

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

MALIBU MEDIA, LLC,	)	
	)	
Plaintiff,	)	Civil Case No.: <u>1:13-cv-06312</u>
	)	
v.	)	Assigned to:
	)	Honorable Geraldine Soat Brown
JOHN DOE subscriber assigned IP address	)	U.S. District Judge
24.14.81.195,	)	
	)	
Defendant.	)	
	)	

**PLAINTIFF’S MOTION FOR LEAVE TO FILE THE ATTACHED NOTICE ADVISING  
THAT RECORD EXPERT EVIDENCE FROM PATRICK PAIGE EXPLAINS PCAP  
COMPUTER FILES**

To fully address the Court’s concern that expert testimony is necessary to explain PCAPs and IPP’s detection system, Plaintiff moves for the entry of an order permitting it to file the attached notice, which identifies the paragraphs of Mr. Paige's timely disclosed expert reports that explain what a PCAP computer file is and how it is used by IPP. His original report did this in connection with his test of IPP's infringement detection system. And, these explanations are the foundation of Mr. Paige's opinion that IPP's system works.

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**NOTICE**

Please take notice that Mr. Paige's timely submitted expert reports explain what a PCAP is and how it is used by IPP and Plaintiff to correlate an IP Address to a subscriber of Internet services. This information was included in Mr. Paige's January 9, 2015 original report, as well as, his April 17, 2015 and April 20, 2015 supplements. See [CM/ECF 161-1], at ¶¶ 24-37; 51-55; [CM/CF 148-13], at ¶¶ 24-37; 51-55; [CM/ECF 152-2], at ¶¶ 24-37; 51-55.

DATED: June 18, 2015

Respectfully submitted,

By: /s/ M. Keith Lipscomb  
M. Keith Lipscomb (429554)  
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Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 18, 2015, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and that service was perfected on all counsel of record and interested parties through this system.

By: /s/ M. Keith Lipscomb