



Fischer Law, P.L.

Jason A. Fischer, Esq.
Licensed to Practice in Florida and California

DMR

CV21-80062-MISC

March 22, 2021

Via Federal Express Delivery (Tracking No. 773225417504)

FILED

MAR 23 2021

Clerk of Court
United States District Court
Northern District of California
Phillip Burton Federal Building & United States Courthouse
450 Golden Gate Avenue, 16th Floor
San Francisco, California 94102

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

Re: ***In re. Loureda: DMCA Subpoena
Commanding Production by Reddit, Inc.
New Miscellaneous Case Filing***

Dear Sir or Madam:

Title 17 of the United States Code, Section 512(h), specifies that any person authorized to act on behalf of a copyright holder may request the clerk of any United States district court to issue a subpoena to an online service provider for identification of an alleged infringer in accordance with the Digital Millennium Copyright Act ("DMCA").

This law firm has the privilege of representing Valerie Loureda, owner of the copyrights in and to certain materials that have been infringed through use of the online services provided by Reddit, Inc. ("Reddit"). Enclosed with this letter, you will find a copy of Ms. Loureda's original notice of alleged infringement to Reddit. Upon information and belief, a representative of Reddit is located within the jurisdiction of this Court who has access to the identities of the Reddit users responsible for this infringement of Ms. Loureda's copyrights.

In addition to the original notice of infringement, you will also find a proposed subpoena and the required affidavit concerning use of the information sought. Pursuant to the DMCA, we respectfully request that you execute the enclosed subpoena directing Reddit's records custodian to disclose the users' identities, and then use the FedEx prepaid return label provided to return a copy of the subpoena to our offices in Miami, Florida. A check in the amount of \$49.00 to cover the filing fee to open the miscellaneous case is also enclosed.

DMCA Subpoena

March 22, 2021

Page 2 of 2

Please feel free to contact the undersigned by phone or email should you require anything more to honor this request. Thank you in advance for your assistance with this matter.

Sincerely,



Jason A. Fischer



Jason Fischer <jason@fischerlawpl.com>

Notice of Copyright Infringement

1 message

Jason Fischer <jason@fischerlawpl.com>

Sat, Mar 20, 2021 at 1:54 PM

To: copyright@reddit.com

Bcc: thresher@gmail.com

Dear Sir or Madam,

This firm is counsel to the MMA fighter and social media influencer Valerie Loureda, owner of all copyrights in and to the photos and video content published through her premium fan site and other social media channels.

It has come to the attention of Ms. Loureda that copies of her copyrighted content have been reproduced and published on Reddit.com. This infringing content can be found on the following URLs:

https://www.reddit.com/r/VaLoureda/comments/m8zqey/_/?ref=share&ref_source=link
<https://preview.redd.it/nmng69pt44o61.jpg?width=960&crop=smart&auto=webp&s=30e5546acdf2a1ebb1fc88dfc20ded1b9b034f10>
<https://preview.redd.it/by3yn9pt44o61.jpg?width=960&crop=smart&auto=webp&s=21363b0d4b8b2c8d0975413b06982e82e36ab7d0>
<https://preview.redd.it/875f99pt44o61.jpg?width=960&crop=smart&auto=webp&s=22ebbf94c2abdd1df5e8c00c685935540076654e>
<https://preview.redd.it/fkqdv8pt44o61.jpg?width=960&crop=smart&auto=webp&s=8d7ee77963185d7b22d7861d4f4825a0b3943121>
<https://preview.redd.it/5kvvh8pt44o61.jpg?width=960&crop=smart&auto=webp&s=f45832734e8cac542d13f8e80010c31944394e19>
https://www.reddit.com/r/VaLoureda/comments/m7f0jy/_/?ref=share&ref_source=link
https://www.reddit.com/r/VaLoureda/comments/m7euhr/_/?ref=share&ref_source=link
<https://preview.redd.it/1grq538dcon61.jpg?width=373&auto=webp&s=0de761f554f57d1a3837800c1bd88282f50988e1>
https://www.reddit.com/r/VaLoureda/comments/m7dvbv/_/?ref=share&ref_source=link
https://www.reddit.com/r/VaLoureda/comments/m7eei5/low_quality_but_tryna_contribute/?ref=share&ref_source=link
https://cdn.discordapp.com/attachments/819287105875869697/821841416200257546/RPReplay_Final1615859386.mp4
<https://cdn.discordapp.com/attachments/819287105875869697/819287155015811172/video0.mp4>
https://www.reddit.com/r/VaLoureda/comments/m7d7hr/_/?ref=share&ref_source=link
<https://preview.redd.it/jrwsuhqvyn61.jpg?width=750&auto=webp&s=712758283d7d2e696281d8880b49099a731b1511>
https://www.reddit.com/r/VaLoureda/comments/m6w1k6/_/?ref=share&ref_source=link
<https://preview.redd.it/bb62b36x0jn61.jpg?width=585&auto=webp&s=0a53e8960779bc451b86f8ce9b56a99a44bb80d2>
https://www.reddit.com/r/VaLoureda/comments/m6tcxw/better_crop_for_this_pic/?ref=share&ref_source=link
<https://preview.redd.it/fpqcwejtwen61.jpg?width=320&crop=smart&auto=webp&s=fdea46780e13d3dd4f6419fb2b997f37a83f9089>
<https://preview.redd.it/xj7xcmktwen61.jpg?width=320&crop=smart&auto=webp&s=eeca872d3f83b38be9a46300778d5e1cc742d40d>
https://www.reddit.com/r/VaLoureda/comments/m6c7m8/_/?ref=share&ref_source=link
<https://preview.redd.it/yh7rx6l7mbn61.jpg?width=354&auto=webp&s=8801f6ffe7c730e3ea2d4cc33cb7114c9e542d4c>
https://www.reddit.com/r/VaLoureda/comments/m61abv/_/?ref=share&ref_source=link
<https://preview.redd.it/56z5y8qw0sm61.jpg?width=576&auto=webp&s=93051aa62cfe8eb209a760dad6444e71e268e0a5>
https://www.reddit.com/r/VaLoureda/comments/m443m5/dm_preview_for_one_coming_later_today/?ref=share&ref_source=link
<https://preview.redd.it/s8hl41kyntm61.jpg?width=320&crop=smart&auto=webp&s=8eafc48243a3c0d2d2bac9641fe57fed40ebd879>
<https://preview.redd.it/4vnua1kyntm61.jpg?width=320&crop=smart&auto=webp&s=9fe3a2f7ae4db810766595669e342ac65f1bb371>

<https://preview.redd.it/0iifd0kyntm61.jpg?width=320&crop=smart&auto=webp&s=6e8297a7de4f6873fe9e529a391bad3dcccdd9bf7>

https://www.reddit.com/r/VaLoureda/comments/m49nlq/ass_for_days/?ref=share&ref_source=link

<https://preview.redd.it/6q8jwxw548m61.jpg?width=354&auto=webp&s=3a33338a0f506d6806267e54fd2b64a8a5aa966b>

https://www.reddit.com/r/VaLoureda/comments/m20qem/_/?ref=share&ref_source=link

<https://preview.redd.it/norimbmw2m61.jpg?width=354&auto=webp&s=c5b96b222eceed6e4f5b8d43fb008b79a7c5aaef>

https://www.reddit.com/r/VaLoureda/comments/m1htl0/_/?ref=share&ref_source=link

<https://preview.redd.it/cvgxisigavl61.jpg?width=576&auto=webp&s=455683b1b2122796461a6b60466f6a726bd04f78>

https://www.reddit.com/r/VaLoureda/comments/m0prb2/dm_from_today/?ref=share&ref_source=link

This copyrighted material was captured from Ms. Loureda's fan site (<https://www.loveloureda.com/>) without permission and has similarly been reproduced and published on [Reddit.com](https://www.reddit.com/) without permission. Accordingly, we respectfully request that you remove the above-described copyrighted materials from your site.

Please accept this communication and my statement, on behalf of Ms. Loureda, as copyright owner, that I have a good-faith belief that the use of the above-described copyrighted materials is not authorized by Ms. Loureda, her agent, or the law. The information in this notification is accurate, and I swear, under penalty of perjury, that I am authorized to act on behalf of the owner of an exclusive right that is infringed. Should you require additional information, please feel free to contact me by response to this correspondence or at:

Jason A. Fischer
Fischer Law, P.L.
2 South Biscayne Blvd., Suite 2600
Miami, Florida 33131
305-306-3995

Please reply to me confirming that this material has been removed from public access.

Thank you for your attention to this matter and your anticipated cooperation.

Yours very truly,

/s/Jason A. Fischer

By typing "/s/" followed by my name above, I hereby adopt that electronic signature as my own, pursuant to 15 U.S.C. § 7001 (the "ESIGN Act"), and affirmatively consent to its use as such.

