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17 Attorneys for Plaintiff  
BRYAN PRINGLE  
18

19 **UNITED STATES DISTRICT COURT**  
20 **CENTRAL DISTRICT OF CALIFORNIA**  
21 **SOUTHERN DIVISION**

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

) Case No. SACV 10-1656 JST(RZx)  
) **PLAINTIFF'S AMENDED**  
) **ANSWERS TO DEFENDANT**  
) **HEADPHONE JUNKIE**  
) **PUBLISHING, LLC'S FIRST SET**  
) **OF INTERROGATORIES**

1 PROPOUNDING Defendant HEADPHONE JUNKIE PUBLISHING,  
2 PARTY: LLC  
3 RESPONDING PARTY: Plaintiff BRYAN PRINGLE  
4 SET NO.: One

5 Plaintiff Bryan Pringle (“Pringle” or “Plaintiff”) submits these Amended  
6 Answers to Defendant Headphone Junkie Publishing, LLC’s (“Headphone Junkie” or  
7 “Defendant”) First Set of Interrogatories (the “Interrogatories”):

8 **GENERAL OBJECTIONS**

9  
10 1. Pringle objects to each interrogatory insofar as it is vague, overly broad,  
11 not limited in time and scope, oppressive, harassing or vexatious, imposes burden or  
12 expense that outweighs the likely benefit, seeks legal conclusions, and/or seeks  
13 information not relevant to the lawsuit nor reasonably calculated to lead to the  
14 discovery of admissible evidence.

15 2. Pringle objects to the extent that these interrogatories seek information  
16 protected by the attorney/client or the work product privilege. Pringle will not  
17 provide any such privileged information.

18 3. The following answers are given based upon the information and  
19 documents of which Pringle’s counsel is currently aware. Pringle’s investigation  
20 continues and Pringle specifically reserves the right to supplement the following  
21 answers as this litigation proceeds. The following answers are given herein without  
22 prejudice to Pringle’s right to supplement or change his answers or objections and to  
23 produce evidence of additional facts.

24 4. Pringle’s answers are not an admission that any such information is  
25 relevant or admissible.

26 5. Pringle objects to each interrogatory, instruction or definition that  
27 purports to impose any obligation greater than or different from those required under  
28 the Federal Rules of Civil Procedure and Local Orders of the Court.

1 expert, for the purpose of demonstrating how to use the ASR-10  
2 keyboard. Plaintiff further states that he had telephonic and email  
3 contact with Dave Gallant but does not recall the dates of such contact.  
4

5 **INTERROGATORY NO. 24:** Provide the date when Mr. Pringle allegedly  
6 placed his musical equipment in the storage unit reflected in his police report  
7 produced in this case.

8 **ANSWER:** Objection. Plaintiff objects to Interrogatory No. 24 because  
9 it is overly broad, unduly burdensome and not likely to lead to the  
10 discovery of relevant evidence. Without waiving said objections,  
11 Plaintiff states that his music equipment was placed in the storage unit  
12 sometime during 2000 and prior to October 2000. Plaintiff does not  
13 recall the specific date or dates on which his music equipment was  
14 placed in storage.  
15  
16

17 **INTERROGATORY NO. 25:** If you contend that any Defendant has infringed  
18 any copyright of Plaintiff Bryan Pringle other than Take A Dive or Take A Dive  
19 (Dance Version), provide a complete factual basis for contending that they  
20 Defendant had access and that the accused work is substantially similar.

21 **ANSWER:** Objection. Plaintiff objects to Interrogatory No. 25 because  
22 it is overly broad, unduly burdensome and not likely to lead to the  
23 discovery of relevant evidence. Without waiving said objections, at this  
24 particular time, Plaintiff states that David Guetta's song "Love is Gone"  
25 contains the guitar twang sequence of "Take a Dive" and as stated in his  
26 deposition, the Defendants may have infringed "If We Ever," "One  
27 Love," "Meet Me Halfway," "Someday," "Where Them Girls At,"  
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“Best One Yet,” “One More Chance,” “Invisible,” and “Showdown.”

Investigation continues.

Dated: November 2, 2011

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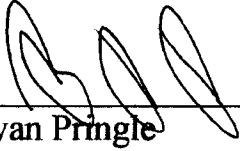
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By:   
Attorneys for Plaintiff Bryan Pringle

**VERIFICATION**

I, Bryan Pringle, state that the answers made to Defendant Headphone Junkie Publishing, LLC's First Set of Interrogatories are true and correct to the best of my knowledge. I declare the foregoing to be true under penalty of perjury.

  
\_\_\_\_\_  
Bryan Pringle

November 2, 2011

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