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Attorneys for Plaintiffs

8
9 **UNITED STATES DISTRICT COURT**
CENTRAL DISTRICT OF CALIFORNIA

10
11 CLEVELAND CONSTANTINE
12 BROWNE, an individual; ANIKA
13 JOHNSON, as personal representative and
14 executor of the ESTATE OF WYCLIFFE
15 JOHNSON, deceased; STEELY &
16 CLEVIE PRODUCTIONS LTD., and
17 CARL GIBSON, as personal representative
18 and executor of THE ESTATE OF
19 EPHRAIM BARRETT,

20 Plaintiffs,

21 v.

22 RODNEY SEBASTIAN CLARK
23 DONALDS, an individual; CAROLINA
24 GIRALDO NAVARRO, an individual;
25 ARMANDO CHRISTIAN PÉREZ, an
26 individual; GIORDANO ASHRUF, an
27 individual; SHAREEF BADLOE, an
28 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

1 INC., a California corporation; BMG
2 RIGHTS MANAGEMENT, LLC, a
3 Delaware limited liability company;
4 WARNER CHAPPELL MUSIC, Inc., a
5 Delaware corporation; ULTRA
6 RECORDS, LLC, a Delaware limited
7 liability company; ENERGY MUSIC
8 CORP, a Florida corporation, LUIS
9 ALFONSO RODRÍGUEZ LÓPEZ-
10 CEPERO, an individual; MAURICIO
11 RENGIFO, an individual; ANDRÉS
12 TORRES, an individual; MICHAEL
13 ANTHONY TORRES MONGE, an
14 individual; JUAN CARLOS OZUNA
15 ROSADO, an individual; ERIKA MARÍA
16 ENDER SIMOES, an individual; RAMÓN
17 LUIS AYALA RODRÍGUEZ, an
18 individual; OLADAYO OLATUNJI, an
19 individual; STEPHANIE VICTORIA
20 ALLEN, an individual; NICK RIVERA
21 CAMINERO, an individual; SEBASTIÁN
22 OBANDO GIRALDO, an individual;
23 PABLO AREVALO LLANO, an
24 individual; CARLOS EFRÉN REYES
25 ROSADO, an individual; RAÚL
26 ALEJANDRO OCASIO RUIZ, an
27 individual; JUSTIN BIEBER, an
28 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;

1 EMMANUEL GAZMEY SANTIAGO, an
individual; LLANDEL VEGUILLA
2 MALAVÉ, an individual; JUAN CARLOS
3 SALINAS JR., an individual; OSCAR
EDWARD SALINAS, an individual;
4 FRANCISCO SALDAÑA, an individual;
5 VÍCTOR B CABRERA, an individual;
CARLOS ISAÍAS MORALES
6 WILLIAMS, an individual; URBANI
7 MOTA CEDEÑO, an individual;
8 MARCOS MASIS, an individual; JUAN
9 LUIS MORERA LUNA, an individual;
SONY/ATV MUSIC PUBLISHING (UK)
10 LIMITED, an English private limited
company; EL CARTEL RECORDS, INC.,
11 a Puerto Rican Corporation; GASOLINA
PUBLISHING CO, a Puerto Rican
12 Corporation; SONY MUSIC
13 ENTERTAINMENT US LATIN, LLC, a
Delaware Limited Liability Company;
14 ABRAHAM MATEO CHAMORRO, an
15 individual; JAVIER ALEXANDER
SALAZAR, an individual; LARISSA DE
16 MARCEDO MACHADO, an individual;
17 JUSTIN RAFAEL QUILES RIVERA, an
individual; PEERMUSIC III, LTD., A
18 Delaware Corporation; PULSE
19 RECORDS, INC., a California
Corporation; ALEXANDER DELGADO
20 HERNANDEZ, an individual; RANDY
21 MALCOM MARTINEZ, an individual;
22 AUSTIN AGUSTIN SANTOS, an
individual; RAFAEL CASTILLO
23 TORRES, an individual; JESUS MANUEL
NIEVES CORTEZ, an individual; ANDY
24 CLAY CRUZ, an individual; XAVIER
25 SEMPER, an individual; LUIAN
MALAVE, an individual; SONY MUSIC
26 PUBLISHING, LLC, a Delaware limited
27 liability company; MAURICIO

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1 ALBERTO REGLERO RODRIGUEZ, an
individual; RICARDO ANDRES
2 REGLERO RODRIGUEZ, an individual;
ANDRES TORRES, an individual; JORGE
3 VALDES, an individual; MAYBACH
4 MUSIC GROUP, LLC, a Florida Limited
Liability Company; CINQ MUSIC
5 GROUP, LLC, a California Limited
Liability Company; CINQ MUSIC
6 PUBLISHING, LLC, a California Limited
Liability Company; EGBERT ROSA
7 CINTRON, an individual; REAL HASTA
8 LA MEURTE, LLC, a Florida Limited
Liability Company; NELSON DIAZ
9 MARTINEZ, an individual; DANIEL
10 OVIEDO, an individual; CARBON FIBER
MUSIC, INC., a Florida Corporation;
11 ENRIQUE IGLESIAS, an individual;
12 RIMAS MUSIC, LLC, a Florida Limited
Liability Company; BENITO ANTONIO
13 MARTINEZ OCASIO, an individual;
14 FELIX ORTIZ TORRES, an individual;
15 GABRIEL PIZARRO, an individual;
16 AURA MUSIC, LLC, a Florida Limited
Liability Company; FREDDY
17 MONTALVO JR., an individual; MIGUEL
18 ANDRES MARTINEZ PEREA, an
individual; CHRISTIAN MENA, an
19 individual; VLADIMIR FELIX, an
20 individual; ORLANDO JAVIER VALLE
21 VEGA, an individual; EDWIN VASQUEZ
VEGA, an individual; HIPGNOSIS
22 SONGS GROUP, LLC, a Delaware
Limited Liability Company; KEMOSABE
23 RECORDS, LLC, a Delaware Limited
Liability Company; REBBECA MARIE
24 GOMEZ, an individual; JUAN LUIS
LONDONO ARIAS, an individual;
25 NATALIA AMAPOLA ALEXANDRA
26 GUTIERREZ BATISTA, an individual;
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1 CAMILO ECHEVERRIA, an individual;
2 CONCORD MUSIC GROUP, LLC, a
3 Delaware Limited Liability Company;
4 PEDRO DAVID DALECCIO TORRES,
5 an individual; MANUEL TURIZO
6 ZAPATA, an individual; ANTON
7 ALVAREZ, an individual; ALEJANDRO
8 RENGIFO, an individual; MAURICIO
9 RENGIFO, an individual; JESUS
10 ALBERTO NAVARRO, an individual;
11 JULIO RAMIREZ EGUIA, an individual;
12 GILBERTO MARIN ESPINOZA, an
13 individual; DANNA PAOLA RIVERA
14 MUNGUIA, an individual; MICHAEL
15 EGRED MEJIA, an individual; CARLOS
16 ALBERTO VIVES RESTREPO, an
17 individual; ENRIQUE MARTIN
18 MORALES, an individual; MARCOS
19 RAMIREZ, an individual; VICTOR R.
20 TORRES, an individual; JULIO
21 ALBERTO CRUZ GARCIA, an
22 individual; VYDIA, INC., a Delaware
23 Corporation; RICHARD CAMACHO, an
24 individual; ERICK BRIAN COLON, an
25 individual; CHRISTOPHER VELEZ, an
26 individual; ZABDIEL DE JESUS, an
27 individual; SALOMON VILLADA
28 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;

1 MARCOS D. PEREZ, an individual;
2 MARTHA IVELISSE PESANTE
3 RODRIGUEZ, an individual; JOSE
4 ALVARO OSORIO BALVIN, an
5 individual; THOMAS WESLEY PENTZ,
6 an individual; ERIC ALBERTO-LOPEZ,
7 an individual; MAD DECENT
8 PUBLISHING, LLC, a Delaware Limited
9 Liability Company; MAD DECENT
10 PROTOCOL, LLC, a Pennsylvania
11 Limited Liability Company; JASON JOEL
12 DESROULEAUX, an individual; JOSHUA
13 CHRISTIAN NANAI, an individual;
14 JULIO MANUEL GONZALEZ
15 TAVAREZ, an individual; RICH MUSIC
16 INC., a Delaware Corporation;
17 GIENCARLOS RIVERA, an individual;
18 JONATHAN RIVERA, an individual;
19 KEVIN MAURICIO JIMENEZ
20 LONDONO, an individual; BRYAN
21 LEZCANO CHAVERRA, an individual;
22 ERNESTO FIDEL PADILLA, an
23 individual; DIMELO VI LLC, a Puerto
24 Rican Limited Liability Company; VP
25 RECORDS CORPORATION, a Puerto
26 Rican Corporation; JOSE APONTE
27 SANTI. an individual; MR. 305, INC., a
28 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

1 individual; OVO SOUND, LLC, a
2 California Limited Liability Company;
3 FLOW LA MOVIE, INC., a Florida
4 Corporation; ROSALIA VILA I
5 TOBELLA, an individual; JOSE ANGEL
6 LOPEZ MARTINEZ, an individual;
7 SILVESTRE FRANCISCO DANGOND
8 CORRALES, an individual; GEOFFREY
9 ROYCE ROJAS, an individual; LUIS
10 ANTONIO QUINONES GARCIA, an
11 individual; THE ROYALTY NETWORK,
12 INC., a New York Corporation; MANUEL
13 ENRIQUE CORTES CLEGHORN, an
14 individual; WK RECORDS, LLC, a
15 Florida Limited Liability Company; LA
16 BASE MUSIC GROUP, LLC, a Florida
17 Limited Liability Company; and DOES 1 -
18 20,
19 Defendants.

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

23 **Jurisdiction and Venue**

- 24 1. This action arises under the Copyright Act of 1976, 17 U.S.C. § 101, *et*
25 *seq.*
- 26 2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331,
27 1338(a)-(b), and 1367(a).
- 28 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.

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

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

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

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

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

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

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

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

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

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

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

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

22 17. Upon information and belief, Plaintiffs allege that Defendant BMG
23 Rights Management, LLC (“BMG”) is a Delaware Limited Liability company with a
24 principal place of business at 5670 Wilshire Blvd, Suite 1400, Los Angeles, CA
25 90036.

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

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

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

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

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

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

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

25 25. Upon information and belief, Plaintiffs allege that Defendant Juan
26 Carlos Ozuna Rosado p/k/a Ozuna (“Ozuna”) is an individual residing in San Juan,
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1 Puerto Rico and doing business in and with the state of California, including in this
2 judicial district.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

25 47. Upon information and belief, Plaintiffs allege that Defendant Carlos
26 Isaías Morales Williams, p/k/a Sech (“Sech”) is an individual residing in Panama
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1 City, Panama and doing business in and with the state of California, including in this
2 judicial district.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

25 67. Upon information and belief, Plaintiffs allege that Edgar Semper and
26 Defendant Xavier Semper collectively professionally known as the group Mambo
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1 Kingz (“Mambo Kingz”) are individuals living in Puerto Rico and doing business in
2 and with the state of California, including in this district.

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

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

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

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

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

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

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

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

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

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

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

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

25 80. Upon information and belief, Plaintiffs allege that Defendant Daniel
26 Oviedo p/k/a Ovy on the Drums (“Ovy on the Drums”) is an individual residing in
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1 Miami, Florida and doing business in and with the state of California, including in
2 this judicial district.

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

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

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

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

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

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

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

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

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

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

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

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

25 93. Upon information and belief, Plaintiffs allege that Defendant Edwin
26 Vasquez Vega p/k/a Maldy (“Maldy”) is an individual residing in Puerto Rico and
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1 doing business in and with the state of California, including in this judicial district.
2 Chencho and Maldy perform as a duo professionally known as Plan B (“Plan B”).

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

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

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

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

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

25 99. Upon information and belief, Plaintiffs allege that Defendant Camilo
26 Echeverria p/k/a Camilo (“Camilo”) is an individual residing in Miami Florida and
27 doing business in and with the state of California, including in this judicial district.
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1 100. Upon information and belief, Plaintiffs allege that Defendant Concord
2 Music Group, LLC (“Concord”) is a Delaware Limited Liability Company registered
3 to do business in the state of California with an office at 5750 Wilshire Blvd Suite
4 450, Los Angeles, California 90036 and doing business in and with the state of
5 California, including in this judicial district.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

7 115. Upon information and belief, Marcos Ramirez and Victor R. Torres
8 perform and are professionally known as Los Legendarios (collectively “Los
9 Legendarios”).

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

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

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

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

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

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

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

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

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

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

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

26 127. Upon information and belief, Plaintiffs allege that Defendant Glad
27 Empire Live, LLC. (“Glad Empire”) is a Puerto Rican Limited Liability Company
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1 doing business in and with the state of California, including in this judicial district.
2 Upon information and belief, Glad Empire is owned and operated by Get Low
3 Records, LLC a Florida Limited Liability Company.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

13 144. Upon information and belief, Plaintiffs allege that Defendants Yon
14 Madmusick and Yan Madmusick perform and are professionally known together as
15 Madmusick (collectively “Mادمusick”).

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

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

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

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

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

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

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

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

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

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

26 155. Upon information and belief, Plaintiffs allege that Defendant Isolation
27 Network Inc. doing business as Ingrooves Music Group (collectively “Ingrooves”) is
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1 a California Corporation with a principal place of business at 2200 Colorado Ave.
2 Santa Monica, California 90404 and doing business in and with the state of
3 California, including in this judicial district.

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

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

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

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

21 160. Upon information and belief, Plaintiffs allege that Defendant OVO
22 Sound, LLC (“OVO”) is a California Limited Liability Company operating out of
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24 _____
25 ² Service upon Drake is currently the subject of Plaintiffs’ *ex parte* motion (Dkt.
26 299), and should that motion be denied, Drake will be dismissed without prejudice
27 pursuant to the Case Administration Plan (Dkt. 143).
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1 Toronto, Canada and doing business in and with the state of California, including in
2 this judicial district.

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

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

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

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

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

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

26 167. Upon information and belief, Plaintiffs allege that Defendant The
27 Royalty Network, Inc. (“Royalty”) is a New York Corporation registered to do
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1 business in California with an office at 12711 Ventura Blvd. #217, Studio City, CA
2 91604 and doing business in and with the state of California, including in this judicial
3 district.

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

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

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

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

23 172. Upon information and belief, Plaintiffs allege that each of the
24 Defendants was the agent, affiliate, officer, director, manager, principal, alter-ego,
25 and/or employee of the remaining Defendants, and was at all times acting within the
26 scope of such agency, affiliation, alter-ego relationship, and/or employment; and
27 actively participated in, subsequently ratified, and/or adopted the acts or conduct
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1 alleged herein, with full knowledge of all the facts and circumstances of the alleged
2 violations of Plaintiffs' rights and the damages to Plaintiffs proximately caused
3 thereby.

4 **Factual Background**

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

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

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

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

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

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

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

24 180. *Fish Market* is an original work, including, without limitation, an
25 original drum pattern that differentiates it from prior works. *Fish Market* features,
26 *inter alia*, a programmed kick, snare, and hi-hat playing a one bar pattern; percussion
27 instruments, including a tambourine playing through the entire bar, a synthesized
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1 ‘tom’ playing on beats one and three, and timbales that play a roll at the end of every
2 second bar and free improvisation over the pattern for the duration of the song; and a
3 synthesized Bb (b-flat) bass note on beats one and three of each bar, which follows
4 the aforementioned synthesized ‘tom’ pattern. The foregoing combination of
5 elements is original to Mr. Browne and Mr. Johnson and was groundbreaking upon
6 its creation.

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

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

20 183. For the “*Pounder Riddim*,”⁴ Denis Halliburton copied *Dem Bow’s*
21 instrumental, sound, arrangement, and composition, including the drum pattern,
22 the drum components, including the kick, snare, hi-hat, tom and timbales as well as

23 _____
24 ³ See, e.g., Wayne Marshall, “Reggaeton,” pgs. 36-48, Raquel Z. Rivera, Duke
25 University Press (2009).

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

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

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

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

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

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

14 188. *Pounder Riddim* and *Pounder* were released to the U.S. market in 1990
15 on vinyl by the label Shelly's Records in New York. *Pounder* has been widely copied
16 and/or sampled⁵ by the Defendants in this action, and each of them. Transcripts of
17 portions of *Fish Market* and the *Pounder Riddim* are shown below. Any copying,
18 interpolating, or sampling of the *Pounder Riddim* is a copying or interpolation of *Fish*
19 *Market's* composition.

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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).

Fish Market

Steely & Clevie

The musical score for 'Fish Market' is written in 4/4 time. It features a drum set with the following parts: hi hat, tambourine, timbale 1, timbale 2, tom, snare, and kick. The bass line is written in a lower register. The score is divided into two measures by a vertical bar line. The first measure contains the first four beats, and the second measure contains the last four beats. The hi hat and kick play a steady quarter-note pattern. The snare and tom play a pattern of eighth notes and quarter notes. The timbales play a pattern of eighth notes and quarter notes. The tambourine plays a pattern of eighth notes and quarter notes. The bass line plays a pattern of quarter notes and eighth notes.

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

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

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

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

13 193. As set forth below, the Infringing Works can be divided into 59
14 groups—(1) works written, recorded, and performed by the artist El Chombo; (2)
15 works written, recorded, and performed by Luis Fonsi; and (3) works written,
16 recorded, and performed by Daddy Yankee—along with a myriad of additional
17 performers and featured artists on each of the respective works (4) works written,
18 recorded, and performed by Abraham Mateo—along with a myriad of additional
19 performers and featured artists on each of the respective works; (5) works written,
20 recorded, and performed by Alex Sensation—along with a myriad of additional
21 performers and featured artists on each of the respective works; (6) works written,
22 recorded, and performed by Anitta—along with a myriad of additional performers
23 and featured artists on each of the respective works; (7) works written, recorded, and
24 performed by Anuel AA—along with a myriad of additional performers and featured
25 artists on each of the respective works; (8) works written, recorded, and performed by
26 Anuel AA & Ozuna-- along with a myriad of additional performers and featured
27 artists on each of the respective works; (9) works written, recorded, and performed by
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1 Bad Bunny—along with a myriad of additional performers and featured artists on
2 each of the respective works; (10) works written, recorded, and performed by Becky
3 G—along with a myriad of additional performers and featured artists on each of the
4 respective works; (11) works written, recorded, and performed by Cali & El
5 Dandee—along with a myriad of additional performers and featured artists on each of
6 the respective works; (12) works written, recorded, and performed by Camilo—along
7 with a myriad of additional performers and featured artists on each of the respective
8 works; (13) works written, recorded, and performed by Carlos Vives—along with a
9 myriad of additional performers and featured artists on each of the respective works;
10 (14) works written, recorded, and performed by Casper Magico—along with a myriad
11 of additional performers and featured artists on each of the respective works; (15)
12 works written, recorded, and performed by CNCO—along with a myriad of
13 additional performers and featured artists on each of the respective works; (16) works
14 written, recorded, and performed by Dalex—along with a myriad of additional
15 performers and featured artists on each of the respective works; (17) works written,
16 recorded, and performed by Danna Paola—along with a myriad of additional
17 performers and featured artists on each of the respective works; (18) works written,
18 recorded, and performed by Danny Ocean—along with a myriad of additional
19 performers and featured artists on each of the respective works; (19) works written,
20 recorded, and performed by De La Ghetto—along with a myriad of additional
21 performers and featured artists on each of the respective works; (20) works written,
22 recorded, and performed by Dimelo Flow—along with a myriad of additional
23 performers and featured artists on each of the respective works; (21) works written,
24 recorded, and performed by DJ Snake—along with a myriad of additional performers
25 and featured artists on each of the respective works; (22) works written, recorded, and
26 performed by Drake—along with a myriad of additional performers and featured
27 artists on each of the respective works; (23) works written, recorded, and performed
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1 by Enrique Iglesias—along with a myriad of additional performers and featured
2 artists on each of the respective works; (24) works written, recorded, and performed
3 by Farruko—along with a myriad of additional performers and featured artists on
4 each of the respective works; (25) works written, recorded, and performed by Feid—
5 along with a myriad of additional performers and featured artists on each of the
6 respective works; (26) works written, recorded, and performed by Gente De La
7 Zona—along with a myriad of additional performers and featured artists on each of
8 the respective works; (27) works written, recorded, and performed by Greeicy—
9 along with a myriad of additional performers and featured artists on each of the
10 respective works; (28) works written, recorded, and performed by Ivy Queen—along
11 with a myriad of additional performers and featured artists on each of the respective
12 works; (29) works written, recorded, and performed by J Balvin—along with a
13 myriad of additional performers and featured artists on each of the respective works;
14 (30) works written, recorded, and performed by Jason Derulo—along with a myriad
15 of additional performers and featured artists on each of the respective works; (31)
16 works written, recorded, and performed by Jawsh 685—along with a myriad of
17 additional performers and featured artists on each of the respective works; (32) works
18 written, recorded, and performed by Jay Wheeler—along with a myriad of additional
19 performers and featured artists on each of the respective works; (33) works written,
20 recorded, and performed by Jhay Cortez—along with a myriad of additional
21 performers and featured artists on each of the respective works; (34) works written,
22 recorded, and performed by Justin Quiles—along with a myriad of additional
23 performers and featured artists on each of the respective works; (35) works written,
24 recorded, and performed by Karol G—along with a myriad of additional performers
25 and featured artists on each of the respective works; (36) works written, recorded, and
26 performed by Lenny Tavarez—along with a myriad of additional performers and
27 featured artists on each of the respective works; (37) works written, recorded, and
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1 performed by Los Legendarios—along with a myriad of additional performers and
2 featured artists on each of the respective works; (38) works written, recorded, and
3 performed by Major Lazer—along with a myriad of additional performers and
4 featured artists on each of the respective works; (39) works written, recorded, and
5 performed by Maluma—along with a myriad of additional performers and featured
6 artists on each of the respective works; (40) works written, recorded, and performed
7 by Manuel Turizo—along with a myriad of additional performers and featured artists
8 on each of the respective works; (41) works written, recorded, and performed by
9 Myke Towers—along with a myriad of additional performers and featured artists on
10 each of the respective works; (42) works written, recorded, and performed by Natti
11 Natasha—along with a myriad of additional performers and featured artists on each
12 of the respective works; (43) works written, recorded, and performed by Nicky
13 Jam—along with a myriad of additional performers and featured artists on each of the
14 respective works; (44) works written, recorded, and performed by Ozuna—along
15 with a myriad of additional performers and featured artists on each of the respective
16 works; (45) works written, recorded, and performed by Paulo Londra—along with a
17 myriad of additional performers and featured artists on each of the respective works;
18 (46) works written, recorded, and performed by Pitbull—along with a myriad of
19 additional performers and featured artists on each of the respective works; (47) works
20 written, recorded, and performed by Rauw Alejandro—along with a myriad of
21 additional performers and featured artists on each of the respective works; (48) works
22 written, recorded, and performed by Reik—along with a myriad of additional
23 performers and featured artists on each of the respective works; (49) works written,
24 recorded, and performed by Ricky Martin—along with a myriad of additional
25 performers and featured artists on each of the respective works; (50) works written,
26 recorded, and performed by Rosalia—along with a myriad of additional performers
27 and featured artists on each of the respective works; (51) works written, recorded, and
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1 performed by Sech—along with a myriad of additional performers and featured
2 artists on each of the respective works; (52) works written, recorded, and performed
3 by Silvestre Dangond—along with a myriad of additional performers and featured
4 artists on each of the respective works; (53) works written, recorded, and performed
5 by Sky—along with a myriad of additional performers and featured artists on each of
6 the respective works; (54) works written, recorded, and performed by Wisin—along
7 with a myriad of additional performers and featured artists on each of the respective
8 works; (55) works written, recorded, and performed by Wisin & Yandel—along with
9 a myriad of additional performers and featured artists on each of the respective
10 works; (56) works written, recorded, and performed by Wolfine—along with a
11 myriad of additional performers and featured artists on each of the respective works;
12 (57) works written, recorded, and performed by Yandel—along with a myriad of
13 additional performers and featured artists on each of the respective works; (58) works
14 written, recorded, and performed by Zion & Lennox—along with a myriad of
15 additional performers and featured artists on each of the respective works.

