

ATTACHMENT A

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Declarations by [Various Attorneys] in Support of Motion for Entry of Default Judgment

Against Defendant

A. Maryland cases

1. Malibu Media v. John Doe – Civ. Ac. No. 8:15-cv-3185-TDC (present case)
2. Malibu Media v. [Redacted] – Civ. Ac. No. 1:15-cv-01700-CCB
3. Malibu Media v. [Redacted] – Civ. Ac. No. 8:14-cv-03950-DKC
4. Malibu Media v. [Redacted] – Civ. Ac. No. 8:15-cv-00750-DKC

B. Ohio Cases

5. Malibu Media v. Brandon Griggs – Civ. Ac. No. 2:14-cv-00558-JLG-TPK
6. Malibu Media v. John Doe – Civ. Ac. No. 2:14-cv-00830-EAS-EPD
7. Malibu Media v. John Doe – Civ. Ac. No. 2:14-cv-01136-MHW-NMK
8. Malibu Media v. Lucas Caswell – Civ. Ac. No. 2:14-cv-00837-MHW-TPK

C. Various States

9. Malibu Media v. Alan Cowham – Civ. Ac. No. 3:13-cv-00162-PPS-CAN (N.D.Ind.)
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(D.N.J.)

A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

MALIBU MEDIA, LLC,

Plaintiff,

v.

Civil Action No. 8:15-cv-03185-TDC

[REDACTED],

Defendant.

DECLARATION OF JON A. HOPPE, ESQ. IN
SUPPORT OF MOTION FOR ENTRY OF DEFAULT JUDGMENT
AGAINST DEFENDANT [REDACTED]

Pursuant to 28 U.S.C. § 1746, I, Jon A. Hoppe, hereby declare:

1. I am an attorney with Law Offices of Jon A. Hoppe, Esquire, attorney for Plaintiff. Unless otherwise stated, I have personal knowledge of the following facts and, if called and sworn as a witness, could and would competently testify thereto.

2. On October 20, 2015, Plaintiff filed the Complaint in this action. [CM/ECF No. 1].

3. Pursuant to the issuance of third-party subpoenas, Defendant's Internet Service Providers ("ISP") disclosed Defendant's true identity to Plaintiff.

4. On February 22, 2016, Plaintiff filed the Amended Complaint in this action [CM/ECF Nos. 11, 12].

5. On March 22, 2017, a Clerk's default was entered against Defendant [REDACTED]. [CM/ECF Nos. 26, 27].

6. Defendant has failed to appear, plead or otherwise defend in this action.

7. Defendant is not a minor, incompetent, or in active duty military.

8. Plaintiff has incurred costs in this case in the amount of \$450.00, which includes a statutory filing fee of \$400.00 and process service fees of \$50.00.

9. The reasonable attorneys' fees for prosecuting this case are \$1,182.00, as further detailed below:

Date	Description	Hours
10/20/2015	Review Complaint and Exhibits	0.2
10/30/2015	Receipt and review of order allowing early discovery	0.3
03/06/2017	Review of docket and Clerk's Default documents	0.1
04/20/2017	Review of docket and Default Judgment documents	0.3
10/20/2015 -04/20/2017	Case management, managing paralegals and reviewing approximately 10 e-mails; miscellaneous	1.0
Total Hours:		1.9

Attorney billing rate: \$300.00 per hour – 1.9 hrs. x \$300.00 = \$570.00

Date	Description	Hours
10/19/2015	Draft Complaint, prepare for filing, and file	1.1
10/20/2015	Draft Motion for Leave to take early discovery and supporting documents; prepare for filing	0.5
10/30/2015	Prepare and issue subpoena to ISP; calendar and docket response date	0.5
01/10/2016 -03/07/2016	Receipt of Defendant's identity, amend Complaint to name Defendant; prepare summons; coordinate and effectuate service on Defendant	1.2
03/24/2016	Receipt and review affidavit of service; file, docket and calendar Defendant's deadline to answer	0.4
03/03/2017	Prepare Motion and Exhibits for Entry of Clerk's Default	0.3
04/20/2017	Prepare Motion, Memorandum of Points and Authority, Declaration of Attorney and Proposed Judgment for Default Final Judgment	1.1
10/19/2015 -04/20/2017	Case tracking and management; miscellaneous	2.1
Total Hours:		7.2

Paralegal billing rate: \$85.00 per hour – 7.2 hrs. x \$85.00 = \$612.00

Attorney billing rate: \$300.00 per hour – 1.9 hrs. x \$300.00 = \$570.00

TOTAL ATTORNEYS' FEES = \$1,182.00

FURTHER DECLARANT SAYETH NAUGHT.

DECLARATION

PURSUANT TO 28 U.S.C. § 1746, I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 21st day of April, 2017.

JON A. HOPPE, ESQ.

By: /s/ Jon A. Hoppe

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

MALIBU MEDIA, LLC,

Plaintiff,

v.

Civil Action No. 1:15-cv-01700-CCB

[REDACTED],

Defendant.

DECLARATION OF JON A. HOPPE, ESQ. IN
SUPPORT OF MOTION FOR ENTRY OF DEFAULT JUDGMENT
AGAINST DEFENDANT [REDACTED]

Pursuant to 28 U.S.C. § 1746, I, Jon A. Hoppe, hereby declare:

1. I am an attorney with the law firm of Maddox, Hoppe, Hoofnagle & Hafey, L.L.C., attorneys for Plaintiff. Unless otherwise stated, I have personal knowledge of the following facts and, if called and sworn as a witness, could and would competently testify thereto.

2. On June 11, 2015, Plaintiff filed the Complaint in this action. [CM/ECF No. 1].

3. Pursuant to the issuance of third-party subpoenas, Defendant's Internet Service Providers ("ISP") disclosed Defendant's true identity to Plaintiff.

4. On October 1, 2015, Plaintiff filed the Amended Complaint in this action [CM/ECF Nos. 7 & 8].

5. On November 23, 2015, a Clerk's default was entered against Defendant [REDACTED]. [CM/ECF No. 15].

6. Defendant has failed to appear, plead or otherwise defend in this action.

7. Defendant is not a minor, incompetent, or in active duty military.

8. Plaintiff has incurred costs in this case in the amount of \$450.00, which includes a statutory filing fee of \$400.00 and process service fees of \$50.00.

