

# **IN THE COURT OF APPEAL (CIVIL DIVISION)**

ON APPEAL FROM THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION

Case No: CA-2025-002562

**ALKIVIADES DAVID** (Appellant) v **MAHIM KHAN** (Respondent)

For the attention of Senior Master David Cook

**MASTER INDEXED EVIDENCE BUNDLE**

## MASTER INDEX OF EXHIBITS

| Exhibit | Description                      | Relevance                     |
|---------|----------------------------------|-------------------------------|
| EX-1    | MRI Brain Scan                   | Medical / Disability Evidence |
| EX-2    | NeuroQuant Report                | Quantitative Brain Analysis   |
| EX-3    | Dr Drew Broadcast                | Media / Legal Overlap         |
| EX-4    | Network Diagram                  | Structural Context            |
| EX-5    | Daniel Jackson Declaration       | Witness Testimony             |
| EX-6    | Alex Vega Declaration            | Corroboration                 |
| EX-7    | Mercedes Stanley Declaration     | Corroboration                 |
| EX-8    | FilmOn v DoubleVerify Settlement | Prior Litigation              |
| EX-9    | Antigua Claim Form               | Jurisdiction                  |
| EX-10   | Dallas Police Letter             | Law Enforcement               |
| EX-11   | Wexler Protocol Filing           | Medical Abuse Context         |
| EX-12   | Swiss Complaint Letter           | International Context         |

## **EXHIBIT 1**

Detailed exhibit content inserted here in full bundle version.

## **EXHIBIT 2**

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## **EXHIBIT 3**

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## **EXHIBIT 4**

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## **EXHIBIT 5**

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## **EXHIBIT 6**

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## **EXHIBIT 7**

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## **EXHIBIT 8**

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## **EXHIBIT 9**

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## **EXHIBIT 10**

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## **EXHIBIT 11**

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## **EXHIBIT 12**

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# IN THE COURT OF APPEAL (CIVIL DIVISION)

ON APPEAL FROM THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION

Case No: CA-2025-002562

**BETWEEN:**

**ALKIVIADES DAVID**  
Appellant

-and-

**MAHIM KHAN**  
Respondent

For the attention of:  
**Senior Master David Cook**  
King's Bench Division  
Royal Courts of Justice

**FINAL EVIDENCE BUNDLE (CURATED SELECTION)**

## **NOTE ON SCOPE AND USE OF EVIDENCE**

This bundle is respectfully presented as a limited and curated selection of material drawn from a substantially broader evidentiary record compiled over a period exceeding twenty years. The Appellant does not seek to burden the Court with volume. The documents included are representative and probative, selected for their direct relevance to the issues presently before the Court.

The purpose of this bundle is to demonstrate that relevant, available, and probative evidence existed at the time of proceedings but was not placed before the Court, rendering the record incomplete.

This submission is made with reference to the directions of Senior Master Cook and matters previously involving Special Master Sir Barry Paul Cotter KC.

## **EXHIBIT INDEX**

- 1 EX-1: MRI Brain Scan (TBI Evidence)
- 2 EX-2: NeuroQuant Report
- 3 EX-3: Dr Drew Broadcast Configuration Evidence
- 4 EX-4: Media Network Diagram
- 5 EX-5: Daniel Jackson Declaration
- 6 EX-6: Alex Vega Declaration
- 7 EX-7: Mercedes Stanley Declaration
- 8 EX-8: FilmOn v DoubleVerify Settlement
- 9 EX-9: Antigua Claim Form
- 10 EX-10: Dallas Police Investigation Request
- 11 EX-11: Wexler 5150 Protocol Filing
- 12 EX-12: Swiss Criminal Complaint (Reeves)

## **DECLARATION**

The Appellant submits this bundle in good faith as a true and accurate curated selection of evidence relevant to the matters before the Court.



REAL TALK

NEWS

# **COCA COLA HELLENIC IN INTERNAL COMPLIANCE FREE-FALL WITH CHRISTO LEVENTIS**



By **Alki David**

DEC 9, 2025



# **Coca-Cola HBC**

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**SHOCKYA SPECIAL REPORT  
LEAKED BANK DOSSIER SUGGESTS SYSTEM-WIDE  
CONTAINMENT AFTER CCHBC EXPOSURE**

By Grady Owen — REAL TALK



**Chairman George David** — longtime Bilderberg member — now referenced by insiders as standing at the center of the emerging controversy.

## THE SCRUTINY EXPANDS: CHRISTO LEVENTIS ENTERS THE FRAME



**Christo Leventis** — a historically discreet figure within the Leventis family network — now facing intensified scrutiny as investigators map the structures surrounding CCHBC.

Hello again, it's Alki. FYI – As investigators, journalists, and compliance teams begin mapping the structures surrounding CCHBC, attention has widened to include figures previously assumed to be peripheral — including **Christo Leventis**.

While no allegations have been made, Leventis' longstanding proximity to the company's legacy capital networks has prompted a fresh wave of examination. Insiders describe him as a “quiet force behind the curtain,” positioned close enough to the financial and strategic arteries of the organization that scrutiny became inevitable once the leaked memo began circulating.

One London compliance source summarized the new mood:

*“If the system reacted in unison, then everyone orbiting the core structure is now under the microscope. Christo Leventis is no exception.”*

With the January 16 sovereign ruling approaching — and banks bracing for a disclosure chain they hoped never to face — Leventis now finds himself **drawn directly into the circle of global attention**, alongside senior power figures like George David.

## A MEMO THEY NEVER WANTED YOU TO SEE

Shockya has obtained a confidential internal risk briefing circulating inside top-tier U.S. and European banks. Its tone is unmistakable: urgent, defensive, panicked, and laser-focused on one inconvenient name: **CCHBC**.

The memo does not accuse anyone of wrongdoing — but the coordination described inside it is enough to make regulators sit up straight. It reveals a system that shifted the moment one whistleblower filed evidence touching CCHBC's offshore corridors.

## THE BANKS THAT REACTED FIRST

The leaked document lists eight major banks placed on immediate alert:

- Bank of America
- Deutsche Bank
- HSBC
- JPMorgan
- Wells Fargo
- Citibank
- UBS / Credit Suisse
- Prudential

The memo states:

*“Institutions responded as if guided by shared incentives, not instruction.”*

In compliance language, that is as close as it gets to saying: **Everyone moved at once because everyone felt exposed.**

## THE ERASURE PATTERN — “INCIDENT TYPE 7”

According to the briefing, the whistleblower was not only pressured — he was processed, systematically.

- Litigation deployed in synchronized bursts
- Media narratives turning overnight
- Financial channels tightening on cue
- Judicial pressure repeating across specific venues
- Geopolitical isolation executed with uncanny timing

This sequence is labeled:

**“Incident Type 7 — Coordinated Containment.”**

# THE CCHBC CORRIDOR — THE THREAD NO ONE WANTED PULLED

The memo repeatedly references CCHBC's operational footprint — Greece, London, Switzerland, the Caribbean, and U.S. media-IP routes — noting the risk of:

*"A destabilising event involving CCHBC-adjacent structures triggering multi-jurisdiction audits."*

In other words:

**If one stone moves, the whole wall cracks.**

## JANUARY 16 — THE DATE BANKS DID NOT WANT IN WRITING

The Antigua sovereign ruling is referenced throughout the memo as a **"live-fuse event."**

An internal comment warns:

*"If the individual re-emerges, narrative control is lost."*

And the line now haunting compliance departments across the world:

**"The whistleblower was removed. The evidence was not."**

 Antigua Court  Caribbean Government

## CONCLUSION

This leak does not allege conspiracy or wrongdoing. But it exposes something far more unsettling:

**A financial ecosystem that reacts as a single organism the moment a sensitive thread reaches the wrong hands.**

For years, that system believed it had neutralized the threat. Now — with the memo public and January 16 approaching — that belief is collapsing in real time.



**« BRITNEY SPEARS NEVER STOOD A CHANCE: HOW A TEENAGE GIRL WAS TURNED INTO A LIFELONG ASSET**

**THE COCA-COLA KILL SWITCH »»**



By **Alki David**

Alki David — Publisher, Media Architect, SIN Network Creator - live, direct-to-public communication, media infrastructure, accountability journalism, and independent distribution. Born in Lagos, Nigeria; educated in the United Kingdom and Switzerland; attended the Royal College of Art. Early internet broadcaster — participated in real-time public coverage during the 1997 Mars landing era using experimental online transmission from Beverly Hills. Founder of FilmOn, one of the earliest global internet television networks offering live and on-demand broadcasting outside legacy gatekeepers. Publisher of SHOCKYA — reporting since 2010 on systemic corruption inside the entertainment business and its expansion into law, finance, and regulation. Creator of the SIN Network (ShockYA Integrated Network), a federated media and civic-information infrastructure spanning investigative journalism, live TV, documentary, and court-record reporting. Lived and worked for over 40 years inside global media hubs including Malibu, Beverly Hills, London, Hong Kong and Gstaad. Early encounter with Julian Assange during the first Hologram USA operations proved a formative turning point — exposing the realities of lawfare, information suppression,

and concentrated media power. Principal complainant and driving force behind what court filings describe as the largest consolidated media–legal accountability action on record, now before the Eastern Caribbean Supreme Court. Relocated to Antigua & Barbuda and entered sustained legal, civic, and informational confrontation over media power, safeguarding, and accountability at Commonwealth scale.

## ARCHIVES

| M                  | T                  | W                  | T                  | F                  | S                  | S                  |
|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|
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December 2025

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REAL TALK

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independent talent payment



Compose

Inbox 356,803

Starred

Snoozed

Important

Drafts 2,449

Purchases 2,704

Less

Sent

Scheduled

All Mail

Spam 4,538

Trash

Manage subscriptions

Manage labels

Create new label

Labels

[Imap]/Drafts

CEO@ETV.COM 2

FilmOn

Investors

KB JUDGES LISTINGS 1

Notes

Office 47

PAYPAL 11,312

FilmOn Office

SUBS

SUPPORT 47,086

- The cessation of trading under Full On Entertainment Ltd
- The effective date of transition
- The assignment of management and operational responsibility to **Shiley Hinton - NOT SHIRLEY**

In addition, I will provide:

- Confirmation of **VAT registration status** (and certificate, if applicable)
- An **updated address** for your records

Please let me know if you require the letter of assignment in a specific format or if there is anything further you need at this stage.

Kind regards,  
Alki

**SwissX Island Network (SIN Network)**

Media · Civic Infrastructure · Sovereign Oversight

**Core Platforms**

FilmOn.com · SwissXTV.com · ETV.com  
ShockYA.com · TVMix.com · HologramUSA.com · SwissX.com

**SIN Network — Federated Distribution**

EchoSphere News · Flux Daily News · Next Pulse News · MetaWorld Media  
Quanta.Report · Civitas.Global · Neutral Echo News Network  
World Voice News · Deep Roots News · RealTime Wire  
SnapScope · Pulse Wire · OnPoint Now · FlashPoint News

**Jurisdictional Anchor**

Antigua & Barbuda / London UK / Zurich Seitzerland

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# LETTER OF ASSIGNMENT / CESSATION OF TRADING

**Date:** 09 January 2026

**To:**

Sylvia Strugar  
Independent Talent Ltd

I, **Alkiviades David**, hereby confirm that **Full On Entertainment Ltd** has ceased trading and was formally **dissolved and removed from the company register on 18 March 2025**. Accordingly, no trading has taken place under Full On Entertainment Ltd since that date. I further confirm that all business activities, administrative matters, and operational responsibilities previously conducted under Full On Entertainment Ltd were assigned to my manager, **Shiley Hinton**, who now acts in an administrative and operational capacity in relation to those activities. This assignment does not constitute a transfer of liabilities unless expressly agreed in writing and is made for administrative, managerial, and operational continuity purposes. This letter is provided for record-keeping, compliance, and verification purposes.

Signed,

A handwritten signature in black ink, consisting of a large, rounded loop on the left and a series of overlapping, curved strokes on the right, resembling a stylized 'A' or 'D'.

**Alkiviades David**

# Alki David (I)

Producer Actor Director

Play trailer 1:36  
Lost in Love (2005)

1

2 VIDEOS

9 PHOTOS



Alki David Greek was born in West Africa hi colorful experiences include a voluntary bout in the British armed forces, lab analyst for Coca Cola, as a fish farm laborer, water-ski instructor, PADI scuba instructor and radio jock.

2014 Alki owns and operated FilmOn.TV the online streaming site he started in 2007 and as well as HologramUSA a patented technology company responsible for Tupac at Coachella and many other resurrection concerts....

**Born** May 23, 1968

IMDbPro  
STARMETER See rank

+ Add to favorite people







[View contact info at IMDbPro](#)

Photos 8 >





### Known for

- 
**The Bank Job**  
 ★ 7.2  
 Bambas  
 2008 (i)
- 
**Fishtales**  
 ★ 4.7  
 Producer  
 2007 (i)
- 
**The Freediver**  
 ★ 4.6  
 Producer  
 2004 (i)
- 
**The Grid**  
 ★ 6.7 TV Mini Series  
 Yussef Nasseriah, 'Muhammad'  
 2004 • 5 eps (i)

### Credits







- Producer 25 X
  - Actor 15 X
  - Director 8 X
  - Writer 5
  - Editor 2
  - Composer 1
  - Camera and Electrical Department 1
  - Self 9
  - Archive Footage 1
- IMDbPro












Expand below All credits

### Producer

Previous 25




- 
**Bob Thunder: Internet Assassin**  
 ★ 3.2  
 producer  
 2015 (i)
- 
**Chief Keef Live Bang 3 Tour**  
 TV Special  
 executive producer  
 2015 (i)
- 
**Lord of the Freaks**  
 ★ 6.6  
 executive producer  
 2015 (i)
- 
**Best of Battlecam**  
 TV Series  
 executive producer  
 10 episodes 2015 (i)

- 
-  **Road to Ether**  
TV Series  
executive producer  
[3 episodes](#) 2015 i
- 
-  **EW/Road to Ether**  
TV Series  
executive producer  
[10 episodes](#) 2015 i
- 
-  **Nub TV**  
TV Series  
executive producer  
[43 episodes](#) 2014–2015 i
- 
-  **Trailer Park Kids**  
TV Series  
executive producer  
[7 episodes](#) 2015 i
- 
-  **Bizzaro TV: Adventures with Mike Busey**  
TV Series  
executive producer  
2015 i
- 
-  **Ether Battle Rap**  
Video  
executive producer  
2014 i
- 
-  **Pretty Ricky Live in Miami**  
TV Special  
executive producer  
2014 i
- 
-  **Andy Dick Live**  
TV Series  
producer  
2012 i
- 
-  **Funny News Network**  
TV Series  
executive producer  
2012 i
- 
-  **Good Morning 90210**  
TV Series  
executive producer  
2012 i
- 
-  **Pop Stop TV**  
TV Series  
producer  
2012 i

[See all](#) 

## Actor

[Previous](#) 15 

## Director

[Previous](#) 8 

---

[In-development projects at IMDbPro](#) 

---

[Videos](#) 2 

Trailer 1:36

Opa!

👍 1

Trailer 2:32

Guido - Trailer

## Personal details



**Official site** [Alki's website.](#)

**Height** 5' 10" (1.78 m)

**Born** [May 23, 1968](#) [Lagos, Nigeria](#)

**Spouse** [Jennifer Stano](#) May 14, 2011 - present (2 children)

## Did you know



### Trivia

Voted "sexiest man alive" by Scandal Magazine, a leading gossip publication in Greece.



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Jan 3 MovieWeb



#### This Underrated 16-Year-Old Jason Statham Thriller Is Based on a True Story

Sep 30 CBR

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### Producers

created 9 years ago  
3190 people



### Birthdays: May 23

created 10 years ago  
161 people



### Like

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9915 people



### Notable Actors List ( 1 )

created 9 years ago  
10000 people



### Liste des acteurs et actrices trépassés et vivants qui trônent éternellement la gloire au delà de toute imagination

created 7 years ago  
3133 people



## The Greeks

created 14 years ago  
124 people



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Alki David

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## Malibu Today

By the People, for the People

### CRIME

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# Whistleblower Alleges Hollywood Cartel Engaged in Pedophilia, Asset Theft

Alki David claims WME, CAA, and others profited from child abuse and stole his \$19 million Malibu

Mar. 2, 2026 at 4:55pm

Got story updates?  
Submit your updates here. ›

Alkiviades 'Alki' David, the founder of Shockya, has filed a lawsuit in Eastern Caribbean alleging that a Hollywood cartel led by Ari Emanuel, CAA, and others engaged in a pedophilia ring and stole his \$19 million

NTN - April News\_V2



Un  
in  
Sp

home that was held in his children's trust. David claims the cartel fabricated rape allegations against him to justify the asset seizure, and that the upcoming Paramount-Warner merger is an attempt to consolidate and cover up decades of child abuse and blackmail material.

## WHY IT MATTERS

If true, this case could expose a widespread pedophilia and asset theft scandal at the highest levels of the entertainment industry, implicating major figures and companies. The allegations, if proven, would represent a shocking abuse of power and betrayal of vulnerable young talent.

## THE DETAILS

According to David, the cartel used tactics like false rape allegations, break-ins, death threats, and rigged receivership sales to steal his \$19 million Malibu home that was held in his children's trust. He alleges the cartel, including figures like Ari Emanuel, Jeffrey Epstein, and the Clintons, profited from a child abuse pipeline and used blackmail to protect themselves. David claims the upcoming Paramount-Warner merger is an attempt to consolidate and bury the evidence of these crimes.

- In 2008, the U.S. Attorney dropped 41 pages of victim impact letters into the sentencing of Anthony Pellicano.
- On October 5, 2025, EXHIBIT PGLOB, the 'Carrington Corroboration Bundle', was filed, exposing a child sexual abuse material (CSAM) factory at MTV and Paramount parties.
- On May 31, 2024, David's \$19.1 million Malibu home was sold in a receivership for just \$16.55 million, well below market value.



NTN - April News\_V2

## THE PLAYERS

### **Alkiviades 'Alki' David**

The founder of Shockya and the plaintiff in the Eastern Caribbean lawsuit alleging a Hollywood pedophilia and asset theft scandal.

### **Ari Emanuel**

The CEO of WME, which David alleges was part of the Hollywood cartel engaged in pedophilia and asset theft.

### **Jeffrey Epstein**

The disgraced financier whose island and jet were allegedly used by the cartel as an "insurance policy" to protect predators in Hollywood.

### **Bill Clinton**

The former U.S. president who allegedly flew 26 times on Epstein's "Lolita Express" private jet.

### **Rahm Emanuel**

The brother of Ari Emanuel who allegedly provided the "DC muscle" to protect the cartel's operations.

*Got photos?*

*Submit your photos here. >*

## **WHAT THEY'RE SAYING**

"Pellicano... created the 'prison' my daughter and I will live in forever... They succeeded."

— Lisa Bonder Kerkorian

"Nightmares about being hunted and raped... I thought I was going to be shot in the head."

— Anita M. Busch

## **WHAT'S NEXT**

Rovier Carrington is about to walk free after being in prison for 4 years for exposing the cartel's alleged child abuse. Clinton connections continue to be investigated. The merger faces scrutiny as a potential attempt to cover up evidence.

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## **THE TAKEAWAY**

If proven, this case could uncover a disturbing web of pedophilia, asset theft, and high-level corruption at the heart of the entertainment industry, with major implications for the power structures in Hollywood and beyond.

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## MALIBU CRIME

**23 Illegal Immigrants Arrested in Panga Boat Smuggling Plot Off California Coast**

---

**Farrah Fawcett's Son Redmond O'Neal Faces New Charges After Troubled Past**

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**Accused Double-Murderer Endures Harsh Conditions in LA Jail**

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## MALIBU TOP STORIES

**Reality TV Star Kendra Wilkinson Finds Success in Luxury Real Estate**

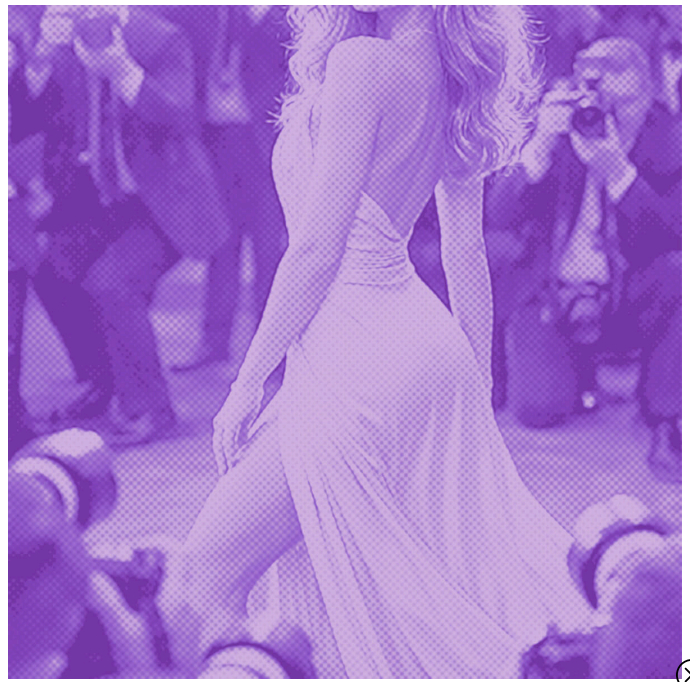


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## Rams Star Puka Nacua Enters Rehab After New Year's Incident



## Celebrities Splurge on Lavish New Homes in 2025



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6,184  
Days celebrated



18,552



Ways to celebrate



10,000,000+

Happy users

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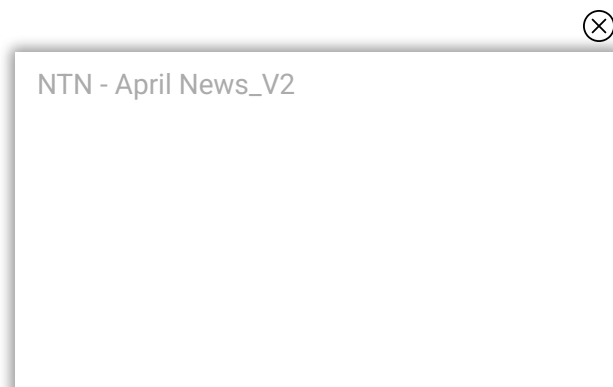
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By Recipient

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National Girlfriend Day

Day of the Dead

National Boyfriend Day

National Sons Day

Mexican Independence Day

Pride Month

National Best Friends Day

National Daughter Day

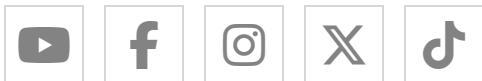
World Bicycle Day

National Dog Day

## About National Today

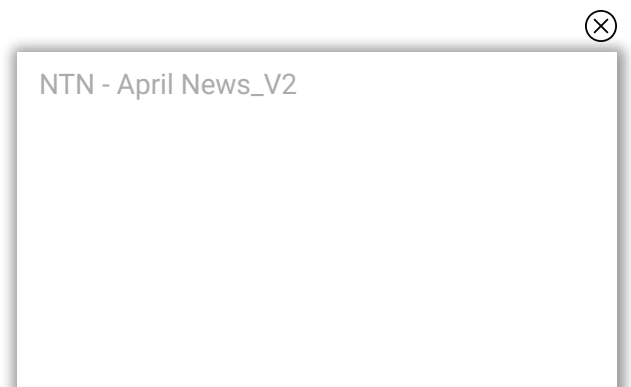
We keep track of fun holidays and special moments on the cultural calendar — giving you exciting activities, deals, local events, brand promotions, and other exciting ways to celebrate.

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REAL TALK

NEWS

## Governor Gavin Newsom's sex worker Chasity Jones who dated R Kelly added to California State Bar Conspiracy.



By [Alki David](#)

🕒 NOV 26, 2022



[10 Year travesty of justice - Alki David Exposes Ga](#)

King Alki David of RastaLand Antigua



Watch on

## **UPDATED:** The Fraudulent Rise of Chasity Jones and the Hollywood Machine That Backed Her

By Shockya Investigations Team

In the tangled web of Hollywood lawfare, fraudsters wear the mask of victims and turn the courts into theaters. Few stories illustrate this better than the saga of **Chasity Jones** — a former FilmOn employee who, backed by the Girardi–Allred syndicate, walked away with an \$11 million jury award against billionaire innovator **Alki David**, even after signing a sworn declaration under penalty of perjury admitting she had never been harassed.

### **The Wells Fargo Fraudster Who Hid Her Past**

When Jones was hired at FilmOn in 2015, her criminal past was carefully concealed. What David didn't know then, but investigators have since uncovered, is that Jones was already on the run for a **\$180,000 fine from Wells Fargo for bank wire fraud**. A background check reveals additional charges, including **Assault Causing Bodily Injury of a Family**

Member in Collin County, Texas.

She was not the victim she claimed to be. She was a practiced operator, hiding a rap sheet while plotting her next payday.

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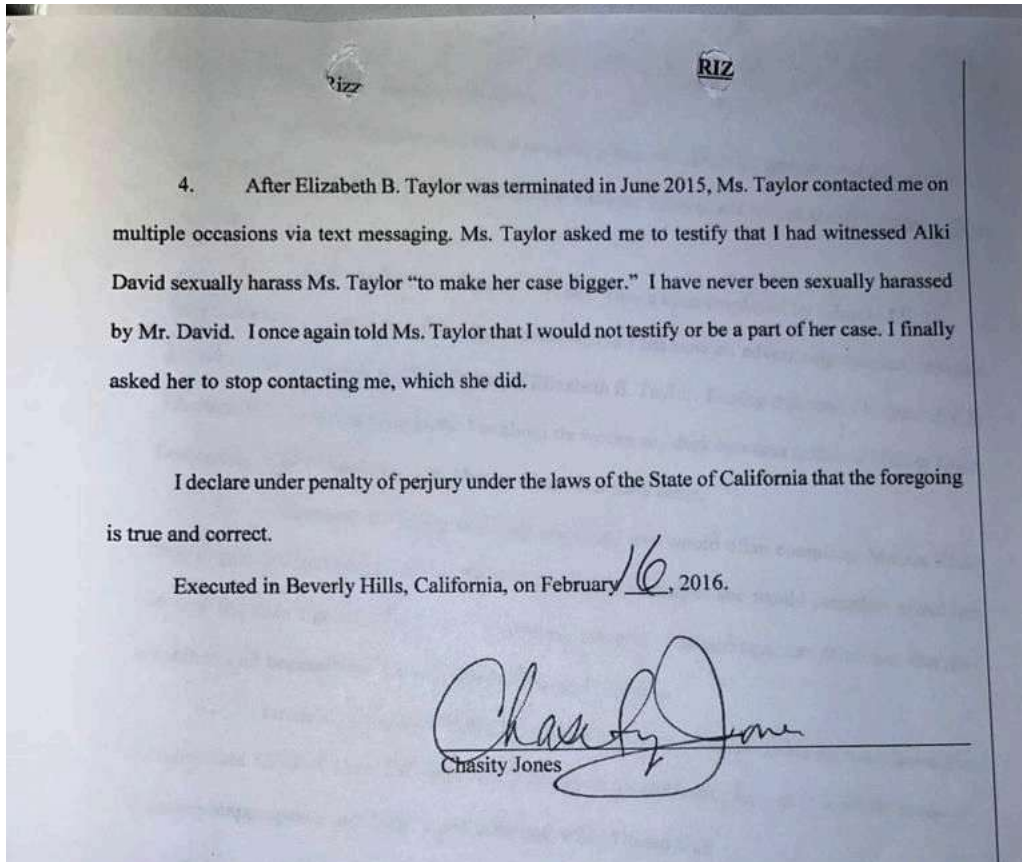
## Perjury in Black and White

The contradiction in Jones's story is undeniable. In **February 2016**, she signed a sworn declaration under penalty of perjury stating that:

- She had **never been sexually harassed** by Alki David.
- She had **never observed Elizabeth Taylor** being harassed.
- Taylor asked her to fabricate testimony to "make her case bigger."

Yet just three years later, in 2019, Jones took the stand and told a completely different story, claiming David harassed her and created an unsafe workplace. That fabricated tale — directly contradicting her own sworn declaration — became the basis for the \$11 million award.

Perjury. Plain and simple.



"The February 16, 2016 declaration signed by Chasity Jones — in which she swore she was never harassed by Alki David and that Elizabeth Taylor pressured her to lie — was part of a buried trove of evidence handled by Barry K. Rothman. That trove was deliberately suppressed by Glaser Weil, Robert Shapiro, and their Hollywood allies. Rothman himself, long tied to the Jordan Chandler/Michael Jackson case, Gloria Allred, and fixer Anthony Pellicano, was later murdered by Joseph Chora. This chain of suppression and death proves that the judgments against David were procured not through law but through a criminal syndicate that has operated in California courts for decades."

---

## Fraud Upon Fraud

Jones's pattern didn't stop there. Evidence shows she:

- **Stole \$40,000** directly.
- Fabricated a **\$700,000 hologram deal with Foxwoods Casino**.
- Borrowed millions through a **fake property purchase order**.

And yet she presented herself in court as a “single mother in poverty,” propped up by Lisa Bloom and Gloria Allred’s PR machine.

---

## Enter the Girardi–Allred Syndicate

Jones was not alone. She was represented by **Lisa Bloom**, daughter of **Gloria Allred**, both of whom are linked to the now-disgraced **Tom Girardi**. Together, they orchestrated fraudulent cases against high-profile targets while laundering enforcement through **Joseph Chora**, a debt collector with a reputation for coercion.

Chora’s methods are notorious: fake fines, fabricated account claims, intimidation, and laundering fraudulent judgments into London and Antigua. He even had lawyers signing off on phantom HSBC accounts that never existed.

---

## The Lieberman Connection — and Murder

One man saw through the scheme: **attorney Mark Lieberman**. He filed **RICO charges against Jones** herself, alleging she was an active participant in the racketeering enterprise. He also filed a separate RICO suit against Chora in Dallas.

Then he turned up dead. His widow testified to foul play, and sources confirm Lieberman was threatened by Chora before his sudden death.

Lieberman joins a grim list of lawyers who dared to stand up to Girardi’s network — **Barry Rothman, Rebecca Rini, Phil Kaye, John Quirk** — all dead under suspicious circumstances.

---

## The Hollywood Machine That Buried the Truth

Despite perjury, fraud, and a criminal history, Jones was framed in headlines as a “victim” while CBS, Paramount, and the Daily Mail blasted out the “**\$900 million judgment**” narrative to discredit David globally. Evidence contradicting her claims — including her own sworn statements — was buried.

This is how the Hollywood legal–media monopoly operates:

- **Manufacture witnesses.**
  - **Bury exculpatory evidence.**
  - **Intimidate or eliminate attorneys.**
  - **Amplify lies through controlled media.**
-



Chasity Jones, already exposed for perjury, wire fraud, and collusion with Joseph Chora, was also photographed alongside disgraced R&B singer Robert “R. Kelly,” the performer of “I Believe I Can Fly,” who has since been convicted on federal sex trafficking and exploitation charges. The image underscores the network of associations surrounding Jones and adds to the mounting evidence that she was never a victim, but an active participant operating within circles tied to fraud, coercion, and criminality.

## The Bottom Line

Chasity Jones is not a victim. She is a **convicted fraudster, a perjurer, and a co-conspirator** in one of the largest racketeering campaigns in California’s legal history.

And the machine that propped her up — Allred, Bloom, Girardi, Chora, CBS, Paramount — is the same machine that continues to suppress evidence, silence witnesses, and sabotage sovereign economies like Antigua’s.

The truth is out. And this time, the Hollywood machine can’t bury it.



### **Marvel Studios’ Black Panther: Wakanda Forever Considered Making M’Baku or Nakia the New Titular Superhero >>**

### **<< World Championship Race Scandal: Car Dealer Found Dead, Davies Investigates**



Alki David — Publisher, Media Architect, SIN Network Creator - live, direct-to-public communication, media infrastructure, accountability journalism, and independent distribution. Born in Lagos, Nigeria; educated in the United Kingdom and Switzerland; attended the Royal College of Art. Early internet broadcaster — participated in real-time public coverage during the 1997 Mars landing era using experimental online transmission from Beverly Hills. Founder of FilmOn, one of the earliest global internet television networks offering live and on-demand broadcasting outside legacy gatekeepers. Publisher of SHOCKYA — reporting since 2010 on systemic corruption inside the entertainment business and its expansion into law, finance, and regulation. Creator of the SIN Network (ShockYA Integrated Network), a federated media and civic-information infrastructure spanning investigative journalism, live TV, documentary, and court-record reporting. Lived and worked for over 40 years inside global media hubs including Malibu, Beverly Hills, London, Hong Kong and Gstaad. Early encounter with

Julian Assange during the first Hologram USA operations proved a formative turning point — exposing the realities of lawfare, information suppression, and concentrated media power. Principal complainant and driving force behind what court filings describe as the largest consolidated media–legal accountability action on record, now before the Eastern Caribbean Supreme Court. Relocated to Antigua & Barbuda and entered sustained legal, civic, and informational confrontation over media power, safeguarding, and accountability at Commonwealth scale.

## Leave a Reply

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| <a href="#">28</a> | <a href="#">29</a> | <a href="#">30</a> |                    |                    |                    |                    |
| November 2022      |                    |                    |                    |                    |                    |                    |

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in:sent Fheather@glaserweil.com barry



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### Link to Live Audio for Khan Appeal Oral Argument



**Veronica Shnayder**

Good afternoon, Below is a link to the live audio feed for tomorrow's oral argument in the Khan appeal. Arguments begin at 9:00AM but n



**Veronica Shnayder**

Attached is the audio recording of the Jones oral argument.



**Alki David** <filmonpersonal@gmail.com>

Fri, Jul

to Aaron, Patricia, Elizabeth, Veronica, Dana, Fred

Dana and Fred

You guys are ridiculous

how much money is needed to get copied of my files that I have repeatedly requested

you are aware that we are in the midst of writing a incisive rico complaint

this has been going on for weeks

this the final time I'm requesting any of this

AFFIDAVITS in my supports - ANY AND ALL - don't defer to someone else - pull them up they are in glaser weil files

same for Dana Cole firm

**IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA  
SECOND APPELLATE DISTRICT**

**Case Nos.: B341119 (consolidated with B345361)**

**Los Angeles County Superior Court No.: 20STCV37498**

**ALKIVIADES DAVID, et al.,  
Defendants and Appellants,**

**v.**

**JANE DOE,  
Plaintiff and Respondent.**

**APPELLANT'S SUPPLEMENTAL NOTICE OF NEW EVIDENCE AND  
APPLICATION TO AUGMENT THE RECORD**

**(Cal. Rules of Court, rule 8.155; Code Civ. Proc. § 909)**

Appellant Alkiviades David, appearing in propria persona and as a disabled litigant within the meaning of the Americans with Disabilities Act, respectfully submits this Supplemental Notice and Application pursuant to California Rules of Court, rule 8.155 and Code of Civil Procedure § 909.

**I. NEW EVIDENCE**

Exhibit A – Matthew Huzaineh Petition (AD-WS2 David Vs Superior Court LA.pdf)

Exhibit B – Huzaineh Statement of Truth (ACD-13\_Huzaineh\_Statement\_of\_Truth.pdf.pdf)

Exhibit C – Garofalo Declaration (AD-2 to AD-5...pdf)

Exhibit D – Dr. Wexler TBI Email Chain (FRED-SISTER-MRI.pdf)

Exhibit E – Angelina Dettamanti ADA Emails (FRED=ANGELINA.pdf)

Exhibit F – Fred Heather Status Report (2021-12-07 Status Report.docx)

Exhibit G – Mary Rizzo Text Messages (Mary Rizzo Text Messages - Copy (3).pdf)

Exhibit H – Further Brain Scan Email Chain (fred kmnew.pdf)

Exhibit I – LALIVE Swiss Proceedings Recap (Alki David - proceedings in Switzerland...pdf)

Exhibit J – LALIVE Service Email (FRED-ALKI-swiss.pdf)

**II. MATERIALITY AND LEGAL BASIS**

This evidence is material, credible, and directly relevant to the issues on appeal, including extrinsic fraud, breakdown in representation, and deficiencies in the trial record. The evidence

could not reasonably have been presented below because counsel failed to act upon it while in possession of it. The resulting record is therefore not a reliable reflection of the available evidence at the time of trial.

### **III. RELIEF REQUESTED**

Appellant respectfully requests that the Court grant leave to augment the record with Exhibits A–J, consider this evidence in evaluating the integrity of the proceedings, and grant such further relief as is just and proper, including reversal, remand, or stay of enforcement.

This application is submitted to ensure the appellate record reflects material evidence that existed but was not presented due to failures in representation and process.

Dated: April 3, 2026

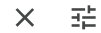
/s/ Alkiviades David

Alkiviades David

Appellant, In Propria Persona (Disabled)



fred.heather@angelina



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to Fred, Dana, Aaron, me

Dear Counsel:

I'm unsure what "unauthorized practice of law by a paralegal" even means -- I've made no offer to represent anyone in Court, nor have I and duces tecum subpoena power are all the purview of attorneys, not others. I want to be very clear that when working as a paralegal, I licensed attorney. During the day-to-day activities, if needed for clarification of legal issues, I have my own preferred attorneys to consult opinion, but no matter what they advise me about, I don't offer that in turn to anyone in a legal capacity. Again, I'm an ADA specialist/Advocate, an ADA advocate, and a paralegal, not an ADA Attorney, or any other type of attorney, and when I'm acting as a paralegal, I'm not acting as different roles with different things as they are permitted to do, and different responsibilities. I do not testify as an expert witness. I aid in request and if the client wishes to have me attend any and all hearings for their cases, depositions and any and all matters in which the Advocate present, I do so.

Now, as for my CV, I took two different ADA Certification Programs through Dr. Huffer for ADA Advocacy.

To your second item, I can hardly violate an NDA, and have Mr. David or any of the people he's working with, including the legal team, he honored -- you can't have your cake and eat it too. I choose to honor the NDA's I signed and take confidentiality seriously. That is why I request for the NDA's that you and Mr. Cole use, so I could ensure that I, and anyone I might work with, would have something similar to David's is completely protected. As the NDA are very standard and I use them regularly to ensure that a client is protected, as that is my role in any capacity. By doing so, it protects the client(s) and myself, therefore I am sure that you are all very aware of the great import business practices.

To your third item, I do not serve as a witness, expert or otherwise. I consult with clients and their attorneys, or anyone the client needs re issues, and at the clients request, I can serve as an ADA accommodation assistant/advocate and to additionally help facilitate dialogue, and disabilities have a difficulty with expressing themselves, when they become symptomatic. Which is clearly occurring when someone intent exploiting his disability or when he becomes symptomatic, then becomes frustrated and feels that he is not being heard. An ADA Accommodation the accommodations granted, often steps in when someone who has a disability like PTSD and LAS, impacting their ability to communicate for the client, so that they are no longer under direct stress.

This can take the form of acting as liaison, or sideline "referee" to stop-gap whatever is causing the issue, then inform the person in control issue, and it must be addressed. Sometimes that means requesting a brief recess, or even just a minute for the client to "cool off" "calm down" them of their distressed state that is disabling them. This is by no means an exhaustive list, it just depends on the accommodations that are addressed prior to any and all court hearings and they are to be in place so it is not discussed in open court or in the presence of adverse



fred.heather@angelina



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Send



**Alki David** <filmonpersonal@gmail.com>  
to Fred, Dana

Tue, May

Do not show this to anyone. Especially my sister.

--  
Alki David

- [www.anakando.com](http://www.anakando.com)
- Entertainment
- [www.FilmOn.com](http://www.FilmOn.com)
- [www.hologramusa.com](http://www.hologramusa.com)
- [www.mondotunes.com](http://www.mondotunes.com)
- News Sites
- [www.tvmix.com](http://www.tvmix.com)
- [www.shockya.com](http://www.shockya.com)



**Dana Cole** dana@danacolelaw.com [via](#) danacolelaw.onmicrosoft.com  
to alki@filmon.com, Fred

Tue, May

I'm only sent it to you and fred.

Sent from my Galaxy





fred.heather@angelina



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# July 15, 2024 ltr to Fred Heather requesting Akli's client file for the case Jane Doe David et al. case No. 20STCV37498



**Angelina Dettamanti** <adettamanti61717@gmail.com>  
to me, immigrationlaw.plus, Esq.

Mon, Jul

Hello All:

Attached is the letter sent by FedEx today, to Mr. Fred Heather.

Best personal regards,  
Angelina Dettamanti

--  
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Meeting for Alki's cases/ADA Inbox x



**Angelina Dettamanti** <adettamanti61717@gmail.com>  
to Dana, Fred

Tue, May

Good evening gentlemen,

As requested last week, during the phone conversation and as precociously, requested a meeting with the two of you, to discuss the ADA accommodations with out any issues, as alki should have had his accommodations in place for the past legal cases and for sure Alki needs it going forward.

I have been awaiting to hear from the two of you, as to what time and day would be best for you to meet? Please advise, as I do not wan accommodation, will be very helpful for the legal team and all.

I'm closing, I have reviewed some material, that suggest a possible conservatorship for Alki. That's absolutely the most ridiculous thing I to Brittany spears Alki, so they can make more money off him, however no expert for ADA would ever recommend that. Alki doesn't need like a humane and to have his ADA Accommodation, in place, in order to prevent what's been occurring. Alki is bright and talented persor up in the legal world, that's been absolutely hard on Alki, his family, his relationships, business life and his creativity, which most importan

I am really looking forward to working with the two of you, in order to get Alki's ADA accommodation and to get things moved forward and life, free of court nonsense! As life is far to short for it! Time is something that is so valuable and one can not get back! Alki has lost a sub benefit to or for him, his family and as an entrepreneur/business man.

Thank you in advanced. I look forward to securing a date and time, for the meeting, sooner than later.

Best personal regards,  
Angelina Dettamanti

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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES

DEPARTMENT 14

HON. TERRY A. GREEN, JUDGE

LAUREN REEVES, )  
 )  
 PLAINTIFF, )  
 )  
 VS. )  
 HOLOGRAM, U.S.A., INC.; ALKI )  
 DAVID PRODUCTIONS, INC.; )  
 ALKIVIADES DAVID, AN individual, )  
 DOES 1 THROUGH 25, INCLUSIVE, )  
 )  
 DEFENDANTS. )  
 )

CASE NO. BC643099

REPORTER'S TRANSCRIPT OF PROCEEDINGS  
OCTOBER 4, 2019; OCTOBER 7, 2019

APPEARANCES:

FOR PLAINTIFF: ALLRED, MAROKO & GOLDBERG  
NATHAN GOLDBERG, ESQ.  
DOLORES Y. LEAL, ESQ.  
RENEE MOCHKATEL, ESQ.  
6300 WILSHIRE BOULEVARD, SUITE 1500  
LOS ANGELES, CALIFORNIA 90048

FOR DEFENDANTS: VENABLE LLP  
ELLYN S. GAROFALO, ESQ.  
AMIR KALTGRAD, ESQ.  
2049 CENTURY PARK EAST, SUITE 2300  
LOS ANGELES, CALIFORNIA 90067

REPORTED BY: JEANESE JOHNSON, CSR NO. 11635  
OFFICIAL REPORTER PRO TEMPORE

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MASTER INDEX

OCTOBER 4, 2019; VOLUME 13

ALPHABETICAL/CHRONOLOGICAL INDEX OF WITNESSES

| <u>PLAINTIFF'S</u> | <u>DIRECT</u> | <u>CROSS</u> | <u>REDIRECT</u> | <u>RECROSS</u> |
|--------------------|---------------|--------------|-----------------|----------------|
| MEYER, C. BUF      |               | 3757         | 3795            |                |

CHRONOLOGICAL INDEX OF WITNESSES

| <u>DEFENDANTS'</u>        | <u>DIRECT</u> | <u>CROSS</u> | <u>REDIRECT</u> | <u>RECROSS</u> | <u>F. DIR</u> | <u>F. RE-X</u> |
|---------------------------|---------------|--------------|-----------------|----------------|---------------|----------------|
| WEISMAN,<br>CORY          | 3611          | 3629         | 3637            |                |               |                |
| DAVID,<br>ALKIVIADES      |               |              | 3641            |                |               |                |
| JOHNSON,<br>ALLISON BOTTO | 3691          | 3707         | 3743            | 3751           | 3753          | 3755           |

ALPHABETICAL INDEX OF WITNESSES

| <u>DEFENDANTS'</u>        | <u>DIRECT</u> | <u>CROSS</u> | <u>REDIRECT</u> | <u>RECROSS</u> | <u>F. DIR</u> | <u>F. RE-X</u> |
|---------------------------|---------------|--------------|-----------------|----------------|---------------|----------------|
| DAVID,<br>ALKIVIADES      |               |              | 3641            |                |               |                |
| JOHNSON,<br>ALLISON BOTTO | 3691          | 3707         | 3743            | 3751           | 3753          | 3755           |
| WEISMAN,<br>CORY          | 3611          | 3629         | 3637            |                |               |                |



1 CASE NUMBER: BC643099  
2 CASE NAME: REEVES VS. HOLOGRAM USA, INC.  
3 LOS ANGELES, CALIFORNIA FRIDAY, OCTOBER 4, 2019  
4 DEPARTMENT 14 HON. TERRY A. GREEN, JUDGE  
5 APPEARANCES: (AS HERETOFORE NOTED.)  
6 REPORTER: JEANESE JOHNSON, CSR 11635  
7 TIME: 9:20  
8

9 --o0o--

10  
11 HON. T.A. GREEN: OKAY. JURY IS NOT PRESENT.  
12 COUNSEL IS PRESENT.

13 HAVE THEY BUZZED YET?

14 THE COURT REPORTER: I DON'T THINK SO, YOUR  
15 HONOR.

16 HON. T.A. GREEN: OKAY. WE'RE READY. OKAY. SO  
17 THERE'S BEEN A SLIGHT CHANGE IN PLANS. I HAVE TO LEAVE  
18 AT 3:15, SO YOU'LL HAVE FROM 1:30 UNTIL 3:15 TO DO THE  
19 WITNESS.

20 MR. GOLDBERG: WE HAVE DR. MEYER AT 1:30. I  
21 DON'T KNOW WHETHER THEY CAN FINISH HER OR NOT IN 45  
22 MINUTES OR NOT -- I DON'T KNOW.

23 HON. T.A. GREEN: THAT'S ACTUALLY A LONG TIME.

24 MS. GAROFALO: THERE'S A LOT TO COVER, YOUR  
25 HONOR.

26 BUT BEFORE WE START, WE DO HAVE TWO ISSUES.

27 HON. T.A. GREEN: OKAY.

28 MS. GAROFALO: THE FIRST BEING THE INCIDENT

1           ACTIONS?

2           MS. GAROFALO:   HE HAS NOT.

3           HON. T.A. GREEN:   OKAY.   NOW, CAN WE GET STARTED?

4           MR. GOLDBERG:   AS FAR AS I'M CONCERNED, YES.

5           HON. T.A. GREEN:   ALL RIGHT.   SO BE THINKING OF  
6           WAYS TO SPEAK FAST IN THE AFTERNOON.

7           THE COURT REPORTER:   NO.

8           MS. GAROFALO:   JUST, YOUR HONOR, SCHEDULING  
9           PURPOSES, IF YOU HAVE THIS HEARING ON MONDAY, WHEN WOULD  
10          IT HAPPEN?

