

1 DAVID A. STEINBERG (SBN 130593)
das@msk.com
2 AARON M. WAIS (SBN 250671)
amw@msk.com
3 BRADLEY J. MULLINS (SBN 274219)
bym@msk.com
4 MITCHELL SILBERBERG & KNUPP LLP
11377 West Olympic Boulevard
5 Los Angeles, CA 90064-1683
Telephone: (310) 312-2000
6 Facsimile: (310) 312-3100

7 Attorneys for Plaintiffs
UMG Recordings, Inc.; Roc-A-Fella Records,
8 LLC; Capitol Records, LLC; Universal Music
Corp.; Songs of Universal, Inc.; PolyGram
9 Publishing, Inc.; Universal Music – MGB NA
LLC; and Universal Music – Z Tunes LLC
10

11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA
13

14 UMG Recordings, Inc.; Roc-A-Fella
Records, LLC; Capitol Records, LLC;
15 Universal Music Corp.; Songs of
Universal, Inc.; PolyGram Publishing,
16 Inc.; Universal Music – MGB NA LLC;
and Universal Music – Z Tunes LLC

17 Plaintiffs,

18 v.

19 iBus Media Limited, and DOES 1
20 through 10, inclusive,

21 Defendants.
22

CASE NO. 2:18-cv-9709

**COMPLAINT FOR COPYRIGHT
INFRINGEMENT; VIOLATION
OF CALIFORNIA CIVIL CODE
§ 980(2); VIOLATION OF
CALIFORNIA BUSINESS AND
PROFESSIONS CODE § 17200;
AND COMMON LAW UNFAIR
COMPETITION**

Demand For Jury Trial

23 Plaintiffs UMG Recordings, Inc.; Roc-A-Fella Records, LLC; Capitol
24 Records, LLC; Universal Music Corp.; Songs of Universal, Inc.; PolyGram
25 Publishing, Inc.; Universal Music – MGB NA LLC; and Universal Music – Z
26 Tunes LLC (collectively, “Plaintiffs”), by their undersigned attorneys, for their
27 Complaint against Defendant iBus Media Limited (“iBus Media” or “Defendant”),
28 aver as follows:

PRELIMINARY STATEMENT

1
2 1. Plaintiffs are some of the world’s leading record labels and music
3 publishers, and are engaged in the business of acquiring, administering, licensing,
4 and otherwise exploiting a catalog of copyrights in and to sound recordings and
5 musical compositions, owned in whole or in part by Plaintiffs. Plaintiffs’ catalog
6 of copyrighted musical works is extremely valuable and encompasses works
7 composed or famously performed by a wide array of legendary songwriters and
8 artists, including both contemporary hits and influential standards.

9 2. iBus Media is a global content creation and technology company that,
10 among other things, owns and operates the website located at
11 www.pokernews.com (“PokerNews”). PokerNews is, in turn, the self-proclaimed
12 “largest poker media site in the world.” Among the content made available by
13 iBus Media on PokerNews, and through other forums, are hundreds of podcasts
14 that intentionally incorporate significant portions of Plaintiffs’ copyrighted musical
15 works.

16 3. iBus Media does not have any license or other authorization from
17 Plaintiffs to reproduce, distribute, adapt or publicly perform in the United States
18 any of Plaintiffs’ copyrighted musical works. Accordingly, iBus Media is liable
19 for its infringement of Plaintiffs’ copyright interests, either because it has directly
20 engaged in infringing activities or because it is secondarily liable for infringing
21 activities undertaken by others.

22 4. iBus Media surely is aware that its conduct constitutes copyright
23 infringement, given that it is a sophisticated global operation that runs what it
24 claims to be the largest poker website in the world. Moreover, iBus Media was
25 notified that it was infringing Plaintiffs’ copyrighted works nearly three years ago.
26 Nevertheless, iBus Media continues to infringe. iBus Media’s infringement is
27 therefore willful and deliberate.

1 5. Its conduct has caused and continues to cause substantial, manifest,
2 and irreparable harm to Plaintiffs, while enriching iBus Media at Plaintiffs'
3 expense and to the detriment of the copyrighted musical works owned and/or
4 controlled by Plaintiffs. By this lawsuit, Plaintiffs seek to bring iBus Media's
5 conduct to a stop and to obtain compensation for the harm iBus Media has caused
6 and continues to cause to Plaintiffs.

7 **JURISDICTION AND VENUE**

8 6. This is a civil action seeking damages and injunctive relief for
9 copyright infringement under the Copyright Act, 17 U.S.C. § 101 *et seq.*

10 7. This Court has jurisdiction over this action pursuant to 17
11 U.S.C. §§ 101 *et seq.*, 28 U.S.C. §§ 1331, 1338, and 1367.

12 8. As further detailed below, this Court has personal jurisdiction over
13 Defendant because, among other things, Defendant has engaged and is engaged in
14 tortious conduct within the State of California and in this District, including by
15 reproducing, distributing, preparing derivative works based upon, and publicly
16 performing Plaintiffs' copyrighted works within the State of California.
17 Additionally, among other things, (a) Defendant has maintained a business
18 presence in the State of California and is doing or has been doing business
19 continuously in the State of California and this District, (b) a substantial part of the
20 wrongful acts committed by Defendant have occurred in interstate commerce, in
21 the State of California, and in the Central District of California, and (c)
22 Defendant's conduct causes injury to, and is directed at, Plaintiffs and their
23 intellectual property within the State of California.

24 9. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(b)
25 and (c). Defendant conducts business in this District and, upon information and
26 belief, a substantial part of the events giving rise to Plaintiffs' claims occurred in
27 this District. Plaintiffs have their principal places of business in this District and
28 have been injured in this District as a result of Defendant's infringing conduct.

THE PARTIES

10. Plaintiff UMG Recordings, Inc. (“UMG Recordings”) is a corporation duly organized and existing under the laws of the State of Delaware, with its principal place of business within the County of Los Angeles, California.

11. Plaintiff Roc-A-Fella Records, LLC (“Roc-A-Fella”) is a limited liability company duly organized and existing under the laws of the State of New York, with its principal place of business within the County of Los Angeles, California.

12. Plaintiff Capitol Records, LLC (“Capitol”) is a limited liability company duly organized and existing under the laws of the State of Delaware, with its principal place of business within the County of Los Angeles, California.

13. Plaintiffs UMG Recordings, Roc-A-Fella, and Capitol collectively are referred to herein as the “Record Company Plaintiffs.”

14. The Record Company Plaintiffs are engaged in the business of producing sound recordings and distributing, selling, and/or licensing the reproduction, distribution, sale, preparation of derivative works based upon, and performance of their sound recordings in phonorecords (as defined in 17 U.S.C. § 101), in audiovisual works, and for streaming (i.e., performing) and downloading over the Internet and through other mediums. The Record Company Plaintiffs invest substantial money, time, effort, and creative talent in discovering and developing recording artists, and in creating, advertising, promoting, selling, and licensing sound recordings embodying the performances of their exclusive recording artists and their unique and valuable sound recordings.

15. The Record Company Plaintiffs own copyrights and/or exclusive rights in and to their sound recordings including many of the most popular sound recordings in the world, including by way of example, the recordings identified on Schedule A hereto, incorporated herein by reference. The Record Company Plaintiffs have obtained or applied for certificates of copyright registration in each

1 of the recordings, including but not limited to those identified on Schedule A. The
2 Record Company Plaintiffs also own exclusive rights in certain sound recordings,
3 including the sound recordings listed on Schedule B, for which they owns rights
4 under state law (together with the recordings listed in Schedule A, the
5 “Recordings”). As the owner of copyrights in the Recordings, the Record
6 Company Plaintiffs possess the exclusive rights, among other things, to reproduce
7 the Recordings in copies or phonorecords, to prepare derivative works based upon
8 the Recordings, to distribute copies or phonorecords of the Recordings to the
9 public, to perform the Recordings publicly by means of a digital audio
10 transmission and to license these exclusive rights, including over the Internet.

11 16. Plaintiff Universal Music Corp. (“Universal Music”) is a corporation
12 duly organized and existing under the laws of the State of Delaware, with its
13 principal place of business within the County of Los Angeles, California.

