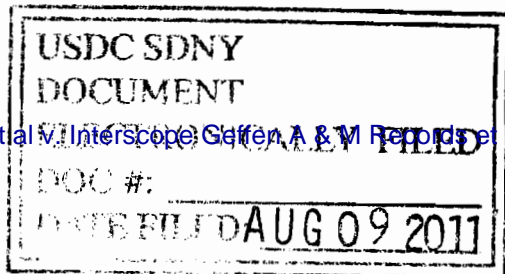


Domino Recording Company, Inc. et al v. Interscope Geffen A & M Records et al

Doc. 45



JENNER & BLOCK

August 8, 2011

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VIA FACSIMILE

Honorable George B. Daniels  
United States District Court  
Southern District of New York  
500 Pearl Street, Courtroom 21D  
New York, New York 10007

**SO ORDERED**  
The conference is adjourned to  
October 18, 2011 at 9:30 a.m.  
AUG 09 2011  
*George B. Daniels*  
HON. GEORGE B. DANIELS

**Re: Domino Recording Company, Inc., et al. v. Interscope Geffen A&M Records, et al.,  
Case No.: 09 CV 8400 (GBD)**

Dear Judge Daniels:

I write on behalf of all parties to respectfully request an adjournment of the status conference scheduled for August 16, 2011 at 9:30 a.m., and an extension of the deadline to complete liability discovery, which is currently August 10, 2011. The parties have been engaged in liability discovery. However, due to the location and other professional commitments of the witnesses involved in this case (foreign nationals and professional musicians currently on tour), the parties will not be able to complete the remaining liability discovery by the current deadline.

The parties have agreed that all of Plaintiffs' outstanding document production, including production of all documents responsive to the September 1, 2010 subpoena issued to Ulrich Schnauss, will be completed by August 12, 2011. Once Plaintiffs have completed their document production, the parties will promptly confer and schedule dates for the Rule 30(b)(6) depositions of the plaintiffs, to be held in New York. The parties have further agreed that the deposition of defendant Christopher Pitman will be scheduled for a date that accommodates his schedule, and, if necessary, the depositions of the other defendants on liability issues will be scheduled following Mr. Pitman's deposition.

Accordingly, the parties agreed that it would be appropriate to request an extension of liability discovery through October 10, 2011 and an adjournment of the August 16 status conference to Tuesday, October 18, 2011 or some other time that is convenient to the Court. We respectfully submit a Revised Scheduling Order to that effect and jointly request that Your Honor *so order* the Revised Scheduling Order.

We thank the Court for its consideration.

Respectfully submitted,

Andrew H. Bart

Honorable George B. Daniels  
August 8, 2011  
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Enclosure

cc: Jonathan Ross, Esq. *(via facsimile w/encl.)*