

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

MOTOWN RECORD COMPANY, L.P.,)
et al.,)
) No. 04-CV-0439
Plaintiffs,)
)
v.)
)
DOES 1 – 252,)
)
Defendants.)
_____)

DECLARATION OF SETH SCHOEN

I, Seth Schoen, declare as follows:

1. I am a Staff Technologist with the Electronic Frontier Foundation (EFF), and make this declaration on my own personal knowledge.
2. The purpose of this declaration is to set forth facts, which were readily available to the Plaintiffs from free, public Internet sources at and before the time they filed suit, that establish that many of the unnamed defendants in the above-referenced case (hereinafter "Does") use Internet connections physically located far from this District and therefore are likely not located in this District.
3. EFF Legal Director Cindy A. Cohn supplied me with an electronic table of the Internet Protocol (IP) addresses that the plaintiffs attribute to each of the Doe defendants. A list of "Doe IP Addresses" is attached as Exhibit A.
4. I tried to use these addresses, just as plaintiffs here or any member of the public could have done, to find out more about where these particular Internet

users are located. There are many tools freely available to the public that help reveal where a person using a particular IP address is likely to be physically located.

5. One means of learning about where an IP address is physically located is known as "reverse domain name service" or "reverse DNS". When an Internet service provider ("ISP") allocates or prepares to allocate IP addresses to customers, it typically creates and publishes database records assigning a human-readable "domain name" to each numerical IP address. The reverse lookup information can be obtained by anyone using a program such as "host", or with web-based tools such as SamSpade.org's DNS lookup, <<http://samspade.org/t/dns?>>.

6. One of the purposes of reverse DNS service is to help interested parties learn more about what a computer is used for, what organization's network it is connected to, and, in many cases, where the computer is physically located. Typically, for home users of dial-up or broadband connections, such as DSL or cable-modem services, a domain name obtained from reverse DNS will identify the ISP that assigned the IP address.

7. In addition, such a domain name will frequently give an approximate physical location. For example, one of the Does here was alleged to have used the IP address 68.0.240.50. The reverse DNS database identifies this computer as "ip68-0-240-50.ri.ri.cox.net", revealing its likely physical location to be in or near the State of Rhode Island. This means that, in all likelihood, the subscriber using

this IP address is located in or near Rhode Island.

8. For each of the IP addresses alleged by plaintiffs to belong to Doe defendants, I used the "host" program to perform a reverse lookup against the publicly-accessible reverse DNS service. The list of domain names corresponding to the Doe IP addresses is attached as Exhibit B.

9. The web site for Cox.net includes a map of the communities where Cox provides Internet services. That map is attached as Exhibit C.

10. The domain names in Exhibit B contain certain two-letter abbreviation codes that appear to correspond to the communities where Cox provides Internet services. For example, some domain names contain the code "HR", which corresponds to "Hampton Roads", or "BR", which corresponds to "Baton Rouge", or "PH", which corresponds to "Phoenix".

11. On Monday, February 23, 2004, I spoke via telephone with a Cox representative, who confirmed to me that the correspondences I had observed between Cox's two-letter codes and Cox's service areas were correct. Cox's representative advised me that I was correct in my observation and correct in the particular correspondences I had identified.

12. On the basis of correspondences between the geographic codes in the domain names in Exhibit B and the map in Exhibit C, I conclude that Does identified in the complaint in this action appear to be located, among other places, in the vicinity of Omaha, NE; Santa Barbara and San Diego, CA; Las Vegas, NV;

15. In addition, other techniques and other publicly-available information can serve to identify and confirm the general physical location of a particular Internet user. These techniques were and are available to the plaintiffs here. Indeed, plaintiffs in this action likely determined that the Does identified here were Cox subscribers by using reverse DNS, or other similar techniques that also tend to indicate a subscriber's physical location.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this document was executed in San Francisco, California.

