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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-01507

DECLARATION OF NATHAN GLASS IN SUPPORT OF PLAINTIFF’S REPLY IN SUPPORT OF MOTION TO ENFORCE SETTLEMENT

DECLARATION OF NATHAN GLASS IN SUPPORT OF PLAINTIFF’S REPLY IN SUPPORT OF MOTION TO ENFORCE SETTLEMENT

I, Nathan Glass, being over 18 years of age, having personal knowledge of the facts set forth herein, and being competent to testify to the same if called to do so at trial, state as follows:

1. I am the owner and principal of Takedown Piracy LLC, d/b/a Takedown Piracy, a California limited-liability company that identifies online copyright infringements and sends take-down notices pursuant to the Digital Millennium Copyright Act (“DMCA”), 17 U.S.C. § 512(c)(3)(A). I have operated this business for more than three (3) years.

1 2. I have sent thousands of take-down notices pursuant to 17 U.S.C. § 512(c)(3)(A)
2 (hereinafter, “DMCA notices”) to sites that host or provide access to copyright infringing files,
3 removing more than seven million instances of infringement.¹

4 3. One site that I have sent more than 1,500 DMCA notices to FF Magnat Limited’s
5 Oron.com service; these notices demanded the removal of 257,855 infringements found on
6 Oron.com.

7 4. My research indicates that FF Magnat Limited and its principals, officers,
8 employees and/or agents own two highly trafficked web forums that direct visitors to infringing
9 content, <www.pornbb.org> (“pornbb”) and <www.forumophilia.com> (“forumophilia”).

10 5. Since March 2011, my observation has been that these message boards have
11 primarily and almost exclusively allowed users to post links to Oron.com for visitors to access and
12 download copyright infringing files.

13 6. In my observations, FF Magnat Limited publicly masqueraded its ownership of
14 these sites, but my own observations lead to the conclusion that it owns both of them.

15 7. On February 17, 2011, Fedor Goncharov became the registrant of <pornbb.org>,
16 and listed support@oron.com as his contact e-mail address. I personally created a true and correct
17 copy of the historical WHOIS information for <pornbb.org> as it appeared February 17, 2011 on
18 June 25, 2012 by making a screen capture of the Domain Tools historical WHOIS report for that
19 domain name and date, and it is attached hereto as Declaration Exhibit A.

20 8. In addition to registering <pornbb.org> using an Oron.com e-mail address, the
21 connection between pornbb and FF Magnat Limited becomes even clearer based on the WHOIS
22 information displaying the registrant of Oron on April 7, 2006 as being Fedor Goncharov. I
23 personally created a true and correct copy of the historical WHOIS information for <oron.com> as
24 it appeared April 7, 2006 on June 25, 2012 by making a screen capture of the Domain Tools
25 historical WHOIS report for that domain name and date and it is attached hereto as Declaration
26 Exhibit B.

27 _____

28 ¹ See <http://takedownpiracy.com/stats/>

1 9. Around that time, pornbb put up a public poll stating that effective March 1, 2011
2 only five file hosts would be allowed on the site, and that the poll would decide which five hosts
3 that would be.

4 10. Although I had dealt with Oron in the past, it was far from the most popular
5 amongst the piracy crowd, based on both commentary I read from pirates on numerous blogs and
6 message boards, as well as the number of links I sent DMCA take-down notices to for Oron.com
7 relative to other file hosts.

8 11. The first days of the pornbb poll reflected this sentiment, as Oron.com was not in
9 the top five.

10 12. However, on the final day of the poll, Oron.com jumped up in the poll dramatically,
11 prompting the users to make accusations of being fixed.

12 13. At the same time, an Oron.com banner appeared on pornbb's main page, further
13 fueling speculation that the fix was in among users of pornbb, as reflected by their statements on
14 the website.

15 14. Any comments questioning the validity of the poll were removed from pornbb, and
16 many former forum moderators stated that they were quitting the site in protest.

17 15. Like pornbb, forumophilia primarily and almost exclusively uses links to Oron.com
18 to distribute content to its visitors and make infringing materials available for download.

19 16. Also like pornbb, forumophilia is a major forum for the discussion and piracy of
20 pornography. As its name – an abbreviation or “**forum of pedophilia**” – suggests, the links found
21 on forumophilia by all appearances contain more objectionable and potentially illegal content than
22 those on pornbb.

23 17. In addition to both forumophilia and pornbb almost exclusively using Oron.com
24 links despite the piracy community's dislike for its service, I have previously observed on
25 numerous prior occasions that typing “mail.forumophilia.com” into any web browser I use
26 redirected me to pornbb – a feature that FF Magnat Limited disabled after June 22, 2012, once this
27 litigation had commenced.

28

1 18. I cannot conceive of a set of circumstances where this would occur unless the same
2 entity owned both forumophilia and pornbb.

3 19. Finally, as of June 19, 2012 the registrant of <forumophilia.com> was Roman
4 Romanov – a defendant in this action. I personally created a true and correct copy of the historical
5 WHOIS information for <forumophilia.com> as it appeared June 19, 2012 on June 25, 2012 by
6 making a screen capture of the Domain Tools historical WHOIS report for that domain name and
7 date, and it is attached hereto as Declaration Exhibit C.

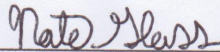
8 20. As seen in Declaration Exhibit C, the domain name <forumophilia.com> was
9 registered through a service called DOVEDO, with a contact website found at
10 <www.dovedo.com>.

11 21. While the contact information for <dovedo.com> has since been hidden by a privacy
12 service, a historical WHOIS information report shows that as of April 3, 2006, the registrant for
13 <dovedo.com> was Fedor Goncharov. I personally created a true and correct copy of the historical
14 WHOIS information for <dovedo.com> as it appeared April 3, 2012 on June 25, 2012 by making a
15 screen capture of the Domain Tools historical WHOIS report for that domain name and date, and it
16 is attached hereto as Declaration Exhibit D.

17 22. Thus, as seen in Declaration Exhibits A, B and D, Fedor Goncherov was, and
18 ostensibly still is, the registrant of <oron.com>, <pornbb.com> and <dovedo.com>, and as seen in
19 Declaration Exhibit C, defendant Roman Romanov was the registrant of <forumophilia.com> - a
20 domain name he registered using Goncherov's service offered through <dovedo.com>.

21
22 I declare under penalty of perjury that the foregoing is true and correct to the best of my
23 knowledge.

24
25 Dated: July 19, 2012 in Canoga Park, California.

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27 

28
Nathan Glass