

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

Interim Lead Counsel for Plaintiffs and the [Proposed] Class

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA -
WESTERN DIVISION**

GOOD MORNING TO YOU) Lead Case No. CV 13-04460-GHK (MRWx)
PRODUCTIONS CORP., *et al.*,)
) **JOINT STATUS REPORT**
Plaintiffs,) **REGARDING THE PARTIES'**
) **POSITIONS AS TO SETTLEMENT**
v.) **DISCUSSIONS**
)
WARNER/CHAPPELL MUSIC,)
INC., *et al.*) Room: 650
) Judge: Hon. George H. King, Chief
Defendants.) Judge
)
)

1 As Ordered by the Court, the Parties jointly report their “positions as to
2 whether discussion of settlement at this point will be fruitful, and if so, whether the
3 Parties desire to proceed with settlement conferences before a magistrate judge or a
4 private mediator.” (Oct. 19, 2015 Order, Dkt. 248, ¶ 1.)

5 Lead counsel for Plaintiffs and Defendants will meet in person on Wednesday,
6 October 28, 2015, to discuss the Parties’ respective views concerning the possibility
7 of a consensual resolution to this case. If as a result of those discussions the Parties
8 believe that the participation of a third-party neutral would be helpful, the Parties will
9 work together to retain a private mediator for this purpose.

10
11
12 Dated: October 26, 2015

Respectfully submitted,

**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP**

13
14 By: /s/ Betsy C. Manifold
15 Betsy C. MANIFOLD

16 FRANCIS M. GREGOREK
17 gregorek@whafh.com
18 BETSY C. MANIFOLD
19 manifold@whafh.com
20 RACHELE R. RICKERT
21 rickert@whafh.com
22 MARISA C. LIVESAY
23 livesay@whafh.com
24 750 B Street, Suite 2770
25 San Diego, CA 92101
26 Telephone: 619/239-4599
27 Facsimile: 619/234-4599

**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP**

28 MARK C. RIFKIN (*pro hac vice*)
rifkin@whafh.com
JANINE POLLACK (*pro hac vice*)

1 pollack@whafh.com
2 BETH A. LANDES (*pro hac vice*)
3 landes@whafh.com
4 GITI BAGHBAN (284037)
5 baghban@whafh.com
6 270 Madison Avenue
7 New York, NY 10016
8 Telephone: 212/545-4600
9 Facsimile: 212-545-4753

10 *Interim Lead Counsel for Plaintiffs*
11 **RANDALL S. NEWMAN PC**
12 RANDALL S. NEWMAN (190547)
13 rsn@randallnewman.net
14 37 Wall Street, Penthouse D
15 New York, NY 10005
16 Telephone: 212/797-3737

17 **HUNT ORTMANN PALFFY NIEVES**
18 **DARLING & MAH, INC.**
19 ALISON C. GIBBS (257526)
20 gibbs@huntortmann.com
21 OMEL A. NIEVES (134444)
22 nieves@nieves-law.com
23 KATHLYNN E. SMITH (234541)
24 smith@huntortmann.com
25 301 North Lake Avenue, 7th Floor
26 Pasadena, CA 91101
27 Telephone 626/440-5200
28 Facsimile 626/796-0107

DONAHUE GALLAGHER WOODS LLP
WILLIAM R. HILL (114954)
rock@donahue.com
ANDREW S. MACKAY (197074)
andrew@donahue.com
DANIEL J. SCHACHT (259717)
daniel@donahue.com
1999 Harrison Street, 25th Floor

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Oakland, CA 94612-3520
Telephone: 510/451-0544
Facsimile: 510/832-1486

**GLANCY BINKOW &
GOLDBERG LLP**
LIONEL Z. GLANCY (134180)
lglancy@glancylaw.com
MARC L. GODINO (188669)
mgodino@glancylaw.com
1925 Century Park East, Suite 2100
Los Angeles, CA 90067
Telephone: 310/201-9150
Facsimile: 310/201-9160
Attorneys for Plaintiffs

MUNGER TOLLES & OLSON LLP

Dated: October 26, 2015

By: /s/ Kelly M. Klaus
Kelly M. Klaus
Adam I. Kaplan
560 Mission St., 27th Floor
San Francisco, CA 94105
Telephone: 415/512-4000
kelly.klaus@mto.com
adam.kaplan@mto.com

Glenn D. 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 Defendants Warner/Chappell
Music, Inc. and Summy-Birchard, Inc.*