11          HON. T.A. GREEN:   WHENEVER IT'S CONVENIENT.  
12          WHATEVER IS -- IT DEPENDS WHERE WE ARE IN THE TRIAL.   IF  
13          WE WRAPPED UP THE TESTIMONY, WE CAN DO IT AFTER THAT.  
14          IF YOU HAVEN'T WRAPPED UP THE TESTIMONY, WE CAN DO IT AT  
15          NIGHT.   IT'S WHATEVER YOU WANT.

16          MS. GAROFALO:   OKAY.

17          HON. T.A. GREEN:   OKAY.   LET'S BRING THE JURY IN.

18          OKAY.   ON THE RECORD, THE JURY IS PRESENT.

19          COUNSEL IS PRESENT.

20          YOU WERE HERE AT 9:17, THANK YOU, AND IT'S NOW 9:31.

21          ALL RIGHT.   OKAY.

22          DEFENSE -- I HAD A SMALL CALENDAR.   OKAY.

23          DEFENSE, THE FLOOR IS YOURS.

24          MS. GAROFALO:   DEFENSE WOULD LIKE TO CALL CORY  
25          WEISMAN.

26          HON. T.A. GREEN:   ALL RIGHT.   MR. WEISMAN.

27          GOOD MORNING, SIR.   STAND RIGHT THERE AND MR.

28          CLERK WILL SWEAR YOU IN.

1 THE WITNESS: ALL RIGHT.

2 THE CLERK: PLEASE RAISE YOUR RIGHT HAND. DO YOU  
3 SOLEMNLY STATE THAT THE TESTIMONY YOU'RE ABOUT TO GIVE  
4 IN THE CAUSE NOW PENDING NOW PENDING BEFORE THIS COURT  
5 SHALL BE THE TRUTH, THE WHOLE TRUTH AND NOTHING BUT THE  
6 TRUTH, SO HELP YOU GOD?

7 THE WITNESS: I DO.

8 THE CLERK: PLEASE, YOU MAY HAVE A SEAT, SIR.

9 SIR, WOULD YOU PLEASE STATE AND SPELL YOUR NAME  
10 FOR THE RECORD.

11 THE WITNESS: C-O-R-Y W-E-I-S-M-A-N.

12 HON. T.A. GREEN: OKAY. WELCOME, SIR.

13 PLEASE PROCEED.

14

15 DIRECT EXAMINATION

16 MS. GAROFALO:

17 Q GOOD MORNING, WEISMAN. I'M ELLYN GAROFALO AND I  
18 REPRESENT MR. DAVID AND THE COMPANIES WHO HAVE BEEN SUED  
19 IN THIS CASE.

20 WE HAVEN'T MET BEFORE TODAY, HAVE WE?

21 A NO, WE HAVE NOT.

22 Q HAVE WE SPOKEN BEFORE TODAY?

23 A NEVER.

24 Q WHAT IS YOUR OCCUPATION?

25 A I'M SELF-EMPLOYED. I HAVE A COMPANY.

26 Q WHAT KIND OF WORK DO YOU DO?

27 A I DO -- I'M IN THE ENTERTAINMENT INDUSTRY, I  
28 MANAGE ARTISTS.

1 Q AND WHO WERE YOU EMPLOYED BY IN 2015?

2 A I WAS EMPLOYED BY HOLOGRAM USA.

3 Q WHAT ABOUT 2016?

4 A SAME.

5 Q AND IN 2015, WHAT WAS YOUR JOB AT HOLOGRAM?

6 A I WAS ONE OF THE SALES MANAGERS FOR THE HOLOGRAM  
7 DIVISION. I WAS IN CHARGE OF VENUE MANAGEMENT, SO I  
8 TRAVELED THE COUNTRY AND WORKED WITH MR. DAVID ACQUIRING  
9 VENUES FOR DISPLAY OF HIS TECHNOLOGIES.

10 Q OKAY. AND HOW ABOUT 2016?

11 A SAME.

12 Q WHEN DID YOU BEGIN WORKING AT HOLOGRAM?

13 A 2014.

14 Q PRIOR TO WORKING AT HOLOGRAM -- DO YOU REMEMBER  
15 WHEN IN 2014?

16 A MAY.

17 Q AND PRIOR TO WORKING AT HOLOGRAM OR BEGINNING  
18 WORK AT HOLOGRAM IN 2014, HAD YOU WORKED WITH MR. DAVID  
19 OR ANY OF HIS COMPANIES?

20 A NO, I HAD NEVER MET HIM BEFORE I WENT TO WORK FOR  
21 HIM.

22 Q HOW LONG DID YOU WORK WITH HOLOGRAM?

23 A ALMOST FOUR YEARS.

24 Q SO UNTIL APPROXIMATELY 2018?

25 A YES.

26 Q AND DO YOU RECALL WHEN IN 2018 YOU LEFT THE  
27 COMPANY?

28 A RIGHT AROUND THE END OF 2017, JANUARY OF 2018,

1 APPROXIMATELY.

2 Q AND IF YOU DON'T MIND TELLING US, DID YOU LEAVE  
3 VOLUNTARILY?

4 A YES.

5 Q AND JUST VERY BRIEFLY, WHAT WAS THE REASON FOR  
6 YOUR DEPARTURE?

7 A WELL, THE OFFICES IN BEVERLY HILLS WHERE I WORKED  
8 OUT OF HAD CLOSED AND THEY OPENED THE THEATRE ON  
9 HOLLYWOOD BOULEVARD AND I HELPED WITH THE DEVELOPMENT OF  
10 THE THEATRE. AND ONCE THE THEATRE WAS OPENED, MY  
11 SERVICES WERE NO LONGER NEEDED IN THAT RESPECT, SO I  
12 DECIDED TO START MY OWN COMPANY AT THAT TIME WITHOUT  
13 HAVING TO REINVENT MY JOB THERE.

14 Q AND WAS THERE ANY REASON OTHER THAN WHAT YOU'VE  
15 DESCRIBED FOR YOUR DECISION TO LEAVE HOLOGRAM?

16 A NO. NONE.

17 Q WHILE YOU WORKED AT HOLOGRAM, LET'S START WITH  
18 2015, DID YOU KNOW LAUREN REEVES?

19 A WELL, I DON'T KNOW THE DATES WHEN I KNEW HER, BUT  
20 I HAVE MET HER BEFORE AT THE COMPANY, YES.

21 Q OKAY. AND IN WHAT CAPACITY DID YOU MEET HER?

22 A SHE WAS A FREELANCE COMIC WRITER THAT I REMEMBER  
23 AND SHE WAS FRIENDS WITH ANOTHER EMPLOYER THERE. AND  
24 SHE HAD COME IN TO TRY TO HELP US WITH SOME COMEDY  
25 WRITING FOR SOME OF OUR HOLOGRAPHIC SHOWS THAT WE WERE  
26 ABOUT TO PRODUCE.

27 Q OKAY. NOW, DO YOU RECALL WHEN MS. REEVES BEGAN  
28 TO WORK ON THE HOLOGRAM SHOWS?

1           A NO, I DON'T BELIEVE SHE EVER ACTUALLY WORKED ON A  
2 HOLOGRAM SHOW. I THINK SHE CAME IN AND HELPED DEVELOP  
3 SOME IDEAS, THEN BROUGHT IN COMEDIANS FOR AUDITIONS AND  
4 THINGS, BUT WE NEVER ACTUALLY PRODUCED ANY CONTENT WITH  
5 MS. REEVES THAT I KNOW OF.

6           Q OKAY. NOW, IN 2016, YOU WERE STILL WORKING IN  
7 SALES AT HOLOGRAM; IS THAT RIGHT?

8           A I WAS -- SALES AT HOLOGRAM. AND I ALSO TOOK ON  
9 AN ADDITIONAL ROLE OF SELLING TIME ON OUR TELEVISION  
10 NETWORK, FOTV, SO I HAD A DUAL ROLE AT THE COMPANY AT  
11 THE TIME.

12          Q OKAY. YOU WERE NOT INVOLVED, HOWEVER, IN THE  
13 WRITING OF SCRIPTS OR --

14          A NO, I WAS NOT NEVER.

15          Q -- AND DEVELOPING SHOWS?

16          A NO, I WAS NOT. I WAS INVOLVED IN ACQUIRING SHOWS  
17 THAT WERE ALREADY BEING DEVELOPED OUTSIDE THE COMPANY,  
18 BUT NOT ON DEVELOPING THE SHOWS WITH MS. REEVES.

19          Q OKAY. AND WERE YOU AWARE OF THE TYPE OF MATERIAL  
20 THAT MS. REEVES WAS CREATING OR OUTLINING FOR HOLOGRAM?

21          A WELL, ALL THE CONTENT FOR HOLOGRAM USA AND FOR  
22 OUR FOTV NETWORKS WAS COMEDY, IT HAD AN ADULT EDGE TO IT  
23 AND IT WAS A VERY -- IT WAS A VERY -- I WOULD SAY TO  
24 SOME PEOPLE SHOCKING, SHOCKING KIND OF COMEDY. THAT WAS  
25 LIKE THE HOWARD STERN TYPE OF SHOCK WHEN IT WAS MORE  
26 ADULT HUMOR THAN STAND UP IN A CLUB OR SOMETHING OF THAT  
27 NATURE.

28          Q AND HOW DO YOU KNOW -- STRIKE THAT.

1 DO YOU KNOW WHETHER MS. REEVES WAS INVOLVED IN  
2 DEVELOPING THIS KIND OF EDGY, RAUNCHY HUMOR YOU'VE JUST  
3 DESCRIBED?

4 A YES. ALL OF OUR CONTENT WAS BASED ON THAT --  
5 BASED ON THAT GENRE.

6 Q DID YOU HAVE PERSONAL CONTACT OR INTERACTIONS  
7 WITH MS. REEVES?

8 A I DID.

9 Q AND HOW, IF YOU CAN ESTIMATE, HARD QUESTION, HOW  
10 FREQUENTLY IN 2016 WHILE MS. REEVES WAS WORKING WITH  
11 HOLOGRAM, DO YOU THINK YOU HAD INTERACTIONS WITH HER?

12 A I THINK I'VE ONLY HAD INTERACTIONS WITH HER ABOUT  
13 A HALF A DOZEN TIMES, WHICH IS ALMOST EVERY TIME THAT  
14 SHE CAME TO WORK I BELIEVE BECAUSE SHE WASN'T A DAILY  
15 EMPLOYEE, SHE WAS FREELANCE AND SHE CAME IN. I WOULD  
16 SEE HER ONCE A WEEK OR ONCE EVERY TWO WEEKS OR SOMETHING  
17 LIKE THAT DURING THE TIME THAT SHE -- THAT I WAS AWARE  
18 THAT SHE WAS WORKING WITH US AND MAYBE A HALF A DOZEN  
19 TIMES AT THE MOST I'VE SEEN HER.

20 Q ON ANY OF THE OCCASIONS WHEN YOU SAW MS. REEVES,  
21 DID YOU WITNESS MR. DAVID DOING -- STRIKE THAT.

22 HAVE YOU EVER SEEN MR. DAVID WITH MS. REEVES?

23 A YES.

24 Q ABOUT HOW MANY TIMES?

25 A MAYBE THREE OF THE SIX TIMES THAT I'VE SEEN MS.  
26 REEVES.

27 Q OKAY. SO ABOUT HALF THE TIMES THAT YOU SAW MS.  
28 REEVES AT HOLOGRAM, YOU SAW HER WITH OR NEAR MR. DAVID;

1 CORRECT?

2 A CORRECT.

3 Q HOW OFTEN WERE YOU AT HOLOGRAM DURING THAT PERIOD  
4 OF TIME?

5 A EVERY DAY.

6 Q AND WERE YOU WITH THE THEATRE SITE OR --

7 A NO, I WAS IN THE OFFICES.

8 HON. T.A. GREEN: HANG ON, HANG ON. MADAM  
9 REPORTER HAS TO TAKE THIS DOWN AND THERE'S A TENDENCY IN  
10 ORDINARY CONVERSATION TO TALK -- ANSWER QUESTIONS  
11 RAPIDLY, BUT IT'S VERY HARD FOR THE REPORTER TO TAKE IT  
12 DOWN.

13 THE WITNESS: CERTAINLY.

14 HON. T.A. GREEN: SO HERE'S THE GAME PLAN.  
15 QUESTION, PAUSE; ANSWER PAUSE. QUESTION, PAUSE.

16 THE WITNESS: YES, SIR.

17 MS. GAROFALO: OKAY. I'M GOING TO TAKE THAT AS  
18 YOU BEING ADMONISHED AND NOT ME.

19 Q OKAY. SO TELL ME WHERE YOU WERE WORKING IN 2016  
20 GENERALLY.

21 A I WAS WORKING IN THE SAME OFFICE AS MR. DAVID AND  
22 ALL THE REST OF THE REGULAR EXECUTIVES FROM THE FIRM AT  
23 338 NORTH CANON DRIVE.

24 Q PERFECT. OKAY.

25 AND WERE YOU ON THE SAME FLOOR AS MS. REEVES AND  
26 MR. DAVID?

27 A YES.

28 Q AND HOW -- DID YOU HAVE A CUBICLE OR AN OFFICE?

1 A AN OFFICE.

2 Q HOW CLOSE WAS YOUR OFFICE TO MR. DAVID'S?

3 A WITHIN SHOUTING DISTANCE.

4 Q OH, NO, ANYTHING BUT SHOUTING.

5 A ABOUT 300 FEET.

6 HON. T.A. GREEN: NORTH AMERICA, YES.

7 THE WITNESS: APPROXIMATELY 300 FEET FROM MY  
8 ESTIMATION.

9 MS. GAROFALO:

10 Q COULD YOU SEE MR. DAVID'S OFFICE FROM YOUR  
11 OFFICE?

12 A YES.

13 Q AND IN PROXIMITY TO MS. REEVES' OFFICE, CAN YOU  
14 ESTIMATE HOW FAR YOUR OFFICE WAS?

15 A CAN I PLEASE RETRACT MY LAST STATEMENT? 300  
16 FEET, I JUST REALIZED, IS LIKE A HUNDRED YARDS, THAT'S  
17 MUCH TOO FAR AWAY. I WAS ACTUALLY RIGHT ACROSS THE  
18 HALL, SO MAYBE 30 FEET.

19 Q OKAY. CAN YOU SHOW US IN THIS COURTROOM?

20 A FROM HERE TO YOU IS ABOUT HOW FAR AWAY I WAS FROM  
21 MR. DAVID'S OFFICE.

22 HON. T.A. GREEN: YEAH, I DON'T HAVE  
23 MEASUREMENTS.

24 THE WITNESS: I DON'T EITHER, I'M SORRY.

25 HON. T.A. GREEN: IT'S THE LENGTH OF THE JURY  
26 BOX.

27 THE WITNESS: OKAY. I JUST REALIZED MY  
28 CALCULATIONS WERE OFF, I APOLOGIZE.

1 MS. GAROFALO:

2 Q OKAY. SO YOU COULD SEE MR. DAVID'S OFFICE;  
3 CORRECT?

4 A CORRECT.

5 Q DID YOU HAPPEN TO NOTICE WHETHER MR. DAVID'S DOOR  
6 WAS GENERALLY OPEN OR CLOSED?

7 A IT JUST DEPENDS IF HE HAD A MEETING GOING ON, BUT  
8 IT WAS RANDOM.

9 Q OKAY. AND TELL ME, AGAIN, HOW FAR WERE YOU FROM  
10 MS. REEVES' OFFICE.

11 A SHE DIDN'T HAVE AN OFFICE, SHE WORKED IN -- MR.  
12 NUSSBAUM, WHO IS ANOTHER EMPLOYEE OF THE FIRM, SHE  
13 WORKED WITH HIM CLOSELY. AND THEN I BELIEVE MAYBE THERE  
14 WAS AN EMPTY OFFICE SHE MAY HAVE OCCUPIED WHENEVER SHE  
15 WAS TEMPORARILY THERE FOR THE DAY, BUT I DON'T REALLY  
16 QUITE RECOLLECT THAT.

17 Q OKAY. AND HOW FAR WAS YOUR OFFICE FROM MR.  
18 NUSSBAUM'S?

19 A NEXT DOOR.

20 Q ALL RIGHT. SO YOU BELIEVE THAT YOU SAW MS.  
21 REEVES APPROXIMATELY SIX TIMES IN 2016?

22 A CORRECT.

23 Q AND DID YOU SPEAK WITH HER? OR WHEN YOU SAY THAT  
24 YOU SAW HER, WAS IT PASSING IN THE HALLWAY?

25 A NO, WE SPOKE ABOUT THE PROJECT THAT SHE WAS  
26 WORKING ON WITH DAVID NUSSBAUM, WE SPOKE ABOUT MANY  
27 THINGS. ABOUT HER BOYFRIEND, ABOUT DIFFERENT THINGS. I  
28 REMEMBER SHE WAS VERY PERSONABLE.

1 Q WHAT DID SHE TELL YOU ABOUT HER BOYFRIEND?

2 A JUST THAT HE WAS SOME STAR FROM SATURDAY NIGHT  
3 LIVE AND THAT HE WAS -- I DON'T KNOW, JUST BRAGGING  
4 ABOUT HER BOYFRIEND KIND OF STUFF.

5 Q OKAY. NOW, THE SIX TIMES THAT YOU SAW HER, WERE  
6 THEY SPREAD OUT OVER A PERIOD OF TIME, OR?

7 A YES.

8 Q OKAY. SO YOU SAW HER INTERMITTENTLY THROUGHOUT  
9 THE TIME SHE WAS THERE; IS THAT CORRECT?

10 A CORRECT.

11 Q AND YOU SAW HER THREE TIMES, I THINK YOU SAID,  
12 WITH MR. DAVID; CORRECT?

13 A APPROXIMATELY.

14 Q AND CAN YOU DESCRIBE ANY OF THOSE INCIDENTS IN  
15 DETAIL?

16 A THEY WERE GENERALLY CREATIVE MEETINGS. I  
17 REMEMBER ONE DISTINCTLY WHERE I WALKED INTO MR. DAVID'S  
18 WITH HER TO TALK ABOUT SOME IDEAS ABOUT SOME TALENT THAT  
19 SHE HAD THAT SHE WANTED TO BRING IN FOR AUDITIONS. AND  
20 HER AND MR. NUSSBAUM WERE WORKING ON A CONCEPT, AND SO I  
21 JUST ATTENDED THE MEETING, BRIEF MEETING, IT WAS MAYBE  
22 LESS THAN FIVE MINUTES LONG AND WE JUST TALKED BUSINESS  
23 AND THAT WAS BASICALLY IT.

24 Q DO YOU REMEMBER ANY OTHER INCIDENT WITH CLARITY  
25 IN WHICH YOU SAW MR. DAVID AND MS. REEVES TOGETHER?

26 A A FEW TIMES IN MR. NUSSBAUM'S OFFICE, WE WERE ALL  
27 -- ALL FOUR OF US IN THERE DISCUSSING PROJECTS.

28 Q DURING ANY OF THE OCCASIONS THAT YOU SAW MR.

1 DAVID WITH MS. REEVES, DID MR. DAVID DO OR SAY ANYTHING  
2 THAT YOU CONSIDERED TO BE INAPPROPRIATE?

3 A NO.

4 Q DID YOU EVER SEE MR. DAVID TOUCH MS. REEVES IN  
5 ANY WAY?

6 A NO.

7 Q DID YOU EVER SEE MR. DAVID THREATEN MS. REEVES?

8 A NO.

9 Q DID YOU EVER HEAR MR. DAVID THREATEN ANYBODY WITH  
10 PHYSICAL HARM?

11 A NEVER.

12 Q WHAT WAS YOUR EXPERIENCE WORKING AT HOLOGRAM  
13 LIKE?

14 A WELL, MY EXPERIENCE WAS PROBABLY LIKE MANY OF THE  
15 PEOPLE THAT WORK THERE, IT WAS A FUN PLACE, IT WAS  
16 JOVIAL. THERE WAS A LOT OF DIFFERENT PROJECTS ALL THE  
17 TIME, SO IT WAS NOT VERY CORPORATE, IT WAS A VERY LOOSE  
18 ENVIRONMENT AS FAR AS THE WAY THAT PEOPLE CAME AND  
19 DRESSED AND ACTED. I WAS A FORMER TALENT AGENT, SO I  
20 WAS USED TO DRESSING UP IN A SUIT AND TIES AND MUCH MORE  
21 CORPORATE. AND THIS WAS A MUCH MORE LIKE CREATIVE  
22 ENVIRONMENT I WOULD DESCRIBE IT AS.

23 CAN I JUST GRAB SOME WATER OUT OF HERE?

24 HON. T.A. GREEN: YES.

25 THE WITNESS: I'M SORRY FOR THE DELAY. THANK  
26 YOU.

27 MS. GAROFALO:

28 Q OKAY. SO DID YOU EVER HEAR MR. DAVID SAY

1 ANYTHING IN MS. REEVES' PRESENCE THAT YOU CONSIDERED TO  
2 BE INAPPROPRIATE?

3 A NO. I WILL QUALIFY THAT. MR. DAVID, AS WELL AS  
4 OTHER EMPLOYEES OF THE FIRM, USED TO USE CURSE LANGUAGE  
5 ONCE IN A WHILE IN A -- IN A -- IN AN ALMOST JOKING WAY  
6 AND THINGS OF THAT NATURE. BUT AS FAR AS INAPPROPRIATE,  
7 NOBODY EVER SEEMED OFFENDED BY IT AND IT WAS A GROUP  
8 KIND OF A THING, SO THERE WAS NOTHING INAPPROPRIATE OR  
9 OFFENSIVE THAT I'VE EVER WITNESSED.

10 Q NOW, ANY OF THE TIMES THAT YOU SAW MS. REEVES IN  
11 2016, DID SHE COMPLAIN TO YOU ABOUT ANY CONDUCT BY MR.  
12 DAVID?

13 A ONCE SHE WAS IN MR. NUSSBAUM'S OFFICE AND HAD  
14 SAID THAT, I GUESS, MR. DAVID, ACCORDING TO HER, HAD  
15 TRIED TO KISS HER OR SOMETHING AND I LAUGHED IT OFF. I  
16 THOUGHT -- I THOUGHT IT WAS A JOKE, I DIDN'T REALIZE AND  
17 SHE DIDN'T SEEM VERY UPSET BY IT, SHE KIND OF SMILED  
18 WHEN SHE SAID IT.

19 Q OKAY. SO I WANT YOU TO DESCRIBE HOW YOU -- HOW  
20 SHE SAID IT TO YOU. IN A COMPLAINING WAY? IN A  
21 FRIGHTENED WAY? IN A HAPPY WAY? TELL ME WHAT YOU  
22 OBSERVED OF MS. REEVES' DEMEANOR WHEN SHE TOLD YOU THAT  
23 MR. DAVID HAD TRIED TO KISS HER.

24 A WELL, SHE SAT IN A CHAIR, MR. NUSSBAUM WAS IN A  
25 CHAIR, I WAS STANDING AT THE DOOR, AND THEY WERE TALKING  
26 ABOUT BUSINESS OR WHATEVER AND SHE -- I WALKED IN AND  
27 THAT JUST CAME UP IN CONVERSATION BETWEEN THEM AND I HAD  
28 SAID, GET OUT OF HERE, I WAS LIKE -- I WAS KIND OF LIKE

1           -- AND SHE SMILED AND HE SAID THAT'S NOT FUNNY AND THAT  
2           WAS. AND I -- THAT WAS LIKE THE END OF THE  
3           CONVERSATION, THERE WAS NOTHING REALLY EMOTIONAL ABOUT  
4           IT, THERE WAS NOTHING TOO DRAMATIC OR SINCERE. I  
5           THOUGHT IT WAS A JOKE AT FIRST.

6           Q AND IS IT YOUR SPECIFIC RECOLLECTION THAT MS.  
7           REEVES WAS SMILING DURING THE CONVERSATION?

8           A YES.

9           Q AND IT WAS YOUR PERCEPTION THE CONVERSATION WAS  
10          BEING HAD IN A JOKING MANNER?

11          A YES, THAT'S MY PERCEPTION.

12          Q OKAY. AND ANY OTHER TIME THAT MS. REEVES SAID  
13          ANYTHING TO YOU ABOUT MR. DAVID'S CONDUCT TOWARD HER?

14          A NO.

15          Q AND WHAT WERE YOUR OBSERVATIONS ABOUT MS. REEVES'  
16          DEMEANOR IN THE OFFICE ON THE SIX OCCASIONS THAT YOU SAW  
17          HER?

18          A I THOUGHT SHE WAS HAPPY AND SHE ENJOYED WORKING  
19          THERE AND SHE THOUGHT IT WAS A GOOD OPPORTUNITY. AND I  
20          THINK THAT -- I THINK THAT SHE HAD WANTED TO HAVE A  
21          FULL-TIME JOB THERE, BUT IT WASN'T AVAILABLE BECAUSE  
22          DAVID, I GUESS, HAD -- SINCE THEY HAD A PERSONAL  
23          FRIENDSHIP PRIOR, HE HAD RECOMMENDED HER FOR THE JOB  
24          BECAUSE WE NEEDED TO EXPAND AT THAT TIME. AND SO SHE  
25          WAS BEING ON A TRIAL BASIS TYPE OF THING FROM MY  
26          RECOLLECTION.

27          Q I WANT YOU TO TELL ME WHAT WAS THE BASIS FOR YOUR  
28          IMPRESSION WHEN YOU OBSERVED MS. REEVES THAT SHE WAS

1 HAPPY.

2 A WELL, SHE WAS ALWAYS SMILING AND ALWAYS IN A VERY  
3 COMFORTABLE MODE AND ALWAYS TALKING CREATIVELY AND I  
4 FELT LIKE SHE FIT IN THERE. I DIDN'T REALIZE AT THE  
5 TIME THAT THERE WAS ANY PROBLEM FROM HER POINT OF VIEW.

6 Q WHEN YOU SAY "FIT IN," ARE THERE PEOPLE WHO WOULD  
7 NOT FIT INTO THE ENVIRONMENT AT HOLOGRAM?

8 A SURE.

9 Q TELL ME WHAT YOU MEAN.

10 A WELL, IF SOMEBODY WAS -- LIKE I HAD DESCRIBED  
11 MYSELF, COME FROM A CORPORATE WORLD AND NOT USED TO THE  
12 CREATIVE WORLD AND THE ENVIRONMENT WHERE COMEDY IS BEING  
13 CREATIVE AND PEOPLE ARE BANTERING BACK AND FORTH TO TRY  
14 TO COME UP WITH FUNNY, JOKING SCENARIOS FOR TELEVISION  
15 SHOWS AND THINGS, THAT'S KIND OF AN OUT OF THE ORDINARY  
16 JOB, SO IT MIGHT NOT FIT EVERYBODY'S PERSONALITY OR  
17 UPBRINGING IN BUSINESS. BUT FOR MYSELF AND MY POINT OF  
18 VIEW, I GREW UP WITH THE ENTERTAINMENT BUSINESS, SO IT  
19 WAS A VERY NORMAL ENVIRONMENT.

20 Q OKAY. SO PUTTING ASIDE MS. REEVES AND MR. DAVID,  
21 THE GENERAL ENVIRONMENT WAS -- HOW WOULD YOU DESCRIBE IT  
22 WHEN YOU SAY, "JOKING," WHAT?

23 A I WOULD DESCRIBE IT AS I'VE NEVER BEEN TO WORK  
24 THERE WHERE ANYBODY'S MADE ANY PERSONAL COMPLAINTS. A  
25 LOT OF PEOPLE SOMETIMES WERE -- EVERYBODY CAME TO WORK  
26 PRETTY HAPPY EVERY DAY. I MEAN, IT WAS JUST A FUN PLACE  
27 TO WORK. IT WAS A BIG OPPORTUNITY TO WORK WITH THIS GUY  
28 WHO WAS PUTTING LOTS OF MONEY INTO A NEW BUSINESS AND

1 NEW TECHNOLOGY. EVERYBODY SEEMED TO REALLY HUNT AND  
2 CLAW TO GET THEIR WAY INTO THE COMPANY BECAUSE IT WAS A  
3 VERY DESIRABLE PLACE TO WORK FROM MY POINT OF VIEW.

4 Q AND YOU SAID THAT FROM YOUR PERSPECTIVE, MS.  
5 REEVES THOUGHT IT WAS A GOOD OPPORTUNITY TO BE AT  
6 HOLOGRAM --

7 A A HUNDRED PERCENT. I DON'T REMEMBER --

8 Q HOLD ON, HOLD ON ONE MOMENT.

9 A GO AHEAD, I'M SORRY.

10 Q WHAT DO YOU BASE THAT ON?

11 A WELL, SHE KEPT COMING BACK WITH GOOD IDEAS AND  
12 GOOD IDEAS FOR TALENT AND I'VE BEEN IN THE TALENT  
13 BUSINESS 30 YEARS AND I DIDN'T KNOW SOME OF THE TALENT  
14 THAT SHE WAS AWARE OF, THAT SHE WAS CULTIVATING AND SO  
15 FORTH, SO IT WAS AN INTERESTING PERSON TO HAVE AROUND  
16 WITH NEW PERSPECTIVE AND SHE SEEMED TO ENJOY IT.

17 Q AND DID SHE EVER SAY TO YOU THIS IS A GREAT  
18 OPPORTUNITY, I LIKE WORKING WITH HOLOGRAMS?

19 A I DON'T RECALL THESE EXPLICIT WORDS, BUT THAT WAS  
20 THE IMPRESSION THAT WAS GIVEN TO ME.

21 Q OKAY. SHE SEEMED ENTHUSIASTIC ABOUT WORKING ON  
22 THE HOLOGRAMS TO YOU?

23 A YES.

24 Q NOW, WHEN YOU TALK ABOUT BANTERING IN THE OFFICE,  
25 WAS THERE BANTERING OF A SEXUAL NATURE?

26 A NO. BUT LIKE I HAD SAID, THERE WAS CURSE WORDS  
27 AND THINGS THROWN AROUND I WOULD THINK MORE FREQUENTLY  
28 THAN THERE WOULD BE IN A NORMAL CORPORATE WORK

1 ENVIRONMENT, BUT IT WAS COMPLETELY NORMAL FROM A  
2 CREATIVE TELEVISION DEVELOPMENT STANDPOINT, THAT IT WAS  
3 COMMON EVERY DAY. AND IN ANY COMPANY IN THIS TOWN, AND  
4 I'VE WORKED AT MANY OVER 30 YEARS, IT WAS A SIMILAR  
5 ENVIRONMENT, SO NOTHING THERE WAS SHOCKING IN ANY WAY.

6 Q CAN YOU GIVE US SOME EXAMPLES OF THE COMPANIES  
7 YOU'VE WORKED AT THAT YOU WOULD COMPARE TO HOLOGRAM?

8 MR. GOLDBERG: OBJECTION. 352, YOUR HONOR.

9 HON. T.A. GREEN: OVERRULED.

10 THE WITNESS: I'VE WORKED AT INTERNATIONAL  
11 CREATIVE MANAGEMENT, WHICH IS THE ONE OF THE BIG THREE  
12 TALENT AGENCIES IN LOS ANGELES. AND WE'VE REPRESENTED  
13 PEOPLE LIKE CHRIS ROCK AND HOWIE MANDEL, WHO ARE MY  
14 CLIENTS, AND MANY OTHER COMEDIANS WHO ARE IN THE SAME  
15 TYPE OF ENVIRONMENT, THE SAME TYPE OF LANGUAGE WITH  
16 BANTERING AROUND FREQUENTLY, SO. LIKE I SAID, COMMON  
17 PLACE IN THE INDUSTRY. IT WAS A STANDARD WORK PRACTICE  
18 THE WAY THAT THIS COMPANY OPERATED FROM MY POINT OF  
19 VIEW.

20 MS. GAROFALO:

21 Q OKAY. NOW, AND -- OKAY. DID MR. DAVID AS A BOSS  
22 SEEM COMPARABLE TO THE OTHER WORK ENVIRONMENTS YOU HAD  
23 BEEN IN?

24 MR. GOLDBERG: OBJECTION.

25 THE WITNESS: HE WAS A LITTLE BIT --

26 HON. T.A. GREEN: EXCUSE ME, WAIT.

27 THE WITNESS: I'M SORRY. I'LL SLOW DOWN.

28 MR. GOLDBERG: 352. I MEAN, OTHER WORK

1 ENVIRONMENTS.

2 HON. T.A. GREEN: WELL, I BELIEVE THAT PART OF  
3 THE DEFENSE THEORY IS THAT THIS IS A DIFFERENT TYPE OF  
4 WORK ENVIRONMENT.

5 MR. GOLDBERG: WELL, HE'S ALREADY SAID IT'S THE  
6 SAME AS ICM. OKAY. I'LL WITHDRAW THE OBJECTION.

7 HON. T.A. GREEN: WELL, IT'S CERTAINLY NOT  
8 SOMETHING THAT, YOU KNOW, I DIDN'T GROW UP IN A CREATIVE  
9 ENVIRONMENT, SO I DON'T KNOW. I'M MUCH MORE CORPORATE  
10 AS YOU WOULD SAY.  
11 SO OVERRULED.

12 MR. GOLDBERG: OKAY.

13 THE WITNESS: WHAT WAS THE QUESTION, I APOLOGIZE?

14 MS. GAROFALO:

15 Q WAS MR. DAVID COMPARABLE TO BOSSES IN SOME OF THE  
16 OTHER WORK ENVIRONMENTS?

17 A NO.

18 Q HOW WAS HE DIFFERENT?

19 A HE WAS A BILLIONAIRE AND HE WAS A JOVIAL PERSON  
20 WHO ENJOYED THE CREATIVE PROCESS. AND MORE CAREFREE  
21 ABOUT INVESTING AND HELPING PEOPLE ENVISION THEIR DREAMS  
22 THAN MOST BOSSES. MOST BOSSES ARE JUST ABOUT HAVING YOU  
23 THERE TO SERVE THEM. AND EVEN IN MY -- I WAS A  
24 VICE-PRESIDENT AT ICM AND I EVEN FELT LIKE AT A  
25 HIERARCHY, I HAD TO REPORT TO MY BOSSES. AND ALKI WOULD  
26 GET IN THE TRENCHES WITH US AND COME UP WITH CREATIVE  
27 IDEAS AND TRY TO ELEVATE US IN OUR CAREERS, SO I FELT  
28 VERY COMFORTABLE WITH THAT ENVIRONMENT, THAT'S HOW HE

1 DIFFERED.

2 Q NOW, CAN YOU RECALL WITH CLARITY ANY OF THE OTHER  
3 TIMES THAT YOU SAW MS. REEVES AT HOLOGRAM?

4 A WE HAD LUNCH MAYBE TWO, I THINK, TIMES AT A  
5 CHINESE RESTAURANT WITH DAVID NUSSBAUM AND I -- MAYBE  
6 ANOTHER EMPLOYEE. AND IT WAS ALL VERY NORMAL. I MEAN,  
7 THERE WAS NEVER ANY COMPLAINTS OR ANYTHING OF THAT  
8 NATURE THAT I COULD -- THAT I REMEMBER.

9 Q DO YOU REMEMBER THE LAST TIME YOU HAD LUNCH WITH  
10 HER, CAN YOU ESTIMATE A MONTH?

11 A THE DATE AND MONTH, IS THAT WHAT YOU SAID?

12 Q YEAH.

13 A NO, I DON'T.

14 Q OKAY. NOW, IS THE BANTERING IN THE OFFICE THAT  
15 YOU'VE JUST DESCRIBED, COMEDIC KIND OF BANTERING.  
16 HAD YOU EVER --

17 A CERTAINLY.

18 Q -- WITNESSED MS. REEVES PARTICIPATING IN THAT  
19 KIND OF BANTERING?

20 A YES.

21 Q DID SHE EVER SEEM TO YOU, APPEAR TO YOU, TO BE  
22 OFFENDED OR UPSET?

23 A NEVER.

24 Q DID YOU EVER SEE MS. REEVES IN THE OFFICE AT ANY  
25 TIME WHEN SHE APPEARED, AT LEAST TO YOU, TO BE UPSET,  
26 WITHDRAWN, OFFENDED?

27 A NO.

28 HON. T.A. GREEN: OKAY. GUYS, YOU'RE --

1 MS. GAROFALO: LET ME JUST FINISH.

2 Q ANYTHING OF THAT NATURE?

3 A NO.

4 Q DO YOU RECALL THE LAST TIME YOU SAW MS. REEVES?

5 A IT WOULD BE IN THE OFFICE, WHENEVER THAT WAS, IN  
6 2016.

7 Q AT SOME POINT -- DID MS. REEVES LEAVE AT SOME  
8 POINT?

9 A YES, BUT NOT WITH ANY FANFARE. I JUST -- PEOPLE  
10 CAME AND GO THERE BECAUSE THERE WAS A APPROXIMATELY A  
11 HUNDRED EMPLOYEES BETWEEN TWO COMPANIES AND SHE WAS  
12 TEMPORARY HELP, SO I DIDN'T REALLY PAY MUCH ATTENTION TO  
13 HER COMING AND GOING.

14 Q DID YOU SEE MS. REEVES ON THE DAY SHE LEFT?

15 A NO.

16 Q DID MS. REEVES EVER TELL YOU ANYTHING ABOUT THE  
17 CIRCUMSTANCES UNDER WHICH SHE LEFT?

18 A NO.

19 Q HAVE YOU SEEN OR SPOKEN TO MS. REEVES SINCE?

20 A NO, I HAVE NOT.

21 Q OKAY.

22 MS. GAROFALO: I HAVE NO FURTHER QUESTIONS.

23 HON. T.A. GREEN: THANK YOU.

24 CROSS.

25 MR. GOLDBERG: YES, YOUR HONOR.

26 ///

27 ///

28 ///

## CROSS EXAMINATION

1  
2 MR. GOLDBERG:

3 Q GOOD MORNING.

4 A GOOD MORNING.

5 Q YOU SPOKE TO A LAWYER FROM THE GLASER FIRM ABOUT  
6 THIS BEFORE YOU TOOK THE STAND, DIDN'T YOU?

7 A I GUESS. I DON'T KNOW. I DIDN'T SPEAK TO  
8 ANYBODY REALLY. I TEXTED A COUPLE TIMES.

9 Q SO YOU ARE TELLING US THAT COUNSEL BROUGHT YOU UP  
10 HERE, NEVER TALKED TO YOU AND YOU DIDN'T TALK TO ANY  
11 ATTORNEY ABOUT WHAT YOU KNEW OR DIDN'T KNOW ABOUT THIS  
12 SITUATION?

13 A THE ONE TIME I -- THE ONE TIME, I DID, YOU'RE  
14 CORRECT. I DIDN'T -- I DIDN'T KNOW YOU WERE JUST  
15 TALKING ABOUT --

16 Q OKAY. AS A MATTER OF FACT, DIDN'T YOU COME TO A  
17 MEDIATION WITH MR. DAVID IN THIS PARTICULAR CASE  
18 SOMETIME IN 2016?

19 A NEVER.

20 Q DIDN'T YOU APPEAR?

21 A WRONG GUY.

22 Q WERE YOU THERE BY YOURSELF WITH SOME LAWYERS?

23 A NEVER. I DON'T -- I DON'T EVEN KNOW WHAT YOU'RE  
24 TALKING ABOUT.

25 Q SO YOU'RE SAYING THAT YOU DON'T HAVE ANY  
26 RECOLLECTION OF HAVING COME TO A MEDIATION INVOLVING  
27 THIS CASE?

28 A HOW WOULD I HAVE A RECOLLECTION, I NEVER CAME TO

1 A MEETING.

2 Q OKAY. THAT'S FINE.

3 NOW, WITH REGARD TO YOUR RELATIONSHIP WITH MR.  
4 DAVID, DO YOU -- OUTSIDE OF THE WORK SITUATION YOU  
5 MENTIONED, DO YOU HAVE ANY KIND OF OTHER RELATIONSHIP  
6 WITH HIM?

7 A I DO NOT.

8 Q OKAY. DO YOU GO TO ANY KIND OF MEETINGS WITH  
9 HIM?

10 A I HAVE IN THE PAST.

11 Q WHEN'S THE LAST TIME YOU WENT TO ANY KIND OF  
12 MEETING WITH HIM?

13 A 2016.

14 Q AND DID YOU -- DO YOU HAVE -- HAVE YOU SEEN HIM  
15 SINCE THEN?

16 A YES, I HAVE.

17 Q WHEN'S THE LAST TIME YOU SAW MR. DAVID?

18 A OH, PROBABLY ABOUT FOUR MONTHS AGO.

19 Q OKAY. AND WHAT WAS THE -- WHAT WAS THE REASON  
20 YOU SAW HIM?

21 A I WAS WALKING PAST HIS THEATRE ON HOLLYWOOD  
22 BOULEVARD AND I STOPPED IN TO SAY HELLO.

23 Q OKAY. SO, NOW, WITH REGARD TO THE -- JUST TO  
24 CLARIFY THE TWO THINGS YOU SAID. LET'S START WITH THE  
25 TIME THAT YOU WERE IN AN OFFICE WITH MR. NUSSBAUM AND  
26 MS. REEVES AND SHE SAID THAT SHE HAD -- THAT ALKI HAD  
27 KISSED HER; CORRECT?

28 A NO.

1 Q WHAT DID YOU SAY?

2 A I SAID THAT -- SHE HAD SAID THAT HE HAD TRIED TO  
3 KISS ME AND HAD A SMILE ON HER FACE AND THAT WAS LIKE  
4 THE END OF THE CONVERSATION. I SAID, GET OUT OF HERE,  
5 AND THEY DIDN'T EXPOUND ON THAT FURTHER.

6 Q DIDN'T YOU SAY -- DID YOU MAKE A JOKE AT THAT  
7 TIME?

8 A NOT THAT I REMEMBER.

9 Q DID YOU SAY THAT "I DON'T UNDERSTAND THE PROBLEM,  
10 I'D SUCK HIS DICK IF HE ASKED ME TO"?

11 A ABSOLUTELY NOT.

12 Q AND --

13 A I DON'T KNOW WHERE YOU WOULD GET SOMETHING LIKE  
14 THAT, BUT THAT'S INSANE.

15 Q AND DID YOU TELL MR. DAVID THAT MS. REEVES HAD  
16 MENTIONED THAT HE TRIED TO KISS HER?

17 A NO, BECAUSE I THOUGHT SHE WAS JOKING.

18 Q YEAH.

19 DID YOU EVER SEE MR. DAVID IN THE WORKPLACE WITHOUT HIS  
20 CLOTHES ON?

21 A NO, I NEVER DID.

22 Q DID YOU EVER SEE HIM IN THE WORKPLACE WHERE HE  
23 WAS PARTIALLY CLOTHED?

24 A NO.

25 Q ARE YOU FAMILIAR WITH THE TERM "MAN-GINA"?

26 A I AM.

27 Q DO YOU KNOW WHETHER MR. DAVID EVER DID THE  
28 MAN-GINA AT WORK?

1           A NO, BUT I'VE HEARD STORIES IN THE PRESS AND SO  
2 FORTH, I DON'T KNOW IF I BELIEVE THEM, BUT I'VE NEVER  
3 SEEN IT MYSELF.

4           Q OKAY. AND DID YOU EVER SEE MR. DAVID PUT HIS  
5 HANDS ON THE NECK OF ANY WOMAN AT WORK?

6           A NEVER.

7           Q OKAY. DID YOU EVER SEE MR. DAVID TAKE A WOMAN'S  
8 FINGER AND PUT IT IN HIS MOUTH?

9           A NO.

10          Q YOU DON'T THINK HE WOULD DO THAT, DO YOU?

11          A I DON'T KNOW IF HE WOULD DO THAT, BUT I'VE NEVER  
12 SEEN THAT.

13          Q OKAY. DID YOU EVER SEE MR. DAVID GO UP TO  
14 SOMEBODY'S WINDOW AT WORK, TAKE OFF HIS SHIRT, PRESS HIS  
15 CHEST AND NIPPLES AGAINST THEIR OFFICE DOOR?

16          A IS THAT WHERE THE NIPPLES ARE ON THE CHEST? NO,  
17 I NEVER SAW. NO, I NEVER SAW ANYTHING LIKE THAT.

18          Q NEVER SAW THAT. UH-HUH.

19          DID YOU EVER SEE MR. DAVID TAKE OUT HIS BELT AT  
20 WORK AND USE IT ON A TABLE?

21          A NO.

22          Q UM-HMM.

23 NOW, YOU SAID THAT YOUR JOB WAS IN RELATIONSHIP TO THE  
24 HOLOGRAMS?

25          A CORRECT.

26          Q AND WERE YOU EVER PRESENT WHEN MS. REEVES BROUGHT  
27 COMEDIANS TO GO TO THE THEATRE DOWNSTAIRS ON THE FIRST  
28 FLOOR AND DO A DEMONSTRATION?

1 A YES.

2 Q HOW MANY TIMES WERE YOU PRESENT WHEN MS. REEVES  
3 DID THAT?

4 A ONCE OR TWICE.

5 Q OKAY. AND ARE YOU AWARE OF HOW MANY TIMES SHE  
6 ACTUALLY DID THAT?

7 A NO, I'M NOT.

8 Q OKAY. WAS -- THAT WAS PART OF WHAT SHE WAS  
9 SUPPOSED TO DO, CORRECT, IS SHOW --

10 A I WASN'T IN CHARGE OF MS. REEVES' WORK SCHEDULE  
11 SO ALL I KNEW WAS THAT SHE WAS HIRED TO HELP BRING  
12 COMEDIANS TO DO SOME WORK FOR US AS HOLOGRAPHIC  
13 STANDS-IN AND POSSIBLY WRITING SOME SKETCHES. THAT'S  
14 ALL I KNOW ABOUT HER JOB.

15 Q YOU MENTIONED SOMETHING ABOUT MATERIALS OR THINGS  
16 THAT MS. REEVES HAD WRITTEN IN CONNECTION WITH THE  
17 HOLOGRAM SHOWS; RIGHT?

