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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 REZA GANJAVI,) **Case Number:**
11) CV05- 8619 DDP (JWJx)
12) **Complaint for:**
13 **Plaintiff,**)
14 v.) 1. Identity Theft, 18 U.S.C. §
15) 1028
16 DOES 1 through 10,) 2. Violations of the Lanham
17 Douglas Carlson,) Act, 15 U.S.C. § 1125
18 William Jennings,) 3. Invasion of Privacy: False
19 Todd Tipton,) Light
20) 4. Defamation Per Se
21) 5. Defamation
22) 6. Invasion of Privacy:
23) Appropriation of Name or
24) Likeness
25 **Defendants.**) 7. Negligent and Intentional
26) Infliction of Emotional
27) Distress
28) 8. Intentional Interference
with Prospective Economic
Advantage
9. Unfair Competition
10. Infringement of Copyright
17 U.S.C. § 501
11. Transportation of Obscene
Matters 18 U.S.C. § 1462
12. Injunctive Relief

1 COMES NOW, Plaintiff, REZA GANJAVI, and, as against each of the
2 Defendants named herein, respectfully complains, avers and alleges as
3 follows:

4
5 **JURISDICTION**

6
7 1. This action arises under four (4) Federal Statutes and other laws,
8 including the Identity Theft and Assumption Deterrence Act of 1998 (18
9 U.S.C. § 1028 amended). This Honorable Court has jurisdiction thereunder.

10
11 **SYNOPSIS**

12
13 2. Plaintiff is a record producer and classical musician who has produced
14 some very successful CD's in the Classical Guitar genre. He has attracted
15 the envy and hostility of certain individuals on a Classical Guitar Internet
16 group. The Defendants have broken a number of laws by attacking the
17 Plaintiff and his business in several vulgar, uncivil, profane, and highly
18 damaging manners, apparently motivated by jealousy, prejudice, and causeless
19 hatred. In performing these above actions the Defendants evidenced malice,
20 fraud, oppression, calculated falsehoods, and disregard for the rights and
21 safety of the Plaintiff. Plaintiff did everything to avert legal action but
22 Defendants opted otherwise.

23 3. In summary,

- 24 a) Defendants attempted to assassinate Plaintiff's character;
25 b) Defendants committed numerous counts of identity theft / fraudulent
26 use of Plaintiff's identity;
27 c) Defendants fraudulently published material using the Plaintiff's email
28 and name including threatening others with fatal violence, using

1 racial slurs against Blacks, and sympathizing with violent, extremist
2 criminals and ideologies;

3 d) Defendants setup mock websites to damage Plaintiff's business and
4 reputation;

5 e) Defendants published fictitious, forged, altered material which were
6 falsely attributed to the Plaintiff as the author;

7 f) Defendants published material which placed the Plaintiff in a highly
8 offensive light;

9 g) Defendants copied and published Plaintiff's work without his
10 permission;

11 h) And other acts which are explained hereinafter and backed by almost
12 100 pages of evidence (Exhibit 5).

13
14 **PLAINTIFF BACKGROUND AS RELATED TO THE CASE**

15
16 4. Plaintiff, REZA GANJAVI is, and at all relevant times was, a classical
17 guitarist, singer, record producer, and promoter whose music is sold in the
18 form of compact disks (CD's) and digital files. His CD's are marketed world-
19 wide on the Internet through his own website: www.rezamus.com, other
20 online shops, and certain brick-and-mortar record shops. Plaintiff's most
21 famous CD is entitled "In Friendship" (Exhibit 1) and it was deemed as a
22 best seller in the Classical Guitar genre. Plaintiff's second CD is entitled
23 "Dancing Hands" (Exhibit 1) and it includes guest artists such as the
24 renowned classical recorder player Maurice Steger. The success of his CD's
25 are reflected in hundreds of pages of listener comments which are posted on
26 the Plaintiff's website. He also produces records for other artist (e.g.,
27 www.angeloangelo.com).

1 5. Plaintiff travels extensively throughout the world, performing and
2 meeting people. He believes his work stands for friendship, dialogue, peace,
3 harmony, understanding, cooperation, cultural exchange, equality of all
4 people, and other positive values. Plaintiff has always condemned acts of
5 violence and incivility.

6
7 6. Plaintiff was born in Tehran, Iran and lived in the USA since age 15
8 where he obtained *magna-cum-laude* Bachelors in Computer Science and
9 Philosophy, and an MBA from major California universities. He worked
10 extensively in Information Technology before pursuing a full-time music
11 career serving world-class private, public, government, and non-profit
12 organizations. He studied the music privately since an early age with
13 teachers including some of the most famous guitarists in the world.

14
15 7. Plaintiff has never sued anybody nor has he ever been sued. He has
16 always strived to resolve differences peacefully and in this case too;
17 towit, he pleaded numerous times to the Defendants to stop their violations
18 and to come forward to resolve the matter peacefully. But the pleas were
19 viewed as sign of weakness and were reciprocated by insults (reference: rmcg
20 #233583, #234325). Plaintiff did everything in his power to avert having to
21 take this legal action, as he believes, and it has proven, that it takes
22 tremendous energy, health, time, and money to litigate, and such resources
23 could be put to better use, for creative, productive, humanitarian, and
24 charitable efforts. Plaintiff hopes that this case will serve as yet another
25 example that Cyber abuse will not go unpunished, a fact that many Internet
26 abusers still do not grasp.

1 8. Despite having had the technical skills, the Plaintiff did not try to
2 get even with the Defendants on their terms and did not do anything uncivil
3 in response to the Defendants' violations, in line with Einstein's belief
4 that "you can never solve a problem on the level on which it was created".
5

6 9. References regarding Plaintiff's performances and recordings (over 100
7 pages of listener comments), as well as character references are available.
8 Plaintiff has tried all his life to live a correct life and as a result has
9 built and enjoyed a good reputation, which the Defendants strived to
10 destroy. Exhibit 6 is one testimony to the success of his CD, "In
11 Friendship", by a very credible source.
12

13 DEFENDANTS & THE CLASSICAL GUITAR NEWSGROUP

14
15 10. The Defendants used the *rec.music.classical.guitar* Usenet newsgroup
16 (currently owned and operated by Google Incorporated) as a venue to commit
17 many of their violations. This is very likely the largest online classical
18 guitar discussion group and has readership and participation from hundreds
19 of guitar enthusiasts, world-wide. Several, if not all of the Defendants
20 have published messages on this forum.
21

22 11. Records posted on Usenet, as with much of the other contents of the
23 Internet, have a permanent nature since there archives of archives exist
24 online. Also, when people reply to messages and for example, quote a
25 fraudulent message, the fraudulent message getting falsely attributed to an
26 author gets copied and proliferates.
27
28

1 12. Plaintiff is not presently aware of the true names, identities, or
2 capacities of Defendants DOE 1 through DOE 10, nor of the address of the
3 non-DOE Defendants. The Defendants are known to the Plaintiff by their email
4 address, and the Internet Protocol ("IP") address assigned to each one by
5 his or her online service provider on the date and time at which each
6 infringing activity was observed.

7
8 13. At all relevant times, each of the Defendants may have been associated
9 with the remaining Defendants, thus acting in concert with or as agent, co-
10 conspirator, inspiration or motivator of each of the remaining Defendants
11 and was at all times herein mentioned, acting within the course, scope,
12 purpose, consent, knowledge, ratification and authorization of such agency,
13 association, cooperation and conspiracy.

14
15 14. By means of the Internet, the actions of Defendants, as described in
16 this complaint, occurred in California, in other States of the United
17 States, and in countries throughout the world.

18
19 15. The Plaintiff deleted some of the forged messages that had used his
20 email address but some of those may still exist on mirror sites that take
21 archive of archives. Also several messages are still online: messages that
22 the Plaintiff could not delete because the authors did not use his email
23 address but nonetheless forged his writing as replies to messages he did not
24 write which were presented as his writing. Plaintiff will also beg this
25 Honorable Court, following the filing of this complaint, to issue orders to
26 likes of Google Inc., to delete forged messages from the online archives.

1 16. This action seeks monetary and injunctive relief as to all causes of
2 action.

3
4 17. An extensive body of evidence which contains all the fraudulent
5 publications, forged website and so on, including the full headers, are
6 presented in Exhibit 5. In a separate motion the Plaintiff has begged this
7 Honorable court to allow Exhibit 5 to be filed under seal as it contains
8 highly offensive, easily misunderstood, and very dangerous content.

9
10 18. A couple of Defendants have confessed in writing to a couple of counts
11 out of the numerous counts of violations.

12
13 **INVESTIGATION & REPORTING TO LAW ENFORCEMENT AND ONLINE SERVICE**

14 **PROVIDERS**

15
16 19. Plaintiff has done extensive research and investigation and has
17 consulted with network specialists in examining the electronic footsteps and
18 traces left by the Defendants and has discovered some important facts which
19 are presented hereinafter. Sometimes more than one service provider was used
20 by the same Defendant.

21
22 20. The following online service providers and organizations used by the
23 Defendants were formally notified - through certified mail or other
24 verifiable means - of the alleged violations and the ongoing investigation,
25 and were requested to preserve the relevant records / traces pertaining to
26 the Defendants so that such records / traces are not inadvertently, or
27 procedurally, purged. To date, at least three of these organizations have
28 tracked and isolated the source of the actions and are awaiting order from

1 this Honorable court which will be requested by the Plaintiff following the
2 filing of this complaint.

