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10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 MELISSA FERRICK, individually and
13 doing business as Nine Two One Music
14 and Right On Records/Publishing, and
on behalf of all others similarly situated,

15 Plaintiff,

16 v.

17 SPOTIFY USA INC., a Delaware
18 corporation, and DOES 1 through 10,

19 Defendants.

Case No.

**CLASS ACTION COMPLAINT
FOR COPYRIGHT
INFRINGEMENT**

DEMAND FOR TRIAL BY JURY

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1 Plaintiff Melissa Ferrick individually and doing business as Nine Two One
2 Music and Right On Records/Publishing (“Plaintiff” or “Ferrick”), on behalf of
3 herself and all other similarly situated owners of federal copyrights in nondramatic
4 musical works (“musical compositions”) that were reproduced and distributed
5 without a license by Defendant Spotify USA Inc. (“Spotify” or “Defendant”) and
6 DOES 1-10 (collectively “Defendants”) during the last three years, alleges as
7 follows.

8 **NATURE OF THE ACTION**

9 1. Under the Copyright Act, there are two separate copyrights in every
10 recorded song: one in the sound recording (“phonorecord”) itself, 17 U.S.C.
11 §102(7), and one in the musical composition embodied in that phonorecord, 17
12 U.S.C. §102(2). This case is brought to vindicate the rights of the owners of the
13 copyrights in the musical compositions embodied in phonorecords that Spotify has
14 reproduced and distributed – without a license – as part of its extraordinarily popular
15 interactive online subscription music streaming service (the “Service”).

16 2. Spotify launched the Service in the United States on or about July 14,
17 2011. Since that time, the Service has grown to over 70 million subscribers, raised
18 close to \$1 billion in private equity, and obtained a valuation in excess of \$8 billion.
19 To achieve that success, Spotify promised its subscribers that it would provide them
20 with “[a]ll the music you’ll ever need...for every moment.” But Spotify knew that
21 in order to fulfill its promise, it would either have to delay the launch of the Service
22 (and its process for immediately ingesting and offering new music) until such time
23 as it had obtained all necessary licenses, or it would have to employ a now familiar
24 strategy for many digital music services – infringe now, apologize later.

25 3. Spotify chose expediency over licenses. Thus, while Spotify has
26 profited handsomely from the music that it sells to its subscribers, the owners of
27 that music (in particular, songwriters and their music publishers) have not been able
28 to share in that success because Spotify is using their music for free.

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1 4. The path that Spotify should have chosen is set forth in the Copyright
2 Act. A service like Spotify that is interested in reproducing and distributing musical
3 compositions in phonorecords has two choices: it can negotiate direct licenses with
4 the copyright owners of those musical compositions or it can pursue compulsory
5 licenses under 17 U.S.C. §115. Either a direct license or a compulsory license
6 would have permitted Spotify to make and distribute phonorecords embodying the
7 musical compositions as part of the Service, including by means of digital
8 phonorecord deliveries (“DPDs”), interactive streaming, and limited downloads.

9 5. While a license under 17 U.S.C. §115 is compulsory, it is not
10 automatic. To obtain such a license, it was Spotify’s obligation to send a notice to
11 each copyright owner “before or within thirty days after making, and before
12 distributing any phonorecords of the work” of its “intention” use the work. 17
13 U.S.C. §115(b)(1). This notice of intent (or, as it is commonly referred to, an
14 “NOI”) is not merely a ministerial formality; it is a critical first step in the
15 compulsory licensing process that alerts the copyright owner to the use of its
16 musical composition and, in turn, the right to be compensated for that use. Because
17 of its significance, the failure to timely serve or file an NOI “forecloses the
18 possibility of a compulsory license and, in the absence of a negotiated license,
19 renders the making and distribution of phonorecords actionable as acts of
20 infringement.” 17 U.S.C. §115(b)(2). Even after sending an NOI, Spotify was then
21 required to timely account to the copyright owner and pay royalties accordingly. 17
22 U.S.C. §115(c).