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

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

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

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

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

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

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

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

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

26 214. On or about October 19, 2018, UMG released the Luis Fonsi single
27 entitled *Imposible*. Upon information and belief, Plaintiffs allege that *Imposible* was
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1 written, recorded, produced, distributed, and/or exploited by Defendants UMG, Sony,
2 Luis Fonsi, El Dandee, Torres, and Ozuna.

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

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

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

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

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

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

25 221. The rhythm section of *Bésame* copies original elements of the *Fish*
26 *Market* rhythm section, including the original combination of drum patterns featured
27 in *Fish Market*—among other things, the kick, snare, and hi-hat patterns and the
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1 sixteenth notes on the ‘and’ of beat one (from a hi-hat sound substituted for the
2 corresponding snare in *Fish Market*); the kick drum, which plays four crotchets per
3 bar beginning on the first beat of each bar, as in *Fish Market*; and bongos, which are
4 substituted for the corresponding timbales pattern in *Fish Market*, playing a rapid
5 burst phrase ending the fourth bar. The drum and bass tracks, together and
6 independently, are substantially similar in rhythmic structures and texture to the same
7 tracks in *Fish Market*. The kick, snare, hi-hat, and bass are prominent in the mix of
8 *Bésame*, which emulates the sonic texture of *Fish Market*. And the bassline anchors
9 beats one and three, as in *Fish Market*. Because these copied elements form the
10 backbone of *Bésame*, significant portions of *Bésame* are substantially similar, if not
11 virtually identical, to significant portions of *Fish Market*, as set forth in the
12 transcripts below.

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Fish Market

Steely & Clevie

The musical score for 'Fish Market' is presented in a multi-staff format. The top seven staves represent the drum kit: hi hat, tambourine, timbale 1, timbale 2, tom, snare, and kick. The eighth staff is the bass line. The music is in 4/4 time and consists of two measures. The hi hat, snare, and kick parts feature a consistent rhythmic pattern of quarter notes. The tambourine and timbale parts have more complex, syncopated rhythms. The bass line is a simple, steady pattern of quarter notes.

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Besame

DRUM & BASS EXCERPT - BARS 1 & 2

The musical score is for 'Besame' and is a drum and bass excerpt for bars 1 and 2. It is written in 4/4 time with a tempo of quarter note = 70. The score consists of five drum parts and one bass part. The hi hat part has a pattern of eighth notes on the 'and' of each beat. The tom part has a pattern of eighth notes on the 'and' of each beat. The snare part has a pattern of eighth notes on the 'and' of each beat. The kick part has a pattern of quarter notes on the downbeats. The bass part has a pattern of quarter notes on the downbeats. Two large black arrows point from the first two notes of the hi hat staff down to the first two notes of the snare staff, indicating a rhythmic relationship.

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.

Fish Market

Steely & Clevie

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Musical score for the drum set of 'Fish Market'. The score is in 4/4 time and consists of two measures. The instruments and their parts are: hi hat (quarter notes), tambourine (eighths and sixteens), timbale 1 (quarter notes with accents), timbale 2 (quarter notes with accents), tom (quarter notes with accents), snare (quarter notes with accents), kick (quarter notes), and bass (quarter notes).

Calypso

DRUM & BASS EXCERPT AT APPROX. 1:08

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Musical score for the drum and bass excerpt of 'Calypso'. The score is in 4/4 time and consists of two measures. The instruments and their parts are: hi hat (rest), tom (rest), snare (quarter notes with accents), kick (quarter notes), and synth bass (quarter notes).

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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

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

Fish Market

Steely & Clevie

The musical score for 'Fish Market' by Steely & Clevie is presented in a 2/4 time signature. It features seven staves for percussion: hi hat, tambourine, timbale 1, timbale 2, tom, snare, and kick, plus a bass line. The hi hat, snare, and kick parts show a consistent rhythmic pattern across two measures. The tom part has a specific pattern on beats 1 and 3. The tambourine and timbale parts have more complex, syncopated rhythms. The bass line is in the bass clef and features a simple pattern on beats 1 and 3.

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DATE LA VUELTA

DRUM & BASS EXCERPT- BARS 7 & 8

The musical score for 'DATE LA VUELTA' (Drum & Bass Excerpt - Bars 7 & 8) consists of five drum parts and one bass part. The hi hat part features a steady eighth-note pattern. The tom part has a pattern of eighth notes and rests. The snare part plays a complex eighth-note pattern. The kick part plays a simple eighth-note pattern. The bass part is a single-line bass line in a 4/4 time signature, primarily playing on beats one and three.

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.

Fish Market

Steely & Clevie

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Musical score for 'Fish Market' in 4/4 time. The score includes parts for hi hat, tambourine, timbale 1, timbale 2, tom, snare, kick, and bass. The hi hat and kick play a steady quarter-note pattern. The snare plays a syncopated pattern. The bass line consists of quarter notes on beats 1 and 3.

Despacito

DRUM & BASS EXCERPT - BAR 40 verse 2
START TIME APPROXIMATELY 1:46

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Musical score for 'Despacito' excerpt in 4/4 time. The score includes parts for hi hat, efx, timbale, tom, snare, kick, and bass. The tempo is marked as quarter note = 89. The hi hat and kick play a steady quarter-note pattern. The snare plays a syncopated pattern. The bass line consists of quarter notes on beats 1 and 3.

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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

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

Fish Market

Steely & Clevie

Musical score for 'Fish Market' by Steely & Clevie. The score is in 2/4 time and consists of two measures. The instruments and their parts are:

- hi hat:** A steady quarter-note pattern.
- tambourine:** A complex rhythmic pattern with eighth and sixteenth notes.
- timbale 1:** A pattern of eighth notes with accents.
- timbale 2:** A pattern of eighth notes with accents, mirroring timbale 1.
- tom:** A pattern of quarter notes with accents.
- snare:** A pattern of eighth notes with accents.
- kick:** A steady quarter-note pattern.
- Bass:** A bass line in the bottom staff with quarter notes.

ECHAME LA CULPA

DRUM & BASS EXCERPT FROM CHORUS AT BAR 29
START TIME APPROXIMATELY 1:26

Musical score for 'Echame La Culpa' (Drum & Bass excerpt). The score is in 2/4 time and consists of two measures. The instruments and their parts are:

- hi hat:** A steady quarter-note pattern.
- timb.:** A pattern of quarter notes with accents.
- efx:** A pattern of eighth notes with accents.
- snare 2:** A pattern of quarter notes with accents.
- snare 1:** A pattern of eighth notes with accents.
- kick:** A steady quarter-note pattern.
- Bass:** A bass line in the bottom staff with quarter notes.

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

Fish Market

Steely & Clevie

Musical score for *Fish Market* showing drum and bass tracks. The score is in 4/4 time and consists of two measures. The instruments are hi hat, tambourine, timbale 1, timbale 2, tom, snare, kick, and bass. The hi hat, snare, and kick tracks show a consistent rhythmic pattern. The bass line is in the key of B-flat major and features a prominent anchor on beats one and three.

Impossible

DRUM & BASS EXCERPT - BAR 9
START TIME APPROXIMATELY 0:36

Musical score for *Impossible* showing drum and bass tracks. The score is in 4/4 time and consists of two measures. The instruments are hi hat, tom, snare 2, snare 1, kick, and bass. The hi hat, tom, snare, and kick tracks show a consistent rhythmic pattern. The bass line is in the key of D major and features a prominent anchor on beats one and three.

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

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Fish Market

Steely & Clevie

The musical score for the rhythm section of "Fish Market" is presented in 4/4 time. It features seven staves: hi hat, tambourine, timbale 1, timbale 2, tom, snare, and kick. The hi hat and kick play a simple four-beat pattern. The snare plays a more complex pattern with accents. The tambourine and timbales play intricate patterns with many sixteenth notes. The tom plays a pattern of accents. A bass line is shown at the bottom of the score.

Perfecta
Drum & Bass Excerpt - Bars 2 & 3

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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.

Fish Market

Steely & Clevie

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The musical score for 'Fish Market' consists of two bars of music. The percussion parts are as follows:

- hi hat:** Four quarter notes in each bar.
- tambourine:** A rhythmic pattern of eighth and sixteenth notes.
- timbale 1:** A rhythmic pattern of eighth and sixteenth notes.
- timbale 2:** A rhythmic pattern of eighth and sixteenth notes.
- tom:** Quarter notes on beats 1 and 3.
- snare:** A rhythmic pattern of eighth and sixteenth notes.
- kick:** Quarter notes on beats 1 and 3.
- bass:** A bassline with quarter notes on beats 1 and 3.

Sola

DRUM & BASS EXCERPT - BARS 1 & 2

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The musical score for 'Sola' consists of two bars of music. The percussion and bass parts are as follows:

- Percussion:** A rhythmic pattern of eighth and sixteenth notes.
- efx (fngpr snps):** A rhythmic pattern of eighth and sixteenth notes.
- snare:** A rhythmic pattern of eighth and sixteenth notes.
- kick:** Quarter notes on beats 1 and 3.
- bass:** A bassline with quarter notes on beats 1 and 3.

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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*

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

5 **Fish Market**

Steely & Clevie

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15 **VACIO**

16 DRUM & BASS EXCERPT - BAR 34 & 35
START TIME APPROXIMATELY 1:47

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24 **Daddy Yankee Claims**

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

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

20 232. On or about June 20, 2002, El Cartel released the song *Latigazo*. Upon
21 information and belief, Plaintiffs allege that *Latigazo* was written, recorded,
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23 ⁶ DJ Playero is credited as one of the originators of reggaeton with the mixtapes
24 *Playero 37* from 1993 (which featured reggae dancehall riddims released subsequent
25 to *Poco Man Jam*, such as *Armshouse Riddim* (1993), *Pitch Riddim* (1992), *Make*
26 *Hay Riddim* (1993), *Bam Bam Riddim* (1992) (on which Defendant Daddy Yankee
27 was recorded), *Big Up Riddim* (1992) and *Hot This Year Riddim* (1992), etc.) and
28 *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).

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

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

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

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

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

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

20 238. On or about July 13, 2004, El Cartel released the song *No Me Dejes*
21 *Solo*. Upon information and belief, Plaintiffs allege that *No Me Dejes Solo* was
22 written, recorded, produced, distributed, and/or exploited by Defendants El Cartel,
23 GPC, Daddy Yankee, Wisin, Yandel, and DJ Urba. Copied elements from *Fish*
24 *Market*, including the original combination of drum and bass patterns featured in *Fish*
25 *Market* (that, upon information and belief, are audio samples of the *Pounder* and/or
26 *Fish Market*), form the backbone of *No Me Dejes Solo*. Accordingly, significant
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1 portions of *No Me Dejes Solo* are substantially similar, if not virtually identical, to
2 significant portions of *Fish Market*.

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

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

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

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

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

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

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

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

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

26 248. On or about October 29, 2013, El Cartel released the single “*La Rompe*
27 *Carros*”. Upon information and belief, Plaintiffs allege that *La Rompe Carros* was
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1 written, recorded, produced, distributed and/or exploited by Defendants El Cartel,
2 GPC, Daddy Yankee, Luny, and Tunes. Copied elements from *Fish Market*,
3 including the original combination of drum and bass patterns featured in *Fish Market*
4 (that appear to be at least partially provided by an audio sample of the *Pounder*),
5 form the backbone of *La Rompe Carros* and accordingly, significant portions of *La*
6 *Rompe Carros* are substantially similar if not virtually identical to significant
7 portions of *Fish Market*.

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

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

22 251. On or about October 13, 2013, El Cartel released the single “*Nada Ha*
23 *Cambiado*”. Upon information and belief, Plaintiffs allege that *Nada Ha Cambiado*
24 was written, recorded, produced, distributed and/or exploited by Defendants El
25 Cartel, GPC, and Daddy Yankee. Copied elements from *Fish Market* (that, upon
26 information and belief, are audio samples of the *Pounder* and/or *Fish Market*) form
27 the backbone of *Nada Ha Cambiado* and accordingly, significant portions of *Nada*
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1 *Ha Cambiado* are substantially similar if not virtually identical to significant portions
2 of *Fish Market*.

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

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

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

25 255. On or about January 24, 2019, UMG and El Cartel released the single
26 “*Con Calma*”. Upon information and belief, Plaintiffs allege that *Con Calma* was
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1 written, recorded, produced, distributed and/or exploited by Defendants UMG, El
2 Cartel, GPC, Warner, Daddy Yankee, Play, and Skillz.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

23 273. On or about July 13, 2004, UMG and El Cartel released the single
24 “*Golpe de Estado*”. Upon information and belief, Plaintiffs allege that *Golpe de*
25 *Estado* was written, recorded, produced, distributed and/or exploited by Defendants
26 El Cartel, GPC, Daddy Yankee, UMG, Yandel, Luny, and Tunes. *Golpe de Estado*
27 includes elements that are substantially similar if not virtually identical to significant
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1 portions of *Dem Bow*, including the lyrical portions of *Dem Bow*. Additionally,
2 copied elements from *Fish Market* (that appear to be at least partially provided by an
3 audio sample of the *Pounder*) form the backbone of *Golpe de Estado* and
4 accordingly, significant portions of *Golpe de Estado* are substantially similar if not
5 virtually identical to significant portions of *Fish Market*.

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

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

20 276. *Adictiva, Con Calma, Definitivamente, Don Don, Dura, El Pony,*
21 *Gasolina, Hula Hoop, La Rompe Corazones, Lo Que Pasó, Pasó, Métele Al Perreo,*
22 *Muévelo, Problema, Que Tire Pa' 'Lante, Shaky Shaky, Si Supieras, Sígueme y Te*
23 *Sigo, Zum Zum, After Party, Alerta Roja, Camuflash, Cuéntame, Dale Caliente,*
24 *Desafío, Dos Mujeres, El Empuje, Gangsta Zone, Guaya, King Daddy, La Rompe*
25 *Carros, Latigazo, Llegamos a la Disco, Machete, Nada Ha Cambiado, No Me Dejes*
26 *Solo, Perros Salvajes, Po' Encima, ¿Que Vas Hacer?, Quiero Decirte, Rompe, Te*
27 *Ves Bien, Golpe de Estado, and Calenton* (collectively the “Daddy Yankee Works”)
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1 incorporates an unauthorized sample of the *Fish Market* recording and/or a verbatim
2 copy of the *Fish Market* composition as the primary rhythm / drum section of the
3 Daddy Yankee Work. The Daddy Yankee Works and the parties responsible are also
4 depicted in Exhibit A attached hereto.

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

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

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

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Fish Market
Steely & Clevie

The musical score for 'Fish Market' by Steely & Clevie is written in 2/4 time. It features seven drum parts: hi hat, tambourine, timbale 1, timbale 2, tom, snare, and kick. The hi hat part consists of a steady eighth-note pattern. The tambourine part features a complex eighth-note pattern with accents. The timbale 1 part has a pattern of eighth notes with accents. The timbale 2 part has a pattern of eighth notes with accents. The tom part has a pattern of eighth notes with accents. The snare part has a pattern of eighth notes with accents. The kick part has a pattern of eighth notes with accents.

Adictiva
Excerpt as at approx. 0:21

The musical score for 'Adictiva' is an excerpt in 4/4 time. It features three drum parts: drum efx, rim click, and kick. The drum efx part has a pattern of eighth notes with accents. The rim click part has a pattern of eighth notes with accents. The kick part has a pattern of eighth notes with accents.

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

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

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Fish Market

Steely & Clevie

The musical score is for the song "Fish Market" by Steely & Clevie. It features a 4/4 time signature and a key signature of one flat (B-flat). The score is divided into two measures. The instruments and their parts are as follows:

- hi hat:** A steady eighth-note pattern.
- tambourine:** A complex rhythmic pattern with eighth and sixteenth notes.
- timbale 1:** A pattern of eighth notes with rests.
- timbale 2:** A pattern of eighth notes with rests, including some triplets.
- tom:** A pattern of eighth notes with rests, primarily on the downbeats.
- snare:** A pattern of eighth notes with rests, including some triplets.
- kick:** A pattern of eighth notes with rests, primarily on the downbeats.
- Bass:** A minimalist line with eighth notes and rests, primarily on the downbeats.

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Con Calma
Excerpt as at approx. 1:06

♩ = 94

hi hat
timbale
tom
snare 1
kick

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

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Musical score for the 'Fish Market' section, measures 1 through 11. The score includes parts for hi hat, tambourine, timbale 1, timbale 2, tom, snare, kick, and bass. The key signature is one flat (Bb) and the time signature is 4/4. The music is written in a standard staff format with various rhythmic notations including eighth and sixteenth notes, rests, and accents.

Definitivamente

♩ = 100

Musical score for the 'Definitivamente' section, measures 13 through 16. It features two parts: Maracas and Tambourine. The Maracas part has a tempo marking of ♩ = 100. Orange arrows point from the Maracas notes to the corresponding notes in the Tambourine part, indicating synchronization. The key signature is one flat (Bb) and the time signature is 4/4.

Definitivamente

Excerpt as at approx. 1:57

♩ = 100

Musical score for the 'Definitivamente' section, measures 20 through 24. It features four parts: Maracas, Rim, Kick, and Bass. The Maracas part has a tempo marking of ♩ = 100. The key signature is one flat (Bb) and the time signature is 4/4.

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

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Fish Market

Steely & Clevie

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The musical score for 'Fish Market' is written in 4/4 time. It features seven drum parts and a bass line. The hi hat part consists of a steady eighth-note pattern. The tambourine part features a complex eighth-note pattern with accents. Timbale 1 has a pattern of eighth notes with accents. Timbale 2 has a pattern of eighth notes with accents and rests. The tom part has a pattern of eighth notes with accents. The snare part has a pattern of eighth notes with accents. The kick part has a steady eighth-note pattern. The bass line is in the key of B-flat major and features a simple eighth-note pattern.

Don Don

♩ = 105 Excerpt as at approx.0:39

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The musical score for 'Don Don' is written in 4/4 time. It features four drum parts and a bass line. The hi hat part consists of a steady eighth-note pattern. The rim click part has a pattern of eighth notes with accents. The kick part has a steady eighth-note pattern. The bass line is in the key of B-flat major and features a simple eighth-note pattern.

