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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CAPITOL RECORDS, LLC,

Plaintiff,

Civil Action No: 12 CIV 0095  
(RJS)

- against -

REDIGI, INC. ,

Defendant.

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**NOTICE OF MOTION**

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law dated July 27, 2012, the Declaration of Lawrence S. Rudolph (Rogel), dated July 27, 2012, with the exhibit annexed thereto and all prior proceedings had herein, Defendant ReDigi Inc. (“ReDigi”), 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, 500 Pearl Street, New York, New York 10007, for an order permitting the continued sealing of the following documents to be conditionally filed under seal by ReDigi and Plaintiff Capitol Records, LLC (“Capitol”) pursuant to the Court’s July 12, 2012 endorsed letter order:

- (1) Deposition Excerpts of Rudolph Rogel Deposition taken on June 18, 2012, attached to Capitol’s Motion for summary judgment;
- (2) Deposition Excerpts of Rudolph

Rogel Deposition taken on June 18, 2012, attached to ReDigi's Motion for summary judgment; (3) Deposition Excerpts of Ossenmacher Deposition, taken on June 19, 2012, attached to Capitol's Motion for summary judgment; (4) Deposition Excerpts of Ossenmacher Deposition, taken on June 19, 2012, attached to Redigi's Motion for summary judgment; (5) Exhibits "K", "L" and "M" attached to the Declaration of Richard Mandel in support of Capitol's Motion for summary judgment; (6) Capitol's 56.1 Statement of Uncontested Facts, attached to Plaintiff's Motion; (7) ReDigi's 56.1 Statement Of Uncontested Facts, attached to ReDigi's Motion; (8) Capitol's Memorandum of Law, dated July 20, 2012, in support of its motion for summary judgment; (9) ReDigi's Memorandum of Law, dated July 20, 2012 in support of its motion for summary judgment; (10). Declaration of Gary Adelman dated July 20, 2012, in support of ReDigi's Motion for summary judgment; (11) Declaration of Larry Rudolph (aka Lawrence S. Rogel), dated July 20, 2012, in support of the ReDigi Motion; (12) Declaration of Colin Worth, dated July 20, 2012, in support of the ReDigi Motion for summary judgment; and (13) Declaration of Jonathan Lin, dated July 20, 2012, in support of the ReDigi Motion for summary judgment, and such other and further relief as is just and proper.

**PLEASE TAKE FURTHER NOTICE**, that ReDigi respectfully requests that the Court hear oral argument as it may assist the Court, on a date and at a time designated by the Court.

Dated: New York, New York  
July 27, 2012

Respectfully submitted,

MEISTER SEELIG & FEIN LLP

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