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June 27, 2014

FILED VIA CM/ECF

The Honorable Ellen Lipton Hollander
The Honorable J. Frederick Motz
The Honorable William D. Quarles
United States District Court
for the District of Maryland
101 W. Lombard Street
Baltimore, Maryland 21201

RE: *Malibu Media, LLC v. John Doe subscriber assigned IP address 98.218.21.63*
Case No.: 1:13-cv-03438-ELH
Malibu Media, LLC v. John Doe subscriber assigned IP address 69.136.226.144
Case No.: 1:14-cv-00758-JFM
Malibu Media, LLC v. John Doe subscriber assigned IP address 108.3.135.114
Case No.: 1:14-cv-00222-WDQ
Malibu Media, LLC v. John Doe subscriber assigned IP address 69.140.170.247
Case No.: 8:14-cv-01222-RWT

Dear Judges Hollander, Motz, and Quarles:

On June 13, 2014, on behalf of this Firm's separate clients who are named as Subscriber Defendants in the above-referenced cases, undersigned counsel filed concurrently in four different cases a Motion to Stay Case and Outstanding ISP Subpoena Pending Resolution of Similarly Situated Litigation (collectively, the "Motions to Stay"). The Motions to Stay seek the same exact relief, namely, that the Court stay the case(s) and the respective subpoenas issued to the Internet Service Provider until resolution is reached on the pending Procedural Motion, OSC Motion, and Motion to Strike (as defined in each Motion to Stay) in the Similarly Situated

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Litigation.¹ The Motions pending in the Similarly Situated Litigation have been set in for a hearing before Judges Titus, Grimm, and Garbis on July 30, 2014, at 2:15 p.m.

In the interests of judicial efficiency and continuity, undersigned counsel writes to respectfully inform the Court in each of the above-referenced cases that, on June 24, 2014, the Honorable Roger W. Titus granted undersigned counsel's Motion to Stay in Case No. 8:14-cv-01222-RWT. *See* June 24, 2014 Order [ECF 10 therein], a copy of which is attached hereto as **Exhibit A**.

Thank you very much for your time with respect to these matters.

Respectfully submitted,

Anne J. McKenna / SGF

Anne T. McKenna

ATM/sgf
Attachment

cc: The Hon. Roger W. Titus (*via* CM/ECF in Case No. 8:14-cv-01222-RWT)
Jon A. Hoppe, Esq. (*served via* CM/ECF in all cases)
The Hon. Paul W. Grimm (*via* First Class U.S. Mail)
The Hon. Marvin J. Garbis (*via* First Class U.S. Mail)

¹ As detailed in the Motions to Stay, on or about March 28, 2014, in a similarly situated litigation commenced by Malibu Media in this Court, Case No. 1:14-cv-00223-MJG (the "Similarly Situated Litigation"), a yet-unidentified Doe Defendant ISP subscriber filed a Motion to: (1) Intervene Anonymously; (2) Consolidate Malibu Media Cases; and (3) Temporarily Stay Outstanding Subpoenas. Contemporaneously therewith, the Doe Defendant ISP subscriber filed a Motion for an Order to Show Cause as to Why All Evidence and Data from Tobias Fieser and His Company IPP Should Not Be Precluded and These [Malibu Media copyright] Cases Dismissed. In addition to, and in support of, the foregoing Procedural and OSC Motions, the Doe Defendant ISP subscriber also filed the Declaration of Morgan E. Pietz re: IPP, Guardaley, and the "Oral Contingency Agreement" Malibu Media, LLC Had With Its Key Witness. In response, on or about April 28, 2014, Malibu Media filed a Motion to Strike the Pietz Declaration in the Similarly Situated Litigation. Counsel in the Similarly Situated Litigation only recently completed briefing the matters raised in the Procedural Motion, the OSC Motion, and Malibu Media's Motion to Strike.