

FILED

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2013 AUG 15 PM 3:34  
CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

BY \_\_\_\_\_

9 Attorneys for Plaintiffs PHARRELL  
10 WILLIAMS, ROBIN THICKE and  
11 CLIFFORD HARRIS, JR.

12 UNITED STATES DISTRICT COURT  
13 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

14 PHARRELL WILLIAMS, an  
15 individual; ROBIN THICKE, an  
16 individual; and CLIFFORD HARRIS,  
17 JR., an individual,

18 Plaintiffs,

19 vs.

20 BRIDGEPORT MUSIC, INC., a  
21 Michigan corporation; FRANKIE  
22 CHRISTIAN GAYE, an individual;  
23 MARVIN GAYE III, an individual;  
24 NONA MARVISA GAYE, an  
25 individual; and DOES 1 through 10,  
26 inclusive,

27 Defendants.

28 **CV 13-06004-JAK**  
CASE NO. (AGG)

**COMPLAINT FOR  
DECLARATORY RELIEF**

29 Plaintiffs Pharrell Williams, Robin Thicke, and Clifford Harris, Jr.  
30 (collectively, "plaintiffs") allege as follows:

31 **INTRODUCTION**

32 1. Plaintiffs, who have the utmost respect for and admiration of Marvin  
33 Gaye, Funkadelic and their musical legacies, reluctantly file this action in the face of  
34 multiple adverse claims from alleged successors in interest to those artists.  
35 Defendants continue to insist that plaintiffs' massively successful composition,

1 “Blurred Lines,” copies “their” compositions. In the case of the Marvin Gaye-  
 2 related defendants (the “Gaye defendants”), it’s a song called “Got To Give It Up.”  
 3 For the owner of Funkadelic’s songs, Bridgeport Music, Inc. (“Bridgeport”), it’s a  
 4 song called “Sexy Ways.” But there are no similarities between plaintiffs’  
 5 composition and those the claimants allege they own, other than commonplace  
 6 musical elements. Plaintiffs created a hit and did it without copying anyone else’s  
 7 composition.

8 2. The basis of the Gaye defendants’ claims is that “Blurred Lines” and  
 9 “Got To Give It Up” “feel” or “sound” the same. Being reminiscent of a “sound” is  
 10 not copyright infringement. The intent in producing “Blurred Lines” was to evoke  
 11 an era. In reality, the Gaye defendants are claiming ownership of an entire genre, as  
 12 opposed to a specific work, and Bridgeport is claiming the same work.

13 3. The reality is that the songs themselves are starkly different. Since that  
 14 is the salient factor in a claim for copyright infringement, in the face of the threats of  
 15 defendants to commence lawsuits, plaintiffs must seek declaratory relief from this  
 16 Court that confirms plaintiffs’ unfettered right to exploit “Blurred Lines” free of  
 17 defendants’ claims.

18 **JURISDICTION AND VENUE**

19 4. This action is brought, and this Court has subject matter jurisdiction,  
 20 pursuant to 28 U.S.C. Sections 1331, 1338 and 2201. This Court has federal  
 21 question jurisdiction in this matter in that plaintiffs seek a declaration of rights under  
 22 the Copyright Act of 1976, 17 U.S.C. § 101 *et seq.*

23 5. Venue lies within this Court pursuant to 28 U.S.C. Sections  
 24 1391(b)(2)-(3), (c), (d) and 1400(a) in that defendants Frankie Christian Gaye and  
 25 Marvin Gaye III are domiciled and reside for venue purposes and are subject to  
 26 personal jurisdiction in this district; that, on information and belief, defendant Nona  
 27 Marvisa Gaye is a part-time resident of this district; and that she and defendant  
 28 Bridgeport Music, Inc. (“Bridgeport”) regularly and systematically conduct business

1 in this district and, therefore, are subject to personal jurisdiction in this district.

2 **THE PARTIES**

3 6. Plaintiffs are the composers of the multinational hit song “Blurred  
4 Lines,” which was released in or about March 2013. “Blurred Lines” has garnered  
5 more than 140 *million* views on YouTube.com.

6 7. On information and belief, Bridgeport is and at all times material herein  
7 has been a corporation organized and existing under the laws of the State of  
8 Michigan and is in the business of acquiring and exploiting copyright interests in  
9 musical compositions, and in the business of trolling for opportunities to threaten to  
10 sue and to sue musicians, performers, producers and others in the music industry for  
11 infringement of its copyrights. Bridgeport regularly and systematically does  
12 business in the state of California by, among other things, negotiating and granting  
13 licenses to use the songs in which it has a copyright interest to licensees in  
14 California and resorting to the California courts. Bridgeport has claimed an  
15 ownership interest in the copyright to the composition “Sexy Ways” written by  
16 George Clinton and Grace Cook.

