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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

WADE ROBSON, an individual,

Plaintiff

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 the Hon. Mark A. Young, Department M (Santa Monica)

DEFENDANTS' REPLY BRIEF IN SUPPORT OF THEIR MOTION FOR SUMMARY JUDGMENT OR SUMMARY ADJUDICATION OF ISSUES

[*Evidentiary Objections to Cunny Declaration filed concurrently herewith*]

Date: February 24, 2021
Time: 8:30 a.m.
Dept.: M

Action Filed: May 10, 2013
Trial Date: June 14, 2021

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I. INTRODUCTION

On October 20, 2020, the Court sustained a demurrer in a related action against these same defendants, *Safechuck v. MJJ Productions, et al.*, Case No. BC 545264. The logic of the Court's ruling on the demurrer in the *Safechuck* case fully applies here. For the same reasons that the *Safechuck* case failed as a matter of law on demurrer, the Robson case fails as a matter of law on summary judgment. Moreover, Robson's claims all fail for another, independent reason: Faced with the undisputed facts and evidence here, no reasonable juror could conclude that any allegedly tortious acts or omissions of the Corporations were the legal cause of the supposed molestation.

II. ARGUMENT

Plaintiff characterizes summary judgment as a "drastic measure," barred where there is even a "germ of a potential cause of action." Opp. at 9-10. As the California Supreme Court recently reaffirmed, however, the decades-old cases cited by Plaintiff—which were decided before the 1992 and 1993 amendments to Section 437c—are from a bygone era when "summary judgment was more disfavored than it is today." *Perry v. Bakewell Hawthorne, LLC*, 2 Cal.5th 536, 542 (2017). "Summary judgment is now seen as a particularly suitable means to test the sufficiency of the plaintiff's or defendant's case." *Ibid.* (internal citations/punctuation omitted).

A. The Negligence Claims Fail Because Plaintiff Cannot Show the Requisite Special Relationship and Control to Support a Duty of Care.

Whether the Corporations had a legal duty to protect Plaintiff is a legal inquiry for the Court's determination. As a general rule, there is no negligence liability for failure to protect unless a "special relationship" gives rise to a legal duty based on the defendant's ability to control the person who caused the harm. *See Eric J. v. Betty M.*, 76 Cal.App.4th 715, 727 (1999). Here, there is no special relationship, or corresponding duty, because the Corporations had no ability to control Jackson—their sole shareholder (UF 7, 9). Accordingly, all four negligence claims fail.

1. There is No Evidence that the Corporations Could Control Jackson.

Robson attempts to create a triable issue of material fact by arguing that other directors or employees of the Corporations could have exercised control over Jackson. The Court already rejected these arguments in ruling on the Corporations' prior summary judgment motion. *See*

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Court's December 19, 2017 Ruling at 10 (finding Robson's evidence "insufficient to demonstrate a material fact in dispute as to the issue of control"). They fare no better the second time around.

(a) The Expanded Board in June 1994.

Robson points out that in the middle of 1994 (years after Robson entered Jackson's life and the abuse allegedly began), Jackson expanded the Corporations' Boards of Directors. Opp. at 1:23-2:20. *See* UF 46-47, 51-52. This evidence does not raise a material issue of fact as to whether the Board could control Jackson. As Mr. Branca explains, the members of the Board all served at the pleasure of Jackson himself. UF 48, 53 (Branca Decl. ¶¶ 12, 18). Robson contends that Mr. Branca's reference to serving "at the pleasure of" Jackson is vague and inconsistent with the Corporations' bylaws. UF 48, 53. Robson is wrong. There is nothing vague about Mr. Branca's declaration, and the Corporations Code itself explains that *all* Board members of *all* corporations serve at the pleasure of the shareholders, as directors may be elected "by unanimous written consent of all shares" (Corp. Code § 603(d)), and "[a]ny or all of the directors may be removed without cause if the removal is approved by the outstanding shares" (*id.* § 303(a)). Even after Jackson expanded the Boards, if they acted in any way inconsistent with Jackson's wishes, he could simply remove the other members and rescind their actions as the sole remaining director.