- 3
- 4 a) RCN Corporation
- 5 b) Google Incorporated
- 6 c) Yahoo! Inc. / GeoCities
- 7 d) Giganeews Incorporated
- 8 e) Everyones Internet Incorporated
- 9 f) Homestead Technologies
- 10 g) Data Foundry Incorporated
- 11 h) Deloitte & Touche USA LLP
- 12 i) Time Warner Cable / Roadrunner
- 13 j) Nibble Information Systems / NNTPServer
- 14

15 21. The violations have been reported to the following agencies:

- 16 a) The Federal Bureau of Investigations (FBI reference: I05091018475587)
- 17 b) The Federal Trade Commission (FTC reference: 7052633)
- 18 c) Los Angeles Police Department
- 19 d) Legal Attaché : US Embassy, Bern, Switzerland
- 20

21
22 **FIRST CAUSE OF ACTION**

23
24 (Identity Theft and Assumption Deterrence Act of 1998

25 (18 U.S.C. § 1028 amended)

26
27 22. For the period 14 December 2004 to 13 September 2005, the DOE
28 Defendants attempted to assume, steal and misappropriate Plaintiff's

1 identity in the manner described presently through unauthorized use of
2 Plaintiff's name and email address and possibly a mock password all in
3 violation of the Identity Theft and Deterrence act, Title 18 U.S.C. § 1028.
4

5 23. During this period, Sixteen (16) messages were published on the
6 Internet by Defendants who used the Plaintiff's name, email address and
7 possibly a mock password to present themselves as the Plaintiff: ["Reza
8 Ganjavi (www.rezamusic.com)" <ganjavi@dtc.ch>]. These messages were not
9 written by the Plaintiff. Inarguably the combination of four identity
10 features, i.e., first name, last name, website URL, and email address very
11 uniquely and unambiguously identify the Plaintiff. Plaintiff has in the past
12 used the same set of attributes to publish material on the Internet. While
13 there are many persons named "Reza" in the world, to the best knowledge of
14 the Plaintiff there are no other "Reza Ganjavi"'s, and even if there were,
15 technically it is impossible to have another "Reza Ganjavi" with the email
16 address: "ganjavi@dtc.ch" and even more impossible to have anybody with any
17 name who can claim to be the "Reza" referred to by "www.rezamusic.com" as
18 the Plaintiff is the sole and legal owner of this website URL. Therefore,
19 using a combination of these identity features uniquely and unambiguously
20 identify the Plaintiff, and it is this exact combination which the
21 Defendants used to pose as the Plaintiff, and publish material with the
22 Plaintiff posed as the author. Furthermore, Defendants may have forged the
23 Plaintiff's password in order to post messages as the Plaintiff.
24

25 24. During this period there was no way to stop the recurrence of such
26 violations as the Usenet/Internet does not provide such technical facility.
27 Anybody can go online and post as anybody else. It is common sense that not
28 only such behavior is not civil, it is fraudulent. Within matter, the

1 Defendants intentionally and maliciously used the Plaintiff's identity,
2 without the Plaintiff's authorization, to post messages that the Plaintiff
3 had not written, unambiguously presenting the Plaintiff as the author. As
4 stated in Paragraph 4 above the Plaintiff asked the Defendants to stop their
5 violations many times to no avail.

6
7 25. The messages which were fraudulently posted with Plaintiff as the
8 author contained highly offensive material and violent content completely
9 contrary to the Plaintiff's beliefs and philosophy of life.

10
11 26. Most of the material posted with the Plaintiff fraudulently presented
12 as the author is too offensive to reproduce here in the body of this
13 complaint, however, some ingredients include the following which is merely a
14 small example of numerous counts of violations.

15
16 Time Warner Cable / Roadrunner

17
18 a) Using the Plaintiff's identity, threatened to kill a person with use
19 of extreme, graphic, physical violence.

20
21 b) Using the Plaintiff's identity, threatened and used obscene language
22 on the Defendants themselves - something the Plaintiff would never do.

23
24 c) Using the Plaintiff's identity, publicized false, negative, damaging
25 statements about the Plaintiff's products.

26
27 Giganews

1 d) Using the Plaintiff's identity, directed obscenity at the Plaintiff
2 himself and posted highly defamatory material about the Plaintiff.

3
4 e) Using the Plaintiff's identity, expressed sympathy for acts of
5 violence in a highly sensitive, charged, dangerous way, absolutely
6 contrary to the Plaintiff's beliefs. Plaintiff categorically condemns
7 acts of violence and terror and absolutely abhors all uncivil
8 activity.

9
10 f) Using the Plaintiff's identity, associated the Plaintiff with
11 extremist groups and ideologies; something which is absolutely,
12 utterly, false.

13
14 Teranews / NNTPServer

15
16 g) Using the Plaintiff's identity, directed many obscene remarks to the
17 Plaintiff and others

18
19 h) Using the Plaintiff's identity, directed racial slurs including
20 publicly publishing a message with the tile: "THIS IS WHY BLACK PEOPLE
21 ARE NIGGERS" (Exhibit 5) containing a link to a picture of a Black
22 person. This is absolutely and unquestionably against the Plaintiff's
23 belief. Plaintiff understands that "group libel" is not an actionable
24 offense, however, falsely attributing such insult to the Plaintiff as
25 the source is a violation of his rights. Plaintiff has utmost respect
26 and affection for the Black race especially, as he does for civil
27 fellow human beings of every race, ethnicity, country, gender, and
28 religion, and in addition Plaintiff has many Black friends and fans

1 and prospective customers who would be disgruntled if they stumble
2 upon such lies and insults written on behalf of the Plaintiff on the
3 Internet.

4
5 i) Using the Plaintiff's identity, made other remarks exhibiting racial
6 prejudice, for example, referring to the Plaintiff as a "sand Nigger"
7 who would do extreme graphic and obscene, filthy, lewd sexual acts.

8
9 j) Using the Plaintiff's identity, made vulgar sexual threats to others

10
11 k) Using the Plaintiff's identity, made vulgar sexual insults and
12 inappropriate and false remarks towards the Plaintiff

13
14 l) Using the Plaintiff's identity, made inappropriate sexual overtures to
15 others

16
17 m) Using the Plaintiff's identity, verbally attacked a civilized member
18 of the community

19
20 n) Using the Plaintiff's identity, falsely discarded and quashed what the
21 Plaintiff had actually written as not being his writing

22
23 o) Using the Plaintiff's identity, altered and posted Plaintiff's
24 copyrighted material without permission

25
26 27. The Plaintiff posted messages citing the fraudulent messages were not
27 his, but as demonstrated in Exhibit 5 the Defendants would sometimes turn
28 around, forge the Plaintiff's ID and post a message uniquely identifying the

1 Plaintiff as the author, quashing the corrective message the Plaintiff had
2 actually just posted, as not having been posted by him!

3
4 28. As a result of the foregoing, Plaintiff has suffered injuries to
5 himself, his profession, his reputation, his artistic career, his health,
6 and his relationships, in an amount to be determined at time of trial, but
7 within the jurisdictional limits of this Court. In the alternative,
8 Plaintiff prays for statutory damages for each fraudulent use of Plaintiff's
9 identity.

10
11 29. Plaintiff will suffer immediate and irreparable harm if this Court
12 does not order injunctive relief, in that his business, practice, and
13 artistic reputation will be taken from him.

14
15 30. Plaintiff has exhausted his administrative remedies.

16
17
18 **SECOND CAUSE OF ACTION**

19
20 (False Presentation in violation of the Anti-Cybersquatting Consumer
21 Protection Act, 15 U.S.C. § 1125)

22
23 31. Plaintiff incorporates by reference all allegations contained in any
24 preceding paragraph, as though fully set forth here.

25
26 32. Plaintiff herein refers to his "implicit" Trademark rights which arise
27 from use not from federal registration.

1 33. On or about August 5, 2005, and September 11 2005, it was brought to
2 the Plaintiff's attention that the Defendants had set up mock websites
3 strongly resembling the Plaintiff's registered websites in name, design, and
4 content.

5
6 34. One mock website hosted on Yahoo/Geocities (Exhibit 5) referred
7 explicitly and unambiguously to the Plaintiff in both text and photo,
8 endorsed products that the Plaintiff did not endorse, directed insults and
9 invectives at the Plaintiff and his products and services, putdown his
10 professional competence and offended the Plaintiff's potential customers.
11 This website was announced by a DOE Defendant who posed as "Official
12 Moderator <moderator@rmcg.com>" (Exhibit 5).

13
14 35. The site also directed sexual slurs towards the Plaintiff and his
15 business associates, implying that the Plaintiff was a homosexual, which he
16 is not. This last allegation is important because Plaintiff travels to Iran,
17 where his relatives still reside. In Iran, homosexuality is a crime and is
18 severely punishable, so posting this false allegation on the Internet is
19 especially dangerous for Plaintiff and harmful to him.

20
21 36. The aforementioned mock site was announced to the Plaintiff On
22 September 11 2005, from IP address [24.148.29.235] which indicates that the
23 Defendant maybe a customer of RCN. The Defendant wrote: "*You and I share
24 similar interests and even look alike. www.geocities.com/rezasworld*". On the
25 same day the site was also announced publicly (Exhibit 5). The site's visit-
26 counter indicated the site was visited by at least 99 visitors. From the
27 same email address, a day later, the Plaintiff got an email: "*Care to
28 negotiate a peace settlement?*" but this one was from the IP address

1 [167.219.0.140] which indicates that the Defendant maybe an employee of
2 Deloitte's (Exhibit 5). It is plausible that this DOE Defendant works for
3 Deloitte and uses RCN as home online service provider. Both Deloitte and RCN
4 have been notified about the violations. Plaintiff also noticed that his
5 online journal visit statistics show an obsessive number of visits from both
6 Deloitte (Exhibit 2) and RCN (Exhibit 3), as well as Time Warner Cable /
7 Roadrunner (Exhibit 4) - the same online providers and IP addresses from
8 which many violations discussed in this action occurred.

9
10 37. On August 4, 2005, another mock site (Exhibit 5) hosted on Homestead,
11 was publicly announced by Todd Tipton (Exhibit 5) using Time Warner Cable /
12 Roadrunner ISP. Todd Tipton's own website (www.toddtipton.com) is also
13 hosted on Homestead. The mock site maliciously impersonated the Plaintiff,
14 misrepresented the Plaintiff's beliefs, and insulted the Plaintiff, his
15 family and friends.

16
17 38. These False Presentations violated Section 43 of the Lanham Act, 15
18 U.S.C. § 1125, insofar as Plaintiff did not authorize, broker, sell, or
19 otherwise license the right to use his name, image, professional reputation,
20 to Defendants, or any of them. The Plaintiff requested the hosting companies
21 to pull down the mock websites. The sites were deleted after being online
22 for several days and attracting numerous visitors.

