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10 Attorneys for Defendants WILL ADAMS (sued as WILL ADAMS,
p/k/a will.i.am, individually and d/b/a WILL.I AM MUSIC PUBLISHING);
11 ALLAN PINEDA (sued as ALLAN PINEDA, p/k/a apl.de.ap, individually
and d/b/a JEEPNEY MUSIC PUBLISHING, an individual); JAIME GOMEZ
12 (sued as JAIME GOMEZ, p/k/a Taboo, individually and d/b/a NAWASHA
NETWORKS PUBLISHING, an individual); STACY FERGUSON (sued as
13 STACY FERGUSON, p/k/a Fergie); WILL.I.AM MUSIC, INC.; CHERRY
LANE MUSIC PUBLISHING COMPANY, INC.; TAB MAGNETIC, INC.;
14 GEORGE PAJON, JR.; EMI BLACKWOOD MUSIC, INC.

15 **UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA**

17 GEORGE CLINTON, an individual,
18
19 Plaintiff,
20 v.

Case No. CV10-9476 ODW (PLAx)
Hon. Otis D. Wright, II
Courtroom 11

21 WILL ADAMS, p/k/a will.i.am,
individually and d/b/a WILL.I AM
22 MUSIC PUBLISHING; ALLAN
PINEDA, p/k/a apl.de.ap, individually
23 and d/b/a JEEPNEY MUSIC
PUBLISHING, an individual; JAIME
24 GOMEZ, p/k/a Taboo, individually and
d/b/a NAWASHA NETWORKS
25 PUBLISHING, an individual; STACY
FERGUSON, p/k/a Fergie, an individual;
26 GEORGE PAJON, JR., an individual;
JOHN CURTIS, an individual;
27 UNIVERSAL MUSIC GROUP, INC., a
Delaware corporation; UMG
28 RECORDINGS, INC., a Delaware

**STIPULATION TO EXTEND
DEFENDANTS' DEADLINE FOR
FILING A RESPONSE TO
PLAINTIFF'S COMPLAINT BY
SIXTY DAYS PURSUANT TO
LOCAL RULES 7-1 AND 8-3**

Complaint Filed: December 10, 2010
Trial Date: Not Assigned

1 corporation; and WILL I AM MUSIC,
2 INC., a California corporation; CHERRY
3 LANE MUSIC PUBLISHING
4 COMPANY, INC., a New York
5 corporation; EL CUBANO MUSIC,
6 INC., a California corporation; EMI
7 BLACKWOOD MUSIC, INC., a
8 Connecticut corporation; TAB
9 MAGNETIC, INC., a California
10 corporation; and DOES 1 through 10,

11
12 Defendants.

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14 Plaintiff GEORGE CLINTON (“Plaintiff”) and Defendants GEORGE
15 PAJON, JR. and EMI BLACKWOOD MUSIC, INC. (“Defendants”) enter into the
16 following stipulation pursuant to Local Rules 7-1 and 8-3 of the United States
17 District Court for the Central District of California:

18 WHEREAS Plaintiff filed the Complaint in Case No. CV10-9476-ODW-
19 PLAx (the “Complaint”) on or about December 10, 2010;

20 WHEREAS Plaintiff has served the Complaint on one or more of the
21 Defendants;

22 WHEREAS Plaintiff and Defendants (the “Parties”) have agreed that a
23 consolidated and coordinated response date for all named defendants in this action
24 will allow for more orderly litigation, and permit the Parties to engage in early,
25 information settlement talks;

26 WHEREAS counsel for the Defendants listed herein have agreed to accept
27 service on behalf of those Defendants in exchange for an extension of time in which
28 to respond to the Complaint;

1 NOW THEREFORE, IT IS HEREBY STIPULATED that the deadline for
2 Defendants to file a response to Plaintiff's Complaint shall be extended to March 4,
3 2011.
4

5 Dated: January 10, 2011

BRYAN CAVE LLP
Jonathan S. Pink
Kara E. F. Cenar
Mariangela M. Seale

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7
8 By: /s/ Jonathan S. Pink

9 Jonathan S. Pink
10 Attorneys for Defendants
11 WILL ADAMS; ALLAN PINEDA; JAIME
12 GOMEZ; STACY FERGUSON;
13 WILLIAM MUSIC, INC.; CHERRY
14 LANE MUSIC PUBLISHING COMPANY,
15 INC.; TAB MAGNETIC, INC.; GEORGE
16 PAJON, JR.; EMI BLACKWOOD MUSIC,
17 INC.

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27
28 Dated: January 10, 2011

ALLAN LAW GROUP, P.C.
Robert J. Allan
Rod Rummelsburg

By: /s/ Robert J. Allan

Robert J. Allan
Attorneys for Plaintiff
GEORGE CLINTON