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16 VEOH NETWORKS, INC.

17 **UNITED STATES DISTRICT COURT**
18 **CENTRAL DISTRICT OF CALIFORNIA**
19 **WESTERN DIVISION**

20 UMG RECORDINGS, INC., *et al.*,) **Case No. CV 07 5744 – AHM (AJWx)**
21 Plaintiffs,)
22 vs.) **Discovery Matter**
23 VEOH NETWORKS, INC. a California) **DECLARATION OF ERIN R.**
24 Corporation, DOES 1-10, inclusive,) **RANAHAN IN SUPPORT OF VEOH**
25 Defendants.) **NETWORKS, INC.'S SUMMARY OF**
26) **DISCOVERY ORDERS IN**
27) **MYSPEACE/GROUPER ACTIONS**
28) **RELEVANT TO CURRENT**
) **DISCOVERY DISPUTES**
)
) Fact Discovery:
) Cut-Off: January 12, 2009
) Pretrial Conference: April 6, 2009
) Trial Date: April 21, 2009

LA:222104.1

**DECLARATION OF ERIN R. RANAHAN IN SUPPORT OF VEOH'S SUMMARY OF DISCOVERY ORDERS
IN MYSPEACE/GROUPER ACTIONS RELEVANT TO CURRENT DISCOVERY DISPUTES**

Case No. CV 07 5744 – AHM (AJWx)

1 I, Erin R. Ranahan, declare as follows:

2 1. I am an attorney at the law firm of Winston & Strawn LLP, attorneys for
3 Defendant Veoh Networks, Inc. ("Veoh") in this matter. I am licensed to practice
4 before the Courts of the State of California and this United States District Court. I
5 have personal knowledge of the matters set forth herein, and if called as a witness,
6 could and would competently testify thereto.

7 2. Attached hereto as Exhibit A is a true and correct copy of the Court's
8 hearing transcript from October 29, 2007 in *UMG Recordings, Inc., et al., v. Grouper*
9 *Networks, et al.*, Case No. 2:06-CV-06561 AHM (AJWx).

10 3. Attached hereto as Exhibit B is a true and correct copy of the Court's
11 hearing transcript from November 5, 2007 in *UMG Recordings, Inc., et al., v.*
12 *MySpace, Inc., et al.*, Case No. CV 06-07361 AHM (AJWx).

13 4. Attached hereto as Exhibit C is a true and correct copy of Order Re:
14 Discovery Disputes entered November 8, 2007 in the *UMG Recordings, Inc., et al., v.*
15 *Grouper Networks, et al.*, Case No. 2:06-CV-06561 AHM (AJWx) (Docket No. 82).

16 5. Attached hereto as Exhibit D is a true and correct copy of Order
17 Regarding Plaintiffs' Motion to Compel Crackle to Provide Further Responses to
18 Interrogatories entered February 25, 2008 in the *UMG Recordings, Inc., et al., v.*
19 *Grouper Networks, et al.*, Case No. 2:06-CV-06561 AHM (AJWx) (Docket No. 122).

20 6. Attached hereto as Exhibit E is a true and correct copy of Order
21 Regarding MySpace, Inc.'s Fourth Motion to Compel Further Responses to Requests
22 for Production and Interrogatories, entered March 17, 2008 in the *UMG Recordings,*
23 *Inc., et al., v. MySpace, Inc., et al.*, Case No. CV 06-07361 AHM (AJWx) (Docket
24 No. 260).

25 7. Attached hereto as Exhibit F is a true and correct copy of Order
26 Regarding MySpace Inc.'s Motion to Compel The Addition of Custodians and Search
27 terms by UMG Recording, Inc. (MySpace's Third Motion to Compel) entered March
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1 24, 2008, in the *UMG Recordings, Inc., et al., v. MySpace, Inc., et al.*, Case No. CV
2 06-07361 AHM (AJWx) (Docket No. 270).

3 8. Attached hereto as Exhibit G is a true and correct copy of Order Re:
4 MySpace's Motion to Compel Discovery Responses entered March 27, 2008, in the
5 *UMG Recordings, Inc., et al., v. MySpace, Inc., et al.*, Case No. CV 06-07361 AHM
6 (AJWx) (Docket No. 173).

7 9. Attached hereto as Exhibit H is a true and correct copy of the Court's
8 hearing transcript from April 22, 2008 in *UMG Recordings, Inc., et al. v. Grouper*
9 *Networks, et al.*, Case No. 2:06-CV-06561 AHM (AJWx).

10 10. Attached hereto as Exhibit I is a true and correct copy of the Court's
11 hearing transcript from August 25, 2008 in this action on the parties respective
12 Motions to Compel.

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15 I declare under penalty of perjury under the laws of the United States of
16 America, the foregoing is true and correct. Executed on September 2, 2008, in Los
17 Angeles, California.

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19 /s/ Erin R. Ranahan
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