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Of attorneys for plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

VOLTAGE PICTURES, LLC,

Plaintiff,

v.

DOES 1 – 371,

Defendants.

Case No.: 6:13-cv-00295-AA

PLAINTIFF'S MOTION TO ALLOW
SECOND AMENDED COMPLAINT;
(PROPOSED) SECOND AMENDED
COMPLAINT; (PROPOSED) EXHIBIT 1

Plaintiff certifies that it has conferred with counsel for Mary Havlicek, David Havlicek, Emily Orlando and Charles Foster who have filed answers, and these parties each oppose plaintiff's motion. Plaintiff has made good faith efforts to contact party G.R. Valleau, but has not been able to reach that party.

Plaintiff Voltage Pictures, LLC, moves this court for leave to allow its Second Amended Complaint, pursuant to Fed. R. Civ. Pro. 15(a)(2).

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Plaintiff's proposed Second Amended Complaint and proposed Exhibit 1 filed herewith.

DATED: April 20, 2013

Respectfully submitted,

CROWELL LAW

/s/Carl D. Crowell

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