23
24 39. As a result of the foregoing, Plaintiff has suffered injuries to
25 himself, his profession, his reputation, his artistic career, his health,
26 and his relationships, in an amount to be determined at time of trial, but
27 within the jurisdictional limits of this Court. In the alternative,
28 Plaintiff prays for statutory damages for each violation of his trademark.

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40. Plaintiff will suffer immediate and irreparable harm if this Court does not order injunctive relief, in that his business, practice, and artistic reputation will be taken from him.

41. Plaintiff has exhausted his administrative remedies.

THIRD CAUSE OF ACTION

(Invasion of Privacy: False Light)

42. Plaintiff incorporates by reference all allegations contained in any preceding paragraph, as though fully set forth here.

43. This Cause of Action is similar to the First Cause of Action except that in this case the Defendants published material, highly offensive in nature, in the context of replies to quotations which were falsely attributed to the Plaintiff as the author.

Defendants using Time Warner Cable / Roadrunner

44. On 7 Jul 2005, Defendant Todd Tipton published a statement which the Plaintiff had not written as the Plaintiff's writing while uniquely identifying the Plaintiff as the author of the quoted text. The statement offended and insulted the group members (Exhibit 5). On 7 August 2005 Todd Tipton emailed the Plaintiff confessing to having setup the mock website hosted on Homestead as discussed in the Second Cause of Action hereinabove,

1 and to the 7 July 2005 statement he published which was falsely attributed
2 to the Plaintiff. He asked for forgiveness but since there are a number of
3 DOE's who have committed numerous, serious violations very similar to Todd
4 Tipton's, using the same ISP, and some from the same region as him, and they
5 are not yet identified, he was notified by the Plaintiff that the Plaintiff
6 can not take partial action and all Defendants need to be identified before
7 any resolution can be discussed. The Plaintiff had no reason to trust that
8 he would not repeat his actions without a formal restraining order or
9 agreement.

10
11 45. Using the screen name (John Ed Gore <gore0026@3dm.net>), a DOE
12 Defendant published appalling statements which the Plaintiff had not written
13 were published as his writings four times, uniquely identifying the
14 Plaintiff as the author of a quoted text.

15
16 46. Using the screen name (Rosa <rosa@rosarosarosa.soup>), appalling
17 statements which the Plaintiff had not written were published as his writing
18 six times, uniquely identifying the Plaintiff as the author of a quoted
19 text.

20
21 Defendant William David Jennings using DataFoundry / Email.com

22
23 47. William David Jennings has used multiple aliases to publish material
24 that have violated the Plaintiff's rights and placed the Plaintiff in False
25 Light. To get a glimpse for his character, here's a quote from a message he
26 posted on 26 October 2005 titled: "*Pinging the Cyber troll Administrator*":
27 "*I'm walking out the door headed for Mexico where I'll eat a dead kid*
28

1 *tonight*"! He further encourages villains known in the Newsgroup as "Cyber
2 Trolls" to act.

3
4 48. On several occasions 20 December 2004, the Defendant fraudulently
5 presented writings the Plaintiff had not written as those of having been
6 authored by the Plaintiff, explicitly and uniquely identifying the Plaintiff
7 by his first, last name, email address and website URL. Defendant also
8 negatively misrepresented sales on the Plaintiff's CD's.

9
10 49. On 28 December 2004, two times, the Defendant fraudulently presented
11 writings the Plaintiff had not written as those of having been authored by
12 the Plaintiff, explicitly and uniquely identifying the Plaintiff by his
13 first, last name, email address and website URL. Defendant also attacked
14 Plaintiff's CD, falsely relating Plaintiff to "*Pink Striped Pajamas Gang of*
15 *Abu Ghraib*", "*the gay scene in Tehran*", and in one of the messages, made
16 ethnic slurs, and lied about the functionality of certain links on the
17 Plaintiff's website that refer to the product reviews.

18
19 50. On 28 December 2004 and on 29 December 2004 the Defendant fraudulently
20 presented writings the Plaintiff had not written as those of having been
21 authored by the Plaintiff, explicitly and uniquely identifying the Plaintiff
22 by his first, last name, email address and website URL. Defendant also
23 heavily attacked Plaintiff's CD, resembling it to weapons of mass
24 destruction.

25
26 51. On 13 September 2005 the Defendant fraudulently presented writings the
27 Plaintiff had not written as those of having been authored by the Plaintiff,
28 explicitly and uniquely identifying the Plaintiff by his first, last name,

1 email address and website URL. The message fraudulently presented the
2 Plaintiff as having requested the Defendant to write a song for him and the
3 song lyrics included the hate lines: *"I'd sooner see your neatly smoked*
4 *carcass hanging on a meat hook in Hell."*

5
6 52. On 31 October Mr. Jennings wrote a review about the CD. While the
7 Plaintiff fully respects the freedom to hold opinions, Mr. Jennings' review
8 went far beyond expressing opinions. He lied and misrepresented the CD as
9 follows:

10 a) Lie 1: "I listened to Reza's CD one time. On the second repeat of
11 Spanish Romance I began to cringe ...after hear 6 (SIX) repeats of the
12 same song with different titles (which indicates a clear lack of
13 creative distinction) "Spanish Romance" (with flute and guitar) is
14 played yet again as "Sunset At The Alhambra"...

15 b) Fact is there is more difference between the variations than just the
16 title. The melodies of the lead instrument is different in every
17 single piece.

18 c) Lie 2: "Reza's CD's are not sold in stores and have almost no
19 distribution... occasionally sold in small Swiss music stores."

20 d) This is false as the Plaintiff's CD's (a) are sold in some stores and
21 do have distribution, both physical and digital; (b) in Switzerland,
22 the physical distribution includes large stores.

23
24 53. Two times on 7 July 2005, on 8 July 2005 and 31 October 2005, the
25 Defendant fraudulently presented writings the Plaintiff had not written as
26 those of having been authored by the Plaintiff, explicitly and uniquely
27 identifying the Plaintiff by his first, last name, email address and website
28 URL. These messages self-attack the Plaintiff's products, person,

1 personality, education, skills, and etcetera. The messages are linked to the
2 Defendant as he has consistently identified himself as the owner of
3 "seadrifter@email.com" and often signs emails from this and
4 "journey@texas.net" as "Che' de Guy".

5
6 Defendant Douglas Carlson using Hotmail, Everyone's Internet (EVI), etc.

7
8 54. Defendant Douglas Carlson, using "hogrider7@hotmail.com" has
9 repeatedly bashed the Plaintiff's CD's which the Plaintiff has no problem
10 with until the line is crossed into violating his rights. There is evidence
11 that he has collaborated with some of the above named Defendants on
12 occasion. He has repeatedly accused the Plaintiff of being homosexual, and
13 also of having engaged in crude sexual acts, all of which are untrue.

14
15 55. The Defendant made one such remark in a message he posted on 14
16 December 2004 (#232976). On 4 August 2005 (#263108) he published a message
17 that the Plaintiff has no testicles.

18
19 56. On 27 December 2004 (#234260) the Defendant associated the Plaintiff
20 with terrorism (which is absolutely and utterly false) and suggested that he
21 should be reported to the FBI. His reasoning for this was that the Plaintiff
22 was born in Iran!

23
24 57. On 13 September 2005 the Defendant assaults Plaintiff's professional
25 qualification as a guitarist. (#256125).

26
27 58. On 21 December 2005 (#233782) Defendant falsely accused the Plaintiff
28 of being a racist and of other lies, which are absolutely false. He also

1 asserted that the Plaintiff has no other place for promotion other than the
2 newsgroup which is absolutely false and he well knows it but lied about it
3 to be malicious.

4
5 59. On 1 November 2005 (#259225) Defendant wrote about the Plaintiff's CD,
6 "In Friendship" published more false statements about the Plaintiff's
7 education and sexual orientation, and accused the Plaintiff of having a
8 Sexually Transmitted Disease (absolutely false). He continued: '*Pepe of the*
9 *Gay Mexico City Quartet said, "Reza spent a night playing with us, I only*
10 *wish he would have brought his guitar with him", Jose also of the Gay Mexico*
11 *City Quartet added, "its not my fault he got the STD, he's the one who*
12 *wanted it bareback.'*

13
14 60. Defendant finishes the messages by fraudulently presenting a quote
15 that the Plaintiff never wrote as having been authored by the Plaintiff in
16 which the Plaintiff talks about lack of customer satisfaction in his product
17 (statistically false).

18
19 61. Note: Everyone's Internet has at times used PacWest and
20 Adbasesystems.com to lease lines or buy ports for dialup.

21
22 62. As a result of the foregoing, Plaintiff has suffered injuries to
23 himself, his profession, his reputation, his artistic career, his health,
24 and his relationships, in an amount to be determined at time of trial, but
25 within the jurisdictional limits of this Court.

1 63. Plaintiff will suffer immediate and irreparable harm if this Court
2 does not order injunctive relief, in that his business, practice, and
3 artistic reputation will be taken from him.

4
5 64. Plaintiff has exhausted his administrative remedies.

6
7
8 **FOURTH CAUSE OF ACTION**

9
10 (Defamation Per Se, Libel & Slander)

11
12 65. Plaintiff incorporates by reference all allegations contained in any
13 preceding paragraph, as though fully set forth here.

14
15 66. Plaintiff claims that the Defendants' actions have caused Plaintiff's
16 reputation to seriously suffer.

17
18 67. Said libel and slander as described in preceding paragraphs was
19 certainly written, possibly also spoken, and certainly placed on the
20 Internet.

21
22 68. Said allegations were untrue, and were conveyed to third parties.

23
24 69. Said allegations, were defamatory per se and also caused third parties
25 to hate, dislike and avoid Plaintiff. The statements:

26 a) were defamatory, and false to the Plaintiff's discredit

27 b) were understood as being of and concerning the Plaintiff

28 c) were understood as tending to harm the reputation of Plaintiff

- 1 d) exposed the Plaintiff to hatred, ridicule, contempt, obloquy
2 e) lowered him in the esteem of his fellows and caused him to be shunned
3 f) injured him in respect to his business and calling
4 g) imputed to him general disqualifications in those respects which his
5 occupation peculiarly requires, e.g., ability to perform music
6 h) created a great deal of mental anguish
7 i) exposed the Plaintiff to grave danger, specially in international
8 travel
9 j) were made with actual malice.

