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 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 STATEMENT/STIPULATION AND
 [PROPOSED] SCHEDULING ORDER**

Judge: Hon. Richard Seeborg

1 Plaintiffs in the above captioned consolidated action and Defendant Warner Music Group
2 Corp. (“WMG”) together submit this joint statement/stipulation.

3 On August 31, 2012, this Court granted a stay of the proceedings to allow the parties to
4 participate in settlement discussions and set a further status conference on March 14, 2013. Over
5 the course of those six months, the parties diligently participated in settlement negotiations. They
6 exchanged information and analysis to facilitate the negotiations. They participated in two full
7 day mediation sessions with the Honorable Daniel Weinstein (Ret.), and they held additional
8 phone conferences with and without the mediator.

9 On February 28, 2013, and April 18, 2013, pursuant to the Court’s stay orders, the parties
10 made further joint filings with the Court reporting on the status of the negotiations and requesting
11 that the case remained stayed because of the ongoing talks. The Court extended the stay each
12 time, setting the current Case Management Conference for June 27, 2013 and asking the parties to
13 make a joint filing regarding the status of the negotiations on or before June 13, 2013. Like the
14 previous orders, the Court’s most recent stay order provided that if, at the time of the filing of the
15 joint statement the parties agreed that further settlement discussions would be fruitful, they could
16 seek additional time for further negotiations. Stay Order at 3.

17 The parties have continued to diligently pursue settlement negotiations. In particular, the
18 parties have participated in numerous phone conferences and a third in-person settlement meeting
19 with the mediator on May 24, 2013. Thereafter, the parties have continued their discussions by
20 phone and email, which discussions are ongoing. While the parties have not reached a settlement
21 at this juncture, the negotiations are constructive and progress has been made. All parties are
22 committed to continuing the settlement discussions at this time.

23 For these reasons, the parties jointly file this statement/stipulation to inform the Court that
24 they believe further settlement discussions would be fruitful and to seek additional time for
25 continued negotiations. Specifically, the parties hereby agree and stipulate, subject to the
26 approval of the Court, to the following:

- 27 1. A further Case Management Conference to be set in 60 days, subject to the
28 schedule of the Court; and

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2. Fourteen days before the Case Management Conference—or before that date if Plaintiffs and/or WMG believe that settlement cannot be reached—the parties shall file a joint statement/stipulation with the Court alerting the Court to the fact that settlement could not be reached and resetting 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 joint 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: June 13, 2013

Respectfully Submitted,

By: /s/ Tamerlin J. Godley
Tamerlin J. Godley
MUNGER, TOLLES & OLSON LLP

*Attorneys for Defendant
Warner Music Group Corp.*

Dated: June 13, 2013

Respectfully Submitted,

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

*Interim Lead Counsel Representative for Plaintiffs**

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

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Filer's Attestation

I, Tamerlin J. Godley, am the ECF user whose identification and password are being used to file this JOINT STATEMENT/STIPULATION AND [PROPOSED] SCHEDULING ORDER. I hereby attest that the counsel listed above concur in this filing.


Dated: June 13, 2013

/s/ Tamerlin J. Godley
Tamerlin J. Godley

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PURSUANT TO THIS STIPULATION, IT IS SO ORDERED.

Dated: 6/19/13



Honorable Richard Seeborg
U.S. District Judge