

DAVIS WRIGHT TREMAINE LLP  
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Mary H. Haas (State Bar No. 149770)  
maryhaas@dwt.com

Attorneys for Lienholder  
HENDRICKS & LEWIS PLLC

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

GEORGE CLINTON, an individual,  
  
Plaintiff,  
  
vs.  
  
WILL ADAMS, p/k/a will.i.am, *et al.*,  
  
Defendants.

Case No. CV10-09476-ODW (PLAx)

The Honorable Otis D. Wright, II

**DECLARATION OF O. YALE LEWIS,  
JR. IN SUPPORT OF RESPONSE OF  
JUDGMENT LIENHOLDER  
HENDRICKS & LEWIS TO MOTION  
FOR DISTRIBUTION AND DIVISION  
OF SETTLEMENT FUNDS AND  
REQUEST FOR ALTERNATE  
DISTRIBUTION**

Hearing Date: July 16, 2012

Action Filed: December 10, 2010

I, O. Yale Lewis, Jr., declare and state as follows:

1. I am an attorney admitted to practice before all the courts of the State of Washington. I am a partner of the firm Hendricks & Lewis PLLC, judgment

lienholder in this action (“H&L” or “Judgment Lienholder”). This declaration is based upon personal knowledge, except those matters stated upon information and belief, which matters I believe to be true.

2. Hendricks & Lewis has a judgment against George Clinton entered by the United States District Court for the Western District of Washington on May 28, 2010 in the amount of \$1,675,639.82. A true and correct copy of the judgment is attached hereto as **Exhibit A**.

3. The judgment was registered in the United States District Court for the Central District of California, Case No. MC10-0309, on August 10, 2010. A true and correct copy of the registered judgment is attached as **Exhibit B**.

4. Attached hereto as **Exhibit C** is a true and correct copy of the notice of lien filed on Hendricks & Lewis’s behalf in this action on January 3, 2011.

5. From 2005 through August 2008, Hendricks & Lewis represented George Clinton in numerous matters and cases.

6. When Hendricks & Lewis resigned as Clinton’s counsel in August 2008, Clinton was indebted to it for more than \$1.5 million in unpaid attorneys’ fees and costs.

7. Clinton failed to make any payments to Hendricks & Lewis or make any arrangement to do so. Beyond that Clinton failed to even respond to serious settlement proposals of Hendricks & Lewis.

8. Consequently, Hendricks & Lewis initiated arbitration before the American Arbitration Association in March 2009 under its agreement with Clinton.

9. The Allan Law Group PLLC appeared at the end of the arbitration on Clinton's behalf.

10. After a hearing on the merits, the arbitration panel awarded Hendricks & Lewis \$1,519,712.74 plus attorneys' fees and costs of \$155,927.

11. Again, Clinton failed to pay, make any arrangement to pay, or even enter into settlement discussions with Hendricks & Lewis.

12. Hendricks & Lewis petitioned the United States District Court for the Western District of Washington for an order confirming the arbitration award and for judgment thereon.

13. Clinton, represented by The Allan Law Group, a professional corporation, unsuccessfully opposed confirmation and moved unsuccessfully to vacate the arbitration award.

14. On May 28, 2010, that court entered judgment in Hendricks & Lewis's favor and against Clinton for \$1,675,639.82 plus interest.

15. Clinton has not voluntarily paid any portion of the judgment; every payment on the judgment has been through a judicial process.

16. On January 3, 2011, Hendricks & Lewis filed a notice of lien in this action based on its judgment.

17. As of June 22, 2012, \$1,405,685.35 remains due on the judgment.

18. Wlodinguer, Erk & Chanzis (“WEC”) provided audit services to Clinton in two actions, one against Universal Music Group and one against Capitol Records.

19. Attached hereto as **Exhibit D** is a true and correct copy of the docket for the action *Wlodinguer & Erk, CPA’s, PLLC v. George Clinton*, Civil Action No. 10-04394-SHS-AJP (S.D.N.Y.).

20. Attached hereto as **Exhibit E** is a true and correct copy of an article published on [www.huffingtonpost.com](http://www.huffingtonpost.com) on April 27, 2012.

21. Attached hereto as **Exhibit F** is a true and correct copy of a declaration containing a summary of Clinton’s financial resources obtained from third-party subpoenas and submitted in *Hendricks & Lewis PLLC v. Clinton*, Case No. 2:10-cv-09921-ODW-PLA (C.D. Cal.). Due to the size of the exhibits to the declaration, only the declaration has been attached but the complete declaration with exhibits can be found at Docket No. 195 in the aforementioned action.

22. Attached hereto as **Exhibit G** is a true and correct copy of the exhibits to the Declaration of Mary H. Haas in Support of Motion for Assignment Order, Restraining Order, and Turnover Order filed on April 1, 2011, in the action *Hendricks & Lewis PLLC v. Clinton*, Case No. 2:10-cv-

09921-ODW-PLA (C.D. Cal.). The declaration itself can be found at Docket No. 60-3 in that action.

23. In July 2011, Clinton sued Hendricks & Lewis in the Western District of Washington under a variety of theories, including allegations of malpractice, and then argued to this Court, in *Hendricks & Lewis v. Clinton*, CV10-09921 (C.D. Cal.), that Clinton's malpractice claims against Hendricks & Lewis provided an adequate basis under CAL. CODE CIV. PRO. § 918.5 to release all of the Hendricks & Lewis levies and stay the enforcement proceeding pending the outcome of the case in the Western District of Washington:

The Washington federal court malpractice action is now pending, the value of which would arguably exceed the existing judgment against Mr. Clinton, and which clearly show creditor's violations of ethical and professional standards, the levies should be released and the action stayed pending outcome of this case.

Defendant's Motion Under Fed. R. Civ. P. 69 for Release of Levies, Stay of Enforcement, and for Implementation of Installment Payment Plan at 16 (Dkt. No. 201).

24. The Court did not rule on Clinton's motion.

25. All of Clinton's claims in the malpractice case in the Western

District of Washington against Hendricks & Lewis have been dismissed on motions for failure to state claims upon which relief can be granted and statute of limitations.

26. Attached hereto as **Exhibit H** are a letter from Robert J. Allan of the Allan Law Group P.C. to the parties herein through their respective counsel dated May 22, 2012, together with the attachments, the “Assignment of Monies dated November 30, 2010, and the UCC Notice of Lien filed with the California Secretary of State.

27. Attached hereto as **Exhibit I** is a true and correct copy of the docket for the action *George Clinton v. Will Adams, p/k/a/ will.i.am, et al.* Case No. CV 10-09476 ODW (PLAx) (C.D. Cal. 2012).


28. From the beginning of Hendricks & Lewis’ representation in 2005 through the present, George Clinton has claimed to be a resident of Florida. Attached hereto as **Exhibit J** is a true and correct copy of the Declaration of George Clinton in *Clinton v. Hendricks & Lewis, et al.*, in the U.S. District Court for the Western District of Washington, CV11-01142-RSL, dated March 5, 2012, in which he confirms he is a resident of Florida (*see* ¶ 3). In sworn testimony in a debtor’s examination hearing on June 12, 2012, in *Hendricks & Lewis v. Clinton*, also in the Western District of Washington, CV12-00841-MJP, Mr. Clinton again confirmed that he is a

resident of Florida and has been for approximately 15 years.

29. Attached hereto as **Exhibit K** is a true and correct copy of a Florida UCC filings search report, done at the request of our counsel Davis Wright Tremaine LLP, reflecting Florida UCC filings for “Clinton, George” through May 30, 2012, and that does not show a UCC filing made by the Allan Law Group.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Signed at Seattle, Washington, this 25<sup>th</sup> day of June, 2012.

  
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O. Yale Lewis, Jr.

# **EXHIBIT A**



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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

HENDRICKS & LEWIS PLLC, a Washington  
professional limited liability company,

Petitioner,

vs.

GEORGE CLINTON, an individual,

Respondent.

Case No. C10-0253-JCC

AMENDED JUDGMENT

The Final Award dated February 4, 2010, issued in the matter of *Hendricks & Lewis, PLLC and George Clinton*, Case Number 75-194-Y-000102-09, before the American Arbitration Association, having been confirmed by Order of this Court on May 27, 2010, IT IS ADJUDGED that Petitioner Hendricks & Lewis, PLLC is awarded JUDGMENT in its favor as follows:

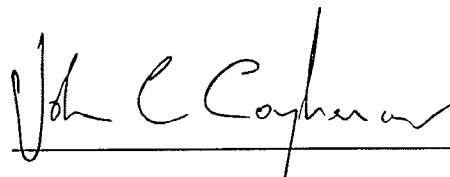
1. Final Judgment in favor of Hendricks & Lewis, PLLC and against Respondent George Clinton in the amount of \$1,675,639.82.
2. The amount awarded by this Judgment shall accrue post-judgment interest at .38 percent, as provided in 28 U.S.C. § 1961, from the date of entry of this Judgment.
3. Petitioner Hendricks & Lewis, PLLC is awarded taxable costs against Respondent George Clinton.

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4. The Clerk shall enter Final Judgment in favor of Hendricks & Lewis, PLLC in accordance herewith.

DATED this 28th day of May, 2010.



John C. Coughenour  
UNITED STATES DISTRICT JUDGE

## **EXHIBIT B**

**United States District Court**  
WESTERN DISTRICT OF WASHINGTON

Hendricks & Lewis PLLC,  
a Washington professional limited  
liability company

v.

George Clinton, an individual

**CERTIFICATION OF JUDGMENT  
FOR REGISTRATION IN  
ANOTHER DISTRICT**

**FILED**  
2010 AUG 10 AM 10:54  
CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES  
BY: [Signature]

2:10-mc-309

Case Number: ~~CV10-0253-JCC~~

I, BRUCE RIFKIN, Clerk of this United States District Court certify that the attached amended judgment is a true and correct copy of the original amended judgment entered in this action on May 28, 2010, as it appears in the records of this court, and that no notice of appeal from this judgment has been filed, and no motion of any kind listed in the Rule 4(a) of the Federal Rules of Appellate Procedure has been filed..

IN TESTIMONY WHEREOF, I sign my name and affix the seal of this Court on August 3, 2010.

\_\_\_\_\_  
BRUCE RIFKIN  
Clerk

\_\_\_\_\_  
*C. Ledesma*  
C. Ledesma, Deputy Clerk

Case 2:10-mc-00309-UA Document 1 Filed 08/10/10 Page 2 of 4 Page ID #:2

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

2:10-mc-309

HENDRICKS & LEWIS PLLC, a Washington  
professional limited liability company,

Case No. ~~C10-0253-JCC~~

Petitioner,

AMENDED JUDGMENT

vs.

GEORGE CLINTON, an individual,

Respondent.

The Final Award dated February 4, 2010, issued in the matter of *Hendricks & Lewis, PLLC and George Clinton*, Case Number 75-194-Y-000102-09, before the American Arbitration Association, having been confirmed by Order of this Court on May 27, 2010, IT IS ADJUDGED that Petitioner Hendricks & Lewis, PLLC is awarded JUDGMENT in its favor as follows:

1. Final Judgment in favor of Hendricks & Lewis, PLLC and against Respondent George Clinton in the amount of \$1,675,639.82.

2. The amount awarded by this Judgment shall accrue post-judgment interest at .38 percent, as provided in 28 U.S.C. § 1961, from the date of entry of this Judgment.

3. Petitioner Hendricks & Lewis, PLLC is awarded taxable costs against Respondent George Clinton.

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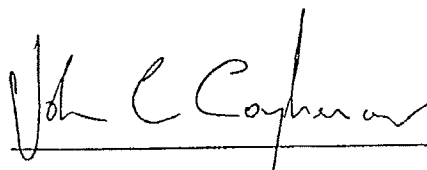
CERTIFIED TRUE COPY  
ATTEST: BRUCE RIFKIN  
Clerk, U.S. District Court  
Western District of Washington

By Cassella O. Ledwith  
Deputy Clerk

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4. The Clerk shall enter Final Judgment in favor of Hendricks & Lewis, PLLC in accordance herewith.

DATED this 28th day of May, 2010.



John C. Coughenour  
UNITED STATES DISTRICT JUDGE

## **EXHIBIT C**



ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address): Mary H. Haas - Davis Wright Tremaine 213-633-6800 865 South Figueroa St., Suite 2400 (maryhaas@dwt.com) Los Angeles, CA 90017-2566 BAR NO: 149770		TELEPHONE NO.:	FOR COURT USE ONLY  2011 JAN -3 PM 2:43 CENTRAL DISTRICT COURT LOS ANGELES, CALIF.
ATTORNEY FOR LIEN CLAIMANT: Hendricks & Lewis PLLC			
NAME OF COURT: United States District Court, Central District of California STREET ADDRESS: 312 North Spring Street MAILING ADDRESS: Los Angeles, CA 90012 CITY AND ZIP CODE: BRANCH NAME:			
PLAINTIFF: GEORGE CLINTON  DEFENDANT: v. WILL ADAMS, et al.		CASE NUMBER: 2:10-cv-09476-ODW-PLA	
<b>NOTICE OF LIEN</b> (Attachment—Enforcement of Judgment)			

FILED

**ALL PARTIES IN THIS ACTION ARE NOTIFIED THAT**

1. A lien is created by this notice under
  - a.  Article 3 (commencing with section 491.410) of Chapter 11 of Title 6.5 of Part 2 of the Code of Civil Procedure.
  - b.  Article 5 (commencing with section 708.410) of Chapter 6 of Title 9 of Part 2 of the Code of Civil Procedure.
2. The lien is based on a
  - a.  right to attach order and an order permitting the creation of a lien (copies attached).
  - b.  money judgment.
3. The right to attach order or the money judgment is entered in the following action:
  - a. Title of court (specify): United States District Court, Central District California
  - b. Name of case (specify): Hendricks & Lewis PLLC v. George Clinton, an individual
  - c. Number of case (specify): 2:10-MC-309
  - d.  Date of entry of judgment (specify): 8/10/10
  - e.  Dates of renewal of judgment (specify):
4. The name and address of the judgment creditor or person who obtained the right to attach order are (specify):  
 Hendricks & Lewis PLLC, 901 Fifth Avenue, Ste. 4100, Seattle, Washington 98164
5. The name and last known address of the judgment debtor or person whose property is subject to the right to attach order are (specify):  
 George Clinton, 1300 Hendrix Road, Tallahassee, Florida 32301
6. The amount required to satisfy the judgment creditor's money judgment or to secure the amount to be secured by the attachment at the time this notice of lien is filed is  
 \$ 1,632,448.09 including interest thru 12/10/10 plus \$16.99 per diem thereafter
7. The lien created by this notice attaches to any cause of action of the person named in item 5 that is the subject of this action or proceeding and to that person's rights to money or property under any judgment subsequently procured in this action or proceeding.
8. No compromise, dismissal, settlement, or satisfaction of this action or proceeding or any of the rights of the person named in item 5 to money or property under any judgment procured in this action or proceeding may be entered into by or on behalf of that person, and that person may not enforce any rights to money or property under any judgment procured in this action or proceeding by a writ or otherwise, unless one of the following requirements is satisfied:
  - a. the prior approval by order of the court in this action or proceeding has been obtained;
  - b. the written consent of the person named in item 4 has been obtained or that person has released the lien; or
  - c. the money judgment of the person named in item 4 has been satisfied.

**NOTICE** The person named in item 5 may claim an exemption for all or any portion of the money or property within 30 days after receiving notice of the creation of the lien. The exemption is waived if it is not claimed in time.

Date: 12/28/10  
 Mary H. Haas, Esq. (SBN: 149770)  
 (TYPE OR PRINT NAME)  (SIGNATURE OF LIEN CLAIMANT OR ATTORNEY)

AO 451 (Rev. 2/96) Certification of Judgment

~~Case 2:10-cv-09476-ODW -PLA Document 9 Filed 01/03/11 Page 2 of 6 Page ID #:65~~

**United States District Court**  
WESTERN DISTRICT OF WASHINGTON

Hendricks & Lewis PLLC,  
a Washington professional limited  
liability company

v.

George Clinton, an individual

**CERTIFICATION OF JUDGMENT  
FOR REGISTRATION IN  
ANOTHER DISTRICT**

BY BRUCE RIFKIN  
CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

2010 AUG 10 AM 10:05

**FILED**

2:10-mc-309

Case Number: ~~CV10-0253-JCC~~

I, BRUCE RIFKIN, Clerk of this United States District Court certify that the attached amended judgment is a true and correct copy of the original amended judgment entered in this action on May 28, 2010, as it appears in the records of this court, and that no notice of appeal from this judgment has been filed, and no motion of any kind listed in the Rule 4(a) of the Federal Rules of Appellate Procedure has been filed..

IN TESTIMONY WHEREOF, I sign my name and affix the seal of this Court on August 3, 2010.

BRUCE RIFKIN  
Clerk

C. Ledesma  
C. Ledesma, Deputy Clerk

2/10/2010 11:05:14 AM Receipt #: 111001  
Cashier: KENNETH LIA 1-11  
Paid by: KENNETH LIA 1-11  
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0210-000000 Indexing Misc. (paper) 150.00  
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0210-010000 Judicial Services (paper) 110.00  
Account:  
On of Payment: 77% / 33.00  
Total Payment: 48.00

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

2:10-mc-309

HENDRICKS & LEWIS PLLC, a Washington  
professional limited liability company,

Case No. ~~C10-0253-JCC~~

Petitioner,

AMENDED JUDGMENT

vs.

GEORGE CLINTON, an individual,

Respondent.

