THE COPYRIGHT LAW GROUP, P.L.L.C.

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May 15, 2012

The Honorable

Katherine B. Forrest

RE:

U.S. District Court for the Southern District of New In Re Adult Film Copyright Infringement Litigation HERINE Master Case No. 11 Civ. 7564.

Dear Judge Forrest:

The Court has made it clear that the privacy of the John Does must be protected as much as possible.

However, I need to serve individual Does in several of the consolidated cases (I will file Rule 4 extensions where no or few names have been received from the ISPs).

Usually, one would file a Motion to Amend the Complaint and list the true name of the John Doe.

Can you please let me know if the following is an acceptable procedure for amending the complaints to list individual Defendants in the consolidated cases?

- (1) I could file the Motion to Amend the Complaint without using the name of the individual defendant.
- (2) I can black out the name of the individual defendant in the proposed Amended Complaint that I attach to the Motion.
- (3) Once I have served the individual defendant, I would not use the individual Defendant's name until he has filed an answer or a motion.

Would that be an acceptable procedure? Thank you for your time and consideration!

Sincerely,

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Mike Meier, The Copyright Law Group, PLLC, 4000 Legato Road, Suite 1100, Fairfax, VA 22033, Phone: (888) 407-6770, Fax: (703) 546-4990