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11 Attorneys for Defendants
WILLIAM ADAMS; STACY FERGUSON; ALLAN PINEDA; and JAIME
12 GOMEZ, all individually and collectively as the music group THE BLACK EYED
PEAS; will.i.am music, llc; TAB MAGNETIC PUBLISHING; CHERRY RIVER
13 MUSIC CO.; HEADPHONE JUNKIE PUBLISHING, LLC; JEEPNEY MUSIC,
INC.; EMI APRIL MUSIC, INC.

14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION**

16 BRYAN PRINGLE, an individual,

17 Plaintiff,

18 v.

19 WILLIAM ADAMS, JR.; STACY
FERGUSON; ALLAN PINEDA; and
20 JAIME GOMEZ, all individually and
collectively as the music group the
21 Black Eyed Peas; DAVID GUETTA;
FREDERICK RIESTERER; UMG
22 RECORDINGS, INC.; INTERSCOPE
RECORDS; EMI APRIL MUSIC,
23 INC.; HEADPHONE JUNKIE
PUBLISHING, LLC; WILL.I.AM.
24 MUSIC, LLC; JEEPNEY MUSIC,
INC.; TAB MAGNETIC
25 PUBLISHING; CHERRY RIVER
MUSIC CO.; SQUARE RIVOLI
26 PUBLISHING; RISTER EDITIONS;
and SHAPIRO, BERNSTEIN & CO.,

27 Defendants.
28

Case No. SACV10-01656 JST (RZx)

Hon. Ralph Zarefsky
Courtroom 540

[DISCOVERY MATTER]

**NOTICE OF MOTION AND
MOTION BY DEFENDANTS TO
COMPEL SUPPLEMENTAL
RESPONSES BY PLAINTIFF
BRYAN PRINGLE TO
INTERROGATORIES AND FOR
MONETARY SANCTIONS**

Date: January 23, 2012
Time: 10:00 a.m.
Courtroom: 540

Disc. Cut-Off: November 14, 2011
Pretrial Conf.: February 13, 2012
Trial Date: February 28, 2012

1 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 PLEASE TAKE NOTICE that on January 23, 2012, 10:00 a.m., or as soon
3 thereafter as the matter may be heard by the above-entitled Court, located at the 255
4 East Temple Street, Los Angeles, California, in Courtroom 540, before the
5 Honorable Ralph Zarefsky, defendants William Adams; Stacy Ferguson; Allan
6 Pineda; and Jaime Gomez, all individually and collectively known as the music
7 group The Black Eyed Peas; will.i.am music, llc; Tab Magnetic Publishing; Cherry
8 River Music Co.; Headphone Junkie Publishing, LLC; Jeepney Music, Inc.; EMI
9 April Music, Inc. (collectively, "Defendants") will, and hereby do, move the Court
10 for entry of an order compelling Plaintiff Bryan Pringle ("Plaintiff") to provide
11 further responses to interrogatories propounded by Defendant Stacy Ferguson and
12 Defendant Headphone Junkie Publishing, LLC, to strike or otherwise overrule
13 Plaintiff's meritless objections to certain interrogatories, and for an award of
14 sanctions for the attorneys' fees to bring this Motion in the amount of \$15,000.00.

15 This Motion is based on the points and authorities set forth in the Parties'
16 Joint Stipulation re: Defendants Motion to Compel Supplemental Responses by
17 Plaintiff Bryan Pringle to Interrogatories and for Monetary Sanctions, and is based
18 on this Notice and Motion, the Joint Stipulation, the Declarations submitted on
19 behalf of Plaintiff and Defendants, and the exhibits attached thereto, all pleadings
20 and papers on file in this action, all other matters of which the Court may take
21 notice, and such other and further matters as may be presented to the Court. This
22 Motion and is made after the conference of counsel pursuant to Local Rule 37-1 and
23 37-2.

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Dated: November 16, 2011

Kara Cenar
Jonathan Pink
BRYAN CAVE LLP

By: /s/ Jonathan Pink
Jonathan Pink
Attorneys for Defendants
WILLIAM ADAMS; STACY
FERGUSON; ALLAN PINEDA; and
JAIME GOMEZ, all individually and
collectively as the music group THE
BLACK EYED PEAS; will.i.am music,
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APRIL MUSIC, INC.

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