

Dale M. Cendali (DC 2676)
O'MELVENY & MYERS LLP
Citigroup Center
153 East 53rd Street
New York, New York 10022
Telephone: (212) 326-2000
Facsimile: (212) 326-2061

Counsel for Plaintiffs Zomba Recording Corp., Arista Records, Inc., Atlantic Recording Corp., BMG Music, Capitol Records, Inc., Elektra Entertainment Group Inc., Fonovisa, Inc., Interscope Records, LaFace Records, London-Sire Records Inc., Loud Records LLC, Motown Record Company, L.P., Priority Records LLC, The RCA Records Label, a unit of BMG Music, Rhino Entertainment Co., Sony Discos Inc., Sony Music Entertainment Inc., UMG Recordings, Inc., Univision Music LLC, Virgin Records America, Inc., Warner Bros. Records Inc., and Warner Music Latina Inc. ("Record Company Plaintiffs")

Carey R. Ramos (CR 7880)
Theodore K. Cheng (TC 8414)
PAUL, WEISS, RIFKIND, WHARTON
& GARRISON
1285 Avenue of the Americas
New York, New York 10019-6064
Telephone: (212) 373-3000
Facsimile: (212) 757-3990

Counsel for Plaintiffs Jerry Leiber, individually and d/b/a Jerry Leiber Music; Mike Stoller, individually and d/b/a Mike Stoller Music; Famous Music Corp.; Ensign Music Corp.; and Bruin Music Co. on behalf of themselves and all others similarly situated ("Songwriter/Music Publisher Plaintiffs")

Thomas E. L. Dewey (TD 6243)
Stephen M. Kramarsky (SK 6666)
DEWEY PEGNO & KRAMARSKY, LLP
30 Broad Street
New York, New York 10004
Telephone: (212) 943-9000
Facsimile: (212) 943-4325

Counsel for Plaintiffs Atlantic Recording Corp., Elektra Entertainment Group Inc., London-Sire Records Inc., Rhino Entertainment Co., Warner Bros. Records Inc., and Warner Music Latina Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ZOMBA RECORDING CORP., ARISTA RECORDS, INC., ATLANTIC RECORDING CORP., BMG MUSIC, CAPITOL RECORDS, INC., ELEKTRA ENTERTAINMENT GROUP INC., FONOVisA, INC., INTERSCOPE RECORDS, LAFACE RECORDS, LONDON-SIRE RECORDS INC., LOUD RECORDS LLC, MOTOWN RECORD COMPANY, L.P., PRIORITY RECORDS LLC, THE RCA RECORDS LABEL, a unit of BMG Music, RHINO ENTERTAINMENT CO., SONY DISCOS INC., SONY MUSIC ENTERTAINMENT INC., UMG RECORDINGS, INC., UNIVISION MUSIC LLC, VIRGIN RECORDS AMERICA, INC., WARNER BROS. RECORDS INC., and WARNER MUSIC LATINA INC.; and JERRY LEIBER, individually and D/B/A JERRY LEIBER MUSIC, MIKE STOLLER, individually and D/B/A MIKE STOLLER MUSIC, FAMOUS MUSIC CORP., ENSIGN MUSIC CORP., and BRUIN MUSIC CO., on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

AUDIOGALAXY, INC. and MICHAEL S. MERHEJ,

Defendants.

Civil Action No.

**COMPLAINT FOR CONTRIBUTORY
AND VICARIOUS COPYRIGHT
INFRINGEMENT AND UNFAIR
COMPETITION AND
SONGWRITER/MUSIC PUBLISHER
PLAINTIFFS' CLASS ACTION
COMPLAINT FOR COPYRIGHT
INFRINGEMENT**

Plaintiffs, by and through their counsel, allege upon knowledge to themselves and upon information and belief as to all other matters, as follows:

NATURE OF ACTION

1. This is a civil action for contributory and vicarious copyright infringement and related state law claims on behalf of plaintiff Record Companies, and a class action by plaintiffs Jerry Leiber individually and d/b/a Jerry Leiber Music, Mike Stoller individually and d/b/a Mike Stoller Music, Famous Music Corporation, Ensign Music Corporation, Bruin Music Company, on behalf of all music publishers represented by The Harry Fox Agency, Inc. ("HFA") that own and/or control at least one copyrighted musical composition that has been made available without their permission ("the Class"), arising out of the willful conduct of Defendants Audiogalaxy, Inc. ("Audiogalaxy") and Michael S. Merhej ("Merhej"), an individual (collectively "Defendants").

2. Like the now-enjoined music file-copying system and service run by Napster, Defendants have built, maintain, and control an integrated computer system and service, known as Audiogalaxy and accessible through a website, www.audiogalaxy.com, that they knowingly, willfully and intentionally designed specifically to facilitate and encourage millions of individual anonymous users to copy and distribute infringing copies of copyrighted works by the millions, if not billions. With functions such as the ability to download entire sound recording albums, cover artwork, and software, as well as a peer-to-peer music file-copying function, Audiogalaxy's system and service is even more egregious than that of Napster, which currently is subject to a preliminary injunction as a result of its contributory and vicarious copyright infringement. *See A & M Records, Inc., et al v. Napster, Inc.*, 284 F.3d 1091

(9th Cir. 2002). Among the artists and songwriters whose works are being unlawfully distributed through the Audiogalaxy system and service are: the Beatles, the Backstreet Boys, Brandy, Tony Bennett, Boyz II Men, the Grateful Dead, Elton John, Shakira, Janet Jackson, Billy Joel, Madonna, Whitney Houston, Bonnie Raitt, Metallica, Bob Dylan, Toni Braxton, Pet Shop Boys, Wu-Tang Clan, Diana Ross, Ice Cube, Julio Iglesias, David Bowie, B.B. King, Counting Crows, R.E.M., Frank Sinatra, Plaintiffs Jerry Leiber and Mike Stoller, Henry Mancini, Johnny Mercer, Paula Cole, Lalo Schiffrin, and numerous others.

3. A visit to Audiogalaxy's website makes readily apparent that Defendants' system and service is simply Napster with the addition of consumer-friendly features that make the reproduction and distribution of copyrighted content easier than ever before. The works of all the most popular artists, including many songs yet to be released to the public, are organized by Audiogalaxy in a library of piracy and placed at the users' fingertips. Thus, while feigning concern for protecting copyrights and discussing with many of the plaintiffs ways to filter their creative content, Defendants continue to this very day to make available all of the content plaintiffs have previously identified as infringing. Indeed, Defendants' filtering process is no more effective at filtering music than a fishnet is at filtering water.

4. Defendants are well aware of the massive infringements occurring daily by and through the Audiogalaxy system and service. Defendants initially created their system in order to capitalize on the marketplace success that Napster achieved and to supplant Napster as the preferred forum for the unlawful copying and distribution of

copyrighted works. Defendants are regularly compared to Napster or hailed as the “next Napster” in press accounts.

5. Defendants have the ability to control which works are available on their system and service, including through the use of a variety of technologies. Defendants also acknowledge the ability to remove users and to exclude certain content. Instead of effectively employing such technologies or policies, however, Defendants have chosen to build a business on the massive infringement of copyrighted works.

6. Defendants deliberately enable this infringement by providing Audiogalaxy users with a fully integrated infrastructure and facilities – including a hub of central computer servers to which users connect; a continuously updated database and index of infringing sound recordings; information about the file size, popularity, and download speed of files containing those recordings; proprietary software (“the Satellite”) to facilitate the rapid and efficient identification, copying, and distribution of those recordings; continuous support and back office administration; and other tools and technology – all of which, by design, enable and encourage users of the Audiogalaxy system and service to make their individual, previously private, collections of sound recordings available for instantaneous distribution to and copying by countless other Audiogalaxy users without authorization of the copyright owners.

7. In exchange for providing the site, facilities, and services through which to infringe plaintiffs’ copyrighted works, Defendants – like Napster – seek to cultivate an extensive user base that will attract investment dollars, advertisers, and

business partners. Plaintiffs' copyrighted sound recordings and musical compositions serve as the product that attracts that user base.

8. Defendants have deliberately built a business on and seek to profit from the daily, massive copyright infringement of plaintiffs' works that Defendants enable and encourage through the operation of the Audiogalaxy system and service. With each passing day, Defendants facilitate the infringement of millions of sound recordings and musical compositions throughout the United States and around the world. Defendants' conduct is causing and threatens to continue to cause severe and irreparable harm to plaintiffs and the recording and music publishing industries generally. Among the most pernicious effects of Defendants' unlawful conduct is that they are teaching a generation of consumers that artists and copyright owners have no right to compensation for their work, and that sound recordings and musical compositions are and should be free to anyone who can find them on the Internet.

9. For the foregoing reasons, plaintiffs seek damages and a permanent injunction to prevent further infringement of plaintiffs' copyrighted works.

PARTIES

Recording Company Plaintiffs

10. Plaintiff Zomba Recording Corporation, is a corporation duly organized and existing under the laws of the State of New York, with its principal place of business in New York and in this District, and is duly qualified to transact business in New York.

11. Plaintiff Arista Records, Inc. is a corporation duly organized and existing under the laws of the State of Delaware, with its principal place of business in New York and in this District, and is duly qualified to transact business in New York.

12. Plaintiff Atlantic Recording Corporation is a corporation duly organized and existing under the laws of the State of Delaware, with its principal place of business in New York and in this District, and is duly qualified to transact business in New York.

13. Plaintiff BMG Music is a New York general partnership that has, in the past, also done business as BMG Entertainment, with its principal place of business in New York and in this District, and is duly qualified to transact business in New York.

14. Plaintiff Capitol Records, Inc. is a corporation duly organized and existing under the laws of the State of Delaware, and is duly qualified to transact business in New York.

15. Plaintiff Elektra Entertainment Group Inc. is a corporation duly organized and existing under the laws of the State of Delaware, with its principal place of business in New York and in this District, and is duly qualified to transact business in New York.

16. Plaintiff Fonovisa, Inc. is a corporation duly organized and existing under the laws of the State of California, with its principal place of business in California, and is duly qualified to transact business in New York.

17. Plaintiff Interscope Records is a California general partnership, with its principal place of business in California, and is duly qualified to transact business in New York.

18. Plaintiff LaFace Records is a joint venture between Arista Ventures, Inc., a Delaware corporation with its principal place of business in New York and in this District, and LaFace Records, Inc., a Georgia corporation, and is duly qualified to transact business New York.

19. Plaintiff London-Sire Records Inc. is a corporation duly organized and existing under the laws of the State of Delaware, with its principal place of business in New York and in this District, and is duly qualified to transact business in New York.

20. Plaintiff Loud Records LLC is an entity duly organized and existing under the laws of the State of Delaware, with its principal place of business in New York and in this District, and is duly qualified to transact business in New York.

21. Plaintiff Motown Record Company, L.P., is a California limited partnership with its principal place of business in New York and in this District, and is duly qualified to transact business in New York.

22. Plaintiff Priority Records LLC is an entity duly organized and existing under the laws of the State of California with its principal place of business in California, and is duly qualified to transact business in New York.

23. Plaintiff The RCA Records Label is a unit of BMG Music, a New York general partnership, with its principal place of business in New York and in this District, and is duly qualified to transact business in New York.

24. Plaintiff Rhino Entertainment Company is a corporation duly organized and existing under the laws of the State of Delaware, with its principal place of business in California, and is duly qualified to transact business in New York.

25. Plaintiff Sony Discos Inc. is a corporation duly organized and existing under the laws of the State of Florida, and is duly qualified to transact business in New York.

26. Plaintiff Sony Music Entertainment Inc. is a corporation duly organized and existing under the laws of the State of Delaware, with its principal place of business in New York and in this District, and is duly qualified to transact business in New York.

27. Plaintiff UMG Recordings, Inc. is a corporation duly organized and existing under the laws of the State of Delaware, and is duly qualified to transact business in New York.

28. Plaintiff Univision Music LLC is an entity duly organized and existing under the laws of the State of Delaware, with its principal place of business in California, and is duly qualified to transact business in New York.

29. Plaintiff Virgin Records America, Inc. is a corporation duly organized and existing under the laws of the State of California, and is duly qualified to transact business in New York.

30. Plaintiff Warner Bros. Records Inc. is a corporation duly organized and existing under the laws of the State of Delaware, with its principal place of business in California, and is duly qualified to transact business in New York.

31. Plaintiff Warner Music Latina Inc. is a corporation duly organized and existing under the laws of the State of Delaware, with its principal place of business in Florida, and is duly qualified to transact business in New York.

32. Plaintiffs Zomba Recording Corporation, Arista Records, Inc., Atlantic Recording Corporation, BMG Music, Capitol Records, Inc., Elektra Entertainment Group Inc., Fonovisa, Inc., Interscope Records, LaFace Records, London-Sire Records Inc., Loud Records LLC, Motown Record Company, L.P., Priority Records LLC, The RCA Records Label, Rhino Entertainment Co., Sony Discos Inc., Sony Music Entertainment Inc., UMG Recordings, Inc., Univision Music LLC, Virgin Records America, Inc., Warner Bros. Records Inc., and Warner Music Latina Inc. will be referred to collectively herein as the "Record Company Plaintiffs."

The Class of Music Publisher Plaintiffs

33. Plaintiffs Jerry Leiber individually and d/b/a Jerry Leiber Music and Mike Stoller individually and d/b/a Mike Stoller Music ("Leiber & Stoller") are citizens of California and are professional songwriters who are also engaged in the business of music publishing whereby they license the recording, reproduction, and

distribution of musical works for which they either own or control the copyrights. Leiber & Stoller are composers of such famous songs as "Stand By Me," "Kansas City," "Poison Ivy," "Fools Fall In Love," "Ruby Baby," "Along Came Jones," and "Spanish Harlem." Several of these songs were recently featured in the Broadway show "Smokey Joe's Café."

34. Plaintiff Famous Music Corporation ("Famous") is a Delaware corporation, with its principal place of business in California, and is actively engaged in the business of music publishing whereby it licenses the recording, reproduction, and distribution of musical works for which it either owns or controls the copyrights.

35. Plaintiff Ensign Music Corporation is a Delaware corporation, with its principal place of business in California, and is actively engaged in the business of music publishing whereby it licenses the recording, reproduction, and distribution of musical works for which it either owns or controls the copyrights.

36. Plaintiff Bruin Music Company is a Delaware corporation, with its principal place of business in California, and is actively engaged in the business of music publishing whereby it licenses the recording, reproduction, and distribution of musical works for which it either owns or controls the copyrights.

37. Plaintiffs Leiber & Stoller, Famous Music Corporation, Ensign Music Corporation, and Bruin Music Company will be referred to collectively herein as the "Songwriter/Music Publisher Plaintiffs."

Defendants

38. Defendant Audiogalaxy, Inc. is a Texas corporation with its principal place of business in Austin, Texas.

39. Defendant Michael S. Merhej is an individual residing in the State of Texas. Merhej owns, controls, and is the alter ego of Audiogalaxy, Inc. Merhej has benefited and continues to benefit financially from the Audiogalaxy system and service.