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1. Final Judgment in favor of Hendricks & Lewis, PLLC and against Respondent George Clinton in the amount of \$1,675,639.82.
2. The amount awarded by this Judgment shall accrue post-judgment interest at .38 percent, as provided in 28 U.S.C. § 1961, from the date of entry of this Judgment.
3. Petitioner Hendricks & Lewis, PLLC is awarded taxable costs against Respondent George Clinton.

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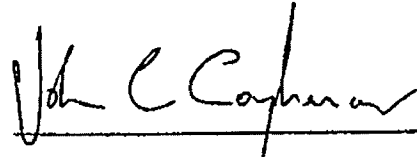
CERTIFIED TRUE COPY  
ATTEST: BRUCE BIFKIN  
Clerk, U.S. District Court  
Western District of Washington

By Cassels O. Lidman  
Deputy Clerk

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4. The Clerk shall enter Final Judgment in favor of Hendricks & Lewis, PLLC in accordance herewith.

DATED this 28th day of May, 2010.



John C. Coughenour  
UNITED STATES DISTRICT JUDGE

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PROOF OF SERVICE BY MAIL

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is Davis Wright Tremaine LLP, Suite 2400, 865 South Figueroa Street, Los Angeles, California 90017-2566.

On January 3, 2011, I served the foregoing document(s) described as: NOTICE OF LIEN by placing a true copy of said document(s) enclosed in a sealed envelope(s) for each addressee named below, with the name and address of the person served shown on the envelope as follows:

George Clinton  
1300 Hendrix Road  
Tallahassee, FL 32301

Robert J. Allan, Esq.  
Robert Alan Rummelsburg, Esq.  
ALLAN LAW GROUP PC  
22917 Pacific Coast Highway  
Suite 350  
Malibu, CA 90265

I placed such envelope(s) with postage thereon fully prepaid for deposit in the United States Mail in accordance with the office practice of Davis Wright Tremaine LLP, for collecting and processing correspondence for mailing with the United States Postal Service. I am familiar with the office practice of Davis Wright Tremaine LLP, for collecting and processing correspondence for mailing with the United States Postal Service, which practice is that when correspondence is deposited with the Davis Wright Tremaine LLP, personnel responsible for delivering correspondence to the United States Postal Service, such correspondence is delivered to the United States Postal Service that same day in the ordinary course of business.

Executed on January 3, 2011, at Los Angeles, California.

- State I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.
- Federal I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

\_\_\_\_\_  
Dee Keegan

*Dee Keegan*  
\_\_\_\_\_  
Signature

## **EXHIBIT D**

**U.S. District Court  
Southern District of New York (Foley Square)  
CIVIL DOCKET FOR CASE #: 1:10-cv-04394-SHS -AJP**

Wlodinguer &Erk CPA's, PLLC v. Clinton  
Assigned to: Judge Sidney H. Stein  
Referred to: Magistrate Judge Andrew J. Peck  
Demand: \$265,000  
Cause: 28:1332 Diversity-Breach of Contract

Date Filed: 06/03/2010  
Date Terminated: 12/07/2010  
Jury Demand: Both  
Nature of Suit: 190 Contract: Other  
Jurisdiction: Diversity

**Plaintiff**

**Wlodinguer &Erk CPA's, PLLC**  
*as successor-in-interest to Wlodinguer,  
Erk &Chanzis, CPA's PLLC*

represented by **Brian D. Caplan**  
Caplan &Ross,LLP  
270 Madison Avenue  
13th Floor  
New York, NY 10016  
(212) 973-2376  
Fax: (212) 661-4290  
Email: [bcaplan@caplanross.com](mailto:bcaplan@caplanross.com)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

V.

**Defendant**

**George Clinton**

represented by **Amelia Katherine Brankov**  
Frankfurt Kurnit Klein &Selz, P.C.  
488 Madison Avenue  
New York, NY 10022  
(212)-980-0120  
Fax: (212)-593-9175  
Email: [abrankov@fkks.com](mailto:abrankov@fkks.com)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

**Brian Edward Maas**  
Frankfurt Kurnit Klein &Selz, P.C.  
488 Madison Avenue  
New York, NY 10022  
(212) 705-4836  
Fax: (212) 593-9175  
Email: [bmaas@fkkslaw.com](mailto:bmaas@fkkslaw.com)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

**Jie Julia Zhu**  
Allan Law Group P.C.  
22917 Pacific Coast Highway, Suite 350  
Malibu, CA 90265  
310-456-3024  
Fax: 310-317-0484  
**PRO HAC VICE**  
**ATTORNEY TO BE NOTICED**

**Robert J. Allan**  
Allan Law Group P.C.  
22917 Pacific Coast Highway, Suite 350  
Malibu, CA 90265  
310-456-3024  
Fax: 310-317-0484  
Email: [allan@rjallanlaw.com](mailto:allan@rjallanlaw.com)



*PRO HAC VICE*  
*ATTORNEY TO BE NOTICED*

**Rod Rummelsburg**  
 Alan B. Brill P.C.  
 49 North Airmont Road  
 Suffern, NY 10901  
 310-456-3024  
 Fax: 310-317-0484  
 Email: [rod@rjallanlaw.com](mailto:rod@rjallanlaw.com)  
*PRO HAC VICE*  
*ATTORNEY TO BE NOTICED*

Date Filed	#	Docket Text
06/03/2010	<u>1</u>	COMPLAINT against George Clinton. (Filing Fee \$ 350.00, Receipt Number 905370) Document filed by Wlodinguer & Erk, CPA's, PLLC. (rdz) Modified on 6/3/2010 (rdz). (Entered: 06/03/2010)
06/03/2010		SUMMONS ISSUED as to George Clinton. (rdz) (Entered: 06/03/2010)
06/03/2010		Magistrate Judge Andrew J. Peck is so designated. (rdz) (Entered: 06/03/2010)
06/03/2010		Case Designated ECF. (rdz) (Entered: 06/03/2010)
06/03/2010	<u>2</u>	RULE 7.1 CORPORATE DISCLOSURE STATEMENT. No Corporate Parent. Document filed by Wlodinguer & Erk, CPA's, PLLC. (rdz) (rdz). Modified on 6/3/2010 (rdz). (Entered: 06/03/2010)
06/28/2010	<u>3</u>	ORDER REFERRING CASE TO MAGISTRATE JUDGE: Order that case be referred to the Clerk of Court for assignment to a Magistrate Judge for General Pretrial (includes scheduling, discovery, non-dispositive pretrial motions, and settlement). Referred to Magistrate Judge Andrew J. Peck. (Signed by Judge Sidney H. Stein on 6/28/2010) (js) (Entered: 06/28/2010)
06/28/2010		Transmission to Case Assignment Clerk. Transmitted re: <u>3</u> Order Referring Case to Magistrate Judge,, to the Case Assignment Clerk for preparation of notice of case assignment/reassignment. (js) (Entered: 06/28/2010)
06/29/2010	<u>4</u>	ORDER: This case has been referred to me by Judge Stein for general pretrial purposes. the parties are advised to provide Chambers with a courtesy copy of all papers hereafter filed with the Court in this matter. As soon as defendant has responded to the complaint or counsel for defendant has appeared, whichever first occurs, the parties shall call my Magistrate Judge Pecks' secretary (at 212-805-0036) to schedule the initial pretrial conference. Plaintiff is to serve this Order on defendant or defendant's counsel. The parties are to follow the "Individual Practices of Magistrate Judge Andrew J. Peck," a copy of which is enclosed. So Ordered (Signed by Magistrate Judge Andrew J. Peck on 6/29/2010) (js) (Entered: 06/29/2010)
07/21/2010	<u>5</u>	AFFIDAVIT OF SERVICE. George Clinton served on 7/16/2010, answer due 8/6/2010. Service was accepted by George Clinton, Defendant. Document filed by Wlodinguer & Erk CPA's, PLLC. (Ross, Jonathan) (Entered: 07/21/2010)
09/07/2010	<u>6</u>	ORDER: Plaintiff is to move for default judgment by September 20, 2010. Plaintiff is to serve this Order on Defendant and file an affidavit of service with the Clerk of Court. So Ordered. (Signed by Magistrate Judge Andrew J. Peck on 9/7/2010) Copies by fax and ECF (js) (Entered: 09/07/2010)
09/14/2010	<u>7</u>	STIPULATION AND ORDER FOR EXTENSION OF TIME FOR DEFENDANT GEORGE CLINTON TO RESPOND TO COMPLAINT AND FOR PLAINTIFF TO FORBEAR FROM FILING FOR DEFAULT: George Clinton answer due 9/19/2010. (Signed by Magistrate Judge Andrew J. Peck on 9/14/2010) Copies Faxed By Chambers. (jar) (Entered: 09/14/2010)
09/15/2010	<u>8</u>	RULE 16 IPTC SCHEDULING ORDER: The time for defendant to respond to the complaint is extended to 9/19/10. Plaintiff is to identify the citizenship of all

		members of the plaintiff LLCs, by 9/19/10. All fact and expert discovery must be completed by 12/31/10. Expert reports must be served by 10/15/10 plaintiffs, 11/15/10 defendant. Mandatory initial disclosure pursuant to Rule 26(a)(1), Fed. R. Civ. P., is due 9/30/10. The parties shall discuss any issues with respect to electronic discovery before the next court conference. Each party will notify this Court (and the District Judge) by 1/4/11 as to whether it intends to move for summary judgment. Summary judgment motions must be filed by 1/24/11, and must comply with the Federal Rules of Civil Procedure, the Local Rules of this Court, and the chamber rules of the District Judge to whom this case is assigned. The parties are to submit a joint proposed pretrial order, in conformance with the Federal Rules of Civil Procedure, the Local Rules of this Court, and the chamber rules of the District Judge to whom this case is assigned, by 1/24/11 if neither party is moving for summary judgment, or 30 days after decision on the summary judgment motion. The case will be considered trial ready on 24-hours notice after the pretrial order has been submitted. A status conference will be held before the undersigned on 10/8/10 at 2:00 p.m. in Courtroom 20D (500 Pearl Street). Defendant's California counsel may appear telephonically; both sides' New York counsel must appear in person. The parties are directed to follow the "Individual Practices of Magistrate Judge Andrew J. Peck," a copy of which is enclosed. (Signed by Magistrate Judge Andrew J. Peck on 9/15/2010) Copies Faxed By Chambers. (jfe) Modified on 9/30/2010 (jfe). (Entered: 09/15/2010)
09/17/2010	<u>9</u>	ANSWER to Complaint with JURY DEMAND. Document filed by George Clinton.(Maas, Brian) (Entered: 09/17/2010)
09/17/2010	<u>10</u>	MOTION for Rod Rummelsburg to Appear Pro Hac Vice. Document filed by George Clinton.(mro) (Entered: 09/17/2010)
09/17/2010	<u>11</u>	MOTION for Jie (Julia) Zhu to Appear Pro Hac Vice. Document filed by George Clinton.(mro) (Entered: 09/17/2010)
09/17/2010	<u>12</u>	MOTION for Robert J. Allan to Appear Pro Hac Vice. Document filed by George Clinton.(mro) (Entered: 09/17/2010)
09/23/2010	<u>13</u>	ORDER FOR ADMISSION OF ROBERT J. ALLAN PRO HAC VICE: granting <u>12</u> Motion for Robert J. Allan to Appear Pro Hac Vice. (Signed by Judge Sidney H. Stein on 9/23/2010) (jfe) (Entered: 09/23/2010)
09/23/2010	<u>14</u>	ORDER FOR ADMISSION OF HI (JULIA) ZHU PRO HAC VICE: granting <u>11</u> Motion for Jie (Julia) Zhu to Appear Pro Hac Vice. (Signed by Judge Sidney H. Stein on 9/23/2010) (jfe) (Entered: 09/23/2010)
09/23/2010	<u>15</u>	ORDER FOR ADMISSION OF ROD RUMMELSBURG PRO HAC VICE: granting <u>10</u> Motion for Rod Rummelsburg to Appear Pro Hac Vice. (Signed by Judge Sidney H. Stein on 9/23/2010) (jfe) Modified on 12/6/2010 (jfe). (Entered: 09/23/2010)
09/27/2010	<u>16</u>	NOTICE OF APPEARANCE by Amelia Katherine Seewann on behalf of George Clinton (Seewann, Amelia) (Entered: 09/27/2010)
09/30/2010		CASHIERS OFFICE REMARK on <u>10</u> Motion to Appear Pro Hac Vice, <u>12</u> Motion to Appear Pro Hac Vice, <u>11</u> Motion to Appear Pro Hac Vice in the amount of \$75.00, paid on 09/17/2010, Receipt Number 915420. (jd) (Entered: 09/30/2010)
10/04/2010	<u>17</u>	NOTICE OF APPEARANCE by Rod Rummelsburg on behalf of George Clinton (Rummelsburg, Rod) (Entered: 10/04/2010)
10/08/2010		Minute Entry for proceedings held before Magistrate Judge Andrew J. Peck: Case Management Conference held on 10/8/2010. Status Conference set for 11/15/2010 at 02:30 PM before Magistrate Judge Andrew J. Peck. (mro) (Entered: 10/18/2010)
10/14/2010	<u>18</u>	NOTICE OF APPEARANCE by Robert J. Allan on behalf of George Clinton (Allan, Robert) (Entered: 10/14/2010)
10/19/2010	<u>19</u>	STIPULATION AND PROTECTIVE ORDER...regarding procedures to be followed that shall govern the handling of confidential material... (Signed by Magistrate Judge Andrew J. Peck on 10/19/2010) (jpo) (Entered: 10/19/2010)

11/15/2010		Minute Entry for proceedings held before Magistrate Judge Andrew J. Peck: Status Conference held on 11/15/2010, ( Status Conference set for 12/10/2010 at 02:00 PM before Magistrate Judge Andrew J. Peck.) Mr. Caplan to make vol. contribution of \$ 250.00 to Clerk of Court by 11/19/2010. (mbe) (Entered: 11/18/2010)
11/17/2010	20	TRANSCRIPT of proceedings held on Ocotber 8, 2010 2:05 p.m. before Magistrate Judge Andrew J. Peck. (ajc) (Entered: 11/19/2010)
12/01/2010	21	TRANSCRIPT of proceedings held on 11/15/2010 before Magistrate Judge Andrew J. Peck. (mbe) (Entered: 12/01/2010)
12/07/2010	<u>22</u>	ORDER OF DISMISSAL ON CONSENT: The parties having informed the Court that they have reached a settlement agreement in principle and are finalizing settlement documents (see attached letter), IT IS HEREBY ORDERED THAT this action is dismissed with prejudice and without costs, provided, however, that any party may reinstate the action within 30 days hereof if the settlement is not fully effectuated. Any pending motions are to be terminated as moot. (Signed by Magistrate Judge Andrew J. Peck on 12/7/2010) (jfe) (Entered: 12/07/2010)
01/07/2011	<u>23</u>	ENDORSED LETTER addressed to Magistrate Judge Andrew J. Peck from Jonathan J. Ross dated 1/6/11 re: We respectfully request that the time within which Plaintiff may apply to restore the action to the calendar be extended to January 20, 2011. ENDORSEMENT: Extension approved. So ordered. Copies sent by Chambers via ECF. (Signed by Magistrate Judge Andrew J. Peck on 1/7/11) (rjm). (Entered: 01/07/2011)
01/07/2011	<u>24</u>	DOCUMENT FILED IN A CLOSED CASE – STIPULATION OF VOLUNTARY DISMISSAL It is hereby stipulated and agreed by and between the parties and/or their respective counsel(s) that the above-captioned action is voluntarily dismissed, with prejudice against the defendant(s) George Clinton and without costs to either party pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure. Document filed by Wlodinguer & Erk CPA's, PLLC.(Ross, Jonathan) Modified on 1/10/2011 (ml). (Entered: 01/07/2011)
01/10/2011		***NOTE TO ATTORNEY – VOLUNTARY DISMISSAL FILED IN CLOSED CASE. Note to Attorney Jonathan Ross Document <u>24</u> Stipulation of Voluntary Dismissal, was filed in a closed case. (ml) (Entered: 01/10/2011)
01/10/2011	<u>25</u>	STIPULATION AND ORDER OF DISCONTINUANCE WITH PREJUDICE: This action is discontinued with prejudice, without costs to any party against the other. (Signed by Magistrate Judge Andrew J. Peck on 1/10/11) (db) (Entered: 01/10/2011)

## **EXHIBIT E**

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June 14, 2012

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## Shira Lazar

Co-Founder,  
WhatsTrending.com

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# How George Clinton Is Using Indiegogo To #SaveFunk Online

Posted: 04/27/2012 4:57 pm

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George Clinton goes by many monikers: the Funkmaster, The Granddaddy of Funk, and my personal favorite, Dr. Funkenstein.

Whatever you choose to call him, Clinton is a true music legend, and stopped by What's Trending live on Wednesday sporting a new look without his trademark hairdo.

Clinton, a recent recipient of an honorary Doctor of Music degree from Berklee College of Music, is trying to raise money via the charity-hosting website IndieGoGo.

"We're raising money to redo a studio, to put out some of this music we got," he said. "We have a lot of music that never came out. So we have to do a lot of refurbishing. IndieGoGo is helping us do that."

Donating online on [indiegogo.com/Georgeclinton](http://indiegogo.com/Georgeclinton) earns those who donate some perks, like unreleased music. Clinton said he didn't even know what the Internet was when he started making music, but he says it's a great distribution platform.

