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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

DONNA CORBELLO,  
  
Plaintiff,  
  
vs.  
  
THOMAS GAETANO DEVITO, *et al.*,  
  
Defendants.

Case No. 2:08-cv-00867-RCJ-PAL

**STIPULATION RE: TESTIMONY OF  
EDWARD STRONG**

The parties hereby stipulate that Edward Strong, an officer of Dodger Theatricals Ltd. who resides in New York City, New York, would give the following testimony if called to testify

1 at trial, and the jury should consider the following statements as having been made under oath by  
2 Mr. Strong:

3 1. Edward Strong is the Secretary, Treasurer, and Co-Owner of Dodger Theatricals,  
4 Ltd. (“Dodger”).

5 2. Edward Strong reaffirms the following facts from the “business structure”  
6 stipulation previously read to the jury:

7 a. Defendants Fankie Valli, Robert J. Gaudio, Marshall Brickman, and Eric S.  
8 Elice (collectively, “the Authors”) jointly own all relevant rights in the play  
9 *Jersey Boys*.

10 b. The Authors conveyed to Defendant Dodger Theatricals Ltd. (“Dodger”) the  
11 exclusive right to develop, produce and present the live stage production of  
12 *Jersey Boys*, as reflected in a production agreement dated May 1, 2004 and  
13 fully executed on or around October 12, 2005 (hereafter the “Production  
14 Agreement”). This transfer of rights included rights Dodger obtained from  
15 third parties, including rights obtained under the agreement that Frankie  
16 Valli, Robert Gaudio, Nicholas Macioci, and Thomas DeVito executed some  
17 time in 1999 (hereafter the “1999 Agreement”).

18 c. Attached as an exhibit to the Production Agreement was the 1999  
19 Agreement. (Plaintiff’s Trial Exhibit No. 163.) The 1999 Agreement lapsed  
20 on December 10, 2004.

21 3. Among other things, the 1999 Agreement conveyed certain life rights, including  
22 the right to use name, likeness and biographies (from whatever sources) of Messrs. Massi and  
23 DeVito to Messrs. Valli and Gaudio, in connection with the creation of *Jersey Boys*. The rights  
24 transferred by Mr. DeVito pursuant to the 1999 Agreement reverted back to Mr. DeVito on  
25 December 10, 2004, when the 1999 Agreement lapsed.

26 4. Sometime after the paid public performances of *Jersey Boys* began on Broadway  
27 in October 2005, Dodger (or its licensee) has paid, and continues to make payments to Mr.  
28 DeVito derived from the amount or percentage stated in the 1999 Agreement.

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IT IS SO STIPULATED:

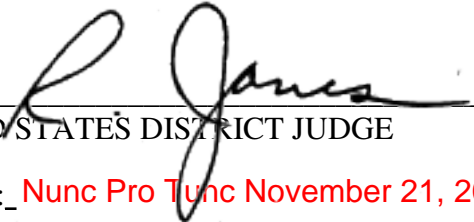
By: /s/Robert H. McKirgan  
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IT IS SO ORDERED.

  
\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE  
DATED: Nunc Pro Tunc November 21, 2016

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**CERTIFICATE OF SERVICE/NOTICE OF ELECTRONIC FILING**

Pursuant to Local Rule 5-4, I certify that on November 21, 2016, I electronically filed and served the foregoing document using the Court’s CM/ECF electronic filing system on all counsel of record in this matter.

*/s/June Yourgulez* \_\_\_\_\_