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8 Attorneys for Defendant
 9 WARNER MUSIC GROUP CORP.

10 Additional Counsel Listed on Signature Pages

11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA
 13 SAN FRANCISCO DIVISION

15 DEBRA SLEDGE, JOAN SLEDGE,
 16 KATHY SLEDGE LIGHTFOOT, KIM
 17 SLEDGE ALLEN, jointly d/b/a "SISTER
 18 SLEDGE," and RONEE BLAKLEY, on
 behalf of themselves and all others
 similarly situated,

19 Plaintiffs,

20 v.

21 WARNER MUSIC GROUP CORP.,

22 Defendant.

CASE NO. 12-CV-0559-RS

RELATED CASES:

- CASE NO. 12-CV-0870-RS
- CASE NO. 12-CV-1531-RS
- CASE NO. 12-CV-1611-RS
- CASE NO. 12-CV-1790-RS

**STIPULATION AND [PROPOSED]
 ORDER EXTENDING DEADLINE TO
 EXCHANGE INITIAL DISCLOSURES**

Judge: Hon. Richard Seeborg

1 Plaintiffs in the following related cases: *Sledge, et al. v. Warner Music Group Corp.*, No.
2 C 12-0559; *Wright v. Warner Music Group Corp.*, No. C 12-00870; *Castillo, et al. v. Warner*
3 *Music Group Corp.*, No. C 12-01531; *Johnston, et al. v. Warner Music Group Corp.*, No. C 12-
4 01611; and *Risko v. Warner Music Group Corp.*, No. C 12-01790 (collectively “Plaintiffs”) and
5 Defendant Warner Music Group Corp. (“Defendant” or “WMG”) hereby stipulate by and through
6 their counsel of record:

7 WHEREAS, the parties held a conference pursuant to Federal Rule of Civil Procedure
8 26(f) on May 1, 2012;

9 WHEREAS, this Court scheduled an initial case management conference in the above-
10 captioned actions on May 24, 2012;

11 WHEREAS, pursuant to this Court’s Order Setting Initial Case Management Conference
12 and ADR Deadlines in the *Sledge* Action, the deadline for the parties to exchange initial
13 disclosures in all of the above-captioned actions is seven days prior to the initial case
14 management conference, or May 17, 2012;

15 WHEREAS, this Court will hear a motion regarding appointment of interim lead counsel
16 for Plaintiffs and a motion to consolidate the above-captioned actions on May 24, 2012;

17 WHEREAS, Plaintiffs have indicated that they intend to file a consolidated amended
18 complaint, pending resolution of the motion to consolidate and the interim lead counsel motion;

19 WHEREAS, the parties agree that in the interests of efficiency, initial disclosures should
20 not be exchanged until after the Plaintiffs’ leadership issues are resolved an a consolidated
21 amended complaint setting forth the operative allegations in the matter is filed;

22 WHEREAS, pursuant to Local Civil Rule 6-1(b), a Court order is necessary to alter the
23 deadline for the exchange of initial disclosures because it was fixed by Court order;

24 IT IS HEREBY STIPULATED THAT:

25 Upon this Court’s order, the deadline for the parties to exchange initial disclosures shall
26 be extended to fourteen days after the filing of any consolidated amended complaint.

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Dated: May 16, 2012

Respectfully Submitted,

/s/ Daniel L. Warshaw
Daniel L. Warshaw
PEARSON, SIMON, WARSHAW & PENNY LLP

*Attorneys for the Sledge and Wright Plaintiffs and the Class**

Dated: May 16, 2012

Respectfully Submitted,

/s/ William M. Audet
William M. Audet
AUDET & PARTNERS, LLP

*Attorneys for the Castillo Plaintiffs and the Class**

Dated: May 16, 2012

Respectfully Submitted,

/s/ Michael W. Sobol
Michael W. Sobol
LIEFF, CABRASER, HEIMANN & BERSTEIN,
LLP

*Attorneys for the Johnston Plaintiffs and the Class**

Dated: May 16, 2012

Respectfully Submitted,

/s/ Bryan L. Clobes
Bryan L. Clobes
CAFFERTY FAUCHER LLP

*Attorneys for the Risko Plaintiffs and the Class**

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Dated: May 16, 2012

Respectfully Submitted,

/s/ Tamerlin J. Godley

Tamerlin J. Godley
MUNGER, TOLLES & OLSON LLP

*Attorneys for Defendant Warner Music Group Corp.**

* A complete list of the attorneys for each party can be seen on each case's docket.

Filer's Attestation

I, Tamerlin J. Godley, am the ECF user whose identification and password are being used to file this STIPULATION EXTENDING DEADLINE TO EXCHANGE INITIAL DISCLOSURES. In compliance with General Order 45.X.B, I hereby attest that the counsel listed above concur in this filing.

DATED: May 16, 2012

/s/ Tamerlin J. Godley
TAMERLIN J. GODLEY

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**DECLARATION OF TAMERLIN J. GODLEY IN SUPPORT OF STIPULATION
EXTENDING DEADLINE TO EXCHANGE INITIAL DISCLOSURES**

I, Tamerlin J. Godley, hereby declare:

1. I am a partner with the firm of Munger, Tolles & Olson LLP, counsel for Defendant Warner Music Group Corp. (“WMG”) in the above-captioned actions.
2. I make this declaration pursuant to Local Civil Rule 6-2(a), in support of the parties’ stipulated request to extend the deadline to exchange initial disclosures.
3. The parties held a conference pursuant to Federal Rule of Civil Procedure 26(f) on May 1, 2012. The current deadline to exchange initial disclosures in the above-captioned actions is May 17, 2012. Pending the Court’s resolution of the motion to appoint interim lead counsel and the motion to consolidate the above-captioned actions, which will both be heard on May 24, 2012, Plaintiffs have indicated that they intend to file a consolidated amended complaint. In the interest of efficiency and in light of the leadership issues to be resolved for Plaintiffs, the parties have agreed to defer the deadline for exchanging initial disclosures until fourteen days after the filing of any consolidated amended complaint.
4. The only previous time modifications in the above-captioned cases were stipulations to extend WMG’s time to respond to the complaint in the *Sledge* and *Castillo* actions.
5. The requested time modification would likely have no impact on the schedule for the above-captioned cases.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed this 16th day of May, 2012, at Los Angeles, California.

/s/ Tamerlin J. Godley
Tamerlin J. Godley

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[PROPOSED] ORDER

Pursuant to the parties' stipulation, the deadline for the parties in *Sledge, et al. v. Warner Music Group Corp.*, No. C 12-0559; *Wright v. Warner Music Group Corp.*, No. C 12-00870; *Castillo, et al. v. Warner Music Group Corp.*, No. C 12-01531; *Johnston, et al. v. Warner Music Group Corp.*, No. C 12-01611; and *Risko v. Warner Music Group Corp.*, No. C 12-01790 to exchange initial disclosures shall be and hereby is extended to fourteen days after Plaintiffs in these actions file a consolidated amended complaint.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 5/17, 2012



The Honorable Richard Seeborg
United States District Judge