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27 HAROLD ARLEN TRUST

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SA MUSIC, LLC and HAROLD ARLEN TRUST,
Plaintiffs,

v.

APPLE INC., AMAZON.COM, INC., AMAZON
DIGITAL SERVICES LLC, GOOGLE INC., GOOGLE
LLC, MICROSOFT CORPORATION, PANDORA
MEDIA, INC., THE ORCHARD ENTERPRISES,
INC., ORCHARD ENTERPRISES NY, INC.,
BELIEVE, BELIEVE, SAS, BELIEVE DIGITAL SAS,
ISOLATION NETWORK, INC. d/b/a INGROOVES,
SECOND WIND DIGITAL, THE STATE51
CONSPIRACY LTD, NAXOS OF AMERICA, INC.,
PHONOFIL AS, ADASAM LIMITED,

Case No.

**COMPLAINT
FOR COPYRIGHT
INFRINGEMENT
AND JURY DEMAND**

1 CLEOPATRA RECORDS, INC., PICKWICK GROUP
 2 LIMITED, CUGATE LTD., WNTS, IDEAL MUSIC,
 3 SHAMI MEDIA INC., BLUE SOUNDS, TVP, INC., J.
 4 JOES J. EDIZIONI MUSICALI, MARATHON
 5 MEDIA INT. LTD., THOMAS COLLEY, BEST
 6 RECORDS, WERNER LAST'S FAVOURITES JAZZ,
 7 BROKEN AUDIO, RELOADED MUSIC, VINTAGE
 8 MUSIC SL, ACROBAT MUSIC LTD., FUTURE
 9 NOISE MUSIC LIMITED, PINK DOT,
 10 PRIMEPHONIC USA INC., DWK RECORDS,
 11 SENDDIGITAL, CTS DIGITAL, MICHAEL
 12 BENNETT, AP MUSIC LTD, JAZZSENTIAL,
 13 HASMICK PROMOTIONS LIMITED, HENRY
 14 HADAWAY ORGANIZATION LIMITED,
 15 ENTERTAIN ME LTD., OVC MEDIA, MACH60
 16 MUSIC, AVID GROUP, IMPRESSIONS, GRALIN
 17 MUSIC, JAZZ CO., MOVE, XELON
 18 ENTERTAINMENT PTY. LTD., CHERISHED
 19 RECORDS, RAILROAD, VINTAGE RECORDS,
 20 PLENTY JAZZ RECORDS, JAZZ MOON,
 21 FAVORITE CLASSICS, HISTORICAL JAZZ,
 22 RARITY MUSIC, LIONFISH MUSIC, LLC, TRITON,
 23 SMITH & CO B.V., BRISA RECORDS, CLASSICS,
 24 ROBA MUSIC VERLAG GMBH, BACCI BROS
 25 RECORDS, DIGITAL GRAMOPHONE, PLAZA
 26 MAYOR COMPANY LIMITED, BLARICUM C.D.
 27 COMPANY (B.C.D.) BV, and John Doe Distributors
 28 and John Doe Pirate Labels 1–10,

Defendants.

Introduction

1. This case is about massive music piracy operations in the digital music stores and streaming services of some of the largest tech companies in the world. Apple, Amazon, Google, Microsoft, and Pandora and their distributors have joined with notorious music pirates to sell and stream thousands of pirated recordings embodying copyrighted musical works owned by plaintiffs SA Music, LLC and the Harold Arlen Trust ("Plaintiffs").

2. Plaintiffs are the legal and/or beneficial copyright owners of musical works authored by Harold Arlen, a premier composer of American music. Arlen wrote and co-wrote some of the most popular modern songs, including *Over the Rainbow* from The Wizard of Oz and many other seminal works in the American

1 songbook, including *I've Got the World on a String*, *Stormy Weather*, *The Devil and*
2 *the Deep Blue Sea*, *Come Rain or Come Shine*, *Get Happy*, *Ill Wind* and *It's Only A*
3 *Paper Moon*. A list of Plaintiffs' copyrighted compositions at issue in this case is
4 annexed as Exhibit A (the "Subject Compositions").

5 3. Arlen's masterpieces have been recorded by the most prominent jazz
6 and popular artists of all time, including Art Tatum, Benny Goodman, Billie
7 Holliday, Cab Calloway, Charlie Parker, Coleman Hawkins, Count Basie, Dizzy
8 Gillespie, Duke Ellington, Ella Fitzgerald, Etta James, Frank Sinatra, John Coltrane,
9 Lena Horne, Louis Armstrong, Miles Davis, Ray Charles, and Sarah Vaughan to
10 name only a few. These monumental works of art are, quite literally, national
11 treasures.

12 4. These and other recordings of Arlen's musical works have been pirated
13 by the Defendants in this case. They are players in the digital music business that
14 participate in, and jointly profit from, making digital phonorecord deliveries, (*i.e.*,
15 downloads and interactive streams), of pirated recordings of the Subject
16 Compositions.

17 5. Digital phonorecord deliveries of musical recordings constitute a
18 reproduction and distribution of the musical work embodied in the digital recording
19 and require a negotiated license from the copyright owner of the musical
20 composition, sometimes referred to as a "mechanical license."

21 6. Defendants have failed to obtain any license that would authorize them
22 to reproduce, distribute, sell or stream the pirated recordings of the Subject
23 Compositions and, as a result, Defendants have infringed Plaintiffs' exclusive rights
24 of reproduction and distribution of the Subject Compositions, under 17 U.S.C. §§
25 106(1) and 106(3).

1 7. Further, the activity of making digital phonorecord deliveries of pirated
2 recordings of the Subject Compositions does not qualify for a compulsory license
3 under Section 115 of the Copyright Act.

4 8. A list of the pirated recordings of the Subject Compositions that
5 Defendants have reproduced and distributed without authorization, including by
6 making digital phonorecord deliveries, and various methods of reproduction and
7 distribution, thus far identified, is set forth in the Infringement Chart annexed as
8 Exhibit B.

9 9. Over 6,000 pirated recordings of the Subject Compositions have been
10 separately reproduced and distributed as digital phonorecord deliveries by
11 Defendants as set forth in the Infringement Chart annexed as Exhibit B. Defendants
12 have infringed these works in concerted and distinct distribution chains, each of
13 which gives rise to an award for statutory damages under the Copyright Act.

14 10. To put this case in context, in 2007, Jammie Thomas-Rasset, a single
15 mother of four in Brainerd, Minnesota, was found liable, after three separate jury
16 trials, for copyright infringement for using file sharing software that enabled the
17 unauthorized downloading and distribution of 24 recordings by the Goo Goo Dolls
18 and Def Leppard, among others. The juries awarded statutory damages in all three
19 trials of up to \$80,000 per infringement. The Eighth Circuit Court of Appeals
20 ultimately affirmed statutory damages in the amount of \$9,250 for each infringed
21 recording, for a total award of \$222,000. Ms. Thomas-Rasset declared bankruptcy
22 as she had “no other option.”

23 11. In 2009, Joel Tenenbaum, a Massachusetts college student, who also
24 used file-sharing software that permitted others to download 30 recordings by Limp
25 Bizkit and Blink-182, was found liable and the jury awarded statutory damages of
26 \$22,500 per recording, for a judgment that totaled \$675,000 forcing Mr. Tenenbaum
27 to file for Chapter 7 bankruptcy.

28

1 12. Unlike Ms. Thomas-Rassett and Mr. Tenenbaum who were not alleged
2 to have sold their infringing recordings or profited from their conduct, Defendants in
3 this case have engaged in massive music piracy operation for the purpose of
4 generating profits from their sales and streams of pirated recordings and by other
5 means.

6 13. The copyright infringement operation detailed in this Complaint is only
7 the latest in a long line of piracy schemes that have plagued composers, publishers,
8 and record labels since the inception of the music industry over 100 years ago, when
9 the perforated rolls used by player pianos to perform musical works were pirated.
10 See *Aeolian Co. v. Royal Music Co.*, 196 F. 926 (W.D.N.Y. 1912).

11 14. As the technology employed by the music industry to reproduce
12 musical works advanced, bootlegging efforts by music pirates kept pace. In the
13 1960s and 1970s, organized criminal enterprises engaged in record and tape piracy
14 operations on a scale that is dwarfed by the infringing conduct explained herein.
15 Like the Defendants in this case, the “tape pirates” and “record pirates” of years past
16 unlawfully duplicated popular pre-existing recordings, and then claimed their
17 liability was limited by the compulsory license provision of the 1909 Copyright Act,
18 Section 1(e).

19 15. The landmark case *Duchess Music Corp. v. Stern*, 458 F.2d 1305 (9th
20 Cir. 1972) settled the issue as to whether tape pirates could limit their liability for
21 piracy under the compulsory license provision of the 1909 Copyright Act. In
22 *Duchess*, the defendant tape pirate engaged in the same conduct identified in this
23 Complaint, and claimed her conduct was lawful because the compulsory license
24 provision of the Copyright Act authorized the reproduction and distribution of the
25 musical works embodied on the recordings she pirated. The Ninth Circuit rejected
26 the argument, stating, “She may not continue her piracy under the flag of
27 compulsory licensing.” The *Duchess* court concluded that the tape pirates’ activity
28

1 was ineligible for a compulsory license and that reproduction of a musical
2 composition on a pirated recording infringed the copyright in the composition, even
3 when a compulsory license was claimed.¹

4 16. The holding in *Duchess* was codified when the Copyright Act was
5 revised in 1976. The statutory bar against compulsory licensing of pirated
6 recordings continues in the recent amendments to Section 115 of the Copyright Act,
7 which provides that reproduction and distribution of pirated sound recordings is an
8 activity that is ineligible for a compulsory license.

9 17. Defendants are nothing more than modern tape pirates flying the flag of
10 compulsory licensing. Their conduct constitutes willful copyright infringement of
11 the Subject Compositions in violation of the United States Copyright Act [17 U.S.C.
12 §§ 101, 106, 115, 501, 602 *et seq.*] (the “Copyright Act”).

13 **The Parties**

14 18. Plaintiff SA Music, LLC is a Nevada limited liability company and
15 Sam Arlen is the sole member of the company.

16 19. Plaintiff Harold Arlen Trust is a trust created by Harold Arlen in his
17 will. Sam Arlen is the beneficiary of the trust.

18 20. Defendant Apple, Inc. (“Apple”) is a California corporation with a
19 principal place of business in Cupertino, California.

20 21. Defendant Amazon.com, Inc. is a Delaware corporation with its
21 principal place of business in Seattle, Washington.

22 22. Defendant Amazon Digital Services LLC is a Delaware limited liability
23 corporation with its principal place of business in Seattle, Washington and

24
25 ¹ The criminal conduct of “tape pirates” became a priority of the Attorney General of the United States,
26 Edward H. Levi, in 1975 when the Justice Department determined that decisions reached by four Circuit Courts of
27 Appeals, including the Ninth Circuit in *Duchess*, rendered tape pirates criminally liable even where the statutory
28 royalty was tendered. See *Heilman v. Levi*, 391 F.Supp. 1106 (E.D.Wisc. 1975). Criminal copyright infringement
sentences continue to this day. See *Matter of Zaragoza-Vaquero*, 26 I&N Dec. 814 (BIA 2016)(defendant sentenced
to 33 months in prison and ordered to be removed from the United States for selling bootleg copies of music CDs at a
Florida flea market, as a crime involving moral turpitude).

1 authorized to do business in California. Defendants Amazon.com, Inc. and
2 Defendant Amazon Digital Services LLC shall be referred to collectively as
3 “Amazon.”

4 23. Defendant Google, Inc. is a Delaware corporation with its principal
5 place of business in Mountain View, California.

6 24. Google LLC is a limited liability company organized under the laws of
7 the State of Delaware with its principal place of business in Mountain View,
8 California. Defendants Google, Inc. and Google LLC shall be referred to
9 collectively as “Google.”

10 25. Defendant Microsoft Corporation (“Microsoft”) is a Washington
11 corporation with its principal place of business at One Microsoft Way, Redmond,
12 Washington and authorized to do business in California.

13 26. Defendant Pandora Media, Inc. (“Pandora”) is a Delaware Corporation
14 with its principal place of business at 2101 Webster Street, Suite 1650, Oakland, CA
15 94612.

16 27. Upon information and belief, Defendant The Orchard Enterprises, Inc.
17 is a corporation organized under the laws of Delaware with a principal place of
18 business at 11444 W Olympic Blvd, Los Angeles, CA.

19 28. Upon information and belief, Defendant Orchard Enterprises, NY, Inc.
20 is a corporation organized under the laws of New York with a principal place of
21 business at 11444 W Olympic Blvd, Los Angeles, CA. Defendants The Orchard
22 Enterprises, Inc. and Orchard Enterprises, NY, Inc. shall be referred to herein as
23 “Orchard.”

24 29. Upon information and belief, Defendant Believe is a business entity
25 organized under the laws of France with a principal place of business at 2 Place du
26 Colonel Fabien, Paris, France.

1 30. Upon information and belief, Defendant Believe, SAS is a business
2 entity organized under the laws of France with a principal place of business at 2
3 Place du Colonel Fabien, Paris, France.

4 31. Upon information and belief, Defendant Believe Digital SAS is a
5 business entity organized under the laws of France with a principal place of business
6 at 2 Place du Colonel Fabien, Paris, France. Defendants Believe, Believe, SAS, and
7 Believe Digital, SAS shall be referred to as “Believe Digital.”

8 32. Upon information and belief, Defendant Isolation Network, Inc. d/b/a
9 INgrooves (“INGrooves”) is a corporation organized under the laws of California
10 with a principal place of business at 15821 Ventura Blvd # 420, Encino, CA.

11 33. Upon information and belief, Defendant Second Wind Digital is a
12 business entity organized under the laws of United Kingdom with a principal place
13 of business at 34 Trinity Crescent, London, UK.

14 34. Upon information and belief, Defendant The State51 Conspiracy Ltd
15 (“State51”) is a business entity organized under the laws of United Kingdom with a
16 principal place of business at 17 Hereford Street, London, UK.

17 35. Upon information and belief, Defendant Naxos of America, Inc. is a
18 corporation organized under the laws of Tennessee with a principal place of
19 business at 1810 Columbia Avenue Suite 28, Franklin, Tennessee.

20 36. Upon information and belief, Defendant Phonofile AS is a business
21 entity organized under the laws of Norway with a principal place of business at
22 Storgata 7 NO-0155, Oslo, Norway.

23 37. Upon information and belief, Defendant Adasam Limited is a business
24 entity organized under the laws of United Kingdom with a principal place of
25 business at The Allbrite Building, Darley Dale Road, Corby, Northamptonshire,
26 UK.

1 38. Upon information and belief, Defendant Cleopatra Records, Inc. is a
2 corporation organized under the laws of California with a principal place of business
3 at 11041 Santa Monica Blvd, Los Angeles, CA.

4 39. Upon information and belief, Defendant Pickwick Group Limited is a
5 business entity organized under the laws of United Kingdom with a principal place
6 of business at Suite 1 Second Floor - Merritt House, Hill Avenue, Buckinghamshire,
7 UK.

8 40. Upon information and belief, Defendant Cugate Ltd. is a business
9 entity organized under the laws of Germany with a principal place of business at
10 Belziger Str. 72, Berlin, Germany.

11 41. Upon information and belief, Defendant Shami Media Inc. is a
12 corporation organized under the laws of New York with a principal place of
13 business at 265 West 37th Street, New York, NY.

14 42. Upon information and belief, Defendant Blue Sounds is a business
15 entity organized under the laws of Spain with a principal place of business at 26
16 Carrer de Benet i Mateu, Barcelona, Spain.

17 43. Upon information and belief, Defendant TVP, Inc. is a business entity
18 organized under the laws of Florida with a principal place of business at 701 NE
19 195th St, Miami, Florida.

20 44. Upon information and belief, Defendant J. Joes J. Edizioni Musicali is
21 a business entity organized under the laws of Italy with a principal place of business
22 at Via Dei Campigli 110, Verese, Italy.

23 45. Upon information and belief, Defendant Marathon Media Int. Ltd. is a
24 business entity organized under the laws of United Kingdom with a principal place
25 of business at 69 Twyford Abbey Road, London, UK.

26 46. Upon information and belief, Defendant Thomas Colley is an
27 individual residing in the United Kingdom.
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1 47. Upon information and belief, Defendant Vintage Music SL is a
2 business entity organized under the laws of Spain with a principal place of business
3 at c/ Lepanto 339-341 Local 4, Barcelona, Spain.

4 48. Upon information and belief, Defendant Acrobat Music Ltd. is a
5 business entity organized under the laws of United Kingdom with a principal place
6 of business at 42A Cannon Lane, Middlesex, UK.

7 49. Upon information and belief, Defendant Future Noise Music Limited is
8 a business entity organized under the laws of United Kingdom with a principal place
9 of business at Unit 1L, Clapham North Art Centre, London, UK.

10 50. Upon information and belief, Defendant Primephonic USA Inc. is a
11 corporation organized under the laws of Delaware with a principal place of business
12 at c/o Bailey Duquette P.C., 100 Broadway, 10th Floor, New York, NY.

13 51. Upon information and belief, Defendant Michael Bennett is an
14 individual residing in the United Kingdom.

15 52. Upon information and belief, Defendant AP Music Ltd is a business
16 entity organized under the laws of United Kingdom with a principal place of
17 business at Gable House, London, UK.

18 53. Upon information and belief, Defendant Hasmick Promotions Limited
19 is a business entity organized under the laws of United Kingdom with a principal
20 place of business at Unit 8 - Forest Hill Trading Estate, London, UK.

21 54. Upon information and belief, Defendant Henry Hadaway Organization
22 Limited is a business entity organized under the laws of United Kingdom with a
23 principal place of business at Hatton House - Church Lane, Hertfordshire, UK.

24 55. Upon information and belief, Defendant Entertain Me Ltd. is a business
25 entity organized under the laws of United Kingdom with a principal place of
26 business in London, UK.

1 56. Upon information and belief, Defendant OVC Media is a business
2 entity organized under the laws of United Kingdom with a principal place of
3 business at 34 Salisbury Street, London, UK.

4 57. Upon information and belief, Defendant Avid Group is a business
5 entity organized under the laws of United Kingdom with a principal place of
6 business at 15 Metro Centre Dwight Road, Watford, Hertsfordshire, UK.

7 58. Upon information and belief, Defendant Xelon Entertainment Pty. Ltd.
8 is a business entity organized under the laws of Australia with a principal place of
9 business at 294A Bridge Road, Richmond, VIC, Australia.

10 59. Upon information and belief, Defendant Lionfish Music, LLC is a
11 limited liability company organized under the laws of New York with a principal
12 place of business at 809 Union Street - Apt 4, Brooklyn, NY.

13 60. Upon information and belief, Defendant Smith & Co B.V. is a business
14 entity organized under the laws of Netherlands with a principal place of business at
15 PO Box 608, 1620 AR, Hoorn, Netherlands.

16 61. Upon information and belief, Defendant Brisa Records is a business
17 entity organized under the laws of Spain with a principal place of business at Calle
18 Llobregat (Pol Ind. El Pla), 8 - Nav 5, 8750, Molins De Rei, Barcelona, Spain.

19 62. Upon information and belief, Defendant ROBA Music Verlag GmbH is
20 a business entity organized under the laws of Germany with a principal place of
21 business at Neue Rabenstrasse 3, Hamburg, Germany.

22 63. Upon information and belief, Defendant Digital Gramophone is a
23 business entity organized under the laws of United Kingdom with a principal place
24 of business at 22a St Gabriels Road, London, UK.

25 64. Upon information and belief, Defendant Plaza Mayor Company
26 Limited is a business entity organized under the laws of United Kingdom with a
27 principal place of business at Lower Ground Floor, One George Yard, London, UK.
28

65. Upon information and belief, Defendant Blaricum C.D. Company (B.C.D.) BV is a business entity organized under the laws of Netherlands with a principal place of business at Dalkruidbaan 109, Capelle Aan Den Ijssel, Netherlands.

66. Upon information and belief, Defendants Wnts, Ideal Music, Best Records, Werner Last's Favourites Jazz, Broken Audio, Reloaded Music, Pink Dot, DWK Records, SendDigital, CTS Digital, Jazzsential, Mach60 Music, Impressions, Gralin Music, Jazz Co., Move, Cherished Records, Railroad, Vintage Records, Plenty Jazz Records, Jazz Moon, Favorite Classics, Historical Jazz, Rarity Music, Triton, Classics, and Bacci Bros Records, are trade names for business entities and/or persons whose identities and locations are unknown to plaintiffs but known to the Online and/or Distributor Defendants.

Jurisdiction and Venue

67. The Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. § 1338(a) because this is an action arising under the Copyright Act of 1976, 17 U.S.C. §§ 101, 106, 115, 501, 602 *et seq.*

68. This Court has personal jurisdiction over Defendants because they do systematic and continuous business and/or have a place of business in this Judicial District. Further, Plaintiffs' copyright infringement claims arise out of the reproduction and distribution of pirated recordings of the Subject Compositions listed in Exhibit B, occurring in California, by the Pirate Label, Distributor and/or Online Defendants. The Pirate Label Defendants expressly aimed their infringing conduct at this jurisdiction by specifically selecting which Distributor and Online Defendant would distribute its pirated recordings of the Subject Compositions to for further reproduction, distribution, sales and streams, and directly engaging in and/or authorizing such infringing activity in California. The Distributor Defendants expressly aimed their infringing conduct at this jurisdiction by specifically selecting

California Pirate Label Defendants' recordings to aggregate and distribute, and/or which Online Defendant it would distribute its pirated recordings of the Subject Compositions to for further reproduction, distribution, sales and streams, and directly engaging in and/or authorizing such infringing activity in California. The Online Defendants expressly aimed their infringing conduct at this jurisdiction by selecting the pirated recordings of the California Pirate Labels and/or California Distributor Defendants to unlawfully reproduce and distribute in California and directly engaging in such activity.

69. Venue is proper in this District pursuant to 28 U.S.C §§ 1391(b), 1391(c) and 1400(a) because Defendants are subject to personal jurisdiction in this Judicial District and have committed unlawful acts of infringement in this Judicial District. In addition, several Defendants have places of business in this Judicial District.

Harold Arlen

70. Harold Arlen (1905–1986) was a master composer and a highly regarded contributor to the Great American Songbook. The son of a synagogue cantor, Arlen was born in Buffalo, New York and emerged as one of the greatest American composers and songwriters, writing extraordinarily complex melodies and harmonies that remained accessible to a broad popular audience.

71. Early in his career, Arlen wrote songs for musicals, including the entire scores for Broadway shows such as Cotton Club Parade, Life Begins at 8:40, Bloomer Girl, St. Louis Woman, Jamaica and Saratoga, among others.

72. Arlen was also active in Hollywood and composed the music for some of the greatest film musicals of all time, most notably all the music in the 1939 motion picture classic “The Wizard of Oz,” including *Ding, Dong! The Witch Is Dead, We're Off To See The Wizard*, and *Over The Rainbow*.

1 73. *Over The Rainbow*, performed by Judy Garland in the film, won the
2 Academy Award for Best Original Song. The song is one of the most enduring
3 standards of the 20th century and was voted number one on the "Songs of the
4 Century" list compiled by the Recording Industry Association of America and the
5 National Endowment for the Arts. The American Film Institute also ranked *Over*
6 *The Rainbow* the greatest movie song of all time.

7 74. Arlen successfully collaborated with the greatest of the Tin Pan Alley
8 lyricists, including E.Y. "Yip" Harburg, Ira Gershwin, Johnny Mercer, Leo Robin
9 and Ted Koehler.

10 75. Arlen's partnership with Harburg extended over many decades. With
11 Billy Rose, they wrote *It's Only A Paper Moon* in 1933. They followed up with a
12 successful revue, *Life Begins at 8:40*, which included lyric collaborations with his
13 old friend, Ira Gershwin, including *Fun to Be Fooled*, *You're A Builder Upper*, and
14 *Let's Take A Walk Around The Block*.

15 76. Arlen was inducted into the Songwriters Hall of Fame in 1971 and was
16 honored with its highest accolade, the Johnny Mercer Award, in 1982.

17 77. In 1996, Arlen was honored and memorialized by the United States
18 Postal Service with his own stamp:



1 **Plaintiffs**

2 78. Harold Arlen's son, Sam Arlen, acquired the U.S. copyrights in the
3 Subject Compositions between 1989 and 2013, by termination notices that he, as
4 sole statutory heir under Section 304 of the Copyright Act of 1976, served and filed
5 with Copyright Office.

6 79. In 2018, Sam Arlen assigned the U.S. copyrights in the Subject
7 Compositions, as set forth in the Composition Chart annexed as Exhibit A, along
8 with all accrued causes of action, to his company, SA Music, LLC. SA Music, LLC
9 is the legal and/or beneficial owner of all the Subject Compositions identified in
10 Exhibit A, along with all accrued causes of action.

11 80. Plaintiff Harold Arlen Trust acquired the U.S. copyrights identified in
12 the Composition Chart annexed as Exhibit A by operation of will and through
13 termination notices served and filed by Harold Arlen during his lifetime with the
14 U.S. Copyright Office under Section 304 of the Copyright Act of 1976.

15 81. Plaintiff Harold Arlen Trust is the legal owner of certain of the Subject
16 Compositions as identified in Exhibit A, along with all accrued causes of action.

17 **The Subject Compositions**

18 82. Plaintiffs are owners of the musical compositions listed in the
19 Composition Chart annexed as Exhibit A (collectively, the "Subject Compositions")
20 that are the subject of this action.

21 83. The copyrights for all the Subject Compositions have been registered
22 and renewed with the U.S. Copyright Office, and each Subject Composition is the
23 subject of a valid U.S. copyright. The Composition Chart annexed as Exhibit A
24 identifies the copyright registration numbers for each of the Subject Compositions.

25 84. Plaintiffs are the owners of a 50% copyright interest in each of the
26 Subject Compositions, except where a lesser percentage is indicated on Exhibit A.

85. As discussed more fully below, the Defendants have infringed, and are continuing to infringe, the copyright in each of the Subject Compositions by willfully reproducing and distributing them without a license.

Background

86. Defendants each fall into at least one of three categories of participants in the digital music business: (a) online digital music stores and streaming services (listed in paragraphs 132 through 148 below); (b) distributors; and (c) pirate record imprints/labels (identified in Exhibit C).

87. Before digital music distribution, recorded music was physically distributed through brick-and-mortar stores that were confined by the limitations of shelf space. Recording artists signed exclusive recording contracts with record labels in order to have their records pressed and distributed in national record stores.

88. It is hard to imagine that a person walking into Tower Records, off the street, with arms full of CDs and vinyl records and claiming to be the record label for Frank Sinatra, Louis Armstrong and Ella Fitzgerald, could succeed in having that store sell their copies directly next to the same albums released by legendary record labels, Capitol, RCA and Columbia, and at a lower price.

89. Yet, this exact practice occurs every day in the digital music business, where there is unlimited digital shelf space (for example, there are more than 40 million recordings in the iTunes store) and a complete willingness by the digital music stores and services to seek popular and iconic recordings from any source, legitimate or not, provided they participate in sharing the proceeds.

90. The iconic status of the pirated recordings of the Subject Compositions at issue in this case cannot be overstated. Any list of the most popular singers and musicians of any period between 1930 and 1970 would be replete with the artists who have recorded Arlen's works, some of them multiple times.

91. For example, Frank Sinatra recorded many of Arlen's works over the course of his celebrated career. In 1953, after a decline in popularity and record sales, Sinatra switched labels from Columbia to Capitol Records. One of his first recording sessions with his new label was with Capitol arranger and conductor Nelson Riddle.

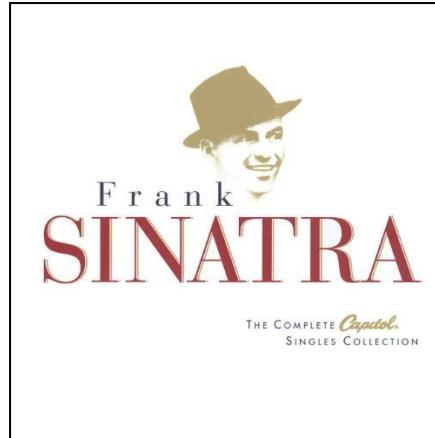
92. After recording, *I've Got The World On A String*, Sinatra told Riddle it was "Beautiful!", and could not hide his enthusiasm, exclaiming, "I'm back, baby, I'm back!" Capitol released *I've Got The World On A String* as a single in 1953:



93. Capitol re-issued the recording on the album *This Is Sinatra!* in 1956:



94. Capitol continues to sell the recording to this day, including as part of the album Frank Sinatra: The Complete Capitol Singles Collection:



95. While Capitol (now part of Universal Music Group) is the only entity that has the right to do so, it is not the only one reproducing and distributing the Sinatra 1953 recording of *I've Got The World On A String*. Defendants have also reproduced and distributed at least 29 pirated or “bootleg” copies of this recording of Plaintiffs’ composition under at least nine different imprints.

