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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 LISA BLOOM 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

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No Admissible Evidence Exists that Ms. Dickinson Claimed Mr. Cosby’s Lawyers Pressured Her to Leave Him Out of Her Book, Nor Did I “Retract” Such a Claim

3. Defendant Cosby submits video recordings of Ms. Dickinson's few television interviews on the subject of Defendant Cosby drugging and raping her. Nowhere in any of these videos does Ms. Dickinson claim that Defendant Cosby or his lawyers pressured her not to include the information in her book. Defendant Cosby's attorneys do not point to any video recording of Ms. Dickinson so claiming, nor could they.

5. Defendant Cosby's attorney John Schmitt submits a declaration in which he claims that I told him on a February 9, 2015 phone call that I "was retracting Ms. Dickinson's allegation that Mr. Cosby's lawyers had pressured HarperCollins to remove the rape story from the Book." This is categorically false. I never made that statement. What I said was that Ms. Dickinson was not making that claim, nor did she.

1 6. Only one line in one exhibit supports Defendant Cosby’s position that Ms. Dickinson
2 so claimed. Exhibit A to Mr. Singer’s Declaration is a printout from a web article purported to
3 be from “ET Online.” At the seventh paragraph, the print reporter states:

4 “Dickinson . . . claims that when she submitted a draft with her full story to
5 HarperCollins, Cosby and his lawyers pressured her and the publisher to remove
6 the details.”

7 7. This one sentence appears to form the only basis for the claim, repeated frequently in
8 Defendant Cosby’s moving papers, that Ms. Dickinson so stated. Yet it is one online reporter’s
9 recollection of statements purportedly made by Ms. Dickinson that is curiously not reflected in
10 the videotaped interview with ET (Entertainment Tonight) that ran the same day and otherwise
11 forms the basis for the article. This print reporter does not even quote Ms. Dickinson, as she
12 does many times elsewhere in the article.

13 8. The news article containing the reporter’s recounting of what she claims Ms.
14 Dickinson said is double hearsay and inadmissible on this motion. It is also highly unreliable
15 because in the midst of comments attributed to Ms. Dickinson with quotation marks around
16 them – which comments are on the video recording – it is a rare comment the reporter attributes
17 to Ms. Dickinson without quotation marks around it, and which is nowhere on the video.

18 9. As is sadly common, other media outlets copied this false assertion and repeated it,
19 without any basis for the statement or independently fact checking it.

20 **HarperCollins’ Publication of Two Cosby Books Just After *No Lifeguard***

21 10. HarperCollins had two Cosby-authored books that were published shortly after *No*
22 *Lifeguard*. Attached hereto as **Exhibit 1** is a true and correct copy of the HarperCollins.com
23 webpages indicating the scheduled opening sale dates of those books.

24 **Cosby, Through His Attorney, Brands Ms. Dickinson a Liar**

25 11. Attached hereto as **Exhibit 2** is a true and correct copy of the November 18, 2014
26 letter sent by Mr. Cosby’s attorney, Martin Singer, to the press (the “November 18 Press
27 Statement”). Mr. Cosby was cc’d on this letter. This letter was sent to BuzzFeed.com and other
28 media outlets and then picked up and run by thousands of media outlets worldwide. While Mr.

1 Cosby argues that this was a confidential demand letter, the recipients of the November 18 Press
2 Statement clearly disagreed. BuzzFeed.com, for example, immediately posted the entire letter on
3 its website, where it remains to date. Attached hereto as **Exhibit 3** is a true and correct copy of
4 the BuzzFeed article entitled, “Here is How Bill Cosby’s Lawyer is Trying to Discredit Janice
5 Dickinson, [http://www.buzzfeed.com/katearthur/bill-cosbys-lawyer-is-trying-to-discredit-](http://www.buzzfeed.com/katearthur/bill-cosbys-lawyer-is-trying-to-discredit-janice-dickinson#.nhMN05WeBK)
6 [janice-dickinson#.nhMN05WeBK](http://www.buzzfeed.com/katearthur/bill-cosbys-lawyer-is-trying-to-discredit-janice-dickinson#.nhMN05WeBK).

7 12. Attached hereto as **Exhibit 4** is a true and correct copy of the *Variety Today* article
8 detailing the November 19, 2014 press statement issued by Mr. Cosby’s attorney, Martin Singer
9 (the November 19 Press Statement). This press release was picked up and run by thousands of
10 media outlets worldwide.

11 13. Mr. Cosby has not sued any of these media outlets. Nor has he ever sued any of the
12 thousands of media outlets who have published stories about the over fifty women who have
13 now accused him of attempted or actual sexual assault over the last decade.

14 14. Attached as **Exhibit 5** is a true and correct copy of the demand for retraction issued
15 by me on behalf of Ms. Dickinson to three separate attorneys for Mr. Cosby on February 2,
16 2015, prior to the commencement of this action. No retraction occurred.

17 **Publicly Available Evidence That Was Known (or Should Have Been**
18 **Known) to Mr. Singer Prior to Branding Ms. Dickinson a Liar**

19 15. For nearly fifty years, Mr. Cosby has openly expressed a lurid and obsessive
20 fascination with drugging women in order to have sex with them. In his 1969 comedy album,
21 “It’s True! It’s True!” Defendant Cosby talked about the mythical properties of the drug
22 “Spanish Fly” which would make women feel amorous and sexually submissive. Defendant
23 Cosby said “go to a party, see five girls standing alone, Boy, if I had a whole jug of Spanish
24 Fly, I’d light that whole corner up over there.” Attached as **Exhibit 6** hereto is an audio clip
25 downloaded from YouTube.com containing these comments
26 (<https://www.youtube.com/watch?v=LAorIG6MZnc>).
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1 16. Defendant Cosby again extolled the wonders of Spanish Fly in his 1991 book,
2 *Childhood*. In his book, Defendant Cosby wrote a lengthy description of his search for Spanish
3 Fly so that he could secretly drug women and then have sex with them. “Girls are “never in the
4 mood for us,” he wrote, “They need chemicals.” Attached as **Exhibit 7** hereto is a true and
5 correct copy of pp. 169–185 in *Childhood*.

6 17. Defendant Cosby again brought up Spanish Fly in his 1991 interview with Larry
7 King on CNN to promote his book. In this interview Defendant Cosby asked Larry King if he
8 knew about Spanish Fly. Defendant Cosby said, “Spanish Fly was the thing that all boys from
9 age 11 on up to death – we will still be searching for Spanish Fly.” Defendant Cosby said that
10 he could put a pinhead sized drop of Spanish Fly in a woman’s drink and she would become
11 sexually submissive. Attached as **Exhibit 8** hereto is the video clip downloaded from
12 YouTube.com (<https://www.youtube.com/watch?v=JtZwL4c2JYA>).

13 18. These stories are not fiction or mere entertainment. In his 2011 book *I Didn’t Ask to*
14 *Be Born: (But I’m Glad I Was)*, Defendant Cosby states, “All of my performances and writings
15 have been inspired by my experiences, which, I believe, give an honest and truthful picture of
16 my life.” Attached as **Exhibit 9** hereto is a true and correct copy of the book cover, copyright
17 page and author’s note in *I Didn’t Ask to Be Born: (But I’m Glad I Was)*. Notably, Ms.
18 Dickinson makes no such claim in her memoir, *No Lifeguard*.

19 19. Before Ms. Dickinson came forward, many other women had come forward to
20 disclose that they had been drugged and raped by Defendant Cosby. Attached as **Exhibit 10**
21 hereto is a true and correct copy of a December 16, 2014 article from *The Guardian*
22 ([http://www.theguardian.com/world/2014/nov/24/the-bill-cosby-sexual-abuse-claims-](http://www.theguardian.com/world/2014/nov/24/the-bill-cosby-sexual-abuse-claims-accusation-by-accusation)
23 [accusation-by-accusation](http://www.theguardian.com/world/2014/nov/24/the-bill-cosby-sexual-abuse-claims-accusation-by-accusation)).

24 20. Before Mr. Singer’s Press Statements, Mr. Cosby already admitted to giving illegal
25 narcotics to women (**Plaintiff’s Request for Judicial Notice, Exhibit A**) for the purpose of
26 having sex with them (**Plaintiff’s Request for Judicial Notice, Exhibit B**). Attached as
27
28

1 **Exhibit 11** hereto is a true and correct copy of an article published on CNN.com containing
2 transcript excerpts (<http://www.cnn.com/2015/07/20/us/bill-cosby-deposition/>).

3 21. In 2015, a U.S. District Court judge found that Mr. Cosby's representatives'
4 accusations of lying against other alleged rape victims were "provable as true or false." *See*
5 **Plaintiff's Request for Judicial Notice, Exhibit D.**

6 22. Mr. Cosby's attorneys have publicly conceded that "when his attorneys speak,
7 we're speaking for him." Attached as **Exhibit 12** hereto is a true and correct copy of the
8 transcript of the CNN interview of Monique Pressley, current counsel for Mr. Cosby.

9 23. For many years Defendant Cosby authorized Mr. Singer to attack women. Attached
10 as **Exhibit 13** hereto is a true and correct copy of the *New York Times* article indicating that "at
11 several critical moments over the past few decades, Mr. Cosby has called on Martin D. Singer,
12 an \$850-an-hour lawyer with a reputation for playing rough" to publicly demean women
13 accusing Mr. Cosby of rape ([http://www.nytimes.com/2014/12/29/arts/cosby-teams-strategy-](http://www.nytimes.com/2014/12/29/arts/cosby-teams-strategy-hush-accusers-insult-them-blame-the-media.html?_r=0)
14 [hush-accusers-insult-them-blame-the-media.html?_r=0](http://www.nytimes.com/2014/12/29/arts/cosby-teams-strategy-hush-accusers-insult-them-blame-the-media.html?_r=0)).

15 **More Women Come Forward; Mr. Cosby Publicly Jokes About Drugging his Victims**

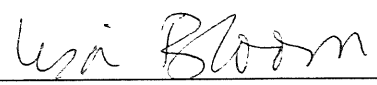
16 24. More than fifty women have now come forward to publicly accuse Bill Cosby of
17 sexual assault. Most tell strikingly similar stories that he drugged them without their knowledge,
18 or by tricking them. The first of these was Andrea Constand, in 2005. Attached as **Exhibit 14**
19 hereto is a true and correct copy of the August 20, 2015 Vanity Fair article introducing the latest
20 women to come forward against Mr. Cosby
21 (<http://www.vanityfair.com/hollywood/2015/08/bill-cosby-rape-sexual-assault-50-accusers>)

22 25. Even after dozens of women had publicly accused him of rape, Mr. Cosby continued
23 to brazenly joke about his criminal activity in at least one public forum. On January 8, 2015, in
24 a stand-up performance in Ontario, Canada, Defendant Cosby asked a woman from the audience
25 who had gotten up where she was going. She told him that she was going to get a drink. He
26 replied: "You have to be careful about drinking around me." Attached as **Exhibit 15** hereto is a
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true and correct copy of the Associated Press article (republished on FoxNews.com), dated
January 9, 2015.

I declare under penalty of perjury under the laws of the State of California that the
foregoing is true and correct and that this Declaration was executed this 16th day of February,
2016, in Woodland Hills, California.



Lisa Bloom

EXHIBIT 1



HarperCollins Publishers

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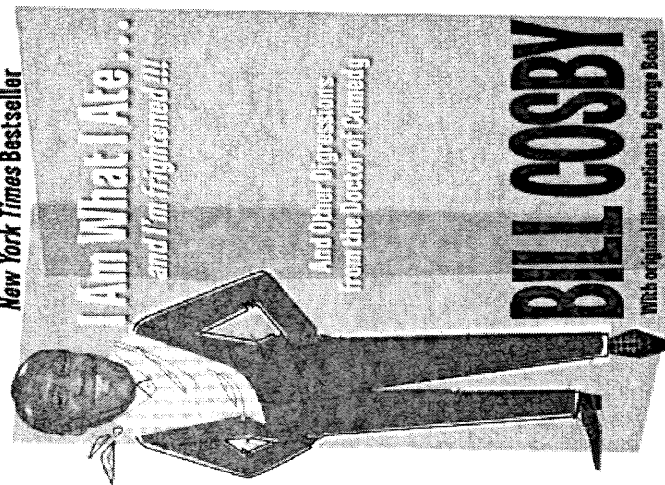
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And Other Digressions from the Doctor of Comedy
by Bill Cosby

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About the Book

From the #1 US bestselling author, the hilarious US bestselling book of original essays for the adult market focusing on themes of health and food, which explores why Americans are hooked on such bad eating, drinking and other self-indulgent and self-destructive behaviours throughout their lives.

The legendary Bill Cosby, America's most well-known comic, wants food lovers and over indulgers everywhere to know that they are not alone. This is an original collection of hilarious musings and digressions about our obsessions and addictions, from hoagies to stogies, from one of the funniest bestselling authors in the world.

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About the Book

Meet Slipper, Feathers, and Hog. Three of the rarest birds ever known to humankind.

Now people say birds of a feather tend to flock together, but not on the Beach by the Rock. That's where these three unique friends meet for the first time, performing risky feats for one another and then later for the hundreds of folks who gather to watch.

But when the stunts of the most gifted and eager-to-please bird are overshadowed by the sheer beauty of his best friend, an attempt to borrow back the limelight nearly ends in disaster. Why do these birds stunt fly at all? What do they expect from the skies, one another, and the crowds below? And just what are the people on the beach looking for from them?

It takes a flight of imagination, the courage to be oneself, and the support of good friends to find out.

EXHIBIT 2

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DAVID B. JONELIS
ZEV F. RABEN
JONATHAN M. KLEIN

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

* ALSO ADMITTED IN IL
* ALSO ADMITTED IN NY AND NJ

November 18, 2014

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VIA EMAIL: kate.aurthur@buzzfeed.com

Ms. Kate Aurthur
Chief Los Angeles Correspondent
Buzzfeed

Re: Bill Cosby / Janice Dickinson, et al.

