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6 Attorneys for Defendants  
 UMG RECORDINGS, INC. and  
 7 INTERSCOPE RECORDS

8 **UNITED STATES DISTRICT COURT**  
 9 **CENTRAL DISTRICT OF CALIFORNIA**  
 10 **SOUTHERN DIVISION**

12 BRYAN PRINGLE, an individual,  
 13 Plaintiff,  
 14 v.  
 15 WILLIAM ADAMS, JR.; STACY  
 16 FERGUSON; ALAN PINEDA; and  
 JAIME GOMEZ, all individually and  
 17 collectivley as the music group the  
 Black Eyed Peas; DAVID GUETTA;  
 18 FREDERICK RIESTERER; UMG  
 RECORDINGS, INC.; INTERSCOPE  
 19 RECORDS; EMI APRIL MUSIC,  
 INC.; HEAPHONE JUNKIE  
 20 PUBLISHING, LLC.; WILL.I.AM  
 MUSIC, LLC; JEEPNEY MUSIC,  
 21 INC.; TAB MAGNETIC  
 PUBLISHING; CHERRY RIVER  
 22 MUSIC, CO.; SQUARE RIVOLI  
 PUBLISHING; RISTER EDITIONS;  
 23 and SHAPIRO, BERNSTEIN & CO.,  
 24 Defendants.

Case No. SACV 10-1656 JST (RZx)  
**DECLARATION OF TOM  
 ROWLAND IN SUPPORT OF  
 JOINDER TO OPPOSITION AND  
 OPPOSITION TO MOTION FOR  
 PRELIMINARY INJUNCTION**  
 Hearing Date: January 31, 2011  
 Time: 10:00 a.m.  
 Courtroom 10A  
 Trial Date: None Set

1 **DECLARATION OF TOM ROWLAND**

2  
3 I, TOM ROWLAND, declare and state as follows:

4 1. I am Senior Vice-President, Film and Television Music, of Universal  
5 Music Enterprises (“UME”), a division of Defendant UMG Recordings, Inc. I have  
6 held this position at UME or a similar position at all times since 1991. I submit this  
7 declaration in opposition to Plaintiff Bryan Pringle’s Motion for Preliminary  
8 Injunction. I have personal knowledge of the facts stated herein unless otherwise  
9 specified, and could and would testify competently thereto if called as a witness in  
10 this matter.

11 2. UME is the division of UMG Recordings responsible for, among other  
12 things, the licensing and ancillary exploitation of the sound recordings owned by  
13 UMG Recordings, Inc. and affiliated entities such as Defendant Interscope Records,  
14 for use in audiovisual works, such as television programs, commercials, films and  
15 video games (“Ancillary Exploitations”).

16 3. In my capacity as Senior Vice-President, Film and Television Music for  
17 UME, I am familiar with the revenue generated by Ancillary Exploitations of sound  
18 recordings licensed by UME and with UME’s records reflecting such revenue. In  
19 the ordinary course of business, I am also responsible for projecting future revenues  
20 from such Ancillary Exploitations, for both financial planning and valuation  
21 purposes.

22 4. I understand that the Plaintiff in this action is seeking an injunction that  
23 would, among other things, prohibit UME from licensing the sound recording of the  
24 Black Eyed Peas’ song “I Gotta Feeling” for Ancillary Exploitation. According to  
25 UME’s records, to date, “I Gotta Feeling” has generated more than \$650,000 in  
26 license revenue to UME from Ancillary Exploitations. It is among the top ten  
27 revenue-generating recordings for UME from 2007 through 2010.

