

DISTRICT COURT  
FOURTH JUDICIAL DISTRICT

<p>Alan Cooper,</p> <p>Plaintiff</p> <p>v.</p> <p>John Lawrence Steele, Prenda Law Inc., AF Holdings, LLC, Ingenuity13, LLC,</p> <p>Defendants</p>	<p>Court File No.:</p> <p><b>Plaintiff's First Set of Requests for Admissions</b></p>
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**TO: All Defendants**

Pursuant to Rules 26 and 36 of the Minnesota Rules of Civil Procedure, Plaintiff demands that you respond this First Set of Requests for Admissions under oath within 45 days of the date these Requests for Admission are served upon you. EACH DEFENDANT MUST SEPARATELY RESPOND TO AND SIGN THESE REQUESTS FOR ADMISSION.

## INSTRUCTIONS

The following instructions are to be followed when answering these Interrogatories:

A. The Request for Admission or subpart thereof being answered shall be restated immediately preceding the answer to that Request for Admission or subpart thereof.

B. In answering these Requests for Admission, use all information, however obtained, including hearsay, that is available to you and information known by or in

possession of yourself, your agents, your attorneys, and your accountants, or appearing in your records.

C. If you cannot answer the following Requests for Admissions in full after exercising due diligence to secure the full information to do so, state an answer to the extent possible, specifying your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information. Any such documents you reviewed should be specifically identified in your answer.

#### **DEFINITIONS**

1. The terms "Plaintiff" means Alan Cooper.
2. The terms "Defendants" shall mean John Lawrence Steele, Prenda Law, Inc., AF Holdings, LLC, and Ingenuity13, LLC.

#### **REQUESTS FOR ADMISSION**

1. Admit that Steele had hired Cooper as a caretaker for his property in Minnesota.
2. Admit that Steele owns real property in Minnesota.
3. Admit that sometime in 2012, Steele made attempts to prepare his Minnesota property for sale.
4. Admit that Steele had hired Cooper to repair or remodel his property in Minnesota.
5. Admit that prior to November 27, 2012, Steele had not given Cooper notice of any problems or deficiencies with services Cooper provided to Steele.
6. Admit that Exhibit A attached to the Complaint is a true and correct copy of an assignment agreement between Heartbreaker Films, LLC and AF Holdings, LLC.

7. Admit that Plaintiff did not sign Exhibit A.
8. Admit that Exhibit B attached to the Complaint is a true and correct copy of a document filed by Prenda Law, Inc. on behalf of Ingenuity13, LLC.
9. Admit that Plaintiff did not sign Exhibit B.
10. Admit that Prenda Law, Inc. does not have its possession, the original signed and notarized copy of Exhibit B.
11. Admit that Exhibit C attached to the Complaint is a true and correct copy of an agreement between Plaintiff and Defendant Steele.
12. Admit that Plaintiff's signature appears on Exhibit C.
13. Admit that Defendant Steele's signature appears on Exhibit C.
14. Admit that Plaintiff was never an officer, director, member, or employee of AF Holdings, LLC.
15. Admit that Plaintiff was never an officer, director, member, or employee of Ingenuity13, LLC.
16. Admit that AF Holdings, LLC is a limited liability company formed under the laws of St. Kitts & Nevis.
17. Admit that Ingenuity13, LLC is a limited liability company formed under the laws of St. Kitts & Nevis.
18. Admit that Prenda Law, Inc. is the successor firm to Steele Hansmeier, PLLC.
19. Admit that the Anti Piracy Law Group, PLLC is the successor firm to Prenda Law, Inc.


20. Admit that Steele has maintained substantial control of the day to day operations of Steele Hansmeier, Prenda Law, and Anti Piracy Law Group.
21. Admit that Steele owns or had owned shares of Prenda Law, Inc.
22. Admit that Steele owns a membership interest in AF Holdings, LLC.
23. Admit that Steele owns a membership interest in Ingenuity13, LLC.
24. Admit that one or more of the Defendants used Plaintiff's name to sign one or more assignment agreements between Heartbreaker Films, LLC and AF Holdings, LLC.
25. Admit that Defendants did not notify Plaintiff that his name was used to sign documents on behalf of AF Holdings, LLC.
26. Admit that Steele had told Cooper about Steele's plans involving copyright infringement litigation.
27. Admit that Steele instructed Cooper to contact Steele if Cooper was contacted regarding corporations or companies.
28. Admit that after receiving notice of representation from attorney Godfread, Steele made several attempts to contact Cooper.
29. Admit that Defendants have stated that a letter (Exhibit D to the Complaint) filed via ECF in the U.S. District Court for the District of Minnesota on November 29, 2012 by Cooper's attorney was false.
30. Admit that Defendants have not specified what in the letter referenced above was false.
31. Admit that the letter referenced in Request #29 (Exhibit D to the Complaint) is substantially true.

32. Admit that Defendants have not offered Plaintiff an explanation of why the name “Alan Cooper” appears on documents filed in cases by AF Holdings, LLC and Ingenuity13, LLC.
33. Admit that on December 7, 2012, Steele told Cooper’s attorney that Cooper had better “buckle up” because Steele intended to sue Cooper.
34. Admit that the statement made by Steele described in Request for Admission #33 was meant to imply that Steele intended to engage in prolonged and aggressive litigation.
35. Admit that prior to being contacted by Plaintiff’s attorney in late November 2012, Defendants had not threatened any cause of action against Plaintiff.
36. Admit that Defendants intended to use Plaintiff’s name for their own benefit.
37. Admit that Defendants have signed Plaintiff’s name to documents without Plaintiff’s knowledge.
38. Admit that Defendants have benefited from the use of Plaintiff’s name by using it on documents filed in courts.
39. Admit that AF Holdings, LLC did not maintain proper records as would be required for a limited liability company.
40. Admit that Ingenuity 13, LLC did not maintain proper records as would be required for a limited liability company.
41. Admit that AF Holdings, LLC was inadequately capitalized.
42. Admit that AF Holdings, LLC was created for the sole purpose of litigation.
43. Admit that AF Holdings, LLC has no revenue.

44. Admit that any revenue AF Holdings, LLC receives is obtained through litigation, legal settlements, or related activities.
45. Admit that Ingenuity 13, LLC was inadequately capitalized.
46. Admit that Ingenuity 13, LLC was created for the sole purpose of litigation.
47. Admit that Ingenuity 13, LLC has no revenue.
48. Admit that any revenue Ingenuity 13, LLC receives is obtained through litigation, legal settlements, or related activities.

Dated: January 23, 2013

GODFREAD LAW FIRM, PC

By:   
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Attorney for Plaintiff, Alan Cooper