

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MICHELE SNOW, Individually and On :
Behalf Of All Others Similarly Situated, : 06 CV 00669 (RJH) (MHD)
:
Plaintiffs, :
:
- against - :
:
DOUBLEDAY, a division of RANDOM HOUSE, INC.; :
BANTAM DOUBLEDAY DELL PUBLISHING GROUP; :
RANDOM HOUSE, INC.; ANCHOR BOOKS, a division :
of RANDOM HOUSE, INC.; JAMES FREY, :
:
Defendants. :
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**DISCLOSURE STATEMENT PURSUANT TO
RULE 7.1(a) OF THE FEDERAL RULES OF CIVIL PROCEDURE**

Pursuant to Rule 7.1(a) of the Federal Rules of Civil Procedure, and to enable judges and magistrate judges of the Court to evaluate possible disqualification or recusal, the undersigned counsel of record for Random House, Inc. ("Random House")¹ (a private non-governmental party) certifies that Random House is a wholly owned subsidiary of Bertelsmann Publishing Group, Inc., a privately held corporation, which is in turn a wholly owned subsidiary of Bertelsmann, Inc., a privately held corporation. Bertelsmann, Inc. is a wholly owned subsidiary of Bertelsmann AG. The majority interest in Bertelsmann AG is privately owned; Group Bruxelles Lambert S.A., a publicly traded company, owns a minority interest in

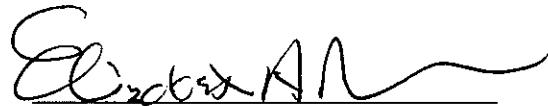
¹ In addition to defendants Random House and James Frey, the complaint purports to name as defendants "Doubleday, a division of Random House, Inc.", "Bantam Doubleday Dell Publishing Group" and "Anchor Books, a division of Random House, Inc.", none of which are separate corporate entities. Doubleday, Bantam Doubleday Dell Publishing Group and Anchor Books are divisions of Random House, Inc. Defendant Random House will move at the appropriate time to have these alleged parties dismissed from the action.

Bertelsmann AG. Undersigned counsel further certifies that there are no publicly held corporations which own 10% or more of Random House's stock.

Dated: New York, New York
February 28, 2006

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