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 6 IO GROUP, INC.

7
 8 **UNITED STATES DISTRICT COURT**
 9 **NORTHERN DISTRICT OF CALIFORNIA**

10)	
11)	CASE NO.:
12)	
13)	COMPLAINT:
14)	
15)	(1) COPYRIGHT INFRINGEMENT;
16)	(2) CONTRIBUTORY COPYRIGHT
17)	INFRINGEMENT;
18)	(3) VICARIOUS COPYRIGHT
19)	INFRINGEMENT; AND
20)	(4) MISAPPROPRIATION OF RIGHT
21)	OF PUBLICITY (COMMON LAW
22)	AND CAL. CIV. PRO. § 3344)
23)	
24)	JURY TRIAL DEMANDED
25)	
26)	
27)	
28)	

IO GROUP, INC. d/b/a TITAN MEDIA, a
 California corporation,

 Plaintiff,

 vs.

 GILBERT MICHAEL GONZALES, an
 individual; and DOES 1-21, individuals,

 Defendant.

21
 22 **INTRODUCTION**

23 1. This is an action by IO GROUP, INC. a California corporation, d/b/a Titan Media
 24 (“Titan Media”), to recover damages arising from infringement of Titan Media’s copyrights in its
 25 creative works by Defendants GILBERT MICHAEL GONZALES and DOES 1-21, whose names
 26 have not yet been determined, and to enjoin Defendants from future infringement. Defendants
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 28

1 reproduced, distributed and publicly displayed, through several Internet piracy web blogs certain
2 Titan Media-owned photographs and audiovisual works.

3
4 **THE PARTIES**

5 2. Io Group, Inc. is a California corporation doing business as "Titan Media," with its
6 principal place of business located at 69 Converse Street, San Francisco, California 94103. Titan
7 Media produces, markets, and distributes adult entertainment products, including Internet website
8 content, videos, DVDs, photographs, etc. Plaintiff operates and maintains a website by and
9 through which its photographic and audiovisual works can be viewed by individuals who pay a
10 monthly subscription fee.
11

12 3. Plaintiff has won numerous awards for its high quality work, beginning with an
13 award for Best Gay Video in its first year in existence (1995). Since then Plaintiff has won awards
14 nearly every year including awards for Best Art Direction, Best Videography, Best Packaging,
15 Best DVD Extras, Best Cinematography and Best Editing. Plaintiff is recognized throughout the
16 industry as one of the highest quality producers of gay erotica.
17

18 4. Plaintiff is informed and believes, and based thereon alleges, GILBERT
19 MICHAEL GONZALES is an individual who resides in Desert Hot Springs, CA and operates a
20 piracy ring through which he engages in the large scale reproduction, distribution and public
21 display of copyrighted works including works owned by and registered to Plaintiff Titan Media.
22

23 5. Defendant GONZALES is one of a growing number of individuals who maintain
24 Internet-based piracy web blogs which are designed and operated for the sole purpose of
25 distributing pirated versions of audio visual works, including audio visual works belonging to
26 Plaintiff.
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1 and have committed unlawful and tortuous acts both within and outside the State of California
2 causing injury in California. Plaintiff's claims arise out of the conduct that gives rise to personal
3 jurisdiction over Defendants.
4

5 **INTRADISTRICT ASSIGNMENT**

6 11. Since this matter is based in copyright it may be assigned to any of the three
7 divisions of the District Court for the Northern District of California.

8 **VENUE**

9 12. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391(b)(2) and 1400(a).
10

11 **BACKGROUND**

12 13. Technological advances have made it increasingly possible to transfer large
13 amounts of data, including digital video files, by and through the Internet. As Congress and the
14 courts clarify the law and close legal loopholes in order to hold infringers liable for their actions,
15 would-be infringers develop new and often increasingly complex means of engaging in piracy,
16 hoping that the complexity of their systems will help them avoid detection, identification and
17 prosecution. Defendants' operation represents one of the latest incarnations of on-line digital
18 piracy.
19

20 14. In order to facilitate the efficient transfer of unauthorized copies of audio visual
21 files, Defendant GONZALES first obtains a copy of the audiovisual works and employs
22 specialized technology to strip any protective measures from the work in order that the digital files
23 can be reproduced, transferred and viewed without limitation. This process is commonly referred
24 to as "ripping".
25

26 15. In order to distribute the newly ripped pirated versions of the works, GONZALES
27 must place the files on storage devices that are accessible to others. Maintaining the digital files on
28

1 a personal computer is not a satisfactory means for distribution because only a large capacity
2 computer system could simultaneously transfer multiple copies of numerous audiovisual works at
3 an acceptable transfer rate. Moreover, if GONZALES maintained the files on his own computer
4 his infringing activities would be more readily detectable.

