

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

PATRICK COLLINS, INC.,

Plaintiff,

v.

JOHN DOES 1-58,

Defendants.

CASE NO. 3:11-cv-00531-JAG

MOTION FOR LEAVE TO FILE *AMICUS CURIAE* BRIEF

Steele Hansmeier PLLC (öSteele Hansmeierö) hereby moves for leave to file an *amicus curiae* brief in response to the Court's October 5, 2011 Memorandum Order in *K-Beech, Inc. v. John Does 1-85*, No. 3:11-cv-00469-JAG (E.D. Va. Oct. 5, 2011) ECF No. 9. In support of this motion, Steele Hansmeier states:

1. Steele Hansmeier is a law firm that is heavily involved in defending the rights of copyright holders against the veritable tidal wave of digital infringement that, if left unchecked, represents an existential threat to the for-profit creative arts sector of the United States economy.
2. Steele Hansmeier was the counsel of record in the BitTorrent copyright infringement cases cited by the Court in support of its severance decision.
3. As counsel of record in dozens of cases in which Courts nationwide have upheld joinder at the early-discovery stage of the litigation, Steele Hansmeier believes that it can offer a non-duplicative supplement to the response filed by Plaintiff's counsel in this matter that will aid the Court's decision-making process.

4. Steele Hansmeier has no relationship to Plaintiff, Plaintiff's counsel and has not discussed or otherwise coordinated this filing with any party of interest in this litigation.

Respectfully Submitted,

DATED: October 17, 2011

By: /s/ Timothy V. Anderson
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