

1 the owners and users of the website domain names that are the subject of the above-captioned
2 litigation. **Exhibit 1** hereto is a true and correct copy of this subpoena to Network Solutions.

3 3. On March 21, 2013, Network Solutions' parent company, Web.com Group, Inc.,
4 produced documents from its records in response to the subpoena.

5 4. Attached hereto as **Exhibits 2, 3, and 4**, respectively are a record on the account
6 holder of the website domain name <atigeo.co>, excerpts of the primary user history record for
7 this account, and a record reflecting other website domain names held by this same account.

8 5. It is my understanding that Network Solutions created and maintained these
9 records during the ordinary course of its business.

10 6. Using the telephone number listed for the account holder identified in these reports
11 – 760-341-3289 – I performed a Google search of publicly available information on the Internet.
12 Those searches connected to websites showing that this telephone number is the contact number
13 for Demaratech LLC, which Burgyan has acknowledged is his company. In addition to listing
14 this telephone number for Demaratech, one website also identifies Demaratech's address as 42829
15 Cook Street, Palm Desert, CA 92211. A search using this telephone number and Burgyan's name
16 turned up another website identifying Burgyan as the owner of Demaratech and listing 760-341-
17 3289 as the contact number for Burgyan and Demaratech, along with the address listed in
18 Demaratech's business formation papers included in Burgyan's supplemental document
19 production of March 12, 2014. True and correct copies of screenshots of these Google search
20 results are attached hereto as **Exhibit 5**.

21 7. On January 8, 2014, Plaintiffs, through their counsel, served written discovery on each
22 Defendant in the above-captioned lawsuit.

23 8. On February 7, 2014, Defendant Offshore Ltd D served responses to Plaintiffs'
24 written discovery. **Exhibit 6** hereto is a true and correct copy of Offshore Ltd D's responses.

25 9. On February 7, 2014, Defendant Demaratech LLC served responses to Plaintiffs'
26 written discovery. **Exhibit 7** hereto is a true and correct copy of Demaratech's responses .

1 10. On February 7, 2014 Defendant Istvan Burgyan (“Burgyan”) served his first set of
2 responses and objections to Plaintiffs’ written discovery requests. Those responses are attached
3 as Exhibit 1 to the Declaration of Peter Nierman in support of Burgyan’s Motion for Summary
4 Judgment, filed with the Court as Dkt. 47.

5 11. On March 12, 2014, Burgyan filed supplemental responses and objections to
6 Plaintiffs’ written discovery requests. **Exhibit 8** hereto is a true and correct copy of Burgyan’s
7 supplemental responses.

8 12. Based on the records provided by Network Solutions, there is sufficient evidence
9 to conclude that Burgyan (directly or through an entity he owns or controls) owns, controls, or
10 uses the account under which the <atigeo.co> domain name is registered. These records also
11 show that this account was used to register and update the domain names of the other websites
12 that are the subject of the above-captioned lawsuit.

13 13. This evidence further warrants discovery into: (a) the activities of each Defendant
14 in this lawsuit in connection with the accounts identified in the Network Solutions records
15 attached hereto as Exhibits 3, 4, and 5, including payment and communication history; (b)
16 complete responses from all Defendants to Plaintiffs’ written discovery and document requests;
17 (c) depositions of each Defendant; and (d) if necessary, taking the depositions of nonparties with
18 the knowledge of the registration of the website domain names and the creation of the offending
19 websites and the statements made therein.

20 14. Based on the evidence gathered by Plaintiffs to date and submitted herewith, there
21 is sufficient reason to conclude that further discovery will show that Burgyan was involved in the
22 offending websites in at least the following ways: (a) Burgyan was responsible for the Network
23 Solutions account(s) used to register the offending website domain names; (b) Burgyan served as
24 the point of contact for the accused websites; and (c) Burgyan played a role in updating the
25 website domain names and publishing the content.
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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 24th day of March 2014 in Encino, California.

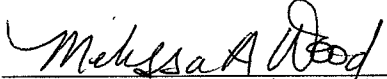
s/ Roland K. Tellis
Roland K. Tellis

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CERTIFICATE OF SERVICE

I hereby certify that on March 24, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the parties of record in the above case.

STOEL RIVES LLP



Melissa Wood, Practice Assistant
Dated at Seattle, WA on March 24, 2014