Respectfully submitted,

DATED: February 25, 2004

By _____
Seth Schoen

EXHIBIT A

IP addresses of Does identified by plaintiffs:

68.13.157.232
68.102.105.231
68.13.26.163
68.13.117.167
68.103.131.232
68.103.81.134
68.1.189.238
68.96.133.126
68.11.210.83
68.9.198.196
68.103.77.28
208.180.10.168
68.109.130.230
68.6.119.110
68.0.240.50
24.136.61.101
68.96.89.148
208.180.255.84
68.97.252.51
68.11.30.20
68.3.157.192
68.96.41.228
68.9.194.246
68.10.1.129
68.12.161.23
68.12.179.157
24.56.24.158
68.102.191.209
68.96.203.49
68.99.16.125
68.11.49.109
68.106.100.249
68.102.130.163
68.110.152.30
68.9.76.167
68.12.128.88
68.14.143.53

68.14.143.53
68.1.130.224
68.109.155.252
208.180.254.96
68.99.219.90
68.13.67.97
68.96.201.61
68.109.36.199
68.97.227.4
68.10.220.100
68.0.222.138
68.102.148.117
68.5.153.98
68.110.83.87
68.3.188.186
208.180.25.35
68.13.149.76
68.0.28.239
68.102.123.164
68.12.178.17
68.103.111.26
68.107.186.237
68.4.173.208
68.106.250.185
68.0.28.124
68.99.198.63
68.11.72.6
68.103.130.245
68.99.180.41
68.105.59.123
68.1.189.172
68.11.73.99
68.2.44.85
68.11.126.38
68.97.171.115
68.102.162.238
68.106.58.183
68.12.251.123
68.9.145.173
68.11.119.181
68.99.188.39

68.1.45.39
68.108.45.97
68.109.9.59
68.102.142.16
68.97.171.115
68.111.125.150
68.5.227.29
68.0.77.136
24.56.20.100
68.97.69.209
68.99.165.120
68.13.217.159
68.14.32.238
68.10.97.110
68.107.192.117
68.3.31.218
68.2.197.223
68.0.166.99
68.10.80.241
68.2.246.9
68.100.3.27
68.109.12.6
68.111.9.164
68.11.69.9
68.2.193.226
68.108.15.189
68.1.149.195
68.99.171.21
68.6.45.252
68.110.138.104
68.99.100.225
68.96.164.7
68.14.3.189
68.13.45.110
68.2.107.82
68.106.255.114
68.0.234.217
68.0.241.71
68.109.75.21
68.14.1.4
68.97.41.143

68.13.44.244
68.96.32.232
68.105.248.47
68.109.218.244
68.0.121.230
68.97.122.248
68.9.145.157
68.96.40.225
24.56.25.97
68.99.209.226
68.105.130.98
68.109.196.59
68.96.42.87
68.97.222.231
68.103.119.76
68.14.66.19
68.9.221.187
68.110.90.126
68.98.103.29
68.100.31.139
68.103.121.112
68.13.182.220
68.97.57.236
68.102.224.48
68.110.239.92
68.13.50.155
68.3.84.142
68.104.224.154
68.1.65.54
68.11.20.108
68.106.24.54
68.3.254.178
68.0.95.124
68.1.94.107
68.9.44.13
68.224.213.182
68.106.65.221
68.224.160.58
68.2.239.85
68.109.222.231
68.111.87.82

68.97.8.4
68.0.149.99
68.103.70.47
68.111.75.93
68.9.31.71
68.11.66.88
24.234.232.165
68.1.95.19
68.14.116.50
68.224.211.183
68.0.226.71
68.97.46.109
68.109.128.4
68.0.120.232
68.10.87.106
68.9.53.133
66.76.157.156
68.13.133.148
68.104.184.232
68.110.7.19
68.106.64.35
68.0.129.80
68.11.117.173
66.76.158.219
68.97.50.175
68.106.102.68
68.102.206.77
68.108.84.52
68.106.172.47
68.110.9.168
68.14.57.64
68.109.162.188
68.98.40.173
68.10.239.119
68.96.32.219
68.107.144.142
68.98.122.9
68.102.77.1
68.10.232.53
68.1.31.63
68.11.111.15

