

1 George A. Zelcs (*pro hac vice*)  
gzelcs@koreintillery.com  
2 Randall P. Ewing, Jr. (*pro hac vice*)  
rewing@koreintillery.com  
3 Ryan Z. Cortazar (*pro hac vice*)  
rcortazar@koreintillery.com  
4 **KOREIN TILLERY, LLC**  
205 North Michigan, Suite 1950  
5 Chicago, IL 60601  
Tel.: (312) 641-9750 / Fax: (312) 641-9751

Joshua Irwin Schiller, CA Bar #330653  
jischiller@bsflp.com  
**BOIES SCHILLER FLEXNER LLP**  
44 Montgomery St., 41st Floor  
San Francisco, CA 94104  
Tel.: (415) 293-6800 / Fax: (415) 293-6899

6 Stephen M. Tillery (*pro hac vice*)  
stillery@koreintillery.com  
7 Steven M. Berezney, CA Bar #329923  
sberezney@koreintillery.com  
8 Carol O’Keefe (*pro hac vice*)  
cokeefe@koreintillery.com  
9 **KOREIN TILLERY, LLC**  
505 North 7th Street, Suite 3600  
10 St. Louis, MO 63101  
Tel.: (314) 241-4844 / Fax: (314) 241-3525

Philip C. Korologos (*pro hac vice*)  
pkorologos@bsflp.com  
Joanna Wright (*pro hac vice*)  
jwright@bsflp.com  
Demetri Blaisdell (*pro hac vice forthcoming*)  
dblaisdell@bsflp.com  
**BOIES SCHILLER FLEXNER LLP**  
55 Hudson Yards, 20th Floor  
New York, NY 10001  
Tel.: (212) 446-2300 / Fax: (212) 446-2350

12 *Attorneys for Maria Schneider, Uniglobe Entertainment, LLC, and AST Publishing Ltd.*

13 **UNITED STATES DISTRICT COURT**

14 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

15 MARIA SCHNEIDER, individually and on  
16 behalf of all others similarly situated;

17 Plaintiff,

18 vs.

19 YOUTUBE, LLC and GOOGLE LLC;

20 Defendants.

21 YOUTUBE, LLC and GOOGLE LLC;

22 Counter-Plaintiffs,

23 v.

24 PIRATE MONITOR LTD.,

25 Counter-Defendant.  
26  
27  
28

**CASE NO. 3:20-cv-04423-JD**

**PLAINTIFF MARIA SCHNEIDER’S  
NOTICE OF MOTION AND MOTION  
FOR LEAVE TO FILE FIRST AMENDED  
COMPLAINT**

**Date:** August 12, 2021  
**Time:** 10:00 a.m.  
**Courtroom:** 11

**NOTICE OF MOTION AND MOTION**

1 PLEASE TAKE NOTICE that on August 12, 2021 at 10:00 a.m., or as soon thereafter as the  
2 matter can be heard by the above-titled court, in the courtroom of the Honorable James Donato  
3 located at the Phillip Burton Federal Building and United States Courthouse, Courtroom 11, 19th  
4 Floor, 450 Golden Gate Avenue, San Francisco, CA 94102, Plaintiff Maria Schneider will move the  
5 Court, pursuant to Federal Rule of Civil Procedure 15(a)(2), for an order granting her leave to file a  
6 first amended complaint in this matter adding as plaintiffs and putative class representatives  
7 Uniglobe Entertainment, LLC, and AST Publishing Ltd. The proposed first amended complaint is  
8 attached to the accompanying declaration of Randall P. Ewing, Jr., as Exhibit A, with a redlined  
9 copy of the proposed first amended complaint, which shows all non-formatting changes made  
10 therein, attached as Exhibit B. The motion will be based on this Notice and Motion, the  
11 Memorandum of Points and Authorities in Support of Motion for Leave to Amend, the Ewing  
12 declaration and accompanying exhibits, the complete records and files of this action, all other  
13 matters of which the Court may take judicial notice, and any other such evidence and oral argument  
14 as may be made at the hearing of this matter.  
15

16 Dated: July 2, 2021

Respectfully submitted,

17  
18 By: /s/ Randall P. Ewing, Jr.  
George A. Zeles (*pro hac vice*)  
19 Randall P. Ewing, Jr. (*pro hac vice*)  
Ryan Z. Cortazar (*pro hac vice*)  
20 KOREIN TILLERY, LLC  
205 North Michigan, Suite 1950  
21 Chicago, IL 60601  
22 Telephone: (312) 641-9750  
Facsimile: (312) 641-9751