23 6. For the musical compositions that are at issue in this litigation, Spotify
24 did not negotiate direct licenses and did not avail itself of the compulsory licensing
25 procedures in the Copyright Act. Instead, Spotify chose a third path: it outsourced
26 its licensing and accounting obligations to the Harry Fox Agency (“HFA”), a music
27 publishing rights organization that was ill-equipped to obtain licenses for all of the
28 songs embodied in the phonorecords distributed by Spotify. As a result, neither

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1 Spotify nor HFA directly licensed or timely issued NOIs for many of the musical
2 compositions embodied in phonorecords that Spotify was reproducing and
3 distributing on a daily basis as part of the Service.

4 7. The known failure by Spotify to obtain licenses for all of the musical
5 compositions that it is exploiting caused it to recently announce that it “will invest in
6 the resources and technical expertise to build a comprehensive publishing
7 administration system to solve this problem.” *See* Ed Christman, “Spotify
8 Announces Database To Properly Manage Royalties,” *Billboard* (Dec. 23, 2015),
9 *available at* [http://www.billboard.com/articles/business/6820925/spotify-publishing-](http://www.billboard.com/articles/business/6820925/spotify-publishing-database-royalties)
10 [database-royalties](http://www.billboard.com/articles/business/6820925/spotify-publishing-database-royalties). That is an investment and process that Spotify should have
11 undertaken *before* it decided to reproduce and distribute phonorecords embodying
12 unlicensed musical compositions to the Service’s millions of users, not over four
13 years after Spotify launched the Service in the United States. At this point, Spotify's
14 failure to properly obtain licenses is much more than what it euphemistically
15 describes as an “administration system” problem; it is systemic and willful
16 copyright infringement for which actual and statutory damages are the remedy.
17 Therefore, Plaintiff brings this class action for copyright infringement on behalf of
18 herself and all similarly situated owners of musical compositions that were
19 reproduced and distributed by Defendants without a license during the last three
20 years.

21 THE PARTIES

22 8. Plaintiff Melissa Ferrick, a resident of Newburyport, Massachusetts, is
23 a nationally recognized singer-songwriter who has released seventeen albums over
24 the past two decades, with a catalog of over one hundred and fifty copyrighted
25 musical compositions. Ferrick is an eight-time Boston Music Award winner and is
26 regarded as one of the most prolific songwriters of her generation. She tours
27 regularly throughout North America and has shared the stage with Morrissey, Marc
28 Cohn, Paul Westerberg, Dwight Yoakam, John Hiatt, Weezer, Tegan and Sara, Bob

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1 Dylan, Ani DiFranco, k.d. Lang, Suzanne Vega, Joan Armatrading, and many
2 others. Ferrick signed in the early 1990s with Atlantic Records, and in 1993
3 released her debut album, “Massive Blur,” which was then followed by “Willing to
4 Wait” in 1995. Critical acclaim for Ferrick’s music has continued to this day.
5 Ferrick’s 2011 album “Still Right Here” debuted on Billboard’s Heat-Seekers
6 Album Chart, won an 8th annual International Acoustic Music Award, and garnered
7 two Independent Music Award nominations. Her 2013 album, “The Truth Is,” won
8 the 2014 Independent Music Award for Alt-Country Album of the Year and her
9 2015 self-titled album was referred to by the Boston Globe as “one of the year’s
10 most singular albums.” Ferrick has been a part time Associate Professor in the
11 Songwriting Department at Berklee College of Music since 2013, and the Artistic
12 Director for Berklee’s Five Week Summer Program since 2009. Her songs have
13 been streamed approximately one million times by Spotify without a license.

14 9. Spotify is a Delaware corporation with its principal place of business in
15 New York, New York. Spotify owns and operates the Service – an online
16 interactive music streaming service, which can be principally accessed at
17 www.spotify.com. The Service consists of both an advertisement-supported service
18 that is free to subscribers and a premium service that costs \$9.99 per month and is
19 advertisement-free. Spotify is qualified to do business in State of California, and is
20 doing business in California with offices in Los Angeles and San Francisco. Spotify
21 operates the Service in California, has millions of subscribers and end users in
22 California, has entered into contracts and other transactions in California (including
23 with record labels, publishers and developers), and generates millions of dollars in
24 revenue from California residents.