9. The reasonable attorneys' fees for prosecuting this case are \$1,182.00, as further detailed below:

Date	Description	Hours
06/11/2015	Review Complaint and Exhibits	0.2
06/16/2015	Receipt and review of order allowing early discovery	0.3
11/16/2015	Review of docket and Clerk's Default documents	0.1
12/09/2015	Review of docket and Default Judgment documents	0.3
06/11/2015 -12/09/2015	Case management, managing paralegals and reviewing approximately 10 e-mails; miscellaneous	1.0
Total Hours:		1.9

Attorney billing rate: \$300.00 per hour – 1.9 hrs. x \$300.00 = \$570.00

Date	Description	Hours
06/10/2015	Draft Complaint, prepare for filing, and file	1.1
06/11/2015	Draft Motion for Leave to take early discovery and supporting documents; prepare for filing	0.5
06/17/2015	Prepare and issue subpoena to ISP; calendar and docket response date	0.5
08/17/2015 -10/19/2015	Receipt of Defendant's identity, amend Complaint to name Defendant; prepare summons; coordinate and effectuate service on Defendant	1.2
10/21/2015	Receipt and review affidavit of service; file, docket and calendar Defendant's deadline to answer	0.4
11/15/2015	Prepare Motion and Exhibits for Entry of Clerk's Default	0.3
12/08/2015	Prepare Motion, Memorandum of Points and Authority, Declaration of Attorney and Proposed Judgment for Default Final Judgment	1.1
06/10/2015 -12/08/2015	Case tracking and management; miscellaneous	2.1
Total Hours:		7.2

Paralegal billing rate: \$85.00 per hour – 7.2 hrs. x \$85.00 = \$612.00

Attorney billing rate: \$300.00 per hour – 1.9 hrs. x \$300.00 = \$570.00

TOTAL ATTORNEYS' FEES = \$1,182.00

FURTHER DECLARANT SAYETH NAUGHT.

DECLARATION

PURSUANT TO 28 U.S.C. § 1746, I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 9th day of December, 2015.

JON A. HOPPE, ESQ.

By: /s/ Jon A. Hoppe

3

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

MALIBU MEDIA, LLC,

Plaintiff,

v.

Civil Action No. 8:14-cv-03950-DKC

[REDACTED],

Defendant.

DECLARATION OF JON A. HOPPE, ESQ. IN
SUPPORT OF MOTION FOR ENTRY OF DEFAULT JUDGMENT
AGAINST DEFENDANT [REDACTED]

Pursuant to 28 U.S.C. § 1746, I, Jon A. Hoppe, hereby declare:

1. I am an attorney with the law firm of Maddox, Hoppe, Hoofnagle & Hafey, L.L.C., attorneys for Plaintiff. Unless otherwise stated, I have personal knowledge of the following facts and, if called and sworn as a witness, could and would competently testify thereto.
2. On December 18, 2014, Plaintiff filed the Complaint in this action. [CM/ECF No. 1].
3. Pursuant to the issuance of third-party subpoenas, Defendant's Internet Service Providers ("ISP") disclosed Defendant's true identity to Plaintiff.
4. On May 21, 2015, Plaintiff filed the Amended Complaint in this action [CM/ECF Nos. 9 & 10].
5. On September 9, 2015, a Clerk's default was entered against Defendant [REDACTED]. [CM/ECF No. 18].
6. Defendant has failed to appear, plead or otherwise defend in this action.

7. Defendant is not a minor, incompetent, or in active duty military.

8. Plaintiff has incurred costs in this case in the amount of \$460.00, which includes a statutory filing fee of \$400.00 and process service fees of \$60.00.

9. The reasonable attorneys' fees for prosecuting this case are \$1,182.00, as further detailed below:

Date	Description	Hours
12/17/2014	Review Complaint and Exhibits	0.2
01/02/2015	Receipt and review of order allowing early discovery	0.3
08/14/2015	Review of docket and Clerk's Default documents	0.1
11/09/2015	Review of docket and Default Judgment documents	0.3
12/17/2014 -11/09/2015	Case management, managing paralegals and reviewing approximately 10 e-mails; miscellaneous	1.0
Total Hours:		1.9

Attorney billing rate: \$300.00 per hour – 1.9 hrs. x \$300.00 = \$570.00

Date	Description	Hours
12/16/2014	Draft Complaint, prepare for filing, and file	1.1
12/17/2014	Draft Motion for Leave to take early discovery and supporting documents; prepare for filing	0.5
01/02/2015	Prepare and issue subpoena to ISP; calendar and docket response date	0.5
04/20/2015 -06/30/2015	Receipt of Defendant's identity, amend Complaint to name Defendant; prepare summons; coordinate and effectuate service on Defendant	1.2
07/02/2015	Receipt and review affidavit of service; file, docket and calendar Defendant's deadline to answer	0.4
08/14/2015	Prepare Motion and Exhibits for Entry of Clerk's Default	0.3
11/09/2015	Prepare Motion, Memorandum of Points and Authority, Declaration of Attorney and Proposed Judgment for Default Final Judgment	1.1
12/16/2014 -11/09/2015	Case tracking and management; miscellaneous	2.1
Total Hours:		7.2

Paralegal billing rate: \$85.00 per hour – 7.2 hrs. x \$85.00 = \$612.00

Attorney billing rate: \$300.00 per hour – 1.9 hrs. x \$300.00 = \$570.00

TOTAL ATTORNEYS' FEES = \$1,182.00

FURTHER DECLARANT SAYETH NAUGHT.

DECLARATION

PURSUANT TO 28 U.S.C. § 1746, I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 12th day of November, 2015.

JON A. HOPPE, ESQ.

By: /s/ Jon A. Hoppe

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

MALIBU MEDIA, LLC,

Plaintiff,

v.

Civil Action No. 8:15-cv-00750-DKC

[REDACTED],

Defendant.

**DECLARATION OF JON A. HOPPE, ESQ. IN
SUPPORT OF MOTION FOR ENTRY OF DEFAULT JUDGMENT
AGAINST DEFENDANT [REDACTED]**

Pursuant to 28 U.S.C. § 1746, I, Jon A. Hoppe, hereby declare:

1. I am an attorney with the law firm of Maddox, Hoppe, Hoofnagle & Hafey, L.L.C., attorneys for Plaintiff. Unless otherwise stated, I have personal knowledge of the following facts and, if called and sworn as a witness, could and would competently testify thereto.

2. On March 17, 2015, Plaintiff filed the Complaint in this action. [CM/ECF No. 1].

3. Pursuant to the issuance of third-party subpoenas, Defendant's Internet Service Providers ("ISP") disclosed Defendant's true identity to Plaintiff.

