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10 UNITED STATES DISTRICT COURT  
 11 CENTRAL DISTRICT OF CALIFORNIA  
 12 WESTERN DIVISION

<p>13 UMG RECORDINGS, INC., <i>et al.</i>,</p> <p>14 Plaintiffs,</p> <p>15</p> <p>16 v.</p> <p>17</p> <p>18 VEOH NETWORKS, INC., <i>et al.</i>,</p> <p>19 Defendant.</p>	<p>) Case No. CV-07-05744 AHM (AJWx)</p> <p>) <b>DECLARATION OF BENJAMIN</b></p> <p>) <b>GLATSTEIN IN SUPPORT OF UMG'S</b></p> <p>) <b>REPLY IN SUPPORT OF UMG'S EX</b></p> <p>) <b>PARTE APPLICATION FOR</b></p> <p>) <b>PROTECTIVE ORDER RE:</b></p> <p>) <b>DEPOSITIONS</b></p> <p>) <b>Filed concurrently herewith:</b></p> <p>) <b>1. Reply in Support of UMG's Ex</b></p> <p>) <b>Parte Application</b></p> <p>) Magistrate: Hon. A. Howard Matz</p> <p>) Date: October 20, 2008</p> <p>) Time: 10:00 a.m.</p> <p>) Courtroom: 14</p>
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DECLARATION OF BENJAMIN GLATSTEIN

I, Benjamin Glatstein, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for plaintiff UMG Recordings, Inc. and other affiliated UMG entities (“UMG”) in this case. I am a member in good standing of the State Bar of California and have been admitted to practice before this Court. This declaration is submitted in support of UMG’s Reply Memorandum in Support of UMG’s *Ex Parte* Application for Protective Order re: Depositions. I have personal knowledge of the facts set forth below and if called as a witness, I could and would testify to these same facts under oath.

2. As of the date of this Declaration, a search for the word “Geller” in UMG’s production returns 1,413 documents. However, that total includes all documents containing the word “Geller,” such as copyright information ownership information for the song “Three Women,” composed by “Laurie Geller.” (Bates No. UMG47342). The above total also includes documents containing financial and royalty information for the song “She’s His Sweetheart,” by “Nolan & Geller.” (Bates No. UMG468046). Similarly, that total includes a law review article in which the authors extend their thanks to an individual named “Paul Geller.” (Bates No. UMG642546).

3. UMG has produced seven unique emails from Mr. Geller. An electronic search shows that none of these emails contains the word “Veoh.”

4. Of the remaining documents in UMG’s production which are addressed to Mr. Geller, the majority are emails in which Mr. Geller is one of numerous recipients. An example of such an email, which attached articles from the New York Post and other papers, is attached hereto as Exhibit A (Bates No. UMG495168).

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5. UMG's privilege log lists Mr. Geller's name approximately 4,551 times.

Executed on October 20, 2008, at Los Angeles, California.

I declare under penalty of perjury that the foregoing is true and correct.

  
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Benjamin Glatstein