

**EXHIBIT 16**

1 Dean A. Dickie (appearing *Pro Hac Vice*)  
Dickie@MillerCanfield.com  
2 Kathleen E. Koppenhoefer (appearing *Pro Hac Vice*)  
Koppenhoefer@MillerCanfield.com  
3 Katharine N. Dunn (appearing *Pro Hac Vice*)  
Dunn@MillerCanfield.com  
4 MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.  
225 West Washington Street, Suite 2600  
5 Chicago, IL 60606  
Telephone: 312.460.4200  
6 Facsimile: 312.460.4288

7 Ira Gould (appearing *Pro Hac Vice*)  
Gould@igouldlaw.com  
8 Ryan L. Greely (appearing *Pro Hac Vice*)  
Rgreely@igouldlaw.com  
9 GOULD LAW GROUP  
120 North LaSalle Street, Suite 2750  
10 Chicago, IL 60602  
Telephone: 312.781.0680  
11 Facsimile: 312.726.1328

12 George L. Hampton IV (State Bar No. 144433)  
ghampton@hamptonholley.com  
13 Colin C. Holley (State Bar No. 191999)  
cholley@hamptonholley.com  
14 HAMPTONHOLLEY LLP  
2101 East Coast Highway, Suite 260  
15 Corona del Mar, California 92625  
Telephone: 949.718.4550  
16 Facsimile: 949.718.4580

17 Attorneys for Plaintiff  
BRYAN PRINGLE

18

19 **UNITED STATES DISTRICT COURT**  
20 **CENTRAL DISTRICT OF CALIFORNIA**  
21 **SOUTHERN DIVISION**

22 BRYAN PRINGLE, an individual,

23 Plaintiff,

24 v.

25 WILLIAM ADAMS, JR.; STACY  
26 FERGUSON; ALLAN PINEDA; and  
27 JAIME GOMEZ, all individually and  
collectively as the music group The Black  
Eyed Peas, *et al.*,

28 Defendants.

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

) **PLAINTIFF'S RESPONSE TO**  
) **DEFENDANT STACY**  
) **FERGUSON'S FIRST SET OF**  
) **INTERROGATORIES**

) **Complaint Filed: October 28, 2010**  
) **Trial Date: January 24, 2012**

1 PROPOUNDING PARTY: Defendant STACY FERGUSON  
2 RESPONDING PARTY: Plaintiff BRYAN PRINGLE  
3 SET NO.: One  
4

5 Plaintiff Bryan Pringle submits this Answer to Defendant, Stacy Ferguson's  
6 ("Ferguson"), First Set of Interrogatories (the "Interrogatories").  
7

8 **GENERAL OBJECTIONS**

9 1. Plaintiff objects to each interrogatory insofar as it is vague, overly  
10 broad, not limited in time and scope, oppressive, harassing or vexatious, imposes  
11 burden or expense that outweighs the likely benefit, seeks legal conclusions, and/or  
12 seeks information not relevant to the lawsuit nor reasonably calculated to lead to the  
13 discovery of admissible evidence.

14 2. Plaintiff objects to the extent that these interrogatories seek information  
15 protected by the attorney/client or the work product privilege. Plaintiff will not  
16 provide any such privileged information.

17 3. The following answers are given based upon the information and  
18 documents of which Plaintiff's counsel is currently aware. Plaintiff's investigation  
19 continues and Plaintiff specifically reserves the right to supplement the following  
20 answers as this litigation proceeds. The following answers are given herein without  
21 prejudice to Plaintiff's right to supplement or change its answers or objections and to  
22 produce evidence of additional facts.

23 4. Plaintiff's answers are not an admission that any such information is  
24 relevant or admissible.

25 5. Plaintiff objects to each interrogatory, instruction or definition that  
26 purports to impose any obligation greater than or different from those required under  
27 the Federal Rules of Civil Procedure and Local Orders of the Court.

28 6. Plaintiff specifically reserves the right to assert additional objections.

1 **DEFINITIONS AND INSTRUCTIONS**

2 Plaintiff objects to each and every definition and instruction as set forth in  
3 Defendant's Interrogatories because each purports to impose an obligation greater  
4 than or different from those required under the Federal Rules of Civil Procedure and  
5 Local Orders of the Court.

