

12:39:14 p.m. 05-20-2015 2

May. 20. 2015 12:34PM

No. 4063 P. 2

SUM-100

**SUMMONS
(CITACION JUDICIAL)**

**NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):**

**WILLIAM H. COSBY, JR., an individual and DOES 1 through 100,
inclusive**

**YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):**

JANICE DICKINSON, an individual

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

FILED
Superior Court of California
County of Los Angeles

MAY 20 2015

Sherri R. Carter, Executive Officer/Clerk
By Dawn Alexander Deputy
Dawn Alexander

NOTICE You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. NOTE: The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **AVISO** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información e continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto al darse que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.courtinfo.ca.gov/selfhelp), en la biblioteca de leyes de su condado o en la corte que le queda más cerca. Si no puede pagar la cuota de presentación, pida el secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California (www.courtinfo.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 o más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desearchar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es): Central District
111 N. Hill Street
Los Angeles, CA 90012

CASE NUMBER:
(Número del caso) **BC 5 80 909**

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
The Bloom Firm, 20700 Ventura Blvd., Suite 301, Woodland Hills, CA 91364, Phone: (818) 914-7314

SHERRI R. CARTER

DATE: May 20, 2015
(Fecha)

Clerk, by
(Secretario) DAWN ALEXANDER Deputy
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).



NOTICE TO THE PERSON SERVED: You are served

- 1. as an individual defendant.
- 2. as the person sued under the fictitious name of (specify):

3. on behalf of (specify):

- under: CCP 416.10 (corporation) CCP 416.60 (minor)
- CCP 416.20 (defunct corporation) CCP 416.70 (conservatee)
- CCP 416.40 (association or partnership) CCP 416.90 (authorized person)
- other (specify):

4. by personal delivery on (date):

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No. 4063 P. 3

CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Lisa Bloom, Esq. SBN: 158458 Nadia Taghizadeh, Esq. SBN: 259328 The Bloom Firm 20700 Ventura Blvd., Suite 301, Woodland Hills, CA 91364 TELEPHONE NO.: (818) 914-7314 FAX NO.: (866) 852-5666 ATTORNEY FOR (Name): Plaintiff, Janice Dickinson		FOR COURT USE ONLY FILED Superior Court of California County of Los Angeles MAY 20 2015 Sherril R. Carter, Executive Officer/Clerk By <u>Dawn Alexander</u> Deputy
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: SAME CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Central District		CASE NUMBER: BC 5 8 0 9 0 9 JUDGE: DEPT:
CASE NAME: Janice Dickinson v. William H. Cosby, Jr.		
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000)	<input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)	Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other PIP/DWD (Personal Injury/Property Damages/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (46) <input type="checkbox"/> Other PIP/DWD (23) Non-PIP/DWD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input checked="" type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PIP/DWD tort (35) Employment <input type="checkbox"/> Wrongful termination (38) <input type="checkbox"/> Other employment (15)	Contract <input type="checkbox"/> Breach of contract/warranty (08) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
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2. This case is is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:

a. <input type="checkbox"/> Large number of separately represented parties	d. <input type="checkbox"/> Large number of witnesses
b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve	e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
c. <input type="checkbox"/> Substantial amount of documentary evidence	f. <input type="checkbox"/> Substantial postjudgment judicial supervision

3. Remedies sought (check all that apply): a. monetary b. nonmonetary; declaratory or injunctive relief c. punitive

4. Number of causes of action (specify): 3

5. This case is is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: May 20, 2015
 Lisa Bloom, Esq. Lisa Bloom
(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you must complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check **one** box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

