

1:05-cv-03771-MBM Maverick Recording Company et al v. Does 1 - 25

Michael B. Mukasey, presiding

Date filed: 04/13/2005 Date of last filing: 04/14/2005

Case Summary

Office: Foley Square	Filed: 04/13/2005
Jury Demand: None	Demand:
Nature of Suit: 820	Cause: 17:501 Copyright Infringement
Jurisdiction: Federal Question	Disposition:
County: XX Out of State	Terminated:
Origin: 1	Reopened:
Lead Case:	None
Related Case:	None
Def Custody Status:	Other Court Case: None
Flag: ECF	

Plaintiff Maverick Recording Company	represented by J. Christopher Jensen	Phone: (212) 790-9200 Fax: (212) 575-0671 Email: jcj@cll.com
Plaintiff Caroline Records, Inc.	represented by J. Christopher Jensen	Phone: (212) 790-9200 Fax: (212) 575-0671 Email: jcj@cll.com
Plaintiff Motown Record Company, L.P.	represented by J. Christopher Jensen	Phone: (212) 790-9200 Fax: (212) 575-0671 Email: jcj@cll.com
Plaintiff Elektra Entertainment Group Inc.	represented by J. Christopher Jensen	Phone: (212) 790-9200 Fax: (212) 575-0671 Email: jcj@cll.com
Plaintiff Arista Records LLC	represented by J. Christopher Jensen	Phone: (212) 790-9200 Fax: (212) 575-0671 Email: jcj@cll.com
Plaintiff Warner Bros. Records Inc.	represented by J. Christopher Jensen	Phone: (212) 790-9200 Fax: (212) 575-0671 Email: jcj@cll.com
Plaintiff Atlantic Recording Corporation	represented by J. Christopher Jensen	Phone: (212) 790-9200 Fax: (212) 575-0671 Email: jcj@cll.com
Plaintiff Interscope Records	represented by J. Christopher Jensen	Phone: (212) 790-9200 Fax: (212) 575-0671 Email: jcj@cll.com
Plaintiff Virgin Records America, Inc.	represented by J. Christopher Jensen	Phone: (212) 790-9200 Fax: (212) 575-0671 Email: jcj@cll.com
Plaintiff BMG Music	represented by J. Christopher Jensen	Phone: (212) 790-9200 Fax: (212) 575-0671 Email: jcj@cll.com
Plaintiff UMG Recordings, Inc.	represented by J. Christopher Jensen	Phone: (212) 790-9200 Fax: (212) 575-0671 Email: jcj@cll.com
Plaintiff Capitol Records, Inc.	represented by J. Christopher Jensen	Phone: (212) 790-9200 Fax: (212) 575-0671 Email: jcj@cll.com
Plaintiff Priority Records LLC	represented by J. Christopher Jensen	Phone: (212) 790-9200 Fax: (212) 575-0671 Email: jcj@cll.com
Plaintiff Sony BMG Music Entertainment	represented by J. Christopher Jensen	Phone: (212) 790-9200 Fax: (212) 575-0671 Email: jcj@cll.com
Defendant Does 1 - 25		

PACER Service Center			
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04/21/2005 14:14:07			
PACER Login:	gg0358	Client Code:	
Description:	Case Summary	Search Criteria:	1:05-cv-03771-MBM
Billable Pages:	1	Cost:	0.08

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MAVERICK RECORDING COMPANY, a
California joint venture; CAROLINE RECORDS,
INC., a New York corporation; MOTOWN
RECORD COMPANY, L.P., a California limited
partnership; ELEKTRA ENTERTAINMENT
GROUP INC., a Delaware corporation; ARISTA
RECORDS LLC, a Delaware limited liability
company; WARNER BROS. RECORDS INC., a
Delaware corporation; ATLANTIC RECORDING
CORPORATION, a Delaware corporation;
INTERSCOPE RECORDS, a California general
partnership; VIRGIN RECORDS AMERICA,
INC., a California corporation; BMG MUSIC, a
New York general partnership; UMG
RECORDINGS, INC., a Delaware corporation;
CAPITOL RECORDS, INC., a Delaware
corporation; PRIORITY RECORDS LLC, a
California limited liability company; and SONY
BMG MUSIC ENTERTAINMENT, a Delaware
general partnership,

Plaintiffs,

-against-

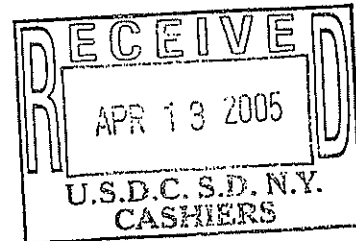
DOES 1 - 25,

Defendants.

