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 9 **UNITED STATES DISTRICT COURT**
CENTRAL DISTRICT OF CALIFORNIA
 10 **WESTERN DIVISION**

11 GOOD MORNING TO YOU
 PRODUCTIONS CORP.; et al.,
 12
 13 Plaintiffs,
 14 v.
 15 WARNER/CHAPPELL MUSIC, INC.,
 et al.,
 16 Defendants.

Lead Case No. CV 13-04460-GHK (MRWx)

**DEFENDANTS' APPLICATION TO
 FILE UNDER SEAL THEIR
 UNREDACTED RESPONSE TO
 CLASS COUNSEL'S BILLING
 RECORDS AND EXHIBITS
 THERETO**

Courtroom: 650
 Judge: Hon. George H. King,

1 **TO THE COURT AND ALL PARTIES AND THEIR RESPECTIVE**
2 **COUNSEL OF RECORD:**

3 Pursuant to Central District of California Civil Local Rule 79-5.1; the Court’s
4 Order of June 10, 2016 (Dkt. No. 334), which required Class Counsel to file under
5 seal their billing records in this matter; and the Court’s Order of June 27, 2016
6 Order (Dkt. 347), which set forth the briefing schedule for Defendants’ response to
7 Class Counsel’s billing records, Defendants Warner/Chappell Music, Inc. and
8 Summy-Birchard, Inc. (jointly, “Defendants”) hereby apply for an Order permitting
9 the following to be filed under seal: Defendants’ Unredacted Response to Class
10 Counsel’s Billing Records (“Unredacted Response”) and Exhibits 1-5 thereto.¹

11 This application is based on the Sealed Klaus Declaration in Support of
12 Application to File Under Seal, the Court’s June 10, 2016 Order requiring Class
13 Counsel to file under seal their billing records, and any other information that the
14 Court deems appropriate.

15 Defendants’ Unredacted Response and Exhibits 1-5 thereto quote from Class
16 Counsel’s billing records, which Class Counsel filed under seal pursuant to the
17 Court’s June 10, 2016 Order. In order to maintain the confidentiality of Class
18 Counsel’s billing records, Defendants’ Unredacted Response and Exhibits 1-5
19 thereto need to be filed under seal as well. *Cf. Phillips ex rel. Estates of Byrd v.*
20 *Gen. Motors Corp.*, 307 F.3d 1206, 1213 (9th Cir. 2002) (“When a court grants a
21 protective order for information produced during discovery, it already has
22 determined that ‘good cause’ exists to protect this information from being disclosed
23 to the public by balancing the needs for discovery against the need for
24 confidentiality.”).

25 Defendants therefore submit the Unredacted Response and Exhibits 1-5 under
26 seal and respectfully request that the Court grant this Application.

27 ¹ Defendants will publicly file a redacted version of their Response to Class
28 Counsel’s billing records.

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DATED: July 5, 2016

MUNGER, TOLLES & OLSON LLP

By: /s/ Kelly M. Klaus
KELLY M. KLAUS
Attorneys for Defendants