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U.S. DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

APR - 3 2005

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

ATLANTIC RECORDING CORPORATION,)
a corporation; ARISTA RECORDS, INC., A)
corporation; BMG MUSIC, a general partnership;)
CAPITOL RECORDS, INC., a corporation;)
ELEKTRA ENTERTAINMENT GROUP INC., a)
corporation; FONOVISA, INC., a corporation)
INTERSCOPE RECORDS, a general)
partnership; LAVA RECORDS LLC, a)
limited liability corporation; LONDON-SIRE)
RECORDS INC., a corporation; LOUD)
RECORDS LLC, a limited liability corporation;)
MAVERICK RECORDING COMPANY, a joint)
venture; MOTOWN RECORD COMPANY,)
L.P., a limited partnership; SONY MUSIC)
ENTERTAINMENT INC., a corporation;)
UMG RECORDINGS, INC., a corporation;)
VIRGIN RECORDS AMERICA, INC., a)
corporation; WARNER BROS. RECORDS, INC.,)
a corporation; and ZOMBA RECORDING)
CORPORATION, a corporation,)

Plaintiffs,)

v.)

DANIEL PENG)

Defendant.)

CIVIL NO. 03-1441 (SRL)

COMPLAINT FOR DIRECT
AND CONTRIBUTORY
COPYRIGHT
INFRINGEMENT

Plaintiffs aver:

NATURE OF THE ACTION

1. This is an action for direct and contributory copyright infringement arising out of the knowing and willful conduct of Defendant. Defendant has hijacked an academic computer network and installed on it a marketplace for copyright piracy that is used by others to copy and distribute music illegally. In addition to operating this piracy marketplace that facilitates direct copyright infringement by others, Defendant is committing direct copyright infringement himself by copying and distributing hundreds of sound recordings over his system without the authorization of the copyright owners.

2. Defendant has established, maintains, and controls this self-contained system that uses the resources of the Princeton University computer network and is accessible to all of the users of the University network. This system operates similarly to the Napster system, which was shut down by a federal court injunction due to its blatant facilitation of copyright infringement. Thus, Defendant has taken a network created for higher learning and academic pursuits and converted it into an emporium of music piracy where copyright infringement is simplified down to the click of a computer mouse. Like Napster, Defendant's system provides users of the University network with infrastructure and facilities for committing copyright infringement. Those facilities include access to a central computer server, a continuously updated index of infringing recordings available on Defendant's own system, and a method that facilitates the rapid and efficient copying and distribution of those recordings. Users connect to the computer server operated by Defendant at the Internet site, "<http://wake.princeton.edu/>," to search for, locate, and make copies of Plaintiffs' copyrighted sound recordings that are being made available by

other users of the network; those copies are then distributed further for copying by other users, all without the authorization of the copyright owners.

3. All of the most popular sound recordings, as well as many up and coming artists, are being infringed through Defendant's system. Schedule A to this Complaint, which is incorporated herein, provides a list of some of the songs that are unlawfully being copied over the Defendant's system ("the Copyrighted Recordings"). Among the well known artists are Bruce Springsteen, Santana, Billy Joel, Norah Jones, Madonna, Christina Aguilera, U2 and Eminem.

4. Defendant is acutely aware of the infringing activity occurring through his system since he himself is copying and distributing hundreds of sound recordings over his system without the authorization of the copyright owners. The sound recordings being distributed by Defendant himself include works by Bruce Springsteen, Everclear, Green Day, blink-182, U2, and Smash Mouth.

5. Defendant's conduct has caused and continues to cause Plaintiffs grave and irreparable harm.

JURISDICTION AND VENUE

6. This is a civil action for damages and injunctive relief for copyright infringement under the Copyright Law of the United States, 17 U.S.C. sections 502, 504, and 505.

7. This Court has jurisdiction of this action under 17 U.S.C. section 501(b); 28 U.S.C. section 1331; and 28 U.S.C. section 1338(a).

8. This Court has personal jurisdiction over Defendant in that Defendant resides in this District. In addition, a substantial part of the acts of infringement complained of herein occurred in this District.

9. Venue is proper in this District under 28 U.S.C. section 1400(a) because Defendant resides and may be found in this District.

THE PARTIES

10. 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.

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.

12. Plaintiff BMG Music is a New York general partnership, with its principal place of business in New York.

13. Plaintiff Capitol Records, Inc. is a corporation duly organized and existing under the laws of the State of Delaware, with a place of business in New York.

14. 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.

15. 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.

16. Plaintiff Interscope Records is a California general partnership, with its principal place of business in the State of California.

17. Plaintiff Lava Records LLC is a limited liability corporation duly organized and existing under the laws of the State of Delaware, with its principal place of business in the State of New York.

