

EXHIBIT 1

Copyright Claimant	Copyright Plaintiff	Artist	Song Title	Album Title	SR	Registration Date
The David Geffen Company	UMG Recordings, Inc.	Guns N Roses	Welcome to the Jungle	Appetite for Destruction	85-358	11/9/1987
Polygram Records, Inc.	UMG Recordings, Inc.	Vanessa Williams	Save the Best for Last	Comfort Zone	141-365	4/21/1992
A&M Records, Inc.	UMG Recordings, Inc. SONY BMG MUSIC ENTERTAINMENT	Janet Jackson	Let's Wait Awhile	Control	69-529	3/6/1986
CBS Records, Inc.		Gloria Estefan	Here We Are	Cuts Both Ways	107-742	8/17/1989
Warner Brothers Records, Inc.	Warner Bros. Records Inc. SONY BMG MUSIC ENTERTAINMENT	Goo Goo Dolls	Iris	Dizzy Up the Girl	246-538	10/2/1998
CBS, Inc.		Journey	Faithfully	Frontiers	43-223	3/16/1983
Arista Records, Inc.	Arista Records LLC	Sarah McLachlan	Possession	Fumbling Towards Ecstasy	200-152	11/14/1994
Geffen Records, Inc.	UMG Recordings, Inc.	Aerosmith	Cryin'	Get A Grip	153-061	5/4/1993
Warner Brothers Records, Inc.	Warner Bros. Records Inc.	Linkin Park	One Step Closer	Hybrid Theory	288-402	11/7/2000
Mercury Records	UMG Recordings, Inc.	Def Leppard	Pour Some Sugar on Me	Hysteria	90-420	4/6/1988
MCA Records Nashville, a division of MCA Records, Inc.	UMG Recordings, Inc. SONY BMG MUSIC ENTERTAINMENT	Reba McEntire	One Honest Heart	If You See Him	256-807	7/20/1998
Sony Music Entertainment, Inc.	SONY BMG MUSIC ENTERTAINMENT	Gloria Estefan	Coming Out of the Dark	Into The Light	208-812	11/20/1992
CBS, Inc.	SONY BMG MUSIC ENTERTAINMENT	Gloria Estefan	Rhythm is Gonna Get You	Let It Loose	83-468	6/19/1987
A&M Records, Inc.	UMG Recordings, Inc.	Bryan Adams	Somebody	Reckless	58-024	11/7/1984
Interscope Records	Interscope Records	No Doubt	Bathwater	Return Of Saturn	279-727	5/2/2000
Interscope Records	Interscope Records	No Doubt	Hella Good	Rock Steady	305-872	1/23/2002
A&M Records, Inc.	UMG Recordings, Inc.	Sheryl Crow	Run, Baby, Run	Tuesday Night Music Club	209-823	6/27/1995
The David Geffen Company	UMG Recordings, Inc.	Guns N Roses	November Rain	Use Your Illusion I	134-647	10/21/1991
Virgin Records Limited	Virgin Records America, Inc.	Janet Jackson	Back	Janet	174-392	5/24/1993
Capitol Records, Inc.	Capitol Records, Inc. SONY BMG MUSIC ENTERTAINMENT	Richard Marx	Now and Forever	Paid Vacation	210-246	7/26/1995
CBS, Inc.	SONY BMG MUSIC ENTERTAINMENT	Journey	Don't Stop Believin'	Escape	30-088	10/13/1991
Sony Music Entertainment, Inc.	SONY BMG MUSIC ENTERTAINMENT	Destiny's Child	Bills, Bills, Bills	The Writing's on the Wall	268-936	9/21/1999
Arista Records, Inc.	Arista Records LLC	Sarah McLachlan	Building a Mystery	Surfacing	243-027	10/20/1997

Copyright Claimant	Copyright Plaintiff	Artist	Song Title	Album Title	SR	Registration Date
Interscope Records Reprise Records, a division of Warner Bros. Records Inc.	Interscope Records	No Doubt	Different People	Tragic Kingdom	206-724	2/12/1996
Universal Records, Inc.	Warner Bros. Records Inc.	Green Day	Basket Case	Dookie	185-457	3/23/1994
	UMG Recordings, Inc.	Godsmack	Spiral	Awake	293-376	3/13/2001

EXHIBIT 2

PLAINTIFFS' EXHIBIT A RECORDINGS on Exhibit A attached to the Complaint in this action, does own or control exclusive rights to the copyright in each such SOUND RECORDING next to which the Plaintiff is listed.

RESPONSE:

Defendant objects to this Request because it is calculated to require defendant to conduct an overly burdensome inquiry. Defendant has made a reasonable inquiry and the information known or readily obtainable by defendant is insufficient to admit or deny the request.