25 10. The true names and capacities (whether individual, corporate, associate
26 or otherwise) of the defendants named herein as Does 1 through 10, inclusive, are
27 unknown to Plaintiff, who therefore sues said defendants by such fictitious names.
28 Plaintiff will amend this Complaint to allege their true names and capacities when

1 such have been ascertained. Upon information and belief, each of the Doe
2 defendants herein is responsible in some manner for the occurrences herein alleged,
3 and Plaintiff's and class members' injuries as herein alleged were proximately
4 caused by such defendants' acts or omissions.

5 11. Plaintiff is informed and believes, and on that basis alleges, that at all
6 times mentioned in this Complaint, Spotify and each of the Doe defendants were the
7 agent of each other and, in doing the things alleged in this Complaint, were acting
8 within the course and scope of such agency.

9 **JURISDICTION AND VENUE**

10 12. This is a civil action seeking damages and injunctive relief for
11 copyright infringement under the Copyright Act, 17 U.S.C. §101 *et seq.*

12 13. This Court has original subject matter jurisdiction of this action
13 pursuant to 28 U.S.C. §§1331 and 1338(a).

14 14. This Court has personal jurisdiction over Defendants because, among
15 other things, they do continuous and systematic business in California and in this
16 District and maintain one or more offices and employ personnel in California.
17 Defendants have also committed acts of copyright infringement in California and
18 have performed acts directed at and causing harm in California.

19 15. Venue is proper in this District pursuant to 28 U.S.C. §§1391(b) and (c)
20 and 1400(a) because Spotify is subject to personal jurisdiction in this District and
21 because a substantial part of the events or omissions by Spotify giving rise to the
22 claims occurred in this District.

23 **CLASS ALLEGATIONS**

24 16. Plaintiff brings this action as a class action pursuant to Fed. R. Civ.
25 Proc. 23 on behalf of herself and on behalf of a class of similarly situated copyright
26 owners of musical compositions defined as:

27 All persons or entities who own the copyright in a musical
28 composition: (a) for which a certificate of registration has been

1 issued or applied for; and (b) that was reproduced and distributed
2 through interactive streaming and/or limited downloads by
3 Defendants without a license during the last three years.

4 17. This action has been brought and may be properly maintained as a class
5 action because there is a well-defined community of interest in the litigation and the
6 members of the proposed class are readily and easily ascertainable and identifiable.

7 18. The member of the class are so numerous that joinder of all members is
8 impracticable. Plaintiff is informed and believes, and on that basis alleges, that
9 there are thousands of members in the class who can be readily located, identified
10 from various databases and records (including those maintained by Spotify, the
11 United States Copyright Office, and HFA) and through discovery, and notified of
12 this action.

13 19. Plaintiff's claim for copyright infringement is typical of the claims of
14 the members of the class, and Plaintiff's interests are consistent with and not
15 antagonistic to those of the other members of the class she seeks to represent.
16 Plaintiff and all members of the class have sustained damages and face irreparable
17 harm arising out of Defendants' continued infringement as alleged herein and, thus,
18 are entitled to recover actual damages and/or statutory damages and obtain
19 injunctive relief to prevent further wrongful conduct by Defendants.

20 20. Plaintiff has no interests that are adverse to, or which conflict with, the
21 interests of the absent members of the class and she is able to fairly and adequately
22 represent and protect the interests of such a class. Plaintiff believes strongly in the
23 protection of the copyrights of songwriters and music publishers. Plaintiff has
24 raised a viable claim for copyright infringement of the type reasonably expected to
25 be raised by members of the class, and will diligently and vigorously pursue that
26 claim. If necessary, Plaintiff may seek leave of the Court to amend this Complaint
27 to include additional class representatives to represent the class or additional claims
28

1 as may be appropriate. Plaintiff is represented by experienced, qualified, and
2 competent counsel who is committed to prosecuting this action.

