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| <p>ATTORNEY OR PARTY WITHOUT ATTORNEY (<i>Name, State Bar number, and address</i>):</p> <p>Thomas A. Mesereau (SBN 91182) MESEREAU LAW GROUP, APC 1901 Avenue of the Stars, Suite 200, Los Angeles, CA 90067</p> <p>TELEPHONE NO.: (310) 651-9960 FAX NO. (<i>Optional</i>):</p> <p>E-MAIL ADDRESS (<i>Optional</i>): mesereau@mesereaulaw.com</p> <p>ATTORNEY FOR (<i>Name</i>): Defendants MJJ Productions, Inc. and MJJ Ventures, Inc.</p> | <p>FOR COURT USE ONLY</p> <p>Electronically FILED by Superior Court of California, County of Los Angeles 2/27/2024 5:19 PM David W. Slayton, Executive Officer/Clerk of Court, By K. Parenteau, Deputy Clerk</p> |
| <p>SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES</p> <p>STREET ADDRESS: 9355 Burton Way MAILING ADDRESS: 9355 Burton Way CITY AND ZIP CODE: Beverly Hills, CA 90210 BRANCH NAME: Beverly Hills Courthouse</p> | |
| <p>PLAINTIFF/PETITIONER: Wade Robson DEFENDANT/RESPONDENT: MJJ Productions, et al.</p> | |
| <p>CASE MANAGEMENT STATEMENT</p> <p>(<i>Check one</i>): <input checked="" type="checkbox"/> UNLIMITED CASE <input type="checkbox"/> LIMITED CASE (Amount demanded exceeds \$25,000) (Amount demanded is \$25,000 or less)</p> | |
| <p>CASE NUMBER: BC508502</p> <p>A CASE MANAGEMENT CONFERENCE is scheduled as follows: Date: February 28, 2024 Time: 8:30 a.m. Dept.: 207 Div.: Room: Address of court (<i>if different from the address above</i>):</p> <p><input type="checkbox"/> Notice of Intent to Appear by Telephone, by (<i>name</i>):</p> | |

INSTRUCTIONS: All applicable boxes must be checked, and the specified information must be provided.

1. Party or parties (*answer one*):

- a. This statement is submitted by party (*name*):
- b. This statement is submitted **jointly** by parties (*names*): Defendants MJJ Productions, Inc.; MJJ Ventures, Inc.

2. Complaint and cross-complaint (*to be answered by plaintiffs and cross-complainants only*)

- a. The complaint was filed on (*date*): May 10, 2013
- b. The cross-complaint, if any, was filed on (*date*):

3. Service (*to be answered by plaintiffs and cross-complainants only*)

- a. All parties named in the complaint and cross-complaint have been served, have appeared, or have been dismissed.
- b. The following parties named in the complaint or cross-complaint
 - (1) have not been served (*specify names and explain why not*):
 - (2) have been served but have not appeared and have not been dismissed (*specify names*):
 - (3) have had a default entered against them (*specify names*):
- c. The following additional parties may be added (*specify names, nature of involvement in case, and date by which they may be served*):

4. Description of case

- a. Type of case in complaint cross-complaint (*Describe, including causes of action*):
 Plaintiff’s Fourth Amended Complaint brings claims for: 1) Intentional Infliction of Emotional Distress; 2) Negligence; 3) Negligent Supervision; 4) Negligent Retention/Hiring; 5) Negligent Failure to Warn, Train, or Educate; and 6) Breach of Fiduciary Duty.

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| PLAINTIFF/PETITIONER: Wade Robson | CASE NUMBER: |
| DEFENDANT/RESPONDENT: MJJ Productions, et al. | BC508502 |

4. b. Provide a brief statement of the case, including any damages. *(If personal injury damages are sought, specify the injury and damages claimed, including medical expenses to date [indicate source and amount], estimated future medical expenses, lost earnings to date, and estimated future lost earnings. If equitable relief is sought, describe the nature of the relief.)*
 Please see Attachment 4b.

(If more space is needed, check this box and attach a page designated as Attachment 4b.)

5. **Jury or nonjury trial**

The party or parties request a jury trial a nonjury trial. *(If more than one party, provide the name of each party requesting a jury trial):*
 Defendants MJJ Productions, Inc.; MJJ Ventures, Inc.

