MISCELLANEOUS CASE COVER SHEET

If yes, give date & Case No. NATURE OF CASE [] M 08-85 Motion to Compel [] M 26-2 Application to Enforce Administrative Order Rule 5A Rule of Division of Business among Distri Judges [] M 08-86 Internet Infringement [] M 28-86 Suretice Sproceedings [] M 08-88 Surety Companies [] M 28-86 Suretice Proceedings [] M 11-03 SEC Litigation to Freeze Account [] M 11-188 Subpoenas - Habeas Corpus [] M 11-188 Subpoenas - Habeas Corpus [] M 18-86 Forfeiture Proceedings - Funds Held in trust. 28 USC 1746 [] M 18-302 Registration of a Judgment from Another District [] M 18-305 Registration of Student Loan Judgment [] M 18-305 Registration of Student Loan Judgment [] M 39-86 General Bonds in Admiralty Purs. to Local Admiralty Rule 8 [] M 19-63 Receivers - Property in Other Districts [] M 19-63 Receivers - Property in Other Districts [] M 19-73 Denial to Sue In Forma Pauperis [] M 42-1 Designation by U.S. Attorney of Individual to accept service of summons and complaint	PLAINTIFFS	DEFENDANTS
No? Yes? Judge Previously Assigned	Attorney's (Firm Name, Address, and Telephone Number)	Attorneys (If Known)
If yes, was this case: Vol. Invol. Dismissed. No Yes If yes, give date	DESCRIPTION OF CASE	Has this or a similar case been previously filed in SDNY ?
NATURE OF CASE [] M 08-85 Motion to Compel [] M 08-85 Motion to Quash [] M 08-86 Internet Infringement [] M 08-88 Surety Companies [] M 11-03 SEC Litigation to Freeze Account [] M 11-188 Subpoenas - Habeas Corpus [] M 11-189 Subpoenas - Habeas Corpus [] M 11-88 Sub of Unclaimed Seamen's' Effects [] M 18-302 Registration of a Judgment from Another District [] M 18-302 Registration of a Judgment from Another District [] M 18-305 Registration of Student Loan Judgment [] M 19-88 General Bonds in Admiralty Purs. to Local Admiralty Rule 8 [] M 19-68 General Bonds in Admiralty Purs. to Local Admiraty Rule 8 [] M 19-68 Denial to Sue In Forma Pauperis [] M 22-1 Designation by U.S. Attorney of Individual to accept service of summons and complaint		If yes, was this case: Vol. Invol. Dismissed. No Yes
 M 08-85 Motion to Compel M 08-85 Motion to Quash M 08-85 Motion to Quash M 08-86 Nutron to Quash M 11-03 SEC Litigation to Freeze Account M 11-188 Subpoenas - Habeas Corpus M 11-189 Subpoenas - Habeas Corpus M 11-189 Subpoenas - Habeas Corpus M 18-88 Sale of Unclaimed Seamen's' Effects M 18-302 Registration of a Judgment from Another District M 18-304 Administrative Subpoena Proceedings M 18-305 Registration of Student Loan Judgment M 18-305 Registration of Student Loan Judgment M 18-306 Registration of Student Loan Judgment M 18-307 Mainalty Rule 8 M 19-58 General Bonds in Admiralty Purs. to Local Admiralty Rule 8 M 19-58 General Bonds in Admiralty Purs. to Local Admiralty Rule 8 M 19-58 General Bonds in Admiralty Purs. to Local Admiratly Rule 8 M 19-63 Receivers - Property in Other Districts M 19-78 Denial to Sue In Forma Pauperis M 22-1 Designation by U.S. Attorney of Individual to accept service of summons and complaint M 20 Deportation <		If yes, give date& Case No
