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Attorney 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, et al.

Defendants.

Case No. CV 10-09476-ODW-PLA

The Honorable Otis S. Wright II

**DECLARATION OF GEORGE
CLINTON**

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DECLARATION OF GEORGE CLINTON

I, George Clinton, declare under penalty of perjury of the laws of the State of California as follows:

1. I am an individual resident of the City of Tallahassee, State of Florida, and the plaintiff in the above-captioned action. I have personal information on the topics at issue in this action, can testimony in this action, and hereby state and affirm as follows:

2. I am the legal owner of certain Funkadelic sound recordings, including "(Not Just) Knee Deep", and pursuant to Honorable Manuel Real's 2005 bench trial ruling, I am the only person authorized to grant licenses for use of this sound recording.

3. At no time in the past (including for any issue relating to the present legal action for the musical work, Not Just Knee Deep) have I ever appointed, authorized, or allowed Eban Kelly, Ian Allen, or any of either of the associated entities for these individuals, to function as my agent or other authorized representative having either the permission or authority to grant any type of license, permission, or consent to any third party whatsoever to use or sample my musical works in any capacity or reuse, including Not Just Knee Deep.

4. Absolutely none of the named Defendants have ever received any type of license, permission, or consent from me in any form which would have given the Defendants any type of belief or assurance, reasonable or otherwise, that they had any type of authority, license, consent, or permission to use or utilize any of my musical works or sound recordings, including the Not Just Knee Deep work at issue in this case.

5. On or about May 7, 2009, I was contacted by Eban Kelly about a third party seeking a license to utilize "Not Just Knee Deep" in a work by the Black

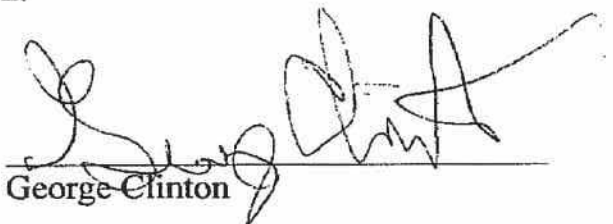
1 Eyed Peas musical group. I rejected this overture and no such license was made or
2 agreed to at anytime.

3
4 6. In August, 2009, I directed Carlon Scott a/k/a Carlon Thompson, a
5 member of me management team, to send Will Adams p/k/a Will I Am a text
6 expressing to him that I wanted to speak to him to work out the particulars
7 regarding a license for Not Just Knee Deep and that once we worked out the
8 agreement, our attorneys would write up the license. However, that meeting did
9 not take place as anticipated.
10

11
12 7. Thereafter, I turned the matter over to my former legal counsel, Robert
13 Allan. My counsel then initiated discussions with Defendants, and we received a
14 purported executed licensing agreement from Defendants in response. It was the
15 first time I had seen any purported licensing agreement bearing my signature and
16 that signature is a forgery. I did not sign any documents nor did I authorize anyone
17 to sign any documents on my behalf.
18

19
20 I have personal knowledge of the facts set forth above and I could and would
21 testify as to the facts set forth above if called as a witness.

22
23 Executed this 19 day of March, 2012.

24
25
26 
George Clinton