Case 2:07-cv-02534-ABC-JC Document 95 Filed 03/24/2008 Page 1 of 3 MANATT, PHELPS & PHILLIPS, LLP 1 ROBERT H. PLATT (Bar No. CA 108533) 2 rplatt@manatt.com MARK S. LEE (Bar No. CA 094103) 3 mlee@manatt.com DONALD R. BROWN (Bar No. CA 156548) 4 dbrown@manatt.com 11355 West Olympic Boulevard Los Angeles, CA 90064-1614 5 Telephone: (310) 312-4000 Facsimile: (310) 312-4224 6 Attorneys for Plaintiff 7 TICKETMASTER L'.L.C. 8 UNITED STATES DISTRICT COURT 9 CENTRAL DISTRICT OF CALIFORNIA 10 11 Case No. CJ 07-2534 ABC(JWJx) TICKETMASTER L.L.C., a Virginia 12 limited liability company, Hon. Jeffrey W. Johnson 13 Plaintiff, DISCOVERY MOTION 14 VS. TICKETMASTER, L.L.C.'S 15 NOTICE OF MOTION FOR RMG TECHNOLOGIES, INC., a PROTECTIVE ORDER Delaware corporation, and DOES 1 16 through 10, inclusive, [Filed Concurrently With: Joint Statement Regarding Plaintiff's 17 Defendants. Motion For Protective Order; 18 Declarations of Kevin McLain, Raaqim Knight, Cipriano Garibay, and David Tarlow; September 13, 19 2007 Scheduling Order 20 21 Hearing Date: April 17, 2008 Hearing Time: 2:00 p.m. 22 Courtroom C, 8th Fl, Location: 312 North Spring St. 23 Pre-Trial Conf.: September 15, 2008 24 Trial Date: October 1, 2008 Discovery Cut-Off: May 23, 2008 25 26 27 28 41220108.1

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on April 17, 2008, at 2:00 p.m., in the courtroom of the Honorable Jeffrey W. Johnson, located at 312 North Spring Street, Los Angeles, California, in Courtroom C, 8th floor, Plaintiff Ticketmaster L.L.C. ("Ticketmaster") will and hereby does move pursuant to Federal Rules of Civil Procedure 26(c)(1) and Local Rules 37-2 and 37-2.1 for a protective order which would restrict the disclosure and use of confidential documents and information in this litigation by: (a) creating two-levels of protection through requiring the good faith designation of confidential material as "Confidential Information" or "Sensitive Confidential Material"; (b) limiting the disclosure of "Confidential Information" to parties, counsel, witnesses, experts, Court personnel, and professional vendors to this litigation; and (c) restricting parties' and witnesses' access to information designated as "Sensitive Confidential Information" under certain circumstances.

Prior to filing this Motion, the parties have met and conferred pursuant to Local Rule 37-1 and made a good faith attempt to resolve this dispute but were unable to do so.

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This Motion for Protective Order is based upon this Notice, the concurrently filed Joint Statement Regarding Plaintiff's Motion for Protective Order, the declarations of Kevin McLain, Raaqim Knight, Cipriano Garibay, and David Tarlow, the pleadings and records on file in this action, and such other matters as the Court deems necessary and proper. March 24, 2008 Manatt, Phelps & Phillips, LLP Dated: Attorneys for Plaintiff Ticketmaster, L.L.C.

MANATT, PHELPS &
PHILLIPS, LLP
ATTORNESS AT LAN
LOS ANGELES

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