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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CLEVELAND CONSTANTINE BROWNE, an individual; ANIKA JOHNSON, as personal representative and executor of the ESTATE OF WYCLIFFE JOHNSON, deceased; STEELY & CLEVIE PRODUCTIONS LTD., and CARL GIBSON, as personal representative and executor of THE ESTATE OF EPHRAIM BARRETT,

Plaintiffs,

v.

RODNEY SEBASTIAN CLARK DONALDS, an individual; CAROLINA GIRALDO NAVARRO, an individual; ARMANDO CHRISTIAN PÉREZ, an individual; GIORDANO ASHRUF, an individual; SHAREEF BADLOE, an individual; RASHID BADLOE, an individual; SONY MUSIC ENTERTAINMENT, a Delaware general partnership d/b/a ULTRA MUSIC; UNIVERSAL MUSIC PUBLISHING,

Case No.: 2:21-cv-02840-AB-AFM
Honorable André Birotte Presiding

SECOND CONSOLIDATED AMENDED COMPLAINT FOR:

1. COPYRIGHT INFRINGEMENT
2. VICARIOUS AND/OR CONTRIBUTORY COPYRIGHT INFRINGEMENT

JURY TRIAL DEMANDED

INC., a California corporation; BMG RIGHTS MANAGEMENT, LLC, a Delaware limited liability company; WARNER CHAPPELL MUSIC, Inc., a Delaware corporation; ULTRA RECORDS, LLC, a Delaware limited liability company; ENERGY MUSIC CORP, a Florida corporation, LUIS ALFONSO RODRÍGUEZ LÓPEZ-CEPERO, an individual; MAURICIO RENGIFO, an individual; ANDRÉS TORRES, an individual; MICHAEL ANTHONY TORRES MONGE, an individual; JUAN CARLOS OZUNA ROSADO, an individual; ERIKA MARÍA ENDER SIMOES, an individual; RAMÓN LUIS AYALA RODRÍGUEZ, an individual; OLADAYO OLATUNJI, an individual; STEPHANIE VICTORIA ALLEN, an individual; NICK RIVERA CAMINERO, an individual; SEBASTIÁN OBANDO GIRALDO, an individual; PABLO AREVALO LLANO, an individual; CARLOS EFRÉN REYES ROSADO, an individual; RAÚL ALEJANDRO OCASIO RUIZ, an individual; JUSTIN BIEBER, an individual; JASON PAUL DOUGLAS BOYD, an individual; UMG RECORDINGS, INC., a Delaware corporation individually and doing business as "Universal Music Latin Entertainment," "Geffen Records," and "Machette Records"; KOBALT MUSIC PUBLISHING LIMITED, an English private limited company; KOBALT MUSIC PUBLISHING AMERICA, INC., a Delaware corporation; LUIS ENRIQUE ORTIZ RIVERA, an individual; JUAN G RIVERA VASQUEZ, an individual;

EMMANUEL GAZMEY SANTIAGO, an individual; LLANDEL VEGUILLA MALAVÉ, an individual; JUAN CARLOS SALINAS JR., an individual; OSCAR EDWARD SALINAS, an individual; FRANCISCO SALDAÑA, an individual; VÍCTOR B CABRERA, an individual; CARLOS ISAÍAS MORALES WILLIAMS, an individual; URBANI MOTA CEDEÑO, an individual; MARCOS MASIS, an individual; JUAN LUIS MORERA LUNA, an individual; SONY/ATV MUSIC PUBLISHING (UK) LIMITED, an English private limited company; EL CARTEL RECORDS, INC., a Puerto Rican Corporation; GASOLINA PUBLISHING CO, a Puerto Rican Corporation; SONY MUSIC ENTERTAINMENT US LATIN, LLC, a Delaware Limited Liability Company; ABRAHAM MATEO CHAMORRO, an individual; JAVIER ALEXANDER SALAZAR, an individual; LARISSA DE MARCEDO MACHADO, an individual; JUSTIN RAFAEL QUILES RIVERA, an individual; PEERMUSIC III, LTD., A Delaware Corporation; PULSE RECORDS, INC,. a California Corporation; ALEXANDER DELGADO HERNANDEZ, an individual; RANDY MALCOM MARTINEZ, an individual; AUSTIN AGUSTIN SANTOS, an individual; RAFAEL CASTILLO TORRES, an individual; JESUS MANUEL NIEVES CORTEZ, an individual; ANDY CLAY CRUZ, an individual; XAVIER SEMPER, an individual; LUIAN MALAVE, an individual; SONY MUSIC PUBLISHING, LLC, a Delaware limited liability company; MAURICIO

ALBERTO REGLERO RODRIGUEZ, an individual; RICARDO ANDRES REGLERO RODRIGUEZ, an individual; ANDRES TORRES, an individual; JORGE VALDES, an individual; MAYBACH MUSIC GROUP, LLC, a Florida Limited Liability Company; CINQ MUSIC GROUP, LLC, a California Limited Liability Company; CINQ MUSIC PUBLISHING, LLC, a California Limited Liability Company; EGBERT ROSA CINTRON, an individual; REAL HASTA LA MEURTE, LLC, a Florida Limited Liability Company; NELSON DIAZ MARTINEZ, an individual; DANIEL OVIEDO, an individual; CARBON FIBER MUSIC, INC., a Florida Corporation; ENRIQUE IGLESIAS, an individual; RIMAS MUSIC, LLC, a Florida Limited Liability Company; BENITO ANTONIO MARTINEZ OCASIO, an individual; FELIX ORTIZ TORRES, an individual; GABRIEL PIZARRO, an individual; AURA MUSIC, LLC, a Florida Limited Liability Company; FREDDY MONTALVO JR., an individual; MIGUEL ANDRES MARTINEZ PEREA, an individual; CHRISTIAN MENA, an individual; VLADIMIR FELIX, an individual; ORLANDO JAVIER VALLE VEGA, an individual; EDWIN VASQUEZ VEGA, an individual; HIPGNOSIS SONGS GROUP, LLC, a Delaware Limited Liability Company; KEMOSABE RECORDS, LLC, a Delaware Limited Liability Company; REBBECA MARIE GOMEZ, an individual; JUAN LUIS LONDONO ARIAS, an individual; NATALIA AMAPOLA ALEXANDRA GUTIERREZ BATISTA, an individual;

CAMILO ECHEVERRIA, an individual; CONCORD MUSIC GROUP, LLC, a Delaware Limited Liability Company; PEDRO DAVID DALECCIO TORRES, an individual; MANUEL TURIZO ZAPATA, an individual; ANTON ALVAREZ, an individual; ALEJANDRO RENGIFO, an individual; MAURICIO RENGIFO, an individual; JESUS ALBERTO NAVARRO, an individual; JULIO RAMIREZ EGUIA, an individual; GILBERTO MARIN ESPINOZA, an individual; DANNA PAOLA RIVERA MUNGUIA, an individual; MICHAEL EGRED MEJIA, an individual; CARLOS ALBERTO VIVES RESTREPO, an individual; ENRIQUE MARTIN MORALES, an individual; MARCOS RAMIREZ, an individual; VICTOR R. TORRES, an individual; JULIO ALBERTO CRUZ GARCIA, an individual; VYDIA, INC., a Delaware Corporation; RICHARD CAMACHO, an individual; ERICK BRIAN COLON, an individual; CHRISTOPHER VELEZ, an individual; ZABDIEL DE JESUS, an individual; SALOMON VILLADA HOYOS, an individual; SOLAR MUSIC RIGHTS MANAGEMENT LIMITED, an English Limited Liability Company; GREEICY YELIANA RENDON CEBALLOS, an individual; DANIEL ALEJANDRO MORALES REYES, an individual; WILLIAM SAMI ETIENNE GRIGAHCINE, an individual; GLAD EMPIRE LIVE, LLC., a Puerto Rican Limited Liability Company; LUIS ANGEL O'NEILL LAUREANO, an individual; HEAR THIS MUSIC, LLC, a Puerto Rican Limited Liability Company;

MARCOS D. PEREZ, an individual; MARTHA IVELISSE PESANTE RODRIGUEZ, an individual; JOSE ALVARO OSORIO BALVIN, an individual; THOMAS WESLEY PENTZ, an individual; ERIC ALBERTO-LOPEZ, an individual; MAD DECENT PUBLISHING, LLC, a Delaware Limited Liability Company; MAD DECENT PROTOCOL, LLC, a Pennsylvania Limited Liability Company; JASON JOEL DESROULEAUX, an individual; JOSHUA CHRISTIAN NANAI, an individual; JULIO MANUEL GONZALEZ TAVAREZ, an individual; RICH MUSIC INC., a Delaware Corporation; GIENCARLOS RIVERA, an individual; JONATHAN RIVERA, an individual; KEVIN MAURICIO JIMENEZ LONDONO, an individual; BRYAN LEZCANO CHAVERRA, an individual; ERNESTO FIDEL PADILLA, an individual; DIMELO VI LLC, a Puerto Rican Limited Liability Company; VP RECORDS CORPORATION, a Puerto Rican Corporation; JOSE APONTE SANTI. an individual; MR. 305, INC., a Florida Corporation; ERIC PEREZ ROVIR, an individual; DUARS ENTERTAINMENT, CORP., a Puerto Rican Corporation; ISOLATION NETWORK INC. doing business as INGROOVES MUSIC GROUP, a California Corporation; ANDRES FELIPE ZAPATA GAVIRIA, an individual; EMPIRE DISTRIBUTION, INC. doing Business as EMPIRE a California Corporation; PAULO EZEQUIEL LONDRA FARIAS, an individual; AUBREY DRAKE GRAHAM, an

individual; OVO SOUND, LLC, a California Limited Liability Company; FLOW LA MOVIE, INC., a Florida Corporation; ROSALIA VILA I TOBELLA, an individual; JOSE ANGEL LOPEZ MARTINEZ, an individual; SILVESTRE FRANCISCO DANGOND CORRALES, an individual; GEOFFREY ROYCE ROJAS, an individual; LUIS ANTONIO QUINONES GARCIA, an individual; THE ROYALTY NETWORK, INC., a New York Corporation; MANUEL ENRIQUE CORTES CLEGHORN, an individual; WK RECORDS, LLC, a Florida Limited Liability Company; LA BASE MUSIC GROUP, LLC, a Florida Limited Liability Company; and DOES 1 - 20,
Defendants.

Plaintiffs, through counsel, hereby pray to this Honorable Court for relief based on the following:

Jurisdiction and Venue

1. This action arises under the Copyright Act of 1976, 17 U.S.C. § 101, *et seq.*

2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1338(a)-(b), and 1367(a).

3. Venue in this judicial district is proper under 28 U.S.C. §§ 1391(c), 1400(a).

Parties

4. Plaintiff Cleveland Constantine Browne is a resident of Kingston, Jamaica.

5. Plaintiff Anika Johnson is a resident of Jamaica, and joins in the action not individually, but solely in her capacity as the personal representative and executor of the Estate of Wycliffe Johnson, pursuant to the grant of administration by the Supreme Court of Judicature of Jamaica, Case No. 2015-P-00576. Mr. Johnson died on September 1, 2009, and was a resident of Kingston, Jamaica. As such, Ms. Johnson is a successor-in-interest to all personal property of Wycliffe Johnson, including his intellectual property rights.

6. Plaintiff Carl Gibson is a resident of Jamaica, and joins in the action not individually, but solely in his capacity as the personal representative and executor of the Estate of Ephraim Barrett, pursuant to the grant of administration by the Supreme Court of Judicature of Jamaica. Mr. Barrett died on August 17, 2020, and was a resident of Jamaica. As such, Mr. Gibson is a successor-in-interest to all personal property of Ephraim Barrett, including his intellectual property rights.

7. Plaintiff Steely & Clevie Productions Ltd. is a Jamaican limited company.

8. Upon information and belief, Plaintiffs allege that Defendant Rodney Sebastian Clark Donalds p/k/a El Chombo ("El Chombo") is an individual residing in Panama and doing business in and with the state of California, including in this judicial district.

9. Upon information and belief, Plaintiffs allege that Defendant Carolina Giraldo Navarro p/k/a Karol G ("Karol G") is an individual residing in Medellin, Colombia and doing business in and with the state of California, including in this judicial district.

10. Upon information and belief, Plaintiffs allege that Defendant Armando Christian Pérez p/k/a Pitbull ("Pitbull") is an individual residing in Miami, Florida and doing business in and with the state of California, including in this judicial district.

11. Upon information and belief, Plaintiffs allege that Defendant Giordano Ashruf is an individual residing in Arnhem, Netherlands and doing business in and with the state of California, including in this judicial district.

12. Upon information and belief, Plaintiffs allege that Defendant Shareef Badloe is an individual residing in Arnhem, Netherlands and doing business in and with the state of California, including in this judicial district.

13. Upon information and belief, Plaintiffs allege that Defendant Rashid Badloe is an individual residing in Arnhem, Netherlands and doing business in and with the state of California, including in this judicial district.

14. Upon information and belief, Plaintiffs allege that Defendants Giordano Ashruf, Shareef Badloe, and Rashid Badloe—collectively p/k/a Afro Bros ("Afro Bros")—are a DJ and record production entity of form unknown from Arnhem, Netherlands and doing business in and with the state of California, including in this judicial district.

15. Upon information and belief, Plaintiffs allege that Defendant Sony Music Entertainment, individually and doing business as "Ultra Music" (collectively "Sony"), is an American record label/music industry conglomerate and a Delaware general partnership with offices in Santa Monica, CA.

16. Upon information and belief, Plaintiffs allege that Defendant Universal Music Publishing, Inc. ("UMP") is a Delaware corporation with a principal place of business at 2100 Colorado Avenue, Santa Monica, CA 90404.

17. Upon information and belief, Plaintiffs allege that Defendant BMG Rights Management, LLC ("BMG") is a Delaware Limited Liability company with a principal place of business at 5670 Wilshire Blvd, Suite 1400, Los Angeles, CA 90036.

18. Upon information and belief, Plaintiffs allege that Defendant Warner Chappell Music, Inc. ("Warner") is a Delaware Corporation with a principal place of business at 777 S. Santa Fe Ave., Los Angeles, CA 90021.

19. Upon information and belief, Plaintiffs allege that Defendant Ultra Records, LLC ("Ultra") is a Delaware Limited Liability Company doing business in and with the state of California, including in this judicial district.

20. Upon information and belief, Plaintiffs allege that Defendant Energy Music Corp. is a Florida corporation doing business in and with the state of California, including in this judicial district.

21. Upon information and belief, Plaintiffs allege that Defendant Luis Alfonso Rodríguez López-Cepero p/k/a Luis Fonsi ("Luis Fonsi") is an individual residing in Miami, Florida and doing business in and with the state of California, including in this judicial district.

22. Upon information and belief, Plaintiffs allege that Defendant Mauricio Rengifo p/k/a El Dandee ("El Dandee") is an individual residing in Cali, Colombia and doing business in and with the state of California, including in this judicial district.

23. Upon information and belief, Plaintiffs allege that Defendant Andrés Torres ("Torres") is an individual residing in Los Angeles, California and doing business in and with the state of California, including in this judicial district.

24. Upon information and belief, Plaintiffs allege that Defendant Michael Anthony Torres Monge p/k/a Myke Towers ("Myke Towers") is an individual residing in San Juan, Puerto Rico and doing business in and with the state of California, including in this judicial district.

25. Upon information and belief, Plaintiffs allege that Defendant Juan Carlos Ozuna Rosado p/k/a Ozuna ("Ozuna") is an individual residing in San Juan,

Puerto Rico and doing business in and with the state of California, including in this judicial district.

26. Upon information and belief, Plaintiffs allege that Defendant Erika María Ender Simoes ("Simoes") is an individual residing in Miami, Florida and doing business in and with the state of California, including in this judicial district.

27. Upon information and belief, Plaintiffs allege that Defendant Ramón Luis Ayala Rodríguez p/k/a Daddy Yankee ("Daddy Yankee") is an individual residing in San Juan, Puerto Rico and doing business in and with the state of California, including in this judicial district.

28. Upon information and belief, Plaintiffs allege that Defendant Justin Bieber ("Bieber") is an individual residing in Los Angeles, California.

29. Upon information and belief, Plaintiffs allege that Defendant Jason Paul Douglas Boyd p/k/a Poo Bear ("Boyd") is an individual residing in Los Angeles, California, and/or doing business in and with the state of California, including in this judicial district.

30. Upon information and belief, Plaintiffs allege that Defendant Oladayo Olatunji p/k/a Dyo ("Dyo") is an individual residing in London, England and doing business in and with the state of California, including in this judicial district.

31. Upon information and belief, Plaintiffs allege that Defendant Stephanie Victoria Allen p/k/a Stefflon Don ("Stefflon Don") is an individual residing in London, England and doing business in and with the state of California, including in this judicial district.

32. Upon information and belief, Plaintiffs allege that Defendant Nick Rivera Caminero p/k/a Nicky Jam ("Nicky Jam") is an individual residing in Miami, Florida and doing business in and with the state of California, including in this judicial district.

33. Upon information and belief, Plaintiffs allege that Defendant Sebastián Obando Giraldo p/k/a Sebastian Yatra ("Sebastian Yatra") is an individual residing in Colombia and doing business in and with the state of California, including in this judicial district.

34. Upon information and belief, Plaintiffs allege that Defendant Pablo Arevalo Llano ("Llano") is an individual residing in Miami, Florida and doing business in and with the state of California, including in this judicial district.

35. Upon information and belief, Plaintiffs allege that Defendant Carlos Efrén Reyes Rosado p/k/a Farruko ("Farruko") is an individual residing in San Juan, Puerto Rico and doing business in and with the state of California, including in this judicial district.

36. Upon information and belief, Plaintiffs allege that Defendant Raúl Alejandro Ocasio Ruiz p/k/a Rauw Alejandro ("Rauw Alejandro") is an individual residing in Miami, Florida and doing business in and with the state of California, including in this judicial district.

37. Upon information and belief, Plaintiffs allege that Defendant Kobalt Music Publishing Ltd. ("Kobalt") is an English private limited company doing business in and with the state of California, including in this judicial district.

38. Upon information and belief, Plaintiffs allege that Kobalt Music Publishing America Inc. is a Delaware Corporation with a principal place of business at 2 Gansevoort Street 6th Floor, New York, NY 10014, and registered to do business in the state of California.

39. Upon information and belief, Plaintiffs allege that Defendant Carlos Ortiz Rivera p/k/a Chris Jeday or Chris Jedi ("Chris Jeday") is an individual residing in San Juan, Puerto Rico and doing business in and with the state of California, including in this judicial district.

40. Upon information and belief, Plaintiffs allege that Defendant Juan G Rivera Vasquez p/k/a Gaby Music ("Gaby Music") is an individual residing in San Juan, Puerto Rico and doing business in and with the state of California, including in this judicial district.

41. Upon information and belief, Plaintiffs allege that Defendant Emmanuel Gazmey Santiago p/k/a Anuel AA ("Anuel AA") is an individual residing in San Juan, Puerto Rico and doing business in and with the state of California, including in this judicial district.

42. Upon information and belief, Plaintiffs allege Defendant Llandel Veguilla Malavé p/k/a Yandel ("Yandel") is an individual residing in San Juan, Puerto Rico and doing business in and with the state of California, including in this judicial district.

43. Upon information and belief, Plaintiffs allege that Defendant Juan Carlos Salinas Jr. p/k/a Play ("Play") is an individual residing in Dallas, Texas and doing business in and with the state of California, including in this judicial district.

44. Upon information and belief, Plaintiffs allege that Defendant Oscar Edward Salinas p/k/a Skillz ("Skillz") is an individual residing in Dallas, Texas and doing business in and with the state of California, including in this judicial district.

45. Upon information and belief, Plaintiffs allege that Defendant Francisco Saldaña p/k/a Luny ("Luny") is an individual residing in San Juan, Puerto Rico and doing business in and with the state of California, including in this judicial district.

46. Upon information and belief, Plaintiffs allege that Defendant Víctor B Cabrera p/k/a Tunes ("Tunes") is an individual residing in San Juan, Puerto Rico and doing business in and with the state of California, including in this judicial district.

47. Upon information and belief, Plaintiffs allege that Defendant Carlos Isaías Morales Williams, p/k/a Sech ("Sech") is an individual residing in Panama

City, Panama and doing business in and with the state of California, including in this judicial district.

48. Upon information and belief, Plaintiffs allege that Defendant Urbani Mota Cedeño p/k/a DJ Urba ("DJ Urba") is an individual residing in San Juan, Puerto Rico and doing business in and with the state of California, including in this judicial district.

49. Upon information and belief, Plaintiffs allege that Defendant Marcos Masis p/k/a Tainy ("Tainy") is an individual residing in San Juan, Puerto Rico and doing business in and with the state of California, including in this judicial district.

50. Upon information and belief, Plaintiffs allege that Defendant Juan Luis Morera Luna p/k/a Wisin ("Wisin")[1] is an individual residing in San Juan, Puerto Rico and doing business in and with the state of California, including in this judicial district.

51. Upon information and belief, Plaintiffs allege that Defendant Sony/ATV Music Publishing (UK) Limited ("Sony/ATV") is an English private limited company with offices in Santa Monica, California.

52. Upon information and belief, Plaintiffs allege that Defendant Sony Music Entertainment US Latin LLC ("Sony Latin") is a Delaware Limited Liability Company registered to do business in California.

53. Upon information and belief, Plaintiffs allege that Defendants UMG Recordings, Inc., individually and doing business as "Universal Music Latin Entertainment." "Geffen Records" and "Machette Records" (collectively, "UMG"), are California corporations.

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[1] Service upon Wisin is currently the subject of Plaintiffs' *ex parte* motion (Dkt. 299), and should that motion be denied, Wisin will be dismissed without prejudice pursuant to the Case Administration Plan (Dkt. 143).

54. Upon information and belief, Plaintiffs allege that Defendant El Cartel Records, Inc. ("El Cartel") is a corporation owned and/or operated, in whole or in part, by UMG from UMG's California offices, and does business in and with the state of California and with this district.

55. Upon information and belief, Plaintiffs allege that Defendant Gasolina Publishing Co., ("GPC") is a publishing company registered with ASCAP and doing business in and with the state of California, including in this judicial district.

56. Upon information and belief, Plaintiffs allege that Defendant Abraham Mateo Chamorro p/k/a Abraham Mateo ("Mateo") is a Spanish individual residing in California and doing business in and with the state of California, including in this judicial district.

57. Upon information and belief, Plaintiffs allege that Defendant Javier Alexander Salazar p/k/a Alex Sensation ("Alex Sensation") is a Columbian individual residing in Manhattan, New York and doing business in and with the state of California, including in this judicial district.

58. Upon information and belief, Plaintiffs allege that Defendant Larissa de Marcedo Machado p/k/a Anitta ("Anitta") is a Brazilian individual living in Rio de Janeiro, Brazil and doing business in and with the state of California, including in this judicial district.

59. Upon information and belief, Plaintiffs allege that Defendant Justin Rafael Quiles Rivera p/k/a Justin Quiles or J Quiles ("Justin Quiles") is a Puerto Rican individual living in Miami, Florida and doing business in and with the state of California, including in this judicial district.

60. Upon information and belief, Plaintiffs allege that Defendant Peermusic III, Ltd. ("Peermusic") is a Delaware Corporation with a principal place of business at 901 West Alameda Avenue, Suite 108 Burbank, California and doing business in and with the state of California, including in this judicial district.

61. Upon information and belief, Plaintiffs allege that Defendant Pulse Records, Inc. ("Pulse") is a California Corporation with a principal place of business at 2840 Rowena Ave. Los Angeles, California 90039 and doing business in and with the state of California, including in this judicial district.

62. Upon information and belief, Plaintiffs allege that Defendant Alexander Delgado Hernandez and Defendant Randy Malcom Martinez collectively professionally known as the group Gente De Zona ("Gente de Zona") are Cuban individuals living in Miami, Florida and doing business in and with the state of California, including in this district.

63. Upon information and belief, Plaintiffs allege that Defendant Austin Agustin Santos p/k/a Arcangel ("Arcangel") is an individual living in New York City and Puerto Rico and doing business in and with the state of California, including in this district.

64. Upon information and belief, Plaintiffs allege that Defendant Rafael Castillo Torres p/k/a De La Ghetto ("De La Ghetto") is an individual living in New York City and Puerto Rico and doing business in and with the state of California, including in this district.

65. Upon information and belief, Plaintiffs allege that Defendant Jesus Manuel Nieves Cortez p/k/a Jhayco or Jhay Cortez ("Jhay Cortez") is an individual living in New Jersey and Puerto Rico and doing business in and with the state of California, including in this district.

66. Upon information and belief, Plaintiffs allege that Defendant Andy Clay Cruz p/k/a Andy Clay ("Andy Clay") is an individual living in Miami, Florida and doing business in and with the state of California, including in this district.

67. Upon information and belief, Plaintiffs allege that Edgar Semper and Defendant Xavier Semper collectively professionally known as the group Mambo

Kingz ("Mambo Kingz") are individuals living in Puerto Rico and doing business in and with the state of California, including in this district.

68. Upon information and belief, Plaintiffs allege that Defendant Luian Malave p/k/a DJ Luian ("DJ Luian") is an individual living in Puerto Rico and doing business in and with the state of California, including in this district.

69. Upon information and belief, Plaintiffs allege that Sony Music Publishing, LLC ("SMP") is a Delaware Limited Liability Company with offices located in Los Angeles, California and doing business in and with the state of California, including in this district.

70. Upon information and belief, Plaintiffs allege that Defendant Mauricio Alberto Reglero Rodriguez p/k/a Mau ("Mau") is an individual living in Miami, Florida and doing business in and with the state of California, including in this district.

71. Upon information and belief, Plaintiffs allege that Defendant Ricardo Andres Reglero Rodriguez p/k/a Ricky ("Ricky") is an individual residing in Miami, Florida and doing business in and with the state of California, including in this judicial district. Ricky and Mau perform as a duo professionally known as Mau & Ricky ("Mau & Ricky").

72. Upon information and belief, Plaintiffs allege that Defendant Andres Torres p/k/a Andres Torres ("Andres Torres") is an individual residing in Los Angeles, California and doing business in and with the state of California, including in this judicial district.

73. Upon information and belief, Plaintiffs allege that Defendant Jorge Valdes Vasquez p/k/a Dimelo Flow ("Dimelo Flow") is an individual residing in Tampa, Florida and doing business in and with the state of California, including in this judicial district.

74. Upon information and belief, Plaintiffs allege that Defendant Maybach Music Group, LLC ("Maybach") is a Florida Limited Liability Company with a principal place of business in Mississippi and doing business in and with the state of California, including in this judicial district.

75. Upon information and belief, Plaintiffs allege that Defendant Cinq Music Group, LLC ("Cinq Music") is a California Limited Liability Company with a principal place of business at Los Angeles, California and doing business in and with the state of California, including in this judicial district.

76. Upon information and belief, Plaintiffs allege that Defendant Cinq Music Publishing, LLC ("Cinq Publishing") is a California Limited Liability Company with a principal place of business at Los Angeles, California and doing business in and with the state of California, including in this judicial district.

77. Upon information and belief, Plaintiffs allege that Defendant Egbert Rosa Cintron p/k/a Fino Como El Haze ("Haze") is an individual residing in Tampa, Florida and doing business in and with the state of California, including in this judicial district.

78. Upon information and belief, Plaintiffs allege that Defendant Real Hasta la Muerte, LLC ("RHLM") is a Florida Limited Liability Company with a principal place of business at 10421 SW 89th Ave. Miami, Florida and doing business in and with the state of California, including in this judicial district.

79. Upon information and belief, Plaintiffs allege that Defendant Nelson Diaz Martinez p/k/a DJ Nelson ("DJ Nelson") is an individual residing in Puerto Rico and doing business in and with the state of California, including in this judicial district.

80. Upon information and belief, Plaintiffs allege that Defendant Daniel Oviedo p/k/a Ovy on the Drums ("Ovy on the Drums") is an individual residing in

Miami, Florida and doing business in and with the state of California, including in this judicial district.

81. Upon information and belief, Plaintiffs allege that Defendant Carbon Fiber Music, Inc. ("Carbon Fiber") is a Florida Corporation with a principal place of business at 14125 NW 80th Ave; 401, Miami Lakes, Florida 33016 and doing business in and with the state of California, including in this judicial district.

82. Upon information and belief, Plaintiffs allege that Defendant Enrique Iglesias p/k/a Enrique Iglesias ("Enrique Iglesias") is an individual residing in Miami, Florida and doing business in and with the state of California, including in this judicial district.

83. Upon information and belief, Plaintiffs allege that Defendant Rimas Music, LLC ("Rimas") is a Florida Limited Liability Company with a principal place of business at 333 S.E. 2nd Avenue Suite 3200, Miami, Florida 33131 and doing business in and with the state of California, including in this judicial district.

84. Upon information and belief, Plaintiffs allege that Defendant Benito Antonio Martinez Ocasio p/k/a Bad Bunny ("Bad Bunny") is an individual residing in Miami, Florida, Los Angeles, California, Puerto Rico and doing business in and with the state of California, including in this judicial district.

85. Upon information and belief, Plaintiffs allege that Defendant Felix Ortiz Torres p/k/a Zion ("Zion") is an individual living in Puerto Rico and doing business in and with the state of California, including in this district.

86. Upon information and belief, Plaintiffs allege that Defendant Gabriel Pizarro p/k/a Lennox ("Lennox") is an individual residing in Puerto Rico and doing business in and with the state of California, including in this judicial district. Zion and Lennox perform as a duo professionally known as Zion & Lennox ("Zion & Lennox").

87. Upon information and belief, Plaintiffs allege that Defendant Aura Music, LLC ("Aura") is a Florida Limited Liability Company with a principal place of business at 1759 Avenida Del Sol, Boca Raton, Florida 33432 and doing business in and with the state of California, including in this judicial district.

88. Upon information and belief, Plaintiffs allege that Defendant Freddy Montalvo Jr. p/k/a Freddy El Synthethyzer ("Freddy") is an individual living in Puerto Rico and doing business in and with the state of California, including in this judicial district. Freddy and Jose Cruz p/k/a ("Phantoms") perform as a duo professionally known as SubeloNeo ("SubeloNeo").

89. Upon information and belief, Plaintiffs allege that Defendant Miguel Andres Martinez Perea p/k/a Slow Mike ("Slow Mike") is an individual residing in Miami Florida and doing business in and with the state of California, including in this judicial district.

90. Upon information and belief, Plaintiffs allege that Defendant Christian Mena p/k/a Saga WhiteBlack ("Saga WhiteBlack") is an individual residing in Miami Florida and doing business in and with the state of California, including in this judicial district.

91. Upon information and belief, Plaintiffs allege that Defendant Vladimir Felix p/k/a DJ Blass ("DJ Blass") is an individual residing in Miami, Florida and doing business in and with the state of California, including in this judicial district.

92. Upon information and belief, Plaintiffs allege that Defendant Orlando Javier Valle Vega p/k/a Chencho Corleone("Chencho") is an individual living in Puerto Rico and doing business in and with the state of California, including in this judicial district.

93. Upon information and belief, Plaintiffs allege that Defendant Edwin Vasquez Vega p/k/a Maldy ("Maldy") is an individual residing in Puerto Rico and

doing business in and with the state of California, including in this judicial district. Chencho and Maldy perform as a duo professionally known as Plan B ("Plan B").

94. Upon information and belief, Plaintiffs allege that Defendant Hipgnosis Songs Group, LLC ("Hipgnosis") is a Delaware Limited Liability Company registered to do business in the state of California with a principal place of business at 15503 Ventura Blvd. Suite 300, Encino, CA 91436 and doing business in and with the state of California, including in this judicial district.

95. Upon information and belief, Plaintiffs allege that Defendant Kemosabe Records, LLC ("Kemosabe") is a Delaware Limited Liability Company registered to do business in the state of California and doing business in and with the state of California, including in this judicial district. Upon information and belief, Kemosabe is owned by Sony Music Entertainment, based in Los Angeles, California.

96. Upon information and belief, Plaintiffs allege that Defendant Rebbeca Marie Gomez p/k/a Becky G ("Becky G") is an individual residing in Los Angeles, California and doing business in and with the state of California, including in this judicial district.

97. Upon information and belief, Plaintiffs allege that Defendant Juan Luis Londono Arias p/k/a Maluma ("Maluma") is an individual residing in Miami, Florida and Columbia doing business in and with the state of California, including in this judicial district.

98. Upon information and belief, Plaintiffs allege that Defendant Natalia Amapola Alexandra Gutierrez Batista p/k/a Natti Natasha ("Natti Natasha") is an individual residing in Miami, Florida and doing business in and with the state of California, including in this judicial district.

99. Upon information and belief, Plaintiffs allege that Defendant Camilo Echeverria p/k/a Camilo ("Camilo") is an individual residing in Miami Florida and doing business in and with the state of California, including in this judicial district.

100. Upon information and belief, Plaintiffs allege that Defendant Concord Music Group, LLC ("Concord") is a Delaware Limited Liability Company registered to do business in the state of California with an office at 5750 Wilshire Blvd Suite 450, Los Angeles, California 90036 and doing business in and with the state of California, including in this judicial district.

101. Upon information and belief, Plaintiffs allege that Defendant Pedro David Daleccio Torres p/k/a Dalex ("Dalex") is an individual residing in Miami, Florida and doing business in and with the state of California, including in this judicial district.

102. Upon information and belief, Plaintiffs allege that Defendant Manuel Turizo Zapata p/k/a Manuel Turizo ("Manuel Turizo") is an individual residing in Miami, Florida and doing business in and with the state of California, including in this judicial district.

103. Upon information and belief, Plaintiffs allege that Defendant Anton Alvarez Alfaro p/k/a C. Tangana ("C. Tangana") is an individual residing in Columbia and doing business in and with the state of California, including in this judicial district.

104. Upon information and belief, Plaintiffs allege that Defendant Alejandro Rengifo p/k/a Cali ("Cali") is an individual living in Colombia and doing business in and with the state of California, including in this judicial district.

105. Upon information and belief, Plaintiffs allege that Defendant Maurivio Rengifo p/k/a El Dandee ("El Dandee") is an individual residing in Colombia and doing business in and with the state of California, including in this judicial district. Cali and El Dandee perform as a duo professionally known as Cali & El Dandee ("Cali & El Dandee").

106. Upon information and belief, Plaintiffs allege that Defendant Jesus Alberto Navarro is an individual living in New York, New York and doing business in and with the state of California, including in this judicial district.

107. Upon information and belief, Plaintiffs allege that Defendant Julio Ramirez Eguia is an individual residing in San Diego, California and doing business in and with the state of California, including in this judicial district.

108. Upon information and belief, Plaintiffs allege that Defendant Gilberto Marin Espinoza is an individual residing in Playa Del Carmen, Mexico and doing business in and with the state of California, including in this judicial district. Jesus Alberto Navarro, Julio Ramirez Equia, and Gilberto Marin Espinoza are professionally known as the band Reik ("Reik").

109. Upon information and belief, Plaintiffs allege that Defendant Danna Paola Rivera Munguia p/k/a Danna Paola ("Danna Paola") is an individual living in Mexico City, Mexico and doing business in and with the state of California, including in this district.

110. Upon information and belief, Plaintiffs allege that Defendant Michael Egred Mejia p/k/a Mike Bahia ("Mike Bahia") is an individual living in Colombia and doing business in and with the state of California, including in this judicial district.

111. Upon information and belief, Plaintiffs allege that Defendant Carlos Alberto Vives Restrepo p/k/a Carlos Vives ("Carlos Vives") is an individual living in Miami, Florida and Colombia and doing business in and with the state of California, including in this judicial district.

112. Upon information and belief, Plaintiffs allege that Defendant Enrique Martin Morales p/k/a Ricky Martin ("Ricky Martin") is an individual living in Beverly Hills, California and doing business in and with the state of California, including in this judicial district.

113. Upon information and belief, Plaintiffs allege that Defendant Marcos Ramirez is an individual living in Puerto Rico and doing business in and with the state of California, including in this judicial district.

114. Upon information and belief, Plaintiffs allege that Defendant Victor R. Torres is an individual living in Puerto Rico and doing business in and with the state of California, including in this judicial district.

115. Upon information and belief, Marcos Ramirez and Victor R. Torres perform and are professionally known as Los Legendarios (collectively "Los Legendarios").

116. Upon information and belief, Plaintiffs allege that Defendant Julio Alberto Cruz Garcia p/k/a Casper Magico ("Casper Magico") is an individual living in Puerto Rico and doing business in and with the state of California, including in this judicial district.

117. Upon information and belief, Plaintiffs allege that Defendant Vydia, Inc. ("Vydia") is a Delaware Corporation registered to do business in the state of California with an office at 101 Crawford Corner Road Holmdel, New Jersey 07733 and doing business in and with the state of California, including in this judicial district.

118. Upon information and belief, Plaintiffs allege that Defendant Richard Camacho is an individual living in Miami, Florida doing business in and with the state of California, including in this judicial district.

119. Upon information and belief, Plaintiffs allege that Defendant Erick Brian Colon is an individual residing in Miami, Florida and doing business in and with the state of California, including in this judicial district.

120. Upon information and belief, Plaintiffs allege that Defendant Christopher Velez is an individual residing in Miami, Florida and doing business in and with the state of California, including in this judicial district.

121. Upon information and belief, Plaintiffs allege that Defendant Zabdiel De Jesus is an individual residing in Miami, Florida and doing business in and with the state of California, including in this judicial district. Defendants Richard Camacho, Erick Brian Colon, Christopher Velez, and Zabdiel De Jesus perform and are professionally known as the Latin American boy band CNCO (collectively "CNCO").

122. Upon information and belief, Plaintiffs allege that Defendant Salomon Villada Hoyos p/k/a Feid ("Feid") is an individual living in Miami, Florida and doing business in and with the state of California, including in this judicial district.

123. Upon information and belief, Plaintiffs allege that Defendant Solar Music Rights management Limited ("SOLAR") is an English Limited Liability Company doing business in and with the state of California, including in this judicial district.

124. Upon information and belief, Plaintiffs allege that Defendant Greeicy Yeliana Rendon Ceballos p/k/a Greeicy ("Greeicy") is an individual living in Columbia and doing business in and with the state of California, including in this judicial district.

125. Upon information and belief, Plaintiffs allege that Defendant Daniel Alejandro Morales Reyes p/k/a Danny Ocean ("Danny Ocean") is an individual living in Miami, Florida and doing business in and with the state of California, including in this judicial district.

126. Upon information and belief, Plaintiffs allege that Defendant William Sami Etienne Grigahcine p/k/a DJ Snake ("DJ Snake") is an individual living in France and doing business in and with the state of California, including in this judicial district.

127. Upon information and belief, Plaintiffs allege that Defendant Glad Empire Live, LLC. ("Glad Empire") is a Puerto Rican Limited Liability Company

doing business in and with the state of California, including in this judicial district. Upon information and belief, Glad Empire is owned and operated by Get Low Records, LLC a Florida Limited Liability Company.

128. Upon information and belief, Plaintiffs allege that Defendant Luis Angel O'Neill Laureano p/k/a O'Neill ("O'Neill") is an individual living in Miami Florida and doing business in and with the state of California, including in this judicial district.

129. Upon information and belief, Plaintiffs allege that Defendant Hear This Music, LLC ("Hear This Music") is a Puerto Rican Limited Liability Company doing business in and with the state of California, including in this judicial district.

130. Upon information and belief, Plaintiffs allege that Defendant Marcos D. Perez p/k/a Sharo Towers or Sharo Torres ("Sharo Towers") is an individual living in Miami, Florida and doing business in and with the state of California, including in this judicial district.

131. Upon information and belief, Plaintiffs allege that Defendant Martha Ivelisse Pesante Rodriguez p/k/a Ivy Queen ("Ivy Queen") is an individual residing in Puerto Rico and Miami, Florida and doing business in and with the state of California, including in this judicial district.

132. Upon information and belief, Plaintiffs allege that Defendant Jose Alvaro Osorio Balvin p/k/a J Balvin ("J Balvin") is an individual residing in New York and Columbia and doing business in and with the state of California, including in this judicial district.

133. Upon information and belief, Plaintiffs allege that Defendant Thomas Wesley Pentz p/k/a Diplo ("Diplo") is an individual residing in Los Angeles, California and doing business in and with the state of California, including in this judicial district.

134. Upon information and belief, Plaintiffs allege that Defendant Eric Alberto-Lopez p/k/a Ape Drums ("Ape Drums") is an individual residing in Miami, Florida and doing business in and with the state of California, including in this judicial district.

135. Upon information and belief, Plaintiffs allege that Defendants Diplo, and Ape Drums perform and are professionally known as the group Major Lazer (collectively "Major Lazer").

136. Upon information and belief, Plaintiffs allege that Defendant Mad Decent Publishing, LLC. ("Mad Decent Publishing") is a Delaware Limited Liability Company registered to do business in California and doing business in and with the state of California, including in this judicial district.

137. Upon information and belief, Plaintiffs allege that Defendant Mad Decent Protocol, LLC. ("Mad Decent") is a Pennsylvania Limited Liability Company registered to do business in California and doing business in and with the state of California, including in this judicial district.

138. Upon information and belief, Plaintiffs allege that Defendant Jason Joel Desrouleaux p/k/a Jason Derulo ("Jason Derulo") is an individual residing in Los Angeles, California and doing business in and with the state of California, including in this judicial district.

139. Upon information and belief, Plaintiffs allege that Defendant Joshua Christian Nanai p/k/a Jawsh 685 ("Jawsh 685") is an individual residing in Manurewa New Zealand and doing business in and with the state of California, including in this judicial district.

140. Upon information and belief, Plaintiffs allege that Defendant Julio Manuel Gonzalez Tavarez p/k/a Lenny Tavarez ("Lenny Tavarez") is an individual residing in Puerto Rico and doing business in and with the state of California, including in this judicial district.

141. Upon information and belief, Plaintiffs allege that Defendant Rich Music Inc. ("Rich Music") is a Delaware Corporation registered with a principal place of business in Miami Florida and doing business in and with the state of California, including in this judicial district.

142. Upon information and belief, Plaintiffs allege that Defendant Giencarlos Rivera p/k/a Yan Madmusick ("Yan Madmusick") is an individual residing in Miami, Florida and doing business in and with the state of California, including in this judicial district.

143. Upon information and belief, Plaintiffs allege that Defendant Jonathan Rivera p/k/a Yon Madmusick ("Yon Madmusick") is an individual residing in Miami Florida and doing business in and with the state of California, including in this judicial district.

144. Upon information and belief, Plaintiffs allege that Defendants Yon Madmusick and Yan Madmusick perform and are professionally known together as Madmusick (collectively "Madmusick").

145. Upon information and belief, Plaintiffs allege that Defendant Kevin Mauricio Jimenez Londono p/k/a Kevin ADG ("Kevin ADG") is an individual residing in Miami, Florida and doing business in and with the state of California, including in this judicial district.

146. Upon information and belief, Plaintiffs allege that Defendant Bryan Lezcano Chaverra p/k/a Chan El Genio ("Chan El Genio") is an individual residing in Miami, Florida and doing business in and with the state of California, including in this judicial district.

147. Upon information and belief, Plaintiffs allege that Defendants Kevin ADG and Chan El Genio perform and are professionally known together as The Rude Boyz (collectively "Rude Boyz").

148. Upon information and belief, Plaintiffs allege that Defendant Ernesto Fidel Padilla p/k/a Nesty ("Nesty") is an individual residing in Miami, Florida and doing business in and with the state of California, including in this judicial district.

149. Upon information and belief, Plaintiffs allege that Defendant Dimelo Vi LLC ("Dimelo Vi") is a Puerto Rican Limited Liability Company with a principal place of business in San Juan, Puerto Rico and doing business in and with the state of California, including in this judicial district.

150. Upon information and belief, Plaintiffs allege that Defendant VP Records Corporation ("VP Records") is a Puerto Rican Corporation with a principal place of business in Puerto Rico and doing business in and with the state of California, including in this judicial district.

151. Upon information and belief, Plaintiffs allege that Defendant Jose Aponte Santi p/k/a Hi Music Hi Flow ("Hi Music Hi Flow") is an individual residing in Puerto Rico and doing business in and with the state of California, including in this judicial district.

152. Upon information and belief, Plaintiffs allege that Defendant Mr. 305, Inc. ("Mr. 305") is a Florida Corporation with a principal place of business at 218 NW 24th Street unit 310, Miami, Florida 33127 and doing business in and with the state of California, including in this judicial district.

153. Upon information and belief, Plaintiffs allege that Defendant Eric Perez Rovira p/k/a Eric Duars ("Eric Duars") is an individual residing in Puerto Rico and doing business in and with the state of California, including in this judicial district.

154. Upon information and belief, Plaintiffs allege that Defendant Duars Entertainment, Corp. (collectively "Duars Ent.") is a Puerto Rican Corporation doing business in and with the state of California, including in this judicial district.

155. Upon information and belief, Plaintiffs allege that Defendant Isolation Network Inc. doing business as Ingrooves Music Group (collectively "Ingrooves") is

a California Corporation with a principal place of business at 2200 Colorado Ave. Santa Monica, California 90404 and doing business in and with the state of California, including in this judicial district.

156. Upon information and belief, Plaintiffs allege that Defendant Andres Felipe Zapata Gaviria p/k/a Wolfine ("Wolfine") is an individual residing in Columbia and doing business in and with the state of California, including in this judicial district.

157. Upon information and belief, Plaintiffs allege that Defendant Empire Distribution, Inc. doing business as Empire (collectively "Empire") is a California Corporation with a principal place of business at 235 Pine Street 24th floor, San Francisco, California 94104 and doing business in and with the state of California, including in this judicial district.

158. Upon information and belief, Plaintiffs allege that Defendant Paulo Ezequiel Londra Farias p/k/a Paulo Londra ("Paulo Londra") is an individual residing in Argentina and doing business in and with the state of California, including in this judicial district.

159. Upon information and belief, Plaintiffs allege that Defendant Aubrey Drake Graham p/k/a Drake ("Drake")[2] is an individual residing in Los Angeles, California and doing business in and with the state of California, including in this judicial district.

160. Upon information and belief, Plaintiffs allege that Defendant OVO Sound, LLC ("OVO") is a California Limited Liability Company operating out of

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[2] Service upon Drake is currently the subject of Plaintiffs' *ex parte* motion (Dkt. 299), and should that motion be denied, Drake will be dismissed without prejudice pursuant to the Case Administration Plan (Dkt. 143).

Toronto, Canada and doing business in and with the state of California, including in this judicial district.

161. Upon information and belief, Plaintiffs allege that Defendant Flow La Movie, Inc. ("Flow La Movie") is a Florida Corporation doing business in and with the state of California, including in this judicial district.

162. Upon information and belief, Plaintiffs allege that Defendant Rosalia Vila I Tobella p/k/a Rosalia ("Rosalia") is an individual residing in Miami, Florida and doing business in and with the state of California, including in this judicial district.

163. Upon information and belief, Plaintiffs allege that Defendant Jose Angel Lopez Martinez p/k/a Jay Wheeler ("Jay Wheeler") is an individual residing in Puerto Rico and doing business in and with the state of California, including in this judicial district.

164. Upon information and belief, Plaintiffs allege that Defendant Silvestre Francisco Dangond Corrales p/k/a Silvestre Dangond ("Silvestre Dangond") is an individual residing in Columbia and doing business in and with the state of California, including in this judicial district.

165. Upon information and belief, Plaintiffs allege that Defendant Geoffrey Royce Rojas p/k/a Prince Royce ("Prince Royce") is an individual residing in New York, New York and doing business in and with the state of California, including in this judicial district.

166. Upon information and belief, Plaintiffs allege that Defendant Luis Antonia Quinones Garcia p/k/a Nio Garcia ("Nio Garcia") is an individual residing in Puerto Rico and doing business in and with the state of California, including in this judicial district.

167. Upon information and belief, Plaintiffs allege that Defendant The Royalty Network, Inc. ("Royalty") is a New York Corporation registered to do

business in California with an office at 12711 Ventura Blvd. #217, Studio City, CA 91604 and doing business in and with the state of California, including in this judicial district.

168. Upon information and belief, Plaintiffs allege that Defendant Manuel Enrique Cortes Cleghorn p/k/a Rike Music ("Rike Music") is an individual residing in Panama and Miami, Florida and doing business in and with the state of California, including in this judicial district.

169. Upon information and belief, Plaintiffs allege that Defendant WK Records, LLC ("WK Records") is a Florida Limited Liability Company doing business in and with the state of California, including in this judicial district.

170. Upon information and belief, Plaintiffs allege that Defendant La Base Music Group, LLC ("La Base") is a Florida Limited Liability Company doing business in and with the state of California, including in this judicial district.

171. Defendants Does 1 through 20 (collectively, "Doe Defendants") (altogether with the above-referenced parties, "Defendants") are other parties not yet identified who have infringed Plaintiffs' copyrights, have contributed to the infringement of Plaintiffs' copyrights, and/or have engaged in one or more of the wrongful practices alleged herein. The true names, whether corporate, individual, or otherwise, of Doe Defendants are presently unknown to Plaintiffs, who therefore sue said Defendants by such fictitious names, and will seek leave to amend this Complaint to show their true names and capacities when the same have been ascertained.

172. Upon information and belief, Plaintiffs allege that each of the Defendants was the agent, affiliate, officer, director, manager, principal, alter-ego, and/or employee of the remaining Defendants, and was at all times acting within the scope of such agency, affiliation, alter-ego relationship, and/or employment; and actively participated in, subsequently ratified, and/or adopted the acts or conduct

alleged herein, with full knowledge of all the facts and circumstances of the alleged violations of Plaintiffs' rights and the damages to Plaintiffs proximately caused thereby.

Factual Background

173. Plaintiff Cleveland Constantine Browne, p/k/a Clevie ("Mr. Browne"), is a world-renowned influential and innovative composer, musician, and producer known for, *inter alia*, pioneering the use of drum machines in reggae.

174. Wycliffe Anthony Johnson, p/k/a Steely ("Mr. Johnson"), was a likewise influential and innovative composer, musician, and producer.

175. Together, Mr. Browne and Mr. Johnson formed the duo "Steely & Clevie," and worked on numerous genre-defining projects. Mr. Browne and Mr. Johnson worked with such legendary artists as Bob Marley, Bunny Wailer, Jimmy Cliff, Gregory Isaacs, Ziggy Marley, and Lee Scratch Perry.

176. Plaintiff Steely & Clevie Productions Ltd. is the production company of Mr. Browne and Mr. Johnson.

177. Ephraim Barrett was a producer who was professionally known as "Count Shelly."

178. Denis Halliburton is a musician who is professionally known as "Dennis the Menace."

179. In 1989, Mr. Browne and Mr. Johnson wrote and recorded the instrumental song *Fish Market* ("*Fish Market*" or the "Song"). They own the copyright for the Song and the sound recording and composition for the Song are registered with the U.S. Copyright Office.

180. *Fish Market* is an original work, including, without limitation, an original drum pattern that differentiates it from prior works. *Fish Market* features, *inter alia*, a programmed kick, snare, and hi-hat playing a one bar pattern; percussion instruments, including a tambourine playing through the entire bar, a synthesized

'tom' playing on beats one and three, and timbales that play a roll at the end of every second bar and free improvisation over the pattern for the duration of the song; and a synthesized Bb (b-flat) bass note on beats one and three of each bar, which follows the aforementioned synthesized 'tom' pattern. The foregoing combination of elements is original to Mr. Browne and Mr. Johnson and was groundbreaking upon its creation.

181. Mr. Browne and Mr. Johnson co-authored the song titled *Dem Bow* (roughly, "They Bow" in English) with Shabba Ranks and co-own, with Shabba Ranks, the song's copyrights. The composition for *Dem Bow* is registered with the U.S. Copyright Office. *Dem Bow* was a massive hit, and a critical and commercial success, in the international reggae dancehall scene. Indeed, *Dem Bow's* instrumental (an alternative mix of *Fish Market*, based on the same multi-track recording) is iconic and has been widely copied in songs in the reggaeton music genre.[3]

182. In 1990, after *Dem Bow*'s release and success and at the direction of Mr. Barrett, Mr. Halliburton, performed the instrumental of the song "*Dem Bow*," which incorporates the "*Fish Market*" composition, to create a derivative work that will be referred to hereinafter as the "*Pounder Riddim*." The *Pounder Riddim* was then used to create the sound recordings of *Ellos Benia*, a Spanish language version of "*Dem Bow*," and *Pounder Dub Mix II* ("*Pounder*").

183. For the "*Pounder Riddim*,"[4] Denis Halliburton copied *Dem Bow*'s instrumental, sound, arrangement, and composition, including the drum pattern, the drum components, including the kick, snare, hi-hat, tom and timbales as well as

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[3] *See, e.g.*, Wayne Marshall, "Reggaeton," pgs. 36-48, Raquel Z. Rivera, Duke University Press (2009).

[4] The term "riddim" in Reggae Dancehall refers to an instrumental track that can be used to record multiple different songs. The term "riddim" in dancehall, similar to the term beat in hip hop, encompasses the entire track without vocals.

the full bassline. The composition played by Halliburton is virtually identical to *Fish Market*.

184. The *Fish Market* composition is captured in the sound recordings for the *Pounder Riddim* and *Pounder*. The sound recording for *Pounder* was released first to the U.S. public in or around 1990 and has been sampled by numerous Defendants, and each of them, as alleged herein.

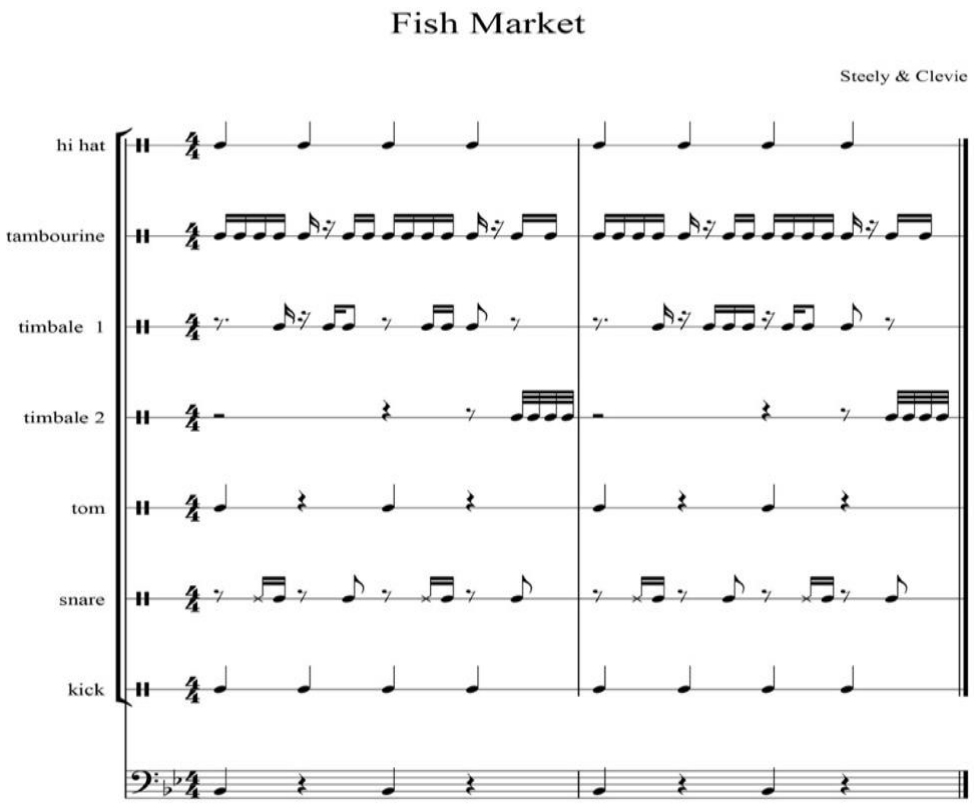
185. The sound recording for *Fish Market* was recorded in Jamaica and originally released first in the United States through VP Records before it was released in Jamaica.

186. *Dem Bow* was originally released in the United States through VP Records before it was released in Jamaica.

187. The sound recordings for *Pounder Riddim and Pounder* were created in the United States.

188. *Pounder Riddim* and *Pounder* were released to the U.S. market in 1990 on vinyl by the label Shelly's Records in New York. *Pounder* has been widely copied and/or sampled[5] by the Defendants in this action, and each of them. Transcripts of portions of *Fish Market* and the *Pounder Riddim* are shown below. Any copying, interpolating, or sampling of the *Pounder Riddim* is a copying or interpolation of *Fish Market's* composition.

[5] The prolific sampling of *Pounder* in reggaeton is described in the acclaimed documentary *LOUD: The history of Reggaeton*, from Spotify and Futuro Media and narrated by Martha Ivelisse Pesante Rodríguez p/k/a Ivy Queen, https://www.latinousa.org/loudthehistoryofreggaeton/ (last accessed July 29, 2022).



189. Plaintiffs possess copyright ownership and U.S. registrations for the *Fish Market* composition and sound recording, the *Dem Bow* composition, and the *Pounder* sound recording (and the composition captured thereupon due to the composition being copied from *Fish Market*) and the allegations made herein are for the violation of Plaintiffs' ownership and/or exclusive rights in the aforementioned compositions and sound recordings.

190. On information and belief, Plaintiff alleges that Defendants, and each of them, are responsible for the creation and exploitation of the works found and listed in **Exhibit A** attached hereto (collectively, the "Infringing Works"). The Infringing Works are each commercial songs that have garnered millions (and, for some, billions) of plays and streams, respectively, and resulted in significant revenue and profits to the Defendants, and each of them. Each party listed in the "Involved

Defendants" column of Exhibit A is responsible for the creation and/or exploitation of the listed Infringing Work.

191. On information and belief, Plaintiff alleges that Defendants never sought or obtained a license, authorization, or consent from Plaintiffs to use or copy the any elements, portions, or versions of *Fish Market*, *Dem Bow*, *Pounder*, or the other derivatives in which Plaintiffs own copyrights, in connection with any of the Infringing Works.

192. On information and belief, Plaintiff alleges that each of the Infringing Works, as described below, infringes on Plaintiffs' copyrights in the above-mentioned compositions and sound recordings. Despite notice of the infringement, Defendants, and each of them, continue to exploit, and generate revenue and profits from, the Infringing Works, in violation of Plaintiffs' rights in the works at issue.