6. **Trial date**

a. The trial has been set for *(date)*:
 b. No trial date has been set. This case will be ready for trial within 12 months of the date of the filing of the complaint *(if not, explain)*:
 Please see Attachment 6b for explanation of why setting a trial date now is impractical.
 c. Dates on which parties or attorneys will not be available for trial *(specify dates and explain reasons for unavailability)*:

7. **Estimated length of trial**

The party or parties estimate that the trial will take *(check one)*:
 a. days *(specify number)*: Please see Attachment 7
 b. hours (short causes) *(specify)*:

8. **Trial representation (to be answered for each party)**

The party or parties will be represented at trial by the attorney or party listed in the caption by the following:
 a. Attorney: Jennifer L. Keller (SBN 84412)
 b. Firm: KELLER/ANDERLE LLP
 c. Address: 18300 Von Karman Avenue, Suite 930, Irvine, CA 92612
 d. Telephone number: (949) 476-8700
 e. E-mail address: jkeller@kelleranderle.com
 f. Fax number: (949) 476-0900
 g. Party represented: Defendants
 Additional representation is described in Attachment 8.

9. **Preference**

This case is entitled to preference *(specify code section)*:

10. **Alternative dispute resolution (ADR)**

a. **ADR information package.** Please note that different ADR processes are available in different courts and communities; read the ADR information package provided by the court under rule 3.221 for information about the processes available through the court and community programs in this case.
 (1) For parties represented by counsel: Counsel has has not provided the ADR information package identified in rule 3.221 to the client and reviewed ADR options with the client.
 (2) For self-represented parties: Party has has not reviewed the ADR information package identified in rule 3.221.
 b. **Referral to judicial arbitration or civil action mediation (if available).**
 (1) This matter is subject to mandatory judicial arbitration under Code of Civil Procedure section 1141.11 or to civil action mediation under Code of Civil Procedure section 1775.3 because the amount in controversy does not exceed the statutory limit.
 (2) Plaintiff elects to refer this case to judicial arbitration and agrees to limit recovery to the amount specified in Code of Civil Procedure section 1141.11.
 (3) This case is exempt from judicial arbitration under rule 3.811 of the California Rules of Court or from civil action mediation under Code of Civil Procedure section 1775 et seq. *(specify exemption)*:

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| PLAINTIFF/PETITIONER: Wade Robson DEFENDANT/RESPONDENT: MJJ Productions, et al. | CASE NUMBER: BC508502 |
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10. c. Indicate the ADR process or processes that the party or parties are willing to participate in, have agreed to participate in, or have already participated in (*check all that apply and provide the specified information*):

| | The party or parties completing this form are willing to participate in the following ADR processes (<i>check all that apply</i>): | If the party or parties completing this form in the case have agreed to participate in or have already completed an ADR process or processes, indicate the status of the processes (<i>attach a copy of the parties' ADR stipulation</i>): |
|-------------------------------------|---|--|
| (1) Mediation | <input type="checkbox"/> | <input type="checkbox"/> Mediation session not yet scheduled <input type="checkbox"/> Mediation session scheduled for (<i>date</i>): <input type="checkbox"/> Agreed to complete mediation by (<i>date</i>): <input type="checkbox"/> Mediation completed on (<i>date</i>): |
| (2) Settlement conference | <input type="checkbox"/> | <input type="checkbox"/> Settlement conference not yet scheduled <input type="checkbox"/> Settlement conference scheduled for (<i>date</i>): <input type="checkbox"/> Agreed to complete settlement conference by (<i>date</i>): <input type="checkbox"/> Settlement conference completed on (<i>date</i>): |
| (3) Neutral evaluation | <input type="checkbox"/> | <input type="checkbox"/> Neutral evaluation not yet scheduled <input type="checkbox"/> Neutral evaluation scheduled for (<i>date</i>): <input type="checkbox"/> Agreed to complete neutral evaluation by (<i>date</i>): <input type="checkbox"/> Neutral evaluation completed on (<i>date</i>): |
| (4) Nonbinding judicial arbitration | <input type="checkbox"/> | <input type="checkbox"/> Judicial arbitration not yet scheduled <input type="checkbox"/> Judicial arbitration scheduled for (<i>date</i>): <input type="checkbox"/> Agreed to complete judicial arbitration by (<i>date</i>): <input type="checkbox"/> Judicial arbitration completed on (<i>date</i>): |
| (5) Binding private arbitration | <input type="checkbox"/> | <input type="checkbox"/> Private arbitration not yet scheduled <input type="checkbox"/> Private arbitration scheduled for (<i>date</i>): <input type="checkbox"/> Agreed to complete private arbitration by (<i>date</i>): <input type="checkbox"/> Private arbitration completed on (<i>date</i>): |
| (6) Other (<i>specify</i>): | <input type="checkbox"/> | <input type="checkbox"/> ADR session not yet scheduled <input type="checkbox"/> ADR session scheduled for (<i>date</i>): <input type="checkbox"/> Agreed to complete ADR session by (<i>date</i>): <input type="checkbox"/> ADR completed on (<i>date</i>): |