96. Similarly, Lena Horne recorded *Stormy Weather* for the movie of the same title which, in 2001, was selected for the US National Film Registry by the Library of Congress as being “culturally, historically, or aesthetically significant.” Horne first recorded *Stormy Weather* in 1942 and the track was released by RCA Victor as part of *Moanin’ Low – Torch Songs by Lena Horne*:



1 97. RCA continues to sell and stream this recording, including on The
2 Classic Lena Horne, released as part of its “RCA 100 Years of Music” series:



11 98. While RCA (now part of Sony) alone has the legal right to do so, it is
12 not the only one reproducing and distributing this historic recording. Defendants
13 have also reproduced and distributed over 100 “bootleg” copies of this recording
14 embodying the *Stormy Weather* composition under at least 25 different imprints.

15 99. As another example, the 1933 recording of *Stormy Weather* by Ethel
16 Waters originally released by Brunswick, is one of only 500 recordings selected by
17 the Librarian of Congress for inclusion in the National Recording Registry as
18 “culturally, historically or aesthetically important, and/or inform or reflect life in the
19 United States”:



1 100. Defendants have reproduced and distributed no less than 58 “bootleg”
2 copies of this recording of *Stormy Weather* under 16 different imprints.

3 101. The Sinatra, Horne and Waters recordings identified above have all
4 been inducted into the Grammy Hall of Fame established by the Recording
5 Industry’s National Trustees in 1973 to honor recordings of lasting qualitative or
6 historical significance.

7 102. Like the Sinatra, Horne, and Waters recordings, all the recordings on
8 the Infringement Chart (Exh. B) embodying the Subject Compositions are pirated
9 copies, or “bootlegs.” Defendants’ digital phonorecord deliveries of these pirated
10 copies were all made without authorization from the copyright owners of the sound
11 recordings or those who originally “fixed” them as required by Section 115
12 (discussed below), or the copyright owners of the Subject Compositions.

13 103. In many cases, the bootleggers have also appropriated the cover art
14 from the original release. For example, Amazon currently offers two copies of the
15 1964 Ethel Ennis recording of Harold Arlen’s classic, *For Every Man There’s A*
16 *Woman*: the legitimate RCA (Sony) release, selling for \$1.29 (depicted below, left,
17 with RCA logo circled) and a pirated copy released by pirate label Stardust Records,

with RCA's logo removed from the album cover art, selling for \$0.89 (depicted below, right):



RCA single: \$1.29



Stardust single: \$0.89

104. There are many other examples. The pirate label Pickwick Group Limited is selling John Towner Williams' 1958 recording of *I've Got the World On A String* under its Cool Note imprint on Amazon directly next to a legitimate copy sold by the actual label that produced the 1958 recording, Bethlehem Records. The only difference is that Pickwick has removed the Bethlehem logo from its cover art and sells its album for \$2.50 less:



Bethlehem album: \$9.49



Pickwick album: \$6.99

105. Pickwick likewise sold pirated copies of Benny Goodman's 1955 recording of *Get Happy* in the Google Play and Amazon stores alongside the

1 legitimate copy from Capitol Records. Again, the only significant difference
2 between the releases is that Pickwick removed Capitol's logo and lowered the price.



10 **Capitol album: \$7.99**

11 **Pickwick album: \$6.99**

12 106. Defendants all generate illicit revenue for themselves when these and
13 other pirated copies are sold or distributed. Plaintiffs have not authorized any
14 reproduction or distribution of these pirate recordings of the Subject Compositions
15 (or any identified on Exhibit B) and it is an infringement for which the Pirate Label,
16 Distributor and Online Defendants are jointly and severally liable.

17 **The Pirated Recordings**

18 107. The same deceit and manipulation are at work in all of the
19 infringements identified in Exhibit B. Defendants have taken recordings of the
20 Subject Compositions – in which they hold no rights – and reproduced and
21 distributed pirated copies of them to the public as downloads and interactive
22 streams.

23 108. Virtually all of the recordings at issue in this case were originally made
24 between 1930 and 1972. Because of the consolidation in the music industry, many
25 of the record labels that originally released these recordings have been acquired or
26 otherwise consolidated by the three remaining major labels, Sony, Universal, and
27 Warner, and their catalogs were absorbed into the major labels' "back catalog." This
28 consolidation occurred well before the first digital music stores started operating in
the early 2000s.

109. Since virtually none of the Pirate Label Defendants existed prior to the year 2005, let alone originally “fixed” any of the relevant recordings, the only way for them to acquire the rights to distribute them would be to purchase or license rights in these recordings.

110. There is, however, no record of any of the Pirate Label Defendants ever having acquired permission or the rights to reproduce or distribute any of these back catalog recordings from the major labels.

111. Upon information and belief, the Pirate Label Defendants are simply duplicating pre-existing recordings made by others without permission, and joining with the Distributor and Online Defendants to make digital phonorecord deliveries of the pirated copies of the recordings of the Subject Compositions in their stores and services.

The Pirate Label Defendants

112. The Pirate Label Defendants are individuals or companies that duplicate old vinyl records, or other pre-existing recordings, “phonorecords,” embodying the Subject Compositions, made by others, without permission. The Pirate Label Defendants then distribute these pirated digital recordings of the Subject Compositions to the Distributor Defendants, who make copies, and authorize the Distributor Defendants to make digital phonorecord deliveries in the Online Defendants’ stores and services.

113. The Pirate Label Defendants are modern-day descendants of “tape pirates.” As explained in *Heilman v. Levi*, 391 F.Supp. 1106 (E.D. Wisc 1975): “[Tape pirates] purchase records and tapes, manufactured by others, on the open market and then duplicate or copy the recordings on their own sound equipment and offered the duplicated recordings for sale to the general public at a price well below the retail price of the original recordings. A ‘tape pirate’ need only purchase a single legitimate sound recording and reproduce it. The ‘pirate’ bears none of the costs of

1 arranging and recording the music and because pirates copy only successful
2 recordings, they bear none of the risk of failure to which legitimate record
3 companies expose themselves in acquiring musical rights and marketing appeal.”

4 114. In some instances, the “skips,” “pops” and “crackles” of a well-worn
5 vinyl record unlawfully duplicated by the Pirate Label Defendants is captured in the
6 digital copies they distribute and sell through the Distributor Defendants and Online
7 Defendants.

8 115. For example, Cleopatra Records, Inc. (“Cleopatra”) is one of the largest
9 infringers in this case and is responsible for multiple pirate label imprints Burning
10 Fire, Classic Music International, Cleopatra, Goldenlane Records, Magic Gold
11 Records, Master Classics, Mocking Bird, Rolled Gold Classics, Screenland Records,
12 Soundtrack Classics, Stardust, Stereo Magic Records, and Vintage Masters.

13 Cleopatra is a California corporation started in 1992 with principal offices located at
14 11041 Santa Monica Blvd PMB #70, Los Angeles California 90025.

15 116. Upon information and belief, Cleopatra has been one of the Online
16 Defendants’ single largest record label sources of digital recordings for their U.S.
17 stores, at times having been the record label responsible for as much as 1% of the
18 entire catalogs of iTunes and its competitors, with hundreds of thousands of
19 recordings, outpacing even the major record labels.

20 117. In some cases, the Pirate Label Defendant is an individual. For
21 example, Thomas Colley is an individual residing in the United Kingdom
22 responsible for the following pirate label imprints: Magnitude Records, Sixth Right
23 Records, Seventh Right Records, Eighth Right Records, Ninth Right Records and
24 Tenth Right Records.

25 118. The Pirate Label Defendants are identified in the Pirate Label Chart
26 annexed as Exhibit C which sets forth the assumed or “imprint” name used by the
27
28

1 Pirate Label Defendants in the Online Defendants' stores and services to sell and
2 stream the pirated digital recordings of the Subject Compositions.

3 119. Upon information and belief, each Pirate Label Defendant is a person
4 or a corporation or other business entity formed and operating under the laws of the
5 corresponding country listed in Exhibit C. To the extent Plaintiffs have been able to
6 identify the Pirate Label Defendant responsible for a particular imprint, the
7 information is provided in the Pirate Label Chart. To the extent possible, the Pirate
8 Label Chart identifies the parent entity or person that operates under the names of
9 the pirate label imprints at issue in this case and sets forth the business address for
10 the parent entity, including its home country.

11 120. The Pirate Label Defendants have made pirated copies of recordings
12 embodying the Subject Compositions, and distributed them to the Distributor and
13 Online Defendants, and authorized their making of digital phonorecord deliveries, as
14 specifically set forth in the Infringement Chart annexed as Exhibit B.

15 121. In addition to the named Pirate Label Defendants, there are additional
16 persons and/or labels ("John Doe Pirate Label Defendants") whose identities are not
17 yet known who have reproduced and distributed the digital recordings embodying
18 the Subject Compositions to the Retailer and Distributor Defendants. The identities
19 of the John Doe Pirate Labels are known to the Distributor Defendants because they
20 have contracts with, and make payments to, the John Doe Pirate Labels when the
21 digital recordings they supply are sold or streamed.

22 122. Similarly, the Online Defendants know the identity of the distributor
23 for each of the John Doe Pirate Labels because they pay royalties to the distributor
24 of the John Doe Pirate Label each time its pirated recording is sold or streamed.

The Distributor Defendants

123. The Distributor Defendants engage in the worldwide distribution of digital music through digital music stores and music streaming services, including the Online Defendants' stores and services.

124. The Distributor Defendants are specifically selected and contracted by the Online Defendants (and other digital music stores and services) to provide their digital music catalogs to be sold and streamed in their respective stores and services on negotiated financial terms.

125. The Distributor Defendants collect and aggregate recordings to distribute from the Pirate Label Defendants. The Distributor Defendants reproduce the recordings, digitally encode the recordings into multiple formats for distribution to and by digital music stores and streaming services, including those operated by the Online Defendants, and receive a share of the revenue when the recordings they distribute are sold or streamed.

126. The Distributor Defendants have unlawfully reproduced the pirated copies of the recordings of the Subject Compositions and distributed them to the Online Defendants, and authorized their making of digital phonorecord deliveries, as specifically set forth in the Infringement Chart annexed as Exhibit B.

127. In many cases, however, Plaintiffs have not yet identified the party responsible for distributing the pirated copies of the recordings embodying the Subject Compositions. The Online Defendants know who supplied them with these pirated copies of the recordings of the Subject Compositions because they pay royalties to these distributors when their pirated copies are sold or streamed.

128. To the extent Plaintiffs have identified the distributor of a recording, the information is provided in the Infringement Chart annexed as Exhibit B.

129. In addition to the named Distributor Defendants, there are a number of distributors ("John Doe Distributor Defendants") whose identity is unknown to

1 Plaintiffs, who have reproduced and distributed the pirated copies of the recordings
2 embodying the Subject Compositions to the Online Defendants.

3 130. The identities of these John Doe Distributors are known to the Pirate
4 Label and Online Defendants. The Pirate Label Defendants have contracts with the
5 John Doe Distributor Defendants, receive payments from the John Doe Distributor
6 Defendants when the pirated copies of recordings they supply are sold or streamed,
7 and use the John Doe Distributor Defendants' software and/or website to manage
8 their catalogs of pirated recordings available in the Online Defendants' stores and
9 services and to track sales and streams.

10 131. Similarly, the Online Defendants have selected the John Doe
11 Distributor Defendants for inclusion of their catalogs in their stores and streaming
12 services, negotiated contracts with them, accepted their digital music for
13 distribution, and made payments to the John Doe Distributor Defendants based on
14 the number of times they make digital phonorecord deliveries of the pirated
15 recordings.

16 **The Online Defendants**

17 132. Apple, Amazon, Google, Microsoft and Pandora (collectively, the
18 "Online Defendants") own and operate some of the largest digital music stores and
19 streaming services in the world. The Online Defendants profit from selling and/or
20 streaming digital musical recordings. The Online Defendants limit the recordings in
21 their online stores and streaming services to those distributed by distributors they
22 have selected and with whom they have negotiated contracts.

23 133. The more recordings and albums the Online Defendants make available
24 in their stores and services, the better they are able to attract buyers and subscribers.
25 Throughout their short stints in the music business, the Online Defendants have
26 frequently advertised the number of recordings available in their stores and services
27 to attract additional streaming subscribers and download purchasers.
28

134. The Online Defendants reproduce and distribute pirated copies of recordings of the Subject Compositions they receive from the Pirate Label and Distributor Defendants, including as downloads and interactive streams, among other types of digital phonorecord deliveries.

Apple

135. Apple owns and operates the U.S. iTunes Store (“iTunes”), a digital music store. iTunes opened in April 2003 and has been the largest music vendor in the United States since April 2008 and the largest music vendor in the world since February 2010. As of January 2017, the iTunes Store offered between 35–40 million recordings for download.

136. Apple also owns and operates Apple Music, a subscription music-streaming service that enables users to select music from the iTunes catalog to stream to various devices on-demand. The Apple Music streaming service also offers subscribers the ability to download copies of the tracks that are available for streaming. In May 2018, Apple Music reportedly had over 50 million subscribers.

Amazon

137. Amazon owns and operates Amazon Music, a software-based digital media store. Amazon launched the service originally as “Amazon MP3” in September 2007. Amazon currently offers a catalog of over 40 million tracks for sale as digital downloads.

138. In addition to digital purchases, Amazon Music also serves streaming music through Prime Music and Music Unlimited. Amazon Prime has over 100 million subscribers and offers access to a streaming catalog of over 2 million tracks. Amazon Unlimited is a full-catalog streaming service that has been available as subscription since late 2016 and currently has tens of millions of subscribers, all of whom have access to stream the entire Amazon MP3 catalog on a subscription basis

1 for monthly fees ranging from \$3.99 to \$14.99, depending on the number of devices,
2 users, and whether the subscriber is an Amazon Prime member.

3 ***Google***

4 139. Google has owned and operated various digital music stores and
5 streaming services since 2011, including Google Music, Google Play, and,
6 currently, Google Play Music.

7 140. Google Play Music is a digital music store that currently has a catalog
8 of over 40 million tracks for sale. Google offers subscription music-streaming
9 services that enable users to select music from the Google Play catalog to stream to
10 various devices on-demand. The Google Play Music streaming service also offers
11 subscribers the ability to purchase download copies of the tracks that are available
12 for streaming. Google has over 7 million streaming music subscribers.

13 ***Microsoft***

14 141. Microsoft has owned and operated several digital music services,
15 including Zune, Xbox Music, and Groove Music, a subscription music-streaming
16 service that enables users to select music from the Microsoft catalog to stream to
17 various devices on-demand.

18 142. Microsoft's digital music stores offered a catalog of over 18 million
19 tracks for sale as individual digital downloads. Groove Music subscribers had access
20 to stream the Microsoft catalog on a subscription basis. Before it ceased operation
21 on December 31, 2017, the Groove streaming service also offered subscribers the
22 ability to download copies of the tracks that were available for streaming.

23 ***Pandora***

24 143. Pandora has owned and operated several music streaming services,
25 including Pandora Premium, a subscription music-streaming service that enables
26 users to select music from the Pandora catalog to stream to various devices on-
27 demand.

1 144. The Pandora Premium streaming service also offers subscribers the
2 ability to download copies of the tracks that are available for streaming. Pandora
3 Premium currently has over 4 million subscribers who all have access to the
4 Pandora catalog of over 30 million tracks on a paid subscription basis.

5 145. iTunes, Apple Music, Amazon MP3, Amazon Music Unlimited,
6 Amazon Prime Music, Google Music, Google Play, Google Play Music, Zune,
7 Xbox, Groove Music and Pandora Premium are collectively referred to herein as the
8 Online Defendants' "stores and services."

9 146. The Infringement Chart at Exhibit B sets forth each pirated recording of
10 the Subject Compositions identified thus far by Plaintiffs that the Online Defendants
11 have reproduced and made available for digital phonorecord deliveries in their
12 stores and services without authorization and the specific type of reproduction,
13 distribution, and/or digital phonorecord delivery made ("Method").

14 147. The Online Defendants have the right and ability to supervise or control
15 the reproduction and distribution of pirated copies of recordings of the Subject
16 Compositions in their stores and services and receive a direct financial interest from
17 this activity.

18 148. Upon information and belief, there are additional online music stores
19 and streaming services that are distributing pirated recordings of the Subject
20 Compositions without authorization, identified here as John Doe Defendants. The
21 Pirate Label and Distributor Defendants have knowledge of the identities of these
22 John Doe Defendants.

23 **Defendants Have Infringed the Subject Compositions**

24 149. Section 115 of the Copyright Act expressly excludes Defendants'
25 activity of making digital phonorecord deliveries of pirated recordings of the
26 Subject Compositions as an activity that is eligible for a compulsory license and
27
28

1 Defendants have failed to obtain any licenses for the Subject Compositions that
2 authorize such activity.

3 150. Upon information and belief, some Defendants may have attempted to
4 obtain licenses to make digital phonorecord deliveries of the pirated recordings of
5 the Subject Compositions identified on the Infringement Chart from the Harry Fox
6 Agency (“Harry Fox” or “HFA”).

7 151. Harry Fox licenses, however, adopt the terms of Section 115 and are
8 therefore not available for pirated recordings.

9 152. In addition, upon information and belief, some Online Defendants may
10 have engaged third party services such as Music Reports, Inc., and RightsFlow to
11 obtain compulsory licenses for digital phonorecord deliveries the Online Defendants
12 make, however, the activity of making digital phonorecord deliveries of pirated
13 recordings of the Subject Compositions is not eligible for a compulsory license so
14 any such attempt is ineffective.

15 **Unauthorized Digital Phonorecord Deliveries**

16 153. The various unauthorized types of unauthorized reproductions,
17 distributions, and/or digital phonorecord delivery configurations of pirated
18 recordings of the Subject Compositions by Defendants (the “Methods” in Exhibit B)
19 are discussed briefly below.

20 ***Permanent Downloads***

21 154. Permanent download means a digital transmission of a sound recording
22 of a musical work in the form of a download, where such sound recording is
23 accessible for listening without restriction as to the amount of time or number of
24 times it may be accessed.

25 155. All the Online Defendants except for Pandora have sold permanent
26 downloads of the pirated recordings of the Subject Compositions to their customers
27 (“PD” on the Infringement Chart).

1 156. Permanent downloads of pirated recordings of the Subject
2 Compositions require licenses from the copyright owners of the Subject
3 Compositions and Defendants all failed to obtain such licenses for each entry on the
4 Infringement Chart.

5 157. The Defendants' respective permanent downloads of pirated recordings
6 of the Subject Compositions infringe Plaintiffs' exclusive reproduction and
7 distribution rights under 17 U.S.C. § 106(1) and (3).

8 ***Limited Downloads***

9 158. Limited Download means a digital transmission of a sound recording of
10 a musical work in the form of a download, where such sound recording is accessible
11 for listening only a limited amount of time or specified number of times.

12 159. All of the Online Defendants made or make available limited
13 downloads of pirated recordings of the Subject Compositions to their customers
14 ("LD on the Infringement Chart").

15 160. Limited downloads of pirated recordings of the Subject Compositions
16 require licenses from the copyright owners of the Subject Compositions and
17 Defendants all failed to obtain such licenses for each entry on the Infringement
18 Chart.

19 161. The Defendants' respective limited downloads of pirated recordings of
20 the Subject Compositions infringe Plaintiffs' exclusive reproduction and distribution
21 rights under 17 U.S.C. § 106(1) and (3).

22 ***Interactive Streams***

23 162. Interactive stream means a digital transmission of a sound recording of
24 a musical work in the form of a stream, where the performance of the sound
25 recording by means of such transmission is not exempt under 17 U.S.C. § 114(d)(1)
26 and does not in itself, or as a result of a program in which it is included, qualify for
27 statutory licensing under Section 114(d)(2).

163. The Online Defendants all make or made available interactive streams of pirated recordings of the Subject Compositions to their customers (“ST” on the Infringement Chart).

164. Interactive streams of pirated recordings of the Subject Compositions require licenses from the copyright owners of the Subject Compositions and Defendants all failed to obtain such licenses for each entry on the Infringement Chart.

165. The Defendants' respective interactive streams of pirated recordings of the Subject Compositions infringe Plaintiffs' exclusive reproduction and distribution rights under 17 U.S.C. § 106(1) and (3).

Promotional Clips

166. The Online Defendants (except for Pandora) all have a feature in their online music stores that allow users to interactive stream a sample, promotional clip, of the recordings that are available for sale as permanent downloads.

167. Promotional clips (“PC” on the Infringement Chart) are 30–90 seconds long and their purpose is to encourage the purchase of the tracks as permanent downloads.

168. Promotional clips of pirated recordings of the Subject Compositions are interactive streams that require a license from the copyright owners of the Subject Compositions and Defendants all failed to obtain such licenses for each entry on the Infringement Chart.

169. The Defendants' respective promotional clips of pirated recordings of the Subject Compositions infringe Plaintiffs' exclusive reproduction and distribution rights under 17 U.S.C. § 106(1) and (3).

Scan and Match

170. Apple, Amazon, and Google have offered scan and match services such as iTunes Match, Amazon Scan and Match, Google Scan and Match on a

1 subscription basis (“SM” on the Infringement Chart). For a fee, these scan and
2 match services scan the customer’s hard drive for music files contained thereon and
3 compare the user’s music files with those stored on the Online Defendant’s cloud
4 service.

5 171. When a match is made, the Online Defendant makes a digital
6 phonorecord delivery of the cloud server copy to the customer. The scan and match
7 service requires a mechanical license.

8 172. Scan and match of pirated recordings of Subject Compositions are
9 digital phonorecord deliveries that require a license from the copyright owners of
10 the Subject Compositions and all of the Defendants failed to obtain such licenses for
11 each entry on the Infringement Chart.

12 173. The Defendants’ respective scan and match digital phonorecord
13 deliveries of pirated recordings of the Subject Compositions infringe Plaintiffs’
14 exclusive reproduction and distribution rights under 17 U.S.C. § 106(1) and (3).

15 ***Server Copies***

16 174. Defendants have all reproduced the pirated recordings of the Subject
17 Compositions identified in the Infringement Chart annexed as Exhibit B on their
18 respective servers as server copies (“SC” on the Infringement Chart), including the
19 server copies of the Online Defendants’ stores and services.

20 175. Server copies of pirated recordings of the Subject Compositions are
21 reproductions that require a license from the copyright owners of the Subject
22 Compositions and all Defendants failed to obtain such licenses for each entry on the
23 Infringement Chart.

24 176. The Defendants’ respective server copies of pirated recordings of the
25 Subject Compositions infringe Plaintiffs’ exclusive reproduction and distribution
26 rights under 17 U.S.C. § 106(1) and (3).

Making Available

177. Defendants have made and (except for Microsoft) continue to make the pirated recordings of the Subject Compositions available to the public for digital phonorecord deliveries as reflected on the Infringement Chart annexed as Exhibit B by uploading and/or offering pirated recordings of the Subject Compositions in the Online Defendants' stores and streaming services or authorizing the same.

178. The Defendants' making available ("MA" on the Infringement Chart) pirated recordings of the Subject Compositions requires a license from the copyright owners of the Subject Compositions and Defendants all failed to obtain such licenses for each entry on the Infringement Chart and Defendants have infringed Plaintiffs' exclusive distribution rights under 17 U.S.C. § 106 as a "deemed distribution." *A&M Records v. Napster*, 239 F.3d 1004, 1014 (9th Cir. 2001); *Perfect 10, Inc. v. Amazon.com, Inc.*, 487 F.3d 701 718–19 (9th Cir. 2007).

Importation

179. Importation of phonorecords of a musical composition acquired outside the U.S. requires authorization of the owner of the copyright of the musical composition under Section 602 of the Copyright Act. Importation without the authority of the owner of the copyright in that composition is an infringement of the exclusive distribution rights under 17 U.S.C. § 106(3).

180. The Online, Distributor and foreign Pirate Label Defendants have all engaged in the unauthorized importation ("IM" on the Infringement Chart) of phonorecords of the Subject Compositions, acquired outside the U.S., by digital phonorecord delivery, or other delivery of phonorecords.

181. The Pirate Label Chart and Distributor Charts annexed as Exhibits C and D set forth the country in which each of the Pirate Labels and Distributors is based and doing business.

1 182. Many of the Pirate Label Defendants are located in foreign countries.
2 These foreign Pirate Label Defendants, together with the Distributor Defendants and
3 Online Defendants, have engaged in the importation of phonorecords embodying
4 pirated recordings of the Subject Compositions into the United States by digital
5 phonorecord delivery, or other delivery of phonorecords.

6 183. None of the Defendants distributing the foreign Pirate Label
7 Defendants' recordings of the Subject Compositions identified in the Infringement
8 Chart annexed as Exhibit B obtained importation authorization from the copyright
9 owners of the Subject Compositions.

10 184. The Defendants' respective importations of pirated recordings of the
11 Subject Compositions infringe Plaintiffs' exclusive importation rights under 17
12 U.S.C. § 602 and distribution rights under 17 U.S.C. § 106(3).

13 *Exportation*

14 185. Exportation of phonorecords, the making of which constituted an
15 infringement of copyright, requires authorization of the copyright owner under
16 Section 602 of the Copyright Act.

17 186. Upon information and belief, Cleopatra, Amazon, Apple, Google, and
18 unidentified Distributor Defendants have engaged in the unauthorized exportation
19 ("EX" on the Infringement Chart) of phonorecords of pirated recordings of the
20 Subject Compositions as identified on the Infringement Chart at Exhibit B by digital
21 phonorecord delivery to the Amazon and Apple's online store in the United
22 Kingdom (identified as "Amazon (UK)" and "iTunes (UK)" on the Infringement
23 Chart) without authorization for exportation from Plaintiffs and the co-owners of the
24 Subject Compositions.

25 187. The Defendants' respective exportation of pirated recordings of the
26 Subject Compositions constitutes infringement of Plaintiffs' exclusive rights of
27 exportation under 17 U.S.C. § 602.

1 ***Illegal Downloading Prior to Exportation***

2 188. Defendants Cleopatra, Amazon, Apple, Google, and the unidentified
3 John Doe Distributor Defendants, are engaged in a systematic process of illegally
4 downloading pirated copies of recordings of the Subject Compositions in the U.S.
5 prior to distributing or exportation of these works to the U.K. (also “EX” on the
6 Infringement Chart). Many of the pirated recordings of the Subject Compositions
7 made by Cleopatra are exclusively made available for downloads and streams in
8 Amazon’s, Google’s, and Apple’s foreign digital music stores and services.

9 189. Cleopatra, the John Doe Distributors, Amazon, Google, and Apple
10 have each reproduced server copies of the pirated recordings of the Subject
11 Compositions in the U.S. without any authority whatsoever to make these
12 reproductions, the identical activity for which Ms. Thomas-Rassett and Mr.
13 Tenenbaum were liable (see paragraphs 10–12 above).

14 190. Any reproduction of the Subject Compositions in the United States
15 without a license from the copyright owners is an infringement of the copyright
16 owners’ rights under 17 U.S.C. § 106(1) (“the owner of the copyright has the
17 exclusive right to . . . reproduce the copyrighted work in copies or phonorecords.”).
18 Whatever foreign copyright laws may say, the U.S. Copyright Act governs
19 reproductions in the U.S. and distributions or exportation from the U.S.

20 191. Defendants’ respective unauthorized downloading of pirated recordings
21 embodying the Subject Compositions prior to exportation constitutes infringement
22 of Plaintiffs’ exclusive rights under 17 U.S.C. § 106(1).

23 **Willfulness**

24 192. The infringing conduct of all of the Defendants is willful. The Pirate
25 Labels know that they do not have authorization for reproduction, distribution,
26 importation and exportation of the Subject Compositions on pirated recordings.

1 193. Similarly, the Distributor Defendants do not perform any investigation
2 or due diligence to confirm that the Pirate Labels have any authorization to make, or
3 authorize the making of digital phonorecord deliveries, or the importation and
4 exportation, of pirated recordings of the Subject Compositions. Several of the
5 Distributor Defendants have had knowledge of the infringing conduct of many of
6 the Pirate Label Defendants for several years and have continued to make digital
7 phonorecord deliveries of the pirated recordings they provide without any licenses
8 for the musical compositions, and/or were recklessly indifferent or willfully blind to
9 their own infringing conduct.

10 194. Finally, the Online Defendants have had knowledge of their own
11 infringing conduct and that of many of the Pirate Label and Distributor Defendants
12 for several years and have continued to work with them and make digital
13 phonorecord deliveries and other reproductions and distributions of the pirated
14 recordings the Pirate Labels and Distributor Defendants provide their stores and
15 streaming services, and/or were recklessly indifferent or willfully blind to their own
16 infringing conduct.

17 195. In addition to the recordings identified in the Infringement Charts
18 identified below, there are believed to be many other pirated recordings of the
19 Subject Compositions that Defendants have reproduced and distributed without
20 authorization, including by making digital phonorecord deliveries in the Online
21 Defendants' stores and services that Plaintiffs have not yet identified or that are no
22 longer available.

