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5 Attorneys for Plaintiffs  
 CAN'T STOP PRODUCTIONS, INC.  
 6 and SCORPIO MUSIC (BLACK SCORPIO) S.A.

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UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF CALIFORNIA

SCORPIO MUSIC (BLACK SCORPIO) S.A.  
 and CAN'T STOP PRODUCTIONS, INC.,

Case No. 11CV1557 BTM RBB  
 Honorable Barry T. Moskowitz

Plaintiffs,

DECLARATION OF ROBERT S.  
 BESSER IN OPPOSITION TO  
 MOTION TO DISMISS COMPLAINT

vs.

VICTOR WILLIS, an individual,

Defendant.

Date: November 18, 2011  
 Time: 11:00 a.m.  
 Ctrm: 15

**ORAL ARGUMENT REQUESTED**

1 I, Robert S. Besser declare as follows:

2 1. I am the attorney of record for Plaintiffs herein and make this Declaration  
3 from personal knowledge. If called as a witness, I could, and would, competently testify  
4 to the facts set forth herein.

5 2. Attached hereto as Exhibit "A" is a true and exact copy of the listing from  
6 the Records from the United States Copyright Office identifying the authors of each of  
7 the 33 compositions involved in this action. In the few instances where the top  
8 summary sheet does not identify the authors, I have attached the more complete  
9 description from the copyright records that does identify each of the authors of the  
10 particular song.

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

12 Executed this 4<sup>th</sup> day of November, 2011, at Santa Monica, California.

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16 ROBERT S. BESSER  
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# **EXHIBIT “A”**

**Copyright**

United States Copyright Office

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Titles

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## Public Catalog

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Search Request: Left Anchored Name = Willis Victor

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Resort results by:

Set Search Limits

#	Name (NALL) <	Full Title	Copyright Number	Date
<input type="checkbox"/> [ 2 ]	Willis, Victor	Another lonely man. By Patrick Juvet, Jacques Morali & Victor Willis.	PA0000038594	1979
<input type="checkbox"/> [ 4 ]	Willis, Victor	Around the world / J. Morali, H. Belolo, V. Willis [i.e. music Jacques Morali ; lyrics Henri Belolo & Victor Willis]	PA0000012951	1978
<input type="checkbox"/> [ 5 ]	Willis, Victor	Bad reputation / J. Morali, H. Belolo, V. Willis.	PA0000040224	1979
<input type="checkbox"/> [ 6 ]	Willis, Victor	Broadway / J. Morali, H. Belolo, V. Willis [i.e. music Jacques Morali ; lyrics Henri Belolo & Victor Willis]	PA0000012949	1978
<input type="checkbox"/> [ 7 ]	Willis, Victor	Citizens of the world / [performed by] Village People.	PA0000029526	1979
<input type="checkbox"/> [ 8 ]	Willis, Victor	Cruisin' / songs written by Jacques Morali, Henri Belolo & Victor Willis ; [performed by] Village People.	SR0000003730	1978
<input type="checkbox"/> [ 9 ]	Willis, Victor	Don't cry, Mommy / J. Morali, H. Belolo, V. Willis [i.e. music Jacques Morali ; lyrics Henri Belolo & Victor Willis]	PA0000012953	1978
<input type="checkbox"/> [ 10 ]				
<input type="checkbox"/> [ 11 ]				
<input type="checkbox"/> [ 12 ]	Willis, Victor	French pillow talk / P. Juvet, J. Morali, V. Willis.	PA0000048438	1979
<input type="checkbox"/> [ 13 ]	Willis, Victor	Gay Paris / P. Juvet, J. Morali, V. Willis.	PA0000048437	1979
<input type="checkbox"/> [ 14 ]	Willis, Victor	Get away holiday / [performed by] Village People.	PA0000029528	1979

