

Exhibit C

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9

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION
12

13 GOOD MORNING TO YOU
PRODUCTIONS CORP.; et al.,

14 Plaintiffs,

15 v.

16 WARNER/CHAPPELL MUSIC, INC.,
17 et al.,

18 Defendants.
19

Lead Case No. CV 13-04460-GHK
(MRWx)

**DEFENDANT'S OBJECTIONS TO
PLAINTIFFS' AMENDED NOTICE
OF TAKING DEPOSITION OF THE
PERSON MOST
KNOWLEDGEABLE OF
DEFENDANT
WARNER/CHAPPELL MUSIC,
INC.**

1 Pursuant to Federal Rule of Civil Procedure (“Rule”) 30(b)(6),
2 Defendant Warner/Chappell Music, Inc. (“Warner/Chappell”) hereby objects and
3 responds to Plaintiffs’ Amended Notice of Taking Deposition of the Person Most
4 Knowledgeable of Defendant Warner/Chappell Music, Inc., served on May 19,
5 2014.

6 **GENERAL OBJECTIONS**

7 The following General Objections are incorporated by reference into
8 each response to each topic of examination, whether or not such General Objections
9 are expressly incorporated by reference in such response.

10 1. Warner/Chappell objects to the deposition notice and to each and every
11 topic of examination listed therein, to the extent they purport to impose on
12 Warner/Chappell any obligation that is different from or greater than any imposed
13 by the Federal Rules of Civil Procedure, the Local Rules of the United States
14 District Court for the Central District of California, or any other applicable law, rule
15 or order.

16 2. Warner/Chappell objects to the deposition notice and to each and every
17 topic of examination listed therein, to the extent the notice purports to require
18 Warner/Chappell to produce the person “most knowledgeable” as to each or any
19 topic. Pursuant to Rule 30(b)(6)(6), Warner/Chappell will designate a corporate
20 representative(s) who consents to testify on its behalf “about information known or
21 reasonably available to the organization.”

22 3. Warner/Chappell objects to the deposition notice and to each and every
23 topic of examination listed therein that contains the undefined term “*Happy*
24 *Birthday to You*” as vague and ambiguous. Warner/Chappell’s construes “*Happy*
25 *Birthday to You*” to mean the works copyrighted under copyright registration
26 certificates E51988 or E51990 and timely renewed.

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1 4. Warner/Chappell objects to the deposition notice and to each and every
2 topic of examination listed therein, to the extent that they are excessive, unduly
3 burdensome and/or intended to harass.

4 5. Warner/Chappell objects to the deposition notice, and to each and every
5 topic of examination listed therein, as so general, wide ranging, and directed to
6 matters more properly addressed by document discovery or other means that they
7 are as a whole excessive and abusive.

8 6. Warner/Chappell objects to the deposition notice and to each and every
9 topic of examination listed therein, to the extent that they do not describe with
10 reasonable particularity the matters on which examination is requested as required
11 by Rule 30(b)(6) of the Federal Rules of Civil Procedure.

12 7. Warner/Chappell objects to the deposition notice and to each and every
13 topic of examination listed therein, to the extent they employ terms or phrases that
14 are overbroad, vague or ambiguous.

15 8. Warner/Chappell objects to the deposition notice and to each and every
16 topic of examination listed therein, to the extent that they seek information that is
17 not relevant to the subject matter of this action, is not reasonably calculated to lead
18 to the discovery of admissible evidence, and/or are lacking in the reasonable
19 particularity required by law.

20 9. Warner/Chappell objects to the deposition notice, and to each and every
21 topic of examination listed therein, to the extent they seek information protected by
22 the attorney-client privilege, the attorney work-product doctrine, or any other
23 privilege or protection from disclosure. Warner/Chappell intends to and does claim
24 all such privileges and protections, and any inadvertent disclosure of privileged or
25 protected information shall not give rise to a waiver of any such privilege or
26 protection. Furthermore, Warner/Chappell will not designate any witness, and any
27 witness that Warner/Chappell produces will not be prepared to discuss and will not
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1 testify to, any information protected by the attorney-client privilege, the attorney
2 work-product doctrine, or any other privilege or protection from disclosure.

3 10. Warner/Chappell objects to the deposition notice, and to each and every
4 topic of examination listed therein, to the extent they seek information not in
5 Warner/Chappell's possession, custody, or control; or information that is publicly
6 available or equally available to Plaintiff; or information that could be derived or
7 ascertained by Plaintiff with substantially the same effort that would be required of
8 Warner/Chappell or from sources that are more convenient, less burdensome, less
9 expensive, or more readily available to Plaintiff than to Warner/Chappell.

