

1 JEFFREY D. GOLDMAN (Bar No. 155589),
 JGoldman@jmbm.com
 2 RYAN S. MAUCK (Bar No. 223173), RMauck@jmbm.com
 BRIAN M. YATES (Bar No. 241798), BYates@jmbm.com
 3 JEFFER MANGELS BUTLER & MITCHELL LLP
 1900 Avenue of the Stars, Seventh Floor
 4 Los Angeles, California 90067-4308
 Telephone: (310) 203-8080
 5 Facsimile: (310) 203-0567

6 Attorneys for Defendant UMG RECORDINGS, INC.

7
 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

10
 11 RICK JAMES, by and through THE JAMES
 AMBROSE JOHNSON, JR. 1999 TRUST, his
 12 successor in interest, individually and on behalf
 of all others similarly situated,

13
 14 Plaintiff,

15 v.

16
 17 UMG RECORDINGS, INC., a Delaware
 corporation,

18
 19 Defendant.

CASE NO. CV11-01613 SI

CASE NO. CV11-02431 SI

CASE NO. CV11-05321-SI

CASE NO. CV12-01289-JCS

CASE NO. CV12-01305-SI

STIPULATION TO CONSOLIDATE CASES

(AS MODIFIED)

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 21
 22 ROB ZOMBIE, a/k/a Robert Wolfgang
 Zombie, f/k/a Robert Cummings; WHITE
 23 ZOMBIE, a general partnership;
 WHITESNAKE, a doing business as
 24 designation of David Coverdale, by and for
 WHITESNAKE PRODUCTIONS
 25 (OVERSEAS) LIMITED; and DAVE MASON,
 individually and on behalf of all others
 26 similarly situated,

27 Plaintiff

28 v.

JMBM
 Jeffer Mangels
 Butler & Mitchell LLP

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UMG RECORDINGS, INC., a Delaware corporation,
Defendant.

CARLTON DOUGLAS RIDENHOUR, d/b/a "CHUCK D", INDIVIDUALLY AND AS A MEMBER OF "PUBLIC ENEMY", ON BEHALF OF HIMSELF AND ALL OTHERS SIMILARLY SITUATED,
Plaintiff,
v.
UMG RECORDINGS, INC., a Delaware corporation,
Defendant.

OTIS WILLIAMS, RON TYSON, jointly d/b/a "THE TEMPTATIONS," on behalf of themselves and all others similarly situated,
Plaintiff,
v.
UMG RECORDINGS, INC., a Delaware corporation,
Defendant.

OTIS ROBERT HARRIS, JR., a.k.a. DAMON HARRIS, individually and on behalf of all others similarly situated,
Plaintiff,
v.
UMG RECORDINGS, INC., a Delaware corporation,
Defendant.

1 This stipulation is based on the following facts:

2 1. On March 27, 2012, this Court entered an order granting Plaintiff Otis Robert Harris,
3 Jr. a.k.a. Damon Harris’s administrative motion to relate *Harris v. UMG Recordings, Inc.*, Case No.
4 CV12-01305-SI (the “Harris Action”) with *Ridenhour v. UMG Recordings, Inc.*, Case No. CV11-
5 05321-SI (the “Ridenhour action”), *James v. UMG Recordings, Inc.*, Case No. CV11-01613 SI (the
6 “James Action”) and *Zombie et al. v. UMG Recordings, Inc.*, Case No. CV11-02431 SI (the
7 “Zombie Action”) [Docket No. 75].

8 2. Defendant UMG Recordings, Inc. (“Defendant”) is agreeable to consolidate the
9 Harris Action and *Williams et al. v. UMG Recordings, Inc.*, Case No. CV12-01289-JCS (the
10 “Williams Action”) with the James Action, the Zombie Action and the Ridenhour Action solely for
11 administrative convenience and for no other reason, and on that basis is willing to stipulate to
12 consolidation, on the terms set out herein.

13 3. The parties hereby agree and stipulate that the Harris Action and the Williams Action
14 may be consolidated for all purposes with the James Action, the Zombie Action and the Ridenhour
15 Action, pursuant to Fed. R. Civ. P. 42(a)(2).

16 4. The parties agree and stipulate as a material condition of this stipulation that
17 consolidation of these five actions shall not be used or considered in any manner, directly or
18 indirectly, for any purpose unrelated to consolidation, including but not limited to in connection
19 with any motion concerning class certification. The parties further agree that this stipulation is
20 without prejudice to Defendant’s right to move to sever the actions at such time as Defendant deems
21 such a motion advisable, and Plaintiffs reserve the right to oppose that motion.

22 IT IS SO STIPULATED.

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1 DATED: April 10, 2012

DAVID M. GIVEN
NICHOLAS A. CARLIN
ALEXANDER H. TUZIN
PHILLIPS, ERLEWINE & GIVEN LLP

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3
4
5 By: /s/ David M. Given
DAVID M. GIVEN
Attorneys for Plaintiffs in *James and Zombie*

6 DATED: April 10, 2012

7 MICHAEL W. SOBOL
ERIC B. FASTIFF
ROGER N. HELLER
8 CECILIA HAN
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

9
10 By: /s/ Michael W. Sobol
MICHAEL W. SOBOL
Attorneys for Plaintiffs in *James and Zombie*

11 DATED: April 10, 2012

12 MICHAEL P. LEHMANN
13 BRUCE J. WECKER
14 ARTHUR N. BAILEY, JR.
MICHAEL D. HAUSFELD
15 JAMES J. PIZZIRUSSO
HAUSFELD LLP

16
17 By: /s/ Michael P. Lehmann
MICHAEL P. LEHMANN
Attorneys for Plaintiffs in *Ridenhour and Williams*

18
19 BRUCE L. SIMON
20 AARON M. SHEANIN
WILLIAM J. NEWSOM
21 CLIFFORD H. PEARSON
DANIEL L. WARSHAW
22 PEARSON, SIMON, WARSHAW & PENNY, LLP

23
24 By: /s/ Bruce L. Simon
BRUCE L. SIMON
Attorneys for Plaintiffs in *Ridenhour and Williams*

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DATED: April 10, 2012

EDGAR D. GANKENDORFF
CHRISTOPHE BELA SZAPARY
PROVOSTY & GANKENDORFF, L.L.C.

By: /s/ Edgar D. Gankendorff
EDGAR D. GANKENDORFF
Attorneys for Plaintiffs in *Ridenhour*

DATED: April 10, 2012

NEVILLE L. JOHNSON
DOUGLAS L. JOHNSON
JAMES T. RYAN
JOHNSON & JOHNSON LLP

By: /s/ Neville L. Johnson
NEVILLE L. JOHNSON
Attorneys for Plaintiffs in *Williams*

DATED: April 10, 2012

R. ALEXANDER SAVERI
CADIO ZIRPOLI
MELISSA SHAPIRO
SAVERI & SAVERI, INC.

By: /s/ R. Alexander Saveri
R. ALEXANDER SAVERI
Attorneys for Plaintiffs in *Harris*

DATED: April 10, 2012

BRYAN L. CLOBES
CAFFERTY FAUCHER LLP

By: /s/ Bryan L. Clobes
BRYAN L. CLOBES
Attorneys for Plaintiffs in *Harris*

DATED: April 10, 2012

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

All filings shall be in C-11-1613 only until
otherwise ordered by the Court.

By: /s/ Jeffrey D. Goldman
JEFFREY D. GOLDMAN
Attorneys for Defendant *UMG Recordings, Inc.*