Dear Ms. Arthur:

We are litigation counsel to Bill Cosby. We are writing regarding your planned story regarding Janice Dickinson's new false and outlandish claims about Mr. Cosby in her recent *Entertainment Tonight* interview, asserting that he raped her in 1982 (the "Story"). That Story is fabricated and is an outrageous defamatory lie. In the past, Ms. Dickinson repeatedly confirmed, both in her own book and in an interview she gave to the *New York Observer* in 2002, that back in 1982 my client "blew her off" after dinner because she did not sleep with him. Her new Story claiming that she had been sexually assaulted is a defamatory fabrication, and she is attempting to justify this new false Story with yet another fabrication, claiming that Mr. Cosby and his lawyers had supposedly pressured her publisher to remove the sexual assault story from her 2002 book. That never happened, just like the alleged rape never happened. Prior to publishing this Story with Ms. Dickinson's new defamatory assertions, you should contact neutral third parties, such as her own publisher, to confirm that she is lying.

Neither Mr. Cosby nor any of his attorneys were ever told by Harper Collins that Ms. Dickinson had supposedly planned to write that he had sexually assaulted her, and neither Mr. Cosby nor any of his representatives ever communicated with the publisher about any alleged rape or sexual assault story planned for the book. Because you can confirm with independent sources the falsity of the claim that my client's lawyers allegedly pressured the publisher to kill the story, it would be extremely reckless to rely on anything Ms. Dickinson has to say about Mr. Cosby since the story about the publisher is patently false.

Ms. Dickinson completely fabricated the Story of alleged rape. In a transparent effort to justify the glaring contradiction between her new rape claim and what she wrote in her book and what she told to the *New York Observer* in her September 9, 2002 interview "*Interview*

Re: Bill Cosby / Janice Dickinson, et al.

November 18, 2014

Page 2

*With a Vamp.*¹ she also manufactured the story that my client and my client's lawyers pressured her publisher to take the purported rape story out of her 2002 book. If you contact Harper Collins, the publisher will undoubtedly confirm that Mr. Cosby and his lawyers were never told that Ms. Dickinson claimed she had been raped and intended to write about it in her book. The first Mr. Cosby and his lawyers ever heard of Ms. Dickinson's specious rape allegation was not back in 2002, it was now, in Ms. Dickinson's *Entertainment Tonight* interview, a dozen years after Ms. Dickinson's book was published, a dozen years after she confirmed to the *New York Observer* what she wrote in her book, and more than 30 years after their dinner in Lake Tahoe.

Prior to publication of Ms. Dickinson's book, her publisher sent the pages about Mr. Cosby to his publicist, who responded "good luck." There was no mention of rape or sexual assault whatsoever. Nobody tried to kill any sexual assault or rape story. These facts can be confirmed with the publisher. If you proceed with the false Story when you can check the facts with neutral independent sources who will provide you with facts demonstrating that the Story is false and fabricated, you will be acting recklessly and with Constitutional malice.

It would be extraordinarily reckless to disseminate this highly defamatory Story when Ms. Dickinson herself told an entirely different story in her book, when she confirmed that same entirely different story in an interview with the *New York Observer* a dozen years ago, when you may independently confirm with her publisher the falsity of her new assertion that my client's lawyers supposedly pressured her publisher to delete the alleged rape story from her book, and when her new allegation of rape was made for the first time only now, when it appears that she seeking publicity to bolster her fading career.

More than three decades have passed since the 1982 Lake Tahoe dinner described in Ms. Dickinson's book about how she was *not* intimate with my client, and a dozen years have passed since her book came out and she confirmed that same story to the media. You can easily confirm that the manufactured story that my client's lawyers pressured the publisher to take the rape story out of the book is utterly fabricated. Since at a minimum Ms. Dickinson fabricated the assertion my client's lawyers pressured the publisher more than a decade ago to take out the sexual assault story — a story we heard now for the first time — it would be reckless to rely on Ms. Dickinson in this matter.

Ms. Dickinson's new assertion that she was raped by my client back in 1982 is belied by her own words, which completely contradict her current fabrications. We caution you in the strongest possible terms to refrain from disseminating the outrageous false Story. If you recklessly publish the Story instead of checking readily available information demonstrating its falsity, all those involved will be exposed to very substantial liability.

¹ <<http://observer.com/2002/09/interview-with-the-vamp/>>

Re: Bill Cosby / Janice Dickinson, et al.

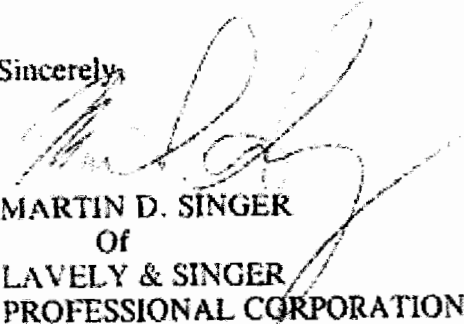
November 18, 2014

Page 3

You proceed at your peril.

This does not constitute a complete or exhaustive statement of all of my client's rights or claims. Nothing stated herein is intended as, nor should it be deemed to constitute a waiver or relinquishment, of any of my client's rights or remedies, whether legal or equitable, all of which are hereby expressly reserved. This letter is a confidential legal communication and is not for publication.

Sincerely,



MARTIN D. SINGER
Of
LAVELY & SINGER
PROFESSIONAL CORPORATION

MDS/lbg

cc: Mr. William H. Cosby
John Schmitt, Esq. (via email)
Mr. David Brokaw (via email)
Lynda B. Goldman, Esq.

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EXHIBIT 3



ENTERTAINMENT

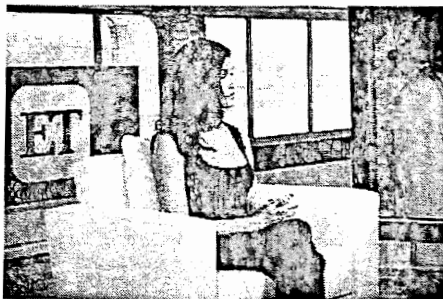
Here Is How Bill Cosby's Lawyer Is Trying To Discredit Janice Dickinson

After the former supermodel accused Cosby of raping her in 1982, his lawyer sent BuzzFeed News a letter calling the claims "false and outlandish."

posted on Nov. 19, 2014, at 11:43 a.m.



Kate Aurthur
BuzzFeed News Reporter



Entertainment Tonight



Olivier Douliery/Abaca Press / MCT


Bill Cosby has been experiencing a torrent of criminal accusations and an accompanying wave of bad press recently, and now he has fired back at his latest accuser, former supermodel Janice Dickinson. Dickinson went on *Entertainment Tonight* on Tuesday to say that Cosby had raped her in Lake Tahoe in 1982. What she described sounded similar to the other multiple allegations against Cosby. According to Dickinson, he told her he could help her career, and then after a dinner, he gave her a pill with some wine. She found herself, she said, being "sexually assaulted" in her hotel room.

Dickinson told *Entertainment Tonight*, "The next morning I remember waking up with my pajamas off and there was semen in between my legs." She said she came forward because "it's the right thing to do."

BuzzFeed News wrote about Dickinson's allegations on Tuesday, and reached out to Cosby's publicist for comment. Hours after the story had been published with no response from his representative, BuzzFeed News received a letter from Cosby's new attorney, Martin Singer, who, in the past, has represented celebrities such as Charlie Sheen and John Travolta.

BuzzFeedNEWS

In The News Today

- Former United Nations Secretary-General Boutros Boutros-Ghali has died. He was 93.
- Monday marked an "unprecedented" surge in attacks on health facilities in Syria, according to a report from aid groups.
- And American Airlines is a lot like you: It wants Gogo's terrible in-flight Wi-Fi to be better. So the airline is suing 

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by Chris Geidner

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As *The Hollywood Reporter* noted last year, Singer has “become famous for sending menacing legal threats.” In the letter to BuzzFeed News, Singer argued that Dickinson contradicted her own accusations against Cosby in the past. Dickinson’s representative did not immediately respond to BuzzFeed News asking for her response.

Cosby, 77, remains in a perilous place in terms of his career and his public persona. As of Wednesday, NBC pulled the plug on the pilot it was developing with Cosby, and Netflix announced Tuesday night that it was postponing the launch of his comedy special that was to start streaming on Nov. 28.

As this story has exploded, Singer hasn’t been answering for Cosby — but he has seemingly been brought in to try to manage this crisis. “You proceed at your peril,” he wrote to BuzzFeed News.

Here is the letter from Martin Singer to BuzzFeed News.

To print the document, click the "Original Document" link to open the original PDF. At this time it is not possible to print the document with annotations.

If you have information about Bill Cosby you would like to share with BuzzFeed News, please email kate.aurthur@buzzfeed.com.

Janice Dickinson Says Bill Cosby Raped Her, Netflix Puts Upcoming Cosby Special On Hold

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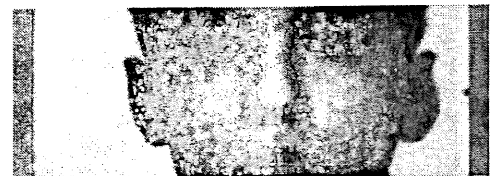
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OF COUNSEL
ALL NEW YORK AND NEW JERSEY

November 18, 2014

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VIA EMAIL: kate.arthur@buzzfeed.com

Ms. Kate Arthur
Chief Los Angeles Correspondent
Buzzfeed

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of 3



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and she is attempting to justify this new false Story with yet another fabrication, claiming that Mr. Cosby and his lawyers had supposedly pressured her publisher to remove the sexual assault story from her 2002 book. That never happened, just like the alleged rape never happened. Prior to publishing this Story with Ms. Dickinson's new defamatory assertions, you should contact neutral third parties, such as her own publisher, to confirm that she is lying.

Neither Mr. Cosby nor any of his attorneys were ever told by Harper Collins that Ms. Dickinson had supposedly planned to write that he had sexually assaulted her, and neither Mr. Cosby nor any of his representatives ever communication with the publisher about any alleged rape or sexual assault story planned for the book. Because you can confirm with independent sources the falsity of the claim that my client's lawyers allegedly pressured the publisher to kill the story, it would be extremely reckless to rely on anything Ms. Dickinson has to say about Mr. Cosby since the story about the publisher is patently false.

Ms. Dickinson completely fabricated the Story of alleged rape. In a transparent effort to justify the glaring contradiction between her new rape claim and what she wrote in her book and what she told to the *New York Observer* in her September 9, 2002 interview "Interview

Re: Bill Cosby / Janice Dickinson, et al.

November 18, 2014

Page 2

With a *Vamp*, " she also manufactured the story that my client and my client's lawyers pressured her publisher to take the purported rape story out of her 2002 book. If you contact Harper Collins, the publisher will undoubtedly confirm that Mr. Cosby and his lawyers were never told that Ms. Dickinson claimed she had been raped and intended to write about it in her book. The first Mr. Cosby and his lawyers ever heard of Ms. Dickinson's specious rape allegation was not back in 2002, it was now, in Ms. Dickinson's *Entertainment Tonight* interview, a dozen years after Ms. Dickinson's book was published, a dozen years after she





Page




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News.

DOCUMENT	PAGES	TEXT
<p>Zoom  Search </p> <p>Prior to publication of Ms. Dickinson's book, her publisher sent the pages about Mr. Cosby to his publicist, who responded "good luck." There was no mention of rape or sexual assault whatsoever. Nobody tried to kill any sexual assault or rape story. These facts can be confirmed with the publisher. If you proceed with the false Story when you can check the facts with neutral independent sources who will provide you with facts demonstrating that the Story is false and fabricated, you will be acting recklessly and with Constitutional malice.</p> <p>It would be extraordinarily reckless to disseminate this highly defamatory Story when Ms. Dickinson herself told an entirely different story in her book, when she confirmed that same entirely different story in an interview with the <i>New York Observer</i> a dozen years ago, when you may independently confirm with her publisher the falsity of her new assertion that my client's lawyers supposedly pressured her publisher to delete the alleged rape story from her book, and when her new allegation of rape was made for the first time only now, when it appears that she seeking publicity to bolster her fading career.</p> <p>More than three decades have passed since the 1982 Lake Tahoe dinner described in Ms. Dickinson's book about how she was <i>not</i> intimate with my client, and a dozen years have passed since her book came out and she confirmed that same story to the media. You can easily confirm that the manufactured story that my client's lawyers pressured the publisher to take the rape story out of the book is utterly fabricated. Since at a minimum Ms. Dickinson fabricated the assertion my client's lawyers pressured the publisher more than a decade ago to take out the sexual assault story — a story we heard now for the first time — it would be reckless to rely on Ms. Dickinson in this matter.</p> <p>Ms. Dickinson's new assertion that she was raped by my client back in 1982 is belied by her own words, which completely contradict her current fabrications. We caution you in the strongest possible terms to refrain from disseminating the outrageous false Story. If you recklessly publish the Story instead of checking readily available information demonstrating its falsity, all those involved will be exposed to very substantial liability.</p> <p>^ < http://observer.com/2002/09/interview-with-the-vamp/ ></p>		

 Page 2 of 3 

If you have information about Bill Cosby you would like to share with Buzz! Please email kate.arthur@buzzfeed.com

News.

DOCUMENT

PAGES

TEXT

Zoom

Search

Re: Bill Cosby / Janice Dickinson, et al.

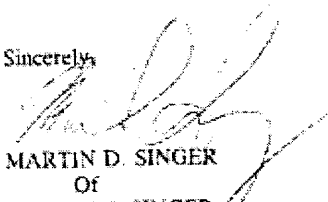
November 18, 2014

Page 3

You proceed at your peril.

This does not constitute a complete or exhaustive statement of all of my client's rights or claims. Nothing stated herein is intended as, nor should it be deemed to constitute a waiver or relinquishment, of any of my client's rights or remedies, whether legal or equitable, all of which are hereby expressly reserved. This letter is a confidential legal communication and is not for publication.

Sincerely,


MARTIN D. SINGER
Of
LAVELY & SINGER
PROFESSIONAL CORPORATION

MDS/lbg

cc: Mr. William H. Cosby
John Schmitt, Esq. (via email)
Mr. David Brokaw (via email)
Lynda B. Goldman, Esq.

