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11 MAURICIO RENGIFO; ANDRÉS TORRES; UNIVERSAL MUSIC PUBLISHING,  
12 INC.; UMG RECORDINGS, INC.; WARNER CHAPPELL MUSIC, INC.; JUAN  
13 CARLOS OZUNA ROSADO; LUIS ALFONSO RODRÍGUEZ LÓPEZ-CEPERO

14 **UNITED STATES DISTRICT COURT**

15 **CENTRAL DISTRICT OF CALIFORNIA**

16 CLEVELAND CONSTANTINE ) Case No.: 2:21- cv-08295-AB-E  
17 BROWNE, an individual; ANIKA )

18 JOHNSON as personal representative of ) **ANSWER OF MAURICIO RENGIFO,**  
19 the Estate of WYCLIFFE JOHNSON, ) **ANDRÉS TORRES, UNIVERSAL**  
20 deceased; and STEELY & CLEVIE ) **MUSIC PUBLISHING, INC., UMG**  
21 PRODUCTIONS LTD., ) **RECORDINGS, INC., WARNER**

22 Plaintiffs,

23 ) **CHAPPELL MUSIC, INC., JUAN**  
24 ) **CARLOS OZUNA ROSADO, AND**  
25 ) **LUIS ALFONSO RODRÍGUEZ**

26 v.

27 ) **LÓPEZ-CEPERO TO FIRST**  
28 ) **AMENDED COMPLAINT**

29 LUIS ALFONSO RODRÍGUEZ )  
30 LÓPEZ-CEPERO et al. )

31 ) **DEMAND FOR JURY TRIAL**

32 Defendants. )  
33 )  
34 )  
35 )

1 Defendants Mauricio Rengifo (“Rengifo”), Andrés Torres (“Torres”), Universal  
2 Music Publishing, Inc. (“UMP”), UMG Recordings, Inc. (“UMG”), Warner Chappell  
3 Music, Inc. (“Warner Chappell”), Juan Carlos Ozuna Rosado (“Ozuna”), and Luis  
4 Alfonso Rodríguez López-Cepero (“Fonsi”, and, together with Rengifo, Torres, UMP,  
5 UMG, Warner Chappell, and Ozuna, “Defendants”), by and through their attorneys  
6 Pryor Cashman LLP, hereby respond to and answer the January 18, 2022 First Amended  
7 Complaint (“FAC”) filed on behalf of the plaintiffs Cleveland Constantine Browne  
8 (“Browne”), Anika Johnson as personal representative of the Estate of Wycliffe  
9 Johnson (“Johnson”), and Steely & Clevie Productions, Ltd. (“S&C Productions” and,  
10 together with Browne and Johnson, “Plaintiffs”), as follows:

11 **ANSWER**

12 **Jurisdiction & Venue**

13 1. Defendants deny the allegations in paragraph 1 of the FAC, aver that no  
14 response is required to the extent that the paragraph purports to state any conclusions  
15 of law, and refer the Court to the statutes referenced therein for the terms and provisions  
16 thereof.

17 2. Defendants deny the allegations in paragraph 2 of the FAC, aver that no  
18 response is required to the extent that the paragraph purports to state any conclusions  
19 of law, and refer the Court to the statutes referenced therein for the terms and provisions  
20 thereof.

21 3. Defendants deny the allegations in paragraph 3 of the FAC, aver that no  
22 response is required to the extent that the paragraph purports to state any conclusions  
23 of law, and refer the Court to the statutes referenced therein for the terms and provisions  
24 thereof.

25 **Parties**

26 4. Defendants deny knowledge or information sufficient to respond to the  
27 allegations in paragraph 4 of the FAC.

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1           5. Defendants deny knowledge or information sufficient to respond to the  
2 allegations in paragraph 5 of the FAC.

3           6. Defendants deny knowledge or information sufficient to respond to the  
4 allegations in paragraph 6 of the FAC.

5           7. Defendants deny knowledge or information sufficient to respond to the  
6 allegations in paragraph 7 of the FAC except Fonsi admits that he resides in Miami,  
7 Florida and otherwise denies the allegations in paragraph 7 of the FAC.