18. Plaintiff London-Sire Records Inc. is a limited liability corporation duly organized and existing under the laws of the State of Delaware, with its principal place of business in New York.

19. Plaintiff Loud Records LLC is a corporation duly organized and existing under the laws of the state of Delaware, with its principal place of business in the State of New York.

20. Plaintiff Maverick Recording Company is a joint venture between Maverick Records and Warner Bros. Records Inc., organized and existing under the laws of California, with its principal place of business in California.

21. Plaintiff Motown Record Company, L.P. is a California limited partnership, with its principal place of business in New York.

22. 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.

23. Plaintiff UMG Recordings, Inc. is a corporation duly organized and existing under laws of the State of Delaware, with its principal place of business in California.

24. Plaintiff Virgin Records America, Inc. is a corporation duly organized and existing under the laws of the State of California, with a place of business in New York.

25. 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 the State of California.

26. Plaintiff Zomba Recording Corporation is a corporation duly organized and existing under the laws of the State of New York, with a place of business in New York.

27. Defendant Daniel Peng is an individual who is currently a student at Princeton University and resides and may be found in Princeton, New Jersey.

PLAINTIFFS' BUSINESS

28. Plaintiffs are engaged in the business of producing sound recordings, and manufacturing, distributing, selling, and/or licensing the distribution and sale of their sound recordings in phonorecords (as defined in 17 U.S.C. section 101, and including,

without limitation, compact discs and other digital formats). Plaintiffs are among the leading manufacturers of such phonorecords in the United States.

29. Plaintiffs have invested and continue to invest substantial sums of money, as well as time, effort, and creative talent, to discover and develop recording artists, and to create, manufacture, advertise, promote, sell, and license phonorecords embodying the performances of their exclusive recording artists. Plaintiffs, their recording artists, and others are compensated for their creative efforts and monetary investments largely from the sale and distribution of phonorecords to the public and from other exploitation of such phonorecords.

30. Plaintiffs are the copyright owners or owners of exclusive rights under copyright with respect to certain copyrighted sound recordings embodied in their phonorecords, including but not limited to those listed on Schedule A attached hereto and incorporated by reference herein. Each Plaintiff has applied for and/or received Certificates of Copyright Registration from the Register of Copyrights for its Copyrighted Recordings. Each Plaintiff has the exclusive rights, among other things, to "reproduce the [Copyrighted Recordings] in copies or phonorecords," and to "distribute copies [of the Copyrighted Recordings] or phonorecords . . . to the public." 17 U.S.C. sections 106(1) and 106(3).

UNIVERSITY LOCAL AREA NETWORKS

31. Every university provides their faculty, students, and staff with access to computer services and resources. Such computer resources are provided to assist faculty and students in their academic endeavors, and to assist staff in the administration of

university affairs. Two such computer resources are access to the Internet and provision of and access to a university Local Area Network, or "LAN."

32. Access to the Internet by university internet users is typically done through a T1 or T3 connection that provides for very high speed access, allowing use of the Internet in a very quick and efficient manner that is far superior to much slower "dial up" access over telephone lines. Many university Internet users use their high speed Internet access not for academic pursuits, but to connect to and use certain Internet "peer-to-peer" networks for the purpose of unlawfully copying and distributing copyrighted sound recordings and other copyrighted content to and from their personal computers. The most notorious of such systems was the Napster system, which was shut down by a federal court injunction. Other similar systems such as the Kazaa system are the subject of pending litigation in the U.S. District Court for the Central District of California brought by copyright holders including Plaintiffs here.

33. Copyright infringement over university networks has become a serious problem for Plaintiffs and other copyright owners, as well as for universities. Recent statistics have indicated that, at some universities, nearly 50 percent of the available Internet computer resources (known as "bandwidth") are being used for the unauthorized copying and distribution of copyrighted material. Such conduct has greatly taxed the capacity of university computer network resources and has greatly increased the cost of providing and maintaining those resources. Additionally, these file-trading systems raise liability and security concerns for universities. In response, many universities have restricted or banned entirely access to such infringing peer-to-peer systems from computers that are part of the universities' networks.

34. For example, in or around September 2002, administrators at Princeton University warned students that those who continued to connect to and use these Internet peer-to-peer systems could be placed on a slower part of the university's network.

35. In part, at least, because such restrictions limit the ability of university network users to illegally copy music and other copyrighted materials from outside the university network (over Internet peer-to-peer systems), some individuals have sought to replicate such peer-to-peer systems (i.e., Napster equivalent systems) within the university network. This is done by creating, maintaining, and operating the equivalent of such systems on LANs provided by universities to their faculty, students, and staff. A LAN is a computer network that is dispersed over a limited, defined geographic area, such as a university campus, through which a user computer can interact with all other user computers on the network. In many respects, a university LAN operates as a "mini-internet" for university users only.

