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

|                             |   |                                   |
|-----------------------------|---|-----------------------------------|
| RUPA MARYA, <i>et al.</i> , | ) | Lead Case No. CV 13-04460-GHK     |
|                             | ) | (MRWx)                            |
| Plaintiffs,                 | ) |                                   |
| v.                          | ) | <b>DECLARATION OF BETSY C.</b>    |
|                             | ) | <b>MANIFOLD IN SUPPORT OF</b>     |
|                             | ) | <b>MOTION FOR APPOINTMENT OF</b>  |
| WARNER/CHAPPELL MUSIC,      | ) | <b>WOLF HALDENSTEIN ADLER</b>     |
| INC.,                       | ) | <b>FREEMAN &amp; HERZ LLP AS</b>  |
| Defendant.                  | ) | <b>INTERIM LEAD CLASS COUNSEL</b> |
|                             | ) |                                   |
|                             | ) | Date: September 9, 2013           |
|                             | ) | Time: 9:30 a.m.                   |
|                             | ) | Room: 650                         |
|                             | ) | Judge: Hon. George H. King,       |
|                             | ) | Chief Judge                       |

1 I, Betsy C. Manifold, hereby declare as follows:

2 1. I am an attorney duly licensed to practice before all the courts of the  
3 State of California and before this court. I am a partner with the law firm Wolf  
4 Haldenstein Adler Freeman & Herz LLP (“Wolf Haldenstein”), counsel of record  
5 for plaintiffs. I have personal knowledge of the following facts, and if called upon  
6 to do so, I could and would competently testify thereto.

7 2. Working with its co-counsel, Randall S. Newman, Wolf Haldenstein  
8 has dedicated considerable time and resources and performed exhaustive research to  
9 independently investigate the claims asserted in this litigation. I have been  
10 personally involved in the work that Wolf Haldenstein has performed to date, and I  
11 have worked with several partners and associates of the firm in doing so.

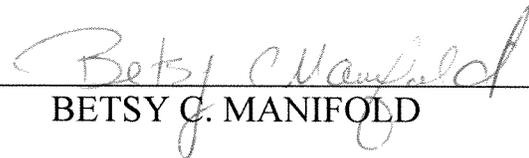
12 3. Wolf Haldenstein filed a highly-detailed complaint against  
13 Warner/Chappell after all the pertinent facts were uncovered. Among other things,  
14 Wolf Haldenstein met several times with a leading copyright scholar; parsed  
15 through scores of original copyright and assignment records; reviewed pleadings  
16 from decades-old, previously-filed actions; performed an exacting review of the  
17 Copyright Act of 1909 and its legislative history; visited the Library of Congress,  
18 the United States Copyright Office, as well as various university libraries to collect  
19 research; and reviewed hundreds of books and articles on the subject available in  
20 print and online. The original complaint that Wolf Haldenstein filed was  
21 meticulously researched and persuasively written.

22 4. Wolf Haldenstein has sought to coordinate the efforts of all plaintiffs’  
23 counsel in the prosecution of this litigation by moving to consolidate and coordinate  
24 these actions to reduce duplication of efforts and streamline the prosecution of the  
25 actions on behalf of Plaintiffs. Wolf Haldenstein has sought to include other  
26 counsel in the organization of the litigation, and thus far has obtained the support of  
27 Donohue Gallagher Woods, which had independently researched the validity of  
28

1 Warner/Chappell's copyright to *Happy Birthday to You*, to lead the prosecution for  
2 Plaintiffs.

3 5. Attached hereto as Exhibit A, is a true and correct copy of Wolf  
4 Haldenstein's firm resume.

5 I declare under penalty of perjury under the laws of the United States of  
6 America that the foregoing is true and correct. Executed this 5th day of August  
7 2013, at San Diego, California.

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10 BETSY C. MANIFOLD