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 13 *Twentieth Century Fox Film Corporation,*  
 14 *Universal City Studios LLC, and Warner Bros.*  
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*Attorneys for Plaintiff Timothy Forsyth*

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

17 TIMOTHY FORSYTH, individually and on behalf of a  
 18 class of similarly situated individuals,

19 Plaintiff,

20 vs.

21 MOTION PICTURE ASSOCIATION OF  
 AMERICA, INC., WALT DISNEY STUDIOS  
 22 MOTION PICTURES, PARAMOUNT  
 PICTURES CORPORATION, SONY  
 PICTURES ENTERTAINMENT INC.,  
 23 TWENTIETH CENTURY FOX FILM  
 CORPORATION, UNIVERSAL CITY  
 24 STUDIOS LLC, WARNER BROS.  
 ENTERTAINMENT INC., and NATIONAL  
 25 ASSOCIATION OF THEATRE OWNERS,

26 Defendants.  
 27  
 28

Case No. 3:16-cv-00935-RS

**STIPULATION AND  
~~PROPOSED~~ ORDER RE  
 ENTRY OF JUDGMENT AND  
 DEFENDANTS' DEADLINE TO  
 FILE MOTION FOR  
 ATTORNEYS' FEES**

Judge: Hon. Richard Seeborg

1 Plaintiff Timothy Forsyth and Defendants Motion Picture Association of America Inc.,  
2 Walt Disney Studios Motion Pictures, Paramount Pictures Corporation, Sony Pictures  
3 Entertainment Inc., Twentieth Century Fox Film Corporation, Universal City Studios LLC,  
4 Warner Brothers Entertainment Inc., and the National Association of Theatre Owners, by and  
5 through their undersigned counsel of record, stipulate as follows:

6 A. On November 10, 2016, the Court granted Defendants' special motion to strike and  
7 motion to dismiss with leave to amend.

8 B. Plaintiff does not intend to amend the complaint. Accordingly, Defendants request that  
9 the Court enter judgment pursuant to Rule 58.

10 C. The parties further stipulate that, pursuant to Rule 54(d)(2)(B) and Local Rule 54-5(a),  
11 Defendants shall have fourteen days from the Court's entry of judgment to file a motion for  
12 attorney's fees.

13 **IT IS SO STIPULATED.**

14  
15 DATED: November 22, 2016

LAW OFFICES OF DAVID SCHACHMAN, P.C.

17 By:           /s/ David Schachman            
18 DAVID SCHACHMAN

19 Attorneys for Plaintiff Timothy Forsyth

20 DATED: November 22, 2016

MUNGER, TOLLES & OLSON LLP

22 By:           /s/ Kelly M. Klaus            
23 KELLY M. KLAUS

24 Attorneys for Defendants Motion Picture Association of  
25 America, Inc., Walt Disney Studios Motion Pictures,  
26 Paramount Pictures Corporation, Sony Pictures  
27 Entertainment Inc., Twentieth Century Fox Film  
28 Corporation, Universal City Studios LLC, and Warner  
Bros. Entertainment Inc.

1 DATED: November 22, 2016

BRYAN CAVE LLP

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By:           /s/ K. Lee Marshall            
K. LEE MARSHALL


Attorneys for Defendant National Association of  
Theatre Owners

Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that all signatories concur with this filing.

By:           /s/ K. Lee Marshall          

THE COURT FINDS GOOD CAUSE EXISTS FOR THE PARTIES' STIPULATION AND ON  
THAT BASIS THE FOREGOING STIPULATION IS APPROVED AND IS SO ORDERED.

DATED:   11/28/16                          

  
\_\_\_\_\_  
HONORABLE RICHARD SEEBORG  
UNITED STATES DISTRICT JUDGE