

February 27, 2017

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**Re: LHF Productions, Inc. v. Conley, WD WA Case No. 2:16-cv-1588**

Dear Mr. Lowe:

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

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

Ms. Conley is wholly innocent. She is 65 years old and works for Costco. Ms. Conley's home is 800 square feet and was built in 1943. Her home is in a southwest Seattle neighborhood crowded with older homes. Ms. Conley bought her home in 2007. She lives alone.

Ms. Conley has not used Bittorrent. Prior to being accused in this lawsuit, Ms. Conley had never heard of your client's film and she has no interest in it. If she did have any interest in it, she could have rented it for no marginal cost using her Amazon Prime account.

Ms. Conley was asleep on Thursday September 22, 2016 at 11:38:02 pm pacific time when your client's foreign investigator entrapped its blip. She was at home that evening. No one else was in her house. On work nights, Ms. Conley customarily goes to bed between 9:00 and 9:30 pm, and she arises between 5:00 am and 5:30 am. Ms. Conley's home has wifi which is password protected, so she has no explanation how she has been ensnared. She is certain, however, that she did not copy your client's movie and that no one in her home did so. In November, 2016, through attorney Mark Jordan, as a good faith gesture to show her innocence, Ms. Conley identified all of the electronics she has in her home to your law firm.



Ms. Conley was personally served on February 12, 2017. Her Answer is due next Monday March 6, 2017.

We respectfully request that LFH Productions voluntarily dismiss Ms. Conley from the case. If she is dismissed by Noon on Monday March 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 March 6, 2017, we will Answer during the afternoon of March 6, 2017 and we will seek defense attorneys' fees when Ms. Conley wins, which is a certainty given her innocence.

My law firm continues to receive phone calls from people who are wholly innocent, yet have been named as defendants in federal lawsuits by your law firm. We know these people are innocent by thoroughly interviewing them. We have spoken with enough people to have a feel for this innocence. Clearly, your client's foreign representatives' investigators have some flaws in their system, since so many people are named who have never used Bittorrent.

For example, our January 12, 2017 letter to your law firm (regarding innocent defendant Jasmin Teodoro) raises the Motion to Dismiss filed against LHF by defendant Jose Sosa. We surmised Mr. Sosa was innocent from the sincere nature of his denial and correspondence with the Court. We also (accurately) predicted your firm would oppose Ms. Sosa's unorthodox Motion to Dismiss, despite what appears to be his innocence. We saw your well drafted Motion in Opposition, Dkt. #32, but apparently Judge Martinez did not, as he granted Mr. Sosa's Motion. Undaunted, your firm proceeds for Reconsideration of that Order with another well drafted pleading, pointing out the differences in the stock Amended Complaint that passed 12(b)(6) muster in QOTD, but did not in Elf-Man. But the investigative techniques have not changed. The evidence has not changed. Nothing has changed except the additional words in the Complaint. The Court may indeed grant the Reconsideration, but then where you be? Mr. Sosa is not in default as the Court ruled. Presumably his Answer will deny any copyright liability. Will you go to trial against Mr. Sosa?

Will you go to trial against Ms. Conley? How? Why? You spend the money to take her deposition where she looks you and the camera in the eye and truthfully explains she has no idea what you are talking about. What does that achieve? You spend the money to inspect her computers and are left with what – a declaration of Mr. Paige having to acknowledge there is no evidence of Bittorrent use or *London has Fallen*? Then what, go to trial?

Can Mr. Arheidt survive a *Daubert* motion? Even if so, what evidence does he have? “I have this typed up sheet with an IP address on it and a time and date.” How could this be persuasive against the live truthful testimony of Ms. Conley, a kind 65 year old woman who lives alone and had never heard of Bittorrent?

We understand from a (now denied) Motion in ND CA filed by Malibu Media asking for a trial continuance, that Mr. Patzer is moving in March to Thailand (from Spain, but apparently not from the bogus German address we were given for him in Elf-Man.) Will Mr. Patzer come from Thailand to testify in Seattle against Ms. Conley in a case LFH cannot win?

We understand from that same ND CA case that Mr. Paige’s infamous “test” of the “IPP” system (i.e. the subject of his declaration ECF No. 90 filed by your firm in our Elf-Man case) was not undertaken by Mr. Paige, but was undertaken by his former partner, Dave Kleiman. Mr. Kleiman has sued Mr. Paige over his business practices. (Plus of course Mr. Paige was relieved of the sheriff duties he listed to support his declaration by Palm Beach County for taking delivery of illegal drugs under his detective alias name.) If this information about Mr. Kleiman is correct, then Mr. Paige can join Mr. Arheidt as two presumed witnesses on LHF’s witness list with a demonstrated willingness to not tell the whole truth in declarations filed in federal courts. (Mr. Arheidt’s failures include his declaration listing an IDENTICAL work background to Mr. Achache, to Mr. Padawet, to Mr. Dinkela, and to fictitious witness “Darren M. Griffin.”)

Likewise, we understand “former” Crystal Bay Corporation “consultant” and WD WA LHF witness Daniel Macek is no longer available for testimony. Won’t Judge Martinez want to hear from this witness who testified he “observed infringing” by WD WA LHF defendants? We will want to depose him.

We doubt Chief Judge Martinez will tolerate any of these witnesses (or the story about 70+ fictitious “Darren M. Griffin” declarations being filed in WD WA.) Chief Judge Martinez’ identical \$750 “joint and several” default judgments, and his direct challenges to your firm’s accuracy in billing, are clues as to how he might react when he finds out the truth about the Guardaley witnesses and practices.

We could go on, but you get the point. The Judges of the WD WA appear to be getting a better understanding of the system used by your client’s foreign representatives to extract money from people, including some innocent people. Seems the time is ripe for the court to learn the entire truth, which will be shown as soon as my firm is forced to Answer on behalf of an innocent defendant.



If we go forward, we will conduct full discovery. We will patiently await trial and call our sole witness, Ms. Pauline Conley, to the stand to explain she did not violate the law – as she tried to tell you herself in November 2016.

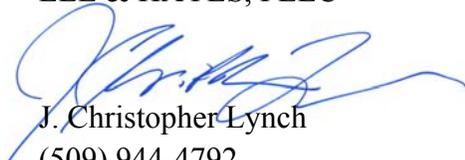
Ms. Conley will prevail. We will present our claim for fees and costs under *Fogerty* and *Perfect Ten*. We are confident Chief Judge Martinez will award full defense attorneys' fees – even though Ms. Conley's time on the stand to prove her innocence will take less than the time for the LHF credits to roll.

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

Thank you for your consideration of our position.

Very truly yours,

LEE & HAYES, PLLC



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c: Ms. Conley  
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