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14	Attorneys for Defendants Warner/Chapp	ell Music, Inc		
15	and Summy-Birchard, Inc.			
16	UNITED STATES DISTRICT COURT			
17	CENTRAL DISTRICT OF CALIFORNIA -			
		N DIVISION		
18 19	GOOD MORNING TO YOU PRODUCTIONS CORP., <i>et al.</i> ,		V 13-04460-GHK (MRWx)	
20	Plaintiffs,	CORRECT	TICE OF ERRATAS AND FIONS ON CROSS- SEOD SUMMADY	
21	V		S FOR SUMMARY NT AND RELATED	
22	WARNER/CHAPPELL MUSIC,	DOCUME	NTS [ECF NOS. 174, 180 & D [PROPOSED] ORDER	
23	INC., <i>et al.</i> ,	Data	January 26, 2015	
24	Defendants.	Date: Time:	January 26, 2015 9:30 A.M.	
25		Judge:	Hon. George H. King, Chief	
26		Doom	Judge 650	
27	/	Room:	VUV	
28				
20		1		
	-	1 -		
			Dockets.Justi	

THE COURT, ALL PARTIES AND THEIR RESPECTIVE TO **ATTORNEYS OF RECORD:** 2

PLEASE TAKE NOTICE that Plaintiffs and Defendants hereby jointly provide the following notice of erratas and corrections as described in detail below.

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CROSS-MOTIONS FOR SUMMARY JUDGMENT & RELATED **DOCUMENTS**

On November 25, 2014, pursuant to the Court's Order Granting Joint 7 Stipulation To Extend Scheduling Deadlines (Dkt. 166, Nov. 20, 2014), Plaintiffs' 8 counsel, on behalf of all parties, electronically filed the following documents as 9 required by Court's Order on Motions for Summary Judgment (Dkt. 93, Mar. 24, 2014):

- a) [Redacted] Joint Evidentiary Appendix, Volumes 1 through 8-Volume 1 (Dkt. 170), Volume 2 (Dkt. 171), Volume 3 (Dkt. 172), Volume 4 (Dkt. 173), Volume 5 (Dkt. 174), Volume 6 (Dkt. 176), Volume 7 (Dkt. 177), and Volume 8 (Dkt. 178).
- b) Notice of Cross-Motion and Cross-Motion for Summary Judgment for Declaratory Judgment; [Proposed] Order Granting Plaintiffs' Motion for Summary Judgment; and [Proposed] Order Granting Defendants' Motion for Summary Judgment (Dkt. 179);
 - c) Joint Statement of Uncontroverted Facts in Support of Cross-Motion for Summary Judgment as to Declaratory Judgment (Dkt. 180); and
 - d) Cross-Motions for Summary Judgment (Dkt. 181).

II. **NOTICES OF ERRATA AND CORRECTIONS** 23

1) Volume 5 of 8 of the Joint Evidentiary Appendix, originally docketed as ECF No. 174, did not contain all the correct exhibits and was corrected immediately by ECF No. 175. The parties respectfully request that

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Corrected Volume 5 of 8 (ECF No. 174) supersede and replace ECF No. 174;

- 2) With respect to the original Cross-Motions for Summary Judgment docketed as ECF No. <u>181</u>, the parties recognized that the filed document inadvertently lacked the requisite joint signatures of counsel and immediately filed an Amendment to Cross-Motions for Summary Judgment as to Declaratory Judgment "*CORRECTING ECF NO. 181*," docketed as ECF No. <u>182</u>. The parties respectfully request that ECF No. <u>182</u> supersede and replace ECF No. <u>181</u>.
- 3) With respect to the original Joint Statement of Uncontroverted Facts in Support of Cross-Motions for Summary Judgment as to Declaratory Judgment docketed as ECF No. <u>180</u>, the parties discovered shortly after filing that during the final approval exchanges of counsel, a prior, unapproved version of this document was mistakenly filed. The parties met and conferred extensively and jointly submitted a [*Corrected*] Joint Statement of Uncontroverted Facts, docketed as ECF No. <u>183</u>. The parties respectfully request ECF No. <u>183</u> supersede and replace ECF No. <u>180</u>.
- 9 III. <u>CONCLUSION</u>

The parties respectfully request that the foregoing notice of erratas and corrections be adopted by the Court as stated.

Respectfully submitted,

Dated: December 4, 2014

WOLF HALDENSTEIN ADLER FREEMAN & HERZ LLP

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

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1	DECLARATION REGARDING CONCURRENCE
2	I, Betsy C. Manifold, am the ECF User whose identification and password are
3	being used to file this JOINT NOTICE OF ERRATAS AND CORRECTIONS ON
4	CROSS-MOTIONS FOR SUMMARY JUDGMENT AND RELATED
5	DOCUMENTS [ECF NOS. 174, 180 & 181]. In compliance with Civil Local Rule
6	5-4.3.4(a)(2), I hereby attest that Kelly M. Klaus has concurred in this filing.
7	Executed this 4th day of December 2014, in the City of San Diego, State of
8	California.
9	By: <u>/s/Betsy C. Manifold</u> BETSY C. MANIFOLD
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