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Attorneys for Non-Party Movants
DANIEL REED and AMOS PICTURES

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES – WESTERN DISTRICT

WADE ROBSON, an individual,

Plaintiff,

vs.

MJJ PRODUCTIONS, INC., a California
corporation; MJJ VENTURES, INC., a
California corporation; and DOES 4-50,
inclusive,

Defendants.

Case No. BC 508502

[Related to Case No. BP117321 and Case No.
BC545264]

Assigned to Hon. Mark A. Young, Dept. M

**DECLARATION OF DANIEL REED IN
SUPPORT OF NON-PARTY MOVANTS
MOTION TO QUASH TWO SUBPOENAS
DUCES TECUM**

Date: April 9, 2021
Time: 8:30 a.m.
Location: M
Judge: Mark A. Young

DECLARATION OF DANIEL REED

I, Daniel Reed, declare as follows:

1. I am a documentary filmmaker and founder and director of Amos Pictures Ltd (“Amos”).
2. I am a citizen and resident of the United Kingdom.
3. Amos is a UK production company located exclusively in the UK. Amos never has had offices or any other facilities in California or anywhere else in the United States.

1 4. On or about August 25, 2020, I requested the Court's permission to film and record the
2 proceedings in this case, following the procedure set forth in Rule 1.150(e) of the California Rules of
3 Court. The Court granted my request by order on the same date. See Exhibit A attached to this
4 Declaration.

5 5. The Court also granted my request to film and record proceedings in the related case
6 brought by plaintiff James Safechuck against defendants MJJ Productions, Inc., et al. See Exhibit B
7 attached to this Declaration.
8

9 6. By the time this motion is heard, I will have spent only 29 days in Los Angeles County
10 this year, staying only in various Airbnb rental units, for the sole purpose of filming the proceedings of
11 these cases with the Court's permission. On October 18, I will fly back to my permanent residence in the
12 UK, and I have no plans to visit California again until March of 2021.
13

14 7. My 30-year career as a documentary filmmaker has been spent covering mostly war,
15 terrorism and crime. I have received 10 BAFTA and 5 Emmy nominations, including three News and
16 Documentary Emmy nominations. I have won 6 BAFTAs, including in the Current Affairs category, and
17 twice been nominated for the Primetime Emmy for nonfiction directing. In 2019, I won the Primetime
18 Emmy Award for Outstanding Documentary for "Leaving Neverland." In 2020, I was nominated for a
19 Peabody Award for "Leaving Neverland." Previously, in 1999, I won a Peabody Award for my 70-
20 minute documentary "The Valley," broadcast on CNN and Channel 4, filmed at great personal risk on
21 the front lines of the Kosovo war.
22

23 8. I am currently in production at Amos, a company that I founded in 2013, with a large
24 slate of documentary content for HBO, the BBC and Channel 4, on topics which include the threat of
25 antibiotic resistance, the history of viruses and vaccines, the history of monetization of data in Silicon
26 Valley, and the defamation lawsuits brought by Sandy Hook parents against Alex Jones.
27
28

1 9. I am currently filming for the News and Current Affairs Department of Channel 4
2 Television Corporation, a leading national public service broadcaster in the UK, with the aim of
3 producing a follow-up film to my documentary, “Leaving Neverland.”

4 10. Unlike “Leaving Neverland,” which concerns sexual crimes against children allegedly
5 perpetrated in secret decades ago, the follow-up documentary for which I am currently filming in these
6 cases is about current events taking place partly in public view and will be an unfolding narrative with
7 multiple points of view. There are multiple parties involved in the judicial process – for example,
8 plaintiffs, defendants, and the Court - and I intend to chronicle all of what these parties do and say
9 throughout the legal proceedings.
10

11 11. I wrote to Counsel for MJJ Ventures Inc. and MJJ Productions Inc. (together, “MJJ” or
12 “Defendants”), Mr. Howard Weitzman (“Weitzman” or “Defense Counsel”), in June 2020 asking
13 Weitzman to participate in the follow-up documentary. Weitzman invited me and my Assistant
14 Producer, Marguerite Gaudin, to meet at Weitzman’s offices in Santa Monica. At that meeting on June
15 29, 2020, Weitzman gave me every reason to be optimistic that interviews and behind-the-scenes
16 filming with Weitzman might be possible. I followed up with a number of emails suggesting a further
17 meeting. Weitzman subsequently refused to participate in the follow-up film. See Exhibit C and Exhibit
18 D to this Declaration.
19
20

21 12. I also wrote to John Branca, CEO of MJJ Ventures Inc., CEO of MJJ Productions Inc.,
22 and Co-Executor of the Michael Jackson Estate, requesting his participation in the follow-up
23 documentary but was informed by Weitzman at the June 29 meeting that Mr. Branca would not
24 participate. See Exhibit E to this Declaration.
25

26 13. Further I wrote to counsel for each of the defense parties involved in the last hearing and
27 verified receipt of these messages but received no reply. See Exhibits F, G and H to this Declaration.
28

1 14. I am not affiliated with any of the parties to this action. While plaintiffs in these cases are
2 the subjects of “Leaving Neverland,” I have no personal interest in these cases or their outcomes.

3 15. To the best of my knowledge, neither Jackson’s family nor any representative of the
4 Estate were present when the crimes alleged in “Leaving Neverland” allegedly took place.

5 16. On or about September 21, 2020, Defendants served subpoenas on me and Amos to
6 personally appear for deposition and produce documents related to “Leaving Neverland” and to the
7 follow-up film currently in production. See Exhibits I and J to this Declaration.

8 17. Defendants have filed a “brief” with this Court that includes various false accusations,
9 many of which are about me and my work on “Leaving Neverland.” The defendants argue that I am not
10 a journalist, and indeed, that I am not even a documentary filmmaker.
11

12 18. Defendants state that I never informed Jackson’s children about the release of “Leaving
13 Neverland.”
14

15 19. I sent a letter to Paris Jackson’s agent by email on January 10th, 2020, prior to the
16 premiere of “Leaving Neverland” at Sundance, to notify the family of the release of “Leaving
17 Neverland.” See Exhibit K to this Declaration.
18

19 20. Defendants state that I have compared Jackson to Adolf Hitler and Ted Bundy (MJJ Brief
20 P5 L2) when in fact this is an out of context quote from an interview in Jezebel magazine. The entire
21 quote is as follows: “There were lots of people who probably thought Ted Bundy was a nice guy or
22 Hitler was a good watercolorist. Michael Jackson was a nice guy and he was talented and he was
23 magnificent and he was charismatic and he was warm and generous and supportive and he was a
24 pedophile.” – Rich Juzwiak, *Why Leaving Neverland's Director Believes His Subjects' Claims of Being*
25 *Molested by Michael Jackson*, JEZEBEL, February 28, 2019.
26
27
28

1 21. Defendants have characterized my representation of former Jackson attorney, Mark
2 Geragos as a “twisting [of] words”; however, my presentation of Geragos’ threat is justified by the
3 wider context of his statements and is consistent with how the press understood it at the time. See
4 Exhibits L and M to this Declaration.

5 22. Defendants have stated that I “explicitly refused to remove a private figure from
6 [“Leaving Neverland”] when that person objected that he had never been told he would be in the film
7 and that the film would falsely allege that the private figure, was molested by Jackson.”

8 23. In “Leaving Neverland,” I included the following lines of text on-screen at the conclusion
9 of part 1 of the documentary: “Macaulay Culkin and Brett Barnes categorically deny any sexual contact
10 with Michael Jackson.” This was deliberately done in order to dispel any ambiguity in the audience’s
11 mind.
12

13 24. I have stated on the record that I respect the fact that Macaulay Culkin and Brett Barnes
14 consistently and repeatedly denied any sexual contact with Jackson. See Exhibit N to this Declaration.
15

16 25. Defendants cite one review of “Leaving Neverland” to support their view that it was a
17 one-sided film. This is unrepresentative of the general character of reviews of the film. The press
18 overwhelmingly found “Leaving Neverland” to be a credible, legitimate and timely work of journalism.
19 Recounted in the accompanying Declaration of Louisa Compton, Head of News and Current Affairs for
20 Channel 4 Television, are some of the countless accolades the film has received from the worldwide
21 news media.
22

23 26. Below are further representative examples of reviews where, even with a few critiques,
24 none find the film wanting in terms of impartiality:
25
26
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1 “‘Leaving Neverland’ is heartbreaking and hard to watch for many reasons, among them that
2 Jackson is such a part of our collective history. Although there are pacing issues here and the
3 filmmaker could have used a few more sources to widen the story, it’s a compelling look at
4 childhood trauma, fame and the mechanics of pedophilia.”

5 -- Lorraine Ali, *Review: HBO’s ‘Leaving Neverland’ is a disturbing portrait of Michael Jackson*
6 *and childhood trauma*, LOS ANGELES TIMES, March 1, 2019
7

8
9 “Leaving Neverland” makes excellent use of scrapbooks, personal photographs, videos, recorded
10 phone messages, faxes, letters and other assorted ephemera kept by the men and their families —
11 particularly their moms, who, by the film’s end must account for the blind trust that made the
12 abuse possible.
13

14 -- Hank Stuever, *A devastating and credible ‘Leaving Neverland’ will turn you off Michael*
15 *Jackson for good*, THE WASHINGTON POST, February 28, 2019
16

17
18 “The filmmaker, Dan Reed, forces us to confront the idea that the greatest pop genius since the
19 Beatles was, beneath his talent, a monster. “Leaving Neverland” is a kind of true-life horror
20 movie. Some will walk out of it shaken, others, on some level, liberated by the extent of its
21 claims.”
22

23 -- Owen Gleiberman, *Film Review: ‘Leaving Neverland’*, VARIETY, January 25, 20
24

25 27. Defendants state that “Leaving Neverland” “contains many egregious factual errors that
26 are easily proven false.”
27
28

1 28. Not one factual error in “Leaving Neverland” has been brought to my attention either
2 directly or in the press coverage.

3 29. Defendants state that Jackson’s fans on Twitter have claimed to have found “anomalies”
4 in “Leaving Neverland.” My team and I have examined all these so-called anomalies and have found
5 each one to be baseless.

6 30. “Leaving Neverland” dealt with Plaintiffs Wade Robson and James Safechuck’s
7 relationships with Michael Jackson, the fallout from their alleged abuse, and their families’ role in these
8 events.
9

10 31. In the interviews I conducted for “Leaving Neverland,” I deliberately steered away from
11 discussion of the related court cases in anything except the most general terms. However, in the film
12 itself, contrary to Defendants’ assertions, the case brought by Wade Robson and James Safechuck
13 against MJJ Productions, Inc., et al., are mentioned.
14

15 32. Defendants have told the Court that they believe I am paying the plaintiffs to appear in
16 the follow-up documentary. This is absolutely false.
17

18
19 I declare under penalty of perjury under the laws of the State of California and the laws of the United
20 Kingdom that the foregoing is true and correct.
21

22 Executed October 13, 2020 in Los Angeles, California.
23

24 

25 _____
26 Daniel Reed
27
28

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Assigned to Hon. Mark A. Young, Dept. M

**DECLARATION OF LOUISA COMPTON IN
SUPPORT OF NON-PARTY MOVANTS
DANIEL REED AND AMOS PICTURES’
MOTION TO QUASH SUBPOENAS DUCES
TECUM**

Date: April 9, 2021
Time: 8:30 a.m.
Location: M
Judge: Mark A. Young

DECLARATION OF LOUISA COMPTON

I, Louisa Compton, declare as follows:

1. I am the Head of News and Current Affairs for Channel 4 Television Corporation in the UK (“Channel 4”). Along with the BBC, Channel 4 is one of the two public service broadcasters owned by the UK Government.

1 2. Unlike other broadcasters, Channel 4 is not permitted to produce its own programmes in-
2 house. One of its core purposes is to support the independent production sector. Accordingly, it does not
3 have an in-house production facility, such that our programmes are commissioned from, and produced
4 by, a range of independent production companies, including the movant in this case, Amos Pictures.
5 Channel 4 has a statutory obligation to provide current affairs broadcasting and to support and stimulate
6 well-informed debate on a wide range of issues, including access to information and views from around
7 the world, and including challenges to established views. The independent production companies that
8 make Channel 4's programmes are obliged to comply with the law and with the Ofcom Broadcasting
9 Code, which imposes rigorous standards in such areas as fairness and privacy.
10

11 3. It was the News and Current Affairs Department of Channel 4 that (together with HBO)
12 commissioned movant and documentary filmmaker Dan Reed ("Reed") and his production company,
13 Amos Pictures, to make the documentary film, "Leaving Neverland." Channel 4 also has engaged Reed
14 and Amos Pictures to develop a follow-up that Reed is filming now on a related subject, namely, the
15 legal allegations of unlawful and improper sexual activities on the part of Michael Jackson in relation to
16 the plaintiffs in this litigation. Throughout the making of "Leaving Neverland," as well as the current
17 follow-up documentary about this case, Reed and Amos have been working for the News and Current
18 Affairs division of Channel 4, which has been funding their journalistic efforts.
19
20

21 4. "Leaving Neverland" also was commissioned in the US by HBO. The two-part HBO
22 version of the film was the most-watched documentary in HBO's history. For their making of this film,
23 Reed and Amos won the 2019 Primetime Emmy Award for Outstanding Documentary. In 2020,
24 Channel 4, Reed, and Amos, in connection with the UK broadcast of our version of "Leaving
25 Neverland," won the equivalent UK award, namely, the British Academy of Film and Television Arts
26 (BAFTA) award for the best Factual Series of the year.
27
28

1 5. We at the News and Current Affairs Department of Channel 4 are tremendously proud of
2 “Leaving Neverland,” which has been recognized by the television industry in the United States and the
3 United Kingdom as not only the best documentary of 2019-20, but also one of the most newsworthy and
4 compelling documentaries ever filmed. As stated in Variety, this is “the rare documentary that’s had a
5 seismic impact in the real world.” (See citation below.) The following are just a few of the countless
6 accolades the film has received from the worldwide news media:
7

8
9 “Riveting and sharply convincing”

10 -- Hank Stuever, *A devastating and credible ‘Leaving Neverland’ will turn you off Michael*
11 *Jackson for good*, THE WASHINGTON POST, February 28, 2019
12

13
14 “There’s no turning your head the other way. It’s unbearable to watch. But you should.”