4. On September 23, 2015, Plaintiff filed the Amended Complaint in this action [CM/ECF Nos. 11 & 12].

5. On April 7, 2016, a Clerk's default was entered against Defendant [REDACTED]. [CM/ECF No. 27].

6. Defendant has failed to appear, plead or otherwise defend in this action.

7. Defendant is not a minor, incompetent, or in active duty military.

8. Plaintiff has incurred costs in this case in the amount of \$480.00, which includes a statutory filing fee of \$400.00 and process service fees of \$80.00.

9. The reasonable attorneys' fees for prosecuting this case are \$1,182.00, as further detailed below:

Date	Description	Hours
03/17/2015	Review Complaint and Exhibits	0.2
03/19/2015	Receipt and review of order allowing early discovery	0.3
02/22/2016	Review of docket and Clerk's Default documents	0.1
05/28/2016	Review of docket and Default Judgment documents	0.3
03/17/2015 -05/27/2016	Case management, managing paralegals and reviewing approximately 10 e-mails; miscellaneous	1.0
Total Hours:		1.9

Attorney billing rate: \$300.00 per hour – 1.9 hrs. x \$300.00 = \$570.00

Date	Description	Hours
03/16/2015	Draft Complaint, prepare for filing, and file	1.1
03/17/2015	Draft Motion for Leave to take early discovery and supporting documents; prepare for filing	0.5
03/19/2015	Prepare and issue subpoena to ISP; calendar and docket response date	0.5
06/22/2015 -01/04/2016	Receipt of Defendant's identity, amend Complaint to name Defendant; prepare summons; coordinate and effectuate service on Defendant	1.2
01/12/2016	Receipt and review affidavit of service; file, docket and calendar Defendant's deadline to answer	0.4
02/19/2016	Prepare Motion and Exhibits for Entry of Clerk's Default	0.3
05/27/2016	Prepare Motion, Memorandum of Points and Authority, Declaration of Attorney and Proposed Judgment for Default Final Judgment	1.1
03/16/2015 -05/28/2016	Case tracking and management; miscellaneous	2.1
Total Hours:		7.2

Paralegal billing rate: \$85.00 per hour – 7.2 hrs. x \$85.00 = \$612.00

Attorney billing rate: \$300.00 per hour – 1.9 hrs. x \$300.00 = \$570.00

TOTAL ATTORNEYS' FEES = \$1,182.00

FURTHER DECLARANT SAYETH NAUGHT.

DECLARATION

PURSUANT TO 28 U.S.C. § 1746, I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 28th day of May, 2016.

JON A. HOPPE, ESQ.

By: /s/ Jon A. Hoppe

B

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO

MALIBU MEDIA, LLC,

Plaintiff,

v.

Civil Action No. 2:14-cv-00558-JLG-TPK

BRANDON GRIGGS,

Defendant.

**DECLARATION OF YOUSEF M. FARONIYA, ESQ. IN
SUPPORT OF MOTION FOR ENTRY OF DEFAULT JUDGMENT
AGAINST DEFENDANT BRANDON GRIGGS**

Pursuant to 28 U.S.C. § 1746, I, Yousef M. Faroniya, hereby declare:

1. I am an attorney with the law firm of The Law Office of Yousef M. Faroniya, attorneys for Plaintiff. Unless otherwise stated, I have personal knowledge of the following facts and, if called and sworn as a witness, could and would competently testify thereto.
2. On June 12, 2014, Plaintiff filed the Complaint in this action. [CM/ECF No. 1].
3. Pursuant to the issuance of third-party subpoenas, Defendant's Internet Service Providers ("ISP") disclosed Defendant's true identity to Plaintiff.
4. On September 15, 2014, Plaintiff filed the Amended Complaint in this action [CM/ECF No. 6].
5. On April 16, 2015, a Clerk's default was entered against Defendant Brandon Griggs. [CM/ECF No. 10].
6. Defendant has failed to appear, plead or otherwise defend in this action.
7. Defendant is not a minor, incompetent, or in active duty military.

8. Plaintiff has incurred costs in this case in the amount of \$475.00, which includes a statutory filing fee of \$400.00 and process service fees of \$75.00.

9. The reasonable attorneys' fees for prosecuting this case are \$1,182.00, as further detailed below:

Date	Description	Hours
06/11/2014	Review Complaint and Exhibits	0.2
06/25/2014	Receipt and review of order allowing early discovery	0.3
11/10/2014	Review of docket and Clerk's Default documents	0.1
05/15/2015	Review of docket and Default Judgment documents	0.3
06/11/2014 -05/15/2015	Case management, managing paralegals and reviewing approximately 10 e-mails; miscellaneous	1.0
Total Hours:		1.9

Attorney billing rate: \$300.00 per hour – 1.9 hrs. x \$300.00 = \$570.00

Date	Description	Hours
06/10/2014	Draft Complaint, prepare for filing, and file	1.1
06/11/2014	Draft Motion for Leave to take early discovery and supporting documents; prepare for filing	0.5
06/25/2014	Prepare and issue subpoena to ISP; calendar and docket response date	0.5
09/03/2014 -09/30/2014	Receipt of Defendant's identity, amend Complaint to name Defendant; prepare summons; coordinate and effectuate service on Defendant	1.2
10/02/2014	Receipt and review affidavit of service; file, docket and calendar Defendant's deadline to answer	0.4
11/07/2014	Prepare Motion and Exhibits for Entry of Clerk's Default	0.3
05/14/2015	Prepare Motion, Memorandum of Points and Authority, Declaration of Attorney and Proposed Judgment for Default Final Judgment	1.1
06/10/2014 -05/14/2015	Case tracking and management; miscellaneous	2.1
Total Hours:		7.2

Paralegal billing rate: \$85.00 per hour – 7.2 hrs. x \$85.00 = \$612.00

Attorney billing rate: \$300.00 per hour – 1.9 hrs. x \$300.00 = \$570.00

TOTAL ATTORNEYS' FEES = \$1,182.00

FURTHER DECLARANT SAYETH NAUGHT.

DECLARATION

PURSUANT TO 28 U.S.C. § 1746, I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 19th day of May, 2015.

YUSEF M. FARONIYA, ESQ.

By: /s/ Yousef M. Faroniya

6

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO

MALIBU MEDIA, LLC,

Plaintiff,

v.

Civil Action No. 2:14-cv-00830-EAS-EPD

██████████,

Defendant.