6 **INTERROGATORIES**

7  
8 **INTERROGATORY NO. 1:** State with specificity, using standard music notation  
9 and concrete musical examples (as opposed to merely listing generalized musical  
10 elements and descriptions) each and every difference between the MUSICAL  
11 COMPOSITIONS embodied in TAKE A DIVE and TAKE A DIVE (DANCE  
12 VERSION).

13 **ANSWER:** Objection. Plaintiff objects to Interrogatory No. 1 because  
14 it is overbroad, unduly burdensome and calls for the disclosure of  
15 attorney work product and attorney client privileged information.  
16 Without waiving said objection, Plaintiff directs Defendant to Plaintiff's  
17 declaration in support of his Motion for Preliminary Injunction and to  
18 the allegations contained within his First Amended complaint, including  
19 Paragraphs 27 - 30. Investigation continues.

20 **INTERROGATORY NO. 2:** State *in seriatim* and with specificity all things YOU  
21 used to create the MUSICAL COMPOSITION embodied in TAKE A DIVE  
22 (DANCE VERSION), including all hardware, software, instruments (including  
23 human voice), or otherwise.

24  
25 **ANSWER:** Plaintiff objects to Interrogatory No. 2 because it is vague,  
26 overly broad and unduly burdensome. Without waiving his objection,  
27 Plaintiff states that he used an Ensoniq ASR-10, 16 track midi  
28 sequencer, sampler and workstation, with a built in effects processor,

1 floppy drive, with an expandable 16 mb ram and optional SCSI port for  
2 storage to compatible hard drives. Plaintiff had the optional digital I/O  
3 port, the fully expanded (16) mb ram, the SCSI port, with multiple  
4 compatible hard drives, and other compatible cd-rom drives, as well as a  
5 Sony multi-cd player with a digital I/O port (for sampling  
6 instrumentation and effects from licensed sources such as instrumental  
7 construction disks from third party vendors). Instruments would either  
8 be loaded into the ASR-10 via floppy drive, cd-rom and hard drive, or  
9 sampled into the ASR-10, via the digital I/O port or sampled from an  
10 external audio source such as one of the many different midi keyboards  
11 that he used, including but not limited to, Akai, Korg, Yamaha, Roland,  
12 Kurzweil, Emu, and Ensoniq, or custom instruments would be created  
13 and then individual wavesamples would be loaded into the custom  
14 created instruments via cd-rom, hard drive, or floppy drive. Plaintiff  
15 also used an Audio Technica microphone, rackmount compressor, and  
16 rackmount Digitech effects processor, as well as other unknown  
17 equipment. Investigation continues.

18 **INTERROGATORY NO. 3:** State *in seriatim* and with specificity all things YOU  
19 used to create TAKE A DIVE (DANCE VERSION) SR, including all hardware,  
20 software, instruments (including human voice), or otherwise.  
21

22 **ANSWER:** See answer and objections to Interrogatory No. 2.

23 **INTERROGATORY NO. 4:** State with specificity the date or dates during which  
24 YOU claim to have authored the MUSICAL COMPOSITION, TAKE A DIVE  
25 (DANCE VERSION).  
26

27 **ANSWER:** Objection. Plaintiff objects to Interrogatory No. 4 because  
28 it is vague. Without waiving his objection, Plaintiff directs Defendant

1 to the allegations contained within the First Amended Complaint, to his  
2 declaration in support of Plaintiff's Motion for Preliminary Injunction  
3 and states that he authored TAKE A DIVE (DANCE VERSION) during  
4 1998 to 1999. Investigation continues.

5 **INTERROGATORY NO. 5:** State with specificity the date or dates during which  
6 YOU claim to have authored the TAKE A DIVE (DANCE VERSION) SR.

7  
8 **ANSWER:** Objection. Plaintiff objects to Interrogatory No. 5 because  
9 it is vague. Without waiving his objection, Plaintiff directs defendant to  
10 the allegations in his First Amended Complaint, to his declaration in  
11 support of Plaintiff's Motion for Preliminary Injunction and states that  
12 he authored TAKE A DIVE (DANCE VERSION) SR during 1998 to  
13 1999. Investigation continues.