68.98.32.177
68.102.42.37
68.102.202.19
68.14.181.25
68.14.45.214
68.224.201.219
66.233.44.232
68.3.69.140
68.2.192.16
68.224.119.230
68.0.148.89
68.108.77.151
68.109.113.155
68.13.78.163
68.102.253.6
68.1.160.221
68.97.216.233
68.1.68.193
68.11.47.73
68.99.23.22
68.9.147.116
68.12.103.135
68.99.6.249
68.103.26.57
68.96.49.221
68.98.39.9
208.180.229.92
68.14.170.53
68.96.35.59
68.106.192.135
68.0.63.229
68.102.192.171
68.102.233.26
68.12.246.9
208.180.242.75
68.97.166.142
68.106.116.250
68.14.170.53
68.100.43.240
68.1.27.132
68.224.160.114

68.11.45.165
68.11.93.222
68.110.25.241
68.13.235.197
68.106.211.47
68.4.162.77
68.2.24.176
68.2.186.202
68.102.222.210
68.103.43.157

EXHIBIT B

Domain names corresponding to Doe IP addresses, using reverse DNS service:

Name: ip68-13-157-232.om.om.cox.net
Address: 68.13.157.232

Name: ip68-102-105-231.ks.ok.cox.net
Address: 68.102.105.231

Name: ip68-13-26-163.om.om.cox.net
Address: 68.13.26.163

Name: ip68-13-117-167.om.om.cox.net
Address: 68.13.117.167

Name: ip68-103-131-232.ks.ok.cox.net
Address: 68.103.131.232

Name: ip68-103-81-134.ks.ok.cox.net
Address: 68.103.81.134

Name: ip68-1-189-238.ri.ri.cox.net
Address: 68.1.189.238

Name: ip68-96-133-126.om.om.cox.net
Address: 68.96.133.126

Name: ip68-11-210-83.br.no.cox.net
Address: 68.11.210.83

Name: ip68-9-198-196.ri.ri.cox.net
Address: 68.9.198.196

Name: ip68-103-77-28.ks.ok.cox.net
Address: 68.103.77.28

Name: cdm-208-180-10-168.cnro.cox-internet.com
Address: 208.180.10.168

Name: ip68-109-130-230.ph.ph.cox.net
Address: 68.109.130.230

Name: ip68-6-119-110.sb.sd.cox.net
Address: 68.6.119.110

Name: ip68-0-240-50.ri.ri.cox.net
Address: 68.0.240.50

Name: ip24-136-61-101.ga.at.cox.net
Address: 24.136.61.101

Name: ip68-96-89-148.oc.oc.cox.net
Address: 68.96.89.148

Name: cdm-208-180-255-84.bcst.cox-internet.com
Address: 208.180.255.84

Name: ip68-97-252-51.ok.ok.cox.net
Address: 68.97.252.51

Name: ip68-11-30-20.no.no.cox.net
Address: 68.11.30.20

Name: ip68-3-157-192.ph.ph.cox.net
Address: 68.3.157.192

Name: ip68-96-41-228.no.no.cox.net
Address: 68.96.41.228

Name: ip68-9-194-246.ri.ri.cox.net
Address: 68.9.194.246

Name: ip68-10-1-129.hr.hr.cox.net
Address: 68.10.1.129

Name: ip68-12-161-23.ok.ok.cox.net
Address: 68.12.161.23

Name: ip68-12-179-157.ok.ok.cox.net
Address: 68.12.179.157

Name: ip24-56-24-158.ph.ph.cox.net
Address: 24.56.24.158

Name: ip68-102-191-209.ks.ok.cox.net
Address: 68.102.191.209

Name: ip68-96-203-49.hr.hr.cox.net
Address: 68.96.203.49

Name: ip68-99-16-125.om.om.cox.net
Address: 68.99.16.125

Name: ip68-11-49-109.no.no.cox.net
Address: 68.11.49.109

Name: ip68-106-100-249.dc.dc.cox.net
Address: 68.106.100.249