23 196. The infringement by Defendants of each Subject Composition on each
24 pirated recording identified in the Infringement Charts at Exhibits B1–B217 began
25 as of the date of upload, receipt, and/or reproduction by the Online Defendants of
26 server copies of the pirated recordings designated for reproduction and distribution
27 by the Pirate Label and Distributor Defendants and continues to the present (except
28

1 for Microsoft which ceased to do so on December 31, 2017). The infringements
 2 identified in Exhibits B1–B217 all occurred and were first discovered by the
 3 respective Plaintiffs within three years of filing this Complaint.

4 197. By their conduct described above, defendants have infringed and are
 5 continuing to infringe Plaintiffs' copyrights on a regular basis in violation of 17
 6 U.S.C. §§ 101, 106, 115, 501, 602 *et seq.*

7 198. As a direct and proximate result of Defendants' infringement, Plaintiffs
 8 are entitled to statutory damages under 17 U.S.C. § 504(c).

9 199. Defendants' infringement is and has been willful, intentional,
 10 purposeful and with willful disregard of the rights of Plaintiffs. Anything less than
 11 maximum statutory damage awards would encourage infringement, amount to a slap
 12 on the wrist, and reward multibillion and trillion dollar companies that rule the
 13 digital music markets for their willful infringement on a grand scale.

14 200. Plaintiffs are also entitled to their costs, including reasonable attorneys'
 15 fees, pursuant to 17 U.S.C. § 505.

16 201. Unless enjoined by this Court, Defendants will continue to cause
 17 Plaintiffs irreparable injury that cannot be fully compensated or measured in money.
 18 Plaintiffs have no adequate remedy at law. Pursuant to 17 U.S.C. § 502, Plaintiffs
 19 are entitled to a permanent injunction prohibiting Defendants from reproducing,
 20 distributing, streaming, and selling the pirated recordings of the Subject
 21 Compositions without license or authorization in violation of the Copyright Act.

22 **First Claim – Copyright Infringement**
 23 **Against Cleopatra Records, Inc., "John Doe" Distributor, and Amazon**

24 153. Plaintiffs repeat each and every allegation of the Complaint.

25 154. As a separate specific course of infringement, Defendants Cleopatra
 26 Records, Inc., "John Doe" Distributor, and Amazon have unlawfully reproduced and
 27 distributed unauthorized recordings of Plaintiffs' Subject Compositions including,
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1 but not limited to, the recordings identified in Exhibit B-1. Exhibit B-1 sets forth a
2 non-exhaustive list of specific pirated recordings embodying Subject Compositions
3 that have been reproduced and distributed by Defendants Cleopatra Records, Inc.,
4 "John Doe" Distributor, and Amazon without authorization. These Defendants have
5 willfully infringed, and are continuing to infringe, Plaintiffs' copyrights in the
6 Subject Compositions by the methods identified in Exhibit B-1 (or have authorized
7 such activity) without obtaining authorization to do so.

8
9 **Second Claim – Copyright Infringement
Against Pickwick Group Limited, Orchard, and Amazon**

10 155. Plaintiffs repeat each and every allegation of the Complaint.

11 156. As a separate specific course of infringement, Defendants Pickwick
12 Group Limited, Orchard, and Amazon have unlawfully reproduced and distributed
13 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
14 limited to, the recordings identified in Exhibit B-2. Exhibit B-2 sets forth a non-
15 exhaustive list of specific pirated recordings embodying Subject Compositions that
16 have been reproduced and distributed by Defendants Pickwick Group Limited,
17 Orchard, and Amazon without authorization. These Defendants have willfully
18 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
19 Compositions by the methods identified in Exhibit B-2 (or have authorized such
20 activity) without obtaining authorization to do so.

21
22 **Third Claim – Copyright Infringement
Against Cleopatra Records, Inc., Orchard, and Amazon**

23 157. Plaintiffs repeat each and every allegation of the Complaint.

24 158. As a separate specific course of infringement, Defendants Cleopatra
25 Records, Inc., Orchard, and Amazon have unlawfully reproduced and distributed
26 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
27 limited to, the recordings identified in Exhibit B-3. Exhibit B-3 sets forth a non-
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1 exhaustive list of specific pirated recordings embodying Subject Compositions that
 2 have been reproduced and distributed by Defendants Cleopatra Records, Inc.,
 3 Orchard, and Amazon without authorization. These Defendants have willfully
 4 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
 5 Compositions by the methods identified in Exhibit B-3 (or have authorized such
 6 activity) without obtaining authorization to do so.

7 **Fourth Claim – Copyright Infringement**
 8 **Against Wnts, Believe Digital, and Amazon**

9 159. Plaintiffs repeat each and every allegation of the Complaint.

10 160. As a separate specific course of infringement, Defendants Wnts,
 11 Believe Digital, and Amazon have unlawfully reproduced and distributed
 12 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
 13 limited to, the recordings identified in Exhibit B-4. Exhibit B-4 sets forth a non-
 14 exhaustive list of specific pirated recordings embodying Subject Compositions that
 15 have been reproduced and distributed by Defendants Wnts, Believe Digital, and
 16 Amazon without authorization. These Defendants have willfully infringed, and are
 17 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
 18 methods identified in Exhibit B-4 (or have authorized such activity) without
 19 obtaining authorization to do so.

20 **Fifth Claim – Copyright Infringement**
 21 **Against Ideal Music, Ingrooves, and Amazon**

22 161. Plaintiffs repeat each and every allegation of the Complaint.

23 162. As a separate specific course of infringement, Defendants Ideal Music,
 24 Ingrooves, and Amazon have unlawfully reproduced and distributed unauthorized
 25 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
 26 recordings identified in Exhibit B-5. Exhibit B-5 sets forth a non-exhaustive list of
 27 specific pirated recordings embodying Subject Compositions that have been
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1 reproduced and distributed by Defendants Ideal Music, Ingrooves, and Amazon
2 without authorization. These Defendants have willfully infringed, and are
3 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
4 methods identified in Exhibit B-5 (or have authorized such activity) without
5 obtaining authorization to do so.

6 **Sixth Claim – Copyright Infringement**
7 **Against Cugate Ltd., Believe Digital, and Amazon**

8 163. Plaintiffs repeat each and every allegation of the Complaint.

9 164. As a separate specific course of infringement, Defendants Cugate Ltd.,
10 Believe Digital, and Amazon have unlawfully reproduced and distributed
11 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
12 limited to, the recordings identified in Exhibit B-6. Exhibit B-6 sets forth a non-
13 exhaustive list of specific pirated recordings embodying Subject Compositions that
14 have been reproduced and distributed by Defendants Cugate Ltd., Believe Digital,
15 and Amazon without authorization. These Defendants have willfully infringed, and
16 are continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
17 methods identified in Exhibit B-6 (or have authorized such activity) without
18 obtaining authorization to do so.

19 **Seventh Claim – Copyright Infringement**
20 **Against Blue Sounds, Orchard, and Amazon**

21 165. Plaintiffs repeat each and every allegation of the Complaint.

22 166. As a separate specific course of infringement, Defendants Blue Sounds,
23 Orchard, and Amazon have unlawfully reproduced and distributed unauthorized
24 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
25 recordings identified in Exhibit B-7. Exhibit B-7 sets forth a non-exhaustive list of
26 specific pirated recordings embodying Subject Compositions that have been
27 reproduced and distributed by Defendants Blue Sounds, Orchard, and Amazon
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1 without authorization. These Defendants have willfully infringed, and are
 2 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
 3 methods identified in Exhibit B-7 (or have authorized such activity) without
 4 obtaining authorization to do so.

5 **Eighth Claim – Copyright Infringement**
 6 **Against Shami Media Inc., Believe Digital, and Amazon**

7 167. Plaintiffs repeat each and every allegation of the Complaint.

8 168. As a separate specific course of infringement, Defendants Shami Media
 9 Inc., Believe Digital, and Amazon have unlawfully reproduced and distributed
 10 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
 11 limited to, the recordings identified in Exhibit B-8. Exhibit B-8 sets forth a non-
 12 exhaustive list of specific pirated recordings embodying Subject Compositions that
 13 have been reproduced and distributed by Defendants Shami Media Inc., Believe
 14 Digital, and Amazon without authorization. These Defendants have willfully
 15 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
 16 Compositions by the methods identified in Exhibit B-8 (or have authorized such
 17 activity) without obtaining authorization to do so.

18 **Ninth Claim – Copyright Infringement**
 19 **Against J. Joes J. Edizioni Musicali, Believe Digital, and Amazon**

20 169. Plaintiffs repeat each and every allegation of the Complaint.

21 170. As a separate specific course of infringement, Defendants J. Joes J.
 22 Edizioni Musicali, Believe Digital, and Amazon have unlawfully reproduced and
 23 distributed unauthorized recordings of Plaintiffs' Subject Compositions including,
 24 but not limited to, the recordings identified in Exhibit B-9. Exhibit B-9 sets forth a
 25 non-exhaustive list of specific pirated recordings embodying Subject Compositions
 26 that have been reproduced and distributed by Defendants J. Joes J. Edizioni
 27 Musicali, Believe Digital, and Amazon without authorization. These Defendants
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1 have willfully infringed, and are continuing to infringe, Plaintiffs' copyrights in the
 2 Subject Compositions by the methods identified in Exhibit B-9 (or have authorized
 3 such activity) without obtaining authorization to do so.

4 **Tenth Claim – Copyright Infringement**
 5 **Against TVP, Inc., Orchard, and Amazon**

6 171. Plaintiffs repeat each and every allegation of the Complaint.

7 172. As a separate specific course of infringement, Defendants TVP, Inc.,
 8 Orchard, and Amazon have unlawfully reproduced and distributed unauthorized
 9 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
 10 recordings identified in Exhibit B-10. Exhibit B-10 sets forth a non-exhaustive list
 11 of specific pirated recordings embodying Subject Compositions that have been
 12 reproduced and distributed by Defendants TVP, Inc., Orchard, and Amazon without
 13 authorization. These Defendants have willfully infringed, and are continuing to
 14 infringe, Plaintiffs' copyrights in the Subject Compositions by the methods
 15 identified in Exhibit B-10 (or have authorized such activity) without obtaining
 16 authorization to do so.

17 **Eleventh Claim – Copyright Infringement**
 18 **Against Best Records, Believe Digital, and Amazon**

19 173. Plaintiffs repeat each and every allegation of the Complaint.

20 174. As a separate specific course of infringement, Defendants Best
 21 Records, Believe Digital, and Amazon have unlawfully reproduced and distributed
 22 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
 23 limited to, the recordings identified in Exhibit B-11. Exhibit B-11 sets forth a non-
 24 exhaustive list of specific pirated recordings embodying Subject Compositions that
 25 have been reproduced and distributed by Defendants Best Records, Believe Digital,
 26 and Amazon without authorization. These Defendants have willfully infringed, and
 27 are continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
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1 methods identified in Exhibit B-11 (or have authorized such activity) without
2 obtaining authorization to do so.

3 **Twelfth Claim – Copyright Infringement**
4 **Against Werner Last's Favourites Jazz, Believe Digital, and Amazon**

5 175. Plaintiffs repeat each and every allegation of the Complaint.

6 176. As a separate specific course of infringement, Defendants Werner
7 Last's Favourites Jazz, Believe Digital, and Amazon have unlawfully reproduced
8 and distributed unauthorized recordings of Plaintiffs' Subject Compositions
9 including, but not limited to, the recordings identified in Exhibit B-12. Exhibit B-12
10 sets forth a non-exhaustive list of specific pirated recordings embodying Subject
11 Compositions that have been reproduced and distributed by Defendants Werner
12 Last's Favourites Jazz, Believe Digital, and Amazon without authorization. These
13 Defendants have willfully infringed, and are continuing to infringe, Plaintiffs'
14 copyrights in the Subject Compositions by the methods identified in Exhibit B-12
15 (or have authorized such activity) without obtaining authorization to do so.

16 **Thirteenth Claim – Copyright Infringement**
17 **Against Broken Audio, Ingrooves, and Amazon**

18 177. Plaintiffs repeat each and every allegation of the Complaint.

19 178. As a separate specific course of infringement, Defendants Broken
20 Audio, Ingrooves, and Amazon have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-13. Exhibit B-13 sets forth a non-
23 exhaustive list of specific pirated recordings embodying Subject Compositions that
24 have been reproduced and distributed by Defendants Broken Audio, Ingrooves, and
25 Amazon without authorization. These Defendants have willfully infringed, and are
26 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
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1 methods identified in Exhibit B-13 (or have authorized such activity) without
2 obtaining authorization to do so.

3 **Fourteenth Claim – Copyright Infringement**
4 **Against Pink Dot, "John Doe" Distributor, and Amazon**

5 179. Plaintiffs repeat each and every allegation of the Complaint.

6 180. As a separate specific course of infringement, Defendants Pink Dot,
7 "John Doe" Distributor, and Amazon have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-14. Exhibit B-14 sets forth a non-
10 exhaustive list of specific pirated recordings embodying Subject Compositions that
11 have been reproduced and distributed by Defendants Pink Dot, "John Doe"
12 Distributor, and Amazon without authorization. These Defendants have willfully
13 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
14 Compositions by the methods identified in Exhibit B-14 (or have authorized such
15 activity) without obtaining authorization to do so.

16 **Fifteenth Claim – Copyright Infringement**
17 **Against Vintage Music SL, Orchard, and Amazon**

18 181. Plaintiffs repeat each and every allegation of the Complaint.

19 182. As a separate specific course of infringement, Defendants Vintage
20 Music SL, Orchard, and Amazon have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-15. Exhibit B-15 sets forth a non-
23 exhaustive list of specific pirated recordings embodying Subject Compositions that
24 have been reproduced and distributed by Defendants Vintage Music SL, Orchard,
25 and Amazon without authorization. These Defendants have willfully infringed, and
26 are continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
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1 methods identified in Exhibit B-15 (or have authorized such activity) without
2 obtaining authorization to do so.

3 **Sixteenth Claim – Copyright Infringement**
4 **Against SendDigital, "John Doe" Distributor, and Amazon**

5 183. Plaintiffs repeat each and every allegation of the Complaint.

6 184. As a separate specific course of infringement, Defendants SendDigital,
7 "John Doe" Distributor, and Amazon have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-16. Exhibit B-16 sets forth a non-
10 exhaustive list of specific pirated recordings embodying Subject Compositions that
11 have been reproduced and distributed by Defendants SendDigital, "John Doe"
12 Distributor, and Amazon without authorization. These Defendants have willfully
13 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
14 Compositions by the methods identified in Exhibit B-16 (or have authorized such
15 activity) without obtaining authorization to do so.

16 **Seventeenth Claim – Copyright Infringement**
17 **Against Primephonic USA Inc., Naxos of America, and Amazon**

18 185. Plaintiffs repeat each and every allegation of the Complaint.

19 186. As a separate specific course of infringement, Defendants Primephonic
20 USA Inc., Naxos of America, and Amazon have unlawfully reproduced and
21 distributed unauthorized recordings of Plaintiffs' Subject Compositions including,
22 but not limited to, the recordings identified in Exhibit B-17. Exhibit B-17 sets forth
23 a non-exhaustive list of specific pirated recordings embodying Subject
24 Compositions that have been reproduced and distributed by Defendants
25 Primephonic USA Inc., Naxos of America, and Amazon without authorization.
26 These Defendants have willfully infringed, and are continuing to infringe, Plaintiffs'

1 copyrights in the Subject Compositions by the methods identified in Exhibit B-17
2 (or have authorized such activity) without obtaining authorization to do so.

3 **Eighteenth Claim – Copyright Infringement**
4 **Against Acrobat Music Ltd., Orchard, and Amazon**

5 187. Plaintiffs repeat each and every allegation of the Complaint.

6 188. As a separate specific course of infringement, Defendants Acrobat
7 Music Ltd., Orchard, and Amazon have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-18. Exhibit B-18 sets forth a non-
10 exhaustive list of specific pirated recordings embodying Subject Compositions that
11 have been reproduced and distributed by Defendants Acrobat Music Ltd., Orchard,
12 and Amazon without authorization. These Defendants have willfully infringed, and
13 are continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
14 methods identified in Exhibit B-18 (or have authorized such activity) without
15 obtaining authorization to do so.

16 **Nineteenth Claim – Copyright Infringement**
17 **Against Michael Bennett, "John Doe" Distributor, and Amazon**

18 189. Plaintiffs repeat each and every allegation of the Complaint.

19 190. As a separate specific course of infringement, Defendants Michael
20 Bennett, "John Doe" Distributor, and Amazon have unlawfully reproduced and
21 distributed unauthorized recordings of Plaintiffs' Subject Compositions including,
22 but not limited to, the recordings identified in Exhibit B-19. Exhibit B-19 sets forth
23 a non-exhaustive list of specific pirated recordings embodying Subject
24 Compositions that have been reproduced and distributed by Defendants Michael
25 Bennett, "John Doe" Distributor, and Amazon without authorization. These
26 Defendants have willfully infringed, and are continuing to infringe, Plaintiffs'

1 copyrights in the Subject Compositions by the methods identified in Exhibit B-19
 2 (or have authorized such activity) without obtaining authorization to do so.

3 **Twentieth Claim – Copyright Infringement**
 4 **Against Hasmick Promotions Limited, Orchard, and Amazon**

5 191. Plaintiffs repeat each and every allegation of the Complaint.

6 192. As a separate specific course of infringement, Defendants Hasmick
 7 Promotions Limited, Orchard, and Amazon have unlawfully reproduced and
 8 distributed unauthorized recordings of Plaintiffs' Subject Compositions including,
 9 but not limited to, the recordings identified in Exhibit B-20. Exhibit B-20 sets forth
 10 a non-exhaustive list of specific pirated recordings embodying Subject
 11 Compositions that have been reproduced and distributed by Defendants Hasmick
 12 Promotions Limited, Orchard, and Amazon without authorization. These Defendants
 13 have willfully infringed, and are continuing to infringe, Plaintiffs' copyrights in the
 14 Subject Compositions by the methods identified in Exhibit B-20 (or have authorized
 15 such activity) without obtaining authorization to do so.

16 **Twenty-First Claim – Copyright Infringement**
 17 **Against CTS Digital, State51, and Amazon**

18 193. Plaintiffs repeat each and every allegation of the Complaint.

19 194. As a separate specific course of infringement, Defendants CTS Digital,
 20 State51, and Amazon have unlawfully reproduced and distributed unauthorized
 21 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
 22 recordings identified in Exhibit B-21. Exhibit B-21 sets forth a non-exhaustive list
 23 of specific pirated recordings embodying Subject Compositions that have been
 24 reproduced and distributed by Defendants CTS Digital, State51, and Amazon
 25 without authorization. These Defendants have willfully infringed, and are
 26 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
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1 methods identified in Exhibit B-21 (or have authorized such activity) without
2 obtaining authorization to do so.

3 **Twenty-Second Claim – Copyright Infringement**
4 **Against Future Noise Music Limited, Orchard, and Amazon**

5 195. Plaintiffs repeat each and every allegation of the Complaint.

6 196. As a separate specific course of infringement, Defendants Future Noise
7 Music Limited, Orchard, and Amazon have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-22. Exhibit B-22 sets forth a non-
10 exhaustive list of specific pirated recordings embodying Subject Compositions that
11 have been reproduced and distributed by Defendants Future Noise Music Limited,
12 Orchard, and Amazon without authorization. These Defendants have willfully
13 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
14 Compositions by the methods identified in Exhibit B-22 (or have authorized such
15 activity) without obtaining authorization to do so.

16 **Twenty-Third Claim – Copyright Infringement**
17 **Against Entertain Me Ltd., Orchard, and Amazon**

18 197. Plaintiffs repeat each and every allegation of the Complaint.

19 198. As a separate specific course of infringement, Defendants Entertain Me
20 Ltd., Orchard, and Amazon have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-23. Exhibit B-23 sets forth a non-
23 exhaustive list of specific pirated recordings embodying Subject Compositions that
24 have been reproduced and distributed by Defendants Entertain Me Ltd., Orchard,
25 and Amazon without authorization. These Defendants have willfully infringed, and
26 are continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
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1 methods identified in Exhibit B-23 (or have authorized such activity) without
2 obtaining authorization to do so.

3 **Twenty-Fourth Claim – Copyright Infringement**
4 **Against Marathon Media Int. Ltd., Second Wind Digital and Amazon**

5 199. Plaintiffs repeat each and every allegation of the Complaint.

6 200. As a separate specific course of infringement, Defendants Marathon
7 Media Int. Ltd., Second Wind Digital and Amazon have unlawfully reproduced and
8 distributed unauthorized recordings of Plaintiffs' Subject Compositions including,
9 but not limited to, the recordings identified in Exhibit B-24. Exhibit B-24 sets forth
10 a non-exhaustive list of specific pirated recordings embodying Subject
11 Compositions that have been reproduced and distributed by Defendants Marathon
12 Media Int. Ltd., Second Wind Digital and Amazon without authorization. These
13 Defendants have willfully infringed, and are continuing to infringe, Plaintiffs'
14 copyrights in the Subject Compositions by the methods identified in Exhibit B-24
15 (or have authorized such activity) without obtaining authorization to do so.

16 **Twenty-Fifth Claim – Copyright Infringement**
17 **Against Cherished Records, Ingrooves, and Amazon**

18 201. Plaintiffs repeat each and every allegation of the Complaint.

19 202. As a separate specific course of infringement, Defendants Cherished
20 Records, Ingrooves, and Amazon have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-25. Exhibit B-25 sets forth a non-
23 exhaustive list of specific pirated recordings embodying Subject Compositions that
24 have been reproduced and distributed by Defendants Cherished Records, Ingrooves,
25 and Amazon without authorization. These Defendants have willfully infringed, and
26 are continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
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1 methods identified in Exhibit B-25 (or have authorized such activity) without
2 obtaining authorization to do so.

3 **Twenty-Sixth Claim – Copyright Infringement**
4 **Against Jazzsential, Ingrooves, and Amazon**

5 203. Plaintiffs repeat each and every allegation of the Complaint.

6 204. As a separate specific course of infringement, Defendants Jazzsential,
7 Ingrooves, and Amazon have unlawfully reproduced and distributed unauthorized
8 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
9 recordings identified in Exhibit B-26. Exhibit B-26 sets forth a non-exhaustive list
10 of specific pirated recordings embodying Subject Compositions that have been
11 reproduced and distributed by Defendants Jazzsential, Ingrooves, and Amazon
12 without authorization. These Defendants have willfully infringed, and are
13 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
14 methods identified in Exhibit B-26 (or have authorized such activity) without
15 obtaining authorization to do so.

16 **Twenty-Seventh Claim – Copyright Infringement**
17 **Against Mach60 Music, State51, and Amazon**

18 205. Plaintiffs repeat each and every allegation of the Complaint.

19 206. As a separate specific course of infringement, Defendants Mach60
20 Music, State51, and Amazon have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-27. Exhibit B-27 sets forth a non-
23 exhaustive list of specific pirated recordings embodying Subject Compositions that
24 have been reproduced and distributed by Defendants Mach60 Music, State51, and
25 Amazon without authorization. These Defendants have willfully infringed, and are
26 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
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1 methods identified in Exhibit B-27 (or have authorized such activity) without
2 obtaining authorization to do so.

3 **Twenty-Eighth Claim – Copyright Infringement**
4 **Against Thomas Colley, Believe Digital, and Amazon**

5 207. Plaintiffs repeat each and every allegation of the Complaint.

6 208. As a separate specific course of infringement, Defendants Thomas
7 Colley, Believe Digital, and Amazon have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-28. Exhibit B-28 sets forth a non-
10 exhaustive list of specific pirated recordings embodying Subject Compositions that
11 have been reproduced and distributed by Defendants Thomas Colley, Believe
12 Digital, and Amazon without authorization. These Defendants have willfully
13 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
14 Compositions by the methods identified in Exhibit B-28 (or have authorized such
15 activity) without obtaining authorization to do so.

16 **Twenty-Ninth Claim – Copyright Infringement**
17 **Against DWK Records, Ingrooves, and Amazon**

18 209. Plaintiffs repeat each and every allegation of the Complaint.

19 210. As a separate specific course of infringement, Defendants DWK
20 Records, Ingrooves, and Amazon have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-29. Exhibit B-29 sets forth a non-
23 exhaustive list of specific pirated recordings embodying Subject Compositions that
24 have been reproduced and distributed by Defendants DWK Records, Ingrooves, and
25 Amazon without authorization. These Defendants have willfully infringed, and are
26 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
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1 methods identified in Exhibit B-29 (or have authorized such activity) without
2 obtaining authorization to do so.

3 **Thirtieth Claim – Copyright Infringement**
4 **Against Henry Hadaway Organization Limited, Orchard, and Amazon**

5 211. Plaintiffs repeat each and every allegation of the Complaint.

6 212. As a separate specific course of infringement, Defendants Henry
7 Hadaway Organization Limited, Orchard, and Amazon have unlawfully reproduced
8 and distributed unauthorized recordings of Plaintiffs' Subject Compositions
9 including, but not limited to, the recordings identified in Exhibit B-30. Exhibit B-30
10 sets forth a non-exhaustive list of specific pirated recordings embodying Subject
11 Compositions that have been reproduced and distributed by Defendants Henry
12 Hadaway Organization Limited, Orchard, and Amazon without authorization. These
13 Defendants have willfully infringed, and are continuing to infringe, Plaintiffs'
14 copyrights in the Subject Compositions by the methods identified in Exhibit B-30
15 (or have authorized such activity) without obtaining authorization to do so.

16 **Thirty-First Claim – Copyright Infringement**
17 **Against Avid Group, Orchard, and Amazon**

18 213. Plaintiffs repeat each and every allegation of the Complaint.

19 214. As a separate specific course of infringement, Defendants Avid Group,
20 Orchard, and Amazon have unlawfully reproduced and distributed unauthorized
21 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
22 recordings identified in Exhibit B-31. Exhibit B-31 sets forth a non-exhaustive list
23 of specific pirated recordings embodying Subject Compositions that have been
24 reproduced and distributed by Defendants Avid Group, Orchard, and Amazon
25 without authorization. These Defendants have willfully infringed, and are
26 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
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1 methods identified in Exhibit B-31 (or have authorized such activity) without
2 obtaining authorization to do so.

3 **Thirty-Second Claim – Copyright Infringement**
4 **Against Reloaded Music, Ingrooves, and Amazon**

5 215. Plaintiffs repeat each and every allegation of the Complaint.

6 216. As a separate specific course of infringement, Defendants Reloaded
7 Music, Ingrooves, and Amazon have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-32. Exhibit B-32 sets forth a non-
10 exhaustive list of specific pirated recordings embodying Subject Compositions that
11 have been reproduced and distributed by Defendants Reloaded Music, Ingrooves,
12 and Amazon without authorization. These Defendants have willfully infringed, and
13 are continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
14 methods identified in Exhibit B-32 (or have authorized such activity) without
15 obtaining authorization to do so.

16 **Thirty-Third Claim – Copyright Infringement**
17 **Against Rarity Music, Believe Digital, and Amazon**

18 217. Plaintiffs repeat each and every allegation of the Complaint.

19 218. As a separate specific course of infringement, Defendants Rarity
20 Music, Believe Digital, and Amazon have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-33. Exhibit B-33 sets forth a non-
23 exhaustive list of specific pirated recordings embodying Subject Compositions that
24 have been reproduced and distributed by Defendants Rarity Music, Believe Digital,
25 and Amazon without authorization. These Defendants have willfully infringed, and
26 are continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
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1 methods identified in Exhibit B-33 (or have authorized such activity) without
2 obtaining authorization to do so.

3 **Thirty-Fourth Claim – Copyright Infringement**
4 **Against OVC Media, "John Doe" Distributor, and Amazon**

5 219. Plaintiffs repeat each and every allegation of the Complaint.

6 220. As a separate specific course of infringement, Defendants OVC Media,
7 "John Doe" Distributor, and Amazon have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-34. Exhibit B-34 sets forth a non-
10 exhaustive list of specific pirated recordings embodying Subject Compositions that
11 have been reproduced and distributed by Defendants OVC Media, "John Doe"
12 Distributor, and Amazon without authorization. These Defendants have willfully
13 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
14 Compositions by the methods identified in Exhibit B-34 (or have authorized such
15 activity) without obtaining authorization to do so.

16 **Thirty-Fifth Claim – Copyright Infringement**
17 **Against Historical Jazz, Orchard, and Amazon**

18 221. Plaintiffs repeat each and every allegation of the Complaint.

19 222. As a separate specific course of infringement, Defendants Historical
20 Jazz, Orchard, and Amazon have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-35. Exhibit B-35 sets forth a non-
23 exhaustive list of specific pirated recordings embodying Subject Compositions that
24 have been reproduced and distributed by Defendants Historical Jazz, Orchard, and
25 Amazon without authorization. These Defendants have willfully infringed, and are
26 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
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1 methods identified in Exhibit B-35 (or have authorized such activity) without
2 obtaining authorization to do so.

