

EXHIBIT A

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8 Attorneys for Defendants
9 WILL ADAMS, et al.

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA

12 GEORGE CLINTON, an individual,
13 Plaintiff,

14 v.

15 WILL ADAMS, p/k/a will.i.am,
16 individually and d/b/a WILL.I.AM MUSIC
17 PUBLISHING, an individual; et al.,
18 Defendants.

Case No. CV 10-9476 ODW (PLAx)

Honorable Otis D. Wright II, Ctrm 11

**FIRST SET OF REQUESTS FOR
ADMISSION PROPOUNDED BY
DEFENDANT WILL ADAMS TO
PLAINTIFF GEORGE CLINTON**

18 PROPOUNDING PARTY: Defendant Will Adams
19 RESPONDING PARTY: Plaintiff George Clinton
20 SET NO. One

21
22 Pursuant to Rule 36 of the Federal Rules of Civil Procedure, Defendant Will
23 Adams requests that Plaintiff George Clinton respond to the following Requests for
24 Admission within 30 days of service.

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1 **REQUEST NO. 1:**

2 Admit that YOU authorized the use of a sample of the sound recording “(Not
3 Just) Knee Deep” in the Black Eyed Peas’ song “Shut The Phunk Up Remix.” (As
4 used in these requests for admission, the terms “YOU” and “YOUR” shall mean and
5 refer to Plaintiff George Clinton.)

6
7 **REQUEST NO. 2:**

8 Admit that YOU spoke with Eban Kelly regarding a license for the use of the
9 sound recording “(Not Just) Knee Deep” in the Black Eyed Peas’ song “Shut the
10 Phunk Up Remix.”

11
12 **REQUEST NO. 3:**

13 Admit that YOU authorized Eban Kelly to negotiate on YOUR behalf regarding
14 a license for the use of the sound recording “(Not Just) Knee Deep” in the Black Eyed
15 Peas’ song “Shut the Phunk Up Remix.”

16
17 **REQUEST NO. 4:**

18 Admit that YOU authorized Eban Kelly to communicate to representatives of
19 the Black Eyed Peas that YOU agreed to the terms of a license for use of the sound
20 recording “(Not Just) Knee Deep” in the Black Eyed Peas’ song “Shut the Phunk Up
21 Remix.”

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23 **REQUEST NO. 5:**

24 Admit that in 2009, Eban Kelly was authorized to negotiate on YOUR behalf
25 for licenses to use sound recordings owned by YOU.

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1 **REQUEST NO. 6:**

2 Admit that YOU executed the LICENSE AGREEMENT. (The term "LICENSE
3 AGREEMENT" shall mean and refer to that license agreement attached hereto as
4 Exhibit A.)

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6 **REQUEST NO. 7:**

7 Admit that YOU approved the terms of the LICENSE AGREEMENT.
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9 **REQUEST NO. 8:**

10 Admit that YOU authorized Eban Kelly to tell representatives of the Black Eyed
11 Peas that YOU agreed to the terms of the LICENSE AGREEMENT.
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13 **REQUEST NO. 9:**

14 Admit that YOU authorized the execution of the LICENSE AGREEMENT on
15 YOUR behalf.
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17 **REQUEST NO. 10:**

18 Admit that the song "Shut the Phunk Up Remix" contains a licensed sample of
19 the sound recording "(Not Just) Knee Deep."
20

21 **REQUEST NO. 11:**

22 Admit that the song "Shut Up Remix" contains a licensed sample of the sound
23 recording "(Not Just) Knee Deep."
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25 **REQUEST NO. 12:**

26 Admit that YOU are a member of C Kunspyrhzy, LLC.
27
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1 **REQUEST NO. 13:**

2 Admit that YOU have an ownership interest in C Kunspyruhzy, LLC.

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4 **REQUEST NO. 14:**

5 Admit that, in 2009, YOU authorized your son to sign contracts on YOUR
6 behalf.

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8 **REQUEST NO. 15:**

9 Admit that defendants used the sound recording “(Not Just) Knee Deep” with
10 YOUR permission.

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12 **REQUEST NO. 16:**

13 Admit that defendant Cherry Lane Music Publishing Company, Inc. did not
14 know that the song “Shut Up Remix” included an unauthorized sample of the sound
15 recording “(Not Just) Knee Deep.”

