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

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. As discussed below, good cause exists for the delay of one Court day in
8 filing Plaintiffs' Motion for Preliminary Approval of Class Action Settlement. Also,
9 as the Court expressed a desire to move this case forward and the Motion is
10 unopposed, good cause also exists to shorten the hearing date. In light of the signed
11 Settlement Agreement and proposed Motion for Preliminary Approval, good cause
12 also exists to continue the stay pending the Preliminary Approval hearing and
13 Court's determination of same.

14 **PROCEDURAL BACKGROUND**

15 3. As directed by the Court (Dkt. No. 290), on December 18, 2015, the
16 Parties¹ filed a joint status report suggesting a proposed schedule and steps for
17 implementing a settlement in principal (the "Settlement").

18 4. On December 22, 2015, the Court stayed this action until February 1,
19 2016 to allow the Parties to file a Motion for Preliminary Approval (Dkt. No. 292).

20 5. The Parties, by joint stipulation filed on January 29, 2016 (Dkt. No.
21 298), requested that the filing date for the Motion for Preliminary Approval be
22 extended by one week to allow the Parties to resolve the remaining disputed issues.

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 **CONTINUANCE OF STAY**

2 16. In light of the executed Settlement Agreement and filing of Plaintiffs'
3 Motion for Preliminary Approval, a further stay of this action is warranted to allow
4 the Court to hear the Motion and determine if preliminary approval and notice to the
5 class is appropriate. Such a stay further conserves both judicial and the parties'
6 resources.

7 I declare under penalty of perjury that the foregoing is true and correct.
8 Executed this 8th day of February 2016, in the City of San Diego, State of California.

9 By: /s/ Betsy C. Manifold
10 BETSY C. MANIFOLD