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8 and Fenox Venture Capital, Inc.

**FILED**  
**SAN MATEO COUNTY**

JUL 20 2017

Clerk of the Superior Court  
By [Signature]  
DEPUTY CLERK

**SUPERIOR COURT OF CALIFORNIA**  
**COUNTY OF SAN MATEO**

11 MD ANIS UZZAMAN; and )  
12 FENOX VENTURE CAPITAL, INC., )

13 Plaintiffs, )

14 v. )

15 BRANDON K. HILL, aka )  
16 BRANDON KATAYAMA HILL, aka )  
17 BANKI KATAYAMA; and )  
18 DOES 2-20, inclusive, )

19 Defendants. )

CASE NO. 17CIV02443

**FIRST AMENDED COMPLAINT FOR  
DAMAGES AND DECLARATORY  
RELIEF**

20 Plaintiffs allege:



**PARTIES**

- 21 1. Plaintiff Md Anis Uzzaman (“Uzzaman”) is the CEO, President, and founding
- 22 member of Plaintiff Fenox Venture Capital, Inc.
- 23 2. Plaintiff Fenox Venture Capital, Inc. (“Fenox”) is a California Corporation.
- 24 3. Plaintiff amends this complaint to add as Doe 1 a defendant, Brandon K. Hill, also
- 25 known as Brandon Katayama Hill and Banki Katayama (hereinafter referred to as Defendant
- 26 Brandon Hill or Defendant(s)). Plaintiff is ignorant of the true names and a capacity of
- 27 defendants sued herein as DOES 2-20, inclusive, and therefore sues these defendants by such
- 28 fictitious names. Plaintiff will amend this complaint to allege their true names and capacities

10/4  
CNC

1 when ascertained. Plaintiff is informed and believes and thereon alleges that each of these  
2 fictitiously named defendants is responsible for the occurrences herein alleged, and that  
3 Plaintiff's injuries as herein alleged were proximately caused by these fictitiously named  
4 defendants.

### 5 GENERAL ALLEGATIONS

#### 6 Anonymous Defamatory Article Posted on Japanese Blog Hatena

7 4. On March 11, 2017, Defendants published false statements about Plaintiffs on a  
8 popular Japanese blog site called Hatena. The article, "Happenings in Silicon Valley - I was  
9 sexually taken advantage of by a Silicon Valley VC" is a defamatory article containing false  
10 accusations about Plaintiffs, accusing Plaintiffs of taking sexual advantage of the author and of  
11 employees of Plaintiff. The article is false and the purported abuses alleged in the article never  
12 occurred.

#### 13 Japanese Court Ordered Hatena to Produce IP Address Article was Posted From

14 5. The defamatory article was posted anonymously on Hatena. In order to uncover the  
15 identity of the author of this false article, Plaintiffs' attorneys in Japan requested that Hatena  
16 produce information which would help identify the poster. The matter was heard by the Tokyo  
17 District Court, 9th Civil Division, and on May 1, 2017, Tokyo District Court Judge Toshikhiko  
18 Okamoto ordered Hatena to release the IP address from which the article was posted, along with  
19 the date and time stamp that the article was posted to Hatena. Attached hereto as Exhibit A is a  
20 certified translated copy of Judge Okamoto's ruling, along with a copy of the original Japanese  
21 ruling.

#### 22 Hatena Produced IP Address Showing Article Posted to Blog From San Mateo County

23 6. In accordance with the Tokyo District Court Order, Hatena produced the IP address,  
24 posting date, and posting time for the defamatory blog article. Attached hereto as Exhibit B is a  
25 true and correct copy of the information as it was produced by Hatena in Japanese, along with a  
26 true and correct copy of the English translation. The Hatena production showed that the blog  
27 article was posted on March 11, 2017 at 23:05:14 Japan Standard Time (7:05 am Pacific  
28 Standard Time). The Hatena production showed that the defamatory article was posted from the

1 IP address 24.130.28.77. Publically accessible information provides that this IP address is  
2 owned by Comcast Cable Communications Holdings and is located in San Mateo County,  
3 California.