<input type="checkbox"/>	Willis, Victor	Go West / words and music by J. Morali, H. Belolo, and V. Willis.	PA0000038571	1979
[ 16 ]				
<input type="checkbox"/>	Willis, Victor	Got a feeling. By Patrick Juvet, Jacques Morali & Victor Willis.	PA0000038592	1979
[ 17 ]				
<input type="checkbox"/>	Willis, Victor	Hot cop / [performed by] Village People.	PA0000019713	1978
[ 19 ]				
<input type="checkbox"/>	Willis, Victor	I love America / P. Juvet, J. Morali, V. Willis.	PA0000029910	1978
[ 22 ]				
<input type="checkbox"/>	Willis, Victor	I wanna shake your hand / [performed by] Village People.	PA0000029527	1979
[ 23 ]				
<input type="checkbox"/>	Willis, Victor	I'ma cruiser / [performed by] Village People.	PA0000019712	1978
[ 24 ]				

Resort results by:

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<input type="radio"/> All on Page <input checked="" type="radio"/> Selected On Page <input type="radio"/> Selected all Pages	Enter your email address: <input type="text"/> <input type="button" value="Email"/>

Search for: Willis Victor  
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Search by: Name (Crichton Michael; Walt Disney Company)

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2

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[◀ previous](#)
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#	Name (NALL) <	Full Title	Copyright Number	Date
<input type="checkbox"/> [ 26 ]	Willis, Victor	In the Navy / words and music by J. Morali, H. Belolo, and V. Willis.	PA0000037990	1979
<input type="checkbox"/> [ 27 ]	Willis, Victor	It's a man's world.	PA0000040225	1979
<input type="checkbox"/> [ 28 ]	Willis, Victor	Josephine superstar / J. Morali, H. Belolo, V. Willis [i.e. music Jacques Morali : lyrics Henri Belolo & Victor Willis]	PA0000012952	1978
<input type="checkbox"/> [ 29 ]				
<input type="checkbox"/> [ 30 ]	Willis, Victor	Lady Night / P. Juvet, J. Morali, V. Willis.	PA0000048434	1979
<input type="checkbox"/> [ 31 ]				
<input type="checkbox"/> [ 32 ]	Willis, Victor	M.B.T.A./ written by Bob Buckley [i.e. Robert E. Buckley] and Doreen Vaillette.	TXu000019422	1979
<input type="checkbox"/> [ 33 ]				
<input type="checkbox"/> [ 34 ]				
<input type="checkbox"/> [ 35 ]	Willis, Victor	Magic night / J. Morali, H. Belolo, V. Willis.	PA0000086058	1980
<input type="checkbox"/> [ 36 ]	Willis, Victor	Manhattan woman / J. Morali, H. Belolo, V. Willis : [performed by Village People]	PA0000027112	1979
<input type="checkbox"/> [ 37 ]	Willis, Victor	Milkshake / J. Morali, H. Belolo, V. Willis.	PA0000086060	1980
<input type="checkbox"/> [ 38 ]	Willis, Victor	My roommate [sic] / [performed by] Village People.	PA0000019714	1978

<input type="checkbox"/>	Willis, [41] Victor	Saint Louis / J. Morali, H. Belolo, V. Willis [i.e. music Jacques Morali ; lyrics Henri Belolo & Victor Willis]	PA0000012948	1978
<input type="checkbox"/>	Willis, [42] Victor	Sexy man.	PA0000040227	1979
<input type="checkbox"/>				
<input type="checkbox"/>	Willis, [45] Victor	Star of Paris / J. Morali, H. Belolo, V. Willis [i.e. music Jacques Morali ; lyrics Henri Belolo & Victor Willis]	PA0000012950	1978
<input type="checkbox"/>				
<input type="checkbox"/>	Willis, [47] Victor	Swiss kiss / P. Juvet, J. Morali, V. Willis.	PA0000048435	1979
<input type="checkbox"/>	Willis, [48] Victor	Ups and downs / [performed by] Village People.	PA0000019715	1978
<input type="checkbox"/>	Willis, [50] Victor	Viva California / P. Juvet, J. Morali, V. Willis.	PA0000048436	1979

