

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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

Plaintiffs,

-against-

DOES 1 - 40,

Defendants.

x
: **04 CV 00473**

: Civil Action No.:

JUDGE CHIN

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S.D. OF N.Y.
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
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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. Such illegal dissemination occurred in every jurisdiction in the United States, including this one. In addition, each Defendant contracted with an Internet Service Provider found in this District to provide each Defendant with the access to the Internet which facilitated Defendants' infringing activities.

PARTIES

1. Plaintiff Sony Music Entertainment 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.

5. 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.

6. Plaintiff London-Sire 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.

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

8. Plaintiff Arista 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.

9. Plaintiff Fonovisa, 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 California.

10. 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.

11. 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.

12. 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.

13. Plaintiff Lava Records LLC, a limited liability company, is a joint venture between Atlantic Recording Corporation and Diamond Music LLC, and is duly organized and existing under the laws of the State of Delaware, with its principal place of business in the State of New York.

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

15. 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.

16. Plaintiff Loud Records, LLC 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.

17. 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.¹

18. 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.

19. 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.

20. 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.

21. 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 ISP 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

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

23. 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.

24. 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.

25. 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.)

26. 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.

27. 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.

28. 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

January 21, 2004

Attorneys for Plaintiffs

By:

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Fax: (202) 639-6006

Exhibit A

Doe #1 (67.82.109.96 2003-11-30 08:35:10 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Sony Music Entertainment Inc.	Jennifer Lopez	Waiting For Tonight	On The 6	267-
Arista Records, Inc.	Kenny G	What A Wonderful World	Classics In The Key Of G	289-
BMG Music	Busta Rhymes	Pass the Courvoisier	Genesis	312-
UMG Recordings, Inc.	DMX	What These Bitches Want	...And Then There Was X	279-(
Sony Music Entertainment Inc.	Michael Jackson	The Way You Make Me Feel	Bad	84-25
UMG Recordings, Inc.	Bon Jovi	I'd Die for You	Slippery When Wet	71-79
Sony Music Entertainment Inc.	Nas	The Flyest	Stillmatic	305-6
Priority Records LLC	NWA	Gangsta Gangsta	Straight Outta Compton	150-5
Warner Bros. Records Inc.	Madonna	Impressive Instant	Music	285-8
Interscope Records	Eminem	My Fault	The Slim Shady LP	262-68
Interscope Records	Eve	Who's That Girl?	Scorpion	293-36

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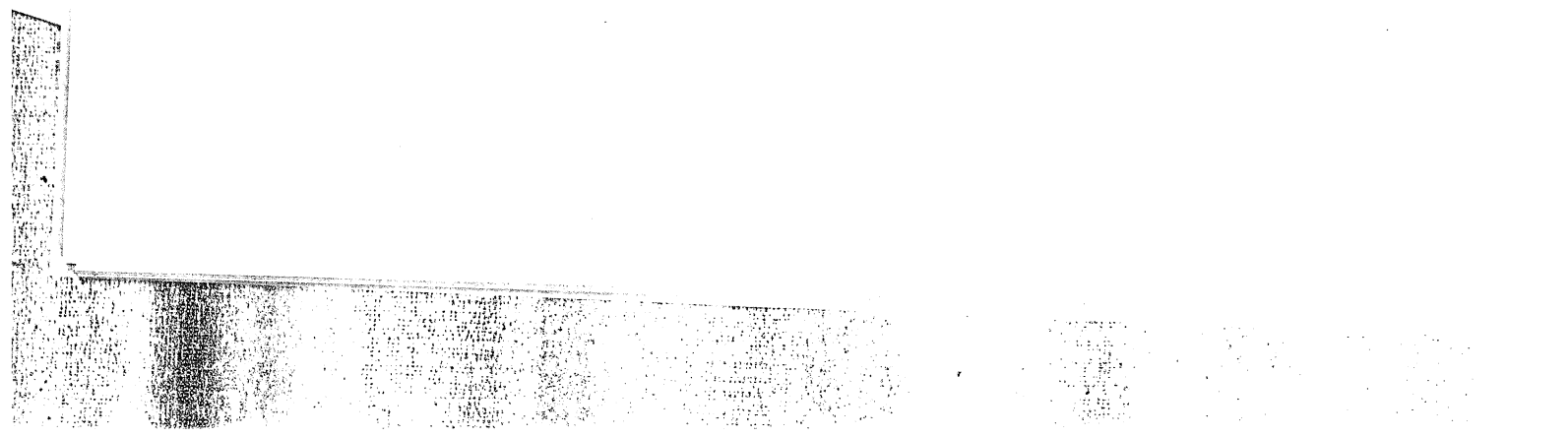