4 **Plaintiffs Filed Complaint in San Mateo County and Issued Subpoena to Comcast**

5 7. After discovering that the defamatory article was posted by someone in San Mateo  
6 County, California from a Comcast IP address, Plaintiffs then filed a complaint in San Mateo  
7 County Superior Court against Does 1-20 and obtained an ex parte order from this Court  
8 allowing Plaintiffs to issue a subpoena to Comcast.

9 8. Plaintiffs' counsel issued a subpoena to Comcast on June 6, 2017 to discover the  
10 identity of the subscriber using the referenced IP address at the time and date that the defamatory  
11 article was posted on Hatena.

12 **Comcast Has Now Confirmed that the IP Address at Issue was Assigned to Brandon Hill at**  
13 **the Time the Article was Posted to Hatena**

14 9. On or about July 12, 2017, Comcast produced a response to Plaintiffs' subpoena.  
15 Comcast provided the name, address, and phone number of the person using the referenced IP  
16 address at 7:05 am on March 11, 2017, the date and time that the defamatory article was posted  
17 to Hatena. A redacted true and correct copy of the Comcast production is attached hereto as  
18 Exhibit C. Comcast's production confirms that the subscriber using the referenced IP address at  
19 the time the defamatory article was posted is Defendant Brandon Hill.

20 **Defendant Brandon Hill**

21 10. Brandon Hill's internet wi-fi connection from which the defamatory article was  
22 posted is password protected.

23 11. Defendant Brandon Hill was born and raised in Japan, but currently resides in Daly  
24 City, California in the County of San Mateo. Defendant Brandon Hill is fluent in both English  
25 and Japanese and is a regular blogger, with a history of posting articles on the Japanese blog site  
26 Hatena.

27 12. Defendant Brandon Hill is the founder and CEO of btrax, a company with offices in  
28 California and Japan. Defendant Brandon Hill and Plaintiffs both operate business in the same

1 general domain, working with startup companies that are funded largely by Japanese  
2 corporations. While Plaintiffs obtain investment funds from Japanese large corporations for  
3 investment in startup companies globally, Defendant Brandon Hill performs consulting services  
4 for those Japanese large corporations to give them access to the Silicon Valley ecosystem.

5 13. Defendant Brandon Hill used to run an annual event in San Francisco called Japan  
6 Night, a startup competition event designed to increase awareness and collaboration between  
7 Japanese startups and the Silicon Valley ecosystem. Last year, Plaintiffs initiated their own  
8 startup competition called the Startup World Cup. Plaintiffs' events were a huge success and had  
9 widespread participation across the globe. Defendant Brandon Hill and his company btrax  
10 decided to discontinue their involvement with Japan Night last year, which would have been  
11 competing for some of the same participants as Plaintiffs' Startup World Cup.

12 14. Defendant Brandon Hill has spoken negatively about Plaintiffs to others in the  
13 Japanese - Silicon Valley startup community.

14 15. Brandon Hill's posting of the defamatory post has caused significant damage to  
15 Plaintiffs, as set forth below.

## 16 **FIRST CAUSE OF ACTION**

### 17 **Defamation**

18 16. Plaintiffs incorporate by reference paragraphs 1 through 15 of this complaint here, as  
19 though set forth in full.

20 17. On or about March 11, 2017, Defendants published statements in Japanese about  
21 Plaintiffs on a Japanese blog called Hatena. The statements were later republished on other  
22 websites. The following is an English translation of those statements:

23 **Happenings in Silicon Valley - I was sexually taken**  
24 **advantage of by a Silicon Valley VC**

25 3/11/2017

26 As I could not discuss this story with anyone, I decided to write it on a blog.

1 It happened a while ago, but I got sexually taken advantage of by a very famous Silicon  
2 Valley VC. It was not that I was in a relationship with him, I was just pushed around  
3 and taken advantage of.

