

DEPOSITION OF WILLIAM ADAMS - 7/25/2011

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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA - SOUTHERN DIVISION

BRYAN PRINGLE, an individual, )  
)  
Plaintiff, )  
)

vs. ) Case No.  
) SACV 10-1656 JST(RZx)

WILLIAM ADAMS, JR.; STACY )  
FERGUSON; ALLAN PINEDA; and, )  
JAIME GOMEZ, all individually )  
and collectively as the music )  
group The Black Eyed Peas, )  
et al., )  
Defendants. )  
\_\_\_\_\_)

C O N F I D E N T I A L

(PURSUANT TO PROTECTIVE ORDER, THIS  
TRANSCRIPT HAS BEEN DEEMED  
"CONFIDENTIAL - ATTORNEYS' EYES ONLY")

DEPOSITION OF WILLIAM ADAMS  
(a/k/a "Will.i.am")

TAKEN ON MONDAY, JULY 25, 2011, AT 10:31 A.M.

REPORTED BY:

TRACY M. FOX

CSR NUMBER 10449

FOX AND ASSOCIATES COURT REPORTERS, INC. 949.870.5757

10:49:50 1 write songs?

10:49:50 2 A. I wrote a song last night.

10:49:52 3 Q. Okay. And did you write "I Gotta  
10:49:56 4 Feeling"?

10:49:56 5 A. The lyrical portion, yes.

10:49:59 6 Q. The entire lyrical portion?

10:50:06 7 A. Up and down.

10:50:07 8 Q. "Up and down" means yes, the entire  
10:50:08 9 portion?

10:50:08 10 A. Yes, up and down.

10:50:08 11 Q. Did any one of the other members of  
10:50:09 12 The Black Eyed Peas participate in your writing of  
10:50:11 13 the lyrics?

10:50:13 14 MS. CENAR: Objection to the form.

10:50:14 15 MR. GOULD: What's the problem with  
10:50:15 16 the form?

10:50:16 17 MS. CENAR: It's vague.

10:50:16 18 MR. GOULD: That's vague?

10:50:17 19 MS. CENAR: Yes.

10:50:18 20 MR. GOULD: Did any --

10:50:18 21 Read back the question, please.

10:50:19 22 THE DEPONENT: I heard it.

10:50:21 23 (SPEAKING SIMULTANEOUSLY.)

10:50:21 24 BY MR. GOULD:

10:50:21 25 No. But I -- listen, this is -- you

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10:50:21 1 know I have a --

10:50:21 2 A. I see it.

10:50:23 3 Q. Okay. Listen to me; okay?

10:50:24 4 Read back the question for the witness  
10:50:26 5 and Kara can tell me what's wrong with the form of it  
10:50:29 6 so that I can rephrase it.

10:50:32 7 Read back the question to Ms Cenar.

10:50:34 8 MS. CENAR: Counsel, I've given my  
10:50:35 9 objection.

10:50:36 10 MR. GOULD: I am -- I --

10:50:36 11 MS. CENAR: You don't need to read the  
10:50:36 12 question back for my benefit.

10:50:36 13 (SPEAKING SIMULTANEOUSLY.)

10:50:36 14 MR. GOULD: I'm entitled --

10:50:37 15 MS. CENAR: And the witness --

10:50:37 16 MR. GOULD: -- to an answer.

10:50:38 17 MS. CENAR: -- knows what the question  
10:50:38 18 is.

10:50:39 19 MR. GOULD: But you can't --

10:50:39 20 MS. CENAR: Would you like an answer  
10:50:42 21 from the witness or are you going to waste the time  
10:50:46 22 of this witness?

10:50:47 23 MR. GOULD: You can't --

10:50:47 24 MS. CENAR: If you are, we're going to  
10:50:47 25 terminate the deposition.

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10:50:49 1 MR. GOULD: If you want to terminate  
10:50:49 2 it, terminate it.

10:50:50 3 You can't just make objections --

10:50:51 4 MS. CENAR: I gave you my --

10:50:52 5 MR. GOULD: -- without any basis  
10:50:52 6 whatsoever, like the one you just gave, and not even  
10:50:52 7 tell the questioning attorney the basis of the  
10:50:59 8 objection.