23  
24 Stephen M. Tillery (*pro hac vice*)  
Steven M. Berezney, CA Bar #329923  
25 Carol O'Keefe (*pro hac vice*)  
KOREIN TILLERY, LLC  
26 505 North 7th Street, Suite 3600  
St. Louis, MO 63101  
27 Telephone: (314) 241-4844  
28 Facsimile: (314) 241-3525

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Joshua Irwin Schiller, CA Bar #330653  
BOIES SCHILLER FLEXNER LLP  
44 Montgomery St., 41st Floor  
San Francisco, CA 94104  
Telephone: (415) 293-6800  
Facsimile: (415) 293-6899

Philip C. Korologos (*pro hac vice*)  
Joanna Wright (*pro hac vice*)  
Demetri Blaisdell (*pro hac vice forthcoming*)  
BOIES SCHILLER FLEXNER LLP  
55 Hudson Yards, 20th Floor  
New York, NY 10001  
Telephone: (212) 446-2300  
Facsimile: (212) 446-2350

*Attorneys for Maria Schneider, Uniglobe  
Entertainment, LLC, and AST Publishing Ltd.*

1 **RELIEF REQUESTED**

2 Plaintiff Maria Schneider seeks leave to amend her complaint primarily to add as plaintiffs  
3 and putative class representatives Uniglobe Entertainment, LLC, and AST Publishing Ltd.

4 **ISSUE PRESENTED**

5 Whether this Court should grant Plaintiff Maria Schneider leave to amend her complaint  
6 primarily to add as plaintiffs and putative class representatives Uniglobe Entertainment, LLC,  
7 (“Uniglobe”) and AST Publishing Ltd. (“AST”), where no deadline to seek leave to amend has  
8 expired and there is no evidence of undue delay, bad faith, dilatory motive, or prejudice to  
9 Defendants that would result from the proposed amendment.

10 **MEMORANDUM OF POINTS AND AUTHORITIES**

11 **I. INTRODUCTION.**

12 Pursuant to Federal Rule of Civil Procedure 15(a), Plaintiff Maria Schneider respectfully  
13 submits this memorandum in support of her motion for leave to file her first amended class action  
14 complaint. *See* Exhibit A attached to the Declaration of Randall P. Ewing, Jr. (“Ewing Decl.”).<sup>1</sup>

15 **II. PROCEDURAL BACKGROUND.**

16 On July 2, 2020, Schneider and Pirate Monitor Ltd. filed a putative class action complaint  
17 against Defendants YouTube, LLC and Google LLC for copyright infringement and violations of  
18 the Copyright Act of 1976, 17 U.S.C. §§ 501 *et seq.* ECF No. 1.<sup>2</sup> Pirate Monitor later voluntarily  
19 dismissed its claims with prejudice. ECF No. 66. Schneider alleges that she is the legal or beneficial  
20 owner of exclusive rights under the copyrights to multiple works displayed on YouTube in violation  
21 of the Copyright Act, despite having previously notified Defendants that these works were being  
22 infringed. ECF No. 1 ¶¶ 60-76. The putative class members are likewise the legal or beneficial  
23

24 <sup>1</sup> For this Court’s and Defendants’ ease of reference, Schneider attaches a redlined copy of the  
25 proposed first amended complaint, which shows all non-formatting changes made therein. *See*  
Ewing Decl., Ex. B.

26 <sup>2</sup> Although the complaint originally named Alphabet Inc. as an additional defendant, ECF No. 1,  
27 Schneider voluntarily dismissed her claims against Alphabet on September 21, 2020, ECF No. 33.  
28 In addition to adding Uniglobe and AST as plaintiffs and removing Pirate Monitor Ltd., the proposed  
amended complaint removes Alphabet as a defendant to reflect its dismissal from this case.  
Defendants have consented to that amendment.

1 owners of exclusive rights under registered and recognized valid copyrights. *Id.* ¶ 99. These works,  
2 as well as millions of other works by Schneider and the putative Class, have been reproduced,  
3 distributed, displayed, and publicly performed on YouTube without Schneider’s and the putative  
4 Class members’ authorizations. *Id.* ¶ 102.