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| PLAINTIFF/PETITIONER: Wade Robson DEFENDANT/RESPONDENT: MJJ Productions, et al. | CASE NUMBER: BC508502 |
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11. Insurance

- a. Insurance carrier, if any, for party filing this statement (*name*): Multiple policies; documents produced to Plaintiff.
- b. Reservation of rights: Yes No
- c. Coverage issues will significantly affect resolution of this case (*explain*):

12. Jurisdiction

Indicate any matters that may affect the court's jurisdiction or processing of this case and describe the status.

Bankruptcy Other (*specify*):

Status:

13. Related cases, consolidation, and coordination

- a. There are companion, underlying, or related cases.
 - (1) Name of case: James Safechuck v. MJJ Productions, Inc., et al.,
 - (2) Name of court: Los Angeles Superior Court, Beverly Hills Courthouse
 - (3) Case number: BC 545264
 - (4) Status: Motion to Consolidate filed by Plaintiff scheduled for hearing.
- Additional cases are described in Attachment 13a.
- b. A motion to consolidate coordinate will be filed by (*name party*):

14. Bifurcation

- The party or parties intend to file a motion for an order bifurcating, severing, or coordinating the following issues or causes of action (*specify moving party, type of motion, and reasons*):
 Defendants reserve the right to seek motion to bifurcate certain issues, including but not limited to damages issues, including whether punitive damages can be sought here.

15. Other motions

- The party or parties expect to file the following motions before trial (*specify moving party, type of motion, and issues*):
 Please see Attachment 6b.

16. Discovery

- a. The party or parties have completed all discovery.
- b. The following discovery will be completed by the date specified (*describe all anticipated discovery*):

| <u>Party</u> | <u>Description</u> | <u>Date</u> |
|--------------------------|-----------------------------------|-------------|
| Plaintiff and Defendants | Written Discovery | By Code |
| Plaintiff and Defendants | Depositions | By Code |
| Plaintiff and Defendants | Experts | By Code |
| Third Parties | Written Discovery and Depositions | By Code |

- c. The following discovery issues, including issues regarding the discovery of electronically stored information, are anticipated (*specify*):
 Please see Attachment 6b.

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| PLAINTIFF/PETITIONER: Wade Robson | CASE NUMBER: BC508502 |
| DEFENDANT/RESPONDENT: MJJ Productions, et al. | |

17. Economic litigation

- a. This is a limited civil case (i.e., the amount demanded is \$25,000 or less) and the economic litigation procedures in Code of Civil Procedure sections 90-98 will apply to this case.
- b. This is a limited civil case and a motion to withdraw the case from the economic litigation procedures or for additional discovery will be filed (if checked, explain specifically why economic litigation procedures relating to discovery or trial should not apply to this case):

18. Other issues

- The party or parties request that the following additional matters be considered or determined at the case management conference (specify):
 Defendants believe this matter is "complex" within the meaning of the L.A. Superior Court's Complex Litigation Program. Before Defendants can file the Complex Litigation Program Questionnaire, Defendants seek to raise the issue with this Court to determine whether it prefers to keep the case (Complex Questionnaire, Question 7.h.).

19. Meet and confer

- a. The party or parties have met and conferred with all parties on all subjects required by rule 3.724 of the California Rules of Court (if not, explain):
 Parties have discussed scheduling in great detail before, but have not discussed all 3.724 issues since this matter returned to the Superior Court. The parties will meet and confer after Defendants file their petition to transfer this matter in to the L.A. Superior Court's Complex Litigation Program.
- b. After meeting and conferring as required by rule 3.724 of the California Rules of Court, the parties agree on the following (specify):

20. Total number of pages attached (if any): 7

I am completely familiar with this case and will be fully prepared to discuss the status of discovery and alternative dispute resolution, as well as other issues raised by this statement, and will possess the authority to enter into stipulations on these issues at the time of the case management conference, including the written authority of the party where required.

