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FILED
CLERK, U.S. DISTRICT COURT
NOV - 9 2006
CENTRAL DISTRICT OF CALIFORNIA
BY

17 Attorneys for Plaintiffs
18 ECHOSTAR SATELLITE CORP. et al.

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19 UNITED STATES DISTRICT COURT
20 CENTRAL DISTRICT OF CALIFORNIA
21 SOUTHERN DIVISION

22 ECHOSTAR SATELLITE
23 CORP., et al.,

24 Plaintiffs /
25 Counterclaim
26 Defendants

No. SA CV 03-950 DOC (JTLx)

District Judge:
Hon. David O. Carter

Courtroom 9D

v.

27 NDS GROUP PLC, NDS
28 AMERICAS, INC., et. al.,

Defendants /
Counterclaim
Plaintiffs.

**[PROPOSED] ORDER FOR
ISSUANCE OF LETTER
ROGATORY**

Re: Andre Sergei, 144 Avenue at
Corner of 133A Street, Surrey, British
Columbia, Canada, or elsewhere in
British Columbia

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CLERK, U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY

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1 1. The Application of Plaintiffs for an order for the issuance of a letter
2 rogatory to take the deposition of Andre Sergei came on for ruling before this Court
3 this the 9th day of November, 2006. The Court being fully advised, good cause
4 appearing therefore, and due notice having been given, finds that Andre Sergei
5 resides abroad and is a necessary and material witness in the above-entitled action.

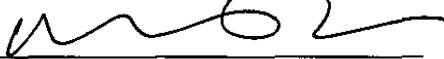
6 IT IS ORDERED THAT:

7
8 2. A letter rogatory issue under the seal of this Court authorizing the
9 taking of deposition of Andre Sergei whose address is 114 Avenue at Corner of
10 133A Street, Surrey, British Columbia, Canada or elsewhere in British Columbia,
11 under oath or affirmation upon oral examination and requesting the assistance of
12 the appropriate judicial authority in British Columbia, Canada to compel his
13 attendance. Counsel for either party may appear and participate at the oral
14 deposition, if they so chose, by telephone, videoconference, or other electronic
15 means, provided proper notice is effected and the party makes the arrangements and
16 pays for the expenses incurred for the appearance.

17 DATED: November 9, 2006

18 
19 _____
United States Magistrate Judge

20 Respectfully Submitted By,
21 T. WADE WELCH & ASSOCIATES

22 By:  DATED: November 9, 2006
23 Joseph H. Boyle (*pro hac vice*)
24 Chad M. Hagan (*pro hac vice*)

25 Cynthia A. Ricketts (*pro hac vice*)
26 Michael T. Purleski
27 SQUIRE, SANDERS & DEMPSEY L.L.P.

28 Attorneys for Plaintiffs ECHOSTAR SATELLITE CORPORATION,

1 ECHOSTAR COMMUNICATIONS CORPORATION, ECHOSTAR
2 TECHNOLOGIES CORPORATION, AND NAGRASTAR L.L.C.

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PROOF OF SERVICE BY MAIL

I am a citizen of the United States and employed in Los Angeles County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 555 South Flower St., 31st Floor, Los Angeles, California 90071-2300. I am readily familiar with this firm's practice for collection and processing of correspondence for mailing with the United States Postal Service.

On November 7, 2006, I served the foregoing document, described as:

[PROPOSED] ORDER FOR ISSUANCE OF LETTER ROGATORY

Re: Andre Sergei, 144 Avenue at Corner of 133A Street, Surrey, British Columbia, Canada, or elsewhere in British Columbia

in a sealed envelope, postage fully paid, addressed as follows:

SEE ATTACHED SERVICE LIST

By U.S. Mail, According to Normal Business Practice. On this date, I sealed the above document(s) in an envelope addressed to the above, and I placed that sealed envelope for collection and mailing following ordinary business practices, for deposit with the U.S. Postal Service. I am readily familiar with the business practice at my place of business for the collection and processing of correspondence for mailing with the U.S. Postal Service. Correspondence so collected and processed is deposited the U.S. Postal Service the same day in the ordinary course of business, postage fully prepaid.

By personal delivery by Beverly Hills Express Attorney Services of the document(s) listed above to the person(s) at the address(es) set forth above.

By Facsimile. On this date, I transmitted the above-mentioned document(s) by facsimile transmission machine to the parties and facsimile number set forth above.

By Federal Express Service Carrier. On this date, I sealed the above document(s) in an envelope or package designated by Federal Express, an express service carrier, addressed to the above, and I deposited that sealed envelope or package in a box or other facility regularly maintained by the express service carrier, or delivered that envelope to an authorized courier or driver authorized by the express service carrier to receive documents, located in Los Angeles, California with delivery fees paid or otherwise provided for.

By Electronic Mail Transmission With Attachment. On this date, I transmitted the above-mentioned document(s) by electronic mail transmission with attachment to the parties at the electronic mail transmission address set forth below.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on November 7, 2006, at Los Angeles, California.



Vicki Scott

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SERVICE LIST

EchoStar Satellite Corporation, et al. v. NDS Group PLC, et al.
United States District Court, Central District of California, Southern Division
Case No. SA CV 03-0950 DOC (ANx)

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Via U.S. Mail

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Counsel for Non-Parties
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Internet Crimes Group, Inc.

Via Federal Express