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Hon. David G. Trager  
United States District Judge  
United States District Court for  
the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: UMG Recordings, Inc. et al. v. Lindor  
EDNY No. 05 Civ. 1095 (DGT) (RML)  
BLH File No. 700000.18702

Dear Judge Trager:

We are the attorneys for the defendant Marie Lindor. We respectfully request a pre-motion conference in order to make a summary judgment motion dismissing the complaint, and for attorneys fees under the Copyright Act. Ms. Lindor is a home health aide who not only never "downloaded, distributed, or made available for distribution" any files, but has never purchased, used, or even turned on, a computer, in her life. Thank you.

Respectfully yours,



Morlan Ty Rogers

cc: Maryann E. Penney Esq. (by fax)