Furthermore, whatever powers the Boards held over the Corporations, they were *not* empowered to run Jackson's entire life. It is undisputed that the Corporations did not *own* Jackson's residences. UF 10-11. And although Robson attempts to dispute the fact that the Corporations could not tell Jackson what he could do at his own homes, the "evidence" he cites about the power of the Boards says nothing about Jackson's homes and is not responsive to the evidence cited by the Corporations. *See* UF 12. Indeed, this is common sense. If the other Board members showed up at Jackson's home and tried to control him, he could have them removed from the premises as trespassers (and, as sole shareholder, removed from the Board).

(b) The Corporations' "Managing Agents."

Robson also claims that Norma Staikos and Bill Bray, two employees of MJJ Productions, had some control over the Corporations. Opp. at 2:20-3:8. While it is true that they had some power to do certain things for the companies, Robson does not, and cannot, proffer any evidence

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that Ms. Staikos or Mr. Bray, or anyone else, had authority *to tell Jackson what to do*, or to impose restrictions on him. Jackson, as sole shareholder of the Corporations, had the right to ignore or fire either of them if he wanted to. Robson alleges that Ms. Staikos and Mr. Bray had authority to hire and fire employees without Jackson's knowledge or approval. Opp. 3:2-4. But this says nothing about their authority *over Jackson*. In fact, a security guard testified that after Ms. Staikos fired him without Jackson's knowledge, Jackson overruled her and hired him right back. Cunny Decl., Ex. 7 at 74:22-75:17. For the same reasons that the Board could not dictate what Jackson did (or who he could have visit him) at his own home, none of the "managing agents" of the Corporations could either. As sole shareholder, Jackson could fire Ms. Staikos, Mr. Bray, or any other employee of the Corporations. *See* Corp. Code §§ 300(a), 303(a), 603(d). And if an employee at *Jackson's home* refused to listen to him, he could fire her on the spot and have her removed from his home.

(c) Corporations Can Have a Single Shareholder.

Accepting the Corporations' arguments would not "immunize institutions that [allegedly] facilitate abuse perpetrated by their most powerful employees" or "creat[e] a backwards standard by which temporary, menial employees would incur more liability for an organization than its own principals," as Robson misleadingly claims. Opp. at 1:11-18. Companies are not vicariously liable for criminal acts of their agents and employees (regardless of their position or title) when those acts fall outside the scope of employment—and child sexual abuse is *always* outside the scope of employment. *See, e.g.*, *Quarry v. Doe I*, 53 Cal.4th 945, 962 n.4 (2012). That is precisely why Robson is not pursuing liability on a theory of *respondeat superior*. Of course, were Jackson still alive, Robson could sue him personally and go after his assets (including the Corporations) if he prevailed. It is only because Jackson is dead—*and Robson missed the deadline to file a creditor's claim*—that Robson is contorting his legal claims to try to recharacterize Jackson's *alleged* criminal conduct as the supposed "negligence" of his wholly-owned companies.

2. Plaintiff Has Not Shown Misfeasance by the Corporations.

Likely recognizing that he cannot show the requisite special relationship and ability to control, Plaintiff appears to argue that no special relationship is required because the Corporations purportedly "placed" Robson "in a situation in which [he was] exposed to an unreasonable risk of

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harm through the reasonably foreseeable conduct … of a third person [i.e., Jackson]." (Opp. 11:2-5, quoting *Lugtu v. Cal. Highway Patrol*, 26 Cal.4th 703, 716 (2001).) But *Lugtu* is a "misfeasance" case, not a "nonfeasance" case. In *Lugtu*, the Court found that by directing a driver to stop in the center median of the freeway, where the driver was later struck by a truck, the police officer *created* the peril. *Id.* at 717. No special relationship was required. *Id.* at 716.

Any argument that the Corporations created the peril here is nonsensical. The Corporations did not create Jackson, the *alleged* peril. They did not create his fame, and they did not create the "risk" that Jackson and Plaintiff would meet and become friends. Rather, Robson met Jackson after he won a dance contest sponsored by Pepsi, Target, and CBS Records (with no involvement of the Corporations). UF 14-17. Robson's family thereafter traveled to the U.S. and went to great efforts to track Jackson down. UF 19-21. Once they made contact with him, Jackson *personally* invited the Robsons to the Ranch and became friends with them. UF 22. And, notably, even in those cases where, unlike here, a third-party entity creates the opportunity for the alleged perpetrator and child to meet—e.g., in cases involving churches, schools, daycares, and the like—courts consistently analyze those cases as *nonfeasance* cases, requiring a special relationship.

