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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
11 **FOR THE COUNTY OF LOS ANGELES**  
12 **CENTRAL CIVIL WEST**

13 ANITA DOOHAN, ET AL.,  
14 Plaintiffs,  
15 vs.  
16 THE IRV SCHECHTER COMPANY,  
17 Defendant.

**CASE NO. BC 268 876**

**STIPULATION AND ORDER**  
**GOVERNING PROVISION OF NOTICE**  
**OF PRELIMINARY APPROVAL OF**  
**SETTLEMENT TO SETTLEMENT**  
**CLASS MEMBERS**

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21 The parties to the above-captioned case, through their respective counsel of record, enter  
22 into the following stipulation:

23 1. On September 12, 2006, Judge Wendell Mortimer granted preliminary approval to  
24 the settlement of the case (the "Schechter Settlement") as set forth in a Consent Decree.

25 2. Judge Mortimer adopted the parties' suggestion that, to save on notice and  
26 administration costs of the proposed Schechter Settlement (which does not provide for payment  
27 of any money to plaintiffs, class members or Class Counsel), the preliminary approval should be  
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1 noticed and the Schechter Consent Decree Settlement administered in conjunction with other  
2 notices mailed in the TV Writers Cases.

3 3. The Consent Decree does not specify the form of notice to be used to notify  
4 Settlement Class members of the proposed Schechter Settlement. Pursuant to the Court's  
5 direction on December 21, 2009, the parties have negotiated the notice attached as Exhibit A.

6 4. The Consent Decree also does not specify how the Settlement Class members will  
7 be identified and how the notice will be sent to them. Pursuant to the terms of the Other  
8 Settlements, the WGA West and East are providing the names and addresses of persons who are  
9 Settlement Class members in this case to the Claims Administrator in the Other Settlements,  
10 Garden City Group, Inc. Garden City will run the addresses through two update services to  
11 obtain the most current addresses possible. The parties agree that Garden City Group, Inc. shall  
12 mail the Notice of the Schechter Settlement to all Settlement Class members using Standard A  
13 mail, postage prepaid, to be paid by Class Counsel.

14 5. The parties also agree that the Notice concerning the Schechter Settlement shall be  
15 published on a website to be maintained by Class Counsel, [www.writerscase.com](http://www.writerscase.com). The address of  
16 that website is contained in the Notice. A second website also to be maintained by Class Counsel,  
17 [www.TVWritersCounsel.com](http://www.TVWritersCounsel.com), shall contain less detailed information about the Schechter  
18 Settlement. Each website will contain links to the other so that it will be easy for Settlement  
19 Class members to navigate between the two websites.

20 6. The Consent Decree also does not specify deadlines or procedures for opting out  
21 of or commenting on the Schechter Settlement. The parties agree to the following dates and  
22 deadlines.

23 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to Court  
24 approval, that:

25 1. Plaintiffs, through Class Counsel, shall cause Garden City Group, Inc. to send the  
26 Mailed Notice via Standard A mail, postage prepaid, to all Settlement Class members as  
27 identified pursuant to the process set forth in paragraph 4 above, within 14 days of the date of this  
28 Order. The Irv Schechter Company and its principal, Irv Schechter (together "Schechter"), shall

1 have no obligations under this paragraph or to pay for the costs of mailing.

2 2. Plaintiffs, through Class Counsel, shall publish the Notice on  
3 [www.writerscase.com](http://www.writerscase.com), and [www.TVWritersCounsel.com](http://www.TVWritersCounsel.com), to remain available at least through the  
4 Effective Date of the Schechter Settlement. The website [www.TVWritersCounsel.com](http://www.TVWritersCounsel.com) shall  
5 contain summary information about the Schechter Settlement, and each website will be linked to  
6 the other. Schechter shall have no obligations under this paragraph or to pay for the cost of  
7 creating or maintaining the website.

8 3. The final fairness hearing shall commence at 11:00 AM. on September 17, 2010.  
9 The parties shall enter that date and time in the appropriate places in the Notice.

10 4. The opt out process shall be as follows:

11 To validly request exclusion, a Settlement Class member must submit a written  
12 and signed statement to Lead Class Counsel and Schechter's Counsel post-marked by 45 days  
13 from mailing of the Notice. The request for exclusion must include the Person's name, postal and  
14 email addresses and telephone number and state his, her, or its intention to be excluded from the  
15 settlement. At least five business days before the final approval hearing, Lead Class Counsel  
16 shall file a report with the Court including the following information: (i) the number and names  
17 of any valid requests for exclusion; and (ii) the disposition of any requests for exclusion that were  
18 withdrawn or invalidated, and the reason for designating them invalid.

19 5. The comment and objection process shall be as follows:

20 Settlement Class members who wish to object to the Schechter Settlement or any  
21 part of it may be heard at the final approval hearing only if:

22 a. They submit to Lead Class Counsel and Schechter's Counsel a concise  
23 written statement of their objections with a statement of their intention to appear at  
24 the hearing or otherwise communicate their intention to appear at the hearing in  
25 writing;

26 b. Such statement of objections/statement of intention is postmarked at least  
27 twenty-one (21) days prior to the date set for the final approval hearing;

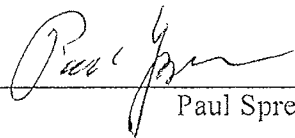
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c. Such statement identifies counsel, if any, who represents the objector and whether such counsel will appear at the final approval hearing; and Settlement Class members who have timely and properly requested exclusion from the Schechter Settlement shall not have standing to object to that Settlement at the final approval hearing.

DATED: June 3, 2010

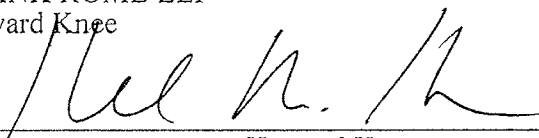
PAUL SPRENGER AND JANE LANG, ATTORNEYS  
Paul Sprenger

By:   
Paul Sprenger

For all Plaintiffs Counsel

DATED: June 4, 2010

BLANK ROME LLP  
Howard Knee

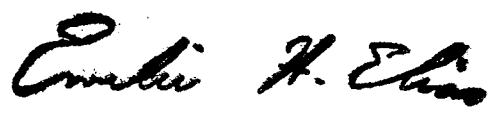
By:   
Howard Knee

Attorneys for Defendant

**ORDER**

Pursuant to the foregoing stipulation of the parties, it is so ordered.

DATED: June 7, 2010



Hon. Emilie H. Elias  
Judge of the Los Angeles Superior Court