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11 *Attorneys for Plaintiff John Blaha,*
12 *Individually and on Behalf of Others Similarly Situated*

13
14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**

16 John Blaha, * individually and on behalf of
17 others similarly situated,
18 Plaintiff,

19 v.

20 Rightscorp, Inc., a Nevada corporation,
f/k/a Stevia Agritech Corp.; Rightscorp,
21 Inc., a Delaware corporation; Christopher
Sabec; Robert Steele; Craig Harmon;
22 Dennis J. Hawk; BMG Rights
23 Management (US) LLC; Warner Bros.
24 Entertainment Inc.; and John Does 1 to 10,
25 Defendants.

26 [*Previously captioned with Karen J. Reif*
27 *and Isaac Nesmith as lead plaintiffs*]

Case No.: 2:14-cv-9032-DSF-(JCGx)

Assigned to: Hon. Dale S. Fischer
United States District Judge

Referred to: Hon. Jay C. Gandhi
United States Magistrate Judge

**REQUEST FOR JUDICIAL
NOTICE IN SUPPORT OF (1)
PLAINTIFF’S OPPOSITION TO
DEFENDANTS’ MOTION TO
STRIKE SECOND CAUSE OF
ACTION AND MOTION TO
DISMISS; AND (2) PLAINTIFF’S
OPPOSITION TO DEFENDANT
HARMON’S MOTION TO DISMISS**

**[Opposition To Motion To Dismiss,
etc. filed concurrently herewith]**

DATE: May 11, 2015
TIME: 8:30 a.m.
COURTROOM: 840

Complaint Filed: November 21, 2014
Trial Date: Not yet set

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7 Plaintiff John Blaha, individually and on behalf of others similarly situated, by
8 and through his attorneys, hereby request the Court to take judicial notice pursuant
9 to Federal Rule of Evidence 201 of the following:

10 (1) The docket report from *In re Subpoena to Telscape Communications,*
11 *Inc.*, Case. No. 2:12-mc-00317-UA (C.D. Cal.), Declaration of Morgan E. Pietz
12 Regarding Authentication of Exhibits Subject to Request for Judicial Notice (“Pietz
13 Dec.”), Exhibit (“Exh.”), A, p. 2.

14 (2) The Declaration of Dennis Hawk, *In re Subpoena to Telscape*
15 *Communications, Inc.*, Case. No. 2:12-mc-00317-UA (C.D. Cal.), Pietz Dec., Exh.
16 A, p. 4.

17 (3) The DMCA Subpoena to Telscape Communications, Inc. , *In re*
18 *Subpoena to Telscape Communications, Inc.*, Case. No. 2:12-mc-00317-UA (C.D.
19 Cal.), Pietz Dec., Exh. A, p. 5.

20 (4) The docket report from *Telscape Communications, Inc. v. Rightscorp.,*
21 *Inc.*, Case No. 2:12-cv-08833-DSF-JCG (C.D.Cal.), Pietz Dec., Exh. B, p. 2.

22 (5) Telscape Communications, Inc.’s Motion to Quash or Modify
23 Subpoena, *Telscape Communications, Inc. v. Rightscorp., Inc.*, Case No. 2:12-cv-
24 08833-DSF-JCG (C.D.Cal.), Pietz Dec., Exh. B, p. 5.

25 (6) The Declaration of Sherri Flatt, *Telscape Communications, Inc. v.*
26 *Rightscorp., Inc.*, Case No. 2:12-cv-08833-DSF-JCG (C.D.Cal.), Pietz Dec., Exh. B,
27 p. 13.
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1 (7) The Declaration of Michelle Wells, *Telscape Communications, Inc. v.*
2 *Rightscorp., Inc.*, Case No. 2:12-cv-08833-DSF-JCG (C.D.Cal.), Pietz Dec., Exh. B,
3 p. 15.