JUDGE MUKASEY

Civil Action No.:

05 CV 3771



COMPLAINT FOR COPYRIGHT INFRINGEMENT

Plaintiffs, by their attorneys, for their complaint against Defendants, allege:

JURISDICTION AND VENUE

1. This is a civil action seeking damages and injunctive relief for copyright infringement under the copyright laws of the United States (17 U.S.C. § 101 *et seq.*).

2. This Court has jurisdiction under 17 U.S.C. § 101 *et seq.*; 28 U.S.C. § 1331 (federal question); and 28 U.S.C. § 1338(a) (copyright).

3. Venue in this District is proper under 28 U.S.C. § 1391(b) and/or 28 U.S.C. § 1400(a). Although the true identity of each Defendant is unknown to Plaintiffs at this time, on information and belief, each Defendant may be found in this District and/or a substantial part of the acts of infringement complained of herein occurred in this District. On information and belief, personal jurisdiction in this District is proper because each Defendant, without consent or permission of the copyright owner, disseminated over the Internet copyrighted works owned and/or controlled by the Plaintiffs. On information and belief, such illegal dissemination occurred in every jurisdiction in the United States, including this one. In addition, each Defendant uses an online service provider found in this District to access the Internet, which facilitated Defendants' infringing activities.

PARTIES

4. Plaintiff Maverick Recording Company is a joint venture between Maverick Records and Warner Bros. Records Inc., organized and existing under the laws of the State of California, with its principal place of business in the State of California.

5. Plaintiff Caroline Records, Inc. is a corporation duly organized and existing under the laws of the State of New York, with its principal place of business in New York.

6. Plaintiff Motown Record Company, L.P. is a limited partnership duly organized and existing under the laws of the State of California, with its principal place of business in the State of New York.

7. Plaintiff Elektra Entertainment Group Inc. is a corporation duly organized and existing under the laws of the State of Delaware, with its principal place of business in the State of New York.

8. Plaintiff Arista Records LLC is a limited liability company duly organized and existing under the laws of the State of Delaware, with its principal place of business in the State of New York.

9. Plaintiff Warner Bros. Records Inc. is a corporation duly organized and existing under the laws of the State of Delaware, with its principal place of business in the State of California.

10. Plaintiff Atlantic Recording Corporation is a corporation duly organized and existing under the laws of the State of Delaware, with its principal place of business in the State of New York.

11. Plaintiff Interscope Records is a California general partnership, with its principal place of business in the State of California.

12. Plaintiff Virgin Records America, Inc. is a corporation duly organized and existing under the laws of the State of California, with its principal place of business in the State of New York.

13. Plaintiff BMG Music is a general partnership duly organized and existing under the laws of the State of New York, with its principal place of business in the State of New York.

14. Plaintiff UMG Recordings, Inc. is a corporation duly organized and existing under the laws of the State of Delaware, with its principal place of business in the State of California.

15. Plaintiff Capitol Records, Inc. is a corporation duly organized and existing under the laws of the State of Delaware, with its principal place of business in the State of New York.

16. Plaintiff Priority Records LLC is a limited liability company with its principal place of business in the State of California.

17. Plaintiff Sony BMG Music Entertainment is a Delaware general partnership, with its principal place of business in the State of New York.

18. The true names and capacities of the Defendants are unknown to Plaintiffs at this time. Each Defendant is known to Plaintiffs only by the Internet Protocol ("IP") address assigned to that Defendant by his or her online service provider on the date and time at which the infringing activity of each Defendant was observed. See Exhibit A. Plaintiffs believe that information obtained in discovery will lead to the identification of each Defendant's true name.

COUNT I
INFRINGEMENT OF COPYRIGHTS

19. Plaintiffs incorporate herein by this reference each and every allegation contained in each paragraph above.

20. Plaintiffs are, and at all relevant times have been, the copyright owners or licensees of exclusive rights under United States copyright law with respect to certain copyrighted sound recordings, including, but not limited to, all of the copyrighted sound recordings on Exhibit A to this Complaint (collectively, these copyrighted sound recordings shall be identified as the "Copyrighted Recordings"). Each of the Copyrighted Recordings is the subject of a valid Certificate of Copyright Registration issued by the Register of Copyrights to each Plaintiff as specified on each page of Exhibit A.