 M 08-85 Motion to Quash M 08-86 Internet Infringement M 08-86 Surety Companies M 08-88 Surety Companies M 08-88 Surety Companies M 08-88 Surety Companies M 08-82 Sureties Proceedings M 11-03 SEC Litigation to Freeze Account M 11-188 Subpoenas - Habeas Corpus M 11-189 Subpoenas - Habeas Corpus M 18-66 Forfeiture Proceedings - Funds Held in trust. 28 USC 1746 M 18-302 Registration of a Judgment from Another District M 18-304 Administrative Subpoena Proceedings M 18-305 Registration of Student Loan Judgment M 18-305 Registration of Student Loan Judgment M 19-50 Offer Authorizing IRS Officer to Enter Premises for Levy M 19-63 Receivers - Property in Other Districts M 19-78 Denial to Sue In Forma Pauperis M 22-1 Designation by U.S. Attorney of Individual to accept service of summons and complaint M 20 0 D extention of indivend biding the different M 20 0 D extention of indivend the different 	NATURE OF CASE	
 copies in bankruptcy part [] M 23 Petition to Perpetuate Testimony [] M 25-1 Order for Entry to Effect Levy - IRS Matter [] M 47B Transmission of Proposed Findings of Fact a Conclusions of Law 	 M 08-85 Motion to Quash M 08-86 Internet Infringement M 08-88 Surety Companies M 08-425 Sureties Proceedings M 11-03 SEC Litigation to Freeze Account M 11-188 Subpoenas - Habeas Corpus M 11-189 Subpoenas - Habeas Corpus M 16-88 Sale of Unclaimed Seamen's' Effects M 18-66 Forfeiture Proceedings - Funds Held in traze USC 1746 M 18-302 Registration of a Judgment from Another District M 18-305 Registration of Student Loan Judgment M 18-305 Registration of Student Loan Judgment M 18-26 Order Authorizing IRS Officer to Enter Premises for Levy M 19-58 General Bonds in Admiralty Purs. to Loca Admiralty Rule 8 M 19-78 Denial to Sue In Forma Pauperis M 22-1 Designation by U.S. Attorney of Individual accept service of summons and complaint M 23 Petition to Perpetuate Testimony M 25-1 Order for Entry to Effect Levy - IRS Matter M 25-2 Permission to have access to safe deposit 	 M 28 Warrant for Entry & Inspection of Premises M 29 Privacy Act Application M 30 Privacy Act Application M 30 Privacy Act Application M 31 Order of Commodity Exchange Commission Directing Person to Pay Money M 32 Petition for Writ to Produce Federal Prisoner in State Court M 33 Inspection Warrant - Department of Energy M 34 Order of Another District Court that the State Court Produce M 35 Order to Stay Transfer of Federal Prisoner M 36 National Labor Relations Board M 37 Application to Re-Open Civil Case(s) that are more than 25 years old M 38 Application for Discovery and Inspection of Defendant Detained in Federal Prison M 41 Order of Return of 28:2254/2255 Petition M 43 Contempt of Court in Bankruptcy I M 43 Contempt of Court in Bankruptcy M 44 Claim Compensation under Longshoremen & Harbor Workers Compensation Act M 46 Order From Another District for Public Viewing M 47 Bankruptcy Cases - Before Appeal Filed M 47 Bankruptcy Cases - Before Appeal Filed M 47 Bankruptcy Cases - Before Appeal Filed M 48 Application for Appointment of Coursel - No Case

