



1           3.     I understand that the Plaintiff in this lawsuit, Bryan Pringle—who  
2 claims to have used the aliases “Altared State,” “Dead Beat Club,” “Counter  
3 Culture,” “Technique,” “Technik,” “DJ Spanky,” “Spanky” and “Ultraviolence”—  
4 claims that a portion of the music of “I Gotta Feeling” was copied from a song  
5 entitled “Take a Dive” (Dance Version) that Pringle claims to have created in or  
6 around 1999. In particular, I understand that Pringle claims that the guitar “twang”  
7 sequence that appears in “I Gotta Feeling” was copied from “Take a Dive” (Dance  
8 Version).

9           4.     These claims are completely untrue. Mr. Riesterer and I independently  
10 created the music that was used in “I Gotta Feeling,” without copying any material  
11 from Pringle. In fact, before this lawsuit began, I had never heard of anyone named  
12 Byran Pringle or anyone using any the above aliases, nor had I ever heard the songs  
13 “Take a Dive,” “Take a Dive” (Dance Version) or any other songs by Pringle or any  
14 of the above aliases.

15           5.     I understand that Pringle claims that, in or around 2001 to 2004, a  
16 music producer named Joachim Garraud and I sent Pringle a letter on behalf of Gum  
17 Productions acknowledging that we had received a “demo” CD containing his song  
18 “Take a Dive” (Dance Version). That claim is completely untrue. I have never  
19 received any music, whether in the form of a “demo” CD or otherwise, from anyone  
20 named Bryan Pringle or from any of the above aliases. Nor have I ever heard any  
21 music by Bryan Pringle or by anyone using any of the above aliases, at any time  
22 before this litigation began. I have also never sent any written communication to, or  
23 received any written communication from anyone named Bryan Pringle or anyone  
24 using any of the above aliases, whether addressed to Gum Productions, to me  
25 personally, or to anyone else.

26           6.     I understand that Pringle has suggested that Mr. Riesterer or I obtained  
27 the guitar twang sequence that appears in “I Gotta Feeling” from Joachim Garraud.  
28 This is completely untrue. Fred Riesterer, with whom I worked closely in creating

1 the music for "I Gotta Feeling," independently composed the guitar twang sequence.  
2 Mr. Garraud never gave me a copy, nor played for me any recording, of the guitar  
3 twang sequence.

4 7. Although Mr. Riesterer and I have worked with Garraud in the past,  
5 including on the song "Love is Gone" which was released in 2007, Mr. Riesterer  
6 independently composed the guitar sequence that appears in "Love is Gone."  
7 Moreover, the guitar twang sequence in "I Gotta Feeling" was created using a  
8 different guitar preset, different notes and chords, and different sound processing  
9 effects, than were used in creating the guitar sequence in "Love is Gone." And  
10 Garraud was not involved in any way in the creation of the music for "I Gotta  
11 Feeling."

12 I declare under penalty of perjury under the laws of the United States of  
13 America that the foregoing is true and correct. Executed in Paris, France, this 9<sup>th</sup>  
14 day of November, 2011.

15  
16  
17   
18 DAVID GUETTA