

THE LAW FIRM OF BLAIR B. CHINTELLA

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July 5, 2013

PRESS RELEASE

On July 3, 2013 a hearing was held in the Northern District of Georgia regarding *AF Holdings, LLC v. Rajesh Patel*, 2:12-cv-00262-WCO, in which I represent Mr. Patel. This Release is to briefly summarize the legal aspects and my client's position on how it went.

The hearing began by defense counsel giving a brief overview of Prenda Law, Inc. and those affiliated with it, including John Steele, Paul Hansmeier, Paul Duffy, and Mark Lutz. Argument was made that Prenda Law (and Co.) are involved in a closely-knit nationwide litigation model of filing for the purpose of pressuring people into settling with no intention of actually litigating a case, as shown by the over 200 cases filed that have all been dismissed.

Initially, the Court instructed defense counsel to focus more on the evidence stemming from this case. Defense counsel pointed out that Prenda's entire business model makes it next to impossible to obtain such evidence because the case was already dismissed just as in other Prenda cases. Ultimately, the Court granted 60 days discovery so that Mr. Patel could obtain more evidence to support his arguments.

The Court also granted discovery to the plaintiff but asked Nazaire what he would use it for. Nazaire stated that he would probably depose Mr. Patel but defense counsel objected as to relevance since the case was dismissed with prejudice. Nazaire back peddled, stating that he would probably just send interrogatories.

The Court questioned Nazaire on several issues over the course of the hearing. Here are a few of the potentially legally significant statements/representations:

- Nazaire claims to have spoken with Mark Lutz multiple times regarding the case.
- He claims that he asked to see Hansmeier's technical evidence before filing the case but Prenda refused...but he nonetheless filed the case.
- Nazaire claims that it was Steele who informed him that there was acrimony between Steele and defense counsel, which was his reason for including it in the plaintiff's motion.¹
- Nazaire admitted never having met Raymond Rogers.
- Nazaire received documents from Prenda for the case, and admitted called Prenda's office for information, at one point speaking with "Mrs. Dugas."

The Court made clear that the legal and professionalism issues were separate. Regarding professionalism, the Court chastised opposing counsel Jacques Nazaire, at one point saying that the statements made were "despicable" and "unprofessional" and that Mr. Nazaire had a large

¹ On this point, defense counsel stated on the record several times for the Court that he has only spoken to Steele once to the best of his recollection, so there is no basis to allege some kind of acrimony with Steele.

hole to dig himself out of. However, the Court advised both parties that any unprofessional behavior will only harm rather than help one's case.

In a true sign of comity, the Court also chastised Nazaire for his statements regarding California. He also chastised him regarding the statements regarding DUI and supposed "terrorist" goals.

Overall, from Mr. Patel's position, we are quite pleased the way the hearing went. Initially, the judge seemed skeptical of information stemming from outside cases, but the more that Prenda's business model was explained and the connections were shown – e.g. Lutz as paralegal, registered agent for Prenda in Florida, CEO or "corporate representative" for multiple companies, etc. – it's our opinion that the Court granted discovery out of a concern for people like Mr. Patel who may be pressured into settling. Notably, the Court at one point referenced the multiple other nearly identical cases in the district that have been dismissed, and said several times that this case "concerned him."

Mr. Patel looks forward to discovery in order to vindicate his Due Process rights. On the following pages are several pieces of evidence that were submitted to the Court. Finally, the undersigned would like to personally thank Andrew Norton who showed up to be an expert witness.

Approved for Release July 5, 2013:

/s/ Blair Chintella

Blair Chintella

counsel is addicted, the undersigned must respond to protect his integrity.

From what has been put forth, Brett Gibbs is a fairly new attorney much like Defendant's counsel. The undersigned, on the other hand, has over 16 years experience practicing law, has settled over millions of dollars worth of cases, including state and federal cases and has also served in Afghanistan as a Foreign Claims Commissioner, settling foreign claims in a war zone.

The undersigned would not assign Brett Gibbs to negotiate a left turn with his vehicle, let alone a settlement on behalf of a client, regardless of whether the case was venued in Georgia, California or Afghanistan. While Gibbs may be a pleasant young man, to assert that Plaintiff's attorney takes orders from Brett Gibbs is absurd and laughable.