4 (8) The Declaration of Gary Hamlett, *Telscape Communications, Inc. v.*
5 *Rightscorp., Inc.*, Case No. 2:12-cv-08833-DSF-JCG (C.D.Cal.), Pietz Dec., Exh. B,
6 p. 36.

7 (9) Notice of Non-Opposition, *Telscape Communications, Inc. v.*
8 *Rightscorp., Inc.*, Case No. 2:12-cv-08833-DSF-JCG (C.D.Cal.), Pietz Dec., Exh. B,
9 p. 38.

10 (10) Order Granting Motion to Quash, *Telscape Communications, Inc. v.*
11 *Rightscorp., Inc.*, Case No. 2:12-cv-08833-DSF-JCG (C.D.Cal.), Pietz Dec., Exh. B,
12 p. 40.

13 (11) The docket report from *In re IMON Communications LCC*, Case No.
14 2:14-mc-00277-UA (C.D. Cal.), Pietz Dec., Exh. C, p. 2.

15 (12) The Declaration of Dennis Hawk, *In re IMON Communications LCC*,
16 Case No. 2:14-mc-00277-UA (C.D. Cal.), Pietz Dec., Exh. C, p. 4.

17 (13) Notice of Lodging of Summary Spreadsheet and DMCA Notifications,
18 *In re IMON Communications LCC*, Case No. 2:14-mc-00277-UA (C.D. Cal.), Pietz
19 Dec., Exh. C, p. 5.

20 (14) DMCA Subpoena to IMON Communications, *In re IMON*
21 *Communications LCC*, Case No. 2:14-mc-00277-UA (C.D. Cal.), Pietz Dec., Exh.
22 C, p. 7.

23 (15) The docket report from *In re Subpoena to Grande Communications*
24 *Network, LLC*, Case No. 2:14-mc-00627-UA (C.D. Cal.), Pietz Dec., Exh. D, p. 2.

25 (16) The Declaration of Dennis Hawk, *In re Subpoena to Grande*
26 *Communications Network, LLC*, Case No. 2:14-mc-00627-UA (C.D. Cal.), Pietz
27

1 Dec., Exh. D, p. 4.

2 (17) Notice of Lodging of Summary Spreadsheet and DMCA Notifications,
3 *In re Subpoena to Grande Communications Network, LLC*, Case No. 2:14-mc-
4 00627-UA (C.D. Cal.), Pietz Dec., Exh. D, p. 5.

5 (18) DMCA Subpoena to Grande Communications Network, LLC, *In re*
6 *Subpoena to Grande Communications Network, LLC*, Case No. 2:14-mc-00627-UA
7 (C.D. Cal.), Pietz Dec., Exh. D, p. 7.

8 (19) The docket report from *In re Subpoena to Greenfield Communications,*
9 *Inc.* Case No. 2:14-mc-00635-UA (C.D.Cal.), Pietz Dec., Exh. E, p. 2.

10 (20) The Declaration of Dennis Hawk, *In re Subpoena to Greenfield*
11 *Communications, Inc.* Case No. 2:14-mc-00635-UA (C.D.Cal.), Pietz Dec., Exh. E,
12 p. 4.

13 (21) Notice of Lodging of Summary Spreadsheet and DMCA Notifications,
14 *In re Subpoena to Greenfield Communications, Inc.* Case No. 2:14-mc-00635-UA
15 (C.D.Cal.), Pietz Dec., Exh. E, p. 5.

16 (22) DMCA Subpoena to Greenfield Communications, Inc., *In re Subpoena*
17 *to Greenfield Communications, Inc.* Case No. 2:14-mc-00635-UA (C.D.Cal.), Pietz
18 Dec., Exh. E, p. 7.

19 (23) The docket report from *Grande Communications Network, LLC. v.*
20 *Rightscorp, Inc.*, Case No.1:14-mc-00848-LY (W.D. Tex.), Pietz Dec., Exh. F, p. 2.

