

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

PATRICK COLLINS, INC.,

Plaintiff,

v.

DOES 1 – 79,

Defendants.

Civil Action No.: 1:12-cv-10532

**Renewed Motion for Early
Discovery**

The plaintiff respectfully requests that the Court allow it to take early discovery in the present lawsuit for the sole purpose of identifying all Defendants to be named in the Complaint by subpoenaing the subscribers respective Internet Service Providers (“ISPs”). Moreover, pursuant to the Cable Privacy Act, 47 U.S.C. § 551(c)(2)(B), Plaintiff further seeks a Court order directing the ISPs to disclose the subscriber’s personally identifiable information. Plaintiff requests that this motion be decided on an emergency basis as the ISPs only keep the records that Plaintiff requires to identify the Defendants for a limited period of time. Essential information will be irrecoverably lost unless Plaintiff is allowed to serve a valid subpoena immediately. In support of this motion, Plaintiff relies on the accompanying memorandum.

Respectfully submitted on September 10, 2012,

FOR THE PLAINTIFF:



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CERTIFICATE OF SERVICE

I hereby certify that on September 10, 2012, the foregoing document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing, and paper copies will be served via first-class mail to those indicated as non-registered participants.



Marvin Cable, Esq.