**DECLARATION OF YOUSEF M. FARONIYA, ESQ. IN
SUPPORT OF MOTION FOR ENTRY OF DEFAULT JUDGMENT
AGAINST DEFENDANT ██████████**

Pursuant to 28 U.S.C. § 1746, I, Yousef M. Faroniya, hereby declare:

1. I am an attorney with the law firm of The Law Office of Yousef M. Faroniya, attorneys for Plaintiff. Unless otherwise stated, I have personal knowledge of the following facts and, if called and sworn as a witness, could and would competently testify thereto.
2. On July 14, 2014, Plaintiff filed the Complaint in this action. [CM/ECF No. 1].
3. Pursuant to the issuance of third-party subpoenas, Defendant's Internet Service Providers ("ISP") disclosed Defendant's true identity to Plaintiff.
4. On September 26, 2014, Plaintiff filed the Amended Complaint in this action [CM/ECF No. 5].
5. On December 10, 2014, a Clerk's default was entered against Defendant ██████████ ██████████. [CM/ECF No. 9].
6. Defendant has failed to appear, plead or otherwise defend in this action.
7. Defendant is not a minor, incompetent, or in active duty military.

8. Plaintiff has incurred costs in this case in the amount of \$475.00, which includes a statutory filing fee of \$400.00 and process service fees of \$75.00.

9. The reasonable attorneys' fees for prosecuting this case are \$1,182.00, as further detailed below:

Date	Description	Hours
07/11/2014	Review Complaint and Exhibits	0.2
07/15/2014	Receipt and review of order allowing early discovery	0.3
12/08/2014	Review of docket and Clerk's Default documents	0.1
02/16/2015	Review of docket and Default Judgment documents	0.3
07/11/2014	Case management, managing paralegals and reviewing	1.0
-02/16/2015	approximately 10 e-mails; miscellaneous	
Total Hours:		1.9

Attorney billing rate: \$300.00 per hour – 1.9 hrs. x \$300.00 = \$570.00

Date	Description	Hours
07/10/2014	Draft Complaint, prepare for filing, and file	1.1
07/11/2014	Draft Motion for Leave to take early discovery and supporting documents; prepare for filing	0.5
07/15/2014	Prepare and issue subpoena to ISP; calendar and docket response date	0.5
09/11/2014 -10/04/2014	Receipt of Defendant's identity, amend Complaint to name Defendant; prepare summons; coordinate and effectuate service on Defendant	1.2
10/14/2014	Receipt and review affidavit of service; file, docket and calendar Defendant's deadline to answer	0.4
12/08/2014	Prepare Motion and Exhibits for Entry of Clerk's Default	0.3
02/13/2015	Prepare Motion, Memorandum of Points and Authority, Declaration of Attorney and Proposed Judgment for Default Final Judgment	1.1
07/10/2014 -02/16/2015	Case tracking and management; miscellaneous	2.1
Total Hours:		7.2

Paralegal billing rate: \$85.00 per hour – 7.2 hrs. x \$85.00 = \$612.00

Attorney billing rate: \$300.00 per hour – 1.9 hrs. x \$300.00 = \$570.00

TOTAL ATTORNEYS' FEES = \$1,182.00

FURTHER DECLARANT SAYETH NAUGHT.

DECLARATION

PURSUANT TO 28 U.S.C. § 1746, I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 16 day of February, 2015.

YUSEF M. FARONIYA, ESQ.

By: /s/ Yousef M. Faroniya

7

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO

MALIBU MEDIA, LLC,

Plaintiff,

v.

Civil Action No. 2:14-cv-01136-MHW-NMK

██████████,
Defendant.

**DECLARATION OF YOUSEF M. FARONIYA, ESQ. IN
SUPPORT OF MOTION FOR ENTRY OF DEFAULT JUDGMENT
AGAINST DEFENDANT ██████████**

Pursuant to 28 U.S.C. § 1746, I, Yousef M. Faroniya, hereby declare:

1. I am an attorney with the law firm of The Law Office of Yousef M. Faroniya, attorneys for Plaintiff. Unless otherwise stated, I have personal knowledge of the following facts and, if called and sworn as a witness, could and would competently testify thereto.
2. On August 6, 2014, Plaintiff filed the Complaint in this action. [CM/ECF No. 1].
3. Pursuant to the issuance of third-party subpoenas, Defendant's Internet Service Providers ("ISP") disclosed Defendant's true identity to Plaintiff.
4. On November 6, 2014, Plaintiff filed the Amended Complaint in this action [CM/ECF No. 5].
5. On March 19, 2015, a Clerk's default was entered against Defendant ██████████ ██████████. [CM/ECF No. 20].
6. Defendant has failed to appear, plead or otherwise defend in this action.
7. Defendant is not a minor, incompetent, or in active duty military.

8. Plaintiff has incurred costs in this case in the amount of \$475.00, which includes a statutory filing fee of \$400.00 and process service fees of \$75.00.

9. The reasonable attorneys' fees for prosecuting this case are \$1,182.00, as further detailed below:

Date	Description	Hours
08/05/2014	Review Complaint and Exhibits	0.2
08/07/2014	Receipt and review of order allowing early discovery	0.3
03/17/2014	Review of docket and Clerk's Default documents	0.1
05/04/2015	Review of docket and Default Judgment documents	0.3
08/05/2014 -05/04/2015	Case management, managing paralegals and reviewing approximately 10 e-mails; miscellaneous	1.0
Total Hours:		1.9

Attorney billing rate: \$300.00 per hour – 1.9 hrs. x \$300.00 = \$570.00

Date	Description	Hours
08/05/2014	Draft Complaint, prepare for filing, and file	1.1
08/06/2014	Draft Motion for Leave to take early discovery and supporting documents; prepare for filing	0.5
08/08/2014	Prepare and issue subpoena to ISP; calendar and docket response date	0.5
11/03/2014 -01/17/2015	Receipt of Defendant's identity, amend Complaint to name Defendant; prepare summons; coordinate and effectuate service on Defendant	1.2
01/20/2015	Receipt and review affidavit of service; file, docket and calendar Defendant's deadline to answer	0.4
03/17/2015	Prepare Motion and Exhibits for Entry of Clerk's Default	0.3
05/01/2015	Prepare Motion, Memorandum of Points and Authority, Declaration of Attorney and Proposed Judgment for Default Final Judgment	1.1
08/05/2014 -05/04/2015	Case tracking and management; miscellaneous	2.1
Total Hours:		7.2

Paralegal billing rate: \$85.00 per hour – 7.2 hrs. x \$85.00 = \$612.00

Attorney billing rate: \$300.00 per hour – 1.9 hrs. x \$300.00 = \$570.00

TOTAL ATTORNEYS' FEES = \$1,182.00

FURTHER DECLARANT SAYETH NAUGHT.

