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

15
16 **UNITED STATES DISTRICT COURT**
17 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**
18

19 GEORGE CLINTON, an individual,

20 Plaintiff,

21 v.

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

Case No. CV10-9476 ODW (PLAx)

Hon. Otis D. Wright, II
Courtroom 11

**ANSWER OF DEFENDANT
WILLIAM ADAMS AND WILL.IAM
MUSIC, INC.**

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

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

Defendants.

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1 Defendants William Adams p/k/a “will.i.am” (incorrectly identified as “WILL
2 ADAMS, p/k/a will.i.am, individually and d/b/a WILL.I AM MUSIC
3 PUBLISHING”¹) and will.i.am music, inc. present the following Answer to
4 Plaintiff’s Complaint (“Complaint”):

5 **NATURE OF THE ACTION**

6 1. Answering Paragraph 1 of the Complaint, Defendant Adams admits
7 that Plaintiff is asking for certain relief, but denies that Plaintiff is entitled to such
8 relief. Further, Defendant Adams admits “Shut Up” was first released in 2003 and
9 two remixes were released in 2003 and 2009, respectively. Defendant Adams
10 denies the remaining allegations.

11 2. Answering Paragraph 2 of the Complaint, Defendant Adams lacks
12 sufficient information to admit or deny the allegations contained in Paragraph 2, and
13 on that basis denies each and every such allegation.

14 3. Answering Paragraph 3 of the Complaint, Defendant Adams admits
15 that Plaintiff is asking for certain relief, but denies that Plaintiff is entitled to such
16 relief, and further denies the remaining allegations of the paragraph.

17 **JURISDICTION AND VENUE**

18 4. Answering Paragraph 4 of the Complaint, Defendant Adams admits, on
19 information and belief, that this action appears to arise under the Copyright Act and
20 that this Court would appear to have subject matter jurisdiction. Defendant Adams
21 denies that the Complaint states any claim upon which relief can be granted.

22 5. Answering Paragraph 5 of the Complaint, Defendant Adams admits
23 that he may be found in this district. As to the remaining allegations, Defendant
24 Adams lacks sufficient information to admit or deny them, and on that basis, denies
25 such allegations.

26 6. Answering Paragraph 6 of the Complaint, Defendant Adams admits

27 ¹ WILL.I AM MUSIC PUBLISHING does not exist as a d/b/a or otherwise.
28

1 that he resides in Los Angeles County, California. As to the remaining allegations,
2 Defendant Adams lacks sufficient information to admit or deny them, and on that
3 basis denies such allegations.

4 7. Answering Paragraph 7 of the Complaint, Defendant Adams lacks
5 sufficient information to admit or deny the allegations of Paragraph 7, and on that
6 basis denies each and every such allegation.

7 8. Answering Paragraph 8 of the Complaint, Defendant Adams admits
8 that will.i.am music, inc. has conducted business in the State of California.
9 Defendant Adams lacks sufficient information to admit or deny the remaining
10 allegations contained in Paragraph 8, and on that basis denies each and every such
11 allegation.

12 **PARTIES**

13 9. Answering Paragraph 9 of the Complaint, Defendant Adams admits
14 Clinton is a well-known artist and composer. Defendant Adams is without
15 sufficient information to admit or deny the remaining allegations of Paragraph 9, and
16 on that basis denies such allegations.

17 10. Answering Paragraph 10 of the Complaint, Defendant Adams admits
18 that he is a resident of California and a founding member of the musical group, The
19 Black Eyed Peas, and has been credited as a producer and songwriter for various
20 songs released by that group. Defendant Adams denies that will.i.am Music
21 Publishing is a sole proprietorship of Defendant Adams or a publisher of any songs
22 written by Defendant Adams and released by The Black Eyed Peas. Defendant
23 Adams admits that “(Not Just) Knee Deep” was sampled in certain remixes of “Shut
24 Up” pursuant to a license.

25 11. Answering Paragraph 11 of the Complaint, Defendant Adams admits
26 that Defendant Allan Pineda lives in California and is a founding member of the
27 musical group, The Black Eyed Peas, and has been credited as a songwriter for
28 various songs released by that group. Except as otherwise admitted in this Answer,

1 Defendant Adams is without sufficient information to admit or deny the allegations
2 of Paragraph 11, and on that basis denies such allegations.