15 -- Chris Richards, *Every Michael Jackson song sounds different today*, THE WASHINGTON
16 POST, March 4, 2019
17

18
19 “Celebrity supersedes criminality. How can you see clearly when you’re looking into the sun?
20 How can an icon be a con?” “Even with this shocking documentary, the Michael Jackson estate
21 is still demonizing the victims.”

22 -- Maureen Dowd, *The King of Pop - and Perversion*, THE NEW YORK TIMES, February 16,
23 2019
24

25
26 “Overwhelmingly powerful and convincing.”

27 -- Owen Gleiberman, *Film Review: ‘Leaving Neverland’*, VARIETY, January 25, 2019
28

1
2 “The rare documentary that’s had a seismic impact in the real world.”

3 -- Peter Debruge, Owen Gleiberman, *The 15 Best Films of 2019 (So Far)*, VARIETY, June 15,
4 2019

5
6
7 “Leaving Neverland is what finally got many people to admit to themselves what they already
8 believed. The testimony of the two men is so intimate, so drenched with the sorrow of ruined
9 childhoods, that it cannot be denied.”

10 -- Caitlin Flanagan, *The Art of a Monster*, THE ATLANTIC, March 20, 2019

11
12
13 “Tough show to watch — but it should be seen” “The #MeToo movement has taught us that
14 alleged victims must be allowed to tell their stories. Leaving Neverland tells two of them —
15 powerfully and unforgettably.”

16 -- David Bianculli, *'Leaving Neverland' Is Hard To Watch — But Important To See*, NPR, March
17 1, 2019

18
19
20 “Leaving Neverland will likely register as one of the central documents of this era, because at its
21 heart it forces us to reckon with the dark thrall of influence. How it infects. How it blinds. How it
22 bleeds. Maybe more than anything, it requires us to ask ourselves: Who should we trust?”

23 -- Jason Parham, *Leaving Neverland Forces Us to Confront Our Feral Fandom*, WIRED, March
24 4, 2019

1 “Tough to watch, it's also an eye-opening look at the lasting effects of abuse, and the way the
2 media handles allegations against powerful men.”

3 -- Kelly Lawler, *The 50 best TV shows to watch on HBO Max right now: From 'Friends,' to*
4 *'Doctor Who,' to 'Looney Tunes'*, USA TODAY, October 2, 2020

5
6
7 “Hard to watch, tougher to ignore, impossible to forget”

8 -- David Fear, *10 Best Movies of Sundance 2019*, ROLLING STONE, February 3, 2019

9
10 “An appalling story of predatory child sexual abuse, told in such painful detail and at such heroic
11 length that it’s impossible to dismiss. But what the series also makes clear, beyond almost
12 everything else, is the power of wilful blindness.”

13
14 -- John Anderson, *‘Leaving Neverland’ Review: The Dark Side of the Moonwalks*, THE WALL
15 STREET JOURNAL, February 28, 2019

16
17 “Gruelling and devastating film that asks viewers to reconfigure how they think about both
18 Jackson and potential victims of rape” “Leaving Neverland is a gruesome and fascinating
19 document. Independent of how it might lead us to reassess our relationship with Jackson’s music,
20 it feels important that these men are able to tell their stories, however many years later, in
21 whatever way they choose.”

22
23 -- Amanda Petrusich, *A Day of Reckoning for Michael Jackson with “Leaving Neverland”*, THE
24 NEW YORKER, March 1, 2019

1 “Exhaustive, exhausting, enraging...consistently gripping.”

2 -- Ty Burr, *First report from Sundance: Michael Jackson, Mindy Kaling, and more*, THE
3 BOSTON GLOBE, January 27, 2019

4
5 “A work of extraordinary restraint and moral urgency.”

6
7 -- Alissa Wilkinson, *Leaving Neverland makes a devastating case against Michael Jackson*,
8 VOX, February 27, 2019

9
10 6. I understand that in an apparent effort to discredit Reed and his production company, and
11 to persuade the Court that Reed is not a legitimate journalist or even a documentary filmmaker, the
12 Michael Jackson / MJJ companies have criticized him for not interviewing representatives of these
13 companies or members of Michael Jackson’s family in the “Leaving Neverland” film. As the
14 Defendants’ attorneys know from correspondence prior to the UK broadcast, at the News and Current
15 Affairs department of Channel 4 we took the position that the significant allegations in the programme
16 that Michael Jackson was a perpetrator of child sexual abuse were responded to by the inclusion of Mr.
17 Jackson’s own denials. The documentary deals with the criminal trials and civil court cases and any
18 involvement our principal interviewees had in those. It is not unusual for victims of child sex abuse to
19 only feel able to disclose what happened to them in later life.

20
21
22 7. The Channel 4 Factual Guidelines explicitly state that they are to be read in conjunction
23 with the Ofcom Broadcasting Code. The Code stipulates that “If a programme alleges wrongdoing or
24 incompetence or makes other significant allegations, those concerned should normally be given an
25 appropriate and timely opportunity to respond.” On this occasion, the person against whom the
26
27
28

1 significant allegations were made was deceased. It is therefore appropriate that his denials during life are
2 included in the programme.

3 8. There was no valid reason to interview representatives of Michael Jackson's company or
4 his family members, none of whom were present during any of the alleged instances of sexual abuse.
5 The film reports on the denials of Jackson and his family members in opposition to the allegations, but
6 does not give the Michael Jackson companies a platform for their opinions about his alleged criminal
7 activities.
8

9 9. The UK broadcasting regulator Ofcom rejected all complaints it received about the
10 programme. A spokesman for Ofcom was quoted in the press as saying:

11 "We understand that this two-part documentary gave rise to strong
12 opinions from viewers."

13 "In our view, the allegations were very clearly presented as personal
14 testimonies and it was made clear that the Jackson family rejects them."

15 10. By contrast, because the follow-up film about this case involves a legal battle, we
16 understand that Reed made every effort to persuade the MJJ company lawyers to appear on camera to
17 participate in this new documentary film and tell their side of the story. They refused.
18

19 11. Contrary to the MJJ allegations, Reed is one the most internationally renowned and
20 highly-regarded documentary-makers in the industry. Over a stellar 30-year career covering mostly war,
21 terrorism and crime, he has garnered 10 BAFTA and five Emmy nominations, including three News and
22 Documentary Emmy nominations. He has won six BAFTA awards - including the Current Affairs
23 category – and has twice been nominated for the Primetime Emmy for nonfiction directing. As
24 mentioned above, in 2019 he won the Primetime Emmy Award for Outstanding Documentary, for
25 "Leaving Neverland." He won a Peabody Award in 1999 for a 70-minute documentary, broadcast on
26 CNN and Channel 4, filmed at great personal risk on the front lines of the Kosovo war.
27
28

12. Understandably, the MJJ companies are not happy with “Leaving Neverland” or the making of the follow-up documentary. It is easy to see why they do not want the subject matter of these films to be reported to the public. However, as much as they may dislike the messages that are being conveyed by these documentaries, we strenuously oppose their efforts to “shoot the messenger.” In particular, we at Channel 4 oppose their effort to use subpoenas to try to force Reed and his company to turn over all of their unpublished materials and drag this journalist into depositions. In the UK, as in the United States, the courts are very reluctant to order journalists to hand over unbroadcast and other journalistic material, given the strong legal protections that exist to protect freedom of expression. The motives of the MJJ companies are further revealed by their attempt to ban Reed from filming in the courtroom and thereby prohibit him from getting footage to report on the proceedings. We oppose these efforts to suppress journalism by preventing Reed from further informing the public about these matters of vital public importance.

I declare under penalty of perjury under the laws of the State of California and the laws of the United Kingdom that the foregoing is true and correct.

Executed October 13, 2020 in London, England.



Louisa Compton

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Attorneys for Non-Party Movants
DANIEL REED and AMOS PICTURES

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Plaintiff,

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Assigned to Hon. Mark A. Young, Dept. M

**DECLARATION OF JEFFERY HOLMES IN
SUPPORT OF NON-PARTY MOVANTS
DANIEL REED AND AMOS PICTURES’
MOTION TO QUASH SUBPOENAS DUCES
TECUM**

Date: April 9, 2021
Time: 8:30 a.m.
Location: M
Judge: Mark A. Young

DECLARATION OF JEFFERY HOLMES, ESQ.

I, Jeffery Holmes, declare as follows:

1. I am an attorney authorized to practice law in the State of California. I am a member of the law firm SmithDehn LLP, attorneys for non-party journalists Daniel Reed (“Reed”) and Amos Pictures (“Amos”). I respectfully submit this declaration in further support of this motion by Mr. Reed

1 and Amos to quash two subpoenas duces tecum (the “Subpoenas”) dated September 21, 2020 and issued
2 on behalf of MJJ Productions Inc./ MJJ Ventures Inc. (“MJJ” or “MJJ Companies”). See Reed Decl. at
3 Exhs. I and J.

4 2. I am informed of and believe the following: (a) on September 30, 2020, Russell Smith, a
5 partner at SmithDehn LLP, contacted MJJ counsel and began the process of “meet-and-confer;” (b) Mr.
6 Smith asked if MJJ counsel would withdraw the Subpoenas and return to their stated discovery plan,
7 filed with the Court, to rely upon international discovery processes in relation to Mr. Reed and Amos;
8 and (c) Mr. Smith advised MJJ counsel that Mr. Reed and/or Amos intended to file a motion to quash
9 the Subpoenas if the matter could not be resolved.
10

11 3. On October 5, 2020, at 2:30 p.m., attorney of record for MJJ (Suann C. MacIsaac), Mr.
12 Smith, and I had a telephonic meet-and-confer session at our request.
13

14 4. During the October 5th meet-and-confer, Ms. MacIsaac wanted to know whether Mr.
15 Reed is a "resident" of Los Angeles based on his stays or offices. Mr. Smith said that Mr. Reed has not
16 been a "resident" of Los Angeles, since short stays in short-term rental accommodations do not qualify.
17 He also explained that Mr. Reed’s company, Amos, a UK corporation, had no offices or other facilities
18 in the United States. He further explained that Mr. Reed is a foreign national residing in the United
19 Kingdom and that Mr. Smith believes that the correct avenue for discovery was through the Hague
20 Convention procedures. Ms. MacIsaac indicated that they were proceeding on a parallel track under the
21 Hague Convention procedures to try to obtain the requested outtakes and other documents and
22 information in the UK.
23
24

25 5. Ms. MacIsaac asked if Mr. Reed and Amos were willing to comply with any aspects of
26 the Subpoenas. In response, we said we would need to know specifically what information the MJJ
27 Companies are seeking, and that until then our clients would maintain their right to move to quash the
28

1 Subpoenas. Ms. MacIsaac indicated that she might send us a list of particular outtake subjects or other
2 information they want, which relate to various alleged discrepancies in the documentary film “Leaving
3 Neverland,” allegedly discovered by Michael Jackson fans. Such a list was never provided.

4 6. On Friday afternoon, October 9, 2020, counsel for MJJ filed a lengthy “brief” with the
5 Court, seeking to overturn the Court’s order allowing Mr. Reed and Amos to film court proceedings. I
6 am informed and believe that the MJJ Companies did not provide any notice of this to Mr. Reed and/or
7 Amos.
8

9 7. In their brief, the MJJ Companies make arguments claiming that Mr. Reed and Amos are
10 not journalists and are not even documentary filmmakers. They also argue against our assertions of lack
11 of jurisdiction in relation to the Subpoenas, as we discussed in our meet-and-confer session. In my
12 opinion, the MJJ Companies effectively filed an opposition to our motion to quash, even before we filed
13 the motion.
14

15 8. Mr. Smith and I had another meet-and-confer session with Ms. MacIsaac on October 13.

16 9. During that second meet-and-confer session, Ms. MacIsaac continued to decline to
17 withdraw the Subpoenas. However, she said that MJJ Companies offered to (a) limit the subpoenas to
18 all of the unpublished footage of the plaintiffs; and (b) depose Mr. Reed and Amos only about that
19 footage.
20

21 I declare under penalty of perjury under the laws of the State of California that the foregoing is
22 true and correct.