40. Each of the Defendants is and at all times was a party to the unlawful activities complained of herein, and/or acted in concert or combination with the other named Defendant and/or has aided and abetted such other Defendant and/or has acted as an agent for the other Defendant with respect to the actions and matters described in this Complaint.

41. At all times herein mentioned, each of the Defendants has engaged in a conspiracy, common enterprise, and common course of conduct with the other Defendant. The purpose of such conspiracy, common enterprise, and common course of conduct has been, among other things, to serve the Defendants' own economic benefit by intentionally, purposefully, and willfully contributing to and benefiting from the infringement of plaintiffs' copyrights, exclusive rights under copyright, and state statutory and common law throughout the United States and the world. Each of the Defendants knowingly and intentionally has committed acts in furtherance of the conspiracy, common enterprise, and common course of conduct, and each is liable for the acts and conduct of the others.

JURISDICTION AND VENUE

42. This is an action seeking damages and injunctive relief for copyright infringement under the Copyright Law of the United States, 17 U.S.C. § 101 *et seq.*, and for misappropriation and unfair competition under state law.

43. This Court has jurisdiction of this action under 28 U.S.C. §§ 1331 and 1338(a) and (b), and pursuant to the supplemental jurisdiction provisions of 28 U.S.C. § 1367.

44. This Court has personal jurisdiction over Defendants. Defendants solicit, transact, and conduct business in the State of New York and in this District; have committed tortious acts both within and outside New York causing injury in New York; and are regularly doing or soliciting business or engaging in a persistent course of conduct in this State and in this District. Defendants expect or reasonably should expect their conduct to have consequences in New York, and derive substantial revenue from interstate commerce. Among other things, Defendants have facilitated and encouraged the infringement of plaintiffs' copyrights in sound recordings and musical compositions in New York. In addition, Defendants operate an interactive system and service that encourages and allows New York residents to download illegal copies of plaintiffs' works. Defendants have caused harm to plaintiffs in New York, where many of the plaintiffs reside, and where potential purchasers of plaintiffs' works are thereby diverted from legitimate transactions. Plaintiffs' claims arise out of the conduct that gives rise to personal jurisdiction over Defendants.

45. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(b) and (c), and §1400(a).

FACTS COMMON TO ALL CLAIMS FOR RELIEF

Record Company Plaintiffs

46. The Record Company Plaintiffs are engaged in the business of producing and manufacturing sound recordings containing performances of musical compositions and distributing and selling those sound recordings in phonorecords (as defined in 17 U.S.C. § 101, and including, without limitation, compact discs) and over the Internet, and/or licensing those activities to others. The Record Company Plaintiffs are among the leading producers of musical and sound recordings in the United States.

47. The Record Company Plaintiffs have invested and continue to invest substantial sums of money, time, effort, and creative talent to discover and develop recording artists, and to create, manufacture, advertise, promote, sell, and license sound recordings embodying their performances. In order to create sound recordings, the Record Company Plaintiffs make payments to, among others, their recording artists, other musicians, producers, technicians, and other staff personnel, and various musicians' unions. The Record Company Plaintiffs and their recording artists are compensated for their creative efforts and monetary investments largely from the revenues attributable to the sale of phonorecords to the public and from license fees from the reproduction, distribution, digital performance, or other exploitation of sound recordings. Absent such compensation, profits and motivation would be diverted away from recording artists and the record companies that record, manufacture, promote, and distribute their works. The pool of resources available for finding and promoting new artists would shrink, and the

quality, integrity, and diversity of musical recordings would suffer. The ultimate result would be to diminish the public's access to a wide variety of high-quality musical recordings.

48. The Record Company Plaintiffs are the copyright owners or owners of exclusive rights under United States copyright with respect to certain copyrighted sound recordings embodied in their phonorecords, including but not limited to those listed on Exhibit A (the "Copyrighted Sound Recordings"). Each Record Company Plaintiff has applied for and/or received Certificates of Copyright Registration from the Register of Copyrights for its Copyrighted Sound Recordings. Each Record Company Plaintiff has the exclusive rights to, *inter alia*, "reproduce the [Copyrighted Sound Recordings] in copies or phonorecords" and to "distribute copies [of the Copyrighted Sound Recordings] in phonorecords . . . to the public." Defendants have made each of the sound recordings listed in Exhibit A, as well as other copyrighted sound recordings owned by plaintiffs, available for unlawful and unauthorized copying and distribution over the Internet.

49. Additionally, the Record Company Plaintiffs have entered into various agreements by which they obtained the sole, exclusive, and complete right to manufacture, distribute, and sell phonorecords embodying certain recorded musical performances of popular recording artists that were initially "fixed" (recorded) before February 15, 1972, and therefore are subject to protection under state statutory and common law, including but not limited to those identified in Exhibit B (the "Pre-1972 Sound Recordings"). Defendants have made each of the sound recordings listed in Exhibit B, as well as other legally protected pre-1972 sound recordings owned by the

Record Company Plaintiffs, available for unlawful and unauthorized copying and distribution over the Internet.

Songwriters and Music Publishers

50. The Songwriter/Music Publisher Plaintiffs are professional songwriters and music publishers. Songwriters earn their livelihood, in part, by licensing their exclusive rights to make and distribute sound recordings embodying their musical compositions in the form of CDs, cassette tapes, LPs, and digital downloads. Music publishers are the caretakers of the songwriters' musical compositions. Thus, for example, a record label or Internet music service that wants to distribute a recording of Leiber & Stoller's "Jailhouse Rock" on CD, cassette tape, or as a digital download, must first obtain a license from and pay royalties to Leiber & Stoller, the music publishers and copyright owners.

51. Like thousands of other music publishers, the Songwriter/Music Publisher Plaintiffs have agency relationships with The Harry Fox Agency, Inc. ("HFA"). HFA is an industry service organization representing over 27,000 music publisher-principals that collectively own or control more than 2.5 million copyrighted musical works. Established in 1927, HFA serves as agent on behalf of its publisher-principals in licensing copyrighted musical compositions for reproduction and distribution as physical phonorecords (CDs, cassette tapes, and phonograph records), and over the Internet as digital phonorecord deliveries. HFA is a wholly owned subsidiary of the National Music Publishers' Association, Inc. ("NMPA"). Founded in 1917, NMPA is the principal trade association of music publishers in the United States. By appointing HFA as their common licensing and collection agent, the Songwriter/Music Publisher Plaintiffs and

other Class members have confirmed their interest in generating royalties by licensing their copyrighted musical works.

52. Plaintiffs Leiber & Stoller composed or co-composed the following copyrighted musical compositions, and own and/or control the copyrights in the musical compositions "Jailhouse Rock," "Love Potion #9," "Yakety Yak," "Poison Ivy," "Stand By Me," "Along Came Jones," "Charlie Brown," "Fools Fall In Love," "Ruby Baby," "Smokey Joe's Café," "Treat Me Nice," and "Spanish Harlem."

53. Plaintiff Famous Music Corporation owns and/or controls the copyrights in the musical compositions "A Time For Us (Romeo and Juliet Love Theme)," written and composed by Larry Kusik, Eddie Snyder, and Nino Rota; "Moon River," written and composed by Henry Mancini and Johnny Mercer; "Speak Softly Love (a/k/a/ Theme from The Godfather)," by Larry Kusik and Nino Rota; "Up Where We Belong," by Jack Nitzsche, Buffy Sainte-Marie, and Will Jennings; "Wifey," by R.L. Hugger, Keir Gist and Eddie Berkeley; "Nobody's Supposed To Be Here," by Montell Jordan and Anthony "Shep" Crawford; "Rock The Party (Off The Hook)," by Noah Bernardo, Paul Sandoval, Mark Daniels and Marcos Curiel; "Lit Up," by Joshua Todd, Keith Nelson, Jonathan Brightman, and Devon Glenn; and "Get It On Tonight," by Montell Jordan, Joerg Evers, Juergen Korduletsch, Sergio Moore, Darren Benbow, Antoine Wilson and Brian Palmer.

54. Plaintiff Bruin Music Company owns and/or controls the copyright in the musical composition "Mission Impossible – Theme," written and composed by Lalo Schifrin.

55. Plaintiff Ensign Music Corporation owns and/or controls the copyright in the musical composition "I Hope You Dance," written and composed by Tia Sillers and Mark D. Sanders; "Call Me," by Giorgio Moroder and Deborah Harry; "Can I Get A...", by Irving Lorenzo, Rob Mays, Shawn Carter and Jeffrey Atkins; "I Don't Want To Wait," written and composed by Paula Cole; "One Sweet Day," by Michael McCary, Nathan Morris, Wanya Morris, Shawn Stockman, Mariah Carey and Walter Afanasieff; "The Boy Is Mine," by Fred Jerkins III, Rodney Jerkins, LaShawn Daniels, Japhe Tejada and Brandy Norwood; "Holla Holla," by Irving Lorenzo, Jeffrey Atkins and Taiwan Green.

56. Through the infringing Audiogalaxy system and service, Defendants are infringing the copyrights in the musical compositions of the Songwriter/Music Publisher Plaintiffs and the Class, including but not limited to, those identified in Exhibit C ("the Copyrighted Musical Compositions").

57. For the remainder of this Complaint, the Record Company Plaintiffs and the Songwriter/Music Publisher Plaintiffs will be referred to collectively as "plaintiffs," unless they are referred to separately.

The Internet and Music Piracy

58. The Internet is a vast collection of interconnected computers and computer networks. It allows hundreds of millions of people around the world to communicate freely and easily with each other, and to exchange ideas and information, including academic research, literary works, financial data, music, movies, graphics, and an unending and ever-changing array of other data.

59. The Internet offers tremendous opportunities for the music business as well as for everyone who loves music. Indeed, the Internet provides distinct advantages for music because, unlike tangible products, it is possible not only to market and sell music online, but also to deliver it to the consumer digitally and instantly over the Internet. Record companies, including plaintiffs, technology companies, and Internet companies alike are creating exciting businesses to permit the public to take advantage of the opportunities that these new technologies make possible.

60. Unfortunately, in addition to creating opportunities for new and creative models for legitimate businesses, the Internet also has afforded opportunities for the wide-scale piracy of sound recordings and musical compositions. The most notorious example to date has been Napster, which is now subject to a federal court preliminary injunction to cease its infringing conduct. Notwithstanding the obvious – and adjudicated – unlawfulness of much of the conduct on the Napster system and service, Defendants are deliberately striving to emulate and replace that system (while attempting to co-opt its massive user base) with the Audiogalaxy system's more advanced technology that they created and control.

61. Technology has been widely distributed that enables individuals to copy a song from a commercially released CD onto the hard drive of their computers (a process known as "ripping") and then to compress this digitized file so that it is small enough to be readily distributed over the Internet. Most Internet piracy of sound recordings is accomplished using a compression technology. The best-known type of compression technology is MP3, which stands for Motion Picture Expert Group 1, Audio Layer 3. MP3 is an algorithm that reduces the size of a digital music file so that it more

easily and quickly can be copied, transmitted, and downloaded over the Internet. Many MP3s do not incorporate any security embodied in the music file to limit further copying and distribution of the sound recording. Thus, once a sound recording has been converted into an unsecured compressed format, it can be copied further and distributed an unlimited number of times, without significant degradation in sound quality.

62. It is well known, and has been widely reported, that major record companies, songwriters, and music publishers have generally not authorized their sound recordings or musical compositions to be reproduced and distributed in unsecured compression formats such as MP3.

The Infringing Audiogalaxy System and Service

63. The Audiogalaxy system and service that Defendants have created and which they control is an extensive system that anonymously connects Internet users and encourages and enables them to pool their music files into a single database containing millions of such files to enable them easily to make unlawful copies of any and as many recordings as they choose. Defendants intentionally provide their users with anonymity so as to prevent the owners of the copyrights in those musical compositions and sound recordings from learning the identities of the infringing users.

64. Defendants also attempt to shield themselves and their users from potential copyright infringement claims by maintaining "Acceptable Use Limitations" in their User Agreement that speciously purport to forbid the posting and distribution of copyrighted material when, in fact, such posting is the *raison d'être* of the Audiogalaxy system and service. Defendants provide Audiogalaxy users with the infrastructure,

facilities, technological means, and ongoing support and services to accomplish these infringements. Defendants are collectively involved in and enable this process from beginning to end.

65. The Audiogalaxy system and service functions in a fashion very similar to Napster's. Using a standard Internet browser and Defendants' proprietary Satellite software, users connect their computers to Defendants' hub of computer servers by logging on to the website www.audiogalaxy.com. Once connected, Audiogalaxy users can perform a search for artists, songs, or albums of interest. The music files of users who have connected to the system and have made such files available for copying are uploaded via the Satellite onto an Audiogalaxy file index server. The Audiogalaxy server creates an index based on a collective directory of files available for transfer, either presently or at some time in the past.

66. The Audiogalaxy system and service does more than simply tell users what recordings are available and which users have them; it creates a connection to each responsive music file so that it can be downloaded to the user who has selected that music file for copying. All users need to do is select the file they want by clicking on the link in the index provided by Defendants, and the file automatically downloads – *i.e.*, is copied and saved – to their individual computer hard drives. Users desiring a recording do not have to do anything to contact the user offering the recording; the Audiogalaxy Satellite facilitates the entire transaction.

67. The Audiogalaxy system and service goes one step beyond the Napster system in that it organizes its file index library by aggregating all files related to

a particular artist or song into a single index. (See Exhibit D.) This index is maintained on Audiogalaxy's servers and is made available by Defendants to all users of the Audiogalaxy system. Defendants' staff monitor the file indexes to aggregate duplicate file names. Defendants further gather metadata from each file that help them to identify it and determine its size and download speed in order to create the single index. By arranging the files available on the system and service according to the embedded metadata, Defendants facilitate the illicit copying and distribution of copyrighted works.

68. Defendants use the metadata that are gathered from each file to create an index of artists who perform in similar musical genres. If a user searches for a song by, for example, a blues artist, this index will generate a "Recommendation List" of other blues artists whose work is similar to the requested artist or whom other users performing searches under the blues genre have frequently selected. By creating these Recommendation Lists and linking the works of different artists in this manner, Defendants further facilitate the easy identification, copying, and distribution of infringing files.

69. Defendants continuously monitor thousands of users to keep track of when they log on and off. As soon as a user logs on, that user's files are inventoried and added to the file index library. When a user logs off, his files do not disappear from the file index; rather, they remain queued on the index so that when the user logs on again, any of his files that were previously requested by other users can be transferred. Furthermore, if a user's attempt to download from another user is interrupted, the Satellite's Auto-Resume function will find an alternate user with the same song file and complete the download. This Auto-Resume function indicates that Defendants' client

software engages in some unique file identification and does not just organize files according to user-inputted, text-based filenames.