Name: ip68-102-130-163.ks.ok.cox.net
Address: 68.102.130.163

Name: ip68-110-152-30.hr.hr.cox.net
Address: 68.110.152.30

Name: ip68-9-76-167.ri.ri.cox.net
Address: 68.9.76.167

Name: ip68-12-128-88.ok.ok.cox.net
Address: 68.12.128.88

Name: ip68-14-143-53.ri.ri.cox.net
Address: 68.14.143.53

Name: ip68-14-143-53.ri.ri.cox.net
Address: 68.14.143.53

Name: ip68-1-130-224.mc.at.cox.net
Address: 68.1.130.224

Name: ip68-109-155-252.ph.ph.cox.net
Address: 68.109.155.252

Name: cdm-208-180-254-96.bcst.cox-internet.com
Address: 208.180.254.96

Name: ip68-99-219-90.ph.ph.cox.net
Address: 68.99.219.90

Name: ip68-13-67-97.om.om.cox.net
Address: 68.13.67.97

Name: ip68-96-201-61.hr.hr.cox.net
Address: 68.96.201.61

Name: ip68-109-36-199.lu.dl.cox.net
Address: 68.109.36.199

Name: ip68-97-227-4.ok.ok.cox.net
Address: 68.97.227.4

Name: ip68-10-220-100.hr.hr.cox.net
Address: 68.10.220.100

Name: ip68-0-222-138.ri.ri.cox.net
Address: 68.0.222.138

Name: ip68-102-148-117.ks.ok.cox.net
Address: 68.102.148.117

Name: ip68-5-153-98.oc.oc.cox.net
Address: 68.5.153.98

Name: ip68-110-83-87.ph.ph.cox.net
Address: 68.110.83.87

Name: ip68-3-188-186.ph.ph.cox.net
Address: 68.3.188.186

Name: cdm-208-180-25-35.bcst.cox-internet.com
Address: 208.180.25.35

Name: ip68-13-149-76.om.om.cox.net
Address: 68.13.149.76

Name: ip68-0-28-239.hr.hr.cox.net
Address: 68.0.28.239

Name: ip68-102-123-164.ks.ok.cox.net
Address: 68.102.123.164

Name: ip68-12-178-17.ok.ok.cox.net
Address: 68.12.178.17

Name: ip68-103-111-26.ks.ok.cox.net
Address: 68.103.111.26

Name: ip68-107-186-237.lu.dl.cox.net
Address: 68.107.186.237

Name: ip68-4-173-208.oc.oc.cox.net
Address: 68.4.173.208

Name: ip68-106-250-185.ph.ph.cox.net
Address: 68.106.250.185

Name: ip68-0-28-124.hr.hr.cox.net
Address: 68.0.28.124

Name: ip68-99-198-63.ph.ph.cox.net
Address: 68.99.198.63

Name: ip68-11-72-6.no.no.cox.net
Address: 68.11.72.6

Name: ip68-103-130-245.ks.ok.cox.net
Address: 68.103.130.245

Name: ip68-99-180-41.oc.oc.cox.net
Address: 68.99.180.41

Name: ip68-105-59-123.pn.at.cox.net
Address: 68.105.59.123

Name: ip68-1-189-172.ri.ri.cox.net
Address: 68.1.189.172

Name: ip68-11-73-99.no.no.cox.net
Address: 68.11.73.99

Name: ip68-2-44-85.ph.ph.cox.net
Address: 68.2.44.85

Name: ip68-11-126-38.no.no.cox.net
Address: 68.11.126.38

Name: ip68-97-171-115.ok.ok.cox.net
Address: 68.97.171.115

Name: ip68-102-162-238.ks.ok.cox.net
Address: 68.102.162.238

Name: ip68-106-58-183.ph.ph.cox.net
Address: 68.106.58.183

Name: ip68-12-251-123.ok.ok.cox.net
Address: 68.12.251.123

Name: ip68-9-145-173.ri.ri.cox.net
Address: 68.9.145.173

Name: ip68-11-119-181.no.no.cox.net
Address: 68.11.119.181