3 12. Answering Paragraph 12 of the Complaint, Defendant Adams admits
4 that Defendant Jaime Gómez lives in California and is a founding member of the
5 musical group, The Black Eyed Peas, and has been credited as a songwriter for
6 various songs released by that group. Except as otherwise admitted in this Answer,
7 Defendant Adams lacks information sufficient to form a belief as to what Plaintiff is
8 informed or believes, and on that basis denies the remaining allegations in this
9 paragraph.

10 13. Answering Paragraph 13 of the Complaint, Defendant Adams admits
11 that Defendant Stacy Ferguson first collaborated with The Black Eyed Peas on the
12 album Elephunk and performs vocally on certain remixes of the song “Shut Up.”
13 Except as otherwise admitted in this Answer, Defendant Adams lacks information
14 sufficient to form a belief as to what Plaintiff is informed or believes, and on that
15 basis denies the remaining allegations in this paragraph.

16 14. Answering Paragraph 14 of the Complaint, Defendant Adams admits
17 that Defendant George Pajon, Jr. is credited as a songwriter on various songs
18 released by the group, The Black Eyed Peas. Except as otherwise admitted in this
19 Answer, Defendant Adams is without sufficient information to admit or deny the
20 allegations of Paragraph 14, and on that basis denies such allegations.

21 15. Answering Paragraph 15 of the Complaint, Defendant Adams admits
22 that Defendant John Curtis is credited as a songwriter on various songs released by
23 the group, The Black Eyed Peas. Except as otherwise admitted in this Answer,
24 Defendant Adams is without sufficient information to admit or deny the allegations
25 of Paragraph 15, and on that basis denies such allegations.

26 16. Answering Paragraph 16 of the Complaint, Defendant Adams admits
27 that the remaining defendants are commercial entities within the music industry.
28 Except as otherwise admitted in this Answer, Defendant Adams is without sufficient

1 information to admit or deny the allegations of Paragraph 16, and on that basis
2 denies such allegations.

3 17. Answering Paragraph 17 of the Complaint, Defendant Adams lacks
4 sufficient information to admit or deny the allegations contained in Paragraph 17,
5 and on that basis denies each and every such allegation.

6 18. Answering Paragraph 18 of the Complaint, Defendant Adams lacks
7 sufficient information to admit or deny the allegations contained in Paragraph 18,
8 and on that basis denies each and every such allegation.

9 19. Answering Paragraph 19 of the Complaint, Defendant Adams is
10 without sufficient information to admit or deny the allegations of Paragraph 19, and
11 on that basis denies such allegations.

12 20. Answering Paragraph 20 of the Complaint, Defendant Adams denies
13 exploiting infringing sound records. Defendant Adams lacks information sufficient
14 to form a belief as to what Plaintiff is informed or believes, and on that basis denies
15 the remaining allegations in this paragraph.

16 21. Answering Paragraph 21 of the Complaint, Defendant Adams lacks
17 information sufficient to form a belief as to what Plaintiff is informed or believes,
18 and on that basis denies the allegations in this paragraph.

19 22. Answering Paragraph 22 of the Complaint, Defendant Adams lacks
20 information sufficient to form a belief as to what Plaintiff is informed or believes,
21 and on that basis denies the allegations in this paragraph.

22 23. Answering Paragraph 23 of the Complaint, Defendant Adams lacks
23 information sufficient to form a belief as to what Plaintiff is informed or believes,
24 and on that basis denies the allegations in this paragraph.

25 24. Answering Paragraph 24 of the Complaint, Defendant Adams lacks
26 information sufficient to form a belief as to what Plaintiff is informed or believes,
27 and on that basis denies the allegations in this paragraph.

28 25. Answering Paragraph 25 of the Complaint, Defendant Adams lacks

1 sufficient information to admit or deny the allegations contained in Paragraph 25,
2 and on that basis denies each and every such allegation.

3 26. Answering Paragraph 26 of the Complaint, Defendant Adams denies
4 the allegations in this paragraph.

5 27. Answering Paragraph 27 of the Complaint, Defendant Adams denies
6 the allegations in this paragraph.

7 **SAMPLING “(NOT JUST) KNEE DEEP”**

8 28. Answering Paragraph 28 of the Complaint, Defendant Adams admits
9 that certain remixes of “Shut Up” contain authorized samples of “(Not Just) Knee
10 Deep” pursuant to a license. Except as expressly admitted, Defendant Adams denies
11 the allegations in this paragraph.