14 17. Plaintiff Songs of Universal, Inc. (“Songs of Universal”) is a
15 corporation duly organized and existing under the laws of the State of California,
16 with its principal place of business within the County of Los Angeles, California.

17 18. Plaintiff PolyGram Publishing, Inc. (“PolyGram”) is a corporation
18 duly organized and existing under the laws of the State of Delaware, with its
19 principal place of business within the County of Los Angeles, California.

20 19. Plaintiff Universal Music – MGB NA LLC (“MGB”) is a limited
21 liability company duly organized and existing under the laws of the State of
22 California, with its principal place of business within the County of Los Angeles,
23 California.

24 20. Plaintiff Universal Music – Z Tunes LLC (“Z Tunes”) is a limited
25 liability company duly organized and existing under the laws of the State of New
26 York, with its principal place of business within the County of Los Angeles,
27 California.

1 21. Plaintiffs Universal Music, Songs of Universal, PolyGram, MGB, and
2 Z Tunes collectively are referred to herein as the “Music Publisher Plaintiffs.”

3 22. The Music Publisher Plaintiffs are music publishers, engaged in the
4 business of acquiring, owning, publishing, administering, licensing, and otherwise
5 exploiting copyrights in musical compositions. Plaintiffs invest substantial money,
6 time, effort, and creative talent to acquire, administer, publish, license, and
7 otherwise exploit such copyrights, on their own behalves and on behalf of
8 songwriters and other music publishers with whom they have contractual
9 relationships.

10 23. The Music Publisher Plaintiffs own or administer (in whole or in part)
11 copyrights and/or exclusive rights in and to thousands of musical compositions,
12 including by way of example those compositions identified on Schedule C hereto,
13 incorporated herein by reference (the “Musical Compositions”). The Music
14 Publisher Plaintiffs have obtained or have applied for certificates of copyright
15 registrations issued by the Copyright Office in each of the Musical Compositions
16 identified on Schedule C. As the owners or administrators of copyrights (in whole
17 or in part) in these Musical Compositions, the Music Publisher Plaintiffs possess
18 the exclusive rights, among other things, to reproduce the Musical Compositions in
19 copies or phonorecords, to prepare derivative works based upon the Musical
20 Compositions, to distribute copies or phonorecords of the Musical Compositions to
21 the public, and to perform the Musical Compositions publicly.

22 24. Defendant iBus Media is company registered in the Isle of Man that
23 purports to maintain a “truly global presence” with at least five global offices,
24 including one in California. Plaintiffs are informed and believe, and on that basis
25 aver, that iBus Media is a content provider and website operator and is in the
26 business of producing, distributing, publicly performing, selling, licensing, and
27 otherwise exploiting audio and visual content. Among other things, iBus Media, or
28 its affiliated group of companies, owns and operates the website located at

1 www.pokernews.com, which is directed at and accessible throughout the United
2 States and in the State of California.

3 25. The true names and capacities, whether individual, corporate,
4 associate, or otherwise, of defendants sued herein as Does 1 through 10, inclusive,
5 are unknown to Plaintiffs, which sues said defendants by such fictitious names (the
6 “Doe Defendants”). If necessary, Plaintiffs will seek leave to amend this
7 Complaint to state their true names and capacities. Plaintiffs are informed and
8 believe, and on that basis aver, that the Doe Defendants are liable to Plaintiffs as a
9 result of their participation in all or some of the acts hereinafter set forth (all of the
10 Defendants, including the Doe Defendants, collectively are referred to as
11 “Defendants”).

12 26. Plaintiffs are informed and believe, and on that basis aver, that at all
13 times mentioned in this Complaint, each of the Defendants was the agent of each
14 of the other Defendants and, in doing the things averred in this Complaint, was
15 acting within the course and scope of such agency.

16 **FACTS APPLICABLE TO ALL CLAIMS**

17 27. iBus Media is the owner and operator of the website
18 www.pokernews.com (“PokerNews”). iBus Media describes PokerNews as “the
19 largest poker media site in the world” and “the world’s leading poker website.”
20 According to iBus Media, PokerNews is “considered to be the most complete
21 poker resource available on the internet.” PokerNews contains a great deal of
22 content, including news, videos, strategy guides, live reporting, and podcasts,
23 largely focused on the poker industry. As claimed on PokerNews itself, “visitors
24 will find a daily dose of articles with the latest poker news, live reporting from
25 tournaments, exclusive videos, podcasts and so much more.”

26 28. Pokernews contains a great deal of material that was either written or
27 otherwise prepared in the United States and California, or that is directly targeted
28 towards audiences in the United States and California. This material includes

1 coverage of poker events in California, videos filmed at events in California,
2 podcasts created or recorded in California, and articles regarding the status of
3 legalization of poker in California.

4 29. iBus Media also employs or has employed individuals in the United
5 States and California that support the operation of and creation of content for
6 Pokernews. These employees include an editor for Pokernews that is based in Los
7 Angeles, California, and multiple employees in Nevada and other locations
8 throughout the United States, including the “Head of Video and Podcasting.” iBus
9 Media also maintained an office in San Diego during the period of infringement as
10 alleged herein. iBus Media has also applied for and obtained multiple trademark
11 registrations related to PokerNews in the United States.

12 30. In addition to the website, iBus Media also owns, operates and
13 distributes a mobile application called “PokerNews.Com” (the “PokerNews App”).
14 The PokerNews App contains much of the same content available on PokerNews,
15 including the podcasts. The PokerNews App is available for download both
16 through the iTunes App Store, and the Google Play app store.

17 31. A large portion of the content available through PokerNews and the
18 PokerNews App consists of hundreds of podcasts discussing various issues relating
19 to poker.

20 32. In addition to being made available for streaming through PokerNews
21 and the PokerNews App, these podcasts are also made available to audiences in the
22 United States and California for streaming and/or download by iBus Media
23 through audioBoom, iTunes, Spotify, Google Play, and Stitcher.

24 33. In numerous of the podcasts, iBus Media incorporated significant
25 portions of Plaintiffs’ copyrighted works (the “Infringing Podcasts”). In each of
26 the Infringing Podcasts, Plaintiffs’ copyrighted works are prominently featured and
27 undoubtedly used with the intention of making the podcasts more appealing to
28 listeners.

1 34. Upon information and belief, iBus Media profits from the Infringing
2 Podcasts by, among other things, directly or indirectly pairing the Infringing
3 Podcasts with advertising or otherwise using the Infringing Podcasts to draw
4 audiences to its other profit-making enterprises.

5 35. By incorporating Plaintiffs' copyrighted works into the Infringing
6 Podcasts, and then making those Infringing Podcasts available to the public for
7 streaming and/or download, all without any license or authorization from
8 Plaintiffs, iBus Media is infringing Plaintiffs' exclusive rights to reproduce,
9 prepare derivative works based upon, distribute, and publicly perform the works
10 listed in Schedules A, B, and C incorporated herewith. This infringement includes,
11 but is not limited to, (i) adapting Plaintiffs' copyrighted works to create new,
12 unauthorized derivative works (i.e., the Infringing Podcasts); (ii) uploading the
13 Infringing Podcasts to its own computer servers and the computer servers of third-
14 party hosting services; and (iii) transmitting the Infringing Podcasts to consumers
15 of iBus Media's content via streaming digital public performance. Schedule D to
16 this Complaint, which is also incorporated herein by reference, is a representative
17 sample of the Infringing Podcasts, and also identifies the copyright work infringed
18 in each such Infringing Podcast.

19 36. While Schedule D contains hundreds of examples of infringements,
20 Plaintiffs are continuing their investigation into the scope of iBus Media's
21 infringement. Plaintiffs are informed and believe, and on that basis aver, that
22 further investigation will reveal many more sound recordings and musical
23 compositions owned and/or controlled by Plaintiffs, in whole or in part, that are
24 being unlawfully exploited by iBus Media. Plaintiffs expressly reserve the right to
25 amend this Complaint to assert additional claims for infringement of Plaintiffs'
26 copyrighted works as it uncovers such infringement during the course of discovery
27 in this action.

