

SOUTHERN DISTRICT OF NEW YORK

MELISSA FERRICK, et al.,

Plaintiff,

vs.

SPOTIFY USA INC., et al.,

Defendants.

No. 1:16-cv-08412 (AJN)

CORRECTED
DECLARATION OF CLARA PEREZ IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT

I, Clara Perez, declare and state as follows:

1. I am the General Manager of Gerencia 360 Publishing, Inc. ("G360 Publishing"), a Class Plaintiff in this action. I am also the General Manager of affiliated entities Gerencia 360 Music, Inc. ("G360 Music"), a record label, and Gerencia 360 Entertainment, Inc. ("G360 Entertainment"), a talent management company (collectively with G360 Publishing, the "G360 Companies"). The specialty of the G360 Companies is regional Mexican music.

2. My job duties include overseeing the day-to-day activities, internal operations, and administration of each of the G360 Companies. I report directly to Luis Del Villar, the CEO of the G360 Companies.

3. G360 Publishing performs music administration services such as song licensing, mechanical royalty collection and distribution, and copyright management. The copyright-related administration services provided to G360 Publishing's songwriter clients include:

- a. Registering songs with the U.S. Copyright Office;
- b. Maintaining copyright registration records, such as copyright registration

certificates received from the U.S. Copyright Office; and

- c. Tracking the copyright registration numbers of registered songs in a central database system.


4. G360 Publishing provides administration services primarily to songwriter clients who have had songs recorded on the G360 Music label. The songs administered by G360 Publishing include songs whose copyrights are owned by G360 Publishing and songs whose copyrights are not owned by G360 Publishing.

5. Generally, if G360 Publishing is asked to administer a song whose copyright registration number is unknown, we help the songwriter client locate that information. If we discover that the song is unregistered, we help the songwriter client register the song with the U.S. Copyright Office.

6. After submitting a new registration to the U.S. Copyright Office, we receive an email confirmation that contains the application number for the pending registration. We track this number while waiting to receive the copyright registration certificate from the U.S. Copyright Office.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 10th day of November, 2017, in Burbank, CA.


Clara Perez

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 13, 2017, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's SDNY Procedures for Electronic Filing.

/s/ Steven G. Sklaver
Steven G. Sklaver