Name: ip68-99-188-39.oc.oc.cox.net
Address: 68.99.188.39

Name: ip68-1-45-39.pn.at.cox.net
Address: 68.1.45.39

Name: ip68-108-45-97.lv.lv.cox.net
Address: 68.108.45.97

Name: ip68-109-9-59.pn.at.cox.net
Address: 68.109.9.59

Name: ip68-102-142-16.ks.ok.cox.net
Address: 68.102.142.16

Name: ip68-97-171-115.ok.ok.cox.net
Address: 68.97.171.115

Name: ip68-111-125-150.pn.at.cox.net
Address: 68.111.125.150

Name: ip68-5-227-29.oc.oc.cox.net
Address: 68.5.227.29

Name: ip68-0-77-136.tu.ok.cox.net
Address: 68.0.77.136

Name: ip24-56-20-100.ph.ph.cox.net
Address: 24.56.20.100

Name: ip68-97-69-209.ok.ok.cox.net
Address: 68.97.69.209

Name: ip68-99-165-120.hr.hr.cox.net
Address: 68.99.165.120

Name: ip68-13-217-159.hr.hr.cox.net
Address: 68.13.217.159

Name: ip68-14-32-238.no.no.cox.net
Address: 68.14.32.238

Name: ip68-10-97-110.hr.hr.cox.net
Address: 68.10.97.110

Name: ip68-107-192-117.cl.ri.cox.net
Address: 68.107.192.117

Name: ip68-3-31-218.ph.ph.cox.net
Address: 68.3.31.218

Name: ip68-2-197-223.ph.ph.cox.net
Address: 68.2.197.223

Name: ip68-0-166-99.tc.ph.cox.net
Address: 68.0.166.99

Name: ip68-10-80-241.hr.hr.cox.net
Address: 68.10.80.241

Name: ip68-2-246-9.ph.ph.cox.net
Address: 68.2.246.9

Name: ip68-100-3-27.dc.dc.cox.net
Address: 68.100.3.27

Name: ip68-109-12-6.pn.at.cox.net
Address: 68.109.12.6

Name: ip68-111-9-164.sb.sd.cox.net
Address: 68.111.9.164

Name: ip68-11-69-9.no.no.cox.net
Address: 68.11.69.9

Name: ip68-2-193-226.ph.ph.cox.net
Address: 68.2.193.226

Name: ip68-108-15-189.lv.lv.cox.net
Address: 68.108.15.189

Name: ip68-1-149-195.mc.at.cox.net
Address: 68.1.149.195

Name: ip68-99-171-21.ri.ri.cox.net
Address: 68.99.171.21

Name: ip68-6-45-252.sb.sd.cox.net
Address: 68.6.45.252

Name: ip68-110-138-104.nc.hr.cox.net
Address: 68.110.138.104

Name: ip68-99-100-225.hr.hr.cox.net
Address: 68.99.100.225

Name: ip68-96-164-7.lv.lv.cox.net
Address: 68.96.164.7

Name: ip68-14-3-189.ri.ri.cox.net
Address: 68.14.3.189

Name: ip68-13-45-110.om.om.cox.net
Address: 68.13.45.110

Name: ip68-2-107-82.ph.ph.cox.net
Address: 68.2.107.82

Name: ip68-106-255-114.ph.ph.cox.net
Address: 68.106.255.114

Name: ip68-0-234-217.ri.ri.cox.net
Address: 68.0.234.217

Name: ip68-0-241-71.ri.ri.cox.net
Address: 68.0.241.71

Name: ip68-109-75-21.oc.oc.cox.net
Address: 68.109.75.21

Name: ip68-14-1-4.ri.ri.cox.net
Address: 68.14.1.4

Name: ip68-97-41-143.ok.ok.cox.net
Address: 68.97.41.143

Name: ip68-13-44-244.om.om.cox.net
Address: 68.13.44.244

Name: ip68-96-32-232.no.no.cox.net
Address: 68.96.32.232

Name: ip68-105-248-47.lu.dl.cox.net
Address: 68.105.248.47

Name: ip68-109-218-244.lu.dl.cox.net
Address: 68.109.218.244