36. Without a Napster equivalent system, LAN users cannot effectively search for and transfer song recordings over the network. On a typical LAN, there is no centralized index of all sound recordings that users have designated for copying and transfer over the network. As a result, there is no efficient way for a user to know which sound recordings are available on which computers, or for users to gain access to available sound recordings.

DEFENDANT'S INFRINGING CONDUCT

37. Defendant created a system that is designed to enable and facilitate the widespread unauthorized copying and distribution of sound recordings over Princeton University's LAN. Defendant has installed, operates, and maintains a computer server

that provides indexing and search processing functions for users of that LAN. Defendant's server actively scours the network for files that others have designated for copying and distribution, and indexes the names of those files even without the knowledge or acquiescence of network users who have so designated those files, and without the consent of the copyright owners of the works embodied in those files. Defendant's server inventories the music files each user has designated for copying and distribution, maintains a centralized index of the names of those music files, and makes that index available to users of the LAN. In this manner, files that a user maintains on his or her hard drive are made available for copying and distribution by all users of the LAN regardless of the intention of the users who initially designated those files, and often without their knowledge.

38. Defendant further has established and maintains an Internet site containing a copyright notice that is accessible over the World Wide Web at the URL ><http://wake.princeton.edu/><. By accessing that web site, users of the LAN search for and locate sound recordings that Defendant has indexed for copying and distribution by typing in search terms into a search window provided by Defendant. Results of the search are then returned to the user. These results include the file names of the sound recordings that match the search term and the location on the LAN of users' computers that are making those sound recordings available for copying and distribution over the LAN. A user need only click on a particular search result, and the file containing the sound recording is automatically downloaded – i.e., copied and saved – directly from the offering user's computer to the hard drive of the requesting user's computer.

39. Through the centralized indexing, searching, and file transfer functions provided and maintained by Defendant, Defendant has functionally replicated the unlawful systems that facilitate and enable the massive infringement of copyrighted

sound recordings on the Internet, and that have been enjoined by courts in other cases, such as Napster, Aimster, and AudioGalaxy. The centralized index, search, transfer, and other functions provided by Defendant are equivalent to the functions that were provided by the notorious Napster system, which was enjoined and ultimately shut down as a consequence of the copyright infringement that it enabled and facilitated. In at least one way, however, Defendant's system is even a more efficient and effective infringement system than was Napster's. In Napster, a user affirmatively was required to log on to the system in order to make available MP3 files for copying and distribution. As averred above, however, Defendant's system actively searches for, inventories, and indexes all filenames that are being made available on the network regardless of whether the user offering the files has intended them to be made available to all other users on the network or not.

40. Defendant is well aware of the widespread piracy of copyrighted recordings over his system. Defendant maintains on his web site the "top 20 searches" that have been carried out on his system, and that list shows that a search for the popular artist, Eminem, is one of the more frequent searches executed on Defendant's system. Also, Defendant's system is even promoted as a source for "MP3" files in an online publication called "The Princeton Pauper." Defendant should be aware of this promotion as his own web site provides a direct link to this online publication. Most telling of Defendant's knowledge of the widespread piracy conducted over his system is that Defendant himself uses this system to distribute MP3 files, many of which contain songs owned by Plaintiffs. Defendant has downloaded over his system hundreds of songs owned by Plaintiffs and many of the files that Defendant has made available for widespread distribution on his system are copyrighted recordings.

41. Defendant's web site also has been the subject of an article in the university newspaper, "The Daily Princetonian." In November 2002, the newspaper highlighted the centralized indexing and searching functions provided by Defendant's web site that enable students to more efficiently "get music" on the university's network.

42. The system that Defendant has created, controls, and maintains thus enables and facilitates the large-scale unauthorized copying and distribution of the copyrighted recordings over Princeton University's LAN. Such infringements would not occur on the scale or the manner in which they do without the conduct and participation of Defendant, who provides the infrastructure and technological means to accomplish these infringements. Schedule A provides only a subset of the recordings that are being unlawfully copied through Defendant's system. As detailed in Schedule A, the Copyrighted Recordings copied and distributed without authorization over Defendant's system include many of the most popular recordings by the most popular recording artists, including, but in no way limited to, Bruce Springsteen, Santana, Billy Joel, Norah Jones, Madonna, Christina Aguilera, U2 and Eminem.

43. Defendant's unlawful conduct does not end there, however. Defendant himself is distributing hundreds of copyrighted sound recordings without authorization that he unlawfully downloaded and thus copied. From a web site he maintains, Defendant has distributed and continues to distribute, for unauthorized copying by others, hundreds of copyrighted sound recordings, including works by Bruce Springsteen, Everclear, Green Day, blink-182, U2, and Smash Mouth. Through this conduct, Defendant is distributing, without authorization, Plaintiffs' Copyrighted Recordings for copying by anyone on the LAN who accesses his web site.

