

EXHIBIT A

Defendants' Privilege Log (May 9, 2014)

Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
1	5/28/1991	Research report regarding "Happy Birthday to You" prepared at direction of counsel	Nancy H. McAleer (Thompson & Thompson)	Ed Arrow (Copyright Department, Warner/Chappell Music, Inc.)		AC, WP
2	5/28/1991	Research report regarding "Happy Birthday to You" prepared at direction of counsel	Nancy H. McAleer (Thompson & Thompson)	Ed Arrow (Copyright Department, Warner/Chappell Music, Inc.)		AC, WP
3	11/17/1988	Inter office memo reflecting legal advice regarding Birch Tree Group Ltd.	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	Leslie E. Bider (President & CEO, Warner/Chappell Music, Inc.)	Jay R. Morgenstern (Executive Vice President and General Manager, Warner/Chappell Music, Inc.); Ira Pianko (Chief Financial Officer, Warner/Chappell Music, Inc.)	AC
4	11/1/2002	Fax from parent of exclusive UK subpublisher of "Happy Birthday to You" reflecting legal advice and reflecting request for legal advice regarding "Happy Birthday to You"; handwritten notes of Ed Pierson reflecting legal advice regarding the same	Chris Milesen (Director of Legal & Business Affairs, EMI Music Publishing United Kingdom)	Ed Pierson, Esq. (General Counsel, Warner/Chappell Music, Inc.)		AC
5	1/6/2003	Confirmation Report of fax from parent of exclusive UK subpublisher of "Happy Birthday to You" reflecting legal advice and reflecting request for legal advice regarding "Happy Birthday to You"; handwritten notes of Ed Pierson reflecting legal advice regarding the same	Chris Milesen (Director of Legal & Business Affairs, EMI Music Publishing United Kingdom)	Ed Pierson, Esq. (General Counsel, Warner/Chappell Music, Inc.)		AC
6	9/16/2004	Fax message reflecting legal advice and reflecting request for legal advice regarding "Happy Birthday to You"	Claes Hennig (Warner/Chappell Music Scandinavia AB)	Jeremy Blietz (Warner/Chappell Music, Inc.)		AC

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Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
7	1/21/2003	Memorandum reflecting response to request for legal advice regarding "Happy Birthday to You"	Brandon Schott (Assistant to the VP of Copyright, Warner/Chappell Music, Inc.)	Ed Pierson, Esq. (General Counsel, Warner/Chappell Music, Inc.)	Merlene Travis (Head of Administration, Warner/Chappell Music, Inc.)	AC
8	11/1/2002	Fax from parent of exclusive UK subpublisher of "Happy Birthday to You" reflecting legal advice and reflecting request for legal advice regarding "Happy Birthday to You"; handwritten notes of Ed Pierson, Esq., reflecting legal advice regarding the same	Chris Milesen (Director of Legal & Business Affairs, EMI Music Publishing United Kingdom)	Ed Pierson, Esq. (General Counsel, Warner/Chappell Music, Inc.)		AC
9	2/21/2001	Memorandum from print agent reflecting legal advice regarding "Happy Birthday to You"	Teveya Dovbish, Esq. (Alfred Publishing Co., Inc.)	Ed Pierson, Esq. (General Counsel, Warner/Chappell Music, Inc.)	Guy Blake, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell)	AC
10	12/12/1949	Letter from exclusive UK subpublisher of "Happy Birthday to You" reflecting legal advice and reflecting request for legal advice regarding "Happy Birthday to You"	S. Van Lier (General Manager, Publishing Department, Keith Prowse & Co., Ltd.)	A. H. Foster, Esq. (Clayton F. Summy Co.)		AC
11	11/13/1958	Letter from exclusive UK subpublisher of "Happy Birthday to You" to UK performing rights society reflecting legal advice and reflecting request for legal advice regarding issues related to "Happy Birthday to You" copyright under UK law	P. A. Howgill, Esq. (Administrative Manager, Keith Prowse Music Publishing Co. Ltd.)	R. F. Whale (Secretary, The Performing Right Society Ltd.)		AC
12	11/5/1958	Letter from UK performing rights society to exclusive UK subpublisher of "Happy Birthday to You" reflecting legal advice and reflecting request for legal advice regarding issues related to "Happy Birthday to You" copyright under UK law	R. F. Whale (Secretary, The Performing Right Society Ltd.)	Keith Prowse Music Publishing Co. Ltd.		AC
13	10/12/1965	Letter from French performing rights society to its parent organization reflecting legal advice regarding issues related to "Happy Birthday to You" copyright under French law	S.A.C.E.M.	S.D.R.M		AC

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Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
14	11/29/1965	Letter from counsel for exclusive UK subpublisher of "Happy Birthday to You" to employee of said subpublisher reflecting legal advice regarding issues related to "Happy Birthday to You" copyright	P. A. Howgill, Esq. (Administrative Manager, Keith Prowse Music Publishing Co. Ltd.)	Keith Morgan (Keith Prowse Music Publishing Co. Ltd.)		AC
15	12/29/1988	Inter office memo reflecting response to request for legal advice regarding US trademark search	Cindy E. Nelson (Warner Communications, Inc.)	Fred Wistow, Esq. (Assistant Counsel, Warner Communications, Inc.)	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.); Marie White (Legal Department, Warner Communications, Inc.); Louise E. Dembeck, Esq. (Chief Intellectual Property Counsel, Time Warner, Inc.)	AC

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Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
16	11/30/1988	Letter reflecting legal advice regarding acquisition of Birch Tree Group Ltd.	Leslie E. Bider (President & CEO, Warner/Chappell Music, Inc.)	Joan T. Pincus (Warner Communications Inc.)	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.); Fred Wistow, Esq. (Assistant Counsel, Warner Communications, Inc.); Ira Pianko (Chief Financial Officer, Warner/Chappell Music, Inc.)	AC
17	11/18/1988	Inter office memo reflecting legal advice regarding Birch Tree Group Ltd. and "Happy Birthday to You"	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	Leslie E. Bider (President & CEO, Warner/Chappell Music, Inc.)	Jay R. Morgenstern (Executive Vice President and General Manager, Warner/Chappell Music, Inc.); Ira Pianko (Chief Financial Officer, Warner/Chappell Music, Inc.)	AC

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Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
18	11/17/1988	Inter office memo reflecting legal advice regarding Birch Tree Group Ltd.	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	Leslie E. Bider (President & CEO, Warner/Chappell Music, Inc.)	Jay R. Morgenstern (President, Warner Bros. Publications, Inc.); Ira Pianko (Chief Financial Officer, Warner/Chappell Music, Inc.)	AC
19	11/16/1988	Handwritten notes of Don Biederman reflecting legal advice regarding Birch Tree Group Ltd.	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)			AC
20	1/3/1989	Letter reflecting legal advice regarding Birch Tree Group Ltd.	Paul, Weiss, Rifkind, Wharton & Garrison	Warner/Chappell Music, Inc.		AC
21	3/3/1989	Handwritten notes of Don Biederman, Esq. (undated); correspondence between Don Biederman, Esq. and Audrey Spolder (Senior Director, Contract Administration, Warner/Chappell Music, Inc.) reflecting legal advice and reflecting request for legal advice regarding Birch Tree Group Ltd. subpublishing agreements (dated 3/3/1989)	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)			AC