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EXHIBIT 4

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Bill Cosby Lawyer Disputes Janice Dickinson's Rape Claim

- [EmailPrint](#)
- [15Talk](#)
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-
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Getty Images
November 19, 2014 | 07:58AM PT

Cynthia Littleton

Managing Editor: [Television@Variety_Cynthia](#)

UPDATE: NBC has dropped its **Bill Cosby** comedy project from development. Here is the full statement by attorney Martin Singer:

Janice Dickinson's story accusing Bill Cosby of rape is a lie. There is a glaring contradiction between what she is claiming now for the first time and what she wrote in her own book and what she told the media back in 2002. Ms. Dickinson did an interview with the New York Observer in September 2002 entitled "Interview With a Vamp" completely contradicting her new story about Mr. Cosby. That interview a dozen years ago said "she didn't want to go to bed with him and he blew her off." Her publisher Harper Collins can confirm that no attorney representing Mr. Cosby tried to kill the alleged rape story (since there was no such story) or tried to prevent her from saying whatever she wanted about Bill Cosby in her book. The only story she gave 12 years ago to the media and in her autobiography was that she refused to sleep with Mr. Cosby and he blew her off. Documentary proof and Ms. Dickinson's own words show that her new story about something she now claims happened back in 1982 is a fabricated lie.

Attorney Martin Singer is disputing the claim made by former model Janice Dickinson that she was raped by Bill Cosby in 1982.

Singer, a top showbiz litigator who is frequently hired by celebs facing PR and legal crises, has blasted the accusations Dickinson leveled against Cosby on Tuesday's edition of "Entertainment Tonight."

"Janice (Dickinson's) story accusing Bill Cosby of rape is a complete lie," Marty Singer, Cosby's attorney, said in a statement. "There is documentary proof that Janice Dickinson is fabricating and lying about Bill Cosby."

Dickinson told "ET" in a lengthy interview that Cosby drugged and assaulted her after inviting her into his hotel room in Lake Tahoe, where he was performing. She claimed that she tried to tell the story in her 2002 autobiography but was blocked by Cosby's legal team. Singer asserted this claim was also untrue.

See More: Janice Dickinson Says Bill Cosby Sexually Assaulted Her in 1982

"The only story she gave 12 years ago in her autobiography as well as her interview with the media was that she refused to sleep with Mr. Cosby and he blew her off," Singer said. "You can confirm with (publisher) Harper Collins that she never claimed Mr. Cosby raped her, that no attorney representing Bill Cosby tried to kill the story (since there was no such story) and no one tried to prevent anything she wanted to say about Bill Cosby in her book."

Singer's statement marks a change in how Cosby's camp is handling of the growing allegations against the comedian from multiple women. The comedian himself has refused

to comment, and another Cosby attorney on Sunday issued a short statement denying what he called “discredited” claims from other women but refused to elaborate.

The mushrooming scandal has already had major fallout for the comedian, who has for decades been one of America’s most beloved entertainers. Cosby has canceled media appearances, and on Tuesday night Netflix confirmed it would delay the planned release of an hourlong comedy special “Bill Cosby 77,” which had been set to bow on Nov. 28.

There is strong speculation in the biz that NBC will be forced to put on hold its development of a new domestic comedy that was to star Cosby as the patriarch of an eclectic family.

Singer has experience dealing with clients who are facing salacious sexual allegations. Earlier this year, he guided director Bryan Singer through a lawsuit brought by Michael Egan, who made splashy claims in April that he was raped by Singer and others years before when he was underage. The case was dropped by Egan in August.

Filed Under:

- Bill Cosby

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EXHIBIT 5

^{T H E}
BLOOMFIRM
Attorneys at Law

February 2, 2015

VIA CERTIFIED MAIL AND READ RECEIPT E-MAIL:

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jpschmitt@pbwt.com
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PO Box 15507
Springfield, MA 01115-5507

Re: Janice Dickinson v. William H. Cosby, Jr.

Dear Counsel:

This firm is litigation counsel for Janice Dickinson. We are writing regarding Martin Singer's multiple false and defamatory press statements on behalf of Dr. William H. Cosby, Jr. about Ms. Dickinson, which have caused significant harm to Ms. Dickinson's name and reputation.

Demand is hereby made that Dr. Cosby immediately take corrective action, by fully and publicly retracting those statements and apologizing to Ms. Dickinson within ten days of this letter.

20700 Ventura Blvd., Suite 301 | Woodland Hills, CA 91364 | P (888) 96- BLOOM | F (866) 85-BLOOM
www.TheBloomFirm.com | Lisa@TheBloomFirm.com

A. Accusing Ms. Dickinson of Lying in Her Disclosure That Dr. Cosby Raped Her Is False, Defamatory, Malicious and Reckless

On November 19, 2014, Mr. Singer, on behalf of Dr. Cosby, issued the following statement to the press (the "Nov. 19 Defamatory Statement") which was republished by thousands of media entities worldwide. We have inserted numbers to enumerate the separate counts of defamation.

(1) Janice Dickinson's story accusing Bill Cosby of rape is a lie. (2) There is a glaring contradiction between what she is claiming now for the first time and what she wrote in her own book and what she told the media back in 2002. Ms. Dickinson did an interview with the New York Observer in September 2002 entitled "Interview With a Vamp" (3) completely contradicting her (4) new story about Mr. Cosby. That interview a dozen years ago said "she didn't want to go to bed with him and he blew her off." Her publisher Harper Collins can confirm that no attorney representing Mr. Cosby tried to kill the alleged rape story (since there was no such story) or tried to prevent her from saying whatever she wanted about Bill Cosby in her book. (5) The only story she gave 12 years ago to the media and in her autobiography was that she refused to sleep with Mr. Cosby and he blew her off. (6) Documentary proof and Ms. Dickinson's own words show that her new story about something she now claims happened back in 1982 is a fabricated lie.

First, the statement that "Ms. Dickinson's story accusing Dr. Cosby of rape is a lie" is false. Ms. Dickinson recalls that Dr. Cosby drugged and raped her while she visited him in Lake Tahoe, California in the early 1980's, after Dr. Cosby lured her there with false promises. Dr. Cosby is surely aware of what occurred between him and Ms. Dickinson in Lake Tahoe. By denying the truth and publicly labeling Ms. Dickinson as a liar, via his attorney, he has defamed Ms. Dickinson personally and professionally.

Second, Ms. Dickinson has never lied about what happened between her and Dr. Cosby. She did not disclose the complete story in her autobiography or her interview with *New York Observer* per her ghostwriter's and publisher's insistence. Each of these individuals – the two individuals from her publishing house who are most knowledgeable about the book and the suppression of Ms. Dickinson's rape disclosure -- confirms that Ms. Dickinson fought to have the entire story, including the rape disclosure, in the book, but they could not allow it for fear that Dr. Cosby would sue or otherwise retaliate against the publisher. See Declarations of Judith Regan, then President and Publisher of ReganBooks, and Pablo Fenjves, attached.

Third, these stories do not "completely contradict" Ms. Dickinson's disclosure that she was raped by Dr. Cosby. In fact, in the *Observer* interview the writer simply quotes the book, then quotes Ms. Dickinson stating how disgusted she was with Dr. Cosby. In fact she has told a number of people in the years since this horrific incident that Dr. Cosby drugged and raped her.

Fourth, her rape disclosure is not “new.” Witnesses will attest to the fact that Ms. Dickinson told them about the incident years ago, including before any other women publicly claimed that Dr. Cosby raped them. Since the beginning, Ms. Dickinson has told the same story that Dr. Cosby drugged and raped her more than 30 years ago.

Fifth, your statement that “The only story she gave 12 years ago to the media and in her autobiography was that she refused to sleep with Dr. Cosby and he blew her off” is false. As the attached declarations from two individuals Dr. Cosby’s team did not contact before defaming Ms. Dickinson conclusively establish, Ms. Dickinson “very much wanted to include her rape by Mr. Cosby” in the book.

Sixth, there is no “documentary proof” that Ms. Dickinson’s story in her book claimed to be exhaustive of all the facts regarding encounters between Ms. Dickinson and Dr. Cosby. Ms. Dickinson’s claims are not “new” and calling her story a “fabricated lie” is patently defamatory.

Separate Defamatory Correspondence to the News Media

On November 18, 2014, Mr. Singer, on behalf of Dr. Cosby, had issued a similarly defamatory press statement to the news media, including Entertainment Tonight (CBS) and BuzzFeed.com (the “Nov. 18 Defamatory Statement”), which was then picked up and republished by thousands of media entities worldwide. We have inserted numbers to enumerate the separate counts of defamation.

- (1) We are writing regarding your planned story regarding Janice Dickinson’s new false and outlandish claims about Mr. Cosby in her recent Entertainment Tonight interview, asserting that he raped her in 1982 (the “Story”).*
- (2) That Story is fabricated and is an outrageous defamatory lie. ...*
- (3) Her new Story claiming that she had been sexually assaulted is a defamatory fabrication, and she is attempting to justify this new false Story with yet another fabrication, claiming that Mr. Cosby and his lawyers had supposedly pressured her publisher to remove the sexual assault story from her 2002 book.*
- (4) That never happened, just like the alleged rape never happened.*

First, Ms. Dickinson’s “Story” about Dr. Cosby, declaring that he raped her, is not “new” and her claims are not “false and outlandish.” Mr. Singer is making false and defamatory statements about Ms. Dickinson, who, like so many other women, contends that she was drugged and raped by Dr. Cosby. As explained above, Dr. Cosby did drug and rape Ms. Dickinson in Lake Tahoe.

Second, Mr. Singer calls the “Story” “fabricated and an outrageous defamatory lie” to publicly humiliate Ms. Dickinson for her truthful rape disclosure. In fact, by making this offensive statement, Mr. Singer is making an outrageous defamatory statement insulting Ms. Dickinson by calling her a liar.

Third, Ms. Dickinson has told this “Story” to many individuals throughout the years and the “Story” is not “new”. Witnesses are willing to testify that they knew about her claims against Dr. Cosby years ago.

Fourth, by stating that “the alleged rape never happened”, Mr. Singer is clearly calling Ms. Dickinson a liar, which is false and defamatory.

B. By Accusing Ms. Dickinson of Lying Without Checking the Facts With Independent Sources, Mr. Singer, on Behalf of Dr. Cosby, Acted Recklessly and With Malice

Mr. Singer was well aware of his legal obligations before speaking to the press, as outlined in his own Nov. 18 Defamatory Statement, and acted with reckless disregard to the falsity of his statements nonetheless:

Prior to publishing this Story with Ms. Dickinson's new defamatory assertions, you should contact neutral third parties, such as her own publisher, to confirm that she is lying.

If you proceed with the false Story when you can check the facts with neutral independent sources who will provide you with facts demonstrating that the Story is false and fabricated, you will be acting recklessly and with Constitutional malice.

Mr. Singer should have taken his own advice and checked the facts with neutral third parties including Ms. Regan and Mr. Fenjves. He did not. These individuals confirm Ms. Dickinson's story and that she disclosed the drugging and rape by Dr. Cosby prior to the publication of her book in 2002.

Furthermore, our sources at Harper Collins inform us that neither Mr. Singer nor anyone from his office has ever contacted Harper Collins to “confirm that she is lying”. Mr. Singer clearly is demanding that one should contact neutral third parties, such as Ms. Dickinson's own publisher, Harper Collins before making any false Story. By making these false and defamatory statements about Ms. Dickinson, Mr. Singer according to his own understanding of the law has acted recklessly and with malice.

C. The Numerous Other Accusers Will Be Permitted to Corroborate the Truth of Ms. Dickinson's Rape Disclosure

Over two dozen women have now publicly disclosed strikingly similar claims of being drugged and sexually assaulted by Dr. Cosby from 1967 through 2008, across the United States, allegations which add credibility to Ms. Dickinson's rape disclosure under California law. These criminal acts show a pattern and practice regarding Dr. Cosby's behavior. Instead of acknowledging his alleged wrongdoings, via his attorneys, he has blamed the victims and accused them of lying.

Unfortunately for Dr. Cosby, California Evidence Code Sec. 1101(b) permits the introduction of uncharged prior sexual offenses like the more than two dozen currently alleged

against Dr. Cosby. This provision has been broadly interpreted by California courts. Evidence of uncharged sexual offenses is so uniquely probative in sex crimes actions that it is presumed admissible without regard to the limitations of the Evidence Code's general prohibition on character evidence.

As stated by the California Supreme Court, quoting the author of the legislation, Evidence Code Sec. 1108 “permits courts to admit such evidence on a common sense basis—*without a precondition of finding a ‘non-character’ purpose* for which it is relevant—and permits rational assessment by juries of evidence so admitted. This includes consideration of the other sexual offenses as evidence of the defendant’s disposition to commit such crimes, *and for its bearing on the probability or improbability that the defendant has been falsely or mistakenly accused of such an offense.*” (Emphasis added)

An astonishing number of women have now publicly claimed that Dr. Cosby drugged and/or raped them in strikingly similar allegations. The failure of Mr. Singer to take those similar accusers into account when he knew or should have known that these other accusers’ disclosures would be admissible in court constitutes further malice and recklessness on his part and on behalf of Dr. Cosby.

D. The Defamatory Press Statements Have Damaged Ms. Dickinson’s Reputation and Revictimized Her

There is no question as to the defamatory nature of Mr. Singer’s press statements on behalf of Dr. Cosby. Each such statement ascribed dishonesty to Ms. Dickinson, an allegation that is libelous per se. The intent and effect of these statements is to ruin Ms. Dickinson’s reputation in the community and to deter others from associating or dealing with her. This has affected Ms. Dickinson and her family. Indeed, the many online articles reporting Mr. Singer’s defamatory statements on behalf of Dr. Cosby are replete with public comments repeating the claim that Ms. Dickinson is a liar, which many have simply accepted as true. Ms. Dickinson has worked hard throughout her life as a supermodel, television personality and single mother of two and demands that Dr. Cosby immediately publicly correct the record to restore her reputation.

This letter is not intended as a full recitation of each and every incident of defamation of Ms. Dickinson by Mr. Singer and Dr. Cosby, nor does it constitute a complete or exhaustive statement of all of Ms. Dickinson’s rights or claims. Nothing stated herein is intended as, nor should it be deemed to constitute a waiver or relinquishment, of any of our client’s rights or remedies, whether legal or equitable, all of which are hereby expressly reserved.

Very truly yours,

Lisa Bloom

LISA BLOOM

For The Bloom Firm

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DECLARATION OF JUDITH REGAN

I, JUDITH REGAN, declare as follows;

1. I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would competently testify thereto.

2. In 2002, I was the President and Publisher of ReganBooks, an imprint of HarperCollins.

3. ReganBooks was the publisher of Janice Dickinson's autobiography, *No Lifeguard on Duty*.

4. In 2002, I had many conversations with Janice Dickinson regarding her autobiography and her life story.

5. While working on the book, Ms. Dickinson told me, as did the ghostwriter, Pablo Fenjves, that she had been raped by Bill Cosby. Ms. Dickinson stated this with certainty and pleaded with me to include this in her book.

