

1 Francis Malofiy, Esq.
Francis Alexander, LLC
2 280 N. Providence Road
3 Media, PA 19063
T: (215) 500-1000; F: (215) 500-1005
4 E: francis@francisalexander.com
5 *Attorney for Plaintiff*

6 Glen L. Kulik, Esq. (SBN 082170)
7 Kulik Gottesman & Siegel LLP
15303 Ventura Blvd., Suite 1400
8 Sherman Oaks, CA 91403
T: (310) 557-9200; F: (310) 557-0224
9 E: gkulik@kgslaw.com
10 *Attorney for Plaintiff*

11
12 **UNITED STATES DISTRICT COURT**
13 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

14 MICHAEL SKIDMORE, as Trustee for
the RANDY CRAIG WOLFE TRUST,

15
16 Plaintiff,

17 v.

18 LED ZEPPELIN; JAMES PATRICK
19 PAGE; ROBERT ANTHONY PLANT;
20 JOHN PAUL JONES; SUPER HYPE
21 PUBLISHING, INC.; WARNER MUSIC
22 GROUP CORP., Parent of
WARNER/CHAPPELL MUSIC, INC.;
23 ATLANTIC RECORDING
CORPORATION; RHINO
24 ENTERTAINMENT COMPANY,

25 Defendants.
26
27
28

Case No. 15-cv-03462 RGK (AGRx)

Hon. R. Gary Klausner

WITNESS LIST (COMBINED)
FILED BY PLAINTIFF MICHAEL
SKIDMORE, AS TRUSTEE FOR
THE RANDY CRAIG WOLFE
TRUST

Action Filed: May 31, 2014
Discovery Cut Off: February 11, 2016
Pre-trial Conf.: April 25, 2016
Trial Date: May 10, 2016

Pursuant to Rule 26(a)(3)(A) of the Federal Rules of Civil Procedure and Local Rules 16-2.4 and 16-5 of the Central District of California, Plaintiff Michael Skidmore, as Trustee for the Randy Craig Wolfe Trust, hereby submits the following list of witnesses who may be called to testify at trial in this matter.

The Witness List identifies the witnesses whom Plaintiff intend to call, or may call, at trial, exclusive of any witnesses who may be called for rebuttal or impeachment. Those witnesses whom Plaintiff may call only if the need arises are marked by an asterisk. Plaintiff expressly reserves the right to supplement this list at any time before trial, and the right to object to any supplemental witnesses identified by any other party. Plaintiff further reserves the right to call or refrain from calling any of the witnesses on this list.

A summary of each witnesses' expected testimony, and time estimates, are set forth below the list of witnesses.

Witness Name & Address	Brief Statement of Testimony	Time Estimate (Direct/Cross)
1 Michael Skidmore c/o Francis Malofiy, Esq. Francis Alexander, LLC 280 N. Providence Road Media, PA 19063 (215) 500-1000	PLAINTIFF – Facts in Plaintiff’s Complaint. Facts in Defendants’ Answers. The creation in or about 1966-67 of the musical composition <i>Taurus</i> and ownership of the copyright in that musical composition. Led Zeppelin’s access to <i>Taurus</i> . Led Zeppelin as the opening act for Spirit. Defendants’ admiration and familiarity with Spirit’s music, including the song <i>Taurus</i> . Access of the authors of the musical composition <i>Stairway to Heaven</i> to the musical composition <i>Taurus</i> . Substantial Similarity between <i>Taurus</i> and <i>Stairway to Heaven</i> . The technical audio creation, recordation, instrumentation, mixing, and mastering of <i>Taurus</i> . Lack of independent creation and development of <i>Stairway to Heaven</i> .	Direct: 2 hours Cross: _____