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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*

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

Fish Market

Steely & Clevie

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The musical score for 'Fish Market' shows a drum track in 4/4 time. The instruments listed are hi hat, tambourine, timbale 1, timbale 2, tom, snare, and kick. The hi hat plays a steady eighth-note pattern. The tambourine plays a complex pattern of eighth and sixteenth notes. The timbales play syncopated patterns. The tom plays a simple pattern of quarter notes. The snare plays a pattern of eighth notes. The kick plays a pattern of quarter notes. The bass line is shown at the bottom, consisting of a simple two-note pattern on beats one and three.

Dura

Excerpt as at approx.0:41

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The musical score for 'Dura' shows a drum track in 4/4 time. The instruments listed are hi hat, synth tom, snare 2, snare 1, and kick. The hi hat plays a steady eighth-note pattern. The synth tom plays a pattern of quarter notes. The snare 2 plays a pattern of eighth notes. The snare 1 plays a pattern of eighth notes. The kick plays a pattern of quarter notes. The score also includes a bass line in the bottom two staves, showing a two-note pattern on beats one and three.

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

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Fish Market

Steely & Clevie

The image shows a musical score for the song "Fish Market" by Steely & Clevie. The score is written for a rhythm section and includes parts for hi hat, tambourine, timbale 1, timbale 2, tom, snare, kick, and bass. The music is in 2/4 time and consists of two measures. The hi hat part features a steady eighth-note pattern. The tambourine part has a similar eighth-note pattern with occasional accents. The timbale 1 part has a pattern of eighth notes with accents. The timbale 2 part has a pattern of eighth notes with accents. The tom part has a pattern of eighth notes with accents. The snare part has a pattern of eighth notes with accents. The kick part has a pattern of eighth notes with accents. The bass part has a pattern of eighth notes with accents.

El Pony
Excerpt as at 1:19

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2 $\text{♩} = 77$

3 hi hat

4 timbale

5 snare 2

6 snare 1

7 kick

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10 285. The rhythm section of *Gasolina* copies original elements of the *Fish*

11 *Market* rhythm section, including the original combination of drum patterns featured

12 in *Fish Market*. These purloined elements include, without limitation, the kick, and

13 snare patterns of *Fish Market*. The kick drum of *Gasolina* plays four crotchets per bar

14 beginning on the first beat of each bar as in *Fish Market*. The hi-hat maintains the

15 main accents of the *Fish Market* hi-hat pattern played on beats one, two, three and

16 four of each bar, with additional 8th notes replacing the missing 8th notes as played

17 on the *Fish Market* snare pattern. Despite the substitution of hi-hat for snare drum on

18 the 2nd and 6th 8th notes of each bar, the rhythm of the combined elements result is

19 the same as *Fish Market*. The combination of the snare drum and hi-hat pattern as

20 played in *Gasolina* gives the same snare and hi-hat audio overlay effect as the pattern

21 played in *Fish Market*. The arrows in the *Gasolina* notation, emanates from the hi-hat

22 substitution note and points to the location where the snare is played in *Fish Market*.

23 The bongos in *Gasolina* serves to substitute the timbales played in *Fish Market* with

24 a slight variation to the pattern. However, despite the substitution of sound, the bongo

25 drum serves well at capturing the overall feel and sonic characteristics found in *Fish*

26 *Market*. Synth tom is played on beats one and three at various points throughout

27 *Gasolina*, copying the *Fish Market* tom pattern. *Example 0:20 - 0:28, 0:40 - 0:48,

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

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Fish Market

Steely & Clevie

The image displays a musical score for the song "Fish Market" by Steely & Clevie. It features seven drum tracks and one bass track. The drum tracks are labeled: hi hat, tambourine, timbale 1, timbale 2, tom, snare, and kick. The bass track is at the bottom. The score is divided into two measures by a vertical bar line. The hi hat track shows a steady eighth-note pattern. The tambourine track has a complex rhythmic pattern with many sixteenth notes. The timbale 1 track has a pattern of eighth notes with accents. The timbale 2 track has a pattern of eighth notes with accents. The tom track has a pattern of eighth notes with accents. The snare track has a pattern of eighth notes with accents. The kick track has a pattern of eighth notes with accents. The bass track has a simple pattern of eighth notes with accents.

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Gasolina
Excerpt as at approx. 0:31

The musical score is for the song "Gasolina" and is an excerpt starting at approximately 0:31. It is written in 4/4 time with a tempo of 96 beats per minute. The score includes parts for hi hat, bongo, snare 2, snare 1, kick, and bass. The hi hat, snare 2, and kick parts play a consistent pattern of quarter notes on beats 1, 2, 3, and 4. The snare 1 part plays a pattern of eighth notes with rests. The bongo part plays a pattern of eighth notes with rests. The bass part plays a pattern of quarter notes on beats 1 and 3, with rests on beats 2 and 4.

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.

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Fish Market

Steely & Clevie

The musical score for 'Fish Market' is written in 4/4 time. It features seven drum parts and a bass line. The hi hat part consists of a steady eighth-note pattern. The tambourine part features a complex rhythmic pattern with sixteenth notes and accents. The timbale 1 part has a pattern of eighth notes with accents. The timbale 2 part has a pattern of eighth notes with accents. The tom part has a pattern of eighth notes with accents. The snare part has a pattern of eighth notes with accents. The kick part has a pattern of eighth notes. The bass line is a simple eighth-note pattern.

Hula Hoop

Excerpt as at approx. 0:22

The musical score for 'Hula Hoop' is written in 4/4 time. It features five drum parts and a piano accompaniment. The hi hat part consists of a steady eighth-note pattern. The tom part has a pattern of eighth notes with accents. The snare 2 part has a pattern of eighth notes with accents. The snare 1 part has a pattern of eighth notes with accents. The kick part has a pattern of eighth notes. The piano accompaniment consists of a simple eighth-note pattern.

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

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

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Fish Market

Steely & Clevie

Musical score for *Fish Market* percussion and bass line. The score is in 2/4 time and consists of two measures. The instruments are hi hat, tambourine, timbale 1, timbale 2, tom, snare, kick, and bass. The hi hat, snare, and kick parts show a consistent rhythmic pattern of quarter notes on downbeats. The tom part features a pattern of quarter notes on downbeats. The bass line is a simple, minimalist structure of quarter notes on downbeats.

La Rompe Corazones

♩ = 88 Excerpt as at approx. 0:46

Musical score for *La Rompe Corazones* percussion and bass line. The score is in 4/4 time and consists of two measures. The instruments are hi hat, tom, Percussion, snare 1, kick, and bass. The hi hat, tom, and kick parts show a consistent rhythmic pattern of quarter notes on downbeats. The snare 1 part features a pattern of quarter notes on downbeats. The bass line is a simple, minimalist structure of quarter notes on downbeats.

1 288. The rhythm section of *Lo Que Pasó, Pasó* copies original elements of
2 the *Fish Market* rhythm section, including the original combination of drum patterns
3 featured in *Fish Market*. These purloined elements include, without limitation, the
4 kick drum, snare drum, hi-hat, timbales and synth tom patterns of *Fish Market*,
5 replicating the same combined patterns as contained in *Fish Market*, with the
6 exception of a maracas replacing the tambourine in *Fish Market*. *Lo Que Pasó, Pasó*
7 is composed of layered elements of drums which includes programmed drums and
8 sampled drum loops. The kick drum plays on beats one, two, three and four of each
9 bar complemented by the original *Fish Market* snare pattern as shown in the attached
10 notation excerpt. The hi-hat and maracas in combination, seems aimed at capturing
11 the hi-hat and tambourine pattern in *Fish Market*. However, the instrument interplay
12 in *Lo Que Pasó, Pasó* is not definitively clear, therefore the notation excerpt
13 combines both patterns on a single line of the score; here notated as a combined
14 pattern on the hi-hat line. The timbale pattern is the same unique original pattern
15 contained in *Fish Market*. Synth tom is played on beats one and three as in *Fish*
16 *Market*. The bass plays on all four beats of each bar with notes in line with the new
17 chord structure. However, the track also features a ‘mid-range frequency’ second bass
18 track playing on beats one and three as in *Fish Market*. The drum and bass tracks
19 both together and independently, are substantially similar in rhythmic structures and
20 texture to those of *Fish Market*. The kick, snare, hi-hat and bass are prominent in the
21 mix of *Lo Que Pasó, Pasó* which emulates the sonic texture of *Fish Market*, giving
22 the song a similar feel. The sonic elements as contained in the looped drum samples,
23 are indicative of a frequency manipulated audio sample in which the low frequencies
24 are reduced. This procedure may have been applied to allow for masking of bass note
25 clashes. This can be beneficial to musical outcomes particularly in cases in which the
26 key of a ‘bass heavy’ sample is different from that of the new work in which the
27 sample is applied. In this case, the key is Eb as opposed to Bb in the case of *Fish*
28

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

9 **Fish Market**

10 Steely & Clevie

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The image displays a musical score for the song "Fish Market" by Steely & Clevie. The score is written for a drum set and a bass line. The drum parts include hi hat, tambourine, timbale 1, timbale 2, tom, snare, and kick. The bass line is written in bass clef. The score is divided into two measures by a vertical bar line. The time signature is 4/4. The key signature has one flat (B-flat). The hi hat part consists of a steady quarter-note pattern. The tambourine part features a complex rhythmic pattern with eighth and sixteenth notes. The timbale 1 part has a pattern of eighth and quarter notes. The timbale 2 part has a pattern of quarter and eighth notes. The tom part has a pattern of quarter and eighth notes. The snare part has a pattern of eighth and quarter notes. The kick part has a pattern of quarter and eighth notes. The bass line has a pattern of quarter and eighth notes.

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Lo Que Paso
Excerpt as at approx. 1:10

The musical score for 'Lo Que Paso' is presented in a multi-staff format. It includes six drum parts and a bass line. The tempo is marked as quarter note = 97. The time signature is 4/4. The drum parts are: hi hat (continuous sixteenth-note pattern), timbale (alternating eighth-note patterns), tom (quarter notes on beats 1 and 3), snare 2 (quarter notes on beats 1 and 3), snare 1 (quarter notes on beats 1 and 3), and kick (quarter notes on beats 1 and 3). The bass line is in a key with four flats and consists of quarter notes on beats 1 and 3 of each bar.

289. The rhythm section of *Métele 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 *Métele 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 *Métele 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 *Métele Al Perreo* key and chord structure. The *Métele Al Perreo* drum and bass tracks deliver retains the rhythmic structures and texture of *Fish Market*. These copied elements form the backbone of *Métele Al Perreo* and accordingly, significant portions of *Métele 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.

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Fish Market

Steely & Clevie

Musical score for 'Fish Market' in 2/4 time. The score includes parts for hi hat, tambourine, timbale 1, timbale 2, tom, snare, and kick. The hi hat plays a steady quarter-note pattern. The tambourine plays a complex rhythmic pattern with eighth and sixteenth notes. The timbales play syncopated patterns. The tom plays a simple quarter-note pattern. The snare plays a pattern of eighth notes. The kick plays a simple quarter-note pattern.

Metele Al Perreo

Excerpt as at approx. 2:13

Musical score for 'Metele Al Perreo' in 4/4 time, marked with a tempo of quarter note = 90. The score includes parts for hi hat, tom, snare 1, and kick. The hi hat plays a steady quarter-note pattern. The tom plays a simple quarter-note pattern. The snare 1 plays a pattern of eighth notes. The kick plays a simple quarter-note pattern.

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

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

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Fish Market
Steely & Clevie

The musical score for 'Fish Market' is written in 4/4 time. It features seven staves for percussion and one for bass. The hi-hat plays a steady quarter-note pattern. The tambourine plays a complex eighth-note pattern. Timbale 1 and 2 have specific rhythmic patterns. The tom plays a pattern of quarter notes on beats 1 and 3. The snare plays a pattern of eighth notes. The kick plays a pattern of quarter notes on beats 1 and 3. The bass line is a simple, minimalist pattern of quarter notes on beats 1 and 3.

Muevelo
Excerpt as at approx. 1:54

$\text{♩} = 94$

The musical score for 'Muevelo' is written in 4/4 time. It features six staves for percussion and one for bass. The hi-hat plays a steady quarter-note pattern. The timbale plays a pattern of eighth notes. The tom plays a pattern of quarter notes on beats 1 and 3. The snare 2 plays a pattern of eighth notes. The snare 1 plays a pattern of eighth notes. The kick plays a pattern of quarter notes on beats 1 and 3. The bass line is a simple, minimalist pattern of quarter notes on beats 1 and 3.

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

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

6 **Fish Market**

Steely & Clevie

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The musical score for 'Fish Market' is presented in a standard musical notation format. It features seven staves for percussion instruments: hi hat, tambourine, timbale 1, timbale 2, tom, snare, and kick. The time signature is 2/4. The hi hat part consists of a steady eighth-note pattern. The tambourine part features a complex rhythmic pattern with many sixteenth notes and accents. The timbale 1 part has a pattern of eighth notes with accents. The timbale 2 part has a pattern of eighth notes with accents. The tom part has a pattern of eighth notes with accents. The snare part has a pattern of eighth notes with accents. The kick part has a pattern of eighth notes with accents. The score is divided into two measures by a vertical bar line.

15 **Problema**

Excerpt as at approx. 0:32

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The musical score for 'Problema' is presented in a standard musical notation format. It features five staves for percussion instruments: hi hat, tom, snare 2, snare 1, and kick. The time signature is 2/4. The hi hat part consists of a steady eighth-note pattern. The tom part has a pattern of eighth notes with accents. The snare 2 part has a pattern of eighth notes with accents. The snare 1 part has a pattern of eighth notes with accents. The kick part has a pattern of eighth notes with accents. The score is divided into two measures by a vertical bar line. A tempo marking of quarter note = 90 is present at the beginning of the score.

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

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FISH MARKET

Steely & Clevie

Musical score for 'Fish Market' featuring two timbales. The score is in 4/4 time and consists of two measures. Timbale 1 plays a rhythmic pattern of eighth notes and quarter notes. Timbale 2 plays a similar pattern, often in a lower register or with different articulation.

Fish Market

Steely & Clevie

Full drum set score for 'Fish Market' in 2/4 time. The score includes parts for hi hat, tambourine, timbale 1, timbale 2, tom, snare, kick, and bass. The hi hat, snare, and kick play steady rhythmic patterns. The timbales play more complex eighth-note patterns. The bass line provides a simple harmonic accompaniment.

Que Tire Pa' 'Lante Excerpt as at approx. 3:24

Drum set score for 'Que Tire Pa' 'Lante' in 2/4 time, marked with a tempo of quarter note = 94. The score includes parts for hi hat, tom, snare 1, kick, and bass. The hi hat, snare, and kick play steady rhythmic patterns. The tom plays a simple pattern. The bass line provides a simple harmonic accompaniment.

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*

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

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Shaky Shaky

$\text{♩} = 88$

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

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Shaky Shaky
Excerpt as at approx. 3:38

The musical score is for the song 'Shaky Shaky' and is an excerpt from approximately 3:38. It is written in 4/4 time with a tempo of 88 beats per minute. The score includes parts for hi hat, tom, snare 3, snare 2, snare 1, kick, and bass. The hi hat part consists of eighth notes on beats 1, 2, 3, and 4. The tom part has quarter notes on beats 1 and 3. The snare 3 part has quarter notes on beats 2 and 4. The snare 2 and snare 1 parts have eighth notes on beats 1, 2, 3, and 4. The kick part has quarter notes on beats 1 and 3. The bass part has quarter notes on beats 1 and 3.

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.

Fish Market

Steely & Clevie

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Musical score for 'Fish Market' in 2/4 time. The score includes parts for hi hat, tambourine, timbale 1, timbale 2, tom, snare, and kick. The hi hat plays a steady quarter-note pattern. The tambourine plays eighth-note patterns with accents. The timbales play specific rhythmic patterns, with timbale 2 having rests on beats 2 and 4. The tom plays quarter notes on beats 1 and 3. The snare plays a pattern of eighth notes with accents. The kick plays quarter notes on beats 1 and 3.

Si Supieras

Excerpt as at approx. 1:20

♩ = 92

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Musical score for 'Si Supieras' in 4/4 time. The score includes parts for hi hat, tom, snare 1, and kick. The hi hat plays quarter notes. The tom plays quarter notes on beats 1 and 3. The snare 1 plays a pattern of eighth notes with accents. The kick plays quarter notes on beats 1 and 3.

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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

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

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Fish Market

Steely & Clevie

Musical score for the drum set of "Fish Market" by Steely & Clevie. The score is in 2/4 time and consists of two measures. The instruments and their parts are: hi hat (quarter notes), tambourine (eighths), timbale 1 (eighths), timbale 2 (quarter notes), tom (quarter notes), snare (eighths), and kick (quarter notes). The bass line is in 2/4 time with a key signature of one flat.

Sigueme y Te Sigo

Excerpt as at approx. 3:37

Musical score for the drum set of "Sigueme y Te Sigo" excerpt. The score is in 4/4 time with a tempo of 100. The instruments and their parts are: hi hat (quarter notes), tom (quarter notes), timbale (eighths), snare (eighths), and kick (quarter notes). The bass line is in 4/4 time with a key signature of two sharps.

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

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Fish Market

Steely & Clevie

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Musical score for 'Fish Market' in 4/4 time. The score includes parts for hi hat, tambourine, timbale 1, timbale 2, tom, snare, kick, and bass. The hi hat and kick play a steady quarter-note pattern. The tambourine and timbales provide complex rhythmic patterns with accents and grace notes. The tom plays a pattern of quarter notes with rests. The snare plays a pattern of eighth notes with accents. The bass line is in the bass clef, featuring a mix of quarter and eighth notes.

Zum Zum

Excerpt as at approx.0:44

♩ = 92

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Musical score for 'Zum Zum' in 4/4 time, marked with a tempo of 92. The score includes parts for hi hat, timbale, high perc., snare 2, snare 1, Bass Drum, Kick Drum, and bass. The hi hat and kick play a steady quarter-note pattern. The timbale plays a pattern of quarter notes with rests. The high percussion plays a pattern of eighth notes with accents. The snare 2 plays a pattern of eighth notes with accents. The snare 1 plays a pattern of eighth notes with accents. The Bass Drum plays a pattern of quarter notes with rests. The bass line is in the bass clef, featuring a mix of quarter and eighth notes.

1 **Abraham Mateo Allegations**

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

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

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

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

19 **Alex Sensation Allegations**

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

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

1 **Anuel AA Allegations**

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

11 310. Each of *3 Some, Amanece, Armaos 100PRE Andamos, Así Soy Yo, Ayer,*
12 *Ayer 2, Bandido, Bandolera, Ceniza En Cenicero, China, Cristiniando, Demonia, El*
13 *Manual, El Problema, Ella Quiere Beber, Espina, Fútbol y Rumba, Hasta Que Dios*
14 *Diga, Hipócrita, Jangueo, Keii, La Bella Y La Bestia, Nacimos Pa Morir,*
15 *Naturaleza, No Love, Pensando En Tí, Que Se Joda, Reggaetoner, Secreto, Sola*
16 *Remix, Sola, Street Poem, Súbelo, Te Necesito, and Tocándote* (collectively, the
17 “Anuel AA Works”) were separately released at different times subsequent to the
18 1989 release of *Fish Market*.

19 311. Specifically, *Amanece* incorporates a sample taken directly from
20 *Pounder* and, by extension, *Fish Market*. The sample is introduced at approximately
21 0:36 and is looped at various other intervals throughout *Amanece*. The 2 bars sample
22 originated from *Pounder*. However, the fundamental pattern in *Fish Market* is
23 maintained and remains dominant throughout *Amanece*. Additionally, the drum
24 tracks in *Amanece* feature the same kick drum and hi-hat patterns to those in *Fish*
25 *Market* with each playing four crotchets per bar beginning on the first beat of each
26 bar. The snare drum pattern in *Amanece* is the same as *Fish Market*. The synth tom in
27 *Amanece* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on
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1 beats 1 and 3 of every bar. Further, *Amanece* copies *Fish Market*'s bass pattern which
2 anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Amanece* is
3 the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

4 312. Specifically, *Así Soy Yo* features a truncated sample taken directly from
5 *Pounder* and, by extension, *Fish Market*. The sample is played at approximately
6 1:06-1:16. However, the fundamental pattern in *Fish Market* is maintained and
7 remains dominant throughout *Así Soy Yo*. Additionally, the Bb or B flat key in *Así*
8 *Soy Yo* is the same as *Fish Market* and *Pounder*. The bass line played in *Así Soy Yo* is
9 a minimalistic pattern as found in *Fish Market* having emphasis placed on beats 1 and
10 3 of each bar anchoring on a B flat note. The timbre of the bass in *Así Soy Yo* is the
11 same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

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

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

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

24 316. Specifically, *Demonia* incorporates a sample taken directly from
25 *Pounder* and, by extension, *Fish Market*. The sample is introduced at approximately
26 0:23 and is looped at various other intervals throughout *Demonia*. The 2 bars sample
27 originated from *Pounder*. However, the fundamental pattern in *Fish Market* is
28

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

10 317. Specifically, *Keii* incorporates a sample taken directly from *Pounder*
11 and, by extension, *Fish Market*. The sample is played at approximately 0:46-1:07,
12 1:29-1:51, 2:02-2:13 and 2:56-3:18. The 2 bars sample originated from *Pounder*.
13 However, the fundamental pattern in *Fish Market* is maintained and remains
14 dominant throughout *Keii*. Additionally, the drum tracks in *Keii* feature the same kick
15 drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per
16 bar beginning on the first beat of each bar. The snare drum pattern in *Keii* is the same
17 as *Fish Market*. The synth tom in *Keii* copies the pattern of the synth tom in *Fish*
18 *Market* and *Pounder* played on beats 1 and 3 of every bar. The timbale pattern in *Keii*
19 is the same as *Fish Market*. Further, *Keii* copies *Fish Market*'s bass pattern which
20 anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Keii* has the
21 same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

22 318. Specifically, *Nacimos Pa Morir* incorporates a sample taken directly
23 from *Pounder* and, by extension, *Fish Market*. The sample is played at approximately
24 0:42-1:02, 1:14-1:34, 2:18-2:59 and 3:22-3:42. The 2 bars sample originated from
25 *Pounder*. Additionally, the drum tracks in *Nacimos Pa Morir* feature the same kick
26 drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per
27 bar beginning on the first beat of each bar. The snare drum pattern in *Nacimos Pa*
28

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

7 319. Specifically, *No Love* incorporates a sample taken directly from *Pounder*
8 and, by extension, *Fish Market*. The sample is played at approximately 0:27-0:37,
9 0:38-2:39, 2:51-2:59, 3:13-3:21 and 3:24-4:07. The 2 bars sample originated from
10 *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and
11 remains dominant throughout *No Love*. Additionally, the drum tracks in *No Love*
12 feature the same kick drum and hi-hat patterns to those in *Fish Market* with each
13 playing four crotchets per bar beginning on the first beat of each bar. The snare drum
14 pattern in *No Love* is the same as *Fish Market*. The synth tom in *No Love* copies the
15 pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every
16 bar. *No Love* contains the same timbale pattern as *Fish Market*. Further, *No Love*
17 copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and
18 3. The timbre of the bass in *No Love* has the same sub frequency sound spectrum
19 range as in *Fish Market* and *Pounder*.