70. In addition to facilitating the unauthorized copying and distribution of plaintiffs' copyrighted works in MP3 format, the Audiogalaxy system and service also enables users to transfer music files via FTP, or File Transfer Protocol. The FTP file transfer mechanism is a less-frequently used alternative to copying files peer-to-peer but performs essentially the same function: allowing for the easy copying and distribution of files containing plaintiffs' copyrighted works.

71. Each time a sound recording is downloaded over the Audiogalaxy system and service, the Audiogalaxy user making the recording available engages in an unauthorized distribution of that recording, and the user who downloads it makes an unauthorized copy of it. That sound recording is then made available by the downloading user for further viral distribution throughout the Audiogalaxy system and service. At any given time, millions of files are available for download through the Audiogalaxy system. The overwhelming majority of sound recordings and musical compositions that Defendants make available on the Audiogalaxy system and service are being distributed and copied in violation of the copyright law and other laws.

Defendants' Knowledge of the Infringing Activity

72. The works made available on the Audiogalaxy system and service include many recently released recordings that are available for copying within days of their release to the public and some even before their official release dates. Among the recordings offered for illegal copying by Defendants' system and service are those of

some of the most popular recording artists on some of the most well known recording labels, performing some of the most recognizable songs of the twentieth century. It is well known that artists of this caliber have recording agreements that grant exclusive rights to recording companies such as plaintiffs, and that these agreements limit the manner in which their recordings can be copied and used. Defendants are consequently aware that the reproduction and distribution of these works through the Audiogalaxy system and service is an infringement of those rights.

73. Defendants have ample knowledge of the infringements occurring on the Audiogalaxy system and service. Indeed, Defendants created their system and promote it specifically to facilitate and capitalize on its infringing use. News articles refer to Audiogalaxy as “filling the void left by Napster” or as “taking Napster’s place,” and the site frequently appears in lists and reviews of “the best free music websites.” (See Exhibit E.)

74. Furthermore, Defendants receive additional knowledge of infringement on the system and service via the activities that occur on “bulletin boards” hosted and maintained on Audiogalaxy.com at www.audiogalaxy.com/bbs?>. Users can post messages to the boards to exchange information about a variety of topics. In addition to numerous references to the infringing conduct taking place on the Audiogalaxy system and service, the bulletin boards frequently discuss how users can circumvent the paltry filtering system Defendants have instituted in order to pretend to screen out copyrighted works. One such bulletin board dedicated to this topic is one of Audiogalaxy’s “top ten” most frequented bulletin boards (see Exhibit F).

75. Finally, Defendants have been given repeated, express notice of the infringing activity with which their system and service is replete since as early as February 2001. At or about this time, the Record Company Plaintiffs, through the Recording Industry Association of America ("RIAA"), contacted Defendants regarding the presence of specific infringing works on the Audiogalaxy system and demanded that Defendants take steps to remove infringing sound recordings belonging to its member record companies. Defendant Merhej claimed that Audiogalaxy intended to work with RIAA and stated that Audiogalaxy would be "receptive to any reasonable proposal that will meet the needs of RIAA's members." Defendants, however, refused to implement an effective filtering method and instead chose a text-based filtering method, which searches for key words, such as artist name or song title, that appear as entered by individual users when they upload files to the Audiogalaxy Satellite. Because this filtering method depends on user-generated file identification data, it is easily circumvented and has proven to be ineffective.

76. As a result of RIAA's demand, since early 2001 Defendants have engaged in a series of half-hearted, ineffectual attempts to screen infringing copies of works from the Audiogalaxy system. In an effort to assist and hasten the removal of infringing files, RIAA even provided Defendants with a CD-ROM containing over 985,600 artist names and track titles owned or controlled by its member companies. Nevertheless, Defendants refused to take meaningful action and instead have done nothing more than pay lip service to plaintiffs' concerns with such false promises as "[w]e firmly believe that we must remove content owned by your member companies and that is our goal."

Defendants' Ability to Control the Infringing Activity
on the Audiogalaxy System and Service

77. Defendants have the right, ability, and technological capability to filter and remove plaintiffs' copyrighted works from the Audiogalaxy system and service. Defendants clearly state in their User Agreement that they reserve the right to review and remove materials posted to the system. Moreover, Defendants are aware of how creative users mis-name infringing files to circumvent the text-based filter. Rather than implement an effective filter and comply with the law, they have chosen instead to keep the system and service stocked with infringing works and to continue extracting benefits from illegal copying and distribution. Indeed, the very sound recordings that RIAA advised Defendants in early 2001 were infringing works are still available on the Audiogalaxy system today. As the Ninth Circuit recently held when affirming the injunction in *A & M Records, Inc. v. Napster*, Defendants have a duty to cease their infringing activity and implement a truly effective filtering system once they have notice that infringing works are being made available for unauthorized copying and distribution.

Defendants' Financial Benefit From the Infringing Activity

78. Defendants benefit financially from the unauthorized copying and distribution of music occurring on the Audiogalaxy system and service in a number of ways. First, Defendants offer an enhanced version of their services called Satellite Gold. For a monthly fee, Satellite Gold users can download and use a version of the Satellite software that provides a faster connection to the system, thereby enhancing the speed at which users can illegally copy and distribute files. Second, Defendants receive fees and revenue by selling space on the Audiogalaxy website to advertisers, who place banner

and pop-up ads on the site. The amount of such fees and revenue is generally tied to the number of users who frequent the site; the more users who visit, the more Defendants can charge advertisers for space. Finally, Defendants receive revenue from the sale of CDs of artists featured on the site who have voluntarily made their work available on the system and service to promote themselves. All of the above financial benefit is derived directly or indirectly from the infringing activity that Defendants facilitate and support.

Harm to Plaintiffs' Market Caused By Defendants' Infringement

79. Unchecked Internet piracy of the type engaged in by Defendants poses grave risks to the sale of sound recordings fixed in CDs and tapes and to the sale of sound recordings on the Internet, as well as the development of a legitimate online market for music. The Record Company Plaintiffs suffer tremendous levels of lost sales of albums and singles. Additionally, Defendants' wholesale infringement harms the market for licensed recordings of Songwriter /Music Publisher Plaintiffs' and Class members' copyrighted musical compositions. That market is the bread and butter of songwriters and their music publishers. The market for plaintiffs' works is severely harmed when consumers are able to download for free over the Audiogalaxy system and service the same sound recordings and musical compositions that plaintiffs are offering to them for sale. Even more damaging is the lesson that systems such as Defendants' teach to consumers – namely, that artists do not deserve to be compensated for their creative endeavors, and that creative works are free for the taking by anyone with an Internet connection. Defendants' piratical behavior must cease immediately.

CLASS ACTION ALLEGATIONS

80. The Songwriter/Music Publisher Plaintiffs bring this action as a class action pursuant to Federal Rule of Civil Procedure 23(a), (b)(2) & (3) on behalf of the Class (as defined above).

81. The members of the Class are so numerous that joinder of all members is impracticable. HFA represents more than 27,000 music publishers that own or control more than 2.5 million copyrighted musical works. Hundreds of thousands of Class members' songs are being made available through Defendants' system and service at any given time.

82. The Songwriter/Music Publisher Plaintiffs' claims are typical of the claims of the Class because the copyrights owned or controlled by the Songwriter/Music Publisher Plaintiffs and other Class members are being infringed in the same way and are causing substantially the same injury and because Class members seek the same relief as the Songwriter/Music Publisher Plaintiffs seek here.

83. The Songwriter/Music Publisher Plaintiffs will adequately protect the interests of the Class. The Songwriter/Music Publisher Plaintiffs are prominent songwriters and music publishers with catalogs that include some of the most recognizable musical works recorded in the twentieth century. The Songwriter/Music Publisher Plaintiffs have retained counsel who are experienced and competent in class action copyright infringement litigation. The Songwriter/Music Publisher Plaintiffs have no interests that are in conflict with those of the Class.

84. A class action is superior to other available methods for the fair and efficient adjudication of this controversy.

85. Because of the uniformity of Defendants' practices, an award of injunctive relief would be applicable to every member of the Class.

86. Common questions of law and fact predominate over questions that affect only individual members. Questions of law and fact common to the Class, without limitation, include:

- (a) the manner in which Defendants' service makes copyrighted musical works available for unauthorized distribution and copying;
- (b) whether Defendants have knowledge that infringing activity is taking place on their service;
- (c) whether Defendants are capable of controlling the infringing activity on their service;
- (d) whether Defendants derive a financial benefit from the infringing activity taking place on their service; and
- (e) whether Defendants' conduct is willful.

87. The Songwriter/Music Publisher Plaintiffs intend to request that this Court direct to the members of the Class the best notice practicable under the circumstances, pursuant to Federal Rule of Civil Procedure 23(c)(2).

COUNT I

CONTRIBUTORY COPYRIGHT INFRINGEMENT

[By Record Company Plaintiffs and Songwriter/Music Publisher Plaintiffs,
Against All Defendants]

88. Plaintiffs incorporate herein by this reference each and every averment contained in paragraphs 1 through 87, inclusive.

89. As described above, Defendants provide the site and facilities for the tremendous amount of copyright infringement that takes place on and by virtue of the Audiogalaxy system and service every day. An infringement occurs each time one of the millions of Audiogalaxy users, without authorization of the copyright owner, uploads a music file to the Audiogalaxy system's centralized index, thus offering it for distribution, and each time an Audiogalaxy user downloads another user's music file from that person's computer into his or her own, resulting in an unauthorized copy. Each and every one of these infringements is encouraged, made possible, and facilitated by Defendants.

90. Through their conduct Defendants have engaged and continue to engage in the business of knowingly and systematically inducing, causing, and materially contributing to the above-described unauthorized reproduction and/or distribution of copies of the Copyrighted Sound Recordings, the Pre-1972 Sound Recordings, and the Copyrighted Musical Compositions (the "Copyrighted Works") and thus to the infringement of plaintiffs' and the Class members' copyrights and exclusive rights under copyright in the Copyrighted Works.

91. The infringement of each of the plaintiffs' and the Class members' rights in and to the Copyrighted Works constitutes a separate and distinct act of infringement.

92. The foregoing acts of infringement by Defendants have been willful, intentional, and purposeful, in disregard of and indifference to plaintiffs' rights.

93. Defendants' conduct, as averred herein, constitutes contributory infringement of plaintiffs' and the Class members' copyrights and exclusive rights under copyright in violation of Sections 106, 115, and 501 of the Copyright Act, 17 U.S.C. §§ 106, 115, and 501.

94. As a direct and proximate result of the contributory infringements by Defendants of plaintiffs' and the Class members' copyrights and exclusive rights under copyright, plaintiffs are entitled to damages and Defendants' profits pursuant to 17 U.S.C. § 504(b) for each separate infringement.

95. Alternatively, plaintiffs are entitled to the maximum statutory damages, pursuant to 17 U.S.C. § 504(c), in the amount of \$150,000 with respect to each work infringed, or such other amounts as may be proper under 17 U.S.C. § 504(c). Plaintiffs allege that such statutory damages shall exceed \$100,000,000.

96. Plaintiffs and the Class members further are entitled to their attorneys' fees and full costs pursuant to 17 U.S.C. § 505.

97. Defendants' conduct is causing and, unless enjoined and restrained by this Court, will continue to cause plaintiffs and the Class members great and

irreparable injury that cannot fully be compensated or measured in money. Plaintiffs and the Class members have no adequate remedy at law. Pursuant to 17 U.S.C. § 502, they are entitled to a permanent injunction prohibiting further contributory infringements of their copyrights by Defendants.

COUNT II

VICARIOUS COPYRIGHT INFRINGEMENT

[By Record Company Plaintiffs and Songwriter/Music Publisher Plaintiffs,
Against All Defendants]

98. Plaintiffs incorporate herein by this reference each and every averment contained in Paragraphs 1 through 97, inclusive.

99. At all times relevant herein, Defendants had the right and ability to police the Audiogalaxy system and service and to supervise and/or control the infringing conduct of Audiogalaxy's users by, without limitation, (i) preventing or terminating a user's access to the Audiogalaxy system's computer servers; (ii) by refusing to index and provide connections to infringing music files and to prevent copying and distribution of those music files; and (iii) otherwise implementing an effective filtering mechanism. Defendants have failed to so police any infringing activities and to exercise such supervision and/or control. As a direct and proximate result of such failure, Audiogalaxy users infringed plaintiffs' and the Class members' copyrights in the Copyrighted Works, as set forth above.

100. At all times relevant herein, Defendants derived substantial financial benefit from infringements of plaintiffs' and the Class members' copyrights by the users of the Audiogalaxy system and service. Virtually the entire value of the

Audiogalaxy system is derived from the infringement of plaintiffs' and the Class members' works in that the system's value grows as the quantity and quality of available music increases. Plaintiffs' and the Class members' works serve as the principal inducement for users to join the Audiogalaxy system and service. Defendants' ability to entice an ever-increasing number of users benefits Defendants by attracting potential advertisers, business partners, and investors, and generating revenue.

101. The foregoing acts of infringement by Defendants have been willful, intentional, and purposeful, in disregard of and indifference to plaintiffs' rights.

102. Defendants' conduct constitutes vicarious infringement of plaintiffs' copyrights and exclusive rights under copyright, in violation of Sections 106, 115, and 501 of the Copyright Act, 17 U.S.C. §§ 106, 115, and 501.

103. As a direct and proximate result of Defendants' vicarious infringement of plaintiffs' and the Class members' copyrights and exclusive rights under copyright, plaintiffs and the Class members are entitled to damages and Defendants' profits pursuant to 17 U.S.C. § 504(b) for each separate infringement.

104. Alternatively, plaintiffs are entitled to the maximum statutory damages in the amount of \$150,000 with respect to each work infringed, or for such other amounts as may be proper under 17 U.S.C. § 504(c). Plaintiffs allege that such statutory damages shall exceed \$100,000,000.

105. Plaintiffs further are entitled to their attorneys' fees and full costs pursuant to 17 U.S.C. § 505.

106. Defendants' conduct is causing and, unless enjoined and restrained by this Court, will continue to cause plaintiffs and the Class members great and irreparable injury that cannot fully be compensated or measured in money. Plaintiffs and the Class members have no adequate remedy at law. Pursuant to 17 U.S.C. § 502, they are entitled to a permanent injunction prohibiting further vicarious infringements of their copyrights by Defendants.

COUNT III

STATUTORY AND COMMON LAW UNFAIR COMPETITION

[By Record Company Plaintiffs, Against All Defendants]

107. Record Company Plaintiffs incorporate herein by this reference each and every averment contained in paragraphs 1 through 106, inclusive.

108. The foregoing acts and conduct of Defendants constitute an appropriation and invasion of the property rights of Record Company Plaintiffs in and to the Pre-1972 Sound Recordings, and constitute misappropriation and unfair competition under state statutory and common law.

