

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

7011-31e  
SEE  
0058e10

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,

-against-

LIME WIRE LLC; LIME GROUP LLC; MARK GORTON; 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 HAILYN J. CHEN**

FILED  
U.S. DISTRICT COURT  
2011 FEB - 3 PM 4:42  
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:

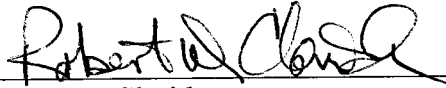
Hailyn J. Chen  
Munger, Tolles & Olson LLP  
355 South Grand Avenue  
Thirty-Fifth Floor  
Los Angeles, CA 90071-1560  
Tel: (213) 683-9100  
Fax: (213) 687-3702  
Email: Hailyn.Chen@mto.com

Hailyn J. Chen is a member in good standing of the Bar of the State of California.

There are no pending disciplinary proceedings against Hailyn J. Chen in any State or Federal court.

Dated: New York, New York  
February 3, 2011

Respectfully submitted,

By: 

Robert W. Clarida  
Cowan, Liebowitz & Latman, P.C.  
1133 Avenue of the Americas  
New York, New York 10036  
Phone: (212) 790-9266  
Email: rwc@cll.com  
*Attorney for Plaintiffs*

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,

-against-

LIME WIRE LLC; LIME GROUP LLC; MARK GORTON; 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 HAILYN J. CHEN**

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

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

Dated: New York, New York  
February 3, 2011

Respectfully submitted

By: 

Robert W. Clarida  
Cowan, Liebowitz & Latman, P.C.  
1133 Avenue of the Americas  
New York, New York 10036  
Phone: (212) 790-9266  
Email: rwc@cll.com  
*Attorney for Plaintiffs*



# THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

## CERTIFICATE OF STANDING

January 25, 2011

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, HAILYN JENNIFER CHEN, #237436 was admitted to the practice of law in this state by the Supreme Court of California on July 6, 2005; 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

Kath Lambert  
Custodian of Membership Records

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,

-against-

LIME WIRE LLC; LIME GROUP LLC; MARK GORTON; 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; Arista Music, formerly known as BMG Music; Capitol Records LLC, formerly known as Capitol Records, Inc.; Elektra Entertainment Group Inc.; Interscope Records; LaFace Records LLC; Motown Record Company, L.P.; Priority Records LLC; Sony Music Entertainment, formerly known as 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

Hailyn J. Chen  
Munger, Tolles & Olson LLP  
355 South Grand Avenue  
Thirty-Fifth Floor  
Los Angeles, CA 90071-1560  
Tel: (213) 683-9100  
Fax: (213) 687-3702  
Email: Hailyn.Chen@mto.com

is admitted to practice *pro hac vice* as counsel for Plaintiffs, Arista Records LLC; Atlantic Recording Corporation; Arista Music, formerly known as BMG Music; Capitol Records LLC, formerly known as Capitol Records, Inc.; Elektra Entertainment Group Inc.; Interscope Records; LaFace Records LLC; Motown Record Company, L.P.; Priority Records LLC; Sony Music Entertainment, formerly known as 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](http://nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: \_\_\_\_\_, 2011  
New York, New York

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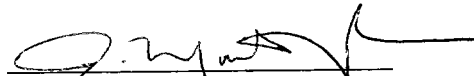
The Honorable Debra C. Freeman  
United States District Magistrate Judge

**CERTIFICATE OF SERVICE**

I, J. Martin Noble, hereby certify under penalty of perjury that a true and correct copy of the **MOTION FOR PRO HAC VICE ADMISSION OF HAILYN J. CHEN** was served, by first class mail, this 3<sup>rd</sup> day of February, 2011, upon the following:

Willkie Farr & Gallagher LLP  
787 Seventh Avenue  
New York, N.Y. 10019-6099  
Attn: Joseph T. Baio, Esq.  
Tariq Mundiya, Esq.  
Mary Jane Eaton, Esq.  
Todd G. Cosenza, Esq.

Dated: New York, New York  
February 3, 2011

  
\_\_\_\_\_  
J. Martin Noble