23 Executed October 13, 2020 in Los Angeles, California.
24

25 By: /s/ Jeffery Holmes
26 Jeffery Holmes, Esq.
27
28

EXHIBIT A

MEDIA AGENCY (name): AMOS Pictures CHANNEL/FREQUENCY NO.: Channel 4 UK, US broadcaster TBC PERSON SUBMITTING REQUEST (name): Dan Reed ADDRESS: 9 Perseverance Works, Kingsland Road, London, E2 8DD TELEPHONE NO.: 786 223 9985		FOR COURT USE ONLY FILED Superior Court of California County of Los Angeles SEP 22 2020 Sherri R. Carter, Executive Officer/Clerk By <u>[Signature]</u> Deputy K. Metover CASE NUMBER: BC508502	
Insert name of court and name of judicial district and branch court, if any: County of Los Angeles, Santa Monica Courthouse			
TITLE OF CASE: WADE ROBSON VS DOE 1, ET AL			
NAME OF JUDGE: Honorable Mark A. Young			
ORDER ON MEDIA REQUEST TO PERMIT COVERAGE			

AGENCY MAKING REQUEST (name):

1. a. ☐ No hearing was held.
 b. ☐ Date of hearing: _____ Time: _____ Dept./Div.: _____ Room: _____
2. The court considered all the relevant factors listed in subdivision (e)(3) of California Rules of Court, rule 1.150 (see reverse).
3. ☐ **THE COURT FINDS** (findings or a statement of decision are optional): ☐ Attached ☐ As follows:

THE COURT ORDERS

4. The request to photograph, record, or broadcast is

a. ☐ denied.b. ☒ **granted** subject to the conditions in rule 1.150, California Rules of Court, **AND** the following:

- (1) ☐ The local rules of this court regulating media activity outside the courtroom (copy attached).
 (2) ☐ The order of the presiding or supervising judge regulating media activity outside the courtroom (copy attached).
 (3) ☐ Payment to the clerk of increased court-incurred costs of (specify): \$ _____ to be determined.
 (4) ☒ The media agency shall demonstrate to the court that the proposed personnel and equipment comply with California Rules of Court, rule 1.150, and any local rule or order.
 (5) ☒ Personnel and equipment shall be placed ☒ as directed ☐ as indicated in the attachment ☐ as follows (specify):

- (6) (i) ☐ The attached statement of agreed pooling arrangements is approved.
 (ii) ☐ A statement of agreed pooling arrangements satisfactory to the court shall be filed before coverage begins.

(7) ☒ This order

- (i) ☐ shall not apply to allow coverage of proceedings that are continued.
 (ii) ☒ shall apply to allow coverage of proceedings that are continued.

(8) ☒ Other (specify): *This order will remain in effect for future hearing and trial, unless otherwise ordered by the court.*

5. Coverage granted in item 4b is permitted in the following proceedings:

- a. ☒ All proceedings, except those prohibited by California Rules of Court, rule 1.150, and those proceedings prohibited by further court order.
 b. ☐ Only the following proceedings (specify type or date or both):

6. ☐ The order made on (date): _____ is ☐ terminated ☐ modified as follows (specify):

7. ☐ Number of pages attached:Date: *9/22/20*

(See reverse for additional information)

JUDGE

CASE NAME: WADE ROBSON VS DOE 1, ET AL	CASE NUMBER: BC508502
--	-----------------------

FACTORS CONSIDERED BY THE JUDGE IN MAKING THIS ORDER (Rule 1.150)

- | | |
|--|--|
| 1. Importance of maintaining public trust and confidence in the judicial system | 11. Effect of coverage on the willingness of witnesses to cooperate, including the risk that coverage will engender threats to the health or safety of any witness |
| 2. Importance of promoting public access to the judicial system | 12. Effect on excluded witnesses who would have access to the televised testimony of prior witnesses |
| 3. Parties' support of or opposition to the request | 13. Scope of the coverage and whether partial coverage might unfairly influence or distract the jury |
| 4. Nature of the case | 14. Difficulty of jury selection if a mistrial is declared |
| 5. Privacy rights of all participants in the proceeding, including witnesses, jurors, and victims | 15. Security and dignity of the court |
| 6. Effect on any minor who is a party, prospective witness, victim, or other participant in the proceeding | 16. Undue administrative or financial burden to the court or participants |
| 7. Effect on the parties' ability to select a fair and unbiased jury | 17. Interference with neighboring courtrooms |
| 8. Effect on any ongoing law enforcement activity in the case | 18. Maintaining orderly conduct of the proceeding |
| 9. Effect on any unresolved identification issues | 19. Any other factor the judge deems relevant |
| 10. Effect on any subsequent proceedings in the case | |

PROHIBITED COVERAGE (Rule 1.150)

This order does not permit photographing, recording, or broadcasting of the following in the court:

- | | |
|--|---|
| 1. The jury or the spectators | 5. A conference between counsel and the judge at the bench ("sidebars") |
| 2. Jury selection | 6. A proceeding closed to the public |
| 3. A conference between an attorney and a client, witness, or aide | 7. A proceeding held in chambers |
| 4. A conference between attorneys | |

MEDIA PERSONNEL AND EQUIPMENT (Rule 1.150)

NOTE: These requirements apply unless the judge orders otherwise. Refer to the order for additional requirements.

- | | |
|--|--|
| 1. No more than one television camera | 6. No distracting sounds or lights |
| 2. No more than one still photographer | 7. No visible signal light or device that shows when equipment is operating |
| 3. No more than one microphone operator and no obtrusive microphones or wiring | 8. No disruption of proceedings, nor public expense, to install, operate, or remove modifications to existing sound and lighting systems |
| 4. No operator entry or exit or other distraction when the court is in session | 9. No media agency insignia or marking on equipment or clothing |
| 5. No moving equipment when the court is in session | |

SANCTIONS FOR VIOLATING THIS ORDER (Rule 1.150)

Any violation of this order or rule 1.150 is an unlawful interference with the proceedings of the court. The violation may result in an order terminating media coverage, a citation for contempt of court, or an order imposing monetary or other sanctions.

EXHIBIT B

MEDIA AGENCY (name): AMOS Pictures CHANNEL/FREQUENCY NO.: Channel 4, UK, US broadcaster TBC PERSON SUBMITTING REQUEST (name): Dan Reed ADDRESS: 9 Perseverance Works, Kingsland Road, London, E2 8DD TELEPHONE NO.: 786 223 9985	FOR COURT USE ONLY
Insert name of court and name of judicial district and branch court, if any: Superior Court of California, County of Los Angeles West District, Santa Monica Courthouse, Department M	
TITLE OF CASE: JAMES SAFECHUCK VS DOE 1 ET AL	
NAME OF JUDGE: Honorable Mark A. Young	
MEDIA REQUEST TO PHOTOGRAPH, RECORD, OR BROADCAST	CASE NUMBER: BC545264

1. PORTION OF THE PROCEEDINGS TO BE COVERED (e.g., particular witnesses at trial, the sentencing hearing, etc.):
Hearing on Demurrer
2. DATE OF PROPOSED COVERAGE (specify): **10/16/2020**
(File this form at least five court days before the proposed coverage date. If not feasible, explain good cause for noncompliance):
3. TYPE OF COVERAGE

a. <input type="checkbox"/> TV camera and recorder	d. <input checked="" type="checkbox"/> Audio
b. <input type="checkbox"/> Still camera	e. <input type="checkbox"/> Other (specify):
c. <input checked="" type="checkbox"/> Motion picture camera	
4. ☐ SPECIAL REQUESTS OR ANTICIPATED PROBLEMS (specify):
5. ☒ INCREASED COSTS. This agency acknowledges that it will be responsible for increased court-incurred costs, if any, resulting from this media coverage (estimate): \$
☒ Amount unknown
6. PROPOSED ORDER. A completed, proposed order on Judicial Council form MC- 510 is attached (required by Cal. Rules of Court, rule 1.150).

CERTIFICATION

I certify that if the court permits media coverage in this case, all participating personnel in this media agency will be informed of and will abide by the provisions of California Rules of Court, rule 1.150, the provisions of the court order, and any additional restrictions imposed by the court.

Date: **10/09/2020**

DAN REED

(TYPE OR PRINT NAME)

Telephone No.: **786 223 9985**



(SIGNATURE)

DIRECTOR

(SUPERVISORY POSITION IN MEDIA AGENCY)

NOTICE OF HEARING (A hearing is optional.)

A HEARING will be held as follows:

Date:	Time:	Dept./Div.:	Room:
Address of the Court:			

Clerk, by _____, Deputy

MEDIA AGENCY (name): AMOS Pictures CHANNEL/FREQUENCY NO.: Channel 4 UK, US broadcaster TBC PERSON SUBMITTING REQUEST (name): Dan Reed ADDRESS: 9 Perseverance Works, Kingsland Road, London, E2 8DD TELEPHONE NO.: 786 223 9985	FOR COURT USE ONLY
Insert name of court and name of judicial district and branch court, if any: County of Los Angeles, Santa Monica Courthouse	
TITLE OF CASE: JAMES SAFECHUCK VS DOE 1 ET AL	
NAME OF JUDGE: Honorable Mark A. Young	
ORDER ON MEDIA REQUEST TO PERMIT COVERAGE	CASE NUMBER: BC545264

AGENCY MAKING REQUEST (name):

1. a. ☐ No hearing was held.
 b. ☐ Date of hearing: _____ Time: _____ Dept./Div.: _____ Room: _____
2. The court considered all the relevant factors listed in subdivision (e)(3) of California Rules of Court, rule 1.150 (see reverse).
3. ☐ **THE COURT FINDS** (findings or a statement of decision are optional): ☐ Attached ☐ As follows:

THE COURT ORDERS

4. The request to photograph, record, or broadcast is
- a. ☐ **denied.**
- b. ☒ **granted** subject to the conditions in rule 1.150, California Rules of Court, **AND** the following:
- (1) ☐ The local rules of this court regulating media activity outside the courtroom (copy attached).
- (2) ☐ The order of the presiding or supervising judge regulating media activity outside the courtroom (copy attached).
- (3) ☐ Payment to the clerk of increased court-incurred costs of (specify): \$ _____ to be determined.
- (4) ☒ The media agency shall demonstrate to the court that the proposed personnel and equipment comply with California Rules of Court, rule 1.150, and any local rule or order.
- (5) ☒ Personnel and equipment shall be placed ☒ as directed ☐ as indicated in the attachment ☒ as follows (specify): **DO NOT FILM THE COURT OR COURT STAFF**
- (6) (i) ☐ The attached statement of agreed pooling arrangements is approved.
 (ii) ☒ A statement of agreed pooling arrangements satisfactory to the court shall be filed before coverage begins.
- (7) ☐ This order
 (i) ☐ shall not apply to allow coverage of proceedings that are continued.
 (ii) ☐ shall apply to allow coverage of proceedings that are continued.
- (8) ☐ Other (specify): _____
5. Coverage granted in item 4b is permitted in the following proceedings:
- a. ☒ All proceedings, except those prohibited by California Rules of Court, rule 1.150, and those proceedings prohibited by further court order.
- b. ☐ Only the following proceedings (specify type or date or both): _____
6. ☐ The order made on (date): _____ is ☐ terminated ☐ modified as follows (specify): _____

7. ☐ Number of pages attached:

Date: 10/9/02

(See reverse for additional information)

JUDGE

CASE NAME:

CASE NUMBER:

BC545264

FACTORS CONSIDERED BY THE JUDGE IN MAKING THIS ORDER (Rule 1.150)

- | | |
|---|--|
| <ol style="list-style-type: none"> 1. Importance of maintaining public trust and confidence in the judicial system 2. Importance of promoting public access to the judicial system 3. Parties' support of or opposition to the request 4. Nature of the case 5. Privacy rights of all participants in the proceeding, including witnesses, jurors, and victims 6. Effect on any minor who is a party, prospective witness, victim, or other participant in the proceeding 7. Effect on the parties' ability to select a fair and unbiased jury 8. Effect on any ongoing law enforcement activity in the case 9. Effect on any unresolved identification issues 10. Effect on any subsequent proceedings in the case | <ol style="list-style-type: none"> 11. Effect of coverage on the willingness of witnesses to cooperate, including the risk that coverage will engender threats to the health or safety of any witness 12. Effect on excluded witnesses who would have access to the televised testimony of prior witnesses 13. Scope of the coverage and whether partial coverage might unfairly influence or distract the jury 14. Difficulty of jury selection if a mistrial is declared 15. Security and dignity of the court 16. Undue administrative or financial burden to the court or participants 17. Interference with neighboring courtrooms 18. Maintaining orderly conduct of the proceeding 19. Any other factor the judge deems relevant |
|---|--|

PROHIBITED COVERAGE (Rule 1.150)

This order does not permit photographing, recording, or broadcasting of the following in the court:

- | | |
|---|---|
| <ol style="list-style-type: none"> 1. The jury or the spectators 2. Jury selection 3. A conference between an attorney and a client, witness, or aide 4. A conference between attorneys | <ol style="list-style-type: none"> 5. A conference between counsel and the judge at the bench ("sidebars") 6. A proceeding closed to the public 7. A proceeding held in chambers |
|---|---|

MEDIA PERSONNEL AND EQUIPMENT (Rule 1.150)

NOTE: These requirements apply unless the judge orders otherwise. Refer to the order for additional requirements.

