

SERVICE COPY

1 **LYNDA B. GOLDMAN (SBN 119765)**
2 **ANDREW B. BRETTLER (SBN 262928)**
3 **LAVELY & SINGER**
4 **PROFESSIONAL CORPORATION**
5 2049 Century Park East, Suite 2400
6 Los Angeles, California 90067-2906
7 Telephone: (310) 556-3501
8 Facsimile: (310) 556-3615
9 Email: abrettler@lavelysinger.com

6 **ROBERT P. LOBUE (Pro Hac Vice)**
7 **PATTERSON BELKNAP WEBB & TYLER LLP**
8 1133 Avenue of the Americas
9 New York, NY 10036
10 Telephone: (212) 336-2000
11 Facsimile: (212) 336-2222
12 Email: rplobue@pbwt.com

10 Attorneys for Defendant
11 WILLIAM H. COSBY, JR.

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 FOR THE COUNTY OF LOS ANGELES - CENTRAL DISTRICT

15 JANICE DICKINSON, an individual,)
16 Plaintiff,)
17 v.)
18 WILLIAM H. COSBY, JR., an individual;)
19 and DOES 1 through 100, Inclusive,)
20 Defendants.)

CASE NO. BC 580909
[Hon. Debre Katz Weintraub - Dept. 47]
DEFENDANT WILLIAM H. COSBY, JR.'S OPPOSITION TO PLAINTIFF'S EX PARTE APPLICATION FOR:
(1) ORDER SHORTENING TIME TO HEAR PLAINTIFF'S MOTION TO LIFT STAY OF DISCOVERY IMPOSED BY CCP § 425.16(g); AND
(2) ORDER TO CONTINUE HEARING DATES RE DEFENDANT'S ANTI-SLAPP MOTION AND DEMURRER, AND RESPECTIVE DEADLINES FOR SUBMISSION OF PLAINTIFF'S BRIEFS IN OPPOSITION

DATE: September 21, 2015
TIME: 8:30 A.M.
DEPT.: 47

Complaint Filed: May 20, 2015

28

I.

INTRODUCTION

1
2
3
4 Plaintiff Janice Dickinson is inexplicably asking this Court to permit her to file on
5 shortened time a meritless motion she could have filed months ago on regular statutory notice to
6 ask the Court to lift the mandatory discovery stay imposed by Code of Civil Procedure
7 § 425.16(g). Without any good cause justifying Plaintiff’s untimely eleventh hour *ex parte*
8 application, she wants an expedited briefing schedule for a motion arguing that she ought to be
9 able to depose Defendant and his litigation attorney prior to the hearing on Defendant’s anti-
10 SLAPP Motion, notwithstanding the legislative intent of the anti-SLAPP statute prohibiting such
11 discovery in cases like this.

12 Ms. Dickinson used the national media as a platform to make outlandish accusations that
13 she had been assaulted more than 30 years ago by Defendant William H. Cosby, Jr. She
14 followed up those accusations up by filing this meritless defamation action against Mr. Cosby
15 after his litigation counsel responded to Ms. Dickinson’s accusations in a privileged pre-litigation
16 demand letter and related statement. On June 22, 2015, Mr. Cosby filed a Special Motion to
17 Strike Plaintiff’s Complaint pursuant to Code of Civil Procedure § 425.16 (“anti-SLAPP
18 Motion”) on the grounds that Ms. Dickinson’s specious claims fall within the scope of the anti-
19 SLAPP statute and should be stricken because she will be unable to meet her burden of
20 establishing a probability of success on the merits.

21 The anti-SLAPP motion was filed three months ago, on June 22, 2015, and it is set for
22 hearing on October 15, 2015. (Goldman Decl., ¶3.) Since that time, Plaintiff’s counsel have been
23 quite cognizant of Section 425.16(g)’s mandatory discovery stay in this case, as evidenced by a
24 letter from Plaintiff’s counsel on July 2, 2015, stating “...discovery proceedings have been stayed
25 upon Defendant’s filing of Notice of Special Motion to Strike Plaintiff’s Complaint.” (Goldman
26 Decl., ¶4, Exh. “A.”) Furthermore, over a month ago, Plaintiff’s counsel indicated that she might
27 move to lift the mandatory discovery stay, and Plaintiff’s CMC Statement filed back in mid-
28

1 August specifically identified a Motion to Lift Stay of Discovery as something she expected to
2 file. (Goldman Decl., ¶6, Exh. “B,” pg. 4.) Still, no such noticed motion was filed.

3 Meanwhile, since filing this lawsuit, Plaintiff’s counsel Lisa Bloom found the time to
4 make numerous national media appearances, including at least half a dozen to talk about this case
5 or Mr. Cosby. (Goldman Decl., ¶8, Exh. “C.”)

6 After Plaintiff’s counsel skipped attendance at the Case Management Conference on
7 September 2, 2015, they waited until now to rush in *ex parte* asking the Court to impose an
8 expedited briefing schedule on Defendant to oppose her dilatory motion asking the Court to lift
9 CCP § 425.16(g)’s mandatory discovery stay. (Goldman Decl., ¶7.)

10 Now, without any reasonable justification and without any good cause, Plaintiff is asking
11 for shortened time to hear a specious motion that could have been filed on proper statutory notice
12 a long time ago (if at all). It is a motion which, if filed, would lack any merit since Plaintiff will
13 be unable to demonstrate good cause to conduct discovery that would establish a *prima facie* case
14 of defamation, particularly since the alleged defamation is protected by the litigation privilege in
15 Civil Code § 47(b). The utter lack of merit to any motion seeking leave to depose Mr. Cosby and
16 Mr. Singer prior to the anti-SLAPP Motion being decided is further reason that the *ex parte*
17 application should be denied.

18 The purpose of the stay on discovery automatically imposed by CCP § 425.16(g) when an
19 anti-SLAPP motion is filed is to protect defendants from discovery burdens and to minimize
20 expense pending resolution of the motion. *Mattel, Inc. v. Luce, Forward, Hamilton & Scripps*,
21 99 Cal.App.4th 1179, 1189-90, 121 Cal.Rptr. 2d, 794, 801 (2002). Allowing Plaintiff to waltz
22 into Court now with an untimely motion to lift the discovery stay and to have it heard on
23 shortened time with a truncated briefing schedule would subvert those principles.

