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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE COUNTY OF  
11 LOS ANGELES, CENTRAL DISTRICT-STANLEY MOSK COURTHOUSE

13 JANICE DICKINSON, an individual,

14 Plaintiff,

15 v.

16 WILLIAM H. COSBY, JR., an individual;  
17 and DOES 1 through 100, inclusive,

18 Defendants.  
19  
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22

CASE NO.: BC 580909  
[Case assigned to The Honorable  
Debre Weintraub – Department 47]

**DECLARATION OF PLAINTIFF  
JANICE DICKINSON IN SUPPORT OF  
PLAINTIFF’S REPLY TO  
DEFENDANT’S OPPOSITION TO  
MOTION TO LIFT STAY OF  
DISCOVERY PURSUANT TO CODE  
OF CIVIL PROCEDURE § 425.16(g)**

Complaint filed: May 20, 2015



1           10.     In or about 2001, I disclosed the same to Judith Regan, the president and publisher of  
2 Regan Books, an imprint of HarperCollins and the publisher of *No Lifeguard*.

3                           **I WAS NOT ALLOWED TO INCLUDE THE RAPE IN MY BOOK**

4           11.     Ms. Regan and Mr. Fenjves would not allow me to mention the rape in *No Lifeguard*,  
5 telling me that they feared that Mr. Cosby would sue or otherwise retaliate against HarperCollins. I  
6 begged them to include it, but instead they would only allow me to tell the milder version of his  
7 arrogant, disgusting sexually inappropriate conduct in the book.

8           12.     Nowhere in the book do I say that Mr. Cosby did *not* rape me. Nowhere do I state that  
9 the book is a complete and accurate recitation of everything that ever happened between Mr. Cosby  
10 and me. As in any memoir, an entire life cannot be told in just a few hundred pages. A memoirist  
11 must pick and choose which events to relay. And some poetic license is always used when recounting  
12 certain events, especially those involving disturbing events and living people.

13                           **I CONTINUED TO TALK ABOUT THE RAPE**

14           13.     In 2006, I appeared on The Howard Stern Show. He asked me a question about Bill  
15 Cosby. I was still afraid of Ms. Cosby's tremendous power but I also still wanted to tell the world  
16 what he had done to me. I said then on the show:

17                    "Bill Cosby was the only guy I couldn't write about in the book because  
18 [HarperCollins was] afraid of lawsuits... wouldn't touch that one. And I don't  
19 want to get near that because I don't have the shekels that you do or that Cosby  
20 does ... **The guy's a bad guy. Let me just say that. He's not a nice guy. He**  
21 **preys on women** that just come out of rehab. I'll just say that."

22           14.     In 2010, I told Dr. Drew Pinsky that I had been raped by a big celebrity. I was talking  
23 about Bill Cosby but I was still too afraid to say his name at that time because I was afraid he'd  
24 retaliate against me.

25           15.     In 2014 I declared personal bankruptcy.

26                           **NOVEMBER 2014: I PUBLICLY DISCLOSED THAT BILL COSBY RAPED ME**

27           16.     On or about November 18, 2014, in an interview on the television program  
28 Entertainment Tonight I finally told my story publicly and named Bill Cosby as the man who had

1 drugged and raped me in or about 1982.

2 17. Although Mr. Cosby’s team repeatedly says, without any factual support, that I  
3 “cashed in” on the story, I have not received any compensation for telling my story. It was a difficult  
4 decision to tell my story but I did it to stand in solidarity with the dozens of other women who had the  
5 same experience I did, being sexually assaulted by Bill Cosby. I could no longer remain silent. I am  
6 also older now, sober, and in a better position to stand up to this wealthy and powerful man.

7 18. Immediately, the same day I spoke to Entertainment Tonight, Mr. Cosby, through his  
8 representatives, publicly said I had fabricated my story. This was shocking and upsetting, and  
9 remains so to this day. I have been called a liar now by countless people and media commentators  
10 based on what Mr. Cosby put out about me. People openly mock and laugh at me. My peace of mind  
11 has been shattered.

