

ATTORNEY OR PARTY WITHOUT ATTORNEY STATE BAR NUMBER: 155610/337080 NAME: John C. Carpenter, Esq.; Alina S. Vulic, Esq. FIRM NAME: Carpenter & Zuckerman STREET ADDRESS: 8827 W. Olympic Blvd. CITY: Beverly Hills STATE: CA ZIP CODE: 90211 TELEPHONE NO.: 310.273.1230 x303 FAX NO.: 310.858.1063 EMAIL ADDRESS: teamcarpenter@cz.law; carpenter@cz.law; avulic@cz.law; ATTORNEY FOR (name): Plaintiffs Wade Robson & James Safechuck	FOR COURT USE ONLY  <b>Electronically FILED by                  Superior Court of California,                  County of Los Angeles                  2/27/2024 9:48 PM                  David W. Slayton,                  Executive Officer/Clerk of Court,                  By K. Parenteau, Deputy Clerk</b>
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES</b> STREET ADDRESS: 9355 Burton Way, MAILING ADDRESS: 9355 Burton Way, CITY AND ZIP CODE: Beverly Hills, CA 90210 BRANCH NAME: Beverly Hills Courthouse	
PLAINTIFF/PETITIONER: Wade Robson & James Safechuck DEFENDANT/RESPONDENT: MJJ Ventures, Inc., MJJ Productions Inc. et. al.	
<b>CASE MANAGEMENT STATEMENT</b>	
(Check one): <input checked="" type="checkbox"/> <b>UNLIMITED CASE</b> <input type="checkbox"/> <b>LIMITED CASE</b> (Amount demanded exceeds \$35,000) (Amount demanded is \$35,000 or less)	
CASE NUMBER: BC508502/BC545264	
A <b>CASE MANAGEMENT CONFERENCE</b> is scheduled as follows: Date: February 28, 2024 Time: 8:30am Dept.: 207 Div.: Room: Address of court (if different from the address above):  <input checked="" type="checkbox"/> <b>Notice of Intent to Appear by Telephone, by (name):</b> John C. Carpenter, Esq. and Alina S. Vulic, Esq.	

**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): Plaintiff Wade Robson & Plaintiff James Safechuck
2. **Complaint and cross-complaint (to be answered by plaintiffs and cross-complainants only)**
  - a. The complaint was filed on (date): BC508502 filed May 10, 2013/BC545264 filed May 9, 2014
  - 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):  
 (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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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*):  
These cases arise out of the continued, pervasive, sexual abuse inflicted onto Plaintiffs Wade Robson and James Safechuck, by the late entertainer, Michael Jackson, MJJ Ventures, Inc. and MJJ Productions Inc. The sexual abuse of both Plaintiffs occurred over the same period of time when both were both small, prepubescent boys. Plaintiffs allege damages in connection with the trauma arising out of the Defendants' failures to protect Plaintiffs, who were in their care.

(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):

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):

c. Dates on which parties or attorneys will not be available for trial (*specify dates and explain reasons for unavailability*):  
04/15/24, 04/22/2024, May 2024, 06/03/24; July 2024; August 2024; September 2024; October 2024; 11/1/2024-01/06 2025; 03/12/2025; 03/19/2025; 04/28/2025

7. **Estimated length of trial**

The party or parties estimate that the trial will take (*check one*)

a.  days (*specify number*): 15-19

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:

b. Firm:

c. Address:

d. Telephone number:

f. Fax number:

e. Email address:

g. Party represented:

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 of the California Rules of Court 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*):

PLAINTIFF/PETITIONER: Wade Robson & James Safechuck DEFENDANT/RESPONDENT: MJJ Ventures, Inc., MJJ Productions Inc. et. al.	CASE NUMBER: BC508502/BC545264
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10. c. In the table below, 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 <b>are willing</b> to participate in the following ADR processes ( <i>check all that apply</i> ):	If the party or parties completing this form in the case <b>have agreed</b> 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 checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Mediation session not yet scheduled <input type="checkbox"/> Mediation session scheduled for (date): <input type="checkbox"/> Agreed to complete mediation by (date): <input type="checkbox"/> Mediation completed on (date):
(2) Settlement conference	<input type="checkbox"/>	<input type="checkbox"/> Settlement conference not yet scheduled <input type="checkbox"/> Settlement conference scheduled for (date): <input type="checkbox"/> Agreed to complete settlement conference by (date): <input type="checkbox"/> Settlement conference completed on (date):
(3) Neutral evaluation	<input type="checkbox"/>	<input type="checkbox"/> Neutral evaluation not yet scheduled <input type="checkbox"/> Neutral evaluation scheduled for (date): <input type="checkbox"/> Agreed to complete neutral evaluation by (date): <input type="checkbox"/> Neutral evaluation completed on (date):
(4) Nonbinding judicial arbitration	<input type="checkbox"/>	<input type="checkbox"/> Judicial arbitration not yet scheduled <input type="checkbox"/> Judicial arbitration scheduled for (date): <input type="checkbox"/> Agreed to complete judicial arbitration by (date): <input type="checkbox"/> Judicial arbitration completed on (date):
(5) Binding private arbitration	<input type="checkbox"/>	<input type="checkbox"/> Private arbitration not yet scheduled <input type="checkbox"/> Private arbitration scheduled for (date): <input type="checkbox"/> Agreed to complete private arbitration by (date): <input type="checkbox"/> Private arbitration completed on (date):
(6) Other ( <i>specify</i> ):	<input type="checkbox"/>	<input type="checkbox"/> ADR session not yet scheduled <input type="checkbox"/> ADR session scheduled for (date): <input type="checkbox"/> Agreed to complete ADR session by (date): <input type="checkbox"/> ADR completed on (date):

