

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

RALPH VARGAS and
BLAND-RICKY ROBERTS

Plaintiffs

vs.

PFIZER INC., PUBLICIS, INC., FLUID MUSIC,
EAST WEST COMMUNICATIONS, INC. and
BRIAN TRANSEAU p/k/a "BT"

Defendants

CASE NO.: 04 CV 9772 (WHP)
(JCF)

ECF CASE

PLAINTIFFS' INITIAL DISCLOSURES

Pursuant to the Order of Judge William H. Pauley, III, dated June 9, 2005, Plaintiffs Ralph Vargas and Bland-Ricky Roberts, by and through their attorney, Paul A. Chin, Esq., submits their Initial Disclosures as required by Rule 26(a)(1) and 26(a)(2) of the Federal Rule of Civil Procedure.

I. RULE 26(a) (1) INITIAL DISCLOSURES

A. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION THAT MAY BE USED TO SUPPORT PLAINTIFFS' CLAIMS

Plaintiffs' Initial Disclosures are made without the benefit of any discovery from Defendants and prior to receiving Defendants' answers. Plaintiffs reserve the right to supplement their disclosures to add additional witnesses.

- 1) Ralph Vargas
140 W. 104th Street Apt. 10-H
New York, NY 10025

As creator, composer, producer and arranger of the Composition, Mr. Vargas has knowledge of the facts of this case.

- 2) Bland-Ricky Roberts
RR18 Box 6006

East Stroudsburg, PA 18301

As owner of Composition copyright and master sound recording,
Mr. Roberts has knowledge of the facts of this case.

- 3) All named defendants.

B. CATEGORIES AND LOCATION OF DOCUMENTS & TANGIBLE THINGS

Plaintiffs' Initial Disclosures are made without the benefit of any discovery from Defendants and prior to receiving Defendants' answers. Plaintiffs reserve the right to supplement their disclosures to add additional documents and tangible things.

The following is a list of documents, data compilations, and tangible things currently in Plaintiffs' possession, custody, or control that Plaintiffs may use to support their claims. Copies of all documents listed below are located at the offices of Plaintiffs' attorneys.

- a. Copyright Registration for the Composition;
- b. Computer analysis of the Composition and the infringing Commercial;
- c. Compact Disc containing the Composition and the infringing Commercial;
and
- d. Compact Disc entitled "Breakz from the Nu Skool" by Defendant Brian Transeau;

C. INFORMATION RELATED TO CALCULATIONS OF DAMAGES

Plaintiffs' Initial Disclosures are made without the benefit of any discovery from Defendants and prior to receiving Defendants' answers. Plaintiffs reserve the right to supplement their disclosures to add additional information related to the calculation of Plaintiffs' damages in this case.

a. Plaintiffs seek monetary damages to be calculated based on their actual damages and Defendants' gross revenue or profits derived from their willful infringement of Plaintiffs' musical composition;

b. Alternatively, Plaintiffs may elect to be awarded, and therefore are entitled to the maximum amount of statutory damages with respect to each work infringed and each act of infringement;

c. Plaintiffs also seek costs, reasonable attorney's fees and prejudgment interest; therefore, Plaintiffs' attorneys' timesheets for services rendered in this action may be used, subject to issues regarding privilege, to calculate Plaintiffs' reasonable attorneys' fees and costs.

D. INSURANCE

Plaintiffs' Initial Disclosures are made without the benefit of any discovery from Defendants and prior to receiving Defendants' answers. Plaintiffs reserve the right to supplement their disclosures to add information regarding any relevant insurance agreements.

At this time, there is no relevant insurance agreement available for disclosure.

II. RULE 26(a) (2) DISCLOSURE

Plaintiffs' Rule 26(a) (2) disclosure is made without the benefit of any discovery from Defendants and prior to receiving Defendants' answers. Plaintiffs reserve the right to supplement their disclosure to add additional expert witness information.

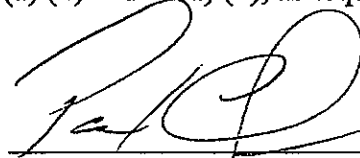
Notwithstanding the requirements of Rule 26(a) (2) of the Federal Rules of Civil Procedure, the parties in this action have agreed to provide the name of their respective expert(s) who will offer opinion testimony in this action.

Plaintiffs designate Matthew Ritter as its music/drum expert. Mr. Ritter's expert opinion will be offered by Plaintiffs in support of their claims and in opposition to Defendants' Motion for Summary Judgment.

Plaintiffs also designate Ivan Rodriguez as its music/sampling/engineer expert. Mr. Rodriguez's Mr. Ritter's expert opinion will be offered by Plaintiffs in support of their claims.

Pursuant to Rule 26(e) of the Federal Rules of Civil Procedure, Plaintiffs will supplement their Initial Disclosures, under Rules 26(a) (1) and 26(a) (2), as required.

Dated: June 24, 2005
New York, New York



Paul A. Chin, Esq. (PC9656)
Law Offices of Paul A. Chin
233 Broadway, 5th Floor
New York, NY 10279
(212) 964-8030
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE


On the 24th day of June, 2005, a true and correct copy of PLAINTIFFS' INITIAL DISCLOSURES was served by via fax and first-class mail, postage pre-paid, and placed in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York, to the following the attorneys representing the Defendants:

Bruce P. Keller, Esq.
Debevoise & Plimpton
919 Third Avenue
New York, NY 10022
(f) (212) 909-6836
Counsel for Defendant Pfizer

Edward P. Kelly, Esq.
Tiajolloff & Kelly
Chrysler Building, 37th Floor
405 Lexington Avenue
New York, NY 10174
(f) (212) 490-3295
Counsel for Defendant Fluid Music

Samuel M. Leaf, Esq.
Davis Wright Tremaine LLP
1633 Broadway
New York, NY 10019
(f) (212) 489-8340
Counsel for Defendants East West and Brian Transeau

Sara L. Edelman, Esq.
Davis & Gilbert, LLP
1740 Broadway
New York, NY 10019
(f) (212) 974-7036
Counsel for Defendant Publicis


Paul A. Chin, Esq. (PC9656)
Law Offices of Paul A. Chin
233 Broadway, 5th Floor
New York, NY 10279
Attorneys for Plaintiffs