

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ARISTA RECORDS LLC; ATLANTIC
RECORDING CORPORATION; BMG MUSIC;
CAPITOL RECORDS, INC.; ELEKTRA
ENTERTAINMENT GROUP INC.; INTERSCOPE
RECORDS; LAFACE RECORDS LLC;
MOTOWN RECORD COMPANY, L.P.;
PRIORITY RECORDS LLC; SONY BMG MUSIC
ENTERTAINMENT; UMG RECORDINGS, INC.;
VIRGIN RECORDS AMERICA, INC.; and
WARNER BROS. RECORDS INC.,

Plaintiffs,

– against –

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

Defendants.

ECF Case

06 Civ. 5936 (KMW)

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

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Attorneys for Defendants

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

On motion of the parties, the Court entered an Amended Stipulation and Protective Order on January 6, 2011 (the “Amended Protective Order”), a copy of which is on file with the Court (Dkt. 400). Information produced by a party may be designated under the terms of the Protective Order if it believes in good faith that it reflects proprietary information which is not generally known, or if the party has a good faith belief that such materials are particularly sensitive. *See* Protective Order ¶ 1. Paragraph 15 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.

Pursuant to the Amended Protective Order, Defendants Lime Group LLC, Lime Wire LLC, Mark Gorton, and M.J.G. Lime Wire Family Limited Partnership (collectively, “Defendants”) hereby move this Court to place under seal, until further order of this Court, the following documents:

- Declaration of Thomas Meloro, dated February 22, 2011 and Exhibits 1-13 attached thereto.

These documents contain material that has been designated by Plaintiffs and Defendants as Confidential-Attorney’s Eyes Only under the Amended Protective Order and/or its predecessor.

Accordingly, Defendants respectfully request that the above-listed document be maintained under seal until further order of this Court.

Dated: February 22, 2011

Respectfully Submitted,

WILLKIE FARR & GALLAGHER LLP

/s/ Thomas J. Meloro

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