6. I was very disturbed by this conversation. I discussed it with the legal department at Harper Collins and the legal department told me that we could not include it without corroboration. I made an argument to the legal department that it would be very difficult to corroborate instances such as rape and I believed Janice to be credible.

7. As a publisher, I felt like I had a duty to publish the true story, so I argued with the legal department but ultimately the decision by the legal department was not to include it.

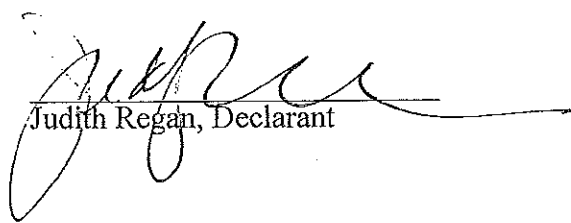
8. Ms. Dickinson fought with me about this decision. She was very passionate about it and very much wanted to include her rape by Mr. Cosby in the book.

9. Mr. Cosby was mentioned in the book to satisfy Ms. Dickinson in some way; however, the story was modified to deal with this issue without any legal problems.

10. I found Ms. Dickinson credible when I worked with her. I found her stories to be credible. Nonetheless, because of the legal position of Harper Collins the story she told of the Cosby rape was not included in the book.

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

3 Executed on January 12, 2015, in California.

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7 Judith Regan, Declarant
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DECLARATION OF PABLO FENJVES

I, PABLO FENJVES, declare as follows;

1. I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would competently testify thereto.
2. I am a screenwriter and ghostwriter. I helped Janice Dickinson with her 2002 memoir, *No Lifeguard on Duty*.
3. To help her with the memoir, Janice and I had many in depth conversations in 2001 and 2002.
4. In the course of our conversations, Janice mentioned a horrific experience with Bill Cosby ("Cosby"), the entertainer.
5. Janice told me Cosby had invited her to visit him in Lake Tahoe to talk about her interest in television.
6. However, when Janice got to Lake Tahoe, Cosby showed no real interest in helping her with her career.
7. Janice told me that instead, Cosby drugged her and raped her.
8. As Janice recounted the details, she was visibly distraught.
9. Unfortunately, I had to tell her that we would not be able to include much of the story in her book, if any, because Cosby was a powerful man and he would undoubtedly sue to protect his reputation.
10. I subsequently had a brief conversation about the matter with Judith Regan, then head of Regan Books, at Harper Collins.
11. At the end of the day, we decided not to include the story to avoid a lawsuit, and instead went with a sanitized version of the encounter.
12. Janice was upset with this decision because she had hoped to include the entire story.
13. Instead, I wrote that Janice rebuffed Cosby's sexual advances and retreated to her room.

14. This is what we talk about when we talk about "dramatic liberties".

15. The story Janice shared with her readers was true, but she left out the damaging details, at our insistence, to avoid a lawsuit.

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

Executed on January 5, 2015, in Los Angeles, California.

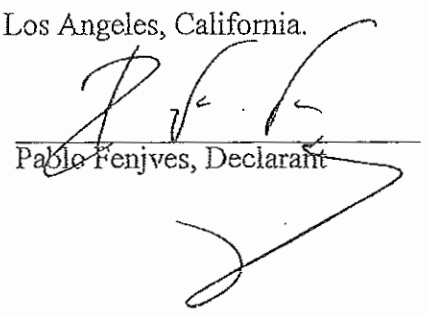

Pablo Fenjves, Declarant

EXHIBIT 6

[DVD ATTACHED]

EXHIBIT 6

EXHIBIT 7

10

Or Maybe It's a Spanish Flea

That party at Eddie's now seems to have been my last moment of innocence, a quality that children used to have, before they began going directly from Pabulum to the Pill. By the following year, I not only knew how to dance and talk all at once, but my friends and I were in hot pursuit of Spanish Fly, which wasn't something that buzzed in Barcelona.

By the time that I was thirteen, I understood sex, but I was still too short and thin to expect that any girl, no matter how much she liked my smile, would ever surrender to me anything more than her rotating shoulder blades. And then one morning, Junior Barnes told us about Spanish Fly, an aphrodisiac so potent that it could have made Lena Horne surrender to Fat Albert.

"You feed this stuff to a girl and she just goes crazy for you," he said.

"Does she gotta be Spanish?" said Eddie.

"I don't think so," said Junior. "She just gotta be a girl."

"How do you feed it to her?" I asked him. "In a sandwich or somethin'?"

"You gotta slip it to her when she thinks she's drinkin' somethin' else. A coupla drops in her Dr Pepper."

"But you gotta be careful not to give her too much," said Junior, "or she'll go for a flagpole instead o' you."

"Well, how d'ya know how much?" I said. "Does it say on the bottle?"

"Soon as her clothes come off, that's enough."

"I heard that even better is ground rhinoceros horn," said Weird Harold.

"Maybe," said Junior, "but it's probably easier to get rhino horn in Africa than Philadelphia. Spanish Fly is the thing, I tell ya."

"So where do we get some?" said Harold.

"Well, my brother knows this guy on Bainbridge who has a deal with the Spanish Navy."

"What's it look like?" I said.

"You can get it any way: a powder, a cookie, juice. But it don't matter: either one an' the girl comes flyin' at ya legs first."

"Wow," said Harold in raunchy reverence. "I'd give her a whole glass."

"I told ya: too much an' she forgets about you an'

takes on the Navy yard."

While they talked about love, I pictured Dorothy Dandridge sitting on my bed, having beaten Lena Horne there.

Some Spanish Fly, Dorothy? I would graciously say.

Love some, she'd reply.

With or without ice?

Do you happen to have the drops?

Of course. Eye or nose?

"What does it cost?" said Eddie, snapping me back to reality.

"A lot," said Junior. "This stuff ain't Juicy Fruit."

"You think they trade for baseball cards?" said Harold.

"No, I think those Spanish sailors want money. But if we pool all we got . . ."

Early that evening, Junior reconvened the family-life class at the sewer, collected nine dollars and sixty cents from Eddie, Harold, Fat Albert, and me, and then led us off in search of Spanish Fly. We were feeling the way that the soldiers of Ponce de León must have felt when they began to search for the Fountain of Youth. Of course, they probably already had plenty of Spanish Fly, in case they ran into any sleeping señoritas on the way.

"I got a new plan," said Junior as we walked to the trolley to take us downtown. "My brother hasn't seen the guy on Bainbridge lately, so he says we should go right to the Navy yard an' look for Spanish sailors."

A challenge indeed now lay ahead, for most of the Spanish sailors in America were hanging around in 1610, but we had the resourcefulness of city kids of the forties.

When we reached the big Navy yard, we found a sentry booth with a sailor who was probably guarding a secret supply of Spanish Fly. Nervously, we planned our attack.

"Junior, you talk to him," said Harold. "You're good at askin' for Spanish Fly."

"But he's an *American* sailor," said Eddie. "He wouldn't know."

"Maybe we better go back," said Fat Albert, "an' just wait till the girls're in the mood."

"They're never in the mood for us," I said. "They need chemicals."

"Okay," said Junior, "I'll make the deal. You guys cover me."

"If my father ever catches me here . . ." said Harold.

"Don't worry, man," I told him. "It's your *mother* who looks for sailors," an observation I would not have made when I was twelve and knew nothing about women.

Bravely approaching the sailor, Junior now said,

"Don't shoot, I'm American!"

"Hey, so am I," the sailor replied. "What's your business, American?"

"My friends an' I . . . well, see, we got a school science project and . . . well, to get really good marks, we could use some . . ." He smiled knowingly at the sailor,

who smiled in bewilderment at him. "Some . . ." And he dropped his voice to a whisper so that no spies would overhear. "Spanish Fly."

"Danish rye?"

"No, Spanish Fly."

The sailor laughed. "How much do you need?"

"Enough for our grade—for the project, that is. We can pay for it."

"Yeah? How much?"

"Nine dollars and sixty cents."

"Well, I just happen to have nine dollars and sixty cents' worth right here. I been holdin' it for the admiral, but since you boys have this school project . . ."

"Hey, what luck!" cried Fat Albert to the sailor, who already must have been thinking of selling him the Liberty Bell.

While fantasies danced in our heads, the sailor reached into the booth and brought out a khaki packet about twice the size of a baseball card.

"That's it?" said Junior.

"Don't tell me you never seen none before," said the sailor.

"Oh, I seen tons, but mostly in cans."

"Man, Spanish Fly's a powder."

"Of course it is. I musta been thinkin' about Spanish tuna."

"You boys know how to use this stuff? For your science project, I mean. You got some scientific girls that's gonna help you? 'Cause you don't do this project just with guys."

"Oh, we're definitely gonna use girls," said Harold.

"Okay, look, seein' that it's a school project, I'm not gonna charge ya for the stuff."

"Hey, thanks!" said Junior, and the rest of us echoed his gratitude. "Anytime we can do anything for you..."

The best thing we could have done for this sailor would have been to help him forget that we were some of the people he was protecting.

"Say, you boys wanna know what happens to the girls in this science project?" he said with a devilish smile. "I got a picture of a coupla students that tried it in the Philippines."

"That a Philadelphia school?" said Fat Albert.

The sailor laughed, again reached into the booth, and this time brought forth a photograph more remarkable than a shot of downtown Mars: a naked woman kissing a naked man.

"Spanish Fly made her do that?" said Fat Albert.

"Absolutely," said the sailor. "With her clothes on, that woman's a librarian."

For a few days after our educational trip to the Navy yard, Junior hid the magical packet in his closet, while we tried to arrange a party that the girls would never forget. I would've had it at my house, but I didn't want Russell there telling the girls that I didn't like anyone touching me.

At last, we chose Fat Albert's apartment, for we had convinced his mother that a party would help his social

progress. Up till this point, his social progress had been that of a warthog and his mother was concerned.

"Yes, I'd like my Albert to meet some nice girls," she had said.

And he would, but not at this party, which had been planned to honor girls with a potential for depravity.

When Saturday came, I was as happy as if I'd just learned that Russell had been traded to another project. About an hour before the party was to begin, the four of us went to Fat Albert's apartment, not to help him fold napkins but to plan the best way to give the girls their little hormonal favors.

"How we gonna feed 'em powder?" said Harold, for that was what the sailor's packet contained.

"Easy, man," said Junior. "We just mix it in the punch."

"But punch is tough to do," said Eddie. "Easier just to sprinkle it on 'em. Pretend they got an itch or somethin'."

"No," said Junior, "it's gotta go inside 'em."

"An' when Fat Albert's mother drinks it," I said, "we better make sure his father's around."

"Hey, that was a good one, Cos," said Harold. "I think I get it."

"You sure it can go in the punch?" said Eddie to Junior.

"C'mon, I'll show ya."

And he led us to the bowl of punch, where he

poured some into a glass, dropped in a bit of the precious powder, and stirred it with two fingers, a sight to make any girl swear off liquids. But when his fingers came out, the Spanish Fly hadn't dissolved: it sat on the punch like newly fallen snow.

"A girl sees that," said Eddie, "she's gonna suspect somethin'."

"He's right," I said. "No girl's gonna drink powder unless she's really thirsty."

"Okay," said Junior, "then we sprinkle it on the cookies. It looks like sugar anyway."

"No it don't," said Fat Albert. "It looks like somethin' for fleas."

"So whadda we gonna do, Junior?" said Harold.

"Don't worry, I'll think of somethin'."

"You better," said Eddie, "'cause there's just no point in a party unless the girls're takin' off their pants."

"My mother's not gonna be too crazy about it if she sees a lotta pants comin' off," said Fat Albert. "I mean, ones that ain't mine. So how we gonna do this, Junior?"

"Don't worry, I'll think of somethin'."

In spite of the challenge now facing us, I still was optimistic about what could happen at this party, even though the happening depended on that shaky thing called Junior's ability to think.

The girls began arriving at eight o'clock; and, as each one walked in, I wondered if she might be the potentially depraved girl of my dreams. These were the

same old girls from all of our non-pharmaceutical parties, but now I saw them climbing the walls, and maybe even me. When the Ink Spots began to sing and the dancers began to square off in the center of the room, my mind was on a much less dreamy form of romance.

"So where's the stuff go, Junior?" said Eddie in a fierce whisper.

"It's gotta be the cookies," said our leader in lust.

"Where are they?"

"They're still in the kitchen," said Fat Albert.

"Great! Get your mother outa there an' I'll dump the stuff on."

"How do I get her out? She loves it in there."

"Dance with her."

"That'll kill 'em," said Eddie with a grin. "Two tons o' dancin'."

"You gotta do it," Junior told Fat Albert. "I gotta be alone with the cookies."

And so, while the Ink Spots sang "Amor," Fat Albert danced with his mother and kept all eyes away from the kitchen, where Junior was turning the cookies into trips to the moon.

A few minutes later, we began offering them to the girls with casual desperation.

"Man, are these cookies *delicious*," I said to Elaine.

"Have a few."

"No, thank you," she replied.

"Why not?"

"I gotta give you a reason?"

"Yeah, I wouldn't mind one," said 1950's Cookie Monster.

"'Cause I'm not hungry, that's why."

"But dinner was two hours ago."

My style perhaps could have been smoother, but this, after all, was the first aphrodisiac I ever had pushed.

With a quizzical look, Elaine said, "Did you happen to *bake* these?"

"Well, I had a hand in 'em."

"Oh, that's sweet; I love it when boys bake things. Of course I'll try one."

Taking a cookie from my tray, she daintily bit off a piece—and then put down the rest.

"Gosh, William, I'm afraid I don't really like ginger. But it was lovely of you to bake them."

Damn Fat Albert's mother! Why did the stupid woman use *ginger*?

"Take one with a lotta sugar on it," I quickly said, "and you won't taste the ginger."

"Oh, I'm sure I still will."

"No you won't."

"William, what's wrong with you tonight?"

What was wrong with me? Just a sentimental desire to see Elaine chew her way out of her clothes.

In other parts of the room, my four restless co-conspirators also were having no luck with their sabotaged servings: the girls were eating the cookies, but they were remaining quietly dressed.