10
11 70. As a result of the foregoing, Plaintiff has suffered injuries to
12 himself, his profession, his reputation, his artistic career, his health,
13 and his relationships, in an amount to be determined at time of trial, but
14 within the jurisdictional limits of this Court.

15
16 71. Plaintiff will suffer immediate and irreparable harm if this Court
17 does not order injunctive relief, in that his business, practice, and
18 artistic reputation will be taken from him.

19
20 72. Plaintiff has exhausted his administrative remedies.

21
22
23 **FIFTH CAUSE OF ACTION**

24
25 (Defamation, Libel & Slander)

26
27 73. Plaintiff incorporates by reference all allegations contained in any
28 preceding paragraph, as though fully set forth here.

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74. Plaintiff claims that the Defendants' actions have caused Plaintiff's reputation to seriously suffer.

75. Said libel and slander as described in preceding paragraphs was certainly written, possibly also spoken, and certainly placed on the Internet.

76. Said allegations were untrue, and were conveyed to third parties.

77. Said allegations, were defamatory and also caused third parties to hate, dislike and avoid Plaintiff. The statements:

- k) were defamatory, and false to the Plaintiff's discredit
- l) were understood as being of and concerning the Plaintiff
- m) were understood as tending to harm the reputation of Plaintiff
- n) exposed the Plaintiff to hatred, ridicule, contempt, obloquy
- o) lowered him in the esteem of his fellows and caused him to be shunned
- p) injured him in respect to his business and calling
- q) imputed to him general disqualifications in those respects which his occupation peculiarly requires, e.g., ability to perform music
- r) created a great deal of mental anguish
- s) exposed the Plaintiff to grave danger, specially in international travel
- t) were made with actual malice.

78. In one particular instance not described in preceding paragraphs, Defendants attacked Plaintiff's product on Amazon in an orchestrated fashion leaving highly defamatory and false reviews far exceeding the limits of

1 their First Amendment rights. They also directed profanity at anyone on the
2 group who did not cooperate with them in attacking the Plaintiff.

3
4 79. As a result of the foregoing, Plaintiff has suffered injuries to
5 himself, his profession, his reputation, his artistic career, his health,
6 and his relationships, in an amount to be determined at time of trial, but
7 within the jurisdictional limits of this Court.

8
9 80. Plaintiff will suffer immediate and irreparable harm if this Court
10 does not order injunctive relief, in that his business, practice, and
11 artistic reputation will be taken from him.

12
13 81. Plaintiff has exhausted his administrative remedies.

14
15
16 **SIXTH CAUSE OF ACTION**

17 (Invasion of Privacy: Appropriation of Name or Likeness)

18
19 82. Plaintiff incorporates by reference all allegations contained in any
20 preceding paragraph, as though fully set forth here.

21
22 83. As demonstrated in the preceding paragraphs the Defendants have at
23 times explicitly appropriated to their own use the name or likeness of the
24 Plaintiff without the Plaintiff's authorization.

25
26 84. As a result of the foregoing, Plaintiff has suffered injuries to
27 himself, his profession, his reputation, his artistic career, his health,
28

1 and his relationships, in an amount to be determined at time of trial, but
2 within the jurisdictional limits of this Court.

3
4 85. Plaintiff will suffer immediate and irreparable harm if this Court
5 does not order injunctive relief, in that his business, practice, and
6 artistic reputation will be taken from him.

7 Plaintiff has exhausted his administrative remedies.
8

9
10 **SEVENTH CAUSE OF ACTION**

11
12 (Negligent and Intentional Infliction of Emotional Distress)

13
14 86. Plaintiff incorporates by reference all allegations contained in any
15 preceding paragraph, as though fully set forth here.

16
17 87. As demonstrated in the preceding paragraphs the Defendants have
18 demonstrated outrageous conduct with intention of causing or reckless
19 disregard of the probability of causing emotional distress. Such conduct has
20 caused the Plaintiff's extreme suffering and severe emotional distress
21 including highly unpleasant mental reactions such as nightmares, fright,
22 nervousness, grief, anxiety, worry, mortification, shock, humiliation and
23 indignity, as well as physical pain and injury.

24
25 88. In addition to the actions described in the preceding paragraphs, one
26 Doe Defendant with the same IP addresses (Deloitte/RCN) of one who has
27 committed other violations stalked the Plaintiff with numerous crank emails
28 posing as a potential customer and ultimately accusing the Plaintiff of

1 having criminal intension (Exhibit 5). Twelve emails from: "Billy Zantzinger
2 <modelthry@yahoo.com>" IP address: [167.219.0.147] (Deloitte) sought to
3 engage Plaintiff in conversation and subsequently accused Plaintiff of
4 cheating him for not sending him a CD for the money he said he paid which he
5 never paid and was never able to provide proof that he had paid.

6
7 89. As a result of the foregoing, Plaintiff has suffered injuries to
8 himself, his profession, his reputation, his artistic career, his health,
9 and his relationships, in an amount to be determined at time of trial, but
10 within the jurisdictional limits of this Court.

11
12 90. Plaintiff will suffer immediate and irreparable harm if this Court
13 does not order injunctive relief, in that his business, practice, and
14 artistic reputation will be taken from him.

15
16 91. Plaintiff has exhausted his administrative remedies.

17
18
19 **EIGHTH CAUSE OF ACTION**

20
21 (Intentional Interference with Prospective Economic Advantage)

22
23 92. Plaintiff incorporates by reference all allegations contained in any
24 preceding paragraph, as though fully set forth here.

25
26 93. Plaintiff believes that some of the Defendants are classical
27 guitarists who engage in similar business as the Plaintiff (e.g.
28 performance) and that there is a prospective economic relationship as a

1 result. The Defendants intentionally committed the aforementioned violations
2 with awareness of that relationship in order to disrupt Plaintiff's business
3 activity, and managed to do so.

4
5 94. As a result of the foregoing, Plaintiff has suffered injuries to his
6 profession in an amount to be determined at time of trial, but within the
7 jurisdictional limits of this Court.

8
9 95. Plaintiff will suffer immediate and irreparable harm if this Court
10 does not order injunctive relief, in that his business, practice, and
11 artistic reputation will be taken from him.

12
13 96. Plaintiff has exhausted his administrative remedies.

14
15
16 **NINTH CAUSE OF ACTION**

17
18 (Unfair Competition)

19
20 97. Plaintiff incorporates by reference all allegations contained in any
21 preceding paragraph, as though fully set forth here.

22
23 98. Plaintiff believes some of the Defendants are classical guitarists who
24 engage in similar business as the Plaintiff (e.g. performance) and as such
25 the aforementioned violations were partly committed with the motive to hurt
26 the Plaintiff's business unfairly.

1 99. As a result of the foregoing, Plaintiff has suffered injuries to his
2 profession, in an amount to be determined at time of trial, but within the
3 jurisdictional limits of this Court.

4
5 100. Plaintiff will suffer immediate and irreparable harm if this Court
6 does not order injunctive relief, in that his business, practice, and
7 artistic reputation will be taken from him.

8
9 101. Plaintiff has exhausted his administrative remedies.

10
11
12 **TENTH CAUSE OF ACTION**

13
14 (Infringement of Copyright Protection Act, 17 U.S.C. § 501)

15
16 102. Plaintiff incorporates by reference all allegations contained in any
17 preceding paragraph, as though fully set forth here.

18
19 103. Plaintiff is the owner of certain registered copyrights, in connection
20 with his CDs entitled "In Friendship", "Dancing Hands", and design and
21 contents of websites entitled "rezamusic.com", "rezaworld.com", and
22 "angeloangelo.com".

23
24 104. On or about 5 August 2005, and 11 September 2005, Defendants attempted
25 to assume, steal and misappropriate Plaintiff's intellectual property in the
26 manner described hereinabove under the Second Cause of Action, all in
27 violation of the Copyright Act, Title 18 U.S.C. § 501.

1 105. On 25 November 2005 Defendant Douglas Carlson violated the Plaintiff's
2 copyright five times by publishing on the Internet a private message from
3 the Plaintiff asking him to remove the problematic posts. The message had an
4 explicit copyright statement. The Defendant defended his action upon
5 questioning from a fellow group member (and Professor) by responding: *'...what
6 kind of crap is it when he says "this email message is the property of the
7 author " etc. Once I received it it was mine to do with as I pleased.'*
8 totally disregarding the intellectual property law which was clearly
9 reiterated to him.

10
11 106. On 13 September 2005, a DOE Defendant illegally assuming the identity
12 of the Plaintiff as described under First Cause of Action, sub-section "o",
13 altered and posted Plaintiff's copyrighted material without permission
14 (Exhibit 5)

15
16 107. As a result of the foregoing, Plaintiff has suffered injuries to
17 himself, his profession, his reputation, his artistic career, his health,
18 and his relationships, in an amount to be determined at time of trial, but
19 within the jurisdictional limits of this Court. In the alternative,
20 Plaintiff prays for statutory damages for each violation of his copyrights.

21
22 108. Plaintiff will suffer immediate and irreparable harm if this Court
23 does not order injunctive relief, in that his business, practice, and
24 artistic reputation will be taken from him.

25
26 109. Plaintiff has exhausted his administrative remedies.

ELEVENTH CAUSE OF ACTION

(Transportation of Obscene Matters 18 U.S.C. § 1462)

110. Plaintiff incorporates by reference all allegations contained in any preceding paragraph, as though fully set forth here.

111. The content of several instances of written communication posted on the nationally, cross-state, and globally accessible Usenet system, was highly obscene, lewd, lascivious, and filthy. These communications were directed towards the Plaintiff, or directed at others while the Defendant posed as the Plaintiff uniquely identifying himself as the Plaintiff. Exhibit 5 contains several instances of such communication which incidentally, is also available to minors, and there have been cases of minors who have read, posted, and communicated on the Usenet group in question.

112. As a result of the foregoing, Plaintiff has suffered injuries to himself, his profession, his reputation, his artistic career, his health, and his relationships, in an amount to be determined at time of trial, but within the jurisdictional limits of this Court. In the alternative, Plaintiff prays for statutory damages for the transmission of the extremely obscene material over the Internet across the United States and globally.

113. Plaintiff will suffer immediate and irreparable harm if this Court does not order injunctive relief, in that his business, practice, and artistic reputation will be taken from him.

