

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Strike 3 Holdings, LLC v. John Doe subscriber assigned IP address
104.220.84.74

No. 2:25-cv-03450-JAM-CKD · No. No. 2:25-cv-03450-JAM-CKD · Decided December 16, 2025

SUMMARY

The United States District Court for the Eastern District of California grants Strike 3 Holdings, LLC’s ex parte application for expedited discovery to identify the subscriber associated with IP address 104.220.84.74 in a copyright infringement action. The order limits the subpoena to the subscriber’s true name and address and imposes protections concerning notice, service, confidentiality, and an optional informal conference. The court requires a status report within 60 days and cautions that the plaintiff may not disclose the defendant’s identity without further court permission.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	December 16, 2025
DOCKET	No. 2:25-cv-03450-JAM-CKD
PROCEDURAL POSTURE	Plaintiff sought ex parte leave to conduct expedited discovery before the Rule 26(f) conference by subpoenaing its Internet service provider to identify an anonymous defendant accused of copyright infringement.
STANDARD OF REVIEW	Good cause governs whether to permit expedited discovery before the Rule 26(f) conference. The court also considered the Arista Records factors concerning identification subpoenas and balanced the need for discovery against the potential defendant's privacy interests.

QUESTIONS PRESENTED

- Whether the plaintiff had shown good cause for expedited discovery before the Rule 26(f) conference.
- Whether the court should authorize a subpoena to the Internet service provider seeking the name and address associated with the subject IP address.
- What privacy and procedural safeguards were necessary before allowing the subpoena and any subsequent service of process.

HOLDINGS

1. A court may authorize expedited discovery before the Rule 26(f) conference when good cause exists, meaning the need for expedited discovery, in light of the administration of justice, outweighs prejudice to the responding party.
2. The court may consider the concreteness of the prima facie claim, specificity of the discovery request, availability of alternative means, need for the information to advance the claim, and the potential defendant's expectation of privacy in deciding whether to authorize an identification subpoena.
3. Expedited discovery may be authorized only on narrowly tailored terms: the ISP subpoena may seek only the true name and address of the person or entity assigned the IP address; the identified person must receive the order; the person must have an opportunity to move to quash; formal service and disclosure of the identity require further court authorization.

FACTUAL BACKGROUND

Strike 3 Holdings alleged that an unidentified person using IP address 104.220.84.74 downloaded and distributed its copyrighted adult films through BitTorrent. The plaintiff could identify the alleged infringer only through the IP address and sought the subscriber's true name and address from the Internet service provider. The court recognized that the subscriber might not be the person who used a device to download the films and that disclosure could cause embarrassment, reputational harm, or pressure to settle.

PROCEDURAL HISTORY

Plaintiff filed the copyright action against a John Doe defendant identified only by an IP address and moved for leave to serve a third-party subpoena before the Rule 26(f) conference. The court granted the application subject to limited discovery, notice, privacy protections, an opportunity to seek quashing of the subpoena, and restrictions on service and disclosure.