Exhibit A

Doe #2 (68.193.16.87 2003-12-01 12:01:52 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Elektra Entertainment Group Inc.	Eagles	Hotel California	Hotel California	N389
Sony Music Entertainment Inc.	REO Speedwagon	Keep on Loving You	Hi Infidelity	24-2'
Sony Music Entertainment Inc.	Celine Dion	To Love You More	Let's Talk About Love	248-
UMG Recordings, Inc.	3 Doors Down	Kryptonite	The Better Life	277-
Capitol Records, Inc.	Poison	Unskinny Bop	Flesh and Blood	119-
BMG Music	Martina McBride	I Love You	Emotion	269-

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Exhibit A

Doe #3 (67.87.36.184 2003-12-10 19:43:22 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Arista Records, Inc.	Clipse	Grindin'	Lord Willin'	321-
Priority Records LLC	NWA	Express Yourself	Straight Outta Compton	150-
Atlantic Recording Corporation	Genesis	Man On The Corner	Abacab	29-6
Interscope Records	Eminem	The Real Slim Shady	The Marshall Mathers LP	287-
Capitol Records, Inc.	Grand Funk Railroad	We're An American Band	We're An American Band	N-94
Atlantic Recording Corporation	Chic	Good Times	Risque	13-5
BMG Music	Foo Fighters	Learn To Fly	There Is Nothing Left To Lose	285-

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Exhibit A

Doe #4 (67.85.252.203 2003-12-02 15:34:55 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Sony Music Entertainment Inc.	Maxwell	Suitelady (The Proposal Jam)	Maxwell's Urban Hang Suite	221
Motown Record Company, L.P.	Boyz II Men	Uhh Ahh	Cooleyhighharmony	212
Sony Music Entertainment Inc.	Journey	Send Her My Love	Frontiers	43-
BMG Music	Dave Matthews Band	Tripping Billies	Crash	212
UMG Recordings, Inc.	DMX	Prayer (Skit)	It's Dark And Hell Is Hot	252
Arista Records, Inc.	Usher	Nice and Slow	My Way	257

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Exhibit A

Doe #5 (67.86.197.58 2003-11-23 07:33:48 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
UMG Recordings, Inc.	Blues Traveler	Most Precarious	Straight On Till Morning	245-5
UMG Recordings, Inc.	Sublime	Santeria	Sublime	224-1
Sony Music Entertainment Inc.	Bruce Springsteen	Atlantic City	Nebraska	43-46
Capitol Records, Inc.	Kim Wilde	Kids In America	Kim Wilde	33-47
BMG Music	Eve 6	Here's To The Night	Horrorscope	285-02
Warner Bros. Records Inc.	Dire Straits	Money for Nothing	Brothers In Arms	63-040
Capitol Records, Inc.	Blondie	Heart of Glass	Parallel Lines	4-090
Warner Bros. Records Inc.	Chris Isaak	Wicked Game	Heart Shaped World	107-76

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Exhibit A

Doe #6 (24.45.233.134 2003-12-08 05:19:02 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE
Capitol Records, Inc.	Norah Jones	Don't Know Why	Come Away With Me
UMG Recordings, Inc.	U2	Walk On	All That You Can't Leave Behind
Sony Music Entertainment Inc.	Quiet Riot	Mama Weer All Crazee Now	Condition Critical
UMG Recordings, Inc.	Mary J. Blige	Share My World Mary	Share My World
UMG Recordings, Inc.	U2	Angel Of Harlem	Rattle & Hum
UMG Recordings, Inc.	Guns N Roses	Mr. Brownstone	Appetite for Destruction
UMG Recordings, Inc.	U2	Mysterious Ways	Achtung Baby
Sony Music Entertainment Inc.	Maxwell	Sumthin' Sumthin'	Maxwell's Urban Hang Suite
Sony Music Entertainment Inc.	Korn	All in the Family	Follow the Leader
UMG Recordings, Inc.	U2	With or Without You	The Joshua Tree