<p>Auto Tort Auto (22)—Personal Injury/Property Damage/Wrongful Death Uninsured Motorist (46) (<i>if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto</i>)</p> <p>Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort Asbestos (04) Asbestos Property Damage Asbestos Personal Injury/Wrongful Death Product Liability (<i>not asbestos or toxic/environmental</i>) (24) Medical Malpractice (45) Medical Malpractice—Physicians & Surgeons Other Professional Health Care Malpractice Other PI/PD/WD (23) Premises Liability (e.g., slip and fall) Intentional Bodily Injury/PD/WD (e.g., assault, vandalism) Intentional Infliction of Emotional Distress Negligent Infliction of Emotional Distress Other PI/PD/WD</p> <p>Non-PI/PD/WD (Other) Tort Business Tort/Unfair Business Practice (07) Civil Rights (e.g., discrimination, false arrest) (<i>not civil harassment</i>) (08) Defamation (e.g., slander, libel) (13) Fraud (16) Intellectual Property (19) Professional Negligence (25) Legal Malpractice Other Professional Malpractice (<i>not medical or legal</i>) Other Non-PI/PD/WD Tort (35)</p> <p>Employment Wrongful Termination (36) Other Employment (15)</p>	<p>Contract Breach of Contract/Warranty (06) Breach of Rental/Lease Contract (<i>not unlawful detainer or wrongful eviction</i>) Contract/Warranty Breach—Seller Plaintiff (<i>not fraud or negligence</i>) Negligent Breach of Contract/Warranty Other Breach of Contract/Warranty Collections (e.g., money owed, open book accounts) (09) Collection Case—Seller Plaintiff Other Promissory Note/Collections Case Insurance Coverage (<i>not provisionally complex</i>) (18) Auto Subrogation Other Coverage Other Contract (37) Contractual Fraud Other Contract Dispute</p> <p>Real Property Eminent Domain/Inverse Condemnation (14) Wrongful Eviction (33) Other Real Property (e.g., quiet title) (26) Writ of Possession of Real Property Mortgage Foreclosure Quiet Title Other Real Property (<i>not eminent domain, landlord/tenant, or foreclosure</i>)</p> <p>Unlawful Detainer Commercial (31) Residential (32) Drugs (38) (<i>if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential</i>)</p> <p>Judicial Review Asset Forfeiture (05) Petition Re: Arbitration Award (11) Writ of Mandate (02) Writ—Administrative Mandamus Writ—Mandamus on Limited Court Case Matter Writ—Other Limited Court Case Review Other Judicial Review (39) Review of Health Officer Order Notice of Appeal—Labor Commissioner Appeals</p>	<p>Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403) Antitrust/Trade Regulation (03) Construction Defect (10) Claims Involving Mass Tort (40) Securities Litigation (28) Environmental/Toxic Tort (30) Insurance Coverage Claims (<i>arising from provisionally complex case type listed above</i>) (41)</p> <p>Enforcement of Judgment Enforcement of Judgment (20) Abstract of Judgment (Out of County) Confession of Judgment (<i>non-domestic relations</i>) Sister State Judgment Administrative Agency Award (<i>not unpaid taxes</i>) Petition/Certification of Entry of Judgment on Unpaid Taxes Other Enforcement of Judgment Case</p> <p>Miscellaneous Civil Complaint RICO (27) Other Complaint (<i>not specified above</i>) (42) Declaratory Relief Only Injunctive Relief Only (<i>non-harassment</i>) Mechanics Lien Other Commercial Complaint Case (<i>non-tort/non-complex</i>) Other Civil Complaint (<i>non-tort/non-complex</i>)</p> <p>Miscellaneous Civil Petition Partnership and Corporate Governance (21) Other Petition (<i>not specified above</i>) (43) Civil Harassment Workplace Violence Elder/Dependent Adult Abuse Election Contest Petition for Name Change Petition for Relief From Late Claim Other Civil Petition</p>
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**CIVIL CASE COVER SHEET ADDENDUM AND
STATEMENT OF LOCATION
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

This form is required pursuant to Local Rule 2.0 in all new civil case filings in the Los Angeles Superior Court.