Witness Name & Address	Brief Statement of Testimony	Time Estimate (Direct/Cross)
	Communications and contact with Plaintiff, the band members of Spirit, Sprit, and/or his representatives. See Declaration.	
2 Mark Andes c/o Francis Malofiy, Esq. Francis Alexander, LLC 280 N. Providence Road Media, PA 19063 (215) 500-1000	FACT – Facts in Plaintiff’s Complaint. Facts in Defendants’ Answers. The creation in or about 1966-67 of the musical composition <i>Taurus</i> and ownership of the copyright in that musical composition. Led Zeppelin’s access to <i>Taurus</i> . Led Zeppelin as the opening act for Spirit. Defendants’ admiration and familiarity with Spirit’s music, including the song <i>Taurus</i> . Access of the authors of the musical composition <i>Stairway to Heaven</i> to the musical composition <i>Taurus</i> . Substantial Similarity between <i>Taurus</i> and <i>Stairway to Heaven</i> . The technical audio creation, recordation, instrumentation, mixing, and mastering of <i>Taurus</i> . Lack of independent creation and development of <i>Stairway to Heaven</i> . Communications and contact with Plaintiff, the band members of Spirit, Sprit, and/or his representatives. See Declaration.	Direct: 3 hours Cross: _____
3 Jay Ferguson 2865 Torito Road Santa Barbara, CA 93108 (805) 969-0235	FACT - Facts in Plaintiff’s Complaint. Facts in Defendants’ Answers. The creation in or about 1966-67 of the musical composition <i>Taurus</i> and ownership of the copyright in that musical composition. Led Zeppelin’s access to <i>Taurus</i> . Led Zeppelin as the opening act for Spirit. Defendants’ admiration and familiarity with Spirit’s music, including the song <i>Taurus</i> . Access of the authors of the musical composition <i>Stairway to Heaven</i> to the musical composition <i>Taurus</i> . Substantial Similarity between <i>Taurus</i> and <i>Stairway to Heaven</i> . The technical audio creation, recordation, instrumentation, mixing, and mastering of <i>Taurus</i> . Lack of independent creation and development of <i>Stairway to Heaven</i> . Communications and contact with Plaintiff, the band members of Spirit, Sprit, and/or his	Direct: 3 hours Cross: _____

Witness Name & Address	Brief Statement of Testimony	Time Estimate (Direct/Cross)
<p>4 Bruce Pates c/o Francis Malofiy, Esq. Francis Alexander, LLC 280 N. Providence Road Media, PA 19063 (215) 500-1000</p>	<p>representatives. See Declaration.</p> <p>FACT/EXPERT – Facts in Plaintiff’s Complaint. Facts in Defendants’ Answers. The creation in or about 1966-67 of the musical composition <i>Taurus</i> and ownership of the copyright in that musical composition. Led Zeppelin’s access to <i>Taurus</i>. Led Zeppelin as the opening act for Spirit. Defendants’ admiration and familiarity with Spirit’s music, including the song <i>Taurus</i>. Access of the authors of the musical composition <i>Stairway to Heaven</i> to the musical composition <i>Taurus</i>. Communications and contact with Plaintiff, the band members of Spirit, Sprit, and/or his representatives. See Declaration.</p>	<p>Direct: 2 hours Cross: _____</p>
<p>5 Tracy Longo Guitar Tech Corner 1822 E. Main Street Ventura, CA 93001 (805) 647-7221</p>	<p>FACT – Randy Wolfe’s guitar tech who has personal knowledge relating to Wolfe’s guitars and guitar set-up historically. Additionally, he has knowledge regarding Wolfe wanting to file suit and being in the process to file suit against Led Zeppelin for infringing his song <i>Taurus</i>. He also has knowledge of Wolfe’s interactions with Jimmy Page; Page asking Randy who to play <i>Taurus</i>, and Page interacting with Wolfe. See Declaration.</p>	<p>Direct: 45 min Cross: _____</p>
<p>6 Andrea (Wolfe) Baum c/o Glen Kulik, Esq. 5164 Paanau Road Koloa, Hawaii 96756</p>	<p>FACT – Knowledge regarding her brother Randy Wolfe. His guitar skills and ability at a young age, including playing with Jimmy Hendrix in NYC, starting the band Spirit. She also has knowledge regarding writing the song <i>Taurus</i>, for who it was written, when, and why. Success of Spirit and the first album <i>Taurus</i> being played live in concert in late 1960s and early 1970s. Additionally, information about the trust and formation. See Declaration.</p>	<p>Direct: 30 min Cross: _____</p>
<p>7 Janet Wolfe 2885 Pierpont Boulevard Ventura, CA 93001</p>	<p>FACT – Knowledge regarding her brother Randy Wolfe. His guitar skills and ability at a young age, including playing with Jimmy Hendrix in NYC, starting the band Spirit. She also has knowledge regarding writing the song <i>Taurus</i>, for who it was written, when, and why. Success of Spirit and the first album. <i>Taurus</i> being played live in</p>	<p>Direct: 30 min Cross: _____</p>