8           8. Defendants deny knowledge or information sufficient to respond to the  
9 allegations in paragraph 8 of the FAC except Rengifo denies that he resides in Colombia  
10 and otherwise denies the allegations in paragraph 8 of the FAC.

11           9. Defendants deny knowledge or information sufficient to respond to the  
12 allegations in paragraph 9 of the FAC except Torres denies that he resides in Colombia  
13 and otherwise denies the allegations in paragraph 9 of the FAC.

14           10. Defendants deny knowledge or information sufficient to respond to the  
15 allegations in paragraph 10 of the FAC.

16           11. Defendants deny knowledge or information sufficient to respond to the  
17 allegations in paragraph 11 of the FAC, except Ozuna denies the allegations in  
18 paragraph 11 of the FAC.

19           12. Defendants deny knowledge or information sufficient to respond to the  
20 allegations in paragraph 12 of the FAC.

21           13. Defendants deny knowledge or information sufficient to respond to the  
22 allegations in paragraph 13 of the FAC.

23           14. Defendants deny knowledge or information sufficient to respond to the  
24 allegations in paragraph 14 of the FAC.

25           15. Defendants deny knowledge or information sufficient to respond to the  
26 allegations in paragraph 15 of the FAC.

27           16. Defendants deny knowledge or information sufficient to respond to the  
28 allegations in paragraph 16 of the FAC.

1 17. Defendants deny knowledge or information sufficient to respond to the  
2 allegations in paragraph 17 of the FAC.

3 18. Defendants deny knowledge or information sufficient to respond to the  
4 allegations in paragraph 18 of the FAC.

5 19. Defendants deny knowledge or information sufficient to respond to the  
6 allegations in paragraph 19 of the FAC.

7 20. Defendants deny knowledge or information sufficient to respond to the  
8 allegations in paragraph 20 of the FAC.

9 21. Defendants deny knowledge or information sufficient to respond to the  
10 allegations in paragraph 21 of the FAC.

11 22. Defendants deny knowledge or information sufficient to respond to the  
12 allegations in paragraph 22 of the FAC.

13 23. Defendants deny knowledge or information sufficient to respond to the  
14 allegations in paragraph 23 of the FAC except UMG admits that it is a Delaware  
15 corporation with an office in Santa Monica, California.

16 24. Defendants deny knowledge or information sufficient to respond to the  
17 allegations in paragraph 24 of the FAC. Subject to and without waiving the foregoing,  
18 Defendant UMG Recordings, Inc. states that it has an unincorporated division called  
19 “Universal Music Latin Entertainment.”

20 25. Defendants deny knowledge or information sufficient to respond to the  
21 allegations in paragraph 25 of the FAC.

22 26. Defendants deny knowledge or information sufficient to respond to the  
23 allegations in paragraph 26 of the FAC except UMP admits that it is a California  
24 corporation with an office in Santa Monica, California.

25 27. Defendants deny knowledge or information sufficient to respond to the  
26 allegations in paragraph 27 of the FAC.

27 28. Defendants deny knowledge or information sufficient to respond to the  
28 allegations in paragraph 28 of the FAC except Warner Chappell admits that it is a

1 Delaware corporation with an office in Los Angeles, California.

2 29. Defendants deny knowledge or information sufficient to respond to the  
3 allegations in paragraph 29 of the FAC except Warner Chappell denies the allegations  
4 in paragraph 29 of the FAC.

5 30. Defendants deny knowledge or information sufficient to respond to the  
6 allegations in paragraph 30 of the FAC and aver that no response is required to the  
7 extent that the paragraph purports to state any conclusions of law.

8 31. Defendants aver that no response is required to the bare, conclusory, and  
9 generalized statements contained in paragraph 31 of the FAC, particularly to the extent  
10 that the paragraph purports to state any conclusions of law, but to the extent the  
11 paragraph is deemed to properly state any allegations against Defendants, those  
12 allegations are denied.

13 **Factual Background**

14 32. Defendants deny the allegations in paragraph 32 of the FAC and aver that  
15 no response is required to the extent that the paragraph purports to state any conclusions  
16 of law.