3. Plaintiff's Negligence *Per Se* Theory Fails.

As part of his general negligence claim, Plaintiff attempts to assert a theory of negligence *per se* on the premise that the Corporations were somehow "mandated reporters" under CANRA. This theory fails for several reasons. First and foremost, the Corporations were not mandated reporters. Indeed, Plaintiff does not even attempt to identify *who* at the Corporations was supposedly a "mandated reporter" or which of the categories of employees that were "mandated reporters" under the version of the statute in effect at the time purportedly applies here. *See* Opp. at 17:6-20. Nor can he. Even Plaintiff contends that the Corporations were formed "to furnish Jackson's services as a recording artist, as well as manage his personal affairs." PMF 1. *See* UF 45, 50. Unsurprisingly, "celebrity loan-out company" has never appeared on CANRA's list of "mandated reporters." Cal. Penal Code § 11165.7. Moreover, negligence *per se*, does not create an independent right of action, and does not create a new duty where one does not otherwise exist. *See Rice v. Ctr. Point, Inc.*, 154 Cal.App.4th 949, 958 (2007) ("The negligence per se presumption

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… concerns the *standard* of care, rather than the *duty* of care.'"); *Quiroz v. Seventh Ave. Ctr.*, 140 Cal.App.4th 1256, 1285 (2006) ("[T]o apply negligence per se is not to state an independent cause of action. The doctrine does not provide a private right of action for violation of a statute."). In the absence of a special relationship and requisite ability to control, the "no duty to aid" rule still applies—even in the context of alleged child sexual abuse. *Eric J.*, 76 Cal.App.4th at 727-30.

4. The Negligent Supervision and Retention/Hiring Claims Fail.

The opposition brief's section on negligent hiring and retention never explains how the Corporations "hired" or "retained" Jackson. Opp. 17:21-18:14. There is no explanation: Plaintiff acknowledges that the Corporations were created to manage Jackson's business affairs (PMF 1; UF 45, 50) and that Jackson was the sole shareholder of both entities (UF 7, 9). Plaintiff is essentially claiming that a person *who suspects* that *he himself* may have criminal tendencies has a negligence-based duty not to allow himself to work at his own companies. This would effectively preclude classes of people from creating their own corporations at all. If denying such persons these privileges is even permissible under the State and Federal Constitutions, the decision should be made by the Legislature and not be created out of whole cloth as a principle of negligence law.

Plaintiff's arguments regarding negligent supervision fare no better. Opp. 12:10-20. As with negligent hiring/retention, Plaintiff never explains how the Corporations could "supervise" Jackson—their sole shareholder. What Plaintiff is really alleging is that Jackson negligently supervised *himself* given that he was supposedly on notice of his own dangerousness. Opp. 12:15-16. But under that theory, *any* intentional tort could be re-characterized as "negligent supervision" of oneself, and the line between negligence and willful misconduct would be destroyed. Every child molestation could be pleaded as a molester's negligent supervision of himself, rendering meaningless the holding of our Supreme Court that "[t]here is no such thing as negligent or even reckless sexual molestation." *J. C. Penney Cas. Ins. Co. v. M. K.*, 52 Cal.3d 1009, 1021 (1991).

5. The Negligent Failure to Train, Warn, or Educate Claim Fails.

Plaintiff does not even attempt to explain why a youth sports organization, where children "develop their athletic skills and … learn sportsmanship" is "not designed to educate children, their parents, and others regarding the risk of sexual abuse"—as the Court of Appeal held in *Doe*

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v. U.S. Youth Soccer Assoc., 8 Cal.App.5th 1118, 1138 (2017)—but corporations established to manage a musician's business affairs *are* designed to do that.[1] Instead, confronted with the public policy concerns that would arise if low-level employees had to warn third parties about the suspected predilections of their boss, Plaintiff repeats his unsupported assertion that the Corporations were "mandated reporters" under CANRA and argues that whistleblower protections would insulate the employees from liability. Opp. at 18:24-19:9. There are several problems with this argument. First, as explained in Section II.B.3, the Corporations are not, and have never been, "mandated reporters." Second, the statutory whistleblower protections Robson references only immunize *reports to governmental agencies*. *See* Penal Code § 11172; Labor Code § 1102.5; Civ. Code § 47. An employee warning a third-party (like Robson or his mom) of the suspected criminal conduct of her boss would not be insulated from civil suit if the accusation proved unfounded.

