

EXHIBIT A TO DEFENDANTS' MOTION FOR LEAVE TO FILE SUR-REPLY

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF OHIO, EASTERN DISTRICT

DAVID ALLISON DBA CHEAT CODE
CENTRAL,

Plaintiff,

v.

JEREMY N. WISE, and
WISE BUY NOW, LLC

Defendants.

Case No. 2:08-cv-00157

Judge Watson

Magistrate Judge Abel

DEFENDANTS' SUR-REPLY

Defendants Jeremy N. Wise and Wise Buy Now, LLC, ("Defendants"), by and through their counsel of record, file this Sur-reply to Plaintiff's Reply to Defendants' Response to Plaintiff's Motion for Sanctions (Doc. #49) ("Reply").

1. Plaintiff routinely appropriates third-party content for his site.

Defendants have identified several witnesses which it believes to be the genuine authors of several of the cheat codes of which Plaintiff claims authorship. See Affidavit of Charles Lee Mudd, Jr. ("Mudd Aff.") at ¶¶ 17-24.¹ These cheat codes originally appeared on www.gamewinners.com and were attributed to these authors. Mudd Aff. at 17. Plaintiff argues in his Reply that the witnesses should be excluded, partially because Defendant has "no evidence that Plaintiff had sufficient knowledge" of the existence of these witnesses. Reply at 10. Plaintiff's argument is carefully crafted. Plaintiff never states that he was unaware of their existence. He never denies that he copied codes authored by these individuals from

¹ Defendants' Response, Exhibit A.

www.gamewinners.com. He never addresses that the codes identified by him as infringing originated at www.gamewinners.com. Plaintiff's alleged lack of knowledge is completely unsupported by his testimony, or any citations to the record. See Reply at 10. If he indeed did not copy cheat codes from these individuals, why does he not testify to that effect?

In fact, to the contrary, Defendants have found recent occurrences of cheat codes being posted to www.gamewinners.com and their subsequent appearance, in a nearly identical (if not identical) form on Plaintiff Allison's site. See Supplemental Affidavit of Charles Lee Mudd, Jr. ("Suppl. Mudd Aff.") at ¶¶ 9-13 (attached hereto as "Exhibit A"). Defendants obtained captures for webpages from www.gamewinners.com and Plaintiff's site, www.cheatcc.com. Among those captured, the Defendants saved webpages containing cheat codes for three specific games for which documents have been attached hereto: Blazblue: Calamity Trigger; Dynasty Warriors 6: Empires; and Overlord 2.² Suppl. Mudd Aff. at Exhibit 1. The documents saved include (1) a PDF of a webpage containing cheat codes from www.gamewinners.com; (2) a PDF of a webpage containing cheat codes from www.cheatcc.com of the same day, absent some cheats from www.gamewinners.com; and (3) a PDF of a webpage of the same URL from www.cheatcc.com on a subsequent date showing added content nearly identical (if not identical) to the first PDF of www.gamewinners.com. Id. For Overlord 2, several PDFs of this nature have been produced. With respect to each of these three games, the documents attached show a clear pattern of copying by Plaintiff from www.gamewinners.com.³ Id., pp. 26-56.

² Additional examples can be produced.

³ Many of the documents attached in Exhibit 1 to the Affidavit of Charles Lee Mudd, Jr. were identified in disclosures during fact discovery. The documents saved on dates subsequent to the close of fact discovery are produced here to dispute the claims and allegations of Plaintiff in his Reply.

As a specific example of Plaintiff's copying, the documents for Overlord 2 show that, on July 9, 2009, www.gamewinners.com exhibits a cheat entitled "Finding more people" and www.cheatcc.com does not. *Id.*, pp. 35-39. However, www.cheatcc.com does later exhibit this same cheat on August 6, 2009. *Id.*, pp. 44-46. Moreover, with respect to the Overlord 2 cheats, Defendants have obtained testimony that one of the specific cheats found on both sites was authored by Matthew Clark, not Plaintiff. Affidavit of Matthew Clark ¶¶ 3-9 (attached as hereto as "Exhibit B").

The instances uncovered by the Defendants thus far, and certainly those related to the disputed invalidity witnesses, are likely the tip of the iceberg. The authorship and source of Plaintiff's cheat codes have always been the subject of discovery; Defendants have several requests directed to this matter. Despite Plaintiff's obvious verbatim copying, he has never disclosed www.gamewinners.com in discovery and denies, without prompting, copying from third-parties, claiming he is the sole author of all of his content. *See* Defendant's Response, Ex. F at Interrogatory Nos. 3, 6, 7, and 13. Defendants should not be sanctioned for having independently discovered information that Plaintiff had the duty to disclose in his discovery responses. Plaintiff's complete lack of acknowledgement of his discovery duties with regard to this information, his insistence that Defendant had some sort of duty to discover this information sooner, and filing of a sanctions motion to exclude witnesses related to this information is inexcusable and, as indicated in Defendant's response, is itself an offense subject to sanctions. *See* Response at 15-16.

Plaintiff's arguments regarding his alleged lack of knowledge of these putative authors raises no grounds for sanctions. Plaintiff had knowledge that he did not author his allegedly copyrighted content and withheld this information during discovery. Any alleged delay was due

to Plaintiff's own actions; Plaintiff's motion to exclude these witnesses should be denied on this basis. See Southern States Rack & Fixture, Inc. v. Sherwin-Williams Co., 318 F.3d 592, 597 (4th Cir. 2003) (citing *the disclosing party's explanation for its failure to disclose evidence and surprise to the non-disclosing party* among the factors used in determining whether a delay in disclosure is substantially justified or harmless); see also Response at 12.

2. The nature of the witnesses makes their testimony no less relevant; it is not ground for exclusion.

Plaintiff for the first time raises in his reply the difficulty in deposing the witnesses as grounds for sanctions in the form of exclusion. The Plaintiff mentions that there is little available contact information for these witnesses; that many are not cooperating in divulging information; that the two affiants are teenagers; and that several reside out of the country.⁴

These factors are not within the control of Defendants and are obstacles that the Defendants have also had to deal with in attempting to gain information. Mudd Aff. ¶¶ 20 and 24; Suppl. Mudd Aff. ¶ 6. Further, the addresses and telephone numbers for these witnesses is required to be disclosed only "if known." See Fed. R. Civ. P. 26(a)(1)(A)(i). Defendants provided all known contact information for these witnesses at the time of disclosure; Defendants complied with the rules and should not be sanctioned for the lack of information. Suppl. Mudd Aff. ¶ 7.

