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

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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.

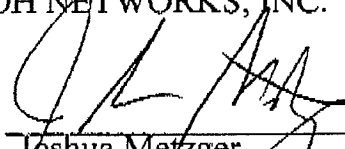
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28 ¹ While Veoh does not consider all additional documents it is producing to be responsive to UMG's requests, out of an abundance of caution, Veoh is producing such documents.

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Dated: April 28, 2009

VEOH NETWORKS, INC.

By:



Joshua Metzger
*Senior Vice President of
Corporate Development and
General Counsel for Defendant,*
VEOH NETWORKS, INC.

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