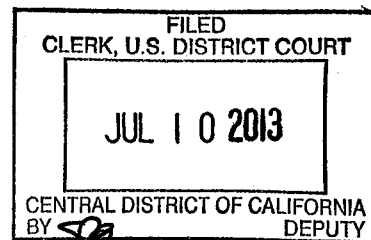


1 Paul Duffy
161 N. Clark St. Ste 3200
2 Chicago, Illinois 60601

3 *Pro se*



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6 UNITED STATES DISTRICT COURT
7 CENTRAL DISTRICT OF CALIFORNIA

8
9 INGENUITY 13 LLC,

10 *Plaintiff,*

11 v.

12 JOHN DOE,

13 *Defendant.*

CASE NO. 2:12-CV-8333-ODW (JCx)

Judge: Hon. Otis D. Wright, II
Magistrate Judge: Hon. Jacqueline Chooljian
Courtroom: 11

Complaint Filed: September 27, 2012
Trial Date: None set

14
15 **MEMORANDUM OF POINTS AND**
16 **AUTHORITIES IN SUPPORT OF EX**
17 **PARTE APPLICATION FOR**
STIPULATED ORDER REDUCING
APPELLATE BOND AMOUNT IN
LIGHT OF RECENT NINTH CIRCUIT
CONSOLIDATING ORDER

18
19 On July 9, 2013, the Ninth Circuit issued an order *sua sponte* consolidating eight appeals
20 from this action and ordering the submission of a consolidated brief, to the extent practicable. In
21 light of this development, the undersigned respectfully requests the Court to enter an administrative
22 order reducing the amount of the appellate bond to reflect the putative John Doe's appellate costs
23 calculation. The putative John Doe's calculated appellate costs are as follows:

24 \$5,000 in hard costs plus \$45,000 in attorneys' fees to defend the
25 initial appeal. However, this case has been appealed by seven
26 different parties, each of whom has undertaking [sic] their own,
27 separate appeal. Accordingly, Doe has proposed security for each
28 additional appeal (after the first one) in the amount of \$15,000
each. $\$50,000 + (\$15,000 \times 6) = \$140,000$ to secure costs on
appeal, per Fed. R. App. Proc. 7.

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

INGENUITY 13 LLC,
Plaintiff,

v.
JOHN DOE,
Defendant.

CASE NO. 2:12-CV-8333-ODW (JCx)

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

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age.
My business address is 2 N. La Salle St. St., 13th Floor, Chicago, IL 60602. I have caused service of:

**PAUL DUFFY'S MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT
OF EX PARTE APPLICATION FOR STIPULATED ORDER REDUCING
APPELLATE BOND AMOUNT IN LIGHT OF RECENT NIGHT CIRCUITE
CONSOLIDATING ORDER**

On the following parties via U.S. Mail first-class, postage prepaid:

PARTIES	COUNSEL OF RECORD/PRO SE
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6881 Forensics, LLC Springates East Government Road Charlestown, Nevis	Pro Se
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I declare under penalty of perjury that the foregoing is true and correct. Executed on July 10, 2013.



Signature