- | | |
|--|--|
| <ol style="list-style-type: none"> 1. No more than one television camera 2. No more than one still photographer 3. No more than one microphone operator and no obtrusive microphones or wiring 4. No operator entry or exit or other distraction when the court is in session 5. No moving equipment when the court is in session | <ol style="list-style-type: none"> 6. No distracting sounds or lights 7. No visible signal light or device that shows when equipment is operating 8. No disruption of proceedings, nor public expense, to install, operate, or remove modifications to existing sound and lighting systems 9. No media agency insignia or marking on equipment or clothing |
|--|--|

SANCTIONS FOR VIOLATING THIS ORDER (Rule 1.150)

Any violation of this order or rule 1.150 is an unlawful interference with the proceedings of the court. The violation may result in an order terminating media coverage, a citation for contempt of court, or an order imposing monetary or other sanctions.

MEDIA AGENCY (name): Nimmer Pictures, Inc. CHANNEL/FREQUENCY NO.: US broadcaster TBD PERSON SUBMITTING REQUEST (name): Laurence Nimmer ADDRESS: 1040 Linden Ave. Unit A Carpinteria, CA 93013 TELEPHONE NO.: 805 708 4753		FOR COURT USE ONLY
Insert name of court and name of judicial district and branch court, if any: Santa Monica Courthouse 1725 Main Street Santa Monica, CA 90401		
TITLE OF CASE: James Safechuck v. Doe 1, et al.		
NAME OF JUDGE: Hon. Mark A. Young		
MEDIA REQUEST TO PHOTOGRAPH, RECORD, OR BROADCAST		CASE NUMBER: BC 545264

1. PORTION OF THE PROCEEDINGS TO BE COVERED (e.g., particular witnesses at trial, the sentencing hearing, etc.):
 Proceedings on Defendants' Demurrer and proceedings in related Robson case
2. DATE OF PROPOSED COVERAGE (specify): October 16, 2020 (File this form at least five court days before the proposed coverage date. If not feasible, explain good cause for noncompliance):
3. TYPE OF COVERAGE
- a. ☒ TV camera and recorder d. ☐ Audio
- b. ☐ Still camera e. ☐ Other (specify):
- c. ☐ Motion picture camera
4. ☐ SPECIAL REQUESTS OR ANTICIPATED PROBLEMS
 (specify): Hon. Mark A. Young
5. ☒ INCREASED COSTS. This agency acknowledges that it will be responsible for increased court-incurred costs, if any, resulting from this media coverage (estimate): \$
☒ Amount unknown
6. PROPOSED ORDER. A completed, proposed order on Judicial Council form MC- 510 is attached (required by Cal. Rules of Court, rule 1.150).

CERTIFICATION

I certify that if the court permits media coverage in this case, all participating personnel in this media agency will be informed of and will abide by the provisions of California Rules of Court, rule 1.150, the provisions of the court order, and any additional restrictions imposed by the court.

Date: 10/7/2020

Laurence Nimmer

(TYPE OR PRINT NAME)

Telephone No.: 805 708 4753


 (SIGNATURE)

President

(SUPERVISORY POSITION IN MEDIA AGENCY)

NOTICE OF HEARING (A hearing is optional.)

A HEARING will be held as follows:

Date:	Time:	Dept./Div:	Room:
Address of the Court:			

Clerk, by _____, Deputy

Form Adopted for Mandatory Use
 Judicial Council of California
 MC-500 [Rev. January 1, 2007]

MEDIA REQUEST TO PHOTOGRAPH, RECORD, OR BROADCAST

Cal. Rules of Court, rule 1.150
www.courts.ca.gov

For your protection and privacy, please press the Clear
 This Form button after you have printed the form.

Print this form

Save this form

Clear this form

Electronically Received 10/07/2020 11:02 AM

MEDIA AGENCY (name): Nimmer Pictures, Inc. CHANNEL/FREQUENCY NO.: US Broadcaster TBD PERSON SUBMITTING REQUEST (name): Laurence Nimmer ADDRESS: 1040 Linden Ave, Unit A, Carpinteria, CA 93013 TELEPHONE NO.: 805 708 4753		FOR COURT USE ONLY CASE NUMBER: BC545264
Insert name of court and name of judicial district and branch court, if any: Los Angeles Superior Court (Santa Monica Courthouse)		
TITLE OF CASE: James Safechuck v. Doe 1, et al.		
NAME OF JUDGE: Hon. Mark A. Young		
ORDER ON MEDIA REQUEST TO PERMIT COVERAGE		

AGENCY MAKING REQUEST (name): Nimmer Pictures, Inc.

1. a. ☐ No hearing was held.
 b. ☐ Date of hearing: _____ Time: _____ Dept./Div.: _____ Room: _____
2. The court considered all the relevant factors listed in subdivision (e)(3) of California Rules of Court, rule 1.150 (see reverse).
3. ☐ THE COURT FINDS (findings or a statement of decision are optional): ☐ Attached ☐ As follows:

THE COURT ORDERS

4. The request to photograph, record, or broadcast is
- a. ☐ denied.
- b. ☒ granted subject to the conditions in rule 1.150, California Rules of Court, AND the following:
- (1) ☐ The local rules of this court regulating media activity outside the courtroom (copy attached).
 - (2) ☐ The order of the presiding or supervising judge regulating media activity outside the courtroom (copy attached).
 - (3) ☐ Payment to the clerk of increased court- incurred costs of (specify): \$ _____ to be determined.
 - (4) ☒ The media agency shall demonstrate to the court that the proposed personnel and equipment comply with California Rules of Court, rule 1.150, and any local rule or order.
 - (5) ☒ Personnel and equipment shall be placed ☒ as directed ☐ as indicated in the attachment ☒ as follows (specify): *Do NOT Film the Court or Court STAFF*
 - (6) (i) ☐ The attached statement of agreed pooling arrangements is approved.
 (ii) ☒ A statement of agreed pooling arrangements satisfactory to the court shall be filed before coverage begins.
 - (7) ☐ This order
 - (i) ☐ shall not apply to allow coverage of proceedings that are continued.
 - (ii) ☐ shall apply to allow coverage of proceedings that are continued.
 - (8) ☐ Other (specify): _____

5. Coverage granted in item 4b is permitted in the following proceedings:
- a. ☒ All proceedings, except those prohibited by California Rules of Court, rule 1.150, and those proceedings prohibited by further court order.
- b. ☐ Only the following proceedings (specify type or date or both): _____
6. ☐ The order made on (date): _____ is ☐ terminated ☐ modified as follows (specify): _____

7. ☐ Number of pages attached:

Date: 10/9/20


 JUDGE

(See reverse for additional information)

CASE NAME:

James Safechuck v. Doe 1, et al.

CASE NUMBER:

BC545264

FACTORS CONSIDERED BY THE JUDGE IN MAKING THIS ORDER (Rule 1.150)

- | | |
|---|--|
| <ol style="list-style-type: none"> 1. Importance of maintaining public trust and confidence in the judicial system 2. Importance of promoting public access to the judicial system 3. Parties' support of or opposition to the request 4. Nature of the case 5. Privacy rights of all participants in the proceeding, including witnesses, jurors, and victims 6. Effect on any minor who is a party, prospective witness, victim, or other participant in the proceeding 7. Effect on the parties' ability to select a fair and unbiased jury 8. Effect on any ongoing law enforcement activity in the case 9. Effect on any unresolved identification issues 10. Effect on any subsequent proceedings in the case | <ol style="list-style-type: none"> 11. Effect of coverage on the willingness of witnesses to cooperate, including the risk that coverage will engender threats to the health or safety of any witness 12. Effect on excluded witnesses who would have access to the televised testimony of prior witnesses 13. Scope of the coverage and whether partial coverage might unfairly influence or distract the jury 14. Difficulty of jury selection if a mistrial is declared 15. Security and dignity of the court 16. Undue administrative or financial burden to the court or participants 17. Interference with neighboring courtrooms 18. Maintaining orderly conduct of the proceeding 19. Any other factor the judge deems relevant |
|---|--|

PROHIBITED COVERAGE (Rule 1.150)

This order does not permit photographing, recording, or broadcasting of the following in the court:

- | | |
|---|---|
| <ol style="list-style-type: none"> 1. The jury or the spectators 2. Jury selection 3. A conference between an attorney and a client, witness, or aide 4. A conference between attorneys | <ol style="list-style-type: none"> 5. A conference between counsel and the judge at the bench ("sidebars") 6. A proceeding closed to the public 7. A proceeding held in chambers |
|---|---|

MEDIA PERSONNEL AND EQUIPMENT (Rule 1.150)

NOTE: These requirements apply unless the judge orders otherwise. Refer to the order for additional requirements.

- | | |
|--|--|
| <ol style="list-style-type: none"> 1. No more than one television camera 2. No more than one still photographer 3. No more than one microphone operator and no obtrusive microphones or wiring 4. No operator entry or exit or other distraction when the court is in session 5. No moving equipment when the court is in session | <ol style="list-style-type: none"> 6. No distracting sounds or lights 7. No visible signal light or device that shows when equipment is operating 8. No disruption of proceedings, nor public expense, to install, operate, or remove modifications to existing sound and lighting systems 9. No media agency insignia or marking on equipment or clothing |
|--|--|

SANCTIONS FOR VIOLATING THIS ORDER (Rule 1.150)

Any violation of this order or rule 1.150 is an unlawful interference with the proceedings of the court. The violation may result in an order terminating media coverage, a citation for contempt of court, or an order imposing monetary or other sanctions.

EXHIBIT C

From: Dan Reed dan@amospictures.co.uk 
Subject: DAN REED / AMOS Pictures / FILMING REQUEST
Date: 24 August 2020 at 13:38
To: Howard L. Weitzman HWeitzman@kwikalaw.com
Cc: Janet Smyth janet@amospictures.co.uk, Marguerite Gaudin marguerite@amospictures.co.uk



Hi Howard,

It was really great to meet you. Hope you had a decent summer.

I've attached a letter which might form the basis for a further conversation around filming.

We plan to return to Los Angeles around September 21st. I do hope we'll be able to continue our acquaintance.

Very best,

Dan

DAN REED

AMOS Pictures



August 24th 2020

Dear Howard,

I trust this finds you safe and well and that you've had a tranquil vacation amid the corona-chaos.

I'd like to thank you for seeing me and Marguerite back in June. We very much enjoyed the encounter and appreciated the cordial spirit in which you conducted it. Having T-Mez there was a thrilling and unexpected bonus. Two legends in one room!

We discussed the possibility of filming with you for our documentary. You kindly offered to consider this and asked what "rules of engagement" we had agreed with Vince Finaldi.

Mr Finaldi summarizes his ROE as follows:

1. Ask any questions you like.
2. Record whatever you want, excluding any privileged communications.
3. Mr Finaldi and his team will make best efforts to be open and accessible to the film crew throughout.

Mr Finaldi presumes – based on experience - that my film crew and I will behave in a fair, considerate and professional manner at all times. We will of course apply the same standards with you, your colleagues and clients.

Happy to jump on a call if that's helpful,

Best regards,

Dan Reed

Producer, Director
AMOS Pictures

+44 7799 645083 (UK cell)
+1 786 223 9985 (USA cell)

9 Perseverance Works, Kingsland Rd, London E2 8DD

www.amospictures.co.uk

office@amospictures.co.uk

Company Registration No. 3511357

Registered Address: 9 Perseverance Works, London, E2 8DD



AMOS Pictures

EXHIBIT D

From: Howard L. Weitzman HWeitzman@kwikalaw.com

Subject: RE: DAN REED FILMING REQUEST

Date: 23 September 2020 at 14:41

To: Dan Reed dan@amospictures.co.uk

Cc: marguerite@amospictures.co.uk, Janet Smyth janet@amospictures.co.uk, Jonathan Steinsapir JSteinsapir@kwikalaw.com, Howard L. Weitzman HWeitzman@kwikalaw.com



Dan:

I have read all your email sent to me or on which I was copied in the last month or so. Sorry I didn't respond more quickly. I needed to think about what the best course of action would be for the client. I have resolved that neither myself or anyone in my offices will participate in the documentary we all discussed for several reasons. Among them is the fact that you are already clearly on the record saying that you believe both accusers' stories without hesitation and you already made a documentary about their stories without even contacting the Estate, the Jackson family or anyone else representing the late Michael Jackson. Appreciate your patience and understanding. Thanks.

Howard Weitzman

[\(310\) 566-9811](tel:3105669811) Dir.

hweitzman@kwikalaw.com

From: Dan Reed <dan@amospictures.co.uk>

Sent: Monday, September 21, 2020 11:27 AM

To: Jonathan Steinsapir <JSteinsapir@kwikalaw.com>

Cc: Howard L. Weitzman <HWeitzman@kwikalaw.com>;
marguerite@amospictures.co.uk; Janet Smyth <janet@amospictures.co.uk>

Subject: Re: DAN REED FILMING REQUEST

Hello Jonathan,

I thought I'd check in with you as we're back in Los Angeles and keen to move the filming conversation forward.

My last two emails to Howard - on August 24th and September 8th - have not received an acknowledgment.

I note that Howard responded within 4 days to my first email back in June, so the lack of an acknowledgment in the last month seems incongruous.

If he is on holiday I'd be grateful for a note to that effect, with an indication of when he will be back in the saddle.

If he's unwell - and I sincerely hope this is not the case - please send him my very best wishes for a speedy recovery.

If however he has resolved not to take part in the documentary, a formal note from him to this effect would be much appreciated.

