

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
CAPITOL RECORDS, LLC, CAPITOL  
CHRISTIAN MUSIC GROUP, INC., and VIRGIN  
RECORDS IR HOLDINGS, INC.

Case No.: 12CV00095  
(RJS)

Doc. 214

Plaintiffs,

**NOTICE OF MOTION**

v.

REDIGI INC., JOHN OSSENMACHER and  
LARRY RUDOLPH a/k/a LAWRENCE S.  
ROGEL,

Defendants.

-----X

**PLEASE TAKE NOTICE**, that upon the accompanying Memorandum of Law dated April 11, 2016, the Declaration of Gary Adelman dated April 11, 2016, with the exhibits annexed thereto, and all prior proceedings had herein, Defendant ReDigi Inc., will move this Court before the Honorable Richard J. Sullivan, United States District Judge for the Southern District of New York, at the United States Courthouse, 40 Foley Square, New York, New York 10007, for a protective order, pursuant to F.R.C.P. 26(c), sealing in part the transcript of the conference that took place on April 4, 2016, as proposed herein, and such other and further relief as this Court deems just and proper.

Dated: New York, New York  
April 11, 2016

ADELMAN MATZ P.C.

By: 

Gary Adelman, Esq.

1173A Second Avenue, Suite 153

New York, New York 10065

Tel: (646) 650-2207

Email: g@adelmanmatz.com

*Attorneys for ReDigi Inc.*

To: [COUNSEL OF RECORD VIA ECF AND E-MAIL]