193. As set forth below, the Infringing Works can be divided into 59 groups—(1) works written, recorded, and performed by the artist El Chombo; (2) works written, recorded, and performed by Luis Fonsi; and (3) works written, recorded, and performed by Daddy Yankee—along with a myriad of additional performers and featured artists on each of the respective works (4) works written, recorded, and performed by Abraham Mateo—along with a myriad of additional performers and featured artists on each of the respective works; (5) works written, recorded, and performed by Alex Sensation—along with a myriad of additional performers and featured artists on each of the respective works; (6) works written, recorded, and performed by Anitta—along with a myriad of additional performers and featured artists on each of the respective works; (7) works written, recorded, and performed by Anuel AA—along with a myriad of additional performers and featured artists on each of the respective works; (8) works written, recorded, and performed by Anuel AA & Ozuna-- along with a myriad of additional performers and featured artists on each of the respective works; (9) works written, recorded, and performed by

Bad Bunny—along with a myriad of additional performers and featured artists on each of the respective works; (10) works written, recorded, and performed by Becky G—along with a myriad of additional performers and featured artists on each of the respective works; (11) works written, recorded, and performed by Cali & El Dandee—along with a myriad of additional performers and featured artists on each of the respective works; (12) works written, recorded, and performed by Camilo—along with a myriad of additional performers and featured artists on each of the respective works; (13) works written, recorded, and performed by Carlos Vives—along with a myriad of additional performers and featured artists on each of the respective works; (14) works written, recorded, and performed by Casper Magico—along with a myriad of additional performers and featured artists on each of the respective works; (15) works written, recorded, and performed by CNCO—along with a myriad of additional performers and featured artists on each of the respective works; (16) works written, recorded, and performed by Dalex—along with a myriad of additional performers and featured artists on each of the respective works; (17) works written, recorded, and performed by Danna Paola—along with a myriad of additional performers and featured artists on each of the respective works; (18) works written, recorded, and performed by Danny Ocean—along with a myriad of additional performers and featured artists on each of the respective works; (19) works written, recorded, and performed by De La Ghetto—along with a myriad of additional performers and featured artists on each of the respective works; (20) works written, recorded, and performed by Dimelo Flow—along with a myriad of additional performers and featured artists on each of the respective works; (21) works written, recorded, and performed by DJ Snake—along with a myriad of additional performers and featured artists on each of the respective works; (22) works written, recorded, and performed by Drake—along with a myriad of additional performers and featured artists on each of the respective works; (23) works written, recorded, and performed

by Enrique Iglesias—along with a myriad of additional performers and featured artists on each of the respective works; (24) works written, recorded, and performed by Farruko—along with a myriad of additional performers and featured artists on each of the respective works; (25) works written, recorded, and performed by Feid—along with a myriad of additional performers and featured artists on each of the respective works; (26) works written, recorded, and performed by Gente De La Zona—along with a myriad of additional performers and featured artists on each of the respective works; (27) works written, recorded, and performed by Greeicy—along with a myriad of additional performers and featured artists on each of the respective works; (28) works written, recorded, and performed by Ivy Queen—along with a myriad of additional performers and featured artists on each of the respective works; (29) works written, recorded, and performed by J Balvin—along with a myriad of additional performers and featured artists on each of the respective works; (30) works written, recorded, and performed by Jason Derulo—along with a myriad of additional performers and featured artists on each of the respective works; (31) works written, recorded, and performed by Jawsh 685—along with a myriad of additional performers and featured artists on each of the respective works; (32) works written, recorded, and performed by Jay Wheeler—along with a myriad of additional performers and featured artists on each of the respective works; (33) works written, recorded, and performed by Jhay Cortez—along with a myriad of additional performers and featured artists on each of the respective works; (34) works written, recorded, and performed by Justin Quiles—along with a myriad of additional performers and featured artists on each of the respective works; (35) works written, recorded, and performed by Karol G—along with a myriad of additional performers and featured artists on each of the respective works; (36) works written, recorded, and performed by Lenny Tavarez—along with a myriad of additional performers and featured artists on each of the respective works; (37) works written, recorded, and

performed by Los Legendarios—along with a myriad of additional performers and featured artists on each of the respective works; (38) works written, recorded, and performed by Major Lazer—along with a myriad of additional performers and featured artists on each of the respective works; (39) works written, recorded, and performed by Maluma—along with a myriad of additional performers and featured artists on each of the respective works; (40) works written, recorded, and performed by Manuel Turizo—along with a myriad of additional performers and featured artists on each of the respective works; (41) works written, recorded, and performed by Myke Towers—along with a myriad of additional performers and featured artists on each of the respective works; (42) works written, recorded, and performed by Natti Natasha—along with a myriad of additional performers and featured artists on each of the respective works; (43) works written, recorded, and performed by Nicky Jam—along with a myriad of additional performers and featured artists on each of the respective works; (44) works written, recorded, and performed by Ozuna—along with a myriad of additional performers and featured artists on each of the respective works; (45) works written, recorded, and performed by Paulo Londra—along with a myriad of additional performers and featured artists on each of the respective works; (46) works written, recorded, and performed by Pitbull—along with a myriad of additional performers and featured artists on each of the respective works; (47) works written, recorded, and performed by Rauw Alejandro—along with a myriad of additional performers and featured artists on each of the respective works; (48) works written, recorded, and performed by Reik—along with a myriad of additional performers and featured artists on each of the respective works; (49) works written, recorded, and performed by Ricky Martin—along with a myriad of additional performers and featured artists on each of the respective works; (50) works written, recorded, and performed by Rosalia—along with a myriad of additional performers and featured artists on each of the respective works; (51) works written, recorded, and

performed by Sech—along with a myriad of additional performers and featured artists on each of the respective works; (52) works written, recorded, and performed by Silvestre Dangond—along with a myriad of additional performers and featured artists on each of the respective works; (53) works written, recorded, and performed by Sky—along with a myriad of additional performers and featured artists on each of the respective works; (54) works written, recorded, and performed by Wisin—along with a myriad of additional performers and featured artists on each of the respective works; (55) works written, recorded, and performed by Wisin & Yandel—along with a myriad of additional performers and featured artists on each of the respective works; (56) works written, recorded, and performed by Wolfine—along with a myriad of additional performers and featured artists on each of the respective works; (57) works written, recorded, and performed by Yandel—along with a myriad of additional performers and featured artists on each of the respective works; (58) works written, recorded, and performed by Zion & Lennox—along with a myriad of additional performers and featured artists on each of the respective works.

194. As set forth below, the entity defendants were involved in the exploitation, distribution, and publishing of each of the Infringing Works. The parties responsible for each song and the manner of copying alleged is either described below and/or can be found in **Exhibit A** attached hereto.

195. On information and belief, Plaintiff alleges that Defendants, and each of them, in reproducing, distributing, developing, and performing the Infringing Works, committed at least one act of copyright infringement in the United States that allowed for further infringement outside of the United States.

196. On information and belief, Plaintiff alleges that Defendants, and each of them, in reproducing, distributing, developing, and performing the Infringing Works, committed at least one act of copyright infringement in the United States and its territories that allowed for further infringement outside of the United States.

197. On information and belief, Plaintiff alleges that numerous Infringing Works were created at studios or other locations within the United States and that this creative process included reproducing, copying, and/or creating derivative works from the sound recordings and compositions for *Fish Market*, *Dem Bow*, and/or *Pounder*.

198. On information and belief, Plaintiff alleges that numerous Infringing Works were created at studios or other locations within the United States territories and that this creative process included reproducing, copying, and/or creating derivative works from the sound recordings and compositions for *Fish Market*, *Dem Bow*, and/or *Pounder*.

199. On information and belief, Plaintiff alleges that each of the Infringing Works was streamed, distributed, downloaded, uploaded, downloaded, performed and otherwise exploited within the United States, and its territories, and by United States residents, and that this creative process included reproducing, copying, and/or creating derivative works from the sound recordings and compositions for *Fish Market*, *Dem Bow*, and/or *Pounder*.

200. The copyrights for *Fish Market*'s sound recording and composition, *Dem Bow*'s composition, and *Pounder*'s sound recording have been registered with the U.S. Copyright Office. Plaintiffs have an ownership interest in each of the foregoing works.

El Chombo Allegations

201. On April 2, 2018, Sony, and Ultra released the single *Dame tu Cosita* by El Chombo.

202. On or about August 2018, Sony, and Ultra released an alternative mix of *Dame tu Cosita* by El Chombo, Pitbull, and Karol G.

203. Both recordings, the *Dame tu Cosita* and/or the *Dame Tu Cosita Remix*, were hit songs garnering millions (if not billions) of plays and streams, resulting in significant revenue and profits to Defendants.

204. The Infringing Works consist of rhythmic speech, drums, and percussion. The primary rhythm and drum sections of *Dame tu Cosita* and *Dame Tu Cosita Remix* consist of an unauthorized sample and/or a verbatim copy of elements from the Song.

205. Moreover, the composition of *Dame tu Cosita* substantially comprises the composition of *Fish Market*. The drum pattern of the *Dame tu Cosita* is the drum pattern of *Fish Market* set forth above. Two versions of the drum pattern are played. The first is one with a "stop" (i.e., a cut) on the third beat and silence on the fourth beat. The second is like the first, but with a continuous beat (i.e., with no stop). Among other things, as in *Fish Market*, the low drum (or bass) sound in the rhythm track of *Dame tu Cosita* plays on beats 1 and 3, is pitched at a Bb (B-flat). The main riffs of *Fish Market* are also included in the *Dame tu Cosita*, including the kick and snare pattern, the reinforcing of beats 1 and 3 on a low-pitched drum, and the sixteenth notes on the 'and' of beat 1 on the snare. The kick and snare drums are prominent in the *Dame tu Cosita* mix, just as in *Fish Market*.

206. For the same reasons, the composition of the *Dame Tu Cosita Remix* substantially comprises the composition of *Fish Market*.

207. A sample of audio from the recording of *Fish Market* is incorporated throughout *Dame Tu Cosita* and the *Dame Tu Cosita Remix*. Particularly, percussive elements mixed in the background of *Dame Tu Cosita* and the *Dame Tu Cosita Remix* correspond to the pattern and frequency bandwidth of sounds in *Fish Market*, including the timbales and tambourine—identifiable, key components of the Song.

<u>Luis Fonsi Allegations</u>

208. On or about June 3, 2021, UMG released the Luis Fonsi single entitled *Bésame*. Upon information and belief, Plaintiffs allege that *Bésame* was written, recorded, produced, distributed, and/or exploited by Defendants UMG, Warner, Luis Fonsi, Myke Towers, Cali, and Torres.

209. On or about June 14, 2018, UMG released the Luis Fonsi single entitled *Calypso*. Upon information and belief, Plaintiffs allege that *Calypso* was written, recorded, produced, distributed, and/or exploited by Defendants UMG, Warner, Sony, Luis Fonsi, Cali, Torres, Dyo, and Stefflon Don.

210. On or about April 23, 2019, UMG released the single *Date La Vuelta*. Upon information and belief, Plaintiffs allege that *Date La Vuelta* was written, recorded, produced, distributed, and/or exploited by Defendants UMG, Warner, Sony, UMP, Luis Fonsi, Cali, Torres, Llano, Nicky Jam, and Sebastian Yatra.

211. On or about January 12, 2017, UMG released the Luis Fonsi single *Despacito*. Upon information and belief, Plaintiffs allege that *Despacito* was written, recorded, produced, distributed, and/or exploited by Defendants UMG, Sony, Luis Fonsi, Simoes, Andres Torres, and Daddy Yankee.

212. On or about April 2017, UMG released a remix of *Despacito* featuring Justin Bieber (the "*Despacito Remix*"). Upon information and belief, Plaintiffs allege that the *Despacito Remix* was written, recorded, produced, distributed, and/or exploited by Defendants UMG, Sony, Luis Fonsi, Simoes, Daddy Yankee, Bieber, and Boyd.

213. On or about November 17, 2017, UMG released the Luis Fonsi single entitled *Échame La Culpa*. Upon information and belief, Plaintiffs allege that *Échame La Culpa* was written, recorded, produced, distributed, and/or exploited by Defendants UMG, Warner. Sony, Luis Fonsi, El Dandee, Cali, and Torres.

214. On or about October 19, 2018, UMG released the Luis Fonsi single entitled *Imposible*. Upon information and belief, Plaintiffs allege that *Imposible* was

written, recorded, produced, distributed, and/or exploited by Defendants UMG, Sony, Luis Fonsi, El Dandee, Torres, and Ozuna.

215. On or about September 23, 2020, UMG released the Luis Fonsi single entitled *Perfecta*. Upon information and belief, Plaintiffs allege that *Perfecta* was written, recorded, produced, distributed, and/or exploited by Defendants UMG, Warner, Sony, Luis Fonsi, El Dandee, Torres, and Farruko.

216. On or about February 6, 2019, UMG released the Luis Fonsi single entitled *Sola*. Upon information and belief, Plaintiffs allege that Sola was written, recorded, produced, distributed, and/or exploited by Defendants UMG, Warner, Sony, Luis Fonsi, El Dandee, and Torres.

217. On or about February 18, 2021, UMG released the Luis Fonsi single entitled *Vacio*. Upon information and belief, Plaintiffs allege that *Vacio* was written, recorded, produced, distributed, and/or exploited by Defendants UMG, Sony, Luis Fonsi, El Dandee, Torres, and Rauw Alejandro.

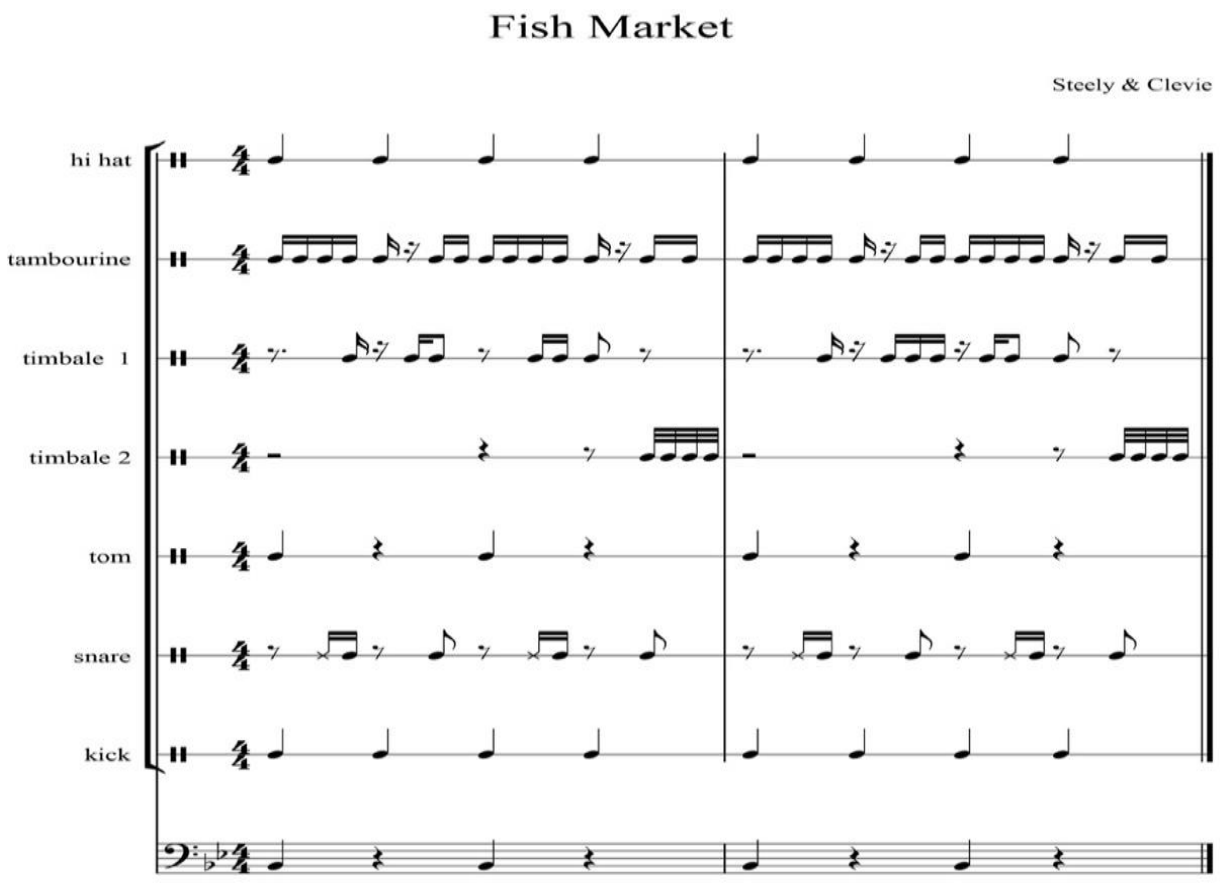
218. *Bésame, Calypso, Date La Vuelta, Despacito, Despacito Remix, Échame La Culpa, Imposible, Perfecta, Sola*, and *Vacio* (collectively, the "Luis Fonsi Works") were each hit songs garnering millions (if not billions) of plays and streams, resulting in significant revenue and profits to the respective Defendants.

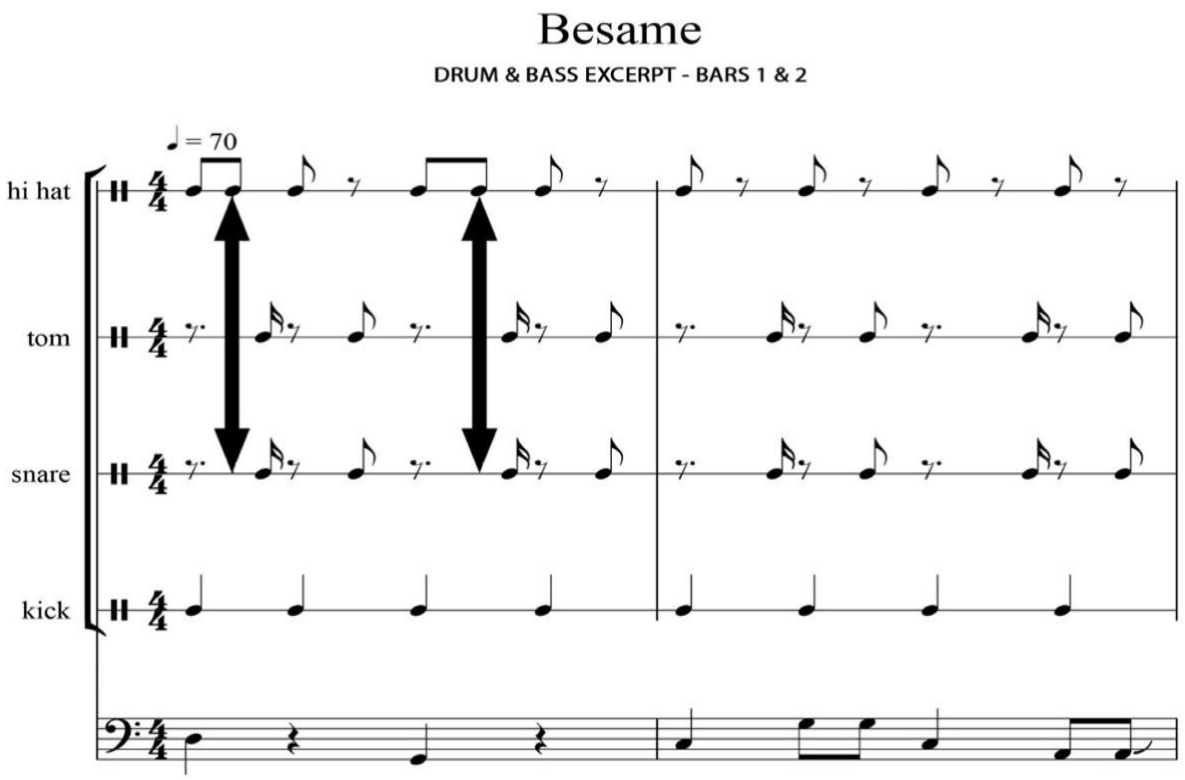
219. Each of the Luis Fonsi Works incorporates an unauthorized sample of the *Fish Market* recording and/or a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

220. A comparison of *Fish Market* and each of the Luis Fonsi Works establishes that each of the Luis Fonsi Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and/or composition.

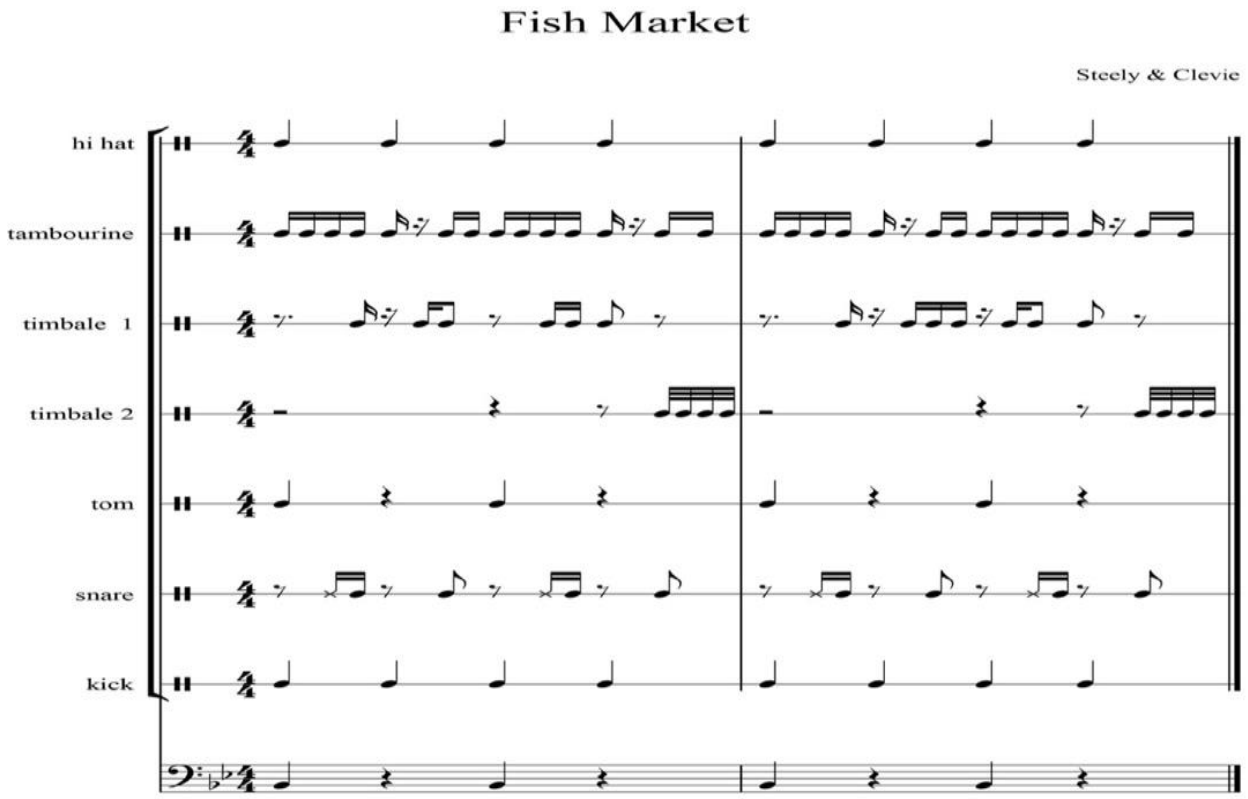
221. The rhythm section of *Bésame* copies original elements of the *Fish Market* rhythm section, including the original combination of drum patterns featured in *Fish Market*—among other things, the kick, snare, and hi-hat patterns and the

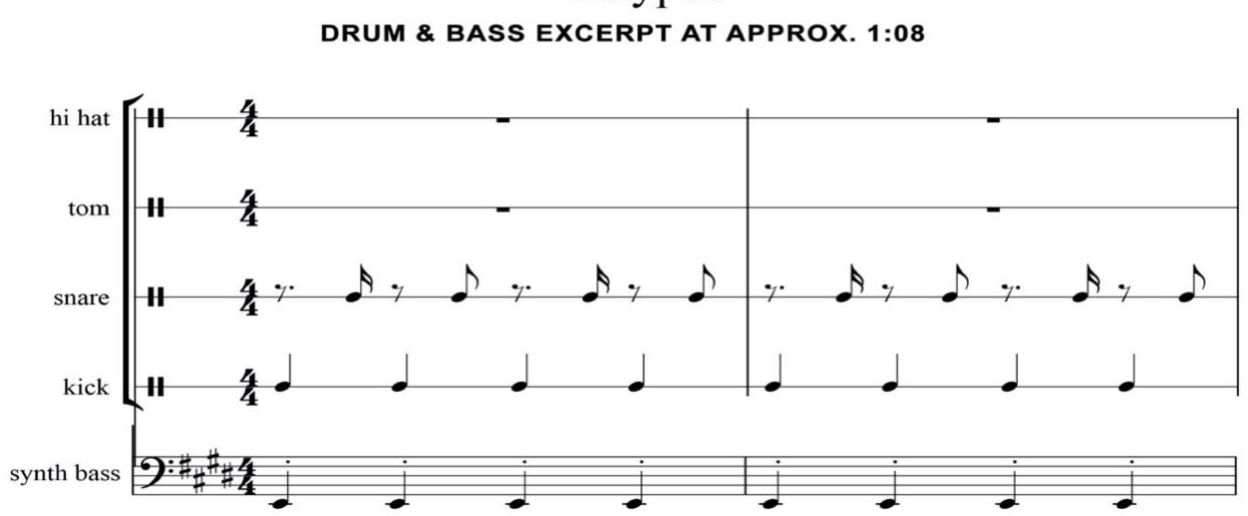
sixteenth notes on the 'and' of beat one (from a hi-hat sound substituted for the corresponding snare in *Fish Market*); the kick drum, which plays four crotchets per bar beginning on the first beat of each bar, as in *Fish Market*; and bongos, which are substituted for the corresponding timbales pattern in *Fish Market*, playing a rapid burst phrase ending the fourth bar. The drum and bass tracks, together and independently, are substantially similar in rhythmic structures and texture to the same tracks in *Fish Market*. The kick, snare, hi-hat, and bass are prominent in the mix of *Bésame*, which emulates the sonic texture of *Fish Market*. And the bassline anchors beats one and three, as in *Fish Market*. Because these copied elements form the backbone of *Bésame*, significant portions of *Bésame* are substantially similar, if not virtually identical, to significant portions of *Fish Market*, as set forth in the transcripts below.





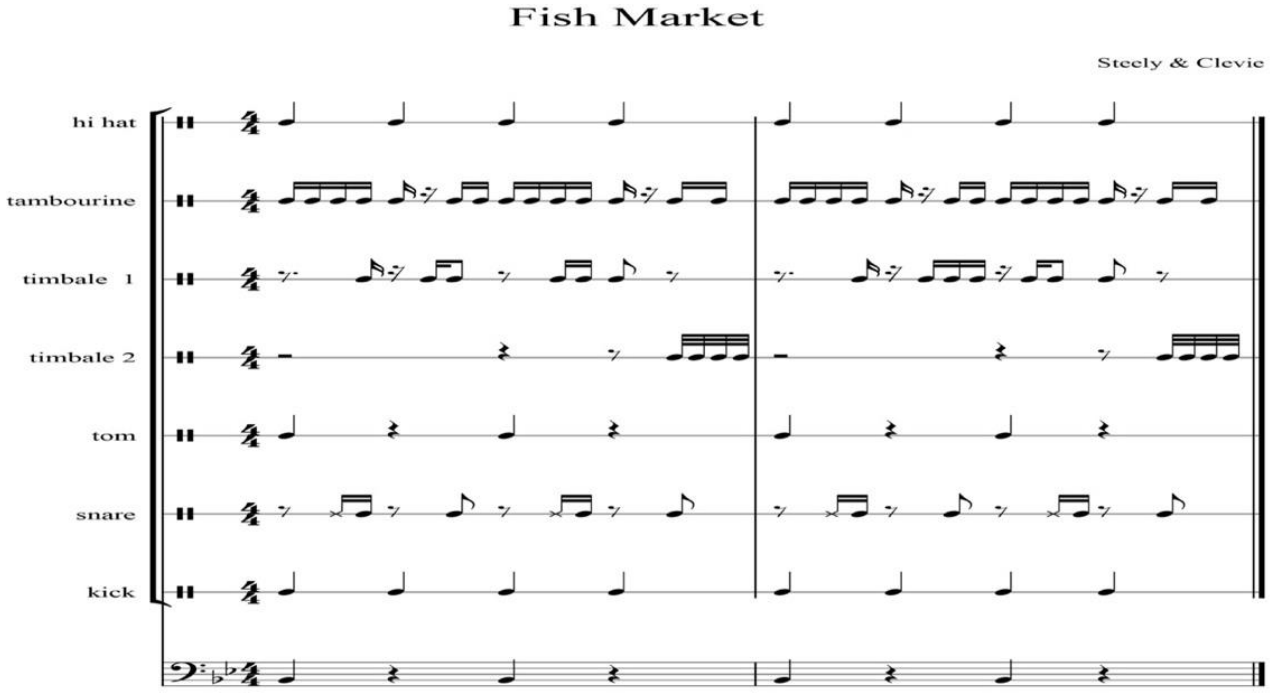
222. The rhythm section of *Calypso* copies original elements of the *Fish Market* rhythm section, including the original combination of drum and bass patterns featured in *Fish Market*. These purloined elements include, without limitation, the kick, snare, and hi-hat patterns, and the sixteenth notes on the 'and' of beat one from a snare sound. The kick, snare, hi-hat and bass are prominent in the mix of *Calypso*, which emulates the sonic texture of *Fish Market*. Because these copied elements form the backbone of *Calypso*, *Calypso* is substantially similar, if not virtually identical, to *Fish Market*, as set forth in the transcripts of portions of each below.

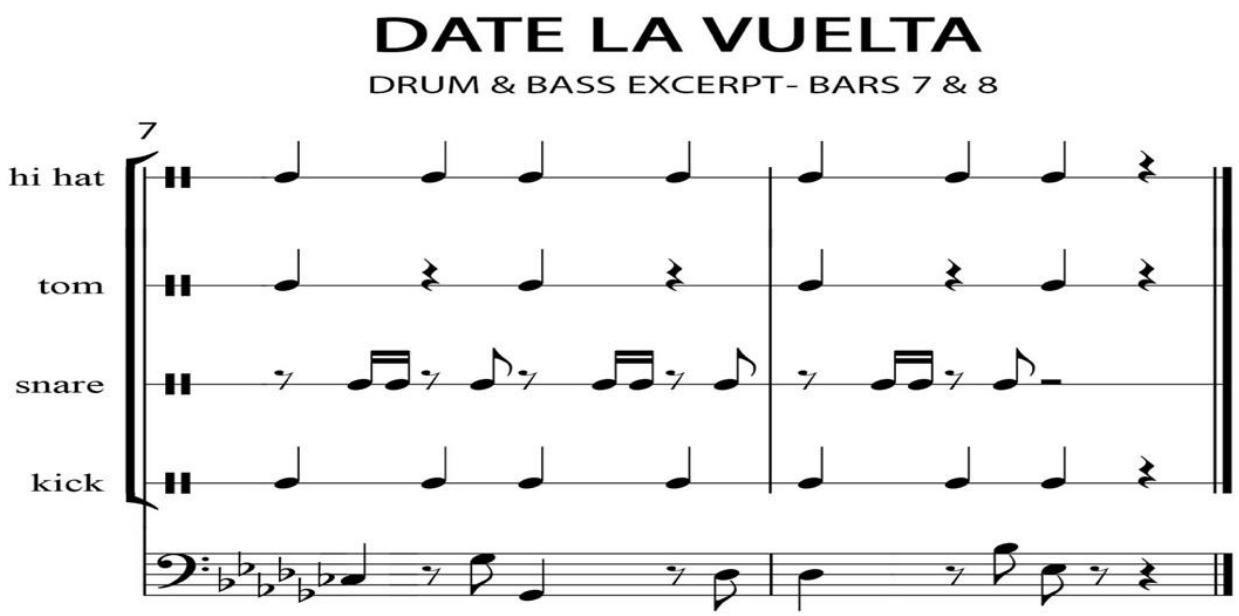




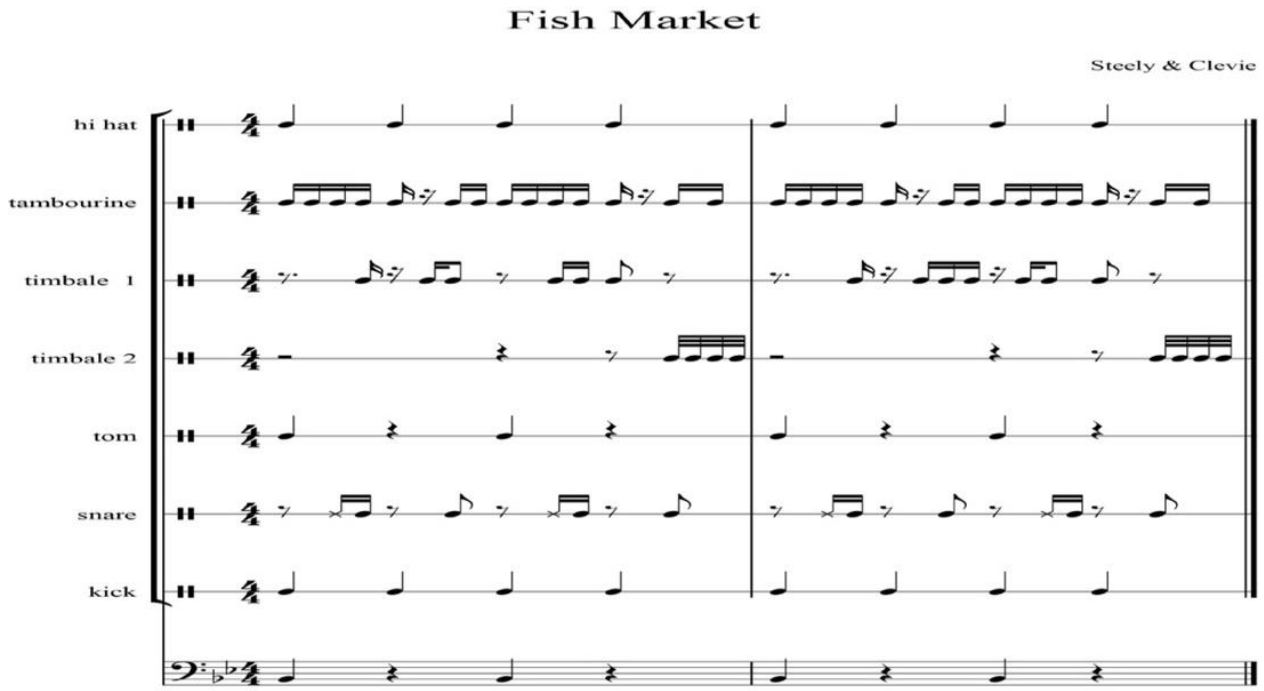
223. The rhythm section of *Date La Vuelta* copies original elements of the *Fish Market* rhythm section, including the original combination of drum and bass patterns featured in *Fish Market*. These purloined elements include, without limitation, the kick, snare, and hi-hat patterns, and the sixteenth notes on the 'and' of beat one from a snare sound. The kick drum of *Date La Vuelta* plays four crotchets

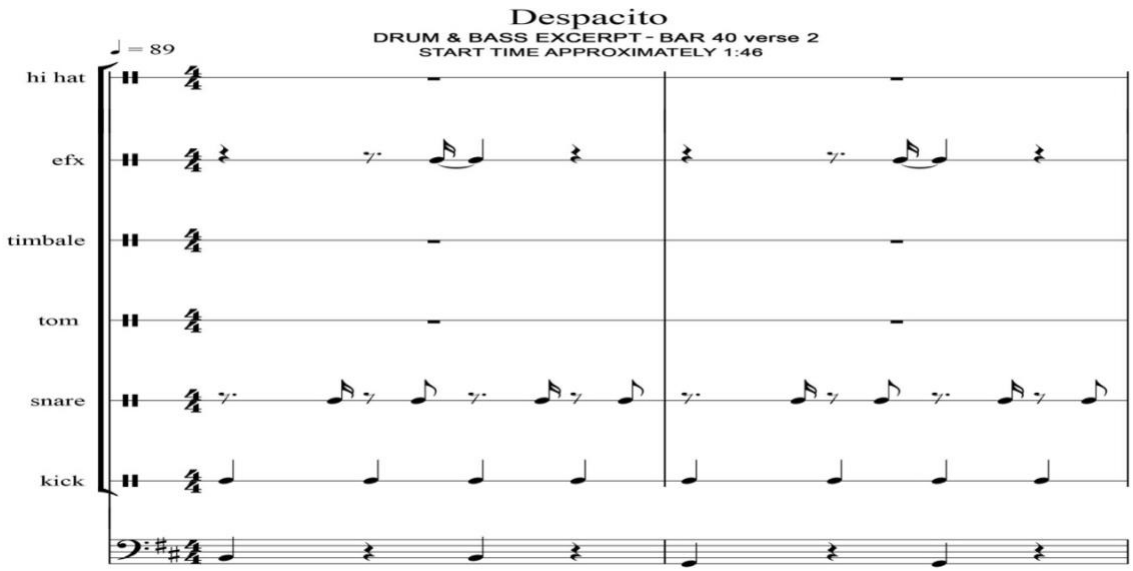
per bar beginning on the first beat of each bar, as in *Fish Market*. The hi-hat plays a similar pattern, as shown on bar 2, 4, 6, and 7 (below). The snare largely mimics the snare pattern as played in *Fish Market*, with a minor variation on alternating bars. The kick, snare, hi-hat, and bass are prominent in the mix of *Date La Vuelta*, which emulates the sonic texture of *Fish Market*. The tom in *Date La Vuelta* plays the exact down beat pattern as *Fish Market*, with emphasis on beats 1 and 3, and shares the unique sonic character of the tom sound found in the *Pounder*, indicating that the tom sound was sampled from the *Pounder*. The drum and bass tracks, together and independently, are substantially similar in rhythmic structures and texture to those of *Fish Market*. And the bassline anchors beats one and three, as in *Fish Market*. Because these copied elements form the backbone of *Date La Vuelta*, *Date La Vuelta* is substantially similar, if not virtually identical, to significant portions of *Fish Market*, as set forth below.





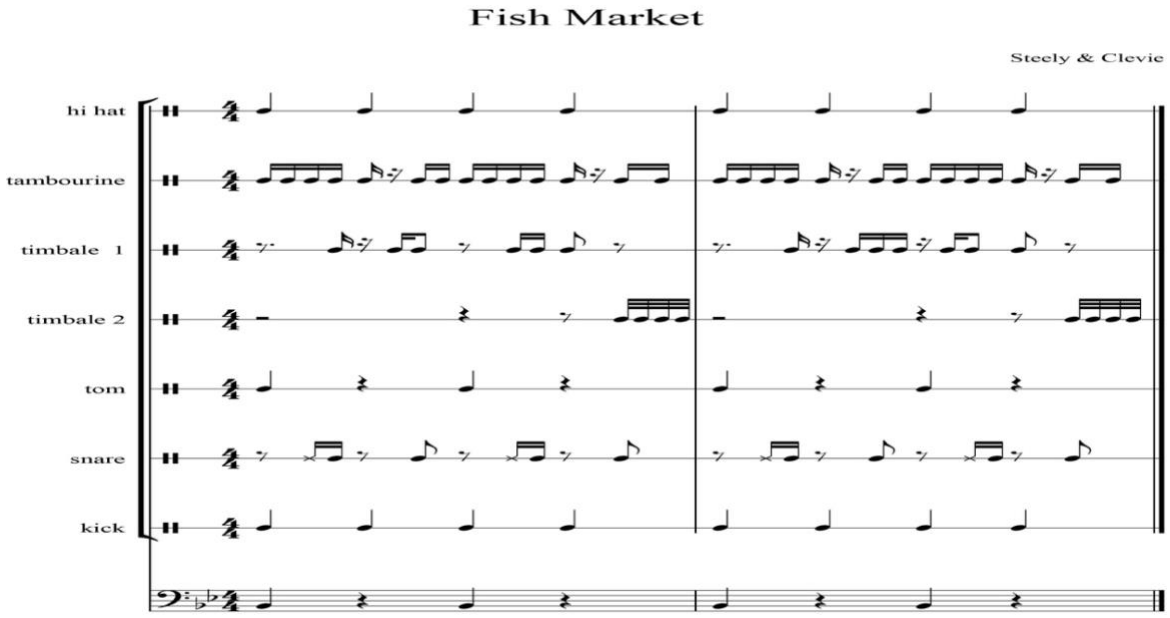
224. The rhythm section of *Despacito* and the *Despacito Remix* copies original elements of the *Fish Market* rhythm section, including the original combination of drum and bass patterns featured in *Fish Market*. These purloined elements include, without limitation, the kick, snare, and bass patterns. The kick drum of *Despacito* plays four crotchets per bar beginning on the first beat of each bar, as in *Fish Market*. The snare mimics the snare pattern played in *Fish Market*. As in *Fish Market*, the bass pattern in *Despacito* is primarily played on beats one and three. In addition, the kick, snare, and bass are prominent in the mix of *Despacito*, as in *Fish Market*. *Despacito* also emulates the texture of *Fish Market*. The drum and bass tracks, together and independently, are substantially similar in rhythmic structures and texture to those of *Fish Market*. The *Despacito Remix* includes the same elements. The musical backbones of *Despacito* and the *Despacito Remix* are substantially similar, if not virtually identical, to *Fish Market*, as set forth below.

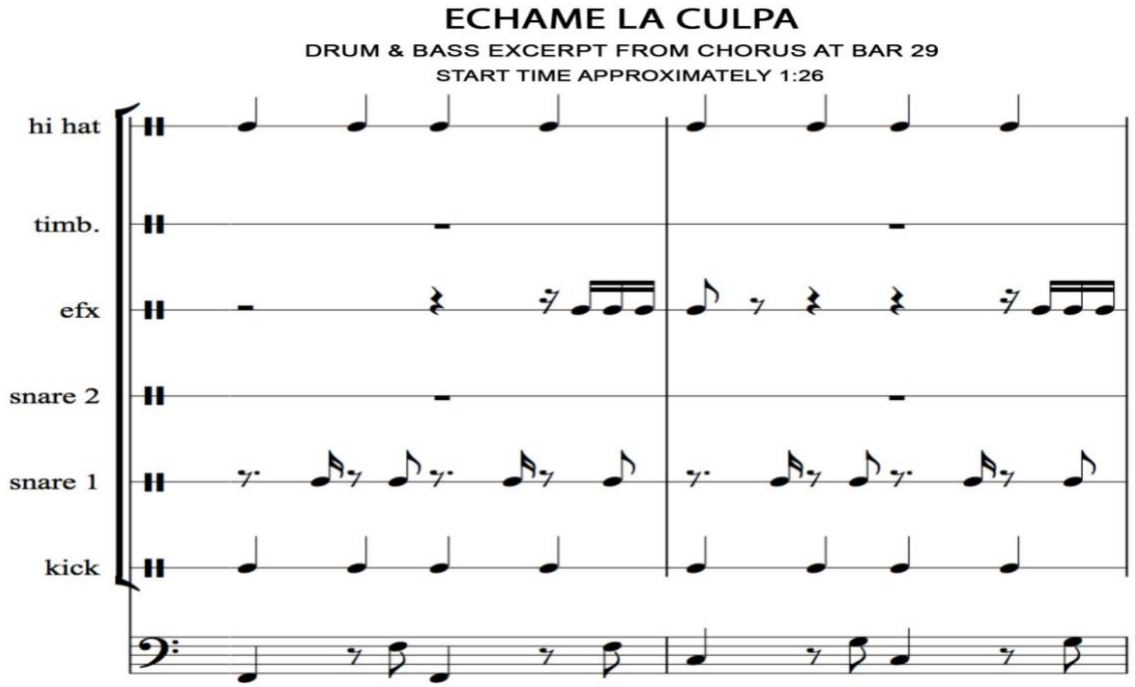




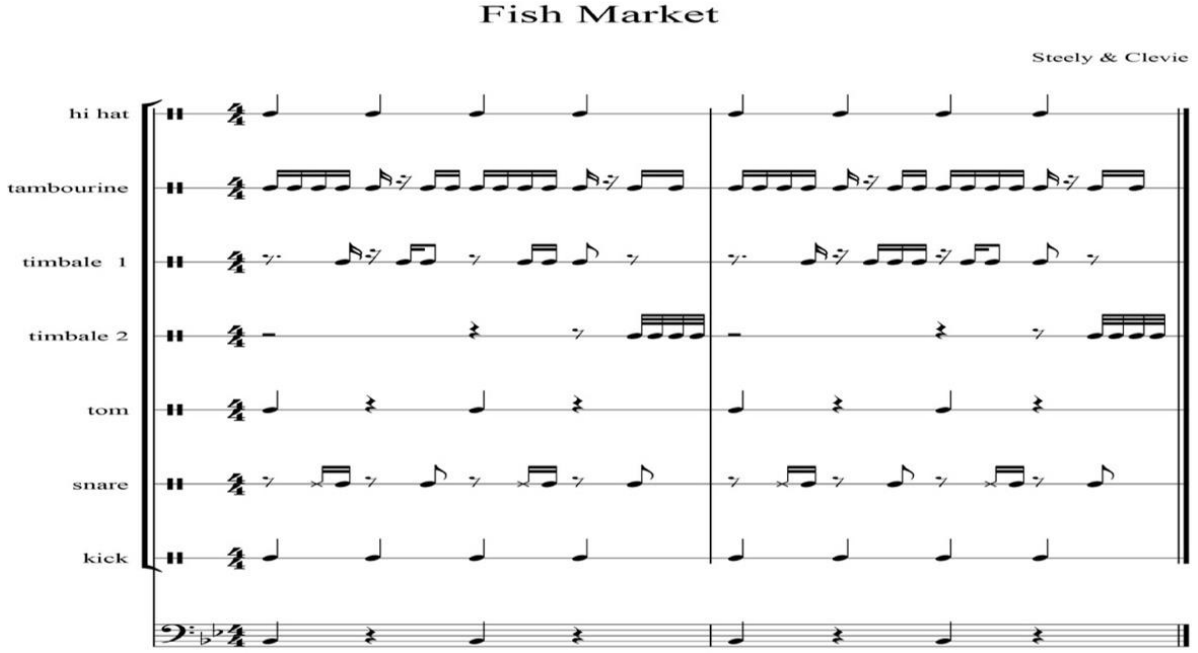
225. The rhythm section of *Échame La Culpa* copies original elements of the *Fish Market* rhythm section, including the original combination of drum and bass patterns featured in *Fish Market*. These copied elements include, without limitation, the kick, snare, and bass patterns. The *Échame La Culpa* bass pattern is predominantly played on beats one and three of every bar, as in *Fish Market*. Both the kick drum and the hi-hat play four crotchets per bar beginning on the first beat of each bar. The snare also mimics the snare in *Fish Market*. The kick, snare, and bass

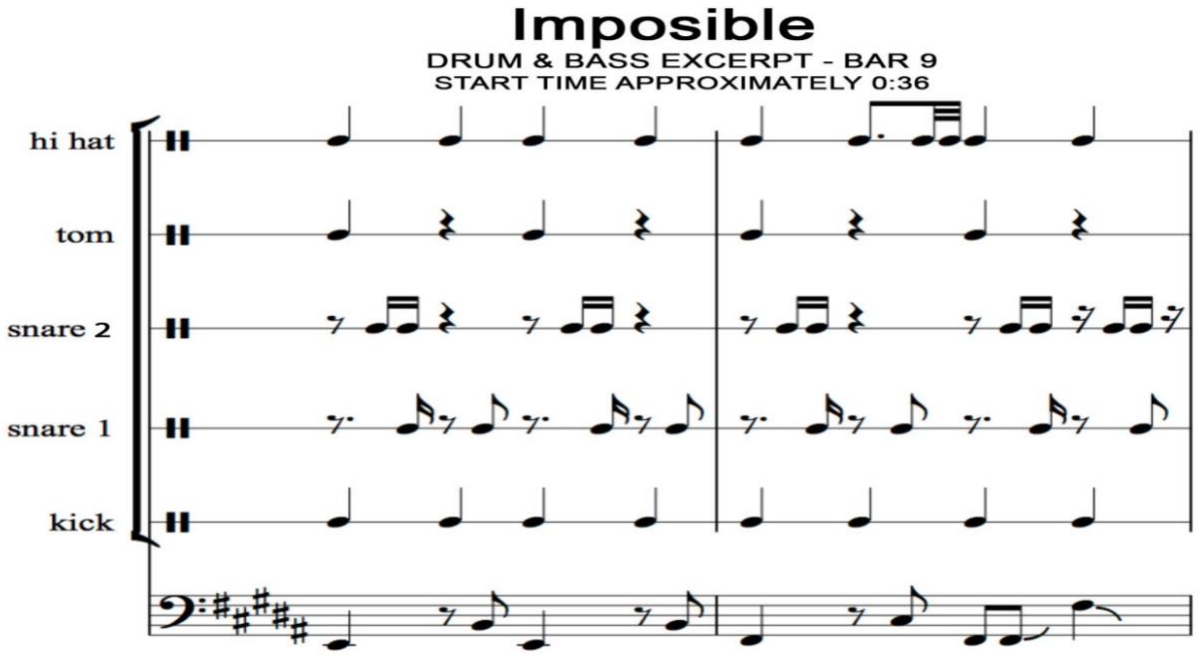
are prominent in the mix of *Échame La Culpa*, as in *Fish Market*. Further, *Échame La Culpa* includes a timbale roll/phrase occurring at the end of every second bar, which mimics the structure of *Fish Market*. In sum, the musical backbone of *Échame La Culpa* is substantially similar, if not virtually identical, to *Fish Market*, as set forth below.



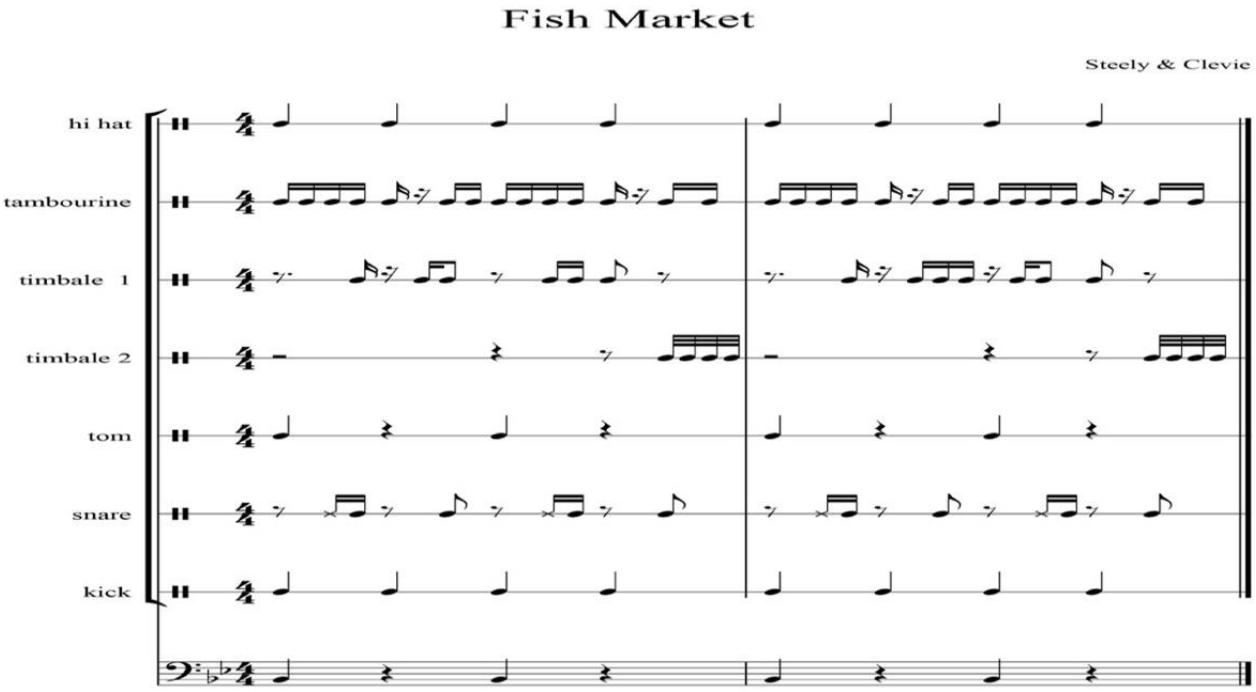


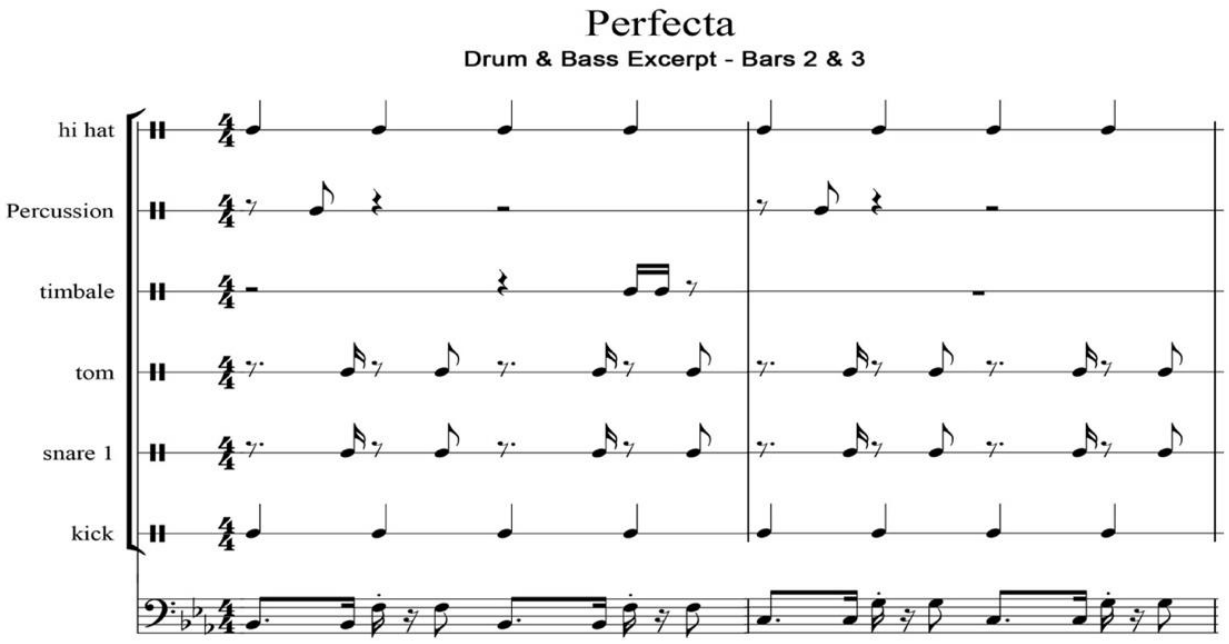
226. *Imposible* copies *Fish Market* by using a sample or interpolation of the *Pounder* as its rhythm section. The bass has a similar texture, and the bassline anchors beats one and three, as in *Fish Market*. The drum and bass tracks combined are substantially similar to the rhythmic structures and texture of the *Fish Market*. Because the *Pounder* sample provides the musical backbone for *Imposible*, *Imposible* is substantially similar, if not virtually identical, to *Fish Market*, as set forth below.



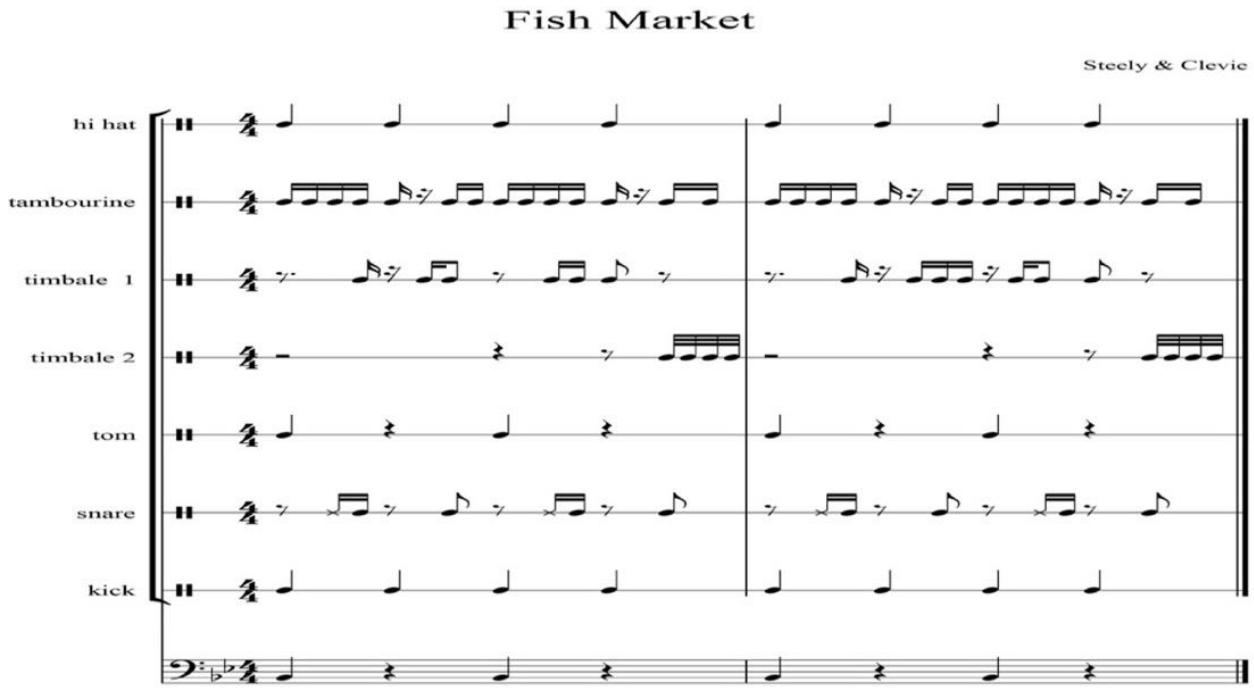


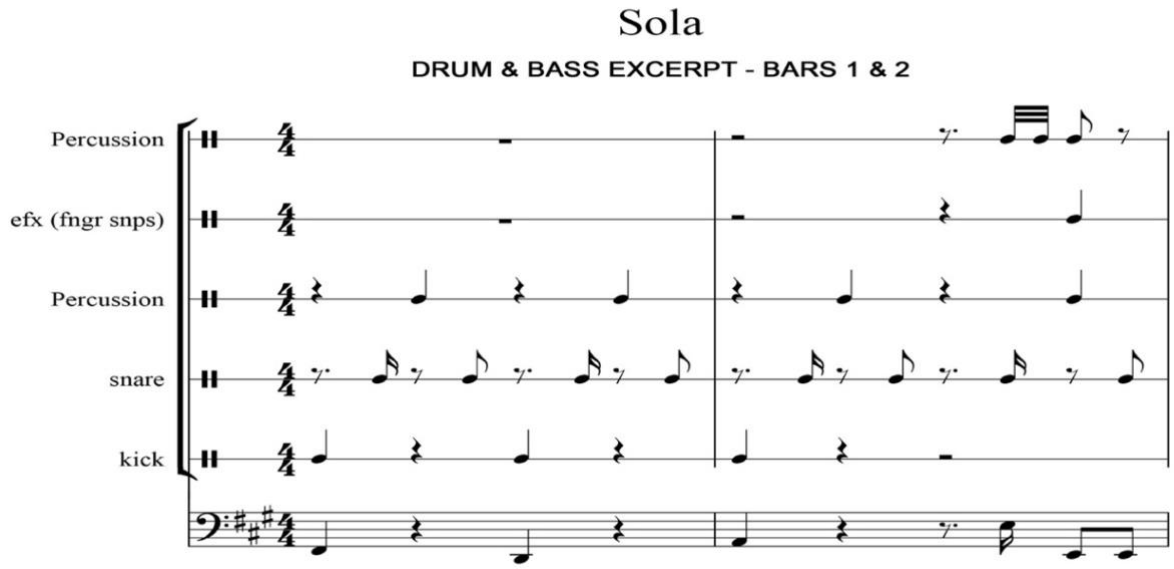
227. The rhythm section of *Perfecta* copies original elements of the *Fish Market* rhythm section, including the original combination of drum and bass patterns featured in *Fish Market*. The kick drum plays four crotchets per bar beginning on the first beat of each bar. The hi-hat plays a similar pattern. The snare mimics the snare pattern in *Fish Market*, with the third sixteenth note filled in or substituted by a percussion or timbale, resulting in the same rhythmic effect as in *Fish Market*. *Perfecta* also copies *Fish Market* by using a sample of the *Pounder* as its rhythm section. Thus, the copied elements of *Fish Market* provide the musical backbone for *Perfecta*, as set forth below.





