

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X

VIACOM INTERNATIONAL INC.,	:	
COMEDY PARTNERS, COUNTRY MUSIC	:	
TELEVISION, INC., PARAMOUNT	:	
PICTURES CORPORATION,	:	
and BLACK ENTERTAINMENT	:	Case No. 1:07-CV-02103-LLS
TELEVISION LLC,	:	(Related Case No. 1:07-CV-03582-LLS)
	:	
Plaintiffs,	:	
	:	ECF Case
v.	:	
	:	<u>ELECTRONICALLY FILED</u>
YOUTUBE, INC., YOUTUBE, LLC, and	:	
GOOGLE INC.,	:	
	:	
Defendants.	:	

----- X

RULE 7.1 STATEMENTS OF AMICI CURIAE
AMERICAN SOCIETY OF COMPOSERS, AUTHORS AND PUBLISHERS,
BROADCAST MUSIC, INC., SESAC, INC., DISNEY ENTERPRISES, INC.,
NBC UNIVERSAL, INC., WARNER BROS. ENTERTAINMENT INC.,
ASSOCIATION OF AMERICAN PUBLISHERS, CENTER FOR THE RULE
OF LAW, INSTITUTE FOR POLICY INNOVATION, THE MEDIA INSTITUTE,
PICTURE ARCHIVE COUNCIL OF AMERICA, PROFESSIONAL PHOTOGRAPHERS
OF AMERICA, ROSETTA STONE LTD., AND ZUFFA, LLC IN SUPPORT OF PLAINTIFFS

Pursuant to Fed. R. Civ. P. 7.1 and to enable District Judges and Magistrate Judges of the Court to evaluate possible disqualifications or recusal, the undersigned counsel states as follows:

American Society of Composers, Authors and Publishers (“ASCAP”) certifies that it is an unincorporated membership association of composers of music, authors of lyrics, and music publishers. As an unincorporated entity, ASCAP is not required to file a Rule 7.1 disclosure.

Broadcast Music, Inc. (“BMI”) certifies that it has no parent corporation. The only publicly held company that directly or indirectly owns 10% or more of BMI’s stock is Gannett Co., Inc., through an indirect, wholly owned subsidiary.

SESAC, Inc. (“SESAC”) certifies that it has no parent corporation and no publicly held corporation owns 10% or more of SESAC’s stock.

Disney Enterprises, Inc. certifies that it is a wholly owned subsidiary of The Walt Disney Company, a publicly traded U.S. Corporation. No other publicly held corporation owns 10% or more of Disney Enterprises, Inc.

NBC Universal Inc. is indirectly wholly owned by the General Electric Company, a publicly traded U.S. company, and Vivendi S.A., a publicly traded French company.

Warner Bros. Entertainment Inc. certifies that it is ultimately and indirectly majority owned by Time Warner Inc., a publicly traded corporation.

Association of American Publishers (“AAP”) certifies that it is a non-profit trade association incorporated as a Section 501(c)(6) organization under the Internal Revenue Code. AAP has no parent entity and issues no stock, thus no publicly-traded company holds any stock in AAP.

Center for the Rule of Law (“Center”) certifies that it is an independent, non-profit educational corporation organized under Section 501(c)(3) of the Internal Revenue Code. The Center has no parent corporation and no publicly held corporation owns 10% or more of the Center’s stock.

Institute for Policy Innovation (“IPI”) certifies that it is an independent, non-profit corporation organized under Section 501(c)(3) of the Internal Revenue Code. IPI has no parent corporation and no publicly held corporation owns 10% or more of IPI’s stock.

The Media Institute certifies that it is a nonprofit, non-stock corporation organized under Section 501(c)(3) of the Internal Revenue Code. The Media Institute has no parent entity and no publicly traded company owns stock in The Media Institute.

Picture Archive Council of America (“PACA”) certifies that it is a not-for-profit trade association with no parent company. PACA does not issue stock.

Professional Photographers of America (“PPA”) certifies that it is a professional association organized under Section 501(c)(6) of the Internal Revenue Code. PPA has no parent corporation, has no stock and hence no shareholders.

Rosetta Stone Ltd. certifies that it is wholly owned subsidiary of Rosetta Stone Inc., a publicly-traded corporation.

Zuffa, LLC (“Zuffa”) certifies that it has no parent corporation and no publicly held corporation owns 10% or more of Zuffa’s stock.

Dated: May 7, 2010
Washington, D.C.

Respectfully submitted,

/s/ Mary E. Rasenberger
Clifford M. Sloan (*pro hac vice*)
(cliff.sloan@skadden.com)
Mary E. Rasenberger
(mary.rasenberger@skadden.com)
Christopher G. Clark
(christopher.clark@skadden.com)
SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
1440 New York Avenue, N.W.
Washington, D.C. 20005
(202) 371-7000

Counsel for American Society of Composers,
Authors and Publishers, Broadcast Music, Inc.,
SESAC, Inc., Disney Enterprises, Inc., NBC
Universal, Inc., Warner Bros. Entertainment Inc.,
Association of American Publishers, Center for the
Rule of Law, Institute for Policy Innovation,
The Media Institute, Picture Archive Council of
America, Professional Photographers of America,
Rosetta Stone Ltd., and Zuffa, LLC