

FOR COURT USE ONLY

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):  
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 ATTORNEY FOR (Name): **WILLIAM H. COSBY, JR.**

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES**  
 STREET ADDRESS: **111 N. Hill Street**  
 MAILING ADDRESS:  
 CITY AND ZIP CODE: **Los Angeles, CA 90012**  
 BRANCH NAME: **CENTRAL DISTRICT - Stanley Mosk Courthouse**

PLAINTIFF/PETITIONER: **JANICE DICKINSON**  
 DEFENDANT/RESPONDENT: **WILLIAM H. COSBY, JR.**

**CASE MANAGEMENT STATEMENT**  
 (Check one):  **UNLIMITED CASE**  **LIMITED CASE**  
 (Amount demanded exceeds \$25,000) (Amount demanded is \$25,000 or less)

CASE NUMBER:  
**BC 580909**

A **CASE MANAGEMENT CONFERENCE** is scheduled as follows:  
 Date: **September 2, 2015** Time: **8:30 A.M.** Dept.: **47** Div.: Room:  
 Address of court (if different from the address above):  
 **Notice of Intent to Appear by Telephone, by (name): ROBERT P. LoBUE (Pro Hac Vice)**

**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): **Defendant William H. Cosby, Jr.**
  - b.  This statement is submitted jointly by parties (names):
2. **Complaint and cross-complaint (to be answered by plaintiffs and cross-complainants only)**
  - a. The complaint was filed on (date):
  - 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):  
**Complaint for (1) Defamation; (2) False Light, (3) Intentional Infliction of Emotional Distress based on statements in a privileged pre-litigation demand letter and related statement by litigation counsel. Defendant filed an anti-SLAPP motion (CCP Section 425.16), set for hearing on 10/15/15.**

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PLAINTIFF/PETITIONER: <b>JANICE DICKINSON</b>	CASE NUMBER: <b>BC 580909</b>
DEFENDANT/RESPONDENT: <b>WILLIAM H. COSBY, JR.</b>	

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.)

Plaintiff alleges that she was defamed by statements in a pre-litigation demand letter and related statement by Defendant's litigation counsel. Defendant contends the alleged statements are privileged (Civil Code § 47), were not made with Constitutional malice, and that Plaintiff cannot prove injury to reputation for truthfulness.

(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): Defendant requests nonjury trial.  
Plaintiff has requested 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): Defendant filed an anti-SLAPP motion (CCP § 425.16), set for hearing on 10/15/15. Demurrer is set for hearing on 11/2/15. All discovery is stayed pursuant to CCP § 425.16(g).
- c. Dates on which parties or attorneys will not be available for trial (specify dates and explain reasons for unavailability):  
12/22/15 - 1/4/16 - Trial counsel family vacation.  
12/22/15 - 1/3/16 - Defendant unavailable.

7. **Estimated length of trial**

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

- a.  days (specify number): **Five (5)**
- 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: **ROBERT P. LOBUE (New York Bar No. 1530039)**
- b. Firm: **PATTERSON BELKNAP WEBB & TYLER LLP**
- c. Address: **1133 Avenue of the Americas, New York, NY 10036**
- d. Telephone number: **(212) 336-2000**
- e. E-mail address: **rplobue@pbwt.com**
- f. Fax number: **(212) 336-2222**
- g. Party represented: **Defendant**

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):

WILLIAM H. COSBY, JR.

PLAINTIFF/PETITIONER: <b>JANICE DICKINSON</b> DEFENDANT/RESPONDENT: <b>WILLIAM H. COSBY, JR.</b>	CASE NUMBER: <b>BC 580909</b>
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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 <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 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> ):

PLAINTIFF/PETITIONER: JANICE DICKINSON	CASE NUMBER:
DEFENDANT/RESPONDENT: WILLIAM H. COSBY, JR.	BC 580909

11. Insurance

- a.  Insurance carrier, if any, for party filing this statement (name): **AIG; Fireman's Fund**
- b. Reservation of rights:  Yes  No
- c.  Coverage issues will significantly affect resolution of this case (explain):

**A Complaint for Declaratory Relief was filed on 6/26/15 in U.S. District Court captioned AIG Property Casualty Co. v. William H. Cosby and Janice Dickinson, USDC Case No. 2:15-cv-04842-BRO-RAO.**

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:
  - (2) Name of court:
  - (3) Case number:
  - (4) Status:

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):

15. Other motions

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

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>
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**All discovery is stayed pursuant to CCP § 425.16(g)**

- c.  The following discovery issues, including issues regarding the discovery of electronically stored information, are anticipated (specify):

**All discovery is stayed pursuant to CCP Section 425.16(g).**

PLAINTIFF/PETITIONER: <b>JANICE DICKINSON</b>	CASE NUMBER:
DEFENDANT/RESPONDENT: <b>WILLIAM H. COSBY, JR.</b>	<b>BC 580909</b>

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): **All discovery is stayed pursuant to CCP Section 425.16(g). Defendant's anti-SLAPP motion is set for hearing in this Department on 10/15/15. Defendant's Demurrer (which will be moot if the anti-SLAPP motion is granted) is set for hearing on 11/2/15. It would therefore be premature to set a trial date at this time.**

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):

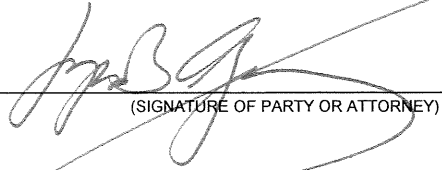
- b. After meeting and conferring as required by rule 3.724 of the California Rules of Court, the parties agree on the following (specify): §


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: August 18, 2015

LYNDA B. GOLDMAN  
(TYPE OR PRINT NAME)

▶   
(SIGNATURE OF PARTY OR ATTORNEY)

▶   
(SIGNATURE OF PARTY OR ATTORNEY)

(TYPE OR PRINT NAME)

Additional signatures are attached.

