Fire	Fire .mp3	5/28/14 9:28 AM	66.90.381.26	13651
2587	TC-918667	3 1 1 3	3 - 1 1 3 1 1 3 .mp3	5/28/14 9:28 AM	66.90.381.26	13651
2588	TC-918667	You Don't Know	You Don't Know .mp3	5/28/14 9:28 AM	66.90.381.26	13651
2589	TC-918667	Beware	Beware (feat. Lil Wayne & Jhene Aiko).mp3	5/28/14 9:28 AM	66.90.381.26	13651
2590	TC-918667	First Chain	First Chain (feat. Usher, Nicki Minaj & Lil Durr).mp3	5/28/14 9:28 AM	66.90.381.26	13651
2591	TC-918667	Monalisa	Monalisa .mp3	5/28/14 9:28 AM	66.90.381.26	13651
2592	TC-918667	MUF	MUF (feat. Nicksi Minaj & Juicy J).mp3	5/28/14 9:28 AM	66.90.381.26	13651
2593	TC-918667	Sierra Leone	Sierra Leone (feat. Drake).mp3	5/28/14 9:28 AM	66.90.381.26	13651
2594	TC-918667	World Abaze	World Abaze (feat. James Fauntleroy).mp3	5/28/14 9:28 AM	66.90.381.26	13651
2595	TC-918667	Ashley	Ashley (feat. Miguel).mp3	5/28/14 9:28 AM	66.90.381.26	13651
2596	TC-918667	All Figured Out	All Figured Out .mp3	5/28/14 9:28 AM	66.90.381.26	13651
2597	TC-918667	Long Live ASAP	Long Live ASAP .mp3	5/28/14 9:28 AM	66.90.381.26	13651
2598	TC-918667	ITrain	ITrain (feat. Drake).mp3	5/28/14 9:28 AM	66.90.381.26	13651
2599	TC-918667	Land of the Snakes	Land of the Snakes .mp3	5/28/14 9:41 AM	66.90.381.26	13651
2600	TC-918667	Money Tree	Money Tree (feat. Jay Rock).mp3	5/28/14 9:45 AM	24.155.174.70	6881
2601	TC-918667	Goud Kid	Goud Kid .mp3	5/28/14 9:45 AM	24.155.174.70	6881
2602	TC-918667	M.A.A.D. City	M.A.A.D. City (feat. MC Eht).mp3	5/28/14 9:46 AM	24.155.174.70	6881
2603	TC-918667	Real	Real (feat. Anna Wise of 50cent).mp3	5/28/14 9:46 AM	67.188.12.178	43355
2604	TC-918667	Prancer	Prancer .mp3	5/28/14 9:46 AM	67.188.12.178	43355
2605	TC-918667	When I Last My Bet	When I Last My Bet .mp3	5/28/14 9:46 AM	67.188.12.178	43355
2606	TC-918667	One Of Us Is The Killer	One Of Us Is The Killer .mp3	5/28/14 9:46 AM	67.188.12.178	43355
2607	TC-918667	Hero of the Soviet Union	Hero of the Soviet Union .mp3	5/28/14 9:46 AM	67.188.12.178	43355
2608	TC-918667	Nothing is Funny	Nothing is Funny .mp3	5/28/14 9:46 AM	67.188.12.178	43355
2609	TC-918667	Understanding Decay	Understanding Decay .mp3	5/28/14 9:46 AM	67.188.12.178	43355
2610	TC-918667	Paranoia Shields	Paranoia Shields .mp3	5/28/14 9:46 AM	67.188.12.178	43355
2611	TC-918667	Magic That Held You Prisoner	Magic That Held You Prisoner .mp3	5/28/14 9:46 AM	67.188.12.178	43355
2612	TC-918667	Cross Burner	Cross Burner .mp3	5/28/14 9:46 AM	67.188.12.178	43355
2613	TC-918667	The Threat Posed by Nuclear War	The Threat Posed by Nuclear War .mp3	5/28/14 9:46 AM	67.188.12.178	43355
2614	TC-918667	Real Her	Real Her (feat. Lil Wayne & André 3000).mp3	5/28/14 9:46 AM	66.90.381.26	13651
2615	TC-918667	Fa No! I	Fa No! I .mp3	5/28/14 9:46 AM	24.155.174.70	6881
2616	TC-918667	Someone Like You	Someone Like You .mp3	5/28/14 9:46 AM	24.155.174.70	6881
2617	TC-918667	Beware	Beware .mp3	5/28/14 9:46 AM	24.155.174.70	6881
2618	TC-918667	2 On	2 On (feat. Schoolboy Q).mp3	5/28/14 10:19 AM	66.90.381.26	13651
2619	TC-918667	Women in Uniform	Women in Uniform .mp3	5/28/14 11:24 AM	72.48.188.217	49944
2620	TC-918667	Bad	Bad (feat. Tera Thomas).mp3	5/28/14 11:24 AM	66.90.381.26	13651
2621	TC-918667	Decided out of Heaven	Decided out of Heaven .mp3	5/28/14 11:24 AM	66.90.381.26	13651
2622	TC-918667	Treasure	Treasure .mp3	5/28/14 11:24 AM	66.90.381.26	13651
2623	TC-918667	When I Was Your Man	When I Was Your Man .mp3	5/28/14 11:24 AM	66.90.381.26	13651
2624	TC-918667	Wrecking Ball	Wrecking Ball - Wiley Cyrus.mp3	5/28/14 11:24 AM	66.90.381.26	13651
2625	TC-918667	Cups (When I'm Gone)	Cups (When I'm Gone) - Anna Kendrick.mp3	5/28/14 11:24 AM	66.90.381.26	13651
2626	TC-918667	Holy Grail	Holy Grail - Justin Timberlake.mp3	5/28/14 11:24 AM	66.90.381.26	13651
2627	TC-918667	Don't You Worry Child	Don't You Worry Child - Swedish House Mafia ft. John Martin.mp3	5/28/14 11:24 AM	66.90.381.26	13651
2628	TC-918667	Best Song Ever	Best Song Ever - One Direction.mp3	5/28/14 11:24 AM	66.90.381.26	13651
2629	TC-918667	Sunday	Sunday (feat. Frank Ocean).mp3	5/28/14 11:24 AM	24.155.174.70	6881
2630	TC-918667	Hotness	Hotness .mp3	5/28/14 11:24 AM	66.90.381.26	13651
2631	TC-918667	Thinkin Bout You	Thinkin Bout You .mp3	5/28/14 11:24 AM	66.90.381.26	13651
2632	TC-918667	Sierra Leone	Sierra Leone .mp3	5/28/14 11:24 AM	66.90.381.26	13651
2633	TC-918667	Sweet Life	Sweet Life .mp3	5/28/14 11:24 AM	66.90.381.26	13651
2634	TC-918667	Super Rich Kids	Super Rich Kids (feat. Earl Sweatshirt).mp3	5/28/14 11:24 AM	66.90.381.26	13651
2635	TC-918667	Pistol Jones	Pistol Jones .mp3	5/28/14 11:24 AM	66.90.381.26	13651
2636	TC-918667	Crack Rock	Crack Rock .mp3	5/28/14 11:24 AM	66.90.381.26	13651
2637	TC-918667	Pyramids	Pyramids .mp3	5/28/14 11:24 AM	66.90.381.26	13651
2638	TC-918667	Lost	Lost .mp3	5/28/14 11:24 AM	66.90.381.26	13651
2639	TC-918667	Monks [ft. John Mayer]	Monks [ft. John Mayer].mp3	5/28/14 11:24 AM	66.90.381.26	13651
2640	TC-918667	Bad Religion	Bad Religion .mp3	5/28/14 11:24 AM	66.90.381.26	13651
2641	TC-918667	Pink Matter	Pink Matter (feat. André 3000).mp3	5/28/14 11:24 AM	66.90.381.26	13651
2642	TC-918667	Forest Gump	Forest Gump .mp3	5/28/14 11:24 AM	66.90.381.26	13651
2643	TC-918667	End	End .mp3	5/28/14 11:24 AM	66.90.381.26	13651
2644	TC-918667	Work Remix	Work Remix (feat. ASAP Rocky, French Montana, Trinidad James & Schoolboy Q).mp3	5/28/14 11:24 AM	66.90.381.26	13651
2645	TC-918667	Farrak West	Farrak West (feat. André 3000 - Parrak West).mp3	5/28/14 11:24 AM	66.90.381.26	13651
2646	TC-918667	From Dusk Till Dawn	From Dusk Till Dawn (feat. André 3000 - Parrak West).mp3	5/28/14 11:24 AM	66.90.381.26	13651
2647	TC-918667	Slut	Slut .mp3	5/28/14 12:39 PM	66.90.381.26	13651
2648	TC-918667	Fony Flight (ft) (feat. Frank Ocean)	Fony Flight (ft) (feat. Frank Ocean).mp3	5/28/14 12:39 PM	66.90.381.26	13651
2649	TC-918667	Party Starter/Campfire/Bimber	Party Starter/Campfire/Bimber .mp3	5/28/14 12:39 PM	66.90.381.26	13651

