

1 PHILLIP A. BAKER, BAR ID #169571
 2 pbaker@bknlawyers.com
 3 DANIEL P. LEONARD, BAR ID #194268
 4 dleonard@bknlawyers.com
 5 DERRICK S. LOWE, BAR ID #267998
 6 dlowe@bknlawyers.com
 7 BAKER, KEENER & NAHRA, LLP
 8 633 West 5th Street
 9 Suite 5400
 10 Los Angeles, California 90071
 11 Telephone: (213) 241-0900
 12 Facsimile: (213) 241-0990

13 Specially Appearing for
 14 PAUL HANSMEIER

15 **UNITED STATES DISTRICT COURT**
 16 **CENTRAL DISTRICT OF CALIFORNIA**

17 **INGENUITY 13 LLC,**

18 **Plaintiff,**

19 **vs.**

20 **JOHN DOE,**

21 **Defendant.**

Case No.: 2:12-CV-8333-ODW (JCx)

Judge: Hon. Otis D. Wright, II
 Magistrate Judge:

Hon. Jacqueline Chooljian

Courtroom: 11

Complaint Filed: 09-27-2012

Trial Date: None Set

**JOINDER TO PAUL DUFFY,
 ANGELA VAN DEN HEMEL,
 AND PRENDA LAW, INC'S
 RESPONSE TO PUTATIVE
 JOHN DOE'S REPLY BRIEF**

22 COMES NOW, Specially Appearing Paul Hansmeier (“Hansmeier”), who
 23 hereby joins the Response to Putative John Doe Reply Brief (“Reply Brief”)
 24 submitted by Prenda Law Group, Paul Duffy and Angela Van Den Hemel.

25 In addition, Hansmeier points out to the Court that the only “evidence”
 26 presented in the Reply Brief that purports to implicate Hansmeier is, in fact, pure
 27 speculation. The Putative John Doe makes much of the fact that “metadata”
 28 contained in certain documents submitted in the case indicates that the documents

1 were accessed at some point by a person using the identifier: “Paul”. Reply at 6.
2 There is no information as to the length of time that “Paul” spent on the document
3 or, indeed, whether “Paul” drafted or modified the document. The Putative John
4 Doe is inviting this Court to speculate that the “Paul” in the metadata is Paul
5 Hansmeier. On the other hand, there is solid evidence before this Court showing
6 that Mr. Gibbs was responsible for the filings in this case, as in all California cases,
7 as he asserted in the declaration he filed in Florida which is attached to
8 Hansmeier’s Response to Order to Show Cause.
9
10
11
12

13 DATED: April 18, 2013

BAKER, KEENER & NAHRA, LLP

14 By /S/ PHILLIP A. BAKER
15 PHILLIP A. BAKER
16 DANIEL P. LEONARD
17 DERRICK S. LOWE
18 Specially Appearing for
19 PAUL HANSMEIER
20
21
22
23
24
25
26
27
28