

**KARISH & BJORGUM, PC**

A. ERIC BJORGUM (State Bar No. 198392)

Eric.bjorgum@kb-ip.com

MARC KARISH (State Bar No. 205440)

Marc.karish@kb-ip.com

119 E. Union Street, Suite B

Pasadena, CA 91103

Telephone: (213) 785-8070

Facsimile: (213) 995-5010

Attorneys for Plaintiff

MG PREMIUM LTD.

**UNITED STATES DISTRICT COURT  
IN AND FOR THE CENTRAL DISTRICT OF CALIFORNIA**

MG PREMIUM LTD, a limited liability  
company organized under the laws of  
the Republic of Cyprus,

Plaintiff,

vs.

NGUYEN HOI AND DOES 1-20, d/b/a  
PORNEZ.net

Defendants.

Case No. 2:23-cv-00349-CBM-PVC

**DECLARATION OF ANDREAS  
ALKIVIADES ANDREOU IN  
SUPPORT OF PLAINTIFF MG  
PREMIUM LTD.'S MOTION FOR  
DEFAULT JUDGMENT AGAINST  
DEFENDANT NGUYEN HOI**

Date: August 7, 2023

Time: 10:00 AM

Judge: Honorable Consuelo B. Marshall

Courtroom: 8D (350 W. 1st Street)

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DECLARATION OF ANDREAS ALKIVIADES ANDREOU

I, Andreas Alkiviades Andreou, under penalty of perjury of the laws of the United States, declare and state as follows:

1. I am a Citizen of the Republic of Cyprus, over the age of 18 years old, make this declaration based upon personal knowledge and, if called to testify could and would testify competently to the facts set forth herein.

2. I am a director of Plaintiff MG Premium Ltd. (“MG Premium”) and authorized to act on its behalf.

3. MG Premium Ltd. is a private limited liability company organized under the laws of the Republic of Cyprus and its head office in Cyprus. MG Premium Ltd. owns and operates of the largest portfolios of premium adult-oriented audiovisual content in the world.

4. Attached hereto as Exhibit A is a list of copyright registrations filed with the United States Copyright Office and owned by MG Premium Ltd. specific to videos which were discovered to be displayed on PornEZ.net without license or authority. Each of these registrations were obtained before the infringements on PornEZ.net occurred.

5. MG Premium Ltd. earns money on these, and other, videos by the display of the videos to paid members of paid membership websites owned and/or operated by MG Premium Ltd., wherein users pay a monthly fee to have access to MG Premium Ltd.’s copyrighted works.

6. These videos are not intended for viewing for free or by persons that are not paid members of MG Premium Ltd.’s web sites.

7. MG Premium Ltd.’s paid membership web sites include brazzers.com, realitykings.com, men.com, seancody.com, mofos.com, digitalplayground.com, babes.com, twistys.com, lilhumpers.com, bromo.com, realitydudes.com, and trueamateurs.com.

1           8.     Membership to MG Premium Ltd.'s web sites range in cost from \$9.99  
2 per month to \$39.99 per month.

3           9.     Potential MG Premium Ltd users will, in all likelihood, not pay monthly  
4 rates for the right to access and view content that is available for free.

5           10.    MG Premium Ltd goes to great lengths to obtain high quality movies,  
6 which are in turn desired by MG Premium Ltd.'s customers. It therefore additionally  
7 hurts MG Premium Ltd.'s brand if MG Premium Ltd.'s videos are associated with  
8 low quality movies.

9           11.    MG Premium Ltd. invests human and technological resources and incurs  
10 considerable expenses to commission and broadcast high quality movies. It hurts MG  
11 Premium Ltd.'s ability to continue broadcasting new high-quality movies if MG  
12 Premium Ltd.'s videos are accessible for free because it hinders its ability to earn  
13 income.

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15                   I declare under penalty of perjury under the laws of the United States of  
16 America that the foregoing is true and correct.

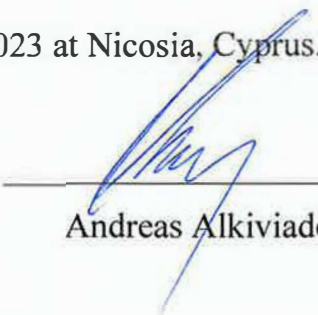
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18                   Executed this 9th day of June, 2023 at Nicosia, Cyprus.

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Andreas Alkiviades Andreou

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