Grande Communications
Infringement List
(Time GMT)

#	Case#	The Track	The File Name	Date (GMT)	IP	Port
30134	TC-66b9c31-1979-4368-94e-24e5547f1dd	Gorgeous	03_Gorgeous [feat. Kid Cudi].mp3	5/28/14 9:06 PM	24.155.110.238	56596
30135	TC-4b8dd66-f9fa-4bcb-8b03-e76078516e1	Monster	07_Monster [feat. Jay-Z, Rick Ross, Nicki Minaj & Bon Iver].mp3	5/28/14 9:06 PM	24.155.110.238	56596
30136	TC-744d378e-905e-4abb-a336-49aa6f07838	So Appalled	08_So Appalled [feat. Jay-Z, Pusha T, Cyhi Da Prynce, Swizz Beatz & The RZA].mp3	5/28/14 9:06 PM	24.155.110.238	56596
30137	TC-560755-16ba-ea43-bf69d8f7816e678	Hell Of A Life	11_Hell Of A Life.mp3	5/28/14 9:06 PM	24.155.110.238	56596
30138	TC-ad86f551-546b-46bb-a3b6-d893162651164	Blame Game	12_Blame Game [feat. John Legend].mp3	5/28/14 9:06 PM	24.155.110.238	56596
30139	TC-791cb658-d324-c0f-9779-940383b3a263	Lost In The World	13_Lost In The World [feat. Bon Iver].mp3	5/28/14 9:11 PM	65.36.120.207	48245
30140	TC-be4c34b-b7d4-498b-b771-172bab1483d6	Gravity	Gravty.2313.1081p.30.HBS.BuRay.x264.V1P1.mp4	5/28/14 9:38 PM	24.155.61.239	31894
30141	TC-444a7cb-8ccc-4624-a9cb-41c761124890	Red Hot Kinda Love	03_Red Hot Kinda Love.mp3	5/28/14 10:25 PM	66.91.215.1	52778
30142	TC-7b668d81-4610-4212-b175-dc353a395977	Enter the Dragon	Enter.The.Dragon.1973.1.089.p.BluRay.x264.V1P1	5/28/14 10:38 PM	66.91.218.251	52465
30143	TC-9344f46-6a-fdd4-d857b995-726ade134d10	Little Wonder	08 - Little Wonder.mp3	5/28/14 10:58 PM	24.155.22.145	43009
30144	TC-491bb195-a169-41d7-ba39-c9965178194c	Start	01_Start.mp3	5/28/14 10:58 PM	24.155.22.145	43009
30145	TC-452a029-d784-4954-9a23-9a0bdf458087	Thinkin Bout You	02_Thinkin Bout You.mp3	5/28/14 10:58 PM	24.155.22.145	43009
30146	TC-69862682324-c03-b981-294-e25238932	Sierra Leone	04_Sierra Leone.mp3	5/28/14 10:58 PM	24.155.22.145	43009
30147	TC-69862682324-c03-b981-294-e25238932	Sweet Life	05_Sweet Life.mp3	5/28/14 10:58 PM	24.155.22.145	43009
30148	TC-9ac913cf-c969-437d-99c1-653f3d29411	Super Rich Kids	07_Super Rich Kids [feat. Earl Sweatshirt].mp3	5/28/14 10:58 PM	24.155.22.145	43009
30149	TC-931376d-897d-4a2f-2912d-dbae949337e	Pilot Jones	08_Pilot Jones.mp3	5/28/14 10:58 PM	24.155.22.145	43009
30150	TC-57425a-731df-4e0c-88165-f9fee0b4b2b2	Crack Rock	09_Crack Rock.mp3	5/28/14 10:58 PM	24.155.22.145	43009
30151	TC-565adcb-f08d-4411-7aaee-78a558316224	Pyramids	10_Pyramids.mp3	5/28/14 10:58 PM	24.155.22.145	43009
30152	TC-42ba2c3-21f5-433748-065-2945-e0f98f736	Lost	11_Lost.mp3	5/28/14 10:58 PM	24.155.22.145	43009
30153	TC-747911e-333ab-4b12-9312-d0bbd114d1cc	White [ft. John Mayer]	12_White [feat. John Mayer].mp3	5/28/14 10:58 PM	24.155.22.145	43009
30154	TC-6818994-579e-4e08-a77d-9f349f347f6e49	Monks	13_Monks.mp3	5/28/14 10:58 PM	24.155.22.145	43009
30155	TC-31818994-579e-4e08-a77d-9f349f347f6e49	Bad Religion	14_Bad Religion.mp3	5/28/14 10:58 PM	24.155.22.145	43009
30156	TC-1217875-3f33-43c2-9422-7a27562493b	Pink Matter	15_Pink Matter [feat. André 3000].mp3	5/28/14 10:58 PM	24.155.22.145	43009
30157	TC-8836676-47c1-453a-9549-040c02811b56	Forrest Gump	16_Forrest Gump.mp3	5/28/14 10:58 PM	24.155.22.145	43009
30158	TC-6f85f48b-366b-4885-a7db-465359163ab	You Don't Want These Problems	04 - You Don't Want These Problems [feat. Big Sean, Rick Ross, French Montana, 2 Chainz, Meek Mill, Ace Hood & Timbaland].mp3	5/28/14 10:58 PM	24.155.5.67	19873
30159	TC-4e51a7e-7d78-4e79-916-59bb-e323bae5271c	End	17_End.mp3	5/28/14 11:07 PM	24.155.5.67	19873
30160	TC-4201a6ab-55b4-4779-9f3c094-d5b574d31	President Carter	13-President_Carter-arillinet.mp3	5/28/14 11:16 PM	66.91.199.211	54820

EXHIBIT B
to the Declaration of Jeanne Mulcahy

EXHIBIT B
to the Declaration of Jeanne Mulcahy
(correspondence to Dennis J. Hawk regarding Subpoena)



08/19/2014

*Dennis J Hawk, Esq.
807 Brazos St, Ste 805
Austin, TX 78701*

Re: In RE: Subpoena to Grande Communications Networks, LLC, 2:14MC-00627
Control # TM9481

Dear Dennis J Hawk, Esq.

We are a designated agent of Grande Communications authorized to respond to subpoenas, search warrants, and court orders for the production of customer and call detail records. We have received a copy of a Civil Proceeding Subpoena Request, served upon Grande Communications requesting records for 24.155.61.233. This letter is to advise you that:

 X We have some questions about your legal process that may require that it be revised. -- see attached Validation Checklist Document.

Please contact Tamara Moorman at (877) 510-4357. When calling, please reference the control number # TM9481 to enable us to retrieve the subpoena and letter from our files for the contact.

Very truly yours,

A handwritten signature in black ink, appearing to read "Tamara Moorman".

Tamara Moorman
Authorized Agent for Custodian of Records
Grande Communications



Validation Checklist Document

Please contact us at your earliest convenience to further discuss these issues:

Legal Process was addressed to the incorrect corporate name. Legal Process must be addressed to.

Cable Act (Title 47 U.S.C. § 551) provisions apply:

Records specified cannot be provided with the type of legal process that you have used; judicially approved court order is required for the release of the sought data.

Please note that that the judicially approved court order must contain a DO NOT DISCLOSE clause. Otherwise Grande Communications is required to notify its subscriber(s) of your request.

Sample DO NOT DISCLOSE language: "It is requested that Grande Communications does not notify its subscriber(s) of this request as such notification might interfere with this proceeding.", "You are requested not to disclose the existence of this request. Any such disclosure could impede the investigation being conducted of thereby interfere with the enforcement of the law."

Should Grande Communications be required to notify its subscriber(s) of your request, the release of the sought records will be delayed. Please contact us to discuss the delay details.

We are unable to identify the records you are requesting due to the broad language that was used in describing the records sought. Sample language: Incoming Calls, Outgoing Call, Monthly Statements, Subscriber Info (name and address), etc.

Other - Due to the voluminous request, there is a cost for the record production which is \$32,026.

