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 CAPITOL RECORDS, LLC

UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK

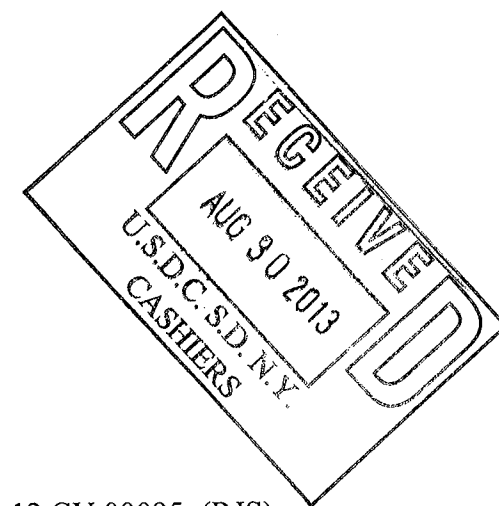
-----X  
 CAPITOL RECORDS, LLC,

Plaintiff,

-against-

REDIGI INC., JOHN OSSENMACHER and  
 LARRY RUDOLPH a/k/a LAWRENCE S.  
 ROGEL,

Defendants.  
 -----X



12 CV 00095 (RJS)

**FIRST AMENDED COMPLAINT**

Plaintiff Capitol Records, LLC ("Plaintiff"), by and through its undersigned attorneys, as  
 and for its First Amended Complaint, alleges as follows:

**INTRODUCTION**

1. This action is for copyright infringement, contributory copyright infringement, vicarious copyright infringement, and inducement of copyright infringement under the United States Copyright Act, as well as common law copyright infringement under the law of the State of New York, all arising from Defendants' willful and systematic infringement of Plaintiff's sound recordings.

2. Defendants own and operate the "ReDigi" music service, which holds itself out as the first online marketplace for "used" or "recycled" digital music files. With a stated purpose of helping consumers buy and sell "used" digital music files, ReDigi makes and assists its users in making systematic, repeated and unauthorized reproductions and distributions of Plaintiff's

copyrighted sound recordings. ReDigi's technology at issue in this case (designated as "ReDigi 1.0") was developed to upload copies of copyrighted sound recordings to its service for interested "sellers," and then download copies for and to interested buyers, in order to build a user base and earn profits for Defendants from their infringing conduct.

3. While ReDigi has touted its service as the equivalent of a used record store, that analogy is inapplicable: used record stores do not make copies to fill their shelves. ReDigi is actually a clearinghouse for copyright infringement and a business model built on widespread, unauthorized copying of sound recordings owned by Plaintiff and others. Plaintiff brings this lawsuit to halt Defendants' infringement of Plaintiff's copyrighted works and to recover damages for the harm caused by Defendants' activities.

#### **THE PARTIES**

4. Plaintiff Capitol Records, LLC ("Capitol") is a Delaware limited liability company with its principal place of business at 150 Fifth Avenue, New York, New York 10011.

5. Upon information and belief, Defendant ReDigi Inc. ("Defendant" or "ReDigi") is a Delaware corporation with its principal place of business at Cambridge Innovation Ctr., 14<sup>th</sup> Floor, 1 Broadway, Cambridge, MA 02142.

6. Upon information and belief, Defendant John Ossenmacher ("Ossenmacher") is an individual residing in Cambridge, MA. Mr. Ossenmacher is the Chief Executive Officer and a founding owner of ReDigi.

7. Upon information and belief, Defendant Larry Rudolph a/k/a Lawrence Rogel ("Rudolph") is an individual residing in Cambridge, MA. Mr. Rudolph is the Chief Technology Officer and a founding owner of ReDigi.

## **JURISDICTION AND VENUE**

8. This civil action seeks injunctive relief and damages for copyright infringement under the Copyright Act, 17 U.S.C. § 101 et seq., and for common law copyright infringement under New York law with respect to Plaintiff's sound recordings fixed prior to February 15, 1972.

9. This Court has subject matter jurisdiction over the federal copyright claims under 28 U.S.C. §§ 1331 and 1338(a), and has supplemental jurisdiction over the related state law cause of action under 28 U.S.C. § 1367(a), inasmuch as that claim is so related to the federal claims as to form part of the same case or controversy.

10. This Court has personal jurisdiction over Defendants because, on information and belief, Defendants transact business in New York State and have committed tortious acts both within and outside New York causing injury in New York.

11. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(b) and 1400(a).

## **FACTS**

### **Plaintiff's Business**

12. Plaintiff is a well known record company engaged in the business of producing, manufacturing, distributing, selling, licensing and facilitating the distribution and sale of sound recordings in the United States. Plaintiff's reputation as a producer of sound recordings of high artistic and technical quality is known in New York, and throughout both the United States and the world.

13. Plaintiff is the copyright owner or owner of exclusive rights (by way of agreement) with respect to an extensive and diverse catalog of sound recordings, including those

of such famous recording artists as the Beatles, Norah Jones and Katy Perry to name just some. Under the Copyright Act, Plaintiff has the exclusive rights, among other things, to “reproduce the copyrighted work[s]” and “distribute copies or phonorecords of the copyrighted work[s] to the public,” as well as to authorize or license others to engage in such activities. 17 U.S.C. § 106.

14. Additionally, Plaintiff has entered into various agreements by which it obtained the common law copyrights in sound recordings embodying certain performances that were initially “fixed” prior to February 15, 1972 (the “Pre-1972 Recordings”). These performances are subject to protection under state law rather than federal copyright law, and the Copyright Act cannot be used to “annul[] or limit[]” those rights “until February 15, 2067.” 17 U.S.C. § 301(c). Pursuant to these agreements and New York common law, Plaintiff possesses, among other things, the exclusive and complete rights to manufacture, reproduce, distribute and sell the Pre-1972 Recordings.

15. In addition to manufacturing, distributing, selling and licensing phonorecords in the form of CDs, cassettes and other tangible media, Plaintiff also distributes and licenses its sound recordings in the form of digital audio files, which are marketed and distributed online in a variety of forms (e.g., permanent downloads, conditional downloads, subscription services, streaming, etc.), and delivered to the consumer via the Internet. Legitimate avenues for the digital distribution of music exist through authorized services, such as Apple’s iTunes, Spotify and Amazon’s MP3 Music Service, which provide these sound recordings for consumers pursuant to agreements that the services negotiated with Plaintiff.

16. Plaintiff has invested and continues to invest significant money, time, effort and creative talent to discover and develop recording artists, and to create, manufacture, advertise,

promote, sell and license sound recordings embodying the performances of its exclusive recording artists. Plaintiff, its recording artists and others in the music industry are compensated for their creative efforts and monetary investments largely from the sale and distribution of their sound recordings to the public, and from other exploitation of such sound recordings.

17. A list of federally copyrighted sound recordings for which Plaintiff has the right to sue for infringement pursuant to 17 U.S.C. §501(b) and that have been illegally reproduced and distributed by or for users of Defendants' ReDigi 1.0 service is attached hereto as Exhibit A. This list includes sound recordings for which Plaintiff is the copyright owner or owner of exclusive rights (by way of agreement) or was the copyright owner or owner of exclusive rights (by way of agreement) at the time of infringement and has retained the right to sue for such past infringements. Plaintiff has received Certificates of Copyright Registration from the Register of Copyrights for these copyrighted sound recordings.

18. A list of Pre-1972 Recordings in which Plaintiff holds exclusive rights under New York and other state laws and which have been illegally reproduced and distributed by or for users of Defendant's ReDigi 1.0 service is attached hereto as Exhibit B.

### **Defendants and Their Illegal Business**

19. Upon information and belief, Defendants own and operate the ReDigi website and service located at [www.redigi.com](http://www.redigi.com). Launched in 2011 as part of a test and "inventory build" phase, ReDigi styled itself as "the world's first and only online marketplace for used digital music" and boasted that its service allows users to "buy used digital music from others at a fraction of the price currently available on iTunes."

20. Although the ReDigi website cryptically claimed that its "genius" was "to facilitate the transfer of a digital music file from one user to another without copying or file

sharing,” the entire service and business model were predicated upon making and assisting users in making multiple, unauthorized copies and distributions of sound recordings owned by Plaintiff and others.

21. ReDigi’s pre-launch press release revealed how selling digital music via its service necessarily entailed making copies of sound recordings. According to the press release, after downloading ReDigi’s proprietary “Music Manager” software, users designated the songs they wished to sell from their desktop computers. “Eligible” tracks were then allegedly removed from the user’s computer and “synced” devices, “stored in the ReDigi cloud and offered for sale on ReDigi’s website.”

22. The track “stored” in and offered to consumers from ReDigi’s “cloud” was necessarily a *copy* of the user’s original file, which ReDigi purportedly deleted from the user’s hard-drive. The user’s original file was duplicated and then stored by the ReDigi service in the new tangible, material object of the ReDigi “cloud,” regardless of whether the user’s original file remained on his or her computer or was deleted.

23. As ReDigi’s press release explained, “When the song is purchased, the track and license will be instantly transferred to its new owner.” That new owner is then provided access to the cloud copy of the recording, which is an unauthorized reproduction of the recording with which the seller began.

24. The tutorial video on ReDigi’s website homepage similarly highlighted the copying that is made of the sound recordings offered for sale or sold via the ReDigi website. The video encouraged users first to download the “ReDigi Desktop Client” to open a ReDigi account and begin selling “used” digital files. After the user chooses and confirms the tracks he or she wished to sell, “ReDigi will *upload your songs for sale* and clean all of those unwanted

files off your computer.” Uploading, by its very nature, can only be accomplished by making an unauthorized copy of the original user’s track. The user does not “sell” that original track but merely agrees to its deletion after it has been copied.