Defendants have had identical problems when trying to contact the witnesses. Mudd Aff. ¶¶ 20 and 24; Suppl. Mudd Aff. ¶ 6. However, bringing them before the Court would not be as impossible as Plaintiff makes out. Information regarding these witnesses can be subpoenaed

⁴ Contrary to Plaintiff's suggestion, Defendants have not purposefully chosen witnesses who reside outside the Court's jurisdiction. See Reply at 11. The witnesses were identified in relation to cheats produced by the Plaintiff – Defendants did not choose the cheats or the witnesses. The location of these witnesses has always been outside of Defendants' control.

and, for witnesses outside of the Court's jurisdiction, they can be subpoenaed to appear for deposition in their own jurisdiction. This is also true for foreign witnesses as they can be deposed or sent written discovery through the Hague Convention. Defendant will gladly cooperate and share equally any burden in taking such third-party discovery.

That being said, the nature and difficulty in contacting these witnesses makes the information they possess no less relevant or important to the case at hand. In fact, to the contrary, any difficulty or lack of information is substantially justified. See, e.g., Hunter v. Buckle, Inc., 488 F. Supp. 2d 1157, 1163 (D. Kan. 2007) (Holding disclosing party's delay substantially justified where witness had been hard to reach and disclosing party had lacked sufficient contact information for the witness.).

Further, the information in the possession of these witnesses, information regarding the authorship of several of the cheat codes of which Plaintiff contends he is the sole author, goes to the very heart of this matter, the ownership of a valid copyright. That only two statements have been taken and only these putative cheat code authors have been found does not make this evidence insignificant.

Plaintiff seems to suggest that the presumption of validity given to registered copyrights somehow makes the testimony of these authors moot. See Reply at 11-12. However, a Defendant has the right to challenge this presumption.⁵ Plaintiff cites absolutely no authority

⁵ See Notes to 17 U.S.C. §410(c):

[E]ndowing a copyright claimant who has obtained a certificate with a rebuttable presumption of the validity of the copyright does not deprive the defendant in an infringement suit of any rights; it merely orders the burdens of proof. The plaintiff should not ordinarily be forced in the first instance to prove all of the multitude of facts that underline the validity of the copyright unless the defendant, by effectively challenging them, shifts the burden of doing so to the plaintiff.

which suggests that testimony from witnesses purporting to be the true creators and authors of a work would not constitute evidence which would shift the burden with respect to validity. In fact, “[t]o rebut the presumption... a defendant sued for infringement must simply offer some evidence or proof to dispute or deny the plaintiff’s prima facie case of infringement.” Palladium Music, Inc. v. EatSleepMusic, Inc., 398 F.3d 1193, 1196 (10th Cir. Okla. 2005) (quotations omitted).

The evidence gathered thus far from these witnesses indicates that Plaintiff is not the author or owner of a valid copyright in his allegedly copyrighted website. Whether it is substantial enough to show invalidity is a question for the finder of fact. Medforms, Inc. v. Healthcare Mgmt. Solutions, Inc., 290 F.3d 98, 110 (2d Cir. N.Y. 2002) (“Authorship is generally a question of fact for the jury.”). Again notable is the fact that Plaintiff has yet to deny that he copied codes from third-parties and placed them on his site and in his allegedly copyrighted works. Plaintiff routinely copies codes from www.gamewinners.com, the source of the codes authored by the disputed witnesses. Suppl. Mudd Aff. ¶¶ 9-13, Ex. 1. Contrary to Plaintiff’s arguments, Defendants have substantial evidence showing Plaintiff’s lack of authorship.

Plaintiff’s arguments regarding the nature and location of these witnesses raise no grounds for sanctions. Plaintiff has failed to diminish the relevance of the information possessed by these witnesses. The need for these witnesses and the relevance of the information in their possession far outweigh any alleged prejudice to the Plaintiff. See Southern States Rack, 318 F.3d at 597 (4th Cir. 2003) (citing *the importance of the evidence*, and *the disclosing party’s explanation for its failure to disclose evidence* among the factors used in determining whether a

delay in disclosure is substantially justified or harmless); see Roberts v. Galen of Va., Inc., 325 F.3d 776, 782 (6th Cir. 2003) (stating that Rule 37(c)(1) "mandates that a trial court punish a party for discovery violations in connection with Rule 26 unless the violation was harmless or is substantially justified.") (citations omitted, emphasis added). . Plaintiff's motion to exclude these witnesses should be denied.

3. Plaintiff is not the sole author of the alleged infringed work.

Plaintiff attempts to minimize the impact of the two disclosed witness affidavits by stating that it only implicates ".004 percent" of his allegedly copyrighted work.⁶ See Reply at 2, 8, and 10. However, these affidavits account for the true authorship of two cheat codes within the twelve examples that were disclosed as Plaintiff's infringement contentions. Response at 6-7; Response Exhibit D. Since the close of fact discovery, Defendant has obtained additional signed statements from an affiants testifying that they authored cheat codes Plaintiff alleges to have authored. Affidavit of Cameron Benoit (attached hereto as "Exhibit C"); Affidavit of Shayne Colton (attached hereto as "Exhibit D")⁷. Further, though not all have agreed to provide written statements, Defendant has received responses from additional witnesses purporting to have authored other cheats within the twelve examples of allegedly infringed content disclosed by the Plaintiff. These witnesses should not be peremptorily excluded; the weight that should be

⁶ Plaintiff states that the two witness statements relate to .004 percent of his 12,000 allegedly copyrighted cheat codes, but what percentage of those cheat codes does he allege to be infringed? What percentage did Plaintiff actually author and what percentage did he copy from third-party sites such as www.gamewinners.com? These are questions that have to be answered before Defendants are able to complete an investigation and build their rebuttal and invalidity cases. To this date Plaintiff has given twelve examples of infringement out of 12,000 possible cheat codes, .1 percent of his allegedly copyrighted cheat codes, all of which were actually authored by third-parties.

⁷ Please note that the date on this affidavit is incorrect; it was actually signed on August 9, 2009. Defendants are working to get a corrected affidavit with a proper notarization. This is indicative of the types of difficulties Defendants have had reaching and obtaining information from these witnesses.

given evidence regarding authorship and validity should be decided by a jury rather than in a motion to exclude. Medforms, Inc., 290 F.3d at 110.

