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8 WARNER BROS. RECORDS INC., ATLANTIC
RECORDING CORPORATION, ELEKTRA
9 ENTERTAINMENT GROUP INC., and RHINO
ENTERTAINMENT COMPANY

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA

13 WARNER BROS. RECORDS INC.,
14 ATLANTIC RECORDING
CORPORATION, ELEKTRA
15 ENTERTAINMENT GROUP INC.,
and RHINO ENTERTAINMENT
16 COMPANY,

17 Plaintiffs,

18 vs.

19 SEEQPOD, INC.

20 Defendant.

CASE NO.

CV08-00335DDP PLA
**COMPLAINT FOR DIRECT,
CONTRIBUTORY, AND
VICARIOUS COPYRIGHT
INFRINGEMENT, INDUCEMENT
OF COPYRIGHT INFRINGEMENT,
MISAPPROPRIATION AND
UNFAIR COMPETITION**

DEMAND FOR JURY TRIAL

21 This Court has original subject matter jurisdiction over all claims pursuant to
22 28 U.S.C. §§ 1331 and 1338(a), and supplemental jurisdiction over Plaintiffs'
23 claims arising under state law under 28 U.S.C. § 1367. Plaintiffs Warner Bros.
24 Records Inc., Atlantic Recording Corporation, Elektra Entertainment Group Inc.,
25 and Rhino Entertainment Company ("Plaintiffs") allege, on personal knowledge as
26 to themselves and on information and belief as to others, as follows:
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NATURE OF ACTION

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2 1. Defendant SeeqPod, Inc. (“SeeqPod”) operates a website—
3 <http://www.seeqpod.com>—which it publicizes as the Internet’s “home for playable
4 search results,” a place where users can “crawl the deepest parts of the web” for the
5 “search & discovery of anything that can be played or shared with friends.”¹ But
6 SeeqPod is no simple search engine. SeeqPod searches for a particular type of
7 content—music—that SeeqPod knows is overwhelmingly copyrighted. The results
8 that SeeqPod returns are links—many of which SeeqPod itself solicits from its
9 users—to sites containing unauthorized and illegal copies of copyrighted music.
10 With simple clicks of a computer mouse, SeeqPod will play the work without
11 authorization; will add it to a user’s “playlist” collection; will give the user the link
12 where an unauthorized copy may be downloaded; and will embed the link on
13 social-networking sites, like MySpace and Facebook, where the entire cycle of
14 willful copyright infringement is repeated without end.

15 2. SeeqPod aims to capitalize on the illegal use of “free” music to grow
16 its user base rapidly and inexpensively. SeeqPod’s expanding user base translates
17 into more dollars in potential advertising revenue and increased corporate valuation.
18 SeeqPod has decided that the fastest—and cheapest—way to grow its user base is
19 with a practically unlimited catalogue of unauthorized sound recordings available
20 for on-demand streaming, including the unauthorized public performance of
21 massive numbers of Plaintiffs’ copyrighted works. SeeqPod directly supplants
22 legitimate contractual arrangements that exist for the authorized digital audio
23 transmission and distribution of copyrighted music, including Plaintiffs’ works.
24 SeeqPod and its “angel” investors directly profit from the mass infringement
25 occurring through its site by attracting more and more users, increasing advertising
26 revenue and the overall value of the site. In short, SeeqPod is building a business

27 ¹ http://www.seeqpod.com/frequently_asked_questions.php (last visited January 11,
28 2008).

1 on the backs of the expropriated copyrighted works of Plaintiffs and other content
2 owners.

3 3. SeeqPod's liability is clear. SeeqPod directly infringes Plaintiffs'
4 copyrighted works, including by making on-demand and unauthorized digital
5 public performances of those works. SeeqPod secondarily infringes Plaintiffs'
6 copyrights under the well-established doctrines of contributory, vicarious and
7 inducement liability. SeeqPod deliberately facilitates the rampant infringement of
8 Plaintiffs' works by its large and rapidly expanding user base and the unlawful
9 pirate sites whose links SeeqPod solicits and serves up to those users. With full
10 knowledge of the infringing conduct taking place through its site, SeeqPod makes a
11 direct and material contribution to infringing conduct, and it deliberately refrains
12 from taking simple measures to prevent further damage to Plaintiffs' copyrighted
13 works. And SeeqPod derives financial benefit from the mass infringement of
14 others' acts of infringement while declining to exercise SeeqPod's right and ability
15 to stop or limit that infringement. Plaintiffs bring this lawsuit to stop the violation
16 of Plaintiffs' copyrights and SeeqPod's unlawful business activity.

17 **JURISDICTION AND VENUE**

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

20 5. The Court has original subject matter jurisdiction over all claims
21 pursuant to 28 U.S.C. §§ 1331 and 1338(a). This Court also has supplemental
22 jurisdiction over Plaintiffs' claims arising under state law under 28 U.S.C. § 1367,
23 as those claims form part of the same case or controversy.

24 6. This Court has personal jurisdiction over SeeqPod in that, among other
25 things, SeeqPod does business in this District, and Plaintiffs do business in and are
26 suffering harm in this District.

27 7. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) and
28 (c).

THE PARTIES

1
2 8. Plaintiff Warner Bros. Records Inc. (“WBR”) is a Delaware
3 corporation with its principal place of business in Burbank, California. WBR is in
4 the business of, among other things, the distribution and sale of recorded music in
5 the form of compact discs, DVDs, digital streaming, digital downloads, and other
6 audio and audio-visual works. WBR has released albums from such prominent
7 recording artists as Madonna, Linkin Park, Eric Clapton, Cher, Red Hot Chili
8 Peppers, Fleetwood Mac, Tom Petty, Neil Young and Green Day. WBR is the
9 owner of exclusive rights under copyright for numerous sound recordings and
10 audio-visual works.

11 9. Plaintiff Atlantic Recording Corporation (“Atlantic”) is a Delaware
12 corporation with its principal place of business in New York, New York. Atlantic
13 is in the business of, among other things, the distribution and sale of recorded music
14 in the form of compact discs, DVDs, digital streaming, digital downloads, and other
15 audio and audio-visual works. Atlantic has released albums from such prominent
16 recording artists as Jewel, Genesis and Led Zeppelin. Atlantic is the copyright
17 owner of exclusive rights under copyright for numerous sound recordings and
18 audio-visual works.

19 10. Plaintiff Elektra Entertainment Group Inc. (“Elektra”) is a Delaware
20 corporation with its principal place of business in New York, New York. Elektra is
21 in the business of, among other things, the distribution and sale of recorded music
22 in the form of compact discs, DVDs, digital streaming, digital downloads, and other
23 audio and audio-visual works. Elektra has released albums from such prominent
24 recording artists as Missy Elliot, Emmylou Harris and The Cure. Elektra is the
25 copyright owner of exclusive rights under copyright for numerous sound recordings
26 and audio-visual works.

27 11. Plaintiff Rhino Entertainment Company (“Rhino”) is a Delaware
28 corporation with its principal place of business in Burbank, California. Rhino is in

1 the business of, among other things, the distribution and sale of recorded music in
2 the form of compact discs, DVDs, digital streaming, digital downloads, and other
3 audio and audio-visual works. Rhino is the copyright owner of exclusive rights
4 under copyright for numerous sound recordings and audio-visual works, including
5 works from such prominent recording artists as Chicago and Curtis Mayfield.

