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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, one prior extension of approximately two weeks from the
13 foregoing deadlines had been sought by the parties to accommodate counsel's
14 scheduling conflicts; and

15 WHEREAS, the Court granted the parties' prior Joint Stipulation to Extend the
16 Scheduling Deadlines (Dkt. 152) as follows:

17 Rebuttal Expert Disclosures: September 15, 2014
18 Expert Discovery Motions Deadline: October 3, 2014
19 Expert Discovery Cut-Off: October 13, 2014
20 File Joint Status Report: October 13, 2014
21 File Joint Motion for Summary
22 Judgment: November 21, 2014;

23 WHEREAS, pursuant to the Court's March 24, 2014 Order Re: Summary
24 Judgment (Dkt. 93), the parties held their Local Rule 7-3 Conference on October 30,

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

1 2014 and have been working diligently to create a single fully integrated joint brief
2 covering all parties' summary judgment motions.

3 WHEREAS, the parties agree that they require an additional four days to
4 properly complete this process and request an extension of the filing deadline from
5 November 21, 2014 to November 25, 2014.

6 WHEREAS, the parties met and conferred in good faith and agreed to notice
7 the summary judgment motions for January 26, 2015;

8 WHEREAS, in light of the January 26th hearing date, an extension of the filing
9 date for the motions for summary judgment by four days still allows the Court ample
10 opportunity to review the motions for summary judgment and determine whether it
11 wishes to hear oral argument on January 26th.

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

14 1. Upon the Court's approval, the Scheduling Order (Dkt. 93) and Order
15 Granting Joint Stipulation to Extend the Scheduling Deadlines (Dkt. 152) shall be
16 amended as follows:

17 File Joint Motion for Summary

18 Judgment: November 25, 2014.

19 **IT IS SO STIPULATED.**

20 Respectfully submitted,

21 Dated: November 19, 2014

**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP**

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23 By: /s/ Betsy C. Manifold
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Dated: November 19, 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: November 19, 2014

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

1 File Joint Motion for Summary

2 Judgment: November 25, 2014.

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

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

9 /s/ Betsy C. Manifold

10 BETSY C. MANIFOLD