

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ARISTA RECORDS LLC; ATLANTIC RECORDING CORPORATION; BMG MUSIC; CAPITOL RECORDS, INC.; ELECTRA ENTERTAINMENT GROUP INC.; INTERSCOPE RECORDS; LAFACE RECORDS LLC; MOTOWN RECORD COMPANY, L.P.; PRIORITY RECORDS LLC; SONY BMG MUSIC ENTERTAINMENT; UMG RECORDINGS, INC.; and WARNER BROS. RECORDS INC.,

Plaintiffs,

v.

LIME WIRE LLC; LIME GROUP LLC; MARK GORTON; GREG BILDSON; and M.J.G. LIME WIRE FAMILY LIMITED PARTNERSHIP,

Defendants

06 Civ. 05936 (KMW)
ECF CASE

**NOTICE OF MOTION AND
MOTION FOR PERMANENT
INJUNCTION AGAINST LIME
WIRE LLC; LIME GROUP LLC
AND MARK GORTON**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that as soon as counsel may be heard before the Honorable Kimba M. Wood in Courtroom 15B, United States Courthouse, 500 Pearl Street, New York, New York, all Plaintiffs in Case No. 06 Civ. 05936 (“Plaintiffs”) will and hereby do move the Court pursuant to 17 U.S.C. § 502 and Federal Rule of Civil Procedure 65(d) for entry of a permanent injunction against defendants Lime Wire LLC, Lime Group LLC and Mark Gorton.

PLEASE TAKE FURTHER NOTICE that this Motion is based on this Notice of Motion and Motion, the accompanying Memorandum of Law, the concurrently filed Declarations of Kelly M. Klaus, Jillian Song and Prof. Ellis Horowitz and all exhibits thereto, the Proposed Permanent Injunction, any Reply Memorandum in support, the court records and files (including the Court’s Order on the parties’ summary judgment motions dated May 11, 2010 as amended

May 25, 2010), and upon such other evidence and argument that may be offered at the hearing on the Motion.

Dated: June 4, 2010

Respectfully submitted

/s/ Kelly M. Klaus

Kelly M. Klaus

Attorney for Plaintiffs

Munger, Tolles & Olson LLP

355 South Grand Avenue, 35th Floor

Los Angeles, CA 90071-1560

(213) 683-9100

(213) 687-3702 (Fax)

Kelly.Klaus@mto.com