

1 KINSELLA WEITZMAN ISER KUMP & ALDISERT LLP
 LAWRENCE Y. ISER (SBN 094611)
 2 liser@kwikalaw.com
 JONATHAN STEINSAPIR (SBN 226281)
 3 jsteinsapir@kwikalaw.com
 GREGORY S. GABRIEL (SBN 239902)
 4 ggabriel@kwikalaw.com
 808 Wilshire Boulevard, 3rd Floor
 5 Santa Monica, California 90401
 Telephone: 310.566.9800
 6 Facsimile: 310.566.9850

7 Attorneys for Plaintiff Jackson Browne

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**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA
 WESTERN DIVISION**

JACKSON BROWNE, an individual
 Plaintiff,
 vs.
 JOHN MCCAIN, an individual; THE
 REPUBLICAN NATIONAL
 COMMITTEE, a non-profit political
 organization; THE OHIO
 REPUBLICAN PARTY; a non-profit
 political organization
 Defendants.

Case No. CV 08-05334 RGK (Ex)
 Hon. R. Gary Klausner, presiding

**JOINT STIPULATION TO
 CONTINUE HEARING AND SET
 BRIEFING SCHEDULE ON
 MOTIONS FILED BY
 DEFENDANTS**
**[Proposed Order Submitted
 Concurrently Herewith]**

KINSELLA WEITZMAN ISER KUMP & ALDISERT LLP
 808 WILSHIRE BOULEVARD, 3RD FLOOR
 SANTA MONICA, CALIFORNIA 90401
 TEL 310.566.9800 • FAX 310.566.9850

1 Plaintiff Jackson Browne (“Plaintiff”), by and through his counsel of record,
2 and Defendants John McCain, the Ohio Republican Party (“ORP”), and Republican
3 National Committee (“RNC”) (collectively, “Defendants”), by and through their
4 respective counsel of record, hereby stipulate as follows:

5 WHEREAS, on November 17, 2008, Senator McCain filed a Special Motion
6 to Strike Pursuant to California Code of Civil Procedure (“CCP”) § 425.16 and a
7 Motion to Dismiss Pursuant to Federal Rule of Civil Procedure (“FRCP”) 12(b)(6),
8 which are currently set for hearing on December 8, 2008;

9 WHEREAS, on November 17, 2008, the ORP filed a Motion to Dismiss
10 Pursuant to FRCP 12(b)(2), (3) & (6); or Transfer Pursuant to 28 U.S.C. §§ 1404(a)
11 & 1406(a); and a Motion to Strike pursuant to CCP § 425.16, which are currently set
12 for hearing on December 8, 2008;

13 WHEREAS, on November 17, 2008, the RNC filed a Special Motion to
14 Strike Pursuant to CCP § 425.16 and a Motion to Dismiss Pursuant to FRCP
15 12(b)(6), which are currently set for hearing on December 8, 2008;

16 WHEREAS, the six motions filed by Defendants raise complex issues
17 regarding the law of Copyright, Trademark, and Right of Publicity including, *inter*
18 *alia*, the extent to which the First Amendment precludes such claims in whole or in
19 part, the extent of fair use under the copyright law in this context, whether the
20 Lanham Act applies to political advertising, and the scope of this Court’s
21 jurisdiction over one or more Defendants and whether this is an appropriate and
22 convenient venue for this action;

23 WHEREAS, due to the number of motions filed by Defendants and the
24 complex issues raised therein, it will benefit the Court and the parties if Plaintiff has
25 more than one week to oppose Defendants’ motions and if Defendants have more
26 than one week to respond to Plaintiff’s oppositions to the motions;

27 WHEREAS, for the convenience of the Court and its staff, the parties desire
28 to provide the Court with more than one week to prepare for the hearing on

1 Defendants' motions;

2 WHEREAS, due to the upcoming holidays in December and January and
3 previous obligations of the parties' attorneys, all parties are unable to attend a
4 hearing on Defendants' motions until February 2, 2009;

5 WHEREAS, the parties have made no prior request for a continuance of the
6 hearing date in connection with these motions;

7 IT IS HEREBY STIPULATED, and the parties respectfully request that the
8 Court Order, that all of Defendants' motions shall be set for hearing on February 2,
9 2009, and that Plaintiff's oppositions to the motions shall be filed and served no
10 later than January 7, 2009 and Defendants' replies shall be filed and served no later
11 than January 21, 2009; and

12 IT IS FURTHER STIPULATED that no party shall argue or assert that this
13 continuance of the hearing date on the CCP § 425.16 Motions shall violate or
14 conflict with the provisions of CCP § 425.16(f), and the parties respectfully request
15 that the Court so find.

16 A proposed order is lodged concurrently herewith.

17
18 DATED: November 19, 2008

KINSELLA WEITZMAN ISER KUMP &
ALDISERT LLP

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21 By: /s/Jonathan P. Steinsapir

Jonathan P. Steinsapir

Attorneys for Jackson Browne

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1 Dated: November 19, 2008

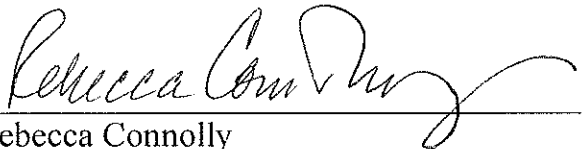
SPILLANE SHAEFFER ARONOFF BANDLOW LLP

2
3
4 By: 
Lincoln D. Bandlow

5 Attorneys for Defendant
6 JOHN MCCAIN
7

8 DATED: November 19, 2008

GRUNSKY, EBEY, FARRAR & HOWELL

9
10 By: 
11 Rebecca Connolly
12 Attorneys for the Ohio Republican Party

13 DATED: November 19, 2008

KLEIN, O'NEILL & SINGH, LLP

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15 By: _____
16 Howard Klein
17 Attorneys for the Republican National
18 Committee
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DATED: November 19, 2008

SPILLANE SHAEFFER ARONOFF
BANDLOW LLP

By: _____
Lincoln Bandlow
Attorneys for John McCain

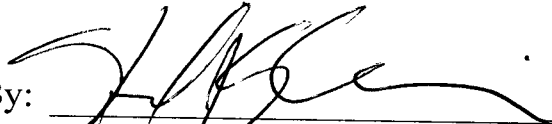
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GRUNSKY, EBNEY, FARRAR & HOWELL

By: _____
Rebecca Connolly
Attorneys for the Ohio Republican Party

DATED: November 19, 2008

KLEIN, O'NEILL & SINGH, LLP

By:  _____
Howard Klein
Attorneys for the Republican National
Committee