

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ARISTA RECORDS LLC; ATLANTIC
RECORDING CORPORATION; ARISTA
MUSIC, fka BMG MUSIC; CAPITOL
RECORDS LLC fka 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; and M.J.G. LIME WIRE
FAMILY LIMITED PARTNERSHIP,

Defendants.

06 Civ. 05936 (KMW)
ECF CASE

**PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR
EXPEDITED APPOINTMENT OF RECEIVER TO ENSURE COMPLIANCE WITH
PERMANENT INJUNCTION**

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Date: November 18, 2010

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 the Court’s equitable powers for the expedited appointment of a receiver to ensure Defendants’ compliance with the Court’s permanent injunction, 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 Professor Ellis Horowitz, the Declaration of Kelly M. Klaus, and any Reply Memorandum in support, the court records and files (including the Court’s permanent injunction, dated October 26, 2010), and upon such other evidence and argument that may be offered at the hearing on the Motion.

Dated: November 18, 2010

Respectfully submitted

/s/ Kelly M. Klaus

Kelly M. Klaus

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