

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

MALIBU MEDIA, LLC,
Plaintiff,

v.

JOHN DOE subscriber assigned IP address
173.64.119.92,
Defendant.

Case No. 1:14-cv-0223-MJG

Assigned to: Honorable Marvin J. Garbis
United States District Judge

MALIBU MEDIA, LLC,
Plaintiff,

v.

JOHN DOE subscriber assigned IP address
71.200.143.209,
Defendant.

Case No. 1:14-cv-0257-CCB

Assigned to: Honorable Catherine C. Blake
United States District Judge

MALIBU MEDIA, LLC,
Plaintiff,

v.

JOHN DOE subscriber assigned IP address
76.100.228.15
Defendant.

Case No. 1:14-cv-0263-RDB¹

Assigned to: Honorable Richard D. Bennett
United States District Judge

**ISP SUBSCRIBER'S RESPONSE TO MALIBU MEDIA'S
MOTION FOR EXTENSION OF TIME**

¹ An identical version of this document is being filed concurrently in all cases identified on the caption.

DECLARATION

I, Morgan E. Pietz, am over the age of 18. I hereby declare as follows:

1. I am a member in good standing of the State Bar of California, duly admitted to the practice of law in the state and federal courts of the State of California.
2. I represent the John Doe ISP subscribers who plaintiff Malibu Media, LLC (“**Malibu**”) accuses of being the defendant in this action, as identified on the caption above. I have also represented dozens of other Internet users who have been similarly targeted by Malibu in copyright infringement cases in other jurisdictions.
3. Attached hereto as Exhibit 1 is a true and correct copy of an email chain I was copied on from Verizon’s outside counsel Benjamin Fox to Malibu Media’s attorney Jon Hoppe, which also contains Mr. Hoppe’s prior correspondence to Verizon’s in-house subpoena response department.
4. Attached hereto as Exhibit 2 is a true and correct copy of Mr. Hoppe’s April 9, 2014 email to me where he requested an extension, and my reply to him shortly thereafter explaining why I had concerns about an extension on the so-called “Procedural Motion.”

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

Executed on April 13, 2014, at Manhattan Beach, California.

/s/ Morgan E. Pietz

Morgan E. Pietz, Esq., Declarant

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing paper with the Clerk of the Court using ECF, which will send notification of such filing to all attorneys of record.

/s/ Morgan E. Pietz

Morgan E. Pietz

DATED: April 14, 2014