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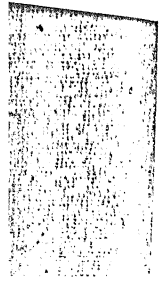


Exhibit A

Doe #7 (67.86.254.179 2003-11-30 18:10:18 (EST))

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COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE
BMG Music	Dave Matthews Band	Everyday	Everyday
Warner Bros. Records Inc.	Red Hot Chili Peppers	Under the Bridge	Blood Sugar Sex Magik
Maverick Recording Company	Deftones	My Own Summer	Around The Fur
BMG Music	Dave Matthews Band	Say Goodbye	Crash
UMG Recordings, Inc.	Ludacris	Roll Out	Word of Mouf
Elektra Entertainment Group Inc.	Phish	Farmhouse	Farmhouse
Sony Music Entertainment Inc.	Ricky Martin	She's All I Ever Had	Ricky Martin
Interscope Records	Dr. Dre	Still D.R.E.	2001
Sony Music Entertainment Inc.	Nas	Hate Me Now	I Am
Sony Music Entertainment Inc.	Celine Dion	My Heart Will Go On	Let's Talk About L
UMG Recordings, Inc.	Nirvana	Smells Like Teen Spirit	Nevermind

DOES 1 - 40,

Plaintiffs, l

Exhibit A

Doe #8 (67.83.83.155 2003-12-07 23:52:07 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE
Arista Records, Inc.	Pink	You Make Me Sick	Can't Take Me Home
Capitol Records, Inc.	Pink Floyd	Another Brick in the Wall, Pt. 2	The Wall
Warner Bros. Records Inc.	Linkin Park	One Step Closer	Hybrid Theory
UMG Recordings, Inc.	Tonic	If You Could Only See	Lemon Parade
BMG Music	Christina Aguilera	Reflection	Christina Aguilera
Sony Music Entertainment Inc.	Ricky Martin	Maria	Ricky Martin
Warner Bros. Records Inc.	Madonna	Material Girl	Like a Virgin
Sony Music Entertainment Inc.	The Offspring	She's Got Issues	Americana
Elektra Entertainment Group Inc.	Third Eye Blind	How's It Going to Be	Third Eye Blind
UMG Recordings, Inc.	Tonic	You Wanted More	Sugar

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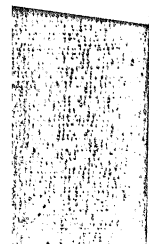


Exhibit A

Doe #9 (67.83.161.214 2003-12-04 06:45:19 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR
BMG Music	Dave Matthews Band	So Right	Everyday	300
Arista Records, Inc.	Westlife	Flying Without Wings	Westlife	284
UMG Recordings, Inc.	U2	With or Without You	The Joshua Tree	78-
Arista Records, Inc.	Whitney Houston	My Love Is Your Love	My Love is Your Love	298
Sony Music Entertainment Inc.	Fiona Apple	Shadowboxer	Tidal	227

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Doe #10 (67.85.55.9 2003-11-28 17:00:20 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Warner Bros. Records Inc.	Fleetwood Mac	Dreams	Rumours	N39
Atlantic Recording Corporation	Phil Collins	One More Night	No Jacket Required	60-7
Sony Music Entertainment Inc.	Cyndi Lauper	Time After Time	She's So Unusual	50-8
Sony Music Entertainment Inc.	Celine Dion	Because You Loved Me	Falling Into You	224-
Motown Record Company, L.P.	Lionel Richie	Stuck on You	Can't Slow Down	49-2
UMG Recordings, Inc.	Bon Jovi	Livin' on a Prayer	Slippery When Wet	71-7

