

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ELEKTRA ENTERTAINMENT GROUP INC., a Delaware :
corporation; VIRGIN RECORDS AMERICA, INC., a
California corporation, UMG RECORDINGS, INC., :
a Delaware corporation; BMG Music, a New York general
partnership; and SONY BMG MUSIC ENTERTAINMENT, :
a Delaware general partnership,

Plaintiffs,

: Case No. 05CV2414 (CM)(MDF)

-against-

:

PATRICIA SANTANGELO,

:

Defendant.

:

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NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the annexed declaration of Richard L. Gabriel, Esq., the accompanying Memorandum of Law, and all prior papers and proceedings herein, the undersigned will move before the Honorable Colleen McMahon, United States District Judge for the United States District Court for the Southern District of New York, United States Courthouse, 300 Quarropas Street, Room 533, White Plains, New York 10601-4150, for an Order, pursuant to Fed. R. Civ. P. 41(a)(2), dismissing their claims against defendant without prejudice.

PLEASE TAKE FURTHER NOTICE that, pursuant to Judge McMahon's individual practices, answering papers or motions are to be served two (2) weeks after receipt of the moving papers, and reply papers, if any, are to be served five (5) business days later. Unless opposing affidavits and memoranda of law are timely served, the relief sought herein may be granted.

DATED: Denver, Colorado
December 19, 2006

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