Item I. Check the types of hearing and fill in the estimated length of hearing expected for this case:

JURY TRIAL? YES CLASS ACTION? YES LIMITED CASE? YES TIME ESTIMATED FOR TRIAL 5-7 HOURS/ DAYS

Item II. Indicate the correct district and courthouse location (4 steps -- If you checked "Limited Case", skip to Item III, Pg. 4):

Step 1: After first completing the Civil Case Cover Sheet form, find the main Civil Case Cover Sheet heading for your case in the left margin below, and, to the right in Column A, the Civil Case Cover Sheet case type you selected.

Step 2: Check one Superior Court type of action in Column B below which best describes the nature of this case.

Step 3: In Column C, circle the reason for the court location choice that applies to the type of action you have checked. For any exception to the court location, see Local Rule 2.0.

Applicable Reasons for Choosing Courthouse Location (see Column C below)

- | | |
|--|--|
| 1. Class actions must be filed in the Stanley Mosk Courthouse, central district. | 6. Location of property or permanently garaged vehicle. |
| 2. May be filed in central (other county, or no bodily injury/property damage). | 7. Location where petitioner resides. |
| 3. Location where cause of action arose. | 8. Location where defendant/respondent functions wholly. |
| 4. Location where bodily injury, death or damage occurred. | 9. Location where one or more of the parties reside. |
| 5. Location where performance required or defendant resides. | 10. Location of Labor Commissioner Office |

Step 4: Fill in the information requested on page 4 in Item III; complete Item IV. Sign the declaration.

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Auto Tort	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
	Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death -- Uninsured Motorist	1., 2., 4.
Other Personal Injury/Property Damage/ Wrongful Death Tort	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage	2.
		<input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	2.
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 6.
	Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons	1., 4.
		<input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 4.
Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1., 4.	
	<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1., 4.	
	<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress	1., 3.	
	<input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 4.	

SHORT TITLE:

Janice Dickinson v. William H. Cosby, Jr.

CASE NUMBER

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Non-Personal Injury/ Property Damage/ Wrongful Death Tort	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 3.
	Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
	Defamation (13)	<input checked="" type="checkbox"/> A6010 Defamation (slander/libel)	1. (2) (3)
	Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.
	Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3. 1., 2., 3.
	Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2., 3.
Employment	Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
	Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1., 2., 3. 10.
Contract	Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2., 5. 2., 5. 1., 2., 5. 1., 2., 5.
	Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5., 6. 2., 5.
	Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
	Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 5. 1., 2., 3., 5. 1., 2., 3., 8.
	Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels _____	2.
Real Property	Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
	Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6. 2., 6. 2., 6.
	Unlawful Detainer	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
	Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
	Unlawful Detainer- Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2., 6.
	Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.

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	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Judicial Review	Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2., 6.
	Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.
	Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2., 8. 2. 2.
	Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2., 8.
Provisionally Complex Litigation	Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1., 2., 8.
	Construction Defect (10)	<input type="checkbox"/> A6007 Construction Defect	1., 2., 3.
	Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1., 2., 8.
	Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.
	Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.
	Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1., 2., 5., 8.
Enforcement of Judgment	Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment	2., 9.
		<input type="checkbox"/> A6160 Abstract of Judgment	2., 6.
		<input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations)	2., 9.
		<input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes)	2., 8.
		<input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax	2., 8.
		<input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 8., 9.
Miscellaneous Civil Complaints	RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1., 2., 8.
	Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only	1., 2., 8.
		<input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment)	2., 8.
		<input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex)	1., 2., 8.
	<input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1., 2., 8.	
Miscellaneous Civil Petitions	Partnership Corporation Governance (21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2., 8.
	Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment	2., 3., 9.
		<input type="checkbox"/> A6123 Workplace Harassment	2., 3., 9.
		<input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case	2., 3., 9.
		<input type="checkbox"/> A6190 Election Contest	2.
		<input type="checkbox"/> A6110 Petition for Change of Name	2., 7.
<input type="checkbox"/> A6170 Petition for Relief from Late Claim Law	2., 3., 4., 8.		
	<input type="checkbox"/> A6100 Other Civil Petition	2., 9.	