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NATURE OF CASE CONTINUED

- [] M 51 Order to Show Cause Case Being Transferred from Northern District of New York
- [] M 52 Application for Leave to File a Complaint
- [] M 53 Order Barring Individual from Entering Courthouse Building
- [] M 54 Immigration Naturalization Order Delaying Deportation
- [] M 55 Petition for Appointment of Impartial Umpire Labor Management Relations Act and Others
- [] M 58 Application for Extension of Time to File Petition for Removal
- [] M 59 Application to Produce Federal Prisoner in State Court
- [] M 67 Notice of Eviction to Squatters (USA Cases)

- [] M 71 Application re: Federal Rules Cr. 11(e)(2)
 - [] M 72 Order of Attachment of Another District EDNY
 - [] M 73 Subpoena to Government Agency
 - [] M 75 Application for Writ of Garnishment
 - [] M 76 Central Violations Bureau
 - [] M 77 Application to have subpoena issued to person living in this district regarding action in foreign country or tribunal
 - [] M 90 Order of Attachment
 - M 93 Letters Rogatory
 - [] M 94 Other _____

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DO YOU CLAIM THIS CASE IS RELATED TO A MISCELLANEOUS CASE NOW PENDING IN THE SDNY? IF SO, STATE:

JUDGE ______MISCELLANEOUS CASE NUMBER _____

NOTE: Please submit at the time of filing an explanation of why cases are deemed related

PLAINTIFF(S) ADDRESS(ES) AND COUNTY(IES)

DEFENDANT(S) ADDRESS(ES) AND COUNTY(IES)

DEFENDANT(S) ADDRESS UNKNOWN

REPRESENTATION IS HEREBY MADE THAT, AT THIS TIME, I HAVE BEEN UNABLE, WITH REASONABLE DILIGENCE, TO ASCERTAIN THE RESIDENCE ADDRESSES OF THE FOLLOWING DEFENDANTS:

CHECK ONE:	AT LEAST ONE PARTY IS PRO SE No	Yes
CHECK ONE:	THIS ACTION SHOULD BE ASSIGNED TO W	
DATE	SIGNATURE OF ATTORNEY OF RECORD	ADMITTED TO PRACTICE IN THIS DISTRICT
RECEIPT #		YES (DATE ADMITTED MO YR) ATTORNEY BAR CODE #
Ruby J. Krajick,	Clerk of Court,	Dated

Paul D. Polidoro, Esq. WATCH TOWER BIBLE AND TRACT SOCIETY OF PENNSYLVANIA Legal Department 200 Watchtower Drive Patterson, NY 12563-9204 Telephone: 845-306-0711 Facsimile: 845-306-0709 Email: inboxLGLipg@jw.org

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

In Re DMCA Subpoena to Google, LLC.	X Case No. 7:20-mc-00119
	Watch Tower Bible and Tract Society's Request to the Clerk for Issuance of Subpoena to Google LLC, Pursuant to 17 U.S.C. § 512(h) to Identify Alleged Infringer

Petitioner, Watch Tower Bible and Tract Society of Pennsylvania (hereinafter "Watch Tower") through its undersigned counsel of record, hereby requests that the Clerk of this Court issue a subpoena to Google, LLC to identify alleged infringers at issue, pursuant to the Digital Millennium Copyright Act ("DMCA"), 17 U.S.C. § 512(h) (hereinafter the "DMCA Subpoena"). The proposed DMCA Subpoena is attached hereto as Exhibit A.

The DMCA Subpoena is directed to Google LLC, the service provider of a YouTube account to which the infringing party using the name "JW Apostate" (https://www.youtube.com/channel/UC09GQmDAFGLmaffWo16ETPg) posted content.

1 Watch Tower's Request To The Clerk For Issuance of DMCA Subpoena

Case 7:20-mc-00119-CS Document 2 Filed 02/27/20 Page 2 of 3

Watch Tower conducted a good-faith fair use analysis of numerous infringing posts on the account at issue. The following URLS represent a sample of the infringing content posted to the YouTube account at issue:

- <u>https://www.youtube.com/watch?v=S_272yXlc8g</u>
- <u>https://www.youtube.com/watch?v=R1puwJAdUQg</u>
- <u>https://www.youtube.com/watch?v=R8tnpTpC1oc</u>
- <u>https://www.youtube.com/watch?v=emQqLZBAJ3g&feature=youtu.be</u>
- <u>https://www.youtube.com/watch?v=HSfILHwtOS0</u>

