

# EXHIBIT A

FRANCIS M. GREGOREK (144785)  
gregorek@whafh.com

BETSY C. MANIFOLD (182450)  
manifold@whafh.com

RACHELE R. RICKERT (190634)  
rickert@whafh.com

MARISA C. LIVESAY (223247)  
livesay@whafh.com

BRITTANY N. DEJONG (258766)  
dejong@whafh.com

**WOLF HALDENSTEIN ADLER FREEMAN & HERZ LLP**  
750 B Street, Suite 2770  
San Diego, CA 92101  
Telephone: 619/239-4599  
Facsimile: 619/234-4599

*Interim Lead Class Counsel for Plaintiffs and Proposed Class*

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

GOOD MORNING TO YOU	)	Lead Case No. CV 13-04460-GHK (MRWx)
PRODUCTIONS CORP., <i>et al.</i> ,	)	
	)	<b>DECLARATION OF ROBERT SIEGEL</b>
Plaintiffs,	)	<b>IN SUPPORT OF PLAINTIFFS' REPLY</b>
	)	<b>TO MOTION FOR LEAVE TO AMEND</b>
v.	)	<b>AND FILE FIFTH AMENDED</b>
	)	<b>COMPLAINT</b>
WARNER/CHAPPELL MUSIC,	)	
INC., <i>et al.</i> ,	)	Date: November 16, 2015
	)	Time: 9:30 a.m.
Defendants.	)	Judge: Hon. George H. King,
	)	Chief Judge
	)	Room: 650
	)	

I, Robert Siegel, hereby declare as follows:

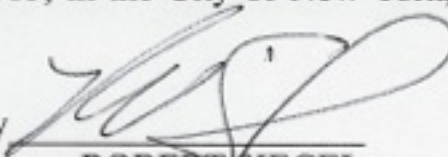
1. I am the assignee of Big Fan Productions, Inc., an inactive New York Corporation. I am a resident of New York, New York and a Plaintiff in the above-entitled action.

2. On or about September 1, 2009, Big Fan Productions, Inc. paid defendant Warner/Chappell \$3,000 for the Synchronization License to use *Happy Birthday to You*.

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

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

I declare under penalty of perjury that the foregoing is true and correct. Executed this 11th day of November 2015, in the City of New York, State of New York.

By   
ROBERT SIEGEL