However, he's had some legal problems with people stealing his jams, as well as never ending disputes with labels from age-old contracts that have no relevance to today's new business models. He mentioned how he doesn't make a cent from his music being sampled or used in blockbuster films like the Oscar-nominated *Moneyball*. His advice for aspiring musicians? Know everything you can about music copyright laws.

"When we meet the goal of this (fundraising campaign), we're going to start our legal defense fund," Clinton said. "With the downloads and everything like that, they don't pay you for that." He's also teamed up with Michigan Congressman John Conyers Jr. for a project called the P-Funk Initiative.

He shared his message to the music labels: "This is why you're going out of business. The Internet is taking over. You're not paying artists. You're not paying people. This is your own fault that the record business is going out of business."

Clinton, who regularly uses social media platforms, says he is actually making more money online selling less than he would make selling more with a label. He likes being able to cut out a middle man.

"You got all these new ways of tracking down your money," he said. "You can email somebody, a fan, a brand new album, right from your own office. We're doing that."

You can follow George on Twitter [@george\\_clinton](https://twitter.com/george_clinton). His website is [Funkprobosci.org](http://Funkprobosci.org).

We were also lucky enough to have him deliver a spoken word performance of the song "U.S. Custom Coastal Dope Dog!"

Follow Shira Lazar on Twitter: [www.twitter.com/shiralazar](http://www.twitter.com/shiralazar)

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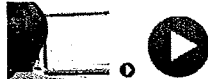
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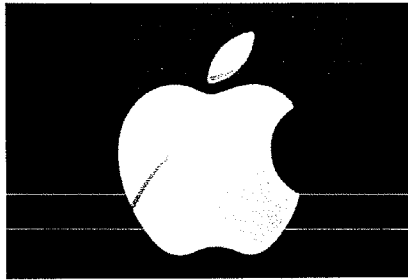
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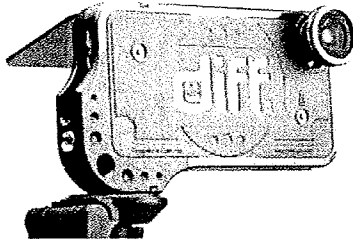
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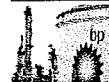
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## **EXHIBIT F**

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11 Telephone (213) 633-6800  
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13 Mary H. Haas (State Bar No. 149770)  
14 maryhaas@dwt.com

15 Attorneys for Plaintiff  
16 HENDRICKS & LEWIS PLLC

17 UNITED STATES DISTRICT COURT  
18 CENTRAL DISTRICT OF CALIFORNIA

19 HENDRICKS & LEWIS PLLC, a  
20 Washington professional limited  
21 liability company,

22 Plaintiff,

23 vs.

24 GEORGE CLINTON, an individual,

25 Defendant.

Case No. CV10-09921 ODW (PLAx)

**DECLARATION OF KATHERINE  
HENDRICKS**

Date: November 21, 2011  
Time: 9:00 a.m.

Action Filed: August 10, 2010

26 I, Katherine Hendricks, declare and state as follows:

27 1. I am an attorney admitted to practice before all the courts of the State  
28 of Washington and have been admitted pro hac vice in this action. I am a partner  
of the firm Hendricks & Lewis PLLC, Plaintiff in this action (“H&L” or the  
“Judgment Creditor”). This declaration is based upon personal knowledge, except

1 those matters stated upon information and belief, which matters I believe to be  
2 true.

3 2. I submit this declaration in support of Plaintiff's Opposition to  
4 Defendant's Motion under Fed. R. Civ. P. 69 for Release of Levies, Stay of  
5 Enforcement, and for Implementation of Installment Payment Plan.

6 **H&L's Judgment and Enforcement**

7 3. On May 28, 2010, the United States District Court of the Western  
8 District of Washington entered an Amended Judgment against George Clinton  
9 ("Clinton" or the "Judgment Debtor") in favor of Hendricks & Lewis PLLC in the  
10 amount of \$1,675,639.82 (the "Judgment").

11 4. As of October 25, 2011, H&L has received a total of \$283,501.80 in  
12 partial satisfaction of the Judgment, primarily from sums garnished from Clinton's  
13 accounts.

14 5. Because of Clinton's continued objections, H&L has spent nearly an  
15 equal amount in out-of-pocket costs in connection with its efforts to collect on the  
16 Judgment.

17 6. The balance of the Judgment that remains unsatisfied, as of October  
18 25, 2011, including accrued interest and costs, after payments from Clinton and  
19 receipt of sums garnished from Clinton's accounts have been credited, is  
20 \$1,402,152.15.

21 **Proceedings in the Northern District of Florida**

22 7. On August 16, 2010, H&L registered the Judgment in the United  
23 States District Court of the Northern District of Florida.

24 8. In October 2010, H&L served a writ of garnishment on Farmers &  
25 Merchants Bank in Tallahassee, Florida, which filed an answer to the writ of  
26 garnishment listing two bank accounts owned by Clinton, which held a total of  
27 \$108,474.17.

28 DECLARATION OF  
KATHERINE HENDRICKS -- 2  
CV10-09921 ODW (PLAx)  
{100909.DOC }

HENDRICKS & LEWIS PLLC  
901 Fifth Avenue, Suite 4100  
Seattle, Washington 98164  
TEL: (206) 624-1933

1           9.     On February 14, 2011, H&L filed an application for issuance of writ  
2 of execution in the United States District Court of the Northern District of Florida.

3           10.    On February 18, 2011, Clinton filed a motion requesting the Court to  
4 stay the garnishment proceeding, which the Court denied on August 3, 2011. The  
5 Court referred the matter to a magistrate judge to issue reports and  
6 recommendations regarding the exemptions and garnishment. Attached hereto as  
7 **Exhibit 1** is a true and correct copy of the Order Denying Stay and Referring Case  
8 to Magistrate Judge, entered by Senior United States District Judge Stephan P.  
9 Mickle on August 3, 2011, in the United States District Court of the Northern  
10 District of Florida case number 4:10mc55-SPM/WCS.

11          11.    On August 9, 2011, United States Magistrate Judge William C.  
12 Sherrill, Jr. entered a Report and Recommendation, in which he recommended that  
13 final judgment in garnishment be entered in H&L's favor against garnishee  
14 Farmers & Merchants Bank and that a writ of execution be issued. Attached hereto  
15 as **Exhibit 2** is a true and correct copy of the Report and Recommendation entered  
16 by United States Magistrate Judge William C. Sherrill, Jr. on August 9, 2011, in  
17 the United States District Court of the Northern District of Florida case number  
18 4:10mc55-SPM/WCS.

19          12.    Clinton filed no objections to the Report and Recommendation.

20          13.    On October 12, 2011, Judge Mickle entered an order adopting the  
21 magistrate judge's Report and Recommendation, instructing the clerk to enter final  
22 judgment in garnishment in H&L's favor against garnishee Farmers & Merchants  
23 Bank in the amount of \$107,196.00 (account xxxxx401) and \$1,278.17 (account  
24 xxxxx901), and granting H&L's application for the issuance of a writ of execution.  
25 Attached hereto as **Exhibit 3** is a true and correct copy of the Order entered on  
26 October 12, 2011, in the United States District Court of the Northern District of  
27 Florida case number 4:10mc55-SPM/WCS.

28   DECLARATION OF  
KATHERINE HENDRICKS -- 3  
CV10-09921 ODW (PLAx)  
{100909.DOC }

1 14. On October 13, 2011, the Clerk of the United States District Court for  
2 the Northern District of Florida issued a writ of execution to the Marshal of the  
3 Northern District of Florida. Attached hereto as **Exhibit 4** is a true and correct  
4 copy of the Writ of Execution issued by the Clerk of the United States District  
5 Court for the Northern District of Florida on October 13, 2011.

6 15. Clinton never withdrew his opposition to H&L's garnishment of the  
7 funds in Clinton's Farmers & Merchants Bank accounts.

8 **H&L's Professional Liability Insurance**

9 16. As was disclosed to Clinton in *George Clinton v. Hendricks & Lewis*  
10 *PLLC, et al.*, Case No. 2:11-CV-01142-RSL (W.D. Wash. July 11, 2011), H&L  
11 has professional liability insurance.

12 **Clinton's EMI/Capitol and UMG Royalties**

13 17. In March 2011, in support of H&L's efforts to enforce its judgment  
14 against Clinton, H&L and Clinton jointly subpoenaed documents from various  
15 third parties from which Clinton is paid royalties and other income.

16 18. In response to the parties' joint subpoena, Capitol Records provided  
17 records for royalties accrued July 1, 2008 – December 31, 2010. The records  
18 reflect that Clinton was paid the following royalties:

19 **July 1 – December 31, 2008**

<u>Date</u>	<u>Account No.</u>	<u>Amount</u>
September 2008	xxxx38/001	\$9,530.02
September 2008	xxxxx8/002	\$153.81
September 2008	xxxxx8/008	\$461.52
September 2008	xxxx98/001	\$219.35
September 2008	xxxxx8/003	\$222.40
September 2008	xxxxx7/002	<u>\$1,450.07</u>
<b>Total July 1 – December 31, 2008</b>		<b>\$12,037.17</b>

25 **January 1 – December 31, 2009**

<u>Date</u>	<u>Account No.</u>	<u>Amount</u>
March 2009	xxxx38/001	\$31,462.33
September 2009	xxxx38/001	\$33,547.61

28 DECLARATION OF  
KATHERINE HENDRICKS -- 4  
CV10-09921 ODW (PLAx)  
{100909.DOC }

**HENDRICKS & LEWIS, PLLC**  
901 Fifth Avenue, Suite 4100  
Seattle, Washington 98164  
TEL: (206) 624-1933



1	March 2009	xxxxx8/002	\$132.80
	September 2009	xxxxx8/002	\$108.23
2	March 2009	xxxxx8/008	\$303.17
	September 2009	xxxxx8/008	\$307.68
3	March 2009	xxxx98/001	\$189.50
	September 2009	xxxx98/001	\$154.48
4	March 2009	xxxxx8/003	\$190.15
	September 2009	xxxxx8/003	\$155.20
5	March 2009	xxxxx7/002	\$3,062.22
	September 2009	xxxxx7/002	<u>\$1,489.62</u>
6	<b>Total 2009</b>		<b>\$71,102.99</b>

7	<b>January 1 – December 31, 2010</b>		
8	<u>Date</u>	<u>Account No.</u>	<u>Amount</u>
	March 2010	xxxx38/001	\$4,986.69
9	September 2010	xxxx38/001	\$2,408.11
	March 2010	xxxxx8/002	\$70.04
10	September 2010	xxxxx8/002	\$61.81
	March 2010	xxxxx8/008	\$174.87
11	September 2010	xxxxx8/008	\$194.60
	March 2010	xxxx98/001	\$99.98
12	September 2010	xxxx98/001	\$88.25
	March 2010	xxxxx8/003	\$103.41
13	September 2010	xxxxx8/003	\$90.49
14	March 2010	xxxxx7/002	\$1,481.07
	September 2010	xxxxx7/002	<u>\$1,230.33</u>
15	<b>Total 2010</b>		<b>\$10,989.65</b>
16	<b>Annual Average</b>		<b>\$37,651.92</b>

17 Attached hereto as **Exhibit 5** are true and correct redacted excerpts from the  
 18 records provided by Capitol Records in response to the subpoena.

19  
 20 19. In response to the parties' joint subpoena, Universal Music Group  
 21 ("UMG") provided records for royalties accrued January 1, 2009 – December 31,  
 22 2010. The records reflect that Clinton accrued the following royalties during that  
 23 time:

24	<u>Date</u>	<u>Account No.</u>	<u>Amount</u>
25	Period ending 6/30/2009	xxxx6304	\$51,202.81
	Period ending 12/31/2009	xxxx6304	<u>\$54,066.45</u>
26	<b>Total 2009</b>		<b>\$105,269.26</b>
27	Period ending 6/20/2010	xxxx6304	\$46,241.62

28 DECLARATION OF  
 KATHERINE HENDRICKS -- 5  
 CV10-09921 ODW (PLAx)  
 {100909.DOC }

Period ending 12/31/2010	xxxx6304	\$61,146.64
<b>Total 2010</b>		<b>\$107,388.27</b>
<b>Annual Average</b>		<b>\$106,328.77</b>

Attached hereto as **Exhibit 6** are true and correct redacted excerpts from the records provided by UMG in response to the subpoena.

20. Thus, as set forth above, Clinton earns from UMG and Capitol a total annual average of \$143,980.69. 25 percent of that amount totals \$35,995.17.

#### **Other Income**

21. In response to the parties' joint subpoena, tour booking agent Monterrey International provided records for Clinton's touring in the United States and Japan for January 1, 2009 – February 19, 2011, which reflect gross revenue of \$1,715,664.22 in 2009, \$1,719,816.91 in 2010, and \$303,526.17 in January and February of 2011. Attached hereto as **Exhibit 7** are true and correct excerpts from the records provided by Monterrey International in response to the subpoena.

22. In response to the parties' joint subpoena, tour booking agent Georg Leitner provided records for Clinton's touring in Europe for January 1, 2009 – December 31, 2010, which document gross revenue of \$165,000 in 2009 and \$160,000 in 2010. Attached hereto as **Exhibit 8** are true and correct redacted excerpts from the records provided by George Leitner in response to the subpoena.

23. In addition, Clinton receives significant royalties from Broadcast Music, Inc. ("BMI"). In response to the parties' joint subpoena, BMI provided records for royalties accrued January 1, 2009 – December 31, 2010. The records reflect that Clinton accrued a total of \$247,373.45 during that time, for an average of \$123,686.73 per year. Attached hereto as **Exhibit 9** is a true and correct redacted excerpt from the records provided by BMI in response to the subpoena.

24. Clinton also receives royalties from SoundExchange, Inc. In response to the parties' joint subpoena, SoundExchange provided records for royalties paid

DECLARATION OF  
KATHERINE HENDRICKS -- 6  
CV10-09921 ODW (PLAx)  
{100909.DOC }

HENDRICKS & LEWIS, PLLC  
901 Fifth Avenue, Suite 4100  
Seattle, Washington 98164  
TEL: (206) 624-1933

1 and/or accrued between January 1, 2009 and March 29, 2010. The records reflect  
2 that Clinton accrued a total of \$18,813.78 during that time. Attached hereto as  
3 **Exhibit 10** is a true and correct redacted excerpt from the records provided by  
4 SoundExchange in response to the subpoena.

5 I declare under penalty of perjury under the laws of the State of California  
6 and the United States of America that the foregoing is true and correct.

7 DATED this 31st day of October, 2011, at Seattle, Washington.

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/s/ Katherine Hendricks

28 DECLARATION OF  
KATHERINE HENDRICKS -- 7  
CV10-09921 ODW (PLAx)  
{100909.DOC }

HENDRICKS & LEWIS, LLC  
901 Fifth Avenue, Suite 4100  
Seattle, Washington 98164  
TEL: (206) 624-1933

## **EXHIBIT G**

# **EXHIBIT 1**



May 13, 2010

Mr. George Clinton, Jr.  
C/o A Scoop of Poop Productions, Inc.  
1300 Hendrix Road  
Tallahassee, FL 32301-4904

Dear Mr. Clinton:

This will confirm our understanding with respect to the modification of the agreement between us dated May 12, 2010 (herein called the "basic agreement"):

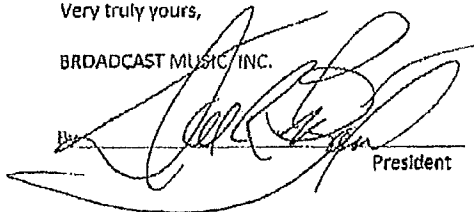
BMI agrees to pay you, upon execution hereof, an advance in the sum of Two Hundred Fifty Thousand Dollars (\$250,000) against all monies which become payable pursuant to the agreement between us dated January 1, 1968 and the basic agreement and any extensions or modifications thereof or substitutions therefor.

It is understood and agreed that BMI shall remit to U.S. Bank from the advance payable hereunder the balance due to said bank under your loan assignment to them dated May 5, 2009. The remainder of the advance shall be paid by wire transfer to Allan Law Group, P.C. Trust Account for A Scoop of Poop Productions, Inc.

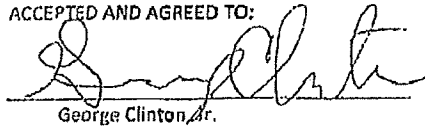
Except as herein specifically modified, all of the terms and conditions of the basic agreement are hereby ratified and affirmed.

Very truly yours,

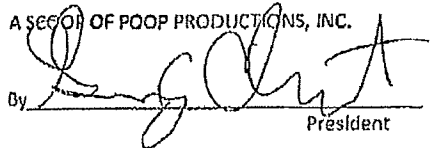
BROADCAST MUSIC, INC.

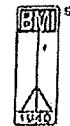
  
\_\_\_\_\_  
President

ACCEPTED AND AGREED TO:

  
\_\_\_\_\_  
George Clinton, Jr.

A SCOOP OF POOP PRODUCTIONS, INC.

By   
\_\_\_\_\_  
President



**EXHIBIT 2**

George Clinton Jr.  
1300 Hendrix Rd.  
Tallahassee, FL 32301

May 28, 2010

Via Federal Express

Broadcast Music, Inc.  
320 W. 57<sup>th</sup> Street,  
New York, NY 10019

Attention: Gary F. Roth  
Assistant Vice President  
Legal and Business Affairs, Performing Rights

Re: Account No. [REDACTED]  
IP No.: [REDACTED]

Dear Mr. Roth:

Please find enclosed herewith the following documents:

1. The new Basic Agreement dated May 12, 2010 with the revision to Paragraph 28, line 1 deleting the word "canceled" and substituting the word "terminated" in place thereof as agreed to by you on behalf of Broadcast Music, Inc. ("BMI") on May 25, 2010 duly executed by me ("Basic Agreement"); and
2. Advance Agreement by and between BMI and I dated May 13, 2010 duly executed by me both individually and as President of A Scoop of Poop Productions, Inc. ("Advance Agreement").

