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 BRIAN WARNER and MARILYN
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 10 UNITED STATES DISTRICT COURT
 11 CENTRAL DISTRICT OF CALIFORNIA
 12 WESTERN DIVISION

13 ESMÉ BIANCO,
 14 Plaintiff,
 15 vs.

16 BRIAN WARNER a/k/a MARILYN
 17 MANSON, individually; MARILYN
 18 MANSON RECORDS, INC.,
 19 Defendants.

CASE NO. 2:21-CV-3677-FLA-MAR

**DEFENDANTS' NOTICE OF
 MOTION AND MOTION TO STAY
 PROCEEDINGS PURSUANT TO 18
 U.S.C. § 1595(b)**

*Memorandum of Points and Authorities,
 Declarations of Howard E. King and
 Blair Berk, and Proposed Order filed
 concurrently*

Date: January 13, 2023
 Time: 1:30 p.m.
 Crtrm.: 6B

The Hon. Fernando L. Aenlle-Rocha

SAC Filed: May 12, 2022
 Trial Date: June 20, 2023

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE THAT on January 13, 2023, at 1:30 p.m., or as
3 soon thereafter as this matter may be heard in the United States District Court for
4 the Central District of California, 350 W. First Street, Courtroom 6B, Los Angeles,
5 CA 90012, the Honorable Fernando L. Aenlle-Rocha presiding, Defendants Brian
6 Warner and Marilyn Manson Records, Inc. (“Defendants”) will and hereby do move
7 the Court for an order staying proceedings pursuant to 18 U.S.C. § 1595(b).

8 This motion is based on this Notice of Motion and Motion, the accompanying
9 Memorandum of Points and Authorities, the Declarations of Howard E. King and
10 Blair Berk filed concurrently, all other papers and pleadings on file, argument of
11 counsel at any hearing of this motion, and any other evidence or arguments that the
12 Court may consider.

13 Defendants file this motion following a conference of counsel pursuant to
14 Local Rule 7-3, which took place on December 8, 2022. The parties discussed
15 Defendants’ intended motion and were unable to obviate the need for this motion.

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17 DATED: December 15, 2022 KING, HOLMES, PATERNO &
18 SORIANO, LLP

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20 By: /s/ Howard E. King
21 HOWARD E. KING
22 Attorneys for Defendants BRIAN WARNER
23 and MARILYN MANSON RECORDS, INC.
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