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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA

AF HOLDINGS,

Plaintiff,

v.

RAJESH PATEL

Defendant.

Civil Action No: 2:12-00262-WCO

**PLAINTIFF’S REQUEST FOR  
PRODUCTION TO DEFENDANT**

**PROPOUNDING PARTY: AF HOLDINGS**

**RESPONDING PARTY: RAJESH PATEL**

TO DEFENDANT RAJESH PATEL AND HIS COUNSEL OF RECORD

Plaintiff AF HOLDINGS (“PLAINTIFF”) by and through its undersigned counsel of record, hereby propounds the following Request for Production upon the Defendant, RAJESH PATEL (“DEFENDANT”), to answer fully, under oath, and in accordance with the applicable rules, subject to the instructions and definitions set forth below. Per the FRCP, the responses to these requests *must be* returned to Plaintiff’s attorney within 30 days. The responses must be sent back to Plaintiff’s counsel at: Jacques Nazaire, 125 Town Park Drive, Suite 300, Kennesaw, GA 30144.

**DEFINITIONS**

- I. “**COMPUTER DEVICES**” means any device capable of storing and/or processing electronic data, including, but not limited to, any computer, laptop, desktop, hard drive, external storage device, iPod, iPad, PDA, iPhone, or Blackberry

1 II. **“DOCUMENT”** or **“DOCUMENTS”** mean each and every original or copy  
2 of words or information generated by printing, typing, longhand, electronic  
3 recording, or other process, regardless of the form thereof, and include any  
4 kind of “writing”. Such documents include, but are not limited to, published  
5 materials, reports, correspondence, emails, records, memoranda, notices,  
6 notes, marginal notations, messages, teletype printouts, statements, books,  
7 studies, minutes, diagrams, drawings, maps, surveys, plans, charts, graphs,  
8 data, computer files, computer tapes, computer diskettes, computer printouts,  
9 computer hard drives, appointment books, telephone message tapes,  
10 telephone message slips, drafts, checks, money orders, invoices, billings,  
11 evaluations, photographs, audio tapes, and videotapes.

12 III. Where knowledge or information in possession of DEFENDANT is  
13 requested, such request includes knowledge of that DEFENDANT’S agents,  
14 representatives, and, unless privileged, DEFENDANT’S attorney. When an  
15 answer is made by a corporate affiliate of DEFENDANT, state the name,  
16 address, and title of persons supplying the information and making the  
17 affidavit, and announce the source of his or her information.

18 IV. **“COMPLAINT”** means the document entitled, in part, “Complaint,” which  
19 was originally filed in this action to initiate the legal proceedings in this  
20 case.

21 V. **“ISP”** means Internet Service Provider.  
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- 1 VI. **“IP ADDRESS”** means the unique number assigned to DEFENDANT by  
2 DEFENDANT’S ISP at the date/time described in the COMPLAINT.  
3
- 4 VII. **“INTERNET ACCOUNT”** means the Internet Service provided to an  
5 individual by his or her ISP.  
6
- 7 VIII. **“UNAUTHORIZED”** means without permission; as applied here, it refers  
8 to the access of Plaintiff’s website without paying money to Plaintiff, as is  
9 required for permissive access to Plaintiff’s website.  
10
- 11 IX. **“HACK,” “HACKING”** and/or **“HACKED”** means gaining access without  
12 legal authorization to a computer or computer system, and, specifically in  
13 this situation, using a username/password that was not properly obtained  
14 through a payment to PLAINTIFF for accessing PLAINTIFF’S WEBSITES  
15 and/or for accessing PLAINTIFF’S WEBITES without PLAINTIFF’S  
16 permission to view the content of PLAINTIFF’S WEBSITES.  
17
- 18 X. **“DATE/TIME OF THE HACK”** refers to the specific date and time that  
19 PLAINTIFF observed DEFENDANT’S IP ADDRESS using a HACKED  
20 username/password combination to HACK into PLAINTIFF’S  
21 WEBSITE(S) as was fully alleged in the COMPLAINT.  
22
- 23 XI. **“IDENTIFY”** means to name an individual and/or entity, one’s current  
24 home address (or business address), one’s previous addresses for the  
25 previous five (5) years, one’s social security number (or Employer  
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1 Identification Number), date of birth (or date of organization), and, if an  
2 individual, one's marital status and employer's name and address.

