

1 Marc J. Randazza, Esq., SBN 269535  
2 Randazza Legal Group  
3 3969 Fourth Avenue, Suite 204  
4 San Diego, CA 92103  
5 888-667-1113  
6 305-437-7662 (fax)  
7 [MJR@randazza.com](mailto:MJR@randazza.com)

8 Attorney for Plaintiff,  
9 LIBERTY MEDIA HOLDINGS, LLC

10 UNITED STATES DISTRICT COURT

11 SOUTHERN DISTRICT OF CALIFORNIA, SAN DIEGO DIVISION

12 LIBERTY MEDIA HOLDINGS, LLC ) Case No. 10-CV-1823-DMS-WVG

13 Plaintiff, )  
14 vs. ) **NOTICE OF MOTION AND SECOND**  
15 ) **MOTION FOR ORDER ALLOWING**  
16 ) **PLAINTIFF LEAVE TO TAKE**  
17 ) **IMMEDIATE DISCOVERY**

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DOES 2, 3, DOES 7-9, CARLOS  
MANCERA (formerly Doe 10), DOE 13,  
JOHN JOHN (formerly Doe 15), DOES 21-  
22, DOES 33-35, 37-40; FRED MARTINEZ  
(formerly Doe 41); ADELINE AUGUSTIN  
(formerly Doe 54);  
Defendants

19 Plaintiff Liberty Media Holdings respectfully requests that the Court issue an Order 21  
20 granting leave to take immediate discovery. Plaintiff could not obtain stipulation for this motion 22  
21 because Plaintiff cannot identify the Doe Defendants until the requested discovery takes place. 23  
22 Plaintiff seeks this order so that it may obtain the identities of certain Doe Defendants. This Motion  
23 is based upon the attached Memorandum of Points and Authorities.

24 Date: March 7, 2011. s/ Marc Randazza  
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**CERTIFICATE OF SERVICE**

The undersigned does certify that the foregoing document was filed using the Court’s CM/ECF system on March 7, 2011. Plaintiff served the named defendants via U.S. Mail. As Plaintiff is unable to identify the remaining Doe Defendants, Plaintiff is unable to serve them

s/ Marc Randazza  
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