FIRST CLAIM FOR RELIEF

DIRECT INFRINGEMENT OF COPYRIGHTS

[By All Plaintiffs Against Defendant]

44. Plaintiffs incorporate herein by this reference each and every averment contained in paragraphs 1 through 43 inclusive.

45. Defendant, without the permission or consent of Plaintiffs who hold valid copyrights on the Copyrighted Recordings, has reproduced and distributed and/or has caused the reproduction and distribution of the Copyrighted Recordings.

46. The infringement of Plaintiffs' rights in and to each of the Copyrighted Recordings constitutes a separate and distinct act of infringement.

47. The foregoing acts of infringement have been willful, intentional, and purposeful, in disregard of and indifference to the rights of Plaintiffs.

48. The acts of Defendant complained of herein constitute infringement of Plaintiffs' registered copyrights and exclusive rights under copyright in violation of 17 U.S.C. sections 106 and 501.

49. As a direct and proximate result of Defendant's infringement of Plaintiffs' copyrights and exclusive rights under copyright, Plaintiffs are entitled to the maximum statutory damages, pursuant to 17 U.S.C. section 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. section 504(c).

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

51. Defendant's conduct, as hereinabove averred, is causing and, unless enjoined and restrained by this Court, will continue to cause Plaintiffs great and irreparable injury that cannot fully be compensated or measured in money. Plaintiffs have no adequate remedy at law. Pursuant to 17 U.S.C. section 502, Plaintiffs are entitled to preliminary and permanent injunctions prohibiting further infringements of Plaintiffs' copyrights and exclusive rights under copyright.

SECOND CLAIM FOR RELIEF

CONTRIBUTORY INFRINGEMENT OF COPYRIGHTS

[By All Plaintiffs Against Defendant]

52. Plaintiffs incorporate herein by this reference each and every averment contained in Paragraphs 1 through 43 inclusive.

53. Defendant has knowingly and systematically induced, caused, and materially contributed to the above-described unauthorized copying and distribution of the Copyrighted Recordings and thus to the infringement of Plaintiffs' copyrights and exclusive rights under copyright in the Copyrighted Recordings.

54. The infringement of each of Plaintiffs' rights in and to the Copyrighted Recordings constitutes a separate and distinct act of infringement.

55. The foregoing acts of infringement by Defendant have been willful, intentional, and purposeful, in disregard of and indifference to the rights of Plaintiffs.

56. Defendant's conduct constitutes contributory infringement of Plaintiffs' copyrights and Plaintiffs' exclusive rights under copyright in violation of 17 U.S.C. sections 106 and 501.

57. As a direct and proximate result of Defendant's infringement of Plaintiffs' copyrights and exclusive rights under copyright, Plaintiffs are entitled to the maximum statutory damages, pursuant to 17 U.S.C. section 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. section 504(c).

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

59. Defendant's conduct, as hereinabove averred, is causing and, unless enjoined and restrained by this Court, will continue to cause Plaintiffs great and irreparable injury that cannot fully be compensated or measured in money. Plaintiffs have no adequate remedy at law. Pursuant to 17 U.S.C. section 502, Plaintiffs are entitled to preliminary and permanent injunctions prohibiting further contributory infringements of Plaintiffs' copyrights and exclusive rights under copyright.

WHEREFORE, Plaintiffs pray for judgment against Defendant as follows:

1. For a preliminary and a permanent injunction enjoining Defendant, and all persons acting in concert or participation with him, from: (i) directly or indirectly infringing in any manner any of Plaintiffs' respective copyrights (whether now in existence or hereafter created), and exclusive rights under copyright, including without


limitation, the Copyrighted Recordings listed on Schedule A, and (ii) from causing, contributing to, enabling, facilitating, or participating in the infringement of any of Plaintiffs' respective copyrights, and exclusive rights under copyright, including without limitation, the Copyrighted Recordings listed on Schedule A.

2. For maximum statutory damages in the amount of \$150,000 with respect to each copyrighted work infringed, or for such other amounts as may be proper pursuant to 17 U.S.C. section 504(c);

