

1 Robert G. Badal (Bar No. 81313)
 2 Robert.Badal@WilmerHale.com
 3 Amanda Walker (Bar No. 252380)
 4 Amanda.Walker@WilmerHale.com
 5 WILMER CUTLER PICKERING HALE AND DORR LLP
 6 350 South Grand Avenue, Suite 2100
 7 Los Angeles, CA 90071
 8 Telephone: +1 (213) 443-5300
 9 Facsimile: +1 (213) 443-5400

10 Attorneys for Defendants
 11 SHELTER CAPITAL PARTNERS, LLC and
 12 SHELTER VENTURE FUND, L.P.

13 Steven A. Marenberg (101033) (smarenberg@irell.com)
 14 Elliot Brown (150802) (ebrown@irell.com)
 15 Brian Ledahl (186579) (bledahl@irell.com)
 16 Benjamin Glatstein (242034) (bglatstein@irell.com)
 17 IRELL & MANELLA LLP
 18 1800 Avenue of the Stars, Suite 900
 19 Los Angeles, California 90067-4276
 20 Telephone: (310) 277-1010
 21 Facsimile: (310) 203-7199

22 Attorneys for Plaintiffs
 23 [OTHER COUNSEL LISTED ON SIGNATURE PAGES]

24 UNITED STATES DISTRICT COURT
 25 CENTRAL DISTRICT OF CALIFORNIA
 26 WESTERN DIVISION

27 UMG RECORDINGS INC. et al.,

28 Plaintiffs,

v.

VEOH NETWORKS, INC. et al.,

Defendants.

Case No. CV07-5744 AHM (AJWx)

**JOINT STIPULATION
 REGARDING ENTRY OF FINAL
 JUDGMENT PURSUANT TO
 RULE 54(b)**

The Honorable A. Howard Matz
 Courtroom: 14

1 UMG Recordings, Inc., Universal Music Corp., Songs of Universal, Inc.,
2 Universal-PolyGram International Publishing, Inc., Rondor Music International, Inc.,
3 Universal Music – MGB NA LLC, Universal Music – Z Tunes LLC, and Universal
4 Music – MBG Music Publishing, Ltd. (“Plaintiffs”) and Shelter Capital Partners,
5 LLC, Shelter Venture Fund, LP, Spark Capital, LLC, and Spark Capital, LP, and The
6 Tornante Company, LLC (“Investor Defendants”) (collectively, the “Parties”), by
7 and through their respective counsel, stipulate and agree as follows:

8 WHEREAS, pursuant to Federal Rule of Civil Procedure 54(b), when an
9 action presents more than one claim for relief or when multiple parties are involved,
10 the court may direct entry of a final judgment as to one or more, but fewer than all,
11 claims or parties if the court determines that there is no just reason for delay;

12 WHEREAS, Plaintiffs filed a complaint against Veoh Networks, Inc. on
13 September 4, 2007;

14 WHEREAS, the Court granted Plaintiffs Motion for Leave to Amend
15 Complaint to add Defendants on August 22, 2008 and Plaintiffs thereafter added the
16 Investor Defendants as parties on August 26, 2008;

17 WHEREAS, on October 16, 2008, the Investor Defendants filed a motion to
18 dismiss Plaintiffs’ First Amended Complaint and this Court granted that motion
19 without prejudice on February 2, 2009;

20 WHEREAS, Plaintiffs filed a Second Amended Complaint on February 23,
21 2009, the Investor Defendants filed a motion to dismiss on March 2, 2009, and on
22 May 5, 2009, the Court granted with prejudice the Investor Defendants’ Motion to
23 Dismiss Plaintiffs’ Second Amended Complaint;

24 WHEREAS, the Court’s May 5, 2009 Order granting with prejudice the
25 Investor Defendants’ motion to dismiss disposed of all claims asserted against the
26 Investor Defendants on all causes of action;

27 WHEREAS, the efficient administration of justice will be served by entry of
28 final judgment because it will terminate proceedings in the District Court as to the

1 Investor Defendants and will ripen any appeal that might be taken from the Court's
2 Order, thereby expediting the appeals process; and

3 WHEREAS, Plaintiffs and the Investor Defendants agree that there is no just
4 reason for delaying entry of final judgment.

5 NOW THEREFORE, the Parties, by and through their respective counsel
6 hereby STIPULATE AND AGREE as follows:

7 A. Entry of final judgment may be entered pursuant to Rule 54(b) as to all
8 claims between Shelter Capital Partners, LLC, Shelter Venture Fund, LP, Spark
9 Capital, LLC, and Spark Capital, LP, and The Tornante Company, LLC and
10 Plaintiffs as alleged in the Second Amended Complaint.

11 B. An appropriate Proposed Order has been agreed upon by the Parties and
12 is filed concurrently herewith.

13
14 Dated: May 29, 2009

15 WILMER CUTLER HALE PICKERING &
16 DORR LLP


17 ORRICK HERRINGTON & SUTCLIFFE LLP

18 By 
19 _____
20 ROBERT G. BADAL

21 Attorneys for Defendants
22 SHELTER CAPITAL PARTNERS, LLC and
23 SHELTER VENTURE FUND, L.P.

24 Dated: May 29, 2009

25 KULIK, GOTTESMAN, MOUTON & SIEGEL,
26 LLP

27 By 
28 _____
GLEN L. KULIK
ALISA S. EDELSON

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Attorneys for Defendant
THE TORNANTE COMPANY LLC

Dated: May 29, 2009

WILMER CUTLER HALE PICKERING AND
DORR LLP

By Maria Vento by PJB
MARIA VENTO

Attorneys for Defendants
SPARK CAPITAL PARTNERS, LLC AND
SPARK CAPITAL, L.P.

Dated: May 29, 2009

IRELL & MANELLA LLP

By Brian Ledahl by PJB
BRIAN LEDAHL

Attorneys for Plaintiffs UMG RECORDINGS,
INC., UNIVERSAL MUSIC CORP., SONGS OF
UNIVERSAL, INC., UNIVERSAL-
POLYGRAM INTERNATIONAL
PUBLISHING, INC., RONDOR MUSIC
INTERNATIONAL, INC., UNIVERSAL MUSIC
- MGB NA LLC, UNIVERSAL MUSIC - Z
TUNES LLC, and UNIVERSAL - MBG MUSIC
PUBLISHING, LTD.

() Consent to sign provided by counsel*