21. Among the exclusive rights granted to each Plaintiff under the Copyright Act are the exclusive rights to reproduce the Copyrighted Recordings and to distribute the Copyrighted Recordings to the public.

22. Plaintiffs are informed and believe that each Defendant, without the permission or consent of Plaintiffs, has used, and continues to use, an online media distribution system to download, distribute to the public, and/or make available for distribution to others, certain of the Copyrighted Recordings. Exhibit A identifies on a Defendant-by-Defendant basis (one Defendant per page) a list of copyrighted recordings that each Defendant has, without the permission or consent of Plaintiffs, downloaded, distributed to the public, and/or made available for distribution to others. In doing so, each Defendant has violated Plaintiffs' exclusive rights of

reproduction and distribution. Each Defendant's actions constitute infringement of Plaintiffs' copyrights and/or exclusive rights under copyright. (In addition to the sound recordings listed for each Defendant on Exhibit A, Plaintiffs are informed and believe that each Defendant has, without the permission or consent of Plaintiffs, downloaded, distributed to the public, and/or made available for distribution to others additional sound recordings owned by or exclusively licensed to the Plaintiffs or Plaintiffs' affiliate record labels.)

23. Plaintiffs are informed and believe that the foregoing acts of infringement have been willful, intentional, and in disregard of and with indifference to the rights of Plaintiffs.

24. As a result of each Defendant's infringement of Plaintiffs' copyrights and exclusive rights under copyright, Plaintiffs are entitled to statutory damages pursuant to 17 U.S.C. § 504(c) against each Defendant for each infringement by the Defendant of each copyrighted recording. Plaintiffs further are entitled to their attorneys' fees and costs pursuant to 17 U.S.C. § 505.

25. The conduct of each Defendant is causing and, unless enjoined and restrained by this Court, will continue to cause Plaintiffs great and irreparable injury that cannot fully be compensated or measured in money. Plaintiffs have no adequate remedy at law. Pursuant to 17 U.S.C. §§ 502 and 503, Plaintiffs are entitled to injunctive relief prohibiting each Defendant from further infringing Plaintiffs' copyrights, and ordering that each Defendant destroy all copies of copyrighted sound recordings made in violation of Plaintiffs' exclusive rights.

WHEREFORE, Plaintiffs pray for judgment against each Defendant as follows:

1. For an injunction providing:

"Defendant shall be and hereby is enjoined from directly or indirectly infringing Plaintiffs' rights under federal or state law in the Copyrighted Recordings and any sound recording, whether now in existence or later created, that is owned or controlled by Plaintiffs (or any parent, subsidiary, or affiliate record label of Plaintiffs) ("Plaintiffs' Recordings"), including without limitation by using the Internet or any online media distribution system to reproduce (*i.e.*, download) any of Plaintiffs' Recordings, to distribute (*i.e.*, upload) any of Plaintiffs' Recordings, or to make any of Plaintiffs' Recordings available for distribution to the public, except pursuant to a lawful license or with the express authority of Plaintiffs. Defendant also shall destroy all copies of Plaintiffs' Recordings that Defendant has downloaded onto any computer hard drive or server without Plaintiffs' authorization and shall destroy all copies of those downloaded recordings transferred onto any physical medium or device in Defendant's possession, custody, or control."

2. For statutory damages for each infringement of each Copyrighted Recording pursuant to 17 U.S.C. § 504.

3. For Plaintiffs' costs in this action.

4. For Plaintiffs' reasonable attorneys' fees incurred herein.
5. For such other and further relief as the Court may deem just and proper.

