

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/Counterclaim Defendants,

v.

LIME GROUP LLC; MARK GORTON; and GREG BILDSON,

Defendants,

and

LIME WIRE LLC,

Defendant/Counterclaim Plaintiff.

ECF CASE

06 Civ. 05936 (GEL)

NOTICE OF MOTION FOR
LEAVE TO FILE AN
AMENDED COMPLAINT

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Katherine B. Forrest, executed June 20, 2007, with exhibits thereto, and the June 20, 2007 Memorandum of Law in Support of Motion for Leave to File an Amended Complaint, and upon all other papers and prior proceedings herein, Plaintiffs hereby move this Court before the Honorable Gerard E. Lynch in Courtroom 6B, 500 Pearl Street, New York, New York, for an order pursuant to Fed. R. Civ. P. 15(a), 16(b), 19(a) and 21 granting Plaintiffs leave to file an amended complaint to join M.J.G. Lime Wire Family Limited Partnership as a defendant to the action; to add claims for fraudulent conveyance under

Section 276 of the New York Debtor and Creditor Law and for unjust enrichment under the common law of New York; and further relief as the court deems just and proper.

June 20, 2007

CRAVATH, SWAINE & MOORE LLP,

by



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