10:50:59 9 The reason you don't want to answer is  
10:51:00 10 because there's no basis for it whatsoever, there's  
10:51:03 11 no form problem whatsoever, and you just persist and  
10:51:05 12 want to make objections for whatever reason you want  
10:51:08 13 to.

10:51:10 14 That's improper.

10:51:10 15 Now, if you want to terminate the  
10:51:11 16 deposition without giving me an answer, fine.

10:51:14 17 You can terminate it any time you  
10:51:15 18 want.

10:51:16 19 Read back the question now. I forgot  
10:51:17 20 it.

10:51:19 21 THE DEPONENT: Want me to repeat it?

10:51:22 22 BY MR. GOULD:

10:51:22 23 Q. Yeah, please.

10:51:23 24 A. Did any other Black Eyed Peas write  
10:51:25 25 any lyrics on "I Gotta Feeling"?

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10:51:28 1 Q. I didn't say it like that, but  
10:51:28 2 that's right.

10:51:28 3 A. Yes, I know.

10:51:28 4 Q. That's the question.

10:51:32 5 A. We have our -- once again, that's an  
10:51:36 6 internal group. I have to protect my group.

10:51:41 7 Q. You're not answering the question as  
10:51:43 8 to who wrote The Black Eyed Peas song?

10:51:46 9 A. I told you I wrote it.

10:51:47 10 Q. Okay. And I'm asking you: Did any  
10:51:48 11 other member of The Black Eyed Peas --

10:51:50 12 A. Then you should --

10:51:51 13 Q. -- participate in the writing?

10:51:52 14 No, I don't need to speak to someone  
10:51:54 15 else.

10:51:55 16 A. You should talk to --

10:51:56 17 Q. You have a duty to answer the  
10:51:57 18 question, and I'm asking you to answer the simple  
10:51:59 19 question that's clearly relevant for the reason you  
10:52:02 20 are already here.

10:52:03 21 There's nothing confidential about  
10:52:04 22 that. Please answer the question.

10:52:05 23 A. No. No. No, they didn't.

10:52:07 24 Q. Okay. Good.

10:52:17 25 Did you write any music with respect

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10:52:19 1 to "I Gotta Feeling"?

10:52:20 2 A. I just wrote the lyrical portion, like  
10:52:22 3 I said.

10:52:28 4 Q. Were you ever trained as a  
10:52:30 5 songwriter?

10:52:30 6 A. What does that mean?

10:52:33 7 Q. Did you have any formal training on  
10:52:34 8 how to write a song?

10:52:35 9 A. No one trained me to walk.

10:52:37 10 Q. The answer is no?

10:52:39 11 A. I don't even know anybody that had  
10:52:42 12 trained -- songwriting training.

10:52:43 13 Q. Okay. So you don't get songwriting  
10:52:45 14 training?

10:52:46 15 A. Who does?

10:52:47 16 MS. CENAR: Okay. Don't --

10:52:48 17 BY MR. GOULD:

10:52:48 18 Q. Just because I ask you a question  
10:52:50 19 doesn't mean I don't know the answer; okay?

10:52:50 20 MS. CENAR: Just listen to the  
10:52:51 21 question that he asks.

10:52:51 22 BY MR. GOULD:

10:52:51 23 Q. My job is to ask the questions. Your  
10:52:54 24 job is to answer the questions. We don't need to do  
10:52:57 25 anything else.

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11:59:03 1 So if they presented a track or a  
11:59:06 2 song and they say that "This is the universe and the  
11:59:08 3 gravity around it," that's what it is.

11:59:11 4 It's none of my business on how they  
11:59:13 5 configure it up or divvied it up or, you know, their  
11:59:16 6 understanding as songwriters. It's none of my  
11:59:18 7 business.

11:59:18 8 All I know is that they have an  
11:59:20 9 understanding.

11:59:21 10 BY MR. GOULD:

11:59:21 11 Q. What did David Guetta do?

11:59:24 12 A. I don't know.

11:59:24 13 Q. So as of right now, you don't know  
11:59:26 14 whether he wrote a beat for "I Gotta Feeling"?

11:59:28 15 A. I have no idea.

11:59:29 16 Q. You have no idea whether Fred  
11:59:32 17 Reisterer wrote a beat for "I Gotta Feeling"?

11:59:34 18 A. I wasn't there, no.

11:59:35 19 Q. Did you write a beat?

