

DECLARATION OF BETSY C. MANIFOLD

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

2. I am an attorney duly licensed to practice law in the states of Wisconsin, New York, and California, and am admitted to the bar of this Court. I am a partner at the law offices of Wolf Haldenstein Adler Freeman & Herz LLP, interim lead class counsel for plaintiffs, Good Morning To You Productions Corp., Robert Siegel, Rupa Marya d/b/a/ Rupa & The April Fishes, and Majar Productions LLC ("Plaintiffs"), in the above-captioned action. I make this declaration in support of the parties' joint stipulation to extend scheduling order deadlines and have personal knowledge of the facts stated herein. If called upon to testify as to them, I could, and would, competently do so.

3. On July 24, 2014, Plaintiffs timely served their Expert Disclosures on all parties in the action.

4. Plaintiffs' designated expert, Mr. Joel Sachs, advised counsel for Plaintiffs that he will be unavailable for deposition from August 11, 2014, up to and including August 25, 2014, due to a pre-paid, pre-planned, trip out of the country.

5. Defendants' counsel advised that they wish to depose Mr. Sachs prior to the August 25th deadline to designate rebuttal experts imposed by the Court's Scheduling Order (Dkt. 92).

6. Plaintiffs' counsel has an unavoidable scheduling conflict in October and Defendants' counsel agreed to extend the joint briefing on the parties' motion for summary judgment to accommodate said conflict subject to the Court's approval.

7. No prior extension of the following deadlines has been sought by any party and as such, the parties met and conferred in good faith to agree upon the following extension of dates imposed under the Court's Scheduling Order (Dkt. 92):

Rebuttal Expert Disclosures: September 15, 2014

Expert Discovery Motions Deadline: October 3, 2014

Expert Discovery Cut-Off: October 13, 2014

1 File Joint Status Report: October 13, 2014

2 File Joint Motion for Summary

3 Judgment: November 21, 2014.

4 8. For the foregoing reasons, Plaintiffs have shown good cause for the
5 brief extension to the Scheduling Order deadlines, and respectfully request the Court
6 enter an amended scheduling order based upon the parties' proposed dates in their
7 joint stipulation submitted concurrently herewith.

8 I declare under penalty of perjury that the foregoing is true and correct.
9 Executed this 14th day of August 2014, in San Diego, California.

10 /s/Betsy C. Manifold

11 BETSY C. MANIFOLD