20 320. Specifically, *Nunca Amare* incorporates elements of the *Fish Market*
21 pattern beginning at approximately 0:35-0:56, 1:00-1:19, 1:30-1:51 and 2:13-2:57.
22 Additionally, the drum tracks in *Nunca Amare* feature the same kick drum and hi-hat
23 patterns to those in *Fish Market* with each playing four crotchets per bar beginning
24 on the first beat of each bar. The snare drum pattern in *Nunca Amare* copies the
25 fundamental snare drum pattern in *Fish Market*. The synth tom in *Nunca Amare*
26 copies the pattern of the synth tom in *Fish Market* played on beats 1 and 3 of every
27 bar. *Nunca Amare* contains a drum loop that mimics the timbale roll played in *Fish*
28

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

4 321. Specifically, *Reggaetoner*a incorporates a sample taken directly from
5 *Pounder* and, by extension, *Fish Market*. The sample is introduced at approximately
6 0:31 and is looped at various other intervals throughout *Reggaetoner*a. The 2 bars
7 sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is
8 maintained and remains dominant throughout *Reggaetoner*a. Additionally, the drum
9 tracks in *Reggaetoner*a feature the same kick drum and hi-hat patterns to those in
10 *Fish Market* with each playing four crotchets per bar beginning on the first beat of
11 each bar. The snare drum pattern in *Reggaetoner*a is the same as *Fish Market*. The
12 synth tom in *Reggaetoner*a copies the pattern of the synth tom in *Fish Market* and
13 *Pounder* played on beats 1 and 3 of every bar. The timbale pattern in *Reggaetoner*a
14 copies the timbale pattern from *Pounder* and *Fish Market*. Further, *Reggaetoner*a
15 copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and
16 3. The timbre of the bass in *Reggaetoner*a has the same sub frequency sound
17 spectrum range as in *Fish Market* and *Pounder*.

18 322. Specifically, *Tentandome* incorporates a sample taken directly from
19 *Pounder* and, by extension, *Fish Market*. The sample is introduced at approximately
20 0:32 and is looped at various other intervals throughout *Tentandome*. The 2 bars
21 sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is
22 maintained and remains dominant throughout *Tentandome*. Additionally, the drum
23 tracks in *Tentandome* feature the same kick drum and hi-hat patterns to those in *Fish*
24 *Market* with each playing four crotchets per bar beginning on the first beat of each
25 bar. The snare drum pattern in *Tentandome* is the same as *Fish Market*. The synth
26 tom in *Tentandome* copies the pattern of the synth tom in *Fish Market* and *Pounder*
27 played on beats 1 and 3 of every bar. *Tentandome* copies the timbale pattern from
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1 *Pounder* and *Fish Market*. Further, *Tentandome* copies *Fish Market*'s bass pattern
2 which anchors the root of the chords on beats 1 and 3. The timbre of the bass in
3 *Tentandome* has the same sub frequency sound spectrum range as in *Fish Market* and
4 *Pounder*.

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

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

13 **Anuel AA & Ozuna Allegations**

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

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

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

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

3 **Bad Bunny Allegations**

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

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

22 331. Specifically, *A Tu Merced* copies elements of the *Fish Market* drum and
23 bass patterns throughout most of the work. The drum tracks in *A Tu Merced* feature
24 the same kick drum and hi-hat patterns to those in *Fish Market* with each playing
25 four crotchets per bar beginning on the first beat of each bar. The snare drum pattern
26 in *A Tu Merced* copies elements of the snare drum pattern played in *Fish Market*, but
27 leaves out certain elements that it instead copies using maracas rather than a snare
28

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

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

17 333. Specifically, *Cuando Perriabas* copies elements of the *Fish Market*
18 drum and bass patterns throughout most of the work. Further, a truncated audio
19 sample taken from *Pounder* can be heard at 1:34 and opens up to the full sample at
20 1:39-1:45 and again at 2:44 through the end of the work. The sample has been temp
21 manipulated, being slowed down from approximately 100 BPM in *Pounder/Fish*
22 *Market* to approximately 82 BPM in *Cuando Perriabas*. The sample remains clearly
23 identifiable. Further, the bass line played in *Cuando Perriabas*, is a minimalistic
24 pattern as performed in *Fish Market* and gives emphasis on beats one and three while
25 utilizing the same smooth sub frequency timbre.

26 334. Specifically, *La Dificil* copies the *Fish Market* drum and bass patterns
27 throughout most of the work and can be heard beginning at approximately 0:45-0:55,
28

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

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

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1 336. Specifically, *Efecto* copies the *Fish Market* drum and bass patterns
2 throughout most of the work. The copied pattern can be heard at approximately 0:19-
3 0:37, 0:39-1:26 and intermittently throughout the rest of the song. Both tempos are
4 the same with a miniscule difference between both works. *Efecto* is approximately 98
5 BPM as opposed to *Fish Market* at approximately 100 BPM. This 2 BPM difference
6 does not impact or change the rhythmic similarities. The drum tracks in *Efecto*
7 feature the same kick drum and hi-hat patterns to those in *Fish Market* with each
8 playing four crotchets per bar beginning on the first beat of each bar. The combined
9 snare drum patterns copy the snare drum pattern played in *Fish Market*, featuring a
10 third 16th note in each bar as played in the *Fish Market* snare pattern. This is more
11 clearly defined at 2:17-2:22, where the additional snare beat can be heard, thus
12 completing the *Fish Market* snare drum pattern. (See red arrows pointers on notation
13 indicating location of additional snare beat). Further, the bass line played in *Efecto*, is
14 a minimalistic pattern as performed in *Fish Market* and gives emphasis on beats one
15 and three while utilizing the same smooth sub frequency timbre.

Fish Market

Steely & Clevie

The image shows a musical score for the 'Fish Market' drum and bass tracks. It consists of seven staves: hi hat, tambourine, timbale 1, timbale 2, tom, snare, and kick. The music is in 4/4 time. The hi hat, snare, and kick patterns are consistent with the text description. The snare pattern includes a third 16th note in each bar. The bass line is minimalistic, emphasizing beats one and three.

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Efecto

Excerpt 2:17 - 2:22

♩ = 98

The musical score is for a 4/4 time piece. It features five drum parts and one bass part. The hi hat part consists of a steady quarter-note pattern. The snare 2 part has a pattern of eighth notes on beats 1 and 3, with rests on beats 2 and 4. The snare 1 part has a similar pattern but with a more complex rhythmic structure, including eighth notes and rests. The kick part plays a steady quarter-note pattern. The bass part is a minimalistic line of eighth notes on beats 1 and 3, with rests on beats 2 and 4. Red arrows point to the first eighth note on beat 1 of the snare 1 part in both measures.

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

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

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

16 **Fish Market**

17 Steely & Clevie

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The image shows musical notation for the 'Fish Market' track by Steely & Clevie. It consists of seven staves for percussion and one for bass. The percussion parts are: hi hat (quarter notes), tambourine (eighths), timbale 1 (eighths), timbale 2 (quarter notes), tom (quarter notes), snare (eighths), and kick (quarter notes). The bass line is in the bottom staff, showing a simple pattern of quarter notes. The notation is in 4/4 time and includes various rhythmic symbols like beams, flags, and rests.

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Me Porto Bonito

Excerpt as at approx. 2:59

The musical score is for the song "Me Porto Bonito" and is an excerpt from approximately 2:59. It features five drum parts and one bass part. The tempo is marked as quarter note = 92. The key signature has three sharps (F#, C#, G#) and the time signature is 4/4. The drum parts are: hi hat (quarter notes), cabassa (quarter notes with rests), snare I (quarter notes with rests, with red arrows pointing to the first and third notes of each bar), and kick (quarter notes). The bass part is a minimalist pattern of quarter notes on beats one and three.

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

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Musical score for 'Fish Market' in 4/4 time. The score includes parts for hi hat, tambourine, timbale 1, timbale 2, tom, snare, and kick. The hi hat and kick play a steady quarter-note pattern. The tambourine and timbales provide a complex rhythmic accompaniment with various patterns of eighth and sixteenth notes. The tom plays a pattern of quarter notes with rests. The snare plays a pattern of eighth notes with rests. The bass line is in the key of B-flat major and consists of a simple quarter-note pattern.

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Moscow Mule

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Musical score for 'Moscow Mule' in 4/4 time. The score includes parts for hi hat, snare 2, snare 1, and kick. A tempo marking of ♩ = 100 is present. The hi hat and kick play a steady quarter-note pattern. The snare 2 plays a pattern of eighth notes with rests. The snare 1 plays a pattern of eighth notes with rests. The bass line is in the key of B-flat major and consists of a simple quarter-note pattern.

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

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Fish Market

Steely & Clevie

The image shows a musical score for the song "Fish Market" by Steely & Clevie. It features seven staves for percussion and one for bass. The percussion parts are: hi hat, tambourine, timbale 1, timbale 2, tom, snare, and kick. The bass part is in the bass clef. The score is divided into two measures by a vertical bar line. The hi hat, snare, and kick parts consist of quarter notes. The tambourine and timbale 1 parts consist of eighth notes. The tom part consists of quarter notes on beats 1 and 3. The bass part consists of quarter notes on beats 1 and 3.

Party

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Excerpt 1:19 - 1:24

$\text{♩} = 97$

The musical score for 'Party' is presented in a standard notation format. It features five drum tracks and one bass track. The tempo is marked as 97 beats per minute. The time signature is 4/4. The hi hat, snare 2, and kick tracks each play a simple, consistent pattern of four eighth notes per bar. The snare 1 track plays a more complex pattern, including eighth and sixteenth notes. The bass track is minimalistic, playing on beats one and three.

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*.

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

19 343. Specifically, *Solo De Mi* copies elements of the *Fish Market* drum and
20 bass patterns throughout most of the work. The *Fish Market* pattern is interspersed
21 through the work manipulated in the mix with breaks and edits. This track features
22 less instruments when compared to *Fish Market*. However, the fundamental pattern
23 in *Fish Market* is predominant throughout the work. The drum tracks in *Solo De Mi*
24 feature the same kick drum and hi-hat patterns to those in *Fish Market* with each
25 playing four crotchets per bar beginning on the first beat of each bar. The snare drum
26 pattern in *Solo De Mi* copies the snare drum pattern in *Fish Market*. Further, the bass
27 line played in *Solo De Mi* is a minimalistic pattern as performed in *Fish Market*
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1 having emphasis placed on beats 1 and 3 while utilizing the same smooth sub
2 frequency timbre.

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

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Fish Market

Steely & Clevie

The musical score for 'Fish Market' by Steely & Clevie is presented in 2/4 time. It features seven staves: hi hat, tambourine, timbale 1, timbale 2, tom, snare, and kick. The hi hat, snare, and kick parts consist of a steady quarter-note pattern. The tambourine and timbale 1 parts feature eighth-note patterns with accents. The tom part has a pattern of quarter notes on beats 1 and 3. The bass line is shown on a separate staff at the bottom, consisting of a simple quarter-note pattern on beats 1 and 3.

Un Ratito

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Excerpt 0:13 - 0:18

♩ = 93

The musical score is for a 4/4 time signature piece. It features four drum parts and one bass line. The hi-hat part consists of four quarter notes per bar. The snare 2 part has a pattern of quarter notes on beats 2 and 4 with eighth notes on the offbeats. The snare 1 part has a similar pattern but with eighth notes on the offbeats. The kick part has quarter notes on beats 1 and 3. The bass line is in the key of B-flat major and has a pattern of quarter notes on beats 1 and 3.

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

1 throughout the work manipulated in the mix with breaks and edits. However, the
2 fundamental pattern in *Fish Market* is predominant throughout the work. The drum
3 tracks in *Yonaguni* features the same kick drum and hi-hat patterns to those in *Fish*
4 *Market* with each playing four crotchets per bar beginning on the first beat of each
5 bar. The snare drum pattern in *Yonaguni* copies the snare drum pattern in *Fish*
6 *Market*. However, the pattern is augmented with a kick drum playing the same snare
7 pattern. Further, the bass line played in *Yonaguni* is a minimalistic pattern. Half of
8 the work features the same bass pattern to *Fish Market* with emphasis placed on beats
9 1 and 3. The other bass pattern puts emphasis on a combination of the snare and kick
10 patterns. The same sub frequency timbre is used on the bass as with *Fish Market*

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

23 348. Specifically, *La Santa* copies elements of the *Fish Market* drum and bass
24 patterns throughout most of the work. The *Fish Market* pattern is interspersed
25 throughout the work manipulated in the mix with breaks and edits. However, the
26 fundamental pattern in *Fish Market* is predominant throughout the work. The drum
27 tracks in *La Santa* feature the same kick drum and hi-hat patterns to those in *Fish*
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1 *Market* with each playing four crotchets per bar beginning on the first beat of each
2 bar. The snare drum pattern in *La Santa* copies the snare drum pattern in *Fish*
3 *Market*.

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

18 350. Specifically, *CÓMO SE SIENTE (Remix)* copies elements of the *Fish*
19 *Market* drum and bass patterns throughout most of the work manipulated in the mix
20 with occasional beat pauses and frequency filtering. However, the fundamental
21 pattern in *Fish Market* is maintained throughout. The track incorporates a variety of
22 drum loops developed from *Fish Market* and *Pounder*. The drum tracks in *CÓMO SE*
23 *SIENTE (Remix)* feature the same kick drum and hi-hat patterns to those in *Fish*
24 *Market* with each playing four crotchets per bar beginning on the first beat of each
25 bar. The snare drum pattern in *CÓMO SE SIENTE (Remix)* copies the pattern played
26 in *Fish Market*. Further, the bass line played in *CÓMO SE SIENTE (Remix)* is a
27 minimalistic pattern as found in *Fish Market*. The bass pattern maintains the same
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1 rhythmic pattern with emphasis placed on beats 1 and 3 of each bar. *CÓMO SE*
2 *SIENTE (Remix)* has the same sub frequency timbre as used for the bass as in *Fish*
3 *Market*.

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

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

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

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

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

25 356. Specifically, *Ignorantes* copies elements of the *Fish Market* drum and
26 bass patterns throughout the work. The drum tracks in *Ignorantes* feature the same
27 kick drum and hi-hat patterns to those in *Fish Market* with each playing four
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1 crotchets per bar beginning on the first beat of each bar. The snare drum pattern in
2 *Fish Market* appears in *Ignorante* but appears as rim shots instead of a snare drum.
3 copies the pattern played in *Fish Market*. Further, the bass line played in *Ignorantes*
4 follows the patterns of the snare in *Fish Market*. The same sub frequency timbre is
5 used on the bass as with *Fish Market*.

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

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

23 359. Specifically, *MAS DE UNA CITA* copies elements of the *Fish Market*
24 drum and bass patterns throughout the work. The drum tracks in *MAS DE UNA CITA*
25 feature the same kick drum and hi-hat patterns to those in *Fish Market* with each
26 playing four crotchets per bar beginning on the first beat of each bar. The snare drum
27 pattern in *MAS DE UNA CITA* copies the pattern played in *Fish Market*. The synth
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1 tom in *MAS DE UNA CITA* copies the pattern of the synth tom in *Pounder* and *Fish*
2 *Market* played on beats 1 and 3 of every bar. Further, the bass line played in *MAS DE*
3 *UNA CITA* places rhythmic emphasis on beats 1 and 3 of each bar as in *Fish Market*.
4 The bass line also maintains a sub frequency timbre in the same way it appears in
5 *Fish Market*.

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

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

23 362. Specifically, *Mia* copies elements of the *Fish Market* drum and bass
24 patterns throughout the work. The *Fish Market* pattern is interspersed throughout the
25 work manipulated in the mix with breaks, edits, drum sounds or stems/loops.
26 However, the fundamental *Fish Market* pattern is maintained and is predominant
27 throughout the work. The drum tracks in *Mia* feature the same kick drum and hi-hat
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1 patterns to those in *Fish Market* with each playing four crotchets per bar beginning
2 on the first beat of each bar. The snare drum pattern in *Mia* copies the pattern played
3 in *Fish Market* and is also used as a substitute for the timbale rolls heard at the end of
4 every second bar in *Fish Market*. This can be heard as 2:18-2:23 and at other
5 locations throughout the work. The synth tom in *Mia* copies the pattern of the synth
6 tom in *Pounder* and *Fish Market* played on beats 1 and 3 of every bar. Further, the
7 bass line played in *Mia* is a minimalistic pattern as performed in *Fish Market*. It
8 maintains a similar pattern with emphasis placed on beats 1 and 3 of each bar. A
9 similar sub frequency timbre is used for the bass in the same manner as in *Fish*
10 *Market*.

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

24 364. Specifically, *Soliá* copies elements of the *Fish Market* drum pattern
25 beginning at approximately 0:31 and is introduced at various other intervals
26 throughout the work. The fundamental pattern in *Fish Market* is maintained and
27 remains predominant throughout the work. The drum tracks in *Soliá* feature the same
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1 kick drum and hi-hat patterns to those in *Fish Market* with each playing four
2 crotchets per bar beginning on the first beat of each bar. The snare drum equivalent in
3 *Soliá* copies the fundamental snare drum pattern played in *Fish Market*. The second
4 bass in *Soliá* that is introduced at approximately 0:31 copies the rhythmic accent of
5 the bass in *Fish Market* on beats 1 and 3 of each bar.

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

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

25 367. Specifically, *Vete* copies elements of the *Fish Market* drum pattern
26 beginning at approximately 0:34 and is introduced at various other intervals
27 throughout the work. The fundamental pattern in *Fish Market* is maintained and
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1 372. Specifically, *Guapa* features a truncated sample of *Pounder* capturing a
2 two-beat segment of the pattern in the recording. This copying appears early in the
3 work at approximately 0:11-0:21 and reintroduced at intervals throughout the work.
4 The use of the stated sample in *Guapa*, by extension, serves to introduce a copying of
5 the fundamental patterns contained in *Fish Market*. The drum tracks in *Guapa* feature
6 the same kick drum and hi-hat patterns to those in *Fish Market* with each playing
7 four crotchets per bar beginning on the first beat of each bar. The snare drum pattern
8 in *Guapa* copies the pattern played in *Fish Market*. The synth tom in *Guapa* copies
9 the pattern of the synth tom in *Pounder* and *Fish Market* played on beats 1 and 3 of
10 every bar. Further, the bass line played in *Guapa* is a minimalistic pattern as
11 performed in *Fish Market*. It maintains a similar pattern with emphasis placed on
12 beats 1 and 3 of each bar. A similar sub frequency timbre is used for the bass in the
13 same manner as in *Fish Market*.

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

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

21 375. Specifically, *Mamiii* incorporates a sample of *Pounder* capturing a two-
22 beat segment of the pattern in the first bar of its 2 bar loop. The sample is played at
23 approximately 1:08-1:17 in *Mamiii* and is introduced at various intervals throughout
24 the work. The use of the *Pounder* sample in *Mamiii* serves to introduce a copying of
25 the patterns contained in *Fish Market*. The drum tracks in *Mamiii* feature the same
26 kick drum and hi-hat patterns to those in *Fish Market* with each playing four
27 crotchets per bar beginning on the first beat of each bar. The snare drum pattern in
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1 *Mamiii* copies the pattern played in *Fish Market*. The synth tom in *Mamiii* copies the
2 pattern of the synth tom in *Pounder* and *Fish Market* played on beats 1 and 3 of every
3 bar. *Mamiii* also copies a segment of the timbales pattern in *Fish Market* and
4 *Pounder*. Further, the timbre of the bass in *Mamiii* is the same sub frequency sound
5 spectrum range as in *Fish Market*.