Date: February 27, 2024

Thomas A. Mesereau, Counsel for Defendants

 (TYPE OR PRINT NAME)



 (SIGNATURE OF PARTY OR ATTORNEY)

Jennifer L. Keller, Counsel for Defendants

 (TYPE OR PRINT NAME)



 (SIGNATURE OF PARTY OR ATTORNEY)

Additional signatures are attached.

ATTACHMENT 4b

In 2013, four years after Michael Jackson died, Plaintiff filed this case along with a companion case against Michael Jackson's estate in the probate court. The Court dismissed Plaintiff's probate case as time-barred by the filing deadlines under California's Probate Code. Plaintiff can no longer bring any claims against Mr. Jackson or his estate, and so Plaintiff is left to pursue his claims against two corporate entities that were created to hold Mr. Jackson's intellectual property.

Because Plaintiff can no longer pursue his claims against Mr. Jackson or his estate directly, Plaintiff brought his claims in this case on a theory that Mr. Jackson's corporate entities, acting through the employees, had a duty to protect Plaintiff from those entities' sole shareholder, Mr. Jackson. Many of Plaintiff's allegations regarding what the entities' employees observed are based on decades-old testimony and declarations from other cases or (unsworn) interviews with law enforcement or the media. The nature of Plaintiff's theories of liability, the decades-long gap between the alleged misconduct and Plaintiff's bringing of his claims, and Plaintiff's participation in a 2019 film, *Leaving Neverland*, will create complicated discovery, law-and-motion, and trial issues.

First, the Court will need to decide whether to consolidate this action with the related case, *James Safechuck v. MJJ Productions, Inc., et al.*, Case No. BC545264. Plaintiff previously indicated he wanted to consolidate the case for all purposes, and recently filed a Motion for Consolidation. Initially, the matters appeared too distinct to make consolidation appropriate. Now, however, discovery has demonstrated the cases have intertwined percipient witnesses and involve similar legal issues. Accordingly, Defendants agree with Plaintiff and believe consolidation of this matter with the *Safechuck* matter for all purposes, including trial, is appropriate. Defendants filed a response to Plaintiff's Motion for Consolidation reflecting this position, but requested the Court hold the matter in abeyance until after Defendants file their petition to have this matter designated "complex" under L.A. Superior Court Local Rule 3.3(k). Whether the Court consolidates this matter with *Safechuck*, the Court will need to oversee much of the discovery, including certain depositions that have already been concluded, but which will need to be expanded to cover the allegations from both Robson and Safechuck, along with the new allegations from their participation in a film, discussed below.

Regardless of the Court's decision on whether to consolidate the matters for trial, there will be discovery issues that need to be addressed related to Plaintiff's involvement in a highly publicized film, *Leaving Neverland*, in which Plaintiff reiterated the substance of his allegations against Mr. Jackson. Plaintiff's allegations differed materially between his statements in his complaint and those in *Leaving Neverland*, however. Defendants believe there are significant amounts of unused interview footage with Plaintiff (and the plaintiff in the related case, James Safechuck) that will demonstrate additional inconsistencies between Plaintiff's claims and his later recitations of the alleged abuse, going directly to Plaintiff's credibility. But Defendants do not currently know the custodian(s) or location(s) of the footage. For those custodians in the United States, depending on the particular custodian's location, one or more subpoena recipients may

assert privilege objections that could involve intricate choice-of-law issues requiring pre-trial motion practice as well.

Given extended duration of the alleged abuse in Plaintiff's claims, the thirty-year gap between the alleged abuse and now, and the recent, highly publicized film about Plaintiff's claims, there are dozens of third-party witnesses who will have relevant information, several of whom are believed to be located outside the United States. As there are numerous third-party witnesses who will need to be subpoenaed for documents and testimony, some of whom were already deposed in this case before the film's release, Defendants expect there will be extensive motion practice regarding third-party discovery.