"It ain't *workin'*, Junior," said Harold as the five of us gathered in despair.

"It takes time."

"I'll happen when we ain't around."

"You think we can keep the party goin' another day?" I said.

But the party was short and depressingly sweet. Moreover, we never did learn what the aphrodisiac was, although Fat Albert's mother took a guess.

"I don't know," she said, "but these cookies kinda taste like cornstarch. I wonder if they'd be good for my feet."

Am I Insane?

In my first thirteen years as a man, I had kept finding memorable ways to fail at love: as a star-crossed crossing guard, as the refrigerated Romeo of the skating pond, and as the dreamy dispenser of Spanish Fly. All that, however, had been but rehearsal for real romance in the halls of Fitzsimons Junior High; for suddenly, the boyhood of buck-buck and the Bookster monster gave way to a world that contained only a vision named Lori Newman.

After a few days in Fitzsimons, I was aware that a lot of the boys were singing a new song, a jazzy lyric that began,

*There I go, there I go.
Pretty baby, you are the soul who snaps my control.*

*Such a funny thing,
But every time you're near me
I never can behave.
You give me a smile
And then I'm wrapped up in your magic...
Just let me get next to you.
Am I insane?*

"Hey, man, what's the name of that song all you guys keep singin'?" I said one day to James Murray, the coolest boy in the whole ninth grade.

"Moody's Mood for Love," he replied. "It's the best way to get women."

"Well, that's how I want 'em: the best way. You know Lori Newman?"

"Yeah, a gas. In fact, the gas works."

"You think the song would work on her?"

"Is she female? It only works on women that's female."

He began to laugh, but I couldn't laugh too because the thought of conquering Lori Newman was making me feel the way I was supposed to feel in church.

"No kiddin'," I softly said.

"Bill, you ever had a woman?"

"Oh, sure—lots of 'em."

"Then you don't need the song."

"Well, I like to be safe. Can you teach it to me?"

"Check, Daddy. I got the record home."

And so, that day after school, I went to James's house, where he began to play "Moody's Mood for Love." He played it four or five times, while I sat there

memorizing the words.

"Y' know, there's a party Saturday at Celia's," he finally said. "Everybody there'll know 'Moody's.'"

"Listen, James... here's the thing..."

"You ain't been invited."

"You could say that."

"I'll getcha in; Celia's got me playin' drums. And ol' Lori'll be there."

"Gee, James, that's great."

"No problem, Daddy. To glory with Lori, right?"

When I entered the party, Celia's phonograph already was playing The Song and I said to the first boy I saw, "Hey, my favorite song: 'A Moody Mood for Love.'"

"Moody's Mood for Love," he replied.

"Right; I musta been thinkin' of that *other* one."

And suddenly, I saw Her, lighting up the far side of the room and laughing at something clearly unfunny that a tall boy beside her had just said. The days of Spanish Fly sandwiches were behind me now. I would have to win this beauty not with chemicals but my memory for music.

As I courageously cut across the floor, James began to accompany the song on his drums and the rhythm so possessed me that I found myself hopping toward Lori while also singing along. If her taste in men was for one from Looney Tunes, she would be mine.

At last, I reached her and I stopped my bop and my song. It was time to be conventionally alluring:

"Hey, Lori," I said, once again letting my mouth lead my mind by a considerable distance, "wharcha doin'?"

"She's waitin' for a trolley," said the tall boy and Lori laughed.

Battling back, I quickly said, "Don't you really dig 'Moody's in the Mood for Love'?"

"Yes," she replied, and her speaking to me filled me with hope.

"Wanna dance?"

"Okay."

Okay! What poetry! And she had said it to me!

Nervously, I put my arm around her and began to lead her in a—something. Was "Moody's Mood for Love" a fox trot, rhumba, or waltz? The answer, of course, was irrelevant because I didn't know any of them; I was still trying to master the march. Whatever it might have been, "Moody's" was a dance for only the fastest feet. I was fast, but between sewers—with a football, not a girl, in my arms.

Nevertheless, I felt such desire to win this prize that I did something bold to hang on to the beat.

"Hey," I said, "you wanna lead?"

"The boy is supposed to lead," she replied.

"Yeah, but I thought I'd give you a crack at it; I really like you. Listen, Lori... before we dance—no matter who's in charge—I gotta ask ya somethin'."

"Yes?" she replied.

"You think... you think somebody's gotta be a special age to be in love?"

"Well, over eleven, I guess."

I now was two years over eleven, so this rapture was overdue. And it needed no Spanish Fly, that magic dust for athlete's foot that I had tried to use in a recent rite of passage at Fat Albert's, a rite with none of the romance that now was turning me dizzier than usual.

"Listen... d'ya happen to be goin' steady right now?" I said.

"We barely know each other, Bill. You have to get to know somebody."

"Oh, we could certainly do that too. So you'll think about it, right? I don't need an answer right away. I'm not askin' other people."

"Why don't we just dance? I'll lead."

"Hey, thanks. You think anybody'll know? I mean, it's hard to tell who's doin' the pushin', right? You hafta know geometry."

"You're a funny boy," she said with a smile, "but you've got a good mind."

"A good mind to what?"

"Let's dance."

As I led her out to the floor so that she could start leading me, I could clearly hear, above the music, manhood calling to me:

Buck-buck number one, come in.

EXHIBIT 8

[DVD ATTACHED]

EXHIBIT 8

EXHIBIT 9

#1 NEW YORK TIMES BESTSELLING AUTHOR

BILL

COSBY

I DIDN'T ASK TO BE BORN

Illustrations by George Booth

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Page 59—From the Joseph A. Ferko website: Since 1922, the Joseph A. Ferko String Band has been entertaining audiences the world over. A participant in Philadelphia's annual Mummers Parade, The Ferko String Band boasts the most successful record in the history of the parade.

Page 114—American historian Howard Zinn (August 24, 1922–January 27, 2010) was a Professor of Political Science at Boston University for over 20 years and a noted author and intellectual.

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AUTHOR'S NOTE

All of my performances and writings have been inspired by my experiences, which, I believe, give an honest and truthful picture of life. My observations are not bread crumbs. They do not dissolve. They are on record, on film, printed in books, and found on the Internet. I am happy to share them. For this I was born. And I'm glad I was. Although in my early years, I was pitiful.

EXHIBIT 10

The Bill Cosby sexual abuse claims – accusation by accusation

A total of 17 women have come forward with allegations of sexual abuse at the hands of the popular comedian – allegations that Cosby denies

Nicky Woolf in New York

Tuesday 16 December 2014 11.48 EST

Over the last few weeks, at least 17 women have put their name to accusations of sexual abuse against Bill Cosby. The comedian and his lawyers have long denied the allegations, renewed interest in which has led to the cancellation of his planned NBC sitcom next year and several live appearances.

These are the women and the dates their accusations became public:

2 March 2000

Lachele Covington, a 20-year-old actress, filed a police report accusing Cosby of touching her inappropriately after a dinner at his house, according to the New York Post. The district attorney's office decided that no crime had been committed.

13 January 2005

Andrea Constand, a former college athlete, went to the police to report an incident involving Cosby, saying that the comedian had drugged and assaulted her. After the district attorney decided that he thought he did not have enough evidence to convict, Constand filed a civil suit against the comedian, which was settled out of court in 2006. A reported 13 unnamed "Jane Doe" witnesses, as well as one named witness – Tamara Green – did not get the opportunity to testify in court.

10 February 2005

Tamara Green, a lawyer in California, was the only witness to prior sexual assaults in the Constand civil suit to allow herself to be named. In February 2005, she spoke to NBC's Matt Lauer on the Today show, saying that in the 1970s Cosby drugged her with what she was told was cough medicine, then took her to her apartment and groped her. She told the Guardian "he was like a spider, sitting there waiting".

23 June 2005

Beth Ferrier, one of the anonymous “Jane Doe” witnesses in the Constand suit, came forward to the Philadelphia Daily News while the suit was still ongoing about an alleged incident in which Cosby drugged her in Colorado in the 1980s.

18 December 2006

Barbara Bowman, an aspiring actress who was 17 when Cosby first met her, was another of the “Jane Doe” witnesses in the Constand suit, but came forward to People magazine, saying that Cosby drugged and abused her on multiple occasions.

17 November 2014

Joan Tarshish came forward in an interview with CNN’s Don Lemon, saying that Cosby drugged her and sexually abused her on two occasions. She told Lemon that in 1969, when she was 19, Cosby made her a drink. “Shortly after that I passed out,” she said. “I woke up ... with him removing my underwear.”

17 November 2014

Linda Joy Tritz posted on Facebook that in the 1970s, when she was 19 and working at a restaurant, Cosby drove her to the beach and offered her pills from “a briefcase filled with assorted drugs”, and then became “sexually aggressive” with her. “He offered me pills and said it would help me to relax, and I kept refusing but he kept offering,” she told the Washington Post.

18 November 2014

Janice Dickinson, a supermodel and TV star, told Entertainment Tonight that Cosby had drugged and sexually assaulted her in Lake Tahoe in 1982.

19 November 2014

Therese Serignese came forward to WBTV in West Palm Beach, Florida, saying that Cosby drugged and then had sex with her after a party in the 1970s, when she was 19. She was another “Jane Doe” witness in the Constand case.

20 November 2014

Renita Chaney Hill told a CBS affiliate in Pittsburgh that she had met Cosby in the 1980s, when she was 15, and an aspiring model and actress. She said that Cosby flew her to “a number of cities” around the country, where she would be summoned to his hotel room at night. Once there, she said, he would insist that she have a drink, which she said she believes was drugged.

20 November 2014

Carla Ferrigno, a former Playboy bunny and the wife of Incredible Hulk star Lou Ferrigno, accused Cosby of grabbing her roughly at his home in Hollywood in 1967. Her accusation

appeared in the Daily Mail.

20 November 2014

Louisa Moritz, an actress who starred in the 1970s TV show *Love American Style*, also came forward on 20 November. She told TMZ that Cosby attempted to force her to give him oral sex in the green room before an appearance on Johnny Carson's *Tonight Show* in 1971.

21 November 2014

Andrea Leslie, a model and actress from Warren, Michigan, alleged in an interview with the *New York Daily News* that in 1992 he summoned her to his hotel room in Las Vegas, claiming it was for an audition, poured her a drink and demanded she act drunk. She said she came out of the bathroom to find him naked on a bed, and said she now suspects the drink was drugged.

21 November 2014

Kristina Ruehli told *Philadelphia Magazine* that she met Cosby in 1965, when she was working as a secretary at a talent agency. She said that he invited her to his house, where he drugged her and tried to force her into oral sex. Like Serignese, Bowman and Ferrier, Ruehli was a "Jane Doe" witness in the Constand case.

22 November 2014

Victoria Valentino, a *Playboy* bunny, told the *Washington Post* that Cosby drugged her after dinner in Los Angeles, along with another actress, Meg Foster. She said that he drove the two of them to his apartment, where he forced her to perform oral sex on him.

22 November 2014

Joyce Emmons, a comedy club operator, told TMZ that in the 1970s Cosby gave her a white pill for a migraine, and that she later woke up in bed with a friend of his. She said that Cosby told her later the pill was a quaalude, a recreational sedative-hypnotic popular at the time.

24 November 2014

Jewel Allison, a former model, alleged in an interview with the *New York Daily News* that Cosby gave her a drugged glass of wine and forced him to put her hands on his genitals.

11 December 2014

Beverly Johnson, an actress and supermodel, wrote a long piece for *Vanity Fair* in which she said that Cosby drugged her after a dinner in the mid 1980s, having invited her to read for a part in *The Cosby Show*. She said that her body went into "automatic survival mode" after he came over and put his hands around her waist and that she started yelling at Cosby, calling him a "motherfucker." She said that she did not go public with the story at the time

because she was worried that her career would suffer.

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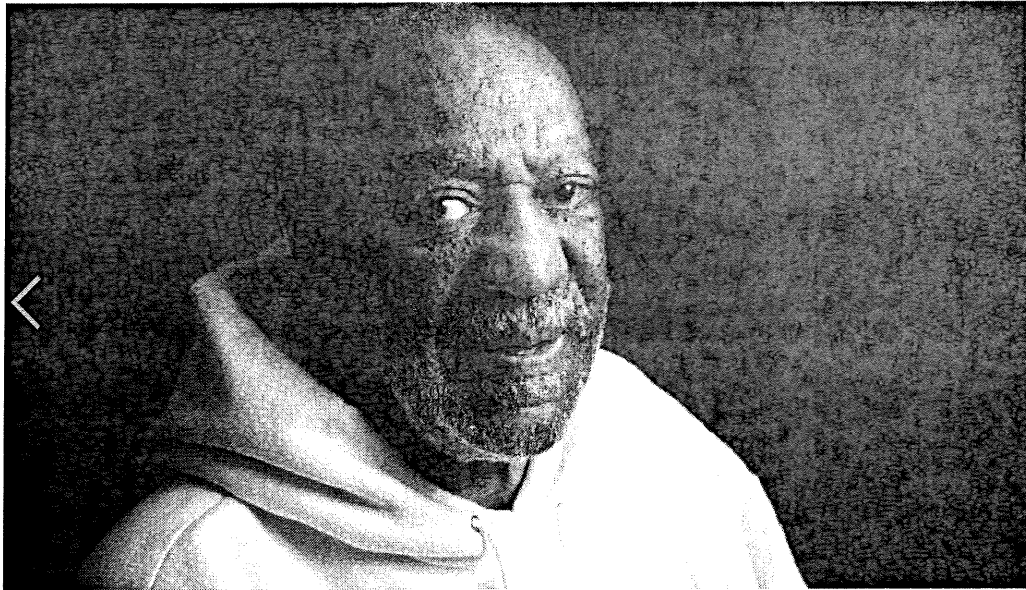
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EXHIBIT 11

By Ralph Ellis, CNN

Updated 11:38 AM ET, Wed July 22, 2015



26 photos: Who are Cosby's accusers?

More than 40 women have spoken out to various media outlets about allegations of sexual misconduct by Bill Cosby. Here are 25, in chronological order, who have spoken with CNN, spoken on camera about their allegations or been the subject of responses from Cosby's attorneys. Read more on the allegations and Cosby's denials.

