

Exhibit B

Ex. B

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1 FRANCIS M. GREGOREK (144785)
gregorek@whafh.com
2 BETSY C. MANIFOLD (182450)
manifold@whafh.com
3 RACHELE R. RICKERT (190634)
rickert@whafh.com
4 MARISA C. LIVESAY (223247)
livesay@whafh.com
5 **WOLF HALDENSTEIN ADLER**
FREEMAN & HERZ LLP
6 750 B Street, Suite 2770
San Diego, CA 92101
7 Telephone: 619/239-4599
8 Facsimile: 619/234-4599

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MAY 22 2014

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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., *et al.*,)
15 Plaintiffs,) **PLAINTIFFS' SECOND NOTICE OF**
16 v.) **TAKING DEPOSITION OF THE**
17) **PERSON MOST KNOWLEDGEABLE**
18 WARNER/CHAPPELL MUSIC,) **OF DEFENDANT**
19 INC., *et al.*,) **WARNER/CHAPPELL MUSIC, INC.**
20 Defendants.) **PURSUANT TO FED. R. CIV. P. 30(b)(6)**
21) **Date: June 13, 2014**
22) **Time: 10:00 a.m.**
23) **Place: Glancy Binkow & Goldberg**
24) **LLP**
25) **1925 Century Park East,**
26) **Suite 2100**
27) **Los Angeles, CA 90067**
28

1 **TO DEFENDANT WARNER/CHAPPELL MUSIC, INC. AND ITS**
2 **ATTORNEYS OF RECORD:**

3 **PLEASE TAKE NOTICE** that, pursuant to Rule 30(b)(6) of the Federal
4 Rules of Civil Procedure, Plaintiffs Good Morning To You Productions Corp.,
5 Robert Siegel, Rupa Marya, and Major Productions, LLC (“Plaintiffs”), by their
6 attorneys, will take the deposition upon oral examination of defendant
7 Warner/Chappell Music, Inc. (“Warner/Chappell”), at the offices of Glancy Binkow
8 & Goldberg LLP, 1925 Century Park East, Suite 2100, Los Angeles, CA 90067,
9 telephone 310/201-9150, on June 13, 2014, commencing at 10:00 a.m. The oral
10 examination of the deponent will be recorded by stenographic and will continue from
11 day to day until complete.

12 Specifically, Plaintiffs request Warner/Chappell to designate one or more
13 persons most knowledgeable with respect to each of the following categories
14 pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure:

15 1. The circumstances surrounding the original preparation of the
16 documents produced by ASCAP pursuant to Plaintiffs’ Subpoena dated March 28,
17 2014, bearing document numbers ASCAP0094-117, ASCAP 0130, ASCAP 0132,
18 ASCAP0133, ASCAP0182-184, and ASCAP 0234-245;

19 2. The basis of any claim by Warner/Chappell that any of the documents
20 identified in No. 1 above are privileged or otherwise protected from disclosure;

21 3. How and why the documents identified in No. 1 above were in the
22 possession of ASCAP;

23 4. Why the documents identified in No. 1 above are not in the possession
24 of Warner/Chappell;

25 5. The relationship(s), if any, between or among Summy-Birchard Music,
26 Summy-Birchard Company, ASCAP, and Coudert Brothers in the period from 1974
27 through 1979; and
28

1 6. The services provided by ASCAP to or for Summy-Birchard Music or
2 Summy-Birchard Company during the period from 1974 through 1979.

3 You are invited to attend and cross-examine.

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5 Dated: May 22, 2014

Respectfully submitted,

**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP**

7 By: Betsy C. Manifold
8 BETSY C. MANIFOLD

9 FRANCIS M. GREGOREK

10 gregorek@whafh.com

11 BETSY C. MANIFOLD

12 manifold@whafh.com

13 RACHELE R. RICKERT

14 rickert@whafh.com

15 MARISA C. LIVESAY

16 livesay@whafh.com

17 750 B Street, Suite 2770

18 San Diego, CA 92101

19 Telephone: 619/239-4599

20 Facsimile: 619/234-4599

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28 WARNER/CHAPPELL 20862

COUNSEL FOR PLAINTIFFS:

Francis M. Gregorek
Betsy C. Manifold
Rachele R. Rickert
Marisa C. Livesay
WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP
750 B Street, Suite 2770
San Diego, CA 92101
619/239-4599
619/234-4599 (fax)
gregorek@whafh.com
manifold@whafh.com
rickert@whafh.com
livesay@whafh.com

Mark C. Rifkin
Janine Pollack
Beth A. Landes
Giti Baghban
WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP
270 Madison Avenue
New York, NY 10016
212/545-4600
212/545-4753 (fax)
rifkin@whafh.com
pollack@whafh.com
landes@whafh.com
baghban@whafh.com

William R. Hill
Andrew S. MacKay
Daniel J. Schacht
DONAHUE FITZGERALD LLP
1999 Harrison St., 25th Floor
Oakland, CA 94612-3520
510/451-0544
510/832-1486 (fax)
rock@donahue.com
andrew@donahue.com
daniel@donahue.com

Randall S. Newman
RANDALL S. NEWMAN PC
37 Wall Street, Penthouse D
New York, NY 10005
212/797-3737
212/797-3172 (fax)
rsn@randallnewman.net

GLANCY BINKOW &
GOLDBERG LLP
Lionel Z. Glancy (134180)
Marc L. Godino (188669)
1925 Century Park East, Suite 2100
Los Angeles, CA 90067
310/201-9150
310/201-9160 (fax)
lglancy@glancylaw.com
mgodino@glancylaw.com

Alison C. Gibbs (257526)
Omel A. Nieves (134444)
Kathlynn E. Smith (234541)
HUNT ORTMANN PALFFY NIEVES
DARLING & MAH, INC.
301 North Lake Avenue, 7th Floor
Pasadena, CA 91101
626/440-5200
626/796-0107 (fax)
gibbs@huntortmann.com
nieves@huntortmann.com
smith@huntortmann.com

*Attorneys for Plaintiffs Good Morning
To You Productions Corp., Robert
Siegel, Rupa Marya, and Majar
Productions, LLC*

Kelly M. Klaus
Adam I. Kaplan
MUNGER TOLLES & OLSON LLP
560 Mission St., 27th Floor
San Francisco, CA 94105
415/512-4000
kelly.klaus@mto.com
adam.kaplan@mto.com

Glen Pomerantz
MUNGER TOLLES & OLSON LLP
355 South Grand Ave., 35th Floor
Los Angeles, CA 90071
213/683-9100
213/687-3702 (fax)
glenn.pomerantz@mto.com

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

COUNSEL FOR DEFENDANTS:

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