Plaintiff misleads the Court stating that the witness statements represent the only evidence of invalidity against him. See Reply at 8. Plaintiff fails to mention evidence produced by Defendants during discovery regarding numerous persons complaining of Plaintiff copying strategy guides without permission. See Defendant Jeremy Wise's Amended Response to Plaintiff's First Set of Interrogatories, No. 17 (attached hereto as "Exhibit E"). This evidence was produced in response to discovery requests related to Defendant's affirmative defenses and though it does not involve the cheat codes that Defendants are accused of infringing, it is further evidence that Plaintiff is not the author of and does not own the copyright in the alleged infringed works. Moreover, the Plaintiff fails to mention the webpages previously identified that contain cheat codes on www.gamewinners.com the authorship of which is attributed to parties other than the Plaintiff.

Plaintiff then argues that Defendant lacked diligence in his search, that he had copies of the works at issue for months before conducting the limited search in July 2009. Plaintiff argues that Defendants could have found this information earlier, as it took "only an Internet search" to find it. See Reply at 8. However, prior to Plaintiff's disclosure of the twelve examples of allegedly infringed cheat codes and indicated that it intended to produce no more specific examples, Defendant would have had to conduct this Internet search on twelve-thousand cheat codes (guessing at what Plaintiff alleged Defendants infringed), rather than twelve examples.

The newly discovered witnesses and information related to www.gamewinners.com were not discovered for lack of diligence. They were discovered precisely because on June 22, 2009, Plaintiff's counsel limited its infringement contentions to the twelve examples. Mudd Aff. ¶ 8.

Despite the ongoing investigation regarding Defendants' rebuttal damages case, Defendants' would never have found the invalidity evidence on www.gamewinners.com without the infringement examples being limited from thousands and thousands of pages to the twelve.

Further, once Defendants learned of the possibility that Plaintiff was not the true author of his allegedly copyrighted works, Defendants immediately began to search for and gather all relevant information related to these witnesses and disclose it to Plaintiff in a timely manner. Mudd Aff. ¶¶ 16-31. Defendants should not be sanctioned for their efforts in gaining all information possible related to the authorship of Plaintiff's allegedly copyrighted works - especially considering that Plaintiff has withheld the fact that many of his codes originated from third-parties and that he habitually copied from www.gamewinners.com for a number of years.

Despite their best efforts, Defendants remain kept in the dark regarding Plaintiff's infringement contentions. Having represented to the Court and to Defendants in the June 22, 2009, that Plaintiff intends to rely solely on the twelve examples of infringement produced in discovery, Plaintiff now makes the contradictory statement that it will make a substantial similarity analysis by comparing the two works (which consist of tens of thousands of cheat codes) in their entirety. See Reply at 6-7; see also Mudd Aff. ¶ 8. In doing so, Plaintiff states that Defendants copied "substantial portions" of his 12,000 cheat codes. See Reply at 1. However, these "substantial portions" have never been identified beyond the twelve examples disclosed in March 2009. Mudd Aff. ¶¶ 6-8; Suppl. Mudd Aff. ¶ 8.

Plaintiff further states "a substantial similarity analysis arising from the evidence twice produced through discovery in this matter will demonstrate that large portions of the two works are virtually identical." See Reply at 7. Despite incessant prodding by Defense counsel and numerous discovery requests directed to this issue, Plaintiff has yet to disclose a "substantial

similarity analysis” for its infringement contentions. According to Plaintiff “[n]o expert will be required to demonstrate the substantial similarity here. It is obvious to even the most casual observer.” See Reply at 8. If it is that obvious, then why has Plaintiff been unable to produce any example of infringement beyond the twelve examples produced in fact discovery? Further, who is going to testify regarding this analysis? How is it going to be presented at trial? By Plaintiff’s account, producing information regarding this analysis would be unduly burdensome. See, e.g., Defendant’s Response, Ex. F at Interrogatory No. 4; see also Plaintiff’s Response to Defendant’s Amended First Request for Production of Documents at No. 5 (attached hereto as “Exhibit F”). However, if it can be presented in testimony, it can be disclosed in fact discovery and yet it has not. Merely producing entire copies of the works at issue does not constitute disclosure of Plaintiff’s infringement analysis. Certainly, if Plaintiff is going to conduct a substantial similarity analysis at trial, this should have been disclosed during discovery and should be barred at this juncture.⁸

Defendant has never been accused of wholesale copying of the Plaintiff’s website, but of taking discreet sections of cheat codes. Mudd Aff. ¶ 8; see also Response Ex. C (twelve

⁸ Plaintiff has made the unsupported conclusion that Defendant itself should have compared the two works (which each consist of tens of thousands of cheat codes), and thereby anticipate Plaintiff’s infringement contentions. See Reply at 6-7. However, it is Plaintiff’s burden to prove infringement, it is not Defendant’s burden to anticipate Plaintiff’s infringement contentions. Feist Pub’ns, Inc. v. Rural Tel. Serv. Co., 499 U.S. 340, 361 (1991). As stated in his Response, Mr. Wise will move to exclude any additional allegations of infringement as they were never disclosed during discovery. See Roberts v. Galen of Va., Inc., 325 F.3d 776, 782 (6th Cir. 2003); Cummins-Allison Corp. v. SBM Co., Ltd., 2009 U.S. Dist. LEXIS 22114 (E.D. Tex. Mar. 19, 2009) (citing Roberts and excluding invalidity contentions in a patent infringement case where contentions were not disclosed in accordance with the local patent rules); Computer Acceleration Corp. v. Microsoft Corp., 503 F. Supp. 2d 819, 825 (E.D. Tex. 2007) (citing Roberts and striking infringement contentions stating “Allowing such a scanty and inadequate infringement contention disclosure to stand would deter neither game-playing nor actual violation of the rules - to the contrary it would actually discourage the voluntary exchange of information.”)

examples produced by Plaintiff). Plaintiff is now waffling on his intention to rely on the twelve examples and is making the unsupported statement that Defendant copied “substantial portions” of his website. If Plaintiff intends to make some sort of selection and arrangement argument or now alleges infringement of a compilation rather than discreet codes, such changes in tactic would certainly constitute trial by ambush as Plaintiff has always maintained a position that Defendant copied verbatim codes without any mention of selection and arrangement. *Mudd Aff.* ¶ 8; see, e.g., Feist Publ'ns, Inc. v. Rural Tel. Serv. Co., 499 U.S. 340, 358 (U.S. 1991) (contemplating a compilation entitled to copyright protection if it involves an original selection and arrangement of pre-existing materials).

