

JUDGE TORRES

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ARISTA MUSIC, ARISTA MUSIC LLC,  
LAFACE RECORDS LLC, SONY MUSIC  
ENTERTAINMENT, SONY MUSIC  
ENTERTAINMENT US LATIN LLC, AND  
ZOMBA RECORDING LLC,

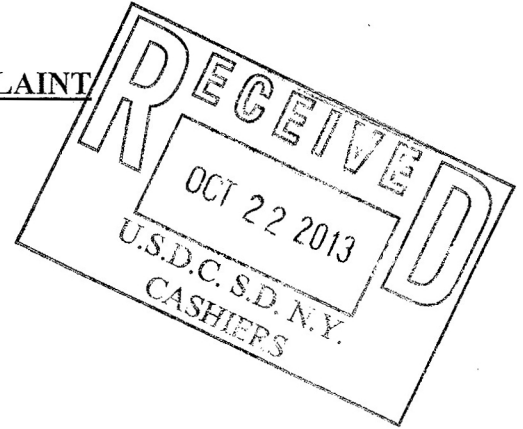
*Plaintiffs,*

v.

UNITED AIRLINES, INC.; INFLIGHT  
PRODUCTIONS LTD.; and RIGHTSCOM  
LTD.,

*Defendants.*

COMPLAINT



Plaintiffs Arista Music, Arista Music LLC, LaFace Records LLC, Sony Music Entertainment, Sony Music Entertainment US Latin LLC, and Zomba Recording LLC (collectively referred to as “Sony Music” or “Plaintiffs”), by and through their undersigned attorneys, allege as follows:

**NATURE OF THE ACTION**

1. This case relates to the ongoing and willful infringement of copyrighted sound recordings and music videos through an interactive, on-demand, in-flight music service, as well as a linear pre-programmed music service, operated by an airline company for the entertainment of its passengers without authorization from or compensation to the owners of the recordings and music videos that are reproduced and performed by the service.

2. Defendant United Airlines, Inc. (“United”) and its predecessor companies, working in concert with Defendants Inflight Productions Ltd. (“Inflight Productions”) and

Rightscom Ltd. (“Rightscom”), (collectively “Defendants”) operate an interactive, on-demand, in-flight music service and a linear pre-programmed music service for the entertainment of passengers on United Airlines and/or Continental Airlines.

3. Upon information and belief, in order to create these in-flight music services, Defendants have, without authority, duplicated Plaintiffs’ copyrighted sound recordings and music videos. These infringing copies are then installed on servers located on board aircraft owned or operated by United or its predecessors, where they are used to transmit performances of Plaintiffs’ copyrighted sound recordings and music videos to passengers.

4. Defendants do not have any license or other form of authorization from Plaintiffs to reproduce or publicly perform any of Plaintiffs’ copyrighted sound recordings and music videos.

5. As a result of the foregoing, Defendants are liable for the infringement of Plaintiffs’ copyrights, either because they have directly engaged in infringing activities themselves or because one or more of them is secondarily liable for infringing activities undertaken by others.

6. The harm to Plaintiffs and their artists, who invest millions of dollars and enormous amounts of time and creative energy to produce and exploit the copyrighted works infringed by Defendants is both manifest and irreparable.

#### **THE PARTIES**

7. Plaintiff Arista Music is a New York partnership with its principal place of business in New York, New York.

8. Plaintiff Arista Records LLC is a Delaware limited liability company with its principal place of business in New York, New York.

9. Plaintiff LaFace Records LLC is a Delaware limited liability company with its principal place of business in New York, New York.

10. Plaintiff Sony Music Entertainment is a Delaware partnership with its principal place of business and headquarters in New York, New York.

11. Plaintiff Sony Music Entertainment US Latin LLC is a Delaware limited liability company with its principal place of business and headquarters in Coconut Grove, Florida.

12. Plaintiff Zomba Recording LLC is a Delaware limited liability company with its principal place of business in New York, New York.

13. Plaintiffs are among the largest and most respected record companies in the music business. Plaintiffs are the owners or exclusive United States licensees of sound recordings and music videos containing the performances of some of the most popular and successful recording artists of all-time, including Britney Spears, Carrie Underwood, Justin Timberlake, Kenny Chesney, Michael Jackson, and Paul Simon, to name just a few. Plaintiffs have invested and continue to invest significant money, time, effort, and creative talent to create, promote, sell, and license their sound recordings and music videos.

14. Plaintiffs own the copyrights and/or exclusive rights under the U.S. Copyright Act to exploit an extensive catalogue of popular sound recordings and music videos, including but not limited to those recordings listed in **Exhibit A**, attached hereto. Plaintiffs further own or possess exclusive rights to sound recordings that were initially “fixed” prior to February 15,

1972 (the "Pre-1972 Works") and that are therefore subject to protection under state law, including those recordings listed in **Exhibit B**, attached hereto.

15. Plaintiffs sell, distribute and/or license their sound recordings and music videos for distribution in the form of CDs, DVDs, or other tangible media throughout the United States, including in New York. Plaintiffs also sell, distribute and/or license their sound recordings and music videos in the form of digital audio files through authorized Internet services, including iTunes, MySpace, Rhapsody, and Spotify, as well as directly to consumers.

16. Defendant United is a Delaware corporation with its principal place of business in Chicago, Illinois. United is registered to do business and maintains offices and business operations in New York. On March 31, 2013, after a merger process beginning in 2010, United Airlines, Inc. was officially merged with Continental Airlines, Inc. to form one legal entity, which is now named United Airlines, Inc. As a result of that merger, United is the successor to all the rights and liabilities of its predecessor corporations that previously operated United Airlines and Continental Airlines, and it continues to operate the combined airline under the United name.

17. Defendant Inflight Productions is a company based in London, United Kingdom, and is a subsidiary of Advanced Inflight Alliance AG. Inflight Productions maintains offices throughout the world including in Los Angeles, California. Inflight Productions has created audio programs and managed the provision of musical content for airlines around the world, including for United Airlines and Continental Airlines.

18. Defendant Rightscom is a company based in London, United Kingdom. Rightscom is a consultancy specializing in rights management issues, both at the commercial and

technical level. Rightscom has been retained by Inflight Productions to manage Inflight Productions' copyright obligations around the world, including for United Airlines and Continental Airlines.

### **JURISDICTION AND VENUE**

19. This is a civil action asserting claims of copyright infringement under the copyright laws of the United States. Accordingly, the Court has jurisdiction under 17 U.S.C. § 101 *et seq.*; 28 U.S.C. § 1331 (federal question jurisdiction); and 28 U.S.C. § 1338(a) (jurisdiction over copyright actions). The Court has supplemental jurisdiction over Plaintiffs' New York state law claims under 28 U.S.C. § 1367 (supplemental jurisdiction).

20. Personal jurisdiction over Defendants is proper. First, Defendants engage in continuous and systematic business activities in New York. Second, Defendants transact business in New York, and contract to supply goods and services in New York in connection with the matters giving rise to this suit. Third, Defendants commit infringing acts outside of New York causing injury to Plaintiffs in New York. In connection therewith, Defendants regularly do or solicit business in New York causing injury to Plaintiffs in New York, and/or derive substantial revenue from goods used or services rendered in New York, and/or expect or reasonably should expect their infringing conduct to have consequences in New York, and derive substantial revenue from interstate commerce.

