

possess, use, control, and/or derive any income from; being such documents that refer, relate, pertain and/or are otherwise made applicable to any period of time, or part thereof, on or after January 1, 2004.

**RESPONSE: All responsive documents will be produced.**

## **INTERROGATORY #2**

IDENTIFY each internet or website, that YOU have owned (in whole or in part), operated, populated, controlled, licensed, distributed, franchised, provided content to, maintained, posted to, or participated in, during any period of time on or after January 1, 2004, as well as each Internet or website hyperlinked or linked to such site or sites.

**ANSWER: e360Insight.com is owned by e360Insight, LLC. e360data.com is also owned by e360Insight, LLC. Attached is a document containing the link to a group message board to which Dave Linhardt posted messages. No other relevant documents responsive to this request exist.**

**ANSWER: Objection. This interrogatory is vague and ambiguous, incapable of a narrative response, and seeks information that is not relevant to the subject matter of the pending action. Moreover, it is irrelevant to jurisdictional issues and will not be answered.**

**REQUEST FOR PRODUCTION #9**

Produce all documents that refer, relate, or pertain to any site map, html content, database, database content, data array, java script, and/or any other web page content/source code which related in whole or in part to the operation, maintenance, data mining, and/or data retention of any website identified in YOUR answer to Interrogatory #2, above.

**RESPONSE: Objection. This interrogatory is vague and ambiguous, incapable of a narrative response, and seeks information that is not relevant to the subject matter of the pending action. Moreover, it is irrelevant to jurisdictional issues and will not be answered. Without waiving said objections, attached is a software user manual that describes the process for maintaining source codes.**

**INTERROGATORY #6**

For each Internet or website identified in YOUR answer to Interrogatory #2, state the location including city and state, of the server for that site.

**ANSWER: Chicago, Illinois**

**INTERROGATORY #7**

IDENTIFY each email server and/or listserv, that YOU have owned (in whole or in part), operated, populated, controlled, licensed, distributed, franchised, provided content to, maintained, posted to, or participated in, during any period of time on or after January 1, 2004, as well as each Internet or website hyperlinked or linked to such site or sites.

**ANSWER: Objection. Defendants are unclear as to the meaning of "listserv" and therefore, are unable to provide a response as to that part of the Interrogatory. Without waiving such objection, Defendants distribute content to e360Insight.com and e360data.com.**

#### **REQUEST FOR PRODUCTION #10**

Produce all documents that refer, relate, or pertain to any emails, site map, html content, database, database content, database structure, data array, java script, and/or any other email content/source code which related in whole or in part to the operation, maintenance, and/or use of email server and/or listserv identified in YOUR answer to Interrogatory #7, above.

**RESPONSE:Objection. This request is vague and ambiguous and overly burdensome for Defendant to respond to. Stating further, no such documents exist. See Response to Interrogatory 7.**

#### **INTERROGATORY #8**

For each email server and/or listserv identified in YOUR answer to Interrogatory #7, state the location including city and state, of the server for that email server and/or listserv.

**ANSWER: N/A. See Response to Interrogatory 7.**








#### **INTERROGATORY #9**

For each email server and/or listserv identified in YOUR answer to Interrogatory #7, state the number of email communications that were sent, copied, and/or otherwise distributed to email addresses ending in 'columbus.rr.com', 'osu.edu', and/or 'oh.us' in each of the following calendar years: (a) 2004, (b) 2005, (c) 2006, and (d) 2007.

**ANSWER: N/A. See Response to Interrogatory 7. Stating further, Defendants do not track email communications by date. However, of the 120 million email addresses in Defendant E360Insight, LLC's database, 273 have an ending email address of osu.edu; 50 have an ending email address of Columbus.rr.com, and none have an ending email address of oh.us. This represents a total of .000027%.**

**news . admin . net-  
abuse . email****Discussions**View: [Topic list](#), [Topic summary](#)Topics 1 - 10 of 1099727 [Older »](#)

Description: Discussion of abuse of email systems.