5
6 16. Therefore, after making illegal rips of audiovisual works, GONZALES places the
7 unauthorized copies with one of many commercial enterprises offering free computer server space
8 for hosting digital files. GONZALES places the unauthorized copies he creates on servers
9 operated by a German-based company which operates a website located at the domain
10 rapidshare.com. Each time GONZALES uploads a video file to rapidshare.com, Rapidshare
11 provides him with a unique link identifying the exact location of the file on rapidshare.com
12 servers. For example, one of Plaintiff's works GONZALES infringed was assigned the rapidshare
13 location <http://rapidshare.com/files/52781850/BaSt.part01.rar>.

14
15
16 17. Rapidshare does not index digital files placed on its system or provide any
17 searching capabilities. Therefore, in order to locate a file, an individual must have the exact file
18 location or "link". In order to distribute the files to others, GONZALES provides the rapidshare
19 links so they can locate the infringing files on Rapidshare's servers and download the files to their
20 personal computers for unlimited viewing and further distribution.

21
22 18. When recipients enter the link into an Internet browser (or click on a copy of the
23 link while viewing a webpage) they are directed to the location on Rapidshare.com's servers
24 where the file is located. Recipients can then download the unauthorized copies to their personal
25 computers for unlimited viewing. Recipients can increase the amount of material they can
26 download and the rate of download speed by purchasing a premium account from Rapidshare.
27 Exhibit A represents a true and complete copy of a rapidshare page linking to the location where a
28

1 portion of Plaintiff's work *Barnstorm* is hosted. By clicking the "premium" or "free" buttons the
2 user can download the unauthorized copy of Plaintiff's audiovisual work to his computer for
3 unlimited viewing or further distribution.
4

5 19. In order to distribute the links to as many people as possible, as efficiently as
6 possible, GONZALES creates and operates various online piracy web blogs. By and through these
7 web blogs, GONZALES publishes pictures and descriptions of the pirated audiovisual works
8 along with the rapidshare.com links where he stores the unauthorized copies. GONZALES
9 provides new descriptions, pictures and links to infringing files on a daily basis.
10

11 20. Users visiting GONZALES' piracy web blogs can simply click on the links he lists
12 thereon and those users are directed to the rapidshare location where they can download the digital
13 video files they wish to view for free.

14 21. GONZALES knows the Plaintiff actively protects its intellectual property and that
15 Plaintiff searches the Internet for violations of its copyrights. Therefore, GONZALES and the
16 other participants in his piracy ring take measures designed to thwart Plaintiff's ability to detect
17 their illegal activity. Rather than refer to Plaintiff by name, GONZALES, refers to Plaintiff as "the
18 evil empire" and often inserts characters in place of letters in the titles of Plaintiff's works. For
19 example, *Barnstorm* becomes B@rnst0rm. When GONZALES posts Plaintiff's works he uses
20 pictures as rebus clues rather than actual images from the works. For example, a picture of Snoopy
21 fighting the Red Barron represents Plaintiff's work *Barnstorm*. This also is designed to help avoid
22 detection. Exhibit B is a true and complete copy of a GONZALES posting exemplifying these
23 evasive tactics. The rapidshare links appear as rs 1 to rs 10.
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1 28. All Defendants knew or should have known that Plaintiff's principle place of
2 business is in San Francisco, California and that infringement of its works was likely to cause
3 harm in California.

4 29. At various times, during regular inspections of Internet websites, Plaintiff's
5 employees discovered and documented a number of Titan Media copyrighted works being
6 publicly displayed and or distributed by and through piracy web blogs operated by Defendant
7 GONZALES, including without limitation, timeforcookies.blogspot.com, tforc2.blogspot.com,
8 mcgmen.blogspot.com, and mcgsmen2.ning.com.

9 30. On at least one occasion, GONZALES also distributed an unauthorized copy of
10 Plaintiff's work by providing an unauthorized copy of the work to a website operated at
11 gaytorrent.ru, a piracy website operated from Germany.

