

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

4/5/10
SCANNED

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., 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,

8901403 805 APR 0 2010 CL

The Football Association Premier League Limited et al v. Youtube, Inc. et al

Plaintiffs,

v.

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

Defendants.

ECF Case

07 Civ. 3582 (LLS)

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 4-19-10

NOTICE OF MOTION AND
MOTION TO ADMIT COUNSEL
PRO HAC VICE

Granted. No
opposition. So
ordered.
Louis L. Stanton
4/19/10

(Signature)

Doc. 222

Pursuant to Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I, John C. Browne, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Applicant's Name: Benjamin Galdston

Firm Name: Bernstein Litowitz Berger & Grossmann LLP

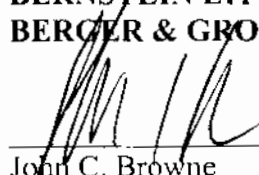
Address: 12481 High Bluff Drive, Suite 300
City/State/Zip: San Diego, California 92130-3582
Phone Number: (858) 793-0070
Fax Number: (858) 793-0323
Email Address: BenG@blbglaw.com

Benjamin Galdston is a member in good standing of the Bar of the State of California. There are no pending disciplinary proceedings against Benjamin Galdston in any State or Federal Court.

Dated: March 31, 2010

Respectfully submitted,

**BERNSTEIN LITOWITZ
BERGER & GROSSMANN LLP**



John C. Browne
1285 Avenue of the Americas
New York NY 10019
Telephone: (212) 554-1400
Fax: (212) 554-1444

*Co- Lead Counsel for Lead Plaintiffs,
Named Plaintiffs Murbo Music Publishing,
Inc., Cherry Lane Music Publishing
Company, Inc., Robert Tur d/b/a Los
Angeles News Service, X-Ray Dog Music,
Inc., Fédération Française de Tennis,
Premier League Limited, and for the
Prospective Class*



THE STATE BAR
OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

CERTIFICATE OF STANDING

March 26, 2010

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, BENJAMIN GALDSTON, #211114 was admitted to the practice of law in this state by the Supreme Court of California on December 7, 2000; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Kath Lambert".

Kath Lambert
Custodian of Membership Records

**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., 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.

ECF Case

07 Civ. 3582 (LLS)

**AFFIDAVIT OF JOHN C. BROWNE
IN SUPPORT OF MOTION TO
ADMIT COUNSEL *PRO HAC VICE***

State of New York)
) ss.
County of New York)

John C. Browne, being duly sworn, hereby deposes and says as follows:

I am a partner with Bernstein Litowitz Berger & Grossmann LLP, attorneys for Lead Plaintiffs, Named Plaintiffs Murbo Music Publishing, Inc., Cherry Lane Music Publishing

Company, Inc., Robert Tur d/b/a Los Angeles News Service, X-Ray Dog Music, Inc., Fédération Française de Tennis, Premier League Limited, and for the Prospective Class in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Lead Plaintiff's motion to admit Benjamin Galdston as counsel *pro hac vice* to represent the Lead Plaintiff in this matter.

I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1998. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

Mr. Galdston is an associate with Bernstein Litowitz Berger & Grossmann LLP in San Diego, California.

I have found Mr. Galdston to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

Accordingly, I am pleased to move the admission of Benjamin Galdston *pro hac vice*.

In compliance with Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I have attached a Certificate of Good Standing for Mr. Galdston from California issued within the past thirty days.

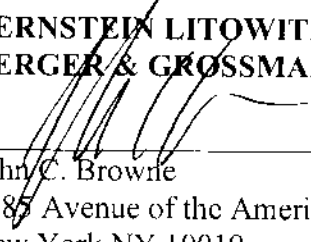
I respectfully submit a proposed order granting the admission of Benjamin Galdston, *pro hac vice*, which is also attached.