25. The video then continued that interested purchasers can designate songs they wish to buy from any computer, after which those songs are “safely stored in the ReDigi Cloud.” Users were urged, “you’ll be able to buy a song from any computer, and *download* it later to your computer.” Downloading again presupposes the making of additional copies of the file that resided on the original user’s computer.

26. Defendants offered ReDigi users various incentives to encourage and induce them to participate in the unauthorized reproduction and distribution of Plaintiff’s sound recordings. For example, the video tutorial explained that for each song uploaded, a user earned “ReDigi coupons” which could be used to buy additional songs for a “discounted price.” Likewise, when those uploaded songs were sold, the original user earned ReDigi “credits” that could be applied to the purchase of new songs.

27. Further encouraging infringement, the ReDigi website homepage offered contests and incentives urging users to avail themselves of the service. The homepage promised, “Store or Sell at Least 10 MP3s on the ReDigi Cloud and be Entered to Win” prizes ranging from a Fiat sports car to headphones. Moreover, by simply storing those 10 songs for purposes of later resale, the user was promised, “Get 5 FREE songs just for storing 10 songs on ReDigi.”

28. Upon information and belief, in making and encouraging these various unauthorized reproductions and distributions, Defendants hoped to build a large user-base and corresponding profits. According to a ReDigi spokeswoman quoted in a November 14, 2011 New York Times article, ReDigi sells tracks for approximately 79 cents, and earns a commission

for each sale. That commission totals 60% of the purchase price.

29. In short, Defendants' business model was designed to build a customer base and earn profits by infringing and encouraging ReDigi users to infringe copyrighted sound recordings, including those owned by Plaintiff. Without these infringing acts, Defendants would have no service to offer.

30. Defendants have sought to excuse their activities legally in various public statements, but none justify their infringing conduct.

31. Defendants promised, for example, that their "Verification Engine" analyzed each file uploaded for sale to ensure that the track was "legally downloaded" by the user in the first instance and thus "eligible for sale." Given the widespread piracy of sound recordings on the internet, it is questionable whether Defendants can effectively screen files as lawfully obtained in the first instance.

32. Regardless, even if lawfully obtained, such files may not be reproduced for purposes of resale. By urging users to upload their content for resale, Defendants encouraged those users to infringe copyrights.

33. ReDigi's website also boasted that after a file was "verified" for eligibility, ReDigi ensured that the original user would not "willfully use/possess any copies of the sold item," presumably by deleting the original source file from the user's computer and synchronized devices. But even ReDigi's founder and CEO, Ossenmacher, has acknowledged publicly that there is no way to ensure absolutely that users are not retaining copies of the files they upload to ReDigi's service, perhaps on other devices or media that ReDigi's software cannot reach. Regardless, even if the source file is effectively deleted from a user's computer, an infringing copy of that file must be uploaded and downloaded – copied – for the ReDigi 1.0 service to



function.

34. Finally, ReDigi protested on its website that its service was protected by the “First Sale Doctrine” codified at 17 U.S.C. §109, which permits “owners of a particular copy or phonorecord lawfully made under this title ... to sell” that copy or phonorecord. Defendants, however, are not “owners” of any such lawfully made copy, nor have Defendants or their users disposed of the actual “particular copy” with which the seller began. Rather, Defendants and their users made and distributed unauthorized copies of that original file.

35. The Copyright Act defines “copy” and “phonorecord” as material objects in which a work or sounds are fixed, respectively. Neither Defendants nor their users have resold the original material object that resided on the original user’s computer. Rather, in violation of Plaintiff’s rights of reproduction, Defendants and their users duplicated digital files both in uploading and downloading discrete copies distinct from the original file that originally resided on a user’s computer.

36. Beyond their own infringing conduct, Defendants materially contributed to and induced infringing conduct by its users. Defendants knowingly and willfully offered them financial incentives for participating in unauthorized reproductions and distributions of Plaintiff’s sound recordings. Defendants encouraged those users to commit copyright infringement, and essentially created a marketplace where users engaged in widespread infringement.

37. Defendants Ossenmacher and Rudolph personally participated in, and supervised and directed, the infringing acts described above. Indeed, they personally conceived of the infringing business model and technology at issue in this case, were the ultimate decision makers concerning the development and implementation of such infringing activity and directed and

approved all key aspects of ReDigi's activities found by this Court to infringe Capitol's copyrights. They were the moving force behind those infringing acts.

38. Defendants' aggressive promotion of their service has resulted in many of Plaintiff's best-selling, most valuable sound recordings being infringed via the ReDigi service. A list of the federally registered, copyrighted sound recordings owned by Capitol and infringed by Defendants using the ReDigi 1.0 technology at issue in this case (as described in detail above) is attached as Exhibit A. A corresponding list of Pre-1972 sound recordings owned by Plaintiff and infringed by Defendants using the ReDigi 1.0 technology is attached as Exhibit B.

39. The Recording Industry Association of America ("RIAA"), a trade association whose members, including Plaintiff, create, manufacture and distribute sound recordings legitimately sold in the United States, notified ReDigi in November 2011 that its service violated Plaintiff's and other RIAA members' copyrights and demanded that ReDigi cease and desist from any further infringement.

40. Defendants refused to halt their infringing use of the ReDigi 1.0 technology described above and at issue in this case until the Court issued its summary judgment ruling in this case on March 30, 2013 finding ReDigi liable for direct and contributory infringement.

41. As a result of ReDigi's unlawful actions, Plaintiff has been damaged and has suffered, and continues to suffer, irreparable injury for which it has no adequate remedy at law. An injunction is necessary to ensure that Defendants permanently cease any further use of the ReDigi 1.0 technology to infringe Capitol's sound recordings.

**COUNT 1**  
**(Copyright Infringement)**

42. Plaintiff repeats and realleges the allegations set forth in paragraphs 1-41 above with the same force and effect as if set forth fully herein.

43. Defendants have engaged in the unauthorized reproduction and distribution of Plaintiff's copyrighted sound recordings listed in Exhibit A hereto. As a result, Defendants are liable for copyright infringement of Plaintiff's exclusive rights of reproduction and distribution under 17 U.S.C. § 106.

44. The infringement of Plaintiff's rights in each of its copyrighted sound recordings constitutes a separate and distinct act of infringement.

45. Defendants' acts of infringement are willful, intentional and purposeful, in disregard of Plaintiff's rights.

46. As a direct and proximate result of Defendants' infringement of Plaintiff's copyrights, Plaintiff is entitled to maximum statutory damages, in the amount of \$150,000 per work infringed, pursuant to 17 U.S.C. § 504(c), or for such other amount as may be proper pursuant to 17 U.S.C. § 504(c).

47. Unless and until Defendants' conduct is enjoined by this Court, they will continue to cause irreparable injury that cannot fully be compensated for or measured in money, and Plaintiff is accordingly also entitled to an injunction pursuant to 17 U.S.C. § 502 prohibiting further infringement of its exclusive rights under copyright.

48. Plaintiff is further entitled to attorneys' fees and costs pursuant to 17 U.S.C. § 505.

## **COUNT II** **(Inducement of Copyright Infringement)**

49. Plaintiff repeats and realleges the allegations set forth in paragraphs 1-48 above with the same force and effect as if set forth fully herein.

50. ReDigi users have engaged in the unauthorized reproduction and distribution of Plaintiff's copyrighted sound recordings listed in Exhibit A. As a result, such users are liable for

direct copyright infringement of Plaintiff's exclusive rights of reproduction and distribution under 17 U.S.C. § 106.

51. Each one of these users' infringing acts has been encouraged and made possible by Defendants, whose object is to promote the unlawful reproduction and distribution of Plaintiff's and others' sound recordings.

52. Defendants' inducement of copyright infringement is apparent from their active promotion of their ability to assist users in making unauthorized copies and sales of Plaintiff's and others' sound recordings, and Defendants' adoption of a business model that depends upon a high volume of infringement to create a user base and generate sales commissions.

53. As a result of the foregoing, Defendants are liable under the Copyright Act for inducing the infringing acts of their users, in violation of Sections 106 and 501 of the Copyright Act.

54. The infringement of Plaintiff's rights in each of its copyrighted sound recordings constitutes a separate and distinct act of infringement.

55. Defendants' acts of infringement are willful, intentional and purposeful, in disregard of Plaintiff's rights.

56. As a direct and proximate result of Defendants' infringement of Plaintiff's copyrights, Plaintiff is entitled to maximum statutory damages, in the amount of \$150,000 per work infringed, pursuant to 17 U.S.C. § 504(c), or for such other amount as may be proper pursuant to 17 U.S.C. § 504(c).

57. Unless and until Defendants' conduct is enjoined by this Court, they will continue to cause irreparable injury that cannot fully be compensated for or measured in money, and Plaintiff is accordingly also entitled to an injunction pursuant to 17 U.S.C. § 502 prohibiting

further infringement of its exclusive rights under copyright.

58. Plaintiff is further entitled to attorneys' fees and costs pursuant to 17 U.S.C. § 505.

**COUNT III**  
**(Contributory Copyright Infringement)**

59. Plaintiff repeats and realleges the allegations set forth in paragraphs 1-58 above with the same force and effect as if set forth fully herein.

60. ReDigi users have engaged in the unauthorized reproduction and distribution of Plaintiff's copyrighted sound recordings listed in Exhibit A. As a result, such users are liable for direct copyright infringement of Plaintiff's exclusive rights of reproduction and distribution under 17 U.S.C. § 106.

