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7 ENTRAVISION COMMUNICATIONS
8 CORPORATION

8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

11 GLOBAL MUSIC RIGHTS, LLC,
12
13 Plaintiff,

14 v.

15 ENTRAVISION
16 COMMUNICATIONS
17 CORPORATION,
18 Defendant.

Case No. 2:19-cv-08535-TJH (ASx)

**DEFENDANT AND
COUNTERCLAIMANT
ENTRAVISION
COMMUNICATIONS
CORPORATION'S REPLY TO
GMR'S OPPOSITION TO MOTION
TO STAY**

Date: March 2, 2020
Time: Taken Under Submission
Judge: Hon. Terry J. Hatter, Jr.

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I. INTRODUCTION

The logic of a modest stay of this action is unassailable: there is a prior related case—the *RMLC* Action—in which the complex antitrust claims raised in this action are already being litigated, discovery is active and ongoing, and the Court has set a discovery cutoff date and pretrial conference. By contrast, in this action, discovery has not yet begun, and the Court has not even scheduled the Rule 26 conference.

Once the Court has resolved the antitrust claims in the *RMLC* Action, this lawsuit literally may be over because a finding that GMR has violated the antitrust laws in the *RMLC* Action would necessarily carry over to this action and bar GMR’s affirmative claims. Likewise, Entravision has agreed that a finding in favor of GMR on the facts presented in *RMLC*’s antitrust claims would bind Entravision in this action. What is the logic of forcing Entravision—one of thousands of members of *RMLC*—to actively litigate its antitrust claims in this action while the *RMLC* Action is heading towards a resolution? GMR never explains, beyond the implied fact that GMR wants Entravision to have to spend a lot of money on legal fees to put pressure on Entravision to settle.

GMR will not suffer any prejudice if a stay of the case is issued, whereas Entravision would be prejudiced if a stay is not issued. For all these reasons, Entravision urges the Court to grant this motion.

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