



July 11, 2014

Legal Compliance  
TXD01613  
2701 S. Johnson St.  
San Angelo, TX 76904  
Voice: 888-483-2600  
Fax 325-949-6916

YOUNES [REDACTED]  
[REDACTED]  
PLANTATION FL 33322

**Verizon Case #: 14149332**  
**Docket / File #: [REDACTED]**

COMMONWEALTH OF VIRGINIA)

ss:

COUNTY OF LOUDOUN)

I, Thomas E Felty-Smith being duly sworn, depose and say:

1. I am the custodian of records for Verizon, and in that capacity, I certify that the attached 1 pages of records are true and accurate copies of the records created from the information maintained by Verizon in the actual course of business
2. It is Verizon's ordinary practice to maintain such records, and that said records were made contemporaneously with the transaction and events stated therein, or within a reasonable time thereafter.

THOMAS E FELTY-SMITH  
VERIZON LEGAL COMPLIANCE

Sworn to before me this 11th day of July, 2014

*Laura R. Barron*  
Notary Public

Laura R Barron  
NOTARY PUBLIC  
Commonwealth of Virginia  
Reg. # 7231254  
My Commission Expires June 30, 2016





July 11, 2014

Legal Compliance  
TXD01613  
2701 S. Johnson St.  
San Angelo, TX 76904  
Voice: 888-483-2600  
Fax 325-949-6916

Re: Criminal Court of the City of New York – New York County: Part A, Subpoena, dated, May 19, 2014, [REDACTED] (Verizon Case: 14149332)

The Verizon account(s) below was/were assigned the IP address(s) for the date(s) and time(s) requested in the above referenced legal document.

**IP Address:** 100.2.151.26  
  
Account Creation Date: 09/14/2012  
Customer Name: BRIAN ALBRO  
Account Address: 405 MAIN APT V  
MANHATTAN, NY 100440000  
Primary TN: 3478201840

Type	User ID	User Name
Primary	vze1aqwcb	hoohoobka

\*\*\*\*\*

**IP Address:** 108.41.173.250  
  
Account Creation Date: 09/14/2012  
Customer Name: BRIAN ALBRO  
Account Address: 405 MAIN APT V  
MANHATTAN, NY 100440000  
Primary TN: 3478201840

Type	User ID	User Name
Primary	vze1aqwcb	hoohoobka

\*\*\*\*\*END OF RECORDS\*\*\*\*\*



VERIZON LEGAL COMPLIANCE  
2701 S. JOHNSON ST.  
SAN ANGELO TX 76904  
Phone: 888-483-2600 Fax: 325-949-6916

December 11, 2014

DISTRICT ATTORNEY NEW YORK COUNTY  
ONE HOGAN PLACE  
NEW YORK NY 10013

Re: New York County, New York, Criminal Court (Part A) Trial Subpoena, Dated December 10, 2014, and in the Matter of Case No.: [REDACTED], the People of New York against Younes [REDACTED] (Verizon Case: 14235714)

STATE OF VIRGINIA )

ss:

COUNTY OF LOUDOUN)

I, REX LOONEY, being duly sworn, depose and say:

1. I am the custodian of records for Verizon, and in that capacity, I certify that the attached 2 pages of records are true and accurate copies of the records created from the information maintained by Verizon in the actual course of business
2. It is Verizon's ordinary practice to maintain such records, and that said records were made contemporaneously with the transaction and events stated therein, or within a reasonable time thereafter.

  
\_\_\_\_\_  
REX LOONEY  
CSLT-NETWORK OPERATIONS  
Verizon Legal Compliance



December 11, 2014

Legal Compliance  
TXD01613  
2701 S. Johnson St.  
San Angelo, TX 76904  
Voice: 888-483-2600  
Fax 325-949-6916

Re: New York County, New York, Criminal Court (Part A) Trial Subpoena, Dated December 10, 2014, and in the Matter of Case No. [REDACTED], the People of New York against Younes [REDACTED] (Verizon Case: 14235714)

.....

[REDACTED]

[REDACTED]

.....

[REDACTED]

[REDACTED]

.....

[REDACTED]

[REDACTED]

.....

