

# **ATTACHMENT A**

caption  
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Against Defendant

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3. Malibu Media v. [Redacted] – Civ. Ac. No. 8:14-cv-03950-DKC
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A



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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



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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*



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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*



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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



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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.

**YOUSEF M. FARONIYA, ESQ.**

By: /s/ Yousef M. Faroniya



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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

[REDACTED],  
Defendant.

/

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

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 [REDACTED] [REDACTED]. [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 -02/16/2015	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
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.

**YOUSEF M. FARONIYA, ESQ.**

By: /s/ Yousef M. Faroniya



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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

[REDACTED],

Defendant.

/

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

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 [REDACTED] [REDACTED]. [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.

**YOUSEF M. FARONIYA, ESQ.**

By: /s/ Yousef M. Faroniya



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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 19<sup>th</sup> 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.

USDC IN/ND case 3:13-cv-00162-PPS-CAN document 24-1 filed 02/17/14 page 2 of 3

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.**

USDC IN/ND case 3:13-cv-00162-PPS-CAN document 24-1 filed 02/17/14 page 3 of 3

**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

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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*

5 **UNITED STATES DISTRICT COURT**  
6 **EASTERN DISTRICT OF CALIFORNIA**  
7 **FRESNO**

8 MALIBU MEDIA, LLC, Case Number: 1:16-cv-01059-AWI-SKO  
9 Plaintiff,  
10 vs.  
11 CHRISTIAN SIANTURI,  
12 Defendant.

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14 **DECLARATION OF HENRIK MOESI, ESQ. IN SUPPORT OF**  
15 **MOTION FOR ENTRY OF DEFAULT JUDGMENT**  
16 **AGAINST DEFENDANT CHRISTIAN SIANTURI**

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

18 1. I am an attorney with the law firm of Henrik Mosesi, Esq., attorneys for Plaintiff.  
19 Unless otherwise stated, I have personal knowledge of the following facts and, if called and  
20 sworn as a witness, could and would competently testify thereto.

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

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

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

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

Case 1:16-cv-01059-AWI-SKO Document 28-2 Filed 05/25/17 Page 2 of 3

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

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

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

5       9.     The reasonable attorneys' fees for prosecuting this case are \$1,182.00, as further  
6 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 -05/24/2017	Case management, managing paralegals and reviewing approximately 10 e-mails; miscellaneous	1.0
Total Hours:		1.9

13       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	1.2
-03/18/2017	Defendant; prepare summons; coordinate and effectuate service on Defendant	
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 -05/24/2017	Case tracking and management; miscellaneous	2.1
Total Hours:		7.2

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

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

27       TOTAL ATTORNEYS' FEES = \$1,182.00

28       **FURTHER DECLARANT SAYETH NAUGHT.**

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**DECLARATION**

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**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.

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Executed on this 25<sup>th</sup> day of May, 2017.

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**HENRIK MOSESI, ESQ.**

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By: /s/ Henrik Mosesi

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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.

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**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 22<sup>nd</sup> day of April, 2015.

**M. KEITH LIPSCOMB, ESQ.**

By: /s/ *M. Keith Lipscomb*



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**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.

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**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

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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](mailto:pjcerillolaw@comcast.net)  
*Attorneys for Plaintiff*

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**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.

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**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