

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

MALIBU MEDIA, LLC,)	
)	
Plaintiff,)	Civil Action No.
)	8:14-cv-02138-VMC-MAP
v.)	
)	
WILLIAM SHARP,)	
)	
Defendant.)	
)	

**DECLARATION OF BENJAMIN J. FOX IN SUPPORT OF VERIZON ONLINE
LLC'S MOTION FOR PROTECTIVE ORDER**

I, Benjamin J. Fox, state and declare:

1. I am an attorney and partner in Morrison & Foerster LLP, counsel for Verizon Online LLC in connection with a series of "Doe" defendant copyright infringement cases involving sexually explicit films and seeking information about Verizon's subscribers. I have personal knowledge of the facts stated herein, and if called upon to do so, I could testify competently to them.

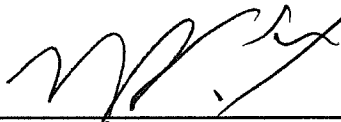
2. I have reviewed the federal courts' ECF / PACER report for filings from January 1, 2015 to October 2, 2015 involving Malibu Media LLC. Based on this review, it appears that Malibu Media has filed more than 1,500 lawsuits so far this year.

Attached hereto as **Exhibit A** is a true and correct copy of a spreadsheet generated from

PACER's court records that reflects the lawsuits filed by Malibu Media LLC from January 1 to October 2, 2015.

3. Verizon served on September 28, 2015 written objections to Malibu Media's recent subpoena to Verizon, a true and correct copy of which is attached hereto as **Exhibit B**. As reflected in the Proof of Service, the objections were served on all counsel of record in the above-captioned action.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed on October 5, 2015 in Los Angeles, California.



Benjamin J. Fox