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17 **REQUEST NO. 17:**

18 Admit that defendant Cherry Lane Music Publishing Company, Inc. did not
19 know that the song “Shut The Phunk Up Remix” included an unauthorized sample of
20 the sound recording “(Not Just) Knee Deep.”

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22 **REQUEST NO. 18:**

23 Admit that defendant George Pajon did not know that the song “Shut Up
24 Remix” included an unauthorized sample of the sound recording “(Not Just) Knee
25 Deep.”

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1 **REQUEST NO. 19:**

2 Admit that defendant George Pajon did not know that the song “Shut The
3 Phunk Up Remix” included an unauthorized sample of the sound recording “(Not
4 Just) Knee Deep.”

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6 **REQUEST NO. 20:**

7 Admit that defendant El Cubano Music, Inc. did not know that the song “Shut
8 Up Remix” included an unauthorized sample of the sound recording “(Not Just) Knee
9 Deep.”

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11 **REQUEST NO. 21:**

12 Admit that defendant El Cubano Music, Inc. did not know that the song “Shut
13 The Phunk Up Remix” included an unauthorized sample of the sound recording “(Not
14 Just) Knee Deep.”

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16 **REQUEST NO. 22:**

17 Admit that defendant EMI Blackwood Music, Inc. did not know that the song
18 “Shut Up Remix” included an unauthorized sample of the sound recording “(Not Just)
19 Knee Deep.”

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21 **REQUEST NO. 23:**

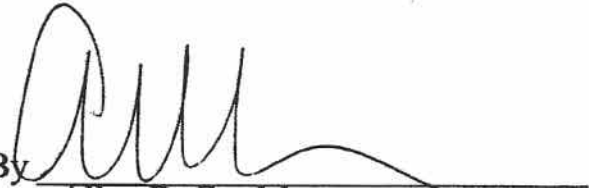
22 Admit that defendant EMI Blackwood Music, Inc. did not know that the song
23 “Shut The Phunk Up Remix” included an unauthorized sample of the sound recording
24 “(Not Just) Knee Deep.”

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Dated: November 9, 2011

GRODSKY & OLECKI LLP

By 
Allen B. Grodsky

Attorneys for Defendants Will Adams,
Jaime Gomez, Allan Pineda, Stacy
Ferguson, will.i.am music, inc., Tab
Magnetic, Inc., and Cherry Lane Music
Publishing Company, Inc.

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

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 2001 Wilshire Blvd, Ste. 210, Santa Monica, California 90403.

On November 9, 2011, I served the foregoing document described as: **FIRST SET OF REQUESTS FOR ADMISSION PROPOUNDED BY DEFENDANT WILL ADAMS TO PLAINTIFF GEORGE CLINTON** on the parties in this action by serving:

PLEASE SEE ATTACHED SERVICE LIST

(X) By Envelope - by placing () the original (X) a true copy thereof enclosed in sealed envelopes addressed as above and delivering such envelopes:

(XXX) By Mail: As follows: I am "readily familiar" with this firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. postal service on that same day with postage thereon fully prepaid at Santa Monica, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

() By Personal Service: I delivered such envelope by hand to the offices of the addressee(s).

(XXX) By Federal Express: I caused the envelope(s) to be delivered to the Federal Express depository at 2001 Wilshire Blvd., Santa Monica, California 90403, on November 9, 2011, for delivery on the next-business-day basis to the offices of the addressee(s).

() By Facsimile Transmission: On _____, I caused the above-named document to be transmitted by facsimile transmission, from fax number 310.315.1557, to the offices of the addressee(s) at the facsimile number(s) so indicated above. The transmission was reported as complete and without error. A copy of the transmission report properly issued by the transmitting facsimile machine is attached hereto.

Executed on November 9, 2011, at Santa Monica, California.

(X) FEDERAL I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.


MARIA D. WILSON

SERVICE LIST

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1 From Please print and press hard
 Date 11-9-11 Sender's FedEx Account Number 2757-9284-5
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 Address 2001 WILSHIRE BLVD STE 210
 City SANTA MONICA State CA ZIP 90403

2 Your Internal Billing Reference
 First 24 characters will appear on invoice. 7179-000

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4a Express Package Service To add SATURDAY Delivery, see Section 6. *Packages up to 100 lbs. ** To meet location.*
 FedEx Priority Overnight FedEx Standard Overnight FedEx First Overnight
Next business morning. Next business afternoon. Earliest next business morning delivery to select locations.

