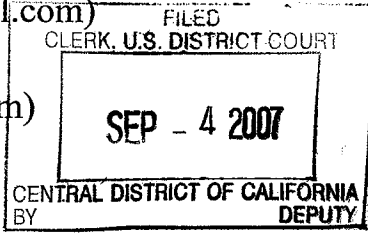


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6 Attorneys for Plaintiffs

7  
 8 UNITED STATES DISTRICT COURT  
 9 CENTRAL DISTRICT OF CALIFORNIA  
 10 WESTERN DIVISION

11 UMG RECORDINGS, INC., a  
 12 Delaware corporation; UNIVERSAL  
 13 MUSIC CORP., a New York  
 14 corporation; SONGS OF UNIVERSAL,  
 15 INC., a California corporation;  
 16 UNIVERSAL-POLYGRAM  
 17 INTERNATIONAL PUBLISHING,  
 18 INC., a Delaware corporation;  
 19 RONDOR MUSIC INTERNATIONAL,  
 20 INC., a California corporation;  
 21 UNIVERSAL MUSIC—MGB NA  
 LLC, a California Limited Liability  
 Company; UNIVERSAL MUSIC—Z  
 TUNES LLC, a New York Limited  
 Liability Company; UNIVERSAL  
 MUSIC—MBG MUSIC PUBLISHING  
 LTD., a UK company,

Case No. *CV 07-5744-GW(CR)*

**NOTICE OF RELATED CASE**

Judge:  
Courtroom:

22 Plaintiffs,

23 v.

24 VEOH NETWORKS, INC., a Delaware  
 25 corporation; and DOES 1-10, inclusive,

26 Defendants.

1 TO THE CLERK OF THIS COURT AND TO ALL PARTIES AND  
2 THEIR COUNSEL OF RECORD:

3 PLEASE TAKE NOTICE that, pursuant to Local Rule 83-1.3, the above-  
4 captioned case (“UMG Recordings v. Veoh”) is related to *UMG Recordings, Inc., et*  
5 *al. v. Grouper Networks, Inc., et al.*, C.D. Cal. Case No. CV 06-06561 AHM  
6 (“*UMG Recordings v. Grouper*”); *UMG Recordings, Inc., et al. v. Bolt, Inc., et al.*,  
7 C.D. Cal. Case No. 06-06577 AHM (“*UMG Recordings v. Bolt*”); and *UMG*  
8 *Recordings, Inc., et al. v. MySpace, Inc., et al.*, C.D. Cal. Case No. Case No. CV 06-  
9 07361 AHM (“*UMG Recordings v. MySpace*”).<sup>1</sup> In that regard, we note that *UMG*  
10 *Recordings v. Bolt* was originally assigned to Judge Otero, but transferred to Judge  
11 Matz as a case related to *UMG Recordings v. Grouper*. *UMG Recordings v.*  
12 *MySpace* has also been transferred to Judge Matz.

13 Local Rule 83-1.3.1 provides that two cases filed in this District are related if  
14 they appear to:

- 15 (a) To arise from the same or a closely related transaction, happening or  
16 event; or
- 17 (b) To call for determination of the same or substantially related or similar  
18 questions of law and fact; or
- 19 (c) For other reasons would entail substantial duplication of labor if heard  
20 by different judges; or
- 21 (d) To involve the same patent, trademark or copyright, and one of the  
22 factors identified above in a, b or c is present.

23 This case is related to *UMG Recordings v. Grouper*, *UMG Recordings v. Bolt*,  
24 and *UMG Recordings v. MySpace* for each of these reasons.

25 \_\_\_\_\_  
26 <sup>1</sup> UMG notes that Veoh has filed an action for declaratory relief against UMG  
27 in the Southern District of California, which has been assigned to the Hon. Thomas  
28 J. Whelan. *See Veoh Networks, Inc. v. UMG Recordings, Inc., et al.*, Case No. 07  
CV 1568 TJW (BLM). UMG will be filing a motion to dismiss or alternatively to  
transfer Veoh's Southern District action to the Central District, where it can receive  
coordinated treatment with UMG's actions against Grouper, Bolt, and MySpace.

