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Exhibit  
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December 27, 2002

██████████  
██████████  
Oakland, MI 48363

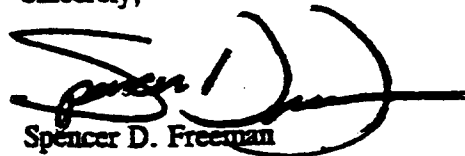
Re: Satellite Signal Theft

Dear Mr. ████████:

As you are aware, this law firm represents DIRECTV, Inc. in the prosecution of civil cases relating to the illegal possession and/or use of devices designed to aid in the unauthorized reception of its satellite television programming. As I previously informed you, your purchase and use of satellite signal theft equipment violates federal and state laws. In my earlier letter I requested that you contact me regarding your purchase, possession, and use of this illegal equipment. Regrettably, I have not heard from you. Consequently, DIRECTV has instructed me to give you a final opportunity to resolve this dispute prior to judicial action. If I do not hear from you within ten (10) days from the date of this letter, DIRECTV has instructed me to file a lawsuit based on the draft complaint enclosed with this letter.

DIRECTV remains committed to resolving this matter outside of court and in an amicable manner. However, unless I hear from you within the next ten days, DIRECTV can only conclude that you do not wish to pursue such an alternative.

Sincerely,



Spencer D. Freeman  
Deborah T. Boylston  
Gurjit Pandher

Enclosure

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DIRECTV, Inc., a California corporation,

Plaintiff,

v.

[REDACTED]

Defendant.

No.

**COMPLAINT FOR  
COMPENSATORY, STATUTORY  
AND OTHER DAMAGES, AND FOR  
INJUNCTIVE RELIEF**

Plaintiff DIRECTV, Inc., through its attorneys, alleges as follows:

**INTRODUCTION**

1. Plaintiff DIRECTV is the nation's leading direct broadcast satellite system, delivering over 225 channels of television and other programming to more than 10 million homes and businesses in the United States. DIRECTV's television programming currently includes major cable networks, studio movies and special events programming, as well as a variety of sports and other special interests programming. DIRECTV, a California company, has invested more than \$1.25 billion to develop its direct broadcast satellite system.

2. DIRECTV encrypts - electronically scrambles - its satellite transmissions to provide security for and prevent unauthorized viewing of its satellite television programming. DIRECTV offers its television programming to residential and business customers on a subscription and pay-per-view basis only. Each customer is required to obtain a DIRECTV Access Card and other system hardware (including a small satellite dish) and create an account with DIRECTV. Upon activation of the Access Card by DIRECTV, the customer can receive and view in a decrypted format (i.e., unscrambled)

COMPLAINT FOR COMPENSATORY, STATUTORY  
AND OTHER DAMAGES, AND FOR INJUNCTIVE  
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1 those channels to which the customer has subscribed or otherwise made arrangement to  
2 purchase from DIRECTV.

3 3. On May 25, 2001, DIRECTV executed Writs of Seizure, with the  
4 assistance of local law enforcement, at the mail shipping facility used by several major  
5 sources of pirate technologies including Vector Technologies, DSS-Stuff, DSSPro, DSS-  
6 Hangout, White Viper Technologies, Meadco, Intertek, Shutt Inc. and Canadian Security  
7 and Technology. During the raids and subsequent, DIRECTV came into possession of a  
8 substantial body of shipping records, email communications, credit card receipts and  
9 other records. Those records evidence defendant's purchases of illegal Pirate Access  
10 Devices. In reliance upon those records and other information, and upon information and  
11 belief, DIRECTV sets forth the allegation and this complaint.  
12

13 4. Defendant is a resident of this District. DIRECTV alleges that defendant  
14 has purchased and used illegally modified DIRECTV Access Cards and other devices  
15 ("Pirate Access Devices") that are designed to permit viewing of DIRECTV's television  
16 programming without authorization by or payment to DIRECTV.  
17

