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17 Attorneys for Defendant  
18 VEOH NETWORKS, INC.

19 **UNITED STATES DISTRICT COURT**  
20 **CENTRAL DISTRICT OF CALIFORNIA**  
21 **WESTERN DIVISION**

22 UMG RECORDINGS, INC., *et al.*,

23 Plaintiffs,

24 vs.

25 VEOH NETWORKS, INC. a California  
26 Corporation, *et al.*,

27 Defendants.

28 **Case No. CV 07 5744 – AHM (AJWx)**

Discovery Matter

**JOINT STIPULATION FOR NEW  
PARTIES TO BE BOUND BY  
PROTECTIVE ORDER**

**STIPULATION**

The parties to the above entitled action, by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS on August 22, 2008, the Court granted Plaintiffs' motion to file a First Amended Complaint naming additional defendants, Shelter Capital Partners, LLC; Shelter Venture Fund, L.P.; The Tornante Company, LLC, Spark Capital, LLC and Spark Capital, L.P. (the "Investor Defendants"); and

WHEREAS the First Amended Complaint naming the Investor Defendants was filed on August 26, 2008.

NOW THEREFORE, the parties, by and through their respective counsel of record, hereby stipulate that the Investor Defendants will be bound by the current governing Interim Protective Order, entered by this Court on May 21, 2008 (Docket 43);

The parties likewise stipulate that the Investor Defendants will be bound by the [Proposed] Protective Order submitted to the Court on July 25, 2008 (Docket 91-2) in the event that the Court enters such order;

The Investor Defendants stipulate to be bound by these orders in order to facilitate disclosure of information, including materials filed under seal in support of Plaintiff's motion for partial summary judgment filed on September 5, 2008. This stipulation shall be without prejudice to any subsequent request for modification of either the Interim Protective Order or the [Proposed] Protective Order submitted to the Court on July 25, 2008.

IT IS SO STIPULATED.

Dated: September 10, 2008

**WINSTON & STRAWN LLP**

By /s/ Erin R. Ranahan  
Jennifer A. Golinveaux  
Erin R. Ranahan  
Attorneys for Defendant  
VEOH NETWORKS, INC.

1 Dated: September 10, 2008

**KULIK, GOTTESMAN, MOUTON &  
SIEGEL, LLP**

2  
3 By /s/ Alisa S. Edelson (w/permission)  
Alisa S. Edelson  
4 Attorney for Defendant  
THE TORNANTE COMPANY, LLC

5 Dated: September 10, 2008

**HELLER EHRMAN LLP**

6  
7 By /s/ Annette L. Hurst (w/permission)  
Annette L. Hurst  
8 Attorney for Defendants  
SHELTER CAPITAL PARTNERS, LLC  
9 and SHELTER VENTURE FUND, LP

10 Dated: September 10, 2008

**WILMER CUTLER PICKERING HALE  
AND DORR LLP**

11  
12 By /s/ Maria Vento (w/permission)  
Maria Vento  
13 Attorney for Defendants  
SPARK CAPITAL PARTNERS, LLC and  
14 SPARK CAPITAL, L.P.

15 Dated: September 10, 2008

**IRELL & MANELLA LLP**

16  
17 By /s/ Brian Ledahl (w/permission)  
Brian Ledahl  
18 Attorney for Plaintiffs  
UMG RECORDINGS, INC.,  
19 UNIVERSAL MUSIC CORP., SONGS OF  
UNIVERSAL, INC.; UNIVERSAL-  
20 POLYGRAM INTERNATIONAL  
PUBLISHING, INC.; RONDOR MUSIC  
21 INTERNATIONAL, INC.; UNIVERSAL  
MUSIC – MGB NA LLC; UNIVERSAL  
22 MUSIC – Z TUNES LLC; and  
UNIVERSAL – MBG MUSIC  
23 PUBLISHING LTD.