

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ARISTA RECORDS LLC; ATLANTIC RECORDING CORPORATION; BMG MUSIC; CAPITOL RECORDS, INC.; ELEKTRA ENTERTAINMENT GROUP INC.; INTERSCOPE RECORDS; LAFACE RECORDS LLC; MOTOWN RECORD COMPANY, L.P.; PRIORITY RECORDS LLC; SONY BMG MUSIC ENTERTAINMENT; UMG RECORDINGS, INC.; VIRGIN RECORDS AMERICA, 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 OF PLAINTIFFS FOR
PRELIMINARY INJUNCTION
FREEZING DEFENDANTS'
ASSETS**

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 Federal Rule of Civil Procedure Rules 64 and 65 for entry of a preliminary injunction enjoining Defendants, and anyone acting in concert with them, from transferring or otherwise disposing of any existing or future assets in their possession, custody, or control, as described in greater detail in the Proposed Order submitted concurrently herewith.

PLEASE TAKE FURTHER NOTICE that this Motion is based on the Notice of Motion, Motion and the accompanying Memorandum of Points and Authorities, the Declaration of Kelly M. Klaus, and any Reply Memorandum in support, the court records and files (including the

Court's Amended Order on the parties' summary judgment motions dated May 25, 2010), and upon such other evidence and argument that may be offered at the hearing on the Motion.

Dated: June 7, 2010
Los Angeles, CA

Respectfully submitted

/s/ Kelly M. Klaus

Kelly M. Klaus (*pro hac vice*)

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)