4 But something has held me off from discussing this item with people around me.

5 I was living in Silicon Valley at one point and I met him at a local startup event for the  
6 first time. I was tensed at first since he was a popular figure.

7 Then he told me that he wanted to hear more from me and asked whether we can meet  
8 next week. I thought he wanted to talk about business, or something interesting.

9 The place where we met was a restaurant in Silicon Valley. It was kind of dark and had  
10 a good atmosphere.

11 We first started talking about business, but he later came after me. As I might lose my  
12 identity, I will not write much about me.

13 He asked, "I am going on a business trip, will you come with me? If you come with me,  
14 then you can stay at a 5-star hotel with me". I refused a few times, but he said, "You are  
15 going to lose the biggest opportunity if you do not come", he mentioned very strongly.

16 He said, "If you come with me, then you can operate in the global level. If I approve of  
17 you, I will invest in your startup". He said this almost like a dream to me.

18 He ended up pushing me to go to his hotel with him that night. But, after that, I was no  
19 longer able to communicate with him. He said, "I'm busy, don't contact me."

20 He is not a Japanese, but has good Japanese language skills and is a very famous VC,  
21 flying around the world.

22 He has dark skin color and sharp eyes. A lot of people are his fans. In the Japanese  
23 media, he is shown as the Silicon Valley representative VC.

24 He says that he does things for Japan, but in reality, he does it for money, power, and  
25 women.

26 Because he is a Silicon Valley VC, a lot of people from Japan, including students, and  
27 many very cute girls come to him, and he takes advantage of them.

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1 A little while ago, they ran into an internship problem, but he seemed not to care about  
2 it.

3 I came to know later that he has a lot of women working in his firm, including his  
4 personal assistant, and they are taken advantage of. Because of visa issues, they cannot  
5 discuss their stories with anyone since if they speak up, they will be sent back home.  
6 From the outside, it looks great, but on the back side, it is dark and I wanted everyone  
7 to know about this.

8 Recently, they are arranging a very big event. I really wanted to go, but I cannot go  
9 because of what happened.

10 I feel all of his business is fake.

11 I heard that there are also many other victims who fall into his trap. I feel sad when I  
12 think that there are so many great VCs in Silicon Valley, but there are people of his  
13 type as well.

14 18. This blog post was seen on the internet by a large number of people. While Plaintiffs  
15 are not specifically named in the blog post, it was reasonably understood that the article was  
16 about Uzzaman and Fenox, particularly by persons familiar with the Japan – Silicon Valley  
17 venture capital and startup communities. There are only a few Silicon Valley based companies  
18 that perform venture capital services specifically for Japan, and Fenox is the only company  
19 which has a non-Japanese leader with “dark skin”, who is fluent in Japanese, and makes frequent  
20 travels around the world as described in the post. This leader is Uzzaman. The fact that people  
21 familiar with the community reasonably understood that the article was about Plaintiffs is  
22 confirmed by statements posted in the comments section below the blog post that specifically  
23 referenced both Fenox and Uzzaman. Furthermore, the article referenced that the company has  
24 been organizing a large event recently, and Plaintiff Fenox has been organizing a series of global  
25 events, called the Startup World Cup, and its finale was held on March 24, 2017, approximately  
26 two weeks after the post.

27 19. The statements contained in the blog post referenced above are false. The true facts  
28 are that Defendants were not sexually taken advantage of by Plaintiffs. Uzzaman did not “push

1 around” Defendants. Plaintiff Uzzaman did not have the encounter described in the post. He did  
2 not meet a woman, ask her to go on a business trip and stay in 5-star hotel with him, and tell her,  
3 “You are going to lose the biggest opportunity if you do not come” or “If you come with me,  
4 then you can operate in the global level. If I approve of you, I will invest in your startup”. He  
5 did not push any woman to go to his hotel and afterwards tell her not to contact him. Plaintiff  
6 Uzzaman does not say that he does things for Japan, but in reality, do them for money, power,  
7 and women. Plaintiff Uzzaman does not take advantage of women. While Plaintiffs did deal  
8 with a dispute regarding payment to interns, this was several years ago, not a little while ago, and  
9 Plaintiffs did care about remedying the internship claims. Plaintiffs do not take advantage of  
10 Plaintiff Fenox’s female employees, including without limitation Plaintiff Uzzaman’s personal  
11 assistant. Plaintiffs do not threaten to send employees on visas back home if they make  
12 complaints. Plaintiffs’ business is not fake and Plaintiffs do not have “many victims.”