12 31. Plaintiff previously sent notice to the Internet service provider who hosted
13 Defendants' blogs requesting that the links to the infringing files be blocked or removed.

14 32. Plaintiff is informed and believes and based thereon alleges that service providers
15 cancelled each of the former piracy web blogs operated by Defendant GONZALES. However,
16 each time one site was shut down, GONZALES started a new piracy web blog and continued his
17 infringing activity.

18 33. GONZALES currently operates the latest incarnation of his piracy web blog at
19 mcgsmen2.ning.com.

20 34. Concurrent with filing this Complaint, Plaintiff will serve notice to Ning.com, the
21 service provider currently hosting Gonzales' blog, mcgsmen2.ning.com. The Notice will request
22 that Ning.com block access to or remove all links to infringing copies of Plaintiff's works. A true
23 and complete copy of that Notice is attached hereto as Exhibit D.

1 35. Also concurrent with filing this Complaint, Plaintiff will send notice to
2 rapidshare.com, requesting that it remove all of the pirated versions of Plaintiff's works identified
3 in the notice. A true and complete copy of that notice is attached hereto as Exhibit E.
4

5 36. Defendants, without authorization, copied, distributed and/or publicly displayed at
6 least forty-five (45) audiovisual works owned by and registered to Plaintiff.

7 **FIRST CAUSE OF ACTION**

8 (Copyright Infringement – 17 U.S.C. §501)

9 Plaintiff Titan Media Owns Federally Registered Copyrights of Various Creative Works

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11 37. Plaintiff repeats and incorporates by this reference each and every allegation set
12 forth in paragraphs 1 through 36, inclusive.

13 38. At all times relevant hereto, Plaintiff has been the producer and owner of the
14 photographic and audiovisual works reproduced, distributed and publicly displayed by Defendants
15 through various online piracy web blogs, including without limitation
16 timeforcookies.blogspot.com, tforc2.blogspot.com, mcgmen.blogspot.com, and
17 mcgsmen2.ning.com.
18

19 39. For each of the works at issue in this matter, Plaintiff either holds a copyright
20 registration certificate from the United States Copyright Office or has applied for a registration
21 certificate.
22

23 40. Without authorization, Defendant GONZALES reproduced and distributed the
24 following Plaintiff owned and copyrighted works: *Back to Barstow*, U.S. Copyright Registration
25 Number PA 1-252-048; *Boiler*, U.S. Copyright Registration Number PA 1-368-496; *Campus*
26 *Pizza*, U.S. Copyright Registration pending; *Eruption*, U.S. Copyright Registration Number PA
27 990-739; *Factory Fresh*, U.S. Copyright Registration pending; *Farm Hands*, U.S. Copyright
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1 Registration Number PA PA 1-366-853; *H2O*, U.S. Copyright Registration Number PA 1-379-
2 764; *Holler*, U.S. Copyright Registration Number PA 1-119-433; *Laid Up*, U.S. Copyright
3 Registration Number PA 1-040-878; *Life Guard*, U.S. Copyright Registration pending *ManPlay*[®]
4 *10*, U.S. Copyright Registration Number PA 1-228-121; *ManPlay*[®] 22: *Hard Work*, U.S.
5 Copyright Registration Number PA 1-300-775; *ManPlay*[®] 26: *Nailed*, U.S. Copyright Registration
6 Number PA 1-300-775; *Packers*, U.S. Copyright Registration Number PA 1-233-145; *R.E.M.*,
7 U.S. Copyright Registration Number PA 1-130-969; *Riders*, U.S. Copyright Registration Number
8 PA 1-328-405; *River Patrol*, U.S. Copyright Registration Number PA 885-073; *Seaman: Fallen*
9 *Angel IV*, U.S. Copyright Registration Number PA 1-065-776; *Sex in the City*, U.S. Copyright
10 Registration Number PA1-230-121; *Shacked Up*, U.S. Copyright Registration pending; *Slammer*,
11 U.S. Copyright Registration Number PA 1-119-437; *Spy Quest*, U.S. Copyright Registration
12 Number PA 1-292-223; *Work Out*, U.S. Copyright Registration pending.

