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9 Attorneys for Plaintiffs
 10 UMG Recordings, Inc.;
 11 Universal Music Corp.;
 12 Songs of Universal, Inc.;
 13 Universal-Polygram International Publishing, Inc.;
 14 and Rondor Music International, Inc.

15 UNITED STATES DISTRICT COURT
 16 CENTRAL DISTRICT OF CALIFORNIA
 17 WESTERN DIVISION

18 UMG RECORDINGS, INC., *et al.*,) Case No. CV 06-07361 AHM (AJWx)

19 Plaintiffs,

20 vs.

21 **PLAINTIFFS' INITIAL
 22 DISCLOSURES PURSUANT TO
 23 FRCP 26(a)(1)**

24 MYSPACE, INC. d/b/a/
 25 MYSPACE.COM, a Delaware
 26 corporation; NEWS CORPORATION, a
 27 Delaware corporation; and DOES 1-10,
 28 inclusive,

29 Defendants.

30 Judge: Hon. A. Howard Matz
 31 Ctrm: 14

32 Plaintiffs UMG Recordings, Inc., Universal Music Corp., Songs of Universal,
 33 Inc., Universal-Polygram International Publishing, Inc. and Rondor Music
 34 International, Inc. ("UMG") hereby submit their initial disclosures pursuant to
 35 Federal Rule of Civil Procedure 26(a)(1) based on information currently available to
 36 Plaintiffs.

1 A. Individuals Likely to Have Discoverable Information

2 The individuals likely to have discoverable information that Plaintiffs may
3 use to support their claims or defenses (except for information that Plaintiffs may
4 use solely for impeachment) are:

5 Cindy Oliver and/or Tegan Kossowicz (contact through UMG's counsel of
6 record) – ownership of copyrights;

7 Lawrence Kenswil and/or David Ring (contact through UMG's counsel of
8 record) – the adverse impact of MySpace's copyright infringement on UMG;

9 James Belcher (contact through UMG's counsel of record) – identification of
10 files containing copyrighted works owned and/or controlled by UMG on
11 MySpace.com;

12 Wendy Nussbaum (contact through UMG's counsel of record) – identification
13 of files containing copyrighted works owned and/or controlled by UMG on
14 MySpace.com; communications with MySpace related to infringement;

15 Jennifer Roberts (contact through UMG's counsel of record) – the
16 identification of files containing copyrighted works owned and/or controlled by
17 UMG on MySpace.com on or about the date of the filing of the complaint and
18 subsequent thereto.

19 Current and former employees of MySpace, Inc. ("MySpace") and its parent,
20 New Corporation ("News Corp.") whose identities, other than Rupert Murdoch,
21 Peter Chernin, Tom Anderson, and Chris DeWolfe, are unknown to Plaintiffs at this
22 time.

23 In addition to the foregoing, Plaintiffs' expect to identify UMG employees
24 who may have been involved in direct communications with MySpace regarding the
25 infringement of copyrighted works owned and/or controlled by UMG by MySpace
26 and MySpace.com members. UMG is in the process of identifying these individuals
27 and will promptly supplement these initial disclosures once this information is
28 known.

1 Plaintiffs' reserve the right to add or delete names from the list as information
2 becomes known to Plaintiffs concerning the matters at issue in this lawsuit,
3 including, but not limited to, the nature of certain defenses MySpace may assert in
4 its Answer.

5 **B. Documents Supporting Claims or Defenses**

6 Plaintiffs identify the following categories of documents, electronically stored
7 information and tangible things in the possession, custody, or control of Plaintiffs
8 that they may use to support their claims or defenses (except for impeachment
9 purposes):

- 10 1. Copyright registrations and related documents;
- 11 2. Publicly available documents from MySpace, including copies of
12 computer files containing UMG's copyrighted works that were found on the
13 MySpace.com website, MySpace's Terms of Use, and other related documents.
- 14 3. Communications between UMG (or others acting on its behalf) and
15 MySpace regarding the infringement of UMG's copyrighted works.
- 16 4. Publicly available documents reflecting statements from News Corp.
17 executives demonstrating, among other things, the effect of piracy, and News
18 Corp.'s (or its affiliates') control over the activities of MySpace and participation in
19 the willful infringement on the site.

20 **C. Computation of Damages**

21 The primary damages sought by UMG in this action are statutory damages in
22 an amount up to \$150,000 for each infringement identified by UMG in the course of
23 this action or UMG's damages and MySpace's and/or News Corp.'s profits. At this
24 time, UMG is unable to calculate these sums based on the information available to
25 UMG. If appropriate, UMG will supplement these disclosures regarding the
26 computation of damages.

27 **D. Insurance Agreements**

28 Not applicable.

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Dated: March 1, 2007 _____

IRELL & MANELLA LLP
Steven A. Marenberg
Elliot Brown
Benjamin Glatstein

By: 

Benjamin H. Glatstein
Attorneys for Plaintiffs
UMG Recordings, Inc., Universal
Music Corp., Songs of Universal, Inc.,
Universal-Polygram International
Publishing, Inc. and Rondor Music
International, Inc.

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PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 1800 Avenue of the Stars, Suite 900, Los Angeles, California 90067-4276.

On March 1, 2007, I served the foregoing document described as **PLAINTIFFS' INITIAL DISCLOSURES PURSUANT TO FRCP 26(a)(1)** on each interested party, as follows:

Diana M. Torres
O'Melveny & Myers LLP
400 South Hope Street
Los Angeles, CA 90071-2889
dtorres@omm.com

I caused each such envelope to be delivered by hand to the offices of each interested party.

Executed on March 1, 2007, at Los Angeles, California.

I declare under penalty of perjury that the foregoing is true and correct.

Connie Kwon
(Type or print name)

Connie Kwon

(Signature)