

1 Rebecca Lawlor Calkins (SBN: 195593)
Email: rcalkins@winston.com
2 Erin R. Ranahan (SBN: 235286)
Email: eranahan@winston.com
3 **WINSTON & STRAWN LLP**
333 South Grand Avenue, 38th Floor
4 Los Angeles, CA 90071-1543
Telephone: (213) 615-1700
5 Facsimile: (213) 615-1750

6 Jennifer A. Golinveaux (SBN 203056)
Email: jgolinveaux@winston.com
7 **WINSTON & STRAWN LLP**
101 California Street
8 San Francisco, CA 94111
Tel: (415) 591-1506/Fax: (415) 591-1400

9 Michael S. Elkin (*pro hac vice*)
10 Email: melkin@winston.com
Thomas P. Lane (*pro hac vice*)
11 Email: tlane@winston.com
WINSTON & STRAWN LLP
12 200 Park Avenue
New York, New York 10166
13 Tel: (212) 294-6700/Fax: (212) 294-4700

14 Attorneys for Defendant VEOH NETWORKS, INC.

15 **UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA**

17 UMG RECORDINGS, INC., a Delaware Corporation, et al.,
18 Plaintiffs,
19 vs.
20 VEOH NETWORKS, INC., a California Corporation, et al.,
21 Defendants.
22
23
24

Case No. CV 07 5744 -- AHM (AJWx)
VEOH'S CERTIFICATION RE COMPLETE PRODUCTION PER APRIL 6, 2009 ORDER [DOCKET 401]

Winston & Strawn LLP
333 S. Grand Avenue
Los Angeles, CA 90071-1543

1 Pursuant to this Court's April 6, 2009 Order (Docket 401), Veoh submits the
2 following certification to the Court:

3 Following the April 6, 2009 Order, Veoh undertook significant investigations
4 and efforts to review its production to ensure its completeness. Veoh considered each
5 of its twenty-two custodians and seventy-seven search terms to ensure that responsive
6 documents were located and produced in response to Plaintiffs' documents requests,
7 and has located additional documents it is producing to Plaintiffs.¹ Upon UMG's
8 receipt of Veoh's supplemental production, under a fair reading of the requests for
9 production as to which it has agreed to produce documents or been ordered to produce
10 documents, and to the best of Veoh's knowledge and reasonable capability, Veoh
11 hereby certifies that its production is complete. Veoh is aware of its continuing
12 discovery obligations and to the extent Veoh discovers additional responsive
13 documents, it will promptly produce any such documents.

14
15 I declare under the penalty of perjury of the laws of the United States of
16 America that the foregoing is true and correct.

17
18 Dated: April 28, 2009

WINSTON & STRAWN LLP

19
20 By: 

21 Michael S. Elkin
22 Lead Trial Counsel for
23 Defendant,
24 VEOH NETWORKS, INC.

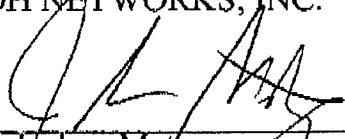
25 I declare under the penalty of perjury of the laws of the United States of
26 America that the foregoing is true and correct.

27
28 ¹ While Veoh does not consider all additional documents it is producing to be
responsive to UMG's requests, out of an abundance of caution, Veoh is producing
such documents.

1 Dated: April 28, 2009

2 VEOH NETWORKS, INC.

3
4 By:



5 Joshua Metzger
6 *Senior Vice President of*
7 *Corporate Development and*
8 *General Counsel for Defendant,*
9 VEOH NETWORKS, INC.

10
11
12 Winston & Strawn LLP
13 333 S. Grand Avenue
14 Los Angeles, CA 90071-1543
15
16
17
18
19
20
21
22
23
24
25
26
27
28