18 5. Defendant's actions violate the Federal Communications Act of 1934, as  
19 amended, 47 U.S.C. § 605; the Electronic Communications Privacy Act ("Federal  
20 Wiretap Laws"), 18 U.S.C. §§ 2510-2521; DIRECTV brings this action to restrain these  
21 illegal activities against it.  
22

### 23 PARTIES

24 6. Plaintiff DIRECTV, Inc. is a corporation duly incorporated under the laws  
25 of the State of California. DIRECTV has significant interests in maintaining and securing  
26

COMPLAINT FOR COMPENSATORY, STATUTORY  
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1 the integrity of its satellite transmissions of television programming, and in prohibiting  
2 the unauthorized reception and use of the same.

3 7. Defendant [REDACTED] is a resident of Oakland, Michigan. Upon  
4 information and belief, defendant [REDACTED] purchased one or more device that had the  
5 principle design and intent to aid in the unauthorized reception of DIRECTV satellite  
6 television signals. Defendant placed each order by using interstate or foreign wire  
7 facilities, and received his orders via the United States Postal Service or commercial mail  
8 carriers. The device was shipped and delivered to defendant.

#### 9 JURISDICTION AND VENUE

10 8. This action arises under the Federal Communications Act of 1934, as  
11 amended, 47 U.S.C. § 605; the Electronic Communications Privacy Act ("Federal  
12 Wiretap Laws"), 18 U.S.C. §§ 2510-2521.

13 9. This Court has original jurisdiction pursuant to 28 U.S.C. §§ 1331 and  
14 1338(a), 47 U.S.C. § 605(e)(3)(A) and 18 U.S.C. § 2520(a), and has supplemental  
15 jurisdiction pursuant to 28 U.S.C. § 1367(a) over the state law claims asserted herein.

16 10. Each defendant is a resident of this District. Personal jurisdiction and  
17 venue are proper in this District pursuant to 28 U.S.C. § 1391(b).

#### 18 FIRST CLAIM

#### 19 UNAUTHORIZED RECEPTION OF SATELLITE SIGNALS

#### 20 IN VIOLATION 47 U.S.C. § 605(a)

21 11. Plaintiff DIRECTV repeats and realleges the allegations in Paragraphs 1  
22 through 10 as if set forth fully herein.

23 12. Defendant has received and/or assisted others in receiving DIRECTV's  
24 satellite transmissions of television programming without authorization, in violation of 47  
25 U.S.C. § 605(a).

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1 (2) In accordance with 47 U.S.C. § 605(e)(3)(B)(i), and 18 U.S.C. §  
2 2520(b)(1),

3 enjoin and restrain defendants, and persons controlled directly and indirectly by  
4 defendants, from importing, possessing, or using Pirate Access Devices, and further  
5 order defendants to surrender all Pirate Access Devices;

6 (3) In the event of a default, an award of statutory damages of \$10,000 for  
7 each

8 Pirate Access Device imported into the United States in violation of 47 U.S.C. §  
9 605(e)(4), and a further award of DIRECTV's reasonable attorneys' fees and costs in  
10 the amount of \$850;

11 (4) In the event of trial, an award of either (a) statutory damages in accordance  
12 with 47 U.S.C. § 605(e)(3)(C)(i)(II), and 18 U.S.C. § 2520(c)(2), or (b) compensatory  
13 and punitive damages in accordance with 605(e)(3)(C)(i)(I), 18 U.S.C. § 2520(c)(2), and  
14 Michigan common law, and DIRECTV's reasonable attorneys' fees and costs in  
15 accordance with 47 U.S.C. § 605(e)(3)(B)(iii), and 18 U.S.C. § 2520(b)(3);

16 (5) For such additional relief as the Court deems just and equitable.

17 Dated: December \_\_, 2002.

18 YARMUTH WILSDON CALFO PLLC

19 By: \_\_\_\_\_  
20 Scott T. Wilsdon  
21 (WSBA No. 20608)  
22 Spencer D. Freeman  
23 (WSBA No. 25069)

24 Attorneys for Plaintiff DIRECTV, Inc.

25  
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