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PAGES 1 - 4

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Exhibit A

Doe #11 (67.86.242.73 2003-12-07 21:33:41 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Capitol Records, Inc.	Pink Floyd	Another Brick in the Wall, Pt. 2	The Wall	14-78
Motown Record Company, L.P.	Diana Ross	I'm Coming Out	Diana	17-85
Sony Music Entertainment Inc.	Cyndi Lauper	Time After Time	She's So Unusual	50-82
UMG Recordings, Inc.	DMX	Party Up	...And Then There Was X	279-01
Warner Bros. Records Inc.	Green Day	Castaway	Warning	288-35
Arista Records, Inc.	Avril Lavigne	Complicated	Let Go	312-78
Interscope Records	No Doubt	Don't Speak	Tragic Kingdom	206-72
Capitol Records, Inc.	Duran Duran	Hungry Like the Wolf	Rio	38-444
Warner Bros. Records Inc.	Green Day	Basket Case	Dookie	185-45
Sony Music Entertainment Inc.	Korn	Low Rider	Life is Peachy	230-57
Arista Records, Inc.	Pink	Don't Let Me Get Me	Don't Let Me Get Me (single)	309-896

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Exhibit A

Doe #13 (67.83.214.31 2003-12-05 12:28:41 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Capitol Records, Inc.	Marcy Playground	Sex and Candy	Marcy Playground	240-954
Arista Records, Inc.	Adema	Freaking Out	Adema	302-233
Arista Records, Inc.	Ace of Base	Don't Turn Around	The Sign	169-749
Warner Bros. Records Inc.	Devo	Whip It	Freedom of Choice	17-936
UMG Recordings, Inc.	Sublime	Badfish	Second Hand Smoke	246-011
Sony Music Entertainment Inc.	Incubus	Nebula	SCIENCE	249-690
Elektra Entertainment Group Inc.	Third Eye Blind	Semi-Charmed Life	Third Eye Blind	188-673

Exhibit A

Doe #14 (67.87.48.91 2003-12-04 08:26:24 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Elektra Entertainment Group Inc.	Eagles	Hotel California	Hotel California	N38950
Sony Music Entertainment Inc.	Nas	Hate Me Now	I Am	175-149
UMG Recordings, Inc.	Ja Rule	Love Me Hate Me	Rule 3:36	270-080
UMG Recordings, Inc.	DMX	Slippin'	Flesh of My Flesh, Blood Of My Blood	188-987
Atlantic Recording Corporation	Trick Daddy	Take It to da House	Thugs Are Us	303-748
UMG Recordings, Inc.	Shaggy	It Wasn't Me	Hot Shot	286-657

Exhibit A

Doe #15 (68.192.174.248 2003-12-04 11:43:12 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Warner Bros. Records Inc.	Linkin Park	One Step Closer	Hybrid Theory	288-402
Warner Bros. Records Inc.	Red Hot Chili Peppers	Around The World	Californication	174-922
Atlantic Recording Corporation	Trick Daddy	I'm A Thug	Thugs Are Us	303-748
Sony Music Entertainment Inc.	Incubus	A Certain Shade of Green	SCIENCE	249-690
Interscope Records	Eminem	Who Knew	The Marshall Mathers LP	287-944
BMG Music	SR-71	Right Now	Now You See Inside	283-812
BMG Music	Alabama	Born Country	Born Country	235-743
Sony Music Entertainment Inc.	Korn	Got The Life	Follow the Leader	263-749
Sony Music Entertainment Inc.	Korn	Falling Away from Me	Issues	276-133
UMG Recordings, Inc.	Godsmack	Voodoo	Godsmack	241-879
Interscope Records	Limp Bizkit	Re-Arranged	Significant Other	279-827

Exhibit A

Doe #16 (67.87.74.192 2003-11-30 22:14:10 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Arista Records, Inc.	TLC	Unpretty	Fanmail	298-454
Motown Record Company, L.P.	98 Degrees	I Do (Cherish You)	98 Degrees & Rising	237-315
UMG Recordings, Inc.	Bon Jovi	Wanted Dead Or Alive	Slippery When Wet	71-794
Loud Records LLC	Big Punisher	Still Not a Player	Capital Punishment	260-263
UMG Recordings, Inc.	Ja Rule	Put It On Me	Rule 3:36	270-080
Virgin Records America, Inc.	Soul II Soul	Keep On Movin'	Keep On Movin	105-226
BMG Music	Jerry Rivera	Quiero	Rivera	291-696
Priority Records LLC	Ice Cube	Check Yo Self	The Predator	169-617