PLAINTIFF/PETITIONER: Wade Robson & James Safechuck DEFENDANT/RESPONDENT: MJJ Ventures, Inc., MJJ Productions Inc. et. al.	CASE NUMBER: BC508502/BC545264
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**11. Insurance**

- a.  Insurance carrier, if any, for party filing this statement (*name*):
- 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: Safechuck v. MJJ Ventures Inc. et. al.
  - (2) Name of court: Superior Court of California-Los Angeles County-Beverly Hills Courthouse
  - (3) Case number: BC545264
  - (4) Status: Related. Additional cases are described in Attachment 13a.
- b.  A motion to  consolidate  coordinate will be filed by (*name party*):  
has been filed by Plaintiffs to be heard on February 28, 2024; Dept 207 of the Beverly Hills Courthouse before Judge Whitaker.

**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*):

**15. Other motions**

The party or parties expect to file the following motions before trial (*specify moving party, type of motion, and issues*):

**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>
Plaintiffs	Written Discovery	January 31, 2025
Plaintiffs	Expert Discovery	February 28, 2025
Plaintiffs	Depositions	January 31, 2025

- c.  The following discovery issues, including issues regarding the discovery of electronically stored information, are anticipated, (*specify*):  
Plaintiffs anticipate potential delays in subpoenaing witnesses who wish to preserve their privacy, given the serious and private nature of the allegations set forth in Plaintiffs' respective complaints. Plaintiffs further anticipate that some witnesses who are material in this matter, live outside of this jurisdiction, state or the United States and coordinating those deposition may likewise take additional time. Plaintiffs anticipate delays associated with certain witnesses' desire to maintain privacy.

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17. Economic litigation

- a.  This is a limited civil case (i.e., the amount demanded is \$35,000 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):  
A Motion to Consolidate Cases BC508502 (Robson, Wade) and BC545264 (Safechuck, James) is currently pending before this Court and is set to be heard on February 28, 2024 at 8:30am in Department 207 of the Beverly Hills Courthouse before the Hon. Michael Whitaker. Defendants have filed a non-opposition to said Motion.

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):  
Plaintiffs' Counsel has made attempts to meet and confer with Defendants' Counsel regarding all subjects. Plaintiffs' Counsel has been unsuccessful in reaching Defendants' Counsel.
- 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): \_\_\_\_\_

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

John C. Carpenter, Esq.  
\_\_\_\_\_  
(TYPE OR PRINT NAME)



*John Carpenter, Esq.*

\_\_\_\_\_  
(SIGNATURE OF PARTY OR ATTORNEY)



\_\_\_\_\_  
(TYPE OR PRINT NAME)

\_\_\_\_\_  
(SIGNATURE OF PARTY OR ATTORNEY)

Additional signatures are attached.

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**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 8827 West Olympic Boulevard, Beverly Hills, California 90211.

On Tuesday, February 27, 2024, I served the foregoing document described as:

**CASE MANAGEMENT STATEMENT**

**[X] VIA ELECTRONIC TRANSMISSION** to the addressee(s) listed below:

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Aaron C. Liskin  
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BY ELECTRONIC SERVICE: Pursuant to Code of Civil Procedure § 1010.6(a)(2)(A)(i), 1010.6(a)(2)(A)(ii), and/or necessity resulting from the Safer at Home order/regulation issued by the City and County of Los Angeles effective March 20, 2020: from my email address [vtompkins@cz.law](mailto:vtompkins@cz.law) to the e-mail address(es) listed above.

BY MAIL: I am familiar with the practice of Carpenter & Zuckerman for collection and processing of correspondence for mailing with the United States Postal Service. Correspondence so collected and processed is deposited with the United States Postal Service that same day in the ordinary course of business. On this date, a copy of said document was placed in a sealed envelope, with postage fully prepaid, addressed as set forth herein, and such envelope was placed for collection and mailing at Carpenter & Zuckerman, Los Angeles, California, following ordinary business practices.

BY PERSONAL SERVICE: I caused such envelope to be delivered by hand to counsel for defendants.

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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, and that this declaration was executed on Tuesday, February 27, 2024, at Los Angeles, California.

*/s/ Valerie Tompkins*

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Valerie Tompkins