3 21. Common questions of fact and law exist as to all members of the class
4 that plainly predominate over any questions affecting only individual members of
5 the class. These common legal and factual questions, which do not vary from class
6 member to class member, and which may be determined without reference to the
7 individual circumstances of any class member, include (without limitation) the
8 following:

9 (A) Whether Defendants' reproduced and distributed musical
10 compositions through interactive streaming and/or limited downloads without
11 a license during the last three years;

12 (B) Whether Defendants' reproduction and distribution of musical
13 compositions through interactive streaming and/or limited downloads without
14 a license constitutes direct infringement in violation of the Copyright Act, 17
15 U.S.C. §101 *et seq.*;

16 (C) Whether Defendants' acted willfully with respect to the acts
17 complained of herein;

18 (D) The basis and method for determining and computing damages,
19 including statutory damages; and

20 (E) Whether Defendants' infringing conduct is continuing, thereby
21 entitling the members of the class to injunctive or other relief.

22 22. A class action is superior to other available methods for the fair and
23 efficient adjudication of this controversy because individual litigation of the claims
24 of all class members is impracticable. The claims of the individual members of the
25 class may range from smaller sums to larger sums. Thus, for those class members
26 with smaller claims, the expense and burden of individual litigation may not justify
27 pursuing the claims individually. And even if every member of the class could
28 afford to pursue individual litigation, the court system could not be so encumbered.

1 It would be unduly burdensome to those courts in which individual litigation of
2 numerous cases would otherwise proceed. Individualized litigation would also
3 present the potential for varying, inconsistent, or contradictory judgments and would
4 magnify the delay and expense to all parties and to the court system resulting from
5 multiple trials of the same factual issues. By contrast, the maintenance of this action
6 as a class action presents few management difficulties, conserves the resources of
7 the parties and court system, and protects the rights of each member of the class.
8 Plaintiff anticipates no difficulty in the management of this action as a class action.

9
10 **CLAIM FOR RELIEF**

11 **(Copyright Infringement – Against All Defendants)**

12 23. Plaintiff hereby incorporates the allegations set forth above in
13 paragraphs 1 through 20 above, as though fully set forth herein.

14 24. Under §106 of the Copyright Act, the copyright owner of a musical
15 composition has the exclusive rights to reproduce and distribute the compositions in
16 phonorecords. 17 U.S.C. §106(1) and (3). This includes the exclusive rights to
17 make or authorize DPDs, interactive streams, and limited downloads of the musical
18 compositions through subscription or non-subscription online digital music services.
19 *See* 17 U.S.C. §115(d), 37 C.F.R. §§385.10, 385.11.

20 25. Spotify’s online interactive music streaming service, www.spotify.com,
21 is offered to end users in the United States on an advertising-free paid subscription
22 basis or an advertiser-supported no-subscription basis. Spotify distributes
23 phonorecords embodying musical compositions to its end users through interactive
24 streaming and limited downloads available on their computers and mobile devices.
25 Plaintiff is further informed and believes, and on that basis alleges, that Spotify also
26 makes server copies in the United States of phonorecords embodying the musical
27 compositions at issue in this litigation.

28 26. In order to lawfully make and distribute phonorecords embodying the
musical compositions as set forth above, Spotify must have first obtained not only a

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1 license for each individual phonorecord from its owner(s), but also a separate
2 license for the underlying musical composition that is embodied in each separate
3 phonorecord from the copyright owner of such composition. Spotify can either
4 license musical compositions directly or by obtaining a compulsory license in
5 accordance with the terms of 17 U.S.C. §115 by serving a timely NOI. Failure to
6 serve or file the requisite NOI “within thirty days after making, and before
7 distributing any phonorecords of the work...forecloses the possibility of a
8 compulsory license and, in the absence of a voluntary license, renders the making
9 and distribution of phonorecords actionable as acts of copyright infringement.” 17
10 U.S.C. §115(b)(1) and (2).

11 27. Spotify did not have and does not have a comprehensive system of
12 music publishing administration in place necessary to license all of the songs
13 embodied in phonorecords which it ingests and distributes by means of interactive
14 streaming and temporary downloads. Rather than decline to distribute phonorecords
15 embodying musical compositions that are unlicensed, however, Spotify elected
16 instead to engage in wholesale copyright infringement.

17 28. Plaintiff is the registered copyright owner of all of the musical
18 compositions listed on Exhibit A attached hereto and incorporated herein by this
19 reference (“Plaintiff’s musical compositions”). Plaintiff’s musical compositions
20 have been distributed through interactive streaming and temporary downloads by
21 Spotify approximately one million times within the last three years. Plaintiff is
22 further informed and believes, and on that basis alleges, that server copies thereof
23 have also been made by Spotify within the last three years. Plaintiff’s musical
24 compositions have not been licensed by Spotify either directly or by a compulsory
25 license in accordance with 17 U.S.C. §115.

