

DECLARATION OF ALLEN B. GRODSKY

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2 I, Allen B. Grodsky, declare as follows:

3 1. I am an attorney at law, duly admitted to practice before this Court and
4 am a partner of Grodsky & Olecki LLP, counsel of record for defendants Will Adams,
5 Allan Pineda, Jaime Gomez, Stacy Ferguson, will.i.am music, inc., and Tab Magnetic,
6 Inc., defendants herein. I have firsthand, personal knowledge of the matters stated
7 herein and, if called as a witness, would and could competently testify thereto.

8 2. Attached hereto as Exhibit 7 is a true and correct copy of Plaintiff George
9 Clinton's Rule 26(a)(1) Initial Disclosures, served on or about May 9, 2011. Plaintiff
10 has not supplemented these disclosures.

11 3. Plaintiff has not produced any documents in this case as part of his
12 Rule 26 disclosures.

13 4. Plaintiff has never provided any damages computation nor has he not
14 made available for inspection and copying documents and/or evidentiary material on
15 which any such computation has been made.

16 5. Plaintiff never designated any experts or served any expert witness
17 reports. Pursuant to the Court's Scheduling and Case Management Order, parties
18 were obligated to designate affirmative experts and exchange expert witness reports
19 not later than eight weeks prior to discovery cut off, and designate rebuttal experts and
20 exchange rebuttal expert reports not later than five weeks prior to discovery cut off.
21 On December 11, 2011, the Court entered an order setting discovery cut off for
22 February 29; accordingly, expert designation and reports had to be disclosed by
23 January 4, 2012 and rebuttal expert designation and reports had to be disclosed by
24 Janaury 25, 2012.

25 6. Attached hereto as Exhibit 9 is a true and correct copy of pertinent pages
26 of the responses of Defendant UMG Recordings, Inc. to requests for production
27 served on or about October 31, 2011.

28 7. Attached hereto as Exhibit 10 is a true and correct copy of pertinent pages

1 of Will Adams's responses to requests for production served by mail on November 7,
2 2011.

3 8. Attached hereto as Exhibit 11 is a true and correct copy of a letter, dated
4 November 14, 2011, which I sent to Jeffrey P. Thennisch, counsel for Plaintiff. I
5 never received any response from Mr. Thennisch to the proposed protective order, nor
6 did he ever submit any different proposed protective order. Plaintiff never filed any
7 motion to compel further responses to the requests for production.

8 9. Attached hereto as Exhibit 12 is a true and correct copy of pertinent pages
9 of Clinton's responses to requests for admission, served on or about February 10,
10 2012.

11 10. Attached hereto as Exhibit 8 is a true and correct copy of pertinent pages
12 of the request for production of documents served by Defendant Adams on or about
13 October 31, 2011. I agreed to extend Clinton's time to respond to those requests to
14 January 4, 2012.

15 11. Attached hereto as Exhibit 14 is a true and correct copy of pertinent pages
16 of Clinton's responses to the requests for production served on February 29, 2012, the
17 date of discovery cutoff. Clinton has not produced any documents in response to
18 Defendants' request for production of documents.

19 I declare under penalty of perjury under the laws of the United States that the
20 foregoing is true and correct and that this declaration is executed in Santa Monica,
21 California, on March 6, 2012.

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// Allen B. Grodsky //
Allen B. Grodsky

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