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**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Liberty Media Holdings, LLC, a California Corporation)
Plaintiff,)
vs.)
FF Magnat Limited d/b/a Oron.com; Maxim Bochenko a/k/a Roman Romanov; and John Does 1-500,)
Defendants.)

Case No.: 2:12-cv-01057

**DECLARATION OF ERIKA DILLON IN
OPPOSITION TO DEFENDANTS'
EMERGENCY MOTION FOR
DISBURSEMENT OF FUNDS**

I, ERIKA DILLON, do hereby declare under the penalty of perjury:

1. I am over the age of 18 and am a resident of the State of Nevada.
2. I am employed by Plaintiff Liberty Media Holdings, LLC as an in-house paralegal and online investigator.
3. I have personal knowledge of the facts herein, and if called as a witness, could testify competently thereto.
4. I am familiar with Leaseweb from a number of different reports.
5. Since 2007, Leaseweb has been acknowledged online and by anti-piracy law enforcement agencies as the target of several investigations. They have frequently found themselves in the midst of legal actions because of the websites that they provide services to.

1 6. In 2007, BREIN, Bescherming Rechten Entertainment Industrie Nederland (which
2 translates roughly as “association for the Protection Rights for the Entertainment Industry [of the]
3 Netherlands”), pursued Leaseweb until the hosting company agreed to give up the identity of the
4 registered owner of Demonoid.com, a massive and popular BitTorrent tracker. It was reported that
5 Leaseweb’s agreement to disclose this information was not as effective as BREIN had hoped, as
6 Leaseweb allowed Demonoid.com to move its materials to a Canadian host prior to disclosing the
7 requested information to BREIN. A true and correct copy of a news article called “Leaseweb
8 Reveals Owner of Demonoid.com” is attached as Exhibit D.

9 7. Leaseweb has also served as the host for Megaupload and Diwana, two websites that
10 were recently shut down for being comprised primarily of pirated and illegal content. A true and
11 correct copies of news articles outlining Leaseweb’s services for the webistes are attached as
12 Exhibits E and F.

13 8. Megaupload operated more than 630 computer servers in the Netherlands through
14 Leaseweb’s services. Even prior to the criminal arrests and shutdown of the Megaupload network
15 of sites, it was widely known that Megaupload hosted a variety of infringing content. Despite this,
16 Alex de Joode, a “Security” Officer of Leaseweb has stated that Leaseweb never received
17 complaints about Megaupload’s service for abuse. A true and correct copy of an article called
18 “Megaupload mega customer Leaseweb” is attached as Exhibit G.

19 9. It is common knowledge online that Leaseweb works to ignore DMCA notices or at
20 the very least, minimize their impact. In a thread on WebHostingTalk.com from February 2011,
21 user “OT-Vexion” notes that he “was a client of leaseweb for a long time” and that despite
22 receiving “several DMCA notices” that were forwarded by Leaseweb, “I never heard anything
23 from [Leaseweb] about them, ever.” A true and correct copy of this thread is attached as Exhibit H.
24 OT-Vexion’s quote is on page 3 of the exhibit.

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1 10. In another thread on WebHostingTalk.com, this one from February 2012, a user
2 asks for assistance finding a host that will not comply with DMCA notices. The first response to
3 this question lists Leaseweb as a viable option for a host that would meet this requirement. A true
4 and correct copy of this thread is attached as Exhibit I.

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6 Dated this 29th day of June, 2012 in Las Vegas, Nevada.

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9 Erika Dillon

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