6 12. Plaintiffs have obtained Certificates of Copyright Registration from
7 the Register of Copyrights for their works. Attached hereto as Exhibit A is a non-
8 exhaustive, exemplary list of Plaintiffs' federally copyrighted works that SeeqPod
9 has infringed by the acts complained of herein, identifying the Certificates of
10 Copyright Registration from the Register of Copyrights for works protected by
11 federal copyright.

12 13. Plaintiffs also have entered into various agreements by which they
13 obtained the common-law copyright rights in sound recordings embodying certain
14 musical works that were initially "fixed" prior to February 15, 1972 and for which
15 Plaintiffs possess exclusive exploitation rights under state common law ("Pre-1972
16 Recordings"). Attached hereto as Exhibit B is a non-exhaustive, exemplary list of
17 Plaintiffs' Pre-1972 Recordings that are the subject of Plaintiffs' state-law claims
18 against SeeqPod.

19 14. Attached hereto as Exhibit C is a non-exhaustive, exemplary collection
20 of screenshots of search results from SeeqPod, reflecting multiple infringements by
21 and through SeeqPod of just some of the works that are the subject of this action.

22 15. Defendant SeeqPod is a Delaware corporation with its principal place
23 of business in Emeryville, California. SeeqPod was founded by Kasian Franks, Raf
24 Podowski, and Shekhar Lodha in 2005 and claims to be financed by an undisclosed
25 group of "angel" investors.² By deliberately underwriting an enterprise whose

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27 ²
28 [http://home.businesswire.com/portal/site/google/index.jsp?ndmViewId=news_view
&newsId=20070725005391&newsLang=en](http://home.businesswire.com/portal/site/google/index.jsp?ndmViewId=news_view&newsId=20070725005391&newsLang=en) (last visited January 11, 2008).

1 business model is based upon mass infringing conduct, SeeqPod's "angel" investors
2 intentionally subsidize the infringement of Plaintiffs' works in order to maximize
3 their return when they cash out of their investment.

4 **COMMON ALLEGATIONS**

5 **Plaintiffs' Business**

6 16. Plaintiffs produce, distribute, sell and license the distribution and sale
7 of sound recordings in phonorecords and digital audio recordings. Plaintiffs are
8 among the leading producers of such works in the United States, and their names
9 and reputations for distributing works of high artistic and technical quality are
10 known favorably and widely throughout the United States and the world.

11 17. Plaintiffs have invested and continue to invest substantial sums of
12 money, as well as time, effort, and creative talent, to discover and develop
13 recording artists, and to create, produce, advertise, promote, sell and license works
14 embodying the performances of recording artists in whose works Plaintiffs have
15 exclusive rights. In order to create and sell such works, Plaintiffs make payments
16 to these recording artists, other musicians, songwriters, music publishers, various
17 trust funds established for such musicians' benefit, producers, technicians and other
18 staff personnel, as well as various other payments. Plaintiffs and their recording
19 artists are compensated for their monetary investments largely from the sale and
20 distribution of their works to the public and from fees for the reproduction,
21 distribution, digital performance, or other exploitation of such works. Absent such
22 compensation, profits and motivation are siphoned away from artists and from
23 Plaintiffs and the pool of resources available for finding and promoting new artists
24 shrinks. The ultimate result is that the public's access to a continuing and wide
25 variety of high-quality musical recordings is sharply curtailed.

26 18. Under Section 106 of the Copyright Act of 1976, 17 U.S.C. § 101 *et*
27 *seq.* (the "Copyright Act"), Plaintiffs have the distinct, severable, and exclusive
28 rights to, among other things, reproduce and distribute their copyrighted works and

1 to publicly perform them by means of digital audio transmissions. 17 U.S.C.
2 §§ 106(1)-(6). SeeqPod and its users have not received any authorization,
3 permission or consent to use the copyrighted works at issue in this lawsuit.

4 19. Plaintiffs have entered into legitimate contractual arrangements with
5 digital music services permitting the authorized digital streaming performance of
6 their copyrighted works. For example, Plaintiffs' affiliate, Warner Music Inc.,
7 recently entered into an agreement with the online community website imeem.com
8 to stream Plaintiffs' copyrighted music through imeem's site.³

9 SeeqPod.com

10 20. SeeqPod operates a web site located on the Internet at
11 <http://www.seeqpod.com>. SeeqPod's service formally was launched in or around
12 May 2007.

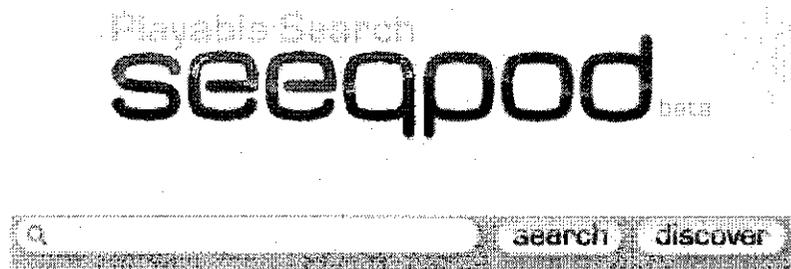
13 21. While SeeqPod likes to describe itself as a search engine, SeeqPod in
14 fact targets a particular type of content—music—that SeeqPod knows is
15 overwhelmingly copyrighted and posted without authorization from copyright
16 owners, including Plaintiffs. SeeqPod expressly promotes itself as the “no cost”
17 “home for playable search results.”⁴ SeeqPod's homepage provides users with
18 three options. They can “Search” for works by typing in the artist name, song
19 name, album name, or other identifiable criteria. Users also can “Discover” works,
20 by asking SeeqPod to “search[] for music recommendations by looking at the
21 context in which the song is found and turning up related songs as results.”⁵ This
22 advanced tool allows users to find works by artists that are similar to those that they
23 already like. Further, users can directly click on popular music titles provided by
24 SeeqPod's “PodCrawler” technology, which returns a rolling list of works,

25 ³ <http://www.informationweek.com/news/showArticle.jhtml?articleID=201001085>
26 (last visited January 11, 2008).

27 ⁴ http://www.seeqpod.com/frequently_asked_questions.php (last visited January 11,
28 2008) (emphasis added).

⁵ <http://www.seeqpod.com/blog/> (last visited January 11, 2008).

1 including copyrighted content, that SeeqPod finds. The following screenshot is an
2 example of this rolling list of artists, which contains copyrighted content by the
3 group Van Halen released by Plaintiff WBR:



9 Playable Search results the PodCrawler just found...



16 22. SeeqPod states that it “crawl[s] the entire world wide multilingual
17 deep web in the vertical space of entertainment for the purpose of new kinds of
18 playable search, discovery, recommendation and social experiences.”⁷ One media
19 publication reported that SeeqPod has access to “millions” of audio files, and said
20 that it had “challenged SeeqPod with some pretty obscure titles, and came away
21 listening to just what we were looking for.”⁸ SeeqPod also has created a “Did you
22 mean” feature which allows users to search for the names of recording artists based
23 upon popular misspellings. For example, for the band Depeche Mode, which has
24 released and continues to release numerous copyrighted works on Plaintiffs’ labels,

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26 ⁶ <http://www.seeqpod.com/> (last visited January 16, 2008).

27 ⁷ http://www.seeqpod.com/frequently_asked_questions.php (last visited January 11, 2008).