21. Venue in this District is proper under 28 U.S.C. § 1391(b) and/or 28 U.S.C. § 1400(a). Upon information and belief, a substantial part of the acts of the infringement complained of herein occurs or has occurred in this District. Further, Plaintiffs have their principal place of business in New York and in this District. Accordingly, Plaintiffs have been

injured in New York as a result of Defendants' infringing conduct.

### DEFENDANTS' INFRINGING CONDUCT

22. Plaintiffs repeat and reallege every allegation contained in paragraphs 1 through 21 as if fully set forth herein.

23. Defendants offer an interactive, on-demand, in-flight music service, as well as a linear pre-programmed music service, to passengers of United Airlines and/or Continental Airlines. These in-flight music services employ unauthorized reproductions of Plaintiffs' sound recordings which are installed in servers located within United/Continental aircraft and thereafter used to transmit performances of Plaintiffs' sound recordings to United/Continental in-flight passengers either as a pre-programmed package or pursuant to the direct requests of those passengers.

24. Upon information and belief, Defendants have also been making Plaintiffs' copyrighted music videos available to passengers of United Airlines and/or Continental Airlines as part of these same music services. Although Plaintiffs have confirmed that Defendants have been copying and performing these music videos, Plaintiffs have not yet been provided with the titles of the infringed music videos, but will obtain them during discovery.

25. Initially, Plaintiffs were contacted by a representative from Defendant Rightscom, who explained that he had been retained by Defendant Inflight Productions, who in turn had been retained by various airline companies—including United and Continental—for the provision of in-flight musical content. The representative candidly acknowledged that Rightscom's and Inflight's provision of musical content for airlines "involves the reproduction of copyright[ed] musical works and sound recordings."

26. Critically, the representative further acknowledged that “it is going to be necessary for Inflight [through Rightscom] to contact the labels individually to put the necessary licenses in place, and I am contacting you to do so with Sony Music.”

27. From the time that Defendants acknowledged their need to obtain authorization from Plaintiffs for their use of Plaintiffs’ copyrighted sound recordings until the filing of this action, Plaintiffs and Defendants have been in communication relating to that issue. However, Plaintiffs never licensed or otherwise authorized Defendants’ use of the recordings. Nonetheless, during this entire period, Defendants have continued to offer their customers unlicensed access to Plaintiffs’ copyrighted works.

28. More recently, Sony Music learned about the existence of the interactive, on-demand, in-flight music service which involves the making of unauthorized reproductions and the transmission of performances of Plaintiffs’ copyrighted sound recordings and music videos on demand without any license, agreement, or other form of authorization from Plaintiffs.

29. Upon information and belief, Defendants have reproduced and performed thousands of Plaintiffs’ copyrighted sound recordings and music videos without a license or any other form of authorization from Plaintiffs. Non-exhaustive lists of Plaintiffs’ sound recordings that have been infringed by the Defendants are attached hereto as **Exhibit A** and **Exhibit B**. Plaintiffs note that their investigation into those sound recordings that have been infringed by Defendants is ongoing.

30. Defendants’ use of these recordings and music videos is a blatant violation of Plaintiffs’ rights under federal copyright law or New York state law, as applicable.

**FIRST CLAIM FOR RELIEF**

**Infringement of Plaintiffs' Rights under the U.S. Copyright Act**

31. Plaintiffs repeat and reallege every allegation contained in paragraphs 1 through 30 as if fully set forth herein.

32. Without authorization, Defendants are making and/or aiding, encouraging, enabling, inducing, causing, materially contributing to, benefitting financially from (with the right and ability to control), and/or otherwise facilitating the making of unauthorized reproductions of Plaintiffs' copyrighted sound recordings and music videos in violation of 17 U.S.C. §§ 106(1) and 501.

33. Without authorization, Defendants are publicly performing and/or aiding, encouraging, enabling, inducing, causing, materially contributing to, benefitting financially from (with the right and ability to control), or otherwise facilitating the public performance of Plaintiffs' copyrighted sound recordings and music videos in violation of 17 U.S.C. §§ 106(1) and 501.

34. Defendants' infringement of Plaintiffs' sound recordings includes but is not limited to the representative list of copyrighted sound recordings listed in **Exhibit A** hereto.

35. Defendants' acts of infringement are knowing, willful and intentional, in disregard of and indifference to Plaintiffs' rights.

36. As a direct and proximate result of Defendants' infringement of Plaintiffs' copyrights and exclusive rights under copyright, Plaintiffs are entitled to maximum statutory damages, pursuant to 17 U.S.C. § 504(c), in the amount of \$150,000 with respect to each work



infringed, or such other amounts as may be proper under 17 U.S.C. § 504(c). Alternatively, at Plaintiffs' election, pursuant to 17 U.S.C. § 504(b), Plaintiffs are entitled to their actual damages, including Defendants' profits from the infringement, as will be proven at trial.

37. Defendants' conduct is causing and, unless enjoined by this Court, will continue to cause Plaintiffs great and irreparable injury that cannot be fully compensated or measured in money damages. Plaintiffs have no adequate remedy at law. Accordingly, Plaintiffs are entitled to a preliminary and permanent injunction prohibiting infringement of Plaintiffs' copyrights and exclusive rights under copyright pursuant to 17 U.S.C. § 502.

38. Plaintiffs are entitled to their costs and reasonable attorneys' fees pursuant to 17 U.S.C. § 505.

39. Plaintiffs are further entitled to the impoundment and destruction or other reasonable disposition of infringing copies of Plaintiffs' copyrighted sound recordings and music videos pursuant to 17 U.S.C. § 503.

## **SECOND CLAIM FOR RELIEF**

### **Common-Law Copyright Infringement for Pre-1972 Works**

40. Plaintiffs repeat and reallege every allegation contained in paragraphs 1 through 39 as if fully set forth herein.

41. Plaintiffs' Pre-1972 Works are subject to common-law copyright protection under the law of the State of New York. As the owner of valid common-law copyrights in Pre-1972 Works, Plaintiffs possess the exclusive rights to manufacture, reproduce, perform, sell, distribute, and otherwise exploit their Pre-1972 Works.

42. Without authorization, Defendants are reproducing and performing, or benefitting financially from, aiding, encouraging, enabling, inducing, causing, materially contributing to, or otherwise facilitating the reproduction and performance, of Plaintiffs' copyrighted sound recordings in violation of the law of the State of New York, including but not limited to the representative list of sound recordings listed in **Exhibit B** hereto.

43. As a direct and proximate result of Defendants' knowing, willful and intentional copyright infringement, Plaintiffs are entitled to compensatory damages for the infringement of Plaintiffs' copyrighted Works, including but not limited to the representative list of copyrighted sound recordings listed in **Exhibit B** hereto, in such amounts as will be proven at trial, as well as punitive damages.