Name: ip68-0-121-230.tu.ok.cox.net
Address: 68.0.121.230

Name: ip68-97-122-248.ok.ok.cox.net
Address: 68.97.122.248

Name: ip68-9-145-157.ri.ri.cox.net
Address: 68.9.145.157

Name: ip68-96-40-225.no.no.cox.net
Address: 68.96.40.225

Name: ip24-56-25-97.ph.ph.cox.net
Address: 24.56.25.97

Name: ip68-99-209-226.ph.ph.cox.net
Address: 68.99.209.226

Name: ip68-105-130-98.tc.ph.cox.net
Address: 68.105.130.98

Name: ip68-109-196-59.oc.oc.cox.net
Address: 68.109.196.59

Name: ip68-96-42-87.no.no.cox.net
Address: 68.96.42.87

Name: ip68-97-222-231.ok.ok.cox.net
Address: 68.97.222.231

Name: ip68-103-119-76.ks.ok.cox.net
Address: 68.103.119.76

Name: ip68-14-66-19.ri.ri.cox.net
Address: 68.14.66.19

Name: ip68-9-221-187.ri.ri.cox.net
Address: 68.9.221.187

Name: ip68-110-90-126.ph.ph.cox.net
Address: 68.110.90.126

Name: ip68-98-103-29.ph.ph.cox.net
Address: 68.98.103.29

Name: ip68-100-31-139.dc.dc.cox.net
Address: 68.100.31.139

Name: ip68-103-121-112.ks.ok.cox.net
Address: 68.103.121.112

Name: ip68-13-182-220.om.om.cox.net
Address: 68.13.182.220

Name: ip68-97-57-236.ok.ok.cox.net
Address: 68.97.57.236

Name: ip68-102-224-48.ks.ok.cox.net
Address: 68.102.224.48

Name: ip68-110-239-92.dc.dc.cox.net
Address: 68.110.239.92

Name: ip68-13-50-155.om.om.cox.net
Address: 68.13.50.155

Name: ip68-3-84-142.ph.ph.cox.net
Address: 68.3.84.142

Name: ip68-104-224-154.ph.ph.cox.net
Address: 68.104.224.154

Name: ip68-1-65-54.pn.at.cox.net
Address: 68.1.65.54

Name: ip68-11-20-108.no.no.cox.net
Address: 68.11.20.108

Name: ip68-106-24-54.ph.ph.cox.net
Address: 68.106.24.54

Name: ip68-3-254-178.ph.ph.cox.net
Address: 68.3.254.178

Name: ip68-0-95-124.tu.ok.cox.net
Address: 68.0.95.124

Name: ip68-1-94-107.pn.at.cox.net
Address: 68.1.94.107

Name: ip68-9-44-13.cl.ri.cox.net
Address: 68.9.44.13

Name: ip68-224-213-182.lu.dl.cox.net
Address: 68.224.213.182

Name: ip68-106-65-221.lu.dl.cox.net
Address: 68.106.65.221

Name: ip68-224-160-58.om.om.cox.net
Address: 68.224.160.58

Name: ip68-2-239-85.ph.ph.cox.net
Address: 68.2.239.85

Name: ip68-109-222-231.lu.dl.cox.net
Address: 68.109.222.231

Name: ip68-111-87-82.oc.oc.cox.net
Address: 68.111.87.82

Name: ip68-97-8-4.ok.ok.cox.net
Address: 68.97.8.4

Name: ip68-0-149-99.tc.ph.cox.net
Address: 68.0.149.99

Name: ip68-103-70-47.ks.ok.cox.net
Address: 68.103.70.47

Name: ip68-111-75-93.oc.oc.cox.net
Address: 68.111.75.93

Name: ip68-9-31-71.ri.ri.cox.net
Address: 68.9.31.71

Name: ip68-11-66-88.no.no.cox.net
Address: 68.11.66.88

Name: wsip-24-234-232-165.lv.lv.cox.net
Address: 24.234.232.165

Name: ip68-1-95-19.pn.at.cox.net
Address: 68.1.95.19

Name: ip68-14-116-50.no.no.cox.net
Address: 68.14.116.50