13 20. Defendants failed to use reasonable care to determine the truth or falsity of the  
14 statements in the blog post. Defendants intentionally posted the false statements online to cause  
15 damage to Plaintiffs’ reputation and aimed to maximize the damage to Plaintiffs by posting the  
16 false statements approximately two weeks before a large event hosted by Plaintiff Fenox.

17 21. The above-referenced statements by Defendants contained in this blog post constitute  
18 defamation per se because they accuse Plaintiffs of using their business to take advantage of  
19 females, including female employees, and states that their business is fake. These false  
20 allegations are injurious to Plaintiffs’ professional reputation. Furthermore, the above-referenced  
21 statements tend to expose Plaintiffs to hatred, contempt, ridicule, and shame and tended to  
22 discourage others from associating or dealing with Plaintiffs.

23 22. As a result of Defendants’ defamatory statements, Plaintiffs have suffered general  
24 damages to Plaintiffs’ reputation, and harm to Plaintiff Uzzaman’s occupation as a venture  
25 capitalist in an amount that is in excess of the minimum amount for the jurisdiction of this Court  
26 in an amount to be ascertained at trial in accordance with proof.

27 23. As a further proximate cause of Defendants’ defamatory statements, Plaintiffs have  
28 been harmed in that Plaintiffs have suffered past and future loss of income that Plaintiffs would

1 have earned if Plaintiffs had not been defamed. As a result of such defamation and consequent  
2 harm, Plaintiffs have suffered damages in an amount to be ascertained at trial in accordance with  
3 proof.

4 24. The above described defamatory statements constitute malice, fraud and oppression  
5 in that the Defendants deliberately published the blog post on the internet in order to discredit,  
6 and defame Plaintiffs. Defendants' defamatory statements constitute malicious conduct by  
7 Defendants and thereby warrant an assessment of punitive damages in an amount appropriate to  
8 punish Defendants and deter others from engaging in similar conduct.

9 WHEREFORE, Plaintiffs pray for judgment against Defendants as set forth below.

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**SECOND CAUSE OF ACTION**

**Trade Libel**

25. Plaintiffs incorporate by reference paragraphs 1 through 24 of this complaint here, as  
though set forth in full.

26. Defendants published statements online, as alleged above, that would be clearly or  
necessarily understood to have disparaged the quality of Plaintiff Fenox's services.

27. These statements were false, as alleged above.

28. Defendants knew that the statements were false or acted with reckless disregard of  
the truth or falsity of the statements.

29. Defendants knew or should have recognized that someone else might act in reliance  
on the statement, causing Plaintiff Fenox financial loss.

30. Plaintiff Fenox suffered direct financial harm because third parties acted in reliance  
on the published statements, and Defendants' conduct was a significant factor in causing Plaintiff  
Fenox's harm.

WHEREFORE, Plaintiffs pray for judgment against Defendants as set forth below.



1 **THIRD CAUSE OF ACTION**

2 **Declaratory and Injunctive Relief**

3 31. Plaintiffs incorporate by reference paragraphs 1 through 30 of this complaint here, as  
4 though set forth in full.

5 32. An actual controversy has arisen and now exists between Plaintiffs and Defendants  
6 concerning their respective rights and duties in that Plaintiffs contend that the statements alleged  
7 herein are defamatory and unlawful.