Defendant's counsel's so called evidence that Plaintiff's counsel has engaged in unethical behavior is that plaintiff's attorney's first name is not listed in an email address. Defense counsel cites Superior Court rule allegedly requiring the same. Mr. Chintella forgets this case is venued in federal court. Under Local Rule 11.1, Counsel's name, complete address, telephone number, facsimile number and Georgia Bar number shall appear on every pleading and other paper presented for filing. As this court will notice, Mr. Chintella is not in compliance with Local Rule 11.1. His facsimile number is absent on all documents filed by him. Nevertheless, Plaintiff's counsel is not seeking sanctions for such an immaterial omission. LR

1 Timothy J. Halloran - 104498
Thomas P. Mazzucco - 139758
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Tel: (415) 788-1900
4 Fax: (415) 393-8087

5 Specially Appearing for
JOHN STEELE
6
7

8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
10

11 INGENUITY 13 LLC,
12 Plaintiff,
13 v.
14 JOHN DOE,
15 Defendants.

Case No.: CV-12-8333- ODW(JC_x)

**DECLARATION OF
TIMOTHY HALLORAN
IN RESPONSE TO PUTATIVE
JOHN DOE'S REPLY BRIEF**

Judge: Hon. Otis D. Wright, II
Courtroom: 11
Date: April 2, 2013
Time: 10:00 A.M.

Complaint Filed: September 27, 2012
Trial Date: None

19 I, Timothy J. Halloran, declare that:

20 1. I am an attorney duly licensed to practice in all courts of the State of California, and am
21 a Senior Shareholder with the law firm of Murphy, Pearson, Bradley & Feeney, PC, attorneys of record
22 for specially appearing John Steele herein. I have personal knowledge of the information set forth
23 herein below, unless noted as based on information and belief, and if called upon to testify, I could and
24 would competently testify thereto.
25

26 2. Upon information and belief, attached as Exhibit "A" is a true and correct copy of a
27 notarized affidavit by Jacques Nazaire, dated April 18, 2013.
28

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct and that this Declaration was executed on this 18th day of April 2013, in San
3 Francisco, California.

4 Dated: April 18, 2013

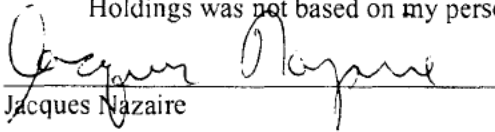
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By /s/ Timothy J. Halloran
Timothy J. Halloran

EXHIBIT A

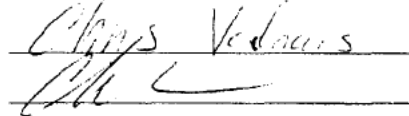
I, Jacques Nazaire, under the penalty of perjury, declare and state:

1. I am over eighteen years of age and am competent to testify as to the matters set forth herein. I make this affidavit on the basis of my personal knowledge and, if called, would be prepared to testify as follows.
2. I am attorney licensed to practice law in the State of Georgia.
3. I have represented AF Holdings LLC in several matters in Georgia.
4. On the occasion when I needed to speak with a representative for AF Holdings LLC, my point of contact was Brett Gibbs, who I understood to be the lead counsel for all the AF Holdings LLC cases nationwide.
5. The only person at AF Holdings LLC that I have spoken to is Mark Lutz, who I understand is the CEO of AF Holdings LLC.
6. I have spoken infrequently to Mr. John Steele over the past years. He has never indicated that he has an ownership interest in any of the clients that I have represented in Georgia, including AF Holdings LLC.
7. I have no reason to believe that Mr. John Steele has any ownership interest in any client I have ever represented.
8. Any statement I may have previously made about John Steele having an interest in AF Holdings was not based on my personal knowledge.



Jacques Nazaire

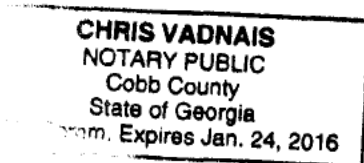
Subscribed and sworn to before me, this 18th day of April, 2013



NOTARY PUBLIC

Name of Notary

My commission expires: Jan 24, 2016.





bbc-Master bbc-Account <bbc.master.acct@gmail.com>

Re: Settlement

Jacques Nazaire <nazaire.jacques@gmail.com>

Tue, Mar 5, 2013 at 4:00 PM

To: Bchintel1 <bchintel1@gmail.com>

Blair:

We are willing to set it aside. I will send you the stip. I just need time to do it. I am not in my office right now.

