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Attorney for John Does 14 & 32

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

MALIBU MEDIA, LLC	)	Case No.: 1:12-cv-00888-AWI-DLB
	)	
Plaintiff,	)	Magistrate Judge Dennis L. Beck
	)	
vs.	)	NOTICE OF MOTION AND MOTION FOR
	)	PROTECTIVE ORDER
JOHN DOES 1-59,	)	
	)	
Defendant	)	Date: August 17, 2012
	)	Time: 9:00 A.M.
	)	Courtroom #9 – Sixth Floor

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

YOU ARE HEREBY GIVEN NOTICE THAT on August 17, 2012 at 9:00 a.m. before Magistrate Judge Dennis L. Beck, at the United States District Court for the Eastern District of California, Fresno Division, located at 2500 Tulare Street, Fresno, CA 93721 in Courtroom 9, Sixth Floor, the ISP subscribers associated with IP addresses 98.224.125.211 & 24.7.173.114 will and hereby do move for a protective order under Fed. Rule. Civ. P. 26(c) prohibiting Movant’s ISP from providing their identifying information to the Plaintiff. Movants further seek a recommendation that the claims against Does 2-59 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 Comcast Communication from disclosing any of Movants' personally  
3 identifying information to the Plaintiff;
- 4 2) Recommending that the claims against John Does 2-59 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,

July 19, 2012

10  
11       /s/ Nicholas Ranallo  
12 COUNSEL FOR MOVANTS  
13 (IP ADDRESSES 98.224.125.211 & 24.7.173.114)  
14 Nicholas Ranallo, Attorney at Law  
15 California Bar # 275016  
16 371 Dogwood Way,  
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21  
22 **CERTIFICATE OF COMPLIANCE WITH FED.R.CIV.P. 26(C)(1) AND LOCAL RULE**

23  
24 **251**

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

27  
28 By:       /s/Nicholas Ranallo  
Nicholas Ranallo

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 19<sup>th</sup> day of July, 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