6 376. Specifically, *La Respuesta* incorporates a sample of *Pounder* capturing a
7 two-beat segment of the pattern in the first bar of its 2 bar loop. A loop of the sample
8 is introduced early in *La Respuesta* at approximately 0:13-0:32, and is re-introduced
9 at intervals throughout the work alternating with other drum loops and breaks.
10 Nevertheless, the fundamental pattern in *Fish Market* is maintained and remains
11 dominant throughout the work. The use of the *Pounder* sample in *La Respuesta*
12 serves to introduce a copying of the patterns contained in *Fish Market*. The drum
13 tracks in *La Respuesta* feature the same kick drum and hi-hat patterns as those in *Fish*
14 *Market* with each playing four crotchets per bar beginning on the first beat of each
15 bar. The snare drum pattern in *La Respuesta* copies the pattern played in *Fish Market*.
16 The synth tom in *La Respuesta* copies the pattern of the synth tom in *Pounder* and
17 *Fish Market* played on beats 1 and 3 of every bar and copies the synth tom sound
18 found in *Pounder*. Further, the bass alternates between the *Fish Market* bass pattern
19 which anchors the root of the chords on beats 1 and 3 found at approximately 1:41-
20 2:02 and a more explorative bassline. The timbre of the bass in *Me Acostumbre* is the
21 same sub frequency sound spectrum range as in *Fish Market*.

22 377. Specifically, *Sin Pijama* incorporates a sample of *Pounder* capturing a
23 segment of the pattern in the recording. The sample begins at approximately 0:58 in
24 *Sin Pijama* and is reintroduced at intervals throughout the work alternating with a
25 drum loop. The use of the *Pounder* sample in *Sin Pijama* serves to introduce a
26 copying of the patterns contained in *Fish Market*. The drum tracks in *Me Acostumbre*
27 feature the same kick drum and hi-hat patterns to those in *Fish Market* with each
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1 playing four crotchets per bar beginning on the first beat of each bar. The snare drum
2 pattern in *Me Acostumbre* copies the pattern played in *Fish Market*. The synth tom in
3 *Me Acostumbre* copies the pattern of the synth tom in *Pounder* and *Fish Market*
4 played on beats 1 and 3 of every bar. *Sin Pijama* also copies a segment of the
5 timbales pattern and sounds synonymous with the timbales in *Fish Market* and
6 *Pounder*. This is placed low in the mix, so it is difficult to determine if the timbales
7 sound is a sample from *Pounder* or *Fish Market* or not. Further, the bass alternates
8 between the *Fish Market* bass pattern which anchors the root of the chords on beats 1
9 and 3 and a more explorative bassline. The timbre of the bass in *Me Acostumbre* is
10 the same sub frequency sound spectrum range as in *Fish Market*.

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

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

26 380. A comparison of *Fish Market* and each of the Becky G Works
27 establishes that each of the Becky G Works incorporates both qualitatively and
28

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

4 **Cali Y El Dandee Allegations**

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

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

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

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

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1 **Camilo Allegations**

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

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

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

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

18 **Carlos Vives Allegations**

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

25 390. Each of *Al Filo de Tu Amor*, *Canción Bonita*, *El Mar de Sus Ojos*, *For*
26 *Sale*, *Hechicera*, *La Bicicleta*, *La Tierra Prometida*, *Los Consejos del Difunto*,
27 *Monsieur Bigoté*, *No Te Vayas*, *Nuestro Secreto*, *Pescaíto*, *Robarte Un Beso*, *Si Me*
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1 *Das Tu Amor, Todo Me Gusta, and Vitamina En Rama* (collectively, the “Carlos
2 Vives Works”) were separately released at different times subsequent to the 1989
3 release of *Fish Market*.

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

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

12 **Casper Magico Allegations**

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

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

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

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1 **Danna Paola Allegations**

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

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

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

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

19 **Danny Ocean Allegations**

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

25 410. Each of *ADO*, *Apartamento*, *Baby I Won't*, *Báilame*, *Cuando Me Acerco*
26 *A Ti*, *Cuántas veces*, *Dembow*, *Dorito & Coca-Cola*, *Epa Wei*, *Fuera del mercado*,
27 *Istanbul*, *Me Rehúso*, and *Tú no me conoces* (collectively, the “Danny Ocean
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1 Works”) were separately released at different times subsequent to the 1989 release of
2 *Fish Market*.

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

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

11 **De La Ghetto Allegations**

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

22 414. Each of *Acércate*, *Ahí Ahí Ahí*, *Amantes*, *Bienvenido Al Bellakeo*,
23 *Caliente*, *Chica Mala*, *Cogelo Pa' Ti*, *Como Baila*, *Cuando Será*, *Dices*, *Dices*
24 *(Remix)*, *El Que Se Enamora Pierde*, *El Volante*, *Ella es Especial*, *Exitandonos*, *Frío*
25 *Olímpico*, *Loco Por Perrearte*, *Loco Por Perrearte Remix*, *Mami*, *Me Acostumbre*,
26 *Me Parece*, *Mi Fanatica*, *Mi Fanatica (Remix)*, *Mírala*, *No Me Digas Que No*,
27 *Perdida*, *Que Tengo Que Aser*, *Relájate Conmigo*, *Se Te Nota*, *Selfie*, *Sin Perse*, *Sube*
28

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

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

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

12 **Dímelo Flow Allegations**

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

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

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

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

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

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

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

22 436. Specifically, *Callao* incorporates a truncated sample taken directly from
23 *Pounder* and *Fish Market* and is introduced at approximately 1:18 and is looped at
24 various intervals throughout *Callao*. *Callao* copies the second bar of the timbale
25 pattern from *Pounder*. *Callao* copies the fundamental drum pattern in *Fish Market*
26 and is looped throughout most of the work. The 2 bars sample originated from
27 *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and
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1 remains dominant throughout *Callao*. Additionally, the drum tracks in *Callao* feature
2 the same kick drum and hi-hat patterns to those in *Fish Market* with each playing
3 four crotchets per bar beginning on the first beat of each bar. The snare drum pattern
4 in *Callao* is the same snare drum in *Fish Market*. The timbale in *Callao* copies
5 elements of the timbale pattern in *Fish Market* and *Pounder*. The synth tom in *Callao*
6 copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and
7 3 of every bar. Further, *Callao* copies *Fish Market*'s bass pattern which anchors the
8 root of the chords on beats 1 and 3. The timbre of the bass in *Callao* is the same sub
9 frequency sound spectrum range as in *Fish Market* and *Pounder*.

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

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

17 439. Specifically, *Deseo* incorporates a sample taken directly from *Pounder*
18 and *Fish Market*, and is introduced at approximately 0:32-0:42, 0:55-1:04, 1:16-
19 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
20 looped at various intervals throughout *Deseo*. *Deseo* copies the fundamental drum
21 pattern in *Fish Market* and is looped throughout most of the work. The 2 bars sample
22 originated from *Pounder*. However, the fundamental pattern in *Fish Market* is
23 maintained and remains dominant throughout *Deseo*. Additionally, the drum tracks in
24 *Deseo* feature the same kick drum and hi-hat patterns to those in *Fish Market* with
25 each playing four crotchets per bar beginning on the first beat of each bar. The snare
26 drum pattern in *Deseo* is the same snare drum in *Fish Market*. The timbale in *Deseo*
27 copies elements of the timbale pattern in *Fish Market* and *Pounder*. The synth tom in
28

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

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

19 441. Specifically, *La Luz* incorporates a sample taken directly from *Pounder*
20 and *Fish Market*, and is introduced at approximately 1:15-1:33, 1:45-1:53, 2:04-2:12,
21 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
22 various intervals throughout *La Luz*. *La Luz* copies the fundamental drum pattern in
23 *Fish Market* and is looped throughout most of the work. The 2 bars sample originated
24 from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and
25 remains dominant throughout *La Luz*. Additionally, the drum tracks in *La Luz* feature
26 the same kick drum and hi-hat patterns to those in *Fish Market* with each playing
27 four crotchets per bar beginning on the first beat of each bar. The snare drum pattern
28

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

7 442. Specifically, *Reggaetón en lo Oscuro* incorporates a sample taken
8 directly from *Pounder* and *Fish Market*, and is introduced at approximately 0:46-
9 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
10 throughout *Reggaetón en lo Oscuro*. *Reggaetón en lo Oscuro* copies the fundamental
11 drum pattern in *Fish Market* and is looped throughout most of the work. The 2 bars
12 sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is
13 maintained and remains dominant throughout *Reggaetón en lo Oscuro*. Additionally,
14 the drum tracks in *Reggaetón en lo Oscuro* feature the same kick drum and hi-hat
15 patterns to those in *Fish Market* with each playing four crotchets per bar beginning
16 on the first beat of each bar. The snare drum pattern in *Reggaetón en lo Oscuro* is the
17 same snare drum in *Fish Market*. The timbale in *Reggaetón en lo Oscuro* copies the
18 timbale pattern in *Pounder*. The synth tom in *Reggaetón en lo Oscuro* copies the
19 pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every
20 bar. Further, *Reggaetón en lo Oscuro* copies *Fish Market*'s bass pattern which
21 anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Reggaetón*
22 *en lo Oscuro* is the same sub frequency sound spectrum range as in *Fish Market* and
23 *Pounder*.

24 443. Specifically, *Todo Comienza en la Disco* incorporates a sample taken
25 directly from *Pounder* and *Fish Market*, and is introduced at approximately 1:14-
26 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
27 at various intervals throughout *Todo Comienza en la Disco*. *Todo Comienza en la*
28

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

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

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

Feid Allegations

22
23 446. As shown in the accompanying Exhibit A, Feid and a plurality of the
24 defendants, the corresponding defendants for each song named therein, have released
25 the songs entitled *911*, *BORRAXXA*, *CHIMBITA*, *Feliz Cumpleaños Ferxxo*,
26 *FERXXO X ÑEJO*, *Ferxxo 100*, *FRESH KERIAS*, *FRIKI*, *FUMETEO*, *Normal*,

27
28

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

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

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

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

17 **Gente de Zona Allegations**

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

25 451. Each of *Algo Contigo, El Mentiroso, Hazle Completo El Cuento, La*
26 *Gozadera, La Tentación, Lo Que Tú y Yo Vivimos, Loco Loco, Mas Macarena, Me*
27 *Da Lo Mismo, Momento, No te dejo sola, Otra Botella, Poquito a Poco, Que Tú*
28

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

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

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

12 **Greeicy Allegations**

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

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

22 456. Specifically, *A Mí No* incorporates a truncated sample taken directly
23 from *Pounder* and *Fish Market*, and is introduced at approximately 0:28-0:50, 1:01-
24 1:22, 1:34-1:55, 1:56-2:06, 2:07-2:40 and 2:51-3:07. The 2 bars sample originated
25 from *Pounder*.

26 457. Specifically, *Cuando te vi* incorporates a truncated sample taken directly
27 from *Pounder* and *Fish Market*, and is introduced at approximately 1:25-1:37 and
28

1 2:22-2:35. The 2 bars sample originated from *Pounder*. Additionally, *Cuando te vi*
2 uses elements of the fundamental drum pattern in *Fish Market* and is looped
3 throughout most of the work.

4 458. Specifically, *Destino* incorporates a truncated sample taken directly from
5 *Pounder* and *Fish Market*, and is introduced at approximately 0:44-0:53, 1:05-1:14,
6 1:35-1:50, 2:16-2:25, and 2:39-2:46. The 2 bars sample originated from *Pounder*.
7 *Destino* uses elements of the fundamental drum pattern in *Fish Market* and is looped
8 throughout most of the work. Additionally, *Destino* copies *Fish Market*'s bass pattern
9 which anchors the root of the chords on beats 1 and 3 at 0:44-1:24.

10 459. Specifically, *Jacuzzi* incorporates a truncated sample taken directly from
11 *Pounder* and *Fish Market*, and is introduced at approximately 0:36-0:54, 1:38-1:46,
12 1:54-2:03, 2:25-2:34, and 2:43-2:52. The 2 bars sample originated from *Pounder*.
13 *Jacuzzi* uses elements of the fundamental drum pattern in *Fish Market* and is looped
14 throughout most of the work. Additionally, *Jacuzzi* copies *Fish Market*'s bass pattern
15 which anchors the root of the chords on beats 1 and 3. The timbre of the bass in
16 *Jacuzzi* is the same sub frequency sound spectrum range as in *Fish Market*.

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

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

25 **Ivy Queen Allegations**

26 462. As shown in the accompanying Exhibit A, Ivy Queen and a plurality of
27 the defendants, the corresponding defendants for each song named therein, have
28

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

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

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

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

14 **J Balvin Allegations**

15 466. As shown in the accompanying Exhibit A, J Balvin and a plurality of the
16 defendants, the corresponding defendants for each song named therein, have released
17 the songs entitled *6AM*, *Abrázame*, *Abusadora*, *Acércate*, *Agua*, *Ahora*, *Amarillo*,
18 *Ambiente*, *Arcoíris*, *Ay Vamos*, *Azul*, *Bajo La Luna*, *Blanco*, *Bobo*, *Bonita Remix*,
19 *Bonita*, *Como Un Animal*, *Como Yo*, *Con Flow Mátalo*, *Cuando Tú Quieras*, *Cuidao*
20 *Por Ahí*, *Dame mas*, *Déjate Llevar*, *Desnúdate*, *Dónde Estarás*, *Ella me cautivo*, *En*
21 *Lo Oscuro*, *Éxtasis*, *Ginza*, *Gris*, *Hola*, *Hola que tal*, *Imaginándote*, *La Canción*, *La*
22 *Venganza*, *Machika*, *Malvada*, *Mami*, *Me Gustas Tú*, *Mi Corazón*, *Mi Gente*,
23 *Mojaita*, *Morado*, *Negro*, *Nivel De Perreo*, *No Es Justo*, *Noche de pasión*, *Noches*
24 *Pasadas*, *Peligrosa*, *Pierde Los Modales*, *Poblado*, *Por un día*, *Porque Tu*, *Primera*
25 *cita*, *Qué Más Pues?*, *Que Pretendes*, *Reggaeton*, *Rojo*, *Rosa*, *Safari*, *Se Aloca*,
26 *Seguiré Subiendo*, *Sencillo*, *Sigo Extrañándote*, *Sin Compromiso*, *Solitario*, *Ten*
27 *Cuidado (Pokémon 25 Version)*, *Tranquila*, *Tú Tienes Algo*, *Tu Veneno*, *Un Dia (One*
28

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

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

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

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

25 **Jason Derulo Allegations**

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

4 **Jay Wheeler Allegations**

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

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

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

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

22 **Jhay Cortez Allegations**

23 482. As shown in the accompanying Exhibit A, Jhay Cortez and a plurality of
24 the defendants, the corresponding defendants for each song named therein, have
25 released the songs entitled *Apaga Las Luces, Christian Dior, Como Se Siente,*
26 *Cuando Bebe, Dale Como Es, Deséame Suerte, Deseos, Deseos (Remix), Dile*
27 *(Homenaje), Dime A Ve, Donde No Se Vea, Easy (Remix), Easy, Esta Dejá,*
28

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

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

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

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

19 **Justin Quiles Allegations**

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

28

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

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

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

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

26 **Karol G Allegations**

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

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

18 492. Specifically, *ARRANCA PAL CARAJÓ* incorporates a truncated sample
19 taken directly from *Pounder* and, by extension, *Fish Market*, and begins at
20 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
21 3:42-3:54. The 2 bars sample originated from *Pounder*. However, the fundamental
22 pattern in *Fish Market* is maintained and remains dominant throughout *ARRANCA*
23 *PAL CARAJÓ*; with the additional pattern made up of recreated elements of the
24 sampled pattern, which is then repeated throughout *ARRANCA PAL CARAJÓ*
25 alternating with the sample. Additionally, the drum tracks in *ARRANCA PAL*
26 *CARAJÓ* feature the same kick drum and hi-hat patterns to those in *Fish Market* with
27 each playing four crotchets per bar beginning on the first beat of each bar. The snare
28

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

8 493. Specifically, *CONTIGO VOY A MUERTE* incorporates a truncated
9 sample taken directly from *Pounder* and, by extension, *Fish Market*, and begins at
10 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
11 3:02-3:13. The 2 bars sample originated from *Pounder*. However, the fundamental
12 pattern in *Fish Market* is maintained and remains dominant throughout *CONTIGO*
13 *VOY A MUERTE*; with the additional pattern made up of recreated elements of the
14 sampled pattern, which is then repeated throughout *CONTIGO VOY A MUERTE*
15 alternating with the sample. Additionally, the drum tracks in *CONTIGO VOY A*
16 *MUERTE* feature the same kick drum and hi-hat patterns to those in *Fish Market* with
17 each playing four crotchets per bar beginning on the first beat of each bar. The snare
18 drum pattern in *CONTIGO VOY A MUERTE* is the same as *Fish Market* with its
19 inclusion of the 3rd and 11th sixteenth beat in each bar. The synth tom in *CONTIGO*
20 *VOY A MUERTE* copies the pattern of the synth tom in *Pounder* and *Fish Market*
21 played on beats 1 and 3 of every bar. Further, *CONTIGO VOY A MUERTE* copies
22 *Fish Market's* bass pattern which anchors the root of the chords on beats 1 and 3. The
23 timbre of the bass in *CONTIGO VOY A MUERTE* has the same sub frequency sound
24 spectrum range as in *Fish Market* and *Pounder*.

25 494. Specifically, *EL MAKINON* incorporates a truncated sample taken
26 directly from *Pounder* and, by extension, *Fish Market*, and begins at approximately
27 0:36-0:46 and 1:43-1:53. The 2 bars sample originated from *Pounder*. However, the
28

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

13 495. Specifically, *GATÚBELA* incorporates a sample taken directly from
14 *Pounder* and, by extension, *Fish Market*. The sample is played at approximately
15 0:40-0:58 and is introduced at various other intervals throughout *GATÚBELA*. The 2
16 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish*
17 *Market* is maintained and remains dominant throughout *GATÚBELA*; with the
18 additional pattern made up of recreated elements of the sampled pattern, which is
19 then repeated throughout *GATÚBELA* alternating with the sample. *GATÚBELA*
20 features a timbale roll from *Fish Market* at 1:20. Additionally, the drum tracks in
21 *GATÚBELA* feature the same kick drum and hi-hat patterns to those in *Fish Market*
22 with each playing four crotchets per bar beginning on the first beat of each bar. The
23 snare drum pattern in *GATÚBELA* is the same as *Fish Market* with its inclusion of
24 the 3rd and 11th sixteenth beat in each bar. *GATÚBELA* features a copy of the
25 timbale 32nd beat roll at the end of each bar, and at 1:56, as in *Fish Market* and
26 *Pounder*. The synth tom in *GATÚBELA* copies the pattern of the synth tom in
27 *Pounder* and *Fish Market* played on beats 1 and 3 of every bar. Further, *GATÚBELA*
28

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

4 496. Specifically, *LEYENDAS* incorporates a sample taken directly from
5 *Pounder* and *Fish Market*. The sample is played at approximately 0:30, 1:40-2:00,
6 4:36-4:52, and is introduced at various other intervals throughout *LEYENDAS*. The 2
7 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish*
8 *Market* is maintained and remains dominant throughout *LEYENDAS*; with the
9 additional pattern made up of recreated elements of the sampled pattern, which is
10 then repeated throughout *LEYENDAS* alternating with the sample. Additionally, the
11 drum tracks in *LEYENDAS* feature the same kick drum and hi-hat patterns to those in
12 *Fish Market* with each playing four crotchets per bar beginning on the first beat of
13 each bar. The snare drum pattern in *LEYENDAS* is the same as *Fish Market* with its
14 inclusion of the 3rd and 11th sixteenth beat in each bar. *LEYENDAS* includes a
15 timbale 32nd beat roll at the end of each bar that is unique to *Fish Market* and
16 *Pounder* starting at 3:22-4:20 and 4:57-4:52. The synth tom in *LEYENDAS* copies the
17 pattern of the synth tom in *Pounder* and *Fish Market*. Further, *LEYENDAS* copies
18 *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The
19 timbre of the bass in *LEYENDAS* has the same sub frequency sound spectrum range
20 as in *Fish Market* and *Pounder*.

21 497. Specifically, *ODISEA* incorporates a sample taken directly from
22 *Pounder*, and by extension *Fish Market*. The sample is played at approximately 0:55-
23 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
24 originated from *Pounder*. However, the fundamental pattern in *Fish Market* is
25 maintained and remains dominant throughout *ODISEA*; with the additional pattern
26 made up of recreated elements of the sampled pattern, which is then repeated
27 throughout *ODISEA* alternating with the sample. Additionally, the drum tracks in
28

1 *ODISEA* feature the same kick drum and hi-hat patterns to those in *Fish Market* with
2 each playing four crotchets per bar beginning on the first beat of each bar. The snare
3 drum pattern in *ODISEA* is the same as *Fish Market* with its inclusion of the 3rd and
4 11th sixteenth beat in each bar. The timbale pattern in *ODISEA* is the same as *Fish*
5 *Market* and *Pounder*. The synth tom in *ODISEA* copies the pattern of the synth tom
6 in *Pounder* and *Fish Market* played on beats 1 and 3 of every bar. Further, *ODISEA*
7 copies *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and
8 3. The timbre of the bass in *ODISEA* has the same sub frequency sound spectrum
9 range as in *Fish Market* and *Pounder*.