As far the motion.

1) Mr. Patel has no excuse for his default such as illness, or death in the family or that he never received the papers.
2) As for Alan Cooper, he appears to be a disgruntled employee who was probably not paid what he wanted to be paid and as such he is suing Mr. Steele. Regardless of whether Cooper was branded as a janitor or president of AF Holdings, he is what they deemed him to be. I would like to subpoena him and have him state under oath that he has never received a dime from John Steele, who has interest in AF. Mr. Cooper's allegations are alone not enough to create fraud.

In any event, I will send you the stip to withdraw the entry of default later. I will also call you so that we may discuss where these cases are going.

-Jacques



bbc-Master bbc-Account <bbc.master.acct@gmail.com>

Re: Settlement

Bchintel1 <bchintel1@gmail.com>

Tue, Mar 5, 2013 at 4:39 PM

To: Jacques Nazaire <nazaire.jacques@gmail.com>

As far as the basis for setting aside the default, our clients obviously disagree. We don't think that it can only be set aside when there's something as serious as a death in the family, illness or not receiving the papers, etc....but send over the stipulation and I'll take a look at it so we can get the ball rolling on this thing...

Regarding Alan Cooper, if I understand you correctly: Alan Cooper was a disgruntled employee of AF Holdings who was paid by John Steele, because apparently Steele has an interest in the company, a company? When you say that he was what "they" deemed him to be I'm assuming that you're referring to Steele? So what was his actual position? Janitor? President? Anyhow, have you talked to Alan Cooper or who is giving you this information? Steele? Duffy? Gibbs?

Sincerely,

Blair Chintella
912-850-1885
404-579-9668
www.chintellalaw.com

Sample Cases



This is not the Mona Lisa

Prior to actually naming and serving individuals accused of various civil and criminal acts against our clients, we attempt to reach out and resolve the issue with the infringer/hacker directly. While we are able to resolve the matter in some cases, some alleged infringers wish to go to trial over the matter. In such cases, we accommodate the infringer by naming and serving them in their home state. Not responding to court documents is very dangerous, as it often leads to default judgments, like [this one](#) entered October 9, 2012 against Darryl Lassere. Below is a sample of individuals who chose to litigate the matter and are currently in court over their alleged infringement:

- [Stein Hals](#) Stein Hals - 3:12-CV-01189 (TN) ...
- [Michael Foote](#) Michael Foote - 1:12-CV-03570 (IL)...
- [Gerlad L. Glover, III](#) Gerald L. Glover, III - 1:12-CV-00808 JMS-DML (IN) ...
- [Theodore Hutcherson](#) Theodore Hutcherson - 3:12-CV-05833-JCS (CA)...
- [Sandipan Chowdhury](#) Sandipan Chowdhury - 1:12-CV-12105 (MA) ...
- [Matthew Burnell](#) Matthew Burnell - 1:12-CV-01256 (MI)...
- [Rajesh Patel](#) Rajesh Patel - 2:12-CV-00262-WCO (GA)...
- [Joseph Skoda](#) Joseph Skoda - 2:12-CV-01663-JAM-JFM (CA)...
- [June Quantong](#) June Quantong - 4:12-CV-02411-PJH (CA)...
- [Steven Pecadeso](#) Steven Pecadeso - 3:12-CV-02404-SC (CA)...
- [Joe Navasca](#) Joe Navasca - 3:12-CV-02396-EMC (CA)...
- [Chris Rogers](#) Chris Rogers - 3:12-CV-01519-BTM-BLM (CA) ...
- [Carlos Martinez](#) Carlos Martinez - 1:12-CV-03567 (IL) ...
- [Jason Hawk](#) Jason Hawk - 1:12-CV-04236 (IL) ...
- [Perry Miloglou](#) Perry Miloglou - 1:12-CV-05077 (IL)...
- [Ryan Jacobs](#) Ryan Jacobs - 1:12-CV-04240 (IL)...
- [Eleazar Santana](#) Eleazar Santana - 1:12-CV-04239 (IL) ...
- [Julio Baez](#) Julio Baez - 1:12-CV-06405 (IL) ...
- [Robert Olson](#) Robert Olson - 1:12-CV-00685-ML-LDA (RI) ...
- [John Foster](#) John Foster - 3:12-CV-30164-KPN (MA) ...
- [Joshua Demelo](#) Joshua Demelo - 1:12-CV-11851-MBB (MA)...
- [Alec Chrzanowski](#) Alec Chrzanowski - 1:12-CV-11842 (MA) ...

