1 2 3 4 5 6 7	DONALD A. MILLER (SBN 228753) dmiller@loeb.com BARRY I. SLOTNICK (<i>Pro Hac Vice</i>) bslotnick@loeb.com TAL E. DICKSTEIN (<i>Pro Hac Vice</i>) tdickstein@loeb.com LOEB & LOEB LLP 10100 Santa Monica Boulevard, Suite 220 Los Angeles, California 90067-4120 Telephone: 310-282-2000 Facsimile: 310-282-2200 Attorneys for SHAPIRO, BERNSTEIN	00
8	& CO., INC., FREDERIC 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,	Case No. SACV 10-1656 JST(RZx)
14	Plaintiff,	Hon. Josephine Staton Tucker Courtroom 10A
15	V.) Courtroom ToA)
16	WILLIAM ADAMS, JR.; STACY FERGUSON; ALLAN PINEDA; and	AMENDED NOTICE OF MOTION BY DEFENDANTS SHAPIRO
17	JAIME GOMEZ, all individually and collectively as the music group The) BERNSTEIN & CO., INC.,) FREDERIC RIESTERER AND
18 19	Black Eyed Peas, et al., Defendants.) DAVID GUETTA FOR SANCTIONS) AGAINST PLAINTIFF AND HIS) COUNSEL PURSUANT TO FED. R.
20	Defendants.	CIV. P. 11
21		Complaint Filed: October 28, 2010
22		Trial Date: May 8, 2012
23) Motion Hearing Date: April 16, 2012
24) Motion Hearing Time: 10:00 AM
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26)
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		NOTICE OF MOTION FOR SANCTIONS

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PLEASE TAKE NOTICE that, on April 16, 2012 at 10:00 AM or as soon thereafter as counsel may be heard in the courtroom of the Honorable Josephine Staton Tucker, United States District Judge, Central District of California, located at the Santa Ana Courthouse, 411 West Fourth Street, Courtroom 10A, Santa Ana, California 92701-4516, Defendants Shapiro, Bernstein & Co, Inc., Frederic Riesterer and David Guetta (collectively "Defendants"), will and hereby do move for an Order imposing sanctions on Plaintiff Bryan Pringle and his present and former counsel—Dean A. Dickie and Kathleen E. Koppenhoefer, individually as well as jointly and severally with Miller, Canfield, Paddock & Stone, P.L.C.; Ira P. Gould and Ryan L. Greely, individually as well as jointly and severally with Gould Law Group; and George L. Hampton IV and Colin C. Holley, individually as well as jointly and severally with HamptonHolley LLP.

This Motion is made pursuant to Rule 11 of the Federal Rules of Civil Procedure, the Local Rules of this Court, and is based on this Notice of Motion; Defendants' Memorandum of Law in Support of Motion for Sanctions Against Plaintiff and His Counsel Pursuant to Fed. R. Civ. P. 11; the Declaration of Tal E. Dickstein with exhibits thereto; the Court file; any reply Defendants may make; and any further papers or argument as may be presented to the Court prior to or at the hearing on this motion, or subsequent thereto as directed by the Court.

Pursuant to Fed. R. Civ. P. 11(c)(2), this motion and supporting documents were served on Plaintiff's counsel and all counsel of record on February 6, 2012, more than 21 days prior to the filing of this motion.

This motion is made following Defendants' participation in a conference of counsel pursuant to Local Rule 7-3 held on June 27, 2011, as well as Defendants' invitation to hold an additional conference of counsel following service of this motion, which invitation was declined by Plaintiff's counsel.

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1	Dated: March 2, 2012	LOEB & LOEB LLP
2		By: s/Tal E. Dickstein
3		By: s/Tal E. Dickstein Donald A. Miller Barry I. Slotnick Tal E. Dickstein
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6		Attorneys for Defendants SHAPIRO, BERNSTEIN & CO., INC., FREDERIC RIESTERER and DAVID GUETTA
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