

1 Pro Per
OsiruSoft Research & Engineering
2 517 N. Emerald
Orange, CA
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4 Superior Court of the state of California

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6 Pallorium, In., A Texas Corporation,) Case No.: No. 03CC12794
)
7 Plaintiff,) Response to First Interrogatories
)
8 vs.)
)
9 Stephen J. Jared, AKA Joe Jared,)
)
10 individually, and DBA Osirusoft)
)
11 Research and Engineering,)
)
12 Defendant)
)

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17 Dated this 25th day of April, 2004

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OsiruSoft Research &
Engineering
20 517 N. Emerald
Orange, CA
21 Pro Per
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- 1) I was not notified, nor do I have any records to indicate that peoplefinder.net was a problem, nor do I have any reference to relays.osirusoft.com's last zone file. Perhaps if an actual IP address was given, I could provide more information. I have asked for this information on several occasions.
- 2) No internal document suggested any reference to peoplefinder.net. Perhaps if I had an IP address, as requested verbally, I could work with such information to help answer your question.
- 3) There was no such assertion, nor was there any reference to peoplefinder.net in any internal document.
- 4) My filtering system for mail I use works with IP addresses, not domains. There are occasional references to domains, but no such reference exists. Are you sure peoplefinder.net was ever in my local filters?
- 5) I have no information about Pallorium's disclosed domains. My filters are IP address based. Perhaps if you could provide an IP address I might be able to find information about it.
- 6) Again, I have no information about pallorium's domains.
- 7) Again, I have no information about pallorium's domains.
- 8) Again, I have no information about pallorium's domains.
- 9) I don't believe the question has relevance, due to the fact that I see no information that shows your network was listed. If spam originated from a network, the originating IP or a cidr mask of such IP was added to my filters. <http://www.spews.org>, <http://www.spamhaus.org>, <http://spamsites.org>, <http://www.spambusters.com.ar> and others have documented procedures. The problem with your question is that I am not sure if the listing you are referring to relates to my personal list or that of a list imported from another site.
- 10) Under normal circumstances, I simply corrected the error.

1 11) If a listing was either automatically added or manually added, and was
2 inaccurate, I simply removed the entry. If it was a remote list that was
3 imported into my zone file, I suggested to the import zone that there was
4 a problem.

5 12) Anyone who could successfully access <http://relays.osirusoft.com>

6 13) March, 2003, and much of June 2003 to the present.

7 14) See 13

8 15) An individual from foonet.net created a Trojan that was designed to
9 attack my site and others, as can be confirmed by Special Agent E.J.
10 Hilbert of the FBI.

11 16) Much of the news media, and in particular, Special agent E.J. Hilbert
12 of the FBI, 714-542-8825.

13 [http://search.yahoo.com/search?p=%2Bosirusoft+%2Bdos&ei=UTF-8&fr=fp-tab-
14 web-t&cop=mss&tab=](http://search.yahoo.com/search?p=%2Bosirusoft+%2Bdos&ei=UTF-8&fr=fp-tab-web-t&cop=mss&tab=) might indicate that plaintiff and plaintiff's attorney

15 were on another planet when it happened.

16 17) Yes

17 18) See 13

18 19) See 13

19 20) Yes

20 21) See 13

21 22) See 13

22 23) Anyone who called me knew. Such knowledge didn't stop you from suing
23 me, did it?

24 24) The hyperlinks were not necessary to monitor. At best, they only
25 generated email, which could not be accessed anyway.

26 25) See 13

27 26) See 15

28 27) What do you mean by separate? I had mirrors on other sites, but they
29 were not operational during the same time as relays.osirusoft.com was not

1 operational, because Osirusoft's Parent DNS servers were ddos'd. This is
2 how the ddos attack was designed, to destroy Osirusoft's network.

3 28) See 13

4 29) Many people harassed me by voice over listings not entered by me. What
5 may be confusing to understand, is that other than open relays, the only
6 list maintained was that of a personal list, which Had no reference to the
7 plaintiff and was roughly 5% of the size of the other import zones.

8 30) See 13

9 31) Such information is unavailable, as I no longer have that data.

10 32) I built relays.osirusoft.com to complement my own personal use of my
11 mail servers, so that I could personally filter incoming unsolicited email
12 AKA "spam". Others simply accessed the same data I did, or downloaded the
13 zone file and used local servers to reduce the load from my site's already
14 overloaded system.

15 33) Said phone call was well over a year ago and due to extenuating
16 circumstances both in my business and with the ddos attack, I'm pretty
17 sure I didn't have patience for either of you. I believe you demanded
18 that I remove your company's alleged listing, to which I replied that I
19 could not access my system, due to a dos attack. At this point, you said
20 you were going to sue me, so I saw no point in continuing the
21 conversation. At the point prior to hanging up, I may have said, "See you
22 in court". I doubt much more was said, simply because I wouldn't have
23 wasted more than a minute on such a threatening call, as these calls are
24 common, especially from spammers.

25 34) I designed my system to take input data from text files either locally
generated or downloaded from other sites, and from my open relay database
to provide answers via DNS for a given IP A.B.C.D

If D.C.B.A.relays.osirusoft.com or other subzones returned a 127.0.0.X

1 value, my own mail servers would reject email from that site.

2 I do not know what others were doing with the data, but assume others used
3 it for similar purposes, or simply to flag email as potential Spam. At no
4 time did I grant permission nor deny access to the data from my name
5 servers, and at no time was anyone charged for access to my servers, nor
6 was there any business relationship with said individuals and companies.
7 Relays.osirusoft.com was a hobby well before the existence of Osirusoft
8 Research & Engineering and is actually a completely separate non-entity.
9 At one time, <http://www.osirusoft.com> (<http://68.167.168.130/osirusoft>)
10 had mention of relays.osirusoft.com but only to redirect individuals to
11 the correct site.
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