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

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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

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

Complaint Filed: October 28, 2010
 Hearing Date: April 16, 2012

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 further support of Defendants' Motion
8 for Rule 11 Sanctions against Plaintiff Bryan Pringle and his Counsel.

9 2. Attached hereto as **Exhibit 23** is a copy of Plaintiff's Original Petition
10 in *Bryan Pringle, et al. v. USAA, Insurance Agency, Inc.*, Cause No. 2003/16046
11 (District Court, 224th Judicial District, Bexar County, Texas).

12 3. Attached hereto as **Exhibit 24** is a copy of excerpts of the January 26,
13 2004 deposition transcript of Bryan Pringle in *Bryan Pringle, et al. v. USAA,*
14 *Insurance Agency, Inc.*, Cause No. 2003/16056 (District Court, 224th Judicial
15 District, Bexar County, Texas), as well as a copy of a list of lawsuits brought by
16 Bryan Pringle, which was attached as Exhibit 15 to said deposition transcript.

17 4. Attached hereto as **Exhibit 25** is a copy of Plaintiff's Response to
18 Defendant David Guetta's First Set of Interrogatories, dated November 14, 2011.

19 I declare under penalty of perjury that the foregoing is true and correct.
20 Executed this 2nd day of April, 2012.

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/s/ Tal E. Dickstein

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TAL E. DICKSTEIN

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