

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK**

In the Matter of the Application of, FROZEN MOMENTS,  
LLC,

*Petitioner,*

For an Order pursuant to Section 3102(c) of the Civil  
Practice Law and Rules to compel pre-action disclosure  
from:

UMG RECORDINGS, INC, and SPOTIFY USA INC.,

*Respondents.*

Index No.: 161023/2024

**NOTICE OF WITHDRAWAL  
OF ORDER TO SHOW  
CAUSE AND  
DISCONTINUANCE****TO THE COURT, PLAINTIFF AND ITS ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE THAT** Petitioner and Movant FROZEN MOMENTS, LLC, by its attorneys Willkie Farr & Gallagher LLP, hereby withdraws its Order to Show Cause seeking pre-action disclosure and preservation of certain documents and communications from Respondent UMG RECORDINGS, INC. and pre-action disclosure of certain documents and communications from Respondent SPOTIFY USA INC., with exhibits originally filed in New York Supreme Court on November 25, 2024.

**PLEASE TAKE FURTHER NOTICE** that Petitioner hereby voluntarily discontinues this special proceeding as to all Respondents without costs to any party. Plaintiffs met and conferred with Respondents on January 14, 2025 regarding this filing. Respondent Spotify, which has filed an opposition to the Order to Show Cause, responded that Spotify has no objection to the withdrawal and discontinuance. Respondent UMG, which has not yet filed an opposition to the Order to Show Cause, has reserved its position.

Dated: New York, New York  
January 14, 2025

Respectfully submitted,

By: /s/ Michael J. Gottlieb  
Michael J. Gottlieb  
Meryl C. Governski  
WILLKIE FARR & GALLAGHER LLP  
1875 K Street NW  
Washington, DC 20006  
Tel: (202) 303-1000  
mgottlieb@willkie.com  
mgovernski@willkie.com

M. Annie Houghton-Larsen  
WILLKIE FARR & GALLAGHER LLP  
787 Seventh Avenue  
New York, NY 10019  
Tel: (212) 728-8000  
mhoughton-larsen@willkie.com

TO: **Via NYSCEF**

Attorneys for Respondent UMG RECORDINGS, INC.

Rollin A. Ransom  
SIDLEY AUSTIN LLP  
350 South Grand Avenue  
Los Angeles, CA 90071  
Tel: (213) 896-6000  
rransom@sidley.com

Nicholas Crowell  
James R. Horner  
SIDLEY AUSTIN LLP  
787 Seventh Avenue  
New York, NY 10019  
Tel: (212) 839-5300  
ncrowell@sidley.com  
jhorner@sidley.com

Attorney for Respondent SPOTIFY USA, INC.

Jonathan M. Sperling  
COVINGTON & BURLING LLP

The New York Times Building  
620 Eighth Avenue  
New York, NY 10018-1405  
Tel: (212) 841-1000  
jsperling@cov.com