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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PEARSON, SIMON & WARSHAW, LLP
 44 MONTGOMERY STREET, SUITE 2450
 SAN FRANCISCO, CALIFORNIA 94104

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

Plaintiffs,

vs.

WARNER MUSIC GROUP CORP.,
 Defendant.

CASE NO. CV 12-0559-RS

CLASS ACTION

**JOINT STIPULATION AND [PROPOSED]
 ORDER TO SHORTEN TIME ON
 HEARING FOR PLAINTIFFS'
 UNOPPOSED MOTION FOR LEAVE TO
 WITHDRAW AS COUNSEL FOR
 PLAINTIFFS DEBRA SLEDGE, JOAN
 SLEDGE, AND KIM SLEDGE ALLEN**

Judge: Hon. Richard Seeborg

1 Plaintiffs and Defendant hereby enter the following Joint Stipulation and [Proposed] Order
2 to Shorten Time on the Hearing for Plaintiffs’ Unopposed Motion for Leave to Withdraw as
3 Counsel for Plaintiffs Debra Sledge, Joan Sledge, and Kim Sledge Allen (“Motion to Withdraw”):

4 WHEREAS, Plaintiffs filed their unopposed Motion to Withdraw on December 5, 2013
5 with a noticed hearing date of January 9, 2014 (Dkt. 82);

6 WHEREAS, the parties do not expect any opposition or reply to the Motion to Withdraw;

7 WHEREAS, on August 31, 2012, this Court granted a stay of the proceedings to allow the
8 parties to participate in settlement discussions, which stay has been extended through December
9 12, 2013;

10 WHEREAS, over the course of this time, the parties have diligently participated in
11 settlement negotiations, and while they have not reached a settlement at this juncture, the
12 negotiations are constructive and progress has been made. All parties are committed to continuing
13 the settlement discussions at this time;

14 WHEREAS, to the extent settlement can be reached, the parties would hope to obtain an
15 order granting preliminary approval of any settlement by February 1, 2014, so that notice of the
16 settlement could be disseminated to class members with Defendant’s next mailing cycle of royalty
17 statements;

18 WHEREAS, to the extent settlement can be reached, failure to send notice in that mailing
19 cycle could result in a delay of six months or more in providing notice to the class and cause
20 further delay;

21 WHEREAS, the Motion to Withdraw must be addressed by the Court before settlement
22 can be reached or any motion for preliminary approval filed;

23 WHEREAS, this request for an order shortening time will not have a negative effect on the
24 schedule for the case since this Court has stayed proceedings to allow the parties to participate in
25 settlement negotiations;

26 WHEREAS, there is already a Case Management Conference scheduled in this case for
27 December 12, 2013, at 10:00 am.

28 PURSUANT TO CIVIL LOCAL RULE 6-2, THE PARTIES HEREBY STIPULATE that

1 the hearing, if any, on Plaintiffs' unopposed Motion to Withdraw shall be heard on December 12,
2 2013, at 1:30 p.m.

3 **IT IS SO STIPULATED.**

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5 DATED: December 5, 2013

Respectfully Submitted,

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7 By: /s/ Daniel L. Warshaw

Daniel L. Warshaw

8 **PEARSON, SIMON & WARSHAW, LLP**

9 *Interim Lead Counsel Representative for Plaintiffs*

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11 DATED: December 5, 2013

Respectfully Submitted,

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13 By: /s/ Tamerlin J. Godley

Tamerlin J. Godley

14 **MUNGER, TOLLES & OLSON LLP**

15 *Attorneys for Defendant Warner Music Group Corp.*

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18
19 Filer's Attestation

20 I, Daniel L. Warshaw, am the ECF user whose identification and password are being used
21 to file this JOINT STIPULATION AND [PROPOSED] ORDER TO SHORTEN TIME ON
22 HEARING FOR PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO WITHDRAW AS
23 COUNSEL FOR PLAINTIFFS DEBRA SLEDGE, JOAN SLEDGE, AND KIM SLEDGE
24 ALLEN. I hereby attest that the counsel listed above concur in this filing.

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26 DATED: December 5, 2013

 /s/ Daniel L. Warshaw

Daniel L. Warshaw

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1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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3 Dated: 12/9/13



4 Honorable Richard Seeborg
5 United States District Court Judge

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