

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
NORTHERN DIVISION AT COVINGTON

JANE DOE,	:	Case No. 2:09-CV-219-WOB
	:	
Plaintiff	:	Judge William O. Bertelsman
	:	
vs.	:	MOTION FOR LEAVE TO FILE
	:	AMENDED COMPLAINT
DIRTY WORLD ENTERTAINMENT	:	<i>INSTANTER</i>
RECORDINGS, LLC, <i>et al.</i> ,	:	
	:	
Defendants	:	

Plaintiff moves, pursuant to Fed. R. Civ. P. 15(a), for leave to amend her complaint *instanter*.

Hooman Karamian, also known as Nik Richie, also known as Corbin Grimes, owns and posts on thedirty.com. Since the default judgment against Dirty World Entertainment Recordings, LLC (DWER, LLC) was publicized, Nik Richie has told news outlets that he has nothing to do with DWER, LLC. We do not trust that his statement is true. Our research prior to filing our lawsuit indicated the entity was a California entity, and this led us to believe this was the correct entity.

However, we are still in the process of attempting to personally serve Hooman Karamian. This is being accomplished through an investigative service. We planned on and knew before the default we needed to still bring him before the Court.

We would like to add as Defendants Dirty World, LLC (DW), and Dirty World Entertainment LLC (DWE), and serve them too. We do not trust him, but Karamian claims Dirty World, LLC is the entity. The website thedirty.com lists the owner as Dirty World LLC (no address, but the copyright information page shows an Arizona phone number for DMCA notices), but other current website records indicate Dirty World Entertainment, LLC is owner. Trademarks associated with Dirty World, LLC show it is a Delaware LLC, while Arizona Corporation records show Dirty World Entertainment, LLC to be an Arizona Entity.

No Defendant named, DWER, LLC or Hooman Karamian has filed any responsive pleading.

After service upon Dirty World, LLC, Dirty World Entertainment LLC, or Hooman Karamian, we will either litigate against those parties here or move for default against them as well. We relish a jury trial. The verdict could exceed the default judgment amount. Hooman Karamian's conduct violates all sense of common decency.

The entity DWER, LLC never accepted service, never contacted us and has never publicly denied they are not connected to thedirty.com.

Our information showed they were connected to thedirt.com and believe they are also involved in thedirty.com.

Although thedirty.com began in Scottsdale, AZ, they went "national" and we believe DWER, LLC was one of the entities they may have used to do that.

In addition, there is the issue of Jay Gardina, porn star Jena Jamison's ex-husband, who at least one lawyer has told us may be the owner of this website. He may have to be named later.

Accordingly, plaintiff requests leave to file the attached amended complaint *instanter*.

/s/ Eric C. Deters

Eric C. Deters (81812)

Attorney for Plaintiff

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served upon the persons named below by the Court's ECF system on August 27, 2010.

/s/ Eric C. Deters

cc:

N/A