Lisa Bloom, Esq. (SBN 158458)
Alan Goldstein, Esq. (SBN 296430)
THE BLOOM FIRM
20700 Ventura Blvd., Suite 301
Woodland Hills, CA 91364
Telephone: (818) 914-7314
Facsimile: (866) 852-5666
Email: Lisa@TheBloomFirm.com
       Avi@TheBloomFirm.com

Attorneys for Plaintiff JANICE DICKINSON

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

| | |
|---|---|
| JANICE DICKINSON, an individual,<br><br>        Plaintiff,<br><br>    v.<br><br>WILLIAM H. COSBY, JR., an individual;<br>DOES 1 through 100, inclusive,<br><br>        Defendants. | CASE NO.: BC 580909<br><br>[Hon. Debre Weintraub – Dept. 47]<br><br>**PLAINTIFF JANICE DICKINSON'S EVIDENCE OBJECTIONS AND MOTION TO STRIKE RE DEFENDANT'S SPECIAL MOTION TO STRIKE (ANTI-SLAPP MOTION)**<br><br>Date: February 29, 2016<br>TIME: 8:30 A.M.<br><br>Complaint filed: May 20, 2015 |

Plaintiff JANICE DICKINSON hereby objects to and moves to strike the following

evidence introduced by Defendant William H. Cosby, Jr. in connection with his Special Motion

to Strike (anti-SLAPP) motion:

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PLAINTIFF'S EVIDENCE OBJECTIONS
& MOT. TO STRIKE RE DEF'S
ANTI-SLAPP MOTION     -1-

*Janice Dickinson v. William H. Cosby, Jr.*
CASE NO.: BC 580909

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### I. Objections to and Motion to Strike Declaration of Martin Singer

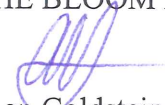| Material Objected to: | Grounds for Objection: |
|---|---|
| 1. Singer Decl. ¶ 5, at 1:27-2: 4 - "It quoted Ms. Dickinson as saying . . . Mr. Cosby and his legal team demanded that the publisher remove the passage." | Hearsay (Evid. Code § 1200); lack of personal knowledge (Evid. Code § 702 (a)). |
| 2. Singer Decl. ¶ 8, at 2:25 - "Autobiography." | Insufficient Foundation (Evid. Code §§ 403, 405). |
| 3. Singer Decl. ¶ 9, at 3:9-10 - "Ms. Dickinson confirmed . . . she declined his invitation to his hotel suite. She told . . . 'Oh, he's so sad.'" | Hearsay (Evid. Code § 1200); lack of personal knowledge (Evid. Code § 702 (a)). |
| 4. Singer Decl. ¶ 14, at 4:17 - "Autobiography." | Insufficient Foundation (Evid. Code §§ 403, 405). |
| 5. Singer Decl. ¶ 15, at 4:18-24 – "At the time I issued the November 18 and 19 statements . . . for pecuniary gain several years ago. Due to that experience . . . other information about Ms. Dickinson in the media." | Insufficient Foundation (Evid. Code §§ 403, 405); hearsay (Evid. Code § 1200); lack of personal knowledge (Evid. Code § 702 (a)); improper impeachment (Evid. Code §§ 352, 780. 785, 789, 1101-03); inadmissible character evidence (Evid. Code §1101(a)). |

PLAINTIFF'S EVIDENCE OBJECTIONS
& MOT. TO STRIKE RE DEF'S
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| Material Objected to: | Grounds for Objection: |
|---|---|
| 6. Singer Decl. ¶ 16, at 4:6:5 – "Before issuing the November 18 demand letter . . . Ms. Dickins had a reputation as a wild and unreliable person. Prior to those statements. . . and prone to loss of memory and a liar." | Insufficient Foundation (Evid. Code §§ 403, 405); hearsay (Evid. Code § 1200); lack of personal knowledge (Evid. Code § 702 (a)). |
| 7. Singer Decl. ¶ 16, at 5:6-6:12 – Exhibits H, I, J, K, L | Insufficient Foundation (Evid. Code §§ 403, 405); hearsay (Evid. Code § 1200); lack of personal knowledge (Evid. Code § 702 (a)). |
| 8. Singer Decl. ¶ 19, at 6:21:7:2 – "As a consequence of my own personal experience dealing with Ms. Dickinson . . . I believed those statements to be accurate. I had no reason to believe . . . that Ms. Dickinson fabricated her current story about Mr. Cosby were false." | Insufficient Foundation (Evid. Code §§ 403, 405). |

## II.     Objections to and Motion to Strike Declaration of John P. Schmitt

| Material Objected to: | Grounds for Objection: |
|---|---|
| 1. Schmitt Decl. ¶ 3, at 2:10-15 – "On November 18, 2014 . . . Lake Tahoe, CA in 1982. Ms. Dickinson also said . . . Mr. Cosby and his lawyers, pressured her and the publisher to remover the details. | Hearsay (Evid. Code § 1200). |

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Dated: February 16, 2016

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3                                               Respectfully submitted,
                                              THE BLOOM FIRM
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                                              Alan Goldstein
6                                             Attorneys for Plaintiff
                                              Janice Dickinson
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PLAINTIFF'S EVIDENCE OBJECTIONS          *Janice Dickinson v. William H. Cosby, Jr.*
& MOT. TO STRIKE RE DEF'S                    CASE NO.: BC 580909
ANTI-SLAPP MOTION          -4-

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*JANICE DICKINSON v. WILLIAM H. COSBY, JR.*
LASC No: BC 580909

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 20700 Ventura Blvd., Suite 301, Woodland Hills, CA 91364.

On February 16, 2016, I served the following document(s) described as: PLAINTIFF JANICE DICKINSON'S EVIDENCE OBJECTIONS AND MOTION TO STRIKE RE DEFENDANT'S SPECIAL MOTION TO STRIKE (ANTI-SLAPP MOTION) and PROPOSED ORDER on the interested parties in this action by read-receipt email and by placing a true and correct copy in an enclosed sealed envelope as follows:

Christopher Tayback, Esq. (ChrisTayback@quinnemanuel.com)
Randa A.F. Osman, Esq. (RandaOsman@QuinnEmanuel.com)
Justin C. Griffin, Esq. (JustinGriffin@QuinnEmanuel.com)
QUINN EMANUEL URQUHART & SULLIVAN, LLP
865 South Figueroa Street, 10th Floor
Los Angeles, California 90017-2543
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

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

[ X ] **ELECTRONIC MAIL**

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

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

Executed on February 16, 2016 at Los Angeles, California.


 Steve Conlon                                                          _____
(Print or Type Name)                                          (Signature of Declarant)

PLAINTIFF'S EVIDENCE OBJECTIONS
& MOT. TO STRIKE RE DEF'S
ANTI-SLAPP MOTION     -5-

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