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Attorney for John Doe #8

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

MALIBU MEDIA, LLC	)	Case No.: 2:12-cv-01260
	)	
Plaintiff,	)	Magistrate Judge John F. Moulds
	)	
vs.	)	NOTICE OF MOTION AND OMNIBUS
	)	MOTION FOR PROTECTIVE ORDER,
	)	MOTION TO SEVER, AND MOTION FOR
	)	RECONSIDERATION
	)	
JOHN DOES 1-13,	)	Date: September 6, 2012
	)	Time: 2:00 p.m.
Defendant	)	

TO ALL PARTIES AND THEIR ATTORNEY(S) OF RECORD:

YOU ARE HEREBY GIVEN NOTICE THAT on September 6, 2012 at 2:00 p.m. before Magistrate Judge John F. Moulds, at the United States District Court for the Eastern District of California, Sacramento Division, located at 501 I Street in Sacramento, CA 95814, John Doe #8 will and hereby does move for a protective order under Fed. Rule. Civ. P. 26(c) prohibiting Movant’s ISP from providing his identifying information to the Plaintiff. Movant further seeks a recommendation that the claims against Does 2-13 be severed due to misjoinder, and/or that this court vacate its prior order authorizing early discovery as to those Does.

This motion is made pursuant to Fed. R. Civ. P. 26 on the grounds specified in this notice of motion and motion, Movant’s Memorandum in Support of Protective Order, and any declarations and exhibits filed in support thereof.

1 Movant respectfully moves this court for an Order:

- 2 1) Prohibiting ISP AT&T from disclosing any of Movant's personally identifying  
3 information to the Plaintiff;
- 4 2) Recommending that the claims against John Does 2-13 be severed due to improper  
5 joinder;
- 6 3) Vacating this court's prior order authorizing early discovery; and
- 7 4) Granting such other and further relief to which Movant may be entitled.

8  
9 Respectfully Submitted,

August 7, 2012

10  
11       /s/ Nicholas Ranallo  
12 COUNSEL FOR JOHN DOE #8  
13 Nicholas Ranallo, Attorney at Law  
14 California Bar # 275016  
15 371 Dogwood Way,  
16 Boulder Creek, CA 95006  
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20  
21 **CERTIFICATE OF COMPLIANCE WITH FED.R.CIV.P. 26(C)(1) AND LOCAL RULE**

22 **251**

23 I have conference with counsel for the opposing party in a good faith effort to resolve the  
24 issues raised in this Motion and we were unable to agree on a resolution of the motion.

25  
26 By:       /s/Nicholas Ranallo  
27 Nicholas Ranallo

28 **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 7th day of August, a true and correct copy of the  
foregoing was filed with the Clerk of the Court using the CM/ECF system and served on all of  
those parties receiving notification through the CM/ECF system.

By:       /s/Nicholas Ranallo  
Nicholas Ranallo