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15 Attorneys for Defendant
VEOH NETWORKS, INC.

16 **UNITED STATES DISTRICT COURT**
17 **CENTRAL DISTRICT OF CALIFORNIA**
18 **WESTERN DIVISION**

20 UMG RECORDINGS, INC., *et al.*,)
21 Plaintiffs,)
22 vs.)
23 VEOH NETWORKS, INC. a California)
Corporation, DOES 1-10, inclusive,)
24 Defendants.)
25 [Joint Stipulation of Parties Filed May
26 Date: June 23, 2008
27 Time: 10:00 a.m.
28 Crtrm: 690, The Hon. Andrew J.
Wistrich

1 PLEASE TAKE NOTICE that on Monday, June 23, 2008 at 10:00 a.m. (and
2 not on June 16, 2008 as previously noticed), or as soon thereafter as this matter may
3 be heard in the Courtroom of Judge Andrew J. Wistrich, Courtroom 690 of the above-
4 entitled Court, located at 255 East Temple Street, Los Angeles, California, 90012,
5 Defendant Veoh Networks, Inc. will and hereby does move, pursuant to the Federal
6 Rules of Civil Procedure, Rule 26(c), for an order entering the protective order
7 attached as Exhibit A to the Declaration of Jennifer A. Golinveaux ("Golinveaux
8 Decl.").

9 This Motion is brought pursuant to Rule 26(c) of the Federal Rules of Civil
10 Procedure on the grounds that to protect Veoh's confidential technological and
11 commercial information, this court should enter Veoh's [Proposed] Protective Order,
12 which includes a requirement that the parties disclose their experts or consultants
13 before they are allowed access to a parties' confidential material, and a reasonable
14 challenge provision.

15 This Motion is based on this Notice of Motion and Motion, the Joint Stipulation
16 Regarding Defendant Veoh Networks, Inc.'s Motion For Entry of Protective Order
17 (filed May 22, 2008), the Declaration of Jennifer A. Golinveaux (filed May 22, 2008),
18 all pleadings and papers on file herein, and upon such further oral and documentary
19 evidence as may be presented at or before the hearing on this Motion.

20 This Motion is made following the conference of counsel pursuant to L.R. 37-1,
21 which took place on April 25, 2008. (Golinveaux Decl., ¶ 5).

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23 Dated: May 27, 2008

WINSTON & STRAWN LLP

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25 By /s/ Erin R. Ranahan
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28 Jennifer A. Golinveaux
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