



Justin Righettini
 Direct: (949) 223-7213
 justin.righettini@bryancave.com

June 6, 2011

VIA E-MAIL

Katharine Dunn
 MILLER CANFIELD PADDOCK
 AND STONE, P.L.C.
 225 West Washington Street, Suite 2600
 Chicago, IL 60606

Re: Pringle v. Adams, et al.

Dear Katharine:

Thank you for taking the time to discuss with us Plaintiff's responses to William Adams' First Set of Request for Production of Documents and Things on June 2, 2011. This letter serves to confirm that, in our meeting, you stated that Mr. Pringle currently has no additional responsive documents and/or things in his possession, custody, or control beyond those which had already been produced at the time of our meet and confer. You did, however, indicate that Mr. Pringle is still conducting a search to determine if additional responsive documents and things do exist. Please have Mr. Pringle complete that search as soon as possible, but no later than June 17, 2011. To the extent Mr. Pringle fails to produce additional documents or things by that time, Defendants will assume that no such additional documents or things exist, and will rely on that assumption in connection with any dispositive motions (including a motion for summary judgment) that may follow.

In addition, you indicated that Mr. Pringle would make available for inspection various computer files and musical equipment, and that you would get back to us shortly with a proposal concerning logistics thereof. Please provide such a proposal, including proposed dates and the location for that inspection, by June 17, 2011. Beyond the musical equipment and computer software and hardware Mr. Pringle claims to have used, please confirm that Mr. Pringle will make available for inspection each and every digital file, phonorecord, or copy that corresponds to every version of "Take a Dive" (and sound recordings thereof) that he claims ever existed, including

Bryan Cave LLP
 3161 Michelson Drive
 Suite 1500
 Irvine, CA 92612-4414
 Tel (949) 223-7000
 Fax (949) 223-7100
 www.bryancave.com

Bryan Cave Offices

Atlanta
 Charlotte
 Chicago
 Dallas
 Hamburg
 Hong Kong
 Irvine
 Jefferson City
 Kansas City
 London
 Los Angeles
 Milan
 New York
 Paris
 Phoenix
 San Francisco
 Shanghai
 Singapore
 St. Louis
 Washington, DC

Bryan Cave International Trade
 A TRADE CONSULTING SUBSIDIARY
 OF NON-LAWYER PROFESSIONALS

www.bryancavetrade.com
 Bangkok
 Beijing
 Jakarta
 Kuala Lumpur
 Manila
 Shanghai
 Singapore
 Tokyo


Katharine Dunn

June 6, 2011

Page 2

without limitation, the original 1998 version, the 1999 "Dance Version," and those versions that have the "guitar twang sequence" "soloed out as the introduction of the song."

Very truly yours,


Justin Righettoni

cc: Kara Cenar, Esq.
Jonathan Pink, Esq.
Barry Slotnick, Esq.
Linda Burrow, Esq.