14 **INTERROGATORY NO. 6:** IDENTIFY all other PERSONS besides YOU who  
15 assisted with, participated in, have knowledge concerning, or are in any way  
16 connected with, the creation of the MUSICAL COMPOSITION, TAKE A DIVE  
17 (DANCE VERSION).

18 **ANSWER:** Objection. Plaintiff objects to Interrogatory No. 6 because it  
19 is overly broad, unduly burdensome and not likely to lead to the  
20 discovery of relevant evidence. Without waiving said objections, none.  
21 Investigation continues.

22  
23 **INTERROGATORY NO. 7:** IDENTIFY all other PERSONS besides YOU who  
24 assisted with, participated in, have knowledge concerning, or are in any way  
25 connected with the creation of TAKE A DIVE (DANCE VERSION) SR, including  
26 as a result of having rendered a performance of the MUSICAL COMPOSITION  
27 embodied therein.

28

1           **ANSWER:** Objection. Plaintiff objects to Interrogatory No. 7 because  
2           it is vague, overly broad, unduly burdensome and not likely to lead to  
3           the discovery of relevant evidence. Without waiving said objections,  
4           none. Investigation continues.

5           **INTERROGATORY NO. 8:** State all FACTS that YOU contend demonstrate that  
6           any of the DEFENDANTS had ACCESS to the MUSICAL COMPOSITION, TAKE  
7           A DIVE (DANCE VERSION), prior to 2009. The term "ACCESS" as used herein  
8           means to have actually heard, or had a reasonable opportunity or possibility to hear  
9           the MUSICAL COMPOSITION at issue.

10           **ANSWER:** Objection. Plaintiff objects to Interrogatory No. 8 because  
11           it is overly broad, unduly burdensome and not likely to lead to the  
12           discovery of relevant evidence. Without waiving said objections,  
13           Plaintiff directs Defendant to his declaration in support of Plaintiff's  
14           Motion for Preliminary Injunction and to Paragraphs 31 to 39 of the  
15           First Amended Complaint. Plaintiff further refers Defendant to the  
16           musicologist expert report attached to Plaintiff's Motion for Preliminary  
17           Injunction. Investigation continues.

18           **INTERROGATORY NO. 9:** State with specificity each element of the MUSICAL  
19           COMPOSITION, TAKE A DIVE (DANCE VERSION), that YOU contend to be  
20           ORIGINAL to YOU. The term "ORIGINAL" as used herein means those elements  
21           of the MUSICAL COMPOSITION that were actually created by YOU as opposed to  
22           copied from, or merely reference, other sources, and that exhibit some minimal level  
23           of creativity.

24           **ANSWER:** Objection. Plaintiff objects to Interrogatory No. 9 because  
25           it is vague and requiring disclosure of attorney work product and  
26           attorney client privileged information. Without waiving said objection,  
27             
28

1 Plaintiff states that the entire musical composition of TAKE A DIVE  
2 (DANCE VERSION) is original to Plaintiff. Investigation continues.

3 **INTERROGATORY NO. 10:** State *in seriatim*, and in full and explicit terms,  
4 each element of the MUSICAL COMPOSITION, TAKE A DIVE (DANCE  
5 VERSION), that YOU contend is protectable according to established copyright law  
6 irrespective of whether YOU view the work to be copyrightable subject matter under  
7 either 17 U.S.C. § 102(a)(2), 17 U.S.C. § 103, or both.

8  
9 **ANSWER:** Objection. Plaintiff objects to Interrogatory No. 10 as  
10 requiring disclosure of attorney work product and attorney-client  
11 privileged information and to the extent it asks for a legal conclusion.  
12 Subject to and without waiving his objections, Plaintiff states that the  
13 entire musical composition TAKE A DIVE (DANCE VERSION) is  
14 protectable according to established U.S. copyright law. Investigation  
15 continues.

16 **INTERROGATORY NO. 11:** State *in seriatim*, and with specificity, all  
17 DOCUMENTS, copyright principles and authority, music-related texts, expert  
18 reports, or other sources of authority that YOU actually used in determining YOUR  
19 response to Interrogatory No. 10, above.

