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17 **UNITED STATES DISTRICT COURT**

18 **CENTRAL DISTRICT OF CALIFORNIA**

19 **WESTERN DIVISION**

20 GOOD MORNING TO YOU) Lead Case No. CV 13-04460-GHK (MRWx)
21 PRODUCTIONS CORP., *et al.*,)

22) **JOINT NOTICE RE: DEPOSITION**
23) **TRANSCRIPT(S) PURSUANT TO L.R.**
24) **32-1**

25 v.)

26 WARNER/CHAPPELL MUSIC,) Date: February 9, 2015
27 INC., *et al.*,) Time: 9:30 a.m.

28) Room: 650
29 Defendants.) Judge: Hon. George H. King,
30) Chief Judge

1 **TO THE HONORABLE COURT, ALL PARTIES, AND THEIR**
2 **COUNSEL, PLEASE TAKE NOTICE** that Plaintiffs Rupa Marya, Robert Siegel, and
3 Good Morning To You Productions Corp. and Majar Productions, LLC (“Plaintiffs”)
4 and Defendants Warner/Chappell Music, Inc. and Summy-Birchard, Inc. (“Defendants”)
5 in the above-captioned matter, by and through their counsel, notify the Court pursuant to
6 L.R. 32-1 that the deposition transcripts to be relied upon at the hearing on the Cross-
7 Motions for Summary Judgment and/or Plaintiffs’ Motion to Exclude Evidence (Dkts.
8 182, 197) are attached to the following documents previously filed with the Court:

9 Amended Joint Evidentiary Appendix in Support of Notice of Cross-Motions and
10 Cross-Motions for Summary Judgment Filed Pursuant to Court’s Dec. 5, 2014 Order
11 [Dkts. 187-194] (“Joint Appendix”):

- 12 • **Dkt. 189-3 at 33-50 (Ex. 47), Dkt. 192-1 at 27-56 (Ex. 107):** The relevant
13 excerpts of the deposition transcript of Defendants’ Warner/Chappell
14 Music, Inc.’s designated Fed. R. Civ. P. 30(b)(6) deponent, Thomas B.
15 Marcotullio, taken on June 9, 2014.
- 16 • **Dkt. 193-1 at 6-25 (Ex. 109):** The relevant excerpts of the deposition
17 transcript of Jeremy Blietz, Vice President, Administration,
18 Warner/Chappell Music, Inc., taken on July 10, 2014.
- 19 • **Dkt. 190-1 at 60-80 and Dkt. 190-2 at 1-12 (Ex. 64), Dkt. 193-1 at 26-83**
20 **(Ex. 110), Dkt. 193-2 (Ex. 111):** The relevant excerpts of the deposition
21 transcript of Joel Sachs, Ph.D., taken on September 9, 2014.
- 22 • **Dkt. 191-1 at 52-94 (Ex. 87):** The relevant excerpts of the deposition
23 transcript *de benne esse* of Patty S. Hill and Jessica Hill, taken July 1,
24 1935, filed in *Hill v. Harris*, Eq. No. 78-350 (P002756-2797).

25 Declaration of Betsy C. Manifold in Support of Plaintiffs’ Notice of Motion and
26 Motion to Exclude Evidence [Dkt. 198] (“Manifold Decl.”).

- 27 • **Dkt. 198-1 at 2-19:** The relevant excerpts of the deposition transcript of
28 Defendants’ Warner/Chappell Music, Inc.’s designated Fed. R. Civ. P.

1 30(b)(6) deponent, Thomas B. Marcotullio, taken on June 9, 2014.

- 2 • **Dkt. 198-1 at 21-36:** The relevant excerpts of the deposition transcript of
3 Jeremy Blietz, Vice President, Administration, Warner/Chappell Music,
4 Inc., taken on July 10, 2014.

5
6 Pursuant to L.R. 16-2.7, the questions and answers in Exhibits 109 and 110 to the
7 Joint Appendix and in Exhibits A and B to the Manifold Decl. on which the parties may
8 rely at the February 9, 2015, hearing on the Cross-Motions for Summary Judgment
9 and/or Plaintiffs' Motion To Exclude Evidence are marked by the parties. The original
10 depositions not lodged at this time shall be brought to Court by the attorneys in custody
11 of the same on the day of the hearing.

12
13 Respectfully submitted,

14 Dated: January 30, 2015

**WOLF HALDENSTEIN ADLER
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15
16 By: /s/ Betsy C. Manifold
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24 Dated: January 30, 2015

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11 *Music, Inc. and Summy-Birchard, Inc.*

12 **DECLARATION REGARDING CONCURRENCE**

13 I, Betsy C. Manifold, am the CM/ECF User whose identification and password
14 are being used to file this **JOINT NOTICE RE: DEPOSITION TRANSCRIPT(S)**
15 **PURSUANT TO L.R. 32-1**. In compliance with L.R. 5-4.3.4(2)(i), I hereby attest that
16 Kelly M. Klaus has concurred in this filing's content and has authorized its filing.

17 DATED: January 30, 2015

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

20 WARNERCHAPPELL:21529.joint.notice.lodging