

Issue 2 - Discovery Relating to UMG's Damages, Promotion, Protection, and Value of the Allegedly Infringed Works

As to interrogatory 4, the motion is **granted** in part, but the time period is narrowed to the past 5 years. The information must be provided work-by-work when UMG maintains it on that basis, and on an aggregate basis when UMG does not.

As to interrogatory 12, the motion is **granted**. If UMG contends that it suffered no actual damages, it must say so explicitly. Otherwise, UMG must provide the requested information.

As to interrogatory 14, the motion is **granted** in part and **denied** in part. This interrogatory is narrowed to the allegedly infringed works, and UMG is obligated merely to produce the licenses (to the extent it has not already done so). To the extent that defendant wishes to compile information from those licenses, it may do so for itself.

Issue 3 - Discovery Relating to Notice to Veoh

As to interrogatory 20, the motion is **granted**. UMG must serve a supplemental response describing any oral notices. As to written notices, it is sufficient if UMG produces them.

As to interrogatory 21, the motion is **granted**.

Issue 4 - Interrogatory Regarding "Standard Technical Measures"

As to interrogatory 17, the motion is **granted**. If UMG contends that it did not employ any "standard technical measures" as that term is defined in 17 U.S.C. § 512(i)(2), it must say so explicitly.

Issue 5 - Previous Ownership Disputes Regarding Copyrights at Issue

As to interrogatory 23, the motion is **granted** in part and **denied** in part. If such a dispute rose to the level of litigation, then UMG must provide the court, the names of the parties, the docket number, and the date on which the complaint was filed. If such a dispute did not rise to the level of litigation, but did rise to a sufficiently serious level that inside counsel or outside counsel for UMG became involved, then UMG must describe the dispute in a supplemental response and produce the documents relating to the dispute.

Nothing in this order is intended to restrict UMG's ability to invoke Fed. R. Civ. P. 33(d).

Compliance within 21 days is required.

IT IS SO ORDERED.

cc: Parties

MINUTES FORM 11
CIVIL-GEN

Initials of Deputy Clerk_____