17 33. Defendants deny knowledge or information sufficient to respond to the  
18 allegations in paragraph 33 of the FAC.

19 34. Defendants deny knowledge or information sufficient to respond to the  
20 allegations in paragraph 34 of the FAC.

21 35. Defendants deny knowledge or information sufficient to respond to the  
22 allegations in paragraph 35 of the FAC.

23 36. Defendants deny knowledge or information sufficient to respond to the  
24 allegations in paragraph 36 of the FAC.

25 37. Defendants deny knowledge or information sufficient to respond to the  
26 allegations in paragraph 37 of the FAC.

27 38. Defendants deny knowledge or information sufficient to respond to the  
28 allegations in paragraph 38 of the FAC.

1           39. Defendants deny knowledge or information sufficient to respond to the  
2 allegations in paragraph 39 of the FAC, except deny that all or any portion of the  
3 referenced composition and/or sound recording “Fish Market” is original or protectible  
4 and aver that no response is required to the extent that the paragraph purports to state  
5 any conclusions of law.

6           40. Defendants deny knowledge or information sufficient to respond to the  
7 allegations in paragraph 40 of the FAC.

8           41. Defendants deny knowledge or information sufficient to respond to the  
9 allegations in paragraph 41 of the FAC.

10           42. Defendants deny the allegations in paragraph 42 of the FAC and aver that  
11 no response is required to the extent that the paragraph purports to state any conclusions  
12 of law.

13           43. Defendants deny knowledge or information sufficient to respond to the  
14 allegations in paragraph 43 of the FAC except UMG, Warner Chappell, Fonsi, and  
15 Torres deny those allegations but admit that the sound recording “Besame” was released  
16 in or about June 2021 by Universal Music Latino, a division of UMG Recordings, Inc.

17           44. Defendants deny knowledge or information sufficient to respond to the  
18 allegations in paragraph 44 of the FAC except UMG, Warner Chappell, Fonsi, and  
19 Torres deny those allegations but admit that the sound recording “Calypso” was  
20 released in or about February 2019 by Universal Music Latino, a division of UMG  
21 Recordings, Inc.

22           45. Defendants deny knowledge or information sufficient to respond to the  
23 allegations in paragraph 45 of the FAC except UMG, Warner Chappell, UMP, Fonsi,  
24 and Torres deny those allegations but admit that the sound recording “Date La Vuelta”  
25 as performed by Fonsi was released in or about April 2019 by Universal Music Latino,  
26 a division of UMG Recordings, Inc.

27           46. Defendants deny knowledge or information sufficient to respond to the  
28 allegations in paragraph 46 of the FAC except UMG and Fonsi deny those allegations

1 but admit that the sound recording “Despacito” was released in or about January 2017  
2 by Universal Music Latino, a division of UMG Recordings, Inc.

3 47. Defendants deny knowledge or information sufficient to respond to the  
4 allegations in paragraph 47 of the FAC except UMG and Fonsi deny those allegations  
5 but admit that the sound recording “Despacito Feat. Justin Bieber (Remix)” was  
6 released in or about April 2017 by Universal Music Latin Entertainment, under  
7 exclusive license to Republic Records (RBMG/Def Jam Recordings).

8 48. Defendants deny knowledge or information sufficient to respond to the  
9 allegations in paragraph 48 of the FAC except UMG, Warner Chappell, Fonsi, and  
10 Torres deny those allegations but admit that the sound recording “Echame La Culpa”  
11 was released in or about November 2017 by Universal Music Latino, a division of UMG  
12 Recordings, Inc.

13 49. Defendants deny knowledge or information sufficient to respond to the  
14 allegations in paragraph 49 of the FAC except UMG, Warner Chappell, Fonsi, and  
15 Torres deny those allegations but admit that the sound recording “Imposible” was  
16 released in or about October 2018.

17 50. Defendants deny knowledge or information sufficient to respond to the  
18 allegations in paragraph 50 of the FAC except UMG, Warner Chappell, Fonsi, and  
19 Torres deny those allegations but admit that the sound recording “Perfecta” was  
20 released in or about September 2020 by Universal Music Latino, a division of UMG  
21 Recordings, Inc.

