

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UMG RECORDINGS, INC., a Delaware corporation; BMG MUSIC, a New York general partnership; SONY BMG MUSIC ENTERTAINMENT, a Delaware general partnership; WARNER BROS. RECORDS INC., a Delaware corporation; and ARISTA RECORDS LLC, a Delaware limited liability company,

Plaintiffs,

v.

KELSEY ALLISON,

Defendant.

) Case No.: 08 C 472

) Honorable William T. Hart

MOTION FOR DEFAULT JUDGMENT AND PERMANENT INJUNCTION

Plaintiffs, UMG Recordings, Inc., BMG Music, Sony BMG Music Entertainment, Warner Bros. Records Inc., and Arista Records LLC (collectively, the "Plaintiffs"), by and through their undersigned attorneys, and pursuant to Rule 55 of the Federal Rules of Civil Procedure, hereby move for the entry of default judgment and a permanent injunction against Defendant Kelsey Allison ("Defendant"). In support thereof, Plaintiffs respectfully state as follows:

1. On January 22, 2008, Plaintiffs filed their Complaint for Copyright Infringement (the "Complaint") against Defendant.
2. On February 8, 2008, Defendant was served with a Summons to appear in the above-captioned proceeding. As such, Defendant's responsive pleading was due on or before February 28, 2008.

3. Defendant has not appeared in this action and has not filed a responsive pleading to the Complaint.

4. Accordingly, Plaintiffs hereby move for entry of a specific default judgment against Defendant pursuant to Rule 55 of the Federal Rules of Civil Procedure.

5. Plaintiffs request statutory damages pursuant to 17 U.S.C. § 504(c) in the amount of \$7,500.00, costs pursuant to 17 U.S.C. § 505 in the amount of \$420.00, and the requested permanent injunction as set forth more fully in the Memorandum in Support of Plaintiffs' Motion for Default Judgment and Permanent Injunction (the "Memorandum"), filed contemporaneously herewith.

WHEREFORE, for the reasons stated herein and in the Memorandum, Plaintiffs respectfully request that the Court enter an Order for (1) default judgment in favor of Plaintiffs and against Defendant; (2) statutory damages in the total amount of \$7,500.00; (3) an injunction in the form sought in the Complaint; (4) costs of \$420.00; and (5) for any other relief this Court deems appropriate under the circumstances.

Respectfully submitted,

UMG RECORDINGS, INC; BMG MUSIC;
SONY BMG MUSIC ENTERTAINMENT;
WARNER BROS. RECORDS INC.; and ARISTA
RECORDS LLC,

DATED: March 18, 2008

By: /s/ Amanda C. Jones
One of their attorneys

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