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

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

18 **Lenny Tavarez Allegations**

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

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

26
27
28

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

3 **Major Lazer Allegations**

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

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

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

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

21 **Maluma Allegations**

22 512. As shown in the accompanying Exhibit A, Maluma and a plurality of the
23 defendants, the corresponding defendants for each song named therein, have released
24 the songs entitled *11PM*, *ADMV (Versión Urbana)*, *Agua de Jamaica*, *Ansiedad*,
25 *Bella-K*, *Booty*, *Borro Cassette*, *Chocolate*, *Cielo a un Diablo*, *Climax*, *Condena*,
26 *Copas de Vino*, *Corazón*, *Correr el Riesgo*, *Cositas de la USA*, *Cuenta a Saldo*,
27 *Cuidau*, *Déjale Saber*, *Delincuente*, *Dime Que Te Parece*, *Dispuesto*, *¿Dónde Estás?*,
28

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

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

28

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

16 515. Specifically, *Bella-K* copies elements of the *Fish Market* drum and bass
17 patterns beginning at approximately 0:12. The *Bella-K* drum pattern is taken from the
18 first two beats of a bar from the *Fish Market* pattern and may also contain an audio
19 sample taken from *Pounder* at a similar location of two beats of a bar in the work.
20 This pattern is the primary pattern used throughout the duration of *Bella-K*. The drum
21 tracks in *Bella-K* feature the same kick drum and hi-hat patterns to those in *Fish*
22 *Market* with each playing four crotchets per bar beginning on the first beat of each
23 bar. The snare drum pattern in *Bella-K* is the same as *Fish Market* with its signature
24 inclusion of a 3rd and 11th sixteenth ghost note preceding the 4th and 12th sixteenth
25 snare note in each bar. The synth tom plays on beats 1 and 3 copying the synth tom
26 in *Fish Market* and *Pounder*. *Bella-K* features a copy of the timbale 32nd beat roll at
27 the end of each bar as in *Pounder*. Further, the bass line played in *Bella-K* is
28

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

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

19 517. Specifically, *Booty* incorporates a sample from *Pounder*. The sample is
20 introduced at approximately 0:12 and is mixed in throughout the work. The full 2 bar
21 timbale pattern features a loop of a half of a bar segment taken from the *Pounder*.
22 This constitutes the dominant loop repeated throughout the work. The use of the
23 *Pounder* sample in *Booty* serves to introduce a copying of the patterns contained in
24 *Fish Market*. The drum tracks in *Booty* feature the same kick drum and hi-hat patterns
25 to those in *Fish Market* with each playing four crotchets per bar beginning on the first
26 beat of each bar. The snare drum pattern in *Booty* is the same as *Fish Market*. The
27 synth tom plays on beats 1 and 3 copying the synth tom in *Fish Market* and *Pounder*
28

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

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

20 519. Specifically, *Copas de Vino* incorporates a sample from *Pounder*. The
21 sample is introduced at approximately 0:31 and is mixed in throughout the work. The
22 full 2 bar timbale pattern features a loop of a half of a bar segment taken from the
23 *Pounder*. This constitutes the dominant loop repeated throughout the work. The use
24 of the *Pounder* sample in *Copas de Vino* serves to introduce a copying of the patterns
25 contained in *Fish Market*. The drum tracks in *Copas de Vino* feature the same kick
26 drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per
27 bar beginning on the first beat of each bar. The snare drum pattern in *Copas de Vino*
28

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

9 520. Specifically, *El Perdedor* incorporates a sample from *Pounder*. The
10 sample appears at approximately 0:06-0:17 and is re-introduced at approximately
11 1:18 and is mixed in and out throughout the duration of the work. The full 2 bar
12 timbale pattern features a loop of a half of a bar segment taken from the *Pounder*.
13 This constitutes the dominant loop repeated throughout the work. The use of the
14 *Pounder* sample in *El Perdedor* serves to introduce a copying of the patterns
15 contained in *Fish Market*. The drum tracks in *El Perdedor* feature the same kick
16 drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per
17 bar beginning on the first beat of each bar. The snare drum pattern in *El Perdedor* is
18 the same as *Fish Market*. Further, the bass line played in *El Perdedor* is minimalistic
19 and anchors on the root of the chords on beats one and three as in *Fish Market*. A
20 similar sub frequency timbre is used for the bass in the same manner as in *Fish*
21 *Market*.

22 521. Specifically, *Cositas de la USA* incorporates elements of the *Fish*
23 *Market* drum pattern beginning at approximately 0:40 and may also contain an audio
24 sample taken from *Pounder* featuring the full 2 bars pattern. The drum tracks in
25 *Cositas de la USA* feature the same kick drum and hi-hat patterns to those in *Fish*
26 *Market* with each playing four crotchets per bar beginning on the first beat of each
27 bar. The snare drum pattern in *Cositas de la USA* is the same as *Fish Market* with its
28

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

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

23 523. Specifically, *Felices los 4* incorporates elements of the *Fish Market*
24 drum pattern beginning at approximately 1:17 and is the primary pattern used
25 throuout the duration of the work. The drum tracks in *Felices los 4* feature the same
26 kick drum and hi-hat patterns to those in *Fish Market* with each playing four
27 crotchets per bar beginning on the first beat of each bar. The snare drum pattern in
28

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

7 524. Specifically, *La Flaca* incorporates a sample from *Pounder* at 0:21-0:50,
8 1:02-1:32, 1:45-1:52 and 2:05-2:14. The sample appears intermittently throughout the
9 duration of the work. The full 2 bar pattern is edited to a half of a bar segment taken
10 from *Pounder*. of a half of a bar segment taken from the *Pounder*. This constitutes
11 the dominant loop repeated throughout the work. The use of the *Pounder* sample in
12 *La Flaca* serves to introduce a copying of the patterns contained in *Fish Market*. The
13 drum tracks in *La Flaca* feature the same kick drum and hi-hat patterns to those in
14 *Fish Market* with each playing four crotchets per bar beginning on the first beat of
15 each bar. The snare drum pattern in *La Flaca* is the same as *Fish Market*. The synth
16 tom in *La Flaca* plays on beats 1 and 3 copying the pattern from *Fish Market* and
17 *Pounder*, and the sound of the synth tom in *Pounder*. Further, the bass line played in
18 *La Flaca* is minimalistic and anchors on the root of the chords on beats one and three
19 as in *Fish Market*. A similar sub frequency timbre is used for the bass in *La Flaca* as
20 in *Fish Market*, but is also coupled with a lighter pop infused, mid frequency range
21 boosted bass.

22 525. Specifically, *Madrid* incorporates a sample from *Pounder* at 0:23-0:56,
23 1:09-1:19, 1:23-1:40, 1:54-2:15, 2:27-2:49, and 3:01-3:12. The sample appears
24 intermittently throughout the duration of the work. The full 2 bar pattern is edited to a
25 half of a bar segment taken from *Pounder*. of a half of a bar segment taken from the
26 *Pounder*. This constitutes the dominant loop repeated throughout the work. The use
27 of the *Pounder* sample in *Madrid* serves to introduce a copying of the patterns
28

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

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

26 527. Specifically, *Parce* incorporates elements of the *Fish Market* drum
27 pattern beginning at approximately 0:47. The pattern is introduced throughout the
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1 duration of the work, infused with a truncated version of the *Fish Market* intro drum
2 roll and elements of the pattern with sounds replaced. A conga drum fills in for the
3 timbales in *Fish Market* with the signature 32nd beats roll maintained in the pattern.
4 The *Fish Market* pattern constitutes the dominant loop repeated throughout the work.
5 The drum tracks in *Parce* feature the same kick drum and hi-hat patterns to those in
6 *Fish Market* with each playing four crotchets per bar beginning on the first beat of
7 each bar. The snare drum pattern in *Parce* is the same as *Fish Market* with its
8 inclusion of the pattern's second and sixth 8th note snare beat in each bar. The synth
9 tom plays on beats 1 and 3 copying the pattern of the synth tom in *Fish Market* and
10 *Pounder*, and copies the synth tom sound from *Pounder*. Further, a similar sub
11 frequency timbre is used for the bass in the same manner as in *Fish Market*

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

20 529. Specifically, *Sin Contrato* incorporates a sample from *Pounder* at 1:18-
21 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
22 truncated to a half a bar segment. The truncated element constitutes the dominant
23 loop repeated throughout the work with its signature second bar timbale pattern. The
24 use of the *Pounder* sample in *Sin Contrato* serves to introduce a copying of the
25 patterns contained in *Fish Market*. The drum tracks in *Sin Contrato* feature the same
26 kick drum and hi-hat patterns to those in *Fish Market* with each playing four
27 crotchets per bar beginning on the first beat of each bar. The snare drum pattern in
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1 *Sin Contrato* is the same as *Fish Market*. The synth tom in *Sin Contrato* plays on
2 beats 1 and 3 copying the pattern from *Fish Market* and *Pounder*, and the sound of
3 the synth tom in *Pounder*. Further, a similar sub frequency timbre is used for the bass
4 in *Sin Contrato* as in *Fish Market*

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

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

13 **Manuel Turizo Allegations**

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

22 533. Each of *Ahora Eh*, *Amor En Coma*, *Antes Que Te Vayas*, *Baila*
23 *Connmigo*, *Bailemos*, *Caso Perdido*, *Cosas Malas*, *Esclavo De Tus Besos*,
24 *Esperandote*, *Kayak*, *La Nota*, *Mala Costumbre*, *Nada Ha Cambiado*, *No Digas Que*
25 *Te Vas*, *No Le Pertenesces*, *No Me Conoce*, *Quiéreme Mientras Se Pueda*, *Sola*, *Ser*
26 *un cantante*, *Sábanas Desordenadas*, *Te Falló*, *Te Olvido*, *Te Pido Perdón*, *Te*
27 *Quemaste*, *Tiempo*, *Una Lady Como Tú*, and *Vámonos* (collectively, the “Manuel
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1 Turizo Works”) were separately released at different times subsequent to the 1989
2 release of *Fish Market*.

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

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

11 **Myke Towers Allegations**

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

18 537. Each of *Almas Gemelas, Ande Con Quien Ande, Bailame Así,*
19 *BANDIDO, Cuando Bebe, EXPLICITO, Fantasia Sexual, Funeral, Girl, Hechizo,*
20 *Inocente, Luces de Neon, Mayor, Otro, Pa' La Pared, Parcerita, Piensan, Relación*
21 *Rota, Rutina, Si Se Da Remix, Si Se Da, Tiene Que Saber, and Viral* (collectively, the
22 “Myke Towers Works”) were separately released at different times subsequent to the
23 1989 release of *Fish Market*.

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

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

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

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1 *Hasta Bajo, Hasta El Amanecer, I Can't Forget You, I Love You, I'm Not Your*
2 *Husband / Tu Marido, Interlude (7) Salón de La Fama, Interlude (14) Salón de La*
3 *Fama, Intro (featuring Daddy Yankee, Polaco, Falo) [Haciendo Escante], Intro -*
4 *Salón de La Fama, Jaleo, Juegos Prohibidos, La Combi, La Gata, La Paga, La*
5 *Promesa (La Calle), La Toco, La Vamos a Montar, Loco, Magnum, Mango Piña,*
6 *Maniquí, Me Estoy muriendo, Me voy pal party, My Baby, Mi Estilo Predomino, Mi*
7 *Gente Tiene Que Bailar, Mi Maldición, Miami, Mil Lagrimas, Muchos Pensaron Que*
8 *The Cream Se Acabo, Muévelo, Nadie Como Tú, Ni Sé, No Hay Nadie Más, No Te*
9 *Puedo Olvidar, No Te Vayas, Noche De Acción, Nos Fuimos, Novia Nueva, Panty,*
10 *Pasado, Pelean Por Fama, Perdóname, Piensas En Mi, Pikete, Playa, Polvo, Por El*
11 *Momento, Quedate Con El, Quiero Estar Contigo, Quisieras, Sacando Chispa, Se Dé*
12 *Y Se Da, Se Te Acuerdas La Primera Vez, Si Te Metes Conmigo, Si Tú Guayas, Si Tú*
13 *La Ves, Si Tu No Estas, Si Yo Fuera Tu Hombre, Sigo Potente, Siguen Haciendo*
14 *Ruido [Remix], Sin Filtro, Sin Novia, Suelta, Superhéroe, Te Hace Falta, Te Haces*
15 *La Difícil, Te Invito, Te Quiero Tocar, Te Robaré, Tequila, Tienen El Control, Tienes*
16 *Que Ser Mia, Tócate, Ton Ton Ton, Tragatela, Trankila, Travesuras, Tú, Tu Cuerpo*
17 *En La Cama, Tu Cuerpo Me Ama, Tu Hombre, Tu Primera Vez, Tú y Tu Flow, Tus*
18 *Ojos, Un Sueño, Una Guayaa, Va Pasando el Tiempo, Vamos A Perrear, Ve y Dile*
19 *(No Llores), Vive Contigo, Voy a Beber, Whine Up, Y Las Gatas, Ya No Me Llamas,*
20 *Yo Tengo Algo, Yo No Sé Que Esperas Tú, and Yo No Soy Tu Marido (collectively,*
21 *the “Nicky Jam Works”)* were separately released at different times subsequent to the
22 1989 release of *Fish Market*.

23 549. Specifically, *Te Robaré* incorporates a sample taken directly from
24 *Pounder* and is introduced at approximately 0:33 and is looped at various intervals
25 throughout *Te Robaré*. *Te Robaré* copies the fundamental drum patterns in *Fish*
26 *Market* and is looped throughout most of the work. The 2 bars sample originated
27 from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and
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1 remains dominant throughout *Te Robaré*. Additionally, the drum tracks in *Te Robaré*
2 feature the same kick drum and hi-hat patterns to those in *Fish Market* with each
3 playing four crotchets per bar beginning on the first beat of each bar. The snare drum
4 pattern in *Te Robaré* is the same snare drum in *Fish Market*. The timbale in *Te*
5 *Robaré* copies elements of the timbale pattern in *Fish Market* and *Pounder*. The
6 synth tom in *Te Robaré* copies the pattern of the synth tom in *Fish Market* and
7 *Pounder* played on beats 1 and 3 of every bar. Further, *Te Robaré* copies *Fish*
8 *Market's* bass pattern which anchors the root of the chords on beats 1 and 3. The
9 timbre of the bass in *Te Robaré* is the same sub frequency sound spectrum range as in
10 *Fish Market* and *Pounder*.

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

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

15 552. Specifically, *Se Dé Y Se Da* incorporates a truncated sample taken
16 directly from *Pounder* and *Fish Market*, and is introduced at approximately 0:31 and
17 is looped at various intervals throughout *Se Dé Y Se Da*. *Se Dé Y Se Da* copies the
18 fundamental drum pattern from *Fish Market* and is looped at various other intervals
19 throughout *Se Dé Y Se Da*. The 2 bars sample originated from *Pounder*. However, the
20 fundamental pattern in *Fish Market* is maintained and remains dominant throughout
21 *Se Dé Y Se Da*. Additionally, the drum tracks in *Se Dé Y Se Da* feature the same kick
22 drum and hi-hat patterns to those in *Fish Market* with each playing four crotchets per
23 bar beginning on the first beat of each bar. The snare drum pattern in *Se Dé Y Se Da*
24 is the same snare drum in *Fish Market*. The timbale in *Se Dé Y Se Da* copies elements
25 of the timbale pattern in *Fish Market* and *Pounder*. The synth tom in *Se Dé Y Se Da*
26 copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and
27 3 of every bar. Further, *Se Dé Y Se Da* copies *Fish Market*'s bass pattern which
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1 556. As shown in the accompanying Exhibit A, Ozuna and a plurality of the
2 defendants, the corresponding defendants for each song named therein, have released
3 the songs entitled *A Escondidas*, *Apretaito*, *Aunque Me Porté Mal*, *BAILA BAILA*
4 *BAILA*, *Baila Baila Baila (Remix)*, *Bebe*, *Besos Mojados*, *Cama Vacía*, *Cambio*,
5 *Caramelo*, *Caramelo Remix*, *Coméntale*, *Contigo Lo Tengo Todo*, *CORAZON DE*
6 *SEDA*, *Cumpleaños*, *Danzau*, *DEPRIMIDA*, *Despeinada*, *Devuélveme*, *Dialogue Con*
7 *Mi Corazón*, *Dicen*, *Difícil Olvidar*, *Dile Que Tu Me Quieres*, *Egoísta*, *El desorden*,
8 *El Proceso*, *El Reggaetón*, *En Otro Mundo*, *Enemigos Ocultos*, *Eres Top*, *Escape*,
9 *Este Loko*, *Esto No Acaba*, *Falsa Mentiras*, *Fanática*, *Fantasia*, *Fuego*, *Gistro*
10 *Amarillo*, *Háblale (Remix)*, *Hablale*, *Haciéndolo*, *Hasta Que Salga el Sol*, *Hola*,
11 *Humo y Alcohol*, *Ibiza*, *Igual Como Tú*, *Independiente*, *Infidelidad*, *Juegos De Amor*,
12 *La Modelo*, *Linda Y Asicala*, *Llegó la Navidad*, *Luce Bien*, *Luz Apaga*, *Mai Que*
13 *Locura*, *Mala*, *Me Dijeron*, *Mi Niña*, *Mírame*, *Muito Calor*, *No la Mires*, *No Me*
14 *Heches La Culpa*, *No Quiere Enamorarse*, *No Quiere Enamorarse (Remix)*, *No Se*
15 *Da Cuenta*, *No Se Que Tienes*, *Noches de Aventura*, *One Dance Remix*, *Pégate*, *Que*
16 *Bien Te Ves*, *Qué Tú Esperas*, *Quiero Mas*, *Reggaeton en Paris*, *Se Porta Mal*, *Se*
17 *Preparo*, *Se Suelta Sola*, *Se Toca Todita*, *Si Te Dejas Llevar*, *Si Tu Marido No Te*
18 *Quiere*, *Si Tu Marido No Te Quiere (Remix)*, *Síguelo Bailando*, *Sígueme Los Pasos*,
19 *SIMPLE*, *Sin Ti Estoy Mejor*, *Sincero*, *Supuestamente*, *Te Paso A Buscar*, *Te Soñé De*
20 *Nuevo*, *TIEMPO*, *Tu Foto*, *Tu Olor*, *Un Bellaqueo*, *Una Locura*, *Única*, *Única*
21 *(Remix)*, *Vacía Sin Mí*, *Vaina Loca*, *Ya No Estoy Pa Ti*, and *Yo Tengo Una Gata*.

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

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

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

3 559. Specifically, *Me Dijeron* incorporates a truncated sample of the taken
4 directly from *Pounder* and, by extension, *Fish Market*. The fundamental drum and
5 bass pattern is introduced at approximately 0:40-1:21, 1:31-1:41, 1:49-2:11, and
6 2:53-3:23 and is looped at various other intervals throughout *Me Dijeron*. The 2 bars
7 sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is
8 maintained and remains dominant throughout *Me Dijeron*. Additionally, the drum
9 tracks in *Me Dijeron* feature the same kick drum and hi-hat patterns to those in *Fish*
10 *Market* with each playing four crotchets per bar beginning on the first beat of each
11 bar. The snare drum pattern in *Me Dijeron* is the same as *Fish Market*. The synth tom
12 in *Me Dijeron* copies the pattern of the synth tom in *Fish Market* and *Pounder* played
13 on beats 1 and 3 of every bar. The definitive timbale 32nd beats burst roll on the last
14 8th note at the end of each bar in *Pounder* is copied at 1:21-1:31, 2:12-2:22 and 3:23-
15 3:33. Further, *Me Dijeron* copies *Fish Market*'s bass pattern which anchors the root
16 of the chords on beats 1 and 3. The timbre of the bass in *Me Dijeron* is the same sub
17 frequency sound spectrum range as in *Fish Market* and *Pounder*.

18 560. Specifically, *Mi Niña* copies elements of the *Fish Market* drum pattern
19 throughout the work. The elements can be heard at approximately 0:57-1:29, 2:06-
20 2:27, 2:51-3:01, and 3:14-3:23. Additionally, the drum tracks in *Mi Niña* feature the
21 same kick drum and hi-hat patterns to those in *Fish Market* with each playing four
22 crotchets per bar beginning on the first beat of each bar. The snare drum pattern in *Mi*
23 *Niña* copies the fundamental snare drum in *Fish Market*. The synth tom in *Mi Niña*
24 copies the pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and
25 3 of every bar. Further, *Mi Niña* copies *Fish Market*'s bass pattern which anchors the
26 root of the chords on beats 1 and 3. The timbre of the bass in *Mi Niña* is the same sub
27 frequency sound spectrum range as in *Fish Market* and *Pounder*.

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

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

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

15 564. Specifically, *Quiero Mas* incorporates a sample taken directly from
16 *Pounder*, and is introduced at approximately 1:09-1:28, 1:50-1:59, 2:10-2:28, 3:48-
17 3:57, 4:11-4:30, and 5:02-5:09. *Quiero Mas* copies the fundamental drum pattern
18 from *Fish Market* and is looped at various other intervals throughout *Quiero Mas*.
19 The patterns and 2 bars sample originated from *Pounder*. However, the fundamental
20 pattern in *Fish Market* is maintained and remains dominant throughout *Quiero Mas*.
21 Additionally, the drum tracks in *Quiero Mas* feature the same kick drum and hi-hat
22 patterns to those in *Fish Market* with each playing four crotchets per bar beginning
23 on the first beat of each bar. The snare drum pattern in *Quiero Mas* is the same snare
24 drum in *Fish Market*. The timbale in *Quiero Mas* copies the timbale pattern in *Fish*
25 *Market* and *Pounder*. The synth tom in *Quiero Mas* copies the pattern of the synth
26 tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further,
27 *Quiero Mas* copies *Fish Market*'s bass pattern which anchors the root of the chords
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1 on beats 1 and 3. The timbre of the bass in *Quiero Mas* is the same sub frequency
2 sound spectrum range as in *Fish Market* and *Pounder*.

