

**UNITED STATES COURT OF APPEALS  
FOR THE FIRST CIRCUIT**

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No. 10-2173

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SAMUEL BARTLEY STEELE; BART STEELE PUBLISHING; STEELE RECORDZ,

*Plaintiffs-Appellants,*

v.

VECTOR MANAGEMENT; MLB ADVANCED MEDIA, L.P.,

*Appellees.*

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THE AMERICAN SOCIETY OF COMPOSERS; FOX TELEVISION STATIONS, INC.;  
ISLAND RECORDS, a/k/a Island Def Jam Records; THE BIGGER PICTURE CINEMA CO.;  
TURNER BROADCASTING SYSTEM, INC.; TIME WARNER, INC.; JON BONGIOVI,  
individually and d/b/a Bon Jovi Publishing; RICHARD SAMBORA, individually and d/b/a  
Aggressive Music; WILLIAM FALCONE, individually and d/b/a Pretty Blue Songs; FOX  
BROADCASTING COMPANY; MAJOR LEAGUE BASEBALL PROPERTIES, INC.; MLB  
PRODUCTIONS, A&E; A & E/AETV; BON JOVI; AEG LIVE, LLC; MARK SHIMMEL  
MUSIC; AGGRESSIVE MUSIC, a/k/a Sony ATV Tunes; BON JOVI PUBLISHING;  
UNIVERSAL MUSIC PUBLISHING GROUP; UNIVERSAL POLYGRAM  
INTERNATIONAL PUBLISHING, INC.; PRETTY BLUE SONGS; SONY ATV TUNES;  
KOBALT MUSIC PUBLISHING AMERICA, INC.; BOSTON RED SOX,

*Defendants.*

ON APPEAL FROM THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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**MOTION TO WITHDRAW**

Pursuant to Local Rule 12(b), I, Scott D. Brown, an attorney who has  
appeared for Appellee MLB Advanced Media, L.P. in the above-captioned civil

appeal, respectfully request the Court's consent to withdraw my appearance. As grounds for this request, I state as follows:

1. As of the close of business on June 17, 2011, I will cease my employment with the law firm of Skadden, Arps, Slate, Meagher & Flom LLP, counsel for MLB Advanced Media, L.P. in the above-captioned civil appeal.

2. Attorneys Clifford M. Sloan, Matthew J. Matule and Christopher G. Clark have appeared for and continue to represent MLB Advanced Media, L.P. in this appeal.

Dated: June 17, 2011  
Boston, Massachusetts

Respectfully submitted,

/s/ Scott D. Brown  
Scott D. Brown (1st Cir. No. 109415)  
SKADDEN, ARPS, SLATE,  
MEAGHER & FLOM LLP  
One Beacon Street  
Boston, Massachusetts 02108  
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Counsel for Appellee  
MLB Advanced Media, L.P.

**CERTIFICATE OF SERVICE**

I, Scott D. Brown, hereby certify that on June 17, 2011 I electronically filed the foregoing document with the United States Court of Appeals for the First Circuit by using the CM/ECF system. I certify that the following parties or their counsel of record are registered as ECF Filers and that they will be served by the CM/ECF system: Christopher A.D. Hunt, The Hunt Law Firm LLC, 10 Heron Lane, Hopedale, Massachusetts 01747, cadhunt@earthlink.net, counsel of record for Plaintiffs-Appellants Samuel Bartley Steele, Bart Steele Publishing, and Steele Recordz and Jeremy P. Oczek, Proskauer Rose LLP, One International Place, 22nd Floor, Boston, Massachusetts 02110, joczek@proskauer.com, counsel of record for Appellee Vector Management, LLC.

Dated: June 17, 2011

/s/ Scott D. Brown  
Scott D. Brown