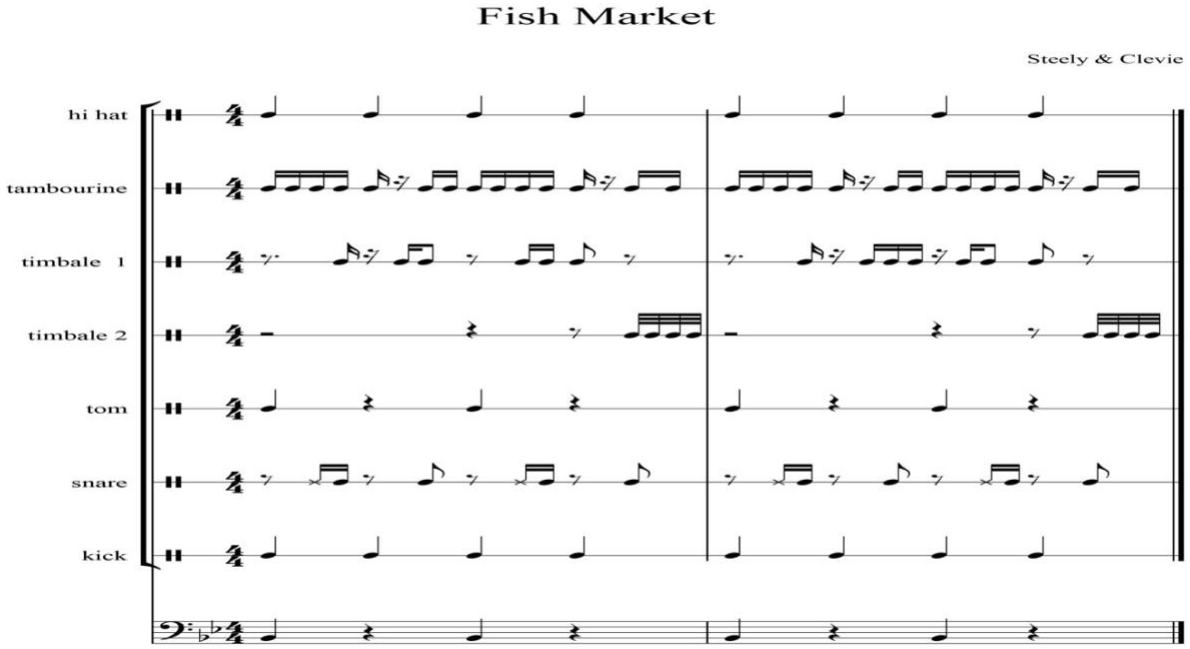
228. The rhythm section of *Sola* copies original elements of the *Fish Market* rhythm section, including the original combination of drum and bass patterns featured in *Fish Market*. These purloined elements include, without limitation, the kick and snare patterns. The kick drum plays two crotchets per bar on beats 1 and 3 of each bar, and beats 2 and 4 are played with a percussive substitute, thus formulating the full kick drum pattern of *Fish Market*. The bass maintains a similar texture with the deep tone timbre found in *Fish Market*. The bassline anchors beats one and three, as in *Fish Market*. And the kick, snare, and bass are prominent in the mix of *Sola*, as in *Fish Market*. Accordingly, the musical backbone of *Sola* is substantially similar, if not virtually identical, to a significant portion of *Fish Market*, as set forth below.

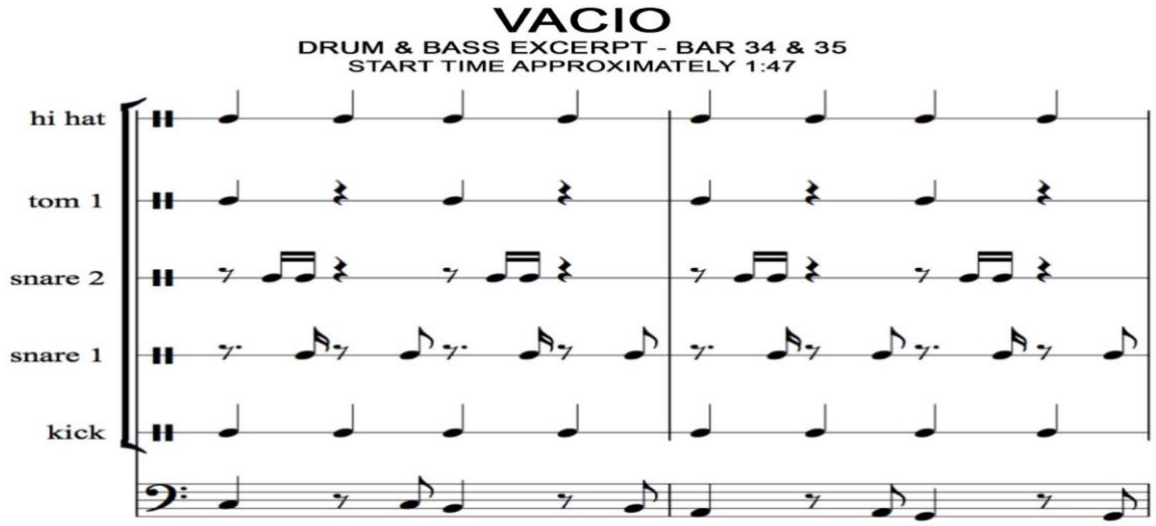




229. The rhythm section of *Vacio* copies original elements of the *Fish Market* rhythm section, including the original combination of drum and bass patterns featured in *Fish Market*. The kick drum and hi-hat play four crotchets per bar beginning on the first beat of each bar, as in *Fish Market*. The snare mimics the snare pattern played in *Fish Market*. Tom 1 (below) is played on beats 1 and 3, as in *Fish Market*. The rhythmic structures and texture of the drum and bass tracks are substantially similar to those of *Fish Market*. And the bassline emphasizes beats 1 and 3, as in *Fish*

Market. *Vacio* also uses a sample of the *Pounder* as its rhythm section. Because the copied elements of *Fish Market* provide the musical backbone for *Vacio*, *Vacio* is substantially similar, if not virtually identical to, significant portions of *Fish Market*, as set forth below.





<u>Daddy Yankee Claims</u>

230. On or about September 12, 1995, the mixtape *Playero 39* by Pedro Gerardo Torruellas Brito p/k/a DJ Playero ("DJ Playero"),[6] which included the Daddy Yankee song *Te Ves Bien*, was released. Upon information and belief, Plaintiffs allege that *Te Ves Bien* was written, recorded, produced, distributed, and/or exploited by Defendants GPC and Daddy Yankee. Copied elements from *Fish Market*, including the original combination of drum and bass patterns featured in *Fish Market* (that, upon information and belief, are audio samples of the *Pounder* and/or *Fish Market*), form the backbone of *Te Ves Bien*. Accordingly, significant portions of *Te Ves Bien* are substantially similar, if not virtually identical, to significant portions of *Fish Market*.

231. On or about March 5, 1996, the mixtape *Playero 40: New Era*, which included the Daddy Yankee song *Camuflash*, was released. Upon information and belief, Plaintiffs allege that *Camuflash* was written, recorded, produced, distributed, and/or exploited by Defendants GPC and Daddy Yankee. Copied elements from *Fish Market*, including the original combination of drum and bass patterns featured in *Fish Market* (that, upon information and belief, are audio samples of the *Pounder* and/or *Fish Market*), form the backbone of *Camuflash*. Accordingly, significant portions of *Camuflash* are substantially similar, if not virtually identical, to significant portions of *Fish Market*.

232. On or about June 20, 2002, El Cartel released the song *Latigazo*. Upon information and belief, Plaintiffs allege that *Latigazo* was written, recorded,

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[6] DJ Playero is credited as one of the originators of reggaeton with the mixtapes Playero 37 from 1993 (which featured reggae dancehall riddims released subsequent to *Poco Man Jam*, such as *Armshouse Riddim* (1993), *Pitch Riddim* (1992), *Make Hay Riddim* (1993), *Bam Bam Riddim* (1992) (on which Defendant Daddy Yankee was recorded), *Big Up Riddim* (1992) and *Hot This Year Riddim* (1992), etc.) and *Playero 38* (also from 1993), on which Daddy Yankee was featured on the song *No Te Canses* (which includes multiple different hip-hop and dancehall samples).

produced, distributed, and/or exploited by Defendants El Cartel, GPC, and Daddy Yankee. Copied elements from *Fish Market*, including the original combination of drum and bass patterns featured in *Fish Market* (that, upon information and belief, are audio samples of the *Pounder* and/or *Fish Market*), form the backbone of *Latigazo*. Accordingly, significant portions of *Latigazo* are substantially similar, if not virtually identical, to significant portions of *Fish Market*.

233. On or about July 13, 2004, El Cartel released the song *Cuéntame*. Upon information and belief, Plaintiffs allege that *Cuéntame* was written, recorded, produced, distributed, and/or exploited by Defendants El Cartel, GPC, Daddy Yankee, Luny, and Tunes. Copied elements from *Fish Market*, including the original combination of drum and bass patterns featured in *Fish Market* (that, upon information and belief, are audio samples of the *Pounder* and/or *Fish Market*), form the backbone of *Cuéntame*. Accordingly, significant portions of *Cuéntame* are substantially similar, if not virtually identical, to significant portions of *Fish Market*.

234. On or about July 13, 2004, El Cartel released the song *Dale Caliente*. Upon information and belief, Plaintiffs allege that *Dale Caliente* was written, recorded, produced, distributed, and/or exploited by Defendants El Cartel, GPC, Daddy Yankee, and DJ Urba. Copied elements from *Fish Market*, including the original combination of drum and bass patterns featured in *Fish Market* (that, upon information and belief, are audio samples of the *Pounder* and/or *Fish Market*), form the backbone of *Dale Caliente*. Accordingly, significant portions of *Dale Caliente* are substantially similar, if not virtually identical, to significant portions of *Fish Market*.

235. On or about July 13, 2004, El Cartel released the song *El Empuje*. Upon information and belief, Plaintiffs allege that *El Empuje* was written, recorded, produced, distributed, and/or exploited by Defendants El Cartel, GPC, Daddy Yankee, and DJ Urba. Copied elements from *Fish Market*, including the original combination of drum and bass patterns featured in *Fish Market* (that, upon

information and belief, are audio samples of the *Pounder* and/or *Fish Market*), form the backbone of *El Empuje*. Accordingly, significant portions of *El Empuje* are substantially similar, if not virtually identical, to significant portions of *Fish Market*.

236. On or about July 13, 2004, El Cartel released the song *Dos Mujeres*. Upon information and belief, Plaintiffs allege that *Dos Mujeres* was written, recorded, produced, distributed, and/or exploited by Defendants El Cartel, GPC, Daddy Yankee, and Luny Tunes. Copied elements from *Fish Market*, including the original combination of drum and bass patterns featured in *Fish Market* (that, upon information and belief, are audio samples of the *Pounder* and/or *Fish Market*), form the backbone of *Dos Mujeres*. Accordingly, significant portions of *Dos Mujeres* are substantially similar, if not virtually identical, to significant portions of *Fish Market*.

237. On or about July 13, 2004, El Cartel released the song *King Daddy*. Upon information and belief, Plaintiffs allege that *King Daddy* was written, recorded, produced, distributed, and/or exploited by Defendants El Cartel, GPC, Daddy Yankee, Luny, and Tunes. Copied elements from *Fish Market*, including the original combination of drum and bass patterns featured in *Fish Market* (that, upon information and belief, are audio samples of the *Pounder* and/or *Fish Market*), form the backbone of *King Daddy*. Accordingly, significant portions of *King Daddy* are substantially similar, if not virtually identical, to significant portions of *Fish Market*.

238. On or about July 13, 2004, El Cartel released the song *No Me Dejes Solo*. Upon information and belief, Plaintiffs allege that *No Me Dejes Solo* was written, recorded, produced, distributed, and/or exploited by Defendants El Cartel, GPC, Daddy Yankee, Wisin, Yandel, and DJ Urba. Copied elements from *Fish Market*, including the original combination of drum and bass patterns featured in *Fish Market* (that, upon information and belief, are audio samples of the *Pounder* and/or *Fish Market*), form the backbone of *No Me Dejes Solo*. Accordingly, significant

portions of *No Me Dejes Solo* are substantially similar, if not virtually identical, to significant portions of *Fish Market*.

239. On or about July 13, 2004, El Cartel released the song *¿Que Vas Hacer?*. Upon information and belief, Plaintiffs allege that *¿Que Vas Hacer?* was written, recorded, produced, distributed, and/or exploited by Defendants El Cartel, GPC, Daddy Yankee and DJ Urba. Copied elements from *Fish Market*, including the original combination of drum and bass patterns featured in *Fish Market* (that, upon information and belief, are audio samples of the *Pounder* and/or *Fish Market*), form the backbone of *¿Que Vas Hacer?*. Accordingly, significant portions of *¿Que Vas Hacer?* are substantially similar, if not virtually identical, to significant portions of *Fish Market*.

240. On or about December 21, 2004, El Cartel released the song *Machete*. Upon information and belief, Plaintiffs allege that *Machete* was written, recorded, produced, distributed, and/or exploited by Defendants El Cartel, GPC, Daddy Yankee, and DJ Urba. Copied elements from *Fish Market*, including the original combination of drum and bass patterns featured in *Fish Market* (that, upon information and belief, are audio samples of the *Pounder* and/or *Fish Market*), form the backbone of *Machete*. Accordingly, significant portions of *Machete* are substantially similar, if not virtually identical, to significant portions of *Fish Market*.

241. On or about September 20, 2005, El Cartel released the song *Rompe*. Upon information and belief, Plaintiffs allege that *Rompe* was written, recorded, produced, distributed, and/or exploited by Defendants El Cartel, GPC, Daddy Yankee, and DJ Urba. Copied elements from *Fish Market*, including the original combination of drum and bass patterns featured in *Fish Market* (that, upon information and belief, are audio samples of the *Pounder* and/or *Fish Market*), form the backbone of *Rompe*. Accordingly, significant portions of *Rompe* are substantially similar, if not virtually identical, to significant portions of *Fish Market*.

242. On or about September 30, 2005, El Cartel released the song *Gangsta Zone*. Upon information and belief, Plaintiffs allege that *Gangsta Zone* was written, recorded, produced, distributed, and/or exploited by Defendants El Cartel, GPC, and Daddy Yankee. Copied elements from *Fish Market*, including the original combination of drum and bass patterns featured in *Fish Market* (that, upon information and belief, are audio samples of the *Pounder* and/or *Fish Market*), form the backbone of *Gangsta Zone*. Accordingly, significant portions of *Gangsta Zone* are substantially similar, if not virtually identical, to significant portions of *Fish Market*.

243. On or about August 30, 2009, El Cartel released the single "*Desafio*", with William Omar Landrón Rivera p/k/a Don Omar ("Don Omar"). Upon information and belief, Plaintiffs allege that *Desafio* was written, recorded, produced, distributed and/or exploited by Defendants El Cartel, GPC, Daddy Yankee, Luny, and Tunes. Copied elements from *Fish Market*, including the original combination of drum and bass patterns featured in *Fish Market* (that, upon information and belief, are audio samples of the *Pounder* and/or *Fish Market*), form the backbone of *Desafio* and accordingly, significant portions of *Desafio* are substantially similar if not virtually identical to significant portions of *Fish Market*.

244. On or about July 6, 2011, El Cartel released the single "*Llegamos a la Disco*". Upon information and belief, Plaintiffs allege that *Llegamos a la Disco* was written, recorded, produced, distributed and/or exploited by Defendants El Cartel, GPC, and Daddy Yankee. Copied elements from *Fish Market*, including the original combination of drum and bass patterns featured in *Fish Market* (that, upon information and belief, are audio samples of the *Pounder* and/or *Fish Market*), form the backbone of *Llegamos a la Disco* and accordingly, significant portions of *Llegamos a la Disco* are substantially similar if not virtually identical to significant portions of *Fish Market*.

245. On or about January 28, 2012, El Cartel released the single "*Guaya*". Upon information and belief, Plaintiffs allege that *Guaya* was written, recorded, produced, distributed and/or exploited by Defendants El Cartel, GPC, and Daddy Yankee. Copied elements from *Fish Market*, including the original combination of drum and bass patterns featured in *Fish Market* (that, upon information and belief, are audio samples of the *Pounder* and/or *Fish Market*), form the backbone of *Guaya* and accordingly, significant portions of *Guaya* are substantially similar if not virtually identical to significant portions of *Fish Market*.

246. On or about September 11, 2012, El Cartel released the single "*Perros Salvajes*". Upon information and belief, Plaintiffs allege that *Perros Salvajes* was written, recorded, produced, distributed and/or exploited by Defendants El Cartel, GPC, and Daddy Yankee. Copied elements from *Fish Market*, including the original combination of drum and bass patterns featured in *Fish Market* (that, upon information and belief, are audio samples of the *Pounder* and/or *Fish Market*), form the backbone of *Perros Salvajes* and accordingly, significant portions of *Perros Salvajes* are substantially similar if not virtually identical to significant portions of *Fish Market*.

247. On or about October 15, 2012, El Cartel released the single "*After Party*". Upon information and belief, Plaintiffs allege that *After Party* was written, recorded, produced, distributed and/or exploited by Defendants El Cartel, GPC, and Daddy Yankee. Copied elements from *Fish Market*, including the original combination of drum and bass patterns featured in *Fish Market* (that, upon information and belief, are audio samples of the *Pounder* and/or *Fish Market*), form the backbone of *After Party* and accordingly, significant portions of *After Party* are substantially similar if not virtually identical to significant portions of *Fish Market*.

248. On or about October 29, 2013, El Cartel released the single "*La Rompe Carros*". Upon information and belief, Plaintiffs allege that *La Rompe Carros* was

written, recorded, produced, distributed and/or exploited by Defendants El Cartel, GPC, Daddy Yankee, Luny, and Tunes. Copied elements from *Fish Market*, including the original combination of drum and bass patterns featured in *Fish Market* (that appear to be at least partially provided by an audio sample of the *Pounder*), form the backbone of *La Rompe Carros* and accordingly, significant portions of *La Rompe Carros* are substantially similar if not virtually identical to significant portions of *Fish Market*.

249. On or about September 7, 2012, El Cartel released the single "*Po' Encima*". Upon information and belief, Plaintiffs allege that *Po' Encima* was written, recorded, produced, distributed and/or exploited by Defendants El Cartel, GPC, and Daddy Yankee. Copied elements from *Fish Market* (that, upon information and belief, are audio samples of the *Pounder* and/or *Fish Market*) form the backbone of *Po' Encima* and accordingly, significant portions of *Po' Encima* are substantially similar if not virtually identical to significant portions of *Fish Market*.

250. On or about September 7, 2012, El Cartel released the single "*Quiero Decirte*". Upon information and belief, Plaintiffs allege that *Quiero Decirte* was written, recorded, produced, distributed and/or exploited by Defendants El Cartel, GPC, and Daddy Yankee. Copied elements from *Fish Market* (that, upon information and belief, are audio samples of the *Pounder* and/or *Fish Market*) form the backbone of *Quiero Decirte* and accordingly, significant portions of *Quiero Decirte* are substantially similar if not virtually identical to significant portions of *Fish Market*.

251. On or about October 13, 2013, El Cartel released the single "*Nada Ha Cambiado*". Upon information and belief, Plaintiffs allege that *Nada Ha Cambiado* was written, recorded, produced, distributed and/or exploited by Defendants El Cartel, GPC, and Daddy Yankee. Copied elements from *Fish Market* (that, upon information and belief, are audio samples of the *Pounder* and/or *Fish Market*) form the backbone of *Nada Ha Cambiado* and accordingly, significant portions of *Nada*

Ha Cambiado are substantially similar if not virtually identical to significant portions of *Fish Market*.

252. On or about February 3, 2016, El Cartel released the single "*Alerta Roja*". Upon information and belief, Plaintiffs allege that *Alerta Roja* was written, recorded, produced, distributed and/or exploited by Defendants El Cartel, GPC, Daddy Yankee, Chris Jeday, and Gaby Music. Copied elements from *Fish Market*, including the original combination of drum and bass patterns featured in *Fish Market* (that, upon information and belief, are audio samples of the *Pounder* and/or *Fish Market*), form the backbone of *Alerta Roja* and accordingly, significant portions of *Alerta Roja* are substantially similar if not virtually identical to significant portions of *Fish Market*.

253. *After Party*, *Alerta Roja*, *Camuflash*, *Cuéntame*, *Dale Caliente*, *Desafio*, *Dos Mujeres*, *El Empuje*, *Gangsta Zone*, *Guaya*, *King Daddy*, *La Rompe Carros*, *Latigazo*, *Llegamos a la Disco*, *Machete*, *Nada Ha Cambiado*, *No Me Dejes Solo*, *Perros Salvajes*, *Po' Encima*, *¿Que Vas Hacer?*, *Quiero Decirte*, *Rompe*, and *Te Ves Bien* all copied elements from *Fish Market* (that, upon information and belief, are audio samples of the *Pounder* and/or *Fish Market*). Each of these identified Infringing Works were each hit songs, garnering at least millions of plays and streams and resulting in significant revenue and profits to the respective Defendants.

254. On or about November 8, 2018, UMG and El Cartel released the single *"Adictiva"*. Upon information and belief, Plaintiffs allege that *Adictiva* was written, recorded, produced, distributed and/or exploited by Defendants UMG, UMP, El Cartel, Warner, Kobalt, GPC, Daddy Yankee, Chris Jeday, Gaby Music, and Anuel AA.

255. On or about January 24, 2019, UMG and El Cartel released the single *"Con Calma"*. Upon information and belief, Plaintiffs allege that *Con Calma* was

written, recorded, produced, distributed and/or exploited by Defendants UMG, El Cartel, GPC, Warner, Daddy Yankee, Play, and Skillz.

256. On or about January 31, 2020, UMG and El Cartel released the single *"Definitivamente"*. Upon information and belief, Plaintiffs allege that *Definitivamente* was written, recorded, produced, distributed and/or exploited by Defendants UMG, UMP, El Cartel, GPC, SONY, Daddy Yankee, Sech, and Luny.

257. On or about September 11, 2020, UMG and El Cartel released the single *"Don Don"*. Upon information and belief, Plaintiffs allege that *Don Don* was written, recorded, produced, distributed and/or exploited by Defendants UMG, UMP, Warner, El Cartel, GPC, Sony, Daddy Yankee, and Anuel AA.

258. On or about January 18, 2018, UMG and El Cartel released the single *"Dura"*. Upon information and belief, Plaintiffs allege that *Dura* was written, recorded, produced, distributed and/or exploited by Defendants UMG, Kobalt, El Cartel, GPC, Daddy Yankee, Warner, DJ Urba, and Gaby Music.

259. On or about April 23, 2021, UMG and El Cartel released the single *"El Pony"*. Upon information and belief, Plaintiffs allege that *El Pony* was written, recorded, produced, distributed and/or exploited by Defendants El Cartel, GPC, Daddy Yankee, UMG, Warner, Chris Jeday, and Gaby Music.

260. On or about November 1, 2004, El Cartel released the single *"Gasolina"*. Upon information and belief, Plaintiffs allege that *Gasolina* was written, recorded, produced, distributed and/or exploited by Defendants El Cartel, GPC, Daddy Yankee, UMG, SONY, Luny, and Tunes.

261. On or about March 3, 2017, El Cartel released the single *"Hula Hoop"*. Upon information and belief, Plaintiffs allege that *Hula Hoop* was written, recorded, produced, distributed and/or exploited by Defendants El Cartel, GPC, Daddy Yankee, UMG, Kobalt, Sony, SONY, and DJ Urba.

262. On or about January 6, 2017, Sony and El Cartel released the single *"La Rompe Corazones"*. Upon information and belief, Plaintiffs allege that *La Rompe Corazones* was written, recorded, produced, distributed and/or exploited by Defendants El Cartel, GPC, Daddy Yankee, UMG, SONY, Warner, Ozuna, Chris Jeday, and Gaby Music.

263. On or about May 16, 2004, Sony and El Cartel released the single *"Lo Que Pasó, Pasó"*. Upon information and belief, Plaintiffs allege that *Lo Que Pasó, Pasó* was written, recorded, produced, distributed and/or exploited by Defendants El Cartel, GPC, Daddy Yankee, UMG, Sony, SONY, Luny, and Tunes.

264. On or about September 21, 2021, Sony and El Cartel released the single *"Mételе Al Perreo"*. Upon information and belief, Plaintiffs allege that *Mételе Al Perreo* was written, recorded, produced, distributed and/or exploited by Defendants El Cartel, GPC, Daddy Yankee, UMG, SONY, Luny, and Tunes.

265. On or about January 8, 2020, Sony and Epic released the single *"Muévelo"*. Upon information and belief, Plaintiffs allege that *Muévelo* was written, recorded, produced, distributed and/or exploited by Defendants El Cartel, GPC, Daddy Yankee, UMG, Warner, Sony, Kobalt, Nicky Jam, Play-n-Skillz, and SONY.

266. On or about February 25, 2021, Sony and El Cartel released the single *"Problema"*. Upon information and belief, Plaintiffs allege that *Problema* was written, recorded, produced, distributed and/or exploited by Defendants El Cartel, GPC, Daddy Yankee, UMG, UMP, SONY, and Sony.

267. On or about October 18, 2019, Sony and El Cartel released the single *"Que Tire Pa' 'Lante"*. Upon information and belief, Plaintiffs allege that *Que Tire Pa' 'Lante* was written, recorded, produced, distributed and/or exploited by Defendants El Cartel, GPC, Daddy Yankee, UMG, SONY, Warner, Kobalt, and DJ Urba.

268. On or about December 11, 2015, UMG and El Cartel released the single *"Shaky Shaky"*. Upon information and belief, Plaintiffs allege that *Shaky Shaky* was written, recorded, produced, distributed and/or exploited by Defendants El Cartel, GPC, SONY, Daddy Yankee, UMG, Sony, Kobalt, Gaby Music, and DJ Urba.

269. On or about June 28, 2019, El Cartel released the single *"Si Supieras"*. Upon information and belief, Plaintiffs allege that *Si Supieras* was written, recorded, produced, distributed and/or exploited by Defendants El Cartel, GPC, Daddy Yankee, UMG, Warner, Sony, Tainy, Luny, SONY, Wisin, and Yandel.

270. On or about March 12, 2015, UMG and El Cartel released the single "*Sígueme y Te Sigo"*. Upon information and belief, Plaintiffs allege that *Sígueme y Te Sigo* was written, recorded, produced, distributed and/or exploited by Defendants El Cartel, GPC, Daddy Yankee, UMG, SONY, Sony, Warner, Chris Jeday, and Gaby Music.

271. On or about June 15, 2018, Sony Music and Pina Records released the single *"Zum Zum"*. Upon information and belief, Plaintiffs allege that *Zum Zum* was written, recorded, produced, distributed and/or exploited by Defendants El Cartel, GPC, Daddy Yankee, UMG, Warner, Sony, Kobalt, Luny, and Tunes.

272. *Adictiva*, *Con Calma*, *Definitivamente*, *Don Don*, *Dura*, *El Pony*, *Gasolina*, *Hula Hoop*, *La Rompe Corazones*, *Lo Que Pasó*, *Pasó*, *Mételе Al Perreo*, *Muévelo*, *Problema*, *Que Tire Pa' 'Lante*, *Shaky Shaky*, *Si Supieras*, *Sígueme y Te Sigo*, and *Zum Zum* were each hit songs garnering at least millions of plays and streams and resulting in significant revenue and profits to the respective Defendants.

273. On or about July 13, 2004, UMG and El Cartel released the single "*Golpe de Estado*". Upon information and belief, Plaintiffs allege that *Golpe de Estado* was written, recorded, produced, distributed and/or exploited by Defendants El Cartel, GPC, Daddy Yankee, UMG, Yandel, Luny, and Tunes. *Golpe de Estado* includes elements that are substantially similar if not virtually identical to significant

portions of *Dem Bow*, including the lyrical portions of *Dem Bow*. Additionally, copied elements from *Fish Market* (that appear to be at least partially provided by an audio sample of the *Pounder*) form the backbone of *Golpe de Estado* and accordingly, significant portions of *Golpe de Estado* are substantially similar if not virtually identical to significant portions of *Fish Market*.

274. On or about October 29, 2013, El Cartel released the single "*Calenton*". Upon information and belief, Plaintiffs allege that *Calenton* was written, recorded, produced, distributed and/or exploited by Defendants El Cartel, GPC, Daddy Yankee, and Yandel. *Calenton* includes elements that are substantially similar if not virtually identical to significant portions of *Dem Bow*, including the lyrical portions of *Dem Bow*. Additionally, copied elements from *Fish Market* (that appear to be at least partially provided by an audio sample of the *Pounder*) form the backbone of *Calenton* and accordingly, significant portions of *Calenton* are substantially similar if not virtually identical to significant portions of *Fish Market*.

275. *Golpe de Estado*, and *Calenton* each contain substantially similar if not virtually identical portions of *Dem Bow*, including the lyrical portions of *Dem Bow*. *Golpe de Estado*, and *Calenton* were each hit songs garnering at least millions of plays and streams around the world resulting in significant revenue and profits to the respective Defendants.

276. *Adictiva*, *Con Calma*, *Definitivamente*, *Don Don*, *Dura*, *El Pony*, *Gasolina*, *Hula Hoop*, *La Rompe Corazones*, *Lo Que Pasó*, *Pasó*, *Mételе Al Perreo*, *Muévelo*, *Problema*, *Que Tire Pa' 'Lante*, *Shaky Shaky*, *Si Supieras*, *Sígueme y Te Sigo*, *Zum Zum*, *After Party*, *Alerta Roja*, *Camuflash*, *Cuéntame*, *Dale Caliente*, *Desafio*, *Dos Mujeres*, *El Empuje*, *Gangsta Zone*, *Guaya*, *King Daddy*, *La Rompe Carros*, *Latigazo*, *Llegamos a la Disco*, *Machete*, *Nada Ha Cambiado*, *No Me Dejes Solo*, *Perros Salvajes*, *Po' Encima*, *¿Que Vas Hacer?*, *Quiero Decirte*, *Rompe*, *Te Ves Bien*, *Golpe de Estado*, and *Calenton* (collectively the "Daddy Yankee Works")

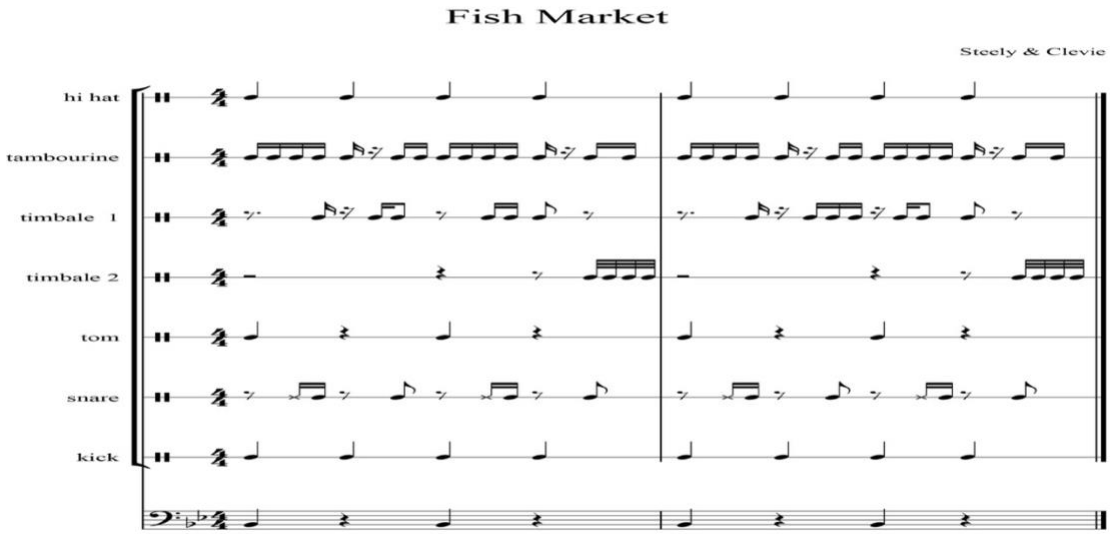
incorporates an unauthorized sample of the *Fish Market* recording and/or a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of the Daddy Yankee Work. The Daddy Yankee Works and the parties responsible are also depicted in Exhibit A attached hereto.

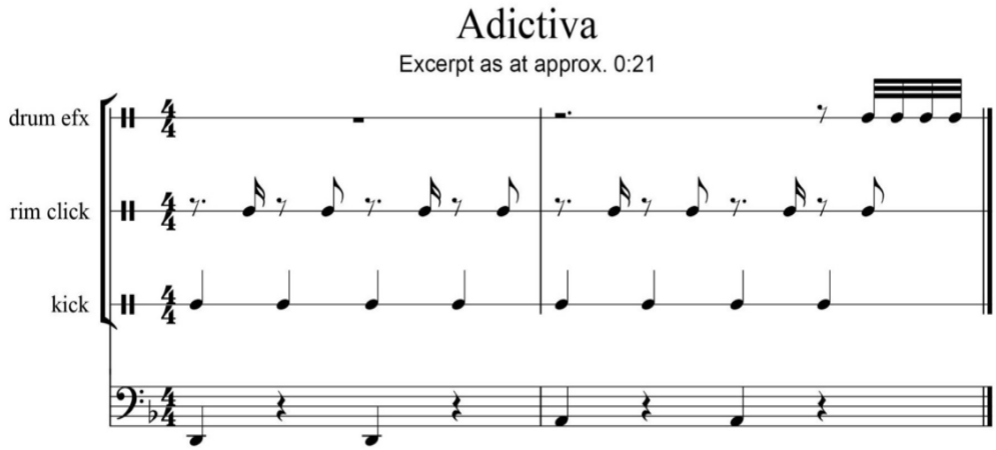
277. A comparison of *Fish Market* and each of the Daddy Yankee Works establishes that each of the Daddy Yankee Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and/or composition.

278. Specific analysis of *Adictiva*, *Con Calma*, *Definitivamente*, *Don Don*, *Dura*, *El Pony*, *Gasolina*, *Hula Hoop*, *La Rompe Corazones*, *Lo Que Pasó*, *Pasó*, *Mételе Al Perreo*, *Muévelo*, *Problema*, *Que Tire Pa' 'Lante*, *Shaky Shaky*, *Si Supieras*, *Sígueme y Te Sigo*, and *Zum Zum* illustrates the substantial similarity between the *Fish Market* and the identified Daddy Yankee Works.

279. The rhythm section of *Adictiva* copies original elements of the *Fish Market* rhythm section, including the original combination of drum patterns featured in *Fish Market*. These purloined elements include, without limitation, the kick, and snare patterns of *Fish Market*. The kick drum of *Adictiva* plays four crotchets per bar beginning on the first beat of each bar as in *Fish Market*. The rim/snare pattern also replicates that of *Fish Market*. *Adictiva* features a percussive 32nd beats pulse at the end of the second bar. This serves to replicate the 32nd timbale roll played at the end of the second bar in *Fish Market*. The drum and bass tracks both together and independently, are substantially similar in rhythmic structures and texture to those of *Fish Market*. The kick, snare, hi-hat and bass in *Adictiva* are at least substantially similar to those elements in *Fish Market*. Further, despite note deviations to match the song's chord structure, the bassline most commonly anchors on beats one and three as in *Fish Market*. The bass line also copies the tone and minimalist structure of that played in *Fish Market*. These copied elements form the backbone of *Adictiva* and accordingly, significant portions of *Adictiva* are substantially similar if not virtually

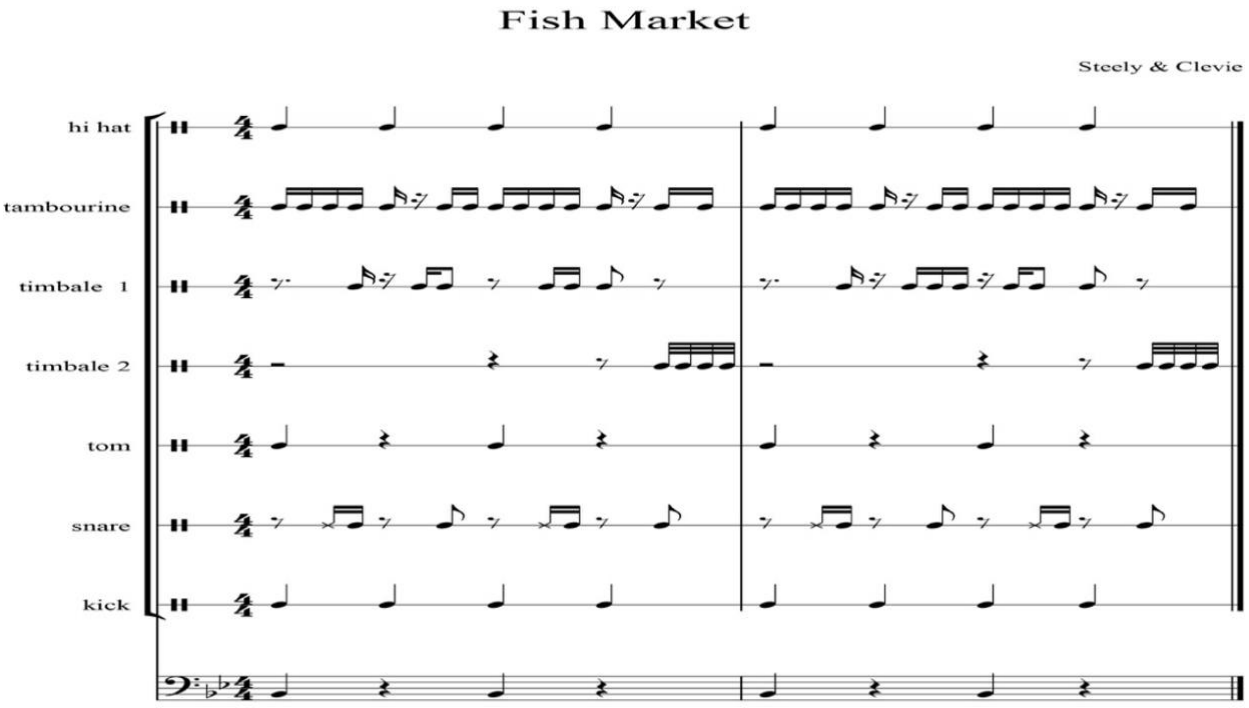
identical to significant portions of *Fish Market*, as shown by comparison of the transcripts of portions of each below.

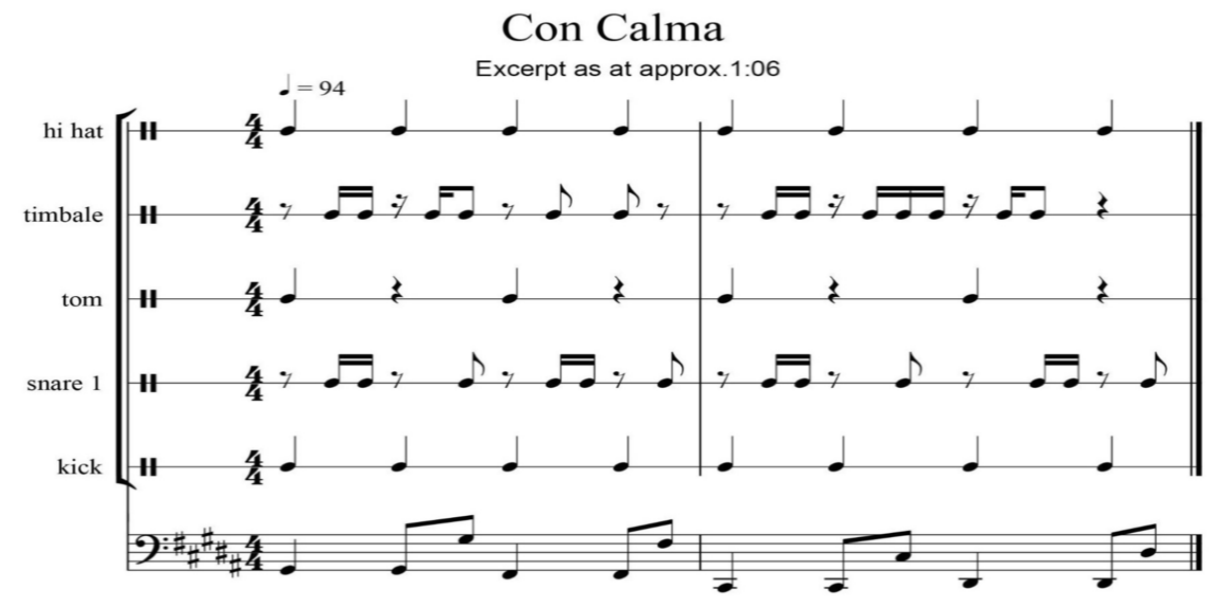




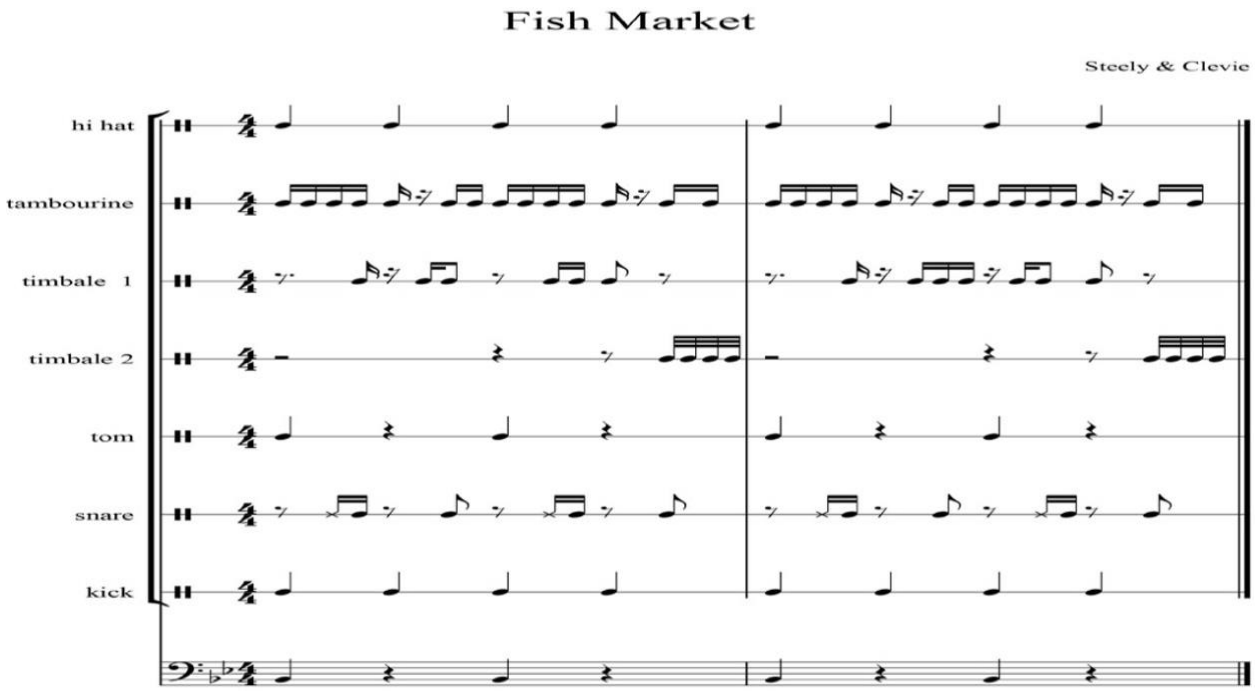
280. The rhythm section of *Con Calma* copies original elements of the *Fish Market* rhythm section, including the original combination of drum patterns featured in *Fish Market*. These purloined elements include, without limitation, the kick, snare and hi-hat patterns of *Fish Market*. The kick drum of *Con Calma* plays four crotchets per bar beginning on the first beat of each bar as in *Fish Market*. The rim/snare pattern also replicates that of *Fish Market*. The hi-hat copies the pattern as played on beats one, two, three and four of each bar in *Fish Market*. The timbale of *Con Calma*

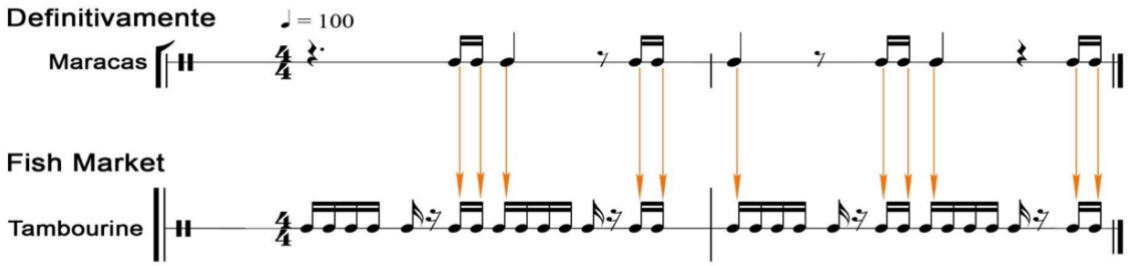
replicates the portions of the *Fish Market* pattern and sonic characteristics found in the *Pounder* and could be an audio sample taken from the same. The tom copies the Fish Market tom pattern which is played on the down beats one and three. The drum and bass tracks both together and independently, are substantially similar in rhythmic structures and texture to those of *Fish Market*. Further, despite note deviations to match the song's chord structure, the bassline most commonly anchors on beats one and three as in *Fish Market*. The bass line also copies the tone and minimalist structure of that played in *Fish Market*. These copied elements form the backbone of *Con Calma* and accordingly, significant portions of *Con Calma* are substantially similar if not virtually identical to significant portions of *Fish Market*, as shown in the transcripts of portions of each below.

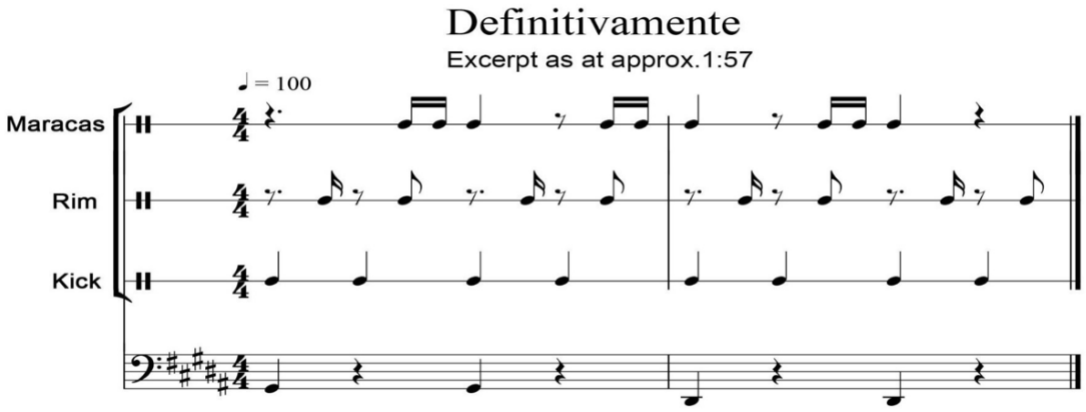




281. The rhythm section of *Definitivamente* copies original elements of the *Fish Market* rhythm section, including the original combination of drum and bass patterns featured in *Fish Market*. These purloined elements include, without limitation, the kick, snare and hi-hat patterns of *Fish Market*. The kick drum of *Definitivamente* plays four crotchets per bar beginning on the first beat of each bar as in *Fish Market*. The rim/snare pattern also replicates that of *Fish Market*. The maracas copy excerpts of the tambourine pattern played in *Fish Market*. Further, despite note deviations to match the song's chord structure, the bassline most commonly anchors on beats one and three as in *Fish Market*. The bass line also copies the tone and minimalist structure of that played in *Fish Market*. The drum and bass tracks both together and independently, are substantially similar in rhythmic structures and texture to those of *Fish Market*. As compared to *Fish Market*, the tempo of *Definitivamente* is approximately the same at 100 bpm. These copied elements form the backbone of *Definitivamente* and accordingly, significant portions of *Definitivamente* are substantially similar if not virtually identical to significant portions of *Fish Market*, as shown in the transcripts of portions of each below.


Fish Market
Steely & Clevie
hi hat
tambourine
timbale 1
timbale 2
tom
snare
kick


Definitivamente
♩ = 100
Maracas
Fish Market
Tambourine


Definitivamente
Excerpt as at approx.1:57
♩ = 100
Maracas
Rim
Kick

282. The rhythm section of *Don Don* copies original elements of the *Fish Market* rhythm section, including the original combination of drum patterns featured in *Fish Market*. These purloined elements include, without limitation, the kick, and snare patterns of *Fish Market*. The kick drum of *Don Don* plays four crotchets per bar beginning on the first beat of each bar as in *Fish Market*. The rim copies the snare pattern played in *Fish Market* with the exception of omitting the second eighth note, synonymous with the Fish Market snare pattern. The hi-hat copies the pattern as played on beats one, two, three and four of each bar in *Fish Market* with an additional second eighth note beat on each bar replacing the second eighth note beat omitted from the snare thus completing the original *Fish Market* snare pattern. The drum and bass tracks both together and independently, are substantially similar in rhythmic structures and texture to those of *Fish Market*. Further, despite note deviations to match the song's chord structure, the bassline most commonly anchors on beats one and three as in *Fish Market*. The bass line also copies the tone and minimalist structure of that played in *Fish Market*. These copied elements form the backbone of *Don Don* and accordingly, significant portions of *Don Don* are substantially similar if not virtually identical to significant portions of *Fish Market*, as shown by comparison of the transcripts of portions of each below.

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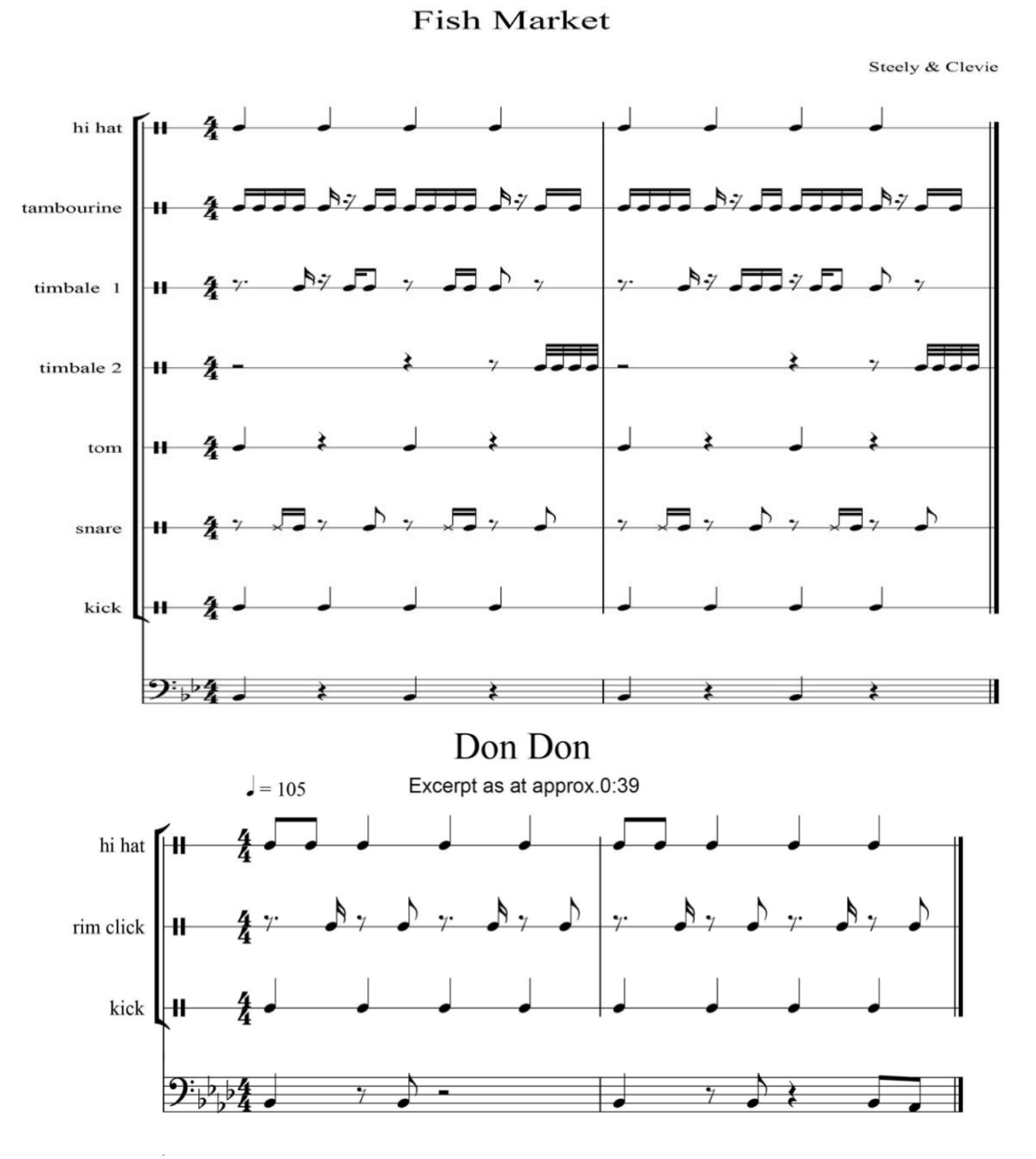
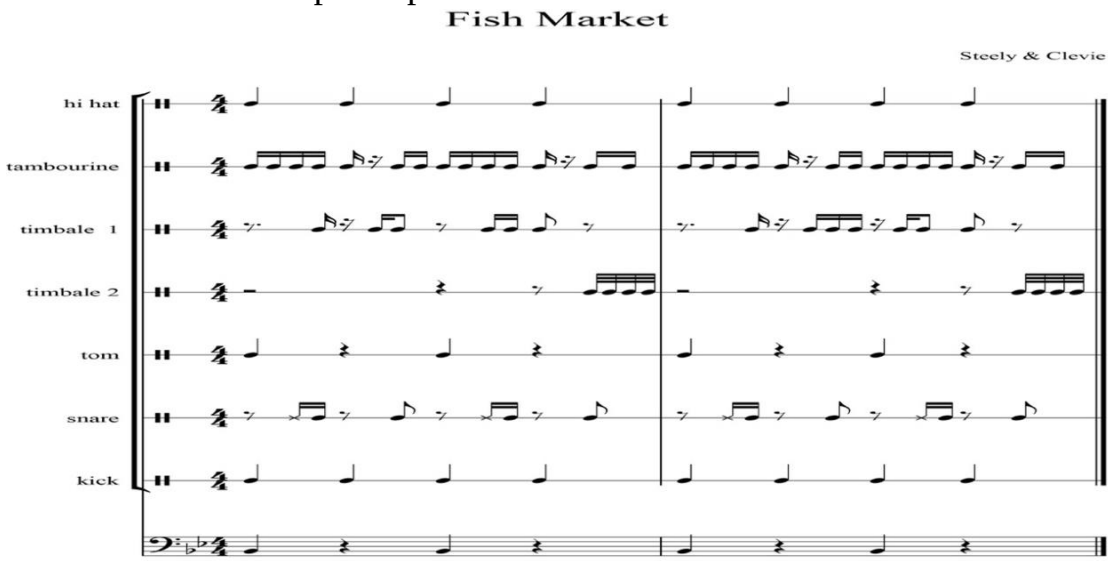
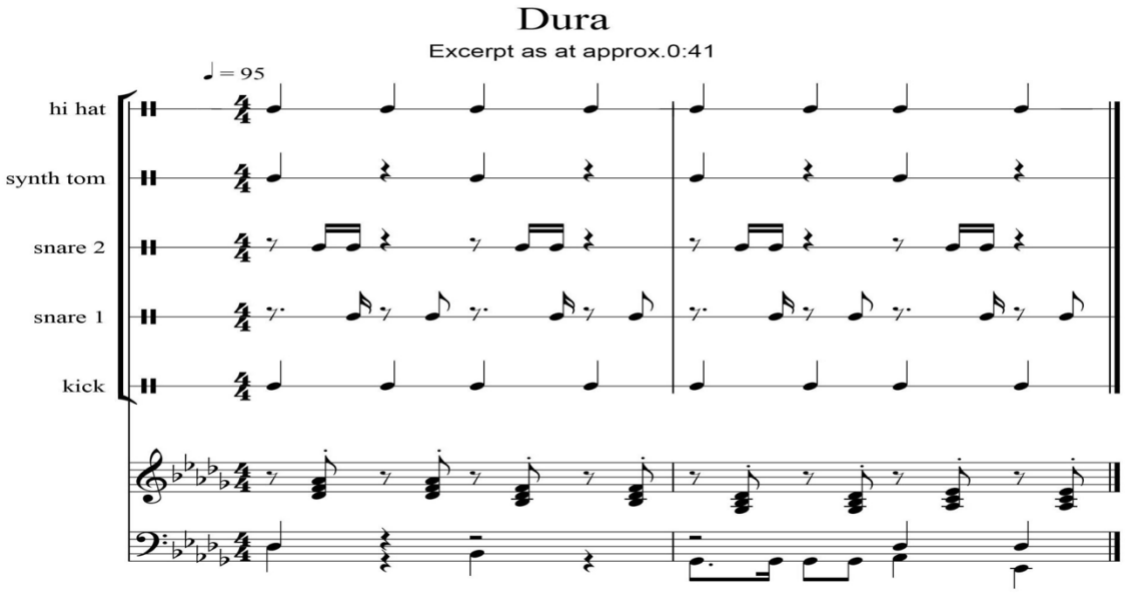


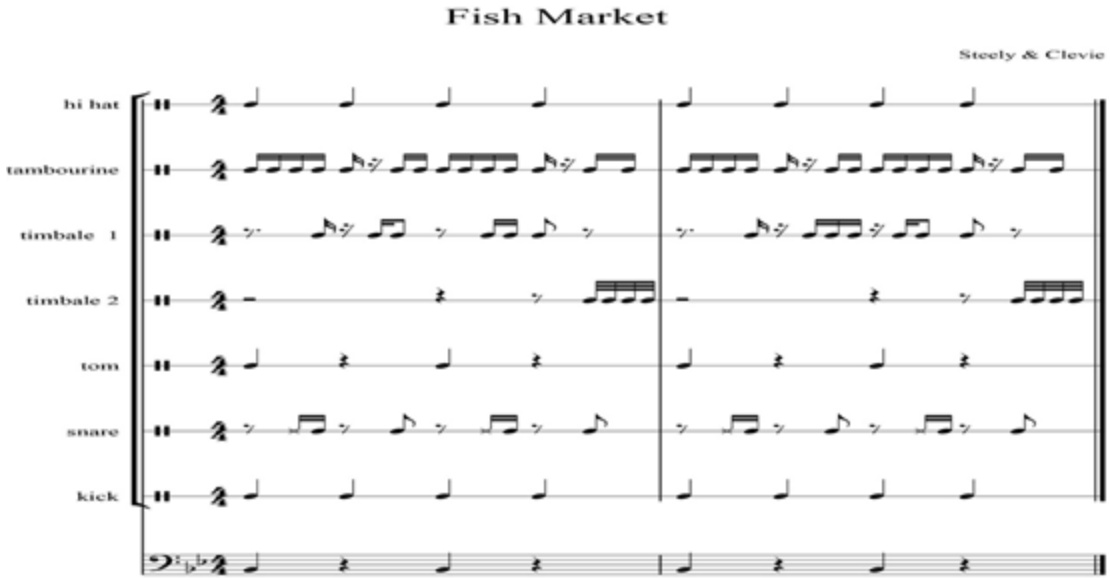
283. The rhythm section of *Dura* copies original elements of the *Fish Market* rhythm section, including the original combination of drum patterns featured in *Fish Market*. These purloined elements include, without limitation, the kick, and snare patterns of *Fish Market*. The kick drum of *Dura* plays four crotchets per bar beginning on the first beat of each bar as in *Fish Market*. The rim/snare pattern also replicates that of *Fish Market*. Synth tom is played on beats one and three as in *Fish*

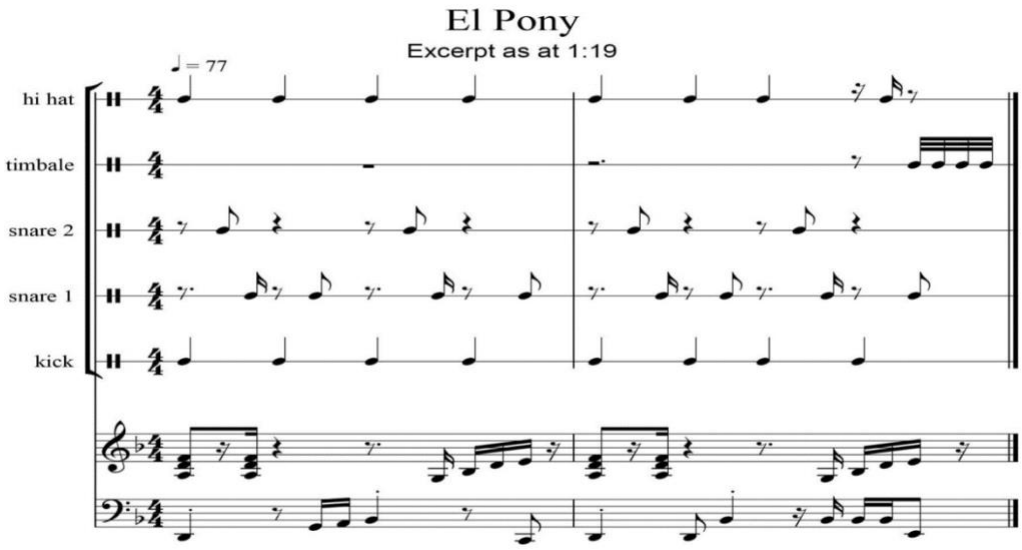
Market. The drum and bass tracks both together and independently, are substantially similar in rhythmic structures and texture to those of *Fish Market*. Further, despite note deviations to match the song's chord structure, the bassline most commonly anchors on beats one and three as in *Fish Market*. The bass line also copies the tone and minimalist structure of that played in *Fish Market*. These copied elements form the backbone of *Dura* and accordingly, significant portions of *Dura* are substantially similar if not virtually identical to significant portions of *Fish Market*, as shown by comparison of the transcripts of portions of each below.





