

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

**FURTHER DECLARATION OF SILDA PALERM IN SUPPORT OF PLAINTIFFS'  
MOTION FOR PARTIAL SUMMARY JUDGMENT REGARDING OWNERSHIP**

I, Silda Palerm, the undersigned, hereby declare:

1. I am Vice President and Senior Litigation Counsel for Warner Music Group ("WMG"). I have been employed as counsel for WMG at all times relevant to this declaration. In my capacity as in-house counsel for WMG, among other things, I manage and supervise litigation for WMG and its affiliates, including but not limited to Plaintiffs Atlantic Recording Corporation, Elektra Entertainment Group Inc., and Warner Brothers Records Inc. (collectively, the "WMG Plaintiffs"). If called upon to do so, I could and would competently testify to the matters stated herein.


2. In my original declaration (Paragraph 23) filed in support of Plaintiffs' Partial Summary Judgment Motion Regarding Ownership (the "Motion"), I provided testimony regarding the ownership of Eleksylum Music Inc., of which Plaintiff Elektra Entertainment Group Inc. owns 100% of the shares of common stock. This remains accurate and true. However, Eleksylum is a publishing company that was formerly known as Elektra/Asylum Records Music, Inc.

3. More relevant for the Motion, the thirty-two Elektra Certificates identifying "**Elektra/Asylum Records**" as the copyright claimant are owned and controlled by Plaintiff Elektra Entertainment Group Inc. because "Elektra/Asylum Records" was a division of Warner Communications Inc., which was itself a part of the Elektra Entertainment Group Division of Warner Communications Inc. Warner Communications Inc. subsequently contributed and assigned all of the copyright rights in the sound recordings held by the division at issue to Plaintiff Elektra Entertainment Group Inc. The contribution and assignment was made by Unanimous Consent of the Board of Directors of Warner Communications, Inc. This consent was previously produced and

attached to my original Declaration as Exhibit 8. A true and correct copy of a Secretary's Certificate confirming this consent is attached again to this Declaration as Exhibit 1.

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

Dated: March 1, 2011

  
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Silda Palerm