EXHIBIT B
to the Declaration of Jeanne Mulcahy
(e-mail exchange with Dennis J. Hawk regarding Subpoena)

From: Dennis Hawk [mailto:dennis@dhwk.com]
Sent: Tuesday, September 02, 2014 5:00 PM
To: Mulcahy, Jeanne
Cc: Dennis Hawk
Subject: RE: Grande Communications Case# TM9481 - Records Request

Thank you for your email. Our client does not pay to obtain the address details on infringers. We expect compliance by the service providers.

From: Jeanne.Mulcahy@neustar.biz [mailto:Jeanne.Mulcahy@neustar.biz]
Sent: Wednesday, August 27, 2014 1:14 PM
To: Dennis Hawk
Cc: michael.allison@neustar.biz; Jeanne.Mulcahy@neustar.biz
Subject: Grande Communications Case# TM9481 - Records Request

Legal Compliance Services

Dear Attorney Dennis J Hawk,

Pursuant to the subpoena directed at Grande Communications for copy write infringements, give us a call to discuss the request. A complete signed subpoena with the supporting judicially issued court order as required for this type of request is needed. We also need confirmation of the payment for this work that have been sent to you as well as an extended compliance date. These requests are all manual lookups and all of the subscribers for the IPs must be notified of the request.

Target Number - large number of IP look ups

Date Range - 07/25/2014 to 07/25/2014

Records Type - Additional Subscriber Info, Subscriber Info, MISC

Mulcahy, Jeanne Mulcahy, Jeanne

Phone: (877) 510-4357, Fax: (571) 434-3401

ATTACHMENT 2

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

In re Subpoena issued to
Grande Communications Networks LLC

§
§
§
§
§
§
§
§
§
§
§

Miscellaneous Case No: _____

DECLARATION OF CHARLES M. SALMON

I, Charles M. Salmon, hereby declare as follows:

1. My name is Charles M. Salmon. I am over 18 years of age, of sound mind, and fully competent to make this Declaration. I have personal knowledge of the matters stated herein, and they are true and correct. I am an attorney with Locke Lord LLP, which represents Internet service provider ("ISP") Grande Communications Networks LLC ("Grande") in connection with the above-styled matter.

2. In addition to this lawsuit, I am aware of a number of other federal proceedings in which Rightscorp, Inc. ("Rightscorp") has sought information of Internet subscribers through miscellaneous cases filed in federal district courts. My knowledge is based on research in the federal courts' Public Access to Court Electronic Records ("PACER") system. On September 4, 2014, I conducted a search in PACER for matters filed by Rightscorp. Attached hereto as Exhibit A is a true and correct copy of the compiled results of that PACER search.


3. For the Court's convenient reference, attached hereto as Exhibit B is a true and correct copy of the following document, which I retrieved from PACER on September 4, 2014:

Order Granting in Part Mot. for Expedited Disc. and for Extension of Time to Serve Defs.,
Combat Zone Corp. v. John/Jane Does 1-2, 12-cv-0142 (N.D. Miss. Dec. 6, 2012), ECF No. 18.

4. I declare under penalty of perjury that the above is true and correct.

DATED: September 5, 2014

FURTHER DECLARANT SAYETH NOT



Charles M. Salmon

EXHIBIT A
to the Declaration of Charles M. Salmon



Civil Party Search
 Thu Sep 4 21:18:25 2014
 109 records found

User: 112573
 Client: 9900007.00000 30394
 Search: Civil Party Search Name rightscorp All Courts Page: 1 sort: cs_date_filed