1 43. By the acts set forth above, Defendants have infringed the Record
2 Company Plaintiffs' copyrights in the Recordings, including by reproducing,
3 distributing, adapting, and digitally publicly performing the Recordings without
4 authorization, in violation of the Copyright Act, 17 U.S.C. §§ 106 and 501.

5 44. Each such infringement by Defendants of the Recordings constitutes a
6 separate and distinct act of infringement.

7 45. Defendants' acts of infringement are willful, in disregard of and with
8 indifference to the rights of the Record Company Plaintiffs.

9 46. As a direct and proximate result of the infringements by Defendants,
10 the Record Company Plaintiffs are entitled to damages and to Defendants' profits
11 in amounts to be proven at trial, and which are not currently ascertainable.

12 Alternatively, the Record Company Plaintiffs are entitled to maximum statutory
13 damages of \$150,000 for each copyright infringed, or in such other amount as may
14 be proper under 17 U.S.C. § 504(c).

15 47. The Record Company Plaintiffs further are entitled to their attorneys'
16 fees and full costs pursuant to 17 U.S.C. § 505.

17 48. As a result of Defendants' acts and conduct, the Record Company
18 Plaintiffs have sustained and will continue to sustain substantial, immediate, and
19 irreparable injury, for which there is no adequate remedy at law. The Record
20 Company Plaintiffs are informed and believe, and on that basis aver, that unless
21 enjoined and restrained by this Court, Defendants will continue to infringe the
22 Record Company Plaintiffs' rights in the Recordings. The Record Company
23 Plaintiffs are entitled to temporary, preliminary, and permanent injunctive relief to
24 restrain and enjoin Defendants' continuing infringing conduct.

COUNT II

COPYRIGHT INFRINGEMENT

[By The Music Publisher Plaintiffs Against Defendants]

49. Plaintiffs incorporate by this reference each and every averment contained in paragraphs 1 through 41, inclusive.

50. By the acts set forth above, Defendants have infringed the Music Publisher Plaintiffs' copyrights in the Musical Compositions by reproducing, adapting, distributing, and publicly performing the Musical Compositions without authorization, in violation of the Copyright Act, 17 U.S.C. §§ 106 and 501.

51. Each such infringement by Defendants of the Musical Compositions constitutes a separate and distinct act of infringement.

52. Defendants' acts of infringement are willful, in disregard of and with indifference to the rights of the Music Publisher Plaintiffs.

53. As a direct and proximate result of the infringements by Defendants, the Music Publisher Plaintiffs are entitled to damages and to Defendants' profits in amounts to be proven at trial, and which are not currently ascertainable.

Alternatively, the Music Publisher Plaintiffs are entitled to maximum statutory damages of \$150,000 for each copyright infringed, or in such other amount as may be proper under 17 U.S.C. § 504(c).

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

55. As a result of Defendants' acts and conduct, the Music Publisher Plaintiffs have sustained and will continue to sustain substantial, immediate, and irreparable injury, for which there is no adequate remedy at law. The Music Publisher Plaintiffs are informed and believe, and on that basis aver, that unless enjoined and restrained by this Court, Defendants will continue to infringe the Music Publisher Plaintiffs' rights in the Musical Compositions. The Music

1 Publisher Plaintiffs are entitled to temporary, preliminary, and permanent
2 injunctive relief to restrain and enjoin Defendants' continuing infringing conduct.

3 **COUNT III**

4 **VIOLATION OF CALIFORNIA CIVIL CODE § 980(2)**

5 **[By The Record Company Plaintiffs Against Defendants]**

6 56. Plaintiffs incorporate by this reference each and every averment
7 contained in paragraphs 1 through 41, inclusive.

8 57. The Record Company Plaintiffs own exclusive ownership interests
9 pursuant to California Civil Code § 980(a)(2) and under the common law in and to
10 the sound recordings identified in the representative list attached hereto as
11 Schedule B, among many other such sound recordings that the Recording
12 Company Plaintiffs own and which they are informed and believe, and on that
13 basis aver, that Defendants have infringed, to be identified in discovery.

14 58. As set forth in more detail above, Defendants have, without
15 permission, reproduced and distributed the sound recordings or portions thereof in
16 podcasts as reflected on Schedule D. Additionally, the Record Company Plaintiffs
17 are informed and believe, and on that basis aver, that Defendants have, without
18 permission, reproduced, distributed, and adapted a substantial number of additional
19 sound recordings protected under state law and owned by the Record Company
20 Plaintiffs.

21 59. As a direct and proximate result of Defendants' conduct in violation
22 of the Record Company Plaintiffs' exclusive ownership interests in and to their
23 sound recordings owned pursuant to state law, Defendants have received proceeds
24 and the Record Company Plaintiffs have been damaged in an amount to be proved
25 at trial.

26 60. Defendants' conduct is causing and, unless enjoined and restrained by
27 this Court, will continue to cause the Record Company Plaintiffs great and
28 irreparable injury that cannot fully be compensated or measured in money. The

1 Record Company Plaintiffs have no adequate remedy at law. The Record
2 Company Plaintiffs are entitled to preliminary and permanent injunctions
3 prohibiting further infringements of its exclusive rights.

4 61. Defendants are guilty of oppression, fraud and/or malice and the
5 Record Company Plaintiffs, in addition to their actual damages are, by reason
6 thereof, entitled to recover exemplary and punitive damages against Defendants.

7 **COUNT IV**

8 **VIOLATION OF CALIFORNIA BUSINESS AND PROFESSIONS**
9 **CODE § 17200 AND COMMON LAW UNFAIR COMPETITION**

10 **[By The Record Company Plaintiffs Against Defendants]**

11 62. Plaintiffs incorporate by this reference each and every averment
12 contained in paragraphs 1 through 41, inclusive.

13 63. The foregoing acts and conduct of Defendants constitute
14 misappropriation, conversion, and invasion of the Record Company Plaintiffs'
15 property rights in and to the sound recordings that they own pursuant to state law
16 and which Defendants have infringed, to be identified in discovery, in addition to
17 the representative sample reflected in Schedule B hereto. The foregoing acts and
18 conduct of Defendants constitute unfair competition under California Business and
19 Professions Code § 17200 and under the common law. If necessary, the Record
20 Company Plaintiffs will amend this Complaint to add additional claims under state
21 law once the specific identities of all of the sound recordings infringed by
22 Defendants are determined, or, alternatively, will provide such information
23 pursuant to Fed. R. Civ. P. 26 and/or in discovery.

24 64. As a direct and proximate result of Defendants' conduct, the Record
25 Company Plaintiffs are entitled to recover all proceeds and other compensation
26 received or to be received by Defendants arising from their infringements of the
27 Record Company Plaintiffs' sound recordings owned pursuant to state law. The

1 Record Company Plaintiffs requests that the Court order Defendants to render an
2 accounting to ascertain the amount of such profits and compensation.

3 65. As a direct and proximate result of Defendants' unfair competition,
4 the Record Company Plaintiffs have been damaged and Defendants have been
5 unjustly enriched, in an amount that shall be proved at trial for which damages,
6 restitution, and/or disgorgement is appropriate. Such damages, restitution, and/or
7 disgorgement should include a declaration by this Court that Defendants are
8 constructive trustees for the benefit of the Record Company Plaintiffs and an order
9 that Defendants convey to the Record Company Plaintiffs all the gross receipts
10 received or to be received that are attributable to infringement of the Record
11 Company Plaintiffs' sound recordings owned pursuant to state law.

12 66. Defendants' conduct is causing and, unless enjoined and restrained by
13 this Court, will continue to cause the Record Company Plaintiffs' great and
14 irreparable injury that cannot fully be compensated or measured in money. The
15 Record Company Plaintiffs have no adequate remedy at law. The Record
16 Company Plaintiffs are entitled to preliminary and permanent injunctions
17 prohibiting further infringements of its exclusive rights.

18 67. Defendants are guilty of oppression, fraud and/or malice and the
19 Record Company Plaintiffs, in addition to their actual damages are, by reason
20 thereof, entitled to recover exemplary and punitive damages against Defendants.