109. As a direct and proximate result of Defendants' conduct, Record Company Plaintiffs are further entitled to recover all proceeds and other compensation received or to be received by Defendants arising from infringements by users of the Audiogalaxy system and service of the Pre-1972 Sound Recordings. Record Company Plaintiffs request the Court to order the Defendants to render an accounting to ascertain the amount of such profits and compensation.

110. As a direct and proximate result of Defendants' misappropriation and unfair competition, Record Company Plaintiffs have been damaged, and Defendants have been unjustly enriched, in an amount that shall be proved at trial for which damages and/or restitution and disgorgement is appropriate. Such damages and/or restitution and disgorgement should include a declaration by this Court that each Defendant is a constructive trustee for the benefit of Record Company Plaintiffs, and an order that each Defendant convey to them all the gross receipts received or to be received that are attributable to infringement of the Pre-1972 Sound Recordings.

111. Through their conduct averred herein, Defendants are guilty of oppression, fraud, and/or malice and Record Company Plaintiffs are, in addition to their actual damages, by reason thereof, entitled to recover exemplary and punitive damages against Defendants.

112. Defendants' conduct is causing and, unless enjoined and restrained by this Court, will continue to cause Record Company Plaintiffs great and irreparable injury that cannot be fully compensated or measured in money. Record Company Plaintiffs have no adequate remedy at law. They are entitled to a permanent injunction prohibiting further acts of misappropriation and unfair competition by Defendants.

WHEREFORE, the Record Company Plaintiffs, the Songwriter/Music Publisher Plaintiffs, and other Class members pray for judgment against Defendants as follows:

1. On Counts I and II, for damages in such amount as may be found or established at trial; alternatively, for statutory damages in the amount of not less than

\$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) and damages in such amount as may be established at trial.

2. On Count III, for damages in such amount as may be found or established at trial;

3. On Counts I through III, for a permanent injunction enjoining Defendants and their respective agents, servants, employees, officers, attorneys, successors, licensees, and assigns, and all persons acting in concert or participation with each or any of them, from: (i) directly or indirectly infringing in any manner any of plaintiffs' copyrights (whether now in existence or hereafter created) in, including without limitation, the Copyrighted Sound Recordings listed in Exhibit A; the exclusive rights in the Pre-1972 Sound Recordings listed in Exhibit B; and the Copyrighted Musical Compositions listed in Exhibit C; and (ii) from causing, contributing to, enabling, facilitating, or participating in the infringement of any of plaintiffs' and the Class members' respective copyrights, including, without limitation, the Copyrighted Sound Recordings listed in Exhibit A; the exclusive rights in the Pre-1972 Sound Recordings listed in Exhibit B; and the Copyrighted Musical Compositions listed in Exhibit C.

4. On Count III, for an accounting, the imposition of a constructive trust, and damages according to proof.

5. On Count III, for punitive and exemplary damages in such amount as may be awarded at trial.

6. For prejudgment interest according to law.

7. For plaintiffs' attorneys' fees, costs, and disbursements in this action.

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

[CONTINUED ON FOLLOWING PAGE]

Dated: May 24, 2002

Respectfully submitted,

O'MELVENY & MYERS LLP

By: 

Dale M. Cendali, Esq. (DC 2676)

Citigroup Center

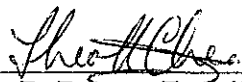
153 East 53rd Street

New York, New York 10022

(212) 326-2000

Counsel for Record Company Plaintiffs

PAUL, WEISS, RIFKIND, WHARTON
& GARRISON

By: 
Carey R. Ramos, Esq. (CR 7880)
Theodore K. Cheng, Esq. (TC 8414)
1285 Avenue of the Americas
New York, New York 10019-6064
(212) 373-3000

*Counsel for Plaintiffs Jerry Leiber, individually
and d/b/a Jerry Leiber Music; Mike Stoller,
individually and d/b/a Mike Stoller Music;
Famous Music Corp.; Ensign Music Corp.; and
Bruin Music Co. on behalf of themselves and all
others similarly situated*

DEWEY PEGNO & KRAMARSKY LLP

By: Thomas E. L. Dewey / SIL

Thomas E. L. Dewey, Esq. (TD 6243)

Stephen M. Kramarsky, Esq. (SK 6666)

30 Broad Street

New York, New York 10004

Telephone: (212) 943-9000

*Counsel for Plaintiffs Atlantic Recording Corp.,
Elektra Entertainment Group Inc., London-Sire
Records Inc., Rhino Entertainment Co., Warner
Bros. Records Inc. and Warner Music Latina Inc.*

Matthew J. Oppenheim, Esq.

Dean C. Garfield, Esq.

RECORDING INDUSTRY ASS'N
OF AMERICA, INC.

1330 Connecticut Avenue, NW

Suite 300

Washington, DC 20036

Telephone: (202) 775-0101

Diana M. Torres, Esq.

O'MELVENY & MYERS LLP

400 South Hope Street, 15th Floor

Los Angeles, California 90071

Telephone: (213) 430-6000

Robert M. Schwartz, Esq.

O'MELVENY & MYERS LLP

1999 Avenue of the Stars, 7th Floor

Los Angeles, California 90067

Telephone: (310) 246-6800

AND

Russell J. Frackman, Esq.

Steven B. Fabrizio, Esq.

MITCHELL SILBERBERG &
KNUPP LLP

11377 West Olympic Boulevard

Los Angeles, California 90064

Telephone: (310) 312-2000

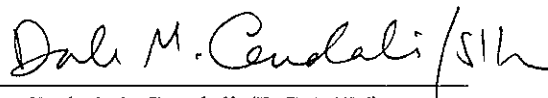
Of Counsel, Record Company Plaintiffs

CERTIFICATE OF SERVICE

I, Dale M. Cendali, hereby certify that on May 24, 2002, I caused a true and correct copy of this COMPLAINT FOR CONTRIBUTORY AND VICARIOUS COPYRIGHT INFRINGEMENT AND UNFAIR COMPETITION AND SONGWRITER/MUSIC PUBLISHER PLAINTIFFS' CLASS ACTION COMPLAINT FOR COPYRIGHT INFRINGEMENT to be served upon the following by causing said documents to be sent via overnight courier:

Audiogalaxy, Inc.
1135 West Sixth Street, Suite 120
Austin, Texas 78703-5309
Defendant

Mr. Michael S. Merhej
1135 West Sixth Street, Suite 120
Austin, Texas 78703-5309
Defendant

Handwritten signature of Dale M. Cendali in cursive script, followed by a horizontal line.

Dale M. Cendali (DC 2676)

Tracking

ARTIST NAME	SONG TITLE	COPYRIGHT PLAINTIFF	SR Numbers
Adema	Freaking Out	Arista Records, Inc.	302-233
Air Supply	All Out Of Love	Arista Records, Inc.	38-070
Air Supply	Just Another Woman	Arista Records, Inc.	38-070
Blue Cantrell	Hit'em Up Style (OOPS!)	Arista Records, Inc.	300-390
Dido	Here With Me	Arista Records, Inc.	289-904
Dido	Thank You	Arista Records, Inc.	289-904
Santana	Maria Maria	Arista Records, Inc.	289-833
Santana	Smooth	Arista Records, Inc.	289-833
Bad Company	Abandoned And Alone	Atlantic Recording Corporation	221-991
Bad Company	Clearwater Highway	Atlantic Recording Corporation	221-991
Bad Company	Dance With The Devil	Atlantic Recording Corporation	221-991
Bad Company	Fame and fortune	Atlantic Recording Corporation	72-318
Bad Company	Gimme Gimme	Atlantic Recording Corporation	221-991
Bad Company	I Can't Live Without You	Atlantic Recording Corporation	122-739
Bad Company	Little Martha	Atlantic Recording Corporation	221-991
Bad Company	Loving you out loud	Atlantic Recording Corporation	221-991
Das Efx	40 & A Blunt	Atlantic Recording Corporation	226-052
Das Efx	Bad News - Featuring PMD	Atlantic Recording Corporation	226-052
Das Efx	Real Hip-Hop - Pete Rock Remix	Atlantic Recording Corporation	226-052
Das Efx	They Want EFX	Atlantic Recording Corporation	140-245
En Vogue	My Lovin' (You're Never Gonna Get It)	Atlantic Recording Corporation	140-315
Kix	Loco - Emotion	Atlantic Recording Corporation	43-564
Kix	Pants On Fire (Liar, Liar)	Atlantic Recording Corporation	134-779
MC Lyte	Ruffneck	Atlantic Recording Corporation	168-042
MC Lyte	Shut The Eff Up! (Hoe)	Atlantic Recording Corporation	113-353
95 South	Down Low	BMG Music	287-007
95 South	Dr. Boom	BMG Music	287-007
Christina Aguilera	Come on Over	BMG Music	274-004
Christina Aguilera	I Turn to You	BMG Music	274-004
Eve 6	Inside Out	BMG Music	257-983
Lit	A Place in the Sun	BMG Music	264-272
Lit	Down	BMG Music	264-272
Lit	Four	BMG Music	264-272
Lit	Happy	BMG Music	264-272
Lit	Miserable	BMG Music	264-272

Tracking

Lit	No big Thing	BMG Music	264-272
Tyrese	I Like Them Girls	BMG Music	293-345
Tyrese	I wrote a song about it (Interlude)	BMG Music	293-345
Tyrese	Lately	BMG Music	237-788
Tyrese	Lord you Control Me (Interlude)	BMG Music	293-345
Tyrese	There for Me (Baby)	BMG Music	293-345
Tyrese	You get Yours	BMG Music	237-788
Vertical Horizon	All of You	BMG Music	277-868
Vertical Horizon	Best I ever Had	BMG Music	277-868
Vertical Horizon	Everything You Want	BMG Music	277-868
Vertical Horizon	Finding Me	BMG Music	277-868
Vertical Horizon	Give You Back	BMG Music	277-868
Vertical Horizon	Miracle	BMG Music	277-868
Vertical Horizon	Send it Up	BMG Music	277-868
Vertical Horizon	Shackled	BMG Music	277-868
Vertical Horizon	We Are	BMG Music	277-868
Vertical Horizon	You Say	BMG Music	277-868
Vertical Horizon	You're a God	BMG Music	277-868
Aaron Tippin	If I Had It To Do Over	BMG Music d/b/a The RCA Records Label	140-378
Aaron Tippin	Read Between The Lines	BMG Music d/b/a The RCA Records Label	140-378
Diana Ross	Endless Love	BMG Music d/b/a The RCA Records Label	32-131
Diana Ross	Why Do Fools Fall in Love	BMG Music d/b/a The RCA Records Label	32-131
Elvis Presley	Can't Help Falling In Love	BMG Music d/b/a The RCA Records Label	32-383
Elvis Presley	Love Me Tender	BMG Music d/b/a The RCA Records Label	32-383
Eurythmics	I Could Give You A Mirror	BMG Music d/b/a The RCA Records Label	46-186
Eurythmics	Missionary Man	BMG Music d/b/a The RCA Records Label	46-186
Eurythmics	Sweet Dreams	BMG Music d/b/a The RCA Records Label	46-186
The Calling	Could it be any Harder	BMG Music d/b/a The RCA Records Label	pending
The Calling	Just That Good	BMG Music d/b/a The RCA Records Label	pending
The Calling	Nothing's Changed	BMG Music d/b/a The RCA Records Label	pending
The Calling	Stigmatized	BMG Music d/b/a The RCA Records Label	pending
The Calling	We're Forgven	BMG Music d/b/a The RCA Records Label	pending
The Calling	Wherever you will go	BMG Music d/b/a The RCA Records Label	pending
Al Green	Lean on me	Capitol Records, Inc.	59-847
Arrested Development	In The Sunshine	Capitol Records, Inc.	190-978
Arrested Development	People Everyday	Capitol Records, Inc.	143-502

Tracking

Beastie Boys	Flowin' Prose	Capitol Records, Inc.	277-731
Beastie Boys	So What'Cha Want	Capitol Records, Inc.	197-458
Blondie	11:59	Capitol Records, Inc.	4-090
Blondie	Die Young, stay pretty	Capitol Records, Inc.	12-739
Blondie	Hanging on the telephone	Capitol Records, Inc.	4-090
Blondie	Heart of Glass	Capitol Records, Inc.	4-090
Blondie	I'm Gonna Love You Too	Capitol Records, Inc.	4-090
Blondie	One Way or Another	Capitol Records, Inc.	4-090
Blondie	The Hardest Part	Capitol Records, Inc.	12-739
Bobby McFerrin	Don't worry be happy	Capitol Records, Inc.	97-575
Bobby McFerrin	Freedom is a voice	Capitol Records, Inc.	214-196
Bobby McFerrin	Friends	Capitol Records, Inc.	214-196
Bobby McFerrin	Heaven's Design	Capitol Records, Inc.	214-196
Bobby McFerrin	Soma so de la de sase	Capitol Records, Inc.	127-477
Cassandra Wilson	Never broken	Capitol Records, Inc.	268-443
Cassandra Wilson	Resurrection blues	Capitol Records, Inc.	268-443
Cassandra Wilson	Sky And Sea (Blue In Green)	Capitol Records, Inc.	268-443
Everclear	Brown Eyed Girl	Capitol Records, Inc.	284-811
Everclear	El Distorto De Melodica	Capitol Records, Inc.	181-328
Everclear	Like a California King	Capitol Records, Inc.	181-328
Medeski Martin and Wood	Coconut Boogaloo	Capitol Records, Inc.	261-173
Medeski Martin and Wood	Everyday People	Capitol Records, Inc.	261-173
Medeski Martin and Wood	Hypnotized	Capitol Records, Inc.	261-173
Medeski Martin and Wood	Just Like I Pictured It	Capitol Records, Inc.	261-173
Medeski Martin and Wood	Latin Shuffle	Capitol Records, Inc.	261-173
Medeski Martin and Wood	No Ke Ano Ahiahi	Capitol Records, Inc.	261-173
Medeski Martin and Wood	Nocturne	Capitol Records, Inc.	261-173
Medeski Martin and Wood	Stop Start	Capitol Records, Inc.	261-173
Medeski Martin and Wood	Whatever Happened To Gus	Capitol Records, Inc.	261-173
Megadeath	A Tout Le Monde	Capitol Records, Inc.	258-062
Megadeath	Almost Honest	Capitol Records, Inc.	179-457
Megadeath	Ashes in your Mouth	Capitol Records, Inc.	175-385
Megadeath	Dawn Patrol	Capitol Records, Inc.	125-168
Megadeath	High Speed Dirt	Capitol Records, Inc.	175-385
Megadeath	Holy Wars...The Punishment Due	Capitol Records, Inc.	125-168
Poison	Every rose has its thorn	Capitol Records, Inc.	93-741

