

1 DAVID A. STEINBERG (SBN 130593)
das@msk.com
2 AARON M. WAIS (SBN 250671)
amw@msk.com
3 BRADLEY J. MULLINS (SBN 274219)
bym@msk.com
4 MITCHELL SILBERBERG & KNUPP LLP
11377 West Olympic Boulevard
5 Los Angeles, CA 90064-1683
Telephone: (310) 312-2000
6 Facsimile: (310) 312-3100

7 Attorneys for Plaintiffs
UMG Recordings, Inc.; Roc-A-Fella Records,
8 LLC; Capitol Records, LLC; Universal Music
Corp.; Songs of Universal, Inc.; PolyGram
9 Publishing, Inc.; Universal Music – MGB NA
LLC; and Universal Music – Z Tunes LLC

10

11

UNITED STATES DISTRICT COURT

12

CENTRAL DISTRICT OF CALIFORNIA

13

14 UMG Recordings, Inc.; Roc-A-Fella
Records, LLC; Capitol Records, LLC;
15 Universal Music Corp.; Songs of
Universal, Inc.; PolyGram Publishing,
16 Inc.; Universal Music – MGB NA LLC;
and Universal Music – Z Tunes LLC

CASE NO. 2:18-cv-9709

17

Plaintiffs,

**COMPLAINT FOR COPYRIGHT
INFRINGEMENT; VIOLATION
OF CALIFORNIA CIVIL CODE
§ 980(2); VIOLATION OF
CALIFORNIA BUSINESS AND
PROFESSIONS CODE § 17200;
AND COMMON LAW UNFAIR
COMPETITION**

18

v.

Demand For Jury Trial

19

iBus Media Limited, and DOES 1
20 through 10, inclusive,

21

Defendants.

22

23 Plaintiffs UMG Recordings, Inc.; Roc-A-Fella Records, LLC; Capitol
24 Records, LLC; Universal Music Corp.; Songs of Universal, Inc.; PolyGram
25 Publishing, Inc.; Universal Music – MGB NA LLC; and Universal Music – Z
26 Tunes LLC (collectively, “Plaintiffs”), by their undersigned attorneys, for their
27 Complaint against Defendant iBus Media Limited (“iBus Media” or “Defendant”),
28 aver as follows:

PRELIMINARY STATEMENT

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1. Plaintiffs are some of the world’s leading record labels and music publishers, and are engaged in the business of acquiring, administering, licensing, and otherwise exploiting a catalog of copyrights in and to sound recordings and musical compositions, owned in whole or in part by Plaintiffs. Plaintiffs’ catalog of copyrighted musical works is extremely valuable and encompasses works composed or famously performed by a wide array of legendary songwriters and artists, including both contemporary hits and influential standards.

2. iBus Media is a global content creation and technology company that, among other things, owns and operates the website located at www.pokernews.com (“PokerNews”). PokerNews is, in turn, the self-proclaimed “largest poker media site in the world.” Among the content made available by iBus Media on PokerNews, and through other forums, are hundreds of podcasts that intentionally incorporate significant portions of Plaintiffs’ copyrighted musical works.

3. iBus Media does not have any license or other authorization from Plaintiffs to reproduce, distribute, adapt or publicly perform in the United States any of Plaintiffs’ copyrighted musical works. Accordingly, iBus Media is liable for its infringement of Plaintiffs’ copyright interests, either because it has directly engaged in infringing activities or because it is secondarily liable for infringing activities undertaken by others.

4. iBus Media surely is aware that its conduct constitutes copyright infringement, given that it is a sophisticated global operation that runs what it claims to be the largest poker website in the world. Moreover, iBus Media was notified that it was infringing Plaintiffs’ copyrighted works nearly three years ago. Nevertheless, iBus Media continues to infringe. iBus Media’s infringement is therefore willful and deliberate.

THE PARTIES

1
2 10. Plaintiff UMG Recordings, Inc. (“UMG Recordings”) is a corporation
3 duly organized and existing under the laws of the State of Delaware, with its
4 principal place of business within the County of Los Angeles, California.

5 11. Plaintiff Roc-A-Fella Records, LLC (“Roc-A-Fella”) is a limited
6 liability company duly organized and existing under the laws of the State of New
7 York, with its principal place of business within the County of Los Angeles,
8 California.

9 12. Plaintiff Capitol Records, LLC (“Capitol”) is a limited liability
10 company duly organized and existing under the laws of the State of Delaware, with
11 its principal place of business within the County of Los Angeles, California.

12 13. Plaintiffs UMG Recordings, Roc-A-Fella, and Capitol collectively are
13 referred to herein as the “Record Company Plaintiffs.”

14 14. The Record Company Plaintiffs are engaged in the business of
15 producing sound recordings and distributing, selling, and/or licensing the
16 reproduction, distribution, sale, preparation of derivative works based upon, and
17 performance of their sound recordings in phonorecords (as defined in 17 U.S.C. §
18 101), in audiovisual works, and for streaming (i.e., performing) and downloading
19 over the Internet and through other mediums. The Record Company Plaintiffs
20 invest substantial money, time, effort, and creative talent in discovering and
21 developing recording artists, and in creating, advertising, promoting, selling, and
22 licensing sound recordings embodying the performances of their exclusive
23 recording artists and their unique and valuable sound recordings.

24 15. The Record Company Plaintiffs own copyrights and/or exclusive
25 rights in and to their sound recordings including many of the most popular sound
26 recordings in the world, including by way of example, the recordings identified on
27 Schedule A hereto, incorporated herein by reference. The Record Company
28 Plaintiffs have obtained or applied for certificates of copyright registration in each

1 of the recordings, including but not limited to those identified on Schedule A. The
2 Record Company Plaintiffs also own exclusive rights in certain sound recordings,
3 including the sound recordings listed on Schedule B, for which they owns rights
4 under state law (together with the recordings listed in Schedule A, the
5 “Recordings”). As the owner of copyrights in the Recordings, the Record
6 Company Plaintiffs possess the exclusive rights, among other things, to reproduce
7 the Recordings in copies or phonorecords, to prepare derivative works based upon
8 the Recordings, to distribute copies or phonorecords of the Recordings to the
9 public, to perform the Recordings publicly by means of a digital audio
10 transmission and to license these exclusive rights, including over the Internet.

11 16. Plaintiff Universal Music Corp. (“Universal Music”) is a corporation
12 duly organized and existing under the laws of the State of Delaware, with its
13 principal place of business within the County of Los Angeles, California.

14 17. Plaintiff Songs of Universal, Inc. (“Songs of Universal”) is a
15 corporation duly organized and existing under the laws of the State of California,
16 with its principal place of business within the County of Los Angeles, California.

17 18. Plaintiff PolyGram Publishing, Inc. (“PolyGram”) is a corporation
18 duly organized and existing under the laws of the State of Delaware, with its
19 principal place of business within the County of Los Angeles, California.

20 19. Plaintiff Universal Music – MGB NA LLC (“MGB”) is a limited
21 liability company duly organized and existing under the laws of the State of
22 California, with its principal place of business within the County of Los Angeles,
23 California.

24 20. Plaintiff Universal Music – Z Tunes LLC (“Z Tunes”) is a limited
25 liability company duly organized and existing under the laws of the State of New
26 York, with its principal place of business within the County of Los Angeles,
27 California.

28

1 21. Plaintiffs Universal Music, Songs of Universal, PolyGram, MGB, and
2 Z Tunes collectively are referred to herein as the “Music Publisher Plaintiffs.”

