

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

VIRGIN RECORDS AMERICA, INC., a
California corporation; CAPITOL
RECORDS INC., a Delaware corporation;
SONY BMG MUSIC ENTERTAINMENT,
a Delaware general partnership; ARISTA
RECORDS LLC, a Delaware limited liability
company; INTERSCOPE RECORDS, a
California general partnership; WARNER
BROS. RECORDS INC., a Delaware corporation;
and UMG RECORDINGS, INC., a Delaware corporation,

Case No. 06-cv-1497 (MJD/RLE)

ANSWER

Plaintiffs,

vs.

JAMMIE THOMAS,

Defendant.

Defendant, Jammie Thomas, answers plaintiff's Complaint stating as follows:

1. Pursuant to Rule 38 of the Federal Rules of Civil Procedure, defendant hereby demands a trial by jury of all issues triable of right by jury.
2. Unless otherwise admitted or qualified below, defendant denies each and every allegation of the Complaint.
3. Defendant admits the allegations of paragraphs of the Complaint ("Paragraphs") 1, 2, 11 and 12.
4. With respect to paragraphs 4, 5, 6, 7, 8, 9, 10, 13, 14 and 16, defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations therein and puts plaintiffs to their strict burden of proof thereof.
5. With respect to paragraph 3, defendant admits that this Court has personal

jurisdiction over defendant as alleged and that venue is proper as alleged, but defendant denies the existence of any acts of infringement.

6. The allegations of paragraphs 15, 17, 18 and 19 are denied.

AFFIRMATIVE ALLEGATIONS

7. The Complaint fails to state a claim upon which relief can be granted.

8. The Complaint fails to joint one or more individuals as parties to the action whose absence precludes complete relief to those already parties, or impairs defendant's ability to protect her interests within the meaning of Rule 19 of the Federal Rules of Civil Procedure.

WHEREFORE, defendant demands judgment against plaintiffs, and each of them, dismissing their cause of action and awarding defendant her costs, disbursements and attorneys fees, and such other and further relief as the Court deems just and equitable.

Dated: May 30, 2006

s/ Brian N. Toder
Brian N. Toder (#17869X)
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