Witness Name & Address	Brief Statement of Testimony	Time Estimate (Direct/Cross)
	concert in late 1960s and early 1970s. Additionally, information about the Trust and formation. See Declaration.	
8 Marla (Wolfe) Randall 6120 Sutter Ave Ventura, CA 93003	FACT – Knowledge regarding her brother Randy Wolfe. His guitar skills and ability at a young age, including playing with Jimmy Hendrix in NYC, starting the band Spirit. She also has knowledge regarding writing the song Taurus, for who it was written, when, and why. Success of Spirit and the first album. Taurus being played live in concert in late 1960s and early 1970s. Additionally, information about the Trust and formation and operation.	Direct: 30 min Cross: _____
9 Linda Mensch, Esq. Bryan Cave, LLP 161 N. Clark Street Suite 4300 Chicago, IL 60601 (312) 602-5049	FACT (ATTORNEY) – Knowledge that Randy Wolfe actively sought her legal advice and had an in person meeting with her in the 1990’s to legally file suit against Led Zeppelin for infringing his song Taurus. Information related to why suit wasn’t brought at that time, including the legal landscape, statute of limitations, and finances. See Declaration.	Direct: 30 min Cross: _____
10 David Waterbury 12116 Hartsook Street Valley Village, CA 91607 (818) 505-8080	FACT – Knowledge regarding Randy Wolfe confronting Jimmy Page in the UK after an after concert party. Jimmy Pages comments to Wolfe in regards to the taking of Taurus. Wolfe being upset, financially broke, and unable to file suit. See Declaration.	Direct: 40 min Cross: _____
11 Larry Knight 7438 Shoshony Avenue Van Nuys, CA 91406 (818) 344-5515	FACT – Bass player for Spirit after the initial lineup. Knowledge regarding the concert at the Rainbow (UK) where there were 7 encores. After concert party where Jimmy Page and Randy Wolfe met and had discussion. Page complimenting Knight and the band Spirit on their performance and inquiring what they were doing. See Declaration.	Direct: 30 min Cross: _____
12 Paul Franklin 2235 Compote Circle Palmdale, CA 93551 (213) 800-3505	FACT – Knowledge regarding Randy Wolfe confronting Jimmy Page in the UK after an after concert party. Jimmy Pages comments to Wolfe in regards to the taking of Taurus. Wolfe being upset, financially broke, and unable to file suit. Additionally, Page admitting to lifting Taurus for Stairway to Heaven. See Declaration.	Direct: 30 min Cross: _____

	Witness Name & Address	Brief Statement of Testimony	Time Estimate (Direct/Cross)
13	Barry Hansen 6102 Pimenta Avenue Lakewood, CA 90712 (562) 480-9820	FACT – Knowledge of tapes of Taurus from 1966-68. Custody and control of tapes. Confirmation of emails providing these original tapes of Taurus to Michael Skidmore. Authenticity of tapes, when they were created, and how kept and eventually provided to Michael Skidmore. Confirmation Spirit playing Taurus live prior to contract. See Declaration.	Direct: 45 min Cross: _____
14	Michael R. Lee, Ph.D. 4134 S. Eudora Street Englewood, CO 80110 (303) 919-0579	FACT – Knowledge that Randy Wolfe actively sought her legal advice and had an in person meeting with her in the 1990’s to legally file suit against Led Zeppelin for infringing his song Taurus. Information related to why suit wasn’t brought at that time, including the legal landscape, statute of limitation, and financial reasons. See Declaration.	Direct: 30 min Cross: _____
15	Robert Lee, Esq. 4134 S. Eudora Street Englewood, CO 80110 (303) 919-0579	FACT (ATTORNEY) – Knowledge that Randy Wolfe actively sought her legal advice and had an in person meeting with her in the 1990’s to legally file suit against Led Zeppelin for infringing his song Taurus. Information related to why suit wasn’t brought at that time, including the legal landscape, statute of limitation, and financial reasons. See Declaration.	Direct: 30 min Cross: _____
16	Alexander Stewart, Ph.D. c/o Francis Malofiy, Esq. Francis Alexander, LLC 280 N. Providence Road Media, PA 19063 (215) 500-1000	EXPERT – This witness will testify on the subject matter of musicology, music transcription, substantial & strikingly similarity, and comparatively analyze <i>Taurus</i> and <i>Stairway to Heaven</i> . A written report prepared and signed by Dr. Stewart is was produced in discovery. Additionally a Declaration containing Rebuttal was submitted to the Court. The Report, Declaration, Audio Recordings and Transcription, and materials relied upon in coming to his opinion are incorporated by reference and are intended to be used at time of trial.	Direct: 4 hours Cross: _____
17	Erik Johnson c/o Francis Malofiy, Esq. Francis Alexander, LLC 280 N. Providence Road	EXPERT – Substantial similarity and striking similarity. This witness will testify as a Master Musician/Session Musician (Multi-Instrumentalist),	Direct: 2 hours Cross: _____