Pursuant to the Advance Agreement by and between me and BMI for payment of an advance of two hundred fifty thousand dollars (\$250,000), twenty five thousand five hundred nineteen dollars sixty one cents (\$25,519.61) of which is to be paid by BMI to US Bank to satisfy any and all obligations I have to them for payment of a loan made by them to me on November 24, 2008 in the amount of one hundred and eighty thousand dollars (\$180,000), this letter constitutes my irrevocable instructions to BMI to wire transfer the balance of the said advance in the amount of two hundred twenty four thousand four hundred eighty dollars thirty nine cents (\$224,480.39) to the following account:

Account Name: Allan Law Group, P.C. Trust Account  
Account Number: [REDACTED]

Page 1 of 2

000007



George Clinton Jr.  
1300 Hendrix Rd.  
Tallahassee, FL 32301

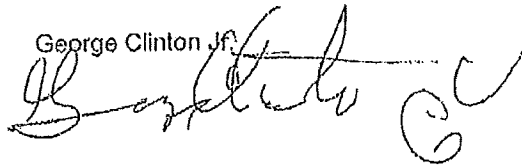
Routing number: [REDACTED]

Address: 22917 Pacific Coast Highway Ste. 350  
Malibu, CA 90265  
310-456-3024  
Bank Name: Wells Fargo  
Bank Address: 23361 Pacific Coast Hwy.  
Malibu, CA 90265  
310-317-1740

Pursuant to paragraph 2(a) of the Basic Agreement, I will send BMI a ~~current~~ completed work registration form as required by the terms of the Basic Agreement.

If you have any questions regarding this letter, the instructions contained herein or the enclosed documents, please do not hesitate to contact me at any time.

Yours Truly,

George Clinton Jr.  


## **EXHIBIT H**



May 22, 2012

*PERSONAL & CONFIDENTIAL*

Via Email Only: [allen@grodsky-olecki.com](mailto:allen@grodsky-olecki.com)  
Grodsky & Olecki LLP  
2001 Wilshire Blvd., Suite 201  
Santa Monica, CA 90403

Attention: Allen B. Grodsky, Esq.

Via Email Only: [maryhaas@dwt.com](mailto:maryhaas@dwt.com)  
Davis Wright Tremaine LLP  
865 South Figueroa St., Suite 2400  
Los Angeles, CA 90017

Attention: Mary H. Haas, Esq.

Via Email Only: [Burrow@caldwell-leslie.com](mailto:Burrow@caldwell-leslie.com)  
Caldwell Leslie and Proctor PC  
1000 Wilshire Blvd., Suite 600  
Los Angeles, CA 90017

Attention: Linda M. Burrow, Esq.

Via Email Only: [jeff@patentco.com](mailto:jeff@patentco.com)  
Dobrusin & Thennisch PC  
29 West Lawrence St., Suite 210  
Pontiac, MI 48342

Attention: Jeffrey P. Thennisch, Esq.

Via Email Only: [lhclough@sbcglobal.net](mailto:lhclough@sbcglobal.net)  
Larry Haakon Clough Law Offices  
21757 Devonshire St., Suite 2  
Chatsworth, CA 91311

Attention Larry H. Clough, Esq.

Via Email Only: [kara.cenar@bryancave.com](mailto:kara.cenar@bryancave.com)  
Bryan Cave LLP  
161 North Clark St., Suite 4300  
Chicago, IL 60601

Attention: Kara E. F. Cenar, Esq.

Re: **NOTICE OF CLAIMS OF LIEN**  
George Clinton v. Will Adams etc. et al. ("Action")  
U.S.D.C. Case No.: 2:10-CV-09476-ODW(PLAx)Dear Counsel:

Please find attached hereto copies of the following documents:

1. Two (2) page Assignment of Monies duly executed by George Clinton on November 30, 2010 before Errol W. Jones, Jr., a Notary Public in and for the State of Florida("Assignment"); and
2. Notice of Claim of Lien for Attorneys Fees and Costs filed by our firm in the above entitled action on July 19, 2011 ("Notice of Lien").

As stated in the Assignment, for valuable consideration received, the consideration being legal fees and costs in the total amount of one hundred seven thousand ninety seven dollars sixty seven cents (\$107,097.67) incurred by our firm in the representation of George Clinton in three (3) matters prior to the Action being filed by our firm, George Clinton irrevocably assigned to Allan Law Group P.C. any and all money due to him based on the claims made by him in the Action, including, but not limited to, any money or other valuable consideration, paid in partial or complete settlement of the claims in the Action.

A UCC-1 Financing Statement ("Financing Statement") based on the Assignment was filed with the California Secretary of State on December 1, 2010, Document No. 27112212002, Filing No. 10-7252964329.

The Assignment created a lien on the Action in favor of Allan Law Group P.C. effective as of November 30, 2010. Although we filed the Notice of Lien in the Action "in an excess of caution" the said Notice of Lien is superfluous to the validity and enforceability of the lien or to the determination of the priority of the lien created by the Assignment (*Setenko v. United California Bank* (1982) 30 Cal.3d 528, 531).

Our firm also claims a lien for attorneys' fees and costs for our professional services rendered and costs incurred in the Action in the amount of one hundred seventeen thousand four hundred seventy dollars five cents (\$117,470.05) from January 27, 2010, the date our firm was retained by George Clinton, to July 19, 2011, the date our firm was substituted out as counsel of record for George Clinton in the Action.

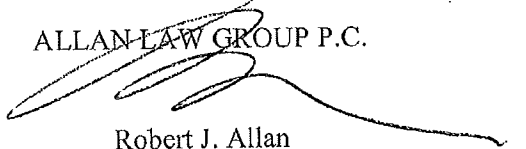
California Civil Code § 2897 provides: "Other things being equal different liens upon the same property have priority according to the time of their creation ..." The general rule in California for the determination of the priority of liens on the same property being: "First in time, first in right".

In light of the fact our firm's contractual lien on any recovery from the Action was created on and effective as of November 30, 2010; Hendricks & Lewis' Notice of Lien for Attachment-Enforcement of a Judgment was not filed with the Court until January 3, 2011; our contractual lien exceeds the settlement amount; our equitable charging lien on any recovery from the Action was created prior to Dobrusin & Thennisch PC's equitable charging lien; in our opinion our claim of lien prevails over any and all other claims of lien in the Action. Therefore, we hereby demand that the settlement advance of one hundred thousand dollars (\$100,000) be paid to our firm in partial satisfaction of our claims of lien and the balance of our claims of lien be paid by way of a partial written assignment of royalties due and payable after recoupment of the settlement advance pursuant to the settlement agreement emailed to us yesterday or any long form settlement agreement subsequently entered into by the parties..

If you would like to discuss this letter with me please email or call me.

Yours truly,

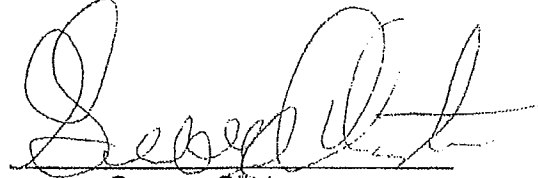
ALLAN-LAW GROUP P.C.

  
Robert J. Allan

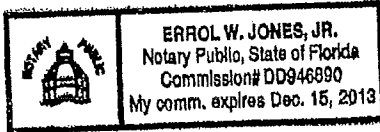
RJA:sm  
Enclosures

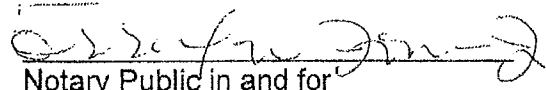
IN WITNESS WHEREOF, I agree and consent to the above assignment and have hereunto signed my name on the date, month and year set forth below,

Dated: November 30, 2010

  
George Clinton

SUBSCRIBED AND SWORN TO before me on November 30<sup>th</sup> 2010.



  
Notary Public in and for  
The State of California Florida

My Commission  
Expires: Dec. 15, 2013

## ASSIGNMENT OF MONIES

This assignment is entered into with reference to the following facts:

i) George Clinton has retained Allan Law Group, P.C. ("ALGPC") to file a lawsuit against a number of entities and individuals including, but not limited to, members of the musical group The Black-Eyed Peas ("BEP") for infringement of the copyright ownership interest of George Clinton in the master sound recording of (Not Just) Knee Deep, a/k/a Knee Deep (the "BEP Case");

ii) George Clinton has retained ALGPC to handle Mr. Clinton's general business and legal affairs ("GBA Representation");

iii) George Clinton has retained ALGPC to represent him and act as his attorneys of record in the case entitled Wlodinguer & Erk, CPA'S PLLC, as successor-in-interest to Wlodinguer, Erk & Chanzis, CPA'S, PLLC v. George Clinton, Case Number 10 Civ. 4394 (SHS) (AJP), filed in the United States District Court, Southern District of New York, filed on September 15, 2010 ("Erk Case");

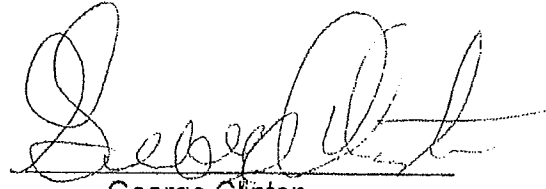
iv) Mr. Clinton has retained ALGPC to investigate the factual and legal background and basis for the claims in and assist counsel of record in a lawsuit entitled George Clinton v. Universal Music Group, Inc. and UMG Recordings, Inc., case number CV 07-00672 PSG (JWJx), filed in the United States District Court, Central District of California, filed January 29, 2007 ("UMG Case"); and

v) ALGPC is entitled to be paid legal fees from George Clinton for legal services rendered or to be rendered and is further entitled to be reimbursed by George Clinton for ALGPC's out of pocket costs and expenses incurred or to be incurred by ALGPC in connection with providing legal services to George Clinton in GBA Representation, in the Erk Case, and in the UMG Case.

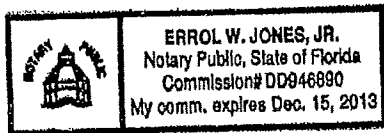
In consideration for ALGPC providing me with legal services for GBA Representation and in the Erk Case and the UMG Case as described in sections ii, iii, and iv above, I, George Clinton, hereby agree to irrevocably assign any and all money due to me based on the claim(s) made by me in the BEP Action, including, but not limited to, any money, or other valuable consideration, paid in partial or complete settlement of the claim(s) in the BEP Action, or in partial or complete satisfaction of any judgment in the BEP Action, and any money from any post trial collection activities arising from, or related to, any judgment in the BEP Action, to ALGPC up to the total amount of the any and all legal fees and costs due and payable by me to ALGPC for legal fees and costs effective as of the date of the payment of any money, or other valuable consideration paid in partial or complete settlement of the claim(s) in the BEP Action or in partial or complete satisfaction of any judgment in the BEP Action ("BEP Money"). The net amount of any and all BEP Money after payment to ALGPC for legal fees and costs will be payable to George Clinton or his nominee or assignee.

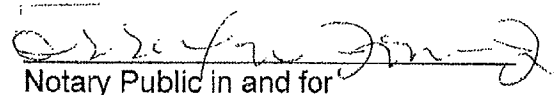
IN WITNESS WHEREOF, I agree and consent to the above assignment and have hereunto signed my name on the date, month and year set forth below,

Dated: November 30, 2010

  
George Clinton

SUBSCRIBED AND SWORN TO before me on November 30<sup>th</sup>, 2010.



  
Notary Public in and for  
The State of California Florida

My Commission  
Expires: Dec. 15, 2013



# State of California

Secretary of State

I, **Debra Bowen**, Secretary of State of the State of California, hereby certify:

That the attached transcript of 2 page(s) was prepared by and in this office from the record on file, of which it purports to be a copy, and that it is full, true and correct.



**IN WITNESS WHEREOF**, I execute this certificate and affix the Great Seal of the State of California this day of

June 01, 2012

---

*Debra Bowen*

Secretary of State

FILE # 107252964329

# UCC FINANCING STATEMENT

FOLLOW INSTRUCTIONS (front and back) CAREFULLY

**A. NAME & PHONE OF CONTACT AT FILER [optional]**  
 (310) 456-3024

**B. SEND ACKNOWLEDGMENT TO: (Name and Address)**  
 Allan Law Group, P.C.  
 22917 Pacific Coast Hwy  
 Suite 350  
 Malibu, CA 90265  
 USA

DOCUMENT NUMBER: 27122120002  
 FILING NUMBER: 10-7252964329  
 FILING DATE: 12/01/2010 13:12  
 IMAGE GENERATED ELECTRONICALLY FOR WEB FILING  
 THE ABOVE SPACE IS FOR CA FILING OFFICE USE ONLY

**1. DEBTOR'S EXACT FULL LEGAL NAME - Insert only one debtor name (1a or 1b) - do not abbreviate or combine names**

1a. ORGANIZATION'S NAME				
OR				
1b. INDIVIDUAL'S LAST NAME Clinton		FIRST NAME George	MIDDLE NAME	SUFFIX
1c. MAILING ADDRESS 1300 Hendrix Road		CITY Tallahassee	STATE FL	POSTAL CODE 32301
1d. SEE INSTRUCTIONS		ADD'L DEBTOR INFO	1e. TYPE OF ORGANIZATION	1f. JURISDICTION OF ORGANIZATION
				1g. ORGANIZATIONAL ID#, if any NONE

**2. ADDITIONAL DEBTOR'S EXACT FULL LEGAL NAME - Insert only one debtor name (2a or 2b) - do not abbreviate or combine names**

2a. ORGANIZATION'S NAME				
OR				
2b. INDIVIDUAL'S LAST NAME		FIRST NAME	MIDDLE NAME	SUFFIX
2c. MAILING ADDRESS		CITY	STATE	POSTAL CODE
				COUNTRY
2d. SEE INSTRUCTIONS		ADD'L DEBTOR INFO	2e. TYPE OF ORGANIZATION	2f. JURISDICTION OF ORGANIZATION
				2g. ORGANIZATIONAL ID#, if any NONE

**3. SECURED PARTY'S NAME (or NAME of TOTAL ASSIGNEE of ASSIGNOR S/P) - Insert only one secured party name (3a or 3b)**

3a. ORGANIZATION'S NAME Allan Law Group, P.C.				
OR				
3b. INDIVIDUAL'S LAST NAME		FIRST NAME	MIDDLE NAME	SUFFIX
3c. MAILING ADDRESS 22917 Pacific Coast Hwy, Suite 350		CITY Malibu	STATE CA	POSTAL CODE 90265
				COUNTRY USA

**4. This FINANCING STATEMENT covers the following collateral:**  
 George Clinton's "chase in action" or claims against members of the musical group The Black Eyed Peas and others for the unauthorized use of Mr. Clinton's master sound recording(s) of (Not Just) Knee Deep, a/k/a Knee Deep (the "BEP Action") and any and all proceeds arising from the BEP Action by way of settlement or satisfaction of judgment to the extent necessary to pay the lien of Allan Law Group, PC ("ALGPC") for fees and costs incurred by ALGPC on behalf of Mr. Clinton for i) general business representation, ii) representation in the case entitled Wlodinger & Erk, CPAs, PLLC v. George Clinton, case number 10 Civ. 4394 (SYS)(AJP), filed in the United States District Court, Southern District of New York, and iii) for legal work relating to the case entitled George Clinton v. Universal Music Group, Inc. and UMG Recordings, Inc., case number CV 07-00672 P SG (JWlx), filed in the United States District Court Central District of California (in aggregate, "Legal Matters"), as of the date sufficient proceeds are paid in the BEP Action for the claims which are the subject of the BEP Action or any related claims or causes of action to pay ALGPC's then outstanding lien for legal

**5. ALT DESIGNATION:**  LESSEE/LESSOR  CONSIGNEE/CONSIGNOR  BAILEE/BAILOR  SELLER/BUYER  AG. LIEN  NON-UCC FILING

6. This FINANCING STATEMENT is to be filed [for record] (or recorded) in the REAL ESTATE RECORDS Attach Addendum [if applicable]