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16 41. Without authorization, Defendant DOE 1, who uses the pseudonym “titgars”,
17 reproduced screen captures from Plaintiff’s work *Lifeguard*, U.S. Copyright Registration Number
18 PA 1-304-285, and publicly displayed the unauthorized reproductions by and through the piracy
19 web blog operated by Defendant GONZALES at mcgsmen2.ning.com.

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21 42. Without authorization, Defendant DOE 2, who uses the pseudonym “studly”,
22 reproduced and distributed the Plaintiff owned and copyrighted work *Alabama Take Down*, U.S.
23 Copyright Registration Number PA 1-304-285 via the piracy web blog operated by Defendant
24 GONZALES at mcgsmen2.ning.com.

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26 43. Without authorization, Defendant DOE 3, who uses the pseudonym “hurst”,
27 reproduced and distributed the Plaintiff owned and copyrighted work *At Large*, U.S. Copyright
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1 Registration Number PA 1-230-114 via the piracy web blog operated by Defendant GONZALES
2 at mcgsmen2.ning.com.

3 44. Without authorization, Defendant DOE 4, who uses the pseudonym “serendip”,
4 reproduced and distributed the Plaintiff owned and copyrighted work *Carny*, U.S. Copyright
5 Registration Number PA 1-221-850, via the piracy web blog operated by Defendant GONZALES
6 at mcgsmen2.ning.com.

7 45. Without authorization, Defendant DOE 5, who uses the pseudonym “furrball”,
8 reproduced and distributed the Plaintiff owned and copyrighted work *Folsom Filth*, U.S.
9 Copyright Registration pending, via the piracy web blog operated by Defendant GONZALES at
10 mcgsmen2.ning.com.

11 46. Without authorization, Defendant DOE 6, who uses the pseudonym
12 “bixbegg2000”, reproduced and distributed the Plaintiff owned and copyrighted work *Drill*, U.S.
13 Copyright Registration Number PA 1-274-563, via the piracy web blog operated by Defendant
14 GONZALES at mcgsmen2.ning.com.

15 47. Without authorization, Defendant DOE 7, who uses the pseudonym “bigbuilder”,
16 reproduced and distributed the following Plaintiff owned and copyrighted works *Drill*, U.S.
17 Copyright Registration Number PA 1-274-563, via the piracy web blog operated by Defendant
18 GONZALES at mcgsmen2.ning.com.

19 48. Without authorization, Defendant DOE 8, who uses the pseudonym “david
20 (corsair)”, reproduced and distributed the Plaintiff owned and copyrighted works *RX*, U.S.
21 Copyright Registration Number PA 1-226-558 and *Laid Up*, U.S. Copyright Registration Number
22 PA 1-040-878, via the piracy web blog operated by Defendant GONZALES at
23 mcgsmen2.ning.com.

1 49. Without authorization, Defendant DOE 9, who uses the pseudonym
2 “jackcoughmee”, reproduced and distributed the Plaintiff owned and copyrighted works *Giant I*,
3 U.S. Copyright Registration Number PA 1-232-273, and *Giant II*, U.S. Copyright Registration
4 Number PA 1-231-073, via the piracy web blog operated by Defendant GONZALES at
5 mcgsmen2.ning.com.
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7 50. Without authorization, Defendant DOE 10, who uses the pseudonym “bart”,
8 reproduced, distributed and publicly displayed the Plaintiff owned and copyrighted work *Hitch*,
9 U.S. Copyright Registration Number PA 1-344-055 via the piracy web blog operated by
10 Defendant GONZALES at mcgsmen2.ning.com.
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12 51. Without authorization, Defendant DOE 11, who uses the pseudonym “thomas”,
13 reproduced, distributed and publicly displayed the Plaintiff owned and copyrighted work *Horse:*
14 *Fallen Angel V*, U.S. Copyright Registration Number PA 1-272-379, via the piracy web blog
15 operated by Defendant GONZALES at mcgsmen2.ning.com.
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17 52. Without authorization, Defendant DOE 12, who uses the pseudonym “jebo2007”,
18 reproduced and distributed the Plaintiff owned and copyrighted work *The List*, U.S. Copyright
19 Registration Number PA 1-232-820, via the piracy web blog operated by Defendant GONZALES
20 at mcgsmen2.ning.com.
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22 53. Without authorization, Defendant DOE 13, who uses the pseudonym
23 “brownsugar”, reproduced, distributed and publicly displayed the Plaintiff owned and copyrighted
24 work *Mensroom: Bakersfield Station*, U.S. Copyright Registration Number PA 1-233-097, via the
25 piracy web blog operated by Defendant GONZALES at mcgsmen2.ning.com.
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27 54. Without authorization, Defendant DOE 14, who uses the pseudonym
28 “princeplanet”, reproduced and distributed the Plaintiff owned and copyrighted work *Naked*

1 *Escape*, U.S. Copyright Registration Number PA 871-481, via the piracy web blog operated by
2 Defendant GONZALES at mcgsmen2.ning.com.

