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6 Attorneys for Defendants SHAPIRO,
 BERNSTEIN & CO., INC. (incorrectly
 7 sued as Shapiro, Bernstein & Co.);
 RISTER EDITIONS and DAVID
 8 GUETTA

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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
 Courtroom 10A

**DECLARATION OF KAREN R.
 THORLAND IN SUPPORT OF
 DEFENDANTS SHAPIRO,
 BERNSTEIN & CO., INC.'S,
 RISTER EDITIONS' AND DAVID
 GUETTA'S MOTION TO DISMISS
 THE FIRST AMENDED
 COMPLAINT**

Date: January 24, 2011
 Time: 10:00 A.M.
 Dept.: 10A

Complaint Filed: October 28, 2010
 Trial Date: Not Assigned

1 I, Karen R. Thorland, declare:

2 1. I am an attorney licensed to practice before the Courts of the State of
3 California and am admitted to practice in this Court. I am a partner with the law
4 firm of Loeb & Loeb LLP, attorneys for Defendants Shapiro Bernstein & Co., Inc.
5 (“Shapiro Bernstein”), Rister Editions and David Guetta (together “Defendants”). I
6 submit this declaration in support of Defendants’ Motion to Dismiss the First
7 Amended Complaint, and to submit the document referenced below for the Court’s
8 consideration.

9 2. Attached hereto as Exhibit 1 is a true and correct copy of a letter dated
10 December 8, 2010 from my partner Barry Slotnick, counsel for Shapiro Bernstein,
11 to counsel for Plaintiff, advising Plaintiff that “Shapiro Bernstein is not an agent for
12 service of process and is not authorized to accept service” on behalf of Frederic
13 Riesterer, Rister Editions or Square Rivoli Publishing.

14 I declare under penalty of perjury under the laws of the United States of
15 America that the foregoing is true and correct. Executed on December 13, 2010, at
16 Los Angeles, California.

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19 KAREN R. THORLAND

EXHIBIT 1



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December 8, 2010

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Re: Bryan Pringle v. William Adams, Jr., et al., Case No. SACV10-1656 JST (RZx)

Gentlemen:

As you are aware, we are the attorneys for Shapiro Bernstein & Co., Inc. ("Shapiro Bernstein"). We have just been engaged to represent David Guetta, Frederic Riesterer, and Rister Editions. I would like to schedule a meet and confer telephone call to discuss deficiencies both as to service of process and substantive elements of the Amended Complaint.

Specifically, we note that plaintiffs purport to have effected service on Frederic Riesterer, Rister Editions and Square Rivoli Publishing by virtue of service of process upon Shapiro Bernstein. Please be advised that Shapiro Bernstein is not an agent for service of process and is not authorized to accept service on their respective behalves. Consequently, we consider service upon these parties to be defective.

On a substantive basis, while you allege an infringement based upon a derivative work of your client's original work, you have provided neither a copy of the registration certificate for the derivative work submitted to the United States Copyright Office nor the deposit copy submitted therewith. As such, my clients have not been placed on notice with respect to access or substantial or striking similarity. Indeed, the Amended Complaint purports to allege a course of conduct whereby certain other defendants had access to your client's work, but is silent as to our clients. Inasmuch, as these substantive issues were addressed in a prior meet and confer with all defense counsel, we are notifying you of our joinder with the other defendants in this regard.



George Hampton, Esq.
Dean Dickie, Esq.
Ira Gould, Esq.
December 8, 2010
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I look forward to being in communication with one or more of you to discuss these issues. I recognize the lateness of the hour, but I shall be monitoring all calls to my office this evening and will return your calls promptly.

Very truly yours,

A handwritten signature in black ink, appearing to read 'B. Slotnick', written over a horizontal line.

Barry I. Slotnick
Partner