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11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**  
13 **WESTERN DIVISION**  
14

15 GOOD MORNING TO YOU ) Lead Case No. CV 13-04460-GHK (MRWx)  
16 PRODUCTIONS CORP., *et al.*, )  
17 Plaintiffs, ) **DECLARATION OF JAMES**  
18 ) **CHRESSANTHIS IN SUPPORT OF**  
19 v. ) **PLAINTIFFS' REPLY TO MOTION**  
20 ) **FOR LEAVE TO AMEND AND FILE**  
21 ) **FIFTH AMENDED COMPLAINT**  
22 WARNER/CHAPPELL MUSIC, )  
23 INC., *et al.*, )  
24 Defendants. )  
25 )  
26 )  
27 )  
28 )  
Date: November 16, 2015  
Time: 9:30 a.m.  
Judge: Hon. George H. King,  
Chief Judge  
Room: 650

1 I, James Chressanthis, hereby declare as follows:

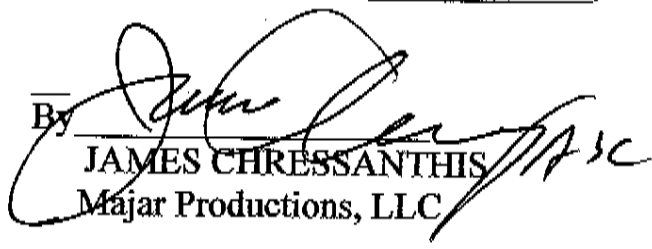
2 1. I am the managing member of Majar Productions, LLC ("Majar"). I am  
3 a resident of California and, through Majar, a Plaintiff in the above-entitled action.

4 2. On or about October 29, 2009, Majar paid defendant Warner/Chappell  
5 \$5,000 for a Synchronization License to use *Happy Birthday to You*.

6 3. I did not learn that there was a dispute with respect to whether or not  
7 defendant Warner/Chappell owned a copyright of *Happy Birthday to You* until this  
8 lawsuit was filed in June 2013. Prior to June 2013, I never heard about nor did I read  
9 the article written by Professor Brauneis that argued Warner/Chappell did not own a  
10 copyright to *Happy Birthday to You*.

11 4. Prior to the filing of this lawsuit, I had no reason to believe nor did I  
12 suspect that Warner/Chappell did not own a copyright to *Happy Birthday to You*. To  
13 the contrary, it was commonly known in the entertainment industry that  
14 Warner/Chappell claimed an exclusive copyright to *Happy Birthday to You* and it  
15 had been collecting royalties for use of the song for decades.

16 I declare under penalty of perjury that the foregoing is true and correct.  
17 Executed this 11th day of November 2015, in the City of NEW YORK, State of  
18 NEW YORK

19  
20 By   
21 JAMES CHRESSANTHIS  
22 Majar Productions, LLC