

HAMPTONHOLLEY LLP
2101 East Coast Highway, Suite 260
Corona del Mar, California 92625

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

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 WILLIAM ADAMS'**
) **FIRST SET OF**
) **INTERROGATORIES**
) **Complaint Filed: October 28, 2010**
) **Trial Date: January 24, 2012**

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

5 Plaintiff Bryan Pringle submits this Answer to Defendant, William Adams'
6 ("Adams"), 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 **INTERROGATORY NO. 5:** IDENTIFY all other PERSONS besides YOU who
2 assisted with, participated in, have knowledge concerning, or are in any way
3 connected with, the creation of the MUSICAL COMPOSITION , TAKE A DIVE.

4 **ANSWER:** Objection. Plaintiff objects to Interrogatory No. 5 because
5 it is overly broad, unduly burdensome and not likely to lead to the
6 discovery of relevant evidence. Without waiving said objections, none.
7 Investigation continues.

8
9 **INTERROGATORY NO. 6:** IDENTIFY all other PERSONS besides YOU who a
10 who assisted with, participated in, have knowledge concerning, or are in any way
11 connected with, the creation of TAKE A DIVE SR, including by rendering a
12 performance of the MUSICAL COMPOSITION embodied therein.

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

17 **INTERROGATORY NO. 7:** Do YOU claim that the MUSICAL
18 COMPOSITION, TAKE A DIVE, was infringed by DEFENDANTS?
19

20 **ANSWER:** Objection. Plaintiff objects to Interrogatory No. 7 because
21 it asks for a legal conclusion. Without waiving said objection, yes.
22 Investigation continues.

23 **INTERROGATORY NO. 8:** If YOU responded to Interrogatory No. 7, above, in
24 the affirmative, state all FACTS that YOU contend demonstrate that any of the
25 DEFENDANTS had ACCESS to the MUSICAL COMPOSITION, TAKE A DIVE,
26 prior to 2009. The term "ACCESS" as used herein means to have actually heard, or
27 had a reasonable opportunity or possibility to hear, the MUSICAL COMPOSITION
28 at issue.

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

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

By: 
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 Adams' 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.