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6. All documents containing, evidencing or otherwise concerning (a) methods and procedures to be used and protocols to be followed for investigating, detecting and monitoring the activity alleged in the complaint, including, but not limited to validation methodology, testing procedures, failure rates and work flow methods, (b) procedures, if any, followed by MediaSentry, during its investigation of the activity alleged in the complaint, for mitigating the misidentification of IP addresses caused by IP address spoofing, (c) procedures followed by MediaSentry, during its investigation of the activity alleged in the complaint, for mitigating the effect and consequences of virus and malware infections, and/or (d) procedures followed by MediaSentry, during its investigation of the activity alleged in the complaint, for ensuring the validity and integrity of information returned by superpeers.

7. All documents evidencing, reflecting, explaining, referring to or otherwise concerning the setting, synchronization, and maintenance of clock time on the computers and servers that MediaSentry used in the investigation and detection of the activity alleged in the complaint.

8. All documents evidencing, reflecting, or otherwise concerning the amount of time that MediaSentry and its employees and agents were engaged in investigating, detecting and reporting the activity alleged in the complaint.

9. Complete digital copies of all packet logs of traffic sent to and from the measurement infrastructure and the P2P network in connection with the investigation and detection of the activity alleged in the complaint, including all packet logs of traffic sent to and from the Kazaa bootstrap superpeer and Kazaa session superpeer.

10. All documents sufficient to identify the software(s), hardware systems and other tools and devices that were used to detect and monitor the activity alleged in the complaint.

11. Digital copy of the source code of the software(s) used to detect and monitor the activity alleged in the complaint.

12. Manuals for the software(s) used to detect and monitor the activity alleged in the complaint.

13. Digital copies of all electronic files, including metadata, downloaded or accessed by MediaSentry relating to The Account.

14. Digital copies of the Kazaa or other peer to peer software program installed on the computers or servers that MediaSentry used in connection with its investigating, detecting and monitoring the activity alleged in the complaint.

15. (A) All documents identifying, evidencing, reflecting or otherwise concerning the software that was used to generate the data in Exhibit A. (B) All documents identifying, evidencing or otherwise concerning (i) the natural person or persons, if any, who generated, or caused to be generated, Exhibit A hereto, and/or (ii) the hardware used to generate, or cause to be generated, said exhibit. (C) Digital copy of the .txt file from which Exhibit A was printed. (D) Digital copies of all files whose data was used in the creation of, or incorporated into, said .txt file.

16. (A) All documents identifying, evidencing, reflecting or otherwise concerning the software that was used to generate the data in Exhibit B. (B) All documents identifying, evidencing or otherwise concerning (i) the natural person or persons, if any, who generated, or caused to be generated, the document annexed hereto as Exhibit B, and/or (ii) the hardware used to generate, or cause to be generated, said exhibit. (C) Digital copy of the .txt file from which Exhibit B was printed. (D) Digital copies of all files whose data was used in the creation of, or incorporated into, said .txt file. (E) A printout of the .txt file from which Exhibit B was printed, which sets forth all of the data in said file, including text that was cut off on the right margin of Exhibit B. (F) All documents identifying, evidencing, reflecting or otherwise concerning (i) "Rule Name: Hubcap" as referred to on the second line of page 1 of Exhibit B, (ii) "agent ID 194" as referred to on the fourth line of page 1 of Exhibit B, and/or (iii) "Scanner Name: DAYSC17" as referred to on the fourth line of page 1 of Exhibit B. (G) Digital copies of the eleven (11) files allegedly downloaded on 8/7/2004 from 6:41:26 AM to 7:08:33 AM, as set forth in Exhibit B. (H) Digital copies of the eleven (11) files for which downloads were logged on 8/7/2004 from 7:09:40 AM to 7:09:43 AM, as set forth in Exhibit B.

17. All documents identifying, evidencing, reflecting or otherwise concerning (A) the software that was used to generate the data in Exhibit C, (B) the algorithm and procedures used to generate the data in Exhibit C, (C) the natural person or persons who generated, or caused to be generated, Exhibit C and the digital version of same.

18. (A) Digital copy of the .txt file from which Exhibit C was printed. (B) Digital copies of all files whose data was used in the creation of, or incorporated into, said .txt file. (C) All documents defining or containing the definition of the term "Distinct Matches" as used in Exhibit C. (D) All documents reflecting, evidencing or otherwise concerning how the .txt file in Exhibit C came to be named "Lindor Marie-UserLog-6190165.txt". (E) All documents identifying, evidencing or otherwise concerning the person or persons who named the .txt file, from which the document annexed hereto as Exhibit C was printed, "Lindor Marie-UserLog-6190165.txt". (F) All documents reflecting, evidencing or otherwise concerning how the IP address 141.155.57.198 came to be included in the .txt file from which Exhibit C was printed.

19. Digital copies of the file(s) from which the document annexed hereto as Exhibit D was printed.

20. All other screenshots, user activity logs, and reports ever generated by MediaSentry in connection with The Account.

21. All documents identifying, evidencing, reflecting or otherwise concerning (A) the software that was used to generate the data in Exhibit E, (B) the algorithm and procedures used to generate the data in Exhibit E, and (C) the natural person or persons who generated exhibit E, or caused it to be generated.

22. (A) Digital copy of the .txt file from which Exhibit E was printed. (B) Digital copies of all files whose data was used in the creation of, or incorporated into, said .txt file. (C) All documents defining or containing the definition of the term "Distinct Matches" as used in Exhibit E. (D) All documents reflecting, evidencing or otherwise concerning (i) how the .txt file, from which Exhibit E was printed, came to be named "Lindor Marie-UserLog(Compressed)-6190165.txt", (ii) the natural person or persons who named the .txt file, from which Exhibit E was printed, "Lindor Marie-UserLog(Compressed)-6190165.txt", (iii) how the IP address 141.155.57.198 came to be included in the .txt file from which Exhibit E was printed. (E) All documents identifying, evidencing, referring to, or otherwise concerning the natural person at MediaSentry who on August 7, 2004 at 6:15 a.m. "detected an individual who was engaged in the distribution of Plaintiff's copyrighted sound recordings using the screen name jrlindor@kazaa and Internet Protocol ("IP") address 141.155.57.198," as alleged on page 5 of Exhibit F. In the event no such documents are produced indicate whether it is because the documents are unavailable, or whether it is because there was no 'detection of an individual'

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25. All documents identifying, evidencing, referring to, or otherwise concerning the date, time and location that downloaded files with respect to The Account were listened to.

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27. All documents relating to any attempts by MediaSentry, or any other person or entity, to verify the accuracy of Verizon's subpoena response, and all documents relating to the accuracy and/or synchronization of server clocks and logging instruments at Verizon, and the actual DHCP logs for that day.

28. All documents relating to any attempts by MediaSentry, or any other person or entity, to verify that any person was using an "online media distribution system" through defendant's internet access account after August 7, 2004.

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