28 ⁸ <http://www.iphonefaq.org/archives/97182> (last visited January 11, 2008).

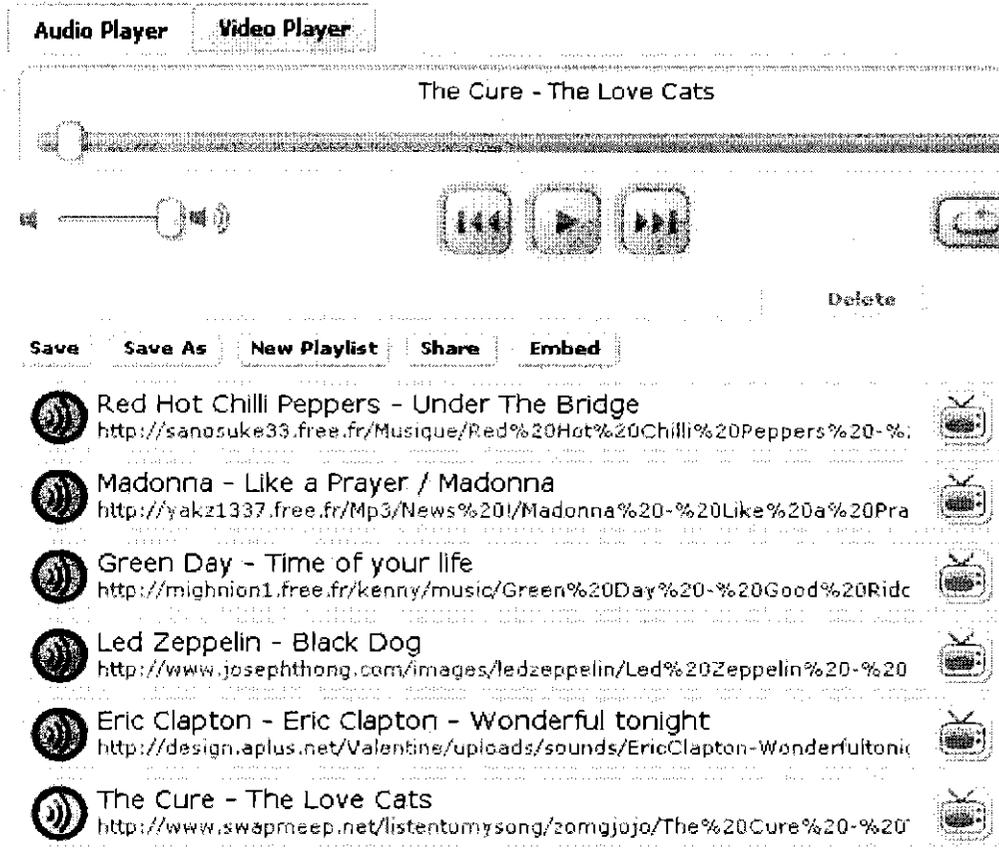
1 SeeqPod states: “Hey, we all know how to spell ‘Depeche Mode.’ But rest assured,
2 if you type in ‘Depesh Mode’ you’ll still have access to over 650 related tracks and
3 will be afforded the fun of clicking on any of the other ‘Did you mean’ suggestions
4”⁹ SeeqPod employs no filtering technology to screen out search terms seeking
5 the copyrighted works of Plaintiffs or other copyright holders.

6 23. SeeqPod does not just scour the web for copyrighted music. SeeqPod
7 also performs the works whose location is revealed through SeeqPod’s seach. With
8 the simple click of a computer mouse, users can have SeeqPod play the song they
9 were searching for—at “no cost” over their computers or mobile devices.

10 24. SeeqPod also encourages and facilitates its users’ creation of “personal
11 playlists,” as well as the librarying of those playlists for repeated, free and
12 unauthorized future listening.¹⁰ A sample playlist, constructed of just a handful of
13 Plaintiffs’ copyrighted works available through SeeqPod, looks like the following:

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26 _____
27 ⁹ <http://www.seeqpod.com/blog/> (last visited January 14, 2008).

28 ¹⁰ http://www.seeqpod.com/frequently_asked_questions.php (last visited January 11, 2008).



25. Individual sound recordings and playlists also are available for online digital streaming to everyone with whom the user shares the content or views a website where the user has embedded the content. SeeqPod urges its users to share individual sound recordings and playlists “with friends by emailing a link to the playlist or embedding a player and playlist in a web page”¹¹ SeeqPod’s embedding feature allows users to create links to content provided through SeeqPod on *other* websites, such as popular social networking sites like MySpace or Facebook. Using unauthorized content as the bait, SeeqPod uses the embedding feature to lure even more users to SeeqPod from the massive user bases of social-networking sites. A single Facebook user can bring his or her entire network of friends onto SeeqPod simply by embedding a SeeqPod playlist into his or her

¹¹ *Id.*

1 Facebook profile. The “embed” feature is just one more example of the way that
2 SeeqPod uses copyrighted content to propagate the viral growth of its user base.

3 26. In addition to searching the Internet for requested music, SeeqPod
4 expressly invites its users to “submit URLs to SeeqPod to be crawled and indexed”
5 as “new content becomes available on the web.”¹² Websites submitted “will appear
6 visible, searchable, mashable and playable to the Universe”¹³ SeeqPod does
7 not filter or otherwise screen the submitted URLs for copyrighted content, just as
8 SeeqPod deliberately refrains from filtering copyrighted content that its web
9 crawling search engine recovers. SeeqPod refrains from such filtering because it
10 knows that screening out unauthorized copyrighted content would dramatically
11 decrease the content that SeeqPod uses for free and undermine SeeqPod’s
12 illegitimate business model.

13 27. SeeqPod also has released what it calls “widgets” for mobile devices,
14 stating in a recent press release that “Millions of Songs” are “Now Accessible Over
15 Any Network, Via Mobile Devices.”¹⁴ SeeqPod claims that this “widget”
16 technology “allows users to *instantly* . . . search for, discover and play music from
17 the Internet” on a variety of popular mobile devices, including the iPhone.¹⁵ Users
18 can “access and share playlists on the spot within most any social network.”¹⁶ As
19 one reviewer described the SeeqPod mobile device technology, “you can search for
20 any artist and play their songs within seconds, for free.”¹⁷ SeeqPod also provides
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23 ¹² *Id.*

24 ¹³ http://www.seeqpod.com/galactic_upload.php (last visited January 17, 2008).

25 ¹⁴

26 [http://home.businesswire.com/portal/site/google/index.jsp?ndmViewId=news_view
&newsId=20070725005391&newsLang=en](http://home.businesswire.com/portal/site/google/index.jsp?ndmViewId=news_view&newsId=20070725005391&newsLang=en) (last visited January 11, 2008).

27 ¹⁵ *Id.* (emphasis added).

28 ¹⁶ *Id.*

¹⁷ <http://blog.wired.com/music/2007/07/play-mp3-blog-m.html> (last visited January
11, 2008).

