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16 UNITED STATES DISTRICT COURT  
 17 CENTRAL DISTRICT OF CALIFORNIA  
 18 WESTERN DIVISION

19 UMG RECORDINGS, INC., *et al.*,  
 20 Plaintiffs,  
 21 vs.  
 22 VEOH NETWORKS, INC., *et al.*,  
 23 Defendants.

Case No. CV-07-05744 AHM (AJWx)

**JOINT STIPULATION  
 REGARDING EXTENDING TIME  
 FOR COMPLIANCE WITH  
 DISCOVERY ORDERS**

**Concurrently filed herewith:  
 (1) [Proposed] Order**

Magistrate: Hon. Andrew J. Wistrich  
 Ctrm: 690

Discovery Cutoff: April 13, 2009  
 Pretrial Conference: July 13, 2009  
 Trial Date: July 28, 2009

1 Plaintiffs UMG Recordings, Inc., Universal Music Corp., Songs of Universal,  
2 Inc., Universal-PolyGram International Publishing, Inc., Rondor Music  
3 International, Inc., Universal Music – MGB NA LLC, Universal Music – Z Tunes  
4 LLC, and Universal Music – MBG Music Publishing, Ltd. (“UMG”) and Defendant  
5 Veoh Networks, Inc. (“Veoh”) (collectively, the “Parties”), by and through their  
6 respective counsel, stipulate and agree as follows:

7 WHEREAS, on December 23, 2008, the Court issued an Order regarding  
8 UMG's Motion to Compel Regarding (1) Search Terms, (2) Custodians, and (3)  
9 "Skype" Accounts (the "December 23 Order") (Dkt. No. 289);

10 WHEREAS, the December 23 Order required Veoh to search "Skype"  
11 accounts and produce documents therefrom by January 20, 2009;

12 WHEREAS, on December 29, 2008, the Court issued an Order regarding  
13 Veoh's Motion to Compel the Addition of Custodians and Production of Documents  
14 (the "December 29 Order") (Dkt. No. 290);

15 WHEREAS, the December 29 Order required UMG to search the files of Jim  
16 Urie and Jimmy Iovine and produce documents therefrom by January 20, 2009;

17 WHEREAS, Veoh encountered a technical issue relating to its production of  
18 documents from its "Skype" accounts, making compliance with the December 23  
19 Order by January 20, 2009, infeasible;

20 WHEREAS, UMG encountered a technical issue relating to its production of  
21 documents from the files of Messrs. Urie and Iovine, making compliance with the  
22 December 29 Order by January 20, 2009, infeasible; and

23 WHEREAS, both parties will produce documents pursuant to the Court's  
24 Orders by January 20, 2009, but require the additional time to complete production  
25 pursuant to those Orders as set forth above;

26 NOW THEREFORE, the Parties, by and through their respective counsel  
27 hereby STIPULATE AND AGREE as follows:  
28

1           A.     Veoh may have until January 26, 2009, to produce documents from its  
2 "Skype" accounts pursuant to the Court's December 23 Order; and

3           B.     UMG may have until January 29, 2009, to produce documents from  
4 Messrs. Urie's and Iovine's files pursuant to the Court's December 29 Order; and

5           C.     Nothing herein shall be construed to waive either party's right to  
6 dispute the alleged relevance or irrelevance of particular documents.

7 Dated: January 16, 2009

IRELL & MANELLA LLP  
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Elliot Brown  
Brian Ledahl  
Benjamin Glatstein

12 By:    /s Brian Ledahl  
13       Brian Ledahl

14 Attorneys for Plaintiffs

16 Dated: January 16, 2009

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22 By:    /s Jennifer A. Golinveaux  
23       (w/ permission)  
24       Jennifer A. Golinveaux

25 Attorneys for Defendants