20  
21 **ANSWER:** Objection. Plaintiff objects to Interrogatory No. 11 to the  
22 extent it asks for information that is work product or attorney client  
23 privileged. Plaintiff further objects to Interrogatory No. 11 to the extent  
24 that it requires a legal conclusion. Subject to and without waiving his  
25 objections, Plaintiff refers Defendant to U.S. Copyright Law and case  
26 law, including *Feist Publications Inc. v. Rural Telephone Service Co.*,  
27 Inc., 499 U.S. 340 (1991), *Metcalf v. Bochco*, 294 F.3d 1069 (9th Cir.  
28 2002) and *Three Boys Music Corp. v. Michael Bolton*, 212 F.3d 477



1 (9th Cir. 2000). Plaintiff also relied on the professional opinions and  
2 reports of his experts. Investigation continues.

3 **INTERROGATORY NO. 12:** State *in seriatim*, explicitly and with specificity, all  
4 protectable elements YOU set forth in response to Interrogatory No. 10 above, that  
5 YOU contend appear in, or are shared by, the MUSICAL COMPOSITION, Gotta  
6 Feeling."

7  
8 **ANSWER:** Objection. Plaintiff objects to Interrogatory No. 12 because  
9 it is overly broad, unduly burdensome and asks for information that is  
10 work product or attorney client privileged. Without waiving said  
11 objection, Plaintiff directs Defendant to Plaintiff's declaration in support  
12 of Plaintiff's Motion for Preliminary Injunction, to the musicologist  
13 report attached to his Motion for Preliminary Injunction, and to the First  
14 Amended Complaint, including paragraphs 40 through 43. Investigation  
15 continues.

16 **INTERROGATORY NO. 13:** For each element set forth in YOUR response to  
17 Interrogatory No. 12, above, state all FACTS supporting YOUR contention that each  
18 shared element resulted from, and only from, copying the MUSICAL  
19 COMPOSITION, "TAKE A DIVE (DANCE VERSION)."

20  
21 **ANSWER:** See answer and objections to Interrogatory No. 12. Plaintiff  
22 further directs Defendant to Plaintiff's declaration in support of  
23 Plaintiff's Motion for Preliminary Injunction, and to paragraphs 31  
24 through 39 of the First Amended Complaint. Investigation continues.

25 **INTERROGATORY NO. 14:** List *in seriatim* and in full and explicit terms, each  
26 similarity YOU perceive to exist between the MUSICAL COMPOSITIONS "TAKE  
27 A DIVE (DANCE VERSION)" and "I Gotta Feeling."  
28

1           **ANSWER:** See answer and objections to Interrogatory No. 12.  
2           Investigation continues.

3           **INTERROGATORY NO. 15:** State all FACTS that evidence that any of the  
4           DEFENDANTS actually copied the MUSICAL COMPOSITION, TAKE A DIVE  
5           (DANCE VERSION), when creating the MUSICAL COMPOSITION entitled "I  
6           Gotta Feeling."

7           **ANSWER:** See answer and objections to Interrogatory No. 13.  
8           Investigation continues.

9           **INTERROGATORY NO. 16:** State all FACTS that YOU contend demonstrate  
10           that any of the DEFENDANTS had ACCESS to TAKE A DIVE (DANCE  
11           VERSION) SR prior to 2009. The term "ACCESS" as used herein means to have  
12           actually heard, or had a reasonable opportunity or possibility to hear, the SOUND  
13           RECORDING at issue.

14           **ANSWER:** See answer and objections to Interrogatory No. 8.  
15           Investigation continues.

16           **INTERROGATORY NO. 17:** List *in seriatim* and in full and explicit terms, each  
17           similarity YOU perceive to exist between TAKE A DIVE (DANCE VERSION) SR  
18           and "I Gotta Feeling."

19           **ANSWER:** See answer and objections to Interrogatory No. 13.  
20           Investigation continues.

21           **INTERROGATORY NO. 18:** State all FACTS that any of the DEFENDANTS  
22           physically appropriated any portion of TAKE A DIVE (DANCE VERSION) SR  
23           when creating "I Gotta Feeling."