SHORT TITLE: Janice Dickinson v. William H. Cosby, Jr.	CASE NUMBER
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Item III. Statement of Location: Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., Step 3 on Page 1, as the proper reason for filing in the court location you selected.

REASON: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case. <input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input checked="" type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.		ADDRESS: Los Angeles, California c/o The Bloom Firm 20700 Ventura Blvd., Suite 301 Woodland Hills, CA 91364
CITY: Los Angeles	STATE: CA	ZIP CODE: 90012

Item IV. Declaration of Assignment: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that the above-entitled matter is properly filed for assignment to the Stanley Mosk courthouse in the Central District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., § 392 et seq., and Local Rule 2.0, subds. (b), (c) and (d)].

Dated: May 20, 2015


 (SIGNATURE OF ATTORNEY/FILING PARTY)

PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 03/11).
5. Payment in full of the filing fee, unless fees have been waived.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

1 building.

2 3. Ms. Dickinson brings this action for defamation and related claims.

3 **JURISDICTION AND VENUE**

4 4. The Court has personal jurisdiction over the Defendant because he is a resident
5 of and does business in the State of California, and owns real property in the State of California.

6 5. Venue is proper in this county because the Defendant resides in this county,
7 owns real property in this county and does business in this county, and the injuries alleged
8 herein occurred in this county.

9 **PARTIES**

10 6. Plaintiff JANICE DICKINSON (“Ms. Dickinson”) is an individual who resides
11 in the County of Los Angeles, California.

12 7. Ms. Dickinson is an internationally known fashion model, photographer and
13 author, often called “the world’s first supermodel.” She has been on the cover of *Cosmo*,
14 *Harper’s Bazaar*, *Marie Claire*, *Playboy* and many other magazines. Ms. Dickinson appeared
15 on the cover of prestigious *Vogue* magazine (both American and international editions) 37
16 times, and she appeared on the cover of *Elle* magazine seven times in a row. She has been the
17 face of ad campaigns for many products, including Revlon, Alberto VO5, Balmain, Obao,
18 Christian Dior, Clairol, Hush Puppies, Orbit gum, Max Factor, Virginia Slims, and Cutex.

19 8. More recently, Ms. Dickinson has become a successful television star on many
20 reality shows, including her own, *The Janice Dickinson Modeling Agency*, which ran for four
21 seasons. She’s also the author of three books chronicling her life as a supermodel, and offering
22 lighthearted dating advice to single women. As a result of her decades of hard work Ms.
23 Dickinson has enjoyed continued success across multiple entertainment platforms, though most
24 models’ careers are finished after a few years. A major component of her popularity and
25 marketability on reality television and in publishing is Ms. Dickinson’s reputation for her
26 colorful, raw, sometimes loud, sometimes vulnerable, but at all times honest “tell-it-like-it-is”
27 personality.

28 9. Defendant WILLIAM H. COSBY, JR. (“Defendant Cosby”), owns residential

1 property in the county of Los Angeles, California and/or does business in the State of
2 California.

3 10. Defendant Cosby is an internationally known comedian, actor and author. He has
4 been publicly accused of sexual assault by over forty women spanning four decades and across
5 the United States. Most of them also allege that he surreptitiously drugged them into a state of
6 unconsciousness prior to sexually assaulting them.

7 11. The true names and capacities, whether corporate, associate, individual or
8 otherwise of defendants DOES 1 through 100, inclusive, are unknown to plaintiff, who
9 therefore sues said defendants by such fictitious names. Each of the defendants designated
10 herein as a DOE is legally responsible in some manner for the events and happenings herein
11 referred to and caused injuries and damages proximately thereby to plaintiff, as herein alleged.
12 Plaintiff will seek leave of Court to amend this Complaint to show their names and capacities
13 when the same have been ascertained.

