UNITED STATES	S DISTRICT COURT	ENTERED RECEIVED	
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PATRICK COLLINS, INC. DBA ELEGANT ANGEL 8015 Deering Ave Canoga Park, CA 91304	AT GREENBE CLERK, U.S. DISTRIC DISTRICT OF MAR )	ELT ET COURT M YLAND DEPUT	
Plaintiff,	PJN 12 CV 8350		
v.	Civil Action No.		
DOES 1 – 70			
Defendants.			

## MOTION FOR LEAVE TO TAKE DISCOVERY PRIOR TO RULE 26(f) CONFERENCE

Plaintiff, by and through counsel, pursuant to the Federal Rules of Civil Procedure, respectfully requests this Court for leave to take discovery prior to the Rule 26(f) conference, as explained the accompanying Memorandum of Points and Authorities, filed contemporaneously herewith. The reasons are that (1) the Defendants cannot be identified without information from their respective Internet Service Providers (ISPs), and (2) such ISPs have limited retention periods for the relevant records.

Respectfully submitted this 31st day of January, 2012.

By: \_/s/ Mike Meier

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