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Search by: Name (Crichton Michael; Walt Disney Company)

Item type

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**Copyright**

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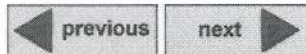
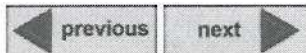
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## Public Catalog

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[Labeled View](#)*Get away holiday / [performed by] Village People.***Type of Work:** Music**Registration Number / Date:** PA0000029528 / 1979-04-09**Title:** Get away holiday / [performed by] Village People.**Appears in:** Go West. Casablanca Record and FilmWorks NBLP 7144 DJ, c1979. 1 sound disc : 33 1/3 rpm, stereo. ; 12 in. + 1 poster. side 2, band 2**Publisher Number:** Casablanca Record and FilmWorks NBLP 7144 DJ**Notes:** Written by J. Morali, H. Belolo & V. Willis.**Copyright Claimant:** Scorpio Music (Black Scorpio)**Date of Creation:** 1979**Date of Publication:** 1979-03-23**Authorship on Application:** words & music: Jacques Morali, Henri Belolo & Victor Willis.**Names:** Morali, JacquesBelolo, HenriWillis, VictorVillage PeopleScorpio Music (Black Scorpio)**Save, Print and Email (Help Page)**Select Download Format  Full Record  

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6



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◀ previous next ▶

Labeled View

*Hot cop / [performed by] Village People.*

Type of Work: Music

Registration Number / Date: PA0000019713 / 1978-12-11

Title: Hot cop / [performed by] Village People.

Appears in: Cruisin'. Casablanca Record and FilmWorks NBLP 7118, c1978. 1 sound disc : 33 1/3 rpm. stereo. ; 12 in. side 2, band 1

Publisher Number: Casablanca Record and FilmWorks NBLP 7118

Notes: Song written by Jacques Morali, Henri Belolo & Victor Willis.

Copyright Claimant: Scorpio Music (Black Scorpio)

Date of Creation: 1978

Date of Publication: 1978-09-12

Authorship on Application: words & music: Jacques Morali, Henri Belolo & Victor Willis.

- Names: Morali, Jacques
- Belolo, Henri
- Willis, Victor
- Village People
- Scorpio Music (Black Scorpio)

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7

**Copyright**

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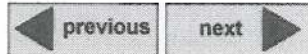
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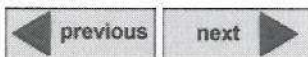
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Labeled View

*It's a man's world.***Type of Work:** Music**Registration Number / Date:** PA0000040225 / 1979-08-03**Title:** It's a man's world.**Appears in:** Bad reputation. Casablanca Record and FilmWorks NBLP 7166-DJ, c1979. 1 sound disc : 33 1/3 rpm, stereo. ; 12 in. side 2, band 1 [with Where are the men?]**Publisher Number:** Casablanca Record and FilmWorks NBLP 7166-DJ**Notes:** Written by J. Morali, H. Belolo & V. Willis.**Performer:** Performed by Ritchie Family.**Copyright Claimant:** Scorpio Music (Black Scorpio)**Date of Creation:** 1979**Date of Publication:** 1979-07-02**Authorship on Application:** music: Jacques Morali; words: Henri Belolo & Victor Willis.**Names:** Morali, JacquesBelolo, HenriWillis, VictorRitchie FamilyScorpio Music (Black Scorpio)**Save, Print and Email (Help Page)**Select Download Format Full Record  

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8

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Labeled View

*My roommate [sic] / [performed by] Village People.*

**Type of Work:** Music

**Registration Number / Date:** PA0000019714 / 1978-12-11

**Title:** My roommate [sic] / [performed by] Village People.

**Appears in:** Cruisin'. Casablanca Record and FilmWorks NBLP 7118, c1978. 1 sound disc : 33 1/3 rpm, stereo. ; 12 in. side 2, band 2