17 8. On information and belief, defendant Frankie Christian Gaye is and at  
18 all times material herein has been an individual residing in Los Angeles County,  
19 California.

20 9. On information and belief, defendant Marvin Gaye III is and at all  
21 times material herein has been an individual residing in Los Angeles County,  
22 California.

23 10. On information and belief, defendant Nona Marvisa Gaye is and at all  
24 times material herein has been an individual residing in Los Angeles County  
25 California and the State of Rhode Island, who regularly conducts business as an  
26 entertainer in the County of Los Angeles, California. Defendants Frankie Christian  
27 Gaye, Marvin Gaye III and Mona Marvisa Gaye are referred to collectively  
28 hereinafter as “the Gayes.”

1 11. Plaintiffs are informed and believe that the Gayes claim an ownership  
2 interest in the composition "Got To Give It Up" by Marvin Gaye.

3 12. Defendant Does 1 through 10, inclusive, are sued herein under  
4 fictitious names. Their true names and capacities are unknown to plaintiffs. When  
5 their true names and capacities are ascertained, plaintiffs will amend this complaint  
6 by inserting their true names and capacities herein.

7 13. On information and belief at all times material herein each of the  
8 defendants was the agent and employee of some or all of the other defendants, and  
9 in doing the things hereinafter alleged, was acting within the course and scope of  
10 such agency and employment.

11 **CLAIM FOR DECLARATORY RELIEF**

12 14. Plaintiffs are informed and believe that Bridgeport owns some or all of  
13 the copyright in the composition "Sexy Ways" and that Bridgeport alleges that  
14 plaintiffs have infringed that composition by including elements of it in "Blurred  
15 Lines" without Bridgeport's knowledge or consent. Representatives of Bridgeport  
16 have recently notified plaintiffs that, if plaintiffs do not pay a monetary settlement of  
17 Bridgeport's claim, Bridgeport intends to initiate litigation for copyright  
18 infringement against plaintiffs and others.

19 15. Plaintiffs did not incorporate or otherwise use the composition "Sexy  
20 Ways" in "Blurred Lines." Plaintiffs did not infringe any copyright in "Sexy  
21 Ways."

22 16. Plaintiffs are informed and believe that the Gayes claim that they own  
23 and have standing to pursue claims for infringement of the copyright in the  
24 composition "Got To Give It Up" by Marvin Gaye, and that plaintiffs have infringed  
25 that composition by including elements of it in "Blurred Lines" without the Gaye's  
26 knowledge or consent. Representatives of the Gayes have recently notified  
27 plaintiffs that, if plaintiffs do not pay a monetary settlement of the Gayes' claim, the  
28 Gayes intend to initiate litigation for copyright infringement against plaintiffs and

1 others.

2 17. Plaintiffs did not incorporate or otherwise use the composition “Got To  
3 Give It Up” in “Blurred Lines.” Plaintiffs did not infringe any copyright in “Got To  
4 Give It Up.”

5 18. There is an actual and justiciable controversy between plaintiffs and  
6 Bridgeport in that Bridgeport claims that “Blurred Lines” infringes “Sexy Ways,”  
7 and that the exploitation of “Blurred Lines” violates Bridgeport’s rights as herein  
8 alleged. Conversely, plaintiffs deny Bridgeport’s claims and contend that “Blurred  
9 Lines” does not infringe “Sexy Ways.”

10 19. There also is an actual and justiciable controversy between plaintiffs  
11 and the Gayes in that the Gayes claim that they have an ownership interest in the  
12 composition “Got To Give It Up” and standing to pursue claims of infringement of  
13 that composition; that the Gayes claim that “Blurred Lines” infringes “Got To Give  
14 It Up;” and that the exploitation of “Blurred Lines” violates the Gaye’s alleged  
15 rights, as herein alleged.

16 20. Plaintiffs did not incorporate or otherwise use the composition “Got To  
17 Give It Up” in “Blurred Lines.” Plaintiffs did not infringe any copyright in “Got To  
18 Give It Up.”

19 21. A judicial declaration of the parties’ respective rights and obligations  
20 with respect to “Blurred Lines” is necessary and appropriate.