In his Reply, Plaintiff also misleads the Court by stating that Defendants’ conceded infringement of large portions of Plaintiff’s website by removing much of the accused website after receiving a cease and desist letter in 2007. Reply at 6; *Allison Aff.* ¶ 5. However, Defendants never received a cease and desist letter before the initial suit was filed. See Affidavit of Jeremy Wise (“Wise Aff.”) ¶ 4 (attached hereto as “Exhibit G”). Instead, Mr. Wise received a notice that he had been sued via email. *Id.* ¶ 5. At the time of receiving the notice, the Defendants' website contained tens of thousands of cheat codes that had been obtained by Defendants through the purchase of websites, their own diligent work, and other resources. *Id.* ¶ 7. Much of the Defendants’ database of cheats existed prior to late 2006, the time during which Defendants are alleged to have infringed Plaintiff’s cheats. *Id.* ¶ 6. Indeed, Mr. Wise had been compiling his database for over six years, adding to an already substantial database he purchased in 2000. *Wise Aff.* ¶ 8. The database he purchased had been compiled starting in 1994, three years prior to Plaintiff’s efforts which began in 1997. *Id.* Indeed, much of the Defendants’ website existed prior to any alleged infringement. *Wise Aff.* ¶ 9. Upon receiving notice that he

had been sued, Mr. Wise removed all cheat code content obtained since October 2006 in a good faith effort to investigate the matter and in the hope that it would remove any allegedly infringing content. Wise Aff. ¶ 10. As the Plaintiff had not identified any specific cheats, the Defendants engaged in an effort to change language on many cheats, which in their essence represent factual statements, to avoid any issues of alleged infringement.⁹ The removal of the cheats by Mr. Wise proves only his diligence in trying to resolve the matter without further court interventions; it proves nothing regarding infringement.

Plaintiff attempts to distinguish this case from Hines v. Dean by stating that here, the Defendants' copied, verbatim, significant portions of his work. Reply at 7-8. However, Plaintiff cites absolutely no evidence to show such copying, and has disclosed no evidence related to a substantial similarity analysis. Defendants are even more in the dark about Plaintiff's infringement contentions than the defendant in Hines, as Plaintiff is continuing to change and withhold his contentions. Any alleged delay on Defendants' part is excusable, harmless and substantially justified. See, e.g., Hines v. Dean, 2005 U.S. Dist. LEXIS 44792 (N.D. Ga. Mar. 10, 2005) (refusing to exclude defendant's expert report where it "could not have been prepared earlier because plaintiff failed to timely disclose his infringement contentions, waiting until just three weeks before liability discovery closed to provide defendants this crucial information.").

Any alleged delay in the discovery and disclosure of the disputed invalidity witnesses is due to Plaintiff's dilatory discovery tactics in withholding his infringement contentions and withholding information regarding third-party sources of his cheat codes. In fact, Plaintiff

⁹ Defendant Wise goes into great detail in his responses to discovery to describe the process he went through in removing content from his site after receiving notice of the law suit. These responses are subject to the Protective Order and can be produced under seal if necessary. Plaintiff is fully aware of Defendant Wise's actions in this regard and fails to advise the Court accordingly in its Reply.

continues to withhold its elusive infringement contentions, preventing Defendants from completing their investigation and mounting a defense. Any alleged delay was substantially justified and harmless; Plaintiff's motion to exclude these witnesses on the grounds that Defendants lacked diligence in their investigation should be denied. See Fed. R. Civ. Proc. 37(c)(1).

4. Plaintiff identified Thomas Carroll in discovery responses.

Plaintiff is now withdrawing his argument that Thomas Carroll should be excluded as a witness due to a confidentiality provision and now argues that he should be excluded based on an alleged delay in Defendant identifying him. See Reply at 10. First, contrary to Plaintiff's stated ignorance of Mr. Carroll's possession of information relevant to this case, Plaintiff has now voluntarily promised to produce its settlement agreement with him. See Reply at 10, Footnote 6. Second, Defendants included Mr. Carroll on their witness list only after Plaintiff identified him in response to written discovery in March 2009. See Defendants' Response, Ex. F at Interrogatory No. 15. Mr. Carroll was easily anticipated as a witness: Plaintiff sued him for copyright infringement based on the same allegedly copyrighted works and the identical damages at issue in this matter. Plaintiff fails to show any prejudice, harm, or surprise from having Mr. Carroll testify at trial. Plaintiff's motion to exclude Mr. Carroll should be denied.

5. Conclusion

Plaintiff is himself guilty of copying cheat codes from third-parties and incorporating them into his allegedly copyrighted work. Despite being given the opportunity in his reply brief affidavit, he does not deny that he has engaged in such copying. His copyright is invalid. The evidence and witness statements recently and inadvertently discovered by Defendants are certainly more solid and easily understood than Plaintiff's ever-changing and elusive

infringement contentions. Plaintiff should not be able to introduce new evidence of infringement after Defendant has repeatedly requested specific examples of Plaintiff's allegations.

Defendants maintain that they disclosed the witnesses in dispute in a timely manner and in accordance with Defendants' duties under Rule 26(e) as the Defendants disclosed them promptly after their discovery. Assuming, *arguendo*, it could be said that the disclosures were disclosed untimely, exclusion remains unwarranted under 37(c)(1). Any alleged delay was caused by Plaintiff's dilatory litigation tactics in continuing, to this day, to withhold his infringement contentions. Any alleged delay was further caused by Plaintiff's continued cover-up of the fact that he has habitually copied the work of third-parties into his website of which he alleges ownership and sole authorship. On these grounds, and in view of Plaintiff's culpability, Defendants respectfully request that Plaintiff's motion be denied and reiterate their request for attorneys' fees and costs in responding to Plaintiff's motion and reply.

Respectfully submitted,

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IN THE UNITED STATES DISTRICT COURT FOR THE
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DAVID ALLISON DBA CHEAT CODE
CENTRAL,

Plaintiff,

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JEREMY N. WISE, and
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Defendants.

