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3	El Segundo, California 90245 Telephone: (310) 416-1300 Facsimile: (310) 416-1310 e-mail: awaxler@wcb-law.com		
5	e-mail: wpark@wcb-law.com		
6 7	Specially Appearing for Respondent BRETT L. GIBBS		
8	UNITED STATES	S I	DISTRICT COURT
9	CENTRAL DISTRI	[C	Γ OF CALIFORNIA
10			
11	INGENUITY 13 LLC,		Case No. 2:12-CV-8333-ODW (JCx) [Consolidated with Case Nos.: 2:12-cv-6636; 2:12-cv-6669; 2:12-cv-6662; 2:12-cv-6668]
12	Plaintiff,		
13	vs.		[Assigned to Judge Otis D. Wright, II]
14	JOHN DOE,	{	SUPPLEMENTAL DECLARATION OF BRETT L. GIBBS IN SUPPORT OF SUPPLEMENTAL BRIEF IN RESPONSE TO THE COURT'S FEBRUARY 7, 2013 OSC
15 16	Defendant.	_}	
17			[Complaint Filed: September 27, 2012]
18			Date: March 11, 2013
19			Time: 1:30 p.m. Dept: 11
20			[Filed Concurrently with Brett Gibbs' Supplemental Brief; Supplemental Request for Judicial Notice; Objections to Evidence and Proposed Order re Objections to Evidence]
22			to Evidence and Proposed Order re
23			
24			Trial date: None set
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SUPPLEMENTAL DECLARATION OF BRETT L. GIBBS

I, Brett L. Gibbs, declare and state as follows:

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- 3 1. I am an attorney at law duly licensed to practice before all of the courts in the State of California and the United States District Court for the Central District 4 of California. I was "Of Counsel" to Prenda Law, Inc., counsel of record for 5 Plaintiffs AF Holdings, LLC ("AF Holdings") and Ingenuity 13, LLC ("Ingenuity") 6 in the actions entitled AF Holdings, Inc. v. Doe, United States District Court for the 7 Central District of California Case No. 2:12-cv-6636-ODW(JCx) ("Case No. 8 6636"), AF Holdings, Inc. v. Doe, United States District Court for the Central 9 District of California Case No. 2:12-cv-6669-ODW(JCx) ("Case No. 6669"), 10 Ingenuity 13 LLC v. Doe, United States District Court for the Central District of 11 California Case No. 2:12-cv-6662-ODW(JCx) ("Case No. 6662"), Ingenuity 13 LLC 12 v. Doe, United States District Court for the Central District of California Case No. 13 2:12-cv-6668-ODW(JCx) ("Case No. 6668") and Ingenuity 13 LLC v. Doe, United 14 States District Court for the Central District of California Case No. 2:12-cv-8333-15 ODW(JCx) ("Case No. 8333" and collectively the "Copyright Litigations"). I have 16 personal knowledge of the facts set forth below and I could and would competently 17 18 testify to them if called upon to do so.
 - 2. I make this declaration in support of Brett L. Gibbs' Supplemental Brief in response to the Court's February 7, 2013 OSC.
 - 3. I no longer have a relationship with Prenda Law, Inc. or Livewire Holdings, LLC. I am also no longer counsel of record for any cases involving Ingenuity and am only counsel of record in one case for AF Holdings pending AF Holdings retaining new counsel.
 - 4. I first became aware of the allegation that counsel for SBC Internet Services, LLC dba AT&T Internet Services ("AT&T") claimed that a Prenda employee named Angela Van Den Hemel contacted counsel for AT&T regarding the status of a subpoena issued to AT&T in the case entitled *AF Holdings LLC v*.

1 Doe, United States District Court for the Central District of California Case No. 12cv-005075 after the Court issued its October 19, 2012 order vacating the prior early discovery orders when I reviewed the declarations of Bart Huffman and Camille D. 3 Kerr filed by Mr. Pietz on February 20, 2013. I did not instruct Ms. Van Den Hemel 4 5 to follow-up with AT&T's counsel regarding the status of the subpoena after the Court issued its October 19, 2012 order. In addition, I was not aware of any attempt to follow-up regarding the status of the subpoena until I reviewed Mr. Huffman and 7 Ms. Kerr's declarations. I specifically advised members of Prenda about the Court's October 19, 2012 orders vacating the prior early discovery orders and advised them 10 not to attempt to enforce the subpoenas. 11 5. I have never met Salt Marsh or had any direct contact with Salt Marsh. 12 I have never forged the signature of "Salt Marsh." I have also never met Alan 13 Moody, Alan Moay, Alan Mony, or Allan Mooney. I have also never had any direct contact with Alan Moody, Alan Mooy, Alan Mony, or Allan Mooney. I have never 14 forged the signature of "Alan Moody", "Alan Moay", "Alan Mony", or "Allan 15 16 Mooney."

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct. This declaration is executed on the 4th day of March 2013, in Mill Valley, California.

BRETT L. GIBBS

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