1 video demonstrations of how to obtain instant streaming of any requested sound
2 recording or video over the iPhone and other devices.¹⁸

3 28. SeeqPod not only allows users to listen to, save, and share copyrighted
4 content whenever they want, but it also facilitates the unauthorized uploading and
5 downloading of copyrighted works. In its search results, SeeqPod provides users
6 with the precise Internet address where SeeqPod's users can find and download
7 unauthorized copies of copyrighted sound recordings. A typical example, featuring
8 one of Plaintiffs' copyrighted works, appears as follows:



Madonna - Cherish

<http://web.tiscali.it/ytnlsovivr/Madonna-Cherish.mp3>

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12 29. SeeqPod flaunts and promotes the fact that it is a site for finding and
13 playing copyrighted music for free. Just within the past month, SeeqPod issued a
14 press release that touted the top 100 search terms used on SeeqPod in 2007. Kasian
15 Franks, SeeqPod's CEO and co-founder, explained that SeeqPod released the list
16 because "we thought it would be fun to release the terms that have been most
17 sought after."²⁰ Not surprisingly, what is "sought after" on SeeqPod is music by
18 popular recording artists that is overwhelmingly copyrighted.²¹ Nearly one out of
19 every four artists on SeeqPod's "top 100" is an artist whose sound recordings are
20 owned by Plaintiffs. For example, the popular recording group Linkin Park, whose
21 works have been released by Plaintiff WBR, appears at number two on the list—
22 just behind The Beatles. The fact that SeeqPod's "top 100" list is comprised of
23 popular recording artists provides further evidence of what is obvious: that

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25 ¹⁸ http://www.seeqpod.com/news_2007.09.19.html (last visited January 11, 2008).

26 ¹⁹ <http://www.seeqpod.com/music/> (last visited January 11, 2008).

27 ²⁰

[http://www.businesswire.com/portal/site/google/index.jsp?ndmViewId=news_view
&newsId=20071220005576&newsLang=en](http://www.businesswire.com/portal/site/google/index.jsp?ndmViewId=news_view&newsId=20071220005576&newsLang=en) (last visited January 11, 2008).

28 ²¹ <http://www.seeqpod.com/blog/> (last visited January 11, 2008).

1 SeeqPod is a site that is designed, operated and used for the free and unauthorized
2 use of copyrighted music.

3 30. Unsurprisingly, SeeqPod's users emphatically have expressed their
4 enthusiasm for the free copyrighted music available on SeeqPod. For example, in
5 SeeqPod's user feedback section, one user stated: "You ROCK!!!! This is the
6 best music site on the web. I ABSOLUTELY LOVE IT. The fact that I can search
7 for any song or artist and hear the music instantly (for the most part) is great. The
8 coup de grâce is the fact that you can create a playlist, WHEHEW!!! I hope for
9 your sake you are the next GOOGLE!"²² Similarly, another user said: "Music isn't
10 a hassle to find anymore. Instead, it finds me with blue font and a play button.
11 You guys are awesome. I need to find out the algorithms you use"²³

12 31. SeeqPod is hardly indifferent to the rampant infringement taking place
13 through its site. On the contrary, SeeqPod is building a business based on mass
14 infringement, because that infringement fuels a growing user base. On the Internet,
15 a larger user base translates into higher potential advertising revenue and increased
16 capitalization for investors anxious to maximize the returns of a growing user base.
17 SeeqPod states on its site that it uses personal information collected from registered
18 users to "customize the advertising" they "see" and to "display[] targeted
19 advertisements."²⁴

20 32. SeeqPod's CEO and co-founder Kasian Franks has made it clear that
21 SeeqPod intends to expand its revenues by attracting more and more users to the
22 site through the enticement of free copyrighted music. In a recent article, he stated
23 that "music is the best way to get user adoption and for Seeqpod to garner the ad
24 revenue associated with a successful search engine."²⁵ Franks further stated that

25 ²² http://www.seeqpod.com/user_feedback.php (last visited January 11, 2008).

26 ²³ *Id.* (ellipses in original).

27 ²⁴ <http://www.seeqpod.com/privacy.html> (last visited January 11, 2008).

28 ²⁵ Jango and Seeqpod Hope to Monetize Music,
<http://gigaom.com/2008/01/09/jango-and-seeqpod-hope-to-monetize-music/> (last

1 “[m]usic is a superb strategic platform for rolling out services and promotion,” and
2 that “consumers don’t care about the search engine; [search engines] are a transition
3 point that enables them to get to another place on the web.”²⁶

4 33. SeeqPod is a direct—but illegitimate—competitor to legitimate
5 streaming music websites. Legitimate websites obtain permission to disseminate
6 works through their system. SeeqPod simply helps itself to that content for free and
7 without authorization. A recent “VentureBeat” article, for example, described
8 “SeeqPod” as a “competitor” to the streaming site “Imeem,” but noted that, unlike
9 Imeem, SeeqPod had not “cut” licensing “deals” – *i.e.*, SeeqPod had not obtained
10 permission for the use of copyrighted content – with content owners such as
11 Plaintiffs.²⁷

12 **SeeqPod’s Direct Infringement Of Plaintiffs’ Copyrights And Intentional**
13 **Facilitation of Users’ Infringing Activity for Financial Gain**

14 34. SeeqPod has actively engaged in, facilitated and fostered countless
15 acts of infringement. It intentionally entices users to flock to its website through
16 offering what it describes as a “no cost” “home for playable search results” that
17 allows users to stream on-demand performances of copyrighted works, generate
18 countless playlists of the same, save playlists, and “share[]” them “with friends by
19 emailing a link to the playlist or embedding a player and playlist in a web page”
20 linked to SeeqPod.²⁸ SeeqPod’s business model is based upon the free and
21 unauthorized availability of Plaintiffs’ popular copyrighted works and the works of
22 other copyright owners.

23
24
25 visited January 11, 2008).

26 ²⁶ *Id.*

27 ²⁷ <http://venturebeat.com/2007/07/12/warner-streams-entire-catalog-of-music-for-free-on-imeem/> (last visited January 11, 2008).

28 ²⁸ http://www.seeqpod.com/frequently_asked_questions.php (last visited January 11, 2008).

1 35. SeeqPod engages in direct copyright infringement, including by
2 violating Plaintiffs' exclusive right to publicly perform their works by means of
3 digital audio transmissions. SeeqPod's "Playable Search" technology locates,
4 aggregates, and plays on-demand digital streams of vast numbers of copyrighted
5 works. As one article aptly described SeeqPod, it provides "Millions of Songs on
6 your iPhone for free. . . . SeeqPod gives you immediate, playable access to
7 countless songs from across the internet. . . . Now you've got them, except for
8 free."²⁹ SeeqPod exacerbates its massive direct infringement of Plaintiffs' public
9 performance rights by encouraging its users to save playlists of sound recordings, to
10 have SeeqPod repeatedly play those playlists, and to have users email and embed
11 those playlists in other websites, such as MySpace or Facebook, in the hopes of
12 drawing additional users from those sites who will use SeeqPod in the same way
13 and thereby fuel SeeqPod's viral growth.

14 36. SeeqPod also deliberately induces and facilitates the rampant
15 infringement of copyrighted works by its large and rapidly expanding user base. It
16 provides users with the means to locate, aggregate, play, and distribute its
17 "playable" search results. SeeqPod is not simply aware of how its service is being
18 used, but is actively promoting it as a free, interactive on-demand service. Among
19 other things, SeeqPod provides video demonstrations showing users how to use the
20 site to obtain instant streaming of any requested work over their iPhone or other
21 mobile device. Further, SeeqPod actively solicits users to submit links to sites that
22 host unauthorized copies of copyrighted music, and SeeqPod serves those links to
23 other users. Moreover, SeeqPod provides users with the means to download
24 unauthorized copies of copyrighted works to their computers or mobile devices by
25 giving them the Internet source location of the digital music files behind its
26 "playable" search results. In an article entitled "SeeqPod is a Google for illegal
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28 ²⁹ <http://www.iphonefaq.org/archives/97182> (last visited January 11, 2008).

