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6 Attorneys for Plaintiff GEORGE CLINTON

7  
8 UNITED STATES DISTRICT COURT  
9 CENTRAL DISTRICT OF CALIFORNIA

10 GEORGE CLINTON, an  
11 individual,

12 Plaintiff,

13 v.

14 WILL ADAMS, p/k/a will,I,am  
15 individually and d/b/a will.i.am  
16 music publishing , et al.,

17 Defendants.

Case No. CV 10-09476-ODW-PLA

The Honorable Otis D. Wright II

**STIPULATION FOR (1) 30 DAY  
EXTENSION OF DATES IN  
SCHEDULING AND CASE  
MANAGEMENT ORDER AND (2) 30  
DAY STAY OF DISCOVERY**

Action Filed: December 10, 2010

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19  
20 WHEREAS, on September 28, 2011, the Court granted the requested stay of  
21 discovery between the Plaintiff, and other certain Defendants, to allow those parties to  
22 engage in the voluntary exchange, disclosure, and dissemination of documents and  
23 information agreed to by the parties for the purpose of good faith settlement  
24 discussions; and

25  
26 WHEREAS, voluntary exchanges and dissemination of information (including  
27 certain financial documents relating to sales of the allegedly infringing song at issue);  
28

1           WHEREAS, the voluntary exchanges have lead to the potential voluntary  
2 dismissal of certain of the Defendants (which stipulation for dismissal is currently  
3 being circulated) and

4           WHEREAS, Plaintiff maintains that in order to make a good faith settlement  
5 demand, Plaintiff must retain an economic expert to analyze the financial documents  
6 provided for settlement purposes; and

7           WHEREAS, Plaintiff maintains that his current economic condition has  
8 prevented him from retaining such expert though he has taken all reasonable steps to  
9 obtain the monies to do so; and

10           WHEREAS, Plaintiff maintains that he will be able to obtain funds to hire such  
11 expert within 30 days either (a) through his pending motion to release certain levies  
12 placed upon the Plaintiff's financial resources in Case No. 10-09921, also before the  
13 U.S. District Court for the Central District of California; and/or (b) from revenues  
14 earned from a musical tour Plaintiff is currently undertaking in Europe; and

15           WHEREAS, the case is more likely to be resolved if Defendants do not have to  
16 spend monies preparing expert reports and preparing motions for summary judgment;  
17 and

18           WHEREAS, the parties have made no previous request to continue the trial, pre-  
19 trial conference, or other scheduled dates;

20           THEREFORE, IT IS HEREBY STIPULATED by and between the parties who  
21 have appeared in this action by and through their respective counsel of record and  
22 pursuant to the Federal Rules of Civil Procedure, Local Rules of the Central District of  
23 California, and the Court's Scheduling and Case Management Order that:

24           (1) Each of the dates contained on the last page of the Scheduling and Case  
25 Management Order (with the exception of the last date to amend pleadings or add  
26 parties) shall be extended for approximately 30 days, subject to the Court's  
27 availability.  
28

1 (2) All discovery is stayed for 30 days from the date of this order (except that  
2 the deposition of Eban Kelly may proceed during this time period).

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4 Jeffrey P. Thennisch  
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s/Allen B.Grotsky(with consent)  
Allen B. Grotsky (SBN 111064)  
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Music Publishing Company, Inc.  
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11  
12 November 30, 2011

November 30, 2011

13 s/ Linda M. Burrow (with consent)  
14 Linda M. Burrow  
15 Attorney for Defendant  
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s/Kara E.F. Cenar (with consent)  
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