

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CAPITOL RECORDS, LLC, :
 :
 Plaintiff, :
 :
 -against- :
 :
 REDIGI INC., :
 :
 Defendant. :
 :
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12 Civ. 0095 (RJS)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed Declaration of Mark Piibe, the accompanying Memorandum of Law in Support of Plaintiff’s Motion to Seal, and all prior proceedings had herein, Plaintiff Capitol Records, LLC hereby moves this Court, before the Honorable Richard J. Sullivan, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, for an order permitting the continued sealing of the following documents conditionally filed under seal, pursuant to the Court’s August 2, 2012 endorsed letter order, in connection with the parties’ pending cross-motions for summary judgment: (1) Exhibit 3 to the Declaration of Richard S. Mandel, Esq. in Opposition to Defendant’s Motion for Summary Judgment (Docket No. 74); (2) Plaintiff’s Memorandum of Law in Opposition to Defendant’s Motion for Summary Judgment (Docket No. 76); (3) Plaintiff’s Response to Defendant’s Statement of Undisputed Facts Pursuant to Local Rule 56.1 (Docket No. 78); (4) Memorandum of Law in Further Support of ReDigi’s Summary Judgment Motion (Docket No. 90); and (5)

Exhibit 1 to the Reply Declaration of Gary Adelman in Support of Defendant's Motion for
Summary Judgment (Docket No. 91).

Dated: New York, New York
August 29, 2012

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

By: 

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