12 29. Answering Paragraph 29 of the Complaint, Defendant Adams admits
13 that certain remixes of “Shut Up” contain authorized samples of “(Not Just) Knee
14 Deep” pursuant to a license. Except as expressly admitted, Defendant Adams denies
15 the allegations in this paragraph.

16 30. Answering Paragraph 30 of the Complaint, Defendant Adams admits
17 that certain remixes of “Shut Up” contain authorized samples of “(Not Just) Knee
18 Deep” pursuant to a license. Defendant Adams further admits that sound recordings
19 of the musical compositions “Shut Up” and “Shut Up Remix” have been exploited
20 since their creation. Except as admitted herein, Defendant Adams denies the
21 allegations in this paragraph.

22 31. Answering Paragraph 31 of the Complaint, Defendant Adams admits
23 that, upon information and belief, a recording of “(Not Just)” Knee Deep” appears
24 on Funkadelic’s album “Uncle Jam Wants You,” and on information and belief it
25 has been sampled by many musical artistis. Defendant Adams lacks sufficient
26 information to admit or deny the remaining allegations of Paragraph 31, and on that
27 basis, denies such remaining allegations.

28 32. Answering Paragraph 32 of the Complaint, Defendant Adams lacks

1 sufficient information to admit or deny the allegations of Paragraph 32, and on that
2 basis denies each and every such allegation.

3 33. Answering Paragraph 33 of the Complaint, Defendant Adams lacks
4 sufficient information to admit or deny the allegations of Paragraph 33, and on that
5 basis denies each and every such allegation.

6 34. Answering Paragraph 34 of the Complaint, Defendant Adams lacks
7 sufficient information to admit or deny the allegations of Paragraph 34, and on that
8 basis, denies each and every such allegation.

9 35. Answering Paragraph 35 of the Complaint, Defendant Adams lacks
10 sufficient information to admit or deny the allegations of Paragraph 35, and on that
11 basis denies each and every such allegation.

12 36. Answering Paragraph 36 of the Complaint, Defendant Adams lacks
13 sufficient information to admit or deny the allegations of Paragraph 36, and on that
14 basis denies each and every such allegation.

15 37. Answering Paragraph 37 of the Complaint, Defendant Adams denies
16 the allegations in this paragraph.

17 38. Answering Paragraph 38 of the Complaint, Defendant Adams denies
18 the allegations in this paragraph.

19 **RELEASE OF SHUT UP REMIX**

20 39. Answering Paragraph 39 of the Complaint, Defendant Adams admits
21 the allegations in this paragraph.

22 40. Answering Paragraph 40 of the Complaint, Defendant Adams admits
23 the allegations in this paragraph.

24 41. Answering Paragraph 41 of the Complaint, Defendant Adams lacks
25 information sufficient to form a belief as to what Plaintiff is informed or believes,
26 and on that basis denies the allegations in this paragraph.

27 42. Answering Paragraph 42 of the Complaint, Defendant Adams admits,
28 upon information and belief, the allegations in this paragraph.

1 43. Answering Paragraph 43 of the Complaint, Defendant Adams lacks
2 sufficient information to admit or deny the allegations set forth in this paragraph,
3 and on that basis denies the same.

4 44. Answering Paragraph 44 of the Complaint, Defendant Adams admits
5 certin remixes have been exploited in singles. Defendant Adams lacks information
6 as to which remixes Plaintiff is referring to, and on that basis denies the remaining
7 allegations of the paragraph

8 45. Answering Paragraph 45 of the Complaint, Defendant Adams admits
9 that certain remixes contain authorized samples. Defendant Adams lacks
10 information as to which remixes Plaintiff is referring to, and on that basis denies the
11 remaining allegations of the paragraph.

12 46. Answering Paragraph 46 of the Complaint, Defendant Adams lacks
13 information as to which remixes Plaintiff is referring to, and on that basis denies the
14 remaining allegations of the paragraph.

15 47. Answering Paragraph 47 of the Complaint, Defendant Adams lacks
16 sufficient information to admit or deny the allegations set forth in this paragraph,
17 and on that basis denies the same.

