

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

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<b>David Murray, et al.</b>	)	
Plaintiffs	)	
	)	
v.	)	Civil Action # AW 07 CV 2261
	)	
<b>Alulim Willow Property Group, LLC, et al.</b>	)	
Defendants	)	
_____	)	

**ORDER**

Upon consideration of Plaintiffs’ Motion for Leave to Conduct Discovery on Facts Relevant to the Identities of Defendants, it is hereby ordered that Plaintiffs are granted leave to conduct discovery reasonably calculated to lead to the identification of Defendants, to be concluded within ninety (90) days of the date of this order.

\_\_\_\_\_  
Judge

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**David Murray, et al.**  
Plaintiffs

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Defendants

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**PLAINTIFFS' MOTION FOR LEAVE TO CONDUCT DISCOVERY ON  
FACTS RELEVANT TO THE IDENTITIES OF DEFENDANTS**

Plaintiffs, through counsel, move for leave to take discovery on facts relevant to the identification of the Defendants, and state as follows:

1. Local Rule 104.4 prohibits Plaintiffs from taking discovery prior to the issuance of a scheduling order, absent leave of court or agreement by the parties. To date, none of these circumstances exist. Plaintiffs file this motion to seek leave of Court pursuant to the Local Rule.

2. As described in Plaintiffs' Complaint, the Defendants in this matter have collaborated in forming and running a fraudulent scheme. The fraud alleged includes the deceptive business plans and models, falsification of the Defendants' true identities, and falsification of corporate records in the District of Columbia, among others.

3. There is an entire body of information that is uniquely in the possession of the Defendants, their agents, or third parties that would allow the Plaintiffs to determine the true identify of the Defendants. Plaintiffs seek to conduct discovery of this information via written requests and via deposition.

4. As stated in the Complaint, Defendants advertised job openings on a multitude of job websites, including Craigslist.org, AWPGroupCareers.com, 2Worksathome.com,

Sciencejobs.com, and Academiccareers.com. While the true identities of the Defendants could not be determined from the ads themselves, the job advertisement firms would have information about the Defendants' identities, because the Defendants provided payment information to these firms.

5. In addition to the employment advertisement firms, Margaret McBreairty, the "Operations Manager" to whom new employees were instructed to fax their signed contracts, would have additional information.

6. Plaintiffs believe that numerous other entities would be potential sources of information from which Plaintiffs could determine the true identities of the Defendants.

7. Plaintiffs are forced to seek discovery for functional reasons. Service cannot be made on Defendants unless their true identities and locations are revealed.

8. Plaintiffs are further entitled to discovery for reasons of fairness. Precluding Plaintiffs from seeking discovery would have the effect of preventing Plaintiffs the opportunity to prove the allegations in their well-pled complaint, because Defendants would never be identified or served with process.

Accordingly, Plaintiffs respectfully request leave to take discovery as to the true identities of the Defendants.



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09/19/2007

Date

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