FedEx 2Day FedEx Express Saver
Second business day. Third business day. FedEx Savings rate not available. Minimum charge: One-pound rate.

4b Express Freight Service To add SATURDAY Delivery, see Section 6. *Packages over 150 lbs. ** To meet location.*
 FedEx 1Day Freight* FedEx 2Day Freight FedEx 3Day Freight
Next business day. Second business day. Third business day.

5 Packaging * Declared value limit (DVL)
 FedEx Envelope* FedEx Pak* FedEx Box FedEx Tube Other
Includes FedEx Small Pak, FedEx Large Pak, and FedEx Sturdy Pak.

6 Special Handling Include FedEx address in Section 3.
 SATURDAY Delivery Available ONLY for FedEx Priority Overnight, FedEx 2Day, FedEx 1Day Freight, and FedEx 2Day Freight to select ZIP codes.
 HOLD Weekday at FedEx Location NOT Available for FedEx First Overnight.
 HOLD Saturday at FedEx Location Available ONLY for FedEx Priority Overnight and FedEx 2Day to select locations.
 Does this shipment contain dangerous goods? See back must be checked.
 No Yes Yes Dry Ice Cargo Aircraft Only
As per attached Shipper's Declaration. Shipper's Declaration not required. Dry Ice, 5, UN 1845, x, kg.
 Dangerous goods (including dry ice) cannot be shipped in FedEx packaging.

7 Payment Bill to:
 Sender Recipient Third Party Credit Card Cash/Check
Enter FedEx Acct. No. or Credit Card No. below. Acct. No. in Section 1 will bill.

FedEx Acct. No. _____ Exp. Date _____
 Credit Card No. _____
 Total Packages _____ Total Weight _____ Total Declared Value* \$ _____ .00
*Our liability is limited to \$100 unless you declare a higher value. See back for details. FedEx Use Only

8 NEW Residential Delivery Signature Options If you require a signature, check Direct or Indirect.
 No Signature Required Direct Signature Indirect Signature
Package may be left without obtaining a signature for delivery. Fee applies. Anyone at recipient's address may sign for delivery. Fee applies. If no one is available at recipient's address, anyone at a neighboring address may sign for delivery. Fee applies.

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1 From Print and keep for hand.
 Date **11-9-11** Sender's FedEx Account Number **2757-9284-5**

Sender's Name **Allen Grodsky** Phone **(310) 315-3009**

Company **GRODSKY & OLECKI LLP**

Address **2001 WILSHIRE BLVD STE 210**

City **SANTA MONICA** State **CA** ZIP **90403**

2 Your Internal Billing Reference **7179-000**

3 To Recipient's Name **Jeffrey Thennisch**

Company **Dobrusin & Thennisch**

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4a Express Package Service To add SATURDAY Delivery, see Section 5. **Packages up to 150 lbs.**

FedEx Priority Overnight FedEx Standard Overnight FedEx First Overnight
 FedEx 2Day FedEx Express Saver
 FedEx First Overnight

4b Express Freight Service To add SATURDAY Delivery, see Section 5. **Packages over 150 lbs.**

FedEx 1Day Freight* FedEx 2Day Freight FedEx 3Day Freight

5 Packaging FedEx Envelope* FedEx Pak* FedEx Box FedEx Tube Other

6 Special Handling SATURDAY Delivery Available ONLY for FedEx Priority Overnight, FedEx 2Day, FedEx 1Day Freight, and FedEx 2Day Freight to select ZIP codes. HOLD Saturday at FedEx Location Available ONLY for FedEx Priority Overnight and FedEx 2Day to select locations.

No Yes Yes Dry Ice Cargo Aircraft Only

7 Payment Sender Recipient Third Party Credit Card Cash/Check

| FedEx Acct. No. / Credit Card No. | Exp. Date |
|-----------------------------------|-----------------------|
| Total Packages | Total Weight |
| | Total Declared Value* |
| | \$.00 |

*Your liability is limited to \$500 unless you declare a higher value. See back for details. FedEx Use Only

8 NEW Residential Delivery Signature Options If you require a signature, check Direct or Indirect.

No Signature Required Direct Signature Indirect Signature

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