10 11. Warner/Chappell objects to the deposition notice, and to each and every
11 topic of examination listed therein, to the extent that they seek discovery of
12 confidential, trade secret, proprietary, financial, or commercially sensitive
13 information, and/or the disclosure of documents and information protected by
14 statutory, constitutional and/or common law privacy rights, including any right to
15 privacy under any applicable state or federal law, client information, and/or
16 information that the Warner/Chappell is obligated to maintain as confidential.

17 12. Warner/Chappell objects to the deposition notice, and to each and every
18 topic of examination listed therein, to the extent they seek testimony regarding the
19 legal basis for Warner/Chappell's contentions or allegations, as these are not the
20 appropriate subject for deposition discovery.

21 13. Warner/Chappell objects to each topic of examination to the extent that
22 it seeks legal conclusions or contentions, the application of law to fact, or expert
23 analyses.

24 14. Warner/Chappell objects to each topic of examination to the extent that
25 it is cumulative and duplicative of written discovery already served by Plaintiffs.

26 15. Warner/Chappell objects to the noticed time and place, and will meet
27 and confer with Plaintiffs to determine a mutually agreeable and convenient time
28 and location for the deposition.

1 16. These General Objections are incorporated below into each response to
2 each topic of examination without further reference.

3 **TOPIC NO. 1:**

4 Copyright applications relating to *Happy Birthday to You* including
5 work registered with copyright office as Reg No. E51988 and E51990 and
6 subsequent renewal thereof.

7 **RESPONSE TO TOPIC NO. 1:**

8 Warner/Chappell incorporates its General Objections.
9 Warner/Chappell specifically objects to this topic of examination to the extent that it
10 is vague and ambiguous, including in its use of the undefined term *Happy Birthday*
11 *to You*, which Warner/Chappell construes as defined in General Objection 3, above.
12 Warner/Chappell objects to this topic to the extent it purports to require
13 Warner/Chappell to produce a witness to testify about any information protected by
14 the attorney-client privilege, the attorney work-product doctrine, or any other
15 privilege or protection from disclosure. Warner/Chappell also objects to this topic
16 of examination to the extent that it is overbroad, compound and unduly burdensome.
17 Warner/Chappell also objects to this topic of examination to the extent that it does
18 not describe with reasonable particularity the matters on which examination is
19 requested as required by Rule 30(b)(6) of the Federal Rules of Civil Procedure.

20 Subject to and without waiving the foregoing objections, and subject to
21 the foregoing construction, Warner/Chappell responds as follows: Warner/Chappell
22 will produce a witness to testify regarding non-privileged information reasonably
23 available to Warner/Chappell regarding the applications, certificates of registration,
24 renewal applications, and certificates of renewal for Reg No. E51988 and E51990.

25 **TOPIC NO. 2:**

26 Basis of any claim by Warner/Chappell as to its copyright ownership
27 for *Happy Birthday to You*.
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1 **RESPONSE TO TOPIC NO. 2:**

2 Warner/Chappell incorporates its General Objections.
3 Warner/Chappell specifically objects to this topic of examination to the extent that it
4 is vague and ambiguous, including in its use of the undefined term *Happy Birthday*
5 *to You*, which Warner/Chappell construes as defined in General Objection 3, above.
6 Warner/Chappell objects to this topic to the extent it purports to require
7 Warner/Chappell to produce a witness to testify about any information protected by
8 the attorney-client privilege, the attorney work-product doctrine, or any other
9 privilege or protection from disclosure. Warner/Chappell also objects to this topic
10 of examination to the extent that it is overbroad, compound and unduly burdensome.
11 Warner/Chappell also objects to this topic of examination to the extent that it does
12 not describe with reasonable particularity the matters on which examination is
13 requested as required by Rule 30(b)(6) of the Federal Rules of Civil Procedure.

14 Subject to and without waiving the foregoing objections, and subject to
15 the foregoing construction, Warner/Chappell responds as follows: Warner/Chappell
16 will produce a witness to testify regarding non-privileged information reasonably
17 available to Warner/Chappell regarding the certificates of registration and
18 certificates of renewal for Reg No. E51988 and E51990, and the fact of
19 Warner/Chappell's acquisition of the same.

