

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FIRST TIME VIDEOS, LLC)	
)	
Plaintiff,)	
)	11-cv-3831
v.)	
DOES 1-76,)	Judge Hon. Elaine E. Bucklo
)	
Defendants.)	Magistrate Judge: Hon. Michael T. Mason

**REPLY IN SUPPORT OF MOTION BY JOHN/JANE DOE 98.215.224.86 TO QUASH
SUBPOENA, FOR SEVERANCE, AND FOR COST AND FEES PURSUANT TO 17 USC § 505**

Movant, John/Jane Doe, identified by IP Address number 98.215.224.86 (hereinafter referred to as "Doe" or "Movant"), by and through his/her attorney, Mirsafian Law Group, LLC, on behalf of this Movant only, offers this Reply In Support of his/her Motion and states as follows:

1. Movant adopts and incorporates by reference herein the arguments set forth in "Reply In Support Of Motion Of Does 71.239.21.116 and 24.15.217.106 To Quash Subpoena, Dismiss This Defendant For Improper joinder, And Recover Attorney's Fees And Costs" (Document number: 34, filed 08-10-11 by attorney Jay Hoffman).

2. Further, it should be noted that this case is NOT the first of its kind filed by Plaintiff's counsel. Numerous matters, similar to the case at hand, are currently pending in the Northern District of Illinois and other Federal District Courts. This fact is brought to the Court's attention to show that Plaintiff's counsel is well aware of his improper filings, particularly with respect to the issue of Joinder. On multiple occasions, various Federal District Courts have dismissed these cases filed by Plaintiff's counsel due to improper joinder. (See the Court Order entered by Judge Balche M. Manning attached hereto in Exhibit A).

3. The above mentioned filings by Plaintiff's counsel should be of concern to this Court because Plaintiff's Counsel is blatantly and intentionally filing suits, with knowledge of improper joinder, against multiple unknown defendants in an effort to circumvent the Federal Rules of Civil Procedure.

4. By improperly and advantageously filing suit against multiple unknown defendants, Plaintiff's Counsel is able to then file *ex parte* discovery motions followed by subpoenas to Internet Service Providers ("ISP") to ascertain the names and contact information of the unknown defendants based on IP addresses.

5. As already noted in the Reply In Support filed by Jay Hoffman, Plaintiff's Counsel then contacts these individuals and demand money in what should be considered an unethical shakedown of unknown defendants.

6. This is quite troubling since most of these unknown defendants are not able to obtain counsel due to financial reasons and are therefore forced to accept an unreasonable settlement to avoid costly litigation. In fact, twelve (12) of the unknown defendants in this matter have already been dismissed from this suit by Plaintiff's counsel, presumably through settlement because of the intimidation and extortion addressed above.

For all of the above-mentioned reasons, Movant's Motion To Quash Subpoena, For Severance, And for Cost and Fees pursuant to 17 USC § 505 should be granted.

Respectfully submitted,

JOHN/JANE DOE 98.215.224.86

By: /s/ Masoud Mirsafian
Attorney of Record

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing REPLY IN SUPPORT OF MOTION BY JOHN/JANE DOE
98.215.224.86 TO QUASH SUBPOENA, FOR SEVERANCE, AND FOR COST AND FEES
PURSUANT TO 17 USC § 505 was filed with the Clerk of Court using the ECF system on August 11,
2011, and thereby served on all counsel of record.

By: /s/ Masoud Mirsafian
Attorney of Record