

**EXHIBIT A**

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CAPITOL RECORDS, INC. et al.,  
Plaintiffs,

v.

NOOR ALAUJAN,  
Defendant.

Civ. Act. No. 03-cv-11661-NG  
(LEAD DOCKET NUMBER)

SONY BMG MUSIC ENTERTAINMENT  
et al., Plaintiffs,

v.

JOEL TENENBAUM,  
Defendants.

Civ. Act. No 07-cv-11446-NG  
(ORIGINAL DOCKET NUMBER)

**PLAINTIFFS' REQUEST FOR INSPECTION**

TO: Defendant Joel Tenenbaum, through his attorney of record  
Charles Nesson  
1575 Massachusetts Ave.  
Cambridge, MA 02138

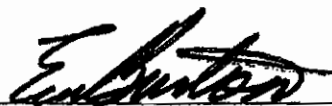
Pursuant to Rule 34, and the parties' agreement regarding scheduling, Plaintiffs hereby request inspection and copying on October 10, 2008 at 9:00 a.m. of (1) the Gateway desktop computer owned by Defendant and (2) the Toshiba laptop computer owned by Defendant, as referenced by Defendant in his deposition in this matter. Unless a response and/or objection is received in advance, the inspection and copying will take place at the offices of Charles Nesson, Griswold Hall 501, 1575 Massachusetts Ave., Cambridge, MA 02138 on October 10, 2008 at 9:00 a.m.

At that time, a certified computer forensics technician will make two verified bit-image (i.e., mirror image copy) of each of the computer hard drives or other digital storage devices and will create an MD5 or equivalent hash code to ensure that Defendant's original hard drives are not altered and to ensure that the copy of Defendant's hard drives are exact duplicates of Defendant's original hard drives.

Pursuant to the parties agreement, you must respond to this Request for Inspection, in writing, on or before October 10, 2008.

Dated: October 2, 2008

Respectfully submitted,



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Eve G. Burton  
Holme Roberts & Owen LLP  
1700 Lincoln Street, Suite 4100  
Denver, Colorado 80203  
Email: eve.burton@hro.com  
Telephone: 303-861-7000

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 2<sup>nd</sup> day of October 2008, a true and correct copy of the foregoing PLAINTIFFS' REQUEST FOR INSPECTION was forwarded by electronic mail, and was placed in the United States mail, first-class postage prepaid and addressed to the following:

Mr. Charles Nesson  
1575 Massachusetts Ave.  
Cambridge, MA 02138  
email: nesson@gmail.com



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**EXHIBIT B**



hash code to ensure that Defendant's original hard drives are not altered and to ensure that the copies of Defendant's hard drives are exact duplicates of Defendant's original hard drives.

3. Both copies of the computer hard drives shall be held by the imaging expert (the "Escrowed Images"). By October 10, 2008, Defendant shall provide Plaintiffs with a privilege log of all files on Defendant's hard drives alleged to contain privileged information. The parties shall meet and confer to resolve any disputes over Defendant's claims of privilege by October 15, 2008. After resolution of any disputes concerning Defendant's assertions of privilege, Plaintiffs shall have access to one Escrowed Image of the hard drives, minus the files as to which privilege has been asserted, in order to conduct a forensic inspection for information relevant to the parties' claims and defenses.

4. A copy of the mirror image and hash code signature will be provided to Defendant's counsel, upon request, at Defendant's expense.

5. Plaintiffs' computer forensic expert may designate assistants ("Assistants") to help complete the forensic inspection of Defendant's hard drives.

6. No one aside from Plaintiffs' legal counsel (including such counsel's partners, associates, and employees working on this matter), Plaintiffs' expert (including Assistants), the Court, and qualified court reporters shall have access to the information on Defendant's computer, and the information on Defendant's computer shall be kept confidential and be used only for purposes of this lawsuit.

7. After final resolution of this case, including all appeals, Plaintiffs shall destroy all images of Defendant's hard drives and shall confirm such destruction to the satisfaction Defendant.

IT IS SO ORDERED THIS \_\_\_ DAY OF \_\_\_\_\_, 2008:

\_\_\_\_\_  
United States District Judge



UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
CAPITOL RECORDS, INC. et al.,	)	
	)	Civ. Act. No. 03-cv-11661-NG
Plaintiffs,	)	(LEAD DOCKET NUMBER)
	)	
v.	)	
	)	
NOOR ALAUJAN,	)	
	)	
Defendant.	)	
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	)	
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SONY BMG MUSIC ENTERTAINMENT, et al.	)	
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Plaintiffs,	)	(ORIGINAL DOCKET NUMBER)
	)	
v.	)	
	)	
JOEL TENENBAUM	)	
	)	
Defendant.	)	
_____	)	

**DEFENDANT'S PROPOSED PROTECTIVE ORDER**

In connection with the Plaintiffs' Request for Production pursuant to Fed. R. Civ. P. 34(b), the Court hereby ORDERS as follows:

1. The Plaintiffs shall make specific request with regard to the type and nature of information sought to be obtained from Defendant through the Request for Production;

2. The Plaintiffs shall specifically state the relevance of such information to the current action brought by Plaintiffs, and how such information is reasonably calculated to lead to discovery of admissible evidence;
3. The Plaintiffs shall specifically show how such information has not been provided by Defendant;
4. The Plaintiffs shall specifically show how such information cannot be obtained through alternative means which impose less burden and expense upon Defendant;
5. The parties shall in good faith work together to take such steps to ensure that such information is provided to Plaintiffs.

Dated: October 9, 2008