14 12. At all times mentioned in this complaint, unless otherwise alleged, each
15 defendant was the agent, partner, or employee of every other defendant, and in doing the acts
16 alleged in this complaint, was acting within the course, scope and authority of that agency,
17 partnership, or employment, and with the knowledge and consent of each of the other
18 defendants.

19 **FACTUAL ALLEGATIONS**

20 **I. DEFENDANT COSBY DRUGGED AND RAPED MS. DICKINSON**

21 13. In or about 1982, Ms. Dickinson was in Bali, Indonesia shooting a calendar.
22 There she received a telephone call from Defendant Cosby. On the call, he asked her to fly to
23 Lake Tahoe, Nevada to meet with him. Defendant Cosby offered to pay for her flight from Bali
24 to Lake Tahoe to discuss her future show business and singing career. Excited at the possibility
25 of expanding her career to television and music, Ms. Dickinson agreed.

26 14. After arriving in Lake Tahoe, Ms. Dickinson had dinner with Defendant Cosby.

27 15. Ms. Dickinson was suffering from menstrual pain. Defendant Cosby offered her
28 a glass of wine and a pill which he represented would help her with cramps.

1 28. In reality, Defendant Cosby's seemingly facetious public statements about
2 Spanish Fly revealed his penchant for drugging women and then having sex with them while
3 they were rendered unconscious and unable to consent. Defendant Cosby's references to
4 Spanish Fly were direct admissions of his own predatory behavior.

5 29. Even after dozens of women came forward to disclose that they had been
6 drugged and raped by Defendant Cosby, he has continued to brazenly joke about his criminal
7 activity in at least one public forum. On January 8, 2015, in a stand-up performance in Ontario,
8 Canada, Defendant Cosby asked a woman from the audience who had gotten up where she was
9 going. She told him that she was going to get a drink. He replied: "You have to be careful about
10 drinking around me." This comment was intended by Defendant Cosby to mock, insult, demean
11 and humiliate Ms. Dickinson and his other accusers.

12 **IV. MS. DICKINSON'S 2014 DISCLOSURE THAT COSBY RAPED HER**

13 30. In late 2014, a large number of women publicly disclosed that they had been
14 drugged and raped by Defendant Cosby. Many of them were publicly demeaned by Defendant
15 Cosby and his representatives, by his fans or others. Ms. Dickinson was one of these women
16 who made the difficult decision to reveal that she too was a Cosby victim, to lend her story and
17 voice in support of the credibility of the other victims.

18 31. On or about November 18, 2014, Ms. Dickinson disclosed in a television
19 interview that Defendant Cosby had drugged and raped her. At the time, she was the most high
20 profile accuser who had spoken out publicly against Defendant Cosby.

21 **V. TEAM COSBY GOES ON THE ATTACK AGAINST MS. DICKINSON**

22 32. On or about November 18, 2014, the same day as Ms. Dickinson's first
23 television interview detailing Defendant Cosby's rape of her, Defendant Cosby issued a press
24 statement about Ms. Dickinson to the news media, including Entertainment Tonight (CBS) and
25 BuzzFeed.com ("The November 18 Press Statement"). The November 18 Press Statement was
26 immediately broadcast and published online, then picked up and republished by thousands of
27 media entities worldwide, as Defendant Cosby foresaw and intended.

28

1 33. Defendant Cosby, through his authorized attorney and agent, made the following
2 purported statements of fact regarding Ms. Dickinson in the November 18 Press Statement:

3 a. *We are writing regarding your planned story regarding Janice Dickinson's new*
4 *false and outlandish claims about Mr. Cosby in her recent Entertainment Tonight interview,*
5 *asserting that he raped her in 1982 (the "Story").*

6 b. *That Story is fabricated and is an outrageous defamatory lie...*

7 c. *Her new Story claiming that she had been sexually assaulted is a defamatory*
8 *fabrication...*

9 d. *That never happened, just like the alleged rape never happened.*

10 e. *Ms. Dickinson completely fabricated the Story of alleged rape.*

11 34. Each of the purported statements of fact set forth above is false.