Moreover, Robson fails to present evidence that the Corporations had any more knowledge than Plaintiff and his mother regarding the *alleged* risks posed by Jackson. UF 33-42. Even if the Corporations had been in a special relationship with Robson (and they were not), in order for there to be a duty to warn, there must be something to warn about. There can be no duty for the Corporations to warn Joy Robson that her son was sleeping in Jackson's bed, for example, when Joy was the one who permitted her son to sleep there in the first place. UF 33, 42.

Finally, any suggestion that California law imposes a *general* duty to warn others about "known" dangers of child sexual abuse (even absent a special relationship and ability to control) is contrary to longstanding case law. *See Conti v. Watchtower Bible & Trade Society of New York, Inc.*, 235 Cal.App.4th 1214, 1226 (2015) (no duty to warn congregation about known pedophile); *Eric J.*, 76 Cal.App.4th at 719, 727-30 (family members of convicted pedophile had no duty to

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[1] The two cases cited by Plaintiff have no application here. *Tarasoff v. Regents of Univ. of Cal.*, 17 Cal.3d 425 (1976) involved a therapist-patient relationship. Not only are the facts of that case inapplicable, but its "expansive" ruling has since been superseded by Civil Code § 43.92, limiting a therapist's duty to warn. *See Regents of Univ. of Cal. v. Superior Court*, 29 Cal.App.5th 890, 903-04 (2018). Plaintiff's reliance on *Phyllis P. v. Superior Court*, 183 Cal.App.3d 1193 (1986) is similarly misplaced. That case concerned a school-student relationship—a well-accepted "special relationship" where the school clearly stands *in loco parentis* and is well-suited to train, warn, and educate. *Id.* at 1196. The same clearly cannot be said of celebrity loan-out companies.

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warn pedophile's girlfriend or her minor son of possible harm when hosting them at their home). Robson does not, and cannot, cite any cases that hold otherwise.

B. The Breach of Fiduciary Claim Fails.

Plaintiff does not meaningfully defend his claim for breach of fiduciary duty. The *only* case cited by Plaintiff is one involving an attorney and client, a paradigm example of a fiduciary relationship. *Barbara A. v. John G.*, 145 Cal.App.3d 369, 383 (1983). His claim that the Corporations stood *in loco parentis* is wrong and, in any event, would at best create a negligence-based duty. Likewise, his claim that he was an employee is irrelevant as this does not create a fiduciary relationship. *O'Byrne v. Santa Monica-UCLA Med. Ctr.*, 94 Cal.App.4th 797, 811 (2001). Plaintiff does not even attempt to argue otherwise. Moreover, even if Plaintiff could demonstrate a triable issue of fact as to whether he was in a "confidential relationship" with *Jackson personally* (and he cannot), there is no evidence of a "confidential relationship" with the companies that handled Jackson's business affairs. The Robsons' friendship with Jackson began and grew independently from the Corporations. UF 13-23, 31-34, 43. And the reason Joy was not worried about her son sleeping in Jackson's bed, and why she always believed in his innocence, was because she *trusted Jackson personally*. UF 31-34. It had nothing to do with the Corporations. Joy knew little about the Corporations—only that they were Jackson's companies, and "some of the things that Michael did went through Ventures, and some went through Productions." UF 43.