Exhibit A

Doe #19 (67.85.238.70 2003-12-04 06:19:10 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Elektra Entertainment Group Inc.	Tracy Chapman	Fast Car	Tracy Chapman	92-491
Atlantic Recording Corporation	Genesis	Illegal Alien	Genesis	49-248
Capitol Records, Inc.	Pink Floyd	Is There Anybody Out There?	The Wall	14-787
Arista Records, Inc.	Avril Lavigne	I'm With You	Let Go	312-786
UMG Recordings, Inc.	Counting Crows	A Long December	Recovering The Satellites	226-415
Interscope Records	No Doubt	Don't Speak	Tragic Kingdom	206-724
Sony Music Entertainment Inc.	Bruce Springsteen	The Ties That Bind	The River	25-235
Sony Music Entertainment Inc.	Bruce Springsteen	Badlands	Darkness on the Edge of Town	3-323

Exhibit A

Doe #20 (67.85.190.92 2003-12-04 16:24:58 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Virgin Records America, Inc.	Janet Jackson	What About	The Velvet Rope	261-516
Capitol Records, Inc.	Bonnie Raitt	I Can't Make You Love Me	Luck of the Draw	133-193
UMG Recordings, Inc.	Shania Twain	That Don't Impress Me Much	Come On Over	243-502
Warner Bros. Records Inc.	Madonna	Express Yourself	Like a Prayer	106-808
Sony Music Entertainment Inc.	Mariah Carey	My All	Butterfly	244-014
Sony Music Entertainment Inc.	Will Smith	Miami	Big Willie Style	249-123
Warner Bros. Records Inc.	Madonna	Like a Virgin	Like a Virgin	59-442
UMG Recordings, Inc.	Bon Jovi	Raise Your Hand	Slippery When Wet	71-794
Atlantic Recording Corporation	Jewel	Foolish Games	Pieces of You	198-481

Exhibit A

Doe #21 (67.81.188.20 2003-12-05 11:24:09 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Atlantic Recording Corporation	Lil' Kim	No Matter What They Say	The Notorious K.I.M.	286-624
BMG Music	Alicia Keys	Mr. Man	Songs in A Minor	299-410
Virgin Records America, Inc.	Kelis	Caught Out There	Kaleidoscope	277-087
Elektra Entertainment Group Inc.	Pete Rock and CL Smooth	Reminisce (T.R.O.Y)	Mecca and the Soul Brother	145-714
Sony Music Entertainment Inc.	Korn	Freak On a Leash	Follow the Leader	263-749
UMG Recordings, Inc.	U2	With or Without You	The Joshua Tree	78-949
Priority Records LLC	Ice Cube	Wicked	The Predator	169-617
Sony Music Entertainment Inc.	Korn	Blind	Korn	201-939
UMG Recordings, Inc.	DMX	One More Road To Cross	...And Then There Was X	279-017
Maverick Recording Company	Michelle Branch	You Set Me Free	The Spirit Room	303-732

Exhibit A

Doe #22 (67.87.65.2 2003-12-04 15:30:54 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
BMG Music	Tyrese	Just a Baby Boy	2000 Watts	293-345
Atlantic Recording Corporation	Trick Daddy	I'm A Thug	Thugs Are Us	303-748
BMG Music	SWV	Can We	Release Some Tension	249-300
BMG Music	Busta Rhymes	Break Ya Neck	Genesis	312-547
Priority Records LLC	NWA	Automobile	Efil4zaggin'	137-627
Priority Records LLC	Snoop Dogg	Woof!	Da Game Is To Be Sold, Not To Be Told	260-056
UMG Recordings, Inc.	Ludacris	Phat Rabbit	Back For the First Time	289-433
UMG Recordings, Inc.	Ja Rule	Between You and Me	Rule 3:36	270-080
Priority Records LLC	NWA	Express Yourself	Straight Outta Compton	150-531

