

RECEIPT NUMBER  
37158

25  
Exhibits A-E

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

ORIGINAL

LEONARD JONES AND JAMES E. WHITE  
Individuals,  
Plaintiffs,

JUDGE : Battani, Marianne O.  
DECK : S. Division Civil Deck  
DATE : 08/26/2004 @ 13:12:36  
CASE NUMBER : 5:04CV60184  
CMP LEONARD JONES ET AL V MARY J  
BLIGE ET AL (DQH)

v.

MARY J. BLIGE, ANDRE ROMELL YOUNG p/k/a DR. DRE,  
BRUCE MILLER, CAMARA KAMBON, ASIAH LEWIS, MAGISTRATE JUDGE CAPEL,  
LUCHANA N. LODGE, MELVIN BRADFORD, MICHAEL ELIZONDO  
UNIVERSAL-MCA MUSIC PUBLISHING, A Division of Universal  
Studios, UNIVERSAL MUSIC GROUP INC. in its own right and as successor  
in interest to MCA RECORDS, INC. AND JOHN DOES 1 THROUGH 10  
Jointly and Severally,  
Defendants.

Gregory J. Reed (P24750)  
GREGORY J. REED & ASSOCIATES, PC  
1201 Bagley  
Detroit, MI 48226  
(313) 961-3580

U.S. DISTRICT COURT  
EAST DISTRICT  
DETROIT-PSG  
04 AUG 26 P 1:19  
FILED

**COMPLAINT FOR COPYRIGHT INFRINGEMENT, UNFAIR COMPETITION AND  
UNJUST ENRICHMENT/DEMAND FOR JURY TRIAL**

Plaintiffs, Leonard Jones and James E. White by their counsel, Gregory J. Reed &  
Associates, P.C. complain and allege the following causes of action against Defendants:

**INTRODUCTION**

1. This case involves the Defendants' blatant and unauthorized use of portions of  
Plaintiffs' preexisting musical composition, "Party Ain't Crunk" in a subsequently created  
musical composition, "Family Affair" which Defendants allege to have written and have  
manufactured, distributed and sold since the 2001 calendar year.

**JURISDICTION AND VENUE**

2. This is an action for copyright infringement arising under the Copyright Act of the 1976, 17 U.S.C. §§ 101, et. seq. ("The Copyright Act") unfair competition and unjust enrichment.

3. This Court has exclusive jurisdiction over this action pursuant to 28 U.S.C. §1338 (a) (copyright and original jurisdiction under 28 U.S.C. §1331 (federal question) This Court also has jurisdiction pursuant to 28 U.S.C. 28 U.S.C. §1338 (b) (unfair competition). The Court has supplemental jurisdiction over the state claims pursuant to 28 U.S.C. § 1367.

4. Venue is proper in this district pursuant to 28 U.S.C. §1391 (b) and §1400.

**PARTIES**

5. Plaintiff, Leonard Jones is a musical songwriter, producer/composer and artist conducting business in the City of Detroit, State of Michigan.

6. Plaintiff, James E. White a.k.a. Jim White is a songwriter and producer conducting business in the City of Detroit, State of Michigan with Leonard Jones.

7. Leonard Jones and James E. White are collectively referred to a "Plaintiffs" throughout the remainder of this complaint.

8. Defendant Mary J. Blige is a performer, recording artist and songwriter residing in Bergen County, New Jersey and conducting business in Detroit, Michigan.

9. Defendant Andre Romell Young (p.k.a. Dr. Dre) is a producer, songwriter and recording artist residing in Los Angeles County, California, conducting business in Detroit, Michigan.

10. Defendant Bruce Miller is a songwriter, conducting business in Detroit, Michigan.

11. Defendant Camara Kambon is a songwriter, conducting business in Detroit, Michigan.

12. Defendant Asiah Lewis is a songwriter, conducting business in Detroit, Michigan.

13. Defendant Luchana N. Lodge is a songwriter, conducting business in Detroit, Michigan.

14. Defendant Melvin Bradford is a songwriter, conducting business in Detroit, Michigan.

15. Defendant Michael Elizondo is a songwriter, conducting business in Detroit, Michigan.

16. Defendant Universal-MCA Music Publishing is a California corporation, qualified to do business and doing business in the State of Michigan. Defendant Universal-MCA Music Publishing is music publishing company.