18 A NO, I DIDN'T.

19 Q YOU DIDN'T.  
20 SO DID SHE WRITE ANY SCRIPTS WHILE SHE WAS WORKING AT  
21 HOLOGRAM?

22 A I ASSUME THAT WAS ONE OF HER ROLES, BUT I NEVER  
23 SAW ANY OF HER SCRIPTS.

24 Q SO DID YOU EVER SEE ANYTHING THAT MS. REEVES  
25 CREATED, WROTE?

26 A NO, I DID NOT.

27 Q AND WERE YOU HER BOSS?

28 A NO.

1 Q WHO WAS?

2 A I BELIEVE DAVID NUSSBAUM WAS HER BOSS.

3 Q UM-HMM.

4 A BUT THERE WAS -- IT WAS A VERY LOOSE STRUCTURE,  
5 WE ALL WORKED TOGETHER AS TEAMS. AND AS I SAID EARLIER,  
6 SHE WAS TEMPORARY AND NOT FULL-TIME HELP, SO SHE WAS IN  
7 AND OUT INTERMITTENTLY, SO I WASN'T CLEAR ON WHAT HER  
8 ROLE WAS OR WHO HER BOSS WAS, BUT SHE SEEMED TO BE VERY  
9 HAPPY DURING HER TIME THERE.

10 Q SURE.

11 BY THE WAY, YOU NEVER SAW MR. DAVID TAKE HIS PANTS DOWN  
12 AT WORK, DID YOU?

13 A NO.

14 Q OKAY. DID YOU EVER GET INTO AN ARGUMENT WITH MS.  
15 REEVES ABOUT CATCALLING WOMEN OUTSIDE THE HOLOGRAM  
16 STUDIO?

17 A ABOUT DOING WHAT?

18 Q CATCALLING WOMEN OUTSIDE THE HOLOGRAM STUDIO.

19 A I DON'T EVEN KNOW WHAT THAT IS.

20 Q OKAY. DO YOU RECALL MS. REEVES EVER TELLING YOU  
21 THAT WOMEN DON'T LIKE TO BE CATCALLED?

22 A NO, I DON'T.

23 Q DO YOU RECALL ANY ARGUMENT LIKE THAT BETWEEN  
24 YOURSELF AND MS. REEVES?

25 A NO.

26 Q DID YOU EVER TALK TO MS. REEVES ABOUT GOING BACK  
27 AND FORTH TO VEGAS, THAT YOU WERE GOING BACK AND --

28 A NOT THAT I CAN RECALL.

1 Q WERE YOU GOING BACK AND FORTH TO THE VEGAS DURING  
2 THE TIME IN 2016 WHEN MS. REEVES WAS AT THE HOLOGRAM  
3 THEATRE?

4 A I'VE BEEN TO VEGAS HUNDREDS OF TIMES FOR MY JOB  
5 AND ALSO PRIVATELY, SO I DON'T KNOW IF THAT EVER CAME UP  
6 IN OUR CONVERSATIONS. MOST OF OUR CONVERSATIONS WERE  
7 BRIEF AND ABOUT WORK, BUT I DON'T RECALL.

8 Q BUT YOU DON'T RECALL EVER TALKING TO MS. REEVES  
9 ABOUT THE REASONS YOU WERE GOING TO VEGAS, DID YOU?

10 A IF I DID, IT WOULD HAVE BEEN ABOUT HOLOGRAM  
11 SALES.

12 Q YEAH.  
13 NOW, YOU SAID THAT MR. DAVID -- THAT THERE WERE  
14 OCCASIONS WHEN YOU'D BE IN A MEETING WITH MR. DAVID AND  
15 MS. REEVES AND IT WAS A NORMAL BUSINESS MEETING;  
16 CORRECT?

17 A CORRECT.

18 Q AND ON HOW MANY OCCASIONS DID YOU SAY THAT YOU  
19 WERE PRESENT WHEN BOTH MR. DAVID AND MS. REEVES WERE  
20 PRESENT?

21 A MAYBE TWO TIMES -- TWO OR THREE TIMES, THE MOST.

22 Q AND ON THOSE OCCASIONS, WOULD YOU DESCRIBE IT AS  
23 A NORMAL BUSINESS MEETING?

24 A NORMAL, FRIENDLY, NO -- NOTHING OUT OF THE  
25 ORDINARY.

26 Q PEOPLE EXCHANGING IDEAS?

27 A CORRECT.

28 Q AND ON THOSE OCCASIONS, MR. DAVID DID NOT TOUCH

1 MS. REEVES; CORRECT?

2 A CORRECT.

3 Q HE DIDN'T SHOW OFF HIS MAN-GINA; RIGHT?

4 A NO.

5 Q HE DIDN'T PULL HIS PANTS DOWN?

6 A NO, HE DID NOT.

7 Q HE DIDN'T GRAB HER NECK?

8 A NOPE.

9 Q HE DIDN'T TAKE HIS FINGER AND PUT IT IN HIS  
10 MOUTH --

11 A NO.

12 Q -- OR ANY OF THAT CORRECT; CORRECT?

13 A RIGHT.

14 Q NOW, WERE YOU AWARE OF THE FACT THAT AT SOME  
15 POINT MS. REEVES WAS NO LONGER WORKING ON THE HOLOGRAM  
16 SIDE AND SHE WAS EMPLOYED WORKING ON A NEW SHOW?

17 A NO.

18 Q YOU DIDN'T KNOW THAT?

19 A NO.

20 Q DID YOU KNOW WHAT MS. REEVES' ROLE WAS AT THE  
21 COMPANY AT THE TIME THAT SHE LEFT THE COMPANY?

22 A I KNEW THAT SHE WAS COLLABORATING WITH MR.  
23 NUSSBAUM TO BRING IN COMEDIANS AND TALK -- AND TRY TO  
24 START SOME HOLOGRAPHIC COMEDIC TALENT AND SHOWS,  
25 DEVELOPMENT, I WOULD CALL IT.

26 Q YOU MENTIONED THERE WERE ABOUT A HUNDRED  
27 EMPLOYEES; IS THAT CORRECT?

28 A BETWEEN THE TWO COMPANIES MR. DAVID OWNED, YES.

1 Q WOULD THAT BE A FAIRLY ACCURATE ESTIMATE?

2 A IN MY OPINION, I COULD BE OFF BY 10 OR 20, BUT  
3 THAT'S -- I'D SAY --

4 Q AND HOW MANY OF THOSE PEOPLE WORKED ON THE  
5 HOLOGRAM SIDE?

6 A APPROXIMATELY A THIRD, MAYBE LESS THAN A THIRD.

7 Q ABOUT 30, MAYBE?

8 A 20 TO 30.

9 Q OKAY. AND -- HOLD ON ONE SECOND.

10 A THAT INCLUDES SALESPEOPLE AND EXECUTIVES.

11 Q I BEG YOUR PARDON?

12 A I SAID THAT INCLUDES SALESPEOPLE AND EXECUTIVES  
13 ENTIRELY, NOT JUST SALES.

14 Q ALL RIGHT.

15 MR. GOLDBERG: GIVE ME ONE SECOND, YOUR HONOR, IF  
16 I MAY. I JUST NEED TO CHECK SOMETHING.

17 HON. T.A. GREEN: SURE.

18 MR. GOLDBERG: I HAVE NOTHING FURTHER, YOUR  
19 HONOR.

20 HON. T.A. GREEN: THANK YOU.

21 REDIRECT.

22 MS. GAROFALO: JUST BRIEFLY.

23

24 REDIRECT EXAMINATION

25 MS. GAROFALO:

26 Q MR. WEISMAN, YOU JUST TOLD MR. GOLDBERG THAT  
27 THERE WERE A HUNDRED EMPLOYEES AROUND.

28 DO YOU KNOW HOW MANY OF THOSE WERE ACTUAL EMPLOYEES WITH

1 EMPLOYMENT AGREEMENTS?

2 A NO, I DON'T.

3 Q DO YOU KNOW HOW MANY -- WELL, LET ME ASK IT THIS  
4 WAY:

5 IT'S TYPICAL IN THE ENTERTAINMENT BUSINESS FOR PEOPLE TO  
6 WORK ON SHOWS AND LEAVE; CORRECT?

7 A CORRECT.

8 Q AND SOMETIMES PEOPLE WORK AS, I DON'T KNOW IF YOU  
9 KNOW THE LEGAL TERM, BUT INDEPENDENT CONTRACTORS AND  
10 THEY ARE NOT ACTUAL EMPLOYEES?

11 A CORRECT.

12 Q DO YOU KNOW THAT DISTINCTION?

13 A I DO KNOW THAT DISTINCTION.

14 Q OKAY. AND IF YOU KNOW, WHAT'S A LOAN-OUT  
15 COMPANY?

16 A A LOAN-OUT COMPANY IS A COMPANY THAT A PERSON WHO  
17 IS AN INDEPENDENT CONTRACTOR USES TO SET UP FOR THEIR  
18 TAX PURPOSES SO THAT THEY CAN PAY PAYROLL -- PAY TAXES  
19 ONCE THEY ARE PAID AS AN INDEPENDENT CONTRACTOR.

20 Q OKAY. AND ARE YOU --

21 A ACTORS AND OTHER CREATIVE PEOPLE, TRADITIONALLY  
22 PRODUCERS THAT ARE ON TEMPORARY JOBS, TRADITIONALLY HAVE  
23 THEIR OWN LOAN-OUT COMPANIES. I REPRESENTED MANY ACTORS  
24 OVER MY TIME, MOST OF THE ACTORS, IF NOT ALL, I CAN'T  
25 REMEMBER ONE THAT DIDN'T HAVE THEIR OWN LOAN-OUT  
26 COMPANY.

27 SO, FOR EXAMPLE, EDDIE MURPHY WOULD HAVE EDDIE MURPHY,  
28 INC. AND THAT WOULD BE HIS LOAN-OUT COMPANY. YOU WOULD

1 HAVE TO PAY EDDIE MURPHY, INC. SO HE COULD PAY TAXES TO  
2 THE GOVERNMENT AND YOU WOULDN'T HAVE TO AS THE EMPLOYER.

3 Q OKAY. SO WHEN YOU WORKED AS AN AGENT OR YOU'RE  
4 NOW A MANAGER, ARE YOU INVOLVED IN NEGOTIATING DEALS,  
5 CONTRACTS?

6 A I AM.

7 Q AND THEN YOU WOULD KNOW WHO THE PARTIES, IN OTHER  
8 WORDS, YOU WOULD KNOW WHO USED THE LOAN-OUT COMPANY AND  
9 WHAT IT WAS; CORRECT?

10 A CORRECT.

11 Q AND PEOPLE WHO WORK ON CREATIVE PROJECTS, A FILM,  
12 A TELEVISION SHOW, ARE THEY -- THE TALENT ITSELF, IS IT  
13 MORE USUAL THAN NOT TO BE AN INDEPENDENT CONTRACTOR?

14 A YEAH, IN ALMOST MOST CASES. ALMOST ALL CASES, I  
15 SHOULD SAY.

16 Q SO THE HUNDRED PEOPLE THAT YOU ESTIMATE WERE  
17 WORKING AT ALL OF MR. DAVID'S COMPANIES IN 2016, DO YOU  
18 KNOW HOW MANY OF THOSE WERE EMPLOYEES WITH EMPLOYMENT  
19 AGREEMENTS WORKING UNDER LOAN-OUT AGREEMENTS OR JUST  
20 INDEPENDENT CONTRACTORS?

21 A NO, I WOULDN'T. I DID NOT WORK IN  
22 ADMINISTRATION, SO I DON'T KNOW THAT.

23 Q AND FOLLOWING THAT, DO YOU KNOW WHETHER MS.  
24 REEVES WAS AN EMPLOYEE WITH AN EMPLOYMENT CONTRACT OR AN  
25 INDEPENDENT CONTRACTOR?

26 A I DO NOT, BUT BASED ON THE WORK SCHEDULE THAT I  
27 OBSERVED AND THE JOB ROLE THAT I FELT THAT SHE WAS IN  
28 BASED UPON OBSERVING THOSE THINGS, IT WOULD SEEM TO BE

1 MOST LIKELY AN INDEPENDENT CONTRACTOR FROM MY --

2 Q OKAY. AND WHEN YOU SAY BASED ON THE WORK  
3 SCHEDULE THAT YOU OBSERVED, TELL US WHAT YOU MEAN BY  
4 THAT.

5 A SHE WAS NOT THERE REGULARLY, CAME AND WENT AS SHE  
6 PLEASED, AND THERE WAS VERY -- I DIDN'T SEE HER MORE  
7 THAN ABOUT A HALF A DOZEN TIMES IN TOTAL, SO I WOULDN'T  
8 THINK A FULL-TIME EMPLOYEE WOULD HAVE THAT TYPE OF  
9 SCHEDULE AND LEEWAY.

10 Q DID MR. DAVID EVER COMPLAIN TO YOU ABOUT MS.  
11 REEVES' PERFORMANCE?

12 MR. GOLDBERG: OBJECTION. THAT'S BEYOND THE  
13 SCOPE OF THE CROSS, YOUR HONOR.

14 HON. T.A. GREEN: OVERRULED. YOU MAY REOPEN YOUR  
15 CROSS.

16 THE WITNESS: NOT THAT I CAN REMEMBER. I -- I --  
17 CAN I JUST CHECK THAT. I DO REMEMBER ONE TIME HE WAS  
18 LOOKING FOR HER WHEN SHE WASN'T THERE AND WONDERED WHY  
19 AND I THINK HIM AND MR. NUSSBAUM DISCUSSED THAT, BUT I  
20 WASN'T INVOLVED.

21 MS. GAROFALO: OKAY. I HAVE NO FURTHER  
22 QUESTIONS.

23 THANK YOU, MR. WEISMAN.

24 MR. GOLDBERG: NOTHING FURTHER, YOUR HONOR.  
25 NOTHING FURTHER.

26 HON. T.A. GREEN: ALL RIGHT. THANK YOU, SIR.  
27 YOU'RE EXCUSED.

28 ALL RIGHT. DEFENSE.

1 CASE NUMBER: BC643099  
2 CASE NAME: REEVES VS. HOLOGRAM USA, INC.  
3 LOS ANGELES, CALIFORNIA FRIDAY, OCTOBER 4, 2019  
4 DEPARTMENT 14 HON. TERRY A. GREEN, JUDGE  
5 APPEARANCES: (AS HERETOFORE NOTED.)  
6 REPORTER: JEANESE JOHNSON, CSR 11635  
7 TIME: 9:20  
8

9 --o0o--

10  
11 HON. T.A. GREEN: OKAY. JURY IS NOT PRESENT.  
12 COUNSEL IS PRESENT.

13 HAVE THEY BUZZED YET?

14 THE COURT REPORTER: I DON'T THINK SO, YOUR  
15 HONOR.

16 HON. T.A. GREEN: OKAY. WE'RE READY. OKAY. SO  
17 THERE'S BEEN A SLIGHT CHANGE IN PLANS. I HAVE TO LEAVE  
18 AT 3:15, SO YOU'LL HAVE FROM 1:30 UNTIL 3:15 TO DO THE  
19 WITNESS.

20 MR. GOLDBERG: WE HAVE DR. MEYER AT 1:30. I  
21 DON'T KNOW WHETHER THEY CAN FINISH HER OR NOT IN 45  
22 MINUTES OR NOT -- I DON'T KNOW.

23 HON. T.A. GREEN: THAT'S ACTUALLY A LONG TIME.

24 MS. GAROFALO: THERE'S A LOT TO COVER, YOUR  
25 HONOR.

26 BUT BEFORE WE START, WE DO HAVE TWO ISSUES.

27 HON. T.A. GREEN: OKAY.

28 MS. GAROFALO: THE FIRST BEING THE INCIDENT

1           HERE?

2           MS. GAROFALO: I DON'T KNOW.

3           HON. T.A. GREEN: ALL RIGHT. LET'S KEEP THIS  
4           SHORT. WE'LL RECONVENE AT 11:15. OKAY.

5           MR. GOLDBERG: THANK YOU, YOUR HONOR.

6           (RECESS)

7           HON. T.A. GREEN: ALL RIGHT. LET'S BRING THE  
8           JURY IN, PLEASE.

9           MS. GAROFALO: YOUR HONOR, MS. BOTTO IS HERE.

10          HON. T.A. GREEN: OKAY. ON THE RECORD, THE JURY  
11          IS PRESENT. COUNSEL IS PRESENT.

12          PLAINTIFF, DO YOU HAVE A WITNESS YOU WANT TO  
13          CALL?

14          MR. GOLDBERG: NO, I'M FINE.

15          HON. T.A. GREEN: YOU KNOW, LIKE I SAID, WHEN IT  
16          COMES TIME TO SIGN THE JUDGMENT, I PROMISE I'LL KNOW WHO  
17          YOU ARE.

18          OKAY. DEFENSE.

19          MS. GAROFALO: YES, YOUR HONOR. WE WOULD LIKE TO  
20          INTERRUPT MR. DAVID'S TESTIMONY TO CALL A WITNESS, ALLI  
21          BOTTO.

22          HON. T.A. GREEN: OKAY.

23          MA'AM, PLEASE STAND RIGHT HERE AND MR. CLERK WILL  
24          SWEAR YOU IN.

25          THE CLERK: PLEASE RAISE YOUR RIGHT HAND.

26          DO YOU SOLEMNLY STATE THAT THE TESTIMONY YOU'RE  
27          ABOUT TO GIVE IN THE CAUSE NOW PENDING BEFORE THIS COURT  
28          SHALL BE THE TRUTH, THE WHOLE TRUTH AND NOTHING BUT THE

1 TRUTH SO HELP YOU GOD?

2 THE WITNESS: YES.

3 THE CLERK: THANK YOU. YOU MAY HAVE A SEAT.

4 MA'AM, WILL YOU PLEASE SAY AND SPELL YOUR NAME  
5 FOR THE RECORD.

6 THE WITNESS: MY NAME IS ALLISON JOHNSON,  
7 A-L-L-I-S-O-N J-O-H-N-S-O-N.

8 THE CLERK: THANK YOU.

9 HON. T.A. GREEN: WELCOME. PLEASE PROCEED.

10 MS. GAROFALO: OKAY.

11

12 DIRECT EXAMINATION

13 MS. GAROFALO:

14 Q GOOD MORNING.

15 IS IT MS. JOHNSON OR MS. BOTTO?

16 A BOTTO IS MY MAIDEN NAME, SO IT'S JOHNSON.

17 Q DO YOU GO BY MS. JOHNSON NOW?

18 A YES.

19 Q THANK YOU FOR BEING HERE.

20 AS YOU MAY KNOW, I REPRESENT MR. DAVID AND SOME  
21 OF HIS COMPANIES IN THIS LAWSUIT.

22 DO YOU KNOW ALKI DAVID?

23 A YEAH, I WORKED FOR HIM FOR FIVE YEARS.

24 Q OKAY. DID YOU WORK FOR A PARTICULAR COMPANY?

25 A I STARTED WITH FILMON AND THEN I WORKED WITH  
26 HOLOGRAM USA.

27 Q AND IF YOU RECALL, WHAT YEARS DID YOU WORK AT  
28 FILMON?

1           A 2012, AND I STILL DID WORK WHEN I WORKED AT  
2 HOLOGRAM USA FOR FILMON, SO UNTIL HE CLOSED THE COMPANY  
3 IN, LIKE, 2017 IN AUGUST.

4           Q OKAY. SO IF I UNDERSTAND YOU, YOU WERE EMPLOYED  
5 BY FILMON, BUT AT SOME POINT, YOU WERE PROVIDING  
6 SERVICES OR WORKING ON THE HOLOGRAM SIDE?

7           A YES.

8           Q IS THAT RIGHT?

9           ALL RIGHT. WHILE YOU WERE WORKING AT FILMON,  
10 WHAT WAS YOUR POSITION?

11          A SO I STARTED OUT -- WHEN WE WERE DOING LIVE  
12 TELEVISION, I WORKED FOR A GIRL WHO WAS ALKI'S ASSISTANT  
13 AND THEN SHE QUIT, AND SO ALKI WAS, LIKE, YOU CAN HAVE  
14 HER JOB PRETTY MUCH BY MANAGING THE TELEVISION STUDIO WE  
15 HAD DOWNSTAIRS.

16          AND I HELPED PRODUCE SHOWS, SET SCHEDULES, DID  
17 ALL THAT KIND OF STUFF. AND THEN ONE DAY, WE SWITCHED  
18 OVER TO HOLOGRAM TECHNOLOGY, SO FOR THAT COMPANY, I DID  
19 -- I WOULD WORK ON THE OPERATIONS TEAM AND I WOULD  
20 TRAVEL AROUND AND BUILD HOLOGRAM STAGES AND THEN I WOULD  
21 ALSO WORK IN SALES.

22          Q OKAY. AND DO YOU REMEMBER OR CAN YOU ESTIMATE  
23 WHEN YOU STARTED TO PROVIDE SERVICES TO HOLOGRAM RATHER  
24 THAN FILMON?

25          A WELL, I STARTED DOING HOLOGRAM, BUT THE DAY WE  
26 STARTED THE COMPANY, I HELPED KNOCK DOWN A WALL TO HELP  
27 MOVE IT INTO AND INSTALL OUR FIRST STAGE.

28          Q OKAY. AND WHEN ABOUT WAS THAT?

1 A 2014 OR EARLY 2015.

2 Q OKAY. AND WHEN YOU WERE AT FILMON, CAN -- YOU  
3 SAID YOU HELPED PRODUCE SHOWS; IS THAT RIGHT?

4 A UM-HMM.

5 Q CAN YOU TELL ME WHAT SHOWS YOU CAN RECALL THAT  
6 YOU ASSISTED IN IN CONNECTION WITH?

7 A I WORKED ON JANICE DICKINSON'S SHOW, I WORKED ON  
8 A SHOW WITH KATO KAELIN.

9 Q I'M SORRY. SPEAK A LITTLE BIT LOUDER, I'M NOT  
10 SURE IF THAT MIC IS WORKING, BUT IF YOU COULD SPEAK JUST  
11 A LITTLE BIT LOUDER.

12 A I WORKED WITH JANICE DICKINSON AND KATO KAELIN  
13 AND THEN PRETTY MUCH ALL THE SHOWS I HELPED SCHEDULE AND  
14 GET PEOPLE ON STAGE, BOOKED PEOPLE THAT WOULD COME ON TO  
15 THEIR SHOWS, LIKE, GUESTS OF THEIR SHOWS AS WELL.

16 Q OKAY. DID YOU WORK ON BEVERLY HILLS LIVE?

17 A I WAS THERE ON SET, PLUS I HELPED MANAGE THE  
18 STUDIO, BUT I DIDN'T -- I DIDN'T, LIKE, PRODUCE OR DO  
19 ANYTHING ON THAT SHOW.

20 Q AND WHAT ABOUT THE ORIGINAL BATTLECAM?

21 A OH, YEAH, I DID LOTS WITH BATTLECAM.

22 Q OKAY. AND WHAT SERVICES DID YOU PROVIDE FOR  
23 BATTLECAM?

24 A I WOULD HOST SHOWS, I WAS ON CAMERA, I WOULD -- I  
25 ACTUALLY, LIKE, KNEW ALL THE BATTLECAMERS PRETTY WELL, I  
26 SOMEHOW BECAME LIKE A RING LEADER OF THE PEOPLE ON THIS  
27 THING, SO I WORKED VERY -- A LOT ON IT.

28 Q DID YOU ENJOY WORKING ON BATTLECAM?

1           A OH, IT WAS SO MUCH FUN, IT WAS LIKE WORKING ON  
2 JACKASS IS THE BEST WAY TO DESCRIBE IT.

3           Q AND THERE WAS A SECOND INCARNATION OR A SECOND  
4 ROUND OF BATTLECAM.

5 ARE YOU AWARE OF THAT?

6           A UM-HMM.

7           Q AND DID YOU WORK ON THOSE SHOWS AS WELL?

8           A UM-HMM. I HOSTED A SHOW ON IT.

9           Q YOU WHAT?

10          A I HOSTED A SHOW.

11          Q AND DO YOU KNOW LAUREN REEVES?

12          A UM-HMM.

13                 HON. T.A. GREEN: IS THAT A "YES"?

14                 THE WITNESS: YES.

15 MS. GAROFALO:

16          Q HOW DO YOU KNOW MS. REEVES?

17          A SHE CAME TO WORK FOR THE COMPANY TWO SEPARATE  
18 TIMES.

19          Q DID -- WAS MS. REEVES ALSO A HOST ON THE SECOND  
20 BATTLECAM?

21          A I BELIEVE SO. I THINK SHE WAS HIRED TO WRITE AND  
22 THEN ALL OF A SUDDEN WAS ON CAMERA BECAUSE I KNOW SOME  
23 PEOPLE THAT WORKED IN IT WERE A LITTLE BIT WEIRD ABOUT  
24 THAT ALL OF A SUDDEN SHE WANTED TO BE ON CAMERA WHEN SHE  
25 WAS HIRED TO WRITE FOR IT.

26          Q SO YOU JUST TOLD US THAT MS. REEVES WORKED DURING  
27 TWO SEPARATE PERIODS --

28          A UM-HMM.

1 Q -- AT MR. DAVID'S COMPANIES?

2 A YES.

3 Q WHEN WAS -- IF YOU RECALL, WHEN WAS THE FIRST  
4 TIME THAT MS. REEVES WAS HIRED TO PERFORM SERVICES FOR  
5 MR. DAVID'S COMPANIES?

6 A I 2014, I BELIEVE, WAS WHEN WE DID THE BEVERLY  
7 HILLS LIVE AND SHE CAME TO BE A WRITER ON THAT AND THEN  
8 I DON'T KNOW IF SHE QUIT OR GOT FIRED. AND THEN SHE  
9 CAME BACK A SECOND TIME WHEN HE STARTED THE SHOWS AGAIN  
10 TO WRITE AND SHE WAS GOING TO DO SOME, LIKE, HOLOGRAM  
11 ROASTS THAT NEVER HAPPENED.

12 Q CAN WE LOOK AT EXHIBIT 127, WHICH HAS BEEN  
13 ADMITTED.

14 AND I'M GOING TO SHOW YOU A DOCUMENT. I'M GOING  
15 TO SHOW YOU SOMETHING THAT'S NEXT TO YOU ON THE SCREEN.

16 A YEP.

17 Q THIS IS EXHIBIT 127.

18 DO YOU RECOGNIZE EXHIBIT 127?

19 A YEAH, I DO.

20 Q WHAT IS IT?

21 A IT WAS A SIGN THAT WAS HANGING IN MY OFFICE.  
22 THAT WAS A JOKE WITH ONE OF THE GIRLS THAT RAN THE --  
23 THIS -- ONE THE MACHINES DOWNSTAIRS IN THE STUDIO. THIS  
24 GIRL USED TO LAUGH -- LIKE WE HAD HR, LIKE YELENA WAS  
25 OUR -- EVERYBODY WOULD GO TO HER FOR OUR HR NEEDS  
26 BECAUSE EVERYBODY WAS ALWAYS COMPLAINING THAT WE DIDN'T  
27 HAVE AN HR. SO JANELLE AND I WERE WAS LIKE, OH, WE'LL  
28 BE IT AND SINCE EVERYBODY WAS ALWAYS COMPLAINING ABOUT

1 HARASSMENT THAT WE JUST MADE A JOKE AND PEOPLE TOOK IT  
2 SERIOUSLY, I GUESS.

3 Q OKAY. SO LET ME START HERE.

4 IS THIS SOMETHING YOU CREATED OR DID YOU --

5 A YEAH, IT WAS LIKE A JOKE -- THAT WE PULLED AN  
6 IMAGE OFF OF GOOGLE SEARCH.

7 Q OVER A GOOGLE SEARCH?

8 A YEAH.

9 Q HOW MUCH OF WHAT WE'RE SEEING ON THE SCREEN CAME  
10 FROM THE GOOGLE SEARCH?

11 A THE PICTURE.

12 Q AND HOW ABOUT THE WORDS "HER-ASS"?

13 A HER-ASS, YEAH, BECAUSE -- FOR HARASSMENT. SHOULD  
14 WE -- JUST -- IT WAS -- HONESTLY A JOKE AND WE PUT IT IN  
15 MY OFFICE, THE WHOLE --

16 Q OKAY. HOLD. HANG ON, I'LL GET THERE.

17 A YEAH.

18 Q ALL RIGHT. SO HER-ASS PART?

19 A UM-HMM.

20 Q AND THEN, I CAN'T. CAN YOU MAKE IT A DROP  
21 BIGGER, "WE WILL."

22 A "GIVE YOU JUST THE TIP."

23 Q "GIVE YOU JUST THE TIP."

24 AND THE PHOTOGRAPH, DID THAT ALL COME FROM GOOGLE?

25 A YEAH.

26 Q ALL RIGHT. IF YOU COULD GO -- THERE WE GO.

27 AND WHERE IT SAYS, "HR HEADQUARTERS," WAS THAT  
28 ALSO ON WHATEVER YOU TOOK FROM GOOGLE?

1           A WELL, I JUST CAN TYPE -- I TYPED THAT OUT WITH MY  
2 FINGERS ON THE COMPUTER.

3           Q OKAY. AND OBVIOUSLY YOU PUT THE NAME ALLI BOTTO  
4 IN?

5           A YEAH.

6           Q AND WHO IS --

7           A JANELLE BOWER.

8           Q YES.

9           A UM-HMM.

10          Q WHO IS THE JANELLE BOWER?

11          A SHE RAN THE TRICAST MACHINE WITH ALL THE HOLOGRAM  
12 SHOWS.

13          Q AND WAS SHE THE WOMAN WHO WAS INVOLVED WITH YOU?

14          A YEAH, WE WORKED VERY CLOSELY TOGETHER.

15                 MR. GOLDBERG: I'M SORRY, YOUR HONOR, I DON'T  
16 THINK THE QUESTION WAS FINISHED. CAN WE --

17                 HON. T.A. GREEN: YEAH. OKAY. YEAH, WE HAVE TO  
18 HAVE THE QUESTION, PAUSE/ANSWER, PAUSE.  
19 YOUR TURN.

20                 MS. GAROFALO:

21                 Q IS MS. BOWER THE WOMAN YOU DESCRIBED WHO WORKED  
22 WITH YOU ON CREATING THIS AND PUTTING IN IT IN YOUR  
23 OFFICE?

24                 A YES.

25                 Q OKAY. DO YOU KNOW WHEN APPROXIMATELY WHAT YEAR  
26 THIS WAS -- DID YOU HANG IT UP, BY THE WAY?

27                 A UM-HMM.

28                 HON. T.A. GREEN: IS THAT A "YES"?

1 THE WITNESS: YES.

2 2014, I THINK SO.

3 MS. GAROFALO:

4 Q AND DID MR. DAVID TELL YOU -- STRIKE THAT.

5 DID MR. DAVID PROVIDE ANYTHING ON THIS, I'LL CALL  
6 IT A POSTER, ANY OF THE CONTENTS?

7 A NO.

8 Q DID MR. DAVID INSTRUCT YOU TO HANG IT UP?

9 A NO.

10 Q DID YOU SEEK MR. DAVID'S CONSENT BEFORE YOU PUT  
11 THIS IN YOUR OFFICE?

12 A NO.

13 Q DID YOU EVER HAVE ANY CON- -- STRIKE THAT.

14 DID MR. DAVID EVER ASK YOU ABOUT THIS POSTER?

15 A NO.

16 Q DO YOU KNOW WHETHER MR. DAVID EVER SAW THE  
17 POSTER?

18 A NO.

19 Q DID YOU HAVE AN OFFICE OR A CUBICLE?

20 A I HAD AN OFFICE, BUT IT WAS A VERY -- MY FIRST  
21 OFFICE WAS, LIKE, A VERY SMALL OFFICE RIGHT OUTSIDE  
22 ALKI'S.

23 Q OKAY. AND THAT'S WHERE THIS WAS HANGING IN THAT  
24 SMALL OFFICE?

25 A UM-HMM.

26 Q AND DO YOU RECALL ANY INCIDENT WHERE MR. DAVID  
27 CAME IN AND SAID SOMETHING THAT WOULD LEAD YOU TO  
28 BELIEVE HE NOTICED THIS POSTER?

1 A NO.

2 Q HOW LONG WAS THE POSTER HANGING IN THE OFFICE?

3 A LIKE, A WEEK MAYBE.

4 Q AND DID ANYBODY AT ALL AT THE COMPANY SAY  
5 ANYTHING TO YOU OF THE NATURE, THAT'S OFFENSIVE, TAKE IT  
6 DOWN?

7 A NO.

8 Q DID ANYBODY, ON THE OTHER HAND, EVER WALK IN AND  
9 SAY THAT'S REALLY FUNNY OR SOMETHING SIMILAR?

10 A YEAH.

11 Q AND HOW MANY PEOPLE DO YOU THINK SAW THIS POSTER  
12 IN THE WEEK THAT IT WAS UP WHO COMMENTED THAT IT WAS  
13 FUNNY, IF YOU CAN RECALL?

14 A SIX PEOPLE. I...

15 Q AND YOU DON'T RECALL A SINGLE PERSON OBJECTING?

16 A NO. AND I ACTUALLY REMEMBER SOME GIRLS THAT NOW  
17 ARE USING IT IN THEIR CASES AGAINST MR. DAVID, COMING IN  
18 AND SAYING THAT IT WAS FUNNY, AND SO OBVIOUSLY, THEY  
19 WERE IN THERE TAKING A PHOTO.

20 Q DO YOU KNOW WHETHER OR NOT MS. REEVES EVER SAW  
21 EXHIBIT 127 WHEN IT WAS HANGING IN YOUR OFFICE?

22 A I'M NOT SURE. I DIDN'T REALLY ASSOCIATE MYSELF  
23 WITH HER.

24 Q AFTER THEY TOOK THE PHOTO WHY DID YOU TAKE THE  
25 POSTER DOWN?

26 A BECAUSE I ALWAYS CHANGE THE THINGS THAT WERE  
27 HANGING IN MY OFFICE.

28 Q YOU HUNG OTHER THINGS OF A COMEDIC NATURE IN YOUR

1 OFFICE?

2 A I HAD DRAWINGS OF MY HAIRLESS CAT THAT WOULD WALK  
3 AROUND THE OFFICE, I HAD A MAN WITH A MUSTACHE THAT SAT  
4 RIGHT BEHIND ME OF A RANDOM PERSON, I HAD NO IDEA WHO IT  
5 WAS.

6 Q OKAY. WE CAN TAKE THAT EXHIBIT DOWN,  
7 EXHIBIT 127.

8 NOW, YOU -- I THINK -- WELL, LET ME ASK IT THIS  
9 WAY. DID YOU LEAVE THE EMPLOY OF MR. DAVID'S COMPANIES  
10 FILMON, IN PARTICULAR, VOLUNTARILY?

11 A NO, HE SHUT DOWN THE COMPANY, HE LET EVERYBODY GO  
12 WHEN I WAS ABOUT EIGHT MONTHS PREGNANT.

13 Q OKAY. AND WHEN YOU SAY, "HE SHUT DOWN THE  
14 COMPANY" --

15 A UM-HMM.

16 Q -- WHAT COMPANY ARE YOU TALKING ABOUT?

17 A HOLOGRAM USA. HE BASICALLY LET EVERYBODY GO IN  
18 THE COMPANY BESIDES A COUPLE OF PEOPLE.

19 Q HOLD ON.

20 I -- IF YOU CAN REPEAT THAT BECAUSE I COULDN'T  
21 HEAR YOU.

22 A HE LET GO OF PRETTY MUCH EVERYBODY IN THE  
23 COMPANY, MAYBE NOT, LIKE, FOUR PEOPLE.

24 Q AND IS -- AT THAT POINT IN TIME, WHICH I BELIEVE  
25 YOU TOLD US WAS 2017; CORRECT?

26 A AUGUST OF 2017, YEAH.

27 Q WAS FILMON STILL FUNCTIONING AT THAT TIME, IF YOU  
28 KNOW?

1 A YEAH, IT WAS STILL RUNNING.

2 Q OKAY. WAS ONLY HOLOGRAM SHUT DOWN?

3 A I BELIEVE -- EVERYBODY THAT WAS LET GO EVEN FROM  
4 FILMON.

5 Q AND THAT WAS IN AUGUST OF 2017 --

6 A UM-HMM.

7 Q -- CORRECT?

8 DO YOU KNOW HOW MANY PEOPLE WERE TERMINATED  
9 BECAUSE THE COMPANY SHUT DOWN IN AUGUST OF 2017?

10 A PROBABLY AROUND 40.

11 Q AND AT THAT TIME, HOW LONG HAD YOU BEEN AT THE  
12 COMPANY?

13 A IT WAS JUST BEING FIVE YEARS.

14 Q WHAT WAS YOUR REACTION TO THE COMPANY BEING SHUT  
15 DOWN?

16 A I MEAN, OBVIOUSLY, I WAS HEARTBROKEN BECAUSE IT  
17 WAS THE BEST JOB I HAD EVER HAD IN MY LIFE AND I SAID I  
18 WOULD WORK FOR ALKI UNTIL, LIKE, THE DAY I DIED. THERE  
19 WAS NO WAY I WOULD EVER GET ANOTHER JOB. AND I WAS  
20 EIGHT MONTHS PREGNANT AT THE TIME AND I LEFT WITH, YOU  
21 KNOW, NO HEALTH INSURANCE, LET'S FIGURE IT OUT, SO IT  
22 WAS A ROUGH TIME, I WOULD SAY.

23 Q WHAT WAS IT ABOUT THE JOB THAT MADE IT THE BEST  
24 JOB YOU EVER HAD?

25 A WE HAD -- WE -- AS LONG AS WE GOT OUR STUFF DONE,  
26 ALKI DIDN'T HOVER OVER US AND BE, LIKE, WHAT ARE YOU  
27 WORKING ON, WHAT ARE YOU DOING, WHAT'S GOING ON? AS  
28 LONG AS YOU SHOWED UP, YOU DID YOUR WORK, YOU HAD A JOB

1 AND IT WAS LAID BACK. I DIDN'T -- I COULD COME IN WITH  
2 MY PAJAMAS IF I WANTED TO, WHICH I DID.

3 Q AND DURING THE FIVE YEARS THAT YOU WERE AT FILMON  
4 AND HOLOGRAM, DID YOU WITNESS MR. DAVID DOING ANYTHING  
5 TO ANYONE THAT CAUSED YOU ALARM?

6 A NO.

7 Q AND DURING THE FIVE YEARS THAT YOU WERE WITH  
8 FILMON AND HOLOGRAM, DID YOU SEE MR. DAVID -- STRIKE  
9 THAT.

10 DID YOU HEAR MR. DAVID SAY ANYTHING TO ANYONE AT  
11 THE COMPANY THAT CAUSED YOU TO BE UPSET OR CONCERNED?

12 A NEVER.

13 Q DURING THE FIVE YEARS THAT YOU WERE IN THE  
14 COMPANY, WERE YOU EVER SEXUALLY HARASSED BY MR. DAVID?

15 A NEVER. I MADE HIM THE GODFATHER OF MY CHILD. I  
16 DOUBT I WOULD MAKE SOME SEXUAL PREDATOR THE GODFATHER OF  
17 MY KID.

18 Q NOW, LET'S TALK ABOUT MS. REEVES.

19 HOW MUCH, IF ANY, INTERACTION DID YOU HAVE WITH  
20 MS. REEVES AT EITHER POINT IN HER ASSOCIATIONS WITH MR.  
21 DAVID'S COMPANIES?

22 A SHE WOULD SIT IN THE GUY'S OFFICE THAT I WORKED  
23 NEXT TO MOST OF THE DAY AND I WORKED CLOSELY WITH HIM,  
24 SO I WOULD SEE HIM SITTING THERE. I MEAN, SHE WOULD  
25 SHOW UP AND SHE WOULD SIT THERE AND DO STUFF. I -- I  
26 DID NOT KNOW WHAT SHE WAS DOING. I DIDN'T REALLY PAY  
27 ATTENTION, NEVER SAW ANYTHING COME OF WHAT SHE WAS DOING  
28 OR GETTING PAID TO DO, SO.

1 Q AND WHO WAS THE GUY WHOSE OFFICE SHE SAT IN?

2 A DAVID NUSSBAUM.

3 Q DID YOU EVER WORK WITH MS. REEVES?

4 A SHE WROTE FOR SOME OF THE SHOWS THAT -- WHICH  
5 WERE IN, LIKE, THE STUDIO THAT I WAS MANAGING AND THEN  
6 DID SOMETHING OUTSIDE ON A BALCONY, BUT NEVER, LIKE, ON  
7 CAMERA TOGETHER THAT I CAN REMEMBER.

8 Q DID YOU EVER HEAR MS. REEVES COMPLAIN ABOUT  
9 ANYTHING THAT MR. DAVID DID EITHER TIME SHE WAS  
10 EMPLOYED?

11 A NO.

12 Q DID YOU EVER WITNESS MR. DAVID TOUCH MS. REEVES  
13 IN ANY WAY THAT YOU FELT WAS INAPPROPRIATE?

14 A NO.

15 Q DID YOU EVER WITNESS MR. DAVID TOUCH MS. REEVES?

16 A NO.

17 Q DID YOU EVER SEE SOMETHING IN THE OFFICE CALLED  
18 THE MAN-GINA?

19 A I THINK EVERYBODY HAS SEEN A MAN-GINA, YES, I  
20 HAVE.

21 Q OKAY. AND HOW MANY TIMES WAS MR. DAVID  
22 DEMONSTRATING THE MAN-GINA?

23 A WE HAD A HOLOGRAM OF HIM DOING IT, SO HALF THE  
24 TIME IT WAS AN IMAGE OF A HOLOGRAM.

25 Q HOW WOULD YOU SEE THE IMAGE OF THE HOLOGRAM, IN  
26 THE STUDIO OR IN THE OFFICE?

27 A IN THE STUDIO, WHICH WAS RIGHT DOWNSTAIRS BELOW  
28 OUR OFFICES.

1 Q AND DID YOU FIND IT OFFENSIVE IN ANY WAY?

2 A NO. NO, I FOUND IT FUNNY.

3 Q HAD -- DID YOU EVER -- DID ANYBODY EVER COMPLAIN  
4 TO YOU THAT MR. DAVID'S DEMONSTRATION OF THE MAN-GINA  
5 OFFENDED THEM IN ANY WAY?

6 A NO.

7 Q FROM YOUR OWN OBSERVATION, WHAT WAS THE GENERAL  
8 REACTION IN THE OFFICE WHEN MR. DAVID SHOWED HIS  
9 MAN-GINA?

10 A "THAT'S ALKI." NOBODY WAS EVER OFFENDED REALLY.  
11 EVERYBODY THOUGHT IT WAS FUNNY AND HILARIOUS WHILE THEY  
12 WERE WORKING THERE UNTIL THEY GOT FIRED AND THEN  
13 SUDDENLY SOME THINGS BECOME A PROBLEM.

14 Q DO YOU KNOW FROM YOUR OWN FIRSTHAND EXPERIENCE  
15 WHY MR. DAVID ELECTED TO SHUT DOWN THE COMPANIES IN  
16 AUGUST OF 2000--

17 MR. GOLDBERG: OBJECTION. OBJECTION. IT CALLS  
18 FOR HEARSAY, YOUR HONOR, SHE WOULD HAVE NO BASIS OTHER  
19 THAN WHAT --

20 HON. T.A. GREEN: PROBABLY TRUE, PROBABLY TRUE.

21 YOU CAN LAY A FOUNDATION, IF YOU WANT, BUT I  
22 THINK MR. GOLDBERG IS RIGHT.

23 MS. GAROFALO:

24 Q WERE YOU AT ALL INVOLVED IN THE DECISION TO SHUT  
25 DOWN THE COMPANY?

26 A NO.

27 HON. T.A. GREEN: ALL RIGHT. SUSTAINED.

28 ///

1 MS. GAROFALO:

2 Q NOW, DID YOU EVER SEE MR. DAVID TAKE HIS BELT OFF  
3 IN THE OFFICE AND SLAM THE TABLE?

4 A NO.

5 Q DID YOU EVER SEE MR. DAVID PUT HIS HANDS ON  
6 ANYBODY'S NECK OR THROAT AND SAY, "LOOK INTO MY EYES"?

7 A NO, DEFINITELY NOT.

8 Q OKAY. HOW WOULD YOU DESCRIBE MR. DAVID'S SENSE  
9 OF HUMOR?

10 A HE'S OUT THERE AND KIND OF SAYS WHATEVER ON HIS  
11 MIND AND HE KIND OF SAYS THE THINGS THAT EVERYBODY IS  
12 THINKING BUT IS TOO AFRAID TO ACTUALLY SAY.

13 Q HOW WOULD YOU DESCRIBE THE CONTENT OF BATTLECAM,  
14 THE ORIGINAL BATTLECAM?

15 A I WOULD DESCRIBE IT AS JACKASS, BUT ALL FROM  
16 PEOPLE'S HOMES.

17 Q WHAT DOES THAT MEAN?

18 A IF ANYBODY WATCHES MTV'S JACKASS, THEY KNOW. I  
19 DON'T KNOW. IF I KNEW THAT I WAS GOING TO GO WORK FOR  
20 JOHNNY KNOXVILLE, I WOULDN'T EXPECT TO BE WALKING INTO A  
21 BUTTONED UP, COLLARED T-SHIRT LIKE WEARING A SUIT TO  
22 WORK KIND OF PLACE, AND THAT'S NOT THE PLACE WE WERE AT.  
23 WE WERE NOT WORKING WHERE YOU HAD TO WEAR A SUIT FOR A  
24 OUTFIT OR WEAR, LIKE, A DRESS OR ANYTHING. YOU COULD  
25 SHOW UP HOWEVER YOU WANTED, AND BATTLECAM WAS CRAZY,  
26 JUST PEOPLE LOCKED IN THEIR PARENTS' BASEMENTS COMING UP  
27 FROM ACROSS THE COUNTRY.

28 Q BUT THOSE OF US WHO DON'T KNOW THE SHOW THAT

1 YOU'RE TALKING ABOUT, CAN YOU TELL US WHY YOU'RE  
2 COMPARING IT TO BATTLECAM?

3 A WHY I'M COMPARING JACKASS?

4 Q YES.

5 A BECAUSE IT'S A BUNCH OF PEOPLE JUST DOING CRAZY  
6 STUNTS AND STUFF THAT NORMAL PEOPLE DON'T DO. AND ALKI  
7 FOUND PEOPLE THAT WOULD DO CRAZY STUFF AND -- IN THE  
8 BEGINNING, I KNOW HE WOULD PAY THEM WHEN THEY WERE ON  
9 CAMERA TO DO PRANKS THAT HE ASKED THEM TO DO AND THEY  
10 SAID, YEAH, I'LL TACK IT TO MY FOREHEAD.

11 Q OKAY. AND JACKASS IS ON MTV; CORRECT?

12 A UM-HMM.

13 HON. T.A. GREEN: IS THAT A "YES"?

14 THE WITNESS: YES. SORRY.

15 MS. GAROFALO:

16 Q OKAY. WOULD IT BE POSSIBLE FOR SOMEBODY TO --  
17 STRIKE THAT.

18 WORKING AT -- HOW LONG DID IT TAKE YOU AFTER YOU  
19 BEGAN WORKING WITH MR. DAVID TO FIGURE OUT WHAT KIND OF  
20 ENVIRONMENT YOU WERE WORKING IN?