1 music?," the author describes how SeeqPod provides the Internet location for each
2 "playable" search result, how the user can download the file based upon this
3 location, and "how easy" SeeqPod makes it "to get music for which you would
4 otherwise have to pay."³⁰

5 37. SeeqPod knows full well the substantial infringement occurring
6 through its website. It explicitly invites users to "search for and discover artists and
7 songs,"³¹ content that SeeqPod knows is copyrighted. SeeqPod admits that the
8 music sites it links to may contain copyrighted content, stating that "[m]aterial
9 available on or through other web sites may be protected by copyright and the
10 intellectual property laws of the United States and/or other countries."³² Even a
11 cursory review of SeeqPod's website demonstrates massive infringement of
12 Plaintiffs' copyrighted works. SeeqPod also has knowledge of the mass
13 infringement of copyright taking place through its system from notifications
14 SeeqPod has received from copyright holders or their representatives, including the
15 Recording Industry Association of America ("RIAA"). The RIAA has notified
16 SeeqPod of the infringement of thousands of copyrighted works, including
17 Plaintiffs', by and through the SeeqPod system.

18 38. In its public statements, SeeqPod adopts a "head in the sand" approach
19 to the massive copyright infringement taking place on its site. SeeqPod states that
20 as a purportedly simple "search engine" it should be "shield[ed]" from "liability"
21 because it does no more than "search[] and display[] search results."³³ As
22 discussed above, however, SeeqPod, is no simple "search engine." SeeqPod is
23 what it appears to be from the first instant that a user encounters its site: an

24 ³⁰ <http://tech-buzz.net/2007/10/21/seeqpod-is-a-google-for-illegal-music/> (last
25 visited January 11, 2008).

26 ³¹ http://www.seeqpod.com/frequently_asked_questions.php (last visited January
27 11, 2008).

28 ³² <http://www.seeqpod.com/copyright.php> (last visited January 11, 2008).

³³ http://www.seeqpod.com/frequently_asked_questions.php (last visited January
11, 2008).

1 unlawful music service that directly engages in, encourages, and facilitates the mass
2 infringement of Plaintiffs' and other intellectual property owners' copyrighted
3 works. This is well known to SeeqPod. Co-founder and CEO Kasian Franks aptly
4 described SeeqPod's own business dynamic, stating, "[m]usic is a superb strategic
5 platform for rolling out services and promotion," and "consumers don't care about
6 the search engine" ³⁴

7 39. SeeqPod receives a direct and substantial financial benefit from the
8 infringing activity occurring on its website. An increased user base for SeeqPod,
9 drawn by the lure of free music, translates into higher potential future advertising
10 revenue and corporate valuation, all inuring to the benefit of the company, its
11 owners and its "angel" investors.

12 40. SeeqPod has the right and ability to supervise and to limit the
13 infringing content that occurs through its site. SeeqPod expressly reserves the right
14 "to disable and/or terminate the accounts of users who may infringe or repeatedly
15 infringe the copyrights or other intellectual property rights of SeeqPod and/or
16 others."³⁵ SeeqPod also expressly retains the right in its "sole discretion to pre-
17 screen, refuse, or [re]move any Content that is available via the Service. Without
18 limiting the foregoing, SeeqPod and its designees shall have the right to remove any
19 Content that violates the [Terms of Service] or is otherwise objectionable."³⁶
20 SeeqPod further states that it is its policy, "in appropriate circumstances and at its
21 discretion, to disable and/or terminate the accounts of users who may infringe or
22 repeatedly infringe the copyrights or other intellectual property rights of SeeqPod
23 and/or others."³⁷

24 _____
25 ³⁴ Jango and Seeqpod Hope to Monetize Music,
<http://gigaoin.com/2008/01/09/jango-and-seeqpod-hope-to-monetize-music/> (last
26 visited January 11, 2008).

27 ³⁵ <http://www.seeqpod.com/copyright.php> (last visited January 11, 2008).

28 ³⁶ http://www.seeqpod.com/terms_of_service.php (last visited January 11, 2008).

³⁷ <http://www.seeqpod.com/copyright.php> (last visited January 11, 2008).

1 the draw of unauthorized music files illegally copied, distributed and publicly
2 performed using its service in violation of Plaintiffs' copyrights.

3 60. Each infringement by SeeqPod of Plaintiffs' copyrighted works
4 constitutes a separate and distinct act of infringement.

5 61. SeeqPod's acts of infringement were willful, in disregard of and with
6 indifference to the rights of Plaintiffs.

7 62. As a direct and proximate result of the infringements by SeeqPod,
8 Plaintiffs are entitled to damages and SeeqPod's profits in amounts to be proven at
9 trial which are not currently ascertainable.

10 63. Alternatively, Plaintiffs are entitled to the maximum statutory damages
11 in the amount of \$150,000 with respect to each work infringed, or for such other
12 amounts as may be proper under 17 U.S.C. § 504.

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

15 65. As a direct and proximate result of the foregoing acts and conduct,
16 Plaintiffs have sustained and will continue to sustain substantial, immediate and
17 irreparable injury, for which there is no adequate remedy at law. Unless enjoined
18 and restrained by this Court, SeeqPod will continue to infringe Plaintiffs' rights in
19 their copyrighted works. Plaintiffs are entitled to preliminary and permanent
20 injunctive relief.

21 **FOURTH CLAIM**

22 **(Inducing Copyright Infringement)**

23 66. Plaintiffs incorporate herein by reference each and every averment
24 contained in paragraphs 1 through 41, inclusive.

25 67. Through its conduct averred herein, SeeqPod has infringed Plaintiffs'
26 copyrights by inducing SeeqPod's users to reproduce, distribute, and/or publicly
27 perform audio works embodying the copyrighted material (including by means of
28

1 digital audio transmissions) without authorization in violation of Sections 106 *et*
2 *seq.* and Section 501 of the Copyright Act. 17 U.S.C. §§ 106 *et seq.*, and 501.

3 68. Each infringement by SeeqPod of Plaintiffs' copyrighted works
4 constitutes a separate and distinct act of infringement.

5 69. SeeqPod's acts of infringement were willful, in disregard of and with
6 indifference to the rights of Plaintiffs.

7 70. As a direct and proximate result of the infringements by SeeqPod,
8 Plaintiffs are entitled to damages and SeeqPod's profits in amounts to be proven at
9 trial which are not currently ascertainable.

10 71. Alternatively, Plaintiffs are entitled to the maximum statutory damages
11 in the amount of \$150,000 with respect to each work infringed, or for such other
12 amounts as may be proper under 17 U.S.C. § 504.

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

15 73. As a direct and proximate result of the foregoing acts and conduct,
16 Plaintiffs have sustained and will continue to sustain substantial, immediate and
17 irreparable injury, for which there is no adequate remedy at law. Unless enjoined
18 and restrained by this Court, SeeqPod will continue to infringe Plaintiffs' rights in
19 their copyrighted works. Plaintiffs are entitled to preliminary and permanent
20 injunctive relief.