Best,

Dan

On 27 Jun 2020, at 22:21, Howard L. Weitzman
<HWeitzman@kwikalaw.com> wrote:

Dan:

Office is at 808 Wilshire Blvd., Santa Monica 90401 (south east corner of Lincoln and Wilshire). We are on the third floor but you must check in with security on the first floor. I'll give security the names of Marguerite Gaudin and Dan Reed. The conference room is very large - lots of space - so "social distancing" will not be an issue. Park in garage - entrance off of Lincoln just south of Wilshire. We'll validate. See you at 3 pm on Monday.

HW

Howard Weitzman
(310) 566-9811 Dir.
hweitzman@kwikalaw.com

On Jun 27, 2020, at 4:52 PM, Dan Reed <dan@amospictures.co.uk> wrote:

Howard,

3 at your office sounds perfect.

808 Wilshire, says Google. Is that correct?

We'll see you there.

Best regards,

Dan

On 27 Jun 2020, at 14:04, Howard L. Weitzman
<HWeitzman@kwikalaw.com> wrote:

Dan:

I am planning on seeing you Monday afternoon around 2:30 – 3:00 pm. I have not given any thought to venue. We could use the large conference room at the office **but I understand finding a more neutral venue.** The one venue I've used in the past is closed until July 1. If you really can organize a venue – I'll take you up on that. Let me know your thoughts.

Howard

Howard Weitzman
Kinsella Weitzman Iser Kump & Aldisert LLP
808 Wilshire Blvd., Third Floor

Santa Monica, CA 90401
(310) 566-9811 direct
hweitzman@kwikalaw.com

From: Dan Reed <dan@amospictures.co.uk>
Date: Friday, June 26, 2020 at 3:51 PM
To: Howard Weitzman
<HWeitzman@kwikalaw.com>
Cc: Jonathan Steinsapir
<JSteinsapir@kwikalaw.com>, Marguerite
Gaudin <marguerite@amospictures.co.uk>
Subject: Re: DAN REED FILMING REQUEST

Hi Howard,

Are we meeting Monday afternoon? I do hope so.
Kindly let me know what time and where.

If you'd prefer me to organise a venue I'm happy
to do so.

Best regards,

Dan Reed

On 22 Jun 2020, at 10:43, Howard L.
Weitzman
<HWeitzman@kwikalaw.com> wrote:

Dan:

In answer to your question below I
think it would be interesting to meet
and discuss your idea. I know you
sent an email to Mr. Branca but he
will not be attending any meeting,
at this point, regarding the project.
I'm not sure which day will work for
us at the moment. Your suggested
dates and time seem to be OK. Not
sure what our venue choices are
but we'll figure it all out. Thanks.

Howard

Howard Weitzman
Kinsella Weitzman Iser Kump & Aldisert
LLP
808 Wilshire Blvd., Third Floor
Santa Monica, CA 90401

Santa Monica, CA 90401
(310) 566-9811 direct
hweitzman@kwikalaw.com

From: Dan Reed
<dan@amospictures.co.uk>
Date: Thursday, June 18, 2020 at 8:17 AM
To: Howard Weitzman
<HWeitzman@kwikalaw.com>
Cc: Jonathan Steinsapir
<JSteinsapir@kwikalaw.com>
Subject: DAN REED FILMING REQUEST

Dear Mr Weitzman,

I trust that this finds you healthy and safe in these troubled times.

I made the documentary "Leaving Neverland", which I produced through my London-based company AMOS Pictures for Channel 4 (UK) and HBO.

We are developing with Channel 4 a follow-up documentary chronicling the forthcoming case between Safechuck + Robson and MJJ Ventures + Productions in the California Superior Court.

We aim to follow both sides of this significant story in great detail through the eyes of the defendants, the plaintiffs and their legal teams. The documentary will be broadcast worldwide once the case has been resolved.

The more meaningful access we have to both sides, the more engaging and complete the documentary will be. For me this will also be an opportunity to illuminate the inner workings of the judicial process at a time when coherent storytelling around our core democratic institutions is in short supply.

We would like to film with you and

we would like to meet with you and your team as you tackle these legal proceedings. We would also like to be able to record master interviews with you and the key members of your team; and update these at regular intervals in the process.

Obviously we would discuss with you and take appropriate steps to safeguard the administration of justice in the case.

Perhaps we could discuss this over a suitably distanced cup of coffee or a drink somewhere in Santa Monica on the 29th or 30th of June. What do you think?

Best regards,

Dan

DAN REED

<image001.png>

EXHIBIT E

From: Dan Reed dan@amospictures.co.uk 
Subject: DAN REED FILMING REQUEST
Date: 18 June 2020 at 10:21
To: John Branca johnb@ziffrenlaw.com
Bcc: maggie@amospictures.co.uk, janet@amospictures.co.uk

DR

Hi Mr Branca,

I hope you'll forgive my writing to you out of the blue like this.

I made the HBO documentary "Leaving Neverland", which I produced through my company AMOS Pictures in London.

We are developing a follow-up documentary on the cases brought by James Safechuck and Wade Robson against MJJ Productions et al.

I am seeking meaningful, sustained filming access to both sides of this dispute as it plays out over the coming months or years.

Thanks to your long association with Michael Jackson you are in a unique position to provide context and comment.

With this in mind, I would be most grateful if you would consider granting me an extended interview on camera.

Ideally this would evolve into a series of further reflections and updates as the narrative evolves.

Obviously we would discuss with you and take appropriate steps to safeguard the administration of justice in the cases.

I will be in Los Angeles on the 29th and 30th of June. Perhaps we could discuss a way forward face to (suitably distanced!) face.

Best regards,

Dan

DAN REED



AMOS Pictures

EXHIBIT F

From: Dan Reed dan@amospictures.co.uk 
Subject: INTERVIEW REQUEST / DAN REED / LEAVING NEVERLAND SEQUEL
Date: 23 September 2020 at 12:24
To: Bryan Freedman bfreedman@ftllp.com
Cc: Marguerite Gaudin marguerite@amospictures.co.uk, Janet Smyth janet@amospictures.co.uk



“LEAVING NEVERLAND” FOLLOW-UP DOCUMENTARY / FILMING REQUEST

Dear Bryan,

As you're already aware, I produced and directed the HBO documentary “Leaving Neverland” and am now developing a follow-up documentary chronicling the Safechuck + Robson cases vs. MJJ Ventures + Productions in the California Superior Court. The documentary will be broadcast worldwide once the cases have been resolved.

We aim to follow both sides of this significant story in considerable detail through the eyes of the defendants, the plaintiffs, interested parties and attorneys. The more meaningful the access we have to both sides, the more engaging and complete the documentary will be. For me this is also an opportunity to illuminate the inner workings of the judicial process at a time when coherent storytelling around our core democratic institutions is in short supply. We consider every step of the judicial process to be of interest.

My colleague Marguerite Gaudin and I in Los Angeles to film tomorrow's hearing in Santa Monica.

Your clients Jonathan Spence and Marion Fox are named in four of the motions which will be heard. I am keen to understand their thoughts, feelings and actions in regard to the issues raised in the court case.

I would like to request an interview on camera some time next week with Jonathan and with Marion or failing that with you, to help me clarify your and your clients' views on the case.

I would be delighted to arrange an off-the-record phone call with you and /or with your clients to discuss ground rules and other issues raised by my request.

This message is attached as a separate letter for your convenience.

Sincerely,

Dan



TRL DR >
BRYAN...23.pdf

DAN REED



AMOS Pictures

EXHIBIT G

From: Dan Reed dan@amospictures.co.uk 
Subject: Fwd: LEAVING NEVERLAND PRODUCER / FILMING REQUEST
Date: 8 September 2020 at 10:47
To: Gerald Siegel jsiegel@tharpe-howell.com, Richard Moore rmoore@tharpe-howell.com
Cc: Janet Smyth janet@amospictures.co.uk, Marguerite Gaudin marguerite@amospictures.co.uk



Mr Siegel, Mr Moore,

In case you missed my email of August 28th and the letter attached to it, I've pasted the letter's contents into the body of this email for your convenience.

Happy to set up a call if that's easier than writing.

August 28th, 2020

"LEAVING NEVERLAND" FOLLOW-UP / DOCUMENTARY FILMING REQUEST

Gerald Siegel, Esq.

Richard Moore, Esq.

Tharpe & Howell LLP

15250 Ventura Blvd

Sherman Oaks, CA 91403

Dear Messrs. Siegel and Moore,

I hope you will excuse me for writing out of the blue.

My enquiry relates to your clients Lily Chandler and Tabitha Rose Marks, in the case of Wade Robson vs. MJJ Productions and MJJ Ventures.

I produced and directed the documentary "Leaving Neverland", broadcast on HBO in March 2019. If you or your clients are not familiar with the documentary, I would be happy to make a screener available.

I am developing, through my London-based production house AMOS Pictures, a follow-up documentary chronicling the James Safechuck and Wade Robson cases in the California Superior Court. This entirely new documentary will be broadcast worldwide once the cases have been resolved.

We aim to follow both sides of this current story in considerable detail through the eyes of the defendants, the plaintiffs, interested parties and attorneys. The more meaningful the access we have to both sides, the more comprehensive and multi-faceted the documentary will be.

We view this production also as an opportunity to illuminate the inner workings of the judicial process at a time when coherent storytelling around our core democratic institutions is in short supply. So we consider every step of the judicial process to be of interest.

I would be grateful if you would consider giving me an interview on camera to help me clarify your views on the case and its conduct.

We are planning a filming trip to Los Angeles to coincide with the upcoming hearing on September 24th.

A first step might be to arrange an off-the-record phone call with you to discuss any issues raised by my request. When would be convenient?

Sincerely,

Dan

DAN REED



AMOS Pictures

Begin forwarded message:

From: Dan Reed <dan@amospictures.co.uk>

Subject: **LEAVING NEVERLAND PRODUCER / FILMING REQUEST**

Date: 28 August 2020 at 12:16:29 GMT-4

To: Gerald Siegel <jsiegel@tharpe-howell.com>, Richard Moore <rmoore@tharpe-howell.com>

Cc: Janet Smyth <janet@amospictures.co.uk>, Marguerite Gaudin <marguerite@amospictures.co.uk>



TRL DR >
SIEGEL...28.pdf

EXHIBIT H

From: Dan Reed <dan@amospictures.co.uk>
Subject: Fwd: Leaving Neverland producer / interview request
Date: 22 September 2020 at 17:22:15 GMT-7
To: Suann MacIsaac <smacisaac@kwikalaw.com>
Cc: Janet Smyth <janet@amospictures.co.uk>, Marguerite Gaudin
<marguerite@amospictures.co.uk>

Hi Suann,

I'd be grateful if you could acknowledge receipt of the email below and the attached letter.

Best,

Dan

DAN REED

Begin forwarded message:

From: Dan Reed <dan@amospictures.co.uk>
Subject: Leaving Neverland producer / interview request
Date: 28 August 2020 at 09:34:18 GMT-7
To: Suann MacIsaac <smacisaac@kwikalaw.com>
Cc: Janet Smyth <janet@amospictures.co.uk>, Marguerite Gaudin
<marguerite@amospictures.co.uk>

Hi Suann,

I produced and directed the documentary "Leaving Neverland", broadcast on HBO in March 2019.

My enquiry relates to your client Leroy Whaley in the case of Wade Robson vs. MJJ Productions and MJJ Ventures.

I should mention that I am already in contact with Mr Weitzman regarding the broader aspects of the Robson and Safechuck cases.

Please see attached letter.

Best,

Dan

DAN REED

EXHIBIT I

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Suann MacIsaac (SBN 205659) Jonathan Steinsapir (SBN 226281) Kinsella Weitzman Iser Kump & Aldisert LLP 808 Wilshire Blvd., Suite 300 Santa Monica, CA 90401 TELEPHONE NO.: 310-566-9800 FAX NO. (Optional): 310-566-9850 E-MAIL ADDRESS (Optional): smacisaac@kwikalaw.com; jsteinsapir@kwiklaw.com ATTORNEY FOR (Name): MJJ Productions, Inc., MJJ Ventures, Inc.		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 1725 Main Street MAILING ADDRESS: 1725 Main Street, Santa Monica, CA 90401 CITY AND ZIP CODE: Santa Monica 90401 BRANCH NAME: Santa Monica Courthouse		
PLAINTIFF/PETITIONER: WADE ROBSON DEFENDANT/RESPONDENT: MJJ PRODUCTIONS, INC.		
DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE AND PRODUCTION OF DOCUMENTS AND THINGS		CASE NUMBER: BC508502

THE PEOPLE OF THE STATE OF CALIFORNIA, TO *(name, address, and telephone number of deponent, if known)*:
Custodian of Records for Amos Pictures, Ltd. c/o Santa Monica Superior Court, Department M, 1725 Main St., Santa
Monica, CA 90401

1. YOU ARE ORDERED TO APPEAR IN PERSON TO TESTIFY AS A WITNESS in this action at the following date, time, and place:

Date: October 21, 2020 Time: 10:00 a.m. Address: 808 Wilshire Blvd., Suite 300, Santa Monica, CA 90401

- a. ☐ As a deponent who is not a natural person, you are ordered to designate one or more persons to testify on your behalf as to the matters described in item 4. (Code Civ. Proc., § 2025.230.)
- b. ☒ You are ordered to produce the documents and things described in item 3.
- c. ☒ This deposition will be recorded stenographically ☒ through the instant visual display of testimony and by ☐ audiotape ☒ videotape.
- d. ☒ This videotape deposition is intended for possible use at trial under Code of Civil Procedure section 2025.620(d).
2. The personal attendance of the custodian or other qualified witness and the production of the original records are required by this subpoena. The procedure authorized by Evidence Code sections 1560(b), 1561, and 1562 will not be deemed sufficient compliance with this subpoena.
3. The documents and things to be produced and any testing or sampling being sought are described as follows:
SEE ATTACHMENT 3 HERETO
- ☒ Continued on Attachment 3.
4. If the witness is a representative of a business or other entity, the matters upon which the witness is to be examined are described as follows:
☐ Continued on Attachment 4.
5. **IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.**
6. *At the deposition, you will be asked questions under oath. Questions and answers are recorded stenographically at the deposition; later they are to receive witness fees and mileage actually traveled both ways. The money must be paid, at the option of the party giving notice of the deposition, either with service of this subpoena or at the time of the deposition. Unless the court orders or you agree otherwise, if you are being deposed as an agent of the court where the action is pending. The location of the deposition for all deponents is governed by Code of Civil Procedure section 2025.250.*

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF \$500 AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: September 21, 2020

▶ Wiederholungsfragen

(SIGNATURE OF PERSON ISSUING SUBPOENA)

Jonathan Steinsapir

Attorneys for MJJ Productions, Inc. MJJ Ventures, Inc.