8 33. Plaintiffs desire a judicial determination declaring that the statements alleged herein,  
9 and any additional defamatory statements by Defendants posted on the internet during the course  
10 of this litigation, are unlawful and defamatory, and an injunction ordering that said statements by  
11 Defendants shall be taken down by the Defendants and internet host providers for such posts. A  
12 judicial declaration is necessary and appropriate at this time under the circumstances in order that  
13 Plaintiffs may ascertain their rights and have Defendants' defamatory statements concerning  
14 Plaintiffs removed from the internet by the internet host providers. Declaratory relief will also  
15 serve to reaffirm Plaintiffs' equal standing in the community, and will serve to condemn  
16 Defendants' defamatory publications.

17 34. Plaintiffs further desire an injunction requiring that all active search engines be  
18 required to de-index, de-list, and otherwise remove Defendants' defamatory statements  
19 concerning Plaintiffs and any related URL addresses referencing those statements from internet  
20 searches.

21 35. Defendants' wrongful conduct in posting defamatory statements concerning  
22 Plaintiffs, unless and until enjoined and restrained by order of this court, will cause great and  
23 irreparable injury to Plaintiffs as more individuals read the defamatory online posts concerning  
24 Plaintiffs.

25 36. Plaintiffs have no adequate remedy at law for the injuries currently being suffered  
26 and which will continue to be suffered if defamatory statements concerning Plaintiffs remain  
27 posted on the internet.

28 WHEREFORE, Plaintiffs pray for judgment against Defendants as follows:

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On the First Cause of Action for Defamation

1. For economic damages, past and future, according to proof;
2. For non-economic damages, past and future, according to proof; and
3. For punitive damages in an amount appropriate to punish Defendants for their wrongful conduct and to set an example for others.

On the Second Cause of Action for Trade Libel

1. For economic damages, past and future, according to proof.

On the Third Cause of Action

1. For a judicial declaration of wrongdoing by Defendants, stating that Defendants' statements about Plaintiffs, as alleged herein, constitute unlawful defamation;
2. For an injunction ordering that Defendants' defamatory statements concerning Plaintiffs be taken down by Defendants and the internet host providers for such posts; and
3. For an injunction ordering that all active search engines be required to de-index, de-list, and otherwise remove Defendants' defamatory statements concerning Plaintiffs and any related URL addresses referencing those statements from internet searches.

On all Causes of Action

1. For costs of suit herein incurred;
2. For interest in accordance with law; and
3. For such other and further relief as the court deems proper.

BRODERICK SALEEN LAW FIRM



BY: Katrina M. Saleen  
Attorneys for Plaintiffs Md Anis Uzzaman,  
and Fenox Venture Capital, Inc.

## EXHIBIT A

# Ruling on Provisional Disposition by Japanese Court

May 1, 2017  
Tokyo District Court, 9<sup>th</sup> Civil Division  
Judge Toshihiko Okamoto

## 東京地方裁判所による仮処分決定

平成 29 年 5 月 1 日  
東京地方裁判所民事第 9 部  
裁判官 岡本利彦

## 仮処分決定

当事者 別紙当事者目録記載のとおり

上記当事者間の平成29年(㉟)第 1092 号 仮処分  
命令申立事件について、当裁判所は、債権者の申立てを相当と認め、  
債権者に代わり第三者弁護士神田知宏に金10万円  
の担保を立てさせて、次のとおり決定する。

### 主 文

債務者は、債権者に対し、別紙発信者情報目録記載の各情報を仮  
に開示せよ。

平成 29 年 5 月 1 日

東京地方裁判所民事第9部

裁判官 岡本利彦

## 当事者目録

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債権者 エムディー アニス ウッザマン

(MD Anis Uzzaman)

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日本プレスセンタービル6階

小笠原六川国際総合法律事務所 (送達場所)

電話 03-5501-7211 FAX 050-3488-5379

債権者代理人弁護士 神田 知宏

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債務者 株式会社はてな

上記代表者代表取締役 栗栖 義臣

〒108-0074 東京都港区高輪2-16-38-504

泉岳寺前法律事務所 (送達場所)