22 51. Defendants deny knowledge or information sufficient to respond to the  
23 allegations in paragraph 51 of the FAC except UMG, Warner Chappell, Fonsi, and  
24 Torres deny those allegations but admit that the sound recording “Sola” was released in  
25 or about February 2019 by Universal Music Latino, a division of UMG Recordings, Inc.

26 52. Defendants deny knowledge or information sufficient to respond to the  
27 allegations in paragraph 52 of the FAC except UMG, Warner Chappell, Fonsi, and  
28 Torres deny those allegations but admit that the sound recording “Vacio” was released



1 in or about February 2021 by Universal Music Latino, a division of UMG Recordings,  
2 Inc.

3 53. Defendants deny the allegations in paragraph 53 of the FAC except admit  
4 that the aforementioned sound recordings garnered millions of plays and streams  
5 worldwide.

6 54. Defendants deny the allegations in paragraph 54 of the FAC and aver that  
7 no response is required to the extent that the paragraph purports to state any conclusions  
8 of law.

9 55. Defendants deny the allegations in paragraph 55 of the FAC and aver that  
10 no response is required to the extent that the paragraph purports to state any conclusions  
11 of law.

12 56. Defendants deny the allegations in paragraph 56 of the FAC and aver that  
13 no response is required to the extent that the paragraph purports to state any conclusions  
14 of law.

15 57. Defendants deny the allegations in paragraph 57 of the FAC and aver that  
16 no response is required to the extent that the paragraph purports to state any conclusions  
17 of law.

18 58. Defendants deny the allegations in paragraph 58 of the FAC and aver that  
19 no response is required to the extent that the paragraph purports to state any conclusions  
20 of law.

21 59. Defendants deny the allegations in paragraph 59 of the FAC and aver that  
22 no response is required to the extent that the paragraph purports to state any conclusions  
23 of law.

24 60. Defendants deny the allegations in paragraph 60 of the FAC and aver that  
25 no response is required to the extent that the paragraph purports to state any conclusions  
26 of law.

27 61. Defendants deny the allegations in paragraph 61 of the FAC and aver that  
28 no response is required to the extent that the paragraph purports to state any conclusions



1 of law.

2 62. Defendants deny the allegations in paragraph 62 of the FAC and aver that  
3 no response is required to the extent that the paragraph purports to state any conclusions  
4 of law.

5 63. Defendants deny the allegations in paragraph 63 of the FAC and aver that  
6 no response is required to the extent that the paragraph purports to state any conclusions  
7 of law.

8 64. Defendants deny the allegations in paragraph 64 of the FAC and aver that  
9 no response is required to the extent that the paragraph purports to state any conclusions  
10 of law.

11 65. Defendants deny the allegations in paragraph 65 of the FAC and aver that  
12 no response is required to the extent that the paragraph purports to state any conclusions  
13 of law.

14 66. Defendants deny the allegations in paragraph 66 of the FAC except admit  
15 that they did not seek or obtain authorization from Plaintiffs to use or copy “Fish  
16 Market” in connection with the aforementioned sound recordings or their underlying  
17 compositions because, inter alia, “Fish Market” was not used or copied in connection  
18 with those works and aver that no response is required to the extent that the paragraph  
19 purports to state any conclusions of law.

20 67. Defendants deny the allegations in paragraph 67 of the FAC except admit  
21 that the aforementioned sound recordings or their underlying compositions continue to  
22 be exploited and distributed, in whole or in part, by some or all of the Defendants and  
23 aver that no response is required to the extent that the paragraph purports to state any  
24 conclusions of law.

25 **First Claim for Relief**

26 68. Defendants repeat and reallege the foregoing responses set forth in  
27 paragraphs 1 through 67 above as though set forth in full.

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1           69. Defendants deny knowledge or information sufficient to respond to the  
2 allegations in paragraph 69 of the FAC.

3           70. Defendants deny knowledge or information sufficient to respond to the  
4 allegations in paragraph 70 of the FAC, except deny that all or any portion of “Fish  
5 Market” is original or protectible and aver that no response is required to the extent that  
6 the paragraph purports to state any conclusions of law.