5 As alleged in the complaint, YouTube employs a two-tiered copyright enforcement system  
6 that protects the rights of large copyright holders but not those of smaller copyright owners. ECF  
7 No. 1 ¶¶ 52-59. Large creators, who have partnered with YouTube and Google, are provided access  
8 to Content ID, a digital fingerprint tool that compares videos uploaded to YouTube to a catalogue  
9 of copyrighted material provided by those large copyright owners. *Id.* ¶¶ 56-57. When an uploaded  
10 video matches a video protected by Content ID, YouTube blocks or permits the display of the  
11 infringing video based on the copyright owner’s preferences. *Id.* ¶ 56. Smaller copyright owners,  
12 including Schneider and the putative class, who are denied access to Content ID are relegated to a  
13 vastly inferior and time-consuming means of trying to police and manage their copyrights. This  
14 second enforcement system requires small copyright owners to locate the infringing material  
15 through manual searches and then file a takedown notice with YouTube. *Id.* ¶ 77. Defendants  
16 perpetuate this two-tiered enforcement system to increase their profits by maximizing user volume  
17 and thus advertising revenue. *Id.* ¶ 1.

18 Schneider now seeks to amend the class action complaint to remove Pirate Monitor Ltd. as  
19 a named plaintiff and putative class representative and add Uniglobe and AST as plaintiffs and  
20 putative class representatives. The proposed amendment also slightly amends some other existing  
21 allegations, but does not assert any new causes of action.

22 As detailed in the proposed amended complaint, Uniglobe and AST have had their  
23 copyrights repeatedly infringed by and on YouTube in precisely the same way as Schneider and the  
24 putative class. Uniglobe is the legal or beneficial owner of exclusive rights under the copyrights in  
25 the motion pictures *5 Weddings*, *Americanizing Shelley*, and *I a Minute*. Ewing Decl., Ex. A ¶ 66.  
26 Full videos of each of these films have been uploaded without authorization to YouTube and viewed  
27 by YouTube users. *Id.* ¶¶ 71-72. Despite Uniglobe’s submission of takedown notices regarding  
28 these motion pictures, infringing videos of these motion pictures continued to be uploaded to

1 YouTube. *Id.* ¶¶ 73-74. AST is one of the largest publishing houses in Russia and the legal and/or  
 2 beneficial owner of exclusive rights held under copyrights to numerous print and audio books either  
 3 in their entirety or with respect to certain translations, including *Selfmama: Life Hacks for a Working*  
 4 *Mother; Nutty Buddha; My Children; Children’s Book; The Life of Wonderful People and Animals:*  
 5 *Short Stories About All Sorts of Different Things; Pelagia and the Red Rooster; Zuleikha Opens Her*  
 6 *Eyes; History of the Russian State; and Spy Novel.* *Id.* ¶ 75. AST has submitted successful takedown  
 7 notices for works for which it is the legal and/or beneficial owner of exclusive rights held under  
 8 copyrights; despite these successful notices, videos infringing the works continue to be uploaded to  
 9 YouTube. *Id.* ¶ 77-78.

10 On May 24, 2021, Schneider provided a redlined copy of the proposed amendment and asked  
 11 for Defendants’ consent. Defendants requested time to consider the request, and Schneider agreed.  
 12 Mindful of the Court’s recent instruction to approach matters with “civility and cooperation,” ECF  
 13 No. 82, Schneider engaged in several meet and confer discussions with Defendants over the course  
 14 of the next month to attempt to obtain Defendants’ consent to the amended filing. But, on July 1,  
 15 2021, Defendants stated that they would not consent to the addition of Uniglobe and AST in an  
 16 amended complaint but would not “oppose the amendment to add further copyrighted works  
 17 asserted by Maria Schneider (assuming this would be a final identification) and other minor edits as  
 18 previously noted,” *e.g.*, the removal of Alphabet as a defendant. Plaintiff therefore brings this  
 19 motion seeking the Court’s leave to amend.