3 **Thirty-Sixth Claim – Copyright Infringement**
4 **Against Jazz Co., Orchard, and Amazon**

5 223. Plaintiffs repeat each and every allegation of the Complaint.

6 224. As a separate specific course of infringement, Defendants Jazz Co.,
7 Orchard, and Amazon have unlawfully reproduced and distributed unauthorized
8 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
9 recordings identified in Exhibit B-36. Exhibit B-36 sets forth a non-exhaustive list
10 of specific pirated recordings embodying Subject Compositions that have been
11 reproduced and distributed by Defendants Jazz Co., Orchard, and Amazon without
12 authorization. These Defendants have willfully infringed, and are continuing to
13 infringe, Plaintiffs' copyrights in the Subject Compositions by the methods
14 identified in Exhibit B-36 (or have authorized such activity) without obtaining
15 authorization to do so.

16 **Thirty-Seventh Claim – Copyright Infringement**
17 **Against Jazz Moon, Orchard, and Amazon**

18 225. Plaintiffs repeat each and every allegation of the Complaint.

19 226. As a separate specific course of infringement, Defendants Jazz Moon,
20 Orchard, and Amazon have unlawfully reproduced and distributed unauthorized
21 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
22 recordings identified in Exhibit B-37. Exhibit B-37 sets forth a non-exhaustive list
23 of specific pirated recordings embodying Subject Compositions that have been
24 reproduced and distributed by Defendants Jazz Moon, Orchard, and Amazon
25 without authorization. These Defendants have willfully infringed, and are
26 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
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1 methods identified in Exhibit B-37 (or have authorized such activity) without
2 obtaining authorization to do so.

3 **Thirty-Eighth Claim – Copyright Infringement**
4 **Against Plenty Jazz Records, Orchard, and Amazon**

5 227. Plaintiffs repeat each and every allegation of the Complaint.

6 228. As a separate specific course of infringement, Defendants Plenty Jazz
7 Records, Orchard, and Amazon have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-38. Exhibit B-38 sets forth a non-
10 exhaustive list of specific pirated recordings embodying Subject Compositions that
11 have been reproduced and distributed by Defendants Plenty Jazz Records, Orchard,
12 and Amazon without authorization. These Defendants have willfully infringed, and
13 are continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
14 methods identified in Exhibit B-38 (or have authorized such activity) without
15 obtaining authorization to do so.

16 **Thirty-Ninth Claim – Copyright Infringement**
17 **Against Gralin Music, Ingrooves, and Amazon**

18 229. Plaintiffs repeat each and every allegation of the Complaint.

19 230. As a separate specific course of infringement, Defendants Gralin
20 Music, Ingrooves, and Amazon have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-39. Exhibit B-39 sets forth a non-
23 exhaustive list of specific pirated recordings embodying Subject Compositions that
24 have been reproduced and distributed by Defendants Gralin Music, Ingrooves, and
25 Amazon without authorization. These Defendants have willfully infringed, and are
26 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
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1 methods identified in Exhibit B-39 (or have authorized such activity) without
2 obtaining authorization to do so.

3 **Fortieth Claim – Copyright Infringement**
4 **Against Impressions, Orchard, and Amazon**

5 231. Plaintiffs repeat each and every allegation of the Complaint.

6 232. As a separate specific course of infringement, Defendants Impressions,
7 Orchard, and Amazon have unlawfully reproduced and distributed unauthorized
8 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
9 recordings identified in Exhibit B-40. Exhibit B-40 sets forth a non-exhaustive list
10 of specific pirated recordings embodying Subject Compositions that have been
11 reproduced and distributed by Defendants Impressions, Orchard, and Amazon
12 without authorization. These Defendants have willfully infringed, and are
13 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
14 methods identified in Exhibit B-40 (or have authorized such activity) without
15 obtaining authorization to do so.

16 **Forty-First Claim – Copyright Infringement**
17 **Against Lionfish Music, Believe Digital, and Amazon**

18 233. Plaintiffs repeat each and every allegation of the Complaint.

19 234. As a separate specific course of infringement, Defendants Lionfish
20 Music, Believe Digital, and Amazon have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-41. Exhibit B-41 sets forth a non-
23 exhaustive list of specific pirated recordings embodying Subject Compositions that
24 have been reproduced and distributed by Defendants Lionfish Music, Believe
25 Digital, and Amazon without authorization. These Defendants have willfully
26 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
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1 Compositions by the methods identified in Exhibit B-41 (or have authorized such
2 activity) without obtaining authorization to do so.

3 **Forty-Second Claim – Copyright Infringement**
4 **Against Move, Phonofile, and Amazon**

5 235. Plaintiffs repeat each and every allegation of the Complaint.

6 236. As a separate specific course of infringement, Defendants Move,
7 Phonofile, and Amazon have unlawfully reproduced and distributed unauthorized
8 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
9 recordings identified in Exhibit B-42. Exhibit B-42 sets forth a non-exhaustive list
10 of specific pirated recordings embodying Subject Compositions that have been
11 reproduced and distributed by Defendants Move, Phonofile, and Amazon without
12 authorization. These Defendants have willfully infringed, and are continuing to
13 infringe, Plaintiffs' copyrights in the Subject Compositions by the methods
14 identified in Exhibit B-42 (or have authorized such activity) without obtaining
15 authorization to do so.

16 **Forty-Third Claim – Copyright Infringement**
17 **Against Michael Bennett, Ingrooves, and Amazon**

18 237. Plaintiffs repeat each and every allegation of the Complaint.

19 238. As a separate specific course of infringement, Defendants Michael
20 Bennett, Ingrooves, and Amazon have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-43. Exhibit B-43 sets forth a non-
23 exhaustive list of specific pirated recordings embodying Subject Compositions that
24 have been reproduced and distributed by Defendants Michael Bennett, Ingrooves,
25 and Amazon without authorization. These Defendants have willfully infringed, and
26 are continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
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1 methods identified in Exhibit B-43 (or have authorized such activity) without
2 obtaining authorization to do so.

3 **Forty-Fourth Claim – Copyright Infringement**
4 **Against Triton, Orchard, and Amazon**

5 239. Plaintiffs repeat each and every allegation of the Complaint.

6 240. As a separate specific course of infringement, Defendants Triton,
7 Orchard, and Amazon have unlawfully reproduced and distributed unauthorized
8 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
9 recordings identified in Exhibit B-44. Exhibit B-44 sets forth a non-exhaustive list
10 of specific pirated recordings embodying Subject Compositions that have been
11 reproduced and distributed by Defendants Triton, Orchard, and Amazon without
12 authorization. These Defendants have willfully infringed, and are continuing to
13 infringe, Plaintiffs' copyrights in the Subject Compositions by the methods
14 identified in Exhibit B-44 (or have authorized such activity) without obtaining
15 authorization to do so.

16 **Forty-Fifth Claim – Copyright Infringement**
17 **Against Vintage Records, Orchard, and Amazon**

18 241. Plaintiffs repeat each and every allegation of the Complaint.

19 242. As a separate specific course of infringement, Defendants Vintage
20 Records, Orchard, and Amazon have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-45. Exhibit B-45 sets forth a non-
23 exhaustive list of specific pirated recordings embodying Subject Compositions that
24 have been reproduced and distributed by Defendants Vintage Records, Orchard, and
25 Amazon without authorization. These Defendants have willfully infringed, and are
26 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
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1 methods identified in Exhibit B-45 (or have authorized such activity) without
2 obtaining authorization to do so.

3 **Forty-Sixth Claim – Copyright Infringement**
4 **Against Brisa Records, Orchard, and Amazon**

5 243. Plaintiffs repeat each and every allegation of the Complaint.

6 244. As a separate specific course of infringement, Defendants Brisa
7 Records, Orchard, and Amazon have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-46. Exhibit B-46 sets forth a non-
10 exhaustive list of specific pirated recordings embodying Subject Compositions that
11 have been reproduced and distributed by Defendants Brisa Records, Orchard, and
12 Amazon without authorization. These Defendants have willfully infringed, and are
13 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
14 methods identified in Exhibit B-46 (or have authorized such activity) without
15 obtaining authorization to do so.

16 **Forty-Seventh Claim – Copyright Infringement**
17 **Against Favorite Classics, Believe Digital, and Amazon**

18 245. Plaintiffs repeat each and every allegation of the Complaint.

19 246. As a separate specific course of infringement, Defendants Favorite
20 Classics, Believe Digital, and Amazon have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-47. Exhibit B-47 sets forth a non-
23 exhaustive list of specific pirated recordings embodying Subject Compositions that
24 have been reproduced and distributed by Defendants Favorite Classics, Believe
25 Digital, and Amazon without authorization. These Defendants have willfully
26 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
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1 Compositions by the methods identified in Exhibit B-47 (or have authorized such
2 activity) without obtaining authorization to do so.

3 **Forty-Eighth Claim – Copyright Infringement**
4 **Against Classics, "John Doe" Distributor, and Amazon**

5 247. Plaintiffs repeat each and every allegation of the Complaint.

6 248. As a separate specific course of infringement, Defendants Classics,
7 "John Doe" Distributor, and Amazon have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-48. Exhibit B-48 sets forth a non-
10 exhaustive list of specific pirated recordings embodying Subject Compositions that
11 have been reproduced and distributed by Defendants Classics, "John Doe"
12 Distributor, and Amazon without authorization. These Defendants have willfully
13 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
14 Compositions by the methods identified in Exhibit B-48 (or have authorized such
15 activity) without obtaining authorization to do so.

16 **Forty-Ninth Claim – Copyright Infringement**
17 **Against Railroad, Orchard, and Amazon**

18 249. Plaintiffs repeat each and every allegation of the Complaint.

19 250. As a separate specific course of infringement, Defendants Railroad,
20 Orchard, and Amazon have unlawfully reproduced and distributed unauthorized
21 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
22 recordings identified in Exhibit B-49. Exhibit B-49 sets forth a non-exhaustive list
23 of specific pirated recordings embodying Subject Compositions that have been
24 reproduced and distributed by Defendants Railroad, Orchard, and Amazon without
25 authorization. These Defendants have willfully infringed, and are continuing to
26 infringe, Plaintiffs' copyrights in the Subject Compositions by the methods
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1 identified in Exhibit B-49 (or have authorized such activity) without obtaining
2 authorization to do so.

3 **Fiftieth Claim – Copyright Infringement**
4 **Against Digital Gramophone, Orchard, and Amazon**

5 251. Plaintiffs repeat each and every allegation of the Complaint.

6 252. As a separate specific course of infringement, Defendants Digital
7 Gramophone, Orchard, and Amazon have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-50. Exhibit B-50 sets forth a non-
10 exhaustive list of specific pirated recordings embodying Subject Compositions that
11 have been reproduced and distributed by Defendants Digital Gramophone, Orchard,
12 and Amazon without authorization. These Defendants have willfully infringed, and
13 are continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
14 methods identified in Exhibit B-50 (or have authorized such activity) without
15 obtaining authorization to do so.

16 **Fifty-First Claim – Copyright Infringement**
17 **Against Plaza Mayor Company Limited, Orchard, and Amazon**

18 253. Plaintiffs repeat each and every allegation of the Complaint.

19 254. As a separate specific course of infringement, Defendants Plaza Mayor
20 Company Limited, Orchard, and Amazon have unlawfully reproduced and
21 distributed unauthorized recordings of Plaintiffs' Subject Compositions including,
22 but not limited to, the recordings identified in Exhibit B-51. Exhibit B-51 sets forth
23 a non-exhaustive list of specific pirated recordings embodying Subject
24 Compositions that have been reproduced and distributed by Defendants Plaza Mayor
25 Company Limited, Orchard, and Amazon without authorization. These Defendants
26 have willfully infringed, and are continuing to infringe, Plaintiffs' copyrights in the
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1 Subject Compositions by the methods identified in Exhibit B-51 (or have authorized
2 such activity) without obtaining authorization to do so.

3 **Fifty-Second Claim – Copyright Infringement**
4 **Against Blaricum C.D. Company (B.C.D.) BV, Orchard, and Amazon**

5 255. Plaintiffs repeat each and every allegation of the Complaint.

6 256. As a separate specific course of infringement, Defendants Blaricum
7 C.D. Company (B.C.D.) BV, Orchard, and Amazon have unlawfully reproduced and
8 distributed unauthorized recordings of Plaintiffs' Subject Compositions including,
9 but not limited to, the recordings identified in Exhibit B-52. Exhibit B-52 sets forth
10 a non-exhaustive list of specific pirated recordings embodying Subject
11 Compositions that have been reproduced and distributed by Defendants Blaricum
12 C.D. Company (B.C.D.) BV, Orchard, and Amazon without authorization. These
13 Defendants have willfully infringed, and are continuing to infringe, Plaintiffs'
14 copyrights in the Subject Compositions by the methods identified in Exhibit B-52
15 (or have authorized such activity) without obtaining authorization to do so.

16 **Fifty-Third Claim – Copyright Infringement**
17 **Against AP Music Ltd, "John Doe" Distributor, and Amazon**

18 257. Plaintiffs repeat each and every allegation of the Complaint.

19 258. As a separate specific course of infringement, Defendants AP Music
20 Ltd, "John Doe" Distributor, and Amazon have unlawfully reproduced and
21 distributed unauthorized recordings of Plaintiffs' Subject Compositions including,
22 but not limited to, the recordings identified in Exhibit B-53. Exhibit B-53 sets forth
23 a non-exhaustive list of specific pirated recordings embodying Subject
24 Compositions that have been reproduced and distributed by Defendants AP Music
25 Ltd, "John Doe" Distributor, and Amazon without authorization. These Defendants
26 have willfully infringed, and are continuing to infringe, Plaintiffs' copyrights in the
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1 Subject Compositions by the methods identified in Exhibit B-53 (or have authorized
2 such activity) without obtaining authorization to do so.

3 **Fifty-Fourth Claim – Copyright Infringement**
4 **Against ROBA Music Verlag GmbH, Believe Digital, and Amazon**

5 259. Plaintiffs repeat each and every allegation of the Complaint.

6 260. As a separate specific course of infringement, Defendants ROBA
7 Music Verlag GmbH, Believe Digital, and Amazon have unlawfully reproduced and
8 distributed unauthorized recordings of Plaintiffs' Subject Compositions including,
9 but not limited to, the recordings identified in Exhibit B-54. Exhibit B-54 sets forth
10 a non-exhaustive list of specific pirated recordings embodying Subject
11 Compositions that have been reproduced and distributed by Defendants ROBA
12 Music Verlag GmbH, Believe Digital, and Amazon without authorization. These
13 Defendants have willfully infringed, and are continuing to infringe, Plaintiffs'
14 copyrights in the Subject Compositions by the methods identified in Exhibit B-54
15 (or have authorized such activity) without obtaining authorization to do so.

16 **Fifty-Fifth Claim – Copyright Infringement**
17 **Against Cleopatra Records, Inc., "John Doe" Distributor, and Apple**

18 261. Plaintiffs repeat each and every allegation of the Complaint.

19 262. As a separate specific course of infringement, Defendants Cleopatra
20 Records, Inc., "John Doe" Distributor, and Apple have unlawfully reproduced and
21 distributed unauthorized recordings of Plaintiffs' Subject Compositions including,
22 but not limited to, the recordings identified in Exhibit B-55. Exhibit B-55 sets forth
23 a non-exhaustive list of specific pirated recordings embodying Subject
24 Compositions that have been reproduced and distributed by Defendants Cleopatra
25 Records, Inc., "John Doe" Distributor, and Apple without authorization. These
26 Defendants have willfully infringed, and are continuing to infringe, Plaintiffs'

1 copyrights in the Subject Compositions by the methods identified in Exhibit B-55
2 (or have authorized such activity) without obtaining authorization to do so.

3 **Fifty-Sixth Claim – Copyright Infringement**
4 **Against Pickwick Group Limited, Orchard, and Apple**

5 263. Plaintiffs repeat each and every allegation of the Complaint.

6 264. As a separate specific course of infringement, Defendants Pickwick
7 Group Limited, Orchard, and Apple have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-56. Exhibit B-56 sets forth a non-
10 exhaustive list of specific pirated recordings embodying Subject Compositions that
11 have been reproduced and distributed by Defendants Pickwick Group Limited,
12 Orchard, and Apple without authorization. These Defendants have willfully
13 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
14 Compositions by the methods identified in Exhibit B-56 (or have authorized such
15 activity) without obtaining authorization to do so.

16 **Fifty-Seventh Claim – Copyright Infringement**
17 **Against Cleopatra Records, Inc., Orchard, and Apple**

18 265. Plaintiffs repeat each and every allegation of the Complaint.

19 266. As a separate specific course of infringement, Defendants Cleopatra
20 Records, Inc., Orchard, and Apple have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-57. Exhibit B-57 sets forth a non-
23 exhaustive list of specific pirated recordings embodying Subject Compositions that
24 have been reproduced and distributed by Defendants Cleopatra Records, Inc.,
25 Orchard, and Apple without authorization. These Defendants have willfully
26 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
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1 Compositions by the methods identified in Exhibit B-57 (or have authorized such
2 activity) without obtaining authorization to do so.

3 **Fifty-Eighth Claim – Copyright Infringement**
4 **Against Cugate Ltd., Believe Digital, and Apple**

5 267. Plaintiffs repeat each and every allegation of the Complaint.

6 268. As a separate specific course of infringement, Defendants Cugate Ltd.,
7 Believe Digital, and Apple have unlawfully reproduced and distributed unauthorized
8 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
9 recordings identified in Exhibit B-58. Exhibit B-58 sets forth a non-exhaustive list
10 of specific pirated recordings embodying Subject Compositions that have been
11 reproduced and distributed by Defendants Cugate Ltd., Believe Digital, and Apple
12 without authorization. These Defendants have willfully infringed, and are
13 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
14 methods identified in Exhibit B-58 (or have authorized such activity) without
15 obtaining authorization to do so.

16 **Fifty-Ninth Claim – Copyright Infringement**
17 **Against Ideal Music, Ingrooves, and Apple**

18 269. Plaintiffs repeat each and every allegation of the Complaint.

19 270. As a separate specific course of infringement, Defendants Ideal Music,
20 Ingrooves, and Apple have unlawfully reproduced and distributed unauthorized
21 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
22 recordings identified in Exhibit B-59. Exhibit B-59 sets forth a non-exhaustive list
23 of specific pirated recordings embodying Subject Compositions that have been
24 reproduced and distributed by Defendants Ideal Music, Ingrooves, and Apple
25 without authorization. These Defendants have willfully infringed, and are
26 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
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1 methods identified in Exhibit B-59 (or have authorized such activity) without
2 obtaining authorization to do so.

3 **Sixtieth Claim – Copyright Infringement**
4 **Against Blue Sounds, Orchard, and Apple**

5 271. Plaintiffs repeat each and every allegation of the Complaint.

6 272. As a separate specific course of infringement, Defendants Blue Sounds,
7 Orchard, and Apple have unlawfully reproduced and distributed unauthorized
8 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
9 recordings identified in Exhibit B-60. Exhibit B-60 sets forth a non-exhaustive list
10 of specific pirated recordings embodying Subject Compositions that have been
11 reproduced and distributed by Defendants Blue Sounds, Orchard, and Apple without
12 authorization. These Defendants have willfully infringed, and are continuing to
13 infringe, Plaintiffs' copyrights in the Subject Compositions by the methods
14 identified in Exhibit B-60 (or have authorized such activity) without obtaining
15 authorization to do so.

16 **Sixty-First Claim – Copyright Infringement**
17 **Against Wnts, Believe Digital, and Apple**

18 273. Plaintiffs repeat each and every allegation of the Complaint.

19 274. As a separate specific course of infringement, Defendants Wnts,
20 Believe Digital, and Apple have unlawfully reproduced and distributed unauthorized
21 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
22 recordings identified in Exhibit B-61. Exhibit B-61 sets forth a non-exhaustive list
23 of specific pirated recordings embodying Subject Compositions that have been
24 reproduced and distributed by Defendants Wnts, Believe Digital, and Apple without
25 authorization. These Defendants have willfully infringed, and are continuing to
26 infringe, Plaintiffs' copyrights in the Subject Compositions by the methods
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1 identified in Exhibit B-61 (or have authorized such activity) without obtaining
2 authorization to do so.

3 **Sixty-Second Claim – Copyright Infringement**
4 **Against TVP, Inc., Orchard, and Apple**

5 275. Plaintiffs repeat each and every allegation of the Complaint.

6 276. As a separate specific course of infringement, Defendants TVP, Inc.,
7 Orchard, and Apple have unlawfully reproduced and distributed unauthorized
8 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
9 recordings identified in Exhibit B-62. Exhibit B-62 sets forth a non-exhaustive list
10 of specific pirated recordings embodying Subject Compositions that have been
11 reproduced and distributed by Defendants TVP, Inc., Orchard, and Apple without
12 authorization. These Defendants have willfully infringed, and are continuing to
13 infringe, Plaintiffs' copyrights in the Subject Compositions by the methods
14 identified in Exhibit B-62 (or have authorized such activity) without obtaining
15 authorization to do so.

16 **Sixty-Third Claim – Copyright Infringement**
17 **Against Smith & Co B.V., Orchard, and Apple**

18 277. Plaintiffs repeat each and every allegation of the Complaint.

19 278. As a separate specific course of infringement, Defendants Smith & Co
20 B.V., Orchard, and Apple have unlawfully reproduced and distributed unauthorized
21 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
22 recordings identified in Exhibit B-63. Exhibit B-63 sets forth a non-exhaustive list
23 of specific pirated recordings embodying Subject Compositions that have been
24 reproduced and distributed by Defendants Smith & Co B.V., Orchard, and Apple
25 without authorization. These Defendants have willfully infringed, and are
26 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
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1 methods identified in Exhibit B-63 (or have authorized such activity) without
2 obtaining authorization to do so.

3 **Sixty-Fourth Claim – Copyright Infringement**
4 **Against Xelon Entertainment Pty. Ltd., "John Doe" Distributor, and Apple**

5 279. Plaintiffs repeat each and every allegation of the Complaint.

6 280. As a separate specific course of infringement, Defendants Xelon
7 Entertainment Pty. Ltd., "John Doe" Distributor, and Apple have unlawfully
8 reproduced and distributed unauthorized recordings of Plaintiffs' Subject
9 Compositions including, but not limited to, the recordings identified in Exhibit B-
10 64. Exhibit B-64 sets forth a non-exhaustive list of specific pirated recordings
11 embodying Subject Compositions that have been reproduced and distributed by
12 Defendants Xelon Entertainment Pty. Ltd., "John Doe" Distributor, and Apple
13 without authorization. These Defendants have willfully infringed, and are
14 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
15 methods identified in Exhibit B-64 (or have authorized such activity) without
16 obtaining authorization to do so.

17 **Sixty-Fifth Claim – Copyright Infringement**
18 **Against Broken Audio, Ingrooves, and Apple**

19 281. Plaintiffs repeat each and every allegation of the Complaint.

20 282. As a separate specific course of infringement, Defendants Broken
21 Audio, Ingrooves, and Apple have unlawfully reproduced and distributed
22 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
23 limited to, the recordings identified in Exhibit B-65. Exhibit B-65 sets forth a non-
24 exhaustive list of specific pirated recordings embodying Subject Compositions that
25 have been reproduced and distributed by Defendants Broken Audio, Ingrooves, and
26 Apple without authorization. These Defendants have willfully infringed, and are
27 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
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1 methods identified in Exhibit B-65 (or have authorized such activity) without
2 obtaining authorization to do so.

3 **Sixty-Sixth Claim – Copyright Infringement**
4 **Against Bacci Bros Records, "John Doe" Distributor, and Apple**

5 283. Plaintiffs repeat each and every allegation of the Complaint.

6 284. As a separate specific course of infringement, Defendants Bacci Bros
7 Records, "John Doe" Distributor, and Apple have unlawfully reproduced and
8 distributed unauthorized recordings of Plaintiffs' Subject Compositions including,
9 but not limited to, the recordings identified in Exhibit B-66. Exhibit B-66 sets forth
10 a non-exhaustive list of specific pirated recordings embodying Subject
11 Compositions that have been reproduced and distributed by Defendants Bacci Bros
12 Records, "John Doe" Distributor, and Apple without authorization. These
13 Defendants have willfully infringed, and are continuing to infringe, Plaintiffs'
14 copyrights in the Subject Compositions by the methods identified in Exhibit B-66
15 (or have authorized such activity) without obtaining authorization to do so.

16 **Sixty-Seventh Claim – Copyright Infringement**
17 **Against Vintage Music SL, Orchard, and Apple**

18 285. Plaintiffs repeat each and every allegation of the Complaint.

19 286. As a separate specific course of infringement, Defendants Vintage
20 Music SL, Orchard, and Apple have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-67. Exhibit B-67 sets forth a non-
23 exhaustive list of specific pirated recordings embodying Subject Compositions that
24 have been reproduced and distributed by Defendants Vintage Music SL, Orchard,
25 and Apple without authorization. These Defendants have willfully infringed, and are
26 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
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1 methods identified in Exhibit B-67 (or have authorized such activity) without
2 obtaining authorization to do so.

3 **Sixty-Eighth Claim – Copyright Infringement**
4 **Against Adasam Limited and Apple**

5 287. Plaintiffs repeat each and every allegation of the Complaint.

6 288. As a separate specific course of infringement, Defendants Adasam
7 Limited and Apple have unlawfully reproduced and distributed unauthorized
8 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
9 recordings identified in Exhibit B-68. Exhibit B-68 sets forth a non-exhaustive list
10 of specific pirated recordings embodying Subject Compositions that have been
11 reproduced and distributed by Defendants Adasam Limited and Apple without
12 authorization. These Defendants have willfully infringed, and are continuing to
13 infringe, Plaintiffs' copyrights in the Subject Compositions by the methods
14 identified in Exhibit B-68 (or have authorized such activity) without obtaining
15 authorization to do so.

16 **Sixty-Ninth Claim – Copyright Infringement**
17 **Against Best Records, Believe Digital, and Apple**

18 289. Plaintiffs repeat each and every allegation of the Complaint.

19 290. As a separate specific course of infringement, Defendants Best
20 Records, Believe Digital, and Apple have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-69. Exhibit B-69 sets forth a non-
23 exhaustive list of specific pirated recordings embodying Subject Compositions that
24 have been reproduced and distributed by Defendants Best Records, Believe Digital,
25 and Apple without authorization. These Defendants have willfully infringed, and are
26 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
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1 methods identified in Exhibit B-69 (or have authorized such activity) without
2 obtaining authorization to do so.

3 **Seventieth Claim – Copyright Infringement**
4 **Against Future Noise Music Limited, Orchard, and Apple**

5 291. Plaintiffs repeat each and every allegation of the Complaint.

6 292. As a separate specific course of infringement, Defendants Future Noise
7 Music Limited, Orchard, and Apple have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-70. Exhibit B-70 sets forth a non-
10 exhaustive list of specific pirated recordings embodying Subject Compositions that
11 have been reproduced and distributed by Defendants Future Noise Music Limited,
12 Orchard, and Apple without authorization. These Defendants have willfully
13 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
14 Compositions by the methods identified in Exhibit B-70 (or have authorized such
15 activity) without obtaining authorization to do so.

16 **Seventy-First Claim – Copyright Infringement**
17 **Against Acrobat Music Ltd., Orchard, and Apple**

18 293. Plaintiffs repeat each and every allegation of the Complaint.

19 294. As a separate specific course of infringement, Defendants Acrobat
20 Music Ltd., Orchard, and Apple have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-71. Exhibit B-71 sets forth a non-
23 exhaustive list of specific pirated recordings embodying Subject Compositions that
24 have been reproduced and distributed by Defendants Acrobat Music Ltd., Orchard,
25 and Apple without authorization. These Defendants have willfully infringed, and are
26 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
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1 methods identified in Exhibit B-71 (or have authorized such activity) without
2 obtaining authorization to do so.

3 **Seventy-Second Claim – Copyright Infringement**
4 **Against J. Joes J. Edizioni Musicali, Believe Digital, and Apple**

5 295. Plaintiffs repeat each and every allegation of the Complaint.

6 296. As a separate specific course of infringement, Defendants J. Joes J.
7 Edizioni Musicali, Believe Digital, and Apple have unlawfully reproduced and
8 distributed unauthorized recordings of Plaintiffs' Subject Compositions including,
9 but not limited to, the recordings identified in Exhibit B-72. Exhibit B-72 sets forth
10 a non-exhaustive list of specific pirated recordings embodying Subject
11 Compositions that have been reproduced and distributed by Defendants J. Joes J.
12 Edizioni Musicali, Believe Digital, and Apple without authorization. These
13 Defendants have willfully infringed, and are continuing to infringe, Plaintiffs'
14 copyrights in the Subject Compositions by the methods identified in Exhibit B-72
15 (or have authorized such activity) without obtaining authorization to do so.

