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9 Attorneys for Plaintiffs
10 TWENTIETH CENTURY FOX; COLUMBIA
PICTURES; PARAMOUNT PICTURES; WARNER
11 BROS.; COLUMBIA TRISTAR HOME
ENTERTAINMENT; and NEW LINE PRODUCTIONS

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 TWENTIETH CENTURY FOX FILM
16 CORPORATION, a Delaware
corporation; COLUMBIA PICTURES
17 INDUSTRIES, INC., a Delaware
corporation; PARAMOUNT PICTURES
18 CORPORATION, a Delaware
corporation; WARNER BROS.
19 ENTERTAINMENT INC., a Delaware
corporation; COLUMBIA TRISTAR
20 HOME ENTERTAINMENT, INC., a
Delaware corporation; and NEW
21 LINE PRODUCTIONS, INC., a
Delaware corporation,

22 Plaintiffs,

23 vs.

24 DOES 1 - 12,

25 Defendants.
26

CASE NO. C 04-04862 WHA

**DECLARATION OF KAREN R.
THORLAND IN SUPPORT OF RENEWED
MISCELLANEOUS ADMINISTRATIVE
REQUEST FOR LEAVE TO TAKE
DISCOVERY PRIOR TO RULE 26
CONFERENCE**

27 I, Karen R. Thorland, hereby declare:
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1 1. I am an associate with the law firm of Loeb & Loeb LLP,
2 attorneys of record for Plaintiffs. I am one of the attorneys
3 primarily responsible for prosecuting this lawsuit. I am an
4 attorney licensed to practice law in this State, a member in good
5 standing of the State Bar of California, and admitted before this
6 Court. I have personal knowledge of the facts set forth herein,
7 and if called upon, could and would testify competently to each
8 of them.

9 2. Plaintiffs joined Defendants in this action because
10 each defendant gained access to the Internet through Pacific Bell
11 Internet Services ("Pacific Bell").

12 3. As more fully set forth in the declarations of Thomas
13 Mizzone and Chad Tilbury filed concurrently with Plaintiffs'
14 initial Miscellaneous Administrative Request, Defendants'
15 identities are presently unknown to Plaintiffs. Plaintiffs have
16 identified each defendant by the unique IP address assigned to
17 him or her by Pacific Bell on the date and at the time of
18 infringement. However, Plaintiffs are unable to ascertain the
19 Defendants' true identities. Only Pacific Bell, through
20 reference to its subscriber activity logs, can conclusively
21 identify Defendants.

22 4. Internet Service Providers ("ISPs") have different
23 policies regarding retention of their subscriber activity logs.
24 Many ISPs keep subscriber activity logs for only limited periods
25 of time -- sometimes as little as weeks or even days -- before
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1 erasing the data they contain.

2 5. Once Plaintiffs have obtained Defendants' true names
3 and contact information, to the extent appropriate, Plaintiffs
4 will if necessary sever this action and proceed against each
5 defendant separately.

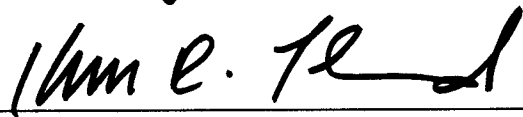
6 I declare under penalty of perjury that the foregoing is
7 true and correct.

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9 Executed on November, 30th, at Los Angeles, California.

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Karen R. Thorland

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