BitTorrent Betty's Tweets

Error: Twitter did not respond. Please wait a few minutes and refresh this page.

- [Maxime St. Louis](#) Maxime St. Louis - 4:12-CV-11797-TSH (MA) ...
- [Hajime Okuda](#) Hajime Okuda - 1:12-CV-11850-MLW (MA)...
- [John Grenier](#) John Grenier - 1:12-CV-11843 (MA)...
- [Jason Martinez](#) Jason Martinez - 1:12-CV-11848-PBS (MA) ...
- [Mayank Patel](#) Mayank Patel - 2:12-CV-06210 (NJ)...
- [Evans Papantouros](#) Evans Papantouros - 3:12-CV-06013-MAS-TJB (NJ)...
- [Frederick C. Highfield](#) Frederick C. Highfield - 1:12-CV-06033-JEI-AMD (NJ)...
- [Richard Lovejoy](#) Richard Lovejoy - CV-12-196 (ME)...
- [Thomas Lemay](#) Thomas Lemay - CV-12-197 (ME)...
- [Gary Millican](#) Gary Millican - 2:12-CV-00259 (GA) ...
- [Ben Sanders](#) Ben Sanders - 2:12-CV-00258-WCO (GA) ...
- [Benjamin Curtis](#) Benjamin Curtis - 1:12-CV-03773-CAP (GA)...
- [Robert Unger](#) Robert Unger - 1:12-CV-03665-RLV (GA)...
- [Paul Stapleton](#) Paul Stapleton - 1:12-CV-00166-WLS (GA) ...
- [Perry Jackson](#) Perry Jackson - 5:12-CV-00429-MTT (GA)...
- [Reginald Patterson](#) Reginald Patterson - 3:12-CV-00144-CAR (GA) ...
- [Justin Miller](#) Justin Miller - 3:12-CV-00143-CAR (GA)...
- [Nick Klimek](#) Nick Klimek - 1:12-CV-03838-TCB (GA)...
- [Tin Lam](#) Tin Lam - 1:12-CV-03771-ODE (GA)...
- [Michael Davidson](#) Michael Davidson - 1:12-CV-03772-RWS (GA) ...
- [Shainal Nagar](#) Shainal Nagar - 1:12-CV-03578-TWT (GA) ...
- [David Green, Jr.](#) David Green, Jr. - 1:12-CV-03557-JOF (GA)...
- [Howard Robinson](#) Howard Robinson - 1:12-CV-03542-ODE (GA) ...
- [Lorenzo Belmontes, Jr.](#) Lorenzo Belmontes, Jr - 2:12-CV-01067-KJM-CKD (CA)...
- [Taurence Lopez](#) Taurence Lopez - 4:12-CV-0741-DCB (AZ)...
- [James Forth](#) James Forth - 4:12-CV-00740-CKJ (AZ)...
- [Charlie Burrell](#) Charlie Burrell - 4:12-CV-00739-FRZ (AZ)...
- [Michael Tekala](#) Michael Tekala - 2:12-CV-02157-GMS (AZ) ...
- [Zeke Lundstrum](#) Zeke Lundstrum - 2:12-CV-02142-SRB (AZ) ...
- [Eric Lemnitzer](#) Eric Lemnitzer - 2:12-CV-02141-FJM (AZ)...
- [Carl Strickland](#) Carl Strickland - 2:12-CV-02140-ROS (AZ) ...
- [Andres Chen](#) Andres Chen - 2:12-CV-02151-MEA (AZ)...
- [Jerry Aurilia](#) Jerry Aurilia - 2:12-CV-02139-SPL (AZ) ...
- [Kevin Antrosiglio](#) Kevin Antrosiglio - 2:12-CV-02138-GMS (AZ) ...
- [Adam Nichols](#) Adam Nichols - 2:12-CV-02156-MHB (AZ) ...
- [Ngoc Nguyen](#) Ngoc Nguyen - 2:12-CV-02154-FJM (AZ) ...
- [Purnell Phillips](#) Purnell Phillips - 2:12-CV-02137-MEA (AZ)...
- [Jeff Montgomery](#) Jeff Montgomery - 2:12-CV-02153-ROS (AZ)...
- [Brian Trottier](#) Brian Trottier - 2:12-CV-02136-GMS (AZ)...
- [Erick Guevara](#) Erick Guevara - 2:12-CV-02152-JAT (AZ)...
- [Matthew Michuta](#) Matthew Michuta - 2:12-CV-02143-DGC (AZ) ...
- [Robert Richardson](#) Robert Richardson - 2:12-CV-02148-PGR (AZ)...
- [Andrew Simoneschi](#) Andrew Simoneschi - 2:12-CV-02147-PGR (AZ)...
- [Taylor Velasco](#) Taylor Velasco - 2:12-CV-02146-FJM (AZ)...
- [Douglas Buchanan](#) Douglas Buchanan - 2:12-CV-02145-DKD (AZ) ...
- [David Harris](#) David Harris - 2:12-CV-02144-MHB (AZ)...
- [Walter Szarek](#) Walter Szarek - 2:12-CV-2134-SPL (AZ)...
- [John Song](#) John Song - 2:12-CV-02132-GMS (AZ) ...