3 22. The Music Publisher Plaintiffs are music publishers, engaged in the
4 business of acquiring, owning, publishing, administering, licensing, and otherwise
5 exploiting copyrights in musical compositions. Plaintiffs invest substantial money,
6 time, effort, and creative talent to acquire, administer, publish, license, and
7 otherwise exploit such copyrights, on their own behalves and on behalf of
8 songwriters and other music publishers with whom they have contractual
9 relationships.

10 23. The Music Publisher Plaintiffs own or administer (in whole or in part)
11 copyrights and/or exclusive rights in and to thousands of musical compositions,
12 including by way of example those compositions identified on Schedule C hereto,
13 incorporated herein by reference (the “Musical Compositions”). The Music
14 Publisher Plaintiffs have obtained or have applied for certificates of copyright
15 registrations issued by the Copyright Office in each of the Musical Compositions
16 identified on Schedule C. As the owners or administrators of copyrights (in whole
17 or in part) in these Musical Compositions, the Music Publisher Plaintiffs possess
18 the exclusive rights, among other things, to reproduce the Musical Compositions in
19 copies or phonorecords, to prepare derivative works based upon the Musical
20 Compositions, to distribute copies or phonorecords of the Musical Compositions to
21 the public, and to perform the Musical Compositions publicly.

22 24. Defendant iBus Media is company registered in the Isle of Man that
23 purports to maintain a “truly global presence” with at least five global offices,
24 including one in California. Plaintiffs are informed and believe, and on that basis
25 aver, that iBus Media is a content provider and website operator and is in the
26 business of producing, distributing, publicly performing, selling, licensing, and
27 otherwise exploiting audio and visual content. Among other things, iBus Media, or
28 its affiliated group of companies, owns and operates the website located at

1 www.pokernews.com, which is directed at and accessible throughout the United
2 States and in the State of California.

3 25. The true names and capacities, whether individual, corporate,
4 associate, or otherwise, of defendants sued herein as Does 1 through 10, inclusive,
5 are unknown to Plaintiffs, which sues said defendants by such fictitious names (the
6 “Doe Defendants”). If necessary, Plaintiffs will seek leave to amend this
7 Complaint to state their true names and capacities. Plaintiffs are informed and
8 believe, and on that basis aver, that the Doe Defendants are liable to Plaintiffs as a
9 result of their participation in all or some of the acts hereinafter set forth (all of the
10 Defendants, including the Doe Defendants, collectively are referred to as
11 “Defendants”).

12 26. Plaintiffs are informed and believe, and on that basis aver, that at all
13 times mentioned in this Complaint, each of the Defendants was the agent of each
14 of the other Defendants and, in doing the things averred in this Complaint, was
15 acting within the course and scope of such agency.

16 **FACTS APPLICABLE TO ALL CLAIMS**

17 27. iBus Media is the owner and operator of the website
18 www.pokernews.com (“PokerNews”). iBus Media describes PokerNews as “the
19 largest poker media site in the world” and “the world’s leading poker website.”
20 According to iBus Media, PokerNews is “considered to be the most complete
21 poker resource available on the internet.” PokerNews contains a great deal of
22 content, including news, videos, strategy guides, live reporting, and podcasts,
23 largely focused on the poker industry. As claimed on PokerNews itself, “visitors
24 will find a daily dose of articles with the latest poker news, live reporting from
25 tournaments, exclusive videos, podcasts and so much more.”

26 28. Pokernews contains a great deal of material that was either written or
27 otherwise prepared in the United States and California, or that is directly targeted
28 towards audiences in the United States and California. This material includes

1 coverage of poker events in California, videos filmed at events in California,
2 podcasts created or recorded in California, and articles regarding the status of
3 legalization of poker in California.

4 29. iBus Media also employs or has employed individuals in the United
5 States and California that support the operation of and creation of content for
6 Pokernews. These employees include an editor for Pokernews that is based in Los
7 Angeles, California, and multiple employees in Nevada and other locations
8 throughout the United States, including the “Head of Video and Podcasting.” iBus
9 Media also maintained an office in San Diego during the period of infringement as
10 alleged herein. iBus Media has also applied for and obtained multiple trademark
11 registrations related to PokerNews in the United States.

12 30. In addition to the website, iBus Media also owns, operates and
13 distributes a mobile application called “PokerNews.Com” (the “PokerNews App”).
14 The PokerNews App contains much of the same content available on PokerNews,
15 including the podcasts. The PokerNews App is available for download both
16 through the iTunes App Store, and the Google Play app store.

17 31. A large portion of the content available through PokerNews and the
18 PokerNews App consists of hundreds of podcasts discussing various issues relating
19 to poker.

20 32. In addition to being made available for streaming through PokerNews
21 and the PokerNews App, these podcasts are also made available to audiences in the
22 United States and California for streaming and/or download by iBus Media
23 through audioBoom, iTunes, Spotify, Google Play, and Stitcher.

24 33. In numerous of the podcasts, iBus Media incorporated significant
25 portions of Plaintiffs’ copyrighted works (the “Infringing Podcasts”). In each of
26 the Infringing Podcasts, Plaintiffs’ copyrighted works are prominently featured and
27 undoubtedly used with the intention of making the podcasts more appealing to
28 listeners.

1 34. Upon information and belief, iBus Media profits from the Infringing
2 Podcasts by, among other things, directly or indirectly pairing the Infringing
3 Podcasts with advertising or otherwise using the Infringing Podcasts to draw
4 audiences to its other profit-making enterprises.

5 35. By incorporating Plaintiffs' copyrighted works into the Infringing
6 Podcasts, and then making those Infringing Podcasts available to the public for
7 streaming and/or download, all without any license or authorization from
8 Plaintiffs, iBus Media is infringing Plaintiffs' exclusive rights to reproduce,
9 prepare derivative works based upon, distribute, and publicly perform the works
10 listed in Schedules A, B, and C incorporated herewith. This infringement includes,
11 but is not limited to, (i) adapting Plaintiffs' copyrighted works to create new,
12 unauthorized derivate works (i.e., the Infringing Podcasts); (ii) uploading the
13 Infringing Podcasts to its own computer servers and the computer servers of third-
14 party hosting services; and (iii) transmitting the Infringing Podcasts to consumers
15 of iBus Media's content via streaming digital public performance. Schedule D to
16 this Complaint, which is also incorporated herein by reference, is a representative
17 sample of the Infringing Podcasts, and also identifies the copyright work infringed
18 in each such Infringing Podcast.

19 36. While Schedule D contains hundreds of examples of infringements,
20 Plaintiffs are continuing their investigation into the scope of iBus Media's
21 infringement. Plaintiffs are informed and believe, and on that basis aver, that
22 further investigation will reveal many more sound recordings and musical
23 compositions owned and/or controlled by Plaintiffs, in whole or in part, that are
24 being unlawfully exploited by iBus Media. Plaintiffs expressly reserve the right to
25 amend this Complaint to assert additional claims for infringement of Plaintiffs'
26 copyrighted works as it uncovers such infringement during the course of discovery
27 in this action.

28

1 43. By the acts set forth above, Defendants have infringed the Record
2 Company Plaintiffs' copyrights in the Recordings, including by reproducing,
3 distributing, adapting, and digitally publicly performing the Recordings without
4 authorization, in violation of the Copyright Act, 17 U.S.C. §§ 106 and 501.

5 44. Each such infringement by Defendants of the Recordings constitutes a
6 separate and distinct act of infringement.

7 45. Defendants' acts of infringement are willful, in disregard of and with
8 indifference to the rights of the Record Company Plaintiffs.

