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Attorney for Plaintiff,  
LIBERTY MEDIA HOLDINGS, LLC

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

LIBERTY MEDIA HOLDINGS, LLC

Plaintiff,

vs.

SHENG GAN f/k/a PROTECTED DOMAIN  
SERVICES CUSTOMER NCR-3356109  
d/b/a SITERIPKING.COM and JOHN DOES  
2-10

Defendant.

Case No. 1:11-cv-02754-MSK-KMT

**NOTICE OF MOTION AND MOTION TO  
WITHDRAW AS ATTORNEY OF RECORD**

Marc J. Randazza hereby requests to withdraw from this case with respect to his representation of Liberty Media Holdings, LLC. Liberty has instructed Marc J. Randazza to cease action in this case. Liberty retained the firm Greenberg Traurig LLP, which took over representation on other Liberty matters, and then Liberty replaced Greenberg Traurig with Brownstein Hyatt for all pending matters. Since this instruction, Liberty has declined to communicate with Marc J.

Randazza about this case. Marc J. Randazza advised Liberty's other counsel on multiple occasions about pending deadlines and a need to substitute in on this case, but has received no response. Without client approval to act, Marc J. Randazza cannot continue to represent Liberty in this case and requests that the Court allow him to withdraw as counsel of record. In order to preserve Liberty's rights, Liberty should be given at least thirty (30) days in which to name substitute counsel in this action.

Dated: November 30, 2012

Respectfully submitted,

s/ Marc J. Randazza  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that no service is required of the foregoing, as no party other party has made an appearance in this action.

s/ Marc J. Randazza