

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

THE FOOTBALL ASSOCIATION PREMIER
LEAGUE LIMITED, BOURNE CO. (together
with its affiliate MURBO MUSIC PUBLISHING,
INC.), CHERRY LANE MUSIC PUBLISHING
COMPANY, INC., CAL IV ENTERTAINMENT
LLC, ROBERT TUR d/b/a LOS ANGELES
NEWS SERVICE, NATIONAL MUSIC
PUBLISHERS ASSOCIATION, THE RODGERS
& HAMMERSTEIN ORGANIZATION, STAGE
THREE MUSIC (US), INC., EDWARD B.
MARKS MUSIC COMPANY, FREDDY
BIENSTOCK MUSIC COMPANY d/b/a
BIENSTOCK PUBLISHING COMPANY,
ALLEY MUSIC CORPORATION, X-RAY DOG
MUSIC, INC., FEDERATION FRANCAISE DE
TENNIS, THE SCOTTISH PREMIER LEAGUE
LIMITED, THE MUSIC FORCE MEDIA
GROUP LLC, THE MUSIC FORCE LLC, and
SINDROME RECORDS, LTD. on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

YOUTUBE, INC., YOUTUBE, LLC and
GOOGLE, INC.,

Defendants.

ECF Case

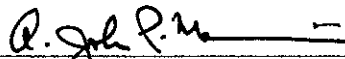
Civil Action No. 07-CV-3582 (LLS)
(Related Case No. 07-CV-2103)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the YouTube’s Memorandum of Law in Support of its Motion for Judgment on the Pleadings on Plaintiffs’ Punitive Damages Claim, Defendants YouTube, Inc., YouTube, LLC and Google Inc., by their undersigned counsel, will move this Court at the United States Courthouse, 500 Pearl Street, New York, New York, before the Honorable Louis L. Stanton, United States District Judge, for an Order dismissing or, in the alternative, striking Class Plaintiffs’ claims for (i) statutory damages for all unregistered foreign works, and (ii) punitive damages for all claims arising under the U.S. Copyright Act.

Dated: April 3, 2009

Respectfully submitted,



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