**Publisher Number:** Casablanca Record and FilmWorks NBLP 7118

**Notes:** Song written by Jacques Morali, Henri Belolo & Victor Willis.

**Copyright Claimant:** Scorpio Music (Black Scorpio)

**Date of Creation:** 1978

**Date of Publication:** 1978-09-12

**Authorship on Application:** words & music: Jacques Morali, Henri Belolo & Victor Willis.

**Other Title:** My roommate

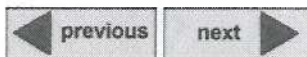
**Names:** Morali, Jacques

Belolo, Henri

Willis, Victor

Village People

Scorpio Music (Black Scorpio)



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9



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◀ previous next ▶

Labeled View

*Sexy man.*

**Type of Work:** Music

**Registration Number / Date:** PA0000040227 / 1979-08-03

**Title:** Sexy man.

**Appears in:** Bad reputation. Casablanca Record and FilmWorks NBLP 7166-DJ, c1979. 1 sound disc : 33 1/3 rpm, stereo. ; 12 in. side 2, band 2

**Publisher Number:** Casablanca Record and FilmWorks NBLP 7166-DJ

**Notes:** Written by J. Morali, H. Belolo & V. Willis.

**Performer:** Performed by Ritchie Family.

**Copyright Claimant:** Scorpio Music (Black Scorpio)

**Date of Creation:** 1979

**Date of Publication:** 1979-07-02

**Authorship on Application:** music: Jacques Morali; words: Henri Belolo & Victor Willis.

- Names:** Morali, Jacques  
Belolo, Henri  
Willis, Victor  
Ritchie Family  
Scorpio Music (Black Scorpio)

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10

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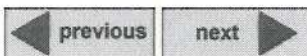
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## Public Catalog

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Labeled View

*Ups and downs / [performed by] Village People.*

**Type of Work:** Music

**Registration Number / Date:** PA0000019715 / 1978-12-11

**Title:** Ups and downs / [performed by] Village People.

**Appears in:** Cruisin'. Casablanca Record and FilmWorks NBLP 7118, c1978. 1 sound disc : 33 1/3 rpm, stereo. ; 12 in. side 2, band 3

**Publisher Number:** Casablanca Record and FilmWorks NBLP 7118

**Notes:** Song written by Jacques Morali, Henri Belolo & Victor Willis.

**Copyright Claimant:** Scorpio Music (Black Scorpio)

**Date of Creation:** 1978

**Date of Publication:** 1978-09-12

**Authorship on Application:** words & music: Jacques Morali, Henri Belolo & Victor Willis.

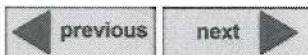
**Names:** Morali, Jacques

Belolo, Henri

Willis, Victor

Village People

Scorpio Music (Black Scorpio)



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Labeled View

*Where are the men?*

**Type of Work:** Music

**Registration Number / Date:** PA0000040226 / 1979-08-03

**Title:** Where are the men?

**Appears in:** Bad reputation. Casablanca Record and FilmWorks NBLP 7166-DJ. c1979. 1 sound disc : 33 1/3 rpm, stereo. ; 12 in. side 2, band 1 [with It's a man's world]

**Publisher Number:** Casablanca Record and FilmWorks NBLP 7166-DJ

**Notes:** Written by J. Morali, H. Belolo & V. Willis.

**Performer:** Performed by Ritchie Family.

**Copyright Claimant:** Scorpio Music (Black Scorpio)

**Date of Creation:** 1979

**Date of Publication:** 1979-07-02

**Authorship on Application:** music: Jacques Morali; words: Henri Belolo & Victor Willis.

- Names:** Morali, Jacques  
Belolo, Henri  
Willis, Victor  
Ritchie Family  
Scorpio Music (Black Scorpio)

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12

