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

GOOD MORNING TO YOU	)	Lead Case No. CV 13-04460-GHK (MRWx)
PRODUCTIONS CORP., <i>et al.</i> ,	)	
	)	<b>SUPPLEMENTAL DECLARATION OF</b>
Plaintiffs,	)	<b>BETSY C. MANIFOLD IN FURTHER</b>
	)	<b>SUPPORT OF PLAINTIFFS' MOTION</b>
v.	)	<b>[DKT. 123, 124] BY ORDER DATED</b>
	)	<b>JULY 9, 2014 [DKT. 119]</b>
	)	
WARNER/CHAPPELL MUSIC,	)	Date: July 25, 2014
INC., <i>et al.</i> ,	)	Time: 9:30 A.M.
	)	Judge: Hon. Michael R. Wilner
	)	Room: H-9th Floor
Defendants.	)	Disc. Cutoff: July 11, 2014
	)	Pretrial Conf.: N/A
	)	Trial Date: N/A
	)	L/D File Jt. MSJ: 11/14/14

1 I, Betsy C. Manifold, hereby declare as follows:

2 1. I am an attorney duly licensed to practice law in the States of California,  
3 New York, and Wisconsin, and before this Court. I am a partner with the law firm  
4 Wolf Haldenstein Adler Freeman & Herz LLP, interim lead class counsel for  
5 plaintiffs and the class. I have personal knowledge of the following facts, and if  
6 called upon to do so, I could and would competently testify as to them.

7 2. I submit this declaration in further support of the motion by plaintiffs  
8 Good Morning To You Productions Corp., Robert Siegel, Rupa Marya d/b/a Rupa &  
9 The April Fishes, and Majar Productions, LLC's ("Plaintiffs'") for an order: (i)  
10 overruling Defendants' claim of privilege in documents produced by a non-party, or  
11 permitting a second rule 30(B)(6) deposition to determine the factual basis for that  
12 claim, (ii) granting relief from the discovery cut-off to conduct that deposition, and  
13 (iii) and [proposed] order thereon. [Dkt. 123, 124]. Supplemental briefing was  
14 permitted by Court Order dated July 9, 2014 [Dkt. 119].

15 **SUPPLEMENTAL EXHIBITS**

16 3. Attached hereto are true and correct copies of the following:

17 Exhibit 13: Form ASCAP License Agreements for: (i) Restaurants, Bars,  
18 Nightclubs, and Similar Establishments; (ii) Shopping Centers and Shopping Malls;  
19 and (iii) Radio Station;

20 Exhibit 14: Excerpts from the Deposition of Richard Reimer (ASCAP) taken  
21 on July 21, 2014;

22 Exhibit 15: Excerpts of ASCAP Compendium of ASCAP Rules and  
23 Regulations, and Policies Supplemental to the Articles of Incorporation;

24 Exhibit 16: Excerpts from the Deposition of Richard Reimer (ASCAP) taken  
25 on July 11, 2014; and

26 Exhibit 17: True and correct copies of correspondence exchanged between  
27 ASCAP and Clayton F. Summy Co. in 1943 produced by non-party ASCAP on May  
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1 9, 2014 (ASCAP0193-197) (filed under seal in compliance with the parties'  
2 protective order and non-party's ASCAP's "Confidential" designation).

3 I declare under penalty of perjury that the foregoing is true and correct.  
4 Executed this 22nd day of July 2014, in the City of San Diego, State of California.

5 By:                   /s/ Betsy C. Manifold                    
6 BETSY C. MANIFOLD