3. For Plaintiffs' attorneys' fees, full costs, and disbursements in this action; and

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

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Date: April 3, 2003

Schedule A

Plaintiff	Artist	Song	Album	SR
Arista Records, Inc.	Ace Of Base	Cruel Summer	Cruel Summer	189-302
Arista Records, Inc.	Ace Of Base	All That She Wants	The Sign	169-749
Arista Records, Inc.	Adema	Freaking Out [Chris Vrenna Remix]	Adema	302-233
Arista Records, Inc.	Air Supply	All Out Of Love	Lost in Love	38-070
Arista Records, Inc.	Alan Jackson	Wanted	Here in the Real World	117-974
Arista Records, Inc.	Alan Jackson	It Must Be Love	Under the Influence	303-828
Arista Records, Inc.	Alan Jackson	www.memory	When Somebody Loves You	289-367
Arista Records, Inc.	Babyface	There She Goes	Face 2 Face	305-629
Arista Records, Inc.	Brad Paisley	Two People Fell in Love	Part II	298-930
Arista Records, Inc.	Brand Nubian	Back Up off the Wall	Foundation	264-001
Arista Records, Inc.	Carolyn Dawn Johnson	Complicated	Room With a View	301-081
Arista Records, Inc.	Cee-Lo	Closet Freak	Cee-Lo Green and His Perfect Imperfections	312-129
Arista Records, Inc.	Diamond Rio	How Your Love Makes Me Feel	Greatest Hits	241-042
Arista Records, Inc.	Dido	All You Want	No Angel	289-904
Arista Records, Inc.	Five	We Will Rock You	Invincible	284-979
Arista Records, Inc.	Kenny G	Body and Soul	Classics in the Key of G	289-898
Arista Records, Inc.	Kenny G	Brahms Lullaby	Miracles: The Holiday Album	206-848
Arista Records, Inc.	Run DMC	Walk This Way	Raising Hell	124-846
Arista Records, Inc.	Santana feat. Rob Thomas	Smooth	Supernatural	289-833
Arista Records, Inc.	Whitney Houston	Why Does It Hurt So Bad	Waiting to Exhale (O.S.T.)	219-539
Atlantic Recording Corporation	Alphaville	Forever Young	Forever Young	57-138
Atlantic Recording Corporation	Bad Religion	A Streetkid Named Desire	New America	284-353
Atlantic Recording Corporation	Collective Soul	You Speak My Language	Blender	303-603
Atlantic Recording Corporation	Deborah Morgan	Dance With Me	Dance with Me	303-745
Atlantic Recording Corporation	Jewel	Amen	Pieces of You	198-481
Atlantic Recording Corporation	John Michael Montgomery	How Was I to Know	What I Do Best	227-360
Atlantic Recording Corporation	Junior Mafia	Get Money (remix)	Conspiracy	225-941
Atlantic Recording Corporation	Matchbox 20	Push	Yourself or Someone Like You	227-755
Atlantic Recording Corporation	matchbox twenty	The Burn	Mad Season	305-708
Atlantic Recording Corporation	MC Lyte	Ruffneck	Ain't No Other	168-042
Atlantic Recording Corporation	OPM	Heaven is a Halfpipe	Menace to Sobriety	303-751
Atlantic Recording Corporation	Phil Collins	Another Day in Paradise	But Seriously	110-770
Atlantic Recording Corporation	Phil Collins	In The Air Tonight	Face Value	24-682
Atlantic Recording Corporation	Sister Sledge	We Are Family	We Are Family	6-182
BMG Music	Christina Aguilera	Genie In A Bottle	Christina Aguilera	274-004

