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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 August 31, 2012, the Declaration of Lawrence S. Rudolph (Rogel), dated August 31, 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 August 2, 2012 endorsed letter order:

- (1) Deposition Excerpts of Rudolph Rogel Deposition taken on June 18, 2012, attached to the Declaration of Gary Adelman dated August 14, 2012 ("8/14/12 Adelman Decl.") as Exhibit 1;
- (2) Deposition Excerpts from the Ossenmacher Deposition taken on June 19, 2012, attached to

the 8/14/12 Adelman Declaration as Exhibit 2; (3) Deposition Excerpts from the Ossenmacher Deposition taken on June 19, 2012, attached to the Declaration of Richard Mandel dated August 9, 2012, as Exhibit 1; (4) the Declaration of Doug Jacobson dated August 9, 2012; (5) Capitol's Response to Defendant's Statement of Undisputed Facts Pursuant to Local Rule 5.61; (6) ReDigi's Counter Statement Pursuant to Local Rule 56.1; (7) Capitol's Memorandum of Law in Opposition to Defendant's Motion for Summary Judgment dated August 14, 2012; (8) Reply Memorandum of Law in Further Support of Plaintiff's Motion for Partial Summary Judgment dated August 24, 2012; (9) Reply Declaration of Richard Mandel dated August 21, 2012; (10) Exhibit 2 attached to the Reply Declaration of Richard Mandel dated August 21, 2012; (11) Memorandum of Law In Opposition to Capitol Records LLC's Motion for Partial Summary Judgment dated August 14, 2012; (12) Memorandum of Law in Further Support of ReDigi's Summary Judgment Motion dated August 24, 2012; (13) Declaration of Larry Rudolph In Support of Defendant's Opposition to Plaintiff's Motion for Summary Judgment dated August 14, 2012; and (14) Declaration of Larry Rudolph in Further Support of ReDigi's Motion for Summary Judgment dated August 23, 2012, 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.

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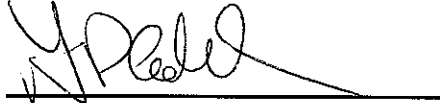
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Dated: New York, New York
August 31, 2012

Respectfully submitted,

MEISTER SEELIG & FEIN LLP



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