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2 3 4	IRELL & MANELLA LLP Steven A. Marenberg (101033) (smarenberg Elliot Brown (150802) (ebrown@irell.com Brian D. Ledahl (186579) (bledahl@irell. Benjamin Glatstein (242034) (bglatstein@1800 Avenue of the Stars, Suite 900 Los Angeles, California 90067-4276 Telephone: (310) 277-1010 Facsimile: (310) 203-7199	erg@irell.com) n) com) Direll.com)	
6	Attorneys for Plaintiffs		
7			
8	UNITED STATES DISTRICT COURT		
9	CENTRAL DISTRICT OF CALIFORNIA		
10	WESTERN	DIVISION	
11	UMG RECORDINGS, INC., et al.,	Case No. CV-07-05744 AHM (AJWx)	
12	Plaintiffs,	DECLARATION OF HARVEY GELLER IN SUPPORT OF UMG'S	
13 14	vs. { VEOH NETWORKS, INC., et al.,	EX PARTE APPLICATION FOR PROTECTIVE ORDER RE: DEPOSITIONS	
15	Defendants.)	
16	Defendants.	Concurrently filed herewith: (1) UMG's Ex Parte Application for Protective Order re:	
17	}	Depositions (2) Declaration of Brian Ledahl	
18 19	}	Magistrate: Hon. Andrew J. Wistrich	
20	}	Date: TBD	
21		Time: TBD Ctrm: 690	
22		Discovery Cutoff: January 12, 2009	
23		Pretrial Conference: April 6, 2009 Trial Date: April 21, 2009	
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I, Harvey Geller, declare as follows:

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I have been an active member of the California State Bar since 1986. 1. Since 1995, I have been employed by the Universal Music Group ("UMG") and its predecessor as a lawyer. Prior to joining UMG, I was a litigation partner with the law firm of Mitchell, Silberberg & Knupp. I make this declaration in support of UMG's Ex Parte Application for a Protective Order re: Depositions. I have personal knowledge of the facts stated herein and could and would testify thereto if called as a witness.

- 2. The Universal Music Group consists of the music related companies (i.e. record, publishing, distribution, and merchandise) ultimately owned by Vivendi S.A. ("Vivendi") and includes all of the plaintiffs herein. I am currently the Deputy General Counsel and Senior Vice President, Business & Legal Affairs for UMG. I have held that position or a similar position at all times relevant to this declaration.
- 3. As part of my job duties and responsibilities, I am the head of UMG's litigation department, which currently consists of four attorneys (besides me) and two paralegals - all of whom ultimately report to me. The lawyers in the litigation department supervise and manage UMG's litigation, including this lawsuit. Those same lawyers also provide legal advice and counseling to the various companies comprising UMG.

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4. Among other things, I have had senior responsibility for all of UMG's significant copyright litigations in the United States, including planning its strategy and implementing that strategy with outside counsel. That litigation not only includes this case but has also included UMG's litigations against MySpace, Grouper, Napster, Aimster, Grokser, MP3.com, Bertelsmann, Hummer-Winblad, and LimeWire, to name a few.

Executed on October 14, 2008, at Santa Monica, California.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

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