

EXHIBIT

A

Copyright

United States Copyright Office

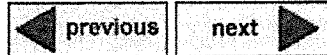
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Public Catalog

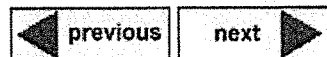
Copyright Catalog (1978 to present)

Search Request: Left Anchored Name = collage

Search Results: Displaying 77 of 115 entries

**Labeled View***Young girls / White, Wilkins, Peters ; [performed by] Collage.***Type of Work:** Music**Registration Number / Date:** PA0000180504 / 1983-07-13**Title:** Young girls / White, Wilkins, Peters ; [performed by] Collage.**Appears in:** Get in touch. Solar 60240-1 : Los Angeles : distributed by Elektra/Asylum Records. c1983. 1 sound disc : 33 1/3 rpm, stereo. : 12 in. side 1, band 1**Publisher Number:** Solar 60240-1**Copyright Claimant:** Spectrum VII Music & Yours, Mine & Ours Music**Date of Creation:** 1983**Date of Publication:** 1983-06-03**Authorship on Application:** words & music: Larry White, Grady Wilkins & Lee Peters.

Names: White, Larry
Wilkins, Grady
Peters, Lee
Collage
Spectrum VII Music
Yours, Mine & Ours Music

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EXHIBIT

B

Copyright

United States Copyright Office

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Public Catalog

Copyright Catalog (1978 to present)

Search Request: Left Anchored Title = uptown funk

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[Labeled View](#)

Uptown Funk.

Type of Work: Music

Registration Number / Date: PA0001929727 / 2014-12-18

Application Title: Uptown Funk.

Title: Uptown Funk.

Description: Electronic file (eService)

Copyright Claimant: Way Above Music, Transfer: By written agreement. Address: C/O Sony/ATV Music Publishing LLC, 424 Church Street, Nashville, TN, 37219.

Sony/ATV Music Publishing LLC, Transfer: By written agreement. Address: 424 Church Street, Nashville, TN, 37219.

Publishing Designee of Mark Ronson, Transfer: By written agreement. Address: street Unknown, city Unknown.

Publishing Designee of Bruno Mars, Transfer: By written agreement. Address: street Unknown, city Unknown.

Publishing Designee of Phillip Lawrence, Transfer: By written agreement. Address: street Unknown, city Unknown.

Date of Creation: 2014

Date of Publication: 2014-11-10

Nation of First Publication: United States

Authorship on Application: Jeff Bhasker; Citizenship: United States. Authorship: music, lyrics.

Bruno Mars; Citizenship: United States. Authorship: music, lyrics.

Mark Ronson; Citizenship: United States. Authorship: music, lyrics.

Phillip Lawrence; Citizenship: United States. Authorship: music, lyrics.

Pre-existing Material: music, lyrics, This contains a sample of "All Gold Everything" written by Devon Gallaspy & Nicholaus Williams published by Sony/ATV Music Publishing LLC and the publishing designee of Nicholaus Williams.

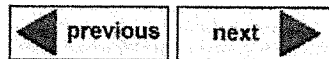
Basis of Claim: music, lyrics.

Rights and Permissions: Kent Goolsby, Sony/ATV Music Publishing LLC, Sony/ATV Music Publishing LLC, 424 Church Street, Nashville, TN, 37219, United States, kent.goolsby@sonyatv.com

Names: Bhasker, Jeff

Mars, Bruno

Ronson, Mark
Lawrence, Phillip
Way Above Music
Sony/ATV Music Publishing LLC
Publishing Designee of Mark Ronson
Publishing Designee of Bruno Mars
Publishing Designee of Phillip Lawrence



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Public Catalog

Copyright Catalog (1978 to present)

Search Request: Left Anchored Title = uptown funk

Search Results: Displaying 3 of 7 entries



[Labeled View](#)

Uptown Funk .

Type of Work: Music

Registration Number / Date: PA0001935952 / 2015-02-09

Application Title: Uptown Funk .

Title: Uptown Funk .

Appears in: Uptown Special - By Mark Ronson

Description: Compact disc.

Copyright Claimant: ZZR Music LLC, Transfer: By written agreement. Address: c/o Universal Music Corp., 2100 Colorado ave, Santa Monica, CA, 90404, United States.

Date of Creation: 2014

Date of Publication: 2014-11-10

Nation of First Publication: United States

Authorship on Application: James Trinidad, pseud. of Nicholas Joseph Williams (author of pseudonymous work); Citizenship: United States. Authorship: music, lyrics.

