

3 JEFFREY G. KNOWLES (State Bar No. 129754)
JULIA D. GREER (State Bar No. 200479)
4 KATHLEEN F. McCONNELL (State Bar No. 239479)
COBLENTZ PATCH DUFFY & BASS LLP
5 One Ferry Building, Suite 200
San Francisco, California 94111-4213
6 Telephone: 415.391.4800
Facsimile: 415.989.1663
7 Email: ef-jgk@cpdb.com
ef-jdg@cpdb.com
8 ef-kfm@cpdb.com

9 Attorneys for Reply Counterdefendant
SONY MUSIC ENTERTAINMENT,
: erroneously sued as SONY MUSIC HOLDINGS,
INC.
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;

32 ~~WPKVGF UVCVGUFKVTKEV EQWTV~~
33 ~~PQTVJ GTP FKVTKEV QHECNHQTPK. UCP HTCPEKEQ FKVKUQP~~

35 STEVEN AMES BROWN,
36 Plaintiff,
37 v.
38 ANDREW B. STROUD, an individual,
39 Defendant.

Case Nos. CV 08-02348 JSW

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~~O CPF CVQT[UGVVNGO GPV~~
~~EQPHGTGPEG~~

Date action filed: May 7, 2008
Judge : Hon. Maria-Elena James
Place : Courtroom B, 15th Floor

3: AND DEFENDANT'S RELATED
3; COUNTERCLAIMS

42 STEVEN AMES BROWN,
43 Reply Counterclaimant,
44 v.
45 ANDREW B. STROUD, and SONY MUSIC
46 HOLDINGS, INC.,
47 Reply Counterdefendants.
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LISA SIMONE KELLY, duly appointed
administrator of the Estate of Nina Simone,

Plaintiff,

v.

WALLY ROKER, an individual, and d/b/a ICU
ENT. DIST.; d/b/a WALLY ROKER MUSIC;
ANDY STROUD, INC.; and ANDREW B.
STROUD.

Defendants.

Case No.: CV 11-5822 JSW

Sony Music Entertainment, the Estate of Nina Simone, and Steven Ames Brown
(collectively, "Stipulating Parties"), by and through their respective counsel, submit the following
Stipulation and Proposed Order:

WHEREAS, Stipulating Parties have sought default judgment in the above-referenced
actions against Defendants and Counterclaimants Estate of Andrew B Stroud, Stroud Productions
and Enterprises, Inc., and Andy Stroud, Inc. (collectively, "Stroud"), with such motions currently
pending before the Hon. Jeffrey S. White;

WHEREAS, on or about June 4, 2013, the Court referred the motions seeking default
judgment to a randomly assigned Magistrate Judge to prepare a report and recommendation
(Docket No. 566 in Case No. 08:2348);

WHEREAS, on or about September 4, 2013, the motions were heard by U.S. Magistrate
Judge Nathanael Cousins, but no Report and Recommendation has yet been issued;

WHEREAS, disposition of those motions will affect the manner in which the various
parties approach and effectuate settlement;

WHEREAS, on or about June 5, 2013, Stroud filed Notices of Appeal to the Ninth Circuit
in the above-captioned actions;

WHEREAS, while the Stipulating Parties believe Stroud's appeals are frivolous and
improper, and have briefed that issue to the Ninth Circuit, the Ninth Circuit has not yet addressed
whether it will maintain jurisdiction over the appeals;

1 WHEREAS, counsel for the Estate of Nina Simone and representatives for Sony Music
2 Entertainment must travel from New York for the settlement conference, and the uncertainty of
3 whether the settlement conference will go forward given the appeals makes scheduling and travel
4 plans burdensome and difficult;

5 WHEREAS, Stipulating Parties believe that allowing time for resolution of the propriety of
6 the Ninth Circuit Appeals, and of the pending motions seeking default judgment, will facilitate
7 settlement, improve efficiency, and lessen the burden on the Court and the parties;

8 THEREFORE, the Stipulating Parties respectfully request that the Mandatory Settlement
9 Conference currently set for September 25, 2013 be put over for approximately 60 days to a date
10 acceptable to the Court and the parties. The parties will timely meet and confer and convey
11 mutually acceptable date(s) to the Court's clerk.

12 **IT IS SO STIPULATED.**

13 Dated: September 13, 2013

14 Respectfully submitted,

15 /s/ Steven Ames Brown
16 STEVEN AMES BROWN,
17 Plaintiff in *Pro Se*

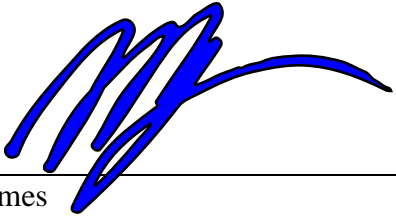
18 /s/ Dorothy M. Weber
19 DOROTHY M. WEBER, *pro hac vice*
20 Shukat, Arrow, Hafer, Weber &
21 Herbsman, LLP
22 Attorney for Estate of Nina Simone

23 The 9/25/13 conference is
24 VACATED. Parties to notify Court
25 of available dates.

26 /s/ Julia D. Greer
27 JULIA D. GREER
28 Coblentz, Patch, Duffy & Bass, LLP,
Attorney for Sony Music Entertainment,
erroneously sued as Sony Music
Holdings, Inc.

IT IS SO ORDERED.

DATED: September 16, 2013



Hon. Maria-Elena James

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Listing of counsel filing this paper:

STEVEN AMES BROWN
Entertainment Law 83363
69 Grand View Avenue
San Francisco, California 94114-2741
415/647-7700 Tele
415/285-3048 Fax
sabrown@entertainmentlaw.com

THERESE Y. CANNATA SBN 88032
Cannata, Ching & O’Toole, LLP
100 Pine Street, Suite 1775
San Francisco, California 94111-5127
415/409-8900 Tele
415/409-8904 Fax
tcannata@ccolaw.com

Attorneys for Plaintiff

DOROTHY M. WEBER, *pro hac vice*
Shukat, Arrow, Hafer, Weber &
Herbsman, LLP
111 West 57th Street, Suite 1120
New York, New York 10019
212/245-4580 Tele
212/956-6471 Fax
dorothy@musiclaw.com

Attorneys for Estate of Nina Simone

JULIA D. GREER SBN 200479
Coblentz, Patch, Duffy & Bass, LLP
One Ferry Building, Suite 200
San Francisco, California 94111-4213
ef-jdg@cpdb.com

Attorneys for Reply Counter-Defendant Sony Music Entertainment,
erroneously sued as Sony Music Holdings, Inc.