

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 UNDER SEAL

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Date: February 25, 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 document:

- Exhibit 2 to the Declaration of Melinda E. LeMoine in Support of Plaintiffs' Motion *In Limine* to Preclude Defendants' Argument That Other Illegal Services Would Have Induced Infringement Of Plaintiffs' Copyrights If Lime Wire Had Not

The above-referenced document—excerpts from the expert report of George G. Strong Jr.—contains detailed information Plaintiffs have designated “Restricted Confidential -- Outside Attorney's Eyes Only.” For example, information in these excerpts reflects confidential information regarding particular plaintiffs' digital revenues produced in this litigation, as well as the terms of confidential agreements between particular plaintiffs and third parties. This information is of a kind not ordinarily made public, and could cause competitive harm if made part of the public record. For this reason, Plaintiffs ask the Court to maintain this excerpt of the Strong report under seal.

Plaintiffs will include this Motion in the Letter Your Honor directed the parties to submit by March 11 collecting all of the requests for under seal treatment that have been filed since January 14.

Dated: February 25, 2011

Respectfully submitted

s/ Melinda E. LeMoine
Melinda E. LeMoine

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