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11 his Guardian Ad Litem Thomas F. Willisch

12 UNITED STATES DISTRICT COURT
13 CENTRAL DISTRICT OF CALIFORNIA

14 J.W., a minor by and through his
15 Guardian Ad Litem Thomas F.
16 Willisch,

17 Plaintiff,

18 vs.

19 JARAD HIGGINS, professionally
20 known as JUICE WRLD; NICK
21 MIRA; GRADE A
22 PRODUCTIONS; INTERSCOPE
23 RECORDS; UNIVERSAL MUSIC
24 GROUP RECORDINGS, INC., aka
25 UMG RECORDINGS INC.,

26 Defendants.

Case Number 2:19-cv-06007 SB (AFMx)

**STIPULATION TO CONTINUE
TRIAL AND ALL PRETRIAL DATES
AND DEADLINES**

**[FILED CONCURRENTLY WITH
DECLARATION OF JOHN
JUENGER; [PROPOSED] ORDER]**

27 WHEREAS, this action for copyright infringement was filed on July 12, 2019;
28 WHEREAS, Defendant Jarad Higgins (“Higgins”), professional known as Juice
Wrld, died on or about December 8, 2019;

WHEREAS, on February 20, 2020, counsel for Defendants filed a motion to
stay the action pending the appointment of a representative for Higgins’ estate [*Dkt.*
No. 35], which was granted on March 23, 2020 [*Dkt. No. 45*];

WHEREAS, on May 28, 2020, Plaintiff filed a motion to substitute the Estate
of Jarad Anthony Higgins, by and through its Personal Representative Carmela

1 Wallace in place of Higgins [*Dkt. No. 49*], which was granted on June 25, 2020 [*Dkt.*
2 *No. 52*];

3 WHEREAS, on August 21, 2020, the Court issued a summons for the Estate
4 of Jarad Anthony Higgins by and through its Personal Representative Carmela
5 Wallace [*Dkt. No. 54*], which was personally served on August 25, 2020 [*Dkt. No.*
6 *55*];

7 WHEREAS, the Estate of Higgins answered the Complaint on September 15,
8 2020[*Dkt. No. 58*];

9 WHEREAS, the parties have exchanged written discovery, but have not yet
10 exchanged documents, in part because there has been difficulty obtaining documents
11 from the corporate defendants in light of the COVID-19 pandemic and associated
12 complications;

13 WHEREAS, the parties need to conduct depositions, but have been unable to
14 hold them due to the inability to exchange documents, and because the parties believe
15 that in-person depositions are necessary in light of various issues in this action;

16 WHEREAS, the parties therefore seek to continue trial and all other dates and
17 deadlines in this action;

18 WHEREAS, the parties previously requested and were granted a continuance
19 of the trial and other dates by Dale S. Fischer, who was previously assigned to this
20 matter [*Dkt. No. 57*];

21 WHEREAS, the parties have been diligent in seeking the continuance, and
22 there will be prejudice if the continuance is denied because the parties need additional
23 time to conduct discovery and retain experts:

24 IT IS HEREBY STIPULATED AND AGREED, and the parties respectfully
25 request, that the trial and all pretrial dates be continued as follows, or whatever time
26 period thereafter is convenient for the Court:

- 27 • Jury Trial (Est. 4-6 days): August 17, 2021 at 8:30 AM
28 [Prior Date: May 4, 2021]

- 1 • Final Pre-Trial Conference: July 14, 2021 at 3:00 PM
- 2 [Prior Date: April 5, 2021]
- 3 • Lodge Pretrial Conference Order, etc.: June 29, 2021
- 4 [Prior Date: March 23, 2021]
- 5 • Lodge Memorandum of Contentions, etc.: July 6, 2021
- 6 [Prior Date: March 16, 2021]
- 7 • ADR Cut-Off: May 28, 2021
- 8 [Prior Date: February 10, 2021]
- 9 • Motion Cut-Off: May 3, 2021
- 10 [Prior Date: January 25, 2021]
- 11 • Expert Witness Exchange Deadline
- 12 Initial: March 23, 2021
- 13 Rebuttal: May 4, 2021
- 14 Expert Witness Discovery Cut-Off: June 29, 2021
- 15 [Prior Date: March 10, 2021]
- 16 • Discovery Cut-Off: April 2, 2021
- 17 [Prior Date: December 18, 2020]

18 IT IS SO STIPULATED.

19 Dated: November 16, 2020

GUTMAN LAW

20 By: /s/ John Juenger
 21 John Juenger
 22 Attorneys for Plaintiff
 23 J.W., a minor by and through his Guardian Ad
 Litem Thomas F. Willisch

24 Dated: November 16, 2020

MELONI & MCCAFFREY, A Professional Corporation

25 By: /s/ Robert S. Meloni
 26 Robert S. Meloni
 27 Attorneys for Defendants Grade A Productions,
 Interscope Records and UMG Recordings, Inc.

28 //

1 Dated: November 16, 2020

LAW OFFICES OF MAX J. SPRECHER

2

By: /s/ Max J. Sprecher
Max J. Sprecher

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Attorneys for Defendants Grade A Productions,
Interscope Records and UMG Recordings, Inc.

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Pursuant to Local Rule 5-4.3.4(a)(2)(i), the filer of this document hereby attests

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that all signatories concur in the filing of this document.

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