9 46. As a direct and proximate result of the infringements by Defendants,
10 the Record Company Plaintiffs are entitled to damages and to Defendants' profits
11 in amounts to be proven at trial, and which are not currently ascertainable.

12 Alternatively, the Record Company Plaintiffs are entitled to maximum statutory
13 damages of \$150,000 for each copyright infringed, or in such other amount as may
14 be proper under 17 U.S.C. § 504(c).

15 47. The Record Company Plaintiffs further are entitled to their attorneys'
16 fees and full costs pursuant to 17 U.S.C. § 505.

17 48. As a result of Defendants' acts and conduct, the Record Company
18 Plaintiffs have sustained and will continue to sustain substantial, immediate, and
19 irreparable injury, for which there is no adequate remedy at law. The Record
20 Company Plaintiffs are informed and believe, and on that basis aver, that unless
21 enjoined and restrained by this Court, Defendants will continue to infringe the
22 Record Company Plaintiffs' rights in the Recordings. The Record Company
23 Plaintiffs are entitled to temporary, preliminary, and permanent injunctive relief to
24 restrain and enjoin Defendants' continuing infringing conduct.

25

26

27

28

COUNT II

COPYRIGHT INFRINGEMENT

[By The Music Publisher Plaintiffs Against Defendants]

1
2
3
4 49. Plaintiffs incorporate by this reference each and every averment
5 contained in paragraphs 1 through 41, inclusive.

6 50. By the acts set forth above, Defendants have infringed the Music
7 Publisher Plaintiffs' copyrights in the Musical Compositions by reproducing,
8 adapting, distributing, and publicly performing the Musical Compositions without
9 authorization, in violation of the Copyright Act, 17 U.S.C. §§ 106 and 501.

10 51. Each such infringement by Defendants of the Musical Compositions
11 constitutes a separate and distinct act of infringement.

12 52. Defendants' acts of infringement are willful, in disregard of and with
13 indifference to the rights of the Music Publisher Plaintiffs.

14 53. As a direct and proximate result of the infringements by Defendants,
15 the Music Publisher Plaintiffs are entitled to damages and to Defendants' profits in
16 amounts to be proven at trial, and which are not currently ascertainable.

17 Alternatively, the Music Publisher Plaintiffs are entitled to maximum statutory
18 damages of \$150,000 for each copyright infringed, or in such other amount as may
19 be proper under 17 U.S.C. § 504(c).

20 54. The Music Publisher Plaintiffs further are entitled to their attorneys'
21 fees and full costs pursuant to 17 U.S.C. § 505.

22 55. As a result of Defendants' acts and conduct, the Music Publisher
23 Plaintiffs have sustained and will continue to sustain substantial, immediate, and
24 irreparable injury, for which there is no adequate remedy at law. The Music
25 Publisher Plaintiffs are informed and believe, and on that basis aver, that unless
26 enjoined and restrained by this Court, Defendants will continue to infringe the
27 Music Publisher Plaintiffs' rights in the Musical Compositions. The Music

1 Publisher Plaintiffs are entitled to temporary, preliminary, and permanent
2 injunctive relief to restrain and enjoin Defendants' continuing infringing conduct.

3 **COUNT III**

4 **VIOLATION OF CALIFORNIA CIVIL CODE § 980(2)**

5 **[By The Record Company Plaintiffs Against Defendants]**

6 56. Plaintiffs incorporate by this reference each and every averment
7 contained in paragraphs 1 through 41, inclusive.

8 57. The Record Company Plaintiffs own exclusive ownership interests
9 pursuant to California Civil Code § 980(a)(2) and under the common law in and to
10 the sound recordings identified in the representative list attached hereto as
11 Schedule B, among many other such sound recordings that the Recording
12 Company Plaintiffs own and which they are informed and believe, and on that
13 basis aver, that Defendants have infringed, to be identified in discovery.

14 58. As set forth in more detail above, Defendants have, without
15 permission, reproduced and distributed the sound recordings or portions thereof in
16 podcasts as reflected on Schedule D. Additionally, the Record Company Plaintiffs
17 are informed and believe, and on that basis aver, that Defendants have, without
18 permission, reproduced, distributed, and adapted a substantial number of additional
19 sound recordings protected under state law and owned by the Record Company
20 Plaintiffs.

21 59. As a direct and proximate result of Defendants' conduct in violation
22 of the Record Company Plaintiffs' exclusive ownership interests in and to their
23 sound recordings owned pursuant to state law, Defendants have received proceeds
24 and the Record Company Plaintiffs have been damaged in an amount to be proved
25 at trial.

26 60. Defendants' conduct is causing and, unless enjoined and restrained by
27 this Court, will continue to cause the Record Company Plaintiffs great and
28 irreparable injury that cannot fully be compensated or measured in money. The

1 Record Company Plaintiffs have no adequate remedy at law. The Record
2 Company Plaintiffs are entitled to preliminary and permanent injunctions
3 prohibiting further infringements of its exclusive rights.

4 61. Defendants are guilty of oppression, fraud and/or malice and the
5 Record Company Plaintiffs, in addition to their actual damages are, by reason
6 thereof, entitled to recover exemplary and punitive damages against Defendants.

7 **COUNT IV**

8 **VIOLATION OF CALIFORNIA BUSINESS AND PROFESSIONS**
9 **CODE § 17200 AND COMMON LAW UNFAIR COMPETITION**

10 **[By The Record Company Plaintiffs Against Defendants]**

11 62. Plaintiffs incorporate by this reference each and every averment
12 contained in paragraphs 1 through 41, inclusive.

13 63. The foregoing acts and conduct of Defendants constitute
14 misappropriation, conversion, and invasion of the Record Company Plaintiffs'
15 property rights in and to the sound recordings that they own pursuant to state law
16 and which Defendants have infringed, to be identified in discovery, in addition to
17 the representative sample reflected in Schedule B hereto. The foregoing acts and
18 conduct of Defendants constitute unfair competition under California Business and
19 Professions Code § 17200 and under the common law. If necessary, the Record
20 Company Plaintiffs will amend this Complaint to add additional claims under state
21 law once the specific identities of all of the sound recordings infringed by
22 Defendants are determined, or, alternatively, will provide such information
23 pursuant to Fed. R. Civ. P. 26 and/or in discovery.

24 64. As a direct and proximate result of Defendants' conduct, the Record
25 Company Plaintiffs are entitled to recover all proceeds and other compensation
26 received or to be received by Defendants arising from their infringements of the
27 Record Company Plaintiffs' sound recordings owned pursuant to state law. The

28

1 Record Company Plaintiffs requests that the Court order Defendants to render an
2 accounting to ascertain the amount of such profits and compensation.

3 65. As a direct and proximate result of Defendants' unfair competition,
4 the Record Company Plaintiffs have been damaged and Defendants have been
5 unjustly enriched, in an amount that shall be proved at trial for which damages,
6 restitution, and/or disgorgement is appropriate. Such damages, restitution, and/or
7 disgorgement should include a declaration by this Court that Defendants are
8 constructive trustees for the benefit of the Record Company Plaintiffs and an order
9 that Defendants convey to the Record Company Plaintiffs all the gross receipts
10 received or to be received that are attributable to infringement of the Record
11 Company Plaintiffs' sound recordings owned pursuant to state law.

12 66. Defendants' conduct is causing and, unless enjoined and restrained by
13 this Court, will continue to cause the Record Company Plaintiffs' great and
14 irreparable injury that cannot fully be compensated or measured in money. The
15 Record Company Plaintiffs have no adequate remedy at law. The Record
16 Company Plaintiffs are entitled to preliminary and permanent injunctions
17 prohibiting further infringements of its exclusive rights.

