

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; GREG BILDSON, and M.J.G. LIME  
WIRE FAMILY LIMITED PARTNERSHIP

Defendants.

ECF CASE

CIVIL ACTION NO. 06 CV. 5936  
(GEL)

**DECLARATION OF ANURAG SINGLA**

1. My name is Anurag Singla. 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 was employed by Lime Wire LLC ("Lime Wire") from Jul, 2000 to Jan, 2002. I held the position of Software Engineer during that time frame. My job responsibilities and duties at Lime Wire were to development of Limewire server software as well as further enhancements of gnutella protocol to enable enterprise use of Limewire software, and my focus as a software developer at Lime Wire included development of server software as well as enhancing Limewire capabilities to enable xml searches that could enable content providers (for e.g. libraries, real estate sites, classified websites etc.) share their content through a unified P2P based interface,

enabling real time distributed searches.. One of my principal responsibilities was to develop the software code for the early versions of the LimeWire P2P software application.

3. During my time at Lime Wire, I worked closely with Adam Fisk, Greg Bildson, Chris Rohrs among others. Our goal as a software development team was to design and build P2P application that could enabled distributed searching for structured content with metadata.

4. I have reviewed the blog postings of Adam Fisk, which are attached hereto as Exhibits 1,2 and 3. I strongly disagree with Mr. Fisk's statements and opinions contained in these posts. First, I personally was not aware of any plan or discussion regarding the design of the LimeWire software application so as to enhance the ability of users to commit copyright infringement. To the contrary, our goal in designing and building LimeWire was to be the premiere content sharing application that allowed users to efficiently locate and download all sorts of digital content. For example, design features such as xml based structured queries, and enhancement of Gnutella protocol to enable these were implemented by Lime Wire so as to allow real time searching of content made available by various content providers.

5. It was never the plan or the goal of Lime Wire to design a piece of software that enhanced it's users ability to locate and download unauthorized content, and in particular, unauthorized music. I am personally not aware of any LimeWire feature that made it easier for users to share copyrighted content. Nor am I personally aware of any efforts by Lime Wire to

somehow protect any alleged infringing activity from detection. It is my personal opinion that LimeWire was not designed to maximize infringement based on my experience at Lime Wire.

6. In addition, it was never our goal to attract Napster users nor was it ever our goal to be the "next Napster". To the contrary, our goal was to distance ourselves from Napster.

7. I am also not aware of any Lime Wire employee that tested the LimeWire application by searching for or downloading unauthorized copyrighted works. In fact, developers at Lime Wire testing the software would typically use recipes as well as canned content that would match the queries using two or more machines.

8. Lime Wire added a media player as a feature to the software application because it can enable previewing the media file before it is fully downloaded. This would save bandwidth and time for a user if the user would not like to download the complete file. Lime Wire never added a similar feature for the viewing of images, videos or text documents because most users already have those applications on their computers, or because JAVA did not support such players, and also due to complexity of handling various different formats.

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 Mountain View, CA on September 6, 2008.

  
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Anurag Singla  
Anurag Singla