

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 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.

Case No. 07 Civ. 3582 (LLS)

**REPLY DECLARATION OF
ELIZABETH ANNE FIGUEIRA
IN SUPPORT OF CLASS
PLAINTIFFS' MOTION FOR
PARTIAL SUMMARY
JUDGMENT**

I, Elizabeth Anne Figueira, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

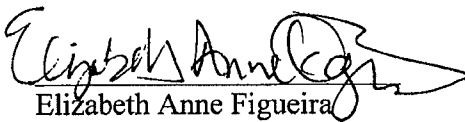
1. I am an attorney at Proskauer Rose LLP, proposed class counsel for the prospective class along with co-counsel Bernstein Litowitz Berger & Grossman LLP.

2. I submit this Declaration in support of class plaintiffs' Motion for Partial Summary Judgment. For the convenience of the Court, I refer back to my declaration that was submitted with class plaintiffs' Motion for Partial Summary Judgment on March 5, 2010, which attached Tabs 1-188, and my declaration that was submitted with class plaintiffs' Opposition to Defendants' Motion for Summary Judgment on April 30, 2010, which attached Tabs 189-338. This Declaration will continue with Tab 339.

3. Attached hereto at Tab 339 is a true and correct copy of the document Bates-stamped GOO001-06519634-6519638 produced by defendants in this action.

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

Dated: New York, New York
June 4, 2010


Elizabeth Anne Figueira