11:59:35 20 A. Nope. Sure didn't.

11:59:35 21 Q. Did you have anything to do with the  
11:59:36 22 music?

11:59:36 23 A. I had nothing to do with the music,  
11:59:38 24 just the lyrical portion.

11:59:40 25 Q. Just the lyrical portion?

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11:59:42 1 A. Just the lyrical portion. That's  
11:59:44 2 it.

11:59:45 3 Q. Okay. Can you tell me why  
11:59:47 4 David Guetta received royalties for "I Gotta Feeling"  
11:59:49 5 if you don't know what his relationship to the song  
11:59:52 6 is?

11:59:52 7 A. Because he presented that as something  
11:59:53 8 that he composed. And whether or not -- that's  
12:00:01 9 what he said, "I composed this." And he -- and  
12:00:04 10 whatever -- however he did it, whoever he had in the  
12:00:06 11 room, I wasn't there.

12:00:07 12 Q. Right. So you don't know whether he  
12:00:09 13 composed it?

12:00:10 14 When you say "he composed it," you are  
12:00:11 15 talking about the music?

12:00:16 16 Where did the music come from?

12:00:17 17 (SPEAKING SIMULTANEOUSLY.)

12:00:17 18 MR. HERTZ: Counsel, ask one  
12:00:18 19 question.

12:00:19 20 MS. CENAR: Objection; form.

12:00:19 21 BY MR. GOULD:

12:00:19 22 Q. Where did the music come from for  
12:00:22 23 "I Gotta Feeling"?

12:00:22 24 A. It came from David Guetta. He  
12:00:25 25 e-mailed it to me.



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12:00:26 1 Q. All right. And did you ever produce  
12:00:27 2 that e-mail to your counsel?

12:00:32 3 A. Yep.

12:00:32 4 Q. All right.

12:00:32 5 MS. CENAR: And it was produced to  
12:00:34 6 you, Counsel. And the actual disk with the musical  
12:00:37 7 piece was handed to you this morning and marked as an  
12:00:39 8 exhibit in this deposition.

12:00:41 9 BY MR. GOULD:

12:00:41 10 Q. All right. You received a disk from  
12:00:43 11 David Guetta?

12:00:43 12 A. Nope.

12:00:44 13 Q. You received an e-mail?

12:00:45 14 A. E-mail.

12:00:46 15 Q. What was on the e-mail? What was --  
12:00:49 16 what was sent to you via the e-mail?

12:01:01 17 MR. DICKSTEIN: Objection; form.

12:01:02 18 DEPOSITION OFFICER: Who was that?

12:01:02 19 MS. CENAR: That was Tal.

12:01:02 20 DEPOSITION OFFICER: Okay. Hang on.

12:01:02 21 THE DEPONENT: That's it

12:01:03 22 (indicating).

12:01:04 23 MR. GOULD: Could you read back the  
12:01:05 24 question.

12:01:05 25 THE DEPONENT: What was --

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12:01:05 1 MS. CENAR: Let the record reflect  
12:01:06 2 that the witness was pointing to a disk that's in  
12:01:10 3 Ira Gould's hand which we marked at the beginning of  
12:01:12 4 this deposition.

12:01:14 5 And I don't recall what number the  
12:01:15 6 court reporter assigned to that disk.

12:01:19 7 Could you read it off the disk? Ira,  
12:01:19 8 you have it in hand. Could you turn it --

12:01:21 9 MR. GOULD: I'm going to identify it  
12:01:23 10 shortly.

12:01:24 11 Would you ask the witness what the  
12:01:25 12 question -- tell the witness what the question was.

12:00:46 13 (THE RECORD WAS READ AS FOLLOWS:

12:00:46 14 Q. What was on the e-mail? What  
12:00:49 15 was -- what was sent to you via  
12:00:50 16 the e-mail?)

12:02:21 17 BY MR. GOULD:

12:02:21 18 Q. Is what was sent to you in the e-mail  
12:02:21 19 what I have in my hand right now?

12:02:21 20 A. Sure is.

12:02:21 21 MR. GOULD: Would you identify --  
12:02:21 22 would you mark this, please, as the next deposition  
12:02:21 23 exhibit in the case.

12:02:21 24 DEPOSITION OFFICER: Okay. It's  
12:02:21 25 already been assigned Exhibit 1A.