44. Defendants' conduct is causing and, unless enjoined by this Court, will continue to cause Plaintiffs great and irreparable injury that cannot fully be compensated or measured in money damages. Plaintiffs have no adequate remedy at law. Accordingly, Plaintiffs are entitled to preliminary and permanent injunctive relief prohibiting Defendants from further violating their rights in their Pre-1972 Works.

### **THIRD CLAIM FOR RELIEF**

#### **Unfair Competition as to Pre-1972 Works**

45. Plaintiffs repeat and reallege every allegation contained in paragraphs 1 through 44 as if fully set forth herein.

46. Plaintiffs possess exclusive ownership interests in and to their Pre-1972 Works and are engaged in the business of selling, distributing, and otherwise commercially exploiting their Pre-1972 Works, and licensing others to do the same. Plaintiffs have made a substantial

investment of money, creative talents, and other resources in order to develop, market, promote, and commercially exploit their sound recordings.

47. Through the conduct described above, Defendants are violating Plaintiffs' rights in their Pre-1972 Works, including but not limited to those recordings listed in **Exhibit B** hereto, and are guilty of unfair competition under the common law of the State of New York. By reproducing, performing or otherwise commercially exploiting the Pre-1972 Works, or benefitting financially from, aiding, encouraging, enabling, inducing, causing, materially contributing to, or otherwise facilitating the unauthorized reproduction, performance or commercial exploitation of the Pre-1972 Works, Defendants compete directly with Plaintiffs and their lawful licensees, and further take advantage of and undermine Plaintiffs' substantial creative and financial investment in their Pre-1972 Works. Defendants are knowingly, willfully, and intentionally appropriating Plaintiffs' rights to their Pre-1972 Works. As a direct and proximate result of Defendants' unlawful conduct, Plaintiffs are entitled to compensatory damages in such amounts as will be proven at trial, as well as punitive damages.

48. Defendants' conduct is causing and, unless enjoined by this Court, will continue to cause Plaintiffs great and irreparable injury that cannot fully be compensated or measured in money damages. Plaintiffs have no adequate remedy at law and are entitled to preliminary and permanent injunctive relief prohibiting Defendants from further violating their rights in the Pre-1972 Works.

#### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs demand a jury trial and pray for judgment against Defendants as follows:

1. For a preliminary and permanent injunction enjoining Defendants and Defendants' agents, servants, employees, officers, attorneys, successors, licensees, partners, and assigns, and all persons acting in concert or participation with each or any of them, from directly infringing, and/or benefitting financially from, aiding, encouraging, enabling, inducing, causing, materially contributing to, or otherwise facilitating the infringement of, any of Plaintiffs' copyrights or exclusive rights protected by the Copyright Act or common law, whether now in existence or hereafter created;

2. For the impoundment and destruction or other reasonable disposition of infringing copies of Plaintiffs' copyrighted sound recordings and music videos;

3. For Count 1, all damages to which Plaintiffs may be entitled, including Defendants' profits, in such amounts as may be found, or, in the alternative and at Plaintiffs' election, for statutory damages in the maximum amount allowed by law;

4. For Counts 2 and 3, compensatory damages in such amounts as will be proven at trial, as well as punitive damages;

5. For Plaintiffs' costs, including and reasonable attorneys' fees, pursuant to 17 U.S.C. § 504;

6. For prejudgment interest according to law; and

7. For such further relief as the Court may deem just and proper.

Respectfully submitted,

By: Andrew H. Bart

Andrew H. Bart  
Alison I. Stein  
JENNER & BLOCK LLP  
919 Third Avenue  
37th Floor  
New York, NY 10022  
tel. (212) 891-1600  
fax (212) 891-1699

*Attorneys for Plaintiffs*

Dated: New York, New York  
October 22, 2013

# Exhibit A

## Exhibit A:

Representative List of Post-1971 Works at Issue Owned by Arista Music, Arista Records LLC, LaFace Records LLC, Sony Music Entertainment, Sony Music Entertainment U.S. Latin LLC, and Zomba Recording LLC.

Artist	Title	SR #
Chris Botti	Prelude No. 20 in C Minor	SR0000700153
Chris Botti	Per te (For You)	SR0000700153
Chris Botti	En Aranjuez Con Tu Amor	SR0000700153
Chris Botti	You Are Not Alone	SR0000700153
Chris Botti	Losing You	SR0000700153
Chris Botti	Tango Suite	SR0000700153
Chris Botti	Setembro	SR0000700153
Chris Botti	Oblivion	SR0000700153
Chris Botti	Sevdah	SR0000700153
Chris Botti	Summertime	SR0000700153
Chris Botti	Contigo en la Distancia	SR0000700153
Chris Botti	Over the Rainbow	SR0000700153
Chris Botti	What a Wonderful World	SR0000700153
Chris Botti	Not Gonna Fall This Time	SR0000681878
Linda Eder	No Finer Man	SR0000681878
Linda Eder	Ordinary People	SR0000681878
Linda Eder	Heat of The Night	SR0000681878
Linda Eder	What Did You See Inside The Stars?	SR0000681878
Linda Eder	Now	SR0000681878
Linda Eder	The Mad Hatter	SR0000681878
Linda Eder	A Woman In His Arms	SR0000681878
Linda Eder	Good Bye	SR0000681878
Linda Eder	What's Never Been Done Before	SR0000681878
Linda Eder	More Than Heav...	SR0000681878
Linda Eder	Living In The Shadows	SR0000681878
Linda Eder	Please Don't Make Me Love You Lyrics	SR0000681878
Linda Eder	First Time	SR0000681878
Linda Eder	Sweet Song Of Life	SR0000681878
Linda Eder	Attaboy	SR0000697849
Yo Yo Ma, Stuart Duncan, Edgar Meyer	Quarter Chicken Dark	SR0000697849
Yo Yo Ma, Stuart Duncan, Edgar Meyer	Helping Hand	SR0000697849
Yo Yo Ma, Stuart Duncan, Edgar Meyer	Where's My Bow?	SR0000697849
Yo Yo Ma, Stuart Duncan, Edgar Meyer	Here and Heaven	SR0000697849
Yo Yo Ma, Stuart Duncan, Edgar Meyer	Franz and The Eagle	SR0000697849
Yo Yo Ma, Stuart Duncan, Edgar Meyer	Less Is Moi	SR0000697849
Yo Yo Ma, Stuart Duncan, Edgar Meyer	Hill Justice	SR0000697849
Yo Yo Ma, Stuart Duncan, Edgar Meyer	No One But You	SR0000697849
Yo Yo Ma, Stuart Duncan, Edgar Meyer	Thirteen Eight	SR0000697849
Yo Yo Ma, Stuart Duncan, Edgar Meyer	Goat Rodeo	SR0000697849
Alabama	Roll On	SR0000052706
Brad Paisley	Anything Like Me	SR0000639650
Brad Paisley	Remind Me	SR0000680360
Carrie Underwood	Mamma's Song	SR0000636273
Chris Young	Voices	SR0000641828
Collin Raye	On the Verge	SR0000213652
Dixie Chicks	Wide Open Spaces	SR0000252000
Dolly Parton	In the Meantime	SR0000679697
George Jones	He Stopped Loving He...	SR0000025646
Kenny Chesney	Somewhere With You	SR0000659735
Kenny Chesney	Seven Days	SR0000659735
Ronnie Dunn	Singer In a Cowboy...	SR0000681910
Sara Evans	Life Without Losing	SR0000674205
Brad Paisley	This Is Country Music	SR0000680360
Brad Paisley	Old Alabama	SR0000680360
Brad Paisley	A Man Don't Have To Die	SR0000680360
Brad Paisley	Camouflage	SR0000680360
Brad Paisley	Remind Me	SR0000680360
Brad Paisley	Working On A Tan	SR0000680360
Brad Paisley	Love Her Like She's Leavin'	SR0000680360
Brad Paisley	One Of Those Lives	SR0000680360
Brad Paisley	Toothbrush	SR0000680360
Brad Paisley	Be The Lake	SR0000680360
Brad Paisley	Eastwood	SR0000680360
Brad Paisley	New Favorite Memory	SR0000680360
Brad Paisley	Don't Drink The Water	SR0000680360
Brad Paisley	I Do Now	SR0000680360
Brad Paisley	Life's Railway To Heaven	SR0000680360
Carrie Underwood	Good Girl	SR0000700157
Carrie Underwood	Blown Away	SR0000700157
Carrie Underwood	Two Black Cadillacs	SR0000700157
Carrie Underwood	See You Again	SR0000700157
Carrie Underwood	Do You Think About Me	SR0000700157
Carrie Underwood	Forever Changed	SR0000700157
Carrie Underwood	Nobody Ever Told You	SR0000700157
Carrie Underwood	One Way Ticket	SR0000700157

