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FILED UNDER SEAL**

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

VIACOM INTERNATIONAL INC., ET)	
AL.,)	
)	ECF Case
Plaintiffs,)	
v.)	Civil No. 07-CV-2103 (LLS)
)	
YOUTUBE, INC., ET AL.,)	
)	
Defendants.)	
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THE FOOTBALL ASSOCIATION)	
PREMIER LEAGUE LIMITED, ET AL.,)	
on behalf of themselves and all others)	ECF Case
similarly situated,)	
)	Civil No. 07-CV-3582 (LLS)
Plaintiffs,)	
v.)	
)	
YOUTUBE, INC., ET AL.,)	
)	
Defendants.)	
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**DEFENDANTS' NOTICE OF MOTION AND MOTION TO STRIKE
MATERIAL FROM VIACOM'S SUMMARY JUDGMENT SUBMISSIONS AND
PUTATIVE CLASS PLAINTIFFS' RULE 56.1 STATEMENT**

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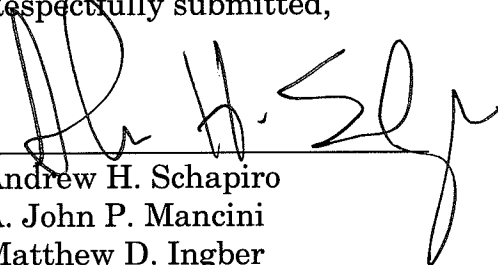
Attorneys for Defendants

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PLEASE TAKE NOTICE that, upon the Memorandum of Law in Support of Defendants' Motion to Strike Material From Viacom's Summary Judgment Submissions and Putative Class Plaintiffs' Rule 56.1 Statement, and all papers and pleadings filed herein, Defendants YouTube, Inc., YouTube, LLC and Google Inc. (collectively, "YouTube"), by their undersigned counsel, will move this Court at the United States Courthouse, 500 Pearl Street, New York, New York, before the Honorable Louis L. Stanton, United States District Judge, for an Order, pursuant to Federal Rule of Civil Procedure 56(e); Local Rule 56.1, and Local Rule 5.1 that the following should be stricken from the record in this action: (1) Exhibit 315 and substituted Exhibit 312 to the Declaration of William Hohengarten in Support of Viacom's Motion for Partial Summary Judgment; (2) Section I.A.3 of the Memorandum of Law in Support of Viacom's Motion For Partial Summary Judgment on Liability and Inapplicability of the Digital Millennium Copyright Act Safe Harbor Defense; and (3) Class Plaintiffs' Statement of Uncontroverted Material Facts in Support of Their Motion for Partial Summary Judgment.

Dated: April 30, 2010
New York, NY

Respectfully submitted,



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