12 35. On or about November 19, 2014, Defendant Cosby published a second statement
13 to the press about Ms. Dickinson, through his authorized attorney and agent ("The November 19
14 Press Statement") which was republished by thousands of media entities worldwide, as
15 Defendant Cosby foresaw and intended.

16 36. Defendant Cosby made the following purported statements of fact regarding Ms.
17 Dickinson in The November 19 Press Statement:

18 a. *"Janice Dickinson's story accusing Bill Cosby of rape is a lie."*

19 b. *"Documentary proof and Ms. Dickinson's own words show that her new story about*
20 *something she now claims happened back in 1982 is a fabricated lie"*

21 37. Each of the purported statements of fact set forth above is false.

22 38. The November 18 Press Statement and the November 19 Press Statement
23 (collectively, the "Defamatory Press Statements") and each of them were unprivileged as no
24 litigation had been filed, threatened or contemplated by or between Ms. Dickinson and
25 Defendant Cosby at that time. In fact, Defendant Cosby knew that any actions based on
26 Defendant's drugging and sexual assault of Ms. Dickinson were time barred such that Ms.
27 Dickinson could not bring an action in 2014 for Defendant Cosby's actions in drugging and
28 raping her in 1982.

1 **FIRST CAUSE OF ACTION**
2 **(Defamation/Defamation Per Se)**

3 47. Ms. Dickinson restates and incorporates by reference, as though fully set forth
4 herein, the allegations contained in each of the paragraphs above.

5 48. The Defamatory Press Statements, and each of them, were false and
6 unprivileged, were written and published with the goal of making Ms. Dickinson an object of
7 ridicule, contempt, hatred or disgrace, and to bring her public and personal humiliation.

8 49. Defendant Cosby either knew that his statements were false or were published
9 with reckless disregard as to their truth or falsity.

10 50. The Defamatory Press Statements and each of them, on their face tend to directly
11 injure Ms. Dickinson in respect to her profession, trade and business by imputing dishonesty to
12 her, effectively calling her a liar about a matter as deeply personal as having been raped.

13 51. As a direct and proximate result of the Defamatory Press Statements, and each of
14 them, Ms. Dickinson has suffered and will suffer loss to her reputation, shame, mortification, and
15 hurt feelings, all to her general damages.

16 52. As a further direct and proximate result of the Defamatory Press Statements, and
17 each of them, Ms. Dickinson has suffered loss of business contracts, business engagements,
18 celebrity show participation, and business deals and will continue to suffer loss of business, in an
19 amount to be proven at trial.

20 53. As a result of this damage to her reputation, Ms. Dickinson's business and personal
21 relationships have been, and will continue to be adversely affected.

22 54. By engaging in the above willful conduct with reckless disregard of truth or falsity,
23 Defendants acted with actual malice and in reckless and conscious disregard to Ms. Dickinson's
24 rights, entitling her to punitive damages.

25 **SECOND CAUSE OF ACTION**
26 **(False Light)**

27 55. Ms. Dickinson restates and incorporates by reference, as though fully set forth
28 herein, the allegations contained in the paragraphs above.

1 56. Defendants' Defamatory Press Statements contain numerous false implications
2 about Ms. Dickinson, including without limitation:

3 (i) that her rape disclosure is "new" or that she made it in 2014 "for the first time,"
4 that is, implying that Ms. Dickinson has falsely copied other claims made publicly by other
5 women against Defendant Cosby in 2014. In fact, as described herein above, Ms. Dickinson
6 disclosed to disinterested third parties that Defendant Cosby raped her years before any other
7 woman had publicly made such a claim.