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12:02:21 1 MR. GOULD: Okay.

12:02:21 2 DEPOSITION OFFICER: I can either mark  
12:02:21 3 it or --

12:02:21 4 MS. CENAR: You can mark it as the  
12:02:21 5 next exhibit in the case.

12:02:21 6 DEPOSITION OFFICER: The next exhibit  
12:02:21 7 is 8.

12:02:21 8 (WHEREUPON, PLAINTIFF'S EXHIBIT NUMBER  
12:02:21 9 8 WAS MARKED FOR IDENTIFICATION BY  
12:02:21 10 THE DEPOSITION OFFICER.)

12:02:21 11 MS. CENAR: May I see the disk for a  
12:02:22 12 moment, please.

12:02:23 13 For the record, this is marked as  
12:02:25 14 "Feeling, David Pop" written on the front of the  
12:02:27 15 disk, and it's marked BEP-PR 1A and designated as  
12:02:32 16 "highly confidential."

12:02:36 17 BY MR. GOULD:

12:02:36 18 Q. All right. Is what you received in  
12:02:37 19 this e-mail?

12:02:38 20 A. Not the disk, just the file itself.

12:02:40 21 Q. All right. And did you listen to it  
12:02:42 22 when you received it?

12:02:43 23 A. Yes.

12:02:43 24 Q. And what did you think of it in terms  
12:02:45 25 of the quality of what you were listening to?

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15:50:19 1 MR. GOULD: Do you know --

15:50:20 2 MS. CENAR: -- of questioning as being

15:50:21 3 misleading. And I would ask you very strongly to

15:50:23 4 check your facts --

15:50:24 5 MR. GOULD: Thank you.

15:50:25 6 MS. CENAR: -- before you continue

15:50:26 7 with the questioning.

15:50:29 8 BY MR. GOULD:

15:50:29 9 Q. All right. Do you know anything about

15:50:30 10 that matter other than what you've testified to?

15:50:31 11 A. No.

15:50:32 12 Q. Okay. Does Interscope, if you know,

15:50:50 13 accept unsolicited music from third parties?

15:50:56 14 A. I don't know.

15:50:56 15 Q. Do you accept unsolicited music from

15:51:00 16 third parties?

15:51:03 17 A. No.

15:51:04 18 MS. CENAR: Objection to --

15:51:04 19 DEPOSITION OFFICER: I couldn't hear

15:51:05 20 you, Counsel.

15:51:11 21 MS. CENAR: I said "objection to

15:51:11 22 form."

15:51:11 23 DEPOSITION OFFICER: Thank you.

15:51:12 24 And your answer was?

15:51:13 25 THE DEPONENT: No.

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15:53:53 1 I know you didn't have anything to do  
15:53:55 2 with the music -- At least that's my understanding;  
15:53:57 3 correct?

15:53:59 4 MS. CENAR: Objection to the form.

15:54:01 5 THE DEPONENT: That's --

15:54:01 6 BY MR. GOULD:

15:54:01 7 Q. Is it true or not true that you had  
15:54:03 8 nothing to do with the music itself?

15:54:06 9 A. I had nothing do with the music at  
15:54:07 10 all.

15:54:08 11 Q. Okay. And I think you testified that  
15:54:09 12 you received the music in the form of a disk?

15:54:13 13 A. No.

15:54:14 14 Q. Excuse me. I'm sorry.

15:54:15 15 In the form of an attachment to an  
15:54:17 16 e-mail?

15:54:17 17 A. In the form of an e-mail.

15:54:19 18 Q. Okay. And when you played it, did you  
15:54:21 19 play it to yourself?

15:54:22 20 A. Yes.

15:54:22 21 Q. All right. Was anybody with you when  
15:54:24 22 you played it?

15:54:29 23 A. No.

15:54:29 24 Q. All right. And did you think that the  
15:54:30 25 music was excellent?

16:10:17 1 Q. And it's the "dah dah dah dah"

16:10:17 2 (indicating); right?

16:10:20 3 A. Yes.

16:10:20 4 Q. Is that -- was that inspirational to  
16:10:23 5 you?

16:10:24 6 (SPEAKING SIMULTANEOUSLY.)

16:10:24 7 THE DEPONENT: So the phone  
16:10:25 8 conversation went as such and --

16:10:27 9 MS. CENAR: He asked you a specific  
16:10:28 10 question.