24 There are at least three attorneys working on this case at The Bloom Firm (Lisa Bloom,
25 Jivaka Candappa, and Nadia Taghizadeh). (Goldman Decl., ¶9.) A motion to lift the discovery
26 stay could have been filed long ago on regular statutory notice. The fact that Plaintiff is instead
27 applying *ex parte* at the eleventh hour thwarts Section 425.16(g)’s requirement for a noticed
28

1 motion based on good cause. The absence of good cause for the *ex parte* was pointed out by
2 defense counsel in a letter to Plaintiff's counsel. (Goldman Decl., ¶9, Exh. "D.")

3 It would be highly prejudicial to Defendant to grant Plaintiff's untimely *ex parte*
4 application, permitting her to file a delinquent motion to lift the mandatory discovery stay, and
5 setting an expedited briefing schedule on an issue of such great significance as permitting
6 discovery of Mr. Cosby and his litigation counsel. Plaintiff's application should be denied.

7
8 **II.**

9 **THERE IS NO GOOD CAUSE TO GRANT AN OST TO HEAR A MERITLESS**
10 **MOTION TO LIFT THE MANDATORY CCP § 425.16(g) DISCOVERY STAY OR TO**
11 **CONTINUE THE ANTI-SLAPP AND DEMURRER HEARINGS**

12
13 An Order Shortening Time must be "supported by a declaration showing good cause" for
14 the Order. California Rule of Court 3.1300(b). What is the "good cause" for Plaintiff's dilatory
15 application for shortened time? There is none.

16 After having the anti-SLAPP Motion in hand for three long months, and after first raising
17 the issue of seeking to lift the mandatory discovery stay more than a month ago, Plaintiff is
18 running into Court *ex parte* seeking an order shortening the time to hear a motion for leave to lift
19 the mandatory automatic discovery stay under Section 425.16(g)¹, and to delay the hearings on
20 Defendant's anti-SLAPP Motion and Demurrer because she wants to depose Mr. Cosby and his
21 litigation counsel.

22 An *ex parte* applicant "must make an affirmative factual showing in a declaration
23 containing competent testimony based on personal knowledge of irreparable harm, immediate
24 danger, or any other statutory basis for granting relief *ex parte*." California Rule of Court

25
26 ¹Code of Civil Procedure § 425.16(g) provides:

27 "All discovery proceedings in the action shall be stayed upon the filing of a notice of
28 motion made pursuant to this section. The stay of discovery shall remain in effect until notice of
entry of the order ruling on the motion. The court, on noticed motion and for good cause shown,
may order that specified discovery be conducted notwithstanding this subdivision." (Emph.
added.)

1 3.1202(c). Here, there is no valid basis justifying the requested relief. Since filing this lawsuit,
2 Plaintiff's counsel has found the time to make her case in the press and to chat with the media.
3 (Goldman Decl., ¶8, Exh. "C.") Her failure to get around to filing a motion sooner is not "good
4 cause" *ex parte* relief, particularly when she is attempting to shoehorn her way into Court to lift
5 Section 425.16(g)'s mandatory discovery stay so that she can take impermissible depositions of
6 Mr. Cosby and his litigation counsel.

7 Long before now, Plaintiff's counsel could have easily filed a *properly noticed motion*
8 seeking to lift the discovery stay. The Bloom Firm has three lawyers working on this case.
9 (Goldman Decl., ¶9.) They pointed out the mandatory discovery stay back on July 2nd. (Goldman
10 Decl., ¶4, Exh. "A.") They have been thinking about filing a motion to lift the discovery stay for
11 at least a month. (Goldman Decl., ¶¶5-6, 10, Exh. "B.") They have had the luxury of literally
12 having months so far to prepare opposition to the anti-SLAPP Motion. (Goldman Decl., ¶3.) By
13 the time their anti-SLAPP opposition is due, Plaintiff's counsel will have had *more than 100*
14 *days* to work on the opposition.

15 In *Tutor-Saliba v. Herrera*, the court properly denied an *ex parte* application to lift the
16 discovery stay when the plaintiff waited four months after an anti-SLAPP motion was filed
17 before bringing the application, and the anti-SLAPP motion argued that the alleged defamatory
18 statements were absolutely privileged under Civil Code § 47. *Tutor-Saliba Corp. v. Herrera*,
19 136 Cal. App. 4th 604 (2006). Similar to Ms. Dickinson, the plaintiff in *Tutor-Saliba* made an *ex*
20 *parte* application four months after the anti-SLAPP motion was filed, seeking leave to conduct
21 discovery before opposing plaintiff's anti-SLAPP motion. That *ex parte* application was denied
22 and the anti-SLAPP motion was granted. The court of appeal held that the trial court did not
23 abuse its discretion in denying plaintiff's discovery request due to lack of timeliness and because
24 plaintiff failed to make a good cause showing that the discovery sought would overcome the
25 privilege and establish a prima face case for defamation. *Tutor-Saliba, supra*, 136 Cal. App. 4th at
26 617-18. This Court should likewise deny Plaintiff's *ex parte* application for the same reasons.

27 Under these circumstances, there is no good cause for the requested relief, and it would
28 be highly prejudicial and unfair to grant the *ex parte*, to allow Plaintiff to file her motion to lift

1 the discovery stay, and to deprive Defendant of statutory time to prepare opposition to a motion
2 that could potentially have such significant consequences subverting the legislative goal of
3 protecting defendants from being required to engage in discovery in a meritless SLAPP case.

4 Indeed, “not only did the Legislature desire early resolution to minimize the potential
5 costs of protracted litigation, it also sought to protect defendants from the burden of traditional
6 discovery pending resolution of the motion.” *Mattel, Inc. v. Luce, Forward, Hamilton & Scripps*,
7 99 Cal.App.4th 1179, 1189-90 (2002). Granting Plaintiff’s *ex parte* application would be
8 counter to the legislative protections put in place to prevent burdensome discovery while an anti-
9 SLAPP motion is pending. The fact that Section 425.16(g) expressly requires a *noticed motion*
10 and a *showing of good cause* before allowing discovery underscores why it would be
11 inappropriate to allow Plaintiff to squeeze in her requested motion to lift the discovery stay.

