

LAVAN LAW
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Attorney for Defendant John Doe

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

OPENMIND SOLUTIONS, INC.,	:	
	:	
Plaintiff	:	
	:	
vs.	:	CIVIL ACTION NO. 1:11-CV-01883-JMF
	:	
JOHN DOES 1-565,	:	NOTICE OF MOTION TO QUASH
	:	SUBPOENA AND SEVER
Defendants.	:	DEFENDANTS
	:	
	:	ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that Defendant, John Doe (identified in this action by the IP address 68.34.160.207) (hereafter “Defendant”), by and through his counsel, hereby moves the Court for an order:

1. Quashing Plaintiff’s subpoena to Comcast Cable Holdings, LLC;
2. Preventing the release of Defendant’s personal identifying information; and
3. Severing John Does 2-565.

PLEASE TAKE FURTHER NOTICE that Defendant hereby requests oral argument on this motion.

In support of this motion, Defendant submits the accompanying memorandum of law. A proposed form of order is attached.

Respectfully submitted,

s/ Julie A. LaVan

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Dated: January 11, 2012

STATEMENT PURSUANT TO LOCAL CIVIL RULE 7(m)

Pursuant to Local Civil Rule 7(m), Defendant's counsel has contacted Plaintiff's counsel in a good faith effort to resolve this discovery dispute. Plaintiff's counsel and Defendant's counsel discussed this motion. Plaintiff has indicated its opposition to this motion.

s/ Julie A. LaVan

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CERTIFICATE OF SERVICE

I, Julie A. LaVan, hereby certify that I caused this motion to be served upon Plaintiff's counsel by ECF filing and regular mail at the following address:

Paul A. Duffy, Esq.
Law Offices of Paul Duffy
2 N. LaSalle Street
13th Floor
Chicago, IL 60602

s/ Julie A. LaVan

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