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

Witness Name & Address	Brief Statement of Testimony	Time Estimate (Direct/Cross)
Media, PA 19063 (215) 500-1000	Professor of Music, and musicologist who listened to, analyzed, transcribed, and performed on the faithful re-recordings of <i>Taurus</i> and <i>Stairway to Heaven</i> . It is expected that Mr. Johnson will perform at time of trial. A written report prepared and signed by Mr. Johnson is was produced in discovery. Additionally a Declaration containing Rebuttal was submitted to the Court. The Report, Declaration, Audio Recordings and Transcription, and materials relied upon in coming to his opinion are incorporated by reference and are intended to be used at time of trial.	
18 Brian Bricklin c/o Francis Malofiy, Esq. Francis Alexander, LLC 280 N. Providence Road Media, PA 19063 (215) 500-1000	EXPERT - Substantial similarity and striking similarity. This witness will testify on the subject matter of music production, audio engineering, songwriting and songwriting process, and band member. A written report prepared and signed by Brian Bricklin was produced in discovery along with a rebuttal report. Additionally a Declaration was submitted to the Court. The Report, Declaration, and Audio Recordings are incorporated by reference and are intended to be used at time of trial.	Direct: 2 hours Cross: _____
19 Kevin Hanson c/o Francis Malofiy, Esq. Francis Alexander, LLC 280 N. Providence Road Media, PA 19063 (215) 500-1000	EXPERT - Substantial similarity and striking similarity. This witness will testify as a Master Musician/Session Musician (Guitar) and Professor of Music who listened to, analyzed, and performed on the faithful re-recordings of <i>Taurus</i> and <i>Stairway to Heaven</i> . It is expected that Mr. Hanson will perform at time of trial. A written report prepared and signed by Kevin Hanson was produced in discovery. Additionally a Declaration containing Rebuttal was submitted to the Court. The Report, Declaration, Audio Recordings and Video Demonstration, and materials relied upon in coming to his opinion are incorporated by reference and are intended to be used at time of trial.	Direct: 2 hours Cross: _____

	Witness Name & Address	Brief Statement of Testimony	Time Estimate (Direct/Cross)
20	Michael Einhorn, Ph.D. c/o Francis Malofiy, Esq. Francis Alexander, LLC 280 N. Providence Road Media, PA 19063 (215) 500-1000	EXPERT - This witness will testify on the subject matter professional valuation of damages. A written report prepared and signed by Michael Einhorn has been produced and served in discovery. The Report and materials relied upon in coming to his opinion are intended to be used at time of trial.	Direct: 2 hours Cross: _____
21	Dennis Somach c/o Francis Malofiy, Esq. Francis Alexander, LLC 280 N. Providence Road Media, PA 19063 (215) 500-1000	EXPERT - This witness will testify on the subject matter of qualitative importance of Stairway to Heaven to Led Zeppelin, music history, and Led Zeppelin history. A written report prepared and signed by Denny Somach was prepared and discovery. Additionally, a Declaration containing Rebuttal was submitted to the Court. The Report, Declaration, and materials relied upon in coming to his opinion are intended to be used at time of trial.	Direct: 1.5 hours Cross: _____
22	Robert Coit, Esq. 770 County Square Drive Suite 200 Ventura, CA 93003 (805) 650-1197	FACT - Ventura , California, County Superior Court proceedings <i>re</i> Randy Craig Wolfe, including creation, termination and/or duration of Randy Craig Wolfe Trust and ownership and/or disposition of rights with respect to musical composition <i>Taurus</i>	Direct: 1 hour Cross: _____
23	Terry Lynn Moore 770 County Square Drive Suite 200 Ventura, CA 93003 (805) 650-1197	FACT - Ventura , California, County Superior Court proceedings <i>re</i> Randy Craig Wolfe, including creation, termination and/or duration of Randy Craig Wolfe Trust and ownership and/or disposition of rights with respect to musical composition <i>Taurus</i>	Direct: 20 min Cross: _____
24	Dave McKenna Address Unknown	FACT - Author of Article <i>re</i> : Randy Wolfe. Mr. McKenna interviewed Bernice Perle (Randy Wolfe's Mother) shortly before her death. The article was produced in discovery.	Direct: 30 min Cross: _____
DEFENDANTS' WITNESS LIST			
	Lou Adler Hollenbeck Music 3969 Villa Costera 1 Malibu, CA 90265	FACT - The 1967 creation and ownership, and performance and exploitation of, the musical composition <i>Taurus</i>	Direct: 2 hours Cross: 1 hour
25	Howard Frank, Esq. Hollenbeck Music 3969 Villa Costera 1 Malibu, CA 90265	FACT - The ownership of the musical composition <i>Taurus</i> , and Hollenbeck Music's knowledge of and inaction <i>re</i> <i>Stairway to Heaven</i>	Direct: 1 hour Cross: 30 min