12 The Court may permit discovery only “[i]f the plaintiff makes a timely and proper
13 showing in response to the motion to strike, that a defendant or witness possesses evidence
14 needed by plaintiff to establish a *prima facie* case” *Lafayette Morehouse, Inc. v. The*
15 *Chronicle Publishing Co.*, 37 Cal.App.4th 855, 868 (1995). Accordingly, if Plaintiff is permitted
16 to file her untimely motion to lift the discovery stay, her attempt to obtain permission to depose
17 Mr. Cosby and his litigation attorney would nevertheless fail on the merits given that Plaintiff
18 failed to act in a timely manner and would be unable to make a proper showing justifying the
19 discovery to oppose the anti-SLAPP Motion. Defendant should not be put to the burden of
20 opposing such a motion, however.

21 Importantly, in order to serve the legislative intent of the anti-SLAPP statute, it is
22 inappropriate to be lenient in ruling on requests to allow discovery since the legislative intent
23 underlying the anti-SLAPP statute requires a plaintiff to have evidence that her claim is viable
24 *before she files suit. See, e.g., Ludwig v. Sup. Ct.*, 37 Cal.App.4th 8, 16 (1995) (“an
25 overly-lenient standard would be wholly inappropriate, given that the statute is intended to
26 ‘provid[e] a fast and inexpensive unmasking and dismissal of SLAPP’s.’ * * * The legislative
27 intent is best served by an interpretation which would require a plaintiff to marshal facts
28 sufficient to show the viability of the action *before* filing a SLAPP suit.”), *quoting Wilcox v. Sup.*

1 Ct., 27 Cal.App.4th 809, 823 (1994). Here, Plaintiff is attempting to subvert the anti-SLAPP
2 statute’s legislative intent by asking this Court to allow her to file a dilatory motion with an
3 expedited briefing schedule pushing for impermissible discovery.

4 The Court may permit discovery only “[i]f the plaintiff makes a timely and proper
5 showing in response to the motion to strike, that a defendant or witness possesses evidence
6 needed by plaintiff to establish a prima facie case....” *Lafayette Morehouse, Inc. v. The Chronicle*
7 *Publishing Co.*, 37 Cal.App.4th 855, 868 (1995). If Plaintiff is permitted to file her specious
8 motion, she will be unable to meet that burden. *See, e.g., Tutor-Saliba, supra*, 136 Cal.App.4th
9 at 618 (court properly refused to allow discovery to establish *prima facie* case of defamation
10 where alleged defamation was absolutely privileged); *Sipple v. Foundation For Nat'l Progress*,
11 71 Cal.App.4th 226, 247 (1999) (discovery is not permitted for the purpose of “testing” the
12 declarations submitted by defendants supporting anti-SLAPP motion); *1-800 Contacts, Inc. v.*
13 *Steinberg*, 107 Cal.App.4th 568, 593 (2003) (good cause for discovery should include facts
14 plaintiff expects to uncover; “Discovery may not be obtained merely to ‘test’ the opponent’s
15 declarations.”).

16 The anti-SLAPP Statute was enacted so that courts could “dismiss at an early stage
17 nonmeritorious litigation meant to chill the valid exercise of the constitutional rights of freedom
18 of speech and petition in connection with a public issue.” *Sipple*, 71 Cal.App.4th at 235.
19 Accordingly, the anti-SLAPP Motion should be heard as scheduled on October 15, 2015 without
20 first hearing a motion seeking to lift Section 425.16(g)’s mandatory discovery stay.

21
22 **III.**

23 **CONCLUSION**

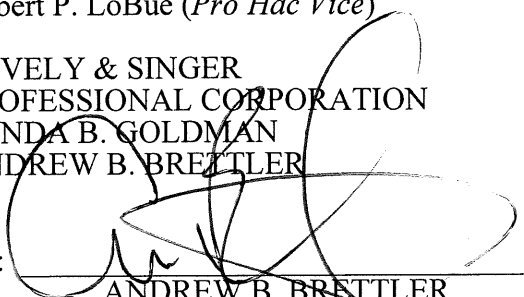
24
25 There is no good cause for the requested *ex parte* relief. It would be inequitable and
26 highly prejudicial to allow Plaintiff to bring a motion to lift the discovery stay at the eleventh
27 hour, especially since Plaintiff had months to do so on proper notice. Moreover, imposing an
28 expedited and shortened briefing schedule on Defendant for an issue of such great significance

1 would be highly prejudicial. Accordingly, Plaintiff's *Ex Parte* Application for an OST to hear
2 Plaintiff's Motion to Lift Stay of Discovery, and to continue the hearing dates on Defendant's
3 anti-SLAPP Motion and Demurrer should be denied.

4
5 DATED: September 21, 2015

PATTERSON BELKNAP WEBB & TYLER LLP
Robert P. LoBue (*Pro Hac Vice*)

6
7 LVELY & SINGER
PROFESSIONAL CORPORATION
8 LYNDA B. GOLDMAN
ANDREW B. BRETTLER

9
10 By: 
11 ANDREW B. BRETTLER
12 Attorneys for Defendant WILLIAM H. COSBY, JR.

13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **DECLARATION OF LYNDA B. GOLDMAN**

2 I, Lynda B. Goldman, declare and state:

3 1. I am an attorney at law licensed to practice before all of the courts in the State of
4 California, and am a member of Lavelly & Singer Professional Corporation, counsel of record for
5 William H. Cosby, Jr. (“Defendant”), Defendant herein. The facts stated herein are of my own
6 personal knowledge and, if called and sworn as a witness, I could and would competently testify
7 thereto. As to those matters stated on the basis of information and belief, I am so informed and
8 believe those matters to be true.

