

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

PACIFIC CENTURY INTERNATIONAL
LTD,

CASE NO. 1:11-cv-09064

Plaintiff,

v.

Judge: Hon. Harry D. Leinenweber
Magistrate Judge: Hon. Morton Denlow

DOES 1 – 31,

Defendants.

**PLAINTIFF’S MOTION FOR LEAVE TO TAKE DISCOVERY
PRIOR TO THE RULE 26(f) CONFERENCE**

Plaintiff, Pacific Century International LTD, through its undersigned counsel, hereby moves this Court *ex parte* for an Order granting limited discovery prior to the Rule 26(f) Conference. This motion is based upon the case record, attached memorandum and authorities cited therein, and the attached Declaration of Peter Hansmeier. Plaintiff seeks to issue subpoenas pursuant to Fed. R. Civ. P. 45 limited to the following categories of entities and information:

From Internet Service Providers (ISPs) identified in the Exhibit A attached to the Complaint and any other entity identified as a provider of Internet services to one of the Doe Defendants in response to a subpoena or as a result of ongoing BitTorrent activity monitoring: information sufficient to identify each Defendant, including name, current (and permanent) address, telephone number, e-mail address, and Media Access Control address.

Any information disclosed to the Plaintiff in response to a Rule 45 subpoena will be used by the Plaintiff solely for the purpose of protecting Plaintiff’s rights as set forth in its Complaint.

For all the reasons articulated in the attached memorandum, Plaintiff respectfully asks the Court to grant this motion.

Respectfully submitted,

Pacific Century International LTD

DATED: December 22, 2011

By: By: /s/ Paul Duffy
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