-  [MEDIA: All hail Europe, the new "king of spam"](#)  
[\[link\]](#) of-spam.html or [\[link\]](#) Nutshell of it is blaming the increase in broadband across Europe. It is saying that Europe now accounts for 44% of spam, with North American now "down" to 35.1%  
 By [Marc Bissonnette](#) - 3:44pm - [2 new](#) of 2 messages
-  [How are messages that I didn't post being posted as if from me?](#)  
 How are messages that I didn't post being posted as if from me?  
 By [the zak](#) - 3:25am - [3 new](#) of 3 messages
-  [2008-02-06: US 39.0%, AS19262 \(US\) 7.5%, 204.13.64.0/21 \(US:AS33314\) 4.0%](#)  
 It is another \*presentation format\* with added per country and ASN summaries of data published at [\[link\]](#) \* ASN info: [asn.routeviews.org](#) [\[link\]](#) \* Country info: [zz.countries.nerd.dk](#) [\[link\]](#) Top 200 targets of spamcop.net spam reports... [more »](#)  
 By [Andrzej Adam Filip](#) - 3:24am - [1 new](#) of 1 message
-  [POINTER: ALL THESE NET-ABUSE GROUPS! WHICH ONE SHOULD I USE?](#)  
 Last-modified: 2003-10-04 (revision 1.14) Posted-by: postfaq 1.15 (Perl 5.8.8)  
 Archive-name: net-abuse-faq/newsgroups URL: [\[link\]](#) Original-author: Fluffy <gergl...@usa.net> Posting-frequency: weekly We have a plentiful selection of newsgroups about network abuse and... [more »](#)  
 By [Russ Allbery](#) - 3:00am - [1 new](#) of 1 message
-  [What parts of Jamaica Plain or streets in Jamaica Plain are outside the 8th Congressional District?](#)  
 informers who were being rewarded by Government for their extortion. Imagine the terror that respectable Chinese women suffered, knowing that any man might denounce them, out of malice, and thereby reduce them to the very worst conceivable form of slavery! Within a few years, nearly all the respectable Chinese women had disappeared from... [more »](#)  
 By [the zak](#) - Feb 5 - [1 new](#) of 1 message
-  [City Council stenographic machine output and transcribed debate and remarks at public meetings of our Boston City Council.](#)  
 a sum of money, required to rescue the family, or some member of it, from some great calamity or permanent ruin." "There is, however, one class of women in Hong Kong who can scarcely be called prostitutes, and who have no parallel either in China, outside the Treaty Ports, or in Europe. They are generally... [more »](#)  
 By [the zak](#) - Feb 5 - [1 new](#) of 1 message
-  [RTe 16 bridge over Rte 9 in Wellesley Hills](#)

[About this group](#)[Subscribe to this group](#)This is a Usenet group - [learn more](#)[Find or start](#) a Google Group about [email](#).[Active older topics](#)[e360insight.com - OWNED,](#)  
[51 new](#) of 51 - Jan 31[What happened at Verizon?](#)  
[50 new](#) of 50 - Feb 3[e360Insight, LLC. v Comcast Co](#)  
[141 new](#) of 142 - Jan 24[what ever happened to dennis p](#)  
[4 new](#) of 4 - Jan 8[from comcast end user.](#)  
[8 new](#) of 8 - Feb 4[Why do christians like P M kevir](#)  
[11 new](#) of 11 - Feb 5[Question About Paul Prudhomr](#)  
[11 new](#) of 11 - Feb 5[Girl Caught on Toilet - A6HuBH](#)  
[13 new](#) of 13 - Feb 5[Young Teen Nude - FX6mhIVFC](#)  
[20 new](#) of 20 - Feb 5[free trial risky voyeur uSTN5.jpg](#)  
[17 new](#) of 17 - Feb 5[Word97 Print Problem](#)  
[5 new](#) of 5 - Feb 5[Live Projects](#)  
[13 new](#) of 13 - Feb 5[Space before question mark](#)  
[2 new](#) of 2 - Feb 5[Printing Word document from .n](#)  
[9 new](#) of 9 - Feb 5[A REAL STIMULUS PLAN](#)  
[35 new](#) of 35 - Feb 5[Best Upgrade?](#)  
[2 new](#) of 2 - Feb 5[Related Groups](#)[news.admin.net-...ocklisting](#)  
Discussion of ip-based  
blocklisting. (Moderated)  
Low activity, Usenet[news.admin.net-...sightings](#)  
Sightings of net abuse

throbbing between hope and fear, but was reassured when a slender hand slipped into hers and a sweet, encouraging voice whispered: "I have faith to believe God will give us the girl." Faith triumphed that day. Through two of Chinatown's most desolate old tenements, upstairs and downstairs... [more »](#)