DECLARATION

PURSUANT TO 28 U.S.C. § 1746, I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 7th day of May, 2015.

YOUSSEF M. FARONIYA, ESQ.

By: /s/ Yousef M. Faroniya

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO

MALIBU MEDIA, LLC,

Plaintiff,

v.

Civil Action No. 2:14-cv-00837-MHW-TPK

LUCAS CASWELL,

Defendant.

/

**DECLARATION OF YOUSEF M. FARONIYA, ESQ. IN
SUPPORT OF MOTION FOR ENTRY OF DEFAULT JUDGMENT
AGAINST DEFENDANT LUCAS CASWELL**

Pursuant to 28 U.S.C. § 1746, I, Yousef M. Faroniya, hereby declare:

1. I am an attorney with the law firm of The Law Office of Yousef M. Faroniya, attorneys for Plaintiff. Unless otherwise stated, I have personal knowledge of the following facts and, if called and sworn as a witness, could and would competently testify thereto.
2. On July 14, 2014, Plaintiff filed the Complaint in this action. [CM/ECF No. 1].
3. Pursuant to the issuance of third-party subpoenas, Defendant's Internet Service Providers ("ISP") disclosed Defendant's true identity to Plaintiff.
4. On September 22, 2014, Plaintiff filed the Amended Complaint in this action [CM/ECF No. 5].
5. On March 11, 2015, a Clerk's default was entered against Defendant Lucas Caswell. [CM/ECF No. 10].
6. Defendant has failed to appear, plead or otherwise defend in this action.
7. Defendant is not a minor, incompetent, or in active duty military.

8. Plaintiff has incurred costs in this case in the amount of \$475.00, which includes a statutory filing fee of \$400.00 and process service fees of \$75.00.

9. The reasonable attorneys' fees for prosecuting this case are \$1,182.00, as further detailed below:

Date	Description	Hours
07/11/2014	Review Complaint and Exhibits	0.2
07/15/2014	Receipt and review of order allowing early discovery	0.3
11/17/2014	Review of docket and Clerk's Default documents	0.1
05/15/2015	Review of docket and Default Judgment documents	0.3
07/11/2014 -05/15/2015	Case management, managing paralegals and reviewing approximately 10 e-mails; miscellaneous	1.0
Total Hours:		1.9

Attorney billing rate: \$300.00 per hour – 1.9 hrs. x \$300.00 = \$570.00

Date	Description	Hours
07/10/2014	Draft Complaint, prepare for filing, and file	1.1
07/11/2014	Draft Motion for Leave to take early discovery and supporting documents; prepare for filing	0.5
07/15/2014	Prepare and issue subpoena to ISP; calendar and docket response date	0.5
09/11/2014 -10/08/2014	Receipt of Defendant's identity, amend Complaint to name Defendant; prepare summons; coordinate and effectuate service on Defendant	1.2
10/10/2014	Receipt and review affidavit of service; file, docket and calendar Defendant's deadline to answer	0.4
11/14/2014	Prepare Motion and Exhibits for Entry of Clerk's Default	0.3
05/14/2015	Prepare Motion, Memorandum of Points and Authority, Declaration of Attorney and Proposed Judgment for Default Final Judgment	1.1
07/10/2014 -05/14/2015	Case tracking and management; miscellaneous	2.1
Total Hours:		7.2

Paralegal billing rate: \$85.00 per hour – 7.2 hrs. x \$85.00 = \$612.00

Attorney billing rate: \$300.00 per hour – 1.9 hrs. x \$300.00 = \$570.00

TOTAL ATTORNEYS' FEES = \$1,182.00

FURTHER DECLARANT SAYETH NAUGHT.

DECLARATION

PURSUANT TO 28 U.S.C. § 1746, I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 19th day of May, 2015.

YOUSEF M. FARONIYA, ESQ.

By: /s/ Yousef M. Faroniya

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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF INDIANA**

MALIBU MEDIA, LLC,

Plaintiff,

v.

Civil Action No. 3:13-cv-00162-PPS-CAN

ALAN COWHAM,

Defendant.

**DECLARATION OF PAUL J. NICOLETTI, ESQ. IN
SUPPORT OF MOTION FOR ENTRY OF DEFAULT JUDGMENT
AGAINST DEFENDANT ALAN COWHAM**

Pursuant to 28 U.S.C. § 1746, I Paul J. Nicoletti, hereby declare:

1. I am an attorney with the law firm of Nicoletti and Associates, PLLC, attorneys for Plaintiff. Unless otherwise stated, I have personal knowledge of the following facts and, if called and sworn as a witness, could and would competently testify thereto.

2. On March 5, 2013, Plaintiff filed the Complaint in this action. [CM/ECF No. 1].

3. Pursuant to the issuance of third-party subpoenas, Defendant's Internet Service Providers ("ISP") disclosed Defendant's true identity to Plaintiff.

4. On May 29, 2013, Plaintiff filed the Amended Complaint in this action [CM/ECF No. 9].

5. On December 5, 2013, a Clerk's default was entered against Defendant Alan Cowham [CM/ECF No. 23].

6. Defendant has failed to appear, plead or otherwise defend in this action.

7. Defendant is not a minor, incompetent, or in active duty military.

8. Plaintiff has incurred costs in this case in the amount of \$425.00, which includes a statutory filing fee of \$350.00 and process service fees of \$75.00.

9. The reasonable attorneys' fees for prosecuting this case are \$1,182.00, as further detailed below:

10. Date	Description	Hours
03/04/2013	Review Complaint and Exhibits	0.2
04/02/2013	Receipt and review of order allowing early discovery	0.3
11/27/2013	Review of docket and Clerk's Default documents	0.1
02/17/2014	Review of docket and Default Judgment documents	0.3
03/01/2013 -02/17/2014	Case management, managing paralegals and reviewing approximately 10 e-mails; miscellaneous	1.0
Total Hours:		1.9

Attorney billing rate: \$300.00 per hour – 1.9 hrs. x \$300.00 = \$570.00

Date	Description	Hours
03/01/2013	Draft Complaint, prepare for filing, and file	1.1
03/04/2013	Draft Motion for Leave to take early discovery and supporting documents; prepare for filing	0.5
04/02/2013	Prepare and issue subpoena to ISP; calendar and docket response date	0.5
05/20/2013 -09/18/2013	Receipt of Defendant's identity, amend Complaint to name Defendant; prepare summons; coordinate and effectuate service on Defendant	1.2
09/20/2013	Receipt and review affidavit of service; file, docket and calendar Defendant's deadline to answer	0.4
11/26/2013	Prepare Motion and Exhibits for Entry of Clerk's Default	0.3
02/14/2014	Prepare Motion, Memorandum of Points and Authority, Declaration of Attorney and Proposed Judgment for Default Final Judgment	1.1
03/01/2013 -02/17/2014	Case tracking and management; miscellaneous	2.1
Total Hours:		7.2

Paralegal billing rate: \$85.00 per hour – 7.2 hrs. x \$85.00 = \$612.00

Attorney billing rate: \$300.00 per hour – 1.9 hrs. x \$300.00 = \$570.00

TOTAL ATTORNEYS' FEES = \$1,182.00

FURTHER DECLARANT SAYETH NAUGHT.