21 A DAY ONE. AND HE WASN'T EVEN THERE FOR THE FIRST  
22 THREE MONTHS THAT I WORKED THERE.

23 Q SO EVEN WHEN MR. DAVID WASN'T IN THE OFFICE, THE  
24 ENVIRONMENT WAS NOT YOUR TYPICAL CORPORATE OFFICE; IS  
25 THAT CORRECT?

26 A YES.

27 MS. GAROFALO: OKAY. I HAVE NO FURTHER  
28 QUESTIONS.

1 HON. T.A. GREEN: CROSS.

2

3

CROSS EXAMINATION

4

MR. GOLDBERG:

5

Q WHEN YOU WENT TO WORK THERE, WERE YOU WORKING ON  
6 BATTLECAM?

7

A YES.

8

Q SO YOU WORKED THERE ON BATTLECAM FROM DAY ONE;  
9 CORRECT?

10

A CORRECT.

11

Q WHEN MS. REEVES WENT TO WORK INITIALLY IN THE  
12 INITIAL PERIOD OF HER EMPLOYMENT, DO YOU KNOW WHAT SHE  
13 WAS WORKING ON?

14

A DO I KNOW WHAT SHE WAS WORKING ON?

15

Q YEAH.

16

A SHE WAS SUPPOSED TO BE A WRITER.

17

Q YEAH.

18

A BUT THESE SHOWS AREN'T SHOWS THAT YOU USUALLY  
19 WRITE FOR, SO I DON'T KNOW WHAT SHE DID.

20

Q DO YOU KNOW WHETHER SHE WAS WORKING ON BATTLECAM  
21 LIVE? I'M SORRY, ON BEVERLY HILLS LIVE DURING THAT  
22 INITIAL PERIOD?

23

A DID I KNOW HER, DID YOU SAY?

24

Q NO.

25

DID YOU KNOW THAT SHE WAS WORKING ON A SHOW  
26 CALLED BEVERLY HILLS LIVE?

27

A YES, I DID.

28

Q AND WERE YOU AWARE OF THE FACT THAT HER OFFICE

1 WAS ACROSS THE STREET INITIALLY WHEN SHE STARTED WORKING  
2 THERE?

3 A OKAY. NO, I DIDN'T -- I DIDN'T KNOW SHE EVEN HAD  
4 AN OFFICE. THERE WAS DESKS THERE TO SIT AT.

5 Q OKAY. NOW --

6 A I'M PRETTY SURE SHE WASN'T HANDED, LIKE, THE ONE  
7 BIG OFFICE IN THAT OFFICE ACROSS THE STREET.

8 Q NOW, YOU WERE -- THAT POSTER THAT WE LOOKED AT,  
9 DID YOU EVER HAVE AN OFFICE DOWNSTAIRS?

10 A I HAD AN OFFICE UPSTAIRS.

11 Q DID YOU EVER HAVE AN OFFICE DOWNSTAIRS?

12 A I HAD AN OFFICE UPSTAIRS.

13 Q OKAY. I JUST ASKED IF YOU EVER HAD AN OFFICE  
14 OTHER THAN UPSTAIRS.

15 A I WOULDN'T CALL IT AN OFFICE. I WOULD SAY I HAVE  
16 A DESK.

17 Q DOWNSTAIRS?

18 A CORRECT.

19 Q DURING WHAT PERIOD OF TIME?

20 A 2012 TO -- TILL WE GOT THE OFFICES UPSTAIRS IN  
21 2014, I BELIEVE, IT WAS OR '15.

22 Q OKAY. OKAY.

23 NOW, AFTER YOU TOOK THAT POSTER YOU TOLD US YOU  
24 TOOK DOWN, DID YOU KEEP IT AFTER YOU TOOK IT DOWN?

25 A I DON'T KNOW. MAYBE IN A FILING CABINET.

26 Q SO YOUR BEST TESTIMONY IS YOU TOOK IT DOWN IN  
27 2014; IS THAT RIGHT?

28 A SURE.

1 Q OKAY. NOW, WITH REGARD TO -- I WANT TO SHOW  
2 YOU --

3 A SIR, ARE YOU NOW TELLING ME THAT SHE WAS GOING  
4 AROUND IN MY DRAWERS?

5 Q EXCUSE ME. EXCUSE ME. EXCUSE ME.  
6 THERE'S NO QUESTION PENDING, YOUR HONOR.

7 HON. T.A. GREEN: RIGHT.

8 NEXT QUESTION.

9 MR. GOLDBERG:

10 Q NOW, I'D LIKE YOU TO TAKE A LOOK AT EXHIBIT 112,  
11 WHICH HAS ALREADY BEEN ADMITTED INTO EVIDENCE.  
12 AND IF WE CAN PUT IT UP ON THE SCREEN.  
13 YOU CAN SEE ON IT THE SCREEN IN FRONT OF YOU, IF THAT'S  
14 OKAY.

15 THIS IS A E-MAIL THAT WAS SENT OUT ON AUGUST 26,  
16 2016, REGARDING THE NEW SHOW BATTLECAM LIVE AND YOU'RE  
17 COPIED ON THE E-MAIL ON THE TOP.

18 DO YOU SEE THAT?

19 A I DO.

20 Q DO YOU RECALL RECEIVING THIS E-MAIL?

21 A DID I RECEIVE THIS E-MAIL?

22 Q YES.

23 A YEAH, AUGUST 26TH OF 2016.

24 Q RIGHT.

25 AND DO YOU RECALL THAT -- AT THE TIME THAT YOU  
26 RECEIVED THIS, DID YOU READ IT?

27 A POSSIBLY.

28 Q OKAY. WHAT WAS YOUR CONNECTION WITH THE SHOW

1 BATTLECAM LIVE?

2 A NOT TOO MUCH, I JUST MANAGED THE STUDIO.

3 Q WHAT DOES THAT MEAN EXACTLY?

4 A WHAT WAS WHAT?

5 Q WHAT DOES IT MEAN TO "MANAGE THE STUDIO"?

6 A I WAS ABLE TO LOCK AND UNLOCK THE DOORS. I MADE  
7 PEOPLE'S SCHEDULES THAT RAN ALL THE MACHINES THAT MADE  
8 THE SHOWS POSSIBLE.

9 Q AS I UNDERSTAND IT, THE SHOW WAS BEING FILMED ON  
10 THE BALCONY?

11 A THAT -- NO.

12 Q AND WHERE WAS IT BEING FILMED?

13 A OUT IN OUR STUDIO DOWNSTAIRS AND OUTSIDE ON THE  
14 STREET.

15 Q ON THE STUDIO DOWNSTAIRS WHERE?

16 A AND ALSO OUTSIDE ON THE STREET, THEY WOULD LIKE  
17 TO INVOLVE PEOPLE THAT WALKED BY.

18 Q SO YOUR RECOLLECTION IS BATTLECAM LIVE WAS NEVER  
19 BEING SHOT --

20 A ARE YOU TALKING ABOUT BATTLECAM LIVE OR BEVERLY  
21 HILLS LIVE BECAUSE YOU'RE TALKING ABOUT TWO DIFFERENT  
22 THINGS?

23 Q I'M TALKING ABOUT BATTLECAM LIVE.

24 A SO THE SECOND TIME THAT SHE WORKED FOR ALKI?

25 Q WELL, ACTUALLY, IT'S -- WELL, WE'LL GET INTO WHAT  
26 TIME IT WAS. I'M JUST ASKING BATTLECAM LIVE.

27 A SO BATTLECAM LIVE WAS ON THE BALCONY UPSTAIRS.

28 Q OKAY. THAT WAS MY QUESTION.

1           AND WHAT WAS YOUR RELATIONSHIP TO THAT SHOW, IF  
2 YOU COULD TELL ME?

3           A I HOSTED A SHOW ON IT.

4           Q OKAY. SO DO YOU RECALL HOW MANY HOURS THAT SHOW  
5 RAN A DAY?

6           A THERE'S PROBABLY ABOUT THREE OR FOUR DIFFERENT  
7 PEOPLE, I THINK, THAT HOSTED SHOWS DURING THAT DAY.

8           Q OKAY. SO -- AND DO YOU RECALL WHAT TIME OF DAY  
9 THAT SHOW WAS SHOWN ON THE AIR?

10          A IN THE EVENING, AND THEN IN THE LATER PART OF THE  
11 WORKDAY.

12          Q LIKE 2:00 TO 7:00? DOES THAT SOUND RIGHT?

13          A I'M NOT SURE. BUT SURE.

14          Q OKAY.

15                 NOW, THE E-MAIL I JUST SHOWED YOU OUTLINED SORT  
16 OF A -- SOME RULES IN TERMS OF CENSORSHIP REGARDING THIS  
17 NEW SHOW.

18          A UM-HMM.

19          Q DO YOU KNOW WHETHER THOSE RULES WERE FOLLOWED?  
20 AND YOU'RE FREE TO READ IT BEFORE YOU ANSWER.

21          A OKAY. SO YOU'RE NOT ALLOWED TO SAY SWEAR WORDS  
22 OR LICK --

23          Q I'M SORRY?

24          A I'M READING WHAT IT SAYS. YEAH, OKAY.

25          Q OKAY.

26                 SO DO YOU KNOW WHETHER OR NOT WHAT WAS OUTLINED IN THIS  
27 E-MAIL WAS ACTUALLY FOLLOWED WHEN THE SHOW WAS BEING  
28 AIRED?

1 A I'M NOT SURE.

2 Q OKAY. WELL, LET'S TAKE A LOOK AT EXHIBIT 196.

3 I DON'T KNOW IF THAT'S IN EVIDENCE OR NOT.

4 HON. T.A. GREEN: I'M SORRY, IT'S IN EVIDENCE?

5 MR. GOLDBERG: I'M NOT SURE.

6 MS. LEAL: IT'S NOT.

7 MR. GOLDBERG: OKAY. I'M GOING TO ASK THAT

8 EXHIBIT 196 BE ACCEPTED INTO EVIDENCE.

9 HON. T.A. GREEN: ANY OBJECTIONS?

10 MS. GAROFALO: NO OBJECTION, YOUR HONOR.

11 HON. T.A. GREEN: IT WILL BE RECEIVED.

12

13 (EXHIBIT 196 ADMITTED INTO EVIDENCE)

14

15 MR. GOLDBERG:

16 Q NOW, IT'S AN E-MAIL ON SEPTEMBER 12TH, 2016, FROM

17 ARI SCOTT AND YOU'RE COPIED ON THE E-MAIL. AND IT SETS

18 FORTH TOPICS FOR THE SHOW TOMORROW, THAT WOULD BE

19 SEPTEMBER 13TH, OKAY?

20 A OKAY.

21 Q DO YOU SEE THAT?

22 A I DO SEE THAT.

23 Q OKAY.

24 NOW, IF WE GO TO THE NEXT PAGE, IT TALKS ABOUT

25 NEWS -- VARIOUS NEWS ITEMS THAT ARE GOING TO BE

26 DISCUSSED, POLITICS.

27 DO YOU SEE THAT AT THE BOTTOM?

28 A DO I READ, YEAH, I -- I SEE THAT.

1 Q AND THEN ON THE THIRD PAGE, 196.3, IT TALKS ABOUT  
2 POP CULTURE.

3 A YEAH.

4 Q ON PAGE 4, IT TALKS ABOUT SCIENCE AND TECH; IS  
5 THAT CORRECT?

6 A OKAY.

7 Q AND THEN IT TALKS ABOUT HEALTH; RIGHT? IS  
8 THAT... AND THEN UNDER -- ON PAGE 5, IT TALKS ABOUT  
9 WEIRD.

10 A OKAY.

11 Q AN 18-YEAR-OLD WOMAN GETS A TATTOOED EYE -- OR IN  
12 A DRINK, GETS HIS MONEY BACK FOR THE DRINK.

13 A YEAH.

14 Q IS THIS, GENERALLY SPEAKING, IF YOU LOOK AT THE  
15 -- WHAT'S IN THIS SCRIPT, SO TO SPEAK, OR THE TOPICS, IS  
16 THIS GENERALLY THE FORMAT FOR THAT SHOW?

17 A I WASN'T A WRITER ON THE SHOW, SO I WOULDN'T  
18 KNOW.

19 Q WELL, YOU WERE COPIED ON WHAT WOULD BE THE TOPICS  
20 FOR THE SHOW.

21 DOES THAT SUGGEST THAT THESE ARE THE TOPICS THAT  
22 WERE DISCUSSED ON THE SHOW?

23 A I'M GUESSING THAT THEY WERE A LIST OF TOPICS THAT  
24 THE HOSTS COULD PICK WHAT THEY WANTED TO TALK ABOUT.

25 Q ALL RIGHT. THAT'S FINE.

26 MR. GOLDBERG: LET'S LOOK AT SEPTEMBER 13TH, 197.  
27 ASK THAT IT BE ADMITTED INTO EVIDENCE.

28 HON. T.A. GREEN: ANY OBJECTION?

1 MS. GAROFALO: I'M SORRY, YOUR HONOR?

2 MR. GOLDBERG: 197.

3 MS. GAROFALO: GIVE US A MOMENT, YOUR HONOR.

4 NO OBJECTION.

5 HON. T.A. GREEN: IT WILL BE RECEIVED.

6

7 (EXHIBIT 197 ADMITTED INTO EVIDENCE)

8

9 MR. GOLDBERG:

10 Q AND AGAIN, THIS IS AN E-MAIL TO A NUMBER OF  
11 INDIVIDUALS. I BELIEVE THAT YOU'RE -- JUST MAKE SURE,  
12 YEAH, YOU'RE COPIED ON IT.

13 DO YOU SEE THAT?

14 A I WAS COPIED ON, YEAH, I WAS COPIED ON LOTS OF  
15 E-MAILS OVER FIVE YEARS.

16 Q BUT YOU WERE COPIED ON THIS PRESUMABLY BECAUSE  
17 YOU WERE ONE OF THE HOSTS OF THE SHOW; CORRECT?

18 A YEAH, I HAD A SHOW, BUT IT WASN'T -- WE DIDN'T  
19 TALK ABOUT THIS STUFF, WE HAD OUR OWN CONTENT.

20 Q BUT YOU WERE A HOST ON BATTLECAM LIVE OR ON SOME  
21 OTHER SHOW?

22 A IT WAS CALLED BATTLECAM LIVE AND THERE WAS SHOWS  
23 UNDER THAT THAT DIFFERENT PEOPLE HOSTED.

24 Q OKAY. WELL, MY QUESTION IS, AS I UNDERSTAND IT,  
25 THERE WAS FIVE HOURS OF TELEVISION TIME TO BE FILLED.

26 A UM-HMM.

27 Q WERE YOU ONE OF THE HOSTS ON DURING THOSE FIVE  
28 HOURS?

1 A YES.

2 Q AND WASN'T THIS -- THE E-MAILS FROM MARY SCOTT,  
3 WEREN'T THOSE THE TOPICS THAT WERE GOING TO BE DISCUSSED  
4 ON THE SHOW?

5 A AND IF YOU HAD YOUR SHOW THAT YOU COULD COME UP  
6 WITH YOUR OWN TOPICS AND DIDN'T NEED TO BE FED THIS KIND  
7 OF STUFF, THEN YOU COULD TALK ABOUT WHATEVER YOU WANTED.

8 Q OKAY. SO YOU DIDN'T -- YOU WEREN'T LIMITED, IS  
9 WHAT YOU'RE SAYING, TO WHAT'S IN THIS; CORRECT?

10 A CORRECT.

11 Q AND THEN WHAT YOU'RE SAYING, THESE WERE  
12 SUGGESTIONS OF THE TYPE OF PROGRAMMING THAT WAS GOING TO  
13 BE GIVEN; CORRECT?

14 A CORRECT.

15 Q AND YOU, AS THE HOST, COULD DECIDE TO TALK ABOUT  
16 OTHER THINGS; CORRECT?

17 A UM-HMM.

18 Q ALL RIGHT.

19 AND THEN TAKE A LOOK, IF YOU WOULD, I'M GOING TO  
20 SHOW YOU ANOTHER WRITING.

21 TAKE A LOOK AT 198.

22 AND I'LL ASK THAT EXHIBIT 198 BE ADMITTED INTO  
23 EVIDENCE.

24 HON. T.A. GREEN: ANY OBJECTION TO 198?

25 MS. GAROFALO: NO OBJECTION.

26 HON. T.A. GREEN: IT WILL BE RECEIVED.

27

28 (EXHIBIT 198 ADMITTED INTO EVIDENCE)

1 MR. GOLDBERG:

2 Q LET'S LOOK AT THE COVER, THOUGH. IT TALKS ABOUT  
3 THE CALL SHEET FOR THE BATTLECAM SHOW SEPTEMBER 14TH.

4 DO YOU SEE THAT?

5 A YES.

6 Q OKAY. AND ON PAGE 2, WHERE IT TALKS ABOUT -- IT  
7 HAS YOUR NAME AND IT SAYS YOU'RE A MEDIA MANAGER.

8 DO YOU SEE THAT?

9 A CORRECT.

10 Q AND IT SAYS YOU'RE SUPPOSED TO BE THERE AT  
11 1:00 O'CLOCK IN THE AFTERNOON; RIGHT?

12 A OKAY.

13 Q IS THAT -- NO, I'M ASKING YOU.

14 A YEAH, THAT'S WHAT IT SAYS, YEAH.

15 Q OKAY. SO DID YOU HAVE A DUAL ROLE ON THAT SHOW,  
16 ONE BEING TO BE A HOST AND ALSO A MEDIA MANAGER?

17 A YEP.

18 Q OKAY. AND WHAT DOES IT MEAN TO BE THE MEDIA  
19 MANAGER ON THE SHOW?

20 A IF SOMEBODY WAS TALKING ABOUT A SPECIFIC TOPIC,  
21 WE WOULD GO ON A COMPUTER AND GOOGLE SEARCH. IF THEY  
22 ARE TALKING ABOUT A NEW SODA THAT CAME UP, YOU WOULD  
23 PULL UP A PICTURE OF A SODA AND IT WOULD BE SHOWN ON THE  
24 SCREEN BEHIND THEM.

25 Q SO YOU WOULD YOU WORK WITH THE HOSTS  
26 ESSENTIALLY --

27 A UM-HMM.

28 HON. T.A. GREEN: IS THAT A "YES"?

1 THE WITNESS: CORRECT.

2 MR. GOLDBERG:

3 Q -- IN TERMS OF HELPING -- IF THEY WERE TALKING  
4 ABOUT SOMETHING, YOU WOULD HELP BRING IN IMAGES RELATED  
5 TO THAT TOPIC?

6 A YES.

7 Q OKAY. AND IS THAT SOMETHING YOU DID ON A REGULAR  
8 BASIS AS THE MEDIA MANAGER ON THAT SHOW?

9 A NO, I WOULD STAND IN AND DO IT FOR PEOPLE, IF  
10 THEY COULDN'T COME.

11 Q OKAY. AND LOOKING AT THIS CALL TIME, DOES THAT  
12 SUGGEST TO YOU THAT THIS SHOW WAS SHOWN IN THE  
13 AFTERNOON?

14 A YES.

15 Q OKAY. NOW, FINALLY TAKE A LOOK AT EXHIBIT 199.

16 HON. T.A. GREEN: AND 199 IS IN EVIDENCE?

17 MS. LEAL: NO.

18 MS. GAROFALO: NO OBJECTION, YOUR HONOR.

19 HON. T.A. GREEN: IT WILL BE RECEIVED.

20

21 (EXHIBIT 199 ADMITTED INTO EVIDENCE)

22

23 MR. GOLDBERG:

24 Q NOW, THIS ONE ASKS THE PEOPLE THAT RECEIVED THE  
25 E-MAIL TO SORT OF MAKE SOME CHOICES ABOUT WHAT TOPICS  
26 THEY WANTED TO TALK ABOUT; RIGHT?

27 A YES.

28 Q DO YOU RECALL SELECTING ANY OF THESE TOPICS?

1 A MYSELF?

2 Q YEAH.

3 A NO, I DON'T.

4 Q OKAY. WELL, WOULD YOU HAVE SELECTED A TOPIC AT  
5 THAT TIME?

6 MS. GAROFALO: OBJECTION.

7 MR. GOLDBERG:

8 Q IF YOU KNOW.

9 HON. T.A. GREEN: I'M SORRY?

10 MS. GAROFALO: LACKS FOUNDATION. OBJECTION.

11 HON. T.A. GREEN: SUSTAINED.

12 MR. GOLDBERG:

13 Q WOULD YOU HAVE SELECTED -- IF THIS WAS SENT TO  
14 YOU AT THAT TIME, WOULD YOU RECEIVED --

15 A IF I COULDN'T COME UP WITH MY OWN CONTENT AND  
16 NEEDED SOMETHING?

17 MS. GAROFALO: YOUR HONOR, THERE WAS AN  
18 OBJECTION.

19 THE WITNESS: I DON'T KNOW HOW THIS HAS ANYTHING  
20 TO DO WITH WHAT -- I DROVE TWO HOURS TO GO OVER OLD  
21 SCHEDULES?

22 HON. T.A. GREEN: GUYS. I'LL SUSTAIN THE  
23 OBJECTION.

24 MR. GOLDBERG:

25 Q NOW, FINALLY, LET ME LOOK AT -- BY THE WAY, DO  
26 YOU KNOW WHAT DATE MS. REEVES -- WHAT DATE SHE LEFT THE  
27 ORGANIZATION?

28 A I COULDN'T HEAR YOU.

1 Q DO YOU KNOW THE DATES THAT MS. REEVES WORKED?

2 A NO. I DID NOT ASSOCIATE MYSELF WITH HER.

3 Q OKAY. THE -- LET'S GO BACK FOR JUST A MOMENT.

4 YOU WERE ONE OF THE PRODUCERS ON LORD OF THE  
5 FREAKS, WERE YOU NOT?

6 A YES, I WAS.

7 Q AND ALKI DAVID GAVE YOU THAT OPPORTUNITY TO BE A  
8 PRODUCER ON LORD OF THE FREAKS?

9 A THE DIRECTOR.

10 Q UM-HMM.

11 AND WHAT -- WHAT DID -- WHAT WAS -- WHAT DID THAT  
12 MEAN TO BE A PRODUCER ON LORD OF THE FREAKS?

13 A HELP GET THE TALENT AND INTERVIEWS THAT THEY  
14 NEEDED, HELP THEM LOOK THROUGH OLD VIDEOS TO FIND  
15 CONTENT FOR THE SHOW AND PUT IT IN THE MOVIE.

16 Q ALL RIGHT.

17 NOW, WHEN PEOPLE WERE BEING FILMED AT THE COMPANY  
18 OFFICES, WOULD YOU GET THEIR CONSENT TO BEING FILMED?

19 A WE WOULD HAVE PEOPLE SIGN CONSENT AND WE ALSO HAD  
20 SIGNS SAYING THAT IN EVERY DOOR IN THE OFFICE, SAYING  
21 THE MINUTE YOU STEP INSIDE THIS ROOM, YOU COULD BE ON  
22 TELEVISION.

23 Q YEAH.

24 A AND THAT YOU'RE CONSENTING TO BE ON TELEVISION.

25 Q WHICH DOORS -- WHICH DOORS WERE THOSE ON?

26 A EVERY DOOR THAT ENTERED THE BUILDING THAT WE  
27 WORKED IN.

28 Q YEAH.

1 SO EVERY DOOR IN WHAT BUILDING?

2 A IN WHAT BUILDING?

3 Q YEAH.

4 A 342 NORTH CANON DRIVE.

5 Q SO THERE'S A SIGN ON THE FRONT DOOR?

6 A ON -- IN -- INSIDE THE BUILDING, OUTSIDE THE BOOK  
7 DOOR WHERE PEOPLE WOULD BE LET IN, THERE WAS A SIGN THAT  
8 SAID -- ANYWHERE IN THE UNIVERSE THIS MAY BE SHOWN, SO  
9 YOU'RE GOING TO BE FILMED.

10 Q YEAH.

11 SO YOU'RE GOING TO BE FILMED WHEN YOU STEP INTO  
12 THE BUILDING; CORRECT?

13 A CORRECT.

14 Q WHAT ABOUT -- BUT YOU SAID THAT PEOPLE WERE ALSO  
15 ASKED TO SIGN CONSENT FORMS?

16 A YEAH, WE COVERED OUR BUTTS, YEAH.

17 Q WHY -- WHY'D YOU DO THAT?

18 A BECAUSE WE HAVE TO BECAUSE OTHERWISE WE END UP IN  
19 THE COURT LIKE THIS GETTING SUED OVER SOMETHING STUPID.

20 Q OH, SO IT'S STUPID THAT SOMEBODY --

21 A I THINK WHAT SHE'S DOING IS IT STUPID, YES, I DO.

22 Q YOU THINK IT'S STUPID.

23 DO YOU KNOW WHETHER OR NOT -- YOU TALKED ABOUT  
24 THE MAN-GINA AND THERE'S SOMETHING ABOUT A HOLOGRAM.  
25 DO YOU KNOW WHETHER OR NOT MR. DAVID EVER SHOWED THE  
26 MAN-GINA LIVE AT THE -- AT --

27 A I'M NOT SURE IF HE EVER SHOWED HIS MAN-GINA LIVE.

28 Q WELL, DID YOU EVER SEE HIS MAN-GINA LIVE?

1           A YES, I WORKED IN THE STUDIO WHEN WE SHOT HIS --  
2           WHEN WE SHOT HIS HOLOGRAM, YEAH.

3           Q DID YOU EVER SEE HIM DO THAT -- OUTSIDE OF IN THE  
4           STUDIO, DID YOU EVER SEE HIM SHOW THE MAN-GINA?

5           A NOT IN OUR OFFICE, NO.

6           Q NOW, YOU SAID THAT -- DID HE EVER PULL HIS PANTS  
7           DOWN IN FRONT OF YOU?

8           A TO DO THE MAN-GINA, I GUESS, BUT...

9           Q WELL, ASIDE -- I'M NOT TALKING ABOUT THE  
10          MAN-GINA.

11          A NO.

12          Q I'M TALKING ABOUT OUTSIDE THE MAN-GINA, DID MR.  
13          DAVID, IN ALL THE TIME THAT YOU WORKED WITH HIM EVER  
14          PULL HIS PANTS DOWN?

15          A AND HIS UNDERWEAR AS WELL OR JUST HIS PANTS?

16          Q JUST HIS PANTS.

17          A MAYBE. NO -- I'VE NEVER --

18          Q UM-HMM.

19          A -- NOTICED HIM EVER WALKING AROUND NAKED OR WITH  
20          HIS PANTS DOWN OR...

21          Q ALL RIGHT. YEAH.

22          A THAT'S NO.

23          Q DID MR. DAVID EVER TAKE YOUR FINGER AND PUT IT IN  
24          HIS MOUTH?

25          A NO.

26          Q HE NEVER DID THAT?

27          A DID HE EVER PUT MY FINGER IN HIS MOUTH?

28          Q YEAH.

1 A NOT THAT I CAN RECALL.

2 Q DID HE EVER ASK YOU TO HAVE SEX WITH HIM?

3 A NO.

4 Q DID HE EVER ASK YOU TO GO AWAY TO A FOREIGN  
5 COUNTRY WITH HIM IN ORDER TO HAVE SEX?

6 A NO.

7 Q DID MR. DAVID EVER COME UP TO THE OFFICE THAT YOU  
8 HAD, PLACE HIS CHEST, YOU KNOW, OPEN HIS SHIRT, PLACE  
9 HIS CHEST, NIPPLES AGAINST THE WINDOW -- AGAINST THE  
10 GLASS IN YOUR PRESENCE?

11 A NO.

12 Q HE NEVER DID THAT?

13 DID MR. DAVID EVER PUT HIS HANDS AROUND YOUR  
14 NECK?

15 A MAYBE HIM AND I JOKING TOGETHER, WE'RE, LIKE, TO  
16 EACH OTHER BECAUSE HE WOULD DRIVE ME NUTS SOMETIMES AND  
17 HE WOULD --

18 Q YEAH.

19 A -- JOKE AROUND.

20 Q BUT OTHER THAN YOU TWO JOKING AROUND TOGETHER  
21 WHERE YOU WOULD EACH PUT YOUR HANDS, DID HE EVER COME UP  
22 TO YOU AND SQUEEZE YOUR NECK?

23 A NO, NOT -- NOT IN A NON-JOKING MANNER.

24 Q YEAH.

25 WELL, DID HE DO IT TO YOU IN A JOKING MANNER?

26 A YEAH. I WOULD DO IT RIGHT BACK TO HIM.

27 Q AND HOW OFTEN DID THAT HAPPEN?

28 A ALKI IS LIKE FAMILY TO ME. WE JOKED AROUND ALL

1 THE TIME. EVERYBODY IN THE OFFICE JOKED AROUND UNTIL --  
2 UNTIL THEY GET FIRED AND THEN THEY HAVE AN ISSUE.

3 Q YEAH.

4 A THAT'S WHAT THIS WHOLE THING IS LOOKING FOR A  
5 QUICK BUCK.

6 Q YEAH.

7 SO THE -- IN TERMS OF MR. DAVID'S BEHAVIOR AT  
8 WORK -- BY THE WAY, DID HE EVER TALK TO YOU ABOUT A RAPE  
9 ROOM?

10 A NO.

11 Q DID YOU EVER HEAR THE TERM "RAPE ROOM"?

12 A I'VE NEVER HEARD THE TERM RAPE ROOM, NO.

13 Q DID HE EVER TELL YOU THAT HE WANTED TO GO GET  
14 SOME TIES FOR HIS RAPE ROOM?

15 A NO.

16 Q YOU NEVER HEARD THAT; CORRECT?

17 A NO.

18 Q YEAH.

19 DID MR. DAVID EVER TELL YOU THAT -- STRIKE THAT.

20 DID HE -- DID MR. DAVID EVER TRY TO KISS YOU?

21 A NO.

22 Q DID HE EVER SHOW -- DID MR. DAVID EVER TRY TO SEE  
23 ANY INTIMATE PARTS OF YOUR BODY?

24 A NO.

25 Q UM-HMM.

26 NOW, BY THE WAY, LET'S SEE -- I DON'T KNOW THE  
27 DATE OF THIS.

28 MS. GAROFALO: OBJECTION, YOUR HONOR.

1 MR. GOLDBERG: WELL, I'M NOT -- ALL I'M GOING TO  
2 DO IS SHOW IT TO HER AND ASK HER TO IDENTIFY IT.

3 MS. GAROFALO: MY OBJECTION IS THAT YET AGAIN WE  
4 HAVE A DOCUMENT THAT HAS NOT BEEN PRODUCED, THAT IS NOT  
5 ON THE WITNESS LIST --

6 HON. T.A. GREEN: OKAY. WE'LL TAKE OUR AFTERNOON  
7 RECESS.

8 THE WITNESS: THEY CAN DO IT, I DON'T CARE. THEY  
9 CAN BRING ME WHATEVER THEY WANT TO TRY TO SHOW ME.

10 HON. T.A. GREEN: OKAY. THAT'S -- THERE'S AN  
11 OBJECTION AND THAT MEANS THAT I'VE GOT TO MAKE A RULING.

12 THE WITNESS: IT'S A PICTURE OFF MY INSTAGRAM,  
13 WHICH I SEE...

14 HON. T.A. GREEN: OKAY. MY TURN.

15 THE WITNESS: ALL RIGHT.

16 HON. T.A. GREEN: ALL RIGHT. LET'S TAKE OUR NOON  
17 RECESS. WE'LL RECONVENE AT 1:30. I HAVE A BRIEF MATTER  
18 AT 1:30, IT BETTER BE BRIEF, AND THEN WE'LL PROCEED.  
19 THANK YOU. HAVE A GREAT, LIGHT LUNCH. THANK YOU.

20 MR. GOLDBERG: THANK YOU, YOUR HONOR.

21 HON. T.A. GREEN: ALL RIGHT. JURY IS NOT  
22 PRESENT.

23 WHAT'S THE OBJECTION?

24 MS. GAROFALO: ACTUALLY, NOW THAT I'VE LOOKED AT  
25 IT, IT HAS SEVERAL THINGS.  
26 THE FIRST IS --

27 HON. T.A. GREEN: WELL, HANG ON, HANG ON.

28 MS. GAROFALO: -- NOT PRODUCED, NOT ON THE

1 EXHIBIT LIST, LONG STRING OF DOCUMENTS. MS. BOTTO HAS  
2 BEEN ON THE WITNESS LIST. CERTAINLY THIS COULD HAVE  
3 BEEN DISCLOSED. IT IS ALSO CUT OFF. I DON'T KNOW IF IT  
4 WAS INTENTIONALLY --

5 HON. T.A. GREEN: WELL, WHAT IS IT?

6 MS. GAROFALO: IT'S SOME -- IT LOOKS -- IT'S NOT  
7 DATED. IT LOOKS LIKE SOMETHING THAT MS. BOTTO MAY HAVE  
8 POSTED.

9 THE WITNESS: IT'S A PICTURE FROM THE MEDIA  
10 PREMIERE.

11 HON. T.A. GREEN: OKAY. THANK YOU. THANK YOU,  
12 GUYS. MY TURN, RIGHT?

13 MS. GAROFALO: YEAH, WE DON'T KNOW WHAT'S CUT OFF  
14 AT THE BOTTOM. NOT DATED.

15 MS. LEAL: THE REASON THEY ARE ON TWO PAGES IS  
16 BECAUSE IT DIDN'T FIT ON ONE PAGE, YOUR HONOR, BUT THE  
17 EXHIBIT WE HAVE IS ALL ON ONE PAGE THAT WOULD BE  
18 DISPLAYED.

19 MS. GAROFALO: AND RELEVANCE.

20 MR. GOLDBERG: WELL, FIRST OF ALL, MAY I ASK THE  
21 WITNESS TO STEP OUTSIDE, YOUR HONOR, WHILE WE GO OVER  
22 THE OBJECTIONS?

23 HON. T.A. GREEN: YEAH. MS. JOHNSON, WILL YOU  
24 WAIT OUTSIDE FOR US?

25 MR. DAVID: HE'S SO PATHETIC THIS GUY.

26 MR. GOLDBERG: THIS IS IMPEACHMENT AND I'M  
27 ENTITLED TO ASK HER ABOUT IT.

28 HON. T.A. GREEN: WHAT'S -- WHAT'S IMPEACHING

1 ABOUT IT?

2 MR. GOLDBERG: IT'S IMPEACHING BECAUSE SHE  
3 TESTIFIED THAT THAT -- ABOUT 127 WAS UP FOR A WEEK IN  
4 2014, I BELIEVE THIS WAS MUCH LATER.

5 MS. GAROFALO: THERE'S NO DATE ON IT, YOUR HONOR.

6 MR. GOLDBERG: HOLD ON A SECOND.  
7 SHE CAN TELL US WHEN IT WAS AND I'M ENTITLED TO ASK HER  
8 ABOUT IT AND SHE'S TALKING ABOUT ME AND MY PARTNER IN  
9 CRIME AND BUSINESS PARTNER AT FILMON TV HR COMPANY AND  
10 HER-ASS AND SHE'S, YOU KNOW, SHE'S POSTING THIS AT A  
11 MUCH LATER DATE AND I THINK IT'S --

12 HON. T.A. GREEN: WELL, WHAT DATE?

13 MS. GAROFALO: WHAT DATE? THERE'S NO DATE ON IT.

14 MR. GOLDBERG: I CAN ASK HER ABOUT THAT, YOUR  
15 HONOR. THAT'S ALL I'M SAYING.

16 MS. GAROFALO: YOUR HONOR, THIS WAS APPARENTLY  
17 USED AS AN EXHIBIT IN ONE OF MS. BLOOM'S CASES. THIS IS  
18 ONE OF MULTIPLE EXHIBITS WE'VE BEEN HANDED THAT  
19 APPARENTLY HAVE BEEN HANDED OVER BY THE COUNSEL WITH  
20 WHOM THEY ARE NOT COMMUNICATING ALLEGEDLY.

21 MR. GOLDBERG: I DIDN'T SAY WE'RE NOT  
22 COMMUNICATING. I SAID WE DON'T -- WE ARE NOT...

23 HON. T.A. GREEN: GUYS, I'M STILL UP HERE. I  
24 HAVEN'T MOVED, OKAY.

25 MR. GOLDBERG: ALL RIGHT. THE POINT IS, YOUR  
26 HONOR, ALL I WANT TO DO IS SHOW IT TO HER, ASK HER IF  
27 SHE COULD TELL US WHEN THIS WAS.

28 HON. T.A. GREEN: I DON'T SEE WHAT THE PROBLEM

1 IS. I MEAN, IT'S...

2 MS. GAROFALO: WELL, HERE'S THE PROBLEM. THIS IS  
3 BEING STRUNG OUT, WE NOW HAVE THEIR PSYCHOLOGIST FOR AN  
4 EXTREMELY LIMITED PERIOD OF TIME. WE COULDN'T GET HER  
5 FOR DEPOSITION, SHE ONLY HAS LIMITED TIME, WE ONLY GOT  
6 CUT A VERY SHORT TIME THE OTHER DAY. NOW WE WERE  
7 CONFINED TO A COUPLE OF HOURS, THAT'S BEEN SHUT DOWN FOR  
8 NO FAULT OF MR. GOLDBERG, AND WE'RE GOING TO HEAR THAT  
9 SHE CANNOT COME BACK AND MY EXAMINATION --

10 HON. T.A. GREEN: OH, SHE'LL COME BACK. I'LL  
11 ORDER HER TO COME BACK.

12 MS. GAROFALO: -- OF AN IMPORTANT WITNESS,  
13 DAMAGES IS GOING TO BE TRUNCATED BECAUSE NOW WE'RE GOING  
14 TO BE TALKING ABOUT I DON'T KNOW WHAT.

15 HON. T.A. GREEN: OKAY. WELL, YOU KNOW, I CAN  
16 ALWAYS USE THE O WORD AND ORDER PEOPLE BACK. I MEAN,  
17 IT'S THE...

18 MS. GAROFALO: THEN IF YOU WILL ORDER DR. MEYER  
19 BACK IF WE'RE NOT FINISHED TODAY AND I WILL DO MY BEST  
20 TO FINISH, THEN GO AHEAD, THEY CAN HAVE A BALL WITH  
21 THIS.

22 HON. T.A. GREEN: WELL, SOMEBODY IS PAYING FOR  
23 THE DOCTOR; RIGHT?

24 MR. GOLDBERG: SO FAR NOBODY HAS PAID FOR THE  
25 DOCTOR.

26 HON. T.A. GREEN: DOES SHE KNOW THAT?

27 MR. GOLDBERG: I THINK SHE HOPES TO GET PAID.

28 HON. T.A. GREEN: OH, OKAY. WELL, MOVING ON.

1 I'LL OVERRULE THE OBJECTION ON THIS.

2 OKAY, GUYS, WE -- AND I -- I APOLOGIZE, I TOLD  
3 YOU I HAVE THE RARE PRIVILEGE OF GOING TO AN EVENT IN LA  
4 QUINTA THAT I HAVE TO GET TO.

5 (OFF-RECORD COMMENTS)

6 MS. GAROFALO: ANYWAY, YOUR HONOR, CAN WE THEN  
7 HAVE DR. MEYER ORDERED BACK, I MEAN, THIS IS --

8 HON. T.A. GREEN: I WILL. OKAY. NO, I CAN DO  
9 THAT.

10 MR. GOLDBERG: MAYBE SHE'LL FINISH.

11 HON. T.A. GREEN: OKAY, GUYS.

12 MS. GAROFALO: IF I FINISH, HE DOESN'T HAVE TO  
13 ORDER HER BACK, HOW IS THAT?

14 MR. GOLDBERG: I DON'T KNOW.

15 HON. T.A. GREEN: ALL RIGHT. PEOPLE, CAN I HELP  
16 YOU FURTHER, PLAINTIFF?

17 MR. GOLDBERG: NO, YOUR HONOR.

18 HON. T.A. GREEN: CAN I HELP YOU, DEFENSE?

19 MR. KALTGRAD: JUST FOR THE RECORD, YOUR HONOR, I  
20 THINK THE VIDEO THAT WE SHOWED I THINK SHOULD BE MARKED  
21 AS 645, NEXT IN ORDER.

22 HON. T.A. GREEN: IT WILL BE MARKED AND IT WILL  
23 BE IN EVIDENCE.

24

25 (EXHIBIT 645 ADMITTED INTO EVIDENCE)

26

27 HON. T.A. GREEN: OKAY. SO IF I LEAVE AT 3:15,  
28 IT'S NOT -- IT STILL MIGHT NOT BE ENOUGH TIME.

1 (OFF-RECORD COMMENTS)

2 HON. T. A. GREEN:: OKAY. WE'LL SEE YOU AT 1:30.

3 {LUNCHEON RECESS}

4 HON. T.A. GREEN: OKAY. ON THE RECORD. THE JURY  
5 IS PRESENT. COUNSEL ARE PRESENT.

6 WELCOME BACK.

7 YOU'RE STILL UNDER OATH.

8 PLEASE PROCEED, PLAINTIFF. I GOT YOU RIGHT THAT  
9 TIME.

10 MR. GOLDBERG: YOU DID INDEED, YOUR HONOR. THANK  
11 YOU.

12 HON. T.A. GREEN: ALL RIGHT.

13 MR. GOLDBERG: YOUR HONOR, MAY I APPROACH THE  
14 WITNESS?

15 HON. T.A. GREEN: YES.

16 MR. GOLDBERG:

17 Q I'M GOING TO SHOW YOU A DOCUMENT.

18 A OH, I KNOW, I LOOKED IT UP.

19 Q OH, YOU DID.

20 TELL ME IF YOU'VE EVER SEEN THAT BEFORE.

21 A YES, I HAVE.

22 Q AND DO YOU SEE THE DATE ON THE DOCUMENT?

23 A JULY 1ST, 2015.

24 Q IS THAT WHEN YOU POSTED IT?

25 A I CAN'T HEAR YOU.

26 Q IS THAT WHEN YOU POSTED THIS DOCUMENT?

27 A I WOULD ASSUME SO.

28 Q OKAY.

1 MR. GOLDBERG: I'M GOING TO ASK THAT IT BE  
2 ADMITTED, YOUR HONOR.

3 HON. T.A. GREEN: YES, WE DISCUSSED THAT. IT'S  
4 GOING TO BE ADMITTED.

5 MR. GOLDBERG: OKAY. NOW, CAN WE SHOW THE FIRST  
6 PAGE, PLEASE.

7 Q I BELIEVE THAT'S YOU ON THE LEFT.

8 A CORRECT.

9 Q AND WHO WERE YOU WITH?

10 A JANELLE BOWER.

11 Q BOWER.

12 AND IF WE LOOK AT PAGE 2, IT SAYS -- CAN WE GO TO  
13 THE SECOND PAGE OF THAT EXHIBIT, PLEASE. OKAY.

14 IT SAYS, "SOMETIMES WE ARE CLASSY, NOT AT THIS  
15 MOMENT. OKAY, FINE. WE ARE CLASSY. ME AND MY PARTNER  
16 IN CRIME AND BUSINESS PARTNER AT FILMON TV HR AND  
17 HER-ASS WHERE JANELLE AND I GIVE YOU JUST A TIP ON HOW  
18 TO HARASS YOUR CO-WORKERS CORRECTLY."  
19 AND THEN THERE'S SOMETHING, @TICKLEJIB.

20 IS THAT YOURS?

21 A NO, THAT'S JANELLE'S INSTAGRAM HANDLE.

22 Q OH, OKAY.

23 AND THEN THERE'S SOMETHING CALLED "#CLASSY PEOPLE  
24 TAKE PHOTOS OF TOILETS IN THE BACKGROUND."

25 IS THAT YOURS?

26 A YEAH.

27 Q AND THEN YOU'VE GOT HER-ASS NUMBER, HER-ASS  
28 NUMBER, MY NAME BITCH NUMBER OPPORTUNISTS; IS THAT YOU?

1 A YEP.

2 Q OKAY. AND THEN YOU'VE GOT "#SIDE, TIP NUMBER,  
3 FILMON TV NUMBER; THAT'S YOU?

4 A YES.

5 Q AND THEN YOU'VE GOT, "#MOVIE PREMIER, #BATHROOM,  
6 #CLASSY, --

7 HON. T. A. GREEN:: I THINK IT'S CALLED HASH TAG.

8 THE WITNESS: IT IS CALLED HASH TAG. THANK YOU.

9 HON. T.A. GREEN: I KNEW THAT. I KNEW THAT.  
10 IT'S THE HOME & GARDEN CHANNEL.

11 MR. GOLDBERG: OKAY. HASH TAG. THANK YOU.

12 Q AND THEN YOU'VE GOT, NUMBER OR "#WEDNESDAY, #HUMP  
13 DAY;" IS THAT YOURS AS WELL?

14 A CORRECT.

15 Q NOW, IN LIGHT OF YOUR TESTIMONY THIS MORNING IN  
16 WHICH YOU SAID THAT THAT POSTER THAT WE SAW, NUMBER  
17 127 --

18 A YEAH.

19 Q -- WAS PUT UP FOR A WEEK IN 2014, WHY ARE YOU  
20 TALKING ABOUT IT IN 2015 IN JULY?

21 A 'CAUSE -- WELL, WHY AM I TALKING ABOUT SOMETHING  
22 TWO YEARS LATER?

23 Q IT WASN'T TWO YEARS LATER.

24 A OR A YEAR LATER?

25 Q ACCORDING TO YOUR TESTIMONY, YOU SAID IT WAS UP  
26 FOR A WEEK IN 2014 AND THEN YOU TOOK IT DOWN.

27 A OKAY.

28 Q AND HERE IT SEEMS THAT YOU'RE REFERRING --

1 A BECAUSE I'M JOKING ABOUT IT.

2 Q SO YOU'RE REFERRING TO THE POSTER THAT YOU HAD  
3 TAKEN DOWN A YEAR EARLIER?

4 A YES.

5 Q OKAY. AND DO YOU RECALL WHY YOU WERE JOKING  
6 ABOUT IT AT THAT PARTICULAR TIME?

7 A NO.

8 Q WAS IT TIED IN TO ANY PARTICULAR EVENT?

9 A THAT WAS A MOVIE PREMIERE THAT WE WERE DOING FOR  
10 ALKI'S MOVIE LORD OF THE FREAKS.

11 Q OKAY. WAS THAT THE DATE OF THE MOVIE PREMIERE?

12 A I DON'T REMEMBER EXACTLY WHAT DAY IT WAS ON.

13 Q ABOUT THE SAME TIME?

14 A SURE.

15 Q OKAY.

16 A I DON'T KNOW WHEN -- OR THIS ONE WAS, YEAH, WHEN  
17 HIS MOVIE PREMIERED.

18 Q RIGHT.

19 SO THE DAY OF THE MOVIE PREMIERE, YOU THOUGHT IT  
20 WOULD BE FUNNY TO POST SOMETHING ABOUT THAT POSTER  
21 HER-ASS; RIGHT?

