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8 *(Additional counsel listed on*
second page)

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10 UNITED STATES DISTRICT COURT
 11 CENTRAL DISTRICT OF CALIFORNIA

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13 GEORGE CLINTON, an individual,) Case No. CV 10-9476 ODW (PLAx)
 14 Plaintiff,)
 15 v.) Honorable Otis D. Wright II, Ctrm 11

16 WILL ADAMS, p/k/a will.i.am,) **NOTICE OF SETTLEMENT AND**
 individually and d/b/a WILL.IAM MUSIC) **STIPULATION TO VACATE**
 17 PUBLISHING, an individual; ALLAN) **ORDER TO SHOW CAUSE,**
 PINEDA, p/k/a apl.de.ap, individually and) **FINAL PRE-TRIAL**
 18 d/b/a JEEPNEY MUSIC PUBLISHING,) **CONFERENCE AND TRIAL**
 an individual; JAIME GÓMEZ, p/k/a) **DATES**

19 Taboo, individually and d/b/a NAWASHA)
 NETWORKS PUBLISHING, an) *[Proposed Order Lodged*
 20 individual; STACY FERGUSON, p/k/a) *Concurrently Herewith]*
 Fergie, an individual; GEORGE PAJON,
 21 JR., an individual; JOHN CURTIS, an)

individual; UNIVERSAL MUSIC) Trial:
 22 GROUP, INC., a Delaware corporation;) Date: June 5, 2012
 UMG RECORDINGS, INC., a Delaware) Time: 9:00 a.m.
 23 corporation; WILL I AM MUSIC, INC., a) Place: Courtroom 11

California corporation; CHERRY LANE) Final Pre-Trial Conference:
 24 MUSIC PUBLISHING COMPANY, INC.,) Date: May 22, 2012
 a New York corporation; EL CUBANO) Time: 10:00 a.m.
 25 MUSIC, INC., a California corporation;) Place: Courtroom 11
 EMI BLACKWOOD MUSIC INC., a)

26 Connecticut corporation; TAB)
 MAGNETIC, INC., a California)
 27 corporation; and DOES 1 through 10,)

28 Defendants.)

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13 Attorneys for Defendant
UMG Recordings, Inc.
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1 TO THE HONORABLE COURT, ALL INTERESTED PARTIES, AND THEIR
2 ATTORNEYS OF RECORD:

3 Plaintiff George Clinton (“Plaintiff”) and Defendants William Adams, Allan
4 Pineda, Jaime Gomez, Stacy Ferguson, will.i.am music, inc., Tab Magnetic, Inc., and
5 UMG Recordings, Inc. (also erroneously sued as “Universal Music Group, Inc.”)
6 (“Defendants,” and together with Plaintiff, the “Parties”), by and through their
7 respective attorneys of record, stipulate as follows:

8 WHEREAS, on April 27, 2012, the Parties participated in a full-day of
9 mediation through the Court’s Alternative Dispute Resolution Program;

10 WHEREAS, following the April 27 mediation, the Parties continued their
11 settlement negotiations with the assistance of the Court’s ADR Program Director;

12 WHEREAS, the Parties have now reached a settlement in principle to resolve
13 this entire action, and have executed a Memorandum of Understanding and Settlement
14 to that effect;

15 WHEREAS, the Parties need additional time to finalize and memorialize a long-
16 form version of the settlement agreement;

17 WHEREAS, the Plaintiff needs additional time to prepare a motion or
18 application for Court-approval of the settlement, or to obtain consent to the settlement
19 from Plaintiff’s lien-holders;

20 WHEREAS, the Court issued an order to show cause no later than May 21, 2012
21 why Defendant will.i.am music, inc., should not have default judgment entered against
22 it; and

23 WHEREAS, a Final Pre-Trial Conference is presently scheduled for May 22,
24 2012, at 10:00 a.m., and a trial is presently scheduled for June 5, 2012, at 9:00 a.m.;

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1 IT IS HEREBY STIPULATED, by and between the Parties through their
2 respective undersigned counsel, subject to approval by the Court, that:

- 3 1. The Court's order to show cause no later than May 21, 2012 why
4 Defendant will.i.am music, inc. should not have default judgment entered
5 against it is vacated;
- 6 2. The Final Pre-Trial Conference presently scheduled for May 22, 2012 is
7 vacated;
- 8 3. The trial date presently scheduled for June 5, 2012 is vacated; and
- 9 4. Within 21 days of the date of entry of an order approving this stipulation,
10 the Parties shall submit a Joint Status Report regarding the status of their
11 efforts to memorialize a long-form agreement, and the status of Plaintiff's
12 efforts to obtain approval of the settlement from the Court or Plaintiff's
13 lien-holders.

14 IT SO STIPULATED, THROUGH COUNSEL OF RECORD.

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16 Dated: May 14, 2012

GRODSKY & OLECKI LLP
Allen B. Grodsky
John Metzidis

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18 By: /s/ Allen B. Grodsky
19 Allen B. Grodsky

20 Attorneys for Defendants
21 Adams, Pineda, Gomez, Ferguson, will.i.am
22 music, inc., and Tab Magnetic, Inc.

23 Dated: May 14, 2012

DOBRUSIN THENNISCH, PC
Jeffrey P. Thennisch

24
25 By: /s/ Jeffrey P. Thennisch (w/ permission)
26 Jeffrey P. Thennisch

27 Attorneys for Plaintiff George Clinton
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Dated: May 14, 2012

CALDWELL, LESLIE & PROCTOR PC
Linda M. Burrow
Alison Mackenzie

By: /s/ Linda M. Burrow (w/ permission)
Linda M. Burrow

Attorneys for Defendant UMG Recordings,
Inc., both a named defendant and erroneously
sued as “Universal Music Group, Inc.”