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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON**

ELF-MAN, LLC,

Plaintiff,

vs.

RYAN LAMBERSON,

Defendant.

No. 2:13-CV-00395-TOR

DEFENDANT’S MEMORANDUM
OF SUPPORT OF THE CENTER
FOR JUSTICE’S MOTION TO
INTERVINE

Date: November 30, 2017

Time: 6:30 p.m.

Without Oral Argument

Defendant Ryan Lamberson, by and through his counsel and assignee Lee & Hayes PLLC, submits this Memorandum in Support of the Center For Justice’s (“CFJ”) Motion to Intervene for the Limited Purpose of Challenging the Sealing of Records, ECF No. 114.

1 Counsel for Mr. Lamberson executed the Protective Order, ECF No. 32, and
2 consented to its entry at the request of counsel for Elf-Man LLC (“Elf-Man”). Lynch
3 Dec.¹ at ¶3.

4 Sealed documents ECF Nos. 39-1, 39-2, 43-5, 43-6, 51-2, and 65-2 were
5 submitted into the record by counsel for Mr. Lamberson. Lynch Dec. at ¶¶4-6.

6 Sealed document ECF No. 85-2 was submitted by former counsel for Elf-Man
7 (who had withdrawn when the sealed document was submitted). Lynch Dec. at ¶7.
8 Mr. Lamberson previously challenged the authenticity of the sealed document. ECF
9 No. 98.

10 The concerns CFJ raises about the illicit nature of copyright trolling in the
11 United States District Courts are valid. Lynch Dec. at ¶¶2-34. CFJ is in a unique
12 position to shine light on documents sealed in this case which has unrecognized
13 significance in the scheme of Bit Torrent litigation across U.S. District Courts.

14 Defendant Lamberson does not oppose CFJ’s Motion.

15 RESPECTFULLY SUBMITTED this 14th day of November, 2017.

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¹ Declaration of J. Christopher Lynch Re: ECF Nos. 114 and 116 (“Lynch Dec.”)

CERTIFICATE OF SERVICE

1
2 I hereby certify that on the 14th day of November, 2017, I caused to be filed
3 the foregoing with the Clerk of the Court using the CM/ECF system, which in turn
4 automatically generated a Notice of Electronic Filing (NEF) to all parties in the case
5 who are registered users of the CM/ECF system. The NEF for the foregoing
6 specifically identifies recipients of electronic notice.

7
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