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6 Attorneys for Defendants EngineOwning UG,
Valentin Rick, Leonard Bugla, Leon Frisch,
7 Marc-Alexander Richts, Alexander Kleeman,
Leon Schlender, Bennet Huch, Pascal Classen,
and Remo Loffler
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10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**
12

13 ACTIVISION PUBLISHING, INC., a
Delaware corporation,

14 Plaintiffs,

15 vs.

16 ENGINEOWNING UG, a German
17 corporation, CMM HOLDINGS S.A., a
German corporation, GARNATZ
18 ENTERPRISE LTD., a Belize
corporation, VALENTIN RICK, an
19 individual, LEONA RD BUGLA, an
individual, LEON FRISCH, an
20 individual, IGNACIO
GAYDUCHENKO, an individual,
21 MARC-ALEXANDER RICHTS, an
individual, ALEXANDER KLEEMAN,
22 an individual, LEON SCHLENDER, an
individual, ERICK PFEIFER, an
23 individual, BENNET HUCH, an
individual, ZAIN JONDAH, an
24 individual, RICKY SZAMEITAT, an
individual, MARCEL BINDEMANN,
25 an individual, REMO LOFFLER, an
individual, MARVIN BAOTIC
26 NEUMEYER, an individual,
HENDRIK SMAAL, an individual,
27 CHARLIE WIEST, an individual,
DENNIS REISSLEICH, an individual,
28 TYLER BYRD, an individual, SIMON

CASE NO. 2:22-CV-00051-MWF

**DECLARATION OF BRIANNA
LOGAN**

Judge: Hon. Michael W. Fitzgerald
Dept.: 5A

1 MASIAS, an individual, NICHOLAS
2 JAMES BALDWIN, an individual,
3 ANTONIO MEDIAN, an individual,
4 REMY CARTIGNY, an individual,
5 PASCAL CLASSEN, an individual,
6 MANUEL T. SANTIAGO, an
7 individual, and KATERINA DISDLE,
8 an individual, and DOES 1-50,
9 inclusive,

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Defendants.

DECLARATION OF BRIANNA LOGAN

I, Brianna Logan, declare as follows:

1. I was the attorney for Defendants Valentin Rick, Alex Kleeman, Bennet Huch, Leon Frisch, Leon Schlender, Leonard Bugla, Marc-Alexander Richts, Pascal Claßen, Remo Löffler, and EngineOwning UG (collectively, the “Foreign Defendants”) in the case *Activision Publishing, Inc. v. EngineOwning UG*, 2:22-CV-00051-MWF, currently pending in the United States District Court for the Central District of California.

2. The following facts are based on my own personal knowledge. I am over 18 years of age. If called as a witness, I would and could competently testify to such facts under oath.

3. I am an associate attorney and employee of Elliot Gipson PC.

4. On May 23, 2023, the Court granted Elliot Gipson PC, Elliot Gipson, and my (“the Firm”) Motion to Withdraw as Counsel of Record for the Foreign Defendants. (“Order”, Dkt. No. 111).

5. Throughout the course of this litigation, the Firm consistently conducted communications with each of the Foreign Defendants via email or text messages.

6. On May 24, 2023, I sent a copy of the Order via email to each of the Foreign Defendants, using their individual email addresses. In this email, I informed each of the Foreign Defendants that they must either (1) have newly retained counsel file a notice of appearance in this action, or (2) file a status report informing the Court of their intention to proceed *pro se* by June 26, 2023. Upon sending such emails, I did not receive any bounce-back emails or any other indication that such emails were not received.

7. On May 24, 2023, I received an email response to the aforementioned email, from Defendant Leonard Bugla, which stated that he consented to service via email. I did not hear back from any other individual defendant.

1 8. On information and belief, Markus Kompa is the attorney for Foreign
2 Defendants EngineOwning UG and Valentin Rick, in Germany. On information and
3 belief, Mr. Kompa represents Foreign Defendants EngineOwning UG and Valentin
4 Rick in a related German litigation involving an Activision-related plaintiff.

5 9. On May 24, 2023, I sent a copy of the Order via email to Markus
6 Kompa. In this email, I informed him that each of the Foreign Defendants must either
7 (1) have newly retained counsel file a notice of appearance in this action, or (2) file
8 a status report informing the Court of their intention to proceed *pro se* by June 26,
9 2023. I also informed him that because EngineOwning UG is a corporate defendant,
10 it cannot appear *pro se*, and that its failure to have new counsel file a timely notice
11 of appearance, by no later than June 26, 2023, will, at Plaintiff's request, result in
12 entry of default against Defendant EngineOwning UG on the First Amended
13 Complaint. Markus Kompa confirmed receipt of this email on May 24, 2023.

14 10. On May 26, 2023, I mailed a physical copy of the Order via DHL's
15 international shipping service to EngineOwning UG, at the following address: Saazer
16 Str. 13, Pfaffenhofen, 85276 Germany. I also mailed a physical copy of the Order to
17 Markus Kompa at the following address: Geisselstrasse 11, Cologne, 50823
18 Germany. With each of these copies, I included a letter providing notice that each of
19 the Foreign Defendants must either (1) have newly retained counsel file a notice of
20 appearance in this action, or (2) file a status report informing the Court of their
21 intention to proceed *pro se* by June 26, 2023, and that EngineOwning UG cannot
22 appear *pro se*. Copies of these letters are attached hereto as **Exhibit A**.