3 565. Specifically, *Se Porta Mal* incorporates a sample taken directly from
4 *Pounder*, and is introduced at approximately 0:31-0:40, 0:52-1:02, 1:13-1:32,1:44-
5 1:54 and 2:26-2:36. *Se Porta Mal* copies the fundamental drum and bass patterns
6 from *Fish Market* and is looped at various other intervals throughout *Se Porta Mal*.
7 The patterns and 2 bars sample originated from *Pounder*. However, the fundamental
8 pattern in *Fish Market* is maintained and remains dominant throughout *Se Porta Mal*.
9 Additionally, the drum tracks in *Se Porta Mal* feature the same kick drum and hi-hat
10 patterns to those in *Fish Market* with each playing four crotchets per bar beginning
11 on the first beat of each bar. The snare drum pattern in *Se Porta Mal* is the same snare
12 drum in *Fish Market*. The timbale in *Se Porta Mal* is the same timbale pattern in *Fish*
13 *Market* and *Pounder*. The synth tom in *Se Porta Mal* copies the pattern of the synth
14 tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Se*
15 *Porta Mal* copies *Fish Market*'s bass pattern which anchors the root of the chords on
16 beats 1 and 3. The timbre of the bass in *Se Porta Mal* is the same sub frequency
17 sound spectrum range as in *Fish Market* and *Pounder*.

18 566. Specifically, *Se Preparó* incorporates a truncated sample taken directly
19 from *Pounder* and *Fish Market*, and is introduced at approximately 1:02-1:22, 1:36-
20 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
21 intervals throughout *Se Preparó*. The 2 bars sample originated from *Pounder*.
22 However, the fundamental pattern in *Fish Market* is maintained and remains
23 dominant throughout *Se Preparó*. Additionally, the drum tracks in *Se Preparó* feature
24 the same kick drum and hi-hat patterns to those in *Fish Market* with each playing
25 four crotchets per bar beginning on the first beat of each bar. The snare drum pattern
26 in *Se Preparó* is the same snare drum in *Fish Market*. The timbale in *Se Preparó*
27 copies elements of the timbale pattern in *Fish Market* and *Pounder*. The synth tom in
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1 *Se Preparó* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on
2 beats 1 and 3 of every bar. Further, *Se Preparó* copies *Fish Market*'s bass pattern
3 which anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Se*
4 *Preparó* is the same sub frequency sound spectrum range as in *Fish Market* and
5 *Pounder*.

6 567. Specifically, *SIMPLE* incorporates a truncated sample taken directly
7 from *Pounder* and *Fish Market*, and is introduced at approximately 1 0:33-0:43, 0:45-
8 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,
9 and 3:13-3:23 and is looped at various other intervals throughout *SIMPLE*. *SIMPLE*
10 copies the fundamental drum and bass patterns from *Fish Market* and is looped at
11 various other intervals throughout *SIMPLE*. The 2 bars sample originated from
12 *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and
13 remains dominant throughout *SIMPLE*. Additionally, the drum tracks in *SIMPLE*
14 feature the same kick drum and hi-hat patterns to those in *Fish Market* with each
15 playing four crotchets per bar beginning on the first beat of each bar. The snare drum
16 pattern in *SIMPLE* is the same snare drum in *Fish Market*. The timbale in *SIMPLE*
17 copies elements of the timbale pattern in *Fish Market* and *Pounder*. The synth tom in
18 *SIMPLE* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on
19 beats 1 and 3 of every bar. Further, *SIMPLE* copies *Fish Market*'s bass pattern which
20 anchors the root of the chords on beats 1 and 3. The timbre of the bass in *SIMPLE* is
21 the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

22 568. Specifically, *Sincero* incorporates a truncated sample taken directly from
23 *Pounder* and *Fish Market* and is looped at various other intervals throughout *Sincero*.
24 *Sincero* copies the fundamental drum pattern from *Pounder* and is looped at various
25 other intervals throughout *Sincero*. The patterns and 2 bars sample originated from
26 *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and
27 remains dominant throughout *Sincero*. Additionally, the drum tracks in *Sincero*
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1 feature the same kick drum and hi-hat patterns to those in *Fish Market* with each
2 playing four crotchets per bar beginning on the first beat of each bar. The snare drum
3 pattern in *Sincero* is the same snare drum in *Fish Market*. The timbale in *Sincero*
4 copies elements of the timbale pattern in *Fish Market* and *Pounder*. The synth tom in
5 *Sincero* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on
6 beats 1 and 3 of every bar. Further, *Sincero* copies *Fish Market*'s bass pattern which
7 anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Sincero* is
8 the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

9 569. Specifically, *Supuestamente* incorporates a truncated sample taken
10 directly from *Pounder* and *Fish Market*, and is introduced at approximately 0:21-
11 0:32, 0:43-1:04, 1:17-2:12, and 2:23-3:18 and is looped at various other intervals
12 throughout *Supuestamente*. The 2 bars sample originated from *Pounder*. However,
13 the fundamental pattern in *Fish Market* is maintained and remains dominant
14 throughout *Supuestamente*. *Supuestamente* copies the fundamental drum and bass
15 patterns in *Fish Market* and is looped throughout most of the work. Additionally, the
16 drum tracks in *Supuestamente* feature the same kick drum and hi-hat patterns to those
17 in *Fish Market* with each playing four crotchets per bar beginning on the first beat of
18 each bar. The snare drum pattern in *Supuestamente* is the same snare drum in *Fish*
19 *Market*. The timbale in *Supuestamente* copies elements of the timbale pattern in *Fish*
20 *Market* and *Pounder*. The synth tom in *Supuestamente* copies the pattern of the synth
21 tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further,
22 *Supuestamente* copies *Fish Market*'s bass pattern which anchors the root of the
23 chords on beats 1 and 3. The timbre of the bass in *Supuestamente* is the same sub
24 frequency sound spectrum range as in *Fish Market* and *Pounder*.

25 570. Specifically, *Te Soñé De Nuevo* incorporates a truncated sample taken
26 directly from *Pounder* and *Fish Market*, and is introduced at approximately 0:23-
27 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

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1 and is looped at various other intervals throughout *Te Soñé De Nuevo*. The unlisted
2 time gaps feature a pattern variation taken from another Steely and Clevie
3 composition entitled *Young Lover* starting at 0:34-0:45, 0:57-1:07, 1:46-1:56, and
4 3:06-3:18. *Te Soñé De Nuevo* copies the fundamental drum and bass patterns in *Fish*
5 *Market* and is looped throughout most of the work. The 2 bars sample originated
6 from *Pounder*. However, the fundamental pattern in *Fish Market* and *Young Lover* is
7 maintained and remains dominant throughout *Te Soñé De Nuevo*. Additionally, the
8 drum tracks in *Te Soñé De Nuevo* feature the same kick drum and hi-hat patterns to
9 those in *Fish Market* with each playing four crotchets per bar beginning on the first
10 beat of each bar. The snare drum pattern in *Te Soñé De Nuevo* is the same snare drum
11 in *Fish Market*. The timbale in *Te Soñé De Nuevo* copies elements of the timbale
12 pattern in *Fish Market* and *Pounder*. The synth tom in *Te Soñé De Nuevo* copies the
13 pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every
14 bar. Further, *Te Soñé De Nuevo* copies *Fish Market*'s bass pattern which anchors the
15 root of the chords on beats 1 and 3. The timbre of the bass in *Te Soñé De Nuevo* is the
16 same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

17 571. Specifically, *Tu Foto* incorporates a truncated sample taken directly
18 from *Pounder* and *Fish Market*, and is introduced at approximately 1:38-1:48, 2:01-
19 2:10, 2:33-2:43, 2:55-3:05 and 3:27-3:37 and is looped at various other intervals
20 throughout *Tu Foto*. *Tu Foto* copies the fundamental drum and bass patterns in *Fish*
21 *Market* and is looped throughout most of the work. The 2 bars sample originated
22 from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and
23 remains dominant throughout *Tu Foto*. Additionally, the drum tracks in *Tu Foto*
24 feature the same kick drum and hi-hat patterns to those in *Fish Market* with each
25 playing four crotchets per bar beginning on the first beat of each bar. The snare drum
26 pattern in *Tu Foto* is the same snare drum in *Fish Market*. The timbale in *Tu Foto*
27 copies elements of the timbale pattern in *Fish Market* and *Pounder*. The synth tom in
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1 *Tu Foto* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on
2 beats 1 and 3 of every bar. Further, *Tu Foto* copies *Fish Market*'s bass pattern which
3 anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Tu Foto* is
4 the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

5 572. Specifically, *Única* incorporates a truncated sample taken directly from
6 *Pounder* and *Fish Market*, and is introduced at approximately 0:04-0:07, 0:17-0:22,
7 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
8 other intervals throughout *Única*. The unlisted time gaps feature a pattern variation
9 taken from another Steely and Cleve composition entitled *Young Lover* starting at
10 1:21-1:28, 1:51-2:02, 3:33-3:40, and 3:55-4:02. *Única* copies the fundamental drum
11 and bass patterns in *Fish Market* and is looped throughout most of the work. The 2
12 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish*
13 *Market* and *Young Lover* is maintained and remains dominant throughout *Única*.
14 Additionally, the drum tracks in *Única* feature the same kick drum and hi-hat patterns
15 to those in *Fish Market* with each playing four crotchets per bar beginning on the first
16 beat of each bar. The snare drum pattern in *Única* is the same snare drum in *Fish*
17 *Market*. The timbale in *Única* copies elements of the timbale pattern in *Fish Market*
18 and *Pounder*. The synth tom in *Única* copies the pattern of the synth tom in *Fish*
19 *Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Única* copies *Fish*
20 *Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The
21 timbre of the bass in *Única* is the same sub frequency sound spectrum range as in
22 *Fish Market* and *Pounder*.

23 573. Specifically, *Única (Remix)* incorporates a truncated sample taken
24 directly from *Pounder* and *Fish Market*, and is introduced at approximately 0:22-
25 0:42, 0:55-1:16, 1:28-1:49, 2:01-2:21, 2:23-2:33, 2:34-2:44, 2:56-3:17 and is looped
26 at various other intervals throughout *Única (Remix)*. The unlisted time gaps feature a
27 pattern variation taken from another Steely and Cleve composition entitled *Young*
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1 *Lover* starting at 1:21-1:28, 1:51-2:02, 3:33-3:40, and 3:55-4:02. *Única (Remix)*
2 copies the fundamental drum and bass patterns in *Fish Market* and is looped
3 throughout most of the work. The 2 bars sample originated from *Pounder*. However,
4 the fundamental pattern in *Fish Market* and *Young Lover* is maintained and remains
5 dominant throughout *Única (Remix)*. Additionally, the drum tracks in *Única (Remix)*
6 feature the same kick drum and hi-hat patterns to those in *Fish Market* with each
7 playing four crotchets per bar beginning on the first beat of each bar. The snare drum
8 pattern in *Única (Remix)* is the same snare drum in *Fish Market*. The timbale in
9 *Única (Remix)* copies elements of the timbale pattern in *Fish Market* and *Pounder*.
10 The synth tom in *Única (Remix)* copies the pattern of the synth tom in *Fish Market*
11 and *Pounder* played on beats 1 and 3 of every bar. Further, *Única (Remix)* copies
12 *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The
13 timbre of the bass in *Única (Remix)* is the same sub frequency sound spectrum range
14 as in *Fish Market* and *Pounder*.

15 574. Specifically, *Vaina Loca* incorporates a truncated sample taken directly
16 from *Pounder* and *Fish Market*, and is introduced at approximately 1:15-1:35, 1:46-
17 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
18 intervals throughout *Vaina Loca*. The unlisted time gaps feature a pattern variation
19 taken from other Steely and Clevie Dancehall patterns starting at 1:05-1:13, 1:36-
20 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
21 the fundamental drum and bass patterns in *Fish Market* and is looped throughout
22 most of the work. The 2 bars sample originated from *Pounder*. However, the
23 fundamental pattern in *Fish Market* is maintained and remains dominant throughout
24 *Vaina Loca*. Additionally, the drum tracks in *Vaina Loca* feature the same kick drum
25 and hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar
26 beginning on the first beat of each bar. The snare drum pattern in *Vaina Loca* is the
27 same snare drum in *Fish Market*. The timbale in *Vaina Loca* copies elements of the
28

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

6 575. Specifically, *Ya No Estoy Pa Ti* incorporates a truncated sample taken
7 directly from *Pounder* and *Fish Market*, and is looped at various intervals throughout
8 *Ya No Estoy Pa Ti*. *Ya No Estoy Pa Ti* also features elements of the drum pattern
9 taken from the Steely and Cleve Dancehall titled *Punanny* starting at 0:13-0:25. The
10 2 bars sample originated from *Pounder*. However, the fundamental pattern in *Fish*
11 *Market* is maintained and remains dominant throughout *Ya No Estoy Pa Ti*.
12 Additionally, the drum tracks in *Ya No Estoy Pa Ti* feature the same kick drum and
13 hi-hat patterns to those in *Fish Market* with each playing four crotchets per bar
14 beginning on the first beat of each bar. The snare drum pattern in *Ya No Estoy Pa Ti*
15 is the same snare drum in *Fish Market*. The timbale in *Ya No Estoy Pa Ti* copies
16 elements of the timbale pattern in *Fish Market* and *Pounder*. The synth tom in *Ya No*
17 *Estoy Pa Ti* copies the pattern of the synth tom in *Fish Market* and *Pounder* played
18 on beats 1 and 3 of every bar. Further, *Ya No Estoy Pa Ti* copies *Fish Market*'s bass
19 pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass
20 in *Ya No Estoy Pa Ti* is the same sub frequency sound spectrum range as in *Fish*
21 *Market* and *Pounder*.

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

25 577. A comparison of *Fish Market* and each of the Ozuna Works establishes
26 that each of the Ozuna Works incorporates both qualitatively and quantitatively
27 significant sections of the *Fish Market* recording and composition. The various
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1 defendants responsible for each of the identified works and the manner of copying are
2 described in the accompanying Exhibit A.

3 **Paulo Londra Allegations**

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

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

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

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

19 **Pitbull Allegations**

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

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

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

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

13 **Reik Allegations**

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

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

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

26 593. A comparison of *Fish Market* and each of the Reik Works establishes
27 that each of the Reik Works incorporates both qualitatively and quantitatively
28

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

4 **Ricky Martin Allegations**

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

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

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

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

20 **Rosalia Allegations**

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

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

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

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

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

13 **Silvestre Dangond Allegations**

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

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

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

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

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

3 **Sky Allegations**

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

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

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

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

18 **Wisin Allegations**

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

28

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

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

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

25 617. A comparison of *Fish Market* and each of the Wisin Works establishes
26 that each of the Wisin Works incorporates both qualitatively and quantitatively
27 significant sections of the *Fish Market* recording and composition. The various
28

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

3 **Wisín & Yandel Allegations**

4 618. As shown in the accompanying Exhibit A, Wisín & Yandel and a
5 plurality of the defendants, the corresponding defendants for each song named
6 therein, have released the songs entitled *Ahora Es, Algo Pasó, Aullando, Besos*
7 *Mojados, Boricua NY1, Burn It Up, Callao, Cállate, Calle Callejero, Chica*
8 *Bombastic, Como Tú No Hay Nadie, Con Mi Reggae Muero, Dame Algo, De Otra*
9 *Manera, Delirando, Dembow, Desaparecio, Descará, Deseo, Dime Quienes Son, El*
10 *Gitro Amarillo, Electrica, En Busca de Ti, En La Disco Bailoteo, ENCENDIO,*
11 *Espejos Negros, Esta Noche Hay Pelea, Estoy Enamorado, Fuera de Base, Ganas de*
12 *Ti, Gerla, Girla, Guaya, Guáyale El Mahón, Hipnotizame Remix, Hola, La Calle*
13 *Caliente, La Fanática, La Gitana, La Luz, La Misión, La Misión 2, La Quebranta*
14 *Hueso" (featuring El Tío), La Reunión De Los Vaqueros, La Revolución, La Rockera,*
15 *La Sata, La Trova, La Vaquera, Las Cosas Cambiaron, Lento, Llamé Pa' Verte*
16 *(Bailando Sexy), Lloro Mi Corazón, Lluve, Manigueta, Mayor Que Yo part 2,*
17 *Mayor Que Yo, Me Dañas la Mente, Me Quieren Detener, Mirala Bien, Mueve tu*
18 *cuerpo lento, Muévete, Mujeron, Musica Buena, Nadie Como Tu, No Fear 3, No Sé,*
19 *NO SE OLVIDA, Noche De Sexo, Ojalá, Ola, Paleta, Pam Pam, Pasan Los Dias,*
20 *Pegate, Pegao, Peligro, Perfecto, Perréame, Piden Perreo, Pidiendo Calor, Por Qué*
21 *Me Peleas, Prende, Presión, Quiero Hacerte el Amor, Quiero Verte Bailar, Rakata,*
22 *Recuerdo, Reggae Rockeao, Reggaetón en lo Oscuro, Salgo Filoteao, Sandungueo,*
23 *Se Acabó, Se desvelan, Se Viste, Sedúceme, Sensación, Sensual Te Ves, Sigán*
24 *Bailando, Sin El, Sólo Una Noche, Soy De La Calle, Suavecito Despacio, Tabla,*
25 *Tarzan, Te Dije Que Iba a Pasar, Te Hice Mujer, Te Noto Tensa, Te Puso A*
26 *Bellaquiar, Te Siento, TIENE QUE PASAR, Títere, Todas Quieren Ser La Mas*
27 *Bellas, Toma, Toma Perreo, Tortura, Te Dije Que Iba a Pasar, Tu Cuerpo Me*
28

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

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

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

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

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

6 622. Specifically, *Chica Bombastic* incorporates a truncated sample taken
7 directly from *Pounder* and *Fish Market*, and is introduced at approximately 0:32-
8 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
9 various intervals throughout *Chica Bombastic*. *Chica Bombastic* copies the
10 fundamental drum pattern in *Fish Market* and is looped throughout most of the work.
11 The 2 bars sample originated from *Pounder*. However, the fundamental pattern in
12 *Fish Market* is maintained and remains dominant throughout *Chica Bombastic*.
13 Additionally, the drum tracks in *Chica Bombastic* feature the same kick drum and hi-
14 hat patterns to those in *Fish Market* with each playing four crotchets per bar
15 beginning on the first beat of each bar. The snare drum pattern in *Chica Bombastic* is
16 the same snare drum in *Fish Market*. The timbale in *Chica Bombastic* copies
17 elements of the timbale pattern in *Fish Market* and *Pounder*. The synth tom in *Chica*
18 *Bombastic* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on
19 beats 1 and 3 of every bar. Further, *Chica Bombastic* copies *Fish Market*'s bass
20 pattern which anchors the root of the chords on beats 1 and 3. The timbre of the bass
21 in *Chica Bombastic* is the same sub frequency sound spectrum range as in *Fish*
22 *Market* and *Pounder*.

23 623. Specifically, *Dame Algo* incorporates a sample taken directly from
24 *Pounder* and *Fish Market*, and is introduced at approximately 0:58-1:07, 1:08-1:17,
25 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
26 is looped at various intervals throughout *Dame Algo*. *Dame Algo* copies the
27 fundamental drum pattern in *Fish Market* and is looped throughout most of the work.
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1 The 2 bars sample originated from *Pounder*. However, the fundamental pattern in
2 *Fish Market* is maintained and remains dominant throughout *Dame Algo*.
3 Additionally, the drum tracks in *Dame Algo* feature the same kick drum and hi-hat
4 patterns to those in *Fish Market* with each playing four crotchets per bar beginning
5 on the first beat of each bar. The snare drum pattern in *Dame Algo* is the same snare
6 drum in *Fish Market*. The timbale in *Dame Algo* copies the timbale pattern in
7 *Pounder*. The synth tom in *Dame Algo* copies the pattern of the synth tom in *Fish*
8 *Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Dame Algo* copies
9 *Fish Market*'s bass pattern which anchors the root of the chords on beats 1 and 3. The
10 timbre of the bass in *Dame Algo* is the same sub frequency sound spectrum range as
11 in *Fish Market* and *Pounder*.

