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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 COUNTY OF LOS ANGELES, CENTRAL DISTRICT

13 JANICE DICKINSON, an individual,  
14 Plaintiff,

15 v.

16 WILLIAM H. COSBY, JR., an individual  
17 Defendant.

Case Number: BC 580909  
[Case assigned to The Honorable  
Debre Weintraub – Department 47]

**DECLARATION OF DREW PINSKY IN  
SUPPORT OF OPPOSITION TO  
DEFENDANT’S SPECIAL MOTION TO  
STRIKE PLAINTIFF’S COMPLAINT**

Date: February 29, 2016

TIME: 8:30 A.M.

DECLARATION

*Janice Dickinson v. William H. Cosby, Jr.*  
Case No. BC 580909

1                                   **DECLARATION OF DREW PINSKY, M.D.**

2           1.       I am a practicing physician, Board Certified in Internal Medicine and Board  
3 Certified in Addiction Medicine. I am also Assistant Clinical Professor of Psychiatry at the  
4 Keck USC School of Medicine. I had been for many years an Assistant Clinical Professor. Since  
5 2010 I have also been the host of a nightly show on the HLN television network, Dr. Drew On  
6 Call ("Dr. Drew"). For over 25 years I have also been the host of the nationally syndicated radio  
7 show Loveline. I also hosted six seasons of the television show Celebrity Rehab with Dr. Drew  
8 ("Celebrity Rehab") from 2008-2012.

9           2.       I submit this declaration (i) to apprise the court about Janice Dickinson's  
10 reputation for truthfulness; (ii) to correct the record about false inferences drawn by Defendant  
11 Bill Cosby's legal team regarding Ms. Dickinson's appearance on my show Dr. Drew several  
12 years ago; and (iii) to disclose that Ms. Dickinson revealed to me years ago that she had been  
13 raped by a prominent celebrity. If called as a witness, I could and would competently testify  
14 regarding the matters set forth herein.

15           3.       I have known Ms. Dickinson for at least five years, as she appeared on Celebrity  
16 Rehab, Season 4, in 2010. During that time I worked closely with Ms. Dickinson on her  
17 substance abuse issues. Since that time I have remained in contact with Ms. Dickinson and she  
18 has appeared on my HLN show, Dr. Drew.

19                                   **Ms. Dickinson Has a Reputation for Truthfulness**

20           4.       In my experience working with Ms. Dickinson on an individual level, and as a  
21 television and radio host knowledgeable about the professional reputations of entertainers who I  
22 cover on a regular basis, I believe that Ms. Dickinson is an honest person. In fact, in the  
23 entertainment industry Ms. Dickinson has a reputation for being plain spoken and sometimes  
24 *overly honest*. She can be blunt and unvarnished in her statements and this puts some people off,  
25 but overall, Ms. Dickinson is known in our industry as a person who speaks the truth.  
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DECLARATION OF DREW PINSKY, M.D.

*Janice Dickinson v. William H. Cosby, Jr*  
Case No. BC 580909

1        **Ms. Dickinson's Revelations About Her Addiction Should Not Brand Her As a Liar**

2            5.        I understand that in support of his Special Motion to Strike Ms. Dickinson's  
3 Complaint against him (the "Motion"), Defendant William Cosby has submitted to this court a  
4 DVD of my HLN show, Dr. Drew (Singer Declaration, Exh. K).

5            6.        In the Motion, Mr. Cosby calls my show on which Ms. Dickinson appeared  
6 "Recovering Celeb Addicts, Reformed Liars." This was not, in fact, the correct title for my  
7 show. The correct title is "Dr. Drew On Call." Those words appeared on the screen during the  
8 broadcast, but were put there by a producer without my authorization. Had I known, I would not  
9 have allowed it. We were not intending to brand anyone a liar on the show.

10           7.        Mr. Cosby attempts to use my show to claim that Ms. Dickinson has been  
11 "persistently characterized as a liar who even cultivated that reputation herself." (Motion at p.  
12 11.)

13           8.        This is an incorrect interpretation of the video clip, and I would like to correct  
14 the record.

15           9.        The show was not intended to brand Janice Dickinson as a liar, nor would that be  
16 a fair interpretation. Instead, it was intended to shed light on the phenomenon of addiction. On  
17 the show Ms. Dickinson, like other guests, admitted to lying *in her past* while she was using  
18 substances as part of her addiction. Ms. Dickinson also conceded that growing up with a  
19 pedophile father, she had lied to protect him as a child. She says on the video: "If I spoke, he  
20 would have beaten up my family. He physically abused me on a daily basis."

21           10.       None of this should have any bearing on whether Ms. Dickinson, now sixty years  
22 old, is truthful in her statement that Mr. Cosby drugged and raped her. Ms. Dickinson, as a  
23 woman now clean and sober for several years, did not claim that she lies about anything  
24 currently.

25           11.        In my professional opinion, an addict may get clean and sober and become an  
26 honest and truthful person. I believe that has been the case for Ms. Dickinson.  
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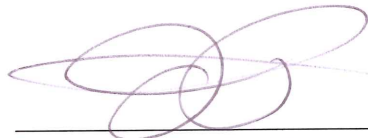
1           12. In fact, toward the end of the video clip (Motion, Singer Declaration, Exhibit K  
2 at 4:27), Ms. Dickinson reveals that as part of her twelve step addiction recovery program she  
3 had to reveal embarrassing information to an ex. This was in accordance with the ninth step,  
4 making amends to people one has wronged. To do this, she has had to be painfully honest about  
5 mistakes she has made. She should be applauded for that.

6           13. Ms. Dickenson has maintained her sobriety and one of the axioms of addiction  
7 treatment and recovery is rigorous honesty. In fact, it has been my experience that a recovering  
8 addict who does not maintain rigorous honesty will not maintain sobriety.

9           **Years Ago, Ms. Dickinson Revealed to Me that She Was Raped By a Celebrity**

10           14. During the shooting for *Celebrity Rehab* in 2010, Ms. Dickinson told me that  
11 she had been raped by a prominent celebrity. She said she feared to say the name because it  
12 would have legal consequences.

13           I declare under penalty of perjury under the laws of the State of California that the  
14 foregoing is true and correct. Executed this 14<sup>th</sup> day of September, 2015, at Pasadena,  
15 California.

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18           DREW PINSKY, M.D.  
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