### 20 **III. LEGAL STANDARD.**

21 Under Federal Rule of Civil Procedure 15(a)(2), “leave to amend shall be freely given when  
 22 justice so requires.”<sup>3</sup> The Supreme Court has made clear that “this mandate is to be heeded,” absent  
 23 “any apparent or declared reason—such as undue delay, bad faith or dilatory motive on the part of  
 24

25 <sup>3</sup> Although there is some debate whether the amendment of a complaint to add a new plaintiff is  
 26 governed by Rule 15, which governs amendments, or Rule 21, which governs joinder of parties, *see*  
 27 6 Fed. Prac. & Proc. Civ. § 1479 (3d ed.), this Court evaluates the addition of plaintiffs under Rule  
 28 15, *see, e.g., In re Facebook Priv. Litig.*, No. 10-CV-02389-RMW, 2015 WL 2453734, at \*4 (N.D.  
 Cal. May 22, 2015). Identifying the precise rule governing the amendment is academic, however,  
 as “the same basic standard” applies regardless of the rule under which leave is sought. 6 Fed. Prac.  
 & Proc. Civ. § 1474.

1 the movant, repeated failure to cure deficiencies by amendments previously allowed, undue  
 2 prejudice to the opposing party by virtue of allowance of the amendment, [or] futility of  
 3 amendment.” *Foman v. Davis*, 371 U.S. 178, 182 (1962). The party opposing the amendment  
 4 carries the burden of showing why these factors require denial of leave to amend. *E.g.*, *DCD*  
 5 *Programs, Ltd. v. Leighton*, 833 F.2d 183, 187 (9th Cir. 1987); *Scognamillo v. Credit Suisse First*  
 6 *Bos., LLC*, 587 F. Supp. 2d 1149, 1150 (N.D. Cal. 2008). Among the *Foman* factors, prejudice is  
 7 the most important. *Howey v. United States*, 481 F.2d 1187, 1190 (9th Cir. 1973). “Absent prejudice,  
 8 or a strong showing of any of the remaining *Foman* factors, there exists a *presumption* under Rule  
 9 15(a) in favor of granting leave to amend.” *Eminence Capital, LLC v. Aspeon, Inc.*, 316 F.3d 1048,  
 10 1052 (9th Cir. 2003).

#### 11 **IV. ARGUMENT**

12 Leave to amend should be granted because Defendants cannot demonstrate prejudice or  
 13 make a strong showing of any of the remaining *Foman* factors.

##### 14 **A. Schneider’s Proposed Amendment Will Not Unfairly Prejudice Defendants.**

15 Defendants will not be unfairly prejudiced if Uniglobe and AST are added. While the  
 16 addition of new parties can result in undue prejudice if it requires Defendants to significantly alter  
 17 their trial strategy, or engage in new research and write new trial briefs, *see Morongo Band of*  
 18 *Mission Indians v. Rose*, 893 F.2d 1074, 1079 (9th Cir. 1990); *McGlinchy v. Shell Chem. Co.*, 845  
 19 F.2d 802, 809 (9th Cir. 1988), this case is still in the early stages of discovery, such that adding  
 20 Uniglobe and AST poses no risk of significantly affecting Defendants’ trial preparation.<sup>4</sup> The  
 21 addition of new plaintiffs after briefing on class certification has concluded can also give rise to the  
 22 sort of prejudice that warrants rejecting an amendment, *see Gonzalez v. Diamond Resorts Int’l*  
 23

---

24  
 25 <sup>4</sup> The parties are still engaged in rolling document production, and no depositions have been  
 26 noticed or taken. Defendants also served two sets of Requests for Production on Counterclaim  
 27 Defendant Gábor Csupó on May 20 and June 10 and issued a non-party document subpoena to a  
 28 company named Intellectual Property LLC on June 1. In fact, Defendants recently requested from  
 Plaintiff a 2-week extension until June 25, 2021 to respond to Plaintiff’s Second Requests for  
 Production of Documents, which Plaintiff granted. Thus, this is not a case where discovery is  
 nearing its end.

1 *Mktg., Inc.*, No. 218CV00979APGNJK, 2020 WL 4925702, at \*7 (D. Nev. Aug. 21, 2020), but  
2 briefing on class certification has not begun.

3 At most, the addition of Uniglobe and AST as named plaintiffs requires limited additional  
4 plaintiff-specific discovery, but such minor inconvenience does not result in unfair prejudice  
5 requiring denial of leave to amend when, as here, the new plaintiffs are “not seeking new categories  
6 or avenues of discovery,” *In re Facebook Priv. Litig.*, No. 10-CV-02389-RMW, 2015 WL 2453734,  
7 at \*5 (N.D. Cal. May 22, 2015), and each was already “a class member,” *see McConnell v. Red*  
8 *Robin Int’l, Inc.*, No. C 11-03026 WHA, 2012 WL 1357616, at \*2-\*3 (N.D. Cal. Apr. 17, 2012).  
9 Indeed, other than the limited, plaintiff-specific discovery necessary to prove their individual claims,  
10 Uniglobe’s and AST’s discovery will mirror Schneider’s discovery under the original complaint.