8 (ii) the implication that Ms. Dickinson's rape disclosure is false and that therefore
9 she is a liar. In fact, Ms. Dickinson was drugged and raped by Defendant Cosby.

10 (iii) the implication that because Ms. Dickinson did not fully disclose the rape in her
11 2002 book that she is now lying about her rape disclosure. In fact, Ms. Dickinson was drugged
12 and raped by Defendant Cosby.

13 57. The unfair and inaccurate depictions of Ms. Dickinson, and the false impressions
14 and implications created by the Defamatory Press Statements are highly offensive to a
15 reasonable person of ordinary sensibilities in Ms. Dickinson's position.

16 58. Upon information and belief, members of the community understood that the
17 statements were about Ms. Dickinson as the statements were about, concerning, and mentioned
18 Ms. Dickinson expressly.

19 59. The Defamatory Press Statements, and each of them, had a natural tendency to
20 injure Ms. Dickinson's reputation in the entertainment industry in which she works, and with
21 the public worldwide.

22 60. The Defamatory Press Statements were published by Defendant Cosby knowing
23 that they contained unfair and inaccurate depictions of Ms. Dickinson, and false implications
24 that would damage Ms. Dickinson's reputation in the community.

25 61. Defendant Cosby knows that he drugged and raped Ms. Dickinson. He knew that
26 implying that her claims were new and/or lies put Ms. Dickinson in a false light.

27 62. In the alternative, the false implications, and each of them, contained in the
28 Defamatory Press Statements were published with reckless disregard as to their truth or falsity.

1 she had just truthfully disclosed her experience of having been drugged and raped by him
2 was extreme and outrageous conduct that no reasonable person in a civilized society should
3 be expected to endure.

4 70. Defendant Cosby's choice to joke about drugging women's drinks in a
5 comedy show after the disclosure by Ms. Dickinson and many other women that he had
6 done so and then raped them, causing them pain, suffering and trauma, was further extreme
7 and outrageous conduct that no reasonable person in a civilized society should be forced to
8 endure.

9 71. In committing the intentional and outrageous acts described more fully above,
10 Defendant Cosby intended to cause Ms. Dickinson severe emotional distress and/or Defendant
11 Cosby acted with reckless disregard for the probability of inflicting humiliation, mental anguish,
12 and severe emotional distress on Ms. Dickinson.

13 72. As a direct and proximate cause of Defendant Cosby's conduct, Ms. Dickinson
14 has suffered and will continue to suffer humiliation, mental anguish, severe emotional distress,
15 and other special and general damages according to proof.

16 73. The extreme and outrageous conduct of Defendants, and each of them, as alleged
17 herein, was malicious, despicable, or oppressive in that Defendants, and each of them, acted
18 with full knowledge of the consequences to Ms. Dickinson as alleged herein, with the intent to
19 discredit her, harm her reputation, harass, or retaliate against Ms. Dickinson with a willful,
20 conscious, wanton, and reckless disregard for her rights and for the deleterious consequences
21 and cruel and unjust hardship resulting to Ms. Dickinson from the conduct of Defendants.
22 Accordingly, Ms. Dickinson is entitled to punitive damages in an amount to be proven at trial.

23 **PRAYER**

24 WHEREFORE, Ms. Dickinson prays for judgment against Defendants as follows:

- 25 1. For general damages according to proof at trial;
- 26 2. For special damages according to proof at trial;
- 27 3. For presumed damages;
- 28 4. For punitive damages;

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- 5. For costs of suit incurred herein; and
- 6. For such other and further relief as the Court deems just and proper.


DEMAND FOR JURY TRIAL

Plaintiff Janice Dickinson hereby demands a trial by jury.

DATED: May 20, 2015

Respectfully submitted,

THE BLOOM FIRM

By: 
 Lisa Bloom
 Nadia Taghizadeh
 Attorneys for Plaintiff Janice Dickinson