Party Name	Court	Case	NOS	Date Filed ▼	Date Closed
1 Rightscorp, Inc. (mov) Windstream Communications, Inc.	indce	1:2011-cv-03527	999	05/25/2011	05/28/2011
2 Rightscorp, Inc. (mov) Mediacom Communications Corp	indce	1:2011-cv-08430	999	09/15/2011	09/15/2011
3 RIGHTSCORP, INC. (mov) RIGHTSCORP, INC.	pawdce	2:2011-mc-00282		10/05/2011	
4 Rightscorp, Inc. (mov) In re Subpoena to Veracity Networks	indce	1:2011-cv-08865	999	12/14/2011	12/14/2011
5 RightsCorp Inc (res) Telscape Communications Inc v. RightsCorp Inc	cadce	2:2012-cv-08833	890	10/15/2012	11/08/2012
6 Rightscorp Inc (mov) In Re Great Works Internet et al	cadce	2:2014-mc-00096	890	02/27/2014	02/27/2014
7 Rightscorp Inc (mov) In re Subpoena to Spliffrock Telecom Coop et al	cadce	2:2014-mc-00097	890	02/27/2014	02/27/2014
8 Rightscorp Inc (mov) In re Subpoena to Sweetwater Cable TV	cadce	2:2014-mc-00095	890	02/27/2014	02/27/2014
9 Rightscorp Inc (mov) In Re Subpoena to Mid-Hudson Cablevision Inc et al	cadce	2:2014-mc-00094	890	02/27/2014	02/27/2014
10 Rightscorp Inc (mov) In Re Subpoena to HickoryTech Corporation et al	cadce	2:2014-mc-00093	890	02/27/2014	02/27/2014
11 Rightscorp, Inc. (mov) In re: Subpoena to Fidelity Communications Co.	cadce	2:2014-mc-00114	890	03/25/2014	03/25/2014
12 Rightscorp, Inc. (mov) In re: Cable America Missouri, LLC	cadce	2:2014-mc-00115	890	03/25/2014	03/25/2014
13 Rightscorp, Inc. (mov) In re: Subpoena to Arvig Enterprises, Inc.	cadce	2:2014-mc-00116	890	03/25/2014	03/25/2014
14 Rightscorp, Inc. (mov) In re: Subpoena to City of Wilson	cadce	2:2014-mc-00117	890	03/25/2014	03/25/2014
15 Rightscorp, Inc. (mov) In re: Subpoena to Alliance Communications	cadce	2:2014-mc-00127	890	03/31/2014	03/31/2014
16 Rightscorp, Inc. (mov) In re: Subpoena to Alliance Communications	cadce	2:2014-mc-00158	890	04/01/2014	04/01/2014
17 Rightscorp, Inc. (mov) In re: Subpoena to HTC Communications, Inc.	cadce	2:2014-mc-00177	890	04/03/2014	04/03/2014
18 Rightscorp, Inc. (mov) In re: Subpoena to INOC, LLC	cadce	2:2014-mc-00188	890	04/08/2014	04/08/2014
19 Rightscorp, Inc. (mov) In re: Subpoena to Pineland Telephone Cooperative, Inc.	cadce	2:2014-mc-00189	890	04/08/2014	04/08/2014
20 Rightscorp, Inc. (mov) In re: Subpoena to DTC Communications, Inc.	cadce	2:2014-mc-00190	890	04/08/2014	04/08/2014
21 Rightscorp, Inc. (mov) In re: Subpoena to Ritter Communications	cadce	2:2014-mc-00191	890	04/08/2014	04/08/2014
22 Rightscorp, Inc. (mov) In re: Subpoena to Sage Telecom Communications LLC	cadce	2:2014-mc-00196	890	04/16/2014	04/16/2014
23 Rightscorp, Inc. (mov) In re: Subpoena to Bee Line Cable	cadce	2:2014-mc-00198	890	04/16/2014	04/16/2014
24 Rightscorp, Inc. (mov) In re: Subpoena to MINET	cadce	2:2014-mc-00199	890	04/16/2014	04/16/2014
25 Rightscorp, Inc. (mov) In re: Subpoena to VTX Communications, LLC	cadce	2:2014-mc-00200	890	04/16/2014	04/16/2014
26 Rightscorp, Inc. (mov) In re: Subpoena to Smithville Telephone Company, Inc.	cadce	2:2014-mc-00201	890	04/16/2014	04/16/2014
27 Rightscorp, Inc. (mov) In re: Subpoena to NK Telco, Inc.	cadce	2:2014-mc-00202	890	04/16/2014	04/16/2014
28 Rightscorp, Inc. (mov) In re: Subpoena to Twin Lakes Telephone Cooperative Corporation	cadce	2:2014-mc-00197	890	04/21/2014	04/16/2014
