



Legal Document

District Of Columbia District Court

Case No. 1:23-cv-01816-BAH

**GREENSPAN v. EXECUTIVE OFFICE FOR U.S.
ATTORNEYS et al**

Document 105



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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

AARON GREENSPAN,

Plaintiff,

v.

EXECUTIVE OFFICE FOR U.S.
ATTORNEYS, et al,

Defendants.

Case No. 1:23-cv-01816-BAH

**PLAINTIFF’S MOTION FOR LEAVE TO SERVE LIMITED DISCOVERY ON
INTERVENOR CONCERNING DENIAL-OF-SERVICE ATTACKS ON PLAINTIFF’S
WEBSITE, AND MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT**

Plaintiff Aaron Greenspan respectfully moves under Federal Rule of Civil Procedure 26(d)(1) and this Court’s inherent authority for leave to serve six interrogatories, four requests for admission, and one request for production on Intervenor Bola A. Tinubu (“Intervenor”), in the form attached as Exhibit A, and to serve a subpoena for documents under Rule 45 on DCI Group AZ, L.L.C. and/or its parent company (“DCI Group”), a registered agent of the Government of Nigeria, in the form attached as Exhibit B. The requests concern distributed denial-of-service (“DDoS”) attacks on www.plainsite.org, the PlainSite website through which Plaintiff earns his personal income and has published the record of this litigation and resulting document production. DDoS attacks have tracked the docket of this case for more than two years and at least for now, stopped at the end of August 2026. Plaintiff does not know who is responsible. The purpose of this motion is to find out whether Intervenor does.

Pursuant to Local Civil Rule 7(m), Plaintiff conferred with counsel for Intervenor and counsel for Defendants by e-mail on July 3, 2026. Counsel for Intervenor responded “that would not be proper in a FOIA action, is not related to the issue in the case, and discovery is not a tool of personal investigation, so I must decline your suggestion.” Defendants did not respond.

I. INTRODUCTION

Since April 2025, PlainSite has been subjected to repeated, large-scale DDoS attacks. At their peak, Plaintiff's hosting provider's mitigation system recorded roughly one gigabit per second and 1.8 million packets per second of hostile traffic, dropped from more than 110,000 source hosts simultaneously distributed across the globe. Declaration of Aaron Greenspan in Support of Motion for Limited Discovery ("Greenspan Disc. Decl.") ¶ 6 & Exhibit B. The attacks have cost Plaintiff mitigation services, engineering time, money, and, on the days they succeeded, the ability to use his own site, which he uses to prepare filings in this case.

These attacks are not ordinary internet background noise. While PlainSite has come under attack at various points in the past, such attacks are typically low-intensity and leave a signature that makes attribution relatively straightforward. In contrast, these attacks have been of such a high intensity that they at one point physically overwhelmed PlainSite's service provider's network switch and were not immediately attributable. They began three days after this Court's April 8, 2025 order granting Plaintiff partial summary judgment and directing production. They have recurred within days of nearly every significant docket event since. In August 2026 the heaviest attack of the month ran from August 6 through 9, the four days before Plaintiff's reply was originally due under the June 23, 2026 scheduling order; the attacks spiked again on August 21—the date on which Defendants' cross-motion was then due—and on August 28 through 30, the day Intervenor and Defendants ultimately filed and the two days after, when Plaintiff would have begun his reply. Then, at the end of August, after more than two years, the acute attacks stopped. Greenspan Disc. Decl. ¶¶ 5, 9-12.

Plaintiff does not ask the Court to find that Intervenor is responsible, and does not allege that he is. Plaintiff asks for leave to put a small number of questions to the one party to this case who has publicly acknowledged spending millions of dollars on American consultants to manage the reputational consequences of the records at issue, and whose filings the attacks have so closely followed. If the answers are "no," the matter is closed at the cost of a few pages. If they are not, the Court should know.

