

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

UMG Recordings, Inc., *et al.*,

*Plaintiffs,*

*vs.*

Janne Lanzoni,

*Defendant.*

Case No. 4:08-cv-3-25

**DEFENDANT'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS  
AND THINGS TO PLAINTIFF SONY BMG MUSIC ENTERTAINMENT**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Defendant Janne Lanzoni requests that Plaintiffs in the above-styled action produce the documents and things described in the requests set forth below.

**DEFINITIONS AND INSTRUCTIONS**

The Definitions and Instructions in Plaintiffs' First Set of Requests for Production of Documents, served upon Defendant Lanzoni on or about February 3, 2009, in this action, are incorporated herein by reference, with the exception that the terms "YOU" and "YOUR" are defined to mean Plaintiffs UMG Recordings, Inc.; BMG Music; Sony BMG Music Entertainment; Warner Brothers Records Inc.; and Atlantic Recording Corporation, further including the Recording Industry Association of America, and also anyone acting under the direction of any of them, including MediaSentry, Inc. Although Defendant Lanzoni may find some of the definitions and instructions objectionable, Defendant trusts that Plaintiffs will not object to following their own set of definitions and instructions to the letter. Under Rule 26(g)(2) of the Federal Rules of Civil Procedure, Plaintiffs' counsel's signature upon the

discovery requests served upon Defendant Lanzoni was a certification that the definitions and instructions drafted by Plaintiffs' counsel were not unreasonable or unduly burdensome or expensive, given the needs of the case, the discovery already had in the case, the amount in controversy, and the importance of the issues at stake in the litigation. Please pay particular attention to your definitions and instructions concerning any document withheld on a claim of privilege or work product, and any documents that have been discarded, destroyed, or deleted. Please follow your own instructions to the letter.

### **DOCUMENTS AND THINGS TO BE PRODUCED**

1. All Certificates of Copyright Registration for each copyrighted work that Defendant Lanzoni is alleged to have committed any act of copyright infringement, including but not limited to each of the copyrighted sound recordings on Exhibit A to Plaintiff's Complaint for Copyright Infringement.
2. The deposit copy of the copyrighted work that was filed with the Register of Copyrights for each application for registration of each copyright that Defendant Lanzoni is alleged to have infringed, including but not limited to each of the copyrighted sound recordings on Exhibit A to Plaintiff's Complaint for Copyright Infringement.
3. All DOCUMENTS CONCERNING the registration, renewal, or transfer or licensing of the copyrights that Defendant Lanzoni is alleged to have infringed.
4. All DOCUMENTS CONCERNING the ownership of the copyrights that Defendant Lanzoni is alleged to have infringed.
5. All DOCUMENTS CONCERNING any licensing to any third party of the copyrights that Defendant Lanzoni is alleged to have infringed.

6. All DOCUMENTS CONCERNING YOUR file for Case ID# 119153302, including all DOCUMENTS in the possession, custody or control of MediaSentry, Inc., and any other investigator who has worked, directly or indirectly, for YOU.
7. All DOCUMENTS CONCERNING Janne Lanzoni, including all DOCUMENTS in the possession, custody or control of MediaSentry, Inc., and any other investigator who has worked, directly or indirectly, for YOU.
8. All DOCUMENTS CONCERNING any PERSON who has ever at any time used IP address 70.232.28.96, including all DOCUMENTS in the possession, custody or control of MediaSentry, Inc., and any other investigator who has worked, directly or indirectly, for YOU.
9. All DOCUMENTS CONCERNING any PERSON who has ever at any time used the screen name "Diverse\_Entertainmen", including all DOCUMENTS in the possession, custody or control of MediaSentry, Inc., and any other investigator who has worked, directly or indirectly, for YOU.
10. All DOCUMENTS CONCERNING all acts of copyright infringement that are the subject of Plaintiff's Complaint for Copyright Infringement.
11. All DOCUMENTS CONCERNING any "Doe" lawsuit filed against any PERSON who used IP address 70.232.28.96.
12. All deposition transcripts and deposition exhibits in which MediaSentry, Inc., or any representative or employee of MediaSentry, Inc., was deposed.
13. All affidavits, declarations, statements, and expert reports by MediaSentry, Inc., or any representative or employee of MediaSentry, Inc.

