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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

UMG RECORDINGS, INC., CAPITOL
 RECORDS, LLC, CONCORD BICYCLE
 ASSETS, LLC, CMGI RECORDED MUSIC
 ASSETS LLC, SONY MUSIC
 ENTERTAINMENT, and ARISTA MUSIC

Plaintiff(s),

vs.

INTERNET ARCHIVE, BREWSTER
 KAHLE, KAHLE/AUSTIN FOUNDATION,
 GEORGE BLOOD, and GEORGE BLOOD,
 L.P.

Defendant(s).

) Case No.: 3:23-cv-06522-MMC

) **Stipulation and Proposed Order to Stay the**
) **Case for Thirty Days**

Pursuant to Civil Local Rule 6-1(b) and Section 7 of the Court's Standing Orders, Plaintiffs UMG Recordings, Inc., Capitol Records, LLC, Concord Bicycle Assets, LLC, CMGI Recorded Music Assets LLC, Sony Music Entertainment, and Arista Music ("collectively, "Plaintiffs") and Defendants Internet Archive, Brewster Kahle, the Kahle/Austin Foundation, George Blood, and George Blood LP (collectively, "Defendants") (Plaintiffs and Defendants shall collectively be referred to as the "Parties"), hereby stipulate as follows:

WHEREAS, Plaintiffs noticed their Motion for Leave to File the Second Amended Complaint ("Motion") for hearing on April 11, 2025, ECF No. 159;

WHEREAS, the Parties have engaged in and made significant progress in settlement discussions and believe a thirty (30) day stay of proceedings will facilitate resolution of this matter;

WHEREAS, the Parties are optimistic that settlement discussions may be successful and that this case can be dismissed;

WHEREAS, in the event that settlement discussions do not result in a resolution, the Parties agree to confer and submit a proposed schedule to the Court to reset case deadlines;

NOW, THEREFORE, the Parties hereby stipulate and respectfully request the Court to order as follows:

1. The hearing on Plaintiffs' Motion noticed for April 11, 2025 is VACATED.
2. This case shall be stayed for thirty (30) days from the date of entry of this Order to allow the Parties to continue their settlement discussions.
3. If the settlement discussions result in a resolution, the Parties will promptly file an appropriate dismissal with the Court.
4. If the settlement discussions are not successful, the Parties shall meet and confer to propose a new schedule for the case and submit a joint proposed scheduling order to the Court within ten (10) days following the expiration of the stay.

IT IS SO STIPULATED.

1 Dated: April 4, 2025

2 /s/ Matthew J. Oppenheim

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 28 ***Capital Records, LLC; Concord Bicycle Assets,***
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/s/ Andrew M. Gass

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Brewster Kahle, Kahle/Austin Foundation,
George Blood, and George Blood L.P.

SIGNATURE ATTESTATION

Pursuant to Civ. L.R. 5.1, I hereby attest that I have obtained the concurrence in the filing of this document from all the signatories for whom a signature is indicated by a “conformed” signature (/s/) within this e-filed document and I have on file records to support this concurrence for subsequent production for the Court if so ordered for inspection upon request.

Dated: April 4, 2025

OPPENHEIM + ZEBRAK, LLP

/s/Matthew J. Oppenheim

Matthew J. Oppenheim

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UMG RECORDINGS, INC., CAPITOL
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GEORGE BLOOD, and GEORGE BLOOD,
L.P.

Defendant(s).

Case No.: 3:23-cv-06522-MMC

**[Proposed] Order to Stay Case for Thirty
Days**

The Court, having considered the Parties' Stipulation to Stay the Case for Thirty Days, and good cause having been shown, hereby orders as follows:

1. The hearing on Plaintiffs' Motion noticed for April 11, 2025 is VACATED.
2. This case shall be stayed for thirty (30) days from the date of entry of this Order to allow the Parties to continue their settlement discussions.
3. If the settlement discussions result in a resolution, the Parties will promptly file an appropriate dismissal with the Court.
4. If the settlement discussions are not successful, the Parties shall meet and confer to propose a new schedule for the case and submit a joint proposed scheduling order to the Court within ten (10) days following the expiration of the stay.

IT IS SO ORDERED.

Dated: _____

MAXINE M. CHESNEY
United States District Judge