

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CAPITOL RECORDS, LLC,

No. 12-cv-0095 (RJS) (AJP)

Plaintiff,

-against-

REDIGI INC.,

**DEFENDANT’S
INITIAL DISCLOSURES**

Defendant.

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PLEASE TAKE NOTICE THAT, pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure and Local Rule 26.3, defendant ReDigi Inc. (“ReDigi”) hereby makes the following initial disclosures:

1. The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment:

Name	Address	Telephone	Subject of Information
Larry Rudolph	c/o Ray Beckerman, P.C. 108-18 Queens Blvd., 4 th Fl. Forest Hills, NY 11375	(718) 544-3434	ReDigi software; ReDigi website; registration process; upload, download and storage processes; eligibility and verification of files; linking and streaming of 30-second clips; linking and display of artwork; locker storage; sale process, transfer of ownership.

John Ossenmacher	c/o Ray Beckerman, P.C. 108-18 Queens Blvd., 4 th Fl. Forest Hills, NY 11375	(718) 544-3434	Business model; marketing; terms of service; ReDigi software; ReDigi website; registration process; upload, download and storage processes; eligibility and verification of files; linking and streaming of 30-second clips; linking and display of artwork; locker storage; sale process, transfer of ownership; DMCA designated agent.
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2. A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

Category	Description	Original Location*
Software Code	Certain aspects and functions of the software code created and/or used by ReDigi that constitutes the ReDigi products and services identified in Plaintiff's complaint. ReDigi does not expect at this time that the Software Code itself in a complete and uncompiled (raw) format will be used or introduced in whole, or even substantially in whole, at trial. However, the compiled code and actual software products used by ReDigi customers may be used at trial and is included in this category. This latter portion is essentially available directly from the ReDigi website.	ReDigi Offices and/or on remote computer systems used by vendors who provide certain outsourced Information Technology related services to ReDigi.
ReDigi.com Website	All or portions of the ReDigi website, including those pages that describe, display or reflect the functionality of the ReDigi products and/or services, as well as any usage, privacy and other policies therein.	ReDigi Offices and/or on remote computer systems used by vendors who provide certain outsourced Information Technology related services to ReDigi.

Transactional Database	Excerpts from the database(s) and related systems, if any, that record individual transactions on the ReDigi products and services identified in Plaintiff's complaint.	ReDigi Offices and/or on remote computer systems used by vendors who provide certain outsourced Information Technology related services to ReDigi.
Electronic Mail	Electronic Mail sent and/or received by ReDigi employees or related individuals. ReDigi expects only extremely limited, if any, electronic mail will be used to support its claims or defenses.	ReDigi Offices and/or on remote computer systems used by vendors who provide certain outsourced Information Technology related services to ReDigi.
Other Electronically Stored Information	Any other common electronically stored information, such as word documents, excel documents, charts, workflows and other such documents that may support ReDigi's claims or defenses.	ReDigi Offices and/or on remote computer systems used by vendors who provide certain outsourced Information Technology related services to ReDigi.

* Certain categories and types of information have been, are in the process of, or will be collected and preserved by ReDigi's Electronic Discovery vendor, at which time forensically sound duplicates will also be maintained for further use in this litigation at said vendor's location(s).

3. A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered. NOT APPLICABLE.

4. For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment. NONE.

Dated: Forest Hills, New York
March 5, 2012

RAY BECKERMAN, P.C.

By: Morlan Ty Rogers

Morlan Ty Rogers
Attorneys for defendant ReDigi Inc.
108-18 Queens Blvd., 4th Floor
Forest Hills, NY 11375
(718) 544-3434

To: Cowan, Liebowitz & Latman, P.C.
Attorneys for plaintiff Capitol Records, LLC
1133 Avenue of the Americas
New York, NY 10036-6799
(212) 790-9200