26 29. Plaintiff is further informed and believes, and on that basis alleges, that
27 the musical compositions owned by the members of the class have been distributed
28 by Spotify through interactive streaming and temporary downloads and that Spotify

1 has also made server copies thereof during the last three years, all without either a
2 direct or compulsory license.

3 30. Spotify's unlawful reproduction and distribution of the musical
4 compositions owned by Plaintiff and the members of the class as alleged
5 hereinabove constitutes copyright infringement under the Copyright Act. 17 U.S.C.
6 §101 *et seq.*

7 31. Spotify's acts of infringement have been willful, intentional, and
8 purposeful, in disregard of and indifference to the rights of Plaintiff and the
9 members of the class.

10 32. As a direct and proximate result of Defendants' infringements of
11 Plaintiff's copyrights and the copyrights of the members of the class, pursuant to 17
12 U.S.C. §504(c), Plaintiff and the class members are entitled to recover up to
13 \$150,000 in statutory damages for each musical composition infringed.
14 Alternatively, at their election, pursuant to 17 U.S.C. §504(b), Plaintiff and the class
15 members are entitled to their actual damages, including Spotify's profits from
16 infringement, as will be proven at trial.

17 33. Plaintiff and the class members are also entitled to recover attorney's
18 fees and costs pursuant to 17 U.S.C. §505, and prejudgment interest according to
19 law.

20 34. Spotify is causing, and unless enjoined by the Court will continue to
21 cause, Plaintiff and the class members irreparable harm for which they have no
22 adequate remedy at law. Plaintiff and the class members are entitled to an
23 injunction under 17 U.S.C. §502 prohibiting the continued infringement of their
24 musical compositions.

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PRAYER FOR RELIEF

WHEREFORE, Plaintiff, on behalf of herself and on behalf of all other members of the class, prays for Judgment against Spotify and the Doe Defendants, and each of them, as follows:

A. Determining that this is a proper class action maintainable pursuant to Rule 23 of the Federal Rules Civil Procedure, certifying Plaintiff as class representative and Plaintiff’s counsel as class counsel;

B. For compensatory and/or statutory damages in an amount in excess of \$200 million, according to proof;

C. A temporary, preliminary, and permanent injunction enjoining and restraining Defendants, and their respective agents, servants, directors, officers, principals, employees, representatives, subsidiaries and affiliated companies, successors, assigns, and those acting in concert with them or at their direction, and each of them, from continued unlicensed reproduction and distribution of the copyrighted musical compositions owned by Plaintiff and the members of the class;

D. For pre- and post-judgment interest.

E. For such fees and costs (including reasonable attorney’s fees) incurred herein as permitted by law.

F. For such other and further relief as the Court deems just and proper.

DATED: January 8, 2016

GRADSTEIN & MARZANO, P.C.
Henry Gradstein
Maryann R. Marzano
Harvey W. Geller
Daniel Lifschitz

By: /s/ Henry Gradstein
Henry Gradstein
Attorneys for Plaintiff

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DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury of the claim alleged in this Complaint.

DATED: January 8, 2016

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Harvey W. Geller
Daniel Lifschitz