**7. Check to REQUEST SEARCH REPORT(S) on Debtor(s)**  
 [ADDITIONAL FEE] [optional]  All Debtors  Debtor 1  Debtor 2

**8. OPTIONAL FILER REFERENCE DATA**

FILING OFFICE COPY

**UCC FINANCING STATEMENT ADDENDUM**

FOLLOW INSTRUCTIONS (front and back) CAREFULLY

<b>9. NAME OF FIRST DEBTOR (1a or 1b) ON RELATED FINANCING STATEMENT</b>					
9a. ORGANIZATION'S NAME					
OR	9b. INDIVIDUAL'S LAST NAME Clinton	FIRST NAME George	MIDDLE NAME, SUFFIX		
10. MISCELLANEOUS:					
DOCUMENT NUMBER: 27122120002 IMAGE GENERATED ELECTRONICALLY FOR WEB FILING THE ABOVE SPACE IS FOR CA FILING OFFICE USE ONLY					
<b>11. ADDITIONAL DEBTOR'S EXACT FULL LEGAL NAME - Insert only one debtor name (1a or 1b) - do not abbreviate or combine names</b>					
11a. ORGANIZATION'S NAME					
OR	11b. INDIVIDUAL'S LAST NAME		FIRST NAME	MIDDLE NAME	SUFFIX
11c. MAILING ADDRESS			CITY	STATE	POSTAL CODE COUNTRY
11d. SEE INSTRUCTIONS	ADD'L DEBTOR INFO	11e. TYPE OF ORGANIZATION	11f. JURISDICTION OF ORGANIZATION	11g. ORGANIZATIONAL ID#, if any <input type="checkbox"/> NONE	
<b>12. ADDITIONAL SECURED PARTY'S or ASSIGNOR S/P'S NAME - Insert only one name (12a or 12b)</b>					
12a. ORGANIZATION'S NAME					
OR	12b. INDIVIDUAL'S LAST NAME		FIRST NAME	MIDDLE NAME	SUFFIX
12c. MAILING ADDRESS			CITY	STATE	POSTAL CODE COUNTRY
13. This FINANCING STATEMENT covers <input type="checkbox"/> timber to be cut or <input type="checkbox"/> as-extracted collateral, or is filed as a <input type="checkbox"/> fixture filing.			16. Additional collateral description: fees and costs in the Legal Matters.		
14. Description of real estate:			17. Check <u>only</u> if applicable and check <u>only</u> one box. Debtor is a <input type="checkbox"/> Trust or <input type="checkbox"/> Trustee acting with respect to property held in trust or <input type="checkbox"/> Decedent's Estate		
15. Name and address of RECORD OWNER of above-described real estate (If Debtor does not have a record interest):			18. Check <u>only</u> if applicable and check <u>only</u> one box. <input type="checkbox"/> Debtor is a TRANSMITTING UTILITY <input type="checkbox"/> Filed in connection with a Manufactured-Home Transaction - effective 30 years <input type="checkbox"/> Filed in connection with a Public-Finance Transaction - effective 30 years		

FILING OFFICE COPY

**EXHIBIT I**

CLOSED, DISCOVERY, MANADR

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
(Western Division - Los Angeles)  
CIVIL DOCKET FOR CASE #: 2:10-cv-09476-ODW -PLA**

George Clinton v. Will Adams et al  
Assigned to: Judge Otis D Wright, II  
Referred to: Magistrate Judge Paul L. Abrams  
Demand: \$150,000  
Cause: 17:101 Copyright Infringement

Date Filed: 12/10/2010  
Date Terminated: 06/07/2012  
Jury Demand: Both  
Nature of Suit: 820 Copyright  
Jurisdiction: Federal Question

**Plaintiff**

**George Clinton**  
*an individual*

represented by **Jeffrey P Thennisch**  
Dobrusin & Thennisch PC  
29 West Lawrence Street Suite 210  
Pontiac, MI 48342  
248-292-2920  
Fax: 248-292-2910  
Email: jeff@patentco.com  
*PRO HAC VICE*  
*ATTORNEY TO BE NOTICED*

**Larry Haakon Clough**  
Larry Haakon Clough Law Offices  
21757 Devonshire Street Suite 2  
Chatsworth, CA 91311  
818-709-8388  
Fax: 818-709-8372  
Email: lhclough@sbcglobal.net  
*ATTORNEY TO BE NOTICED*

**Robert J Allan**  
Alan Law Group PC  
22631 Pacific Coast Highway, #388  
Malibu, CA 90265  
310-456-3024  
Fax: 310-317-0484  
Email: allan@rjallanlaw.com  
*TERMINATED: 07/20/2011*  
*ATTORNEY TO BE NOTICED*

**Rodney Alan Rummelsburg**  
Allan Law Group PC  
22917 Pacific Coast Highway Suite 350  
Malibu, CA 90265  
310-456-3024  
Fax: 310-317-0484  
Email:  
Rod.Rummelsburg@roadrunner.com  
*TERMINATED: 07/20/2011*  
*ATTORNEY TO BE NOTICED*

V.

**Defendant**

**Will Adams**  
*an individual, p.k.a. will.i.am,*  
*individually*  
*doing business as*  
Will I Am Music Publishing

represented by **Allen B Grodsky**  
Grodsky & Olecki LLP  
2001 Wilshire Boulevard Suite 210  
Santa Monica, CA 90403  
310-315-3009  
Fax: 310-315-1557  
Email: allen@grodsky-olecki.com  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Jonathan S Pink**  
Bryan Cave LLP  
3161 Michelson Dr Suite 1500  
Irvine, CA 92612-4414  
949-223-7000  
Fax: 949-223-7100  
Email: jonathan.pink@bryancave.com  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Alec W Farr**  
Bryan Cave LLP  
1155 F Street NW  
Washington, DC 20004  
202-508-6000  
Fax: 202-508-6200  
Email: awfarr@bryancave.com  
*PRO HAC VICE*  
*ATTORNEY TO BE NOTICED*

**Kara E F Cenar**

Bryan Cave LLP  
161 North Clark Street Suite 4300  
Chicago, IL 60601  
312-602-5000  
Fax: 312-602-5050  
Email: kara.cenar@bryancave.com  
*TERMINATED: 09/15/2011*  
*PRO HAC VICE*  
*ATTORNEY TO BE NOTICED*

**Mariangela Seale**  
Bryan Cave LLP  
161 North Clark Street Suite 4300  
Chicago, Il 60601  
312-602-5000  
Fax: 312-602-5050  
Email: merili.seale@bryancave.com  
*PRO HAC VICE*  
*ATTORNEY TO BE NOTICED*

**Defendant**

**Allan Pineda**  
*an indiviual, p.k.a. apl.de.ap,*  
*individually*  
*doing business as*  
Jeepen Music Publishing

represented by **Allen B Grodsky**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Jonathan S Pink**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Alec W Farr**  
(See above for address)  
*PRO HAC VICE*  
*ATTORNEY TO BE NOTICED*

**Kara E F Cenar**  
(See above for address)  
*TERMINATED: 09/14/2011*  
*PRO HAC VICE*  
*ATTORNEY TO BE NOTICED*

**Mariangela Seale**  
(See above for address)  
*PRO HAC VICE*

*ATTORNEY TO BE NOTICED*

**Defendant**

**Jaime Gomez**

*an individual, p.k.a. Taboo, individually  
doing business as  
Nawasha Networks Publishing*

represented by **Allen B Grodsky**

(See above for address)

*LEAD ATTORNEY*

*ATTORNEY TO BE NOTICED*

**Jonathan S Pink**

(See above for address)

*LEAD ATTORNEY*

*ATTORNEY TO BE NOTICED*

**Alec W Farr**

(See above for address)

*PRO HAC VICE*

*ATTORNEY TO BE NOTICED*

**Kara E F Cenar**

(See above for address)

*TERMINATED: 09/22/2011*

*PRO HAC VICE*

*ATTORNEY TO BE NOTICED*

**Mariangela Seale**

(See above for address)

*PRO HAC VICE*

*ATTORNEY TO BE NOTICED*

**Defendant**

**Stacy Ferguson**

*an individual, p.k.a Fergie*

represented by **Allen B Grodsky**

(See above for address)

*LEAD ATTORNEY*

*ATTORNEY TO BE NOTICED*

**Jonathan S Pink**

(See above for address)

*LEAD ATTORNEY*

*ATTORNEY TO BE NOTICED*

**Alec W Farr**

(See above for address)

*PRO HAC VICE*

*ATTORNEY TO BE NOTICED*



**Kara E F Cenar**

(See above for address)

*TERMINATED: 09/15/2011*

*PRO HAC VICE*

*ATTORNEY TO BE NOTICED*

**Mariangela Seale**

(See above for address)

*PRO HAC VICE*

*ATTORNEY TO BE NOTICED*

**Defendant**

**George Pajon, Jr.**

*an individual*

*TERMINATED: 01/04/2012*

represented by **Jonathan S Pink**

(See above for address)

*LEAD ATTORNEY*

*ATTORNEY TO BE NOTICED*

**Alec W Farr**

(See above for address)

*PRO HAC VICE*

*ATTORNEY TO BE NOTICED*

**Kara E F Cenar**

(See above for address)

*PRO HAC VICE*

*ATTORNEY TO BE NOTICED*

**Mariangela Seale**

(See above for address)

*PRO HAC VICE*

*ATTORNEY TO BE NOTICED*

**Defendant**

**John Curtis**

*an individual*

**Defendant**

**Universal Music Group, Inc.**

*a Delaware corporation*

represented by **Linda M Burrow**

Caldwell Leslie and Proctor PC  
1000 Wilshire Boulevard Suite 600

Los Angeles, CA 90017

213-629-9040

Fax: 213-629-9022

Email: burrow@caldwell-leslie.com

*LEAD ATTORNEY*

*ATTORNEY TO BE NOTICED*

**Heather L Pearson**

Writers Guild of America West, Inc.

7000 W. Third St.

Los Angeles, CA 90048

323.782.4521

Fax: 323.782.4806

Email: [hpearson@wga.org](mailto:hpearson@wga.org)

*TERMINATED: 08/02/2011*

**Defendant**

**UMG Recordings, Inc.**

*a Delaware corporation*

represented by **Linda M Burrow**

(See above for address)

*LEAD ATTORNEY*

*ATTORNEY TO BE NOTICED*

**Heather L Pearson**

(See above for address)

*TERMINATED: 08/02/2011*

**Defendant**

**Will I Am Music, Inc.**

*a California corporation*

represented by **Allen B Grodsky**

(See above for address)

*LEAD ATTORNEY*

*ATTORNEY TO BE NOTICED*

**Jonathan S Pink**

(See above for address)

*LEAD ATTORNEY*

*ATTORNEY TO BE NOTICED*

**Alec W Farr**

(See above for address)

*PRO HAC VICE*

*ATTORNEY TO BE NOTICED*

**Kara E F Cengar**

(See above for address)

*TERMINATED: 09/15/2011*

*PRO HAC VICE*

*ATTORNEY TO BE NOTICED*

**Mariangela Seale**

(See above for address)

*PRO HAC VICE*  
*ATTORNEY TO BE NOTICED*

**Defendant**

**Cherry Land Music Publishing  
Company, Inc.**  
*a New York corporation*  
*TERMINATED: 01/04/2012*

represented by **Allen B Grodsky**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Jonathan S Pink**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Alec W Farr**  
(See above for address)  
*PRO HAC VICE*  
*ATTORNEY TO BE NOTICED*

**Kara E F Cenar**  
(See above for address)  
*TERMINATED: 09/21/2011*  
*PRO HAC VICE*  
*ATTORNEY TO BE NOTICED*

**Mariangela Seale**  
(See above for address)  
*PRO HAC VICE*  
*ATTORNEY TO BE NOTICED*

**Defendant**

**El Cubano Music, Inc.**  
*a California corporation*  
*TERMINATED: 01/04/2012*

represented by **Jonathan S Pink**  
(See above for address)  
*ATTORNEY TO BE NOTICED*

**Defendant**

**Emi Blackwood Music Inc.**  
*a Connecticut corporation*  
*TERMINATED: 01/04/2012*

represented by **Jonathan S Pink**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Alec W Farr**  
(See above for address)  
*PRO HAC VICE*  
*ATTORNEY TO BE NOTICED*

**Kara E F Cenar**  
(See above for address)  
*PRO HAC VICE*  
*ATTORNEY TO BE NOTICED*

**Mariangela Seale**  
(See above for address)  
*PRO HAC VICE*  
*ATTORNEY TO BE NOTICED*

**Defendant**

**Tab Magnetic, Inc.**  
*a California corporation*

represented by **Allen B Grodsky**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Jonathan S Pink**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Alec W Farr**  
(See above for address)  
*PRO HAC VICE*  
*ATTORNEY TO BE NOTICED*

**Kara E F Cenar**  
(See above for address)  
*PRO HAC VICE*  
*ATTORNEY TO BE NOTICED*

**Mariangela Seale**  
(See above for address)  
*PRO HAC VICE*  
*ATTORNEY TO BE NOTICED*

**Defendant**

**Does**  
*1 through 10*

**Creditor**

**Hendricks & Lewis PLLC**  
*Lien Holder*

represented by **Mary H Haas**  
Davis Wright Tremaine LLP  
865 South Figueroa Street Suite 2400

Los Angeles, CA 90017-2566  
 213-633-6800  
 Fax: 213-633-6899  
 Email: maryhaas@dwt.com  
*ATTORNEY TO BE NOTICED*

V.

**Mediator (ADR Panel)**

**Gail Killefer**

United States District Court  
 312 N. Spring Street  
 Los Angeles, CA 90012

<b>Date Filed</b>	<b>#</b>	<b>Docket Text</b>
12/10/2010	<u>1</u>	COMPLAINT against Defendants Will Adams, Cherry Land Music Publishing Company, Inc., John Curtis, Does 1 through 10, El Cubano Music, Inc., Emi Blackwood Music Inc., Stacy Ferguson, Jaime Gomez, George Pajon, Jr, Allan Pineda, Tab Magnetic, Inc., UMG Recordings, Inc., Universal Music Group, Inc., Will I Am Music, Inc. Case assigned to Judge Otis D Wright, II for all further proceedings. Discovery referred to Magistrate Judge Paul L. Abrams. (Filing fee \$ 350: PAID) Jury Demanded., filed by plaintiff George Clinton. (ghap) (ds). (Entered: 12/14/2010)
12/10/2010		21 DAY Summons Issued re Complaint - (Discovery) <u>1</u> as to Defendants Will Adams, Cherry Land Music Publishing Company, Inc., John Curtis, Does 1 through 10, El Cubano Music, Inc., Emi Blackwood Music Inc., Stacy Ferguson, Jaime Gomez, George Pajon, Jr, Allan Pineda, Tab Magnetic, Inc., UMG Recordings, Inc., Universal Music Group, Inc., Will I Am Music, Inc. (ghap) (Entered: 12/14/2010)
12/10/2010	<u>2</u>	CERTIFICATION AND NOTICE of Interested Parties filed by Plaintiff George Clinton. (ghap) (ds). (Entered: 12/14/2010)
12/10/2010	<u>3</u>	NOTICE TO COUNSEL RE: Copyright, Patent and Trademark Reporting Requirements. Counsel shall file the appropriate AO-120 and/or AO-121 form with the Clerk within 10 days. (Attachments: # <u>1</u> AO-121) (ghap) (Entered: 12/14/2010)
12/10/2010	<u>4</u>	NOTICE TO PARTIES OF ADR PROGRAM filed.(ghap) (Entered: 12/14/2010)
12/16/2010	<u>5</u>	REPORT ON THE FILING OF AN ACTION regarding a copyright (Initial Notification) filed by George Clinton. (Rummelsburg, Rodney) (Entered: 12/16/2010)

12/17/2010	<u>6</u>	SUPPLEMENT to Report on Filing of Copyright Action (Initial Notification) <u>5</u> filed by Plaintiff George Clinton. (Rummelsburg, Rodney) (Entered: 12/17/2010)
12/27/2010	<u>7</u>	STANDING ORDER REGARDING NEWLY ASSIGNED CASES by Judge Otis D Wright II. Read This Order Carefully. It Controls This Case and Differs in Some Respects From the Local Rules. (See Order for Details). (sch) (Entered: 12/28/2010)
01/03/2011	<u>8</u>	STIPULATION for Extension of Time to File Answer to March 4, 2011 filed by Defendants Will Adams, Stacy Ferguson, Jaime Gomez, Allan Pineda. (Attachments: # <u>1</u> Proposed Order)(Pink, Jonathan) (Entered: 01/03/2011)
01/03/2011	<u>9</u>	NOTICE OF LIEN filed by Judgment creditor Hendricks & Lewis PLLC. (lc) (lc). (Entered: 01/04/2011)
01/04/2011	<u>10</u>	ORDER Extending Deadline for Defendants' to File a Response to Plaintiff's Complaint by Sixty Days Pursuant to Local Rules 7-1 and 8-3, <u>8</u> by Judge Otis D Wright II. Defendants Will Adams answer due 3/4/2011; Stacy Ferguson answer due 3/4/2011; Jaime Gomez answer due 3/4/2011; Allan Pineda answer due 3/4/2011. (No Further Extensions Will be Granted). (sch) (Entered: 01/04/2011)
01/05/2011	<u>11</u>	STIPULATION for Extension of Time to File Answer to March 4, 2011 filed by Defendants Will Adams, Cherry Land Music Publishing Company, Inc., Stacy Ferguson, Jaime Gomez, Allan Pineda, Tab Magnetic, Inc., Will I Am Music, Inc.. (Attachments: # <u>1</u> Proposed Order)(Pink, Jonathan) (Entered: 01/05/2011)
01/06/2011	<u>12</u>	ORDER EXTENDING Deadline For Defendants' To File a Response to Plaintiff's Complaint by Sixty Days Pursuant to Local Rules 7-1 and 8-3, <u>11</u> by Judge Otis D Wright II. Defendants Will I Am Music, Inc., Tab Magnetic, Inc., and Cherry Land Music Publishing Company, Inc. answer extended to 3/4/2011. (sch) (Entered: 01/06/2011)
01/10/2011	<u>13</u>	STIPULATION for Extension of Time to File Answer to March 4, 2011 filed by Defendants Will Adams, Cherry Land Music Publishing Company, Inc., Emi Blackwood Music Inc., Stacy Ferguson, Jaime Gomez, George Pajon, Jr, Allan Pineda, Tab Magnetic, Inc., Will I Am Music, Inc.. (Attachments: # <u>1</u> Proposed Order)(Pink, Jonathan) (Entered: 01/10/2011)
01/12/2011	<u>14</u>	ORDER granting Stipulation to Extend Time to Answer (More than 30 days) <u>13</u> as to defendants Emi Blackwood Music Inc. answer due 3/4/2011; George Pajon, Jr answer due 3/4/2011 by Judge Otis D Wright, II (lc) (Entered: 01/12/2011)
01/14/2011	<u>15</u>	APPLICATION for attorney Kara E. F. Cenar to Appear Pro Hac Vice (PHV FEE NOT PAID.) filed by Defendants Will Adams, Cherry Land Music Publishing Company, Inc., Emi Blackwood Music Inc., Stacy Ferguson, Jaime Gomez, George Pajon, Jr, Allan Pineda, Tab Magnetic, Inc., Will I Am Music,