II. FACTUAL BACKGROUND

A. The Attacks

Plaintiff is responsible for the daily operations of PlainSite, a legal and financial information service that hosts, among other things, the public docket of this case. Greenspan Disc. Decl. ¶¶ 1-3. Beginning in April 2025, PlainSite's server began receiving floods of traffic designed to, and which at times did, exhaust its capacity. *Id.* ¶ 5. On May 29, 2025, during a sustained attack, a NETSCOUT Arbor DDoS mitigation appliance operated by PlainSite's data center recorded total traffic of approximately 1.0 Gbps and 1.8 million packets per second directed at a single IP address, of which it dropped roughly half, blocking 110,700 source hosts. *Id.* ¶ 6 & Exhibit B. Ultimately, the NETSCOUT Arbor device was ineffective at preventing downtime. In addition to requiring Plaintiff to make use of a dedicated DDoS mitigation service from PlainSite's provider, *id.* ¶ 6, the attacks required Plaintiff to begin using a content distribution network that had negative effects on PlainSite, and to later build his own adaptive firewall software, which by the summer of 2026 was banning thousands of source networks per hour, *id.* ¶¶ 8, 23 & Exhibit D. Packet captures taken during the attacks show traffic from thousands of unrelated addresses worldwide, consistent with the Aisuru-Kimwolf botnet rather than any single actor's own infrastructure. *Id.* ¶ 7 & Exhibit C; *see id.* ¶¶ 15-17 & Exhibits A, E (Cloudflare's description of the Aisuru-Kimwolf botnet, and the Lampshade Server Adaptive Firewall report showing the blocked ranges to be concentrated in Brazil, Vietnam, India, Mexico, Turkey, and also Saudi Arabia). For an attacker, that is the point of renting a botnet: the attack is relayed through compromised consumer devices in dozens of countries (in this case, it would appear to be Android-based television set-top boxes) so that it appears to come from everywhere and nowhere at once, while the party who commissioned the attack never sends a packet from a network that can be traced to them. *Id.* ¶ 17. The geographic spread of the traffic thus identifies the tool, not the hand that paid for it, and that is exactly why the identity of the responsible party can be established only through discovery.

B. The Attacks Track This Docket

Plaintiff has preserved dated records—screenshots, provider tickets, mitigation reports, packet captures, and traffic graphs—of the attacks as they occurred. Greenspan Disc. Decl. ¶ 5. Set against the docket of this case, they show the following pattern, which is summarized in the table at paragraph 11 of the contemporaneously filed Declaration of Aaron Greenspan:

- Sustained attacks Plaintiff recorded occurred on April 11, 2025, three days after this Court entered its Order and Memorandum Opinion granting Plaintiff partial summary judgment and directing Defendants to process and produce records. ECF Nos. 47-48. They continued on at least eleven further dates through April 27, 2025.
- Another sustained campaign ran from May 27 through June 9, 2025, and required the mitigation described above.
- Attacks recurred on December 19, 20, and 22, 2025, within five days of Defendants’ December 17, 2025 substitution of counsel, ECF No. 63; on February 15, 2026, two days after Defendants’ February 13, 2026 status report, ECF No. 65; and on June 5, 6, 12, 15, and 21, 2026, in the period bracketed by the parties’ June 5 and June 18 joint status reports, the Court’s June 8 and June 23 orders, and Plaintiff’s June 25, 2026 motion for summary judgment. ECF Nos. 79-85.
- Throughout the summer of 2026 the server was under sustained attack, but especially in August. From August 4 through August 30, Plaintiff’s adaptive firewall dropped as hostile approximately 71 million packets per day—53 percent of all traffic—and the heaviest episode, from August 6 through 9, drove the server load average above 100 for hours at a time and to a peak of 504. Greenspan Disc. Decl. ¶ 9 & Exhibit F. *That surge began the day after an account operated by a registered foreign agent of the Nigerian government published a post attacking Plaintiff personally, in reply to a post about this case.* *Id.* ¶ 19 & Exhibit I. That episode does not coincide with a filing, but it does coincide with a deadline: under the Court’s June 23, 2026 scheduling order, Plaintiff’s reply and opposition were

due August 10, 2026, and the four days of heaviest attack were the four days before it. Defendants' extensions had by then moved the schedule; an attacker working from instructions based upon the original order may not have known that.

- On August 21, 2026, the site experienced a sharp spike in hostile traffic: the load average rose to 302 shortly after noon and 325 at about 5:00 P.M., against daily maxima of 26 to 95 on the surrounding days. Greenspan Disc. Decl. ¶ 9 & Exhibit F. *August 21 was, until the afternoon of August 20, the deadline for Defendants' cross-motion and opposition, set by the Court's August 14, 2026 Minute Order.* Defendants moved on August 19 for seven more days until August 28, ECF No. 94; Plaintiff opposed on August 20, ECF No. 95; the Court granted the extension on August 20.
- *On August 28, 2026, the day Intervenor filed his opposition (ECF No. 98) and Defendants filed their cross-motion (ECF Nos. 99-101), hostile traffic spiked again*, reaching approximately 600,000 packets per minute on August 29 and driving the server's load average to roughly 300 on August 30, remaining above 300 for most of the nineteen hours that followed. Greenspan Disc. Decl. ¶¶ 9-10 & Exhibits D, F.
- Since August 31, 2026, the acute attacks have stopped. Dropped traffic fell by roughly 70%, the load average has not exceeded 32 on any day, and the population of banned addresses has decayed from about 700,000 to under 70,000 as attacking hosts failed to return and the firewall adapted. *Id.* ¶¶ 9, 12 & Exhibit F.

