

1 Jeffrey L. Kessler (*pro hac vice*)
jkessler@winston.com
2 David L. Greenspan (*pro hac vice*)
dgreenspan@winston.com
3 Sofia Arguello (*pro hac vice*)
sarguello@winston.com
4 **WINSTON & STRAWN LLP**
200 Park Avenue
5 New York, NY 10166-4193
Telephone: 212-294-6700
6 Facsimile: 212-294-4700

7 Diana Hughes Leiden (267606)
dhleiden@winston.com
8 Shawn R. Obi (288088)
sobi@winston.com
9 **WINSTON & STRAWN LLP**
333 S. Grand Avenue
10 Los Angeles, CA 90071
Tel: (213) 615-1700
11 Fax: (213) 615-1750

12 *Attorneys for Plaintiff and*
Counterclaim-Defendant
13 **WILLIAM MORRIS ENDEAVOR**
ENTERTAINMENT, LLC
14

15 **UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA**

17 **WILLIAM MORRIS ENDEAVOR**
ENTERTAINMENT, LLC,
18 **Plaintiff and Counterclaim-**
Defendant,
19 **v.**
20 **WRITERS GUILD OF AMERICA,**
WEST, INC. and WRITERS GUILD
21 **OF AMERICA, EAST, INC.,**
22 **Defendants and**
Counterclaimants,
23 **and MEREDITH STIEHM,**
24 **Counterclaimant.**
25

Case No. 2:19-cv-05465-AB-AFM
Hon. André Birotte Jr.

JOINT STIPULATION FOR
VOLUNTARY DISMISSAL
WITH PREJUDICE

Filed concurrently with [Proposed]
Order

Complaint Filed: June 24, 2019

1 Plaintiff and Counterclaim Defendant William Morris Endeavor
2 Entertainment, LLC (“WME”), on the one hand, and Defendants and
3 Counterclaimants Writers Guild of America, West, Inc. (“WGAW”) and Writers
4 Guild of America, East, Inc. (“WGAE”), and Counterclaimant Meredith Stiehm on
5 the other, acting through counsel, and pursuant to Federal Rule of Civil Procedure
6 41(a)(1)(A)(ii), hereby stipulate, in consideration of a negotiated settlement
7 executed by them, to the Dismissal With Prejudice of:

- 8 (1) All claims filed by WME against WGAW and WGAE;
- 9 (2) All counterclaims filed by WGAW and WGAE against WME;
- 10 (3) All counterclaims filed by Meredith Stiehm against WME.

11 Each party shall bear its own costs and fees, including all attorney’s fees.

12
13 DATED: February 5, 2021

WINSTON & STRAWN LLP

14 By: /s/ Jeffrey L. Kessler

15 Jeffrey L. Kessler (*pro hac vice*)
jkessler@winston.com
16 David L. Greenspan (*pro hac vice*)
dgreenspan@winston.com
17 Sofia Arguello (*pro hac vice*)
sarguello@winston.com
200 Park Avenue
18 New York, NY 10166-4193
Telephone: 212-294-6700
19 Facsimile: 212-294-4700

20 Diana Hughes Leiden (SBN 267606)
dhleiden@winston.com
21 Shawn R. Obi (SBN 288088)
sobi@winston.com
22 333 South Grand Avenue, 38th Floor
23 Los Angeles, CA 90071-1543
Telephone: 213-615-1700
24 Facsimile: 213-615-1750

25 *Attorneys for Plaintiff and Counterclaim*
26 *Defendant*
WILLIAM MORRIS ENDEAVOR
27 ENTERTAINMENT, LLC

DATED: February 5, 2021

ALTSHULER BERZON LLP

By: /s/ P. Casey Pitts

P. Casey Pitts (SBN 262463)
cpitts@altber.com
Stephen P. Berzon (SBN 46540)
sberzon@altber.com
Stacey Leyton (SBN 203827)
sleyton@altber.com
Andrew Kushner (SBN 316035)
akushner@altber.com
177 Post Street, Suite 300
San Francisco, California 94108
Telephone: (415) 421-7151
Facsimile: (415) 362-8064

ROTHNER, SEGALL & GREENSTONE

Anthony R. Segall (SBN 101340)
asegall@rsglabor.com
Juhyung Harold Lee (SBN 315738)
hlee@rsglabor.com
510 South Marengo Avenue
Pasadena, California 91101
Telephone: (626) 796-7555
Facsimile: (626) 577-0124

CONSTANTINE CANNON LLP

W. Stephen Cannon (*pro hac vice*)
scannon@constantinecannon.com
1001 Pennsylvania Ave, NW, Ste. 1300N
Washington, DC 20004
Telephone: (202) 204-3500
Facsimile: (202) 204-3501

Ethan E. Litwin (*pro hac vice*)
elitwin@constantinecannon.com
335 Madison Avenue, 9th Floor
New York, NY 10017
Telephone: (212) 350-2700
Facsimile: (212) 350-2701

*Attorneys for Defendants and
Counterclaimant*
WRITERS GUILD OF AMERICA, WEST,
INC. and WRITERS GUILD OF
AMERICA, EAST, INC., and MEREDITH
STIEHM

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

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

Ann M. Burdick (*pro hac vice*)
aburdick@wgaeast.org
Writers Guilds of America, East, Inc.
250 Hudson Street, Suite 700
New York, NY 10013
Telephone: (212) 767-7800
Facsimile: (212) 582-1909

*Attorney for Defendant and
Counterclaimant*
WRITERS GUILD OF AMERICA, EAST,
INC.

ATTESTATION

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

Pursuant to Local Rule 5-4.3.4(a)(2)(i), I, Jeffrey L. Kessler, attest that the other signatories listed, and on whose behalf this filing is submitted, concur in the filing content and have authorized this filing.

By: /s/ Jeffrey L. Kessler