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Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
22	11/17/1988	Inter office memo reflecting legal advice regarding Birch Tree Group Ltd.	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	Leslie E. Bider (President & CEO, Warner/Chappell Music, Inc.)	Jay R. Morgenstern (Executive Vice President and General Manager, Warner/Chappell Music, Inc.); Ira Pianko (Chief Financial Officer, Warner/Chappell Music, Inc.)	AC
23	12/30/1988	Fax cover sheet reflecting request for legal advice regarding Birch Tree Group Ltd.	Fred Wistow, Esq. (Assistant Counsel, Warner Communications, Inc.)	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)		AC
24	12/29/1988	Letter reflecting legal advice regarding Birch Tree Group Ltd.	Robert G. Shepherd, Esq. (Matthews, Woodbridge, Goebel, Pugh & Collins, P.C.)	Fred Wistow, Esq. (Assistant Counsel, Warner Communications, Inc.)		AC
25	12/29/1988	Enclosure to letter reflecting legal advice regarding Birch Tree Group Ltd.	Robert G. Shepherd, Esq. (Matthews, Woodbridge, Goebel, Pugh & Collins, P.C.)	Fred Wistow, Esq. (Assistant Counsel, Warner Communications, Inc.)		AC

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Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
26	12/29/1988	Enclosure to letter reflecting legal advice regarding Birch Tree Group Ltd.	Robert G. Shepherd, Esq. (Matthews, Woodbridge, Goebel, Pugh & Collins, P.C.)	Fred Wistow, Esq. (Assistant Counsel, Warner Communications, Inc.)		AC
27	12/29/1988	Enclosure to letter reflecting legal advice regarding Birch Tree Group Ltd.	Robert G. Shepherd, Esq. (Matthews, Woodbridge, Goebel, Pugh & Collins, P.C.)	Fred Wistow, Esq. (Assistant Counsel, Warner Communications, Inc.)		AC
28	12/30/1988	Enclosure to letter reflecting legal advice regarding Birch Tree Group Ltd.	Robert G. Shepherd, Esq. (Matthews, Woodbridge, Goebel, Pugh & Collins, P.C.)	Fred Wistow, Esq. (Assistant Counsel, Warner Communications, Inc.)		AC
29	Unknown	Handwritten notes of Don Biederman reflecting legal advice regarding Birch Tree Group Ltd.	Don Biederman, Esq. (Legal Department, Warner/Chappell Music, Inc.)			AC
30	11/16/1988	Handwritten notes of Don Biederman reflecting legal advice regarding Birch Tree Group Ltd.	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)			AC
31	Unknown	Handwritten notes of Don Biederman reflecting legal advice regarding Birch Tree Group Ltd.	Don Biederman, Esq. (Legal Department, Warner/Chappell Music, Inc.)			AC

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32	1/5/1990	Letter reflecting legal advice regarding "Happy Birthday to You"; handwritten correspondence from Don Biederman, Esq., to John Brunning, Esq. (Legal Department, Warner Bros. Music-UK) reflecting the same	David K. Sengstack (Consultant to Warner/Chappell Music, Inc.)	Jay R. Morgenstern (President, Warner Bros. Publications, Inc.)	John C. Taylor, Esq. (Paul, Weiss, Rifkind, Wharton & Garrison)	AC
33	11/17/1988	Inter office memo reflecting legal advice regarding Birch Tree Group Ltd.	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	Leslie E. Bider (President & CEO, Warner/Chappell Music, Inc.)	Jay R. Morgenstern (Executive Vice President and General Manager, Warner/Chappell Music, Inc.); Ira Pianko (Chief Financial Officer, Warner/Chappell Music, Inc.)	AC
34	4/14/1994	Fax reflecting legal advice regarding "Happy Birthday to You"	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	Lennart Desmond (Warner/Chappell Music Scandinavia)	Audrey Sporleder (Senior Director, Contract Administration, Warner/Chappell Music, Inc.)	AC, WP

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35	4/11/1994	Letter reflecting legal advice and reflecting request for legal advice regarding "Happy Birthday to You"; handwritten notes of Don Biederman, Esq., reflecting the same	Lennart Desmond (Warner/Chappell Music Scandinavia)	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	Gunilla Raita (Warner/Chappell Music Scandinavia); Hans Desmond (Warner/Chappell Music Scandinavia); Roy Colegate (Warner/Chappell Music Scandinavia); Malin Bergmann (Warner/Chappell Music Scandinavia); Ann- Caitrin Welanders (Warner/Chappell Music Scandinavia)	AC, WP

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36	4/11/1994	Attachment to letter reflecting legal advice regarding "Happy Birthday to You" and request for legal advice regarding "Happy Birthday to You"	Lennart Desmond (Warner/Chappell Music Scandinavia)	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	Gunilla Raita (Warner/Chappell Music Scandinavia); Hans Desmond (Warner/Chappell Music Scandinavia); Roy Colegate (Warner/Chappell Music Scandinavia); Malin Bergmann (Warner/Chappell Music Scandinavia); Ann-Caitrin Welandar (Warner/Chappell Music Scandinavia)	AC, WP
37	5/24/1991	Letter reflecting response to request for legal advice regarding "Happy Birthday to You" in connection with litigation in Brazil	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	Miguel Aranega (General Manager, Warner/Chappell Music Brazil)	Ed Pierson, Esq. (Legal Department, Warner/Chappell Music, Inc.); Ed Arrow (Copyright Department, Warner/Chappell Music, Inc.)	AC, WP

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Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
38	5/24/1991	Draft letter (addressed to "To whom it may concern") regarding "Happy Birthday to You" attached to letter reflecting response to request for legal advice regarding "Happy Birthday to You" in connection with litigation in Brazil	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	Miguel Aranega (General Manager, Warner/Chappell Music Brazil)	Ed Pierson, Esq. (Legal Department, Warner/Chappell Music, Inc.); Ed Arrow (Copyright Department, Warner/Chappell Music, Inc.)	AC, WP
39	5/24/1991	Attachment to draft letter (addressed to "To whom it may concern") regarding "Happy Birthday to You" attached to letter reflecting response to request for legal advice regarding "Happy Birthday to You" in connection with litigation in Brazil	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	Miguel Aranega (General Manager, Warner/Chappell Music Brazil)	Ed Pierson, Esq. (Legal Department, Warner/Chappell Music, Inc.); Ed Arrow (Copyright Department, Warner/Chappell Music, Inc.)	AC, WP
40	5/24/1991	Attachment to draft letter (addressed to "To whom it may concern") regarding "Happy Birthday to You" attached to letter reflecting response to request for legal advice regarding "Happy Birthday to You" in connection with litigation in Brazil	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	Miguel Aranega (General Manager, Warner/Chappell Music Brazil)	Ed Pierson, Esq. (Legal Department, Warner/Chappell Music, Inc.); Ed Arrow (Copyright Department, Warner/Chappell Music, Inc.)	AC, WP
41	5/24/1991	Attachment to draft letter (addressed to "To whom it may concern") regarding "Happy Birthday to You" attached to letter reflecting response to request for legal advice regarding "Happy Birthday to You" in connection with litigation in Brazil	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	Miguel Aranega (General Manager, Warner/Chappell Music Brazil)	Ed Pierson, Esq. (Legal Department, Warner/Chappell Music, Inc.); Ed Arrow (Copyright Department, Warner/Chappell Music, Inc.)	AC, WP

