

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT INDIANA**

MALIBU MEDIA, LLC,	)	
	)	
Plaintiff,	)	Civil Case No. <u>1:13-cv-00205-WTL-MJD</u>
	)	
v.	)	
	)	
KELLEY TASHIRO,	)	
	)	
Defendant.	)	
	)	

**PLAINTIFF’S MOTION FOR LEAVE TO FILE ITS  
MOTION FOR ENTRY OF A PROTECTIVE ORDER UNDER SEAL**

Plaintiff, Malibu Media, LLC (“Plaintiff”), moves for entry of an order to file its Motion for Entry of a Protective Order (“Motion”) in its entirety, and portions of its Response to Defendant’s Motion to Bar IPP’s Testimony (“Response”) under seal and states:

1. To explain its good cause basis for seeking a protective order, Plaintiff set forth information which *cannot* be disclosed to third parties. The only way to evaluate this contention is to read the paper which speaks for itself. Plaintiff is confident that the Court will agree it should remain sealed.

2. Plaintiff seeks to file its Motion for Entry of a Protective Order entirely under seal.

3. Plaintiff will file its Motion immediately upon the entry of an order allowing it to be filed under seal.

4. Good cause exists to grant this motion.

WHEREFORE, Plaintiff respectfully requests that the Court permit Plaintiff to file portions of its responses under seal. A proposed order is attached for the Court’s convenience.

Dated: February 12, 2014

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 12, 2014, a true and correct copy of the foregoing document was served via U.S. Mail and/or email to the following:

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