Philip Martin Lawrence II; Citizenship: United States. Authorship: music, lyrics.

Jeffrey Bhasker; Citizenship: United States. Authorship: music, lyrics.

Bruno Mars, pseud. of Peter Gene Hernandez (author of pseudonymous work);
Citizenship: United States. Authorship: music, lyrics.

Mark Ronson; Citizenship: United States. Authorship: music, lyrics.

Devon Christopher Gallaspy; Citizenship: United States. Authorship: music, lyrics.

Rights and Permissions: Jason Lasar, Universal Music Publishing Group, 2100 Colorado Ave., Santa Monica, CA, 90404, United States, (310) 235-4700, (310) 235-4700

Names: Williams, Nicholas Joseph

Trinidad, James, pseud.

Lawrence, Philip Martin, II

Bhasker, Jeffrey

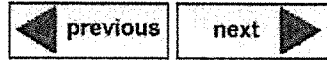
Hernandez, Peter Gene

Mars, Bruno, pseud.

Ronson, Mark

Gallaspy, Devon Christopher

ZZR Music LLC



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EXHIBIT

C

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†Also Member of U.S. Supreme Court Bar
*Also Member of Illinois Bar

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Special Counsel

RANDALL H. KENNON
Special Counsel

AUDREY C. FONG
Special Counsel

SAMUEL E. CHILAKOS
Special Counsel

November 6, 2015

VIA MAIL

Attn: President of Business and Legal Affairs
RCA Records
9830 Wilshire Blvd
Beverly Hills, CA 90212

Attn: President of Business and Legal Affairs
Atlantic Record Studios
1635 N Cahuenga Blvd
Los Angeles, California 90028

Attn: President of Business and Legal Affairs
Warner Music Group
3400 W. Olive Ave
Burbank, CA 91505

Attn: President of Business and Legal Affairs
Sony Music Entertainment
550 Madison Ave
New York, NY, 10022

Attn: President of Business and Legal Affairs
Sony Music Entertainment UK
9 Derry St.
London W8 5HY, United Kingdom

Attn: President of Business and Legal Affairs
Universal Music Group
2220 Colorado Avenue
Santa Monica, CA 90404

Attn: President of Business and Legal Affairs
Warner Music Group
1633 Broadway
New York, NY 10019

Attn: President of Business and Legal Affairs
Sony Music Entertainment
9830 Wilshire Blvd
Beverly Hills, CA 90212

Attn: President of Business and Legal Affairs
Sony/ATV Ballad (BMI)
8 Music SQ W
Nashville, TN 37203

Attn: President of Business and Legal Affairs
Elektra Atlantic
3400 W Olive Ave
Burbank, CA 91505

RE: *Copyright Infringement of Larry White/Collage's "Young Girls" in Mark Ronson's "Uptown Funk"*

To Whom It May Concern:

Please be advised that this office represents Mr. Larry White (hereinafter "Mr. White") as a member of the 1980s electro-funk group "Collage." We are writing regarding the unauthorized use and ongoing infringement of our client's copyrighted musical composition and sound recording entitled "Young Girls" recorded, utilized, copied, modified and/or sampled without permission on Mark Ronson and Bruno Mars' sound recording and music composition entitled "Uptown Funk." Accordingly, Mr. White has retained us to take the appropriate steps to protect his musical composition.

Please be advised that under governing copyright law including, but not limited to the Digital Millennium Copyright Act, you may not exploit, or authorize others to exploit, Mr. White's work without his express consent. The U.S. Copyright Act expressly restricts the exploitation of copyrighted material without the express permission of the owner. Mr. White was never contacted by anyone, but not limited to the following: RCA Records Corporation, Mark Daniel Ronson, Peter Gene Hernandez, P.K.A. Bruno Mars, Jeff Bhasker, Philip Lawrence, Ari Levine, Christopher Gallaspy, Nicholas Williams P.K.A. Trinidad James, Sony Music Entertainment, Lonnie Simmons, Jason Lasar, Devon Gallaspy, MAGEM, C.V., Way Above Music (BMI), Sony/ATV Ballad (BMI), TIG7 PUBLISHING LLC, Trinlanta Publishing LLC, Mars Force Music (ASCAP),ZZR Music LLC, THOU ART THE HUNGER, Universal, Universal Motown, Atlantic, Elektra, Songs Of Zelig or any of their affiliates or agents regarding the use, modification, or continued distribution of Mr. White's copyrighted work. Moreover, Mr. White has not in the past, or currently, given any person or entity, including the aforementioned individuals and entities, or any of their affiliates or agents permission to exploit his work nor has he been compensated for such exploitation.