22 A CORRECT.

23 MS. GAROFALO: OBJECTION. OBJECTION, YOUR HONOR.  
24 RELEVANCE.

25 HON. T.A. GREEN: WELL, YEAH -- I DON'T -- THIS  
26 WITNESS, THE FACT THAT SHE POSTED IT ON THE DAY OF THE  
27 PREMIER --

28 MR. GOLDBERG: WELL, THE ONLY REASON I BRING IT

1 UP, YOUR HONOR, IS BECAUSE SHE TESTIFIED THAT SHE HAD  
2 TAKEN IT DOWN A YEAR EARLIER. BUT I'LL MOVE ON.

3 HON. T.A. GREEN: ALL RIGHT.

4 THE WITNESS: I DIVORCED MY HUSBAND A YEAR AGO,  
5 BUT I STILL HAVE TO TALK, LIKE, HE'S STILL RELEVANT.

6 MR. GOLDBERG: YEAH. OKAY.

7 Q DO YOU RECALL SOMEONE BY THE NAME OF YELENA  
8 CALENDAR?

9 A YELENA CALENDAR?

10 Q YELENA CALENDAR, RATHER, YEAH.

11 A YES, I WORKED WITH HER.

12 Q YOU WORKED WITH HER?

13 A YES.

14 Q DO YOU RECALL WHAT YEAR OR YEARS YOU WORKED WITH  
15 MS. CALENDAR?

16 A 2012 TO WHENEVER IT WAS THAT SHE LEFT THE  
17 COMPANY.

18 Q DO YOU HAVE ANY RECOLLECTION THAT AT SOME POINT  
19 IN TIME MS. CALENDAR TOLD TO YOU TAKE THAT POSTER DOWN?

20 A NO, I DON'T RECALL THAT.

21 Q DO YOU DENY THAT THAT OCCURRED?

22 A NO, I DO NOT RECALL THAT. I'M NOT DENYING IT.

23 Q OKAY. YOU'RE NOT FAMILIAR WITH HER TESTIMONY IN  
24 THIS TRIAL, I TAKE IT; RIGHT?

25 A NO.

26 Q YOU DON'T KNOW WHETHER SHE TESTIFIED THAT SHE  
27 ASKED YOU TO TAKE IT DOWN?

28 A YES, THAT'S WHAT I JUST SAID.

1 Q OKAY. NOW, DO YOU RECALL EVER POSTING ANYTHING  
2 ONLINE ABOUT "HANDS AROUND MY NECK" RELATING TO MR.  
3 DAVID?

4 A NOT RELATING TO MR. DAVID.

5 Q OR SOMEBODY ELSE; IS THAT RIGHT?

6 A I DON'T KNOW WHERE YOU'RE GOING WITH THIS.

7 Q OKAY.

8 A IF YOU CAN DISSECT ANY SENTENCE I'VE EVER WRITTEN  
9 ONLINE AND THEY ARE NOT GEARED TOWARDS ALKI.

10 Q OKAY. SO -- NOW, YOU'VE TOLD US THIS MORNING  
11 THAT ALKI WAS LIKE FAMILY AND TOLD US THAT HE WAS THE  
12 GODFATHER OF YOUR CHILD; CORRECT?

13 A CORRECT.

14 Q HOW OFTEN DO YOU SEE THE GODFATHER OF YOUR CHILD?

15 A HOW OFTEN DOES HE SEE HER?

16 Q NO. HOW OFTEN DO YOU SEE MR. DAVID?

17 A WHENEVER -- WHEN I'VE DONE WORK FOR HIM, I'VE  
18 SEEN HIM. WHEN AFTER I HAD HER, I DID SOME WORK FOR HIM  
19 FOLLOWING UP FOR THE HOLOGRAM COMPANY.

20 Q YEAH.

21 A BUT HE TRAVELS A LOT. I AM A MOTHER -- I'M A  
22 SINGLE MOTHER, I CAN'T GO ON -- GO VISITING PEOPLE TWO  
23 HOURS AWAY FROM MY HOUSE ALL THE TIME.

24 Q I'M NOT SUGGESTING YOU SHOULD VISIT ANYONE  
25 ANYTIME. I'M ASKING YOU WHEN YOU'VE SEEN HIM.

26 A UM-HMM.

27 Q CAN YOU TELL US WHEN'S THE LAST TIME YOU SAW HIM  
28 BEFORE TODAY?

1 A I SAW ALKI A MONTH AGO.

2 Q OKAY. AND WAS HE -- WHERE DID YOU SEE HIM A  
3 MONTH AGO?

4 A IN MALIBU.

5 Q OKAY. YOU WENT TO HIS HOME?

6 A CORRECT.

7 Q WITH YOUR CHILD?

8 A NO, SHE STAYED AT HOME.

9 Q OKAY.

10 A SHE WAS SICK.

11 Q AND OTHER THAN GOING TO HIS HOUSE IN MALIBU A  
12 MONTH AGO, WHEN DID YOU SEE MR. DAVID BEFORE THAT?

13 A BEFORE THAT, I SAW HIM IN THIS COURTHOUSE.

14 Q OKAY. IN CONNECTION WITH SOME OTHER MATTER;  
15 RIGHT?

16 A MORE SCAMS, YES.

17 Q OKAY. AND SO ASIDE FROM THE TIME -- THOSE TIMES,  
18 HAVE YOU HAD ANY OTHER OCCASION TO SEE MR. DAVID THIS  
19 YEAR?

20 A THIS YEAR, NO, I HAVEN'T.

21 Q WHAT ABOUT LAST YEAR?

22 A I THINK I SAW HIM, LIKE, TWICE MAYBE.

23 Q OKAY. DID YOU HAVE ANY -- WHEN'S THE LAST TIME  
24 YOU'VE DONE ANY WORK FOR MR. DAVID?

25 A AT -- RIGHT BEFORE I HAD MY DAUGHTER WHEN SHE WAS  
26 -- WHEN I WAS NINE MONTHS PREGNANT WITH HER.

27 Q I THINK YOU SAID EIGHT MONTHS PREGNANT; RIGHT?

28 A NO, THAT'S WHEN I LEFT THE COMPANY. WHEN THE

1 COMPANY CLOSED, I WAS EIGHT MONTHS PREGNANT.

2 Q OH, I'M SORRY.

3 SO YOU LEFT THE COMPANY WHEN YOU WERE EIGHT MONTHS  
4 PREGNANT BUT YOU CONTINUED DOING WORK?

5 A OR IT WAS -- I DON'T KNOW EXACTLY -- IT WAS -- I  
6 COULD TELL YOU EXACTLY WHERE IT WAS AND WHAT WE DID.

7 Q NO, NO. I'M JUST TRYING TO CLARIFY THE TIME  
8 FRAME.

9 I THINK YOU SAID THAT YOU WERE EIGHT MONTHS PREGNANT  
10 WHEN YOU WERE LET GO, DID I GET THAT RIGHT?

11 A CORRECT. AND HE STILL CONTINUED TO DO SOME STUFF  
12 WITH THE HOLOGRAMS.

13 Q YEAH.

14 A AND STILL HAD A COUPLE PEOPLE EMPLOYED.

15 Q WERE YOU ONE OF THEM?

16 A HE NEEDED SOME CONNECTIONS THAT I HAD TO BRING IN  
17 SOME PEOPLE TO DO A HOLOGRAM, SO I DID SOME WORK FOR  
18 HIM.

19 Q OKAY. THAT'S FINE.

20 AND YOU CONTINUED WORKING FOR HIM UNTIL WHEN?

21 A UNTIL THEN, I GUESS.

22 Q I'M SORRY, UNTIL WHEN?

23 A UNTIL THE END OF THIS ONE SHOOT THAT WE DID.

24 Q OKAY. NOW --

25 A HE'S ASKED ME TO COME DOWN AND HOST EVENTS AT THE  
26 HOLOGRAM THEATRE, BUT AGAIN, I CAN'T JUST PICK UP AND  
27 LEAVE ALL THE TIME.

28 Q YEAH.

1 YOU'VE SAID THAT, YOU KNOW, THAT PEOPLE WHEN THEY GET  
2 FIRED, THEN THEY HAVE ISSUES, RIGHT, THAT'S -- THOSE  
3 WERE YOUR WORDS?

4 A CORRECT.

5 Q NOW, WAS IT YOUR UNDERSTANDING THAT MS. REEVES  
6 WAS FIRED?

7 A I DON'T KNOW. I -- HONESTLY, LIKE I HAD TOLD  
8 YOU --

9 Q SO DO YOU --

10 HON. T.A. GREEN: WAIT, WAIT. ONE AT A TIME.

11 MR. GOLDBERG: MOVE TO STRIKE. MOVE TO STRIKE.

12 THE WITNESS: MY TURN.

13 HON. T.A. GREEN: WAIT, GUYS, SHE WAS ANSWERING  
14 AND YOU CUT HER OFF.

15 MR. GOLDBERG: I JUST ASKED HER -- WHAT I ASKED  
16 HER WAS WHETHER SHE KNOWS WHETHER MS. REEVES WAS FIRED  
17 OR NOT AND SHE SAID SHE DOESN'T KNOW.

18 HON. T.A. GREEN: DO YOU KNOW?

19 THE WITNESS: I DO NOT KNOW.

20 MR. GOLDBERG:

21 Q OKAY.

22 AND THEN MY NEXT QUESTION IS DID MR. DAVID TELL YOU THAT  
23 SHE HAD BEEN FIRED?

24 A NO.

25 Q OKAY. DO YOU KNOW ANY OF THE CIRCUMSTANCES  
26 SURROUNDING HER --

27 A ALL I KNOW IS --

28 HON. T.A. GREEN: WAIT, WAIT. GUYS. WAIT.

1 QUESTION PAUSE, ANSWER PAUSE.

2 YOUR TURN.

3 MR. GOLDBERG:

4 Q DO YOU KNOW ANY OF THE CIRCUMSTANCES AS TO HOW  
5 SHE LEFT THE COMPANY?

6 A NO.

7 Q WHEN -- IN SEPTEMBER OF 2016, I BELIEVE YOU'VE  
8 INDICATED THAT YOU WERE A HOST ON THE SHOW BATTLECAM  
9 LIVE; RIGHT?

10 A ON BATTLECAM LIVE. YES.

11 Q YEAH.

12 HOW LONG DID THAT CONTINUE FOR?

13 A I THINK WE ONLY KEPT IT UP AND RUNNING FOR A  
14 COUPLE OF MONTHS AND THEN WE SHUT IT DOWN AGAIN.

15 Q DO YOU RECALL THERE WAS A POINT IN TIME WHEN MS.  
16 REEVES WAS NO LONGER COMING TO WORK AT BATTLECAM LIVE?

17 A I ACTUALLY COULD CARE LESS. I COULD CARE LESS  
18 FOR YOU AS A PERSON, SO I DIDN'T REALLY ASSOCIATE WITH  
19 HER, SO I WASN'T WORRIED ABOUT IF SHE WAS COMING TO  
20 WORK, IF SHE WAS IN TIMBUKTU, I DON'T -- DID NOT CARE  
21 WHERE SHE WAS.

22 Q RIGHT.

23 I UNDERSTAND THAT YOU DIDN'T CARE WHERE SHE WAS.

24 MY QUESTION WAS, DID YOU HAPPEN TO NOTICE --

25 A NO.

26 Q -- AFTER SEPTEMBER 19TH, 2016, THAT SHE WAS NO  
27 LONGER --

28 A WELL, EVENTUALLY, ONE DAY, YES, I DID.

1           HON. T.A. GREEN: OKAY, GUYS, YOU'VE GOT TO PAUSE  
2 -- QUESTION PAUSE, ANSWER PAUSE, QUESTION PAUSE, YOU'RE  
3 OVERLAPPING.

4 MR. GOLDBERG:

5           Q OKAY. WHEN DID YOU FIRST REALIZE THAT MS. REEVES  
6 WAS NOT COMING TO WORK?

7           A A COUPLE WEEKS AFTER SHE WASN'T WORKING THERE  
8 ANYMORE.

9           Q RIGHT. AND DID YOU SPEAK TO MR. DAVID AS TO WHY  
10 SHE WASN'T COMING TO WORK?

11          A NO, BECAUSE I COULD CARE LESS.

12          Q OKAY. WELL, I THINK YOU'VE SAID THAT SEVERAL  
13 TIMES NOW.

14          A YOU'VE ASKED ME THE SAME QUESTION SEVERAL TIMES.

15          Q ALL RIGHT. WELL -- SO AT THE POINT IN TIME THAT  
16 SHE WAS NOT COMING TO WORK, WHO TOOK OVER HER DUTIES AND  
17 RESPONSIBILITIES?

18          A I DON'T EVEN KNOW WHAT HER ROLE WAS BESIDES A  
19 WRITER FOR A SHOW THAT DID NOT NEED WRITING, SO NOBODY  
20 NEEDED TO TAKE OVER HER POSITION.

21          Q SO WASN'T SHE ALSO A HOST ON THAT SAME SHOW THAT  
22 YOU WERE A HOST ON?

23          A WE STOPPED ALL THE SHOWS.

24          Q RIGHT. WELL, WHEN DID THAT HAPPEN?

25          A I DON'T KNOW EXACTLY WHAT DATE IT HAPPENED --  
26 WHAT -- IN RELATION TO WHEN SHE WORKED THERE OR DIDN'T  
27 WORK THERE.

28          Q OKAY. NOW, EXCUSE ME. I THINK YOU TOLD US THAT

1 YOU ALSO WORKED AT THE HOLOGRAM PART OF THE BUSINESS;  
2 CORRECT?

3 A CORRECT.

4 Q NOW, DO YOU -- WERE YOU EVER PRESENT WHEN MS.  
5 REEVES WAS -- WAS THERE WITH A COMIC SHOWING HIM HOW THE  
6 HOLOGRAMS WORK?

7 A NO.

8 Q DID YOU DO ANY OF THOSE DEMONSTRATIONS?

9 A CORRECT. YEAH, I DID.

10 Q DID YOU EVER DO THEM WHEN MS. REEVES WAS THERE?

11 A I DON'T BELIEVE SO.

12 Q OKAY. YOU ALSO SAID THAT YOU BUILT THE HOLOGRAMS  
13 AT VARIOUS -- WAS THAT FOR VARIOUS CUSTOMERS?

14 A UM-HMM.

15 HON. T.A. GREEN: YES?

16 THE WITNESS: YES.

17 MR. GOLDBERG:

18 Q DOES THAT MEAN THAT YOU WERE OFF-SITE PART OF THE  
19 TIME OF YOUR WORK?

20 A YES.

21 Q AND HOW MUCH -- LET'S SAY, DURING YEAR 2016, HOW  
22 MUCH OF YOUR TIME WERE YOU NOT AT THE CORPORATE OFFICES?

23 A WELL, I WOULD ALSO WORK ABOUT 12-HOUR DAYS, SO  
24 SOMETIMES HALF OF THAT WOULD BE ON-SITE AT SOMETHING  
25 THAT WAS IN L.A., SOMETIMES IT WOULD BE IN A DIFFERENT  
26 STATE, SOMETIMES I WOULD BE FULLY IN THE OFFICE.

27 Q OKAY. CAN YOU GIVE US ANY APPROXIMATION IN THE  
28 YEAR 2016, HOW MUCH OF THAT YEAR YOU WERE OUT OF THE

1 OFFICE? WERE YOU BASICALLY IN ANOTHER STATE OR ON-SITE  
2 AT SOME CUSTOMER?

3 A I WOULD SAY ON AVERAGE A WEEK OUT OF THE MONTH.

4 Q ONE WEEK YOU WOULD BE GONE?

5 A OUT OF EVERY MONTH, YEAH.

6 Q OKAY. AND WHEN YOU WERE GONE, WHO TOOK OVER YOUR  
7 RESPONSIBILITIES?

8 A MY RESPONSIBILITY WAS WITH ME, SO IT -- I WAS  
9 TAKING CARE OF IT WHEN I WAS ON THE ROAD.

10 Q SO HOW MUCH TIME -- WELL, DURING THAT PERIOD OF  
11 TIME, WERE YOU WORKING SOLELY ON HOLOGRAMS?

12 A YEAH.

13 Q HOW LONG DID YOU WORK SOLELY ON THE HOLOGRAM PART  
14 OF THE BUSINESS?

15 A LIKE, THE LAST TWO YEARS WORKING THERE.

16 Q SO I DIDN'T QUITE UNDERSTAND WHEN YOU LEFT.

17 CAN YOU GIVE US THAT AGAIN, WHAT YEAR?

18 A 2017, AUGUST 12TH.

19 Q SO YOU'RE SAYING THE LAST TWO YEARS OF YOUR  
20 EMPLOYMENT. WOULD THAT MEAN FROM AUGUST OF '15 TO  
21 AUGUST '17 YOU WERE EXCLUSIVELY ON HOLOGRAMS?

22 A YES.

23 Q AND DID YOU DO ANY WORK ON SHOWS DURING THAT  
24 TIME --

25 A YES.

26 Q -- WHEN YOU WERE AT HOLOGRAM?

27 A SO I GUESS TECHNICALLY, YES, IT WAS SOME STUFF  
28 FOR FILMON.

1 Q OKAY. THIS --

2 A AND ALL OF HIS --

3 HON. T.A. GREEN: WAIT, WAIT, WAIT. YOU'RE  
4 MAKING IT REALLY HARD OF MADAM REPORTER TO TAKE ALL THIS  
5 DOWN.

6 SO DID YOU FINISH YOUR QUESTION?

7 MR. GOLDBERG: NO.

8 HON. T.A. GREEN: OKAY. FINISH YOUR QUESTION.

9 MR. GOLDBERG:

10 Q YOU DID STILL DO SOME WORK ON FILMON; CORRECT?

11 A CORRECT.

12 Q AND THAT WAS IN CONNECTION WITH THAT BEVERLY --  
13 WITH THE BATTLECAM LIVE SHOW THAT YOU TOLD US ABOUT --

14 A CORRECT.

15 Q -- IS THAT CORRECT?

16 A CORRECT.

17 Q OKAY. NOW, I THINK YOU ALSO SAID ALL THESE WOMEN  
18 FILING LAWSUITS, WERE THOSE YOUR WORDS?

19 A YEAH. AND MEN, I GUESS, NOW TOO, SO...

20 Q NOW, THE -- WAS -- DID THAT INCLUDE MARY RIZZO?

21 A I KNEW HIS GIRLFRIEND, YES. I DO KNOW THAT SHE  
22 DID FILE A CASE.

23 MS. GAROFALO: YOUR HONOR, OBJECTION. THIS IS  
24 VIOLATING --

25 HON. T.A. GREEN: SUSTAINED.

26 MR. GOLDBERG: WELL, I JUST WANT TO KNOW WHAT SHE  
27 WAS REFERRING TO, YOUR HONOR.

28 HON. T.A. GREEN: OKAY. BUT WE'VE HAD

1 DISCUSSIONS ABOUT THIS. LET'S MOVE ON.

2 MR. GOLDBERG: NOW -- I HAVE NOTHING FURTHER.

3 HON. T.A. GREEN: THANK YOU.

4 DEFENSE. GOT IT RIGHT THAT TIME, TWICE IN A ROW.

5

6

REDIRECT EXAMINATION

7

MS. GAROFALO:

8

Q OKAY. VERY BRIEFLY, MS. JOHNSON.

9

BEHIND YOU THERE ARE NOTEBOOKS AND MAYBE MR.

10

KALTGRAD CAN HELP YOU FIND EXHIBIT 198.

11

MR. KALTGRAD: WE ACTUALLY HAVE IT.

12

MS. GAROFALO: OH, IT'S ACTUALLY IN. OKAY. SO

13

LET'S PUT UP EXHIBIT 198. AND THIS WAS SHOWN TO YOU BY

14

MR. GOLDBERG.

15

OKAY. CAN YOU GO DOWN TO THE CHART.

16

MR. GOLDBERG: DO YOU WANT TO SEE A HARD COPY?

17

MS. GAROFALO: THAT'S FINE.

18

Q OKAY. SO IS THERE A HARD COPY IN THERE? CAN I

19

HAVE THE IPAD. OKAY.

20

SO TELL US AGAIN WHAT EXHIBIT 198 IS, IF YOU

21

RECALL?

22

A BATTLECAM SCHEDULE, THE CALL SHEET.

23

Q OKAY. AND DO YOU REMEMBER MR. GOLDBERG ASKING

24

YOU ABOUT TOPICS AND POLITICS AND NEWS AND SOCIAL

25

EVENTS?

26

A YEAH.

27

Q DO YOU RECALL THAT?

28

CAN WE GO TO PAGE -- ACTUALLY, GO TO PAGE 3 OF

1 THIS, MR. KALTGRAD.

2 THIS IS THE PAGE THAT MR. GOLDBERG DID NOT SHOW  
3 YOU.

4 ARE WE THERE?

5 MR. KALTGRAD: THAT'S THE PAGE THERE.

6 MS. GAROFALO: OKAY. CAN YOU MAKE IT A LITTLE  
7 BIT BIGGER.

8 Q WHAT IS PAGE 3? WHAT IS THIS THAT WE'RE LOOKING  
9 AT, IF YOU KNOW?

10 A SAYING WHO'S TALENT AND IN THE BACK AND THE  
11 COMPANIES.

12 Q OKAY. IS IT THE ACTUAL RUNDOWN FOR THE SHOW?

13 A IT'S A VERY ROUGH ONE, I GUESS. I'M SURE THEY  
14 HAD MORE STUFF THAT THEY WERE LOOKING AT WHEN THEY  
15 WERE...

16 Q AND I -- CAN YOU GET THE WHOLE THING ON THE  
17 SCREEN?

18 PERHAPS -- CAN YOU SEE THAT, MS. JOHNSON, I DON'T HAVE A  
19 PRAYER, BUT...

20 A YES.

21 Q OKAY. AND CAN YOU TELL BY LOOKING AT THIS HOW  
22 MUCH OF THE -- LET ME ASK YOU THIS FOUNDATIONAL QUESTION  
23 BEFORE WE GO THERE.

24 WHAT IS A RUNDOWN OF THE SHOW? WHAT IS THAT  
25 SHOWING?

26 A THE WHICH -- WAIT, WHAT?

27 Q WHAT DOES THIS SHOW, WHAT'S ON THE SCREEN NOW?

28 A IT'S SHOWING WHO THE HOSTS ARE, WHAT TIME WE'LL

1 HAVE AN INTERCHANGE BEFORE COMMERCIALS.

2 Q AND DOES THIS SHOW THE ACTUAL SEGMENTS THAT WERE  
3 ON THE SHOW THAT DAY?

4 A I WOULD GUESS SO, YES.

5 Q OKAY. ARE YOU FAMILIAR WITH THIS DOCUMENT? DID  
6 YOU USED TO SEE THESE BEFORE THE SHOWS?

7 A I WOULD SEE A LOT OF THEM, BUT MOST OF THE TIME I  
8 WOULD DISREGARD THEM BECAUSE THEY HAD NOTHING TO DO WITH  
9 ME.

10 Q OKAY. AND CAN YOU TELL FROM LOOKING AT THIS  
11 DOCUMENT WHAT PERCENT OR HOW MUCH OF THE SEVERAL HOUR  
12 LONG SHOW WAS DEVOTED TO THE TOPICS MR. GOLDBERG ASKED  
13 YOU ABOUT, POLITICS AND NEWS, AND SO FORTH?

14 A YEAH, LIKE NONE OF IT REALLY.

15 Q YEAH.  
16 AND HOW MUCH OF IT WAS DEVOTED TO THE BATTLECAMER AND  
17 THE MORE EXTREME MATERIAL THAT WE'VE TALKED ABOUT?

18 A WELL, THE BATTLECAMERS ARE PRETTY MUCH ON IT THE  
19 ENTIRE TIME.

20 Q OKAY.

21 A SO AT LEAST 50 PERCENT OF THE SHOW THERE WAS  
22 BATTLECAMERS INVOLVED.

23 Q OKAY. SO IF WE GO DOWN -- CAN YOU GO DOWN TO IT  
24 AND BLOW THAT UP, PLEASE.

25 OKAY. AND I'M SORRY, BEAR WITH ME ONE MINUTE.

26 OKAY. AND DO YOU SEE WHERE IT SAYS "THE SCOOP"?

27 A UM-HMM.

28 Q WHAT DOES THAT MEAN, IF YOU KNOW?

1 A I HAVE NO IDEA.

2 Q OKAY. WAS THAT THE KIND OF MATERIAL WE SAW ON  
3 THAT LIST THAT YOU COULD CHOOSE AS A HOST THE TOPICS  
4 FROM, POLITICS AND SO FORTH?

5 A YEAH, IT'S PROBABLY, LIKE, PICK UP SOMETHING AND  
6 TALK ABOUT IT FOR --

7 Q OH, OKAY.

8 A -- FOR THOSE TEN MINUTES, THEY'RE GOING TO SIT  
9 THERE AND INTERACT WITH BATTLECAMERS.

10 Q OH, OKAY.

11 A THE NEXT ONE IS GOING TO TALK ABOUT --

12 HON. T.A. GREEN: GUYS, YOU'RE TALKING OVER EACH  
13 OTHER.

14 MS. GAROFALO: I'M SORRY, YOUR HONOR.

15 HON. T.A. GREEN: NO. DO YOU WANT TO FINISH YOUR  
16 ANSWER?

17 THE WITNESS: THEN LIKE THE SCOOP, I'M GUESSING  
18 IS WHEN THEY WOULD TALK ABOUT THE DIFFERENT TOPICS THAT  
19 THEY COULD CHOOSE FROM -- FROM THAT LIST.

20 HON. T.A. GREEN: OKAY. YOUR TURN.

21 MS. GAROFALO:

22 Q AND CAN YOU TELL FROM LOOKING AT THIS HOW MUCH  
23 TIME IN THE OVERALL SHOW WAS DEVOTED TO THE TOPICS OTHER  
24 THAN THE EXTREME MATERIAL THAT'S BEEN DESCRIBED?

25 A I GUESS, NO, NONE.

26 Q ABOUT TEN MINUTES?

27 MR. GOLDBERG: OBJECTION, YOUR HONOR, SHE'S  
28 PUTTING WORDS IN HER MOUTH.

1 HON. T.A. GREEN: OVERRULED. OVERRULED.

2 MS. GAROFALO: CAN YOU GET THE TIME ON THE SIDE,  
3 MR. KALTGRAD.

4 MR. KALTGRAD: I'VE LOST THE CONNECTION.

5 MS. GAROFALO: YEAH, WE'VE LOST THE CONNECTION, I  
6 APOLOGIZE.

7 THE WITNESS: WELL, ABOUT -- THE FIRST ONE I'M  
8 TALKING WITH BATTLECAMERS, YOU KNOW, THAT ONE WAS TAKING  
9 PHONE CALLS FROM BATTLECAMERS, BATTLECAMERS,  
10 BATTLECAMERS. SO EVERYTHING BESIDE THE ONE THING THAT  
11 SAYS THAT IS NEXT TO THE SCOOP INVOLVES THE  
12 BATTLECAMERS.

13 MS. GAROFALO:

14 Q OKAY. JUST BEAR WITH US FOR ONE SECOND. WHILE  
15 MR. KALTGRAD IS DOING THAT, LET ME JUST ASK YOU MY NEXT  
16 QUESTION. YOU -- THERE YOU GO. AND YOU MAY BE ABLE TO  
17 SEE THAT.

18 DO YOU SEE OVER TO THE LEFT, THERE'S A COLUMN  
19 WITH WHAT LOOKS LIKE NUMBERS?

20 A UM-HMM.

21 Q AND WHAT DO THOSE NUMBERS TELL US, IF YOU KNOW?

22 A YOU MEAN THE FIRST COLUMN?

23 Q WELL, FIRST THE COLUMN --

24 A IT'S LIKE --

25 Q COMMERCIAL, COMMERCIAL, COMMERCIAL; RIGHT?

26 A YEAH.

27 Q AND WHAT DOES THAT COLUMN MEAN?

28 A THE DIFFERENT SEGMENTS THAT ARE GOING TO BE IN

1 THE SHOW.

2 Q OKAY. AND NEXT TO THAT COLUMN UP ABOVE THE  
3 COLUMN UNDER TIME, WHAT IS THAT?

4 A THE TIME THAT THEY ARE GOING TO BE SHOOTING THAT  
5 SEGMENT IN.

6 Q OKAY. SO FOR ANY PARTICULAR SEGMENT, WE COULD  
7 JUST LOOK AT THE TIME ON THE LEFT; CORRECT?

8 A UM-HMM.

9 MS. GAROFALO: CAN YOU GO BACK TO THE SCOOP, MR.  
10 KALTGRAD.

11 AHH. THERE WE GO. THERE'S ONE, "POP TALK."

12 Q AND WHAT WAS POP TALK, IF YOU KNOW?

13 A I HAVE NO IDEA BECAUSE I --

14 MR. GOLDBERG: OBJECTION. ANYTHING AFTER "I  
15 DON'T KNOW."

16 HON. T.A. GREEN: NO, YOU CAN SAY WHY YOU DON'T  
17 HAVE ANY IDEA.

18 THE WITNESS: BECAUSE I ALREADY -- WE CAME UP  
19 WITH OUR TOPICS BEFORE, SO I NEVER LOOKED AT THE LIST OF  
20 THINGS THAT WERE OFFERED FOR THEM.

21 MS. GAROFALO:

22 Q OKAY. BUT IS IT CORRECT THAT IF WE LOOK TO THE  
23 SIDE AND I THINK IT SAYS THREE, WHATEVER IT DOES SAY,  
24 THAT THAT'S THE TIME THAT THIS PARTICULAR SEGMENT WAS  
25 ON?

26 A UM-HMM.

27 Q OKAY. NOW, YOU REPEATED SEVERAL TIMES AND YOU  
28 WERE NOT ALLOWED TO RESPOND, YOU SAID YOU DIDN'T

1 ASSOCIATE WITH MS. REEVES.

2 DO YOU RECALL THAT?

3 A YEAH, LIKE, I WOULDN'T LIKE GO TO LUNCH WITH HER  
4 OR ASK HER HOW HER MORNING WAS.

5 Q LET ME JUST ASK MY QUESTION. I JUST WANT YOU TO  
6 TELL US WHAT YOU MEANT BY --

7 A WHY I DON'T ASSOCIATE WITH?

8 Q YES.

9 A LIKE, I DON'T WANT TO GO HANG OUT WITH HER  
10 OUTSIDE OF WORK. I DON'T WANT TO -- I'M NOT GOING TO  
11 MAKE SMALL TALK.

12 Q OKAY. WAS THERE A REASON THAT YOU CHOSE NOT TO  
13 ASSOCIATE WITH MS. REEVES?

14 A THERE'S JUST SOME PEOPLE YOU GET A FEELING ABOUT  
15 AND YOU JUST DON'T NEED THEM IN YOUR LIFE OR WANT TO BE  
16 AROUND THAT TYPE OF PERSON.

17 Q AND WAS MS. REEVES ONE OF THOSE PEOPLE?

18 A I JUST DON'T THINK SHE'S THE MOST EMOTIONALLY  
19 STABLE PERSON AND I THINK A LOT OF THE PEOPLE THAT ARE  
20 SUING HIM RIGHT NOW ARE SCAM ARTISTS.

21 MR. GOLDBERG: OBJECTION, YOUR HONOR. NOW SHE'S  
22 MAKING A MEDICAL DIAGNOSIS.

23 HON. T.A. GREEN: OKAY. EXCUSE ME. I'M SORRY,  
24 WHAT'S THE OBJECTION?

25 MR. GOLDBERG: THE OBJECTION IS THAT SHE HAS NO  
26 BASIS FOR THAT, CALLING MY CLIENT NAMES.

27 HON. T.A. GREEN: NO, NO, NO. OKAY. THE SCAM  
28 ARTIST PART IS OFF THE TABLE, IS OFF YOUR PLATE, BUT

1 SEVERAL TIMES DURING CROSS YOU ELICITED FROM THE WITNESS  
2 THAT SHE DIDN'T ASSOCIATE WITH YOUR CLIENT AND IT'S FAIR  
3 TO ASK WHY, I MEAN...

4 MR. GOLDBERG: THAT'S FINE. AND I THINK SHE'S --  
5 THAT'S FINE, SHE COULD SAY THAT. OKAY. SHE COULD TELL  
6 US WHY.

7 HON. T.A. GREEN: OKAY.

8 MS. GAROFALO:

9 Q AT THE TIME, NOT ANYTHING YOU LEARNED LATER, BUT  
10 AT THE TIME THAT MS. REEVES AND YOU WERE BOTH WORKING AT  
11 EITHER FILMON OR HOLOGRAM --

12 A UM-HMM.

13 Q -- IS THERE A REASON THAT YOU CHOSE NOT TO  
14 ASSOCIATE WITH MS. REEVES?

15 A I WAS JUST BUSY. I HAD A LOT TO DO, SO I JUST --  
16 I DIDN'T CARE FOR ALL THE DRAMA IN THE OFFICE, SO I JUST  
17 DID MY THING.

18 Q OKAY. WAS THERE DRAMA INVOLVING MS. REEVES?

19 A WELL, I JUST DIDN'T WANT TO, LIKE, SIT AROUND AND  
20 TALK ABOUT WHY HER APARTMENT BURNT DOWN, LIKE, I DON'T  
21 CARE. OR ABOUT HER BOYFRIEND WHO, LIKE, I DON'T CARE.

22 Q MS. REEVES TALK ABOUT HER BOYFRIEND IN THE  
23 OFFICE?

24 A YEAH, ABOUT A COMEDIAN BOYFRIEND.

25 MR. GOLDBERG: OBJECTION.

26 HON. T.A. GREEN: WHAT'S THE OBJECTION?

27 MR. GOLDBERG: RELEVANCE.

28 HON. T.A. GREEN: OKAY. YEAH, I THINK WE'RE

1 EXPLORING THE OUTER LIMITS HERE.

2 MS. GAROFALO: OKAY. I HAVE NO FURTHER  
3 QUESTIONS.

4 THANK YOU, MS. JOHNSON.

5

6 RECROSS EXAMINATION

7 MR. GOLDBERG:

8 Q DID MS. REEVES WANT TO HANG AROUND WITH YOU?

9 MS. GAROFALO: OBJECTION, YOUR HONOR.

10 HON. T.A. GREEN: ACTUALLY, THAT CALLS FOR  
11 SPECULATION.

12 MR. GOLDBERG:

13 Q LET'S GO TO PAGE 3 OF EXHIBIT 198.

14 NOW, FIRST OF ALL, THIS HAS A LIST OF TIME THAT  
15 THIS SHOW IS GOING TO BE RUNNING.

16 DO YOU SEE THAT?

17 A YES, I DO.

18 Q AND DOES THIS REFRESH YOUR RECOLLECTION THAT THIS  
19 SHOW RAN FROM 2:00 P.M. TO 7:00 P.M.?

20 A CORRECT.

21 Q YEAH. AND I DON'T SEE YOUR NAME ON HERE.  
22 SO HOW IS THAT YOUR NAME IS NOT ON HERE IF YOU'RE ONE OF  
23 THE HOSTS?

24 A BECAUSE I DIDN'T SHOW THE HOST EVERY DAY.

25 Q SO HOW OFTEN DID YOU HOST A SHOW?

26 A IT WAS, LIKE, ONCE A WEEK.

27 Q OH, OKAY.

28 A BECAUSE I HAD A JOB DOING OTHER THINGS IN THE

1 COMPANY.

2 Q OKAY. THAT'S FINE.

3 SO YOU HOSTED THE SHOW ABOUT ONCE A WEEK; CORRECT?

4 A CORRECT.

5 Q NOW, THE --

6 A HOW COME THE WRITER'S NAME IS IN THE TALENT?

7 HON. T.A. GREEN: OKAY. NO QUESTION. NO  
8 QUESTION.

9 MR. GOLDBERG:

10 Q DID YOU KNOW THE NAMES ON HERE: ELIJAH,  
11 CHRISTINE? DO YOU KNOW WHO THEY WERE?

12 A NO.

13 Q YOU DIDN'T KNOW -- DO YOU KNOW WHO JEN WAS?

14 A NO.

15 Q SO YOU DIDN'T KNOW ANY OF THE OTHER HOSTS; IS  
16 THAT CORRECT?

17 A I KNEW SOME OF THE PEOPLE, YEAH, BUT I WORKED FOR  
18 THE COMPANY, SO I KNEW EVERYBODY RUNNING THE SHOWS.

19 Q RIGHT. BUT DID YOU KNOW ANY OF THE PEOPLE THAT  
20 ARE ON THIS LIST?

21 A NO.

22 MR. GOLDBERG: I HAVE NOTHING FURTHER.

23 HON. T.A. GREEN: ANYTHING ELSE?

24 MS. GAROFALO: JUST VERY BRIEFLY, YOUR HONOR.

25 OKAY. I JUST WANT TO BRING UP EXHIBIT 198 AGAIN.

26 OKAY. JUST MAKE IT SLIGHTLY BIGGER.

27 ///

28 ///

1 FURTHER REDIRECT EXAMINATION

2 MS. GAROFALO:

3 Q OKAY. SO YOU SEE -- AND IF I MAY APPROACH, YOUR  
4 HONOR, SO I CAN --

5 MR. GOLDBERG: I HAVE A HARD COPY IF YOU WANT IT.

6 MS. GAROFALO:

7 Q OKAY. SO IF WE GO DOWN TO THE YELLOW VERSION, DO  
8 YOU SEE WHERE IT SAYS "LAUREN AND JEN"?

9 A UM-HMM.

10 Q "POP TALK, CHAT OVERLAY" AND THEN IT SAYS, "THE  
11 SCOOP, TALK ABOUT ARI'S TOPICS, TAKE PHONE CALLS, CHAT."

12 IF YOU KNOW, IS THAT THE ARI WHO PREPARED THE  
13 LIST OF POTENTIAL TOPICS?

14 A I WOULD THINK SO.

15 Q ALL RIGHT. AND HERE IT APPEARS THAT IT WAS 5  
16 MAYBE 30, 35 MINUTES OF THE SHOW THAT ARI'S TOPICS WERE  
17 SLOTTED IN FOR; IS THAT RIGHT?

18 A YES. YEP.

19 Q OKAY. AND IF YOU GO DOWN JUST UNDER THE LINE, DO  
20 YOU SEE THE DARKENED LINE?

21 A UM-HMM.

22 Q AND THE FIRST ONE SAYS, "ELIJAH AND CHRISTINE,  
23 CHAT OVERLAY, TRASH TALKING AND CHAT WITH PHONE CALLS."

24 DO YOU KNOW WHEN THE COMPANY USED THE WORD "TRASH  
25 TALKING" ON ITS SCHEDULES, WHAT IT WAS REFERRING TO?

26 A PROBABLY WAS BATTLECAMERS. THEY ARE, LIKE, A  
27 BUNCH OF PEOPLE THAT LIKE TO GET ONLINE AND TALK CRAP  
28 ABOUT EACH OTHER. AND SO THEY, LIKE, GET ON THERE AND,

1       LIKE, KIND OF -- IT'S, LIKE, IF YOU JUST PUT A BUNCH OF  
2       PEOPLE IN A ROOM AND THEY COULD ALL SAY WHATEVER THEY  
3       WANTED TO SAY, IT'S KIND OF WEIRD, YEAH.

4           Q   OKAY.  FROM YOUR EXPERIENCE HOSTING, WOULD THE  
5       TRASH TALKING WITH THE BATTLECAMERS TYPICALLY BE A  
6       DISCUSSION ABOUT INTERNATIONAL NEWS?

7           A   SOMETIMES.

8           Q   AND WAS IT TYPICALLY A DISCUSSION MORE ABOUT THE  
9       KINDS OF THINGS YOU TOLD US WERE COVERED ON BATTLECAM?

10          A   UM-HMM.

11           HON. T.A. GREEN:  YES?

12           THE WITNESS:  YEAH.

13          MS. GAROFALO:

14           Q   SORT OF A PERSONAL COMPETITION AS TO WHO COULD BE  
15       MORE GROSS; WOULD THAT BE CORRECT?

16           A   YES.

17           Q   AND LET'S STICK WITH WHEN YOU HOSTED BATTLECAM  
18       LIVE.

19           HOW MUCH OF THE SHOW WOULD YOU ESTIMATE WAS  
20       DEVOTED TO TRASH TALKING?

21           A   IT WASN'T MUCH TRASH TALKING.  IT WAS -- I LIKED  
22       IT WHEN THEY INTERACTED BECAUSE IT GAVE SOMETHING --  
23       THEY GAVE SOMETHING INTERESTING TO THE SHOWS.  AND THEY  
24       KIND OF LIKED IT WHEN YOU WOULD JUST KIND OF TALK BATTLE  
25       WITH THEM AND LIKE STAND UP -- LIKE WHAT LAWYERS DO.  
26       LIKE, THEY LIKE TO BATTLE BACK AND FORTH WITH YOU.  
27       THAT'S PRETTY MUCH WHAT THEY MEANT BY TRASH TALKING.

28          MS. GAROFALO:  OKAY.  I HAVE NO FURTHER

1 QUESTIONS.

2

3

FURTHER CROSS EXAMINATION

4

MR. GOLDBERG:

5

Q JUST TO CLARIFY. YOU KNOW, IF YOU LOOK AT THAT  
6 LIST, JUST THE ONE THAT'S RIGHT UP THERE.

6

7

COULD WE PUT IT BACK UP, 198.3.

8

9

10

11

12

13

14

15

YOU KNOW, IT LOOKS LIKE THAT DAY WHEN LAUREN AND  
JEN ARE ON, THEY ARE TALKING TO THE BATTLECAMERS FROM  
2:10 TO 2:35. AND THEN FROM 2:35 TO 3:05, EACH HOST  
PICKS THREE ITEMS TO TALK ABOUT WITH THE CHATTER. THEN  
FROM 3:05 TO 3:35, THEY TALK ABOUT THE SCOOP. THEN FROM  
3:35 TO 4:05, THEY TALK ABOUT ARI'S TOPICS AND SCOOP,  
THEN THEY TALK ABOUT -- TO THE BATTLECAMERS TOWARD THE  
END.

16

17

DOES THAT SEEM TO BE ABOUT THE WAY YOUR SHOW WAS  
STRUCTURED AS WELL?

18

A NO.

19

Q OKAY.

20

MR. GOLDBERG: NOTHING FURTHER.

21

THE WITNESS: WE WANTED -- OKAY.

22

MS. GAROFALO: NOTHING FURTHER, YOUR HONOR.

23

HON. T.A. GREEN: OKAY. YOU'RE EXCUSED. THANK  
24 YOU FOR BEING HERE.

25

THE WITNESS: YEAH, THANK YOU.

26

HON. T.A. GREEN: OKAY. DEFENSE.

27

MR. GOLDBERG: WELL, WE ARE RESUMING THE CROSS OF  
28 DR. MEYER.

1 HON. T.A. GREEN: OKAY. WE'RE -- TECHNICALLY  
2 WE'RE BACK ON THE PLAINTIFF'S CASE, BUT IT'S THE DEFENSE  
3 CROSS OF THE DOCTOR.

4 MR. GOLDBERG: YEAH.

5 HON. T.A. GREEN: JUST TO REORIENT OURSELVES.

6 MR. DAVID: DO YOU WANT ME BACK?

7 HON. T.A. GREEN: NO. I'M SORRY. NO, THE DOCTOR  
8 IS ON NOW.

9 MR. DAVID: OH, OKAY. WHEN DO YOU NEED ME?

10 HON. T.A. GREEN: WELL, WE COULD BE REALLY  
11 PRESSED, WE NEED TO GET DONE WITH THE DOCTOR TODAY. HOW  
12 DO YOU WANT TO ADVISE YOUR CLIENT?

13 MS. GAROFALO: DON'T THINK SO. I MEAN, IF WE RUN  
14 FIVE OR TEN MINUTES SHORT, I'M GOING TO TRY TO GET  
15 THROUGH THIS, I JUST DON'T KNOW.

16 HON. T.A. GREEN: THEN I GET TO BE FIVE OR TEN  
17 MINUTES EARLIER.

18 MS. GAROFALO: EARLIER. SPEND MORE TIME --

19 HON. T.A. GREEN: OKAY. DOCTOR, YOU'RE WELCOME  
20 BACK, HAVE A SEAT, YOU'RE STILL UNDER OATH.

21 MR. GOLDBERG: DID WE ADMIT THAT LAST EXHIBIT?

22 MS. LEAL: I BELIEVE WE DID. DID WE ADMIT THE  
23 LAST EXHIBIT?

24 MR. GOLDBERG: YOUR HONOR, THE EXHIBIT THAT WE  
25 SHOWED THE WITNESS AND THAT WE SHOWED THE JURY, I WOULD  
26 ASK THAT IT BE ADMITTED. WHAT NUMBER IS IT?

27 THE CLERK: I DON'T HAVE A NUMBER.

28 MR. GOLDBERG: I BELIEVE IT WAS 230; RIGHT?

1 HON. T.A. GREEN: OKAY. WE ALREADY SHOWED THE  
2 JURY, SO IT WILL BE...

3 MR. GOLDBERG: IT WILL BE EXHIBIT 230, YOUR  
4 HONOR.

5 HON. T.A. GREEN: ALL RIGHT. 230.

6  
7 (EXHIBIT 230 ADMITTED INTO EVIDENCE)

8  
9 MR. GOLDBERG: OKAY. DR. MEYER, PLEASE DON'T  
10 COMMUNICATE WITH THE JURY.

11 THE WITNESS: I JUST FOUND A HAT. I JUST DIDN'T  
12 KNOW WHOSE IT WAS.

13 MS. GAROFALO: OH. FINDERS KEEPERS.

14 THE WITNESS: NO, IT SAYS KEEPERS, THAT'S NOT FOR  
15 ME.

16 HON. T.A. GREEN: OH, THANK YOU. A PERK OF THE  
17 JOB.

18  
19 CROSS EXAMINATION (RESUMED)

20 MS. GAROFALO:

21 Q OKAY. SO I BELIEVE THAT WHERE WE LEFT OFF, SEEMS  
22 LIKE A LIFETIME AGO, WE WERE DISCUSSING HOW YOUR VIEW OF  
23 MS. REEVES' TESTIMONY AND OTHER TESTIMONY HAD ALTERED  
24 THE OPINIONS YOU WERE PROVIDING HERE.

25 DO YOU RECALL THAT?

26 A I DON'T RECALL THAT. I REMEMBER HAVING THE  
27 DISCUSSION ABOUT THAT, BUT THAT'S NOT HOW I RECALL IT.

28 Q OKAY. AND YOU TOLD US THAT YOU READ MR.

1 WEISMAN'S TESTIMONY AND IT MADE YOU REALIZE HOW -- HOW  
2 -- I FORGET THE EXACT WORD YOU USED, I APOLOGIZE, BUT  
3 HOW EXTREME THE ASSAULTS WERE ON MS. REEVES.