Case No. 2:08-cv-00157

Judge Watson

Magistrate Judge Abel

SUPPLEMENTAL AFFIDAVIT OF CHARLES LEE MUDD, JR.

I, Charles Lee Mudd Jr., being duly sworn, do hereby declare, testify and state as follows:

1. I am a resident and citizen of the State of Illinois.
2. I am licensed to practice law in the States of Illinois, Indiana, Connecticut, and Utah.
3. In this action, I represent the Defendants Jeremy Wise and Wise Buy Now, LLC.
4. I submit this affidavit in support of Defendants' Sur-Reply in Opposition to Plaintiff's

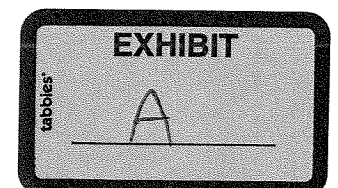
Motion for Sanctions.

5. I provide the following statements based upon my present knowledge of the facts related to the above-captioned action and my knowledge obtained through experience with similar cases.

6. The Defendants and their counsel have had difficulty obtaining contact information and signed statements from many of the witnesses identified by Defendants in July 2009.

7. At the time the Defendants disclosed the witnesses in July 2009, the Defendants produced all known contact information. The Defendants will continue to supplement contact information as it becomes available.

8. The Plaintiff has failed to identify the "substantial portions" of his website that have allegedly been infringed beyond the twelve examples disclosed in March 2009.



9. My staff and I reviewed web pages of both www.cheatcc.com and www.gamewinners.com.
10. My staff and I saved these web pages as PDF documents on the server of Mudd Law Offices.
11. I have attached some of these PDF documents as Exhibit 1 hereto.
12. Each of the documents attached as Exhibit 1 hereto identify a uniform resource locator (url) to a web page from www.cheatcc.com or www.gamewinners.com, as the case may be. Additionally, each of the documents contains a date which represents the date the PDF was created.
13. The documents attached hereto as Exhibit 1 represent true, accurate and authentic representations of the cheat code content observed on each of the web pages identified by the applicable url (found on each document) as of the date indicated on each document.

I declare under the penalty of perjury that the foregoing are true and correct statements.

Dated this 5 day of October, 2009.



Charles Lee Mudd, Jr.

STATE OF Illinois)
) SS:
COUNTY OF Cook)

The foregoing AFFIDAVIT OF CHARLES LEE MUDD JR. has been subscribed and sworn to
me before this 5th day of October 2009, by Charles Lee Mudd Jr.



Lyudmila Janusonis

Notary Public

My Commission Expires: 7-31-2012

EXHIBIT 1

BLAZBLUE: CALAMITY TRIGGER

GameWinners.com

HOME | CHEATS | NEWS | REVIEWS | VIDEOS | FORUMS



BlazBlue: Calamity Trigger (Xbox 360)

From GameWinners

Unlockables

Astral Heat

Successfully complete Arcade mode with a character to unlock their Astral Heat. Note: Ragna already starts with his Astral Heat.

Unlimited characters

Complete the indicated task to unlock the corresponding character.

Unlimited Hakumen: Complete Hakumen's Arcade mode.

Unlimited Rachel: Complete Rachel's Arcade mode.

Unlimited Ragna: Complete Ragna's Arcade mode.

Unlimited v-13: Complete v-13's Arcade mode.

Nu and Hakumen

Get a 100% completion with all ten starting characters.

Fight Unlimited Ragna in Arcade mode

Get a "Distortion Finish" more than ten times and do not lose any rounds. You will be challenged by Unlimited Ragna after your last opponent has been defeated.

tpernao csrfrmy sfnb ftaaeed

Japanese audio interview

Get 100% completion on a character's Story mode to unlock the bonus audio track in Gallery mode for that character.

True ending

Successfully complete Story mode with all characters.

Contents

- 1 Unlockables
 - 1.1 Astral Heat
 - 1.2 Unlimited characters
 - 1.3 Nu and Hakumen
 - 1.4 Fight Unlimited Ragna in Arcade mode
 - 1.5 Japanese audio interview
 - 1.6 True ending
- 2 Achievements
- 3 More...



Achievements

Complete the following achievements to unlock Xbox Live Gamerscore points.

- Dante (30 points):** (Arcade mode) Beat Arcade mode on the highest difficulty.
- Leonidas (40 points):** (Score Attack mode) Beat Score Attack mode.
- I Am the Just Sword (20 points):** (Arcade or Score Attack mode) Defeat Hakumen in Arcade / Score Attack mode.
- Murakumo Activated... (20 points):** (Arcade or Score Attack mode) Defeat v-13 in Arcade / Score Attack mode.
- Wanderer (10 points):** (Player Match mode) Experience a Player Match.
- Warrior (30 points):** (Player Match mode) Experience is power.
- Voyeur (10 points):** (Player Match mode) Learn from the mistakes of others.
- Ruler of Kagutsuchi (10 points):** [Ranked Match / Player Match] Fight against different opponents.
- Be Gentle... It's My First Time. (10 points):** [Ranked Match] Experience a Ranked Match.
- That Was Incredible! (10 points):** [Ranked Match] Conquer a Ranked Match.
- You Brute! (20 points):** [Ranked Match] Win several Ranked Matches in a row.
- 100 Trials (20 points):** [Ranked Match] Strive higher in Ranked Matches.
- 200 Trials (40 points):** [Ranked Match] Strive even higher in Ranked Matches.
- Hands Where I Can See Them (30 points):** (Gallery mode) Collect more art!
- I Like to Watch (10 points):** (Replay Theater mode) Collect replay data.
- Hello World ! (10 points):** (Story mode) Understand the truth of the story.
- You're the Best! Around! (20 points):** (Training mode) You still have much to learn.
- Legionnaire (20 points):** Increase your level.
- Praetorian Guardsman (30 points):** Increase your level even more.

Additionally there are thirty one secret achievements.