29 Rightscorp, Inc. (mov) In re: Subpoena to Horry Telephone Cooperative, Inc.	cadce	2:2014-mc-00236	890	04/23/2014	04/23/2014
30 Rightscorp, Inc. (mov) In re: Subpoena to Hawaiian Telcom, Inc.	cadce	2:2014-mc-00237	890	04/23/2014	04/23/2014
31 Rightscorp, Inc. (mov) In re: Subpoena to City of Burlington	cadce	2:2014-mc-00238	890	04/23/2014	04/23/2014
32 Rightscorp, Inc. (mov) In re: Subpoena to San Bruno Municipal Cable Television	cadce	2:2014-mc-00239	890	04/23/2014	04/23/2014
33 Rightscorp, Inc. (mov) In re: Subpoena to Hotwire Communications, Ltd.	cadce	2:2014-mc-00240	890	04/23/2014	04/23/2014
34 Rightscorp, Inc. (mov) In Re: Subpoena to Great Works Internet	cadce	2:2014-mc-00251	890	04/30/2014	04/30/2014
35 RightsCorp Inc (mov) In Re: Subpoena to Star Wireless Inc	cadce	2:2014-mc-00252	890	04/30/2014	04/30/2014
36 RightsCorp Inc (mov) In Re: Subpoena to Alaska Communications Systems Group Inc	cadce	2:2014-mc-00253	890	04/30/2014	04/30/2014
37 RightsCorp Inc (mov) In Re: Subpoena to Florida Cable, Inc.	cadce	2:2014-mc-00254	890	04/30/2014	04/30/2014
38 RightsCorp Inc (mov) In Re: Subpoena to Sweetwater Cable TV	cadce	2:2014-mc-00255	890	04/30/2014	04/30/2014
39 RightsCorp Inc (mov) In Re: Subpoena to Great Works Internet	cadce	2:2014-mc-00274	890	05/07/2014	05/07/2014

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40 RightsCorp Inc (mov) In Re: Subpoena to Crestview Cable Communications	cacdce	2:2014-mc-00275	890	05/07/2014	05/07/2014
41 RightsCorp Inc (mov) In Re: Subpoena to Telsc ape Communications Inc	cacdce	2:2014-mc-00276	890	05/07/2014	05/07/2014
42 RightsCorp Inc (mov) In Re: Subpoena to IMON Communications LLC	cacdce	2:2014-mc-00277	890	05/07/2014	05/07/2014
43 RightsCorp Inc (mov) In Re: Subpoena to Enventis Corporation	cacdce	2:2014-mc-00278	890	05/07/2014	05/07/2014
44 RightsCorp Inc (mov) In Re: Subpoena to GLVW Broadband Inc	cacdce	2:2014-mc-00279	890	05/07/2014	05/07/2014
45 RightsCorp Inc (mov) In Re: Subpoena to MEI Telecom Inc	cacdce	2:2014-mc-00280	890	05/07/2014	05/07/2014
46 Rightscorp, Inc. (mov) In re: Subpoena to NTS Communications, Inc.	cacdce	2:2014-mc-00317	890	05/14/2014	05/14/2014
47 Rightscorp, Inc. (mov) In re: Subpoena to Alliance Communications	cacdce	2:2014-mc-00318	890	05/14/2014	05/14/2014
48 Rightscorp, Inc. (mov) In re Subpoena to Millenium Telecom LLC	cacdce	2:2014-mc-00319	890	05/14/2014	05/14/2014
49 Rightscorp, Inc. (mov) In re: Subpoena to Mid-Hudson Cablevision, Inc.	cacdce	2:2014-mc-00320	890	05/14/2014	05/14/2014
50 RightsCorp Inc (mov) In Re: Subpoena to Supranet Communications Inc	cacdce	2:2014-mc-00359	890	05/21/2014	05/21/2014
51 RightsCorp Inc (mov) Subpoena to West Wisconsin Telcom Cooperative Inc	cacdce	2:2014-mc-00360	890	05/21/2014	05/21/2014
52 RightsCorp Inc (mov) In Re Subpoena to Emery Telecommunications & Video Inc.	cacdce	2:2014-mc-00362	890	05/21/2014	05/21/2014
53 RightsCorp Inc (mov) In Re: Subpoena to Mid-Hudson Cablevision, Inc.	cacdce	2:2014-mc-00361	890	05/27/2014	05/21/2014
54 Rightscorp, Inc. (mov) In re: Subpoena to Chester Telephone Company	cacdce	2:2014-mc-00382	890	05/29/2014	05/29/2014