4 DO YOU RECALL THAT?

5 A YES, I DO RECALL THAT.

6 Q OKAY.

7 AND YOU DID TELL US THAT MR. WEISMAN -- READING MR.  
8 WEISMAN AND MS. REEVES' TESTIMONY PROVIDED YOU  
9 INFORMATION THAT YOU HAD NOT PREVIOUSLY HAD; CORRECT?

10 A CORRECT.

11 Q AND THAT INFORMATION INCLUDED CERTAIN SPECIFIC --  
12 STRIKE THAT.

13 THAT INFORMATION INCLUDED CERTAIN FACTS RELATING  
14 TO MS. REEVES' ALLEGATIONS IN THIS CASE; CORRECT?

15 A CORRECT. ASSUMING THEY WERE FACTS. YOU  
16 QUESTIONED THAT, SO BUT...

17 Q OKAY. OKAY.

18 A REPORTS.

19 Q I'M GLAD SOMEBODY REMEMBERS WHAT I SAY.

20 OKAY. SO THERE WERE CERTAIN INCIDENTS, I  
21 BELIEVE, LIKE THE ONE WHERE MR. WEISMAN SAID THAT MS.  
22 REEVES WAS CHOKING.

23 DO YOU RECALL THAT?

24 A I DO.

25 Q OKAY. AND I'M SORRY IF I MISSED THIS, BUT  
26 READING MS. REEVES' TESTIMONY, HOW DID IT CHANGE YOUR  
27 PERCEPTION OF HER DIAGNOSIS?

28 A IN NO WAY DID IT CHANGE MY PERCEPTION OF HER

1           DIAGNOSIS.

2           Q   AND DID YOU CHANGE YOUR TESTIMONY HERE IN ANY  
3           WAY?

4           A   NO.

5           Q   OKAY.   SO THIS IS THE SAME TESTIMONY YOU WOULD  
6           HAVE GIVEN BEFORE YOU READ MS. REEVES' TESTIMONY AND THE  
7           TESTIMONY OF OTHER WITNESSES; CORRECT?

8           A   REGARDING HER DIAGNOSIS, YES.

9           Q   OKAY.   AND HOW ABOUT REGARDING HER PROGNOSIS?  
10          ANY EFFECT?

11          A   NO.

12          Q   NOW, YOU TOLD US THAT THE TESTIMONY THAT YOU READ  
13          WAS PROVIDED TO YOU BY MS. REEVES' COUNSEL.

14          DO YOU RECALL THAT?

15          A   YES.

16          Q   AND THAT MS. REEVES' COUNSEL TOLD YOU IT WASN'T  
17          NECESSARY TO READ MR. DAVID'S DEPOSITION TESTIMONY;  
18          CORRECT?

19          A   CORRECT.

20          Q   AND THAT YOU READ A LITTLE BIT OF MR. DAVID'S  
21          TRIAL TESTIMONY BECAUSE IT WAS IN THE SAME BOOKLET --  
22          THE SAME TRANSCRIPT AS MS. REEVES; CORRECT?

23          A   CORRECT.

24          Q   DON'T YOU THINK IT WOULD HAVE BEEN IMPORTANT TO  
25          SEE BOTH SIDES OF THE EVIDENCE BEFORE TESTIFYING?

26          A   WELL, THAT WAS WHY I INITIALLY REQUESTED HIS  
27          DEPOSITION TESTIMONY.

28          Q   BUT YOU WERE TOLD IT WASN'T IMPORTANT TO READ;

1 CORRECT?

2 A IT WAS NOT NECESSARY. AND YOU MIGHT RECALL, I  
3 WAS ON VACATION AT THE TIME, SO I WAS NOT REALLY EAGER  
4 TO SPEND A LONG AMOUNT OF TIME ON THIS IF IT WASN'T  
5 NECESSARY.

6 Q SO YOU WERE TOLD IT WAS NOT NECESSARY. YOU WERE  
7 TOLD BY COUNSEL THAT IT WAS NOT NECESSARY FOR YOU TO  
8 CONSIDER THE OTHER SIDE OF THE STORY PRIOR TO YOUR  
9 TESTIMONY; CORRECT?

10 A CORRECT.

11 Q AND ISN'T IT POSSIBLE, DR. MEYER, THAT YOU MIGHT  
12 HAVE FOUND OR DISCOVERED FACTS IN TESTIMONY FAVORABLE TO  
13 MR. DAVID THAT YOU HAD NOT KNOWN FROM WHAT MS. REEVES  
14 TOLD YOU?

15 A THERE COULD BE ALL KINDS OF THINGS, CORRECT.

16 Q AND ISN'T IT POSSIBLE THAT THOSE FACTS MAY HAVE  
17 CHANGED YOUR PERCEPTION OF THE ACCURACY OF THE THINGS  
18 MS. REEVES TOLD YOU DURING HER SESSIONS WITH YOU?

19 A NO -- UNLIKELY, VERY UNLIKELY.

20 Q UNLIKELY BECAUSE THE OTHER SIDE OF THE STORY  
21 DIDN'T MATTER?

22 A NO, BECAUSE SHE WAS MY CLIENT.

23 Q OKAY.

24 A AND I KNEW HER QUITE WELL.

25 Q SO IF YOU READ THE TESTIMONY OF THREE OR FOUR  
26 PEOPLE WHO SAID THAT SOMETHING MS. REEVES TOLD YOU WAS  
27 INACCURATE, YOU WOULD HAVE BELIEVED MS. REEVES?

28 A I CAN'T SAY THAT. THAT'S A HYPOTHETICAL.

1 Q NOW, YOU KNEW THAT MS. REEVES WORKED OR AT LEAST  
2 ATTEMPTED TO WORK AS AN ACTRESS; CORRECT?

3 A CORRECT.

4 Q AND I BELIEVE THAT ONE OF THE THINGS YOU SAID  
5 DURING THE DEPOSITION WAS THAT ONE OF MS. REEVES' COPING  
6 MECHANISMS AS A CHILD -- YOU RECALL WE TALKED ABOUT WHAT  
7 I CALL ABUSE SHE SUFFERED AS A CHILD?

8 A I DO RECALL.

9 Q OKAY. AND YOU TOLD US THAT ONE OF THE COPING  
10 MECHANISMS WAS TO DENY; CORRECT?

11 A CORRECT.

12 Q DENY REALITY; CORRECT?

13 A NO, NOT DENY REALITY.

14 Q DENY THE EMOTIONS THAT SHE SUFFERED AS A RESULT  
15 OF THE REALITY; CORRECT?

16 A YES.

17 Q AND THAT PRE --

18 A BIG DISTINCTION.

19 Q AND THAT PRETENSE WAS ANOTHER COPING MECHANISM;  
20 ISN'T THAT CORRECT?

21 A NO, THAT'S INCORRECT. I DON'T BELIEVE I USED  
22 THAT WORD AT ALL.

23 Q OKAY. I WANT TO GO BACK FOR A MINUTE BECAUSE I  
24 DON'T THINK WE FINISHED ABOUT MS. -- TO MS. REEVES'  
25 TESTIMONY THAT BY DECEMBER 2017 OR THEREABOUTS, SHE WAS  
26 SUICIDAL.

27 DO YOU RECALL THAT?

28 A I DO.

1 Q AND YOU READ THAT IN MS. REEVES' TESTIMONY, DID  
2 YOU NOT?

3 A ACTUALLY, I MADE A DISTINCTION. SHE SAID SHE  
4 WANTED TO DIE, WHICH IS DIFFERENT THAN BEING SUICIDAL.

5 Q MS. REEVES' DEPOSITION TESTIMONY -- WELL, STRIKE  
6 THAT.

7 MS. REEVES' TRIAL TESTIMONY, YOU READ THAT;  
8 CORRECT?

9 A CORRECT.

10 Q AND MS. REEVES TALKED ABOUT BEING SUICIDAL IN  
11 DECEMBER 2016.

12 DO YOU RECALL THAT?

13 A I DO. BUT YOU ACTUALLY SAID 2017 WHEN YOU  
14 INTRODUCED THIS.

15 Q I AM SORRY, I MIX UP THE YEARS ALL THE TIME.  
16 THANK YOU.

17 OKAY. 2016.

18 AND THAT SHE HAD, IN FACT, PLANNED IT OUT AND  
19 CHOSEN A PLACE TO DRIVE A CAR OFF A CLIFF.

20 DO YOU RECALL THAT?

21 A I DO.

22 Q AND YOU ALSO TOLD US THAT THAT WAS SOMETHING SHE  
23 DIDN'T TELL YOU BECAUSE SHE MAY NOT HAVE TRUSTED YOU  
24 SUFFICIENTLY AT THE TIME; CORRECT?

25 A THAT WAS ONE REASON. I PUT FORTH ANOTHER REASON  
26 AS WELL.

27 Q AND WHAT WAS THE SECOND REASON?

28 A WAS THAT WHEN I START WITH A CLIENT, I LET THEM

1 KNOW THE LIMITS OF CONFIDENTIALITY AND ONE OF THE LIMITS  
2 WAS KEEPING SOMETHING PRIVATE IS IF SOMEONE'S A DANGER  
3 TO THEMSELVES OR OTHERS, THEN I MIGHT NOT KEEP IT  
4 PRIVATE, SO THAT WOULD BE ANOTHER MOTIVATION TO NOT TELL  
5 ME.

6 Q OKAY. SO IF I UNDERSTANDING YOU CORRECTLY, WHEN  
7 YOU BEGAN TREATING MS. REEVES IN 2016, LATE 2016, YOU  
8 TOLD HER THAT YOU COULDN'T KEEP CONFIDENTIAL ANYTHING  
9 SHE TOLD YOU ABOUT WANTING TO HARM HERSELF; IS THAT  
10 CORRECT?

11 A NO, I TOLD HER I COULD -- HAD A LEGAL OBLIGATION  
12 TO SPEAK OUT IF I THOUGHT SHE WAS IN DANGER OF HURTING  
13 HERSELF, WHICH IS A LITTLE DIFFERENT THAN WHAT YOU SAID.

14 Q DID YOU TELL HER THAT IN THE VERY FIRST SESSION  
15 OF DECEMBER OF 2016?

16 A YES.

17 Q OKAY. AND DO YOU THINK BASED ON THAT THERE MAY  
18 HAVE BEEN OTHER THINGS MS. REEVES DIDN'T DISCLOSE TO  
19 YOU?

20 A I DON'T KNOW.

21 Q MS. REEVES DID NOT TELL YOU, HER PSYCHOLOGIST,  
22 THAT SHE WAS CONTEMPLATING SUICIDE; ISN'T THAT CORRECT?

23 A AS OF SESSIONS ONE AND TWO, CORRECT.

24 Q OTHER THAN AT ONE POINT SAYING SOMETIMES SHE FELT  
25 SHE'D LIKE TO DIE, DID MS. REEVES EVER TELL YOU THAT SHE  
26 WAS ACTUALLY CONTEMPLATING SUICIDE?

27 A NO.

28 Q SO, LET'S SAY, A YEAR LATER, MS. REEVES DIDN'T

1 SAY, BY THE WAY, I DIDN'T TELL YOU THIS THEN, BUT BACK  
2 IN 2016, I HAD ACTUALLY PICKED A CLIFF TO DRIVE OFF?  
3 NEVER TOLD THAT YOU; RIGHT?

4 A CORRECT.

5 Q AND, OF COURSE, AS YOU SIT HERE TODAY, YOU DON'T  
6 KNOW WHAT ELSE MS. REEVES KEPT FROM YOU, DO YOU?

7 A CORRECT.

8 Q AND IN YOUR TREATMENT OF MS. REEVES, YOU -- WELL,  
9 STRIKE THAT.

10 YOU TOLD US THAT MUCH OF YOUR TREATMENT IS BASED  
11 ON OBSERVATION.

12 A CORRECT.

13 Q OKAY. AND THAT WOULD BE OBSERVING THE PATIENT  
14 AND DRAWING CERTAIN CONCLUSIONS; CORRECT?

15 A IN CONJUNCTION WITH WHAT THEY SAY.

16 Q AND YOU NEVER OBSERVED THAT MS. REEVES WAS SO IN  
17 DISTRESS THAT SHE WAS SUICIDAL; ISN'T THAT CORRECT?

18 A I DON'T KNOW THAT THAT'S SOMETHING A PERSON CAN  
19 OBSERVE. I CERTAINLY OBSERVED THAT SHE WAS VERY  
20 DEPRESSED. I DON'T THINK YOU CAN OBSERVE IF SOMEBODY  
21 WANTS TO KILL THEMSELVES VISUALLY.

22 Q ALL RIGHT.

23 A UNLESS THERE'S A WEAPON AND THEN, YEAH.

24 Q AND IN LATE 2016, EARLY 2017, YOUR OBSERVATIONS  
25 OF MS. REEVES AND WHAT MS. REEVES WAS TELLING YOU DID  
26 NOT CAUSE YOU TO BE ALARMED THAT MS. REEVES WAS  
27 CONTEMPLATING SUICIDE; ISN'T THAT RIGHT?

28 A THAT'S CORRECT.

1 Q BECAUSE IF YOU THOUGHT THAT MS. REEVES WAS  
2 CONTEMPLATING SUICIDE, THAT WAS SOMETHING YOU WOULD HAVE  
3 TO TAKE MEASURES TO ADDRESS SUCH AS REPORTING IT,  
4 GETTING MEDICAL HELP, WHAT WOULD YOU HAVE TO DO?

5 A I WOULDN'T HAVE TO DO ANYTHING. THE FIRST THING  
6 I WOULD DO IS DISCUSS IT WITH HER AND THEN WE WOULD MAKE  
7 A PLAN AND USUALLY WE'D MAKE A PACT, WHETHER SHE HAD  
8 IMPULSES AND URGES THAT SHE WOULD CONTACT ME, WE WOULD  
9 MAKE A PLAN TO TRY TO KEEP HER SAFE. IF I FELT THAT WAS  
10 NOT GOING TO -- IF SHE WASN'T CREDIBLE OR WE COULDN'T DO  
11 THAT, WELL, THEN I WOULD GO SOMEWHERE ELSE.

12 Q OKAY. SO A FEW MINUTES AGO -- A FEW MOMENTS AGO,  
13 YOU TOLD ME THAT YOU EXPLAINED TO MS. REEVES THAT YOU  
14 COULDN'T KEEP IT CONFIDENTIAL IF YOU FELT --

15 A UM-HMM.

16 Q -- SHE WAS A DANGER TO HERSELF OR OTHERS;  
17 CORRECT?

18 A COULDN'T NECESSARILY, YES. I WAS ALLOWED TO  
19 BREAK CONFIDENTIALITY.

20 Q OH, OKAY.  
21 AND THAT'S WHAT YOU EXPLAINED TO MS. REEVES?

22 A WELL, AGAIN, YES, THAT'S WHAT I TYPICALLY EXPLAIN  
23 TO SOMEBODY WHO COMES INTO MY OFFICE SO THEY UNDERSTAND  
24 THE LIMITS OF THEIR PRIVACY.

25 Q AND AT ANY POINT IN TIME, DID YOU BELIEVE THAT  
26 MS. REEVES WAS IN IMMINENT DANGER OF COMMITTING SUICIDE?

27 A NO, I DID NOT BELIEVE SHE WAS IN IMMINENT DANGER.

28 Q NOW, I WANT TO TALK A LITTLE BIT ABOUT A WORD YOU

1 USED, "HYPERVIGILANT."

2 DO YOU RECALL THAT?

3 A I DO.

4 Q OKAY. AND HYPERVIGILANT, TELL US WHAT  
5 HYPERVIGILANT MEANS IN WORDS THAT WE CAN ALL UNDERSTAND.

6 A WELL, BEING VIGILANT IS BEING CAUTIOUS AND  
7 HYPERVIGILANT IS BEING VERY, VERY CAUTIOUS -- OVERLY  
8 CAUTIOUS.

9 Q AND IS IT YOUR PROFESSIONAL OPINION THAT WHEN MS.  
10 REEVES WAS UNDERGOING WHAT YOU DESCRIBED IN YOUR NOTES  
11 AS WHIPPINGS AND HARSH PUNISHMENT FROM HER FATHER, THAT  
12 SHE WAS HYPERVIGILANT AS A RESULT?

13 A AT THAT TIME? I DON'T KNOW.

14 Q YOU DON'T KNOW. OKAY.

15 SAME QUESTION FOR WHEN SHE WAS BEING PHYSICALLY  
16 AND EMOTIONALLY ABUSED BY T.J.

17 DID SHE REACT WITH HYPERVIGILANCE?

18 A NO, I DON'T THINK SHE DID AT THAT POINT.

19 Q AND YOU DIDN'T KNOW MS. REEVES AT THE TIME?

20 A NO.

21 Q SO WHAT DO YOU BASE THAT ON?

22 A OUR CONVERSATIONS AND THE FACT THAT SHE SEEMED,  
23 IF ANYTHING, TO BE ON THE OTHER EXTREME, LESS VIGILANT  
24 THAN WOULD HAVE BEEN ADAPTED.

25 Q AND THAT'S WHAT SHE TOLD YOU?

26 A THAT WAS MY CLINICAL IMPRESSION.

27 Q OKAY. BUT YOU DIDN'T TREAT HER AT THE TIME THAT  
28 SHE WAS WITH T.J. OR SHORTLY THEREAFTER; CORRECT?

1 A CORRECT.

2 Q OKAY. SO IF SHE TOLD YOU SHE WAS NOT  
3 HYPERVIGILANT AFTER LEAVING T.J., YOU WOULDN'T KNOW  
4 WHETHER THAT WAS TRUE OR NOT, WOULD YOU?

5 A NO, SHE DIDN'T TELL ME SHE WASN'T HYPERVIGILANT.  
6 THIS IS, AGAIN, MY PROFESSIONAL OPINION. LISTENING TO  
7 HER TALK ABOUT HOW SHE WAS AT THAT TIME, IT SEEMED TO ME  
8 -- HER -- SHE WAS IGNORING DANGER RATHER THAN OVERLY  
9 ALERT TO DANGER IN MANY RESPECTS.

10 Q OKAY. SO AFTER T.J. AND AFTER HER EXPERIENCES AS  
11 A CHILD, YOU DON'T BELIEVE SHE SUFFERED HYPERVIGILANCE  
12 UNTIL AFTER SHE LEFT FILMON; IS THAT CORRECT?

13 A CORRECT.

14 Q OKAY. AND WHEN A PATIENT IS IN DENIAL AND I  
15 THINK YOU TOLD US THAT SHE WAS IN DENIAL BEFORE SHE CAME  
16 TO FILMON WITH RESPECT TO THE WAY SHE HAD BEEN TREATED  
17 AS A CHILD; CORRECT?

18 A NO, YOU KEEP MISCHARACTERIZING THAT. I SAID SHE  
19 WAS DENYING HER FEELINGS. SHE WASN'T IN DENIAL ABOUT  
20 WHAT HAPPENED. I THINK SHE WAS DENYING THE INTENSITY OF  
21 HER FEELINGS. THAT'S A BIG DIFFERENCE. IN DENIAL MEANS  
22 IT DIDN'T HAPPEN. SHE WAS QUITE CLEAR ABOUT WHAT  
23 HAPPENED OR SHE DESCRIBED THINGS QUITE CLEARLY. IT WAS  
24 THE IMPACT THAT IT SEEMS SHE WAS NOT CONNECTING TO.

25 Q HERE'S WHAT I'D LIKE YOU TO EXPLAIN.

26 HOW DO YOU KNOW THAT MS. REEVES WAS NOT IN DENIAL  
27 ABOUT ADDITIONAL BEATINGS BY HER FATHER, ADDITIONAL  
28 ABUSE, THINGS SHE DID NOT TELL YOU ABOUT, BUT WAS NOT

1 RECOGNIZING, WAS IN DENIAL OVER?

2 A SO I'VE BEEN WORKING WITH VICTIMS FOR 40 YEARS, I  
3 HAVE TWO ADVANCED DEGREES, I WENT TO ONE OF THE BEST  
4 UNIVERSITIES IN THE COUNTRY, I'M A VERY, VERY SERIOUS  
5 PERSON WHEN IT COMES TO MY WORK AND I HAVE A LOT OF  
6 EXPERIENCE IN THIS REALM.

7 SO I'M RELYING ON MY PROFESSIONAL JUDGMENT WHEN I MAKE  
8 THOSE STATEMENTS.

9 Q OKAY. AND GIVEN YOUR VERY IMPRESSIVE RESUME, IT  
10 WAS FORTUNATE THAT MS. REEVES GOT TO YOU INSTEAD OF  
11 SOMEBODY ELSE FOR TREATMENT; CORRECT?

12 A I MEAN, SHE MIGHT HAVE BEEN ABLE TO GET TO  
13 SOMEONE BETTER THAN ME, I CAN'T SAY THAT FOR SURE, BUT  
14 SHE CERTAINLY COULD HAVE GOTTEN SOMEONE WORSE THAN ME.

15 Q OKAY. BUT IF SOMEBODY IS IN THE CONDITION MS.  
16 REEVES REPORTED SHE WAS IN --

17 A UM-HMM.

18 Q -- YOU'RE THE ONE TO GO TO, AREN'T YOU?

19 A I WOULD SAY THAT I AM AN EXPERT IN THIS AREA,  
20 YES.

21 Q AND THAT'S BECAUSE YOUR EXPERIENCE AND YOUR  
22 TRAINING MAKE YOU ABLE TO BETTER TREAT A PATIENT --

23 A UM-HMM.

24 Q -- SUFFERING MS. REEVES' ALLEGED SYMPTOMS;  
25 CORRECT?

26 A I WOULD DISPUTE THE ALLEGED.

27 Q CAN YOU ANSWER MY QUESTION?

28 A WELL, IF YOU TOOK OUT ALLEGED, I WOULD AGREE.

1 Q OKAY. AND, IN FACT, YOU MADE SIGNIFICANT  
2 PROGRESS WITH MS. REEVES, DID YOU NOT?

3 A I THINK SO.

4 Q OKAY. AND WE'RE GOING TO GO BACK TO THAT IN A  
5 MINUTE AND TALK ABOUT WHAT YOU TALKED ABOUT, BUT I WANT  
6 TO DISCUSS SOMETHING ELSE FIRST.

7 WHAT IS TRANSFERENCE?

8 A TRANSFERENCE IS A PHENOMENON IN WHICH EXPERIENCES  
9 THAT YOU HAVE AS A CHILD WITH THE PEOPLE WHO YOU GROW UP  
10 WITH CREATE ASSUMPTIONS ABOUT HOW PEOPLE ARE AND THEN  
11 YOU TRANSFER THOSE ASSUMPTIONS ABOUT HOW PEOPLE ARE TO  
12 OTHER PEOPLE THAT YOU MEET.

13 Q OKAY. IS THAT DIFFERENT FROM PROJECTING?

14 A YES, IT IS.

15 Q IS THERE A WAY YOU CAN EXPLAIN THE DIFFERENCE?

16 A SO IN TRANSFERENCE, LET'S SAY, YOU GROW UP AND  
17 YOU'VE GOT A REALLY STRICT FATHER, OKAY. AND HE'S VERY  
18 AUTHORITARIAN AND YOU, THEREFORE, WHEN YOU SEE SOME --  
19 ANOTHER MAN, YOU IMAGINE THAT HE MIGHT BE THE SAME WAY  
20 OR MIGHT HAVE HARSH PROCLIVITIES -- TENDENCY.

21 WITH PROJECTION, IT'S THAT YOU HAVE A FEELING  
22 INSIDE YOU THAT YOU CAN'T MANAGE, YOU DON'T WANT TO FEEL  
23 THE WAY YOU FEEL. AND INSTEAD OF OWNING THAT YOU FEEL  
24 THAT WAY, YOU IMAGINE OTHER PEOPLE FEEL THAT WAY. SO  
25 IT'S NOT BASED ON YOUR EXPERIENCE, IT'S BASED ON YOUR  
26 DISCOMFORT WITH YOUR OWN FEELINGS.

27 Q OKAY. SO IF I AM TENSE, I HAVE A TENDENCY TO  
28 LOOK AND SAY, OH, ALL YOU PEOPLE LOOK TENSE, THAT'S

1 PROJECTION; RIGHT?

2 A YES.

3 Q AND TRANSFERENCE IS I THINK MEN ARE DANGEROUS AND  
4 THEREFORE, MR. GOLDBERG IS A DANGEROUS MAN; IS THAT  
5 RIGHT?

6 A BASED ON YOUR EARLY EXPERIENCES --

7 Q OKAY.

8 A -- OF FINDING MEN DANGEROUS, YES.

9 Q OKAY. NOW, I WANT TO GO BACK TO YOUR NOTES  
10 WHICH --

11 MR. GOLDBERG: 104.

12 MS. GAROFALO: 104, EXHIBIT 104 AND I'D LIKE TO  
13 GO TO PAGE 23, IF WE CAN.

14 MR. GOLDBERG: DO YOU NEED THE...

15 MS. GAROFALO: OH, TAKE YOUR TIME, I APOLOGIZE.

16 THE WITNESS: I WOULD LIKE TO -- IT'S HARD FOR ME  
17 TO TURN.

18 MS. LEAL: MAY I GET THE CLERK'S COPY?

19 HON. T.A. GREEN: MR. CLERK, I THINK WE NEED YOUR  
20 COPY FOR SOMETHING.

21 MS. LEAL: 104.

22 MR. GOLDBERG: I CAN GIVE HER MINE.

23 THE WITNESS: I CAN TURN, IF NEED BE.

24 MR. GOLDBERG: I CAN GIVE HER MINE.

25 THE WITNESS: I CAN JUST MOVE MY CHAIR.

26 MS. LEAL: I FOUND IT. WE FOUND IT.

27 HON. T.A. GREEN: YEAH, I THINK WE HAVE IT.

28 MR. GOLDBERG: YOU GOT IT?

1 THE WITNESS: THANK YOU. WHAT PAGE IS THIS NOW?

2 MS. GAROFALO:

3 Q OKAY. SO WE'RE GOING TO START WITH PAGE 23.

4 A OKAY.

5 Q ARE YOU THERE YET?

6 A I AM.

7 Q ALL RIGHT. SO CLOSE DOWN -- WELL, ON THE SCREEN  
8 UNDER B, DO YOU SEE WHERE IT SAYS, "NIGHTMARES"?

9 A UM-HMM, YES.

10 Q AND THEN UNDERNEATH THAT, IT SAYS, "HAD FEAR T.J.  
11 MIGHT KILL HER."

12 A UM-HMM.

13 Q "VERY FRIGHTENED."

14 AND WHAT'S THE WORD WE SEE?

15 A "ALKI MIGHT KILL HER."

16 Q "ALKI MIGHT KILL HER."

17 "ALKI SEEMED MORE REALISTIC THAT HE MIGHT KILL  
18 HER."

19 A UM-HMM.

20 Q SO HERE YOU'RE COMPARING MS. REEVES' FEELINGS  
21 ABOUT T.J. WHO THREATENED TO KILL HER --

22 A YES.

23 Q -- WITH MR. DAVID AND HER FEAR THAT HE WOULD KILL  
24 HER; CORRECT?

25 A CORRECT.

26 Q IS THIS TRANSFERENCE?

27 A I DON'T THINK SO.

28 Q ARE YOU AWARE OF ANY -- STRIKE THAT.

1           DID MS. REEVES TELL YOU THAT MR. DAVID EVER,  
2 OTHER THAN THE ONE LITTLE NOTE WE'VE SEEN, TRIED TO  
3 CONTACT HER?

4           A NO.

5           Q DID MS. REEVES TELL YOU THAT MR. DAVID HAD EVER  
6 THREATENED TO KILL HER?

7           A NO.

8           Q BUT T.J. THREATENED TO KILL HER, DIDN'T HE?

9           A CORRECT.

10          Q AND T.J. WAS PHYSICALLY VIOLENT, WASN'T HE?

11          A CORRECT.

12          Q AND YOU ARE COMPARING T.J. IN THIS NOTE?

13          A UM-HMM.

14          Q BASED ON WHAT MS. REEVES WAS TELLING YOU --

15          A UM-HMM.

16          Q -- TO MR. DAVID; CORRECT?

17          A I'M COMPARING HER FEAR WITH T.J. TO HER FEAR WITH  
18 MR. DAVID.

19          Q NOW, LET'S LOOK AT PAGE 15, IF WE MIGHT.

20          A READY.

21          Q OKAY. AND AT THE TOP, AGAIN, WE HAVE NOTES IN  
22 WHICH MS. REEVES IS TALKING ABOUT T.J. WHO PHYSICALLY  
23 ASSAULTED HER?

24          A UM-HMM.

25          Q AND EMOTIONALLY ABUSED HER?

26          A CORRECT.

27          Q AND MR. DAVID IN THE SAME PASSAGES; CORRECT?

28          A CORRECT.

1 Q AND I ASSUME WHEN YOU SAY, "SHE WAS FRIGHTENED,"  
2 YOU ARE TALKING ABOUT MS. REEVES?

3 A CORRECT.

4 Q "SHE WAS FRIGHTENED THAT HER BOSS WOULD TRY TO  
5 HURT HER, LEFT T.J."  
6 AND WHAT'S NEXT WORD?

7 A I'M NOT SURE.

8 Q AND WHAT?

9 A I DON'T KNOW.

10 Q OKAY. "MET T.J." AND SOMETHING?

11 A "AND LEFT."

12 Q "AND LEFT T.J."?

13 A I THINK. LEFT SOMETHING.

14 Q "SIMILAR FEELING, UNSAFE"?

15 A UM-HMM.

16 Q "PARANOID, WORRIED SHE WAS CRAZY TO FEEL THIS  
17 WAY"?

18 A CORRECT.

19 Q AND MS. REEVES IS TELLING YOU THAT SHE WAS  
20 WORRIED THAT SHE WAS CRAZY TO FEEL PARANOID ABOUT T.J.  
21 AND MR. DAVID?

22 A NO, ABOUT MR. DAVID.

23 Q RIGHT.

24 A NOT T.J.

25 Q OKAY.

26 SO SHE WAS CONCERNED THAT SHE WAS FEELING  
27 PARANOID ABOUT MR. DAVID?

28 A CORRECT.

1 Q AND THAT WAS IN THE SAME SENTENCE THAT SHE WAS  
2 TALKING ABOUT HER FEAR OF T.J.; CORRECT?

3 A CORRECT.

4 Q ISN'T THIS INDICATIVE OF TRANSFERENCE?

5 A WELL, THE REASON I DON'T SEE IT AS TRANSFERENCE  
6 IS -- I MEAN, T.J. THREATENED HER AND MR. DAVID  
7 ASSAULTED HER, SO TRANSFERENCE IS WHEN THERE'S REALLY NO  
8 BASIS TO TRANSFER IT. BUT IN THIS CASE, MAKING THE  
9 ASSOCIATION MADE A LOT OF SENSE BECAUSE MR. DAVID HAD  
10 BEEN VIOLENT WITH HER, HAD THREATENED HER, HAD TRIED TO  
11 DOMINATE HER, HAD TRIED TO HUMILIATE HER, SO IT DOESN'T  
12 SEEM TO ME LIKE IT'S TRANSFER. IT SEEMS TO ME THEY'RE  
13 SIMILAR, SHE'S HAD A FEELING OF FRIGHT BEFORE, BUT IT  
14 DOESN'T SEEM TO ME LIKE IT'S TRANSFERENCE.  
15 BECAUSE IN TRANSFERENCE, YOU CAN ANALYZE AWAY THE PART  
16 THAT'S COMPLETELY UNREALISTIC. AND IN THIS CASE, THAT  
17 WASN'T NECESSARILY THE CASE.

18 Q AND WHAT PHYSICAL VIOLENCE BY MR. DAVID --  
19 ALLEGEDLY BY MR. DAVID, ARE YOU REFERRING TO?

20 A THE TRYING TO CHOKE HER, THE PUTTING HER HEAD  
21 BETWEEN HIS LEGS, HOLDING HER -- HOLDING HER SO THAT SHE  
22 WAS HELPLESS.

23 Q OKAY. ANYTHING VIOLENT IN THE WAY THAT T.J. WAS  
24 VIOLENT, SOMETHING THAT MIGHT BRUISE, SOMETHING -- ANY  
25 CONDUCT BY MR. DAVID THAT WAS INTENDED TO PHYSICALLY  
26 HURT MS. REEVES THAT YOU KNOW ABOUT?

27 A WELL, AS OF NOW, YES, I THINK THE CHOKING HER  
28 WAS, YES.

1 Q OKAY. BUT YOU DIDN'T KNOW THAT AT THE TIME;  
2 RIGHT?

3 A I -- I DID NOT KNOW AT THE TIME.

4 Q YOU ONLY LEARNED THAT FROM READING MR. WEISMAN'S  
5 --

6 A AND MS. REEVES' TESTIMONY.

7 Q -- TESTIMONY?

8 A YES.

9 Q BUT BEFORE THIS TRIAL, THAT WAS NOTHING THAT MS.  
10 REEVES TOLD YOU ABOUT; CORRECT?

11 A WELL, SHE HAD TOLD ME ABOUT IT, BUT NOT -- I  
12 DIDN'T HAVE THE SENSE OF THE ENORMITY OF THE VIOLENT AND  
13 OF THE MENACE.

14 Q SO ONLY TRIAL TESTIMONY. HERE AT TRIAL WHEN MS.  
15 REEVES IS TRYING TO CONVINCING A JURY OF HER CASE, DID YOU  
16 LEARN THAT THERE WAS ONE INCIDENT OF ALLEGED PHYSICAL  
17 VIOLENCE ON MS. REEVES; ISN'T THAT RIGHT?

18 A NO, THAT'S NOT RIGHT.

19 Q AND LET'S GO BACK TO MS. REEVES' FATHER FOR A  
20 MOMENT AND HER FEELINGS OR HER FEARS THAT HAD BEEN  
21 SUPPRESSED MIGHT ALSO NOT BE TRANSFERRED ONTO MEN IN HER  
22 LIFE; CORRECT?

23 A THERE WASN'T EVIDENCE TO THAT EFFECT. ARE WE  
24 GOING WITH A HYPOTHETICAL OR WITH MS. REEVES? WITH MS.  
25 REEVES, SHE WENT ON TO HAVE RELATIONSHIPS WITH MEN THAT  
26 DID NOT SEEM TO BE IMPACTED EXCEPT WHEN SHE STAYED WITH  
27 A VIOLENT MAN.

28 Q OKAY. AS A DIAGNOSTICIAN YOU KNOW THAT THAT'S

1 POSSIBLE; ISN'T THAT CORRECT?

2 A AGAIN, WE WENT THROUGH THIS THE OTHER DAY. DO  
3 YOU WANT MY EXPERT OPINION ABOUT PEOPLE IN GENERAL OR  
4 ARE WE DISCUSSING MS. REEVES SPECIFICALLY?

5 Q I AM ASKING YOU SPECIFICALLY WITH RESPECT TO MS.  
6 REEVES, THE VIOLENCE, THE PHYSICAL VIOLENCE RESTED ON  
7 MS. REEVES AS A CHILD BY HER FATHER COULD CAUSE  
8 FEELINGS, EVEN THOUGH SUPPRESSED, OF MISTRUST IN MEN;  
9 ISN'T THAT RIGHT?

10 A THERE WASN'T EVIDENCE FOR THAT. I KNOW YOU'D  
11 LIKE ME TO SAY YES, BUT SHE WENT ON TO HAVE  
12 RELATIONSHIPS WITH MEN THAT DIDN'T INVOLVE THAT, SHE  
13 DIDN'T SEEM FRIGHTENED OF MEN. IF ANYTHING, SHE WAS  
14 LESS FRIGHTENED THAN SHE SHOULD HAVE BEEN RATHER THAN  
15 MORE FRIGHTENED.

16 SO UNTIL HER PSYCHIC STRUCTURE BROKE, SHE WAS NOT  
17 PAYING ATTENTION TO ALARMS, QUITE THE OPPOSITE OF WHAT  
18 YOU'RE SUGGESTING.

19 Q SO WHEN YOU TALK ABOUT HER -- WHEN I LISTENED TO  
20 YOU TALK ABOUT HER PSYCHIC STRUCTURE BREAKING --

21 A UM-HMM.

22 Q -- IT'S ALMOST LIKE, TO ME, THE IMAGE IS THERE'S  
23 A DAM AND ALL OF THIS IS WALLED UP SOMEWHERE IN MS.  
24 REEVES' MIND AND THEN THE DAM BROKE; IS THAT A CORRECT  
25 ANALOGY?

26 A WELL, PEOPLE CAN HAVE PTSD WHEN THERE'S NO  
27 PREVIOUS DAM, SO I WOULDN'T SAY THAT'S NECESSARILY THE  
28 CASE. IN FACT, ANYONE CAN GET PTSD. YOU'RE MORE

1 VULNERABLE IF YOU'VE HAD CERTAIN EXPERIENCES IN YOUR  
2 LIFETIME AND I THINK THAT'S WHAT YOU'RE TRYING TO  
3 SUGGEST.

4 Q OKAY. LET'S TALK ABOUT. HANG ON ONE MINUTE.  
5 I'M TRYING TO NARROW THIS DOWN.  
6 LET'S JUST LOOK AT ONE MORE PAGE IN EXHIBIT 104,  
7 PAGE 29.

8 AND THE SECOND SENTENCE YOU SAY, AND AGAIN, THIS  
9 IS, I ASSUME, SOMETHING THAT MS. REEVES TOLD YOU "LIVING  
10 WITH T.J. AGAIN, SEEMS" CAN YOU READ THAT FOR US?

11 A "YEARS LATER COULDN'T GET OUT." THIS, AGAIN, I  
12 THINK IS A DREAM.

13 Q OKAY. SO HERE WE ARE IN OCTOBER OF 2017, DO I  
14 HAVE THE DATE RIGHT?

15 A LOOKS GOOD.

16 Q OKAY. SEVEN YEARS AFTER SHE LEFT T.J.?

17 A UM-HMM. CORRECT.

18 Q AND SHE STILL FEELS SHE'S STILL THINKING ABOUT  
19 HIM, HAVING NIGHTMARES ABOUT HIM AND THINKING THAT SHE  
20 COULDN'T GET OUT; IS THAT CORRECT?

21 A IT'S STILL IN HER UNCONSCIOUS. THIS WAS A DREAM,  
22 A NIGHTMARE, SO SHE'S HAVING NIGHTMARES BECAUSE SHE'S  
23 TRAUMATIZED AND OLD FEARS -- FEARFUL STATES ARE  
24 REEMERGING.

25 Q OKAY. SO OLD --

26 A THE SYMBOLISM IN THE DREAM OF HAVING SOMEBODY  
27 WHO'S THREATENING TO KILL YOU IS RE-EMERGING, SHE'S HAD  
28 THAT EXPERIENCE, IT'S A POTENT SYMBOL, SO IT'S COMING UP

1           AGAIN.

2           Q   OKAY.   SHE HAD THAT EXPERIENCE WITH T.J.?

3           A   YES.

4           Q   AS FAR AS YOU KNOW, MR. DAVID NEVER THREATENED TO  
5           KILL MS. REEVES?

6           A   I WAS REFERRING TO T.J. WITH THAT.

7           Q   OKAY.

8           A   I THINK WE HAD DISCUSSED IN THE DEPOSITION, IT  
9           WAS IN HER BODY --

10          Q   THANK YOU.   THERE'S NO QUESTION PENDING.

11          A   -- AND HER MIND.

12          HON. T.A. GREEN:   YEAH, QUESTION.

13          MS. GAROFALO:   THANK YOU.   THERE'S NO QUESTION  
14          PENDING, MS. MEYER.

15          MS. LEAL:   DR. MEYER.

16          THE WITNESS:   THANK YOU.

17          MS. GAROFALO:

18          Q   NOW, IN ADDITION TO HAVING DIFFICULTIES TRUSTING  
19          MEN DURING THE PERIOD OF TIME MS. REEVES WAS SEEING YOU,  
20          MS. REEVES IS HAVING DIFFICULTIES WITH OTHERS IN THE  
21          WORKPLACE; CORRECT?

22          A   I'M NOT SURE WHAT YOU'RE REFERRING TO.

23          Q   OKAY.   WELL, LET'S START WITH PAGE 24 IN  
24          EXHIBIT 104.

25          AND TAKE IT DOWN A LITTLE BIT HERE.   FURTHER DOWN.

26          OKAY.

27          AND YOU SAY HERE, MS. REEVES -- AGAIN, THIS IS  
28          WHAT MS. REEVES IS TELLING YOU; CORRECT?

1 A I'M NOT SURE WHAT YOU'RE REFERRING TO YET, SO.

2 Q WELL, WHATEVER THE NOTES ARE, FAIR ENOUGH.

3 IT SAYS, "HAVING AN ENEMY WHO PLOTS AGAINST HER."

4 A UM-HMM.

5 Q "SOMEONE WHO'S BEEN A REAL FRIEND."

6 A UM-HMM.

7 Q "LR STILL," WHAT'S THAT WORD?

8 A "CHECKS ON HER A FEW TIMES A WEEK."

9 Q OKAY. "IS SHE STILL PLOTTING AGAINST ME?"

10 AND CAN WE GO UP TO THE TOP AND SEE IF WE CAN SEE THE  
11 DATE ON THIS, MR. KALTGRAD?

12 A YOU WON'T FIND ONE.

13 Q I WON'T FIND ONE?

14 A JUST BECAUSE IT'S NOT THERE.

15 Q OKAY. DO YOU KNOW ABOUT WHEN IN YOUR  
16 TREATMENT...

17 A LOOKS LIKE THIS WOULD BE JULY OR AUGUST 2017.

18 Q OKAY. BUT IT'S DEFINITELY AFTER SHE LEFT FILMON?

19 A OH, YES.

20 Q OKAY. SO NOW SHE BELIEVES SHE HAS AN ENEMY  
21 PLOTTING AGAINST HER WHO USED TO BE A FRIEND; CORRECT?

22 A NO, THAT'S A MISCHARACTERIZATION.

23 Q OKAY. WELL, LET'S READ IT.

24 "IS SHE STILL PLOTTING AGAINST ME?"

25 YOU'RE TALKING ABOUT -- YOU'RE NOT TALKING ABOUT YOU,  
26 THIS IS SOMETHING MS. REEVES SAID TO YOU; CORRECT?

27 A CORRECT.

28 Q OKAY. AND SHE SAYS, "HAVING AN ENEMY," SO MS.

1 REEVES IS TELLING YOU THAT SHE HAS AN ENEMY?

2 A RIGHT. THIS WOULD BE SHALAR.

3 Q WHO USED TO BE A FRIEND?

4 A RIGHT.

5 Q AND IS WONDERING IF SHE'S PLOTTING AGAINST ME;  
6 CORRECT?

7 A CORRECT.

8 Q OKAY. AND THIS WAS SOMEBODY WHO USED TO BE A  
9 FRIEND; CORRECT?

10 A WHO SHE THOUGHT WAS A FRIEND.

11 Q OKAY. AND --

12 A IT WOULD BE ANOTHER ONE OF THOSE CASES WHERE HER  
13 ALARMS DID NOT GO OFF IS MY OPINION.

14 Q ANOTHER CASE WHERE SOMEBODY WAS PLOTTING AGAINST  
15 HER AND SHE DIDN'T NOTICE IT UNTIL SOMETIME LATER, IS  
16 THAT IT?

17 A YES. THIS WAS THE WOMAN WHO HAD BEEN DOING THE  
18 TWITTER CAMPAIGN ANONYMOUSLY AGAINST HER.

19 Q OKAY. ALL RIGHT. SO THAT WAS -- SHALAR WAS THE  
20 NAME?

21 A INDEED.

22 Q ALL RIGHT. NOW, LET'S GO TO PAGE 32.

23 MR. GOLDBERG: ARE YOU ALL RIGHT, JUDGE?

24 HON. T.A. GREEN: I'M FINE, THANK YOU.

25 THE WITNESS: 32?

26 MS. GAROFALO: YEP.

27 Q AND AT THE TOP, IT SAYS, "THIS GIRL, ARROW SARA  
28 B, FEELS LIKE T.J. WISHES HER ILL"?

1 A UM-HMM.

2 Q "TRYING TO BLOCK HER"?

3 A UM-HMM.

4 Q WHAT WAS THAT ALL ABOUT?

5 A YOU ASKED ME THE OTHER DAY, I STILL DON'T KNOW.

6 Q OKAY. BUT THIS IS SOMEBODY ELSE WHO MS. REEVES  
7 WAS FEELING WAS SOMEHOW WORKING AGAINST HER; CORRECT?

8 A I WOULD SAY BLOCKS ADDRESSES PROFESSIONAL, BUT I  
9 DON'T RECALL.

10 Q YOU DON'T RECALL WHAT THAT ONE IS?

11 A UM-HMM.

12 Q AND MS. REEVES ALSO COMPLAINED TO YOU ABOUT  
13 SOMEONE AT WORK WHO WAS PLOTTING AGAINST HER; ISN'T THAT  
14 CORRECT?

15 A I DON'T RECALL THAT.

16 Q YOU DON'T RECALL THAT?

17 A CAN YOU REMIND ME WHO THAT IS?

18 Q I WILL.

19 A THANK YOU.

20 Q LET'S LOOK AT PAGE 21. AND THIS HAS TWO DATES ON  
21 IT, ONE IS 6/9/17, AND THE OTHER IS 6/7/17, AND IT SAYS,  
22 "WORK SLASH," WHOOPS, YOU'VE GOT THE WRONG. THERE WE  
23 GO, "WORK SLASH OFFICE MATE IS ATTACKING HER"?

24 A RIGHT. NOTHING ABOUT PLOTTING.

25 Q OH?

26 A NOTHING ABOUT PLOTTING.

27 Q OH, I STAND CORRECTED.

28 THIS TIME, THE -- WHERE THE OFFICE MATE IS

1           ATTACKING HER IN JUNE OF 2017?

2           A    AND IT MEANS ATTACKING HER IDEAS, TO BE CLEAR,  
3           THERE WAS NO SUGGESTION OF ANY PHYSICAL VIOLENCE THERE.  
4           SHE FELT THAT SHE WAS BEING -- HER IDEAS WERE BEING TORN  
5           DOWN.

6           Q    ALL RIGHT.   SO IN JUNE OF 2017 --

7           A    UM-HMM.

8           Q    -- MS. REEVES IS TELLING YOU ABOUT ISSUES EITHER  
9           BEING THREATENED, ATTACKED OR PLOTTED AGAINST BY MR.  
10          DAVID AND AT LEAST THREE OTHER PEOPLE; CORRECT?

11          A    NO, I COULD NOT PUT THOSE TOGETHER.

12          Q    LET'S GO BACK TO MS. REEVES' PRESENT CONDITION  
13          AND LET'S FIRST LOOK AT A DOCUMENT THAT I HAVE  
14          MISPLACED.   HOLD ON ONE SEC.   I'LL FIND THAT IN A  
15          MINUTE.

16          SO, NOW, YOU'VE TOLD US THAT -- YOU HAVE STATED  
17          THAT MS. REEVES IS SIGNIFICANTLY IMPROVED; IS THAT  
18          CORRECT?