This content infringes copyrights held by Watch Tower. (See Declaration of Paul

D. Polidoro dated February 27, 2020 (hereinafter "Polidoro Decl.").

Watch Tower has satisfied the requirements for issuance of a subpoena pursuant

to 17 U.S.C. § 512(h), namely:

- Watch Tower has submitted copies of notifications sent pursuant to 17
 U.S.C. § 512(c)(3)(A) as Exhibit 1 to the Declaration of Paul D.
 Polidoro.
- Watch Tower has submitted the proposed DMCA Subpoena attached hereto as Exhibit A; and
- (3) Watch Tower, through its counsel of record, has submitted a sworn declaration confirming that the purpose for which the DMCA subpoena is sought is to obtain the identity of an alleged infringer or infringers, and that such information will only be used for the purpose of protecting Watch Tower's rights under Title 17 U.S.C. §§ 100, et.

seq.. See Polidoro Decl., ¶ 4.

Having complied with the statutory requirements, Watch Tower respectfully requests that the Clerk expeditiously issue and sign the proposed DMCA Subpoena pursuant to 17 U.S.C. § 512(h)(4).

Dated: February 27, 2020

/s/ Paul D. Polidoro Paul D. Polidoro Associate General Counsel SDNY Bar No. PP2509 WATCH TOWER BIBLE AND TRACT SOCIETY OF PENNSYLVANIA Legal Department 200 Watchtower Drive Patterson, NY 12563-9204 Telephone: 845-306-0711 Facsimile: 845-306-0719 Email: inboxLGLipg@jw.org Attorney for Plaintiff Case 7:20-mc-00119-CS Document 2-1 Filed 02/27/20 Page 1 of 5

EXHIBIT A

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

In re: DMCA Section 512(h) Subpoena Google, LLC

CIVIL ACTION NO. 7:20-mc-00119

SUBPOENA TO PRODUCE DOCUMENTS OR INFORMATION PURSUANT TO 17 U.S.C. § 512(h)

To: Custodian of Records for: Google LLC, 1600 Amphitheater Parkway, Mountain View, California 94043 by and through its registered agent Corporation Service Company, 2710 Gateway Oaks Drive, Suite 150N, Sacramento, CA 95833.

YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, and electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

All identifying information, including subscriber registration information, the name(s), address(es), telephone number(s), any electronic mail addresses associated with the infringing YouTube account displaying the name, "JW Apostate"

(https://www.youtube.com/channel/UC09GQmDAFGLmaffWo16ETPg), and any logs of Internet Protocol addresses including time stamps used to access the subject account or to upload the documents available at the following URLs :

> https://www.youtube.com/watch?v=S_272yXlc8g https://www.youtube.com/watch?v=R1puwJAdUQg https://www.youtube.com/watch?v=R8tnpTpC1oc https://www.youtube.com/watch?v=emQqLZBAJ3g& feature=youtu.be https://www.youtube.com/watch?v=HSflLHwtOS0

Place: Watch Tower Bible and Tract Society of Pennsylvania Legal Department 200 Watchtower Drive	Date and Time: April 15, 2020 10:00 am
Patterson, NY 12563-9204	

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

CLERK OF THE COURT

Date:

Signature of Clerk or Deputy Clerk

The name, address, e-mail address, and telephone number of the attorney representing, Watch Tower Bible and Tract Society of Pennsylvania, who issues or requests this subpoena is Paul D. Polidoro, Associate General Counsel, Watch

Case 7:20-mc-00119-CS Document 2-1 Filed 02/27/20 Page 3 of 5

Tower Bible Tract Society of Pennsylvania, Legal Department. 200 Watchtower Dr. Patterson, NY 12563-9204, inboxLGLipg@jw.org, 845-306-0711.

