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 8 RIESTERER, AND DAVID GUETTA

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 10 UNITED STATES DISTRICT COURT
 11 CENTRAL DISTRICT OF CALIFORNIA
 12 SOUTHERN DIVISION

13 BRYAN PRINGLE, an individual,
 14 Plaintiff,
 15 v.
 16 WILLIAM ADAMS, JR.; STACY
 FERGUSON; ALLAN PINEDA; and
 17 JAIME GOMEZ, all individually and
 collectively as the music group The
 18 Black Eyed Peas, et al.,
 19 Defendants.
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Case No. SACV 10-1656 JST(RZx)
 Hon. Josephine Staton Tucker
 Courtroom 10A

**DECLARATION OF TAL E.
 DICKSTEIN IN SUPPORT OF
 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

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 support of Defendants' Motion for an
8 Award of Attorneys' Fees and Full Costs Plaintiff Bryan Pringle and his Counsel.

9 2. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts of
10 the deposition transcript of Bryan Pringle, dated August 24, 2011.

11 3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts of
12 Plaintiff's Response to Defendant Stacey Ferguson's First Set of Interrogatories,
13 served April 13, 2011, with relevant portions highlighted.

14 4. Attached hereto as **Exhibit 3** is a true and correct copy of the transcript
15 of the January 23, 2012 Court hearing on Defendants' Motion to Compel
16 Supplemental Responses to Interrogatories from Plaintiff and for Sanctions.

17 5. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts of
18 Plaintiff's Rule 26 Disclosures, dated February 28, 2011, with relevant portions
19 highlighted.

20 6. Attached hereto as **Exhibit 5** is a true and correct copy of Plaintiff's
21 Notice of Document Subpoena to Taxi Music Network, dated June 23, 2011, and
22 documents produced pursuant to that subpoena bearing production numbers TAXI
23 0001 - TAXI 0011.

24 7. Attached hereto as **Exhibit 6** is a true and correct copy of excerpts of
25 Plaintiff's Response to Defendant William Adams' First Set of Interrogatories,
26 served April 13, 2011, with relevant portions highlighted.

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1 8. Attached hereto as **Exhibit 7** is a true and correct copy of excerpts of
2 Plaintiff's Supplemental Response to Defendant William Adams' First Set of
3 Interrogatories, served July 15, 2011.

4 9. Attached hereto as **Exhibit 8** is a true and correct copy of excerpts of
5 the deposition transcript of Alexander Norris, dated January 3, 2012.

6 10. Attached hereto as **Exhibit 9** is a true and correct copy of excerpts of
7 the deposition transcript of Alexander Stewart, dated January 4, 2012.

8 11. Attached hereto as **Exhibit 10** is a true and correct copy of excerpts of
9 a letter from counsel for Plaintiff to counsel for Defendants, dated August 30, 2010,
10 which was produced in discovery bearing production numbers P-UMG 005985 - P-
11 UMG 005991, with relevant portions highlighted.

12 12. Attached hereto as **Exhibit 11** is a true and correct copy of excerpts of
13 Plaintiff's Amended Answers to Defendant Headphone Junkie Publishing, LLC's
14 First Set of Interrogatories, served November 2, 2011, with relevant portions
15 highlighted.

16 13. Attached hereto as **Exhibit 12** is a true and correct copy of the
17 transcript of the January 31, 2011 hearing on Plaintiff's motion for a preliminary
18 injunction.

19 14. Attached hereto as **Exhibit 13** is a true and correct copy of the
20 complaint filed in the matter *Pringle, et al., v. USAA Insurance Agency, Inc.*, filed in
21 the District Court, 224th Judicial District, Bexar County, Texas.

22 15. Attached hereto as **Exhibit 14** is a true and correct copy of excerpts of
23 the deposition transcript of Bryan D. Pringle, and Exhibit 15 thereto, taken in the
24 matter *Pringle, et al., v. USAA Insurance Agency, Inc.*, filed in the District Court,
25 224th Judicial District, Bexar County, Texas, with relevant portions highlighted.

26 16. Attached hereto as **Exhibit 15** is a true and correct copy of excerpts of
27 Plaintiff's Response to Defendant David Guetta's First Set of Interrogatories, served
28 November 14, 2011, with relevant portions highlighted.

