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1	JEFFREY G. KNOWLES (State Bar No. 129754)			
	JULIA D. GREER (State Bar No. 200479)			
2	SCOTT C. HALL (State Bar No. 232492)			
	COBLENTZ PATCH DUFFY & BASS LLP			
3	One Montgomery Street, Suite 3000			
	San Francisco, California 94104-5500			
4	Telephone: 415.391.4800			
	Facsimile: 415.989.1663			
5	Email: ef-jgk@cpdb.com,			
	ef-jdg@cpdb.com,			
6	ef-sch@cpdb.com			
_				
7	Attorneys for Plaintiffs			
	ARISTA MUSIC, ARISTA RECORDS, LLC,			
8	LAFACE RECORDS LLC, SONY MUSIC			
	ENTERTAINMENT, SONY MUSIC			
9	ENTERTAINMENT US LATIN LLC, AND			
10	ZOMBA RECORDING, LLC			
10	[Additional Councel Listed On Cignature Deceal			
	[Additional Counsel Listed On Signature Pages]			
11				
12	LIMITED STATES D			
14	UNITED STATES D			

## DISTRICT COURT

## NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

ARISTA MUSIC, ARISTA RECORDS, LLC, LAFACE RECORDS LLC, SONY MUSIC ENTERTAINMENT, SONY MUSIC ENTERTAINMENT US LATIN LLC, AND ZOMBA RECORDING LLC,

Plaintiffs,

v.

RADIONOMY, INC., RADIONOMY SA, RADIONOMY GROUP, B.V., and ALEXANDRE SABOUNDJIAN, an individual,

Defendants.

Case No. 3:16-cv-00951 RS

JOINT STIPULATION AND [PROPOSED] ORDER REGARDING CONSOLIDATED OPPOSITION BRIEF OF PLAINTIFFS ARISTA MUSIC, ARISTA RECORDS, LLC, LAFACE RECORDS LLC, SONY MUSIC ENTERTAINMENT, SONY MUSIC ENTERTAINMENT US LATIN LLC, AND ZOMBA RECORDING LLC IN RESPONSE TO DEFENDANTS' MOTIONS TO DISMISS

Judge: Hon. Honorable Richard Seeborg

Dept.: Courtroom 3, 17th Floor

Trial Date: None Set

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The undersigned counsel for Arista Music, Arista Records, LLC, Laface Records LLC, Sony Music Entertainment, Sony Music Entertainment US Latin LLC, and Zomba Recording LLC (collectively, "Plaintiffs") and Defendants Radionomy Inc., Radionomy S.A., specially appearing Defendant Radionomy Group B.V., and specially appearing Defendant Alexandre Saboundjian (collectively, "Defendants") in the above-captioned action hereby stipulate and agree, pursuant to Civil Local Rule 7-12, as follows:

WHEREAS, on May 9, 2016, Defendants Radionomy Inc., Radionomy S.A. and Radionomy Group B.V. filed a motion to dismiss pursuant to Fed. R. Civ. P. 12(b)(2) and/or 12(b)(6);

WHEREAS, on May 9, 2016, Defendant Alexandre Saboundjian filed a motion to dismiss pursuant to Fed. R. Civ. P. 12(b)(2) and 12(b)(6);

WHEREAS, Plaintiffs' responses to Defendants' motions are currently due on May 23, 2016;

WHEREAS, pursuant to Civil Local Rule 7-3, Plaintiffs may file an opposition of up to twenty-five (25) pages in length of text in response to each of Defendants' motions to dismiss;

WHEREAS, Plaintiffs believe that, because of the overlapping facts and arguments raised in Defendants' motions, efficiency will be served by a single, consolidated opposition brief of up to thirty-five (35) pages in length;

NOW, THEREFORE, IT IS HERBY STIPULATED by and between Plaintiffs and Defendants, through their respective counsel that:

1. Plaintiffs may file a single, consolidated opposition brief in response to Defendants' motions to dismiss of up to thirty-five (35) pages in length of text.

## IT IS SO STIPULATED.

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1	DATED: May 19, 2016	COBLENTZ PATCH DUFFY & BASS LLP		
2				
3		By: /s/ Jeffrey G. Knowles		
4		Jeffrey G. Knowles		
5		Attorneys for Plaintiffs ARISTA MUSIC, ARISTA RECORDS, LLC,		
6		LAFACE RECORDS LLC, SONY MUSIC ENTERTAINMENT, SONY MUSIC		
7		ENTERTAINMENT US LATIN LLC, ADN ZOMBA RECORDING, LLC		
8		ZOMBA RECORDING, EEC		
9	Detail: May 10, 2016	WEIL COTCHAL & MANGEGLID		
10	Dated: May 19, 2016	WEIL, GOTSHAL & MANGES LLP		
11		Dan /-/ Danid D. Cinal		
12		By: <u>/s/ David R. Singh</u> David R. Singh		
13		WEIL, GOTSHAL & MANGES LLP		
14		Silicon Valley Office 201 Redwood Shores Parkway		
15		Redwood Shores, CA 94065 Telephone: 650-802-3000		
16		Facsimile: 650-802-3100		
17		BENJAMIN E. MARKS (pro hac vice to be filed) benjamin.marks@weil.com		
18		GREGORY SILBERT (application for admission		
19		to be filed) gregory.silbert@weil.com		
20		WEIL, GOTSHAL & MANGES LLP 767 Fifth Avenue		
21		New York, New York 10153-0119		
22		Telephone: 212-310-8000 Facsimile: 212-310-8007		
23		Attorneys for Defendants RADIONOMY, INC.,		
24		RADIONOMY SA, and RADIONOMY GROUP, B.V.		
25				
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27				
28				
	11325.004 3452407v1	3 3:16-cv-00951 RS		
	JOINT STIPULATION FOR EXTENSION OF TIME FOR PLAINTIFFS			

1	1 Dated: May 19, 2016 ROP	ERS, MAJESKI, KOHN & BENTLEY		
2	$2 \parallel$			
3	3 By: _	/s/ Todd A. Roberts Todd A. Roberts		
4	4			
5	II .	ERS, MAJESKI, KOHN & BENTLEY Marshall Street, Suite 500		
	Redv	vood City, CA 94063-2052		
6	Face	phone: 650-364-8200 mile: 650-780-1701		
7	/			
8	8 Attor	rneys for Defendant Alexandre Saboundjian		
9	9			
10				
11	ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1			
12	I, Jeffrey Knowles, am the ECF user whose identification and password are being used to			
13	file this Joint Stipulation for Extension of Time for Defendants To Respond to Complaint. In			
14	compliance with Civil Local Rules 5-1(c)(4) and 5-1(i)(3), I hereby attest that David R. Singh and			
15	Todd A. Roberts concurred in this filing.			
16	Dated: Way 19, 2010	Jeffrey G. Knowles		
17	17	effrey G. Knowles		
18	18			
19	19			
20	20 [PROPOSED] (	[PROPOSED] ORDER		
21	PURSUANT TO STIPULATION, IT IS SO	PURSUANT TO STIPULATION, IT IS SO ORDERED.		
22	22	0110.		
23	Dated: 5/20/16	Will Selm		
24	24	Honorable Richard Seeborg		
25		United States District Judge		
26				
27				
28	28			