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16 Attorneys for Defendant
17 VEOH NETWORKS, INC.

18 **UNITED STATES DISTRICT COURT**
19 **CENTRAL DISTRICT OF CALIFORNIA**

20 UMG RECORDINGS, INC., a Delaware)
21 corporation; UNIVERSAL MUSIC)
CORP., a New York corporation;)
22 SONGS OF UNIVERSAL, INC., a)
California corporation; UNIVERSAL-)
23 POLYGRAM INTERNATIONAL)
PUBLISHING, INC., a Delaware)
24 corporation; RONDOR MUSIC)
INTERNATIONAL, INC., a California)
25 corporation; UNIVERSAL MUSIC –)
MGB NA LLC, a California Limited)
26 Liability company; UNIVERSAL)
MUSIC – Z TUNES LLC, a New)
27 Limited Liability Corporation; and)

Case No. CV 07 5744 – AHM (AJWx)

The Honorable A. Howard Matz

**NOTICE OF LODGING SUMMARY
JUDGMENT BRIEFING FILED IN
IO v. VEOH REGARDING VEOH'S
SAFE HARBOR UNDER SECTION
512(c) OF THE DMCA**

28 LA:208505.1

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**NOTICE OF LODGING SUMMARY JUDGMENT BRIEFING FILED IN IO v. VEOH REGARDING VEOH'S
SAFE HARBOR PROTECTION UNDER SECTION 512(c) OF THE DMCA**

Case No. CV 07 5744 – AHM (AJWx)

1 UNIVERSAL – MBG MUSIC
2 PUBLISHING LTD., a UK company and
DOES 1-10 inclusive

3 Plaintiffs,

4 vs.

5 VEOH NETWORKS, INC. a California
6 Corporation
Defendant.

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9 During the Scheduling Conference held before the Honorable Judge Matz on
10 March 17, 2008, Judge Matz requested that Defendant Veoh Networks, Inc. ("Veoh")
11 lodge summary judgment briefs filed by both parties in *Io Group, Inc. v. Veoh*
12 *Networks, Inc.*, currently pending before United Magistrate Judge Howard R. Lloyd in
13 the United States District Court for the Northern District of California (Case No. C
14 06-3926 HRL). The briefing relates to whether Veoh qualifies for safe harbor
15 protection under Section 512(c) of the DMCA, which is also a central to the present
16 action. Accordingly, Veoh hereby lodges the following:
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18

19 1. Attached hereto as Exhibit A is a true and correct copy of Defendant
20 Veoh Network Inc.'s Notice of Motion and Motion for Summary Judgment, filed on or
21 about July 30, 2007.

22 2. Attached hereto as Exhibit B is a true and correct copy of the Declaration
23 of Ted Dunning in Support of Defendant Veoh Network's Inc.'s Motion for Summary
24 Judgment, filed on or about July 30, 2007.

25 3. Attached hereto as Exhibit C is a true and correct copy of the Declaration
26 of Joseph Papa in Support of Defendant Veoh Network's Inc.'s Motion for Summary
27 Judgment, filed on or about July 30, 2007.

28 LA:208505.1

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1 4. Attached hereto as Exhibit D is a true and correct copy of the Declaration
2 of Matthew Scherb in Support of Defendant Veoh Networks Inc.'s Motion for
3 Summary Judgment, filed on or about August 14, 2007.

4 5. Attached hereto as Exhibit E is a true and correct copy of Plaintiff IO
5 Group, Inc.'s Opposition to Defendant's Motion for Summary Judgment, filed on or
6 about August 14, 2007.

7 6. Attached hereto as Exhibit F is a true and correct copy of Defendant
8 Veoh Networks, Inc.'s Reply in Support of Its Motion for Summary Judgment, filed
9 on or about August 21, 2007.

10 7. Attached hereto as Exhibit G is a true and correct copy of Defendant
11 Veoh Networks, Inc.'s Request for Judicial Notice in Support of Reply In Support of
12 Its Motion for Summary Judgment, filed on or about August 21, 2007.

13 8. Attached hereto as Exhibit H is a true and correct copy of the Order
14 Denying Motion for Leave to Appear as Amici Curiae, issued on or about August 22,
15 2007.

16 9. Attached hereto as Exhibit I is a true and correct copy of the
17 Administrative Motion for Leave to File Supplemental Brief Explaining Relevance of
18 Recently Issued Authority and [Proposed] Order, filed on or about October 22, 2007.

19 10. Attached hereto as Exhibit J is a true and correct copy of the Declaration
20 of Gill Sperlein in Support of Plaintiff's Motion for Administrative Relief to File
21 Supplemental Brief, filed on or about October 22, 2007.

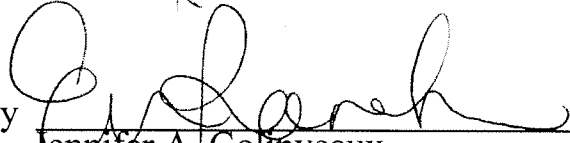
22 11. Attached hereto as Exhibit K is a true and correct copy of Defendant
23 Veoh Networks, Inc.'s Opposition to Plaintiff's Administrative Motion for Leave to
24 File Supplemental Brief, filed on or about October 25, 2007.

25 12. Attached hereto as Exhibit L is a true and correct copy of IO Group,
26 Inc.'s Supplemental Brief Explaining Relevance of Recently Issued Authority, filed on
27 or about October 16, 2007.

1 13. Attached hereto as Exhibit M is a true and correct copy of Defendant
2 Veoh Network's Inc.'s Response to Plaintiff IO Group, Inc.'s Supplemental Brief, filed
3 on or about November 16, 2007.

7 Dated: March 19, 2008

WINSTON & STRAWN LLP

8
9 By 

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