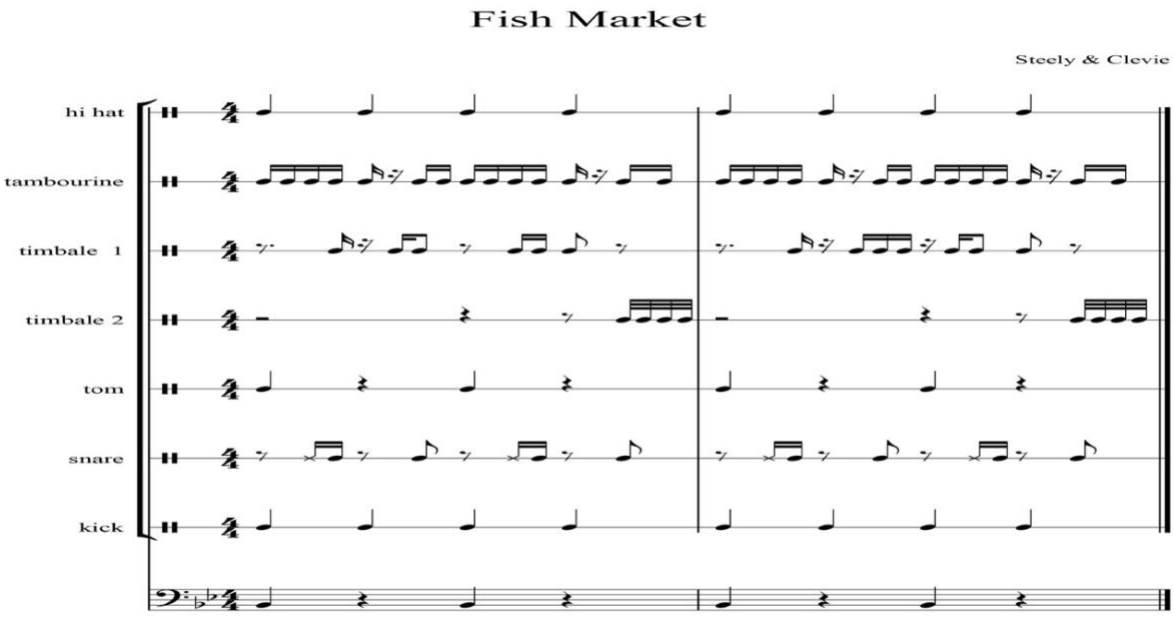
284. The rhythm section of *El Pony* copies original elements of the *Fish Market* rhythm section, including the original combination of drum patterns featured in *Fish Market*. These purloined elements include, without limitation, the kick, and snare patterns of *Fish Market*. The kick drum of *El Pony* plays four crotchets per bar beginning on the first beat of each bar as in *Fish Market*. The hi-hat cymbals play a similar pattern to that of *Fish Market* with a slight variation at the end of the second bar. The rim/snare pattern also replicates that of *Fish Market*. Synth tom is played on beats one and three throughout *El Pony* as in *Fish Market*. However, the synth tom is taken out at 1:19 (the captioned excerpt) and the pattern introduces a 32nd timbale roll at the end of bar two which mimics the timbale roll in *Fish Market*. Further, despite note deviations to match the song's chord structure, the bassline most commonly anchors on beats one and three as in *Fish Market*. The bass line also copies the tone and minimalist structure of that played in *Fish Market*. These copied elements form the backbone of *El Pony* and accordingly, significant portions of *El Pony* are substantially similar if not virtually identical to significant portions of *Fish Market*, as shown by comparison of the transcripts of portions of each below.

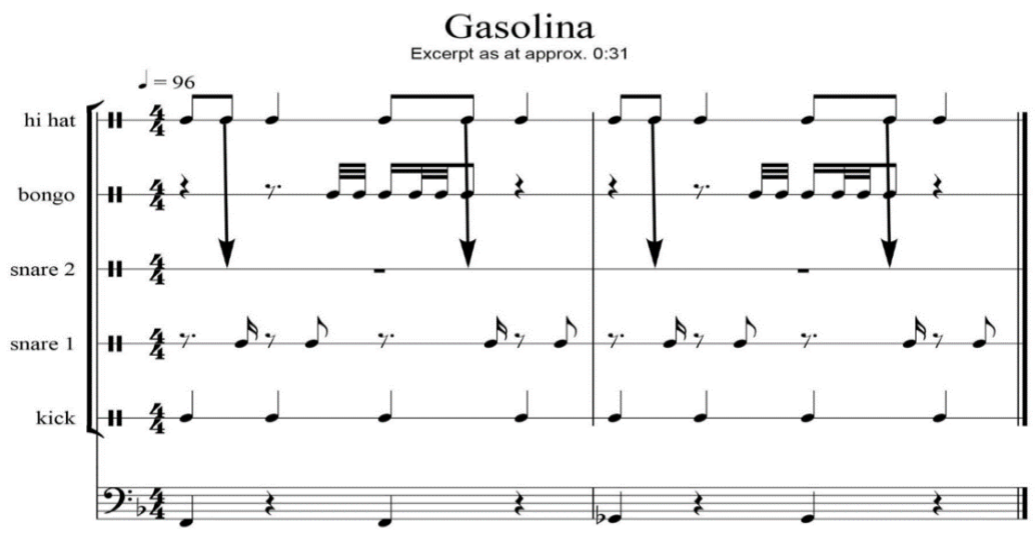




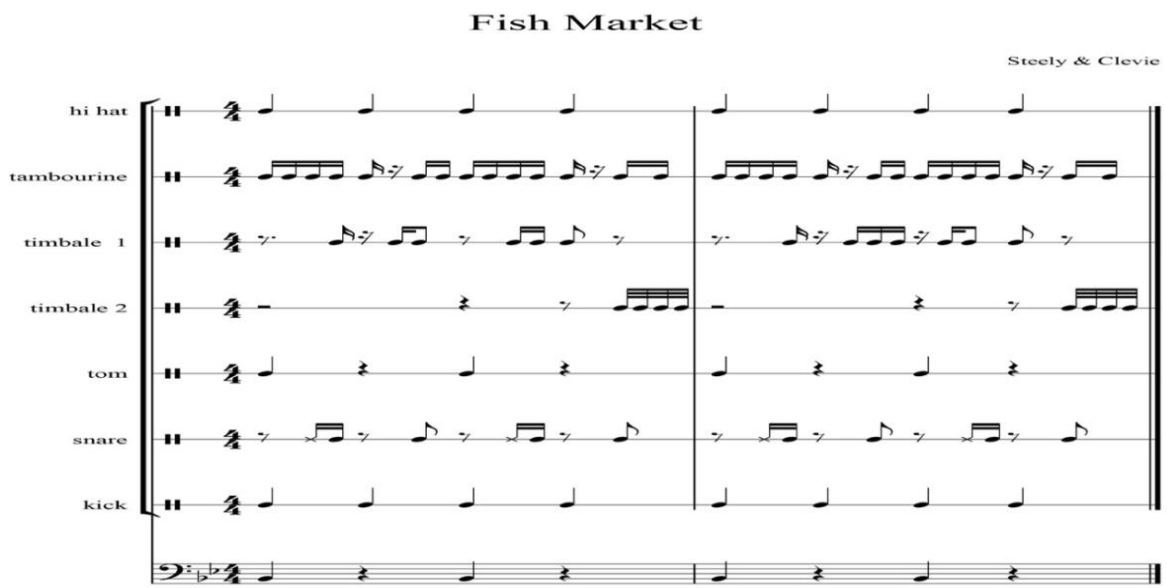
285. The rhythm section of *Gasolina* copies original elements of the *Fish Market* rhythm section, including the original combination of drum patterns featured in *Fish Market*. These purloined elements include, without limitation, the kick, and snare patterns of *Fish Market*. The kick drum of *Gasolina* plays four crotchets per bar beginning on the first beat of each bar as in *Fish Market*. The hi-hat maintains the main accents of the *Fish Market* hi-hat pattern played on beats one, two, three and four of each bar, with additional 8th notes replacing the missing 8th notes as played on the Fish Market snare pattern. Despite the substitution of hi-hat for snare drum on the 2nd and 6th 8th notes of each bar, the rhythm of the combined elements result is the same as *Fish Market*. The combination of the snare drum and hi-hat pattern as played in *Gasolina* gives the same snare and hi-hat audio overlay effect as the pattern played in *Fish Market*. The arrows in the *Gasolina* notation, emanates from the hi-hat substitution note and points to the location where the snare is played in *Fish Market*. The bongos in *Gasolina* serves to substitute the timbales played in *Fish Market* with a slight variation to the pattern. However, despite the substitution of sound, the bongo drum serves well at capturing the overall feel and sonic characteristics found in *Fish Market*. Synth tom is played on beats one and three at various points throughout *Gasolina*, copying the *Fish Market* tom pattern. *Example 0:20 - 0:28, 0:40 - 0:48,

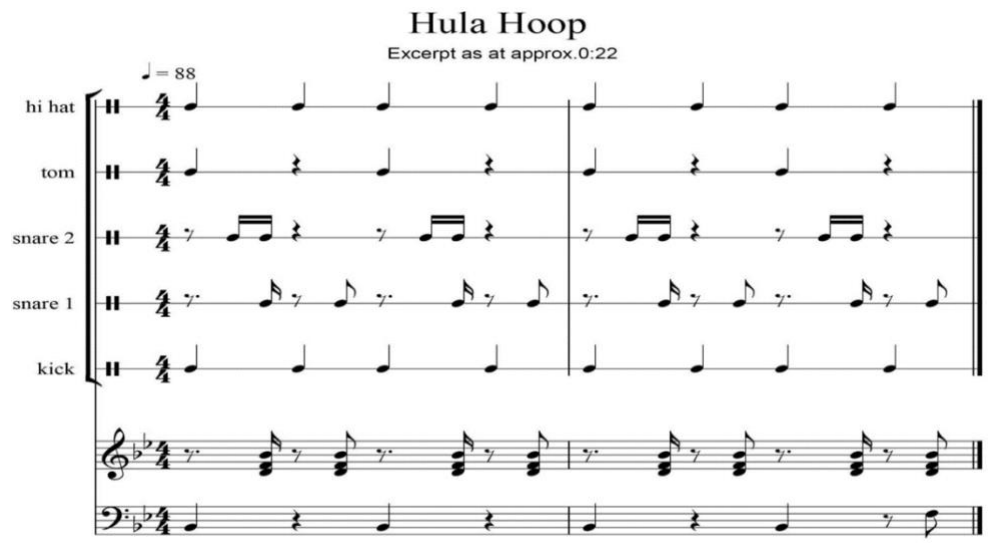
1:00 -1:08, 1:20 - 1:28, etc. (These can be clearly heard at the locations identified in the *examples at the timestamp locations shown above.) The drum and bass tracks both together and independently, are substantially similar in rhythmic structures and texture to those of *Fish Market*. Further, despite note deviations to match the song's chord structure, the bassline most commonly anchors on beats one and three as in *Fish Market*. The bass line also copies the tone and minimalist structure of that played in *Fish Market*. These copied elements form the backbone of *Gasolina* and accordingly, significant portions of *Gasolina* are substantially similar if not virtually identical to significant portions of *Fish Market*, as shown by comparison of the transcripts of portions of each below.





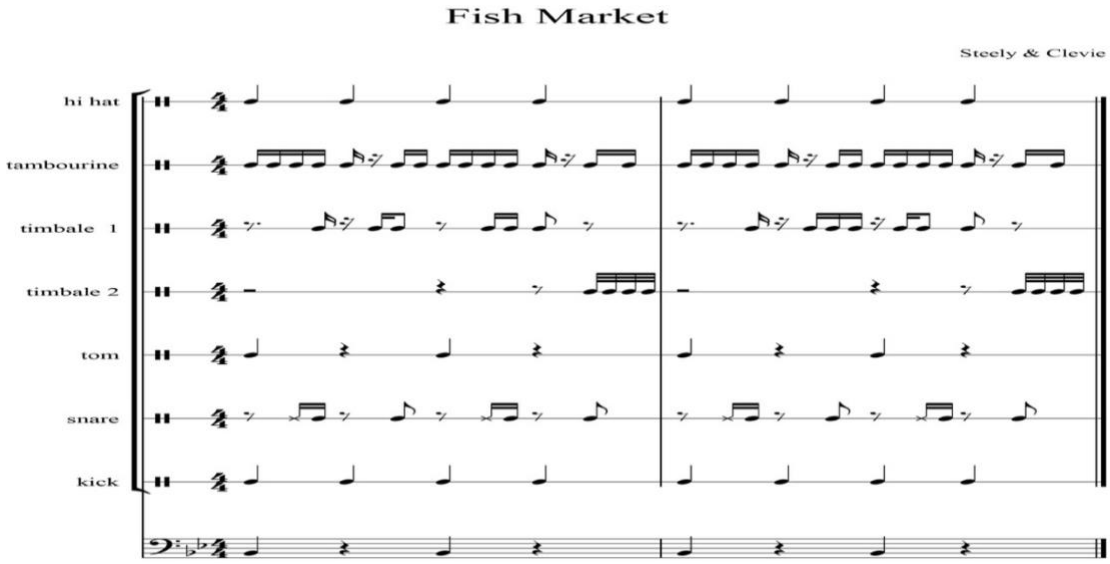
286. The rhythm section of *Hula Hoop* copies original elements of the *Fish Market* rhythm section, including the original combination of drum and bass patterns featured in *Fish Market*. These purloined elements include, without limitation, the kick, and snare patterns of *Fish Market*. As compared to *Fish Market*, the rhythm section of *Hula Hoop* plays the exact pattern with exclusion of the timbales. The kick drum and hi-hat cymbals play on beats one, two, three and four of each bar, while the tom and bass plays on beats one and three. The snare drum is also a copy of the *Fish Market* snare pattern. The bass line on *Hula Hoop*, anchors on beats one and three and plays a Bb (B flat) note as in *Fish Market*. *Hula Hoop* also emulates the sonic characteristics of *Fish Market* with use of similar instrumentation. These include programming utilizing kick, snare, hi-hat and electric tom drums. The bass is synthesized with emphasis on sub frequency tonations. Further, despite note deviations to match the song's chord structure, the bassline most commonly anchors on beats one and three as in *Fish Market*. The bass line also copies the tone and minimalist structure of that played in *Fish Market*. These copied elements form the backbone of *Hula Hoop* and accordingly, significant portions of *Hula Hoop* are substantially similar if not virtually identical to significant portions of *Fish Market*, as shown by comparison of the transcripts of portions of each below.

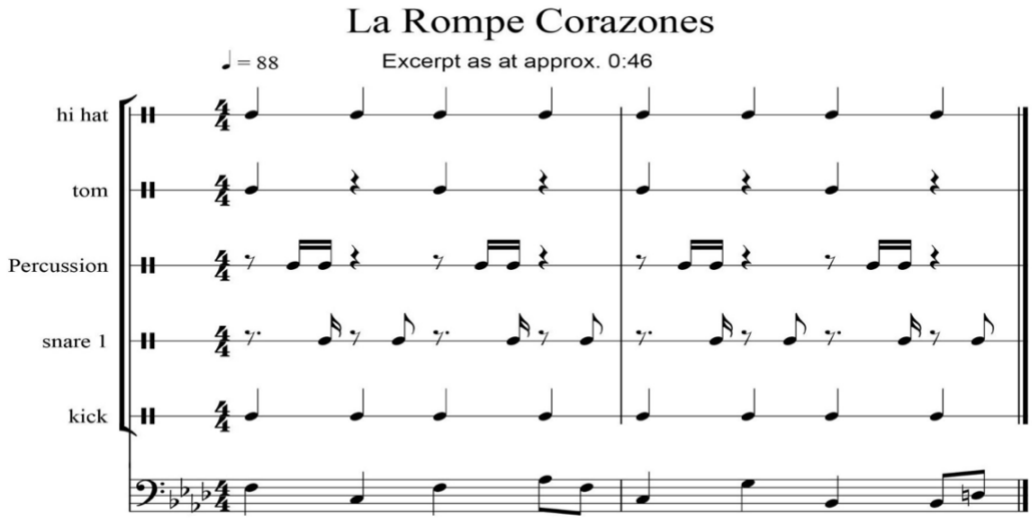




287. The rhythm section of *La Rompe Corazones* copies original elements of the *Fish Market* rhythm section, including the original combination of drum patterns featured in *Fish Market*. These purloined elements include, without limitation, the kick, and snare patterns of *Fish Market*. The kick drum of *La Rompe Corazones* plays four crotchets per bar beginning on the first beat of each bar as in *Fish Market*. The rim/snare pattern also replicates that of *Fish Market*. The snare copies the pattern played in *Fish Market*. The hi-hat of *La Rompe Corazones* copies the pattern as played on beats one, two, three and four of each bar in *Fish Market*. The tom copies

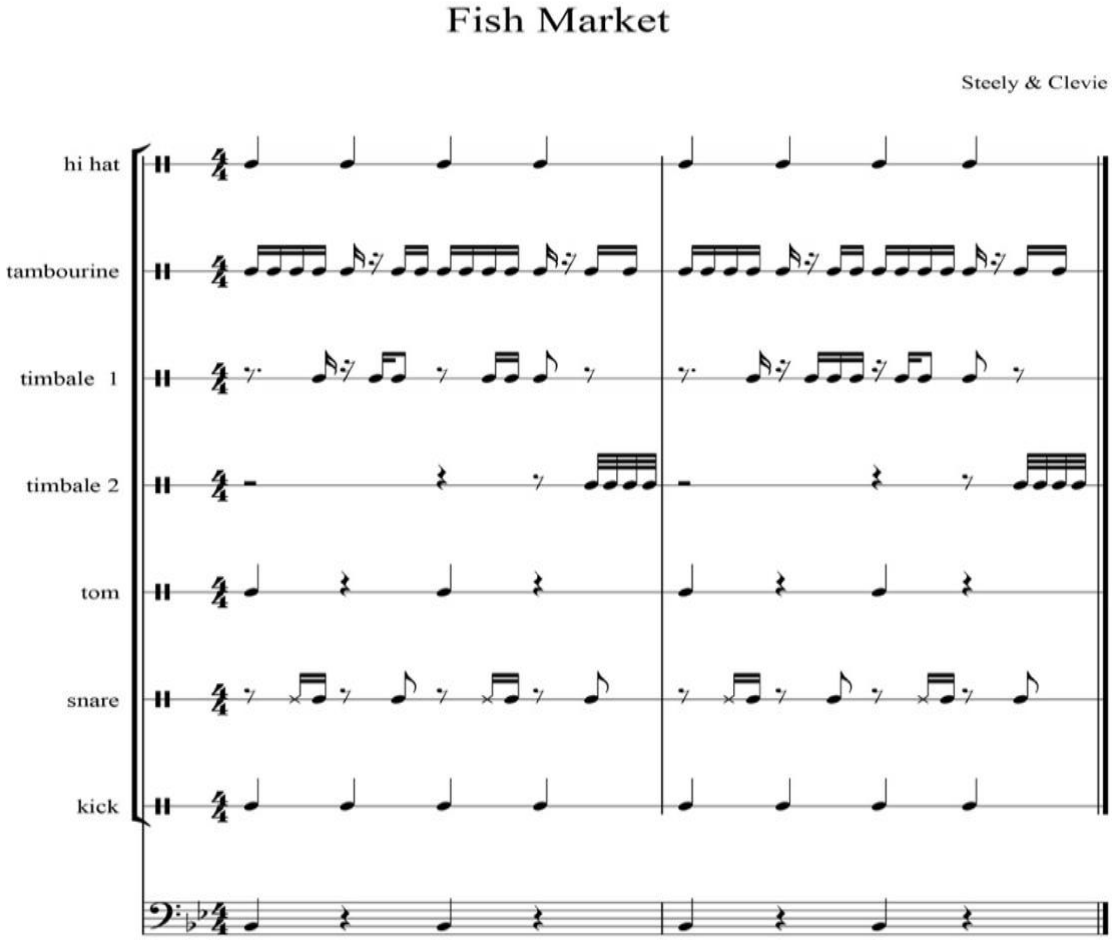
the *Fish Market* tom pattern which is played on the down beats one and three. The bass line copies the minimalist structure of the bass line played in Fish Market. However, despite note deviations to match the song's chord structure, the bassline most commonly anchors on beats one and three as in *Fish Market*. These copied elements form the backbone of *La Rompe Corazones* and accordingly, significant portions of *La Rompe Corazones* are substantially similar if not virtually identical to significant portions of *Fish Market*, as shown by comparison of the transcripts of portions of each below.

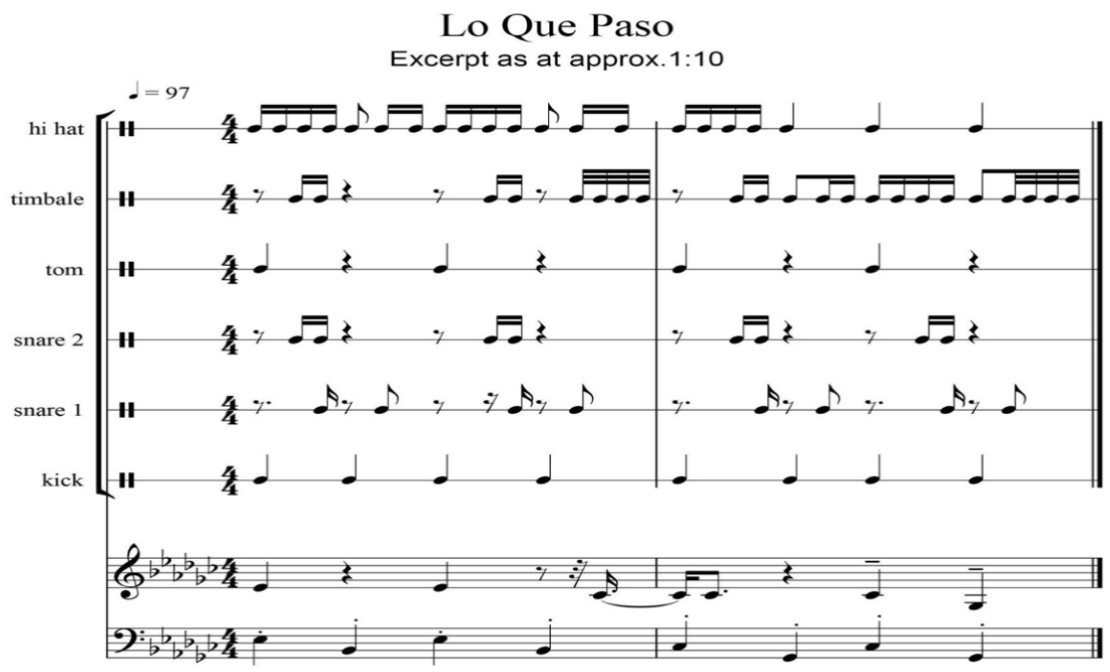




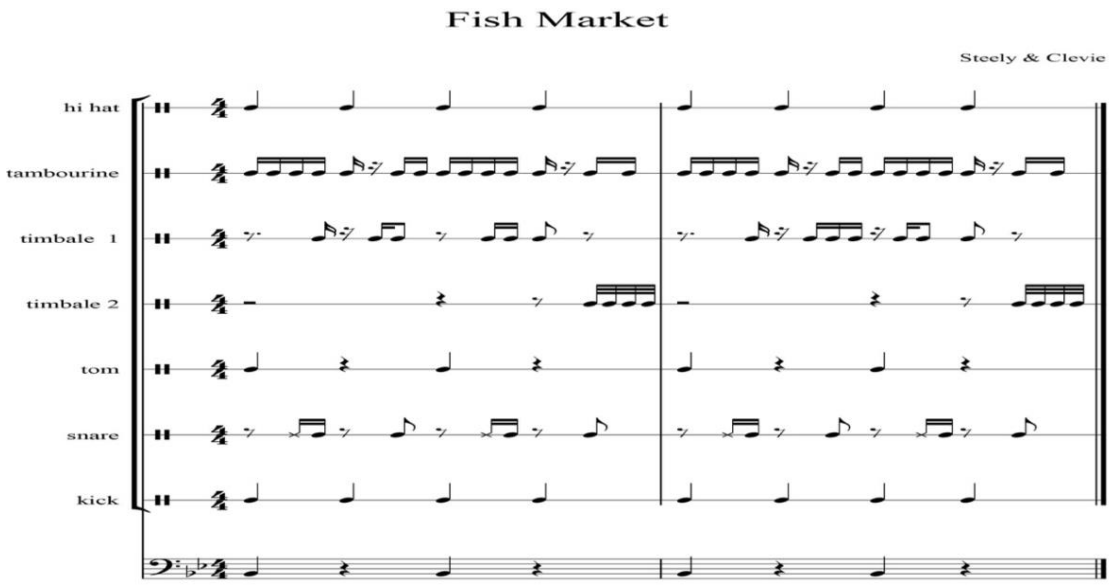
288. The rhythm section of *Lo Que Pasó, Pasó* copies original elements of the *Fish Market* rhythm section, including the original combination of drum patterns featured in *Fish Market*. These purloined elements include, without limitation, the kick drum, snare drum, hi-hat, timbales and synth tom patterns of *Fish Market*, replicating the same combined patterns as contained in *Fish Market*, with the exception of a maracas replacing the tambourine in *Fish Market*. *Lo Que Pasó, Pasó* is composed of layered elements of drums which includes programmed drums and sampled drum loops. The kick drum plays on beats one, two, three and four of each bar complemented by the original *Fish Market* snare pattern as shown in the attached notation excerpt. The hi-hat and maracas in combination, seems aimed at capturing the hi-hat and tambourine pattern in *Fish Market*. However, the instrument interplay in *Lo Que Pasó, Pasó* is not definitively clear, therefore the notation excerpt combines both patterns on a single line of the score; here notated as a combined pattern on the hi-hat line. The timbale pattern is the same unique original pattern contained in *Fish Market*. Synth tom is played on beats one and three as in *Fish Market*. The bass plays on all four beats of each bar with notes in line with the new chord structure. However, the track also features a 'mid-range frequency' second bass track playing on beats one and three as in *Fish Market*. The drum and bass tracks both together and independently, are substantially similar in rhythmic structures and texture to those of *Fish Market*. The kick, snare, hi-hat and bass are prominent in the mix of *Lo Que Pasó, Pasó* which emulates the sonic texture of *Fish Market*, giving the song a similar feel. The sonic elements as contained in the looped drum samples, are indicative of a frequency manipulated audio sample in which the low frequencies are reduced. This procedure may have been applied to allow for masking of bass note clashes. This can be beneficial to musical outcomes particularly in cases in which the key of a 'bass heavy' sample is different from that of the new work in which the sample is applied. In this case, the key is Eb as opposed to Bb in the case of *Fish*

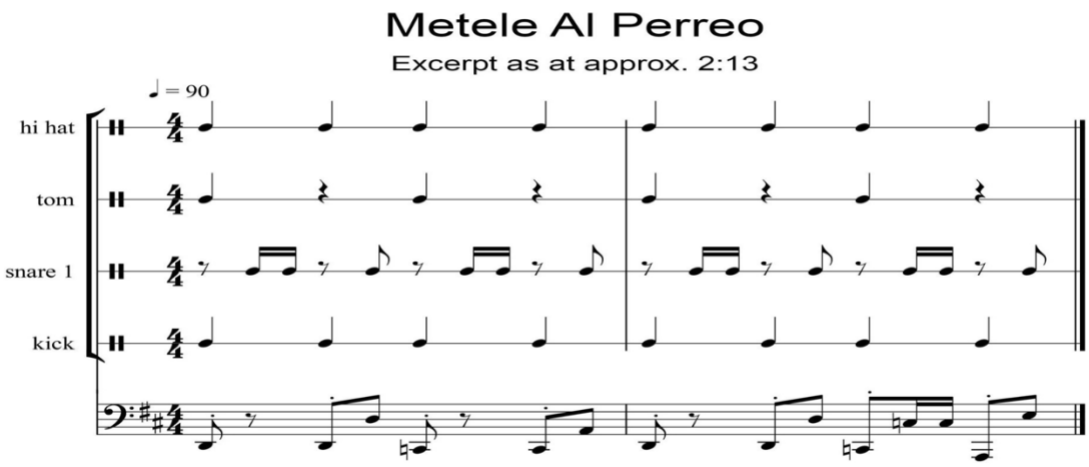
Market. Based on the combined identifiable factors of drum pattern, drum sound and instrumentation, the sample contained in *Lo Que Pasó, Pasó* is consistent with the *Pounder*; a re-recorded version of *Fish Market*. These copied elements form the backbone of *Lo Que Pasó, Pasó* and accordingly, significant portions of *Lo Que Pasó, Pasó* are substantially similar if not virtually identical to significant portions of *Fish Market*, as shown by comparison of the transcripts of portions of each below. Further, sampling of the sound recording of the *Pounder* provides direct evidence of copying of the *Fish Market* composition.





289. The rhythm section of *Mételе Al Perreo* copies original elements of the *Fish Market* rhythm section, including the original combination of drum patterns featured in *Fish Market*. These purloined elements include, without limitation, the kick, and snare patterns of *Fish Market*. The kick drum and hi-hat of *Mételе Al Perreo* plays four crotchets per bar beginning on the first beat of each bar as in *Fish Market*. The rim/snare pattern also replicates that of *Fish Market*. Synth tom is played on beats one and three which is the same pattern as *Fish Market*. The bass line played on *Mételе Al Perreo* copies the tone and minimalist structure of the bass line played in *Fish Market*, with emphasis placed on beats 1 and 3 of each bar to direct the chord movements. However, there are minor note deviations to match the *Mételе Al Perreo* key and chord structure. The *Mételе Al Perreo* drum and bass tracks deliver retains the rhythmic structures and texture of *Fish Market*. These copied elements form the backbone of *Mételе Al Perreo* and accordingly, significant portions of *Mételе Al Perreo* are substantially similar if not virtually identical to significant portions of *Fish Market*, as shown by comparison of the transcripts of portions of each below.





290. The rhythm section of *Muévelo* copies original elements of the *Fish Market* rhythm section, including the original combination of drum patterns featured in *Fish Market*. These purloined elements include, without limitation, the kick, and snare patterns of *Fish Market*. As compared to *Fish Market*, the rhythm section contained in *Muévelo*, features similar drum parts as contained in *Fish Market*, namely, kick drum, snare drums, hi-hat, timbales and tom. These parts are structured/performed so as to replicate the drum patterns as contained in *Fish Market*. *Muévelo* appears to be comprised of layered elements of drums which may include programmed drums and/or looped drum samples. The kick drum plays on the down

beats one, two, three and four of each bar as performed in *Fish Market*. The snare pattern is the same as the snare pattern in *Fish Market*. The hi-hat is also a copy of the *Fish Market* minimalistic hi-hat pattern with four crochets played on down beats one, two, three and four. The timbale pattern is the same as contained in *Fish Market*. However, the timbre of the instrument is in line with the *Fish Market* cover version, the *Pounder*. Synth tom is played on beats one and three as in *Fish Market*. The bass in this work, plays on all four beats of each bar. However, it anchors heavily on the song's root note 'D' which is played on beats 1 and 3 thus accentuating and copying the rhythmic pattern of the *Fish Market* bass. The sonic elements as contained in the looped drum samples are indicative of a frequency manipulated audio sample in which the low frequencies are reduced. This procedure may have been applied to allow for masking of bass note clashes. This can be beneficial to musical outcomes particularly in cases in which the key of a 'bass heavy' sample is different from that of the new work in which the sample is applied. In this case, the key is D as opposed to Bb in the case of *Fish Market*. Based on the combined identifiable factors of drum pattern, drum sound and instrumentation, an audio sample infringement is suspected and is sonically consistent with the *Pounder*. The drum and bass tracks both together and independently, are substantially similar in rhythmic structures and texture to those of *Fish Market*. These copied elements form the backbone of *Muévelo* and accordingly, significant portions of *Muévelo* are substantially similar if not virtually identical to significant portions of *Fish Market*, as shown by comparison of the transcripts of portions of each below.

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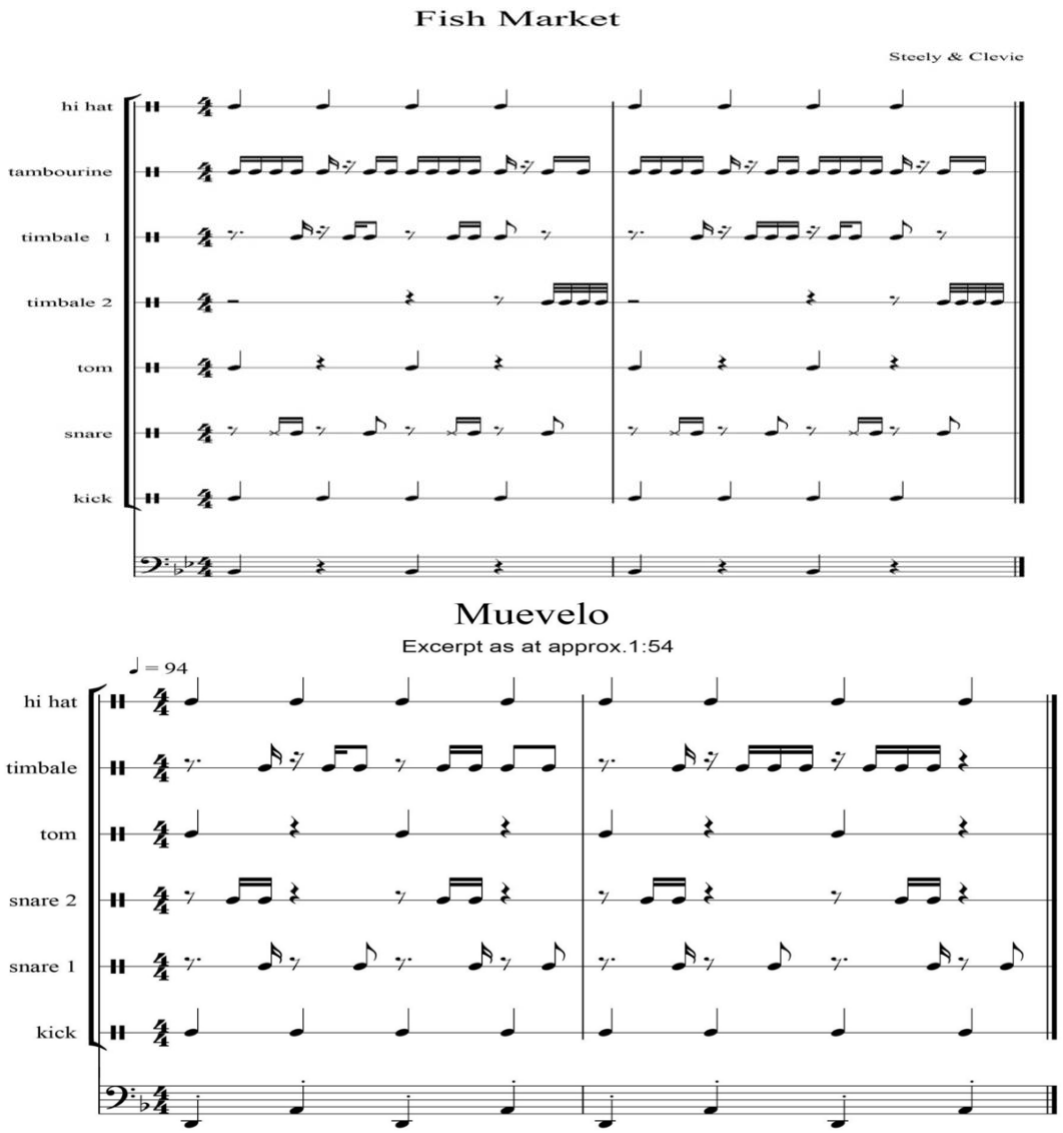
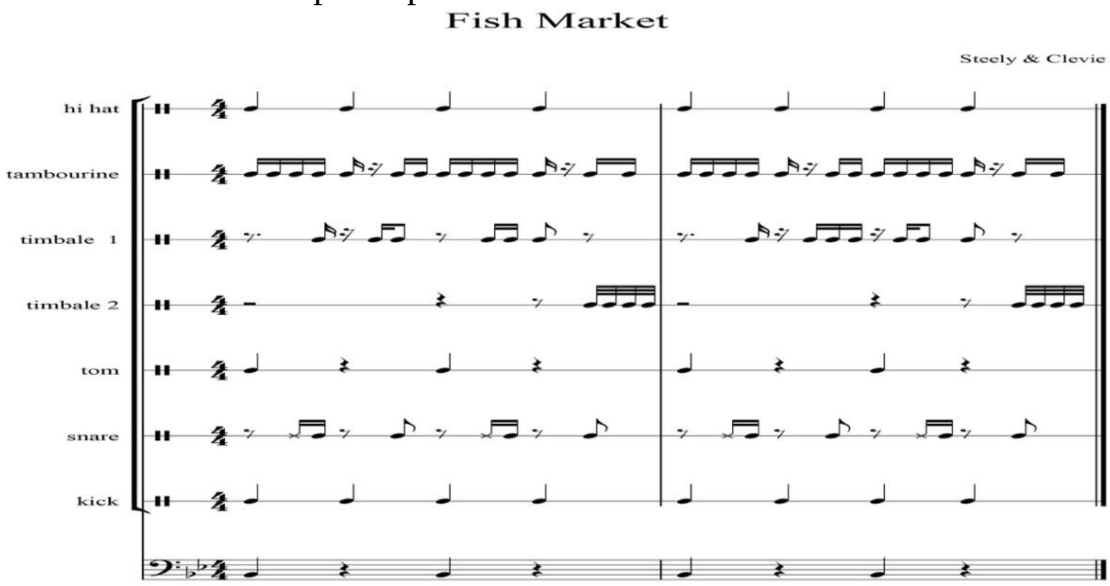
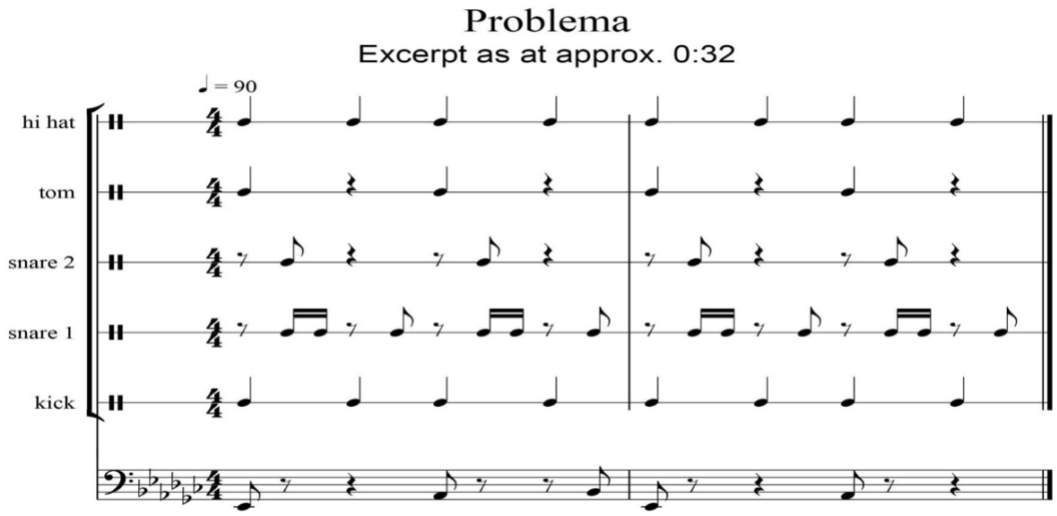


291. The rhythm section of *Problema* copies original elements of the *Fish Market* rhythm section, including the original combination of drum patterns featured in *Fish Market*. These purloined elements include, without limitation, the kick, and snare patterns of *Fish Market*. As in *Fish Market*, the kick drum and hi-hat of *Problema* play four crotchets per bar beginning on the first beat of each bar. The snare drum copies the snare drum pattern played in *Fish Market*. Synth tom is played on beats one and three which is the same pattern as *Fish Market*. The bass line played on *Problema* copies the tone and minimalist structure of the bass line played in *Fish Market*, with emphasis placed on beats 1 and 3 of each bar. The drum and bass tracks

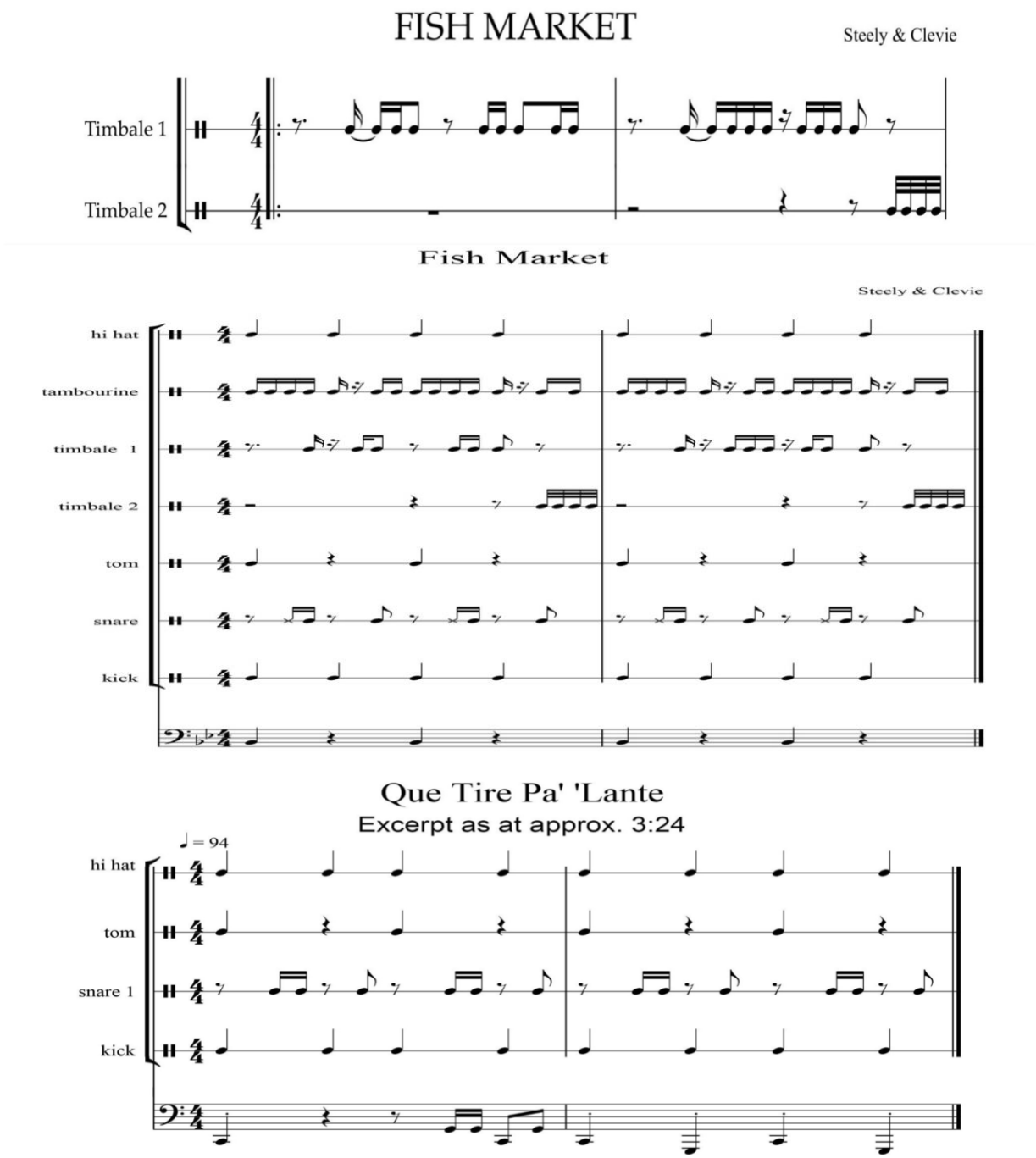
both together and independently, are substantially similar in rhythmic structures and texture to those of *Fish Market*. These copied elements form the backbone of *Problema* and accordingly, significant portions of *Problema* are substantially similar if not virtually identical to significant portions of *Fish Market*, as shown by comparison of the transcripts of portions of each below.





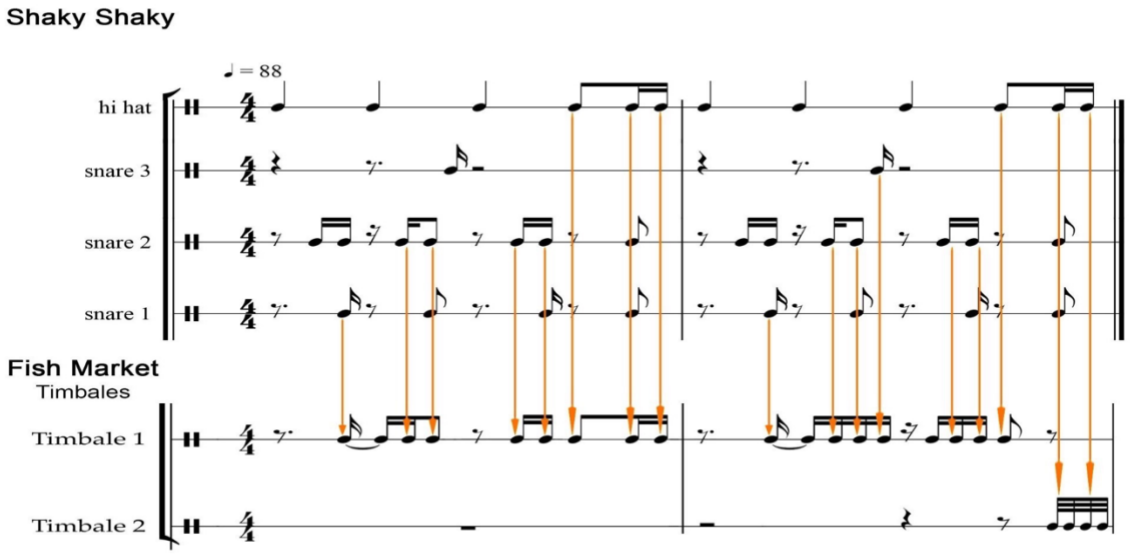
292. The rhythm section of *Que Tire Pa' 'Lante* copies original elements of the *Fish Market* rhythm section, including the original combination of drum patterns featured in *Fish Market*, which form the main rhythm section of *Que Tire Pa' 'Lante*. *Que Tire Pa' 'Lante* also includes a sample of *Pounder*. In addition, *Que Tire Pa'*

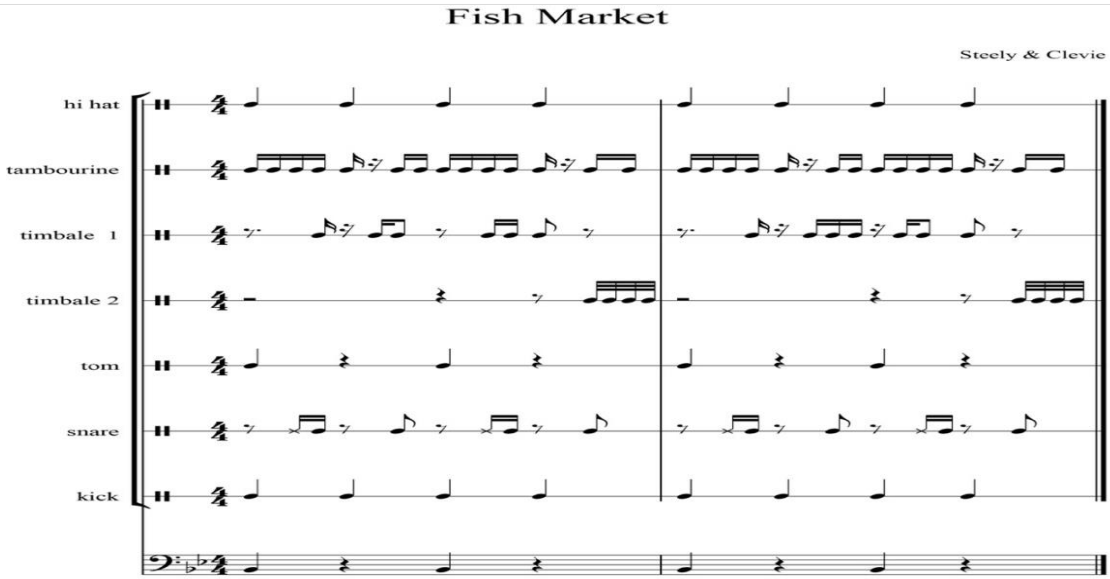
'Lante appears to intersperse samples of other dancehall tracks of the era following *Fish Market* including "A Who Seh Me Done" by Phillip Anthony Thomas p/k/a Cutty Ranks, released 1992, and "Hot This Year" by Patrick Thompson p/k/a Dirtsman, released 1992. The purloined elements of *Fish Market* include, without limitation, the kick, and snare patterns of *Fish Market*. The kick drum and hi-hat play four crotchets per bar beginning on the first beat of each bar. The snare drum copies the snare drum pattern played in *Fish Market*. A timbale 32nd beats roll can be heard at approximately 2:35 in *Que Tire Pa' 'Lante*. This is a significant musical element original to *Fish Market* and occurs at the same bar location point in *Que Tire Pa' 'Lante* as in *Fish Market*. See below for *Fish Market* timbale 2 notation excerpt. The synth tom of *Que Tire Pa' 'Lante* is played on beats one and three which is the same pattern as *Fish Market*. The bass line played on *Que Tire Pa' 'Lante* copies the tone and minimalist structure of the bass line played in *Fish Market*. This pattern can be heard at approximately 2:56 in the *Que Tire Pa' 'Lante* (in which the bass is played on beats 1 and 3). Based on the combined identifiable factors of drum pattern, drum sound and instrumentation, an audio sample infringement is suspected and is sonically consistent with the *Pounder*. In addition, *Que Tire Pa' 'Lante* appears to include audio samples from the sound recording of *Fish Market*, for example from the intro phrase of *Fish Market* at approximately 3:03-3:07 and truncated at 0:12, 0:20, and 0:25. These copied elements form the backbone of *Que Tire Pa' 'Lante* and accordingly, significant portions of *Que Tire Pa' 'Lante* are substantially similar if not virtually identical to significant portions of *Fish Market*, as shown by comparison of the transcripts of portions of each below.

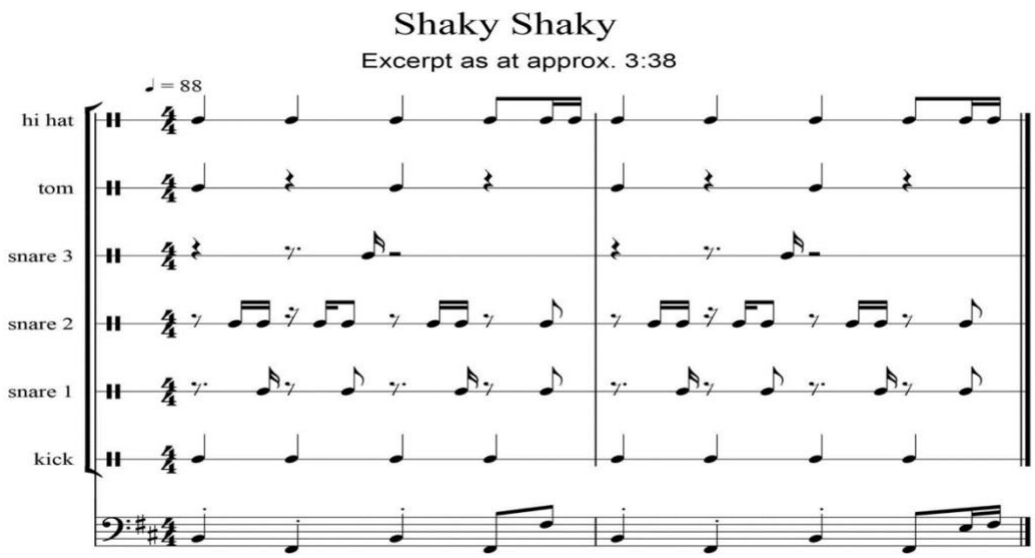


293. The rhythm section of *Shaky Shaky* copies original elements of the *Fish Market* rhythm section, including the original combination of drum patterns featured in *Fish Market*. These purloined elements include, without limitation, the kick, hi-hat and snare patterns of *Fish Market*. As compared to *Fish Market*, the drum and bass tracks feature similar patterns as follows: The kick drum copies that of *Fish Market*

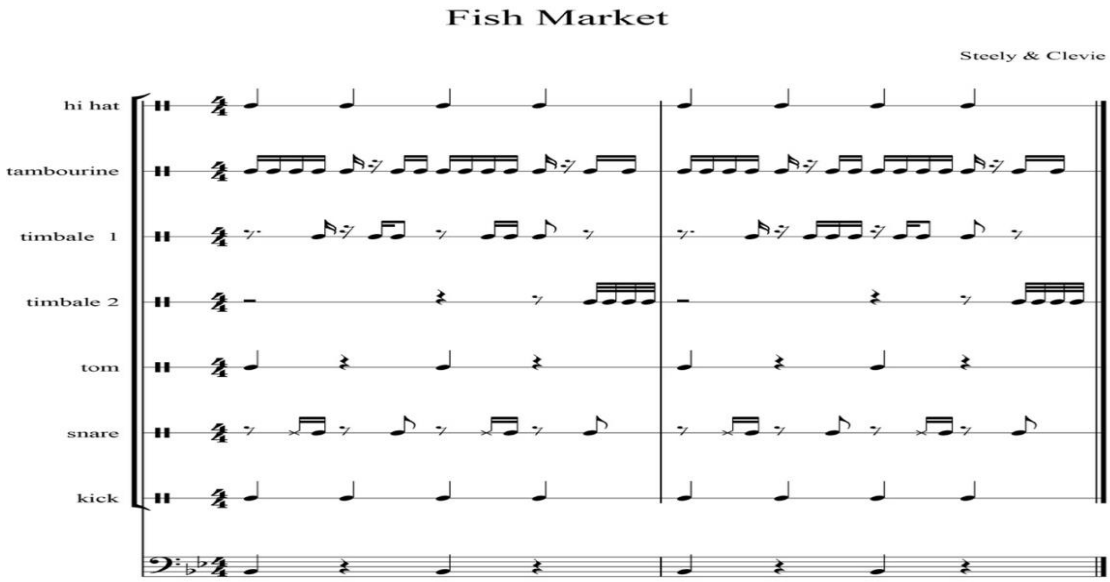
playing four crotchets per bar beginning on the first beat of each bar. The hi-hat plays the same pattern as *Fish Market* with the addition of 2 16th beats at the end of each bar. The snare 1 pattern is the same as *Fish Market*'s. Snare 2 has a minor deviation with the addition of a single 16th beat on the 6th sixteenth note of each bar. Snare 3 adds another beat being the 8th sixteenth beat of each bar. These changes have very little impact on the outcome as it relates to the overall rhythmic similarity as compared to *Fish Market*. This is so as the combination of all the snares and additional hi-hat elements, results in a copy of the snare and timbale 1 patterns as composed in *Fish Market*. See comparative notation below. The colored lines show the *Shaky Shaky* connecting beats which formulates the timbale pattern played on *Fish Market*. These beats have been distributed around various drums recreating the same rhythmic elements found in *Fish Market*. The timbale 32nd beats roll played on *Fish Market*, is substituted by a pick guitar on *Shaky Shaky* similarly filling the space. A tom is played on beats one and three, copying the tom pattern in *Fish Market*. The bass line played on *Shaky Shaky* copies the tone and minimalist structure of that played in *Fish Market*. The drum and bass tracks both together and independently, are substantially similar in rhythmic structures and texture to those of *Fish Market*. These copied elements form the backbone of *Shaky Shaky* and accordingly, significant portions of *Shaky Shaky* are substantially similar if not virtually identical to significant portions of *Fish Market*, as shown by comparison of the transcripts of portions of each below.