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Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
42	5/24/1991	Attachment to draft letter (addressed to "To whom it may concern") regarding "Happy Birthday to You" attached to letter reflecting response to request for legal advice regarding "Happy Birthday to You" in connection with litigation in Brazil	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	Miguel Aranega (General Manager, Warner/Chappell Music Brazil)	Ed Pierson, Esq. (Legal Department, Warner/Chappell Music, Inc.); Ed Arrow (Copyright Department, Warner/Chappell Music, Inc.)	AC, WP
43	5/24/1991	Attachment to draft letter (addressed to "To whom it may concern") regarding "Happy Birthday to You" attached to letter reflecting response to request for legal advice regarding "Happy Birthday to You" in connection with litigation in Brazil	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	Miguel Aranega (General Manager, Warner/Chappell Music Brazil)	Ed Pierson, Esq. (Legal Department, Warner/Chappell Music, Inc.); Ed Arrow (Copyright Department, Warner/Chappell Music, Inc.)	AC, WP
44	5/24/1991	Attachment to draft letter (addressed to "To whom it may concern") regarding "Happy Birthday to You" attached to letter reflecting response to request for legal advice regarding "Happy Birthday to You" in connection with litigation in Brazil	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	Miguel Aranega (General Manager, Warner/Chappell Music Brazil)	Ed Pierson, Esq. (Legal Department, Warner/Chappell Music, Inc.); Ed Arrow (Copyright Department, Warner/Chappell Music, Inc.)	AC, WP
45	5/24/1991	Attachment to draft letter (addressed to "To whom it may concern") regarding "Happy Birthday to You" attached to letter reflecting response to request for legal advice regarding "Happy Birthday to You" in connection with litigation in Brazil	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	Miguel Aranega (General Manager, Warner/Chappell Music Brazil)	Ed Pierson, Esq. (Legal Department, Warner/Chappell Music, Inc.); Ed Arrow (Copyright Department, Warner/Chappell Music, Inc.)	AC, WP

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Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
46	5/24/1991	Fax reflecting request for legal advice regarding "Happy Birthday to You" in connection with litigation in Brazil	Miguel Aranega (General Manager, Warner/Chappell Music Brazil)	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	Charles Goldstruck (Warner/Chappell Music, Inc.)	AC, WP
47	5/23/1991	Letter reflecting legal advice regarding "Happy Birthday to You" in connection with litigation in Brazil	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	Miguel Aranega (General Manager, Warner/Chappell Music Brazil)	Charles Goldstruck (Warner/Chappell Music, Inc.); Ed Pierson, Esq. (Legal Department, Warner/Chappell Music, Inc.); Ed Arrow (Copyright Department, Warner/Chappell Music, Inc.); David Nimmer, Esq. (Irell & Manella, LLP)	AC, WP
48	5/22/1991	Fax reflecting request for legal advice regarding "Happy Birthday to You" in connection with litigation in Brazil	Miguel Aranega (General Manager, Warner/Chappell Music Brazil)	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	Charles Goldstruck (Warner/Chappell Music, Inc.)	AC, WP

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Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
49	11/16/1988	Fax reflecting legal advice regarding "Happy Birthday to You"	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	John Brunning, Esq. (Legal Department, Warner Bros. Music-UK)		AC
50	11/18/1988	Handwritten correspondence from Don Biederman, Esq., to Neil Boorstyn, Esq., reflecting legal advice and reflecting request for legal advice regarding the Hill Foundation and regarding "Happy Birthday to You" copyright under UK law, and forwarding attached document and enclosures from Kate Chen (Birch Tree Group Ltd.) reflecting legal advice and reflecting request for legal advice regarding "Happy Birthday to You" copyright under UK law	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	Neil Boorstyn, Esq. (Townsend and Townsend)		AC
51	11/18/1988	Attachment to handwritten correspondence from Don Biederman, Esq., to Neil Boorstyn, Esq., reflecting legal advice and reflecting request for legal advice regarding the Hill Foundation and regarding "Happy Birthday to You" copyright under UK law, and forwarding attached document and enclosures from Kate Chen (Birch Tree Group Ltd.) reflecting legal advice and reflecting request for legal advice regarding "Happy Birthday to You" copyright under UK law	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	Neil Boorstyn, Esq. (Townsend and Townsend)		AC

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Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
52	11/18/1988	Attachment to handwritten correspondence from Don Biederman, Esq., to Neil Boorstyn, Esq., reflecting legal advice and reflecting request for legal advice regarding Hill Foundation and regarding "Happy Birthday to You" copyright under UK law, and forwarding attached document and enclosures from Kate Chen (Birch Tree Group Ltd.) reflecting legal advice and reflecting request for legal advice regarding "Happy Birthday to You" copyright under UK law	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	Neil Boorstyn, Esq. (Townsend and Townsend)		AC
53	11/18/1988	Attachment to handwritten correspondence from Don Biederman, Esq., to Neil Boorstyn, Esq., reflecting legal advice and reflecting request for legal advice regarding the Hill Foundation and regarding "Happy Birthday to You" copyright under UK law, and forwarding attached document and enclosures from Kate Chen (Birch Tree Group Ltd.) reflecting legal advice and reflecting request for legal advice regarding "Happy Birthday to You" copyright under UK law	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	Neil Boorstyn, Esq. (Townsend and Townsend)		AC
54	9/3/1995	Fax reflecting legal advice and reflecting request for legal advice regarding "Happy Birthday to You"; handwritten correspondence between Don Biederman, Esq. and Jay Morgenstern reflecting legal advice and reflecting request for legal advice regarding "Happy Birthday to You"	Maguy Heyman (Copyright Department, Warner/Chappell Music France S.A.)	Neil Gillis (Senior Vice President, Creative Services, Warner/Chappell Music, Inc.)	Don Biederman, Esq. (Executive Vice President and General Counsel, Warner/Chappell Music, Inc.); Jean Davoust (Warner/Chappell Music France S.A.)	AC

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Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
55	9/13/1996	Fax reflecting legal advice and reflecting request for legal advice regarding "Happy Birthday to You"; handwritten draft correspondence from Don Biederman, Esq. to John Woodward reflecting legal advice regarding "Happy Birthday to You"	John Woodward (Warner/Chappell Music Ltd. Legal-UK)	Don Biederman, Esq. (Executive Vice President and General Counsel, Warner/Chappell Music, Inc.)	Andrew Gummer, Esq. (Director, Warner/Chappell Music, Inc. United Kingdom)	AC
56	9/3/1996	Fax reflecting legal advice and reflecting request for legal advice regarding "Happy Birthday to You"; handwritten draft correspondence from Don Biederman, Esq. to John Woodward reflecting legal advice regarding "Happy Birthday to You"; handwritten draft correspondence from Don Biederman, Esq. to David Nimmer, Esq. and Ken Abdo, Esq. reflecting request for legal advice regarding "Happy Birthday to You"	John Woodward (Warner/Chappell Music Ltd. Legal-UK)	Don Biederman, Esq. (Executive Vice President and General Counsel, Warner/Chappell Music, Inc.)	Andrew Gummer, Esq. (Director, Warner/Chappell Music, Inc. United Kingdom)	AC
57	9/3/1996	Fax reflecting legal advice and reflecting request for legal advice regarding "Happy Birthday to You" and handwritten draft correspondence from Don Biederman, Esq. to David Nimmer, Esq. and Ken Abdo, Esq. reflecting request for legal advice regarding "Happy Birthday to You"	John Woodward (Warner/Chappell Music Ltd. Legal-UK)	Don Biederman, Esq. (Executive Vice President and General Counsel, Warner/Chappell Music, Inc.)	Andrew Gummer, Esq. (Director, Warner/Chappell Music, Inc. United Kingdom)	AC
58	9/3/1996	Fax cover sheet reflecting legal advice and reflecting request for legal advice regarding "Happy Birthday to You" and handwritten draft correspondence from Don Biederman, Esq. to David Nimmer, Esq. and Ken Abdo, Esq. reflecting request for legal advice regarding "Happy Birthday to You"	John Woodward (Warner/Chappell Music Ltd. Legal-UK)	Don Biederman, Esq. (Executive Vice President and General Counsel, Warner/Chappell Music, Inc.)	Andrew Gummer, Esq. (Director, Warner/Chappell Music, Inc. United Kingdom)	AC