電話 03-6277-3696 FAX 03-6277-3697

債務者代理人弁護士 落合 洋司

債務者復代理人弁護士 安田 剛

## 発信者情報目録

別紙投稿記事目録記載の各情報にかかる投稿記事を投稿した際の下記情報

- 1 アイ・ピー・アドレス
- 2 前項のアイ・ピー・アドレスを割り当てられた電気通信設備から債務者の用いる特定電気通信設備に投稿記事が送信された年月日及び時刻（時分秒）

(別紙) 投稿記事目録

ブログURL	<a href="http://bshy.hatenadiary.com/">http://bshy.hatenadiary.com/</a>
ブログタイトル	シリコンバレーでの出来事

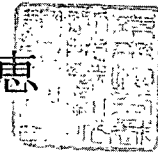
記事URL	<a href="http://bshy.hatenadiary.com/entry/2017/03/11/230514">http://bshy.hatenadiary.com/entry/2017/03/11/230514</a>	
記事タイトル	私、シリコンバレーの VC に抱かれました	
投稿日時	2017年3月11日	
投稿記事	情報1	少し前だけど、日本でも著名なシリコンバレーの VC に抱かれました。 別に付き合ってたわけじゃなく、半分無理矢理です。
	情報2	アシスタントを含め、彼の会社では日本人の女の子が多く働いていて、彼女たちも洗礼を受けているみたいです。ビザの問題もあって、誰にも相談できない。言ったら速攻帰国になるから。

これは正本である。

平成 29 年 5 月 1 日

東京地方裁判所民事第9部

裁判所書記官 柄本友恵







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Tel: +81-92-985-3466 Fax: +81-92-985-3467

翻訳のサムライ 株式会社  
〒814-0002 福岡市早良区西新4丁目8-30-41  
Company registration number: 035598



Samurai Translators K. K. is incorporated under Japanese laws and is a registered translation company.

## Ruling on Provisional Disposition

The parties                      As stated in the appended Inventory of Parties

The court finds that the petition filed by obligee for the 2017 (Yo) No. 1092 Order of Provisional Disposition concerning the case between the above named parties to be reasonable and requires the third party attorney-at-law Tomohiro Kanda to provide security on behalf of the obligee in the amount of 100,000 yen and has ruled as follows.

### Main Text

Obligor shall be required to provisionally disclose to obligee the information entered in the appended Inventory of Sender Information.

May 1, 2017

Tokyo District Court, 9th Civil Division

Judge                      Toshihiko Okamoto



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## Inventory of Parties

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Obligee MD Anis Uzzaman

Nippon Press Center Building 6F, 2-2-1 Uchisaiwai-cho, Chiyoda-ku, Tokyo (100-0011)

Ogasawara Konno & Rokugawa Law Firm (Place of Service)

TEL: 03-5501-7211 FAX: 050-3488-5379

Attorney-at-law representing obligee Tomohiro Kanda

6-5-55 Minamiaoyama, Minato-ku, Tokyo (107-0062)

Obligor Hatena Co., Ltd.

Representative of the above: Representative Director Yoshiomi Kurisu

2-16-38-504 Takanawa, Minato-ku, Tokyo (108-0074)

Sengakuji-mae Law Firm (Place of Service)

TEL: 03-6277-3696 FAX: 03-6277-3697

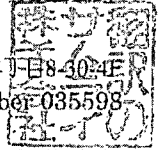
Attorney-at-law representing obligor Yoji Ochiai

Attorney-at-law serving as obligor's subagent Takeshi Yasuda



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Company registration number 035598



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## Inventory of Sender Information

The following information at the time the post containing the information entered in the appended Inventory of Posts was posted.

- 1 IP address
- 2 The date and time (hh:mm:ss) at which the post was transmitted from the telecommunications facility to which the IP address in the preceding paragraph was assigned to the specified telecommunications facility used by obligor.