16:10:28 11 BY MR. GOULD:

16:10:28 12 Q. No. No. The question is a specific  
16:10:28 13 question.

16:10:28 14 A. This is the answer.

16:10:30 15 Q. Okay.

16:10:32 16 MS. CENAR: Go ahead.

16:10:32 17 THE DEPONENT: The answer is this:  
16:10:32 18 I'm in Colorado. There's a guy by the name of Brad.  
16:10:37 19 Brad owns a company called Beatport.

16:10:41 20 BY MR. GOULD:

16:10:41 21 Q. Uh-huh.

16:10:41 22 A. Beatport's a DJ website where DJs  
16:10:45 23 download songs. Maybe some of them are members.  
16:10:48 24 Some of them steal them. They hack Beatport. Some  
16:10:51 25 of them buy it.

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16:10:54 1 So I paid a visit to Beatport. And I  
16:10:57 2 said, "Hey, Brad, do you know the guy who produced  
16:11:03 3 'Now That The Love Is Gone'? I want him to produce a  
16:11:06 4 song for The Black Eyed Peas. We're making our new  
16:11:09 5 record."

16:11:10 6 Brad said, "I'll put him on the phone  
16:11:12 7 right now."

16:11:14 8 I said, "You know that guy?"

16:11:15 9 "Yeah. He's a good friend of mine."

16:11:17 10 "Hello."

16:11:19 11 "Hi, my name is Will.i.am from The  
16:11:20 12 Black Eyed Peas."

16:11:21 13 "Hey, it's David Guetta."

16:11:22 14 "Hey, I love your song 'Now That The  
16:11:22 15 Love Is Gone.' Can you produce a song for The Black  
16:11:29 16 Eyed Peas that's similar to that?"

16:11:32 17 "Oh. You like 'Now That The Love Is  
16:11:33 18 Gone'? I like Black Eyed Peas."

16:11:37 19 I'm like, "Okay. You -- we would  
16:11:37 20 really like to collaborate with you."

16:11:40 21 Q. Okay.

16:11:40 22 A. "Here's my e-mail address."

16:11:43 23 "I have some beats. I'll send you  
16:11:44 24 some beats right now."

16:11:46 25 Right?

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16:11:47 1 He sent me a beat.

16:11:49 2 I said, "I'm flying home. Hopefully

16:11:51 3 you have some good beats."

16:11:53 4 He sent me beats to my e-mail

16:11:55 5 address.

16:11:55 6 Q. Yes.

16:11:55 7 A. I landed; got that track.

16:11:58 8 That song originally is a "Now That

16:12:00 9 The Love Is Gone" remix. He remixed his own song

16:12:05 10 that he played in DJ clubs.

16:12:08 11 That is a remix of a David Guetta

16:12:11 12 song, to my knowledge.

16:12:13 13 Q. Is that "Love Is Gone"?

16:12:16 14 A. Right.

16:12:17 15 First, that guitar twang was on "Now

16:12:19 16 That The Love Is Gone."

16:12:20 17 Q. Is that --

16:12:21 18 A. First.

16:12:22 19 Q. And --

16:12:23 20 A. I'm not finished with my answer.

16:12:23 21 Q. I'm sorry. I apologize.

16:12:24 22 A. I'm not finished with my answer.

16:12:26 23 Q. I apologize. I apologize.

16:12:27 24 A. She's doing her best.

16:12:28 25 Q. Right. So we are all.



16:12:29 1 A. That guitar twang first was heard on  
16:12:33 2 "Now That The Love Is Gone."  
16:12:34 3 That was a request.  
16:12:35 4 "This song works in clubs. I would  
16:12:37 5 like to have a song like this for the new Black Eyed  
16:12:41 6 Peas record."  
16:12:42 7 So he then sent me a version of that  
16:12:43 8 song that no one's heard, that he's played two times.  
16:12:47 9 "I played it two times. The club went  
16:12:49 10 crazy, Will.i.am."  
16:12:50 11 Right?  
16:12:50 12 So I then wrote "I gotta  
16:12:52 13 feeling...ooohooo" (indicating) -- right -- to that.  
16:12:53 14 The hook came first, then the mumble.  
16:13:05 15 Q. When you say "The hook came first,"  
16:13:06 16 what are you referring to?  
16:13:06 17 A. "I gotta feeling" (Deponent singing).  
16:13:08 18 That's the hook, sir.  
16:13:09 19 Q. Uh-huh. Okay.  
16:13:11 20 A. And then the verse.  
16:13:12 21 Q. Got it.  
16:13:12 22 A. And then I wrote it.  
16:13:13 23 Q. Uh-huh.  
16:13:14 24 A. So the file that he sent me --  
16:13:16 25 Q. Uh-huh.

