



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 Michigan Technological 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, "[www.mtu.flatlan.com](http://www.mtu.flatlan.com)," 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, Janet Jackson, U2, Christina Aguilera, Billy Joel, Dave Matthews Band and Britney Spears.

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 Christina Aguilera, Queen, Weezer, Korn and the Eurythmics.

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 the State of Michigan.

9. Venue is proper in this District under 28 U.S.C. section 1400(a) because Defendant resides in Houghton, Michigan on the campus of Michigan Technical University.

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

16. 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.

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

19. Plaintiff Priority Records, LLC is a limited liability company duly organized and existing under the laws of the State of Delaware, with its principal place of business in California.

20. 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.

21. 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.

22. 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.

23. 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.

24. 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.

25. Defendant Joseph Nievelt is an individual who is currently a student at Michigan Technology University and whose domicile is in Royal Oak, Michigan.

## **PLAINTIFFS' BUSINESS**

26. 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.

27. 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.

28. 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

29. 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 access to a university Local Area Network, or "LAN."

30. 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.

31. 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% 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.

32. In part, at least, because such restrictions limit the ability of university network users to illegally copy music and other copyrighted material 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.

33. 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**

34. Defendant created a system that is designed to enable and facilitate the widespread unauthorized copying and distribution of sound recordings over Michigan

Technological 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.

35. Defendant further has established and maintains an Internet site accessible over the World Wide Web at the URL <http://www.mtu.flatlan.com/>. 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.

36. 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.

37. Defendant is well aware of the widespread piracy of copyrighted recordings over his system. Defendant's web site even promoted his service as a source of copyrighted song recordings. To demonstrate how his system can be used, the web site displayed the search results of MP3 files and highlighted a recording by the popular artist Three Doors Down that was available for download. Three Doors Down is a well known artist signed to UMG Recordings, Inc., one of the Plaintiffs. 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. Using Defendant's own web site, Plaintiffs obtained a list of files that Defendant himself offers to others. Those files include the titles of hundreds of copyrighted works owned by Plaintiffs, including works by Christina Aguilera, Queen, Weezer, Korn and the Eurythmics.

38. 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 the Michigan Technological 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, Janet Jackson, U2, Christina Aguilera, Billy Joel, Dave Matthews Band and Britney Spears.

39. Defendant's unlawful conduct does not end there, however. Defendant himself is distributing hundreds of copyrighted sound recordings without authorization that, Plaintiffs allege on information and belief, 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 the Copyrighted Recordings. 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]

40. Plaintiffs incorporate herein by this reference each and every averment contained in paragraphs 1 through 39 inclusive.

41. 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.

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

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

44. 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.

45. 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).

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

47. 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]

48. Plaintiffs incorporate herein by this reference each and every averment contained in Paragraphs 1 through 39 inclusive.

49. 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.

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

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

52. 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.

53. 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).

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

55. 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.

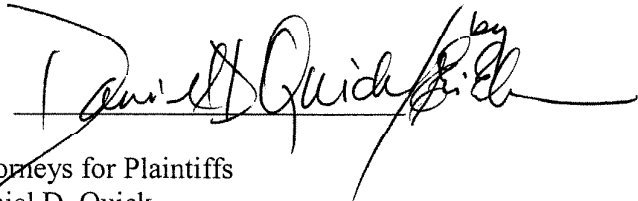
WHEREFORE, Plaintiffs pray for judgment against Defendant as follows:

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.

By: 

