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11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA
13 WESTERN DIVISION

14 UMG RECORDINGS, INC., *et al.*,

15 Plaintiffs,

16 v.

17 VEOH NETWORKS, INC.,

18 Defendant.

Case No. CV-07-05744 AHM (AJWx)

**DECLARATION OF BRIAN LEDAHL
IN SUPPORT OF UMG'S REPLY IN
SUPPORT OF MOTION FOR LEAVE
TO AMEND COMPLAINT TO ADD
DEFENDANTS**

Magistrate: Hon. A. Howard Matz

Date: July 21, 2008
Time: 10:00 a.m.
Courtroom: 14

Discovery Cutoff: January 12, 2009
Pretrial Conference: April 6, 2009
Trial Date: April 21, 2009

1 7. Veoh has not yet produced a single internal email communication.

2 8. It is apparent that Veoh has not produced many of the documents that it
3 had produced in its prior Northern District of California litigation against Io Group.
4 For example, UMG believes that Veoh produced various internal email
5 communications, as well as various internal documents from a so-called "wiki" that
6 describe many aspects of its business and computer systems. These documents have
7 not been produced in this case.

8 9. Veoh refuses to identify which of its employees' files it will search for
9 responsive documents, and refuses to identify which search terms it will use to
10 identify responsive documents. Further, Veoh refuses to clarify what documents it
11 does intend to produce, or when they will be produced.

12 Executed on July 14, 2008, at Los Angeles, California.

13 I declare under penalty of perjury that the foregoing is true and correct.

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Brian Ledahl