17. Defendant Universal Music Group, Inc. is a California corporation qualified to do business and doing business in the State of Michigan. At all times relevant to this action Defendant Universal Music Group, Inc. owned MCA Records, Inc. a California corporation. Currently, Defendant Universal Music Group, Inc. is a successor in interest to MCA Records, Inc. a music record company.

18. The true names and capacities of defendants DOES 1 through 10, whether individual, corporate, associate or otherwise are unknown to Plaintiff, who therefore sues such defendants by fictitious names, Plaintiffs will amend their complaint to show their true names and capacities when they have been ascertained. Plaintiff alleges that each Defendant designated in this complaint as JOHN DOES 1 through 10, was in some manner, a factor in causing Plaintiff's damages alleged in this complaint.

**FACTUAL ALLEGATIONS**

19. Leonard Jones is the owner and creator of the musical composition, "Party Ain't a Party" and provided the song work-product to be used for creating "Party Ain't Crunk" by Jim White from Leonard Jones' "Party Ain't a Party" by mutual consent between the parties.

20. On "Party Ain't Crunk", Plaintiff James White, copyright claimant, registered "Party Ain't Crunk" under Benevolent Vol. I with the U.S. Copyright Office under Registration Number PAU 2-595-487. (Exhibit A) Plaintiff Leonard Jones also has copyright and publishing interests in "Party Ain't Crunk" pursuant to an agreement with Plaintiff James White.

21. Sometime prior to May 30, 2001, Plaintiff James White submitted a copy of the musical recording Benevolent Vol. I comprised of "Party Ain't Crunk" to MCA Records for them to consider recording it for one of their artists.

22. On or about May 30, 2001 Joann from MCA Records returned the recording of "Party Ain't Crunk" as a part of Benevolent Vol. I recording to Plaintiff James E. White by U.S. mail (Exhibit B) along with a note indicating that "MCA Records is not accepting any unsolicited material at this time." (Exhibit C)

23. On or about August 28, 2001 three months after Plaintiff James E. White submitted "Party Ain't Crunk" recording as a part of Benevolent Vol. I to MCA Records, Defendant Mary J. Blige recorded and released on MCA Records, Inc. an album entitled, "No More Drama," which contained a song entitled "Family Affair"

24. Portions of "Party Ain't Crunk" are copied and incorporated into "Family Affair."

25. The credits listed in the CD package insert for "No More Drama" do not list Plaintiffs as authors or contributors to "Family Affair." (Exhibit D)

26. Multiple versions of the song "Family Affair" have been released worldwide. "Family Affair" is Defendant Mary J. Blige's most successful single in her 12 year career.

27. "No More Drama" the CD that features "Family Affair" has been certified as double platinum (2 million album sold) by the Recording industry Association of America on February 19, 2002. (Exhibit E). Defendant Universal Music Group Inc. also released "Family Affair" as a single.

28. Defendant Mary J. Blige released and starred in a music video related to the song "Family Affair" The video contains the same portions of "Party Ain't Crunk" as the song "Family Affair."

29. No credit was given to Plaintiffs in the video as having composed any music in the video.

30. The words and music to "Family Affair have been registered with the U.S. Copyright Office at least three times under Registration Numbers, PA -1-066-345 on December 3, 2001, PA-1-075-337 on March 18, 2002, and PA-084-893 on June 13, 2002. Each registration lists Defendants as authors and/or copyright claimants. None of the registrations give the Plaintiffs any credit for composing any of the music contained in "Family Affair."

**COUNT I**  
**(Copyright Infringement)**

31. Plaintiffs hereby incorporate by reference each allegation contained in Paragraphs 1 through 30 hereinabove and incorporate them, each and all herein by this reference.

32. Plaintiffs are the sole owners of the exclusive copyright to "Party Ain't Crunk."

33. Plaintiffs have not granted Defendants a license to reproduce, distribute, publicly perform or in any way use compile or exploit, "Party Ain't Crunk."