Tracking

Poison	Something To Believe In	Capitol Records, Inc.	119-355
Red Hot Chili Peppers	Higher Ground	Capitol Records, Inc.	107-737
Red Hot Chili Peppers	Sexy Mexican Maid	Capitol Records, Inc.	107-737
Red Hot Chili Peppers	Subway to Venus	Capitol Records, Inc.	107-737
Robbie Williams	Let Love Be Your Energy	Capitol Records, Inc.	297-254
Robbie Williams	Love calling earth	Capitol Records, Inc.	297-254
Robbie Williams	The Road To Mandalay	Capitol Records, Inc.	297-254
Sinead O'Connor	Black Boys On Mopeds	Capitol Records, Inc.	114-910
Sinead O'Connor	How Insensitive	Capitol Records, Inc.	176-428
Sinead O'Connor	Three babies	Capitol Records, Inc.	114-910
US3	Tukka Yoot's Riddim	Capitol Records, Inc.	265-788
Afghan Whigs	Be sweet	Elektra Entertainment Group Inc.	196-254
Afghan Whigs	Blame, Etc.	Elektra Entertainment Group Inc.	225-714
Afghan Whigs	Bulletproof	Elektra Entertainment Group Inc.	225-714
Afghan Whigs	Dark end of the street	Elektra Entertainment Group Inc.	209-886
Afghan Whigs	Double Day	Elektra Entertainment Group Inc.	225-714
Afghan Whigs	Faded	Elektra Entertainment Group Inc.	225-714
Afghan Whigs	Fountain and Fairfax	Elektra Entertainment Group Inc.	196-254
Afghan Whigs	Gentlemen	Elektra Entertainment Group Inc.	196-254
Afghan Whigs	Going to town	Elektra Entertainment Group Inc.	225-714
Afghan Whigs	I Keep Coming Back	Elektra Entertainment Group Inc.	196-254
Afghan Whigs	If I Were Going	Elektra Entertainment Group Inc.	196-254
Afghan Whigs	Little Girl Blue	Elektra Entertainment Group Inc.	209-886
Afghan Whigs	Mr. Superlove	Elektra Entertainment Group Inc.	209-886
Afghan Whigs	My Curse	Elektra Entertainment Group Inc.	196-254
Afghan Whigs	My Enemy	Elektra Entertainment Group Inc.	225-714
Afghan Whigs	Night By Candlelight	Elektra Entertainment Group Inc.	225-714
Afghan Whigs	Now You Know	Elektra Entertainment Group Inc.	196-254
Afghan Whigs	Step into the Light	Elektra Entertainment Group Inc.	225-714
Afghan Whigs	Summer's Kiss	Elektra Entertainment Group Inc.	225-714
Afghan Whigs	What Jail Is Like	Elektra Entertainment Group Inc.	209-886
Afghan Whigs	When We Two Parted	Elektra Entertainment Group Inc.	196-254
Better than Ezra	Happy Endings	Elektra Entertainment Group Inc.	225-706
Better than Ezra	Live Again	Elektra Entertainment Group Inc.	254-236
Bjork	5 years	Elektra Entertainment Group Inc.	245-199
Bjork	All Neon Like	Elektra Entertainment Group Inc.	245-199

Tracking

Bjork	Bachelorette	Elektra Entertainment Group Inc.	245-199
Bjork	Cover Me	Elektra Entertainment Group Inc.	235-219
Bjork	Hyperballad	Elektra Entertainment Group Inc.	235-219
Bread	Fancy Dancer	Elektra Entertainment Group Inc.	37-048
Bread	If	Elektra Entertainment Group Inc.	37-048
Bread	She's the only one	Elektra Entertainment Group Inc.	37-048
Breeders, The	Cannonball	Elektra Entertainment Group Inc.	192-191
Breeders, The	Divine Hammer	Elektra Entertainment Group Inc.	192-191
Busta Rhymes	Flipmode Squad Meets Def Squad	Elektra Entertainment Group Inc.	225-703
Busta Rhymes	Salute Da Gods!!!	Elektra Entertainment Group Inc.	281-391
Cars, The	A Dream Away	Elektra Entertainment Group Inc.	32-055
Cars, The	All Mixed Up	Elektra Entertainment Group Inc.	4-128
Cars, The	Candy-O	Elektra Entertainment Group Inc.	10-621
Cars, The	Coming Up You	Elektra Entertainment Group Inc.	83-981
Cars, The	Cruiser	Elektra Entertainment Group Inc.	32-055
Cars, The	Dangerous Type	Elektra Entertainment Group Inc.	10-621
Cars, The	Don't Cha Stop	Elektra Entertainment Group Inc.	4-128
Cars, The	Don't Tell Me No	Elektra Entertainment Group Inc.	20-897
Cars, The	Down Boys	Elektra Entertainment Group Inc.	20-897
Cars, The	Everything You Say	Elektra Entertainment Group Inc.	83-981
Cars, The	Fine Line	Elektra Entertainment Group Inc.	83-981
Cars, The	Getting Through	Elektra Entertainment Group Inc.	20-897
Cars, The	Gimme Some Slack	Elektra Entertainment Group Inc.	20-897
Cars, The	Go Away	Elektra Entertainment Group Inc.	83-981
Cars, The	Just What I Needed	Elektra Entertainment Group Inc.	4-128
Deee Lite	Apple Juice Kissing	Elektra Entertainment Group Inc.	193-759
Deee Lite	Bittersweet Loving	Elektra Entertainment Group Inc.	193-759
Deee Lite	Bring Me Your Love	Elektra Entertainment Group Inc.	193-759
Deee Lite	Call Me	Elektra Entertainment Group Inc.	193-759
Deee Lite	Picnic In The Summertime	Elektra Entertainment Group Inc.	193-759
Deee Lite	River Of Freedom	Elektra Entertainment Group Inc.	193-759
Deee Lite	Sampladelic	Elektra Entertainment Group Inc.	193-759
Del Tha Funkie Homosapien	What Is A Booty	Elektra Entertainment Group Inc.	169-840
Eagles, The	Heartache Tonight	Elektra Entertainment Group Inc.	13-182
En Vogue	Don't Let Go (Love)	Elektra Entertainment Group Inc.	188-664
En Vogue	No Fool No More	Elektra Entertainment Group Inc.	179-894

Tracking

Flipmode Squad	Do For Self	Elektra Entertainment Group Inc.	254-201
Flipmode Squad	To My People	Elektra Entertainment Group Inc.	254-201
Flipmode Squad	We Got U Opin (Part 2) F/Buckshot	Elektra Entertainment Group Inc.	254-201
Flipmode Squad	Where You Think You Goin'	Elektra Entertainment Group Inc.	254-201
Jackson Browne	Everywhere I Go	Elektra Entertainment Group Inc.	193-976
Jackson Browne	I'll Do Anything	Elektra Entertainment Group Inc.	193-976
Jackson Browne	I'm Alive	Elektra Entertainment Group Inc.	193-976
Merchant, Natalie	Kind & Generous	Elektra Entertainment Group Inc.	255-044
Merchant, Natalie	When They Ring The Golden Bells	Elektra Entertainment Group Inc.	255-044
Metal Church	Rest In Pieces (April 15, 1912)	Elektra Entertainment Group Inc.	103-784
Metallica	(Anesthesia)--Pulling Teeth	Elektra Entertainment Group Inc.	118-784
Metallica	2 x 4	Elektra Entertainment Group Inc.	227-734
Metallica	Astronomy	Elektra Entertainment Group Inc.	287-026
Metallica	Blackened	Elektra Entertainment Group Inc.	97-022
Metallica	Cure	Elektra Entertainment Group Inc.	227-734
Metallica	Die, Die My Darling	Elektra Entertainment Group Inc.	287-026
Metallica	Last Caress/Green Hell	Elektra Entertainment Group Inc.	287-026
Missy Elliot	Beat Biters	Elektra Entertainment Group Inc.	179-190
Missy Elliot	Beep Me 911	Elektra Entertainment Group Inc.	245-232
Missy Elliot	Best Friends	Elektra Entertainment Group Inc.	245-232
Missy Elliot	Busa Rhyme	Elektra Entertainment Group Inc.	179-190
Missy Elliot	Don't Be Commin' (In My Face)	Elektra Entertainment Group Inc.	245-232
Missy Elliot	Gettaway	Elektra Entertainment Group Inc.	245-232
Missy Elliot	I'm Talkin'	Elektra Entertainment Group Inc.	245-232
Missy Elliot	Mysterious - Intro	Elektra Entertainment Group Inc.	179-190
Missy Elliot	Religious Blessings (Outro)	Elektra Entertainment Group Inc.	179-190
Missy Elliot	Smooth Chick	Elektra Entertainment Group Inc.	179-190
Missy Elliot	Sock It 2 Me	Elektra Entertainment Group Inc.	245-232
Missy Elliot	The Rain (Supa Dupa Fly)	Elektra Entertainment Group Inc.	245-232
Missy Elliot	We Did It	Elektra Entertainment Group Inc.	179-190
Missy Elliot	You Can't Resist	Elektra Entertainment Group Inc.	179-190
Tracy Chapman	All That You Have Is Your Soul	Elektra Entertainment Group Inc.	110-722
Tracy Chapman	At This Point In My Life	Elektra Entertainment Group Inc.	188-489
Tracy Chapman	Bang Bang Bang	Elektra Entertainment Group Inc.	145-716
Tracy Chapman	Be Careful Of My Heart	Elektra Entertainment Group Inc.	110-722
Tracy Chapman	Open Arms	Elektra Entertainment Group Inc.	145-716

Tracking

Yolanda Adams	Born this day	Elektra Entertainment Group Inc.	293-083
Yolanda Adams	Fragile Heart	Elektra Entertainment Group Inc.	278-575
Yolanda Adams	Little drummer boy	Elektra Entertainment Group Inc.	293-083
Lorenzo Antonio	El No Te Quiere	Fonovisa, Inc.	208-797
Marco Antonio Solis	Desde Que Te Perdi	Fonovisa, Inc.	249-031
Marco Antonio Solis	Si Te Pudiera Mentir	Fonovisa, Inc.	264-718
Noelia	Candela	Fonovisa, Inc.	264-573
Noelia	Tu	Fonovisa, Inc.	264-573
Eminem	Bad Meets Evil	Interscope Records	262-686
Eminem	Bonnie & Clyde	Interscope Records	262-686
Eminem	I'm Shady	Interscope Records	262-686
Eminem	Kill You	Interscope Records	280-854
Eminem	My Fault	Interscope Records	262-686
Eminem	Role Model	Interscope Records	262-686
Outkast	Ms. Jackson	LaFace Records	306-711
Outkast	So Fresh & So Clean	LaFace Records	306-711
Pink	Most Girls	LaFace Records	279-958
Pink	There You Go	LaFace Records	279-958
98 Degrees	Because of You	Motown Record Company, L.P.	237-315
Boyz II Men	Little Things	Motown Record Company, L.P.	212-333
Commodores	Oh No	Motown Record Company, L.P.	27-457
Diana Ross	Have Fun (Again)	Motown Record Company, L.P.	17-850
Bad Religion	American Jesus	Sony Music Entertainment Inc.	172-147
Bad Religion	Punk Rock Song(German Language Version)	Sony Music Entertainment Inc.	224-452
Blue Oyster Cult	Burnin' For You	Sony Music Entertainment Inc.	29-371
Bonnie Tyler	Holding Out For A Hero	Sony Music Entertainment Inc.	276-119
Bruce Cockburn	Burden Of The Angel/Beast	Sony Music Entertainment Inc.	188-296
Celine Dion	All By Myself	Sony Music Entertainment Inc.	224-159
Celine Dion	Be The Man	Sony Music Entertainment Inc.	248-109
Celine Dion	Declaration Of Love	Sony Music Entertainment Inc.	224-159
Celine Dion	Destin	Sony Music Entertainment Inc.	211-677
Celine Dion	I hate You Then I Love You	Sony Music Entertainment Inc.	248-109
Celine Dion	I Love You, Goodbye	Sony Music Entertainment Inc.	144-117
Celine Dion	If We Could Start All Over Again	Sony Music Entertainment Inc.	124-245
Celine Dion	I'm Your Angel (with R. Kelly)	Sony Music Entertainment Inc.	264-455
Celine Dion	Just A Little Bit Of Love	Sony Music Entertainment Inc.	144-117

Tracking

Celine Dion	Let's Talk About Love	Sony Music Entertainment Inc.	248-109
Celine Dion	Love Is On The Way	Sony Music Entertainment Inc.	248-109
Celine Dion	Miles To Go (Before I Sleep)	Sony Music Entertainment Inc.	248-109
Celine Dion	My Heart Will Go On	Sony Music Entertainment Inc.	248-109
Celine Dion	Nothing Broken But My Heart	Sony Music Entertainment Inc.	144-117
Celine Dion	Seduces Me	Sony Music Entertainment Inc.	224-159
Celine Dion	Tell Him(Duet With Barbra Streisand)	Sony Music Entertainment Inc.	248-109
Celine Dion	The Reason	Sony Music Entertainment Inc.	248-109
Celine Dion	To Love You More	Sony Music Entertainment Inc.	248-109
Celine Dion	Where Is The Love	Sony Music Entertainment Inc.	248-109
Celine Dion	Why Oh Why	Sony Music Entertainment Inc.	248-109
Charlie Daniels	Alligator	Sony Music Entertainment Inc.	96-558
Charlie Daniels	Big Bad John	Sony Music Entertainment Inc.	96-558
Charlie Daniels	In America	Sony Music Entertainment Inc.	20-167
Charlie Daniels	Let Freedom Ring	Sony Music Entertainment Inc.	131-525
Charlie Daniels	Midnight Train	Sony Music Entertainment Inc.	86-558
Charlie Daniels	Powder Keg	Sony Music Entertainment Inc.	83-656
Charlie Daniels	Saturday Night U.S.A	Sony Music Entertainment Inc.	83-656
Charlie Daniels	Trapped In The City	Sony Music Entertainment Inc.	83-656
Cheap Trick	If You Want My Love You Got It	Sony Music Entertainment Inc.	36-677
Earth, Wind And Fire	Let Me Talk	Sony Music Entertainment Inc.	24-260
Electric Light Orchestra	Don't Bring Me Down	Sony Music Entertainment Inc.	12-943
Electric Light Orchestra	Loser Gone Wild	Sony Music Entertainment Inc.	46-784
James Taylor	Everybody Loves To Cha Cha Cha	Sony Music Entertainment Inc.	135-070
James Taylor	Limousine Driver	Sony Music Entertainment Inc.	68-536
James Taylor	Mona	Sony Music Entertainment Inc.	68-536
James Taylor	Turn Away	Sony Music Entertainment Inc.	58-536
Jamiroquai	Half The Man	Sony Music Entertainment Inc.	299-885
Junkhouse	This Old Man's(Too Drunk To Drive)	Sony Music Entertainment Inc.	197-187
Kris Kristofferson	Lay Me Down (and Love The World Aw	Sony Music Entertainment Inc.	1-320
Marvin Gaye	Sexual Healing	Sony Music Entertainment Inc.	41-568
Men At Work	Be Good Johnny	Sony Music Entertainment Inc.	35-328
Midnight Oil	Is It Now	Sony Music Entertainment Inc.	124-239
Quiet Riot	Cum On Feel The Noize	Sony Music Entertainment Inc.	44-868
Quiet Riot	Mama Weer All Craze Now	Sony Music Entertainment Inc.	126-668
Quiet Riot	The Wild And The Young	Sony Music Entertainment Inc.	77-609