1 WHEREFORE, Plaintiffs pray for judgment against Defendants, and each of
2 them, jointly and severally, as follows:

3 1. For a preliminary and permanent injunction enjoining and restraining
4 Defendants and their respective agents, servants, directors, officers, principals,
5 employees, representatives, subsidiaries and affiliated companies, successors,
6 assigns, and those acting in concert with them or at their direction from directly or
7 indirectly infringing in any manner any right in any and all copyrighted works (or
8 portions thereof), whether now in existence or later created, in which any Plaintiff
9 (including its parents, subsidiaries, affiliates, or distributed labels) owns or controls
10 an exclusive right under Section 106 of the United States Copyright Act (17 U.S.C.
11 § 106) or state law, including without limitation by directly or indirectly copying,
12 reproducing, downloading, distributing, communicating to the public, uploading,
13 linking to, transmitting, publicly performing, or otherwise exploiting in any
14 manner any of Plaintiffs' Recordings or Musical Compositions, including but not
15 limited to those set forth in Schedules A, B and C to the Complaint; and

16 2. On Counts I and II, for:

17 (a) Defendants' profits and damages in such amount as may be
18 determined; alternatively, for maximum statutory damages in the amount of
19 \$150,000 with respect to each copyrighted work infringed, or for such other
20 amount as may be proper pursuant to 17 U.S.C. § 504(c); and

21 (b) Plaintiffs' attorneys' fees and full costs; and

22 3. On Counts III and IV, for an accounting, the imposition of a
23 constructive trust, restitution of Defendants' unlawful proceeds, and damages
24 according to proof;

25 3. On Counts III and IV, for punitive and exemplary damages in such
26 amount as may be awarded at trial;

27 4. For prejudgment interest according to law; and

1 5. For such other and further relief as the Court may deem just and
2 proper.

3
4 DATED: November 16, 2018 Mitchell Silberberg & Knupp LLP

5
6 By: /s/ Aaron M. Wais
7 David A. Steinberg
8 Aaron M. Wais
9 Bradley J. Mullinw
10 Attorneys for Plaintiffs
11 UMG Recordings, Inc.; Roc-A-Fella
12 Records, LLC; Capitol Records, LLC;
13 Universal Music Corp.; Songs of
14 Universal, Inc.; PolyGram Publishing,
15 Inc.; Universal Music – MGB NA LLC;
16 and Universal Music – Z Tunes LLC
17
18
19
20
21
22
23
24
25
26
27

JURY DEMAND

Plaintiffs UMG Recordings, Inc.; Roc-A-Fella Records, LLC; Capitol Records, LLC; Universal Music Corp.; Songs of Universal, Inc.; PolyGram Publishing, Inc.; Universal Music – MGB NA LLC; and Universal Music – Z Tunes LLC hereby demand a trial by jury on all matters and issues so triable.

DATED: November 16, 2018

MITCHELL SILBERBERG & KNUPP LLP

By: /s/ Aaron M. Wais

David A. Steinberg
Aaron M. Wais
Bradley J. Mullins
Attorneys for Plaintiffs
UMG Recordings, Inc.; Roc-A-Fella
Records, LLC; Capitol Records, LLC;
Universal Music Corp.; Songs of
Universal, Inc.; PolyGram Publishing,
Inc.; Universal Music – MGB NA LLC;
and Universal Music – Z Tunes LLC

EXHIBIT A

SCHEDULE A

| Title | Artist | Plaintiff | Copyright Registration Number |
|--|---------------------|-----------------------------|--|
| Ain't No Love In The Heart Of The City | Bobby Bland | UMG Recordings, Inc. | N00000016419, RE0000867280 |
| All Of The Lights | Kanye West | Roc-A-Fella Records, LLC | SR0000683430 |
| All Star | Smash Mouth | UMG Recordings, Inc. | SR0000264519 |
| Ba Bump | The Black Eyed Peas | UMG Recordings, Inc. | SR0000378166 |
| Bohemian Like You | The Dandy Warhols | Capitol Records, LLC | SR0000285787 |
| Champion | Kanye West | Roc-A-Fella Records, LLC | SR0000615020 |
| Ch-Check It Out | Beastie Boys | Capitol Records, LLC | SR0000360352 |
| Clap Back | Ja Rule | UMG Recordings, Inc. | SR0000345007 |
| Drop It Like It's Hot | Snoop Dogg | UMG Recordings, Inc. | SR0000362084 |
| Every Little Thing She Does Is Magic | The Police | UMG Recordings, Inc. | SR0000030222 |
| Good Life | Kanye West | Roc-A-Fella Records, LLC | SR0000615020 |
| Good Morning | Kanye West | Roc-A-Fella Records, LLC | SR0000615020 |
| Heard 'Em Say | Kanye West | Roc-A-Fella Records, LLC | SR0000380526 |
| Here For You | Gorgon City | UMG Recordings, Inc. | SR0000746174 |
| Homecoming | Kanye West | Roc-A-Fella Records, LLC | SR0000615020 |
| I Know You Got Soul | Eric B. & Rakim | UMG Recordings, Inc. | SR0000082471 |

SCHEDULE A

| Title | Artist | Plaintiff | Copyright Registration Number |
|--------------|---------------|------------------|--|
|--------------|---------------|------------------|--|

| | | | |
|-----------------|---------------|-----------------------------|-------------------------------|
| Kid Charlemagne | Steely Dan | UMG Recordings, Inc. | N00000032362, RE0000908461 |
| Make Her Say | Kid Cudi | UMG Recordings, Inc. | SR0000641951 |
| Money Maker | Ludacris | UMG Recordings, Inc. | SR0000398765 |
| Mosh | Eminem | UMG Recordings, Inc. | SR0000362156 |
| Outstanding | The Gap Band | UMG Recordings, Inc. | SR0000036081 |
| Paradise City | Guns N` Roses | UMG Recordings, Inc. | SR0000085358 |
| Power | Kanye West | Roc-A-Fella Records, LLC | SR0000683430 |
| So Long Goodbye | Sum 41 | UMG Recordings, Inc. | SR0000609704 |
| The Number Song | DJ Shadow | UMG Recordings, Inc. | SR0000755373 |
| Thought @ Work | The Roots | UMG Recordings, Inc. | SR0000314538 |
| Touch The Sky | Kanye West | Roc-A-Fella Records, LLC | SR0000380526 |
| What They Do | The Roots | UMG Recordings, Inc. | SR0000226398 |
| White Wedding | Billy Idol | Capitol Records, LLC | SR0000039673 |
| Won't Back Down | Eminem | UMG Recordings, Inc. | SR0000653572 |

EXHIBIT B

SCHEDULE B

| Title | Artist | Plaintiff |
|--------------|---------------|------------------|
|--------------|---------------|------------------|

| | | |
|--------------------------|---------------------------|----------------------|
| Baba O'Riley | The Who | UMG Recordings, Inc. |
| Magic Carpet Ride | Steppenwolf, Philip Steir | UMG Recordings, Inc. |
| Pennies From Heaven | Frank Sinatra | Capitol Records, LLC |
| Pretty Little Angel Eyes | Curtis Lee | Capitol Records, LLC |
| Sweet Caroline | Neil Diamond | UMG Recordings, Inc. |

EXHIBIT C

SCHEDULE C

| Title | Artist | Plaintiff | Copyright Registration Number |
|--|--------------------------|---|--|
| Ain't No Love In The Heart Of The City | Bobby Bland | Universal Music Corp. | EU 513011 |
| Kid Charlemagne | Steely Dan | Universal Music Corp. | EU 679291 |
| Clap Back | Ja Rule | Songs of Universal, Inc. | PA 1 245 426 |
| Ch-Check It Out | Beastie Boys | PolyGram Publishing, Inc. | PA 1 268 095 |
| Touch The Sky | Kanye West | Universal Music - MGB NA LLC | PA 1 162 460 |
| Sirius | The Alan Parsons Project | Universal Music - MGB NA LLC | PA-144-129 |
| Friends In Low Places | Garth Brooks | Universal Music - MGB NA LLC | PA-485-587 |
| I Can | Nas | Universal Music - Z Tunes LLC | PA1-262-441 |
| We In Here | DMX | Songs of Universal, Inc., Universal Music Corp. | PA 1-389-846 |
| Good Life | Kanye West | Universal Music - Z Tunes LLC | PA 1 935 936 |
| Superstar | Lupe Fiasco | Universal Music - MGB NA LLC | PA 1-914-364 |
| Magic | B.O.B. | Songs of Universal, Inc. | PA 1 731 007 |