"Uptown Funk" is substantially and/or strikingly similar to "Young Girls," which debuted in or around 1983 and features the same "Minneapolis"/electro-funk sounds rife throughout "Uptown Funk." It is common knowledge that "Uptown Funk" was heavily influenced by the Minneapolis sound of the early 1980s, pioneered by Prince, The Time with Morris Day, Jimmy Jam, Terry Lewis The Gap Band, and Zapp among other electro-funk artists and their songs.. According to Billboard writer Sean Ross, the "Uptown Funk" was widely influenced by

Your infringement of Mr. White's copyright is a violation of 17 U.S.C. § 501. If you continue to engage in copyright infringement after receiving this letter, your actions will be evidence of "willful infringement."

You are hereby provided express notice that Mr. White and Collage do not consent to the exploitation by you, or any of your third party affiliates, in any manner, whether direct, derivative or otherwise, of his work. As such we demand that you immediately cease and desist distribution or in any other way using the musical composition "Uptown Funk" in any advertisement, performance, or display of any type in any medium. In addition, we demand an accounting of revenue gained from the exploitation of Mr. White's musical composition, and that Mr. White be compensated for the use of his work as it relates to its use and exploitation in each and every medium including, but not limited to, album sales/revenue, performance and radio revenue. We also demand that you credit all infringing content to our client in the proper manner.

Please contact my office by no later than December 1, 2015 to resolve this matter. Mr. White desires to resolve this matter amicably and assumes that you do as well. We are hopeful, therefore, that having been apprised of the foregoing, you will immediately choose at this time to agree voluntarily to our demands and avoid legal intervention. We are sure that you understand our proposal to resolve this matter without resorting to litigation is for settlement purposes only pursuant to F.R.E. § 408 and without prejudice to any of Mr. White's rights, which are expressly reserved.

Should you fail to respond in a timely manner, we intend to enforce without further notice Mr. White's rights to the fullest extent permitted by the law including, but not limited to, filing a complaint in a federal court of competent jurisdiction seeking damages, costs and attorney's fees pursuant to 17 U.S.C. § 501, et seq., moving for an injunction to halt the distribution and further exploitation of our client's material in any medium, and moving to cancel any and all existing improper copyrights of our client's work.

As Mr. White is represented by counsel, you should make no attempt to contact him directly. This is not a complete statement of all facts known to Mr. White regarding this matter. Nothing contained herein is

Even a momentary listen of both works show that they are strikingly similar. Both works can be accessed via the below Youtube addresses:

Collage- "Young Girls" (Our client)- https://www.youtube.com/watch?v=pfTr_fgOpvg

Mark Ronson ft. Bruno Mars "Uptown Funk"- <https://www.youtube.com/watch?v=OPf0YbXqDm0>

Mr. White is represented by counsel, you should make no attempt to contact him directly. This is not a complete statement of all facts known to Mr. White regarding this matter. Nothing contained herein is intended to be or shall be construed as a waiver of any of Mr. White's rights, claims and defenses, all of which are specifically reserved.

Please contact me at your earliest opportunity regarding this matter.

Sincerely,

IVIE, McNEILL & WYATT

A handwritten signature in black ink, appearing to read 'Antonio K. Kizzie', with a stylized, flowing script.

ANTONIO K. KIZZIE

cc: Rickey Ivie, Esq.
Rodney S. Diggs, Esq.

EXHIBIT

D

IVIE, McNEILL & WYATT

A PROFESSIONAL LAW CORPORATION

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*Also Member of Illinois Bar

JENNIFER R. JACOBS
Special Counsel

RANDALL H. KENNON
Special Counsel

AUDREY C. FONG
Special Counsel

SAMUEL E. CHILAKOS
Special Counsel

March 2, 2016

VIA CERTIFIED MAIL AND FAX

Pandora Media, Inc.,
Attn: Pandora Legal Department,
2101 Webster St, 16th Floor
Oakland, CA 94612.

