

1 MUNGER, TOLLES & OLSON LLP
 2 GLENN POMERANTZ (SBN 112503)
 3 TAMERLIN GODLEY (SBN 194507)
 4 MELINDA E. LEMOINE (SBN 235670)
 5 ANJAN CHOUDHURY (SBN 236039)
 Glenn.Pomerantz@mto.com
 Tamerlin.Godley@mto.com
 Melinda.LeMoine@mto.com
 Anjan.Choudhury@mto.com
 6 355 South Grand Avenue
 7 Thirty-Fifth Floor
 Los Angeles, CA 90071-1560
 Telephone: (213) 683-9100
 Facsimile: (213) 687-3702

8 Attorneys for Defendant
 9 WARNER MUSIC GROUP CORP.

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

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

18 Plaintiffs,

19 v.

20 WARNER MUSIC GROUP CORP.,

21 Defendant.

CASE NO. 12-CV-0559-RS

**JOINT STIPULATION AND ~~[PROPOSED]~~
 SCHEDULING ORDER**

AS MODIFIED BY THE COURT
 Judge: Hon. Richard Seeborg

1 Plaintiffs in the above captioned consolidated action and Defendant Warner Music Group
2 Corp. (“WMG”) together submit the following joint stipulation in regard to the following facts:

3 WHEREAS, on August 21, 2012, Plaintiffs filed a Consolidated Amended Complaint (the
4 “Amended Complaint”);

5 WHEREAS, WMG’s response to the Amended Complaint is currently due September 28,
6 2012;

7 WHEREAS, the parties are all desirous of participating in meaningful settlement
8 discussions before any of the parties expend significant attorneys’ fees in motion practice and
9 discovery;

10 WHEREAS, in light of this joint goal, the parties have met and conferred and agreed that
11 it is in the best interest of the parties and the Court to stay all current deadlines and dates in the
12 litigation for a set period of time sufficient to allow the parties to participate in such settlement
13 negotiations;

14 WHEREAS, the parties anticipate that there will likely need to be certain communications
15 prior to any formal mediation session and that settlement could take multiple mediation sessions
16 to reach agreement if any agreement can be reached;

17 WHEREAS, the parties also anticipate that it may take some time to schedule a mediation
18 session with a mediator given the current schedules of possible mediators; and

19 WHEREAS, for these reasons, the parties anticipate that this process may take upward of
20 six months.

21 Accordingly, the parties hereby agree and stipulate, subject to the approval of the Court, to
22 the following:

A Further Case Management Conference will be set for March 14, 2013 at 10:00 a.m.

- 23 1. ~~All dates and deadlines currently on calendar are taken off calendar;~~
- 24 2. The parties shall have until February 28, 2013 to participate in meaningful
25 mediation of this dispute; and
- 26 3. On February 28, 2013—or before that date if Plaintiffs and/or WMG believe that
27 settlement cannot be reached at this juncture—a party or the parties shall file a
28 statement/stipulation with the Court alerting the Court to the fact that settlement

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

could not be reached and recommending a schedule for WMG’s response to the Amended Complaint (which deadline for WMG’s response shall be no sooner than 30 days from the date of the statement) and subsequent dates and deadlines. In the alternative, if the parties agree that further settlement discussions would be fruitful, the parties can instead file a joint statement/stipulation seeking additional time for further settlement negotiations.

Dated: August 31, 2012

Respectfully Submitted,

/s/ Tamerlin J. Godley

Tamerlin J. Godley
MUNGER, TOLLES & OLSON LLP
Attorneys for Defendant Warner Music Group Corp.

Dated: August 31, 2012

Respectfully Submitted,

/s/ Daniel L. Warshaw

Daniel L. Warshaw
PEARSON, SIMON, WARSHAW & PENNY LLP
*Interim Lead Counsel Representative for Plaintiffs**

* A complete list of the attorneys for Plaintiffs is attached to the Amended Complaint.

Filer’s Attestation

I, Tamerlin J. Godley, am the ECF user whose identification and password are being used to file this STIPULATION AND [PROPOSED] SCHEDULING ORDER. In compliance with General Order 45.X.B., I hereby attest that the counsel listed above concur in this filing.

Dated: August 31, 2012

/s/ Tamerlin J. Godley
Tamerlin J. Godley

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PURSUANT TO THIS STIPULATION, IT IS SO ORDERED.

Dated: 8/31/12



Honorable Ricahrd Seeborg
U.S. District Judge