



on a third party Internet Service Provider (“ISP”) to determine the true identity of the Doe Defendant, who is being sued for direct copyright infringement.

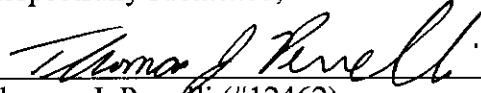
2. As alleged in the complaint, the Doe Defendant, without authorization, used an online media distribution system to download Plaintiffs’ copyrighted works, distribute copyrighted works to the public, and/or make copyrighted works available for distribution to others. Although Plaintiffs do not know the true name of the Doe Defendant, Plaintiffs have identified Defendant by a unique Internet Protocol (“IP”) address assigned to Defendant on the date and at the time of the Defendant's infringing activity.

3. Plaintiffs intend to serve a Rule 45 subpoena on the ISP seeking Defendant’s true name, address, telephone number, e-mail address, and Media Access Control (“MAC”) addresses. Without this information, Plaintiffs cannot identify the Doe Defendant or pursue their lawsuit to protect their copyrighted works from repeated infringement.

4. Good cause exists to allow Plaintiffs to conduct this limited discovery in advance of a Rule 26(f) conference where there is no known defendant with whom to confer.

WHEREFORE, Plaintiffs move this Court to issue an Order permitting Plaintiffs to conduct the foregoing requested discovery immediately.

Respectfully submitted,



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