

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,

-against-

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

Defendants.

Civil No. 06 CV 5936 (KMW)

ECF Case

**MOTION FOR *PRO HAC VICE* ADMISSION
OF KELLY M. KLAUS**

FILED
U.S. DISTRICT COURT
2010 APR 22 PM 4:13
S.D. OF N.Y.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for
the Southern and Eastern Districts of New York, I, Robert W. Clarida, a member in good
standing of the bar of this Court, hereby move for an Order allowing admission *pro hac vice* of:

Kelly M. Klaus
Munger, Tolles & Olson LLP
355 South Grand Avenue
Thirty-Fifth Floor
Los Angeles, CA 90071-1560
Tel: (213) 683-9238
Fax: (213) 683-4038
Email: Kelly.Klaus@mto.com

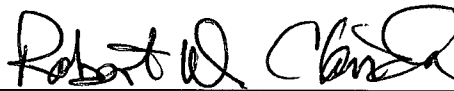
Kelly M. Klaus is a member in good standing of the Bar of the State of California.

2010 APR 22 2:20 PM
SES
SICOR

There are no pending disciplinary proceedings against Kelly M. Klaus in any State or Federal court.

Dated: New York, New York
April 20, 2010

Respectfully submitted,

By: 

Robert W. Clarida (RC 3190)
Cowan, Liebowitz & Latman, P.C.
1133 Avenue of the Americas
New York, New York 10036
Phone: (212) 790-9266

Attorney for Plaintiffs

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,

-against-

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

Defendants.

Civil No. 06 Civ. 5936 (KMW)

ECF CASE

**AFFIRMATION OF ROBERT W.
CLARIDA IN SUPPORT OF MOTION FOR
PRO HAC VICE ADMISSION OF KELLY
M. KLAUS**

I, Robert W. Clarida, declare under penalty of perjury under the laws of the United States and pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a member of the law firm of Cowan, Liebowitz & Latman, P.C., counsel for Plaintiffs in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit Kelly M. Klaus as counsel *pro hac vice* to represent Plaintiffs in this matter.
2. I am a member in good standing of the bar of the State of New York and I was admitted to practice in New York in 1994. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in

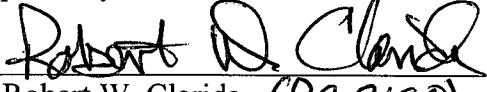
good standing with this Court.

3. Mr. Klaus is a partner in the law firm of Munger, Tolles & Olson LLP, in Los Angeles, California. A true and correct copy of Mr. Klaus's Certificate of Good Standing from the State Bar of California is attached hereto as Exhibit A.
4. I know Mr. Klaus to be a skilled attorney and of high moral character. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
5. Accordingly, I am pleased to move the admission of Kelly M. Klaus, *pro hac vice*.
6. I respectfully submit a proposed order granting the admission of Kelly M. Klaus, *pro hac vice*, which is attached hereto as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit Kelly M. Klaus, *pro hac vice*, to represent Plaintiffs in the above-captioned matter, be granted.

Dated: New York, New York
April 20, 2010

Respectfully submitted

By: 
Robert W. Clarida (RC 3190)
Cowan, Liebowitz & Latman, P.C.
1133 Avenue of the Americas
New York, New York 10036
Phone: (212) 790-9266

Attorney for Plaintiffs

EXHIBIT A



THE STATE BAR
OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

CERTIFICATE OF STANDING

April 12, 2010

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, KELLY MAX KLAUS, #161091 was admitted to the practice of law in this state by the Supreme Court of California on December 14, 1992; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

J. Robert McPhail
Custodian of Membership Records

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ARISTA RECORDS LLC; ATLANTIC
RECORDING CORPORATION; BMG
MUSIC; CAPITOL RECORDS, INC.;
ELEKTRA ENTERTAINMENT GROUP
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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,

-against-

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

Defendants.

Civil No. 06 CV 5936 (KMW)

ECF Case

**[PROPOSED] ORDER FOR ADMISSION *PRO*
HAC VICE ON WRITTEN MOTION**

Upon the motion of Robert W. Clarida, attorney for Plaintiffs, 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., and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Kelly M. Klaus
Munger, Tolles & Olson LLP
355 South Grand Avenue
Thirty-Fifth Floor
Los Angeles, CA 90071-1560
Tel: (213) 683-9238
Fax: (213) 683-4038
Email: Kelly.Klaus@mto.com

is admitted to practice *pro hac vice* as counsel for Plaintiffs, 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., in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. This action has been assigned to the Electronic Case Filing (ECF) system, and as such, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: April ____, 2010
New York, New York

The Honorable Kimba M. Wood
United States District Judge

**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 RECORDING, INC.; VIRGIN RECORDS AMERICA, INC.; and WARNER BROS. RECORDS INC.,

Plaintiffs,

v.

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

Defendants.

**06 Civ. 5936 (KMW)
ECF CASE**

CERTIFICATE OF SERVICE

State of New York)
)
County of New York) ss:

Florence O. Redona, being duly sworn, deposes and says:

1. I am not a party to the action, am over eighteen years of age, and reside in Jersey City, New Jersey 07306.

2. On April 21, 2010, I served true copies of:

(a) Motion for admission Pro Hac Vice of Glenn D. Pomerantz to represent plaintiffs, with supporting declaration

(b) Motion for admission Pro Hac Vice of Kelly M. Klaus to represent plaintiffs, with supporting declaration

in the above captioned matter, by depositing true copies thereof in post-paid wrappers, in an official depository under the exclusive care and custody of the U.S. Postal Service within the State of New York, addressed to:

Katherine B. Forrest, Esq.
CRAVATH, SWAINE & MOORE, LLP
Worldwide Plaza
825 Eighth Avenue
New York, New York 10019
Attorneys for Plaintiffs

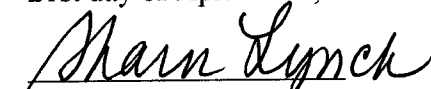
Michael S. Sommer, Esq.
WILSON SONSINI GOODRICH & ROSATI
1301 Avenue of the Americas, 40thFloor
New York, New York 10019
*Attorneys for Lime Wire LLC; Lime Group LLC;
Mark Gorton and M.J.G. Lime Wire Family
Limited Partnership, Defendants*

Charles S. Baker, Esq.
FULBRIGHT & JAWORSKI L.L.P.
Fulbright Tower
1301 McKinney, Suite 5100
Houston, Texas 77010-3095
*Attorneys for Lime Wire LLC; Lime Group
LLC; Mark Gorton and Lime Wire Family
Limited Partnership, Defendants*

Edward Hernstadt, Esq.
HERNSTADT ATLAS LLP
11 Broadway, Suite 105
New York, New York 10004
Attorneys for Greg Bildson, Defendant


FLORENCE O. REDONA

Sworn to before me this
21st day of April 2010, 2009.


Notary Public

SHARON LYNCH
NOTARY PUBLIC, State of New York
No. 30-4749261
Qualified in Nassau County
Certificate Filed in New York County
Commission Expires June 30, 20__//