24           **ANSWER:** Objection. Plaintiff objects to Interrogatory No. 18  
25           because it is overly broad, unduly burdensome and requires the  
26

1 disclosure of attorney work product and attorney client privileged  
2 information. Without waiving said objections, Plaintiff refers  
3 Defendant to the report of expert Mark Rubel attached to Plaintiff's  
4 Motion for Preliminary Injunction. Investigation continues.

5 **INTERROGATORY NO. 19:** State with specificity, and according to YOUR  
6 personal knowledge, each and every PUBLIC PERFORMANCE, throughout the  
7 world, of the MUSICAL COMPOSITION, TAKE A DIVE (DANCE VERSION),  
8 including FACTS concerning when, where, by what means, and by whom the work  
9 was performed.

10  
11 **ANSWER:** Objection. Plaintiff objects to interrogatory No. 19 because  
12 it is unduly burdensome. Without waiving his objection, TAKE A DIVE  
13 (DANCE VERSION) was played throughout North America and  
14 Western Europe on the internet and the radio. Investigation continues.

15 **INTERROGATORY NO. 20:** State with specificity, and according to YOUR  
16 personal knowledge, each and every DISTRIBUTION, throughout the world, of the  
17 MUSICAL COMPOSITION, TAKE A DIVE (DANCE VERSION), including  
18 FACTS concerning when, where, by what means, by whom, and to whom the work  
19 was distributed.

20  
21 **ANSWER:** Objection. Plaintiff objects to Interrogatory No. 20 because  
22 it is vague, overly broad and unduly burdensome. Without waiving his  
23 objection, from around 1999 through 2006, Plaintiff submitted hundreds  
24 of demo cd's and tapes, all of which included "Take a Dive (Dance  
25 Version)," to various music publishers, record companies, talent  
26 managers, songwriters, booking agents and radio stations, including but  
27 not limited to: Universal (UMG), EMI, Interscope/Geffen, EMI Music  
28 Publishing (Jody Gerson, Big Jon Platt, Benjamin Groff, Andy

1 Furhman, Rebecca Wright), TVT Records, Reprise, Atlantic Records  
2 (WEA), Columbia (Sony), Electra (WEA), Hollywood Records, Epic  
3 Records, Electra Entertainment, Sony (ATV) Publishing (Bill Brown,  
4 Eric Beall), Interscope/UMG, Lava (WEA), Island Def-Jam Music  
5 Group, RCA, Maverick (WEA), Lava (WEA), Jennifer Havey, Sal  
6 Guastella, Matt Marshall, Ashley Newton, Brian Leach, Scott Austin,  
7 Debbie Southwood, Karen Kwak, Duff Marlowe, Ken Komisar, Mark  
8 Gormley, Wendy Higgs, Kaz Utsunomia, Mike Caren, John Pikus,  
9 Virgin Records, Warner Bros. Records, Craig Aaronson, A&M Records,  
10 Arista Records, Virgin Records, Sire, Rykodisc, Jen Bailey, ATN  
11 Management, Azoff Music Mangement, Caliente Entertainment, East  
12 End Management, Lindsay Scott, Mosaic Media Group, T. Skorman,  
13 McGhee Entertainment, Network Management and Rebel Waltz  
14 Management. This list includes various individuals and entities in  
15 Australia, America, Canada, Japan, France, Germany, Holland, Sweden,  
16 Switzerland, Great Britain and Ireland. Investigation continues.

17 **INTERROGATORY NO. 21:** State with specificity, and according to YOUR  
18 personal knowledge, each and every PUBLIC PERFORMANCE, throughout the  
19 world, of TAKE A DIVE (DANCE VERSION) SR, including FACTS concerning  
20 when, where, by what means, and by whom the work was performed.  
21

22 **ANSWER:** See answer and objections to Interrogatory No. 19.  
23 Investigation continues.

24 **INTERROGATORY NO. 22:** State with specificity, and according to YOUR  
25 personal knowledge, each and every DISTRIBUTION, throughout the world, of  
26 TAKE A DIVE (DANCE VERSION) SR, including FACTS concerning when,  
27 where, by what means, by whom, and to whom the work was distributed.  
28

1                    **ANSWER:** See answer and objections to Interrogatory Nos. 19 and 20.  
2                    Investigation continues.