18 67. Defendants are guilty of oppression, fraud and/or malice and the
19 Record Company Plaintiffs, in addition to their actual damages are, by reason
20 thereof, entitled to recover exemplary and punitive damages against Defendants.

21
22
23
24
25
26
27
28

1 WHEREFORE, Plaintiffs pray for judgment against Defendants, and each of
2 them, jointly and severally, as follows:

3 1. For a preliminary and permanent injunction enjoining and restraining
4 Defendants and their respective agents, servants, directors, officers, principals,
5 employees, representatives, subsidiaries and affiliated companies, successors,
6 assigns, and those acting in concert with them or at their direction from directly or
7 indirectly infringing in any manner any right in any and all copyrighted works (or
8 portions thereof), whether now in existence or later created, in which any Plaintiff
9 (including its parents, subsidiaries, affiliates, or distributed labels) owns or controls
10 an exclusive right under Section 106 of the United States Copyright Act (17 U.S.C.
11 § 106) or state law, including without limitation by directly or indirectly copying,
12 reproducing, downloading, distributing, communicating to the public, uploading,
13 linking to, transmitting, publicly performing, or otherwise exploiting in any
14 manner any of Plaintiffs' Recordings or Musical Compositions, including but not
15 limited to those set forth in Schedules A, B and C to the Complaint; and

16 2. On Counts I and II, for:

17 (a) Defendants' profits and damages in such amount as may be
18 determined; alternatively, for maximum statutory damages in the amount of
19 \$150,000 with respect to each copyrighted work infringed, or for such other
20 amount as may be proper pursuant to 17 U.S.C. § 504(c); and

21 (b) Plaintiffs' attorneys' fees and full costs; and

22 3. On Counts III and IV, for an accounting, the imposition of a
23 constructive trust, restitution of Defendants' unlawful proceeds, and damages
24 according to proof;

25 3. On Counts III and IV, for punitive and exemplary damages in such
26 amount as may be awarded at trial;

27 4. For prejudgment interest according to law; and

28

1 5. For such other and further relief as the Court may deem just and
2 proper.

3

4 DATED: November 16, 2018 Mitchell Silberberg & Knupp LLP

5

6

By: /s/ Aaron M. Wais
David A. Steinberg
Aaron M. Wais
Bradley J. Mullinw
Attorneys for Plaintiffs
UMG Recordings, Inc.; Roc-A-Fella
Records, LLC; Capitol Records, LLC;
Universal Music Corp.; Songs of
Universal, Inc.; PolyGram Publishing,
Inc.; Universal Music – MGB NA LLC;
and Universal Music – Z Tunes LLC

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

JURY DEMAND

Plaintiffs UMG Recordings, Inc.; Roc-A-Fella Records, LLC; Capitol Records, LLC; Universal Music Corp.; Songs of Universal, Inc.; PolyGram Publishing, Inc.; Universal Music – MGB NA LLC; and Universal Music – Z Tunes LLC hereby demand a trial by jury on all matters and issues so triable.

DATED: November 16, 2018

MITCHELL SILBERBERG & KNUPP LLP

By: /s/ Aaron M. Wais
David A. Steinberg
Aaron M. Wais
Bradley J. Mullins
Attorneys for Plaintiffs
UMG Recordings, Inc.; Roc-A-Fella Records, LLC; Capitol Records, LLC; Universal Music Corp.; Songs of Universal, Inc.; PolyGram Publishing, Inc.; Universal Music – MGB NA LLC; and Universal Music – Z Tunes LLC

EXHIBIT A

SCHEDULE A

Title	Artist	Plaintiff	Copyright Registration Number
Ain't No Love In The Heart Of The City	Bobby Bland	UMG Recordings, Inc.	N00000016419, RE0000867280
All Of The Lights	Kanye West	Roc-A-Fella Records, LLC	SR0000683430
All Star	Smash Mouth	UMG Recordings, Inc.	SR0000264519
Ba Bump	The Black Eyed Peas	UMG Recordings, Inc.	SR0000378166
Bohemian Like You	The Dandy Warhols	Capitol Records, LLC	SR0000285787
Champion	Kanye West	Roc-A-Fella Records, LLC	SR0000615020
Ch-Check It Out	Beastie Boys	Capitol Records, LLC	SR0000360352
Clap Back	Ja Rule	UMG Recordings, Inc.	SR0000345007
Drop It Like It's Hot	Snoop Dogg	UMG Recordings, Inc.	SR0000362084
Every Little Thing She Does Is Magic	The Police	UMG Recordings, Inc.	SR0000030222
Good Life	Kanye West	Roc-A-Fella Records, LLC	SR0000615020
Good Morning	Kanye West	Roc-A-Fella Records, LLC	SR0000615020
Heard 'Em Say	Kanye West	Roc-A-Fella Records, LLC	SR0000380526
Here For You	Gorgon City	UMG Recordings, Inc.	SR0000746174
Homecoming	Kanye West	Roc-A-Fella Records, LLC	SR0000615020
I Know You Got Soul	Eric B. & Rakim	UMG Recordings, Inc.	SR0000082471

SCHEDULE A

Title	Artist	Plaintiff	Copyright Registration Number
Kid Charlemagne	Steely Dan	UMG Recordings, Inc.	N00000032362, RE0000908461
Make Her Say	Kid Cudi	UMG Recordings, Inc.	SR0000641951
Money Maker	Ludacris	UMG Recordings, Inc.	SR0000398765
Mosh	Eminem	UMG Recordings, Inc.	SR0000362156
Outstanding	The Gap Band	UMG Recordings, Inc.	SR0000036081
Paradise City	Guns N` Roses	UMG Recordings, Inc.	SR0000085358
Power	Kanye West	Roc-A-Fella Records, LLC	SR0000683430
So Long Goodbye	Sum 41	UMG Recordings, Inc.	SR0000609704
The Number Song	DJ Shadow	UMG Recordings, Inc.	SR0000755373
Thought @ Work	The Roots	UMG Recordings, Inc.	SR0000314538
Touch The Sky	Kanye West	Roc-A-Fella Records, LLC	SR0000380526
What They Do	The Roots	UMG Recordings, Inc.	SR0000226398
White Wedding	Billy Idol	Capitol Records, LLC	SR0000039673
Won't Back Down	Eminem	UMG Recordings, Inc.	SR0000653572

EXHIBIT B

SCHEDULE B

Title	Artist	Plaintiff
--------------	---------------	------------------

Baba O'Riley	The Who	UMG Recordings, Inc.
Magic Carpet Ride	Steppenwolf, Philip Steir	UMG Recordings, Inc.
Pennies From Heaven	Frank Sinatra	Capitol Records, LLC
Pretty Little Angel Eyes	Curtis Lee	Capitol Records, LLC
Sweet Caroline	Neil Diamond	UMG Recordings, Inc.