1 First, all of these actions arise from “closely related transaction[s],  
2 happening[s] or event[s].” All four actions involve copyright infringement claims  
3 by the same Plaintiffs against defendants’ “user-generated video” websites. These  
4 actions assert that defendants’ websites directly, vicariously and contributorily  
5 infringe Plaintiffs’ copyrights by allowing users to upload files containing Plaintiffs’  
6 copyrighted works, copying those works and then facilitating and encouraging  
7 further infringement of those works by third parties all over the world.

8 Second, each of these actions “call[s] for determination of the same or  
9 substantially related or similar questions of law and fact.” These actions assert  
10 identical claims for infringement: direct, contributory and vicarious copyright  
11 infringement, and inducement of copyright infringement. These actions assert that  
12 this infringement was accomplished in substantially similar ways (see above). As a  
13 result, the issues of law and fact involved in these actions will be substantially  
14 similar – indeed, the analysis of many of the central issues in these cases will be  
15 identical.

16 Third, considerations of judicial economy and the swift administration of  
17 justice weigh strongly in favor of relating these cases. Given that these cases  
18 involve the same Plaintiffs, challenge the same or similar activities, rely on the same  
19 or similar evidence, and require analysis under the same statutes and other legal  
20 authorities, there would be a “substantial duplication of labor” if they were heard by  
21 different judges. Simply put, it would be a waste of judicial resources and would be  
22 likely to unduly delay and detract from efficient determination of the action to have  
23 this case heard by a different Judge than Judge Matz who is presiding over *UMG*  
24 *Recordings v. Grouper*, *UMG Recordings v. Bolt*, and *UMG Recordings v.*  
25 *MySpace*.

26 Finally, these actions will require the Court to determine whether many of  
27 the same copyrights have been infringed by defendant’s conduct. These cases allege  
28 widespread infringement of Plaintiffs’ copyrighted sound recordings and/or

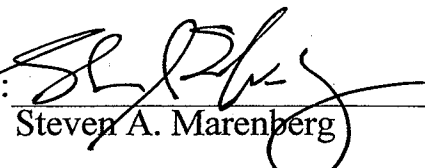
1 copyrighted musical compositions. Due to the widespread availability of Plaintiffs'  
2 copyrighted works on the websites of the defendants in both this case and in *UMG*  
3 *Recordings v. Grouper*, *UMG Recordings v. Bolt*, and *UMG Recordings v.*  
4 *MySpace*, it is anticipated that the vast majority of the copyrighted works at issue in  
5 each of these cases will be the same. Indeed, many of the artists, composers and  
6 copyrighted works cited in the respective complaints are identical.

7 For the foregoing reasons, like *UMG Recordings v. Bolt* and *UMG*  
8 *Recordings v. MySpace* were, *UMG Recordings v. Veoh* too should be deemed  
9 related to *UMG Recordings, Inc., et al. v. Grouper Networks, Inc., et al.*, Case No.  
10 CV06-6561 AHM, and thereby assigned to the Honorable A. Howard Matz.

11  
12 Dated: September 4, 2007

Respectfully submitted,

13 IRELL & MANELLA LLP  
14 Steven A. Marenberg  
15 Elliot Brown  
16 Brian Ledahl  
17 Benjamin Glatstein

18 By:   
Steven A. Marenberg

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21 UNIVERSAL MUSIC CORP.; SONGS  
22 OF UNIVERSAL, INC.; UNIVERSAL-  
23 POLYGRAM INTERNATIONAL  
24 PUBLISHING, INC.; RONDOR MUSIC  
25 INTERNATIONAL, INC.; BMG MUSIC  
26 PUBLISHING NA; UNIVERSAL  
27 MUSIC—MGB NA LLC; UNIVERSAL  
28 MUSIC—Z TUNES LLC and  
UNIVERSAL MUSIC—MBG MUSIC  
PUBLISHING LTD.