7           71. Defendants deny knowledge or information sufficient to respond to the  
8 allegations in paragraph 71 of the FAC except deny that they had access to “Fish  
9 Market” and aver that no response is required to the extent that the paragraph purports  
10 to state any conclusions of law.

11           72. Defendants deny knowledge or information sufficient to respond to the  
12 allegations in paragraph 72 of the FAC except deny that they had access via *Ellos Benia*  
13 and the “Pounder” riddim and aver that no response is required to the extent that the  
14 paragraph purports to state any conclusions of law.

15           73. Defendants deny the allegations in paragraph 73 of the FAC and aver that  
16 no response is required to the extent that the paragraph purports to state any conclusions  
17 of law.

18           74. Defendants deny the allegations in paragraph 74 of the FAC and aver that  
19 no response is required to the extent that the paragraph purports to state any conclusions  
20 of law.

21           75. Defendants deny the allegations in paragraph 75 of the FAC and aver that  
22 no response is required to the extent that the paragraph purports to state any conclusions  
23 of law.

24           76. Defendants deny the allegations in paragraph 76 of the FAC and aver that  
25 no response is required to the extent that the paragraph purports to state any conclusions  
26 of law.

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1 77. Defendants deny the allegations in paragraph 77 of the FAC and aver that  
2 no response is required to the extent that the paragraph purports to state any conclusions  
3 of law.

4 78. Defendants deny the allegations in paragraph 78 of the FAC and aver that  
5 no response is required to the extent that the paragraph purports to state any conclusions  
6 of law.

7 79. Defendants deny the allegations in paragraph 79 of the FAC and aver that  
8 no response is required to the extent that the paragraph purports to state any conclusions  
9 of law.

10 **Second Claim for Relief**

11 80. Defendants repeat and reallege the responses in the foregoing paragraphs  
12 1 through 79 above as though set forth in full.

13 81. Defendants deny the allegations in paragraph 81 of the FAC and aver that  
14 no response is required to the extent that the paragraph purports to state any conclusions  
15 of law.

16 82. Defendants deny the allegations in paragraph 82 of the FAC and aver that  
17 no response is required to the extent that the paragraph purports to state any conclusions  
18 of law.

19 83. Defendants deny the allegations in paragraph 83 of the FAC and aver that  
20 no response is required to the extent that the paragraph purports to state any conclusions  
21 of law.

22 84. Defendants deny the allegations in paragraph 84 of the FAC and aver that  
23 no response is required to the extent that the paragraph purports to state any conclusions  
24 of law.

25 85. Defendants deny the allegations in paragraph 85 of the FAC and aver that  
26 no response is required to the extent that the paragraph purports to state any conclusions  
27 of law.

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**Prayer for Relief**

Defendants deny that Plaintiffs are entitled to any relief requested in the “Prayer for Relief” and deny any allegations or claims set forth therein.

**DEFENSES**

Defendants assert the following defenses to Plaintiffs’ alleged causes of action. Insofar as any of the following constitutes a denial of an element of any claim alleged against the Defendants in this action, such denial does not indicate that Plaintiffs are relieved of their affirmative burden to prove each and every element of their claims. In addition, Defendants have not knowingly or intentionally waived any applicable defenses and reserve the right to assert and to rely upon any such other applicable defenses as may become available through discovery or otherwise.

**FIRST AFFIRMATIVE DEFENSE**

86. The FAC fails to state any claim upon which relief can be granted.

**SECOND AFFIRMATIVE DEFENSE**

87. Plaintiffs lack standing to bring the claims asserted in the FAC.

**THIRD AFFIRMATIVE DEFENSE**

88. Plaintiffs’ claims are barred by the doctrines of laches, waiver, and/or estoppel.

**FOURTH AFFIRMATIVE DEFENSE**

89. Plaintiffs’ claims fail because Defendants have not engaged in any type of infringement, and there is no actionable similarity between the works at issue.