Tracking

Sade	Cherish The Day	Sony Music Entertainment Inc.	183-731
Sade	Hang On To your Love	Sony Music Entertainment Inc.	69-105
Sade	Is It a Crime	Sony Music Entertainment Inc.	71-848
Sade	Like A Tattoo	Sony Music Entertainment Inc.	183-731
Sade	Never As Good As The First Time	Sony Music Entertainment Inc.	71-848
Sade	Smooth Operator	Sony Music Entertainment Inc.	69-105
Sade	Why Can't We Live Together	Sony Music Entertainment Inc.	69-105
Sade	I Will Be Your Friend	Sony Music Entertainment Inc.	69-105
Spandau Ballet	Barricades(Introduction)	Sony Music Entertainment Inc.	82-150
Spandau Ballet	Cross The Line	Sony Music Entertainment Inc.	82-150
Spandau Ballet	Man In Chains	Sony Music Entertainment Inc.	82-150
Spandau Ballet	Snakes and Lovers	Sony Music Entertainment Inc.	82-150
Spandau Ballet	Swept	Sony Music Entertainment Inc.	82-150
Spandau Ballet	Virgin	Sony Music Entertainment Inc.	82-150
The Bangles	Be With You	Sony Music Entertainment Inc.	99-316
The Bangles	Crash And Burn	Sony Music Entertainment Inc.	99-316
The Bangles	Dover Beach	Sony Music Entertainment Inc.	56-436
The Bangles	Hero Takes A Fall	Sony Music Entertainment Inc.	56-436
The Bangles	James	Sony Music Entertainment Inc.	56-436
The Bangles	September Gurls	Sony Music Entertainment Inc.	68-534
The Bangles	Walking Right Down Your Street	Sony Music Entertainment Inc.	68-534
The Clash	Clash City Rockers	Sony Music Entertainment Inc.	11-222
The Clash	Koka Kola	Sony Music Entertainment Inc.	16-270
The Clash	Lost In The Supermarket	Sony Music Entertainment Inc.	16-270
The Clash	Should I Stay Or Should I Go	Sony Music Entertainment Inc.	34-959
The Manhattan's	Kiss and Say Goodbye	Sony Music Entertainment Inc.	55-771
The Outfield	Say It Isn't So	Sony Music Entertainment Inc.	75-467
The Romantics	One In A Million	Sony Music Entertainment Inc.	52-168
The Romantics	Rock You Up	Sony Music Entertainment Inc.	52-168
The Romantics	Talking In Your Sleep	Sony Music Entertainment Inc.	52-168
Abba	Andante, Andante	UMG Recordings, Inc.	24-153
Abba	Lay All Your Love on Me	UMG Recordings, Inc.	24-153
Abba	Super Trouper	UMG Recordings, Inc.	24-153
Abba	Take A Chance On Me	UMG Recordings, Inc.	71
Abba	The Winner Takes It All	UMG Recordings, Inc.	24-153
Abba	When All Is Said And Done	UMG Recordings, Inc.	31-826

Tracking

Beastie Boys	Girls	UMG Recordings, Inc.	79-470
Beastie Boys	Paul Revere	UMG Recordings, Inc.	79-470
Capleton	Chant	UMG Recordings, Inc.	169-329
DMX	Ate	UMG Recordings, Inc.	252-613
DMX	Bring Your Whole Crew	UMG Recordings, Inc.	188-987
DMX	Crime Story	UMG Recordings, Inc.	252-613
DMX	Damien	UMG Recordings, Inc.	252-613
DMX	Dogs For Life	UMG Recordings, Inc.	188-987
DMX	Don't You Ever	UMG Recordings, Inc.	279-017
DMX	D-X-L (Hard White)	UMG Recordings, Inc.	279-017
DMX	Flesh of My Flesh, Blood of My Blood	UMG Recordings, Inc.	188-987
DMX	For My Dogs	UMG Recordings, Inc.	252-613
DMX	Get At Me Dog	UMG Recordings, Inc.	252-613
DMX	Good Girls, Bad Guys	UMG Recordings, Inc.	279-017
DMX	Here We Go Again	UMG Recordings, Inc.	279-017
DMX	How's It Goin' Down	UMG Recordings, Inc.	252-613
DMX	No Love For Me	UMG Recordings, Inc.	188-987
DMX	One More Road To Cross	UMG Recordings, Inc.	279-017
DMX	Party Up	UMG Recordings, Inc.	279-017
DMX	Ready To Meet Him	UMG Recordings, Inc.	188-987
DMX	Ruff Ryders Anthem	UMG Recordings, Inc.	252-613
DMX	Slippin'	UMG Recordings, Inc.	188-987
DMX	Stop Being Greedy	UMG Recordings, Inc.	252-613
DMX	The Professional	UMG Recordings, Inc.	279-017
DMX	What's My Name	UMG Recordings, Inc.	279-017
Domino	Sweet Potato Pie	UMG Recordings, Inc.	174-455
Eiffel 65	Blue (Da Ba Dee)	UMG Recordings, Inc.	258-753
Eiffel 65	Europop	UMG Recordings, Inc.	258-753
Eiffel 65	Move Your Body	UMG Recordings, Inc.	258-753
Eiffel 65	My Console	UMG Recordings, Inc.	258-753
Falco	Rock Me Amadeus	UMG Recordings, Inc.	69-802
Duelo	Quise	Univision Music LLC	pending
IMAN	1-2-3	Univision Music LLC	pending
Johnny Ray	Mi Manera De Amar	Univision Music LLC	pending
La Contra	La Frontera	Univision Music LLC	pending
Pilar Montenegro	Algo Especial	Univision Music LLC	pending

Tracking

Pilar Montenegro	Desahogo	Univision Music LLC	pending
Kelis	Caught Out There	Virgin Records America, Inc.	277-087
Kelis	Good Stuff	Virgin Records America, Inc.	277-087
Lenny Kravitz	Always on the run	Virgin Records America, Inc.	128-345
Lenny Kravitz	Are You gonna go my way	Virgin Records America, Inc.	149-143
Lenny Kravitz	Believe	Virgin Records America, Inc.	149-143
Lenny Kravitz	Black Girl	Virgin Records America, Inc.	149-143
Lenny Kravitz	Butterfly	Virgin Records America, Inc.	128-345
Lenny Kravitz	Come on and love me	Virgin Records America, Inc.	149-143
Lenny Kravitz	Fields of Joy	Virgin Records America, Inc.	128-345
Lenny Kravitz	Is there any love in your heart?	Virgin Records America, Inc.	149-143
Lenny Kravitz	It ain't over til it's over	Virgin Records America, Inc.	128-345
Lenny Kravitz	Let Love Rule	Virgin Records America, Inc.	111-095
Lenny Kravitz	More than anything in this world	Virgin Records America, Inc.	128-345
Lenny Kravitz	Mr. Cab Driver	Virgin Records America, Inc.	111-095
Lenny Kravitz	My Love	Virgin Records America, Inc.	149-143
Lenny Kravitz	Sister	Virgin Records America, Inc.	149-143
Lenny Kravitz	Sitting on Top of the World	Virgin Records America, Inc.	111-095
Lenny Kravitz	Stand by my woman	Virgin Records America, Inc.	128-345
Lenny Kravitz	Stop draggin' around	Virgin Records America, Inc.	128-345
Lenny Kravitz	What the .. Are we saying?	Virgin Records America, Inc.	128-345
Backstreet Boys	As Long As You Love Me	Zomba Recording Corporation	250-678
Backstreet Boys	I want it that way	Zomba Recording Corporation	275-134
Backstreet Boys	Larger than life	Zomba Recording Corporation	275-134
Joe	Good Girls	Zomba Recording Corporation	250-366
Mystikal	Born to be a Soldier	Zomba Recording Corporation	250-373
R. Kelly	12 Play	Zomba Recording Corporation	288-094
R. Kelly	Bump N Grind	Zomba Recording Corporation	288-094
R. Kelly	Dedicated	Zomba Recording Corporation	288-088
R. Kelly	I Believe I Can Fly	Zomba Recording Corporation	260-868
R. Kelly	Sex Me	Zomba Recording Corporation	288-094
R. Kelly	Slow Dance	Zomba Recording Corporation	288-088
R. Kelly	Tempo Slow	Zomba Recording Corporation	217-354
Too Short	Couldn't be a Better Player	Zomba Recording Corporation	260-872
UGK	Murder	Zomba Recording Corporation	225-371
UGK	Pinky Ring	Zomba Recording Corporation	225-371

ARTIST NAME	SONG TITLE	COPYRIGHT PLAINTIFF	SR Numbers
Elvis Presley	(Let Me Be Your) Teddy Bear	BMG Music d/b/a The RCA Records Label	pre-72
Elvis Presley	That's What You Get For Loving Me	BMG Music d/b/a The RCA Records Label	pre-72
Beach Boys	Barbara Ann	Capitol Records, Inc.	pre-72
Beatles	Birthday	Capitol Records, Inc.	pre-72
Beatles	Can't buy me love	Capitol Records, Inc.	pre-72
Beatles	Cry Baby Cry	Capitol Records, Inc.	pre-72
Beatles	Day tripper	Capitol Records, Inc.	pre-72
Beatles	Dear prudence	Capitol Records, Inc.	pre-72
Beatles	Eight days a week	Capitol Records, Inc.	pre-72
Beatles	Glass Onion	Capitol Records, Inc.	pre-72
Beatles	Happiness Is A Warm Gun	Capitol Records, Inc.	pre-72
Beatles	Help!	Capitol Records, Inc.	pre-72
Beatles	I feel Fine	Capitol Records, Inc.	pre-72
Beatles	I'm so tired	Capitol Records, Inc.	pre-72
Beatles	Let it be	Capitol Records, Inc.	pre-72
Beatles	Martha My dear	Capitol Records, Inc.	pre-72
Beatles	Nowhere man	Capitol Records, Inc.	pre-72
Beatles	Only a northern song	Capitol Records, Inc.	pre-72
Beatles	Paperback writer	Capitol Records, Inc.	pre-72
Beatles	Revolution 1	Capitol Records, Inc.	pre-72
Beatles	Revolution 9	Capitol Records, Inc.	pre-72
Beatles	Sexy Sadie	Capitol Records, Inc.	pre-72
Beatles	Sgt. Pepper's Lonely Hearts Club Band	Capitol Records, Inc.	pre-72
Beatles	Something	Capitol Records, Inc.	pre-72
Beatles	The Long And Winding Road	Capitol Records, Inc.	pre-72
Doors, The	Five To One	Elektra Entertainment Group Inc.	pre-72
Doors, The	I Can't See Your Face In My Mind	Elektra Entertainment Group Inc.	pre-72
Doors, The	L.A. Woman	Elektra Entertainment Group Inc.	pre-72
Doors, The	Love Her Madly	Elektra Entertainment Group Inc.	pre-72
Doors, The	Love Me Two Times	Elektra Entertainment Group Inc.	pre-72
Doors, The	Peace Frog	Elektra Entertainment Group Inc.	pre-72
Doors, The	People Are Strange	Elektra Entertainment Group Inc.	pre-72
Doors, The	Roadhouse Blues	Elektra Entertainment Group Inc.	pre-72
Doors, The	The Unknown Soldier	Elektra Entertainment Group Inc.	pre-72

Doors, The	Waiting For The Sun	Elektra Entertainment Group Inc.	pre-72
Doors, The	When The Music's Over	Elektra Entertainment Group Inc.	pre-72
Kris Kristofferson	The Silver Tongued Devil and I	Sony Music Entertainment Inc.	pre-72
Kris Kristofferson	The Taker	Sony Music Entertainment Inc.	pre-72
Leonard Cohen	Bird On A Wire	Sony Music Entertainment Inc.	pre-72
Leonard Cohen	Famous Blue Raincoat	Sony Music Entertainment Inc.	pre-72
Leonard Cohen	Suzanne	Sony Music Entertainment Inc.	pre-72
Leonard Cohen	The Partisan	Sony Music Entertainment Inc.	pre-72
Miles Davis	Old Folks	Sony Music Entertainment Inc.	pre-72
Roy Orbison	Pretty Woman	Sony Music Entertainment Inc.	pre-72
Roy Orbison	Running Scared	Sony Music Entertainment Inc.	pre-72
Roy Orbison	Working For The Man	Sony Music Entertainment Inc.	pre-72
Santana	Hope You're Feeling Better	Sony Music Entertainment Inc.	pre-72
Santana	Persuasion	Sony Music Entertainment Inc.	pre-72
Simon and Garfunkel	A Most Peculiar Man	Sony Music Entertainment Inc.	pre-72
Simon and Garfunkel	Anji	Sony Music Entertainment Inc.	pre-72
Simon and Garfunkel	April Come She Will	Sony Music Entertainment Inc.	pre-72
Simon and Garfunkel	I Am A Rock	Sony Music Entertainment Inc.	pre-72
Simon and Garfunkel	Leaves That Are Green	Sony Music Entertainment Inc.	pre-72
Simon and Garfunkel	Mrs. Robinson	Sony Music Entertainment Inc.	pre-72
Simon and Garfunkel	On The Strip	Sony Music Entertainment Inc.	pre-72
Simon and Garfunkel	Richard Cory	Sony Music Entertainment Inc.	pre-72
Simon and Garfunkel	Scarborough Fair	Sony Music Entertainment Inc.	pre-72
Simon and Garfunkel	Somewhere They Can't Find Me	Sony Music Entertainment Inc.	pre-72
Simon and Garfunkel	The Big Bright Green Pleasure Machine	Sony Music Entertainment Inc.	pre-72
Simon and Garfunkel	The Folks	Sony Music Entertainment Inc.	pre-72
Simon and Garfunkel	The Sound Of Silence	Sony Music Entertainment Inc.	pre-72
Simon and Garfunkel	We've Got A Groovy Thing Goin'	Sony Music Entertainment Inc.	pre-72
Simon and Garfunkel	Whew	Sony Music Entertainment Inc.	pre-72
Soft Machine	Fletcher's Blemish	Sony Music Entertainment Inc.	pre-72
Soft Machine	Kings and Queens	Sony Music Entertainment Inc.	pre-72
Soft Machine	Teeth	Sony Music Entertainment Inc.	pre-72
Soft Machine	The French Lesson	Sony Music Entertainment Inc.	pre-72
Tammy Wynette	Honey (I Miss You)	Sony Music Entertainment Inc.	pre-72
The Byrds	Mr Tambourine Man	Sony Music Entertainment Inc.	pre-72