Name: ip68-224-211-183.lu.dl.cox.net
Address: 68.224.211.183

Name: ip68-0-226-71.ri.ri.cox.net
Address: 68.0.226.71

Name: ip68-97-46-109.ok.ok.cox.net
Address: 68.97.46.109

Name: ip68-109-128-4.ph.ph.cox.net
Address: 68.109.128.4

Name: ip68-0-120-232.tu.ok.cox.net
Address: 68.0.120.232

Name: ip68-10-87-106.hr.hr.cox.net
Address: 68.10.87.106

Name: ip68-9-53-133.ri.ri.cox.net
Address: 68.9.53.133

Name: cdm-66-76-157-156.bcst.cox-internet.com
Address: 66.76.157.156

Name: ip68-13-133-148.om.om.cox.net
Address: 68.13.133.148

Name: ip68-104-184-232.ph.ph.cox.net
Address: 68.104.184.232

Name: ip68-110-7-19.tc.ph.cox.net
Address: 68.110.7.19

Name: ip68-106-64-35.lu.dl.cox.net
Address: 68.106.64.35

Name: ip68-0-129-80.tc.ph.cox.net
Address: 68.0.129.80

Name: ip68-11-117-173.no.no.cox.net
Address: 68.11.117.173

Name: cdm-66-76-158-219.bcst.cox-internet.com
Address: 66.76.158.219

Name: ip68-97-50-175.ok.ok.cox.net
Address: 68.97.50.175

Name: ip68-106-102-68.dc.dc.cox.net
Address: 68.106.102.68

Name: ip68-102-206-77.ks.ok.cox.net
Address: 68.102.206.77

Name: ip68-108-84-52.lv.lv.cox.net
Address: 68.108.84.52

Name: ip68-106-172-47.br.no.cox.net
Address: 68.106.172.47

Name: ip68-110-9-168.tc.ph.cox.net
Address: 68.110.9.168

Name: ip68-14-57-64.no.no.cox.net
Address: 68.14.57.64

Name: ip68-109-162-188.ph.ph.cox.net
Address: 68.109.162.188

Name: ip68-98-40-173.ph.ph.cox.net
Address: 68.98.40.173

Name: ip68-10-239-119.hr.hr.cox.net
Address: 68.10.239.119

Name: ip68-96-32-219.no.no.cox.net
Address: 68.96.32.219

Name: ip68-107-144-142.hr.hr.cox.net
Address: 68.107.144.142

Name: ip68-98-122-9.ph.ph.cox.net
Address: 68.98.122.9

Name: ip68-102-77-1.ks.ok.cox.net
Address: 68.102.77.1

Name: ip68-10-232-53.hr.hr.cox.net
Address: 68.10.232.53

Name: ip68-1-31-63.pn.at.cox.net
Address: 68.1.31.63

Name: ip68-11-111-15.no.no.cox.net
Address: 68.11.111.15

Name: ip68-98-32-177.ph.ph.cox.net
Address: 68.98.32.177

Name: ip68-102-42-37.ks.ok.cox.net
Address: 68.102.42.37

Name: ip68-102-202-19.ks.ok.cox.net
Address: 68.102.202.19

Name: ip68-14-181-25.pn.at.cox.net
Address: 68.14.181.25

Name: ip68-14-45-214.no.no.cox.net
Address: 68.14.45.214

Name: ip68-224-201-219.ri.ri.cox.net
Address: 68.224.201.219

Name: cdm-66-233-44-232.bcst.cox-internet.com
Address: 66.233.44.232

Name: ip68-3-69-140.ph.ph.cox.net
Address: 68.3.69.140

Name: ip68-2-192-16.ph.ph.cox.net
Address: 68.2.192.16

Name: ip68-224-119-230.lv.lv.cox.net
Address: 68.224.119.230

Name: ip68-0-148-89.tc.ph.cox.net
Address: 68.0.148.89

Name: ip68-108-77-151.lv.lv.cox.net
Address: 68.108.77.151

Name: ip68-109-113-155.ri.ri.cox.net
Address: 68.109.113.155