61. Defendants had actual and constructive knowledge of their users' infringing activity and materially contributed to that activity by promoting Defendants' ability to help users make and sell unauthorized copies of sound recordings, including those owned by Plaintiff. Defendants provided its users with software to facilitate unauthorized copying, and awarded users "coupons" or "credits" towards future purchases every time they uploaded a song for "sale" or succeeded in distributing a track, thus urging and contributing to infringing conduct.

62. Moreover, Defendants were notified of such infringing conduct by the RIAA, but refused to take the necessary action to halt that conduct.

63. As a result of the foregoing, Defendants are liable under the Copyright Act for contributorily infringing Plaintiff's copyrights, in violation of Sections 106 and 501 of the Copyright Act.

64. The infringement of Plaintiff's rights in each of its copyrighted sound recordings constitutes a separate and distinct act of infringement.

65. Defendants' acts of infringement are willful, intentional and purposeful, in disregard of Plaintiff's rights.

66. As a direct and proximate result of Defendants' infringement of Plaintiff's copyrights, Plaintiff is entitled to maximum statutory damages, in the amount of \$150,000 per work infringed, pursuant to 17 U.S.C. § 504(c), or for such other amount as may be proper pursuant to 17 U.S.C. § 504(c).

67. Unless and until Defendants' conduct is enjoined by this Court, they will continue to cause irreparable injury that cannot fully be compensated for or measured in money, and Plaintiff is accordingly also entitled to an injunction pursuant to 17 U.S.C. § 502 prohibiting further infringement of its exclusive rights under copyright.

68. Plaintiff is further entitled to attorneys' fees and costs pursuant to 17 U.S.C. § 505.

#### **COUNT IV (Vicarious Copyright Infringement)**

69. Plaintiff repeats and realleges the allegations set forth in paragraphs 1-68 above with the same force and effect as if set forth fully herein.

70. ReDigi users have engaged in the unauthorized reproduction and distribution of Plaintiff's copyrighted sound recordings listed in Exhibit A. As a result, such users are liable for direct copyright infringement of Plaintiff's exclusive rights of reproduction and distribution under 17 U.S.C. § 106.

71. Defendants had the legal right and actual ability to supervise and control the infringing activities that occurred through their site and service. Their website noted that if users were uncertain about the legal origins of their songs, "... don't sweat it. If you aren't sure where it [the user's music file] came from, we'll help you figure it out." Defendants also insisted that

they can identify and take action against repeat infringers, and explained that they would terminate the account of those who retained files Defendants believe they have “cleaned” out of sellers’ computers. Defendants have further admitted that they are intimately involved in supervising the sale and offers for sale of recordings via ReDigi 1.0.

72. Defendants nevertheless refused to exercise any control over the illegal reproduction of copyrighted music, and as a direct and proximate result of such failure, ReDigi users have infringed Plaintiff’s copyrighted sound recordings, including those listed in Exhibit A.

73. Defendants derived direct and substantial financial benefits from the infringements of Plaintiff’s copyrighted sound recordings occurring via its 1.0 service. In addition to attracting a user base, Defendants charged a percentage sales commission when unauthorized recordings were sold via the ReDigi site.

74. As a result of the foregoing, Defendants are liable under the Copyright Act for vicariously infringing Plaintiff’s copyrights, in violation of Sections 106 and 501 of the Copyright Act.

75. The infringement of Plaintiff’s rights in each of its copyrighted sound recordings constitutes a separate and distinct act of infringement.

76. Defendants’ acts of infringement are willful, intentional and purposeful, in disregard of Plaintiff’s rights.

77. As a direct and proximate result of Defendants’ infringement of Plaintiff’s copyrights, Plaintiff is entitled to maximum statutory damages, in the amount of \$150,000 per work infringed, pursuant to 17 U.S.C. § 504(c), or for such other amount as may be proper pursuant to 17 U.S.C. § 504(c).

78. Unless and until Defendants’ conduct is enjoined by this Court, they will continue

to cause irreparable injury that cannot fully be compensated for or measured in money, and Plaintiff is accordingly also entitled to an injunction pursuant to 17 U.S.C. § 502 prohibiting further infringement of its exclusive rights under copyright.

79. Plaintiff is further entitled to attorneys' fees and costs pursuant to 17 U.S.C. § 505.

**COUNT V**  
**(Common Law Copyright Infringement)**

80. Plaintiff repeats and realleges the allegations set forth in paragraphs 1-79 above with the same force and effect as if set forth fully herein.

81. The Pre-1972 Recordings are subject to common law copyright protection under New York law. As the owner of valid common law copyrights in the Pre-1972 Recordings, Plaintiff possesses the exclusive rights to sell, copy and distribute these recordings.

82. Plaintiff has not granted or licensed Defendants the right to copy or distribute the Pre-1972 Recordings in any manner, including by digital transmission. Defendants' conduct as described above constitutes infringement of Plaintiff's common law copyrights in the Pre-1972 Recordings listed in Exhibit B hereto.

83. The infringement of Plaintiff's rights in each of its Pre-1972 Recordings constitutes a separate and distinct act of infringement.

84. As a direct and proximate result of Defendants' violation of Plaintiff's rights in and to the Pre-1972 Recordings, Plaintiff has suffered damages in an amount to be proven at trial. Plaintiff is entitled to recover all proceeds and other compensation received or to be received by Defendants arising from their infringement of Plaintiff's Pre-1972 Recordings, and is entitled to an accounting to ascertain the amount of such profits and compensation.

85. Defendants' acts of infringement are willful, intentional and purposeful, in



disregard of Plaintiff's rights, and Plaintiff is entitled to punitive damages in addition to actual damages.

86. Unless and until Defendants' conduct is enjoined by this Court, they will continue to cause irreparable injury that cannot fully be compensated for or measured in money, and Plaintiff is accordingly also entitled to an injunction prohibiting Defendants from further violating Plaintiff's rights in the Pre-1972 Recordings.

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in its favor and against the Defendants as follows:

A. On all Counts, for such permanent injunctive relief as is necessary to prevent or restrain infringement of Plaintiff's copyrights, including a preliminary injunction requiring that Defendants and their agents, servants, employees, officers, directors, attorneys, successors, assigns, licensees and all others in active concert or participation with any of them, cease infringing, or causing, aiding, enabling, facilitating, encouraging, promoting, inducing or materially contributing to or participating in the infringement of any of Plaintiff's copyrights or exclusive rights protected by the Copyright Act or common law (whether now in existence or hereafter created), including without limitation the recordings listed in Exhibits A and B.

B. On Counts I-IV, for maximum statutory damages in the amount of \$150,000 with respect to each copyrighted work infringed, or for such other amount as may be proper pursuant to 17 U.S.C. § 504(c).

C. On Count V, for compensatory damages, an accounting for all gains, profits and advantages derived from Defendants' wrongful acts and punitive damages in amounts to be proven at trial.

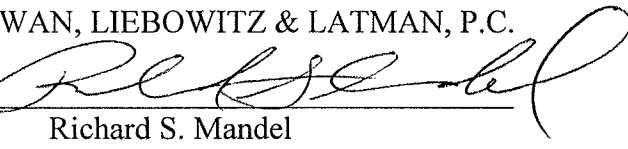
D. For Plaintiff's attorneys' fees, costs and disbursements in this action.

E. For prejudgment and post-judgment interest.

F. For such other and further relief as the Court may deem just and proper.

Dated: New York, New York  
August 30, 2013

COWAN, LIEBOWITZ & LATMAN, P.C.

By:   
Richard S. Mandel  
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New York, New York 10036-6799  
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Attorneys for Plaintiff  
Capitol Records, LLC

# EXHIBIT A

## FEDERAL

|    | Title                      | Artist             | SR #         |
|----|----------------------------|--------------------|--------------|
| 1  | This Is War                | 30 Seconds To Mars | SR0000636569 |
| 2  | The Kill (Bury Me)         | 30 Seconds To Mars | SR0000377457 |
| 3  | Kings And Queens           | 30 Seconds To Mars | SR0000636570 |
| 4  | Closer To The Edge         | 30 Seconds To Mars | SR0000636569 |
| 5  | Hurricane                  | 30 Seconds To Mars | SR0000636569 |
| 6  | Battle Of One              | 30 Seconds To Mars | SR0000377457 |
| 7  | Alibi                      | 30 Seconds To Mars | SR0000636569 |
| 8  | Escape                     | 30 Seconds To Mars | SR0000636569 |
| 9  | L490                       | 30 Seconds To Mars | SR0000636569 |
| 10 | Night of the Hunter        | 30 Seconds To Mars | SR0000636569 |
| 11 | Search and Destroy         | 30 Seconds To Mars | SR0000636569 |
| 12 | Stranger in a Strange Land | 30 Seconds To Mars | SR0000636569 |
| 13 | Vox Populi                 | 30 Seconds To Mars | SR0000636569 |
| 14 | The Outsider               | A Perfect Circle   | SR0000341312 |
| 15 | We Were Made For You       | Aaron Gillespie    | SR0000685691 |

|    | Title                                     | Artist  | SR #         |
|----|---|---------|--------------|
| 16 | Feel it In Your Heart                     | Abandon | SR0000685456 |
| 17 | Playground Love                           | Air     | SR0000295351 |
| 18 | Biological                                | Air     | SR0000656000 |
| 19 | Another Day                               | Air     | SR0000656000 |
| 20 | Mike Mills                                | Air     | SR0000656000 |
| 21 | Universal Traveler                        | Air     | SR0000656000 |
| 22 | Cherry Blossom Girl                       | Air     | SR0000656000 |
| 23 | Redhead Girl                              | Air     | SR0000630040 |
| 24 | Napalm Love                               | Air     | SR0000630040 |
| 25 | Mer Du Japon                              | Air     | SR0000630040 |
| 26 | Night Sight                               | Air     | SR0000630040 |
| 27 | Space Maker                               | Air     | SR0000630040 |
| 28 | Lost Message                              | Air     | SR0000630040 |
| 29 | Photograph                                | Air     | SR0000630040 |
| 30 | One Hell Of A Party (feat. Jarvis Cocker) | Air     | SR0000630040 |

