

**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, BRENDAN SCHIFF, MELLISSA LIEBERMAN, EDWARD FRIEDMAN, KENNETH JOHNSON, ROBERT VINCENT ESTRONZA, TAIEF HASSON WALLACE, VANCE HILL, VERNANDO SMITH, ANDRE ANTHONY JONES, FRANK PARSONS, WILBERT G. PRINCE, CARLO PONTI SMITH, MERVIN A. BROWN, ERIC LOPP, JEFFREY L. WATKINS, DENNIS LANE WEAVER, KILO JAMES, TYRONE "PIGGY" SQUIRES, BURRELL DICKERSON, BRAULIO RIVIERA,

Defendants.

Civil Action No. 3:09-0442

Judge Wiseman

Magistrate Judge Griffin

FILED UNDER SEAL

SECOND AMENDED COMPLAINT

The plaintiff, Taylor Swift ("Plaintiff"), files this Seconded Amended Complaint in accordance with the Court's Order of October 6, 2009 (Doc. 73) to name John Does, Jane Does and XYZ Corporations identified by Plaintiff pursuant to the Temporary Restraining Order and Order of Seizure of Counterfeit Goods issued on May 19, 2009 (Doc. 12) and extended on May

28, 2009 (Doc. 17) (“TRO and Order of Seizure”), and the Preliminary Injunction and Order of Seizure of Counterfeit Goods issued on June 17, 2009 (Doc. 33) and extended October 26, 2009 (Doc. 79) (“Preliminary Injunction and Order of Seizure”).

Plaintiff adopts and re-alleges by reference all statements in Plaintiff’s Verified Complaint (Doc. 1) and First Amended Verified Complaint (Doc. 26), and further states as follows:

PARTIES

1. Upon information and belief, Defendant Kenneth Johnson is an individual whose principal residence is located at 3715 Ramsey Circle, Atlanta, Georgia 30331.

2. Upon information and belief, Defendant Robert Vincent Estronza is an individual whose principal residence is located at 1281 Brockett Road, Clarkston, Georgia 30021.

3. Upon information and belief, Defendant Taief Hasson Wallace is an individual whose principal residence is located at 3600 Clubhouse Circle, Decatur, Georgia 30032.

4. Upon information and belief, Defendant Vance Hill is an individual whose principal residence is located at 6169 Charring Cross Court, Lithonia, Georgia 30058.

5. Upon information and belief, Defendant Vernando Smith is an individual whose principal residence is located at 1119 Redantrian Court, Stone Mountain, GA 30088.

6. Upon information and belief, Defendant Andre Anthony Jones is an individual whose principal residence is located at 8330 Bluff Road, Columbia, South Carolina 29214.

7. Upon information and belief, Defendant Frank Parsons is an individual whose principal residence is located at 1622 Curry Street, Columbia, South Carolina 29204.

8. Upon information and belief, Defendant Wilbert G. Prince is an individual whose principal residence is located at 1837 Barbara Drive 11A, Columbia, South Carolina 29223.

9. Upon information and belief, Defendant Carlo Ponti Smith is an individual whose principal residence is located at 2225 Hwy 1 South, Apt. 905, Elgin, South Carolina 29073.

10. Upon information and belief, Defendant Mervin A. Brown is an individual whose principal residence is located at 1627 Carnegie Street, Apt. B, Columbia, South Carolina 29204-1472.

11. Upon information and belief, Defendant Eric Lopp is an individual whose principal residence is located at 153-20 123 Avenue, Jamaica, New York 11434.

12. Upon information and belief, Defendant Jeffrey L. Watkins is an individual whose principal residence is located at 667 Westwood Drive, Lexington, South Carolina 29073-8038.

13. Upon information and belief, Defendant Dennis Lance Weaver is an individual whose principal residence is located at 3911 St. Andrews, Apt. 302, Columbia, South Carolina 29201.

14. Upon information and belief, Defendant Kilo James is an individual whose principal residence is unknown, and who was personally served with the First Amended Verified Complaint and with the Preliminary Injunction and Order of Seizure on May 12, 2010 in Newark, New Jersey.