1 114. Plaintiff has exhausted his administrative remedies.

2
3
4 **PRAYER FOR RELIEF**

5
6 WHEREFORE, Plaintiff prays judgment against Defendants as follows:

- 7
8 1. An award of actual damages fully compensating Plaintiff for all
9 injuries he has suffered as a direct and proximate result of
10 Defendants' deprivation of Plaintiff's liberty and rights, without due
11 process of law;
- 12 2. Punitive and exemplary damages;
- 13 3. Reasonable attorney fees according to proof, pursuant to statute;
- 14 4. Immediate issuance of a temporary restraining order, followed by a
15 preliminary injunction, and ultimately by a permanent injunction
16 preventing Defendants and their respective agents, employees and
17 representatives from using Plaintiff's name on the Internet;
- 18 5. Plaintiff's cost of suit herein incurred; and
- 19 6. Such other and further relief as the court may deem just and proper.

20
21 DATED: December 8, 2005 RESPECTFULLY SUBMITTED

22
23 BY: _____

24 REZA GANJAVI

25 Plaintiff in Pro Se

26
27
28 **DEMAND FOR JURY TRIAL**

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Plaintiff demands a jury trial on all issues.

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EXHIBIT 1 - MUSIC COMPACT DISKS

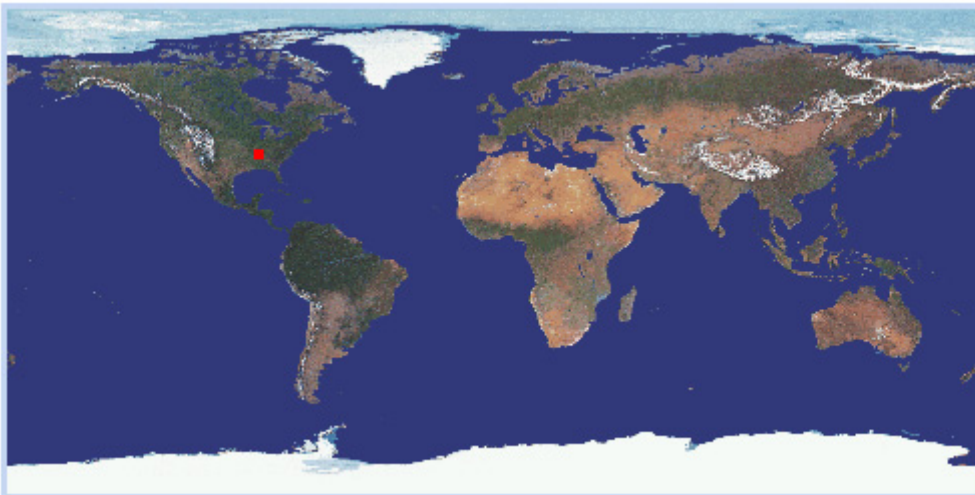
Non-Paper Physical Exhibit (external) : Plaintiff's CD's "In
Friendship" & "Dancing Hands".

EXHIBIT 2 - DELOITTE VISITS

Site visit statistics for Plaintiff's "web log" www.rezaworld.com, shedding light on the obsessive nature of the Defendants. These visits originated from the same online service providers, and in many cases, from the same exact IP addresses, as those of the Defendants who committed many of the aforementioned violations.

A Deloitte Network Security Team Leader informed the Plaintiff that the Hermitage, Tennessee data center, from which the visits and aforementioned violations originate, is merely a hub which services Deloitte's different geographical locations within the United States.

DELOITTE - 146



VISITOR ANALYSIS	
Referring Link	http://www.rezaworld.com/
Host Name	usdtc7.deloitte.com
IP Address	167.219.0.146
Country	United States
Region	Tennessee
City	Hermitage
ISP	Deloitte & Touche
Returning Visits	2
Visit Length	Visit spread over more than one day
VISITOR SYSTEM SPECS	
Browser	MSIE 6.0
Operating System	Windows XP
Resolution	1024x768
Javascript	Enabled

Date	Time	WebPage
25th July 2005	17:52:42	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
25th July 2005	17:54:45	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com

Navigation Path

Date	Time	WebPage
1st August 2005	22:41:35	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
2nd August 2005	00:23:09	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
2nd August 2005	23:52:19	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
4th August 2005	16:14:08	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
4th August 2005	17:31:17	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
4th August 2005	18:29:25	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
4th August 2005	20:20:43	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
4th August 2005	21:26:31	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
4th August 2005	22:52:25	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
5th August 2005	17:44:59	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
5th August 2005	18:24:35	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
5th August 2005	21:46:42	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
5th August 2005	23:52:00	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
5th August 2005	23:54:12	home.datacomm.ch/rezamusik/angeloangelo/index.html home.datacomm.ch/rezamusik/index.html
6th August 2005	20:03:24	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
		home.datacomm.ch/rezamusik/rezaworld/

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			www.rezaworld.com/
6th August 2005	20:04:59		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
6th August 2005	20:05:03		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
6th August 2005	22:16:02		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
6th August 2005	22:20:13		home.datacomm.ch/rezamusik/rezaworld/#_Toc111110790 www.rezaworld.com/
6th August 2005	23:35:18		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
7th August 2005	01:17:21		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
7th August 2005	22:18:27		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
8th August 2005	02:29:09		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
8th August 2005	16:35:51		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
10th August 2005	18:01:57		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
10th August 2005	20:11:24		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
10th August 2005	20:34:48		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
10th August 2005	22:19:19		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
10th August 2005	22:47:38		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
10th August 2005	23:20:24		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
11th August 2005	00:29:47		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
11th August 2005	01:00:17		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
11th August 2005	15:56:44		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
11th August 2005	17:26:29		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
11th August 2005	19:09:25		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
11th August 2005	19:46:35		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
11th August 2005	21:48:59		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
11th August 2005	23:22:31		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
12th August 2005	00:42:42		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
12th August 2005	01:45:29		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
12th August 2005	02:09:13		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
12th August 2005	16:58:09		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
12th August 2005	17:40:41		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
12th August 2005	17:40:47		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
12th August 2005	18:09:00		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
12th August 2005	18:09:04		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
12th August 2005	18:39:43		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
12th August 2005	18:39:48		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
12th August 2005	18:45:59		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
12th August 2005	19:26:53		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
12th August 2005	20:11:52		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
12th August 2005	21:00:42		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
12th August 2005	21:54:23		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
15th August 2005	17:02:00		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
15th August 2005	17:02:14		home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com

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15th August 2005	18:55:47	www.rezaworld.com home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
15th August 2005	18:56:27	home.datacomm.ch/rezamusik/angeloangelo/index.html home.datacomm.ch/rezamusik/
15th August 2005	18:57:07	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
15th August 2005	19:17:23	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
15th August 2005	19:29:57	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
15th August 2005	20:05:30	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
15th August 2005	20:19:52	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
15th August 2005	20:25:10	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
15th August 2005	20:39:43	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
15th August 2005	21:07:53	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
15th August 2005	21:51:41	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
15th August 2005	22:16:13	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
15th August 2005	22:44:06	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
15th August 2005	23:02:35	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
15th August 2005	23:03:07	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
15th August 2005	23:03:12	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
15th August 2005	23:19:04	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
16th August 2005	00:03:15	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
16th August 2005	00:20:34	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
16th August 2005	16:04:03	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
16th August 2005	17:20:32	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
16th August 2005	18:25:03	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
16th August 2005	18:58:43	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
16th August 2005	19:38:20	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
16th August 2005	20:59:48	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
16th August 2005	21:00:10	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
16th August 2005	21:34:53	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
16th August 2005	21:53:50	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
16th August 2005	22:39:41	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
16th August 2005	23:09:26	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
16th August 2005	23:41:27	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
17th August 2005	16:23:51	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
17th August 2005	16:23:56	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
17th August 2005	16:24:17	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
17th August 2005	16:24:20	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
17th August 2005	16:24:23	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
17th August 2005	16:46:50	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
17th August 2005	16:47:01	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
17th August 2005	17:10:38	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
17th August 2005	18:27:06	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
17th August 2005	19:11:06	home.datacomm.ch/rezamusik/rezaworld/

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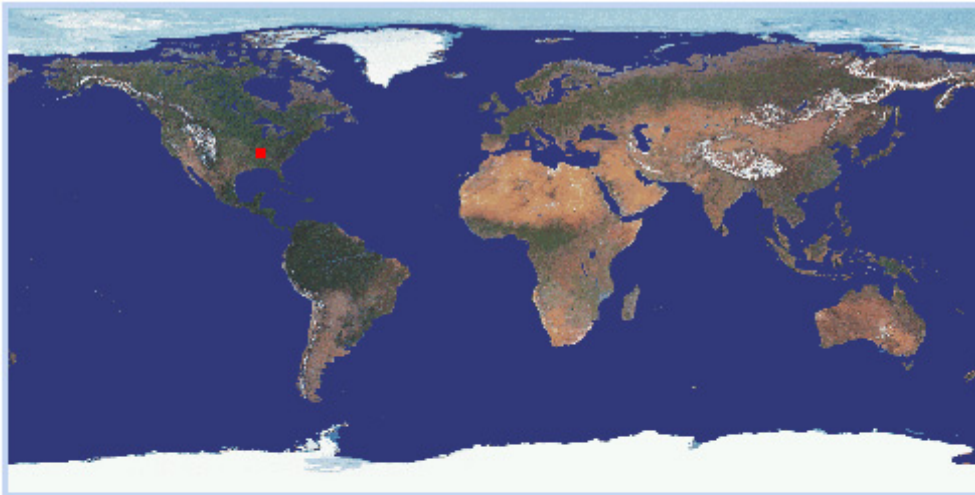
			No referring link
17th August 2005	19:37:12	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com	
17th August 2005	20:18:24	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com	
17th August 2005	20:18:29	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com	
17th August 2005	20:36:25	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com	
17th August 2005	21:20:46	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com	
17th August 2005	23:03:43	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com	
18th August 2005	16:22:13	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com	
18th August 2005	16:23:33	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/	
18th August 2005	17:25:04	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com	
18th August 2005	17:25:10	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com	
18th August 2005	21:13:37	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com	
18th August 2005	21:14:07	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/	
18th August 2005	21:52:27	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com	
18th August 2005	23:13:16	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com	
19th August 2005	16:09:26	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com	
19th August 2005	18:57:43	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com	
19th August 2005	18:58:30	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/	
19th August 2005	21:39:47	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com	
22nd August 2005	18:29:15	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com	
22nd August 2005	20:57:15	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com	
23rd August 2005	16:15:05	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/	
23rd August 2005	16:16:30	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/	
23rd August 2005	17:57:09	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/	
23rd August 2005	22:18:25	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com	
23rd August 2005	22:19:01	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/	
24th August 2005	00:20:15	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com	
24th August 2005	16:19:34	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com	
24th August 2005	22:18:48	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com	
24th August 2005	22:33:27	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com	
25th August 2005	00:18:34	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com	
25th August 2005	16:25:47	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/	
26th August 2005	00:03:16	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/	
26th August 2005	17:13:18	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com	
26th August 2005	17:13:23	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com	
26th August 2005	23:17:14	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/	
27th August 2005	21:02:03	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com	
28th August 2005	19:06:40	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/	
29th August 2005	20:34:15	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com	
1st September 2005	22:32:50	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/	
8th September 2005	19:44:23	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/	

