

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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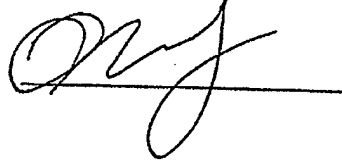
THE FOOTBALL ASSOCIATION PREMIER	:	
LEAGUE LIMITED, BOURNE CO. (together	:	<b>ECF Case</b>
with its affiliate MURBO MUSIC PUBLISHING,	:	
INC.), CHERRY LANE MUSIC PUBLISHING	:	<b>07 Civ. 3582 (LLS)</b>
COMPANY, INC., CAL IV ENTERTAINMENT	:	
LLC, ROBERT TUR d/b/a LOS ANGELES	:	
NEWS SERVICE, NATIONAL MUSIC	:	
PUBLISHERS' ASSOCIATION, THE	:	<b>DECLARATION OF OLIVER</b>
RODGERS & HAMMERSTEIN	:	<b>WEINGARTEN</b>
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., FÉDÉRATION	:	
FRANÇAISE DE TENNIS, THE MUSIC FORCE	:	
MEDIA GROUP LLC, THE MUSIC FORCE	:	
LLC, and SIN-DROME RECORDS, LTD. on	:	
behalf of themselves and all others similarly	:	
situated,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
YOUTUBE, INC., YOUTUBE, LLC and	:	
GOOGLE, INC.,	:	
	:	
Defendants.	:	

1. I am the Solicitor – Commercial and Intellectual Property of The Football Association Premier League Limited. I have been involved in this case from the outset and am responsible for causing the service of Advance Notices of Potential Infringement on the YouTube website.

2. In the period since 10 September 2008, the Premier League has caused to be served on YouTube more than three hundred and forty four "Advance Notices of Potential Infringement" (an "Advance Notice"). I attach a copy of one such Advance Notice as an example for the Court's reference, Ex. 1.
3. Each of these has been served on YouTube by email no less than 48 hours in advance of the first fixation and simultaneous transmission of a particular Premier League soccer match, identifies the particular match by title (the names of the teams), the date, specific time and expected duration of the intended first transmission and other information concerning that work, including the source of its intended first transmission, the parties responsible for recording the live event and the identity of the copyright owner, as well as a description of the activities which would, if carried out, constitute infringement, all as set forth in the attached example. YouTube acknowledges receipt of these electronically, as shown in Ex. 1.
4. In addition, the original copy of the Advance Notice bearing the actual handwritten signature on behalf of the Premier League has been served on YouTube by courier to DMCA Complaints, YouTube, Inc., 901 Cherry Ave., Second Floor, San Bruno, CA 94066, USA, so that they receive it before the first fixation and simultaneous transmission take place. We also receive written confirmation of YouTube's receipt of this original signed copy. See Ex. 1.
5. This practice has been followed for each of the hundreds of Advance Notices sent so far to YouTube on behalf of the Premier League.
6. I know that YouTube has, in fact, been receiving these Advance Notices. For example, on or about 11 September 2008 and 7 October 2008, emails from "the YouTube team" at YouTube were sent to Christopher Stokes of NetResult (Premier League's agent) and also to me, acknowledging YouTube's receipt of these Advance Notices. Copies of these emails from YouTube are attached at Ex.2.

I DECLARE UNDER PENALTY OF PERJURY OF THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

EXECUTED ON: 4/6/09  
AT: 30 Gloucester Place (London)

A handwritten signature in black ink, appearing to be 'MJ', written over a horizontal line.