|    | Title   | Artist          | SR #         |
|----|---|-----------------|--------------|
| 31 | Somewhere Between Waking And Sleeping (feat. N. Hannon) | Air             | SR0000630040 |
| 32 | Left Bank   | Air             | SR0000630040 |
| 33 | Mayfair Song  | Air             | SR0000630040 |
| 34 | Once Upon A Time  | Air             | SR0000630040 |
| 35 | Long Way To Go  | Alan Jackson    | SR0000702821 |
| 36 | Check My Brain  | Alice In Chains | SR0000643011 |
| 37 | Angels  | Amy Grant       | SR0000051829 |
| 38 | Who Let The Dogs Out                                    | Baha Men        | SR0000372953 |
| 39 | Daniel  | Bat For Lashes  | SR0000658971 |
| 40 | The Big Sleep   | Bat For Lashes  | SR0000658970 |
| 41 | Travelling Woman  | Bat For Lashes  | SR0000658970 |
| 42 | Good Love   | Bat For Lashes  | SR0000658970 |
| 43 | Siren Song  | Bat For Lashes  | SR0000658970 |
| 44 | Peace Of Mind   | Bat For Lashes  | SR0000658970 |
| 45 | Moon And Moon   | Bat For Lashes  | SR0000658970 |

## FEDERAL

|    | Title                 | Artist       | SR #         |
|----|-----------------------|--------------|--------------|
| 46 | Sabotage              | Beastie Boys | SR0000213461 |
| 47 | Intergalactic         | Beastie Boys | SR0000277731 |
| 48 | We Got The            | Beastie Boys | SR0000360352 |
| 49 | An Open Letter To NYC | Beastie Boys | SR0000360352 |
| 50 | Crawlspace            | Beastie Boys | SR0000360352 |
| 51 | All Lifestyles        | Beastie Boys | SR0000360352 |
| 52 | That's It That's All  | Beastie Boys | SR0000360352 |
| 53 | Hey F**k You          | Beastie Boys | SR0000360352 |
| 54 | Triple Trouble        | Beastie Boys | SR0000360352 |
| 55 | Rhyme The Rhyme Well  | Beastie Boys | SR0000360352 |
| 56 | Right Right Now Now   | Beastie Boys | SR0000360352 |
| 57 | Dr. Lee, PhD          | Beastie Boys | SR0000277731 |
| 58 | Instant Death         | Beastie Boys | SR0000277731 |
| 59 | Unite                 | Beastie Boys | SR0000277731 |
| 60 | Dedication            | Beastie Boys | SR0000277731 |

|    | Title                              | Artist       | SR #         |
|----|------------------------------------|--------------|--------------|
| 61 | Electrify                          | Beastie Boys | SR0000277731 |
| 62 | Song For Junior                    | Beastie Boys | SR0000277731 |
| 63 | Three MC's And One DJ              | Beastie Boys | SR0000277731 |
| 64 | The Grasshopper Unit (Keep Movin') | Beastie Boys | SR0000277731 |
| 65 | Picture This                       | Beastie Boys | SR0000277731 |
| 66 | Putting Shame In Your Game         | Beastie Boys | SR0000277731 |
| 67 | Flowin' Prose                      | Beastie Boys | SR0000277731 |
| 68 | Sneakin' Out the Hospital          | Beastie Boys | SR0000277731 |
| 69 | Body Movin'                        | Beastie Boys | SR0000277731 |
| 70 | Just A Test                        | Beastie Boys | SR0000277731 |
| 71 | Song For The Man                   | Beastie Boys | SR0000277731 |
| 72 | The Move                           | Beastie Boys | SR0000277731 |
| 73 | The Brouhaha                       | Beastie Boys | SR0000360352 |
| 74 | Shazam!                            | Beastie Boys | SR0000360352 |
| 75 | Oh Word?                           | Beastie Boys | SR0000360352 |



|    | Title                   | Artist                              | SR #         |
|----|-------------------------|-------------------------------------|--------------|
| 76 | 3 The Hard Way          | Beastie Boys                        | SR0000360352 |
| 77 | Ch-Check It Out         | Beastie Boys                        | SR0000360352 |
| 78 | So What'Cha Want        | Beastie Boys                        | SR0000197458 |
| 79 | Make Some Noise         | Beastie Boys                        | SR0000676386 |
| 80 | OK                      | Beastie Boys                        | SR0000676382 |
| 81 | Burn One Down           | Ben Harper                          | SR0000210135 |
| 82 | Steal My Kisses         | Ben Harper & The Innocent Criminals | SR0000273400 |
| 83 | In the Colors           | Ben Harper & The Innocent Criminals | SR0000621044 |
| 84 | White Wedding, Pt. 1    | Billy Idol                          | SR0000036550 |
| 85 | Girls & Boys            | Blur                                | SR0000345517 |
| 86 | Beautiful Loser         | Bob Seger                           | N22615       |
| 87 | Hollywood Nights (Live) | Bob Seger                           | SR0000031981 |
| 88 | Feel Like A Number      | Bob Seger                           | SR0000005635 |
| 89 | Mainstreet              | Bob Seger                           | N37718       |
| 90 | Against The Wind        | Bob Seger & The Silver Bullet Band  | SR0000017910 |

|     | Title                             | Artist       | SR #         |
|-----|-----------------------------------|--------------|--------------|
| 91  | Sort It Out                       | Caesars      | SR0000340478 |
| 92  | You're My Favourite               | Caesars      | SR0000340478 |
| 93  | You Don't Mean A Thing To Me      | Caesars      | SR0000340478 |
| 94  | Suzy Creamcheese                  | Caesars      | SR0000340478 |
| 95  | Since You've Been Gone            | Caesars      | SR0000338461 |
| 96  | Handclaps & Guitars               | Chiddy Bang  | SR0000695087 |
| 97  | What Kinda Gone                   | Chris Cagle  | SR0000640839 |
| 98  | Chicks Dig It                     | Chris Cagle  | SR0000330476 |
| 99  | All The Way My Savior Leads Me    | Chris Tomlin | SR0000638160 |
| 100 | Exalted (Yahweh)                  | Chris Tomlin | SR0000638160 |
| 101 | God Almighty                      | Chris Tomlin | SR0000638160 |
| 102 | Jesus Messiah                     | Chris Tomlin | SR0000638160 |
| 103 | My Deliverer                      | Chris Tomlin | SR0000638160 |
| 104 | Praise The Father, Praise The Son | Chris Tomlin | SR0000638160 |
| 105 | Sing, Sing, Sing                  | Chris Tomlin | SR0000638160 |

## FEDERAL

|     | Title                 | Artist       | SR #         |
|-----|-----------------------|--------------|--------------|
| 106 | With Me               | Chris Tomlin | SR0000638160 |
| 107 | You Lifted Me Out     | Chris Tomlin | SR0000638160 |
| 108 | Princess of China     | Coldplay     | SR0000686471 |
| 109 | We Never Change       | Coldplay     | SR0000328762 |
| 110 | Trouble               | Coldplay     | SR0000328762 |
| 111 | Everything's Not Lost | Coldplay     | SR0000328762 |
| 112 | Parachutes            | Coldplay     | SR0000328762 |
| 113 | Yellow                | Coldplay     | SR0000328762 |
| 114 | Sparks                | Coldplay     | SR0000328762 |
| 115 | Spies                 | Coldplay     | SR0000328762 |
| 116 | Shiver                | Coldplay     | SR0000328762 |
| 117 | Amsterdam             | Coldplay     | SR0000322958 |
| 118 | Clocks                | Coldplay     | SR0000322958 |
| 119 | The Scientist         | Coldplay     | SR0000322958 |
| 120 | Daylight              | Coldplay     | SR0000322958 |

## FEDERAL

|     | Title                          | Artist   | SR #         |
|-----|--------------------------------|----------|--------------|
| 121 | A Rush Of Blood To The Head    | Coldplay | SR0000322958 |
| 122 | A Whisper                      | Coldplay | SR0000322958 |
| 123 | Warning Signs                  | Coldplay | SR0000322958 |
| 124 | Green Eyes                     | Coldplay | SR0000322958 |
| 125 | God Put A Smile Upon Your Face | Coldplay | SR0000322958 |
| 126 | In My Place                    | Coldplay | SR0000322958 |
| 127 | Til Kingdom Come               | Coldplay | SR0000376828 |
| 128 | Twisted Logic                  | Coldplay | SR0000376828 |
| 129 | Swallowed In The Sea           | Coldplay | SR0000376828 |
| 130 | Low                            | Coldplay | SR0000376828 |
| 131 | A Message                      | Coldplay | SR0000376828 |
| 132 | Speed Of Sound                 | Coldplay | SR0000573811 |
| 133 | X & Y                          | Coldplay | SR0000376828 |
| 134 | Talk                           | Coldplay | SR0000376828 |
| 135 | Fix You                        | Coldplay | SR0000376828 |