9 2. There is no good cause to permit Plaintiff to file a motion seeking leave to lift the
10 mandatory discovery stay pursuant to Code of Civil Procedure, § 425.16(g) seeking to permit
11 Plaintiff to depose Mr. Cosby and his litigation counsel, Martin D. Singer, nor is there good
12 cause to set the hearing on that motion on shortened time with an expedited briefing schedule.
13 Nor is there good cause to continue the hearings on Defendant’s Anti-SLAPP Motion and
14 Demurrer.

15 3. On June 22, 2015, I caused to be filed with this Court Defendant’s Special Motion
16 to Strike Plaintiff’s Complaint pursuant to Code of Civil Procedure, § 425.16 (“anti-SLAPP
17 Motion”), as well as Defendant’s Demurrer to Plaintiff’s Complaint. The hearing on the anti-
18 SLAPP Motion was initially scheduled for October 6, 2015. The hearing date was subsequently
19 continued to October 15, 2015 after the case was transferred to Department 47. The hearing on
20 Defendant’s Demurrer is currently set for November 2, 2015.

21 4. Plaintiff’s counsel have been cognizant of Section 425.16(g)’s mandatory
22 discovery stay in this action since at least July 2, 2015, as evidenced by a letter of that date I
23 received from Nadia Taghizadeh of The Bloom Firm withdrawing a subpoena and stating
24 “...discovery proceedings have been stayed upon Defendant’s filing of Notice of Special Motion
25 to Strike Plaintiff’s Complaint.” A true and correct copy of that letter is attached hereto as
26 Exhibit “A.” Following that July 2, 2015 letter, no noticed motion seeking to lift the discovery
27 stay was filed.
28

1 5. Approximately one month ago, on August 17, 2015, co-counsel Robert P. LoBue
2 and I had a telephonic meet-and-confer discussion with Ms. Taghizadeh regarding the Case
3 Management Conference. Ms. Taghizadeh asked whether Defendant would stipulate to lift the
4 CCP § 425.16(g) discovery stay. I informed Ms. Taghizadeh that we would not stipulate to lift
5 the mandatory discovery stay. Among other reasons, I noted the purpose and policy for the
6 mandatory stay of discovery provided by Sub-section (g) of CCP § 425.16. During that telephone
7 conversation, Ms. Taghizadeh indicated that Plaintiff might bring a motion seeking to lift the
8 discovery stay.

9 6. Attached hereto as Exhibit "B" is a true and correct copy of Plaintiff's Case
10 Management Statement served on August 18, 2015. On page 4, it identifies "Plaintiff's Motion
11 to Lift Stay of Discovery" as a motion that the Plaintiff expected to file. No such motion was
12 filed, however.

13 7. During the telephonic meet-and-confer on August 17, 2015, Mr. LoBue asked Ms.
14 Taghizadeh whether she would stipulate to postpone the then upcoming Case Management
15 Conference until after the hearing on the anti-SLAPP Motion, so that the parties could avoid the
16 time and expense of an unnecessary court appearance. Ms. Taghizadeh said that she would get
17 back to us later in the week after conferring with Lisa Bloom. She did not do so. My partner,
18 Andrew B. Brettler, therefore appeared at the Case Management Conference on September 2,
19 2015, and Mr. LoBue appeared telephonically. There was no appearance at the Case
20 Management Conference by Plaintiff's counsel.

21 8. Attached hereto as Exhibit "C" are true and correct copies of materials published
22 on the "MEDIA APPEARANCES" page of The Bloom Firm's website at the following URL's:

23 <http://www.thebloomfirm.com/media-appearances/>

24 <http://www.thebloomfirm.com/media-appearances/page/2/>

25 These materials state that they are "a few examples" of Ms. Bloom's national media appearances,
26 and they include more than a dozen appearances since the anti-SLAPP Motion was filed, at least
27 17 appearances since the Complaint was filed, and includes at least half a dozen appearances to
28 talk about Mr. Cosby and/or this case specifically.


1 9. Attached hereto as Exhibit "D" is a true and correct copy of my letter dated
2 September 17, 2015 to Jivaka Candappa, Esq. of The Bloom Firm informing him the Defendant
3 would oppose Plaintiff's instant *ex parte* application. Mr. Candappa is one of three attorneys I
4 am aware have been working on this case at The Bloom Firm (Lisa Bloom, Jivaka Candappa, and
5 Nadia Taghizadeh).

6 10. Plaintiff was served with the anti-SLAPP Motion three months ago, and one
7 month ago Plaintiff's counsel specifically indicated that Plaintiff was been considering bringing a
8 motion to lift the discovery stay. Accordingly, there is no good cause to permit Plaintiff to file
9 the motion at this late date and to burden Defendant with the time and expense of opposing it.
10 Nor is there good cause to set such a motion for hearing on shortened time, prejudicing
11 Defendant by depriving him of the statutory time to prepare opposition to a motion that could
12 have been filed months ago and heard on regular statutory notice. It would be highly prejudicial
13 to permit Plaintiff to file the motion, and to limit Defendant to an expedited briefing schedule to
14 oppose a significant motion seeking to lift the discovery stay.

15
16 I declare under penalty of perjury under the laws of the State of California that the
17 foregoing is true and correct.

18 Executed this 21st day of September, 2015, at Los Angeles, California.

19
20
21
22
23
24
25
26
27
28


LYNDA B. GOLDMAN

^{T H E}
BLOOMFIRM
Attorneys at Law

July 2, 2015

VIA U.S. MAIL AND READ RECEIPT E-MAIL:

Robert P. LoBue
John P. Schmitt
Patterson Belknap Webb & Tyler LLP
1133 Avenue of the Americas
New York, New York 10036
RPLoBue@PBWT.com
JPSchmitt@PBWT.com

Lynda B. Goldman, Esq.
Lavelly & Singer P.C.
2049 Century Park East, Suite 2400
Los Angeles, CA 90067
LGoldman@Lavelysinger.com

Re: *Janice Dickinson v. William H. Cosby, Jr.*, LASC # BC 580909

Dear Counsel:

As discovery proceedings have been stayed upon Defendant's filing of Notice of Special Motion to Strike Plaintiff's Complaint, Plaintiff withdraws the Deposition Subpoenas for Production of Business Records to Momentous Insurance requesting copies of Defendant's insurance policies.