Plaintiff recognizes that the docket is public and that anyone who follows it could time an attack to a filing. Correlation is not attribution, and Plaintiff does not present it as such. But a pattern that begins with the Court's first merits ruling, recurs on the parties' deadlines, concentrates on the days Plaintiff would be preparing his own filings rather than on Defendants' reply deadline, peaks when the opposing parties file, and then ends, is not noise. It is the

behavior of someone who is A) watching this case closely and B) has a strong incentive to prevent public access to case and case-related materials.

C. Intervenor’s Reported Expenditures on American Influence Efforts

Intervenor is not an ordinary third party. He is the sitting President of Nigeria, who intervened in this action to prevent disclosure of the records at issue. Public reporting indicates that beginning in April 2024, contracts totaling over \$6 million were entered with American lobbying and reputation-management firms, signed in the name of the Government of Nigeria, for the purpose of countering coverage of the drug-trafficking allegations that are the subject of the records at issue here. Greenspan Disc. Decl. ¶ 18 & Exhibit G (*Peoples Gazette*, Jan. 6, 2025). On September 2, 2026, a Washington lobbying firm (which has now filed a *pro se* motion for leave to file an amicus brief in this action, *see* ECF Nos. 102-103) retained by Intervenor’s principal political opponent to campaign for release of the same records reported that it had been offered \$3 million, “a few days” earlier, to abandon that campaign, and stated that it was referring the offer to the Department of Justice and the FBI. *Id.* ¶ 18 & Exhibit H (*Peoples Gazette*, Sept. 2, 2026). Plaintiff cannot vouch for these reports and cites them for a limited purpose: they echo other reports from Nigerian media that substantial resources have been devoted, on Intervenor’s behalf, to influencing how these records are perceived in Nigeria and in the United States, and that the people directing those resources are aware of efforts, including this one, to bring the records to light. Whether any of those resources were directed at shutting down PlainSite—which would be a federal crime in violation of the Computer Fraud and Abuse Act, 18 U.S.C. § 1030—is what the proposed discovery asks.

One of those resources is a matter of public record rather than press report. On December 18, 2025, DCI Group AZ, L.L.C., a Washington public affairs firm, registered under the Foreign Agents Registration Act as an agent of the “Republic of Nigeria through Aster Legal,”¹ disclosing that its work is directed by Nigeria’s National Security Advisor, that its engagement extends to countering “other destabilizing elements,” and that it had received a \$4.5

¹ Plaintiff believes “Aster Legal” to be a law firm based in Nigeria working on the Nigerian government’s behalf.

million six-month retainer pre-payment from the Republic of Nigeria on December 12, 2025, under a contract providing for \$750,000 per month. Greenspan Disc. Decl. ¶ 19 & Exhibit J. On August 5, 2026, a Twitter/X account that discloses on its face that it “is managed by DCI Group AZ, L.L.C., on behalf of the Republic of Nigeria” published a post about Plaintiff—in reply to a post about the court-ordered release of the records at issue here—describing him as one of “a long line of comedic characters that have aligned with the opposition seeking to oust President Tinubu” and asking “why is anyone listening to Greenspan and his ramblings?” *Id.* ¶ 19 & Exhibit I. The heaviest DDoS attack of August began the next day. *Id.* ¶ 9(b). Plaintiff does not at this point contend that DCI Group had any role in the attacks. The post establishes something narrower and undisputed: that in August 2026, a firm paid \$750,000 a month by Intervenor’s government, and reporting to his National Security Advisor, was monitoring this case and publishing attacks on Plaintiff personally. Whether that firm, or any other, was asked to do more is a question only Intervenor can answer.