Schedule A

Capitol Records, Inc.	Arrested Development	People Everyday	3 Years, 5 Months & 2 Days in the Life of...	143-502
Capitol Records, Inc.	Beastie Boys	Intergalactic	Hello Nasty	277-731
Capitol Records, Inc.	Beastie Boys	Get It Together	Ill Communication	213-461
Capitol Records, Inc.	Billy Idol	Dancing With Myself	Billy Idol	39-673
Capitol Records, Inc.	Billy Idol	Rebel Yell	Rebel Yell	52-131
Capitol Records, Inc.	Blondie	Heart of Glass	Parallel Lines	4-090
Capitol Records, Inc.	Blur	Beetlebum	Blur	231-938
Capitol Records, Inc.	Bob Seger & The Silver Bullet Band	Against The Wind	Against the Wind	17-910
Capitol Records, Inc.	Bonnie Raitt	Something To Talk About	Luck of the Draw	133-193
Capitol Records, Inc.	Duran Duran	Wild Boys	Arena	58-461
Capitol Records, Inc.	Enanitos Verdes	Lamento Boliviano	Big Bang	223-919
Capitol Records, Inc.	Everclear	El Distorto De Melodica	So Much for the Afterglow	181-328
Capitol Records, Inc.	Everclear	Brown Eyed Girl	Songs from an American Movie,	284-811
Capitol Records, Inc.	Everclear	Wonderful	Songs from an American Movie,	
Capitol Records, Inc.	Everclear	Santa Monica	Vol. 1: Learning How to Smile	284-811
Capitol Records, Inc.	George Clinton	Atomic Dog	Sparkle and Fade	279-015
Capitol Records, Inc.	Keith Urban	Where the Blacktop Ends	Computer Games	43-549
Capitol Records, Inc.	Kim Wilde	Kids In America	Keith Urban	273-265
Capitol Records, Inc.	Los Angeles Negros	Dejenime si estoy llorando	Kim Wilde	33-474
Capitol Records, Inc.	Marcy Playground	Sex and Candy	20 Exitos Originales	47-619
Capitol Records, Inc.	Norah Jones	Cold Cold Heart	Marcy Playground	240-954
Capitol Records, Inc.	Norah Jones	Come Away With Me	Come Away With Me	320-120
Capitol Records, Inc.	Norah Jones	Shoot the Moon	Come Away With Me	320-120
Capitol Records, Inc.	Alana Davis	32 Flavors	Come Away With Me	320-120
Capitol Records, Inc.	Better Than Ezra	Happy endings	Blame It On Me	245-201
Capitol Records, Inc.	Better Than Ezra	Live Again	Friction, Baby	225-706
Capitol Records, Inc.	Bjork	5 years	How Does Your Garden Grow	254-236
Capitol Records, Inc.	Bjork	hyperballad	Homogenic	245-199
Capitol Records, Inc.	Brand Nubian (Feat. People Under the Stairs)	Punks Jump Up To Get Beat Down (Remix)	Post	206-712
Capitol Records, Inc.	Busta Rhymes	Salute Da Gods!!!	In God We Trust	152-095
Capitol Records, Inc.	Busta Rhymes	Flipmode Squad Meets Def Squad	Anarchy	281-391
Capitol Records, Inc.	Busta Rhymes	Put Your Hands Where My Eyes Could Riddle	The Coming	225-703
Capitol Records, Inc.	En Vogue	Everybody On The Line Outside	When Disaster Strikes	258-724
Capitol Records, Inc.	Flipmode Squad		Masterpiece Theatre	267-231
Capitol Records, Inc.	Flipmode Squad		Imperial Album	254-201

Schedule A

Elektra Entertainment Group Inc.	Jackson Browne	Everywhere I Go	I'm Alive	193-976
Elektra Entertainment Group Inc.	Keith Sweat	Make It Last Forever	Make It Last Forever	86-761
Elektra Entertainment Group Inc.	MC Lyte & Xscape	Keep On Keepin On	Bad as I Wanna B	225-726
Fonovisa, Inc.	Los Tigres Del Norte	El Circo	Unidos Para Siempre	221-706
Fonovisa, Inc.	Marco Antonio Solis	Si No Te Hubieras Ido	En Vivo	310-301
Fonovisa, Inc.	Marco Antonio Solis	La Venia Bendita	Marco Antonio Solis	249-031
Interscope Records	Blackstreet with Fishbone, Slash, and ODB	Fix (remix)	Another Level	229-817
Interscope Records	Brian Setzer Orchestra	Jump, Jive, An' Wail	The Dirty Boogie	256-074
Interscope Records	Dr. Dre	XXPLOSIVE	2001	277-983
Interscope Records	Eminem	Amityville	The Marshall Mathers LP	287-944
Interscope Records	Eminem	Soap	The Slim Shady LP	262-686
Interscope Records	Enrique Iglesias	Bailamos	Enrique	214-257
Interscope Records	Eve	Scenario 2000	Let there Be Eve... Ruff Ryder's	265-925
Interscope Records	Limp Bizkit	9 Teen 90 Nine	Significant Other	279-827
Interscope Records	Mya	Movin On	Mya	255-973
Interscope Records	No Doubt	Artificial Sweetener	Return of Saturn	279-727
Interscope Records	No Doubt	You Can Do It	Tragic Kingdom	206-724
Interscope Records	Ruff Ryders	Down Bottom	Ruff Ryders Ride or Die Vol. 1	179-239
Interscope Records	Smash Mouth	Waste	Astro Lounge	264-519
Interscope Records	Smash Mouth	Walkin' on the Sun	Fush Yu Mang	238-756
Interscope Records	Wallflowers	Birdcage	Breach	214-646
London-Sire Records Inc.	Devo	Whip It	Freedom of Choice	17-936
London-Sire Records Inc.	The Smiths	Bigmouth Strikes Again	The Queen is Dead	75-732
London-Sire Records Inc.	The Smiths	This Charming Man	The Smiths	53-381
London-Sire Records Inc.	Tom Tom Club	Genius Of Love	Tom Tom Club	30-019
Loud Records LLC	Big Pun	Still Not A Player	Capitol Punishment	260-263
Loud Records LLC	Mobb Deep	Where Ya Heart At	Murda Muzik	293-229
Loud Records LLC	Xzibit feat. Alkaholiks and	Let It Rain	40 Dayz and 40 Nightz	246-589
Maverick Recording Company	Alanis Morissette	You Oughta Know	Jagged Little Pill	213-545
Maverick Recording Company	Candlebox	Far Behind	Candlebox	171-393
Maverick Recording Company	Deftones	Be Quiet and Drive	Around the Fur	244-493
Maverick Recording Company	Erasure	In My Arms	Cowboy	235-192
Motown Record Company, L.P.	702	Where My Girls At	702	279-470
UMG Recordings, Inc.	98 Degrees	The Invisible Man	98 Degrees	249-152
Motown Record Company, L.P.	Boyz II Men	Under Pressure	Cooleyhighharmony	212-333
Motown Record Company, L.P.	Boyz II Men	Yesterday	II	196-004

