

UNITED STATES DISTRICT COURT  
FOR THE  
WESTERN DISTRICT OF WASHINGTON

IN RE. MINDGEEK,  
ISSUANCE OF DMCA SUBPOENA  
TO AMAZON.COM, INC.

Civil Action No. MS 14 076 RSL

EXHIBIT A  
TO SUBPOENA COMMANDING PRODUCTION BY  
AMAZON.COM, INC.

Items and information requested pursuant to this subpoena are any and all information in your possession pertaining to the identity of the individuals who posted the image available at the following URL:

[http://ecx.images-amazon.com/images/I/61TR5QdhaFL\\_SL500\\_AA280 .jpg](http://ecx.images-amazon.com/images/I/61TR5QdhaFL_SL500_AA280.jpg)

The information requested herein includes but is not limited to:

- a. The individuals' names
- b. The individuals' addresses
- c. The individuals' phone numbers
- d. The individuals' email addresses
- e. Billing information for individuals' advertiser account
- f. The physical address and phone number of the individuals' business


**AFFIDAVIT**

**STATE OF FLORIDA  
COUNTY OF MIAMI-DADE**

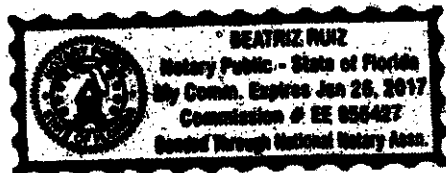
Before me, the undersigned authority, personally appeared Lorena Colombo, who is personally known to me, and after being duly sworn, stated:

1. My name is Lorena Colombo.
2. On August 25, 2014, I prepared and submitted a subpoena (the "Subpoena"), pursuant to 17 U.S.C. § 512(h), to the Clerk of the U.S. District Court for the Western District of Washington.
3. I do swear under penalty of perjury that the Subpoena sought is to obtain the identity of an alleged copyright infringer, and that such information will only be used for the purpose of protecting the copyrights of MindGeek.
4. I have personal knowledge of all facts set forth in this Affidavit.
5. The facts set forth in this Affidavit are true and correct.

**FURTHER AFFIANT SAYETH NAUGHT.**

  
\_\_\_\_\_  
**LORENA COLOMBO  
AFFIANT**

**SWORN TO AND SUBSCRIBED** before me on August 25, 2014, by Lorena Colombo, who is personally known to me.



  
\_\_\_\_\_  
**NOTARY PUBLIC  
STATE OF FLORIDA**

**Lorena Colombo**

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**De:** Lorena Colombo [lorena@markbryn.com]  
**Enviado el:** Monday, August 11, 2014 5:29 PM  
**Para:** 'copyright@amazon.com'  
**CC:** 'Bibi Ruiz'  
**Asunto:** DMCA Notice - Infringing Storefront

**Importancia:** Alta

Dear DMCA Agent:

This law firm has the privilege of representing MindGeek (the "**Company**"), one of the world's largest operators of branded, online entertainment including both adult oriented websites, as well as mobile games and celebrity gossip sites. The Company is also the owner of a certain copyrighted image that it has recently discovered is being used in an Amazon.com storefront without its consent. Below are the links to the page where the infringing image appears, as well as the URL to the infringing image:

Page where the image appears:

[http://www.amazon.com/Molly-Cavalli-Single-L-Lewis/dp/B00IVM8C4U/ref=sr\\_1\\_13](http://www.amazon.com/Molly-Cavalli-Single-L-Lewis/dp/B00IVM8C4U/ref=sr_1_13)

URL to the infringing image:

[http://ecx.images-amazon.com/images/I/61TR5QdhaFL.SL500\\_AA280.jpg](http://ecx.images-amazon.com/images/I/61TR5QdhaFL.SL500_AA280.jpg)

For your ease of comparison, here is a link to the Dropbox® copy of the original image:  
<https://dl.dropboxusercontent.com/u/25394940/065.jpg>

The owner of the Amazon.com storefront where the image appears has never been given permission to use the Company's copyrighted material. Please accept this communication and my statement on behalf of the Company, that I have a good faith belief that the use of the copyrighted materials described above is not authorized by the copyright owner, its agent, or the law. Accordingly, we hereby request: (a) that this image be disabled, and (b) that you provide us with contact information for the seller, so that we may address the Company's claim for relief directly.

I swear, under penalty of perjury, that the information in this notification is accurate and that I am authorized to act on behalf of the owner of an exclusive right that is infringed. Should you require any additional information, please feel free to contact me via phone or e-mail.

Regards,

**/s/ Lorena Colombo**

**Lorena Colombo**  
Attorney-at-Law

BRYN & ASSOCIATES, P.A.  
One Biscayne Tower  
2 South Biscayne Boulevard | Suite 2680 | Miami, Florida 33131

(phone) 305.374.0501 | (fax) 305.372.8068 | (e-mail) [lorena@markbryn.com](mailto:lorena@markbryn.com)

*By typing "/s/" followed by my name, above, I hereby adopt that electronic signature as my own, pursuant to 15 U.S.C. §7001 (the "E-SIGN Act"), and affirmatively consent to its use as such.*

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**CONFIDENTIALITY NOTICE:** The information contained in this e-mail transmission may be privileged and/or confidential. If you have received this e-mail in error, please notify the sender by e-mail reply and delete this transmission and all attachments. Thank you.  
**IRS CIRCULAR 230 DISCLOSURE:** To ensure compliance with requirements imposed by the Internal Revenue Service, we inform you that any U.S. tax advice contained in this communication (including attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or applicable provisions of state and local tax law or (ii) promoting, marketing, or recommending to another party any transaction or matter addressed herein.