

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ARISTA RECORDS LLC; ATLANTIC
RECORDING CORPORATION; ARISTA
MUSIC, fka BMG MUSIC; CAPITOL
RECORDS LLC fka CAPITOL RECORDS,
INC.; ELEKTRA ENTERTAINMENT
GROUP INC.; INTERSCOPE RECORDS;
LAFACE RECORDS LLC; MOTOWN
RECORD COMPANY, L.P.; PRIORITY
RECORDS LLC; SONY MUSIC
ENTERTAINMENT, fka 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.

06 Civ. 05936 (KMW)
ECF CASE

**DECLARATION OF CHRIS CONNELLY IN SUPPORT OF PLAINTIFFS' MOTION
FOR PARTIAL SUMMARY JUDGMENT REGARDING DIRECT INFRINGEMENT OF
THE WORKS AT ISSUE**

I, Chris Connelly, the undersigned, hereby declare:

1. I am the Director of Data Collection at Peer Media Technologies, Inc. ("PMT").

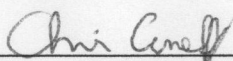
PMT is a leading provider of content protection, copyright enforcement and digital piracy measurement services for companies in the entertainment, software and publishing industries. I have been with PMT and its predecessor, MediaSentry Inc. ("MediaSentry"), since June 2004. I make this declaration upon personal knowledge, and if called as a witness I could and would testify competently to the facts stated herein.

2. Attached hereto as Exhibit A is a true and correct copy of the "Percipient Witness Statement of Chris Connelly," dated September 30, 2010, that I prepared in connection with this matter. The statements contained in this document were true and correct at the time they were made, and remain true and correct to this day.

3. In my September 30, 2010 "Percipient Witness Statement," I state that between 2004-2008 MediaSentry downloaded files containing Plaintiffs' copyrighted sound recordings "from the computers of users based within the United States who were utilizing the LimeWire client application." MediaSentry confirmed that these LimeWire users were located within the United States at the time of the download by using an Internet Protocol ("IP") address lookup database that determined the user's geographic location and Internet Service Provider ("ISP"). MediaSentry downloaded Plaintiffs' sound recording files from these users onto servers based in the United States.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: January 27, 2011
Boonton, New Jersey



Chris Connelly