**Session Details (Times Are GMT/UTC-0000)**

<b>IP Address:</b>	<b>108.30.44.135</b>
Start Time:	2013-08-13 21:15:20Z
Stop Time:	2013-09-30 09:28:28Z
Duration:	47d 12h 13m 8s

<b>IP Address:</b>	<b>108.30.77.249</b>
Start Time:	2013-09-30 15:08:28Z
Stop Time:	2013-11-22 06:51:58Z
Duration:	52d 12h 1m 29s



**IP Address:** 96.246.185.134  
**Start Time:** 2013-11-22 06:01:01Z  
**Stop Time:** 2014-01-23 15:06:36Z  
**Duration:** 62d 9h 5m 35s

**IP Address:** 108.41.186.86  
**Start Time:** 2014-01-24 17:57:55Z  
**Stop Time:** 2014-03-31 16:06:43Z  
**Duration:** 65d 22h 8m 48s

**IP Address:** 108.14.227.44  
**Start Time:** 2014-04-01 13:36:47Z  
**Stop Time:** 2014-04-11 14:37:46Z  
**Duration:** 10d 1h 0m 59s

**IP Address:** 74.108.115.49  
**Start Time:** 2014-04-13 01:02:12Z  
**Stop Time:** 2014-07-20 22:03:18Z  
**Duration:** 98d 21h 1m 6s

The following subscriber was assigned the above IP addresses on the dates and times shown.

**Subscriber Information**

**VOL Account Number:** 0128242251026  
**Customer Name:** BRIAN ALBRO  
**Account Address:** 405 MAIN APT N  
MANHATTAN, NY 100440000  
**Daytime TN:** 7732082118  
**Email:** BKALBRO@YAHOO.COM

Type	User ID	User Name
Primary	vze1aqwcb	hoohoobka

\*\*\*\*\*END OF RECORDS\*\*\*\*\*

# ProxySolutions, LLC

February 17, 2014

Mr. Younes [REDACTED]

Re: Subpoena to Produce Information in [REDACTED] v. *Google, et. al.* (13-1522-RGA)

Dear Mr. [REDACTED],

Please accept this correspondence as the response by Proxy Solutions LLC and RapidSwitch to your subpoena in [REDACTED] v. *Google, et. al.* (13-1522-RGA). We do not allow any malicious activity in our network and take abuse complaints very seriously.

We had been maintaining the server with IP address in question at the time of the issue (April 7th, 2013 (14:56:24 BST)). We were able to find the following record in the logs, indicating that an email had been dispatched on that date from the @yahoo email address:

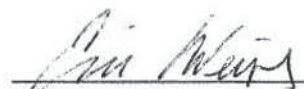
1365342986.263 545 100.2.151.26 TCP\_MISS/200 7635 CONNECT  
us.bc.yahoo.com:443 pp-skillnag DIRECT/87.248.121.190 -

This user account (pp-skillnag) belongs to a "Brian Albro", who provided the following email during account creation: adamchance858@yahoo.co.uk. The logs indicate that the user was connecting from the following IP address: 100.2.151.26 (pool-100-2-151-26.nycmny.fios.verizon.net).

In this particular case, Brian Albro subscribed to our services, paid using his PayPal account and received a unique username in our system (pp-skillnag). He then configured his computer to send traffic through our proxy server, including the e-mail sent through his Yahoo account. (That was why email headers contained the IP address of our server (78.129.190.54), not his computer IP (100.2.151.26)). Below is the information identifying the PayPal account that was used to pay us:

Payment Date: 04:03:50 Apr 06, 2013 PDT  
Subscription ID: S-65942043WL7274003  
Transaction ID: 38104122KC949923L  
Payer ID: UVSDJ337EMERE  
Email: adamchance858@yahoo.co.uk  
Amount: 12.00 USD

The logs and records containing the above information are being preserved, per your request.

  
By: Eric Weiss  
For Proxy Solutions LLC and RapidSwitch

2/17/2014  
Date

COMMONWEALTH OF PENNSYLVANIA )  
 ) SS.  
COUNTY OF Lehigh )

**ERIC WEISS ACKNOWLEDGEMENT OF  
COMPANY RECORDS AND INFORMATION**

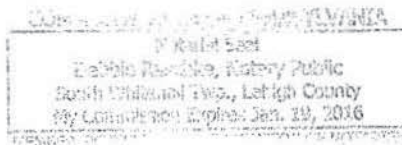
I, ERIC WEISS, do hereby certify that the foregoing information provided is a correct and accurate reflection of the records and logs of Proxy Solutions LLC and RapidSwitch.

2/17/2014      *Eric Weiss*  
DATE                      SIGNATURE

On this, the 17<sup>th</sup> day of February, 2014, before me a notary public, the undersigned officer, personally appeared ERIC WEISS, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that he executed the same for the purposes therein contained.