If you have any questions, please do not hesitate to contact our office.

Very truly yours,

THE BLOOM LAW FIRM
A Professional Corporation

Nadia Taghizadeh
NADIA TAGHIZADEH
Attorney at Law

<p>ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):</p> <p>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) 917-7314 FAX NO. (Optional): (866) 852-5666 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): Plaintiff, Janice Dickinson</p>	<p>FOR COURT USE ONLY</p>
<p>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</p>	
<p>PLAINTIFF/PETITIONER: Janice Dickinson DEFENDANT/RESPONDENT: William H. Cosby, Jr.</p>	
<p style="text-align: center;">CASE MANAGEMENT STATEMENT</p> <p>(Check one): <input checked="" type="checkbox"/> UNLIMITED CASE (Amount demanded exceeds \$25,000) <input type="checkbox"/> LIMITED CASE (Amount demanded is \$25,000 or less)</p>	<p>CASE NUMBER: BC580909</p>
<p>A CASE MANAGEMENT CONFERENCE is scheduled as follows:</p> <p>Date: Septemehr 2, 2015 Time: 8:30 AM Dept.: 47 Div.: Room:</p> <p>Address of court (if different from the address above):</p> <p><input type="checkbox"/> Notice of Intent to Appear by Telephone, by (name):</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): Janice Dickinson
 - 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): May 20, 2015
 - 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 has brought claims for defamation, false light, and intentional infliction of emotional distress against Defendant.

PLAINTIFF/PETITIONER: Janice Dickinson	CASE NUMBER: BC580909
DEFENDANT/RESPONDENT: William H. Cosby, Jr.	

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.)*
- In 1982, Defendant raped Plaintiff. Plaintiff recounted this incident in a TV interview on November 18, 2014. Defendant maliciously sent a letter that day to several media outlets declaring Plaintiff a liar. The next day, Defendant maliciously issued a mirroring statement to the media. These statements were false. Plaintiff has suffered reputation-based, emotional and economic damages.

(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)*:

This case will be ready for trial no sooner than one year following the lift of the discovery stay.

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)*: 6-8

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. E-mail 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 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: Janice Dickinson DEFENDANT/RESPONDENT: William H. Cosby, Jr.	CASE NUMBER: BC580909
---	--------------------------

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 checked="" type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input checked="" 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: BC580909
DEFENDANT/RESPONDENT: William H. Cosby, Jr.	

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: AIG Property Casualty Company v. William H. Cosby and Janice Dickinson
 - (2) Name of court: United States District Court, Central District of California, Western Division
 - (3) Case number: 2:15-cv-04842
 - (4) Status: Complaint Filed
- 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*):
Plaintiff's Motion to Lift Stay of Discovery - the Defendant's Anti-SLAPP motion has stayed discovery until at least October 15. Thereafter, other discovery issues are anticipated due to the sensitive nature of this case.

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> |
|--------------|--------------------|-------------|
|--------------|--------------------|-------------|

- c. The following discovery issues, including issues regarding the discovery of electronically stored information, are anticipated (*specify*):
 On account of Defendant's pending Anti-SLAPP motion, discovery has been stayed. Plaintiff anticipates several discovery issues due to the sensitive nature of the facts and underlying claims. The anticipated discovery issues have yet to materialize due to the discovery stay.

PLAINTIFF/PETITIONER: Janice Dickinson	CASE NUMBER: BC580909
DEFENDANT/RESPONDENT: William H. Cosby, Jr.	

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

- a. The party or parties request that the following additional matters be considered or determined at the case management conference (specify):
Given the current stay on discovery, we are looking at a potential trial date as late as 2017. A lifting of the discovery stay would allow for an earlier resolution of this matter.

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):

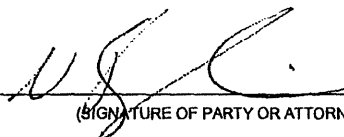
20. Total number of pages attached (if any): _____

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: 8/18/2015

Nadia Taghizadeh

(TYPE OR PRINT NAME)

▶ 

(SIGNATURE OF PARTY OR ATTORNEY)

(TYPE OR PRINT NAME)

▶ _____
(SIGNATURE OF PARTY OR ATTORNEY)

Additional signatures are attached.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

PROOF OF SERVICE
JANICE DICKINSON v. WILLIAM H. COSBY, JR.
LASC No: BC 580909

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 20700 Ventura Blvd., Suite 301, Woodland Hills, CA 91364.

On August 18, 2015, I served the following document(s) described as: CASE MANAGEMENT STATEMENT on the interested parties in this action by placing a true and correct copy in an enclosed sealed envelope as follows:

Attorneys for Defendant;

Lynda B. Goldman, Esq.
Lavelly & Singer P.C.
2049 Century Park East, Suite 2400
Los Angeles, California 90067
Tel: (310) 556-3501
Fax: (310) 557-3615

Robert P. LoBue, Esq.
John P. Schmitt, Esq.
Patterson Belknap Webb & Tyler LLP
1133 Avenue of the Americas
New York, New York 10036
Tel: (212) 336-2000
Fax: (212) 336-2222

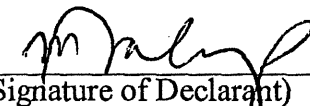
U.S. MAIL I am readily familiar with the firm's practice of collection and processing correspondence by mailing. Under that same practice it would be deposited with U.S. Postal Service on that same day with postage fully prepaid at Los Angeles, California in the ordinary course of business. Following that practice, I placed the foregoing document(s) for deposit and mailing in the United States Postal Service that same day with postage prepaid, sealed and addressed as set forth above, in the ordinary course of business.

BY FACSIMILE TRANSMISSION I caused the said document(s) to be transmitted to the office or residence of the addressee at the above referenced facsimile number.

STATE I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on August 18, 2015 at Los Angeles, California.