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 4-8-30-4F Nishijin, Sawara-ku, Fukuoka, Japan 814-0002  
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 Company registration number 095598



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(Appendix) Inventory of Posts

Blog URL	<a href="http://bshy.hatenadiary.com/">http://bshy.hatenadiary.com/</a>
Blog Title	Happenings in Silicon Valley

Post URL	<a href="http://bshy.hatenadiary.com/entry/2017/03/11/230514">http://bshy.hatenadiary.com/entry/2017/03/11/230514</a>	
Post Title	I slept with a Silicon Valley VC	
Date and Time Posted	March 11, 2017	
Post	Information 1	It happened a while ago, but I slept with a Silicon Valley VC who is also a prominent figure in Japan. I wasn't in a relationship with him or anything, and I was forced into it without my full consent.
	Information 2	It seems he has a lot of Japanese women working at his firm, including his personal assistant who he has also had his way with. Because of visa issues, they cannot discuss their stories with anyone as if they speak up, they will be sent back home.



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Samurai Translators K. K. is incorporated under Japanese laws and is a registered translation company.

This is a counterpart.

May 1, 2017

Tokyo District Court, 9th Civil Division

Court Clerk

Tomoe Emoto (seal)



Samurai Translators K. K.  
4-8-30-4F Nishijin, Sawara-ku, Fukuoka, Japan 814-0002  
Tel: +81-92-985-3466 Fax: +81-92-985-3467

翻訳のサムライ 株式会社  
〒814-0002 福岡市早良区西新4丁目8-30-4F  
Company registration number 035598

Samurai Translators K. K. is incorporated under Japanese laws and is a registered translation company.

## Certificate of Translation (Declaration)

I, Shunichi Nagae, President and Chief Translator of the translation company Samurai Translators K. K., do hereby solemnly and sincerely declare;

1. that I am a qualified translator who is proficient in both the English and Japanese languages
2. that the document/s attached is a true and faithful translation from Japanese into English of

Ruling on Provisional Disposition

I make this declaration conscientiously believing it to be true and knowing it is of the same pledge and effect as if made under oath.

Date : May 30 , 2017

Signature : Shunichi Nagae

Shunichi Nagae

President and Chief Translator

Samurai Translators K. K.

<http://www.honyakunosamurai.co.jp>

4-8-30-4F Nishijin, Sawara-ku, Fukuoka-city, Fukuoka,

Japan 814-0002



**Samurai Translators**

<http://www.honyakunosamurai.co.jp>

## EXHIBIT B

# Disclosure of IP Address by Hatena

May 17, 2017

6-5-55-3F Minamiaoyama, Minato-ku, Tokyo (107-0062), Japan

## 「はてな」による発信者情報 IP アドレスの開示

平成 29 年 5 月 17 日

〒107-0062 東京都港区南青山六丁目 5 番 5 5 号

青山サンライトビル 3F

株式会社 は て な

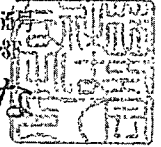
# 回 答 書

平成 29 年 5 月 17 日

エムディー アニス ウツザマン 様 代理人  
弁護士 神田 知宏 様

〒107-0002 東京都港区南青山六丁目5番5号  
青山サンライトビル

株式会社はてな



平成 29 年(三)第 1092 号 発信者情報開示仮処分命令申立事件の決定に沿い、所定記事の投稿に係る投稿時間と IP アドレスを開示いたします。

## 記

対象記事の投稿時間および IP アドレスは下記の通りです。  
ご査収のほどお願い申し上げます。

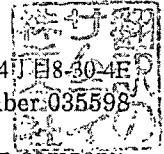
time:11/Mar/2017:23:05:14 +0900  
host:24.130.28.77





Samurai Translators K. K.  
4-8-30-4F Nishijin, Sawara-ku, Fukuoka, Japan 814-0002  
Tel: + 81-92-985-3466 Fax: + 81-92-985-3467

翻訳のサムライ株式会社  
〒814-0002 福岡市早良区西新4丁目8-30-4F  
Company registration number: 035598



Samurai Translators K. K. is incorporated under Japanese laws and is a registered translation company.