EXHIBIT C

SCHEDULE C

Title	Artist	Plaintiff	Copyright Registration Number
Ain't No Love In The Heart Of The City	Bobby Bland	Universal Music Corp.	EU 513011
Kid Charlemagne	Steely Dan	Universal Music Corp.	EU 679291
Clap Back	Ja Rule	Songs of Universal, Inc.	PA 1 245 426
Ch-Check It Out	Beastie Boys	PolyGram Publishing, Inc.	PA 1 268 095
Touch The Sky	Kanye West	Universal Music - MGB NA LLC	PA 1 162 460
Sirius	The Alan Parsons Project	Universal Music - MGB NA LLC	PA-144-129
Friends In Low Places	Garth Brooks	Universal Music - MGB NA LLC	PA-485-587
I Can	Nas	Universal Music - Z Tunes LLC	PA1-262-441
We In Here	DMX	Songs of Universal, Inc., Universal Music Corp.	PA 1-389-846
Good Life	Kanye West	Universal Music - Z Tunes LLC	PA 1 935 936
Superstar	Lupe Fiasco	Universal Music - MGB NA LLC	PA 1-914-364
Magic	B.O.B.	Songs of Universal, Inc.	PA 1 731 007

SCHEDULE C

Title	Artist	Plaintiff	Copyright Registration Number
Show Goes On, The	Lupe Fiasco	Universal Music - MGB NA LLC	PA 1 740 705
All Of The Lights	Kanye West	Universal Music Corp.	PA 1 783 122
Make Her Say	Kid Cudi	Songs of Universal, Inc., Universal Music - MGB NA LLC	PA 1-692-979
Words I Never Said	Lupe Fiasco	Songs of Universal, Inc., Universal Music - MGB NA LLC	PA 1 739 113
Coming Home	Diddy-Dirty Money	Songs of Universal, Inc., Universal Music - MGB NA LLC	PA 1 751 168
Trillionaire	Bun B	Universal Music Corp., Universal Music - MGB NA LLC	PA 1 787 161
Hero	Nas	Songs of Universal, Inc., Universal Music - MGB NA LLC	PA 1-396-112
Milli, A	Lil Wayne	Universal Music - Z Tunes LLC	PA 1 395 759
One Time	Justin Bieber	Songs of Universal, Inc., Universal Music - MGB NA LLC	PA 1 816 046
Star Is Born, A	Jay-Z	Songs of Universal, Inc.	PA 1 920 104
I Want You	Common	Songs of Universal, Inc.	PA 1-629-220

SCHEDULE C

Title	Artist	Plaintiff	Copyright Registration Number
Changes	2 Pac	Universal Music Corp., Universal Music - MGB NA LLC	PA 1 070 591
Paris, Tokyo	Lupe Fiasco	Universal Music - MGB NA LLC	PA0001913904
Thugz Mansion (Nas Acoustic)	2 Pac	Universal Music - MGB NA LLC	PA0001115085
Crazy	Gnarls Barkley	Universal Music - MGB NA LLC	PA0001165223

EXHIBIT D

SCHEDULE D

	Infringing Podcast Title	Song Title	Artist
1.	2008 APT Day 2 Update	The Number Song	DJ Shadow
2.	2008 Barcelona EPT Main Event Day 1 Begins	White Wedding	Billy Idol
3.	2009 APPT Auckland: Player Party	Thought @ Work	The Roots
4.	40 Years of WSOP - Part 2 of 3	Baba O'Riley	The Who
5.	APPT Opening Party 2008	Ba Bump	The Black Eyed Peas
6.	Aussie Millions 2012: Bloopers!	Pretty Little Angel Eyes	Curtis Lee
7.	Calling the Clock on Gloria Balding - 2009 WSOP	It Takes Two	Rob Base
8.	Can you do... ?	Magic Carpet Ride	Steppenwolf, Philip Steir
9.	Daniel Negreanu la 2009 World Series Poker ROMANIAN INTERVIEW	I Know You Got Soul	Eric B. & Rakim
10.	Day 2 at the APPT Macau 2008	Outstanding	The Gap Band
11.	Drinks on Chad feat. Andy Frankenberger	I WANT YOU	Common
12.	Good Bye Amanda	So Long Goodbye	Sum 41
13.	GPI Update #8: Schemion Takes POY Lead; Selbst Breaks GPI 300 Top 10	MONEY MAKER	Ludacris
14.	GPI Update Episode #23: All Hail the King	MONEY MAKER	Ludacris
15.	Grant Levy	The Number Song	DJ Shadow
16.	High Stakes at the APT 2008	The Number Song	DJ Shadow
17.	JAQK Cellars	Pennies From Heaven	Frank Sinatra
18.	Kirk Morrison - Missing Tiffany- but Loving Barcelona	Every Little Thing She Does Is Magic	The Police
19.	LAPT Playa Conchal 2009: Andre Akkari	Paradise City	Guns N` Roses
20.	LAPT Playa Conchal 2009: Angel Guillen (Español)	Paradise City	Guns N` Roses
21.	LAPT Playa Conchal 2009: Carlos Giron	Paradise City	Guns N` Roses
22.	LAPT Playa Conchal 2009: Daniel "djaniel" Mar	Paradise City	Guns N` Roses
23.	LAPT Playa Conchal 2009: Day 2 Update	Paradise City	Guns N` Roses
24.	LAPT Playa Conchal 2009:	Paradise City	Guns N` Roses

SCHEDULE D

	Infringing Podcast Title	Song Title	Artist
	Day 3 Update		
25.	LAPT Playa Conchal 2009: Final Table Preview	Paradise City	Guns N` Roses
26.	LAPT Playa Conchal 2009: Fred Dykes Takes a Monster Lead	Paradise City	Guns N` Roses
27.	LAPT Playa Conchal 2009: Humberto & Roberto Brenes	Paradise City	Guns N` Roses
28.	LAPT Playa Conchal 2009: JC Alvarado	Paradise City	Guns N` Roses
29.	LAPT Playa Conchal 2009: Maridu Mayrinck	Paradise City	Guns N` Roses
30.	LAPT Playa Conchal 2009: Rogelio Pardo (Español)	Paradise City	Guns N` Roses
31.	LAPT Playa Conchal 2009: Rory "AJ" Graham	Paradise City	Guns N` Roses
32.	LAPT Playa Conchal 2009: Victor Ramdin	Paradise City	Guns N` Roses
33.	LAPT Playa Conchal 2009: What To Do When You Bust?	Paradise City	Guns N` Roses
34.	LAPT Playa Conchal 2009: William Reynolds	Paradise City	Guns N` Roses
35.	Planned Chaos feat. Jason Mecier and Dan O'Brien	SHOW GOES ON, THE	Lupe Fiasco
36.	Planned Chaos feat. Jason Mecier and Dan O'Brien	SUPERSTAR	Lupe Fiasco
37.	PokerNews Cup 2009: Dave Lee	All Star	Smash Mouth
38.	PokerNews Cup VIP Cruise	What They Do	The Roots
39.	PokerNews GPI Update #20: Selbst Soars	MONEY MAKER	Ludacris
40.	PokerNews GPI Update #21: The Return	MONEY MAKER	Ludacris
41.	PokerNews GPI Update #30: 2015 Kickoff	MONEY MAKER	Ludacris
42.	PokerNews GPI Update #9: Schemion Leads the Top 300; Players of the Decade	MONEY MAKER	Ludacris
43.	PokerNews GPI Update Episode #1: Intro to the Podcast, Phil Ivey Falls, and More	MONEY MAKER	Ludacris
44.	PokerNews GPI Update	MONEY MAKER	Ludacris

