

**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.

Case No. 06 CV 5936 (KMW)

ECF Case

**DEFENDANTS LIME WIRE LLC, LIME
GROUP LLC, AND MARK GORTON'S NOTICE OF MOTION
AND MOTION TO FILE CONFIDENTIAL MATERIAL UNDER SEAL**

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Lime Wire Family Limited Partnership*

NOTICE TO THE COURT, PLAINTIFFS AND THEIR COUNSEL OF
RECORD:

On motion of the parties, the Court entered a Stipulated Protective Order on March 8, 2007 (the “Protective Order”), a copy of which is on file with the Court (Dkt. 21). Information produced by a party may be designated under the terms of the Protective Order if it believes in good faith that it reflects proprietary information which is not generally known, or if the party has a good faith belief that such materials are particularly sensitive. *See* Protective Order ¶¶ 1, 15. Paragraph 14 of the Protective Order requires a party submitting Confidential or Confidential-Attorney’s Eyes Only material to the Court to file such material under seal to protect it from disclosure.

Pursuant to the Protective Order, Defendants Lime Wire LLC, Lime Group LLC, and Mark Gorton (the “Defendants”) hereby move this Court to place under seal, until further order of this Court, the following documents filed in support of Defendants Lime Wire LLC, Lime Group LLC, and Mark Gorton’s Opposition to Plaintiffs’ Motion for Permanent Injunction:

- Declaration of Dr. Steven D. Gribble and Exhibit A attached thereto;
- Declaration of Francis Kim;
- Declaration of Tonia Ouellette Klausner and Exhibits 1 and A-DD attached thereto;
- Declaration of Tom Monday and Exhibit A attached thereto;
- Declaration of John Pavley and Exhibit A attached thereto;
- Declaration of George Searle;
- Declaration of Zeeshan Zaidi and Exhibits A-C attached thereto;

- The unredacted, confidential version of Defendants Lime Wire LLC, Lime Group LLC, and Mark Gorton's Opposition to Plaintiffs' Motion for Permanent Injunction.

The above-listed declarations have been designated by Defendants as Confidential under the Protective Order. Certain of the documents attached as exhibits to the above-listed declarations have been previously produced in litigation and have been designated as Confidential or Confidential-Attorney's Eyes Only. And Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion for Permanent Injunction discusses information that has been designated as Confidential or Confidential-Attorney's Eyes Only.

Accordingly, Defendants respectfully request that the above-listed documents be maintained under seal until further order of this Court.

Respectfully submitted,

Dated: June 21, 2010
New York, New York

By: s/ Michael S. Sommer
Michael S. Sommer

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