

**Civil Action No. 2:16-cv-928-APG-GWF
SUMMONS IN A CIVIL ACTION**

**Joe W. Townsend (an individual)
4470 Vegas Valley Dr. #45
Las Vegas, NV, 89121-1914**

**RAINEY LEGAL GROUP PLLC
9340 W. Martin Ave, 2nd Floor
Las Vegas, NV, 89148**

AUG, 16, 2016

Re; Letter before claim dated Aug. 1, 2016 concerning a motion picture entitled Queen of the Desert.

Dear Sir/Madam,

I am writing to you regarding your letter dated Aug 1, 2016, stating that my connection was used in an infringement of copyright which allegedly occurred during a vague, actually unspecified period of time, approximately between Jan, 26, 2016 and Feb, 18, 2016 and concerns the work "Queen of the desert".

You assert in your letter that the infringement was apparently traced to my internet connection. Your letter states that you have assumed that I was the person who carried out the alleged infringing acts. I do not consider that an assumption is a valid basis for a claim of liability. You have failed to state why I would be liable if such an infringement had indeed occurred.

Nevertheless, I categorically deny any offense under the sections you cited in your letter. I have never possessed a copy of the work in any form, nor have I made a copy, nor have I distributed it, nor have I authorized anyone else to distribute or copy it using my internet connection or computer. I note that the Act you cited requires a person to directly infringe copyright, or authorize someone else to do so. I have done neither, and you have not provided and evidence of my doing so.

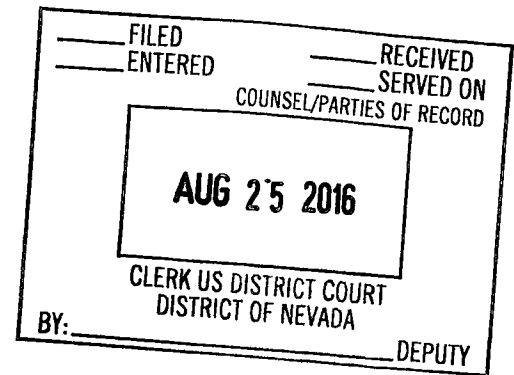
Furthermore, I note that under the Act, copyright is only infringed if the restricted acts are carried out in relation to the whole or any substantial part of the work. You have not provided any evidence that such an infringement has actually taken place.

If you wish to continue to assert that an infringement has taken place, then, in accordance with my entitlement as part of a pre-action procedure, I formally request a copy of any report, spreadsheet or data you hold which demonstrates that such an infringement took place via my connection or computer (including what substantial part of the work was involved, or if it were the whole) and any information gathered as with whom the work was successfully shared via my connection (and the extent to which it was shared in each instance, if there were more than one).

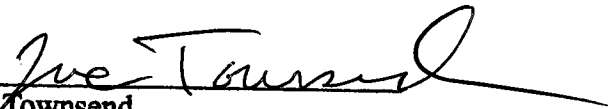
I have no basis on which I could assert that any individual has used my connection or my computer unlawfully to infringe your copyright. I am no therefore able to provide any details in that matter. As you seem to be perfectly aware, it is impossible to link an IP address to a particular person or computer without further detailed analysis, which requires a level of expertise I do not possess. I am told that the delay in your sending of a letter and the reality of domestic router technology would, in any case, preclude any such analysis.

Your failure to supply any evidence in support of a valid claim under the Act means there is little to answer. Simply, you have asserted that an infringement took place which I did not carry out or authorize, and you have provided no evidence to support any assertion to the contrary. I do not have the expertise to provide a detailed explanation. As such I can only conclude that I have been a victim of foul play.

Please be aware that if you do choose to pursue this matter, I will seek to recover all my costs to the maximum permitted by the Civil Procedure Rules.



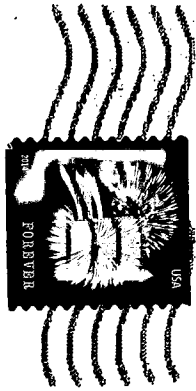
The signature of the undersigned confirms the statement provided to be accurate and legally binding under the terms required by pre-action procedure in civil law.


Joe Townsend

DOE TOWNSEND
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LAS VEGAS, NV. 89121

LAS VEGAS NV 890

23 AUG 2016 PM 2 1



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LAS VEGAS, NV. 89101

RE: ANSWER CANO. 2:16CV-928-APG-GWF.

89101-706934