SCHEDULE D

	Infringing Podcast Title	Song Title	Artist
	Episode #11: O Canada		
45.	PokerNews GPI Update Episode #12: Hellmuth the Egalitarian	MONEY MAKER	Ludacris
46.	PokerNews GPI Update Episode #13: Merson's Climbing	MONEY MAKER	Ludacris
47.	PokerNews GPI Update Episode #14: New POY Leader	MONEY MAKER	Ludacris
48.	PokerNews GPI Update Episode #15: Negreanu Back on Top	MONEY MAKER	Ludacris
49.	PokerNews GPI Update Episode #16: Negreanu Plummets	MONEY MAKER	Ludacris
50.	PokerNews GPI Update Episode #18: WSOP Fantasy Poker Manger News	MONEY MAKER	Ludacris
51.	PokerNews GPI Update Episode #19: WSOP Kickoff	MONEY MAKER	Ludacris
52.	PokerNews GPI Update Episode #22: Muking it Up	MONEY MAKER	Ludacris
53.	PokerNews GPI Update Episode #24: Smith Remains On Top	MONEY MAKER	Ludacris
54.	PokerNews GPI Update Episode #25: Selbst Returns to the Top 10	MONEY MAKER	Ludacris
55.	PokerNews GPI Update Episode #26: Smith and Colman Separate	MONEY MAKER	Ludacris
56.	PokerNews GPI Update Episode #27: Colman Takes the Lead	MONEY MAKER	Ludacris
57.	PokerNews GPI Update Episode #28: Barer With Me	MONEY MAKER	Ludacris
58.	PokerNews GPI Update Episode #3: Mercier Falls Out of the Top 10; Hellmuth Takes a Hit	MONEY MAKER	Ludacris
59.	PokerNews GPI Update Episode #31: American Poker Awards	MONEY MAKER	Ludacris
60.	PokerNews GPI Update	MONEY MAKER	Ludacris

SCHEDULE D

	Infringing Podcast Title	Song Title	Artist
	Episode #32: Cookie Jar Jams		
61.	PokerNews GPI Update Episode #33: APA Recap, EPA Discussion, and More	MONEY MAKER	Ludacris
62.	PokerNews GPI Update Episode #34: Global Poker Masters Preview and More	MONEY MAKER	Ludacris
63.	PokerNews GPI Update Episode #35: Global Poker Masters Recap, New POY Leader	MONEY MAKER	Ludacris
64.	PokerNews GPI Update Episode #36: EPT Grand Final and Mispronunciations	MONEY MAKER	Ludacris
65.	PokerNews GPI Update Episode #37: We're Back!	MONEY MAKER	Ludacris
66.	PokerNews GPI Update Episode #38: Zinno Can't Extend His Lead	MONEY MAKER	Ludacris
67.	PokerNews GPI Update Episode #39: Giving Thanks	MONEY MAKER	Ludacris
68.	PokerNews GPI Update Episode #5: Daniel Negreanu Tops the POY and GPI 300	MONEY MAKER	Ludacris
69.	PokerNews GPI Update Episode #6: A Shorr Thing	MONEY MAKER	Ludacris
70.	PokerNews Podcast Episode #113: WSOP Hangover feat. Amit Makhija	WE IN HERE	DMX
71.	PokerNews Podcast Episode #117: It's Good to be King feat. Dan Smith	CHAMPION	Kanye West
72.	PokerNews Podcast Episode #117: It's Good to be King feat. Dan Smith	MILLI, A	Lil Wayne
73.	PokerNews Podcast Episode #124: The French Girl's Mine feat. Rob Salaburu	WON'T BACK DOWN	Eminem
74.	PokerNews Podcast Episode #125 Back in Vegas feat. Jonathan Aguiar	I CAN	Nas
75.	PokerNews Podcast Episode #127: The Return of Full Tilt Poker feat. Greg Merson	CHAMPION	Kanye West
76.	PokerNews Podcast Episode	HEARD 'EM SAY	Kanye West

SCHEDULE D

	Infringing Podcast Title	Song Title	Artist
	#128: Back to School feat. Jake Balsiger		
77.	PokerNews Podcast Episode #149: Ultimate Ultimatum feat. Antonio Esfandiari	ALL OF THE LIGHTS	Kanye West
78.	PokerNews Podcast Episode #153: Welcome to the 2013 WSOP	SIRIUS	The Alan Parsons Project
79.	PokerNews Podcast Episode #174: Darwin Moon is on the Lineup feat. Nolan Dalla	TOUCH THE SKY	Kanye West
80.	PokerNews Podcast Episode #178: EPT Barcelona feat. Steven Silverman and Daniel Negreanu	AIN'T NO LOVE IN THE HEART OF THE CITY	Bobby Bland
81.	PokerNews Podcast Episode #189: No Oatmeal for You feat. Mohsin Charania	HOMECOMING	Kanye West
82.	PokerNews Podcast Episode #203: The Nug Life feat. Ty Stewart	THUGZ MANSION (NAS ACOUSTIC)	2 Pac
83.	PokerNews Podcast Episode #227 feat. Matt Glantz	Touch The Sky	Kanye West
84.	PokerNews Podcast Episode #227: Cream to the Crop feat. Matt Glantz	TOUCH THE SKY	Kanye West
85.	PokerNews Podcast Episode #232: One Drop Reaction feat. David Williams	HERO	Nas
86.	PokerNews Podcast Episode #235: R-E-S-P-E-C-T	DROP IT LIKE IT'S HOT	Snoop Dogg
87.	PokerNews Podcast Episode #244: Bad News Bureaucracy	DROP IT LIKE IT'S HOT	Snoop Dogg
88.	PokerNews Podcast Episode #263: Vote or Die feat. Mukul Pahuja, Jason Mercier, and Jennifer Shahade	CHANGES	2 Pac
89.	PokerNews Podcast Episode #282: Mizzi Binks	DROP IT LIKE IT'S HOT	Snoop Dogg
90.	PokerNews Podcast Episode 100: Celebration feat. Andy Frankenger	TOUCH THE SKY	Kanye West
91.	Pokernews podcast November 4th, 2010	TOUCH THE SKY	Kanye West
92.	PokerNews Podcast: \$50K	CHAMPION	Kanye West

SCHEDULE D

	Infringing Podcast Title	Song Title	Artist
	Poker Player's Championship		
93.	PokerNews Podcast: Back, Bust and Bounce feat. Blair Hinkle	MILLI, A	Lil Wayne
94.	PokerNews Podcast: Bankroll Management feat. Jean-Robert Bellande	POWER	Kanye West
95.	PokerNews Podcast: Black Friday Anniversary feat. Samuel Chartier	GOOD MORNING	Kanye West
96.	PokerNews Podcast: Boom! Kristy is a MiniFTOPS Champion! (feat. Deuces Cracked's Jay Rosenkratz)	CHAMPION	Kanye West
97.	PokerNews Podcast: Boom! Kristy is a MiniFTOPS Champion! (feat. Deuces Cracked's Jay Rosenkratz)	KID CHARLEMAGNE	Steely Dan
98.	PokerNews Podcast: Boom! Kristy is a MiniFTOPS Champion! (feat. Deuces Cracked's Jay Rosenkratz)	TRILLIONAIRE	Bun B
99.	PokerNews Podcast: EPT San Remo feat. Lex Veldhuis	I WANT YOU	Common
100.	PokerNews Podcast: Friday feat. Ty Stewart	CRAZY	Gnarls Barkley
101.	PokerNews Podcast: Frolf feat. Randall Flowers	COMING HOME	Diddy-Dirty Money
102.	PokerNews Podcast: Get Your Ass On The Internet feat. Victor Ramdin	WON'T BACK DOWN	Eminem
103.	PokerNews Podcast: Have No Mercier feat. Lauren Kling	GOOD MORNING	Kanye West
104.	PokerNews Podcast: Midwestern Poker feat. Eric "basebaldy" Baldwin	FRIENDS IN LOW PLACES	Garth Brooks
105.	PokerNews Podcast: Monkey Tilt feat. Randy Lew and Adam Geyer	CLAP BACK	Ja Rule
106.	PokerNews Podcast: November Nine Dinner Break Special	SIRIUS	The Alan Parsons Project
107.	PokerNews Podcast: Planet...arium feat. Jay Rosenkrantz	TOUCH THE SKY	Kanye West