## FEDERAL

|     | Title                           | Artist   | SR #         |
|-----|---------------------------------|----------|--------------|
| 136 | White Shadows                   | Coldplay | SR0000376828 |
| 137 | What If                         | Coldplay | SR0000376828 |
| 138 | Lovers In Japan / Reign Of Love | Coldplay | SR0000652909 |
| 139 | Viva La Vida                    | Coldplay | SR0000652909 |
| 140 | Lost!                           | Coldplay | SR0000652909 |
| 141 | Death And All His Friends       | Coldplay | SR0000652909 |
| 142 | Strawberry Swing                | Coldplay | SR0000652909 |
| 143 | Violet Hill                     | Coldplay | SR0000652911 |
| 144 | 42                              | Coldplay | SR0000652909 |
| 145 | Lost!                           | Coldplay | SR0000652909 |
| 146 | Cemeteries Of London            | Coldplay | SR0000652909 |
| 147 | Life In Technicolor             | Coldplay | SR0000652909 |
| 148 | A Hopeful Transmission          | Coldplay | SR0000686471 |
| 149 | Up With The Birds               | Coldplay | SR0000686471 |
| 150 | Don't Let It Break Your Heart   | Coldplay | SR0000686471 |

## FEDERAL

|     | Title                         | Artist   | SR #         |
|-----|-------------------------------|----------|--------------|
| 151 | Up In Flames                  | Coldplay | SR0000686471 |
| 152 | U.F.O.                        | Coldplay | SR0000686471 |
| 153 | Major Minus                   | Coldplay | SR0000680504 |
| 154 | Every Teardrop Is A Waterfall | Coldplay | SR0000675913 |
| 155 | M.M.I.X.                      | Coldplay | SR0000686471 |
| 156 | Us Against The World          | Coldplay | SR0000686471 |
| 157 | Charlie Brown                 | Coldplay | SR0000686471 |
| 158 | Paradise                      | Coldplay | SR0000686155 |
| 159 | Hurts Like Heaven             | Coldplay | SR0000686471 |
| 160 | Mylo Xyloto                   | Coldplay | SR0000686471 |
| 161 | Politik                       | Coldplay | SR0000322958 |
| 162 | Don't Panic                   | Coldplay | SR0000328762 |
| 163 | Yes                           | Coldplay | SR0000652909 |
| 164 | The Hardest Part              | Coldplay | SR0000376828 |
| 165 | Square One                    | Coldplay | SR0000376828 |

|     | Title  | Artist     | SR #         |
|-----|--|------------|--------------|
| 166 | Everything's Not Lost (includes hidden Track "Life Is For Living") | Coldplay   | SR0000328762 |
| 167 | Sunglasses At Night  | Corey Hart | SR0000055755 |
| 168 | High Life  | Daft Punk  | SR0000379190 |
| 169 | Aerodynamic  | Daft Punk  | SR0000379190 |
| 170 | Rollin' & Scratchin'   | Daft Punk  | SR0000220421 |
| 171 | Alive  | Daft Punk  | SR0000220421 |
| 172 | Revolution 909   | Daft Punk  | SR0000220421 |
| 173 | Crescendolls   | Daft Punk  | SR0000379190 |
| 174 | Harder, Better, Faster, Stronger                                   | Daft Punk  | SR0000379190 |
| 175 | NightVision  | Daft Punk  | SR0000379190 |
| 176 | One more Time  | Daft punk  | SR0000379190 |
| 177 | Something About Us   | Daft Punk  | SR0000379190 |
| 178 | Superheroes  | Daft Punk  | SR0000379190 |
| 179 | Veridis Quo  | Daft Punk  | SR0000379190 |
| 180 | Voyager  | Daft Punk  | SR0000379190 |

|     | Title                                  | Artist                       | SR #         |
|-----|--|------------------------------|--------------|
| 181 | Da Funk                                | Daft Punk                    | SR0000220421 |
| 182 | Funk Ad                                | Daft Punk                    | SR0000220421 |
| 183 | Oh Yeah                                | Daft Punk                    | SR0000220421 |
| 184 | On / Off                               | Daft Punk                    | SR0000372206 |
| 185 | Two Against One (feat. Jack White)     | Danger Mouse & Daniele Luppi | SR0000677728 |
| 186 | It Won't Be Like This For Long         | Darius Rucker                | SR0000651366 |
| 187 | Alright                                | Darius Rucker                | SR0000651366 |
| 188 | History In The Making                  | Darius Rucker                | SR0000651366 |
| 189 | Don't Think I Don't Think About It     | Darius Rucker                | SR0000651367 |
| 190 | Southern State Of Mind                 | Darius Rucker                | SR0000669902 |
| 191 | This                                   | Darius Rucker                | SR0000669902 |
| 192 | Come Back Song                         | Darius Rucker                | SR0000669904 |
| 193 | Ziggy Stardust (1999 Digital Remaster) | David Bowie                  | RE0000919238 |
| 194 | In The End (O Resplendent Light!)      | David Crowder Band           | SR0000646682 |
| 195 | God Almighty, None Compares            | David Crowder Band           | SR0000646682 |



|     | Title                                | Artist             | SR #         |
|-----|--------------------------------------|--------------------|--------------|
| 196 | Oh, Happiness                        | David Crowder Band | SR0000646682 |
| 197 | What A Miracle                       | David Crowder Band | SR0000646682 |
| 198 | Church Music Dance (!)               | David Crowder Band | SR0000646682 |
| 199 | Birmingham (We Are Safe)             | David Crowder Band | SR0000646682 |
| 200 | Can I Lie Here                       | David Crowder Band | SR0000646682 |
| 201 | How He Loves                         | David Crowder Band | SR0000646682 |
| 202 | All Around Me                        | David Crowder Band | SR0000646682 |
| 203 | We Are Loved                         | David Crowder Band | SR0000646682 |
| 204 | The Veil                             | David Crowder Band | SR0000646682 |
| 205 | SMS (Shine)                          | David Crowder Band | SR0000646682 |
| 206 | Eastern Hymn                         | David Crowder Band | SR0000646682 |
| 207 | Shadows                              | David Crowder Band | SR0000646682 |
| 208 | The Nearness                         | David Crowder Band | SR0000646682 |
| 209 | Alleluia, Sing                       | David Crowder Band | SR0000646682 |
| 210 | Phos Hilaron (Hail Gladdening Light) | David Crowder Band | SR0000646682 |

|     | Title  | Artist             | SR #         |
|-----|--|--------------------|--------------|
| 211 | Shadows (feat. Lecrae)                             | David Crowder Band | SR0000685686 |
| 212 | After All (Holy)                                   | David Crowder Band | SR0000700098 |
| 213 | Sexy Bitch (feat. Akon)                            | David Guetta       | SR0000649218 |
| 214 | Who's That Chick? (feat. Rihanna)                  | David Guetta       | SR0000677456 |
| 215 | Where Them Girls At (feat. Nicki Minaj & Flo Rida) | David Guetta       | SR0000683517 |
| 216 | Turn Me On (feat. Nicki Minaj)                     | David Guetta       | SR0000683523 |
| 217 | Without You (feat. Usher)                          | David Guetta       | SR0000683523 |
| 218 | When Love Takes Over (Electro Extended)            | David Guetta       | SR0000643600 |
| 219 | Mind's Eye   | DC Talk            | SR0000408458 |
| 220 | What Have We Become?                               | DC Talk            | SR0000408458 |
| 221 | In The Light                                       | DC Talk            | SR0000408458 |
| 222 | Jesus Freak (Reprise)                              | DC Talk            | SR0000408458 |
| 223 | Like It, Love It, Need It                          | DC Talk            | SR0000408458 |
| 224 | Between You And Me                                 | DC Talk            | SR0000408458 |
| 225 | Mrs. Morgan  | DC Talk            | SR0000408458 |

|     | Title                  | Artist          | SR #         |
|-----|------------------------|-----------------|--------------|
| 226 | Day By Day             | DC Talk         | SR0000408458 |
| 227 | What If I Stumble?     | DC Talk         | SR0000408458 |
| 228 | Jesus Freak            | DC Talk         | SR0000230848 |
| 229 | Colored People         | DC Talk         | SR0000408458 |
| 230 | So Help Me God         | DC Talk         | SR0000408458 |
| 231 | Strawberry Wine        | Deana Carter    | SR0000229757 |
| 232 | Deteriorate            | Demon Hunter    | SR0000391092 |
| 233 | Fire To My Soul        | Demon Hunter    | SR0000391092 |
| 234 | Not I                  | Demon Hunter    | SR0000391092 |
| 235 | One Thousand Apologies | Demon Hunter    | SR0000391092 |
| 236 | Relentless intolerance | Demon Hunter    | SR0000391092 |
| 237 | Rise Up                | Diane Birch     | SR0000671769 |
| 238 | Draw Me A Map          | Dierks Bentley  | SR0000663139 |
| 239 | Jesus                  | Dom             | SR0000676599 |
| 240 | Rollerblades           | Eliza Doolittle | SR0000677772 |