21 **FIFTH CLAIM**

22 **(Statutory and Common Law Misappropriation)**

23 74. Plaintiffs incorporate herein by reference each and every averment
24 contained in paragraphs 1 through 41, inclusive.

25 75. Plaintiffs possess exclusive ownership interests in and to the Pre-1972
26 Recordings under applicable statutory and common law.

27 76. Through its conduct, SeeqPod has violated Plaintiffs' exclusive
28 ownership interest in and to the Pre-1972 Recordings.

1 1. For Plaintiffs' damages and SeeqPod's profits in such amount as may
2 be found; alternatively, for maximum statutory damages in the amount of \$150,000
3 with respect to each copyrighted work infringed either directly or indirectly, or for
4 such other amounts as may be proper pursuant to 17 U.S.C. § 504(c).

5 2. For preliminary and permanent injunctions enjoining SeeqPod, and all
6 persons acting in concert or participation with SeeqPod, from: (a) directly or
7 indirectly reproducing, distributing, publicly performing, or otherwise infringing in
8 any manner on Plaintiffs' copyrighted works, whether now in existence or
9 hereinafter created, or on Plaintiffs' Pre-1972 Recordings; (b) causing, contributing
10 to, inducing, enabling, facilitating, or participating in the infringement of any of
11 Plaintiffs' copyrighted works or Pre-1972 Recordings; and (c) from displaying their
12 mark and/or logo in connection with the dissemination of unauthorized copies of
13 Plaintiffs' copyrighted works or Pre-1972 Recordings.

14 3. For restitution of SeeqPod's unlawful proceeds.

15 4. For an accounting and the imposition of a constructive trust.

16 5. For punitive and exemplary damages, as authorized for Plaintiffs' state
17 law claims, in such amount as may be awarded at trial.

18 6. For prejudgment interest according to law.

19 7. For Plaintiffs' attorneys' fees and full costs incurred in this action.
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1 8. For such other and further relief as the Court may deem just and
2 proper.

3 DATED: January 18, 2008

MUNGER, TOLLES & OLSON LLP
GLENN D. POMERANTZ
KELLY M. KLAUS
JONATHAN H. BLAVIN

6
7 By: 
8 _____
9 GLENN D. POMERANTZ

10 Attorneys for Plaintiffs
11 WARNER BROS. RECORDS INC.,
12 ATLANTIC RECORDING
13 CORPORATION, ELEKTRA
14 ENTERTAINMENT GROUP INC., and
15 RHINO ENTERTAINMENT
16 COMPANY

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DEMAND FOR JURY TRIAL

Plaintiffs hereby request a trial by jury on all issues triable by jury.

DATED: January 18, 2008

MUNGER, TOLLES & OLSON LLP
GLENN D. POMERANTZ
KELLY M. KLAUS
JONATHAN H. BLAVIN

By: 

Attorneys for Plaintiffs
WARNER BROS. RECORDS INC.,
ATLANTIC RECORDING
CORPORATION, ELEKTRA
ENTERTAINMENT GROUP INC., and
RHINO ENTERTAINMENT
COMPANY

EXHIBIT A

Plaintiff	Sound Recording	Recorded By	Copyright Registration Number
Warner Bros. Records Inc.	Neil Young Greatest Hits	Neil Young	SR 362-313
Warner Bros. Records Inc.	American Life	Madonna	SR 330-200
Warner Bros. Records Inc.	Evita	Madonna et. al	SR 229-813
Warner Bros. Records Inc.	Die Another Day Soundtrack	Madonna et al.	SR 323-350
Warner Bros. Records Inc.	Nimrod	Green Day	SR 390-775
Warner Bros. Records Inc.	Hybrid Theory	Linkin Park	SR 288-402
Warner Bros. Records Inc.	Californication	Red Hot Chili Peppers	SR 174-922
Warner Bros. Records Inc.	Stadium Arcadium	Red Hot Chili Peppers	SR 244-558
Warner Bros. Records Inc.	Road to Ruin	Ramones	SR 4-335
Warner Bros. Records Inc.	Hunting High and Low	a-ha	SR 63-603

Plaintiff	Sound Recording	Recorded By	Copyright Registration Number
Warner Bros. Records Inc.	The Old Apartment / Lovers in a Dangerous Time	Barenaked Ladies	SR 234-360
Atlantic Recording Corporation	Yaga Yaga	Terror Fabulous	SR 190-383
Atlantic Recording Corporation	Adrenaline Rush	Twista	SR 238-303
Atlantic Recording Corporation	Yourself or Someone Like You	Matchbox 20	SR 227-755
Elektra Entertainment Group Inc.	Meet the Girl Next Door	Lil' Mo	SR 353-787
Elektra Entertainment Group Inc.	More Street Dreams	Fabulous	SR 354-869
Elektra Entertainment Group Inc.	Make It Last Forever	Keith Sweat	SR 86-761
Elektra Entertainment Group Inc.	Supa Dupa Fly	Missy Misdemeanor Elliot	SR 245-232
Elektra Entertainment Group Inc.	The Coming	Busta Rymes	SR 225-705



EXHIBIT B

Plaintiff	Sound Recording	Recorded By
Warner Bros. Records Inc.	Masters of Reality	Black Sabbath
Warner Bros. Records Inc.	Paranoid	Black Sabbath
Rhino Entertainment Company	Chicago Transit Authority	Chicago
Rhino Entertainment Company	Superfly	Curtis Mayfield
Atlantic Recording Corporation	Lady Soul	Aretha Franklin
Atlantic Recording Corporation	I Never Loved a Man the Way I Love You	Aretha Franklin
Atlantic Recording Corporation	Save the Last Dance For Me	Drifters
Atlantic Recording Corporation	Led Zeppelin II	Led Zeppelin
Atlantic Recording Corporation	Led Zeppelin IV	Led Zeppelin
Elektra Entertainment Group Inc.	L.A. Woman	The Doors

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Other searches:

[Green](#)

[Green Day](#)

[Green Carnation](#)



Green Day - King For A Day

<http://www.lesassoiffes.ch/multimedias/16> - King For A



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Green Day - Nice Guys Finish Last

<http://esunfx.com/music/Green Day - Nimrod - 01 - 1>



Green Day - Time of your life

<http://mighnion1.free.fr/kenny/music/Green Day - Go>



Green Day - Good Riddance

<http://www.angelfire.com/mi2/sebscoolrpgpage/mp3s/1>



Green Day - Time of Your Life

http://www.cdyca.org//green_day__time_of_your_lif



Green Day - Good Ridance (Time of Your Lif

<http://herdfamily.com/twoormore/audio/Green Day - 1>



Green Day - Good Riddance (Time of Your L

http://www.sandiegopits.com//green_day__good_rid



Green Day - Time of Your Life

http://ironordermc.com/media/Alternative_Rap_Rock_-



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Green Day - Time of Your Life

<http://coronasbesthomes.com/Music/Green Day - Time>



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Green Day - Time of Your Life