SCHEDULE C

| Title | Artist | Plaintiff | Copyright Registration Number |
|--------------------|-------------------|--|--|
| Show Goes On, The | Lupe Fiasco | Universal Music - MGB NA LLC | PA 1 740 705 |
| All Of The Lights | Kanye West | Universal Music Corp. | PA 1 783 122 |
| Make Her Say | Kid Cudi | Songs of Universal, Inc., Universal Music - MGB NA LLC | PA 1-692-979 |
| Words I Never Said | Lupe Fiasco | Songs of Universal, Inc., Universal Music - MGB NA LLC | PA 1 739 113 |
| Coming Home | Diddy-Dirty Money | Songs of Universal, Inc., Universal Music - MGB NA LLC | PA 1 751 168 |
| Trillionaire | Bun B | Universal Music Corp., Universal Music - MGB NA LLC | PA 1 787 161 |
| Hero | Nas | Songs of Universal, Inc., Universal Music - MGB NA LLC | PA 1-396-112 |
| Milli, A | Lil Wayne | Universal Music - Z Tunes LLC | PA 1 395 759 |
| One Time | Justin Bieber | Songs of Universal, Inc., Universal Music - MGB NA LLC | PA 1 816 046 |
| Star Is Born, A | Jay-Z | Songs of Universal, Inc. | PA 1 920 104 |
| I Want You | Common | Songs of Universal, Inc. | PA 1-629-220 |

SCHEDULE C

| Title | Artist | Plaintiff | Copyright Registration Number |
|---------------------------------|----------------|---|--|
| Changes | 2 Pac | Universal Music Corp., Universal Music - MGB NA LLC | PA 1 070 591 |
| Paris, Tokyo | Lupe Fiasco | Universal Music - MGB NA LLC | PA0001913904 |
| Thugz Mansion (Nas Acoustic) | 2 Pac | Universal Music - MGB NA LLC | PA0001115085 |
| Crazy | Gnarls Barkley | Universal Music - MGB NA LLC | PA0001165223 |

EXHIBIT D

SCHEDULE D

| | Infringing Podcast Title | Song Title | Artist |
|-----|--|--------------------------------------|---------------------------|
| 1. | 2008 APT Day 2 Update | The Number Song | DJ Shadow |
| 2. | 2008 Barcelona EPT Main Event Day 1 Begins | White Wedding | Billy Idol |
| 3. | 2009 APPT Auckland: Player Party | Thought @ Work | The Roots |
| 4. | 40 Years of WSOP - Part 2 of 3 | Baba O'Riley | The Who |
| 5. | APPT Opening Party 2008 | Ba Bump | The Black Eyed Peas |
| 6. | Aussie Millions 2012: Bloopers! | Pretty Little Angel Eyes | Curtis Lee |
| 7. | Calling the Clock on Gloria Balding - 2009 WSOP | It Takes Two | Rob Base |
| 8. | Can you do... ? | Magic Carpet Ride | Steppenwolf, Philip Steir |
| 9. | Daniel Negreanu la 2009 World Series Poker ROMANIAN INTERVIEW | I Know You Got Soul | Eric B. & Rakim |
| 10. | Day 2 at the APPT Macau 2008 | Outstanding | The Gap Band |
| 11. | Drinks on Chad feat. Andy Frankenberger | I WANT YOU | Common |
| 12. | Good Bye Amanda | So Long Goodbye | Sum 41 |
| 13. | GPI Update #8: Schemion Takes POY Lead; Selbst Breaks GPI 300 Top 10 | MONEY MAKER | Ludacris |
| 14. | GPI Update Episode #23: All Hail the King | MONEY MAKER | Ludacris |
| 15. | Grant Levy | The Number Song | DJ Shadow |
| 16. | High Stakes at the APT 2008 | The Number Song | DJ Shadow |
| 17. | JAQK Cellars | Pennies From Heaven | Frank Sinatra |
| 18. | Kirk Morrison - Missing Tiffany- but Loving Barcelona | Every Little Thing She Does Is Magic | The Police |
| 19. | LAPT Playa Conchal 2009: Andre Akkari | Paradise City | Guns N` Roses |
| 20. | LAPT Playa Conchal 2009: Angel Guillen (Español) | Paradise City | Guns N` Roses |
| 21. | LAPT Playa Conchal 2009: Carlos Giron | Paradise City | Guns N` Roses |
| 22. | LAPT Playa Conchal 2009: Daniel "djaniel" Mar | Paradise City | Guns N` Roses |
| 23. | LAPT Playa Conchal 2009: Day 2 Update | Paradise City | Guns N` Roses |
| 24. | LAPT Playa Conchal 2009: | Paradise City | Guns N` Roses |

SCHEDULE D

| | Infringing Podcast Title | Song Title | Artist |
|-----|--|-------------------|---------------|
| | Day 3 Update | | |
| 25. | LAPT Playa Conchal 2009: Final Table Preview | Paradise City | Guns N` Roses |
| 26. | LAPT Playa Conchal 2009: Fred Dykes Takes a Monster Lead | Paradise City | Guns N` Roses |
| 27. | LAPT Playa Conchal 2009: Humberto & Roberto Brenes | Paradise City | Guns N` Roses |
| 28. | LAPT Playa Conchal 2009: JC Alvarado | Paradise City | Guns N` Roses |
| 29. | LAPT Playa Conchal 2009: Maridu Mayrinck | Paradise City | Guns N` Roses |
| 30. | LAPT Playa Conchal 2009: Rogelio Pardo (Español) | Paradise City | Guns N` Roses |
| 31. | LAPT Playa Conchal 2009: Rory "AJ" Graham | Paradise City | Guns N` Roses |
| 32. | LAPT Playa Conchal 2009: Victor Ramdin | Paradise City | Guns N` Roses |
| 33. | LAPT Playa Conchal 2009: What To Do When You Bust? | Paradise City | Guns N` Roses |
| 34. | LAPT Playa Conchal 2009: William Reynolds | Paradise City | Guns N` Roses |
| 35. | Planned Chaos feat. Jason Mecier and Dan O'Brien | SHOW GOES ON, THE | Lupe Fiasco |
| 36. | Planned Chaos feat. Jason Mecier and Dan O'Brien | SUPERSTAR | Lupe Fiasco |
| 37. | PokerNews Cup 2009: Dave Lee | All Star | Smash Mouth |
| 38. | PokerNews Cup VIP Cruise | What They Do | The Roots |
| 39. | PokerNews GPI Update #20: Selbst Soars | MONEY MAKER | Ludacris |
| 40. | PokerNews GPI Update #21: The Return | MONEY MAKER | Ludacris |
| 41. | PokerNews GPI Update #30: 2015 Kickoff | MONEY MAKER | Ludacris |
| 42. | PokerNews GPI Update #9: Schemion Leads the Top 300; Players of the Decade | MONEY MAKER | Ludacris |
| 43. | PokerNews GPI Update Episode #1: Intro to the Podcast, Phil Ivey Falls, and More | MONEY MAKER | Ludacris |
| 44. | PokerNews GPI Update | MONEY MAKER | Ludacris |