1 of 26

Hide Caption

Story highlights

NEW: Accuser: Cosby "sends a very wrong message about what consent really means"

The deposition stems from a lawsuit filed by Andrea Constand in 2005

Dozens of women have publicly accused Bill Cosby of sexual assault

(CNN)—Bill Cosby said he had sexual relationships with at least five women outside his marriage, gave prescription sedatives to women he wanted to have sex with and tried to hide the affairs from his wife, according to a court deposition obtained by CNN.

The deposition, first reported by The New York Times, was taken 10 years ago and stems from a civil lawsuit filed by Andrea Constand -- one of over two dozen women who have publicly accused the comedian of sexual assault over four decades. Many have alleged Cosby gave them some sort of drug without their knowledge.

CNN independently obtained a copy of the full deposition.

Cosby, 78, has never been criminally charged and has vehemently denied wrongdoing. In the deposition, he says the sex and drug-taking were always consensual.

When reached for comment Sunday, Cosby publicist Andrew Wyatt said, "No comment at this time." Constand also said she had no comment.

And Constand attorney Dolores Troiani said she could not comment due to the confidentiality of the lawsuit settlement. CNN has not been able to obtain Constand's deposition.

Intense questioning



In the 2005 deposition, taken in a Philadelphia hotel, the wealthy and popular entertainer faced intense questioning about how he conducted relationships with women. For instance, Troiani asked about a model he met more than two decades ago at a club in Denver.

Cosby: We had sex and we had dinners and sex and rendezvous.

Troiani: What are rendezvous?

Cosby: Rendezvous is when you call somebody and say, do you want to be at such and such and they say yes and you go there.

Troiani: Is there sexual contact associated with the rendezvous?

Cosby: There was with (the woman) every time.

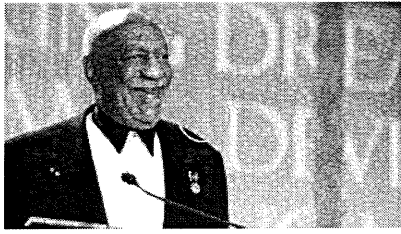
The woman alleged Cosby drugged a cup of coffee and had sex with her while she was unconscious.

Troiani: She says that she was in a car and that when she awoke her clothes were a mess, her bra was undone, her top was untucked and I was sitting there going, oh, my God, what happened. Do you recall anything such as that ever happening

Related Video: Bill Cosby describes sexual advances in deposition 03:05

with her?

Cosby: I wasn't there.



Related Video: New accuser: Cosby can't stop 06:36

Earlier this month, a judge released a memorandum of law relating to the Constand lawsuit which contained portions of the deposition in which Cosby admitted to getting prescription Quaaludes to give to young women he wanted to have sex with.

In those earlier documents, Cosby says he gave Constand one and a half tablets of Benadryl -- an over-the-counter antihistamine that can cause drowsiness -- to relieve stress.

Bill Cosby admitted to getting Quaaludes to give to women

Cosby says he obtained a prescription for the sedative Quaaludes from a Los Angeles doctor, ostensibly for a bad back. But Cosby said he never used the drug because it made him sleepy.

"Quaaludes happen to be the drug that kids, young people were using to party with and there were times when I wanted to have them just in case," he said.

For instance, Cosby said he was introduced to a young woman at the Las Vegas Hilton in the 1970s.

"She meets me backstage," he said. "I give her Quaaludes. We then have sex. ... I think she may very well have been very happy to be around the show business surroundings."

Constand's lawyer said, "She said that she believes she was not in the position to consent to intercourse after you gave her the drug. Do you believe that is correct?"

"I don't know," Cosby replied.

"Why don't you know?"

"That's her statement," he said. "I don't know. How many years ago are we talking about? Nineteen seventy what?"

Twenty years later the woman contacted Cosby and asked for money, saying he'd promised her \$500 for every A she earned in school, Constand's lawyer says in the deposition.

Cosby said he thought the woman was broke and gave her a total of \$10,000.

When Constand's lawyer asked who Cosby wanted to hide the payments from, he replied: "Mrs. Cosby."

Cosby said he imagined his wife would have known he was also giving Constand money, to pay for her education, but not because they'd had sex -- and Constand was now upset, he said in the deposition. In her lawsuit, Constand alleged she was the victim of nonconsensual sex.

First meeting

In the deposition, Cosby mostly discusses his relationship with Constand but describes sexual relationships with at least five women in different cities across the nation, in hotels and in one of his homes.

Constand was a staffer for the women's basketball team at Cosby's alma mater, Temple University, when she visited Cosby's Pennsylvania home in 2004. She told police in her home province of Ontario in January 2005 that Cosby gave her medication that made her dizzy and she woke up to find her bra undone and her clothes in disarray.



In the deposition, Cosby says he first met Constand at a Temple athletic facility where he showed her a back-relaxation technique.

"It's one where she gets on my back with her back and her arms come under mine and I grab her and I say, now you relax," the deposition quotes him as saying. "And her legs are hanging out in the air and I go up and down and I give that jolt and it's supposed to line the vertebrae."

She talked about wanting a tighter butt, he said, so he touched it.

"It wasn't a sexual opening," he said. "It's a woman who is working with basketball players, who used to be a jock, who also got on my back and is like that and she was very comfortable about that."

When asked how he caused a romantic relationship to develop, Cosby said he acted as a mentor, "Inviting her to my house, talking to her about personal situations dealing with her life, growth, education access and thoughts to how to acquire a more aggressive attitude, protecting oneself in business."

Cosby said he always looked for nonverbal clues that women welcomed his sexual advances.

"I think I'm a pretty decent reader of people and their emotions in these romantic sexual things, whatever you want to call

them," he said in the deposition.

Though sometimes argumentative and seemingly evasive with Constand's lawyer, Cosby described a sexual encounter in such detail that it took several deposition pages. He said he and Constand were sitting on a sofa when he touched her stomach.

"I don't hear her say anything," he said. "And I don't feel her say anything. And so I continue and I go into the area that is somewhere between permission and rejection. I am not stopped."

Constand went to authorities with her allegations in January 2005, but in February of that year authorities -- citing a lack of evidence -- said no charges would be filed against Cosby.

Similar stories

Cosby eventually settled Constand's suit in which 13 "Jane Does" had similar stories of sexual abuse. The suit was settled under confidential terms in 2006.

Since then, more than 25 women have publicly accused Cosby of raping or assaulting them over the past 40 years. He has never faced criminal charges, partly because almost all the accusations fall outside statutes of limitations.

Cosby talked about his philosophy of sex in the deposition, saying he tried to avoid sexual intercourse because he didn't want women falling in love with him.

Cosby accuser: His claim 'makes me sick'

Barbara Bowman, who said Cosby raped in her in the 1980s, said she was relieved to see the deposition come to light.

"The first thing that came to my mind was 'finally,'" Bowman told CNN's "New Day" on Monday. "After all of the years that I have been screaming my story ... it was a wonderful day."

But she said she was disgusted by Cosby's claim in the documents that sex was consensual.

"It makes me sick, and it sends a very wrong message about what consent really means," Bowman said.

"Consent is not the absence of a 'no.' And when you put drugs and alcohol in the mix, and put a person into a state of impairment and incapacitation where they're not able to respond in a normal setting, it's manipulative. It's diabolical. It's controlling. And it's typical behavior and thinking of a sociopath."

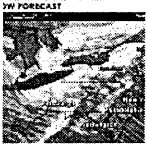
CNN's Laura Ly, Jean Casarez, Janet DiGiacomo, David Shortell, Holly Yan, Ashley Fantz, Haimy Assefa and Kristina Sgueglia contributed to this report.



Ohio machete attack: Man injures 4 at restaurant in Columbus



Transgender athlete Chris Mosier's fight to compete



Record lows in Northeast expected this weekend

EXHIBIT 12

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NEW DAY

Interview with Cosby Attorney Monique Pressley; Sandra Bland's Voicemail from Jail; Family Demands 'Transparency' In Sandra Bland Investigation. Aired 8:30-9a ET

Aired July 23, 2015 - 08:30 ET

THIS IS A RUSH TRANSCRIPT. THIS COPY MAY NOT BE IN ITS FINAL FORM AND MAY BE UPDATED.

ALISYN CAMEROTA, CNN ANCHOR: We want to bring in Monique Pressley, an attorney for Bill Cosby. Thank you for being on NEW DAY.

MONIQUE PRESSLEY, ATTORNEY FOR BILL COSBY: Thanks for having me. Good morning.

CAMEROTA: It has been a challenge for the past nine months to cover this story without hearing from Bill Cosby.

[08:30:04] So what does Mr. Cosby say about these now more than 25 women who have come forward to accuse him of sexual assault and rape?

PRESSLEY: I'm not certain what you mean by saying that you never hear from Bill Cosby since, through his attorneys, he from the very beginning has denied repeatedly the accusations and allegations that have been lodged against him.

CAMEROTA: We have had written statements from the attorneys. You are the first person we are able to speak to live. But we haven't heard from Bill Cosby personally. So I'm wondering what has he told you about these accusations?

PRESSLEY: And certainly I'm not going to reveal client confidences on counsel for Mr. Cosby and anything that he says to me is said in confidence. But when his attorneys speak, we're speaking for him. So when we speak and say that he denies all of the allegations and accusations, then that is the statement of Bill Cosby.

And when you look at the recent filings just as recently as two days ago in another case in Pennsylvania, those are the statements of Mr. Cosby. It's not necessary for him to do anything more than what he is doing, which is relying on able counsel to speak for him in a situation where he, one, has neither been charged with nor, two, convicted of any crime.

So even though we hear excerpts from accusers and we see headlines that discuss things like calling him a rapist or saying that he has committed sexual assault, the case actually is in a civil court and there are no criminal charges filed. And I think it is important, no matter what manner the attorneys are speaking for him or the media is covering it, that that's a point that stays clear.

CAMEROTA: It's not just excerpts from accusers. We have heard Mr. Cosby in his own words. These are revelations that have come out of this deposition from the 2005 Andrea Constand case. One of the big headlines from that is that Bill Cosby admits that he got seven prescriptions for the powerful sedative called Quaalude not so that he could use them, but so that he could give them to women that he wanted to have sex with. And we have heard from the accusers that he did give them a powerful sedative, so powerful that they could not consent to sex with him. What is your response to that revelation?

PRESSLEY: And it's not really a revelation that Quaaludes were used in the '70s. They were commonly used as a partying drug and they were also known to be used to increase sexual arousal. And Mr. Cosby admitted in his deposition to offering one person, who he was in a relationship with, Quaaludes during that time period and that that person accepted it.

And so when we see, again, excerpts saying that is a powerful sedative but not talking about the fact that it was also a commonly used party drug during the '70s.

CAMEROTA: Not by these women. Ms. Pressley, I have interviewed 11 of the accusers. None of them were Quaalude users. Furthermore, none of them consented to

using Quaaludes. They accepted a drink, sometimes a cappuccino, not even an alcoholic drink, and afterwards became unconscious. Then --

(CROSSTALK)

PRESSLEY: The interesting part about you saying that you have interviewed them and then you accept what they said is true. However when you listen to the denial of the accusations by Mr. Cosby through his attorneys repeatedly from the beginning, that's looked at it and scoffed. To me --

CAMEROTA: So why did he get seven prescriptions for Quaaludes? That sounds like more than just one woman that he offered a Quaalude to. That sounds like he wanted to give them to women. And in fact, in his own words, he says they were for the purpose of giving to women. Plural.

PRESSLEY: And what you are discussing is not a crime, for a person to offer a substance in a consensual relationship to a person with knowledge, and for them to choose to accept it is not criminal. It isn't even new actually for that to happen.

CAMEROTA: Sure. They said that they had no choice, that he slipped it to them. What is his response to that?

PRESSLEY: And as he said a number of times, that's been denied that, one, that he ever slipped without a person's knowing, male or female, a drug of any sort to them. And, two, that there was ever, between him and any other adult, nonconsensual sex. Those two things.

And actually if you look at the manner in which the people who are lodging the accusations have done so, we're seeing cases that come forward 10, 20, -- and even 40 such as the California case -- 40 years later where it leaves the very precepts of our justice system unable to be followed through. What do I mean? We go to a court of law to determine how to mete out justice. We go there to figure out what is true and false.

CAMEROTA: Yes, you're right.

PRESSLEY: And we can't do that in these cases.

CAMEROTA: Yes, the statute of limitations has passed for these women.

[08:35:00] That is true. They say that at the time --

PRESSLEY: They didn't pass four of the women. But it didn't pass four of the women. But they chose to not come forward until after --

CAMEROTA: That's not exactly right.

PRESSLEY: -- the statute of limitations.

CAMEROTA: They say that they did try to get attention for what happened to them in the '70s and the '80s. They told friends, they told employers, they told lawyers, and all of them advised them don't mess with one of the most powerful men in the world.

But let me ask you this, Ms. Pressley. Why do you think in that case, if you don't believe any of these women's accounts, why do you think more than 25 women would be coming forward to tell this very private and very upsetting account? You think they're all lying?

PRESSLEY: Here is the important and critical fact. It's not about what I believe. It's not about what I think. It's not about even what the truth of the matter is 40 years later when we have no way of accessing witnesses who could verify the fact.

The important matter is that, in our system in the United States, and I love this about our country, we have a way for people who are accused of a crime to actually step forward and defend themselves. And for people who are accusing or bringing allegations to prove them in court.

CAMEROTA: Of course.


PRESSLEY: And when that system doesn't work --

CAMEROTA: But times are different now, as I think you'll admit. But you say it's not about the truth of the matter. It is about the truth of the matter. Do you believe these women or do you think that they're liars?

PRESSLEY: I am here as counsel for Mr. Cosby. I'm not here to assert a personal belief, nor am I here to call them names. What I'm here to say is that, in this country Mr. Cosby is, one, innocent until proven guilty and, two, because of no fault of his own these women did not come forward there will not be an opportunity for him to disprove claims that are four decades old.

CAMEROTA: OK, next -- PRESSLEY: And I think that the fact that the sheer volume of the number of people who have come out is increasing others' ability to then be tagalongs and say, OK, if one is getting away with lodging accusations with no proof, then perhaps two can, then perhaps ten can, but that does not make it so.

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... forward. This is the one that involves a 15-year-old who she claims was sexual assaulted at the Playboy Mansion. And in fact, Gloria Allred, her attorney, says that she will -- she expects to depose, to be able to depose Mr. Cosby in the next 30 days. Will he appear for that deposition?