11 To the extent any proposed amendments do not relate solely to the newly named plaintiffs,  
12 those amendments do not assert new causes of action and do not expand the scope of discovery  
13 beyond that which was already relevant. And as the Ninth Circuit has often stated, a “party need  
14 not plead specific legal theories in the complaint, so long as the other side receives notice as to what  
15 is at issue in the case.” *Pac. Coast Fed. of Fishermen v. Glaser*, 937 F.3d 1191, 1200 (9th Cir. 2019)  
16 (quoting *Am. Timber & Trading Co. v. First Nat’l Bank of Oregon*, 690 F.2d 781, 786 (9th Cir.  
17 1982)). Because the original complaint provided YouTube adequate notice of all the issues in this  
18 case, and because the proposed amendments do not attempt to add to those issues, Defendants will  
19 not be unfairly prejudiced.<sup>5</sup>

20 Defendants’ arguments to the contrary are meritless. While Defendants claim that they “will  
21 have to start their searches from scratch” if Uniglobe and AST are added to this case, that is simply  
22 false. The overwhelming majority of the discovery Uniglobe and AST will seek will mirror what  
23 Schneider has already sought so far. Moreover, any supposed duplication of effort would be minor,  
24 at best, because Defendants have provided only limited discovery so far. In fact, the parties are still  
25

---

26  
27 <sup>5</sup> See also *Fresno Unified Sch. Dist. v. K.U. ex rel. A.D.U.*, 980 F. Supp. 2d 1160, 1178 (E.D. Cal.  
28 2013) (“When an amendment merely incorporates alternative theories using existing facts, it falls  
safely within Rule 15(a)’s policy of promoting litigation on the merits over procedural  
technicalities.”).



1 negotiating Schneider-specific search terms, and Defendants have not yet agreed to run searches for  
2 works in suit other than those identified in the original complaint. Now that Defendants have  
3 consented to Schneider's amendment to identify works in suit, they will be running additional  
4 Schneider-specific searches anyway. Because Defendants have yet to run searches using most of  
5 the Schneider-specific terms, the incremental burden of running Uniglobe- and AST-specific search  
6 terms is therefore minimal.<sup>6</sup> Moreover, if Uniglobe and AST are not permitted to join this lawsuit,  
7 they could just as easily file their own lawsuit, which would in turn permit discovery of the exact  
8 same information.

9 Defendants have also told Plaintiff that there is no justification for adding new named  
10 plaintiffs that are already members of the putative class, but that is incorrect. The fact that the new  
11 plaintiffs are already members of class actually weighs *in favor* of amendment. *See McConnell*,  
12 2012 WL 1357616, at \*2-3. Moreover, Defendants argue that Schneider's claims fail on their  
13 individual merits because she supposedly licensed YouTube or its users to use her works and  
14 because she supposedly had access to Content ID through her publishing agent. While Schneider  
15 disputes both of these contentions, the addition of new plaintiffs will ensure that Defendants'  
16 attempts to assert individual issues relating to Schneider's claims do not preclude certification of  
17 the putative class. And while Schneider believes she is an adequate class representative for the  
18 proposed class, the addition of named plaintiffs with copyrights in (i) motion picture works; (ii)  
19 books and audiobooks; and (iii) works first published outside the United States, will negate  
20 arguments Defendants might potentially raise in opposition to class certification about Schneider's  
21 adequacy as a class representative for the entire range of class members.

#### 22 **B. Schneider Did Not Unduly Delay Her Request To Amend.**

23 Defendants also cannot show undue delay in requesting this amendment. In evaluating this  
24 factor, the relevant inquiry is "whether the moving party knew or should have known the facts and  
25 theories raised by the amendment in the original pleading." *Jackson v. Bank of Hawaii*, 902 F.2d  
26 \_\_\_\_\_

27 <sup>6</sup> Plaintiffs have sent proposed search terms for proposed additional named plaintiffs Uniglobe  
28 and AST in an effort to minimize the burden on Defendants of making multiple collections or  
running further search terms after identifying a review population.