DECLARATION

PURSUANT TO 28 U.S.C. § 1746, I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 17th day of February, 2014.

PAUL J. NICOLETTI, ESQ.

By: /s/ Paul J. Nicoletti

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MALIBU MEDIA, LLC,

Plaintiff,

v.

Civil Action No. 2:13-cv-05890-JCJ

BRIAN FLANAGAN,

Defendant.

**DECLARATION OF CHRISTOPHER P. FIORE, ESQ. IN
SUPPORT OF MOTION FOR ENTRY OF DEFAULT JUDGMENT
AGAINST DEFENDANT BRIAN FLANAGAN**

Pursuant to 28 U.S.C. § 1746, I, Christopher P. Fiore, hereby declare:

1. I am an attorney with the law firm of Fiore & Barber, LLC, attorneys for Plaintiff.

Unless otherwise stated, I have personal knowledge of the following facts and, if called and sworn as a witness, could and would competently testify thereto.

2. On October 7, 2013, Plaintiff filed the Complaint in this action. [CM/ECF No. 1].

3. Pursuant to the issuance of third-party subpoenas, Defendant's Internet Service Providers ("ISP") disclosed Defendant's true identity to Plaintiff.

4. On March 13, 2014, Plaintiff filed the Amended Complaint in this action [CM/ECF No. 11].

5. On May 22, 2014, a Clerk's default was entered against Defendant Brian Flanagan.

6. Defendant has failed to appear, plead or otherwise defend in this action.

7. Defendant is not a minor, incompetent, or in active duty military.

8. Plaintiff has incurred costs in this case in the amount of \$450.00, which includes a statutory filing fee of \$400.00 and process service fees of \$50.00.

9. The reasonable attorneys' fees for prosecuting this case are \$1,182.00, as further detailed below:

Date	Description	Hours
10/04/2013	Review Complaint and Exhibits	0.2
10/07/2013	Receipt and review of order allowing early discovery	0.3
05/14/2014	Review of docket and Clerk's Default documents	0.1
05/23/2014	Review of docket and Default Judgment documents	0.3
10/04/2013 -05/23/2014	Case management, managing paralegals and reviewing approximately 10 e-mails; miscellaneous	1.0
Total Hours:		1.9

Attorney billing rate: \$300.00 per hour – 1.9 hrs. x \$300.00 = \$570.00

Date	Description	Hours
10/03/2013	Draft Complaint, prepare for filing, and file	1.1
10/04/2013	Draft Motion for Leave to take early discovery and supporting documents; prepare for filing	0.5
10/18/2013	Prepare and issue subpoena to ISP; calendar and docket response date	0.5
12/09/2013 -03/31/2014	Receipt of Defendant's identity, amend Complaint to name Defendant; prepare summons; coordinate and effectuate service on Defendant	1.2
04/01/2014	Receipt and review affidavit of service; file, docket and calendar Defendant's deadline to answer	0.4
05/06/2014	Prepare Motion and Exhibits for Entry of Clerk's Default	0.3
05/23/2014	Prepare Motion, Memorandum of Points and Authority, Declaration of Attorney and Proposed Judgment for Default Final Judgment	1.1
10/03/2013 -05/23/2014	Case tracking and management; miscellaneous	2.1
Total Hours:		7.2

Paralegal billing rate: \$85.00 per hour – 7.2 hrs. x \$85.00 = \$612.00

Attorney billing rate: \$300.00 per hour – 1.9 hrs. x \$300.00 = \$570.00

TOTAL ATTORNEYS' FEES = \$1,182.00

FURTHER DECLARANT SAYETH NAUGHT.

DECLARATION

PURSUANT TO 28 U.S.C. § 1746, I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 27th day of May, 2014.

CHRISTOPHER P. FIORE, ESQ.

By: /s/ Christopher P. Fiore

1 Henrik Mosesi, Esq. (SBN: 189672)
2 433 N. Camden Drive., 6th Floor
3 Beverly Hills, 90210
4 Phone: 310-734-4269
5 Fax: 310-734-4053
6 Email: henry@mosesi.com
7 *Attorneys for Plaintiff*

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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO**

MALIBU MEDIA, LLC,

Plaintiff,

vs.

CHRISTIAN SIANTURI,

Defendant.

Case Number: 1:16-cv-01059-AWI-SKO

**DECLARATION OF HENRIK MOSESI, ESQ. IN SUPPORT OF
MOTION FOR ENTRY OF DEFAULT JUDGMENT
AGAINST DEFENDANT CHRISTIAN SIANTURI**

Pursuant to 28 U.S.C. § 1746, I, Henrik Mosesi, hereby declare:

1. I am an attorney with the law firm of Henrik Mosesi, Esq., attorneys for Plaintiff.

Unless otherwise stated, I have personal knowledge of the following facts and, if called and sworn as a witness, could and would competently testify thereto.

2. On July 24, 2016, Plaintiff filed the Complaint in this action. [CM/ECF No. 1].

3. Pursuant to the issuance of third-party subpoenas, Defendant's Internet Service Providers ("ISP") disclosed Defendant's true identity to Plaintiff.

4. On March 8, 2017, Plaintiff filed the Amended Complaint in this action [CM/ECF No. 18].

5. On April 27, 2017, a Clerk's default was entered against Defendant Christian Sianturi.

6. Defendant has failed to appear, plead or otherwise defend in this action.

7. Defendant is not a minor, incompetent, or in active duty military.

8. Plaintiff has incurred costs in this case in the amount of \$465.00, which includes a statutory filing fee of \$400.00 and process service fees of \$65.00.