Exhibit A

Doe #23 (67.81.173.199 2003-11-29 01:13:02 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Virgin Records America, Inc.	Shaggy	Boombastic	Boombastic	222-048
Arista Records, Inc.	Usher	My Way	My Way	257-730
BMG Music	Tyrese	Lately	Tyrese	237-788
Interscope Records	Limp Bizkit	Break Stuff	Significant Other	279-827
Sony Music Entertainment Inc.	Wyclef Jean	Anything Can Happen	Wyclef Jean Presents The Carnival Featuring Refugee Allstars	251-493
BMG Music	Christina Aguilera	Genie in a Bottle	Christina Aguilera	274-004
Sony Music Entertainment Inc.	Mariah Carey	Always Be My Baby	Daydream	215-243

Exhibit A

Doe #24 (68.193.174.1 2003-12-05 20:05:56 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
BMG Music	Dave Matthews Band	Everyday	Everyday	300-313
UMG Recordings, Inc.	Bon Jovi	Livin' on a Prayer	Slippery When Wet	71-794
Atlantic Recording Corporation	Jewel	Down So Long	Spirit	261-953
UMG Recordings, Inc.	Shania Twain	From This Moment On	Come On Over	243-502
Sony Music Entertainment Inc.	Pearl Jam	Betterman	Vitalogy	206-558
Sony Music Entertainment Inc.	George Michael	Kissing A Fool	Faith	92-432
UMG Recordings, Inc.	Guns N Roses	Welcome to the Jungle	Appetite for Destruction	85-358
Sony Music Entertainment Inc.	Babyface	Every Time I Close My Eyes	The Day	231-025

Exhibit A

Doe #27 (67.83.81.250 2003-12-01 14:00:41 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Warner Bros. Records Inc.	Leo Sayer	When I Need You	Endless Flight	N37784
Arista Records, Inc.	Kenny G	Loving You	Kenny G Greatest Hits	263-707
Warner Bros. Records Inc.	Leo Sayer	More Than I Can Say	Living in a Fantasy	22-022
UMG Recordings, Inc.	Mark Wills	I Do (Cherish You)	Wish You Were Here	251-938
Arista Records, Inc.	Alan Jackson	It's Alright to Be a Redneck	When Somebody Loves You	289-367
BMG Music	Kenny Chesney	Don't Happen Twice	Greatest Hits	277-700
Arista Records, Inc.	Kenny G	The Moment	The Moment	236-228
Sony Music Entertainment Inc.	Celine Dion	My Heart Will Go On	Let's Talk About Love	248-109
Sony Music Entertainment Inc.	Julio Iglesias	Can't Help Falling In Love	Starry Night	127-481
Arista Records, Inc.	Kenny G	Summertime	Classics In The Key Of G	289-898

Exhibit A

Doe #28 (67.83.82.157 2003-12-08 06:08:50 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Arista Records, Inc.	Usher	I Can't Let U Go	8701	307-207
Sony Music Entertainment Inc.	Mariah Carey	Always Be My Baby	Daydream	215-243
UMG Recordings, Inc.	Ludacris	Area Codes	Word of Mouf	304-605
Elektra Entertainment Group Inc.	Eagles	Life in the Fast Lane	Hotel California	N38950
Sony Music Entertainment Inc.	Destiny's Child	Jumpin' Jumpin'	The Writing's on the Wall	268-936
Arista Records, Inc.	Avril Lavigne	Complicated	Let Go	312-786
Capitol Records, Inc.	Red Hot Chili Peppers	Higher Ground	Mother's Milk	107-737

Exhibit A

Doe #29 (67.87.77.126 2003-12-01 11:09:44 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Sony Music Entertainment Inc.	Nas	The World is Yours	Illmatic	207-177
Warner Bros. Records Inc.	Linkin Park	With You	Hybrid Theory	288-402
Sony Music Entertainment Inc.	Nas	One Mic	Stillmatic	305-698
Priority Records LLC	Mack 10	Backyard Boogie	Based on a true story	191-356
Priority Records LLC	Snoop Dogg	Lay Low	Tha Last Meal	317-638
Atlantic Recording Corporation	Jewel	Foolish Games	Pieces of You	198-481
BMG Music	Tyrese	I'm Sorry	2000 Watts	293-345
UMG Recordings, Inc.	Ludacris	Area Codes	Word of Mouf	304-605
UMG Recordings, Inc.	Dru Hill	Angel	Enter the Dru	290-402
BMG Music	Tyrese	Sweet Lady	Tyrese	237-788

