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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
) **[PROPOSED] ORDER GRANTING**
) **DEFENDANTS' MOTION FOR AN**
) **AWARD OF ATTORNEYS' FEES AND**
) **FULL COSTS AGAINST PLAINTIFF**
) **AND HIS COUNSEL**
) Complaint Filed: October 28, 2010
) Hearing Date: June 25, 2012;
) 10:00 A.M
) Courtroom 10A

PROPOSED ORDER

1 Having considered the Motion by Defendants Shapiro Bernstein & Co., Inc.,
2 David Guetta and Frederic Riesterer (collectively, “Guetta Defendants”);
3 Defendants William Adams, Jr., Stacy Ferguson, Allan Pineda, Jaime Gomez, all
4 individually and collectively as the music group The Black Eyed Peas, EMI April
5 Music, Inc., Headphone Junkie Publishing, LLC, will.i.am. music, llc, Jeepney
6 Music, Inc., Tab Magnetic Publishing, Cherry River Music Co., and Square Rivoli
7 Publishing (collectively, “Adams Defendants”); and Defendants UMG Recordings,
8 Inc. and Interscope Records (collectively, “UMG Defendants”) for an Order
9 awarding attorney’s fees and full costs against Plaintiff Bryan Pringle and his
10 counsel—Dean A. Dickie and Kathleen E. Koppenhoefer, individually as well as
11 jointly and severally with Miller, Canfield, Paddock & Stone, P.L.C.; Ira P. Gould
12 and Ryan L. Greely, individually as well as jointly and severally with Gould Law
13 Group; and George L. Hampton IV and Colin C. Holley, individually as well as
14 jointly and severally with HamptonHolley LLP—for an award of attorney’s fees and
15 full costs against Plaintiff and his counsel, the Court hereby GRANTS the Motion in
16 full and awards attorneys’ fees and costs against Plaintiff and his counsel on each of
17 the following independent grounds:

- 18 (a) As a sanction pursuant to Rule 11 of the Federal Rules of Civil
19 Procedure;
- 20 (b) As an award to prevailing parties under the Copyright Act, 17 U.S.C.
21 § 505;
- 22 (c) As a sanction pursuant to 28 U.S.C. § 1927; and
- 23 (d) As a sanction pursuant to the Court’s inherent authority.

24 The Court hereby awards the Guetta Defendants attorneys’ fees in the amount of
25 \$_____, and full non-taxable costs in the amount of \$_____; the Adams
26 Defendants attorneys’ fees in the amount of \$_____, and full non-taxable
27 costs in the amount of \$_____; and the UMG Defendants attorneys’ fees in the
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amount of \$_____, and full non-taxable costs in the amount of \$_____.

Plaintiff and his counsel are fully, jointly, and severally liable for such amounts, and shall pay such amounts to the Guetta Defendants, Adams Defendants, and UMG Defendants within sixty (60) days of entry of this Order.

Dated: _____, 2012

By: _____
Hon. Josephine Staton Tucker
United States District Judge