

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; and M.J.G. LIME WIRE FAMILY LIMITED PARTNERSHIP,

Defendants.

06 Civ. 05936 (KMW)  
ECF CASE

**DECLARATION OF MELINDA E. LEMOINE IN SUPPORT OF PLAINTIFFS'  
MOTION TO PRECLUDE CERTAIN PURPORTED EXPERT TESTIMONY BY ARAM  
SINNREICH**

Glenn D. Pomerantz (*pro hac vice*)  
Kelly M. Klaus (*pro hac vice*)  
Melinda E. LeMoine  
Susan T. Boyd (*pro hac vice*)  
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Date: March 2, 2011

1. I am a partner at the law firm of Munger, Tolles & Olson LLP, counsel of record for Plaintiffs. I make this Declaration in support of Plaintiffs' Motion To Preclude Certain Purported Expert Testimony by Aram Sinnreich. The contents of this Declaration are based upon my own personal knowledge, and if called upon to do so, I could and would testify competently to the matters stated herein.

2. Attached hereto as Exhibit 1 is a true and correct copy of the Expert Report of Aram Sinnreich.

3. Attached hereto as Exhibit 2 is a true and correct copy of the Rebuttal Expert Report of Dr. Stan J. Liebowitz.

4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the transcript of the deposition of Aram Sinnreich taken in this action.

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

Dated: March 2, 2011  
Los Angeles, CA

*s/Melinda E. LeMoine*

Melinda E. LeMoine