20 **TOPIC NO. 3:**

21 Assignment of rights to Warner/Chappell of the copyrights relating to
22 *Happy Birthday to You*.

23 **RESPONSE TO TOPIC NO. 3:**

24 Warner/Chappell incorporates its General Objections.
25 Warner/Chappell specifically objects to this topic of examination to the extent that it
26 is vague and ambiguous, including in its use of the undefined term *Happy Birthday*
27 *to You*, which Warner/Chappell construes as defined in General Objection 3, above.
28 Warner/Chappell objects to this topic to the extent it purports to require

1 Warner/Chappell to produce a witness to testify about any information protected by
2 the attorney-client privilege, the attorney work-product doctrine, or any other
3 privilege or protection from disclosure. Warner/Chappell also objects to this topic
4 of examination to the extent that it is overbroad, compound and unduly burdensome.
5 Warner/Chappell also objects to this topic of examination to the extent that it does
6 not describe with reasonable particularity the matters on which examination is
7 requested as required by Rule 30(b)(6) of the Federal Rules of Civil Procedure.

8 Subject to and without waiving the foregoing objections, and subject to
9 the foregoing construction, Warner/Chappell responds as follows: Warner/Chappell
10 will produce a witness to testify regarding non-privileged information reasonably
11 available to Warner/Chappell regarding the certificates of registration and
12 certificates of renewal for Reg No. E51988 and E51990, and the fact of
13 Warner/Chappell's acquisition of the same.

14 **TOPIC NO. 4:**

15 Historical facts suggesting Patty Hill may have been involved in
16 writing lyrics to *Happy Birthday to You* in conjunction with Mildred J. Hill.

17 **RESPONSE TO TOPIC NO. 4:**

18 Warner/Chappell incorporates its General Objections.
19 Warner/Chappell specifically objects to this topic of examination to the extent that it
20 is vague and ambiguous, including in its use of the undefined term *Happy Birthday*
21 *to You*, which Warner/Chappell construes as defined in General Objection 3, above.
22 Warner/Chappell objects to this topic to the extent it purports to require
23 Warner/Chappell to produce a witness to testify about any information protected by
24 the attorney-client privilege, the attorney work-product doctrine, or any other
25 privilege or protection from disclosure. Warner/Chappell also objects to this topic
26 of examination to the extent that it is overbroad, compound and unduly burdensome.
27 Warner/Chappell also objects to this topic of examination to the extent that it does
28

1 not describe with reasonable particularity the matters on which examination is
2 requested as required by Rule 30(b)(6) of the Federal Rules of Civil Procedure.

3 Subject to and without waiving the foregoing objections, and subject to
4 the foregoing construction, Warner/Chappell responds as follows: Warner/Chappell
5 will produce a witness to testify regarding non-privileged information reasonably
6 available to Warner/Chappell regarding facts known to Warner/Chappell regarding
7 the possibility that Patty Hill may have been involved in writing lyrics to *Happy*
8 *Birthday to You*, as defined in General Objection 3, above, in conjunction with
9 Mildred J. Hill.

10 **TOPIC NO. 5:**

11 Historical facts suggesting that Mildred J. Hill or Preston Ware Orem
12 wrote the lyrics to *Happy Birthday to You*.

13 **RESPONSE TO TOPIC NO. 5:**

14 Warner/Chappell incorporates its General Objections.
15 Warner/Chappell specifically objects to this topic of examination to the extent that it
16 is vague and ambiguous, including in its use of the undefined term *Happy Birthday*
17 *to You*, which Warner/Chappell construes as defined in General Objection 3, above.
18 Warner/Chappell objects to this topic to the extent it purports to require
19 Warner/Chappell to produce a witness to testify about any information protected by
20 the attorney-client privilege, the attorney work-product doctrine, or any other
21 privilege or protection from disclosure. Warner/Chappell also objects to this topic
22 of examination to the extent that it is overbroad, compound and unduly burdensome.
23 Warner/Chappell also objects to this topic of examination to the extent that it does
24 not describe with reasonable particularity the matters on which examination is
25 requested as required by Rule 30(b)(6) of the Federal Rules of Civil Procedure.

26 Subject to and without waiving the foregoing objections, and subject to
27 the foregoing construction, Warner/Chappell responds as follows: Warner/Chappell
28 will produce a witness to testify regarding non-privileged information reasonably

1 available to Warner/Chappell regarding the facts known to Warner/Chappell
2 evidencing that that Mildred J. Hill or Preston Ware Orem wrote the lyrics to *Happy*
3 *Birthday to You*, as defined in General Objection 3, above.