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16:59:00 1 BY MR. GOULD:

16:59:00 2 Q. What you just heard, is there any part  
16:59:04 3 of "Love Is Gone" that sounds similar to you to  
16:59:07 4 that?

16:59:07 5 A. Yes.

16:59:08 6 Q. Okay. And did you write -- is that  
16:59:08 7 what you were referring to, in part, when you told  
16:59:12 8 Guetta that you liked "Love Is Gone"?

16:59:14 9 A. No.

16:59:14 10 I told David Guetta that I wanted  
16:59:16 11 "diga diga diga diga diga diga diga diga"  
16:59:16 12 (indicating).

16:59:20 13 And he put his two cents in and said,  
16:59:21 14 "No, that is dated."

16:59:21 15 BY MR. GOULD:

16:59:21 16 Q. Okay.

16:59:22 17 A. "You want the new sound." So I  
16:59:25 18 trusted his judgement.

16:59:26 19 Q. Got it.

16:59:27 20 A. An -- and that's what it was  
16:59:28 21 (indicating).

16:59:28 22 MS. CENAR: Let the record reflect  
16:59:30 23 that the witness just pointed to Exhibit Number 8  
16:59:33 24 when he says, "That's what it was."

16:59:35 25 ///

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16:59:35 1 BY MR. GOULD:

16:59:35 2 Q. Let's play "I Gotta Feeling," the  
16:59:38 3 song -- the actual song.

16:59:39 4 A. That is the actual "I Gotta Feeling."

16:59:42 5 Q. Yeah. We're going to play the one  
16:59:43 6 that's been released.

16:59:45 7 A. That's that. We didn't change  
16:59:46 8 anything.

16:59:47 9 Q. Okay. That's good. All right.  
16:59:47 10 So you didn't change anything from  
16:59:48 11 what you just heard?

16:59:50 12 A. Nothing at all. Just reconfigured  
16:59:52 13 it.

16:59:53 14 Q. Okay. Now I'm going to play for you  
16:59:54 15 the actual song "I Gotta Feeling." I'm going to play  
16:59:57 16 a certain part of that.

16:59:59 17 A. Okay.

17:00:01 18 MS. CENAR: Can we have some  
17:00:02 19 foundation for what you're about to play, please.

17:00:04 20 THE DEPONENT: "I Gotta Feeling." I'm  
17:00:05 21 sorry.

17:00:07 22 MS. CENAR: Have you ever heard that  
17:00:08 23 song before?

17:00:10 24 THE DEPONENT: Yep.

17:00:11 25 MR. GOULD: It's a great song.

17:58:20 1 (WHEREUPON, DEPOSITION EXHIBIT  
17:58:20 2 NUMBER 10 WAS MARKED FOR IDENTIFICATION  
17:58:20 3 BY THE DEPOSITION OFFICER.)

17:58:20 4 MS. CENAR: Let counsel look at it  
17:58:21 5 first.

17:58:29 6 (DOCUMENT REVIEWED BY COUNSEL.)

17:58:30 7 MR. GOULD: Okay.

17:58:55 8 BY MS. CENAR:

17:58:55 9 Q. I've handed to you what's been marked  
17:58:56 10 as Exhibit Number 10, which is bearing a Bates number  
17:59:00 11 BEP-PR-1C.

17:59:05 12 Can you tell me what that is, sir?

17:59:06 13 A. So this is an e-mail. Earlier I said  
17:59:13 14 it was in November. I was wrong. It was December.  
17:59:16 15 And that's the day I was in Colorado and then flew  
17:59:20 16 back home and then recorded "I Gotta Feeling" that  
17:59:23 17 night.

17:59:23 18 And then on New Year's Eve trans --  
17:59:29 19 translated my mumble into English.

