

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

<p>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,</p> <p style="text-align: right;">Plaintiffs,</p> <p>v.</p> <p>Jammie Thomas,</p> <p style="text-align: right;">Defendant.</p>	<p>Case No. 06-cv-1497 (MJD/RLE)</p> <p style="text-align: center;"><b><u>DEFENDANT'S PROPOSED UNAGREED-UPON JURY INSTRUCTIONS</u></b></p>
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Attached hereto are Defendant Jammie Thomas' Proposed UnAgreed-Upon Jury Instructions indexed as follows:

<b>Pg.</b>	<b>Title</b>
1	Action for Copyright Infringement
2	2.08A Evidence Admitted Against Only One Party
3	3.04 Burden Of Proof
4	Proof of Plaintiff: Owner of Works Protected by Copyright Act
5	Each Plaintiff Claims in Each Case That the Defendant Violated its Exclusive Rights to Reproduce and Distribute its Copyrighted Works
6	§ 160.90 Generally- Virgin Records had a Valid Copyright
7	§ 160.90 Generally- Capitol Records Inc. had a Valid Copyright
8	§ 160.90 Generally- Sony BMG Music Entertainment had a Valid Copyright
9	§ 160.90 Generally- Arista Records LLC had a Valid Copyright
10	§ 160.90 Generally- Interscope Records had a Valid Copyright

11	§ 160.90 Generally- Warner Bros. Records Inc. had a Valid Copyright
12	§ 160.90 Generally- UMG Recordings Inc. had a Valid Copyright
13	§ 160.93 Statutory Damages

Dated: September 17, 2007

**CHESTNUT & CAMBRONNE, P.A.**

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