16 **Seventy-Third Claim – Copyright Infringement**
17 **Against Impressions, Orchard, and Apple**

18 297. Plaintiffs repeat each and every allegation of the Complaint.

19 298. As a separate specific course of infringement, Defendants Impressions,
20 Orchard, and Apple have unlawfully reproduced and distributed unauthorized
21 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
22 recordings identified in Exhibit B-73. Exhibit B-73 sets forth a non-exhaustive list
23 of specific pirated recordings embodying Subject Compositions that have been
24 reproduced and distributed by Defendants Impressions, Orchard, and Apple without
25 authorization. These Defendants have willfully infringed, and are continuing to
26 infringe, Plaintiffs' copyrights in the Subject Compositions by the methods
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1 identified in Exhibit B-73 (or have authorized such activity) without obtaining
2 authorization to do so.

3 **Seventy-Fourth Claim – Copyright Infringement**
4 **Against Pink Dot, "John Doe" Distributor, and Apple**

5 299. Plaintiffs repeat each and every allegation of the Complaint.

6 300. As a separate specific course of infringement, Defendants Pink Dot,
7 "John Doe" Distributor, and Apple have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-74. Exhibit B-74 sets forth a non-
10 exhaustive list of specific pirated recordings embodying Subject Compositions that
11 have been reproduced and distributed by Defendants Pink Dot, "John Doe"
12 Distributor, and Apple without authorization. These Defendants have willfully
13 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
14 Compositions by the methods identified in Exhibit B-74 (or have authorized such
15 activity) without obtaining authorization to do so.

16 **Seventy-Fifth Claim – Copyright Infringement**
17 **Against Henry Hadaway Organization Limited, Orchard, and Apple**

18 301. Plaintiffs repeat each and every allegation of the Complaint.

19 302. As a separate specific course of infringement, Defendants Henry
20 Hadaway Organization Limited, Orchard, and Apple have unlawfully reproduced
21 and distributed unauthorized recordings of Plaintiffs' Subject Compositions
22 including, but not limited to, the recordings identified in Exhibit B-75. Exhibit B-75
23 sets forth a non-exhaustive list of specific pirated recordings embodying Subject
24 Compositions that have been reproduced and distributed by Defendants Henry
25 Hadaway Organization Limited, Orchard, and Apple without authorization. These
26 Defendants have willfully infringed, and are continuing to infringe, Plaintiffs'

1 copyrights in the Subject Compositions by the methods identified in Exhibit B-75
 2 (or have authorized such activity) without obtaining authorization to do so.

3 **Seventy-Sixth Claim – Copyright Infringement**
 4 **Against Railroad, Orchard, and Apple**

5 303. Plaintiffs repeat each and every allegation of the Complaint.

6 304. As a separate specific course of infringement, Defendants Railroad,
 7 Orchard, and Apple have unlawfully reproduced and distributed unauthorized
 8 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
 9 recordings identified in Exhibit B-76. Exhibit B-76 sets forth a non-exhaustive list
 10 of specific pirated recordings embodying Subject Compositions that have been
 11 reproduced and distributed by Defendants Railroad, Orchard, and Apple without
 12 authorization. These Defendants have willfully infringed, and are continuing to
 13 infringe, Plaintiffs' copyrights in the Subject Compositions by the methods
 14 identified in Exhibit B-76 (or have authorized such activity) without obtaining
 15 authorization to do so.

16 **Seventy-Seventh Claim – Copyright Infringement**
 17 **Against Move, Phonofile, and Apple**

18 305. Plaintiffs repeat each and every allegation of the Complaint.

19 306. As a separate specific course of infringement, Defendants Move,
 20 Phonofile, and Apple have unlawfully reproduced and distributed unauthorized
 21 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
 22 recordings identified in Exhibit B-77. Exhibit B-77 sets forth a non-exhaustive list
 23 of specific pirated recordings embodying Subject Compositions that have been
 24 reproduced and distributed by Defendants Move, Phonofile, and Apple without
 25 authorization. These Defendants have willfully infringed, and are continuing to
 26 infringe, Plaintiffs' copyrights in the Subject Compositions by the methods
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1 identified in Exhibit B-77 (or have authorized such activity) without obtaining
2 authorization to do so.

3 **Seventy-Eighth Claim – Copyright Infringement**
4 **Against Thomas Colley, Believe Digital, and Apple**

5 307. Plaintiffs repeat each and every allegation of the Complaint.

6 308. As a separate specific course of infringement, Defendants Thomas
7 Colley, Believe Digital, and Apple have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-78. Exhibit B-78 sets forth a non-
10 exhaustive list of specific pirated recordings embodying Subject Compositions that
11 have been reproduced and distributed by Defendants Thomas Colley, Believe
12 Digital, and Apple without authorization. These Defendants have willfully infringed,
13 and are continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by
14 the methods identified in Exhibit B-78 (or have authorized such activity) without
15 obtaining authorization to do so.

16 **Seventy-Ninth Claim – Copyright Infringement**
17 **Against OVC Media, "John Doe" Distributor, and Apple**

18 309. Plaintiffs repeat each and every allegation of the Complaint.

19 310. As a separate specific course of infringement, Defendants OVC Media,
20 "John Doe" Distributor, and Apple have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-79. Exhibit B-79 sets forth a non-
23 exhaustive list of specific pirated recordings embodying Subject Compositions that
24 have been reproduced and distributed by Defendants OVC Media, "John Doe"
25 Distributor, and Apple without authorization. These Defendants have willfully
26 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
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1 Compositions by the methods identified in Exhibit B-79 (or have authorized such
2 activity) without obtaining authorization to do so.

3 **Eightieth Claim – Copyright Infringement**
4 **Against Favorite Classics, Believe Digital, and Apple**

5 311. Plaintiffs repeat each and every allegation of the Complaint.

6 312. As a separate specific course of infringement, Defendants Favorite
7 Classics, Believe Digital, and Apple have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-80. Exhibit B-80 sets forth a non-
10 exhaustive list of specific pirated recordings embodying Subject Compositions that
11 have been reproduced and distributed by Defendants Favorite Classics, Believe
12 Digital, and Apple without authorization. These Defendants have willfully infringed,
13 and are continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by
14 the methods identified in Exhibit B-80 (or have authorized such activity) without
15 obtaining authorization to do so.

16 **Eighty-First Claim – Copyright Infringement**
17 **Against Brisa Records, Orchard, and Apple**

18 313. Plaintiffs repeat each and every allegation of the Complaint.

19 314. As a separate specific course of infringement, Defendants Brisa
20 Records, Orchard, and Apple have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-81. Exhibit B-81 sets forth a non-
23 exhaustive list of specific pirated recordings embodying Subject Compositions that
24 have been reproduced and distributed by Defendants Brisa Records, Orchard, and
25 Apple without authorization. These Defendants have willfully infringed, and are
26 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
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1 methods identified in Exhibit B-81 (or have authorized such activity) without
2 obtaining authorization to do so.

3 **Eighty-Second Claim – Copyright Infringement**
4 **Against DWK Records, Ingrooves, and Apple**

5 315. Plaintiffs repeat each and every allegation of the Complaint.

6 316. As a separate specific course of infringement, Defendants DWK
7 Records, Ingrooves, and Apple have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-82. Exhibit B-82 sets forth a non-
10 exhaustive list of specific pirated recordings embodying Subject Compositions that
11 have been reproduced and distributed by Defendants DWK Records, Ingrooves, and
12 Apple without authorization. These Defendants have willfully infringed, and are
13 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
14 methods identified in Exhibit B-82 (or have authorized such activity) without
15 obtaining authorization to do so.

16 **Eighty-Third Claim – Copyright Infringement**
17 **Against Michael Bennett, Ingrooves, and Apple**

18 317. Plaintiffs repeat each and every allegation of the Complaint.

19 318. As a separate specific course of infringement, Defendants Michael
20 Bennett, Ingrooves, and Apple have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-83. Exhibit B-83 sets forth a non-
23 exhaustive list of specific pirated recordings embodying Subject Compositions that
24 have been reproduced and distributed by Defendants Michael Bennett, Ingrooves,
25 and Apple without authorization. These Defendants have willfully infringed, and are
26 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
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1 methods identified in Exhibit B-83 (or have authorized such activity) without
2 obtaining authorization to do so.

3 **Eighty-Fourth Claim – Copyright Infringement**
4 **Against Gralin Music, Ingrooves, and Apple**

5 319. Plaintiffs repeat each and every allegation of the Complaint.

6 320. As a separate specific course of infringement, Defendants Gralin
7 Music, Ingrooves, and Apple have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-84. Exhibit B-84 sets forth a non-
10 exhaustive list of specific pirated recordings embodying Subject Compositions that
11 have been reproduced and distributed by Defendants Gralin Music, Ingrooves, and
12 Apple without authorization. These Defendants have willfully infringed, and are
13 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
14 methods identified in Exhibit B-84 (or have authorized such activity) without
15 obtaining authorization to do so.

16 **Eighty-Fifth Claim – Copyright Infringement**
17 **Against ROBA Music Verlag GmbH, Believe Digital, and Apple**

18 321. Plaintiffs repeat each and every allegation of the Complaint.

19 322. As a separate specific course of infringement, Defendants ROBA
20 Music Verlag GmbH, Believe Digital, and Apple have unlawfully reproduced and
21 distributed unauthorized recordings of Plaintiffs' Subject Compositions including,
22 but not limited to, the recordings identified in Exhibit B-85. Exhibit B-85 sets forth
23 a non-exhaustive list of specific pirated recordings embodying Subject
24 Compositions that have been reproduced and distributed by Defendants ROBA
25 Music Verlag GmbH, Believe Digital, and Apple without authorization. These
26 Defendants have willfully infringed, and are continuing to infringe, Plaintiffs'

1 copyrights in the Subject Compositions by the methods identified in Exhibit B-85
2 (or have authorized such activity) without obtaining authorization to do so.

3 **Eighty-Sixth Claim – Copyright Infringement**
4 **Against Primephonic USA Inc., Naxos of America, and Apple**

5 323. Plaintiffs repeat each and every allegation of the Complaint.

6 324. As a separate specific course of infringement, Defendants Primephonic
7 USA Inc., Naxos of America, and Apple have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-86. Exhibit B-86 sets forth a non-
10 exhaustive list of specific pirated recordings embodying Subject Compositions that
11 have been reproduced and distributed by Defendants Primephonic USA Inc., Naxos
12 of America, and Apple without authorization. These Defendants have willfully
13 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
14 Compositions by the methods identified in Exhibit B-86 (or have authorized such
15 activity) without obtaining authorization to do so.

16 **Eighty-Seventh Claim – Copyright Infringement**
17 **Against Jazzsential, Ingrooves, and Apple**

18 325. Plaintiffs repeat each and every allegation of the Complaint.

19 326. As a separate specific course of infringement, Defendants Jazzsential,
20 Ingrooves, and Apple have unlawfully reproduced and distributed unauthorized
21 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
22 recordings identified in Exhibit B-87. Exhibit B-87 sets forth a non-exhaustive list
23 of specific pirated recordings embodying Subject Compositions that have been
24 reproduced and distributed by Defendants Jazzsential, Ingrooves, and Apple without
25 authorization. These Defendants have willfully infringed, and are continuing to
26 infringe, Plaintiffs' copyrights in the Subject Compositions by the methods
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1 identified in Exhibit B-87 (or have authorized such activity) without obtaining
2 authorization to do so.

3 **Eighty-Eighth Claim – Copyright Infringement**
4 **Against AP Music Ltd, "John Doe" Distributor, and Apple**

5 327. Plaintiffs repeat each and every allegation of the Complaint.

6 328. As a separate specific course of infringement, Defendants AP Music
7 Ltd, "John Doe" Distributor, and Apple have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-88. Exhibit B-88 sets forth a non-
10 exhaustive list of specific pirated recordings embodying Subject Compositions that
11 have been reproduced and distributed by Defendants AP Music Ltd, "John Doe"
12 Distributor, and Apple without authorization. These Defendants have willfully
13 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
14 Compositions by the methods identified in Exhibit B-88 (or have authorized such
15 activity) without obtaining authorization to do so.

16 **Eighty-Ninth Claim – Copyright Infringement**
17 **Against Mach60 Music, State51, and Apple**

18 329. Plaintiffs repeat each and every allegation of the Complaint.

19 330. As a separate specific course of infringement, Defendants Mach60
20 Music, State51, and Apple have unlawfully reproduced and distributed unauthorized
21 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
22 recordings identified in Exhibit B-89. Exhibit B-89 sets forth a non-exhaustive list
23 of specific pirated recordings embodying Subject Compositions that have been
24 reproduced and distributed by Defendants Mach60 Music, State51, and Apple
25 without authorization. These Defendants have willfully infringed, and are
26 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
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1 methods identified in Exhibit B-89 (or have authorized such activity) without
2 obtaining authorization to do so.

3 **Ninetieth Claim – Copyright Infringement**
4 **Against Blaricum C.D. Company (B.C.D.) BV, Orchard, and Apple**

5 331. Plaintiffs repeat each and every allegation of the Complaint.

6 332. As a separate specific course of infringement, Defendants Blaricum
7 C.D. Company (B.C.D.) BV, Orchard, and Apple have unlawfully reproduced and
8 distributed unauthorized recordings of Plaintiffs' Subject Compositions including,
9 but not limited to, the recordings identified in Exhibit B-90. Exhibit B-90 sets forth
10 a non-exhaustive list of specific pirated recordings embodying Subject
11 Compositions that have been reproduced and distributed by Defendants Blaricum
12 C.D. Company (B.C.D.) BV, Orchard, and Apple without authorization. These
13 Defendants have willfully infringed, and are continuing to infringe, Plaintiffs'
14 copyrights in the Subject Compositions by the methods identified in Exhibit B-90
15 (or have authorized such activity) without obtaining authorization to do so.

16 **Ninety-First Claim – Copyright Infringement**
17 **Against Digital Gramophone, Orchard, and Apple**

18 333. Plaintiffs repeat each and every allegation of the Complaint.

19 334. As a separate specific course of infringement, Defendants Digital
20 Gramophone, Orchard, and Apple have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-91. Exhibit B-91 sets forth a non-
23 exhaustive list of specific pirated recordings embodying Subject Compositions that
24 have been reproduced and distributed by Defendants Digital Gramophone, Orchard,
25 and Apple without authorization. These Defendants have willfully infringed, and are
26 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
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1 methods identified in Exhibit B-91 (or have authorized such activity) without
2 obtaining authorization to do so.

3 **Ninety-Second Claim – Copyright Infringement**
4 **Against Classics, "John Doe" Distributor, and Apple**

5 335. Plaintiffs repeat each and every allegation of the Complaint.

6 336. As a separate specific course of infringement, Defendants Classics,
7 "John Doe" Distributor, and Apple have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-92. Exhibit B-92 sets forth a non-
10 exhaustive list of specific pirated recordings embodying Subject Compositions that
11 have been reproduced and distributed by Defendants Classics, "John Doe"
12 Distributor, and Apple without authorization. These Defendants have willfully
13 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
14 Compositions by the methods identified in Exhibit B-92 (or have authorized such
15 activity) without obtaining authorization to do so.

16 **Ninety-Third Claim – Copyright Infringement**
17 **Against Vintage Records, Orchard, and Apple**

18 337. Plaintiffs repeat each and every allegation of the Complaint.

19 338. As a separate specific course of infringement, Defendants Vintage
20 Records, Orchard, and Apple have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-93. Exhibit B-93 sets forth a non-
23 exhaustive list of specific pirated recordings embodying Subject Compositions that
24 have been reproduced and distributed by Defendants Vintage Records, Orchard, and
25 Apple without authorization. These Defendants have willfully infringed, and are
26 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
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1 methods identified in Exhibit B-93 (or have authorized such activity) without
2 obtaining authorization to do so.

3 **Ninety-Fourth Claim – Copyright Infringement**
4 **Against Cleopatra Records, Inc., "John Doe" Distributor, and Google**

5 339. Plaintiffs repeat each and every allegation of the Complaint.

6 340. As a separate specific course of infringement, Defendants Cleopatra
7 Records, Inc., "John Doe" Distributor, and Google have unlawfully reproduced and
8 distributed unauthorized recordings of Plaintiffs' Subject Compositions including,
9 but not limited to, the recordings identified in Exhibit B-94. Exhibit B-94 sets forth
10 a non-exhaustive list of specific pirated recordings embodying Subject
11 Compositions that have been reproduced and distributed by Defendants Cleopatra
12 Records, Inc., "John Doe" Distributor, and Google without authorization. These
13 Defendants have willfully infringed, and are continuing to infringe, Plaintiffs'
14 copyrights in the Subject Compositions by the methods identified in Exhibit B-94
15 (or have authorized such activity) without obtaining authorization to do so.

16 **Ninety-Fifth Claim – Copyright Infringement**
17 **Against Cleopatra Records, Inc., Orchard, and Google**

18 341. Plaintiffs repeat each and every allegation of the Complaint.

19 342. As a separate specific course of infringement, Defendants Cleopatra
20 Records, Inc., Orchard, and Google have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-95. Exhibit B-95 sets forth a non-
23 exhaustive list of specific pirated recordings embodying Subject Compositions that
24 have been reproduced and distributed by Defendants Cleopatra Records, Inc.,
25 Orchard, and Google without authorization. These Defendants have willfully
26 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
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1 Compositions by the methods identified in Exhibit B-95 (or have authorized such
2 activity) without obtaining authorization to do so.

3 **Ninety-Sixth Claim – Copyright Infringement**
4 **Against Pickwick Group Limited, Orchard, and Google**

5 343. Plaintiffs repeat each and every allegation of the Complaint.

6 344. As a separate specific course of infringement, Defendants Pickwick
7 Group Limited, Orchard, and Google have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-96. Exhibit B-96 sets forth a non-
10 exhaustive list of specific pirated recordings embodying Subject Compositions that
11 have been reproduced and distributed by Defendants Pickwick Group Limited,
12 Orchard, and Google without authorization. These Defendants have willfully
13 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
14 Compositions by the methods identified in Exhibit B-96 (or have authorized such
15 activity) without obtaining authorization to do so.

16 **Ninety-Seventh Claim – Copyright Infringement**
17 **Against Marathon Media Int. Ltd., Second Wind Digital and Google**

18 345. Plaintiffs repeat each and every allegation of the Complaint.

19 346. As a separate specific course of infringement, Defendants Marathon
20 Media Int. Ltd., Second Wind Digital and Google have unlawfully reproduced and
21 distributed unauthorized recordings of Plaintiffs' Subject Compositions including,
22 but not limited to, the recordings identified in Exhibit B-97. Exhibit B-97 sets forth
23 a non-exhaustive list of specific pirated recordings embodying Subject
24 Compositions that have been reproduced and distributed by Defendants Marathon
25 Media Int. Ltd., Second Wind Digital and Google without authorization. These
26 Defendants have willfully infringed, and are continuing to infringe, Plaintiffs'

1 copyrights in the Subject Compositions by the methods identified in Exhibit B-97
 2 (or have authorized such activity) without obtaining authorization to do so.

3 **Ninety-Eighth Claim – Copyright Infringement**
 4 **Against Cugate Ltd., Believe Digital, and Google**

5 347. Plaintiffs repeat each and every allegation of the Complaint.

6 348. As a separate specific course of infringement, Defendants Cugate Ltd.,
 7 Believe Digital, and Google have unlawfully reproduced and distributed
 8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
 9 limited to, the recordings identified in Exhibit B-98. Exhibit B-98 sets forth a non-
 10 exhaustive list of specific pirated recordings embodying Subject Compositions that
 11 have been reproduced and distributed by Defendants Cugate Ltd., Believe Digital,
 12 and Google without authorization. These Defendants have willfully infringed, and
 13 are continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
 14 methods identified in Exhibit B-98 (or have authorized such activity) without
 15 obtaining authorization to do so.

16 **Ninety-Ninth Claim – Copyright Infringement**
 17 **Against Shami Media Inc., Believe Digital, and Google**

18 349. Plaintiffs repeat each and every allegation of the Complaint.

19 350. As a separate specific course of infringement, Defendants Shami Media
 20 Inc., Believe Digital, and Google have unlawfully reproduced and distributed
 21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
 22 limited to, the recordings identified in Exhibit B-99. Exhibit B-99 sets forth a non-
 23 exhaustive list of specific pirated recordings embodying Subject Compositions that
 24 have been reproduced and distributed by Defendants Shami Media Inc., Believe
 25 Digital, and Google without authorization. These Defendants have willfully
 26 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
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1 Compositions by the methods identified in Exhibit B-99 (or have authorized such
2 activity) without obtaining authorization to do so.

3 **One Hundredth Claim – Copyright Infringement**
4 **Against Wnts, Believe Digital, and Google**

5 351. Plaintiffs repeat each and every allegation of the Complaint.

6 352. As a separate specific course of infringement, Defendants Wnts,
7 Believe Digital, and Google have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-100. Exhibit B-100 sets forth a
10 non-exhaustive list of specific pirated recordings embodying Subject Compositions
11 that have been reproduced and distributed by Defendants Wnts, Believe Digital, and
12 Google without authorization. These Defendants have willfully infringed, and are
13 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
14 methods identified in Exhibit B-100 (or have authorized such activity) without
15 obtaining authorization to do so.

16 **One Hundred First Claim – Copyright Infringement**
17 **Against Ideal Music, Ingrooves, and Google**

18 353. Plaintiffs repeat each and every allegation of the Complaint.

19 354. As a separate specific course of infringement, Defendants Ideal Music,
20 Ingrooves, and Google have unlawfully reproduced and distributed unauthorized
21 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
22 recordings identified in Exhibit B-101. Exhibit B-101 sets forth a non-exhaustive list
23 of specific pirated recordings embodying Subject Compositions that have been
24 reproduced and distributed by Defendants Ideal Music, Ingrooves, and Google
25 without authorization. These Defendants have willfully infringed, and are
26 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
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1 methods identified in Exhibit B-101 (or have authorized such activity) without
2 obtaining authorization to do so.

3 **One Hundred Second Claim – Copyright Infringement**
4 **Against J. Joes J. Edizioni Musicali, Believe Digital, and Google**

5 355. Plaintiffs repeat each and every allegation of the Complaint.

6 356. As a separate specific course of infringement, Defendants J. Joes J.
7 Edizioni Musicali, Believe Digital, and Google have unlawfully reproduced and
8 distributed unauthorized recordings of Plaintiffs' Subject Compositions including,
9 but not limited to, the recordings identified in Exhibit B-102. Exhibit B-102 sets
10 forth a non-exhaustive list of specific pirated recordings embodying Subject
11 Compositions that have been reproduced and distributed by Defendants J. Joes J.
12 Edizioni Musicali, Believe Digital, and Google without authorization. These
13 Defendants have willfully infringed, and are continuing to infringe, Plaintiffs'
14 copyrights in the Subject Compositions by the methods identified in Exhibit B-102
15 (or have authorized such activity) without obtaining authorization to do so.

16 **One Hundred Third Claim – Copyright Infringement**
17 **Against Reloaded Music, Ingrooves, and Google**

18 357. Plaintiffs repeat each and every allegation of the Complaint.

19 358. As a separate specific course of infringement, Defendants Reloaded
20 Music, Ingrooves, and Google have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-103. Exhibit B-103 sets forth a
23 non-exhaustive list of specific pirated recordings embodying Subject Compositions
24 that have been reproduced and distributed by Defendants Reloaded Music,
25 Ingrooves, and Google without authorization. These Defendants have willfully
26 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
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1 Compositions by the methods identified in Exhibit B-103 (or have authorized such
2 activity) without obtaining authorization to do so.

3 **One Hundred Fourth Claim – Copyright Infringement**
4 **Against TVP, Inc., Orchard, and Google**

5 359. Plaintiffs repeat each and every allegation of the Complaint.

6 360. As a separate specific course of infringement, Defendants TVP, Inc.,
7 Orchard, and Google have unlawfully reproduced and distributed unauthorized
8 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
9 recordings identified in Exhibit B-104. Exhibit B-104 sets forth a non-exhaustive list
10 of specific pirated recordings embodying Subject Compositions that have been
11 reproduced and distributed by Defendants TVP, Inc., Orchard, and Google without
12 authorization. These Defendants have willfully infringed, and are continuing to
13 infringe, Plaintiffs' copyrights in the Subject Compositions by the methods
14 identified in Exhibit B-104 (or have authorized such activity) without obtaining
15 authorization to do so.

16 **One Hundred Fifth Claim – Copyright Infringement**
17 **Against Best Records, Believe Digital, and Google**

18 361. Plaintiffs repeat each and every allegation of the Complaint.

19 362. As a separate specific course of infringement, Defendants Best
20 Records, Believe Digital, and Google have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-105. Exhibit B-105 sets forth a
23 non-exhaustive list of specific pirated recordings embodying Subject Compositions
24 that have been reproduced and distributed by Defendants Best Records, Believe
25 Digital, and Google without authorization. These Defendants have willfully
26 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
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1 Compositions by the methods identified in Exhibit B-105 (or have authorized such
2 activity) without obtaining authorization to do so.

3 **One Hundred Sixth Claim – Copyright Infringement**
4 **Against Werner Last's Favourites Jazz, Believe Digital, and Google**

5 363. Plaintiffs repeat each and every allegation of the Complaint.

6 364. As a separate specific course of infringement, Defendants Werner
7 Last's Favourites Jazz, Believe Digital, and Google have unlawfully reproduced and
8 distributed unauthorized recordings of Plaintiffs' Subject Compositions including,
9 but not limited to, the recordings identified in Exhibit B-106. Exhibit B-106 sets
10 forth a non-exhaustive list of specific pirated recordings embodying Subject
11 Compositions that have been reproduced and distributed by Defendants Werner
12 Last's Favourites Jazz, Believe Digital, and Google without authorization. These
13 Defendants have willfully infringed, and are continuing to infringe, Plaintiffs'
14 copyrights in the Subject Compositions by the methods identified in Exhibit B-106
15 (or have authorized such activity) without obtaining authorization to do so.

16 **One Hundred Seventh Claim – Copyright Infringement**
17 **Against Blue Sounds, Orchard, and Google**

18 365. Plaintiffs repeat each and every allegation of the Complaint.

19 366. As a separate specific course of infringement, Defendants Blue Sounds,
20 Orchard, and Google have unlawfully reproduced and distributed unauthorized
21 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
22 recordings identified in Exhibit B-107. Exhibit B-107 sets forth a non-exhaustive list
23 of specific pirated recordings embodying Subject Compositions that have been
24 reproduced and distributed by Defendants Blue Sounds, Orchard, and Google
25 without authorization. These Defendants have willfully infringed, and are
26 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
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1 methods identified in Exhibit B-107 (or have authorized such activity) without
2 obtaining authorization to do so.

3 **One Hundred Eighth Claim – Copyright Infringement**
4 **Against Broken Audio, Ingrooves, and Google**

5 367. Plaintiffs repeat each and every allegation of the Complaint.

6 368. As a separate specific course of infringement, Defendants Broken
7 Audio, Ingrooves, and Google have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-108. Exhibit B-108 sets forth a
10 non-exhaustive list of specific pirated recordings embodying Subject Compositions
11 that have been reproduced and distributed by Defendants Broken Audio, Ingrooves,
12 and Google without authorization. These Defendants have willfully infringed, and
13 are continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
14 methods identified in Exhibit B-108 (or have authorized such activity) without
15 obtaining authorization to do so.

16 **One Hundred Ninth Claim – Copyright Infringement**
17 **Against Acrobat Music Ltd., Orchard, and Google**

18 369. Plaintiffs repeat each and every allegation of the Complaint.

19 370. As a separate specific course of infringement, Defendants Acrobat
20 Music Ltd., Orchard, and Google have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-109. Exhibit B-109 sets forth a
23 non-exhaustive list of specific pirated recordings embodying Subject Compositions
24 that have been reproduced and distributed by Defendants Acrobat Music Ltd.,
25 Orchard, and Google without authorization. These Defendants have willfully
26 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
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1 Compositions by the methods identified in Exhibit B-109 (or have authorized such
2 activity) without obtaining authorization to do so.

3 **One Hundred Tenth Claim – Copyright Infringement**
4 **Against CTS Digital, State51, and Google**

5 371. Plaintiffs repeat each and every allegation of the Complaint.

6 372. As a separate specific course of infringement, Defendants CTS Digital,
7 State51, and Google have unlawfully reproduced and distributed unauthorized
8 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
9 recordings identified in Exhibit B-110. Exhibit B-110 sets forth a non-exhaustive list
10 of specific pirated recordings embodying Subject Compositions that have been
11 reproduced and distributed by Defendants CTS Digital, State51, and Google without
12 authorization. These Defendants have willfully infringed, and are continuing to
13 infringe, Plaintiffs' copyrights in the Subject Compositions by the methods
14 identified in Exhibit B-110 (or have authorized such activity) without obtaining
15 authorization to do so.