14. All deposition transcripts from any deposition taken in the case of *Atlantic Recording Corp. et al. vs. Tanya Andersen*, Case No. 3:05-cv-00933-AC, in the U.S. District Court for the District of Oregon.
15. All deposition transcripts from any deposition taken in the case of *Tanya Andersen vs. Atlantic Recording Corp. et al.*, Case No. 3:07-cv-00934-BR, in the U.S. District Court for the District of Oregon.
16. All DOCUMENTS CONCERNING any copyright infringement lawsuits filed against any PERSON for alleged use of an ONLINE MEDIA DISTRIBUTION SYSTEM, in which that PERSON prevailed or which otherwise terminated in favor of that PERSON.
17. All DOCUMENTS CONCERNING any copyright infringement lawsuits filed against any PERSON for alleged use of an ONLINE MEDIA DISTRIBUTION SYSTEM, in which that PERSON was awarded attorneys fees.
18. All expert reports CONCERNING Tanya Andersen, including any investigation or determination that her IP address was used to download SOUND RECORDINGS, and further including any examination of Tanya Andersen's computer, in the case of *Atlantic Recording Corp. et al. vs. Tanya Andersen*, Case No. 3:05-cv-00933-AC, in the U.S. District Court for the District of Oregon, and in the case of *Tanya Andersen vs. Atlantic Recording Corp. et al.*, Case No. 3:07-cv-00934-BR, in the U.S. District Court for the District of Oregon.
19. All DOCUMENTS CONCERNING any press release, press report, public statement, or news report relating to the subject matter of the Recording Industry Association of America's enforcement of copyrights against PERSONS using an ONLINE MEDIA

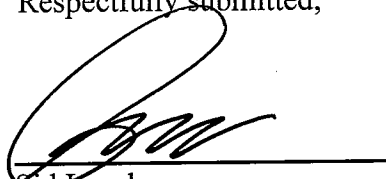
DISTRIBUTION SYSTEM to download, upload, share or copy SOUND RECORDINGS.

20. All DOCUMENTS CONCERNING any press release, press report, public statement, or news report relating to the subject matter of YOUR enforcement of copyrights against PERSONS using an ONLINE MEDIA DISTRIBUTION SYSTEM to download, upload, share or copy SOUND RECORDINGS.
21. All DOCUMENTS CONCERNING the extent to which an IP address can be used to identify a PERSON using an ONLINE MEDIA DISTRIBUTION SYSTEM to download, upload, share or copy SOUND RECORDINGS.
22. All DOCUMENTS CONCERNING the error rate involved in using an IP address to successfully identify a PERSON using an ONLINE MEDIA DISTRIBUTION SYSTEM to download, upload, share or copy SOUND RECORDINGS.
23. All DOCUMENTS CONCERNING the reliability of using an IP address to identify a PERSON using an ONLINE MEDIA DISTRIBUTION SYSTEM to download, upload, share or copy SOUND RECORDINGS.
24. All DOCUMENTS CONCERNING whether or not an IP address is reasonably relied upon by experts in the relevant field in forming opinions or inferences upon the identity of a PERSON using an ONLINE MEDIA DISTRIBUTION SYSTEM to download, upload, share or copy SOUND RECORDINGS.
25. All DOCUMENTS CONCERNING communications between any of the Plaintiffs relating to Defendant Janne Lanzoni.
26. All DOCUMENTS CONCERNING communications between any of the Plaintiffs relating to IP address 70.232.28.96.

27. All DOCUMENTS CONCERNING communications between any of the Plaintiffs relating to Case ID# 119153302.
28. All DOCUMENTS CONCERNING communications between any of the Plaintiffs on the subject matter of copyrights, copyright infringement, or enforcement of copyrights.

February 18, 2009.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'SL', is written over a horizontal line.

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on February 18, 2009, I served a copy of the foregoing discovery request upon Plaintiffs by mailing a copy via First Class Mail in a sealed envelope, postage prepaid, addressed to the last know address of Plaintiffs' counsel of record as follows:

Stacy R Obenhaus  
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By: \_\_\_\_\_

  
Sid Leach