34. Defendants unlawfully and willfully copied all or a part of "Party Ain't Crunk" and incorporated it into the song "Family Affair" and the video based on that song, involving making, distributing, advertising, promoting, broadcasting, or authorizing the making, distribution, advertisement, promotion and broadcast of the song and video, selling, participating in and further such infringing acts or sharing in the proceeds there from, all infringing on Plaintiffs' copyright in "Party Ain't Crunk" [Benevolent Vol. I].

35. The music contained in the song "Family Affair" and the music video based on it is substantially similar to "Party Ain't Crunk."

36. Plaintiff's have lost substantial revenue from Defendants' unlawful and willful copying of "Party Ain't Crunk", their failure to remit to Plaintiffs their rightful share of income generated from the song "Family Affair" and their failure to obtain licenses from Plaintiffs for their uses of "Party Ain't Crunk" Plaintiffs are unaware of the exact amount of such profits derived and received by Defendants, however, they will seek leave to amend this paragraph when the amount of said profits has been ascertained

37. Plaintiffs are entitled to an injunction restraining Defendants, their agents and employees, and all persons acting in concert with them from engaging in any further acts in violation of copyright laws.

38. Defendants direct and willful acts of infringement have and will cause irreparable harm to Plaintiffs unless such conduct is preliminarily and permanently enjoined.

**COUNT II**  
**(Unfair Competition)**

39. Plaintiffs hereby incorporate by reference each allegation contained in Paragraphs 1 through 38 hereinabove and incorporate them, each and all herein by this reference

40. Defendants' wrongful acts of unfair competition consist of utilizing "Party Ain't Crunk" for the specific purpose of creating the false impression that Defendants and not Plaintiffs were composers and contributors to the song "Family Affair"

41. Defendants have by copying and unfair device, induced the general public to believe that they have the right to reproduce, distribute, publicly perform or in any way use compile or exploit, "Party Ain't Crunk."

42. Defendants have received and obtained substantial gains, profits, advantages and benefits which Plaintiffs rightfully deserve, by reason of their wrongful acts of unfair competition.

43. As a result of their wrongful acts of unfair competition Defendants have appropriated to themselves the value of the "Party Ain't Crunk" that Plaintiffs have acquired by virtue of their status as copyright claimants in that musical composition.

44. A natural, probable and foreseeable consequence of the Defendants' wrongful acts of unfair competition resulted in substantial deception to the general public.

45. Defendants' wrongful acts constitute unfair competition under the laws of the State of Michigan.

46. Plaintiffs are entitled to recover from Defendant monetary damages they suffered as a result Defendants' wrongful acts of unfair competition.

**COUNT III**  
**(Unjust Enrichment)**

47. Plaintiffs hereby incorporate by reference each allegation contained in Paragraphs 1 through 46 hereinabove and incorporate them, each and all herein by this reference.

48. Defendants have received and obtained substantial gains, advantages and benefits from their unauthorized use of the song, "Party Ain't Crunk."

49. It is inequitable and unjust for the Defendants to retain those gains, advantages and benefits.

50. Defendants have enriched themselves at the expense and to the detriment of the Plaintiffs and retained such benefit without compensating Plaintiffs for such use.

51. Defendants should not in equity and good conscious be permitted to retain the benefit that they have received as a result of their unlawful conduct.

52. As a result of Defendants' unjust enrichment, Plaintiffs are entitled to receive the reasonable value of the benefit they have received in an amount to be determined at trial, with applicable attorney's fees and costs.

WHEREFORE, Plaintiffs pray for judgment against Defendants jointly and severally, as follows:

1. The Defendants and their respective officers, agents, servants, employees and attorneys and each of them, and all persons in active concert or participation with them be forthwith temporarily and permanently enjoined and restrained from:

- a) manufacturing, distributing, selling or offering for sale songs for use by purchasers thereof to copy or otherwise infringe copyrighted songs owned by Plaintiffs;



- b) using songs to copy material owned and copyrighted by Plaintiffs;
- c) advertising or in any way representing that song may be used for the purpose of making copies of the song owned and copyrighted by Plaintiffs; and
- d) exhibiting or playing song copies made by Defendants, and each of them, songs owned and copyrighted by Plaintiffs.

