

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

SPENCER ELDEN

Plaintiff,

v.

NIRVANA, L.L.C.;  
UNIVERSAL MUSIC GROUP, INC.;  
THE DAVID GEFFEN COMPANY;  
GEFFEN RECORDS; WARNER RECORDS, INC.;  
MCA MUSIC, INC.;  
KIRK WEDDLE;  
KURT COBAIN, DECEASED;  
COURTNEY LOVE, AS EXECUTOR OF THE ESTATE  
OF KURT COBAIN;  
HEATHER PARRY, AS MANAGER OF THE ESTATE  
OF KURT COBAIN;  
GUY OSEARY, AS MANAGER OF THE ESTATE  
OF KURT COBAIN;  
KRIST NOVOSELIC;  
CHAD CHANNING;  
DAVID GROHL; and  
ROBERT FISHER

Defendants.

Case No: 2:21-cv-06836

**STIPULATION AND ORDER RE  
SERVICE AND FILING OF FIRST  
AMENDED COMPLAINT**

**WHEREAS** on August 24, 2021, Plaintiff SPENCER ELDEN (“Plaintiff”), through his attorneys, Marsh Law Firm PLLC, filed this action against defendants NIRVANA, L.L.C.; UNIVERSAL MUSIC GROUP, INC.; THE DAVID GEFFEN COMPANY; GEFFEN RECORDS; MCA MUSIC, INC.; KIRK WEDDLE; KURT COBAIN, DECEASED; COURTNEY LOVE, AS EXECUTOR OF THE ESTATE OF KURT COBAIN; KRIST NOVOSELIC; CHAD CHANNING; DAVID GROHL (Collectively, “Nirvana Defendants”); WARNER RECORDS, INC., HEATHER PARRY AS MANAGER OF THE ESTATE OF KURT

COBAIN, GUY OSEARY AS MANAGER OF THE ESTATE OF KURT COBAIN, and  
ROBERT FISHER (“Defendants”),

**WHEREAS** Plaintiff has not yet served any Nirvana Defendant,

**WHEREAS** no Nirvana Defendant has answered or otherwise moved in response to the  
Complaint,

**WHEREAS** the Plaintiff and Nirvana Defendants have attempted to resolve the dispute  
by mediation.

**WHEREAS** Plaintiff alleges that he intends to file a First Amended Complaint on or  
before November 22, 2021, and

**WHEREAS** counsel for the undersigned has represented that the successor-in-interest to  
Defendants Universal Music Group Inc., The David Geffen Company, and MCA Music, Inc. is  
the UMG Recordings, Inc. and that they represent UMG Recordings, Inc.

**THEREFORE, IT IS HEREBY STIPULATED** by the Plaintiff and Nirvana  
Defendants that:

1. Plaintiff may file his First Amended Complaint on or before November 22, 2021,
2. The undersigned attorney for the Nirvana Defendants is authorized to and will  
accept service of Plaintiff’s original Complaint and Plaintiff’s First Amended  
Complaint on behalf of the Nirvana Defendants,
3. Plaintiff may effect service by email transmission to the undersigned attorneys at  
the email addresses listed below, and such email service shall be deemed good  
and proper,
4. Plaintiff will serve counsel for the Nirvana Defendants coincident with the filing  
of the First Amended Complaint in the manner set forth above, and

5. Facsimile or scanned signatures on this stipulation will have the same force and effect as original signatures.
6. The Nirvana Defendants shall answer or otherwise move in response to the Amended Complaint on or before January 21, 2022.

Dated: November 4, 2021

MARSH LAW FIRM, PLLC

/s/

Robert Y. Lewis  
31 Hudson Yards, 11<sup>th</sup> Floor  
New York, New York 10001  
Phone: 212-372-3030  
Email: [RobertLewis@marsh.law](mailto:RobertLewis@marsh.law)

*Attorney for Plaintiff*

Dated: November 4, 2021

KENDALL BRILL & KELLY LLP

/s/

Bert H. Deixler  
10100 Santa Monica Blvd #1725  
Los Angeles, CA 90067  
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*Attorney for Defendants*

Nirvana, L.L.C.; UMG Recordings, Inc. as successor-in-interest to Universal Music Group, Inc.; The David Geffen Company; MCA Music, Inc; Geffen Records; Kirk Weddle; Kurt Cobain, Deceased; Courtney Love, as Executor of the Estate of Kurt Cobain; Krist Novoselic; Chand Channing; and David Grohl

SO ORDERED

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Fernando M. Olguin  
USDC Judge