

Attorney for Plaintiff

Defendant Pro Se

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
NEWARK VICINAGE

Malibu Media LLC,

Plaintiff,

vs.

Defendant.

) Case No.

) **Answers to Plaintiff's First**
) **Set of Interrogatories**

1. Objection A: Defendant disagrees in whole or in part with the relevant definitions supplied by Plaintiff and their Attorney. Defendant maintains that definitions supplied are purposely designed by Plaintiff's Attorney to be self serving rather rather than universally accepted.

Objection B: Defendant invokes his First Amendment Right to Free Speech, which includes his Right Not to Speak or Express himself.

Objection C: Defendant invokes his Fourth Amendment Right.

Objection D: Defendant invokes his Fifth Amendment Right.

Objection E: Defendant invokes his Thirteenth Amendment Right, specifically the protections against involuntary servitude, which protects an individual from being forced to work against his will.

Objection F: Defendant invokes his right to medical privacy as codified in HIPAA.

Objection G: Defendant invokes Doctor/Patient Confidentiality.

Objection H: Defendant invokes Attorney/Client Privilege.

Defendant invokes his right against "Adverse Inference", as codified in Carter v. Kentucky when The Supreme Court held that a criminal Defendant remaining silent at trial has the right to a jury instruction that his silence is not evidence of his guilt.

Defendant summarily invokes severally and jointly, all the Rights outlined.

2. Defendant repeats and reasserts Answer 1, in its entirety.

3. Defendant repeats and reasserts Answer 1, in its entirety.

4. Defendant repeats and reasserts Answer 1, in its entirety, with the sole exception being to point out that the time period in controversy is September 2016 to January 2018 and not August 16 2017 to August 22 2018, as Interrogatory 4 implies.

5. Defendant repeats and reasserts Answer 1, in its entirety.

6. Defendant repeats and reasserts Answer 1, in its entirety.

7. Defendant repeats and reasserts Answer 1, in its entirety.

8. Defendant repeats and reasserts Answer 1, in its entirety.

9. Defendant repeats and reasserts Answer 1, in its entirety.

10. Defendant repeats and reasserts Answer 1, in its entirety.

11. Defendant repeats and reasserts Answer 1, in its entirety.

12. Defendant repeats and reasserts Answer 1, in its entirety.

13. Defendant repeats and reasserts Answer 1, in its entirety, with the sole exception being to point out that Interrogatory 13 makes reference to the wrong Interrogatory that preceded it.

14. Defendant repeats and reasserts Answer 1, in its entirety.

15. Defendant repeats and reasserts Answer 1, in its entirety and also invokes the protections afforded Defendant by 47 U.S. Code § 551.

16. Defendant repeats and reasserts Answer 1, in its entirety.

17. Defendant repeats and reasserts Answer 1, in its entirety.

18. Defendant repeats and reasserts Answer 1, in it's entirety.

19. Defendant repeats and reasserts Answer 1, in it's entirety.

20. Defendant repeats and reasserts Answer 1, in it's entirety.

21. Defendant repeats and reasserts Answer 1, in it's entirety.

22. Defendant repeats and reasserts Answer 1, in it's entirety.

23. No.

24. Yes. Plaintiff's unlicensed "investigators", as outlined in Plaintiff's Disclosures and Amended Complaint. In fact, all the evidence presented so far points to Plaintiff's unlicensed "investigators" being the only ones actively engaged in the practice of downloading and distributing copyrighted content via BitTorrent.