Schedule A

Motown Record Company, L.P.	BoyzIIMen	4 Seasons of Loneliness	Evolution	240-088
Motown Record Company, L.P.	Brian McKnight	Back At One	Back At One	279-471
Motown Record Company, L.P.	Erykah Badu	Orange Moon	Mama's Gun	295-614
Motown Record Company, L.P.	Lionel Richie	All Night Long	Can't Slow Down	49-235
Motown Record Company, L.P.	Mary Jane Girls	All Night Long	Mary Jane Girls	44-100
Motown Record Company, L.P.	Rick James	Fire and desire	Street Songs	25-800
Sony Music Entertainment Inc.	Allure	All Cried Out	Allure	241-069
Sony Music Entertainment Inc.	Babyface	You Are So Beautiful	For the Cool in You	184-540
Sony Music Entertainment Inc.	Babyface f. LL Cool J &	This Is For The Lover In You	The Day	231-025
Sony Music Entertainment Inc.	Berlin	Take My Breath Away	Top Gun Soundtrack	76-600
Sony Music Entertainment Inc.	Billy Joel	An Innocent Man	An Innocent Man	47-532
Sony Music Entertainment Inc.	Billy Joel	You May Be Right	Glass Houses	17-630
Sony Music Entertainment Inc.	Bone Thugs-N-Harmony feat.	Thug Luv	Art of War	240-553
Sony Music Entertainment Inc.	Bonnie Tyler	Total Eclipse of the Heart	Faster than the Speed of Night	50-641
Sony Music Entertainment Inc.	Bruce Springsteen	Working On The Highway	Born in the U.S.A.	55-647
Sony Music Entertainment Inc.	Bruce Springsteen	Secret Garden	Greatest Hits	198-948
Sony Music Entertainment Inc.	Bruce Springsteen	Streets of Philadelphia	Greatest Hits	198-948
Sony Music Entertainment Inc.	Candyman	Knockin Boots	Ain't No Shame in My Game	125-183
Sony Music Entertainment Inc.	Celine Dion and Peabo	Beauty And The Beast	Celine Dion	144-117
Sony Music Entertainment Inc.	Collin Raye	Little Red Rodeo	Best of Collin Raye: Direct Hits	243-637
Sony Music Entertainment Inc.	Cyndi Lauper	Time After Time	She's So Unusual	50-827
Sony Music Entertainment Inc.	Da Brat	Funkdafied	Funkdafied	199-136
Sony Music Entertainment Inc.	Kenny Loggins	Danger zone	Top Gun Soundtrack	76-600
Sony Music Entertainment Inc.	Meat Loaf	Heaven Can Wait	Bat Out of Hell	N46849
UMG Recordings, Inc.	3 Doors Down	So I Need You	The Better Life	277-407
UMG Recordings, Inc.	98 Degrees	Give Me Just One Night (Una Noche)	Revelation	270-025
UMG Recordings, Inc.	Beck	Loser	Mellow Gold	185-369
UMG Recordings, Inc.	Beck	Pressure Zone	Midnite Vultures	276-479
UMG Recordings, Inc.	Beck	Sexxlaws	Midnite Vultures	276-479
UMG Recordings, Inc.	Beck	Derelect	Odelay	222-917
UMG Recordings, Inc.	Berlin	The Metro	Pleasure Victim	43-664
UMG Recordings, Inc.	Billie Myers	Kiss the Rain	Growing Pains	251-956
UMG Recordings, Inc.	Blink-182	Dammit	Dude Ranch	243-969
UMG Recordings, Inc.	Blink-182	All the Small Things	Enema of the State	279-826
UMG Recordings, Inc.	Bloodhound Gang	A Lap Dance Is So Much Better When	Hooray for Boobies	278-185
UMG Recordings, Inc.	Bobby Brown	Roni	Don't Be Cruel	93-332
UMG Recordings, Inc.	Bon Jovi	Two Story Town	Crush	281-803