SCHEDULE D

| | Infringing Podcast Title | Song Title | Artist |
|-----|---|-------------------|---------------|
| | Episode #11: O Canada | | |
| 45. | PokerNews GPI Update Episode #12: Hellmuth the Egalitarian | MONEY MAKER | Ludacris |
| 46. | PokerNews GPI Update Episode #13: Merson's Climbing | MONEY MAKER | Ludacris |
| 47. | PokerNews GPI Update Episode #14: New POY Leader | MONEY MAKER | Ludacris |
| 48. | PokerNews GPI Update Episode #15: Negreanu Back on Top | MONEY MAKER | Ludacris |
| 49. | PokerNews GPI Update Episode #16: Negreanu Plummets | MONEY MAKER | Ludacris |
| 50. | PokerNews GPI Update Episode #18: WSOP Fantasy Poker Manger News | MONEY MAKER | Ludacris |
| 51. | PokerNews GPI Update Episode #19: WSOP Kickoff | MONEY MAKER | Ludacris |
| 52. | PokerNews GPI Update Episode #22: Muking it Up | MONEY MAKER | Ludacris |
| 53. | PokerNews GPI Update Episode #24: Smith Remains On Top | MONEY MAKER | Ludacris |
| 54. | PokerNews GPI Update Episode #25: Selbst Returns to the Top 10 | MONEY MAKER | Ludacris |
| 55. | PokerNews GPI Update Episode #26: Smith and Colman Separate | MONEY MAKER | Ludacris |
| 56. | PokerNews GPI Update Episode #27: Colman Takes the Lead | MONEY MAKER | Ludacris |
| 57. | PokerNews GPI Update Episode #28: Barer With Me | MONEY MAKER | Ludacris |
| 58. | PokerNews GPI Update Episode #3: Mercier Falls Out of the Top 10; Hellmuth Takes a Hit | MONEY MAKER | Ludacris |
| 59. | PokerNews GPI Update Episode #31: American Poker Awards | MONEY MAKER | Ludacris |
| 60. | PokerNews GPI Update | MONEY MAKER | Ludacris |

SCHEDULE D

| | Infringing Podcast Title | Song Title | Artist |
|-----|---|-------------------|---------------|
| | Episode #32: Cookie Jar Jams | | |
| 61. | PokerNews GPI Update Episode #33: APA Recap, EPA Discussion, and More | MONEY MAKER | Ludacris |
| 62. | PokerNews GPI Update Episode #34: Global Poker Masters Preview and More | MONEY MAKER | Ludacris |
| 63. | PokerNews GPI Update Episode #35: Global Poker Masters Recap, New POY Leader | MONEY MAKER | Ludacris |
| 64. | PokerNews GPI Update Episode #36: EPT Grand Final and Mispronunciations | MONEY MAKER | Ludacris |
| 65. | PokerNews GPI Update Episode #37: We're Back! | MONEY MAKER | Ludacris |
| 66. | PokerNews GPI Update Episode #38: Zinno Can't Extend His Lead | MONEY MAKER | Ludacris |
| 67. | PokerNews GPI Update Episode #39: Giving Thanks | MONEY MAKER | Ludacris |
| 68. | PokerNews GPI Update Episode #5: Daniel Negreanu Tops the POY and GPI 300 | MONEY MAKER | Ludacris |
| 69. | PokerNews GPI Update Episode #6: A Shorr Thing | MONEY MAKER | Ludacris |
| 70. | PokerNews Podcast Episode #113: WSOP Hangover feat. Amit Makhija | WE IN HERE | DMX |
| 71. | PokerNews Podcast Episode #117: It's Good to be King feat. Dan Smith | CHAMPION | Kanye West |
| 72. | PokerNews Podcast Episode #117: It's Good to be King feat. Dan Smith | MILLI, A | Lil Wayne |
| 73. | PokerNews Podcast Episode #124: The French Girl's Mine feat. Rob Salaburu | WON'T BACK DOWN | Eminem |
| 74. | PokerNews Podcast Episode #125 Back in Vegas feat. Jonathan Aguiar | I CAN | Nas |
| 75. | PokerNews Podcast Episode #127: The Return of Full Tilt Poker feat. Greg Merson | CHAMPION | Kanye West |
| 76. | PokerNews Podcast Episode | HEARD 'EM SAY | Kanye West |

SCHEDULE D

| | Infringing Podcast Title | Song Title | Artist |
|-----|---|--|--------------------------|
| | #128: Back to School feat. Jake Balsiger | | |
| 77. | PokerNews Podcast Episode #149: Ultimate Ultimatum feat. Antonio Esfandiari | ALL OF THE LIGHTS | Kanye West |
| 78. | PokerNews Podcast Episode #153: Welcome to the 2013 WSOP | SIRIUS | The Alan Parsons Project |
| 79. | PokerNews Podcast Episode #174: Darwin Moon is on the Lineup feat. Nolan Dalla | TOUCH THE SKY | Kanye West |
| 80. | PokerNews Podcast Episode #178: EPT Barcelona feat. Steven Silverman and Daniel Negreanu | AIN'T NO LOVE IN THE HEART OF THE CITY | Bobby Bland |
| 81. | PokerNews Podcast Episode #189: No Oatmeal for You feat. Mohsin Charania | HOMECOMING | Kanye West |
| 82. | PokerNews Podcast Episode #203: The Nug Life feat. Ty Stewart | THUGZ MANSION (NAS ACOUSTIC) | 2 Pac |
| 83. | PokerNews Podcast Episode #227 feat. Matt Glantz | Touch The Sky | Kanye West |
| 84. | PokerNews Podcast Episode #227: Cream to the Crop feat. Matt Glantz | TOUCH THE SKY | Kanye West |
| 85. | PokerNews Podcast Episode #232: One Drop Reaction feat. David Williams | HERO | Nas |
| 86. | PokerNews Podcast Episode #235: R-E-S-P-E-C-T | DROP IT LIKE IT'S HOT | Snoop Dogg |
| 87. | PokerNews Podcast Episode #244: Bad News Bureaucracy | DROP IT LIKE IT'S HOT | Snoop Dogg |
| 88. | PokerNews Podcast Episode #263: Vote or Die feat. Mukul Pahuja, Jason Mercier, and Jennifer Shahade | CHANGES | 2 Pac |
| 89. | PokerNews Podcast Episode #282: Mizzi Binks | DROP IT LIKE IT'S HOT | Snoop Dogg |
| 90. | PokerNews Podcast Episode 100: Celebration feat. Andy Frankenger | TOUCH THE SKY | Kanye West |
| 91. | Pokernews podcast November 4th, 2010 | TOUCH THE SKY | Kanye West |
| 92. | PokerNews Podcast: \$50K | CHAMPION | Kanye West |

SCHEDULE D

| | Infringing Podcast Title | Song Title | Artist |
|------|--|-----------------------|--------------------------|
| | Poker Player's Championship | | |
| 93. | PokerNews Podcast: Back, Bust and Bounce feat. Blair Hinkle | MILLI, A | Lil Wayne |
| 94. | PokerNews Podcast: Bankroll Management feat. Jean-Robert Bellande | POWER | Kanye West |
| 95. | PokerNews Podcast: Black Friday Anniversary feat. Samuel Chartier | GOOD MORNING | Kanye West |
| 96. | PokerNews Podcast: Boom! Kristy is a MiniFTOPS Champion! (feat. Deuces Cracked's Jay Rosenkratz) | CHAMPION | Kanye West |
| 97. | PokerNews Podcast: Boom! Kristy is a MiniFTOPS Champion! (feat. Deuces Cracked's Jay Rosenkratz) | KID CHARLEMAGNE | Steely Dan |
| 98. | PokerNews Podcast: Boom! Kristy is a MiniFTOPS Champion! (feat. Deuces Cracked's Jay Rosenkratz) | TRILLIONAIRE | Bun B |
| 99. | PokerNews Podcast: EPT San Remo feat. Lex Veldhuis | I WANT YOU | Common |
| 100. | PokerNews Podcast: Friday feat. Ty Stewart | CRAZY | Gnarls Barkley |
| 101. | PokerNews Podcast: Frolf feat. Randall Flowers | COMING HOME | Diddy-Dirty Money |
| 102. | PokerNews Podcast: Get Your Ass On The Internet feat. Victor Ramdin | WON'T BACK DOWN | Eminem |
| 103. | PokerNews Podcast: Have No Mercier feat. Lauren Kling | GOOD MORNING | Kanye West |
| 104. | PokerNews Podcast: Midwestern Poker feat. Eric "basebaldy" Baldwin | FRIENDS IN LOW PLACES | Garth Brooks |
| 105. | PokerNews Podcast: Monkey Tilt feat. Randy Lew and Adam Geyer | CLAP BACK | Ja Rule |
| 106. | PokerNews Podcast: November Nine Dinner Break Special | SIRIUS | The Alan Parsons Project |
| 107. | PokerNews Podcast: Planet...arium feat. Jay Rosenkrantz | TOUCH THE SKY | Kanye West |