Exhibit A

Doe #30 (67.80.88.91 2003-12-04 07:30:39 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Virgin Records America, Inc.	UB40	Red Red Wine	Labour of Love	49-244
Arista Records, Inc.	Whitney Houston	Exhale (Shoop, Shoop)	Waiting to Exhale Soundtrack	219-539
London-Sire Records Inc.	Eden's Crush	Get Over Yourself	Popstars	187-319
Warner Bros. Records Inc.	Linkin Park	One Step Closer	Hybrid Theory	288-402
Sony Music Entertainment Inc.	Celine Dion	Because You Loved Me	Falling Into You	224-159
Arista Records, Inc.	Pink	Hell Wit Ya	Can't Take Me Home	279-958
Interscope Records	Eve	Ain't Got No Dough	Let There Be Eve...Ruff Ryder's First Lady	265-925
Interscope Records	Ruff Ryders	Jigga My Nigga	Ryde Or Die Compilation Volume 1	179-239

Exhibit A

Doe #33 (67.82.237.191 2003-12-03 13:17:04 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Interscope Records	Eminem	The Real Slim Shady	The Marshall Mathers LP	287-944
Capitol Records, Inc.	Richard Marx	Right Here Waiting	Repeat Offender	103-712
Atlantic Recording Corporation	Matchbox 20	Real World	Yourself or Someone Like You	227-755
Capitol Records, Inc.	MC Hammer	U Can't Touch This	Please Hammer Don't Hurt 'Em	133-683
UMG Recordings, Inc.	Guns N Roses	Welcome to the Jungle	Appetite for Destruction	85-358
BMG Music	Eve 6	Here's To The Night	Horrorscope	285-024
Sony Music Entertainment Inc.	Celine Dion	My Heart Will Go On	Let's Talk About Love	248-109

Exhibit A

Doe #34 (24.44.198.29 2003-11-30 11:56:40 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Elektra Entertainment Group Inc.	En Vogue	Don't Let Go (Love)	EV3	188-664
Virgin Records America, Inc.	Janet Jackson	That's The Way Love Goes	Janet	174-392
Sony Music Entertainment Inc.	Destiny's Child	Emotion	Survivor	289-199
UMG Recordings, Inc.	Janet Jackson	Let's Wait Awhile	Control	69-529
Capitol Records, Inc.	MC Hammer	U Can't Touch This	Please Hammer Don't Hurt 'Em	133-683
Sony Music Entertainment Inc.	Michael Jackson	Smooth Criminal	Bad	84-256
Interscope Records	Eve	Let Me Blow Ya Mind	Scorpion	293-364
Warner Bros. Records Inc.	Seal	Kiss From A Rose	Seal	271-303
BMG Music	Busta Rhymes	Break Ya Neck	Genesis	312-547

Exhibit A

Doe #35 (68.193.241.154 2003-12-10 21:29:31 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Priority Records LLC	NWA	Express Yourself	Straight Outta Compton	150-531
Arista Records, Inc.	TLC	I Miss You So Much	Fanmail	298-454
Elektra Entertainment Group Inc.	Missy Elliot	Best Friends	Supa Dupa Fly	245-232
Sony Music Entertainment Inc.	Bruce Springsteen	The Ties That Bind	The River	25-235
Maverick Recording Company	Michelle Branch	Goodbye to You	The Spirit Room	303-732
Arista Records, Inc.	Westlife	Flying Without Wings	Westlife	284-150
UMG Recordings, Inc.	Bon Jovi	Livin' on a Prayer	Slippery When Wet	71-794
UMG Recordings, Inc.	Shania Twain	Man! I Feel Like A Woman	Come On Over	243-502

Exhibit A

Doe #36 (67.82.142.132 2003-12-05 01:46:43 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
BMG Music	Busta Rhymes	Break Ya Neck	Genesis	312-547
Priority Records LLC	Lil' Romeo	My Baby	Lil Romeo	317-620
Capitol Records, Inc.	Robbie Williams	Angels	The Ego Has Landed	174-566
Capitol Records, Inc.	Bobby McFerrin	Don't Worry, Be Happy	Simple Pleasures	97-575
UMG Recordings, Inc.	DMX	What's My Name?	...And Then There Was X	279-017
Interscope Records	Sheryl Crow	Soak Up The Sun	C'Mon C'Mon	311-757
Elektra Entertainment Group Inc.	Missy Elliot	Smooth Chick	Da Real World	179-190
Elektra Entertainment Group Inc.	En Vogue	Don't Let Go (Love)	EV3	188-664
Sony Music Entertainment Inc.	Marvin Gaye	Sexual Healing	Midnight Love	41-568
Sony Music Entertainment Inc.	Ricky Martin	Nobody Wants To Be Lonely	Sound Loaded	305-060

