

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**

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: January 14, 2011

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

Pursuant to the Amended Protective Order entered in this action on January 6, 2011, Plaintiffs hereby move this Court to place under seal, until further order of this Court, the following documents:

- Plaintiffs' January 14, 2011 Letter to the Honorable Debra Freeman and Exhibit S thereto (confidential version)

On January 6, 2011, the Court entered an Amended Stipulation and Protective Order (the "Amended Protective Order"), concerning information produced in discovery, a copy of which is on file with the Court (Dkt. 400). The above-referenced documents contain material that has been designated by the parties as either Confidential or Confidential-Attorney's Eyes Only under the Amended Protective Order.

Paragraph 15 of the Amended 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: January 14, 2011

Respectfully submitted

/s/ Kelly M. Klaus

Kelly M. Klaus

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)

## CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2011, a copy of the foregoing document was served on the following via the Court's ECF system and by email per the parties' agreement:

Joseph T. Baio, Esq.  
Tariq Mundiya, Esq.  
Mary Jane Eaton, Esq.  
Todd G. Cosenza, Esq.  
Willkie Farr & Gallagher LLP  
787 Seventh Avenue  
New York, N.Y. 10019-6099  
Telephone: 212-728-8000  
Fax: 212-728-8111  
Email: jbaio@willkie.com  
Email: tmundiya@willkie.com  
Email: meaton@willkie.com  
Email: tcosenza@willkie.com

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

*/s/ Shari Lorand* \_\_\_\_\_  
Shari Lorand