

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

CRAIG REED, et al.,

Plaintiffs,

vs.

FREEBIRD FILM PRODUCTIONS, INC., et al.,

Defendants.

CASE NO. 1:08-CV-01761

JUDGE CHRISTOPHER A. BOYKO

**PLAINTIFFS' RESPONSES TO
DEFENDANTS RHI ENTERTAINMENT DISTRIBUTION, LLC'S AND LIONS GATE
FILMS, INC.'S FIRST REQUESTS FOR ADMISSIONS, REQUESTS FOR
PRODUCTION, AND INTERROGATORIES TO PLAINTIFFS CRAIG REED
AND SURVIVOR FILMS, INC.**

Plaintiffs Craig Reed and Survivor Films, Inc., by and through their undersigned counsel, and in accordance with Rules 26, 33, 34, and 36 of the Federal Rules of Civil Procedure and Rule 26.1 of the Local Rules of the United States District Court for the Northern District of Ohio, hereby provide the following responses and objections to RHI Entertainment Distribution, LLC's and Lions Gate Films, Inc.'s First Requests For Admissions, Requests For Production, And Interrogatories To Plaintiffs Craig Reed And Survivor Films, Inc.

REQUESTS FOR ADMISSIONS

Plaintiffs Craig Reed and Survivor Films, Inc., by and through their undersigned counsel, and in accordance with Rules 26 and 36 of the Federal Rules of Civil Procedure hereby provide the following objections and responses to the Requests for Admissions propounded by RHI Entertainment Distribution, LLC's and Lions Gate Films, Inc.

1. Admit that Hallmark did not infringe Plaintiffs' Copyrights in connection with the DVD entitled LYNRYD SKYNYRD – LYVE FROM STEEL TOWN.

Response: Denied.

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2. Admit that Artisan did not infringe Plaintiffs' Copyrights in connection with the DVD entitled LYNRYD SKYNYRD – LYVE FROM STEEL TOWN.

Response: Denied.

3. Admit that Hallmark did not infringe Plaintiffs' Copyrights in connection with the DVD entitled LYNRYD SKYNYRD LYVE – THE VICIOUS CYCLE TOUR.

Response: Denied.

4. Admit that Artisan did not infringe Plaintiffs' Copyrights in connection with the DVD entitled LYNRYD SKYNYRD LYVE – THE VICIOUS CYCLE TOUR.

Response: Denied.

5. Admit that Hallmark did not infringe Plaintiffs' Copyrights in connection with the DVD entitled 2003 NASHVILLE LIVE.

Response: Denied.

6. Admit that Artisan did not infringe Plaintiffs' Copyrights in connection with the DVD entitled 2003 NASHVILLE LIVE.

Response: Denied.

7. Admit that Hallmark did not infringe Plaintiffs' Copyrights in connection with the music video for the song SIMPLE MAN.

Response: Denied.

8. Admit that Artisan did not infringe Plaintiffs' Copyrights in connection with the music video for the song SIMPLE MAN.

Response: Denied.

9. Admit that Hallmark did not infringe Plaintiffs' Copyrights in connection with the music video for the song FREEBIRD.

Response: Denied.

10. Admit that Artisan did not infringe Plaintiffs' Copyrights in connection with the music video for the song FREEBIRD.

Response: Denied.

11. Admit that Hallmark did not infringe Plaintiffs' Copyrights in connection with the music video for the song SWEET HOME ALABAMA.

Response: Denied.

12. Admit that Artisan did not infringe Plaintiffs' Copyrights in connection with the music video for the song SWEET HOME ALABAMA.

Response: Denied.

13. Admit that Plaintiffs have no evidence that Hallmark was involved in the creation, duplication, distribution, marketing and/or sale of any of the video projects listed in paragraphs 59 – 66 of the Complaint.

Response: Objection. Plaintiffs presently lack knowledge or information sufficient to admit or deny the foregoing Request for Admission. Plaintiffs have made reasonable inquiry, via formal discovery requests and otherwise, into the subject matter of the foregoing Request for Admission but, despite this inquiry, the information Plaintiffs know and can reasonably obtain at this time is insufficient to enable Plaintiffs to admit or deny the Request for Admission.

14. Admit that Plaintiffs have no evidence that Artisan was involved in the creation, duplication, distribution, marketing and/or sale of any of the video projects listed in paragraphs 59 – 66 of the Complaint.

Response: Objection. Plaintiffs presently lack knowledge or information sufficient to admit or deny the foregoing Request for Admission. Plaintiffs have made reasonable inquiry, via formal discovery requests and otherwise, into the subject matter of the foregoing Request for Admission but, despite this inquiry, the information Plaintiffs know and can reasonably obtain at this time is insufficient to enable Plaintiffs to admit or deny the Request for Admission.

15. Admit that Plaintiffs have no evidence that Hallmark benefited financially from the creation, duplication, distribution, marketing and/or sale of any of the video projects listed in paragraphs 59 – 66 of the Complaint.

Response: Objection. Plaintiffs presently lack knowledge or information sufficient to admit or deny the foregoing Request for Admission. Plaintiffs have made reasonable inquiry, via formal discovery requests and otherwise, into the subject matter of the foregoing Request for Admission but, despite this inquiry, the information Plaintiffs know and can reasonably obtain at this time is insufficient to enable Plaintiffs to admit or deny the Request for Admission.

16. Admit that Plaintiffs have no evidence that Artisan benefited financially from the creation, duplication, distribution, and/or sale of any of the video projects listed in paragraphs 59 – 66 of the Complaint.

Response: Objection. Plaintiffs presently lack knowledge or information sufficient to admit or deny the foregoing Request for Admission. Plaintiffs have made reasonable inquiry, via formal discovery requests and otherwise, into the subject matter of the foregoing Request for Admission but, despite this inquiry, the information Plaintiffs know and can reasonably obtain at this time is insufficient to enable Plaintiffs to admit or deny the Request for Admission.

limit allowed by the Federal Rules of Civil Procedure and the Local Rules of this Court. Without waving the foregoing objections, Plaintiffs will produce documents upon which they relied in denying the above Requests for Admissions.

4. Identify each and every document responsive to one or more of the foregoing Requests for Production as to which you assert privilege, including without limitation the attorney-client privilege and work-product doctrine, and state in detail the factual and legal basis for your assertion of privilege.

ANSWER: Chronology of events created by Mr. Craig Reed for counsel in anticipation of litigation.

5. Identify each and every document responsive to one or more of the foregoing Requests for Production that is lost, destroyed, or otherwise beyond your custody or control, and identify any and all persons in whose custody or control such documents might be found.

ANSWER: Plaintiffs are not aware of any such documents.

6. State in detail the manner in which you allege that Hallmark is involved in the Alleged Infringements, and state the factual basis for your answer.

ANSWER: Plaintiffs do not currently have specific evidence that Defendant Hallmark is involved in the Alleged Infringements, as defined by these Defendants. Defendant Hallmark has distributed at least one Lynyrd Skynyrd product containing Plaintiffs' copyrighted material in the past, however. Via discovery in this action with which Defendants heretofore have failed to cooperate, Plaintiffs are attempting to confirm whether Defendant Hallmark has distributed other such products or otherwise infringed one or more of Plaintiffs' copyrights. Accordingly, the Plaintiffs reserve the right to supplement this interrogatory response if they later discover information suggesting that Defendant Hallmark produced, manufactured, distributed, or otherwise participated in the exploitation of the products referenced above within the definition of Alleged Infringements.

