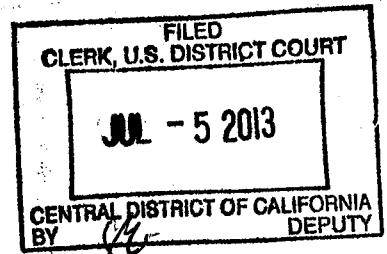


1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

John Steele  
1111 Lincoln Road, Suite 400  
Miami Beach, Florida 33139

*Pro Se*



*Amended*

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

**MOTION FOR RECONSIDERATION  
OF THE COURT'S JUNE 21 ORDER IN  
LIGHT OF PIETZ'S RECENT  
ADMISSIONS**

On June 21, 2013, the undersigned filed a motion asking the Court to hold attorneys Pietz and Ranallo accountable for their failure to serve their papers in this case. The Court summarily denied the motion. Since then, attorney Pietz has made damaging admissions that may cause the Court to reconsider its position. Specifically, Pietz admitted in an e-mail that he has not served any of the *pro se* persons in this case with any papers. (See June 23, 2013, e-mail from Morgan Pietz, attached hereto as Exhibit A.) Further, on or around June 27, 2013, the undersigned finally received copies of all of the papers that have been filed by Pietz in this matter. (See Steele Aff.)

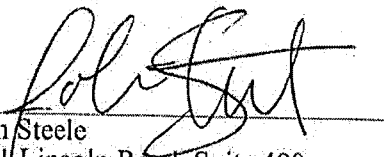
Now that there is no factual dispute regarding whether the *pro se* persons have been denied their Due Process right of notice and an opportunity to be heard, the undersigned hopes that the Court will take appropriate measures to correct this massive injustice by reconsidering its prior denial of the June 21, 2013, motion and by taking any other actions it believes are appropriate under the circumstances. The Court swore an oath to defend the Constitution, and this includes ensuring that litigants are afforded their due process rights. The record clearly establishes that attorneys Pietz

1 and Ranallo have fraudulently invoked the Court's coercive power by filing requests for relief  
2 without notifying the undersigned and others. The undersigned hopes that the Court will carefully  
3 consider the profound implications of this fraud on the due process rights of the *pro se* persons and  
4 reconsider its prior summary denial of the undersigned's request for relief.

5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DATED: June 28, 2013

Respectfully submitted,



John Steele  
1111 Lincoln Road, Suite 400  
Miami Beach, Florida 33139

*Pro Se*

**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 address is 1111 Lincoln Road, Suite 400, Miami Beach, FL 33139. I have caused service of:

**MOTION FOR RECONSIDERATION OF THE COURT'S JUNE 21 ORDER IN LIGHT OF PIETZ'S RECENT ADMISSIONS**

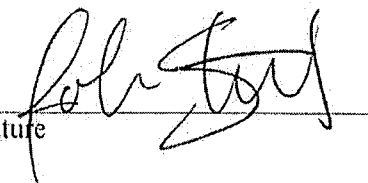
On the following parties via U.S. Mail first-class, postage prepaid:

<b>PARTIES</b>	<b>COUNSEL OF RECORD/PRO SE</b>
Prenda Law, Inc. 161 N.Clark St. Ste. 3200 Chicago, IL 60601	Klinedinst PC 501 West Broadway, Suite 600 San Diego, California 92101 Telephone: (619) 239-8131 Fax: (619) 238-8707 e-mail: hrosing@klinedinstlaw.com e-mail: dmajchrzak@klinedinstlaw.com
Ingenuity13, LLC Springates East Government Road Charlestown, Nevis	Pro Se
Livewire Holdings, LLC 2100 M Street Northwest, Suite 170-417 Washington, D.C. 20037	Pro Se
6881 Forensics, LLC Springates East Government Road Charlestown, Nevis	Pro Se

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

AF Holdings, LLC Springates East Government Road Charlestown, Nevis	Pro Se
Brett L. Gibbs 38 Miller Avenue, #263 Mill Valley, CA94941	Pro Se
Mark Lutz 2100 M Street Northwest, Suite 170-417 Washington, D.C. 20037	Pro Se
Paul Duffy 2 N. La Salle St. St., 13th Floor Chicago, IL 60602	Pro Se
Paul Hansmeier Alpha Law Firm, LLC 900 IDS Center 80 South 8 <sup>th</sup> St. Minneapolis, MN 55402	Pro Se
Peter Hansmeier 2100 M Street Northwest, Suite 170-417 Washington, D.C. 20037	Pro Se
Angela Van Den Hemel 2100 M Street Northwest, Suite 170-417 Washington, D.C. 20037	Pro Se
Non-Party Putative John Doe	Morgan Pietz (SBN 260629) The Pietz Law Firm 3770 Highland Ave., Ste. 206 Manhattan Beach, CA 90266 mpietz@pietzlawfirm.com Telephone: (310) 424-5557 Facsimile: (310)546-5301

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 28, 2013.

  
Signature

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

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

DECLARATION OF JOHN STEELE

I, John Steele, declare as follows:

- 1. Attached as Exhibit A hereto is a true and correct copy of an e-mail I received from Morgan E. Pietz on June 23, 2013.
- 2. On or around June 27, 2013, I received for the first time copies of documents that have been filed in this matter.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 28, 2013.

Signature 

# **Exhibit A**

1 message

Morgan E. Pietz <mpietz@pietzlawfirm.com>

Sun, Jun 23, 2013 at 5:50 PM

To: johnsteele@gmail.com

Cc: Nicholas Ranallo <nick@ranallolawoffice.com>, "Heather L. Rosing" <HRosing@klinedinstlaw.com>, Brett Gibbs <brett.gibbs@gmail.com>, Paul Hansmeier <phansmeier@thefirm.mn>, Prenda <paduffy@wefightpiracy.com>, "Philip W. Vineyard" <PVineyard@klinedinstlaw.com>, "Rudolph, Leslie" <lrudolph@pietzlawfirm.com>

Mr. Steele,

I am catching up on some work here today, and just saw your latest Friday motion, and the denial thereof that followed hard on its heels. Previously, all parties were registered for ECF and received copies of all pleadings that way. However, it does appear that since you and your colleagues went pro se, you are no longer getting ECF notices.

Had you alerted us to the problem, we'd have been happy to get that taken care of for you. I will let my assistant know to make sure to use your registered address for paper service copies going forward. Since fees for the service copies are likely to be taxed as part of the bond your team has posted, just let us know if you'd like us to serve you via this email, to save you the expense.

In fact, I might propose that to all the pro se Prenda parties appearing on this email chain who are not registered for ECF – for both the district court action, and the 8 appeals to the Ninth Circuit, shall we stipulate to email service? Please let me know.

Best regards,

Morgan

—  
Morgan E. Pietz  
THE PIETZ LAW FIRM  
3770 Highland Ave., Ste. 206  
Manhattan Beach, CA 90266  
mpietz@pietzlawfirm.com  
Ph: (310) 424-5557  
Fx: (310) 546-5301  
www.pietzlawfirm.com