C. The Intentional Infliction of Emotional Distress Claim Fails.

Robson abandons his nonsensical allegations that the Corporations' purported "extreme and outrageous conduct" was "putting [Jackson] in positions of authority" and being "incapable of supervising" Jackson to prevent the alleged abuse. FAC ¶¶ 88-89. Instead, Robson appears to argue that the Corporation' purported "outrageous" conduct was "procuring" children for Jackson for the purpose of abuse. Opp. at 19:24-20:2. There are several problems with this argument. First, to the extent the "outrageous" conduct was the alleged procurement or abuse itself, such conduct falls outside the scope of employment, and the Corporations cannot be held directly or vicariously liable under Section 340.1(a)(1) or *respondeat superior*. *See* Mot. at 27:6-20. Second, notwithstanding his outlandish allegations, Robson presents no actual evidence that anyone at the

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Corporations "procured" children generally or "procured" Robson specifically. Rather, the evidence shows that Plaintiff met Jackson through a dance contest in Australia, and his family doggedly pursued a relationship with Jackson thereafter—showing up at his hotel, sending letters, and tracking him down when they came to the U.S. UF 13-21. Jackson then personally invited the Robsons to his home, where Plaintiff *alleges* he was first molested. UF 22-23. Any alleged involvement of the Corporations (e.g., arranging travel, sending gifts, or sponsoring immigration) was incidental to the already existing personal relationship between the Robsons and Jackson. And, obviously, simply providing services like booking travel, sending gifts, or assisting with immigration paperwork at one's boss's request is not "extreme" or "outrageous" conduct.

D. All of Plaintiffs Claims Fail Because Robson Cannot Prove Causation.[2]

In addition to establishing a duty of care or "outrageous" conduct, Robson must prove that the Corporations' purportedly tortious conduct was a legal cause of the *alleged* abuse to prevail on any of his claims. He cannot do so. Indeed, Robson cannot answer the fundamental question: What could Jackson's wholly-owned companies have done *to actually prevent the alleged abuse*? Instead, Robson simply reiterates his accusations that the Corporations: (1) failed to report Jackson or warn Plaintiff about him; (2) failed to fire or supervise Jackson; and (3) failed to prevent Plaintiff from spending time with Jackson. Opp. at 15:20-22. But Robson does not explain *how the outcome would have been any different* if the Corporations attempted to take any of these proposed actions. Rather, the undisputed evidence shows that the Corporations had *nothing* to do with the chain of events that led to the alleged abuse, and no reasonable juror could conclude otherwise. In such cases, causation is a question of law, and summary adjudication of the claims is appropriate. *State Hospitals v. Superior Court*, 61 Cal.4th 339, 353 (2015).

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[2] Robson argues that the Corporations somehow waived their right to argue that the Corporations' conduct was not the legal cause of the abuse while the case was pending on appeal. *See* Opp. at 15 n.2. That is absurd. On the Corporations' prior motion for summary judgment, the Court dismissed Robson's claims on statute of limitations grounds because Section 340.1 required Robson's claims to be filed by his 26th birthday unless a narrow exception applied. Because the Court found that the Corporations had no ability to control Jackson, the Court ruled the exception did not apply. Section 340.1 was then amended while the case was pending on appeal, mooting that argument. But an acknowledgement that the statutory basis on which the trial court had ruled no longer applied does not somehow waive arguments (like causation) that had not yet been made.

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1. Alleged Failure to Report Jackson or Warn Plaintiff.

Robson claims that the *alleged* abuse continued until approximately 1996. PMF 70. But the undisputed evidence shows that the police investigated Jackson in 1993 when allegations were made that Jackson had molested a boy. UF 35. During that investigation, police twice came to the Robson's house to question Robson and his mother. *Ibid.* Plaintiff adamantly denied that Jackson had done anything improper, and his mother believed him. UF 34, 37. In fact, when Joy Robson was called before a grand jury in 1994, she testified that her faith in Jackson's innocence was so unwavering that even if witnesses claimed they saw her son being molested, or claimed there were naked photographs of her son, she would not believe them. UF 36, 38-39. *See also* UF 40-42. Indeed, Joy knew that a former maid claimed that she saw Jackson showering with Robson. UF 41. Joy discussed those allegations with her son, but she did not believe them. *Ibid.* Joy continued to allow Robson to spend time with Jackson, and sleep in his bed, even after the allegations were made. UF 34, 41-42. Given these undisputed facts, no reasonable juror could find that any purported failure to report Jackson to the police was a legal cause of the alleged abuse.[3]

