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6 Attorneys for Plaintiffs and Counter-
7 Defendants PHARRELL WILLIAMS,
ROBIN THICKE and CLIFFORD
8 HARRIS, JR. and Counter-Defendants
9 MORE WATER FROM NAZARETH
PUBLISHING, INC., STAR TRAK
10 ENTERTAINMENT, INTERSCOPE
RECORDS, UMG RECORDINGS, INC.,
and UNIVERSAL MUSIC
11 DISTRIBUTION

12 UNITED STATES DISTRICT COURT

13 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

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

16 Plaintiffs,

17 vs.

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

22 Defendants.

CASE NO. CV13-06004-JAK (AGR_x)
Hon. John A. Kronstadt, Ctrm 750

NOTICE OF APPEAL

Action Commenced: August 15, 2013
Trial Date: February 24, 2015

23
24 AND RELATED COUNTERCLAIMS.

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1 TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:
2 PLEASE TAKE NOTICE that Plaintiffs and Counter-Defendants Pharrell
3 Williams, Robin Thicke, individually and d/b/a I Like ‘Em Thicke Music, and
4 Clifford Harris, Jr., and Counter-Defendants More Water From Nazareth Publishing,
5 Inc., Star Trak Entertainment, Interscope Records, UMG Recordings, Inc., and
6 Universal Music Distribution, hereby appeal to the United States Court of Appeals
7 for the Ninth Circuit from the final judgment entered on December 2, 2015, as well
8 as any and all interlocutory rulings, decisions, and orders that gave rise to the
9 judgment and are merged therein. A true and correct copy of the final judgment is
10 attached hereto as **Exhibit A**.

11 Pursuant to Ninth Circuit Rule 3-2, a Representation Statement identifying all
12 parties to the action, along with the names, addresses, and telephone number of their
13 respective counsel, is attached hereto as **Exhibit B**.

14
15 DATED: December 7, 2015

KING, HOLMES, PATERNO &
SORIANO, LLP

16
17
18 By: 

19 _____
HOWARD E. KING
20 SETH MILLER

21 Attorneys for Plaintiffs and Counter-Defendants
22 PHARRELL WILLIAMS, et al.
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EXHIBIT A

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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

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

Plaintiffs,

vs.

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,

Defendants.

AND RELATED COUNTERCLAIMS

Case No. CV13-06004-JAK (AGR_x)

JUDGMENT

JS-6

1 This action was tried by a jury, which rendered a verdict. Based on that verdict,
2 IT IS NOW HEREBY ORDERED AND ADJUDGED that:

3 Judgment is entered in favor of Defendants and Counter-Claimants Nona Marvisa
4 Gaye, Frankie Christian Gaye, and Marvin Gaye III (collectively, the “Gaye Parties”) and against Plaintiffs and Counter-Defendants Robin Thicke; Pharrell Williams; Clifford
5 Harris, Jr.; More Water From Nazareth Publishing, Inc.; Interscope Records; Star Trak
6 Entertainment; UMG Recordings, Inc.; and Universal Music Distribution (collectively,
7 “Counter-Defendants”) on the First Claim for Relief, the Gaye Parties’ counterclaim for
8 copyright infringement of the work “Got to Give It Up” by the work “Blurred Lines.”

9 It is further declared that any past and ongoing reproduction, preparation of
10 derivative works, distribution, sale or other transfer of ownership, rental, lease, lending
11 or public performance of “Blurred Lines,” or any authorization of these activities, by any
12 of the Counter-Defendants, individually or in combination, infringes the Gaye Parties’
13 copyright in “Got to Give It Up”; provided, however, that Counter-Defendants or their
14 licensees and other authorized users shall not be liable for damages or subject to suit
15 under 17 U.S.C. § 106 with respect to exploitations of the work “Blurred Lines”
16 occurring after the date of this judgment, so long as the running royalty provided in this
17 judgment is timely paid to the Gaye Parties or their successors in interest.

18 For the First Claim for Relief, Counter-Defendants, jointly and severally, shall pay
19 \$3,188,527.50 in actual damages to the Gaye Parties. In addition, Robin Thicke shall pay
20 \$1,768,191.88, and Pharrell Williams and More Water From Nazareth Publishing, Inc.
21 (collectively, the “Williams Parties”) shall pay \$357,630.96 to the Gaye Parties in
22 separate awards of profits attributable to infringement.

23 Counter-Defendants shall pay prejudgment interest to the Gaye Parties on the actual
24 damages award, and Robin Thicke and the Williams Parties shall pay prejudgment
25 interest to the Gaye Parties on the respective profits awards against each of them, as
26 calculated from the date of the jury’s verdict, March 10, 2015, through the date of entry
27 of this judgment, at the rate of 0.25% per annum simple interest.
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1 The Gaye Parties are awarded their costs incurred and unique as to the First Claim
2 for Relief, in an amount to be determined by the Court, to be paid by Counter-
3 Defendants, who are jointly and severally liable.