1	9th September 2005	16:32:20	www.rezaworld.com home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
2	9th September 2005	20:51:49	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
3	9th September 2005	21:01:11	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
4	10th September 2005	00:11:04	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
5	10th September 2005	00:22:19	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
6	11th September 2005	19:43:11	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
7	12th September 2005	16:32:37	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
8	12th September 2005	16:44:24	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
9	12th September 2005	17:18:55	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
10	12th September 2005	17:51:44	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
11	12th September 2005	18:07:09	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
12	12th September 2005	18:45:36	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
13	12th September 2005	20:20:56	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
14	12th September 2005	21:02:14	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
15	12th September 2005	21:40:42	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
16	12th September 2005	22:23:47	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
17	12th September 2005	22:55:32	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
18	12th September 2005	23:32:07	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
19	13th September 2005	00:20:15	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
20	13th September 2005	00:20:46	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
21	13th September 2005	00:23:32	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
22	13th September 2005	00:38:24	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
23	13th September 2005	18:20:01	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
24	13th September 2005	20:07:49	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
25	13th September 2005	20:24:11	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
26	13th September 2005	21:41:38	home.datacomm.ch/rezamusik/rezaworld/ No referring link
27	13th September 2005	23:23:43	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
28	14th September 2005	16:14:16	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
	14th September 2005	18:57:18	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
	14th September 2005	22:08:56	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
	14th September 2005	23:34:34	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
	20th September 2005	16:00:17	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
	23rd September 2005	21:56:35	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
	3rd October 2005	23:01:30	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
	5th October 2005	00:11:23	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
	5th October 2005	00:14:42	home.datacomm.ch/rezamusik/rezaworld/ No referring link
	5th October 2005	21:51:55	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
	5th October 2005	21:52:00	home.datacomm.ch/rezamusik/rezaworld/index.html#forqery home.datacomm.ch/rezamusik/rezaworld/
	5th October 2005	23:10:19	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
	5th October 2005	23:11:14	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
	7th October 2005	22:36:41	home.datacomm.ch/rezamusik/rezaworld/

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			www.rezaworld.com/
12th October 2005	17:54:40	home.datacomm.ch/rezamusik/rezaworld/	www.rezaworld.com/
12th October 2005	18:06:36	home.datacomm.ch/rezamusik/rezaworld/	www.rezaworld.com/
12th October 2005	18:08:35	home.datacomm.ch/rezamusik/rezaworld/	www.rezaworld.com/
12th October 2005	23:04:30	home.datacomm.ch/rezamusik/rezaworld/	www.rezaworld.com
18th October 2005	20:02:00	home.datacomm.ch/rezamusik/rezaworld/	www.rezaworld.com/
18th October 2005	20:02:10	home.datacomm.ch/rezamusik/rezaworld/	www.rezaworld.com/
18th October 2005	22:37:54	home.datacomm.ch/rezamusik/rezaworld/	www.rezaworld.com/
25th October 2005	17:11:41	home.datacomm.ch/rezamusik/rezaworld/	www.rezaworld.com
25th October 2005	21:43:48	home.datacomm.ch/rezamusik/rezaworld/	rezaworld.com/
26th October 2005	00:36:46	home.datacomm.ch/rezamusik/rezaworld/	www.rezaworld.com
26th October 2005	21:29:05	home.datacomm.ch/rezamusik/rezaworld/	www.rezaworld.com
26th October 2005	22:46:59	home.datacomm.ch/rezamusik/rezaworld/	www.rezaworld.com
26th October 2005	23:48:29	home.datacomm.ch/rezamusik/rezaworld/	www.rezaworld.com/
27th October 2005	16:59:32	home.datacomm.ch/rezamusik/rezaworld/	www.rezaworld.com
27th October 2005	23:11:10	home.datacomm.ch/rezamusik/rezaworld/	www.rezaworld.com
27th October 2005	23:17:27	home.datacomm.ch/rezamusik/rezaworld/	www.rezaworld.com
28th October 2005	21:38:54	home.datacomm.ch/rezamusik/angeloangelo/	www.angeloangelo.com/
31st October 2005	20:09:22	home.datacomm.ch/rezamusik/rezaworld/	www.rezaworld.com
31st October 2005	20:09:29	home.datacomm.ch/rezamusik/rezaworld/	www.rezaworld.com
31st October 2005	20:13:14	home.datacomm.ch/rezamusik/rezaworld/	www.rezaworld.com/
31st October 2005	20:13:55	home.datacomm.ch/rezamusik/rezaworld/	www.rezaworld.com/
31st October 2005	20:49:10	home.datacomm.ch/rezamusik/rezaworld/	www.rezaworld.com/
31st October 2005	22:50:33	home.datacomm.ch/rezamusik/rezaworld/	www.rezaworld.com/
31st October 2005	23:34:49	home.datacomm.ch/rezamusik/rezaworld/	www.rezaworld.com/
1st November 2005	16:23:46	home.datacomm.ch/rezamusik/rezaworld/	www.rezaworld.com
1st November 2005	16:23:50	home.datacomm.ch/rezamusik/rezaworld/	www.rezaworld.com
1st November 2005	16:45:51	home.datacomm.ch/rezamusik/rezaworld/	www.rezaworld.com
2nd November 2005	22:07:09	home.datacomm.ch/rezamusik/rezaworld/	www.rezaworld.com
3rd November 2005	00:32:39	home.datacomm.ch/rezamusik/rezaworld/	www.rezaworld.com/
8th November 2005	22:38:17	No referring link	
9th November 2005	21:15:17	home.datacomm.ch/rezamusik/rezaworld/	www.rezaworld.com
10th November 2005	00:27:32	home.datacomm.ch/rezamusik/rezaworld/	www.rezaworld.com

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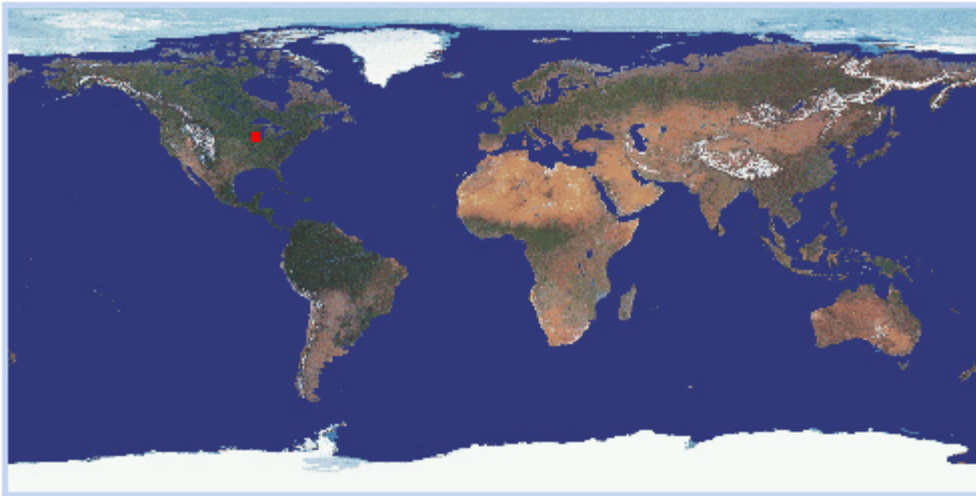
VISITOR ANALYSIS	
Referring Link	No referring link
Host Name	usdtc8.deloitte.com
IP Address	167.219.0.147
Country	United States
Region	Tennessee
City	Hermitage
ISP	Deloitte & Touche
Returning Visits	0
Visit Length	Visit spread over more than one day
VISITOR SYSTEM SPECS	
Browser	MSIE 6.0
Operating System	Windows XP
Resolution	Unknown
Javascript	Disabled

Navigation Path

Date	Time	WebPage
14th November 2005	18:30:21	No referring link
14th November 2005	18:30:28	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
14th November 2005	19:00:16	No referring link
14th November 2005	19:02:04	No referring link
14th November 2005	19:02:29	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
17th November 2005	18:54:38	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
18th November 2005	23:01:22	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
21st November 2005	23:39:56	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
22nd November 2005	21:25:15	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
28th November 2005	19:53:40	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
28th November 2005	22:35:26	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
29th November 2005	17:27:13	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
29th November 2005	19:12:50	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
29th November 2005	21:51:19	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
30th November 2005	16:24:52	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
		home.datacomm.ch/rezamusik/rezaworld/
		www.rezaworld.com
30th November 2005	16:25:44	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
30th November 2005	16:25:46	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
30th November 2005	16:33:42	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
30th November 2005	16:41:15	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
30th November 2005	17:33:48	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
30th November 2005	18:35:17	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
30th November 2005	22:08:00	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
30th November 2005	22:48:55	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
1st December 2005	01:36:11	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
1st December 2005	16:39:44	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
1st December 2005	19:25:59	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
1st December 2005	22:31:01	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
2nd December 2005	21:07:34	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
5th December 2005	19:55:05	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
5th December 2005	23:28:50	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
6th December 2005	19:43:30	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
7th December 2005	00:08:59	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
7th December 2005	00:15:53	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com

EXHIBIT 3 - RCN VISITS

Site visit statistics for Plaintiff's "web log" www.rezaworld.com, shedding light on the obsessive nature of the Defendants. These visits originated from the same online service providers, and in many cases, from the same exact IP addresses, as those of the Defendants who committed many of the aforementioned violations.