Pipitone v. Williams, 244 Cal.App.4th 1437 (2016) is instructive. That case arose from the gruesome murder of a wife by her abusive husband. *Id.* at 1439. Six weeks before the murder, the husband drove his truck over the wife's foot, and she was treated by two physicians (one was the husband's father). *Id.* at 1440-42. The wife's mother filed a wrongful death suit, claiming the doctors' failure to report the spousal abuse was negligent and violated the doctors' reporting obligations under Penal Code § 11160. *Id.* at 1142. The trial court granted summary judgment for the defendants on both duty and causation. The Court of Appeal affirmed, explaining that because others had reported the abusive husband to the police, a police officer had interviewed the wife, and the department had taken no actions that prevented the murder, there was no evidence to suggest that the outcome would have been any different if the *defendants* reported the abuse. *Id.* at

[3] This evidence does not simply raise an issue of comparative negligence. The causal nexus between reporting someone and prevention of future crimes is already tenuous at best because the chain of causation includes discretionary determinations and actions by others. *State Hospitals*, 61 Cal.4th at 353. Here, there is no need to speculate whether reporting Jackson would change the outcome because Jackson *was* reported and investigated. Yet, Robson alleges the abuse continued.

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1460. The same analysis applies equally here with respect to Plaintiff's claims for negligence and negligent failure to train, warn, or educate. Even if the Corporations were "mandated reporters" (and they were not), or had an affirmative duty to warn Robson about Jackson (and they did not), Robson has presented no evidence to suggest that the outcome would have been any different if the Corporations somehow reported Jackson or warned Robson about him.

2. Alleged Failure to Fire or Supervise Jackson.

As explained in Sections II.A.1 and II.A.4, the Corporations did not hire Jackson (their founder and sole shareholder) and had no ability to "fire" or "supervise" him as a matter of law. Because any efforts to "fire" or "supervise" Jackson would have been futile, the Corporations' failure to do so cannot be a legal cause of the alleged abuse. Moreover, the undisputed evidence shows that Plaintiff was not exposed to Jackson through the Corporations. UF 13-33, 43. As such, even if Jackson were somehow "fired" from his own companies, or if the Corporations ceased to exist (since without Jackson there would be no Corporations), it would have made no difference. The Robsons still would have met and pursued a friendship with Jackson—the famed entertainer.

3. Alleged Failure to Keep Robson Away from Jackson.

Finally, Plaintiff contends that the Corporations were a legal cause of the alleged abuse because they purportedly "facilitated Jackson's secluded contact with the Plaintiff," by answering phones, arranging travel, providing security, etc. Opp. at 15:20-24. For the same reasons the Corporations had no ability to "supervise" Jackson, they had no ability to stop Jackson from spending time with Robson or his family either, particularly at his home. Even assuming an employee of the Corporations had reason to believe that Jackson was abusing Robson, if the employee refused to provide transport, cleaning, security, or other basic services, Jackson could simply fire and replace the insubordinate employee. In any case, provision of these routine services is far too remote from the alleged abuse to be its "proximate" cause. *See Shih v. Starbucks Corp.*, 53 Cal.App.5th 1063, 1071 (2020) (events leading to spilled hot tea too remote from alleged cup defects); *Wawanesa Mut. Ins. Co. v. Matlock*, 60 Cal.App.4th 583, 588-89 (1998) (illegally giving minor cigarettes too attenuated from fire to be a proximate cause). The requisite causal nexus between the purportedly tortious conduct and the alleged abuse is simply not there.

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DATED: February 19, 2021

Respectfully Submitted:

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Los Angeles, State of California. My business address is 808 Wilshire Boulevard, 3rd Floor, Santa Monica, CA 90401.

On February 19, 2021, I served true copies of the following document(s) described as **DEFENDANTS' REPLY BRIEF IN SUPPORT OF THEIR MOTION FOR SUMMARY JUDGMENT OR SUMMARY ADJUDICATION OF ISSUES** on the interested parties in this action as follows:

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☐ **BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed above and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with Kinsella Weitzman Iser Kump LLP's practice for collecting and processing correspondence for mailing. On the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on February 19, 2021, at Los Angeles, California.

/s/ Michelle Law

Michelle Law

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