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DOCUMENT

ELECTRONICALLY FILED

U UNITED STATES DISTRICT COLOR SOUTHERN DISTRICT OF NEW Y WATE FILED: 11/30/10

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, fka SONY BMG RECORDINGS, INC.; VIRGIN RECORDS AMERICA, INC.; and WARNER BROS. RECORDS INC.,

06 Civ. 05936 (KMW) ECF CASE

Plaintiffs.

٧.

LIME WIRE LLC; LIME GROUP LLC; MARK GORTON; and M.J.G. LIME WIRE FAMILY LIMITED PARTNERSHIP,

Defendants.

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: November 24, 2010

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Doc. 381

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 Kelly M. Klaus pequest Granted.

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)

CO ORDERED: 11 - 29 -10

KIMBA M. WOOL