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16 Attorneys for Plaintiff
BRYAN PRINGLE

18 **UNITED STATES DISTRICT COURT**
19 **CENTRAL DISTRICT OF CALIFORNIA**
20 **SOUTHERN DIVISION**

21 BRYAN PRINGLE, an individual,) Case No. SACV 10-1656 JST(RZx)
22 Plaintiff,) **STIPULATION REQUESTING**
23 v.) **COURT TO CONTINUE EXPERT**
24 WILLIAM ADAMS, JR.; STACY) **DISCOVERY CUTOFF DATES**
25 FERGUSON; ALLAN PINEDA; and)
26 JAIME GOMEZ, all individually and)
collectively as the music group The Black)
27 Eyed Peas, *et al.*,)
Defendants.)

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1 This Stipulation is made by and among Plaintiff Bryan Pringle (“Plaintiff”)
2 and Defendants, William Adams, Stacy Ferguson, Allan Pineda, Jaime Gomez,
3 individually and collectively p/k/a The Black Eyed Peas, Tab Magnetic Publishing,
4 Headphone Junkie Publishing, LLC, will.i.am. music, llc, Jeepney Music, Inc.,
5 Cherry River Music Co., EMI April Music, Inc., UMG Recordings, Inc., Interscope
6 Records, Shapiro, Bernstein & Co., Inc., Frederic Riesterer, and David Guetta
7 (jointly “Defendants”) (Plaintiffs and Defendants are hereafter collectively referred
8 to as the “parties”), and is made with reference to the following facts:

9 1. WHEREAS, pursuant to Rule 26(a)(2)(D), the date by which expert
10 disclosures must be made is currently November 30, 2011, and the date by which
11 rebuttal expert disclosures must be made is currently December 30, 2011.

12 2. WHEREAS, pursuant to this Court’s February 24, 2011 Scheduling Order,
13 all fact and expert discovery must be completed by November 14, 2011.

14 3. WHEREAS, the parties have agreed, subject to this Court’s approval, to
15 shorten the time by which initial expert disclosures must be made to November 23,
16 2011, and to shorten the time by which rebuttal expert disclosures must be made –
17 including Defendants’ report(s), if any, on costs and net profits attributable to the
18 alleged infringement (including but not limited to, the apportionment of such profits),
19 to December 16, 2011.

20 4. WHEREAS, the parties have further agreed, subject to this Court’s
21 approval, to extend the date by which expert discovery must be completed to January
22 6, 2012.

23 5. WHEREAS, with the exception of the deadlines by which the parties must
24 make their initial and rebuttal expert disclosures, and the deadline by which expert
25 discovery must be completed, no other deadlines, including but not limited to the
26 trial date, will be affected by this Stipulation.

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1 BASED UPON THE FOREGOING FACTS, IT IS HEREBY STIPULATED
2 by and between the parties, through their respective counsel, subject to the Court's
3 approval, that:

4 (a) Initial Expert Disclosures must be made on or before November 23,
5 2011;

6 (b) Rebuttal Expert Disclosures – including Defendants' rebuttal
7 disclosures, if any, on costs and net profits attributable to the alleged infringement
8 (including but not limited to, the apportionment of such profits) must be made on or
9 before December 16, 2011; and

10 (c) The deadline by which to complete expert discovery shall be continued
11 from November 14, 2011 to January 6, 2012.

12
13 Dated: October 25, 2011

Dean A. Dickie (appearing Pro Hac Vice)
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21 By: /s/ Dean Dickie
Attorneys for Plaintiff BRYAN PRINGLE

22
23
24 Dated: October 25, 2011

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

27 By: /s/ Linda Burrow
Attorneys for Defendants UMG RECORDINGS,
28 INC., and INTERSCOPE RECORDS

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Dated: October 25, 2011

Donald Miller
Barry Slotnick
Tal Dickstein
LOEB & LOEB LLP

By: /s/ Donald Miller
Attorneys for Defendants DAVID GUETTA,
FREDERIC RIESTERER and
SHAPIRO, BERNSTEIN AND CO., INC.

Dated: October 25, 2011

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Jonathan Pink
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Mariangela Seale
BRYAN CAVE LLP

By: /s/ Kara Cenar
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FERGUSON p/k/a FERGIE all individually and
collectively as the music group THE BLACK
EYED PEAS; will.i.am music, llc; TAB
MAGNETIC PUBLISHING; HEADPHONE
JUNKIE PUBLISHING, LLC, CHERRY RIVER
MUSIC CO.; JEEPNEY MUSIC, INC., EMI
APRIL MUSIC

CERTIFICATE OF SERVICE

1 On October 25, 2011, I electronically filed the foregoing STIPULATION
2 REQUESTING COURT TO CONTINUE EXPERT DISCOVERY CUTOFF
3 DATES using the CM/ECF system which will send notification of such filing to the
4 following registered CM/ECF Users:

5
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27 I am unaware of any attorneys of record in this action who are not registered
28 for the CM/ECF system or who did not consent to electronic service.

 I certify under penalty of perjury under the laws of the United States of
America that the foregoing statements are true and correct.

Dated: October 25, 2011 /s/Colin C. Holley

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