

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 MUSIC ENTERTAINMENT, fka  
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

**PLAINTIFFS' NOTICE OF MOTION AND  
MOTION TO FILE CONFIDENTIAL MATERIAL UNDER SEAL**

Glenn D. Pomerantz (*pro hac vice*)  
Kelly M. Klaus (*pro hac vice*)  
Melinda E. LeMoine  
Jonathan H. Blavin (*pro hac vice*)  
Munger, Tolles & Olson LLP  
355 South Grand Avenue  
Los Angeles, CA 90071  
(213) 683-9100

*Attorneys for Plaintiffs*

Date: July 7, 2010

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

Pursuant to the Protective Order entered in this action on March 8, 2007, Plaintiffs hereby move this Court to place under seal, until further order of this Court, the following documents offered in support of Plaintiffs' Motion for a Preliminary Injunction Freezing Defendants' Assets:

- Confidential version of the Reply Memorandum of Law (redacted version publicly filed)

On motion of the parties, the Court entered a Stipulated Protective Order (the "Protective Order") on March 8, 2007, concerning information produced in discovery, a copy of which is on file with the Court (Dkt. 21). The above-referenced document contains material that has been designated by the parties as either Confidential or Confidential-Attorney's Eyes Only under the Protective Order. Further, in their Opposition, Defendants designated certain material Confidential under the Protective Order. Accordingly, Plaintiffs have designated material responding to and incorporating that material as Confidential under the Protective Order.

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. Accordingly, Plaintiffs respectfully request that the foregoing document be maintained under seal until further order of this court.

Dated: July 7, 2010  
Los Angeles, CA

Respectfully submitted

/s/ Jonathan H. Blavin  
Jonathan H. Blavin

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)