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10 [Additional Counsel Appear on Signature Page]
11

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**
14 **WESTERN DIVISION**

15	GOOD MORNING TO YOU	)	Lead Case No. CV 13-04460-GHK
16	PRODUCTIONS CORP., <i>et al.</i> ,	)	(MRWx)
		)	
17	Plaintiffs,	)	NOTICE OF PLAINTIFFS'
18		)	SUBMISSION IN RESPONSE TO
19	v.	)	THE COURT'S REQUEST AT
		)	OCTOBER 7, 2013 HEARING ON
20	WARNER/CHAPPELL MUSIC,	)	DEFENDANTS' MOTION TO
21	INC., <i>et al.</i> ,	)	DISMISS
		)	
22	Defendants.	)	Date: October 7, 2013
23		)	Time: 9:30 a.m.
24		)	Room: 650 (Roybal)
25		)	Judge: Hon. George H. King, Chief Judge
26		)	
27			
28			

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

3 At the October 7, 2013-hearing on defendants' motion to dismiss (the
4 "October 7 Hearing"), the Court directed plaintiffs to make a supplemental
5 submission identifying the specific paragraphs in the Second Amended Class Action
6 Complaint ("SAC") [ECF No. 59] which set forth their two-step analysis related to
7 the scope and validity of defendants' claim of copyright to the song "Happy Birthday
8 to You." Pursuant to the Court's direction, plaintiffs identify the following SAC
9 paragraphs:

10 7, 58, 59, 60, 62-66, 75-114, and 163-165 (with emphasis on ¶¶ 77, 78,
11 81, 82, 85, 86, 89, 90, 92-95, 98-100, 108, and 109).

12 Although plaintiffs believe that the aforementioned paragraphs adequately
13 support the two-step analysis discussed at the October 7 Hearing, should the Court
14 require further clarification, plaintiffs respectfully request leave to file an amended
15 complaint within two court days following entry of an Order granting same.

16 Respectfully submitted.

17 Dated: October 8, 2013

WOLF HALDENSTEIN ADLER
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19 By: /s/Betsy C. Manifold
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