Name: ip68-13-78-163.om.om.cox.net
Address: 68.13.78.163

Name: ip68-102-253-6.ks.ok.cox.net
Address: 68.102.253.6

Name: ip68-1-160-221.ri.ri.cox.net
Address: 68.1.160.221

Name: ip68-97-216-233.ok.ok.cox.net
Address: 68.97.216.233

Name: ip68-1-68-193.pn.at.cox.net
Address: 68.1.68.193

Name: ip68-11-47-73.no.no.cox.net
Address: 68.11.47.73

Name: ip68-99-23-22.om.om.cox.net
Address: 68.99.23.22

Name: ip68-9-147-116.ri.ri.cox.net
Address: 68.9.147.116

Name: ip68-12-103-135.ok.ok.cox.net
Address: 68.12.103.135

Name: ip68-99-6-249.om.om.cox.net
Address: 68.99.6.249

Name: ip68-103-26-57.ks.ok.cox.net
Address: 68.103.26.57

Name: ip68-96-49-221.ph.ph.cox.net
Address: 68.96.49.221

Name: ip68-98-39-9.ph.ph.cox.net
Address: 68.98.39.9

Name: cdm-208-180-229-92.cnro.cox-internet.com
Address: 208.180.229.92

Name: ip68-14-170-53.ok.ok.cox.net
Address: 68.14.170.53

Name: ip68-96-35-59.no.no.cox.net
Address: 68.96.35.59

Name: ip68-106-192-135.pn.at.cox.net
Address: 68.106.192.135

Name: ip68-0-63-229.no.no.cox.net
Address: 68.0.63.229

Name: ip68-102-192-171.ks.ok.cox.net
Address: 68.102.192.171

Name: ip68-102-233-26.ks.ok.cox.net
Address: 68.102.233.26

Name: ip68-12-246-9.ok.ok.cox.net
Address: 68.12.246.9

Name: cdm-208-180-242-75.bcst.cox-internet.com
Address: 208.180.242.75

Name: ip68-97-166-142.ok.ok.cox.net
Address: 68.97.166.142

Name: ip68-106-116-250.dc.dc.cox.net
Address: 68.106.116.250

Name: ip68-14-170-53.ok.ok.cox.net
Address: 68.14.170.53

Name: ip68-100-43-240.dc.dc.cox.net
Address: 68.100.43.240

Name: ip68-1-27-132.pn.at.cox.net
Address: 68.1.27.132

Name: ip68-224-160-114.om.om.cox.net
Address: 68.224.160.114

Name: ip68-11-45-165.no.no.cox.net
Address: 68.11.45.165

Name: ip68-11-93-222.no.no.cox.net
Address: 68.11.93.222

Name: ip68-110-25-241.om.om.cox.net
Address: 68.110.25.241

Name: ip68-13-235-197.ok.ok.cox.net
Address: 68.13.235.197

Name: ip68-106-211-47.om.om.cox.net
Address: 68.106.211.47

Name: ip68-4-162-77.oc.oc.cox.net
Address: 68.4.162.77

Name: ip68-2-24-176.ph.ph.cox.net
Address: 68.2.24.176

Name: ip68-2-186-202.ph.ph.cox.net
Address: 68.2.186.202

Name: ip68-102-222-210.ks.ok.cox.net
Address: 68.102.222.210

Name: ip68-103-43-157.ks.ok.cox.net
Address: 68.103.43.157

EXHIBIT C

Map of Cox service areas (obtained from www.cox.net web site on February 23, 2004)



CERTIFICATE OF SERVICE

I hereby certify that, on this 24th day of February, 2004, I caused copies of the foregoing Declaration of Seth Schoen to be served by facsimile and first-class mail, postage prepaid, on counsel for plaintiffs as follows:

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February 24, 2004