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

17 UNITED STATES DISTRICT COURT  
 18 CENTRAL DISTRICT OF CALIFORNIA  
 19 SOUTHERN DIVISION

20 BRYAN PRINGLE, an individual,  
 21 Plaintiff,  
 22 v.  
 23 WILLIAM ADAMS, JR.; STACY  
 24 FERGUSON; ALLAN PINEDA; and  
 JAIME GOMEZ, all individually and  
 25 collectively as the music group The Black  
 Eyed Peas, et al.,  
 26 Defendants.  
 27

) Case No. SACV 10-1656 JST(RZx)  
 ) Hon. Josephine Staton Tucker  
 )  
 ) **NOTICE OF MOTION**  
 )  
 ) Complaint Filed: October 28, 2010  
 )  
 ) Hearing Date: June 25, 2012;  
 ) 10:00 A.M  
 ) Courtroom 10A

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that, on June 25, 2012 at 10:00 A.M., or as soon  
3 thereafter as counsel may be heard in the courtroom of the Honorable Josephine  
4 Staton Tucker, United States District Judge, Central District of California, located at  
5 the Santa Ana Courthouse, 411 West Fourth Street, Courtroom 10A, Santa Ana, CA  
6 92701-4516, Defendants Shapiro Bernstein & Co., Inc., David Guetta and Frederic  
7 Riesterer (collectively, “Guetta Defendants”); Defendants William Adams, Jr., Stacy  
8 Ferguson, Allan Pineda, Jaime Gomez, all individually and collectively as the music  
9 group The Black Eyed Peas, EMI April Music, Inc., Headphone Junkie Publishing,  
10 LLC, will.i.am. music, llc, Jeepney Music, Inc., Tab Magnetic Publishing, Cherry  
11 River Music Co., and Square Rivoli Publishing (collectively, “Adams Defendants”);  
12 and Defendants UMG Recordings, Inc. and Interscope Records (collectively, “UMG  
13 Defendants”) will and hereby do move for an Order awarding attorney’s fees and  
14 full costs against Plaintiff Bryan Pringle and his counsel—Dean A. Dickie and  
15 Kathleen E. Koppenhoefer, individually as well as jointly and severally with Miller,  
16 Canfield, Paddock & Stone, P.L.C.; Ira P. Gould and Ryan L. Greely, individually  
17 as well as jointly and severally with Gould Law Group; and George L. Hampton IV  
18 and Colin C. Holley, individually as well as jointly and severally with  
19 HamptonHolley LLP—on the following grounds:

- 20 (a) As a sanction pursuant to Rule 11 of the Federal Rules of Civil  
21 Procedure;
- 22 (b) As an award to prevailing parties under the Copyright Act, 17 U.S.C.  
23 § 505;
- 24 (c) As a sanction pursuant to 28 U.S.C. § 1927; and
- 25 (d) As a sanction pursuant to the Court’s inherent authority.
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1 This Motion is based on this Notice of Motion; Defendants' Memorandum  
2 and Points of Authorities; the Declarations of Barry I. Slotnick, Tal E. Dickstein,  
3 Kara E. F. Cenar, Linda M. Burrow, and any other declaration Defendants may file,  
4 and all exhibits thereto; the Court file; any reply Defendants may make; and any  
5 further argument as may be presented to the Court prior to or at the hearing on this  
6 motion, or subsequent thereto as permitted by the Court.

7 This motion is made following Defendants' participation in conferences of  
8 counsel pursuant to Local Rule 7-3 on June 27, 2011 and on May 8, 2012, as well as  
9 the Court's direction at the April 16, 2012 hearing, the Court's Order dated April 16,  
10 2012 (Doc. 270), and the Judgment dated May 15, 2012 (Doc. 276).

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12 Dated: May 25, 2012

LOEB & LOEB LLP

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14 By: /s/ Barry I. Slotnick

Donald A. Miller  
Barry I. Slotnick  
Tal E. Dickstein

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16 Attorneys for Defendants  
17 SHAPIRO, BERNSTEIN & CO., INC.,  
18 FREDERIC RIESTERER and DAVID  
19 GUETTA

20 BRYAN CAVE LLP

21 By: /s/ Jonathan Pink

22 Jonathan Pink  
23 Justin M. Righettini  
24 Kara Cenar  
25 Mariangela Seale

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

CALDWELL LESLIE & PROCTOR, PC

By: /s/ Linda M. Burrow  
Linda M. Burrow  
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INTERSCOPE RECORDS

MCPHERSON RAINE LLP

By: /s/ Ed McPherson  
Ed McPherson

Attorneys for Defendant STACY FERGUSON p/k/a FERGIE, and HEADPHONE JUNKIE PUBLISHING LLC

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