

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UMG RECORDINGS, INC., et al.,

05 CV 1095 (DGT)(RML)

Plaintiffs,

- against

MARIE LINDOR,

Defendant
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NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the annexed declaration of Richard L. Gabriel, Esq., the exhibits attached thereto, the declarations of Dr. Doug Jacobson, Ph. D., CFCE, Azzam N. Abderrahman, Alvin D. Gonzalez, the accompanying Memorandum of Law, and all prior papers and proceedings herein, the undersigned will move before the Honorable Robert M. Levy, United States Magistrate Judge for the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201, to compel Woody Raymond to comply with the subpoena duces tecum that was served on him on November 7, 2006.

PLEASE TAKE FURTHER NOTICE that, pursuant to this Court's Order, dated December 1, 2006, opposing affidavits and memoranda of law, if any, must be served on or before January 16, 2007, and reply memoranda, if any, must be served on or before January 30, 2007. Unless opposing affidavits and memoranda of law are timely served, the relief sought herein may be granted.

AND PLEASE TAKE FURTHER NOTICE that undersigned counsel hereby certifies that he has conferred in good faith with counsel for defendant and for Mr. Raymond regarding this motion and that the parties have been unable to resolve this dispute.

DATED: Denver, Colorado
December 20, 2006

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