

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
IN NASHVILLE**

TAYLOR SWIFT,

Plaintiff

v.

MALCOLM MATTHEWS, RENEE SUSAN MITCHELL, LOUIS MOORE, MARTIN D. QUATTLEBAUM, MARSHA DYONNE TYLER, VARIOUS JOHN DOES, VARIOUS JANE DOES, and VARIOUS XYZ CORPORATIONS,

Defendants

Civil Action No. _____

**JURY DEMAND
FILED UNDER SEAL**

MOTION FOR ORDER TEMPORARILY SEALING FILE AND DOCKET SHEET

Plaintiff Taylor Swift (“Plaintiff”), by and through her undersigned counsel and upon her Verified Complaint and pursuant to the Trademark Counterfeiting Act of 1984, 15 U.S.C. § 1116(d) (“Act”), moves this Court for an Order directing the Clerk to temporarily seal the file, including the docket sheet, of this action pending execution by the United States Marshal or other authorized persons of the seizure order requested by Plaintiff in the case. Plaintiff has filed this action for, *inter alia*, remedies against Defendants’ use of counterfeit mark TAYLOR SWIFT in violation of the Act, and, as authorized by the Act, Plaintiff has applied to the Court for an order of seizure of counterfeit goods. In support of this Motion, Plaintiff respectfully shows that:

1. Sealing of this case is mandated by Section 1116(d) of Title 15 of the United States Code, which requires that “[a]n order under this subsection, together with the supporting documents, shall be sealed until the person against whom the order is directed has an opportunity to contest such order, except that any person against whom such order is issued shall have access to such order and supporting documents after the seizure has been carried out.”

2. In addition, the Act directs the Court to “take appropriate action to protect the person against whom an order under this subsection is directed from publicity, by or at the behest of the plaintiff, about such order and any seizure under such order.” 15 U.S.C. § 1116(d)(6). Thus, placing this case under seal is proper for protection of Defendants from publicity before they have an opportunity to respond to the seizure order.

3. Further, the Act requires that the requested seizure remain unpublicized, to prevent Defendants from learning of the existence of this action or any seizure order prior to its execution. 15 U.S.C. § 1116(d)(4)(B)(ii).

4. The material sought to be sealed is all filings in this case, as required by Section 1116(d) of Title 15 of the United States Code.

For the foregoing reasons, the file, including the docket sheet, of this action should be sealed, from the filing of the action and until at least the hearing on Plaintiff’s Application for Order of Seizure of Counterfeit Goods. A proposed Order Sealing Case and Docket Sheet accompanies this Motion, as Exhibit A.

Respectfully submitted,

Natalya L. Rose

W. Michael Milom (No. 002803)

David S. Crow (No. 020699)

Natalya L. Rose (No. 021701)

MILOM JOYCE HORSNELL CROW PLC

3310 West End Avenue, Suite 610

Nashville, Tennessee 37203

Telephone: (615) 255-6161

Facsimile: (615) 254-4490

mmilom@mjhc-law.com

dcrow@mjhc-law.com

nrose@mjhc-law.com

Attorneys for Plaintiff

Taylor Swift