1 2 3 4 5 6 7 8 9	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		ogodi Claug	
10	Interim Lead Counsel for Plaintiffs and the [Proposed] Class UNITED STATES DISTRICT COURT			
11 12	CENTRAL DISTRICT OF CALIFORNIA			
12	WESTERN DIVISION			
14	GOOD MORNING TO YOU PRODUCTIONS CORP., <i>et al.</i> ,	) Lead Case	No. CV 13-04460-GHK (MRWx)	
15			ATION OF BETSY C.	
16	Plaintiffs,		LD IN SUPPORT OF JOINT FION RE: LATE FILING OF	
17	v.	) <b>PLAINTI</b>	FFS' MOTION FOR	
18 19	WARNER/CHAPPELL MUSIC,		NARY APPROVAL; JANCE OF STAY AND	
20	INC., <i>et al</i> .	-	TO SHORTEN TIME FOR	
21	Defendants.		G DATE AND [PROPOSED] RANTING STIPULATION	
22		) Date:	March 14, 2016	
23		) Time: ) Room:	9:30 a.m. 650	
24		Judge:	Hon. George H. King,	
25 26		)	Chief Judge	
26 27	· · · · · · · · · · · · · · · · · · ·			
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I, Betsy C. Manifold, hereby declare as follows:

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

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

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## PROCEDURAL BACKGROUND

3. As directed by the Court (Dkt. No. 290), on December 18, 2015, the
Parties<sup>1</sup> filed a joint status report suggesting a proposed schedule and steps for
implementing a settlement in principal (the "Settlement").

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

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
extended by one week to allow the Parties to resolve the remaining disputed issues.

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<sup>The "Parties" are defined as the "Plaintiffs," which collectively refers to
Plaintiffs Good Morning To You Productions Corp., Robert Siegel, Rupa Marya, and
Majar Productions, LLC, the "Defendants" which collectively refers to Defendants
Warner/Chappell Music, Inc. and Summy-Birchard, Inc., and the "Intervenors",
which collectively refers to the Association for Childhood Education International
and the Hill Foundation, Inc.</sup> 

1 6. On January 29, 2016, the Court extended the filing date for the Motion for Preliminary Approval to February 5, 2016 and extended the stay of this action to 2 February 8, 2016 (Dkt. No. 299). 3 4 **GOOD CAUSE FOR ONE DAY DELAY** 5 7. After extensive negotiations over the last seven days, with continuing (almost around the clock) exchange of multiple drafts of the settlement agreement, 6 7 notices, claim form, and other related settlement documents, Plaintiffs and Defendants finally resolved the remaining Settlement issues. 8 9 8. The Parties were finally prepared to execute the Settlement Agreement 10 today. 11 9. Plaintiffs are also prepared to file their Motion for Preliminary Approval 12 today. 13 10. The Parties despite diligent efforts to do so were unable to sign the Settlement Agreement on February 5, 2016. 14 11. 15 The Parties have now executed the Settlement Agreement and the Plaintiffs have concurrently lodged their Motion for Preliminary Approval as of this 16 date, which is one Court date late under the Court's January 29, 2016 Order. 17 18 12. As the Parties were diligent and worked exhaustively to negotiate and reach an agreement, the Parties believe that good cause exists and request that the 19 20Court permit the late filing of Plaintiffs' Motion for Preliminary Approval. 21 <u>REQUEST TO SHORTEN TIME</u> 22 13. Plaintiffs' Motion for Preliminary Approval, once filed, is noticed to be 23 heard on March 14, 2015 under L.R. 6-1. 24 Plaintiffs' Motion for Preliminary Approval is unopposed and the Court 14. 25 has previously expressed its desire to have this action resolved promptly and without 26 further delay. 27 The Parties request an order shortening time for the hearing of 15. Plaintiffs' Motion for Preliminary Approval to February 9, 2016. 28

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			
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