18 48. Answering Paragraph 48 of the Complaint, Defendant Adams denies
19 the allegations in this paragraph.

20 **RELEASE OF “SHUT THE PHUNK UP REMIX”**

21 49. Answering Paragraph 49 of the Complaint, Defendant Adams lacks
22 sufficient information to admit or deny the allegations contained in Paragraph 49,
23 and on that basis, denies each and every allegation.

24 50. Answering Paragraph 50 of the Complaint, Defendant Adams lacks
25 sufficient information to admit or deny the allegations contained in Paragraph 50 of
26 the Complaint, and on that basis denies each and every such allegation.

27 51. Answering Paragraph 51 of the Complaint, Defendant Adams admits
28 that The Black Eyed Peas album, “The E.N.D.” was released in or about June of

1 2009, and that certain deluxe editions of the album contains a track entitled “Shut
2 the Phunk Up.” Defendant Adams denies the remaining allegations of this
3 paragraph.

4 52. Answering Paragraph 52 of the Complaint, Defendant Adams admits
5 that *The E.N.D.* was nominated by the Grammy Awards for “Album of the Year”
6 and won a Grammy Award for the “Best Pop Vocal Album” on or about January 31,
7 2010. Defenant Adams denies the remaining allegations in this paragraph.

8 53. Answering Paragraph 53 of the Complaint, Defendant Adams lacks
9 sufficient to form a belief as to what Plaintiff is informed or believes, and on that
10 basis denies the allegations in this paragraph.

11 54. Answering Paragraph 54 of the Complaint, Defendant Adams lacks
12 sufficient to form a belief as to what Plaintiff is informed or believes, and on that
13 basis denies the allegations in this paragraph.

14 55. Answering Paragraph 55 of the Complaint, Defendant Adams lacks
15 sufficient information to admit or deny the allegations contained in Paragraph 55,
16 and on that basis denies each and every such allegation.

17 56. Answering Paragraph 56 of the Complaint, Defendant Adams denies
18 the allegations in this paragraph.

19 57. Answering Paragraph 57 of the Complaint, Defendant Adams lacks
20 sufficient information to admit or deny the allegations contained in Paragraph 57,
21 and on that basis denies each and every such allegation.

22 58. Answering Paragraph 58 of the Complaint, Defendant Adams lacks
23 sufficient information to admit or deny the allegations contained in Paragraph 58,
24 and on that basis denies each and every such allegation.

25 59. Answering Paragraph 59 of the Complaint, Defendant Adams lacks
26 sufficient information to admit or deny the allegations contained in Paragraph 59,
27 and on that basis denies each and every such allegation.

28 60. Answering Paragraph 60 of the Complaint, Defendant Adams lacks

1 sufficient information to admit or deny the allegations contained in Paragraph 60,
2 and on that basis, denies each and every such allegation

3 61. Answering Paragraph 61 of the Complaint, Defendant Adams lacks
4 sufficient information to admit or deny the allegations contained in Paragraph 61,
5 and on that basis denies each and every such allegation.

6 62. Answering Paragraph 62 of the Complaint, Defendant Adams lacks
7 sufficient information to admit or deny the allegations contained in Paragraph 62,
8 and on that basis denies each and every such allegation.

9 **LEGAL REQUIREMENTS OF SAMPLING**

10 63. Answering Paragraph 63 of the Complaint, Defendant Adams lacks
11 sufficient information to admit or deny the allegations contained in this paragraph,
12 and on that basis denies each and every such allegation.

13 64. Answering Paragraph 64 of the Complaint, Defendant Adams lacks
14 sufficient information to admit or deny the allegations contained in this paragraph,
15 and on that basis denies each and every such allegation.

16 **LIABILITY OF EACH DEFENDANT AND DAMAGES TO PLAINTIFF**

17 65. Answering Paragraph 65 of the Complaint, Defendant Adams denies
18 the allegations in this paragraph.

19 66. Answering Paragraph 66 of the Complaint, Defendant Adams denies the
20 allegations in this paragraph.

21 67. Answering Paragraph 67 of the Complaint, Defendant Adams lacks
22 sufficient information to admit or deny the allegations contained in Paragraph 67,
23 and on that basis denies each and every such allegation.

24 68. Answering Paragraph 68 of the Complaint, Defendant Adams lacks
25 sufficient information to admit or deny the allegations contained in Paragraph 68,
26 and on that basis, denies each and every such allegation.

