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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION

BRYAN PRINGLE, an individual,

Plaintiff,

v.

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.

Case No. SACV 10-1656 JST(RZx)

Hon. Josephine Staton Tucker  
Courtroom 10A

**[PROPOSED] ORDER GRANTING  
DEFENDANTS SHAPIRO  
BERNSTEIN & CO., INC.,  
FREDERIC RIESTERER AND  
DAVID GUETTA'S MOTION FOR  
SANCTIONS AGAINST PLAINTIFF  
AND HIS COUNSEL PURSUANT  
TO FED. R. CIV. P. 11**

PROPOSED ORDER

1           Having considered the Motion by Defendants Shapiro, Bernstein & Co., Inc.,  
2 Frederic Riesterer and David Guetta (together “Defendants”) for Sanctions Against  
3 Plaintiff and His Counsel Pursuant to Fed. R. Civ. P. 11, along with the supporting  
4 Memorandum of Law and supporting Declaration of Tal E. Dickstein with exhibits  
5 thereto, any opposition by Plaintiff and any reply by Defendants, as well as  
6 counsel’s argument at a hearing held on April 16, 2012, the Court finds that  
7 Plaintiff, Bryan Pringle, and his counsel have presented to the Court pleadings,  
8 written motions or other papers that were not presented for a proper purpose, assert  
9 claims or other legal contentions that are not warranted by existing law or by a  
10 nonfrivolous argument for extending, modifying, or reversing existing law or for  
11 establishing new law, and assert factual contentions that lack evidentiary support  
12 and were shown to lack evidentiary support after a reasonable opportunity for  
13 further investigation and discovery, and therefore violate Rule 11 of the Federal  
14 Rules of Civil Procedure.

15           Having further found that all of Defendants’ attorneys’ fees and expenses  
16 were incurred as a direct result of Plaintiff’s and his counsel’s violations of Rule 11,  
17 the Court hereby orders that Plaintiff, Bryan Pringle, and his counsel—Dean A.  
18 Dickie and Kathleen E. Koppenhoefer, individually as well as jointly and severally  
19 with Miller, Canfield, Paddock & Stone, P.L.C.; Ira P. Gould and Ryan L. Greely,  
20 individually as well as jointly and severally with Gould Law Group; and George L.  
21 Hampton IV and Colin C. Holley, individually as well as jointly and severally with  
22 HamptonHolley LLP—shall pay to Defendants their reasonable attorneys’ fees and  
23 expenses incurred in this action.

24           Defendants’ Motion is therefore GRANTED.

25           Defendants shall, within thirty (30) days hereof, submit billing records and/or  
26 other documentation setting forth their attorneys’ fees and expenses reasonably  
27 incurred in this action.  
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Dated: April \_\_, 2012  
Santa Ana, California

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Hon. Josephine Staton Tucker  
U.S.D.J.