

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

COMBAT ZONE CORP.
1880 Century Park E Ste 200
Los Angeles, CA 90067

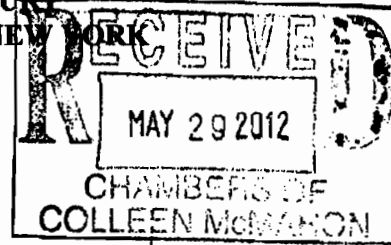
Plaintiff,

v.

DOES 1 - 34

Defendants.

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 5/30/12



Civil Action No. 12-cv-04133-CM

ECF CASE

**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 15th day of May, 2012.

MEMO ENDORSED

FOR THE PLAINTIFF:

Waiver
By: /s/ Mike Meier
Mike Meier (NY9295)
The Copyright Law Group, PLLC
4000 Legato Road, Suite 1100
Fairfax, VA 22033
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Fax: (703) 546-4990
Email: mike.meier.esq@copyrightdefenselawyer.com

ATTORNEY FOR PLAINTIFF

*5/29/2012
Motion denied.
Show cause why these
defendants should be
joined, in view of this
Court's opinion in
D. Patel Sim v. John Doe.
In the absence of cause shown
including clear showing
that there is personal
subject matter
jurisdiction
over each
defendant -
the court
will serve
and dismiss
without prejudice
as to all defendants
except John Doe #1!
C. [Signature]
VSD*

*Please note that
understand that
"aggregation" data requirement is not sufficient
Sued in District Court & the propriety of grounds
& do not present jurisdiction*