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 13 **UNITED STATES DISTRICT COURT**
 14 **CENTRAL DISTRICT OF CALIFORNIA**
 15 **SOUTHERN DIVISION**

16 BRYAN PRINGLE, an individual, 17 Plaintiff, 18 v. 19 WILLIAM ADAMS, JR.; STACY 20 FERGUSON; ALLAN PINEDA; and 21 JAIME GOMEZ, all individually and collectively as the music group The Black Eyed Peas, <i>et al.</i> , 22 Defendants.) Case No. SACV 10-1656 JST(RZx))) STIPULATION TO CONTINUE) HEARING ON PLAINTIFF) BRYAN PRINGLE'S MOTION) FOR VOLUNTARY DISMISSAL) OF CERTAIN PARTIES) WITHOUT PREJUDICE AND) WITHOUT FEES OR COSTS)))
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1 This Stipulation is made by and among plaintiff Bryan Pringle (“Plaintiff”)
2 and defendants William Adams, Jr., Stacy Ferguson, Allan Pineda and Jaime Gomez,
3 all individually and collectively as the music group the Black Eyed Peas, UMG
4 Recordings, Inc., Interscope Records, EMI April Music, Inc., Headphone Junkie
5 Publishing, LLC, Will.I.Am, LLC, Jeepney Music, Inc., Tab Magnetic Publishing,
6 Cherry River Music Co., and Square Rivoli Publishing (collectively, “Remaining
7 Defendants”) (Plaintiff and Remaining Defendants are hereafter collectively referred
8 to as the “Parties”), and is made with reference to the following:

9 On Friday, April 6, 2012, Plaintiff filed a motion for voluntary dismissal of the
10 Remaining Defendants without prejudice and without fees or costs pursuant to Rule
11 41(a)(2) of the Federal Rules of Civil Procedure. (ECF Doc. #262.)

12 Upon receiving notice of the filing, on April 6, 2012, counsel for the
13 Remaining Defendants contacted Plaintiff’s counsel and objected to the filing as
14 premature under Local Rule 7-3.

15 On Monday, April 9, 2012, Kara Cengar, lead counsel for several of the
16 Remaining Defendants, reiterated the objection to the filing as premature under
17 Local Rule 7-3, and also reminded Plaintiff’s counsel that she will be traveling and
18 unavailable during the week leading up to the April 16, 2012 deadline for Remaining
19 Defendants’ opposition to the motion. Ms. Cengar requested a continuance of the
20 hearing date so that she may participate in preparing her clients’ opposition to the
21 motion, and suggested that such a continuance would help ameliorate her clients’
22 concerns regarding the prematurity of the filing under Local Rule 7-3.

23 The Parties thereafter met and conferred through counsel and agreed that a one
24 week continuance of the hearing on the motion would resolve Ms. Cengar’s calendar
25 conflict and Remaining Defendants’ concern regarding the prematurity of the filing
26 under Local Rule 7-3.

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1 BASED UPON THE FOREGOING, IT IS HEREBY STIPULATED by and
2 between the Parties, through their respective counsel, subject to the Court’s approval,
3 that:

4 1. The hearing on Plaintiff’s motion for voluntary dismissal of the
5 Remaining Defendants without prejudice and without fees or costs pursuant to Rule
6 41(a)(2) of the Federal Rules of Civil Procedure (ECF Doc. #262) shall be continued
7 to May 14, 2012;

8 2. Remaining Defendants’ papers in opposition to the motion shall be filed
9 on or before April 23, 2012; and

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1 3. Plaintiff's reply papers in further support of the motion, if any, shall be filed
2 on or before April 30, 2012.

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4 Dated: April 10, 2012

Dean A. Dickie (appearing *Pro Hac Vice*)
Kathleen E. Koppenhoefer (appearing *Pro Hac Vice*)
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6 George L. Hampton IV (State Bar No. 144433)
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8 HAMPTONHOLLEY LLP

9 By: /s/ Dean A. Dickie
10 Dean A. Dickie

11 Attorneys for Plaintiff
12 BRYAN PRINGLE

13 Dated: April 10, 2012

Kara E. F. Cenar
Jonathan Pink
Justin Righettini
Mariangela Seale
BRYAN CAVE LLP

17 By: /s/ Kara Cenar
18 Kara E. F. Cenar

19 Attorneys for Defendants WILLIAM ADAMS;
20 ALLAN PINEDA; JAIME GOMEZ, and STACY
21 FERGUSON p/k/a FERGIE all individually and
22 collectively as the music group THE BLACK EYED
23 PEAS; will.i.am music, llc; TAB MAGNETIC
PUBLISHING; HEADPHONE JUNKIE
PUBLISHING, LLC, CHERRY RIVER MUSIC
CO.; JEEPNEY MUSIC, INC., EMI APRIL MUSIC

24 Dated: April 10, 2012

Linda M. Burrow
Alison Mackenzie
CALDWELL LESLIE & PROCTOR, PC

26 By: /s/ Linda Burrow
27 Attorneys for Defendants UMG RECORDINGS,
28 INC., and INTERSCOPE RECORDS

CERTIFICATE OF SERVICE

1 On April 10, 2012, I electronically filed the foregoing STIPULATION TO
2 CONTINUE HEARING ON PLAINTIFF BRYAN PRINGLE'S MOTION FOR
3 VOLUNTARY DISMISSAL OF CERTAIN PARTIES WITHOUT PREJUDICE
4 AND WITHOUT FEES OR COSTS using the CM/ECF system which will send
5 notification of such filing to the following registered CM/ECF Users:
6

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27
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1 I am unaware of any attorneys of record in this action who are not registered
2 for the CM/ECF system or who did not consent to electronic service.

3 I certify under penalty of perjury under the laws of the United States of
4 America that the foregoing statements are true and correct.

5 Dated: April 10, 2012 /s/Colin C. Holley

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