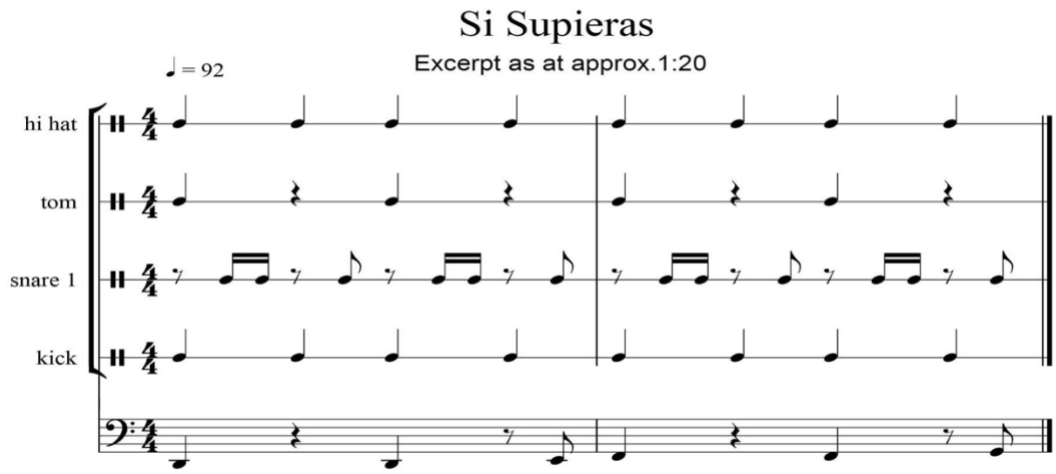

Shaky Shaky
♩ = 88
hi hat
snare 3
snare 2
snare 1
Fish Market
Timbales
Timbale 1
Timbale 2


Fish Market
Steely & Clevie
hi hat
tambourine
timbale 1
timbale 2
tom
snare
kick



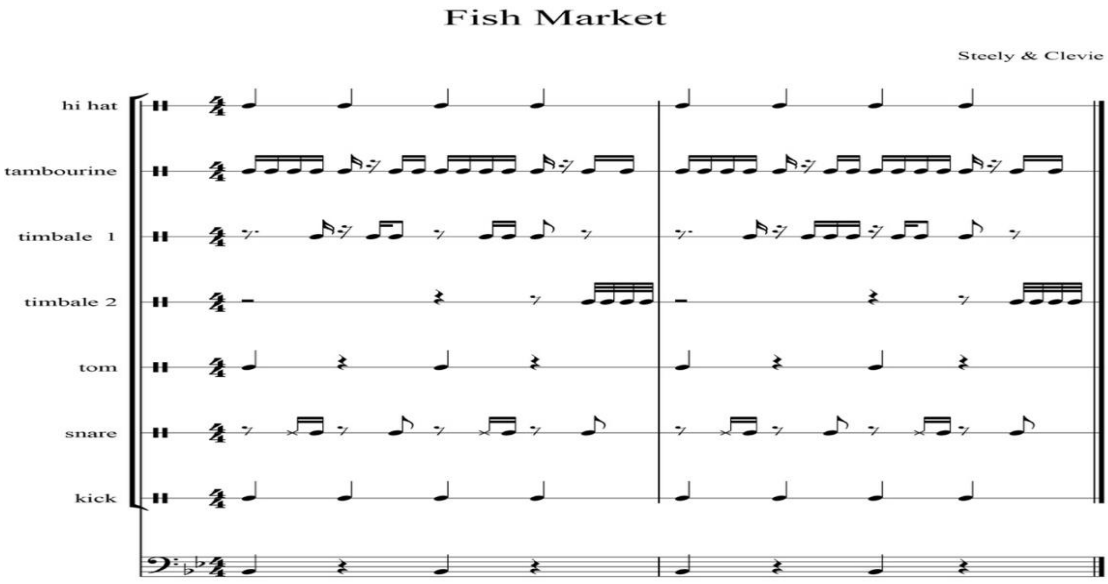
294. The rhythm section of *Si Supieras* copies original elements of the *Fish Market* rhythm section, including the original combination of drum patterns featured in *Fish Market*. These purloined elements include, without limitation, the kick, and snare patterns of *Fish Market*. The kick drum of *Si Supieras* plays four crotchets per bar beginning on the first beat of each bar as in *Fish Market*. The snare copies the pattern played in *Fish Market*. The hi-hat copies the pattern as played on beats one, two, three and four of each bar in *Fish Market*. The tom copies the *Fish Market* tom pattern which is played on the down beats one and three. The bass line copies the minimalist structure of the bass line played in *Fish Market*, with emphasis placed on beats 1 and 3 of each bar. However, there are note deviations to match the new chord structure. The drum and bass tracks both together and independently, are substantially similar in rhythmic structures and texture to those of *Fish Market*. These copied elements form the backbone of *Si Supieras* and accordingly, significant portions of *Si Supieras* are substantially similar if not virtually identical to significant portions of *Fish Market*, as shown by comparison of the transcripts of portions of each below.

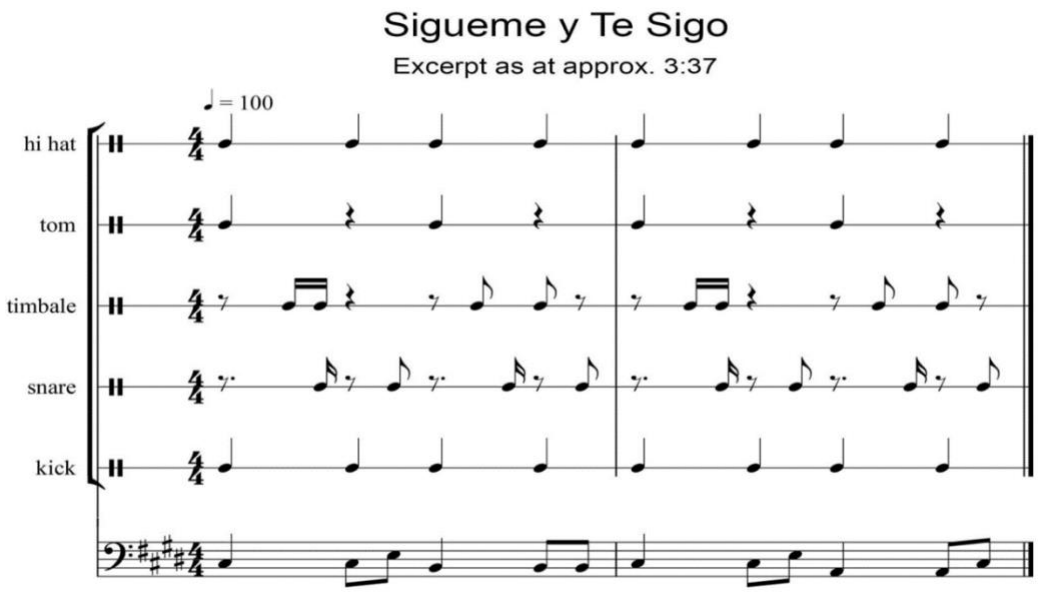




295. The rhythm section of *Sígueme y Te Sigo* copies original elements of the *Fish Market* rhythm section, including the original combination of drum patterns featured in *Fish Market*. These purloined elements include, without limitation, the kick, and snare patterns of *Fish Market*. The kick drum and hi-hat of *Sígueme y Te Sigo* plays four crotchets per bar beginning on the first beat of each bar as in *Fish Market*. The snare pattern also replicates that of *Fish Market* with the timbale filling in the missing lead in snare drum on the third 16th beat of each bar, thus completing the original snare pattern. The timbale also helps to capture the timbre associated with the *Fish Market* sound. The tom is played on beats one and three, copying the tom pattern in *Fish Market*. The bass line anchors heavily on beats one and three and

copies the tone and minimalist structure of that played in *Fish Market*. The drum and bass tracks both together and independently, are substantially similar in rhythmic structures and texture to those of *Fish Market*. These copied elements form the backbone of *Sígueme y Te Sigo* and accordingly, significant portions of *Sígueme y Te Sigo* are substantially similar if not virtually identical to significant portions of *Fish Market*, as shown by comparison of the transcripts of portions of each below.





296. The rhythm section of *Zum Zum* copies original elements of the *Fish Market* rhythm section, including the original combination of drum patterns featured in *Fish Market*. These purloined elements include, without limitation, the kick, and snare patterns of *Fish Market*. The kick drum of *Zum Zum* plays four crotchets per bar beginning on the first beat of each bar as in *Fish Market*. Snare 1 and snare 2 together formulate the snare pattern played in *Fish Market*. The hi-hat (in bar 1) copies the pattern as played on the down beats one, two, three and four in *Fish Market*. The timbale copies the 32nd beat (timbale 2) roll as at the end of bar two in *Fish Market*. The high percussion replaces the tambourine in *Fish Market* and fills in the rhythmic component and frequency bandwidth synonyms with *Fish Market*. The bass drum copies the bass as played in *Fish Market*, this being on beats one and three. The drum and bass tracks deliver strong retention of the rhythmic structures and timbre of *Fish Market*. The bass line also copies the tone and minimalist structure of that played in *Fish Market*. These copied elements form the backbone of *Zum Zum* and accordingly, significant portions of *Zum Zum* are substantially similar if not virtually identical to significant portions of *Fish Market*, as shown by comparison of the transcripts of portions of each below.

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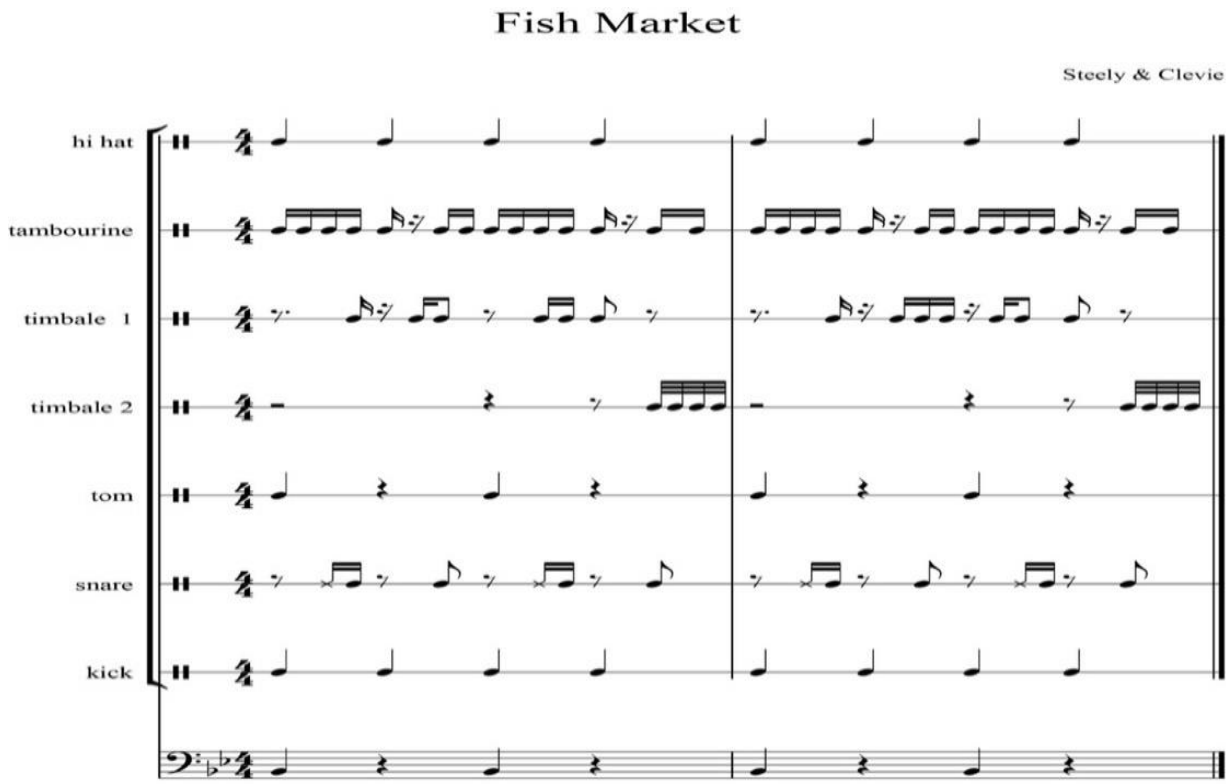
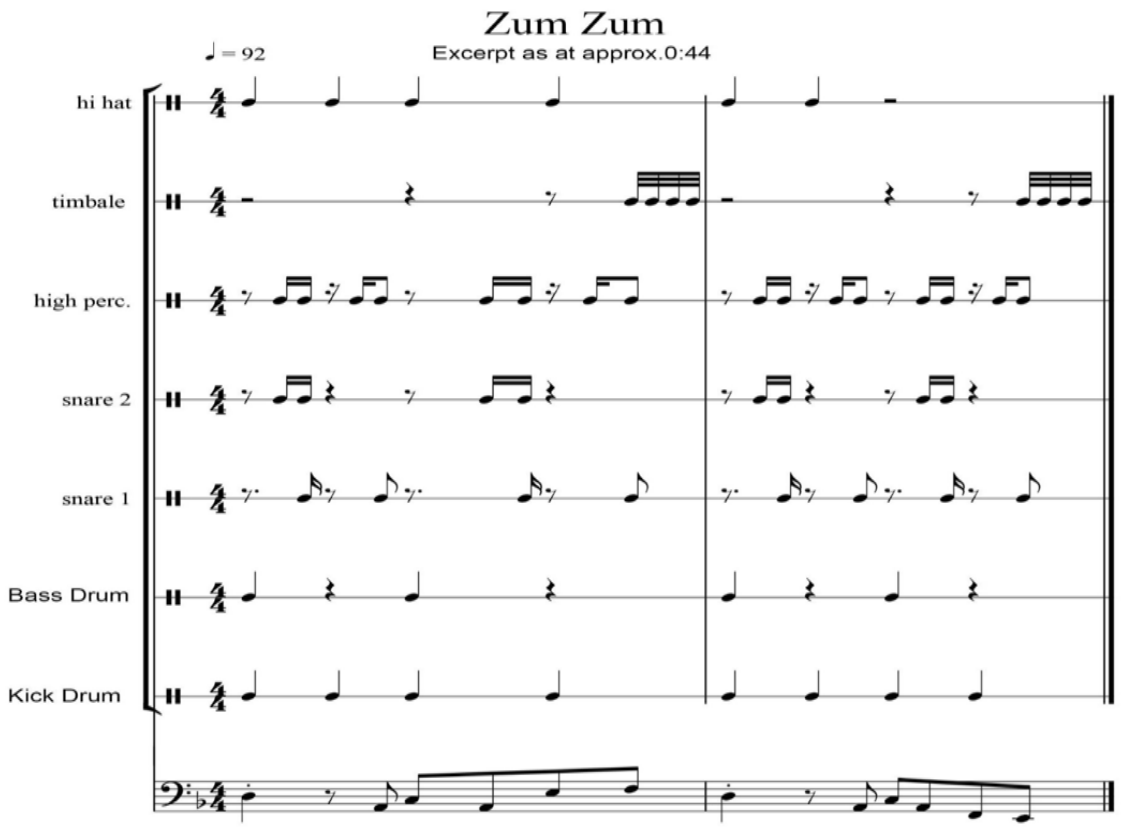

Fish Market
Steely & Clevie
hi hat
tambourine
timbale 1
timbale 2
tom
snare
kick


Zum Zum
♩ = 92
Excerpt as at approx.0:44
hi hat
timbale
high perc.
snare 2
snare 1
Bass Drum
Kick Drum

Abraham Mateo Allegations

297. As shown in the accompanying Exhibit A, Abraham Mateo and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *A Cámara Lenta*, *Esta Cuarentena*, *Loco Enamorado*, *Me Vuelvo Loco*, *No Encuentro Palabras*, *¿Qué Ha Pasao'?*, *Se Acabó el Amor*, and *Tiempo Pa Olvidar*.

298. Each of *A Cámara Lenta*, *Esta Cuarentena*, *Loco Enamorado*, *Me Vuelvo Loco*, *No Encuentro Palabras*, *¿Qué Ha Pasao'?*, *Se Acabó el Amor*, and *Tiempo Pa Olvidar* (collectively, the "Abraham Mateo Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

299. Each of the Abraham Mateo Works incorporates an unauthorized sample of the *Fish Market* recording and/or a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

300. A comparison of *Fish Market* and each of the Abraham Mateo Works establishes that each of the Abraham Mateo Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and/or composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Alex Sensation Allegations

301. As shown in the accompanying Exhibit A, Alex Sensation and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Dame Un Chance*, *La Calle*, *La Diabla*, *La Mala Y La Buena*, *Pa' Lante*, and *Que Va*.

302. Each of *Dame Un Chance*, *La Calle*, *La Diabla*, *La Mala Y La Buena*, *Pa' Lante*, and *Que Va* (collectively, the "Alex Sensation Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

303. Each of the Alex Sensation Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

304. A comparison of *Fish Market* and each of the Alex Sensation Works establishes that each of the Alex Sensation Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Anitta Allegations

305. As shown in the accompanying exhibit, Anitta and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Downtown*, *Goals*, *Juego*, *Loco*, *Medicina*, *Paradinha*, *Si O No*, *Sim Ou Não*, *Sin Miedo*, *Some Que Ele Vem Atrás*, *Terremoto*, *Tócame*, *Tu Y Yo*, and *Veneno*.

306. Each of *Downtown*, *Goals*, *Juego*, *Loco*, *Medicina*, *Paradinha*, *Si O No*, *Sim Ou Não*, *Sin Miedo*, *Some Que Ele Vem Atrás*, *Terremoto*, *Tócame*, *Tu Y Yo*, and *Veneno* (collectively, the "Anitta Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

307. Each of the Anitta Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

308. A comparison of *Fish Market* and each of the Anitta Works establishes that each of the Anitta Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Anuel AA Allegations

309. As shown in the accompanying Exhibit A, Anuel AA and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *3 Some*, *Amanece*, *Armaos 100PRE Andamos*, *Así Soy Yo*, *Ayer*, *Ayer 2*, *Bandido*, *Bandolera*, *Ceniza En Cenicero*, *China*, *Cristiniando*, *Demonia*, *El Manual*, *El Problema*, *Ella Quiere Beber*, *Espina*, *Fútbol y Rumba*, *Hasta Que Dios Diga*, *Hipócrita*, *Jangueo*, *Keii*, *La Bella Y La Bestia*, *Nacimos Pa Morir*, *Naturaleza*, *No Love*, *Nunca Amare*, *Pensando En Tí*, *Que Se Joda*, *Reggaetonera*, *Secreto*, *Sola Remix*, *Sola*, *Street Poem*, *Súbelo*, *Te Necesito*, *Tentandome*, and *Tocándote*.

310. Each of *3 Some*, *Amanece*, *Armaos 100PRE Andamos*, *Así Soy Yo*, *Ayer*, *Ayer 2*, *Bandido*, *Bandolera*, *Ceniza En Cenicero*, *China*, *Cristiniando*, *Demonia*, *El Manual*, *El Problema*, *Ella Quiere Beber*, *Espina*, *Fútbol y Rumba*, *Hasta Que Dios Diga*, *Hipócrita*, *Jangueo*, *Keii*, *La Bella Y La Bestia*, *Nacimos Pa Morir*, *Naturaleza*, *No Love*, *Pensando En Tí*, *Que Se Joda*, *Reggaetonera*, *Secreto*, *Sola Remix*, *Sola*, *Street Poem*, *Súbelo*, *Te Necesito*, and *Tocándote* (collectively, the "Anuel AA Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

311. Specifically, *Amanece* incorporates a sample taken directly from *Pounder* and, by extension, *Fish Market*. The sample is introduced at approximately 0:36 and is looped at various other intervals throughout *Amanece*. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Amanece*. Additionally, the drum tracks in *Amanece* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Amanece* is the same as *Fish Market*. The synth tom in *Amanece* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on

beats 1 and 3 of every bar. Further, *Amanece* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Amanece* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

312. Specifically, *Así Soy Yo* features a truncated sample taken directly from *Pounder* and, by extension, *Fish Market*. The sample is played at approximately 1:06-1:16. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Así Soy Yo*. Additionally, the Bb or B flat key in *Así Soy Yo* is the same as *Fish Market* and *Pounder*. The bass line played in *Así Soy Yo* is a minimalistic pattern as found in *Fish Market* having emphasis placed on beats 1 and 3 of each bar anchoring on a B flat note. The timbre of the bass in *Así Soy Yo* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

313. Specifically, *Ayer* incorporates a sample taken directly from *Pounder* and, by extension, *Fish Market*. The sample is played at approximately 0:41 and is introduced at various other intervals throughout *Ayer*. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Ayer*. Additionally, the drum tracks in *Ayer* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Ayer* is the same as *Fish Market* including the addition of a truncated *Fish Market* intro drum roll on beat 3 of bar 2 and on the second bar of the 2 bars pattern. Additionally, *Ayer* copies both the location and the tambourine pattern in the second bar of the 2 bars pattern in *Fish Market*. The synth tom in *Ayer* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Ayer* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Ayer* has the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

314. Specifically, *Ayer 2* copies the fundamental pattern from *Fish Market.* However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Ayer 2*. Additionally, the drum tracks in *Ayer 2* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Ayer 2* is the same as the snare pattern in *Fish Market* and *Pounder* and also incorporates a segment of the timable pattern which when combined serves to complete the full drum pattern contained within the *Fish Market.* The synth tom in *Ayer 2* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, the bass line played in *Ayer 2* is a minimalistic pattern as found in *Fish Market* having emphasis placed on beats 1 and 3 of each bar. The timbre of the bass in *Ayer 2* has the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

315. Specifically, *Bandolera* copies the fundamental pattern from *Fish Market.* However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Bandolera*. The drum tracks in *Bandolera* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Bandolera* is the same as *Fish Market*. The synth tom in *Bandolera* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, the bass line played in *Bandolera* is a minimalistic pattern as found in *Fish Market* having emphasis placed on beats 1 and 3. The timbre of the bass in *Bandolera* has the same sub frequency sound spectrum range as in *Fish Market.*

316. Specifically, *Demonia* incorporates a sample taken directly from *Pounder* and, by extension, *Fish Market.* The sample is introduced at approximately 0:23 and islooped at various other intervals throughout *Demonia*. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is

maintained and remains dominant throughout *Demonia*. Additionally, the drum tracks in *Demonia* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Demonia* is the same as *Fish Market.* The synth tom in *Demonia* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. The timbale pattern in *Demonia* is the same as *Fish Market.* Further, *Demonia* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Demonia* has the same sub frequency sound spectrum range as in *Fish Market* and *Pounder.*

317. Specifically, *Keii* incorporates a sample taken directly from *Pounder* and, by extension, *Fish Market.* The sample is played at approximately 0:46-1:07, 1:29-1:51, 2:02-2:13 and 2:56-3:18. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Keii*. Additionally, the drum tracks in *Keii* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Keii* is the same as *Fish Market.* The synth tom in *Keii* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. The timbale pattern in *Keii* is the same as *Fish Market.* Further, *Keii* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Keii* has the same sub frequency sound spectrum range as in *Fish Market* and *Pounder.*

318. Specifically, *Nacimos Pa Morir* incorporates a sample taken directly from *Pounder* and, by extension, *Fish Market.* The sample is played at approximately 0:42-1:02, 1:14-1:34, 2:18-2:59 and 3:22-3:42. The 2 bars sample originated from *Pounder*. Additionally, the drum tracks in *Nacimos Pa Morir* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Nacimos Pa*

Morir is the same as *Fish Market.* The synth tom in *Nacimos Pa Morir* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. The timbale pattern in *Nacimos Pa Morir* is the same as *Fish Market.* Further, *Nacimos Pa Morir* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Nacimos Pa Morir* has the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

319. Specifically, *No Love* incorporates a sample taken directly from *Pounder* and, by extension, *Fish Market.* The sample is played at approximately 0:27-0:37, 0:38-2:39, 2:51-2:59, 3:13-3:21 and 3:24-4:07. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *No Love*. Additionally, the drum tracks in *No Love* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *No Love* is the same as *Fish Market.* The synth tom in *No Love* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. *No Love* contains the same timbale pattern as *Fish Market.* Further, *No Love* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *No Love* has the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

320. Specifically, *Nunca Amare* incorporates elements of the *Fish Market* pattern beginning at approximately 0:35-0:56, 1:00-1:19, 1:30-1:51 and 2:13-2:57. Additionally, the drum tracks in *Nunca Amare* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Nunca Amare* copies the fundamental snare drum pattern in *Fish Market.* The synth tom in *Nunca Amare* copies the pattern of the synth tom in *Fish Market* played on beats 1 and 3 of every bar. *Nunca Amare* contains a drum loop that mimics the timbale roll played in *Fish*

Market. Further, *Nunca Amare* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Nunca Amare* has the same sub frequency sound spectrum range as in *Fish Market* and *Pounder.*

321. Specifically, *Reggaetonera* incorporates a sample taken directly from *Pounder* and, by extension, *Fish Market.* The sample is introduced at approximately 0:31 and is looped at various other intervals throughout *Reggaetonera*. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Reggaetonera*. Additionally, the drum tracks in *Reggaetonera* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Reggaetonera* is the same as *Fish Market.* The synth tom in *Reggaetonera* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. The timbale pattern in *Reggaetonera* copies the timbale pattern from *Pounder* and *Fish Market.* Further, *Reggaetonera* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Reggaetonera* has the same sub frequency sound spectrum range as in *Fish Market* and *Pounder.*

322. Specifically, *Tentandome* incorporates a sample taken directly from *Pounder* and, by extension, *Fish Market.* The sample is introduced at approximately 0:32 and is looped at various other intervals throughout *Tentandome*. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Tentandome*. Additionally, the drum tracks in *Tentandome* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Tentandome* is the same as *Fish Market.* The synth tom in *Tentandome* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. *Tentandome* copies the timbale pattern from

Pounder and *Fish Market*. Further, *Tentandome* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Tentandome* has the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

323. Each of the Anuel AA Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

324. A comparison of *Fish Market* and each of the Anuel AA Works establishes that each of the Anuel AA Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Anuel AA & Ozuna Allegations

325. As shown in the accompanying exhibit, Anuel AA & Ozuna and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *100*, *Antes*, *DIME TÚ*, *Nena Buena*, *Nunca*, and *Perreo*.

326. Each of *100*, *Antes*, *DIME TÚ*, *Nena Buena*, *Nunca*, and *Perreo* (collectively, the "Anuel AA & Ozuna Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

327. Each of the Anuel AA & Ozuna Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

328. A comparison of *Fish Market* and each of the Anuel AA & Ozuna Works establishes that each of the Anuel AA & Ozuna Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and

composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Bad Bunny Allegations

329. As shown in the accompanying Exhibit A, Bad Bunny and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *A Tu Merced*, *BAD CON NICKY*, *Bellacoso*, *Bichiyal*, *BYE ME FUI*, *Callaíta*, *CANCIÓN CON YANDEL*, *CÓMO SE SIENTE (Remix)*, *Cuando Perriabas*, *Efecto*, *Ignorantes*, *LA CANCIÓN*, *La Corriente*, *La Difícil*, *La Noche de Anoche*, *La Romana*, *La Santa*, *La Zona*, *MÁS DE UNA CITA*, *Me Porto Bonito*, *Mia*, *Moscow Mule*, *Ojitos Lindos*, *PA' ROMPERLA*, *Party*, *Que Malo*, *Safaera*, *Si Estuviésemos Juntos*, *Soliá*, *Solo De Mi*, *Tarot*, *Tití Me Preguntó*, *Un Ratito*, *Una Vez*, *VETE*, *Yo Perreo Sola*, and *Yonaguni*.

330. Each of *A Tu Merced*, *BAD CON NICKY*, *Bellacoso*, *Bichiyal*, *BYE ME FUI*, *Callaíta*, *CANCIÓN CON YANDEL*, *CÓMO SE SIENTE (Remix)*, *Cuando Perriabas*, *Efecto*, *Ignorantes*, *LA CANCIÓN*, *La Corriente*, *La Difícil*, *La Noche de Anoche*, *La Romana*, *La Santa*, *La Zona*, *MÁS DE UNA CITA*, *Me Porto Bonito*, *Mia*, *Moscow Mule*, *Ojitos Lindos*, *PA' ROMPERLA*, *Party*, *Que Malo*, *Safaera*, *Si Estuviésemos Juntos*, *Soliá*, *Solo De Mi*, *Tarot*, *Tití Me Preguntó*, *Un Ratito*, *Una Vez*, *VETE*, *Yo Perreo Sola*, and *Yonaguni* (collectively, the "Bad Bunny Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

331. Specifically, *A Tu Merced* copies elements of the *Fish Market* drum and bass patterns throughout most of the work. The drum tracks in *A Tu Merced* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *A Tu Merced* copies elements of the snare drum pattern played in *Fish Market*, but leaves out certain elements that it instead copies using maracas rather than a snare

drum. This fills in the beats that are missing from the *A Tu Merced* snare drum pattern, resulting in the same pattern as *Fish Market.* Further, the bass line played in *A Tu Merced,* is a minimalistic pattern as performed in *Fish Market* and gives emphasis on beats one and three while utilizing the same smooth sub frequency timbre.

332. Specifically, *Callaita* copies elements of the *Fish Market* drum and bass patterns through most of the work beginning at 0:35 seconds into *Callaita.* The drum tracks in *Callaita* feature the same kick drum patterns to those in *Fish Market* with each play four crotchets per bar beginning on the first beat of each bar. The four crotchets per bar played on the hi-hat in *Fish Market* is substituted by a vocal sample applied on the Fish Market hi-hat beats being four crotchets per bar beginning on the first beat of each bar. This is heard at various locations throughout the work and on all the choruses in *Callaita* beginning at 0:35-0:56. The snare drum in *Callaita* copies elements of the snare drum pattern played in *Fish Market.* The bass line played on *Callaita,* is a minimalistic pattern as performed in *Fish Market* and gives emphasis on beats one and three while utilizing the same smooth sub frequency timbre.

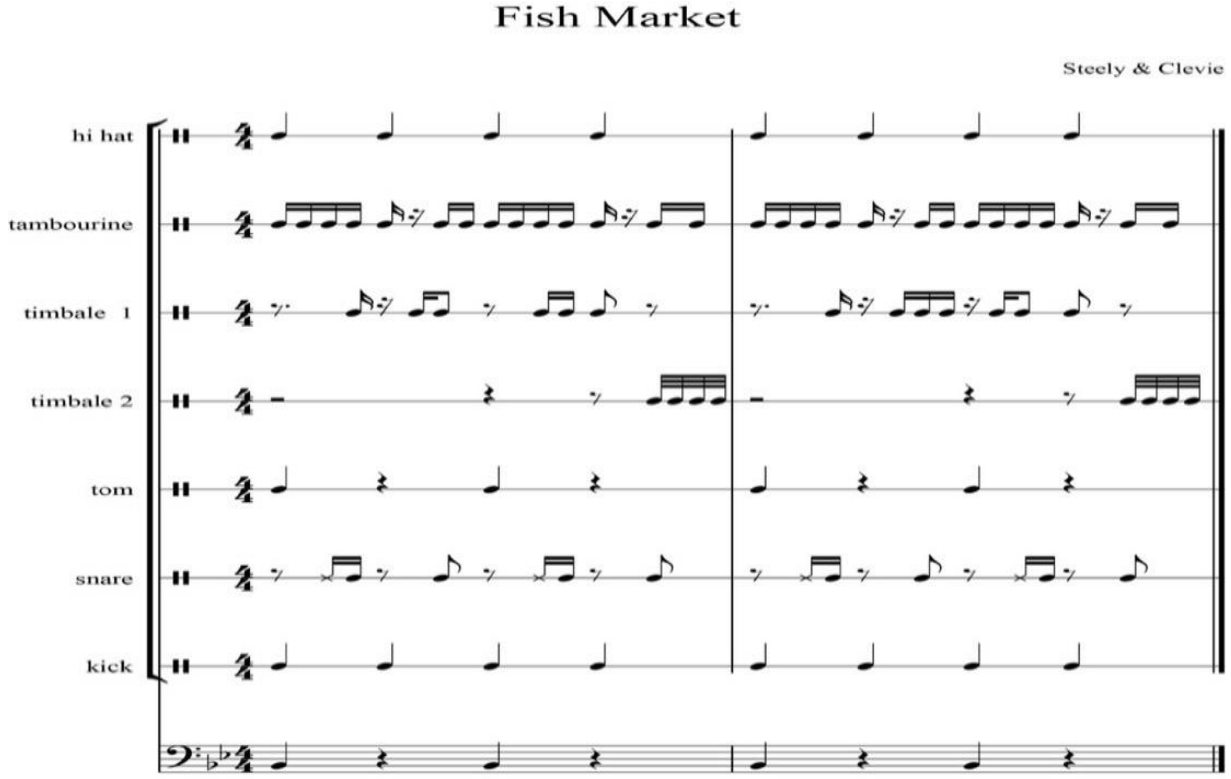
333. Specifically, *Cuando Perriabas* copies elements of the *Fish Market* drum and bass patterns throughout most of the work. Further, a truncated audio sample taken from *Pounder* can be heard at 1:34 and opens up to the full sample at 1:39-1:45 and again at 2:44 through the end of the work. The sample has been temp manipulated, being slowed down from approximately 100 BPM in *Pounder/Fish Market* to approximately 82 BPM in *Cuando Perriabas.* The sample remains clearly identifiable. Further, the bass line played in *Cuando Perriabas,* is a minimalistic pattern as performed in *Fish Market* and gives emphasis on beats one and three while utilizing the same smooth sub frequency timbre.

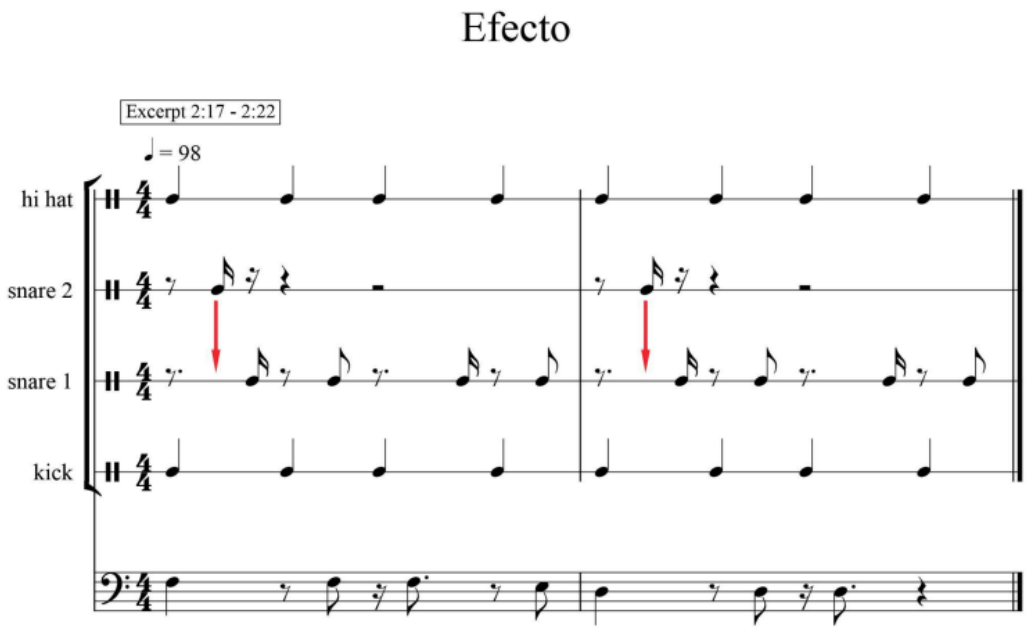
334. Specifically, *La Dificil* copies the *Fish Market* drum and bass patterns throughout most of the work and can be heard beginning at approximately 0:45-0:55,

again at 1:07-2:00 and interspersed throughout the rest of the work. There are edits, breaks and slight rhythmic deviations in between both locations. However, the fundamental pattern in *Fish Market* is maintained throughout. The drum sounds may have been taken from samples derived from the *Pounder* recording. The drum tracks in *La Dificil* feature similar kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *La Dificil* copies the snare drum pattern played in *Fish Market.* The synth tom in *La Dificil* plays the same pattern on beats 1 and 3 as in *Fish Market.* Further, the bass line played in *La Dificil*, is a minimalistic pattern as performed in *Fish Market* and gives emphasis on beats one and three while utilizing the same smooth sub frequency timbre.

335. Specifically, *La Corriente* copies elements of the *Fish Market* drum and bass patterns throughout most of the work and includes an audio sample taken from *Pounder* at approzimately 1:18-1:23. Both tempos are the same with a miniscule difference between both works. *La Corriente* is approximately 98 BPM as opposed to Fish market at approximately 100 BPM. This 2 BMP difference does not impact or change the rhythmic similarities. The drum tracks in *La Corriente* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *A Tu Merced* copies the snare drum pattern played in *Fish Market.* This pattern is more complete and evident at the point of introduction of the *Pounder* sample at 1:18-1:23. This sample infringes the master recording from which the sample was derived as well as the *Fish Market* composition; which includes the timbales, synth tom, kick, snare, hi-hat and bass patterns also embedded within the sample. Further, the bass line played in *A Tu Merced*, is a minimalistic pattern as performed in *Fish Market* and gives emphasis on beats one and three while utilizing the same smooth sub frequency timbre.

336. Specifically, *Efecto* copies the *Fish Market* drum and bass patterns throughout most of the work. The copied pattern can be heard at approximately 0:19-0:37, 0:39-1:26 and intermittently throughout the rest of the song. Both tempos are the same with a miniscule difference between both works. *Efecto* is approximately 98 BPM as opposed to *Fish Market* at approximately 100 BPM. This 2 BMP difference does not impact or change the rhythmic similarities. The drum tracks in *Efecto* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The combined snare drum patterns copy the snare drum pattern played in *Fish Market*, featuring a third 16th note in each bar as played in the *Fish Market* snare pattern. This is more clearly defined at 2:17-2:22, where the additional snare beat can be heard, thus completing the *Fish Market* snare drum pattern. (See red arrows pointers on notation indicating location of additional snare beat). Further, the bass line played in *Efecto*, is a minimalistic pattern as performed in *Fish Market* and gives emphasis on beats one and three while utilizing the same smooth sub frequency timbre.

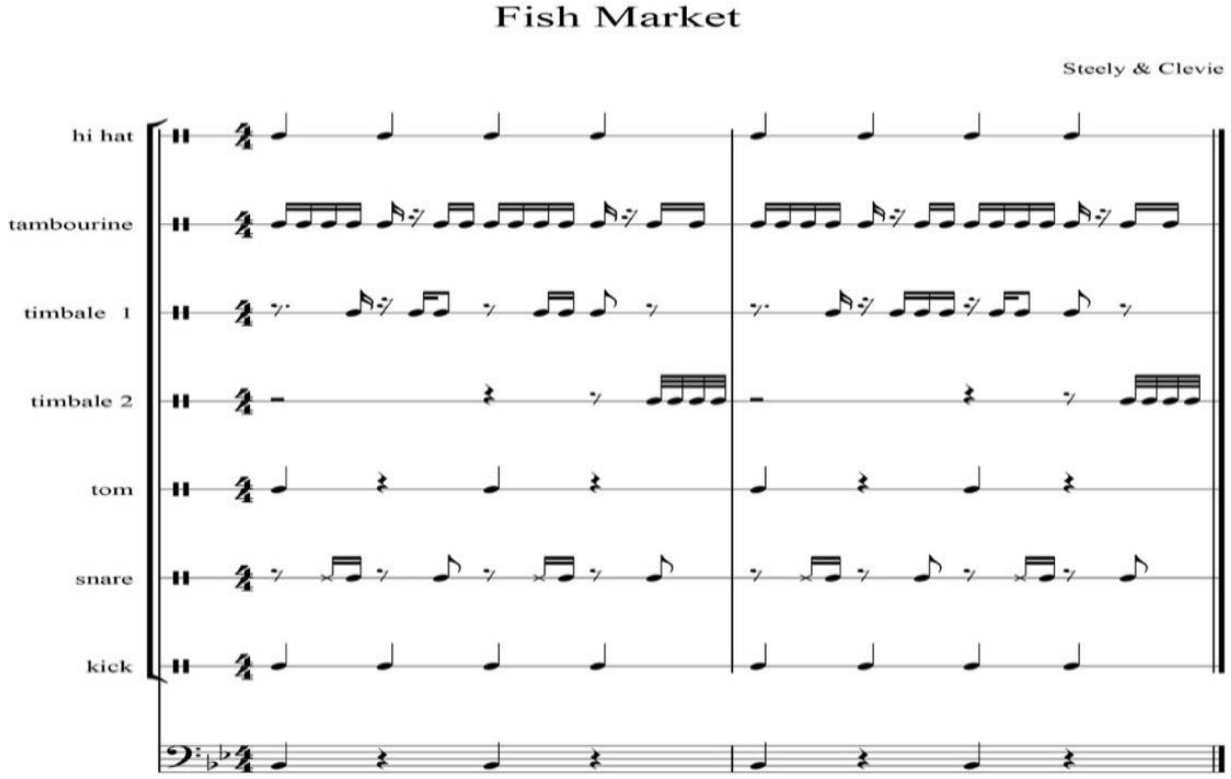


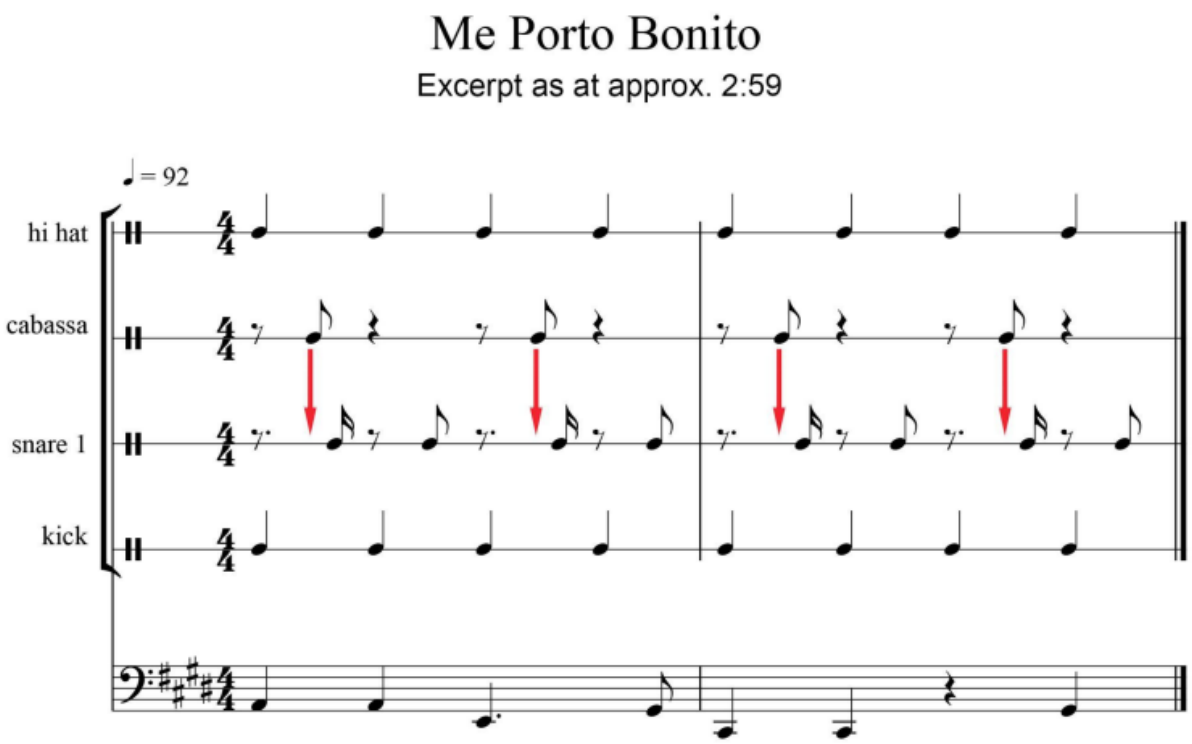


337. Specifically, *La Zona* copies the *Fish Market* drum and bass patterns throughout most of the work. Elements of *Fish Market* can be heard at approximately 1:13 in *La Zona*, which introduces the timbale roll from *Fish Market* at the end of bar 2 of the pattern. The *Fish Market* pattern is interspersed throughout the rest of the work manipulated in the mix with audio filters, breaks, and edits. However, the fundamental pattern in *Fish Market* is maintained throughout. The drum sounds are the same to those contained in *Pounder* and may have been sampled from that recording or derived from manipulation of audio from the same *Pounder* recording. The drum tracks in *La Zona* feature the same kick drum and hi-hat patterns to those in Fish Market with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *La Zona* copies the snare drum pattern played in *Fish Market*. The synth tom in *La Zona* also plays the same pattern on beats 1 and 3 as in *Fish Market.* Further, the bass line played in *La Zona*, is a minimalistic pattern

as performed in *Fish Market* and gives emphasis on beats one and three while utilizing the same smooth sub frequency timbre.

338. Specifically, *Me Porto Bonito* copies the *Fish Market* drum and bass patterns throughout most of the work. The copied pattern can be heard more clearly starting at approximately 2:59-3:04 where there is no disruptive vocal overlay. However, the pattern can also be heard at 0:32-0:41, 0:43-1:53 leading to an audio sample at 1:54 which is taken from either the *Fish Market* or *Pounder* introduction drum roll. The drum tracks in *Me Porto Bonito* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The combined snare drum and cabasa patterns found in *Me Porto Bonito* copy the snare drum pattern played in *Fish Market*, with the cabasa replacing the third 16th note of each bar as played in the *Fish Market* snare pattern. (See red arrows in the notation below). Further, the bass line played in *Me Porto Bonito*, is a minimalistic pattern as is the bass line in *Fish Market* and utilizes the same smooth sub frequency timbre.

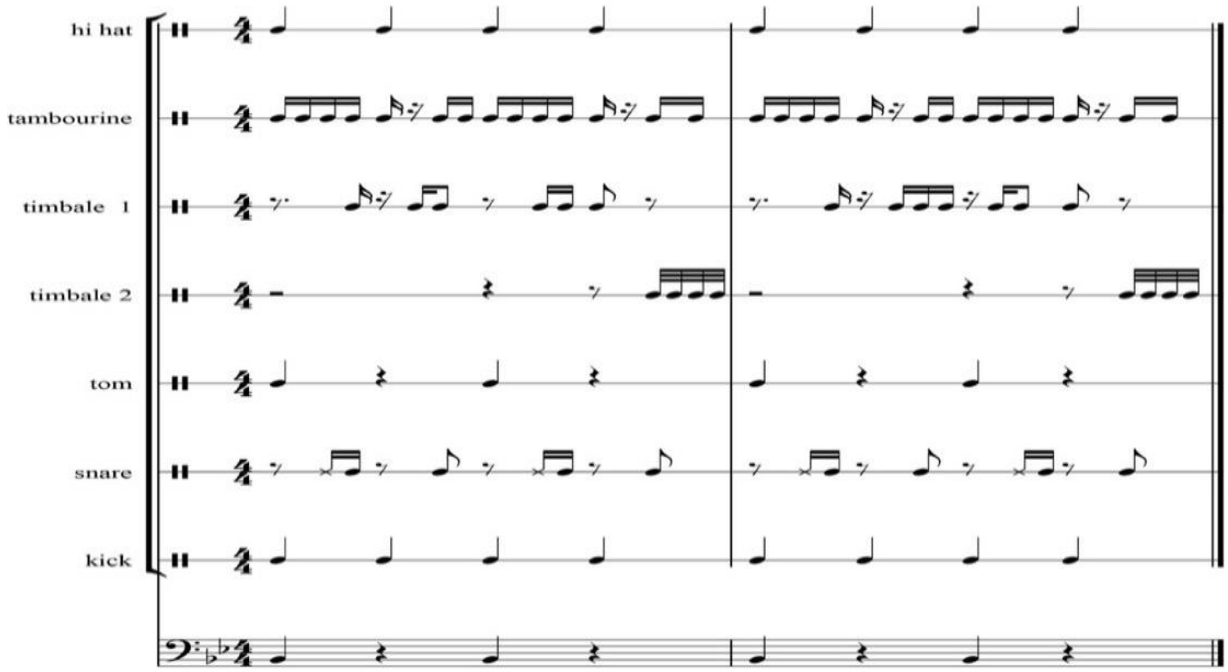




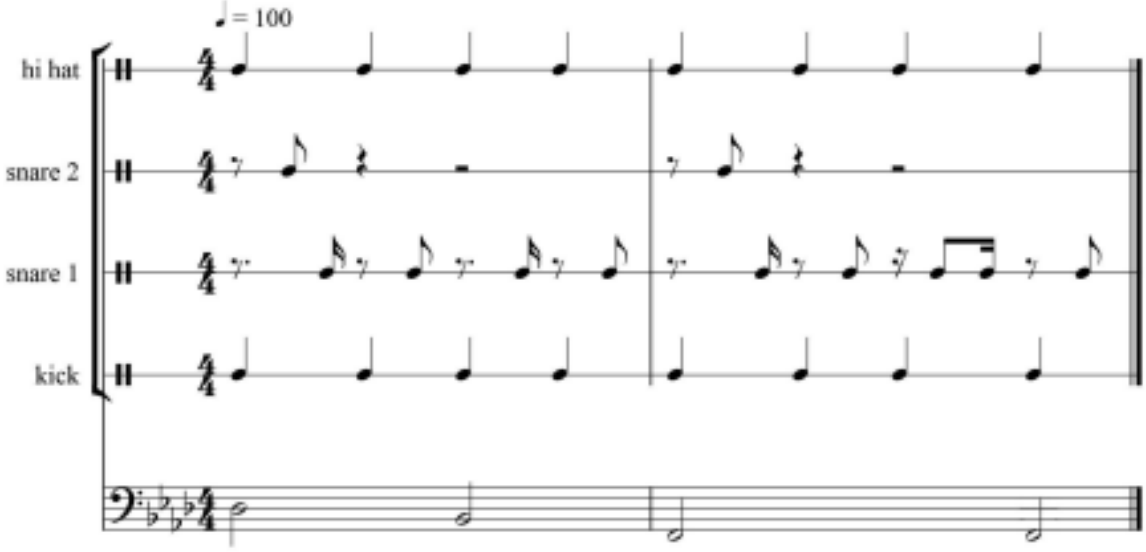
339. Specifically, *Moscow Mule* copies the *Fish Market* drum and bass patterns throughout most of the work while maintaining the same tempo at approximately 100 BPM. The copied pattern can be heard more distinctly starting at approximately 0:53-0:57 and is the predominant pattern played throughout the work. The drum tracks in *Moscow Mule* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The combined snare drum pattern in *Moscow Mule* copies the snare drum pattern in *Fish Market*. The synth tom in *Moscow Mule* is played on beats one and three as in *Fish Market*. Further, the bass line found in *Moscow Mule*, copies the minimalist pattern of the bass in *Fish Market* being on beats one and three. The track also copies the timbre of sounds played in *Fish Market* and *Pounder*.

Fish Market

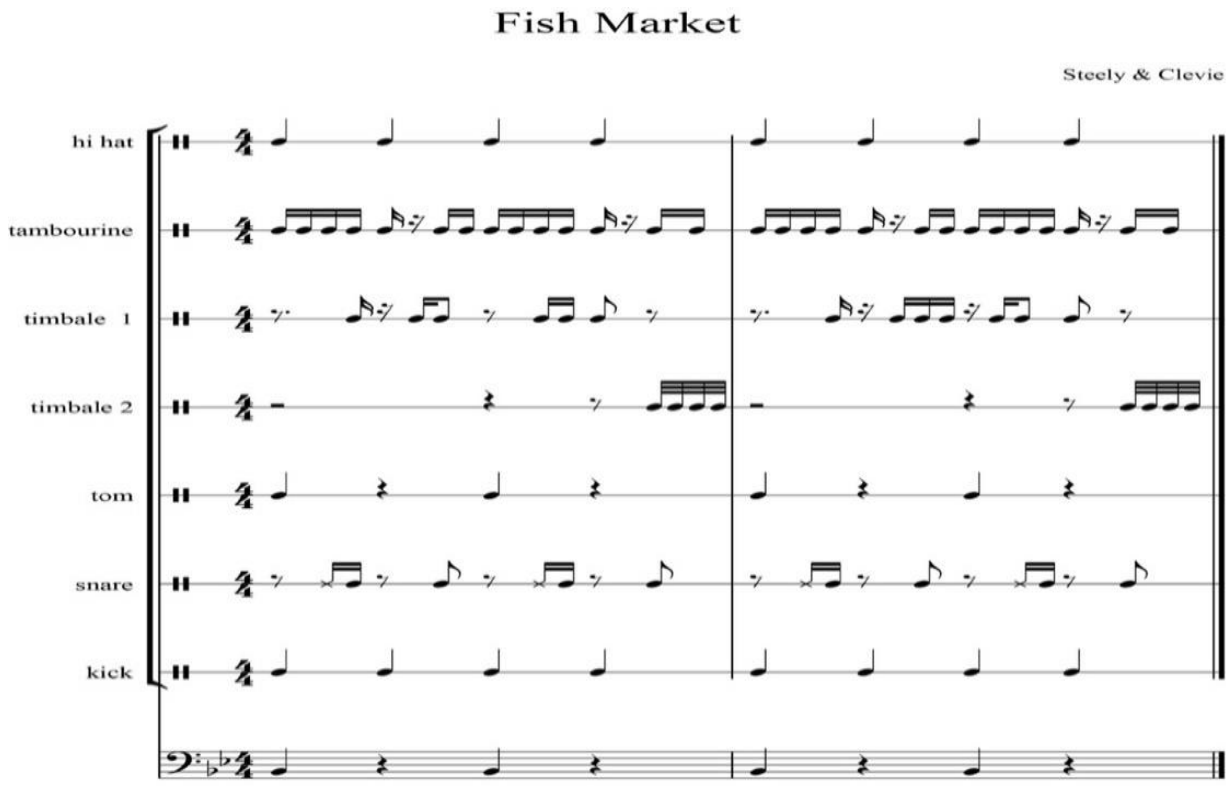
Steely & Clevie

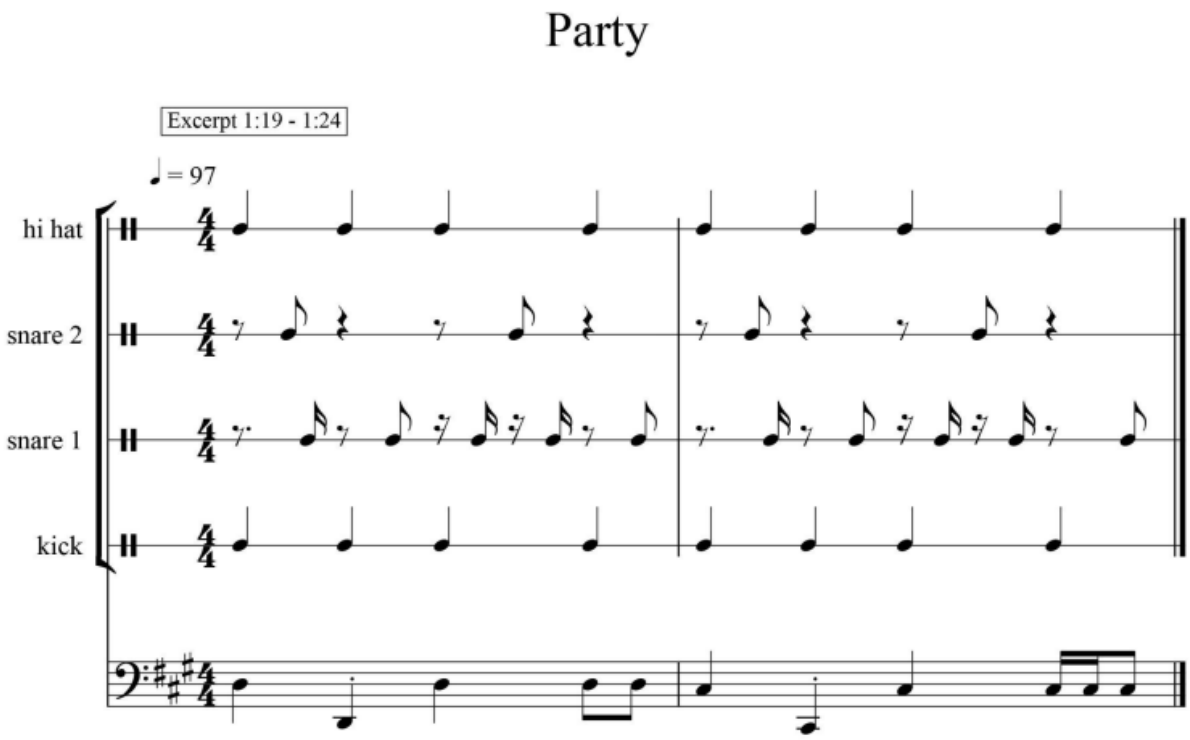


Moscow Mule



340. Specifically, *Party* copies the *Fish Market* drum and bass patterns throughout most of the work. The copied pattern can be heard more distinctly starting at approximately 0:29-0:48, 1:19-1:25 and is the predominant pattern played throughout the work. The drum tracks in *Party* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The combined snare drum pattern in *Party* copies the snare drum pattern in *Fish Market.* The synth tom in *Party* is played on beats one and three as in *Fish Market.* A sample if *Pounder* also appears in *Party* beginning at 0:29 and at various other locations throughout the work. Further, the bass line played in *Party*, copies the minimalistic pattern of the bass in *Fish Market.*





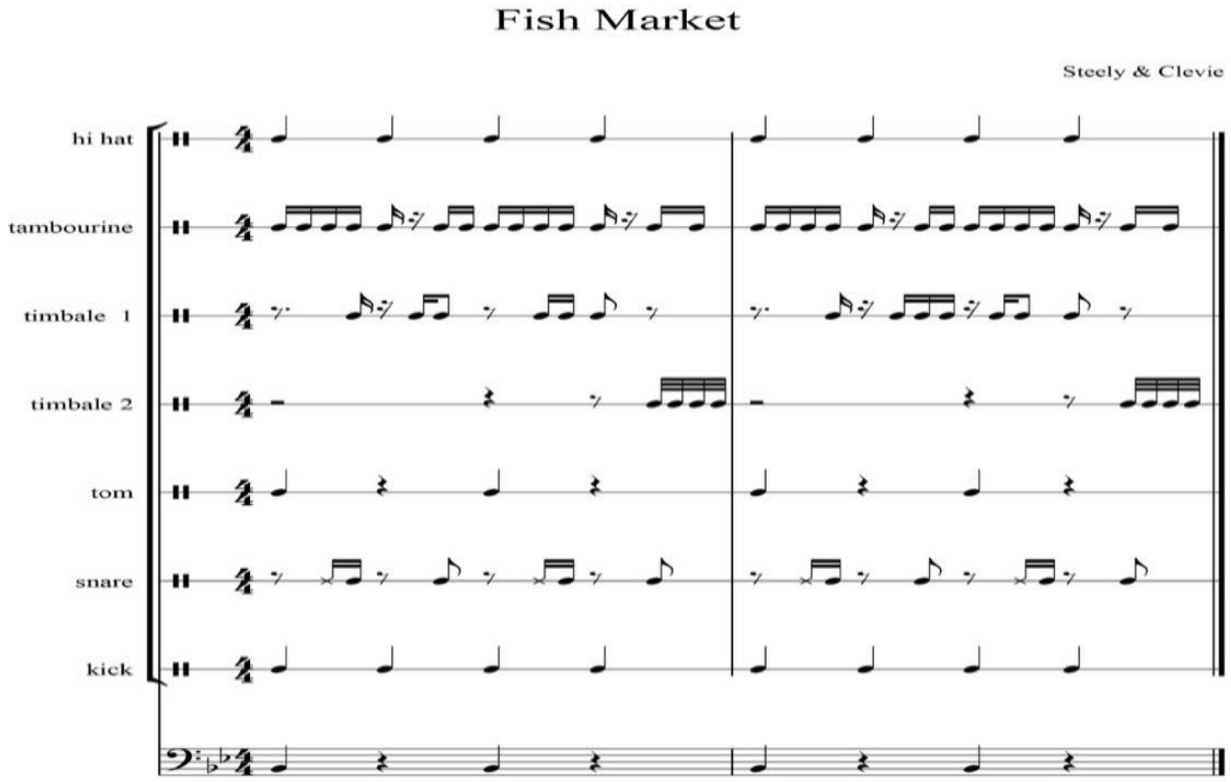
341. Specifically, *Ojitos Lindos* copies the *Fish Market* drum and bass patterns throughout most of the work. The copied pattern can be heard more distinctly starting at approximately 0:36-0:59, 1:12-1:35 and is the predominant pattern played throughout the work. The drum tracks in *Ojitos Lindos* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The combined snare drum pattern in *Ojitos Lindos* copies the snare drum pattern in *Fish Market.* Additional percussive loop elements added halfway through the choruses at approximately 0:48-0:59, combine with the existing patterns to create the tambourine pattern contained in *Fish Market.* The synth tom in *Ojitos Lindos* is played on beats one and three as in *Fish Market.* Further, the bass line played in *Ojitos Lindos,* copies the minimalistic pattern of the bass in *Fish Market* on beats one and three. The track also copies the timbre of the bass as played in *Fish Market* and *Pounder*.