<http://home.ec.rr.com/njddbz/Green Day - Time of Yo>



Green Day - Time of Your Life

http://www.imperterritus.com/media/Green_Day_-_Ti



Green Day - Good Riddance (Time of Your L

http://www.sandiegopits.com//green_day__good_rid



Green Day - Good Riddance (Time of Your L

<http://hera.divshare.com/files/2007/05/27/751022/Gre>



Green Day - Reject

<http://24.191.32.203/ILNEW/Radio/punk/Green Day ->



Green Day - The Grouch

<http://24.191.32.203/ILNEW/Radio/punk/Green Day ->



Green Day - Good Riddance (Time Of Your L

<http://24.191.32.203/ILNEW/Radio/punk/Green Day ->



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Green Day - Last Ride In

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Green Day - Prosthetic Head

<http://24.191.32.203/ILNEW/Radio/punk/Green Day ->



Green Day - Haushinka

<http://24.191.32.203/ILNEW/Radio/punk/Green Day ->



Green Day - Worry Rock

<http://24.191.32.203/ILNEW/Radio/punk/Green Day ->



Green Day - Hitchin' A Ride

<http://24.191.32.203/ILNEW/Radio/punk/Green Day ->



Green Day - Time of Your Life

<http://www.hybridproductions.net/music/Green Day ->



Green Day - Walking Alone

<http://24.191.32.203/ILNEW/Radio/punk/Green Day ->



Green Day - Worry Rock

<http://24.191.32.203/ILNEW/Radio/punk/Green Day ->



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<http://24.191.32.203/ILNEW/Radio/punk/Green Day -> 
-  **Green Day - All The Time**
<http://24.191.32.203/ILNEW/Radio/punk/Green Day -> 
-  **Green Day - Hitchin' A Ride**
<http://24.191.32.203/ILNEW/Radio/punk/Green Day -> 
-  **Green Day - Good Riddance (Time Of Your L**
http://www.andrew-jarrett.com/media/17_-_Good_Ridc 
-  **Green Day - Platypus (I Hate You)**
<http://locker.myyearbook.com/backpackfiles/2006/03/> 
-  **Green Day - Good Riddance Time Of Your Li**
http://www.geekandproud.net/stuff/17-Good_Riddance 
-  **Green Day - Last Ride In**
<http://www.yamonsvotal.com/Music/Green Day/Nimrod> 

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[Green Day](#)

[Green Carnation](#)



Green Day - Hitchin' A Ride

http://www.andrew-jarrett.com/media/02_-_Hitchin_A_



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Green Day - Time of Your Life

http://adlickintime.net/media/Greenday_-_Time_of_Yo



Green Day - Good Riddance (Time of Your L

<http://heather-peace.virtual-memorials.com/uploads/69>



Green Day - The Grouch

http://home.comcast.net/~walnuthill/the_grouch.mp3



Green Day - Good Riddance (Time of Your L

<http://opentron.net/tipforums/music/GoodRiddance.mp>



Green Day - You Lied

http://www.foldedspace.org/files/Greenday_-_You_lied



Green Day - Platypus (I Hate You)

<http://www.columbia.edu/~mjr2101/music/Platypus.mp>



Green Day - You Lied

[http://foldedspace.org/files/Greenday_-_You_lied_\(Rare](http://foldedspace.org/files/Greenday_-_You_lied_(Rare)



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Green Day - Good Riddance

<http://www.personal.utulsa.edu/~keely-flynn/Songs/tin>



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Green Day - Time of Your Life

<http://www.praetoriansquad.com/andy/Greenday> - Tir



Green Day - Good Riddance (Time Of Your L

<http://iplaybass.flyingstove.com/Music/Green Day/Nin>



Lightspeed Champion & Florence - Scattered

<http://www.box.net/shared/static/s4281m595j.mp3>



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[http://www.fileden.com/files/2007/1/4/596511/Keith Sweat - Ma](http://www.fileden.com/files/2007/1/4/596511/Keith%20Sweat%20-%20Ma)



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Keith Sweat - Make it last forever B-Cr3w13

[http://www.filelodge.com/files/room16/402776/music/Keith Swe.](http://www.filelodge.com/files/room16/402776/music/Keith%20Swe)



old school slow jams - keith sweat - make it last fo

[http://www.fileden.com/files/2006/12/10/493107/old school slow](http://www.fileden.com/files/2006/12/10/493107/old%20school%20slow)



make it last forever - keith sweat ft jaci mcghee

[http://www.filelodge.com/files/room48/1399327/make it last fo](http://www.filelodge.com/files/room48/1399327/make%20it%20last%20fo)



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Linkin Park - In The End - Linkin Park

<http://artsperso.free.fr//In The End - Linkin Park.mp3>



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Linkin Park - Linkin Park - By Myself

<http://miracle.planet.ee/Muusika/mingiuus/Linkin Park - B>



Linkin Park - Linkin Park - By Myself

<http://www.miracle.planet.ee/Muusika/mingiuus/Linkin Pa>



Linkin Park - Place for My Head

<http://www.culos.uni.cc/linkin park - hybrid theory/link>



Linkin Park - Crawling

<http://music.mizzao.tk/songs/Linkin Park/Linkin Park-H>



**Linkin Park - Alternative - Linkin Park - With **

<http://www.prism.gatech.edu/~gtg820x/WithYou.mp3>



Linkin Park - Cure for the Itch

<http://www.culos.uni.cc/linkin park - hybrid theory/link>



Linkin Park - Forgotten

<http://www.culos.uni.cc/linkin park - hybrid theory/link>



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Linkin Park - By Myself

<http://www.myfilehut.com/userfiles/150805/07 By Myself.mp3>



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Linkin Park - Place For My Head

<http://www.barriomulas.com/music/02-05-07/09 Place For My>



Linkin Park - In The End

<http://www.anigirl15.com/AniGirl15/In The End.mp3>



Linkin Park - High Voltage

http://linkin-inside.com/download/audio/hybrid_theory_ep/05



Linkin Park - With You

http://www.hybridproductions.net/music/with_you.mp3



Lincoln Park - One Step Closer

<http://webcfmx.no-ip.info/mmug/technology/flash/songs/Link>



Lincoln Park - PaperCut

<http://www.hybridproductions.net/music/linkin park - paper>



Grum Lee - One Step Closer

[http://www.grumlee.com/mp3/075_Grum_Lee_Acoustic_\(Link](http://www.grumlee.com/mp3/075_Grum_Lee_Acoustic_(Link)



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<http://www.prism.gatech.edu/~gtg820x/WithYou.mp3>



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Linkin Park - In the End

<http://www.culos.uni.cc/linkin park - hybrid theory/linkin>



Linkin Park - The Untitled (In the End)

http://jysan.free.fr/software/Linkin_Park-In-The-End.mp3



Linkin Park - Papercut

<http://www.freewebtown.com/lileminem300/library/audio/Li>



Linkin Park - In The End

<http://www.cnxstudios.com//08 - In The End - Linkin Park.a>



Linkin Park - Pushing Me Away

<http://www.aimini.net/p2p-file/sharing/music/gFsOCYnJxbFp>



Linkin Park - In The End

<http://cnxstudios.com//08 - In The End - Linkin Park.mp3>



Linkin Park - Crawling

<http://ghostofmars.free.fr/RUSH/Linkin Park - Crawling.mp>



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Linkin Park - One Step Closer

http://www.vendetta.com/snowgirl/mp3/linkin_park-one_ste



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http://linkinpark_uk2000.tripod.com/sitebuildercontent/siteb



Linkin Park - Crawling

http://www.quarrel.net/downloads/music/Linkin_Park-Crawl



Linkin Park - In The End

http://download.gameland.ru/xakep/post/14195/linkin_park



Linkin Park - Crawling

http://fanlinkinpark.dl.interia.pl/mp3/linkin_park-crawling.r



Linkin Park - In the End

[http://ghostofmars.free.fr/RUSH/Linkin_Park - In the End.mp](http://ghostofmars.free.fr/RUSH/Linkin_Park_-_In_the_End.mp)