VISITOR ANALYSIS

Referring Link	http://www.rezaworld.com/
Host Name	24-148-29-235.mart-bsr1.chi-mart.il.cable.rcn.com
IP Address	24.148.29.235
Country	United States
Region	Illinois
City	Chicago
ISP	Rcn Corporation
Returning Visits	6
Visit Length	Visit spread over more than one day

VISITOR SYSTEM SPECS

Browser	Mozilla 5.0
Operating System	Linux
Resolution	1024x768
Javascript	Enabled

Navigation Path

Date	Time	WebPage
29th July 2005	02:50:20	home.datacomm.ch/rezamusica/rezaworld/www.rezaworld.com/
29th July 2005	15:15:30	home.datacomm.ch/rezamusica/rezaworld/www.rezaworld.com/
29th July 2005	22:12:32	home.datacomm.ch/rezamusica/rezaworld/www.rezaworld.com/
30th July 2005	04:00:01	home.datacomm.ch/rezamusica/rezaworld/www.rezaworld.com/
30th July 2005	13:15:48	home.datacomm.ch/rezamusica/rezaworld/www.rezaworld.com/
30th July 2005	20:53:59	home.datacomm.ch/rezamusica/rezaworld/www.rezaworld.com/
31st July 2005	01:18:00	home.datacomm.ch/rezamusica/rezaworld/www.rezaworld.com/
31st July 2005	01:22:45	home.datacomm.ch/rezamusica/rezaworld/www.rezaworld.com/
31st July 2005	04:42:22	home.datacomm.ch/rezamusica/rezaworld/www.rezaworld.com/
31st July 2005	13:03:01	home.datacomm.ch/rezamusica/rezaworld/www.rezaworld.com/
31st July 2005	15:34:32	home.datacomm.ch/rezamusica/rezaworld/www.rezaworld.com/
31st July 2005	17:01:57	home.datacomm.ch/rezamusica/rezaworld/www.rezaworld.com/
31st July 2005	18:45:19	home.datacomm.ch/rezamusica/rezaworld/www.rezaworld.com/
31st July 2005	20:39:23	home.datacomm.ch/rezamusica/rezaworld/www.rezaworld.com/
1st August 2005	11:25:58	home.datacomm.ch/rezamusica/rezaworld/www.rezaworld.com/

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1st August 2005	13:25:42	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
2nd August 2005	12:33:00	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
3rd August 2005	13:55:44	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
4th August 2005	03:38:59	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
5th August 2005	00:18:33	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
5th August 2005	01:50:19	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
5th August 2005	02:23:01	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
5th August 2005	03:03:40	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
5th August 2005	04:11:57	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
5th August 2005	13:52:56	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
6th August 2005	10:43:59	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
7th August 2005	18:13:53	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
9th August 2005	02:11:17	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
9th August 2005	07:03:21	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
9th August 2005	13:25:13	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
9th August 2005	13:25:18	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
10th August 2005	19:02:00	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
10th August 2005	19:31:51	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
11th August 2005	01:54:37	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
11th August 2005	02:47:42	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
11th August 2005	13:13:41	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
11th August 2005	13:45:53	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
11th August 2005	15:12:15	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
12th August 2005	03:22:18	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
12th August 2005	04:04:30	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
12th August 2005	05:22:22	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
12th August 2005	06:07:18	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
12th August 2005	06:10:45	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
12th August 2005	13:07:31	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
12th August 2005	14:11:22	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
12th August 2005	23:22:34	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
13th August 2005	03:17:50	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
13th August 2005	04:13:41	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
13th August 2005	06:18:38	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
13th August 2005	06:18:42	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
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2	24th November 2005	16:27:45	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
3	24th November 2005	16:27:46	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
4	26th November 2005	18:43:28	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
5	27th November 2005	01:06:28	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
6	27th November 2005	08:33:41	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
7	27th November 2005	08:35:19	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
8	27th November 2005	08:35:39	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
9	27th November 2005	08:35:51	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
10	27th November 2005	22:16:19	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
11	27th November 2005	23:50:54	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
12	27th November 2005	23:51:16	home.datacomm.ch/rezamusik/angeloangelo/index.html home.datacomm.ch/rezamusik/index.html
13	27th November 2005	23:52:04	home.datacomm.ch/rezamusik/angeloangelo/index.html home.datacomm.ch/rezamusik/index.html
14	27th November 2005	23:52:15	home.datacomm.ch/rezamusik/angeloangelo/index.html home.datacomm.ch/rezamusik/index.html
15	28th November 2005	04:49:33	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
16	28th November 2005	13:51:11	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
17	30th November 2005	15:28:55	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
18	30th November 2005	15:30:24	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
19	30th November 2005	16:30:01	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
20	30th November 2005	16:35:12	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
21	1st December 2005	03:09:33	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
22	1st December 2005	15:40:01	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
23	1st December 2005	18:04:03	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
24	1st December 2005	19:28:12	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
25	2nd December 2005	01:23:33	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
26	2nd December 2005	01:23:46	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
27	2nd December 2005	03:31:01	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
28	2nd December 2005	03:31:08	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
	2nd December 2005	15:36:44	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
	2nd December 2005	17:07:32	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
	3rd December 2005	06:20:50	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
	4th December 2005	00:36:16	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
	4th December 2005	20:51:32	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
	4th December 2005	23:06:02	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/

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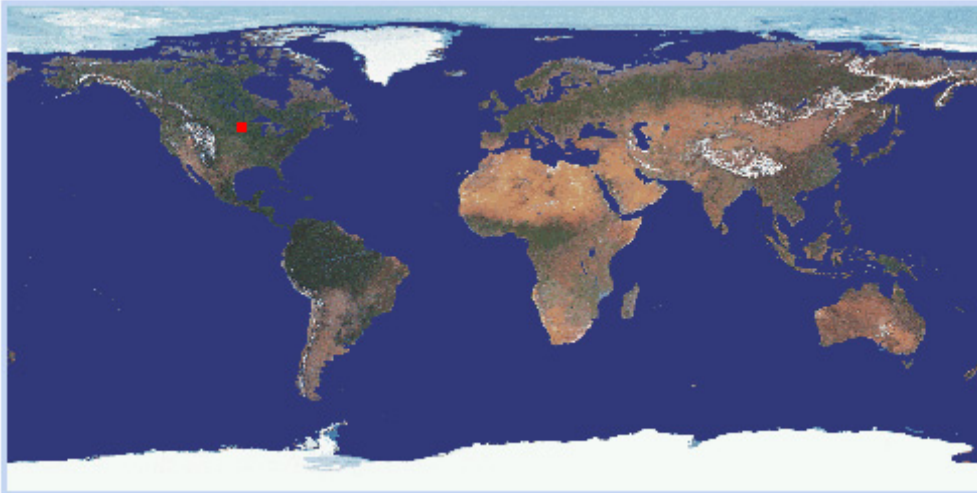
5th December 2005	01:54:51	No referring link
5th December 2005	14:03:21	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/

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EXHIBIT 4 - TIMEWARNER/ROADRUNNER VISITS

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Site visit statistics for Plaintiff's "web log" www.rezaworld.com, shedding light on the obsessive nature of the Defendants. These visits originated from the same online service providers, and in many cases, from the same exact IP addresses, as those of the Defendants who committed many of the aforementioned violations.



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VISITOR ANALYSIS	
Referring Link	http://www.rezaworld.com/
Host Name	CPE-70-92-166-167.mn.res.rr.com
IP Address	70.92.166.167
Country	United States
Region	Minnesota
City	Minneapolis
ISP	Road Runner
Returning Visits	8
Visit Length	Visit spread over more than one day
VISITOR SYSTEM SPECS	
Browser	MSIE 6.0
Operating System	Windows 98
Resolution	1024x768
Javascript	Enabled

Navigation Path

Date	Time	WebPage
24th July 2005	06:32:56	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com/
24th July 2005	22:05:55	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
27th July 2005	03:58:05	home.datacomm.ch/rezamusik/rezaworld/ rezaworld.com/
27th July 2005	07:32:20	home.datacomm.ch/rezamusik/rezaworld/ rezaworld.com/
27th July 2005	20:27:49	home.datacomm.ch/rezamusik/rezaworld/ rezaworld.com/
27th July 2005	23:20:18	home.datacomm.ch/rezamusik/rezaworld/ rezaworld.com/
27th July 2005	23:22:25	home.datacomm.ch/rezamusik/angeloangelo/ www.angeloangelo.com/
27th July 2005	23:22:47	home.datacomm.ch/rezamusik/angeloangelo/angeloangelo_cd_order.html home.datacomm.ch/rezamusik/angeloangelo/
27th July 2005	23:24:04	home.datacomm.ch/rezamusik/angeloangelo/angeloangelo_cd_order.html?tp=CONTINUE SHOPPING www.aitsafe.com/cf/add.cfm?userid=1759243&product=ANGELOANGELO%20--%20%28Euro%20price%20including%20shipping%20is%2017%20-%20CHF%20is%2025%29%2
27th July 2005	23:24:36	home.datacomm.ch/rezamusik/angeloangelo/ www.angeloangelo.com/

VISITOR ANALYSIS

Referring Link	http://rezaworld.com/
Host Name	CPE-70-92-166-167.mn.res.rr.com
IP Address	70.92.166.167
Country	United States
Region	Minnesota
City	Minneapolis
ISP	Road Runner
Returning Visits	51
Visit Length	Visit spread over more than one day

VISITOR SYSTEM SPECS

Browser	MSIE 6.0
Operating System	Windows 98
Resolution	1024x768
Javascript	Enabled

