

Nicholas Ranallo, Attorney at Law (SBN #275016)
371 Dogwood Way
Boulder Creek, CA 95006
Phone: (831) 703-4011
Fax: (831) 533-5073
nick@ranallolawoffice.com

Attorney for ISP Subscriber 71.95.203.190

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION**

| | | |
|---------------------|---|---------------------------------|
| CP PRODUCTIONS, INC |) | Case No.: 2:12-cv-00616-WBS-JFM |
| |) | |
| Plaintiff, |) | Magistrate Judge John F. Moulds |
| |) | |
| vs. |) | NOTICE OF MOTION AND MOTION FOR |
| |) | PROTECTIVE ORDER |
| JOHN DOE, |) | |
| |) | |
| Defendant |) | Date: July 5, 2012 |
| |) | Time: 2:00 p.m. |
| |) | 8 th Floor Courtroom |

TO ALL PARTIES AND THEIR ATTORNEY(S) OF RECORD:

YOU ARE HEREBY GIVEN NOTICE THAT on July 5, 2012 at 11:00 a.m. before Magistrate Judge John F. Moulds, at the United States District Court for the Eastern District of California, Sacramento Division, located at 501 I Street in Sacramento, CA 95814, Movant associated with IP address 71.95.203.190 will and hereby does move for a protective order under Fed. Rule. Civ. P. 26(c) prohibiting Movant's ISP from providing his identifying information to the Plaintiff.

This motion for protective order is made pursuant to Fed. R. Civ. P. 26(c) on the grounds specified in this notice of motion and motion, Movant's Memorandum in Support of Protective Order, incorporated into this notice of motion and motion, and any declarations and exhibits filed in support thereof.

Movant respectfully moves this court for an Order:

- 1) Prohibiting ISP Charter Communication from disclosing any of movant's personally identifying information to the Plaintiff;
- 2) Dismissing this case in its entirety, permitting the Plaintiff, if it so chooses, to re-file against the Defendant and/or each "co-conspirator" IP address in a separate lawsuit, subject to the restraints of venue; and
- 3) Granting such other and further relief to which Movant may be entitled.

Respectfully Submitted,

 /s/ Nicholas Ranallo
COUNSEL FOR MOVANT (IP ADDRESS 174.66.128.247)
Nicholas Ranallo, Attorney at Law
California Bar # 275016
371 Dogwood Way,
Boulder Creek, CA 95006
(831) 703-4011
Fax: (831) 533-5073
nick@ranallolawoffice.com

CERTIFICATE OF COMPLIANCE WITH FED.R.CIV.P. 26(C)(1) AND LOCAL RULE

251

I have conference with counsel for the opposing party in a good faith effort to resolve the issues raised in this Motion and we were unable to agree on a resolution of the motion.

By: /s/Nicholas Ranallo
Nicholas Ranallo

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 25th day of May, 2012, a true and correct copy of the foregoing was filed with the Clerk of the Court using the CM/ECF system and served on all of those parties receiving notification through the CM/ECF system.

By: /s/Nicholas Ranallo
Nicholas Ranallo