The Byrds	Turn, Turn, Turn	Sony Music Entertainment Inc.	pre-72
The Hi - Lo's	The Heather On The Hill	Sony Music Entertainment Inc.	pre-72
Van Morrison	Brown Eyed Girl	Sony Music Entertainment Inc.	pre-72
Van Morrison	Goodbye Baby	Sony Music Entertainment Inc.	pre-72
Van Morrison	Madame George	Sony Music Entertainment Inc.	pre-72
Bob Dylan	Desolation Row	Sony Music Entertainment Inc.	pre-72
Bob Dylan	Girl From The North Country(With John	Sony Music Entertainment Inc.	pre-72
Carole King	Up On The Roof	Sony Music Entertainment Inc.	pre-72
Frank Sinatra	All Or Nothing At All	Sony Music Entertainment Inc.	pre-72
Frank Sinatra	Nancy(With The Laughing Face)	Sony Music Entertainment Inc.	pre-72
Johnny Cash	Ring Of Fire	Sony Music Entertainment Inc.	pre-72
Johnny Cash	The Rebel Johnny Yuma	Sony Music Entertainment Inc.	pre-72
Billie Holiday	A Fine Romance	UMG Recordings, Inc.	pre-72
Billie Holiday	All Of Me	UMG Recordings, Inc.	pre-72
Billie Holiday	Autumn in New York	UMG Recordings, Inc.	pre-72



Exhibit C – Copyrighted Musical Compositions

Named Plaintiff	Title of Musical Composition	Author(s)
Mike Stoller Music, Jerry Leiber Music	Jailhouse Rock	Jerry Leiber, Mike Stoller
Mike Stoller Music, Jerry Leiber Music	Love Potion #9	Jerry Leiber, Mike Stoller
Mike Stoller Music, Jerry Leiber Music	Yakety Yak	Jerry Leiber, Mike Stoller
Mike Stoller Music, Jerry Leiber Music	Poison Ivy	Jerry Leiber, Mike Stoller
Mike Stoller Music, Jerry Leiber Music	Stand By Me	Jerry Leiber, Mike Stoller, Ben E. King
Mike Stoller Music, Jerry Leiber Music	Along Came Jones	Jerry Leiber, Mike Stoller
Mike Stoller Music, Jerry Leiber Music	Charlie Brown	Jerry Leiber, Mike Stoller
Mike Stoller Music, Jerry Leiber Music	Fools Fall In Love	Jerry Leiber, Mike Stoller
Mike Stoller Music, Jerry Leiber Music	Ruby Baby	Jerry Leiber, Mike Stoller
Mike Stoller Music, Jerry Leiber Music	Smokey Joe's Café	Jerry Leiber, Mike Stoller
Mike Stoller Music, Jerry Leiber Music	Treat Me Nice	Jerry Leiber, Mike Stoller
Jerry Leiber Music	Spanish Harlem	Jerry Leiber, Phil Spector
Famous Music Corp.	Moon River	Henry Mancini, Johnny Mercer
Famous Music Corp.	A Time For Us	Larry Kusik, Eddie Snyder, Nino Rota
Famous Music Corp.	Speak Softly Love (a/k/a/ Theme from The Godfather)	Larry Kusik, Nino Rota
Famous Music Corp.	Up Where We Belong	Jack Nitzsche, Buffy Sainte-Marie, Will Jennings
Famous Music Corp.	Wifey	R.L. Hugger, Keir Gist, Eddie Berkeley
Famous Music Corp.	Nobody's Supposed to Be Here	Montell Jordan and Anthony "Shep" Crawford
Famous Music Corp.	Rock The Party (Off The Hook)	Noah Bernardo, Paul

Exhibit C – Copyrighted Musical Compositions

		Sandoval, Mark Daniels, Marcos Curiel
Famous Music Corp.	Lit Up	Joshua Todd, Keith Nelson, Jonathan Brightman, Devon Glenn
Famous Music Corp.	Get It On Tonight	Montell Jordan, Joerg Evers, Juergen Korduletsch, Sergio Moore, Darren Benbow, Antoine Wilson, Brian Palmer
Ensign Music Corp.	I Hope You Dance	Tia Sillers, Mark D. Sanders
Ensign Music Corp.	I Don't Want To Wait	Paula Cole
Ensign Music Corp.	Can I Get A...	Irving Lorenzo, Rob Mays, Shawn Carter, Jeffrey Atkins
Ensign Music Corp.	One Sweet Day	Michael McCary, Nathan Morris, Wanya Morris, Shawn Stockman, Mariah Carey and Walter Afanasieff

Exhibit C – Copyrighted Musical Compositions

Ensign Music Corp.	The Boy Is Mine	Fred Jerkins III, Rodney Jerkins, LaShawn Daniels, Japhe Tejada, Brandy Norwood
Ensign Music Corp.	Call Me	Giorgio Moroder, Deborah Harry
Ensign Music Corp.	Holla Holla	Irving Lorenzo, Jeffrey Atkins, Taiwan Green
Bruin Music Corp.	Mission Impossible – Theme	Lalo Schifrin



Music Search

whitney houston



--- Jump To ---



blue993300 home

For Better Performance Gold Members can use dedicated servers at fast.audiogalaxy.com

Found Exact Match:

[see all 5760 matches](#)**whitney houston**

Pop, Dance Pop, Contemporary R&B, Quiet Storm

[460 comments](#) [all songs](#)Other listeners liked [mariah carey](#), [celine dion](#), [gospel](#), [kirk franklin](#)











ADD TO FAVORITES | ALL ARTISTS STARTING "W"

All Songs 1-25 of 5760 songs

sort by **Popularity**


HINT: To queue the most popular bitrate/size of a song click on the Satellite icon

- | | | |
|--|--|---|
| | | whitney houston - <i>i will always love you</i> |
| | | whitney houston - <i>my love is your love</i> |
| | | whitney houston - <i>heartbreak hotel</i> |
| | | whitney houston - <i>i wanna dance with somebody</i> |
| | | whitney houston - <i>greatest love of all</i> |
| | | whitney houston - <i>one moment in time</i> |
| | | whitney houston - <i>it's not right but it's okay</i> |
| | | whitney houston - <i>i'll Will Always Love You</i> |
| | | whitney houston - <i>the star spangled banner</i> |
| | | whitney houston - <i>i love nothing</i> |
| | | whitney houston - <i>i learned from the best</i> |
| | | whitney houston - <i>how will i know</i> |
| | | whitney houston - <i>my love is your love (dance remix)</i> |
| | | whitney houston - <i>i'm every woman</i> |
| | | whitney houston - <i>run to you</i> |
| | | whitney houston - <i>saving all my love for you</i> |
| | | whitney houston - <i>didn't we almost have it all</i> |
| | | whitney houston - <i>it's not right but it's ok</i> |
| | | whitney houston - <i>why does it hurt so bad</i> |
| | | whitney houston - <i>where do broken hearts go</i> |

-   whitney houston - *i believe in you and me*
-   whitney houston - *do you hear what i hear*
-   whitney houston - *step by step*
-   whitney houston - *exhale*
-   whitney houston - *i wanna run to you*

1 2 3 4 5 6 7 8 9 10 next >>

KEY:

 Availability
  Play
  Satellite
  Direct Download
  Buy CD

expand ↓

Message Board

- 05/22/02 ramonsuave - **butterfly better than My love is your love** (179 replies)
- 05/22/02 LevuW - **HEY CHECK OUT THE BOMB 11YRS OLD KIMBERLY SCOTT**
- 05/21/02 there_nutr - **IS WHITNEY STILL ON CRACK ? ? ? &nbs** (1 reply)
- 05/21/02 dhalwood - **Tell me something about yourself, concept of who u r.** (8 replies)
- 05/20/02 Whitneyisdabomb - **Diva's 2002** (13 replies)
- 05/20/02 mickymickster85 - **EUROPE'S LIVING A CELEBRATION!!! LISTEN TO IT**
- 05/20/02 mickymickster85 - **CHECK THIS SONG! IT DESERVES TO WIN THIS YEAR!!!**
- 05/19/02 bsgt - **Whitney's drug addiction** (2 replies)
- 05/19/02 Whitneyisdabomb - **Bobby Brown** (9 replies)
- 05/19/02 Dresick20 - **Read this piece of info about Whitne... wasteless!!** (25 replies)
- 05/19/02 upchugi - **Whitneys voice is not what it used to be** (29 replies)
- 05/19/02 Whitneyisdabomb - **ja rule and ashanti**
- 05/19/02 marlon80 - **top 10 favorite whitney up-tempo songs** (11 replies)
- 05/19/02 Whitneyisdabomb - **New release date: August 6th** (3 replies)
- 05/18/02 Jason_Kay - **Battle of divas. Which do you prefer?** (3 replies)
- 05/15/02 marlon80 - **my favorite top 10 whitney ballads** (14 replies)
- 05/15/02 marlon80 - **WHAT DO YOU THINK WILL BE A GOOD MARKETING STRATEGY** (15 replies)
- 05/15/02 Whitneyisdabomb - **Whitney top 5** (14 replies)
- 05/15/02 ZandeeTheDon - **Make money NOW! UNBELIEVABLE!!** (4 replies)
- 05/15/02 dhalwood - **Whitney : Female by birth and Diva by GOD ! Disagree?** (25 replies)
- 05/10/02 ErosLove - **looking for Queen of the night (Movie version)**
- 05/10/02 keejaejov050065 - **What's The Deal With Doggin Whitney?** (4 replies)
- 05/09/02 zuzaaa - **Do you agree that Hero copied Greatest Love?** (11 replies)
- 05/08/02 ELVIS_Aaron_71 - **hello can somebody send me the whitney songs "any** (1 reply)
- 05/07/02 malotibp - **how is her new cd** (4 replies)

older threads >>

SUBJECT:

MESSAGE:

post message



Music Search

--- Jump To ---

http://www.audiogalaxy.com/home

For Better Performance Gold Members can use dedicated servers at fast.audiogalaxy.com**whitney houston - heartbreak hotel**

Audiogalaxy does not currently host this song, but you can use the Audiogalaxy Satellite system to locate other users who are sharing this song.

whitney houston - heartbreak hotel

choose version

GET MOST POPULAR VERSION

- or -

accept only copies matching bitrate

128 kbps

common

160 kbps

192 kbps

near cd quality

256 kbps

320 kbps

rare

- or -

Click [here](#) for an exact version

Applying a bitrate preference to your request may decrease your chances of getting this song. Your satellite will only be able to download the song if another user is sharing this song with the chosen bitrate. To get the song with the highest availability click "GET MOST POPULAR VERSION"

Get the latest version of the Audiogalaxy Satellite here - [Download Satellite](#)

USER AGREEMENT · CONTACT INFO · PRIVACY POLICY

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Music Search



--- Jump To ---



http://www.audiogalaxy.com/home

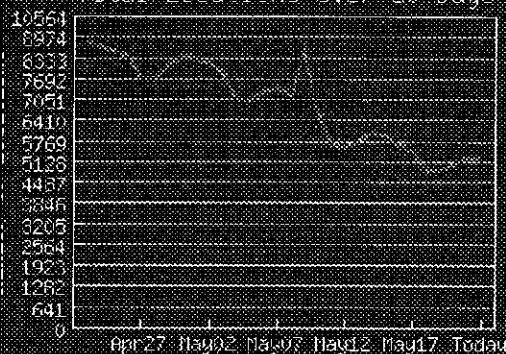
For Better Performance Gold Members can use dedicated servers at fast.audiogalaxy.com*heartbreak hotel* by whitney houston

File size	Bit Rate	Play Time	Locations
● 6,732,828	192 kbps	4:40	3362
● 6,732,828	192 kbps	4:40	285
● 4,502,802	128 kbps	4:41	179
● 4,493,174	128 kbps	4:40	114
● 3,892,622	110 kbps	4:43	84
● 4,495,212	128 kbps	4:40	68
● 4,497,408	128 kbps	4:41	67
● 4,505,600	128 kbps	4:41	46
● 4,501,504	128 kbps	4:41	43
● 4,493,046	128 kbps	4:40	41
● 6,733,824	192 kbps	4:40	40
● 4,495,064	128 kbps	4:40	27
● 4,491,284	128 kbps	4:40	26
● 4,544,593	128 kbps	4:44	22
● 4,520,228	128 kbps	4:42	21
● 6,731,776	192 kbps	4:40	20
● 4,801,493	128 kbps	4:41	20
● 6,734,876	192 kbps	4:40	20
● 4,495,360	128 kbps	4:40	18
● 4,495,212	128 kbps	4:40	17
● 5,549,382	160 kbps	4:37	15
● 6,732,700	192 kbps	4:40	15
● 4,492,834	128 kbps	4:40	14
● 6,750,208	192 kbps	4:41	14
● 4,292,608	128 kbps	4:28	12
● 4,931,584	160 kbps	4:06	12
● 10,456,443	160 kbps	8:42	11
● 6,732,828	192 kbps	4:40	10
● 4,499,456	128 kbps	4:41	9
● 3,957,237	128 kbps	4:07	9

Locations of *heartbreak hotel*

This graph displays the number of locations that contained "heartbreak hotel" by whitney houston each day for the last thirty days.

Total Locations Over 30 Days



ALL-STATE'S LEGAL 800-222-0610 EDR11 RECYCLED



3 of 68 DOCUMENTS

Copyright 2002 Cox Enterprises, Inc.

Cox News Service

May 6, 2002 Monday

SECTION: Lifestyle

LENGTH: 386 words

HEADLINE: Audiogalaxy.com has a world of music

DATELINE: ATLANTA

BODY:

The folks at www.yil.com _ Yahoo's magazine _ recently rated the top sites for downloading music for free. Its top vote went to audiogalaxy.com.

There's plenty of variety. We did a search for TLC and got more than 2,500 hits. A search for Lisa Lopes, the TLC member who died last month in a car wreck in Central America, came up with nearly 300 hits. Search for Lil' Kim, our choice to replace Lopes on TLC, and you'll get more than 2,250 replies. If you wrongly input Little Kim, you still get a couple of hundred.

Yahoo says it might take a while to get used to the quirky software.

EarthLink top dial-up 3rd year running

For the third straight year, EarthLink (www.earthlink.net) has won top honors in CNet's annual review of major dial-up Internet service providers.

CNet (www.cnet.com) noted that Atlanta-based EarthLink "doesn't pester you with ads."

The company also scored points for protecting the privacy of its subscribers. It was the only provider with the courage to turn back publicly the federal government's attempt to install its Carnivore e-mail monitoring system, one of the latest attempts by Big Brother to quietly nose into the private lives of citizens.

EarthLink got the nod over America Online, AT&T WorldNet, MSN and CompuServe.