3                    **INTERROGATORY NO. 23:** To the extent not covered by Interrogatories Nos.  
4 19 and 20 above, state with specificity all non-public or limited exploitations,  
5 throughout the world, of the MUSICAL COMPOSITION, TAKE A DIVE (DANCE  
6 VERSION), including all such performances and dispositions of COPIES thereof, as  
7 well as the activities YOU reference in Paragraphs 31 and 32 of YOUR  
8 COMPLAINT. In connection with such non-public or limited exploitations, YOU are  
9 to state all FACTS concerning when, where, by what means, by whom TAKE A  
10 DIVE (DANCE VERSION) was performed or distributed, and to whom it was  
11 distributed.

12                    **ANSWER:** See answer and objections to Interrogatory Nos. 19 and 20.  
13                    Investigation continues.

14                    **INTERROGATORY NO. 24:** To the extent not covered by Interrogatories Nos.  
15 21 and 22 above, state with specificity all non-public or limited exploitations,  
16 throughout the world, of TAKE A DIVE (DANCE VERSION) SR, including all  
17 such performances and dispositions of PHONORECORDS thereof, as well as the  
18 activities YOU reference in Paragraphs 31 and 32 of YOUR COMPLAINT. In  
19 connection with such non-public or limited exploitations, YOU are to state all  
20 FACTS concerning when, where, by what means, by whom TAKE A DIVE  
21 (DANCE VERSION) SR was performed or distributed, and to whom it was  
22 distributed.

23                    **ANSWER:** See answer and objections to Interrogatory No. 21 and 22.  
24                    Investigation continues.

25                    **INTERROGATORY NO. 25:** If other adaptations exist beyond TAKE A DIVE  
26 (DANCE VERSION) of the MUSICAL COMPOSITION entitled TAKE A DIVE  
27  
28

1 that YOU claim were created prior to 2009 and YOU claim are relevant to this  
2 lawsuit, please list all such adaptations.

3           **ANSWER:** Objection. Plaintiff objects to Interrogatory No. 25 because  
4 it is vague and overly broad. Without waiving his objection, Plaintiff  
5 states that there were multiple derivative versions of “Take a Dive” that  
6 were included on Plaintiffs’ demo cds and tapes, including several  
7 where the guitar twang sequence was soloed out as the introduction of  
8 the song. Plaintiff also states that the MUSICAL COMPOSITION is  
9 based at least in part, on Plaintiff’s song copyrighted songs “Faith” and  
10 “Faith Re-mix”. Investigation continues.

11 Dated: April 13, 2011

Dean A. Dickie (appearing Pro Hac Vice)  
Kathleen E. Koppenhoefer (appearing Pro Hac Vice)  
Katharine N. Dunn (appearing Pro Hac Vice)  
MILLER, CANFIELD, PADDOCK AND STONE,  
P.L.C.

Ira Gould (appearing Pro Hac Vice)  
Ryan L. Greely (appearing Pro Hac Vice)  
GOULD LAW GROUP

George L. Hampton IV (State Bar No. 144433)  
Colin C. Holley (State Bar No. 191999)  
HAMPTONHOLLEY LLP

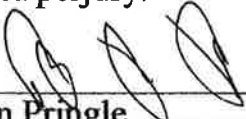
19 By:   
20 Attorneys for Plaintiff Bryan Pringle

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**VERIFICATION**

I, Bryan Pringle, state that I have knowledge of the foregoing events, and that the answers made to Defendant Ferguson's First Set of Interrogatories are true and correct, to the best of my knowledge.

I declare the foregoing to be true under penalty of perjury.

  
\_\_\_\_\_  
Bryan Pringle

April 12, 2011.

1  
2  
3 **PROOF OF SERVICE**

4 I am employed in the County of Cook, State of Illinois. I am over the age of  
5 18 and not a party to the within action. My business address is 225 West  
6 Washington Street, Suite 2600, Chicago, Illinois 60606.