19          A    CORRECT.

20          Q    AND WHICH SYMPTOMS ARE SIGNIFICANTLY IMPROVED?

21          A    SHE'S SLEEPING BETTER, SHE -- I THINK SHE'S STILL  
22          VIGILANT, BUT LESS VIGILANT.   HER CONCENTRATION HAS  
23          IMPROVED, SHE IS ABLE TO GET PLEASURE FROM SOME THINGS,  
24          NOT AS MUCH AS SHE USED TO, BUT SHE'S ABLE TO GET  
25          PLEASURE FROM SOME THINGS.   SHE'S MORE SOCIAL, SHE HAS  
26          MORE ENERGY, SHE'S ABLE -- SHE DOESN'T HAVE AS MANY  
27          NIGHTMARES AS SHE WAS HAVING.   IF I COULD LOOK AT THE  
28          SYMPTOMS, I COULD PROBABLY DO A BETTER JOB OF -- MAY I

1 LOOK AT MY SYMPTOM LIST?

2 Q SURE.

3 A OKAY. THIS IS THE DSM SYMPTOMS THAT I HAD THE  
4 OTHER DAY, IT'S JUST HARD TO REMEMBER THEM ALL.

5 SO FEWER NIGHTMARES, LESS DISTRESS, SHE CAN DRIVE  
6 THROUGH BEVERLY HILLS NOW, I BELIEVE. SHE WAS UNABLE TO  
7 FOR A COUPLE YEARS.

8 SHE -- SO SHE'S AVOIDING -- SHE'S NOT ENGAGING IN  
9 AS MUCH AVOIDANCE BEHAVIOR, SHE DOESN'T GET TRIGGERED AS  
10 EASILY, SHE IS NOT FILLED WITH NEARLY AS MUCH FEAR AND  
11 HORROR AS SHE WAS.

12 I'M REPEATING MYSELF, I'M SORRY, BUT I'M GOING  
13 THROUGH THIS LIST HERE SYSTEMATICALLY NOW.  
14 I THINK SHE FEELS LESS DETACHED FROM OTHERS. I THINK,  
15 YEAH, AND SHE HAS A BETTER -- SHE'S BETTER ABLE TO ENJOY  
16 THINGS. LESS IRRITABLE, LESS HYPERVIGILANT. I DON'T  
17 KNOW ABOUT THE STARTLED RESPONSE. AND THE SLEEP IS  
18 BETTER, SO THOSE ARE THE PTSD SYMPTOMS.

19 IN TERMS OF MAJOR DEPRESSION, I DON'T THINK --  
20 SHE'S NOT AS DEPRESSED AS SHE WAS. AGAIN, SHE'S ABLE TO  
21 HAVE INTEREST IN THINGS MORE THAN SHE WAS, SHE STILL HAS  
22 THE WEIGHT GAIN. SLEEP IS BETTER, NOT AS GOOD AS IT  
23 WAS. ENERGY IS BETTER, CONCENTRATION IS BETTER, AND I  
24 DON'T BELIEVE SHE THINKS OF DYING NOW.

25 Q NOW, I JUST WANT TO BE CERTAIN WE UNDERSTAND YOU  
26 CORRECTLY.

27 WHEN YOU SAY "MORE THAN SHE WAS," DO YOU MEAN  
28 MORE THAN SHE WAS WHEN SHE BEGAN TREATMENT WITH YOU OR

1 MORE THAN SHE WAS BEFORE SHE WORKED AT FILMON?

2 A YOU'LL HAVE TO REMIND ME WHAT I SAID MORE THAN  
3 SHE WAS ABOUT.

4 Q YOU SAID IT SEVERAL TIMES, SHE COULD ENJOY THINGS  
5 MORE THAN SHE WAS.

6 A OH, MORE THAN SHE WAS WHEN SHE FIRST CAME TO SEE  
7 ME, SO I WAS JUST DOING A COMPARISON FROM WHEN I FIRST  
8 SAW HER.

9 Q OKAY. BECAUSE YOU CAN'T COMPARE MS. REEVES  
10 EITHER WHEN SHE FIRST SAW YOU OR NOW TO WHAT MS. REEVES  
11 WAS BEFORE SHE WORKED AT FILMON BECAUSE YOU HAD NEVER  
12 MET MS. REEVES; CORRECT?

13 A I CAN ONLY COM -- MAKE COMPARISONS BASED ON HER  
14 SELF REPORT, WHICH IS WHAT I'M ALWAYS RELYING ON, BUT IT  
15 IS DIFFERENT WHEN I'M ACTUALLY SEEING THE PERSON AND  
16 TALKING TO THEM, FOR SURE.

17 Q THE QUESTION IS, DR. MEYER, THAT PRIOR TO  
18 DECEMBER 2016, YOU HAD NEVER MET MS. REEVES; CORRECT?

19 A THAT'S CORRECT. STILL CORRECT.

20 Q YOU DIDN'T KNOW WHAT SHE LOOKED LIKE; CORRECT?

21 A ABSOLUTELY.

22 Q DIDN'T KNOW HOW THIN OR FAT SHE WAS; CORRECT?

23 A WELL, I KNEW SHE'D WORKED AS A MODEL, SO I KNEW  
24 SHE HAD TO HAVE BEEN PRETTY THIN. WELL, ACTUALLY, I WAS  
25 TOLD SHE WAS -- WORKED AS A MODEL.

26 Q THAT'S MY POINT.

27 ANYTHING THAT YOU THOUGHT SHE WAS PRIOR TO  
28 DECEMBER 2016 --

1 A UM-HMM.

2 Q -- IS BASED SOLELY ON WHAT MS. REEVES TOLD YOU;  
3 CORRECT?

4 A CORRECT.

5 Q MS. REEVES HIRED YOU AND TOLD YOU THOSE THINGS  
6 ONLY AFTER SHE FILED HER LAWSUIT AGAINST MR. DAVID;  
7 CORRECT?

8 A CORRECT. WELL, SHE DIDN'T HIRE ME. BUT CORRECT,  
9 I -- SHE STARTED SEEING ME.

10 Q FAIR ENOUGH.

11 SO EVERYTHING SHE TOLD YOU ABOUT WHAT SHE WAS  
12 PRIOR TO --

13 A UM-HMM.

14 Q -- TO DECEMBER OF 2016, WAS TOLD TO YOU AFTER SHE  
15 FILED THIS LAWSUIT AGAINST MR. DAVID; RIGHT?

16 A WRONG.

17 Q OKAY. LET ME REPHRASE IT BECAUSE ANYTHING THAT  
18 YOU UNDERSTOOD MS. REEVES WAS PRIOR TO 2015 OR PRIOR TO  
19 DECEMBER 2016, WAS BASED ON WHAT SHE TOLD YOU?

20 A CORRECT.

21 Q AND WHAT SHE TOLD YOU SHE TOLD YOU AFTER SHE  
22 FILED THIS LAWSUIT; CORRECT?

23 A SOME OF IT SHE TOLD ME BEFORE SHE FILED THIS.  
24 WE'VE LEARNED -- I MADE A MISTAKE THE OTHER DAY. SHE  
25 HADN'T YET FILED THE LAWSUIT WHEN I MET HER. SHE HAD  
26 MET WITH HER ATTORNEYS, BUT HAD NOT FILED THE LAWSUIT.

27 Q FAIR ENOUGH.

28 EVERYTHING SHE TOLD YOU ABOUT WHAT SHE WAS --

1 A UM-HMM.

2 Q -- WAS TOLD TO YOU AFTER SHE HIRED COUNSEL TO  
3 BRING THIS LAWSUIT; CORRECT?

4 A CORRECT.

5 Q AND YOU, IN FACT, WERE RECOMMENDED BY THE  
6 LAWYERS; CORRECT?

7 A CORRECT.

8 Q AND YOU KNEW FROM THE FIRST DAY YOU SAW MS.  
9 REEVES THAT THE NOTES YOU WERE TAKING AND YOUR TREATMENT  
10 OF MS. REEVES WOULD SOMEDAY -- MIGHT SOMEDAY BE THE  
11 SUBJECT OF YOUR TESTIMONY IN THIS LAWSUIT; CORRECT?

12 A THAT WAS NOT MY ASSUMPTION. IT SHOULD HAVE BEEN,  
13 BUT AS I SAID, I'VE NEVER HAD A CASE GO TO TRIAL BEFORE,  
14 SO I DIDN'T OPERATE WITH THE IDEA THAT THIS WAS GOING TO  
15 GO TO TRIAL.

16 Q OKAY. YOU UNDERSTOOD THAT IF THIS CASE WENT TO  
17 TRIAL, THAT YOUR NOTES AND YOUR TESTIMONY -- I -- STRIKE  
18 THAT.

19 YOU WOULD BE PROVIDING TESTIMONY ON THE NOTES YOU  
20 WERE TAKING OF YOUR SESSIONS WITH MS. REEVES; CORRECT?

21 A I WAS NOT FOCUSED ON THAT.

22 Q AND DID THAT IN ANY WAY AFFECT WHAT YOU DECIDED  
23 TO WRITE DOWN AND WHAT YOU DECIDED TO KEEP OUT OF YOUR  
24 NOTES?

25 A UNFORTUNATELY NOT. AS I'VE SAID, I WOULDN'T HAVE  
26 WRITTEN DOWN A LOT OF THE THINGS ABOUT HER FAMILY IF I  
27 HAD BEEN THINKING ABOUT THAT.

28 Q AND BY THE WAY, LET ME JUST GO BACK FOR A MOMENT.

1 ARE YOU TESTIFYING THAT YOU FIRST SAW MS. REEVES BEFORE  
2 THIS LAWSUIT WAS FILED?

3 A APPARENTLY, I -- REMEMBER, I GOT THAT WRONG TWICE  
4 AND THEN I WAS CORRECTED, SO I DON'T KNOW WHEN THE  
5 LAWSUIT WAS FILED.

6 Q OKAY.

7 A I KNOW WHEN SHE WENT TO THE LAWYERS AND I KNOW  
8 THE LAWYERS REFERRED HER TO ME, BUT I DON'T REALLY KNOW  
9 WHEN THE LAWSUIT WAS FILED.

10 Q AND YOUR FIRST VISIT WITH MS. REEVES WAS  
11 DECEMBER 20TH, 2016; CORRECT?

12 A DECEMBER SOMETHING.

13 Q ALL RIGHT. THE DATE OF THE FIRST NOTE, AS YOU  
14 CAN SEE HERE?

15 A YES.

16 Q OKAY. AND WHEN YOU TOLD MS. REEVES AT THE  
17 BEGINNING THAT CERTAIN THINGS -- IF SHE TOLD YOU CERTAIN  
18 THINGS, IT INDICATED SHE WAS A THREAT TO HERSELF OR  
19 OTHERS --

20 A UM-HMM.

21 Q -- YOUR NOTES, YOUR THERAPY SESSIONS, MIGHT NOT  
22 BE CONFIDENTIAL; CORRECT?

23 A NO. WELL, IT HAS NOTHING TO DO WITH NOTES,  
24 THAT'S JUST TO KEEP HER SAFE, SO I MIGHT NOT NEED TO  
25 NOTIFY A FAMILY MEMBER WHO MIGHT NOTIFY LAWYERS IF  
26 THAT'S WHO I KNEW, I MIGHT CALL 911, I WOULD JUST HAVE  
27 TO DO SOMETHING TO KEEP HER SAFE. THAT HAS NOTHING TO  
28 DO WITH MY NOTES.

1 Q ALL RIGHT. WHAT EXACTLY DID YOU TELL HER WITH  
2 RESPECT TO CONFIDENTIAL ON DECEMBER 20TH, 2016, DURING  
3 YOUR FIRST SESSION?

4 MR. GOLDBERG: I THINK YOU MISSTATED, COUNSEL.  
5 IT WAS DECEMBER 10TH, I BELIEVE.

6 THE WITNESS: AND I CAN'T TELL YOU EXACTLY WHAT I  
7 TOLD HER BECAUSE IT WAS THREE YEARS AGO, BUT GENERALLY,  
8 WHAT I TELL PEOPLE IS, WHAT YOU SAY HERE IS PRIVATE  
9 UNLESS IT'S A DANGER TO YOURSELF OR DANGER TO OTHERS.  
10 I'M SURE I ALSO TOLD HER BECAUSE THIS IS IN A LAWSUIT,  
11 THIS IS A DIFFERENT SITUATION AND THINGS MAY NOT STAY --  
12 STAY PRIVATE. I AM SURE I TOLD HER THAT.

13 MS. GAROFALO:

14 Q OKAY.

15 A BUT I TELL EVERYONE THAT. AND AGAIN, NEVER HAVE  
16 I HAD TO TESTIFY, SO...

17 Q OKAY. SO YOU TOLD HER THAT BECAUSE THIS WAS A  
18 LAWSUIT --

19 A UM-HMM.

20 Q -- NOTHING THAT SHE TOLD YOU WOULD NECESSARILY BE  
21 CONFIDENTIAL; CORRECT?

22 A YES, I WOULD PRESUME.

23 Q BECAUSE SOMEDAY YOU MIGHT HAVE TO TESTIFY TO IT;  
24 CORRECT?

25 A UM-HMM.

26 Q SO IT WAS NO DIFFERENT THAN SUICIDAL THOUGHTS  
27 BECAUSE NOTHING SHE TOLD YOU WAS ANTICIPATED TO BE  
28 CONFIDENTIAL; CORRECT?

1           A NO, THAT'S VERY DIFFERENT. SO IF IT'S SUICIDAL,  
2 I HAVE TO DO SOMETHING TO KEEP HER SAFE, THAT HAS  
3 NOTHING TO DO WITH DISCLOSING ANYTHING PERSONAL ABOUT  
4 HER, THOSE ARE DIFFERENT THINGS.  
5 I THINK YOU'RE A LITTLE CONFUSED ON THAT.

6           Q SO DO YOU THINK SHE -- I'M A LITTLE CONFUSED?

7           A ON THAT.

8           Q SO DID SHE -- SO WHY DO YOU THINK SHE DIDN'T TELL  
9 YOU ABOUT BEING SUICIDAL? SHE DIDN'T WANT HELP?

10          A I -- I DON'T KNOW, I'VE TOLD YOU MY SPECULATION,  
11 BUT I DON'T KNOW.

12          Q BUT YOUR SPECULATION WAS WRONG, WASN'T IT?

13          A I DON'T KNOW WHAT YOU MEAN.

14          Q SHE DIDN'T NOT TELL YOU ABOUT BEING SUICIDAL?

15          A WAIT, THAT'S A DOUBLE NEGATIVE.

16          Q FOR FEAR THAT IT WOULD NOT BE CONFIDENTIAL; ISN'T  
17 THAT RIGHT?

18          A I DON'T KNOW.

19          Q BY THE WAY -- SO MS. REEVES TOLD YOU ABOUT A  
20 NUMBER OF INCIDENTS WITH MR. DAVID; IS THAT CORRECT?

21          A YES.

22          Q OKAY. AND WHAT WERE THE INCIDENTS? I'M NOT  
23 TALKING ABOUT IN THE TESTIMONY.

24          A UM-HMM.

25          Q WHAT WERE THE INCIDENTS THAT MS. REEVES TOLD YOU  
26 ABOUT DURING THE COURSE OF HER THERAPY WITH YOU?

27          A THE FINAL INCIDENT WHEN HE PUT HER HEAD FORCIBLY  
28 ON HIS CROTCH IN THE LOCKED OFFICE. SHE TOLD ME ABOUT

1 THE PUSHING HER UP AGAINST A WALL AND CHOKING, HOLDING  
2 HER THROAT. SHE TOLD ME ABOUT THE MAN-GINA. SHE TOLD  
3 ME ABOUT GETTING -- WELL, THAT'S WHAT -- THAT'S WHAT I  
4 CAN REMEMBER.

5 Q OKAY. SO THE FINAL INCIDENT, YOU JUST SAID SHE  
6 TOLD YOU ABOUT THE FINAL INCIDENT IN A LOCKED -- IN MR.  
7 DAVID'S LOCKED OFFICE?

8 A I DON'T THINK I SAID LOCKED.

9 Q WELL, YOU DID BECAUSE I WROTE IT DOWN.

10 A WELL, I WRITE DOWN THINGS THAT ARE WRONG ALL THE  
11 TIME. BUT MAYBE I DID. BUT I DIDN'T MEAN LOCKED,  
12 CLOSED OFFICE.

13 Q THAT THE OFFICE DOOR WAS CLOSED, THAT'S WHAT SHE  
14 TOLD YOU?

15 A BEING ALONE WITH HIM.

16 Q SO IF MS. REEVES AT THIS POINT HAS SUFFERED  
17 INCIDENTS INCLUDING -- ACCORDING TO WHAT SHE TOLD YOU, A  
18 CHOKING INCIDENT --

19 A UM-HMM.

20 Q -- AND SHE WAS -- WELL, STRIKE THAT.

21 DID MS. REEVES TELL YOU WHY SHE FEARLESS --  
22 FEARLESSLY WALKED INTO MR. DAVID'S OFFICE ALONE?

23 A WE DIDN'T --

24 Q AND HAD THE DOOR -- WITH THE DOOR CLOSED?

25 A WE DIDN'T DISCUSS THAT.

26 Q YOU DIDN'T DISCUSS THAT.

27 OKAY. AND DID SHE TELL YOU THAT MR. DAVID PUSHED  
28 HER AGAINST THE WALL AND SHE HIT HER HEAD?

1           A SHE HAD TOLD ME ABOUT THAT.

2           Q AND YOU HAVEN'T READ ANY OF THE TESTIMONY IN THIS  
3 CASE THAT CONTRADICTS MS. REEVES' DEPICTION OF THAT  
4 INCIDENT?

5           A NO, I HAVE NOT.

6           Q AND OTHER THAN THOSE THREE THINGS THAT YOU'VE  
7 JUST TOLD US, ANYTHING ELSE THAT YOU CAN RECALL THAT  
8 CAUSED MS. REEVES -- THAT MS. REEVES TOLD YOU CAUSED HER  
9 TO BE IN THE STATE SHE WAS IN WHEN SHE BEGAN SEEING YOU  
10 IN DECEMBER 2016?

11           A YES, IT WAS HER SENSE THAT HE WAS CRUEL, TRYING  
12 TO DOMINATE, HUMILIATE HER, THAT HE ENJOYED OTHER  
13 PEOPLE'S PAIN, THAT HE ENJOYED SHOCKING PEOPLE, THAT HE  
14 ENJOYED WHEN PEOPLE SUFFERED, THAT HE HAD BRAGGED ABOUT  
15 SOMEONE WHO HAD KILLED THEMSELF ON HIS SHOW, THAT HE HAD  
16 TAKEN PLEASURE FROM SOMEBODY PUTTING HOT SAUCE IN THEIR  
17 EYES, SOMEBODY PUTTING A NAIL THROUGH THEIR TESTICLES.

18           SHE HAD DESCRIBED A MAN WHO SOUNDED QUITE  
19 TERRIFYING.

20           Q YOU DID UNDERSTAND, DIDN'T YOU, THAT THAT WAS ALL  
21 PART OF THE EQUIVALENT OF A TELEVISION SHOW,  
22 ENTERTAINMENT?

23           A YES, AND I --

24           Q WRITTEN, WRITTEN ENTERTAINMENT?

25           A SORRY. I DID UNDERSTAND THAT IT WAS  
26 ENTERTAINMENT, BUT THE NATURE OF THE ENTERTAINMENT TOLD  
27 ME ABOUT -- A LOT ABOUT THE PERSON WHO WAS PRODUCING IT.

28           Q ALL RIGHT. WELL, WE'RE NOT ASKING YOU TO ANALYZE

1 MR. DAVID.

2 A WELL, YOU ASKED ME --

3 Q I -- I'M ASKING YOU A QUESTION.

4 YOU UNDERSTOOD THAT MS. REEVES HAD SIGNED ON TO WORK ON  
5 THIS KIND OF MATERIAL, DIDN'T YOU?

6 MR. GOLDBERG: OBJECTION. ASSUMES FACTS NOT IN  
7 EVIDENCE.

8 HON. T.A. GREEN: OVERRULED.

9 MR. GOLDBERG: YOUR HONOR --

10 HON. T.A. GREEN: YOU MAY ANSWER.

11 THE WITNESS: MY UNDERSTANDING HAD BEEN THAT SHE  
12 WAS WORKING ON A DIFFERENT SUBSET OF HIS COMPANY THAT  
13 WAS NOT DOING THAT KIND OF STUFF, THAT SHE FOUND THAT  
14 STUFF ABHORRENT AND DISGUSTING. AND THAT SHE HAD BEEN  
15 QUITE CLEAR THAT SHE WOULDN'T WORK ON THAT AS MUCH AS  
16 SHE NEEDED A JOB, BUT THAT SHE WOULD WORK ON SOMETHING  
17 ELSE IN THE COMPANY.

18 MS. GAROFALO:

19 Q AND --

20 A BUT THAT HAD NOTHING TO DO WITH WHO THE MAN IS  
21 WHO WOULD THEN LATER ASSAULT HER.

22 Q OKAY. I'M TALKING ABOUT MS. REEVES.

23 THAT'S WHAT MS. REEVES TOLD YOU, THAT SHE HAD NOTHING  
24 ELSE TO DO WITH ANY OF THIS OTHER CONTENT, THAT SHE WAS  
25 JUST COMPLETELY UNINVOLVED, THAT'S WHAT YOU'RE SAYING?

26 A THAT WAS MY IMPRESSION WAS THAT SHE DIDN'T WANT  
27 TO WORK ON THAT STUFF, YEAH.

28 Q OKAY. DID SHE TELL YOU THAT?

1 A I -- I DON'T RECALL.

2 Q OKAY. SO IT WAS YOUR IMPRESSION THAT SHE JUST  
3 DIDN'T WANT TO DO IT BECAUSE YOUR IMPRESSION WAS THAT  
4 MS. REEVES WAS JUST TOO NICE A PERSON TO WORK ON THAT  
5 KIND OF CONTENT?

6 A NO, I DIDN'T SAY THAT.

7 Q LET'S GO BACK TO MS. REEVES' IMPROVEMENT.  
8 AND LET'S GO BACK TO EXHIBIT 104, PAGE 2, MR. KALTGRAD,  
9 IF WE MIGHT. A LITTLE BIT BIGGER FOR THOSE OF US WHO  
10 CAN'T SEE. THANK YOU.

11 AND DO YOU RECOGNIZE THIS DOCUMENT, THIS PAGE?

12 A YES.

13 Q AND WHAT IS THIS?

14 A THIS WAS MY BILLING RECORD AND RECORD OF SESSIONS  
15 THAT WE'D HAD.

16 Q OKAY.

17 A UP UNTIL THE END OF 2000. WELL, UP UNTIL AUGUST  
18 OF 2018.

19 Q OKAY. AND IT HAS A DATE ON IT OF SEPTEMBER 5TH,  
20 2018.

21 IS THAT AT OR ABOUT THE TIME YOU PREPARED THIS?

22 A YES.

23 Q AND WAS THIS PREPARED AT THE REQUEST OF MS.  
24 REEVES' COUNSEL?

25 A YES.

26 Q AND IT WAS PREPARED AT THE TIME THAT YOU GAVE  
27 YOUR NOTES TO MS. REEVES' COUNSEL?

28 A I BELIEVE SO.

1 Q AND WE HAVE AT THE TOP, 2016, ONE SESSION.  
2 THAT WAS THE DECEMBER 20TH SESSION; CORRECT?

3 A UM-HMM. CORRECT.

4 Q AND UNDERNEATH IT, WE HAVE 2017 AND I BELIEVE IT  
5 SAYS 41 SESSIONS; CORRECT?

6 A CORRECT. IT SAYS 41 ABOVE AND 42 BELOW, BUT  
7 BASICALLY THERE.

8 Q MY MATH ISN'T THAT GOOD.  
9 BUT THAT'S LESS THAN ONCE A WEEK ON AVERAGE?

10 A IT WAS ABOUT ONCE A WEEK.

11 Q AND THEN WE HAVE 2018.  
12 CAN YOU JUST GO UP A LITTLE BIT. THERE WE GO.

13 AND YOU HAVE 27 SESSIONS?

14 A CORRECT.

15 Q AND THE NUMBER OF SESSIONS HAS DROPPED  
16 SIGNIFICANTLY FROM 2017 TO 2018; CORRECT?

17 A CORRECT.

18 Q AND I THINK YOU TOLD US -- WE DON'T HAVE TO LOOK  
19 AT THE NEXT PAGE UNLESS YOU CAN'T RECALL -- THAT SHE HAD  
20 ABOUT FIVE SESSIONS IN 2019; CORRECT?

21 A CORRECT.

22 Q WHICH WOULD BE LESS THAN ONCE A MONTH, MAYBE ONCE  
23 EVERY OTHER MONTH; CORRECT?

24 A CORRECT.

25 Q AND THE REDUCTION IN THE NUMBER OF SESSIONS, DOES  
26 THAT INDICATE THAT MS. REEVES NEEDED LESS THERAPY AS WE  
27 MOVE FROM 2017 THROUGH 2019?

28 A WELL, IT INDICATED THAT SHE CHOSE TO HAVE LESS

1 THERAPY.

2 Q AND IT IS CONSISTENT WITH WHAT YOU'VE TOLD US  
3 THAT SHE HAD SIGNIFICANTLY IMPROVED; ISN'T THAT TRUE?

4 A SHE HAD IMPROVED. SHE WAS ALSO WORKING, SO SHE  
5 WASN'T AT LIBERTY TO COME AS EASILY.

6 Q AND THAT -- THE FACT THAT MS. REEVES WAS  
7 WORKING --

8 A UM-HMM.

9 Q -- I DON'T KNOW IF IT WAS A FULL-TIME JOB, BUT ON  
10 A SHOW THAT'S ON STEADILY FOR MORE THAN ONE SEASON --

11 A UM-HMM.

12 Q -- DOES THAT INDICATE TO YOU THAT HER CONDITION  
13 AND THE CONDITIONS YOU WERE TREATING HAD IMPROVED?

14 A YES, I THINK THEY HAD IMPROVED.

15 Q OKAY.

16 MS. GAROFALO: I HAVE NO FURTHER QUESTIONS.

17 HON. T.A. GREEN: THANK YOU. WE HAVE LIKE FIVE  
18 MINUTES. HOW FAST CAN YOU TALK?

19 THE WITNESS: WE'RE BOTH FROM NEW YORK.

20 MR. GOLDBERG: WELL, I'M NOT GOING TO FINISH IN  
21 FIVE MINUTES, YOUR HONOR.

22 HON. T.A. GREEN: OKAY. WELL, DO YOU WANT TO  
23 START?

24 MR. GOLDBERG: I COULD START. OKAY. ALL RIGHT.

25

26 REDIRECT EXAMINATION

27 MR. GOLDBERG:

28 Q DR. MEYER, FIRST OF ALL, DID ANY OF YOUR

1 TREATMENT -- WERE YOU TAKING INTO ACCOUNT HOW THINGS  
2 WOULD LOOK IN A LAWSUIT?

3 A NO.

4 Q OKAY. AND IF SOMEBODY WAS TRYING TO BUILD A  
5 CASE, DO YOU THINK THEY WOULD COME IN AND TELL YOU ABOUT  
6 T.J. AND ABOUT OTHER EXPERIENCES THAT THEY HAD?

7 MS. GAROFALO: OBJECTION, OBJECTION.

8 HON. T.A. GREEN: SUSTAINED.

9 MR. GOLDBERG: WELL, COUNSEL, YOUR HONOR, SHE  
10 BROUGHT IT UP.

11 HON. T.A. GREEN: BUT SHE MAY HAVE ASKED ABOUT  
12 THAT TOPIC, BUT THAT ASSUMES THE DOCTOR UNDERSTANDS THE  
13 INS AND OUTS OF CIVIL LITIGATION AND TRIAL TACTICS,  
14 WHICH YOU COULD LAY A FOUNDATION, IF YOU WANT.

15 MR. GOLDBERG: ALL RIGHT.

16 Q IS THERE ANYTHING ABOUT THE WAY SHE COMMUNICATED  
17 TO YOU THAT WOULD SUGGEST THAT SHE WAS TRYING TO BUILD A  
18 CASE?

19 A NO.

20 Q IF SOMEBODY COMES TO YOU TO BUILD A CASE, DOES IT  
21 -- GENERALLY, DO THEY GET BETTER, DO THEY TRY TO GET  
22 BETTER, DO THEY TRY TO BUILD A CASE?

23 MS. GAROFALO: OBJECTION, YOUR HONOR.

24 HON. T.A. GREEN: SUSTAINED AS PHRASED.

25 MR. GOLDBERG:

26 Q WELL, SHE CAME TO YOU FOR HELP; RIGHT?

27 A YES.

28 Q AND YOU GAVE HER THERAPY FOR TWO YEARS; CORRECT?

1 A ABOUT.

2 Q IN YOUR PROFESSIONAL OPINION, IF SHE HADN'T  
3 GOTTEN THE HELP THAT YOU GAVE HER, WHAT WOULD HAVE  
4 HAPPENED TO HER?

5 A I DON'T -- THE FIRST THOUGHT IN MY MIND IS SHE  
6 MIGHT HAVE GONE OFF THE BRIDGE, BUT I DON'T KNOW.

7 Q OKAY. NOW --

8 A YOU'D HAVE TO ASK HER THAT.

9 Q WELL, YOU HAVE -- YOU SAW HER THAT FIRST TIME ON  
10 DECEMBER 20TH --

11 A YES.

12 Q -- OF 2016; RIGHT?

13 A YES.

14 Q YOU SAW THE CONDITION SHE WAS IN?

15 A AND I SAW HER IN THAT SIMILAR CONDITION MANY  
16 OTHER DAYS.

17 Q AND THAT CONDITION THAT YOU SAW, YOU'VE INDICATED  
18 THAT SHE HAD PTSD?

19 A THE FIRST SESSION I WOULDN'T HAVE CONCLUDED THAT.  
20 BUT YES.

21 Q RIGHT.

22 BUT YOU DID CONCLUDE THAT; RIGHT?

23 A YES. SOON AFTER, I DID.

24 Q NOW, I JUST WANT TO GO OVER A FEW THINGS.

25 NOW, COUNSEL BROUGHT UP THAT THERE WERE SOME  
26 INCIDENTS THAT HAPPENED WHEN SHE WAS A YOUNG CHILD THAT  
27 MANY PEOPLE WOULD DESCRIBE DIFFERENT WAYS, BUT THEY WERE  
28 PRETTY HARSH PUNISHMENTS YOU'VE SAID; CORRECT?

1 A CORRECT.

2 Q AND NOTWITHSTANDING THESE HARSH PUNISHMENTS, HOW  
3 DID THINGS EVOLVE FOR HER AS AN ADULT?

4 MS. GAROFALO: OBJECTION, YOUR HONOR, I -- THAT  
5 LACKS FOUNDATION.

6 HON. T.A. GREEN: THAT'S ALSO PRETTY VAGUE. I  
7 DON'T KNOW IF YOU CAN ANSWER THAT QUESTION.

8 MR. GOLDBERG: WELL, THE QUESTIONS ARE VAGUE.

9 Q WHEN SHE WAS 18 YEARS OLD, WHAT DID SHE DO?

10 A SHE BECAME A REPORTER IN ALASKA WITHOUT HER  
11 FAMILY'S SUPPORT.

12 Q WHEN SHE WAS 19 YEARS OLD, WHAT WAS SHE DOING?

13 A I THINK SHE MOVED UP AS A REPORTER TO SOME HIGHER  
14 LEVEL, BUT I DON'T KNOW THE SPECIFICS OFF HAND.

15 Q AND BEFORE HER 21ST BIRTHDAY, WHAT WAS SHE DOING?

16 A SHE HAD MOVED TO NEW YORK HOPING TO MAKE IT INTO  
17 THE ENTERTAINMENT BUSINESS, AGAIN, WITHOUT HER FAMILY'S  
18 SUPPORT.

19 Q AND FOR THE NEXT TEN YEARS, SHE WAS IN NEW YORK  
20 SUPPORTING HERSELF; CORRECT?

21 A SHE WAS.

22 MS. GAROFALO: OBJECTION. LACKS FOUNDATION.  
23 SUPPORTING...

24 MR. GOLDBERG:

25 Q BASED ON WHAT SHE TOLD YOU.

26 HON. T.A. GREEN: YEAH, WAIT, WAIT, WAIT.

27 CAN YOU ANSWER THAT QUESTION OR DO YOU KNOW THE  
28 ANSWER?

1 THE WITNESS: I MEAN, AS MUCH AS I KNOW ANYTHING,  
2 I KNOW THE ANSWER. I MEAN, ANYTHING ABOUT THAT.

3 HON. T.A. GREEN: I GOT THAT.

4 MR. GOLDBERG:

5 Q WHAT DID SHE DO FOR THE NEXT TWO YEARS?

6 A I'M SORRY, I GOT DISTRACTED.

7 Q WHAT DID SHE DO IN NEW YORK? WAS SHE WORKING?

8 A SHE WAS WORKING AT LOTS OF DIFFERENT JOBS. SHE  
9 WAS VERY RESOURCEFUL. SHE MET LOTS OF PEOPLE. SHE  
10 ENDED UP AS JIMMY FALLON'S SIDEKICK. SHE WAS A MODEL.

11 MS. GAROFALO: OBJECTION, YOUR HONOR.

12 HON. T.A. GREEN: SUSTAINED.

13 MR. GOLDBERG:

14 Q NOW, DOES THE HISTORY OF HER EMPLOYMENT, HOW DOES  
15 THAT FACTOR INTO WHAT YOU THINK ABOUT THESE EARLIER  
16 EXPERIENCES SHE HAD WITH HER FATHER?

17 A WELL, IT'S PART OF IT, BUT BECAUSE SHE USED WORK  
18 AS A COPING MECHANISM, IT'S NOT THE ONLY THING THAT  
19 MAKES ME THINK SHE WAS DOING WELL.

20 Q WHAT ELSE MAKES YOU THINK SHE WAS DOING WELL?

21 A SHE WASN'T ABUSING DRUGS, SHE WASN'T  
22 SELF-DESTRUCTIVE, SHE WASN'T CARELESS, SHE WASN'T  
23 GETTING IN -- SHE WASN'T DOING DANGEROUS THINGS. SHE  
24 WAS PLOTTING A COURSE IN HER LIFE PROFESSIONALLY AND  
25 PERSONALLY THAT FROM EVERYTHING I HEARD WAS REALLY  
26 IMPRESSIVE.

27 Q NOW, WE'VE HEARD A LOT ABOUT T.J. AND WE -- T.J.  
28 -- SHE DATED T.J. FROM WHAT TIME TO WHAT TIME?

1           A I THINK IT WAS 2007 TO 2010.

2           Q AND YOU -- IN YOUR NOTES, THERE'S REFERENCES TO  
3 T.J..

4                   DO YOU HAVE ANY OPINION AS TO HOW THESE  
5 EXPERIENCES WITH T.J., THE ABUSE THAT SHE SUFFERED, THE  
6 PHYSICAL VIOLENCE, HOW THEY IMPACTED HER AT THAT TIME?

7           MS. GAROFALO: VAGUE AND AMBIGUOUS AS TO WHAT  
8 TIME.

9           MR. GOLDBERG:

10           Q AT THE TIME AND DATE.

11           A CAN YOU BE MORE SPECIFIC?

12           Q YEAH.

13                   IN OTHER WORDS, AFTER SHE -- AFTER THEY -- ENDED  
14 THE RELATIONSHIP WITH T.J., HOW DID THE EXPERIENCES  
15 AFFECT HER?

16           A I THINK SHE BECAME MILDLY DEPRESSED. I DON'T  
17 KNOW IF SHE WAS CLINICALLY DEPRESSED, BUT I THINK SHE  
18 WAS UNHAPPY AND LOST, SHE HAD GIVEN UP A LOT OF HER  
19 CAREER, SHE WAS KIND OF HORRIFIED THAT SHE HAD BEEN WITH  
20 HIM. SHE WAS DOWN, IF NOT MILDLY DEPRESSED. I DON'T  
21 THINK IT MET CRITERIA FOR FULL DEPRESSION, BUT YOU MIGHT  
22 CALL IT DYSPHORIC BLUES FOR, I THINK, A COUPLE OF  
23 MONTHS.

24           HON. T.A. GREEN: I'M SORRY, WE HAVE TO HAVE OUR  
25 WEEKEND RECESS. I HAVE TO GET TO A MEETING IN PALM  
26 SPRINGS OF ALL THINGS. CONDOLENCES HAVE BEEN EXPRESSED  
27 BY MANY.

28                   ALL RIGHT. LOOK, YOU GUYS ARE REALLY DEDICATED

1 TO THIS CASE. I CAN TELL YOU'RE REALLY INTO IT AND I  
2 REALLY APPRECIATE THAT. IT IS AN INTERESTING,  
3 CHALLENGING CASE AND I HOPE TO WRAP IT UP, PROBABLY  
4 WE'LL ARGUE AND INSTRUCT ON TUESDAY NOW.

5 MS. GAROFALO: WILL YOU BE ORDERING HER TO COME  
6 BACK?

7 MR. GOLDBERG: YEAH.

8 HON. T.A. GREEN: BUT WE'RE AHEAD OF SCHEDULE AND  
9 THEN THE CASE WILL BE YOURS.

10 OKAY. KEEP IN MIND THE COURT'S ADMONITIONS.

11 DON'T DISCUSS THIS MATTER AMONG YOURSELVES OR  
12 WITH ANYONE ELSE. DON'T FORM OR EXPRESS ANY OPINION OR  
13 CONCLUSION UNTIL THE MATTER IS GIVEN TO YOU FOR  
14 DELIBERATION.

15 ONE ADDITIONAL THING, THERE HAS BEEN SOME PRESS  
16 COVERAGE OF THIS CASE. OBVIOUSLY, IF YOU SEE IT OR HEAR  
17 ABOUT IT, TUNE IT OUT, DON'T READ IT. OKAY. SEE YOU  
18 GUYS 9:30 ON MONDAY. OKAY. 9:30.

19 ON THE RECORD, THE JURY IS NOT PRESENT. COUNSEL  
20 IS PRESENT.

21 I THINK THEY ARE GOING TO NEED YOU.

22 THE WITNESS: NO, I MEANT RIGHT NOW. I KNOW,  
23 THEY ALREADY GAVE ME THE NEWS.

24 MR. GOLDBERG: YOU'LL COME BACK 9:30 ON MONDAY;  
25 RIGHT?

26 THE WITNESS: I'LL COME BACK 9:30 ON MONDAY.

27 HON. T.A. GREEN: OKAY. THANK YOU, DOCTOR,  
28 YOU'RE A SPORT.

1 ALL RIGHT. ON THE RECORD, THE JURY IS NOT  
2 PRESENT. COUNSEL IS PRESENT.

3 I APOLOGIZE FOR THIS FOLKS.

4 YOU MAY BE EXCUSED, DOCTOR. THANK YOU FOR BEING  
5 HERE.

6 THE WITNESS: OKAY.

7 HON. T.A. GREEN: NOW, I DO WANT TO GIVE DEFENSE  
8 AND PLAINTIFF, IF THEY WANT, IF YOU WANT TO MAKE A  
9 RECORD OF ANYTHING. I KNOW DEFENSE HAS ALREADY ASKED  
10 ME. PROBABLY THE BEST THING TO DO IS, I DON'T KNOW HOW  
11 MUCH MORE TIME YOU HAVE WITH THE DOCTOR AND THEN MR.  
12 DAVID, PROBABLY THE AFTERNOON IS BEST IF YOU WANT TO  
13 CALL WITNESSES ON YOUR MOTION.

14 I CAN PROBABLY GET THE DEPUTY SHERIFF HERE, SO --  
15 AND THEN YOU CAN MAKE WHATEVER RECORD YOU WANT TO MAKE.  
16 SO WE CAN DO THAT MONDAY. SO GIVEN THE FACT WE HAVE THE  
17 DOCTOR AND MR. DAVID AND A RECORD TO DO, I WOULD  
18 PROBABLY SAY WE'RE GOING TO ARGUE AND INSTRUCT ON  
19 TUESDAY.

20 MR. GOLDBERG: I THINK THAT'S CORRECT. I THINK  
21 THAT'S CORRECT.

22 MS. GAROFALO: THAT SOUNDS CORRECT.

23 HON. T.A. GREEN: AND WEDNESDAY IS AN ALL DAY  
24 HOLIDAY.

25 MR. GOLDBERG: IT IS, YOUR HONOR, IT IS.

26 HON. T.A. GREEN: SO YOU HAVE TO FINISH YOUR  
27 ARGUMENTS THEN ON TUESDAY.

28 MR. GOLDBERG: OKAY. WELL, WE'LL DO IT. I'M NOT

1 EXACTLY SURE WHAT'S -- THERE'S GOING TO BE A -- A DEPUTY  
2 IS GOING TO BE HERE TO TESTIFY AND THEY ARE GOING TO  
3 HAVE THE WITNESSES AND I DON'T EVEN UNDERSTAND WHAT --  
4 WHAT'S THIS?

5 HON. T.A. GREEN: WELL, IT'S PROBABLY A MOTION  
6 FOR A NEW TRIAL OR A MOTION FOR MISTRIAL.

7 MR. GOLDBERG: I DON'T KNOW WHAT IT IS.

8 MS. GAROFALO: YES, YOUR HONOR.

9 MR. GOLDBERG: WHAT'S THE MISTRIAL, YOUR HONOR,  
10 THERE WAS -- THERE WAS -- THE JURY WAS IS IN THE JURY  
11 ROOM AND THERE WAS SOME ALTERCATION IN THE HALL, I  
12 SHOULD SAY WHAT --

13 HON. T.A. GREEN: YOU KNOW. OKAY. I UNDERSTAND.

14 MR. GOLDBERG: AND MR. DAVID HAS BEEN ACTING OUT  
15 SINCE THE TRIAL BEGAN.

16 HON. T.A. GREEN: OKAY. BUT STILL I WANT TO GIVE  
17 ALL COUNSEL A CHANCE TO MAKE A FACTUAL RECORD, MAKE  
18 WHATEVER MOTIONS YOU WANT, SO...

19 MR. GOLDBERG: WELL, YOUR HONOR, IF THAT'S THE  
20 CASE, I ALSO WANT TO BE ABLE AT THAT TIME TO SHOW THE  
21 VIDEO THAT WE WANTED TO SHOW THE COURT OF HIS ACTIONS AT  
22 A DEPOSITION. BECAUSE THIS BUSINESS ABOUT HIM SAYING HE  
23 WAS NOT GOING TO ACT OUT AROUND ME, HE CAME TO MY OFFICE  
24 AND ACTED OUT LIKE A CRAZY PERSON.

25 HON. T.A. GREEN: ALL RIGHT. FINE. IF YOU WANT  
26 TO INCLUDE THAT AS PART OF THE MOTION, BE MY GUEST.

27 MS. GAROFALO: WELL, THAT HAS NOTHING TO DO --  
28 OUR MOTION IS NOT TO DEFEND MR. DAVID'S CONDUCT, IT'S

1           REALLY NOT ABOUT MR. DAVID'S CONDUCT.  IT'S ABOUT THE  
2           FACT OF THE PRESENCE OF MULTIPLE BAILIFFS IN A COURTROOM  
3           AND THE JURY WHO DIDN'T SEE WHAT HAPPENED, WHO JUST  
4           HEARD YELLING IN THE HALLWAY, BUT HAD NO IDEA WHAT WAS  
5           GOING ON, THAT IT WAS PRECIPITATED AND THE COURT MIGHT  
6           FIND JUSTIFIABLY OR NOT, BUT BY THIS INCIDENT WITH THE  
7           BAILIFF, IT HAS NOTHING TO DO WITH -- WE'RE NOT TRYING  
8           MR. DAVID'S CONDUCT.  HE DID WHAT HE DID.

9                   HON. T.A. GREEN:  OKAY, YEAH, I KNOW.  I DON'T  
10            AWAY TO ARGUE THIS NOW.

11                   MR. GOLDBERG:  YEAH.

12                   HON. T.A. GREEN:  BUT ACTUALLY, IT IS A LITTLE  
13            BROADER THAN WHAT HAPPENED JUST IN THAT ONE INCIDENT.

14                   MR. GOLDBERG:  THAT'S RIGHT.

15                   HON. T.A. GREEN:  YOU KNOW, THIS HAS BEEN A  
16            CHALLENGING EXPERIENCE FOR BENCH OFFICERS.  AND I THINK  
17            ONE PAPER SAID IT SHOWED THAT THE COURTS ARE  
18            ILL-EQUIPPED TO HANDLE PEOPLE ON THE WITNESS STAND WHO  
19            ARE UNCONVENTIONAL.  AND I HAVE TO SAY IN 47 YEARS OF A  
20            VERY, VARIED PRACTICE, I HAVE NEVER SEEN THIS AND AS A  
21            CONSEQUENCE, YOU KNOW, WE -- WE HAD CONFERENCE TO THIS  
22            BEFORE TRIAL.  BEFORE I EVER GOT THE CASE, WE WERE  
23            ANTICIPATING HOW -- AND STRATEGIZING HOW TO PROVIDE A  
24            FORUM WHERE EVERYBODY COULD BE HEARD AND WHERE IT COULD  
25            BE HEARD IN A CONGENIAL MANNER OR AS CONGENIAL AS  
26            POSSIBLE, CERTAINLY AS PROFESSIONAL AS POSSIBLE, AND IT  
27            HAS POSED A CHALLENGE, AND I THINK IT'S POSED A  
28            CHALLENGE FOR THE SHERIFF'S OFFICE AND I CAN TELL YOU,

1 IT'S POSED A CHALLENGE FOR THE BENCH.

2 ACTUALLY, IT IS A LITTLE BROADER PROBLEM THAN  
3 JUST WHAT HAPPENED YESTERDAY. BUT --

4 MS. GAROFALO: BUT ON THE MISTRIAL, IT'S NOT  
5 RELEVANT TO THE ISSUE THAT'S BEING RAISED IN A MISTRIAL  
6 MOTION. I MEAN, IT WASN'T EVEN IN THIS CASE, THIS  
7 DEPOSITION.

8 MR. GOLDBERG: DISAGREE, YOUR HONOR, IT'S  
9 RELEVANT.

10 HON. T.A. GREEN: OKAY, GUYS, TIMEOUT, TIMEOUT.  
11 MERCY ON ME, I HAVE TO TAKE THE I-10 TO LA QUINTA, SO...

12 MS. GAROFALO: YOU'LL HAVE PLENTY OF TIME TO  
13 THINK ABOUT THIS.

14 HON. T.A. GREEN: YEAH, BUT I WANT YOU GUYS TO  
15 EXPLORE ALL FACTUAL ISSUES AND LEGAL ISSUES. I THINK  
16 THIS CASES AND THESE CASES PROBABLY WILL HAVE A LIFE  
17 BEYOND THE TRIAL.