Spotify
Attn: Legal Department, Copyright Agent
45 W. 18th Street, 7th Floor
New York, NY 10011, USA

DMCA Complaints
YouTube (Google, Inc.)
901 Cherry Ave.
San Bruno, CA 94066
Fax: +1 650 872 8513

Emmis Operating Company
40 Monument Circle, Suite 500
Indianapolis, Indiana 46204
EMAIL: copyright@emmis.com
PHONE: (317) 684-6546
FAX: (317) 684-8810

Director, Contract Administration
National Academy of Recording Arts & Sciences,
Inc.
3030 Olympic Blvd.
Santa Monica, CA 90404
Fax: (310) 581-8795

RE: ***Cease and Desist Notice Copyright Infringement of Larry White/Collage's "Young Girls" in Mark Ronson's "UptownFunk"***

To Whom It May Concern:

Please be advised that our office represents Mr. Larry White (hereinafter "Mr. White"), Mr. Lee Peters (hereinafter "Mr. Peters" and represented by his heir and daughter, Ms. Lisa Peters), and Mr. Grady Wilkins (hereinafter "Mr. Wilkins" and represented by his heir and wife, Mrs. Connie Wilkins) as a members of the 1980s electro-funk group "Collage." We are writing regarding the unauthorized use and ongoing infringement of our client's copyrighted musical composition and sound recording entitled "Young Girls" recorded, utilized, copied, modified and/or sampled without permission in Mark Ronson and Bruno Mars' sound recording and music composition entitled "Uptown Funk." Accordingly, our clients have retained us to take the appropriate steps to protect his musical composition.

Please be advised that under governing copyright law including, but not limited to the Digital Millennium Copyright Act, you may not exploit, or authorize others to exploit, our clients' work without their express consent. The U.S. Copyright Act expressly restricts the exploitation of copyrighted material

without the express permission of the owner. Mr. White was never contacted by anyone, but not limited to the following: RCA Records Corporation, Mark Daniel Ronson, Peter Gene Hernandez. P.K.A. Bruno Mars, Jeff Bhasker, Philip Lawrence, Ari Levine, Christopher Gallaspy, Nicholas Williams P.K.A. Trinidad James, Sony Music Entertainment, Lonnie Simmons, Jason Lasar, Devon Gallaspy, MAGEM, C.V., Way Above Music (BMI), Sony/ATV Ballad (BMI), TIG7 PUBLISHING LLC, Trintanta Publishing LLC, Mars Force Music (ASCAP),ZZR Music LLC, THOU ART THE HUNGER, Universal, Universal Motown, Atlantic, Elektra, Songs Of Zelig or any of their affiliates or agents regarding the use, modification, or continued distribution of our clients' copyrighted work. Moreover, our clients have not in the past, or currently, given any person or entity, including the aforementioned individuals and entities, or any of their affiliates or agents permission to exploit his work without compensation for such exploitation.

Infringement of our clients' copyright is a violation of 17 U.S.C. § 501. You are hereby provided express notice that our clients do not consent to the exploitation by you, or any of your third party affiliates, in any manner, whether direct, derivative or otherwise, of their work. As such we demand that you immediately cease and desist distribution or in any other way using the musical composition "Uptown Funk" in any advertisement, performance, or display of any type in any medium. If you continue to engage in copyright infringement after receiving this letter, your actions will be evidence of "willful infringement."

For purposes of your notice under the DMCA, please see below:

1. A description of the copyrighted work that we allege is being infringed, is our clients' music composition and sound recording, "Young Girls."
2. A description of the allegedly infringing material and information sufficient to permit you to locate the material is "Uptown Funk" by Mark Ronson and Bruno Mars.
3. Our contact information is located at the top of this letterhead.
4. It is our good faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law.
5. The information in the notification is accurate and we have the authority to enforce the copyrights that are claimed to be infringed.

In addition, we demand that you preserve any and all accountings of revenue gained from your use/exploitation of "Uptown Funk" up to this point and going forward. Destruction of such records will be considered spoliation of evidence in the ensuing federal lawsuit pertaining to this matter.

Should you continue to exploit our clients' work copied in "Uptown Funk," we intend to enforce without further notice our clients' rights to the fullest extent permitted by the law. You should make no attempt to contact our clients directly. This is not a complete statement of all facts known to us and our clients regarding this matter. Nothing contained herein is intended to be or shall be construed as a waiver of any of our clients' rights, claims and defenses, all of which are specifically reserved.

Please contact me with any questions regarding this matter.

Sincerely,

IVIE, McNEILL & WYATT



ANTONIO K. KIZZIE

cc: Rickey Ivie, Esq.
Rodney S. Diggs, Esq.
Samuel Chilakos, Esq.
Elvin Tabah, Esq.