PRESSLEY: Well, I read the press release by Ms. Allred and I understand that that is her hope and her intention. But what this California Supreme Court did was really just put this case at the beginning posture that it was in. They were ruling on a technical issue about whether the case -- the filing could be amended or not. And they said that that would not be heard.

CAMEROTA: But if called to give a deposition, will he give a deposition?

PRESSLEY: An certainly I'm not going to reveal strategies, tactics, or intentions of my client to testify or not or advice of counsel about that matter. We will deal with that with the able counsel who are in California who are handling this case.

CAMEROTA: I mean, you've been saying that you need him to -- that this has to be aired in a court of law. This is the opportunity. This is the opportunity next month for this to happen in a court of law. This is what you say Mr. Cosby has been waiting for. Will he be heard in a court of law?

PRESSLEY: And I what I said to you is that, through the court system, when court cases are brought appropriately, then it's handled by the defense and by the plaintiffs in the manner that it is supposed to be. And that means that they make all of the decisions that are available to them in a court of law. That doesn't mean that I'm going to sit here today and tell you what I advise Mr. Cosby to do or what his Los Angeles counsel would advise him to do. Or what his intentions are.

It means that that's the forum. That the forum is not headlines from 70 years ago with one question and one answer from a deposition about the use of a party drug. Instead, we will see, in the courtroom in this case and in others, whether a defamation suit can hold up for a person who speaks up and says I deny the claims that are being lodged against me. We will see whether this claim that the police refused to prosecute will also become frivolous to the court in a civil case.

All of those are things that we'll find out in time. And I know that that is the way that the system should work, and I pray that it will work that way in this case.

CAMEROTA: We will be watching along with you. Monique Pressley, thanks so much for being on NEW DAY.

PRESSLEY: Thanks so much for having me.

CAMEROTA: Let's get to Michaela.

MICHAELA PEREIRA, CNN ANCHOR: All right, for the first time, we are hearing from Sandra Bland while she was in police custody. She was arrested after a confrontation, found dead in her jail cell some three days later. Ahead, you're going to hear the voicemail that she left a friend.

[08:40:00]

(COMMERCIAL BREAK)

PEREIRA: All right, here we go with the five things to know for your NEW DAY.

At number one, there's new information in Sandra Bland's death. Jail records indicate that she previously attempted suicide. Police say Bland killed herself in a Texas jail

cell three days after she was arrested during a traffic stop.

Donald Trump telling the Hill he would consider seriously a third party run if the RNC is not fair to him. The real estate mogul expected to tour the U.S./Mexico border today after making those divisive comments about Mexican immigrants.

A sex assault lawsuit against Bill Cosby is going forward despite the embattled comedian's actions to get it dismissed. The accuser says Cosby assaulted her back in 1974 when she was just 15 years old.

The Obama administration drafting another plan to close Guantanamo Bay. It is a promise he first made when he first took office in 2009. Since then, his plan has hit many road blocks.

A federal grand jury has indicted the gunman in the South Carolina church shooting on hate crime charges. He is accused of killing nine black church members in Charleston last month.

For more on the five things, be sure to visit newdayCNN.com for the latest. Chris.

CHRIS CUOMO, CNN ANCHOR: A haunting voicemail left by Sandra Bland. For the first time, we are hearing from her while in custody. You are going to hear the message that she left a friend before she died coming up.

[08:44:48]

(COMMERCIAL BREAK)

(BEGIN AUDIO CLIP)

SANDRA BLAND, DIED IN TEXAS JAIL CELL: I'm still just at a loss for words, honestly, about this whole process. How does switching lanes with no signal turn into all of this? I don't even know. Um, but I'm still here so I guess call me back when you can.

(END AUDIO CLIP)

PEREIRA: "I'm still here." That was a voicemail Sandra Bland left for her friend while in a Texas jail. Bland was found dead in that jail cell three days after she was arrested by a state trooper during a traffic confrontation. Police say she committed suicide. A jail report indicates she said she had tried to kill herself before.

Joining us for one of our conversations, Charles Blow, CNN political commentator and op-ed columnist for "The New York Times." Carlos Watson is here, CEO and co-founder of OZY.com.

It's haunting to hear her say those words. "I'm still here." Carlos, does it sound to you like a woman at her wits end about to end her own life?

CARLOS WATSON, EDITOR-IN-CHIEF, OZY.COM: It doesn't and you can't be surprised when you hear the sister or the lawyer say that they have great hesitation, not only because of the edited tape that we saw, the video tape, but because of some of the other things that have happened.

PEREIRA: Other discrepancies.

WATSON: Other discrepancies in that case and other case. In fact, I thought Charles had an outstanding column where he talked about five or six substantive questions.

PEREIRA: So when you hear that, what comes up to you?

CHARLES BLOW, CNN POLITICAL COMMENTATOR: Well, I mean - Right. It doesn't sound like it, right, and so I think a lot of us are questioning kind of mood and motivation. However, as someone - you know, I wrote a memorial about having suicide ideation as a very young boy and it can seize you in a moment and it doesn't take a lot of -- you don't mope around, necessarily.

PEREIRA: But you are not obviously telling people about it.

[08:50:00] BLOW: I was quite literally at a skating rink having the best -- time of my life. So you don't -- it doesn't always line up. So I try not to read too much just into that particular comment. Also, I think that that is important to remember in this entire case, you know, not to get so connected to a set of beliefs that you are not open to a set of facts.

Forensics has evolved as an incredibly sophisticated area of inquiry. It is really hard to hide, you know, how someone dies, particularly if that person -- you still have the body, you still have the room and you have the body shortly after the person dies.

PEREIRA: And we're going to see what because we know an autopsy was done, we know a toxicology report is pending. So those will fill in some blanks because, as you mentioned, there are discrepancies we are seeing and there's these details that are emerging. For example, the fact that they released the fact that there was marijuana in her system, a great deal of marijuana in her system. Should that matter here? And are you concerned, Carlos, that this could be part of the narrative here?

WATSON: I think you -- Early on today you were talk to Judge Duhon who raised that, as well, and I think your question was, would that yet lead her to suicide? How long could that have been in her system? But I think - as Charles said - I think you have to let it all play out. I think the family is right to ask for an independent autopsy to see where that comes from. I think it was interesting to hear Duhon try and separate himself from the Texas Department of Public Safety.

PEREIRA: Yeah. But they've had their own troubles there, though, too.

WATSON: Sure.

PEREIRA: We know that in that sheriff's department or in that police department, the police department, the chief, actually had left in 2008. Apparently there were charges of police brutality, charges of racial discrimination. He is now the sheriff and he now, Charles, is in charge of Sandra Bland's death. Does it point to the fact that this conversation about getting an independent investigator prosecutor in here, is that going to come up again?

BLOW: I think what it points to is kind of people's loss of faith in the system. I think that all of the questions - I mean, the questions I raised today in my column - These are not necessarily to say, oh, she didn't commit suicide -- I don't know if that happened or not happened. I think that we will absolutely find the answer to that. I do believe, however, you know, the kind of bungling sense of not having answers to very basic questions leads to a suspicion that is very dangerous for our system of justice in America.

PEREIRA: Well, and it makes it difficult when we hear and we see the tape of the initial stop. The fact that she was stopped -- you can be stopped for not making a signal when you are changing lanes. We have all done it. OK, raise a hand. Who has done that once or twice?

BLOW: How many times do I got to raise my hand? Like a million?

PEREIRA: Right - Yeah, I know. But the fact is, the fact that she was then told, Carlos, to get out of the car because she wouldn't extinguish her cigarette, I mean -- and the fact that the tape jumps and we don't know if that was a glitch -- we all work in TV, we all know that can happen -- or was there something more sinister there?

WATSON: Michaela, you know what's interesting here, President Obama, first sitting president to visit a prison recently, you've seen Senator Cory Booker on the Democratic side, Rand Paul on the Republican side going and talking about prison reform. But really, the question is for the first time in 40 years, will there be a serious conversation about police reform?

And you remember 40 years ago it was about corruption in our police department, "Serpico," the famous movie, the book kind of captured that. But you wonder whether Sandra Bland and a whole series of other things will finally be a conversation about the training of young police officers, how you de-escalate in certain situations and what is the difference between authority and commanding versus influence?

PEREIRA: Interesting conversation we can have there. I can't let a moment pass with the two of you, with brilliant minds here with me. We have been talking an awful lot about Trump today and you both have been very vocal, writing columns, tweeting, etc. about this so-called "Trump effect." Well, he is headed to the border today. I'm curious, first of all, what you make of the trip, what you think is going to happen there, what it will net, and his comment about blacks love him. Go. React.

WATSON: Charles, do you -

(LAUGHTER)

PEREIRA: Do you love Donald Trump?

BLOW: Listen, let me tell you - It's a quick story, right. I have only met Donald Trump one time, right, and so - It was a cocktail party. He walks in and someone introduces him to me. And I don't know him - I know him but he doesn't know me at all. And he launches into this thing about how black people love him. It was the most bizarre thing I have ever heard in my life and about like how all the hip hop people are trying to get him to run. This is the last election cycle, not this election cycle. I find that -

PEREIRA: Were you the black guy there?

BLOW: I was -

(CROSSTALK)

BLOW: -- the black guy. And thought it -- particularly odd because, you know, I am of the mind that that, as a journalist, that sends off red signals to me because when -- you have to be that demonstrative about who likes you.

(CROSSTALK)

PEREIRA: How about you, Carlos? (INAUDIBLE).

WATSON: Look, I think the Donald has been the best candidate so far on the Republican side -

BLOW: For Hillary.

WATSON: -- meaning the most interesting. You know what? He is thinning out the Republican field. He, along with that first debate, is thinning out the field.

[08:55:02] Remember, this time four years ago we were talking about Michele Bachmann and Herman Cain. So this is the early audition season and the question is, can he last longer? Can he go as long as Howard Dean did, who at the time was seen as quite a hot candidate, or will he even go as long as Ross Perot? He was a third party, you guys talked about that today.

PEREIRA: There will be plenty of fodder for us to watch and listen to and soundbites galore. Carlos, Charles, men of similar names but very different takes - Well, not so much actually. Great talking to you both. Thanks so much. We got "The Good Stuff" coming your way up ahead.

(COMMERCIAL BREAK)

CUOMO: "Good Stuff." 11-year-old Logan Fairbanks, he and his pop, they post videos pranking each other online. It's funny but the comments on the videos are not funny. Mean, awful comments all too often directed at the cute kid on your picture. So we decided to do something about it. As painful as it was, he read the comments directly to camera. The question is why?

(BEGIN VIDEO CLIP)

LOGAN FAIRBANKS, TOOK ON BULLIES IN VIRAL VIDEO: I hope that people don't bully other people online anymore. And people that have been bullied, don't let these words effect you.

(END VIDEO CLIP)

CUOMO: A million views. One of them was Valerie Jarrett, the presidential adviser. She tweeted Logan, "You are stronger than anyone's hurtful words. If you are ever in D.C., please stop by the White House. "

So that's exactly what happened.

CUOMO: Oh my gosh.

PEREIRA: He went! That's so great.

CUOMO: That's great. That's a great outcome.

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TELEVISION

Cosby Team's Strategy: Hush Accusers, Insult Them, Blame the Media

By **LORNE MANLY** and **GRAHAM BOWLEY** DEC. 28, 2014

In 2005, when Tamara Green told the “Today” show and The Philadelphia Inquirer that Bill Cosby drugged and sexually assaulted her in the early 1970s, one of Mr. Cosby’s lawyers publicly branded the allegations “absolutely false,” while his aides approached another newspaper with “damaging information” about her, according to court documents.

Five years earlier, after an actress on Mr. Cosby’s TV series “Cosby” told the police that he had tried to put her hand down his sweatpants at his New York townhouse, Mr. Cosby’s lawyers threatened The National Enquirer with a \$250 million defamation suit for publishing detailed comments about the incident by the woman’s relatives.

And when Mr. Cosby acknowledged an extramarital affair in a 1997 interview with Dan Rather, his agent telephoned the president of CBS Entertainment to demand that the segment not air on “60 Minutes” as planned. It did not, although CBS News said the decision had nothing to do with the call.

As accusations of sexual assault continue to mount against Mr. Cosby — more than two dozen women have gone public, the latest last Monday — the question arises as to why these stories never sparked a widespread outcry

before. While many of the women say they never filed police complaints or went public because they feared damaging their reputations or careers, the aggressive legal and media strategy mounted by Mr. Cosby and his team may also have played a significant role.

An examination of how the team has dealt with scandals over the past two decades and into this fall reveals an organized and expensive effort that involved quashing accusations as they emerged while raising questions about the accusers' character and motives, both publicly and surreptitiously. And the team has never been shy about blasting the news media for engaging in a feeding frenzy even as the team made deals or slipped the news organizations information that would cast Mr. Cosby's accusers in a negative light.

Playing hardball with people who make (and report on) incendiary claims is hardly a new tactic in the celebrity world. But given the volume and severity of the recent charges, with numerous women saying Mr. Cosby drugged and then sexually assaulted them, some legal and public relations practitioners question the wisdom of continuing to counterpunch.

"Sometimes in a case like this, less can be more," said Benjamin Brafman, a criminal defense lawyer who represented Dominique Strauss-Kahn. "Attacking someone who is perceived to be a 'victim' can often be unproductive."

"I would suggest," Mr. Brafman added, "a softly spoken denial rather than an outspoken challenge to the integrity of the women now coming forward. Simply put, it may be better to say nothing than try and engage so many."

The team behind Mr. Cosby's longtime strategy has included John P. Schmitt, a lawyer from the New York law firm Patterson Belknap Webb & Tyler; Norman Brokaw, Mr. Cosby's longtime agent at the William Morris Agency until late 2012; and Norman's son David Brokaw, who has been Mr. Cosby's publicist for 40 years. In addition, at several critical moments over the past few decades, Mr. Cosby has called on Martin D. Singer, an \$850-an-hour

lawyer with a reputation for playing rough on behalf of clients like Charlie Sheen and Arnold Schwarzenegger when they found themselves embroiled in controversy.

“He is a bulldog,” David R. Ginsburg, executive director of the entertainment, media and intellectual property law program at the U.C.L.A. School of Law, said of Mr. Singer.