23 11. I have previously mailed Mr. Kompa and Defendant EngineOwning
24 UG at the same addresses. I never received any indication that such mail was not
25 received.

26 I declare under penalty of perjury under the laws of the United States of
27 America and the State of California that the foregoing is true and correct. Executed
28 on May 30, 2023 in Los Angeles, California.

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By /s/ Brianna Logan
Brianna Logan

Attorney for Defendants EngineOwning UG,
Valentin Rick, Leonard Bugla, Leon Frisch,
Marc-Alexander Richts, Alexander
Kleman, Leon Schlender, Bennet Huch,
Pascal Classen, and Remo Loffler

Exhibit A

ELLIOT GIPSON PC

15260 VENTURA BOULEVARD, SUITE 835
SHERMAN OAKS, CALIFORNIA 91403
WWW.ELLIOTGIPSON.COM

May 26, 2023

VIA MAIL

EngineOwning Software UG
Saazer Str. 13
85276 Pfaffenhofen
Germany
+49 8441 4792663
contact@engineowning.software

RE: *Activision Publishing, Inc. v. EngineOwning UG, et al.*, Case No. 2:22-CV-00051

To EngineOwning UG, Valentin Rick, Leonard Bugla, Leon Frisch, Marc-Alexander Richts, Alexander Kleeman, Leon Schlender, Bennet Huch, Pascal Classen, and Remo Loffler:

Attached to this letter, please find enclosed the Court's Order granting Elliot Gipson PC, Elliot Gipson, and Brianna Logan's Motion to Withdraw as Counsel of Record in the above-referenced matter. This Order was issued on May 23, 2023.

Please be advised that because we have withdrawn, each of you must take immediate action to find new counsel or inform the court that you will be appearing *pro se*. By no later than **June 26, 2023**, each Defendant that is a natural person shall either (1) have newly retained counsel file a notice of appearance in this action, or (2) file a status report informing the Court of his or her intention to proceed *pro se*. If any Defendant fails to inform the Court of his retention of counsel or intent to appear *pro se* by the deadlines, the Court will issue an Order to Show Cause why default shall not be entered against the non-responding Defendant(s).

For EngineOwning UG specifically, because it is a corporate defendant, **it cannot appear pro se**. Be advised that EngineOwning UG must retain new counsel. Its failure to have new counsel file a timely notice of appearance, by no later than **June 26, 2023**, will, at Plaintiff's request, result in entry of default against Defendant EngineOwning UG on the First Amended Complaint.

Lastly, the Court has extended your deadline to file an answer to Plaintiff's First Amended Complaint to **July 17, 2023**.

Best Regards,

Brianna Logan

Brianna Logan

ELLIOT GIPSON PC

15260 VENTURA BOULEVARD, SUITE 835
SHERMAN OAKS, CALIFORNIA 91403
WWW.ELLIOTGIPSON.COM

May 26, 2023

VIA MAIL

Markus Kompa
Geisselstrasse 11
Cologne, 50823
Germany
Tel.: 0221 / 2996000-1
info@kanzleikompa.de

RE: *Activision Publishing, Inc. v. EngineOwning UG, et al.*, Case No. 2:22-CV-00051

To Markus Kompa:

This letter is regarding Defendants EngineOwning UG, Valentin Rick, Leonard Bugla, Leon Frisch, Marc-Alexander Richts, Alexander Kleeman, Leon Schlender, Bennet Huch, Pascal Classen, and Remo Loffler, in the matter *Activision Publishing, Inc. v. EngineOwning UG, et al.*, Case No. 2:22-CV-00051, in the United States District Court for the Central District of California.

Attached to this letter, please find enclosed the Court's Order granting Elliot Gipson PC, Elliot Gipson, and Brianna Logan's Motion to Withdraw as Counsel of Record in the above-referenced matter. This Order was issued on May 23, 2023.

Please be advised that because we have withdrawn, each of the Defendants must take immediate action to find new counsel or inform the court that they will be appearing *pro se*. By no later than **June 26, 2023**, each Defendant that is a natural person shall either (1) have newly retained counsel file a notice of appearance in this action, or (2) file a status report informing the Court of his or her intention to proceed *pro se*. If any Defendant fails to inform the Court of his retention of counsel or intent to appear *pro se* by the deadlines, the Court will issue an Order to Show Cause why default shall not be entered against the non-responding Defendant(s).

For EngineOwning UG specifically, because it is a corporate defendant, **it cannot appear pro se**. Be advised that EngineOwning UG must retain new counsel. Its failure to have new counsel file a timely notice of appearance, by no later than **June 26, 2023**, will, at Plaintiff's request, result in entry of default against Defendant EngineOwning UG on the First Amended Complaint.

Lastly, the Court has extended the Defendants' deadline to file an answer to Plaintiff's First Amended Complaint to **July 17, 2023**.

Best Regards,

Brianna Logan