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Carrie Underwood	Thank God for Hometowns	SR0000700157
Carrie Underwood	Good in Goodbye	SR0000700157
Carrie Underwood	Leave Love Alone	SR0000700157
Carrie Underwood	Cupid's Got a Shotgun	SR0000700157
Carrie Underwood	Wine After Whiskey	SR0000700157
Carrie Underwood	Who Are You	SR0000700157
Kix Brooks	New to This Town	SR0000709239
Kix Brooks	Moonshine Road	SR0000709239
Kix Brooks	Bring It On Home	SR0000709239
Kix Brooks	There's the Sun	SR0000709239
Kix Brooks	Complete 360	SR0000709239
Kix Brooks	My Baby	SR0000709239
Kix Brooks	Tattoo	SR0000709239
Kix Brooks	In the Right Place	SR0000709239
Kix Brooks	Next to That Woman	SR0000709239
Kix Brooks	Let's Do This Thing	SR0000709239
Kix Brooks	Closin' Time At Home	SR0000709239
Kix Brooks	She Knew I Was a Cowboy	SR0000709239
Ronnie Dunn	Singer In A Cowboy Band	SR0000681910
Ronnie Dunn	I Don't Dance	SR0000681910
Ronnie Dunn	Your Kind Of Love	SR0000681910
Ronnie Dunn	How Far To Waco	SR0000681910
Ronnie Dunn	Once	SR0000681910
Ronnie Dunn	Cost Of Livin'	SR0000681910
Ronnie Dunn	Bleed Red	SR0000681910
Ronnie Dunn	Last Love I'm Tryin'	SR0000681910
Ronnie Dunn	Let The Cowboy Rock	SR0000681910
Ronnie Dunn	I Can't Help Myself	SR0000681910
Ronnie Dunn	I Just Get Lonely	SR0000681910
Ronnie Dunn	Love Owes Me One	SR0000681910
Sara Evans	Desperately	SR0000674205
Sara Evans	A Little Bit Stronger	SR0000674205
Sara Evans	My Heart Can't Tell You No	SR0000674205
Sara Evans	Anywhere	SR0000674205
Sara Evans	Alone	SR0000674205
Sara Evans	Ticket To Ride	SR0000674205
Sara Evans	Life Without Losing	SR0000674205
Sara Evans	What That Drink Cost Me	SR0000674205
Sara Evans	Wildfire	SR0000674205
Sara Evans	Born To Fly (Bluegrass Version)	SR0000674205
Willie Nelson	A Horse Called Music	SR0000111247
Willie Nelson	Roll Me Up	SR0000701456
Willie Nelson	That's All There Is to This Song	SR0000701456
Willie Nelson	No Place to Fly	SR0000701456
Willie Nelson	Every Time He Drinks He Thinks of Her	SR0000701456
Willie Nelson	Come On Up to the House	SR0000701456
Willie Nelson	Hero	SR0000701456
Willie Nelson	My Window Faces the South	SR0000701456
Willie Nelson	The Sound of Your Memory	SR0000701456
Willie Nelson	Cold War With You	SR0000701456
Willie Nelson	Just Breathe	SR0000701456
Willie Nelson	Home In San Antone	SR0000701456
Willie Nelson	Come On Back Jesus	SR0000701456
Willie Nelson	The Scientist	SR0000701456
Olive	You're Not Alone	SR0000241686
Barbra Streisand	The Island	SR0000284184
Celine Dion	Have You Ever Been In Love	SR0000311366
Harry Connick, Jr.	Smile	SR0000636906
James Taylor	Only A Dream In Rio	SR0000068536
James Taylor	How Sweet It Is (To Be Loved By You)	SR0000173201
Paul Simon	You Can Call Me Al	SR0000079610
Quincy Jones	Just Once	SR0000025221
Sade	By Your Side	SR0000298354
Sarah McLachlan	Forgiveness	SR0000661978
Sarah McLachlan	Ice Cream	SR0000200152
Susan Boyle	Wild Horses	SR0000645076
T. Bennett & P. McCartney	The Very Thought...	SR0000396204
Bob Dylan	Tangled Up In Blue	RE0000926712
Bruce Hornsby	The Way It Is	SR0000071024
Bruce Springsteen	Glory Days	SR0000055647
Bruce Springsteen	Prove It All Night	SR0000008335
Cyndi Lauper	Girls Just Wanna...	SR0000050827
Dead or Alive	You Spin Me Rou...	SR0000068224
Hall & Oates	Rich Girl	SR0000016854
Neil Diamond	Forever In Blue Jeans	SR0000006537



