

Fratar, Kern, Kelly, LLP shall furnish copy with J.C.R. 83.2(d)

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

*J.M. Faucella
12/2/11*

HARD DRIVE PRODUCTIONS, INC.)
Plaintiff)
Vs.)
DOES 1 - 1,495)
Defendants)

DOCKET NO. 1:11-cv-01741-JDB

DEFENDANT, MILDRED LAPORTE'S MOTION TO QUASH

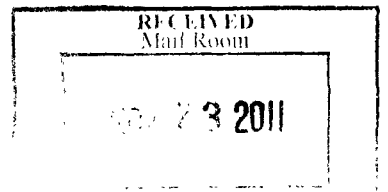
The Defendant, Mildred Laporte, in the above-captioned matter respectfully requests this Honorable Court to quash the subpoena pursuant to Fed.R.Civ.P. (b), and to vacate the order of the Court allowing said subpoena on October 4, 2011.

As grounds therefor, the Defendant states that a person cannot be commanded to produce material he neither controls nor possess. *Wright & Miller, Sec. 2454, at 425.*

As further grounds, the Defendant just retained the undersigned counsel to ascertain whether this commercial information that is sought has any other protection under the common or statutory law of privileged or protected materials.

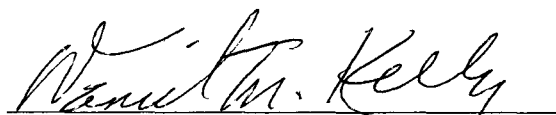
THE DEFENDANT

By: *Daniel M. Kelly*
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CERTIFICATE OF SERVICE

I, Daniel M. Kelly, Esq. do hereby certify that I have caused a true copy of the within document to be served upon the Comcast by mailing and facsimile 1-866-947-5587, and John Steel, Esq., Steele Hansmeier, PLLC, attorney for Plaintiff, by mailing and email at jlsteele@wefightpiracy.com this Twenty-first day of November, 2011.



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