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 & CO., INC., FREDERIC  
 8 RIESTERER, AND DAVID GUETTA

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10 UNITED STATES DISTRICT COURT  
 11 CENTRAL DISTRICT OF CALIFORNIA  
 12 SOUTHERN DIVISION

13 BRYAN PRINGLE, an individual,  
 14 Plaintiff,  
 15 v.

16 WILLIAM ADAMS, JR.; STACY  
 FERGUSON; ALLAN PINEDA; and  
 17 JAIME GOMEZ, all individually and  
 collectively as the music group The  
 18 Black Eyed Peas, et al.,  
 19 Defendants.

Case No. SACV 10-1656 JST(RZx)  
 Hon. Josephine Staton Tucker  
 Courtroom 10A

**DECLARATION OF TAL E.  
 DICKSTEIN IN SUPPORT OF  
 MOTION FOR SANCTIONS  
 AGAINST PLAINTIFF AND HIS  
 COUNSEL PURSUANT TO FED. R.  
 CIV. P. 11**

Complaint Filed: October 28, 2010

Trial Date: May 8, 2012

Hearing Date: April 16, 2012

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DICKSTEIN DECLARATION

1 I, TAL E. DICKSTEIN, declare as follows:

2 1. I am an attorney associated with the law firm Loeb & Loeb LLP,  
3 attorneys for Defendants Shapiro, Bernstein & Co, Inc., Frederic Riesterer and  
4 David Guetta in this action. I am a member in good standing of the Bar of the State  
5 of New York and was admitted to practice in this Court *pro hac vice* by Order dated  
6 December 21, 2010 (Doc. 69). I have personal knowledge of the facts set forth  
7 hereinafter, and I submit this declaration in support of Defendants' Motion for Rule  
8 11 Sanctions against Plaintiff Bryan Pringle and his Counsel.

9 2. Attached hereto as **Exhibit 1** is a true and correct copy of the  
10 Complaint filed in this action, dated October 28, 2010.

11 3. Attached hereto as **Exhibit 2** is a true and correct copy of the First  
12 Amended Complaint filed in this action, dated November 18, 2010.

13 4. Attached hereto as **Exhibit 3** is a true and correct copy of Plaintiff's  
14 Memorandum of Points and Authorities in Support of His Ex Parte Application for a  
15 Temporary Restraining Order and Order to Show Cause Re Preliminary Injunction,  
16 dated November 22, 2010.

17 5. Attached hereto as **Exhibit 4** is a true and correct copy of Plaintiff's  
18 Memorandum of Points and Authorities in Support of His Motion for Preliminary  
19 Injunction, dated January 3, 2011.

20 6. Attached hereto as **Exhibit 5** is a true and correct copy of the Joint  
21 Rule 26 Report filed in this action, dated February 18, 2011.

22 7. Attached hereto as **Exhibit 6** is a true and correct copy of excerpts of  
23 the deposition transcript of Bryan Pringle, dated August 24, 2011.

24 8. Attached hereto as **Exhibit 7** is a true and correct copy of Defendants  
25 Shapiro, Bernstein & Co., Inc., Frederic Riesterer and David Guetta's Memorandum  
26 of Law in Support of Motion for Summary Judgment, dated November 17, 2011.

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1           9.     Attached hereto as **Exhibit 8** is a true and correct copy of excerpts of  
2 Plaintiff's Response to Defendant Stacey Ferguson's First Set of Interrogatories,  
3 served April 13, 2011.

4           10.    Attached hereto as **Exhibit 9** is a true and correct copy of the transcript  
5 of the January 23, 2012 Court hearing on Defendants' Motion to Compel  
6 Supplemental Responses to Interrogatories from Plaintiff and for Sanctions.

7           11.    Attached hereto as **Exhibit 10** is a true and correct copy of excerpts of  
8 Plaintiff's Rule 26 Disclosures, dated February 28, 2011

9           12.    Attached hereto as **Exhibit 11** is a true and correct copy of Plaintiff's  
10 Notice of Document Subpoena to Taxi Music Network, dated June 23, 2011, and  
11 documents produced pursuant to that subpoena bearing production numbers TAXI  
12 0001- TAXI 0011.

13          13.    Attached hereto as **Exhibit 12** is a true and correct copy of excerpts of  
14 the deposition transcript of David Guetta, dated September 26, 2011.

15          14.    Attached hereto as **Exhibit 13** is a true and correct copy of excerpts of  
16 Plaintiff's Response to Defendant William Adams' First Set of Interrogatories,  
17 served April 13, 2011.

18          15.    Attached hereto as **Exhibit 14** is a true and correct copy of excerpts of  
19 Plaintiff's Supplemental Response to Defendant William Adams' First Set of  
20 Interrogatories, served July 15, 2011.

21          16.    Attached hereto as **Exhibit 15** is a true and correct copy of Plaintiff's  
22 Opposition to Defendants' Motion for Summary Judgment, dated December 19,  
23 2011.

24          17.    Attached hereto as **Exhibit 16** is a true and correct copy of excerpts of  
25 an email sent from counsel for Defendants to counsel for Plaintiff, dated November  
26 30, 2011.

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1 18. Attached hereto as **Exhibit 17** is a true and correct copy of excerpts of  
2 an email sent from counsel for Plaintiff to counsel for Defendants, dated December  
3 27, 2011.

4 19. Attached hereto as **Exhibit 18** is a true and correct copy of excerpts of  
5 the deposition transcript of Alexander Norris, dated January 3, 2012.

6 20. Attached hereto as **Exhibit 19** is a true and correct copy of excerpts of  
7 the deposition transcript of Alexander Stewart, dated January 4, 2012.

8 21. Attached hereto as **Exhibit 20** is a true and correct copy of excerpts of  
9 a letter from counsel for Plaintiff to counsel for Defendants, dated August 30, 2010,  
10 which was produced in discovery bearing production numbers P-UMG 005985- P-  
11 UMG005991.

12 22. Attached hereto as **Exhibit 21** is a true and correct copy of excerpts of  
13 Plaintiff's Amended Answers to Defendant Headphone Junkie Publishing, LLC's  
14 First Set of Interrogatories, served November 2, 2011.

15 23. Attached here to as **Exhibit 22** is a true and correct copy of the  
16 transcript of the January 31, 2011 hearing on Plaintiff's motion for a preliminary  
17 injunction.

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19 I declare under penalty of perjury that the foregoing is true and correct.  
20 Executed this 1st day of March, 2012.

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23 TAL E. DICKSTEIN

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