7 On this date, I served the foregoing document and disc on all interested parties  
8 in this action listed on the attached Service List as follows:

9  (BY MAIL) - I am "readily familiar" with the firm's practice of  
10 collection and processing correspondence for mailing. Under that practice it would  
11 be deposited with the U.S. Postal Service on the same day with postage thereon fully  
12 prepaid at Chicago, Illinois in the ordinary course of business. I am aware that on  
13 motion of the party served, service is presumed invalid if postal cancellation date or  
14 postage meter date is more than one day after date of deposit for mailing on affidavit.

15  (BY FACSIMILE) - By transmitting a true copy thereof by facsimile  
16 from facsimile number 312.460-4201 to the facsimile number(s) shown on the  
17 attached Service List, for which electronic confirmation was received from the  
18 facsimile machine that said document was successfully transmitted without error.

19  (BY OVERNIGHT DELIVERY) - By depositing the above  
20 document(s) in a box or other facility regularly maintained by FedEx in an envelope  
21 or package designated by FedEx with delivery fees paid.

22  (BY EMAIL) - By causing a true copy of the document(s) to be served  
23 by electronic mail transmission at the time shown on each transmission, to each  
24 interested party at the email address shown on the attached Service List. Each  
25 transmission was reported as complete and without error.

26  (State) I declare under penalty of perjury under the laws of the state of  
27 California that the foregoing is true and correct.

28  (Federal) I declare under penalty of perjury under the laws of the United  
States that the foregoing is true and correct.

Executed on April 13, 2011, at Chicago, Illinois.

23   
24 \_\_\_\_\_  
25 Irina V. Frye



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**Service List**

***Bryan Pringle v. William Adams, Jr. et al.***  
**Case Number: 8:10-cv-01656-JST -RZ**

***Counsel for Defendants: William Adams, Jr., Allan Pineda, Jaime Gomez, Will.I.Am Music, LLC, Jeepney Music, Inc., Tab Magnetic Publishing, Cherry River Music Co., EMI April Music, Inc., and Headphone Junkie Publishing, LLC***

Kara E. F. Cenar, Esq.  
Mariangela Seale, Esq.  
**Bryan Cave LLP**  
161 North Clark Street, Suite 4300  
Chicago, IL 60601  
312-602-5000  
Fax: 312-602-5050  
Email: [kara.cenar@bryancave.com](mailto:kara.cenar@bryancave.com)  
Email: [merili.seale@bryancave.com](mailto:merili.seale@bryancave.com)

Jonathan S Pink, Esq.  
**Bryan Cave LLP**  
3161 Michelson Drive, Suite 1500  
Irvine, CA 92612-4414  
949-223-7000  
Fax: 949-223-7100  
Email: [jonathan.pink@bryancave.com](mailto:jonathan.pink@bryancave.com)

***Counsel for Defendant Shapiro Bernstein and Co.***

Donald A Miller, Esq.  
Karen R Thorland, Esq.  
**Loeb and Loeb LLP**  
10100 Santa Monica Boulevard Suite  
2200  
Los Angeles, CA 90067  
310-282-2000  
Fax: 310-282-2200  
Email: [dmiller@loeb.com](mailto:dmiller@loeb.com)  
Email: [karen\\_thorland@mpaa.org](mailto:karen_thorland@mpaa.org)

Barry I Slotnick, Esq.  
Tal Efrim Dickstein, Esq.  
**Loeb and Loeb LLP**  
345 Park Avenue  
New York, NY 10154-1895  
212-407-4000  
Fax: 212-407-4990  
Email: [bslotnick@loeb.com](mailto:bslotnick@loeb.com)  
Email: [tdickstein@loeb.com](mailto:tdickstein@loeb.com)

***Counsel for Defendants: UMG Recordings, Inc., Interscope Records***

Linda M. Burrow, Esq.  
Heather L. Pearson, Esq.  
**Caldwell Leslie and Proctor PC**  
1000 Wilshire Boulevard, Suite 600  
Los Angeles, CA 90017  
213-629-9040  
Fax: 213-629-9022  
Email: [burrow@caldwell-leslie.com](mailto:burrow@caldwell-leslie.com)  
Email: [pearson@caldwell-leslie.com](mailto:pearson@caldwell-leslie.com)