

February 2, 2017

David A. Lowe
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Re: Criminal Productions, Inc. v. Robinson, WD WA Case No. 2:16-cv-1272

Dear Mr. Lowe:

This law firm represents Deanna Robinson with respect to the federal lawsuit your law firm has filed against her and personally served on her.

We reference our earlier letters regarding Jasmin Teodoro, Patricia Alexander, Larry Lewis, James Collins, Jaime Alacorn, and Osamu Motoda regarding LHF Productions, Cell Film Holdings, and Criminal Productions. All the defenses we raised in those letters apply equally to Ms. Robinson.

Ms. Robinson is wholly innocent. She and her husband Gabriel live in a home they purchased on 158th SE in the Fairwood Park Division of Renton. The home was built in 1975 and occupies a typical neighborhood for the area. The Robinsons have no children living at home. Neither of the Robinsons have used Bittorrent. Neither of the Robinsons downloaded your client's movie or have any knowledge whatsoever about the allegations. At the time of the alleged incident, they did have wifi at home that was not password protected for their own convenience.

Mr. and Mrs. Robinson left their home on Friday July 22, 2016 for a trip to the Oregon coast. They spent Friday night in Lincoln City, and Saturday and Sunday in Neskowin. We have receipts from their trip and photographs. The Robinsons took two movies with them on the trip that they rented from their Netflix account (DVD account.) The movies arrived at their home on July 19. Interestingly, the Robinsons did rent Criminal from their Netflix (DVD) account on August 3, 2016. I have seen the receipts for these rentals. These are the first people we have ever represented who had even heard of the movie they are accused of downloading, but they did not download it, they rented it for no marginal cost from Netflix.



Ms. Robinson was personally served on January 15, 2017. Her Answer is due next Monday February 6, 2017.

We respectfully request that Criminal Productions voluntarily dismiss Ms. Robinson from the case. If she is dismissed by Noon on Monday February 6, 2017, we will not Answer the Amended Complaint, and we will not seek defense attorneys' fees or costs. If the case is not dismissed by Noon Monday February 6, 2017, we will Answer during the afternoon of February 6, 2017 and we will seek defense attorneys' fees when Ms. Robinson wins, which is a certainty given her innocence.

We apologize for the short turnaround on this case, but my firm was just engaged today. Ms. Robinson reports similar issues as others have reported to us in locating knowledgeable, affordable counsel to defend these federal cases lodged against innocent individuals.

Because of the short time frame, we refer to and incorporate our January 25, 2017 letter for Mr. Motoda which raises a series of our meritorious copyright defenses and the issues particular to Judge Jones and his strict deadlines. We have the same zeal here in our defense of innocent Ms. Robinson as we had for innocent Mr. Motoda.

We are prepared promptly to Answer and immediately to proceed into initial disclosures and discovery. We do not intend to Answer with any Affirmative Defenses or Counterclaims. Our objective will be to avoid unnecessary motion practice so we can focus on discovery as to the liability allegations.

We expect your client's representatives to resist discovery as they have in the past. We are prepared to use the tools of the federal rules to force proper compliance. For example, we note that Criminal Productions seems already to be in violation of Judge Jones' Standing Orders in Case No. 2:16-cv-1177 where the required Rule 26(f) conference and joint discovery plan were not timely initiated. If we are forced to Answer for Ms. Robinson, we will insist on proper compliance with the trio of Judge Jones' Standing Orders applicable to this case, as well as the local and federal rules. Our client has nothing to hide and nothing to lose and thus is prepared for full and timely discovery.

We remain committed to exposing the inadmissibility of the entrapped blip evidence. We remain committed to exposing the relationship of your witness Daniel Arheidt through his identical declarations to the fictitious declarant "Darren M. Griffin," responsible for over 70 declarations filed in our WD WA.



We learned more this week about Dr. Wach's work in Germany to expose the attorney-investigator relationships in these cases. We have also learned about Mr. Achache's tools and database applications for use by law firms involved under the Guardaley umbrella. What we learned this week corroborated the APMC Prezi presentation we linked in our January 25, 2017 letter. These seem like ripe areas for discovery as to the methods of investigation and the real parties in interest.

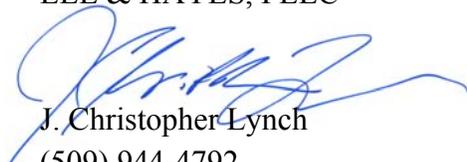
Mostly, we remain committed to fulfillment of the policies of *Fogerty* and *Perfect Ten* by presentation of meritorious copyright defenses. We intend to use the initial disclosures and discovery process to support our meritorious defenses and present them at trial. We are confident this will lead to an award of full defense attorneys' fees when Ms. Robinson prevails, which is a certainty given her innocence.

Please consider our offer to not Answer, nor pursue defense attorneys' fees, if the case against Ms. Robinson is dismissed by Noon, Monday February 6, 2017. Otherwise, we will submit our Answer that afternoon and patiently work towards Ms. Robinson's full exoneration and the ruling on our request for defense attorneys' fees.

Thank you for your consideration of our position.

Very truly yours,

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