Dated: New York, New York

April 12, 2005

Attorneys for Plaintiffs

By: 

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Exhibit A

Doe #1 (160.39.225.213 2005-03-05 07:47:03 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Sony BMG Music Entertainment	Blue Oyster Cult	Burnin' For You	Fire of Unknown Origin	29-371
Sony BMG Music Entertainment	Journey	Don't Stop Believin'	Escape	30-088
UMG Recordings, Inc.	Godsmack	Keep Away	Godsmack	241-879

Exhibit A

Doe #2 (160.39.194.8 2005-03-06 10:53:37 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Priority Records LLC	Snoop Dogg	Gin & Juice II	Da Game Is To Be Sold, Not To Be Told	260-056
Arista Records LLC	Usher	You Make Me Wanna	My Way	257-730
Elektra Entertainment Group Inc.	Das EFX	They Want Efx	Dead Serious	140-245
Sony BMG Music Entertainment	Incubus	I Miss You	Make Yourself	278-818
Sony BMG Music Entertainment	Bruce Springsteen	Secret Garden	Greatest Hits	198-948

Exhibit A

Doe #3 (160.39.181.64 2005-03-07 13:52:53 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
UMG Recordings, Inc.	U2	God Part II	Rattle & Hum	99-818
Warner Bros. Records Inc.	Red Hot Chili Peppers	This Velvet Glove	Californication	174-922
Arista Records LLC	Outkast	Millennium	Atliens	233-296
Warner Bros. Records Inc.	Red Hot Chili Peppers	Around The World	Californication	174-922
Interscope Records	Dr. Dre	Big Ego's	2001	277-983

Exhibit A

Doe #4 (160.39.232.105 2005-03-05 00:21:18 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Arista Records LLC	Usher	U Don't Have to Call	8701	307-207
Elektra Entertainment Group Inc.	Missy Elliot	Beep Me 911	Supa Dupa Fly	245-232
Virgin Records America, Inc.	Beenie Man	Love Me Now	Art And Life	284-383
Interscope Records	Eve	Let Me Blow Ya Mind	Scorpion	293-364

Exhibit A

Doe #5 (160.39.232.107 2005-03-05 12:58:51 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
BMG Music	Busta Rhymes	Break Ya Neck	Genesis	312-547
Sony BMG Music Entertainment	Sade	Cherish The Day	Love Deluxe	183-731
Sony BMG Music Entertainment	Incubus	Deep Inside	SCIENCE	249-690
Elektra Entertainment Group Inc.	Brand Nubian	Punks Jump Up to Get Beat Down	In God We Trust	152-095
UMG Recordings, Inc.	Musiq	Halfcrazy	Juslisen	308-859

Exhibit A

Doe #6 (160.39.177.47 2005-03-05 22:42:01 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Interscope Records	Mya	It's All About Me	Mya	255-973
BMG Music	Tyrese	I Like Them Girls	2000 Watts	293-345
Atlantic Recording Corporation	Jewel	Foolish Games	Pieces of You	198-481
UMG Recordings, Inc.	Rob Zombie	Living Dead Girl	Hellbilly Deluxe	257-901

Exhibit A

Doe #7 (160.39.224.28 2005-03-07 05:44:55 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Sony BMG Music Entertainment	Incubus	Glass	SCIENCE	249-690
Elektra Entertainment Group Inc.	The Cure	Close to Me	The Head on the Door	65-872
Virgin Records America, Inc.	A Perfect Circle	Thinking of You	Mer De Noms	281-642
Virgin Records America, Inc.	Smashing Pumpkins	Take Me Down	Mellon Collie and the Infinite Sadness	183-904

Exhibit A

Doe #8 (160.39.202.174 2005-03-07 11:20:31 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Warner Bros. Records Inc.	Red Hot Chili Peppers	Apache Rose Peacock	Blood Sugar Sex Magik	135-276
Capitol Records, Inc.	Radiohead	High and Dry	The Bends	280-260
Warner Bros. Records Inc.	Red Hot Chili Peppers	Suck My Kiss	Blood Sugar Sex Magik	135-276
Warner Bros. Records Inc.	Red Hot Chili Peppers	Under the Bridge	Blood Sugar Sex Magik	135-276
UMG Recordings, Inc.	Sheryl Crow	Leaving Las Vegas	Tuesday Night Music Club	209-823

Exhibit A

Doe #9 (160.39.177.187 2005-03-07 11:48:24 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Warner Bros. Records Inc.	Linkin Park	By Myself	Hybrid Theory	288-402
Virgin Records America, Inc.	Smashing Pumpkins	Mellon Collie and the Infinite Sadness	Mellon Collie and the Infinite Sadness	183-904
Sony BMG Music Entertainment	Korn	Falling Away from Me	Issues	276-133

