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6 Attorneys for Defendants Adams, Pineda,  
 Gomez, Ferguson, will.i.am music, inc.  
 7 and Tab Magnetic, Inc.

8 *(Additional counsel listed on*  
*second page)*  
 9

10 UNITED STATES DISTRICT COURT  
 11 CENTRAL DISTRICT OF CALIFORNIA

13 GEORGE CLINTON, an individual, )

14 Plaintiff, )

15 v. )

16 WILL ADAMS, p/k/a will.i.am, )  
 individually and d/b/a WILL.IAM MUSIC )  
 17 PUBLISHING, an individual; ALLAN )  
 PINEDA, p/k/a apl.de.ap, individually and )  
 18 d/b/a JEEPNEY MUSIC PUBLISHING, )  
 an individual; JAIME GÓMEZ, p/k/a )  
 19 Taboo, individually and d/b/a NAWASHA )  
 NETWORKS PUBLISHING, an )  
 20 individual; STACY FERGUSON, p/k/a )  
 Fergie, an individual; GEORGE PAJON, )  
 21 JR., an individual; JOHN CURTIS, an )  
 individual; UNIVERSAL MUSIC )  
 22 GROUP, INC., a Delaware corporation; )  
 UMG RECORDINGS, INC., a Delaware )  
 23 corporation; WILL I AM MUSIC, INC., a )  
 California corporation; CHERRY LANE )  
 24 MUSIC PUBLISHING COMPANY, INC., )  
 a New York corporation; EL CUBANO )  
 25 MUSIC, INC., a California corporation; )  
 EMI BLACKWOOD MUSIC INC., a )  
 26 Connecticut corporation; TAB )  
 MAGNETIC, INC., a California )  
 27 corporation; and DOES 1 through 10, )

28 Defendants. )

Case No. CV 10-9476 ODW (PLAx)

Honorable Otis D. Wright II, Ctrm 11

**JOINT PROPOSED SPECIAL  
 VERDICT FORM**

Trial: June 5, 2012  
 Time: 9:00 a.m.  
 Place: Courtroom 11

1 JEFFREY P. THENNISCH  
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6 Attorney for Plaintiff  
George Clinton  
7

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12 Facsimile: (213) 629-9022

13 Attorneys for Defendant  
UMG Recordings, Inc.  
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1 Pursuant to Local Rule 49-1 and the Court's Scheduling and Case Management  
2 Order dated April 29, 2011 (Dkt. 38), Plaintiff and Defendants submit the following  
3 Joint Proposed Special Verdict Form.

4 Plaintiff and Defendants reserve the right to modify this proposed special verdict  
5 form in response to the Court's ruling on the motion for partial summary judgment  
6 filed by Defendants Adams, Pineda, Gomez, Ferguson, will.i.am music, inc. and Tab  
7 Magnetic, Inc.

8 Respectfully submitted,

9  
10 Dated: April 30, 2012

GRODSKY & OLECKI LLP  
Allen B. Grodsky  
John Metzidis

11  
12 By: /s/ Allen B. Grodsky

13 Allen B. Grodsky

14  
15 Attorneys for Defendants  
Adams, Pineda, Gomez, Ferguson, will.i.am  
16 music, inc., and Tab Magnetic, Inc.

17 Dated: April 30, 2012

DOBRUSIN THENNISCH, PC  
Jeffrey P. Thennisch

18  
19 By: /s/ Jeffrey P. Thennisch (w/ permission)

20 Jeffrey P. Thennisch

21 Attorneys for Plaintiff George Clinton

22 Dated: April 30, 2012

CALDWELL, LESLIE & PROCTOR PC  
Linda M. Burrow  
Alison Mackenzie

23  
24  
25 By: /s/ Linda M. Burrow (w/ permission)

26 Linda M. Burrow

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28 Attorneys for Defendant UMG Recordings, Inc.

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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

GEORGE CLINTON,  
Plaintiff,  
v.  
WILLIAM ADAMS et al.  
Defendants.

