



in favor of non-disclosure of the identities of these unknown Defendants. Third, disclosure of the ISP account holders does not necessarily identify the alleged copyright offender. Forth, the Cable Privacy Act may not apply to both ISP's contained in the Plaintiff's motion. Finally, Doe Defendants hereby join in sections "C" and "D" of the memorandum [Doc.12] filed in support of Third Party Internet Service Provider AT&T's ("AT&T") response to Plaintiff's Motion for Expedited Discovery.

2. Alternatively, if the Court deems it appropriate to grant Plaintiff's motion under Rule 45, the Doe Defendants request this Court to require that Plaintiff produce its documentation tracking the alleged infringing activity and order discovery remain sealed until the infringing user has been positively identified. Furthermore, absent any legal authority, Plaintiff's request for multi-stage discovery (i.e. depositions, interrogatories, and document requests) should be denied.

Respectfully submitted this the 9<sup>th</sup> day of October, 2012.

JOHN/JANE DOES 1-2, Defendants

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**CERTIFICATE OF SERVICE**

I, PAUL CHINICHE, Attorney *At Litem* for the Defendants, hereby certify that this day I have served a true and correct copy of the above and foregoing pleading upon the following counsel via electronic means using the ECF system:

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SO CERTIFIED this the 9th day of October, 2012.

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