

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

DOE I, and DOE II,
Plaintiffs,

Case No. 3:07CV00909(CFD)

v.

Date: January 24, 2008

Individuals, whose true names are unknown, using the following pseudonyms: pauliewalnuts; neoprag; STANFORDtroll; :D; lkjhgf; yalelaw; Spanky; ylsdooder; HI; David Carr; vincimus; Cheese Eating Surrender Monkey; A horse walks into a bar; The Ayatollah of Rock-n-Rollah; DRACULA; Sleazy Z; Whamo; Ari Gold; Ugly Women; playboytroll; Dean_Harold_Koh; kr0nz; reminderdood; r@ygold; who is; Joel Schel1 hammer; Prof. Brian Leiter; hitlerhitlerhitler; lonelyvirgin; Patrick Zeke <patrick8765@hotmail.com>; Patrick Bateman <batemanhls08@hotmail.com>; [DOE I] got a 157 LSAT; azn, azn, azn; Dirty Nigger; leaf; t14 gunner; kibitzer; yalels2009; AK47,

EMERGENCY RELIEF REQUESTED

Defendants.

PLAINTIFFS' MOTION FOR EXPEDITED DISCOVERY

Plaintiffs DOE I and DOE II move this Court, under Federal Rule of Civil Procedure 26(d), to permit limited, expedited discovery in advance of the Rule 26(f) conference. Plaintiffs need this discovery to unearth the identities of the pseudonymous defendants and serve them with process, conduct a meet and confer, and proceed with this action. If this motion is not granted, plaintiffs will not be able to hold a Rule 26(f) conference, and, indeed, will not be able seek redress of their injuries through the courts. Plaintiffs further request that the Court consider the merits of this motion on an expedited basis since the information sought by plaintiffs is

subject to the threat of deletion. In support of this motion, plaintiffs submit herewith a Memorandum of Law, Declarations by Plaintiffs DOE I and DOE II,¹ a Declaration by Plaintiffs' Counsel, and a Proposed Order.

Dated: January 24, 2008

PLAINTIFFS DOE I AND
DOE II

By: /s/ Steve Mitra
Mark Lemley (*pro hac vice*)
Ashok Ramani (*pro hac vice*)
Steve Mitra (*pro hac vice*)
KEKER & VAN NEST, LLP
710 Sansome Street
San Francisco, CA 94111
Telephone: (415) 391-5400
Facsimile: (415) 397-7188
Email: MLemley@kvn.com
ARamani@kvn.com
SMitra@kvn.com

David N. Rosen
David Rosen & Associates PC
400 Orange Street
New Haven, CT 06511
Telephone: (203) 787-3513
Facsimile: (203) 789-1605
Email: drosen@davidrosenlaw.com

¹ On June 8, 2007, the plaintiffs moved the Court to allow them to proceed anonymously in this case in light of the defendants' egregious actions. The Court granted the motion on June 18, 2007. Plaintiffs' names have therefore been redacted and replaced with DOE I and DOE II in the motion, memorandum, declarations, and exhibits.

CERTIFICATION OF SERVICE

The addresses of all the defendants are unknown. This is to certify that a copy of this motion has been sent to the following by first class mail, postage prepaid on **January 24, 2008**, to:

| | |
|--|------------------------------------|
| Marc Randazza, Esq. Weston, Garrou, DeWitt & Walters 781 Douglas Ave. Altamonte Springs, FL 32714 | <i>Attorney for Anthony Ciolli</i> |
| Leighton Cohen, Esq. 465 West Linden Street Allentown, PA 18102 | <i>Attorney for Jarret Cohen</i> |

/s/ Steve Mitra
STEVE MITRA