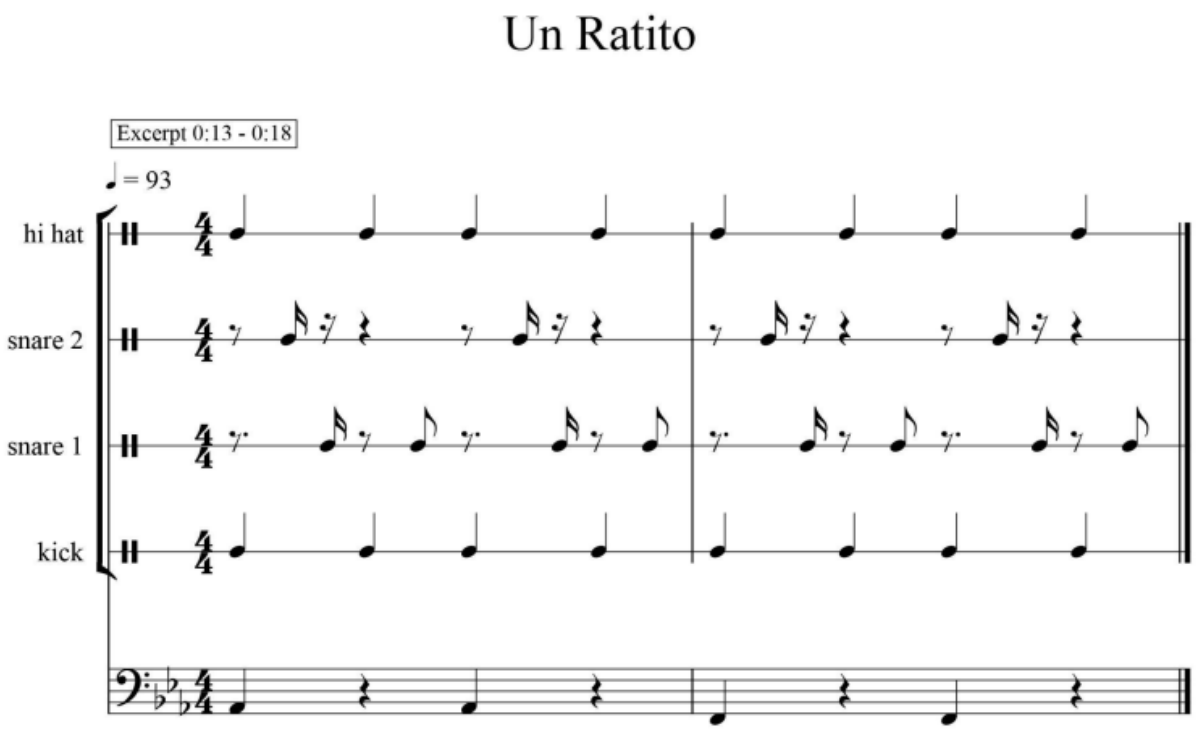
342. Specifically, *Si Estuviesemos Juntos* copies elements of the *Fish Market* drum and bass patterns throughout most of the work. The *Fish Market* pattern is interspersed throughout the work manipulated in the mix with audio filters, breaks, and edits. However, the fundamental pattern in *Fish Market* is maintained throughout. The drum tracks in *Si Estuviesemos Juntos* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern copies the pattern played in *Fish* Market, which in combination with the hi-hat and the high-pitched percussion element played in *Si Estuviesemos Juntos*, replicates the tambourine pattern in *Fish Market.* Despite the tambourine pattern's beats distribution being placed among different percussive elements in *Si Estuviesemos Juntos*, the combined rhythmic outcome is the same as the tambourine pattern in *Fish Market. Si Estuviesemos Juntos* includes a timbale roll contained in the pattern loop which is the same to the roll in *Fish Market.* The synth tom in *Si Estuviesemos Juntos* is played on beats one and three as in *Fish Market.* Further, the bass line played in *Si Estuviesemos Juntos*, is a minimalistic pattern as found in *Fish Market* having emphasis placed on beats one and three while utilizing the same smooth sub frequency timbre.

343. Specifically, *Solo De Mi* copies elements of the *Fish Market* drum and bass patterns throughout most of the work. The *Fish Market* pattern is interspersed through the work manipulated in the mix with breaks and edits. This track features less instruments when compared to *Fish Market.* However, the fundamental pattern in *Fish Market* is predominant throughout the work. The drum tracks in *Solo De Mi* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Solo De Mi* copies the snare drum pattern in *Fish Market.* Further, the bass line played in *Solo De Mi* is a minimalistic pattern as performed in *Fish Market*

having emphasis placed on beats 1 and 3 while utilizing the same smooth sub frequency timbre.

344. Specifically, *Un Ratito* copies the *Fish Market* drum and bass patterns throughout most of the work with the exclusion of the timbales and tambourine. This can be heard more distinctly at approximately 1:13-1:18, 1:34-1:43 and 1:54-2:02. The drum tracks in *Un Ratito* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The combined snare drum pattern in *Un Ratito* copies the snare drum pattern in *Fish Market.* The synth tom in *Un Ratito* is played on beats one and three as in *Fish Market.* Further, the bass line played in *Un Ratito,* copies the minimalistic pattern of the bass in *Fish Market* on beats one and three. The track also copies the timbre of the bass as played in *Fish Market* and *Pounder*.





345. Specifically, *Yo Perreo Sola* copies elements of the *Fish Market* drum and bass patterns throughout most of the work. The *Fish Market* pattern is interspersed throughout the work manipulated in the mix with breaks and edits. However, the fundamental pattern in *Fish Market* is predominant throughout the work. The drum tracks in *Yo Perreo Sola* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Yo Perreo Sola* copies the snare drum pattern in *Fish Market.* The synth tom in *Yo Perreo Sola* is played on beats one and three as in *Fish Market.* Further, the bass line played in *Yo Perreo Sola* is a minimalistic pattern as performed in *Fish Market.* However, beats 2 and 4 are added to the 1 and 2 pattern in *Fish Market.* The same sub frequency timbre is used on the bass as with *Fish Market.*

346. Specifically, *Yonaguni* copies elements of the *Fish Market* drum and bass patterns throughout most of the work. The *Fish Market* pattern is interspersed

throughout the work manipulated in the mix with breaks and edits. However, the fundamental pattern in *Fish Market* is predominant throughout the work. The drum tracks in *Yonaguni* features the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Yonaguni* copies the snare drum pattern in *Fish Market.* However, the pattern is augmented with a kick drum playing the same snare pattern. Further, the bass line played in *Yonaguni* is a minimalistic pattern. Half of the work features the same bass pattern to *Fish Market* with emphasis placed on beats 1 and 3. The other bass pattern puts emphasis on a combination of the snare and kick patterns. The same sub frequency timbre is used on the bass as with *Fish Market*

347. Specifically, *La Romana* copies elements of the *Fish Market* drum and bass patterns throughout most of the work. The *Fish Market* pattern is interspersed throughout the work manipulated in the mix with breaks and edits. However, the fundamental pattern in *Fish Market* is predominant throughout the work. The drum tracks in *La Romana* feature the same kick drum patterns to that in *Fish Market* playing four crotchets per bar beginning on the first beat of each bar. There is no hi-hat played in this work, however, the hi-hat pattern in *Fish Market* is played on the kick drum in this work being four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *La Romana* copies the snare drum pattern in *Fish Market.* Further, the bass line played in *La Romana* is a minimalistic pattern with emphasis on beats 1 and 3. The same sub frequency timbre is used on the bass as with *Fish Market.*

348. Specifically, *La Santa* copies elements of the *Fish Market* drum and bass patterns throughout most of the work. The *Fish Market* pattern is interspersed throughout the work manipulated in the mix with breaks and edits. However, the fundamental pattern in *Fish Market* is predominant throughout the work. The drum tracks in *La Santa* feature the same kick drum and hi-hat patterns to those in *Fish*

Market with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *La Santa* copies the snare drum pattern in *Fish Market.*

349. Specifically, *PA' ROMPERLA* copies elements of the *Fish Market* drum and bass patterns throughout most of the work. The *Fish Market* pattern is interspersed throughout the work manipulated in the mix with audio filters, breaks, and edits. However, the fundamental pattern in *Fish Market* is maintained throughout. The track incorporates a variety of drum loops developed from *Fish Market* and *Pounder*. The drum tracks in *PA' ROMPERLA* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *PA' ROMPERLA* copies the pattern played in *Fish Market.* The synth tom in *PA' ROMPERLA* is played on beats one and three as in *Fish Market.* Further, the bass line played in *PA' ROMPERLA*, is a minimalistic pattern as found in *Fish Market.* The key is transposed 3 steps down, from B flat to G, but maintains the same single note pattern placed on beats 1 and 3 of each bar as in *Fish Market. PA' ROMPERLA* has the same sub frequency timbre as used for the bass as in *Fish Market.*

350. Specifically, *CÓMO SE SIENTE (Remix)* copies elements of the *Fish Market* drum and bass patterns throughout most of the work manipulated in the mix with occasional beat pauses and frequency filtering. However, the fundamental pattern in *Fish Market* is maintained throughout. The track incorporates a variety of drum loops developed from *Fish Market* and *Pounder*. The drum tracks in *CÓMO SE SIENTE (Remix)* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *CÓMO SE SIENTE (Remix)* copies the pattern played in *Fish* Market. Further, the bass line played in *CÓMO SE SIENTE (Remix)* is a minimalistic pattern as found in *Fish Market.* The bass pattern maintains the same

rhythmic pattern with emphasis placed on beats 1 and 3 of each bar. *CÓMO SE SIENTE (Remix)* has the same sub frequency timbre as used for the bass as in *Fish Market*.

351. Specifically, *Safaera* copies elements of the *Fish Market* drum and bass patterns throughout most of the work. *Safaera* is sample driven containing audio excerpts from *Pounder* and a variety of other well-known works. However, the fundamental pattern in *Fish Market* is maintained and is predominant throughout the work. At about 0:58 in the work, all elements of *Fish Market* are introduced. Samples from *Pounder can be heard at 1:19-1:28, 3:26-3:30, 3:51-3:56 and 4:13-4:35.*

352. Specifically, *Una Vez* copies elements of the *Fish Market* drum and bass patterns interspersed throughout the work. The fundamental pattern in *Fish Market* is maintained throughout. The drum tracks in *Una Vez* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Una Vez* copies the pattern played in *Fish Market.* The synth tom in *Una Vez* copies the sound and pattern of the synth tom in *Pounder* and *Fish Market* played on beats 1 and 3 of every bar. Further, the bass line played in *Una Vez* is a minimalistic pattern. However, emphasis is placed on all four beats of the bars adding to the beats 1 and 3 as in *Fish Market.* The bass in *Una Vez* maintains the tonal texture of *Fish Market* with smooth deep bass timbre.

353. Specifically, *BAD CON NICKY* is a sample driven track incorporating the *Pounder* sample at 1:53-2:06 and again at 2:25-3:02. The rest of the track copies elements of the *Fish Market* drum and bass patterns throughout the work. The use of the *Pounder* sample in *BAD CON NICKY* encapsulates all the drum and bass elements contained in *Fish Market.* The bass line in *BAD CON NICKY* is a minimalistic pattern with emphasis placed on beats 1 and 3 of each bar as in *Fish Market.* The *Fish Market* key of B flat is maintained in *BAD CON NICKY.* The bass

in *BAD CON NICKY* maintains the tonal texture of *Fish Market* with a smooth deep bass timbre.

354. Specifically, *Que Malo* copies elements of the *Fish Market* drum and bass patterns throughout the work. The track is manipulated by edits to include breaks, frequency filtering, and loop/sound changes. Nevertheless, the fundamental pattern in *Fish Market* is maintained throughout. The drum tracks in *Que Malo* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Que Malo* copies the pattern played in *Fish Market.* The synth tom in *Que Malo* copies the sound and pattern of the synth tom in *Pounder* and *Fish Market* played on beats 1 and 3 of every bar. Further, the bass line played in *Que Malo* is a minimalistic pattern with emphasis placed on beats 1 and 3 as in *Fish Market.* The bass in *Una Vez* maintains the tonal texture of *Fish Market* with smooth deep bass timbre.

355. Specifically, *La Noche De Anoche* copies elements of the *Fish Market* drum and bass patterns throughout the work. The drum tracks in *La Noche De Anoche* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *La Noche De Anoche* copies the pattern played in *Fish Market.* However, the second 8th beat played on the snare drum in *Fish Market* is substituted in *La Noche De Anoche* with a maracas or other similar high pitched percussion sound. Further, the bass line played in *La Noche De Anoche* is a minimalistic pattern with emphasis is placed on beats 1 and 3 as in *Fish Market.* The same sub frequency timbre is used on the bass as with *Fish Market*.

356. Specifically, *Ignorantes* copies elements of the *Fish Market* drum and bass patterns throughout the work. The drum tracks in *Ignorantes* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four

crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Fish Market* appears in *Ignorante* but appears as rim shots instead of a snare drum. copies the pattern played in *Fish Market.* Further, the bass line played in *Ignorantes* follows the patterns of the snare in *Fish Market.* The same sub frequency timbre is used on the bass as with *Fish Market.*

357. Specifically, *Bichiyal* copies elements of the *Fish Market* drum and bass patterns throughout the work. *Bichiyal* is in the same key as *Fish Market.* The drum tracks in *Bichiyal* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Bichiyal* copies the pattern played in *Fish Market.* Further, the bass line played in *Bichiyal* focuses on the song's key root of B flat while placing rhythmic emphasis on beats 1 and 3 of each bar. This pattern copies the bass on *Fish Market.* The bass maintains the same sub frequency timbre as in *Fish Market.*

358. Specifically, *CANCION CON YANDEL* copies elements of the *Fish Market* drum and bass patterns throughout the work. The drum tracks in *CANCION CON YANDEL* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *CANCION CON YANDEL* copies the pattern played in *Fish Market* with the hi-hat replacing the second 8th beat played in *Fish Market's* snare pattern. Further, the bass line played in *CANCION CON YANDEL* plays a semibreve on each bar while maintaining the same sub frequency timbre as in *Fish Market.*

359. Specifically, *MAS DE UNA CITA* copies elements of the *Fish Market* drum and bass patterns throughout the work. The drum tracks in *MAS DE UNA CITA* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *MAS DE UNA CITA* copies the pattern played in *Fish Market.* The synth

tom in *MAS DE UNA CITA* copies the pattern of the synth tom in *Pounder* and *Fish Market* played on beats 1 and 3 of every bar. Further, the bass line played in *MAS DE UNA CITA* places rhythmic emphasis on beats 1 and 3 of each bar as in *Fish Market.* The bass line also maintains a sub frequency timbre in the same way it appears in *Fish Market.*

360. Specifically, *LA CANCION* copies elements of the *Fish Market* drum and bass patterns throughout the work. The drum tracks in *LA CANCION* feature the same kick drum pattern to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *LA CANCION* copies the pattern played in *Fish Market.* The hi-hat in *LA CANCION* emulates aspects of the tambourine pattern played in *Fish Market.* Further, the bass line played in *LA CANCION* maintains a sub frequency timbre in the same way it appears in *Fish Market.*

361. Specifically, *Bellacoso* is a heavily sample driven track featuring a variety of loops taken from several other works containing elements of the *Fish Market* drum patterns. The track is sonically saturated to a point of audible distortion and is interspersed with rhythmic pauses, truncated loops and tempo manipulations. Nonetheless, the fundamental pattern in *Fish Market* is maintained and remains predominant throughout the work. A sampled segment from *Pounder* is heard at 2:40 and is thus inclusive of all the attributes and patterns contained with the sampled segment of *Pounder* and by extension the patterns contained with the *Fish Market* recording.

362. Specifically, *Mia* copies elements of the *Fish Market* drum and bass patterns throughout the work. The *Fish Market* pattern is interspersed throughout the work manipulated in the mix with breaks, edits, drum sounds or stems/loops. However, the fundamental *Fish Market* pattern is maintained and is predominant throughout the work. The drum tracks in *Mia* feature the same kick drum and hi-hat

patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Mia* copies the pattern played in *Fish Market* and is also used as a substitute for the timbale rolls heard at the end of every second bar in *Fish Market.* This can be heard as 2:18-2:23 and at other locations throughout the work. The synth tom in *Mia* copies the pattern of the synth tom in *Pounder* and *Fish Market* played on beats 1 and 3 of every bar. Further, the bass line played in *Mia* is a minimalistic pattern as performed in *Fish Market.* It maintains a similar pattern with emphasis placed on beats 1 and 3 of each bar. A similar sub frequency timbre is used for the bass in the same manner as in *Fish Market.*

363. Specifically, *Bye Me Fui* copies elements of the *Fish Market* drum pattern beginning at approximately 0:10-0:33 with the kick drum pattern interspersed throughout the work. However, the fundamental *Fish Market* pattern is maintained and is predominant throughout *Bye Me Fui*. The drum tracks in *Bye Me Fui* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern played in *Fish Market* is reproduced in *Bye Me Fui* with a rimshot that plays the same fundamental snare drum pattern played in *Fish Market*. However, the third and eleventh sixteenth note beat played on the snare in *Fish Market* is played with a substitute percussion sound. Nonetheless, the combined rimshot and snare substitute patterns together reproduce the snare pattern synonymous with *Fish Market*. The bass line played in *Bye Me Fui* is a minimalistic pattern as performed in *Fish Market.* However, beats 2 and 4 are added to the 1 and 3 pattern in *Fish Market.*

364. Specifically, *Soliá* copies elements of the *Fish Market* drum pattern beginning at approximately 0:31 and is introduced at various other intervals throughout the work. The fundamental pattern in *Fish Market* is maintained and remains predominant throughout the work. The drum tracks in *Soliá* feature the same

kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum equivalent in *Soliá* copies the fundamental snare drum pattern played in *Fish Market*. The second bass in *Soliá* that is introduced at approximately 0:31 copies the rhythmic accent of the bass in *Fish Market* on beats 1 and 3 of each bar.

365. Specifically, *Tarot* copies elements of the *Fish Market* drum pattern beginning at approximately 0:35 and is introduced at various other intervals throughout the work. The fundamental pattern in *Fish Market* is maintained and remains predominant throughout the work. The drum tracks in *Tarot* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum equivalent in *Tarot* copies the fundamental snare drum pattern played in *Fish Market*. The bass line played in *Tarot* is a minimalistic pattern as performed in *Fish Market.* However, beats 2 and 4 are added to the 1 and 3 pattern in *Fish Market.*

366. Specifically, *Tití Me Preguntó* copies elements of the *Fish Market* drum pattern beginning at approximately 1:01 through approximately 2:45. The fundamental pattern in *Fish Market* is maintained and remains predominant throughout the work. The drum tracks in *Tití Me Preguntó* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum in *Tití Me Preguntó* maintains the same pattern as *Fish Market*, however, the third and eleventh sixteenth note played on the snare in *Fish Market* is substituted by a cabassa or similar sounding percussion instrument filling in the missing beats. A similar sub frequency timbre is used for the bass in the same manner as in *Fish Market.*

367. Specifically, *Vete* copies elements of the *Fish Market* drum pattern beginning at approximately 0:34 and is introduced at various other intervals throughout the work. The fundamental pattern in *Fish Market* is maintained and

remains predominant throughout the work. The drum tracks in *Vete* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Vete* copies the fundamental snare drum pattern played in *Fish Market*. The bass in *Vete* copies the rhythmic accent of the bass in *Fish Market* on beats 1 and 3 of each bar.

368. Each of the Bad Bunny Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

369. A comparison of *Fish Market* and each of the Bad Bunny Works establishes that each of the Bad Bunny Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Becky G Allegations

370. As shown in the accompanying Exhibit A, Becky G and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *24/7*, *Bella Ciao*, *Cuando Te Besé*, *En Mi Contra*, *Guapa*, *La Respuesta*, *Mala Santa*, *Mamiii*, *Mayores*, *Me Acostumbré*, *Mejor Así*, *Ni De Ti Ni De Nadie*, *No Drama*, *No Te Pertenezco*, *Si Si*, *Sin Pijama*, *Sola*, *Subiendo*, *Te Superé*, *Todo Cambio*, *Vámonos*, and *Zooted*.

371. Each of *24/7*, *Bella Ciao*, *Cuando Te Besé*, *En Mi Contra*, *Guapa*, *La Respuesta*, *Mala Santa*, *Mamiii*, *Mayores*, *Me Acostumbré*, *Mejor Así*, *Ni De Ti Ni De Nadie*, *No Drama*, *No Te Pertenezco*, *Si Si*, *Sin Pijama*, *Sola*, *Subiendo*, *Te Superé*, *Todo Cambio*, *Vámonos*, and *Zooted* (collectively, the "Becky G Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

372. Specifically, *Guapa* features a truncated sample of *Pounder* capturing a two-beat segment of the pattern in the recording. This copying appears early in the work at approximately 0:11-0:21 and reintroduced at intervals throughout the work. The use of the stated sample in *Guapa*, by extension, serves to introduce a copying of the fundamental patterns contained in *Fish Market.* The drum tracks in *Guapa* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Guapa* copies the pattern played in *Fish Market.* The synth tom in *Guapa* copies the pattern of the synth tom in *Pounder* and *Fish Market* played on beats 1 and 3 of every bar. Further, the bass line played in *Guapa* is a minimalistic pattern as performed in *Fish Market.* It maintains a similar pattern with emphasis placed on beats 1 and 3 of each bar. A similar sub frequency timbre is used for the bass in the same manner as in *Fish Market.*

373. Specifically, *Mayores* incorporates a sample of *Pounder* capturing a two-beat segment of the pattern in the first bar of its 2 bar loop. A loop of the sample is introduced in the recording at approximately 0:40-1:00, 1:20-1:29, 1:49-1:59 and again at 2:29-3:08. The sample/pattern is re-introduced at intervals throughout the work; alternating between other drum loops and breaks. Nonetheless, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout the work. The use of the *Pounder* sample in *Mayores* introduces a copying of the patterns contained in *Fish Market.* The drum tracks in *Mayores* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Mayores* copies the pattern played in *Fish Market.* The synth tom in *Mayores* copies the pattern of the synth tom in *Pounder* and *Fish Market* played on beats 1 and 3 of every bar and copies the synth tom sound found in *Pounder*. Further, the bass alternates between

the *Fish Market* bass pattern which anchors the root of the chords on beats 1 and 3 appearing at 1:49-1:59 and more explorative basslines.

374. Specifically, *Me Acostumbre* incorporates a sample of *Pounder* capturing a two-beat segment of the pattern in the first bar of its 2 bar loop. The sample is played at approximately 0:54-1:03, 1:15-1:25 and 1:36-2:117 in *Me Acostumbre and* is introduced at various intervals throughout the work alternating with other drum loops which copy elements of the *Fish Market* patterns. The use of the *Pounder* sample in *Me Acostumbre* serves to introduce a copying of the patterns contained in *Fish Market.* The drum tracks in *Me Acostumbre* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Me Acostumbre* copies the pattern played in *Fish Market.* The synth tom in *Me Acostumbre* copies the pattern of the synth tom in *Pounder* and *Fish Market* played on beats 1 and 3 of every bar and copies the synth tom sound found in *Pounder*. *Me Acostumbre* also copies a segment of the timbales pattern in *Fish Market* and *Pounder*. This is placed low in the mix, so it is difficult to determine if the timbales sound is a sample from *Pounder* or *Fish Market* or not. Further, the bass alternates between the *Fish Market* bass pattern which anchors the root of the chords on beats 1 and 3 and a more explorative bassline. The timbre of the bass in *Me Acostumbre* is the same sub frequency sound spectrum range as in *Fish Market.*

375. Specifically, *Mamiii* incorporates a sample of *Pounder* capturing a two-beat segment of the pattern in the first bar of its 2 bar loop. The sample is played at approximately 1:08-1:17 in *Mamiii and* is introduced at various intervals throughout the work. The use of the *Pounder* sample in *Mamiii* serves to introduce a copying of the patterns contained in *Fish Market.* The drum tracks in *Mamiii* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in

Mamiii copies the pattern played in *Fish Market.* The synth tom in *Mamiii* copies the pattern of the synth tom in *Pounder* and *Fish Market* played on beats 1 and 3 of every bar. *Mamiii* also copies a segment of the timbales pattern in *Fish Market* and *Pounder*. Further, the timbre of the bass in *Mamiii* is the same sub frequency sound spectrum range as in *Fish Market.*

376. Specifically, *La Respuesta* incorporates a sample of *Pounder* capturing a two-beat segment of the pattern in the first bar of its 2 bar loop. A loop of the sample is introduced early in *La Respuesta* at approximately 0:13-0:32, and is re-introduced at intervals throughout the work alternating with other drum loops and breaks. Nevertheless, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout the work. The use of the *Pounder* sample in *La Respuesta* serves to introduce a copying of the patterns contained in *Fish Market.* The drum tracks in *La Respuesta* feature the same kick drum and hi-hat patterns as those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *La Respuesta* copies the pattern played in *Fish Market.* The synth tom in *La Respuesta* copies the pattern of the synth tom in *Pounder* and *Fish Market* played on beats 1 and 3 of every bar and copies the synth tom sound found in *Pounder*. Further, the bass alternates between the *Fish Market* bass pattern which anchors the root of the chords on beats 1 and 3 found at approximately 1:41-2:02 and a more explorative bassline. The timbre of the bass in *Me Acostumbre* is the same sub frequency sound spectrum range as in *Fish Market.*

377. Specifically, *Sin Pijama* incorporates a sample of *Pounder* capturing a segment of the pattern in the recording. The sample begins at approximately 0:58 in *Sin Pijama* and is reintroduced at intervals throughout the work alternating with a drum loop. The use of the *Pounder* sample in *Sin Pijama* serves to introduce a copying of the patterns contained in *Fish Market.* The drum tracks in *Me Acostumbre* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each

playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Me Acostumbre* copies the pattern played in *Fish Market.* The synth tom in *Me Acostumbre* copies the pattern of the synth tom in *Pounder* and *Fish Market* played on beats 1 and 3 of every bar. *Sin Pijama* also copies a segment of the timbales pattern and sounds synonymous with the timbales in *Fish Market* and *Pounder*. This is placed low in the mix, so it is difficult to determine if the timbales sound is a sample from *Pounder* or *Fish Market* or not. Further, the bass alternates between the *Fish Market* bass pattern which anchors the root of the chords on beats 1 and 3 and a more explorative bassline. The timbre of the bass in *Me Acostumbre* is the same sub frequency sound spectrum range as in *Fish Market.*

378. Specifically, *No Drama* incorporates a sample of *Pounder* capturing a two-beat segment of the pattern in the recording. The sample is played at approximately 0:41-1:05 in *No Drama* and is introduced at various intervals throughout the work alternating with other drum loops which copy elements of the *Fish Market* patterns. The use of the *Pounder* sample in *No Drama* serves to introduce a copying of the patterns contained in *Fish Market.* The drum tracks in *No Drama* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *No Drama* copies the pattern played in *Fish Market.* The synth tom in *No Drama* copies the pattern of the synth tom in *Pounder* and *Fish Market* played on beats 1 and 3 of every bar. Further, the timbre of the bass in *Me Acostumbre* is the same sub frequency sound spectrum range as in *Fish Market.*

379. Each of the Becky G Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

380. A comparison of *Fish Market* and each of the Becky G Works establishes that each of the Becky G Works incorporates both qualitatively and

quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Cali Y El Dandee Allegations

381. As shown in the accompanying Exhibit A, Cali Y El Dandee and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Ay Corazón*, *Besos Tristes*, *Borracho De Amor*, *BYL (Borracha Y Loca)*, *Chino*, *Coldplay*, *Colegio*, *Contigo*, *Despiértate*, *Gol*, *Juega*, *Locura*, *Lumbra*, *Malibu*, *Momentos Para Recordar*, *Nada*, *No hay 2 sin 3*, *No me mires Asi*, *Perdóname*, *Por Ella*, *Por Fin Te Encontré*, *Sirena*, *Te toco perder*, *Tequila Sunrise*, *Tu Nombre*, *Un Tiempo*, *Ven a mi*, *VIVO AHORA*, *Voy Por Ti*, and *Yo No Te Olvido*.

382. Each of *Ay Corazón*, *Besos Tristes*, *Borracho De Amor*, *BYL (Borracha Y Loca)*, *Chino*, *Coldplay*, *Colegio*, *Contigo*, *Despiértate*, *Gol*, *Juega*, *Locura*, *Lumbra*, *Malibu*, *Momentos Para Recordar*, *Nada*, *No hay 2 sin 3*, *No me mires Asi*, *Perdóname*, *Por Ella*, *Por Fin Te Encontré*, *Sirena*, *Te toco perder*, *Tequila Sunrise*, *Tu Nombre*, *Un Tiempo*, *Ven a mi*, *VIVO AHORA*, *Voy Por Ti*, and *Yo No Te Olvido* (collectively, the "Cali Y El Dandee Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

383. Each of the Cali Y El Dandee Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

384. A comparison of *Fish Market* and each of the Cali Y El Dandee Works establishes that each of the Cali Y El Dandee Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Camilo Allegations

385. As shown in the accompanying Exhibit A, Camilo and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *El Mismo Aire*, *Favorito*, *Machu Picchu*, *Mareado*, *Millones*, *No Te Vayas*, *Por Primera Vez*, *Rolex*, *Ropa Cara*, *Si Estoy Contigo*, and *Tutu*.

386. Each of *El Mismo Aire*, *Favorito*, *Machu Picchu*, *Mareado*, *Millones*, *No Te Vayas*, *Por Primera Vez*, *Rolex*, *Ropa Cara*, *Si Estoy Contigo*, and *Tutu* (collectively, the "Camilo Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

387. Each of the Camilo Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

388. A comparison of *Fish Market* and each of the Camilo Works establishes that each of the Camilo Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Carlos Vives Allegations

389. As shown in the accompanying Exhibit A, Carlos Vives and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Al Filo de Tu Amor*, *Canción Bonita*, *El Mar de Sus Ojos*, *For Sale*, *Hechicera*, *La Bicicleta*, *La Tierra Prometida*, *Los Consejos del Difunto*, *Monsieur Bigoté*, *No Te Vayas*, *Nuestro Secreto*, *Pescaíto*, *Robarte Un Beso*, *Si Me Das Tu Amor*, *Todo Me Gusta*, and *Vitamina En Rama*.

390. Each of *Al Filo de Tu Amor*, *Canción Bonita*, *El Mar de Sus Ojos*, *For Sale*, *Hechicera*, *La Bicicleta*, *La Tierra Prometida*, *Los Consejos del Difunto*, *Monsieur Bigoté*, *No Te Vayas*, *Nuestro Secreto*, *Pescaíto*, *Robarte Un Beso*, *Si Me*

Das Tu Amor, *Todo Me Gusta*, and *Vitamina En Rama* (collectively, the "Carlos Vives Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

391. Each of the Carlos Vives Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

392. A comparison of *Fish Market* and each of the Carlos Vives Works establishes that each of the Carlos Vives Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Casper Magico Allegations

393. As shown in the accompanying Exhibit A, Casper Magico and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Cuentale, Desilusion, En Otra Piel, Encendia, Fantasmita, Fantasmita Remix, Groupie Remix, Groupie, H.P.T.A, Karma, La Mas Linda, Loco, Me Pichea, No Me Hables De Amor, No Te Veo (Remix), No Te Veo, and Sola & Vacía*.

394. Each of *Cuentale, Desilusion, En Otra Piel, Encendia, Fantasmita, Fantasmita Remix, Groupie Remix, Groupie, H.P.T.A, Karma, La Mas Linda, Loco, Me Pichea, No Me Hables De Amor, No Te Veo (Remix), No Te Veo, and Sola & Vacíai* (collectively, the "Casper Magico Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

395. Each of the Casper Magico Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

396. A comparison of *Fish Market* and each of the Casper Magico Works establishes that each of the Casper Magico Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

CNCO Allegations

397. As shown in the accompanying Exhibit A, CNCO and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Amor Narcótico*, *Beso*, *Bonita*, *De Cero*, *De Mí*, *Dejaría Todo*, *Demuéstrame*, *Devuélveme Mi Corazón*, *El Amor de Mi Vida*, *Entra en Mi Vida*, *Estoy Enamorado de Ti*, *Fiesta en Mi Casa*, *Hey DJ*, *Honey Boo*, *Imagíname Sin Ti*, *La Ley*, *La Quiero a Morir*, *Llegaste Tú*, *Mala Actitud*, *Mamita*, *Mi Medicina*, *Mis Ojos Lloran por Ti*, *My Boo*, *No Entiendo*, *No Me Sueltes*, *Noche Inolvidable*, *Para Enamorarte*, *Pegao*, *Primera Cita*, *Qué Va a Ser de Mí*, *Quisiera*, *Reggaetón Lento*, *Reggaetón Lento (Remix)*, *Se Vuelve Loca*, *Solo Importas Tú*, *Sólo Yo*, *Tan Enamorados*, *Tan Fácil*, and *Volverte a Ver*.

398. Each of *Amor Narcótico*, *Beso*, *Bonita*, *De Cero*, *De Mí*, *Dejaría Todo*, *Demuéstrame*, *Devuélveme Mi Corazón*, *El Amor de Mi Vida*, *Entra en Mi Vida*, *Estoy Enamorado de Ti*, *Fiesta en Mi Casa*, *Hey DJ*, *Honey Boo*, *Imagíname Sin Ti*, *La Ley*, *La Quiero a Morir*, *Llegaste Tú*, *Mala Actitud*, *Mamita*, *Mi Medicina*, *Mis Ojos Lloran por Ti*, *My Boo*, *No Entiendo*, *No Me Sueltes*, *Noche Inolvidable*, *Para Enamorarte*, *Pegao*, *Primera Cita*, *Qué Va a Ser de Mí*, *Quisiera*, *Reggaetón Lento*, *Reggaetón Lento (Remix)*, *Se Vuelve Loca*, *Solo Importas Tú*, *Sólo Yo*, *Tan Enamorados*, *Tan Fácil*, and *Volverte a Ver* (collectively, the "CNCO Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

399. Each of the CNCO Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

400. A comparison of *Fish Market* and each of the CNCO Works establishes that each of the CNCO Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Dalex Allegations

401. As shown in the accompanying Exhibit A, Dalex and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Bellaquita*, *Bellaquita (Remix)*, *Fantasia*, *Feeling*, *Hola*, *Hola Remix*, *Indomable*, *Jockey*, *+Linda*, *Lo Que Te Gusta*, *Matemáticas*, *Mejor*, *Mi Cama*, *Perfume*, *Prendía*, *Qué Tal*, *Rompe*, and *Yo No Me Enamoro*.

402. Each of *Bellaquita*, *Bellaquita (Remix)*, *Fantasia*, *Feeling*, *Hola*, *Hola Remix*, *Indomable*, *Jockey*, *+Linda*, *Lo Que Te Gusta*, *Matemáticas*, *Mejor*, *Mi Cama*, *Perfume*, *Prendía*, *Qué Tal*, *Rompe*, and *Yo No Me Enamoro* (collectively, the "Dalex Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

403. Each of the Dalex Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

404. A comparison of *Fish Market* and each of the Dalex Works establishes that each of the Dalex Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Danna Paola Allegations

405. As shown in the accompanying Exhibit A, Danna Paola and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Cachito*, *Final Feliz*, *Friend De Semana*, *Kaprichosa*, *Mala Fama*, *Mala Fama (Remix)*, *MIA*, *No Bailes Sola*, *Oye Pablo*, *Polo A Tierra*, *Sodio*, and *TQ Y YA*.

406. Each of *Cachito*, *Final Feliz*, *Friend De Semana*, *Kaprichosa*, *Mala Fama*, *Mala Fama (Remix)*, *MIA*, *No Bailes Sola*, *Oye Pablo*, *Polo A Tierra*, *Sodio*, and *TQ Y YA* (collectively, the "Danna Paola Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

407. Each of the Danna Paola Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

408. A comparison of *Fish Market* and each of the Danna Paola Works establishes that each of the Danna Paola Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Danny Ocean Allegations

409. As shown in the accompanying Exhibit A, Danny Ocean and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *ADO*, *Apartamento*, *Baby I Won't*, *Báilame*, *Cuando Me Acerco A Ti*, *Cuántas veces*, *Dembow*, *Dorito & Coca-Cola*, *Epa Wei*, *Fuera del mercado*, *Istanbul*, *Me Rehúso*, and *Tú no me conoces*.

410. Each of *ADO*, *Apartamento*, *Baby I Won't*, *Báilame*, *Cuando Me Acerco A Ti*, *Cuántas veces*, *Dembow*, *Dorito & Coca-Cola*, *Epa Wei*, *Fuera del mercado*, *Istanbul*, *Me Rehúso*, and *Tú no me conoces* (collectively, the "Danny Ocean

Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

411. Each of the Danny Ocean Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

412. A comparison of *Fish Market* and each of the Danny Ocean Works establishes that each of the Danny Ocean Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

De La Ghetto Allegations

413. As shown in the accompanying Exhibit A, De La Ghetto and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Acércate*, *Ahí Ahí Ahí*, *Amantes*, *Bienvenido Al Bellakeo*, *Caliente*, *Chica Mala*, *Cogelo Pa' Ti*, *Como Baila*, *Cuando Será*, *Dices*, *Dices (Remix)*, *El Que Se Enamora Pierde*, *El Volante*, *Ella es Especial*, *Exitandonos*, *Frío Olímpico*, *Loco Por Perrearte*, *Loco Por Perrearte Remix*, *Mami*, *Me Acostumbre*, *Me Parece*, *Mi Fanatica*, *Mi Fanatica (Remix)*, *Mírala*, *No Me Digas Que No*, *Perdida*, *Que Tengo Que Aser*, *Relájate Conmigo*, *Se Te Nota*, *Selfie*, *Sin Perse*, *Sube La Music*, *Subelo*, *Todas En Fila*, *Todas En Fila (Remix)*, *Todo el Amor*, and *Vamonos Calle*.

414. Each of *Acércate*, *Ahí Ahí Ahí*, *Amantes*, *Bienvenido Al Bellakeo*, *Caliente*, *Chica Mala*, *Cogelo Pa' Ti*, *Como Baila*, *Cuando Será*, *Dices*, *Dices (Remix)*, *El Que Se Enamora Pierde*, *El Volante*, *Ella es Especial*, *Exitandonos*, *Frío Olímpico*, *Loco Por Perrearte*, *Loco Por Perrearte Remix*, *Mami*, *Me Acostumbre*, *Me Parece*, *Mi Fanatica*, *Mi Fanatica (Remix)*, *Mírala*, *No Me Digas Que No*, *Perdida*, *Que Tengo Que Aser*, *Relájate Conmigo*, *Se Te Nota*, *Selfie*, *Sin Perse*, *Sube*

La Music, *Subelo*, *Todas En Fila*, *Todas En Fila (Remix)*, *Todo el Amor*, and *Vamonos Calle* (collectively, the "De La Ghetto Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

415. Each of the De La Ghetto Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

416. A comparison of *Fish Market* and each of the De La Ghetto Works establishes that each of the De La Ghetto Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Dímelo Flow Allegations

417. As shown in the accompanying Exhibit A, Dímelo Flow and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Crazy*, *Dime Ave*, *Doble Cara*, *El Favor*, *FKU*, *Girl Like You*, *Hickey*, *La Isla*, *Masoquista*, *Mi Favorita*, *Mi Perfume*, *MMC*, *Nadie La Dejo*, *No Es Normal*, *Otra Copa*, *Pártela*, *Pirueta*, *Por Fin*, *Punto De Vista*, *Qué Me Contás*, *Reggaetón*, *Se Le Ve*, *Suelta*, *Un Plan*, and *Winnie Pooh*.

418. Each of *Crazy*, *Dime Ave*, *Doble Cara*, *El Favor*, *FKU*, *Girl Like You*, *Hickey*, *La Isla*, *Masoquista*, *Mi Favorita*, *Mi Perfume*, *MMC*, *Nadie La Dejo*, *No Es Normal*, *Otra Copa*, *Pártela*, *Pirueta*, *Por Fin*, *Punto De Vista*, *Qué Me Contás*, *Reggaetón*, *Se Le Ve*, *Suelta*, *Un Plan*, and *Winnie Pooh* (collectively, the "Dímelo Flow Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

419. Each of the Dímelo Flow Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

420. A comparison of *Fish Market* and each of the Dímelo Flow Works establishes that each of the Dímelo Flow Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

DJ Snake Allegations

421. As shown in the accompanying Exhibit A, DJ Snake and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Fuego*, *Loco Contigo*, *Magenta Riddim*, *Selfish Love*, and *Taki Taki*.

422. Each of *Fuego*, *Loco Contigo*, *Magenta Riddim*, *Selfish Love*, and *Taki Taki* (collectively, the "DJ Snake Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

423. Each of the DJ Snake Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

424. A comparison of *Fish Market* and each of the DJ Snake Works establishes that each of the DJ Snake Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Drake Allegations

425. As shown in the accompanying Exhibit A, Drake and a plurality of the defendants, the corresponding defendants for each song named therein, have released the song entitled *One Dance*.

426. *One Dance* (the "Drake Work") was released subsequent to the 1989 release of *Fish Market*.

427. The Drake Work incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

428. A comparison of *Fish Market* and the Drake Work establishes that the Drake Work incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Enrique Iglesias Allegations

429. As shown in the accompanying Exhibit A, Enrique Iglesias and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Bailando*, *Duele El Corazon*, *El Baño*, *Me Pase*, *Miss You*, *Move To MIAMI*, *Nos Fuimos Lejos*, *Pendejo*, *Subeme La Radio*, and *Te Fuiste*.

430. Each of *Bailando*, *Duele El Corazon*, *El Baño*, *Me Pase*, *Miss You*, *Move To MIAMI*, *Nos Fuimos Lejos*, *Pendejo*, *Subeme La Radio*, and *Te Fuiste* (collectively, the "Enrique Iglesias Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

431. Each of the Enrique Iglesias Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

432. A comparison of *Fish Market* and each of the Enrique Iglesias Works establishes that each of the Enrique Iglesias Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Farruko Allegations

433. As shown in the accompanying Exhibit A, Farruko and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Amaneció*, *Back To The Future*, *Bebe Conmigo*, *Besas Tan Bien*, *Boomboneo*, *Booty Booty*, *Borinquen Bella*, *Cartier*, *Chillax*, *Chulería en Pote*, *Coolant*, *Cositas Que Haciamos*, *Crazy in Love*, *Dale Dembow*, *Dale Que Voy*, *Dime que hago*, *El único*, *Es hora*, *Fantasy*, *Fichurear*, *Forever Alone*, *Fuego*, *GATAS*, *BOCINAS & BAJO*, *Ganas*, *GangaXtrip*, *Get Together*, *GUILLAO*, *Hacerte El Amor*, *Hola Beba*, *Hoy*, *Illusion*, *Inolvidable*, *Interesada*, *Intimidad*, *La Cartera*, *La Noche*, *La Nueva Gerencia*, *La Tóxica*, *lejos de aquí*, *Me trancaro*, *Menor*, *Mi Vida No Va A Cambiar*, *Miro El Reloj*, *MÚSICA*, *Nadie*, *Nena Fichu*, *No Es Una Gial*, *No Quiere Saber*, *No Soy*, *Obsesionado*, *Pa' Darle*, *Pa' Romper La Discoteca*, *Papi Champú*, *Paredes De Hielo*, *Passion Whine*, *Pasto y pelea*, *Piquete*, *Pórtate Mal*, *Power*, *Pura Falsedad*, *Qué Hay de Malo*, *Quédate*, *RaPaPam*, *Recordarte*, *Resort*, *Roatán*, *Rompe el Suelo*, *Salgo*, *Sin Ti*, *Sorpresa*, *Suéltate Tú*, *Te Iré a Buscar*, *Te suelto el pelo*, *Te Va A Doler*, *Tensión*, *Tiempos*, *Titerito*, *Todo Cambio*, *Traime a tu Amiga*, *TrapXFicante (RIP Almighty)*, *Una lágrima*, *Va a toa*, *Visionary*, *Voy A 100*, *Web Cam*, *XOXA*, and *Zaranana*.

434. Each of *Amaneció*, *Back To The Future*, *Bebe Conmigo*, *Besas Tan Bien*, *Boomboneo*, *Booty Booty*, *Borinquen Bella*, *Cartier*, *Chillax*, *Chulería en Pote*, *Coolant*, *Cositas Que Haciamos*, *Crazy in Love*, *Dale Dembow*, *Dale Que Voy*, *Dime que hago*, *El único*, *Es hora*, *Fantasy*, *Fichurear*, *Forever Alone*, *Fuego*, *GATAS*, *BOCINAS & BAJO*, *Ganas*, *GangaXtrip*, *Get Together*, *GUILLAO*, *Hacerte El Amor*, *Hola Beba*, *Hoy*, *Illusion*, *Inolvidable*, *Interesada*, *Intimidad*, *La Cartera*, *La Noche*, *La Nueva Gerencia*, *La Tóxica*, *lejos de aquí*, *Me trancaro*, *Menor*, *Mi Vida No Va A Cambiar*, *Miro El Reloj*, *MÚSICA*, *Nadie*, *Nena Fichu*, *No Es Una Gial*, *No Quiere Saber*, *No Soy*, *Obsesionado*, *Pa' Darle*, *Pa' Romper La Discoteca*, *Papi Champú*, *Paredes De Hielo*, *Passion Whine*, *Pasto y pelea*, *Piquete*, *Pórtate Mal*, *Power*, *Pura*

Falsedad, *Qué Hay de Malo*, *Quédate*, *RaPaPam*, *Recordarte*, *Resort*, *Roatán*, *Rompe el Suelo*, *Salgo*, *Sin Ti*, *Sorpresa*, *Suéltate Tú*, *Te Iré a Buscar*, *Te suelto el pelo*, *Te Va A Doler*, *Tensión*, *Tiempos*, *Titerito*, *Todo Cambio*, *Traime a tu Amiga*, *TrapXFicante (RIP Almighty)*, *Una lágrima*, *Va a toa*, *Visionary*, *Voy A 100*, *Web Cam*, *XOXA*, and *Zaranana* (collectively, the "Farruko Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

435. Specifically, *Aullando* incorporates a truncated sample taken directly from *Pounder* and *Fish Market* and is introduced at approximately 1:01 and is looped at various intervals throughout *Aullando*. *Aullando* copies the fundamental drum and bass patterns in *Fish Market* and is looped throughout most of the work. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Aullando*. Additionally, the drum tracks in *Aullando* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Aullando* is the same snare drum in *Fish Market.* The timbale in *Aullando* copies elements of the timbale pattern in *Fish Market* and *Pounder*. The synth tom in *Aullando* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Aullando* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Aullando* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

436. Specifically, *Callao* incorporates a truncated sample taken directly from *Pounder* and *Fish Market* and is introduced at approximately 1:18 and is looped at various intervals throughout *Callao*. *Callao* copies the second bar of the timbale pattern from *Pounder*. *Callao* copies the fundamental drum pattern in *Fish Market* and is looped throughout most of the work. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and

remains dominant throughout *Callao*. Additionally, the drum tracks in *Callao* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Callao* is the same snare drum in *Fish Market.* The timbale in *Callao* copies elements of the timbale pattern in *Fish Market* and *Pounder*. The synth tom in *Callao* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Callao* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Callao* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder.*

437. Specifically, *Chica Bombastic* incorporates a truncated sample taken directly from *Pounder* and *Fish Market*, and is introduced at approximately 0:32-0:53, 1:04-1:28, 1:39-1:49, 2:04-2:11, 2:23-2:44 and 2:57-3:16 and is looped at various intervals throughout *Chica Bombastic*. *Chica Bombastic* copies the fundamental drum pattern in *Fish Market* and is looped throughout most of the work. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Chica Bombastic*. Additionally, the drum tracks in *Chica Bombastic* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Chica Bombastic* is the same snare drum in *Fish Market.* The timbale in *Chica Bombastic* copies elements of the timbale pattern in *Fish Market* and *Pounder*. The synth tom in *Chica Bombastic* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Chica Bombastic* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Chica Bombastic* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder.*

438. Specifically, *Dame Algo* incorporates a sample taken directly from *Pounder* and *Fish Market*, and is introduced at approximately 0:58-1:07, 1:08-1:17, 1:39-1:48, 2:10-2:19, 2:41-2:50, 2:52-2:59, 3:02-3:07, 4:04-4:12, and 4:24-4:37 and is looped at various intervals throughout *Dame Algo*. *Dame Algo* copies the fundamental drum pattern in *Fish Market* and is looped throughout most of the work. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in Fish Market is maintained and remains dominant throughout Dame Algo. Additionally, the drum tracks in *Dame Algo* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Dame Algo* is the same snare drum in *Fish Market*. The timbale in *Dame Algo* copies the timbale pattern in *Pounder*. The synth tom in *Dame Algo* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Dame Algo* copies *Fish Market's* bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Dame Algo* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

439. Specifically, *Deseo* incorporates a sample taken directly from *Pounder* and *Fish Market*, and is introduced at approximately 0:32-0:42, 0:55-1:04, 1:16-1:26,1:38-1:48, 2:22-2:31, 2:43-2:53, 3:15-3:24, and 3:36-3:24, and 3:36-3:48 and is looped at various intervals throughout *Deseo*. *Deseo* copies the fundamental drum pattern in *Fish Market* and is looped throughout most of the work. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Deseo*. Additionally, the drum tracks in *Deseo* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Deseo* is the same snare drum in *Fish Market*. The timbale in *Deseo* copies elements of the timbale pattern in *Fish Market* and *Pounder*. The synth tom in

Deseo copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Deseo* copies *Fish Market's* bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Deseo* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

440. Specifically, *Guaya* incorporates a sample taken directly from *Pounder* and *Fish Market* and is introduced at approximately 1:03-1:21 and 1:44-2:02. *Guaya* copies the fundamental drum pattern in *Fish Market* and is looped throughout most of the work. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Guaya*. Additionally, the drum tracks in *Guaya* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Guaya* is the same snare drum in *Fish Market.* The timbale in *Guaya* copies the timbale pattern in *Pounder*. The synth tom in *Guaya* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Guaya* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Guaya* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

441. Specifically, *La Luz* incorporates a sample taken directly from *Pounder* and *Fish Market,* and is introduced at approximately 1:15-1:33, 1:45-1:53, 2:04-2:12, 2:24-2:33, 2:44-2:52, 3:04-3:12, 3:16-3:23, 3:33-3:43, and 4:03-4:11 and is looped at various intervals throughout *La Luz*. *La Luz* copies the fundamental drum pattern in *Fish Market* and is looped throughout most of the work. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *La Luz*. Additionally, the drum tracks in *La Luz* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern

in *La Luz* is the same snare drum in *Fish Market.* The timbale in *La Luz* copies elements of the timbale pattern in *Pounder*. The synth tom in *La Luz* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *La Luz* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *La Luz* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

442. Specifically, *Reggaetón en lo Oscuro* incorporates a sample taken directly from *Pounder* and *Fish Market,* and is introduced at approximately 0:46-1:05,1:18-1:48, 2:10-2:30, 2:53-3:12, and 3:27-3:43 and is looped at various intervals throughout *Reggaetón en lo Oscuro*. *Reggaetón en lo Oscuro* copies the fundamental drum pattern in *Fish Market* and is looped throughout most of the work. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Reggaetón en lo Oscuro*. Additionally, the drum tracks in *Reggaetón en lo Oscuro* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Reggaetón en lo Oscuro* is the same snare drum in *Fish Market.* The timbale in *Reggaetón en lo Oscuro* copies the timbale pattern in *Pounder*. The synth tom in *Reggaetón en lo Oscuro* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Reggaetón en lo Oscuro* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Reggaetón en lo Oscuro* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

443. Specifically, *Todo Comienza en la Disco* incorporates a sample taken directly from *Pounder* and *Fish Market,* and is introduced at approximately 1:14-1:34, 1:45-1:50, 2:06-2:36, 3:11-3:19, 3:32-3:52, 4:14-4:44, 4:55-5:03 and is looped at various intervals throughout *Todo Comienza en la Disco*. *Todo Comienza en la*

Disco copies the fundamental drum pattern in *Fish Market* and is looped throughout most of the work. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Todo Comienza en la Disco*. Additionally, the drum tracks in *Todo Comienza en la Disco* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Todo Comienza en la Disco* is the same snare drum in *Fish Market.* The timbale in *Todo Comienza en la Disco* copies the timbale pattern in *Pounder*. The synth tom in *Todo Comienza en la Disco* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Todo Comienza en la Disco* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Todo Comienza en la Disco* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

444. Each of the Farruko Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

445. A comparison of *Fish Market* and each of the Farruko Works establishes that each of the Farruko Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Feid Allegations

446. As shown in the accompanying Exhibit A, Feid and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *911*, *BORRAXXA*, *CHIMBITA*, *Feliz Cumpleaños Ferxxo*, *FERXXO X ÑEJO* , *Ferxxo 100*, *FRESH KERIAS*, *FRIKI*, *FUMETEO*, *Normal*,

Nuestra Canción, Perfecta, Porfa, PORFA (Remix), PURRITO APA, Que Raro, RELXJXTE, Ron (Remix), SI TÚ SUPIERAS, VACAXIONES, and *XNTXS.*

447. Each of *911, BORRAXXA, CHIMBITA, Feliz Cumpleaños Ferxxo, FERXXO X ÑEJO, Ferxxo 100, FRESH KERIAS, FRIKI, FUMETEO, Normal, Nuestra Canción, Perfecta, Porfa, PORFA (Remix), PURRITO APA, Que Raro, RELXJXTE, Ron (Remix), SI TÚ SUPIERAS, VACAXIONES*, and *XNTXS* (collectively, the "Feid Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

448. Each of the Feid Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

449. A comparison of *Fish Market* and each of the Feid Works establishes that each of the Feid Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Gente de Zona Allegations

450. As shown in the accompanying Exhibit A, Gente de Zona and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Algo Contigo, El Mentiroso, Hazle Completo El Cuento, La Gozadera, La Tentación, Lo Que Tú y Yo Vivimos, Loco Loco, Mas Macarena, Me Da Lo Mismo, Momento, No te dejo sola, Otra Botella, Poquito a Poco, Que Tú Quieres, Quiero Conocerte, Seré, Si No Vuelves, Tan Buena, Te Duele, Traidora*, and *Tu y Yo*.

451. Each of *Algo Contigo, El Mentiroso, Hazle Completo El Cuento, La Gozadera, La Tentación, Lo Que Tú y Yo Vivimos, Loco Loco, Mas Macarena, Me Da Lo Mismo, Momento, No te dejo sola, Otra Botella, Poquito a Poco, Que Tú*

Quieres, *Quiero Conocerte*, *Seré*, *Si No Vuelves*, *Tan Buena*, *Te Duele*, *Traidora*, and *Tu y Yo* (collectively, the "Gente de Zona Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

452. Each of the Gente de Zona Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

453. A comparison of *Fish Market* and each of the Gente de Zona Works establishes that each of the Gente de Zona Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Greeicy Allegations

454. As shown in the accompanying Exhibit A, Greeicy and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *A Mí No*, *Aguardiente*, *Amantes*, *Contigo*, *Cuando te vi*, *Destino*, *Error*, *Ganas*, *Jacuzzi*, *Los Besos*, *Los Consejos*, *Más Fuerte*, *Menos De Ti*, *Mentira*, *Minifalda*, and *Tóxico*.

455. Each of *A Mí No*, *Aguardiente*, *Amantes*, *Contigo*, *Cuando te vi*, *Destino*, *Error*, *Ganas*, *Jacuzzi*, *Los Besos*, *Los Consejos*, *Más Fuerte*, *Menos De Ti*, *Mentira*, *Minifalda*, and *Tóxico* (collectively, the "Greeicy Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

456. Specifically, *A Mí No* incorporates a truncated sample taken directly from *Pounder* and *Fish Market*, and is introduced at approximately 0:28-0:50, 1:01-1:22, 1:34-1:55, 1:56-2:06, 2:07-2:40 and 2:51-3:07. The 2 bars sample originated from *Pounder*.

457. Specifically, *Cuando te vi* incorporates a truncated sample taken directly from *Pounder* and *Fish Market*, and is introduced at approximately 1:25-1:37 and

2:22-2:35. The 2 bars sample originated from *Pounder*. Additionally, *Cuando te vi* uses elements of the fundamental drum pattern in *Fish Market* and is looped throughout most of the work.

458. Specifically, *Destino* incorporates a truncated sample taken directly from *Pounder* and *Fish Market*, and is introduced at approximately 0:44-0:53, 1:05-1:14, 1:35-1:50, 2:16-2:25, and 2:39-2:46. The 2 bars sample originated from *Pounder*. *Destino* uses elements of the fundamental drum pattern in *Fish Market* and is looped throughout most of the work. Additionally, *Destino* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3 at 0:44-1:24.

459. Specifically, *Jacuzzi* incorporates a truncated sample taken directly from *Pounder* and *Fish Market*, and is introduced at approximately 0:36-0:54, 1:38-1:46, 1:54-2:03, 2:25-2:34, and 2:43-2:52. The 2 bars sample originated from *Pounder*. *Jacuzzi* uses elements of the fundamental drum pattern in *Fish Market* and is looped throughout most of the work. Additionally, *Jacuzzi* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Jacuzzi* is the same sub frequency sound spectrum range as in *Fish Market.*

460. Each of the Greeicy Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

461. A comparison of *Fish Market* and each of the Greeicy Works establishes that each of the Greeicy Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Ivy Queen Allegations

462. As shown in the accompanying Exhibit A, Ivy Queen and a plurality of the defendants, the corresponding defendants for each song named therein, have

released the songs entitled *Amor Puro*, *La Vida Es Así*, *Te He Querido*, *Te He Llorado*, and *Yo Quiero Bailar*.

