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7 BEP Music, LLC

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11 Attorneys for Defendant Sony Music Entertainment

12  
13 UNITED STATES DISTRICT COURT  
14 CENTRAL DISTRICT OF CALIFORNIA  
15 WESTERN DIVISION

16 ICEBERG RECORDS, A.S., a  
17 Danish Corporation;

18 Plaintiff,

19 vs.

20 WILLIAM ADAMS, JR. p/k/a  
WILL.I.AM, an individual; ALLEN  
21 PINEDA LINDO p/k/a APL.DE.AP;  
JAIME LUIS GOMEZ p/k/a  
22 TABOO, an individual; BEP  
MUSIC, LLC, a Delaware limited  
23 liability company; SONY MUSIC  
ENTERTAINMENT, a Delaware  
24 general partnership; RAMON LUIS  
AYALA-RODRIGUEZ p/k/a  
25 DADDY YANKEE, an individual;  
YONATAN GOLDSTEIN, an  
26 individual; and DOES 1-10,  
inclusive;

27 Defendants.  
28

Case No. 2:24-cv-01893-SB-AS

Before the Hon. Stanley Blumenfeld, Jr.,  
U.S. District Judge

**NOTICE OF MOTION TO DISMISS  
PURSUANT TO RULE 12(b)(6) FILED  
BY DEFENDANTS WILLIAM ADAMS,  
ALLEN PINEDA LINDO, JAMIE LUIS  
GOMEZ, BEP MUSIC, LLC, AND SONY  
MUSIC ENTERTAINMENT**

*[Memorandum of Points & Authorities and  
Proposed Order filed concurrently herewith]*

Hearing

Date: August 2, 2024

Time: 8:30 a.m.

Place: Courtroom 6C

First Street U.S. Courthouse

350 W. First Street

Los Angeles, California 90012

1 TO THE HONORABLE COURT, ALL PARTIES, AND THEIR  
2 ATTORNEYS OF RECORD:

3 PLEASE TAKE NOTICE that on August 2, 2024, at 8:30 a.m. or as soon  
4 thereafter as the matter may be heard before the Hon. Stanley Blumenfeld, Jr.,  
5 in Courtroom 6C of the First Street U.S. Courthouse, located at 350 W. First Street,  
6 Los Angeles, California 90012, Defendants William Adams, Allen Pineda Lindo,  
7 Jamie Luis Gomez, BEP Music, LLC, and Sony Music Entertainment (collectively,  
8 “Defendants”) will and hereby do move to dismiss the Third Cause of Action for  
9 Fraud in the Complaint filed by Plaintiff Iceberg Records, A.S. (“Plaintiff”)  
10 pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure.

11 This motion is made on the grounds that pursuant to Rule 9 of the Federal  
12 Rules of Civil Procedure, the Complaint fails to state with particularity the  
13 circumstances constituting fraud, and therefore fails to state a claim.

14 This motion is and will be based upon this notice of motion, the concurrently  
15 lodged proposed order, the concurrently filed memorandum of points and  
16 authorities, the pleadings and papers on file with the Court, and any argument or  
17 evidence that may be presented to or considered by the Court at or prior to its  
18 ruling.

19 This motion is made following the conference of counsel pursuant to  
20 L.R. 7-3 and ¶ 6a of the Standing Order for Civil Cases Assigned to Judge Stanley  
21 Blumenfeld, Jr., which took place on April 18, 2024 (as to Defendants BEP Music,  
22 Adams, Pineda, and Gomez) and on June 26, 2024 (as to Defendant Sony Music  
23 Entertainment).

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Dated: July 3, 2024

Respectfully submitted,  
GRODSKY & OLECKI LLP  
Allen B. Grodsky  
Courtney L. Puritsky

By:     /s/ Allen B. Grodsky      
Allen B. Grodsky

Defendants William Adams,  
Allen Pineda Lindo, Jamie Luis Gomez, and  
BEP Music, LLC

HERTZ LICHTENSTEIN YOUNG & POLK  
LLP

By:     /s/ Grant Arnow      
Grant Arnow

Counsel for Defendant Sony Music  
Entertainment

**CERTIFICATION**

Pursuant to L.R. 5-4.3.4(a)(2)(i), the filing attorney attests that he has  
obtained concurrence regarding this document’s content and authorization to file  
this document from the indicated signatories to the document.

Dated: July 3, 2024

    /s/ Allen B. Grodsky      
Allen B. Grodsky