	Witness Name & Address	Brief Statement of Testimony	Time Estimate (Direct/Cross)
26	**Mark Andes (Note: In both Plaintiff's and Defendants' Witness List)	FACT - The 1967 creation and ownership, and performance and exploitation of, the musical composition <i>Taurus</i> (as a surviving member of Spirit, his knowledge re performance is different than Adler's and Frank's)	Direct: 4 hours Cross: 4 hours
27	David Woerhaye or other PMK on behalf of Rhino Entertainment Co. and Atlantic Recording Corporation	DEFENDANT – PMK - Atlantic Recording Corporation's deductible expenses as to <i>Stairway to Heaven</i> ; the marketing and promotion of Led Zeppelin and the <i>Stairway to Heaven</i> recording and/or the products in which it appears, and the allocation of claimed profits between the allegedly infringing portion of <i>Stairway to Heaven</i> and noninfringing elements	Direct: 3 hours Cross: 1.5 hours
28	**Jay Ferguson (Note: In both Plaintiff's and Defendants' Witness List)	FACT - The 1967 creation and ownership, and performance and exploitation of, the musical composition <i>Taurus</i> (as a surviving member of Spirit, his knowledge re performance is different than Adler's and Frank's)	Direct: 4 hours Cross: 4 hours
29	Dr. Lawrence Ferrara	EXPERT - Lack of striking or substantial similarity between the works; prior art and common musical ideas and devices; quantitative importance of the allegedly similar portions	Direct: Not given Cross: 2 hours
30	John Paul Jones	DEFENDANT - Authorship of the composition <i>Stairway to Heaven</i> , including independently of <i>Taurus</i> ; prior art; lack of familiarity with <i>Taurus</i>	Direct: 4 hours Cross: 3 hours
31	James Patrick Page	DEFENDANT - Authorship of the composition <i>Stairway to Heaven</i> , including independently of <i>Taurus</i> ; session musician work and prior art; lack of familiarity with <i>Taurus</i> ; demonstrative evidence as to <i>Stairway to Heaven</i> and allegedly similar portions	Direct: 5 hours Cross: 3.75 hours
32	Robert Mathes	Lack of striking or substantial similarity between the works; prior art; qualitative importance of the allegedly similar portions; importance and appeal of <i>Stairway to Heaven</i> ; allocation of <i>Stairway to Heaven</i> profits to elements (for example, performance, other compositional elements, lyrics, recording) other than portions claimed to be similar to <i>Taurus</i>	Direct: 3 hours Cross: 2 hours
33	Robert Anthony Plant	Authorship of the composition <i>Stairway to Heaven</i> , including	Direct: 4 hours

