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5 *Chair of Lead Class Counsel Group for Plaintiffs*

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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO COURTHOUSE

RICK JAMES, by and through THE JAMES)
 AMBROSE JOHNSON, JR., 1999 TRUST, his)
 successor in interest; CARLTON DOUGLAS)
 RIDENHOUR d/b/a "CHUCK D," individually)
 and as a member of PUBLIC ENEMY;)
 WHITESNAKE, a doing business as designation)
 of David Coverdale, by and for WHITESNAKE)
 PRODUCTIONS (OVERSEAS) LIMITED;)
 DAVE MASON; OTIS WILLIAMS and RON)
 TYSON, jointly d/b/a THE TEMPTATIONS;)
 and ROBERT WALTER "BO" DONALDSON,)
 individually and d/b/a BO DONALDSON AND)
 THE HEYWOODS; WILLIAM MCLEAN a/k/a)
 "WILL MCLEAN" and p/k/a "MISTA)
 LAWNGE," and ANDRES TITUS p/k/a)
 "DRES," jointly d/b/a BLACKSHEEP,)
 individually and on behalf of all others similarly)
 situated,)
 Plaintiffs,)
 vs.)
 UMG RECORDINGS, INC., a Delaware)
 corporation,)
 Defendants.)

Case No. CV-11-1613 SI (MEJx)
**STIPULATION TO DEFER THE
 PARTIES' TIME TO OBJECT TO
 DISCOVERY ORDER DATED
 NOVEMBER 8, 2013**

1 This stipulation is based upon the following facts:

2 A. On November 8, 2013, Magistrate Judge James entered an order concerning certain
3 discovery issues raised by plaintiffs (the “November 8 Discovery Order”), granting in part and
4 denying in part plaintiffs’ requests.

5 B. Pursuant to Fed. R. Civ. P. 72(a), the parties’ deadline to file objections to the
6 November 8 Discovery Order is currently November 22, 2013.

7 C. For reasons related to the parties’ ongoing meet-and-confer process, and with the
8 hope that the matter will be resolved or narrowed through the meet-and-confer process, the parties
9 wish to defer their time to object to the November 8 Discovery Order.

10 THEREFORE, the parties hereby stipulate as follows, and request that the Court enter an
11 order providing that the deadline for any party to file objections to the November 8 Discovery Order
12 is extended to December 13, 2013, notwithstanding the provisions of Fed. R. Civ. P. 72(a).

13 IT IS SO STIPULATED.

14 DATED: November 20, 2013

LEONARD B. SIMON
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s/ LEONARD B. SIMON

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1 DATED: November 20, 2013

JEFFREY D. GOLDMAN
RYAN S. MAUCK
BRIAN M. YATES
JEFFER MANGELS BUTLER & MITCHELL LLP

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s/ JEFFREY D. GOLDMAN

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Attorneys for Defendant UMG Recordings, Inc.

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11 I, Leonard B. Simon, am the ECF user whose identification and password are being used to
12 file this document. In compliance with General Order 45, Section X.B., I hereby attest that
13 concurrence in the filing of the document has been obtained from each of the other signatories.

14 DATED: November 20, 2013

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s/ LEONARD B. SIMON

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LEONARD B. SIMON

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PROPOSED ORDER

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Pursuant to stipulation, IT IS SO ORDERED.

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DATED: 11/21/13

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THE HONORABLE SUSAN ILLSTON

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United States District Judge

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on November 20, 2013, I authorized the electronic filing of the foregoing
3 with the Clerk of the Court using the CM/ECF system which will send notification of such filing to
4 the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I
5 caused to be mailed the foregoing document or paper via the United States Postal Service to the non-
6 CM/ECF participants indicated on the attached Manual Notice List.

7 I certify under penalty of perjury under the laws of the United States of America that the
8 foregoing is true and correct. Executed on November 20, 2013.

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10 s/ LEONARD B. SIMON
LEONARD B. SIMON

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