Notice to the person who issues or requests this subpoena A notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Case 7:20-mc-00119-CS Document 2-1 Filed 02/27/20 Page 4 of 5

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

(date)			
? I served the	subpoena by delivering a copy to the na	amed person as follows:	
		on (date) ;	or
⁷ I returned th	ne subpoena unexecuted because:		
tendered to the	witness the fees for one day's attendand	d States, or one of its officers or agents, I ice, and the mileage allowed by law, in the	
\$			
fees are \$	for travel and \$	for services, for a total of \$	0.00
I declare under	penalty of perjury that this information	is true.	
e:		Server's signature	
		Printed name and title	

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

(A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or

(B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

(ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

(A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections*. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

 $({\bf i})$ shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or

must organize and label them to correspond to the categories in the demand. **(B)** Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as

trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

For access to subpoena materials, see Fed. R. Civ. P. 45(a) Committee Note (2013).

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

In Re DMCA Subpoena to Google LLC	X Case No. 7:20-mc-00119
	Declaration of Paul D. Polidoro in Support of Watch Tower Bible and Tract Society's Request to the Clerk for Issuance of Subpoena to Google LLC, Pursuant to 17 U.S.C. § 512(h) to Identify Alleged Infringer

PAUL D. POLIDORO, counsel of record for Petitioner Watch Tower Bible and Tract Society of Pennsylvania (hereinafter "Watch Tower") in the above-referenced matter, hereby declares as follows:

- 1. I am authorized to act on behalf of Watch Tower.
- I submit this declaration in support of Watch Tower's request for issuance to Google LLC of a subpoena, pursuant to the Digital Millennium Copyright Act ("DMCA") 17 U.S.C. § 512(h) (hereinafter "DMCA Subpoena"), to identify the user identified as: "JW Apostate" (<u>https://www.youtube.com/channel/UC09GQmDAFGLmaffWo16ETPg</u>).
- 3. Pursuant to 17 U.S.C. § 512 (c)(3)(A), Watch Tower submitted notifications to Google LLC identifying the infringing content posted by the aforementioned user and providing the information required by 17 U.S.C. § 512 (c)(3)(A). True and accurate copies of the submitted notifications are attached hereto as Exhibit 1.
- 4. The purpose for which this DMCA Subpoena is sought is to obtain the identity of an alleged infringer or infringers and such information will only be used for the purpose of protecting Watch Tower's rights under title 17 U.S.C. §§ 100, *et. seq.*

I declare under penalty of perjury under the laws of the State of New York and the United States of America that the foregoing is true and correct. Executed this 27 day of February 2020.

lal N. I.d.

Paul D. Polidoro

Associate General Counsel SDNY Bar No. PP2509 WATCH TOWER BIBLE AND TRACT SOCIETY OF PENNSYLVANIA Legal Department 200 Watchtower Drive Patterson, NY 12563-9204 Telephone: 845-306-0711 Facsimile: 845-306-0709 Email: inboxLGLipg@jw.org Attorney for Plaintiff Case 7:20-mc-00119-CS Document 5-1 Filed 02/27/20 Page 1 of 3

EXHIBIT "1"

From:	InboxLGLIPG
Sent:	Thursday, February 27, 2020 9:50 AM
То:	Copyright@YouTube.com
Subject:	YouTube Notice of Infringement by: JW Apostate

RE: YouTube Notice of Infringement by: <u>JW Apostate</u>

Dear Sir/Madam:

I represent Watch Tower Bible and Tract Society of Pennsylvania ("Watch Tower"). It has come to our attention that you are reproducing and distributing Watch Tower's intellectual property illegally and without authorization.

Below is the information needed for you to identify the unauthorized display of Watch Tower's intellectual property.