WHEREFORE, it is respectfully requested that the motion to admit Benjamin Galdston, *pro hac vice*, to represent Lead Plaintiffs, Named Plaintiffs Murbo Music Publishing, Inc., Cherry Lane Music Publishing Company, Inc., Robert Tur d/b/a Los Angeles News Service, X-Ray Dog Music, Inc., Fédération Française de Tennis, Premier League Limited, and for the Prospective Class, in the above-captioned matter, be granted.

Dated: March 31, 2010

Respectfully submitted,

**BERNSTEIN LITOWITZ
BERGER & GROSSMANN LLP**



John C. Browne
1285 Avenue of the Americas
New York NY 10019
Telephone: (212) 554-1400
Fax: (212) 554-1444

*Co- Lead Counsel for Lead Plaintiffs,
Named Plaintiffs Murbo Music Publishing,
Inc., Cherry Lane Music Publishing
Company, Inc., Robert Tur d/b/a Los
Angeles News Service, X-Ray Dog Music,
Inc., Fédération Française de Tennis,
Premier League Limited, and for the
Prospective Class*

State of New York)
)
County of New York)

ss.

Sworn to and subscribed before me
this 31 day of March, 2010.



Notary Public

YVETTE BADILLO
Notary Public, State of New York
No. 01BA6014697
Qualified in New York County
Commission Expires Oct 19, 2010

**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., 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.

ECF Case

07 Civ. 3582 (LLS)

**ORDER FOR ADMISSION *PRO*
HAC VICE ON WRITTEN MOTION**

Upon the motion of John C. Browne for Lead Plaintiffs, Named Plaintiffs Murbo Music Publishing, Inc., Cherry Lane Music Publishing Company, Inc., Robert Tur d/b/a Los Angeles News Service, X-Ray Dog Music, Inc., Fédération Française de Tennis, Premier League Limited, and for the Prospective Class, and said sponsor attorney's affirmation in support:

IT IS HEREBY ORDERED that:

Applicant's Name: Benjamin Galdston
Firm Name: Bernstein Litowitz Berger & Grossmann LLP
Address: 12481 High Bluff Drive, Suite 300
City/State/Zip: San Diego, California 92130-3582
Phone Number: (858) 793-0070
Fax Number: (858) 793-0323
Email Address: BenG@blbglaw.com

is admitted to practice *pro hac vice* as counsel for Lead Plaintiffs, Named Plaintiffs Murbo Music Publishing, Inc., Cherry Lane Music Publishing Company, Inc., Robert Tur d/b/a Los Angeles News Service, X-Ray Dog Music, Inc., Fédération Française de Tennis, Premier League Limited, and for the Prospective Class in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: _____

Louis L. Stanton
United States District Judge

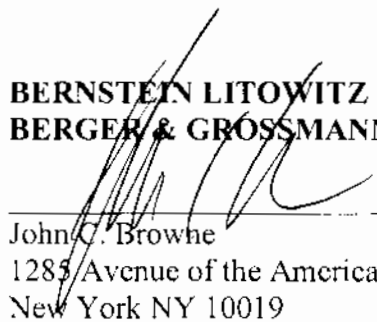
CERTIFICATE OF SERVICE

I, John C. Browne, hereby certify that I filed true and correct copies of the foregoing documents:

- NOTICE OF MOTION TO ADMIT COUNSEL *PRO HAC VICE*;
- AFFIDAVIT OF JOHN C. BROWNE IN SUPPORT OF MOTION TO ADMIT COUNSEL *PRO HAC VICE*; AND
- [PROPOSED] ORDER FOR ADMISSION *PRO HAC VICE* ON WRITTEN MOTION;

on ^{April}~~March~~ 2, 2010, with the Clerk of the Court and electronically served upon all counsel in this action.

**BERNSTEIN LITOWITZ
BERGER & GROSSMANN LLP**



John C. Browne
1285 Avenue of the Americas
New York NY 10019
Tel: 212-554-1400
Fax: 212-554-1444

*Co- Lead Counsel for Lead Plaintiffs,
Named Plaintiffs Murbo Music Publishing,
Inc., Cherry Lane Music Publishing
Company, Inc., Robert Tur d/b/a Los
Angeles News Service, X-Ray Dog Music,
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