4 **TOPIC NO. 6:**

5 Facts admitted in Defendants' Amended Answer to Plaintiffs' Fourth
6 Amended Complaint.

7 **RESPONSE TO TOPIC NO. 6:**

8 Warner/Chappell incorporates its General Objections.
9 Warner/Chappell specifically objects to this topic of examination to the extent that it
10 seeks Warner/Chappell's contentions and/or legal theories. Warner/Chappell objects
11 to this topic to the extent it purports to require Warner/Chappell to produce a
12 witness to testify about any information protected by the attorney-client privilege,
13 the attorney work-product doctrine, or any other privilege or protection from
14 disclosure. Warner/Chappell also objects to this topic of examination on the ground
15 that it is vague, ambiguous, overbroad, unduly burdensome, and/or intended to
16 harass. Warner/Chappell also objects to this topic of examination on the ground that
17 it does not describe with reasonable particularity the matters on which examination
18 is requested as required by Rule 30(b)(6) of the Federal Rules of Civil Procedure.
19 Claim One of Plaintiffs' Fourth Amended Complaint contains hundreds of
20 allegations, and Warner/Chappell's Amended Answer to Plaintiffs' Fourth
21 Amended Complaint admits a number of these allegations. Warner/Chappell will
22 not designate a witness to testify in response to this patently overbroad and
23 undefined topic.

24 **TOPIC NO. 7:**

25 Facts denied in Defendants' Amended Answer to Plaintiffs' Fourth
26 Amended Complaint.

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1 **RESPONSE TO TOPIC NO. 7:**

2 Warner/Chappell incorporates its General Objections.
3 Warner/Chappell specifically objects to this topic of examination to the extent that it
4 seeks Warner/Chappell's contentions and/or legal theories. Warner/Chappell
5 objects to this topic to the extent it purports to require Warner/Chappell to produce a
6 witness to testify about any information protected by the attorney-client privilege,
7 the attorney work-product doctrine, or any other privilege or protection from
8 disclosure. Warner/Chappell also objects to this topic of examination on the ground
9 that it is vague, ambiguous, overbroad, unduly burdensome, and/or intended to
10 harass. Warner/Chappell also objects to this topic of examination on the ground that
11 it does not describe with reasonable particularity the matters on which examination
12 is requested as required by Rule 30(b)(6) of the Federal Rules of Civil Procedure.
13 Claim One of Plaintiffs' Fourth Amended Complaint contains hundreds of
14 allegations, and Warner/Chappell's Amended Answer to Plaintiffs' Fourth
15 Amended Complaint denies many of these allegations. Warner/Chappell will not
16 designate a witness to testify on this patently overbroad and undefined topic.

17 **TOPIC NO. 8:**

18 Facts set forth in Defendants' Responses to Plaintiffs First Set of
19 Interrogatories assembled by "authorized employees or agents of Warner/Chappell
20 who informed [Nathan A. Osher] that the facts as to which [Nathan A. Osher] [did]
21 not have personal knowledge are true."

22 **RESPONSE TO TOPIC NO. 8:**

23 Warner/Chappell incorporates its General Objections.
24 Warner/Chappell specifically objects to this topic of examination to the extent that it
25 seeks Warner/Chappell's contentions and/or legal theories. Warner/Chappell objects
26 to this topic to the extent it purports to require Warner/Chappell to produce a
27 witness to testify about any information protected by the attorney-client privilege,
28 the attorney work-product doctrine, or any other privilege or protection from

1 disclosure. Warner/Chappell also objects to this topic of examination on the
2 ground that it is vague, ambiguous, and unintelligible. Warner/Chappell also objects
3 to this topic of examination on the ground that it is overbroad, unduly burdensome,
4 and/or intended to harass. Warner/Chappell also objects to this topic of examination
5 to the extent that it does not describe with reasonable particularity the matters on
6 which examination is requested as required by Rule 30(b)(6) of the Federal Rules of
7 Civil Procedure.

8 Subject to and without waiving the foregoing objections,
9 Warner/Chappell responds as follows: Warner/Chappell will produce a witness to
10 testify regarding non-privileged information reasonably available to
11 Warner/Chappell regarding facts known to Warner/Chappell as stated in response to
12 Plaintiffs First Set of Interrogatories.

13 **TOPIC NO. 9:**

14 Defendants' production of documents responsive to Plaintiffs' First Set
15 of Requests for Production of Documents assembled by "authorized employees or
16 agents of Warner/Chappell who informed [Nathan A. Osher] that the facts as to
17 which [Nathan A. Osher] [did] not have personal knowledge are true" on or about
18 April 11, 2014 and May 9, 2014, numbered WC000001-WC001908.

