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15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN JOSE DIVISION

18 IN RE ANIMATION WORKERS ANTITRUST  
19 LITIGATION

Master Docket No. 14-CV-4062-LHK  
**CASE MANAGEMENT STATEMENT**

20  
21 THIS DOCUMENT RELATES TO:  
22 ALL ACTIONS  
23

Date: May 6, 2016  
Time: 1:30 p.m.  
Courtroom: 8, 4th Floor  
Judge: Hon. Lucy H. Koh

1 The parties submit this abbreviated joint statement for the Case Management Conference  
2 scheduled for May 6, 2016. This statement reports on events occurring in the litigation since the prior  
3 statement was submitted on March 16, 2016.

4 **A. Pending Motions**

5 On February 1, 2016, Plaintiffs filed their Notice of Motion and Motion for Class  
6 Certification and Memorandum of Law in Support and supporting documents. *See* ECF Nos. 203-10.  
7 Defendants filed their Opposition and supporting documents on March 24, 2016. *See* ECF Nos. 239-  
8 41. Plaintiffs filed their Reply and supporting documents on April 14, 2016. *See* ECF Nos. 261-65. A  
9 hearing on Plaintiffs' Motion is scheduled for May 6, 2016, the same day as the Case Management  
10 Conference. *See* ECF No. 266.

11 On March 31, 2016, Plaintiffs filed a Motion for Preliminary Approval of Settlement with  
12 Defendant Blue Sky Studios, Inc. and supporting documents. *See* ECF Nos. 249-51. A hearing is set  
13 for that motion on June 16, 2016.

14 **B. Discovery**

15 **1. Party Discovery**

16 The parties have engaged in routine discovery since the prior Case Management Statement,  
17 including serving updated written discovery responses and producing additional documents.

18 The parties are working cooperatively to schedule and take depositions. Following the filing  
19 of Plaintiffs' Motion for Class Certification, Defendants took the deposition of Plaintiffs' expert, Dr.  
20 Orley C. Ashenfelter, on March 15, 2016. Following the filing of Defendants' Opposition, Plaintiffs  
21 conducted the depositions of Disney declarant Melissa Fanfassian and Pixar declarant Elyse  
22 Klaidman on April 7, 2016. Plaintiffs also conducted the deposition of Defendants' expert, Dr.  
23 Michael C. Keeley, on April 8, 2016. Following the filing of Plaintiffs' Reply and their expert Dr.  
24 Ashenfelter's Reply Report, Defendants took an additional deposition of Dr. Ashenfelter on April 27,  
25 2016.

26 Plaintiffs and DreamWorks have agreed to the following schedule regarding DreamWorks'  
27 production of documents from three additional custodians:

28 May 9, 2016: Parties will agree on search terms.

1            May 20, 2016:            Substantial completion of production of non-privileged responsive  
2 documents resulting from review of 50% of all documents returned by agreed-upon searches,  
3 excluding Excel spreadsheets requiring substantial redactions of personal identifying  
4 information.

5            May 27, 2016:            Substantial completion of production of non-privileged responsive  
6 documents resulting from review of 100% of all documents returned by agreed-upon  
7 searches, excluding Excel spreadsheets requiring substantial redactions of personal  
8 identifying information.

9            June 10, 2016:            Completion of production of Excel spreadsheets requiring substantial  
10 redactions of personal identifying information.

11    **C.    Settlements**

12            Plaintiffs have reached a settlement with Defendants Sony Pictures Imageworks Inc. and  
13 Sony Pictures Animation Inc. and by early next week will file a motion for preliminary approval of  
14 this settlement. The Court has offered to schedule July 28, 2016 for the preliminary approval hearing.  
15 The parties respectfully suggest that this hearing be combined with the preliminary approval hearing  
16 for the settlement between Plaintiffs and Blue Sky Studios, Inc., currently scheduled for June 16,  
17 2016 at 1:30 p.m. The parties believe that combining the preliminary approval hearings will be more  
18 efficient for the parties and for the Court because the parties are proposing one Notice to be  
19 distributed to the class, which will cover both settlements, and one proposed Order preliminarily  
20 approving both settlements, with the same Plan of Allocation.

21    **D.    Scheduling**

22            The next event on the Court's pre-trial schedule in this case is the hearing on Plaintiffs'  
23 Motion for Class Certification, set for May 6, 2016.

24    **E.    Other Issues**

25            The parties have no other issues to report to the Court at this time.  
26  
27  
28

1 DATED: April 29, 2016

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**E-FILING ATTESTATION**

I, Jeff D. Friedman, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

s/ Jeff D. Friedman  
JEFF D. FRIEDMAN