1 1385, 1388 (9th Cir. 1990). Here, Schneider did not know (or have any reason to know) of the  
2 infringements of Uniglobe's or AST's works when she filed her complaint, so this factor also does  
3 not weigh against leave to amend.

4 Defendants have told Plaintiff that the amendments are untimely because they were sought  
5 after May 14, 2021, but that is also incorrect. In early April, the parties were very close to agreeing  
6 to a schedule that included a deadline of May 14, 2021, to file motions to amend pleadings, but  
7 Defendants' insistence on raising ancillary issues in the guise of a scheduling dispute prevented the  
8 parties from finalizing an agreement. *See* ECF Nos. 72, 73. The schedule the parties were  
9 considering in early April is now untenable due to the slow pace of Defendants' production of  
10 documents to date, including the fact that Defendants have made just a single, small production  
11 since April. Defendants themselves have implicitly acknowledged this by proposing July 15, 2021,  
12 as a new deadline for motions for leave to amend.

13 In any event, the timing of the instant motion has not prejudiced Defendants, given their  
14 delays in considering the amendments themselves, their slowness in producing materials responsive  
15 to discovery requests, and their own request for an extension of time to provide responses and  
16 objections to Plaintiff's requests for production of documents during this same time period.  
17 Moreover, delay is not a sufficient ground for denying leave to amend, *DCD Programs, Ltd. v.*  
18 *Leighton*, 833 F.2d 183, 186 (9th Cir. 1987), particularly when, as explained above, that amendment  
19 causes no unfair prejudice to Defendants, *see, e.g., Kormylo v. Forever Resorts, LLC*, No. 13CV511  
20 JM WVG, 2015 WL 5944064, at \*6 (S.D. Cal. Oct. 13, 2015) (granting leave to file amended  
21 complaint containing new theory of liability where delay in filing caused defendants no prejudice).

### 22 **C. None Of The Other *Foman* Factors Support Denial Of Leave To Amend.**

23 Defendants cannot show that any of the other *Foman* factors weigh against granting  
24 Schneider leave to amend. Schneider's proposed amendment is clearly not futile: Uniglobe's and  
25 AST's new factual allegations, like Schneider's original allegations, plausibly allege that  
26 Defendants violated their copyrights as part of a course of conduct designed to increase YouTube's  
27 user volume and deny small copyright holders access to the copyright management tools necessary  
28 to effectively police their rights. Nor does Schneider seek this amendment in bad faith or for any

1 dilatory purpose. Finally, Schneider has not repeatedly failed to cure deficiencies in her  
2 complaint—indeed, Defendants have never moved to dismiss Schneider’s complaint. Thus, that  
3 factor also cannot weigh against granting leave to amend here.

4 **V. CONCLUSION**

5 For the reasons set forth above, Plaintiff Maria Schneider respectfully requests that the Court  
6 grant her leave to file the attached amended complaint.

7 Dated: July 2, 2021

Respectfully submitted,

8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

By: /s/ Randall P. Ewing, Jr.  
George A. Zelcs (*pro hac vice*)  
Randall P. Ewing, Jr. (*pro hac vice*)  
Ryan Z. Cortazar (*pro hac vice*)  
KOREIN TILLERY, LLC  
205 North Michigan, Suite 1950  
Chicago, IL 60601  
Telephone: (312) 641-9750  
Facsimile: (312) 641-9751

Stephen M. Tillery (*pro hac vice*)  
Steven M. Berezney, CA Bar #329923  
Carol O’Keefe (*pro hac vice*)  
KOREIN TILLERY, LLC  
505 North 7th Street, Suite 3600  
St. Louis, MO 63101  
Telephone: (314) 241-4844  
Facsimile: (314) 241-3525

Joshua Irwin Schiller, CA Bar #330653  
BOIES SCHILLER FLEXNER LLP  
44 Montgomery St., 41st Floor  
San Francisco, CA 94104  
Telephone: (415) 293-6800  
Facsimile: (415) 293-6899

Philip C. Korologos (*pro hac vice*)  
Joanna Wright (*pro hac vice*)  
Demetri Blaisdell (*pro hac vice forthcoming*)  
BOIES SCHILLER FLEXNER LLP  
55 Hudson Yards, 20th Floor  
New York, NY 10001  
Telephone: (212) 446-2300  
Facsimile: (212) 446-2350

*Attorneys for Maria Schneider, Uniglobe  
Entertainment, LLC, and AST Publishing Ltd.*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28