		Inc.. (Attachments: # <u>1</u> Proposed Order)(Pink, Jonathan) (Entered: 01/14/2011)
01/17/2011	<u>16</u>	STIPULATION for Extension of Time to File Answer to March 10, 2011 filed by Plaintiff George Clinton. (Attachments: # <u>1</u> Proposed Order)(Rummelsburg, Rodney) (Entered: 01/17/2011)
01/18/2011	<u>17</u>	NOTICE of Appearance filed by attorney Linda M Burrow on behalf of Defendants UMG Recordings, Inc., Universal Music Group, Inc. (Burrow, Linda) (Entered: 01/18/2011)
01/18/2011	<u>18</u>	ORDER Extending Deadline for Defendants' to File a Response to Plaintiff's Complaint by Sixty Days Pursuant to Local Rules 7-1 and 8-3, <u>16</u> by Judge Otis D Wright II. Based on the Parties stipulation thereto, and for good cause shown, this Court hereby Orders that the deadline for Defendants UNIVERSAL MUSIC GROUP, INC. and UMG RECORDINGS, INC. to file a response to Plaintiffs Complaint shall be extended to March 10, 2011. (sch) (Entered: 01/20/2011)
02/24/2011	<u>19</u>	ORDER by Judge Otis D Wright, II: granting <u>15</u> Application to Appear Pro Hac Vice by Attorney Kara E F Cenar on behalf of Defendants, designating Jonathan S. Pink as local counsel. (It) (Entered: 02/25/2011)
03/03/2011	<u>20</u>	PROOF OF SERVICE Executed by Plaintiff George Clinton, upon Defendant John Curtis served on 3/1/2011, answer due 3/22/2011. in compliance with Federal Rules of Civil Procedure by personal service. Original Summons NOT returned. (Rummelsburg, Rodney) (Entered: 03/03/2011)
03/04/2011	<u>21</u>	ANSWER to Complaint - (Discovery), Complaint - (Discovery), Complaint - (Discovery) <u>1</u> with JURY DEMAND filed by Defendants Will Adams, Will I Am Music, Inc..(Pink, Jonathan) (Entered: 03/04/2011)
03/04/2011	<u>22</u>	ANSWER to Complaint - (Discovery), Complaint - (Discovery), Complaint - (Discovery) <u>1</u> filed by Defendant Cherry Land Music Publishing Company, Inc..(Pink, Jonathan) (Entered: 03/04/2011)
03/04/2011	<u>23</u>	ANSWER to Complaint - (Discovery), Complaint - (Discovery), Complaint - (Discovery) <u>1</u> filed by Defendant Emi Blackwood Music Inc..(Pink, Jonathan) (Entered: 03/04/2011)
03/04/2011	<u>24</u>	ANSWER to Complaint - (Discovery), Complaint - (Discovery), Complaint - (Discovery) <u>1</u> filed by Defendant Stacy Ferguson.(Pink, Jonathan) (Entered: 03/04/2011)
03/04/2011	<u>25</u>	ANSWER to Complaint - (Discovery), Complaint - (Discovery), Complaint - (Discovery) <u>1</u> filed by Defendant Jaime Gomez, Tab Magnetic, Inc..(Pink, Jonathan) (Entered: 03/04/2011)
03/04/2011	<u>26</u>	ANSWER to Complaint - (Discovery), Complaint - (Discovery), Complaint - (Discovery) <u>1</u> filed by Defendants El Cubano Music, Inc., George Pajon, Jr.(Pink, Jonathan) (Entered: 03/04/2011)

03/04/2011	<u>27</u>	ANSWER to Complaint - (Discovery), Complaint - (Discovery), Complaint - (Discovery) <u>1</u> filed by Defendant Allan Pineda.(Pink, Jonathan) (Entered: 03/04/2011)
03/07/2011	<u>28</u>	NOTICE TO FILER OF DEFICIENCIES in Electronically Filed Documents RE: Answer to Complaint (Discovery) <u>23</u> , Answer to Complaint (Discovery) <u>22</u> , Answer to Complaint (Discovery) <u>21</u> , Answer to Complaint (Discovery) <u>24</u> , Answer to Complaint (Discovery) <u>25</u> , Answer to Complaint (Discovery) <u>27</u> , Answer to Complaint (Discovery) <u>26</u> by Will Adams, Will I Am Music, Cherry land Music, EMI Blackwood Music, Stacy Ferguson, Jaime Gomez, El Cubano Music and Allen Pineda. The following error(s) was found: Local Rule 7.1-1 No Certification of Interested Parties. In response to this notice the court may order (1) an amended or correct document to be filed (2) the document stricken or (3) take other action as the court deems appropriate. You need not take any action in response to this notice unless and until the court directs you to do so. (lc) (Entered: 03/07/2011)
03/07/2011	<u>29</u>	ORDER SETTING SCHEDULING CONFERENCE by Judge Otis D Wright, II,, Set deadlines( Rule 26 Meeting Report due by 4/11/2011.), Set hearings( Scheduling Conference set for 4/25/2011 01:30 PM before Judge Otis D Wright II.) (rne) (Entered: 03/07/2011)
03/07/2011	<u>30</u>	Notice of Interested Parties filed by Defendants Will Adams, Cherry Land Music Publishing Company, Inc., El Cubano Music, Inc., Emi Blackwood Music Inc., Stacy Ferguson, Jaime Gomez, George Pajon, Jr, Allan Pineda, Tab Magnetic, Inc., Will I Am Music, Inc., (Pink, Jonathan) (Entered: 03/07/2011)
03/10/2011	<u>31</u>	ANSWER to Complaint - (Discovery), Complaint - (Discovery), Complaint - (Discovery) <u>1</u> filed by Defendant UMG Recordings, Inc., Universal Music Group, Inc..(Burrow, Linda) (Entered: 03/10/2011)
03/10/2011	<u>32</u>	CERTIFICATE of Interested Parties filed by Defendant UMG Recordings, Inc., Universal Music Group, Inc., identifying UMG Recordings, Inc. is a Delaware corporation whose parent companies include Universal Music Group, Inc., a Delaware corporation. The ultimate parent of UMG Recordings, Inc. is Vivendi, S.A., a publicly traded French corporation. Universal Music Group, Inc. is a Delaware corporation whose ultimate parent is Vivendi, S.A., a publicly traded French corporation.. (Burrow, Linda) (Entered: 03/10/2011)
04/11/2011	<u>33</u>	FRCP RULE 26(F) JOINT REPORT of Discovery Plan and Proposed Scheduling filed by Plaintiff George Clinton. (Attachments: # <u>1</u> Exhibit Schedule of Pretrial and Trial Dates)(Rummelsburg, Rodney) (Entered: 04/11/2011)
04/12/2011	<u>34</u>	NOTICE TO FILER OF DEFICIENCIES in Electronically Filed Documents RE: Report <u>33</u> . The following error(s) was found: Incorrect event selected. The correct event is: Joint Rule 26(f) Discovery Plan. In response to this notice the court may order (1) an amended or correct document to be filed (2) the



		document stricken or (3) take other action as the court deems appropriate. You need not take any action in response to this notice unless and until the court directs you to do so. (lc) (Entered: 04/12/2011)
04/13/2011	<u>35</u>	ADR Program Questionnaire filed by Plaintiff George Clinton re: Report <u>33</u> (Rummelsburg, Rodney) (Entered: 04/13/2011)
04/13/2011	<u>36</u>	MINUTE ORDER IN CHAMBERS by Judge Otis D Wright, II:The Court is in receipt of the parties Joint Rule 26(f) Report. The Court has reviewed the report and deems a scheduling conference unnecessary. Accordingly, the scheduling conference presently scheduled for April 25, 2011 at 1:30 p.m. is hereby VACATED, and no appearances are necessary. A Scheduling and Case Management Order will issue. (lc) (Entered: 04/14/2011)
04/14/2011	<u>37</u>	NOTICE TO FILER OF DEFICIENCIES in Electronically Filed Documents RE: plaintiffs Miscellaneous Document <u>35</u> . The following error(s) was found: Incorrect event selected. The correct event is: ADR Program Questionnaire (ADR-9). In response to this notice the court may order (1) an amended or correct document to be filed (2) the document stricken or (3) take other action as the court deems appropriate. You need not take any action in response to this notice unless and until the court directs you to do so. (lc) (Entered: 04/14/2011)
04/29/2011	<u>38</u>	SCHEDULING AND CASE MANAGEMENT ORDER by Judge Otis D Wright II: Jury trial: 5/1/12 9:00 AM; File final trial exhibit stipulation: 4/26/12; hearing on motions in limine: 4/23/12 2:30 PM; Pretrial Conference: 4/9/12 2:30 PM; motions in limine, proposed voir dire questions and proposed voir dire questions and agreed to statement of case: 4/9/12; lodged Pretrial conference order and pretrial exhibit stipulation, file contentions of fact and law, exhibit and witness lists, status report regarding settlement, agreed upon set of instructions and verdict forms, joint statement regarding disputed instructions verdicts etc: 4/2/12; last date to conduct settlement conference: 3/5/12;last day for hearing motions: 3/12/12 1:30 PM; discovery cutoff: 1/30/12; last date to amend pleadings or add parties: 7/18/11. (lc) Modified on 5/3/2011 (rne) corrected motions in limine hrg time. (Entered: 05/02/2011)
05/19/2011	<u>39</u>	APPLICATION for attorney Mariangela M. Seale to Appear Pro Hac Vice (PHV FEE NOT PAID.) filed by Defendants Will Adams, Cherry Land Music Publishing Company, Inc., Emi Blackwood Music Inc., Stacy Ferguson, Jaime Gomez, George Pajon, Jr, Allan Pineda, Tab Magnetic, Inc., Will I Am Music, Inc.. (Attachments: # <u>1</u> Proposed Order)(Pink, Jonathan) (Entered: 05/19/2011)
05/20/2011	<u>40</u>	ORDER by Judge Otis D Wright, II: granting <u>39</u> Application to Appear Pro Hac Vice by Attorney Mariangela M. Seale on behalf of Will Adams, Allan Pineda, Jaime Gomez, Stacy Ferguson, Will.I.Am Music, Inc., Cherry Lane Music Publishing Co., Tab Magnetic, George Pajon, Jr., EMI blackwood Music, designating Jonathan S. Pink as local counsel. (lt) (Entered: 05/24/2011)

07/14/2011	<u>41</u>	APPLICATION for attorney Alec W. Farr to Appear Pro Hac Vice (PHV FEE NOT PAID.) filed by Defendants Will Adams, Emi Blackwood Music Inc., Stacy Ferguson, Jaime Gomez, George Pajon, Jr, Allan Pineda, Tab Magnetic, Inc., Will I Am Music, Inc.. (Attachments: # <u>1</u> Proposed Order)(Pink, Jonathan) (Entered: 07/14/2011)
07/15/2011	<u>42</u>	ORDER by Judge Otis D Wright, II: granting <u>41</u> Application to Appear Pro Hac Vice by Attorney Alec W. Farr on behalf of Defendants Will Adams, Cherry Land Music Publishing Company, Inc., EMI Blackwood Music Inc., Stacy Ferguson, Jaime Gomez, George Pajon, Jr, Allan Pineda, Tab Magnetic, Inc. and will.i.am music, inc., designating Jonathan S. Pink as local counsel. (vh) (Entered: 07/18/2011)
07/19/2011	<u>43</u>	NOTICE OF LIEN filed by Former Attorney for Plaintiff George Clinton. (Rummelsburg, Rodney) (Entered: 07/19/2011)
07/19/2011	<u>44</u>	First REQUEST to Substitute attorney Larry Haakon Clough in place of attorney Robert J. Allan; Rod Rummelsburg; Justin Sobodash filed by Plaintiff George Clinton. (Rummelsburg, Rodney) (Entered: 07/19/2011)
07/20/2011	<u>45</u>	NOTICE TO FILER OF DEFICIENCIES in Electronically Filed Documents RE: First REQUEST to Substitute attorney Larry Haakon Clough in place of attorney Robert J. Allan; Rod Rummelsburg; Justin Sobodash <u>44</u> . The following error(s) was found: Missing Proposed order which should have been submitted as a separate attachment. (form available on courts website).In response to this notice the court may order (1) an amended or correct document to be filed (2) the document stricken or (3) take other action as the court deems appropriate. You need not take any action in response to this notice unless and until the court directs you to do so. (lc) (Entered: 07/20/2011)
07/20/2011	<u>46</u>	REQUEST to Substitute attorney Larry Haakon Clough in place of attorney Robert J. Allan, Rod Rummelsburg, Justin Sobodash filed by Plaintiff George Clinton. (Attachments: # <u>1</u> Proposed Order)(Rummelsburg, Rodney) (Entered: 07/20/2011)
07/20/2011	<u>47</u>	ORDER by Judge Otis D Wright, II: Request to Substitute Attorney Larry Haakon Clough for George Clinton in place and stead of Attorneys Robert J Allan and Rodney Alan Rummelsburg <u>44</u> <u>46</u> GRANTED. (ir) (Entered: 07/21/2011)
08/01/2011	<u>48</u>	APPLICATION for attorney Jeffrey P. Thennisch to Appear Pro Hac Vice(PHV Fee of \$275 receipt number 0973-9016658 paid.) filed by Plaintiff George Clinton. (Attachments: # <u>1</u> Proposed Order, # <u>2</u> Exhibit Certificate of Good Standing)(Thennisch, Jeffrey) (Entered: 08/01/2011)
08/02/2011	<u>49</u>	NOTICE of Change of Attorney Information for attorney Linda M Burrow counsel for Defendants UMG Recordings, Inc., Universal Music Group, Inc..Heather Pearson is no longer attorney of record for the aforementioned party in this case for the reason indicated in the G-06 Notice. Filed by defendant

		UMG RECORDINGS, INC. (Burrow, Linda) (Entered: 08/02/2011)
08/02/2011	<u>50</u>	PROOF OF SERVICE filed by defendant UMG Recordings, Inc., Universal Music Group, Inc., re Notice of Change of Attorney Information (G-06), Notice of Change of Attorney Information (G-06) <u>49</u> served on August 2, 2011. (Burrow, Linda) (Entered: 08/02/2011)
08/02/2011	<u>51</u>	ORDER by Judge Otis D Wright, II: granting <u>48</u> Application to Appear Pro Hac Vice by Attorney Jeffrey P. Thennisch on behalf of Plaintiff, designating Larry Haakon Clough as local counsel. (lt) (Entered: 08/03/2011)
09/13/2011	<u>52</u>	REQUEST to Substitute attorney Allen B. Grodsky in place of attorney Kara E. F. Cengar filed by Defendant Allan Pineda. (Attachments: # <u>1</u> Proposed Order on Request for Approval on Substitution of Attorney)(Grodsky, Allen) (Entered: 09/13/2011)
09/14/2011	<u>53</u>	ORDER by Judge Otis D Wright, II: granting <u>52</u> Defendant Allan Pineda's Request to Substitute Attorney Allen B. Grodsky of Grodsky & Olecki LLP as attorney of record in place and stead of Attorney Kara E F Cengar. (lom) (Entered: 09/14/2011)
09/15/2011	<u>54</u>	REQUEST to Substitute attorney Allen B. Grodsky in place of attorney Kara E.F. Cengar filed by Defendant Will Adams. (Attachments: # <u>1</u> Proposed Order on Request for Approval of Substitution of Attorney)(Grodsky, Allen) (Entered: 09/15/2011)
09/15/2011	<u>55</u>	REQUEST to Substitute attorney Allen B. Grodsky in place of attorney Kara E.F. Cengar filed by Defendant Stacy Ferguson. (Attachments: # <u>1</u> Proposed Order on Request for Approval of Substitution of Attorney)(Grodsky, Allen) (Entered: 09/15/2011)
09/15/2011	<u>56</u>	REQUEST to Substitute attorney Allen B. Grodsky in place of attorney Kara E.F. Cengar filed by Defendant Will I Am Music, Inc.. (Attachments: # <u>1</u> Proposed Order on Request for Approval of Substitution of Attorney)(Grodsky, Allen) (Entered: 09/15/2011)
09/15/2011	<u>57</u>	ORDER by Judge Otis D Wright, II: granting <u>54</u> defendant Will Adams Request to Substitute Attorney Allen B. Grodsky in place and instead of Kara E.F.Cengar. (lc) (Entered: 09/16/2011)
09/15/2011	<u>58</u>	ORDER by Judge Otis D Wright, II: granting <u>55</u> defendant Stacy Ferguson Request to Substitute Attorney Allen B. Grodsky in place and instead of Kara E.F.Cengar. (lc) (Entered: 09/16/2011)
09/15/2011	<u>59</u>	ORDER by Judge Otis D Wright, II: granting <u>56</u> defendant will.i.am.music, inc. Request to Substitute Attorney Allen B. Grodsky in place and instead of Kara E.F.Cengar. (lc) (Entered: 09/16/2011)
09/19/2011	<u>60</u>	REQUEST to Substitute attorney Allen B. Grodsky in place of attorney Kara E.F. Cengar filed by Defendant Cherry Land Music Publishing Company, Inc..

