

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ARISTA RECORDS LLC; ATLANTIC
RECORDING CORPORATION; ARISTA
MUSIC, fka BMG MUSIC; 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 GROUP LLC; LIME WIRE LLC; MARK
GORTON; GREG BILDSON; and M.J.G. LIME
WIRE FAMILY LIMITED PARTNERSHIP,

Defendants.

ECF Case

06 CV 5936 (KMW)

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

WILLKIE FARR & GALLAGHER LLP

787 Seventh Avenue
New York, NY 10019
Phone: (212) 728-8000

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, Confidential-Attorney’s Eyes Only, or Restricted Confidential-Outside Attorneys’ 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 document:

- Defendants’ Response to Non-Party Google, Inc.’s Objections to Magistrate Judge Freeman’s January 31, 2011 Order Compelling the Production of Internal and External Communications (unredacted version);
- Exhibit F of the Declaration of Paul W. Horan in Support of Defendants’ Response to Non-Party Google, Inc.’s Objections to Magistrate Judge Freeman’s January 31, 2011 Order Compelling the Production of Internal and External Communications;

This document contains material that has been designated by Plaintiffs and Defendants as Confidential, Restricted Confidential- Attorney’s Eyes Only, or Restricted Confidential- Outside 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 24, 2011

Respectfully Submitted,

WILLKIE FARR & GALLAGHER LLP

/s/ Mary Eaton

Mary Eaton (meaton@willkie.com)

787 Seventh Avenue

New York, New York 10019

Phone: (212) 728-8000

Fax: (212) 728-8111

Attorneys for Lime Group LLC, Lime Wire LLC, Mark Gorton, and M.J.G. Lime Wire Family Limited Partnership

To:

Glenn D. Pomerantz
Munger, Tolles & Olson LLP
355 South Grande Avenue, 35th Floor
Los Angeles, CA 90071