III. ARGUMENT

A. The Court Has Authority to Permit Limited Discovery Directed at Interference With a Party’s Ability to Litigate

Federal Rule of Civil Procedure 26(d)(1) permits discovery before the parties’ Rule 26(f) conference “when authorized . . . by court order.” Fed. R. Civ. P. 26(d)(1). Courts in this District evaluate requests for such discovery under a reasonableness standard, asking whether the request is reasonable in light of all the circumstances, including the breadth of the requests, the purpose for which they are sought, and the burden on the responding party. *Guttenberg v. Emery*, 26 F. Supp. 3d 88, 97-98 (D.D.C. 2014); *Landwehr v. FDIC*, 282 F.R.D. 1, 3-4 (D.D.C. 2010). Independently, a federal court possesses inherent authority to protect the integrity of its own proceedings and the ability of the parties before it to litigate them. *Chambers v. NASCO, Inc.*, 501 U.S. 32, 43-46 (1991). Conduct that interferes with a party’s ability to prepare and file papers is within that authority whether or not it also gives rise to a separate claim.

Plaintiff is aware that discovery is uncommon in FOIA litigation, where the question is ordinarily whether an agency’s search and withholdings are adequate and the agency’s

declarations supply the record. This motion does not seek discovery on that question, from the agencies, or into their processing of Plaintiff's requests. It seeks discovery from a private party who chose to intervene, about conduct directed at Plaintiff's ability to participate in the case he brought. The FOIA-specific reasons for limiting discovery have no application to that subject.

B. The Requested Discovery Is Narrow, Proportional, and Reasonable

The proposed requests to Intervenor (Exhibit A) consist of six interrogatories, four requests for admission, and a single request for documents. They ask, in substance, three things: whether Intervenor, or anyone acting on his behalf or at his direction—including the Government of Nigeria, its agencies, and any consultant, lobbyist, public-relations, security, or investigative firm retained in connection with this action or with Plaintiff—directed, requested, funded, or was informed of any attack on plainsite.org; the identity of the firms retained in connection with this action or with Plaintiff, and the engagement terms with them; and whether Intervenor or his counsel has any knowledge of who is responsible. They are confined to the period since the filing of this action. They can be answered in a few pages. They require no deposition and no adjustment of the summary judgment schedule, which is fully briefed.

The burden on Intervenor is minimal. He is represented by counsel, he is a party who invoked this Court's jurisdiction to protect his own interests, and the information sought is uniquely within his knowledge. If the answers are that he knows nothing, the requests will have cost him an afternoon or less. By contrast, Plaintiff has no other means of obtaining this information: the attacks come from millions of "rented"² IP addresses that reveal nothing about who is paying for them.

C. The Court Should Also Permit a Narrow Document Subpoena to DCI Group

Plaintiff also seeks leave to serve a single document subpoena on DCI Group, in the form attached as Exhibit B. Rule 26(d)(1) governs discovery "from any source," and a Rule 45 subpoena is the mechanism for obtaining documents from a nonparty. Fed. R. Civ. P. 26(d)(1), 45(a)(1)(A)(iii). DCI Group is the only entity the record identifies as having acted against

² Here, the word "rented" is a euphemism since what is being rented is the aggregate capacity offered by unlawfully compromised electronic devices, unbeknownst to their owners.

Plaintiff. It is a United States-based entity paid \$750,000 a month by Intervenor's government; it reports to Intervenor's National Security Advisor; and on August 5, 2026, under its own Foreign Agents Registration Act disclosure, it published a post attacking Plaintiff in reply to a post about this case. Greenspan Disc. Decl. ¶ 19 & Exhibits I, J. Its contract requires it to deliver monthly reports describing the "advocacy activities undertaken" and provides for written Work Orders. *Id.* Exhibit J (Client Services Agreement §§ 1-2). Those documents will show, one way or the other, whether Plaintiff or PlainSite was a subject of the engagement, and they are in the files of an American firm within this Court's subpoena power, not in Intervenor's.

The subpoena is confined to documents dated on or after December 12, 2025, the effective date of DCI Group's engagement, that refer to Plaintiff, PlainSite, plainsite.org, or this action, and to communications concerning DDoS traffic directed at PlainSite. It does not seek DCI Group's communications with Congress or the Executive Branch, its work on any other subject, or its finances beyond what it has already disclosed to the Department of Justice. It asks what a paid foreign agent did about a private litigant, not what it said to the government, and so burdens no protected petitioning activity. The firm's own contract anticipates production under court order. *Id.* Exhibit J (Client Services Agreement § 8). The party discovery and the subpoena are independent, and Plaintiff asks the Court to grant either whether or not it grants the other. But party discovery alone would permit Intervenor to answer, truthfully, that he personally did nothing, while the firm actually engaged on his government's behalf is never asked.