Marcelino Valencap
(Print or Type Name)


(Signature of Declarant)

THE BLOOM FIRM
21100 W. WASHINGTON AVE
SUITE 200
MILWAUKEE, WI 53227

[\(888\) 962-5666](tel:(888)962-5666)

Call for a Free Case Evaluation

MEDIA APPEARANCES

THE BLOOM FIRM
21100 W. WASHINGTON AVE
SUITE 200
MILWAUKEE, WI 53227

Toggle navigation

- [Home](#)
- [Our Firm](#)
- [Practice Areas](#)
- [Media Appearances](#)
- [News & Press](#)
- [Praise for The Bloom Firm](#)
- [Lisa's Blog](#)
- [Contact](#)
 - [Free Consultation](#)
 - [Media Contact](#)
- (888) 962-5666

Lisa Bloom appears on national television and radio commenting on every national issue in America. Here are a few examples.



[The Bloom Firm Media Appearances](#) August 27, 2015

[Lisa Bloom: Prep school rape suspect's answers 'strained credibility' on The Today Show](#)



[The Bloom Firm Media Appearances](#) August 26, 2015

[Lisa Bloom: Defendant in St. Paul's rape trial must try 'to be liked' on the Today Show](#)



[The Bloom Firm Media Appearances](#) August 25, 2015

[Lisa Bloom: Prep school suspect's friends may have damaged his case on The Today Show](#)



[The Bloom Firm Media Appearances](#) August 3, 2015

[Lisa discusses about how even though Sam Dubose's bottle did not contain alcohol, it was irrelevant to his shooting on Dr. Drew](#)



[The Bloom Firm Media Appearances](#) July 31, 2015

[Lisa Bloom discusses that Walter Palmer could claim he's subject of 'witch hunt' on the Today Show](#)



[The Bloom Firm Media Appearances](#) July 30, 2015

[Lisa discusses if dentist Walter Palmer face charges in US or Zimbabwe on the today Show](#)



[The Bloom Firm Media Appearances](#) July 20, 2015

[Lisa Explains the Importance of Identifying Rape on Dr. Drew](#)



[The Bloom Firm Media Appearances](#) July 13, 2015

[Lisa explains why Cosby's victims waited to come forward on Dr. Drew](#)



[The Bloom Firm Media Appearances](#) July 8, 2015

[Lisa Bloom with Client Janice Dickinson on CNN Discussing Bill Cosby's Quaaludes Admission](#)



[The Bloom Firm Media Appearances](#) July 7, 2015

[Lisa Bloom with Client Janice Dickinson on ET Discussing Bill Cosby's Quaaludes Admission](#)

1234

[The Bloom Firm Social Media](#)

[Lisa Bloom Social Media](#)

[The Bloom Firm Newsletter](#)

Sign up to get interesting news and updates delivered to your inbox.

[Sign Up Now](#)

For Email Marketing you can trust.

Recent Posts

- [Dehumanizing transgender people with one simple trick](#)
by admin in [The Bloom Firm Media Appearances](#)
- [Kim Davis and the limits of religious freedom](#)
by admin in [The Bloom Firm Media Appearances](#)
- [Lisa Bloom: Prep school rape suspect's answers 'strained credulity' on The Today Show](#)
by admin in [The Bloom Firm Media Appearances](#)
- [Lisa Bloom: Defendant in St. Paul's rape trial must try 'to be liked' on the Today Show](#)
by admin in [The Bloom Firm Media Appearances](#)
- [What the St. Paul's rape case teaches us](#)
by admin in [The Bloom Firm Media Appearances](#)
- [Lisa Bloom: Prep school suspect's friends may have damaged his case on The Today Show](#)
by admin in [The Bloom Firm Media Appearances](#)
- [Your legal rights to protest, explained](#)
by admin in [The Bloom Firm Media Appearances](#)
- [Lisa discusses about how even though Sam Dubose's bottle did not contain alcohol, it was irrelevant to his shooting on Dr. Drew](#)
by admin in [The Bloom Firm Media Appearances](#)
- [Lisa Bloom discusses that Walter Palmer could claim he's subject of 'witch hunt' on the Today Show](#)
by admin in [The Bloom Firm Media Appearances](#)
- [Lisa discusses if dentist Walter Palmer face charges in US or Zimbabwe on the today Show](#)
by admin in [The Bloom Firm Media Appearances](#)

© 2015 All Rights Reserved. The Bloom Firm



(888) 962-5666 (TEL:+18889625666)

CALL FOR A FREE CASE EVALUATION

(http://www.thebloomfirm.com)

MEDIA APPEARANCES

Lisa Bloom appears on national television and radio commenting on every national issue in America. Here are a few examples.

Type term and search



(http://www.thebloomfirm.com/lisa-bloom-on-the-today-show-discussing-prison-escapee-david-sweat/)

The Bloom Firm Media Appearances (http://www.thebloomfirm.com/category/the-bloom-firm-media-appearances/)

June 30, 2015

Lisa Bloom on The Today Show Discussing Prison Escapee David Sweat

(http://www.thebloomfirm.com/lisa-bloom-on-the-today-show-discussing-prison-escapee-david-sweat/)

(http://www.thebloomfirm.com/lisa-bloom-on-the-today-show-discussing-prison-escapee-david-sweat/)

THE BLOOM FIRM SOCIAL MEDIA

(http://www.twitter.com/)

(http://www.facebook.com/)

(https://plus.google.com/)

(https://instagram.com/)



(http://www.thebloomfirm.com/lisa-bloom-on-hlns-dr-drew-discussing-the-impact-of-the-n-word/)

The Bloom Firm Media Appearances (http://www.thebloomfirm.com/category/the-bloom-firm-media-appearances/)

June 24, 2015

Lisa Bloom on HLN's Dr. Drew Discussing the Impact of the N-Word

(http://www.thebloomfirm.com/lisa-bloom-on-hlns-dr-drew-discussing-the-impact-of-the-n-word/)

(http://www.thebloomfirm.com/lisa-bloom-on-hlns-dr-drew-discussing-the-impact-of-the-n-word/)

LISABLOOM SOCIAL MEDIA

(https://twitter.com/)

(https://www.facebook.com/)

(https://instagram.com/)

THE BLOOM FIRM NEWSLETTER

Sign up to get interesting news and updates delivered to your inbox.

