

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

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CORY HUBBARD,)		11-cv-00433 (LAK)
)		
Plaintiff,)		ECF Case
)		
vs.)		
)		
MYSFACE, INC.,)		
)		
Defendant.)		
)		
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NOTICE OF MOTION FOR SANCTIONS UNDER RULE 11

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law dated March 28, 2011, and upon all prior pleadings and proceedings herein, the undersigned, attorneys for MySpace, Inc., hereby move this Court for sanctions and MySpace’s attorney’s fees and costs under Federal Rule of Civil Procedure 11, and for such other and further relief as the Court may deem just and proper. MySpace advised Plaintiff Cory Hubbard’s counsel in writing on February 11, 2011, of its intent to seek Rule 11 sanctions if Hubbard’s counsel did not withdraw Hubbard’s complaint, and MySpace served its memorandum of law in draft form on Hubbard’s counsel on March 4, 2011. In a memorandum of law Hubbard’s counsel filed on March 17, Hubbard’s counsel acknowledged MySpace’s intent to seek sanctions but declined to withdraw Hubbard’s amended complaint.

Dated: New York, New York
March 28, 2011

DEBEVOISE & PLIMPTON LLP

By: /s/ Michael B. Mukasey

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