D. Intervenor Chose to Become a Party, and a Party Is Subject to the Rules

Intervenor sought and obtained leave to participate in this case as a party. November 27, 2023 Minute Order (granting ECF No. 18). A party may be served with interrogatories, requests for admission, and requests for production. Fed. R. Civ. P. 33(a)(1), 34(a), 36(a)(1). Intervenor cannot invoke the Court's process to oppose disclosure while insulating himself from three questions about whether he is interfering with the party seeking it. Nor does his status as a foreign head of state alter the analysis: he appears here voluntarily, through counsel, and the requests are directed to him in that capacity.

E. The Court Should Act Now

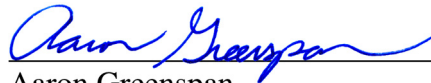
The attacks stopped when the briefing closed. If they resume with the Court's decision, Plaintiff will be litigating any further proceedings, including any appeal, while under continued attack. The modest discovery requested here is the least intrusive way to determine whether a party to this case is responsible, and it is better answered while the case is pending than after it has ended.

IV. CONCLUSION

Plaintiff respectfully requests that the Court grant leave to serve the proposed discovery attached as Exhibit A on Intervenor and the proposed document subpoena attachment attached as Exhibit B on DCI Group AZ, L.L.C., and order Intervenor to respond within twenty-one (21) days of service. A proposed order is submitted herewith.

Dated: September 9, 2026

Respectfully submitted,



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EXHIBIT A

**PLAINTIFF'S PROPOSED FIRST SET OF INTERROGATORIES, REQUESTS FOR
ADMISSION, AND REQUEST FOR PRODUCTION TO INTERVENOR BOLA A.
TINUBU**

DEFINITIONS

“Attack” means any denial-of-service, distributed denial-of-service, or other deliberate effort to disrupt, degrade, or overload the servers or services of PlainSite (<https://www.plainsite.org>) or any other website or server operated by Plaintiff, at any time since June 23, 2023.

“Retained Firm” means any lobbying, public-relations, reputation-management, consulting, legal, investigative, security, or information-technology firm or individual retained, engaged, or paid by You, by the Government of Nigeria or any of its agencies or officials, or by any person acting on Your behalf, in connection with this action, with the records that are the subject of this action, or with Plaintiff or plainsite.org.

“You” and “Your” mean Intervenor Bola A. Tinubu and any person acting on his behalf or at his direction, including his counsel in this action.

INTERROGATORIES

Interrogatory No. 1. Have You, or has any person acting on Your behalf or at Your direction, including any Retained Firm, at any time directed, requested, authorized, funded, paid for, or facilitated any Attack? If so, identify each such person, the dates, and the nature of the conduct.

Interrogatory No. 2. Have You, or has any person acting on Your behalf, including Your counsel in this action, at any time received information indicating who is responsible for any Attack, or indicating that any Attack was planned or was occurring? If so, identify the source, date, and substance of that information.

Interrogatory No. 3. Identify each Retained Firm, the date of its engagement, the person or entity that engaged and paid it, and the scope of its engagement insofar as it concerns this action, the records that are the subject of this action, Plaintiff, or plainsite.org.

Interrogatory No. 4. Identify every person who, since June 23, 2023, has communicated with You or Your counsel concerning plainsite.org or Plaintiff (other than communications between You and Your counsel, and filings in this action), and state the date and substance of each communication.

Interrogatory No. 5. Identify every communication since December 12, 2025 between You, Your counsel in this action, or any official or agency of the Government of Nigeria, on the one hand, and DCI Group AZ, L.L.C. or Aster Legal, on the other, that refers to Plaintiff, plainsite.org, this action, or the records that are the subject of this action, stating for each the date, the participants, and the substance; and state whether You or any such official directed, requested, or approved the post about Plaintiff published on August 5, 2026 by the X account @SecureNigeriaHQ.

Interrogatory No. 6. If Your response to any Request for Admission below is other than an unqualified admission, state every fact on which the denial or qualification is based.

REQUESTS FOR ADMISSION

Request for Admission No. 1. Admit that neither You nor any person acting on Your behalf or at Your direction has directed, requested, authorized, funded, paid for, or facilitated any Attack.

