

EXHIBIT 1

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9 *Interim Lead Counsel for Plaintiffs and the [Proposed] Class*

10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA -**
12 **WESTERN DIVISION**

13 GOOD MORNING TO YOU) Lead Case No. CV 13-04460-GHK (MRWx)
14 PRODUCTIONS CORP., *et al.*,)
15 Plaintiffs,) **NOTICE OF TAKING DEPOSITION OF**
16 v.) **THE PERSON MOST**
17) **KNOWLEDGEABLE OF DEFENDANT**
18 WARNER/CHAPPELL MUSIC,) **WARNER/CHAPPELL MUSIC, INC.**
19 INC., *et al.*)
20 Defendants.) Date: May 20, 2014
21) Time: 10:00 a.m.
22) Place: 1925 Century Park East,
Suite 2100
Los Angeles, CA 90067

1 TO: DEFENDANT WARNER/CHAPPELL MUSIC, INC. AND ITS
2 ATTORNEYS OF RECORD

3 **PLEASE TAKE NOTICE** that, pursuant to Rule 30(b)(6) of the Federal
4 Rules of Civil Procedure, Plaintiffs Good Morning To You Productions Corp.,
5 Robert Siegel, Rupa Marya, and Majar Productions, LLC (“Plaintiffs”) by their
6 attorneys, will take the deposition upon oral examination of defendant
7 Warner/Chappell, Inc. (“Warner/Chappell”), at the offices of Glancy Binkow &
8 Goldberg LLP, 1925 Century Park East, Suite 2100, Los Angeles, CA 90067, on
9 May 20, 2014, commencing at 10:00 a.m. The deposition will be recorded by
10 stenographic means and will continue from day to day until complete.

11 Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiffs
12 request Warner/Chappell to designate one or more persons most knowledgeable with
13 respect to each of the following:

14 1. Copyright applications relating to *Happy Birthday to You* including
15 work registered with copyright office as Reg No. E51988 and E51990 and
16 subsequent renewal thereof;

17 2. Basis of any claim by Warner/Chappell as to its copyright ownership for
18 *Happy Birthday to You*;

19 3. Assignment of rights to Warner/Chappell of the copyrights relating to
20 *Happy Birthday to You*;

21 4. Historical facts suggesting Patty Hill may have been involved in writing
22 lyrics to *Happy Birthday to You* in conjunction with Mildred J. Hill;

23 5. Historical facts suggesting that Mildred J. Hill or Preston Ware Orem
24 wrote the lyrics to *Happy Birthday to You*;

25 6. Facts admitted in Defendants’ Answer;

26 7. Facts denied in Defendants’ Answer; and

27 8. Facts set forth in Defendants’ Responses to Plaintiff’s First Set of
28 Interrogatories assembled by “authorized employees or agents of Warner/Chappell

1 who informed [Nathan A. Osher] that the facts as to which [Nathan A. Osher] [did]
2 not have personal knowledge are true.”

3 You are invited to attend and cross-examine.

4
5 Dated: April 23, 2014

6 Respectfully submitted,

7 **WOLF HALDENSTEIN ADLER**
8 **FREEMAN & HERZ LLP**

9 By: 

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