

DECLARATION OF BESTY C. MANIFOLD

I, Betsy C. Manifold, hereby declare:

1. I am an attorney duly licensed to practice law in the states of California, Wisconsin, and New York; and am a partner at the law firm of Wolf Haldenstein Adler Freeman & Herz LLP, counsel of record for plaintiffs Good Morning To You Productions Corp., Robert Siegel, and Rupa Marya. I have personal knowledge of the facts stated herein and if called upon to testify as to them, I could, and would, competently do so.

2. The parties have met and conferred, and agreed that Plaintiffs shall, within two (2) days of the filing of this stipulation, hand-serve or electronically deliver to Defendants' counsel a Consolidated Second Amended Class Action Complaint, solely to conform the allegations and claims in the Consolidated First Amended Class Action Complaint and the complaint in the *Major* Action to each other, as provided by this stipulation; and Plaintiffs shall, within two (2) days of the entry of the Order on this stipulation, file the Consolidated Second Amended Class Action Complaint, unless otherwise ordered by the Court.

3. The parties have met and conferred and agreed that, because the Consolidated Second Amended Class Action Complaint will not make any substantive changes to the allegations or claims as previously filed in the Consolidated First Amended Class Action Complaint or the complaint in the *Major* Action, the schedule established by the Court's Consolidation Order for Defendant Warner/Chappell's response to the Consolidated Complaint should remain unchanged, such that Defendants Warner/Chappell and Summy's response to the Consolidated Second Amended Class Action Complaint should be as per that Consolidation Order.

///

///

///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I declare under penalty of perjury that the foregoing is true and correct.
Executed this 14th day of August, 2013, in San Diego, California.

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