Confidentiality Notice: This communication, including attachments, contains information that is confidential and protected by the attorney/client or other privileges. It constitutes non-public information intended to be conveyed only to the designated recipient(s). If the reader or recipient of this communication is not the intended recipient, an employee or agent of the intended recipient who is responsible for delivering it to the intended recipient, or you believe that you have received this communication in error, please notify the sender immediately by return e-mail and promptly delete this e-mail, including attachments without reading or saving them in any manner. The unauthorized use, dissemination, distribution, or reproduction of this e-mail, including attachments, is prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) is not a waiver of any attorney/client or other privilege.



Jason Fischer <jason@fischerlawpl.com>

Notice of Copyright Infringement

1 message

Jason Fischer <jason@fischerlawpl.com>
To: copyright@reddit.com

Mon, Mar 22, 2021 at 12:06 PM

Dear Sir or Madam,

This firm is counsel to the MMA fighter and social media influencer Valerie Loureda, owner of all copyrights in and to the photos and video content published through her premium fan site and other social media channels.

It has come to the attention of Ms. Loureda that copies of her copyrighted content have been reproduced and published on [Reddit.com](https://www.reddit.com). This infringing content can be found on the following URLs:

<https://i.redd.it/nchp2viinlo61.jpg>

<https://i.redd.it/du8wpkfnlo61.jpg>

<https://i.redd.it/6k4izz26nlo61.png>

https://www.reddit.com/r/LRDA/comments/maqg46/titty_play/

[reddit.com/r/LRDA/comments/maqf7/that_smother_doe/](https://www.reddit.com/r/LRDA/comments/maqf7/that_smother_doe/)

https://www.reddit.com/r/LRDA/comments/maqfif/yellow_thong/

https://www.reddit.com/r/LRDA/comments/maqf5w/lets_hope_this_sub_stays/

This copyrighted material was captured from Ms. Loureda's fan site (<https://www.loveloureda.com/>) without permission and has similarly been reproduced and published on [Reddit.com](https://www.reddit.com) without permission. Accordingly, we respectfully request that you remove the above-described copyrighted materials from your site.

Please accept this communication and my statement, on behalf of Ms. Loureda, as copyright owner, that I have a good-faith belief that the use of the above-described copyrighted materials is not authorized by Ms. Loureda, her agent, or the law. The information in this notification is accurate, and I swear, under penalty of perjury, that I am authorized to act on behalf of the owner of an exclusive right that is infringed. Should you require additional information, please feel free to contact me by response to this correspondence or at:

Jason A. Fischer

Fischer Law, P.L.

2 South Biscayne Blvd., Suite 2600

Miami, Florida 33131

305-306-3995

Please reply to me confirming that this material has been removed from public access.

Thank you for your attention to this matter and your anticipated cooperation.

Yours very truly,

/s/Jason A. Fischer

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AFFIDAVIT

**STATE OF FLORIDA
COUNTY OF MIAMI-DADE**

Before me, the undersigned authority, personally appeared Jason A. Fischer, who is personally known to me, and after being duly sworn, stated:


1. My name is Jason A. Fischer.
2. On March 22, 2021, I prepared and submitted a subpoena (the "Subpoena"), pursuant to 17 U.S.C. § 512(h), to the Clerk of the U.S. District Court for the Northern District of California.
3. I do swear under penalty of perjury that the Subpoena sought is to obtain the identity of alleged copyright infringers and that such information will only be used for the purpose of protecting the copyrights of Valerie Loureda.
4. I have personal knowledge of all facts set forth in this Affidavit.
5. The facts set forth in this Affidavit are true and correct.


FURTHER AFFIANT SAYETH NAUGHT.

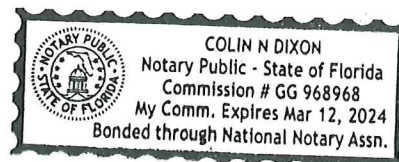


JASON A. FISCHER

SWORN TO AND SUBSCRIBED before me on March 22, 2021, by Jason A. Fischer, who is personally known to me.



Notary Public
Print Name: 



UNITED STATES DISTRICT COURT

for the

Northern District of California

In re: Loureda: DMCA Subpoena

Plaintiff

v.

Defendant

Civil Action No.

CV21

80062MISC

DMR

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Reddit, Inc.
1455 Market Street, Suite 1600
San Francisco, California 94103
(Name of person to whom this subpoena is directed)

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

Those documents and things described in Exhibit A hereto

Place: Fischer Law, P.L. 2 South Biscayne Blvd., Suite 2600 Miami, Florida 33131	Date and Time:
--	----------------

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
--------	----------------

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.

