

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MCGIP, LLC	)	
	)	CASE NO.: 10 cv 6677
Plaintiff,	)	
	)	
v.	)	Judge: Hon. Virginia M. Kendall
	)	
DOES 1 – 316	)	
	)	
Defendants.	)	
	)	
	)	
	)	
	)	

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**MOTION TO STRIKE**

1. On January 31, 2011, attorney Steven Murra, on behalf of an anonymous nonparty filed a Motion to Quash Subpoena and Opposition of Defendant to Subpoena Directed to Verizon to Disclose Identity, Produce Documents, Information, or Objects or To Permit Inspection of Premises in a Civil Action was filed (Doc. #27).

2. On February 9, 2011, another nonparty, Paromita Ghosh, filed a pleading titled “Objection to Disclosure of Internet Protocol Address” (Doc. #30).

3. On February 15, 2011, another nonparty, Jason J. Kim, filed his Motion to Quash (Doc. #31), Motion to Dismiss (Doc. #33), and Motion for Protective Order (Doc. #34).

4. On February 28, 2011, attorney Steven Murra, on behalf of an anonymous nonparty filed a Motion to Quash Subpoena and Opposition of Defendant to Subpoena Directed to Verizon to Disclose Identity, Produce Documents, Information, or Objects or To Permit Inspection of Premises in a Civil Action was filed (Doc. #35).

5. The Local Rules of the United States District Court for the Northern District of Illinois require every motion to be accompanied by a notice of presentment specifying the date

and time on which the motion or objection is to be presented. L.R. 5.3(b). None of the previously mentioned motions were accompanied by a notice of presentment.

8. In addition, attorney Murra, in his Motion for Leave to Appear Pro Hac Vice filed January 31, 2011 (Doc. #27) and his Motion for Leave to Appear Pro Hac Vice filed February 28, 2011 (Doc. #35), attested that he had reviewed this Court's local rules and swore under penalty of perjury that he would adhere to the same.

9. This Court has previously exercised its discretion to strike various Movants' motions from the record for not being properly noticed before the Court (Doc. #28).

**PRAYER**

**WHEREFORE**, Plaintiff respectfully requests the Court to exercise its discretion and strike the Motion to Quash (Doc. #27), Objection to Disclosure (Doc. #30), Motion to Quash (Doc. #31), Motion to Dismiss (Doc. #33), Motion for Protective Order (Doc. #34), and the Motion to Quash (Doc. #35) from the record and provide such further relief as the Court deems appropriate.

Respectfully submitted,

MCGIP, LLC

**DATED:** March 1, 2011

By: /s/ John Steele  
John L. Steele (Bar No. 6292158)  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on March 1, 2011, all counsel of record who are deemed to have consented to electronic service are being served a true and correct copy of the foregoing document using the Court's CM/ECF system, in compliance with Local Rule 5.2(a). Service by first class mail was made to the following:

Paromita Ghosh  
1219 Polo Lake Dr.  
Ellisville, MO 63021

Jason J. Kim  
97 Gladwin Ave.  
Leonia, NJ 07605

/s/ John Steele  
JOHN STEELE