21 (24) Grande Communications Network, LLC's Motion to Quash, *Grande*
22 *Communications Network, LLC. v. Rightscorp, Inc.*, Case No.1:14-mc-00848-LY
23 (W.D. Tex.), Pietz Dec., Exh. F, p. 4.

24 (25) Order Referring Motion to Magistrate Judge, *Grande Communications*
25 *Network, LLC. v. Rightscorp, Inc.*, Case No.1:14-mc-00848-LY (W.D. Tex.), Pietz
26 Dec., Exh. F, p. 89.
27

1 (26) Advisory to the Court Regarding Withdrawal of Subpoena, *Grande*
2 *Communications Network, LLC. v. Rightscorp, Inc.*, Case No.1:14-mc-00848-LY
3 (W.D. Tex.), Pietz Dec., Exh. F, p. 90.

4 (27) Order Closing Case, *Grande Communications Network, LLC. v.*
5 *Rightscorp, Inc.*, Case No.1:14-mc-00848-LY (W.D. Tex.), Pietz Dec., Exh. F, p.
6 97.

7 (28) The docket report from *In re Subpoena to Birch Communications, Inc.*,
8 Case No 2:14-mc-00671-UA (C.D. Cal.), Pietz Dec., Exh. G, p. 2.

9 (29) The Declaration of Dennis Hawk, *In re Subpoena to Birch*
10 *Communications, Inc.*, Case No 2:14-mc-00671-UA (C.D. Cal.), Pietz Dec., Exh. G,
11 p. 4.

12 (30) Notice of Lodging of Summary Spreadsheet and DMCA Notifications,
13 *In re Subpoena to Birch Communications, Inc.*, Case No 2:14-mc-00671-UA (C.D.
14 Cal.), Pietz Dec., Exh. G, p. 5.

15 (31) DMCA Subpoena to Birch Communications, Inc., *In re Subpoena to*
16 *Birch Communications, Inc.*, Case No 2:14-mc-00671-UA (C.D. Cal.), Pietz Dec.,
17 Exh. G, p. 7.

18 (32) The docket report from *In re Subpoena to Elijay Telephone Co.*, Case
19 No. 2:14-mc-00861-UA (C.D. Cal.), Pietz Dec., Exh. H, p. 2.

20 (33) The Declaration of Dennis Hawk, *In re Subpoena to Elijay Telephone*
21 *Co.*, Case No. 2:14-mc-00861-UA (C.D. Cal.), Pietz Dec., Exh. H, p. 4.

22 (34) Notice of Lodging of Summary Spreadsheet, *In re Subpoena to Elijay*
23 *Telephone Co.*, Case No. 2:14-mc-00861-UA (C.D. Cal.), Pietz Dec., Exh. H, p. 5.

24 (35) DMCA Subpoena to Elijay Telephone Co., *In re Subpoena to Elijay*
25 *Telephone Co.*, Case No. 2:14-mc-00861-UA (C.D. Cal.), Pietz Dec., Exh. H, p. 7.

26 (36) The docket report from *In re Subpoena Issued to Birch*
27
28

1 *Communications, Inc. f/k/a CBeyond Communications LLC*, Case No. 1:14-cv-
2 03904-WSD (N.D. Ga.), Pietz Dec., Exh. I, p. 2.

3 (37) Excerpts of Birch Communications, Inc.’s Motion to Quash, *In re*
4 *Subpoena Issued to Birch Communications, Inc. f/k/a CBeyond Communications*
5 *LLC*, Case No. 1:14-cv-03904-WSD (N.D. Ga.), Pietz Dec., Exh. I, p. 4.

6 (38) Rightscorp, Inc.’s Response to Motion to Quash, *In re Subpoena Issued*
7 *to Birch Communications, Inc. f/k/a CBeyond Communications LLC*, Case No. 1:14-
8 cv-03904-WSD (N.D. Ga.), Pietz Dec., Exh. I, p. 78.