27 69. Answering Paragraph 69 of the Complaint, Defendant Adams denies
28 the allegations in this paragraph.

1 the allegations in this paragraph.

2 82. Answering Paragraph 82 of the Complaint, Defendant Adams denies
3 the allegations in this paragraph.

4 83. Answering Paragraph 83 of the Complaint, Defendant Adams denies
5 the allegations in this paragraph.

6 **SECOND CLAIM FOR RELIEF**

7 **(Declaratory Judgment;**

8 **against all named defendants and DOES 1 through 10)**

9 84. Answering Paragraph 84 of the Complaint, Defendant Adams
10 incorporates his answers and responses to Paragraphs 1-83 above, as if fully restated
11 herein.

12 85. Answering Paragraph 85 of the Complaint, Defendant Adams lacks
13 sufficient information to admit or deny the allegations contained in Paragraph 85,
14 and on that basis denies each and every such allegation.

15 86. Answering Paragraph 86 of the Complaint, Defendant Adams admits
16 that, upon information and belief, Plaintiff seeks declaratory relief, but denies that
17 he is entitled to such relief. As to the remaining allegations of Paragraph 86,
18 Defendant denies each and every such allegation.

19 87. Answering Paragraph 87 of the Complaint, Defendant Adams admits
20 that, upon information and belief, Plaintiff seeks declaratory relief, but denies that
21 he is entitled to such relief. As to the remaining allegations of Paragraph 87,
22 Defendant denies each and every such allegation.

23 **THIRD CLAIM FOR RELIEF**

24 **(Permanent injunction;**

25 **against all named defendants and DOES 1 through 10)**

26 88. Answering Paragraph 88 of the Complaint, Defendant Adams
27 incorporates his answers and responses to Paragraphs 1-87 above, as if fully restated
28 herein.

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THIRD DEFENSE

(Statute of Limitations)

3. The Complaint is barred by the applicable statute of limitations.

FOURTH DEFENSE

(Consent)

4. Plaintiffs claims and the relief requested because he consented to allegedly wrongful conduct stated in the Complaint.

FIFTH DEFENSE

(Waiver)

5. Plaintiff's claims and relief requested are barred by the equitable doctrine of waiver.

SIXTH DEFENSE

(Acquiescence)

6. Plaintiff's claims and relief requested are barred by the equitable doctrine of acquiescence.

SEVENTH DEFENSE

(Estoppel)

7. Plaintiff's claims and relief requested are barred by the equitable doctrine of estoppel.

EIGHTH DEFENSE

(Laches)

8. This Complaint is barred in whole or in part by the equitable doctrine of laches.

NINTH DEFENSE

(Unclean Hands)

9. Plaintiff's claims and requested relief are barred by the equitable doctrine of unclean hands.

RESERVATION OF RIGHTS

1
2 Defendant Adams reserves the right, upon completion of his investigation and
3 discovery, to advance such additional defenses and/or counterclaims as they may be
4 appropriate.
5

6 WHEREFORE, having fully answered Plaintiff’s Complaint, Defendant
7 Adams prays for judgment against Plaintiff and awarding Defendant Adams his
8 costs, interest, reasonable attorneys’ fees, together with such other and further relief
9 as the Court may deem proper.
10

11
12 Respectfully submitted,

13 Dated: March 4, 2011

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

16 By: /s/ Jonathan S. Pink

17 Jonathan S. Pink
18 Attorneys for Defendants
19 WILL ADAMS; ALLAN PINEDA; JAIME
20 GOMEZ; STACY FERGUSON;
21 WILL.I.AM MUSIC, INC.; CHERRY
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25 INC.
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1 **JURY TRIAL DEMAND**

2 Defendant Adams hereby demands a jury trial.

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4 Respectfully submitted,

5
6 Dated: March 4, 2011

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

8
9 By: /s/ Jonathan S. Pink

Jonathan S. Pink
Attorneys for Defendants
WILL ADAMS; ALLAN PINEDA; JAIME
10 GOMEZ; STACY FERGUSON;
11 WILL.I.AM MUSIC, INC.; CHERRY
12 LANE MUSIC PUBLISHING COMPANY,
13 INC.; TAB MAGNETIC, INC.; GEORGE
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15 INC.

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