

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

Defendants.

Case No. 06 CV 5936 (KMW)

ECF Case

**DECLARATION OF  
JOHN ENRIGHT**

I, John Enright, the undersigned, hereby declare:

1. I am over twenty-one (21) years of age and am of sound mind. I have personal knowledge of the facts stated herein, I am competent to testify thereto, and if called to testify, I could and would testify to the following.
2. I am currently the Chief Operating Officer of Lime Labs LLC, a Delaware limited liability company incorporated in August 2006, and headquartered in New York. Lime Labs LLC is the 100% owner of Lime Labs India Pvt. Ltd., based in Noida, India and founded later in 2007 (collectively, "Lime Labs").
3. Lime Labs offers a variety of services that make it easy for businesses and individuals to create powerful and dynamic websites. These services include: LimeBits (www.limebits.com), an innovative website authoring application that allows users to design and publish websites using an intuitive drag and drop interface; LimeDomains (www.limedomains.com), an ICANN-accredited domain registrar and web hosting company that

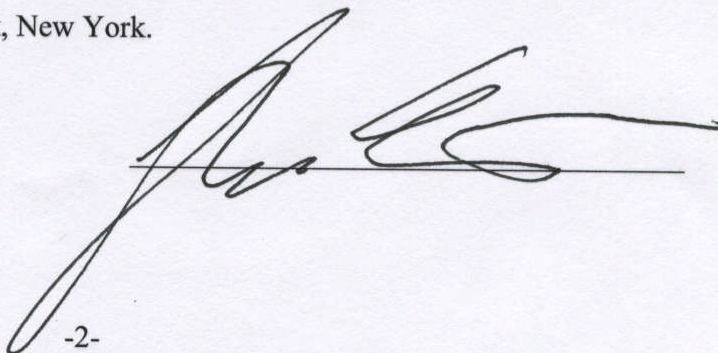


sells Internet domain names and web services; and LimeExchange ([www.limeexchange.com](http://www.limeexchange.com)), an on-line services marketplace where users can post a project and receive bids from qualified service providers all over the world. Lime Labs also provides certain software development services to Lime Wire. Lime Labs has over 6,000 paying customers, and over 100,000 users who use its free services.

4. Lime Labs currently employs twelve people in its New York office, and approximately ninety people in India. The employees in New York comprise the core corporate staff and an eight-person software development team. The employees in India work in a variety of different areas, and provide the bulk of Lime Labs support to its customers and users. Approximately 15 employees in India are dedicated customer service and sales representatives. Approximately 10 employees in India focus on the network and system operations, maintaining the network and related hardware that allow Lime Labs to provide its services. Approximately 10 employees work in an administrative capacity. And the remainder of the employees in India are software developers.

5. Mark Gorton is the principal shareholder in Lime Labs, and is responsible for approximately 85% to 90% of Lime Labs' funding in a given year. If Mr. Gorton were unable to provide this funding, Lime Labs would face significant challenges. We would have to terminate a large number of employees, and it would interrupt our ability to provide service to our customers.

I HEREBY DECLARE and certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this Declaration was executed this 30<sup>th</sup> day of June 2010 in New York, New York.



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