

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,

Plaintiffs,

v.

Jammie Thomas,

Defendant.

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

**DEFENDANT'S PROPOSED
SPECIAL VERDICT FORM**

VERDICT FORM

We, the jury, return the following verdict:

1. Did plaintiff Virgin Records America, Inc. own the copyright to one or more of the song titles it claims defendant subjected to an act of infringement?

YES _____

NO _____

If you answered "NO," go directly to Question 4.

2. If you answered "YES" to the previous question, did defendant commit an act of infringement with respect to one or more copyrights of song titles owned by plaintiff Virgin Records America, Inc.?

YES _____

NO _____

3. If you answered “YES” to the previous question, you may award an amount of money that will fairly compensate Virgin Records America, Inc. If you answered “NO,” go directly to the next question.

\$ _____

4. Did plaintiff Capitol Records, Inc. own the copyright to one or more of the song titles it claims defendant subjected to an act of infringement?

YES _____

NO _____

If you answered “NO,” go directly to Question 7.

5. If you answered “YES” to the previous question, did defendant commit an act of infringement with respect to one or more copyrights of song titles owned by plaintiff Capitol Records, Inc.?

YES _____

NO _____

6. If you answered “YES” to the previous question, you may award an amount of money that will fairly compensate Virgin Records America, Inc. If you answered “NO,” go directly to the next question.

\$ _____

7. Did plaintiff Sony BMG Music Entertainment own the copyright to one or more of the song titles it claims defendant subjected to an act of infringement?

YES _____

NO _____

If you answered “NO,” go directly to Question 10.

8. If you answered “YES” to the previous question, did defendant commit an act of infringement with respect to one or more copyrights of song titles owned by plaintiff Song BMG Music Entertainment?

YES _____

NO _____

9. If you answered “YES” to the previous question, you may award an amount of money that will fairly compensate Virgin Records America, Inc. If you answered “NO,” go directly to the next question.

\$_____

10. Did plaintiff Arista Records, LLC own the copyright to one or more of the song titles it claims defendant subjected to an act of infringement?

YES _____

NO _____

If you answered “NO,” go directly to Question 13.

11. If you answered “YES” to the previous question, did defendant commit an act of infringement with respect to one or more copyrights of song titles owned by plaintiff Arista Records, LLC.?

YES _____

NO _____

12. If you answered “YES” to the previous question, you may award an amount of money that will fairly compensate Arista Records, LLC. If you answered “NO,” go directly to the next question.

\$_____

13. Did plaintiff Interscope Records own the copyright to one or more of the song titles it claims defendant subjected to an act of infringement?

YES _____

NO _____

If you answered “NO,” go directly to Question 16.

14. If you answered “YES” to the previous question, did defendant commit an act of infringement with respect to one or more copyrights of song titles owned by plaintiff Interscope Records?

YES _____

NO _____

15. If you answered “YES” to the previous question, you may award an amount of money will fairly compensate Interscope Records. If you answered “NO,” go directly to the next question.

\$ _____

15. Did plaintiff Warner Bros. Records, Inc. own the copyright to one or more of the song titles it claims defendant subjected to an act of infringement?

YES _____ NO _____

If you answered "NO," go directly to Question 18.

16. If you answered "YES" to the previous question, did defendant commit an act of infringement with respect to one or more copyrights of song titles owned by plaintiff Warner Bros. Records, Inc.?

YES _____ NO _____

17. If you answered "YES" to the previous question, you may award an amount of money that will fairly compensate Warner Bros. Records, Inc. If you answered "NO," go directly to the next question.

\$ _____

18. Did plaintiff UMG Recordings, Inc. own the copyright to one or more of the song titles it claims defendant subjected to an act of infringement?

YES _____ NO _____

If you answered "NO," go directly to signature line below where the Jury Foreperson will sign and date this Verdict Form.

19. If you answered "YES" to the previous question, did defendant commit an act of infringement with respect to one or more copyrights of song titles owned by plaintiff UMG Recordings, Inc.?

YES _____ NO _____

20. If you answered "YES" to the previous question, you may award an amount of money that will fairly compensate UMG Recordings, Inc. If you answered "NO," go directly to signature line below where the Jury Foreperson will sign and date this Verdict Form.

\$ _____

SIGN AND DATE THE VERDICT:

SO SAY WE ALL, this _____ day of October, 2007.

(Print Jury Foreperson's Name)

(Jury Foreperson's Signature)

Dated: September 17 , 2007

Respectfully submitted by

CHESTNUT & CAMBRONNE, P.A.

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