9. The reasonable attorneys' fees for prosecuting this case are \$1,182.00, as further detailed below:

Date	Description	Hours
07/22/2016	Review Complaint and Exhibits	0.2
10/25/2016	Receipt and review of order allowing early discovery	0.3
04/26/2017	Review of docket and Clerk's Default documents	0.1
05/24/2017	Review of docket and Default Judgment documents	0.3
07/22/2016	Case management, managing paralegals and reviewing	1.0
-05/24/2017	approximately 10 e-mails; miscellaneous	
Total Hours:		1.9

Attorney billing rate: \$300.00 per hour – 1.9 hrs. x \$300.00 = \$570.00

Date	Description	Hours
07/21/2016	Draft Complaint, prepare for filing, and file	1.1
09/27/2016	Draft Motion for Leave to take early discovery and supporting documents; prepare for filing	0.5
10/25/2016	Prepare and issue subpoena to ISP; calendar and docket response date	0.5
01/12/2017	Receipt of Defendant's identity, amend Complaint to name Defendant; prepare summons; coordinate and effectuate service on Defendant	1.2
03/20/2017	Receipt and review affidavit of service; file, docket and calendar Defendant's deadline to answer	0.4
04/25/2017	Prepare Motion and Exhibits for Entry of Clerk's Default	0.3
05/24/2017	Prepare Motion, Memorandum of Points and Authority, Declaration of Attorney and Proposed Judgment for Default Final Judgment	1.1
07/21/2016	Case tracking and management; miscellaneous	2.1
-05/24/2017		
Total Hours:		7.2

Paralegal billing rate: \$85.00 per hour – 7.2 hrs. x \$85.00 = \$612.00

Attorney billing rate: \$300.00 per hour – 1.9 hrs. x \$300.00 = \$570.00

TOTAL ATTORNEYS' FEES = \$1,182.00

FURTHER DECLARANT SAYETH NAUGHT.

DECLARATION

PURSUANT TO 28 U.S.C. § 1746, I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 25th day of May, 2017.

HENRIK MOSESI, ESQ.

By: /s/ Henrik Mosesi

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
FT. MYERS DIVISION

MALIBU MEDIA, LLC

Plaintiff,

v.

Civil Action No. 2:14-cv-00511-SPC-CM

MARK DANFORD,

Defendant.

**DECLARATION OF M. KEITH LIPSCOMB, ESQ. IN
SUPPORT OF MOTION FOR ENTRY OF DEFAULT JUDGMENT
AGAINST DEFENDANT MARK DANFORD**

Pursuant to 28 U.S.C. § 1746, I, M. Keith Lipscomb, hereby declare:

1. I am an attorney with the law firm of Lipscomb, Eisenberg & Baker, PL, attorneys for Plaintiff. Unless otherwise stated, I have personal knowledge of the following facts and, if called and sworn as a witness, could and would competently testify thereto.

2. On August 29, 2014, Plaintiff filed the Complaint in this action. [CM/ECF No. 1].

3. Pursuant to the issuance of third-party subpoenas, Defendant's Internet Service Providers ("ISP") disclosed Defendant's true identity to Plaintiff.

4. On December 3, 2014, Plaintiff filed the Amended Complaint in this action [CM/ECF No. 10].

5. On February 4, 2015, a Clerk's default was entered against Defendant Mark Danford. [CM/ECF No. 18].

6. Defendant has failed to appear, plead or otherwise defend in this action.

7. Defendant is not a minor, incompetent, or in active duty military.

8. Plaintiff has incurred costs in this case in the amount of \$475.00, which includes a statutory filing fee of \$400.00 and process service fees of \$75.00.

9. The reasonable attorneys' fees for prosecuting this case are \$1,182.00, as further detailed below:

Date	Description	Hours
08/28/2014	Review Complaint and Exhibits	0.2
09/30/2014	Receipt and review of order allowing early discovery	0.3
01/09/2015	Review of docket and Clerk's Default documents	0.1
04/16/2015	Review of docket and Default Judgment documents	0.3
08/28/2014 -04/16/2015	Case management, managing paralegals and reviewing approximately 10 e-mails; miscellaneous	1.0
Total Hours:		1.9

Attorney billing rate: \$300.00 per hour – 1.9 hrs. x \$300.00 = \$570.00

Date	Description	Hours
08/27/2014	Draft Complaint, prepare for filing, and file	1.1
09/18/2014	Draft Motion for Leave to take early discovery and supporting documents; prepare for filing	0.5
09/30/2014	Prepare and issue subpoena to ISP; calendar and docket response date	0.5
11/24/2014 -12/15/2014	Receipt of Defendant's identity, amend Complaint to name Defendant; prepare summons; coordinate and effectuate service on Defendant	1.2
12/17/2014	Receipt and review affidavit of service; file, docket and calendar Defendant's deadline to answer	0.4
01/08/2015	Prepare Motion and Exhibits for Entry of Clerk's Default	0.3
04/15/2015	Prepare Motion, Memorandum of Points and Authority, Declaration of Attorney and Proposed Judgment for Default Final Judgment	1.1
08/27/2014 -04/15/2015	Case tracking and management; miscellaneous	2.1
Total Hours:		7.2

Paralegal billing rate: \$85.00 per hour – 7.2 hrs. x \$85.00 = \$612.00

Attorney billing rate: \$300.00 per hour – 1.9 hrs. x \$300.00 = \$570.00

TOTAL ATTORNEYS' FEES = \$1,182.00

FURTHER DECLARANT SAYETH NAUGHT.

DECLARATION

PURSUANT TO 28 U.S.C. § 1746, I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 22nd day of April, 2015.

M. KEITH LIPSCOMB, ESQ.

By: /s/ M. Keith Lipscomb

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

MALIBU MEDIA, LLC,

Plaintiff,

v.

Civil Action No. 1:15-cv-01211-CCC

ROBERT POWELL,

Defendant.

**DECLARATION OF CHRISTOPHER P. FIORE, ESQ. IN
SUPPORT OF MOTION FOR ENTRY OF DEFAULT JUDGMENT
AGAINST DEFENDANT ROBERT POWELL**

Pursuant to 28 U.S.C. § 1746, I, Christopher P. Fiore, hereby declare:

1. I am an attorney with the law firm of Fiore & Barber, LLC, attorneys for Plaintiff.

Unless otherwise stated, I have personal knowledge of the following facts and, if called and sworn as a witness, could and would competently testify thereto.

2. On June 19, 2015, Plaintiff filed the Complaint in this action. [CM/ECF No. 1].

3. Pursuant to the issuance of third-party subpoenas, Defendant's Internet Service Providers ("ISP") disclosed Defendant's true identity to Plaintiff.

