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11 Attorneys for Plaintiff
BRYAN PRINGLE

12
13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**
15 **SOUTHERN DIVISION**

16 BRYAN PRINGLE, an individual,) Case No. SACV 10-1656 JST(RZx)
17 Plaintiff,)
18 v.) **DECLARATION OF DEAN A.**
19 WILLIAM ADAMS, JR.; STACY) **DICKIE IN OPPOSITION TO**
20 FERGUSON; ALLAN PINEDA; and) **DEFENDANTS' MOTION FOR**
collectively as the music group The Black) **SUMMARY JUDGMENT**
21 Eyed Peas, *et al.*,)
22 Defendants.)
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1 1. I am a partner at the law firm of Miller, Canfield, Paddock and Stone,
2 P.L.C. (“Miller Canfield”) and am lead counsel for Plaintiff, Bryan Pringle
3 (“Plaintiff” or “Pringle”) in the above-captioned action. I am a member in good
4 standing of the State Bar of Illinois.

5 2. Portions of the transcript of the deposition of plaintiff Bryan Pringle in
6 taken this action on August 24, 2011 are attached to this Declaration as Exhibit “A.”

7 3. Portions of the transcript of the deposition of defendant David Guetta
8 taken in this action on September 26, 2011 are attached to this Declaration as Exhibit
9 “B.”

10 4. Portions of the transcript of the deposition of defendant Frederick
11 Riesterer taken in this action on June 23, 2011 are attached to this Declaration as
12 Exhibit “C.”

13 5. Portions of the transcript of the deposition of defendant William Adams,
14 Jr. taken in this action on July 25, 2011 are attached to this Declaration as Exhibit
15 “D.”

16 6. Portions of the transcript of the deposition of Erik Laykin taken in this
17 action on December 7, 2011 are attached to this Declaration as Exhibit “E.”

18 7. Portions of the transcript of the deposition of Paul Geluso taken in this
19 action on December 16, 2011 are attached to this Declaration as Exhibit “F.”

20 8. Portions of the transcript of the deposition of Jaime Gomez taken in this
21 action on July 22, 2011 are attached to this Declaration as Exhibit “G.”

22 9. Portions of the transcript of the deposition of Allan Pineda taken in this
23 action on July 26, 2011 are attached to this Declaration as Exhibit “H.”

24 10. Attached as Exhibit “I” to this Declaration a true and correct copy of
25 each of the Initial Rule 26 Disclosures made by each of the Defendants in this action.

26 11. Attached as Exhibit “J” to this Declaration a true and correct copy of the
27 email exchange with Tal Dickstein dated August 17, 2011.
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1 12. Attached as Exhibit “K” to this Declaration a true and correct copy of
2 the December 9, 2011 letter to the Copyright Office with supporting attachments.

3 13. Attached as Exhibit “L” to this Declaration is a true and correct copy of
4 an email dated February 6, 2009, which was identified as Exhibit 41 to the deposition
5 of David Guetta.

6 14. Attached as Exhibit “M” to this Declaration is a certified copy of the
7 Certificate of Registration for Copyright No. SRu 387-433 issued to Bryan Pringle
8 on April 29, 1998 for the compilation of songs entitled *Dead Beat Club: 1998*, which
9 includes the song “Take a Dive.”

10 15. Portions of the transcript of the deposition of Stacy Ferguson taken in
11 this action on July 27, 2011 are attached to this Declaration as Exhibit “N.”

12 I declare under penalty of perjury under the laws of the United States that the
13 statements contained in this Declaration are true and correct. Executed this 19th day
14 of December, 2011, at Chicago, Illinois.

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18 Dean A. Dickie
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EXHIBIT M
(CERTIFIED COPYRIGHT REGISTRATION CERTIFICATE)
FILED MANUALLY

CERTIFICATE OF SERVICE

1 On December 19, 2011, I electronically filed the foregoing DECLARATION
2 OF DEAN A. DICKIE IN OPPOSITION TO DEFENDANTS' MOTION FOR
3 SUMMARY JUDGMENT using the CM/ECF system which will send notification of
4 such filing to the 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: December 19, 2011 /s/Colin C. Holley

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