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Artist	Title	SR #
Steve Perry	Oh Sherrie	SR000059052
The Allman Brothers	Melissa	SR0000148620
2AM Club	Worry About You	SR0000666589
Adele	Set Fire To The Rain	SR0000673074
Avril Lavigne	Wish You Were Here	SR0000680182
Beyoncé	Countdown	SR0000683948
Beyoncé	Love On Top	SR0000683948
Britney Spears	Criminal	SR0000673693
Chris Brown & Benny Benassi	Beautiful People	SR0000679366
John Mayer & Taylor Swift	Half of My...	SR0000650569
Ke\$ha	We R Who We R	SR0000670406
Mike Posner	Please Don't Go	SR0000657938
Pink	Raise Your Glass	SR0000671699
Sara Bareilles	King of Anything	SR0000661968
Usher	DJ Got Us Fallin' In Love	SR0000661970
Alicia Keys	No One	SR0000627148
Alicia Keys	You Don't Know My Name	SR0000346869
Beyoncé	Party (feat. André 3000)	SR0000709270
Blu Cantrell	Hit 'Em Up Style (Oops!)	SR0000300390
Chris Brown (Feat. Tyga & Kevin McCall)	Deuces	SR0000679366
Jazmine Sullivan	10 Seconds	SR0000673076
Jennifer Hudson	No One Gonna Love You	SR0000674220
Jennifer Lopez	I'm Real	SR0000293297
Joe	Stutter	SR0000284505
John Legend	Save Room	SR0000388476
Justin Timberlake	Like I Love You	SR0000321888
Mario	Let Me Love You	SR0000361595 (Single)
Miguel (Feat. J. Cole)	All I Want Is You	SR0000673073
Monica	Love All Over Me	SR0000651485
R. Kelly	If I Could Turn Back The Hands Of...	SR0000260868
Sade	Smooth Operator	SR0000069105
Toni Braxton	Un-Break My Heart	SR0000233892
Usher	Lay You Down	SR0000652023
Usher	Bad Girl	SR0000354784
Usher (Feat. Jay Z)	Hot Tottie	SR0000652023
Foo Fighters	Walk	SR0000677691
Incubus	If Not Now, When?	SR0000692154
Kings of Leon	Radioactive	SR0000666972/SR0000670217 (Deluxe Edition)
Kings of Leon	Pyro	SR0000666972
The Strokes	Under Cover of Darkness	SR0000678099
Three Days Grace	World So Cold	SR0000641798
Adam Lambert	Trespassing	SR0000700551
Adam Lambert	Cuckoo	SR0000700551
Adam Lambert	Shady	SR0000700551
Adam Lambert	Never Close Our Eyes	SR0000700551
Adam Lambert	Kickin' In	SR0000700551
Adam Lambert	Naked Love	SR0000700551
Adam Lambert	Pop That Lock	SR0000700551
Adam Lambert	Better Than I Know Myself	SR0000700551
Adam Lambert	Broken English	SR0000700551
Adam Lambert	Underneath	SR0000700551
Adam Lambert	Chokehold	SR0000700551
Adam Lambert	Outlaws of Love	SR0000700551
Adele	Rolling In The Deep	SR0000673074
Adele	Rumour Has It	SR0000673074
Adele	Turning Tables	SR0000673074
Adele	Don't You Remember	SR0000673074
Adele	Set Fire To The Rain	SR0000673074
Adele	He Won't Go	SR0000673074
Adele	Take It All	SR0000673074
Adele	I'll Be Waiting	SR0000673074
Adele	One And Only	SR0000673074
Adele	Lovesong	SR0000673074
Adele	Someone Like You	SR0000673074
Band of Horses	Knock Knock	SR0000722770
Band of Horses	How to Live	SR0000722770
Band of Horses	Slow Cruel Hands of Time	SR0000722770
Band of Horses	A Little Biblical	SR0000722770
Band of Horses	Shut-in Tourist	SR0000722770
Band of Horses	Dumpster World	SR0000722770
Band of Horses	Electric Music	SR0000722770
Band of Horses	Everything's Gonna Be Undone	SR0000722770
Band of Horses	Feud	SR0000722770
Band of Horses	Long Vows	SR0000722770

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Artist	Title	SR.#
Band of Horses	Heartbreak On the 101	SR0000722770
Band of Horses	Ego Nightmare	SR0000722770
Beyonce	1 Plus 1	SR0000683948
Beyonce	I Care	SR0000683948
Beyonce	I Miss You	SR0000683948
Beyonce	Best Thing I Never Had	SR0000683948
Beyonce	Party	SR0000683948
Beyonce	Rather Die Young	SR0000683948
Beyonce	Start Over	SR0000683948
Beyonce	Love On Top	SR0000683948
Beyonce	Countdown	SR0000683948
Beyonce	End Of Time	SR0000683948
Beyonce	I Was Here	SR0000683948
Beyonce	Run The World (Girls)	SR0000683948
Bob Dylan	Duquesne Whistle	SR0000713461
Bob Dylan	Soon After Midnight	SR0000713461
Bob Dylan	Narrow Way	SR0000713461
Bob Dylan	Long and Wasted Years	SR0000713461
Bob Dylan	Pay In Blood	SR0000713461
Bob Dylan	Scarlet Town	SR0000713461
Bob Dylan	Early Roman Kings	SR0000713461
Bob Dylan	Tin Angel	SR0000713461
Bob Dylan	Tempest	SR0000713461
Bob Dylan	Roll On John	SR0000713461
Bruce Springsteen	Born In The USA	SR0000055647
Bruce Springsteen	Cover Me	SR0000055647
Bruce Springsteen	Darlington County	SR0000055647
Bruce Springsteen	Working On The Highway	SR0000055647
Bruce Springsteen	Downbound Train	SR0000055647
Bruce Springsteen	I'm On Fire	SR0000055647
Bruce Springsteen	No Surrender	SR0000055647
Bruce Springsteen	Bobby Jean	SR0000055647
Bruce Springsteen	I'm Goin' Down	SR0000055647
Bruce Springsteen	Glory Days	SR0000055647
Bruce Springsteen	Dancing In The Dark	SR0000055647
Bruce Springsteen	My Hometown	SR0000055647
Bruce Springsteen	We Take Care Of Our Own	SR0000705192
Bruce Springsteen	Easy Money	SR0000705192
Bruce Springsteen	Shackled and Drawn	SR0000705192
Bruce Springsteen	Jack of All Trades	SR0000705192
Bruce Springsteen	Death to My Hometown	SR0000705192
Bruce Springsteen	This Depression	SR0000705192
Bruce Springsteen	Wrecking Ball	SR0000705192
Bruce Springsteen	You've Got It	SR0000705192
Bruce Springsteen	Rocky Ground	SR0000705192
Bruce Springsteen	Land of Hope And Dreams	SR0000705192
Bruce Springsteen	We Are Alive	SR0000705192
Bruce Springsteen	Swallowed Up (In The Belly Of The...)	SR0000705192
Bruce Springsteen	American Land	SR0000705192
Foo Fighters	Bridge Burning	SR0000677691
Foo Fighters	Rope	SR0000677691
Foo Fighters	Dear Rosemary	SR0000677691
Foo Fighters	White Limo	SR0000677691
Foo Fighters	Arlandria	SR0000677691
Foo Fighters	These Days	SR0000677691
Foo Fighters	Back & Forth	SR0000677691
Foo Fighters	A Matter Of Time	SR0000677691
Foo Fighters	Miss The Misery	SR0000677691
Foo Fighters	I Should Have Known	SR0000677691
Foo Fighters	Walk	SR0000677691
Glee Cast	Don't Stop Believin'	SR0000685895
Glee Cast	Dog Days Are Over	SR0000685895
Glee Cast	Sing	SR0000685895
Glee Cast	I'm A Slave 4 U	SR0000685895
Glee Cast	Fat Bottomed Girls	SR0000685895
Glee Cast	I Want To Hold Your Hand	SR0000685895
Glee Cast	Ain't No Way	SR0000685895
Glee Cast	P.Y.T. (Pretty Young Thing)	SR0000685895
Glee Cast	Born This Way	SR0000685895
Glee Cast	Firework	SR0000685895
Glee Cast	Teenage Dream	SR0000685895
Glee Cast	Silly Love Songs	SR0000685895
Glee Cast	Raise Your Glass	SR0000685895
Glee Cast	Happy Days Are Here Again	SR0000685895
Glee Cast	Lucky	SR0000685895

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Representative List of Post-1971 Works at Issue Owned by Arista Music, Arista Records LLC, LaFace Records LLC, Sony Music Entertainment, Sony Music Entertainment U.S. Latin LLC, and Zomba Recording LLC.