---

## Response Letter

May 17, 2017

To Tomohiro Kanda (Attorney-at-law representing Md. Anis Uzzaman)

6-5-55-3F Minamiaoyama, Minato-ku, Tokyo (107-0062)  
Hatena Co., Ltd. (seal)

In accordance with the ruling on the case concerning the petition for the 2017 (Yo) No. 1092 Order of Provisional Disposition for the Disclosure of Sender Information, we are disclosing the time at which the specified post was posted and the IP address used.

The time at which the post in question was posted and the IP address used are as provided below.

Please peruse the information.

time: 11/Mar/2017: 23:05:14 +0900

host: 24. 130. 28. 77



Samurai Translators K. K.  
4-8-30-4F Nishijin, Sawara-ku, Fukuoka, Japan 814-0002  
Tel: +81-92-985-3466 Fax: +81-92-985-3467

翻訳のサムライ株式会社  
〒814-0002 福岡市早良区西新4丁目8-30-4F  
Company registration number 035598

Samurai Translators K. K. is incorporated under Japanese laws and is a registered translation company.

## Certificate of Translation (Declaration)

I, Shunichi Nagae, President and Chief Translator of the translation company Samurai Translators K. K., do hereby solemnly and sincerely declare;

1. that I am a qualified translator who is proficient in both the English and Japanese languages
2. that the document/s attached is a true and faithful translation from Japanese into English of

Response Letter by Hatena Co., Ltd.

I make this declaration conscientiously believing it to be true and knowing it is of the same pledge and effect as if made under oath.

Date : May 31, 2017

Signature : Shunichi Nagae

Shunichi Nagae

President and Chief Translator

Samurai Translators K. K.

<http://www.honyakunosamurai.co.jp>

4-8-30-4F Nishijin, Sawara-ku, Fukuoka-city, Fukuoka,  
Japan 814-0002



**Samurai Translators**

<http://www.honyakunosamurai.co.jp>

## EXHIBIT C

# Disclosure of IP Address Subscriber by Comcast

July 12, 2017

Comcast

Legal Response Center

650 Centerton Road

Moorestown, NJ 08057

## 米国コムキャスト社による IP アドレス所有者情報の開示

2017年7月12日

コムキャスト

リーガルレスポンスセンター

米国ニュージャージー州ムアースタウン市センタートンロード

650番地



Legal Response Center  
650 Centerton Road  
Moorestown, NJ 08057  
866-947-8572 Tel  
866-947-5587 Fax

**CONFIDENTIAL**

July 12, 2017

**VIA UPS**

Mr. Mark Valenti  
Process Server  
5042 Wilshire Boulevard, #507  
Los Angeles, CA 90036

Re: MD Anis Uzzaman; and Fenox Venture Capital, Inc. v. Does 1-20, inclusive  
Superior Court of California, County of San Mateo  
Case No.: 17CIV02443  
Order Entered: 6/5/2017  
Comcast Case #: **846475**

Dear Mr. Valenti:

The Court Order dated 6/5/2017, with respect to the above-referenced matter has been forwarded to the Legal Response Center for a reply. The Court Order requests Comcast to produce certain subscriber records pertaining to the following: 24.130.28.77 assigned on 3/11/2017 at 7:05 AM PST.

Based on the information provided pursuant to the Court Order, the subscriber information obtained has been provided below:

Subscriber Name: BRANDON HILL  
Service Address: 35 WESTMONT DR  
DALY CITY, CA 94015  
Telephone #:  
Type of Service: High Speed Internet Service  
Account Number:  
Account Status: Active  
IP Assignment: Dynamically Assigned  
E-mail User Ids: brandonkhill  
(the above user ID(s) end in @comcast.net)

If you have any questions regarding this matter, please feel free to call 866-947-8572.

Very Truly Yours,

Comcast Legal Response Center