12 19. Since Mr. Cosby said I was lying about his rape of me, I have suffered deep emotional  
13 pain. I have good days and bad days. On the good days I can work and hold my head high. On the  
14 bad days I have trouble working, interacting with my family and friends, and sleeping. Many people  
15 seem to have believed the public statements made by Mr. Cosby’s representatives that I am a liar.

16 20. I am not a liar. I am speaking the truth. Bill Cosby drugged and raped me. It was one  
17 of the worst experiences in my life.

18 **I HAVE A REPUTATION FOR HONESTY IN MY INDUSTRY**

19 21. I have worked hard for decades to earn a professional reputation as a woman who  
20 speaks my mind, boldly and directly and honestly. I am not perfect. No one is. And I don’t pretend to  
21 be. I have admitted to many mistakes I’ve made in my life, especially to some of the wild times I had  
22 before I became sober. I did this to help other people who have gone through similar struggles and to  
23 show them that it is possible to rise above addiction, heal, get sober, and lead a healthy life.

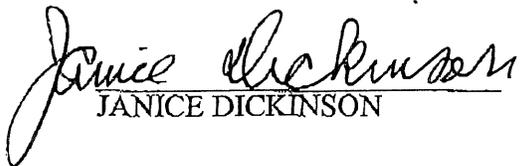
24 22. My “brand,” which has enabled me to work on more reality shows that anyone I know,  
25 is that I speak the truth – about myself and others. I call it like I see it. Profiles of me often lead with  
26 my reputation for honesty. For example, a CBS News profile about me was entitled “Janice  
27 Dickinson, Brutally Honest,” <http://www.cbsnews.com/news/janice-dickinson-brutally-honest/>, a true  
28 and correct copy of which is attached hereto as **Exhibit A**. Another profile of me by NBC News

1 correctly stated that "Janice Dickinson's honesty extends to her entire life and the entire world, and  
2 everyone she interacts with." ([http://www.today.com/id/13739864/ns/today-  
4 today\\_entertainment/t/janice-dickinson-redefines-model-behavior/#.VfdJNRHBzRY](http://www.today.com/id/13739864/ns/today-<br/>3 today_entertainment/t/janice-dickinson-redefines-model-behavior/#.VfdJNRHBzRY), a true and  
5 correct copy of which is attached hereto as **Exhibit B.**) These statements reflect my real reputation in  
6 the community as a no-nonsense truth teller, even sometimes when people don't want to hear the  
7 truth.

8 23. Mr. Singer claims to have "personal experience" with me in connection with a  
9 paternity action from years ago. He claims I was dishonest in that matter. This is completely false,  
10 and he offers no evidence to support it.

11 I declare under penalty for perjury under the laws of the State of California that the foregoing  
12 is true and correct.

13 Executed this 26<sup>th</sup> day of October, 2015, at Los Angeles, California.

14   
15 JANICE DICKINSON  
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# **EXHIBIT A**

By **JUDY FABER** / CBS / January 9, 2007, 8:04 PM

# Janice Dickinson, Brutally Honest



Model Janice Dickinson poses backstage at the Alan Del Rosario Spring 2007 fashion show during Mercedes Benz Fashion Week at Smashbox Studios in Stage One October 17, 2006 in Culver City, California. Marsaili McGrath/Getty Images for Alan Del Rosario / **MARSAILI MCGRATH/GETTY/DEL ROSARIO**

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Janice Dickinson doesn't mind a little hard work.

The self-described "world's first supermodel," reality TV star, photographer and author, is enjoying the challenge of running her own agency in front of the cameras.

"This job is twofold: I'm doing the start-up business along with my partner Peter Hamm, and making a television show out of it at the same time," she told **The ShowBuzz's Judy Faber**. "I'm tired obviously. (But), I'm having the best time of my entire life. I love my work."

When Oxygen's "The Janice Dickinson Modeling Agency" premiered last year, Dickinson had to start completely from scratch with her new venture.

"The premise of the show was I had to have a license, it had to be an actual operating business, which it is," she said. "It was a hoot and a holler to watch me go through the motions of finding the space, getting it decorated, getting accountants, finding a computer, learning how to use a computer."

Dickinson was a successful model in the 1970s and early '80s, working with the hottest designers, posing for the best photographers, and demanding top dollar for her services.

But, like many actors who claim that all they want to do is direct, Dickinson says she always wanted to own her own agency.

