

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ARISTA RECORDS LLC; ATLANTIC
RECORDING CORPORATION; BMG MUSIC;
CAPITOL RECORDS, INC.; ELEKTRA
ENTERTAINMENT GROUP INC.;
INTERSCOPE RECORDS; LAFACE
RECORDS LLC; MOTOWN RECORD
COMPANY, L.P.; PRIORITY RECORDS LLC;
SONY BMG MUSIC ENTERTAINMENT;
UMG RECORDINGS, INC.; VIRGIN
RECORDS AMERICA, INC.; and
WARNER BROS. RECORDS INC.,

Plaintiffs,

v.

LIME GROUP LLC; LIME WIRE LLC; MARK
GORTON; and GREG BILDSON, and M.J.G.
LIME WIRE FAMILY LIMITED
PARTNERSHIP

Defendants.

CIVIL ACTION NO. 06 CV. 5936
(GEL)

**DECLARATION OF JOSEPH D. COHEN IN SUPPORT
OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

I, Joseph D. Cohen, the undersigned, hereby declare as follows:

1. My name is Joseph D. Cohen. I am over eighteen years of age, of sound mind, and in all ways qualified and competent to make this declaration. I have personal knowledge of the facts contained in this declaration and they are true and correct.

2. I am licensed to practice law in the State of Texas and am admitted *pro hac vice* as an attorney of record for Defendants in this case.

3. Attached as Exhibit 1 are true and correct copies of deposition excerpts taken from the February 28, 2008 deposition of George O. White, III.

REDACTED VERSION – COMPLETE VERSION FILED UNDER SEAL

4. Attached as Exhibit 2 are true and correct copies of deposition excerpts taken from the April 8, 2008 deposition of Jennifer Cavanaugh.

5. Attached as Exhibit 3 are true and correct copies of deposition excerpts taken from the May 8, 2008 deposition of Allan Klepfisz.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed in Houston, Texas on July 17th, 2008.



Joseph D. Cohen

EXHIBIT 1

REDACTED

EXHIBIT 2

REDACTED

REDACTED VERSION – COMPLETE VERSION FILED UNDER SEAL

EXHIBIT 3

REDACTED

REDACTED VERSION – COMPLETE VERSION FILED UNDER SEAL