

Attorney for Plaintiff

Defendant Pro Se

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
NEWARK VICINAGE

Malibu Media LLC,)	Case No.
<i>Plaintiff,</i>)	Answers to Plaintiff's First
vs.)	Set of Requests for
)	Production
)	
)	
<i>Defendant.</i>)	

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 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 Objections A through E, inclusive, as well as his right against Adverse Inference.

3. Defendant repeats and reasserts Objections A through E, inclusive, as well as his right against Adverse Inference.

4. Defendant repeats and reasserts Objections A through E, inclusive, as well as his right against Adverse Inference.

5. Defendant repeats and reasserts ALL Objections from Response 1.

6. Defendant repeats and reasserts ALL Objections from Response 1.

7. Defendant repeats and reasserts Objections A through E, inclusive, as well as his right against Adverse Inference.

8. Defendant repeats and reasserts ALL Objections from Response 1.

9. Defendant repeats and reasserts ALL Objections from Response 1, as well as invokes the protection afforded by 47 U.S. Code § 551 and 47 U.S. Code § 222.

10. Defendant repeats and reasserts ALL Objections from Response 1, with the sole exceptions being to point out that the time frame of controversy is September 2016 to January 2018, not November 9 2017 by itself and to point out that Request For Production 10 contains a circular reference to itself.

Defendant also directs Plaintiffs and their attorney to review Defendant's Motion to Dismiss, where Defendant, in painstaking detail, explains why Plaintiff's IP address "evidence" is fundamentally flawed.

11. Defendant repeats and reasserts ALL Objections from Response 1.

Defendant also directs Plaintiffs and their attorney to review Defendant's Motion to Dismiss, where Defendant, in painstaking detail, explains why Plaintiff's IP address "evidence" is fundamentally flawed.

12. Defendant repeats and reasserts ALL Objections from Response 1 and adds that this type of information, in addition to the protection afforded Defendant as

outlined in Response 1, is also protected by 47 U.S. Code § 551 and 47 U.S. Code § 222.

13. Defendant repeats and reasserts ALL Objections from Response 1.

14. Defendant repeats and reasserts ALL Objections from Response 1.

15. Defendant repeats and reasserts ALL Objections from Response 1.

16. Defendant repeats and reasserts ALL Objections from Response 1.

17. Defendant repeats and reasserts ALL Objections from Response 1.

18. Defendant repeats and reasserts ALL Objections from Response 1.

19. Defendant repeats and reasserts ALL Objections from Response 1.

20. Defendant repeats and reasserts ALL Objections from Response 1, and adds that any information of this type is further protected by Federal and NJ State Consumer Privacy Laws.

21. Defendant repeats and reasserts ALL Objections from Response 1.

Defendant also directs Plaintiffs and their attorney to review Defendant's Motion to Dismiss, where Defendant, in painstaking detail, explains why Plaintiff's IP address "evidence" is fundamentally flawed.

22. Defendant repeats and reasserts ALL Objections from Response 1.

Defendant also directs Plaintiffs and their attorney to review Defendant's Motion to Dismiss, where Defendant, in painstaking detail, explains why Plaintiff's IP address "evidence" is fundamentally flawed.

23. While Defendant repeats and reasserts ALL Objections from Response 1, Defendant asserts that a final decision has not been made regarding employing all available methods of defending this lawsuit, consequently these documents will not come into existence until after The Court rules on Defendant's Motion to Dismiss, and in the event said motion fails, until after the March XX 2019 in-person status conference ordered by The Court.

The above notwithstanding, said documents will likely include all or most of the following:

Letter requesting The U.S. Copyright Office invalidates/revokes the registrations of ALL Plaintiff's "works", not just the 13 that are the subject of this lawsuit, on the basis that production of Plaintiff's works is in violation of Part 1, Title 15, Chapter 2, 647, Penal Code of California as well as violations of 18 USC 2422(a) and 22 U.S. Code § 7102.

Letters to the California State Attorney General and the U.S. Attorney General for the appropriate California District requesting they investigate Plaintiffs for violations of California and U.S. prostitution laws in the production of the content Plaintiff's profit from.

Letters to the New Jersey State Police and New Jersey Attorney General requesting the investigate Plaintiffs and the "Investigators" they employ for violations of state and federal wiretapping laws as well as violations of the NJ Private Detective Act and any other applicable laws that govern licensing and limitations of those that offer services for the collection of "evidence".

Letters to the National Center on Sexual Exploitation, the Religious Alliance Against Pornography and Fight The New Drug asking them to join Defendant's attempt to have Plaintiff's copyright registrations invalidated, as well as Defendant's attempt to have Plaintiff's and their "Investigators" criminally investigated.

Letters to the editorial sections of various media outlets to shine light on the activities of Plaintiffs as they relate to violations of state and federal prostitution laws and their attempts to profit from said content not by selling it but by abusing the legal system to extract settlements orders of magnitude higher than they make by selling subscriptions to their websites.

Letters to the offices of various prosecutors asking them to look for RICO violations by Plaintiffs, their Investigators and the attorneys that represent them as a result of the thousands of lawsuits filed around the country based on the faulty, flimsy, "evidence" collected by a single company based in Germany, that does not comply with state and federal data collection laws.

A complaint to the Bar Association for attempts made during this lawsuit to deceive Defendant.

However, since a final decision has not been made regarding the above defense strategies, the documents do not exist, yet.

24. For clarity, Defendant repeats:

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

Defendant invokes his Fourth Amendment Right.

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.

Defendant summarily invokes severally and jointly, all the constitutionally protected rights outlined, which include Defendant's Right Not to Speak, Defendant's Right against being forced to testify against himself, Defendant's Right against being forced to produce any evidence, particularly any evidence that Plaintiff may misconstrue or misrepresent to a Judge and or Jury, Defendant's Right against being forced to work.

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

Defendant invokes Doctor/Patient Confidentiality.

Defendant invokes Attorney/Client Privilege.

Defendant also 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 asserts that all hard drives in his possession are encrypted using a custom designed math formula that needs to be solved in order to derive a passkey that decrypts the hard drives in question.

In addition to the data the hard drives contain being protected by the First, Fourth and Firth Amendments, as well as Attorney/Client Privilege, Doctor/Patient Confidentiality, HIPAA and other privacy laws, Defendant asserts that he can not legally be forced to decrypt said hard drives because the passcode is too complex to remember, it must be generated by solving a math formula, of the Defendant's own design; an Order compelling Defendant to decrypt any and all hard drives in his possession would violate the Thirteenth

Amendment's protections against forced involuntary servitude.

Similarly an Order compelling Defendant to reveal the formula so that someone else can solve it, would violate Defendant's First Amendment Rights to Free Speech, which include his Right not to Speak, Defendant Fourth and Fifth Amendment Rights, Defendant's right to privacy under HIPAA, Attorney/Client Privilege, Doctor/Patient Confidentiality, as well as Defendant's copyrights under U.S. Copyright Law; also since the math formula that Defendant designed is an "original work or authorship", it qualifies for protection under the Copyright Act.