By [\\_Michael](#) - Feb 5 - [4 new](#) of 4 messages

### ☆ [Waltham, Weston Mull Over Rail Trail](#)

is permitted as exceptions to the penalties inflicted by Chinese law in China proper, these conditions do not exist in Hong Kong; and that the conditions necessary to these exceptions in their favor in the Chinese Criminal Code do not exist in Hong Kong, and that the penalties would apply, if in China, to all such... [more »](#)

By [John S](#) - Feb 5 - [1 new](#) of 1 message

### ☆ [Fighter jets overhead?](#)

servants), and then proceeding to compel them by force to become prostitutes, or exporting them to a foreign port, or distribute them by sale over the different ports of China, boys being sold to become adopted children, girls being sold to be trained for prostitution." "Your petitioners are of opinion... [more »](#)

By [Cheryl Isaak](#) - Feb 5 - [5 new](#) of 5 messages

### ☆ [Free today. Napoleon exhibition. Museum of Fine Arts. Boston.](#)

Ha's new slave girl!" We would be glad to end the story of our little friend's troubles and safe escape with her arrival at last in the Mission Home that day. But how few rescues ever do end in that peaceful and pleasant way! There followed the usual train of lawyers and warrants. To avoid... [more »](#)

By [the zak](#) - Feb 5 - [1 new](#) of 1 message

[+ New post](#)

1 - 10 of 1099727 [« Newer](#) | [Older »](#)

[XML](#)

[Create a group](#) - [Google Groups](#) - [Google Home](#) - [Terms of Service](#) - [Privacy Policy](#)

©2008 Google

Sightings of net abuse.

(Moderated)

High activity, Usenet

[alt.spam](#)

What is that stuff that doth

jiggle in the breeze?

Low activity, Usenet

[More related groups »](#)

Sponsored Links

[Construction in Canada](#)

Commercial Real Estate Development,

Construction or Project Management.

[www.coopercon.com](#)

[Viewit.ca](#)

Virtual tours of thousands of

apartments for rent in Canada

[www.Viewit.ca](#)

[Cheap Resort in Krabi](#)

Nice choice for your holidays

surrounded by relaxing atmosphere

[www.sundaresort.com](#)

[See your message here...](#)

Related Pages

[ZIP code and Canadian postal code](#)

data file with city, state or ...

Canadian postal code data file with city

name, province code, area ...

[www.zipinfo.com](#)

[Area Codes in the Yahoo! Directory](#)

Search sites for information on U.S.

area codes and international ...

[dir.yahoo.com](#)

[Mapland Mapping Software - Microsoft](#)

[Excel Add-In Map Program](#)

Mapland is mapping software that

works inside Microsoft Excel. ...

[www.softill.com](#)

E360 - 02

**CERTIFICATION**

STATE OF ILLINOIS            )  
  )  
  )        SS:  
COUNTY OF COOK            )

I, David Linhardt, hereby certify that to the best of my own personal knowledge the foregoing answers and responses are true, correct and complete and that I am authorized to provide these answers and responses on behalf of Defendant E360Insight, LLC, as well as myself.

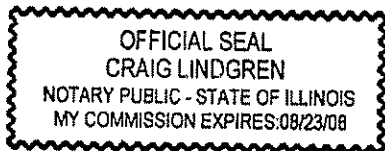
*[Handwritten Signature]*

Signature

*PRESIDENT*

Title (as agent for E360INSIGHT, LLC)

Sworn to and subscribed in my presence this 7<sup>th</sup> day of February, 2008.



*[Handwritten Signature]*

Notary Public