

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

**SUPPLEMENTAL DECLARATION OF KELLY M. KLAUS IN SUPPORT
OF PLAINTIFFS' MOTION *IN LIMINE* TO PRECLUDE ANY
ARGUMENT OR EVIDENCE CONCERNING DEFENDANTS'
PURPORTED BELIEF IN THE LAWFULNESS OF THEIR CONDUCT**

I, Kelly M. Klaus, hereby declare as follows:

1. I am a partner in the law firm of Munger, Tolles & Olson LLP, counsel of record to Plaintiffs. I make this Supplemental Declaration in support of Plaintiffs' Motion *In Limine* to Preclude Any Argument or Evidence Concerning Defendants' Purported Belief in the Lawfulness of their Conduct. 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 additional excerpts of the July 29, 2010 Hearing on Plaintiffs' Motion for an Order Freezing Defendants' Assets.

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

Dated: March 7, 2011
Los Angeles, CA

/s/ Kelly M. Klaus

Kelly M. Klaus