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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,)	DECLARATION OF BETSY C.
17)	MANIFOLD IN SUPPORT OF
18	v.)	PLAINTIFFS' EX PARTE
19	WARNER/CHAPPELL MUSIC,)	APPLICATION FOR LEAVE TO FILE
20	INC., <i>et al.</i>)	PLAINTIFF ROBERT SIEGEL'S
21	Defendants.)	DECLARATION IN FURTHER
22)	SUPPORT OF REPLY TO MOTION
23)	FOR LEAVE TO AMEND AND FILE
24)	FIFTH AMENDED COMPLAINT
25)	
26)	

22 Judge: Hon. George H. King,
 Chief Judge
 23 Room: 650

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

2 1. I am an attorney duly licensed to practice law in the States of California,
3 New York, and Wisconsin, and before this Court. I am a partner with the law firm
4 Wolf Haldenstein Adler Freeman & Herz LLP, interim lead class counsel for
5 plaintiffs and the class. I have personal knowledge of the following facts, and if
6 called upon to do so, I could and would competently testify as to them.

7 2. Plaintiffs filed a Motion for Leave to Amend and File a Fifth Amended
8 Complaint (“Motion”) on October 29, 2015 (Dkt. 258). On November 2, 2015, this
9 Court entered an order granting the parties joint stipulation expediting the briefing
10 schedule on Plaintiffs’ Motion. According to the expedited filing schedule,
11 Defendants opposed the Motion on November 9, 2015 (Dkt. 264), and Plaintiffs filed
12 their Reply in support of the Motion on November 12, 2015 (Dkt. 270).

13 3. My office did not receive a copy of Robert Siegel’s declaration in
14 support of the reply to Plaintiffs’ Motion for Leave to Amend and File Fifth
15 Amended Complaint until after November 12, 2015 because he was unavailable.
16 Attached hereto as Exhibit A is a true and correct copy of Mr. Siegel’s declaration.

17 4. On November 18, 2015, at 1:08 p.m., I requested Defendants’ counsel to
18 stipulate to the late filing of Mr. Siegel’s declaration. At 10:26 p.m. on that same
19 day, Mr. Klaus advised me that he would not stipulate to the late filing and that he
20 took no position as to whether the Court should allow the late filing. On November
21 19, 2015 at 7:39 a.m., I advised Defendants’ counsel that my office would file an ex
22 parte application.

23 I declare under penalty of perjury that the foregoing is true and correct.
24 Executed this 19th day of November 2015, in the City of San Diego, State of
25 California.

26 By: /s/ Betsy C. Manifold
27 BETSY C. MANIFOLD