

**UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT**

PRO MUSIC RIGHTS, LLC,

Plaintiff,

v.

APPLE INC., AMAZON.COM, INC.,  
GOOGLE LLC, YOUTUBE, LLC, SPOTIFY  
AB, SPOTIFY USA, INC., SPOTIFY  
LIMITED, SPOTIFY TECHNOLOGY S.A.,  
DIGITAL MEDIA ASSOCIATION,  
NATIONAL RELIGIOUS  
BROADCASTERS MUSIC LICENSE  
COMMITTEE, RADIO MUSIC LICENSE  
COMMITTEE, INC., THE NATIONAL  
ASSOCIATION OF AMERICAN  
WINERIES, TELEVISION MUSIC  
LICENSE COMMITTEE, LLC, 7DIGITAL  
GROUP, INC., 7DIGITAL, INC., 7DIGITAL  
GROUP PLC, 7DIGITAL LIMITED,  
DEEZER, S.A., DEEZER INC.,  
IHEARTMEDIA, INC., CONNOISSEUR  
MEDIA LLC, PANDORA MEDIA, LLC,  
RHAPSODY INTERNATIONAL, INC.,  
SOUNDCLOUD LIMITED, and  
SOUNDCLOUD INC.,

Defendants.

Civil Action No.: 3:20-cv-00309 (JAM)

Filed: August 7, 2020

**ORAL ARGUMENT REQUESTED**

**DEFENDANTS' JOINT MEMORANDUM OF LAW  
IN SUPPORT OF THEIR MOTION TO DISMISS THE COMPLAINT**

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