2. That Defendants be required to pay to Plaintiffs such damages as Plaintiffs have sustained in consequence of Defendants' infringement of said copyright and said unfair practices and unfair competition and to account and pay in excess of \$3,000,000 for:

- a) all gains, profits and advantages derived by Defendants by said trade practices and unfair competition; and
- b) all gains, profits and advantages derived by Defendants by their infringement of Plaintiffs' copyright or such damages as to the court shall appear proper within the provisions of the copyrights statutes.

3. That Defendants be required to deliver up to be impounded during the pendency of this action all copies of said record entitled "Family Affair" in their possession or under their control and to deliver up for destruction all infringing copies and all plates, molds, and other matter for making such infringing copies.

4. That Defendants be adjudged to have infringed Plaintiff's copyrights in the recording of the single "Family Affair" which is a song on the album entitled "No More Drama."

5. That Defendants be adjudged to have infringed Plaintiff's copyrights in songs, which Plaintiffs prove at trial to have been sampled by Defendants;

6. The defendants be adjudged to have competed unfairly with Plaintiffs and engaged in unfair competition in violation of Michigan laws;

7. The Defendants be adjudged to have been unjustly enriched;

8. For damages suffered by Plaintiffs according to proof adduced at trial;

9. For the profits received by Defendants as a result of the acts and conduct of said Defendants, alleged in this complaint, and for an accounting from Defendants, and each of the Defendants to determine said profits in an amount of \$500,000 individually for the party's infringement;

10. That Defendants be required to deliver to the United States Marshal to be impounded during the pendency of this action all copies of copyrighted songs owned by Plaintiffs, or portions thereof;

11. For costs of suit, including reasonable attorneys' fees, incurred herein; and

12. For such other further relief as to the Court may deem just and proper.

Dated: Aug. 19, 2004

Respectfully submitted,

By: Gregory J. Reed  
Gregory J. Reed (P24750)  
Attorney for Plaintiffs  
GREGORY J. REED & ASSOCIATES, PC  
1201 Bagley Avenue  
Detroit, Michigan 48226  
(313) 961-3580

**DEMAND FOR JURY TRIAL**

Plaintiffs, Leonard Jones and James E. White by their counsel, Gregory J. Reed & Associates, P.C. demand a jury trial in the instant action.

Dated: August 19, 2004

Respectfully submitted,

By: 

Gregory J. Reed (P24750)

Attorney for Plaintiffs

GREGORY J. REED & ASSOCIATES

1201 Bagley Avenue

Detroit, Michigan 48226

(313) 961-3580

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EXHIBITS IN SUPPORT OF  
COMPLAINT FOR COPYRIGHT INFRINGEMENT, UNFAIR COMPETITION AND  
UNJUST ENRICHMENT/DEMAND FOR JURY TRIAL

- EXHIBIT A Copyright Registration for Benevolent Vol. I ["Party Ain't Crunk"]
- EXHIBIT B Copy of the envelope with a postage meter date stamped May 30, 2001 from Universal Music Group addressed to Jim White returning the recording of the musical composition "Party Ain't Crunk"
- EXHIBIT C Note from JoAnn at MCA Records, enclosed with the returned recording of the musical composition, "Party Ain't Crunk" indicating MCA is not accepting unsolicited material.
- EXHIBIT D Copy of CD insert of credits listed for the song "Family Affair"
- EXHIBIT E RIAA Gold and Platinum Search results for "No More Drama" CD

EXHIBIT A

# CERTIFICATE OF REGISTRATION

UNITED STATES COPYRIGHT OFFICE  
 REGISTRATION NUMBER  
**PAU 2-595-487**  
 EFFECTIVE DATE OF REGISTRATION  
 May 7 2001



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Marybeth Peters*  
 REGISTER OF COPYRIGHTS  
 United States of America

OFFICIAL SEAL

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

TITLE OF THIS WORK  
**Benevolent Vol. 1**

PREVIOUS OR ALTERNATIVE TITLES  
**NA**

NATURE OF THIS WORK  
**WORDS & MUSIC**

NAME OF AUTHOR  
**Tim Acker**

DATES OF BIRTH AND DEATH  
 Year Born: **7-4-82**  
 Year Died: \_\_\_\_\_

Was this contribution to the work a "work made for hire"?  
 Yes  No  
 AUTHOR'S NATIONALITY OR DOMICILE  
 Name of Country: **USA**  
 OR Citizen of: **USA**  
 Domiciled in: **USA**