By: /s/ Henry Gradstein

Henry Gradstein
Attorneys for Plaintiff

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EXHIBIT A

Melissa Ferrick – Copyright Registrations

<u>COMPOSITION</u>	<u>REGISTRATION NO.</u>
Aida	PA0000846013
All For Me	PA0001213408
Alone	PA0000846013
Anchor Up	SR1-2923879852 (PENDING)
Anything Anywhere	PAu002857415
Asking For Love	PA0000846013
Back In Love	PA0001213408
Bad Bad Girl	PAu002857415
Beijing	PAu002857415
Blind Side	PA0000996607
Blue Sky Night	PA0000848484
Break Up Song	PA0001213409
Breaking Vows	PA0000848484
Burn This Guitar	PA0001213408
Careful	SR1-2923879852 (PENDING)
Checking In	PAu003560073
Closer	PA0001669452
Come On Life	PA0001669452
Crack The Mirror	PA0001213409
Cracker Jack Kid	PA0000846170
Do It Over	PAu002339071
Don't Say Goodbye	PAu002323653
Drive	PA0000996607
E-Mail	PA0001213409
Easy	PA0001669452
Elephant	SR1-2923879852 (PENDING)
Every Three Words	PAu002857415
Everything I Need	PAu002323653
Everything You Get	PA0001669452
Everything You Were	PA0001861438
Faking	PA0000846170
Falling On Fists	PA0000846170
Favorite Person In The World	PA0000849237
Fear And Time	PAu002323653
Fearless	PAu002857415
Fighting Chance	PA0001213408

For Once In My Life	PA0000848484
Freedom	PA0000996607
Frog Named Freddy	PA0000846013
Go Easy On Me	PA0001861438
Gotta Go Now	PA0000846170
Happy Song	PA0000848484
Headphones On	PAu003560073
Hello Dad	PA0000848484
Heredity	PA0000849237
Hold On	PA0000996608
Home	PA0001861438
Honest Eyes	PA0000848484
I Am Done	PA0000846170
I Am Not	PA0000846170
I Don't Want You To Change	PA0001861437
I Give Up	PAu002857415
I Like it That Way	PAu002323653
I Still Love You	PA0001213409
I Will Arrive	PAu002339071
I Will Back You Up	PAu003560073
In A World Like This	PA0000848484
Inside	PA0001669452
It's Alright	PAu002323653
It's Been A Long Time	PA0001669452
Let Me Go	PA0000849237
Let's Fly	PA0001213408
Little Love	PA0000996607
Love Ain't Afraid	PA0001861438
Love Song	PA0000848484
Marie in the Middle	PA0001213408
Massive Blur	PA0000848484
Mercy	PA0001213409
Nebraska	PAu002857415
Never Give Up	PA0001669452
North Carolina	PA0000996607
One Night Stand	PA0001213409
One Of A Kind	PAu003560073
One Year	PA0001669452
Overboard	PA0001861438
Particular Place To Be	PAu002323653

Pity Song	PA0001861438
Relief	SR1-2923879852 (PENDING)
Rest Now	PA0001669452
Run Out Of Me	SR1-2923879852 (PENDING)
Say Yes	SR1-2923879852 (PENDING)
Scenic View	SR1-2923879852 (PENDING)
Seconds Like These	PAu003560073
Selfish Side	PA0001213408
Shatter Me	PA0001213408
Sideways	SR1-2923879852 (PENDING)
Singing With The Wind	PAu003560073
Sky Above	PA0001213409
Some Kinda Nerve	PA0000996607
Somebody Help Me	PA0000846013
Somehow We Get There	PA0000846170
Stand Still	PAu002339071
Stars Outnumber Our Hearts	SR1-2923879852 (PENDING)
Still Right Here	PAu003560073
Streetlight	PAu002857415
Stuck	PA0001669452
Take In All The Plants	PA0001861438
Take Me All	PA0000848484
Taken A Liking	PA0000846013
Ten Friends	PA0000848484
The Meaning Of Love	PA0000848484
The Other Side	PAu002857415
The Stranger	PA0000996607
The Truth Is	PA0001861438
Then So It Is	PA0000996608
Thinking	PA0001213408
This Is Love	PA0000996607
This Time Of Year	PAu003560073
Til You're Dead	PA0000846170
Time Flies	PA0000846170
Time To Leave	PA0001861438
To Feel Real	PA0001213409
To Let You See Me	PA0000846013
Trouble In My Head	PA0000846170
Trust It All	SR1-2923879852 (PENDING)
Weightless And Slow	PAu003560073

Welcome To My Life	PA0001213409
Westbound	PAu002857415
What Have I Got To Lose	PA0000848484
When You Left	PA0000846170
Who Knows Why	PA0001213409
Will You Be The One	PA0001213409
Willing To Wait	PA0000846170
Win 'Em Over	PA0000996608
Wonder Why	PA0000848484
Wreck Me	PA0001861438
You	PA0001213408
You Let Me Be	PAu003560073
You've Known It All Along	PA0000849237