Artist	Title	SR#
Glee Cast	River Deep, Mountain High	SR0000685895
Glee Cast	Forget You	SR0000685895
Glee Cast	Don't Rain On My Parade	SR0000685895
Glee Cast	Jessie's Girl	SR0000685895
Glee Cast	Valerie	SR0000685895
Glee Cast	Loser Like Me	SR0000685895
Glee Cast	Safety Dance	SR0000685895
Glee Cast	Somebody To Love	SR0000685895
Glee Cast	You Can't Stop the Beat	SR0000706326
Glee Cast	It's Not Unusual	SR0000706326
Glee Cast	Somewhere	SR0000706326
Glee Cast	Run the World (Girls)	SR0000706326
Glee Cast	Fix You	SR0000706326
Glee Cast	Last Friday Night	SR0000706326
Glee Cast	Uptown Girl	SR0000706326
Glee Cast	Tonight	SR0000706326
Glee Cast	Hot for Teacher	SR0000706326
Glee Cast	Rumor Has It / Someone Like You	SR0000706326
Glee Cast	Girls Just Want to Have Fun	SR0000706326
Glee Cast	Constant Craving	SR0000706326
Glee Cast	ABC	SR0000706326
Glee Cast	Control	SR0000706326
Glee Cast	Man in the Mirror	SR0000706326
Glee Cast	Missing Pieces	SR0000699383
Jack White	Sixteen Saltines	SR0000699383
Jack White	Freedom At 21	SR0000699383
Jack White	Love Interruption	SR0000699383
Jack White	Blunderbuss	SR0000699383
Jack White	Hypocritical Kiss	SR0000699383
Jack White	Weep Themselves To Sleep	SR0000699383
Jack White	I'm Shakin'	SR0000699383
Jack White	Trash Tongue Talker	SR0000699383
Jack White	Hip (Eponymous) Poor Boy	SR0000699383
Jack White	I Guess I Should Go To Sleep	SR0000699383
Jack White	On and On and On	SR0000699383
Jack White	Take Me With You When You Go	SR0000699383
Jack White	No One Gonna Love You	SR0000674220
Jennifer Hudson	I Got This	SR0000674220
Jennifer Hudson	Where You At	SR0000674220
Jennifer Hudson	Angel	SR0000674220
Jennifer Hudson	I Remember Me	SR0000674220
Jennifer Hudson	Gone	SR0000674220
Jennifer Hudson	Everybody Needs Love	SR0000674220
Jennifer Hudson	Why Is It So Hard	SR0000674220
Jennifer Hudson	Don't Look Down	SR0000674220
Jennifer Hudson	Still Here	SR0000674220
Jennifer Hudson	Feeling Good	SR0000674220
Jennifer Hudson	Believe	SR0000674220
John Legend	Hard Times	SR0000674877
John Legend	Compared To What	SR0000674877
John Legend	Wake Up Everybody	SR0000674877
John Legend	Our Generation	SR0000674877
John Legend	Little Ghetto Boy	SR0000674877
John Legend	Little Ghetto	SR0000674877
John Legend	Hang On In There	SR0000674877
John Legend	Humanity	SR0000674877
John Legend	Wholy Holy	SR0000674877
John Legend	I Can't Write Left Handed	SR0000674877
John Legend	I Wish I Knew How It Would Feel To...	SR0000674877
John Legend	Shine	SR0000674877
John Legend	Queen of California	SR0000701446
John Mayer	The Age of Worry	SR0000701446
John Mayer	Shadow Days	SR0000701446
John Mayer	Speak for Me	SR0000701446
John Mayer	Something Like Olivia	SR0000701446
John Mayer	Born and Raised	SR0000701446
John Mayer	If I Ever Get Around to Living	SR0000701446
John Mayer	Love Is a Verb	SR0000701446
John Mayer	Walt Grace's Submarine...	SR0000701446
John Mayer	Whiskey, Whiskey, Whiskey	SR0000701446
John Mayer	A Face to Call Home	SR0000701446
John Mayer	Born and Raised (Reprise)	SR0000701446
John Mayer	Fool to Love You	SR0000701446
Ke\$ha	Cannibal	SR0000670406
Ke\$ha	We R Who We R	SR0000670406