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK  
 Anonymous?  Yes  No  
 Pseudonymous?  Yes  No

NATURE OF AUTHORSHIP  
**WORDS**  
 Briefly describe nature of the material created by this author in which copyright is claimed

NAME OF AUTHOR  
**Dannie Longmire**

DATES OF BIRTH AND DEATH  
 Year Born: **8-9-67**  
 Year Died: \_\_\_\_\_

Was this contribution to the work a "work made for hire"?  
 Yes  No  
 AUTHOR'S NATIONALITY OR DOMICILE  
 Name of Country: **USA**  
 OR Citizen of: **USA**  
 Domiciled in: **USA**

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK  
 Anonymous?  Yes  No  
 Pseudonymous?  Yes  No

NATURE OF AUTHORSHIP  
**MUSIC**  
 Briefly describe nature of the material created by this author in which copyright is claimed

NAME OF AUTHOR  
**James E. White Jr.**

DATES OF BIRTH AND DEATH  
 Year Born: **10/16/54**  
 Year Died: \_\_\_\_\_

Was this contribution to the work a "work made for hire"?  
 Yes  No  
 AUTHOR'S NATIONALITY OR DOMICILE  
 Name of Country: **USA**  
 OR Citizen of: **USA**  
 Domiciled in: **USA**

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK  
 Anonymous?  Yes  No  
 Pseudonymous?  Yes  No

NATURE OF AUTHORSHIP  
**WORDS**  
 Briefly describe nature of the material created by this author in which copyright is claimed

YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED  
**2001**

DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK  
 Complete this information ONLY if this work has been published.  
 Month: \_\_\_\_\_ Day: \_\_\_\_\_ Year: \_\_\_\_\_

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2.  
**James E. White  
 9244 Wilshire Blvd.  
 Beverly Hills CA 90210**

APPLICATION RECEIVED  
**MAY 07 2001**  
 ONE DEPOSIT RECEIVED  
**MAY 07 2001**  
 TWO DEPOSITS RECEIVED  
 REMITTANCE NUMBER AND DATE

TRANSFER If the claimant(s) named here in space 4 are different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright.

**NOTE**  
 Under the law, the "author" of a work made for hire is generally the employer or the employee (see instructions) For any part of this work that was made for hire, check "Yes" in the space provided give the employer (or other person for whom the work was prepared) as Author of that part and leave the space for dates of birth and death blank.

See instructions before completing this space

DO NOT WRITE HERE OFFICE USE ONLY

**MORE ON BACK** • Complete all applicable spaces (numbers 5-9) on the reverse side of this page  
 • See detailed instructions • Sign the form at line 8

DO NOT WRITE HERE

EXAMINED BY

*msb*

FORM PA

CHECKED BY

CORRESPONDENCE  
Yes

FOR  
COPYRIGHT  
OFFICE  
USE  
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

**PREVIOUS REGISTRATION** Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

Yes  No If your answer is "Yes," why is another registration being sought? (Check appropriate box) ▼

a.  This is the first published edition of a work previously registered in unpublished form.

b.  This is the first application submitted by this author as copyright claimant.

c.  This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number ▼

Year of Registration ▼

**DERIVATIVE WORK OR COMPILATION** Complete both space 6a & 6b for a derivative work; complete only 6b for a compilation

a. **Preexisting Material** Identify any preexisting work or works that this work is based on or incorporates. ▼

b. **Material Added to This Work** Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

**DEPOSIT ACCOUNT** If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

Name ▼

Account Number ▼

**CORRESPONDENCE** Give name and address to which correspondence about this application should be sent. Name, Address Apt. City State Zip ▼

*James E. White  
9244 Wilshire Blvd.  
Beverly Hills CA 90210*

Area Code & Telephone Number ▶ *310 771 2960*

**CERTIFICATION\*** I, the undersigned, hereby certify that I am the

Check only one ▼

author

other copyright claimant

owner of exclusive right(s)

authorized agent of

Name of author or other copyright claimant, or owner of exclusive right(s) ▲

*James E. White Jr*

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Typed or printed name and date ▼ If this application gives a date of publication in space 3, do not sign and submit it before that date.