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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	The Sign	The Sign	169-749
Arista Records, Inc.	Air Supply	Making Love Out of Nothing at All	Making Love Out of Nothing At All (single)	46-324
Arista Records, Inc.	Alan Jackson	Chattahoochee	Lot About Livin' (And a Little 'bout Love)	147-716
Arista Records, Inc.	Alan Jackson	Where I Come From	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.	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.	Kenny G	Stranger on the Shore	Classics in the Key of G	289-898
Arista Records, Inc.	Koffee Brown	After Party	Mars/Venus	294-728
Arista Records, Inc.	LFO	Girl On TV	LFO	306-981
Arista Records, Inc.	Next	Wifey	Welcome to Nextasy	284-980
Arista Records, Inc.	No Mercy	Where Do You Go (Ocean Drive Mix)	No Mercy	251-426
Arista Records, Inc.	Outkast	West Savannah	Aquemini	264-092
Arista Records, Inc.	Outkast	You May Die (Intro)	ATLiens	233-296
Arista Records, Inc.	Outkast	Xplosion	Stankonia	306-741
Arista Records, Inc.	Phil Vassar	Six-Pack Summer	Phil Vassar	284-145
Arista Records, Inc.	Pink	Do What U Do	Can't Take Me Home	279-958
Arista Records, Inc.	Robert Miles	One and one	Dreamland	225-337
Arista Records, Inc.	Run DMC	Walk This Way	Raising Hell	124-846
Arista Records, Inc.	Santana feat. Eagle-Eye Cherry	Wishing It Was	Supernatural	289-833
Arista Records, Inc.	Sarah McLachlan	Adia	Surfacing	243-027
Arista Records, Inc.	Snap	Rhythm is a Dancer	The Madman's Return	144-133
Arista Records, Inc.	Thompson Twins	Hold Me Now	Into the Gap	52-747
Arista Records, Inc.	TLC	Waterfalls	CrazySexyCool	198-743
Arista Records, Inc.	TLC	Unpretty	Fanmail	298-454
Atlantic Recording Corporation	Bad Religion	1000 memories	New America	284-353
Atlantic Recording Corporation	Bad Religion	American Jesus	Recipe for Hate	172-147
Atlantic Recording Corporation	Collective Soul	You Speak My Language	Blender	303-603
Atlantic Recording Corporation	Collective Soul	Shine	Hints, Allegations and Things Left Unsaid	187-499
Atlantic Recording Corporation	Confederate Railroad	Keep On Rockin'	Keep on Rockin'	237-719
Atlantic Recording Corporation	Foreigner	Waiting for a Girl Like You	Foreigner 4	27-769
Atlantic Recording Corporation	Genesis	Mama	Genesis	49-248

Schedule A

Atlantic Recording Corporation	Jewel	Adrian	Pieces of You	198-481
Atlantic Recording Corporation	Junior Mafia	Get Money	Conspiracy	225-941
Atlantic Recording Corporation	Matchbox 20	Argue	Yourself or Someone Like You	227-755
Atlantic Recording Corporation	matchbox twenty	The Burn	Mad Season	305-708
Atlantic Recording Corporation	Neal Mccoy	The Shake	Be Good at It	243-513
Atlantic Recording Corporation	OPM	Better Daze	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	Phil Collins	Who Said I Would	No Jacket Required	60-788
Atlantic Recording Corporation	Sister Sledge	We are Family	We Are Family	6-182
Atlantic Recording Corporation	Sugar Ray	Someday	14:59	262-149
Atlantic Recording Corporation	Sugar Ray	Fly	Floored	208-769
Atlantic Recording Corporation	Tori Amos	Cornflake Girl	Under the Pink	185-391
BMG Music	Bruce Hornsby	The Way It Is	The Way It Is	71-024
BMG Music	Christina Aguilera	What A Girl Wants	Christina Aguilera	274-004
BMG Music	Christina Aguilera	These are the special times	My Kind of Christmas	271-461
BMG Music	Dave Matthews Band	Crush	Before These Crowded Streets	257-982
BMG Music	Dave Matthews Band	Two Step	Crash	212-572
BMG Music	Dave Matthews Band	Angel	Everyday	300-313
BMG Music	Dave Matthews Band	What Would You Say	Under the Table and Dreaming	285-688
BMG Music	David Gray	Babylon	White Ladder	297-324
BMG Music	Eurythmics	Here Comes the Rain Again	Touch	52-363
BMG Music	Eve	Inside Out	Eve 6	257-983
BMG Music	Eve	Open Road Song	Eve 6	257-983
BMG Music	Eve	Amphetamines	Horrorscope	285-024
BMG Music	Foo Fighters	Breakout	There Is Nothing to Lose	285-034
BMG Music	Lonestar	Not A Day Goes By	I'm Already There	298-550
BMG Music	Lou Bega	Mambo No 5	Lou Bega - Mambo No 5	286-646
BMG Music	Republica	Ready to Go	Republica	224-451
BMG Music	SR-71	Alive	Now You See Inside	283-812
BMG Music	SR-71	Another Night Alone	Now You See Inside	283-812
BMG Music	SWV	Right Here	Its About Time	146-905
BMG Music	The Verve Pipe	Photograph	Villians	219-544
BMG Music	Tyrese	Lately	Tyrese	237-788
BMG Music	Vertical Horizon	You Say	Everything You Want	277-868
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	Hearts Of Glass	Parallel Lines	4-090