- Words Hurt Too (30 points):** Let an opponent get a 5,000 hit-point lead on you, then taunt you.
- Designated Driver (30 points):** Used Distortion Drive over 100 times.
- Their Numbers Count for Nothing (20 points):** Performed an instant block 300 times.
- Greased Pig (10 points):** Successfully escaped 50 throws.
- Restraining Order (20 points):** Used Barrier Burst over 30 times.
- I'm Faster Than Anybody (20 points):** (Ranked / Player Match) Get "First Strike" five times in a row.
- Hat-Trick (10 points):** In one match, successfully pulled off "Thirteen Orphans", "The Great Wheel", and "All Green".
- In Living Color (10 points):** Used all the color palettes of a single character.
- It's Go Time (10 points):** Performed your first Astral Heat.
- Devil's Advocate (20 points):** Used Ragna's "Gauntlet Hades" over 100 times.
- This Is Important... (20 points):** Heard Noel say, "Hands off the panda!" over 100 times.
- I Can Rebuild Her... (10 points):** As Carl, decommissioned Nirvana three times in one round.
- Activate Termination Protocol (30 points):** Completed a 60+ hit combo using Nu.
- Nothing's Gonna Keep You Down (30 points):** Earned a Perfect victory 30 times.
- It's over 10,000! (30 points):** Dealt over 10,000 damage using Hakumen, without the use of an Astral Heat.
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Note: Ragna already starts with his Astral Heat.
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 Get a 100% completion with all ten starting characters to unlock Hakumen and Nu.
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 The Most Impassioned (10 points): Complete a Ranked Match.

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Recently, it has been rumored that the next Gears of War will get female COGs. What do you think?

- It's about time!
- It'd be a great way to break up the testosterone
- Are you serious?
- That's a bunch of hooley!
- If it's true, it'll be detrimental to the game
- Who cares?
- I hate Gears of War. Adding women won't save it

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- Japanese audio interview

Get a 100% completion in a character's Story mode to unlock the bonus audio track in [Gallery](#) mode for that character.

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Dynasty Warriors 6 Empires (Xbox 360)

From GameWinners

*This game is titled **Dynasty Warriors 6 Empires** in North America, Europe, and Australia, and **Shin Sangoku Musou 5 Empires** in Japan.*

Unlockables

Edit mode costumes

Successfully complete the indicated Mercenary missions in Empire mode to unlock the corresponding male and female costumes. Note: Complete the stages multiple times unlock all the pieces.

Hawk or Owl: "Shao Hua Bandits", "Ju Zhang Bandits", and "Hei Shan Bandits"

Imperial or Princess: "Guard Lady Cai Wenji", "Accompany Lady Cai Wenji" and "Defend Lady Cai Wenji"

Kung Fu or Summer: "Wu Tai Monk's Training", "Wu Tai Monk's Challenge" and "Wu Tai Final Trial"

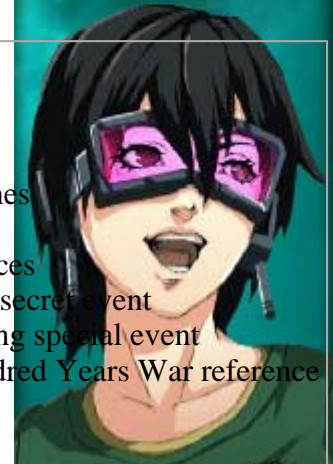
Occult or Sage: "Stop Insurrection", "Suppress Insurrection" and "Crush Insurrection"

Tribal or Wildcat: "Tribal Encounter", "Tribal Invasion" and "Tribal War"

Water Dragon or Pirate: "Jin Fan Pirates", "Qian Tang Pirates" and "Bai Bo Pirates"

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 - 2.3 Lu Meng's Training special event
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Hints

Easy costume pieces

Use the following trick to unlock all the costumes pieces without having to replay a level repeatedly. Play a level that unlocks the desired costume. Just before the level ends, select "Option" and save the game on file A. Complete the level to get a random costume piece. Then, save the game on file B. Load save file A and you will be back on that level. End the level to get another random costume piece. Save the game on file B, load file A, and repeat until all costume pieces are obtained.

Diao Chan's Plan secret event

When you become a ruler in Empire mode, be wary of the officer Diao Chan. Staying true to her namesake and Story mode, she has only one reason to enter your employ. When obtained, and a message stating, "Hearing of your deeds...." or something to that effect, "...Diao Chan decided to join you", dismiss her. She will steal some of your officers in this random event you cannot control or stop once in motion, saying "I can finally put my father's plan into action" or something similar, Note: If it instead states "Diao Chan entered your employ", the event most likely should not happen.

Michael Gutowski

Lu Meng's Training special event

When in Ruler mode and you obtain Lu Meng, he asks you to leave on a journey to train and learn. You have no say in the matter, but for a few months, his troop count falls to 1 (as in just himself). You are free to use him, but this is not wise, considering the effects of troop numbers in battles, which is very important compared to Officer mode. When he returns, he obtains a second ability, "Flames" (though it may be random), and his troop count returns to normal.

Michael Gutowski

Bladestorm: Hundred Years War reference

After completing Officer mode or possibly Empire mode in general you will unlock a Knight armor set. The armor set when examined, is from Bladestorm. It is the paladin set.

AzureBlaise

Achievements

Complete the following achievements to unlock Xbox Live Gamerscore points.

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A Challenger Appears (15 points): Complete a battle as a custom character.

A Man of Vision (15 points): Complete a battle as Cao Cao.

Benevolent Ruler (15 points): Complete a battle as Liu Bei.

Brains and Beauty (15 points): Complete a battle as Yue Ying.

Bringer of Peace (15 points): Complete a battle as Cao Ren.

Cold as Ice (15 points): Complete a battle as Ling Tong.

Elegant Dancer (15 points): Complete a battle as Diao Chan.