*James E. White Jr*

date ▶ *5-1-2001*

Handwritten signature (X) ▼

*James E. White Jr*

MAIL  
CERTIFICATE TO

Name ▼	<i>James E. White Jr</i>
Number Street, Apartment Number ▼	<i>9244 Wilshire Blvd,</i>
City State, ZIP ▼	<i>Beverly Hills CA 90210</i>

Certificate will be mailed in window envelope

- Complete all necessary spaces
- Sign your application in space 8

1. Application form
2. Nonrefundable \$20 filing fee in check or money order payable to Register of Copyrights
3. Deposit material

Register of Copyrights  
Library of Congress  
Washington, D.C. 20559

\* 17 USC § 506(e). Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409 or in any written statement filed in connection with the application shall be fined not more than \$2,500.

5

6

See instructions before completing this space

7

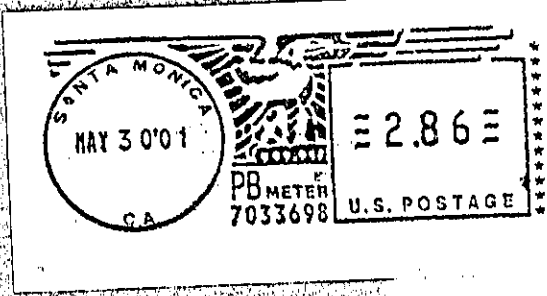
Be sure to give your daytime phone number

8

9

**EXHIBIT B**





Box  
7701



McKaie  
#301

UNIVERSAL MUSIC GROUP  
2220 COLORADO AVENUE SANTA MONICA CA 90404

Mr. Jim White  
JWE STUDIO  
9244 Wilshire Boulevard  
Beverly Hills, CA 90210

EXHIBIT C

Jim:

MEA is not

accepting any

unrelated material

At this time, say

John

MOA

**EXHIBIT D**

RMSI 06

NO MORE DRAMA 06

PRODUCED BY CHUCKY THOMPSON FOR  
CHUCKY THOMPSON PRODUCTIONS, INC.

Written by Mary J. Blige, Terri Robinson,  
Tara Tilman, Chucky Thompson and Al Green.

Background vocals by Mary J. Blige.

Lead vocals by Mary J. Blige.

Lead guitar by Billy Gibbons.

Recorded by Jason Goldstein at Right Track Recording Studio,  
New York, NY; Tom Ferez and Ken Schubert at Cue Recording  
Studio, Falls Church, VA; and Yuri Zwiadluk at  
East Coast Flava Recording Studio, Washington, DC.

Recorded and Mixed at Impressions, New York, NY.

Mixed by Tony Masera at The Hit Factory,  
New York, NY; and Yuri Zwiadluk at East Coast Flava  
Recording Studios, Washington, DC.

Guitar solo by Lonny Lovitt, recorded by  
Matt Knobler at Rox Records, Miami, FL.

Publishers: Sony/ATV Music/A&M Music (ASCAP)/  
Universal Music Corp (ASCAP)/Terri Robinson Designee/  
Tara Tilman Designee/Irving Music, Inc. (BMI)/Al Green  
Music, Inc. (administered by Irving Music, Inc.) Contains a  
sample of "Simply Beautiful" (Written by Al Green)/Published  
by Irving Music, Inc./Al Green Music, Inc. (BMI)

PRODUCED BY JIMMY JAM AND TERRY LEWIS FOR  
FLYTE TIME PRODUCTIONS, INC.

Written by James Harris III, Terry Lewis,  
Barry DeVorzan, and Perry Porkin, Jr.

Lead vocals by Mary J. Blige.

Background vocals by Mary J. Blige.

Big Jim Wright, David Hurst, David Hughes,  
Jewellynn Green, and LaTonia Wright-Hughes.

Drum programming by Alex Nicholburg.

Organ by Jim Wright / Guitar by Mike Scott.

All other instruments by Jimmy Jam and Terry Lewis.

Background vocals recorded by Steve Hodge at  
Flyte Time Studios, Edina, MN, assisted by Xavier Smith.

Mary J. Blige vocals recorded by Steve Hodge at  
The Hit Factory, New York, NY, assisted by Kurtis Marshall.

