

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

LIBERTY MEDIA HOLDINGS, LLC

Plaintiff

v.

Civil Action No. 11-cv-10802-WGY

SWARM SHARING HASH FILE
AE340D0560129AFEE8D78CEO7F2394C7B
5BC9C05; AND DOES 1 through 38,

Defendants

DEPONENT'S EMERGENCY MOTION FOR STAY OF DEPOSITION

Jeffrey Menard ("Deponent") hereby files this motion for a stay of deposition, pending resolution of the accompanying Deponent's Emergency Motion for Protective Order.

Plaintiff mailed to Deponent's counsel a Notice of Taking Deposition dated October 7, 2011, identifying the Deponent by his real name ("Notice")(Exhibit) and demanding his attendance at a deposition on October 24, 2011 and demanding that Deponent produce certain documents at said deposition.

Deponent files contemporaneously with this Motion for Stay a Motion for Protective Order, incorporated by reference, outlining reasons why Deponent should not be subjected to a deposition at this time.

WHEREFORE, Plaintiff respectfully requests that this Court issue an Order, staying the deposition scheduled for October 24, 2011, until such time as the Court has issued a decision on Deponent's Motion for Protective Order.

Northampton, Massachusetts
October 19, 2011



Peter Irvine
Mass. BBO #656538
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CERTIFICATE OF SERVICE

I hereby certify that the attached Motion, together with all documentary exhibits, filed through the ECF system was sent electronically to the registered participants as identified on the Notice of Electronic Filing at the time of filing.

CERTIFICATION RE LOCAL RULE 7.1

I hereby certify that I conferred with plaintiff's counsel on the subject of this Motion and attempted in good faith to resolve or narrow the issue.



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