After discovery concludes, Defendants anticipate bringing dispositive motions based on the lack of any admissible evidence demonstrating any of the entities' employees could reasonably have known about or prevented the alleged abuse. Additionally, because the discovery record is not yet complete, there may be grounds for other dispositive motions.

Should those motions be unsuccessful, there will be numerous difficult, complex evidentiary and legal issues to be addressed in the leadup to trial. For example, the dozens of potential witnesses and previous sworn and unsworn statements from those witnesses will require the parties to litigate and the Court to resolve myriad motions *in limine* to ensure only proper, competent evidence can be introduced during trial. Additionally, as the Court is likely aware, there have been highly publicized claims previously asserted against Mr. Jackson for sexual abuse that Plaintiff may seek to introduce. Two of these cases, a 1993 grand jury investigation and a 2005 trial both brought by the Santa Barbara district attorney, resulted in substantial testimonial evidence that (depending on the witness and evidence) the parties may seek to introduce or exclude in whole or in part. If this case is not consolidated for trial with the Safechuck matter, there will also likely be evidentiary issues regarding the admissibility of Safechuck's allegations in this case.

ATTACHMENT 6b

Before this case can be tried, there are numerous discovery issues and legal issues that need to be addressed, making it impractical to have this matter ready for trial within 12 months.

Further fact discovery (assuming the cases are not consolidated): The deposition of third-party Charli Michaels remains open and needs to be completed. Robson's deposition was also left open. As discussed below, however, there is extensive additional discovery needed as a result of Robson's participation in the *Leaving Neverland* film.

Further fact discovery related to *Leaving Neverland*: After most fact discovery in this case was taken, Wade Robson participated in *Leaving Neverland*, a four-hour film detailing his allegations against Michael Jackson. Defendants understand that Robson is participating in a follow-up film regarding the same subject. In the film, Robson made numerous statements that were inconsistent with testimony in this and other matters. Defendants intend to pursue discovery of Robson and his family members, along with others who participated in the film. Robson's credibility is crucial to this case, where the only other alleged "witness" to his supposed abuse (Michael Jackson) is deceased. Defendants expect Robson and others to object to this discovery and it is likely the Court will need to intervene.

Defendants also believe there are significant amounts of unused interview footage with Plaintiff (and the plaintiff in the related case, James Safechuck) that will demonstrate additional inconsistencies between Plaintiff's claims and his later recitations of the alleged abuse, again going directly to Plaintiff's credibility. But Defendants do not currently know the custodian(s) or location(s) of the footage. Depending on the particular custodian and location of the footage, one or more subpoena recipients may assert privilege objections that could involve intricate choice-of-law issues requiring pre-trial motion practice as well.

Further independent mental examination: Robson participated in an independent mental examination (IME) in August 2016. Almost eight years have passed since then rendering the prior IME "stale." Defendants believe that they should be entitled to take a second IME to assess Robson's current mental state. Defendants expect Robson will object, requiring Court intervention.

Expert discovery: Expert discovery and disclosures have not commenced. Defendants expect that there will be extensive expert discovery and potential disputes will arise regarding it.

Dispositive motion practice: Defendants anticipate bringing dispositive motions based on the lack of any admissible evidence demonstrating any of the entities' employees could reasonably have known or prevented the alleged abuse. Defendants may also bring additional dispositive motions based on issues discovered during the remaining discovery process.

Evidentiary Issues: Given the very sensitive nature of the allegations in this case, we expect there to be extensive litigation, including myriad motions *in limine* over what evidence can, and cannot, be admitted at trial. As Plaintiff's claims will involve the testimony of numerous witnesses,

many of whom have either provided sworn testimony or provided unsworn interviews in the media (or both), evidentiary issues relating to the admissibility of prior, unproven and disputed allegations against Michael Jackson will almost certainly arise.

Pre-trial Issues Relating to the Jackson Estate: As noted above, Robson's claims directly against the Jackson Estate have long since been dismissed in a final order from which Robson did not seek appellate review. Given this, Defendants expect that legal issues will arise—in the context of both evidentiary rulings and jury instructions, among others—relating to Robson's attempt to use the Defendants here as "proxies" for Michael Jackson's Estate, which is impermissible. As just one example, punitive damages against a decedent's Estate are barred entirely (C.C.P. § 377.42); yet, this case seeks punitive damages against the two Defendants. The parties will likely need to engage in motion practice to ensure that punitive damages are only evaluated (if the Court permits seeking their recovery at all) based on conduct that can be legally imputed to Defendants under corporate agency principles, and not the *alleged* misconduct of Michael Jackson personally.