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Artist	Title	SR#
Ke\$ha	Sleazy	SR0000670406
Ke\$ha	Blow	SR0000670406
Ke\$ha	The Harold Song	SR0000670406
Ke\$ha	Crazy Beautiful Life	SR0000670406
Ke\$ha	Grow A Pear	SR0000670406
Ke\$ha	C U Next Tuesday	SR0000670406
Ke\$ha	Animal (Billboard Remix)	SR0000670406
Kelly Clarkson	Mr. Know It All	SR0000693113
Kelly Clarkson	Stronger	SR0000693113
Kelly Clarkson	Dark Side	SR0000693113
Kelly Clarkson	Honestly	SR0000693113
Kelly Clarkson	You Love Me	SR0000693113
Kelly Clarkson	Einstein	SR0000693113
Kelly Clarkson	Standing In Front Of You	SR0000693113
Kelly Clarkson	I Forgive You	SR0000693113
Kelly Clarkson	Hello	SR0000693113
Kelly Clarkson	The War Is Over	SR0000693113
Kelly Clarkson	Let Me Down	SR0000693113
Kelly Clarkson	You Can't Win	SR0000693113
Kelly Clarkson	Breaking Your Own Heart	SR0000693113
Kelly Clarkson	Don't You Wanna Stay	SR0000693113
Kelly Clarkson	Alone	SR0000693113
Kelly Clarkson	Don't Be a Girl About It	SR0000693113
Kelly Clarkson	The Sun Will Rise	SR0000693113
Michael Jackson	Wanna Be Startin' Somethin'	SR0000041965
Michael Jackson	Baby Be Mine	SR0000041965
Michael Jackson	The Girl Is Mine	SR0000042782
Michael Jackson	Thriller	SR0000041965
Michael Jackson	Beat It	SR0000041965
Michael Jackson	Billie Jean	SR0000041965
Michael Jackson	Human Nature	SR0000041965
Michael Jackson	P.Y.T. (Pretty Young Thing)	SR0000041965
Michael Jackson	The Lady In My Life	SR0000041965
Michael Jackson	Interview - Quincy Jones	SR0000041965
Michael Jackson	Someone In The Dark	SR0000041965
Michael Jackson	Interview - Quincy Jones	SR0000041965
Michael Jackson	Billie Jean (Home Demo From 1981)	SR0000041965
Michael Jackson	Interview - Quincy Jones	SR0000041965
Michael Jackson	Interview - Rod Temperton	SR0000041965
Michael Jackson	Interview - Quincy Jones	SR0000041965
Michael Jackson	Voice-Over Session from 'Thriller'	SR0000041965
Michael Jackson	Interview - Rod Temperton	SR0000041965
Michael Jackson	Interview - Quincy Jones	SR0000041965
Michael Jackson	Carousel	SR0000041965
Michael Jackson	Interview - Quincy Jones	SR0000041965
Monica	New Life (Intro)	SR0000700530
Monica	It All Belongs to Me	SR0000700530
Monica	Daddy's Good Girl	SR0000700530
Monica	Man Who Has Everything	SR0000700530
Monica	Big Mistake	SR0000700530
Monica	Take a Chance	SR0000700530
Monica	Without You	SR0000700530
Monica	Until It's Gone	SR0000700530
Monica	Amazing	SR0000700530
Monica	Cry	SR0000700530
Monica	Time to Move On	SR0000700530
Monica	New Life (Outro)	SR0000700530
One Direction	What Makes You Beautiful	SR0000703645
One Direction	Gotta Be You	SR0000703645
One Direction	One Thing	SR0000703645
One Direction	More Than This	SR0000703645
One Direction	Up All Night	SR0000703645
One Direction	I Wish	SR0000703645
One Direction	Tell Me a Lie	SR0000703645
One Direction	Taken	SR0000703645
One Direction	I Want	SR0000703645
One Direction	Everything About You	SR0000703645
One Direction	Same Mistakes	SR0000703645
One Direction	Save You Tonight	SR0000703645
One Direction	Stole My Heart	SR0000703645
Pink	Are We All We Are?	SR0000709056
Pink	Blow Me (One Last Kiss)	SR0000709056
Pink	Try	SR0000709056
Pink	Just Give Me a Reason	SR0000709056
Pink	True Love	SR0000709056

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Representative List of Post-1971 Works at Issue Owned by Arista Music, Arista Records LLC, LaFace Records LLC, Sony Music Entertainment, Sony Music Entertainment U.S. Latin LLC, and Zomba Recording LLC.

Artist	Title	SR #
Pink	How Come You're Not Here?	SR0000709056
Pink	Slut Like You	SR0000709056
Pink	The Truth About Love	SR0000709056
Pink	Beam Me Up	SR0000709056
Pink	Walk of Shame	SR0000709056
Pink	Here Comes the Weekend	SR0000709056
Pink	Where Did the Beat Go?	SR0000709056
Pink	The Great Escape	SR0000709056
Pink	Chaos & Piss	SR0000709056
Pink	Timebomb	SR0000709056
R. Kelly	Love Is	SR0000709052
R. Kelly	Feelin' Single	SR0000709052
R. Kelly	Lady Sunday	SR0000709052
R. Kelly	When a Man Lies	SR0000709052
R. Kelly	Clipped Wings	SR0000709052
R. Kelly	Believe That It's So	SR0000709052
R. Kelly	Fool for You	SR0000709052
R. Kelly	All Rounds On Me	SR0000709052
R. Kelly	Believe In Me	SR0000709052
R. Kelly	Green Light	SR0000709052
R. Kelly	Party Jumpin'	SR0000709052
R. Kelly	Share My Love	SR0000709052
Rita Ora	Facemelt	SR0000713187
Rita Ora	Roc the Life	SR0000713187
Rita Ora	How We Do (Party)	SR0000713187
Rita Ora	Radioactive	SR0000713187
Rita Ora	Shine Ya Light	SR0000713187
Rita Ora	Love and War	SR0000713187
Rita Ora	Uneasy	SR0000713187
Rita Ora	Fall in Love	SR0000713187
Rita Ora	Been Lying	SR0000713187
Rita Ora	Hello, Hi, Goodbye	SR0000713187
Rita Ora	Hot Right Now	SR0000713187
Rita Ora	Crazy Girl	SR0000713187
Rita Ora	Young, Single & Sexy	SR0000713187
Rita Ora	Meet Ya	SR0000713187
Rod Stewart	Long Ago And Far Away	SR0000374867
Rod Stewart	Someone To Watch Over Me	SR0000678020
Rod Stewart	They Can't Take That Away From...	SR0000320530
Rod Stewart	Beyond The Sea	SR0000666032
Rod Stewart	You'll Never Know	SR0000678020
Rod Stewart	Time After Time	SR0000342281
Rod Stewart	I Can't Get Started	SR0000320530
Rod Stewart	The Way You Look Tonight	SR0000320530
Rod Stewart	Bye Bye Blackbird	SR0000666032
Rod Stewart	These Foolish Things	SR0000320530
Rod Stewart	But Not For Me	SR0000361133
Rod Stewart	What A Wonderful World	SR0000361133
Rod Stewart	My Foolish Heart	SR0000666032
Rod Stewart	I'll Be Seeing You	SR0000320530
Shakira	How Do You Do	SR0000402672
Shakira	Illegal	SR0000402672
Shakira	Hips Don't Lie	SR0000402672
Shakira	Animal City	SR0000402672
Shakira	The Day And The Time	SR0000402672
Shakira	Dreams For Plans	SR0000402672
Shakira	Hey You	SR0000402672
Shakira	Your Embrace	SR0000402672
Shakira	Costume Makes The Clown	SR0000402672
Shakira	Something	SR0000402672
Shakira	Timor	SR0000402672
Shakira	La Tortura (Alternate Version)	SR0000402672
Susan Boyle	You Have to Be There	SR0000712482
Susan Boyle	Unchained Melody	SR0000712482
Susan Boyle	Enjoy the Silence	SR0000712482
Susan Boyle	Both Sides Now	SR0000712482
Susan Boyle	Lilac Wine	SR0000712482
Susan Boyle	Mad World	SR0000712482
Susan Boyle	Autumn Leaves	SR0000712482
Susan Boyle	This Will Be The Year	SR0000712482
Susan Boyle	Return	SR0000712482
Susan Boyle	Someone to Watch Over Me	SR0000712482
The Clash	Know Your Rights	SR0000034959
The Clash	Car Jamming	SR0000034959
The Clash	Should I Stay Or Should I Go	SR0000034959