12 624. Specifically, *Deseo* incorporates a sample taken directly from *Pounder*
13 and *Fish Market*, and is introduced at approximately 0:32-0:42, 0:55-1:04, 1:16-
14 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
15 looped at various intervals throughout *Deseo*. *Deseo* copies the fundamental drum
16 pattern in *Fish Market* and is looped throughout most of the work. The 2 bars sample
17 originated from *Pounder*. However, the fundamental pattern in *Fish Market* is
18 maintained and remains dominant throughout *Deseo*. Additionally, the drum tracks in
19 *Deseo* feature the same kick drum and hi-hat patterns to those in *Fish Market* with
20 each playing four crotchets per bar beginning on the first beat of each bar. The snare
21 drum pattern in *Deseo* is the same snare drum in *Fish Market*. The timbale in *Deseo*
22 copies elements of the timbale pattern in *Fish Market* and *Pounder*. The synth tom in
23 *Deseo* copies the pattern of the synth tom in *Fish Market* and *Pounder* played on
24 beats 1 and 3 of every bar. Further, *Deseo* copies *Fish Market*'s bass pattern which
25 anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Deseo* is the
26 same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

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

15 626. Specifically, *La Luz* incorporates a sample taken directly from *Pounder*
16 and *Fish Market*, and is introduced at approximately 1:15-1:33, 1:45-1:53, 2:04-2:12,
17 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
18 various intervals throughout *La Luz*. *La Luz* copies the fundamental drum pattern in
19 *Fish Market* and is looped throughout most of the work. The 2 bars sample originated
20 from *Pounder*. However, the fundamental pattern in *Fish Market* is maintained and
21 remains dominant throughout *La Luz*. Additionally, the drum tracks in *La Luz* feature
22 the same kick drum and hi-hat patterns to those in *Fish Market* with each playing
23 four crotchets per bar beginning on the first beat of each bar. The snare drum pattern
24 in *La Luz* is the same snare drum in *Fish Market*. The timbale in *La Luz* copies
25 elements of the timbale pattern in *Pounder*. The synth tom in *La Luz* copies the
26 pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every
27 bar. Further, *La Luz* copies *Fish Market*'s bass pattern which anchors the root of the
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1 chords on beats 1 and 3. The timbre of the bass in *La Luz* is the same sub frequency
2 sound spectrum range as in *Fish Market* and *Pounder*.

3 627. Specifically, *Reggaetón en lo Oscuro* incorporates a sample taken
4 directly from *Pounder* and *Fish Market*, and is introduced at approximately 0:46-
5 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
6 throughout *Reggaetón en lo Oscuro*. *Reggaetón en lo Oscuro* copies the fundamental
7 drum pattern in *Fish Market* and is looped throughout most of the work. The 2 bars
8 sample originated from *Pounder*. However, the fundamental pattern in *Fish Market* is
9 maintained and remains dominant throughout *Reggaetón en lo Oscuro*. Additionally,
10 the drum tracks in *Reggaetón en lo Oscuro* feature the same kick drum and hi-hat
11 patterns to those in *Fish Market* with each playing four crotchets per bar beginning
12 on the first beat of each bar. The snare drum pattern in *Reggaetón en lo Oscuro* is the
13 same snare drum in *Fish Market*. The timbale in *Reggaetón en lo Oscuro* copies the
14 timbale pattern in *Pounder*. The synth tom in *Reggaetón en lo Oscuro* copies the
15 pattern of the synth tom in *Fish Market* and *Pounder* played on beats 1 and 3 of every
16 bar. Further, *Reggaetón en lo Oscuro* copies *Fish Market*'s bass pattern which
17 anchors the root of the chords on beats 1 and 3. The timbre of the bass in *Reggaetón*
18 *en lo Oscuro* is the same sub frequency sound spectrum range as in *Fish Market* and
19 *Pounder*.

20 628. Specifically, *Todo Comienza en la Disco* incorporates a sample taken
21 directly from *Pounder* and *Fish Market*, and is introduced at approximately 1:14-
22 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
23 at various intervals throughout *Todo Comienza en la Disco*. *Todo Comienza en la*
24 *Disco* copies the fundamental drum pattern in *Fish Market* and is looped throughout
25 most of the work. The 2 bars sample originated from *Pounder*. However, the
26 fundamental pattern in *Fish Market* is maintained and remains dominant throughout
27 *Todo Comienza en la Disco*. Additionally, the drum tracks in *Todo Comienza en la*
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1 *Disco* feature the same kick drum and hi-hat patterns to those in *Fish Market* with
2 each playing four crotchets per bar beginning on the first beat of each bar. The snare
3 drum pattern in *Todo Comienza en la Disco* is the same snare drum in *Fish Market*.
4 The timbale in *Todo Comienza en la Disco* copies the timbale pattern in *Pounder*.
5 The synth tom in *Todo Comienza en la Disco* copies the pattern of the synth tom in
6 *Fish Market* and *Pounder* played on beats 1 and 3 of every bar. Further, *Todo*
7 *Comienza en la Disco* copies *Fish Market*'s bass pattern which anchors the root of
8 the chords on beats 1 and 3. The timbre of the bass in *Todo Comienza en la Disco* is
9 the same sub frequency sound spectrum range as in *Fish Market* and *Pounder*.

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

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

18 **Wolfine Allegations**

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

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

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

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

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

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

3 **Zion Allegations**

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

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

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

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

24 **Zion & Lennox Allegations**

25 643. As shown in the accompanying Exhibit A, Zion & Lennox and a
26 plurality of the defendants, the corresponding defendants for each song named
27 therein, have released the songs entitled *A Forgotten Spot (Olvidado)*, *Aguántate*,
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1 *Ahora Es Que Es, Ahora te sueltas, Amor Genuino, Aquí Estoy Yo, Bachatealo, Baila*
2 *Connmigo, Baila Para Mí, Bailando Tu Y Yo, Bandida, Boom Boom, Chupop (Remix),*
3 *Chupop “Se Va”, Cierra Los Ojos, Cinturita, Colora, Como Curar, Con Una*
4 *Sonrisa, Dame Todo, Dame Tu Amor, Daña Party, De Inmediato, Demuéstrale a tu*
5 *Hombre, Descontróláte, Destino, Dime Baby, dime cuanto tengo que esperar, Diosa,*
6 *Doncella, Don't Stop, El Cantante, El Tiempo, Ella Me Mintió, Embriágame,*
7 *Embriágame Remix, Enamórate, Enchuletiao, Entendemos, Eres Bonita, es mejor*
8 *olvidarlo, Esa Nena, Estas tentandome, Estoy Esperando, Estrella, Fantasma Remix*
9 *Fuiste Tu, Ganas de Ti, Guaya, Guaya Rompe Cintura, Guayo, Hace Tiempo, Hasta*
10 *Abajo, Hay Algo En Ti, Hipnosis, Hola, Hoy lo Siento, Intro | El Sistema, La Botella,*
11 *La Cita, La Española, La Niña, La Noche Es Larga, La Player (Bandolera), Loco,*
12 *Más o Menos, Me Arrepiento, Me Dirijo A Ella, Me Pones en Tension, Mi Tesoro,*
13 *Mírame, Momentos, Motivando la Yal (Intro), Mujer Satisfecha, Mujeriego, No*
14 *Amarres Fuego, No Dejes Que Se Muera, No Mas, No Me Compares, No Me Llama,*
15 *No Pares, No Pierdas Tiempo, No Sé Cómo Empezar, Nuestro Amor, Otra Vez,*
16 *Pégate, Perdóname, Perla, Pierdo La Cabeza Remix, Pierdo La Cabeza, Prende en*
17 *Fuego, Prepárate, Que Bien Se Siente, Qué Vas A Hacer?, Quieren Acción, Quiero*
18 *Tenerte, Quiero Tocarte, Reggae Reggae, Se Puso Feo, Sentir, Sere Yo, Sistema, Solo*
19 *Tú, Soltera, Te Hago el amor, Te Mueves, Tengo Que Decir, Tienes Que Hacerlo,*
20 *Trayectoria, Tu Cuerpo Quiero, Tu Movimiento Me Excita, Tuyo y Mio, Una Cita,*
21 *Una Nota, Vamos En Serio, Vivimos Facturando, Y Vas Caminando, Yo Soy Tu*
22 *Hombre, Yo Tengo Una Gata, Yo Voy, and Zion y Lennox.*

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

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

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

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

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

6 ***

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

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

26 650. On information and belief, Plaintiffs allege that Defendants, and each of
27 them, have performed, distributed, streamed, sold, and/or otherwise exploited each of
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1 the Infringing Works, and/or authorized third parties to do so, within the three years
2 preceding the filing of this action.

3 651. On information and belief, Plaintiffs allege that Defendants, and each of
4 them, continue to exploit and receive monies from the exploitation of Plaintiff's
5 copyrighted works, as alleged herein. Defendants' wrongful copying and/or
6 exploitation of Plaintiffs' copyrighted material in the United States and/or its
7 territories has also allowed for further infringement abroad. Defendants, and each of
8 their, exploitation of Plaintiffs' work, as detailed herein, constitutes infringement.

9 652. On information and belief, Plaintiffs allege that Defendants, and each of
10 them, have distributed, streamed, performed, uploaded, downloaded, and reproduced
11 the Infringing Works on and through servers and streaming services in the United
12 States and have maintained copies of the Infringing Works on servers in the United
13 States, and have distributed, streamed, and performed the Infringign Works to United
14 States residents and consumers.

15 653. Upon information and belief, Plaintiffs allege that UMG, Sony, and/or
16 Sony Latin, from its offices in New York city and/or Santa Monica, California
17 released, distributed, promoted, broadcast, licensed, and/or exploited for profit the
18 songs and music at issue in this case.

19 654. Upon information and belief, Plaintiffs allege that one of more of the
20 Defendants and their publishing companies received monies in connection with the
21 songs and music at issue in this case from ASCAP and other companies based in
22 California.

23 **First Claim for Relief**

24 *(For Copyright Infringement - Against all Defendants)*

25 655. Plaintiffs repeat, re-allege, and incorporate by reference all preceding
26 paragraphs of this Complaint.

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1 656. Plaintiffs own registered copyrights in and for the compositions and
2 sound recordings for *Fish Market* and *Pounder* and the composition for *Dem Bow*.

3 657. *Fish Market* is an original composition and sound recording.

4 658. Plaintiffs own copyrights in the composition of *Dem Bow* along with
5 Rexton Ralston Gordon.

6 659. *Dem Bow* is an original composition.

7 660. *Pounder* is an original sound recording that incorporates the *Fish Market*
8 composition and for which Plaintiffs have ownership.

9 661. Defendants had access to *Fish Market* because *Fish Market* was widely
10 distributed throughout the world since 1989 on vinyl and CD. Defendants also had
11 access to the *Fish Market* through distribution of *Dem Bow* on vinyl and CD which
12 was a worldwide hit within the global reggae dancehall scene and remains a reggae
13 dancehall classic. *Fish Market* and *Dem Bow* were widely distributed on vinyl and
14 CD, which were the dominant media formats at the time of release, and together sold
15 tens of thousands copies on singles and albums within the global reggae dancehall
16 scene. Both *Fish Market* and *Dem Bow* are also available on streaming platforms,
17 including Spotify, Apple Music, Amazon, Pandora, and YouTube prior to the
18 creation of each of the Infringing Works.

19 662. Defendants, and each of them, also had access via *Ellos Benia* and the
20 *Pounder* which were widely distributed in hard copy and via the aforementioned
21 streaming platforms prior to the creation of each of the Infringing Works.

22 663. Defendants, and each of them had access to *Pounder* via its release in
23 physical format or availability online. And Defendant's, and each of their, access to
24 the *Pounder* is further proven by use of portions of the sound recording for *Pounder*
25 by numerous Defendants.

26 664. The access to *Fish Market* by the Defendants associated with the Daddy
27 Yankee Works is demonstrated in the *Dem Bow* infringing Daddy Yankee songs
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1 *Golpe de Estado* and *Calenton*, which include elements that are substantially similar
2 if not virtually identical to significant portions of *Dem Bow*, including the lyrical
3 portions of *Dem Bow*.

4 665. The access to *Fish Market* by the Defendants associated with the Daddy
5 Yankee Works is also demonstrated in the lyrics of the Daddy Yankee song *Zum*
6 *Zum*, and additional infringing Daddy Yankee songs *Camuflash*, *Desafio*, *La Rompe*
7 *Carros*, *Nada Ha Cambiado*, *Po' Encima*, and *Quiero Decirte*, which are all based on
8 the *Pounder*, and which refer to the underlying rhythmic composition as *Dembow*.

9 666. The access to *Fish Market* by the Defendants associated with the Daddy
10 Yankee Works is also demonstrated in the lyrics of the Daddy Yankee songs *Desafio*,
11 and *El Empuje*, which refer to the underlying rhythmic composition as “Dembow”.

12 667. In addition, Defendants’ “sampling” (direct extraction and reproduction)
13 of *Fish Market* and/or *Pounder* establishes access by way of striking similarity, if not
14 virtual identity, and establishes access.

15 668. Defendants, and each of them, infringed Plaintiffs’ rights in *Fish Market*
16 by sampling the recording *Fish Market* and/or *Pounder* and reproducing such sample
17 in one or all of the Infringing Works without Plaintiffs’ authorization or consent.

18 669. Alternatively, Defendants, and each of them, infringed Plaintiffs’ rights
19 in *Fish Market* by making a direct copy of the composition of *Fish Market* and using
20 that copy in one or all of the Infringing Works without Plaintiffs’ authorization or
21 consent.

22 670. Upon information and belief, Plaintiffs allege that Defendants have
23 infringed Plaintiffs’ rights in the works identified herein by, without limitation, (a)
24 authorizing the reproduction, distribution and sale of records and digital downloads
25 of the Infringing Works through the execution of licenses, and/or actually
26 reproducing, and/or selling and distributing physical or digital or electronic copies of
27 the Infringing Works through various physical and online sources and applications,
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1 including without limitation, through Amazon.com, Walmart, Target and iTunes; (b)
2 streaming and/or publicly performing or authorizing the streaming and/or public
3 performance of the Infringing Works through, without limitation, Spotify, YouTube,
4 and Apple Music; and (c) participating in and furthering the aforementioned
5 infringing acts, and/or sharing in the proceeds therefrom, all through substantial use
6 of *Fish Market* in and as part of the Infringing Songs, packaged in a variety of
7 configurations and digital downloads, mixes and versions, and performed in a variety
8 of ways including, but not limited to, audio and video.

9 671. Plaintiffs are informed and believes and thereon alleges that Sony, Ultra,
10 Energy Music Corp, UMP, BMG, Warner, Peermusic III, Ltd, Pulse Records, Sony
11 Music Publishing, LLC, Maybach Music Group, LLC, Cinq Music Group, LLC Cinq
12 Music Publishing, LLC, Real Hasta la Muerte, LLC, Aura Music, LLC, Hipgnosis
13 Songs Group, LLC, Kemosabe Records, LLC, Concord Music Group, LLC, Vydia,
14 Inc., Solar Music Rights Management Limited, Glad Empire Live, LLC, Hear This
15 Music, LLC, Mad Decent Publishing, LLC, Mad Decent Protocol, LLC, Rich Music
16 Inc., Dimelo Vi LLC, VP Records Corporation, Mr. 305, Inc., Duars Entertainment,
17 Corp., Ingrooves Music Group, Empire Distribution, Inc., OVO Sound, LLC, Flow
18 La Movie, Inc., The Royalty Network, Inc., WK Records, LLC, La Base Music
19 Group, LLC and Kobalt have infringed Plaintiffs' rights in *Fish Market*, *Pounder*,
20 and *Dem Bow* by, without limitation, exploiting it for profit by licensing, or otherwise
21 authorizing third parties to use, reproduce and/or perform the Infringing Works for
22 profit.

23 672. Upon information and belief, Plaintiffs allege that Defendants have
24 infringed Plaintiffs' rights in *Fish Market*, *Pounder*, and *Dem Bow* by copying the
25 compositions and/or sampling the recording thereof in the production of the Infringing
26 Works without Plaintiffs' authorization.

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1 673. Upon information and belief, Plaintiffs allege that Defendants have
2 infringed Plaintiffs' rights in *Fish Market*, *Pounder*, and *Dem Bow* by, without
3 limitation, (a) authorizing the reproduction, distribution and sale of records and
4 digital downloads of the Infringing Works, through the execution of licenses, and/or
5 actually reproducing, and/or selling and distributing physical or digital or electronic
6 copies of the Infringing Works through various physical and online sources and
7 applications, including without limitation, through Amazon.com, Walmart, Target
8 and iTunes; (b) streaming and/or publicly performing or authorizing the streaming
9 and/or public performance of the Infringing Works through, without limitation,
10 Spotify, YouTube, and Apple Music; and (c) participating in and furthering the
11 aforementioned infringing acts, and/or sharing in the proceeds therefrom, all through
12 substantial use of *Fish Market*, *Pounder*, and *Dem Bow* in and as part of the
13 Infringing Works, packaged in a variety of configurations and digital downloads,
14 mixes and versions, and performed in a variety of ways including, but not limited to,
15 audio and video.

16 674. Defendants, and each of them, have engaged and continue to engage in
17 the unauthorized reproduction, distribution, public performance, licensing, display,
18 and creation of the Infringing Works. The foregoing acts infringe Plaintiffs' rights
19 under the Copyright Act. Such exploitation includes, without limitation, Defendants',
20 and each of them, distributing and broadcasting the Infringing Works on streaming
21 platforms, including Spotify, Apple Music, Amazon, Pandora, and YouTube.

22 675. Due to Defendants', and each of their, acts of infringement, Plaintiffs'
23 have suffered actual, general, and special damages in an amount to be established at
24 trial, including but not limited to lost license fees and other economic opportunities
25 related to *Fish Market*, *Dem Bow* and/or *Pounder*.

26 676. Due to Defendants' acts of copyright infringement as alleged herein,
27 Defendants, and each of them, have obtained direct and indirect profits they would
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1 not otherwise have realized but for their infringement of Plaintiffs' rights in
2 Plaintiffs' copyrighted compositions and sound recordings. As such, Plaintiffs are
3 entitled to disgorgement of Defendants' profits directly and indirectly attributable to
4 Defendants' infringements of their rights in the compositions and sound recordings in
5 an amount to be established at trial.

6 677. Plaintiffs are informed and believe and now allege that Defendants, and
7 each of their, conduct as alleged herein was willful, reckless, and/or with knowledge,
8 subjecting Defendants, and each of them, to enhanced statutory damages, claims for
9 costs and attorneys' fees, and/or a preclusion from deducting certain costs when
10 calculating disgorgeable profits.

11 **Second Claim for Relief**

12 *(For Vicarious and/or Contributory Copyright Infringement - Against all*
13 *Defendants)*

14 678. Plaintiffs repeat, re-allege, and incorporate by reference all preceding
15 paragraphs of this Complaint.

16 679. Plaintiffs are informed and believe and now allege that Defendants
17 knowingly induced, participated in, aided and abetted in and profited from the illegal
18 reproduction, distribution, and publication of the Infringing Works as alleged above.
19 Specifically, the producers (including, but not limited to, Sony, Ultra, UMG,)
20 underwrote, facilitated, and participated in the illegal copying and infringing of the
21 individual musician Defendants during the creation of the Infringing Works and
22 realized profits through their respective distribution, and publication of the respective
23 Infringing Works. And Defendants, and each of them, collaborated with other artists
24 to create the Infringing Works, and, in doing so, knowingly incorporated maerial
25 elements from the compositions and sound recordings of *Fish Market* and *Pounder*
26 and the composition of *Dem Bow*, with knowledge that they did not have the requisite
27 consent.
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1 680. Plaintiffs are informed and believe and now allege that Defendants, and
2 each of them, are vicariously liable for the infringement alleged herein because they
3 had the right and ability to supervise the infringing conduct and because they had a
4 direct financial interest in the infringing conduct. Specifically, each Defendant
5 involved in the infringement had the ability to oversee the publication and
6 distribution of the Infringing Works. And, Defendants, and each of them, realized
7 profits through their respective obtainment, distribution, and publication of the
8 Infringing Works. On information and belief it is alleged that to the extent that any
9 Defendant collaborated with another artist to create one or more of the Infringing
10 Works, that Defendant is vicariously liable for that other artist's infringement
11 because Defendants were able to supervise and or control the infringing conduct and
12 profited from the infringement.

13 681. By reason of Defendants', and each of their, acts of contributory and
14 vicarious infringement as alleged above, Plaintiffs have suffered and will continue to
15 suffer substantial damages in an amount to be established at trial, as well as
16 additional actual, general, and special damages in an amount to be established at trial.

17 682. Due to Defendants' acts of copyright infringement as alleged herein,
18 Defendants, and each of them, have obtained direct and indirect profits they would
19 not otherwise have realized but for their infringement of Plaintiffs' rights. As such,
20 Plaintiffs are entitled to disgorgement of Defendants' profits directly and indirectly
21 attributable to Defendants' infringement of Plaintiffs' rights in their copyrighted
22 compositions and sound recordings in an amount to be established at trial.

23 683. Plaintiffs are informed and believe and now allege that Defendants, and
24 each of their, conduct as alleged herein was willful, reckless, and/or with knowledge,
25 subjecting Defendants, and each of them, to enhanced statutory damages, claims for
26 costs and attorneys' fees, and/or a preclusion from deducting certain costs when
27 calculating disgorgeable profits.

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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.

1 Plaintiff demands a jury trial on all issues so triable pursuant to Fed. R. Civ. P.
2 38 and the 7th Amendment to the United States Constitution.

3 Respectfully submitted,

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5 Dated: April 22, 2023 By: /s/ Scott Alan Burroughs
6 Scott Alan Burroughs, Esq.
7 Frank F. Trechsel, Esq.
8 Benjamin F. Tookey, Esq.
9 DONIGER / BURROUGHS
10 Attorneys for Plaintiffs
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