4 The Gaye Parties are awarded a running royalty in the amount of fifty percent
5 (50%) of the songwriter and publishing revenue, *i.e.*, net of third party administration
6 costs, received by Counter-Defendants Pharrell Williams, Robin Thicke, and Clifford
7 Harris, Jr., and/or their successors and assigns, from exploitation of the musical
8 composition “Blurred Lines,” occurring after the date of entry of this judgment. Such
9 running royalty shall be paid to the Gaye Parties by Counter-Defendants Pharrell
10 Williams, Robin Thicke, and Clifford Harris, Jr., who are jointly and severally liable.

11 Judgment is entered in favor of Counter-Defendants Robin Thicke, individually and
12 d/b/a I Like ‘Em Thicke Music; Paula Maxine Patton, individually and d/b/a Haddington
13 Music; Geffen Records; Star Trak Entertainment; UMG Recordings, Inc.; and Universal
14 Music Distribution, and against the Gaye Parties on the Second Claim for Relief, the
15 Gaye Parties’ counterclaim for copyright infringement of the work “After the Dance” by
16 the work “Love After War.” The Gaye Parties shall recover nothing for the Second
17 Claim for Relief.

18 Counter-Defendants are awarded their costs incurred and unique as to the Second
19 Claim for Relief, in an amount to be determined by the Court, to be paid by the Gaye
20 Parties, who are jointly and severally liable.

21 The request for declaratory relief by Robin Thicke, Pharrell Williams, and Clifford
22 Harris, Jr. is denied.

23 The Clerk shall enter this Judgment.

24 **IT IS SO ORDERED.**

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26 Dated: December 2, 2015

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28 JOHN A. KRONSTADT
UNITED STATES DISTRICT JUDGE

EXHIBIT B

1 KING, HOLMES, PATERNO & SORIANO, LLP
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6 Attorneys for Plaintiffs/Counter-
7 Defendants/Appellants PHARRELL
WILLIAMS, ROBIN THICKE and
8 CLIFFORD HARRIS, JR. and Counter-
Defendants/Appellants MORE WATER
9 FROM NAZARETH PUBLISHING,
INC., STAR TRAK ENTERTAINMENT,
10 INTERSCOPE RECORDS, UMG
RECORDINGS, INC., and UNIVERSAL
11 MUSIC DISTRIBUTION

12 UNITED STATES DISTRICT COURT

13 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

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

16 Plaintiffs,

17 vs.

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

22 Defendants.

CASE NO. CV13-06004-JAK (AGR_x)
Hon. John A. Kronstadt, Ctrm 750

**REPRESENTATION STATEMENT
OF PLAINTIFFS/COUNTER-
DEFENDANTS/APPELLANTS**

Action Commenced: August 15, 2013
Trial Date: February 24, 2015

23
24 AND RELATED COUNTERCLAIMS.

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1 TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:

2 Ninth Circuit Rule 3-2 states that “a party filing an appeal shall attach to the
3 notice a Representation Statement that identifies all parties to the action along with
4 the names, addresses and telephone numbers of their respective counsel, if any.”

5 Plaintiffs/Counter-Defendants/Appellants Pharrell Williams, Robin Thicke,
6 individually and d/b/a I Like ‘Em Thicke Music, and Clifford Harris, Jr., and
7 Counter-Defendant/Appellant More Water From Nazareth Publishing, Inc. are
8 represented by the following counsel:

9 KING, HOLMES, PATERNO & SORIANO, LLP
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19 New York, New York 10010
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20 Facsimile: (212) 849-7100

21 Counter-Defendants/Appellants Interscope Records, Star Trak Entertainment,
22 UMG Recordings, Inc., and Universal Music Distribution are represented by the
23 following counsel:

24 KING, HOLMES, PATERNO & SORIANO, LLP
Howard E. King, Esq.
25 Seth Miller, Esq.
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8 Defendants/Counterclaimants/Appellees Nona Marvisa Gaye and Frankie
9 Christian Gaye are represented by the following counsel:

10 KING & BALLOW
11 Richard S. Busch, Esq.
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17 KING & BALLOW
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Facsimile: (415) 471-3400

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1 Defendant/Counterclaimant/Appellee Marvin Gaye III is represented by the
2 following counsel:

3 LAW OFFICES OF PAUL N. PHILIPS, APLC
4 Paul N. Philips, Esq.
5 9255 West Sunset Boulevard, Suite 920
6 West Hollywood, California 90069
7 Telephone: (323) 813-1126
8 Facsimile: (310) 854-6902

9 DATED: December 7, 2015 KING, HOLMES, PATERNO &
10 SORIANO, LLP

11 By: 
12 _____
13 HOWARD E. KING
14 SETH MILLER
15 Attorneys for Plaintiffs/Counter-Defendants/
16 Appellants PHARRELL WILLIAMS, et al.

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CERTIFICATE OF SERVICE

I hereby certify that on December 7, 2015, I electronically filed the foregoing **NOTICE OF APPEAL** with the Clerk of the Court by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.



Joey S. Gossett