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55 Rightscorp, Inc. (mov) In re: Subpoena to Hart Communications, Inc.	cacdce	2:2014-mc-00383	890	05/29/2014	05/29/2014
56 Rightscorp, Inc. (mov) In re: Subpoena to West River Telecommunications Cooperative	cacdce	2:2014-mc-00384	890	05/29/2014	05/29/2014
57 Rightscorp, Inc. (mov) In re: Subpoena to HotWire Communications, Ltd.	cacdce	2:2014-mc-00385	890	05/29/2014	05/29/2014
58 Rightscorp, Inc. (mov) In re: Subpoena to City of Wilson	cacdce	2:2014-mc-00386	890	05/29/2014	05/29/2014
59 Rightscorp, Inc. (mov) In re: Subpoena to Baldwin Telecom, Inc.	cacdce	2:2014-mc-00387	890	05/29/2014	05/29/2014
60 RightsCorp Inc (mov) In Re: Subpoena to West Central Wireless	cacdce	2:2014-mc-00395	890	06/06/2014	06/06/2014
61 RightsCorp Inc (mov) In Re: Subpoena to PrimeLink, Inc	cacdce	2:2014-mc-00396	890	06/06/2014	06/06/2014
62 RightsCorp Inc (cmov) In Re: Subpoena to Plant Tifnet, Inc	cacdce	2:2014-mc-00397	890	06/06/2014	06/06/2014
63 RightsCorp Inc (mov) In Re: Subpoena to Bloomingdale Communications, Inc.	cacdce	2:2014-mc-00398	890	06/06/2014	06/06/2014
64 RightsCorp Inc (mov) In Re: Subpoena to MegaPath Corporation	cacdce	2:2014-mc-00399	890	06/06/2014	06/06/2014
65 RightsCorp Inc (mov) In Re: Subpoena to Irvine Community Television Inc	cacdce	2:2014-mc-00400	890	06/06/2014	06/06/2014
66 RightsCorp Inc (mov) In Re: Subpoena to Oxford Networks	cacdce	2:2014-mc-00401	890	06/06/2014	06/06/2014
67 RightsCorp Inc (mov) In Re: Subpoena to GVEC.net	cacdce	2:2014-mc-00431	890	06/12/2014	06/12/2014
68 RightsCorp Inc (mov) In Re: Subpoena to Citizens Telephone Co-Operative	cacdce	2:2014-mc-00432	890	06/12/2014	06/12/2014
69 RightsCorp Inc (mov) In Re: Subpoena to Arvig Enterprises Inc	cacdce	2:2014-mc-00433	890	06/12/2014	06/12/2014
70 RightsCorp Inc (mov) In Re: Subpoena to Tularosa Communications Inc	cacdce	2:2014-mc-00434	890	06/12/2014	06/12/2014
71 RIGHTSCORP (pla) RIGHTSCORP v. RITTER COMMUNICATIONS, INC.	tnwdce	2:2014-mc-00013		06/12/2014	
72 RightsCorp Inc (mov) In Re Subpoena to Hill Country Telephone Cooperative Inc	cacdce	2:2014-mc-00470	890	06/27/2014	06/27/2014
73 RightsCorp Inc (mov) In Re Subpoena to iFiber Communications Inc	cacdce	2:2014-mc-00471	890	06/27/2014	06/27/2014
74 RightsCorp Inc (mov) In Re: Subpoena to Cherryland Online Services	cacdce	2:2014-mc-00472	890	06/27/2014	06/27/2014
75 RightsCorp Inc (mov) In Re Subpoena to JAB Wireless, Inc	cacdce	2:2014-mc-00477	890	07/01/2014	07/01/2014
76 RightsCorp Inc (mov) In Re Subpoena to Pineland Telephone Cooperative, Inc.	cacdce	2:2014-mc-00478	890	07/01/2014	07/01/2014
77 RightsCorp Inc (mov) In Re Subpoena to Bee Line Cable	cacdce	2:2014-mc-00479	890	07/01/2014	07/01/2014
78 Rightscorp, Inc. (mov) In re: Subpoena to The City of Wadsworth	cacdce	2:2014-mc-00480	890	07/11/2014	07/11/2014
79 Rightscorp, Inc. (mov) In re: Subpoena to SpeedConnect, LLC	cacdce	2:2014-mc-00481	890	07/11/2014	07/11/2014
80 Rightscorp, Inc. (mov) In re: Subpoena to San Bruno Municipal Cable Television	cacdce	2:2014-mc-00482	890	07/11/2014	07/11/2014
81 Rightscorp, Inc. (mov) In re: Subpoena to Socket Telecom, LLC	cacdce	2:2014-mc-00483	890	07/11/2014	07/11/2014
82 Rightscorp, Inc. (mov) In re: Subpoena to City of Burlington dba Burlington Telecom	cacdce	2:2014-mc-00484	890	07/11/2014	07/11/2014
83 Rightscorp, Inc. (mov) In re: Subpoena to DTC Communications, Inc.	cacdce	2:2014-mc-00485	890	07/11/2014	07/11/2014
84 RightsCorp Inc (mov) In Re Subpoena to Westelcom Internet Inc	cacdce	2:2014-mc-00590	890	07/30/2014	07/30/2014
85 RightsCorp Inc (mov) In Re Subpoena to Velocity Network Inc	cacdce	2:2014-mc-00589	890	07/30/2014	07/30/2014
86 RightsCorp Inc (mov) In Re Subpoena to MTCO Communications Inc	cacdce	2:2014-mc-00588	890	07/30/2014	07/30/2014
87 RightsCorp Inc (mov) In Re Subpoena to Troy Cablevision Inc	cacdce	2:2014-mc-00586	890	07/30/2014	07/30/2014
88 RightsCorp Inc (mov) In Re Subpoena to Another Corporate ISP LLC	cacdce	2:2014-mc-00587	890	07/30/2014	07/30/2014
89 RightsCorp Inc (mov) In Re Subpoena to Hagray Communications Group Inc	cacdce	2:2014-mc-00584	890	07/30/2014	07/30/2014
90 RightsCorp Inc (mov) In Re Subpoena to Twin Lakes Telephone Cooperative Corporation	cacdce	2:2014-mc-00585	890	07/30/2014	07/30/2014
91 RightsCorp Inc (mov) In Re: Subpoena to Lakefield Communications Inc	cacdce	2:2014-mc-00625	890	08/06/2014	08/06/2014
92 RightsCorp Inc (mov) In Re Subpoena to Advanced Communications Technology Inc	cacdce	2:2014-mc-00626	890	08/06/2014	08/06/2014
93 RightsCorp Inc (mov) In Re Subpoena to Grande Communications Networks LLC	cacdce	2:2014-mc-00627	890	08/06/2014	08/06/2014