Sign Up Now (http://visitor.r20.constantcontact.com/llr=4hqhtfuab&p=oi&m=11211744053758e591-4be8-9695-54c55)



(<http://www.thebloomfirm.com/lisa-bloom-on-pix11-discussing-racism-in-america/>)

The Bloom Firm Media Appearances (<http://www.thebloomfirm.com/category/the-bloom-firm-media-appearances/>)

June 23, 2015

[Lisa Bloom on Pix11 Discussing Racism in America](http://www.thebloomfirm.com/lisa-bloom-on-pix11-discussing-racism-in-america/)

(<http://www.thebloomfirm.com/lisa-bloom-on-pix11-discussing-racism-in-america/>)

(<http://www.thebloomfirm.com/lisa-bloom-on-pix11-discussing-racism-in-america/>)



(<http://www.thebloomfirm.com/lisa-bloom-discusses-gun-control-on-hlns-dr-drew/>)

The Bloom Firm Media Appearances (<http://www.thebloomfirm.com/category/the-bloom-firm-media-appearances/>)

June 18, 2015

[Lisa Bloom Discusses Gun Control on HLN's Dr. Drew](http://www.thebloomfirm.com/lisa-bloom-discusses-gun-control-on-hlns-dr-drew/)

(<http://www.thebloomfirm.com/lisa-bloom-discusses-gun-control-on-hlns-dr-drew/>)

(<http://www.thebloomfirm.com/lisa-bloom-discusses-gun-control-on-hlns-dr-drew/>)



(<http://www.thebloomfirm.com/lisa-bloom-with-client-janice-dickinson-on-entertainment-tonight-discussing-lawsuit-against-bill-cosby/>)

The Bloom Firm Media Appearances (<http://www.thebloomfirm.com/category/the-bloom-firm-media-appearances/>)

May 21, 2015

[Lisa Bloom with Client Janice Dickinson on Entertainment Tonight Discussing Lawsuit Against Bill Cosby](http://www.thebloomfirm.com/lisa-bloom-with-client-janice-dickinson-on-entertainment-tonight-discussing-lawsuit-against-bill-cosby/)

(<http://www.thebloomfirm.com/lisa-bloom-with-client-janice-dickinson-on-entertainment-tonight-discussing-lawsuit-against-bill-cosby/>)

For Email Marketing you can trust.

RECENTPOSTS

Dehumanizing transgender people with one simple trick

by admin in The Bloom Firm Media Appearances

(<http://www.thebloomfirm.com/dehumanizing-transgender-people-with-one-simple-trick/>)

Kim Davis and the limits of religious freedom

by admin in The Bloom Firm Media Appearances

(<http://www.thebloomfirm.com/kim-davis-and-the-limits-of-religious-freedom/>)

Lisa Bloom: Prep school rape suspects answers 'strained credulity' on The Today Show

by admin in The Bloom Firm Media Appearances

(<http://www.thebloomfirm.com/august-27th-2015-lisa-bloom-prep-school-rape-suspects-answers-strained-credulity-on-the-today-show/>)

Lisa Bloom: Defendant in St. Paul's rape trial must try 'to be liked' on the Today Show

by admin in The Bloom Firm Media Appearances

(<http://www.thebloomfirm.com/lisa-bloom-defendant-in-st-pauls-rape-trial-must-try-to-be-liked-on-the-today-show/>)

What the St. Paul's rape case teaches us

by admin in The Bloom Firm Media Appearances

(<http://www.thebloomfirm.com/what-the-st-pauls-rape-case-teaches-us/>)

Lisa Bloom: Prep school suspect's friends may have damaged his case on The Today Show

by admin in The Bloom Firm Media Appearances

(<http://www.thebloomfirm.com/lisa->



(<http://www.thebloomfirm.com/lisa-bloom-with-client-janice-dickinson-on-et-discussing-lawsuit-against-bill-cosby/>)

The Bloom Firm Media Appearances (<http://www.thebloomfirm.com/category/the-bloom-firm-media-appearances/>)

May 20, 2015

[Lisa Bloom with Client Janice Dickinson on ET Discussing Lawsuit Against Bill Cosby](http://www.thebloomfirm.com/lisa-bloom-with-client-janice-dickinson-on-et-discussing-lawsuit-against-bill-cosby/)

(<http://www.thebloomfirm.com/lisa-bloom-with-client-janice-dickinson-on-et-discussing-lawsuit-against-bill-cosby/>)



(<http://www.thebloomfirm.com/lisa-bloom-with-client-janice-dickinson-on-cnn-discussing-lawsuit-against-bill-cosby/>)

The Bloom Firm Media Appearances (<http://www.thebloomfirm.com/category/the-bloom-firm-media-appearances/>)

May 20, 2015

[Lisa Bloom with Client Janice Dickinson on CNN Discussing Lawsuit Against Bill Cosby](http://www.thebloomfirm.com/lisa-bloom-with-client-janice-dickinson-on-cnn-discussing-lawsuit-against-bill-cosby/)

(<http://www.thebloomfirm.com/lisa-bloom-with-client-janice-dickinson-on-cnn-discussing-lawsuit-against-bill-cosby/>)



(<http://www.thebloomfirm.com/lisa-bloom-talks-suspicion-nation-on-charlie-rose/>)

The Bloom Firm Media Appearances (<http://www.thebloomfirm.com/category/the-bloom-firm-media-appearances/>)

April 30, 2014

[Lisa Bloom Talks Suspicion Nation on Charlie Rose](http://www.thebloomfirm.com/lisa-bloom-talks-suspicion-nation-on-charlie-rose/)

(<http://www.thebloomfirm.com/lisa-bloom-talks-suspicion-nation-on-charlie-rose/>)

(<http://www.thebloomfirm.com/lisa-bloom-talks-suspicion-nation-on-charlie-rose/>)

bloom-prep-school-suspects-friends-may-have-damaged-his-case-on-the-today-show/)

Your legal rights to protest, explained

by admin in The Bloom Firm

Media Appearances

(<http://www.thebloomfirm.com/your-legal-rights-to-protest-explained/>)