17:59:35 20 And then the other guys came and did  
17:59:38 21 their part in January, and Fergie came and did her  
17:59:41 22 part in February.

17:59:43 23 Q. So does Exhibit 10 refresh your  
17:59:45 24 recollection as to when you would have received the  
17:59:47 25 audio file which was marked as Exhibit Number 8?

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17:59:50 1 A. Yeah, December 20th, 2008.

17:59:51 2 Q. And does Exhibit Number 10 refresh

17:59:54 3 your recollection as to when you first started

17:59:56 4 working on the song "I Gotta Feeling"?

17:59:58 5 A. I started working on it on

18:00:00 6 December 20th.

18:00:01 7 MS. CENAR: Can we mark this next one

18:00:02 8 as Exhibit Number 11, please.

18:00:26 9 (WHEREUPON, DEPOSITION EXHIBIT NUMBER

18:00:26 10 11 WAS MARKED FOR IDENTIFICATION BY

18:00:26 11 THE DEPOSITION OFFICER.)

18:00:26 12 DEPOSITION OFFICER: Here.

18:00:27 13 MS. CENAR: Yes, please let Mr. Gould

18:00:29 14 take a look at it.

18:00:31 15 MR. GOULD: Yeah.

18:00:36 16 BY MS. CENAR:

18:00:36 17 Q. I've handed to you what's been marked

18:00:38 18 as Exhibit Number 11. Why don't you take a moment

18:00:40 19 and look at that.

18:00:41 20 Can you tell us what that is, please?

18:00:44 21 A. David Guetta, he sent me an e-mail

18:00:46 22 after I played him the -- the finished lyric and

18:00:52 23 recorded, minus Fergie, over the phone.

18:00:56 24 And he sent me an e-mail saying:

18:00:58 25 "Do you have any idea how big 'I

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DEPONENT'S SIGNATURE

Please be advised I, \_\_\_\_\_,  
have read the foregoing deposition pages \_\_\_\_\_  
through \_\_\_\_\_, inclusive. I hereby state  
there are:

(CHECK ONE):

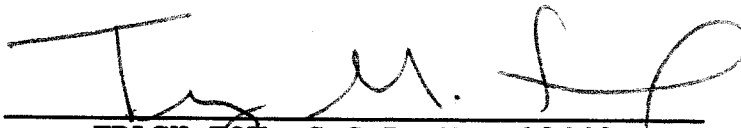
\_\_\_\_\_ NO CORRECTIONS.

\_\_\_\_\_ CORRECTIONS PER ATTACHED.

\_\_\_\_\_  
(SIGNATURE OF THE DEPONENT)

---o0o---

1 STATE OF CALIFORNIA )  
2 ) .SS  
3 COUNTY OF LOS ANGELES)  
4  
5 I, TRACY M. FOX, CERTIFIED SHORTHAND  
6 REPORTER, CERTIFICATE NUMBER 10449, FOR THE  
7 STATE OF CALIFORNIA, HEREBY CERTIFY:  
8  
9 THE FORGOING PROCEEDINGS WERE TAKEN  
10 BEFORE ME AT THE TIME AND PLACE THEREIN  
11 SET FORTH, AT WHICH TIME THE DEPONENT WAS PLACED  
12 UNDER OATH BY ME;  
13  
14 THE TESTIMONY OF THE DEPONENT AND ALL  
15 OBJECTIONS MADE AT THE TIME OF THE EXAMINATION  
16 WERE RECORDED STENOGRAPHICALLY BY ME AND WERE  
17 THEREAFTER TRANSCRIBED;  
18  
19 THE FOREGOING TRANSCRIPT IS A TRUE AND  
20 CORRECT TRANSCRIPT OF MY SHORTHAND NOTES SO TAKEN;  
21  
22 I FURTHER CERTIFY THAT I AM NEITHER COUNSEL  
23 FOR NOR RELATED TO ANY PARTY TO SAID ACTION,  
24 NOR IN ANY WAY INTERESTED IN THE OUTCOME THEREOF.  
25  
26 IN WITNESS WHEREOF, I HAVE HEREUNTO SUBSCRIBED  
27 MY NAME THIS 2ND DAY OF AUGUST, 2011.

  
\_\_\_\_\_  
TRACY FOX, C.S.R. No. 10449  
CERTIFIED SHORTHAND REPORTER