Date: _____

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Valerie Loureda, who issues or requests this subpoena, are:
Jason A. Fischer; 2 South Biscayne Blvd., Suite 2600; Miami, Florida 33131; jason@fischerlawpl.com; 305-306-3995

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, 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).

Civil Action No. _____

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

I received this subpoena for *(name of individual and title, if any)* _____
 on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

 _____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____
 _____.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
 tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
 \$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DMR

In re Loureda:

DMCA Subpoena Commanding
Production by Reddit, Inc.

CV 21-80062-MISO Case No.

EXHIBIT A

to Subpoena Commanding Production by Reddit, Inc.

Items and information requested pursuant to this subpoena are any and all information in your possession pertaining to the identity of the individuals who posted the images and content previously appearing at the following URLs:

https://www.reddit.com/r/VaLoureda/comments/m8zqey/_/
<https://preview.redd.it/nmng69pt44o61.jpg?width=960&crop=smart&auto=webp&s=30e5546acdf2a1ebb1fc88dfc20ded1b9b034f10>
<https://preview.redd.it/by3yn9pt44o61.jpg?width=960&crop=smart&auto=webp&s=21363b0d4b8b2c8d0975413b06982e82e36ab7d0>
<https://preview.redd.it/875f99pt44o61.jpg?width=960&crop=smart&auto=webp&s=22ebbf94c2abdd1df5e8c00c685935540076654e>
<https://preview.redd.it/fkqdv8pt44o61.jpg?width=960&crop=smart&auto=webp&s=8d7ee77963185d7b22d7861d4f4825a0b3943121>
<https://preview.redd.it/5kvvh8pt44o61.jpg?width=960&crop=smart&auto=webp&s=f45832734e8cac542d13f8e80010c31944394e19>
https://www.reddit.com/r/VaLoureda/comments/m7f0jy/_/
https://www.reddit.com/r/VaLoureda/comments/m7euhr/_/
<https://preview.redd.it/lgrq538dcon61.jpg?width=373&auto=webp&s=0de761f554f57d1a3837800c1bd88282f50988e1>
https://www.reddit.com/r/VaLoureda/comments/m7dvbv/_/
https://www.reddit.com/r/VaLoureda/comments/m7eei5/low_quality_but_tryna_contribute/
https://cdn.discordapp.com/attachments/819287105875869697/821841416200257546/RPReplay_Final1615859386.mp4
<https://cdn.discordapp.com/attachments/819287105875869697/819287155015811172/video0.mp4>
https://www.reddit.com/r/VaLoureda/comments/m7d7hr/_/
<https://preview.redd.it/jrwsuhqvyn61.jpg?width=750&auto=webp&s=712758283d7d2e696281d8880b49099a731b1511>
https://www.reddit.com/r/VaLoureda/comments/m6w1k6/_/

<https://preview.redd.it/bb62b36x0jn61.jpg?width=585&auto=webp&s=0a53e8960779bc451b86f8ce9b56a99a44bb80d2>
https://www.reddit.com/r/VaLoureda/comments/m6tcxw/better_crop_for_this_pic/
<https://preview.redd.it/fpqcwejtwen61.jpg?width=320&crop=smart&auto=webp&s=fdea46780e13d3dd4f6419fb2b997f37a83f9089>
<https://preview.redd.it/xj7xcmktwen61.jpg?width=320&crop=smart&auto=webp&s=eeca872d3f83b38be9a46300778d5e1cc742d40d>
https://www.reddit.com/r/VaLoureda/comments/m6c7m8/_/
<https://preview.redd.it/yh7rx6l7mbn61.jpg?width=354&auto=webp&s=8801f6ffe7c730e3ea2d4cc33cb7114c9e542d4c>
https://www.reddit.com/r/VaLoureda/comments/m61abv/_/
<https://preview.redd.it/56z5y8qw0sm61.jpg?width=576&auto=webp&s=93051aa62cfe8eb209a760dad6444e71e268e0a5>
https://www.reddit.com/r/VaLoureda/comments/m443m5/dm_preview_for_one_coming_later_today/
<https://preview.redd.it/s8hl41kyntm61.jpg?width=320&crop=smart&auto=webp&s=8eafc48243a3c0d2d2bac9641fe57fed40ebd879>
<https://preview.redd.it/4vnua1kyntm61.jpg?width=320&crop=smart&auto=webp&s=9fe3a2f7ae4db810766595669e342ac65f1bb371>
<https://preview.redd.it/0iifd0kyntm61.jpg?width=320&crop=smart&auto=webp&s=6e8297a7de4f6873fe9e529a391bad3dccdd9bf7>
https://www.reddit.com/r/VaLoureda/comments/m49nlq/ass_for_days/
<https://preview.redd.it/6q8jwxw548m61.jpg?width=354&auto=webp&s=3a33338a0f506d6806267e54fd2b64a8a5aa966b>
https://www.reddit.com/r/VaLoureda/comments/m20qem/_/
<https://preview.redd.it/norimbmw2m61.jpg?width=354&auto=webp&s=c5b96b222eacad6e4f5b8d43fb008b79a7c5aaef>
https://www.reddit.com/r/VaLoureda/comments/m1htl0/_/
<https://preview.redd.it/cvgxisigavl61.jpg?width=576&auto=webp&s=455683b1b2122796461a6b60466f6a726bd04f78>
https://www.reddit.com/r/VaLoureda/comments/m0prb2/dm_from_today/
<https://i.redd.it/nchp2viinlo61.jpg>
<https://i.redd.it/du8wpkfnlo61.jpg>
<https://i.redd.it/6k4izz26nlo61.png>
https://www.reddit.com/r/LRDA/comments/maqq46/titty_play/
https://www.reddit.com/r/LRDA/comments/maqfq7/that_smother_doe/
https://www.reddit.com/r/LRDA/comments/maqfif/yellow_thong/
https://www.reddit.com/r/LRDA/comments/maqf5w/lets_hope_this_sub_s_tays/

