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 Warner/Chappell Music, Inc. and
 Summy-Birchard, Inc.
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10 **UNITED STATES DISTRICT COURT**
 11 **CENTRAL DISTRICT OF CALIFORNIA**
 12 **WESTERN DIVISION**

13 GOOD MORNING TO YOU
 PRODUCTIONS CORP.; ROBERT
 14 SIEGEL; RUPA MARYA; and
 MAJAR PRODUCTIONS, LLC; On
 15 Behalf of Themselves and All Others
 Similarly Situated,
 16
 Plaintiffs,
 17
 v.
 18 WARNER/CHAPPELL MUSIC, INC.,
 19 and SUMMY-BIRCHARD, INC.,
 20
 Defendants.
 21

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

**DECLARATION OF KELLY M.
 KLAUS IN SUPPORT OF
 STIPULATION REGARDING
 DEADLINE FOR DEFENDANTS'
 RESPONSE TO PLAINTIFFS'
 THIRD AMENDED
 CONSOLIDATED COMPLAINT**

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1 I, Kelly M. Klaus, hereby declare:

2 1. I am an attorney duly licensed to practice law in the state of California
3 and am a partner at the law firm of Munger, Tolles & Olson LLP, counsel for
4 Defendants Warner/Chappell Music, Inc. and Summy-Birchard, Inc. I have
5 personal knowledge of the facts stated herein and if called upon to testify as to them,
6 I could and would competently do so.

7 2. Defendants have informed Plaintiffs that (1) Defendants presently
8 intend to answer the Third Amended Consolidated Complaint, (2) Defendants
9 request a brief extension, by two-weeks, of their deadline for responding to the
10 Third Amended Consolidated Complaint, given the number of allegations in the
11 Third Amended Consolidated Complaint and the fact that the current deadline is the
12 day before Thanksgiving, and (3) if Defendants ultimately do file a motion, they
13 will meet-and-confer in advance of the motion as required by the Local Rules, and
14 will stipulate to a request to adjust the briefing schedule on any such motion to
15 accommodate the schedules of Plaintiffs' counsel during the December holiday
season.

16 3. The parties have met and conferred, and Plaintiffs have agreed to
17 stipulate to a two-week extension of Defendants' response deadline pursuant to the
18 terms of the preceding paragraph.

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20 I declare under penalty of perjury that the foregoing is true and correct.
21 Executed this 19th day of November, 2013, in San Francisco, California.

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25 /s/ Kelly M. Klaus
26 KELLY M. KLAUS