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11 Attorneys for Defendants WILLIAM ADAMS; STACY FERGUSON; ALLAN
PINEDA; and JAIME GOMEZ, all individually and collectively as the music
12 group THE BLACK EYED PEAS; will.i.am music, llc; TAB MAGNETIC
PUBLISHING; CHERRY RIVER MUSIC CO.; HEADPHONE JUNKIE
13 PUBLISHING, LLC; JEEPNEY MUSIC, INC.; EMI APRIL MUSIC, INC.

14 **UNITED STATES DISTRICT COURT**
CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION

15 BRYAN PRINGLE, an individual,
16
17 Plaintiff,
18 v.

Case No. SACV10-1656 JST (RZx)
Hon. Josephine Staton Tucker
Courtroom 10A

19 WILLIAM ADAMS, JR.; STACY
FERGUSON; ALLAN PINEDA; and
20 JAIME GOMEZ, all individually and
collectively as the music group the
Black Eyed Peas; DAVID GUETTA;
21 FREDERICK RIESTERER; UMG
RECORDINGS, INC.; INTERSCOPE
22 RECORDS; EMI APRIL MUSIC,
INC.; HEADPHONE JUNKIE
23 PUBLISHING, LLC; WILL.I.AM.
MUSIC, LLC; JEEPNEY MUSIC,
24 INC.; TAB MAGNETIC
PUBLISHING; CHERRY RIVER
25 MUSIC CO.; SQUARE RIVOLI
PUBLISHING; RISTER EDITIONS;
26 and SHAPIRO, BERNSTEIN & CO.,

**DECLARATION OF JUSTIN
RIGHETTINI RE JOINDER OF
ADAMS DEFENDANTS TO REPLY
IN SUPPORT OF MOTION FOR
SANCTIONS AGAINST PLAINTIFF
AND HIS COUNSEL PURSUANT
TO FED. R. CIV. P. 11 BY
DEFENDANTS SHAPIRO,
BERNSTEIN & CO, INC.,
FREDERIC RIESTERER AND
DAVID GUETTA**

Date: April 16, 2012
Time: 10:00 A.M.
Dept.: 10A

Complaint Filed: October 28, 2010
Trial date: August 7, 2012

27 Defendants.
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connection with this case.

7. On March 28, 2011, I used the application Shazam on my iPhone to test what result would obtain if I played the original version of *Take a Dive* into the phone's microphone. Shazam did not recognize the original version of *Take a Dive*, and the message that was displayed on my phone's screen as a result was: "Sorry, a match couldn't be found for your music."

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct.

Executed this 2nd day of April, 2012, at Chicago, Illinois.

/s/ Justin Righettini
Justin Righettini