## FEDERAL

|     | Title                        | Artist             | SR #         |
|-----|------------------------------|--------------------|--------------|
| 241 | Standing On The Shore        | Empire Of The Sun  | SR0000658996 |
| 242 | Principles Of Lust           | Enigma             | SR0000126800 |
| 243 | The Cross Of Changes         | Enigma             | SR0000191945 |
| 244 | I Love You ... I'll Kill You | Enigma             | SR0000191945 |
| 245 | Gabriel's Oboe               | Ennio Morricone    | SR0000073541 |
| 246 | Hell On The Heart            | Eric Church        | SR0000656836 |
| 247 | Love Your Love The Most      | Eric Church        | SR0000656709 |
| 248 | Smoke A Little Smoke         | Eric Church        | SR0000656836 |
| 249 | Cliffs Of Dover              | Eric Johnson       | SR0000114785 |
| 250 | Father Of Mine               | Everclear          | SR0000181328 |
| 251 | Wonderful                    | Everclear          | SR0000284811 |
| 252 | Hollywood's Not America      | Ferras             | SR0000670874 |
| 253 | Stacy's Mom                  | Fountains Of Wayne | SR0000335616 |
| 254 | Slow Your Breath Down        | Future Of Forestry | SR0000637015 |
| 255 | Rosalita                     | Gomez              | SR0000273403 |

|     | Title   | Artist   | SR #         |
|-----|---|----------|--------------|
| 256 | Fill My Cup   | Gomez    | SR0000273403 |
| 257 | California  | Gomez    | SR0000273403 |
| 258 | Las Vegas Dealer  | Gomez    | SR0000273403 |
| 259 | Rhythm And Blues Alibi                                  | Gomez    | SR0000273403 |
| 260 | Bring It On   | Gomez    | SR0000273403 |
| 261 | Devil Will Ride   | Gomez    | SR0000273403 |
| 262 | Hangover  | Gomez    | SR0000273403 |
| 263 | We Haven't Turned Around                                | Gomez    | SR0000273403 |
| 264 | Feel Good Inc.  | Gorillaz | SRu000573812 |
| 265 | Rhinestone Eyes   | Gorillaz | SR0000650312 |
| 266 | Oh Melancholy Hill                                      | Gorillaz | SR0000650312 |
| 267 | Pirate Jet  | Gorillaz | SR0000650312 |
| 268 | To Binge (feat. Little Dragon)                          | Gorillaz | SR0000650312 |
| 269 | Cloud Of Unknowing (feat. Bobby Womack & sinfonia ViVa) | Gorillaz | SR0000650312 |
| 270 | Plastic Beach (feat. Mick Jones & Paul Simonon)         | Gorillaz | SR0000650312 |

|     | Title  | Artist        | SR #         |
|-----|--|---------------|--------------|
| 271 | Sweepstakes (feat. Mos Def & Hypnotic Brass Ensemble)                                  | Gorillaz      | SR0000650312 |
| 272 | Broken   | Gorillaz      | SR0000650312 |
| 273 | Some Kind Of Nature (feat. Lou Reed)   | Gorillaz      | SR0000650312 |
| 274 | Glitter Freeze (feat. Mark E Smith)  | Gorillaz      | SR0000650312 |
| 275 | Welcome to the World of the Plastic Beach (feat. Snoop Dogg & Hypnotic Brass Ensemble) | Gorillaz      | SR0000650312 |
| 276 | Superfast Jellyfish (feat. Gruff Rhys & De La Soul)                                    | Gorillaz      | SR0000650312 |
| 277 | Stylo (feat. Mos Def & Bobby Womack)   | Gorillaz      | SR0000650310 |
| 278 | Empire Ants (feat. Little Dragon)  | Gorillaz      | SR0000650312 |
| 279 | Orchestral Intro (feat. sinfonia ViVA)   | Gorillaz      | SR0000650312 |
| 280 | White Flag (feat. Bashy, Kano & The National Orchestra for Arabic Music)               | Gorillaz      | SR0000650312 |
| 281 | Friend Like That   | Hawk Nelson   | SR0000638086 |
| 282 | Never  | Heart         | SR0000075726 |
| 283 | What About love?   | Heart         | SR0000075726 |
| 284 | One Life Stand   | Hot Chip      | SR0000644551 |
| 285 | Centerfold   | J. Geils Band | SR0000033770 |

## FEDERAL

|     | Title                               | Artist        | SR #         |
|-----|-------------------------------------|---------------|--------------|
| 286 | Together Again                      | Janet Jackson | SR0000261516 |
| 287 | Tus Ojos No Me Ven                  | Joey Montana  | SR0000662249 |
| 288 | What I Need                         | Julie Reeves  | SR0000298736 |
| 289 | Hot N Cold                          | Katy Perry    | SR0000638214 |
| 290 | I Kissed A Girl                     | Katy Perry    | SR0000638212 |
| 291 | Waking Up In Vegas                  | Katy Perry    | SR0000638214 |
| 292 | Teenage Dream                       | Katy Perry    | SR0000662267 |
| 293 | California Gurls (feat. Snoop Dogg) | Katy Perry    | SR0000662264 |
| 294 | The One That Got Away               | Katy Perry    | SR0000662268 |
| 295 | Peacock                             | Katy Perry    | SR0000662268 |
| 296 | Firework                            | Katy Perry    | SR0000662268 |
| 297 | Last Friday Night (T.G.I.F)         | Katy Perry    | SR0000662268 |
| 298 | Who Am I Living For?                | Katy Perry    | SR0000662268 |
| 299 | E.T.                                | Katy Perry    | SR0000662268 |
| 300 | E.T. (feat. Kanye West)             | Katy Perry    | SR0000681293 |

|     | Title                   | Artist            | SR #         |
|-----|-------------------------|-------------------|--------------|
| 301 | Til Summer Comes Around | Keith Urban       | SR0000656739 |
| 302 | Your Everything         | Keith Urban       | SR0000273265 |
| 303 | Sweet Music Man         | Kenny Rogers      | N44114       |
| 304 | My Name Is Trouble      | Keren Ann         | SR0000670530 |
| 305 | Evolution               | Korn              | SR0000612042 |
| 306 | 4-2-0                   | Kottonmouth Kings | SR0000314748 |
| 307 | Tangerine Sky           | Kottonmouth Kings | SR0000314748 |
| 308 | King Klick              | Kottonmouth Kings | SR0000407934 |
| 309 | What Faith Can Do       | Kutless           | SR0000637035 |
| 310 | Strong Tower            | Kutless           | SR0000368826 |
| 311 | Get Outta My Way        | Kylie Minogue     | SR0000663118 |
| 312 | Everything Is Beautiful | Kylie Minogue     | SR0000663118 |
| 313 | Aphrodite               | Kylie Minogue     | SR0000663118 |
| 314 | All The Lovers          | Kylie Minogue     | SR0000663120 |
| 315 | Illusion                | Kylie Minogue     | SR0000663118 |



## FEDERAL

|     | Title                                | Artist          | SR #         |
|-----|--------------------------------------|-----------------|--------------|
| 316 | Better Than Today                    | Kylie Minogue   | SR0000663118 |
| 317 | Looking For An Angel                 | Kylie Minogue   | SR0000663118 |
| 318 | Put Your Hands Up (If You Feel Love) | Kylie Minogue   | SR0000663118 |
| 319 | Can't Beat The Feeling               | Kylie Minogue   | SR0000663118 |
| 320 | Cupid Boy                            | Kylie Minogue   | SR0000663118 |
| 321 | Closer                               | Kylie Minogue   | SR0000663118 |
| 322 | Too Much                             | Kylie Minogue   | SR0000663118 |
| 323 | Lookin' For A Good Time              | Lady Antebellum | SR0000656386 |
| 324 | Love Don't Live Here                 | Lady Antebellum | SR0000656388 |
| 325 | Need You Now                         | Lady Antebellum | SR0000644543 |
| 326 | We Owned The Night                   | Lady Antebellum | SR0000686144 |
| 327 | Ready To Love Again                  | Lady Antebellum | SR0000644547 |
| 328 | Stars Tonight                        | Lady Antebellum | SR0000644546 |
| 329 | Something 'Bout A Woman              | Lady Antebellum | SR0000644543 |
| 330 | If I Knew Then                       | Lady Antebellum | SR0000644543 |

## FEDERAL

|     | Title                          | Artist          | SR #         |
|-----|--------------------------------|-----------------|--------------|
| 331 | Love This Pain                 | Lady Antebellum | SR0000644542 |
| 332 | When You Got A Good Thing      | Lady Antebellum | SR0000644543 |
| 333 | American Honey                 | Lady Antebellum | SR0000644544 |
| 334 | Hello World                    | Lady Antebellum | SR0000644543 |
| 335 | Someone Great                  | LCD Soundsystem | SR0000404786 |
| 336 | Fly Away                       | Lenny Kravitz   | SR0000261538 |
| 337 | Where Are We Runnin'?          | Lenny Kravitz   | SR0000357913 |
| 338 | Happy                          | Liam Lynch      | SR0000361336 |
| 339 | Electrician's Day              | Liam Lynch      | SR0000361336 |
| 340 | United States Of Whatever      | Liam Lynch      | SR0000361336 |
| 341 | Shut Up Train                  | Little Big Town | SR0000662283 |
| 342 | Rain Is A Good Thing           | Luke Bryan      | SR0000643593 |
| 343 | Country Girl (Shake It For Me) | Luke Bryan      | SR0000681897 |
| 344 | Country Man                    | Luke Bryan      | SR0000612029 |
| 345 | We Rode In Trucks              | Luke Bryan      | SR0000612032 |

