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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,)	JOINT STIPULATION TO EXTEND
16	v.)	SCHEDULING ORDER DEADLINES;
17)	DECLARATION OF BESTY C.
18	WARNER/CHAPPELL MUSIC,)	MANIFOLD IN SUPPORT THEREOF;
19	INC., <i>et al.</i>)	AND [PROPOSED] ORDER
20	Defendants.)	GRANTING STIPULATION
21)	Room: 650
22)	Judge: Hon. George H. King, Chief
23)	Judge

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1 WHEREAS, a Scheduling Conference was held on March 24, 2014; and under
2 the March 26, 2014 Order Entering Scheduling Dates (Dkt. 92), the Court entered the
3 following deadlines on Plaintiffs' Claim One after bifurcating and staying Plaintiffs'
4 remaining state law claims:¹

5 Expert Disclosures: July 25, 2014
6 Rebuttal Expert Disclosures: August 25, 2014
7 Expert Discovery Motions Deadline: September 15, 2014
8 Expert Discovery Cut-Off: September 26, 2014
9 File Joint Status Report: September 26, 2014
10 File Joint Motion for Summary
11 Judgment: November 14, 2014;

12 WHEREAS, Plaintiffs timely served their Expert Disclosures upon Defendants
13 on July 24, 2014 (*see* Decl. of Betsy C. Manifold In Support of Stip. at 1, ¶ 3);

14 WHEREAS, Plaintiffs' designated expert, Mr. Joel Sachs, is unavailable for
15 deposition from August 11, 2014, up to and including August 25, 2014, due to a pre-
16 paid, pre-planned, trip out of the country (*id.* at ¶ 4);

17 WHEREAS, Defendants' counsel wish to depose Plaintiffs' designated expert
18 prior to the August 25th deadline to designate rebuttal experts (*id.* at ¶ 5);

19 WHEREAS, Plaintiffs' counsel also have a scheduling conflict in October and
20 have requested that the joint briefing on the parties' motion for summary judgment
21 be extended to accommodate said conflict (*id.* at ¶ 6);

22 WHEREAS, no prior extension of the foregoing deadlines has been sought by
23 the parties (*id.* at ¶ 7); and

24
25 _____
26 ¹ As used herein, "Plaintiffs" collectively refers to plaintiffs Good Morning To
27 You Productions Corp., Robert Siegel, Rupa Marya, and Major Productions, LLC,
28 and "Defendants" refers to both defendants Warner/Chappell Music, Inc. and
Summy-Birchard, Inc.

1 WHEREAS, the parties have met and conferred in good faith to accommodate
2 these scheduling conflicts and now jointly seek the Court's approval to amend the
3 Scheduling Order (Dkt. 94) as follows:

4 Rebuttal Expert Disclosures: September 15, 2014

5 Expert Discovery Motions Deadline: October 3, 2014

6 Expert Discovery Cut-Off: October 13, 2014

7 File Joint Status Report: October 13, 2014

8 File Joint Motion for Summary

9 Judgment: November 21, 2014;

10 **NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by
11 and between the parties, through the undersigned counsel, as follows:

12 1. Upon the Court's approval, the Scheduling Order (Dkt. 94) shall be
13 amended as follows:

14 Rebuttal Expert Disclosures: September 15, 2014

15 Expert Discovery Motions Deadline: October 3, 2014

16 Expert Discovery Cut-Off: October 13, 2014

17 File Joint Status Report: October 13, 2014

18 File Joint Motion for Summary

19 Judgment: November 21, 2014.

20 **IT IS SO STIPULATED.**

21 Respectfully submitted,

22 Dated: August 14, 2014

**WOLF HALDENSTEIN ADLER
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23
24 By: /s/Betsy C. Manifold

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26 *Attorneys for Plaintiffs*

27 **MUNGER TOLLES & OLSON LLP**

28 Dated: August 14, 2014

By: /s/Kelly M. Klaus

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*Attorneys for Defendants Warner/Chappell
Music, Inc. and Summy-Birchard, Inc.*

13 **DECLARATION REGARDING CONCURRENCE**

14 I, Betsy C. Manifold, am the ECF/CM User whose identification and password
15 are being used to file this **JOINT STIPULATION TO EXTEND SCHEDULING**
16 **ORDER DEADLINES; DECLARATION OF BESTY C. MANIFOLD IN**
17 **SUPPORT THEREOF; AND [PROPOSED] ORDER GRANTING**
18 **STIPULATION.** In compliance with L.R. 5-4.3.4(2)(i), I hereby attest that Kelly
19 M. Klaus has concurred in this filing's content and has authorized its filing.

20
21 DATED: August 14, 2014

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