- [Steven Laizure](#) Steven Laizure - 2:12-CV-02131-DGC (AZ)...
- [Christopher Heggum](#) Christopher Heggum - 2:12-CV-02130-LOA (AZ)...
- [Rick Friend](#) Rick Friend - 2:12-CV-02125-NVM (AZ) ...
- [AJ Chubbuck](#) AJ Chubbuck - 2:12-CV-02124-DGC (AZ) ...
- [Danny Chambless](#) Danny Chambless - 1:12-CV-03839-AT (GA)...
- [Andrew Gutierrez](#) Andrew Gutierrez - 2:12-CV-02127-SPL (AZ) ...
- [Rim Boltong](#) Rim Boltong - 1:12-CV-03482-MHS (GA) ...
- [Matthew Taylor](#) Matthew Taylor - 3:12-CV-00160-TCB (GA) ...
- [Max Hilmo](#) Max Hilmo - 2:12-00263-WCO (GA)...
- [Christopher Eachus](#) Christopher Eachus - 1:12-CV-06032-JBS-AMD (NJ)...
- [Lazaro Ana Contreras](#) Lazaro Ana Contreras - 1:12-CV-06031-RMB-AMD (NJ)...
- [Steve Sullivan](#) Steve Sullivan - 1:12-CV-01100 (MI)...
- [Andrew Standley](#) Andrew Standley - 2:12-CV-14746-GAD-DRG (MI)...
- [Nicholas Bossard](#) Nicholas Bossard - 1:12-CV-01101 (MI)...
- [Michael Pacheco](#) Michael Pacheco - 1:12-CV-01102 (MI) ...
- [James Davis](#) James Davis - 1:12-CV-22149-JEM (FL) ...
- [Javier Ubieta](#) Javier Ubieta - 1:12-CV-22155-CMA (FL)...
- [Erik Diep](#) Erik Diep - 4:12-CV-14459-DPH-RSW (MI) ...
- [Nigel Sookdeo](#) Nigel Sookdeo - 1:12-CV-22146-CMA (FL)...
- [Vaden Cook](#) Vaden Cook - 5:12-CV-14455-SFC-DRG (MI)...
- [James Szewczyk](#) James Szewczyk - 2:12-CV-14453-MAG-LJM (MI)...
- [Allen Keehn](#) Allen Keehn - 2:12-CV-JAC-MKM (MI) ...
- [Joseph Jenkins](#) Joseph Jenkins - 2:12-CV-14450-DML-RSW (MI)...
- [David Olivo](#) David Olivo - 3:12-CV-01403 (CT)...
- [Elliott Olivas](#) Elliott Olivas - 3:12-CV-01401-JBA (CT)...
- [Kevin Nevins](#) Kevin Nevins - 3:12-CV-01404-SRU (CT) ...
- [Craig Fenn](#) Craig Fenn - 3:12-CV-01402-VLB (CT)...
- [Jonathan J. Abarca](#) Jonathan J. Abarca - 3:12-CV-01400-SRU (CT) ...
- [Udish Sundarrajan](#) Udish Sundarrajan - 2:12-CV-01078-GEB-GGH (CA) ...
- [Matthew Ciccone](#) Matthew Ciccone - 2:12-CV-14442-GAD-LJM (MI)...
- [Shehzad Lakdawala](#) Shehzad Lakdawala - 2:12-CV-14444-GCS-MKM (MI) ...
- [Jason Hinds](#) Jason Hinds - 2:12-CV-14445-AJT-MJH (MI)...
- [Michael Murray](#) Michael Murray - 2:12-CV-14443-GAD-LJM (MI)...
- [Matthew Baldwin](#) Matthew Baldwin - 1:12-CV-11841 (MA)...
- [Michael Nissensohn](#) Michael Nissensohn - 1:12-CV-00687-M-DLM (RI)...
- [Timothy Trafford](#) Timothy Trafford - 1:12-CV-00686-S-DLM (RI) ...
- [Norbert Weitendorf](#) Norbert Weitendorf - 1:12-CV-07826 (IL) ...
- [Dewey Wilson](#) Dewey Wilson - CV-2012-900893 (AL)...
- [Adam Sekora](#) Adam Sekora - CV-2012-053194 (AZ)...
- [World Timbers](#) World Timbers - CV-2012-053230 (AZ) ...
- [Reza Shemira](#) Reza Shemira - 37-2012-00100384 (CA)...
- [Jesse Nason](#) Jesse Nason - CV-2012-0057950 (CA)...
- [Samuel Teitelbaum](#) Samuel Teitelbaum - CV-2011-05628-JCS (CA)...
- [Joe Vasquez](#) Joe Vasquez - CV-2011-03080-MCE-KJN (CA)...
- [Jeff Goldberg](#) Jeff Goldberg - CV-2011-03074-KJM-CKD (CA)...
- [Jason Angle](#) Jason Angle - CV-2011-03077-JAM-KJN (CA)...
- [Sebastian Lopez](#) Sebastian Lopez - CV-2012-03114 (FL)...
- [Zachary Boudreaux](#) Zachary Boudreaux - CV-2012CA-01679 (FL) ...

