

----- Original message -----

From: [REDACTED]  
Date: 6/20/16  
To: chaz@raineylegal.com; info@raineylegal.com  
Subject: Cox and Rainey Legal (Re: Illegal Downloading)

Dear Chaz Rainey,

Thank you for your quick response, and on a Sunday, no less.

While I don't disagree that something should be done about illegal downloading, I think your attack should be aimed at the actual downloaders, and not the guy that just rents the modem.

The way you're handling it, looks like a fishing expedition, followed up by a shakedown.

I did receive a few emails from Cox Communications over the last few months regarding illegal downloads.

I didn't know what they were talking about then, not sure what you're talking about now.

I didn't know it was illegal to have an unsecured network. I hadn't really given it any thought.

Not sure what you're saying, when you say I should reasonably police my Internet. Really?

There are 3 computers in this house that get alot of use, and it sounds like several more in the area around my house.

Should I start approaching some of these people in the house, and say, :Hey, what's going on over there?

Or maybe knock on a few doors in the neighborhood and ask randomly, "How did you like "Queen of The Desert" MF.?

I'll let you know what I hear.

Looking forward to my day in court, and I wish you guys the best of luck.

I hadn't heard of Queen of The Desert, but it's now on my list of movies to see this month.

Sincerely, [REDACTED]

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From: chaz@raineylegal.com  
To: [REDACTED] info@raineylegal.com  
Subject: Re: Cox and Rainey Legal  
Date: Mon, 20 Jun 2016

Mr. [REDACTED]

I am in receipt of your email dated June 18, 2016. Despite the arguments made in your email, my client QOTD Film Investment Ltd. (the "Plaintiff") is proceeding with its case against you and, in the absence of a settlement, will seek the highest possible award of damages allowable under the law. The subpoenaed information provided by your ISP, coupled with the data gathered from our third-party investigator, conclusively proves that your Internet access point was utilized to illegally download and disseminate the Plaintiff's motion picture entitled QUEEN OF THE DESERT. Meanwhile, further data gathered by our investigators shows that this was not an isolated instance. Indeed, the subject IP address, accessing the Internet from your home, is associated with dozens of illegal downloads.

While you may argue that you were unaware of the infringing activity occurring at your address, that is not a satisfactory excuse. Pursuant to your contract with your ISP, as well as under the laws governing contributory and vicarious copyright infringement, you are responsible for reasonably policing your Internet access point. Even if you were not directly responsible for the infringing activity, your failure to implement reasonable precautions for securing your Internet connection has enabled the unlawful pirating of our client's intellectual property.

Furthermore, I feel it necessary to explain that your threat to change Internet Service Providers holds no bearing on whether or not we move forward in prosecuting this case against you. The Plaintiff in this case is the producer of the above-referenced motion picture and has no affiliation with your ISP. The only reason that your ISP was contacted in this matter was to acquire data pertaining to the above-referenced IP address. Indeed, your ISP is legally obligated to cooperate with our investigation of this matter.

Consequently, the arguments set forth in your letter fail to provide any basis for dismissing my client's claims against you; nor do those arguments provide any grounds for reducing our original demand of Six Thousand dollars (USD\$6,000.00).

However, if you can prove a financial hardship or special circumstances to justify a reduction in our original demand, we are happy to work with you. For instance, we generally offer demand reductions for current or former members of the armed services. We also reduce our demand in cases where individuals can demonstrate (either through tax returns or W2 statements) that their household income is below the median income for the region.

My client's goal is simple: to stop Internet piracy. To this end, we have structured our financial demands to be high enough so as to strongly discourage defendants from engaging in any future infringing activity, meanwhile encouraging those some defendants to implement reasonable precautions against future infringements utilizing their internet access points.

Industry estimates claim that Internet Piracy annually causes up to \$250 billion dollars in damage to our nation's entertainment industry and accounts for the loss of more than 750,000 jobs. While many groups dispute the exact extent of the economic damage caused by Internet Piracy, analysts, academics and policy experts generally agree that Internet Piracy is a net loss for our nation's economy.

We strongly encourage you to consult with an attorney to review your rights and risk exposure in connection with this matter. If you fail to address this demand, we will proceed to name you as a defendant in the above-referenced case and seek the highest possible award of damages against you.

Chaz Rainey Esq./MBA/LL.M.

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From: [REDACTED]

Sent: Saturday, June 18, 2016

To: chaz@raineylegal.com; info@raineylegal.com

Subject: Cox and Rainey Legal

Dear Rainey Legal,

Just got your paperwork regarding an illegal download of Queen of The Desert, and your demand for 6000 dollars as settlement of this matter.

I have no idea who illegally downloaded that. I have two kids who have said it's not them. We have alot of traffic in this house, including several of their friends. Everyone I have asked has no idea who illegally downloaded that.

We had an unsecured network, before we put in a password last month.

Good luck in the prosecution of this case. I will not be sending you 6000 dollars anytime soon, and it will be my pleasure to see you in court, and to cancel my service with Cox, and transfer to AT and T. I'll also share your paperwork with the local media.

Sincerely,

[REDACTED]