(TYPE OR PRINT NAME)

(Proof of service on reverse)

(TITLE)

Page 1 of 2

10386-00226/708052.1 1

PLAINTIFF/PETITIONER: WADE ROBSON

CASE NUMBER

BC508502

DEFENDANT/RESPONDENT: MJJ PRODUCTIONS, INC.

**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE
AND PRODUCTION OF DOCUMENTS AND THINGS**

1. I served this *Deposition Subpoena for Personal Appearance and Production of Documents and Things* by personally delivering a copy to the person served as follows:

a. Person served (*name*):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. Witness fees and mileage both ways (*check one*):

(1) ☐ were paid. Amount: \$ _____

(2) ☐ were not paid.

(3) ☐ were tendered to the witness's
public entity employer as
required by Government Code
section 68097.2. The amount
tendered was (*specify*): \$ _____

f. Fee for service: \$ _____

2. I received this subpoena for service on (*date*):

3. Person serving:

a. ☐ Not a registered California process server

b. ☐ California sheriff or marshal

c. ☐ Registered California process server

d. ☐ Employee or independent contractor of a registered California process server

e. ☐ Exempt from registration under Business and Professions Code section 22350(b)

f. ☐ Registered professional photocopier

g. ☐ Exempt from registration under Business and Professions Code section 22451

h. Name, address, telephone number, and, if applicable, county of registration and number:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

(For California sheriff or marshal use only)

I certify that the foregoing is true and correct.

Date:

▶

(SIGNATURE)

▶

(SIGNATURE)

ATTACHMENT 3

DEFINITIONS

A. The term "DOCUMENT" or "DOCUMENTS" means a writing, as defined in Evidence Code section 250, and includes but is not limited to e-mail, audio or videotape recordings, microfilm, computer disks, computer printouts and computer cards.

B. The term "PERSON" includes a natural person, firm, association, organization, partnership, business, corporation, company.

C. The terms "YOU" or "YOUR" means Dan Reed and/or Amos Productions, Ltd. and all of his or its present and former employees, agents, officers, representatives, attorneys, accountants, auditors, partners or partnerships, affiliates, successors, predecessors, parents, subsidiaries, and any other PERSON acting on his or its behalf or under his or its direction or control.

D. The term "COMMUNICATION" means every exchange of information of any nature, whether oral or written, from one PERSON to another, and any evidence of such exchange, including but not limited to, any correspondence, memorandum, electronic mail, text messages, App based messages, instant messages, social media posts and messages, notes or logs of meetings, diaries, daily calendars, or other records of exchanges between or among PERSONS.

E. The terms "RELATING TO" and "RELATE(S) TO" shall be construed to mean embodying, comprising, referring to, constituting, containing, memorializing, evidencing, describing, reflecting, identifying, supporting, analyzing, discussing, mentioning, summarizing, stating, or pertaining in any way to, in whole or in part, the stated subject matter. DOCUMENTS and COMMUNICATIONS "RELATING TO" or that "RELATE(S) TO" the subject matter specified in a Request for Production include, without limitation, DOCUMENTS and COMMUNICATIONS underlying or supporting, or utilized in the preparation of, any DOCUMENTS or COMMUNICATIONS responsive to each Request for Production.

F. The term "EVIDENCING" shall be construed to mean actually embodying, reflecting, evidencing and/or memorializing the stated subject matter.

G. The Term "MANLY STEWART & FINALDI" refers to Manly Steward & Finaldi

1 and all of its present and former employees, agents, representatives, attorneys, accountants,
2 auditors, partners or partnerships, affiliates, successors, predecessors, parents, subsidiaries, and
3 any other PERSON acting on its behalf or under its direction or control.

4 H. The term "*Leaving Neverland*" refers to the 2019 documentary film that YOU
5 and/or Amos Productions, Ltd. produced relating to Michael Jackson's alleged abuse of Wade
6 Robson and James Safechuck.

7 I. The term "ACTION" refers to the case entitled *Wade Robson v. MJJ Productions,*
8 *Inc. et al.*, Case No. BC 508502, pending in Los Angeles County Superior Court.

9
10 **REQUESTS FOR PRODUCTION**

11 **REQUEST FOR PRODUCTION NO. 1:**

12 All raw footage of the video-recorded interview(s) of Wade Robson (whether or not the
13 footage ultimately appeared in the film *Leaving Neverland*).

14 **REQUEST FOR PRODUCTION NO. 2:**

15 All raw footage of the video-recorded interview(s) of Joy Robson (whether or not the
16 footage ultimately appeared in the film *Leaving Neverland*).

17 **REQUEST FOR PRODUCTION NO. 3:**

18 All raw footage of the video-recorded interview(s) of Chantal Robson (whether or not the
19 footage ultimately appeared in the film *Leaving Neverland*).

20 **REQUEST FOR PRODUCTION NO. 4:**

21 All raw footage of the video-recorded interview(s) of Amanda Robson (whether or not the
22 footage ultimately appeared in the film *Leaving Neverland*).

23 **REQUEST FOR PRODUCTION NO. 5:**

24 All raw footage of the video-recorded interview(s) of Shane Robson (whether or not the
25 footage ultimately appeared in the film *Leaving Neverland*).

26 **REQUEST FOR PRODUCTION NO. 6:**

27 All raw footage of the video-recorded interview(s) of Lorraine Jean Cullen (whether or not
28 the footage ultimately appeared in the film *Leaving Neverland*).

1 **REQUEST FOR PRODUCTION NO. 7:**

2 All raw footage of video-recorded interview(s) conducted for the film *Leaving Neverland*,
3 whether or not any portion of the interview ultimately appeared in the film.

4 **REQUEST FOR PRODUCTION NO. 8:**

5 All contracts and releases entered into or executed by Wade Robson in connection with the
6 film *Leaving Neverland*.

7 **REQUEST FOR PRODUCTION NO. 9:**

8 All contracts and releases entered into or executed by Joy Robson, Chantal Robson,
9 Amanda Robson, Shane Robson and/or Lorraine Jean Cullen in connection with the film *Leaving*
10 *Neverland*.

11 **REQUEST FOR PRODUCTION NO. 10:**

12 All DOCUMENTS EVIDENCING payment to Wade Robson (directly or indirectly
13 through a representative and/or affiliated PERSON, including without limitation, MANLY
14 STEWART & FINALDI) for his participation in the film *Leaving Neverland*.

15 **REQUEST FOR PRODUCTION NO. 11:**

16 All DOCUMENTS EVIDENCING payment to Joy Robson, Chantal Robson, Amanda
17 Robson, Shane Robson and/or Lorraine Jean Cullen (directly or indirectly through a representative
18 and/or affiliated PERSON, including without limitation, MANLY STEWART & FINALDI) for
19 any of their participation in the film *Leaving Neverland*.

20 **REQUEST FOR PRODUCTION NO. 12:**

21 All COMMUNICATIONS (or DOCUMENTS EVIDENCING COMMUNICATIONS)
22 with Wade Robson and/or his representatives, including without limitation MANLY STEWART
23 & FINALDI, RELATING TO Wade Robson's claim that he was molested by Michael Jackson.

24 **REQUEST FOR PRODUCTION NO. 13:**

25 All COMMUNICATIONS (or DOCUMENTS EVIDENCING COMMUNICATIONS)
26 with Wade Robson and/or his representatives, including without limitation MANLY STEWART
27 & FINALDI, RELATING TO Wade Robson's participation in *Leaving Neverland*.

28

REQUEST FOR PRODUCTION NO. 14:

All COMMUNICATIONS (or DOCUMENTS EVIDENCING COMMUNICATIONS) with Joy Robson, Chantal Robson, Amanda Robson, Shane Robson and/or Lorraine Jean Cullen and/or any of their representatives, including without limitation MANLY STEWART & FINALDI, RELATING TO Wade Robson's claim that he was molested by Michael Jackson.

REQUEST FOR PRODUCTION NO. 15:

All COMMUNICATIONS (or DOCUMENTS EVIDENCING COMMUNICATIONS) with Joy Robson, Chantal Robson, Amanda Robson, Shane Robson and/or Lorraine Jean Cullen and/or any of their representatives, including without limitation MANLY STEWART & FINALDI, RELATING TO Wade Robson's and/or any of their participation in *Leaving Neverland*.

REQUEST FOR PRODUCTION NO. 16:

All COMMUNICATIONS (or DOCUMENTS EVIDENCING COMMUNICATIONS) with any PERSON RELATING TO Wade Robson's claim that he was molested by Michael Jackson.

REQUEST FOR PRODUCTION NO. 17:

All COMMUNICATIONS (or DOCUMENTS EVIDENCING COMMUNICATIONS) with any PERSON RELATING TO his, her, or its participation or potential participation in *Leaving Neverland*.

REQUEST FOR PRODUCTION NO. 18:

All COMMUNICATIONS (or DOCUMENTS EVIDENCING COMMUNICATIONS) with any PERSON who was interviewed in connection with *Leaving Neverland* (whether or not the PERSON ultimately appeared in the film *Leaving Neverland*).

REQUEST FOR PRODUCTION NO. 19:

All COMMUNICATIONS (or DOCUMENTS EVIDENCING COMMUNICATIONS) between or among YOU and any PERSON(s) from whom YOU ever requested or sought an interview in connection with *Leaving Neverland*, but who did not appear in *Leaving Neverland* (or who only appeared by way of archive footage that was not specifically recorded for *Leaving*

1 *Neverland*).

2 **REQUEST FOR PRODUCTION NO. 20:**

3 All COMMUNICATIONS (or DOCUMENTS EVIDENCING COMMUNICATIONS)
4 transmitting or explaining photographs, audio clips, video clips, letters, faxes, gifts, mementos,
5 and/or memorabilia supplied by Wade Robson, Joy Robson, Chantal Robson, Amanda Robson,
6 Shane Robson, Lorraine Jean Cullen, any other family member of Wade Robson, and/or any of
7 their representatives, including without limitation MANLY STEWART & FINALDI, for use or
8 potential use in the film *Leaving Neverland*.

9 **REQUEST FOR PRODUCTION NO. 21:**

10 All DOCUMENTS and COMMUNICATIONS that RELATE TO YOUR efforts to fact
11 check any statements or claims made by any PERSON interviewed for *Leaving Neverland*
12 (whether or not the PERSON ultimately appeared in the film *Leaving Neverland*).

13 **REQUEST FOR PRODUCTION NO. 22:**

14 All COMMUNICATIONS (or DOCUMENTS EVIDENCING COMMUNICATIONS)
15 that RELATE to YOUR and/or any other PERSON'S attempt to get a comment from any
16 PERSON for use or potential use in *Leaving Neverland* (whether or not the comment was
17 ultimately used in the film *Leaving Neverland*).

18 **REQUEST FOR PRODUCTION NO. 23:**

19 All COMMUNICATIONS (or DOCUMENTS EVIDENCING COMMUNICATIONS)
20 that RELATE to the need to re-shoot, re-create, and/or re-stage any interview or portion of any
21 interview that was shot in connection with the film *Leaving Neverland*.

22 **REQUEST FOR PRODUCTION NO. 24:**

23 All COMMUNICATIONS (or DOCUMENTS EVIDENCING COMMUNICATIONS)
24 with Wade Robson and/or his representatives, including without limitation MANLY STEWART
25 & FINALDI, regarding a possible future film or television program RELATING TO Wade
26 Robson, his allegations that he was molested by Michael Jackson, and/or the ACTION.

27 **REQUEST FOR PRODUCTION NO. 25:**

28 All raw footage (including any video-recorded interviews) created for potential use in a

1 future film or television program RELATING TO Wade Robson, his allegations that he was
2 molested by Michael Jackson, and/or the ACTION.

