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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

**[PROPOSED] ORDER GRANTING
STIPULATED REQUEST FOR
VOLUNTARY STAY OF
DISCOVERY BETWEEN
CERTAIN PARTIES UNTIL
OCTOBER 31, 2011**

Action Filed: December 10, 2010

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

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

19 After full consideration of the stipulated request submitted by CLINTON and the Stipulating
20 Parties, the Court finds that both good cause and a good faith basis exists for the requested voluntary
21 stay to allow the parties to exchange documents and information for the purpose of engaging in
22 similar good faith settlement discussions, accordingly

23 **IT IS THEREFORE ORDERED, ADJUDGED, AND DECREED:**

24 That the Stipulated Request for a voluntary stay of discovery between the above-identified
25 parties through October 31, 2011 be, and hereby is, GRANTED.

26 Date: _____

27 _____
28 Honorable Otis D. Wright II
United States District Judge
Central District of California

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So Stipulated And Approved:
s/ Jeffrey P. Thennisch
Jeffrey P. Thennisch (P51499)
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September 28, 2011

So Stipulated And Approved:
s/Allen B.Grotsky(with consent)
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September 28, 2011