Exhibit A

Doe #10 (160.39.225.80 2005-03-07 12:37:33 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Sony BMG Music Entertainment	Incubus	11 am	Morning View	306-181
UMG Recordings, Inc.	Nelly	Ride Wit Me	Country Grammar	281-782
Interscope Records	No Doubt	Ex-Girlfriend	Return Of Saturn	279-727
Arista Records LLC	Phil Vassar	Like I Never Loved Before	Phil Vassar	284-145

Exhibit A

Doe #11 (160.39.188.167 2005-03-07 20:42:33 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Capitol Records, Inc.	Pink Floyd	Another Brick in the Wall, Pt. 2	The Wall	14-787
Sony BMG Music Entertainment	Pearl Jam	Even Flow	Ten	137-787
Capitol Records, Inc.	Pink Floyd	Comfortably Numb	The Wall	14-787
Sony BMG Music Entertainment	Marvin Gaye	Sexual Healing	Midnight Love	41-568

Exhibit A

Doe #12 (160.39.137.180 2005-03-07 22:14:30 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Interscope Records	Limp Bizkit	Break Stuff	Significant Other	279-827
Sony BMG Music Entertainment	Michael Jackson	Smooth Criminal	Bad	84-256
UMG Recordings, Inc.	Ja Rule	Between You and Me	Rule 3:36	270-080
Sony BMG Music Entertainment	Marvin Gaye	Sexual Healing	Midnight Love	41-568

Exhibit A

Doe #13 (160.39.236.156 2005-03-08 02:08:59 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
UMG Recordings, Inc.	Sting	Ghost Story	Brand New Day	271-015
Elektra Entertainment Group Inc.	Phish	Heavy Things	Farmhouse	281-388
Elektra Entertainment Group Inc.	The Cure	The Last Day Of Summer	Bloodflowers	267-229
Capitol Records, Inc.	Everclear	Everything to Everyone	So Much for the Afterglow	181-328
UMG Recordings, Inc.	U2	Helter Skelter	Rattle & Hum	99-818

Exhibit A

Doe #14 (160.39.236.111 2005-03-08 11:38:57 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
UMG Recordings, Inc.	Nirvana	Come As You Are	Nevermind	135-335
UMG Recordings, Inc.	Ludacris	Move Bitch	Word of Mouf	304-605
Sony BMG Music Entertainment	The Offspring	The Kids Aren't Alright	Americana	264-015
Capitol Records, Inc.	Richard Marx	Right Here Waiting	Repeat Offender	103-712
Virgin Records America, Inc.	Shaggy	Boombastic	Boombastic	222-048

Exhibit A

Doe #15 (160.39.169.46 2005-03-11 02:05:34 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Capitol Records, Inc.	Red Hot Chili Peppers	Punk Rock Classic	Mother's Milk	107-737
Capitol Records, Inc.	Red Hot Chili Peppers	Stone Cold Bush	Mother's Milk	107-737
Atlantic Recording Corporation	Chic	Good Times	Risque	13-540
BMG Music	Dave Matthews Band	So Much To Say	Crash	212-572
Arista Records LLC	Usher	U R the One	8701	307-207

Exhibit A

Doe #16 (160.39.180.209 2005-03-11 07:50:29 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Sony BMG Music Entertainment	Will Smith	Men in Black	Big Willie Style	249-123
UMG Recordings, Inc.	Sublime	Same In The End	Sublime	224-105
BMG Music	Dave Matthews Band	Stay (Wasting Time)	Before These Crowded Streets	257-982
Sony BMG Music Entertainment	Michael Jackson	The Way You Make Me Feel	Bad	84-256
Interscope Records	Dr. Dre	Light Speed	2001	277-983

Exhibit A

Doe #17 (160.39.192.26 2005-03-11 13:50:06 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
UMG Recordings, Inc.	U2	Bad	The Unforgettable Fire	72-483
Sony BMG Music Entertainment	Ricky Martin	Shake Your Bon-Bon	Ricky Martin	278-159
Priority Records LLC	NWA	Gangsta Gangsta	Straight Outta Compton	150-531
BMG Music	Christina Aguilera	What a Girl Wants	Christina Aguilera	274-004
Arista Records LLC	Dido	All You Want	No Angel	289-904