- [Jacob McCullough](#) Jacob McCullough - CV-2012-21100-JAL (FL) ...
- [Tuan Nguyen](#) Tuan Nguyen - CV-2012-01685-MSS-MAP (FL)...
- [Paul Oppold](#) Paul Oppold - CV-2012-01686-MSS-AEP (FL) ...
- [Lucas Shashek](#) Lucas Shashek - CV-12-L-927 (IL)...
- [Ronald Trivisonno](#) Ronald Trivisonno - CV-2012-L-000531 (IL)...
- [Tom Berry](#) Tom Berry - CV-12-L-95 (IL)...
- [Michael Allison](#) Michael Allison - CV-2012-L-000530 (IL)...
- [Klint Christensen](#) Klint Christensen - CV-2011-08338 (IL)...
- [Edward Neese](#) Edward Neese - CV-2011-08340 (IL) ...
- [Hyung Kim](#) Hyung Kim - CV-2011-08343 (IL)...
- [Robert Reynolds](#) Robert Reynolds - CV-2012-01104 (IL)...
- [Jeremy Lozano](#) Jeremy Lozano - CV-2012-00812 (MI)...
- [Adam Grote](#) Adam Grote - CI-12-2625 (NE) ...
- [Austin Cunningham](#) Austin Cunningham - C-133,846 (TX) ...
- [Bobby Rammos](#) Bobby Rammos - CV-2012-04232 (CA)...
- [Felix Naylor](#) Felix Naylor - CV-2012-03566 (CA)...
- [Thang Ngo](#) Thang Ngo - CV-2012-02416-WHA (CA)...
- [David Trinh](#) David Trinh - CV-2012-02393-CRB (CA)...
- [Jason Hawk](#) Jason Hawk - CV-2012-04236 (IL)...
- [Kenneth Payne](#) Kenneth Payne - CV-2012-04234 (IL)...
- [Daniel Frankfort](#) Daniel Frankfort - CV-2012-03571 (IL) ...
- [Ali Yang](#) Ali Yang - CV-2012-01079 (CA)...
- [Cory Phan](#) Cory Phan - CV-2012-01076 (CA)...
- [Darryl Lessere](#) Darryl Lessere - CV-22156-UU (CA)...
- [Christopher Sanchez](#) Christopher Sanchez - 1:12-CV-03862-RLV (GA)...
- [Cristian Morinico](#) Cristian Morinico 2-12-CV-01969-MCE-CKD...

