

Exhibit 2

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10 *Interim Lead Counsel for Plaintiffs and the [Proposed] Class*

11 **UNITED STATES DISTRICT COURT**
 12 **CENTRAL DISTRICT OF CALIFORNIA -**
 13 **WESTERN DIVISION**

14	GOOD MORNING TO YOU)	Lead Case No. CV 13-04460-GHK (MRWx)
15	PRODUCTIONS CORP., <i>et al.</i> ,)	
16	Plaintiffs,)	PLAINTIFFS' SECOND REQUEST
17)	FOR PRODUCTION OF DOCUMENTS
18	v.)	TO DEFENDANTS
19	WARNER/CHAPPELL MUSIC,)	
20	INC., <i>et al.</i>)	
21	Defendant.)	
22)	

23 **PROPOUNDING PARTY:** **PLAINTIFFS GOOD MORNING TO YOU**
 24 **PRODUCTIONS CORP., ROBERT SIEGEL,**
 25 **RUPA MARYA AND MAJAR PRODUCTIONS,**
LLC

26 **RESPONDING PARTY:** **DEFENDANTS WARNER/CHAPPELL**
 27 **MUSIC, INC. AND SUMMY-BIRCHARD, INC.**

28 **SET NO.:** **TWO**

1 Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiffs,
2 Good Morning To You Productions Corp., Robert Siegel, Rupa Marya, and Majar
3 Productions, LLC (together, “Plaintiffs”), by and through their undersigned counsel
4 hereby propound the following second set of requests for production upon
5 Defendants Warner/Chappell Music, Inc. and Summy-Birchard, Inc. (collectively,
6 “Defendants”). Defendants shall identify and produce the requested documents and
7 things for inspection and copying within thirty (30) days—or such other time as the
8 parties may agree or the Court may order—during normal business hours, at the
9 offices of Wolf Haldenstein Adler Freeman & Herz LLP, 750 B Street, Suite 2770,
10 San Diego, California 92101.

11 DEFINITIONS

12 1. “Defendants” shall mean Warner/Chappell Music, Inc., and Summy-
13 Birchard, Inc. (or each individually, as context requires).

14 2. “Proposed Class” shall mean the class as defined in Plaintiffs’ Fifth
15 Amended Complaint.

16 3. “*Happy Birthday to You*” means the song *Happy Birthday to You*.

17 4. “Including” and “includes” shall be construed to mean “including
18 without limitation.”

19 5. The use of the singular form of any word includes the plural and
20 vice versa.

21 REQUESTS FOR PRODUCTION

22 REQUEST FOR PRODUCTION NO. 13:

23 All documents sufficient to determine the number of persons or entities (other
24 than Defendants and their directors, officers, employees, and affiliates) who entered
25 into a license or any other agreement with Defendants, their predecessors-in-interest,
26 or any of them, or paid Defendants, their predecessors-in-interest, or any of them,
27 directly or indirectly, anything of value for any rights regarding *Happy Birthday to*
28 *You* at any time since at least September 3, 1949.

1 **REQUEST FOR PRODUCTION NO. 14:**

2 All documents that identify or state the last known address for each and every
3 member of the Proposed Class or their successors-in-interest.

4 **REQUEST FOR PRODUCTION NO. 15:**

5 All licenses, assignments, consents, agreements, or undertakings of any kind
6 pursuant to which Defendants, their predecessors-in-interest, or any of them
7 purported to sell, confer, transfer, or grant to any member of the Proposed Class any
8 rights of any kind to *Happy Birthday to You* at any time since September 3, 1949.

9 **REQUEST FOR PRODUCTION NO. 16:**

10 All accounts, ledgers, journals, worksheets, spreadsheets, trial balances,
11 analyses, reviews, audits, accounting work papers, or due diligence records, reports,
12 or work papers that set forth, in whole or in part, the licensing fees, royalties,
13 payments, or other revenue received by Defendants or their predecessors-in-interest
14 for *Happy Birthday to You* each year since 1949.