		(Attachments: # <u>1</u> Proposed Order on Request for Approval of Substitution of Attorney)(Grodsky, Allen) (Entered: 09/19/2011)
09/21/2011	<u>61</u>	ORDER by Judge Otis D Wright, II: granting <u>60</u> Cherry Lane Music Publishing Co. Request to Substitute Attorney Allen B Grodsky instead and in place of Kara E F Cengar. (lc) Modified on 9/21/2011 (lc). (Entered: 09/21/2011)
09/21/2011	<u>62</u>	REQUEST to Substitute attorney Allen B. Grodsky in place of attorney Kara E.F. Cengar filed by Defendant Jaime Gomez. (Attachments: # <u>1</u> Proposed Order on Request for Approval of Substitution of Attorney)(Grodsky, Allen) (Entered: 09/21/2011)
09/22/2011	<u>63</u>	ORDER by Judge Otis D Wright, II: granting <u>62</u> Request to Substitute Attorney Allen B Brodsky in place and instead of Kara E F Cengar. (lc) (Entered: 09/22/2011)
09/28/2011	<u>64</u>	STIPULATION for Order for voluntary stay of discovery between certain parties filed by Plaintiff George Clinton. (Attachments: # <u>1</u> Proposed Order) (Thennisch, Jeffrey) (Entered: 09/28/2011)
09/28/2011	<u>65</u>	ORDER GRANTING STIPULATED REQUEST FOR VOLUNTARY STAY OF DISCOVERY BETWEEN CERTAIN PARTIES UNTIL OCTOBER 31, 2011 <u>64</u> by Judge Otis D Wright, II, (lc) Modified on 9/29/2011 (lc). (Entered: 09/29/2011)
10/20/2011	<u>66</u>	REQUEST to Substitute attorney Allen B. Grodsky in place of attorney Kara E.F. Cengar filed by Defendant Tab Magnetic, Inc.. (Attachments: # <u>1</u> Proposed Order on Request for Approval of Substitution of Attorney)(Grodsky, Allen) (Entered: 10/20/2011)
10/20/2011	<u>67</u>	ORDER by Judge Otis D Wright, II: granting <u>66</u> Request to Substitute Attorney Allen B Grodsky in place and instead of Kara E F Cengar as to defendant Will Adams. (lc) (Entered: 10/21/2011)
11/30/2011	<u>68</u>	STIPULATION to AMEND Scheduling Order, Set/Reset Deadlines/Hearings,,,,, <u>38</u> filed by Defendant Will Adams. (Attachments: # <u>1</u> Proposed Order granting Stipulation)(Grodsky, Allen) (Entered: 11/30/2011)
12/01/2011	<u>69</u>	ORDER GRANTING <u>68</u> STIPULATED REQUEST FOR 30 DAY EXTENSION OF DATES IN SCHEDULING AND CASE MANAGEMENT ORDER AND 30 DAY STAY OF DISCOVERY by Judge Otis D Wright, II : The deadlines and hearings originally scheduled have been rescheduled: Jury Trial set for 6/5/2012 09:00 AM; Last day to file final pretrial ex stip. is 5/25/2012; Hearing on motion in limine : 5/21/2012 2:30 PM; Pretrial Conference set for 5/7/2012 02:30 PM; Proposed Pretrial Order, etc due by 4/30/2012; Last day for hearing on motions: 4/9/2012; Last date to conduct settlement conference is 4/2/2012; Discovery cut-off 2/29/2012; (lc) (Entered: 12/01/2011)

01/04/2012	<u>70</u>	STIPULATION to Dismiss Defendants Cherry Land Music Publishing Company, Inc. filed by Defendant Cherry Land Music Publishing Company, Inc.. (Attachments: # <u>1</u> Proposed Order Dismissing Certain Defendants) (Grotsky, Allen) (Entered: 01/04/2012)
01/04/2012	<u>71</u>	ORDER by Judge Otis D Wright, II, re Stipulation to Dismiss Certain Parties <u>70</u> : (1) The above-captioned action be and hereby is dismissed with prejudice pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure as to defendants George Pajon, Cherry Lane Music Publishing Company, Inc., El Cubano Music, Inc., and EMI Blackwood Music Inc. 2) Plaintiff and the Dismissed Defendants will bear their own attorneys fees and costs. (lc) (Entered: 01/04/2012)
02/16/2012	<u>72</u>	NOTICE OF MOTION AND MOTION for Relief from Deemed Admissions filed by plaintiff George Clinton. Motion set for hearing on 3/26/2012 at 01:30 PM before Judge Otis D Wright II. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B)(Thennisch, Jeffrey) (Entered: 02/16/2012)
03/01/2012	<u>73</u>	MINUTE ORDER (IN CHAMBERS) by Judge Otis D Wright II. The Court refers the Plaintiffs Motion to be Relieved From Deemed Admissions <u>72</u> filed on February 16, 2012 to the Honorable Magistrate Judge Paul L. Abrams. The current hearing date of March 26, 2012 at 1:30 p.m. for this motion shall be calendared before Magistrate Judge. (sch) (Entered: 03/01/2012)
03/02/2012	<u>74</u>	Notice of Withdrawal of Motion for Relief of Discovery Matter <u>72</u> filed by Plaintiff George Clinton. (Thennisch, Jeffrey) (Entered: 03/02/2012)
03/07/2012	<u>75</u>	NOTICE OF MOTION AND MOTION for Partial Summary Judgment filed by Defendant Will Adams. Motion set for hearing on 4/9/2012 at 01:30 PM before Judge Otis D Wright II. (Grotsky, Allen) (Entered: 03/07/2012)
03/07/2012	<u>76</u>	MEMORANDUM in Support of MOTION for Partial Summary Judgment <u>75</u> filed by Defendant Will Adams. (Grotsky, Allen) (Entered: 03/07/2012)
03/07/2012	<u>77</u>	STATEMENT of Uncontroverted Facts MOTION for Partial Summary Judgment <u>75</u> filed by Defendant Will Adams. (Grotsky, Allen) (Entered: 03/07/2012)
03/07/2012	<u>78</u>	DECLARATION of Marshall et al. in support of MOTION for Partial Summary Judgment <u>75</u> filed by Defendant Will Adams. (Attachments: # <u>1</u> Declaration of Craig Marshall, # <u>2</u> Declaration of Deborah Mannis-Gardner, # <u>3</u> Declaration of Rachel Rosoff, # <u>4</u> Declaration of Allen B. Grotsky, # <u>5</u> Exhibit 1, # <u>6</u> Exhibit 2-8, # <u>7</u> Exhibit 9-14)(Grotsky, Allen) (Entered: 03/07/2012)
03/07/2012	<u>79</u>	NOTICE OF LODGING filed re MOTION for Partial Summary Judgment <u>75</u> (Attachments: # <u>1</u> Proposed Order (Statement of Decision))(Grotsky, Allen) (Entered: 03/07/2012)

03/07/2012	<u>80</u>	REQUEST FOR JUDICIAL NOTICE re MOTION for Partial Summary Judgment <u>75</u> filed by Defendant Will Adams. (Attachments: # <u>1</u> Exhibit A)(Grodsky, Allen) (Entered: 03/07/2012)
03/07/2012	<u>81</u>	NOTICE TO FILER OF DEFICIENCIES in Electronically Filed Documents RE: Statement (Motion related) <u>77</u> . The following error(s) was found: statement of uncontroverted facts are proposed documents to be approved by the Judge and should not be efiled, but submitted as a separate attachment to a main document. In response to this notice the court may order (1) an amended or correct document to be filed (2) the document stricken or (3) take other action as the court deems appropriate. You need not take any action in response to this notice unless and until the court directs you to do so. (lc) (Entered: 03/07/2012)
03/12/2012	<u>82</u>	Joint STIPULATION for Hearing re MOTION for Partial Summary Judgment <u>75</u> filed by plaintiff George Clinton. (Attachments: # <u>1</u> Proposed Order) (Thennisch, Jeffrey) (Entered: 03/12/2012)
03/12/2012		MOTION for Partial Summary Judgment <u>75</u> previously scheduled for 04/09/12 has been rescheduled to 4/16/2012 at 01:30 PM before Judge Otis D Wright II. THERE IS NO PDF DOCUMENT ASSOCIATED WITH THIS ENTRY.(sce) TEXT ONLY ENTRY (Entered: 03/12/2012)
03/12/2012	<u>83</u>	ORDER by Judge Otis D Wright, II, re Stipulation the following dates are continued <u>68</u> :Jury Trial June 5, 2012 at 9:00 a.m.; Last day to file Final Pretrial Ex. Stip. May 25, 2012; Hearing on motion in limine May 21, 2012 at 2:30 p.m.; Pre-trial Conference May 7, 2012 at 2:30 p.m.; Last day to lodge proposed PTO, etc. April 30, 2012; Last day for hearing on motions April 9, 2012; Last day to conduct settlement conference April 2, 2012; Discovery Cut-Off February 29, 2012;It is hereby further ORDERED that the original due dates for Plaintiffs Opposition and Defendants Reply to Defendants March 7, 2012 Motion for Partial Summary Judgment (Dkt. No. 76) remain unaffected by this Order. Thus, Plaintiffs Opposition is due by March 19, 2012, andDefendants Reply is due by March 26, 2012. (lc) (Entered: 03/13/2012)
03/19/2012	<u>84</u>	Plaintiff's Response In Opposition To Defendants' Request For Judicial Notice In Support Of Motion For Partial Summary Judgment Opposition re: MOTION for Partial Summary Judgment <u>75</u> filed by Plaintiff George Clinton. (Attachments: # <u>1</u> Exhibit A)(Thennisch, Jeffrey) (Entered: 03/19/2012)
03/19/2012	<u>85</u>	REQUEST FOR JUDICIAL NOTICE re MOTION for Partial Summary Judgment <u>75</u> <i>Opposition</i> filed by George Clinton George Clinton. (Attachments: # <u>1</u> Exhibit A)(Thennisch, Jeffrey) (Entered: 03/19/2012)
03/19/2012	<u>86</u>	DECLARATION of George Clinton In Opposition to MOTION for Partial Summary Judgment <u>75</u> filed by Plaintiff George Clinton. (Thennisch, Jeffrey) (Entered: 03/19/2012)
03/19/2012	<u>87</u>	DECLARATION of Eban Kelly In Opposition to MOTION for Partial Summary Judgment <u>75</u> filed by Plaintiff George Clinton. (Thennisch, Jeffrey) (Entered: 03/19/2012)

		03/19/2012)
03/19/2012	<u>88</u>	DECLARATION of Jeffrey P. Thennisch In Opposition to MOTION for Partial Summary Judgment <u>75</u> filed by Plaintiff George Clinton. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B, # <u>3</u> Exhibit C, # <u>4</u> Exhibit D, # <u>5</u> Exhibit E)(Thennisch, Jeffrey) (Entered: 03/19/2012)
03/19/2012	<u>89</u>	STATEMENT of Genuine Disputes of Material Facts filed by Plaintiff George Clinton (Thennisch, Jeffrey) (Entered: 03/19/2012)
03/19/2012	<u>90</u>	OPPOSITION to MOTION for Partial Summary Judgment <u>75</u> filed by Plaintiff George Clinton. (Thennisch, Jeffrey) (Entered: 03/19/2012)
03/26/2012	<u>91</u>	REPLY in Support of Defendants' MOTION for Partial Summary Judgment <u>75</u> filed by Defendants Will Adams, Stacy Ferguson, Jaime Gomez, Allan Pineda, Tab Magnetic, Inc., Will I Am Music, Inc.. (Attachments: # <u>1</u> Declaration Reply Declaration of Allen B. Grodsky, # <u>2</u> Exhibit Exhibit 15)(Grodsky, Allen) (Entered: 03/26/2012)
03/26/2012	<u>92</u>	Objections to Evidence Offered by Plaintiff in Opposition to Defendants' Motion for Partial Summary Judgment re: MOTION for Partial Summary Judgment <u>75</u> filed by Defendants Will Adams, Stacy Ferguson, Jaime Gomez, Allan Pineda, Tab Magnetic, Inc., Will I Am Music, Inc.. (Grodsky, Allen) (Entered: 03/26/2012)
04/10/2012	<u>93</u>	REQUEST for ADR Procedure No. 2 filled. Parties request to appear before a neutral selected from the court's Mediation Panel for mediation. Filed by Plaintiff George Clinton(Thennisch, Jeffrey) (Entered: 04/10/2012)
04/11/2012	<u>94</u>	MINUTES (IN CHAMBERS) by Judge Otis D Wright, II: Hearing on MOTION for Partial Summary Judgment <u>75</u> , scheduled for April 16, 2012 at 1:30 p.m., is hereby VACATED and taken off calendar. No appearances are necessary. The matter stands submitted, and will be decided upon without oral argument. An order will issue. (lc) (Entered: 04/11/2012)
04/12/2012		ON THE COURT'S OWN MOTION, the Motion in Limine hearing previously scheduled for 5/21/12 has been rescheduled to 5/14/2012 at 10:00 AM before Judge Otis D Wright II. THERE IS NO PDF DOCUMENT ASSOCIATED WITH THIS ENTRY.(sce) TEXT ONLY ENTRY (Entered: 04/12/2012)
04/12/2012		ON THE COURT'S OWN MOTION, the Pretrial Conference previously scheduled for 05/21/12 3:30 PM has been rescheduled to 5/22/2012 at 10:00 AM before Judge Otis D Wright II. THERE IS NO PDF DOCUMENT ASSOCIATED WITH THIS ENTRY.(sce) TEXT ONLY ENTRY (Entered: 04/12/2012)
04/18/2012	<u>95</u>	ORDER/REFERRAL to ADR Procedure No 2 by Judge Otis D Wright, II. Case ordered to Court Mediation Panel for mediation. (cch) (Entered: 04/18/2012)

04/24/2012		ON THE COURT'S OWN MOTION, the MOTION for Partial Summary Judgment <u>75</u> is set for 5/1/2012 at 11:30 AM before Judge Otis D Wright II. (TELEPHONIC)THERE IS NO PDF DOCUMENT ASSOCIATED WITH THIS ENTRY.(sce) TEXT ONLY ENTRY (Entered: 04/24/2012)
04/30/2012	<u>96</u>	JOINT Exhibit List filed by Plaintiff and Defendants Will Adams, George Clinton, Stacy Ferguson, Jaime Gomez, Allan Pineda, Tab Magnetic, Inc., UMG Recordings, Inc., Will I Am Music, Inc... (Grotsky, Allen) (Entered: 04/30/2012)
04/30/2012	<u>97</u>	PROPOSED JURY INSTRUCTIONS (Annotated set) filed by Plaintiff and Defendants Will Adams, George Clinton, Stacy Ferguson, Jaime Gomez, Allan Pineda, Tab Magnetic, Inc., UMG Recordings, Inc., Will I Am Music, Inc... (Grotsky, Allen) (Entered: 04/30/2012)
04/30/2012	<u>98</u>	PROPOSED JURY VERDICT filed by Plaintiff and Defendants Will Adams, George Clinton, Stacy Ferguson, Jaime Gomez, Allan Pineda, Tab Magnetic, Inc., UMG Recordings, Inc., Will I Am Music, Inc.. (Grotsky, Allen) (Entered: 04/30/2012)
04/30/2012	<u>99</u>	Witness List filed by Defendants Will Adams, Stacy Ferguson, Jaime Gomez, Allan Pineda, Tab Magnetic, Inc., Will I Am Music, Inc... (Grotsky, Allen) (Entered: 04/30/2012)
04/30/2012	<u>100</u>	MEMORANDUM of CONTENTIONS of FACT and LAW filed by Defendants Will Adams, Stacy Ferguson, Jaime Gomez, Allan Pineda, Tab Magnetic, Inc., Will I Am Music, Inc.. (Grotsky, Allen) (Entered: 04/30/2012)
04/30/2012	<u>101</u>	JOINDER filed by Defendant UMG Recordings, Inc. joining in Witness List <u>99</u> . (Burrow, Linda) (Entered: 04/30/2012)
04/30/2012	<u>102</u>	JOINDER filed by Defendant UMG Recordings, Inc. joining in Memorandum of Contentions of Fact and Law <u>100</u> . (Burrow, Linda) (Entered: 04/30/2012)
04/30/2012	<u>103</u>	MEMORANDUM of CONTENTIONS of FACT and LAW filed by Plaintiff George Clinton. (Thennisch, Jeffrey) (Entered: 04/30/2012)
04/30/2012	<u>104</u>	Witness List filed by plaintiff George Clinton.. (Thennisch, Jeffrey) (Entered: 04/30/2012)
04/30/2012	<u>105</u>	PROPOSED JURY INSTRUCTIONS filed by plaintiff George Clinton.. (Thennisch, Jeffrey) (Entered: 04/30/2012)
05/01/2012	<u>106</u>	MINUTES OF Motion for Summary Judgment <u>75</u> - Telephonic Hearing held before Judge Otis D Wright II. Case called, telephonic appearances made. The Court hears oral argument. This matter stands submitted. An order will issue. Court Reporter: Katie Thibodeaux. (sch) (Entered: 05/01/2012)
05/07/2012	<u>107</u>	ORDER Granting in Part and Denying in Part Defendants' Motion for Summary Judgment <u>75</u> by Judge Otis D Wright, II. See order for details. (cch) (Entered: 05/07/2012)