Pre-trial Issues Related to Jury Instructions: Defendants expect the jury instructions will require extensive Court involvement in advance of trial. Plaintiff is not bringing his claim directly against Mr. Jackson or his estate. Rather, Plaintiff's claims are brought against Mr. Jackson's companies and his theory of liability is that those companies—acting through their employees—failed to supervise Mr. Jackson, placing Plaintiff in harm's way. The jury instructions will need to be drafted carefully and in full compliance with existing law and the Court of Appeal's decision in this case to ensure the jury is charged properly. Defendants anticipate this issue will require significant pre-trial briefing and likely additional briefing during trial.

ATTACHMENT 7

Until the parties have completed discovery and determined who is and is not available for trial, it is hard to predict the trial length with any specificity, but think it could be between 30-45 days. Once Defendants have narrowed the case and determined who will be available to testify at trial, the trial length could be reduced dramatically.

ATTACHMENT 8

Susan C. Yu (SBN 195640)
susan@sylglaw.com
SYLG, APC
2121 Avenue of the Stars, Suite 800
Los Angeles, California 90067
Tel. 1: (310) 407-5480
Tel. 2: (213) 550-5930

Jonathan P. Steinsapir (SBN 226281)
jsteinsapir@khiks.com
Katherine Kleindienst (SBN 274423)
kkleindienst@khiks.com
KINSELLA HOLLEY ISER KUMP STEINSAPIR LLP
11766 Wilshire Blvd., Suite 750
Los Angeles, California 90025
Tel.: (310) 566-9800
Fax: (310) 566-9850

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

ATTACHMENT 13a

1. Name of case: *In re the Estate of Michael Joseph Jackson (Deceased)*
2. Name of court: Los Angeles Superior Court, Stanley Mosk Courthouse
3. Case number: BP 117321
4. Status: Still pending

1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF ORANGE**

3 I am over the age of 18 and not a party to the within action. My business address is 18300
4 Von Karman Avenue, Suite 930, Irvine, California 92612-1057.

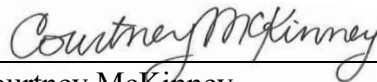
5 On February 27, 2024 I served the foregoing documents described

6 **DEFENDANTS' CASE MANAGEMENT STATEMENT**

7 on the interested parties through their counsel identified on the attached service list by the
8 following means of service:

- 9 **BY EMAIL:** The document(s) was sent electronically to each of the individuals at the email
10 address(es) indicated on the attached service list. The transmission was made with no error
11 reported.
- 12 **BY MAIL:** I placed true copies thereof in sealed envelope(s) addressed as stated on the
13 attached service list, on the above-mentioned date. I deposited the sealed envelope(s) on the
14 above-mentioned date with the United States Postal Service with postage fully prepaid for
15 mailing to the persons identified above.
- 16 **BY HAND DELIVERY:** The document(s) were sealed in envelope(s) addressed as stated
17 on the attached service list and given to ASAP Legal Solution with instructions to deliver by
18 messenger before 5:00 p.m. on the above-mentioned date.
- 19 **BY OVERNIGHT NEXT DAY DELIVERY:** On the above-mentioned date, I placed a
20 true copy of the above mentioned document(s), together with a signed copy of this
21 declaration, in a sealed envelope or package designated by the overnight delivery provider,
22 with delivery fees paid or provided for, addressed to the person(s) as indicated on the
23 attached service list and deposited same in a box or other facility regularly maintained by the
24 overnight delivery provider or delivered same to an authorized courier or driver authorized
25 by the overnight delivery provider to receive documents.
- 26 **(STATE)** I declare under penalty of perjury under the laws of the State of California that
27 the foregoing is true and correct.

28 Executed on February 27, 2024.



Courtney McKinney

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SERVICE LIST

John Carpenter
Asa O. Eaton
CARPENTER & ZUCKERMAN
8827 West Olympic Blvd.
Beverly Hills, California 90211
Tel. (310) 273-1230
Fax. (310) 858-1063
E-mail: carpenter@cz.law
eaton@cz.law
teamcarpenter@cz.law

Attorneys for Plaintiff
Wade Robson