

U 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 TO FILE CONFIDENTIAL MATERIAL UNDER SEAL**

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Date: November 24, 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' Reply in Support of Motion for Expedited Appointment of Receiver to Ensure Compliance with Permanent Injunction (unredacted, confidential version)
- Exhibit M of the Supplemental Declaration of Kelly M. Klaus in Support of Plaintiffs' Reply in Support of Motion for Expedited Appointment of Receiver to Ensure Compliance with Permanent Injunction (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.

Dated: November 24, 2010

Respectfully submitted

/s/ Kelly M. Klaus

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