Schedule A

Capitol Records, Inc.	Bob Seger	Against The Wind	Against the Wind	17-910
Capitol Records, Inc.	Duran Duran	Wild Boys	Arena	58-461
Capitol Records, Inc.	Everclear	Everything To Everyone	So Much For the Afterglow	181-328
Capitol Records, Inc.	Everclear	Wonderful	Songs from an American Movie, Vol. 1: Learning How to Smile	284-811
Capitol Records, Inc.	Everclear	Halloween Americana	Songs from an American Movie, Vol. 2: Good Time for a Bad Attitude	295-621
Capitol Records, Inc.	Everclear	Santa Monica	Sparkle and Fade	279-015
Capitol Records, Inc.	Keith Urban	Where The Blacktop Ends	Keith Urban	273-265
Capitol Records, Inc.	Marcy Playground	Sex and Candy	Marcy Playground	240-954
Capitol Records, Inc.	MC Hammer	Too Legit To Quit	Too Legit to Quit	136-387
Capitol Records, Inc.	Megadeth	Symphony of Destruction	Countdown to Extinction	175-385
Capitol Records, Inc.	Megadeth	Almost Honest	Cryptic Writings	179-457
Capitol Records, Inc.	Megadeth	Hangar 18	Peace Sells...But Who's Buying So Far?	81-043
Capitol Records, Inc.	Megadeth	Dawn Patrol	Rust in Peace	125-168
Capitol Records, Inc.	Megadeth	Tout Le Monde	Youthanasia	258-062
Capitol Records, Inc.	Mercy Brooks	Bitch	Blurring the Edges	181-390
Capitol Records, Inc.	Poison	Something To Believe In	Flesh and Blood	119-355
Capitol Records, Inc.	Poison	Every Rose Has Its Thorn	Open Up and Say...Ahh!	93-741
Capitol Records, Inc.	Poison	Fallen Angel	Open Up and Say...Ahh!	93-741
Capitol Records, Inc.	Radiohead	Everything In Its Right Place	Kid A	289-381
Capitol Records, Inc.	Radiohead	Creep	Pablo Honey	190-976
Capitol Records, Inc.	Radiohead	Sulk	The Bends	280-260
Capitol Records, Inc.	Red Hot Chili Peppers	Higher Ground	Mother's Milk	107-737
Capitol Records, Inc.	Robbie Williams	Millenium	The Ego Has Landed	174-566
Capitol Records, Inc.	White Town	Your Woman	Women in Technology	231-659
Elektra Entertainment Group Inc.	Bjork	Cover Me	Telegram	235-219
Elektra Entertainment Group Inc.	Bjork	5 Years	Homogenic	245-199
Elektra Entertainment Group Inc.	Busta Rhymes	Dangerous	When Disaster Strikes	258-724
Elektra Entertainment Group Inc.	Moby	James Bond Theme (Techno Remix)	I Like to Score	252-365
Elektra Entertainment Group Inc.	Natalie Cole feat. Nat King Cole	Unforgettable	Unforgettable: With Love	138-520
Elektra Entertainment Group Inc.	Pantera	Up Life	Reinventing the Steel	267-228
Elektra Entertainment Group Inc.	The Cars	Shake It Up	Shake It Up	32-055
Elektra Entertainment Group Inc.	The Cars	Just What I Needed	The Cars	4-128
Elektra Entertainment Group Inc.	The Cure	Love Song	Disintegration	104-305
Elektra Entertainment Group Inc.	The Cure	Just Like Heaven	Kiss Me, Kiss Me, Kiss Me	82-714
Elektra Entertainment Group Inc.	The Cure	Close To Me	The Head on the Door	65-872