Linkin Park - One Step Closer

<http://mpeg-search.com/241474/b5c479011e39d3bc2ea32c6c>



Linkin Park - My December

http://www.archive.org/download/LinkinParkMyDecember_0



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Linkin Park - In The End

http://www.xakep.ru/post/14195/linkin_park_-_in_the_end.1



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Linkin Park - Crawling

<http://www.jmac.org/~jah/media/LinkinPark-Crawling.mp3>



Linkin Park - My December

http://www.ilution.com/m/playlistspace/Linkin_Park_-_My_Dec



Linkin Park - Pushing Me Away

<http://www.mpeg-search.com/326850/0aec73c9ce27ec39fa9E>



Linkin Park - A Place For My Head

http://www.angelfire.com/gundam/noamaxwell_secret/Linkin



Linkin Park - Step Up

<http://www.freewebtown.com/lileminem300/library/audio/Linl>



Linkin Park - Pushing Me Away

http://ghostofmars.free.fr/RUSH/Linkin_Park_-_Pushing_Me_A



Linkin Park - One Step Closer

http://ghostofmars.free.fr/RUSH/Linkin_Park_-_One_Step_Clo



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Linkin Park - Crawling

<http://mpeg-search.com/241476/e0e48cb16c5c96392a65f804>



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Linkin Park - Papercut

<http://music.coranetwork.net/audio/Linkin Park - Papercut.n>



Linkin Park - Crawling

<http://music.coranetwork.net/audio/Linkin Park - Crawling.n>



Linkin Park - In the End

<http://music.coranetwork.net/audio/Linkin Park - In The Enc>



Linkin Park - Papercut

<http://www.animedai.com/musica/English/linkin park - pape>



Linkin Park - One Step Closer

<http://www.lexacehardware.com/vip3rinc/Music/Linkin Park>



Linkin Park - Runaway

<http://www.hybridproductions.net/music/Linkin Park - Runa>



Linkin Park - Crawling

<http://www.hybridproductions.net/music/Linkin Park - Craw>



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Linkin Park - A Place for My Head

<http://ghostofmars.free.fr/RUSH/Lincoln Park - A Place for My>



linkin park - In The End

<http://web.ics.purdue.edu/~cmerle/Linking Park - End.mp3>



Linkin Park - Crawling

http://www.seatigers.us/media/Lincoln_Park_-_crawl_1_.mp3



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<http://www.lexacehardware.com/vip3rinc/Music/Linking Park>



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Linkin Park - crawling

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Linkin Park - Carousel

http://lprussia.com/music/ht_ep/carousel.mp3



Linkin Park - Crawling

<http://mobile-shark.com/resources/music/1938005 - Crawling>



linkin park - In The End

<http://www.this-is-tom.com//end.mp3>



Linkin Park - Papercut

http://www.hellfire0218.com/music/linkin_park/hybrid_the



Linkin Park - One Step Closer

http://www.hellfire0218.com/music/linkin_park/hybrid_the



Linkin Park - Points Of Authority

<http://rtwk.ath.cx/xnp/music/poa56.mp3>



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Linkin Park - And One

<http://musik.hybrid-dimensions.com/musik/AndOne.mp3>



Linkin Park - Papercut

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Linkin Park - Crawling

<http://mobile-shark.com/resources/music/1938105 - Crawling>



Linkin Park - Runaway

<http://exchristian.com//way.mp3>



Linkin Park - Papercut

<http://www.oxygen-inc.com/music/01 - Papercut.mp3>



Linkin Park - Cure for the Itch

http://hellfire0218.com/music/linkin_park/hybrid_theory/1



Linkin Park - Part Of Me

http://prussia.com/music/ht_ep/part_of_me.mp3



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Linkin Park - In The End

<http://www.intensivecombatunion.com/random/intheend.mp3>



Linkin Park - *PaPeR cUt*

<http://www.geocities.com/machineibon/papercut.mp3>



Linkin Park - High Voltage

http://prussia.com/music/ht_ep/high_voltage.mp3



Linkin Park - High Voltage [Remix]

http://prussia.com/music/ht_ep/high_voltage_rmx.mp3



linkin park - In The End

<http://this-is-tom.com//end.mp3>



Linkin Park - Step Up

http://prussia.com/music/ht_ep/step_up.mp3



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Madonna - American Life

<http://khabarnameh.gooya.com/nabavi/archives/real/ma>



Madonna - American Life

<http://morebounce-oz.com/audio/AmericanLife.mp3>



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<http://www.eltawil.eu/media/music/Artists/Madonna/Am>



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http://www.ra-star.com/media/Madonna_-_American_L



Madonna - American life

<http://duesti209.dyndns.org/root/Musik/Interpreten L-N/M>



Madonna - Mother And Father

<http://www.eltawil.eu/media/music/Artists/Madonna/Am>



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Madonna - Nobody Knows Me

<http://www.eltawil.eu/media/music/Artists/Madonna/Ame>



Madonna - Nothing Fails

<http://www.eltawil.eu/media/music/Artists/Madonna/Ame>



Madonna - I'm So Stupid

<http://www.eltawil.eu/media/music/Artists/Madonna/Ame>



Madonna - Hollywood

<http://www.eltawil.eu/media/music/Artists/Madonna/Ame>



Madonna - Die Another Day

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|  | Madonna - Love Profusion
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Madonna - Die Another Day

http://www.american-buddha.com/bulletin_board/files/10_



Madonna - Easy Ride

<http://blog.kokoom.com/uploads/n/nikollah/129240.mp3>



-X-madonna - american life

http://www.xakep.ru/post/18205/-x-madonna_-_america



Madonna - American Life (full version)

<http://www.almelehy.ecommerce.hct.ac.ae/radiostation/Ma>



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Madonna - Evita (remix)

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Andrew Lloyd Webber - Requiem For Evita

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<http://file.humour25.free.fr/musique/rhcp/The Red Hot Chili Pepper>



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http://spy12x.free.fr/Mp3/_Non Classé_/Red Hot Chili Peppers - Ca



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<http://cybermesa.com/~equus/Sounds/Red Hot Chili Peppers - Cal>



Red Hot Chili Peppers - Californication

<http://musiquesmp3.free.fr/mp3s/Red Hot Chili Peppers - 06 - Cali>



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http://marifeandluis.com/music/Red_hot_chili_peppers_-_stadium_arcad



Red Hot Chili Peppers - Stadium Arcadium

<http://killerqueen.free.fr/redhot/Disc 1 - Jupiter/1-04 Stadium Arcadium>



Red Hot Chili Peppers - Stadium Arcadium

http://kari.goshlucky.com/Red_Hot_Chili_Peppers/Stadium_Arcadium/1



Red Hot Chili Peppers - Make You Feel Better

http://nfs2006.free.fr/Musique/08_Red_Hot_Chili_Peppers_-_Stadium_Arc



Red Hot Chili Peppers - Dani California

http://www.adoptedaustrian.net/glorylibertymix/scars/Red_Hot_Chili_Pe



The Red Hot Chili Peppers - Slow Cheetah

http://marifeandluis.com/music/Red_Hot_Chili_Peppers_-_Stadium_Arcad