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Attorneys for Plaintiff GEORGE CLINTON

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

GEORGE CLINTON, an individual,

Plaintiff,

v.

WILL ADAMS, p/k/a will,I,am
individually and d/b/a will.i.am music
publishing , et al.,

Defendants.

Case No. CV 10-09476-ODW-PLA

The Honorable Otis D. Wright II

**STIPULATED REQUEST FOR
VOLUNTARY STAY OF
DISCOVERY BETWEEN
CERTAIN PARTIES UNTIL
OCTOBER 31, 2011**

Action Filed: December 10, 2010

1
2 Plaintiff, George Clinton (hereinafter "CLINTON"), and the following
3 Defendants, WILL ADAMS (sued as Will Adams, p/k/a will.i.am, individually and
4 d/b/a WILL.I.AM MUSIC PUBLISHING), ALLAN PINEDA (sued as Allan Pineda
5 p/k/a apl.de.ap, individually and d/b/a JEEPNEY MUSIC PUBLISHING), JAIME
6 GOMEZ (sued as Jamie Gomez, p/k/a Taboo, individually and d/b/a NAWASHA
7 NETWORKS PUBLISHING), STACY FERGUSON (sued as Stacy Ferguson p/k/a
8 Fergie), WILL I AM MUSIC, INC., a California corporation; and CHERRY LANE
9 MUSIC PUBLISHING COMPANY, INC., a New York corporation; (hereinafter
10 collectively the "Stipulating Defendants"), by and through their respective counsel of
11 record and pursuant to the Federal Rules of Civil Procedure, hereby request a
12 voluntary stay of discovery and pending discovery responses between these parties
13 until Monday, October 31, 2011, during which time the above-identified parties will
14 engage in the voluntary exchange, disclosure, and dissemination of documents and
15 information agreed to by the parties for the purpose of engaging in good faith
16 settlement discussions.
17

18 The above-identified parties further agree that this requested voluntary stay shall
19 not include, encompass, or delay the deposition of a third party deponent named Eban
20 Kelly, to take place in the Commonwealth of Virginia in October 2011, in order to
21 preserve Mr. Kelly's testimony. If requested by the Court, the above-identified parties
22 shall jointly report the status of these good faith settlement discussions to the Court on
23 or about October 31, 2011.
24

25
26 **So Stipulated And Approved:**

27 s/ Jeffrey P. Thennisch
28 Jeffrey P. Thennisch (P51499)
Attorney for Plaintiff

So Stipulated And Approved:

s/Allen B.Grotsky(with consent)
Allen B. Grotsky (SBN 111064)
Attorney for Defendants

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7 September 28, 2011

September 28, 2011

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