Tip of the week

Don't mark the e-mail you're sending as urgent unless you're letting the recipient know someone died or something. (Hopefully, you're calling the person if it is that dire of a situation.) Like many of you, we get e-mails with that exclamation point popped on there. Man, do we hate that thing. Have the contents ever been truly pressing? Not in any of the e-mails we've received like the ones we often get from public relations firms. We had one guy repeatedly send us urgent e-mails about an upcoming awards ceremony. Our suggestion: Treat it like spam. If someone sends you an e-mail with that exclamation point, read it last or not at all ... unless it comes from your boss or your mom.

Quote of the week

"Within two years we'll look back on this dial-up period with the same nostalgia we felt about the old days of picking up the phone and asking Mary the operator to connect you."

_ C. MICHAEL ARMSTRONG, chairman and CEO of AT&T, on the move to broadband

Compiled by the staff of The Atlanta Journal-Constitution.

LOAD-DATE: May 7, 2002

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University Wire

April 2, 2002, Tuesday

SECTION: COLUMN

LENGTH: 380 words

HEADLINE: Let the stealing continue!

BYLINE: By Hilton Price, Oklahoma Daily

SOURCE: U. Oklahoma

DATELINE: Norman, Okla.

BODY:

In the months that have passed since the shutdown of the Napster online file-sharing service, it has grown increasingly difficult to steal music over the Internet.

For those looking to fill the void left by Napster, check out www.audiogalaxy.com. The Audiogalaxy service is a music-only file sharing service, which requires two programs to be running at once.

One program is the search engine. It uses a simple search box, and allows users to either find a specific file size, or simply download the most popular selection.

Downloading is handled by the Audiogalaxy Satellite, a program which must be downloaded and installed before any file downloads can take place.

Although Audiogalaxy is perfect for those in search of strictly music, other services raise the online search bar just a little higher. Morpheus and Kazaa are two of the best. First, it's important to note that Morpheus and Kazaa, although extremely useful for music searches, can find so much more than that.

Not only can viewers find new music from Tommy Lee, but they can also download cover art, tour pictures, music videos, software to remix the song and even the dirty movies of Tommy with former wife Pamela Anderson.

Morpheus' ability to find a large amount of content from all categories can be its biggest hindrance. After all, anyone searching simply for a handful of MP3s will be forced to search through lists of videos, pictures, and software as well.

Enter Kazaa. Although this program also hosts tons of content from a variety of categories, its search system makes it easier to dictate what type of content is being looked for.

Of course, this is a good point to mention some legal and ethical issues. First, stealing is wrong. Musicians need money too, so stealing music off the Internet is doing our favorite music-makers a disservice.

Likewise, although computer software is available through these services, in most cases loading this software onto your computer is illegal.

However, once all these legal and ethical issues have been reviewed, the many file-sharing programs on the Internet make for a fine way to waste some time, or simply find out if Tommy Lee sounds as good without the rest of Motley Crue. Happy hunting!

(C) 2002 Oklahoma Daily via U-WIRE

ALL-STATE LEGAL 120-226-0510 EDR11 RECYCLED





Music Search



--- Jump To ---



member login

Message board: Frequently Asked Questions

05/19/02 [free4good](#) - re: Rip a whole cd

anyone know how to rip an entire cd as one file? I'm using MM Jukebox and haven't figured it out yet...it does a good job on the individual songs. tks

05/19/02 [*being](#) - re: Rip a whole cd

just say all and it should record the whole CD

05/19/02 [blueford21](#) - re: Rip a whole cd

I tried MM Jukebox and it didn't work. You can do it quite easily with Audiograbber. When the tracks come up in the program, left click on the last track and get a Properties box. Note the figure in the Last Sector box. Left click on the first track and get the same Properties box. Insert the Last Sector figure from the last track into the first track's last sector box. Uncheck the other tracks and rename the first track something like Entire CD, etc. Hit Grab. You will get the entire CD as one file.

05/19/02 [Pirre](#) - re: Rip a whole cd

It works in MM as well....put (in recording settings) the recording mode to analog and the option automatic detect gap's to of....but you are going to loose quality...:(

05/19/02 [9dannbrian9](#) - re: Rip a whole cd

use cdex and select rip partial file (third icon on the right) it will do the whole cd in one file with one click.

05/19/02 [free4good](#) - re: Rip a whole cd

cool... I'll have to download those other programs and play around with them! thanks for the help!

05/19/02 [billycullie](#) - re: Rip a whole cd

I've used MM and managed to rip CD but can't get it into my shared directory. Can anyone help? Have tried everything I can think off including restarting my satellite.

05/20/02 [free4good](#) - re: Rip a whole cd

hey, just to let you guys know...I downloaded cdex and ripped a whole cd...first time i did it, i didn't check the settings and created a 500+ meg wave file...only have 256 meg ram, so it freaked out my system...lol. Re-did it in mp3 and it worked beautifully...although I thought a bit slow..took about 40 min. Anyway, I'm happy - tks, everyone! (btw, the cd i ripped is Paul McCartney's Flaming Pie and I'll leave it in my shared folder under mccartney for a while in case anyones's interested) chow!

05/20/02 **blueford21** - re: Rip a whole cd

Conversely, If you download an entire CD as one track, you can use Nero Burn to create individual tracks. You drag and drop the track, right click to get audio track info, and hit the index, limit, split tab and an oscilloscope appears. You can use this to shorten or lengthen the size of a track. It takes a while but is worth it if you like to get the individual songs for randomizing.

05/20/02 **free4good** - re: Rip a whole cd

hey, very cool, blueford..I have nero burn, too...it came with my cd burner, although with no documentation. I will give it a shot...tks!

05/20/02 **blueford21** - re: Rip a whole cd

Free4good: I forgot to mention that you need to drag and drop the "whole" file for each track created. Go to Freedb.org to get the times of the individual tracks.



Log In Before Posting

You must be logged-in before you can post a message to this thread.

Account login

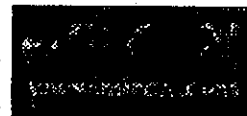
Username

Password

Log In

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Music Search

39

--- Jump To ---

39

member login

Message board: I'm looking for ...

05/13/02 **Durrson** - Prince / Symbol / The Artist / T.A.F

I'm looking for the track "Beautiful" by the above artist. Not to be confused with "The Most Beautiful Girl In The World". The song Beautiful comes from the 1994 Bellmark EP "The Beautiful Experience" ~*~ Thanks for any help you can offer...

05/14/02 **Durrson** - re: Prince / Symbol / The Artist

Ok, cancel the above. I've managed to get this with the help of a friend. Can anyone help me find the album "COME" by Prince? It's one of those difficult ones to find on AG... Thanks in advance?

05/15/02 **Durrson** - re: Prince / Symbol / The Artist

Anyone?

05/21/02 **Durrson** - re: Prince / Symbol / The Artist

Yet another bump, this is my last one now..



Log In Before Posting

You must be logged-in before you can post a message to this thread.

Account login

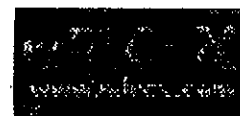
Username

Password

Login

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<http://www.audiogalaxy.com/pages/thread.php?&t=20678607>

05/21/2002

** TOTAL PAGE.05 **

05/22/02 WED 11:52 [TX/RX NO 9973]


welcome blue995800
user home | satellite

Group: • ENGLISH •

[TOP GROUPS](#) | [ALL GROUPS](#) | [GROUPS BY STYLE](#) | [SEARCH FOR GROUP NAME](#)

HOW GROUP • ANTI SEARCH PROHIBITED • IS WORKING

Only accounts older than 1 month will be accepted. If you're an older member of Audiogalaxy, just tell us name of your older account and post it into application message. If you are new to Audiogalaxy we would recommend you to join groups: Newbies Help Group(owner: Rich_9999) or Learners (owner: nemesis6969). Then you can ask all about Audiogalaxy & all about groups. Group • ANTI SEARCH PROHIBITED • and all language related sub-groups are meant to be a service to queue blocked songs for you. Anyone can request any blocked songs. You must search Audiogalaxy yourself. Feel free to use our group message board to ask people about rare songs. This means songs not available here on Audiogalaxy. And for General Discussion of course. Please keep or advertising low. Use personal Notes to chat only with one user. Let's share what we have.

GENERAL SECURITY INFO

ABOUT SPAM: Spam is sending of one or more unrequested songs. If you do that, usually you'll be removed very quickly. That's nothing personal, just for our security. No further discussions about reason of your spam. You are allowed to come back after 1 month. If your message board has no spam reports, you'll be accepted again for a second chance. If you spam again you'll be removed forever. **ABOUT COOKIES:** Your AG password is stored into a cookie on your harddisk(Folders: Cookie Temporary Internet Files). Hackers will try to scan your system for it. To protect yourself it's strongly recommend surfing only on Audiogalaxy website, without any visits of other websites simultaneously(i.e. ICQ, mIRC, Morphex, Kazaa, etc...). If you want to visit another website, logout first from AG and remove all cookies from your harddisk. That's much safer. **ABOUT E-MAIL:** This is also a preferred gate to hack your computer. Users showing e-mail address on their profile, will be denied. Please remove your e-mail before you apply to join this group. **ABOUT PASSWORDS:** Easy passwords are another security problem here on Audiogalaxy. That's why AG made a new Account feature, active since 13. February 2002. If your account was created before, we would recommend you to validate your account. Use --Jump To-- on top of each AG page, choose Account & click link for Email Validation.

HOW TO USE OUR REQUEST BOARD

See Group Members of group • ANTI SEARCH PROHIBITED • for member • Requests •(operator) & click on that name. How to get song numbers? WITH INTERNET EXPLORER: Point your mouse cursor over the X icon of a blocked song. Your browser will show a URL on status bar, ending i.e. ...galaxy.com/list/song.php?&g=98765432 Song ID(SID) is g=number. You can copy & paste this number easy. Do a right click over the X icon and choose properties on appearing pop-up menu. Then copy only SID of URL and paste it into your request message. Limit of requests is 20 songs/day. If you post more songs, they will be ignored. If you request more than one song post them like following example: 45326 7841225 87469


VERY IMPORTANT



You must be a member of • ANTI SEARCH PROHIBITED • before you're allowed to join this sub-group. Password to join is: diamond. Now you can continue with Step 3 on Self Description profile ASP. Agreement. Thank you very much for reading.

~X ASP Agreement owner
 X halper operator
 X I_Need_It operator
 X JServ22 operator
 X nightstalker014 operator
 X OWNERSPROTECTION operator
 X paulkellysr operator

Join Group

To join this group, click **here** to apply. If an operator approves you, you will automatically be added to this group.

audiogalaxy gold welcome blue092800 user home | satellite 

Music Search  --- Jump To --- 

Group: *FULL ALBUMZ AND NEW SHIT*

TOP GROUPS | ALL GROUPS | GROUPS BY STYLE | SEARCH FOR GROUP NAME

Rock, Hard Rock, Pop, Hip Hop, Gangsta Rap, R&B, Contemporary R&B

502183 15025				
859183				
808502852 10259983 8 0854 18				
508 85902852 1028834 10285025768				
5 15025 183 531 1850254				
1028502850283 1850251 85928 825 181025				
85 1850283 102802850283 85928392 80831				
15028301 8831 2592 1 5088502831 82802839 KEOLAI				
85928 801 15921 25978501 80851 8585				
10281 708 80283 881 195131 8258				
102110281 85592 10207 595 185181				
10281 1531 1028 808891 85811				
884 8590283928				
828 8892 1850181 8081 7853				
1855222222 18 5088502850 851181 18501				
17859 8381 18				
8590283928592 1505 8011028 1531				
855 102 85902279252 1859 801859				
181 1881 159				
8851 831 8538 859281 181				
502 825 131 82581 18859				
501 1851 8592				
181 5095 10281 831				
128 808301 81 222 1805 88				
8581 1899 185025				
50 22 22				
1835 18592 15				
22 21 *FULL ALBU				
AND NEW SHIT*				
RULEZ ... RULEZ ... RULEZ ... RULEZ ...				
1] DO NOT SEND UNREQUESTED SONGS (spamming)				
2] DO NOT SPAM (sending unrequested songs)				
3] DO NOT SEND SHIT TO ANYONE IF THEY DIDNT AS				
FOR IT 4] DO NOT ADVERTISE (don't even think of asking)				
5] Anyone bragging about having a CD that aint even out				
WILL BE REMOVED(if its available WE WILL HAVE IT) 6] Anyone bitching about spam/spammers will be remo				
(WE DONT LIKE THE SPAM JUST AS MUCH AS YOU) delete the spam and get on with life. In most cases the				
spammer will be removed as soon as it happens. WE CANT PREDICT WHO WILL SPAM and we don't let KNOW				
SPAMMERS IN				
FANS Temp Gold ... 2PAC -				
(waiting area for NEW double CD) FANS Temp ICE ... 50Cent -				
Guess Whos Back FANS Temp #1 X-Zibit - Man vs				
Machine (waiting area) FANS Temp #0 ... COO COO C				
Still Walking				

5:24:59 PM 5/21/02

2	You can request FULL ALBUMS but please post a tracklisting on -REQUESTOR-
3	NO SPAMMING - sending unrequested songs to the group - NO EXCEPTIONS
4	NO ADVERTISING of other groups
5	5 weeks in at least 2 groups >100 no bad history -
6	NO WHINING 'bout SPAM on the group board. You'll share the SPAMMERS fate
7	NO SWEARING on the group board

~RAY~ owner

~REQUESTOR~ operator

~* domerock operator

~* ImJuctALITipsy operator

~* mickyspectrum operator

~* PikerUK operator

~* raystevieggrand operator

~* stalkercrexy operator

~* xzzyzy~ operator

~* ~*PolyNesianFlo... operator

~* @_CHINAMAN @_ operator

~* 1bulldog

~* 2mixpit

~* Arizona68

~* Bas6611

~* BerlinEagle

~* Blue_Opium

~* Cards011

~* DJ--TOLIS

~* Darrochy

~* Dead Guy

~* Losplanetas

~* Masias

~* Mike-Blogie

~* Misak210

~* MissAVuk

~* Mojave666

~* Nckopol

~* STATICX382

~* Stockholm-Jackp...

~* TheUnOne

~* alicloud

~* amarula

~* antoniomontovia

~* bmwomyn

~* bramaputra

~* brother54

~* carolus

~* cicciotata

~* coolagarry1

~* chacke

~* clerci

~* drumblum

~* ellade7

~* freshiazure

~* gominacorection

Join Group

To join this group, click [here](#) to apply. If an operator approves you, you will automatically be added to this group.

Group: sPaNkin__New__e3c

Film Scores, Classical, Ska, Reggae, Gangsta Rap, Bass, Hop, Turntablist, Independent Hip Hop, Rock, Modern Rock, Heavy Metal, Hard Rock, Classic Rock.

This image shows a page of a musical score manuscript. It consists of ten staves, each beginning with a treble clef. The notation is highly rhythmic, characterized by frequent beaming of sixteenth and thirty-second notes. The handwriting is consistent throughout, and the paper appears aged with some visible texture. The manuscript is oriented slightly to the right.