16 **One Hundred Eleventh Claim – Copyright Infringement**
17 **Against DWK Records, Ingrooves, and Google**

18 373. Plaintiffs repeat each and every allegation of the Complaint.

19 374. As a separate specific course of infringement, Defendants DWK
20 Records, Ingrooves, and Google have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-111. Exhibit B-111 sets forth a
23 non-exhaustive list of specific pirated recordings embodying Subject Compositions
24 that have been reproduced and distributed by Defendants DWK Records, Ingrooves,
25 and Google without authorization. These Defendants have willfully infringed, and
26 are continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
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1 methods identified in Exhibit B-111 (or have authorized such activity) without
2 obtaining authorization to do so.

3 **One Hundred Twelfth Claim – Copyright Infringement**
4 **Against SendDigital, "John Doe" Distributor, and Google**

5 375. Plaintiffs repeat each and every allegation of the Complaint.

6 376. As a separate specific course of infringement, Defendants SendDigital,
7 "John Doe" Distributor, and Google have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-112. Exhibit B-112 sets forth a
10 non-exhaustive list of specific pirated recordings embodying Subject Compositions
11 that have been reproduced and distributed by Defendants SendDigital, "John Doe"
12 Distributor, and Google without authorization. These Defendants have willfully
13 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
14 Compositions by the methods identified in Exhibit B-112 (or have authorized such
15 activity) without obtaining authorization to do so.

16 **One Hundred Thirteenth Claim – Copyright Infringement**
17 **Against Future Noise Music Limited, Orchard, and Google**

18 377. Plaintiffs repeat each and every allegation of the Complaint.

19 378. As a separate specific course of infringement, Defendants Future Noise
20 Music Limited, Orchard, and Google have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-113. Exhibit B-113 sets forth a
23 non-exhaustive list of specific pirated recordings embodying Subject Compositions
24 that have been reproduced and distributed by Defendants Future Noise Music
25 Limited, Orchard, and Google without authorization. These Defendants have
26 willfully infringed, and are continuing to infringe, Plaintiffs' copyrights in the
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1 Subject Compositions by the methods identified in Exhibit B-113 (or have
2 authorized such activity) without obtaining authorization to do so.

3 **One Hundred Fourteenth Claim – Copyright Infringement**
4 **Against Jazzsential, Ingrooves, and Google**

5 379. Plaintiffs repeat each and every allegation of the Complaint.

6 380. As a separate specific course of infringement, Defendants Jazzsential,
7 Ingrooves, and Google have unlawfully reproduced and distributed unauthorized
8 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
9 recordings identified in Exhibit B-114. Exhibit B-114 sets forth a non-exhaustive list
10 of specific pirated recordings embodying Subject Compositions that have been
11 reproduced and distributed by Defendants Jazzsential, Ingrooves, and Google
12 without authorization. These Defendants have willfully infringed, and are
13 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
14 methods identified in Exhibit B-114 (or have authorized such activity) without
15 obtaining authorization to do so.

16 **One Hundred Fifteenth Claim – Copyright Infringement**
17 **Against Primephonic USA Inc., Naxos of America, and Google**

18 381. Plaintiffs repeat each and every allegation of the Complaint.

19 382. As a separate specific course of infringement, Defendants Primephonic
20 USA Inc., Naxos of America, and Google have unlawfully reproduced and
21 distributed unauthorized recordings of Plaintiffs' Subject Compositions including,
22 but not limited to, the recordings identified in Exhibit B-115. Exhibit B-115 sets
23 forth a non-exhaustive list of specific pirated recordings embodying Subject
24 Compositions that have been reproduced and distributed by Defendants
25 Primephonic USA Inc., Naxos of America, and Google without authorization. These
26 Defendants have willfully infringed, and are continuing to infringe, Plaintiffs'

1 copyrights in the Subject Compositions by the methods identified in Exhibit B-115
 2 (or have authorized such activity) without obtaining authorization to do so.

3 **One Hundred Sixteenth Claim – Copyright Infringement**
 4 **Against Entertain Me Ltd., Orchard, and Google**

5 383. Plaintiffs repeat each and every allegation of the Complaint.

6 384. As a separate specific course of infringement, Defendants Entertain Me
 7 Ltd., Orchard, and Google have unlawfully reproduced and distributed unauthorized
 8 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
 9 recordings identified in Exhibit B-116. Exhibit B-116 sets forth a non-exhaustive list
 10 of specific pirated recordings embodying Subject Compositions that have been
 11 reproduced and distributed by Defendants Entertain Me Ltd., Orchard, and Google
 12 without authorization. These Defendants have willfully infringed, and are
 13 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
 14 methods identified in Exhibit B-116 (or have authorized such activity) without
 15 obtaining authorization to do so.

16 **One Hundred Seventeenth Claim – Copyright Infringement**
 17 **Against Vintage Music SL, Orchard, and Google**

18 385. Plaintiffs repeat each and every allegation of the Complaint.

19 386. As a separate specific course of infringement, Defendants Vintage
 20 Music SL, Orchard, and Google have unlawfully reproduced and distributed
 21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
 22 limited to, the recordings identified in Exhibit B-117. Exhibit B-117 sets forth a
 23 non-exhaustive list of specific pirated recordings embodying Subject Compositions
 24 that have been reproduced and distributed by Defendants Vintage Music SL,
 25 Orchard, and Google without authorization. These Defendants have willfully
 26 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
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1 Compositions by the methods identified in Exhibit B-117 (or have authorized such
2 activity) without obtaining authorization to do so.

3 **One Hundred Eighteenth Claim – Copyright Infringement**
4 **Against Jazz Co., Orchard, and Google**

5 387. Plaintiffs repeat each and every allegation of the Complaint.

6 388. As a separate specific course of infringement, Defendants Jazz Co.,
7 Orchard, and Google have unlawfully reproduced and distributed unauthorized
8 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
9 recordings identified in Exhibit B-118. Exhibit B-118 sets forth a non-exhaustive list
10 of specific pirated recordings embodying Subject Compositions that have been
11 reproduced and distributed by Defendants Jazz Co., Orchard, and Google without
12 authorization. These Defendants have willfully infringed, and are continuing to
13 infringe, Plaintiffs' copyrights in the Subject Compositions by the methods
14 identified in Exhibit B-118 (or have authorized such activity) without obtaining
15 authorization to do so.

16 **One Hundred Nineteenth Claim – Copyright Infringement**
17 **Against Mach60 Music, State51, and Google**

18 389. Plaintiffs repeat each and every allegation of the Complaint.

19 390. As a separate specific course of infringement, Defendants Mach60
20 Music, State51, and Google have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-119. Exhibit B-119 sets forth a
23 non-exhaustive list of specific pirated recordings embodying Subject Compositions
24 that have been reproduced and distributed by Defendants Mach60 Music, State51,
25 and Google without authorization. These Defendants have willfully infringed, and
26 are continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
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1 methods identified in Exhibit B-119 (or have authorized such activity) without
2 obtaining authorization to do so.

3 **One Hundred Twentieth Claim – Copyright Infringement**
4 **Against Vintage Records, Orchard, and Google**

5 391. Plaintiffs repeat each and every allegation of the Complaint.

6 392. As a separate specific course of infringement, Defendants Vintage
7 Records, Orchard, and Google have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-120. Exhibit B-120 sets forth a
10 non-exhaustive list of specific pirated recordings embodying Subject Compositions
11 that have been reproduced and distributed by Defendants Vintage Records, Orchard,
12 and Google without authorization. These Defendants have willfully infringed, and
13 are continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
14 methods identified in Exhibit B-120 (or have authorized such activity) without
15 obtaining authorization to do so.

16 **One Hundred Twenty-First Claim – Copyright Infringement**
17 **Against ROBA Music Verlag GmbH, Believe Digital, and Google**

18 393. Plaintiffs repeat each and every allegation of the Complaint.

19 394. As a separate specific course of infringement, Defendants ROBA
20 Music Verlag GmbH, Believe Digital, and Google have unlawfully reproduced and
21 distributed unauthorized recordings of Plaintiffs' Subject Compositions including,
22 but not limited to, the recordings identified in Exhibit B-121. Exhibit B-121 sets
23 forth a non-exhaustive list of specific pirated recordings embodying Subject
24 Compositions that have been reproduced and distributed by Defendants ROBA
25 Music Verlag GmbH, Believe Digital, and Google without authorization. These
26 Defendants have willfully infringed, and are continuing to infringe, Plaintiffs'

1 copyrights in the Subject Compositions by the methods identified in Exhibit B-121
2 (or have authorized such activity) without obtaining authorization to do so.

3 **One Hundred Twenty-Second Claim – Copyright Infringement**
4 **Against OVC Media, "John Doe" Distributor, and Google**

5 395. Plaintiffs repeat each and every allegation of the Complaint.

6 396. As a separate specific course of infringement, Defendants OVC Media,
7 "John Doe" Distributor, and Google have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-122. Exhibit B-122 sets forth a
10 non-exhaustive list of specific pirated recordings embodying Subject Compositions
11 that have been reproduced and distributed by Defendants OVC Media, "John Doe"
12 Distributor, and Google without authorization. These Defendants have willfully
13 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
14 Compositions by the methods identified in Exhibit B-122 (or have authorized such
15 activity) without obtaining authorization to do so.

16 **One Hundred Twenty-Third Claim – Copyright Infringement**
17 **Against Plenty Jazz Records, Orchard, and Google**

18 397. Plaintiffs repeat each and every allegation of the Complaint.

19 398. As a separate specific course of infringement, Defendants Plenty Jazz
20 Records, Orchard, and Google have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-123. Exhibit B-123 sets forth a
23 non-exhaustive list of specific pirated recordings embodying Subject Compositions
24 that have been reproduced and distributed by Defendants Plenty Jazz Records,
25 Orchard, and Google without authorization. These Defendants have willfully
26 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
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1 Compositions by the methods identified in Exhibit B-123 (or have authorized such
2 activity) without obtaining authorization to do so.

3 **One Hundred Twenty-Fourth Claim – Copyright Infringement**
4 **Against Impressions, Orchard, and Google**

5 399. Plaintiffs repeat each and every allegation of the Complaint.

6 400. As a separate specific course of infringement, Defendants Impressions,
7 Orchard, and Google have unlawfully reproduced and distributed unauthorized
8 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
9 recordings identified in Exhibit B-124. Exhibit B-124 sets forth a non-exhaustive list
10 of specific pirated recordings embodying Subject Compositions that have been
11 reproduced and distributed by Defendants Impressions, Orchard, and Google
12 without authorization. These Defendants have willfully infringed, and are
13 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
14 methods identified in Exhibit B-124 (or have authorized such activity) without
15 obtaining authorization to do so.

16 **One Hundred Twenty-Fifth Claim – Copyright Infringement**
17 **Against Move, Phonofile, and Google**

18 401. Plaintiffs repeat each and every allegation of the Complaint.

19 402. As a separate specific course of infringement, Defendants Move,
20 Phonofile, and Google have unlawfully reproduced and distributed unauthorized
21 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
22 recordings identified in Exhibit B-125. Exhibit B-125 sets forth a non-exhaustive list
23 of specific pirated recordings embodying Subject Compositions that have been
24 reproduced and distributed by Defendants Move, Phonofile, and Google without
25 authorization. These Defendants have willfully infringed, and are continuing to
26 infringe, Plaintiffs' copyrights in the Subject Compositions by the methods
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1 identified in Exhibit B-125 (or have authorized such activity) without obtaining
2 authorization to do so.

3 **One Hundred Twenty-Sixth Claim – Copyright Infringement**
4 **Against Favorite Classics, Believe Digital, and Google**

5 403. Plaintiffs repeat each and every allegation of the Complaint.

6 404. As a separate specific course of infringement, Defendants Favorite
7 Classics, Believe Digital, and Google have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-126. Exhibit B-126 sets forth a
10 non-exhaustive list of specific pirated recordings embodying Subject Compositions
11 that have been reproduced and distributed by Defendants Favorite Classics, Believe
12 Digital, and Google without authorization. These Defendants have willfully
13 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
14 Compositions by the methods identified in Exhibit B-126 (or have authorized such
15 activity) without obtaining authorization to do so.

16 **One Hundred Twenty-Seventh Claim – Copyright Infringement**
17 **Against Jazz Moon, Orchard, and Google**

18 405. Plaintiffs repeat each and every allegation of the Complaint.

19 406. As a separate specific course of infringement, Defendants Jazz Moon,
20 Orchard, and Google have unlawfully reproduced and distributed unauthorized
21 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
22 recordings identified in Exhibit B-127. Exhibit B-127 sets forth a non-exhaustive list
23 of specific pirated recordings embodying Subject Compositions that have been
24 reproduced and distributed by Defendants Jazz Moon, Orchard, and Google without
25 authorization. These Defendants have willfully infringed, and are continuing to
26 infringe, Plaintiffs' copyrights in the Subject Compositions by the methods
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1 identified in Exhibit B-127 (or have authorized such activity) without obtaining
2 authorization to do so.

3 **One Hundred Twenty-Eighth Claim – Copyright Infringement**
4 **Against Gralin Music, Ingrooves, and Google**

5 407. Plaintiffs repeat each and every allegation of the Complaint.

6 408. As a separate specific course of infringement, Defendants Gralin
7 Music, Ingrooves, and Google have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-128. Exhibit B-128 sets forth a
10 non-exhaustive list of specific pirated recordings embodying Subject Compositions
11 that have been reproduced and distributed by Defendants Gralin Music, Ingrooves,
12 and Google without authorization. These Defendants have willfully infringed, and
13 are continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
14 methods identified in Exhibit B-128 (or have authorized such activity) without
15 obtaining authorization to do so.

16 **One Hundred Twenty-Ninth Claim – Copyright Infringement**
17 **Against Triton, Orchard, and Google**

18 409. Plaintiffs repeat each and every allegation of the Complaint.

19 410. As a separate specific course of infringement, Defendants Triton,
20 Orchard, and Google have unlawfully reproduced and distributed unauthorized
21 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
22 recordings identified in Exhibit B-129. Exhibit B-129 sets forth a non-exhaustive list
23 of specific pirated recordings embodying Subject Compositions that have been
24 reproduced and distributed by Defendants Triton, Orchard, and Google without
25 authorization. These Defendants have willfully infringed, and are continuing to
26 infringe, Plaintiffs' copyrights in the Subject Compositions by the methods
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1 identified in Exhibit B-129 (or have authorized such activity) without obtaining
2 authorization to do so.

3 **One Hundred Thirtieth Claim – Copyright Infringement**
4 **Against Avid Group, Orchard, and Google**

5 411. Plaintiffs repeat each and every allegation of the Complaint.

6 412. As a separate specific course of infringement, Defendants Avid Group,
7 Orchard, and Google have unlawfully reproduced and distributed unauthorized
8 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
9 recordings identified in Exhibit B-130. Exhibit B-130 sets forth a non-exhaustive list
10 of specific pirated recordings embodying Subject Compositions that have been
11 reproduced and distributed by Defendants Avid Group, Orchard, and Google
12 without authorization. These Defendants have willfully infringed, and are
13 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
14 methods identified in Exhibit B-130 (or have authorized such activity) without
15 obtaining authorization to do so.

16 **One Hundred Thirty-First Claim – Copyright Infringement**
17 **Against Henry Hadaway Organization Limited, Orchard, and Google**

18 413. Plaintiffs repeat each and every allegation of the Complaint.

19 414. As a separate specific course of infringement, Defendants Henry
20 Hadaway Organization Limited, Orchard, and Google have unlawfully reproduced
21 and distributed unauthorized recordings of Plaintiffs' Subject Compositions
22 including, but not limited to, the recordings identified in Exhibit B-131. Exhibit B-
23 131 sets forth a non-exhaustive list of specific pirated recordings embodying Subject
24 Compositions that have been reproduced and distributed by Defendants Henry
25 Hadaway Organization Limited, Orchard, and Google without authorization. These
26 Defendants have willfully infringed, and are continuing to infringe, Plaintiffs'

1 copyrights in the Subject Compositions by the methods identified in Exhibit B-131
2 (or have authorized such activity) without obtaining authorization to do so.

3 **One Hundred Thirty-Second Claim – Copyright Infringement**
4 **Against Railroad, Orchard, and Google**

5 415. Plaintiffs repeat each and every allegation of the Complaint.

6 416. As a separate specific course of infringement, Defendants Railroad,
7 Orchard, and Google have unlawfully reproduced and distributed unauthorized
8 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
9 recordings identified in Exhibit B-132. Exhibit B-132 sets forth a non-exhaustive list
10 of specific pirated recordings embodying Subject Compositions that have been
11 reproduced and distributed by Defendants Railroad, Orchard, and Google without
12 authorization. These Defendants have willfully infringed, and are continuing to
13 infringe, Plaintiffs' copyrights in the Subject Compositions by the methods
14 identified in Exhibit B-132 (or have authorized such activity) without obtaining
15 authorization to do so.

16 **One Hundred Thirty-Third Claim – Copyright Infringement**
17 **Against AP Music Ltd, "John Doe" Distributor, and Google**

18 417. Plaintiffs repeat each and every allegation of the Complaint.

19 418. As a separate specific course of infringement, Defendants AP Music
20 Ltd, "John Doe" Distributor, and Google have unlawfully reproduced and
21 distributed unauthorized recordings of Plaintiffs' Subject Compositions including,
22 but not limited to, the recordings identified in Exhibit B-133. Exhibit B-133 sets
23 forth a non-exhaustive list of specific pirated recordings embodying Subject
24 Compositions that have been reproduced and distributed by Defendants AP Music
25 Ltd, "John Doe" Distributor, and Google without authorization. These Defendants
26 have willfully infringed, and are continuing to infringe, Plaintiffs' copyrights in the

1 Subject Compositions by the methods identified in Exhibit B-133 (or have
2 authorized such activity) without obtaining authorization to do so.

3 **One Hundred Thirty-Fourth Claim – Copyright Infringement**
4 **Against Lionfish Music, Believe Digital, and Google**

5 419. Plaintiffs repeat each and every allegation of the Complaint.

6 420. As a separate specific course of infringement, Defendants Lionfish
7 Music, Believe Digital, and Google have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-134. Exhibit B-134 sets forth a
10 non-exhaustive list of specific pirated recordings embodying Subject Compositions
11 that have been reproduced and distributed by Defendants Lionfish Music, Believe
12 Digital, and Google without authorization. These Defendants have willfully
13 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
14 Compositions by the methods identified in Exhibit B-134 (or have authorized such
15 activity) without obtaining authorization to do so.

16 **One Hundred Thirty-Fifth Claim – Copyright Infringement**
17 **Against Pink Dot, "John Doe" Distributor, and Google**

18 421. Plaintiffs repeat each and every allegation of the Complaint.

19 422. As a separate specific course of infringement, Defendants Pink Dot,
20 "John Doe" Distributor, and Google have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-135. Exhibit B-135 sets forth a
23 non-exhaustive list of specific pirated recordings embodying Subject Compositions
24 that have been reproduced and distributed by Defendants Pink Dot, "John Doe"
25 Distributor, and Google without authorization. These Defendants have willfully
26 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
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1 Compositions by the methods identified in Exhibit B-135 (or have authorized such
2 activity) without obtaining authorization to do so.

3 **One Hundred Thirty-Sixth Claim – Copyright Infringement**
4 **Against Historical Jazz, Orchard, and Google**

5 423. Plaintiffs repeat each and every allegation of the Complaint.

6 424. As a separate specific course of infringement, Defendants Historical
7 Jazz, Orchard, and Google have unlawfully reproduced and distributed unauthorized
8 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
9 recordings identified in Exhibit B-136. Exhibit B-136 sets forth a non-exhaustive list
10 of specific pirated recordings embodying Subject Compositions that have been
11 reproduced and distributed by Defendants Historical Jazz, Orchard, and Google
12 without authorization. These Defendants have willfully infringed, and are
13 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
14 methods identified in Exhibit B-136 (or have authorized such activity) without
15 obtaining authorization to do so.

16 **One Hundred Thirty-Seventh Claim – Copyright Infringement**
17 **Against Classics, "John Doe" Distributor, and Google**

18 425. Plaintiffs repeat each and every allegation of the Complaint.

19 426. As a separate specific course of infringement, Defendants Classics,
20 "John Doe" Distributor, and Google have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-137. Exhibit B-137 sets forth a
23 non-exhaustive list of specific pirated recordings embodying Subject Compositions
24 that have been reproduced and distributed by Defendants Classics, "John Doe"
25 Distributor, and Google without authorization. These Defendants have willfully
26 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
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1 Compositions by the methods identified in Exhibit B-137 (or have authorized such
2 activity) without obtaining authorization to do so.

3 **One Hundred Thirty-Eighth Claim – Copyright Infringement**
4 **Against Brisa Records, Orchard, and Google**

5 427. Plaintiffs repeat each and every allegation of the Complaint.

6 428. As a separate specific course of infringement, Defendants Brisa
7 Records, Orchard, and Google have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-138. Exhibit B-138 sets forth a
10 non-exhaustive list of specific pirated recordings embodying Subject Compositions
11 that have been reproduced and distributed by Defendants Brisa Records, Orchard,
12 and Google without authorization. These Defendants have willfully infringed, and
13 are continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
14 methods identified in Exhibit B-138 (or have authorized such activity) without
15 obtaining authorization to do so.

16 **One Hundred Thirty-Ninth Claim – Copyright Infringement**
17 **Against Cherished Records, Ingrooves, and Google**

18 429. Plaintiffs repeat each and every allegation of the Complaint.

19 430. As a separate specific course of infringement, Defendants Cherished
20 Records, Ingrooves, and Google have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-139. Exhibit B-139 sets forth a
23 non-exhaustive list of specific pirated recordings embodying Subject Compositions
24 that have been reproduced and distributed by Defendants Cherished Records,
25 Ingrooves, and Google without authorization. These Defendants have willfully
26 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
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1 Compositions by the methods identified in Exhibit B-139 (or have authorized such
2 activity) without obtaining authorization to do so.

3 **One Hundred Fortieth Claim – Copyright Infringement**
4 **Against Rarity Music, Believe Digital, and Google**

5 431. Plaintiffs repeat each and every allegation of the Complaint.

6 432. As a separate specific course of infringement, Defendants Rarity
7 Music, Believe Digital, and Google have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-140. Exhibit B-140 sets forth a
10 non-exhaustive list of specific pirated recordings embodying Subject Compositions
11 that have been reproduced and distributed by Defendants Rarity Music, Believe
12 Digital, and Google without authorization. These Defendants have willfully
13 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
14 Compositions by the methods identified in Exhibit B-140 (or have authorized such
15 activity) without obtaining authorization to do so.

16 **One Hundred Forty-First Claim – Copyright Infringement**
17 **Against Michael Bennett, Ingrooves, and Google**

18 433. Plaintiffs repeat each and every allegation of the Complaint.

19 434. As a separate specific course of infringement, Defendants Michael
20 Bennett, Ingrooves, and Google have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-141. Exhibit B-141 sets forth a
23 non-exhaustive list of specific pirated recordings embodying Subject Compositions
24 that have been reproduced and distributed by Defendants Michael Bennett,
25 Ingrooves, and Google without authorization. These Defendants have willfully
26 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
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1 Compositions by the methods identified in Exhibit B-141 (or have authorized such
2 activity) without obtaining authorization to do so.

3 **One Hundred Forty-Second Claim – Copyright Infringement**
4 **Against Digital Gramophone, Orchard, and Google**

5 435. Plaintiffs repeat each and every allegation of the Complaint.

6 436. As a separate specific course of infringement, Defendants Digital
7 Gramophone, Orchard, and Google have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-142. Exhibit B-142 sets forth a
10 non-exhaustive list of specific pirated recordings embodying Subject Compositions
11 that have been reproduced and distributed by Defendants Digital Gramophone,
12 Orchard, and Google without authorization. These Defendants have willfully
13 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
14 Compositions by the methods identified in Exhibit B-142 (or have authorized such
15 activity) without obtaining authorization to do so.

16 **One Hundred Forty-Third Claim – Copyright Infringement**
17 **Against Blaricum C.D. Company (B.C.D.) BV, Orchard, and Google**

18 437. Plaintiffs repeat each and every allegation of the Complaint.

19 438. As a separate specific course of infringement, Defendants Blaricum
20 C.D. Company (B.C.D.) BV, Orchard, and Google have unlawfully reproduced and
21 distributed unauthorized recordings of Plaintiffs' Subject Compositions including,
22 but not limited to, the recordings identified in Exhibit B-143. Exhibit B-143 sets
23 forth a non-exhaustive list of specific pirated recordings embodying Subject
24 Compositions that have been reproduced and distributed by Defendants Blaricum
25 C.D. Company (B.C.D.) BV, Orchard, and Google without authorization. These
26 Defendants have willfully infringed, and are continuing to infringe, Plaintiffs'

1 copyrights in the Subject Compositions by the methods identified in Exhibit B-143
 2 (or have authorized such activity) without obtaining authorization to do so.

3 **One Hundred Forty-Fourth Claim – Copyright Infringement**
 4 **Against Plaza Mayor Company Limited, Orchard, and Google**

5 439. Plaintiffs repeat each and every allegation of the Complaint.

6 440. As a separate specific course of infringement, Defendants Plaza Mayor
 7 Company Limited, Orchard, and Google have unlawfully reproduced and distributed
 8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
 9 limited to, the recordings identified in Exhibit B-144. Exhibit B-144 sets forth a
 10 non-exhaustive list of specific pirated recordings embodying Subject Compositions
 11 that have been reproduced and distributed by Defendants Plaza Mayor Company
 12 Limited, Orchard, and Google without authorization. These Defendants have
 13 willfully infringed, and are continuing to infringe, Plaintiffs' copyrights in the
 14 Subject Compositions by the methods identified in Exhibit B-144 (or have
 15 authorized such activity) without obtaining authorization to do so.

16 **One Hundred Forty-Fifth Claim – Copyright Infringement**
 17 **Against Cleopatra Records, Inc., Orchard, and Microsoft**

18 441. Plaintiffs repeat each and every allegation of the Complaint.

19 442. As a separate specific course of infringement, Defendants Cleopatra
 20 Records, Inc., Orchard, and Microsoft have unlawfully reproduced and distributed
 21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
 22 limited to, the recordings identified in Exhibit B-145. Exhibit B-145 sets forth a
 23 non-exhaustive list of specific pirated recordings embodying Subject Compositions
 24 that have been reproduced and distributed by Defendants Cleopatra Records, Inc.,
 25 Orchard, and Microsoft without authorization. These Defendants have willfully
 26 infringed Plaintiffs' copyrights in the Subject Compositions by the methods
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1 identified in Exhibit B-145 (or have authorized such activity) without obtaining
2 authorization to do so.

3 **One Hundred Forty-Sixth Claim – Copyright Infringement**
4 **Against Pickwick Group Limited, Orchard, and Microsoft**

5 443. Plaintiffs repeat each and every allegation of the Complaint.

6 444. As a separate specific course of infringement, Defendants Pickwick
7 Group Limited, Orchard, and Microsoft have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-146. Exhibit B-146 sets forth a
10 non-exhaustive list of specific pirated recordings embodying Subject Compositions
11 that have been reproduced and distributed by Defendants Pickwick Group Limited,
12 Orchard, and Microsoft without authorization. These Defendants have willfully
13 infringed Plaintiffs' copyrights in the Subject Compositions by the methods
14 identified in Exhibit B-146 (or have authorized such activity) without obtaining
15 authorization to do so.

16 **One Hundred Forty-Seventh Claim – Copyright Infringement**
17 **Against Thomas Colley, Believe Digital, and Microsoft**

18 445. Plaintiffs repeat each and every allegation of the Complaint.

19 446. As a separate specific course of infringement, Defendants Thomas
20 Colley, Believe Digital, and Microsoft have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-147. Exhibit B-147 sets forth a
23 non-exhaustive list of specific pirated recordings embodying Subject Compositions
24 that have been reproduced and distributed by Defendants Thomas Colley, Believe
25 Digital, and Microsoft without authorization. These Defendants have willfully
26 infringed Plaintiffs' copyrights in the Subject Compositions by the methods
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1 identified in Exhibit B-147 (or have authorized such activity) without obtaining
2 authorization to do so.

3 **One Hundred Forty-Eighth Claim – Copyright Infringement**
4 **Against Shami Media Inc., Believe Digital, and Microsoft**

5 447. Plaintiffs repeat each and every allegation of the Complaint.

6 448. As a separate specific course of infringement, Defendants Shami Media
7 Inc., Believe Digital, and Microsoft have unlawfully reproduced and distributed
8 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
9 limited to, the recordings identified in Exhibit B-148. Exhibit B-148 sets forth a
10 non-exhaustive list of specific pirated recordings embodying Subject Compositions
11 that have been reproduced and distributed by Defendants Shami Media Inc., Believe
12 Digital, and Microsoft without authorization. These Defendants have willfully
13 infringed Plaintiffs' copyrights in the Subject Compositions by the methods
14 identified in Exhibit B-148 (or have authorized such activity) without obtaining
15 authorization to do so.

