

1 Bruce L. Simon (Bar No. 96241)
PEARSON, SIMON & WARSHAW, LLP
 2 44 Montgomery Street, Suite 2450
 San Francisco, California 94104
 3 Telephone: (415) 433-9000
 Facsimile: (415) 433-9008
 4 Email: bsimon@pswlaw.com

5 Attorneys for Plaintiffs and the Class
 6 [Additional counsel appear on signature pages]

7
UNITED STATES DISTRICT COURT
 8
NORTHERN DISTRICT OF CALIFORNIA
 9

10 IN RE: WARNER MUSIC GROUP CORP.
 11 DIGITAL DOWNLOADS LITIGATION

CASE NO. CV 12-0559-RS

**LOCAL RULE 6-2 JOINT STIPULATION
 TO SHORTEN TIME FOR HEARING
 MOTION FOR PRELIMINARY
 APPROVAL OF CLASS SETTLEMENT**

Judge: Hon. Richard Seeborg

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

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 Pursuant to Local Rule 6-2, Plaintiffs Kathy Sledge Lightfoot, Gary Wright and Ronee
2 Blakley in the above captioned consolidated action and Defendant Warner Music Group Corp.
3 (“WMG”) (collectively referred to as “the Parties”) together submit the following joint stipulation
4 in regard to the following facts:

5 WHEREAS, the Parties have been negotiating a settlement of this putative class action for
6 many months;

7 WHEREAS, the details of the settlement of any class action are detailed and take extensive
8 negotiations, particularly where, as here, the settlement contemplated involves both payment for
9 past relief and increased royalty rates in the future;

10 WHEREAS, the Parties have now agreed to a proposed settlement of the matter, subject to
11 the approval of the Court, and Plaintiffs have concurrently filed with this stipulation a Notice of
12 Motion and Motion For Preliminary Approval of Class Action Settlement (the “Motion”);

13 WHEREAS, the currently scheduled hearing date for the Motion is February 6, 2014;

14 WHEREAS, the Parties agreed to provide notice to potential class members of the
15 settlement, if it is preliminarily approved, with their individually mailed royalty statements;

16 WHEREAS, the next mailing of WMG’s royalty statements is for the period ending
17 December 31, 2013, which mailing should begin on or around February 15, 2014;

18 WHEREAS, the Parties endeavored to complete their negotiations in time to allow 35 days
19 between the filing of the Motion and the hearing on the Motion as required by the Local Rules and
20 still allow for notice to be mailed with the potential class members’ upcoming royalty statements;

21 WHEREAS, because of the many issues that needed to be negotiated and agreed upon the
22 Parties were unable to meet the 35-day deadline and still provide for notice to potential class
23 members in the upcoming royalty statements;

24 WHEREAS, to address this issue, the Parties have agreed, subject to the Court’s approval,
25 to shorten the time from the filing of the Motion to the hearing on the Motion so that the hearing
26 can be set for January 23, 2014;

27 Accordingly, the Parties hereby agree and stipulate, subject to the approval of the Court, to
28 the following:

1 The time for hearing Plaintiffs' Motion for Preliminary Approval of Class Action
2 Settlement under Local Rule 7-2 shall be shortened and the Motion shall be set for hearing on
3 January 23, 2014.

4
5 Dated: December 30, 2013

Respectfully Submitted,

6
7 /s/ Tamerlin J. Godley

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

11 Dated: December 30, 2013

Respectfully Submitted,

12
13 /s/ Daniel L. Warshaw

14 Daniel L. Warshaw
15 PEARSON, SIMON & WARSHAW, LLP

16 *Interim Lead Counsel Representative for Plaintiffs**

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

18 Filer's Attestation

19 I, Daniel L. Warshaw, am the ECF user whose identification and password are being used
20 to file this JOINT STIPULATION RE MOTION TO SHORTEN TIME FOR HEARING THE
21 PARTIES' JOINT MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT.
22 In compliance with General Order 45.X.B., I hereby attest that the counsel listed above concur in
23 this filing.

24
25 Dated: December 30, 2013

/s/ Daniel L. Warshaw
Daniel L. Warshaw

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

2

3 Dated: 1/2/14



Honorable Richard Seeborg
United States District Court Judge

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

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