Navigation Path

Date	Time	WebPage
27th July 2005	03:58:05	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
27th July 2005	07:32:20	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
27th July 2005	20:27:49	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
27th July 2005	23:20:18	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
27th July 2005	23:22:25	home.datacomm.ch/rezamusik/angeloangelo/www.angeloangelo.com/
27th July 2005	23:22:47	home.datacomm.ch/rezamusik/angeloangelo/angeloangelo_cd_order.html home.datacomm.ch/rezamusik/angeloangelo/
27th July 2005	23:24:04	home.datacomm.ch/rezamusik/angeloangelo/angeloangelo_cd_order.html?tp=CONTINUE_SHOPPING www.aitsafe.com/cf/add.cfm?userid=1759243&product=ANGELOANGELO%20--%20%28Euro%20price%20including%20shipping%20is%2017%20-%20CHF%20is%2025%29%2
27th July 2005	23:24:36	home.datacomm.ch/rezamusik/angeloangelo/www.angeloangelo.com/
28th July 2005	04:36:33	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
28th July 2005	21:17:21	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
28th July 2005	21:18:47	home.datacomm.ch/rezamusik/angeloangelo/www.angeloangelo.com/
29th July 2005	04:37:39	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
29th July 2005	07:42:59	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
29th July 2005	19:01:13	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com

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29th July 2005	20:05:42	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
29th July 2005	20:09:09	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
29th July 2005	21:18:27	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
29th July 2005	22:10:45	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
29th July 2005	22:29:40	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
30th July 2005	01:46:07	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
30th July 2005	01:51:53	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
30th July 2005	01:55:02	64.233.167.104/search?q=cache:W7VqFB7SbwMJ:home.datacomm.ch/rezamusik/rezaworld/%22cyber+troll+of+minneapolis%22&hl=en&rls=GGLG,GGLG:2005-20.GGLG:en&q=%22cyber+troll+of+minneapolis%22
30th July 2005	01:59:48	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
30th July 2005	02:06:32	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
30th July 2005	03:01:31	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
30th July 2005	03:01:35	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
30th July 2005	03:03:36	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
30th July 2005	03:08:46	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
30th July 2005	03:10:09	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
30th July 2005	03:13:13	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
30th July 2005	03:23:46	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
30th July 2005	05:49:10	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
30th July 2005	08:45:26	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com/
30th July 2005	08:45:47	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
30th July 2005	08:51:19	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
30th July 2005	10:15:17	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
30th July 2005	21:19:54	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
30th July 2005	23:34:59	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
31st July 2005	00:03:36	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
31st July 2005	04:56:37	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
31st July 2005	04:57:54	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
31st July 2005	06:12:40	64.233.167.104/search?q=cache:Y2wSwMAU5_EJ:home.datacomm.ch/rezamusik/misc_general.html+reza+fireworks+qanjavi&hl=en&num=100&hl=en&safe=off&rls=GGLG,GGLG:2005-20.GGLG:en&q=reza+fireworks+qanjavi&spell=1
31st July 2005	09:00:55	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com/
31st July 2005	21:26:15	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
31st July 2005	22:32:25	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
31st July 2005	22:58:55	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
1st August 2005	06:10:53	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
1st August 2005	23:19:07	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
2nd August 2005	00:56:33	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
2nd August 2005	01:24:17	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com/
2nd August 2005	05:12:45	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com/
2nd August 2005	07:04:58	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
2nd August 2005	21:14:45	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
3rd August 2005	05:32:12	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
4th August 2005	03:26:08	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/

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4th August 2005	19:50:06	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
5th August 2005	00:38:28	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
5th August 2005	00:40:06	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
5th August 2005	00:41:36	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
5th August 2005	01:03:23	home.datacomm.ch/rezamusik/rezaworld/index_files/
5th August 2005	02:19:27	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
5th August 2005	03:01:16	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
5th August 2005	15:51:56	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
5th August 2005	19:54:55	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
5th August 2005	19:56:33	64.233.167.104/search?q=cache:W7VgFB7SbwMJ:home.datacomm.ch/rezamusik/rezaworld/%22Todd Tipton%22 reza&hl=en www.google.com/search?num=100&hl=en&lr=&safe=off&rls=GGLG%2CGGLG%3A2005-20%2CGGLG%3Aen&q=%22Todd Tipton%22 reza
6th August 2005	03:55:59	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
6th August 2005	18:44:33	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
6th August 2005	23:54:22	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
7th August 2005	05:18:36	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
7th August 2005	19:16:39	64.233.167.104/search?q=cache:W7VgFB7SbwMJ:home.datacomm.ch/rezamusik/rezaworld/%22todd tipton%22 reza&hl=en www.google.com/search?hl=en&q=%22todd tipton%22 reza
7th August 2005	19:17:38	64.233.167.104/search?q=cache:W7VgFB7SbwMJ:home.datacomm.ch/rezamusik/rezaworld/%22who like to abuse other people%22 reza&hl=en www.google.com/search?num=100&hl=en&lr=&safe=off&q=%22who like to abuse other people%22 reza
7th August 2005	19:19:38	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
7th August 2005	19:25:23	64.233.167.104/search?q=cache:W7VgFB7SbwMJ:home.datacomm.ch/rezamusik/rezaworld/%22who like to abuse other people%22 jealousy todd reza&hl=en www.google.com/search?num=100&hl=en&lr=&safe=off&rls=GGLG%2CGGLG%3A2005-20%2CGGLG%3Aen&q=%22who like to abuse other people%22 jealousy todd rez
7th August 2005	20:03:54	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
7th August 2005	21:34:11	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
7th August 2005	21:43:18	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
7th August 2005	23:09:40	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
8th August 2005	03:20:57	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
8th August 2005	23:28:31	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com/
9th August 2005	23:18:01	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
11th August 2005	17:08:36	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
12th August 2005	23:14:50	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
17th August 2005	20:20:12	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com
22nd August 2005	19:50:56	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com/
24th August 2005	04:04:47	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
28th August 2005	21:01:26	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com/
1st September 2005	01:36:33	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
2nd September 2005	04:26:35	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
7th September 2005	06:25:13	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com/
9th September 2005	03:24:40	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
9th September 2005	17:43:05	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com

10th September 2005	22:04:18	home.datacomm.ch/rezamusik/rezaworld/ rezaworld.com/
11th September 2005	02:34:15	home.datacomm.ch/rezamusik/rezaworld/ www.rezaworld.com
12th September 2005	04:59:07	home.datacomm.ch/rezamusik/rezaworld/ rezaworld.com/
12th September 2005	05:00:10	home.datacomm.ch/rezamusik/rezaworld/ rezaworld.com/

VISITOR ANALYSIS

Referring Link	http://rezaworld.com/
Host Name	CPE-24-26-182-157.mn.res.rr.com
IP Address	24.26.182.157
Country	United States
Region	Minnesota
City	Eden Prairie
ISP	Road Runner
Returning Visits	74
Visit Length	Visit spread over more than one day

VISITOR SYSTEM SPECS

Browser	MSIE 6.0
Operating System	Windows 98
Resolution	1024x768
Javascript	Enabled

Navigation Path

Date	Time	WebPage
15th September 2005	06:30:13	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
20th September 2005	00:41:45	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com/
28th September 2005	07:32:39	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com/
11th October 2005	18:49:03	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com/
12th October 2005	04:45:17	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com/
26th October 2005	06:04:26	home.datacomm.ch/rezamusik/rezaworld/ No referring link
28th October 2005	05:13:24	home.datacomm.ch/rezamusik/rezaworld/ No referring link
28th October 2005	21:15:07	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
29th October 2005	16:35:19	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
29th October 2005	23:48:34	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
30th October 2005	16:13:10	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
30th October 2005	23:20:23	home.datacomm.ch/rezamusik/rezaworld/ No referring link
31st October 2005	14:55:40	home.datacomm.ch/rezamusik/rezaworld/ No referring link
31st October 2005	18:13:49	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
1st November 2005	16:01:51	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com/
		home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
2nd November 2005	18:04:58	home.datacomm.ch/rezamusik/rezaworld/ No referring link
3rd November 2005	16:53:05	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
6th November 2005	01:50:00	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com/
7th November 2005	16:37:40	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com/
8th November 2005	17:46:19	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
10th November 2005	04:58:43	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
10th November 2005	04:59:00	home.datacomm.ch/rezamusik/rezaworld/rezaworld.com/
16th November 2005	02:58:50	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com/
19th November 2005	00:35:14	home.datacomm.ch/rezamusik/rezaworld/ No referring link
26th November 2005	20:40:21	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com/
27th November 2005	17:52:25	home.datacomm.ch/rezamusik/rezaworld/ No referring link
27th November 2005	23:09:59	home.datacomm.ch/rezamusik/rezaworld/ No referring link
6th December 2005	17:47:31	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com/
6th December 2005	17:48:52	home.datacomm.ch/rezamusik/rezaworld/www.rezaworld.com/

EXHIBIT 5 - EVIDENCE

Exhibit 5 contains ninety (90) pages of evidence filed separately with request for filing under seal.

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EXHIBIT 6 - COMPOSER LETTER

On 13 November 2005, the following was produced by Angelo Gilardino (www.angelogilardino.com), one of the greatest living composers of classical music, as a testimony of how he viewed the success of the Plaintiff's CD for which he composed:

TO WHOM IT MAY CONCERN

At the request of Mr Reza Ganjavi, guitarist, here below I give a faithful declaration of facts happened since 1999.

In my capacities as a composer, I was asked by Mr Ganjavi to write some melodies upon a popular piece for solo guitar, composed in an indefinite time on 19th century, and called in Spanish "Romance Anonimo" - because its author is so far unknown.

I wrote on 1999 seven different melodies, all of them having in common "Romance Anonimo" used no longer as a solo piece, but as an accompaniment. Each of the seven melodies was written for an instrument to be played in duo with the accompanying guitar.

Subsequently, Mr Ganjavi recorded the whole set of works - entitled "Canzoni dimenticate". Like all my compositions, they were published and copyrighted by Edizioni Musicali Bèrben, Ancona, Italia.

From such a recording, I have received from SIAE (Società Italiana Autori ed Editori) a share of royalties which makes me guessing that the record in question was produced in rather a high number of copies - considering the usual amount of copies for a record of classical guitar - in the order of some thousands.

Mr Ganjavi showed me a series of statements which warmly praised his CD.

Angelo Gilardino
Composer

Written at Vercelli, Italy, on November 13th, 2005.