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EXHIBIT J

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Suánn MacIsaac (SBN 205659) Jonathan Steinsapir (SBN 226281) Kinsella Weitzman Iser Kump & Aldisert LLP 808 Wilshire Blvd., Suite 300 Santa Monica, CA 90401 TELEPHONE NO. 310-566-9800 FAX NO. (Optional) 310-566-9850 E-MAIL ADDRESS (Optional) smacisaac@kwiklaw.com; jsteinsapir@kwiklaw.com ATTORNEY FOR (Name) MJJ Productions, Inc., MJJ Ventures, Inc.		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 1725 Main Street MAILING ADDRESS: 1725 Main Street, Santa Monica, CA 90401 CITY AND ZIP CODE: Santa Monica 90401 BRANCH NAME: Santa Monica Courthouse		
PLAINTIFF/PETITIONER: WADE ROBSON DEFENDANT/RESPONDENT: MJJ PRODUCTIONS, INC.		
DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE AND PRODUCTION OF DOCUMENTS AND THINGS		CASE NUMBER: BC508502

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):
 Dan Reed c/o Santa Monica Superior Court, Department M, 1725 Main St., Santa Monica, CA 90401

1. YOU ARE ORDERED TO APPEAR IN PERSON TO TESTIFY AS A WITNESS in this action at the following date, time, and place:

Date: **October 22, 2020** Time: **10:00 a.m.** Address: **808 Wilshire Blvd., Suite 300, Santa Monica, CA 90401**

- ☐ As a deponent who is not a natural person, you are ordered to designate one or more persons to testify on your behalf as to the matters described in item 4. (Code Civ. Proc., § 2025.230.)
 - ☒ You are ordered to produce the documents and things described in item 3.
 - ☒ This deposition will be recorded stenographically ☒ through the instant visual display of testimony and by ☐ audiotape ☒ videotape.
 - ☒ This videotape deposition is intended for possible use at trial under Code of Civil Procedure section 2025.620(d).
- The personal attendance of the custodian or other qualified witness and the production of the original records are required by this subpoena. The procedure authorized by Evidence Code sections 1560(b), 1561, and 1562 will not be deemed sufficient compliance with this subpoena.
 - The documents and things to be produced and any testing or sampling being sought are described as follows:
SEE ATTACHMENT 3 HERETO

☒ Continued on Attachment 3.
 - If the witness is a representative of a business or other entity, the matters upon which the witness is to be examined are described as follows:
☐ Continued on Attachment 4.
 - IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.**
 - At the deposition, you will be asked questions under oath. Questions and answers are recorded stenographically at the deposition; later they are transcribed for possible use at trial. You may read the written record and change any incorrect answers before you sign the deposition. You are entitled to receive witness fees and mileage actually traveled both ways. The money must be paid, at the option of the party giving notice of the deposition, either with service of this subpoena or at the time of the deposition. Unless the court orders or you agree otherwise, if you are being deposed as an individual, the deposition must take place within 75 miles of your residence or within 150 miles of your residence if the deposition will be taken within the county of the court where the action is pending. The location of the deposition for all deponents is governed by Code of Civil Procedure section 2025.250.*

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF \$500 AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: **September 21, 2020**



(SIGNATURE OF PERSON ISSUING SUBPOENA)

Jonathan Steinsapir

Attorneys for MJJ Productions, Inc. MJJ Ventures, Inc.

(TYPE OR PRINT NAME)

(Proof of service on reverse)

(TITLE)

Page 1 of 2

PLAINTIFF/PETITIONER: WADE ROBSON

CASE NUMBER
BC508502

DEFENDANT/RESPONDENT: MJJ PRODUCTIONS, INC.

**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE
AND PRODUCTION OF DOCUMENTS AND THINGS**

1. I served this *Deposition Subpoena for Personal Appearance and Production of Documents and Things* by personally delivering a copy to the person served as follows:

a. Person served (*name*):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. Witness fees and mileage both ways (*check one*):

(1) ☐ were paid. Amount: \$ _____

(2) ☐ were not paid.

(3) ☐ were tendered to the witness's
public entity employer as
required by Government Code
section 68097.2. The amount
tendered was (*specify*): \$ _____

f. Fee for service: \$ _____

2. I received this subpoena for service on (*date*):

3. Person serving:

a. ☐ Not a registered California process server

b. ☐ California sheriff or marshal

c. ☐ Registered California process server

d. ☐ Employee or independent contractor of a registered California process server

e. ☐ Exempt from registration under Business and Professions Code section 22350(b)

f. ☐ Registered professional photocopier

g. ☐ Exempt from registration under Business and Professions Code section 22451

h. Name, address, telephone number, and, if applicable, county of registration and number:

I **declare** under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

(For California sheriff or marshal use only)

I **certify** that the foregoing is true and correct.

Date:

▶

(SIGNATURE)

▶

(SIGNATURE)

ATTACHMENT 3

DEFINITIONS

A. The term "DOCUMENT" or "DOCUMENTS" means a writing, as defined in Evidence Code section 250, and includes but is not limited to e-mail, audio or videotape recordings, microfilm, computer disks, computer printouts and computer cards.

B. The term "PERSON" includes a natural person, firm, association, organization, partnership, business, corporation, company.

C. The terms "YOU" or "YOUR" means Dan Reed and/or Amos Productions, Ltd. and all of his or its present and former employees, agents, officers, representatives, attorneys, accountants, auditors, partners or partnerships, affiliates, successors, predecessors, parents, subsidiaries, and any other PERSON acting on his or its behalf or under his or its direction or control.

D. The term "COMMUNICATION" means every exchange of information of any nature, whether oral or written, from one PERSON to another, and any evidence of such exchange, including but not limited to, any correspondence, memorandum, electronic mail, text messages, App based messages, instant messages, social media posts and messages, notes or logs of meetings, diaries, daily calendars, or other records of exchanges between or among PERSONS.

E. The terms "RELATING TO" and "RELATE(S) TO" shall be construed to mean embodying, comprising, referring to, constituting, containing, memorializing, evidencing, describing, reflecting, identifying, supporting, analyzing, discussing, mentioning, summarizing, stating, or pertaining in any way to, in whole or in part, the stated subject matter. DOCUMENTS and COMMUNICATIONS "RELATING TO" or that "RELATE(S) TO" the subject matter specified in a Request for Production include, without limitation, DOCUMENTS and COMMUNICATIONS underlying or supporting, or utilized in the preparation of, any DOCUMENTS or COMMUNICATIONS responsive to each Request for Production.

F. The term "EVIDENCING" shall be construed to mean actually embodying, reflecting, evidencing and/or memorializing the stated subject matter.

G. The Term "MANLY STEWART & FINALDI" refers to Manly Steward & Finaldi

1 and all of its present and former employees, agents, representatives, attorneys, accountants,
2 auditors, partners or partnerships, affiliates, successors, predecessors, parents, subsidiaries, and
3 any other PERSON acting on its behalf or under its direction or control.

4 H. The term “*Leaving Neverland*” refers to the 2019 documentary film that YOU
5 and/or Amos Productions, Ltd. produced relating to Michael Jackson’s alleged abuse of Wade
6 Robson and James Safechuck.

7 I. The term “ACTION” refers to the case entitled *Wade Robson v. MJJ Productions,*
8 *Inc. et al.*, Case No. BC 508502, pending in Los Angeles County Superior Court.

9
10 **REQUESTS FOR PRODUCTION**

11 **REQUEST FOR PRODUCTION NO. 1:**

12 All raw footage of the video-recorded interview(s) of Wade Robson (whether or not the
13 footage ultimately appeared in the film *Leaving Neverland*).

14 **REQUEST FOR PRODUCTION NO. 2:**

15 All raw footage of the video-recorded interview(s) of Joy Robson (whether or not the
16 footage ultimately appeared in the film *Leaving Neverland*).

17 **REQUEST FOR PRODUCTION NO. 3:**

18 All raw footage of the video-recorded interview(s) of Chantal Robson (whether or not the
19 footage ultimately appeared in the film *Leaving Neverland*).

20 **REQUEST FOR PRODUCTION NO. 4:**

21 All raw footage of the video-recorded interview(s) of Amanda Robson (whether or not the
22 footage ultimately appeared in the film *Leaving Neverland*).

23 **REQUEST FOR PRODUCTION NO. 5:**

24 All raw footage of the video-recorded interview(s) of Shane Robson (whether or not the
25 footage ultimately appeared in the film *Leaving Neverland*).

26 **REQUEST FOR PRODUCTION NO. 6:**

27 All raw footage of the video-recorded interview(s) of Lorraine Jean Cullen (whether or not
28 the footage ultimately appeared in the film *Leaving Neverland*).

REQUEST FOR PRODUCTION NO. 7:

All raw footage of video-recorded interview(s) conducted for the film *Leaving Neverland*, whether or not any portion of the interview ultimately appeared in the film.

REQUEST FOR PRODUCTION NO. 8:

All contracts and releases entered into or executed by Wade Robson in connection with the film *Leaving Neverland*.

REQUEST FOR PRODUCTION NO. 9:

All contracts and releases entered into or executed by Joy Robson, Chantal Robson, Amanda Robson, Shane Robson and/or Lorraine Jean Cullen in connection with the film *Leaving Neverland*.

REQUEST FOR PRODUCTION NO. 10:

All DOCUMENTS EVIDENCING payment to Wade Robson (directly or indirectly through a representative and/or affiliated PERSON, including without limitation, MANLY STEWART & FINALDI) for his participation in the film *Leaving Neverland*.

REQUEST FOR PRODUCTION NO. 11:

All DOCUMENTS EVIDENCING payment to Joy Robson, Chantal Robson, Amanda Robson, Shane Robson and/or Lorraine Jean Cullen (directly or indirectly through a representative and/or affiliated PERSON, including without limitation, MANLY STEWART & FINALDI) for any of their participation in the film *Leaving Neverland*.

REQUEST FOR PRODUCTION NO. 12:

All COMMUNICATIONS (or DOCUMENTS EVIDENCING COMMUNICATIONS) with Wade Robson and/or his representatives, including without limitation MANLY STEWART & FINALDI, RELATING TO Wade Robson's claim that he was molested by Michael Jackson.

REQUEST FOR PRODUCTION NO. 13:

All COMMUNICATIONS (or DOCUMENTS EVIDENCING COMMUNICATIONS) with Wade Robson and/or his representatives, including without limitation MANLY STEWART & FINALDI, RELATING TO Wade Robson's participation in *Leaving Neverland*.

REQUEST FOR PRODUCTION NO. 14:

All COMMUNICATIONS (or DOCUMENTS EVIDENCING COMMUNICATIONS) with Joy Robson, Chantal Robson, Amanda Robson, Shane Robson and/or Lorraine Jean Cullen and/or any of their representatives, including without limitation MANLY STEWART & FINALDI, RELATING TO Wade Robson's claim that he was molested by Michael Jackson.

REQUEST FOR PRODUCTION NO. 15:

All COMMUNICATIONS (or DOCUMENTS EVIDENCING COMMUNICATIONS) with Joy Robson, Chantal Robson, Amanda Robson, Shane Robson and/or Lorraine Jean Cullen and/or any of their representatives, including without limitation MANLY STEWART & FINALDI, RELATING TO Wade Robson's and/or any of their participation in *Leaving Neverland*.

REQUEST FOR PRODUCTION NO. 16:

All COMMUNICATIONS (or DOCUMENTS EVIDENCING COMMUNICATIONS) with any PERSON RELATING TO Wade Robson's claim that he was molested by Michael Jackson.

REQUEST FOR PRODUCTION NO. 17:

All COMMUNICATIONS (or DOCUMENTS EVIDENCING COMMUNICATIONS) with any PERSON RELATING TO his, her, or its participation or potential participation in *Leaving Neverland*.

REQUEST FOR PRODUCTION NO. 18:

All COMMUNICATIONS (or DOCUMENTS EVIDENCING COMMUNICATIONS) with any PERSON who was interviewed in connection with *Leaving Neverland* (whether or not the PERSON ultimately appeared in the film *Leaving Neverland*).

REQUEST FOR PRODUCTION NO. 19:

All COMMUNICATIONS (or DOCUMENTS EVIDENCING COMMUNICATIONS) between or among YOU and any PERSON(s) from whom YOU ever requested or sought an interview in connection with *Leaving Neverland*, but who did not appear in *Leaving Neverland* (or who only appeared by way of archive footage that was not specifically recorded for *Leaving*

1 *Neverland*).

2 **REQUEST FOR PRODUCTION NO. 20:**

3 All COMMUNICATIONS (or DOCUMENTS EVIDENCING COMMUNICATIONS)
4 transmitting or explaining photographs, audio clips, video clips, letters, faxes, gifts, mementos,
5 and/or memorabilia supplied by Wade Robson, Joy Robson, Chantal Robson, Amanda Robson,
6 Shane Robson, Lorraine Jean Cullen, any other family member of Wade Robson, and/or any of
7 their representatives, including without limitation MANLY STEWART & FINALDI, for use or
8 potential use in the film *Leaving Neverland*.

9 **REQUEST FOR PRODUCTION NO. 21:**

10 All DOCUMENTS and COMMUNICATIONS that RELATE TO YOUR efforts to fact
11 check any statements or claims made by any PERSON interviewed for *Leaving Neverland*
12 (whether or not the PERSON ultimately appeared in the film *Leaving Neverland*).

13 **REQUEST FOR PRODUCTION NO. 22:**

14 All COMMUNICATIONS (or DOCUMENTS EVIDENCING COMMUNICATIONS)
15 that RELATE to YOUR and/or any other PERSON'S attempt to get a comment from any
16 PERSON for use or potential use in *Leaving Neverland* (whether or not the comment was
17 ultimately used in the film *Leaving Neverland*).