15 **REQUEST FOR PRODUCTION NO. 17:**

16 All other documents that set forth, in whole or in part, the licensing fees,
17 royalties, payments, or other revenue received by Defendants or their predecessors-
18 in-interest for *Happy Birthday to You* each year since 1949.

19 **REQUEST FOR PRODUCTION NO. 18:**

20 All documents constituting, evidencing, or referring or relating to any dispute
21 or disagreement between Defendants, their predecessors-in-interest, or any of them
22 on the one hand and any other person or entity on the other hand regarding the scope
23 or validity of any purported federal or common law copyright relating to *Happy*
24 *Birthday to You*.

25 **REQUEST FOR PRODUCTION NO. 19:**

26 All documents constituting, evidencing, or referring or relating to the
27 ownership by anyone of any purported federal or common law copyright relating to
28 *Happy Birthday to You*.

1 **REQUEST FOR PRODUCTION NO. 20:**

2 All documents constituting, evidencing, or referring or relating to any advice
3 given to or received by Defendants, their predecessors-in-interest, or any of them
4 regarding the scope or validity of any purported federal or common law copyright
5 relating to *Happy Birthday to You*.

6 **REQUEST FOR PRODUCTION NO. 21:**

7 All documents setting forth any claim, contention, assertion, or other statement
8 of ownership by Defendants, their predecessors-in-interest, or any of them, of any
9 purported federal or common law copyright relating to *Happy Birthday to You*.

10 **REQUEST FOR PRODUCTION NO. 22:**

11 All documents setting forth any claim, contention, assertion, or other statement
12 of ownership by any person or entity other than Defendants and their predecessors-
13 in-interest, of any purported federal or common law copyright relating to *Happy*
14 *Birthday to You*, or any response by Defendants, their predecessors-in-interest, or any
15 of them, in response to any such claim, contention, assertion, or other statement of
16 ownership.

17 **REQUEST FOR PRODUCTION NO. 23:**

18 All documents that identify any agent that collected mechanical royalties on
19 behalf of Defendants, their predecessors-in-interest, or any of them for the use of
20 *Happy Birthday to You* since September 3, 1949.

21 **REQUEST FOR PRODUCTION NO. 24:**

22 All documents that identify any agent that collected synchronization license
23 fees on behalf of Defendants, their predecessors-in-interest, or any of them for the
24 use of *Happy Birthday to You* since September 3, 1949.

25 **REQUEST FOR PRODUCTION NO. 25:**

26 All documents that identify any agent that collected public performance
27 royalties on behalf of Defendants, their predecessors-in-interest, or any of them for
28 the use of *Happy Birthday to You* since September 3, 1949.

1 **REQUEST FOR PRODUCTION NO. 26:**

2 All documents constituting, evidencing, or referring or relating to any royalties
3 that Defendants, their predecessors-in-interest, or any of them paid to the Hill
4 Foundation, Inc., since September 3, 1949.

5 **REQUEST FOR PRODUCTION NO. 27:**

6 All Synchronization Request Forms for the use of *Happy Birthday to You*
7 received by either Defendant at any time since January 1, 1989.

8 **REQUEST FOR PRODUCTION NO. 28:**

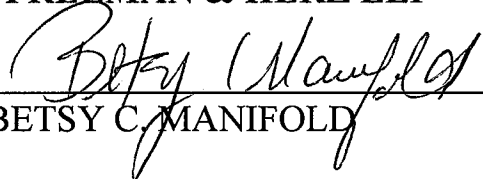
9 All documents constituting, evidencing, or referring or relating to how
10 Defendants determined the fee to charge or collect for any synchronization license,
11 public performance license, or any other use, publication, or performance of *Happy*
12 *Birthday to You* at any time since January 1, 1989.

13 **REQUEST FOR PRODUCTION NO. 29:**

14 All invoices that either Defendant sent to any third-party for the use,
15 publication, or performance of *Happy Birthday to You* at any time since January 1,
16 1989.

17 Dated: October 21, 2015

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