4. On September 18, 2015, Plaintiff filed its Amended Complaint in this action [CM/ECF No. 8].

5. On November 4, 2015, a Clerk's default was entered against Defendant Robert Powell. [CM/ECF No. 14].

6. Defendant has failed to appear, plead or otherwise defend in this action.

7. Defendant is not a minor, incompetent, or in active duty military.

8. Plaintiff has incurred costs in this case in the amount of \$465.00, which includes a statutory filing fee of \$400.00 and process service fees of \$65.00.

9. The reasonable attorneys' fees for prosecuting this case are \$1,182.00, as further detailed below:

Date	Description	Hours
06/19/2015	Review Complaint and Exhibits	0.2
06/24/2015	Receipt and review of order allowing early discovery	0.3
11/03/2015	Review of docket and Clerk's Default documents	0.1
12/03/2015	Review of docket and Default Judgment documents	0.3
06/19/2015 -12/03/2015	Case management, managing paralegals and reviewing approximately 10 e-mails; miscellaneous	1.0
Total Hours:		1.9

Attorney billing rate: \$300.00 per hour – 1.9 hrs. x \$300.00 = \$570.00

Date	Description	Hours
06/18/2015	Draft Complaint, prepare for filing, and file	1.1
06/22/2015	Draft Motion for Leave to take early discovery and supporting documents; prepare for filing	0.5
06/25/2015	Prepare and issue subpoena to ISP; calendar and docket response date	0.5
08/25/2015 -10/08/2015	Receipt of Defendant's identity, amend Complaint to name Defendant; prepare summons; coordinate and effectuate service on Defendant	1.2
10/10/2015	Receipt and review affidavit of service; file, docket and calendar Defendant's deadline to answer	0.4
11/02/2015	Prepare Motion and Exhibits for Entry of Clerk's Default	0.3
12/02/2015	Prepare Motion, Memorandum of Points and Authority, Declaration of Attorney and Proposed Judgment for Default Final Judgment	1.1
06/18/2015 -12/02/2015	Case tracking and management; miscellaneous	2.1
Total Hours:		7.2

Paralegal billing rate: \$85.00 per hour – 7.2 hrs. x \$85.00 = \$612.00

Attorney billing rate: \$300.00 per hour – 1.9 hrs. x \$300.00 = \$570.00

TOTAL ATTORNEYS' FEES = \$1,182.00

FURTHER DECLARANT SAYETH NAUGHT.

DECLARATION

PURSUANT TO 28 U.S.C. § 1746, I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 8 day of December, 2015

CHRISTOPHER P. FIORE, ESQ.

By: /s/ Christopher P. Fiore

Patrick J. Cerillo, Esq.
Patrick J. Cerillo, LLC
4 Walter Foran Blvd., Suite 402
Flemington, NJ 08822
Attorney ID No. 01481-1980
T: (908) 284-0997
F: (908) 284-0915
pjcerillolaw@comcast.net
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

MALIBU MEDIA, LLC,

Plaintiff,

v.

Civil Action No. 2:15-cv-02250-KM-MAHF

ZENON NOWOBILSKI,

Defendant.

**DECLARATION OF PATRICK J. CERILLO, ESQ. IN
SUPPORT OF MOTION FOR ENTRY OF DEFAULT JUDGMENT
AGAINST DEFENDANT ZENON NOWOBILSKI**

Pursuant to 28 U.S.C. § 1746, I, Patrick J. Cerillo, hereby declare:

1. I am an attorney with the law firm of Patrick J. Cerillo, LLC, attorneys for Plaintiff. Unless otherwise stated, I have personal knowledge of the following facts and, if called and sworn as a witness, could and would competently testify thereto.

2. On March 31, 2015, Plaintiff filed the Complaint in this action. [CM/ECF No. 1].

3. Pursuant to the issuance of third-party subpoenas, Defendant's Internet Service Providers ("ISP") disclosed Defendant's true identity to Plaintiff.

4. On October 15, 2015, Plaintiff filed the Amended Complaint in this action [CM/ECF No. 9].

5. On December 3, 2015, a Clerk's default was entered against Defendant Zenon Nowobilski [CM/ECF No. 14].

6. Defendant has failed to appear, plead or otherwise defend in this action.

7. Defendant is not a minor, incompetent, or in active duty military.

8. Plaintiff has incurred costs in this case in the amount of \$475.00, which includes a statutory filing fee of \$400.00 and process service fees of \$75.00.

9. The reasonable attorneys' fees for prosecuting this case are \$1,182.00, as further detailed below:

Date	Description	Hours
03/31/2015	Review Complaint and Exhibits	0.2
07/23/2015	Receipt and review of order allowing early discovery	0.3
12/03/2015	Review of docket and Clerk's Default documents	0.1
12/08/2015	Review of docket and Default Judgment documents	0.3
03/31/2015 -12/08/2015	Case management, managing paralegals and reviewing approximately 10 e-mails; miscellaneous	1.0
Total Hours:		1.9

Attorney billing rate: \$300.00 per hour – 1.9 hrs. x \$300.00 = \$570.00

Date	Description	Hours
03/30/2015	Draft Complaint, prepare for filing, and file	1.1
04/15/2015	Draft Motion for Leave to take early discovery and supporting documents; prepare for filing	0.5
07/23/2015	Prepare and issue subpoena to ISP; calendar and docket response date	0.5
09/23/2015 -10/22/2015	Receipt of Defendant's identity, amend Complaint to name Defendant; prepare summons; coordinate and effectuate service on Defendant	1.2
10/26/2015	Receipt and review affidavit of service; file, docket and calendar Defendant's deadline to answer	0.4
12/02/2015	Prepare Motion and Exhibits for Entry of Clerk's Default	0.3
12/07/2015	Prepare Motion, Memorandum of Points and Authority, Declaration of Attorney and Proposed Judgment for Default Final Judgment	1.1
03/30/2015 -12/07/2015	Case tracking and management; miscellaneous	2.1
Total Hours:		7.2

Paralegal billing rate: \$85.00 per hour – 7.2 hrs. x \$85.00 = \$612.00

Attorney billing rate: \$300.00 per hour – 1.9 hrs. x \$300.00 = \$570.00

TOTAL ATTORNEYS' FEES = \$1,182.00

FURTHER DECLARANT SAYETH NAUGHT.

DECLARATION

PURSUANT TO 28 U.S.C. § 1746, I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 14th day of December, 2015.

PATRICK J. CERILLO, ESQ.

By: /s/ Patrick J. Cerillo