

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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PEARSON EDUCATION, INC., :
JOHN WILEY & SONS, INC., :
CENGAGE LEARNING INC. AND :
THE MCGRAW-HILL COMPANIES, INC., :

Plaintiffs,

-against-

07 Civ. 8028 (CM)

JOHN DOE D/B/A LPE BOOKSTORE :
D/B/A KBS AND JOHN DOES :
NOS. 1-5, :

Defendants.

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PLAINTIFFS' EX PARTE APPLICATION FOR AN
ORDER ALLOWING SERVICE ON DEFENDANTS BY E-MAIL
AND U.S. MAIL AND AUTHORIZING THE ISSUANCE
OF SUBPOENAS TO DETERMINE THE IDENTITIES
AND LOCATIONS OF DEFENDANTS

Plaintiffs hereby move pursuant to Rules 4(e)(1)
and 26(d) of the Federal Rules of Civil Procedure for an
order (i) allowing service by e-mail and mail of the
summons and complaint on defendant John Doe d/b/a LPE
Bookstore d/b/a KBS, and (ii) authorizing plaintiffs to
serve subpoenas on AbeBooks Inc., Google Inc., PayPal, Inc.
and eBay, Inc. to determine the identities and locations of
defendants, which are presently unknown to plaintiffs.

The basis for this application is set forth in the accompanying declaration of William Dunnegan, sworn to October 2, 2007.

A proposed order is annexed.

Dated: New York, New York
October 2, 2007

DUNNEGAN LLC

By 

William Dunnegan (WD9316)

Megan L. Martin (MM4396)

Attorneys for Plaintiffs

Pearson Education, Inc.,

John Wiley & Sons, Inc.,

Cengage Learning Inc., and

The McGraw-Hill Companies, Inc.

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