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UMG Recordings, Inc.	Bon Jovi	Never Say Goodbye	Slippery when Wet	71-794
UMG Recordings, Inc.	Dimstore Hoods (Limp Bizkit)	Blood in my Eyes	Dimstore Hoods	222-694
UMG Recordings, Inc.	U2	Kite	All that You Can't Leave Behind	294-631
UMG Recordings, Inc.	U2	Exit	Joshua Tree	78-949
UMG Recordings, Inc.	U2	Red Hill Mining Town	The Joshua Tree	78-949
Virgin Records America, Inc.	A Perfect Circle	Brena	Mer De Noms	281-642
Virgin Records America, Inc.	After 7	Ready or Not	After 7	112-721
Virgin Records America, Inc.	Beenie Man	Crazy Notion	Art and Life	284-383
Virgin Records America, Inc.	Ben Harper	Alone	Burn to Shine	273-400
Virgin Records America, Inc.	Ben Harper	God Fearing Man	Fight for Your Mind	210-135
Virgin Records America, Inc.	Ben Harper	Oppression	Fight for Your Mind	210-135
Virgin Records America, Inc.	Cracker	Get off this	Kerosene Hat	175-493
Virgin Records America, Inc.	Cutting Crew	I Just Died in Your Arms	Broadcast	83-806
Virgin Records America, Inc.	Divinyls	I Touch Myself	Divinyls	127-625
Virgin Records America, Inc.	Enigma	Beyond the Invisible	Le Roi Est Mort, Vive Le Roi	229-049
Virgin Records America, Inc.	Enigma	Back to the Rivers of Belief	MCMXC A.D.	126-800
Virgin Records America, Inc.	Enigma	Silence Must be Heard	Screen Behind the Mirror	277-091
Virgin Records America, Inc.	Ideal	Break Your Plans	Ideal	273-905
Virgin Records America, Inc.	Janet Jackson	Would You Mind	All For You	308-900
Virgin Records America, Inc.	Janet Jackson	Again	Janet	174-392
Virgin Records America, Inc.	Kelis	Caught Out There	Kaleidoscope	277-087
Warner Bros. Records Inc.	Barenaked Ladies	Too Little Too Late	Maroon	288-335
Warner Bros. Records Inc.	Barenaked Ladies	One Week	Stunt	257-724
Warner Bros. Records Inc.	Bette Midler	In These Shoes	Bette	288-332
Warner Bros. Records Inc.	Chris Isaak	Wicked Game	Heart Shaped World	107-765
Warner Bros. Records Inc.	Depeche Mode	Master and Servant	Some Great Reward	58-033
Warner Bros. Records Inc.	Dire Straits	Brothers in Arms	Brothers in Arms	63-040
Warner Bros. Records Inc.	Enya	Wild Child	A Day Without Rain	290-690
Warner Bros. Records Inc.	Eric Clapton & B.B. King	Come Rain or Come Shine	Riding with the King	285-808
Warner Bros. Records Inc.	Faith Hill	Breathe	Breathe	276-629
Warner Bros. Records Inc.	Faith Hill With Tim Mcgraw	Just to Hear you say that You Love Me	Faith	253-752
Warner Bros. Records Inc.	Filter	Take a Picture	Title of Record	270-763
Warner Bros. Records Inc.	Geggy Tah	Whoever You Are	Sacred Cow	220-625
Warner Bros. Records Inc.	Goo Goo Dolls	Naked	A Boy Named Goo	193-623
Warner Bros. Records Inc.	Goo Goo Dolls	Black Balloon	Dizzy up the Girl	246-538
Warner Bros. Records Inc.	Green Day	Burnout	Dookie	185-457
Warner Bros. Records Inc.	Green Day	When I Come Around	Dookie	185-457

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Warner Bros. Records Inc.	Linkin Park	With You	Hybrid Theory	288-402
Warner Bros. Records Inc.	Madonna	Take A Bow	Bedtime Stories	200-082
Warner Bros. Records Inc.	Madonna	Express Yourself	Like a Prayer	106-808
Warner Bros. Records Inc.	Madonna	Dress You Up (in my love)	Like a Virgin	59-442
Warner Bros. Records Inc.	Madonna	Burning Up	Madonna	46-877
Warner Bros. Records Inc.	Madonna	Amazing	Music	285-828
Warner Bros. Records Inc.	Red Hot Chili Peppers	Californication	Californication	174-922
Zomba Recording Corporation	Backstreet Boys	How Did I Fall In Love With You	Black & Blue	289-455
Zomba Recording Corporation	Britney Spears	From the Bottom of My Broken Heart	Baby One More Time	260-870
Zomba Recording Corporation	Britney Spears	Stronger	Oops!...I Did It Again	285-667
Zomba Recording Corporation	Joe	Stutter	My Name Is Joe	300-857
Zomba Recording Corporation	N Sync	Bye Bye Bye	No Strings Attached	284-595
Zomba Recording Corporation	N Sync	It Makes Me Ill	No Strings Attached	284-595