## Exhibit A:

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Artist	Title	SR#
The Clash	Rock The Casbah	SR0000034959
The Clash	Red Angel Dragnet	SR0000034959
The Clash	Straight To Hell	SR0000034959
The Clash	Overpowered By Funk	SR0000034959
The Clash	Atom Tan	SR0000034959
The Clash	Sean Flynn	SR0000034959
The Clash	Ghetto Defendant	SR0000034959
The Clash	Inoculated City	SR0000034959
The Clash	Death Is A Star	SR0000034959
The Script	Good Ol' Days	SR0000710171
The Script	Six Degrees of Separation	SR0000710171
The Script	Hall of Fame	SR0000710171
The Script	If You Could See Me Now	SR0000710171
The Script	Glowing	SR0000710171
The Script	Give the Love Around	SR0000710171
The Script	Broken Arrow	SR0000710171
The Script	Kaleidoscope	SR0000710171
The Script	No Words	SR0000710171
The Script	Millionaires	SR0000710171
The Shins	The Rifle's Spiral	SR0000700158
The Shins	Simple Song	SR0000700158
The Shins	It's Only Life	SR0000700158
The Shins	Bait and Switch	SR0000700158
The Shins	September	SR0000700158
The Shins	No Way Down	SR0000700158
The Shins	For a Fool	SR0000700158
The Shins	Fall of '82	SR0000700158
The Shins	40 Mark Strasse	SR0000700158
The Shins	Port of Morrow	SR0000700158
The Shins	Pariah King	SR0000700158
The Shins	Machu Picchu	SR0000678099
The Strokes	Under Cover Of Darkness	SR0000678099
The Strokes	Two Kinds Of Happiness	SR0000678099
The Strokes	You're So Right	SR0000678099
The Strokes	Taken For A Fool	SR0000678099
The Strokes	Games	SR0000678099
The Strokes	Call Me Back	SR0000678099
The Strokes	Gratification	SR0000678099
The Strokes	Metabolism	SR0000678099
The Strokes	Life Is Simple In The Moonlight	SR0000678099
The Strokes	This'll Be My Year	SR0000700152
Train	Drive By	SR0000700152
Train	Feels Good At First	SR0000700152
Train	Bruises (feat. Ashley Monroe)	SR0000700152
Train	50 Ways to...	SR0000700152
Train	You Can Finally Meet My Mom	SR0000700152
Train	Sing Together	SR0000700152
Train	Mermaid	SR0000700152
Train	California 37	SR0000700152
Train	We Were Made for This	SR0000700152
Train	When the Fog Rolls In	SR0000700152
Train	To Be Loved	SR0000700152
Pitbull	Give Me Everything	SR0000683282/SR0000681904 (Explicit version)
Britney Spears	Till The World Ends	SR0000673693
Hot Chelle Rae	Tonight, Tonight	SR0000677539
Julietta Venegas	Despedida	SR0000643773
Marc Anthony	Abrázame Muy Fuerte	SR0000654928
Noel Schajris	Quien Como Tu	SR0000683937
Noel Schajris	La Incondicional	SR0000683937
Noel Schajris	Báchata Rosa	SR0000683937
Noel Schajris	Quiero Dormir Cansado	SR0000683937
Noel Schajris	A Medio Vivir	SR0000683937
Noel Schajris	Tu Carcel	SR0000683937
Noel Schajris	Te Amo	SR0000683937
Noel Schajris	Lamento Boliviano	SR0000683937
Noel Schajris	Si Tu Supieras	SR0000683937
Noel Schajris	Mi Historia Entre Tus Dedos	SR0000683937
Noel Schajris	Tears In Heaven	SR0000683937
Noel Schajris	Me Va A Extranar	SR0000683937

# Exhibit B

## Exhibit B:

Representative List of Pre-1972 Works at Issue Owned by Arista Music, Arista Records LLC, LaFace Records LLC, Sony Music Entertainment, Sony Music Entertainment U.S. Latin LLC, and Zomba Recording LLC.

Artist	Title
Benny Goodman	How Am I...
Charles Mingus	Mood Indigo
Dave Brubeck	A Fine Romance
Duke Ellington	Satin Doll
Duke Ellington & John Coltrane	In A Sentimental...
Julie London	All Through...
Miles Davis	Stella By Starlight
Vince Guaraldi	Cast Your Fate To...
Aretha Franklin	Little Brown Book
Aretha Franklin	Trouble In Mind
Aretha Franklin	Try A Little Tenderness
Aretha Franklin	It Ain't Necessarily So
Aretha Franklin	How Deep Is The Ocean
Aretha Franklin	Cold, Cold Heart
Aretha Franklin	Love For Sale
Aretha Franklin	How Glad I Am
Aretha Franklin	Skylark
Aretha Franklin	This Bitter Earth
Aretha Franklin	Ac-Cent-Tchu-Ate The Positive
Aretha Franklin	What A Diff'rence A Day Made
Aretha Franklin	Only The Lonely
Aretha Franklin	Rock-A-Bye Your Baby With A Dixie...
Aretha Franklin	God Bless The Child
Aretha Franklin	Say It Isn't So
Aretha Franklin	Are You Sure
Aretha Franklin	That Lucky Old Sun
Carole King	You've Got a Friend
Rosemary Clooney	Tenderly
Sam Cooke	Cupid
Tony Bennett	Best Is Yet To Come
Earth Wind & Fire	Shining Star
Elvis Presley	Suspicious Minds
Perry Como	Wanted
Roy Orbison	Oh Pretty Woman
Santana	Evil Ways
The Guess Who	No Time
The Nolans	I'm In the Mood...
Janis Joplin	Move Over
Janis Joplin	Cry Baby
Janis Joplin	A Woman Left Lonely
Janis Joplin	Half Moon
Janis Joplin	Buried Alive In The Blues
Janis Joplin	My Baby
Janis Joplin	Me And Bobby McGee
Janis Joplin	Mercedes Benz
Janis Joplin	Trust Me
Janis Joplin	Get It While You Can
Janis Joplin	Tell Mama (Live)
Janis Joplin	Little Girl Blue (Live)
Janis Joplin	Try (Just A Little Bit Harder)
Janis Joplin	Cry Baby (Live)
Jimi Hendrix	Purple Haze



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Artist	Title
Jimi Hendrix	Fire
Jimi Hendrix	The Wind Cries Mary
Jimi Hendrix	Hey Joe
Jimi Hendrix	All Along The Watchtower
Jimi Hendrix	Stone Free
Jimi Hendrix	Crosstown Traffic
Jimi Hendrix	Manic Depression
Jimi Hendrix	Little Wing
Jimi Hendrix	If 6 Was 9
Jimi Hendrix	Foxy Lady
Jimi Hendrix	Bold As Love
Jimi Hendrix	Castles Made Of Sand
Jimi Hendrix	Red House
Jimi Hendrix	Voodoo Child (Slight Return)
Jimi Hendrix	Freedom
Jimi Hendrix	Night Bird Flying
Jimi Hendrix	Angel
Jimi Hendrix	Dolly Dagger
Jimi Hendrix	Star Spangled Banner
Santana	Singing Winds, Crying Beasts
Santana	Black Magic Woman / Gypsy...
Santana	Oye Como Va
Santana	Incident At Neshabur
Santana	Se A Cabo
Santana	Mother's Daughter
Santana	Samba Pa Ti
Santana	Hope You're Feeling Better
Santana	El Nicoya
Santana	Se A Cabo (Live)
Santana	Toussaint L'Overture (Live)
Santana	Black Magic Woman / Gypsy...