

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
BIG STONE GAP DIVISION**

UNITED STATES OF AMERICA)	
)	
v.)	
)	
DANIEL DOVE,)	Case No. 2:07cr00015
)	
Defendant.)	
)	

**DEFENDANT’S MOTION TO COMPEL COMPLIANCE WITH SUBPOENA
BY THE MOTION PICTURE ASSOCIATION OF AMERICA, INC.**

COMES NOW Defendant Daniel J. Dove, by Counsel, pursuant to Fed. R. Crim. P. 17 and the Subpoena Duces Tecum issued by this Court on May 5, 2008 pursuant to the Court’s Order of April 16, 2008, and served on the Motion Picture Association of America, Inc. (hereinafter “MPAA”) on May 9, 2008, to move this Honorable Court to compel the MPAA to forthwith produce the documents commanded in the Subpoena Duces Tecum, namely “[a]ll documents or objects in the possession of the.[MPAA] dating from August 1, 2004 to the present referencing Daniel Dove or reflecting communications by or with Daniel Dove.”

Respectfully submitted,
Daniel J. Dove

By: /s/ Michael B. Gunlicks
Counsel

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Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on June 2nd, 2008, I caused to be electronically filed the above and foregoing **DEFENDANT'S MOTION TO COMPEL COMPLIANCE WITH SUBPOENA** with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the following attorneys of record:

Tyler G. Newby, Esq.
Computer Crime & Intellectual Property
Section, Criminal Division
US Department of Justice
Suite 600
1301 New York Avenue, N.W.
Washington, DC 20530

Steven R. Ramseyer, Esq.
US Attorney's Office
180 W. Main Street
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Jay Prabhu, Esq.
U.S. Attorney's Office
Eastern District of Virginia
2100 Jamieson Ave.
Alexandria, VA 22314

2). I hereby certify that on June 2nd, 2008 I served by US Mail and by electronic mail a copy of the foregoing on counsel for the Motion Picture Association of America, Inc:

Orit H. Michiel, Esq.
Motion Picture Association of America, Inc.
15301 Ventura Boulevard
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Sherman Oaks, CA 91403

/s/ Michael B. Gunlicks
Attorney for Defendant