Schedule A

Elektra Entertainment Group Inc.	Third Eye Blind	How's It Gonna Be	Third Eye Blind	188-673
Elektra Entertainment Group Inc.	Tracy Chapman	Telling Stories	Telling Stories	278-226
Elektra Entertainment Group Inc.	Tracy Chapman	Fast Car	Tracy Chapman	92-491
Elektra Entertainment Group Inc.	Vast	Free	Music for People	267-227
Interscope Records	Limp Bizkit	My Way	Chocolate Starfish and the Hot Dog Flavored Water	214-636
Interscope Records	Limp Bizkit	Nookie	Significant Other	279-827
Interscope Records	The Hippos	Lost It	Heads are Gonna Roll	269-481
Interscope Records	Unwritten Law	Harmonic	Unwritten Law	256-096
Lava Records LLC	Uncle Kracker	Follow Me	Double Wide	284-346
Lava Records LLC	Uncle Kracker	Whiskey & Walter	Double Wide	284-346
Loud Records LLC	Big Punisher	Still Not a Player	Capital Punishment	260-263
Maverick Recording Company	Candlebox	You	Candlebox	171-393
Maverick Recording Company	Deftones	Be Quiet and Drive	Around the Fur	244-493
Priority Records LLC	Ice Cube	Down For Whatever	Lethal Injection	198-283
Priority Records LLC	Ice Cube	When Will They Shoot	The Predator	169-617
Priority Records LLC	Ice Cube	Ghetto Vet	The War Disc	268-428
Priority Records LLC	NWA	Fuck the Police	Straight Outta Compton	150-531
Sony Music Entertainment Inc.	Babyface	Every Time I Close My Eyes	The Day	231-025
Sony Music Entertainment Inc.	Babyface	Whip Appeal	Tender Lover	106-822
Sony Music Entertainment Inc.	Billy Joel	An Innocent Man	A Innocent Man	47-532
Sony Music Entertainment Inc.	Billy Joel	You May Be Right	Glass Houses	17-630
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	Dancing In The Dark	Born in the USA	55-647
Sony Music Entertainment Inc.	Bruce Springsteen	Streets Of Philadelphia	Greatest Hits	198-948
Sony Music Entertainment Inc.	Celine Dion	The Power Of Love	Colour of My Love	191-558
Sony Music Entertainment Inc.	Celine Dion	All By Myself	Falling Into You	224-159
Sony Music Entertainment Inc.	Celine Dion & Peabo Bryson	Beauty And The Beast	Celine Dion	144-117
Sony Music Entertainment Inc.	Charlie Daniels	In America	Full Moon	20-167
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.	Cypress Hill feat Fugees	Boom Biddy Bye Bye	Cypress Hill III: Temples of Boom	215-690
Sony Music Entertainment Inc.	Dixie Chicks	Cowboy Take Me Away	Fly	275-086
Sony Music Entertainment Inc.	Dixie Chicks	Wide Open Spaces	Wide Open Spaces	252-000
Sony Music Entertainment Inc.	Dixie Chicks	Without You	Fly	275-086
Sony Music Entertainment Inc.	George Michael	Faith	Faith	92-432
Sony Music Entertainment Inc.	Incubus	Drive	Make Yourself	278-818
Sony Music Entertainment Inc.	John Forte	Ninety Nine	Poly Sci	263-451
Sony Music Entertainment Inc.	Journey	Open Arms	Escape	30-088
Sony Music Entertainment Inc.	Journey	Separate Ways (Worlds Apart)	Frontiers	43-223