SCHEDULE D

	Infringing Podcast Title	Song Title	Artist
108.	PokerNews Podcast: Point and Grab featuring Tony G	WORDS I NEVER SAID	Lupe Fiasco
109.	PokerNews Podcast: Rio Rookie feat. Zach Gruneberg	STAR IS BORN, A	Jay-Z
110.	PokerNews Podcast: Run Ashton, Run feat. Ashton Griffin and Mer Brit	CLAP BACK	Ja Rule
111.	PokerNews Podcast: Songified feat. Andre Akkari	CH-CHECK IT OUT	Beastie Boys
112.	PokerNews Podcast: Super Maria feat. Maria Ho	GOOD LIFE	Kanye West
113.	PokerNews Podcast: Super Maria feat. Maria Ho	MAKE HER SAY	Kid Cudi
114.	PokerNews Podcast: Super Maria feat. Maria Ho	PARIS, TOKYO	Lupe Fiasco
115.	PokerNews Podcast: That's Not a Knife feat. Maria Ho	CLAP BACK	Ja Rule
116.	PokerNews Podcast: The Big Event feat. Chris MoneyMaker	MONEY MAKER	Ludacris
117.	PokerNews Podcast: UB Layoffs feat. Maria Ho	MAGIC	B.O.B.
118.	PokerNews Podcast: Wash Your Ball Pits feat. Andrew Seidman	MOSH	Eminem
119.	PokerNews Podcast: We Will Rock You feat. Daniel Negreanu	CLAP BACK	Ja Rule
120.	PokerNews Podcast: We'll Do it Live! 2011 WSOP Preview Show	HOME COMING	Kanye West
121.	Remko Report Episode #1: Ryan Riess	TOUCH THE SKY	Kanye West
122.	Remko Report Episode #10: Hermance Blum and Frank Op de Woerd	TOUCH THE SKY	Kanye West
123.	Remko Report Episode #11: Dong Kim	TOUCH THE SKY	Kanye West
124.	Remko Report Episode #11: Vanessa Rousso	TOUCH THE SKY	Kanye West
125.	Remko Report Episode #13: REG Charity	TOUCH THE SKY	Kanye West
126.	Remko Report Episode #14: Fatima Moreira de Melo	TOUCH THE SKY	Kanye West

SCHEDULE D

	Infringing Podcast Title	Song Title	Artist
127.	Remko Report Episode #15: Jason Wheeler	TOUCH THE SKY	Kanye West
128.	Remko Report Episode #16: Jason Les	TOUCH THE SKY	Kanye West
129.	Remko Report Episode #17: Shannon Shorr	TOUCH THE SKY	Kanye West
130.	Remko Report Episode #18: Brian Rast	TOUCH THE SKY	Kanye West
131.	Remko Report Episode #19: Eli Elezra	TOUCH THE SKY	Kanye West
132.	Remko Report Episode #2: Danny McDonagh	TOUCH THE SKY	Kanye West
133.	Remko Report Episode #2: Jorryt van Hoof	TOUCH THE SKY	Kanye West
134.	Remko Report Episode #20: Norman Chad	TOUCH THE SKY	Kanye West
135.	Remko Report Episode #21: Nolan Dalla	TOUCH THE SKY	Kanye West
136.	Remko Report Episode #22: Talal Shakerchi	TOUCH THE SKY	Kanye West
137.	Remko Report Episode #23: November Niner Max Steinberg	TOUCH THE SKY	Kanye West
138.	Remko Report Episode #4: Terrence Chan	TOUCH THE SKY	Kanye West
139.	Remko Report Episode #5: Jason Koon	TOUCH THE SKY	Kanye West
140.	Remko Report Episode #6: Noah Schwartz	TOUCH THE SKY	Kanye West
141.	Remko Report Episode #7: Daniel Negreanu	TOUCH THE SKY	Kanye West
142.	Remko Report Episode #8: George Danzer	TOUCH THE SKY	Kanye West
143.	Remko Report Episode #9: Mike Leah	TOUCH THE SKY	Kanye West
144.	Roger Sanchez Live at Teatre Principal Barcelona 2014 Part 2	Here For You	Gorgon City
145.	Strategy With Kristy feat. Jesse Martin	I CAN	Nas
146.	Strategy With Kristy feat. Lauren Kling	I CAN	Nas
147.	Strategy With Kristy feat. Paul Berende and Sorel Mizzi	I CAN	Nas

SCHEDULE D

	Infringing Podcast Title	Song Title	Artist
148.	Strategy with Kristy Podcast Part 2 with Tommy Angelo	I CAN	Nas
149.	Strategy with Kristy Podcast: Adrienne Rowsome Discusses Seven-Card Stud Eight-or-Better	I CAN	Nas
150.	Strategy With Kristy Podcast: Nick Rampone	I CAN	Nas
151.	Strategy with Kristy Podcast: Observations of Successful Live Pros	I CAN	Nas
152.	Strategy With Kristy Podcast: Team PokerStars Online's Mickey Petersen	I CAN	Nas
153.	Strategy with Kristy: A Must Listen Before WSOP Main Event with Jared Tendler	I CAN	Nas
154.	Strategy With Kristy: Aaron Jones	I CAN	Nas
155.	Strategy With Kristy: Aaron Jones Part II	I CAN	Nas
156.	Strategy with Kristy: Aaron Steinberg Discusses Poker Psychology Coaching	I CAN	Nas
157.	Strategy With Kristy: Alec Torelli	I CAN	Nas
158.	Strategy With Kristy: Alec Torelli Part II	I CAN	Nas
159.	Strategy With Kristy: Amanda Musumeci	I CAN	Nas
160.	Strategy with Kristy: Andrew "BalugaWhale" Seidman pt. II	I CAN	Nas
161.	Strategy With Kristy: Andrew Brokos	I CAN	Nas
162.	Strategy With Kristy: Andrew Robl	I CAN	Nas
163.	Strategy With Kristy: Andrew Seidman talks MTTs	I CAN	Nas
164.	Strategy With Kristy: APPT Seoul	I CAN	Nas
165.	Strategy with Kristy: Ari Engel Discusses Tournament Strategy	I CAN	Nas
166.	Strategy With Kristy: Ben	I CAN	Nas

SCHEDULE D

	Infringing Podcast Title	Song Title	Artist
	Wilinofsky		
167.	Strategy With Kristy: Blair Hinkle	I CAN	Nas
168.	Strategy With Kristy: Chris George	I CAN	Nas
169.	Strategy With Kristy: Christina Lindley	I CAN	Nas
170.	Strategy With Kristy: Cylus Watson	I CAN	Nas
171.	Strategy with Kristy: Danielle Andersen Discusses Longevity and Balance in Poker	I CAN	Nas
172.	Strategy with Kristy: Darren Rabinowitz on Break in Aussie Millions Main Event	I CAN	Nas
173.	Strategy With Kristy: Darryll Fish	I CAN	Nas
174.	Strategy With Kristy: Darryll Fish Talks WPT Lucky Hearts Poker Open	I CAN	Nas
175.	Strategy With Kristy: David "Doc" Sands	I CAN	Nas
176.	Strategy With Kristy: David Randall	I CAN	Nas
177.	Strategy With Kristy: David Randall at WSOP	I CAN	Nas
178.	Strategy With Kristy: David Randall Discusses Deep Run	I CAN	Nas
179.	Strategy With Kristy: Denny Man	I CAN	Nas
180.	Strategy With Kristy: Easy Game feat. Andrew "BalugaWhale" Seidman	I CAN	Nas
181.	Strategy With Kristy: EPT Barcelona feat. Mike McDonald and Mike Watson	I CAN	Nas
182.	Strategy With Kristy: EPT Grand Final feat. Daniel Negreanu, Randy Lew, and Mickey Petersen	I CAN	Nas
183.	Strategy With Kristy: Eric Froehlich	I CAN	Nas
184.	Strategy With Kristy: Floating OOP feat. Reid	I CAN	Nas

