

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHER DISTRICT OF ILLINOIS, EASTERN DIVISION

VISION FILMS, INC.,)	
A California Corporation)	
)	
<i>Plaintiff,</i>)	Case No. 13-cv-65
)	
v.)	
JOHN DOES 1-63)	JURY TRIAL DEMANDED
<i>Defendants</i>)	

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

Plaintiff, Vision Films, by and through its attorney Matthew Lee Stone of the law firm Schneider & Stone, LLP, pursuant to the Federal Rules of Civil Procedure, respectfully moves this Court for leave to take discovery prior to the Rule 26(f) conference for the reasons stated in its accompanying Memorandum of Law filed contemporaneously herewith.

In particular, Plaintiff seeks the issuance of subpoenas under Rule 45 to the Internet Service Providers (“ISPs”) who provided internet services to any of the Doe Defendants identified by an Internet Protocol (“IP”) address in Exhibit B to the attached Memorandum of Law to obtain information sufficient to identify each Doe Defendant by name, current and permanent addresses, telephone number, email address and Media Access control number.

Respectfully submitted,

/s/ Matthew Lee Stone /s/
One of Attorneys for Plaintiff

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