

**UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

**EIGHT MILE STYLE, LLC, and MARTIN
AFFILIATED, LLC,**

Plaintiffs,

vs.

**APPLE COMPUTER, INC. and
AFTERMATH RECORDS d/b/a
AFTERMATH ENTERTAINMENT**

Defendant.

Case No. 2:07-cv-13164

Hon. Anna Diggs Taylor

Magistrate Judge Donald A. Scheer

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**DECLARATION OF MARC R. GUILFORD IN SUPPORT OF PLAINTIFFS'
RESPONSE IN OPPOSITION TO DEFENDANTS' MOTION IN LIMINE NO. 1: TO
EXCLUDE TESTIMONY OF LAW PROFESSOR HOWARD B. ABRAMS**

I, Marc R. Guilford, having personal knowledge of the facts contained in this declaration, state as follows:

1. I am an attorney and associate in the law firm of King & Ballow, which represents plaintiffs Eight Mile Style, LLC and Martin Affiliated, LLC ("Plaintiffs") in the above-entitled action. I am familiar with the files in this litigation.

2. Attached hereto as **Exhibit A** is a true and accurate copy of the relevant pages of the transcript of the deposition of Peter Paterno taken on April 30, 2008.

3. Attached hereto as **Exhibit B** is a true and accurate copy of the relevant pages of the transcript of the deposition of Rand Hoffman taken on May 27, 2008.

4. Attached hereto as **Exhibit C** is a true and accurate copy of the relevant pages of the transcript of the deposition of Howard B. Abrams taken on October 8, 2008.

5. Attached hereto as **Exhibit D** is a true and accurate copy of the Verdict form in the case *F.B.T. Productions, LLC v. Aftermath Records*, Case No. CV07-03314 PSG, Central District of California, Western Division.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed this 17th day of September, 2009.

/s/ Marc R. Guilford
Marc R. Guilford

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served via the Court's Electronic Filing System:

Counsel	On behalf of
<p>Daniel D. Quick, Esq. Dickinson Wright PLLC 38525 Woodward Ave Suite 2000 Bloomfield Hills, MI 48304 (t): (248) 433-7200 (e): dquick@dickinsonwright.com</p> <p>Kelly M. Klaus, Esq. Munger, Tolles & Olson LLP 355 South Grand Ave Suite 3500 Los Angeles, CA 90071-1560 (t): (213) 683-9238 (e): kelly.klaus@mto.com</p>	<p>Apple Computer, Inc. and Aftermath Records d/b/a Aftermath Entertainment</p>

this 17th day of September 2009.

s/ Richard S. Busch