## FEDERAL

|     | Title                    | Artist                    | SR #         |
|-----|--------------------------|---------------------------|--------------|
| 346 | Pray                     | M.C. Hammer               | SR0000133683 |
| 347 | Impossible               | Manafest                  | SR0000399621 |
| 348 | My Deliverer             | Mandisa                   | SR0000636806 |
| 349 | Sex And Candy            | Marcy Playground          | SR0000240954 |
| 350 | Teardrop                 | Massive Attack            | SR0000261537 |
| 351 | Bitch                    | Meredith Brooks           | SR0000181390 |
| 352 | In a Sweater Poorly Knit | mewithoutYou              | SR0000399618 |
| 353 | Superman                 | MIMS                      | SR0000395566 |
| 354 | This Is Why I'm Hot      | Mims feat. Purple Popcorn | SR0000401208 |
| 355 | Tremble                  | Mindy McCready            | SR0000319470 |
| 356 | Breakfast                | Newsboys                  | SR0000221735 |
| 357 | He Reigns                | Newsboys                  | SR0000329866 |
| 358 | Fishin' Blues            | Nitty Gritty Dirt Band    | SR0000323470 |
| 359 | Here It Goes Again       | O.K. Go                   | SR0000377392 |
| 360 | We Belong                | Pat Benatar               | SR0000062244 |

|     | Title                            | Artist     | SR #         |
|-----|----------------------------------|------------|--------------|
| 361 | Money                            | Pink Floyd | N5354        |
| 362 | Another Brick In the Wall, Pt. 1 | Pink Floyd | SR0000014787 |
| 363 | Another Brick in the Wall, Pt. 2 | Pink Floyd | SR0000014787 |
| 364 | Another Brick In the Wall, Pt. 3 | Pink Floyd | SR0000014787 |
| 365 | Bring the Boys Back Home         | Pink Floyd | SR0000014787 |
| 366 | Comfortably Numb                 | Pink Floyd | SR0000014787 |
| 367 | A New Machine, Pt. 1             | Pink Floyd | SR0000087388 |
| 368 | A New Machine, Pt. 2             | Pink Floyd | SR0000087388 |
| 369 | Learning to Fly                  | Pink Floyd | SR0000087388 |
| 370 | On the Turning Away              | Pink Floyd | SR0000087388 |
| 371 | One Slip                         | Pink Floyd | SR0000087388 |
| 372 | Sings of Life                    | Pink Floyd | SR0000087388 |
| 373 | Sorrow                           | Pink Floyd | SR0000087388 |
| 374 | Terminal Frost                   | Pink Floyd | SR0000087388 |
| 375 | The Dogs of War                  | Pink Floyd | SR0000087388 |

|     | Title   | Artist            | SR #         |
|-----|---|-------------------|--------------|
| 376 | It's The End Of The World As We Know It (And I Feel Fine) | R.E.M.            | SR0000085269 |
| 377 | I'm Too Sexy  | Right Said Fred   | SR0000139833 |
| 378 | Gay Factory Worker  | Rodney Carrington | SR0000323514 |
| 379 | Listen To Your Heart                                      | Roxette           | SR0000107583 |
| 380 | Across The Graveyard                                      | Royksopp          | SR0000656821 |
| 381 | True To Life  | Royksopp          | SR0000656821 |
| 382 | Vision One  | Royksopp          | SR0000656821 |
| 383 | You Don't Have A Clue                                     | Royksopp          | SR0000656821 |
| 384 | It's What I Want  | Royksopp          | SR0000656821 |
| 385 | Happy Up Here   | Royksopp          | SR0000656742 |
| 386 | Royksopp Forever  | Royksopp          | SR0000656821 |
| 387 | This Must Be It   | Royksopp          | SR0000656821 |
| 388 | Silver Cruiser  | Royksopp          | SR0000656821 |
| 389 | The Girl And The Robot                                    | Royksopp          | SR0000656821 |
| 390 | Miss It So Much   | Royksopp          | SR0000656821 |

|     | Title                                  | Artist          | SR #         |
|-----|--|-----------------|--------------|
| 391 | Tricky Tricky                          | Royksopp        | SR0000656821 |
| 392 | Hey Alli                               | Runner Runner   | SR0000675362 |
| 393 | So Obvious                             | Runner Runner   | SR0000675361 |
| 394 | Lucky Now                              | Ryan Adams      | SR0000691450 |
| 395 | Dirty Rain                             | Ryan Adams      | SR0000691449 |
| 396 | Addicted                               | Saving Abel     | SR0000639178 |
| 397 | Somewhere In The Vicinity of the Heart | Shenandoah      | SR0000202180 |
| 398 | Two Dozen Roses                        | Shenandoah      | SR0000100702 |
| 399 | The Comeback                           | Shout Out Louds | SR0000372247 |
| 400 | Odd One                                | Sick Puppies    | SR0000629444 |
| 401 | You're Going Down                      | Sick Puppies    | SR0000629444 |
| 402 | The Last Day Of Our Acquaintance       | Sinead O'Connor | SR0000114910 |
| 403 | Tangled Up In Me                       | Skye Sweetnam   | SR0000365982 |
| 404 | Bullet (String Mix) [Bonus Track]      | Small Sins      | SR0000620546 |
| 405 | Bullet                                 | Small Sins      | SR0000620546 |

|     | Title                                    | Artist            | SR #         |
|-----|--|-------------------|--------------|
| 406 | I Need A Friend (Acoustic) [Bonus Track] | Small Sins        | SR0000620546 |
| 407 | Holiday                                  | Small Sins        | SR0000620546 |
| 408 | We Will Break Our Own Hearts             | Small Sins        | SR0000620546 |
| 409 | On A Mission                             | Small Sins        | SR0000620546 |
| 410 | It Keeps Me On My Toes                   | Small Sins        | SR0000620546 |
| 411 | On The Run                               | Small Sins        | SR0000620546 |
| 412 | Airport                                  | Small Sins        | SR0000620546 |
| 413 | Prove Me Wrong                           | Small Sins        | SR0000620546 |
| 414 | Drunk E-mails                            | Small Sins        | SR0000620546 |
| 415 | On The Line                              | Small Sins        | SR0000620546 |
| 416 | What Your Baby's Been Doing              | Small Sins        | SR0000620546 |
| 417 | I Need A Friend                          | Small Sins        | SR0000620546 |
| 418 | Morning Face                             | Small Sins        | SR0000620546 |
| 419 | Bullet With Butterfly Wings              | Smashing Pumpkins | SR0000183904 |
| 420 | Hummer                                   | Smashing Pumpkins | SR0000169635 |

|     | Title   | Artist                | SR #          |
|-----|---|-----------------------|---------------|
| 421 | Sweet Sweet                                       | Smashing Pumpkins     | SR0000169635  |
| 422 | Luna  | Smashing Pumpkins     | SR0000169635  |
| 423 | Geek U.S.A.                                       | Smashing Pumpkins     | SR0000169635  |
| 424 | Silverfuck  | Smashing Pumpkins     | SR0000169635  |
| 425 | Rocket  | Smashing Pumpkins     | SR0000169635  |
| 426 | The Lady Is A Vamp                                | Spice Girls           | SR0000261523  |
| 427 | If U Can't Dance                                  | Spice Girls           | SR0000201276  |
| 428 | Say You'll Be There                               | Spice Girls           | SR0000201276  |
| 429 | (There's Gotta Be) More to Life                   | Stacie Orrico         | SR0000329861  |
| 430 | Hosanna   | Starfield             | SR00000638147 |
| 431 | Fly Like An Eagle (Radio Edit)                    | Steve Miller Band     | N33473        |
| 432 | Diamond Hoo Ha Man                                | Supergrass            | SR00000638237 |
| 433 | Love Me Like You Used To                          | Tanya Tucker          | SR00000092952 |
| 434 | Amazing, Because It Is                            | The Almost            | SR00000699479 |
| 435 | The Salmon Dance (Heavily Smoked By The Glimmers) | The Chemical Brothers | SR00000612175 |



## FEDERAL

|     | Title                             | Artist                        | SR #         |
|-----|-----------------------------------|-------------------------------|--------------|
| 436 | The Rake's Song                   | The Decemberists              | SR0000656882 |
| 437 | Down By The Water                 | The Decemberists              | SR0000671436 |
| 438 | After The Bombs                   | The Decemberists              | SR0000656878 |
| 439 | Prelude                           | The Decemberists              | SR0000656878 |
| 440 | A Bower Scene                     | The Decemberists              | SR0000656878 |
| 441 | The Hazards Of Love 2 (Wager All) | The Decemberists              | SR0000656878 |
| 442 | Kingdom Of Doom                   | The Good, The Bad & The Queen | SR0000406995 |
| 443 | We're At The Top of the World     | The Juliana Theory            | SR0000295488 |
| 444 | Do You Love Me Still?             | The Kooks                     | SR0000613056 |
| 445 | Got No Love                       | The Kooks                     | SR0000613055 |
| 446 | Time Awaits                       | The Kooks                     | SR0000613055 |
| 447 | Jackie Big T**s                   | The Kooks                     | SR0000613055 |
| 448 | If Only                           | The Kooks                     | SR0000613055 |
| 449 | Naïve                             | The Kooks                     | SR0000613055 |
| 450 | I Want You                        | The Kooks                     | SR0000613055 |

|     | Title                       | Artist            | SR #         |
|-----|-----------------------------|-------------------|--------------|
| 451 | Matchbox                    | The Kooks         | SR0000613055 |
| 452 | She Loves In Her Own Way    | The Kooks         | SR0000613055 |
| 453 | You Don't Love Me           | The Kooks         | SR0000613055 |
| 454 | Ooh La                      | The Kooks         | SR0000613055 |
| 455 | Eddie's Gun                 | The Kooks         | SR0000613055 |
| 456 | See The World               | The Kooks         | SR0000613055 |
| 457 | Pictures Of You             | The Last Goodbye  | SR0000611249 |
| 458 | Night One (From Planchette) | The Panic Channel | SR0000399119 |
| 459 | Blue Bruises                | The Panic Channel | SR0000399119 |
| 460 | Bloody Mary                 | The Panic Channel | SR0000399119 |
| 461 | Left To Lose                | The Panic Channel | SR0000399119 |
| 462 | Teahouse Of The Spirits     | The Panic Channel | SR0000399118 |
| 463 | The Heat Is On              | The Power Station | SR0000061728 |
| 464 | Some Like It Hot            | The Power Station | SR0000061728 |
| 465 | I'm Gonna Be (500 Miles)    | The Proclaimers   | SR0000096996 |