3 55. Without authorization, Defendant DOE 15, who uses the pseudonym “tbear2006”,
4 reproduced and distributed the Plaintiff owned and copyrighted works *R.E.M.*, U.S. Copyright
5 Registration Number PA 1-130-969, *Manhattan Sex Party 1*, U.S. Copyright Registration Number
6 PA 1-232-277, and *Copshack 2: Crossing the Line*, U.S. Copyright Registration Number PA 1-
7 366-927, via the piracy web blog operated by Defendant GONZALES at mcgsmen2.ning.com.

8 56. Without authorization, Defendant DOE 16, who uses the pseudonym “jason scott”,
9 reproduced and distributed the Plaintiff owned and copyrighted work *Road to Redneck Hollow*,
10 U.S. Copyright Registration Number PA 1-379-760, via the piracy web blog operated by
11 Defendant GONZALES at mcgsmen2.ning.com.

12 57. Without authorization, Defendant DOE 17, who uses the pseudonym “taylor
13 hutchence”, reproduced and distributed the Plaintiff owned and copyrighted work *Packers*, U.S.
14 Copyright Registration Number PA 1-233-145, via the piracy web blog operated by Defendant
15 GONZALES at mcgsmen2.ning.com.

16 58. Without authorization, Defendant DOE 18, who uses the pseudonym “david
17 shilman”, reproduced and distributed the Plaintiff owned and copyrighted works *Spy Quest 3*, U.S.
18 Copyright Registration Number PA 1-366-857 and *Folsom Leather*, U.S. Copyright Registration
19 pending, via the blog operated by Defendant GONZALES at mcgsmen2.ning.com.

20 59. Without authorization, Defendant DOE 19, who uses the pseudonym “bitchy
21 bowen”, reproduced and distributed the Plaintiff owned and copyrighted work *Tag Team*, U.S.
22 Copyright Registration Number PA 992-998, via the piracy web blog operated by Defendant
23 GONZALES at mcgsmen2.ning.com.

1 60. Without authorization, Defendant DOE 20, who uses the pseudonym “ulises”,
2 reproduced and distributed the Plaintiff owned and copyrighted work *Desert Train*, U.S.
3 Copyright Registration Number PA 984-689, via the piracy web blog operated by Defendant
4 GONZALES at mcgsmen2.ning.com.
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6 61. Without authorization, Defendant DOE 21, who uses the pseudonym “u-ron”,
7 reproduced and distributed the Plaintiff owned and copyrighted work *Campus Pizza*, U.S.
8 Copyright Registration pending, via the piracy web blog operated by Defendant GONZALES at
9 mcgsmen2.ning.com.
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11 62. Plaintiff did not authorize Defendants’ copying, display or distribution of its works.

12 Defendants Willfully Infringed Plaintiff’s Registered Copyrights

13 63. Defendants infringed the copyrights in Plaintiff’s creative works by reproducing,
14 distributing and/or publicly displaying the works by and through various piracy web blogs without
15 proper approval or authorization of Plaintiff.
16

17 64. Defendants knew the infringed works belonged to Plaintiff and that they did not
18 have permission to exploit Plaintiff’s works.

19 65. Each of the Doe Defendants’ distributed Plaintiff’s works by and through the
20 piracy web blog mcgsmen2.ning.com where Plaintiff’s efforts to prevent infringement of its works
21 was openly discussed, where Plaintiff’s anti-piracy measures were ridiculed and mocked, and
22 where tactics were specifically designed and employed to make it difficult for Plaintiff to detect
23 the illegal activity.
24

25 66. Defendants knew their acts constituted copyright infringement.

26 67. Defendants’ conduct was willful within the meaning of the Copyright Act.
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1 **THIRD CAUSE OF ACTION**

2 **(Vicarious Copyright Infringement)**

3 77. Plaintiff repeats and incorporates by this reference each and every allegation set
4 forth in paragraphs 1 through 75, inclusive.