Mixed by Steve Hodge at Flyte Time Studios,  
Edina, MN, assisted by Xavier Smith.

Publishers: EML April Music, Inc., for itself and  
on behalf of Flyte Time Tunes (ASCAP)/Screen Gems-EMI  
Music, Inc. (BMI). "No More Drama" embodies portions  
of "The Young and the Restless Theme" written by  
Barry DeVorzan and Perry Porkin, Jr. published  
by Screen Gems-EMI Music, Inc. (BMI)

EXHIBIT E



## gold & platinum

### Search Results

Your search returned 3 records. Records 1 to 3 displayed.

Artist	Title	Cert. Date	Label	Award Desc.	Format	Category	Type
BLIGE, MARY J.	NO MORE DRAMA	10/12/01	MCA	G	ALBUM	SOLO	Std
BLIGE, MARY J.	NO MORE DRAMA	10/12/01	MCA	P	ALBUM	SOLO	Std
BLIGE, MARY J.	NO MORE DRAMA	02/19/02	MCA	M (2)	ALBUM	SOLO	Std

1

searchable database  
history  
certification  
making the awards  
los premios awards  
bestsellers  
photos

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**CIVIL COVER SHEET** COUNTY IN WHICH THIS ACTION AROSE: Wayne

This is a 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for use of the Clerk of Court for the purpose of initiating the civil docket sheet.

**I. (a) PLAINTIFFS**

Leonard Jones and James E. White **04-60184**

**DEFENDANTS**

Mary J. Blige, Andre Romell Young p/k/a Dr. Dre, Bruce Miller, Camara Kambon, Asiah Lewis, Luchana N. Lodge, Melvin Bradford, Michael Elizondo, Universal-MCA Music Publishing, et al.

(b) County of Residence of First Listed Wayne  
*26163*

County of Residence of First Listed Bergen  
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

(c) Attorney's (Firm Name, Address, and Telephone Number)  
Gregory J. Reed (P24750)  
Gregory J. Reed & Associates, PC, 1201 Bagley, Detroit, MI 48226 (313) 961-3580

Attorneys (If Known) **MAGISTRATE JUDGE CAPEL,**  
**JUDGE MARIANNE O. BATTANI**

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
- 3 Federal Question (U.S. Government Not a Party)
- 2 U.S. Government Defendant
- 4 Diversity (Indicate Citizenship of Parties in Item 111)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   |                            |                            |   |                            |                            |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
|   | PLA                        | DEF                        |   | PLA                        | DEF                        |
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another                      | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal of Business in Another State   | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS		FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment and Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault Libel And Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	<b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury-Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21: 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <hr/> <b>PROPERTY RIGHTS</b> <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced & Corrupt Organizations <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Com mod. Invest. Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 990 Other Statutory Actions
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 H1A (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DWC/DWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <hr/> <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609	

**V. ORIGIN** (PLACE AN "X" IN ONE BOX ONLY)

- 1 Original Proceeding
- 2 Removed from State Court
- 3 Remanded from Appellate Court
- 4 Reinstated or Reopened
- 5 Transferred from another district (specify)
- 6 Multi district Litigation
- 7 Judge from Appeal to District Magistrate

**VI. CAUSE OF ACTION** (Cite the U.S. Civil Statute under which you are filing and write brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

Copyright Infringement

**VII. REQUESTED IN COMPLAINT:**  CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 \$ DEMAND \_\_\_\_\_ CHECK YES only if demanded in complaint: JURY DEMAND:  Yes  No

**VIII. RELATED CASE(S) IF ANY** (See Instructions): \_\_\_\_\_

DATE 8-25-04 JUDGE \_\_\_\_\_ DOCKET NUMBER \_\_\_\_\_

SIGNATURE OF ATTORNEY OF RECORD  
*Gregory J. Reed*



SUANT TO LOCAL RULE 83.11

1. Is this a case that has been previously dismissed?

Yes

No

If yes, give the following information:

Court: \_\_\_\_\_

Case No.: \_\_\_\_\_

Judge: \_\_\_\_\_

2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.)

Yes

No

If yes, give the following information:

Court: \_\_\_\_\_

Case No.: \_\_\_\_\_

Judge: \_\_\_\_\_

Notes :

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