

**TARA KING**  
1094 Chavez Court  
North Las Vegas, Nevada 89031  
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*Defendant in proper person*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**  
**SOUTHERN DIVISION**

SLEP-TONE ENTERTAINMENT CORPORATION,	)	
	)	
Plaintiff,	)	<b>CASE NO. 2:11-cv-0239-KJD-RJJ</b>
	)	
vs.	)	
	)	
ELLIS ISLAND CASINO & BREWERY; et al.,	)	<b>TARA KING'S INTERROGATORIES TO SLEP-TONE ENTERTAINMENT CORPORATION</b>
	)	
Defendants.	)	
_____	)	

**TO: SLEP-TONE ENTERTAINMENT CORPORATION; and,**  
**TO: JAMES M. HARRINGTON, ESQ., of HARRINGTON LAW, P.C., and KERRY P. FAUGHNAN, ESQ.: its attorneys"**

**COMES NOW**, Defendant, Tara King dba DJ Tera King Productions, and herein pursuant to Federal Rule of Civil Procedure 33 (a) serves these interrogatories to be answered by the Plaintiff, Slep-Tone Entertainment Corporation:

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**Interrogatory Number 1:**

Paragraph 24 of Slep-Tone Entertainment Corporation’s Complaint filed in the above-entitled action make the following allegation:

Defendants DJ TARA KING PRODUCTIONS and TARA KING have their principle business address in Las Vegas, Nevada and are engaged in the business of providing karaoke entertainment at multiple venues in this State using multiple karaoke systems.

With respect to the allegation made in paragraph 24 of Slep-Tone Entertainment Corporation’s Complaint as cited above, state the following:

- a. The dates on which DJ Tara King Productions and Tara King provided karaoke entertainment services at more than one venue at the same time.
- b. For each date listed in answer to Interrogatory 1(a), the name and address of the multiple venues where DJ Tara King Productions and Tara King provided entertainment services.

**Interrogatory Number 2:**

Paragraph 70 of Slep-Tone Entertainment Corporation’s Complaint filed in the above-entitled action makes the following allegation:

...based upon investigation of their activities, the present Defendants are in possession of, and/or have used, authorized, or benefitted from the use and display of unauthorized media-shifted and format-shifted copies of karaoke accompaniment tracks which have been marked falsely with SLEP-TONE’s federally registered trademarks.

With respect to how the allegations made in paragraph 70 of Slep-Tone Entertainment Corporation’s Complaint relate to Defendant Tara King state the following:

- a. The name and address of the person who investigated Tara King’s activities;

.....

b. The name and address of each person who accompanied the investigator identified in answer to Interrogatory 2(a) during any portion of the investigator's investigation of Tara King dba DJ Tara King Productions' activities.

c. The date or dates on which such investigation of Tara King dba DJ Tara King Productions' activities took place;

d. The name and address of the location where the investigation of Tara King dba DJ Tara King Productions' activities took place; and,

e. The identification of the disc(s) and song track(s) being played by Tara King dba DJ Tara King Productions wherein the investigator witnessed the use and display of unauthorized media-shifted and format-shifted copies of karaoke accompaniment tracks which were marked falsely with SLEP-TONE's federally registered trademarks.

**Interrogatory Number 3:**

Paragraph 72 of Slep-Tone Entertainment Corporation's Complaint filed in the above-entitled action makes the following allegation:

SLEP-TONE's conditions for tolerance of media-shifting and format-shifting included, without limitation that (a) that each media-shifted or format-shifted track must have originated from an original, authentic Sound Choice compact disc; (b) that the tracks from the original, authentic Sound Choice compact disc be shifted to one, and only one, alternative medium at a time, (c) that the KJ maintain ownership and possession of the original, authentic Sound Choice compact disc for the entire time that the media-shifted or format-shifted tracks are in existence; (d) that the original authentic Sound Choice compact disc not be used for any commercial purpose while its content has been shifted to the alternative medium; and (e) that the KJ notify SLEP-TONE that he or she intends to conduct or has conducted a media-shift or format-shift, and submits to a verification by a SLEP-TONE representative of adherence to SLEP-TONE's policy,"

.....

and Paragraph 74 of Slep-Tone's Complaint filed in the above-entitled action makes the following allegation:

Each of the Defendants has used media-shifted and/or format-shifted karaoke accompaniment tracks marked with the SLEP-TONE's registered trademarks for commercial purposes,"

and, further, Paragraph 75 of Slep-Tone's Complaint filed in the above-entitled action makes the following allegation:

Without exception, the Defendants' media-shifting activities have been undertaken outside the conditions of tolerance described above."

Which of the conditions of tolerance listed as (a) through (e) in paragraph 71 of Slep-Tone Entertainment Corporation's Complaint did Defendant Tara King violate with respect to each disc and song track identified in Slep-Tone's answer to Interrogatory 2(e).

**Interrogatory Number 4:**

What is the name, address and telephone number of each witness Slep-Tone Entertainment Corporation reserves the right to have testify at time of trial in support of the allegations made in the Complaint filed in the above-entitled action.

**Interrogatory Number 5:**

Describe each document sufficient to be unambiguously identified in a request for production of documents each document Slep-Tone Entertainment Corporation reserves the right to admit into evidence at time of trial in support of the allegations made in the Complaint filed in the above-entitled action.

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....

**Interrogatory Number 6:**

Identify each Sound Choice karaoke song track by disc number, track number and song on which the mark “®” appears next to the Sound Choice logo during the video display which appears when the karaoke song track is played.

**Interrogatory Number 7:**

With respect to each Sound Choice karaoke song track identified in answer to Interrogatory Number 6, state the date the mark “®” first appeared during the video display on discs marketed to the public.

**Interrogatory Number 8:**

With respect to all cases filed after September 1, 2007, identify by case name, court and case number all lawsuits in which Slep-Tone Entertainment Corporation was named as a plaintiff

**Interrogatory Number 9:**

If Slep-Tone Entertainment Corporation has ever been accused of producing a karaoke accompaniment song track without the permission or license of the holder of the original song or music copyright, state the following with respect to each such accusation:

- a. The name and address of the entity which made the accusation;
- b. The name of the artist and song upon which the accusation of infringement of copyright was based;
- c. Whether the holder of the copyright made a claim for compensation;
- d. If litigation was initiated to enforce the copyright, state the name of the case, the name of the court and the case number.

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e. If the claim or litigation resulted in a settlement or judgment, the dollar amount of the settlement or judgment.

**Interrogatory Number 10:**

For each time a person most knowledgeable at Slep-Tone Entertainment Corporation was deposed since September 1, 2007, state the following:

- a. The case name, court and case number in which such person was deposed.
- b. The name and address of the person who was designated by Slep-Tone Entertainment Corporation as the person most knowledgeable.
- c. The subject matter as stated in the notice of deposition or subpoena for which each person was designated by Slep-Tone Entertainment Corporation as the person most knowledgeable.
- d. The name and address of the court reporter and the date the deposition was taken of the person most knowledgeable.

Dated this 27th day of August, 2012.

DJ TARA KING PRODUCTIONS

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*Defendant in proper person*

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**CERTIFICATE OF MAILING**

I hereby certify that on the 27th day of August, 2012, I mailed a true and correct copy of the foregoing TERA KING’S INTERROGATORIES TO SLEP-TONE ENTERTAINMENT CORPORATION via first class mail, postage prepaid, in a sealed envelope, by depositing same in a receptacle marked for mailing with the United States Postal Service and addressed to the following:

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