19 **RESPONSE TO TOPIC NO. 9:**

20 Warner/Chappell incorporates its General Objections.
21 Warner/Chappell specifically objects to this topic of examination to the extent that it
22 seeks Warner/Chappell's contentions and/or legal theories. Warner/Chappell
23 objects to this topic to the extent it purports to require Warner/Chappell to produce a
24 witness to testify about any information protected by the attorney-client privilege,
25 the attorney work-product doctrine, or any other privilege or protection from
26 disclosure. Warner/Chappell also objects to this topic of examination on the ground
27 that it is vague, ambiguous, and unintelligible. Plaintiffs have defined this topic to
28 link Warner/Chappell's verification of its Responses to Plaintiffs First Set of

1 Interrogatories to Warner/Chappell's responses to Plaintiffs' requests for
2 production, which responses are not (and are not required to be) verified.
3 Warner/Chappell does not know what Plaintiffs mean by their apparent attempt to
4 link the topic of Warner/Chappell's production of documents to a quotation from
5 Warner/Chappell's verification of its Responses to Plaintiffs First Set of
6 Interrogatories. Warner/Chappell also objects to this topic of examination on the
7 ground that it is overbroad, unduly burdensome, and/or intended to harass.
8 Warner/Chappell also objects to this topic of examination to the extent that it does
9 not describe with reasonable particularity the matters on which examination is
10 requested as required by Rule 30(b)(6) of the Federal Rules of Civil Procedure.
11 Warner/Chappell has produced thousands of pages in response to Plaintiffs' First
12 Set of Requests for Production of Documents. Warner/Chappell will not designate a
13 witness to testify on this patently overbroad and unintelligible topic.

14 **TOPIC NO. 10:**


15 Facts set forth in and which formed the basis of any denial or qualified
16 admission, Defendants' Responses to Plaintiffs' First and Second Set of Requests
17 for Admission assembled by "authorized employees or agents of Warner/Chappell
18 who informed [Nathan A. Osher] that the facts as to which [Nathan A. Osher] [did]
19 not have personal knowledge are true."

20 **RESPONSE TO TOPIC NO. 10:**

21 Warner/Chappell incorporates its General Objections.
22 Warner/Chappell specifically objects to this topic of examination to the extent that it
23 seeks Warner/Chappell's contentions and/or legal theories. Warner/Chappell
24 objects to this topic to the extent it purports to require Warner/Chappell to produce a
25 witness to testify about any information protected by the attorney-client privilege,
26 the attorney work-product doctrine, or any other privilege or protection from
27 disclosure. Warner/Chappell also objects to this topic of examination on the ground
28 that it is vague, ambiguous, and unintelligible. Plaintiffs have defined this topic to

1 link Warner/Chappell's verification of its Responses to Plaintiffs First Set of
2 Interrogatories to Warner/Chappell's responses to Plaintiffs' first and second set of
3 requests for admission, which responses are not (and are not required to be) verified.
4 Warner/Chappell also objects to this topic of examination to the extent that it does
5 not describe with reasonable particularity the matters on which examination is
6 requested as required by Rule 30(b)(6) of the Federal Rules of Civil Procedure.
7 Warner/Chappell will not designate a witness to testify on this patently overbroad
8 and unintelligible topic.

9
10 DATED: May 21, 2014

MUNGER, TOLLES & OLSON LLP
By: 
KELLY M. KLAUS

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

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PROOF OF SERVICE

*Good Morning to You Productions Corp., et al. v.
Warner/Chappel Music, Inc., et al.*
U.S. District Court Case No. CV 13-04460-GHK (MRWx)

STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the City and County of San Francisco, State of California. My business address is 560 Mission Street, Twenty-Seventh Floor, San Francisco, CA 94105-2907.

On May 27, 2014, I served true copies of the following document(s) described as

DEFENDANTS' OBJECTIONS TO PLAINTIFFS' AMENDED NOTICE OF TAKING DEPOSITION OF THE PERSON MOST KNOWLEDGEABLE OF DEFENDANT WARNER/CHAPPEL MUSIC, INC.

on the interested parties in this action as follows:

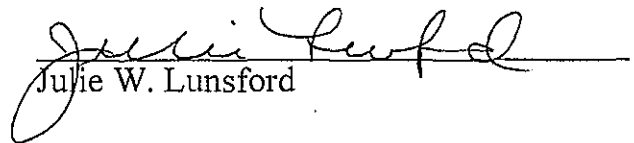
**** SEE ATTACHED SERVICE LIST ****

BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with the firm's practice for collecting and processing correspondence for mailing. On the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid, as indicated on the attached service list.

BY ELECTRONIC MAIL: As indicated on attached Service List. I caused such document(s) to be sent by electronic mail for instantaneous transmittal via telephone line.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on May 27, 2014, at San Francisco, California.


Julie W. Lunsford

SERVICE LIST

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