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April 13, 2007

Via Electronic Filing

The Honorable Terry L. Sheahan
Clerk of Court
United States District Court, Charleston Division
85 Broad Street
Charleston, SC 29402

RE: Trademark Properties and Richard C. Davis v. A&E Television Networks and Max Weissman Productions, Inc. d/b/a Departure Films
USDC Civil Action No.: 2:06-CV-2195-CWH
Our File No.: 28692/01500
Chubb File No. 133228

Dear Mr. Sheahan:

Please find attached for filing (1) a public version of defendants' Motion for Summary Judgment and (2) a public version of defendants' Memorandum in Support of Motion for Summary Judgment. We ask that these documents, together with this letter, be added to the non-confidential public docket in this case.

These documents originally were filed under seal on April 2. On the enclosed public versions, the words "CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER" have been removed from the first page of each document. One sentence has been redacted on page 13 of the public version of the Memorandum. Otherwise, the public versions are identical to the sealed versions.

Please apply the original April 2 filing date to the enclosed documents. Plaintiffs' opposition due date should not change.

On April 2, we also filed under seal the Declaration of Robert H. Jordan with exhibits. To be clear, the Jordan declaration and exhibits should remain under seal.

The background of this request is set out in the exchange of correspondence with plaintiffs' counsel that is appended to this letter.

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Thank you very much for your assistance with this matter.

Respectfully submitted,

NELSON MULLINS RILEY & SCARBOROUGH, LLP

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Charleston, South Carolina

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