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DOC #: _____
DATE FILED: <u>11/22/10</u>

U UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

<p>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.,</p> <p style="text-align: right;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>LIME WIRE LLC; LIME GROUP LLC; MARK GORTON; and M.J.G. LIME WIRE FAMILY LIMITED PARTNERSHIP,</p> <p style="text-align: right;">Defendants.</p>
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MEMO ENDORSED

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*)
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Attorneys for Plaintiffs

Date: November 18, 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:

- Plaintiffs' Memorandum of Points and Authorities in Support of Motion for Expedited Appointment of Receiver to Ensure Compliance with Permanent Injunction (unredacted, confidential version)
- Declaration of Professor Ellis Horowitz in Support of Plaintiffs' Motion for Expedited Appointment of Receiver and exhibits attached thereto
- Exhibits B-I of the Declaration of Kelly M. Klaus in Support of Plaintiffs' Motion for Expedited Appointment of Receiver (unredacted, confidential version)

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 documents contain material that has been designated by the parties as either Confidential or Confidential-Attorney's Eyes Only 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 documents be maintained under seal until further order of this court.

Request
Granted.
The
documents
described in
this motion
may be
filed under
seal.
All other
documents
shall be filed
publicly with
the court.
KMW

Dated: November 18, 2010

Respectfully submitted

/s/ Kelly M. Klaus
Kelly M. Klaus

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11-22-10

SO ORDERED:

Kimba M. Wood
KIMBA M. WOOD
U. S. D. J.