16 **One Hundred Forty-Ninth Claim – Copyright Infringement**
17 **Against Wnts, Believe Digital, and Microsoft**

18 449. Plaintiffs repeat each and every allegation of the Complaint.

19 450. As a separate specific course of infringement, Defendants Wnts,
20 Believe Digital, and Microsoft have unlawfully reproduced and distributed
21 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
22 limited to, the recordings identified in Exhibit B-149. Exhibit B-149 sets forth a
23 non-exhaustive list of specific pirated recordings embodying Subject Compositions
24 that have been reproduced and distributed by Defendants Wnts, Believe Digital, and
25 Microsoft without authorization. These Defendants have willfully infringed
26 Plaintiffs' copyrights in the Subject Compositions by the methods identified in
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1 Exhibit B-149 (or have authorized such activity) without obtaining authorization to
2 do so.

3 **One Hundred Fiftieth Claim – Copyright Infringement**
4 **Against Ideal Music, Ingrooves, and Microsoft**

5 451. Plaintiffs repeat each and every allegation of the Complaint.

6 452. As a separate specific course of infringement, Defendants Ideal Music,
7 Ingrooves, and Microsoft have unlawfully reproduced and distributed unauthorized
8 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
9 recordings identified in Exhibit B-150. Exhibit B-150 sets forth a non-exhaustive list
10 of specific pirated recordings embodying Subject Compositions that have been
11 reproduced and distributed by Defendants Ideal Music, Ingrooves, and Microsoft
12 without authorization. These Defendants have willfully infringed Plaintiffs'
13 copyrights in the Subject Compositions by the methods identified in Exhibit B-150
14 (or have authorized such activity) without obtaining authorization to do so.

15 **One Hundred Fifty-First Claim – Copyright Infringement**
16 **Against Cugate Ltd., Believe Digital, and Microsoft**

17 453. Plaintiffs repeat each and every allegation of the Complaint.

18 454. As a separate specific course of infringement, Defendants Cugate Ltd.,
19 Believe Digital, and Microsoft have unlawfully reproduced and distributed
20 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
21 limited to, the recordings identified in Exhibit B-151. Exhibit B-151 sets forth a
22 non-exhaustive list of specific pirated recordings embodying Subject Compositions
23 that have been reproduced and distributed by Defendants Cugate Ltd., Believe
24 Digital, and Microsoft without authorization. These Defendants have willfully
25 infringed Plaintiffs' copyrights in the Subject Compositions by the methods
26 identified in Exhibit B-151 (or have authorized such activity) without obtaining
27 authorization to do so.

1 **One Hundred Fifty-Second Claim – Copyright Infringement**
 2 **Against J. Joes J. Edizioni Musicali, Believe Digital, and Microsoft**

3 455. Plaintiffs repeat each and every allegation of the Complaint.

4 456. As a separate specific course of infringement, Defendants J. Joes J.
 5 Edizioni Musicali, Believe Digital, and Microsoft have unlawfully reproduced and
 6 distributed unauthorized recordings of Plaintiffs' Subject Compositions including,
 7 but not limited to, the recordings identified in Exhibit B-152. Exhibit B-152 sets
 8 forth a non-exhaustive list of specific pirated recordings embodying Subject
 9 Compositions that have been reproduced and distributed by Defendants J. Joes J.
 10 Edizioni Musicali, Believe Digital, and Microsoft without authorization. These
 11 Defendants have willfully infringed Plaintiffs' copyrights in the Subject
 12 Compositions by the methods identified in Exhibit B-152 (or have authorized such
 13 activity) without obtaining authorization to do so.

14 **One Hundred Fifty-Third Claim – Copyright Infringement**
 15 **Against Reloaded Music, Ingrooves, and Microsoft**

16 457. Plaintiffs repeat each and every allegation of the Complaint.

17 458. As a separate specific course of infringement, Defendants Reloaded
 18 Music, Ingrooves, and Microsoft have unlawfully reproduced and distributed
 19 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
 20 limited to, the recordings identified in Exhibit B-153. Exhibit B-153 sets forth a
 21 non-exhaustive list of specific pirated recordings embodying Subject Compositions
 22 that have been reproduced and distributed by Defendants Reloaded Music,
 23 Ingrooves, and Microsoft without authorization. These Defendants have willfully
 24 infringed Plaintiffs' copyrights in the Subject Compositions by the methods
 25 identified in Exhibit B-153 (or have authorized such activity) without obtaining
 26 authorization to do so.

**One Hundred Fifty-Fourth Claim – Copyright Infringement
Against Blue Sounds, Orchard, and Microsoft**

459. Plaintiffs repeat each and every allegation of the Complaint.

460. As a separate specific course of infringement, Defendants Blue Sounds, Orchard, and Microsoft have unlawfully reproduced and distributed unauthorized recordings of Plaintiffs' Subject Compositions including, but not limited to, the recordings identified in Exhibit B-154. Exhibit B-154 sets forth a non-exhaustive list of specific pirated recordings embodying Subject Compositions that have been reproduced and distributed by Defendants Blue Sounds, Orchard, and Microsoft without authorization. These Defendants have willfully infringed Plaintiffs' copyrights in the Subject Compositions by the methods identified in Exhibit B-154 (or have authorized such activity) without obtaining authorization to do so.

**One Hundred Fifty-Fifth Claim – Copyright Infringement
Against Werner Last's Favourites Jazz, Believe Digital, and Microsoft**

461. Plaintiffs repeat each and every allegation of the Complaint.

462. As a separate specific course of infringement, Defendants Werner Last's Favourites Jazz, Believe Digital, and Microsoft have unlawfully reproduced and distributed unauthorized recordings of Plaintiffs' Subject Compositions including, but not limited to, the recordings identified in Exhibit B-155. Exhibit B-155 sets forth a non-exhaustive list of specific pirated recordings embodying Subject Compositions that have been reproduced and distributed by Defendants Werner Last's Favourites Jazz, Believe Digital, and Microsoft without authorization. These Defendants have willfully infringed Plaintiffs' copyrights in the Subject Compositions by the methods identified in Exhibit B-155 (or have authorized such activity) without obtaining authorization to do so.

1 **One Hundred Fifty-Sixth Claim – Copyright Infringement**
2 **Against Best Records, Believe Digital, and Microsoft**

3 463. Plaintiffs repeat each and every allegation of the Complaint.

4 464. As a separate specific course of infringement, Defendants Best
5 Records, Believe Digital, and Microsoft have unlawfully reproduced and distributed
6 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
7 limited to, the recordings identified in Exhibit B-156. Exhibit B-156 sets forth a
8 non-exhaustive list of specific pirated recordings embodying Subject Compositions
9 that have been reproduced and distributed by Defendants Best Records, Believe
10 Digital, and Microsoft without authorization. These Defendants have willfully
11 infringed Plaintiffs' copyrights in the Subject Compositions by the methods
12 identified in Exhibit B-156 (or have authorized such activity) without obtaining
13 authorization to do so.

14 **One Hundred Fifty-Seventh Claim – Copyright Infringement**
15 **Against AP Music Ltd, "John Doe" Distributor, and Microsoft**

16 465. Plaintiffs repeat each and every allegation of the Complaint.

17 466. As a separate specific course of infringement, Defendants AP Music
18 Ltd, "John Doe" Distributor, and Microsoft have unlawfully reproduced and
19 distributed unauthorized recordings of Plaintiffs' Subject Compositions including,
20 but not limited to, the recordings identified in Exhibit B-157. Exhibit B-157 sets
21 forth a non-exhaustive list of specific pirated recordings embodying Subject
22 Compositions that have been reproduced and distributed by Defendants AP Music
23 Ltd, "John Doe" Distributor, and Microsoft without authorization. These Defendants
24 have willfully infringed Plaintiffs' copyrights in the Subject Compositions by the
25 methods identified in Exhibit B-157 (or have authorized such activity) without
26 obtaining authorization to do so.

1 **One Hundred Fifty-Eighth Claim – Copyright Infringement**
2 **Against TVP, Inc., Orchard, and Microsoft**

3 467. Plaintiffs repeat each and every allegation of the Complaint.

4 468. As a separate specific course of infringement, Defendants TVP, Inc.,
5 Orchard, and Microsoft have unlawfully reproduced and distributed unauthorized
6 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
7 recordings identified in Exhibit B-158. Exhibit B-158 sets forth a non-exhaustive list
8 of specific pirated recordings embodying Subject Compositions that have been
9 reproduced and distributed by Defendants TVP, Inc., Orchard, and Microsoft
10 without authorization. These Defendants have willfully infringed Plaintiffs'
11 copyrights in the Subject Compositions by the methods identified in Exhibit B-158
12 (or have authorized such activity) without obtaining authorization to do so.

13 **One Hundred Fifty-Ninth Claim – Copyright Infringement**
14 **Against Broken Audio, Ingrooves, and Microsoft**

15 469. Plaintiffs repeat each and every allegation of the Complaint.

16 470. As a separate specific course of infringement, Defendants Broken
17 Audio, Ingrooves, and Microsoft have unlawfully reproduced and distributed
18 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
19 limited to, the recordings identified in Exhibit B-159. Exhibit B-159 sets forth a
20 non-exhaustive list of specific pirated recordings embodying Subject Compositions
21 that have been reproduced and distributed by Defendants Broken Audio, Ingrooves,
22 and Microsoft without authorization. These Defendants have willfully infringed
23 Plaintiffs' copyrights in the Subject Compositions by the methods identified in
24 Exhibit B-159 (or have authorized such activity) without obtaining authorization to
25 do so.

**One Hundred Sixtieth Claim – Copyright Infringement
Against Hasmick Promotions Limited, Orchard, and Microsoft**

471. Plaintiffs repeat each and every allegation of the Complaint.

472. As a separate specific course of infringement, Defendants Hasmick Promotions Limited, Orchard, and Microsoft have unlawfully reproduced and distributed unauthorized recordings of Plaintiffs' Subject Compositions including, but not limited to, the recordings identified in Exhibit B-160. Exhibit B-160 sets forth a non-exhaustive list of specific pirated recordings embodying Subject Compositions that have been reproduced and distributed by Defendants Hasmick Promotions Limited, Orchard, and Microsoft without authorization. These Defendants have willfully infringed Plaintiffs' copyrights in the Subject Compositions by the methods identified in Exhibit B-160 (or have authorized such activity) without obtaining authorization to do so.

**One Hundred Sixty-First Claim – Copyright Infringement
Against Marathon Media Int. Ltd., Second Wind Digital and Microsoft**

473. Plaintiffs repeat each and every allegation of the Complaint.

474. As a separate specific course of infringement, Defendants Marathon Media Int. Ltd., Second Wind Digital and Microsoft have unlawfully reproduced and distributed unauthorized recordings of Plaintiffs' Subject Compositions including, but not limited to, the recordings identified in Exhibit B-161. Exhibit B-161 sets forth a non-exhaustive list of specific pirated recordings embodying Subject Compositions that have been reproduced and distributed by Defendants Marathon Media Int. Ltd., Second Wind Digital and Microsoft without authorization. These Defendants have willfully infringed Plaintiffs' copyrights in the Subject Compositions by the methods identified in Exhibit B-161 (or have authorized such activity) without obtaining authorization to do so.

1 **One Hundred Sixty-Second Claim – Copyright Infringement**
2 **Against Vintage Music SL, Orchard, and Microsoft**

3 475. Plaintiffs repeat each and every allegation of the Complaint.

4 476. As a separate specific course of infringement, Defendants Vintage
5 Music SL, Orchard, and Microsoft have unlawfully reproduced and distributed
6 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
7 limited to, the recordings identified in Exhibit B-162. Exhibit B-162 sets forth a
8 non-exhaustive list of specific pirated recordings embodying Subject Compositions
9 that have been reproduced and distributed by Defendants Vintage Music SL,
10 Orchard, and Microsoft without authorization. These Defendants have willfully
11 infringed Plaintiffs' copyrights in the Subject Compositions by the methods
12 identified in Exhibit B-162 (or have authorized such activity) without obtaining
13 authorization to do so.

14 **One Hundred Sixty-Third Claim – Copyright Infringement**
15 **Against Acrobat Music Ltd., Orchard, and Microsoft**

16 477. Plaintiffs repeat each and every allegation of the Complaint.

17 478. As a separate specific course of infringement, Defendants Acrobat
18 Music Ltd., Orchard, and Microsoft have unlawfully reproduced and distributed
19 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
20 limited to, the recordings identified in Exhibit B-163. Exhibit B-163 sets forth a
21 non-exhaustive list of specific pirated recordings embodying Subject Compositions
22 that have been reproduced and distributed by Defendants Acrobat Music Ltd.,
23 Orchard, and Microsoft without authorization. These Defendants have willfully
24 infringed Plaintiffs' copyrights in the Subject Compositions by the methods
25 identified in Exhibit B-163 (or have authorized such activity) without obtaining
26 authorization to do so.

1 **One Hundred Sixty-Fourth Claim – Copyright Infringement**
 2 **Against DWK Records, Ingrooves, and Microsoft**

3 479. Plaintiffs repeat each and every allegation of the Complaint.

4 480. As a separate specific course of infringement, Defendants DWK
 5 Records, Ingrooves, and Microsoft have unlawfully reproduced and distributed
 6 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
 7 limited to, the recordings identified in Exhibit B-164. Exhibit B-164 sets forth a
 8 non-exhaustive list of specific pirated recordings embodying Subject Compositions
 9 that have been reproduced and distributed by Defendants DWK Records, Ingrooves,
 10 and Microsoft without authorization. These Defendants have willfully infringed
 11 Plaintiffs' copyrights in the Subject Compositions by the methods identified in
 12 Exhibit B-164 (or have authorized such activity) without obtaining authorization to
 13 do so.

14 **One Hundred Sixty-Fifth Claim – Copyright Infringement**
 15 **Against Henry Hadaway Organization Limited, Orchard, and Microsoft**

16 481. Plaintiffs repeat each and every allegation of the Complaint.

17 482. As a separate specific course of infringement, Defendants Henry
 18 Hadaway Organization Limited, Orchard, and Microsoft have unlawfully
 19 reproduced and distributed unauthorized recordings of Plaintiffs' Subject
 20 Compositions including, but not limited to, the recordings identified in Exhibit B-
 21 165. Exhibit B-165 sets forth a non-exhaustive list of specific pirated recordings
 22 embodying Subject Compositions that have been reproduced and distributed by
 23 Defendants Henry Hadaway Organization Limited, Orchard, and Microsoft without
 24 authorization. These Defendants have willfully infringed Plaintiffs' copyrights in the
 25 Subject Compositions by the methods identified in Exhibit B-165 (or have
 26 authorized such activity) without obtaining authorization to do so.

1 **One Hundred Sixty-Sixth Claim – Copyright Infringement**
2 **Against Primephonic USA Inc., Naxos of America, and Microsoft**

3 483. Plaintiffs repeat each and every allegation of the Complaint.

4 484. As a separate specific course of infringement, Defendants Primephonic
5 USA Inc., Naxos of America, and Microsoft have unlawfully reproduced and
6 distributed unauthorized recordings of Plaintiffs' Subject Compositions including,
7 but not limited to, the recordings identified in Exhibit B-166. Exhibit B-166 sets
8 forth a non-exhaustive list of specific pirated recordings embodying Subject
9 Compositions that have been reproduced and distributed by Defendants
10 Primephonic USA Inc., Naxos of America, and Microsoft without authorization.
11 These Defendants have willfully infringed Plaintiffs' copyrights in the Subject
12 Compositions by the methods identified in Exhibit B-166 (or have authorized such
13 activity) without obtaining authorization to do so.

14 **One Hundred Sixty-Seventh Claim – Copyright Infringement**
15 **Against Future Noise Music Limited, Orchard, and Microsoft**

16 485. Plaintiffs repeat each and every allegation of the Complaint.

17 486. As a separate specific course of infringement, Defendants Future Noise
18 Music Limited, Orchard, and Microsoft have unlawfully reproduced and distributed
19 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
20 limited to, the recordings identified in Exhibit B-167. Exhibit B-167 sets forth a
21 non-exhaustive list of specific pirated recordings embodying Subject Compositions
22 that have been reproduced and distributed by Defendants Future Noise Music
23 Limited, Orchard, and Microsoft without authorization. These Defendants have
24 willfully infringed Plaintiffs' copyrights in the Subject Compositions by the
25 methods identified in Exhibit B-167 (or have authorized such activity) without
26 obtaining authorization to do so.

**One Hundred Sixty-Eighth Claim – Copyright Infringement
Against CTS Digital, State51, and Microsoft**

487. Plaintiffs repeat each and every allegation of the Complaint.

488. As a separate specific course of infringement, Defendants CTS Digital, State51, and Microsoft have unlawfully reproduced and distributed unauthorized recordings of Plaintiffs' Subject Compositions including, but not limited to, the recordings identified in Exhibit B-168. Exhibit B-168 sets forth a non-exhaustive list of specific pirated recordings embodying Subject Compositions that have been reproduced and distributed by Defendants CTS Digital, State51, and Microsoft without authorization. These Defendants have willfully infringed Plaintiffs' copyrights in the Subject Compositions by the methods identified in Exhibit B-168 (or have authorized such activity) without obtaining authorization to do so.

**One Hundred Sixty-Ninth Claim – Copyright Infringement
Against Pink Dot, "John Doe" Distributor, and Microsoft**

489. Plaintiffs repeat each and every allegation of the Complaint.

490. As a separate specific course of infringement, Defendants Pink Dot, "John Doe" Distributor, and Microsoft have unlawfully reproduced and distributed unauthorized recordings of Plaintiffs' Subject Compositions including, but not limited to, the recordings identified in Exhibit B-169. Exhibit B-169 sets forth a non-exhaustive list of specific pirated recordings embodying Subject Compositions that have been reproduced and distributed by Defendants Pink Dot, "John Doe" Distributor, and Microsoft without authorization. These Defendants have willfully infringed Plaintiffs' copyrights in the Subject Compositions by the methods identified in Exhibit B-169 (or have authorized such activity) without obtaining authorization to do so.

1 **One Hundred Seventieth Claim – Copyright Infringement**
2 **Against SendDigital, "John Doe" Distributor, and Microsoft**

3 491. Plaintiffs repeat each and every allegation of the Complaint.

4 492. As a separate specific course of infringement, Defendants SendDigital,
5 "John Doe" Distributor, and Microsoft have unlawfully reproduced and distributed
6 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
7 limited to, the recordings identified in Exhibit B-170. Exhibit B-170 sets forth a
8 non-exhaustive list of specific pirated recordings embodying Subject Compositions
9 that have been reproduced and distributed by Defendants SendDigital, "John Doe"
10 Distributor, and Microsoft without authorization. These Defendants have willfully
11 infringed Plaintiffs' copyrights in the Subject Compositions by the methods
12 identified in Exhibit B-170 (or have authorized such activity) without obtaining
13 authorization to do so.

14 **One Hundred Seventy-First Claim – Copyright Infringement**
15 **Against Jazzsential, Ingrooves, and Microsoft**

16 493. Plaintiffs repeat each and every allegation of the Complaint.

17 494. As a separate specific course of infringement, Defendants Jazzsential,
18 Ingrooves, and Microsoft have unlawfully reproduced and distributed unauthorized
19 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
20 recordings identified in Exhibit B-171. Exhibit B-171 sets forth a non-exhaustive list
21 of specific pirated recordings embodying Subject Compositions that have been
22 reproduced and distributed by Defendants Jazzsential, Ingrooves, and Microsoft
23 without authorization. These Defendants have willfully infringed Plaintiffs'
24 copyrights in the Subject Compositions by the methods identified in Exhibit B-171
25 (or have authorized such activity) without obtaining authorization to do so.

1 **One Hundred Seventy-Second Claim – Copyright Infringement**
2 **Against Avid Group, Orchard, and Microsoft**

3 495. Plaintiffs repeat each and every allegation of the Complaint.

4 496. As a separate specific course of infringement, Defendants Avid Group,
5 Orchard, and Microsoft have unlawfully reproduced and distributed unauthorized
6 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
7 recordings identified in Exhibit B-172. Exhibit B-172 sets forth a non-exhaustive list
8 of specific pirated recordings embodying Subject Compositions that have been
9 reproduced and distributed by Defendants Avid Group, Orchard, and Microsoft
10 without authorization. These Defendants have willfully infringed Plaintiffs'
11 copyrights in the Subject Compositions by the methods identified in Exhibit B-172
12 (or have authorized such activity) without obtaining authorization to do so.

13 **One Hundred Seventy-Third Claim – Copyright Infringement**
14 **Against Michael Bennett, Ingrooves, and Microsoft**

15 497. Plaintiffs repeat each and every allegation of the Complaint.

16 498. As a separate specific course of infringement, Defendants Michael
17 Bennett, Ingrooves, and Microsoft have unlawfully reproduced and distributed
18 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
19 limited to, the recordings identified in Exhibit B-173. Exhibit B-173 sets forth a
20 non-exhaustive list of specific pirated recordings embodying Subject Compositions
21 that have been reproduced and distributed by Defendants Michael Bennett,
22 Ingrooves, and Microsoft without authorization. These Defendants have willfully
23 infringed Plaintiffs' copyrights in the Subject Compositions by the methods
24 identified in Exhibit B-173 (or have authorized such activity) without obtaining
25 authorization to do so.

1 **One Hundred Seventy-Fourth Claim – Copyright Infringement**
 2 **Against Entertain Me Ltd., Orchard, and Microsoft**

3 499. Plaintiffs repeat each and every allegation of the Complaint.

4 500. As a separate specific course of infringement, Defendants Entertain Me
 5 Ltd., Orchard, and Microsoft have unlawfully reproduced and distributed
 6 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
 7 limited to, the recordings identified in Exhibit B-174. Exhibit B-174 sets forth a
 8 non-exhaustive list of specific pirated recordings embodying Subject Compositions
 9 that have been reproduced and distributed by Defendants Entertain Me Ltd.,
 10 Orchard, and Microsoft without authorization. These Defendants have willfully
 11 infringed Plaintiffs' copyrights in the Subject Compositions by the methods
 12 identified in Exhibit B-174 (or have authorized such activity) without obtaining
 13 authorization to do so.

14 **One Hundred Seventy-Fifth Claim – Copyright Infringement**
 15 **Against Cherished Records, Ingrooves, and Microsoft**

16 501. Plaintiffs repeat each and every allegation of the Complaint.

17 502. As a separate specific course of infringement, Defendants Cherished
 18 Records, Ingrooves, and Microsoft have unlawfully reproduced and distributed
 19 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
 20 limited to, the recordings identified in Exhibit B-175. Exhibit B-175 sets forth a
 21 non-exhaustive list of specific pirated recordings embodying Subject Compositions
 22 that have been reproduced and distributed by Defendants Cherished Records,
 23 Ingrooves, and Microsoft without authorization. These Defendants have willfully
 24 infringed Plaintiffs' copyrights in the Subject Compositions by the methods
 25 identified in Exhibit B-175 (or have authorized such activity) without obtaining
 26 authorization to do so.

**One Hundred Seventy-Sixth Claim – Copyright Infringement
Against Vintage Records, Orchard, and Microsoft**

503. Plaintiffs repeat each and every allegation of the Complaint.

504. As a separate specific course of infringement, Defendants Vintage Records, Orchard, and Microsoft have unlawfully reproduced and distributed unauthorized recordings of Plaintiffs' Subject Compositions including, but not limited to, the recordings identified in Exhibit B-176. Exhibit B-176 sets forth a non-exhaustive list of specific pirated recordings embodying Subject Compositions that have been reproduced and distributed by Defendants Vintage Records, Orchard, and Microsoft without authorization. These Defendants have willfully infringed Plaintiffs' copyrights in the Subject Compositions by the methods identified in Exhibit B-176 (or have authorized such activity) without obtaining authorization to do so.

**One Hundred Seventy-Seventh Claim – Copyright Infringement
Against Gralin Music, Ingrooves, and Microsoft**

505. Plaintiffs repeat each and every allegation of the Complaint.

506. As a separate specific course of infringement, Defendants Gralin Music, Ingrooves, and Microsoft have unlawfully reproduced and distributed unauthorized recordings of Plaintiffs' Subject Compositions including, but not limited to, the recordings identified in Exhibit B-177. Exhibit B-177 sets forth a non-exhaustive list of specific pirated recordings embodying Subject Compositions that have been reproduced and distributed by Defendants Gralin Music, Ingrooves, and Microsoft without authorization. These Defendants have willfully infringed Plaintiffs' copyrights in the Subject Compositions by the methods identified in Exhibit B-177 (or have authorized such activity) without obtaining authorization to do so.

**One Hundred Seventy-Eighth Claim – Copyright Infringement
Against Mach60 Music, State51, and Microsoft**

507. Plaintiffs repeat each and every allegation of the Complaint.

508. As a separate specific course of infringement, Defendants Mach60 Music, State51, and Microsoft have unlawfully reproduced and distributed unauthorized recordings of Plaintiffs' Subject Compositions including, but not limited to, the recordings identified in Exhibit B-178. Exhibit B-178 sets forth a non-exhaustive list of specific pirated recordings embodying Subject Compositions that have been reproduced and distributed by Defendants Mach60 Music, State51, and Microsoft without authorization. These Defendants have willfully infringed Plaintiffs' copyrights in the Subject Compositions by the methods identified in Exhibit B-178 (or have authorized such activity) without obtaining authorization to do so.

**One Hundred Seventy-Ninth Claim – Copyright Infringement
Against Xelon Entertainment Pty. Ltd., "John Doe" Distributor, and Microsoft**

509. Plaintiffs repeat each and every allegation of the Complaint.

510. As a separate specific course of infringement, Defendants Xelon Entertainment Pty. Ltd., "John Doe" Distributor, and Microsoft have unlawfully reproduced and distributed unauthorized recordings of Plaintiffs' Subject Compositions including, but not limited to, the recordings identified in Exhibit B-179. Exhibit B-179 sets forth a non-exhaustive list of specific pirated recordings embodying Subject Compositions that have been reproduced and distributed by Defendants Xelon Entertainment Pty. Ltd., "John Doe" Distributor, and Microsoft without authorization. These Defendants have willfully infringed Plaintiffs' copyrights in the Subject Compositions by the methods identified in Exhibit B-179 (or have authorized such activity) without obtaining authorization to do so.

1 **One Hundred Eightieth Claim – Copyright Infringement**
2 **Against Jazz Moon, Orchard, and Microsoft**

3 511. Plaintiffs repeat each and every allegation of the Complaint.

4 512. As a separate specific course of infringement, Defendants Jazz Moon,
5 Orchard, and Microsoft have unlawfully reproduced and distributed unauthorized
6 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
7 recordings identified in Exhibit B-180. Exhibit B-180 sets forth a non-exhaustive list
8 of specific pirated recordings embodying Subject Compositions that have been
9 reproduced and distributed by Defendants Jazz Moon, Orchard, and Microsoft
10 without authorization. These Defendants have willfully infringed Plaintiffs'
11 copyrights in the Subject Compositions by the methods identified in Exhibit B-180
12 (or have authorized such activity) without obtaining authorization to do so.

13 **One Hundred Eighty-First Claim – Copyright Infringement**
14 **Against Jazz Co., Orchard, and Microsoft**

15 513. Plaintiffs repeat each and every allegation of the Complaint.

16 514. As a separate specific course of infringement, Defendants Jazz Co.,
17 Orchard, and Microsoft have unlawfully reproduced and distributed unauthorized
18 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
19 recordings identified in Exhibit B-181. Exhibit B-181 sets forth a non-exhaustive list
20 of specific pirated recordings embodying Subject Compositions that have been
21 reproduced and distributed by Defendants Jazz Co., Orchard, and Microsoft without
22 authorization. These Defendants have willfully infringed Plaintiffs' copyrights in the
23 Subject Compositions by the methods identified in Exhibit B-181 (or have
24 authorized such activity) without obtaining authorization to do so.

1 **One Hundred Eighty-Second Claim – Copyright Infringement**
2 **Against Plenty Jazz Records, Orchard, and Microsoft**

3 515. Plaintiffs repeat each and every allegation of the Complaint.

4 516. As a separate specific course of infringement, Defendants Plenty Jazz
5 Records, Orchard, and Microsoft have unlawfully reproduced and distributed
6 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
7 limited to, the recordings identified in Exhibit B-182. Exhibit B-182 sets forth a
8 non-exhaustive list of specific pirated recordings embodying Subject Compositions
9 that have been reproduced and distributed by Defendants Plenty Jazz Records,
10 Orchard, and Microsoft without authorization. These Defendants have willfully
11 infringed Plaintiffs' copyrights in the Subject Compositions by the methods
12 identified in Exhibit B-182 (or have authorized such activity) without obtaining
13 authorization to do so.

14 **One Hundred Eighty-Third Claim – Copyright Infringement**
15 **Against Move, Phonofile, and Microsoft**

16 517. Plaintiffs repeat each and every allegation of the Complaint.

