

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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| CAPITOL RECORDS, LLC, | : | 12 Civ. 0095 (RJS) |
| | : | |
| Plaintiff, | : | |
| | : | <u>NOTICE OF MOTION</u> |
| -against- | : | |
| | : | |
| REDIGI INC., | : | |
| | : | |
| Defendant. | : | |
| | : | |
| ----- X | | |

PLEASE TAKE NOTICE that upon the annexed Declarations of Alasdair J. McMullan, Richard S. Mandel and Colleen Hall and the exhibits thereto; the annexed Plaintiff's Statement of Undisputed Facts Pursuant to Local Rule 56.1; the accompanying Appendix of Deposition Excerpts from the Depositions of Larry Rudolph and John Ossenmacher; the accompanying Memorandum of Law in Support of Plaintiff's Motion for Partial Summary Judgment; and the pleadings and all prior proceedings had herein, Plaintiff Capitol Records, LLC hereby move this Court, before the Honorable Richard J. Sullivan, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, for an order, pursuant to Fed. R. Civ. P. 56, granting Plaintiff's motion for partial summary judgment finding Defendant liable for infringement of Plaintiff's reproduction and distribution copyright rights.

Dated: New York, New York
July 20, 2002

COWAN, LIEBOWITZ & LATMAN, P.C.
Attorneys for Plaintiff Capitol Records, LLC

By: 

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