

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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WPIX, INC.,  
WNET.ORG,  
AMERICAN BROADCASTING COMPANIES, INC.,  
DISNEY ENTERPRISES, INC.,  
CBS BROADCASTING INC.,  
CBS STUDIOS INC.,  
THE CW TELEVISION STATIONS INC.,  
NBCUNIVERSAL MEDIA, LLC,  
NBC STUDIOS LLC,  
OPEN 4 BUSINESS PRODUCTIONS LLC,  
UNIVERSAL NETWORK TELEVISION, LLC,  
TELEMUNDO NETWORK GROUP LLC,  
WNJU BROADCASTING LLC,  
NBC TELEMUNDO LICENSE LLC,  
OFFICE OF THE COMMISSIONER OF BASEBALL,  
MLB ADVANCED MEDIA, L.P.,  
COX MEDIA GROUP, INC.,  
FISHER BROADCASTING-SEATTLE TV, L.L.C.,  
TWENTIETH CENTURY FOX FILM CORPORATION,  
FOX TELEVISION STATIONS, INC.,  
TRIBUNE TELEVISION HOLDINGS, INC.,  
TRIBUNE TELEVISION NORTHWEST, INC.,  
UNIVISION TELEVISION GROUP, INC.,  
THE UNIVISION NETWORK LIMITED PARTNERSHIP,  
TELEFUTURA NETWORK,  
WGBH EDUCATIONAL FOUNDATION,  
THIRTEEN,  
and PUBLIC BROADCASTING SERVICE,

Plaintiffs,

v.

IVI, INC. and TODD WEAVER,

Defendants.

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10 Civ. 07415-NRB


**DECLARATION OF CARLY SEABROOK**

I, **CARLY SEABROOK**, hereby declare, under penalty of perjury, that the following statements are true and correct, to my personal knowledge, except those stated upon information and belief, and as to all such facts stated upon information and belief, I am informed and believe that the same are true based on business records I understand are maintained in the regular course of business:

1. I am Director, Copyright Administration for NBCUniversal Media, LLC and its subsidiaries and affiliates. In this position I am responsible for, among other things, managing the filing of copyright registrations with the Copyright Office with respect to television programs and films owned by NBCUniversal and its subsidiaries and affiliates and maintaining an information database with respect to those registrations. I have held this title since approximately December 2010, have had primary responsibility for the foregoing job duties since April 2009, and before that I had similar primary responsibilities, except they were limited to television programs, not films.

2. I am informed and believe that attached as Exhibit 1 hereto is a non-exhaustive list of programs owned by NBC Studios LLC (formerly known as NBC Studios, Inc.), Universal Network Television, LLC, and Open 4 Business Productions LLC, that were broadcast on television stations affiliated with the NBC Television Network, a division of NBCUniversal, between September 13, 2010 and February 22, 2011 (either as original or repeat airings), and, in the case of one program, "House," on television stations affiliated with the FOX Television Network during the same period.

Executed on March 16, 2011.

  
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CARLY SEABROOK