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"It started when I was 9 years old and I wanted to be Wilhemina Cooper, who was a very successful model in her day and afterward she founded the Wilhemina Agency in New York City," she said. "I always admired and looked up to her. I knew at the end of my modeling career — which for a model has a very short shelf-life — I knew I had to have something to fall back on."

 [Video: Janice Dickinson On Her Reality Show](#)

 [Video: Janice's Five Rules For Young Models](#)

Now that her dream has come true, Dickinson is charged with the task of finding talent for her agency. She had some successful bookings last season, but she lost Frederick's of Hollywood as a client when she didn't have models the lingerie company deemed sexy enough for their catalog.

By the end of the season, she had whittled down her talent roster to the models she and her partner felt were ready to work right away, with a few on deck who would need only a little more training to start getting jobs.

This season, she'll hold an open casting call and look for more talent, much to the chagrin of the "kids," as she calls them, on her current roster.

"You're going to see this season on my show some of the freshest faces in the industry, I'm not kidding you," she said. "The guys are already booking Vogue, huge campaigns, well you'll just have to tune in and see."

A single mom, Dickinson has a daughter, Savannah, 12, and a son, Nathan, 19. Both were seen on the show last season and this time around Nathan will take on the role of running part of the agency.

In her autobiography, "No Lifeguard On Duty: The Accidental Life Of The World's First Supermodel," Dickinson writes candidly about her many lovers, the wild parties, and her battles with substance abuse in a world where champagne flowed and cocaine was always available.

Because she's seen her share of the darker side of modeling, Dickinson has very strict advice for her "kids."

"I have rules," she said, emphatically. "No. 1, say no to drugs and alcohol; No. 2, get a high school education; No. 3 if you're under 18, make sure a parent accompanies you to a photo shoot or places unknown or other countries; No. 4, always bring a friend along with you and tell your agent, your booker, or your family members where you're going at all times," she said. "Because in my experience girls have disappeared, they've been kidnapped, there are many models that have had drug problems, along with myself."

As a judge on the CW's "America's Next Top Model" and on her own show, Dickinson has developed a reputation as a highly-critical taskmaster, sort of a Simon Cowell of the fashion world.

The way she sees it, she's just being realistic.

"People call me brutally honest. I am," she said. "It's a brutal, highly critical industry, the fashion industry. If they're not going to get it from me, they'll hear it from magazine editors, other photographers, fellow models, it just goes right down the line."

But, she adds that she's fiercely protective of her models, and always has their best interests at heart.

"The Janice Dickinson Modeling Agency" has been expanded to a one-hour

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**Maureen O'Hara 1920-2015**

format, and airs every Wednesday on Oxygen at 10 p.m. ET.

By Judy Faber

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# **EXHIBIT B**

# Janice Dickinson redefines model behavior

Janice Dickinson  
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Below 'Top Model' judge is still dishing out the cutting critiques

By  
**Andy Dehnart**

msnbc.com contributor  
updated 7/7/2006 1:27:05 PM ET  
**EXCLUSIVE INTERVIEW**

Janice Dickinson is not an enigma.

As the self-proclaimed “world’s first supermodel,” she gained fame on the covers of magazines and the runways of the world. Now, however, she’s earned a much wider audience because of her appearances on three reality TV shows.

That audience is not entirely in love with Janice, who, like many reality stars, is best-known by her first name only. As with **other reality show contestants**, she’s loved by some viewers, while others love to hate her. She is arrogant and emotional, over-the-top and harsh. She is loathed for her abrasive personality and cutting remarks, and she also loved for the exact same reasons. What Simon Cowell is to music, Janice Dickinson is to modeling.

Her sometimes caustic, always blunt personality is not unlike Cowell’s, nor was her model-judging performance as a former judge on UPN’s “America’s Next Top Model” all that different from his singer-judging act on “American Idol.” But while Simon restricts his brutal honesty for when he’s judging performers in a competition, Janice Dickinson’s honesty extends to her entire life and the entire world, and everyone who she interacts with.

One of her books is titled “Everything About Me Is Fake . . . And I’m Perfect,” and that describes her life—and her appeal—well. From her plastic surgery to her sex life, she presents her life for public consumption, and dissects others with the same ruthless efficiency that she uses on herself.