Lisa discusses about how even though Sam Dubose's bottle did not contain alcohol, it was irrelevant to his shooting on Dr. Drew by admin in The Bloom Firm Media Appearances (<http://www.thebloomfirm.com/lisa-discusses-about-how-even-though-sam-duboses-bottle-did-not-contain-alcohol-it-was-irrelevant-to-his-shooting-on-dr-drew/>)

Lisa Bloom discusses that Walter Palmer could claim he's subject of 'witch hunt' on the Today Show

by admin in The Bloom Firm

Media Appearances

(<http://www.thebloomfirm.com/lisa-bloom-discusses-that-walter-palmer-could-claim-hes-subject-of-witch-hunt-on-the-today-show/>)

Lisa discusses if dentist Walter Palmer face charges in US or Zimbabwe on the today Show

by admin in The Bloom Firm

Media Appearances

(<http://www.thebloomfirm.com/lisa-appears-on-the-today-show-to-discuss-if-dentist-walter-palmer-face-charges-in-us-or-zimbabwe/>)



(<http://www.thebloomfirm.com/piers-morgan-live-rewindlisa-bloom-on-george-zimmerman/>)

The Bloom Firm Media Appearances (<http://www.thebloomfirm.com/category/the-bloom-firm-media-appearances/>)

December 9, 2013

[Lisa Discusses George Zimmerman Charges on Piers Morgan Live](http://www.thebloomfirm.com/piers-morgan-live-rewindlisa-bloom-on-george-zimmerman/)

[\(http://www.thebloomfirm.com/piers-morgan-live-rewindlisa-bloom-on-george-zimmerman/\)](http://www.thebloomfirm.com/piers-morgan-live-rewindlisa-bloom-on-george-zimmerman/)

(<http://www.thebloomfirm.com/piers-morgan-live-rewindlisa-bloom-on-george-zimmerman/>)



(<http://www.thebloomfirm.com/the-today-show-legal-analyst-lisa-bloom-discusses-the-san-diego-mayor-scandal/>)

The Bloom Firm Media Appearances (<http://www.thebloomfirm.com/category/the-bloom-firm-media-appearances/>)

October 4, 2013

[Legal Analyst Lisa Bloom Discusses the San Diego Mayor Scandal on The Today Show](http://www.thebloomfirm.com/the-today-show-legal-analyst-lisa-bloom-discusses-the-san-diego-mayor-scandal/)

[\(http://www.thebloomfirm.com/the-today-show-legal-analyst-lisa-bloom-discusses-the-san-diego-mayor-scandal/\)](http://www.thebloomfirm.com/the-today-show-legal-analyst-lisa-bloom-discusses-the-san-diego-mayor-scandal/)

(<http://www.thebloomfirm.com/the-today-show-legal-analyst-lisa-bloom-discusses-the-san-diego-mayor-scandal/>)

(</media-appearances/page/2/?paged=1>) 1 (</media-appearances/page/2/?paged=1>) 2

3 (</media-appearances/page/2/?paged=3>) 4 (</media-appearances/page/2/?paged=4>)

(</media-appearances/page/2/?paged=3>)

(<https://plus.google.com/110946821476232>
(<https://twitter.com/LisaBloom>)
(<https://www.facebook.com/LisaBloomAuth>
(<http://www.linkedin.com/pub/lisa->



bloom/57/882/6a5)
(<https://instagram.com/lisabloomesq/>)

© 2015 All Rights Reserved. The Bloom Firm

LAVELY & SINGER

PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

SUITE 2400

2049 CENTURY PARK EAST

LOS ANGELES, CALIFORNIA 90067-2906

TELEPHONE (310) 556-3501

FACSIMILE (310) 556-3615

WWW.LAVELYSINGER.COM

JOHN H. LAVELY, JR.
MARTIN D. SINGER
BRIAN G. WOLF
LYNDA B. GOLDMAN
MICHAEL D. HOLTZ
PAUL N. SORRELL
MICHAEL E. WEINSTEIN
EVAN N. SPIEGEL

TODD S. EAGAN,
ANDREW B. BRETTLER,
DAVID B. JONELIS
LINDSAY D. MOLNAR,
ZEV F. RABEN,
JONATHAN M. KLEIN

ALLISON S. HART
HENRY L. SELF, III
OF COUNSEL

² ALSO ADMITTED IN NY
³ ALSO ADMITTED IN NY AND NJ

September 17, 2015

VIA EMAIL: Jivaka@TheBloomFirm.com

Jivaka Candappa, Esq.
THE BLOOM LAW FIRM
20700 Ventura Blvd., Suite 301
Woodland Hills, CA 91364

**Re: William H. Cosby, Jr. adv. Janice Dickinson
Our File No.: 980-53**

Dear Mr. Candappa:

We write in response to your letter of September 16, 2015 stating your intention to proceed with an *ex parte* application seeking (1) shortened time to hear Plaintiff's motion to lift the stay of discovery in order to depose Messrs. Cosby and Singer, and (2) to continue the hearing dates on Defendant's Anti-SLAPP Motion and Demurrer and the related opposition deadlines.

We will not agree to shorten the briefing time to hear Plaintiff's motion to lift the mandatory discovery stay on an expedited basis, nor will we agree to continue the hearings on the Anti-SLAPP Motion and Demurrer. There is no good cause for your planned *ex parte* application, and we intend to oppose it. Any motion seeking to lift the discovery stay would likewise lack merit and it will be opposed if filed.

It would be highly prejudicial to force Defendant to oppose a motion seeking to lift the mandatory discovery stay of Code of Civil Procedure § 425.16(g) on a shortened and expedited briefing schedule. Especially since such a motion could have been filed by your office literally months ago as a regular noticed motion, there is no good cause for your request. The utter lack of merit to any motion seeking leave to depose Mr. Cosby and Mr. Singer prior to the anti-SLAPP Motion being decided is further reason that your *ex parte* application should be denied.

Please provide a copy of your *ex parte* papers for our review as soon as they are available.

Very truly yours,


LYNDA B. GOLDMAN

Of
LAVELY & SINGER
PROFESSIONAL CORPORATION

LBG:lg

cc: Robert P. LoBue, Esq. (via email)
Andrew B. Brettler, Esq.