

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

AVI KOSCHITZKI, on Behalf of Himself and all Others Similarly Situated,

Plaintiff,

v.

Case No. 1:08-cv-04451-JBW-VVP

APPLE INC. and AT&T MOBILITY LLC,

Defendants.

**NOTICE OF MOTION AND MOTION OF
AT&T MOBILITY LLC FOR A PROTECTIVE ORDER**

TO: ALL PARTIES IN INTEREST:

PLEASE TAKE NOTICE THAT, defendant AT&T Mobility LLC (“ATTM”) will respectfully move this court, before the Honorable Viktor V. Pohorelsky, United States District Magistrate Judge, Eastern District of New York, at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York, on February 23, 2009 at 3:00 p.m., pursuant to Federal Rule of Civil Procedure 26(c), for a protective order barring plaintiff Avi Koschitzki from taking the noticed depositions of Carolina Mahone-Gonzalez, Adam Gill, Richard Nagareda, and TJ Terry.

In support of this Motion, ATTM relies upon its supporting Memorandum of Law and the Supplemental Declaration of TJ Terry, which are being filed concurrently herewith.

Dated: February 23, 2008

Respectfully submitted,

/s Kevin Ranlett
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