

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Case Number:  
07-CV-11446

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SONY BMG MUSIC ENTERTAINMENT, a  
Delaware general partnership; WARNER  
BROS. RECORDS INC., a Delaware  
Corporation; ATLANTIC RECORDING  
CORPORATION, a Delaware corporation;  
ARISTA RECORDS LLC, a Delaware limited  
Liability company; and UMG RECORDINGS,  
INC., a Delaware corporation,

Plaintiffs,

Vs.

JOEL TENENBAUM,

Defendant.

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**ANSWER**

Defendant asserts the following answers to the claims in the Complaint.

**JURISDICTION AND VENUE**

1. Admits to the best of his knowledge that this is true.
2. Admits to the best of his knowledge that this is true.
3. The Defendant does not have any knowledge of whether or not the Court has personal jurisdiction over the Defendant as well as whether or not venue exists in this District, or whether or not the alleged acts of infringement complained of occurred in this District.

**PARTIES**

4. Defendant has no personal knowledge of whether or not Plaintiff SONY BMG MUSIC ENTERTAINMENT is a Delaware general partnership with its principal place of business in the State of New York.

5. Defendant has no personal knowledge of whether or not Plaintiff WARNER BROS. RECORDS INC., is a corporation duly organized and existing under the laws of the State of Delaware, with its principal place of business in the State of California.

6. Defendant has no personal knowledge of whether or not Plaintiff ATLANTIC RECORDING CORPORATION, is a corporation duly organized and existing under the laws of the State of Delaware, with its principal place of business in the State of New York.

7. Defendant has no personal knowledge of whether or not Plaintiff ARISTA RECORDS LLC is a limited liability company duly organized and existing under the laws of the State of Delaware, with its principal place of business in the State of New York.

8. Defendant has no personal knowledge of whether of not Plaintiff UMG RECORDINGS, INC., is a corporation duly organized and existing under the laws of the State of Delaware, with its principal place of business in the State of California.

9. Defendant does not have any personal knowledge of whether or not he is an individual residing in this District.

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U.S. DISTRICT COURT  
DISTRICT OF MASS.

## COUNT I

### INFRINGEMENT OF COPYRIGHTS

10. Defendant admits that the Plaintiffs incorporate herein by this reference each and every allegation contained in each paragraph above.

11. Defendant has no knowledge of whether or not Plaintiffs are, or at all relevant times have been, the copyright owners or licensees of exclusive rights under United States copyright with respect to certain copyrighted sounds recordings (the "Copyrighted Recordings"). The Defendant further has no knowledge of what is included in the Copyrighted Recordings as are identified in Exhibit A attached to the Summons and Complaint, and which is allegedly the subject of a valid Certificate of Copyright Registration issued by the Register of Copyrights. Defendant further has no knowledge of whether the sound recordings listed in Exhibit B which is attached to the Summons and Complaint are owned by or exclusively licensed to one or more of the Plaintiffs or Plaintiffs' affiliate record labels, and which are subject to valid Certificates of Copyright Registration issued by the Register of Copyrights.

12. Defendant has no knowledge of whether among the exclusive rights granted to each Plaintiff under the Copyright Act are the exclusive rights to reproduce the Copyrighted Recordings and to distribute the Copyrighted Recordings to the public.

13. Defendant denies that he used or continued to use an online media distribution system to download the Copyrighted Recordings, to distribute the Copyrighted Recordings to the public, and/or made Copyrighted Recordings available for distribution to others. Defendant denies that he violated Plaintiffs' exclusive rights of reproduction and distribution. Defendant has no knowledge or belief that any or his actions constituted infringements of Plaintiffs' copyrights and exclusive rights under copyright.

14. Defendant has no recollection of whether or not any properly placed notices of copyrights pursuant to 17 U.S.C. Section 401 appeared on album covers of the sound recordings identified in Exhibit A. Defendant denies having seen many or most of the sound recordings identified in Exhibit A.

15. Defendant denies that any actions on his part which allegedly amounted to acts of infringements were willful or intentional, nor were any of his actions in disregard of and with indifference to the rights of Plaintiffs.

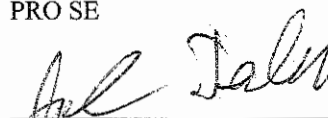
16. Defendant denies that any actions on his parts resulted in damages pursuant to 17 U.S.C. Section 504 subsection c. Therefore, defendant would also deny that his actions on his part, entitle Plaintiffs to their attorneys' fees and costs pursuant to 17 U.S.C. Section 505.

17. Defendant denies that his conduct has caused, continues to cause, or will continue to cause any great or irreparable injury

WHEREFORE, Defendant prays for this matter against him to be dismissed and for such other and

further relief as this court deems just and equitable.

JOEL TENENBAUM  
PRO SE



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Joel Tenenbaum  
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Dated: September 1, 2007