463. Each of *Amor Puro*, *La Vida Es Así*, *Te He Querido*, *Te He Llorado*, and *Yo Quiero Bailar* (collectively, the "Ivy Queen Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

464. Each of the Ivy Queen Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

465. A comparison of *Fish Market* and each of the Ivy Queen Works establishes that each of the Ivy Queen Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

J Balvin Allegations

466. As shown in the accompanying Exhibit A, J Balvin and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *6AM*, *Abrázame*, *Abusadora*, *Acércate*, *Agua*, *Ahora*, *Amarillo*, *Ambiente*, *Arcoíris*, *Ay Vamos*, *Azul*, *Bajo La Luna*, *Blanco*, *Bobo*, *Bonita Remix*, *Bonita*, *Como Un Animal*, *Como Yo*, *Con Flow Mátalo*, *Cuando Tú Quieras*, *Cuidao Por Ahí*, *Dame mas*, *Déjate Llevar*, *Desnúdate*, *Dónde Estarás*, *Ella me cautivo*, *En Lo Oscuro*, *Éxtasis*, *Ginza*, *Gris*, *Hola*, *Hola que tal*, *Imaginándote*, *La Canción*, *La Venganza*, *Machika*, *Malvada*, *Mami*, *Me Gustas Tú*, *Mi Corazón*, *Mi Gente*, *Mojaita*, *Morado*, *Negro*, *Nivel De Perreo*, *No Es Justo*, *Noche de pasión*, *Noches Pasadas*, *Peligrosa*, *Pierde Los Modales*, *Poblado*, *Por un día*, *Porque Tu*, *Primera cita*, *Qué Más Pues?*, *Que Pretendes*, *Reggaeton*, *Rojo*, *Rosa*, *Safari*, *Se Aloca*, *Seguiré Subiendo*, *Sencillo*, *Sigo Extrañándote*, *Sin Compromiso*, *Solitario*, *Ten Cuidado (Pokémon 25 Version)*, *Tranquila*, *Tú Tienes Algo*, *Tu Veneno*, *Un Dia (One*

Day), Un día sin ti, Un Peso, Un Sueño, Una Nota, Verde, Vestido, and *Yo Te Lo Dije*.

467. Each of *6AM, Abrázame, Abusadora, Acércate, Agua, Ahora, Amarillo, Ambiente, Arcoíris, Ay Vamos, Azul, Bajo La Luna, Blanco, Bobo, Bonita Remix, Bonita, Como Un Animal, Como Yo, Con Flow Mátalo, Cuando Tú Quieras, Cuidao Por Ahí, Dame mas, Déjate Llevar, Desnúdate, Dónde Estarás, Ella me cautivo, En Lo Oscuro, Éxtasis, Ginza, Gris, Hola, Hola que tal, Imaginándote, La Canción, La Venganza, Machika, Malvada, Mami, Me Gustas Tú, Mi Corazón, Mi Gente, Mojaita, Morado, Negro, Nivel De Perreo, No Es Justo, Noche de pasión, Noches Pasadas, Peligrosa, Pierde Los Modales, Poblado, Por un día, Porque Tu, Primera cita, Qué Más Pues?, Que Pretendes, Reggaeton, Rojo, Rosa, Safari, Se Aloca, Seguiré Subiendo, Sencillo, Sigo Extrañándote, Sin Compromiso, Solitario, Ten Cuidado (Pokémon 25 Version), Tranquila, Tú Tienes Algo, Tu Veneno, Un Dia (One Day), Un día sin ti, Un Peso, Un Sueño, Una Nota, Verde, Vestido*, and *Yo Te Lo Dije* (collectively, the "J Balvin Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

468. Each of the J Balvin Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

469. A comparison of *Fish Market* and each of the J Balvin Works establishes that each of the J Balvin Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Jason Derulo Allegations

470. As shown in the accompanying Exhibit A, Jason Derulo and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Colors*, *Goodbye*, *Love Not War*, and *Mamacita*.

471. Each of *Colors*, *Goodbye*, *Love Not War*, and *Mamacita* (collectively, the "Jason Derulo Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

472. Each of the Jason Derulo Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

473. A comparison of *Fish Market* and each of the Jason Derulo Works establishes that each of the Jason Derulo Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Jawsh 685 Allegations

474. As shown in the accompanying Exhibit A, Jawsh 685 and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Laxed (SIREN BEAT)*, *Savage Love (Laxed - Siren Beat)*, and *Sweet & Sour (feat. Lauv & Tyga)*.

475. Each of *Laxed (SIREN BEAT)*, *Savage Love (Laxed - Siren Beat)*, and *Sweet & Sour (feat. Lauv & Tyga)* (collectively, the "Jawsh 685 Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

476. Each of the Jawsh 685 Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

477. A comparison of *Fish Market* and each of the Jawsh 685 Works establishes that each of the Jawsh 685 Works incorporates both qualitatively and

quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Jay Wheeler Allegations

478. As shown in the accompanying Exhibit A, Jay Wheeler and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Cuando Fue, Cuéntale, Esa Nota, Fuiste Tu , La Curiosidad, Nada Serio, Otra Noche Más, Otra Noche Más, Se Rebeló, Sin Ti, Viendo El Techo*, and *Vivir*.

479. Each of *Cuando Fue, Cuéntale, Esa Nota, Fuiste Tu , La Curiosidad, Nada Serio, Otra Noche Más, Otra Noche Más, Se Rebeló, Sin Ti, Viendo El Techo,*and *Vivir*. (collectively, the "Jay Wheeler Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

480. Each of the Jay Wheeler Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

481. A comparison of *Fish Market* and each of the Jay Wheeler Works establishes that each of the Jay Wheeler Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Jhay Cortez Allegations

482. As shown in the accompanying Exhibit A, Jhay Cortez and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Apaga Las Luces, Christian Dior, Como Se Siente, Cuando Bebe, Dale Como Es, Deséame Suerte, Deseos, Deseos (Remix), Dile (Homenaje), Dime A Ve, Donde No Se Vea, Easy (Remix), Easy, Esta Dejá,*

Imaginaste (Remix), Ley Seca, Los Rompediskoteca, Más De Una, Mi Vicio, No Me Conoce (Remix), Popular, Ropa Interior, Somos Iguales, Tocarte, and *Y No Le Conviene*.

483. Each of *Apaga Las Luces, Christian Dior, Como Se Siente, Cuando Bebe, Dale Como Es, Deséame Suerte, Deseos, Deseos (Remix), Dile (Homenaje), Dime A Ve, Donde No Se Vea, Easy (Remix), Easy, Esta Dejá, Imaginaste (Remix), Ley Seca, Los Rompediskoteca, Más De Una, Mi Vicio, No Me Conoce (Remix), Popular, Ropa Interior, Somos Iguales, Tocarte*, and *Y No Le Conviene* (collectively, the "Jhay Cortez Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

484. Each of the Jhay Cortez Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

485. A comparison of *Fish Market* and each of the Jhay Cortez Works establishes that each of the Jhay Cortez Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Justin Quiles Allegations

486. As shown in the accompanying Exhibit A, Justin Quiles and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Apretón, Colorín Colorado, Comerte A Besos, Como Si Nah, Confusión, Contradicción, Cuando Salgo, Desaparecida, DJ No Pare, DJ No Pare REMIX, Dos Locos, Egoista, El Party Se Formó, Esta Noche ft. Farruko (Remake), Esta Noche, Fin De Semana, Gladiadora, Hombre Cómo Yo, Honestamente, Impulsivo, Instagram, Jeans, Juraste, La Amiga, La Botella, Leyenda, Loco, Loco Por Verte, Me Curare, Me Frontió, Mi Maldicion, Monstruo, No*

Descanses, No es de Hombre, No La Toques, No Quiero Amarte, No Respondo, Nos Envidian, Ocean Park, Orgullo, Orgullo (Remix), Otra Copa, Otra Vez, PAM, Pendiente De Usted, Ponte Pa' Mi, Quítate Eso, Rabia, Ropa interior, Shorty, Se Te Olvidó, Si El Mundo Se Acabara, Si Ella Quisiera, Si Tu, Sustancia, Textos Sucios, Tienes Razón, Un Rato, and *Vacaciones Por Tu Cuerpo*.

487. Each of *Apretón, Colorín Colorado, Comerte A Besos, Como Si Nah, Confusión, Contradicción, Cuando Salgo, Desaparecida, DJ No Pare, DJ No Pare REMIX, Dos Locos, Egoista, El Party Se Formó, Esta Noche ft. Farruko (Remake), Esta Noche, Fin De Semana, Gladiadora, Hombre Cómo Yo, Honestamente, Impulsivo, Instagram, Jeans, Juraste, La Amiga, La Botella, Leyenda, Loco, Loco Por Verte, Me Curare, Me Frontió, Mi Maldicion, Monstruo, No Descanses, No es de Hombre, No La Toques, No Quiero Amarte, No Respondo, Nos Envidian, Ocean Park, Orgullo, Orgullo (Remix), Otra Copa, Otra Vez, PAM, Pendiente De Usted, Ponte Pa' Mi, Quítate Eso, Rabia, Ropa interior, Shorty, Se Te Olvidó, Si El Mundo Se Acabara, Si Ella Quisiera, Si Tu, Sustancia, Textos Sucios, Tienes Razón, Un Rato,* and *Vacaciones Por Tu Cuerpo* (collectively, the "Justin Quiles Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

488. Each of the Justin Quiles Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

489. A comparison of *Fish Market* and each of the Justin Quiles Works establishes that each of the Justin Quiles incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Karol G Allegations

490. As shown in the accompanying Exhibit A, Karol G and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *A Ella, A Solas, ARRANCA PAL CARAJO, Ay, DiOs Mío!, Bebesita, BICHOTA, Casi Nada, CONTIGO VOY A MUERTE, Créeme, DÉJALOS QUE MIREN, Dime, Dime Que Si, DVD, EL BARCO, EL MAKINON, En la Playa, Eres Mi Todo, GATÚBELA, Go Karo, Hello, La Dama, La Vida Continuó, LEYENDAS, LOCATION, Love With A Quality, Mi Cama (Remix), Mi Cama, ODISEA, Pineapple, Punto G, SEJODIOTO, SOLA ES MEJOR, Tusa, Tusa (Remix)*, and *Ya No Te Creo*.

491. Each of *A Ella, A Solas, ARRANCA PAL CARAJO, Ay, DiOs Mío!, Bebesita, BICHOTA, Casi Nada, CONTIGO VOY A MUERTE, Créeme, DÉJALOS QUE MIREN, Dime, Dime Que Si, DVD, EL BARCO, EL MAKINON, En la Playa, Eres Mi Todo, GATÚBELA, Go Karo, Hello, La Dama, La Vida Continuó, LEYENDAS, LOCATION, Love With A Quality, Mi Cama (Remix), Mi Cama, ODISEA, Pineapple, Punto G, SEJODIOTO, SOLA ES MEJOR, Tusa, Tusa (Remix)*, and *Ya No Te Creo* (collectively, the "Karol G Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

492. Specifically, *ARRANCA PAL CARAJO* incorporates a truncated sample taken directly from *Pounder* and, by extension, *Fish Market*, and begins at approximately 0:06-0:23, 0:24-0:35, 1:36-1:59, 2:03-2:23, 2:48-3:00, 3:32-3:38 and 3:42-3:54. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *ARRANCA PAL CARAJO*; with the additional pattern made up of recreated elements of the sampled pattern, which is then repeated throughout *ARRANCA PAL CARAJO* alternating with the sample. Additionally, the drum tracks in *ARRANCA PAL CARAJO* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare

drum pattern in *ARRANCA PAL CARAJO* is the same as Fish Market with its inclusion of the 3rd and 11th sixteenth beat in each bar. The synth tom in *ARRANCA PAL CARAJO* copies the pattern of the synth tom in *Pounder* and *Fish Market* played on beats 1 and 3 of every bar. Further, *ARRANCA PAL CARAJO* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in A*RRANCA PAL CARAJO* has the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

493. Specifically, *CONTIGO VOY A MUERTE* incorporates a truncated sample taken directly from *Pounder* and, by extension, *Fish Market*, and begins at approximately 0:23-0:33, 0:34-0:45, 1:01-1:23, 1:47-1:57, 2:13-2:24, 2:36-2:47 and 3:02-3:13. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *CONTIGO VOY A MUERTE*; with the additional pattern made up of recreated elements of the sampled pattern, which is then repeated throughout *CONTIGO VOY A MUERTE* alternating with the sample. Additionally, the drum tracks in *CONTIGO VOY A MUERTE* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *CONTIGO VOY A MUERTE* is the same as *Fish Market* with its inclusion of the 3rd and 11th sixteenth beat in each bar. The synth tom in *CONTIGO VOY A MUERTE* copies the pattern of the synth tom in *Pounder* and *Fish Market* played on beats 1 and 3 of every bar. Further, *CONTIGO VOY A MUERTE* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *CONTIGO VOY A MUERTE* has the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

494. Specifically, *EL MAKINON* incorporates a truncated sample taken directly from *Pounder* and, by extension, *Fish Market*, and begins at approximately 0:36-0:46 and 1:43-1:53. The 2 bars sample originated from *Pounder*. However, the

fundamental pattern in *Fish Market* is maintained and remains dominant throughout *EL MAKINON*; with the additional pattern made up of recreated elements of the sampled pattern, which is then repeated throughout *EL MAKINON* alternating with the sample. Additionally, the drum tracks in *EL MAKINON* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *EL MAKINON* is the same as *Fish Market* with its inclusion of the 3rd and 11th sixteenth beat in each bar. The synth tom in *EL MAKINON* copies the pattern of the synth tom in *Pounder* and *Fish Market* played on beats 1 and 3 of every bar. Further, *EL MAKINON* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *EL MAKINON* has the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

495. Specifically, *GATÚBELA* incorporates a sample taken directly from *Pounder* and, by extension, *Fish Market*. The sample is played at approximately 0:40-0:58 and is introduced at various other intervals throughout *GATÚBELA*. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *GATÚBELA*; with the additional pattern made up of recreated elements of the sampled pattern, which is then repeated throughout *GATÚBELA* alternating with the sample. *GATÚBELA* features a timbale roll from *Fish Market* at 1:20. Additionally, the drum tracks in *GATÚBELA* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *GATÚBELA* is the same as *Fish Market* with its inclusion of the 3rd and 11th sixteenth beat in each bar. *GATÚBELA* features a copy of the timbale 32nd beat roll at the end of each bar, and at 1:56, as in *Fish Market* and *Pounder*. The synth tom in *GATÚBELA* copies the pattern of the synth tom in *Pounder* and *Fish Market* played on beats 1 and 3 of every bar. Further, *GATÚBELA*

copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *GATÚBELA* has the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

496. Specifically, *LEYENDAS* incorporates a sample taken directly from *Pounder* and *Fish Market.* The sample is played at approximately 0:30, 1:40-2:00, 4:36-4:52, and is introduced at various other intervals throughout *LEYENDAS*. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *LEYENDAS*; with the additional pattern made up of recreated elements of the sampled pattern, which is then repeated throughout *LEYENDAS* alternating with the sample. Additionally, the drum tracks in *LEYENDAS* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *LEYENDAS* is the same as *Fish Market* with its inclusion of the 3rd and 11th sixteenth beat in each bar. *LEYENDAS* includes a timbale 32nd beat roll at the end of each bar that is unique to *Fish Market* and *Pounder* starting at 3:22-4:20 and 4:57-4:52. The synth tom in *LEYENDAS* copies the pattern of the synth tom in *Pounder* and *Fish Market*. Further, *LEYENDAS* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *LEYENDAS* has the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

497. Specifically, *ODISEA* incorporates a sample taken directly from *Pounder,* and by extension *Fish Market.* The sample is played at approximately 0:55-1:26, 1:38-1:46, 2:00-2:10, 2:22-2:32, 2:44-2:51 and 3:05-3:38. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *ODISEA*; with the additional pattern made up of recreated elements of the sampled pattern, which is then repeated throughout *ODISEA* alternating with the sample. Additionally, the drum tracks in

ODISEA feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *ODISEA* is the same as *Fish Market* with its inclusion of the 3rd and 11th sixteenth beat in each bar. The timbale pattern in *ODISEA* is the same as *Fish Market* and *Pounder*. The synth tom in *ODISEA* copies the pattern of the synth tom in *Pounder* and *Fish Market* played on beats 1 and 3 of every bar. Further, *ODISEA* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *ODISEA* has the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

498. Each of the Karol G Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

499. A comparison of *Fish Market* and each of the Karol G Works establishes that each of the Karol G Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Lenny Tavarez Allegations

500. As shown in the accompanying Exhibit A, Lenny Tavarez and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Fantasías, Fantasías Remix, Ímaginate, La Neta, La Pared 360, Lo Tengo Todo,* and *Me Enamora.*

501. Each of *Fantasías, Fantasías Remix, Ímaginate, La Neta, La Pared 360, Lo Tengo Todo,* and *Me Enamora* (collectively, the "Lenny Tavarez Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

502. Each of the Lenny Tavarez Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

503. A comparison of *Fish Market* and each of the Lenny Tavarez Works establishes that each of the Lenny Tavarez Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Los Legendarios Allegations

504. As shown in the accompanying Exhibit A, Los Legendarios and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Amanecer Contigo, Auto, Baila Conmigo, Dando Vueltas, En Mi Habitacion, Fiel, Fiel (Remix), Fugitivo, Ganas, Hagámoslo Otra Vez, Hey Shorty Remix, Huele A Sexo, Loco, Mami, Mari Mari, Me Dañas La Mente, Mi Niña, No Me Acostumbro, Prendelo,* and *Vamo Alla.*

505. Each of *Amanecer Contigo, Auto, Baila Conmigo, Dando Vueltas, En Mi Habitacion, Fiel, Fiel (Remix), Fugitivo, Ganas, Hagámoslo Otra Vez, Hey Shorty Remix, Huele A Sexo, Loco, Mami, Mari Mari, Me Dañas La Mente, Mi Niña, No Me Acostumbro, Prendelo,* and *Vamo Alla* (collectively, the "Los Legendarios Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

506. Each of the Los Legendarios Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

507. A comparison of *Fish Market* and each of the Los Legendarios Works establishes that each of the Los Legendarios Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition.

The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Major Lazer Allegations

508. As shown in the accompanying Exhibit A, Major Lazer and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Bam Bam*, *Buscando Huellas*, *Come On To Me*, *Diplomatico*, *Lean On*, *Light it Up*, *Make It Hot*, *Que Calor*, *QueLoQue*, *Sua Cara*, *Titans*, and *Watch Out for This (Bumaye)*.

509. Each of *Bam Bam*, *Buscando Huellas*, *Come On To Me*, *Diplomatico*, *Lean On*, *Light it Up*, *Make It Hot*, *Que Calor*, *QueLoQue*, *Sua Cara*, *Titans*, and *Watch Out for This (Bumaye)* (collectively, the "Major Lazer Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

510. Each of the Major Lazer Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

511. A comparison of *Fish Market* and each of the Major Lazer Works establishes that each of the Major Lazer Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Maluma Allegations

512. As shown in the accompanying Exhibit A, Maluma and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *11PM*, *ADMV (Versión Urbana)*, *Agua de Jamaica*, *Ansiedad*, *Bella-K*, *Booty*, *Borro Cassette*, *Chocolate*, *Cielo a un Diablo*, *Climax*, *Condena*, *Copas de Vino*, *Corazón*, *Correr el Riesgo*, *Cositas de la USA*, *Cuenta a Saldo*, *Cuidau*, *Déjale Saber*, *Delincuente*, *Dime Que Te Parece*, *Dispuesto*, *¿Dónde Estás?*,

Dos Amores, El Perdedor, El Préstamo, El Punto, El Tiki, Extrañándote, Farandulera, Felices los 4, Hangover, Happy Birthday, Hawái, HP, Instinto Natural, Intentalo, Intro, Magia, La Burbuja, La Cura, La Curiosidad, La Ex, La Flaca, La Intención, La Misma Moneda, La Vida es Bella, Loco, Luz Verde, Madrid, Mai Mai, Mal de Amores, Mala, Mala Mía, Malo, Me Acuerdo de Ti, Me Enamore de Ti, Me Gustas, Me Gustas Tanto, Miss Independent, Mojando Asientos, No Puedo Olvidarte, No Se Me Quita, Nos Comemos Vivos, Ojos Que No Ven, Obsesión, Parce, Pasarla Bien, Peligrosa, Perdón, Presiento, Pretextos, Quality, Recuérdame, Salida de Escape, Sexo Sin Titulo, Shhh "Calla", Sin Contrato, Sobrio, Solos, Soltera, Te Quiero Cerquita, Tsunami, Tu Cariño, Una Aventura, Vámonos de Fuga, Vete Vete, and *Ya No Es Niña*.

513. Each of *11PM, ADMV (Versión Urbana), Agua de Jamaica, Ansiedad, Bella-K, Booty, Borro Cassette, Chocolate, Cielo a un Diablo, Climax, Condena, Copas de Vino, Corazón, Correr el Riesgo, Cositas de la USA, Cuenta a Saldo, Cuidau, Déjale Saber, Delincuente, Dime Que Te Parece, Dispuesto, ¿Dónde Estás?, Dos Amores, El Perdedor, El Préstamo, El Punto, El Tiki, Extrañándote, Farandulera, Felices los 4, Hangover, Happy Birthday, Hawái, HP, Instinto Natural, Intentalo, Intro, Magia, La Burbuja, La Cura, La Curiosidad, La Ex, La Flaca, La Intención, La Misma Moneda, La Vida es Bella, Loco, Luz Verde, Madrid, Mai Mai, Mal de Amores, Mala, Mala Mía, Malo, Me Acuerdo de Ti, Me Enamore de Ti, Me Gustas, Me Gustas Tanto, Miss Independent, Mojando Asientos, No Puedo Olvidarte, No Se Me Quita, Nos Comemos Vivos, Ojos Que No Ven, Obsesión, Parce, Pasarla Bien, Peligrosa, Perdón, Presiento, Pretextos, Quality, Recuérdame, Salida de Escape, Sexo Sin Titulo, Shhh "Calla", Sin Contrato, Sobrio, Solos, Soltera, Te Quiero Cerquita, Tsunami, Tu Cariño, Una Aventura, Vámonos de Fuga, Vete Vete,* and *Ya No Es Niña* (collectively, the "Maluma Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

514. Specifically, *ADMV* copies elements of the *Fish Market* drum and bass patterns beginning at approximately 1:19. The *Fish Market* drum pattern is the primary pattern used throughout the duration of *ADMV* following the intro consisting of bed chords, vocals and an audio filtered loop containing elements of the *Fish Market* pattern at approximately 1:08-1:17. The drum tracks in *ADMV* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar, and an additional hi-hat pattern copying the tambourine pattern in *Fish Market*. The snare drum pattern in *Fish Market* is replaced in *ADMV* with rim shots that replicate the dominant snare pattern in *Fish Market.* However, the full snare pattern is captured with the hi-hat filling in the missing 3rd and 11th sixteenth beats matching the *Fish Market* snare pattern. Further, the bass line played in *ADMV* maintains a similar pattern with emphasis placed on beats 1 and 3 of each bar as the bass line in *Fish Market*. A similar sub frequency timbre is used for the bass in the same manner as in *Fish Market.*

515. Specifically, *Bella-K* copies elements of the *Fish Market* drum and bass patterns beginning at approximately 0:12. The *Bella-K* drum pattern is taken from the first two beats of a bar from the *Fish Market* pattern and may also contain an audio sample taken from *Pounder* at a similar location of two beats of a bar in the work. This pattern is the primary pattern used throughout the duration of *Bella-K.* The drum tracks in *Bella-K* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Bella-K* is the same as *Fish Market* with its signature inclusion of a 3rd and 11th sixteenth ghost note preceding the 4th *and 12th* sixteenth snare note in each bar. The synth tom plays on beats 1 and 3 copying the synth tom in *Fish Market* and *Pounder*. *Bella-K* features a copy of the timbale 32nd beat roll at the end of each bar as in *Pounder*. Further, the bass line played in *Bella-K* is

minimalistic and anchors on the root of the chords on beats one and three as in *Fish Market.* A similar sub frequency timbre is used for the bass in the same manner as in *Fish Market.*

516. Specifically, *Ansiedad* copies elements of the *Fish Market* drum pattern beginning at approximately 0:38. The drum pattern in *Ansiedad* is taken from the first two beats of a bar from the *Fish Market* pattern and may also contain an audio sample taken from *Pounder* at a similar location of two beats of a bar in the work. The drum tracks in *Ansiedad* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar, and an additional hi-hat pattern copying the tambourine pattern in *Fish Market*. The snare drum pattern in *Ansiedad* is the same as *Fish Market* with its signature inclusion of a 3rd and 11th sixteenth ghost note preceding the 4th *and* 12th sixteenth snare note in each bar. The synth tom plays on beats 1 and 3 copying the synth tom in *Fish Market* and *Pounder*. *Ansiedad* features a copy of the timbale 32nd beat roll at the end of each bar as in *Pounder*. Further, the bass line played in *Ansiedad* is minimalistic and anchors on the root of the chords on beats one and three as in *Fish Market.* A similar sub frequency timbre is used for the bass in the same manner as in *Fish Market.*

517. Specifically, *Booty* incorporates a sample from *Pounder*. The sample is introduced at approximately 0:12 and is mixed in throughout the work. The full 2 bar timbale pattern features a loop of a half of a bar segment taken from the *Pounder*. This constitutes the dominant loop repeated throughout the work. The use of the *Pounder* sample in *Booty* serves to introduce a copying of the patterns contained in *Fish Market.* The drum tracks in *Booty* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Booty* is the same as *Fish Market.* The synth tom plays on beats 1 and 3 copying the synth tom in *Fish Market* and *Pounder*

and copies the same synth tom sound found in *Pounder*. Further, the bass line played in *Booty* is minimalistic and anchors on the root of the chords on beats one and three as in *Fish Market*. A similar sub frequency timbre is used for the bass in the same manner as in *Fish Market*.

518. Specifically, *Cielo a un Diablo* incorporates a sample from *Pounder*. The sample is introduced at approximately 0:29 and is mixed in throughout the work. The full 2 bar timbale pattern features a loop of a half of a bar segment taken from the *Pounder*. This constitutes the dominant loop repeated throughout the work. The use of the *Pounder* sample in *Cielo a un Diable* serves to introduce a copying of the patterns contained in *Fish Market*. The drum tracks in *Cielo a un Diablo* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Cielo a un Diable* is the same as *Fish Market*. The synth tom plays on beats 1 and 3 copying the synth tom in *Fish Market* and *Pounder* and copies the same synth tom sound found in *Pounder*. The *Fish Market* signature timbale 32nd beats roll at the end of each bar, is also sampled in *Cielo a un Diable*. Further, the bass line played in *Cielo a un Diable* is minimalistic and anchors on the root of the chords on beats one and three as in *Fish Market*. A similar sub frequency timbre is used for the bass in the same manner as in *Fish Market*.

519. Specifically, *Copas de Vino* incorporates a sample from *Pounder*. The sample is introduced at approximately 0:31 and is mixed in throughout the work. The full 2 bar timbale pattern features a loop of a half of a bar segment taken from the *Pounder*. This constitutes the dominant loop repeated throughout the work. The use of the *Pounder* sample in *Copas de Vino* serves to introduce a copying of the patterns contained in *Fish Market*. The drum tracks in *Copas de Vino* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Copas de Vino*

is the same as *Fish Market.* The synth tom plays on beats 1 and 3 copying the synth tom in *Fish Market* and *Pounder* and copies the same synth tom sound found in *Pounder*. The *Fish Market* signature timbale 32nd beats roll at the end of each bar, is also copied in *Copas de Vino.* This can be heard at the end of every second bar of the loop; with the loop beginning at 0:31 through to 0:54 and at the end of every second bar throughout the work in which the same roll is played. Further, the bass line played in *Copas de Vino* is minimalistic and anchors on the root of the chords on beats one and three as in *Fish Market.*

520. Specifically, *El Perdedor* incorporates a sample from *Pounder*. The sample appears at approximately 0:06-0:17 and is re-introduced at approximately 1:18 and is mixed in and out throughout the duration of the work. The full 2 bar timbale pattern features a loop of a half of a bar segment taken from the *Pounder*. This constitutes the dominant loop repeated throughout the work. The use of the *Pounder* sample in *El Perdedor* serves to introduce a copying of the patterns contained in *Fish Market.* The drum tracks in *El Perdedor* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *El Perdedor* is the same as *Fish Market.* Further, the bass line played in *El Perdedor* is minimalistic and anchors on the root of the chords on beats one and three as in *Fish Market.* A similar sub frequency timbre is used for the bass in the same manner as in *Fish Market.*

521. Specifically, *Cositas de la USA* incorporates elements of the *Fish Market* drum pattern beginning at approximately 0:40 and may also contain an audio sample taken from *Pounder* featuring the full 2 bars pattern. The drum tracks in *Cositas de la USA* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Cositas de la USA* is the same as *Fish Market* with its

inclusion of a 3rd and 11th sixteenth ghost note preceding the 4th and 12th sixteenth snare note in each bar. The synth tom plays on beats 1 and 3 copying the pattern of the synth tom in *Fish Market* and *Pounder*. *Cositas de la USA* also features a copy of the timbale 32nd beat roll at the end of each bar as in *Pounder*. Further, the bass line played in *Cositas de la USA* is minimalistic and anchors on the root of the chords. A similar sub frequency timbre is used for the bass in the same manner as in *Fish Market*.

522. Specifically, *Extranandote* incorporates a sample from *Pounder*. The sample appears filtered at approximately 0:21-0:26 and is re-introduced unfiltered beginning at 0:32-0:40. The full 2 bar timbale pattern features a loop of a half of a bar segment taken from the *Pounder*. This constitutes the dominant loop repeated throughout the work. The use of the *Pounder* sample in *Extranandote* serves to introduce a copying of the patterns contained in *Fish Market*. The drum tracks in *Extranandote* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Extranandote* is the same as *Fish Market*. The synth tom in *Extranandote* plays on beats 1 and 3 copying the pattern from *Fish Market* and *Pounder*, and the sound of the synth tom in *Pounder*. Further, the bass line played in *Extranandote* is minimalistic and anchors on the root of the chords on beats one and three as in *Fish Market*. A similar sub frequency timbre is used for the bass in *Extranandote* as in *Fish Market*, but is also coupled with a lighter pop infused, mid frequency range boosted bass.

523. Specifically, *Felices los 4* incorporates elements of the *Fish Market* drum pattern beginning at approximately 1:17 and is the primary pattern used throuout the duration of the work. The drum tracks in *Felices los 4* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in

Felices los 4 is the same as *Fish Market* with its inclusion of a 3rd and 11th sixteenth ghost note preceding the 4th and 12th sixteenth snare note in each bar. The hi-hat also copies the tambourine pattern in *Fish Market.* The synth tom plays on beats 1 and 3 copying the pattern of the synth tom in *Fish Market* and *Pounder* and copies the synth tom sound from *Pounder*. Further, a similar sub frequency timbre is used for the bass in the same manner as in *Fish Market*

524. Specifically, *La Flaca* incorporates a sample from *Pounder* at 0:21-0:50, 1:02-1:32, 1:45-1:52 and 2:05-2:14. The sample appears intermittently throughout the duration of the work. The full 2 bar pattern is edited to a half of a bar segment taken from *Pounder*. of a half of a bar segment taken from the *Pounder*. This constitutes the dominant loop repeated throughout the work. The use of the *Pounder* sample in *La Flaca* serves to introduce a copying of the patterns contained in *Fish Market.* The drum tracks in *La Flaca* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *La Flaca* is the same as *Fish Market.* The synth tom in *La Flaca* plays on beats 1 and 3 copying the pattern from *Fish Market* and *Pounder*, and the sound of the synth tom in *Pounder*. Further, the bass line played in *La Flaca* is minimalistic and anchors on the root of the chords on beats one and three as in *Fish Market.* A similar sub frequency timbre is used for the bass in *La Flaca* as in *Fish Market,* but is also coupled with a lighter pop infused, mid frequency range boosted bass.

525. Specifically, *Madrid* incorporates a sample from *Pounder* at 0:23-0:56, 1:09-1:19, 1:23-1:40, 1:54-2:15, 2:27-2:49, and 3:01-3:12. The sample appears intermittently throughout the duration of the work. The full 2 bar pattern is edited to a half of a bar segment taken from *Pounder*. of a half of a bar segment taken from the *Pounder*. This constitutes the dominant loop repeated throughout the work. The use of the *Pounder* sample in *Madrid* serves to introduce a copying of the patterns

contained in *Fish Market.* The drum tracks in *Madrid* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Madrid* is the same as *Fish Market.* The synth tom in *Madrid* plays on beats 1 and 3 copying the pattern from *Fish Market* and *Pounder,* and the sound of the synth tom in *Pounder.* Further, the bass line played in *Madrid* is minimalistic and anchors on the root of the chords on beats one and three as in *Fish Market.* A similar sub frequency timbre is used for the bass in *Madrid* as in *Fish Market,* but is also coupled with a lighter pop infused, mid frequency range boosted bass.

526. Specifically, *Me Enamore de Ti* incorporates a full 2 bar sample from *Pounder* that is repeated throughout the work at the following intervals beginning at *0:11-0:20, and again at 1:02-1:12 and 2:24-2:34.* There is also a section of *Me Enamore de Ti* interspersed between these timestamps that features a truncated sample edited to a half of a bar and looped. The use of the *Pounder* sample in *Me Enamore de Ti* serves to introduce a copying of the patterns contained in *Fish Market.* The drum tracks in *Me Enamore de Ti* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Me Enamore de Ti* is the same as *Fish Market.* The synth tom in *Me Enamore de Ti* plays on beats 1 and 3 copying the pattern from *Fish Market* and *Pounder,* and the sound of the synth tom in *Pounder.* The timbale pattern is also copied and contained in the sampled sections. Further, the bass line played in *Me Enamore de Ti* is minimalistic and anchors on the root of the chords on beats one and three as in *Fish Market.* A similar sub frequency timbre is used for the bass in *Me Enamore de Ti* as in *Fish Market,* but is also coupled with a lighter pop infused, mid frequency range boosted bass.

527. Specifically, *Parce* incorporates elements of the *Fish Market* drum pattern beginning at approximately 0:47. The pattern is introduced throughout the

duration of the work, infused with a truncated version of the *Fish Market* intro drum roll and elements of the pattern with sounds replaced. A conga drum fills in for the timbales in *Fish Market* with the signature 32nd beats roll maintained in the pattern. The *Fish Market* pattern constitutes the dominant loop repeated throughout the work. The drum tracks in *Parce* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Parce* is the same as *Fish Market* with its inclusion of the pattern's second and sixth 8th note snare beat in each bar. The synth tom plays on beats 1 and 3 copying the pattern of the synth tom in *Fish Market* and *Pounder*, and copies the synth tom sound from *Pounder*. Further, a similar sub frequency timbre is used for the bass in the same manner as in *Fish Market*

528. Specifically, *Shhh "Calla"* incorporates an audio sample taken from *Pounder* at 1:59-2:15. The track also consists of replayed elements of *Fish Market's* drum pattern which constitutes the dominant loop repeated throughout the work. The use of the *Pounder* sample in *Shhh "Calla"* serves to introduce a copying of the patterns contained in *Fish Market*. Further, the bass line played in *Shhh "Calla"* is minimalistic and anchors on the root of the chords on beats one and three as in *Fish Market*. A similar sub frequency timbre is used for the bass in *Shhh "Calla"* as in *Fish Market*.

529. Specifically, *Sin Contrato* incorporates a sample from *Pounder* at 1:18-1:52, 2:05-2:15, 2:18-2:55, 3:18-3:35, and 3:38-3:55. The full 2 bar pattern is truncated to a half a bar segment. The truncated element constitutes the dominant loop repeated throughout the work with its signature second bar timbale pattern. The use of the *Pounder* sample in *Sin Contrato* serves to introduce a copying of the patterns contained in *Fish Market*. The drum tracks in *Sin Contrato* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in

Sin Contrato is the same as *Fish Market.* The synth tom in *Sin Contrato* plays on beats 1 and 3 copying the pattern from *Fish Market* and *Pounder*, and the sound of the synth tom in *Pounder*. Further, a similar sub frequency timbre is used for the bass in *Sin Contrato* as in *Fish Market*

530. Each of the Maluma Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

531. A comparison of *Fish Market* and each of the Maluma Works establishes that each of the Maluma Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Manuel Turizo Allegations

532. As shown in the accompanying Exhibit A, Manuel Turizo and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Ahora Eh, Amor En Coma, Antes Que Te Vayas, Baila Conmigo, Bailemos, Caso Perdido, Cosas Malas, Esclavo De Tus Besos, Esperandote, Kayak, La Nota, Mala Costumbre, Nada Ha Cambiado, No Digas Que Te Vas, No Le Perteneces, No Me Conoce, Quiéreme Mientras Se Pueda, Sola, Ser un cantante, Sábanas Desordenadas, Te Falló, Te Olvido, Te Pido Perdón, Te Quemaste, Tiempo, Una Lady Como Tú*, and *Vámonos*.

533. Each of *Ahora Eh, Amor En Coma, Antes Que Te Vayas, Baila Conmigo, Bailemos, Caso Perdido, Cosas Malas, Esclavo De Tus Besos, Esperandote, Kayak, La Nota, Mala Costumbre, Nada Ha Cambiado, No Digas Que Te Vas, No Le Perteneces, No Me Conoce, Quiéreme Mientras Se Pueda, Sola, Ser un cantante, Sábanas Desordenadas, Te Falló, Te Olvido, Te Pido Perdón, Te Quemaste, Tiempo, Una Lady Como Tú*, and *Vámonos* (collectively, the "Manuel

Turizo Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

534. Each of the Manuel Turizo Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

535. A comparison of *Fish Market* and each of the Manuel Turizo Works establishes that each of the Manuel Turizo Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Myke Towers Allegations

536. As shown in the accompanying Exhibit A, Myke Towers and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Almas Gemelas*, *Ande Con Quien Ande*, *Bailame Así*, *BANDIDO*, *Cuando Bebe*, *EXPLICITO*, *Fantasia Sexual*, *Funeral*, *Girl*, *Hechizo*, *Inocente*, *Luces de Neon*, *Mayor*, *Otro*, *Pa' La Pared*, *Parcerita*, *Piensan*, *Relación Rota*, *Rutina*, *Si Se Da Remix*, *Si Se Da*, *Tiene Que Saber*, and *Viral*.

537. Each of *Almas Gemelas*, *Ande Con Quien Ande*, *Bailame Así*, *BANDIDO*, *Cuando Bebe*, *EXPLICITO*, *Fantasia Sexual*, *Funeral*, *Girl*, *Hechizo*, *Inocente*, *Luces de Neon*, *Mayor*, *Otro*, *Pa' La Pared*, *Parcerita*, *Piensan*, *Relación Rota*, *Rutina*, *Si Se Da Remix*, *Si Se Da*, *Tiene Que Saber*, and *Viral* (collectively, the "Myke Towers Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

538. Each of the Myke Towers Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

539. A comparison of *Fish Market* and each of the Myke Towers Works establishes that each of the Myke Towers Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Natti Natasha Allegations

540. As shown in the accompanying Exhibit A, Natti Natasha and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Antes Que Salga El Sol, Arrebatá, Criminal, Deja Tus Besos (Remix), Despacio, Devórame, Eleven, Era Necesario, Frozen, Fue Tu Culpa, Imposible Amor, Lamento Tu Pérdida, Las Nenas, No Quiero Saber, Oh Daddy, Me Felicito, Me Gusta, Me Gusta (Remix), Pa' Mala YO, Philliecito, Que Mal Te Fue, Que Mal Te Fue (Remix), Ram Pam Pam, Show Off, Te lo Dije*, and *Toca Toca*.

541. Each of *Antes Que Salga El Sol, Arrebatá, Criminal, Deja Tus Besos (Remix), Despacio, Devórame, Eleven, Era Necesario, Frozen, Fue Tu Culpa, Imposible Amor, Lamento Tu Pérdida, Las Nenas, No Quiero Saber, Oh Daddy, Me Felicito, Me Gusta, Me Gusta (Remix), Pa' Mala YO, Philliecito, Que Mal Te Fue, Que Mal Te Fue (Remix), Ram Pam Pam, Show Off, Te lo Dije*, and *Toca Toca* (collectively, the "Natti Natasha Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

542. Specifically, *Criminal* incorporates a truncated sample taken directly from *Pounder* and *Fish Market*, and is introduced at approximately 1:08-1:31, 1:44-2:07, 2:20-2:31, 2:56-3:05, 3:20-3:43, and 3:56-4:20. The 2 bars sample originated from *Pounder*. *Criminal* also features a drum pattern sampled from the Steely and Clevie composition, *Saddest Day* by Wayne Wonder, occurring at 0:56-1:07, 1:32-1:43, 2:08-2:19, 2:32-2:44, 3:07-3:19, and 3:44-3:55.

543. Specifically, *Deja Tus Besos (Remix)* incorporates a truncated sample taken directly from *Pounder* and *Fish Market*, and is introduced at approximately 0:46-0:54, 1:09-1:17, 143-1:51, 2:06-2:14 and 2:52-3:00. The 2 bars sample originated from *Pounder*.

544. Specifically, *Ram Pam Pam* incorporates a truncated sample taken directly from *Pounder* and *Fish Market*, and is introduced at approximately 0:39-0:47, 1:29-1:38, 1:58-1 2:07, 2:28-2:37, and 3:08-3:15. The 2 bars sample originated from *Pounder*. *Ram Pam Pam* uses elements of the fundamental drum pattern in *Fish Market*.

545. Each of the Natti Natasha Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

546. A comparison of *Fish Market* and each of the Natti Natasha Works establishes that each of the Natti Natasha Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Nicky Jam Allegations

547. As shown in the accompanying Exhibit A, Nicky Jam and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Adicto, Atrévete, Baby, Borracho, Buscarte, Calor, Cambiar la Rutina, Celosa, Chambonea, Clavo, Como Te Llamas, Come y Te Vas, Como Tu Me Pisas, Cuando Apague La Luz, Cuando Quieras, Cuerpo de Campeona, Cuerpo Mortal, Curiosidad, Dale, Dale Mami Pégate, Dándote, Descontrol, Desesperau, Desilucionao, Despacio, Despedida, Destino, Dile A Tu Amiga, Dime Si Piensas en Mi, DM, El Amante, El Desorden, El Perdon, En La Cama, Eres Tu, Estrella, Fan de Tus Fotos, Fiel a Tu Piel, Filoteao, Gas Pela, Gata Salvaje, Gatas*

En La Disco, Hasta Bajo, Hasta El Amanecer, I Can't Forget You, I Love You, I'm Not Your Husband / Tu Marido, Interlude (7) Salón de La Fama, Interlude (14) Salón de La Fama, Intro (featuring Daddy Yankee, Polaco, Falo) [Haciendo Escante], Intro - Salón de La Fama, Jaleo, Juegos Prohibidos, La Combi, La Gata, La Paga, La Promesa (La Calle), La Toco, La Vamos a Montar, Loco, Magnum, Mango Piña, Maniquí, Me Estoy Muriendo, Me voy pal party, My Baby, Mi Estilo Predomino, Mi Gente Tiene Que Bailar, Mi Maldición, Miami, Mil Lagrimas, Muchos Pensaron Que The Cream Se Acabo, Muévelo, Nadie Como Tú, Ni Sé, No Hay Nadie Más, No Te Puedo Olvidar, No Te Vayas, Noche De Acción, Nos Fuimos, Novia Nueva, Panty, Pasado, Pelean Por Fama, Perdóname, Piensas En Mi, Pikete, Playa, Polvo, Por El Momento, Quedate Con El, Quiero Estar Contigo, Quisieras, Sacando Chispa, Se Dé Y Se Da, Se Te Acuerdas La Primera Vez, Si Te Metes Conmigo, Si Tú Guayas, Si Tú La Ves, Si Tu No Estas, Si Yo Fuera Tu Hombre, Sigo Potente, Siguen Haciendo Ruido [Remix], Sin Filtro, Sin Novia, Suelta, Superhéroe, Te Hace Falta, Te Haces La Difícil, Te Invito, Te Quiero Tocar, Te Robarè, Tequila, Tienen El Control, Tienes Que Ser Mia, Tócate, Ton Ton Ton, Tragatela, Trankila, Travesuras, Tú, Tu Cuerpo En La Cama, Tu Cuerpo Me Ama, Tu Hombre, Tu Primera Vez, Tú y Tu Flow, Tus Ojos, Un Sueño, Una Guayaa, Va Pasando el Tiempo, Vamos A Perrear, Ve y Dile (No Llores), Vive Contigo, Voy a Beber, Whine Up, Y Las Gatas, Ya No Me Llamas, Yo Tengo Algo, Yo No Sé Que Esperas Tú, and *Yo No Soy Tu Marido*.

548. Each of *Adicto, Atrévete, Baby, Borracho, Buscarte, Calor, Cambiar la Rutina, Celosa, Chambonea, Clavo, Como Te Llamas, Come y Te Vas, Como Tu Me Pisas, Cuando Apague La Luz, Cuando Quieras, Cuerpo de Campeona, Cuerpo Mortal, Curiosidad, Dale, Dale Mami Pégate, Dándote, Descontrol, Desesperau, Desilucionao, Despacio, Despedida, Destino, Dile A Tu Amiga, Dime Si Piensas en Mi, DM, El Amante, El Desorden, El Perdon, En La Cama, Eres Tu, Estrella, Fan de Tus Fotos, Fiel a Tu Piel, Filoteao, Gas Pela, Gata Salvaje, Gatas En La Disco,*

Hasta Bajo, Hasta El Amanecer, I Can't Forget You, I Love You, I'm Not Your Husband / Tu Marido, Interlude (7) Salón de La Fama, Interlude (14) Salón de La Fama, Intro (featuring Daddy Yankee, Polaco, Falo) [Haciendo Escante], Intro - Salón de La Fama, Jaleo, Juegos Prohibidos, La Combi, La Gata, La Paga, La Promesa (La Calle), La Toco, La Vamos a Montar, Loco, Magnum, Mango Piña, Maniquí, Me Estoy Muriendo, Me voy pal party, My Baby, Mi Estilo Predomino, Mi Gente Tiene Que Bailar, Mi Maldición, Miami, Mil Lagrimas, Muchos Pensaron Que The Cream Se Acabo, Muévelo, Nadie Como Tú, Ni Sé, No Hay Nadie Más, No Te Puedo Olvidar, No Te Vayas, Noche De Acción, Nos Fuimos, Novia Nueva, Panty, Pasado, Pelean Por Fama, Perdóname, Piensas En Mi, Pikete, Playa, Polvo, Por El Momento, Quedate Con El, Quiero Estar Contigo, Quisieras, Sacando Chispa, Se Dé Y Se Da, Se Te Acuerdas La Primera Vez, Si Te Metes Conmigo, Si Tú Guayas, Si Tú La Ves, Si Tu No Estas, Si Yo Fuera Tu Hombre, Sigo Potente, Siguen Haciendo Ruido [Remix], Sin Filtro, Sin Novia, Suelta, Superhéroe, Te Hace Falta, Te Haces La Difícil, Te Invito, Te Quiero Tocar, Te Robarè, Tequila, Tienen El Control, Tienes Que Ser Mia, Tócate, Ton Ton Ton, Tragatela, Trankila, Travesuras, Tú, Tu Cuerpo En La Cama, Tu Cuerpo Me Ama, Tu Hombre, Tu Primera Vez, Tú y Tu Flow, Tus Ojos, Un Sueño, Una Guayaa, Va Pasando el Tiempo, Vamos A Perrear, Ve y Dile (No Llores), Vive Contigo, Voy a Beber, Whine Up, Y Las Gatas, Ya No Me Llamas, Yo Tengo Algo, Yo No Sé Que Esperas Tú, and *Yo No Soy Tu Marido* (collectively, the "Nicky Jam Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

549. Specifically, *Te Robaré* incorporates a sample taken directly from *Pounder* and is introduced at approximately 0:33 and is looped at various intervals throughout *Te Robaré*. *Te Robaré* copies the fundamental drum patterns in *Fish Market* and is looped throughout most of the work. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and

remains dominant throughout *Te Robaré*. Additionally, the drum tracks in *Te Robaré* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Te Robaré* is the same snare drum in *Fish Market.* The timbale in *Te Robaré* copies elements of the timbale pattern in *Fish Market* and *Pounder*. The synth tom in *Te Robaré* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Te Robaré* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Te Robaré* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

550. Specifically, *Fan de Tus Fotos* incorporates a sample taken directly from *Pounder* and *Fish Market*, and is introduced at approximately 0:28-1:01, 1:13-1:35, 1:58-2:09, and 2:59-3:10 and is looped at various intervals throughout *Fan de Tus Fotos*. *Fan de Tus Fotos* also features a drum pattern sampled from the Steely and Clevie composition, *Saddest Day* by Wayne Wonder, occurring at 1:36-1:46. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Fan de Tus Fotos*. Additionally, the drum tracks in *Fan de Tus Fotos* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Fan de Tus Fotos* is the same snare drum in *Fish Market.* The timbale in *Fan de Tus Fotos* copies the timbale pattern in *Pounder*. The synth tom in *Fan de Tus Fotos* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Fan de Tus Fotos* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Fan de Tus Fotos* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

551. Specifically, *Magnum* incorporates a truncated sample taken directly from *Pounder* and *Fish Market*, and is introduced at approximately 1:21-1:27, 1:29-1:39, 2:00-2:09, and 2:20-2:28 and is looped at various intervals throughout *Magnum*. *Magnum* also samples the drum pattern from *Pounder* occurring at 2:41-3:00. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Magnum*. Additionally, the drum tracks in *Magnum* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Magnum* is the same snare drum in *Fish Market.* The timbale in *Magnum* copies the timbale pattern in *Pounder*. The synth tom in *Magnum* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Magnum* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Magnum* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

552. Specifically, *Se Dé Y Se Da* incorporates a truncated sample taken directly from *Pounder* and *Fish Market*, and is introduced at approximately 0:31 and is looped at various intervals throughout *Se Dé Y Se Da*. *Se Dé Y Se Da* copies the fundamental drum pattern from *Fish Market* and is looped at various other intervals throughout *Se Dé Y Se Da*. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Se Dé Y Se Da*. Additionally, the drum tracks in *Se Dé Y Se Da* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Se Dé Y Se Da* is the same snare drum in *Fish Market.* The timbale in *Se Dé Y Se Da* copies elements of the timbale pattern in *Fish Market* and *Pounder*. The synth tom in *Se Dé Y Se Da* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Se Dé Y Se Da* copies *Fish Market*'s bass pattern which

anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Se Dé Y Se Da* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

553. Specifically, *Hace Falta* incorporates a sample taken directly from *Pounder* and is introduced at approximately 0:31 and is looped at various intervals throughout *Hace Falta*. *Hace Falta* copies the fundamental drum pattern from *Fish Market* and is looped at various other intervals throughout *Hace Falta*. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Hace Falta*. Additionally, the drum tracks in *Hace Falta* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Hace Falta* is the same snare drum in *Fish Market.* The timbale in *Hace Falta* copies the timbale pattern and *Pounder*, including the iconic 32nd beats 'burst' roll at 0:34, 0:39, 0:45, 0:50, 1:01, and 1:11. The synth tom in *Hace Falta* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Hace Falta* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Hace Falta* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

554. Each of the Nicky Jam Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

555. A comparison of *Fish Market* and each of the Nicky Jam Works establishes that each of the Nicky Jam Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

<u>Ozuna Allegations</u>

556. As shown in the accompanying Exhibit A, Ozuna and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *A Escondidas, Apretaito, Aunque Me Porté Mal, BAILA BAILA BAILA, Baila Baila Baila (Remix), Bebe, Besos Mojados, Cama Vacía, Cambio, Caramelo, Caramelo Remix, Coméntale, Contigo Lo Tengo Todo, CORAZON DE SEDA, Cumpleaños, Danzau, DEPRIMIDA, Despeinada, Devuélveme, Dialogue Con Mi Corazón, Dicen, Difícil Olvidar, Dile Que Tu Me Quieres, Egoísta, El desorden, El Proceso, El Reggaetón, En Otro Mundo, Enemigos Ocultos, Eres Top, Escape, Este Loko, Esto No Acaba, Falsa Mentiras, Fanática, Fantasía, Fuego, Gistro Amarillo, Háblale (Remix), Hablale, Haciéndolo, Hasta Que Salga el Sol, Hola, Humo y Alcohol, Ibiza, Igual Como Tú, Independiente, Infidelidad, Juegos De Amor, La Modelo, Linda Y Asicala, Llegó la Navidad, Luce Bien, Luz Apaga, Mai Que Locura, Mala, Me Dijeron, Mi Niña, Mírame, Muito Calor, No la Mires, No Me Heches La Culpa, No Quiere Enamorarse, No Quiere Enamorarse (Remix), No Se Da Cuenta, No Se Que Tienes, Noches de Aventura, One Dance Remix, Pégate, Que Bien Te Ves, Qué Tú Esperas, Quiero Mas, Reggaeton en Paris, Se Porta Mal, Se Preparo, Se Suelta Sola, Se Toca Todita, Si Te Dejas Llevar, Si Tu Marido No Te Quiere, Si Tu Marido No Te Quiere (Remix), Síguelo Bailando, Sígueme Los Pasos, SIMPLE, Sin Ti Estoy Mejor, Sincero, Supuestamente, Te Paso A Buscar, Te Soñé De Nuevo, TIEMPO, Tu Foto, Tu Olor, Un Bellaqueo, Una Locura, Única, Única (Remix), Vacía Sin Mí, Vaina Loca, Ya No Estoy Pa Ti*, and *Yo Tengo Una Gata*.

