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Attorneys for Defendant
John Doe

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO

MALIBU MEDIA, LLC,

Plaintiff,

vs.

JOHN DOE subscriber assigned IP
address 67.180.177.80,

Defendants.

CASE NO.: 3:16-CV-01005-WHA

Honorable William Alsup
Courtroom 8, 19th Floor

**SUPPLEMENTAL DECLARATION
OF BRUCE D. MAY IN SUPPORT
OF DEFENDANT JOHN DOE'S
MOTIONS FOR (1) AWARD OF
ATTORNEYS' FEES UNDER
SECTION 505 OF THE
COPYRIGHT ACT, AND (2) FOR
SANCTIONS UNDER THE
COURT'S INHERENT POWERS**

Date: September 29, 2016
Time: 8:00 a.m.
Ct: 8, 19th Floor

Complaint Filed: February 29, 2016
FAC File: June 1, 2016
Trial Date: September 5, 2017

Defendant JOHN DOE ("Defendant") respectfully submits this
Supplemental Declaration of Bruce D. May in support of both his Motion for
Award of Attorneys' Fees under the Copyright Act and Motion for Sanctions:

1 I, Bruce D. May, declare as follows:

2
3 1. I am an attorney duly licensed to practice in California since 1979 and
4 a partner in Stuart Kane LLP, the co-counsel of record for defendant JOHN DOE
5 ("Defendant.") I have been responsible for representing Defendant in this action
6 since its inception. I am making this Declaration In Support Of Defendant's
7 Motion for Award of Attorneys' Fees and Motion for Sanctions against Plaintiff
8 and attorneys Brian Heit and Brenna Erlbaum. If called as a witness, I could and
9 would testify competently from personal knowledge as to each of the facts set
10 forth in this Declaration.

11
12 2. As of September 1, 2016, Defendant John Doe has incurred a total of
13 \$46,148.12 in attorneys' fees for Bruce D. May and \$1,708.44 in attorney's fees
14 for local counsel Nicholas Ranallo to defend this action from the inception.
15 Defendant has also incurred a total of \$2,780 in fees for Setec Investigations to
16 conduct a forensic examination of Defendant's computer.

17
18 3. I expect Defendant will incur an additional \$1,050 in attorneys'
19 fees for my time preparing for and attending the Hearing on these motions, plus an
20 additional \$300 in expenses for air and ground transportation between Newport
21 Beach and San Francisco.

22
23 I declare under penalty of perjury under the laws of the United States of
24 America that the foregoing is true and correct and that this Supplemental
25 Declaration was executed in Newport Beach, California, on September 1, 2016.

26
27 
28 BRUCE D. MAY

CERTIFICATE OF SERVICE

Malibu Media, LLC v. John Doe
Case No. 3:16-cv-01005-WHA

I certify that on September 1, 2016, I served the foregoing

**SUPPLEMENTAL DECLARATION OF BRUCE D. MAY IN SUPPORT
OF DEFENDANT JOHN DOE'S MOTIONS FOR (1) AWARD OF
ATTORNEYS' FEES UNDER SECTION 505 OF THE COPYRIGHT ACT,
AND (2) FOR SANCTIONS UNDER THE COURT'S INHERENT
POWERS** on Plaintiff Malibu Media and its counsel by posting a true and
correct copy on the Court's electronic CM/ECF system for which they are
registered users.

Brenna E. Erlbaum, Esq.
Brian Heit, Esq.
HEIT ERLBAUM, LLP
6320 Canoga Avenue
15th Floor
Woodland Hills, CA 91367

Attorneys for MALIBU MEDIA, LLC

Telephone: 855.231.9868

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Brian.Heit@HElaw.attorney

I declare under penalty of perjury under the laws of the United States of
America that the foregoing is true and correct, and that this Certificate of Service
was executed in Newport Beach, California, on September 1, 2016.

/s/ Lorin Moreno

Lorin Moreno

9/1/2016

Date