Party Name	Court	Case	NOS	Date Filed	Date Closed
94 RightsCorp Inc (mov) In Re Subpoena to Smart City Solutions LLC	cacdce	2:2014-mc-00628	890	08/06/2014	08/06/2014
95 RightsCorp Inc (mov) In Re Subpoena to Springcom, Inc. et al v. Springcom, Inc.	cacdce	2:2014-mc-00629	890	08/08/2014	08/08/2014
96 RightsCorp Inc (mov) In Re Subpoena to Allen's TV Cable Service, Inc.	cacdce	2:2014-mc-00630	890	08/08/2014	08/08/2014
97 RightsCorp Inc (mov) In Re Subpoena to Great Plains Communications Inc	cacdce	2:2014-mc-00631	890	08/08/2014	08/08/2014
98 RightsCorp Inc (mov) In Re Subpoena to Greenfield Communications Inc	cacdce	2:2014-mc-00635	890	08/14/2014	08/14/2014
99 RightsCorp Inc (mov) In Re Subpoena to Silver Star Communications	cacdce	2:2014-mc-00638	890	08/14/2014	08/14/2014
100 RightsCorp Inc (mov) In Re: Subpoena to Com Net, Inc.	cacdce	2:2014-mc-00637	890	08/14/2014	08/14/2014
101 RightsCorp Inc (mov) In Re: Subpoena to Chickasaw Telecommunications Services, Inc.	cacdce	2:2014-mc-00638	890	08/14/2014	08/14/2014
102 RightsCorp Inc (mov) In Re: Subpoena to 702 Communications	cacdce	2:2014-mc-00639	890	08/14/2014	08/14/2014
103 RightsCorp Inc (mov) In Re: Subpoena to Summit Broadband, Inc.	cacdce	2:2014-mc-00640	890	08/14/2014	08/14/2014
104 RightsCorp Inc (mov) In Re: Subpoena to The Darien Telephone Co. Inc.	cacdce	2:2014-mc-00641	890	08/14/2014	08/14/2014
105 RightsCorp Inc (mov) In Re: Subpoena to Quadrant, Inc.	cacdce	2:2014-mc-00643	890	08/25/2014	08/25/2014
106 Rightscorp, Inc. (mov) In Re: Millry Communications, Inc.	cacdce	2:2014-mc-00644	890	08/25/2014	08/25/2014
107 Rightscorp, Inc. (mov) In Re: Toledo Telephone Co., Inc.	cacdce	2:2014-mc-00645	890	08/25/2014	08/25/2014
108 Rightscorp, Inc. (mov) In Re: Alteva, Inc.	cacdce	2:2014-mc-00646	890	08/25/2014	08/25/2014

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109 Rightscorp, Inc. (mov) In Re: Full Channel, Inc.	cacdce	2:2014-mc-00647	890	08/25/2014	08/25/2014

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EXHIBIT B
to the Declaration of Charles M. Salmon

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
DELTA DIVISION

COMBAT ZONE CORP.

PLAINTIFF

V.

CIVIL ACTION NO. 2:12CV142-M-A

JOHN/JANE DOES 1-2

DEFENDANTS

ORDER GRANTING IN PART MOTION FOR EXPEDITED DISCOVERY
AND FOR EXTENSION OF TIME TO SERVE DEFENDANTS

Plaintiff has moved to serve third-party subpoenas on the Internet Service Providers (ISPs) of defendants before the Federal Rule of Civil Procedure 26(f) conference to determine the identities of defendants John/Jane Does 1-2. Docket # 3. For the reasons set forth below, plaintiff's Motion for Expedited Discovery is GRANTED in part and DENIED in part.

