



EXHIBIT 2

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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., <i>et al.</i> ,)	
15	Plaintiffs,)	AMENDED NOTICE OF TAKING
16	v.)	DEPOSITION OF THE PERSON MOST
17)	KNOWLEDGEABLE OF DEFENDANT
18	WARNER/CHAPPELL MUSIC,)	WARNER/CHAPPELL MUSIC, INC.
19	INC., <i>et al.</i> ,)	PURSUANT TO FED. R. CIV. P. 30(b)(6)
20	Defendants.)	Date: June 3, 2014
21)	Time: 10:00 a.m.
22)	Place: Wolf Haldenstein Adler Freeman & Herz LLP 270 Madison Avenue New York, NY 10016

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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 Music, Inc. (“Warner/Chappell”), at the offices of Wolf
8 Haldenstein Adler Freeman & Herz LLP located at 270 Madison Avenue, New York,
9 NY 10016, telephone 212/545-4600, on June 3, 2014, commencing at 10:00 a.m.
10 The oral examination of the deponent will be recorded by stenographic means and by
11 sound and visual means will continue from day to day until complete.

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

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

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

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

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

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

26 6. Facts admitted in Defendants’ Amended Answer to Plaintiffs’ Fourth
27 Amended Complaint;

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1 7. Facts denied in Defendants' Amended Answer to Plaintiffs' Fourth
2 Amended Complaint;

3 8. Facts set forth in Defendants' Responses to Plaintiffs' First Set of
4 Interrogatories assembled by "authorized employees or agents of Warner/Chappell
5 who informed [Nathan A. Osher] that the facts as to which [Nathan A. Osher] [did]
6 not have personal knowledge are true";

7 9. Defendants' production of documents responsive to Plaintiffs' First Set
8 of Requests for Production of Documents assembled by "authorized employees or
9 agents of Warner/Chappell who informed [Nathan A. Osher] that the facts as to
10 which [Nathan A. Osher] [did] not have personal knowledge are true" on or about
11 April 11, 2014 and May 9, 2014, numbered WC000001-WC001908; and

12 10. Facts set forth in and which formed the basis of any denial or qualified
13 admission, Defendants' Responses to Plaintiffs' First and Second Set of Requests for
14 Admission assembled by "authorized employees or agents of Warner/Chappell who
15 informed [Nathan A. Osher] that the facts as to which [Nathan A. Osher] [did] not
16 have personal knowledge are true."

17 You are invited to attend and cross-examine.

18
19 Dated: May 19, 2014

Respectfully submitted,

**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP**

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21 By: Betsy C. Manifold
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WARNER/CHAPPELL 20839

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DECLARATION OF SERVICE

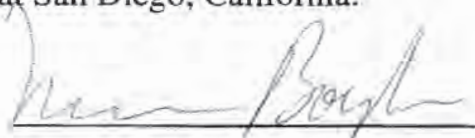
I, Marianne Boyles, the undersigned, declare:

1. That declarant is and was, at all times herein mentioned, a citizen of the United States and a resident of the County of San Diego, over the age of 18 years, and not a party to or interested in the within action; that declarant's business address is 750 B Street, Suite 2770, San Diego, California. 92101.

2. That on May 19, 2014, declarant served PLAINTIFFS' NOTICE OF TAKING DEPOSITION OF THE PERSON MOST KNOWLEDGEABLE OF DEFENDANT WARNER/CHAPPELL MUSIC, INC. by U.S. Mail and e-mail to the parties listed on the attached Service List.

3. That there is regular communication between the parties.

I declare under penalty of perjury that the foregoing is true and correct.
Executed this 19th day of May 2014, at San Diego, California.


MARIANNE BOYLES

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