Mr. Singer’s intensity was on full display in the first week of December after Judy Huth filed a civil suit in Los Angeles Superior Court, alleging that in 1974, when she was 15, Mr. Cosby plied her with drinks and forced her to perform a sex act on him in a bedroom at the Playboy Mansion.

In court papers, Mr. Singer said Ms. Huth’s claim was “meritless” and nothing short of “a shakedown.” According to Mr. Singer, Ms. Huth and her lawyer had first demanded money to keep them from going public and Ms. Huth had tried unsuccessfully to sell the allegations to a tabloid 10 years earlier. (Ms. Huth’s lawyer did not respond to a request for comment.)

It was not the first time that the word “shakedown” had been used to describe the motives of those coming forward with accusations of sexual abuse by Mr. Cosby.

Back in 2005, after Andrea Constand, a Temple University basketball manager, told the police in Pennsylvania that Mr. Cosby had drugged and sexually abused her at his home in Pennsylvania the year before, a story appeared on “Celebrity Justice,” a TV show and website created by the founder of TMZ. “Sources connected with Bill Cosby,” the show reported, said that before Ms. Constand had approached the police, her mother had asked Mr. Cosby to “make things right with money.” The show went on to say that a Cosby representative had called this “a classic shakedown.”

Mr. Singer was the Cosby representative in question, another member of Mr. Cosby’s legal team said at a court hearing in 2005, and the next year Ms.

Constand sued him for defamation. (Her lawyers denied the charge at the time.) That suit and Ms. Constand's suit against Mr. Cosby were later consolidated and settled confidentially.

Mr. Singer declined to comment for this article.

Mr. Schmitt, who has been a lawyer for Mr. Cosby for more than 30 years, has also played a significant role — both behind the scenes and publicly — perhaps most notably in beating back the accusations of Autumn Jackson, who claimed to be Mr. Cosby's daughter. When Ms. Jackson, in 1997, threatened to sell the story to the tabloid *The Globe* unless Mr. Cosby paid her \$40 million, Mr. Schmitt agreed to wear a recording device as part of a law enforcement operation that charged her with extortion.

And after Ms. Jackson was found guilty, Mr. Schmitt took the unusual step of appearing on Geraldo Rivera's CNBC show, "Rivera Live," in 1997, and saying that Mr. Cosby would take a blood test to determine paternity.

Mr. Schmitt declined to comment for this article.

The Cosby team's media strategy over the years has been a mix of hardball and playing ball, sometimes even with the same news organization.

Though the Cosby legal team threatened *The National Enquirer* in 2000 with a \$250 million lawsuit, relations with that tabloid were decidedly more friendly five years later. After Ms. Constand, the Temple University employee, had gone public with her accusations against Mr. Cosby, *The National Enquirer* was pursuing a story about another woman, Beth Ferrier, who said Mr. Cosby had drugged and sexually assaulted her in the mid-1980s. In exchange for not publishing its article about Ms. Ferrier, *The Enquirer* got an exclusive interview with Mr. Cosby (the headline: "Bill Cosby Ends His Silence: My Story!"), according to recently unsealed court documents.

Team Cosby would also try to apply pressure behind the scenes. In 1997,

soon after Mr. Cosby's son, Ennis, was murdered in Los Angeles, Mr. Cosby gave his first interview to Dan Rather of CBS News. For much of the two and a half hours of questioning, Mr. Rather focused on the crime and how Mr. Cosby was dealing with the grief. But he then gingerly asked about Ms. Jackson and the extortion charges, which had just become public days before. Mr. Cosby, surprisingly, acknowledged the affair with the mother and said that he could possibly be the father.

When the network aired the newsiest tidbits from Mr. Rather's forthcoming "60 Minutes" segment on the morning and evening news programs, Norman Brokaw, Mr. Cosby's William Morris agent and one of the most powerful people in television at the time, called Leslie Moonves, then the president of CBS Entertainment, to complain about the treatment of the network's star.

Days later — after Mr. Rather had recorded his audio for "60 Minutes" — CBS News decided to scrap the segment. CBS executives denied any corporate interference, saying journalistic reasons had prompted the move. In the biography "Cosby," Mark Whitaker writes that bad blood between Don Hewitt, the powerful executive producer of "60 Minutes," and Mr. Rather also drove the decision. Mr. Hewitt, who despised Mr. Rather, was furious that the newsiest excerpts had already been broadcast.

Mr. Moonves and Mr. Rather declined to comment.

During this recent spate of accusations, the Cosby team has suggested that the proliferation of accounts is itself a reason to distrust them and has pointed to apparent inconsistencies in some of the women's stories. It has also systematically directed its ire at the news media, which it claims is engaged in a blind rush to judgment against a man who has never been convicted or charged. Mr. Singer threatened to sue BuzzFeed last month as it prepared an article about accusations by Janice Dickinson, a onetime supermodel, that Mr. Cosby drugged and raped her in 1982 in Lake Tahoe in California. "You

proceed at your peril,” Mr. Singer wrote, saying that Ms. Dickinson had told a contradictory story in her memoir more than a decade earlier.

And in the past 10 days, he has sent angry letters to CNN and The Daily News, accusing them of abandoning any journalistic rigor in their coverage. “The media has consistently refused to look into or publish information about various women whose stories are contradicted by their own conduct or statement,” he wrote in his letter to The Daily News.

Mr. Singer isn’t the only one following the blame-the-media handbook. On Dec. 15, Mr. Cosby’s wife, Camille, finally broke her silence and joined the defense of her husband. In a statement released by David Brokaw, she said, “There appears to be no vetting of my husband’s accusers before stories are published or aired.”

She concluded: “None of us will ever want to be in the position of attacking the victim. But the question should be asked — who is the victim?”

But casting doubt on or aiming vitriol at the accusers can have consequences.

In 2005, when Mr. Cosby’s team denied Tamara Green’s accusations that he had drugged and sexually assaulted her in Los Angeles in the early 1970s, she did not pursue legal action. But this month she was ready to fight back. Mr. Cosby’s team had greeted her renewed claim of sexual assault by saying it was “a 10-year discredited accusation that proved to be nothing at the time, and is still nothing.” On Dec. 10, Ms. Green filed a defamation suit against Mr. Cosby, saying the denials basically branded her a liar.

“I want it put to a jury,” Ms. Green said earlier this month. “I want it ended, finally. I want my name restored.”

Colin Moynihan contributed reporting.

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EXHIBIT 14

HOLLYWOOD

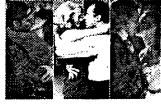
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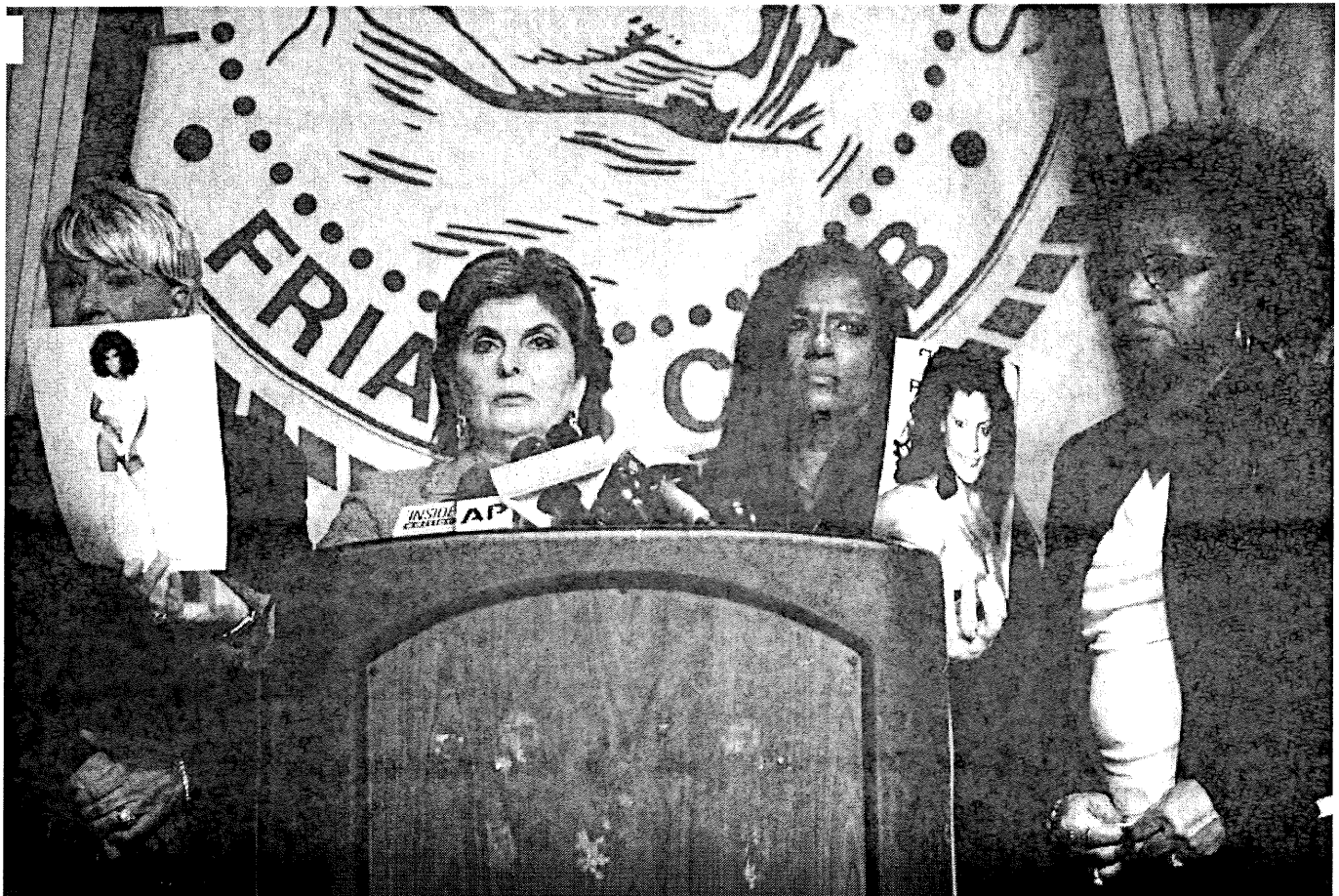
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AUGUST 20, 2015 7:39 PM

New Bill Cosby Accusers Mean over 50 Women Have Now Accused Comedian of Sexual Assault



By Rob Kim/Getty Images.

Two new Bill Cosby accusers came forward in a press conference on Thursday.

Last week, three women stepped forward to accuse **Bill Cosby** of sexual assault, bringing the comedian's accuser count to 49. And on Thursday, two additional women held a press conference in New York City to detail new allegations against the former family-sitcom star.

Sitting alongside civil-rights attorney **Gloria Allred**, **Charlotte Fox** and a woman identified as "Elizabeth" tearfully described their alleged encounters with Cosby, which took place in the 1970s.

USA Today reports that Fox said she met Cosby when she was a 23-year-old extra while on the set of a movie. Per the report, "She said he raped her in a room at the Playboy Mansion after she ate and drank food at a dinner he hosted."

Fox described what allegedly happened in the room, per *People*:

"I vaguely remember coming back from the bathroom," Fox read in a statement. "The next thing I remember was that I was sort of awake, in a bed, with no clothes on and there was Mr. Cosby, in a robe, crawling from the bottom of the bed."

Fox added, "I was incapacitated and couldn't say no. He engaged in sexual activity with me. It was not consensual."

USA Today reports the alleged events described by "Elizabeth:"

Elizabeth (she did not disclose her real name), said she was an American Airlines flight attendant, 20 years old, in 1976, when she met Cosby on a flight and he invited her to the Mansion. After she later drank sake at a Japanese restaurant with him, she says she fell into a trance-like state, ended up in his hotel room, and was forced to submit to a sex act she would not detail.

"All I know is that it was the most horrifying thing that could happen to an innocent young woman," she said. "No one would have ever believed me in 1976. I would have been told that put myself in a vulnerable situation and it was my fault."

Although statutes of limitations prevent the latest accusers from taking legal action against Cosby, Allred told reporters that Fox and "Elizabeth" "decided to come forward in an effort to help other women and to hold Mr. Cosby accountable for what they allege was his misconduct with them."

Since today's press conference, over 50 women have now come forward to accuse Cosby of drugging and/or sexually assaulting them.

Related: Bill Cosby Drugged Me. This Is My Story.

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EXHIBIT 15



Cosby jokingly warns woman about drinking around him during show

Published January 09, 2015

| Associated Press

LONDON, Ontario – Bill Cosby jokingly warned a woman in the audience during a show in Canada Thursday night to be careful drinking around him.

Cosby made the remark at his second performance in a row after a string of cancellations that followed sexual assault allegations from more than 15 women. Some of the women accused Cosby of drugging them by slipping something in their drinks before he assaulted them

A woman who got up from one of the front rows and walked past the stage was asked by Cosby where she was going. When she answered that she was going to the lobby to grab a drink Cosby responded: "You have to be careful about drinking around me." The remark was met with loud applause.

A few minutes later a heckler yelled at Cosby that he was a rapist.

Cosby stood up as the crowd started to boo the man and asked them not to respond. "No, no, stop," he said, waving his hands.

The man was removed from the theater by a police officer while one member of the audience yelled "we love you" to Cosby.

Cosby later addressed the disruption — the first at a show since the allegations surfaced — in a statement.

"Dear Fans: One outburst but over 2,600 loyal, patient and courageous fans enjoyed the most wonderful medicine that exist for human-kind. Laughter. I thank you, the theatre staff (Budweiser Gardens), the event organizers and the London, ON Community for your continued honor and support. I'm Far From Finished," Cosby said in the statement issued by his publicist following the show.

Cosby, 77, is also scheduled to appear at the Hamilton Place Theatre in Hamilton on Friday and in a number of shows throughout the U.S. over the next few months, including two shows in Denver on Jan. 17.

The comedian, who starred as Dr. Cliff Huxtable on "The Cosby Show" from 1984 to 1992, earning a reputation as "America's Dad," has never been charged in connection with any of the sexual assault allegations. A 2005 lawsuit by a Pennsylvania woman was settled before it went to trial, and he is

being sued by a woman who claims he molested her in 1974 and by three other women who allege they were defamed by the comedian when his representatives denied some of the allegations.



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