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Interim Lead Counsel for Plaintiffs and the [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., *et al.*,)
) **STIPULATION EXTENDING STAY OF**
Plaintiffs,) **ALL PROCEEDINGS**
)
v.)
)
WARNER/CHAPPELL MUSIC,)
INC., *et al.*)
)
Defendants.) Room: 650
) Judge: Hon. George H. King, Chief
) Judge

1 WHEREAS, on December 18, 2015 the parties filed a status report and jointly
2 requested the Court stay all proceedings in this action through and including January
3 29, 2016, which is when the parties expected Plaintiffs to file a motion for
4 preliminary approval of a proposed class action settlement;

5 WHEREAS, on December 22, 2015, the Court granted the parties' request and
6 stayed all proceedings in this matter until February 1, 2016, and indicated that it
7 would consider extending the stay upon receipt of the preliminary approval papers
8 (ECF No. 295);

9 WHEREAS, the parties have been diligently negotiating the terms of a Class
10 Action Settlement Agreement and the exhibits thereto, and Plaintiffs have been
11 diligently preparing their motion for preliminary approval and supporting papers;

12 WHEREAS, the parties have been unable to finalize the Class Action
13 Settlement Agreement and the exhibits thereto and therefore Plaintiffs have been
14 unable to finalize and file their preliminary approval papers by January 29, 2016 as
15 previously expected;

16 WHEREAS, the parties agree that it is in their respective best interests to
17 continue the stay of all proceedings an additional week to allow sufficient time to
18 finalize the settlement papers;

19 **NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by
20 and between the parties, through the undersigned counsel, as follows:

21 Upon the Court's approval, the stay of all proceedings in this matter shall be
22 extended until February 8, 2016.

23 **IT IS SO STIPULATED.**

24
25 Dated: January 28, 2016

Respectfully submitted,

**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP**

26
27 By: /s/ Rachele R. Rickert
28 RACHELE R. RICKERT

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25 Dated: January 28, 2016

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14 *Attorneys for Defendants Warner/Chappell
15 Music, Inc. and Summy-Birchard, Inc.*

16 **DECLARATION REGARDING CONCURRENCE**

17 I, RACHELE R. RICKERT, am the ECF/CM User whose identification and
18 password are being used to file this STIPULATION EXTENDING STAY OF ALL
19 PROCEEDINGS. In compliance with L.R. 5-4.3.4(a)(2)(i), I hereby attest that Kelly
20 M. Klaus has concurred in this filing's content and has authorized its filing.

21 DATED: January 28, 2016

22 By: /s/ Rachele R. Rickert
23 RACHELE R. RICKERT