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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,)	JOINT STIPULATION RE: LATE
17	v.)	FILING OF PLAINTIFFS' MOTION
18)	FOR PRELIMINARY APPROVAL;
19	WARNER/CHAPPELL MUSIC,)	CONTINUANCE OF STAY; AND
20	INC., <i>et al.</i>)	REQUEST TO SHORTEN TIME FOR
21	Defendants.)	HEARING DATE AND [PROPOSED]
22)	ORDER GRANTING STIPULATION
23)	Date: March 14, 2016
24)	Time: 9:30 a.m.
25)	Room: 650
26)	Judge: Hon. George H. King,
27)	Chief Judge
28)	

1 WHEREAS, as directed by the Court (Dkt. No. 290), on December 18, 2015,
2 the Parties¹ filed a joint status report suggesting a proposed schedule and steps for
3 implementing a settlement in principal (the “Settlement”);

4 WHEREAS, on December 22, 2015, the Court stayed this action until
5 February 1, 2016 to allow the Parties to file a Motion for Preliminary Approval (Dkt.
6 No. 292);

7 WHEREAS, the Parties, by joint stipulation filed on January 29, 2016 (Dkt.
8 No. 298), requested that the filing date for the Motion for Preliminary Approval be
9 extended by one week to allow the Parties to resolve the remaining disputed issues;

10 WHEREAS, on January 29, 2016, the Court extended the filing date for the
11 Motion for Preliminary Approval to February 5, 2016 and extended the stay of this
12 action to February 8, 2016 (Dkt. No.299);

13 WHEREAS, after extensive negotiations over the last seven days, with
14 continuing (almost around the clock) exchange of multiple drafts of the settlement
15 agreement, notices, claim form, and other related settlement documents, Plaintiffs
16 and Defendants finally resolved the remaining Settlement issues;

17 WHEREAS, the Parties are now prepared to execute the Settlement
18 Agreement on February 8, 2016 and Plaintiffs are also prepared to file their Motion
19 for Preliminary Approval;

20 WHEREAS, until today, the Parties were unable to fully execute the
21 Settlement Agreement and Plaintiffs were unable to timely file their Motion for
22 Preliminary Approval;

23 _____
24 ¹ The “Parties” are defined as the “Plaintiffs,” which collectively refers to
25 Plaintiffs Good Morning To You Productions Corp., Robert Siegel, Rupa Marya, and
26 Majar Productions, LLC, the “Defendants” which collectively refers to Defendants
27 Warner/Chappell Music, Inc. and Summy-Birchard, Inc., and the “Intervenors”,
28 which collectively refers to the Association for Childhood Education International
and the Hill Foundation, Inc.

1 WHEREAS, the Parties have now executed the Settlement Agreement and the
2 Plaintiffs have concurrently lodged their Motion for Preliminary Approval as of this
3 date, which is one Court date late under the Court's January 29, 2016 Order;

4 WHEREAS, as good cause exists, the Parties request that the Court permit the
5 late filing of Plaintiffs' Motion for Preliminary Approval;

6 WHEREAS, Plaintiffs' Motion for Preliminary Approval, once filed, is
7 noticed to be heard on March 14, 2015 under L.R. 6-1;

8 WHEREAS, Plaintiffs' Motion for Preliminary Approval is unopposed and the
9 Court has expressed its desire to have this action resolved promptly and without
10 delay;

11 WHEREAS, the Parties request an order shortening time for the hearing of
12 Plaintiffs' Motion for Preliminary Approval to February 29, 2016; and

13 WHEREAS, the Parties further request a stay of this action pending the
14 Court's hearing and determination of the Plaintiffs' Motion for Preliminary
15 Approval;

16 **NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by
17 and between the Parties, through the undersigned counsel, as follows:

18 1. As good cause exists for the delay of one court day in filing, Plaintiffs
19 are permitted to file the attached Motion for Preliminary Approval of Class Action
20 Settlement;

21 2. Plaintiffs shall file the Motion for Preliminary Approval of Class Action
22 Settlement no later than one court day after entry of this Court's order; and

23 3. As the Court wishes to move this matter forward without delay and the
24 Plaintiffs' Motion for Preliminary Approval is unopposed, the date for hearing this
25 Motion shall be shortened to February 29, 2016; and

26 ///

27 ///

28 ///

1 4. Pending the hearing and Court's determination of Plaintiffs' Motion for
2 Preliminary Approval of Class Action Settlement, stay of this action shall be
3 continued except as necessary to implement the settlement.

4 **IT IS SO STIPULATED.**

5
6 Dated: February 8, 2016

Respectfully submitted,

**WOLF HALDENSTEIN ADLER
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Dated: February 8, 2016

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Dated: February 8, 2016

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14 *Attorneys for Intervenor*
15 THE ASSOCIATION FOR CHILDHOOD
16 EDUCATION INTERNATIONAL AND THE
17 HILL FOUNDATION, INC.

18 **DECLARATION REGARDING CONCURRENCE**

19 I, Betsy C. Manifold, am the CM/ECF User whose identification and password
20 are being used to file this: **JOINT STIPULATION RE: LATE FILING OF
21 PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL;
22 CONTINUANCE OF STAY AND REQUEST TO SHORTEN TIME FOR
23 HEARING DATE AND [PROPOSED] ORDER GRANTING STIPULATION.**

24 In compliance with L.R. 5-4.3.4(a)(2)(i), I hereby attest that Kelly M. Klaus and
25 Steven Tiller have concurred in this filing's content and has authorized its filing.

26 DATED: February 8, 2016

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