

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**

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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, 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 documents:

- Defendants’ Responsive Brief Regarding Statutory Damages On A “Per-Track” Versus “Per-Album” Basis (unredacted version);
- Exhibit 5 to the Declaration of John R. Oller in Support of Defendants’ Responsive Brief Regarding Statutory Damages On A “Per-Track” Versus “Per-Album” Basis;

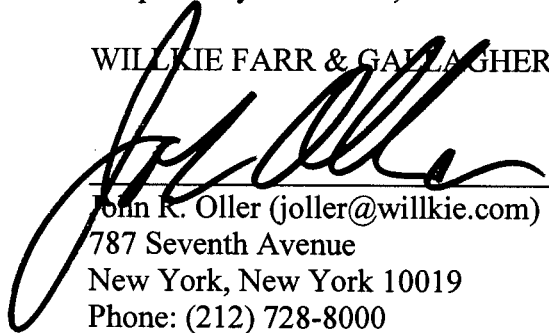
These documents reflect material that has been designated by Plaintiffs as Confidential, Restricted Confidential- Attorney’s Eyes Only, or Restricted Confidential-Outside Attorney’s Eyes Only under the Amended Protective Order and/or its predecessor.

Accordingly, to comply with Plaintiffs' designation and the Amended Protective Order, Defendants respectfully request that the above-listed documents be maintained under seal until further order of this Court.

Dated: February 24, 2011

Respectfully Submitted,

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