

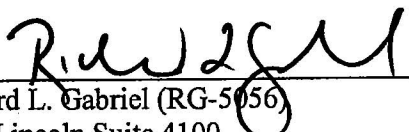
**REQUEST FOR PRODUCTION OF DOCUMENTS NO. 4: All other
DOCUMENTS CONCERNING any registration by any employee of plaintiffs as a user of
any ONLINE MEDIA DISTRIBUTION SYSTEM.**

SUPPLEMENTAL RESPONSE: Plaintiffs object to this Request on the grounds that such a request would seek documents that are not relevant to the claim or defense of any party, are not relevant to the subject matter involved in this action, and are not reasonably calculated to lead to the discovery of admissible evidence. Plaintiffs also object to this Request on the grounds that it is overly broad and unduly burdensome, because Plaintiffs have thousands of employees scattered all over the world. Plaintiffs further object to this Request on the grounds that it calls for documents protected by the attorney-client privilege and/or the work product doctrine.

Subject to and without waiving any objections made herein, and pursuant to this Court's July 25, 2006 bench order narrowing this Request to require Plaintiffs to produce documents concerning their use of file-sharing programs such as Kazaa to provide music to radio stations, Plaintiffs state that they have not used file-sharing programs such as Kazaa to provide music to radio stations and, thus, have no documents in their possession, custody, or control that are responsive to this Request.

Dated: New York, New York
August 24, 2006

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