21 22. Plaintiffs seek a judgment declaring the parties’ respective rights with  
22 regard to “Blurred Lines,” including a declaration that (a) “Blurred Lines” does not  
23 infringe “Sexy Ways” or otherwise violate Bridgeport’s rights; (b) the Gayes do not  
24 have an interest in the copyright to the composition “Got To Give It Up” sufficient  
25 to confer standing on them to pursue claims of infringement of that composition; or  
26 alternatively (c) that “Blurred Lines” does not infringe “Got To Give It Up” or  
27 otherwise violate the Gayes’ rights.

28 ///

1           WHEREFORE, plaintiffs respectfully request judgment against defendant as  
2 follows:

3           1.       A declaration that (a) "Blurred Lines" does not infringe "Sexy Ways"  
4 or otherwise violate Bridgeport's rights; (b) the Gayes do not have an interest in the  
5 copyright to the composition "Got To Give It Up" sufficient to confer standing on  
6 them to pursue claims of infringement of that composition; or alternatively (c) that  
7 "Blurred Lines" does not infringe "Got To Give It Up" or otherwise violate the  
8 Gayes' rights;

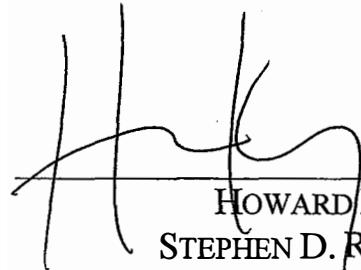
9           2.       For costs and attorney fees incurred herein; and

10          3.       For such other and further relief as the court deems just and proper.

11  
12 DATED: August 15, 2013

KING, HOLMES, PATERNO & BERLINER, LLP

13  
14  
15 By:



HOWARD E. KING

STEPHEN D. ROTHSCHILD

Attorneys for Plaintiffs PHARRELL WILLIAMS,  
ROBIN THICKE and CLIFFORD HARRIS, JR.

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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

NOTICE OF ASSIGNMENT TO UNITED STATES JUDGES

This case has been assigned to District Judge John A. Kronstadt and the assigned Magistrate Judge is Alicia G. Rosenberg.

The case number on all documents filed with the Court should read as follows:

2:13-CV-6004-JAK (AGR~~x~~)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge.

Clerk, U. S. District Court

August 15, 2013  
Date

By MDAVIS  
Deputy Clerk

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NOTICE TO COUNSEL

*A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).*

**Subsequent documents must be filed at the following location:**



Western Division  
312 N. Spring Street, G-8  
Los Angeles, CA 90012

Southern Division  
411 West Fourth St., Ste 1053  
Santa Ana, CA 92701

Eastern Division  
3470 Twelfth Street, Room 134  
Riverside, CA 92501

**Failure to file at the proper location will result in your documents being returned to you.**

Name & Address:

Howard E. King, Esq. -SBN 077012  
Stephen D. Rothschild, Esq. -SBN 132514  
KING, HOLMES, PATERNO & BERLINER, LLP  
1900 Avenue of the Stars, 25th Floor  
Los Angeles, California 90067-4506

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

PHARRELL WILLIAMS, an individual; ROBIN  
THICKE, an individual; and CLIFFORD  
HARRIS, JR., ~~AN INDIVIDUAL~~

PLAINTIFF(S)

v.

BRIDGEPORT MUSIC, INC., a Michigan  
corporation; FRANKIE CHRISTIAN GAYE, an  
individual; MARVIN GAYE III, an individual;  
NONA MARVISA GAYE, an individual;  
and DOES 1 through 10, inclusive,

DEFENDANT(S).

CASE NUMBER

CV 13-06004

JAK (AGK)

SUMMONS

TO: DEFENDANT(S):

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached  complaint  amended complaint  counterclaim  cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Howard E. King, Esq., whose address is 1900 Avenue of the Stars, 25th Floor, Los Angeles, CA 90067. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: AUG 15 2013

By: MARILYN DAVE  
Deputy Clerk



(Seal of the Court)

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].



UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET

<b>I. (a) PLAINTIFFS</b> ( Check box if you are representing yourself <input type="checkbox"/> ) PHARRELL WILLIAMS, an individual; ROBIN THICKE, an individual; and CLIFFORD HARRIS, JR., an individual	<b>DEFENDANTS</b> ( Check box if you are representing yourself <input type="checkbox"/> ) BRIDGEPORT MUSIC, INC., a Michigan corporation; FRANKIE CHRISTIAN GAYE, an individual; MARVIN GARY III, an individual; NONA MARVISA GAYE, an individual
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(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) Howard E. King, Esq. KING, HOLMES, PATERNO & BERLINER, LLP 1900 Avenue of the Stars, 25th Floor Los Angeles, California 90067-4506 (310) 282-8989	(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.)
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<b>II. BASIS OF JURISDICTION</b> (Place an X in one box only.)  <input type="checkbox"/> 1. U.S. Government Plaintiff <input type="checkbox"/> 2. U.S. Government Defendant <input checked="" type="checkbox"/> 3. Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 4. Diversity (Indicate Citizenship of Parties in Item III)	<b>III. CITIZENSHIP OF PRINCIPAL PARTIES-For Diversity Cases Only</b> (Place an X in one box for plaintiff and one for defendant) <table style="width:100%; border-collapse: collapse;"> <tr> <td style="width:30%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> <td style="width:40%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> </tr> <tr> <td>Citizen of This State</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business in this State</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> </tr> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
	PTF	DEF		PTF	DEF																				
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4																				
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Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

**IV. ORIGIN** (Place an X in one box only.)

<input checked="" type="checkbox"/> 1. Original Proceeding	<input type="checkbox"/> 2. Removed from State Court	<input type="checkbox"/> 3. Remanded from Appellate Court	<input type="checkbox"/> 4. Reinstated or Reopened	<input type="checkbox"/> 5. Transferred from Another District (Specify)	<input type="checkbox"/> 6. Multi-District Litigation
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**V. REQUESTED IN COMPLAINT: JURY DEMAND:**  Yes  No (Check "Yes" only if demanded in complaint.)

**CLASS ACTION under F.R.Cv.P. 23:**  Yes  No **MONEY DEMANDED IN COMPLAINT: \$** \_\_\_\_\_

**VI. CAUSE OF ACTION** (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)  
 28 U.S.C. Section 2201, Declaratory Relief re Copyright Claim

**VII. NATURE OF SUIT** (Place an X in one box only.)

OTHER STATUTES	CONTRACT	REAL PROPERTY CONT.	IMMIGRATION	PRISONER PETITIONS	PROPERTY RIGHTS
<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/Etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced & Corrupt Org. <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Admin. Procedures Act/Review of Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Vet.) <input type="checkbox"/> 153 Recovery of Overpayment of Vet. Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise <b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property <b>TORTS</b> <b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions <b>TORTS</b> <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability <b>BANKRUPTCY</b> <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations 445 American with Disabilities-Employment <input type="checkbox"/> 446 American with Disabilities-Other <input type="checkbox"/> 448 Education	<b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee Conditions of Confinement <b>FORFEITURE/PENALTY</b> <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Ret. Inc. Security Act	<input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405 (g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405 (g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609

CV 13-06004

FOR OFFICE USE ONLY: Case Number: \_\_\_\_\_

AFTER COMPLETING PAGE 1 OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED ON PAGE 2.

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET**

**VIII(a). IDENTICAL CASES:** Has this action been previously filed in this court and dismissed, remanded or closed?  NO  YES

If yes, list case number(s): \_\_\_\_\_

**VIII(b). RELATED CASES:** Have any cases been previously filed in this court that are related to the present case?  NO  YES

If yes, list case number(s): \_\_\_\_\_

**Civil cases are deemed related if a previously filed case and the present case:**

- (Check all boxes that apply)
- A. Arise from the same or closely related transactions, happenings, or events; or
  - B. Call for determination of the same or substantially related or similar questions of law and fact; or
  - C. For other reasons would entail substantial duplication of labor if heard by different judges; or
  - D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

**IX. VENUE:** (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named plaintiff resides.

Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

<b>County in this District: *</b>	California County outside of this District; State, if other than California; or Foreign Country
Robin Thicke - Los Angeles County	Pharrell Williams - Florida Clifford Harris, Jr. - Georgia

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named defendant resides.

Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

<b>County in this District: *</b>	California County outside of this District; State, if other than California; or Foreign Country
Frankie Christian Gaye - Los Angeles Marvin Gaye III - Los Angeles Nona Marvisa Gaye - Los Angeles	Bridgeport Music, Inc. - Michigan

(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** claim arose.  
**NOTE: In land condemnation cases, use the location of the tract of land involved.**

<b>County in this District: *</b>	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

\* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved

**X. SIGNATURE OF ATTORNEY (OR SELF-REPRESENTED LITIGANT):** \_\_\_\_\_ DATE: August 15, 2013

Howard E. King

**Notice to Counsel/Parties:** The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet).

**Key to Statistical codes relating to Social Security Cases:**

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405 (g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))