SCHEDULE D

	Infringing Podcast Title	Song Title	Artist
	Young		
185.	Strategy With Kristy: Frank Rusnak	I CAN	Nas
186.	Strategy with Kristy: Galen Hall Talks About How to Get Better at Poker Quickly	I CAN	Nas
187.	Strategy With Kristy: Griffin Benger	I CAN	Nas
188.	Strategy With Kristy: Gus Voelzel	I CAN	Nas
189.	Strategy With Kristy: Jared Bleznick	I CAN	Nas
190.	Strategy With Kristy: Jared Tendler	I CAN	Nas
191.	Strategy With Kristy: Jared Tendler	I CAN	Nas
192.	Strategy With Kristy: Jared Tendler Part II	I CAN	Nas
193.	Strategy With Kristy: Jason Koon	I CAN	Nas
194.	Strategy With Kristy: Jason Koon	I CAN	Nas
195.	Strategy with Kristy: Jason Lavalley Discusses a Queen-High Call	I CAN	Nas
196.	Strategy With Kristy: Jason Somerville	I CAN	Nas
197.	Strategy With Kristy: Jaymes Rosenthal, Berk Brown, and Jon Hemmer	I CAN	Nas
198.	Strategy With Kristy: John Kim Part I	I CAN	Nas
199.	Strategy With Kristy: John Kim Part II	I CAN	Nas
200.	Strategy With Kristy: John Racener	I CAN	Nas
201.	Strategy With Kristy: Johnny Lodden and Theo Jorgensen	I CAN	Nas
202.	Strategy With Kristy: Jonathan Little	I CAN	Nas
203.	Strategy With Kristy: Jonathan Little Returns	I CAN	Nas
204.	Strategy With Kristy: Kane Kalas	I CAN	Nas

SCHEDULE D

	Infringing Podcast Title	Song Title	Artist
205.	Strategy with Kristy: Kristy Discusses Poker Night in America Experience	I CAN	Nas
206.	Strategy With Kristy: Live Cash Games feat. Andrew Moreno and Lincoln Garner	I CAN	Nas
207.	Strategy With Kristy: Live Cash Games Pt. III feat. Nick DiVella	I CAN	Nas
208.	Strategy With Kristy: Live Cash Games Pt. IV feat. Matt Mercurio and Berk Brown	I CAN	Nas
209.	Strategy With Kristy: Max Steinberg	I CAN	Nas
210.	Strategy With Kristy: Max Steinberg discusses deep runs at the WSOP	I CAN	Nas
211.	Strategy with Kristy: Max Steinberg Talks About Busting Phil Ivey in the WSOP Main Event	I CAN	Nas
212.	Strategy with Kristy: Melanie Weisner Analyzes Hands from WSOP	I CAN	Nas
213.	Strategy With Kristy: Mental Game of Poker 2 feat. Jared Tendler	I CAN	Nas
214.	Strategy With Kristy: Mike "Timex" McDonald	I CAN	Nas
215.	Strategy With Kristy: Mike McDonald Part 1	I CAN	Nas
216.	Strategy with Kristy: Mike Watson Discusses Playing Big Stacks	I CAN	Nas
217.	Strategy With Kristy: Nick DiVella	I CAN	Nas
218.	Strategy With Kristy: Nick DiVella	I CAN	Nas
219.	Strategy With Kristy: Nick Rampone Part 2	I CAN	Nas
220.	Strategy with Kristy: Nikolai Yakovenko Discusses Open Face Chinese Poker Strategy Part 1	I CAN	Nas
221.	Strategy with Kristy: Nikolai	I CAN	Nas

SCHEDULE D

	Infringing Podcast Title	Song Title	Artist
	Yakovenko Discusses Open Face Chinese Poker Strategy Part 2		
222.	Strategy With Kristy: Nikolai Yakovenko Discusses Pineapple Open-Face Chinese Poker	I CAN	Nas
223.	Strategy With Kristy: Olivier Busquet	I CAN	Nas
224.	Strategy With Kristy: Open Face Chinese Poker feat. Jason Mercier and Shaun Deeb	I CAN	Nas
225.	Strategy With Kristy: Paul Volpe	I CAN	Nas
226.	Strategy With Kristy: Penultimate Episode with Andrew Seidman	I CAN	Nas
227.	Strategy With Kristy: Phil Collins	I CAN	Nas
228.	Strategy With Kristy: Phil Collins on MTTs	I CAN	Nas
229.	Strategy With Kristy: PLO with Lex Veldhuis	I CAN	Nas
230.	Strategy with Kristy: Poker Math Part 1	I CAN	Nas
231.	Strategy with Kristy: Poker Math Part 2 with Aaron Wilt	I CAN	Nas
232.	Strategy With Kristy: Prepping for the WSOP	I CAN	Nas
233.	Strategy With Kristy: Quinn Sivage	I CAN	Nas
234.	Strategy With Kristy: Quinn Sivage Pt. II	I CAN	Nas
235.	Strategy With Kristy: Ramzi Jelassi	I CAN	Nas
236.	Strategy With Kristy: Randal Flowers	I CAN	Nas
237.	Strategy With Kristy: Reid Young	I CAN	Nas
238.	Strategy With Kristy: Reid Young Part II	I CAN	Nas
239.	Strategy With Kristy: Ronit Chamani	I CAN	Nas

SCHEDULE D

	Infringing Podcast Title	Song Title	Artist
240.	Strategy With Kristy: Ryan "golfa" D'Angelo	I CAN	Nas
241.	Strategy With Kristy: Staking With Daniel Negreanu and Jason Somerville	I CAN	Nas
242.	Strategy With Kristy: Taxes	I CAN	Nas
243.	Strategy With Kristy: Terrence Chan	I CAN	Nas
244.	Strategy With Kristy: The Final Episode feat. Andrew Seidman	I CAN	Nas
245.	Strategy With Kristy: Timothy Adams	I CAN	Nas
246.	Strategy With Kristy: Tommy Angelo pt. I	I CAN	Nas
247.	Strategy With Kristy: Traveling feat. Vanessa Rousso, Lex Veldhuis, and Liv Boeree	I CAN	Nas
248.	Strategy with Kristy: Two Hands from the One Drop High Roller	I CAN	Nas
249.	Strategy with Kristy: WiltOnTilt Part I	I CAN	Nas
250.	Strategy with Kristy: WSOP Quickie with Darryll Fish	I CAN	Nas
251.	Timoshenko Wins!!!	The Number Song	DJ Shadow
252.	Welcome to the 2009 PokerStars.net LAPT Playa Conchal	Paradise City	Guns N` Roses
253.	World Series of BBQ and Lederer Charity Tournament	Sweet Caroline	Neil Diamond