SCHEDULE D

| | Infringing Podcast Title | Song Title | Artist |
|------|--|--------------------|---------------|
| 108. | PokerNews Podcast: Point and Grab featuring Tony G | WORDS I NEVER SAID | Lupe Fiasco |
| 109. | PokerNews Podcast: Rio Rookie feat. Zach Gruneberg | STAR IS BORN, A | Jay-Z |
| 110. | PokerNews Podcast: Run Ashton, Run feat. Ashton Griffin and Mer Brit | CLAP BACK | Ja Rule |
| 111. | PokerNews Podcast: Songified feat. Andre Akkari | CH-CHECK IT OUT | Beastie Boys |
| 112. | PokerNews Podcast: Super Maria feat. Maria Ho | GOOD LIFE | Kanye West |
| 113. | PokerNews Podcast: Super Maria feat. Maria Ho | MAKE HER SAY | Kid Cudi |
| 114. | PokerNews Podcast: Super Maria feat. Maria Ho | PARIS, TOKYO | Lupe Fiasco |
| 115. | PokerNews Podcast: That's Not a Knife feat. Maria Ho | CLAP BACK | Ja Rule |
| 116. | PokerNews Podcast: The Big Event feat. Chris Moneymaker | MONEY MAKER | Ludacris |
| 117. | PokerNews Podcast: UB Layoffs feat. Maria Ho | MAGIC | B.O.B. |
| 118. | PokerNews Podcast: Wash Your Ball Pits feat. Andrew Seidman | MOSH | Eminem |
| 119. | PokerNews Podcast: We Will Rock You feat. Daniel Negreanu | CLAP BACK | Ja Rule |
| 120. | PokerNews Podcast: We'll Do it Live! 2011 WSOP Preview Show | HOME COMING | Kanye West |
| 121. | Remko Report Episode #1: Ryan Riess | TOUCH THE SKY | Kanye West |
| 122. | Remko Report Episode #10: Hermance Blum and Frank Op de Woerd | TOUCH THE SKY | Kanye West |
| 123. | Remko Report Episode #11: Dong Kim | TOUCH THE SKY | Kanye West |
| 124. | Remko Report Episode #11: Vanessa Rousso | TOUCH THE SKY | Kanye West |
| 125. | Remko Report Episode #13: REG Charity | TOUCH THE SKY | Kanye West |
| 126. | Remko Report Episode #14: Fatima Moreira de Melo | TOUCH THE SKY | Kanye West |

SCHEDULE D

| | Infringing Podcast Title | Song Title | Artist |
|------|--|-------------------|---------------|
| 127. | Remko Report Episode #15: Jason Wheeler | TOUCH THE SKY | Kanye West |
| 128. | Remko Report Episode #16: Jason Les | TOUCH THE SKY | Kanye West |
| 129. | Remko Report Episode #17: Shannon Shorr | TOUCH THE SKY | Kanye West |
| 130. | Remko Report Episode #18: Brian Rast | TOUCH THE SKY | Kanye West |
| 131. | Remko Report Episode #19: Eli Elezra | TOUCH THE SKY | Kanye West |
| 132. | Remko Report Episode #2: Danny McDonagh | TOUCH THE SKY | Kanye West |
| 133. | Remko Report Episode #2: Jorrry van Hoof | TOUCH THE SKY | Kanye West |
| 134. | Remko Report Episode #20: Norman Chad | TOUCH THE SKY | Kanye West |
| 135. | Remko Report Episode #21: Nolan Dalla | TOUCH THE SKY | Kanye West |
| 136. | Remko Report Episode #22: Talal Shakerchi | TOUCH THE SKY | Kanye West |
| 137. | Remko Report Episode #23: November Niner Max Steinberg | TOUCH THE SKY | Kanye West |
| 138. | Remko Report Episode #4: Terrence Chan | TOUCH THE SKY | Kanye West |
| 139. | Remko Report Episode #5: Jason Koon | TOUCH THE SKY | Kanye West |
| 140. | Remko Report Episode #6: Noah Schwartz | TOUCH THE SKY | Kanye West |
| 141. | Remko Report Episode #7: Daniel Negreanu | TOUCH THE SKY | Kanye West |
| 142. | Remko Report Episode #8: George Danzer | TOUCH THE SKY | Kanye West |
| 143. | Remko Report Episode #9: Mike Leah | TOUCH THE SKY | Kanye West |
| 144. | Roger Sanchez Live at Teatre Principal Barcelona 2014 Part 2 | Here For You | Gorgon City |
| 145. | Strategy With Kristy feat. Jesse Martin | I CAN | Nas |
| 146. | Strategy With Kristy feat. Lauren Kling | I CAN | Nas |
| 147. | Strategy With Kristy feat. Paul Berende and Sorel Mizzi | I CAN | Nas |

SCHEDULE D

| | Infringing Podcast Title | Song Title | Artist |
|------|--|-------------------|---------------|
| 148. | Strategy with Kristy Podcast Part 2 with Tommy Angelo | I CAN | Nas |
| 149. | Strategy with Kristy Podcast: Adrienne Rowsome Discusses Seven-Card Stud Eight-or-Better | I CAN | Nas |
| 150. | Strategy With Kristy Podcast: Nick Rampone | I CAN | Nas |
| 151. | Strategy with Kristy Podcast: Observations of Successful Live Pros | I CAN | Nas |
| 152. | Strategy With Kristy Podcast: Team PokerStars Online's Mickey Petersen | I CAN | Nas |
| 153. | Strategy with Kristy: A Must Listen Before WSOP Main Event with Jared Tendler | I CAN | Nas |
| 154. | Strategy With Kristy: Aaron Jones | I CAN | Nas |
| 155. | Strategy With Kristy: Aaron Jones Part II | I CAN | Nas |
| 156. | Strategy with Kristy: Aaron Steinberg Discusses Poker Psychology Coaching | I CAN | Nas |
| 157. | Strategy With Kristy: Alec Torelli | I CAN | Nas |
| 158. | Strategy With Kristy: Alec Torelli Part II | I CAN | Nas |
| 159. | Strategy With Kristy: Amanda Musumeci | I CAN | Nas |
| 160. | Strategy with Kristy: Andrew "BalugaWhale" Seidman pt. II | I CAN | Nas |
| 161. | Strategy With Kristy: Andrew Brokos | I CAN | Nas |
| 162. | Strategy With Kristy: Andrew Robl | I CAN | Nas |
| 163. | Strategy With Kristy: Andrew Seidman talks MTTs | I CAN | Nas |
| 164. | Strategy With Kristy: APPT Seoul | I CAN | Nas |
| 165. | Strategy with Kristy: Ari Engel Discusses Tournament Strategy | I CAN | Nas |
| 166. | Strategy With Kristy: Ben | I CAN | Nas |

SCHEDULE D

| | Infringing Podcast Title | Song Title | Artist |
|------|---|-------------------|---------------|
| | Wilinofsky | | |
| 167. | Strategy With Kristy: Blair Hinkle | I CAN | Nas |
| 168. | Strategy With Kristy: Chris George | I CAN | Nas |
| 169. | Strategy With Kristy: Christina Lindley | I CAN | Nas |
| 170. | Strategy With Kristy: Cylus Watson | I CAN | Nas |
| 171. | Strategy with Kristy: Danielle Andersen Discusses Longevity and Balance in Poker | I CAN | Nas |
| 172. | Strategy with Kristy: Darren Rabinowitz on Break in Aussie Millions Main Event | I CAN | Nas |
| 173. | Strategy With Kristy: Darryll Fish | I CAN | Nas |
| 174. | Strategy With Kristy: Darryll Fish Talks WPT Lucky Hearts Poker Open | I CAN | Nas |
| 175. | Strategy With Kristy: David “Doc” Sands | I CAN | Nas |
| 176. | Strategy With Kristy: David Randall | I CAN | Nas |
| 177. | Strategy With Kristy: David Randall at WSOP | I CAN | Nas |
| 178. | Strategy With Kristy: David Randall Discusses Deep Run | I CAN | Nas |
| 179. | Strategy With Kristy: Denny Man | I CAN | Nas |
| 180. | Strategy With Kristy: Easy Game feat. Andrew “BalugaWhale” Seidman | I CAN | Nas |
| 181. | Strategy With Kristy: EPT Barcelona feat. Mike McDonald and Mike Watson | I CAN | Nas |
| 182. | Strategy With Kristy: EPT Grand Final feat. Daniel Negreanu, Randy Lew, and Mickey Petersen | I CAN | Nas |
| 183. | Strategy With Kristy: Eric Froehlich | I CAN | Nas |
| 184. | Strategy With Kristy: Floating OOP feat. Reid | I CAN | Nas |