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Sony Music Entertainment Inc.	Korn	Got The Life	Follow the Leader	263-749
Sony Music Entertainment Inc.	Korn	Blind	Korn	201-939
Sony Music Entertainment Inc.	Lauryl Hill	Everything Is Everything	The Miseducation of Lauryn Hill	254-183
Sony Music Entertainment Inc.	Mariah Carey	Heartbreaker [Remix]	Rainbow	276-595
UMG Recordings, Inc.	Lee Ann Womack	Lonely Too	I Hope You Dance	281-198
UMG Recordings, Inc.	Shania Twain	Don't Be Stupid (You Know I Love You)	Come On Over	276-692
UMG Recordings, Inc.	Sting	Desert Rose	Brand New Day	271-015
UMG Recordings, Inc.	Sting	Fields of Gold	Ten Summoner's Tales	174-453
UMG Recordings, Inc.	U2	Beautiful Day	All that You Can't Leave Behind	294-631
UMG Recordings, Inc.	U2	Red Hill Mining Town	The Joshua Tree	78-949
UMG Recordings, Inc.	U2	Still Haven't Found What I'm Looking For	The Joshua Tree	78-949
UMG Recordings, Inc.	Weezer	Across the Sea	Pinkerton	226-562
UMG Recordings, Inc.	Weezer	Falling for You	Pinkerton	226-562
UMG Recordings, Inc.	Weezer	Undone (The Sweater Song)	Weezer	187-644
UMG Recordings, Inc.	Weezer	Island in the Sun	Weezer (Green Album)	297-030
Virgin Records America, Inc.	A Perfect Circle	Brena	Mer de Norms	281-642
Virgin Records America, Inc.	Ben Harper	Burn One Down	Fight for Your Mind	210-135
Virgin Records America, Inc.	Blur	Song 2	Blur	231-938
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.	Janet Jackson	Son Of A Gun (Bet You Think This Song Is About You)	All for You	308-900
Virgin Records America, Inc.	Janet Jackson	If	Janet	174-392
Virgin Records America, Inc.	Paula Abdul	Straight Up	Forever Your Girl	93-688
Virgin Records America, Inc.	Paula Abdul	Vibeology	Spellbound	129-900
Virgin Records America, Inc.	Shaggy	Boombastic	Boombastic	222-048
Virgin Records America, Inc.	Steve Winwood	Roll With It	Roll With It	93-680
Virgin Records America, Inc.	The Smashing Pumpkins	Annie-Dog	Adore	261-479
Virgin Records America, Inc.	The Smashing Pumpkins	The Everlasting Gaze	MACHINA/The Machines of God	278-424
Virgin Records America, Inc.	The Smashing Pumpkins	1979	Mellon Collie and the Infinite	183-904
Virgin Records America, Inc.	The Smashing Pumpkins	Landslide	Sadness	201-728
Virgin Records America, Inc.	The Smashing Pumpkins	Cherub Rock	Pisces Iscariot	169-635
Virgin Records America, Inc.	UB40	Red, Red Wine	Labour of Love	49-244
Virgin Records America, Inc.	Yanni	On Sacred Ground	If I Could Tell You	287-288
Warner Bros. Records Inc.	A-Ha	Take On Me	Hunting High and Low	63-603
Warner Bros. Records Inc.	Bareraked Ladies	The Old Apartment	Born on a Pirate Ship	261-190
Warner Bros. Records Inc.	Bareraked Ladies	Too Little Too Late	Maroon	288-335
Warner Bros. Records Inc.	Bareraked Ladies	One Week	Stunt	257-724
Warner Bros. Records Inc.	Chris Isaak	Wicked Game	Heart Shaped World	107-765

Schedule A

Warner Bros. Records Inc.	Devo	Whip It	Freedom of Choice	17-936
Warner Bros. Records Inc.	Dire Straits	Brothers in Arms	Brothers in Arms	63-040
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	Material Girl	Like a Virgin	59-442
Zomba Recorcing Corporation	Britney Spears	I'm a Slave 4 U	Britney	301-907
Zomba Recorcing Corporation	Britney Spears	I'm Not A Girl, Not Yet A Woman	Britney	301-907
Zomba Recorcing Corporation	Britney Spears	That's Where You Take Me	Britney	301-907
Zomba Recorcing Corporation	N Sync	Girlfriend	Celebrity	303-730
Zomba Recorcing Corporation	N Sync	Pop	Celebrity	303-730
Zomba Recorcing Corporation	N Sync	Bye Bye Bye	No Strings Attached	284-595
Zomba Recorcing Corporation	N Sync	No Strings Attached	No Strings Attached	284-595