15. Upon information and belief, Defendant Tyrone "Piggy" Squires is an individual whose principal residence is unknown, and who was personally served with the First Amended Verified Complaint and with the Preliminary Injunction and Order of Seizure on May 12, 2010 in Newark, New Jersey.

16. Upon information and belief, Defendant Burrell Dickerson is an individual whose principal residence is unknown, and who was personally served with the First Amended Verified

Complaint and with the Preliminary Injunction and Order of Seizure on May 14, 2010 in Uniondale, New York.

17. Upon information and belief, Defendant Braulio Riviera is an individual whose principal residence is unknown, and who was personally served with the First Amended Verified Complaint and with the Preliminary Injunction and Order of Seizure on May 14, 2010 in Uniondale, New York.

18. Defendants Johnson, Estronza and Wallace are individuals who were encountered by Plaintiff's merchandise enforcement team, and identified through its efforts, as offering and selling Counterfeit Goods (as defined in Preliminary Injunction and Order of Seizure of Counterfeit Goods) at Plaintiff's concert at the Philips Arena, in Atlanta, Georgia, on June 13, 2009.

19. Defendants Hill, and Vernando Smith are individuals who were encountered by Plaintiff's merchandise enforcement team, and identified through its efforts, as offering and selling Counterfeit Goods at Plaintiff's concert at the Gwinnett Arena, in Duluth, Georgia, on September 3, 2009.

20. Defendants Jones, Parsons, Prince, and Carlo Ponti Smith are individuals who were encountered by Plaintiff's merchandise enforcement team, and identified through its efforts, as offering and selling Counterfeit Goods at Plaintiff's concert at the Bi-Lo Center, in Greenville, South Carolina, on September 4, 2009.

21. Defendants Brown, Lopp and Watkins are individuals who were encountered by Plaintiff's merchandise enforcement team, and identified through its efforts, as offering and selling Counterfeit Goods at Plaintiff's concert at the Time Warner Arena, in Charlotte, North Carolina, on September 5, 2009.

22. Defendant Weaver is an individual who was encountered by Plaintiff's merchandise enforcement team, and identified through its efforts, as offering and selling Counterfeit Goods at Plaintiff's concert at Colonial Life Arena, in Columbia, South Carolina on April 30, 2010.

23. Defendants James and Squires are individuals who were encountered by Plaintiff's merchandise enforcement team, and identified through its efforts, as offering and selling Counterfeit Goods at Plaintiff's concert at the Prudential Center, in Newark, New Jersey, on May 12, 2010.

24. Defendants Dickerson and Riviera are individuals who were encountered by Plaintiff's merchandise enforcement team, and identified through its efforts, as offering and selling Counterfeit Goods at Plaintiff's concert at the Nassau Coliseum, in Uniondale, New York, on May 14, 2010.

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*

CERTIFICATE OF SERVICE

I hereby certify that service of the foregoing Plaintiff's Second Amended Complaint is being accomplished through delivery by U.S. First Class Mail, postage pre-paid, this 12th day of July, 2010, upon the following:

Martin D. Quattlebaum
8556 Kendrick Road
Jonesboro, Georgia 30126

Kenneth Johnson
3715 Ramsey Circle
Atlanta, Georgia 30331

Robert Vincent Estronza
1281 Brockett Road
Clarkston, Georgia 30021

Taief Hasson Wallace
3600 Clubhouse Circle
Decatur, Georgia 30032

Vance Hill
6169 Charring Cross Court
Lithonia, Georgia 30058

Vernando Smith
1119 Redantrian Court
Stone Mountain, GA 30088

Andre Anthony Jones
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Frank Parsons
1622 Curry Street
Columbia, South Carolina 29204

Wilbert G. Prince
1837 Barbara Drive 11A
Columbia, South Carolina 29223

Carlo Ponti Smith
2225 Hwy 1 South, Apt. 905
Elgin, South Carolina 29073

Mervin A. Brown
1627 Carnegie Street, Apt. B
Columbia, South Carolina 29204-1472

Eric Lopp
153-20 123 Avenue
Jamaica, New York 11434

Jeffrey L. Watkins
667 Westwood Drive
Lexington, South Carolina 29073-8038

Dennis Lance Weaver
3911 St. Andrews, Apt. 302
Columbia, South Carolina 29201

/s/ Natalya L. Rose

Natalya L. Rose