

EXHIBIT B

Manifold, Betsy

From: Rifkin, Mark
Sent: Thursday, October 22, 2015 11:53 AM
To: 'Aguirre, Danielle'
Cc: Manifold, Betsy; rsn@randallnewman.net; Rosenthal, Jay; Schwartz, Eric
Subject: RE: Good Morning to You v Warner/Chappell - Request for Meet and Confer

Danielle, thanks again for taking the time to speak with Randy Newman and me this afternoon, and for clarifying that you do not intend to offer any new evidence in your amicus submission. Your argument will be that the Court misconstrued the evidence in the summary judgment record in finding no dispute of facts regarding the purported "mistaken" omission of Mildred's or Patty's name from the registration. On that basis, we told you that we would oppose your request to submit an amicus brief and will oppose your brief if it is accepted. We also suggested that you review Local Rule 7-18 in connection with your submission.

We look forward to seeing your brief, and we reserve all rights thereto.

Mark C. Rifkin | Wolf Haldenstein Adler Freeman & Herz LLP | 270 Madison Avenue, New York, NY 10016
firm: 212 545 4600 | direct: 212 545 4762 | fax: 212 545 4653 | rifkin@whafh.com

-----Original Message-----

From: Aguirre, Danielle [mailto:daguirre@nmpa.org]
Sent: Thursday, October 22, 2015 1:38 PM
To: Rifkin, Mark
Cc: Manifold, Betsy; rsn@randallnewman.net; Rosenthal, Jay; Schwartz, Eric
Subject: Re: Good Morning to You v Warner/Chappell - Request for Meet and Confer

Yes, I'll call you on your direct line.

Danielle M. Aguirre
General Counsel & SVP, Business Affairs
National Music Publishers' Association

> On Oct 22, 2015, at 12:36 PM, Rifkin, Mark <rifkin@whafh.com> wrote:
>
> Sure. Will you call me?
>
> Sent from my Mobile Device
> Mark C. Rifkin
>
> On Oct 22, 2015, at 12:29 PM, Aguirre, Danielle <daguirre@nmpa.org<<mailto:daguirre@nmpa.org>>> wrote:
>
> Mark,
>
> How about 2:30pmET/11:30am PT today?
>
> From: Rifkin, Mark [mailto:rifkin@whafh.com]

> Sent: Thursday, October 22, 2015 11:33 AM
> To: Aguirre, Danielle; Manifold, Betsy;
> rsn@randallnewman.net<mailto:rsn@randallnewman.net>
> Cc: Rosenthal, Jay; Schwartz, Eric
> Subject: RE: Good Morning to You v Warner/Chappell - Request for Meet
> and Confer
>
> I am available to meet and confer with you any time today before 5:00. I am traveling tomorrow, so today would be best. Thank you.

>
>
> _____
> _____ Mark C. Rifkin | Wolf Haldenstein Adler Freeman &
> Herz LLP | 270 Madison Avenue, New York, NY 10016
> firm: 212 545 4600 | direct: 212 545 4762 | fax: 212 545 4653 |
> rifkin@whafh.com<mailto:rifkin@whafh.com>

>
>
> From: Aguirre, Danielle [mailto:daguirre@nmpa.org]
> Sent: Thursday, October 22, 2015 11:12 AM
> To: Rifkin, Mark; Manifold, Betsy;
> rsn@randallnewman.net<mailto:rsn@randallnewman.net>
> Cc: Rosenthal, Jay; Schwartz, Eric
> Subject: Good Morning to You v Warner/Chappell - Request for Meet and
> Confer

>
> Marc, Betsy and Randall,
>
> I am reaching out as the General Counsel of the National Music Publishers' Association ("NMPA") concerning the case Good Morning to You Prod. Corp. v. Warner/Chappell, C.D.Cal., CV 13-04460 (GHK).

>
> As you know, the Central District of California has a rule on the filing of motions that requires counsel for the moving party to have a "meet and confer" with counsel prior to filing. NMPA intends to move the court for leave to file an amicus brief on Warner/Chappell's Motion for Reconsideration, or Alternatively to Certify Order for Interlocutory Appeal, filed on October 15, 2015.

>
> Although it is unclear whether C.D.Cal's rule applies to the filing of a motion for leave to file an amicus brief, I think it is best to assume it does. Please let me know if you have time to meet and confer by phone tomorrow (Friday). I am available between either 1-2pmET (10-11amPT) or 3:30-5pmET (12:30-2pm PT).

>
> Danielle M. Aguirre
> General Counsel & SVP, Business Affairs National Music Publishers'
> Association
> 975 F Street, NW
> Suite 375
> Washington, DC 20004
> Phone: (202) 393-6679
> Email: daguirre@nmpa.org<mailto:daguirre@nmpa.org>