Plaintiff alleges that it is the owner of the copyright for a motion picture titled "Mommy and Me # 2" and that defendants "acted in a collective and interdependent manner in the unlawful reproduction and distribution of Plaintiff's Motion Picture using BitTorrent file transfer protocol." Docket 1. "BitTorrent is a peer-to-peer file sharing protocol used for distributing and sharing data on the Internet, including files containing digital versions of motion pictures." *Id.* at 5. Plaintiff only knows each defendant through the defendant's IP address on the date and at the time at which the infringing activity was observed. *Id.* at 3. Plaintiff wishes to subpoena the ISPs that issued the defendants' IP addresses to obtain the identities of the account holders for the IP addresses.

Rule 26(d)(1) provides that a "party may not seek discovery from any source before the parties have conferred as required by Rule 26(f), except . . . when authorized by . . . court

order.”¹ The Federal Rules do not dictate a specific protocol for determining whether expedited discovery is appropriate, but courts generally employ two standards: the preliminary injunction style analysis or the “good cause” standard. *St. Louis v. Metals & Additives Corp., Inc.*, 275 F.R.D. 236, 239 (S.D. Tex. 2011). Although the Fifth Circuit has not adopted either standard, the majority of courts, including others within the Fifth Circuit, have used the “good cause” standard, and this court will do the same. Under this standard, the court must consider whether the need for expedited discovery, as it relates to the administration of justice, outweighs the prejudice to the responding party. *Id.* “In essence, a “good cause” analysis is akin to a broader and more flexible totality of the circumstances analysis.” *Id.*, citing *Dimension Data N. Am., Inc. v. NetStar-1, Inc.*, 226 F.R.D. 528 (E.D. N.C. 2005) (“a standard based upon reasonableness or good cause, taking into account the totality of the circumstances, is more in keeping with discretion bestowed upon the court in the Federal Rules).

To support good cause Plaintiff submits that 1) Combat Zone has made a prima facie case for copyright infringement, 2) Combat Zone has identified specific information – the identities of the John/Jane Does – it seeks through discovery; 3) no alternative means exist to obtain the identities of the John/Jane Does; 4) Combat Zone cannot pursue its claims without the identities of the defendants; and 5) plaintiff’s interest in learning the identities of defendants outweighs

¹Plaintiff requests that the court’s Order indicate that the court contemplated, and its Order complies with, the Cable Privacy Act’s requirements found at 47 U.S.C. 551. Docket # 3, p. 6-7. However, based upon the court’s review of the Cable Privacy Act and other court’s opinions about the Act’s applicability to ISPs acting solely as conduits for communications between two internet users, such as persons sharing peer-to-peer files (P2P), the court is of the opinion that the Cable Privacy Act does not support the issuance of a § 512(h) subpoena to an ISP acting as a conduit for P2P sharing. *Recording Industry Ass’n. of Am., Inc. v. Verizon Internet Servs., Inc.*, 351 F.3d 1229, 1232-38 (D.C. Cir. 2003).

defendant's interests in remaining anonymous.

There is no way to avoid the fact that the John/Jane Doe defendants must be identified before the case may proceed, and the only way to obtain those identities is via a subpoena to the ISPs that retain the information necessary to correlate an IP address to a person. This process is not unusual and has been utilized in other cases. *See Arista Records LLC v. Does 1-16*, 604 F.3d 110 (2nd Cir. 2010); *Arista Records LLC v. Does 1-4*, 589 F.Supp.2d 151 (D. Conn. 2008). For these reasons, the undersigned finds that Combat Zone has demonstrated good cause for expedited discovery, and the issuance of subpoenas to the ISPs will be permitted subject to the notification requirements and other limitations set forth below. The court orders the following:

- (1) Plaintiff may immediately serve a subpoena under Federal Rule of Civil Procedure 45 on SBC Internet Services, Inc. and MetroCast Cablevision for each defendant to whom the ISP assigned an IP address. Each subpoena must be accompanied by a copy of this Order.
- (2) Within seven days of service of each subpoena, the ISPs must reasonably attempt to identify each defendant and provide him or her with a copy of the subpoena and this Order. If either ISP is unable to determine, to a reasonable degree of technical certainty, the identity of the user of a particular IP address, it must notify the plaintiff of that fact.
- (3) The ISPs are granted twenty-one (21) days from the date of service of the subpoena to move to quash or otherwise object to the subpoena. Each defendant is granted fourteen (14) days from the date of receipt of the subpoena from the ISP to move to quash or otherwise object to the subpoena.

- (4) Absent any motion to quash or objection, the ISPs must produce the information sought by plaintiff within twenty-one (21) days after notifying each defendant as required by paragraph (2) above.

The court will not address the issue of severance raised by SBC Internet Services, Inc. d/b/a AT&T Internet Services (“AT&T”) [Docket # 11] as the issue is premature and will be addressed at a later date if necessary. Similarly, plaintiff’s motion to conduct additional discovery in the form of interrogatories and requests for production or admissions directed to defendants once they are identified is DENIED. That request is also premature given that the defendants have not even been identified yet. The court will consider a renewed motion on this issue once defendants have been identified. Finally, although the court appointed attorney Paul Chiniche to represent the interests of the unnamed defendants in response to plaintiff’s Motion to Expedite Discovery, that appointment terminates upon entry of this Order, and he has no further responsibility to represent any party. Docket # 5. Once they have been identified by the ISPs, it is the responsibility of each defendant to secure the services of Mr. Chiniche or any other counsel of their own choosing if they wish to be represented by an attorney in this matter.

Plaintiff has requested an extension of time to serve defendants to avoid dismissal under Federal Rule of Civil Procedure 4(m). Because plaintiff needs additional time to obtain the identities of defendants, plaintiff’s request for an additional 90 days to serve defendants is GRANTED.

This, the 6th day of December, 2012.

/s/ S. Allan Alexander
UNITED STATES MAGISTRATE JUDGE