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FILED  
 CLERK, U.S. DISTRICT COURT  
 JUN 15 2012  
 CENTRAL DISTRICT OF CALIFORNIA  
 DEPUTY  
 BY *407*

Attorney for Plaintiff George Clinton

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JUN 15 2012

UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA

CLERK, U.S. DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA  
 BY *407* 10 DEPUTY

GEORGE CLINTON, an individual,

Plaintiff,

v.

WILL ADAMS, p/k/a will.i.am,  
 Individually, et al.,

Defendants.

Case No. CV 10-09476 ODW (PLAx)

**GEORGE CLINTON'S EX PARTE  
 APPLICATION TO FILE MOTION AND  
 [PROPOSED] ORDER CONTAINING  
 CLINTON'S FINANCIAL AND  
 ATTORNEY WORK PRODUCT  
 MATERIALS UNDER SEAL PURSUANT  
 TO LOCAL RULE 79-5.1**

As a follow-up to the Court's granting of the Joint Ex Parte Application To Approve The Settlement Agreement previously reached by the parties themselves on June 7, 2012, and in recognition of the multiple liens filed in this action at ECF Nos. 9 and 43, Plaintiff George Clinton ("Clinton") respectfully requests leave to file a Motion for Division and Distribution of Settlement Funds as well as a Proposed Order granting such Motion, both agreed to by the named parties under seal pursuant to Local Rule 79-5.1. *See also* Clinton's Notice of Manual Filing, ECF No. 122.

Through this Ex Parte Application, Clinton states that both the substance of the Motion, the accompanying exhibits, as well as the Proposed Order granting such Motion (the "Clinton Materials"), contain sensitive and confidential, attorney client, and/or work product materials

1 which are requested to be placed under seal pursuant to Local Rule 79-5.1. Most notably, the  
2 very nature of the Motion at bar to disseminate the pool of settlement funds generated by this  
3 action requires the Motion to disclose the amount of such funds that shall be payable to Clinton.  
4 This is a key provision which the parties, especially the named Defendants, required to keep and  
5 remain confidential as part of the voluntary resolution reached by the named parties themselves  
6 with the assistance of the Court's Mediation Office.  
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8           Although Clinton respectfully recognizes that the named lienholders in this action at ECF  
9 Nos. 9 and 43 each legitimately need to review these materials in order to respond to the relief  
10 requested in the Motion, it is submitted that the nature of the materials and the request will  
11 require the disclosure, discussion, and potential disposition of information and materials of a  
12 highly-sensitive financial nature (*i.e.*, the settlement amount itself) as well as the dissemination  
13 of such funds and other future legal enforcement efforts to be undertaken by Clinton.  
14

15           Clinton applies to file the Clinton Materials under seal because they contain sensitive  
16 financial information relating to the confidential settlement amount reached by both Clinton and  
17 the named Defendants as well as information and documents that are subject to the attorney-  
18 client privilege and the work product doctrine. By virtue of the fact that the Clinton Materials  
19 contain information and documents that are subject to such pre-existing confidential obligations,  
20 it is respectfully submitted that the Clinton Materials must be submitted under seal to protect the  
21 Defendants and to ensure that such documents and information from view of the public.  
22 However, it is equally recognized that this matter needs to be balanced with the lienholder's  
23 legitimate rights to respond to this Motion.  
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26           Accordingly, Clinton hereby respectfully applies, pursuant to Local Rule 79-5.1, to file  
27 the Clinton Materials under seal which will allow the lienholders to raise their legal claims to the  
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Court while still preserving the confidentiality of the Clinton Materials. A proposed order is filed concurrently herewith for the Court's consideration.

Dated: June 14, 2012

Respectfully submitted,

GEORGE CLINTON

By: /s/ Jeffrey P. Thennisch  
One of his Attorneys

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