9 (39) Birch Communications, Inc.’s Reply, *In re Subpoena Issued to Birch*
10 *Communications, Inc. f/k/a CBeyond Communications LLC*, Case No. 1:14-cv-
11 03904-WSD (N.D. Ga.), Pietz Dec., Exh. I, p. 105.

12 (40) The Declaration of Anton Zouplna In Support of Reply, *In re Subpoena*
13 *Issued to Birch Communications, Inc. f/k/a CBeyond Communications LLC*, Case
14 No. 1:14-cv-03904-WSD (N.D. Ga.), Pietz Dec., Exh. I, p.122.

15 (41) Rightscorp’s Motion for Leave to File Surreply, *In re Subpoena Issued*
16 *to Birch Communications, Inc. f/k/a CBeyond Communications LLC*, Case No. 1:14-
17 cv-03904-WSD (N.D. Ga.), Pietz Dec., Exh. I, p.124.

18 (42) Declaration of Robert Steele, *In re Subpoena Issued to Birch*
19 *Communications, Inc. f/k/a CBeyond Communications LLC*, Case No. 1:14-cv-
20 03904-WSD (N.D. Ga.), Pietz Dec., Exh. I, p.131.

21 (43) Order Granting Motion to Quash, *In re Subpoena Issued to Birch*
22 *Communications, Inc. f/k/a CBeyond Communications LLC*, Case No. 1:14-cv-
23 03904-WSD (N.D. Ga.), Pietz Dec., Exh. I, p.136.

24 (44) The docket report from *In re Subpoena Issued to Elijay Telephone Co.*,
25 Case No. 2:14-mi-0004-WCO (N.D. Ga.), Pietz Dec., Exh. J, p. 2.

26 (45) Elijay Telephone, Co.’s Motion to Quash, *In re Subpoena Issued to*
27

1 *Elijay Telephone Co.*, Case No. 2:14-mi-0004-WCO (N.D. Ga.), Pietz Dec., Exh. J,
2 p. 5.

3 (46) Consent Motion to Withdraw Subpoena and Withdraw Motions to
4 Quash and for Sanctions, *In re Subpoena Issued to Elijay Telephone Co.*, Case No.
5 2:14-mi-0004-WCO (N.D. Ga.), Pietz Dec., Exh. J, p. 35.

6 (47) Order Dismissing Case, *In re Subpoena Issued to Elijay Telephone Co.*,
7 Case No. 2:14-mi-0004-WCO (N.D. Ga.), Pietz Dec., Exh. J, p. 41.

8 (48) The docket report from *In re Subpoena to Hiawatha Broadband*
9 *Communications, Inc.*, Case No. 2:14-mc-1006-UA (C.D.Cal.), Pietz Dec., Exh. K,
10 p. 2.

11 (49) The Declaration of Dennis Hawk, *In re Subpoena to Hiawatha*
12 *Broadband Communications, Inc.*, Case No. 2:14-mc-1006-UA (C.D.Cal.), Pietz
13 Dec., Exh. K, p. 4.

14 (50) Notice of Lodging of Summary Spreadsheet, *In re Subpoena to*
15 *Hiawatha Broadband Communications, Inc.*, Case No. 2:14-mc-1006-UA
16 (C.D.Cal.), Pietz Dec., Exh. K, p. 5.

17 (51) DMCA Subpoena to Hiawatha Broadband Communications, Inc., Pietz
18 Dec., Exh. K, p. 7.

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1 (52) April 28, 2014 “Form 8-K (Current report filing),” filed by Defendant
2 Rightscorp, Inc. for the period ending April 25, 2014, (downloaded from the official
3 S.E.C. website, EDGAR.com), Pietz Dec., Exh. L.
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5 DATED: April 13, 2015
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7 THE PIETZ LAW FIRM

8 /s/ Morgan E. Pietz

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17 *individually and on behalf of others similarly situated*
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