Exhibit A

Doe #37 (68.193.175.43 2003-12-03 22:52:00 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Atlantic Recording Corporation	Sugar Ray	Fly	Floored	208-769
BMG Music	Foo Fighters	Generator	There Is Nothing Left To Lose	285-034
Priority Records LLC	Snoop Dogg	Lay Low	Tha Last Meal	317-638
Capitol Records, Inc.	Red Hot Chili Peppers	Higher Ground	Mother's Milk	107-737
Sony Music Entertainment Inc.	Incubus	Pardon Me	Make Yourself	278-818
Interscope Records	No Doubt	Don't Speak	Tragic Kingdom	206-724
Sony Music Entertainment Inc.	Will Smith	Miami	Big Willie Style	249-123
Sony Music Entertainment Inc.	Ricky Martin	Shake Your Bon-Bon	Ricky Martin	278-159
UMG Recordings, Inc.	U2	With or Without You	The Joshua Tree	78-949

Exhibit A**Doe #38 (67.81.178.172 2003-12-09 07:04:49 (EST))**

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Virgin Records America, Inc.	Ideal	Get Gone	Ideal	273-905
Elektra Entertainment Group Inc.	Keith Sweat	Make It Last Forever	Make It Last Forever	86-761
Elektra Entertainment Group Inc.	Tamia	Go	A Nu Day	293-084
UMG Recordings, Inc.	Dru Hill	5 Steps	Dru Hill	227-760
UMG Recordings, Inc.	Avant	My First Love	My Thoughts	281-220
Sony Music Entertainment Inc.	Destiny's Child	Dangerously in Love	Survivor	289-199
UMG Recordings, Inc.	LL Cool J	Around The Way Girl	Mama Said Knock You Out	123-555
Arista Records, Inc.	Usher	U Got It Bad	8701	307-207
Interscope Records	Eve	You Had Me You Lost Me	Scorpion	293-364

Exhibit A

Doe #39 (67.86.24.41 2003-11-30 08:11:44 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Warner Bros. Records Inc.	Linkin Park	Crawling	Hybrid Theory	288-402
Capitol Records, Inc.	MC Hammer	Dancing Machine	Please Hammer Don't Hurt 'Em	133-683
Arista Records, Inc.	Whitney Houston	Just The Lonely Talking Again	Whitney	89-966
Arista Records, Inc.	Whitney Houston	It's Not Right But It's Okay	My Love is Your Love	298-453
Motown Record Company, L.P.	Boyz II Men	Water Runs Dry	II	196-004
Sony Music Entertainment Inc.	Sade	No Ordinary Love	Love Deluxe	183-731
Arista Records, Inc.	Whitney Houston	Same Script, Different Cast	Whitney The Greatest Hits	284-891
Motown Record Company, L.P.	Brian McKnight	Last Dance	Back At One	279-471

Exhibit A

Doe #40 (67.86.181.185 2003-11-25 08:49:54 (EST))

COPYRIGHT OWNER	ARTIST	RECORDING TITLE	ALBUM TITLE	SR#
Sony Music Entertainment Inc.	Incubus	Under My Umbrella	Morning View	306-181
Sony Music Entertainment Inc.	Billy Joel	We Didn't Start the Fire	Storm Front	109-420
Capitol Records, Inc.	Pink Floyd	Comfortably Numb	The Wall	14-787
Arista Records, Inc.	Usher	Nice and Slow	My Way	257-730
Sony Music Entertainment Inc.	Pearl Jam	Daughter	Vs.	207-219
Interscope Records	No Doubt	Simple Kind Of Life	Return Of Saturn	279-727
BMG Music	Lit	My Own Worst Enemy	A Place in the Sun	264-272