Unfortunately, due to space limitations, we are unable to list and provide the link to every individual we are currently suing on behalf of our clients. Also, it is our firm's policy to remove any cases from our site after we obtain a judgment or settlement. However, this list will be updated on a regular basis, so if you don't see a particular law suit listed above, feel free to call us at 1-800-380-0840 for more information.

<u>Date</u>	<u>Document</u>	<u>Statement</u>
8/22/2011	ILND Case # 1:10-cv-05606	Steele changes his address to Florida address.
1/26/2012	Steele Response to Bar Complaint, Page 6.	“The Prenda law firm is composed of Attorney Joe Perea and Paralegal Mark Lutz. Mr. Steele is actually a client of Prenda. Steele maintains an ownership interest in several of Prenda’s clients. His presence at Prenda would be solely in the capacity of a client.”
1/29/2012	AF Holdings v. Does 1-20; AZD 3:11-cv-00491	Steele lists his name as a contact for Prenda with a Prenda email address.
1/31/2012	Perea Response to Bar Complaint, Page 2.	“Mr. Steele has no role as an attorney with Prenda Law. However, I do regularly interact with Mr. Steele, since two of his companies are clients of Prenda Law . . .”
4/20/2012	AF Holdings Case in D.C., 1:12-cv-00048, ECF #32.	“I am of counsel with the law firm of Prenda Law, Inc.” ¶ 1. “My office address is 161 N. Clark Street, Suite 3200, Chicago, Illinois 60601. My office telephone number is (312) 880-9160.” ¶ 3.
12/17/2012	Steele Affidavit in Sunlust Case, ECF 40-5.	“My legal residence is Las Vegas, Nevada.” ¶ 2. “I am currently assisting in an of counsel capacity . . .” ¶ 4. “The computer my wife used at Steele Law, and other equipment that I no longer needed, was sold to Paul Duffy when he opened Prenda Law., Inc. in November 2011.” ¶ 11. “I have not been back to [Illinois Address] since 2011 except for 3 or 4 times to see Mr. Olson for lunch or to meet with Mr. Duffy about a case in Chicago we are working on together.”

		¶ 13.
12/20/2012	Sunlust Action, ECF #40	“The motion for sanctions contains further speculation that Mr. Steele continues to practice law in the building listed as Prenda Law’s address.” Page 5.
12/20/2012	Sunlust Action, ECF #42.	Steele’s attorneys argue that personal jurisdiction is lacking in Florida.
12/27/2012	Hearing Transcript in Sunlust Action	“I’m not an attorney with any law firm right now, but I have worked with Mr. Duffy in the past and am certainly familiar with this litigation just because I’ve been involved in many different cases like this in the past.” Page 12. [not sworn] “I do appear occasionally at hearings on an ad hoc basis, but I do not have any current clients.” Page 19. [unsworn]
3/8/2013	Declaration in California Action, ECF #83.	“I am of counsel with the law firm, Prenda Law, Inc.” ¶ 1. “I reside in the State of Florida. I both live in the State of Florida and intend to remain living in Florida. Although I make infrequent appearances in Illinois to perform legal services, I do not provide any legal services in either California or Florida.” ¶ 3.
4/2/2013	California Action Hearing Transcript, Page 7-8.	Steele’s attorney answers “Yes” when asked when AF Holdings and Ingenuity 13 are Steele’s clients.