My commissions expires: Jan 19, 2016

*Denise Roscoe*  
Notary Public



## YAHOO! ACCOUNT MANAGEMENT TOOL

Login Name: **adamchance858**  
GUID: **KPJVQDOSCMYTGWXP4MBKT47QU**  
Yahoo Mail Name: **adamchance858@yahoo.co.uk**  
Registration IP address: **100.2.151.26**  
Account Created (reg): **Sat Mar 30 00:13:20 2013 GMT**  
Other Identities: **adamchance858**  
Full Name **Adam Chance**  
Address1:  
Address2:  
City:  
State, territory or province:  
Country: **United Kingdom**  
Zip/Postal Code: **W1D4UB**  
Phone:  
Time Zone: **+0**  
Birthday: **February 18, 1950**  
Gender: **Male**  
Occupation:  
Business Name:  
Business Address:  
Business City:  
Business State:  
Business Country: **uk**  
Business Zip:  
Business Phone:  
Business Email:  
Additional IP Addresses: **Sat Mar 30 00:13:20 2013 GMT 100.2.151.26**  
Account Status: **Active**



# YAHOO! ACCOUNT MANAGEMENT TOOL

Login Name: **messagetoyounes**

GUID: **WFBE2PKNLE45TCDOFOD453JNKI**

Yahoo Mail Name: **messagetoyounes@yahoo.ie**

Alternate Communication Channels: **masterb983@yahoo.com** *Verified*

Registration IP address: **78.129.190.54**

Account Created (reg): **Sat Apr 6 20:22:55 2013 GMT**

Other Identities: **messagetoyounes**  
**messagetoyounes@yahoo.ie (Yahoo! Mail)**

Full Name **Message to Younes**

Address1:

Address2:

City:

State, territory or province:

Country: **United Kingdom**

Zip/Postal Code: **EC2N4AY**

Phone:

Time Zone: **+0**

Birthday: **January 1, 1974**

Gender: **Male**

Occupation:

Business Name:

Business Address:

Business City:

Business State:

Business Country: **uk**

Business Zip:

Business Phone:

Business Email:

Additional IP Addresses: **Sat Apr 6 20:22:55 2013 GMT** **78.129.190.54**

Account Status: **Active**

**Subscriber Information**

<b><u>Yahoo Id</u></b>	simpsonmark@ymail.com
<b><u>Name</u></b>	Mark Simpson
<b><u>Billing Address Line1</u></b>	450 W 42nd Street
<b><u>Billing Address Line2</u></b>	Apt. 21B
<b><u>Billing City</u></b>	New York
<b><u>Billing State</u></b>	NY
<b><u>Billing Postal Code</u></b>	10036
<b><u>Billing Country</u></b>	US
<b><u>Billing Phone</u></b>	212 758 1782
<b><u>Customer Phone</u></b>	
<b><u>Email</u></b>	simpsonmark@ymail.com
<b><u>Service</u></b>	Email, Domains

**BUSINESS RECORDS DECLARATION**

Request for information regarding: )  
messagetoyounes@yahoo.com, et al. )  
\_\_\_\_\_ )

**DECLARATION OF  
OLHA TOKALENKO**

I, Olha Tokalenko, declare:

1. I am a Custodian of Records for Yahoo! Inc. ("Yahoo"), located in Sunnyvale, California. I am authorized to submit this declaration on behalf of Yahoo. I make this declaration pursuant to the Federal Rules of Evidence Rule 902(11) and the California Code of Evidence section 1561 and in response to a subpoena dated January 24, 2014 ("the request"). I have personal knowledge of the following facts, except as noted, and could testify competently thereto if called as a witness.
2. Attached hereto are 2 pages that contain true and correct copies of the following data pertaining to the user accounts identified in the request: (1) the user profile, as produced by the Yahoo Account Management Tool. Yahoo's servers record this data automatically at the time, or reasonably soon after, it is entered or transmitted, and this data is kept in the course of this regularly conducted activity and was made by regularly conducted activity as a regular practice. Yahoo may not require or verify user information because it offers many of its services to users for free.
3. To the extent any document attached hereto contained information that exceeded the scope of the request, is protected from disclosure, or is otherwise not subject to production, such information has been redacted or otherwise removed.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

DATED: February 19, 2014

  
\_\_\_\_\_  
Olha Tokalenko, Custodian of Records

**RESPONSES TO SPECIFIC DOCUMENT REQUESTS**

**Request No. 1 (unnumbered):**

Please provide all information in your possession concerning the following Wordpress hosted accounts:

<http://www.novelsofmssimpson.com>

<http://en.gravatar.com/avoirunevie>

<http://msimpsondotorg.wordpress.com/about>

<http://fr.wordpress.com/tag/shirtless-in-iceland>

<http://fr.wordpress.com/tag/m-s-simpson>

<http://fr.wordpress.com/tag/le-bon-marche>

<http://elementalprofundity.com>

The owner(s) of these accounts have been stalking/threatening/defaming Plaintiff since 2009, as described in case no 13-1522-RGA. Due to the fact that the account holder(s) are accusing Plaintiff of hacking these accounts, it is therefore necessary for you to obtain all technical information, including IP/Mac addresses, TCP/IP information (if available) for all logins, posts, messages and any other transaction for which you record this information, and basically every single facet of technical data that you record worldwide concerning these accounts.

**Response to Request No. 1:**

Automatic incorporates its General Objections set forth above. Automatic further objects to this request to the extent it requests information that is protected from disclosure by the attorney-client privilege, work-product doctrine, First Amendment, E.C.P.A., or other constitutional, statutory or common law privilege. Automatic further objects to this request to the extent it seeks tags rather than actual blogs. See <http://en.support.wordpress.com/posts/categories-vs-tags/>.

Subject to and without waiving the foregoing objections, Automatic responds as follows:

Blog URL: [elementalprofundity.wordpress.com](http://elementalprofundity.wordpress.com)

Previous email: [ange\\_egoiste@yahoo.fr](mailto:ange_egoiste@yahoo.fr)

Current email: [luke\\_winterborne@yahoo.fr](mailto:luke_winterborne@yahoo.fr)



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Creation date: 2013-11-23 18:19:57 UTC

Creation IP address: 92.243.22.18

Additional IP addresses:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Billing address:

31 Rue es Blanc-Manteaux

Address 2: Etage 2

Paris 75004

FR

+1.2127526570

Blog URL: novelsofmssimpson.wordpress.com

Previous email: ange\_egoiste@yahoo.fr

Current email: luke\_winterborne@yahoo.fr

Creation date: 2013-09-10 11:59:08 UTC

Creation IP address: 92.243.22.18

Additional IP addresses:

[REDACTED]  
[REDACTED]  
[REDACTED]

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**Billing address:**  
31 Rue es Blanc-Manteaux  
Address 2: Etage 2  
Paris 75004  
FR  
+1.2127526570

Blog URL: msimpsondotorg.wordpress.com  
Blog creator email: simpsonmark@ymail.com  
Creation date: 2011-08-03 23:26:26 UTC  
Creation IP address: 108.6.2.98

**Request No. 2 (unnumbered):**

Also provide copies of all posts/messages/comments made to any of these sites, including posts/messages/comments which were deleted, and posts/messages/comments which were made during any time period when any of these blogs were made private.

**Response to Request No. 2:**

Automatic incorporates its General Objections set forth above. Automatic further objects to this request to the extent it requests information that is protected from disclosure by the attorney-client privilege, work-product doctrine, First Amendment, or other constitutional, statutory or common law privilege. Automatic specifically objects to this request pursuant to the ECPA, 18 U.S.C. § 2702, which prohibits production of stored content.

**Request No. 3 (unnumbered):**

1 Please also provide a list of the IPs/emails of all blog followers which have subscribed to  
2 any of these accounts.

3 **Response to Request No. 3 (unnumbered):**

4 Automatic incorporates its General Objections set forth above. Automatic further objects  
5 to this request to the extent it requests information that is protected from disclosure by the  
6 attorney-client privilege, work-product doctrine, First Amendment, E.C.P.A., or other  
7 constitutional, statutory or common law privilege. Automatic further objects to this request as it is  
8 overly broad and not likely to be relevant to any party's claim or defense.

9 **Request No. 4 (unnumbered):**

10 Please also provide any information concerning financial transactions, purchases made on  
11 your system, and methods of payment to further identify the owners/operators of these accounts.

12 **Response to Request No. 4:**

13 Automatic incorporates its General Objections set forth above. Automatic further objects  
14 to this request to the extent it requests information that is protected from disclosure by the  
15 attorney-client privilege, work-product doctrine, First Amendment, E.C.P.A., or other  
16 constitutional, statutory or common law privilege.