REQUEST FOR ADMISSION NO. 14:

Admit that YOU have no evidence to dispute that each Plaintiff listed as owning a copyright in one or more of PLAINTIFFS' EXHIBIT A RECORDINGS on Exhibit A attached to the Complaint in this action, does own or control exclusive rights to the copyright in each such SOUND RECORDING next to which the Plaintiff is listed.

RESPONSE:

Admit

REQUEST FOR ADMISSION NO. 15:

Admit that each of PLAINTIFFS' EXHIBIT A RECORDINGS was duly registered with the United States Copyright Office prior to the first date on which YOU downloaded or MADE AVAILABLE each such SOUND RECORDING.

RESPONSE:

Defendant objects to this Request because it is calculated to require defendant to conduct an overly burdensome inquiry. Defendant has made a reasonable inquiry and

the information known or readily obtainable by defendant is insufficient to admit or deny the request.

REQUEST FOR ADMISSION NO. 16:

Admit that YOU have no evidence to dispute that each of PLAINTIFFS' EXHIBIT A RECORDINGS were duly registered with the United States Copyright Office prior to the first date on which you downloaded or MADE AVAILABLE each such SOUND RECORDING.

RESPONSE:

Admit

REQUEST FOR ADMISSION NO. 17:

Admit that all of PLAINTIFFS' EXHIBIT A RECORDINGS bore United States copyright notices over the last three years prior to the filing of the Complaint in this case.

RESPONSE:

Defendant objects to this Request because it is calculated to require defendant to conduct an overly burdensome inquiry. Defendant has made a reasonable inquiry and the information known or readily obtainable by defendant is insufficient to admit or deny the request.

REQUEST FOR ADMISSION NO. 18:

Admit that YOU had access to copies of PLAINTIFFS' EXHIBIT A RECORDINGS, which bore United States copyright notices over the last three years prior to the filing of the Complaint in this case.

RESPONSE:

Deny

REQUEST FOR ADMISSION NO. 19:

Admit that each copyright registration for each sound recording identified in PLAINTIFFS' EXHIBIT A RECORDINGS is valid.

RESPONSE:

Defendant objects to this Request because it is calculated to require defendant to conduct an overly burdensome inquiry. Defendant has made a reasonable inquiry and the information known or readily obtainable by defendant is insufficient to admit or deny the request.

REQUEST FOR ADMISSION NO. 20:

Admit that YOU have no evidence to dispute that each copyright registration for each sound recording identified in PLAINTIFFS' EXHIBIT A RECORDINGS is valid.

RESPONSE:

Admit

REQUEST FOR ADMISSION NO. 21:

Admit that none of Plaintiffs have ever authorized YOU to copy or download any of PLAINTIFFS' EXHIBIT A RECORDINGS onto a computer hard drive.

RESPONSE:

Defendant objects to this request as being vague in that copying a cd to a hard drive implicates the Fair Use Doctrine which may or may not arguably be a form of

authorization by one or more plaintiffs.

REQUEST FOR ADMISSION NO. 22:

Admit that when YOU downloaded each of PLAINTIFFS' EXHIBIT A RECORDINGS onto THE COMPUTER, YOU willfully infringed the copyright in each sound recording.

RESPONSE:

Defendant objects to this request because it erroneously assumes defendant downloaded any recordings from Plaintiffs' Exhibit A. Deny.

REQUEST FOR ADMISSION NO. 23:

Admit that on or before the date of the filing of the Complaint in this action YOU MADE AVAILABLE PLAINTIFFS' EXHIBIT A RECORDINGS via an ONLINE MEDIA DISTRIBUTION SYSTEM.

RESPONSE:

Deny

REQUEST FOR ADMISSION NO. 24:

Admit that none of Plaintiffs ever has authorized YOU to MAKE AVAILABLE PLAINTIFFS' EXHIBIT A RECORDINGS to be downloaded or copied onto the computer hard drive of any other PERSON.

RESPONSE:

Admit

REQUEST FOR ADMISSION NO. 25:

Admit that after YOU received the Complaint in this action, YOU deleted some

the information known or readily obtainable by defendant is insufficient to admit or deny the request.

REQUEST FOR ADMISSION NO. 29:

Admit that YOU have no evidence to dispute that each sound recording identified in PLAINTIFFS' EXHIBIT A RECORDINGS is identical to corresponding sound recording registered with the United States Copyright Office.

RESPONSE:

Admit

REQUEST FOR ADMISSION NO. 30:

Admit that YOU have used "tereastarr" as an any part of an email address, instant messenger address, screen name, user name, alias or nickname.

RESPONSE:

Admit

Dated: September 18, 2006

CHESTNUT & CAMBRONNE, P.A.

By 

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