SCHEDULE D

| | Infringing Podcast Title | Song Title | Artist |
|------|---|-------------------|---------------|
| | Young | | |
| 185. | Strategy With Kristy: Frank Rusnak | I CAN | Nas |
| 186. | Strategy with Kristy: Galen Hall Talks About How to Get Better at Poker Quickly | I CAN | Nas |
| 187. | Strategy With Kristy: Griffin Benger | I CAN | Nas |
| 188. | Strategy With Kristy: Gus Voelzel | I CAN | Nas |
| 189. | Strategy With Kristy: Jared Bleznick | I CAN | Nas |
| 190. | Strategy With Kristy: Jared Tandler | I CAN | Nas |
| 191. | Strategy With Kristy: Jared Tandler | I CAN | Nas |
| 192. | Strategy With Kristy: Jared Tandler Part II | I CAN | Nas |
| 193. | Strategy With Kristy: Jason Koon | I CAN | Nas |
| 194. | Strategy With Kristy: Jason Koon | I CAN | Nas |
| 195. | Strategy with Kristy: Jason Lavalley Discusses a Queen-High Call | I CAN | Nas |
| 196. | Strategy With Kristy: Jason Somerville | I CAN | Nas |
| 197. | Strategy With Kristy: Jaymes Rosenthal, Berk Brown, and Jon Hemmer | I CAN | Nas |
| 198. | Strategy With Kristy: John Kim Part I | I CAN | Nas |
| 199. | Strategy With Kristy: John Kim Part II | I CAN | Nas |
| 200. | Strategy With Kristy: John Racener | I CAN | Nas |
| 201. | Strategy With Kristy: Johnny Lodden and Theo Jorgensen | I CAN | Nas |
| 202. | Strategy With Kristy: Jonathan Little | I CAN | Nas |
| 203. | Strategy With Kristy: Jonathan Little Returns | I CAN | Nas |
| 204. | Strategy With Kristy: Kane Kalas | I CAN | Nas |

SCHEDULE D

| | Infringing Podcast Title | Song Title | Artist |
|------|---|-------------------|---------------|
| 205. | Strategy with Kristy: Kristy Discusses Poker Night in America Experience | I CAN | Nas |
| 206. | Strategy With Kristy: Live Cash Games feat. Andrew Moreno and Lincoln Garner | I CAN | Nas |
| 207. | Strategy With Kristy: Live Cash Games Pt. III feat. Nick DiVella | I CAN | Nas |
| 208. | Strategy With Kristy: Live Cash Games Pt. IV feat. Matt Mercurio and Berk Brown | I CAN | Nas |
| 209. | Strategy With Kristy: Max Steinberg | I CAN | Nas |
| 210. | Strategy With Kristy: Max Steinberg discusses deep runs at the WSOP | I CAN | Nas |
| 211. | Strategy with Kristy: Max Steinberg Talks About Busting Phil Ivey in the WSOP Main Event | I CAN | Nas |
| 212. | Strategy with Kristy: Melanie Weisner Analyzes Hands from WSOP | I CAN | Nas |
| 213. | Strategy With Kristy: Mental Game of Poker 2 feat. Jared Tendler | I CAN | Nas |
| 214. | Strategy With Kristy: Mike “Timex” McDonald | I CAN | Nas |
| 215. | Strategy With Kristy: Mike McDonald Part 1 | I CAN | Nas |
| 216. | Strategy with Kristy: Mike Watson Discusses Playing Big Stacks | I CAN | Nas |
| 217. | Strategy With Kristy: Nick DiVella | I CAN | Nas |
| 218. | Strategy With Kristy: Nick DiVella | I CAN | Nas |
| 219. | Strategy With Kristy: Nick Rampone Part 2 | I CAN | Nas |
| 220. | Strategy with Kristy: Nikolai Yakovenko Discusses Open Face Chinese Poker Strategy Part 1 | I CAN | Nas |
| 221. | Strategy with Kristy: Nikolai | I CAN | Nas |

SCHEDULE D

| | Infringing Podcast Title | Song Title | Artist |
|------|---|-------------------|---------------|
| | Yakovenko Discusses Open Face Chinese Poker Strategy Part 2 | | |
| 222. | Strategy With Kristy: Nikolai Yakovenko Discusses Pineapple Open-Face Chinese Poker | I CAN | Nas |
| 223. | Strategy With Kristy: Olivier Busquet | I CAN | Nas |
| 224. | Strategy With Kristy: Open Face Chinese Poker feat. Jason Mercier and Shaun Deeb | I CAN | Nas |
| 225. | Strategy With Kristy: Paul Volpe | I CAN | Nas |
| 226. | Strategy With Kristy: Penultimate Episode with Andrew Seidman | I CAN | Nas |
| 227. | Strategy With Kristy: Phil Collins | I CAN | Nas |
| 228. | Strategy With Kristy: Phil Collins on MTTs | I CAN | Nas |
| 229. | Strategy With Kristy: PLO with Lex Veldhuis | I CAN | Nas |
| 230. | Strategy with Kristy: Poker Math Part 1 | I CAN | Nas |
| 231. | Strategy with Kristy: Poker Math Part 2 with Aaron Wilt | I CAN | Nas |
| 232. | Strategy With Kristy: Prepping for the WSOP | I CAN | Nas |
| 233. | Strategy With Kristy: Quinn Sivage | I CAN | Nas |
| 234. | Strategy With Kristy: Quinn Sivage Pt. II | I CAN | Nas |
| 235. | Strategy With Kristy: Ramzi Jelassi | I CAN | Nas |
| 236. | Strategy With Kristy: Randal Flowers | I CAN | Nas |
| 237. | Strategy With Kristy: Reid Young | I CAN | Nas |
| 238. | Strategy With Kristy: Reid Young Part II | I CAN | Nas |
| 239. | Strategy With Kristy: Ronit Chamani | I CAN | Nas |

SCHEDULE D

| | Infringing Podcast Title | Song Title | Artist |
|------|--|-------------------|---------------|
| 240. | Strategy With Kristy: Ryan “g0lfa” D’Angelo | I CAN | Nas |
| 241. | Strategy With Kristy: Staking With Daniel Negreanu and Jason Somerville | I CAN | Nas |
| 242. | Strategy With Kristy: Taxes | I CAN | Nas |
| 243. | Strategy With Kristy: Terrence Chan | I CAN | Nas |
| 244. | Strategy With Kristy: The Final Episode feat. Andrew Seidman | I CAN | Nas |
| 245. | Strategy With Kristy: Timothy Adams | I CAN | Nas |
| 246. | Strategy With Kristy: Tommy Angelo pt. I | I CAN | Nas |
| 247. | Strategy With Kristy: Traveling feat. Vanessa Rousso, Lex Veldhuis, and Liv Boeree | I CAN | Nas |
| 248. | Strategy with Kristy: Two Hands from the One Drop High Roller | I CAN | Nas |
| 249. | Strategy with Kristy: WiltOnTilt Part I | I CAN | Nas |
| 250. | Strategy with Kristy: WSOP Quickie with Darryll Fish | I CAN | Nas |
| 251. | Timoshenko Wins!!! | The Number Song | DJ Shadow |
| 252. | Welcome to the 2009 PokerStars.net LAPT Playa Conchal | Paradise City | Guns N` Roses |
| 253. | World Series of BBQ and Lederer Charity Tournament | Sweet Caroline | Neil Diamond |