

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ARISTA RECORDS LLC; ATLANTIC RECORDING CORPORATION; ARISTA MUSIC, fka BMG MUSIC; 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 GROUP LLC; LIME WIRE LLC; MARK GORTON; GREG BILDSON; and M.J.G. LIME WIRE FAMILY LIMITED PARTNERSHIP,

Defendants.

ECF Case

06 CV 5936 (KMW)

**DECLARATION OF TARIQ MUNDIYA IN SUPPORT OF DEFENDANTS' BRIEF IN
OPPOSITION TO PLAINTIFFS' MOTION *IN LIMINE* TO PRECLUDE ANY
ARGUMENT OR EVIDENCE CONCERNING DEFENDANTS' PURPORTED BELIEF
IN THE LAWFULNESS OF THEIR CONDUCT**

I, Tariq Mundiya, declare as follows:

1. I am a member of the bar of this court and an attorney with the law firm of Willkie Farr & Gallagher LLP. This law firm represents Lime Group LLC, Lime Wire LLC, Mark Gorton, and M.J.G. Lime Wire Family Limited Partnership (collectively, "Defendants") in the above-captioned action.

2. I have personal knowledge of the facts set forth below. I submit this Declaration in support of Defendants' Brief In Opposition To Plaintiffs' Motion *In Limine* To Preclude Any Argument Or Evidence Concerning Defendants' Purported Belief In The Lawfulness Of Their Conduct.

3. A true and correct copy of an excerpt of the deposition of Mark Gorton dated April 15, 2008 is attached hereto as Exhibit A.

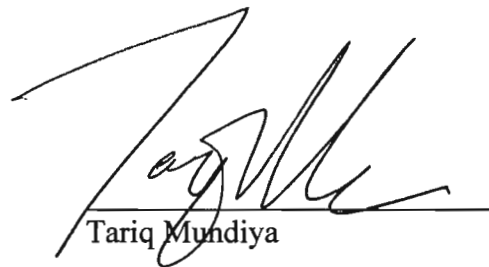
4. A true and correct copy of an excerpt of a transcript of the July 29, 2010 court conference in the above-captioned matter is attached hereto as Exhibit B.

5. A true and correct copy of an excerpt of the Declaration of Mark Gorton In Support of Defendants' Opposition To Plaintiffs' Motion For Preliminary Injunction Freezing Defendants' Assets, dated August 16, 2010, is attached hereto as Exhibit C.

6. A true and correct copy of an excerpt of the deposition of Mark Gorton dated April 14, 2008 is attached hereto as Exhibit D.

7. I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge and belief.

March 3, 2011 in New York, NY



Tariq Mundiya