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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
) **AMENDED NOTICE OF MOTION**
)
) Complaint Filed: October 28, 2010
)
) Hearing Date: July 2, 2012;
) 10:00 A.M
) Courtroom 10A

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that, on July 2, 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).

11 This motion was previously noticed for hearing on June 25, 2012, which date
12 has been closed for hearings by the Court. This motion is now being re-scheduled
13 for hearing on July 2, 2012, the next available hearing date.

14
15 Dated: May 31, 2012

LOEB & LOEB LLP

16
17 By: /s/ Barry I. Slotnick

18 Donald A. Miller
19 Barry I. Slotnick
20 Tal E. Dickstein

21 Attorneys for Defendants
22 SHAPIRO, BERNSTEIN & CO., INC.,
23 FREDERIC RIESTERER and DAVID
24 GUETTA

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26 BRYAN CAVE LLP

27 By: /s/ Jonathan Pink

28 Jonathan Pink
Justin M. Righettini
Kara Cenar
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

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