**FIFTH AFFIRMATIVE DEFENSE**

90. Plaintiffs’ claims fail because any allegedly copied portions of the works at issue lie in the public domain.

**SIXTH AFFIRMATIVE DEFENSE**

91. Plaintiffs’ claims fail because any allegedly copied portions of the works at issue are neither original nor a protectable expression of an idea.

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**SEVENTH AFFIRMATIVE DEFENSE**

92. Plaintiffs’ claims are barred because the works at issue were independently created.

**EIGHTH AFFIRMATIVE DEFENSE**

93. Without admitting the alleged use of any original and protectible copyrighted material allegedly owned by Plaintiffs, which is denied, Plaintiffs’ claims fail because any such alleged use was *de minimis*.

**NINTH AFFIRMATIVE DEFENSE**

94. To the extent that Defendants are found to have engaged in infringement, which Defendants deny, Plaintiffs expressly or implicitly consented to or ratified the Defendants’ actions.

**TENTH AFFIRMATIVE DEFENSE**

95. Without admitting the alleged use of any original and protectible copyrighted material allegedly owned by Plaintiffs, which is denied, the conduct of which Plaintiffs complain constitutes fair use.

**ELEVENTH AFFIRMATIVE DEFENSE**

96. Without admitting any infringement, which is denied, any alleged infringement was innocent.

**TWELFTH AFFIRMATIVE DEFENSE**

97. Plaintiffs’ claims are barred in whole or in part by the applicable statute of limitations.

**THIRTEENTH AFFIRMATIVE DEFENSE**

98. To the extent that Defendants are found to have engaged in infringement, which Defendants deny, Plaintiffs are precluded from recovering statutory damages or attorneys’ fees based on their belated registration of the pertinent copyright registrations.

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**FOURTEENTH AFFIRMATIVE DEFENSE**

99. Plaintiffs’ claims are barred in whole or in part to the extent that Plaintiffs have failed to name necessary and/or indispensable parties.

**FIFTEENTH AFFIRMATIVE DEFENSE**

100. Plaintiffs’ claims are barred in whole or in part to the extent that Plaintiffs have sued the improper parties, defendants, or entities.

**SIXTEENTH AFFIRMATIVE DEFENSE**

101. Plaintiffs’ claims are barred to the extent that the alleged original drum pattern contained in Fish Market was authored by a drum machine and, thus, is ineligible for copyright protection.

**SEVENTEENTH AFFIRMATIVE DEFENSE**

102. Plaintiffs’ claims are barred to the extent that the alleged original drum pattern contained in Fish Market was authored by third-parties and is not an original work of authorship within the meaning of the United States Copyright Act.

**EIGHTEENTH AFFIRMATIVE DEFENSE**

103. Plaintiffs’ claims are barred in whole or in part to the extent that the Plaintiffs’ claims are based on alleged similarities to musical works, including *Ellos Benia* and *Pounder*, which Plaintiffs do not own.

**NINETEENTH AFFIRMATIVE DEFENSE**

104. Plaintiffs’ claims must be dismissed as against any of Defendants over which this Court lacks personal jurisdiction.

1           **WHEREFORE**, Defendants pray for judgment dismissing the FAC in its  
2 entirety, awarding Defendants their costs and attorneys' fees, and for such other and  
3 further relief as this Court deems just and proper.

4  
5   **PRYOR CASHMAN LLP**

6  
7     Dated: March 18, 2022           By    /s/ James G. Sammataro

8   James G. Sammataro  
9   jsammataro@pryorcashman.com

10   Attorneys for Defendants  
11   MAURICIO RENGIFO; ANDRÉS TORRES;  
12   UNIVERSAL MUSIC PUBLISHING, INC.;;  
13   UMG RECORDINGS, INC.; WARNER  
14   CHAPPELL MUSIC, INC.; JUAN CARLOS  
15   OZUNA ROSADO; LUIS ALFONSO  
16   RODRIGUEZ LOPEZ-CEPERO.

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**DEMAND FOR JURY TRIAL**

Defendants hereby demand a jury trial as provided by Rule 38(a) of the Federal Rules of Civil Procedure.

**PRYOR CASHMAN LLP**

Dated: March 18, 2022 By */s/ James G. Sammataro*

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*jsammataro@pryorcashman.com*

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