

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

-----X	:	
MALIBU MEDIA, LLC,	:	
Plaintiff,	:	Civil Action No. <u>2012-2078</u>
vs.	:	Consolidated from Cases:
	:	2:12-cv-02078-MMB
JOHN DOES 1, 6, 13, 14, and 16,	:	2:12-cv-02084-MMB
Defendants.	:	5:12-cv-02088-MMB
-----X	:	

**PLAINTIFF’S REQUEST TO PRODUCE DOCUMENTS AND TANGIBLE THINGS, OR TO ENTER ONTO LAND UNDER RULE 34**

Plaintiff, Malibu Media, LLC (“Plaintiff”) by and through undersigned counsel hereby requests that Defendant, John Doe 16 (“Defendant”):

(1) Permit Plaintiff to enter onto the following land to inspect, photograph, test, or sample the property or an object or operation on the property pursuant to Fed. R. Civ. P. 34(a)(2):

(a) Plaintiff will enter onto the premises of [**ADDRESS DELETED IN THIS COPY TO PRESERVE DEFENDANT’S PRIVACY**], for the purpose of: (1) making forensic copies of each of Defendant’s computers’ hard drives; (2) connecting to the internet to ascertain Defendant’s IP address; and (3) inspecting Defendant’s modem, new wireless router, and old wireless router.

(b) Such entry will be made on at a time to be agreed upon on or before **May 8, 2013 at 10:00 am.**

Dated: May 2, 2013

Respectfully submitted,

By: /s/ M. Keith Lipscomb  
M. Keith Lipscomb (429554)  
klipsomb@lebfirm.com  
LIPSCOMB, EISENBERG & BAKER, PL  
2 South Biscayne Blvd.  
Penthouse 3800  
Miami, FL 33131  
Telephone: (786) 431-2228  
Facsimile: (786) 431-2229  
*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 2, 2013, a true and correct copy of the foregoing document was served via courier and/or email to the following:

**SERVICE LIST**

Ronald A. Smith, Esq.  
Ronald A. Smith & Associates  
1617 JFK Boulevard  
Suite 1240  
Philadelphia, PA 19103  
Email: ronaldasmithesq@aol.com  
*Attorneys for John Doe 16*

By: /s/ M. Keith Lipscomb