

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE: NETFLIX PRIVACY LITIGATION,

)
) Case No. 5:11-cv-00379-EJD
)
)
) Honorable Edward J. Davila
)
)
) ***MOTION FOR LEAVE TO FILE***
) ***ADDITIONAL MEMORANDUM***
) ***REGARDING DEFENSE***
) ***COUNSEL'S SUPPLEMENTAL***
) ***SUBMISSION OF CY PRES***
) ***RECIPIENTS***
)

Name of Objector: Matthew D. Tanner
Address: 53 West Jackson Boulevard, Suite 400
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Objector, Matthew Tanner hereby moves this Court for leave to file a supplemental memorandum regarding the Wilson Sononi firm's recent disclosure of relationships to several of the Settlement's *cy pres* recipients. (*See* Dkt. 237). Because this information was not disclosed before the deadline for objections, neither Objector Tanner nor other objectors received a full and fair opportunity to comment on the impropriety of these recently disclosed relationships.

Accordingly, Objector Tanner respectfully asks this Court for leave to file an additional short memorandum limited to the scope Wilson Sononi's disclosure. If the Court requires the filing of a *pro hac vice* motion, we ask that it be permitted without fee or personal designation of local counsel, which would create a new hurdle for objectors. Although the \$275 *pro hac vice* filing fee is not a large amount, objectors do not choose the forum and should not have to pay to assert their objections.

Respectfully submitted,

Dated: December 20, 2012

/s/ Clinton A. Krislov
Attorney for Objector, Matthew Tanner

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