557. Each of *A Escondidas, Apretaito, Aunque Me Porté Mal, BAILA BAILA BAILA, Baila Baila Baila (Remix), Bebe, Besos Mojados, Cama Vacía, Cambio, Caramelo, Caramelo Remix, Coméntale, Contigo Lo Tengo Todo, CORAZON DE SEDA, Cumpleaños, Danzau, DEPRIMIDA, Despeinada, Devuélveme, Dialogue Con Mi Corazón, Dicen, Difícil Olvidar, Dile Que Tu Me Quieres, Egoísta, El desorden, El Proceso, El Reggaetón, En Otro Mundo, Enemigos Ocultos, Eres Top, Escape,*

Este Loko, Esto No Acaba, Falsa Mentiras, Fanática, Fantasía, Fuego, Gistro Amarillo, Háblale (Remix), Hablale, Haciéndolo, Hasta Que Salga el Sol, Hola, Humo y Alcohol, Ibiza, Igual Como Tú, Independiente, Infidelidad, Juegos De Amor, La Modelo, Linda Y Asicala, Llegó la Navidad, Luce Bien, Luz Apaga, Mai Que Locura, Mala, Me Dijeron, Mi Niña, Mírame, Muito Calor, No la Mires, No Me Heches La Culpa, No Quiere Enamorarse, No Quiere Enamorarse (Remix), No Se Da Cuenta, No Se Que Tienes, Noches de Aventura, One Dance Remix, Pégate, Que Bien Te Ves, Qué Tú Esperas, Quiero Mas, Reggaeton en Paris, Se Porta Mal, Se Preparo, Se Suelta Sola, Se Toca Todita, Si Te Dejas Llevar, Si Tu Marido No Te Quiere, Si Tu Marido No Te Quiere (Remix), Síguelo Bailando, Sígueme Los Pasos, SIMPLE, Sin Ti Estoy Mejor, Sincero, Supuestamente, Te Paso A Buscar, Te Soñé De Nuevo, TIEMPO, Tu Foto, Tu Olor, Un Bellaqueo, Una Locura, Única, Única (Remix), Vacía Sin Mí, Vaina Loca, Ya No Estoy Pa Ti, and *Yo Tengo Una Gata* (collectively, the "Ozuna Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

558. Specifically, *Este Loko* incorporates a truncated sample of the introduction drum roll taken directly from *Pounder* and *Fish Market* and is introduced at approximately 1:20 and 2:19. The fundamental drum and bass pattern is introduced at 0:34-1:06, 1:21-2:05, and 2:20-3:13 and is looped at various other intervals throughout *Este Loko*. The 2 bars sample and pattern originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Este Loko*. Additionally, the drum tracks in *Este Loko* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Este Loko* is the same as *Fish Market.* The synth tom in *Este Loko* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Este Loko* copies *Fish Market*'s bass pattern which anchors the

root of the chords on beats 1 and 3. The timbre of the bass in *Este Loko* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

559. Specifically, *Me Dijeron* incorporates a truncated sample of the taken directly from *Pounder* and, by extension, *Fish Market.* The fundamental drum and bass pattern is introduced at approximately 0:40-1:21, 1:31-1:41, 1:49-2:11, and 2:53-3:23 and is looped at various other intervals throughout *Me Dijeron*. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Me Dijeron*. Additionally, the drum tracks in *Me Dijeron* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Me Dijeron* is the same as *Fish Market.* The synth tom in *Me Dijeron* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. The definitive timbale 32nd beats burst roll on the last 8th note at the end of each bar in *Pounder* is copied at 1:21-1:31, 2:12-2:22 and 3:23-3:33. Further, *Me Dijeron* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Me Dijeron* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

560. Specifically, *Mi Niña* copies elements of the *Fish Market* drum pattern throughout the work. The elements can be heard at approximately 0:57-1:29, 2:06-2:27, 2:51-3:01, and 3:14-3:23. Additionally, the drum tracks in *Mi Niña* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Mi Niña* copies the fundamental snare drum in *Fish Market.* The synth tom in *Mi Niña* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Mi Niña* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Mi Niña* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

561. Specifically, *No Se Da Cuenta* copies elements of the *Fish Market* and *Pounder* drum pattern throughout the work. The elements can be heard at approximately 0:46 through to 1:17 and continuing at 1:28-1:38, 1:51-1:59, 2:20-2:41, 2:52-3:22, and 3:33-4:04. The fundamental pattern in *Fish Market* is maintained and remains dominant throughout *No Se Da Cuenta*. Additionally, the drum tracks in *No Se Da Cuenta* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *No Se Da Cuenta* copies the fundamental snare drum in *Fish Market.* The synth tom in *No Se Da Cuenta* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *No Se Da Cuenta* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *No Se Da Cuenta* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

562. Specifically, *Pasión y Deseo* copies elements of the *Fish Market* and *Pounder* drum pattern that is introduced at approximately 0:47 and can be heard throughout the work. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Pasión y Deseo*. Additionally, the drum tracks in *Pasión y Deseo* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Pasión y Deseo* copies the fundamental snare drum in *Fish Market.* The synth tom in *Pasión y Deseo* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Pasión y Deseo* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Pasión y Deseo* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

563. Specifically, *Que Tú Esperas* copies elements of the *Fish Market* drum pattern that is introduced at approximately 0:22-1:34, 1:46-2:38, and 2:59-3:29 and can be heard throughout the work. *Que Tú Esperas* features a sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Que Tú Esperas*. Additionally, the drum tracks in *Que Tú Esperas* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Que Tú Esperas* copies the fundamental snare drum in *Fish Market.* The timbale in *Que Tú Esperas* copies elements of the timbale pattern and sound in *Fish Market* and *Pounder*. The synth tom in *Que Tú Esperas* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Que Tú Esperas* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Que Tú Esperas* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

564. Specifically, *Quiero Mas* incorporates a sample taken directly from *Pounder*, and is introduced at approximately 1:09-1:28, 1:50-1:59, 2:10-2:28, 3:48-3:57, 4:11-4:30, and 5:02-5:09. *Quiero Mas* copies the fundamental drum pattern from *Fish Market* and is looped at various other intervals throughout *Quiero Mas*. The patterns and 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Quiero Mas*. Additionally, the drum tracks in *Quiero Mas* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Quiero Mas* is the same snare drum in *Fish Market.* The timbale in *Quiero Mas* copies the timbale pattern in *Fish Market* and *Pounder*. The synth tom in *Quiero Mas* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Quiero Mas* copies *Fish Market*'s bass pattern which anchors the root of the chords

on beats 1 and 3. The timbre of the bass in *Quiero Mas* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

565. Specifically, *Se Porta Mal* incorporates a sample taken directly from *Pounder*, and is introduced at approximately 0:31-0:40, 0:52-1:02, 1:13-1:32,1:44-1:54 and 2:26-2:36. *Se Porta Mal* copies the fundamental drum and bass patterns from *Fish Market* and is looped at various other intervals throughout *Se Porta Mal*. The patterns and 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Se Porta Mal*. Additionally, the drum tracks in *Se Porta Mal* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Se Porta Mal* is the same snare drum in *Fish Market.* The timbale in *Se Porta Mal* is the same timbale pattern in *Fish Market* and *Pounder*. The synth tom in *Se Porta Mal* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Se Porta Mal* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Se Porta Mal* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

566. Specifically, *Se Preparó* incorporates a truncated sample taken directly from *Pounder* and *Fish Market*, and is introduced at approximately 1:02-1:22, 1:36-1:43, 1:47-2:18, 2:32-2:53, 3:05-3:16, and 3:28-3:39 and is looped at various other intervals throughout *Se Preparó*. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Se Preparó*. Additionally, the drum tracks in *Se Preparó* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Se Preparó* is the same snare drum in *Fish Market.* The timbale in *Se Preparó* copies elements of the timbale pattern in *Fish Market* and *Pounder*. The synth tom in

Se Preparó copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Se Preparó* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Se Preparó* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

567. Specifically, *SIMPLE* incorporates a truncated sample taken directly from *Pounder* and *Fish Market*, and is introduced at approximately1 0:33-0:43, 0:45-0:54, 1:07-1:40, 1:42-1:51, 1:53-2:03, 2:16-2:37, 2:39-2:49, 2:50-3:00, 3:02-3:11, and 3:13-3:23 and is looped at various other intervals throughout *SIMPLE*. *SIMPLE* copies the fundamental drum and bass patterns from *Fish Market* and is looped at various other intervals throughout *SIMPLE*. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *SIMPLE*. Additionally, the drum tracks in *SIMPLE* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *SIMPLE* is the same snare drum in *Fish Market.* The timbale in *SIMPLE* copies elements of the timbale pattern in *Fish Market* and *Pounder*. The synth tom in *SIMPLE* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *SIMPLE* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *SIMPLE* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

568. Specifically, *Sincero* incorporates a truncated sample taken directly from *Pounder* and *Fish Market* and is looped at various other intervals throughout *Sincero*. *Sincero* copies the fundamental drum pattern from *Pounder* and is looped at various other intervals throughout *Sincero.* The patterns and 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Sincero*. Additionally, the drum tracks in *Sincero*

feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Sincero* is the same snare drum in *Fish Market.* The timbale in *Sincero* copies elements of the timbale pattern in *Fish Market* and *Pounder*. The synth tom in *Sincero* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Sincero* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Sincero* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder.*

569. Specifically, *Supuestamente* incorporates a truncated sample taken directly from *Pounder* and *Fish Market*, and is introduced at approximately 0:21-0:32, 0:43-1:04, 1:17-2:12, and 2:23-3:18 and is looped at various other intervals throughout *Supuestamente.* The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Supuestamente*. *Supuestamente* copies the fundamental drum and bass patterns in *Fish Market* and is looped throughout most of the work. Additionally, the drum tracks in *Supuestamente* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Supuestamente* is the same snare drum in *Fish Market.* The timbale in *Supuestamente* copies elements of the timbale pattern in *Fish Market* and *Pounder*. The synth tom in *Supuestamente* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Supuestamente* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Supuestamente* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder.*

570. Specifically, *Te Soñé De Nuevo* incorporates a truncated sample taken directly from *Pounder* and *Fish Market*, and is introduced at approximately 0:23-0:33, 0:46-0:56,1:08-1:19,1:20-1:30, 1:34- 1:45, 2:08-2:18, 2:20-2:29, and 2:54-3:05

and is looped at various other intervals throughout *Te Soñé De Nuevo*. The unlisted time gaps feature a pattern variation taken from another Steely and Clevie composition entitled *Young Lover* starting at 0:34-0:45, 0:57-1:07, 1:46-1:56, and 3:06-3:18. *Te Soñé De Nuevo* copies the fundamental drum and bass patterns in *Fish Market* and is looped throughout most of the work. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* and *Young Lover* is maintained and remains dominant throughout *Te Soñé De Nuevo*. Additionally, the drum tracks in *Te Soñé De Nuevo* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Te Soñé De Nuevo* is the same snare drum in *Fish Market.* The timbale in *Te Soñé De Nuevo* copies elements of the timbale pattern in *Fish Market* and *Pounder*. The synth tom in *Te Soñé De Nuevo* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Te Soñé De Nuevo* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Te Soñé De Nuevo* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

571. Specifically, *Tu Foto* incorporates a truncated sample taken directly from *Pounder* and *Fish Market*, and is introduced at approximately 1:38-1:48, 2:01-2:10, 2:33-2:43, 2:55-3:05 and 3:27-3:37 and is looped at various other intervals throughout *Tu Foto*. *Tu Foto* copies the fundamental drum and bass patterns in *Fish Market* and is looped throughout most of the work. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Tu Foto*. Additionally, the drum tracks in *Tu Foto* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Tu Foto* is the same snare drum in *Fish Market.* The timbale in *Tu Foto* copies elements of the timbale pattern in *Fish Market* and *Pounder*. The synth tom in

Tu Foto copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Tu Foto* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Tu Foto* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

572. Specifically, *Única* incorporates a truncated sample taken directly from *Pounder* and *Fish Market*, and is introduced at approximately 0:04-0:07, 0:17-0:22, 0:56-1:16, 1:29-1:50, 2:13-2:56, 3:08-3:29, and 3:41-3:51 and is looped at various other intervals throughout *Única*. The unlisted time gaps feature a pattern variation taken from another Steely and Clevie composition entitled *Young Lover* starting at 1:21-1:28, 1:51-2:02, 3:33-3:40, and 3:55-4:02. *Única* copies the fundamental drum and bass patterns in *Fish Market* and is looped throughout most of the work. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* and *Young Lover* is maintained and remains dominant throughout *Única*. Additionally, the drum tracks in *Única* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Única* is the same snare drum in *Fish Market.* The timbale in *Única* copies elements of the timbale pattern in *Fish Market* and *Pounder*. The synth tom in *Única* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Única* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Única* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

573. Specifically, *Única (Remix)* incorporates a truncated sample taken directly from *Pounder* and *Fish Market*, and is introduced at approximately 0:22-0:42, 0:55-1:16, 1:28-1:49, 2:01-2:21, 2:23-2:33, 2:34-2:44, 2:56-3:17and is looped at various other intervals throughout *Única (Remix)*. The unlisted time gaps feature a pattern variation taken from another Steely and Clevie composition entitled *Young*

Lover starting at 1:21-1:28, 1:51-2:02, 3:33-3:40, and 3:55-4:02. *Única (Remix)* copies the fundamental drum and bass patterns in *Fish Market* and is looped throughout most of the work. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* and *Young Lover* is maintained and remains dominant throughout *Única (Remix)*. Additionally, the drum tracks in *Única (Remix)* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Única (Remix)* is the same snare drum in *Fish Market.* The timbale in *Única (Remix)* copies elements of the timbale pattern in *Fish Market* and *Pounder*. The synth tom in *Única (Remix)* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Única (Remix)* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Única (Remix)* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

574. Specifically, *Vaina Loca* incorporates a truncated sample taken directly from *Pounder* and *Fish Market*, and is introduced at approximately 1:15-1:35, 1:46-2:01, 2:07-2:26, 2:37-2:46, 2:57-3:07, and 3:18-3:27 and is looped at various other intervals throughout *Vaina Loca*. The unlisted time gaps feature a pattern variation taken from other Steely and Clevie Dancehall patterns starting at 1:05-1:13, 1:36-1:45, 2:02-2:06, 2:27-2:36, 2:47-2:56, 3:08-3:17, and 3:28-3:56. *Vaina Loca* copies the fundamental drum and bass patterns in *Fish Market* and is looped throughout most of the work. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Vaina Loca*. Additionally, the drum tracks in *Vaina Loca* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Vaina Loca* is the same snare drum in *Fish Market.* The timbale in *Vaina Loca* copies elements of the

timbale pattern in *Fish Market* and *Pounder*. The synth tom in *Vaina Loca* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Vaina Loca* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Vaina Loca* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

575. Specifically, *Ya No Estoy Pa Ti* incorporates a truncated sample taken directly from *Pounder* and *Fish Market*, and is looped at various intervals throughout *Ya No Estoy Pa Ti*. *Ya No Estoy Pa Ti* also features elements of the drum pattern taken from the Steely and Clevie Dancehall titled *Punanny* starting at 0:13-0:25. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Ya No Estoy Pa Ti*. Additionally, the drum tracks in *Ya No Estoy Pa Ti* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Ya No Estoy Pa Ti* is the same snare drum in *Fish Market.* The timbale in *Ya No Estoy Pa Ti* copies elements of the timbale pattern in *Fish Market* and *Pounder*. The synth tom in *Ya No Estoy Pa Ti* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Ya No Estoy Pa Ti* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Ya No Estoy Pa Ti* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

576. Each of the Ozuna Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

577. A comparison of *Fish Market* and each of the Ozuna Works establishes that each of the Ozuna Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various

defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Paulo Londra Allegations

578. As shown in the accompanying Exhibit A, Paulo Londra and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Adan y Eva, BZRP Music Sessions #23, Por Eso Vine, Tal Vez,* and *Y Yo No Se.*

579. Each of *Adan y Eva, BZRP Music Sessions #23, Por Eso Vine, Tal Vez,* and *Y Yo No Se* (collectively, the "Paulo Londra Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

580. Each of the Paulo Londra Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

581. A comparison of *Fish Market* and each of the Paulo Londra Works establishes that each of the Paulo Londra Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Pitbull Allegations

582. As shown in the accompanying Exhibit A, Pitbull and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *3 to Tango, Bon, Bon, Borracha (Pero Buena Muchacha), Chi Chi Bon Bon, Como Yo Le Doy, El Party, Happy Mama Day, Hey Ma, Mala, Mami Mami, Me Quedaré Contigo, Mil Amores (Remix), Mueve La Cintura, Muévelo Loca Boom Boom, No Lo Trates, Piensas (Dile La Verdad), Por Favor, Se La Vi, Tell Me Again, Ten Cuidado,* and *We Are One (Ole Ola).*

583. Each of *3 to Tango, Bon, Bon, Borracha (Pero Buena Muchacha), Chi Chi Bon Bon, Como Yo Le Doy, El Party, Happy Mama Day, Hey Ma, Mala, Mami Mami, Me Quedaré Contigo, Mil Amores (Remix), Mueve La Cintura, Muévelo Loca Boom Boom, No Lo Trates, Piensas (Dile La Verdad), Por Favor, Se La Vi, Tell Me Again, Ten Cuidado,* and *We Are One (Ole Ola)* (collectively, the "Pitbull Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

584. Each of the Pitbull Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

585. A comparison of *Fish Market* and each of the Pitbull Works establishes that each of the Pitbull Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Rauw Alejandro Allegations

586. As shown in the accompanying Exhibit A, Rauw Alejandro and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *2/Catorce*, *Aquel Nap ZzZz*, *Cúrame*, *De Cora*, *Detective*, *Dile a Él*, *El Efecto*, *El Efecto RMX*, *ELEGÍ*, *Enchule*, *Fantasías*, *Fantasías Remix*, *La Old Skul*, *LOKERA*, *Mis Días Sin Ti*, *Mood*, *NO DRAMA*, *No Te Creo*, *Nubes*, *Olvidemos*, *Pensándote*, *Perreo Pesau*, *Ponte Pa' Mí*, *Que Le De Remix*, *Que Le Dé*, *Química*, *Reloj*, *Sexo Virtual*, *Soy Una Gárgola*, *Strawberry Kiwi*, *Superalo*, *Tattoo*, *Un Sueño*, *Una Noche*, *¿Y Eso?*, and *Yo Sabía*.

587. Each of *2/Catorce*, *Aquel Nap ZzZz*, *Cúrame*, *De Cora*, *Detective*, *Dile a Él*, *El Efecto*, *El Efecto RMX*, *ELEGÍ*, *Enchule*, *Fantasías*, *Fantasías Remix*, *La Old Skul*, *LOKERA*, *Mis Días Sin Ti*, *Mood*, *NO DRAMA*, *No Te Creo*, *Nubes*, *Olvidemos*,

Pensándote, *Perreo Pesau*, *Ponte Pa' Mí*, *Que Le De Remix*, *Que Le Dé*, *Química*, *Reloj*, *Sexo Virtual*, *Soy Una Gárgola*, *Strawberry Kiwi*, *Superalo*, *Tattoo*, *Un Sueño*, *Una Noche*, *¿Y Eso?*, and *Yo Sabía* (collectively, the "Rauw Alejandro Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

588. Each of the Rauw Alejandro Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

589. A comparison of *Fish Market* and each of the Rauw Alejandro Works establishes that each of the Rauw Alejandro Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Reik Allegations

590. As shown in the accompanying Exhibit A, Reik and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Aleluya*, *Amigos Con Derechos*, *Duele*, *Indeciso*, *Loquita*, *Los Tragos*, *Me Niego*, *Perfecta*, *Qué Gano Olvidándote (Versión Urbana)*, *Ráptame*, *Si Me Dices Que Sí*, and *Ya Veremos*.

591. Each of *Aleluya*, *Amigos Con Derechos*, *Duele*, *Indeciso*, *Loquita*, *Los Tragos*, *Me Niego*, *Perfecta*, *Qué Gano Olvidándote (Versión Urbana)*, *Ráptame*, *Si Me Dices Que Sí*, and *Ya Veremos* (collectively, the "Reik Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

592. Each of the Reik Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

593. A comparison of *Fish Market* and each of the Reik Works establishes that each of the Reik Works incorporates both qualitatively and quantitatively

significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Ricky Martin Allegations

594. As shown in the accompanying Exhibit A, Ricky Martin and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Adiós*, *Drop It On Me*, *Fiebre*, *Perdóname*, *Tiburones [Remix]*, and *Vente Pa' Ca*.

595. Each of *Adiós*, *Drop It On Me*, *Fiebre*, *Perdóname*, *Tiburones [Remix]*, and *Vente Pa' Ca* (collectively, the "Ricky Martin Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

596. Each of the Ricky Martin Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

597. A comparison of *Fish Market* and each of the Ricky Martin Works establishes that each of the Ricky Martin Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Rosalia Allegations

598. As shown in the accompanying Exhibit A, Rosalia and a plurality of the defendants have released the songs entitled *BIZCOCHITO*, *CHICKEN TERIYAKI*, *Con Altura*, *DIABLO*, *LA COMBI VERSACE*, *SAOKO*, *TKN*, and *Yo x Ti*, *Tu x Mi*.

599. Each of *BIZCOCHITO*, *CHICKEN TERIYAKI*, *Con Altura*, *DIABLO*, *LA COMBI VERSACE*, *SAOKO*, *TKN*, and *Yo x Ti*, *Tu x Mi* (collectively, the "Rosalia Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

600. Each of the Rosalia Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

601. A comparison of *Fish Market* and each of the Rosalia Works establishes that each of the Rosalia Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Sech Allegations

602. As shown in the accompanying Exhibit A, Sech and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *911*, *Admítelo*, *Batta*, *Bentley*, *Boomerang*, *Borracho*, *Brindo*, *Casino*, *Con Bochinche*, *Confía*, *Cositas Malas*, *Cumpleaños*, *Dale*, *Dios Te Guarde ft. BCA*, *Duvibes*, *El Error*, *En Lo Oscuro*, *Fabuloso*, *Falsas Promesas*, *Feliz de Mentira*, *Goteras*, *La Discusión*, *La Luz*, *La Niña*, *La Otra*, *Lo Malo*, *Mas Pegao*, *Me Olvidé*, *Mi Ex*, *Mintiendo y Enamorando*, *Miss Lonely*, *Noche De Teteo*, *Oficial*, *Ojalá*, *Otro Trago*, *Otro Trago (Remix)*, *Pa' Que Sude*, *Panama City*, *Pata' Abajo*, *Playa*, *Portarse Mal*, *PSL*, *¡Que Más Pues!*, *Que Mas Pues Remix*, *¿Qué Somos?*, *Relación*, *Sal y Perrea*, *Sal y Perrea Remix*, *Se Va Viral*, *Si Te Vas*, *Sin Querer*, *Solita*, *Te Acuerdas*, *Tiene Novio*, *Toco Mentir*, *Tu y Yo*, *Wao*, *X Ti*, and *Yo Sin Ti*.

603. Each of *911*, *Admítelo*, *Batta*, *Bentley*, *Boomerang*, *Borracho*, *Brindo*, *Casino*, *Con Bochinche*, *Confía*, *Cositas Malas*, *Cumpleaños*, *Dale*, *Dios Te Guarde ft. BCA*, *Duvibes*, *El Error*, *En Lo Oscuro*, *Fabuloso*, *Falsas Promesas*, *Feliz de Mentira*, *Goteras*, *La Discusión*, *La Luz*, *La Niña*, *La Otra*, *Lo Malo*, *Mas Pegao*, *Me Olvidé*, *Mi Ex*, *Mintiendo y Enamorando*, *Miss Lonely*, *Noche De Teteo*, *Oficial*, *Ojalá*, *Otro Trago*, *Otro Trago (Remix)*, *Pa' Que Sude*, *Panama City*, *Pata' Abajo*, *Playa*, *Portarse Mal*, *PSL*, *¡Que Más Pues!*, *Que Mas Pues Remix*, *¿Qué Somos?*,

Relación, Sal y Perrea, Sal y Perrea Remix, Se Va Viral, Si Te Vas, Sin Querer, Solita, Te Acuerdas, Tiene Novio, Toco Mentir, Tu y Yo, Wao, X Ti, and *Yo Sin Ti* (collectively, the "Sech Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

604. Each of the Sech Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

605. A comparison of *Fish Market* and each of the Sech Works establishes that each of the Sech Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Silvestre Dangond Allegations

606. As shown in the accompanying Exhibit A, Silvestre Dangond and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Casate Conmigo, Justicia, Vallenato, Apretao, Vivir Bailando,* and *Ya No Me Duele Mas.*

607. Each of *Casate Conmigo, Justicia, Vallenato, Apretao, Vivir Bailando,* and *Ya No Me Duele Mas.* (collectively, the "Silvestre Dangond Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

608. Each of the Silvestre Dangond Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

609. A comparison of *Fish Market* and each of the Silvestre Dangond Works establishes that each of the Silvestre Dangond Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition.

The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Sky Allegations

610. As shown in the accompanying Exhibit A, Sky and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *A Vapor*, *Aqui Estare*, *Juraste*, and *Le Creo*.

611. Each of *A Vapor*, *Aqui Estare*, *Juraste*, and *Le Creo*. (collectively, the "Sky Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

612. Each of the Sky Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

613. A comparison of *Fish Market* and each of the Sky Works establishes that each of the Sky Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Wisin Allegations

614. As shown in the accompanying Exhibit A, Wisin and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *3G*, *Adicta*, *Adicto*, *Adictos a tus besos*, *Adrenalina*, *Ahí es que es*, *Amenázame*, *Amor*, *amor*, *Amor de locos*, *Andan Por Ahi*, *Buenos Días*, *Callaíto*, *Candente*, *Caramelo*, *Cerramos los Ojos*, *Claro*, *Como Tú Lo Haces*, *Contra la pared*, *Corazón Acelerao*, *Dale Mas*, *Dime qué sucedió*, *El Jinete*, *Emojis de Corazones*, *En Busca de un Caldo*, *Entramos en calor*, *Escápate Conmigo*, *Esta noche lo vamos a hacer*, *Esta vez*, *Extraño*, *Faldita esa*, *Fue W*, *Hacerte el Amor*, *Heavy*, *Heavy*, *La Camella*, *La trilogía (Introducción)*, *Labios Prohibidos*, *Los*

Vaqueros, Mari Mari, Me Siento Bien, Mi Niña, Mucho Bajo, Muévelo, Mujeres Hagan Fila, No Sé, Nota de Amor, Pégate pa' que veas, Piquete, Poder, Por Ley, Por Si Vuelves, Presión, Prohibida, Quisiera Alejarme, Quisiera Alejarme (Remix), Riendo Para No Llorar, Sacuda, Saoco, Si lo hacemos Bien, Siente el Calor, Todo Comienza en la Disco, Traviesa, Tu Libertad, Tu Cuerpo Me Llama, Vacaciones, Ven báilame, Volar, Wisin Mátalos, Yo me dejo, and *Yo Quiero Contigo*.

615. Each of *3G, Adicta, Adicto, Adictos a tus besos, Adrenalina, Ahí es que es, Amenázame, Amor, amor, Amor de locos, Andan Por Ahi, Buenos Días, Callaíto, Candente, Caramelo, Cerramos los Ojos, Claro, Como Tú Lo Haces, Contra la pared, Corazón Acelerao, Dale Mas, Dime qué sucedió, El Jinete, Emojis de Corazones, En Busca de un Caldo, Entramos en calor, Escápate Conmigo, Esta noche lo vamos a hacer, Esta vez, Extraño, Faldita esa, Fue W, Hacerte el Amor, Heavy, Heavy, La Camella, La trilogía (Introducción), Labios Prohibidos, Los Vaqueros, Mari Mari, Me Siento Bien, Mi Niña, Mucho Bajo, Muévelo, Mujeres Hagan Fila, No Sé, Nota de Amor, Pégate pa' que veas, Piquete, Poder, Por Ley, Por Si Vuelves, Presión, Prohibida, Quisiera Alejarme, Quisiera Alejarme (Remix), Riendo Para No Llorar, Sacuda, Saoco, Si lo hacemos Bien, Siente el Calor, Todo Comienza en la Disco, Traviesa, Tu Libertad, Tu Cuerpo Me Llama, Vacaciones, Ven báilame, Volar, Wisin Mátalos, Yo me dejo*, and *Yo Quiero Contigo* (collectively, the "Wisin Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

616. Each of the Wisin Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

617. A comparison of *Fish Market* and each of the Wisin Works establishes that each of the Wisin Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various

defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Wisin & Yandel Allegations

618. As shown in the accompanying Exhibit A, Wisin & Yandel and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Ahora Es, Algo Pasó, Aullando, Besos Mojados, Boricua NY1, Burn It Up, Callao, Cállate, Calle Callejero, Chica Bombastic, Como Tú No Hay Nadie, Con Mi Reggae Muero, Dame Algo, De Otra Manera, Delirando, Dembow, Desaparecio, Descará, Deseo, Dime Quienes Son, El Gitro Amarillo, Electrica, En Busca de Ti, En La Disco Bailoteo, ENCENDIO, Espejos Negros, Esta Noche Hay Pelea, Estoy Enamorado, Fuera de Base, Ganas de Ti, Gerla, Girla, Guaya, Guáyale El Mahón, Hipnotizame Remix, Hola, La Calle Caliente, La Fanática, La Gitana, La Luz, La Misión, La Misión 2, La Quebranta Hueso" (featuring El Tío), La Reunión De Los Vaqueros, La Revolución, La Rockera, La Sata, La Trova, La Vaquera, Las Cosas Cambiaron, Lento, Llamé Pa' Verte (Bailando Sexy), Llora Mi Corazón, Llueve, Manigueta, Mayor Que Yo part 2, Mayor Que Yo, Me Dañas la Mente, Me Quieren Detener, Mirala Bien, Mueve tu cuerpo lento, Muévete, Mujeron, Musica Buena, Nadie Como Tu, No Fear 3, No Sé, NO SE OLVIDA, Noche De Sexo, Ojalá, Ola, Paleta, Pam Pam, Pasan Los Dias, Pegate, Pegao, Peligro, Perfecto, Perréame, Piden Perreo, Pidiendo Calor, Por Qué Me Peleas, Prende, Presión, Quiero Hacerte el Amor, Quiero Verte Bailar, Rakata, Recuerdo, Reggae Rockeao, Reggaetón en lo Oscuro, Salgo Filoteao, Sandungueo, Se Acabó, Se desvelan, Se Viste, Sedúceme, Sensación, Sensual Te Ves, Sigan Bailando, Sin El, Sólo Una Noche, Soy De La Calle, Suavecito Despacio, Tabla, Tarzan, Te Dije Que Iba a Pasar, Te Hice Mujer, Te Noto Tensa, Te Puso A Bellaquiar, Te Siento, TIENE QUE PASAR, Títere, Todas Quieren Ser La Mas Bellas, Toma, Toma Perreo, Tortura, Te Dije Que Iba a Pasar, Tu Cuerpo Me*

Llama, Tú Sabes, Tú Tienes, Tumbao, Un Beso, Uy Uy Uy, Vengo Acabando, Veo Veo, Vicio de Ti, Vivir En Esta Tierra, Ya Me Voy, Ya Veo, Yo Quiero, and *Yo Te Quiero*.

619. Each of *Ahora Es, Algo Pasó, Aullando, Besos Mojados, Boricua NY1, Burn It Up, Callao, Cállate, Calle Callejero, Chica Bombastic, Como Tú No Hay Nadie, Con Mi Reggae Muero, Dame Algo, De Otra Manera, Delirando, Dembow, Desaparecio, Descará, Deseo, Dime Quienes Son, El Gitro Amarillo, Electrica, En Busca de Ti, En La Disco Bailoteo, ENCENDIO, Espejos Negros, Esta Noche Hay Pelea, Estoy Enamorado, Fuera de Base, Ganas de Ti, Gerla, Girla, Guaya, Guáyale El Mahón, Hipnotizame Remix, Hola, La Calle Caliente, La Fanática, La Gitana, La Luz, La Misión, La Misión 2, La Quebranta Hueso" (featuring El Tío), La Reunión De Los Vaqueros, La Revolución, La Rockera, La Sata, La Trova, La Vaquera, Las Cosas Cambiaron, Lento, Llamé Pa' Verte (Bailando Sexy), Llora Mi Corazón, Llueve, Manigueta, Mayor Que Yo part 2, Mayor Que Yo, Me Dañas la Mente, Me Quieren Detener, Mirala Bien, Mueve tu cuerpo lento, Muévete, Mujeron, Musica Buena, Nadie Como Tu, No Fear 3, No Sé, NO SE OLVIDA, Noche De Sexo, Ojalá, Ola, Paleta, Pam Pam, Pasan Los Dias, Pegate, Pegao, Peligro, Perfecto, Perréame, Piden Perreo, Pidiendo Calor, Por Qué Me Peleas, Prende, Presión, Quiero Hacerte el Amor, Quiero Verte Bailar, Rakata, Recuerdo, Reggae Rockeao, Reggaetón en lo Oscuro, Salgo Filoteao, Sandungueo, Se Acabó, Se desvelan, Se Viste, Sedúceme, Sensación, Sensual Te Ves, Sigan Bailando, Sin El, Sólo Una Noche, Soy De La Calle, Suavecito Despacio, Tabla, Tarzan, Te Dije Que Iba a Pasar, Te Hice Mujer, Te Noto Tensa, Te Puso A Bellaquiar, Te Siento, TIENE QUE PASAR, Títere, Todas Quieren Ser La Mas Bellas, Toma, Toma Perreo, Tortura, Te Dije Que Iba a Pasar, Tu Cuerpo Me Llama, Tú Sabes, Tú Tienes, Tumbao, Un Beso, Uy Uy Uy, Vengo Acabando, Veo Veo, Vicio de Ti, Vivir En Esta Tierra, Ya Me Voy, Ya Veo, Yo*

Quiero, and *Yo Te Quiero* (collectively, the "Wisin & Yandel Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

620. Specifically, *Aullando* incorporates a truncated sample taken directly from *Pounder* and *Fish Market*, and is introduced at approximately 1:01 and is looped at various intervals throughout *Aullando*. *Aullando* copies the fundamental drum and bass patterns in *Fish Market* and is looped throughout most of the work. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Aullando*. Additionally, the drum tracks in *Aullando* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Aullando* is the same snare drum in *Fish Market.* The timbale in *Aullando* copies elements of the timbale pattern in *Fish Market* and *Pounder*. The synth tom in *Aullando* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Aullando* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Aullando* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

621. Specifically, *Callao* incorporates a truncated sample taken directly from *Pounder* and *Fish Market*, and is introduced at approximately 1:18 and is looped at various intervals throughout *Callao*. *Callao* copies the second bar of the timbale pattern from *Pounder*. *Callao* copies the fundamental drum pattern in *Fish Market* and is looped throughout most of the work. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Callao*. Additionally, the drum tracks in *Callao* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Callao* is the same snare drum in *Fish Market.* The timbale in *Callao* copies

elements of the timbale pattern in *Fish Market* and *Pounder*. The synth tom in *Callao* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Callao* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Callao* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

622. Specifically, *Chica Bombastic* incorporates a truncated sample taken directly from *Pounder* and *Fish Market*, and is introduced at approximately 0:32-0:53, 1:04-1:28, 1:39-1:49, 2:04-2:11, 2:23-2:44 and 2:57-3:16 and is looped at various intervals throughout *Chica Bombastic*. *Chica Bombastic* copies the fundamental drum pattern in *Fish Market* and is looped throughout most of the work. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Chica Bombastic*. Additionally, the drum tracks in *Chica Bombastic* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Chica Bombastic* is the same snare drum in *Fish Market.* The timbale in *Chica Bombastic* copies elements of the timbale pattern in *Fish Market* and *Pounder*. The synth tom in *Chica Bombastic* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Chica Bombastic* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Chica Bombastic* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder.*

623. Specifically, *Dame Algo* incorporates a sample taken directly from *Pounder* and *Fish Market*, and is introduced at approximately 0:58-1:07, 1:08-1:17, 1:39-1:48, 2:10-2:19, 2:41-2:50, 2:52-2:59, 3:02-3:07, 4:04-4:12, and 4:24-4:37 and is looped at various intervals throughout *Dame Algo*. *Dame Algo* copies the fundamental drum pattern in *Fish Market* and is looped throughout most of the work.

The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Dame Algo*. Additionally, the drum tracks in *Dame Algo* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Dame Algo* is the same snare drum in *Fish Market.* The timbale in *Dame Algo* copies the timbale pattern in *Pounder*. The synth tom in *Dame Algo* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Dame Algo* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Dame Algo* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder.*

624. Specifically, *Deseo* incorporates a sample taken directly from *Pounder* and *Fish Market*, and is introduced at approximately 0:32-0:42, 0:55-1:04, 1:16-1:26,1:38-1:48, 2:22-2:31, 2:43-2:53, 3:15-3:24, and 3:36-3:24, and 3:36-3:48 and is looped at various intervals throughout *Deseo*. *Deseo* copies the fundamental drum pattern in *Fish Market* and is looped throughout most of the work. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Deseo*. Additionally, the drum tracks in *Deseo* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Deseo* is the same snare drum in *Fish Market.* The timbale in *Deseo* copies elements of the timbale pattern in *Fish Market* and *Pounder*. The synth tom in *Deseo* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Deseo* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Deseo* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder.*

625. Specifically, *Guaya* incorporates a sample taken directly from *Pounder* and *Fish Market*, and is introduced at approximately 1:03-1:21 and 1:44-2:02. *Guaya* copies the fundamental drum pattern in *Fish Market* and is looped throughout most of the work. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Guaya*. Additionally, the drum tracks in *Guaya* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Guaya* is the same snare drum in *Fish Market.* The timbale in *Guaya* copies the timbale pattern in *Pounder*. The synth tom in *Guaya* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Guaya* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Guaya* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

626. Specifically, *La Luz* incorporates a sample taken directly from *Pounder* and *Fish Market*, and is introduced at approximately 1:15-1:33, 1:45-1:53, 2:04-2:12, 2:24-2:33, 2:44-2:52, 3:04-3:12, 3:16-3:23, 3:33-3:43, and 4:03-4:11 and is looped at various intervals throughout *La Luz*. *La Luz* copies the fundamental drum pattern in *Fish Market* and is looped throughout most of the work. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *La Luz*. Additionally, the drum tracks in *La Luz* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *La Luz* is the same snare drum in *Fish Market.* The timbale in *La Luz* copies elements of the timbale pattern in *Pounder*. The synth tom in *La Luz* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *La Luz* copies *Fish Market*'s bass pattern which anchors the root of the

chords on beats 1 and 3. The timbre of the bass in *La Luz* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

627. Specifically, *Reggaetón en lo Oscuro* incorporates a sample taken directly from *Pounder* and *Fish Market*, and is introduced at approximately 0:46-1:05,1:18-1:48, 2:10-2:30, 2:53-3:12, and 3:27-3:43 and is looped at various intervals throughout *Reggaetón en lo Oscuro*. *Reggaetón en lo Oscuro* copies the fundamental drum pattern in *Fish Market* and is looped throughout most of the work. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Reggaetón en lo Oscuro*. Additionally, the drum tracks in *Reggaetón en lo Oscuro* feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Reggaetón en lo Oscuro* is the same snare drum in *Fish Market.* The timbale in *Reggaetón en lo Oscuro* copies the timbale pattern in *Pounder*. The synth tom in *Reggaetón en lo Oscuro* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Reggaetón en lo Oscuro* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Reggaetón en lo Oscuro* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

628. Specifically, *Todo Comienza en la Disco* incorporates a sample taken directly from *Pounder* and *Fish Market*, and is introduced at approximately 1:14-1:34, 1:45-1:50, 2:06-2:36, 3:11-3:19, 3:32-3:52, 4:14-4:44, 4:55-5:03 and is looped at various intervals throughout *Todo Comienza en la Disco*. *Todo Comienza en la Disco* copies the fundamental drum pattern in *Fish Market* and is looped throughout most of the work. The 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and remains dominant throughout *Todo Comienza en la Disco*. Additionally, the drum tracks in *Todo Comienza en la*

Disco feature the same kick drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Todo Comienza en la Disco* is the same snare drum in *Fish Market.* The timbale in *Todo Comienza en la Disco* copies the timbale pattern in *Pounder*. The synth tom in *Todo Comienza en la Disco* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Todo Comienza en la Disco* copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Todo Comienza en la Disco* is the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

629. Each of the Wisin & Yandel Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

630. A comparison of *Fish Market* and each of the Wisin & Yandel Works establishes that each of the Wisin & Yandel Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Wolfine Allegations

631. As shown in the accompanying Exhibit A, Wolfine and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Amor De Mentiras*, *Bella*, *Cerquita*, *El flete*, *El plan*, *Julieta*, *Julieta Remix*, and *Te Fallé*.

632. Each of *Amor De Mentiras*, *Bella*, *Cerquita*, *El flete*, *El plan*, *Julieta*, *Julieta Remix*, and *Te Fallé* (collectively, the "Wolfine Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

633. Each of the Wolfine Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

634. A comparison of *Fish Market* and each of the Wolfine Works establishes that each of the Wolfine Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Yandel Allegations

635. As shown in the accompanying Exhibit A, Yandel and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Actua, Bella, Bella, Buscame, Calculadora, Calentón, Celda, Chu Chin, Como Antes, Concierto Privado, Coraje, Cuando Se Da, Déjate Amar, Déjate amar [Remix], Déjame Explorar, Dembow (Remix), Dembow 2020, Despacio, Diablo En Mujer, Dime, Dónde Está Mi Gata, Duro Hasta Abajo, El Gusto, Ella Entendió, En Cero (Remix), En Cero, En La Disco Me Conoció, En La Oscuridad, Enamorado De Ti, Encantadora, Encantadora (Remix), Espionaje, Eva, Fallaron, Fantasía (Kiss Kiss), Hasta Abajo Le Doy, Ilegal, Imaginar, La Calle Me Llama, La Calle Me Lo Pidió, Listo Para El Cantazo, Llégale, Loba, Mami Yo Quisiera Quedarme, Mano al Aire, Me Enamoré, Mi Combo, Mi Religión, Mia Mia, Muy Personal, No Pare, No Perdamos Tiempo, No Quiero Amores, No Sales De Mi Mente, No Te Soltaré, No Te Vayas, Nunca Me Olvides (Remix), Nunca Me Olvides, Nunca Y Pico, Para Irnos (A Fuego), Perreito Lite, Perreo, Persígueme, Plakito, Plakito (Remix), Ponme al Dia, Por Mi Reggae Muero 2020, Que No Acabe, Que Vas Hacer, Riversa, Say Ho, Se Me Olvidó, Se Viste y Se Maquilla, Si Se Da, Sola Solita, Sólo Mía, Subconsciente, Sumba Yandel, Te Amaré, Te Suelto el Pelo, Tequila, Todo*

Lo Que Quiero, Trepando Paredes, Tu Cura, Un Viaje, Una Señal, and *Ya Yo Me Cansé*.

636. Each of *Actua, Bella, Bella, Buscame, Calculadora, Calentón, Celda, Chu Chin, Como Antes, Concierto Privado, Coraje, Cuando Se Da, Déjate Amar, Déjate amar [Remix], Déjame Explorar, Dembow (Remix), Dembow 2020, Despacio, Diablo En Mujer, Dime, Dónde Está Mi Gata, Duro Hasta Abajo, El Gusto, Ella Entendió, En Cero (Remix), En Cero, En La Disco Me Conoció, En La Oscuridad, Enamorado De Ti, Encantadora, Encantadora (Remix), Espionaje, Eva, Fallaron, Fantasía (Kiss Kiss), Hasta Abajo Le Doy, Ilegal, Imaginar, La Calle Me Llama, La Calle Me Lo Pidió, Listo Para El Cantazo, Llégale, Loba, Mami Yo Quisiera Quedarme, Mano al Aire, Me Enamoré, Mi Combo, Mi Religión, Mia Mia, Muy Personal, No Pare, No Perdamos Tiempo, No Quiero Amores, No Sales De Mi Mente, No Te Soltaré, No Te Vayas, Nunca Me Olvides (Remix), Nunca Me Olvides, Nunca Y Pico, Para Irnos (A Fuego), Perreito Lite, Perreo, Persígueme, Plakito, Plakito (Remix), Ponme al Dia, Por Mi Reggae Muero 2020, Que No Acabe, Que Vas Hacer, Riversa, Say Ho, Se Me Olvidó, Se Viste y Se Maquilla, Si Se Da, Sola Solita, Sólo Mía, Subconsciente, Sumba Yandel, Te Amaré, Te Suelto el Pelo, Tequila, Todo Lo Que Quiero, Trepando Paredes, Tu Cura, Un Viaje, Una Señal*, and *Ya Yo Me Cansé* (collectively, the "Yandel Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

637. Each of the Yandel Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

638. A comparison of *Fish Market* and each of the Yandel Works establishes that each of the Yandel Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various

defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Zion Allegations

639. As shown in the accompanying Exhibit A, Zion and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *Aguanta Mas, Alocate, Amor, Amor de Pobre, Cazando, Easy, Ella Me Dice, Fantasma, Hagamos El Amor (The Perfect Melody), La Formula Sigue (La Formula), Me Voy, Mirándonos, More, More (Remix), Sigue Ahí, Te Vas, The Way She Moves, Veo, Yo Voy A Llegar*, and *Zun Da Da*.

640. Each of *Aguanta Mas, Alocate, Amor, Amor de Pobre, Cazando, Easy, Ella Me Dice, Fantasma, Hagamos El Amor (The Perfect Melody), La Formula Sigue (La Formula), Me Voy, Mirándonos, More, More (Remix), Sigue Ahí, Te Vas, The Way She Moves, Veo, Yo Voy A Llegar*, and *Zun Da Da* (collectively, the "Zion Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

641. Each of the Zion Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

642. A comparison of *Fish Market* and each of the Zion Works establishes that each of the Zion Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

Zion & Lennox Allegations

643. As shown in the accompanying Exhibit A, Zion & Lennox and a plurality of the defendants, the corresponding defendants for each song named therein, have released the songs entitled *A Forgotten Spot (Olvidado), Aguántate,*

Ahora Es Que Es, Ahora te sueltas, Amor Genuino, Aquí Estoy Yo, Bachatealo, Baila Conmigo, Baila Para Mí, Bailando Tu Y Yo, Bandida, Boom Boom, Chupop (Remix), Chupop "Se Va", Cierra Los Ojos, Cinturita, Colora, Como Curar, Con Una Sonrisa, Dame Todo, Dame Tu Amor, Daña Party, De Inmediato, Demuéstrale a tu Hombre, Descontrólate, Destino, Dime Baby, dime cuanto tengo que esperar, Diosa, Doncella, Don't Stop, El Cantante, El Tiempo, Ella Me Mintió, Embriágame, Embriágame Remix, Enamórate, Enchuletiao, Entendemos, Eres Bonita, es mejor olvidarlo, Esa Nena, Estas tentandome, Estoy Esperando, Estrella, Fantasma Remix Fuiste Tu, Ganas de Ti, Guaya, Guaya Rompe Cintura, Guayo, Hace Tiempo, Hasta Abajo, Hay Algo En Ti, Hipnosis, Hola, Hoy lo Siento, Intro | El Sistema, La Botella, La Cita, La Española, La Niña, La Noche Es Larga, La Player (Bandolera), Loco, Más o Menos, Me Arrepiento, Me Dirijo A Ella, Me Pones en Tension, Mi Tesoro, Mírame, Momentos, Motivando la Yal (Intro), Mujer Satisfecha, Mujeriego, No Amarres Fuego, No Dejes Que Se Muera, No Mas, No Me Compares, No Me Llama, No Pares, No Pierdas Tiempo, No Sé Cómo Empezar, Nuestro Amor, Otra Vez, Pégate, Perdóname, Perla, Pierdo La Cabeza Remix, Pierdo La Cabeza, Prende en Fuego, Prepárte, Que Bien Se Siente, Qué Vas A Hacer?, Quieren Acción, Quiero Tenerte, Quiero Tocarte, Reggae Reggae, Se Puso Feo, Sentir, Sere Yo, Sistema, Solo Tú, Soltera, Te Hago el amor, Te Mueves, Tengo Que Decir, Tienes Que Hacerlo, Trayectoria, Tu Cuerpo Quiero, Tu Movimiento Me Excita, Tuyo y Mio, Una Cita, Una Nota, Vamos En Serio, Vivimos Facturando, Y Vas Caminando, Yo Soy Tu Hombre, Yo Tengo Una Gata, Yo Voy, and *Zion y Lennox*.

644. Each of *A Forgotten Spot (Olvidado), Aguántate, Ahora Es Que Es, Ahora te sueltas, Amor Genuino, Aquí Estoy Yo, Bachatealo, Baila Conmigo, Baila Para Mí, Bailando Tu Y Yo, Bandida, Boom Boom, Chupop (Remix), Chupop "Se Va", Cierra Los Ojos, Cinturita, Colora, Como Curar, Con Una Sonrisa, Dame Todo, Dame Tu Amor, Daña Party, De Inmediato, Demuéstrale a tu Hombre,*

Descontrólate, Destino, Dime Baby, dime cuanto tengo que esperar, Diosa, Doncella, Don't Stop, El Cantante, El Tiempo, Ella Me Mintió, Embriágame, Embriágame Remix, Enamórate, Enchuletiao, Entendemos, Eres Bonita, es mejor olvidarlo, Esa Nena, Estas tentandome, Estoy Esperando, Estrella, Fantasma Remix Fuiste Tu, Ganas de Ti, Guaya, Guaya Rompe Cintura, Guayo, Hace Tiempo, Hasta Abajo, Hay Algo En Ti, Hipnosis, Hola, Hoy lo Siento, Intro | El Sistema, La Botella, La Cita, La Española, La Niña, La Noche Es Larga, La Player (Bandolera), Loco, Más o Menos, Me Arrepiento, Me Dirijo A Ella, Me Pones en Tension, Mi Tesoro, Mírame, Momentos, Motivando la Yal (Intro), Mujer Satisfecha, Mujeriego, No Amarres Fuego, No Dejes Que Se Muera, No Mas, No Me Compares, No Me Llama, No Pares, No Pierdas Tiempo, No Sé Cómo Empezar, Nuestro Amor, Otra Vez, Pégate, Perdóname, Perla, Pierdo La Cabeza Remix, Pierdo La Cabeza, Prende en Fuego, Prepárte, Que Bien Se Siente, Qué Vas A Hacer?, Quieren Acción, Quiero Tenerte, Quiero Tocarte, Reggae Reggae, Se Puso Feo, Sentir, Sere Yo, Sistema, Solo Tú, Soltera, Te Hago el amor, Te Mueves, Tengo Que Decir, Tienes Que Hacerlo, Trayectoria, Tu Cuerpo Quiero, Tu Movimiento Me Excita, Tuyo y Mio, Una Cita, Una Nota, Vamos En Serio, Vivimos Facturando, Y Vas Caminando, Yo Soy Tu Hombre, Yo Tengo Una Gata, Yo Voy, and *Zion y Lennox* (collectively, the "Zion & Lennox Works") were separately released at different times subsequent to the 1989 release of *Fish Market*.

645. Each of the Zion & Lennox Works incorporates an unauthorized sample of the *Fish Market* recording and a verbatim copy of the *Fish Market* composition as the primary rhythm / drum section of each work.

646. A comparison of *Fish Market* and each of the Zion & Lennox Works establishes that each of the Zion & Lennox Works incorporates both qualitatively and quantitatively significant sections of the *Fish Market* recording and composition. The

various defendants responsible for each of the identified works and the manner of copying are described in the accompanying Exhibit A.

647. Each of the comparisons and musical analyses set forth above are provided for notice and illustrative purposes and are not meant to be inclusive of all similarities and acts and instances of copying at issue.

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648. *Fish Market* is an instrumental and composition that has a distinctive drum pattern that involves the hi-hat and kick drum playing together on beats one to four, while the snare drum has ghost notes on the third and eleventh sixteenth notes of each bar, complementing the snare on the fourth, seventh, twelfth and fifteenth sixteenth beats of each bar. The timbale also has a pattern that includes a unique combination of 16th beat notes. The bass plays on beats one and three, along with an electronic tom or a similar sound. The tambourine has a pattern that includes a unique combination of 16th and 8th beat notes. This pattern, included in the Infringing Works, is sometimes played with a substitute high-frequency percussion instrument. All of the patterns of the hi hat, tambourines, timbales, tom, snare and kick, in the same configuration with respect to each other are copied in the Infringing Works. The bass of the *Fish Market* work, which anchors on one and three, is also copied in the Infringing Works. The combined copied portions of the *Fish Market* work found in the Infringing Works form a combination of many rhythms on different instruments acting all in concert to form an entire protectable section of music that are not found in the manner copied from *Fish Market*, in any work that predates *Fish Market*.

649. Plaintiffs did not consent to the use of their copyrighted compositions and sound recordings as alleged herein.

650. On information and belief, Plaintiffs allege that Defendants, and each of them, have performed, distributed, streamed, sold, and/or otherwise exploited each of

the Infringing Works, and/or authorized third parties to do so, within the three years preceding the filing of this action.

651. On information and belief, Plaintiffs allege that Defendants, and each of them, continue to exploit and receive monies from the exploitation of Plaintiff's copyrighted works, as alleged herein. Defendants' wrongful copying and/or exploitation of Plaintiffs' copyrighted material in the United States and/or its territories has also allowed for further infringement abroad. Defendants, and each of their, exploitation of Plaintiffs' work, as detailed herein, constitutes infringement.

652. On information and belief, Plaintiffs allege that Defendants, and each of them, have distributed, streamed, performed, uploaded, downloaded, and reproduced the Infringing Works on and through servers and streaming services in the United States and have maintained copies of the Infringing Works on servers in the United States, and have distributed, streamed, and performed the Infringign Works to United States residents and consumers.

653. Upon information and belief, Plaintiffs allege that UMG, Sony, and/or Sony Latin, from its offices in New York city and/or Santa Monica, California released, distributed, promoted, broadcast, licensed, and/or exploited for profit the songs and music at issue in this case.

654. Upon information and belief, Plaintiffs allege that one of more of the Defendants and their publishing companies received monies in connection with the songs and music at issue in this case from ASCAP and other companies based in California.

First Claim for Relief

(For Copyright Infringement - Against all Defendants)

655. Plaintiffs repeat, re-allege, and incorporate by reference all preceding paragraphs of this Complaint.

656. Plaintiffs own registered copyrights in and for the compositions and sound recordings for *Fish Market* and *Pounder* and the composition for *Dem Bow*.

657. *Fish Market* is an original composition and sound recording.

658. Plaintiffs own copyrights in the composition of *Dem Bow* along with Rexton Ralston Gordon.

659. *Dem Bow* is an original composition.

660. *Pounder* is an original sound recording that incorporates the *Fish Market* composition and for which Plaintiffs have ownership.

661. Defendants had access to *Fish Market* because *Fish Market* was widely distributed throughout the world since 1989 on vinyl and CD. Defendants also had access to the *Fish Market* through distribution of *Dem Bow* on vinyl and CD which was a worldwide hit within the global reggae dancehall scene and remains a reggae dancehall classic. *Fish Market* and *Dem Bow* were widely distributed on vinyl and CD, which were the dominant media formats at the time of release, and together sold tens of thousands copies on singles and albums within the global reggae dancehall scene. Both *Fish Market* and *Dem Bow* are also available on streaming platforms, including Spotify, Apple Music, Amazon, Pandora, and YouTube prior to the creation of each of the Infringing Works.

662. Defendants, and each of them, also had access via *Ellos Benia* and the *Pounder* which were widely distributed in hard copy and via the aforementioned streaming platforms prior to the creation of each of the Infringing Works.

663. Defendants, and each of them had access to *Pounder* via its release in physical format or availability online. And Defendant's, and each of their, access to the *Pounder* is further proven by use of portions of the sound recording for *Pounder* by numerous Defendants.

664. The access to *Fish Market* by the Defendants associated with the Daddy Yankee Works is demonstrated in the *Dem Bow* infringing Daddy Yankee songs

Golpe de Estado and *Calenton*, which include elements that are substantially similar if not virtually identical to significant portions of *Dem Bow*, including the lyrical portions of *Dem Bow*.

665. The access to *Fish Market* by the Defendants associated with the Daddy Yankee Works is also demonstrated in the lyrics of the Daddy Yankee song *Zum Zum*, and additional infringing Daddy Yankee songs *Camuflash*, *Desafio*, *La Rompe Carros*, *Nada Ha Cambiado*, *Po' Encima*, and *Quiero Decirte*, which are all based on the *Pounder*, and which refer to the underlying rhythmic composition as *Dembow*.

666. The access to *Fish Market* by the Defendants associated with the Daddy Yankee Works is also demonstrated in the lyrics of the Daddy Yankee songs *Desafio*, and *El Empuje*, which refer to the underlying rhythmic composition as "Dembow".

667. In addition, Defendants' "sampling" (direct extraction and reproduction) of *Fish Market* and/or *Pounder* establishes access by way of striking similarity, if not virtual identity, and establishes access.

668. Defendants, and each of them, infringed Plaintiffs' rights in *Fish Market* by sampling the recording *Fish Market* and/or *Pounder* and reproducing such sample in one or all of the Infringing Works without Plaintiffs' authorization or consent.

669. Alternatively, Defendants, and each of them, infringed Plaintiffs' rights in *Fish Market* by making a direct copy of the composition of *Fish Market* and using that copy in one or all of the Infringing Works without Plaintiffs' authorization or consent.

670. Upon information and belief, Plaintiffs allege that Defendants have infringed Plaintiffs' rights in the works identified herein by, without limitation, (a) authorizing the reproduction, distribution and sale of records and digital downloads of the Infringing Works through the execution of licenses, and/or actually reproducing, and/or selling and distributing physical or digital or electronic copies of the Infringing Works through various physical and online sources and applications,

including without limitation, through Amazon.com, Walmart, Target and iTunes; (b) streaming and/or publicly performing or authorizing the streaming and/or public performance of the Infringing Works through, without limitation, Spotify, YouTube, and Apple Music; and (c) participating in and furthering the aforementioned infringing acts, and/or sharing in the proceeds therefrom, all through substantial use of *Fish Market* in and as part of the Infringing Songs, packaged in a variety of configurations and digital downloads, mixes and versions, and performed in a variety of ways including, but not limited to, audio and video.

671. Plaintiffs are informed and believes and thereon alleges that Sony, Ultra, Energy Music Corp, UMP, BMG, Warner, Peermusic III, Ltd, Pulse Records, Sony Music Publishing, LLC, Maybach Music Group, LLC, Cinq Music Group, LLC Cinq Music Publishing, LLC, Real Hasta la Muerte, LLC, Aura Music, LLC, Hipgnosis Songs Group, LLC, Kemosabe Records, LLC, Concord Music Group, LLC, Vydia, Inc., Solar Music Rights Management Limited, Glad Empire Live, LLC, Hear This Music, LLC, Mad Decent Publishing, LLC, Mad Decent Protocol, LLC, Rich Music Inc., Dimelo Vi LLC, VP Records Corporation, Mr. 305, Inc., Duars Entertainment, Corp., Ingrooves Music Group, Empire Distribution, Inc., OVO Sound, LLC, Flow La Movie, Inc., The Royalty Network, Inc., WK Records, LLC, La Base Music Group, LLC and Kobalt have infringed Plaintiffs' rights in *Fish Market*, *Pounder*, and *Dem Bow* by, without limitation, exploiting it for profit by licensing, or otherwise authorizing third parties to use, reproduce and/or perform the Infringing Works for profit.

672. Upon information and belief, Plaintiffs allege that Defendants have infringed Plaintiffs' rights in *Fish Market*, *Pounder*, and *Dem Bow* by copying the compositionsand/or sampling the recording thereof in the production of the Infringing Works without Plaintiffs' authorization.

673. Upon information and belief, Plaintiffs allege that Defendants have infringed Plaintiffs' rights in *Fish Market*, *Pounder*, and *Dem Bow* by, without limitation, (a) authorizing the reproduction, distribution and sale of records and digital downloads of the Infringing Works, through the execution of licenses, and/or actually reproducing, and/or selling and distributing physical or digital or electronic copies of the Infringing Works through various physical and online sources and applications, including without limitation, through Amazon.com, Walmart, Target and iTunes; (b) streaming and/or publicly performing or authorizing the streaming and/or public performance of the Infringing Works through, without limitation, Spotify, YouTube, and Apple Music; and (c) participating in and furthering the aforementioned infringing acts, and/or sharing in the proceeds therefrom, all through substantial use of *Fish Market*, *Pounder*, and *Dem Bow* in and as part of the Infringing Works, packaged in a variety of configurations and digital downloads, mixes and versions, and performed in a variety of ways including, but not limited to, audio and video.

674. Defendants, and each of them, have engaged and continue to engage in the unauthorized reproduction, distribution, public performance, licensing, display, and creation of the Infringing Works. The foregoing acts infringe Plaintiffs' rights under the Copyright Act. Such exploitation includes, without limitation, Defendants', and each of them, distributing and broadcasting the Infringing Works on streaming platforms, including Spotify, Apple Music, Amazon, Pandora, and YouTube.

675. Due to Defendants', and each of their, acts of infringement, Plaintiffs' have suffered actual, general, and special damages in an amount to be established at trial, including but not limited to lost license fees and other economic opportunities related to *Fish Market*, *Dem Bow* and/or *Pounder*.

676. Due to Defendants' acts of copyright infringement as alleged herein, Defendants, and each of them, have obtained direct and indirect profits they would

not otherwise have realized but for their infringement of Plaintiffs' rights in Plaintiffs' copyrighted compositions and sound recordings. As such, Plaintiffs are entitled to disgorgement of Defendants' profits directly and indirectly attributable to Defendants' infringements of their rights in the compositions and sound recordings in an amount to be established at trial.

677. Plaintiffs are informed and believe and now allege that Defendants, and each of their, conduct as alleged herein was willful, reckless, and/or with knowledge, subjecting Defendants, and each of them, to enhanced statutory damages, claims for costs and attorneys' fees, and/or a preclusion from deducting certain costs when calculating disgorgeable profits.

Second Claim for Relief

(For Vicarious and/or Contributory Copyright Infringement - Against all Defendants)

678. Plaintiffs repeat, re-allege, and incorporate by reference all preceding paragraphs of this Complaint.

679. Plaintiffs are informed and believe and now allege that Defendants knowingly induced, participated in, aided and abetted in and profited from the illegal reproduction, distribution, and publication of the Infringing Works as alleged above. Specifically, the producers (including, but not limited to, Sony, Ultra, UMG,) underwrote, facilitated, and participated in the illegal copying and infringing of the individual musician Defendants during the creation of the Infringing Works and realized profits through their respective distribution, and publication of the respective Infringing Works. And Defendants, and each of them, collaborated with other artists to create the Infringing Works, and, in doing so, knowingly incorporated maerial elements from the compositions and sound recordings of *Fish Market* and *Pounder* and the composition of *Dem Bow*, with knowledge that they did not have the requisite consent.

680. Plaintiffs are informed and believe and now allege that Defendants, and each of them, are vicariously liable for the infringement alleged herein because they had the right and ability to supervise the infringing conduct and because they had a direct financial interest in the infringing conduct. Specifically, each Defendant involved in the infringement had the ability to oversee the publication and distribution of the Infringing Works. And, Defendants, and each of them, realized profits through their respective obtainment, distribution, and publication of the Infringing Works. On information and belief it is alleged that to the extent that any Defendant collaborated with another artist to create one or more of the Infringing Works, that Defendant is vicariously liable for that other artist's infringement because Defendants were able to supervise and or control the infringing conduct and profited from the infringement.

681. By reason of Defendants', and each of their, acts of contributory and vicarious infringement as alleged above, Plaintiffs have suffered and will continue to suffer substantial damages in an amount to be established at trial, as well as additional actual, general, and special damages in an amount to be established at trial.

682. Due to Defendants' acts of copyright infringement as alleged herein, Defendants, and each of them, have obtained direct and indirect profits they would not otherwise have realized but for their infringement of Plaintiffs' rights. As such, Plaintiffs are entitled to disgorgement of Defendants' profits directly and indirectly attributable to Defendants' infringement of Plaintiffs' rights in their copyrighted compositions and sound recordings in an amount to be established at trial.

683. Plaintiffs are informed and believe and now allege that Defendants, and each of their, conduct as alleged herein was willful, reckless, and/or with knowledge, subjecting Defendants, and each of them, to enhanced statutory damages, claims for costs and attorneys' fees, and/or a preclusion from deducting certain costs when calculating disgorgeable profits.

Prayer for Relief

(Against All Defendants)

WHEREFORE, Plaintiffs pray for relief as follows:

a. That Defendants, and each of them, as well as their affiliates, agents, and employees be enjoined from infringing Plaintiffs' copyrights in and to Plaintiffs' copyrighted compositions and sound recordings;

b. Granting an injunction permanently restraining and enjoining Defendants, and each of them, as well as their officers, agents, employees, and attorneys, and all those persons or entities in active concert or participation with them, or any of them, from further infringing Plaintiff's copyrights in and to Plaintiffs' copyrighted compositions and sound recordings;

c. For a constructive trust to be entered over any recordings, videos reproductions, files, online programs, and other material in connection with all recordings of the Infringing Works, and all revenues resulting from the exploitation of same, for the benefit of Plaintiffs;

d. That Plaintiffs be awarded all profits of Defendants, and each, plus all losses of Plaintiffs, plus any other monetary advantage or financial benefit gained or realized by the Defendants, or each of them, through their infringement, the exact sum to be proven at the time of trial;

e. That Defendants pay damages equal to Plaintiffs' actual damages and lost profits;

f. That Plaintiffs be awarded statutory damages and attorneys' fees as available under 17 U.S.C. § 505 or other statutory or common law;

g. That Plaintiffs be awarded pre-judgment interest as allowed by law;

h. That Plaintiffs be awarded the costs of this action; and

i. That Plaintiffs be awarded such further legal and equitable relief as the Court deems proper.

Plaintiff demands a jury trial on all issues so triable pursuant to Fed. R. Civ. P. 38 and the 7th Amendment to the United States Constitution.

Respectfully submitted,

Dated: April 22, 2023 By: *<u>/s/ Scott Alan Burroughs</u>*

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