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) Case No. CV 10-9476 ODW (PLAx)  
)  
) Honorable Otis D. Wright II, Ctrm 11  
)  
) **SPECIAL VERDICT**  
)  
) Trial: June 5, 2012  
) Time: 9:00 a.m.  
) Place: Courtroom 11

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We, the jury in the above-entitled cause, find the following on the questions submitted to us:

**I. Defendants' Affirmative Defense of Express License**

1. Did the defendants prove by preponderance of the evidence that they obtained a valid license to use the sound recording (*Not Just Knee Deep*)?

Yes \_\_\_\_\_ No \_\_\_\_\_

**If you answer "yes," please skip the remaining questions and sign and date this verdict form. If you answer "no," please proceed to Question 2.**

**II. Plaintiff's Claims of Copyright Infringement**

2. Did the plaintiff prove by preponderance of the evidence that he is the owner of a valid copyright in the sound recording (*Not Just Knee Deep*)?

Yes \_\_\_\_\_ No \_\_\_\_\_

**If you answer "yes," please proceed to Question 3. If you answer "no," please skip the remaining questions and sign and date this verdict form.**

1 **3.** For each one of the defendants listed below, please answer whether plaintiff  
2 proved by preponderance of the evidence that the defendant copied original  
3 elements from the sound recording (*Not Just) Knee Deep?*  
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5 **a.** Defendant William Adams Yes \_\_\_\_\_ No \_\_\_\_\_

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7 **b.** Defendant Allan Pineda Yes \_\_\_\_\_ No \_\_\_\_\_

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9 **c.** Defendant Jaime Gomez Yes \_\_\_\_\_ No \_\_\_\_\_

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11 **d.** Defendant Stacy Ferguson Yes \_\_\_\_\_ No \_\_\_\_\_

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13 **e.** Defendant will.i.am music, inc. Yes \_\_\_\_\_ No \_\_\_\_\_

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15 **f.** Defendant Tab Magnetic, Inc. Yes \_\_\_\_\_ No \_\_\_\_\_

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17 **g.** Defendant UMG Recordings, Inc. Yes \_\_\_\_\_ No \_\_\_\_\_

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19 **Please proceed to Question 4.**  
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1 **III. Plaintiff's Actual Damages**

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3 **4.** Did plaintiff prove by preponderance of the evidence that he suffered any actual

4 damages as a result of the defendants' infringement?

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6 Yes \_\_\_\_\_ No \_\_\_\_\_

7

8 **If you answer "yes," please proceed to Question 5. If you answer "no,"**

9 **please proceed to Question 6.**

10

11 **5.** What is the amount of actual damages that the plaintiff suffered as a result of the

12 defendants' infringement?

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16 **Please proceed to Question 6.**

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1 **IV. Each Defendant's Profits**

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3 **6.** For each defendant, what are the gross revenues, if any, received by that

4 defendant from sales of the infringing work?

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6

<b>Defendant</b>	<b>Revenues</b>
William Adams	\$ _____
Allan Pineda	\$ _____
Jaime Gomez	\$ _____
Stacy Ferguson	\$ _____
will.i.am music, inc.	\$ _____
Tab Magnetic, Inc.	\$ _____
UMG Recordings, Inc.	\$ _____

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15 **Please proceed to Question 7.**

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7. For each defendant, what are the expenses, if any, incurred by that defendant in connection with sales of the infringing work?

<b>Defendant</b>	<b>Expenses</b>
William Adams	\$ _____
Allan Pineda	\$ _____
Jaime Gomez	\$ _____
Stacy Ferguson	\$ _____
will.i.am music, inc.	\$ _____
Tab Magnetic, Inc.	\$ _____
UMG Recordings, Inc.	\$ _____

**Please proceed to Question 8.**

8. For each defendant, what are the defendant's profits, if any, that are attributable to the infringement of the plaintiff's copyrighted work?

<b>Defendant</b>	<b>Profits</b>
William Adams	\$ _____
Allan Pineda	\$ _____
Jaime Gomez	\$ _____
Stacy Ferguson	\$ _____
will.i.am music, inc.	\$ _____
Tab Magnetic, Inc.	\$ _____
UMG Recordings, Inc.	\$ _____

**Please proceed to Question 9.**

**V. Statutory Damages**

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**9.** What amount do you award against the defendants as statutory damages?

\$ \_\_\_\_\_

**Please date, sign, and return this form.**

Dated: \_\_\_\_\_, 2012

\_\_\_\_\_  
Jury Foreperson