

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
IN NASHVILLE**

TAYLOR SWIFT,

Plaintiff

v.

MALCOLM MATTHEWS; RENEE SUSAN MITCHELL; LOUIS MOORE; MARTIN D. QUATTLEBAUM; MARSHA DYONNE TYLER; MELLISSA LIEBERMAN; EDWARD FRIEDMAN; KENNETH JOHNSON; ROBERT VINCENT ESTRONZA; TAIEF HASSON WALLACE; VANCE HILL; VERNANDO SMITH; ANDRE ANTHONY JONES; FRANK PARSONS; CARLO PONTI SMITH; WILBERT G. PRINCE; MERVIN A. BROWN; ERIC LOPP; JEFFREY L. WATKINS; DENNIS LANE WEAVER; KILO JAMES; TYRONE "PIGGY" SQUIRES; BURRELL DICKERSON; and BRAULIO RIVIERA,

Defendants

Civil Action No. 3:09-CV-0442

Judge Wiseman

Magistrate Judge Griffin

**PLAINTIFF'S NOTICE OF MOTION
FOR ORDER OF DESTRUCTION OF COUNTERFEIT GOODS**

The plaintiff, Taylor Swift ("Plaintiff"), by and through undersigned counsel, and pursuant to the Court's Order dated September 14, 2010 (Document 95), hereby gives notice of Plaintiff's intention to seek, pursuant to 15 U.S.C. § 1118, an order of destruction of any and all counterfeit articles seized from any unidentified defendants in this case and from the defendants

Malcolm Matthews, Renee Susan Mitchell, Louis Moore, Marsha Dyonne Tyler, Mellissa Lieberman, Edward Friedman, Kenneth Johnson¹ and Taief Hasson Wallace pursuant to the Court's Temporary Restraining Order and Order of Seizure of Counterfeit Goods, entered on May 19, 2009 (Docket 12), Order Granting Plaintiff's Motion to Extend Temporary Restraining Order and Order of Seizure of Counterfeit Goods, entered on May 28, 2009 (Document 17), and/or the Preliminary Injunction and Order of Seizure of Counterfeit Goods, entered on June 17, 2009 (Document 33). In accordance with 15 U.S.C. § 1118, Plaintiff shall file her motion upon the expiration of the ten-day period following the filing of this Notice.

Respectfully submitted,

/s/ Natalya L. Rose
W. Michael Milom (No. 002803)
David S. Crow (No. 020699)
Natalya L. Rose (No. 021701)
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Attorneys for Plaintiff
Taylor Swift

¹ The Clerk of the Court issued Summons to defendant Kenneth Johnson on June 19, 2009 (Document 32), and Plaintiff attempted to serve the Summons and the First Amended Verified Complaint on Defendant Johnson, by U.S. Postal Service Certified Mail sent on June 22, 2009. However, Plaintiff has not received either a completed Return Receipt, or returned undelivered mail from Defendant Johnson.

CERTIFICATE OF SERVICE

I hereby certify that service of the foregoing Plaintiff's Notice of Motion for Order of Destruction of Counterfeit Goods is being accomplished on this 24^h day of September, 2010, through hand-delivery to Jerry E. Martin, U.S. Attorney for the Middle District of Tennessee, 110 Ninth Avenue, South, Suite A961, Nashville, Tennessee 37203, and through delivery by U.S. First Class Mail, postage pre-paid, upon the following:

Martin D. Quattlebaum
8556 Kendrick Road
Jonesboro, Georgia 30126

Robert Vincent Estronza
1281 Brockett Road
Clarkston, Georgia 30021

Vance Hill
6169 Charring Cross Court
Lithonia, Georgia 30058

Vernando Smith
1119 Redantrian Court
Stone Mountain, GA 30088

Andre Anthony Jones
8330 Bluff Road
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1622 Curry Street
Columbia, South Carolina 29204

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/s/ Natalya L. Rose
Natalya L. Rose