Enchanting Beauty (15 points): Complete a battle as Zhen Ji.
Exquisite Flower (15 points): Complete a battle as Xiao Qiao.
Feared Throughout the Land (15 points): Complete a battle as Zhang Liao.
Fierce Barbarian (15 points): Complete a battle as Wei Yan.
God of War (15 points): Complete a battle as Guan Yu.
Gourmand (15 points): Complete a battle as Xu Zhu.
Grand Master (15 points): Complete a battle as Zhang Jiao.
Hot Blooded (15 points): Complete a battle as Sun Ce.
Jovial Warrior (15 points): Complete a battle as Zhang Fei.
Little Dragon (15 points): Complete a battle as Zhao Yun.
Loyal Companion (15 points): Complete a battle as Zhou Yu.
Master of Intrigue (15 points): Complete a battle as Sima Yi.
Master of Strategy (15 points): Complete a battle as Zhuge Liang.
Menace on the Battlefield (15 points): Complete a battle as Dian Wei.
Mightiest in the Land (15 points): Complete a battle as Lu Bu.
Mysterious Traveler (15 points): Complete a battle as Pang Ting.
Nanman King (15 points): Complete a battle as Meng Huo.
One-Eyed Wolf (15 points): Complete a battle as Xiahou Dun.
Paradise of Tyranny (15 points): Complete a battle as Dong Zhuo.
Pillar of Wu (15 points): Complete a battle as Huang Gai.
Proud Nobleman (15 points): Complete a battle as Yuan Shao.
Quick as Lightning (15 points): Complete a battle as Xiahou Yuan.
Refined Warrior (15 points): Complete a battle as Zhang He.
Righteous Crusader (15 points): Complete a battle as Ma Chao.
Rising Star of Wu (15 points): Complete a battle as Lu Xun.
Rough-and-tumble (15 points): Complete a battle as Gan Ning.
Seasoned Veteran (15 points): Complete a battle as Huang Zhong.
Silent Warrior (15 points): Complete a battle as Zhou Tai.
Son of the God of War (15 points): Complete a battle as Guan Ping.
The Warrior's Act (15 points): Complete a battle as Xu Huang.
Tiger of Jiang Dong (15 points): Complete a battle as Sun Jian.
Tomboy of Sun (15 points): Complete a battle as Sun Shang Xiang.
Triumph of Knowledge (15 points): Complete a battle as Lu Meng.
Unrivalled Ambition (15 points): Complete a battle as Cao Pi.
Unwavering Honor (15 points): Complete a battle as Taishi Ci.
Young Tiger (15 points): Complete a battle as Sun Quan.

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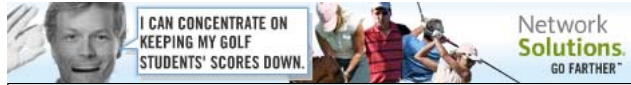
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Dynasty Warriors 6: Empires

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Note: This [game](#) is also titled Shin Sangoku Musou 5: Empires.

- Edit mode costumes

Successfully complete the indicated Mercenary missions in Empire mode to unlock the corresponding male and female costumes. **Note:** Complete the stages multiple times to unlock all the pieces.

Hawk/Owl: "Shao Hua Bandits", "Ju Zhang Bandits", and "Hei Shan Bandits"
 Imperial/Princess: "Guard Lady Cai Wenji", "Accompany Lady Cai Wenji" and "Defend Lady Cai Wenji"
 Kung Fu/Summer: "Wu Tai Monk's Training", "Wu Tai Monk's Challenge" and "Wu Tai Final Trial"
 Occult/Sage: "Stop Insurrection", "Suppress Insurrection" and "Crush Insurrection"
 Tribal/Wildcat: "Tribal Encounter", "Tribal Invasion" and "Tribal War"
 Water Dragon/Pirate: "Jin Fan Pirates", "Qian Tang Pirates" and "Bai Bo Pirates"

- Easy costume pieces

Use the following trick to unlock all the costumes pieces without having to replay a level repeatedly. Play a level that unlocks the desired costume. Just before the level ends, select "Option", and save the [game](#) on file A. Complete the level to get a random costume piece. Then, save the game on file B. Load [save file](#) A, and you will be back on that level. Complete the level again to get another random costume piece. Save the game on file B, load file A, and repeat until all costume pieces are unlocked.

- Diao Chan's Plan secret event

When you become a ruler in Empire mode, be wary of the officer Diao Chan. Staying true to her namesake and Story mode, she has only one reason to enter your employ. When obtained, and a message stating, "Hearing of your deeds..." or something to that effect, "...Diao Chan decided to join you", dismiss her. She will steal some of your officers in this random event that you cannot control or stop once in motion, saying "I can finally put my father's plan into action" or something similar. **Note:** If it instead states "Diao Chan entered your employ", the event most likely should not happen.

- Lu Meng's Training special event

When in Ruler mode and you obtain Lu Meng, he asks you to leave on a journey to train and learn. You have no say in the matter, but for a few months, his troop count falls to 1 (as in just himself). You are free to use him, but this is not wise, considering the effects of troop numbers in battles, which is very important compared to Officer mode. When he returns, he obtains a second ability, "Flames" (though it may be random), and his troop count returns to normal.

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Xbox Evolved: Dynasty Warriors 6: Empires Review

Electronic Theatre In-depth Review: Dynasty Warriors 6: Empires

Gaming Union: Dynasty Warriors 6: Empires Review

Console Monster: Dynasty Warriors 6 Empires Review



- **Bladestorm: Hundred Years War** reference

After completing Officer mode you will unlock a Knight armor set. It is the Paladin Set from *Bladestorm: Hundred Years War*.

- **Achievements**

Accomplish the indicated achievement to get the corresponding number of Gamerscore points:

- A Challenger Appears (15 points): Complete a battle as a custom character.
- A Man of Vision (15 points): Cleared by completing a battle as Cao Cao.
- Benevolent Ruler (15 points): Cleared by completing a battle as Liu Bei.
- Brains and Beauty (15 points): Cleared by completing a battle as Yue Ying.
- Bringer of Peace (15 points): Cleared by completing a battle as Cao Ren.
- Cleared "Battle of Guan Du" (30 points): Cleared by reaching the end of the "Battle of Guan Du" scenario.
- Cleared "A Land in Chaos" (30 points): Cleared by reaching the end of the A Land in Chaos scenario.
- Cleared "Chi Bi" (30 points): Cleared by reaching the end of the Chi Bi scenario.
- Cleared "Three Kingdoms" (30 points): Cleared by reaching the end of the Three Kingdoms scenario.
- Cleared "Yellow Turbans" (30 points): Cleared by reaching the end of the Yellow Turban Rebellion scenario.
- Cleared All Scenarios (90 points): Cleared by reaching the end of all scenarios.
- Cold as Ice (15 points): Cleared by completing a battle as Ling Tong.
- Elegant Dancer (15 points): Cleared by completing a battle as Diaochan.
- Enchanting Beauty (15 points): Cleared by completing a battle as Zhen Ji.
- Exquisite Flower (15 points): Cleared by completing a battle as Xiao Qiao.
- Feared Throughout the Land (15 points): Cleared by completing a battle as Zhang Liao.
- Fierce Barbarian (15 points): Cleared by completing a battle as Wei Yan.
- God of War (15 points): Cleared by completing a battle as Guan Yu.
- Gourmand (15 points): Cleared by completing a battle as Xu Zhu.
- Grand Master (15 points): Cleared by completing a battle as Zhang Jiao.
- Hot Blooded (15 points): Cleared by completing a battle as Sun Ce.
- Jovial Warrior (15 points): Cleared by completing a battle as Zhang Fei.
- Little [Dragon](#) (15 points): Cleared by completing a battle as Zhao Yun.
- Loyal Companion (15 points): Cleared by completing a battle as Zhou Yu.
- Master of Intrigue (15 points): Cleared by completing a battle as Sima Yi.
- Master of Strategy (15 points): Cleared by completing a battle as Zhuge Liang.
- Menace on the Battlefield (15 points): Cleared by completing a battle as Dian Wei.
- Mightiest in the Land (15 points): Cleared by completing a battle as Lu Bu.
- Mysterious [Traveler](#) (15 points): Cleared by completing a battle as Pang Ting.
- Nanman King (15 points): Cleared by completing a battle as Meng Huo.
- One-Eyed [Wolf](#) (15 points): Cleared by completing a battle as Xiaohu Dun.
- Paradise of Tyranny (15 points): Cleared by completing a battle as Dong Zhuo.
- Pillar of Wu (15 points): Cleared by completing a battle as Huang Gai.
- Proud Nobleman (15 points): Cleared by completing a battle as Yuan Shao.
- Quick as Lightning (15 points): Cleared by completing a battle as Xiaohu Yuan.
- Refined Warrior (15 points): Cleared by completing a battle as Zhang He.
- Righteous Crusader (15 points): Cleared by completing a battle as Ma Chao.
- Rising Star of Wu (15 points): Cleared by completing a battle as Lu Xun.
- Rough-and-tumble (15 points): Cleared by completing a battle as Gan Ning.
- Seasoned Veteran (15 points): Cleared by completing a battle as Huang Zhong.
- Silent Warrior (15 points): Cleared by completing a battle as Zhou Tai.
- Son of the God of War (15 points): Cleared by completing a battle as Guan Ping.
- The Warrior's Act (15 points): Cleared by completing a battle as Xu Huang.
- Tiger of Jiang Dong (15 points): Cleared by completing a battle as Sun Jian.
- Tomboy of Sun (15 points): Cleared by completing a battle as Sun Shang Xiang.
- Triumph of Knowledge (15 points): Cleared by completing a battle as Lu Meng.
- Unlocked All Bonuses (115 points): Cleared by unlocking all bonus material.
- Unrivaled Ambition (15 points): Cleared by completing a battle as Cao Pi.
- Unwavering Honor (15 points): Cleared by completing a battle as Taishi Ci.
- Young Tiger (15 points): Cleared by completing a battle as Sun Quan.



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Overlord 2 (Xbox 360)

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Achievements

Complete the following achievements to unlock Xbox Live Gamerscore points.

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Rescuer of Kelda (15 points): Rescue Kelda from Nordberg.

Tyrant of Nordberg (25 points): Complete full Tyranny over Nordberg through either Domination or Destruction.

Industrious Magic (10 points): Achieve 50 kills by overcharging your Evil Presence Spell.

Big Chopper (10 points): Achieve 50 melee kills.

Red Rescuer (10 points): Find the Red Minions.

Green Grabber (10 points): Find the Green Minions.

Blue Bringer (10 points): Find the Blue Minions.

The Dominator (40 points): Achieve a 100% Domination Tyranny rating.

The Destructor (40 points): Achieve a 100% Destruction Tyranny rating.

Scrooge (20 points): Collect 50,000 gold.

Juno's Special Friend (20 points): Buy gifts for Juno and woo her into becoming your 'special' friend.

Dark Fay's Special Friend (20 points): Buy gifts for Dark Fay and woo her into becoming your 'special' friend.

Ghost Fay's Special Friend (20 points): Buy gifts for Ghost Fay and woo her into becoming your 'special' friend.

Snatcher (10 points): Win one Pirate Plunder map.

Pillager (20 points): Win ten Pirate Plunder maps.



Conqueror (10 points): Win one Dominate map.
The Big D (20 points): Win ten Dominate maps.
Adversary (20 points): Kill an opposing Overlord 20 times in ranked versus matches.
Armed and Dangerous (10 points): Forge one weapon.
Blue Steel Look (10 points): Forged the Elemental helmet and armor.
Minion Captain (10 points): Rescue all the Minion crew from the spider webs.
Weapons Nut (20 points): Forge three weapons.
Kitted Out (20 points): Forge the Infernal helmet and armor .
Mayhem Maker (10 points): Cause mayhem during the Prelude.
Minion Harvester (10 points): Gather 10 Lifeforce orbs.
Minion Gatherer (20 points): Gather 250 Lifeforce orbs.
Minion Hoarder (25 points): Gather 1000 Lifeforce orbs.
Minion Lover (30 points): Gather 5000 Lifeforce orbs.
Town Razer (15 points): Destroy one Town.
Walking Apocalypse (30 points): Destroy both Nordberg and Everlight.
Slaver (15 points): Enslave one Town.
New World Order (30 points): Enslave both Nordberg and Everlight.

Additionally there are seventeen secret achievements.

Juno's Champion (15 points): Juno has become your Mistress.
Corruptor of the Queen (15 points): Dark Fay has become your Mistress.
Kelda's Special Friend (20 points): Kelda is now your "special" friend.
Tyrant of Everlight (25 points): Through Domination or Destruction you are now the Tyrant of Everlight.
Seal Slayer (20 points): You have killed 100 baby seals.
Dark Emperor (30 points): You have killed Solarius.
Secret achievement (30 points): Unknown.
Secret achievement (15 points): Unknown.
Secret achievement (30 points): Unknown.
Secret achievement (50 points): Unknown.
Secret achievement (15 points): Unknown.
Secret achievement (30 points): Unknown.
Mount Master (20 points): You have discovered and used all Minion Mounts in the game.
Gnome Grinder (20 points): You've killed 1000 gnomes.
Rock On (20 points): You've killed 15 or more enemies with a single Catapult boulder.
Secret achievement (40 points): Unknown.
Secret achievement (20 points): Unknown.

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