5 78. Numerous individuals and entities directly infringed Plaintiff's copyrighted works.

6 79. Defendants had the right and ability to control the infringing acts of the individuals
7 or entities who directly infringed Plaintiff's works.

8 80. Defendants obtained a direct financial benefit from the infringing activities of the
9 individuals or entities who directly infringed Plaintiff's works.

10 81. The acts and conduct of Defendants, as alleged above in this Complaint constitute
11 vicarious copyright infringement.

12 **FOURTH CAUSE OF ACTION**

13 **(Misappropriation of the Right of Publicity (Common Law and Cal. Civ. Pro. § 3344))**

14 82. Plaintiff repeats and incorporates by this reference each and every allegation set
15 forth in paragraphs 1 through 80, inclusive.

16 83. Plaintiff's copyrighted works embody images of actors all of whom executed
17 written agreements with Plaintiff through which Plaintiff became the exclusive proprietor of the
18 actors' rights of publicity in the performances embodied in Plaintiff's creative works.

19 84. Defendants infringed the rights of publicity owned and controlled by Plaintiff by
20 displaying images of the actors for commercial gain without authorization.

21 85. As a direct and proximate result of Defendants' conduct as aforesaid, Plaintiff has
22 been damaged by lost income in an amount to be determined at trial.

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- 1 a. willfully infringed Plaintiff's rights in federally registered copyrights under 17
- 2 U.S.C. § 501,
- 3 b. willfully violated Plaintiff's assigned rights of publicity in violation of
- 4 California common law and Cal. Civ. Code §3344; and
- 5 c. otherwise injured the business reputation and business of Plaintiff by
- 6 Defendants' acts and conduct set forth in this Complaint.
- 7

8 (2) That the Court issue injunctive relief against Defendants, and that Defendants, their
9 agents, representatives, servants, employees, attorneys, successors and assigns, and all others in
10 active concert or participation with them, be enjoined and restrained from copying, posting or
11 making any other infringing use or infringing distribution of audiovisual works, photographs or
12 other materials owned by or registered to Plaintiff's;

13 (3) That the Court enter an order of impoundment pursuant to 17 U.S.C. §§ 503 and
14 509(a) impounding all infringing copies of Plaintiff's audiovisual works, photographs or other
15 materials, which are in Defendants' possession or under its control;

16 (4) That the Court order Defendants to pay Plaintiff's general, special, actual and
17 statutory damages as follows:

- 18 a. Plaintiff's damages and Defendants' profits pursuant to 17 U.S.C. § 504(b), or
- 19 in the alternative, enhanced statutory damages pursuant to 17 U.S.C. §
- 20 504(c)(2), for Defendants' willful infringement of Plaintiff's copyrights; and
- 21 b. Plaintiff's damages and Defendants' profits pursuant to Cal. Civ. Code § 3344
- 22 or in the alternative statutory damages pursuant to Cal. Civ. Code § 3344;
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24 (6) That the Court order Defendants to pay punitive damages pursuant to Cal. Civ. Code §
25 3344.
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(7) That the Court order Defendants to pay Plaintiff both the costs of this action and the reasonable attorney's fees incurred by it in prosecuting this action pursuant to 17 U.S.C. § 504 and Cal. Civ. Code § 3344(a).

(8) That the Court grant to Plaintiff such other and additional relief as is just and proper.

Dated: *September 28, 2007*

Respectfully submitted,



GILL SPERLEIN
Attorney for Plaintiff, IO GROUP, INC.

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CERTIFICATION OF INTERESTED PERSONS

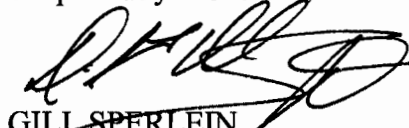
Pursuant to Civil L.R. 3-16, the undersigned certifies that the following listed persons (i) have a financial interest in the subject matter in controversy or in a party to the proceeding, or (ii) have a non-financial interest in that subject matter or in a party that could be substantially affected by the outcome of this proceeding:

Bruce Lahey – majority shareholder of Io Group, Inc.

Brian Ashby – minority shareholder of Io Group, Inc.

Dated: *September 28, 2007*

Respectfully submitted,



GILL SPERLEIN
Attorney for Defendant IO GROUP, INC.