Channel Name: JW Apostate

Description of allegedly infringed work: My Company, organization, or client's video (not from YouTube)

Title of Work On Youtube	URL	Link to Lawful Display of the Work on Watch Tower's Site
Congregation Accounting Training Videos #2	https://www.youtube.com/watch?v=S_272yXlc8g	Not Currently available of Watch Tower's site
How Can You Support LDC?	https://www.youtube.com/watch?v=R1puwJAdUQg	Not Currently available of Watch Tower's site
Congregation Accounting Training Videos # 1	https://www.youtube.com/watch?v=R8tnpTpC1oc	Not Currently available of Watch Tower's site
Whose Leadership Can You Trust?	https://www.youtube.com/watch?v=emQqLZBAJ3g&feature=youtu.be	Not Currently available of Watch Tower's site

			Contraction Contraction Contraction			
Title of Work On Youtube	Case 7:20-mc-00	THA-C2	Document 5-1	Filed 02/27/20	Page 3 of 3	Link to
						Lawful
						Display
						of the
						Work on
						Watch
						Tower's
						Site
Choose Your Apps Wisely		https://w	/ww.youtube.com/w	vatch?v=HSfILHwtC	SO	Not
Choose Your Apps Wisely		https://w	/ww.youtube.com/w	vatch?v=HSfILHwtC	<u>SO</u>	Not Currently
Choose Your Apps Wisely		https://w	ww.youtube.com/w	vatch?v=HSfILHwtC	<u>S0</u>	
Choose Your Apps Wisely		https://w	/ww.youtube.com/v	vatch?v=HSflLHwtO	<u>so</u>	Currently
Choose Your Apps Wisely		<u>https://w</u>	/ww.youtube.com/w	vatch?v=HSflLHwtO	<u>SO</u>	Currently available
Choose Your Apps Wisely		<u>https://w</u>	/ww.youtube.com/w	vatch?v=HSfILHwtO	<u>SO</u>	Currently available of Watch
Choose Your Apps Wisely		<u>https://w</u>	/ww.youtube.com/w	vatch?v=HSfILHwtC	<u>so</u>	Currently available of Watch Tower's
Choose Your Apps Wisely		https://w	/ww.youtube.com/w	vatch?v=HSfILHwtC	<u>so</u>	Currently available of Watch Tower's

We hereby request that you take all steps necessary to immediately remove the infringing materials from your website. Advise us in writing within ten (10) days of the date of this letter whether or not you will take the requested action.

I have a good faith belief that use of the materials in the manner complained of is not authorized by the copyright owner, its agent, or the law.

I hereby state under penalty of perjury that this information is accurate, and that I am authorized to act on behalf of the owner of the infringed materials.

Sincerely,

Paul Polidoro

Paul Polidoro Associate General Counsel

Intellectual Property Owner: Watch Tower Bible and Tract Society of Pennsylvania Company: Watch Tower Bible and Tract Society of Pennsylvania Address: 200 Watchtower Drive City, State, and Zip: Patterson, NY 12563 Name and Title: Paul Polidoro, Associate General Counsel Attorney Address: 200 Watchtower Drive, Patterson, NY 12563 Email Address: InboxLGLCopyright@jw.org Telephone: 845-306-1000 UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK -----X IN RE DMCA SUBPOENA TO GOOGLE, LLC

Case No. 7:20-mc-00119

-----Х

ORDER GRANTING SUBPOENA

This matter comes before the Court upon the ex parte application of movant Watch Tower Bible and Tract Society of Pennsylvania along with the Declaration of Paul D. Polidoro, Esq. and supporting documents for the signing of a Subpoena directing Google, LLC to produce the identity of entities or persons believed to be infringing on the copyright of Watch Tower Bible and Tract Society of Pennsylvania.

Having considered the Declaration and all documents submitted in support of the instant application, the Court finds good reason to issue an order directing the clerk to issue said subpoena and it is therefore:

ORDERED that the clerk of this Court shall issue the Subpoena for Google, LLC as sought by the movant.

DATED: 2/28/2020

SO ORDERED.

CATHY SEIBEL, U.S.D.J.

The Clerk of Court is respectfully directed to terminate the case.