3  
4 XII. "PORNOGRAPHIC OR PORNOGRAPHY" means videos, pictures,  
5 printed or other media containing the explicit description or display of  
6 sexual organs or activity.  
7

8 **REQUESTS FOR PRODUCTION**

9 **REQUEST FOR PRODUCTION NUMBER 1**

10 Any and all documents, things and/or electronically stored information relating  
11 to services rendered and/or communication given to YOU by YOUR ISP with respect  
12 to YOUR INTERNET ACCOUNT over the past three (3) years.  
13

14 **REQUEST FOR PRODUCTION NUMBER 2**

15 A digital copy of all data that was stored, retrieved, downloaded, restored,  
16 reconstructed, removed, deleted, salvaged, regenerated and/or forensically extracted  
17 from the COMPUTER DEVICES or their storage media belonging to YOU or of  
18 those COMPUTER DEVICES located at YOUR residence and/or work that are  
19 reasonably accessible to you.  
20  
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22 **REQUEST FOR PRODUCTION NUMBER 3**

23 All documents, things, and/or electronically stored information arising from  
24 and/or relating to persons that YOU believe could have accessed YOUR COMPUTER  
25 DEVICES and HACKED Plaintiff's website.  
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1 **REQUEST FOR PRODUCTION NUMBER 4**

2 All documents, things, and/or electronically stored information arising from  
3 and/or relating to any communications between YOU and any other person with  
4 respect to the COMPUTER DEVICES.  
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6 **REQUEST FOR PRODUCTION NUMBER 5**

7 All documents, things, and/or electronically stored information arising from  
8 and/or relating to the COMPUTER DEVICES.  
9

10 **REQUEST FOR PRODUCTION NUMBER 6**

11 All documents, things, and/or electronically stored information arising from  
12 and/or relating to any communications between YOU and any other person with  
13 respect to the this case.  
14

15 **REQUEST FOR PRODUCTION NUMBER 7**

16 DOCUMENTS relating to the methods, processes, utilities, and applications  
17 used by YOU on the COMPUTER DEVICES.  
18

19 **REQUEST FOR PRODUCTION NUMBER 8**

20 DOCUMENTS relating to the YOUR qualifications with respect to the use of  
21 the COMPUTER DEVICES.  
22

23 **REQUEST FOR PRODUCTION NUMBER 9**

24 All DOCUMENTS pertaining to the COMPUTER DEVICES.  
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1 **REQUEST FOR PRODUCTION NUMBER 10**

2 Any and all floppy disks, CD-ROMS, hard drives, or any other storage media  
3  
4 pertaining to the COMPUTER DEVICES.

5 **REQUEST FOR PRODUCTION NUMBER 11**

6 All floppy disks, CD-ROMS, hard drives, or any other storage media pertaining  
7  
8 to the master image of any drive generated from the COMPUTER DEVICES.

9 **REQUEST FOR PRODUCTION NUMBER 12**

10 Any and all DOCUMENTS relating to costs and fees billed to YOU for services  
11  
12 and/or products with respect to the COMPUTER DEVICES.

13 **REQUEST FOR PRODUCTION NUMBER 13**

14 Any and all DOCUMENTS relating to the IP ADDRESS assigned to YOU by  
15  
16 YOUR ISP.

17 **REQUEST FOR PRODUCTION NUMBER 14**

18 Any and all DOCUMENTS relating to the hash and original drive hash with  
19  
20 respect to the COMPUTER DEVICES.

21 **REQUEST FOR PRODUCTION NUMBER 15**

22 Any and all DOCUMENTS relating to the chain of custody with respect to the  
23  
24 COMPUTER DEVICES.

25 **REQUEST FOR PRODUCTION NUMBER 16**

26 Any and all DOCUMENTS relating to the storage and/or destruction of files  
27  
28 and applications on the COMPUTER DEVICES.

1 **REQUEST FOR PRODUCTION NUMBER 17**

2 Any and all DOCUMENTS relating to the forensic analysis of the COMPUTER  
3 DEVICES by YOU.  
4

5 **REQUEST FOR PRODUCTION NUMBER 18**

6 The actual computer or router which supplied free wireless access to your  
7 customers at your gas station, referred to in your declaration dated March 4, 2013.  
8

9 **REQUEST FOR PRODUCTION NUMBER 19**

10 Any and all documents, things, and/or electronically stored information arising  
11 from and/or relating to any communications between YOU and any other person with  
12 respect to the COMPLAINT and/or this lawsuit.  
13

14 **REQUEST FOR PRODUCTION NUMBER 20**

15 Any and every hard drive of a COMPUTER DEVICES that had access to your  
16 INTERNET ACCOUNT over the past two years.  
17

18 Respectfully Submitted,

19 AF HOLDINGS, LLC  
20

21 **DATED: August 1, 2013**

22 By: /s/ Jacques Nazaire  
23

24 JACQUES NAZAIRE [BAR # 142388]  
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26 Kennesaw, GA 30144  
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