

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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SAMUEL BARTLEY STEELE,	:	
BART STEELE PUBLISHING, and	:	
STEELE RECORDZ,	:	
	:	
Plaintiffs,	:	Civil Action
v.	:	No. 08-11727-NMG
	:	
TURNER BROADCASTING SYSTEM, INC.,	:	
MAJOR LEAGUE PROPERTIES, INC.,	:	
TIME WARNER, INC., ISLAND DEF JAM	:	
RECORDS, FOX BROADCASTING	:	
COMPANY, JOHN BONGIOVI,	:	
INDIVIDUALLY AND D/B/A BON JOVI	:	
PUBLISHING, RICHARD SAMBORA,	:	
INDIVIDUALLY AND D/B/A AGGRESSIVE	:	
MUSIC, WILLIAM FALCON,	:	
INDIVIDUALLY AND D/B/A PRETTY	:	
BLUE SONGS, UNIVERSAL-POLYGRAM	:	
INTERNATIONAL PUBLISHING, INC.,	:	
SONY/ATV TUNES LLC, KOBALT MUSIC	:	
GROUP, A&E TELEVISION NETWORKS,	:	
AEG LIVE LLC, VECTOR 2 LLC, BOSTON	:	
RED SOX, INC., THE BIGGER PICTURE	:	
CINEMA CO., and MARK SHIMMEL	:	
MUSIC,	:	
	:	
Defendants.	:	

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**DECLARATION OF ETHAN ORLINSKY  
IN SUPPORT OF DEFENDANT MAJOR LEAGUE BASEBALL  
PROPERTIES, INC.'S OPPOSITION TO PLAINTIFFS' RULE 55(A)  
MOTION FOR ENTRY OF DEFAULT AGAINST MLB ADVANCED MEDIA, L.P.**

I, ETHAN ORLINSKY, pursuant to 28 U.S.C. § 1746, declare and state as follows:

1. I am Senior Vice President and General Counsel of Major League Baseball Properties, Inc. ("MLB Properties"), a defendant herein.

2. MLB Properties is a New York corporation owned by Major League Baseball Enterprises, Inc. MLB Properties is responsible for managing consumer product licensing activities, cultivating sponsorship opportunities with major consumer brands and corporations, growing the game and the business of baseball outside the United States, and creating national marketing programs in conjunction with Clubs, broadcast rightsholders, and national sponsors.

3. "Major League Baseball Productions" is a division of MLB Properties. It is a full-service video and audio production unit.

4. I am familiar with MLB Advanced Media, L.P. It is a Delaware limited partnership owned by MLB Media Holdings, L.P. and MLB Advanced Media, Inc. As a legal entity, it is completely separate from MLB Properties and from MLB Productions.

5. MLB Advanced Media, L.P., MLB Media Holdings, L.P., and MLB Advanced Media, Inc. do not own, and are not owned by, Defendant MLB Properties. These companies are responsible for MLB.com and other Internet and "online" activities for Major League Baseball Clubs and other MLB entities.

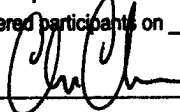
I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 29, 2010 in New York, New York.

  
\_\_\_\_\_  
Ethan Orlinsky

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on June 30, 2010.

  
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