17 Subject to and without waiving the foregoing objections, Automatic responds as follows:

- 18 1. Transaction number 2AE32361WW071505H --User bought WordPress.com Premium  
19 for <http://elementalprofundity.wordpress.com> (Paid with US Credit Card via PayPal  
20 Direct by "Mark Simpson") 2013-11-23 18:57:44 \$79.00
- 21 2. Transaction number 23E21533U2058323E --user bought Thème Premium: A Simpler  
22 Time forr <http://elementalprofundity.wordpress.com> (Paid with US Credit Card via  
23 PayPal Direct by "Mark Simpson") 2013-11-23 18:31:35 \$60.00
- 24 3. Transaction number 9CL92056FH1325814  
25 Private Whois: elementalprofundity.com  
26 Domain registered: elementalprofundity.com  
27 Domain mapped: elementalprofundity.com



1 (Paid with US Credit Card via PayPal Direct by "Mark Simpson") 2013-11-23 18:25:18  
2 \$26.00

3 4. Transaction number 80S175648M305164N -- user bought Thème Premium:  
4 Organization for <http://novelsofmssimpson.wordpress.com> (Paid with US Credit Card  
5 via PayPal Direct by "Mark Simpson") 2013-09-26 13:37:29 \$69.00 \$69.00  
6 (refunded in transaction: 7XH34362UG886593T)

7 5. Transaction number 52H55517AC086411B --user bought Thème Premium: On  
8 Demand for <http://novelsofmssimpson.wordpress.com> (Paid with US Credit Card via  
9 PayPal Direct by "Mark Simpson") 2013-09-26 13:01:48 \$75.00 (\$75.00  
10 refunded in transaction: 1TL8712931576461M)

11 6. Transaction number 5ME339999A2994843 --user bought Premium Theme: A Simpler  
12 Time for <http://novelsofmssimpson.wordpress.com> (Paid with US Credit Card via  
13 PayPal Direct by "Mark Simpson") 2013-09-12 23:23:13 \$60.00  
14 7. Transaction number 9CX878744W165994M --user bought Premium Theme: Linen for  
15 <http://novelsofmssimpson.wordpress.com> (Paid with US Credit Card via PayPal Direct  
16 by "Mark Simpson") 2013-09-10 16:12:10 \$79.00 (\$79.00 refunded in  
17 transaction: 2V593271GT159070B)

18 8. Transaction number 9AE1233965773043D --user bought Premium Theme: Publisher  
19 for <http://novelsofmssimpson.wordpress.com> (Paid with US Credit Card via PayPal  
20 Direct by "Mark Simpson") 2013-09-10 13:59:40 \$75.00 (\$75.00 refunded in  
21 transaction: 611283967V677344G)

22 9. Transaction number 1MF613493V275683R --user bought Custom Design for  
23 <http://novelsofmssimpson.wordpress.com> (Paid with US Credit Card via PayPal Direct  
24 by "Mark Simpson") 2013-09-10 12:34:55 \$30.00

25 10. Transaction number 7FP584976R808004M  
26 Private Whois: [novelsofmssimpson.com](http://novelsofmssimpson.com)  
27 Domain registered: [novelsofmssimpson.com](http://novelsofmssimpson.com)  
28 Domain mapped: [novelsofmssimpson.com](http://novelsofmssimpson.com)



1 (Paid with US Credit Card via PayPal Direct by "Mark Simpson")

2 2013-09-10 12:03:08 \$26.00

3 **Request No. 5 (unnumbered):**

4 Please also terminate the user(s) access to your facilities due to their involvement with  
5 terrorism, at least while the litigation is pending, or in the alternative, please institute enhanced  
6 security/monitoring/data collection protocols upon all these sites to continue to track any potential  
7 hacking activity for further production requests if they become necessary.

8 **Response to Request No. 5:**

9 Automatic incorporates its General Objections set forth above. Automatic further objects  
10 to this request to the extent it requests information that is protected from disclosure by the  
11 attorney-client privilege, work-product doctrine, First Amendment, E.C.P.A., or other  
12 constitutional, statutory or common law privilege. Automatic further objects as this is not a  
13 proper request pursuant to F.R.C.P. 45.

14 Dated: December 30, 2013

Respectfully submitted,

15  
16  
17 By: 

18 Melinda M. Morton  
19 PROCOPIO, CORY, HARGREAVES  
20 & SAVITCH LLP  
21 *Attorneys for Non-Party*  
22 AUTOMATTIC INC.  
23  
24  
25  
26  
27  
28