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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