|     | Title  | Artist                     | SR #         |
|-----|--|----------------------------|--------------|
| 466 | Face Down  | The Red Jumpsuit Apparatus | SR0000393452 |
| 467 | False Pretense   | The Red Jumpsuit Apparatus | SR0000394029 |
| 468 | Your Guardian Angel                                      | The Red Jumpsuit Apparatus | SR0000394029 |
| 469 | Wild Mountain Honey                                      | The Steve Miller Band      | N33473       |
| 470 | Beautifully Broken                                       | This Beautiful Republic    | SR0000637702 |
| 471 | Written In The Stars (feat. Eric Turner)                 | Tinie Tempah               | SR0000680992 |
| 472 | Wonderman (feat. Ellie Goulding)                         | Tinie Tempah               | SR0000680995 |
| 473 | Till I'm Gone (feat. Wiz Khalifa)                        | Tinie Tempah               | SR0000680998 |
| 474 | Face Of The Earth / Chuck @ Artist Development Interlude | tobyMac                    | SR0000406212 |
| 475 | Irene  | tobyMac                    | SR0000307522 |
| 476 | Wonderin' Why  | tobyMac                    | SR0000307522 |
| 477 | All In (Letting Go)/Mr. Talkbox Interlude                | tobyMac                    | SR0000406212 |
| 478 | Boomin' (feat. Shonlock)                                 | tobyMac                    | SR0000406212 |
| 479 | Boomin'/Opera Trip Interlude                             | tobyMac                    | SR0000406212 |
| 480 | Face Of The Earth / Chuck @ Artist Development Interlude | tobyMac                    | SR0000406212 |

|     | Title   | Artist               | SR #         |
|-----|---|----------------------|--------------|
| 481 | Feelin' So Fly  | tobyMac              | SR0000406212 |
| 482 | HypeMan (truDog '07)                                    | tobyMac              | SR0000406212 |
| 483 | Ignition  | tobyMac              | SR0000406212 |
| 484 | Ignition (Bonus Remix)                                  | tobyMac              | SR0000406212 |
| 485 | I'm for you   | tobyMac              | SR0000406212 |
| 486 | Lose My Soul/Afterparty (feat. Kirk Franklin & Mandisa) | tobyMac              | SR0000406212 |
| 487 | Made to Love  | tobyMac              | SR0000406212 |
| 488 | No Ordinary Love (feat. Nirva Dorsaint-Ready)           | tobyMac              | SR0000406212 |
| 489 | No Signal   | tobyMac              | SR0000406212 |
| 490 | One World (feat. Siti Monroe)                           | tobyMac              | SR0000406212 |
| 491 | Christmas This Year (feat. Leigh Nash)                  | tobyMac & Leigh Nash | SR0000715801 |
| 492 | All The King's Men                                      | Tom Cochrane         | SR0000338455 |
| 493 | Bigger Man  | Tom Cochrane         | SR0000338455 |
| 494 | Brave and Crazy   | Tom Cochrane         | SR0000338455 |
| 495 | Emotional Truth   | Tom Cochrane         | SR0000338455 |

## FEDERAL

|     | Title                              | Artist          | SR #         |
|-----|------------------------------------|-----------------|--------------|
| 496 | Everything Comes Around            | Tom Cochrane    | SR0000338455 |
| 497 | Friendly Advice                    | Tom Cochrane    | SR0000338455 |
| 498 | Get Back Up                        | Tom Cochrane    | SR0000338455 |
| 499 | Mad Mad Mad World                  | Tom Cochrane    | SR0000338455 |
| 500 | No Regrets                         | Tom Cochrane    | SR0000338455 |
| 501 | Sinking Like a Sunset              | Tom Cochrane    | SR0000338455 |
| 502 | The Secret is to Know When to Stop | Tom Cochrane    | SR0000338455 |
| 503 | Washed Away                        | Tom Cochrane    | SR0000338455 |
| 504 | Marry For Money                    | Trace Adkins    | SR0000649609 |
| 505 | Then They Do                       | Trace Adkins    | SR0000343104 |
| 506 | You're Gonna Miss This             | Trace Adkins    | SR0000614509 |
| 507 | Songs About Me                     | Trace Adkins    | SR0000361542 |
| 508 | Honky Tonk Badonkadonk             | Trace Adkins    | SR0000361541 |
| 509 | Your Woman                         | White Town      | SR0000231659 |
| 510 | School Boy                         | Wynton Marsalis | SR0000656724 |

## FEDERAL

|     | Title       | Artist     | SR #          |
|-----|-------------|------------|---------------|
| 511 | Dear Bobbie | Yellowcard | SR00000611607 |
| 512 | Nada        | Zoe        | SR00000656873 |

## EXHIBIT B

|    | Title                        | Artist      | SR #     |
|----|------------------------------|-------------|----------|
| 1  | Ramblin' Gamblin' Man (Live) | Bob Seger   | Pre-1972 |
| 2  | Andy Warhol                  | David Bowie | Pre-1972 |
| 3  | Eight Line Poem              | David Bowie | Pre-1972 |
| 4  | Fill Your Heart              | David Bowie | Pre-1972 |
| 5  | Kooks                        | David Bowie | Pre-1972 |
| 6  | Life on Mars?                | David Bowie | Pre-1972 |
| 7  | Oh! You Pretty Things        | David Bowie | Pre-1972 |
| 8  | Queen Bitch                  | David Bowie | Pre-1972 |
| 9  | Quicksand                    | David Bowie | Pre-1972 |
| 10 | Song for Bob Dylan           | David Bowie | Pre-1972 |
| 11 | The Bewlay Brothers          | David Bowie | Pre-1972 |



|    | Title  | Artist          | SR #     |
|----|--|-----------------|----------|
| 12 | On an Evening in Roma (Sott'er Celo de Roma) | Dean Martin     | Pre-1972 |
| 13 | In The Wee Small Hours Of The Morning        | Frank Sinatra   | Pre-1972 |
| 14 | I Get a Kick Out of You                      | Frank Sinatra   | Pre-1972 |
| 15 | I've Got the World On a String               | Frank Sinatra   | Pre-1972 |
| 16 | Angel Eyes                                   | Frank Sinatra   | Pre-1972 |
| 17 | My Sweet Lord                                | George Harrison | Pre-1972 |
| 18 | Crippled Inside                              | John Lennon     | Pre-1972 |
| 19 | Gimme Some Truth                             | John Lennon     | Pre-1972 |
| 20 | How Do You Sleep?                            | John Lennon     | Pre-1972 |
| 21 | How?   | John Lennon     | Pre-1972 |
| 22 | Imagine                                      | John Lennon     | Pre-1972 |

|    | Title                            | Artist            | SR #     |
|----|----------------------------------|-------------------|----------|
| 23 | It's So Hard                     | John Lennon       | Pre-1972 |
| 24 | Jealous Guy                      | John Lennon       | Pre-1972 |
| 25 | Oh My Love                       | John Lennon       | Pre-1972 |
| 26 | Oh Yoko!                         | John Lennon       | Pre-1972 |
| 27 | La vie en rose (English version) | Edith Piaf        | Pre-1972 |
| 28 | I Found Out                      | Plastic Ono Band  | Pre-1972 |
| 29 | God                              | Plastic Ono Band  | Pre-1972 |
| 30 | My Mummy's Dead                  | Plastic Ono Band  | Pre-1972 |
| 31 | Give Peace a Chance              | Plastic Ono Band  | Pre-1972 |
| 32 | Steppin' Stone                   | Steve Miller Band | Pre-1972 |
| 33 | I've Been There Too              | Ten Years After   | Pre-1972 |

|    | Title                                   | Artist          | SR #     |
|----|---|-----------------|----------|
| 34 | Uncle Jam                               | Ten Years After | Pre-1972 |
| 35 | Let The Sky Fall                        | Ten Years After | Pre-1972 |
| 36 | Hard Monkeys                            | Ten Years After | Pre-1972 |
| 37 | Once There Was A Time                   | Ten Years After | Pre-1972 |
| 38 | Baby Won't You Let Me Rock 'N' Roll You | Ten Years After | Pre-1972 |
| 39 | Over The Hill                           | Ten Years After | Pre-1972 |
| 40 | One Of These Days                       | Ten Years After | Pre-1972 |
| 41 | Here They Come                          | Ten Years After | Pre-1972 |
| 42 | I'd Love To Change The World            | Ten Years After | Pre-1972 |
| 43 | Key to the Highway (Outtake)            | The Band        | Pre-1972 |
| 44 | Tears of Rage (Alternate Take)          | The Band        | Pre-1972 |

|    | Title                          | Artist         | SR #     |
|----|--------------------------------|----------------|----------|
| 45 | Yazoo Street Scandal (Outtake) | The Band       | Pre-1972 |
| 46 | Surfin' USA                    | The Beach Boys | Pre-1972 |
| 47 | Catch a Wave                   | The Beach Boys | Pre-1972 |
| 48 | Girls on the Beach             | The Beach Boys | Pre-1972 |
| 49 | In My Room                     | The Beach Boys | Pre-1972 |
| 50 | Let Him Run Wild               | The Beach Boys | Pre-1972 |
| 51 | Shut Down                      | The Beach Boys | Pre-1972 |
| 52 | The Warmth of the Sun          | The Beach Boys | Pre-1972 |
| 53 | Wendy                          | The Beach Boys | Pre-1972 |
| 54 | Back In The U.S.S.R            | The Beatles    | Pre-1972 |
| 55 | Blackbird                      | The Beatles    | Pre-1972 |