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10 *Interim Lead Counsel for Plaintiffs and the [Proposed] Class*
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12 **UNITED STATES DISTRICT COURT**
 13 **CENTRAL DISTRICT OF CALIFORNIA -**
 14 **WESTERN DIVISION**

GOOD MORNING TO YOU)	Lead Case No. CV 13-04460-GHK (MRWx)
PRODUCTIONS CORP., <i>et al.</i> ,)	
)	STIPULATION EXTENDING
Plaintiffs,)	CLAIMS DEADLINE FOR CERTAIN
)	SETTLEMENT CLASS MEMBERS
v.)	
)	
WARNER/CHAPPELL MUSIC,)	
INC., <i>et al.</i>)	
)	Room: 650
Defendants.)	Judge: Hon. George H. King, Chief
)	Judge
)	

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1 Plaintiffs and Defendants, by and through their undersigned counsel, hereby
2 stipulate and agree as follows:

3 WHEREAS, pursuant to the Preliminary Approval Order, on March 28, 2016,
4 the Settlement Administrator mailed Notice to 1,566 Settlement Class Members
5 whose names and addresses were provided to the Settlement Administrator by
6 Defendants;

7 WHEREAS, on April 8, 2016, Plaintiffs' Counsel, without notice to
8 Defendants' counsel, provided to the Settlement Administrator a list of 83 names
9 and email addresses for foreign rights societies that Plaintiffs' Counsel believed may
10 be Settlement Class Members, and requested that the Settlement Administrator send
11 Notices by email to those 83 foreign rights societies;

12 WHEREAS, through a clerical mistake by the Settlement Administrator,
13 those emails were not sent until May 5, 2016, a lapse of 27 days;

14 WHEREAS, during the week of May 23, 2016, the Settlement Administrator
15 and Plaintiffs' Counsel first informed Defendants' Counsel of the aforementioned
16 list of foreign rights societies and of the aforementioned clerical mistake; and the
17 Settlement Administrator confirmed to the parties that Notices were timely mailed
18 to 35 of the 83 foreign rights societies on the aforementioned list provided when the
19 Notices were mailed on March 28, 2016, but the Settlement Administrator had no
20 way of verifying that the remaining 48 foreign rights societies on the list received
21 Notice until the email was sent on May 5, 2016; a list of the 48 foreign rights
22 societies in issue is attached to this Stipulation as Exhibit A;

23 WHEREAS, counsel for Plaintiffs and Defendants and the Settlement
24 Administrator have conferred and, to accommodate those 48 foreign rights societies
25 on the aforementioned list, have agreed to extend the deadline for those 48 foreign
26 rights societies to submit claims against the Net Settlement Fund by 27 days, until
27 June 24, 2016; and

28 ///

1 WHEREAS, counsel for Plaintiffs directed the Settlement Administrator to
2 send, and the Settlement Administrator on May 27, 2016, will send, the following
3 email to those 48 foreign rights societies, advising them of the extension of the
4 deadline for them to file claims:

5 **RE: Happy Birthday Litigation Extension of Claim Deadline**

6 **You may not have received notice of the Settlement until May 5,**
7 **2016, when it was sent to you by email. Therefore, please be**
8 **advised that the Parties have agreed to extend the deadline for you**
9 **to submit a claim to June 24, 2016. To be timely, your claim must**
10 **be received by the Settlement Administrator no later than June 24,**
11 **2016. No other dates or deadlines have been changed.**

12 THEREFORE, Plaintiffs and Defendants hereby stipulate and agree that the
13 deadline for those 48 foreign rights societies to submit Claims shall be extended by
14 27 days, until June 24, 2016. All other dates and deadlines shall remain unchanged.

15 Dated: May 27, 2016

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16 By: /s/ Rachele R. Rickert
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