Witness Name & Address	Brief Statement of Testimony	Time Estimate (Direct/Cross)
	independently of <i>Taurus</i> ; prior art; lack of familiarity with <i>Taurus</i>	Cross: 3 hours
34 William Ruhlmann (by deposition)	Randy Craig Wolfe's acquiescence in alleged copying from <i>Taurus</i>	Direct: 30 min Cross: 15 min
35 Michael Skidmore	Randy Craig Wolfe Trust and ownership and/or disposition of Randy Wolfe's rights, including with respect to musical composition <i>Taurus</i> ; knowledge of and action/inaction <i>re Stairway</i>	Direct: 4 hours Cross: 2 hours
36 Jeremy Blietz or other PMK on behalf of Warner/Chappell Music, Inc.	Warner/Chappell Music, Inc.'s deductible expenses as to <i>Stairway to Heaven</i> ; the allocation of claimed profits between the allegedly infringing portion of <i>Stairway to Heaven</i> and noninfringing elements	Direct: 3 hours Cross: 1.5 hours
37 DEFENDANTS MAY CALL IF THE NEED ARISES:	DEFENDANTS MAY CALL IF THE NEED ARISES:	DEFENDANTS MAY CALL IF THE NEED ARISES:
38 Joan Hudson or other PMK of Joan Hudson & Co.	The individual defendants' respective deductible expenses as to <i>Stairway to Heaven</i> ; the allocation of claimed profits between the allegedly infringing portion of <i>Stairway to Heaven</i> and non-infringing elements; *post-May 31, 2011 revenues	Direct: 3 hours Cross: 1.5 hours
39 *Scott McDowell or other PMK on behalf of Super Hype Publishing, Inc.	Super Hype Publishing, Inc.'s lack of exploitation of <i>Stairway to Heaven</i> in the three years preceding plaintiff's filing of this action	Direct: 1 hour Cross: 45 min
40 *Paul Robinson or other PMK on behalf of Warner Music Group Corp.	Warner Music Group Corp.'s lack of exploitation of <i>Stairway to Heaven</i> in the three years preceding plaintiff's filing of this action; to the extent any revenues from <i>Stairway to Heaven</i> are attributed to Warner Music Group, its deductible expenses and the allocation of claimed profits between the allegedly infringing portion of <i>Stairway to Heaven</i> and the non-infringing elements	Direct: 1 hour Cross: 45 min

1 Plaintiff also reserves the right to use deposition testimony in its case in chief.
2 Without limiting this right, Plaintiff identifies the following depositions:

3 **TESTIMONY BY VIDEO-DEPOSITION**

4 Plaintiff identifies the following witnesses whose video-deposition testimony
5 (or deposition testimony) may be used during Plaintiff's case in chief, during cross-
6 examination, or re-direct; or for other permissible uses, inclusive of but not limited
7 to: impeachment, rebuttal, or credibility.

- 8 1. James Patrick Page
- 9 2. John Paul Jones
- 10 3. Robert Plant
- 11 4. Jay Ferguson
- 12 5. Mark Andes

13 **TESTIMONY BY DEPOSITION**

14 Plaintiff identifies the following witnesses whose depositions may be used
15 during Plaintiff's case in chief, during cross-examination, or re-direct; or for other
16 permissible uses, inclusive of but not limited to: impeachment, rebuttal, or
17 credibility.

- 18 6. Bruce Pates
- 19 7. Michael Skidmore
- 20 8. William Ruhlmann
- 21 9. David Woirhaye
- 22 10. Jeremy Blietz

23
24 Both Plaintiff and Defendants reserve their rights to call witnesses identified
25 by the other party, to call witnesses not listed for impeachment purposes and to
26 amend or supplement this witness list as provided by law.

27 Plaintiff reserves the right to call in its case in chief (as if on cross)
28 Defendants or Defendants' Witnesses.

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

Respectfully submitted,
FRANCIS ALEXANDER, LLC
/s/ Francis Malofiy
Francis Malofiy, Esquire
Attorney ID No.: 208494
280 N. Providence Road
Media, PA 19063
T: (215) 500-1000
F: (215) 500-1005
E: francis@francisalexander.com
Law Firm / Lawyer for Plaintiff
/d/ April 4, 2016

Glen L. Kulik, Esquire
KULIK GOTTESMAN SIEGEL & WARE, LLP
15303 Ventura Boulevard | Suite 1400
Media, PA 19063
T: (310) 557-9200
F: (310) 557-0224
E: gkulik@kgswlaw.com
Attorneys for Plaintiff