

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 JAIME RODRIGUEZ

I, Jaime Rodriguez, hereby declare, under penalty of perjury, that the following statement is true and correct, to my personal knowledge.

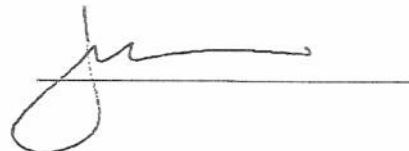
1. I am Vice President, Distribution, Sales & Marketing Business Affairs for Univision Communications Inc. ("UCI"). In this position I am responsible for overseeing the legal affairs related to the distribution of programming owned or controlled by UCI and its subsidiaries, including The Univision Network Limited Partnership, Telefutera Network, and Univision Television Group, Inc. (collectively "Univision"). I have held this position for one and a half (1 ½) years, and have been employed by UCI for six (6) years.

2. It is my understanding, based upon a press release issued by ivi, Inc., <http://www.prweb.com/releases/2010/09/prweb4487284.htm>, that on September 13, 2010, ivi began streaming copyrighted programming that was being broadcast on television stations in New York City and Seattle, Washington. It is also my understanding that ivi began streaming copyrighted programming from Los Angeles stations no later than November 30, 2010, <http://www.prweb.com/releases/2010/11/prweb4844164.htm>, and from Chicago stations no later than December 13, 2010, <http://www.prweb.com/releases/2010/12/prweb4890944.htm>.

3. Attached as Exhibit 1 hereto is a listing of programs owned by Univision broadcast on stations streamed by ivi between September 13, 2010 and the issuance of the district court's injunction on February 22, 2011. As indicated on Exhibit 1, these programs were broadcast on New York television stations WFUT and WXTV and Los Angeles station KMEX.

4. I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 16, 2011.

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