The information requested herein includes but is not limited to:

1. The individuals' usernames/account names;
2. The individuals' actual names;

3. The individuals' addresses;
 4. The individuals' phone numbers;
 5. The individuals' email addresses;
 6. The individuals' IP addresses (including dates and times of access);
- and
7. Billing information for the individuals' accounts.

Court Name: U.S. District Court, NDCA
Division: 3
Receipt Number: 34611153550
Cashier ID: sprinka
Transaction Date: 03/23/2021
Payer Name: bryn law group

MISCELLANEOUS PAPERS

For: Reddio Inc
Case/Party: D-CAN-4-21-MC-000062-001
Amount: \$49.00

PAPER CHECK CONVERSION

Check/Money Order Num: 3201
Amt Tendered: \$49.00

Total Due: \$49.00
Total Tendered: \$49.00
Change Amt: \$0.00

dmr

Checks and drafts are accepted
subject to collections and full
credit will only be given when the
check or draft has been accepted by
the financial institution on which
it was drawn.



Extremely Urgent

SHIP DATE: 22MAR21
ACTWTG: 0.10 LB
CAD: 2091584/NET4340

BILL SENDER

(305) 374-0501

ORIGIN ID: MPBA
JASON A. FISCHER

2 SOUTH BISCAYNE BLVD.
SUITE 2680
MIAMI, FL 33131
UNITED STATES US

TO
CLERK OF DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
450 GOLDEN GATE AVENUE, 16TH FLOOR

SAN FRANCISCO CA 94102
REF: FANTIME

(415) 522-2000

DEPT:

INV:

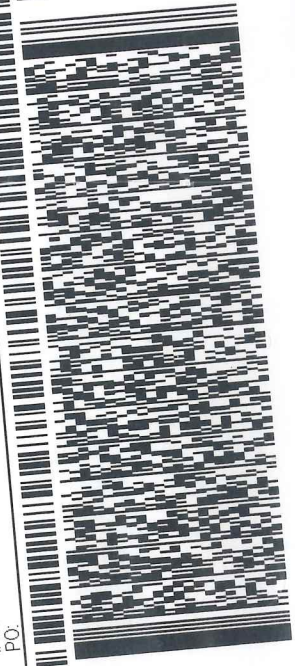
PO:



FedEx Express



J21121011501tw

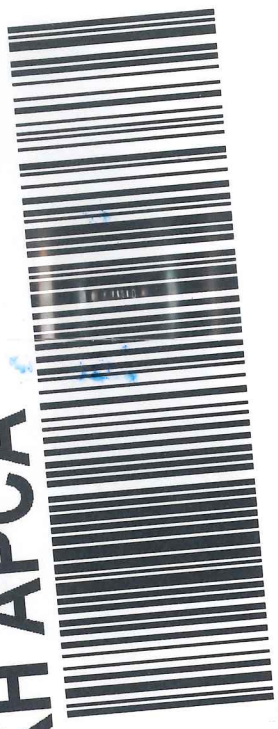


TUE - 23 MAR 10:30A
PRIORITY OVERNIGHT

TRK# 7732 2541 7504
0201

94102
SFO
CA-US

XH APCA



Insert shipping document here.

Align top of FedEx Express® shipping label here.



Envelope