That is on display as part of Janice’s latest venture. “The Janice Dickinson Modeling Agency.” That is both the name of her new modeling agency and the title of the Oxygen reality series that follows her life as she starts the company and looks to acquire a stable of models.

## New show is different from ‘Top Model’

Her approach to judging on “Top Model,” which generally involved semi-shouting compact, shocking criticism without exchanging pleasantries, extends to her new agency. Janice said in an interview with MSNBC.com that “there’s no sugarcoating in this agency. If the kids don’t get the honest-to god truth from me ... they’re going to get it from [others].”

The truth is often delivered in a way that tends to shock both those on the receiving end and viewers. After one potential “Janice Dickinson Modeling Agency” model gave her size, Janice responded, “You’re a thirty-seven ass? You gotta lose some poundage, missy!” In another episode, she told a different model that what she really needed was “a big nose job.”

Models, she said, “don’t fall off a truck. ... It’s a learned technique.” Janice Dickinson clearly values perseverance as much as personality, which are, unsurprisingly, those attributes that helped her career develop since she started modeling at age 14.

There is nothing she’s looking for specifically. “I have no idea until I see the person,” she said, admitting that “sometimes I don’t even see it.”

Although she critiques models who want to join her agency, the approach her new series takes is the opposite of “Top Model,” however. It is not a talent search show that will crown a winner, as the Tyra Banks-hosted UPN show does, but instead it will award “not just contracts but careers,” she said. And the series, which was filmed over four months, is “a real documentary of my life,” Janice says.

As a result, “now the public has an idea” of her real self and her real life, she says. That real life includes her two children, to whom she’s intensely committed, admitting unapologetically that her stay in VH1’s “Surreal Life” house was for the money. Her new show, too, is ultimately for financial benefit. Dickinson’s daughter, she said, “hates being in front of the camera. ... But I have to have her on because it’s part of my show. If she wants to go to college,” Janice said, her daughter will appear on-screen. Janice says viewers will eventually “see her warming up to it.”

Her son, Nathan, on the other hand, is clearly more comfortable in front of the camera, and as a recent episode showed, chose the real-world education of working with his mother in the agency and on the show over going to film school.



There's no question who's in charge on Oxygen's 'The Janice Dickinson Mc

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With this new Oxygen series, Janice Dickinson is, for the first time, in control of how the show is produced—and, it follows, how other people perceive her. Filming for this series “wasn’t intrusive,” Janice said in an interview, “because I’m an executive producer. I’m able to turn the camera on and off at whim. ... or I edit out what I think is too personal.”

That was important for her, perhaps because the public’s current perception of her has been formed by her two previous reality shows, “Top Model” and “The Surreal Life.” It’s “very important for people to have control over their lives,” Janice said.

Perhaps contradictorily, she insists that “there’s no editing and no bulls---“ and that the new series remains one “of rigorous honesty.”

On VH1’s “The Surreal Life,” a number of episodes focused on Janice’s near-constant combat with “Apprentice” star Omarosa Manigault-Stallworth. The two reality TV stars shrieked things such as, “I’ll yank your weave off, honey,” and Janice appeared to delight in torturing Omarosa, who relentlessly called Janice a “crackhead.” Fellow cast member Jose Canseco summed up the conflict by saying that Janice and Omarosa’s confrontation was “more scary than jail.”

It was riveting television that did more for VH1’s ratings than it did for Janice’s reputation, which was developed over four seasons on “America’s Next Top Model.” There, she sat in judgment of the models, hurling honesty-fueled verbal fireballs at them.

Surprisingly, two seasons ago Janice was essentially fired and replaced on the panel by the far more demure Twiggy. Janice said at the time that producers no longer wanted her brand of extreme truth-telling on the show, and in an interview, she said that producers ultimately “edited out all the stuff that I was saying that meant something.”

Still, she has appeared four times in the fifth and sixth season of the show, as a photographer and guest judge. Even after firing her, “Top Model” couldn’t divorce itself from Janice Dickinson, just as viewers are both repulsed and drawn in at the same time.

*Andy Dehnart is a writer and teacher who publishes [reality blurred](#), a daily summary of reality TV news.*

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