UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT
OF NEW YORK

NEW SENSATIONS, INC. 21345 Lassen St. Chatsworth, CA 91311	)	
Plaintiff,	)	
v.	)	Civil Action No. 12-cv-1168-AKH
DOES 1 – 52	)	
Defendants.	)	

MOTION FOR LEAVE TO TAKE DISCOVERY
PRIOR TO RULE 26(f) CONFERENCE

Plaintiff, by and through counsel, pursuant to the Federal Rules of Civil Procedure, respectfully requests this Court for leave to take discovery prior to the Rule 26(f) conference, as explained the accompanying Memorandum of Points and Authorities, filed contemporaneously herewith. The reasons are that (1) the Defendants cannot be identified without information from their respective Internet Service Providers (ISPs), and (2) such ISPs have limited retention periods for the relevant records.

Respectfully submitted this 22nd day of February, 2012.

FOR THE PLAINTIFF:

By: /s/ Mike Meier

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