

HAMPTONHOLLEY LLP
2101 East Coast Highway, Suite 260
Corona del Mar, California 92625

1 Dean A. Dickie (appearing *Pro Hac Vice*)
Dickie@MillerCanfield.com
2 Kathleen E. Koppenhoefer (appearing *Pro Hac Vice*)
Koppenhoefer@MillerCanfield.com
3 Katharine N. Dunn (appearing *Pro Hac Vice*)
Dunn@MillerCanfield.com
4 MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.
225 West Washington Street, Suite 2600
5 Chicago, IL 60606
Telephone: 312.460.4200
6 Facsimile: 312.460.4288

7 Ira Gould (appearing *Pro Hac Vice*)
Gould@igouldlaw.com
8 Ryan L. Greely (appearing *Pro Hac Vice*)
Rgreely@igouldlaw.com
9 GOULD LAW GROUP
120 North LaSalle Street, Suite 2750
10 Chicago, IL 60602
Telephone: 312.781.0680
11 Facsimile: 312.726.1328

12 George L. Hampton IV (State Bar No. 144433)
ghampton@hamptonholley.com
13 Colin C. Holley (State Bar No. 191999)
cholley@hamptonholley.com
14 HAMPTONHOLLEY LLP
2101 East Coast Highway, Suite 260
15 Corona del Mar, California 92625
Telephone: 949.718.4550
16 Facsimile: 949.718.4580

17 Attorneys for Plaintiff
BRYAN PRINGLE
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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 SUPPLEMENTAL**
) **RESPONSE TO DEFENDANT**
) **WILLIAM ADAMS' FIRST SET**
) **OF INTERROGATORIES**
) **Complaint Filed: October 28, 2010**
) **Trial Date: January 24, 2012**

1 PROPOUNDING PARTY: Defendant WILLIAM ADAMS
2 RESPONDING PARTY: Plaintiff BRYAN PRINGLE
3 SET NO.: One
4

5 Plaintiff Bryan Pringle submits this Supplemental Answer to Defendant,
6 William Adams' ("Adams"), First Set of Interrogatories (the "Interrogatories").
7

8 **GENERAL OBJECTIONS**

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

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

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

23 4. Plaintiff's answers are not an admission that any such information is
24 relevant or admissible.

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

28 6. Plaintiff specifically reserves the right to assert additional objections.

1 **INTERROGATORY NO. 5:** IDENTIFY all other PERSONS besides YOU who
2 assisted with, participated in, have knowledge concerning, or are in any way
3 connected with, the creation of the MUSICAL COMPOSITION , TAKE A DIVE.

4 **ANSWER:** No supplementation required.

5
6 **INTERROGATORY NO. 6:** IDENTIFY all other PERSONS besides YOU who a
7 who assisted with, participated in, have knowledge concerning, or are in any way
8 connected with, the creation of TAKE A DIVE SR, including by rendering a
9 performance of the MUSICAL COMPOSITION embodied therein.

10 **ANSWER:** No supplementation required.

11 **INTERROGATORY NO. 7:** Do YOU claim that the MUSICAL
12 COMPOSITION, TAKE A DIVE, was infringed by DEFENDANTS?

13 **ANSWER:** No supplementation required.

14
15 **INTERROGATORY NO. 8:** If YOU responded to Interrogatory No. 7, above, in
16 the affirmative, state all FACTS that YOU contend demonstrate that any of the
17 DEFENDANTS had ACCESS to the MUSICAL COMPOSITION, TAKE A DIVE,
18 prior to 2009. The term "ACCESS" as used herein means to have actually heard, or
19 had a reasonable opportunity or possibility to hear, the MUSICAL COMPOSITION
20 at issue.

21 **ANSWER:** Objection. Plaintiff objects to Interrogatory No. 8 because it is
22 overly broad, unduly burdensome and to the extent that it seeks a legal
23 conclusion. Without waiving said objections, Plaintiff points to the striking
24 similarity between "Take a Dive (Dance Version)" and "I Gotta Feeling."
25 Plaintiff also points Defendants to his original Answer to Interrogatory No. 21,
26 which lists several of the persons/entities that were sent copies of "Take a
27 Dive (Dance Version)," including Joachim Garraud – a known music associate
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concerning when, where, by what means, by whom TAKE A DIVE was performed or distributed, and to whom it was distributed.

ANSWER: No supplementation required.

INTERROGATORY NO. 25: To the extent not covered by Interrogatories Nos. 22 and 23 above, state with specificity all non-public or limited exploitations, throughout the world, of TAKE A DIVE SR, including all such performances and dispositions of PHONORECORDS thereof, as well as the activities YOU reference in Paragraphs 31 and 32 of YOUR COMPLAINT. In connection with such non-public or limited exploitations, YOU are to state all FACTS concerning when, where, by what means, by whom TAKE A DIVE SR was performed or distributed, and to whom it was distributed.

ANSWER: No supplementation required.

Dated: July 15, 2011

Dean A. Dickie (appearing Pro Hac Vice)
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HAMPTONHOLLEY LLP

By: 
Attorneys for Plaintiff Bryan Pringle

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VERIFICATION

I, Bryan Pringle, state that I have knowledge of the foregoing events, and that the supplemental answers made to Defendant Adams' First Set of Interrogatories are true and correct.

I declare the foregoing to be true under penalty of perjury.



Bryan Pringle

July 15, 2011.

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