Exhibit A

Doe #18 (160.39.145.104 2005-03-25 20:32:32 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
UMG Recordings, Inc.	Nelly	Ride Wit Me	Country Grammar	281-782
Caroline Records, Inc.	Smashing Pumpkins	Crush	Gish	140-511
Caroline Records, Inc.	Smashing Pumpkins	Window Paine	Gish	140-511
Maverick Recording Company	Deftones	My Own Summer	Around The Fur	244-493

Exhibit A

Doe #19 (160.39.180.83 2005-03-27 06:11:07 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
UMG Recordings, Inc.	U2	With or Without You	The Joshua Tree	78-949
Atlantic Recording Corporation	Phil Collins	Sussudio	No Jacket Required	60-788
Warner Bros. Records Inc.	Red Hot Chili Peppers	Under the Bridge	Blood Sugar Sex Magik	135-276

Exhibit A

Doe #20 (160.39.145.203 2005-03-28 14:15:39 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
UMG Recordings, Inc.	Tonic	Open Up Your Eyes	Lemon Parade	257-075
Sony BMG Music Entertainment	Bruce Springsteen	Bobby Jean	Born In The U.S.A.	55-647
BMG Music	Vertical Horizon	Everything You Want	Everything You Want	277-868
Warner Bros. Records Inc.	Green Day	Hold On	Warning	288-352
UMG Recordings, Inc.	Nirvana	Lounge Act	Nevermind	135-335

Exhibit A

Doe #21 (160.39.180.153 2005-03-28 17:56:07 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Elektra Entertainment Group Inc.	Eagles	Hotel California	Hotel California	N38950
UMG Recordings, Inc.	DMX	Prayer (Skit)	It's Dark And Hell Is Hot	252-613
Sony BMG Music Entertainment	Marc Anthony	I Need To Know	Marc Anthony	284-194
Sony BMG Music Entertainment	Wyclef Jean	Gone Till November	Wyclef Jean Presents The Carnival Featuring Refugee Allstars	251-493
UMG Recordings, Inc.	Guns N Roses	Paradise City	Appetite for Destruction	85-358

Exhibit A

Doc #22 (160.39.208.183 2005-03-28 21:23:29 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Elektra Entertainment Group Inc.	Third Eye Blind	Semi-Charmed Life	Third Eye Blind	188-673
Sony BMG Music Entertainment	Babyface	And Our Feelings	For The Cool In You	184-540
Sony BMG Music Entertainment	Mariah Carey	Without You	Music Box	178-631
UMG Recordings, Inc.	U2	Wilde Honey	All That You Can't Leave Behind	294-631
Motown Record Company, L.P.	Charlene	I've Never Been to Me	I've Never Been to Me	33-525

Exhibit A

Doe #23 (160.39.209.56 2005-03-28 22:35:35 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Arista Records LLC	Outkast	Two Dope Boyz (In A Cadillac)	Atliens	233-296
Capitol Records, Inc.	Duran Duran	Planet Earth	Duran Duran	32-401
Interscope Records	No Doubt	Dark Blue	Return Of Saturn	279-727
Arista Records LLC	Outkast	Jazzy Belle	Atliens	233-296
Interscope Records	No Doubt	Home Now	Return Of Saturn	279-727

Exhibit A

Doe #24 (160.39.234.189 2005-03-29 03:20:36 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
UMG Recordings, Inc.	Shania Twain	Honey I'm Home	Come On Over	243-502
Sony BMG Music Entertainment	Celine Dion	To Love You More	Let's Talk About Love	248-109
Sony BMG Music Entertainment	Journey	Open Arms	Escape	30-088
Capitol Records, Inc.	White Town	Your Woman	Women in Technology	231-659
Capitol Records, Inc.	Robbie Williams	Angels	The Ego Has Landed	174-566

EXHIBIT A

Doe #25 (160.39.168.215 2005-03-28 15:54:13 (EST))

<u>Copyright Owner</u>	<u>Artist</u>	<u>Recording Title</u>	<u>Album Title</u>	<u>SR#</u>
Sony BMG Music Entertainment	Mariah Carey	Breakdown	Butterfly	244-014
Capitol Records, Inc.	Pink Floyd	Run Like Hell	The Wall	14-787
Arista Records LLC	Ace of Base	Wheel of Fortune	The Sign	169-749
Capitol Records, Inc.	Radiohead	How to Disappear Completely	Kid A	289-381
Arista Records LLC	Ace of Base	All That She Wants	The Sign	169-749