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59	5/28/1996	Memo reflecting legal advice and reflecting request for legal advice regarding "Happy Birthday to You"	Don Biederman, Esq. (Executive Vice President and General Counsel, Warner/Chappell Music, Inc.)	David Nimmer, Esq. (Irell & Manella LLP)	Leslie E. Bider (President & CEO, Warner/Chappell Music, Inc.); Jay R. Morgenstern (Executive Vice President and General Manager, Warner/Chappell Music, Inc.); Ira Pianko (Chief Financial Officer, Warner/Chappell Music, Inc.); Gerald J. Sherman, Esq.	AC

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Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
60	5/22/1996	Fax reflecting request for legal advice regarding "Happy Birthday to You"	Don Biederman, Esq. (Executive Vice President and General Counsel, Warner/Chappell Music, Inc.)	Gerald J. Sherman, Esq.	Leslie E. Bider (President & CEO, Warner/Chappell Music, Inc.); Jay R. Morgenstern (Executive Vice President and General Manager, Warner/Chappell Music, Inc.); Ira Pianko (Chief Financial Officer, Warner/Chappell Music, Inc.); Rick Shoemaker (President, Warner/Chappell Music, Inc.); Jack Rosner (Senior Vice President, Head of Synchronization Licensing, Warner/Chappell Music, Inc.); Ed Pierson, Esq. (Legal Department, Warner/Chappell Music, Inc.)	AC

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61	5/22/1996	Attachment to fax reflecting request for legal advice regarding "Happy Birthday to You" and handwritten notes of Don Biederman, Esq. and Ed Pierson, Esq. reflecting legal advice and reflecting request for legal advice regarding "Happy Birthday to You"	Don Biederman, Esq. (Executive Vice President and General Counsel, Warner/Chappell Music, Inc.)	Gerald J. Sherman, Esq.	Leslie E. Bider (President & CEO, Warner/Chappell Music, Inc.); Jay R. Morgenstern (Executive Vice President and General Manager, Warner/Chappell Music, Inc.); Ira Pianko (Chief Financial Officer, Warner/Chappell Music, Inc.); Rick Shoemaker (President, Warner/Chappell Music, Inc.); Jack Rosner (Senior Vice President, Head of Synchronization Licensing, Warner/Chappell Music, Inc.); Ed Pierson, Esq. (Legal Department, Warner/Chappell Music, Inc.)	AC

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62	5/22/1996	Attachment to fax reflecting request for legal advice regarding "Happy Birthday to You"	Don Biederman, Esq. (Executive Vice President and General Counsel, Warner/Chappell Music, Inc.)	Gerald J. Sherman, Esq.	Leslie E. Bider (President & CEO, Warner/Chappell Music, Inc.); Jay R. Morgenstern (Executive Vice President and General Manager, Warner/Chappell Music, Inc.); Ira Pianko (Chief Financial Officer, Warner/Chappell Music, Inc.); Rick Shoemaker (President, Warner/Chappell Music, Inc.); Jack Rosner (Senior Vice President, Head of Synchronization Licensing, Warner/Chappell Music, Inc.); Ed Pierson, Esq. (Legal Department, Warner/Chappell Music, Inc.)	AC

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63	5/22/1996	Fax cover sheet reflecting request for legal advice regarding "Happy Birthday to You"	Don Biederman, Esq. (Executive Vice President and General Counsel, Warner/Chappell Music, Inc.)	Gerald J. Sherman, Esq.	Leslie E. Bider (President & CEO, Warner/Chappell Music, Inc.); Jay R. Morgenstern (Executive Vice President and General Manager, Warner/Chappell Music, Inc.); Ira Pianko (Chief Financial Officer, Warner/Chappell Music, Inc.); Rick Shoemaker (President, Warner/Chappell Music, Inc.); Jack Rosner (Senior Vice President, Head of Synchronization Licensing, Warner/Chappell Music, Inc.); Ed Pierson, Esq. (Warner/Chappell Music, Inc. Senior Vice President Legal and Business Affairs)	AC

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Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
64	5/22/1996	Attachment to fax reflecting request for legal advice regarding "Happy Birthday to You" and handwritten notes of Don Biederman, Esq. and Ed Pierson, Esq. reflecting legal advice and reflecting request for legal advice regarding "Happy Birthday to You"	Don Biederman, Esq. (Executive Vice President and General Counsel, Warner/Chappell Music, Inc.)	Gerald J. Sherman, Esq.	Leslie E. Bider (President & CEO, Warner/Chappell Music, Inc.); Jay R. Morgenstern (Executive Vice President and General Manager, Warner/Chappell Music, Inc.); Ira Pianko (Chief Financial Officer, Warner/Chappell Music, Inc.); Rick Shoemaker (President, Warner/Chappell Music, Inc.); Jack Rosner (Senior Vice President, Head of Synchronization Licensing, Warner/Chappell Music, Inc.); Ed Pierson, Esq. (Warner/Chappell Music, Inc. Senior Vice President Legal and Business Affairs)	AC

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Defendants' Privilege Log (May 9, 2014)

Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
65	5/22/1996	Attachment to fax reflecting request for legal advice regarding "Happy Birthday to You"	Don Biederman, Esq. (Executive Vice President and General Counsel, Warner/Chappell Music, Inc.)	Gerald J. Sherman, Esq.	Leslie E. Bider (President & CEO, Warner/Chappell Music, Inc.); Jay R. Morgenstern (Executive Vice President and General Manager, Warner/Chappell Music, Inc.); Ira Pianko (Chief Financial Officer, Warner/Chappell Music, Inc.); Rick Shoemaker (President, Warner/Chappell Music, Inc.); Jack Rosner (Senior Vice President, Head of Synchronization Licensing, Warner/Chappell Music, Inc.); Ed Pierson, Esq. (Warner/Chappell Music, Inc. Senior Vice President Legal and Business Affairs)	AC

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Defendants' Privilege Log (May 9, 2014)

Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
66	8/6/1996	Fax reflecting legal advice and reflecting request for legal advice regarding correspondence with Bob Katzmarek regarding "Happy Birthday to You"	Don Biederman, Esq. (Executive Vice President and General Counsel, Warner/Chappell Music, Inc.)	Ken Abdo, Esq. (Abdo & Abdo, P.A.)	Ed Pierson, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	AC
67	7/30/1996	Fax reflecting legal advice regarding correspondence with Robert Katzmarek regarding "Happy Birthday to You" and handwritten draft correspondence from Don Biederman, Esq. to David Nimmer, Esq., reflecting request for legal advice regarding the same	Ken Abdo, Esq. (Abdo & Abdo, P.A.)	Don Biederman, Esq. (Executive Vice President and General Counsel, Warner/Chappell Music, Inc.)		AC
68	7/30/1996	Attachment to fax reflecting legal advice regarding correspondence with Bob Katzmarek regarding "Happy Birthday to You" (draft letter from Ken Abdo to Bob Katzmarek regarding "Happy Birthday to You")	Ken Abdo, Esq. (Abdo & Abdo, P.A.)	Don Biederman, Esq. (Executive Vice President and General Counsel, Warner/Chappell Music, Inc.)		AC
69	7/30/1996	Fax reflecting legal advice regarding correspondence with Robert Katzmarek regarding "Happy Birthday to You"	Ken Abdo, Esq. (Abdo & Abdo, P.A.)	Don Biederman, Esq. (Executive Vice President and General Counsel, Warner/Chappell Music, Inc.)		AC
70	7/30/1996	Attachment to fax reflecting legal advice regarding correspondence with Bob Katzmarek regarding "Happy Birthday to You" (draft letter from Ken Abdo to Bob Katzmarek regarding "Happy Birthday to You")	Ken Abdo, Esq. (Abdo & Abdo, P.A.)	Don Biederman, Esq. (Executive Vice President and General Counsel, Warner/Chappell Music, Inc.)		AC

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Defendants' Privilege Log (May 9, 2014)

Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
71	7/8/1996	Letter reflecting legal advice regarding "Happy Birthday to You"	David Nimmer, Esq. (Irell & Manella LLP)	Don Biederman, Esq. (Executive Vice President and General Counsel, Warner/Chappell Music, Inc.)		AC
72	7/8/1996	Attachment to letter reflecting legal advice regarding "Happy Birthday to You"	David Nimmer, Esq. (Irell & Manella LLP)	Don Biederman, Esq. (Executive Vice President and General Counsel, Warner/Chappell Music, Inc.)		AC
73	7/8/1996	Attachment to letter reflecting legal advice regarding "Happy Birthday to You"	David Nimmer, Esq. (Irell & Manella LLP)	Don Biederman, Esq. (Executive Vice President and General Counsel, Warner/Chappell Music, Inc.)		AC
74	7/8/1996	Attachment to letter reflecting legal advice regarding "Happy Birthday to You"	David Nimmer, Esq. (Irell & Manella LLP)	Don Biederman, Esq. (Executive Vice President and General Counsel, Warner/Chappell Music, Inc.)		AC
75	7/8/1996	Attachment to letter reflecting legal advice regarding "Happy Birthday to You"	David Nimmer, Esq. (Irell & Manella LLP)	Don Biederman, Esq. (Executive Vice President and General Counsel, Warner/Chappell Music, Inc.)		AC

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Defendants' Privilege Log (May 9, 2014)

Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
76	7/8/1996	Attachment to letter reflecting legal advice regarding "Happy Birthday to You"	David Nimmer, Esq. (Irell & Manella LLP)	Don Biederman, Esq. (Executive Vice President and General Counsel, Warner/Chappell Music, Inc.)		AC
77	7/8/1996	Attachment to letter reflecting legal advice regarding "Happy Birthday to You"	David Nimmer, Esq. (Irell & Manella LLP)	Don Biederman, Esq. (Executive Vice President and General Counsel, Warner/Chappell Music, Inc.)		AC
78	7/8/1996	Attachment to letter reflecting legal advice regarding "Happy Birthday to You"	David Nimmer, Esq. (Irell & Manella LLP)	Don Biederman, Esq. (Executive Vice President and General Counsel, Warner/Chappell Music, Inc.)		AC
79	6/21/1996	Letter reflecting legal advice regarding "Happy Birthday to You"; handwritten correspondence from Don Biederman to Warner Chappell Music, Inc., legal department reflecting legal advice regarding "Happy Birthday to You"	David Nimmer, Esq. (Irell & Manella LLP)	Don Biederman, Esq. (Executive Vice President and General Counsel, Warner/Chappell Music, Inc.)		AC
80	4/30/1996	Fax reflecting request for legal advice regarding "Happy Birthday to You" and correspondence with Bob Katzmarek regarding the same	Don Biederman, Esq. (Executive Vice President and General Counsel, Warner/Chappell Music, Inc.)	Ken Abdo, Esq. (Abdo & Abdo, P.A.)	Ed Pierson, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	AC

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Defendants' Privilege Log (May 9, 2014)

Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
81	4/30/1996	Fax reflecting request for legal advice regarding "Happy Birthday to You" and correspondence with Bob Katzmarek regarding the same	Don Biederman, Esq. (Executive Vice President and General Counsel, Warner/Chappell Music, Inc.)	Ken Abdo, Esq. (Abdo & Abdo, P.A.)	Ed Pierson, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	AC
82	4/30/1996	Fax cover sheet reflecting request for legal advice regarding "Happy Birthday to You" and correspondence with Bob Katzmarek regarding the same	Don Biederman, Esq. (Executive Vice President and General Counsel, Warner/Chappell Music, Inc.)	Ken Abdo, Esq. (Abdo & Abdo, P.A.)	Ed Pierson, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	AC
83	Unknown	Handwritten notes reflecting legal advice regarding communications with Bob Katzmarek regarding "Happy Birthday to You"; handwritten correspondence from Don Biederman, Esq., to Steve Scott (Warner/Chappell Music, Inc.) regarding the same	Don Biederman, Esq. (Legal Department, Warner/Chappell Music Co.)			AC
84	Unknown	Handwritten notes reflecting legal advice regarding communications with Bob Katzmarek regarding "Happy Birthday to You"	Don Biederman, Esq. (Legal Department, Warner/Chappell Music Co.)			AC
85	Unknown	Handwritten notes reflecting legal advice regarding communications with Bob Katzmarek regarding "Happy Birthday to You"; handwritten correspondence from Don Biederman, Esq., to Steve Scott (Warner/Chappell Music, Inc.) regarding the same	Don Biederman, Esq. (Legal Department, Warner/Chappell Music Co.)			AC

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Defendants' Privilege Log (May 9, 2014)

Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
86	4/23/1996	Memo reflecting legal advice regarding "Happy Birthday to You" and communication with Bob Katzmarek regarding the same	Don Biederman, Esq. (Executive Vice President and General Counsel, Warner/Chappell Music, Inc.)	Legal File	Leslie E. Bider (President & CEO, Warner/Chappell Music, Inc.)	AC
87	7/14/1966	Letter reflecting legal advice regarding "Happy Birthday to You"	C. Lyman Emrich, Jr., Esq. (Brown, Jackson, Boettcher & Dienner)	David K. Sengstack (President, Summy-Birchard Co.)		AC
88	7/8/1966	Letter reflecting legal advice regarding "Happy Birthday to You"	Rubenstein, Nash & Co.	Brown, Jackson, Boettcher & Dienner		AC
89	6/28/1966	Letter reflecting legal advice regarding "Happy Birthday to You"	Brown, Jackson, Boettcher & Dienner	Rubenstein, Nash & Co.		AC
90	3/8/1967	Letter from UK performing rights society to UK exclusive subpublisher of "Happy Birthday to You" reflecting legal advice regarding issues related to "Happy Birthday to You" copyright under UK law	Denis de Freitas, Esq. (Legal Department, The Performing Right Society Ltd.)	P. A. Howgill, Esq. (Administrative Manager, Keith Prowse Music Publishing Co. Ltd.)		AC
91	3/16/1967	Letter reflecting legal advice regarding "Happy Birthday to You"	C. Lyman Emrich, Jr., Esq. (Brown, Jackson, Boettcher & Dienner)	David K. Sengstack (President, Summy-Birchard Co.)	John A. Kelly, Jr., Esq.	AC
92	3/10/1967	Letter from UK exclusive subpublisher of "Happy Birthday to You" to UK performing rights society reflecting legal advice regarding issues related to "Happy Birthday to You" copyright under UK law	P. A. Howgill, Esq. (Administrative Manager, Keith Prowse Music Publishing Co. Ltd.)	Denis de Freitas, Esq. (Legal Department, The Performing Right Society, Ltd.)	C. Lyman Emrich, Jr., Esq. (Brown, Jackson, Boettcher & Dienner)	AC

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Defendants' Privilege Log (May 9, 2014)

Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
93	5/22/1967	Letter to UK exclusive subpublisher of "Happy Birthday to You" reflecting legal advice regarding "Happy Birthday to You"	C. Lyman Emrich, Jr., Esq. (Brown, Jackson, Boettcher & Dienner)	P. A. Howgill, Esq. (Administrative Manager, Keith Prowse Music Publishing Co. Ltd.)	David K. Sengstack (President, Summy-Birchard Co.)	AC
94	Unknown	Typewritten notes reflecting legal advice regarding "Happy Birthday to You"	P. A. Howgill, Esq. (Administrative Manager, Keith Prowse Music Publishing Co. Ltd.)			AC
95	8/4/1967	Letter to UK exclusive subpublisher of "Happy Birthday to You" reflecting legal advice regarding "Happy Birthday to You"	C. Lyman Emrich, Jr., Esq. (Brown, Jackson, Boettcher & Dienner)	P. A. Howgill, Esq. (Administrative Manager, Keith Prowse Music Publishing Co. Ltd.)		AC
96	8/17/1967	Letter from UK exclusive subpublisher of "Happy Birthday to You" reflecting legal advice and reflecting request for legal advice regarding "Happy Birthday to You"	P. A. Howgill, Esq. (Administrative Manager, Keith Prowse Music Publishing Co. Ltd.)	C. Lyman Emrich, Jr., Esq. (Brown, Jackson, Boettcher & Dienner)		AC
97	11/29/1968	Letter reflecting legal advice and reflecting request for legal advice regarding "Happy Birthday to You"	C. Lyman Emrich, Jr., Esq. (Brown, Jackson, Boettcher & Dienner)	David K. Sengstack (President, Summy-Birchard Co.); Patrick W. O'Brien, Esq. (Mayer, Friedlich, Spless, Tierney, Brown & Platt)		AC

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Defendants' Privilege Log (May 9, 2014)

Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
98	12/18/1968	Letter to UK exclusive subpublisher of "Happy Birthday to You" reflecting legal advice regarding "Happy Birthday to You"; handwritten correspondence from C. Lyman Emrich, Jr., Esq. to David K. Sengstack reflecting the same	C. Lyman Emrich, Jr., Esq. (Brown, Jackson, Boettcher & Dienner)	P. A. Howgill, Esq. (Administrative Manager, Keith Prowse Music Publishing Co. Ltd.)		AC
99	2/13/1969	Letter to UK exclusive subpublisher of "Happy Birthday to You" reflecting legal advice and reflecting request for legal advice regarding "Happy Birthday to You"	C. Lyman Emrich, Jr., Esq. (Brown, Jackson, Boettcher & Dienner)	P. A. Howgill, Esq. (Administrative Manager, Keith Prowse Music Publishing Co. Ltd.)		AC

Defendants' Privilege Log (May 9, 2014)

Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
100	3/1/1989	Memorandum reflecting legal advice regarding "Happy Birthday to You"	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	Sy Feldman (Warner/Chappell Music, Inc.); Lynn Sengstack (Warner/Chappell Music, Inc.); Bob Alexander (Warner/Chappell Music, Inc.)	Leslie E. Bider (President & CEO, Warner/Chappell Music, Inc.); Jay R. Morgenstern (Executive Vice President and General Manager, Warner/Chappell Music, Inc.); Jack Rosner (Senior Vice President, Head of Synchronization Licensing, Warner/Chappell Music, Inc.); Al Kohn (Vice President, Licensing, Warner/Chappell Music, Inc.); Linda Kohn (Warner/Chappell Music, Inc.); John Brunning, Esq. (Legal Department, Warner Bros. Music-UK)	AC
101	12/30/1986	Letter reflecting legal advice regarding "Happy Birthday to You"	Dennis Angel, Esq.	Ron Gertz, Esq. (Clearing House, Ltd.)		AC

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Defendants' Privilege Log (May 9, 2014)

Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
102	3/14/1990	Letter reflecting request for legal advice regarding "Happy Birthday to You"	David K. Sengstack (Consultant to Warner/Chappell Music, Inc.)	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)		AC
103	5/8/1989	Letter from parent of exclusive UK subpublisher of "Happy Birthday to You" to UK performing rights society reflecting legal advice and reflecting request for legal advice regarding "Happy Birthday to You" copyright under UK law	Caroline Chandler (Business Affairs Assistant, EMI Music Publishing)	Geoffrey Ellis (Repertoire Controller, The Performing Right Society, Ltd.)		AC
104	5/8/1989	Letter from parent of exclusive UK subpublisher of "Happy Birthday to You" to UK performing rights society reflecting legal advice and reflecting request for legal advice regarding "Happy Birthday to You" copyright under UK law	Crispin Evans (Director & Manager, Commercial Affairs, EMI Music Publishing)	Geoffrey Ellis (Repertoire Controller, The Performing Right Society, Ltd.)		AC
105	3/29/1967	Letter from UK performing rights society to UK subpublisher of "Happy Birthday to You" reflecting legal advice regarding issues related to "Happy Birthday to You" copyright under UK law	R. F. Whale (General Manager, The Performing Right Society Ltd.)	J. J. Phillips, Esq. (Keith Prowse Music Publishing Co. Ltd.)		AC
106	5/25/1989	Letter from parent of exclusive UK subpublisher of "Happy Birthday to You" reflecting legal advice regarding "Happy Birthday to You"	Crispin Evans (Director & Manager, Commercial Affairs, EMI Music Publishing)	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	John Brunning, Esq. (Legal Department, Warner Bros. Music-UK)	AC
107	5/16/1963	Letter reflecting legal advice regarding communication with potential licensee regarding "Happy Birthday to You"	C. Lyman Emrich, Jr., Esq. (Brown, Jackson, Boettcher & Dienner)	David K. Sengstack (President, Summy-Birchard Co.)		AC

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Defendants' Privilege Log (May 9, 2014)

Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
108	6/6/1974	Letter reflecting legal advice regarding correspondence with potential licensee regarding "Happy Birthday to You"	C. Lyman Emrich, Jr., Esq. (Brown, Jackson, Boettcher & Dienner)	Roberta Savler (Publication Director, Summy-Birchard Co.)	Charles Liebman, Esq.; David K. Sengstack (President, Summy-Birchard Co.)	AC
109	6/6/1974	Attachment to letter reflecting legal advice regarding correspondence with potential licensee regarding "Happy Birthday to You"	C. Lyman Emrich, Jr., Esq. (Brown, Jackson, Boettcher & Dienner)	Roberta Savler (Publication Director, Summy-Birchard Co.)	Charles Liebman, Esq.; David K. Sengstack (President, Summy-Birchard Co.)	AC
110	10/8/1968	Letter reflecting legal advice regarding communication with potential licensee regarding "Happy Birthday to You"	Patrick W. O'Brien, Esq. (Mayer, Friedlich, Spless, Tierney, Brown & Platt)	David K. Sengstack (President, Summy-Birchard Co.)		AC
111	Unknown	Transcription of telephone conversation between C. Lyman Emrich, Jr., Esq., Patrick O'Brien, Esq., David Sengstack and Roberta Savler reflecting legal advice regarding "Happy Birthday to You" and correspondence with potential licensee regarding the same	C. Lyman Emrich, Jr., Esq. (Brown, Jackson, Boettcher & Dienner)			AC
112	6/9/1965	Letter reflecting legal advice regarding "Happy Birthday to You" and correspondence with potential licensee regarding the same	C. Lyman Emrich, Jr., Esq. (Brown, Jackson, Boettcher & Dienner)	David K. Sengstack (President, Summy-Birchard Co.)		AC
113	5/13/1963	Letter reflecting legal advice regarding correspondence with potential licensee regarding "Happy Birthday to You"	C. Lyman Emrich, Jr., Esq. (Brown, Jackson, Boettcher & Dienner)	Theodore Kupferman, Esq. (Kupferman & Price)	David K. Sengstack (President, Summy-Birchard Co.)	AC
114	4/14/1982	Memo reflecting request for legal advice regarding communication with potential licensee regarding "Happy Birthday to You"	NJR (Summy-Birchard Co.)	Legal File		AC

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Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
115	3/30/1982	Memo reflecting request for legal advice regarding communication with potential licensee regarding "Happy Birthday to You"	NJR (Summy-Birchard Co.)	Legal File	FWM (Summy-Birchard Co.); David K. Sengstack (President, Summy-Birchard Co.)	AC
116	12/7/1966	Letter reflecting legal advice regarding correspondence with potential licensees regarding "Happy Birthday to You"	C. Lyman Emrich, Jr., Esq. (Brown, Jackson, Boettcher & Dienner)	David K. Sengstack (President, Summy-Birchard Co.)		AC
117	7/31/1978	Correspondence reflecting request for legal advice regarding "Happy Birthday to You"	Roberta Savler (Publication Director, Summy-Birchard Co.)	Counsel for Summy-Birchard Co.		AC
118	7/31/1978	Attachment to correspondence reflecting request for legal advice regarding "Happy Birthday to You"	Roberta Savler (Publication Director, Summy-Birchard Co.)	Counsel for Summy-Birchard Co.		AC
119	7/31/1978	Attachment to correspondence reflecting request for legal advice regarding "Happy Birthday to You"	Roberta Savler (Publication Director, Summy-Birchard Co.)	Counsel for Summy-Birchard Co.		AC
120	7/31/1978	Correspondence reflecting request for legal advice regarding "Happy Birthday to You"	Roberta Savler (Publication Director, Summy-Birchard Co.)	Counsel for Summy-Birchard Co.		AC
121	7/31/1978	Attachment to correspondence reflecting request for legal advice regarding "Happy Birthday to You"	Roberta Savler (Publication Director, Summy-Birchard Co.)	Counsel for Summy-Birchard Co.		AC
122	7/31/1978	Attachment to correspondence reflecting request for legal advice regarding "Happy Birthday to You"	Roberta Savler (Publication Director, Summy-Birchard Co.)	Counsel for Summy-Birchard Co.		AC

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Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
123	4/3/1975	Letter reflecting request for legal advice regarding potential licensing of "Happy Birthday to You"	Roberta Savler (Publication Director, Summy-Birchard Co.)	Theodore R. Jackson, Esq. (Gilbert & Gilbert)		AC
124	4/18/1975	Letter reflecting request for legal advice regarding correspondence with potential licensee regarding "Happy Birthday to You"	Roberta Savler (Publication Director, Summy-Birchard Co.)	Theodore R. Jackson, Esq. (Gilbert & Gilbert)		AC
125	3/24/1975	Letter reflecting legal advice regarding correspondence with potential licensee regarding "Happy Birthday to You"	Theodore R. Jackson, Esq. (Gilbert & Gilbert)	Roberta Savler (Publication Director, Summy- Birchard Co.)		AC
126	11/8/1974	Letter reflecting legal advice regarding correspondence with unauthorized user of "Happy Birthday to You"	Roberta Savler (Publication Director, Summy-Birchard Co.)	Albert Berman (Managing Director, Harry Fox Agency, Inc.)		AC
127	11/8/1974	Attachment to letter reflecting legal advice regarding correspondence with unauthorized user of "Happy Birthday to You"	Roberta Savler (Publication Director, Summy-Birchard Co.)	Albert Berman (Managing Director, Harry Fox Agency, Inc.)		AC
128	11/8/1974	Attachment to letter reflecting legal advice regarding correspondence with unauthorized user of "Happy Birthday to You"	Roberta Savler (Publication Director, Summy-Birchard Co.)	Albert Berman (Managing Director, Harry Fox Agency, Inc.)		AC
129	5/4/1967	Letter reflecting legal advice regarding correspondence with unauthorized user of "Happy Birthday to You"	C. Lyman Emrich, Jr., Esq. (Brown, Jackson, Boettcher & Dienner)	D. Arthur Yergey, Esq.		AC, WP
130	1/26/1967	Letter reflecting legal advice regarding correspondence with unauthorized user of "Happy Birthday to You"	C. Lyman Emrich, Jr., Esq. (Brown, Jackson, Boettcher & Dienner)	L. C. Lunde (Administrative Assistant, Summy- Birchard Co.)		AC, WP

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Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
131	1/26/1967	Attachment to letter reflecting legal advice regarding correspondence with unauthorized user of "Happy Birthday to You"	C. Lyman Emrich, Jr., Esq. (Brown, Jackson, Boettcher & Dienner)	L. C. Lunde (Administrative Assistant, Summy-Birchard Co.)		AC, WP
132	1/6/1967	Letter reflecting legal advice regarding correspondence with unauthorized user of "Happy Birthday to You"	C. Lyman Emrich, Jr., Esq. (Brown, Jackson, Boettcher & Dienner)	David K. Sengstack (President, Summy-Birchard Co.)		AC, WP
133	1/6/1967	Attachment to letter reflecting legal advice regarding correspondence with unauthorized user of "Happy Birthday to You"	C. Lyman Emrich, Jr., Esq. (Brown, Jackson, Boettcher & Dienner)	David K. Sengstack (President, Summy-Birchard Co.)		AC, WP
134	Unknown	Draft letter to Nancy F. Wechsler and John R. Fawcett regarding "Happy Birthday to You" reflecting request for legal advice regarding correspondence with unauthorized user of "Happy Birthday to You"; handwritten note reflecting request to John Hough, Esq. (Price, Cushman, Keck, Mahin & Cate) for legal advice regarding the same	Counsel for Summy-Birchard Co.	Summy-Birchard Co.		AC
135	1/9/1985	Letter reflecting legal advice regarding correspondence with unauthorized user of "Happy Birthday to You"	Andrew M. Manshel, Esq. (Administrative Director and Counsel, Birch Tree Group Ltd.)	Howard Balsam, Esq. (Harry Fox Agency, Inc.)		AC
136	11/6/1984	Letter reflecting legal advice regarding correspondence with potential licensee regarding "Happy Birthday to You"	Andrew M. Manshel, Esq. (Administrative Director and Counsel, Birch Tree Group Ltd.)	Howard Balsam, Esq. (Harry Fox Agency, Inc.)		AC