17 518. As a separate specific course of infringement, Defendants Move,
18 Phonofile, and Microsoft have unlawfully reproduced and distributed unauthorized
19 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
20 recordings identified in Exhibit B-183. Exhibit B-183 sets forth a non-exhaustive list
21 of specific pirated recordings embodying Subject Compositions that have been
22 reproduced and distributed by Defendants Move, Phonofile, and Microsoft without
23 authorization. These Defendants have willfully infringed Plaintiffs' copyrights in the
24 Subject Compositions by the methods identified in Exhibit B-183 (or have
25 authorized such activity) without obtaining authorization to do so.

1 **One Hundred Eighty-Fourth Claim – Copyright Infringement**
2 **Against Railroad, Orchard, and Microsoft**

3 519. Plaintiffs repeat each and every allegation of the Complaint.

4 520. As a separate specific course of infringement, Defendants Railroad,
5 Orchard, and Microsoft have unlawfully reproduced and distributed unauthorized
6 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
7 recordings identified in Exhibit B-184. Exhibit B-184 sets forth a non-exhaustive list
8 of specific pirated recordings embodying Subject Compositions that have been
9 reproduced and distributed by Defendants Railroad, Orchard, and Microsoft without
10 authorization. These Defendants have willfully infringed Plaintiffs' copyrights in the
11 Subject Compositions by the methods identified in Exhibit B-184 (or have
12 authorized such activity) without obtaining authorization to do so.

13 **One Hundred Eighty-Fifth Claim – Copyright Infringement**
14 **Against Triton, Orchard, and Microsoft**

15 521. Plaintiffs repeat each and every allegation of the Complaint.

16 522. As a separate specific course of infringement, Defendants Triton,
17 Orchard, and Microsoft have unlawfully reproduced and distributed unauthorized
18 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
19 recordings identified in Exhibit B-185. Exhibit B-185 sets forth a non-exhaustive list
20 of specific pirated recordings embodying Subject Compositions that have been
21 reproduced and distributed by Defendants Triton, Orchard, and Microsoft without
22 authorization. These Defendants have willfully infringed Plaintiffs' copyrights in the
23 Subject Compositions by the methods identified in Exhibit B-185 (or have
24 authorized such activity) without obtaining authorization to do so.

1 **One Hundred Eighty-Sixth Claim – Copyright Infringement**
 2 **Against Rarity Music, Believe Digital, and Microsoft**

3 523. Plaintiffs repeat each and every allegation of the Complaint.

4 524. As a separate specific course of infringement, Defendants Rarity
 5 Music, Believe Digital, and Microsoft have unlawfully reproduced and distributed
 6 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
 7 limited to, the recordings identified in Exhibit B-186. Exhibit B-186 sets forth a
 8 non-exhaustive list of specific pirated recordings embodying Subject Compositions
 9 that have been reproduced and distributed by Defendants Rarity Music, Believe
 10 Digital, and Microsoft without authorization. These Defendants have willfully
 11 infringed Plaintiffs' copyrights in the Subject Compositions by the methods
 12 identified in Exhibit B-186 (or have authorized such activity) without obtaining
 13 authorization to do so.

14 **One Hundred Eighty-Seventh Claim – Copyright Infringement**
 15 **Against Lionfish Music, Believe Digital, and Microsoft**

16 525. Plaintiffs repeat each and every allegation of the Complaint.

17 526. As a separate specific course of infringement, Defendants Lionfish
 18 Music, Believe Digital, and Microsoft have unlawfully reproduced and distributed
 19 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
 20 limited to, the recordings identified in Exhibit B-187. Exhibit B-187 sets forth a
 21 non-exhaustive list of specific pirated recordings embodying Subject Compositions
 22 that have been reproduced and distributed by Defendants Lionfish Music, Believe
 23 Digital, and Microsoft without authorization. These Defendants have willfully
 24 infringed Plaintiffs' copyrights in the Subject Compositions by the methods
 25 identified in Exhibit B-187 (or have authorized such activity) without obtaining
 26 authorization to do so.

1 **One Hundred Eighty-Eighth Claim – Copyright Infringement**
2 **Against OVC Media, "John Doe" Distributor, and Microsoft**

3 527. Plaintiffs repeat each and every allegation of the Complaint.

4 528. As a separate specific course of infringement, Defendants OVC Media,
5 "John Doe" Distributor, and Microsoft have unlawfully reproduced and distributed
6 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
7 limited to, the recordings identified in Exhibit B-188. Exhibit B-188 sets forth a
8 non-exhaustive list of specific pirated recordings embodying Subject Compositions
9 that have been reproduced and distributed by Defendants OVC Media, "John Doe"
10 Distributor, and Microsoft without authorization. These Defendants have willfully
11 infringed Plaintiffs' copyrights in the Subject Compositions by the methods
12 identified in Exhibit B-188 (or have authorized such activity) without obtaining
13 authorization to do so.

14 **One Hundred Eighty-Ninth Claim – Copyright Infringement**
15 **Against Favorite Classics, Believe Digital, and Microsoft**

16 529. Plaintiffs repeat each and every allegation of the Complaint.

17 530. As a separate specific course of infringement, Defendants Favorite
18 Classics, Believe Digital, and Microsoft have unlawfully reproduced and distributed
19 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
20 limited to, the recordings identified in Exhibit B-189. Exhibit B-189 sets forth a
21 non-exhaustive list of specific pirated recordings embodying Subject Compositions
22 that have been reproduced and distributed by Defendants Favorite Classics, Believe
23 Digital, and Microsoft without authorization. These Defendants have willfully
24 infringed Plaintiffs' copyrights in the Subject Compositions by the methods
25 identified in Exhibit B-189 (or have authorized such activity) without obtaining
26 authorization to do so.

1 **One Hundred Ninetieth Claim – Copyright Infringement**
2 **Against Historical Jazz, Orchard, and Microsoft**

3 531. Plaintiffs repeat each and every allegation of the Complaint.

4 532. As a separate specific course of infringement, Defendants Historical
5 Jazz, Orchard, and Microsoft have unlawfully reproduced and distributed
6 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
7 limited to, the recordings identified in Exhibit B-190. Exhibit B-190 sets forth a
8 non-exhaustive list of specific pirated recordings embodying Subject Compositions
9 that have been reproduced and distributed by Defendants Historical Jazz, Orchard,
10 and Microsoft without authorization. These Defendants have willfully infringed
11 Plaintiffs' copyrights in the Subject Compositions by the methods identified in
12 Exhibit B-190 (or have authorized such activity) without obtaining authorization to
13 do so.

14 **One Hundred Ninety-First Claim – Copyright Infringement**
15 **Against Classics, "John Doe" Distributor, and Microsoft**

16 533. Plaintiffs repeat each and every allegation of the Complaint.

17 534. As a separate specific course of infringement, Defendants Classics,
18 "John Doe" Distributor, and Microsoft have unlawfully reproduced and distributed
19 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
20 limited to, the recordings identified in Exhibit B-191. Exhibit B-191 sets forth a
21 non-exhaustive list of specific pirated recordings embodying Subject Compositions
22 that have been reproduced and distributed by Defendants Classics, "John Doe"
23 Distributor, and Microsoft without authorization. These Defendants have willfully
24 infringed Plaintiffs' copyrights in the Subject Compositions by the methods
25 identified in Exhibit B-191 (or have authorized such activity) without obtaining
26 authorization to do so.

1 **One Hundred Ninety-Second Claim – Copyright Infringement**
2 **Against Impressions, Orchard, and Microsoft**

3 535. Plaintiffs repeat each and every allegation of the Complaint.

4 536. As a separate specific course of infringement, Defendants Impressions,
5 Orchard, and Microsoft have unlawfully reproduced and distributed unauthorized
6 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
7 recordings identified in Exhibit B-192. Exhibit B-192 sets forth a non-exhaustive list
8 of specific pirated recordings embodying Subject Compositions that have been
9 reproduced and distributed by Defendants Impressions, Orchard, and Microsoft
10 without authorization. These Defendants have willfully infringed Plaintiffs'
11 copyrights in the Subject Compositions by the methods identified in Exhibit B-192
12 (or have authorized such activity) without obtaining authorization to do so.

13 **One Hundred Ninety-Third Claim – Copyright Infringement**
14 **Against Plaza Mayor Company Limited, Orchard, and Microsoft**

15 537. Plaintiffs repeat each and every allegation of the Complaint.

16 538. As a separate specific course of infringement, Defendants Plaza Mayor
17 Company Limited, Orchard, and Microsoft have unlawfully reproduced and
18 distributed unauthorized recordings of Plaintiffs' Subject Compositions including,
19 but not limited to, the recordings identified in Exhibit B-193. Exhibit B-193 sets
20 forth a non-exhaustive list of specific pirated recordings embodying Subject
21 Compositions that have been reproduced and distributed by Defendants Plaza Mayor
22 Company Limited, Orchard, and Microsoft without authorization. These Defendants
23 have willfully infringed Plaintiffs' copyrights in the Subject Compositions by the
24 methods identified in Exhibit B-193 (or have authorized such activity) without
25 obtaining authorization to do so.

1 **One Hundred Ninety-Fourth Claim – Copyright Infringement**
2 **Against Digital Gramophone, Orchard, and Microsoft**

3 539. Plaintiffs repeat each and every allegation of the Complaint.

4 540. As a separate specific course of infringement, Defendants Digital
5 Gramophone, Orchard, and Microsoft have unlawfully reproduced and distributed
6 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
7 limited to, the recordings identified in Exhibit B-194. Exhibit B-194 sets forth a
8 non-exhaustive list of specific pirated recordings embodying Subject Compositions
9 that have been reproduced and distributed by Defendants Digital Gramophone,
10 Orchard, and Microsoft without authorization. These Defendants have willfully
11 infringed Plaintiffs' copyrights in the Subject Compositions by the methods
12 identified in Exhibit B-194 (or have authorized such activity) without obtaining
13 authorization to do so.

14 **One Hundred Ninety-Fifth Claim – Copyright Infringement**
15 **Against Brisa Records, Orchard, and Microsoft**

16 541. Plaintiffs repeat each and every allegation of the Complaint.

17 542. As a separate specific course of infringement, Defendants Brisa
18 Records, Orchard, and Microsoft have unlawfully reproduced and distributed
19 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
20 limited to, the recordings identified in Exhibit B-195. Exhibit B-195 sets forth a
21 non-exhaustive list of specific pirated recordings embodying Subject Compositions
22 that have been reproduced and distributed by Defendants Brisa Records, Orchard,
23 and Microsoft without authorization. These Defendants have willfully infringed
24 Plaintiffs' copyrights in the Subject Compositions by the methods identified in
25 Exhibit B-195 (or have authorized such activity) without obtaining authorization to
26 do so.

1 **One Hundred Ninety-Sixth Claim – Copyright Infringement**
2 **Against Blaricum C.D. Company (B.C.D.) BV, Orchard, and Microsoft**

3 543. Plaintiffs repeat each and every allegation of the Complaint.

4 544. As a separate specific course of infringement, Defendants Blaricum
5 C.D. Company (B.C.D.) BV, Orchard, and Microsoft have unlawfully reproduced
6 and distributed unauthorized recordings of Plaintiffs' Subject Compositions
7 including, but not limited to, the recordings identified in Exhibit B-196. Exhibit B-
8 196 sets forth a non-exhaustive list of specific pirated recordings embodying Subject
9 Compositions that have been reproduced and distributed by Defendants Blaricum
10 C.D. Company (B.C.D.) BV, Orchard, and Microsoft without authorization. These
11 Defendants have willfully infringed Plaintiffs' copyrights in the Subject
12 Compositions by the methods identified in Exhibit B-196 (or have authorized such
13 activity) without obtaining authorization to do so.

14 **One Hundred Ninety-Seventh Claim – Copyright Infringement**
15 **Against Pickwick Group Limited, Orchard, and Pandora**

16 545. Plaintiffs repeat each and every allegation of the Complaint.

17 546. As a separate specific course of infringement, Defendants Pickwick
18 Group Limited, Orchard, and Pandora have unlawfully reproduced and distributed
19 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
20 limited to, the recordings identified in Exhibit B-197. Exhibit B-197 sets forth a
21 non-exhaustive list of specific pirated recordings embodying Subject Compositions
22 that have been reproduced and distributed by Defendants Pickwick Group Limited,
23 Orchard, and Pandora without authorization. These Defendants have willfully
24 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
25 Compositions by the methods identified in Exhibit B-197 (or have authorized such
26 activity) without obtaining authorization to do so.

1 **One Hundred Ninety-Eighth Claim – Copyright Infringement**
 2 **Against Cleopatra Records, Inc., Orchard, and Pandora**

3 547. Plaintiffs repeat each and every allegation of the Complaint.

4 548. As a separate specific course of infringement, Defendants Cleopatra
 5 Records, Inc., Orchard, and Pandora have unlawfully reproduced and distributed
 6 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
 7 limited to, the recordings identified in Exhibit B-198. Exhibit B-198 sets forth a
 8 non-exhaustive list of specific pirated recordings embodying Subject Compositions
 9 that have been reproduced and distributed by Defendants Cleopatra Records, Inc.,
 10 Orchard, and Pandora without authorization. These Defendants have willfully
 11 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
 12 Compositions by the methods identified in Exhibit B-198 (or have authorized such
 13 activity) without obtaining authorization to do so.

14 **One Hundred Ninety-Ninth Claim – Copyright Infringement**
 15 **Against TVP, Inc., Orchard, and Pandora**

16 549. Plaintiffs repeat each and every allegation of the Complaint.

17 550. As a separate specific course of infringement, Defendants TVP, Inc.,
 18 Orchard, and Pandora have unlawfully reproduced and distributed unauthorized
 19 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
 20 recordings identified in Exhibit B-199. Exhibit B-199 sets forth a non-exhaustive list
 21 of specific pirated recordings embodying Subject Compositions that have been
 22 reproduced and distributed by Defendants TVP, Inc., Orchard, and Pandora without
 23 authorization. These Defendants have willfully infringed, and are continuing to
 24 infringe, Plaintiffs' copyrights in the Subject Compositions by the methods
 25 identified in Exhibit B-199 (or have authorized such activity) without obtaining
 26 authorization to do so.

1 **Two Hundredth Claim – Copyright Infringement**
2 **Against Marathon Media Int. Ltd., Second Wind Digital and Pandora**

3 551. Plaintiffs repeat each and every allegation of the Complaint.

4 552. As a separate specific course of infringement, Defendants Marathon
5 Media Int. Ltd., Second Wind Digital and Pandora have unlawfully reproduced and
6 distributed unauthorized recordings of Plaintiffs' Subject Compositions including,
7 but not limited to, the recordings identified in Exhibit B-200. Exhibit B-200 sets
8 forth a non-exhaustive list of specific pirated recordings embodying Subject
9 Compositions that have been reproduced and distributed by Defendants Marathon
10 Media Int. Ltd., Second Wind Digital and Pandora without authorization. These
11 Defendants have willfully infringed, and are continuing to infringe, Plaintiffs'
12 copyrights in the Subject Compositions by the methods identified in Exhibit B-200
13 (or have authorized such activity) without obtaining authorization to do so.

14 **Two Hundred First Claim – Copyright Infringement**
15 **Against Avid Group, Orchard, and Pandora**

16 553. Plaintiffs repeat each and every allegation of the Complaint.

17 554. As a separate specific course of infringement, Defendants Avid Group,
18 Orchard, and Pandora have unlawfully reproduced and distributed unauthorized
19 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
20 recordings identified in Exhibit B-201. Exhibit B-201 sets forth a non-exhaustive list
21 of specific pirated recordings embodying Subject Compositions that have been
22 reproduced and distributed by Defendants Avid Group, Orchard, and Pandora
23 without authorization. These Defendants have willfully infringed, and are
24 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
25 methods identified in Exhibit B-201 (or have authorized such activity) without
26 obtaining authorization to do so.

**Two Hundred Second Claim – Copyright Infringement
Against Impressions, Orchard, and Pandora**

555. Plaintiffs repeat each and every allegation of the Complaint.

556. As a separate specific course of infringement, Defendants Impressions, Orchard, and Pandora have unlawfully reproduced and distributed unauthorized recordings of Plaintiffs' Subject Compositions including, but not limited to, the recordings identified in Exhibit B-202. Exhibit B-202 sets forth a non-exhaustive list of specific pirated recordings embodying Subject Compositions that have been reproduced and distributed by Defendants Impressions, Orchard, and Pandora without authorization. These Defendants have willfully infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the methods identified in Exhibit B-202 (or have authorized such activity) without obtaining authorization to do so.

**Two Hundred Third Claim – Copyright Infringement
Against Classics, "John Doe" Distributor, and Pandora**

557. Plaintiffs repeat each and every allegation of the Complaint.

558. As a separate specific course of infringement, Defendants Classics, "John Doe" Distributor, and Pandora have unlawfully reproduced and distributed unauthorized recordings of Plaintiffs' Subject Compositions including, but not limited to, the recordings identified in Exhibit B-203. Exhibit B-203 sets forth a non-exhaustive list of specific pirated recordings embodying Subject Compositions that have been reproduced and distributed by Defendants Classics, "John Doe" Distributor, and Pandora without authorization. These Defendants have willfully infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the methods identified in Exhibit B-203 (or have authorized such activity) without obtaining authorization to do so.

1 **Two Hundred Fourth Claim – Copyright Infringement**
2 **Against Ideal Music, Ingrooves, and Pandora**

3 559. Plaintiffs repeat each and every allegation of the Complaint.

4 560. As a separate specific course of infringement, Defendants Ideal Music,
5 Ingrooves, and Pandora have unlawfully reproduced and distributed unauthorized
6 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
7 recordings identified in Exhibit B-204. Exhibit B-204 sets forth a non-exhaustive list
8 of specific pirated recordings embodying Subject Compositions that have been
9 reproduced and distributed by Defendants Ideal Music, Ingrooves, and Pandora
10 without authorization. These Defendants have willfully infringed, and are
11 continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
12 methods identified in Exhibit B-204 (or have authorized such activity) without
13 obtaining authorization to do so.

14 **Two Hundred Fifth Claim – Copyright Infringement**
15 **Against OVC Media, "John Doe" Distributor, and Pandora**

16 561. Plaintiffs repeat each and every allegation of the Complaint.

17 562. As a separate specific course of infringement, Defendants OVC Media,
18 "John Doe" Distributor, and Pandora have unlawfully reproduced and distributed
19 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
20 limited to, the recordings identified in Exhibit B-205. Exhibit B-205 sets forth a
21 non-exhaustive list of specific pirated recordings embodying Subject Compositions
22 that have been reproduced and distributed by Defendants OVC Media, "John Doe"
23 Distributor, and Pandora without authorization. These Defendants have willfully
24 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
25 Compositions by the methods identified in Exhibit B-205 (or have authorized such
26 activity) without obtaining authorization to do so.

1 **Two Hundred Sixth Claim – Copyright Infringement**
2 **Against Gralin Music, Ingrooves, and Pandora**

3 563. Plaintiffs repeat each and every allegation of the Complaint.

4 564. As a separate specific course of infringement, Defendants Gralin
5 Music, Ingrooves, and Pandora have unlawfully reproduced and distributed
6 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
7 limited to, the recordings identified in Exhibit B-206. Exhibit B-206 sets forth a
8 non-exhaustive list of specific pirated recordings embodying Subject Compositions
9 that have been reproduced and distributed by Defendants Gralin Music, Ingrooves,
10 and Pandora without authorization. These Defendants have willfully infringed, and
11 are continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
12 methods identified in Exhibit B-206 (or have authorized such activity) without
13 obtaining authorization to do so.

14 **Two Hundred Seventh Claim – Copyright Infringement**
15 **Against Jazz Co., Orchard, and Pandora**

16 565. Plaintiffs repeat each and every allegation of the Complaint.

17 566. As a separate specific course of infringement, Defendants Jazz Co.,
18 Orchard, and Pandora have unlawfully reproduced and distributed unauthorized
19 recordings of Plaintiffs' Subject Compositions including, but not limited to, the
20 recordings identified in Exhibit B-207. Exhibit B-207 sets forth a non-exhaustive list
21 of specific pirated recordings embodying Subject Compositions that have been
22 reproduced and distributed by Defendants Jazz Co., Orchard, and Pandora without
23 authorization. These Defendants have willfully infringed, and are continuing to
24 infringe, Plaintiffs' copyrights in the Subject Compositions by the methods
25 identified in Exhibit B-207 (or have authorized such activity) without obtaining
26 authorization to do so.

1 **Two Hundred Eighth Claim – Copyright Infringement**
2 **Against Historical Jazz, Orchard, and Pandora**

3 567. Plaintiffs repeat each and every allegation of the Complaint.

4 568. As a separate specific course of infringement, Defendants Historical
5 Jazz, Orchard, and Pandora have unlawfully reproduced and distributed
6 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
7 limited to, the recordings identified in Exhibit B-208. Exhibit B-208 sets forth a
8 non-exhaustive list of specific pirated recordings embodying Subject Compositions
9 that have been reproduced and distributed by Defendants Historical Jazz, Orchard,
10 and Pandora without authorization. These Defendants have willfully infringed, and
11 are continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the
12 methods identified in Exhibit B-208 (or have authorized such activity) without
13 obtaining authorization to do so.

14 **Two Hundred Ninth Claim – Copyright Infringement**
15 **Against Hasmick Promotions Limited, Orchard, and Pandora**

16 569. Plaintiffs repeat each and every allegation of the Complaint.

17 570. As a separate specific course of infringement, Defendants Hasmick
18 Promotions Limited, Orchard, and Pandora have unlawfully reproduced and
19 distributed unauthorized recordings of Plaintiffs' Subject Compositions including,
20 but not limited to, the recordings identified in Exhibit B-209. Exhibit B-209 sets
21 forth a non-exhaustive list of specific pirated recordings embodying Subject
22 Compositions that have been reproduced and distributed by Defendants Hasmick
23 Promotions Limited, Orchard, and Pandora without authorization. These Defendants
24 have willfully infringed, and are continuing to infringe, Plaintiffs' copyrights in the
25 Subject Compositions by the methods identified in Exhibit B-209 (or have
26 authorized such activity) without obtaining authorization to do so.

1 **Two Hundred Tenth Claim – Copyright Infringement**
2 **Against Digital Gramophone, Orchard, and Pandora**

3 571. Plaintiffs repeat each and every allegation of the Complaint.

4 572. As a separate specific course of infringement, Defendants Digital
5 Gramophone, Orchard, and Pandora have unlawfully reproduced and distributed
6 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
7 limited to, the recordings identified in Exhibit B-210. Exhibit B-210 sets forth a
8 non-exhaustive list of specific pirated recordings embodying Subject Compositions
9 that have been reproduced and distributed by Defendants Digital Gramophone,
10 Orchard, and Pandora without authorization. These Defendants have willfully
11 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
12 Compositions by the methods identified in Exhibit B-210 (or have authorized such
13 activity) without obtaining authorization to do so.

14 **Two Hundred Eleventh Claim – Copyright Infringement**
15 **Against Plenty Jazz Records, Orchard, and Pandora**

16 573. Plaintiffs repeat each and every allegation of the Complaint.

17 574. As a separate specific course of infringement, Defendants Plenty Jazz
18 Records, Orchard, and Pandora have unlawfully reproduced and distributed
19 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
20 limited to, the recordings identified in Exhibit B-211. Exhibit B-211 sets forth a
21 non-exhaustive list of specific pirated recordings embodying Subject Compositions
22 that have been reproduced and distributed by Defendants Plenty Jazz Records,
23 Orchard, and Pandora without authorization. These Defendants have willfully
24 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
25 Compositions by the methods identified in Exhibit B-211 (or have authorized such
26 activity) without obtaining authorization to do so.

**Two Hundred Twelfth Claim – Copyright Infringement
Against Broken Audio, Ingrooves, and Pandora**

575. Plaintiffs repeat each and every allegation of the Complaint.

576. As a separate specific course of infringement, Defendants Broken Audio, Ingrooves, and Pandora have unlawfully reproduced and distributed unauthorized recordings of Plaintiffs' Subject Compositions including, but not limited to, the recordings identified in Exhibit B-212. Exhibit B-212 sets forth a non-exhaustive list of specific pirated recordings embodying Subject Compositions that have been reproduced and distributed by Defendants Broken Audio, Ingrooves, and Pandora without authorization. These Defendants have willfully infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the methods identified in Exhibit B-212 (or have authorized such activity) without obtaining authorization to do so.

**Two Hundred Thirteenth Claim – Copyright Infringement
Against Railroad, Orchard, and Pandora**

577. Plaintiffs repeat each and every allegation of the Complaint.

578. As a separate specific course of infringement, Defendants Railroad, Orchard, and Pandora have unlawfully reproduced and distributed unauthorized recordings of Plaintiffs' Subject Compositions including, but not limited to, the recordings identified in Exhibit B-213. Exhibit B-213 sets forth a non-exhaustive list of specific pirated recordings embodying Subject Compositions that have been reproduced and distributed by Defendants Railroad, Orchard, and Pandora without authorization. These Defendants have willfully infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the methods identified in Exhibit B-213 (or have authorized such activity) without obtaining authorization to do so.

1 **Two Hundred Fourteenth Claim – Copyright Infringement**
 2 **Against Primephonic USA Inc., Naxos of America, and Pandora**

3 579. Plaintiffs repeat each and every allegation of the Complaint.

4 580. As a separate specific course of infringement, Defendants Primephonic
 5 USA Inc., Naxos of America, and Pandora have unlawfully reproduced and
 6 distributed unauthorized recordings of Plaintiffs' Subject Compositions including,
 7 but not limited to, the recordings identified in Exhibit B-214. Exhibit B-214 sets
 8 forth a non-exhaustive list of specific pirated recordings embodying Subject
 9 Compositions that have been reproduced and distributed by Defendants
 10 Primephonic USA Inc., Naxos of America, and Pandora without authorization.
 11 These Defendants have willfully infringed, and are continuing to infringe, Plaintiffs'
 12 copyrights in the Subject Compositions by the methods identified in Exhibit B-214
 13 (or have authorized such activity) without obtaining authorization to do so.

14 **Two Hundred Fifteenth Claim – Copyright Infringement**
 15 **Against Shami Media Inc., Believe Digital, and Pandora**

16 581. Plaintiffs repeat each and every allegation of the Complaint.

17 582. As a separate specific course of infringement, Defendants Shami Media
 18 Inc., Believe Digital, and Pandora have unlawfully reproduced and distributed
 19 unauthorized recordings of Plaintiffs' Subject Compositions including, but not
 20 limited to, the recordings identified in Exhibit B-215. Exhibit B-215 sets forth a
 21 non-exhaustive list of specific pirated recordings embodying Subject Compositions
 22 that have been reproduced and distributed by Defendants Shami Media Inc., Believe
 23 Digital, and Pandora without authorization. These Defendants have willfully
 24 infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject
 25 Compositions by the methods identified in Exhibit B-215 (or have authorized such
 26 activity) without obtaining authorization to do so.

**Two Hundred Sixteenth Claim – Copyright Infringement
Against Reloaded Music, Ingrooves, and Pandora**

583. Plaintiffs repeat each and every allegation of the Complaint.

584. As a separate specific course of infringement, Defendants Reloaded Music, Ingrooves, and Pandora have unlawfully reproduced and distributed unauthorized recordings of Plaintiffs' Subject Compositions including, but not limited to, the recordings identified in Exhibit B-216. Exhibit B-216 sets forth a non-exhaustive list of specific pirated recordings embodying Subject Compositions that have been reproduced and distributed by Defendants Reloaded Music, Ingrooves, and Pandora without authorization. These Defendants have willfully infringed, and are continuing to infringe, Plaintiffs' copyrights in the Subject Compositions by the methods identified in Exhibit B-216 (or have authorized such activity) without obtaining authorization to do so.

Demand for Jury Trial

585. Pursuant to Federal Rule of Civil Procedure 38(b), and otherwise, Plaintiffs respectfully demand a trial by jury on all issues.

Prayer for Relief

WHEREFORE, Plaintiffs respectfully request that judgment be entered against Defendants, jointly and severally on each Claim, as follows:

1. A declaration that Defendants have infringed Plaintiffs' copyrights in the Subject Compositions in violation of the Copyright Act;
2. A declaration that each of Defendants' infringements was willful;
3. An award of statutory damages in amounts to be determined by the jury for all infringements involved in the action, with respect to any one work, for which any one infringer is liable individually, or for which any two or more infringers are liable jointly and severally;

1 4. A permanent injunction barring the Defendants from continued
2 infringement of Plaintiffs' copyrights in the Subject Compositions pursuant to 17
3 U.S.C. § 502; and

4 5. Reasonable attorneys' fees and costs of this action, statutory pre-
5 judgment interest, and such other relief as this Court may deem just and proper.

6
7 Dated: Los Angeles, California
8 May 9, 2019

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