		05/07/2012)
05/07/2012	<u>108</u>	MEDIATION REPORT Filed by Mediator (ADR Panel) Gail Killefer: Mediation held on April 27, 2012. The parties are unable to reach an agreement at this time. Negotiations are ongoing.(mb) (Entered: 05/07/2012)
05/14/2012	<u>109</u>	MINUTE ORDER IN CHAMBERS by Judge Otis D Wright, II. Having been advised by the parties that the settlement has been reached and because no Motions in Limine have been filed in this action, the Court on its own motion, vacates the Motion in Limine Hearing set for May 14, 2012 at 10:00 a.m. (cch) (Entered: 05/14/2012)
05/14/2012	<u>110</u>	NOTICE of Settlement <i>and Stipulation to Vacate Order to Show Cause, Pre-Trial Conference and Trial Dates</i> filed by Plaintiff and Defendants Will Adams, George Clinton, Stacy Ferguson, Jaime Gomez, Allan Pineda, Tab Magnetic, Inc., UMG Recordings, Inc., Universal Music Group, Inc., Will I Am Music, Inc.. (Attachments: # <u>1</u> Proposed Order)(Grotsky, Allen) (Entered: 05/14/2012)
05/15/2012	<u>111</u>	ORDER by Judge Otis D Wright, II, re Notice of Settlement and stipulation <u>110</u> :1. The Parties Notice of Settlement and Stipulation to Vacate Order to Show Cause, Final Pre-Trial Conference and Trial Dates is hereby APPROVED. 2. The Courts order to show cause no later than May 21, 2012 why Defendant will.i.am music, inc. should not have default judgment entered against is hereby VACATED. 3. The Final Pre-Trial Conference presently scheduled for May 22, 2012 is hereby VACATED. 4. The trial date presently scheduled for June 5, 2012 is hereby VACATED. 5. Within 21 days of the date of entry of this Order, the Parties shall submit a Joint Status Report regarding the status of their efforts to memorialize a long-form settlement agreement, and the status of Plaintiffs efforts to obtain approval of the settlement from the Court or Plaintiffs lienholders. (lc) (Entered: 05/15/2012)
05/17/2012	<u>112</u>	MEDIATION REPORT Filed by Mediator (ADR Panel) Gail Killefer: Mediation held on 4/27 - 5/11/2012 and the case has been completely settled. Pending approval of the Court or Lienholder. With the filing of this Report, the parties are advised that they must notify the trial judges deputy courtroom clerk of the fact of settlement and to promptly file documents regarding the final disposition of the case.(mb) (Entered: 05/17/2012)
05/18/2012	<u>113</u>	MINUTE ORDER (IN CHAMBERS) by Judge Otis D Wright II. The Court orders the parties to show cause why settlement has not been finalized and sets a hearing on the matter for Monday, August 13, 2012 at 1:30 p.m. The OSC hearing will be vacated upon the filing of a stipulation and proposed order of dismissal. (sch) (Entered: 05/18/2012)
05/31/2012	<u>114</u>	Joint EX PARTE APPLICATION for Settlement Approval of settlement agreement, Joint EX PARTE APPLICATION to Dismiss Case filed by plaintiff George Clinton. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B, # <u>3</u> Exhibit C, # <u>4</u>

		Exhibit D, # <u>5</u> Proposed Order)(Thennisch, Jeffrey) (Entered: 05/31/2012)
06/01/2012	<u>115</u>	OPPOSITION to Joint EX PARTE APPLICATION for Settlement Approval of settlement agreementJoint EX PARTE APPLICATION to Dismiss Case <u>114</u> filed by Creditor Hendricks & Lewis PLLC. (Haas, Mary) (Entered: 06/01/2012)
06/05/2012	<u>116</u>	STATUS REPORT <i>Regarding Status of Settlement</i> filed by Defendants Will Adams, Stacy Ferguson, Jaime Gomez, Allan Pineda, Tab Magnetic, Inc., UMG Recordings, Inc., Will I Am Music, Inc., Plaintiff George Clinton. (Grodsky, Allen) (Entered: 06/05/2012)
06/06/2012	<u>117</u>	ORDER Denying Ex Parte Application to Approve Settlement Agreement and Dismiss the Action <u>114</u> by Judge Otis D Wright II. The Application is DENIED. Thisaction will remain open pending final distribution of the settlement proceeds. (sch) Modified on 6/7/2012 (lc). (ORDER WITHDRAWN PER 6/7/12 ORDER GRANTING THE EXPARTE INSTEAD). (Entered: 06/06/2012)
06/07/2012	<u>118</u>	ORDER WITHDRAWING ORDER DENYING EX PARTE APPLICATION TO APPROVE SETTLEMENT AGREEMENT AND DISMISS THE ACTION <u>117</u> AND GRANTING SAID EX PARTE APPLICATION <u>114</u> . Plaintiff shall lodge a proposed judgment reflecting this outcome forthwith by Judge Otis D Wright, II. (Made JS-6. Case Terminated.) (lc) (Entered: 06/07/2012)
06/07/2012	<u>119</u>	REPORT ON THE DETERMINATION OF AN ACTION Regarding a Copyright. (Closing) Mailed closing report to Copyright Office. (Attachments: # <u>1</u> order) (lc) (Entered: 06/07/2012)
06/08/2012	<u>120</u>	STIPULATION to Dismiss Case pursuant to Fed.R.Civ.P. 41(a) filed by Plaintiff George Clinton.(Thennisch, Jeffrey) (Entered: 06/08/2012)
06/08/2012	<u>121</u>	NOTICE of Manual Filing filed by Plaintiff George Clinton (Thennisch, Jeffrey) (Entered: 06/08/2012)
06/12/2012	<u>130</u>	SEALED DOCUMENT- GEORGE CLINTON'S EXPARTE APPLICATION to File Motion for Division and Distribution of Settlement Funds Under Seal Pursuant to Local Rule 79-5.1 (mat) (Entered: 06/22/2012)
06/14/2012	<u>122</u>	Corrected NOTICE of Manual Filing filed by Plaintiff George Clinton (Thennisch, Jeffrey) (Entered: 06/14/2012)
06/14/2012	<u>123</u>	EX PARTE APPLICATION for Consideration of Request for Access to Plaintiff's Motion for Division and Distribution of Settlement Funds Under Fed. R. Civ. P. 69(a) with Exhibits A-D Filed Under Seal (Docket Nos. 121, 122) filed by Judgment Lien Holder Hendricks & Lewis PLLC. (Attachments: # <u>1</u> Proposed Order)(Haas, Mary) (Entered: 06/14/2012)
06/15/2012	<u>124</u>	Third Party EX PARTE APPLICATION for Joinder in Notice of Manual Filing (G-92) <u>122</u> , EX PARTE APPLICATION for Consideration of Request for Access to Plaintiff's Motion for Division and Distribution of Settlement Funds Under Fed. R. Civ. P. 69(a) with Exhibits A-D Filed Under Seal (Docket Nos.

		121, 122) EX PARTE APPLICATION for Consideration of Request for Access to Plaintiff's Motion for Division and Distribution of Settlement Funds Under Fed. R. Civ. P. 69(a) with Exhibits A-D Filed Under Seal (Docket Nos. 121, 122) <u>123</u> filed by Plaintiff George Clinton.(Allan, Robert) (Entered: 06/15/2012)
06/15/2012	<u>126</u>	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 filed by plaintiff George Clinton.(lc) (Entered: 06/21/2012)
06/19/2012	<u>125</u>	ORDER GRANTING <u>123</u> , <u>124</u> ,EX PARTE APPLICATION OF JUDGMENT LIENHOLDER HENDRICKS &LEWIS PLLC REQUESTING ACCESS TO PLAINTIFFS MOTION FOR DIVISION ANDDISTRIBUTION OF SETTLEMENT FUNDS UNDER FED. R. CIV. P. 69(a) WITH EXHIBITS A-D FILED UNDER SEAL (DKTS. #121, 122); Plaintiffs Counsel shall serve by email within twenty-four hours of this Order all lienholders, including Hendricks & Lewis and The Allan Law Group with a copy of the Motion for Division and Distribution of Settlement and all exhibits by Judge Otis D Wright, II (lc) Modified on 6/19/2012 (lc). (Entered: 06/19/2012)
06/19/2012	<u>127</u>	NOTICE OF DOCUMENT DISCREPANCIES AND ORDER by Judge Otis D Wright, II ORDERING ex parte application for order to fsea; motion for division and distribution of settlement funds, order submitted by Plaintiff George Clinton received on 6/15/12 to be filed and processed; filed date to be the date the document was stamped Received but not Filed with the Clerk. (lc) (Entered: 06/21/2012)
06/19/2012	<u>128</u>	ORDER by Judge Otis D Wright, II: granting <u>126</u> Plaintiff George Clinton's application under Local Rule 79-5.1 to file the Clinton Motion and Proposed Order, all containing financial and work product materials under seal is hereby GRANTED. (lc) (Entered: 06/21/2012)
06/19/2012	<u>129</u>	NOTICE OF DOCUMENT DISCREPANCIES AND ORDER by Judge Otis D Wright, II ORDERING ex parte to file Clinton motion for division and distribution, lacking LR 11-3.8 information; lacking lodged proposed judgment, documents not submitted under separate cover, submitted by Plaintiff George Clinton received on 6/12/12 to be filed and processed; filed date to be the date the document was stamped Received but not Filed with the Clerk. (lc) (Entered: 06/21/2012)
06/20/2012	<u>131</u>	ORDER GRANTING GEORGE CLINTON'S EX PARTE APPLICATION TO FILE CLINTON MOTION FOR DIVISION AND DISTRIBUTION OF SETTLEMENT FUNDS UNDER FED.R.CIV.P. 69 UNDER SEAL PURSUANT TO LOCAL RULE 79-5.1 <u>130</u> by Judge Otis D Wright, II (lc) (Entered: 06/22/2012)
06/20/2012	<u>132</u>	SEALED DOCUMENT- MOTION for Division and Distribution of Settlement Funds Under FED. R. CIV.P 69(a). (mat) (Entered: 06/22/2012)

<b>PACER Service Center</b>			
<b>Transaction Receipt</b>			
06/22/2012 13:26:44			
<b>PACER Login:</b>	hl0015	<b>Client Code:</b>	888155
<b>Description:</b>	Docket Report	<b>Search Criteria:</b>	2:10-cv-09476-ODW -PLA End date: 6/22/2012
<b>Billable Pages:</b>	17	<b>Cost:</b>	1.70

**EXHIBIT J**

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IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SETTLE

GEORGE CLINTON, an individual,

Plaintiff,

vs.

HENDRICKS & LEWIS, PLLC, a  
Washington professional limited liability  
company, and

OSCAR YALE LEWIS, JR, an individual  
resident of the State of Washington,

Defendants.

No. 2:11-CV-01142-RSL

The Honorable Robert S. Lasnik

**DECLARATION OF GEORGE  
CLINTON IN SUPPORT OF  
PLAINTIFF'S RESPONSE TO  
DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT ON  
PLAINTIFF'S FIRST AND  
SECOND CLAIMS**

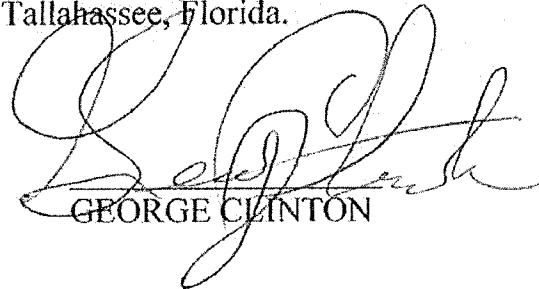
Pursuant to 28 U.S.C. § 1746, George Clinton declares as follows:

1. The facts set forth herein are within my personal knowledge and, if sworn as a witness, I could and would testify thereto under oath.
2. I am the plaintiff in this action.
3. I am, and at all times during the legal representation of H&L and afterwards, was a resident of the state of Florida, with an address in Tallahassee, Florida.
4. The defendants are Hendrick & Lewis PLLC (H&L.) and Oscar Yale Lewis, Jr. collectively, H & L.

- 1 5. I traveled to the State of Washington to meet with H&L at their office at 901 Fifth  
2 Avenue, Suite 4100, Seattle, Washington 98164, to sign a legal representation  
3 agreement with H&L on May 25, 2005.
- 4 6. I negotiated and signed the legal representation agreement with H&L in Seattle on May  
5 25, 2005.
- 6 7. I gave press interviews promoting the defendants to Seattle, Washington media outlets  
7 at the request of the defendants; the Seattle Weekly article which was published on  
8 April 2, 2008. Attached as Exhibit A.
- 9 8. Defendants represented me in cases in courts in Tennessee, California, Michigan, and  
10 Florida.
- 11 9. The H&L website contained, and to this day contains, statements relating to me and  
12 links for the Washington media releases which are clearly not limited to anything that  
13 transpired in the State of California. Attached as Exhibit B.
- 14
- 15

16 I declare under penalty of perjury under the law of the state of Florida that the foregoing is  
17 true and correct.

18 DATED this 5<sup>th</sup> day of March, 2012, in Tallahassee, Florida.

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22 GEORGE CLINTON  
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## **EXHIBIT K**



**SEARCH REPORT**

ACCOUNT NUMBER: 3611  
CONTACT: KRISTINA ROTH  
COMPANY: DAVIS WRIGHT TREMAINE, L.L.P.  
CLIENT REFERENCE NUMBER: 81687-3

JOB NUMBER: 157066  
DATE: 06/01/2012  
PAGE 1 OF 3  
SERVICE REP: AMANDA MARTINEZ/NJ

**ENTITY NAME: CLINTON, GEORGE**

**JURISDICTION: FLORIDA**

**TYPE OF SEARCH: UCC**

**UCC FILINGS Thru: 05/30/2012**

DOCUMENT NUMBER: **201104551657**

FILE DATE: **05/09/2011**

SECURED PARTY: **HENDRICKS & LEWIS PLLC**

DOCUMENT NUMBER: **201003469777**

FILE DATE: **10/27/2010**

SECURED PARTY: **HENDRICKS & LEWIS PLLC**

DOCUMENT NUMBER: **200900487354**

FILE DATE: **05/07/2009**

SECURED PARTY: **U.S. BANK NATIONAL ASSOCIATION**

UCC-3 FILING(S): **TERMINATION FILED 11/28/2011; DOCUMENT NUMBER 201105730342**

DOCUMENT NUMBER: **200809685203**

FILE DATE: **12/12/2008**

SECURED PARTY: **US BANK NATIONAL ASSOCIATION**

**SEARCH REPORT**

ACCOUNT NUMBER: 3611  
CONTACT: KRISTINA ROTH  
COMPANY: DAVIS WRIGHT TREMAINE, L.L.P.  
CLIENT REFERENCE NUMBER: 81687-3

JOB NUMBER: 157066  
DATE: 06/01/2012  
PAGE 2 OF 3  
SERVICE REP: AMANDA MARTINEZ/NJ

ENTITY NAME: CLINTON, GEORGE

**UCC FILINGS CONTINUED**

DOCUMENT NUMBER: **200808879977**

FILE DATE: **08/04/2008**

SECURED PARTY: **US BANK NATIONAL ASSOCIATION**

UCC-3 FILING(S): **TERMINATION FILED 12/08/2008; DOCUMENT NUMBER 200809651171**

DOCUMENT NUMBER: **200808785204**

FILE DATE: **07/21/2008**

SECURED PARTY: **US BANK NATIONAL ASSOCIATION**

UCC-3 FILING(S): **TERMINATION FILED 08/06/2009; DOCUMENT NUMBER 200900989082**

DOCUMENT NUMBER: **200808065708**

FILE DATE: **04/11/2008**

SECURED PARTY: **U.S. BANK NATIONAL ASSOCIATION ND**

UCC-3 FILING(S): **TERMINATION FILED 08/10/2009; DOCUMENT NUMBER 20090100974X**

2020 HURLEY WAY, SUITE 350  
SACRAMENTO, CA 95825



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TEL: 916.564.7800 / 800.952.5696  
FAX: 916.564.7900

### SEARCH REPORT

ACCOUNT NUMBER: 3611 CONTACT: KRISTINA ROTH COMPANY: DAVIS WRIGHT TREMAINE, L.L.P. CLIENT REFERENCE NUMBER: 81687-3	JOB NUMBER: 157066 DATE: 06/01/2012 PAGE 3 OF 3 SERVICE REP: AMANDA MARTINEZ/NJ
--	--

ENTITY NAME: CLINTON, GEORGE

### UCC FILINGS CONTINUED

DOCUMENT NUMBER:	<b>200706747680</b>
FILE DATE:	<b>10/11/2007</b>
SECURED PARTY:	<b>US BANK</b>
DOCUMENT NUMBER:	<b>200604468111</b>
FILE DATE:	<b>12/29/2006</b>
SECURED PARTY:	<b>US BANK</b>
UCC-3 FILING(S):	<b>TERMINATION FILED 10/08/2007; DOCUMENT NUMBER 200706718605</b>
DOCUMENT NUMBER:	<b>200604216678</b>
FILE DATE:	<b>11/27/2006</b>
SECURED PARTY:	<b>US BANK</b>
UCC-3 FILING(S):	<b>TERMINATION FILED 01/03/2007; DOCUMENT NUMBER 200704493991</b>