

No. 16-771

IN THE
Supreme Court of the United States

CAPITOL RECORDS, LLC, ET AL.,
Petitioners,
v.

VIMEO, LLC, ET AL.,
Respondents.

**On Petition for a Writ of Certiorari to the
United States Court of Appeals
for the Second Circuit**

BRIEF FOR RESPONDENTS IN OPPOSITION

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QUESTION PRESENTED

Whether the safe harbor provided by the Digital Millennium Copyright Act, 17 U.S.C. § 512(c), which limits online service providers' liability for *any* "infringement of copyright," applies to infringement claims brought under state law as well as federal law, and thus extends to claims concerning sound recordings fixed before February 15, 1972, which are protected only by state law.

(i)

CORPORATE DISCLOSURE STATEMENT

Pursuant to this Court's Rule 29.6, Respondent Vimeo, Inc. ("Vimeo") is owned by IAC/InterActiveCorp ("IAC"), and no publicly held company other than IAC owns 10% or more of Vimeo's stock. Vimeo, LLC, the entity originally named in the suit below, subsequently converted into Vimeo, Inc. See Supplemental Corporate Disclosure Statement, *Capitol Records, LLC v. Vimeo, LLC*, No. 14-1048 (2d Cir.), ECF No. 265 (May 13, 2016).

Respondent Connected Ventures, LLC ("Connected Ventures") is owned by IAC, and no publicly held company other than IAC owns 10% or more of Connected Ventures' stock. Connected Ventures was formerly, but is no longer, affiliated with Vimeo. See Pet. App. 2a n.1.

No publicly held company owns 10% or more of IAC's stock.

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