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Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
137	8/7/1984	Letter reflecting legal advice regarding "Happy Birthday to You"	Andrew M. Manshel, Esq. (Administrative Director and Counsel, Birch Tree Group Ltd.)	Howard Balsam, Esq. (Harry Fox Agency, Inc.)		AC
138	7/31/1984	Letter reflecting legal advice regarding correspondence with unauthorized user of "Happy Birthday to You"	Howard Balsam, Esq. (Harry Fox Agency, Inc., Inc.)	Ernest R. Farmer (Summy-Birchard Music, Inc.)	Edward P. Murphy (Harry Fox Agency, Inc.)	AC
139	12/14/1988	Letter reflecting legal advice regarding "Happy Birthday to You"	Neil Boorstyn, Esq. (Townsend and Townsend)	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)		AC
140	4/5/1989	Letter reflecting legal advice regarding "Happy Birthday to You"	David Nimmer, Esq. (Irell & Manella LLP)	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)		AC
141	2/17/1989	Letter reflecting legal advice regarding "Happy Birthday to You"	David Nimmer, Esq. (Irell & Manella LLP)	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)		AC

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Defendants' Privilege Log (May 9, 2014)

Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
142	6/7/1989	Letter reflecting legal advice and reflecting request for legal advice regarding "Happy Birthday to You"	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	David Nimmer, Esq. (Irell & Manella LLP)		AC
143	6/7/1989	Attachment to letter reflecting legal advice and reflecting request for legal advice regarding "Happy Birthday to You"	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	David Nimmer, Esq. (Irell & Manella LLP)		AC
144	Unknown	Handwritten correspondence reflecting request for legal advice regarding "Happy Birthday to You" copyright in Japan	Don Biederman, Esq. (Legal Department, Warner/Chappell Music Co.)	John Brunning, Esq. (Legal Department, Warner Bros. Music-UK)		AC
145	5/25/1990	Letter reflecting legal advice regarding "Happy Birthday to You" copyright in Japan	David Nimmer, Esq. (Irell & Manella LLP)	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	Ed Pierson, Esq. (Legal Department, Warner/Chappell Music, Inc.); Jack Rosner (Senior Vice President, Head of Synchronization Licensing, Warner/Chappell Music, Inc.)	AC

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Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
146	3/7/2001	Email chain reflecting legal advice regarding "Happy Birthday to You" Earlier correspondence in chain: 3/6/2001: from Ed Pierson, Esq. to Audrey Sporleder copying Ilene Goldberg, Esq. and Guy Blake, Esq. 3/6/2001: from Guy Blake, Esq., to Ed Pierson, Esq., copying Audrey Sporleder and Ilene Goldberg, Esq. 3/6/2001: from Ed Pierson, Esq., to Ilene Goldberg, Esq., Guy Blake, Esq., and Audrey Sporleder 3/5/2001: from Merlene Travis to Ed Pierson, Esq.	Audrey Sporleder (Senior Director, Contract Administration, Warner/Chappell Music, Inc.)	Ed Pierson, Esq. (General Counsel, Warner/Chappell Music, Inc.)	Ilene Goldberg, Esq. (Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.); Guy Blake, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music Co.)	AC
147	2/21/2001	Memorandum from print agent reflecting legal advice regarding "Happy Birthday to You"	Teveya Dovbish, Esq. (Alfred Publishing Co., Inc.)	Ed Pierson, Esq. (General Counsel, Warner/Chappell Music, Inc.)	Guy Blake, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music Co.)	AC

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Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
148	6/27/2000	Email chain reflecting request for legal advice regarding "Happy Birthday to You" Earlier correspondence in chain: 6/26/2000: from Caesar Apostol to Scott Blietz 6/26/2000: from Alexander Mackintosh to Caesar Apostol 6/25/2000: from Caesar Apostol to Scott Blietz copying KC Low, Alex Mackintosh 6/23/2000: from Scott Blietz to Caesar Apostol 6/23/2000: from Caesar Apostol to Scott Blietz	Scott Blietz	Ed Pierson, Esq. (General Counsel, Warner/Chappell Music, Inc.)	Jack Rosner (Senior Vice President, Head of Synchronization Licensing, Warner/Chappell Music, Inc.)	AC
149	8/23/1993	Handwritten correspondence reflecting legal advice regarding "Happy Birthday to You"	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	Lynn Sengstack (Warner/Chappell Music, Inc.)		AC
150	8/18/1993	Handwritten correspondence reflecting request for legal advice regarding "Happy Birthday to You"	Lynn Sengstack (Warner/Chappell Music, Inc.)	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	Jack Rosner (Senior Vice President, Head of Synchronization Licensing, Warner/Chappell Music, Inc.)	AC

EX. A

Defendants' Privilege Log (May 9, 2014)

Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
151	8/18/1993	Attachment to handwritten correspondence reflecting request for legal advice regarding "Happy Birthday to You"	Lynn Sengstack (Warner/Chappell Music, Inc.)	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	Jack Rosen (Warner/Chappell Music, Inc.)	AC
152	8/23/1993	Fax cover of handwritten correspondence reflecting legal advice regarding "Happy Birthday to You";	Don Biederman, Esq. (Senior Vice President, Legal and Business Affairs, Warner/Chappell Music, Inc.)	Lynn Sengstack (Warner/Chappell Music, Inc.)	Jack Rosen (Warner/Chappell Music, Inc.)	AC
153	12/11/1979	Memorandum reflecting communication with potential licensee regarding "Happy Birthday to You" and reflecting request for legal advice regarding the same	Nancy Ruth Hoffman, Esq. (Legal Department, Summy-Birchard Co.)	Legal File		AC
154	12/21/1979	Memorandum reflecting legal advice regarding "Happy Birthday to You"	Nancy Ruth Hoffman, Esq. (Legal Department, Summy-Birchard Co.)	Legal File		AC
155	11/7/1963	Letter reflecting legal advice and reflecting request for legal advice regarding "Happy Birthday to You"	Theodore R. Kupferman, Esq. (Kupferman & Price)	David K. Sengstack (President, Summy-Birchard Co.)		AC
156	11/4/1963	Letter reflecting request for legal advice regarding "Happy Birthday to You"	David K. Sengstack (President, Summy-Birchard Co.)	Theodore Kupferman, Esq. (Kupferman & Price)		AC

EX. A

Defendants' Privilege Log (May 9, 2014)

Privilege Number	DATE	DESCRIPTION	FROM	TO	CC	TYPE
157	11/12/1964	Letter reflecting request for legal advice regarding "Happy Birthday to You"	David K. Sengstack (President, Summy-Birchard Co.)	Theodore Kupferman, Esq. (Kupferman & Price)		AC