Request for Admission No. 2. Admit that no Retained Firm has, to Your knowledge, directed, requested, authorized, funded, paid for, or facilitated any Attack.

Request for Admission No. 3. Admit that You have no information indicating who is responsible for any Attack.

Request for Admission No. 4. Admit that a Retained Firm has been engaged in connection with this action or with the records that are the subject of this action.

REQUEST FOR PRODUCTION

Request for Production No. 1. Documents sufficient to show the identity, engagement date, engaging party, and scope of work of each Retained Firm identified in response to Interrogatory No. 3, and all documents constituting or reflecting any communication described in response to Interrogatory No. 2.

EXHIBIT B

**ATTACHMENT A TO SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION,
OR OBJECTS DIRECTED TO DCI GROUP AZ, L.L.C.**

DEFINITIONS

“Action” means *Greenspan v. Executive Office for U.S. Attorneys, et al.*, No. 1:23-cv-01816-BAH (D.D.C.), including the records that are the subject of that case.

“Attack” means any denial-of-service, distributed denial-of-service, or other deliberate effort to disrupt, degrade, or overload the servers or services of plainsite.org or any other website or server operated by Plaintiff.

“Document” has the full meaning given in Federal Rule of Civil Procedure 34(a)(1)(A), and includes electronically stored information, e-mail, text and instant messages, messages on any collaboration or messaging platform, social-media posts and drafts of posts, and all attachments, in Your possession, custody, or control.

“Engagement” means Your engagement by or on behalf of the Republic of Nigeria, Aster Legal, or any official or agency of the Government of Nigeria, including under the Client Services Agreement effective December 12, 2025 that You filed with the FARA Registration Unit of the U.S. Department of Justice on December 18, 2025 (Registration No. 6278), and any Work Order, amendment, or renewal thereof.

“Plaintiff” means Aaron Greenspan, PlainSite, plainsite.org, Think Computer Corporation, and Think Computer Foundation.

“Secure Nigeria Account” means the account on X (formerly Twitter) with the handle @SecureNigeriaHQ, the website securenigeria.com, and any other account, website, or channel that You operate or have operated in connection with the Engagement.

“You” and “Your” mean DCI Group AZ, L.L.C., its parent company and any other affiliated entity through which the Engagement is performed, and their respective members, managers, officers, employees, agents, contractors, subcontractors, and any person acting on their behalf.

INSTRUCTIONS

1. Unless otherwise stated, the relevant period is December 12, 2025 through the date of production.

2. Produce Documents as they are kept in the usual course of business or organized and labeled to correspond to the numbered requests below. Fed. R. Civ. P. 45(e)(1)(A).

Electronically stored information may be produced as text-searchable PDF files or in native format, with the date, sender, and recipients of each communication legible.

3. If You withhold any Document or portion of a Document on a claim of privilege or protection, describe the nature of the Document withheld in a manner that will enable the claim to be assessed, as required by Federal Rule of Civil Procedure 45(e)(2)(A).

4. This subpoena does not seek Your communications with Members of Congress, congressional staff, or officers or employees of the Executive Branch of the United States, except to the extent such a communication refers to Plaintiff or the Action. It does not seek Documents concerning any client other than the Engagement.

5. Production may be made by e-mail to aaron.greenspan@plainsite.org.

DOCUMENTS REQUESTED

Request No. 1. All Documents dated on or after December 12, 2025 that refer to Plaintiff or to the Action, including Work Orders, monthly reports, drafts, internal communications, and communications with Aster Legal, the Republic of Nigeria, or any official or agency of the Government of Nigeria.

Request No. 2. All Documents concerning the post about Plaintiff published on the Secure Nigeria Account on August 5, 2026, including drafts, approvals, instructions, research, and communications concerning its preparation, publication, or editing, and Documents sufficient to identify each person who drafted, approved, or published it.

Request No. 3. All Documents concerning any Attack, or concerning any denial-of-service, “DDoS,” botnet, “stresser,” or “booter” service, or any traffic directed at plainsite.org, including communications with any vendor, contractor, or subcontractor.

Request No. 4. Documents sufficient to identify each person or entity You retained, paid, or subcontracted in connection with the Engagement whose work concerned Plaintiff or the Action, the scope of that work, and the amounts paid.

Request No. 5. All monthly reports and any final report delivered under Section 2 of the Client Services Agreement, and all Work Orders issued under Section 1, to the extent they refer to Plaintiff, the Action, or the records that are the subject of the Action.