18 **REQUEST FOR PRODUCTION NO. 23:**

19 All COMMUNICATIONS (or DOCUMENTS EVIDENCING COMMUNICATIONS)
20 that RELATE to the need to re-shoot, re-create, and/or re-stage any interview or portion of any
21 interview that was shot in connection with the film *Leaving Neverland*.

22 **REQUEST FOR PRODUCTION NO. 24:**

23 All COMMUNICATIONS (or DOCUMENTS EVIDENCING COMMUNICATIONS)
24 with Wade Robson and/or his representatives, including without limitation MANLY STEWART
25 & FINALDI, regarding a possible future film or television program RELATING TO Wade
26 Robson, his allegations that he was molested by Michael Jackson, and/or the ACTION.

27 **REQUEST FOR PRODUCTION NO. 25:**

28 All raw footage (including any video-recorded interviews) created for potential use in a

1 future film or television program RELATING TO Wade Robson, his allegations that he was
2 molested by Michael Jackson, and/or the ACTION.

EXHIBIT K

AMOS Pictures



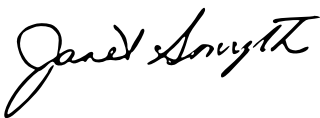
Paris Jackson
c/o Tom Hamilton
Stiefel Entertainment
21731 Ventura Blvd, Ste 300
Woodland Hills, CA 91364
Via contact@stiefelEnt.com

10 January 2019

Dear Ms Jackson

I am writing to inform you that Amos Pictures has made a two-part, four-hour documentary about Michael Jackson which will air on Channel 4 in the UK early this year. The film examines allegations of sexual abuse against young boys made against Mr Jackson and carries testimony from men who speak about their childhood experiences with Mr Jackson, as well as examining the issue more widely. A version of the film is being screened at the Sundance Film Festival later this month. Once the broadcast date is final we will advise you of that.

Yours faithfully

PP 

Dan Reed

EXHIBIT L

The Guardian

Jackson's lawyer fires warning to accusers

Associated Press

Wed 26 Nov 2003 00.01 GMT

Michael Jackson's attorney today went on the offensive and promised to "land like a ton of bricks" on anyone who besmirches his client's reputation.

Mark Geragos, who is defending the singer against child molestation charges, told a special press conference that such allegations were motivated by money.

"If anybody doesn't think, based upon what's happened so far, that the true motivation of these charges and these allegations is anything but money and the seeking of money, then they're living in their own Neverland," Mr Geragos said, referring to Jackson's fantasy home near Santa Barbara, California.

He called the news conference following revelations that he and Jackson had been secretly videotaped while flying on a private jet to Santa Barbara for Jackson's surrender to police last week.

Mr Geragos, who did not take any questions, promised a vigorous defence and said: "Michael Jackson is not going to be slammed."

In a lawsuit filed against Santa Monica-based XtraJet yesterday, Mr Geragos claimed that the charter company had covertly installed two cameras in the cabin of the plane used by Jackson last week.

Jackson's attorneys won a temporary restraining order, barring any release of the tapes, against XtraJet.

The cameras "were recording attorney-client conversations and then somebody had the unmitigated gall to shop those tapes around to media outlets in order to sell them to the highest bidder", Mr Geragos said.

FBI spokesman Matthew McLaughlin said that agents had gone to the headquarters of XtraJet. "We're currently assessing if a federal violation has occurred," he added.

The tapes' existence came to light when representatives of XtraJet showed them to several news organisations. XtraJet said that it had found two videotapes aboard one of its jets, and wanted to know whether it was legal to distribute or sell them.

The development came as doubts over the credibility of Jackson's accuser and his family began to emerge.

The family of the child has already been involved in two previous cases involving abuse

allegations. One was lawsuit in which the family said they were battered by mall security guards, and the other a divorce battle in which the father pleaded no contest to spousal abuse and child cruelty.

In November 2001, JC Penney Co. paid the boy's family \$137,500 (£80,700) to settle a suit alleging that security guards had beaten the boy, his mother and his brother in a parking lot.

The alleged incident happened after the boy had left the store carrying clothes that had not been paid for, court records show.

The mother also claimed that she had been sexually assaulted by one of the guards during the 1998 confrontation.

A month before the settlement, the boy's mother had filed for divorce, beginning a bitter fight that would include criminal charges of abuse.

The father's attorney, Russell Halpern, said the mother had lied about the abuse and had a "Svengali-like" ability to make her children repeat her lies.

Mr Halpern said that the father had once shown him a script his wife had allegedly written for their children to use when they were questioned in a civil deposition.

He said: "She wrote out all their testimony. I actually saw the script. I remember my client showing me, bringing the paperwork to me."

The Associated Press news agency said that the child's mother could not be contacted, while lawyers for JC Penney did not immediately return a call seeking comment.

Jackson's spokesman, Stuart Backerman, declined to comment about past lawsuits involving the accuser's family.

Jackson was released on \$3m bail after his surrender last Thursday, and immediately returned to Las Vegas, where he had been filming a video.

Santa Barbara County authorities yesterday said that that they expected to file formal charges sometime in mid-December.

Since you're here ...

... joining us from India, we have a small favour to ask. You've read [5 articles](#) in the last year. And you're not alone; millions are flocking to the Guardian for open, independent, quality news every day, and readers in 180 countries around the world now support us financially.

We believe everyone deserves access to information that's grounded in science and truth, and analysis rooted in authority and integrity. That's why we made a different choice: to keep our reporting open for all readers, regardless of where they live or what they can afford to pay. This means more people can be better informed, and inspired to

take meaningful action.

In these perilous times, an independent, truth-seeking global news organisation like the Guardian is essential. We have no shareholders or billionaire owner, meaning our journalism is free from commercial and political bias - this makes us different to many others. We can investigate and report without fear or favour.

Amid the various crises of 2020, we recognise the climate crisis as the defining emergency of our lifetimes. We're determined to uphold our reputation for producing powerful, high-impact environmental journalism that reflects the urgency of the crisis. And when it's never been more pertinent, our independence means we can scrutinise, challenge and expose those in power on their climate policies and decisions.

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Support us

Read our pledge

EXHIBIT M

MARK GERAGOS STATEMENT NOVEMBER 25TH, 2003.

[00:00:39.24] Hi, my name is Mark Geragos, I got with me Matthew Geragos and Brian Kabateck. We called this press conference today. Yesterday it came out, it was publicly reported that there had been some video cameras that were installed on the jet that was chartered by my client Michael Jackson's company. And that took us back and forth from another location to Santa Barbara. It was disclosed that those two video cameras, which also apparently had audio on them, were surreptitiously placed in there, were recording attorney-client conversations, and then somebody had the unmitigated goal to shop those tapes around the media outlets, in order to sell them to the highest bidder.

[00:01:26.02] In response to that, this morning, Mr Kabateck and Matthew went into a Los Angeles courtroom downtown, Judge David Yaffe's courtroom and obtained a temporary restraining order against that company: Xtrajet. That temporary restraining order prohibits them from doing anything with that tape, with that confidential attorney client communication, and they cannot show it to anybody, they cannot duplicate and not sell it. That also, they have been restrained from doing anything with that airplane at this point, until we have a chance to inspect it, and get to the bottom of exactly who did what we believe is not only a violation of federal criminal law, state, the state penal code, and an assortment of California causes of action. We've also filed suit this morning against the airline company and we reserve the right to file suit against anyone and everyone who is remotely connected to this, what I think is one of the most outrageous acts that I've ever seen in my twenty years of practicing criminal law.

[00:02:33.12] The press conference today is not gonna be questions and answers. I have besides that and announcing that, because we've been inundated with enquiries about this tape at the office. I also want to make one another statement and make it unequivocally clear: Michael Jackson is not going to be abused, Michael Jackson is not going to be slammed, is not going to be a piñata for every person who has a financial motive, or every person who thinks that they can get, as the lawyers for the chartered company said today: "We had a lottery ticket, and we thought we were gonna do something with it." This is not the lottery, this is this man's life, this is his family's life, these are scurrilous accusations. We are going to - and I have been given full authority - we will land on you like a ton of bricks, we will land on you like a hammer, if you do anything to besmirch this man's reputation, anything to intrude on his privacy, in any way that's actionable, we will unleash a legal torrent like you've never seen.

[00:03:38.12] We have, I believe, we'll put Xtrajet out of business, for this outrageous act. Anybody who is connected with it. We will put and seek to do everything else to put them out of business. Michael Jackson is no longer going to be somebody who is on the receiving end of every scurrilous accusation none to man. There are people out there speaking who claim to know Michael Jackson, who claim to have worked for Michael Jackson, who have never laid eyes on him. The press puts them on, without ... unblinkingly. That is not going to go on anymore. We will demand that any outlet, that any

person who comes out, shows their bona fides, before they're allowed to just repeat these scurrilous actions and we will meet any accusation that is made with every legal avenue and we will not sit back and allow him to be abused. And that's what's actually what's going on here. If anybody doesn't think based upon what's happened so far, that the true motivation of these charges and these allegations is anything but money and the seeking of money then they're living in their own Neverland. Thank you.

EXHIBIT N

'Leaving Neverland' director explains why he didn't interview Macaulay Culkin for his brutal Michael Jackson documentary

Jason GuerrasioMar 4, 2019, 08:29 IST



Epic

Macaulay Culkin with Michael Jackson in the music video "Black or White."

- "Leaving Neverland" director Dan Reed talked to Business Insider about the decision to not attempt to interview Macaulay Culkin about his friendship with Michael Jackson as a boy in the 1990s.
- In the documentary, Culkin and another boy, Brett Barnes, are portrayed as getting attention from Jackson when he distances himself from the film's two main subjects, Wade Robson and James Safechuck, who in the movie claim they had sexual relationships with Jackson as boys.
- The movie says Culkin and Barnes "categorically deny any sexual contact with Michael Jackson."
- "I'm not in the business of outing anyone," Reed told Business Insider about not contacting Culkin or Barnes.
- Macaulay Culkin's representative declined to comment for this story.

At the conclusion of part one of "Leaving Neverland" - the two-part HBO documentary that focuses on two men, Wade Robson and James Safechuck, who allege Michael Jackson sexually abused them when they were boys during the 1980s and 1990s - director Dan Reed shows a rift in Jackson's relationship with the boys as child star Macaulay Culkin, and another child, Brett Barnes, enter the pop star's world. Advertisement

Robson says in the movie that he first became familiar with Culkin while on the set of the music video for Jackson's 1991 song, "Black or White." The epic music video features Culkin as a rambunctious kid playing his music too loud to the disgust of his father (played by George Wendt). Culkin later shows up in the video with Jackson lip-syncing rap lyrics.

Robson, an Australian native, says he began a sexual relationship with Jackson after winning a dance contest to meet the megastar. At the time of the "Black or White" video shoot, Robson had moved to the US.

"Macaulay was where I was in my previous trips, right by Michael's side every moment," Robson said in "Leaving Neverland." "Now I was kind of on the sideline as far as being Michael's friend and being his favorite and that was really confusing."

Advertisement

Following the music video shoot, Robson's time with Jackson became limited. In the doc, Robson's mother says Jackson would tell her son he would call him, and Wade would wait by the phone after school but Jackson would never call. She began to notice a pattern.



Kevin Kane/WireImage/Getty

(L-R) Macaulay Culkin with Michael Jackson at the 30th anniversary concert celebrating Jackson's solo career in 2001.

"Every 12 months there was a new boy in his life," she says. Safechuck, who says Jackson began to sexually abuse him after they starred in a Pepsi commercial together, noticed Jackson hanging out with Barnes around the same time. Safechuck says in the doc that Jackson told him he couldn't go on tour for the album "Dangerous" because Jackson wasn't allowed to bring kids. But Safechuck then saw Barnes with Jackson in news reports about the tour. Advertisement

Read more: [Inside the making of the 4-hour HBO Michael Jackson documentary, "Leaving Neverland," which contains harrowing allegations of child sexual abuse](#)

"You're no longer special," Safechuck says in the movie about how he felt after realizing Jackson was focused on someone else.

The movie says that Culkin and Barnes "categorically deny any sexual contact with Michael Jackson." (Macaulay Culkin's representative declined to comment for this story.) Advertisement

But did Reed ever consider trying to interview Culkin or Barnes for the movie to get their perspectives on being with Jackson at that time?

"I gave it some serious thought," Reed told Business Insider. "In the end I knew that Macaulay and Brett had made statements consistently rebutting allegations that were made. I'm not in the business of outing anyone. I think we make it very clear in the film that they deny to this day that anything sexual happened and I'm not about to try to change their minds about that."

But did Reed consider their perspective might have changed recently? Advertisement

"I don't want to push Macaulay or Brett to admit anything they don't want to admit, or confront anything they don't want to confront right now," he said. "If at any point Wade said, 'Yeah, Macaulay was in the corner of the bedroom when Michael did X or Y with me,' of course I would have gone to Macaulay and asked if he remembered that. That would have been vital. But that didn't happen. At no point was Macaulay or Brett or any other little boy an eyewitness to acts of child sexual molestation other than Wade or James."

Barnes, Culkin, and Robson were witnesses for Jackson at his [child-molestation trial](#) in 2005, in which Jackson was acquitted (the singer denied molesting anyone throughout his life). Culkin was seen beside Jackson at the 30th anniversary concert event celebrating Jackson's solo career in 2001 at New York's Madison Square Garden.

Part 2 of "Leaving Neverland" airs on HBO on Monday. Advertisement