18 MR. GOLDBERG: YOUR HONOR, HOLD ON JUST A SECOND,  
19 YOUR HONOR, THERE'S A -- WHAT IS THIS, WHAT IS THIS?

20 MS. REEVES: IT LOOKS LIKE A RECORDING DEVICE ON  
21 HIS INSTAGRAM BECAUSE HE POSTED ON HIS STORY FROM THE  
22 COURTHOUSE.

23 MR. GOLDBERG: NEVER MIND, YOUR HONOR, I DON'T  
24 WANT TO KEEP YOU.

25 HON. T.A. GREEN: ALL RIGHT. GUYS, HAVE A GREAT  
26 WEEKEND. I REALLY APPRECIATE YOUR EXCELLENT WORK IN A  
27 DIFFICULT CASE.

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(AT 3:20 P.M., PROCEEDINGS WERE ADJOURNED UNTIL  
MONDAY, OCTOBER 7, 2019, AT 9:30 A.M.)

(THE NEXT PAGE NUMBER IS 3901.)

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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES

DEPARTMENT 14

HON. TERRY A. GREEN, JUDGE

LAUREN REEVES,

PLAINTIFF,

VS.

HOLOGRAM U.S.A., INC., ALKI  
DAVID PRODUCTIONS, INC.,  
ALKIVIADES DAVID, AN INDIVIDUAL;  
AND DOES 1 THROUGH 25,  
INCLUSIVE,

DEFENDANTS.

)  
)  
)  
) NO. BC643099

)  
) DCA NO. B304975

)  
) REPORTER'S CERTIFICATE

I, JEANESE JOHNSON, CSR NO. 11635, CERTIFIED  
SHORTHAND REPORTER PRO TEMPORE, OF THE SUPERIOR COURT OF  
THE STATE OF CALIFORNIA, FOR THE COUNTY OF LOS ANGELES,  
DO HEREBY CERTIFY THAT THE FOREGOING PAGES, 3601 THROUGH  
3806-3900; 3901 THROUGH 4052-4200, COMPRISE A FULL, TRUE  
AND ACCURATE TRANSCRIPT OF THE PROCEEDINGS AND TESTIMONY  
TAKEN IN THE ABOVE-ENTITLED CAUSE ON OCTOBER 4, 2019 AND  
OCTOBER 7, 2019.

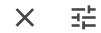
DATED THIS 1ST DAY OF AUGUST, 2020.

  
\_\_\_\_\_  
JEANESE JOHNSON, REPORTER PRO TEMPORE

CSR NO. 11635



fred.heather@



Compose

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Input field with envelope icon

I have never once had my day in Court Leah. Imagine that - a handful of orchestrated sexual harassment claims. Two of which were dropped became "unfair dismissal" complaints, after three years of dragging my name and my companies through the proverbial mud.

Due to the systemic corruption of the Judicial System at the Stanley Mosk Court House, and the State Bar, I have never once had my day

Imagine that Leah. Even when I represented myself against Lisa Bloom (Elizabeth Taylor V Alkiviades David) The Jury returned 8 - 4 in my favor. A Fraud on the Court. Despite the Court being loaded from the Start as Lisa Bloom would commit perjury in wholesale.

In my case Self-governing Judges who have been corrupted by Girardi et al; Judge Michelle Williams Court or Judge Yolanda Orozco for conflicts with adjudicating cases like mine. Extreme egregious reasons. Regardless, these people are openly extorting me in Court hiding

Although the FBI have and continue to investigate these matters; 70 k a year is not often enough for these men and women to care to go California.

Therefore it is left to people like myself who have had enough of being trafficked through this broken criminal system the State Bar is meant to build a strong team of lawyers including Alan Dershowitz, Blair Berk, Dana Cole, Glaser Weil Firm. I have several other firms in Switzerland I am filing criminal prosecutions. They are at various stages of imminence.

In these affairs I am righteous Leah. There are many whistleblowers and ex employees who have never been voiced due to the corrupter recanted or have been coerced by these people and have written adjudicated affidavits in my support.

My strength is my transparency and I expect to prevail in all matters relating to the State Bar of California and its corruption.

Therefore please reach out to me or any one of my representatives and let's try to collaborate rather than continue down this dark road for

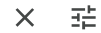
Despite my bullishness, my experience has been at times terrifying. I have even had run-ins with the Sheriff's department in and out of California Blooms manipulation of the Court System.

I have no criminal record anywhere in the world. The most jail time I've done is 1 day for importing hemp to St Kitts. Which ironically turns jurisdiction issuing "red notices" on Girardi, Boom Allred et al.

Reply
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😊



fred.heather@



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Barbara Burke  
T: 602-576-0468

On Tue, Sep 13, 2022 at 8:11 AM Barbara Burke <barbaramburkewriter@gmail.com> wrote:

Thank you Alban for this information. I will speak with Ronda today. I only joined helping Alki in June, so I was not privy to all your Spring correspondence. I do have one question - when there is liquidation of an asset, such as here, can the debtor or family bid on the auctioned home so as to keep it in the family? That is the case here in the U.S.

Sincerely,  
Barbara Burke  
T: 602-576-0468

On Tue, Sep 13, 2022 at 1:10 AM Alban Shabani <a.shabani@weinmann-zimmerli.ch> wrote:

Dear all

Regarding the debt enforcement proceedings the issue is not that the case in the USA is still going on. The problem at hand is that after we have filed the appeal against the grant of the debt enforcement. With respect to this, I had inquired since February 2021 the Californian Judgement. At the time, I was informed that there are no legal means to attack the Californian Judgement.

According to Swiss law, we have reached now a stage where no new evidence will be considered. This already applied at the moment if the TRO would have been granted, the appeal court would have been likely to stay the execution of the debt enforcement, both in the USA either. As the TRO has been denied the appeal court decided to move forward and is now in the process of writing the

Swiss procedural law required that we should have attacked the Californian Judgement latest at the time when the Swiss attorney's request for debt enforcement shall be granted. I have raised this issue several times in the previous correspondence. As our federal complaint was denied in the debt enforcement proceedings, we could neither argue nor demand a stay until the final judgement is rendered by the federal court. The federal court does not have the right to decide upon the stay of the proceedings now as this issue had not been raised before court of first instance. If granted, the appeal court could have stayed the enforcement.

For these reasons, the debt enforcement office Oberland of the Canton Berne is now in the process of executing the debt enforcement process. Therefore, debt enforcement office Oberland of the Canton Berne will proceed with the sale of Alki's property in Gs...



fred.heather@ dimitra wexler



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I, Alkiviades David, on behalf of myself and my minor sons, Nikola David and Tino David, hereby file this lawsuit against Rebecca David, David, Douglas Mikkonen, and Bridgeford Trust Company (hereinafter referred to as "Defendants"). We are the beneficiaries of the Harm North Dakota.

The purpose of this lawsuit is to address the egregious misconduct, fraudulent actions, and severe violations of both trust law and the An by the Defendants, who have conspired to manipulate and exploit the Harmonia Trust.

**Background:**

1. The Defendants, Rebecca David, and Judd Tully, initially pressured me, Alkiviades David, due to unrelated legal issues involvin relinquish my position as the protector of the Harmonia Trust.
2. Simultaneously, this syndicate of predatory lawyers, who were also involved in an antitrust lawsuit initiated by me, began worki representing Bridgeford Trust Company, the corporate trustee of the Harmonia Trust. This collaboration was aimed at comprom seizing control of the trust.
3. Throughout this conspiracy, over \$10 million in cash and an additional \$79 million in trust assets were either stolen or unlawfully
4. Similar cases of trust litigation will be presented as examples of the Defendants' misconduct, illustrating the patterns of behavio

**Abuse of Mental Condition:**

1. My brain trauma, though manageable and allowing me to maintain a successful life, has been continuously exploited and exace
2. A four-hour interview with Dr. Wexler of California, financed by Rebecca David, was conducted to undermine my mental health their actions.

**Fraud and Violations of the American Disabilities Act:**

1. This lawsuit centers on the fraud perpetrated by the Defendants in manipulating the Harmonia Trust for their personal gain.
2. Furthermore, the Defendants' actions are in direct violation of the American Disabilities Act of 2008, as they have targeted and benefit.

In light of the above, we seek restitution, damages, and legal intervention to rectify the wrongful actions committed by the Defendants. W this case, as it not only concerns financial misconduct but also the abuse of a disabled individual's rights.

Sincerely,

[Your Name]





leventis



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Deal is off. ▶ Inbox x



**Swissx Labs AG - General** <swissxcbd@gmail.com>

Thu, Jan

to me, christo.leventis, ninos.yamakias

Guys, I told you not to fuck me around you fuck me around again you are ridiculous people

The deal is off.

[www.Swissx.com](http://www.Swissx.com)

SwissX Labs AG



**Swissx Labs AG - General** <swissxcbd@gmail.com>

Fri, Jan

to me, christo.leventis, ninos.yamakias

I spoke to Themis. Who the message was intended for

I told him the final offer was ridiculous and I feel abused by my own family. Seems that corrupt American assholes is not enough for you.

I don't appreciate being blocked by your email server either. In fact I find that as a real slap in the face.

Seems like you have zero ethics - why I don't really understand. You don't need to be a cunt Christo but you have been at all times. Une

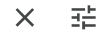
Add another two million and I'm ok.

I feel fucked that I have to do this but life is long and I will recover everything that's been stolen from me and wreck revenge on those w

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## SETTLEMENT AGREEMENT AND MUTUAL RELEASE

This Settlement Agreement and Mutual Release (hereinafter, the “Agreement”), dated as of July 23, 2019 (the “Effective Date”), is entered into by and between FilmOn.com, Inc. (“FilmOn”), a Delaware corporation, on the one hand, and DoubleVerify, Inc. (“DoubleVerify”), a Delaware corporation, on the other hand. FilmOn and DoubleVerify are each referred to individually as a “Party” and collectively as the “Parties.”

### Recitals:

A. WHEREAS, on October 27, 2014, FilmOn filed a lawsuit against DoubleVerify captioned *FilmOn.com, Inc. v. DoubleVerify, Inc.*, in the Superior Court for the County of Los Angeles (the “Superior Court”), Case No. BC561987 (the “Action”). FilmOn filed an amended complaint on November 24, 2014, alleging causes of action for trade libel, tortious interference with contract, tortious interference with prospective economic advantage, unfair competition, false advertising, slander, and negligence against DoubleVerify arising from statements allegedly made about FilmOn in DoubleVerify reports.

B. WHEREAS, on April 22, 2015, the Superior Court granted DoubleVerify’s anti-SLAPP special motion to strike (the “Motion”) FilmOn’s First Amended Complaint, thereby dismissing the action.

C. WHEREAS, on May 13, 2015, FilmOn appealed the Superior Court’s order granting the Motion. On June 29, 2017, the Court of Appeal for the Second District affirmed the Superior Court’s order granting the Motion (Court of Appeal, Case No. B264074).

D. WHEREAS, on September 4, 2017, FilmOn petitioned the California Supreme Court (the “Supreme Court”) for review, which review the Supreme Court granted on or about November 15, 2017 (Supreme Court, Case No. S244157).

E. WHEREAS, on May 6, 2019, the Supreme Court reversed the Court of Appeal’s decision and reversed the underlying Superior Court ruling granting the Motion. The remittitur issued and the Action was transferred back to the Superior Court on or about June 12, 2019.

F. WHEREAS, in order to avoid the expenses and uncertainty of continuing litigation, the Parties desire to and have reached a resolution of all disputes between them through a dismissal of the Action on the terms set forth in this Agreement.

NOW, THEREFORE, the Parties adopt the foregoing recitals as part of this Agreement and as a statement of their intent, and in consideration of the mutual obligations set forth below, and for other good and valuable consideration, the receipt and adequacy of which are hereby acknowledged, the Parties hereby agree as follows:

1. **Dismissal of Action.** Within five (5) business days of execution of this Agreement by all Parties, the Parties shall file a joint stipulation and proposed order for dismissal of the Action in its entirety with prejudice in a mutually agreeable form.

2. **Mutual Releases.**

a. Upon execution of this Agreement by all Parties, for good and valuable consideration, the receipt and adequacy of which is hereby acknowledged, FilmOn, on behalf of itself and its predecessors, successors, assigns, heirs, alter egos, d/b/a's, parents, subsidiaries, divisions, affiliates, partners, owners, members, shareholders, principals, officers, directors, associates, employees, agents, attorneys, advisors, representatives and insurers, and each of them, past and present, hereby irrevocably, unconditionally and completely release and discharge DoubleVerify and its predecessors, successors, assigns, heirs, alter egos, d/b/a's, parents, subsidiaries, divisions, affiliates, partners, owners, members, shareholders, principals, officers, directors, associates, employees, agents, attorneys, advisors, representatives and insurers, and each of them, past and present, from any and all actions, causes of action, suits, debts, dues, sums of money, accounts, reckonings, bonds, bills, specialties, covenants, contracts, controversies, agreements, promises, variances, trespasses, damages, judgments, extents, executions, claims and demands of any kind or character, known or unknown, from the beginning of time through and including the Effective Date of this Agreement.

b. Upon execution of this Agreement by all Parties, for good and valuable consideration, the receipt and adequacy of which is hereby acknowledged, DoubleVerify, on behalf of itself and its predecessors, successors, assigns, heirs, alter egos, d/b/a's, parents, subsidiaries, divisions, affiliates, partners, owners, members, shareholders, principals, officers, directors, associates, employees, agents, attorneys, advisors, representatives and insurers, and each of them, past and present, hereby irrevocably, unconditionally and completely release and discharge FilmOn and its predecessors, successors, assigns, heirs, alter egos, d/b/a's, parents, subsidiaries, divisions, affiliates, partners, owners, members, shareholders, principals, officers, directors, associates, employees, agents, attorneys, advisors, representatives and insurers, and each of them, past and present, from any and all actions, causes of action, suits, debts, dues, sums of money, accounts, reckonings, bonds, bills, specialties, covenants, contracts, controversies, agreements, promises, variances, trespasses, damages, judgments, extents, executions, claims and demands of any kind or character, known or unknown, from the beginning of time through and including the Effective Date of this Agreement.

**3. Civil Code 1542 Waiver.** It is the intention of the Parties to extinguish all claims between and among the Parties and, consistent with such intention, the Parties waive and relinquish any and all rights, to the extent permitted by law, under Section 1542 of the California Civil Code, if applicable, or any other applicable similar state law, federal law or principle of common law, which may have the effect of limiting the releases set forth in Paragraph 2 of this Agreement. Section 1542 of the California Code provides:

**A GENERAL RELEASE DOES NOT EXTEND TO CLAIMS WHICH THE CREDITOR DOES NOT KNOW OR SUSPECT TO EXIST IN HIS OR HER FAVOR AT THE TIME OF EXECUTING THE RELEASE, WHICH IF KNOWN BY HIM OR HER MUST HAVE MATERIALLY AFFECTED HIS OR HER SETTLEMENT WITH THE DEBTOR.**

The Parties acknowledge that they may hereafter discover claims or facts in addition to or different from those which they now know or believe to exist with respect to the subject matter of this Agreement and which, if known or suspected at the time of execution, may have materially affected this settlement. Nevertheless, in making this voluntary express waiver of

rights under Section 1542 of the Civil Code of California (or similar laws of other jurisdictions), the Parties acknowledge that it is their intention to fully and forever settle and release each other from the claims subject to this release, whether known or unknown, and herein release and specifically waive and relinquish any right or benefit which they may have under Civil Code Section 1542 (or any similar law of any other jurisdiction) to the full extent that they may lawfully waive such right or benefit.

The Parties further agree and acknowledge that the Mutual Releases in Section 2 do not release, compromise, or otherwise affect the obligations imposed by this Agreement.

**4. Confidentiality.** This Agreement, and the facts and circumstances underlying its creation, are confidential. The Parties hereby agree and covenant not to disclose to any third party the terms and conditions of this Agreement or its underlying facts or circumstances, except as expressly provided herein or required by law or court order, and to independent auditors, bankers, attorneys, financial institutions and accountants who require the information and who agree to maintain such information on a confidential basis. Notwithstanding the foregoing, any Party may respond to any inquiries from the press or other third parties about this Action by representing that the Parties have settled this Action on mutually agreeable terms which are to remain confidential and the Parties plan to focus on their respective business operations.

**5. Miscellaneous Provisions.**

a. **No Admission of Wrongdoing.** The Parties acknowledge that, by entering into this Agreement, they do not admit any liability or wrongdoing whatsoever.

b. **Integration.** This Agreement sets forth the entire agreement and understanding among the Parties as to the subject matter hereof and supersedes any prior understanding or agreement. This Agreement may be amended, supplemented or modified only by a writing signed by each of the Parties. The Agreement is binding upon and shall inure to the benefit of each Party, and to each of its successors, heirs, or assigns.

c. **Authority.** The Parties hereby respectively represent and warrant that they have the power and authority to execute and deliver this Agreement and to perform their respective obligations hereunder, and that the execution, delivery and performance of this Agreement has been duly and validly authorized. The individuals whose signatures appear below on behalf of each of the Parties, respectively, represent and warrant that they are authorized to execute this Agreement on behalf of each Party, respectively, and that the execution and delivery of this Agreement is a duly authorized and binding act of each of the Parties, respectively.

d. **Governing Law; Venue.** This Agreement shall be governed by, construed, and interpreted in accordance with the laws of the State of California, without regard to any conflict of law principles. The Parties agree that any dispute related to this Agreement shall be heard in the Superior Courts of California, County of Los Angeles.

e. **Attorneys' Fees.** Each Party hereto agrees to bear its own attorneys' fees and costs incurred up to and including the execution of this Agreement. However, in any action

to enforce the terms of this Agreement, the prevailing Party shall be entitled to an award of its reasonable attorneys' fees.

f. **Severability and Enforceability.** If a court of competent jurisdiction decides that any provision of this Agreement is not enforceable in the manner set forth in this Agreement, the Parties agree that it is their intention that such provision should be enforceable to the maximum extent possible under applicable law, and that such provision shall be reformed to make it enforceable in accordance with the intent of the parties. If any provision of this Agreement is held to be invalid or unenforceable, such invalidation or unenforceability shall not affect the validity or enforceability of the other portions of the Agreement.

g. **Knowing and Voluntary Agreement.** The Parties acknowledge that they have read this Agreement carefully, fully understand the meaning of the terms of this Agreement, and are signing this Agreement of their own volition, knowingly and voluntarily. Each Party acknowledges and agrees that it entered into this Agreement after full and fair negotiations in which each Party was represented by counsel.

h. **Independent Legal Advice.** Each of the Parties agrees that it has received independent legal advice from its attorneys with respect to the rights and asserted rights arising out of the controversies between the Parties relating to the disputes being settled herein. Each of the Parties further agrees that such Party and its counsel have had adequate opportunity to make whatever investigation or inquiry they may deem necessary or desirable in connection with the subject matter of this Agreement, prior to the execution hereof.

i. **Ambiguity; Jointly Drafted.** The Parties agree this Settlement has been jointly drafted by all Parties and their respective counsel; in the event that any terms of this Agreement are found to be ambiguous, such ambiguity shall not be construed against any particular Party.

j. **Headings.** The headings used herein are for organizational purposes and the convenience of the Parties only and have no meaning or other significance in interpreting, applying or enforcing the Agreement.

k. **Execution in Counterparts.** This Agreement may be executed with one or more separate counterparts, each of which, when so executed shall, together, constitute and be one and the same instrument. A fax, electronic and/or scanned PDF signature of a signed counterpart shall be deemed an original and shall have the same force and effect as if it were a signed original.

UNDERSTOOD, AGREED AND ACCEPTED:

FILMON.COM, INC.

DOUBLEVERIFY, INC.

BY: \_\_\_\_\_

BY: \_\_\_\_\_

NAME: \_\_\_\_\_

TITLE: \_\_\_\_\_

DATE: \_\_\_\_\_

NAME: \_\_\_\_\_

TITLE: \_\_\_\_\_

DATE: \_\_\_\_\_



**Self Referral**

**Name:** David, Alkiviades  
**MRN #:** 376807  
**DOB:** 05/23/1968  
**Exam Date:** 04/01/2023 17:26  
**Referring Phys.:** Self Referral

**NEUROQUANT VOLUMETRIC ANALYSIS**

**HISTORY**

This is a 54-year-old male with a history of head trauma. The patient has memory loss.

**TECHNIQUE**

This study was performed at Medical Imaging Center of Southern California, Santa Monica.

Using a 3T Siemens Scanner, the following sequences were obtained:

- 1) 3D MPRAGE.
- 2) Volumetric Analysis using FDA-approved techniques.

**FINDINGS**

There is considerable bilateral volume loss in the temporal lobes two standard deviations below normal. This finding is also seen in the lateral occipital lobes.

There is significant volume loss in the right superior frontal lobe 7th percentile as well as in the cortical gray matter, right worse than left.

**OVERALL IMPRESSION**

In evaluating the patient's MRI studies, it is clear that there is significant post traumatic change in the left frontal lobe where there is diminished perfusion on the ASL, diminished volume on the Neuroquant study. This patient may benefit from TMS using Neuronavigation.

summary pages

**Bradley A. Jabour , M.D.**  
**Senior Member of ASNR**

Signed Date: 04/05/2023 05:15 PM



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## DECLARATION OF DANIEL JACKSON

I, Daniel Jackson, declare:

1. I have personal knowledge of the facts stated below, and if called as a witness, I would and could testify competently to them.
2. I have known Mr. Rovier Carrington since at least 2004, and I am proud to call him a friend.
3. In the summer of 2006, Mr. Carrington auditioned for “Parental Control” and “Next” at MTV headquarters in Santa Monica, CA.
4. Mr. Carrington met Mr. Brian Graden while leaving the audition, in which Mr. Graden followed Mr. Carrington outside the building to inquire about his age and to ask him to dinner.
5. Mr. Graden discovered Mr. Carrington was underage, however, he insisted they have dinner to discuss Rovier’s future with Viacom, as Brian explained he was “an important man” in the company.
6. During the evening of the audition day, I drove with Mr. Carrington to Mr. Graden’s Hollywood Hills home, which was placed behind a gate and long driveway.
7. Mr. Carrington was hesitant to engage with Mr. Graden inside his home, as Rovier expected to discuss business with Mr. Graden at a restaurant.
8. I witnessed Brian greet Rovier in slacks, a t-shirt and short brown hair near the front entrance of Mr. Graden’s glass home.
9. I saw Mr. Carrington immediately after he exited Mr. Graden’s home, which was about two-hours later. Rovier’s face and legs were bloody, as he was terror-stricken and weeping while telling me what occurred inside Brian’s home.
10. Mr. Carrington said, Mr. Graden made him feel comfortable in the first five-minutes by relating over current events and by Brian mentioning his role in TV series, “South Park”.
11. Mr. Carrington said Mr. Graden prepared cocktails while discussing his accomplishments,

1 however, Brian's conduct altered after he insisted Rovier drink with him.

2 12. Mr. Carrington explained how he became lightheaded and ill after a sip or two – and asked Mr.  
3 Graden for help, but Brian began kissing and massaging him.

4 13. Mr. Carrington explained how Mr. Graden placed him over his shoulders and carried him to an  
5 upstairs bedroom while he was in/out of consciousness.

6 14. Mr. Carrington said Mr. Graden threw him onto a bed in a dim room and began removing  
7 both of their clothes despite Mr. Carrington begging him to stop.

8 15. Mr. Carrington said while he was in/out of consciousness, Mr. Graden beat him in the face and  
9 neck with an opened and closed fist while yelling, "Other boys Mr. Carrington's age obeyed orders".

10 16. Mr. Carrington said Mr. Graden did not use protection while inside his rectum – and that the  
11 intercourse was so rough; he bled throughout, which caused long-term damage. I was told Mr. Graden  
12 recorded the rape for enjoyment – and told Rovier to remain silent, if he wanted to be a star.

13 17. Mr. Carrington told me he was too frightened to tell his parents, as his first sexual experience  
14 was now with a man who raped him - and due to Brian telling him no one would believe him.

15 18. Mr. Graden returned into Mr. Carrington's life in the summer of 2014 after Mr. Graden  
16 reached out to Rovier on a social site where Mr. Graden apologized for raping him.

17 19. Mr. Carrington informed Mr. Graden he was working with HBO regarding a dark comedy he  
18 created – in addition to a Reality Show he also created, by which Mr. Graden offered Rovier a deal  
19 with Graden Media to produce his shows, which had wealthy young-adults of celebrities attached.

20 20. Mr. Carrington tried to maintain a business only relationship with Mr. Graden, but once Brian  
21 demanded they have sex, Brian then requested Rovier become his 2<sup>nd</sup> boyfriend, as his 1<sup>st</sup> boyfriend  
22 was well-known Photographer, Ted Sun.

23 21. Mr. Carrington dated Mr. Graden for two-years between 2014-2016.  
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1 22. Mr. Graden physically, sexually and emotionally abused Mr. Carrington throughout their  
2 relationship – and would threaten to have Mr. Carrington blacklisted, if he ever departed their  
3 foundation or told authorities about his behavior – including, the weekly underage sex parties Mr.  
4 Graden would have at his home, which were arranged by Mr. Graden’s 1<sup>st</sup> Boyfriend, Ted Sun. The  
5 party’s guest list included, known Hollywood Moguls and Mr. Graden’s attorney, Larry Stein.  
6

7 23. Mr. Carrington told me that Mr. Graden would regularly drug him with GHB placed inside his  
8 cocktails without his consent - and how Mr. Graden would allow his friends and his attorney, Larry  
9 Stein to have unprotected sex with Mr. Carrington while he was unconscious in their bedroom.

10 24. I have personally seen videos in Mr. Graden’s MacBook of Mr. Graden and Larry Stein raping  
11 an unconscious Mr. Carrington - and what appeared to be, unconscious teenage-boys.  
12

13 25. During the summer of 2015, I went with Rovier, Alex Vega, and Actor, [Redacted], to Mr.  
14 Graden's house. Brian was having a "sex party", with over two-dozen naked males, ranging from ages  
15 15-55-years-old - and they were having unprotected group sex, which was being recorded by Ted Sun.  
16

17 26. Mr. Carrington, and I felt extremely uncomfortable at this party - and did not want to  
18 participate, whatsoever, and wanted to leave.

19 27. When we attempted to exit, Mr. Graden screamed at Mr. Carrington, physically attacking  
20 him, and threatened that if he left the party, his reality show would never be made.

21 28. Mr. Graden grabbed Rovier by the neck, and pushed him to the side of the party, near the  
22 front of the house. I followed them, and got into an argument with Graden, and we were about ready  
23 to get into a physical altercation and fight. At that point, Rovier interceded, and the two of us backed  
24 down - and I dragged Rovier out of Graden's house, and we left.  
25

26 29. In late 2017, I interviewed with Debra Birnbaum of Variety regarding the horrible acts Brian  
27 Graden committed against Mr. Carrington. I confirmed to Debra that Brian raped, drugged, and  
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1 physically and emotionally abused Rovier over a decade's time. Debra asked me about Mr. Graden's  
2 and Rovier's working relationship, by which I explained Brian stole "Finding Prince Charming" from  
3 Rovier and tried to buy his silence by producing Mr. Carrington's dark comedy, "Heiristocracy",  
4 however, Brian became vexed and beat Rovier in September 2017 and blacklisted him. Debra thanked  
5 me for my confirmation and said several others have confirmed Brian's misconduct.

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7 30. During October 2019, Rovier expressed to me that Brian Graden and his attorney, Larry Stein  
8 were making threatening phone calls to him – and saying he'd be harmed if he continued his criminal  
9 reports against them or showed up to court in New York. Rovier said he received calls from Viacom's  
10 attorney's as well – and he was scared for his life, given they said they'll hire a Fixer to murder him.

11 31. I am also aware of Mr. Carrington's relationship with Mr. Sumner Redstone.

12  
13 32. In late October 2010, I went to Paramount Pictures with Jeremy Escherich, as Rovier was feet  
14 away in Sumner Redstone's town car. Sumner demanded Rovier meet with him to discuss his loyalty  
15 to the company. Once Mr. Carrington exited the car, his pants were undone and his belt was loosened.  
16 Rovier explained Sumner had removed his pants and massaged his penis without permission. Rovier  
17 said he was in shock and said stop, however, Sumner wanted to size him up for Brad Grey – and told  
18 him, his projects would be released if he could be loyal and remain silent. I saw Sumner wave at  
19 Rovier, as he drove away.

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21 33. I am also aware of Mr. Carrington's relationship with Mr. Brad Grey.

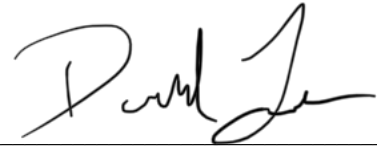
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23 34. Mr. Grey sexually assaulted and stalked Mr. Carrington on several occasions from November  
24 2010 – February 2017. I witnessed Brad force himself on Rovier while in Mr. Grey's car after their  
25 first meeting, and again in January 2011 at the Golden Globes, which led to Brad raping Rovier in a  
26 suite, while I stood outside the room with Jeremy, and again after Rovier complained about Brad's  
27 close friend, Harvey Weinstein raping him after a meeting Sumner Redstone and Brad Grey arranged  
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between Harvey and Mr. Carrington. Brad and Sumner threatened Rovier's life in front of me – and tired to force him into signing an NDA and accepting hush money, by which Rovier refused.

I declare under penalty of perjury under the laws of the State of California, and under the laws of the United States, that the foregoing it true and accurate.

Executed this \_\_\_ day of October 2019.



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Daniel Jackson, declarant.

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## DECLARATION OF ALEX VEGA

I, Alex Vega, declare:

1. I have personal knowledge of the facts stated below, and if called as a witness, I would and could testify competently to them.

2. I was casted by Mr. Rovier Carrington for his reality show "The Life of a Trendsetter" in 2014, by which Mr. Carrington created and Executive Produced.

3. My involvement with the show ended when Mr. Carrington agreed to work with Mr. Brian Graden instead of the original Showrunner.

4. I am also aware of Mr. Carrington's relationship with Mr. Brian Graden.

5. Mr. Carrington expressed to me, Mr. Graden raped him when he was underage – and that Brian felt he owned Rovier because he was his first sexual encounter.

6. Throughout 2014 and 2017, Mr. Carrington told me on multiple occasions, that Mr. Graden had drugged him prior to having unprotected sex with him, and that Brian recorded videos of their sexual encounters numerous times, without Rovier's consent. Rovier reiterated to me that he was terrified of Brian, and his attorney, Larry Stein as they had both committed horrible acts to keep people silent. Rovier explained how he had to keep a good attitude in fear of Brian releasing the sexual videos online or worst, having Mr. Carrington blacklisted or harmed.

7. During the summer of 2015, I went with Mr. Carrington, Daniel Jackson, and Actor, [Redacted], to Mr. Graden's house for an industry party, however, Brian was hosting a "sex party", with twenty-thirty naked males. The males were between 15-50-years-old. Brian was having unprotected group sex, which was being recorded by Brian's other boyfriend, photographer Ted Sun.

8. I became infuriated after learning I was invited to such an improper gathering – and by the looks of Mr. Carrington; I knew he wasn't aware of the kind of party we were entering.

1 9. When Mr. Carrington, Daniel Jackson, [Redacted], and I attempted to leave, Mr. Graden  
2 grabbed Rovier by the neck, and pushed him against the wall, near the front of the house. Brian  
3 threatened Rovier's life and career, telling him, his shows would not be produced if he mentioned the  
4 nature of Mr. Graden's party.

5 10. I am also aware of Mr. Carrington's relationship with Mr. Brad Grey.

6  
7 11. On the evening of November 6, 2016, I was with Rovier and witnessed Brad and Cassandra  
8 Grey, outside of "Dan Tanas" restaurant in West Hollywood. Brad yelled for Rovier's attention. Brad  
9 pulled Rovier into him - offered to take Rovier to China to the premiere of Paramount's film "Allied",  
10 however, when Rovier refused the invitation, Brad became argumentative while grabbing Roiver's  
11 penis. Brad began threatening Rovier, and I distinctly recall Brad saying to Rovier, "Without me or  
12 Paramount fucking you, your career will never succeed". Brad and his wife laughed and walked away.

13  
14 12. In late 2017, I interviewed with Debra Birnbaum of Variety regarding the sexual assaults  
15 committed by Brian Graden against Mr. Carrington. I confirmed to Debra that Brian raped, drugged,  
16 and physically abused Rovier over a decade's time. Debra asked about Brian's and Rovier's working  
17 relationship, by which I explained Brian stole "Finding Prince Charming" from Rovier and tired to  
18 buy his silence by producing Rovier's dark comedy, "Heiristocracy", however, Brian became enraged  
19 and beat Rovier in September 2017 and blacklisted him. Debra thanked me for my confirmation.

20 I declare under penalty of perjury under the laws of the State of California, and under the laws of the  
21 United States, that the foregoing it true and accurate.  
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23 Executed this \_\_\_ day of October 2019.  
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27 Alex Vega, declarant.  
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## DECLARATION OF MERCEDES STANLEY

I, Mercedes Stanley, declare:

1. I have personal knowledge of the facts stated below, and if called as a witness, I would and could testify competently to them.
2. I have known Mr. Rovier Carrington since 2010, and I am proud to call him a friend.
3. During our relationship, Mr. Rovier Carrington, who at the time went by the Stage name, “Trend Rovheir”, confided in me that Mr. Brian Graden drugged, raped and recorded him when he was underage after the two met at MTV headquarters in Santa Monica, CA.
4. In June 2010, I was apart of the cast for the reality show "The Life of a Trendsetter", and I went to several meetings with an MTV representative, regarding the production of the show. I departed the show in the fall of 2010 to become a mother – and Mr. Carrington reshot the show with a new cast.
5. Mr. Carrington gained success after posting the Reality Show teaser onto Youtube.com.
6. Mr. Reno Logan of Paramount Pictures contacted Mr. Carrington the same day of the posting and requested they meet immediately at Paramount Pictures.
7. I soon discovered Rovier’s time at Paramount Pictures was not much different than pervious occurrences with other Executives under Viacom. Rovier expressed he had been sexually assaulted by Sumner Redstone, as Sumner locked Rovier in a town car on the Paramount lot and fondled his penis in late 2010. Mr. Brad Grey had also sexually assaulted Rovier on numerous occasions starting in late 2010 through 2011, one assault being inside the Beverly Hills Hilton where Brad forced liquor down Rovier’s throat before raping him in a suite above an after-party, – and lastly Harvey Weinstein, who raped Rovier inside the Peninsula hotel in Beverly Hills in early 2011.
8. When Mr. Carrington revealed this to me, he was extremely upset, crying, and did not know

1 what he should do. He stated he complained to Reno Logan and Shari Redstone, but nothing was  
2 done. Sumner Redstone, Brad Grey and Mr. Logan told him, he would become blacklisted throughout  
3 Viacom, and the entertainment industry, if he didn't start to play-the-game and remain silent.

4 9. In late 2017, I interviewed with Debra Birnbaum of Variety regarding the sexual assaults  
5 committed by Brian Graden against Mr. Carrington. I confirmed to Debra that Brian raped, drugged,  
6 and physically and emotionally abused Rovier over a decade's time. Debra asked me about Brian and  
7 Rovier's working relationship, by which I explained Brian stole "Finding Prince Charming" from  
8 Rovier and tried to buy his silence by producing Mr. Carrington's dark comedy, "Heiristocracy",  
9 however, Brian became enraged and beat Rovier in September 2017 and blacklisted him. Debra  
10 thanked me for my confirmation and said several others have confirmed Brian's misconduct.

11 I declare under penalty of perjury under the laws of the State of California, and under the laws of the  
12 United States, that the foregoing is true and accurate.

13 Executed this \_\_ day of October 2019.

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Mercedes Stanley, declarant.  
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## SUPPLEMENTAL AFFIDAVIT IN SUPPORT OF PETITION

IN THE HIGH COURT OF JUSTICE  
ANTIGUA AND BARBUDA  
CIVIL DIVISION

SUPPLEMENTAL AFFIDAVIT IN SUPPORT OF PETITION  
by ALKI DAVID

I, ALKI DAVID, do hereby make oath and state as follows:

1. I make this affidavit in further support of my Petition currently before this Honourable Court seeking relief for malicious prosecution, abuse of process, and conspiracy.
2. I assert that CBS, FOX, NBC, and ABC do not operate as independent competitors, but rather as co-conspirators under the strategic influence of a transnational power structure known as the "Mega Group." This group includes Shari Redstone (CBS/Paramount), Rupert Murdoch (FOX), Brian Roberts (NBC/Comcast), and their trusted legal operatives such as David Boies, Gloria Allred, Lisa Bloom, and Tom Girardi.
3. These media corporations function as a unified monopolycolluding through shared legal and financial instruments, exclusive cross-licensing arrangements, and coordinated blacklisting of adversaries. My digital broadcasting platform, FilmOn, was the first to legally challenge this structure through the landmark MVPD (Multichannel Video Programming Distributor) license case in U.S. District Court. The ruling recognized FilmOns right to stream public broadcast contentthreatening the outdated, cable-monopoly model that these networks controlled.
4. In direct retaliation, these networks weaponized litigation and influence against me:
  - FOX, through its subsidiary Gracie Films, used unlicensed hologram technology to display Homer Simpson at Comic-Con, prompting my lawsuit.
  - NBC, through Comcasts stake in DoubleVerify, issued false reputational reports on FilmOn, sabotaging ad revenue and syndication contracts.

## SUPPLEMENTAL AFFIDAVIT IN SUPPORT OF PETITION

- CBS launched a campaign to discredit me following the CBSYouSuck.com expos, which unveiled internal fraud and sexual exploitation cover-ups.

- ABC indirectly supported legal proxies who filed false lawsuits to paralyze my operations and suppress my platforms expansion.

5. My companies FilmOn, CinemaNow, Hologram USA, SwissX, and others suffered combined financial losses exceeding \$10 billion USD. This includes prolonged legal retaliation following our historic victory in FilmOn v. DoubleVerify. I was represented in that case by attorney Ryan Baker, who successfully argued our position before both the Supreme Court of California and the Supreme Court of the United States. The resulting decisions have since become landmark case law in the area of digital broadcast defamation and were hailed by scholars as precedent-setting in defending innovation against monopolistic censorship. Notably, Ryan Baker now represents Mrs. Katherine Jackson, mother of the late Michael Jackson. Mrs. Jackson has expressed her full support for me and confirmed that the persecution I face mirrors the coordinated legal and media assault endured by her son. She is prepared to testify to the syndicate's role in both our cases and the common strategies of media exploitation and fraudulent litigation that targeted us.

One of the defining moments in this battle was the FCC's Notice of Proposed Rulemaking (NPRM) led by Chairman Tom Wheeler, which proposed that digital streaming platforms like FilmOn and CinemaNow be classified as Multichannel Video Programming Distributors (MVPDs), thereby granting them the same legal access to content as cable companies. This reform directly threatened the monopolistic control of CBS, FOX, NBC, and ABC.

I worked closely with FCC counsel Rebecca Rini during this regulatory battle. Rebecca Rini was instrumental in helping me secure legal positioning for FilmOn's MVPD status, but tragically, she is now deceased. Her death occurred under suspicious circumstances just as these media networks intensified their coordinated retaliation. Rini's legacy and work are crucial to understanding the structural efforts undertaken to reform the broadcast industry and the violent opposition those reforms provoked from the very networks now co...

due to canceled licensing deals, deplatforming, malicious defamation, and legal obstruction executed by this monopoly cartel and its proxies.

6. David Boies has consistently represented the interests of this syndicate under the guise of legal advocacy.

## SUPPLEMENTAL AFFIDAVIT IN SUPPORT OF PETITION

His firm coordinated multiple attacks on my companies and orchestrated the attempted enforcement of fraudulent U.S. judgments in Antigua. He is further tied to the illegal resurrection of LimeWire 2.0 in Austriaa platform permanently shut down by U.S. court order, which has since been reactivated by CBS-affiliated backers through shell entities.

7. My exposure of these actions through CBSYouSuck.com created a viral digital footprint that attracted massive public support but provoked equally aggressive retaliation by these networks. They initiated lawfare through agents such as Gloria Allred, Lisa Bloom, and Tom Girardi, who coerced false witnesses and staged legal entrapments to discredit me in multiple jurisdictions.

8. Multiple whistleblowersincluding Ciara Menifee and Grant Zimmermanhave submitted declarations attesting to fabricated allegations, perjury, and coercion tied directly to these attorneys and the networks backing them. In addition, members of Michael Jacksons familywho themselves have been targeted by the same syndicatehave publicly and privately expressed their support for my legal battle. Rose McGowan, one of the original faces of the #MeToo movement, has also confirmed her willingness to stand as a witness. Numerous attorneys across California, with firsthand knowledge of the misconduct of Boies, Allred, and Girardi, have come forward and expressed their readiness to testify under oath to the systemic legal abuse carried out by this group.

9. This syndicate constitutes a transnational racketeering cartel operating with total disregard for the sovereignty of states, the dignity of individuals, and the sanctity of justice. It is no longer simply a media empireit is a coordinated apparatus of intimidation, censorship, extortion, and cultural domination. It is, without exaggeration, a scourge on our species.

10. The same group of individuals and institutions who targeted me were previously involved in one of the most infamous legal persecutions in modern entertainment historyagainst Michael Jackson. CBS, Gloria Allred, Tom Girardi, and David Boies were all connected through legal and media coordination with Barry K. Rothman, the original attorney involved in the Jordan Chandler case. Anthony Pellicano, who later targeted me, also played a role in surveillance and manipulation during Jacksons trials.

11. Michael Jackson's family has come forward in support of me and my legal struggle. They recognize the

## SUPPLEMENTAL AFFIDAVIT IN SUPPORT OF PETITION

same actors, media outlets, and attorneys who maliciously dismantled Michael Jackson's career and reputation, and have since turned their coordinated tactics against me. The pattern of abuse, media distortion, and legal entrapment is identical, and the Jackson family has acknowledged that my fight is theirs as well as a shared resistance against the same transnational network that ruins artists, inventors, ...

12. Barry K. Rothman, who served as my attorney in defending me against Gloria Allred's fraudulent and malicious lawsuits many of which were coordinated with CBS following the launch of CBSYouSuck.com was murdered in 2018. Rothman had extensive knowledge of the same legal figures who targeted Michael Jackson and was actively preparing counterclaims against CBS and Allred on my behalf. His death occurred during the escalation of threats I received from Robert Shapiro and Fred Heather, and is part of a ...

13. Similarly, Mark Lieberman, my attorney in the federal lawsuit *Alkiviades David v. Comcast et al.* filed in Dallas, Texas, was also found dead under suspicious circumstances. Lieberman was preparing to reveal internal documentation and witness statements tying Comcast, DoubleVerify, and CBS to coordinated digital censorship and legal sabotage targeting my platforms, including FilmOn and SwissX.

14. The pattern of sudden deaths surrounding my key legal defenders, combined with prior targeted murders of individuals like Jack Palladino and Barry Rothman, demonstrates a clear intent to silence those willing to stand up to the syndicate. These are not isolated events they are part of an organized campaign of legal, reputational, and physical destruction against anyone who resists the Mega Group's control.

15. Daphne Barak, a long-time CBS-affiliated journalist and known associate of Shari Redstone and David Boies, played a dual role in the Petitioners' targeting. Barak previously conducted exclusive interviews with Michael Jackson for CBS during the height of his legal persecution, raising serious questions about her access and her editorial intentions. More recently, she gained exclusive interviews with Ghislaine Maxwell, a convicted conspirator in Jeffrey Epstein's trafficking network. Barak's ...

16. Newly surfaced evidence further proves the orchestrated nature of this conspiracy. Text messages provided by Mary Rizzo, a direct insider to several of the claimants involved in these litigations, clearly indicate that the legal campaign against me was designed not for justice but to sabotage my companies FilmOn, Hologram USA, SwissX, and CinemaNow. These communications explicitly reference a

## SUPPLEMENTAL AFFIDAVIT IN SUPPORT OF PETITION

coordinated plan to "take him out through litigation" and confirm that I was the intended target beca...

17. David Boies transnational destabilization efforts extend beyond the United States. He played a central role in orchestrating the global campaign against the British Royal Family, specifically targeting Prince Andrew through the now-deceased Virginia Giuffre. Giuffre, long presented as a central figure in the Jeffrey Epstein case, had initially faked her suicide before her death was ultimately confirmed under highly suspicious circumstances. Her testimony was weaponized by Boies and his associates ...

18. At the core of this transnational conspiracy lies a central nexus: David Boies, Shari Redstone, and Daphne Barak. Boies, the legal enforcer; Redstone, the media power broker and financial architect; and Barak, the narrative manipulator and intelligence liaison, work in tandem to coordinate takedowns of whistleblowers, competitors, and dissenting voices across borders. This triumvirate represents the operational backbone of the syndicate targeting me and others, linking legal warfare, media m...

19. One of the most revealing pieces of evidence concerning the financial mechanisms behind this syndicate came from the investigative work of John Quirk, a trusted analyst who traced over \$200 million in assets connected to Gloria Allred, was first run over by a vehicle in Turkey under suspicious circumstances and later died after being poisoned while under medical supervision in a hospital. His death, confirmed by multiple witnesses and local reports, fits a consistent pattern of targeted silencing of individuals tied to key financial investigations exposing this syndicate. Quirk through living trusts, shell companies, and opaque holding structures. Quirks investigation, which included data showing fund flows linked to litigation clients and alleged victims, revealed that Gloria Allred employed the same fraudulent structures as Tom Girar...

16. I affirm that these statements are true to the best of my knowledge and belief and respectfully submit them in support of my Petition currently before this Honourable Court.

DATED this \_\_\_ day of June 2025.

---

ALKI DAVID

Petitioner

Fri. Mar 6th, 2026 4:33:07 PM



REAL TALK

NEWS

# Dr. Eric Wexler & The UCLA 5150 DEATH PROTOCOL:



By Alki David

APR 23, 2025

## Santa Monica, Calif: How Wexler, Lieberman, Allred & Pellicano Use Chemical Warfare to Erase Threats to the Mega Group

Filed by SwissX Investigations | Affidavit of Alki David | April 2025 | For Global Prosecution

ARCHIVES

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April 2025

[« Mar](#) [May »](#)





“The information presented in this article regarding Dr. Eric Wexler is drawn directly from my sworn affidavit and my personal experience. It is not based on rumor or speculation. My testimony is further corroborated by members of Michael Jackson’s family, who have independently confirmed that Eric Wexler subjected them to similar forms of abuse and coercion. We are speaking out now to ensure that the truth is known, and that those who have weaponized medicine to harm and control others are held accountable.” **ALKI DAVID**

This is **not medicine**.

This is a **death protocol disguised as mental health care**, executed by **state-licensed terrorists in white coats**. These individuals are responsible for **murder, rape, and psychological genocide**, all hidden behind clipboards, forced injections, and media cover-ups.

## THE FOUR PSYCH-WAR OPERATIVES:

- **Dr. Eric Wexler** – *Predatory psychiatrist, cousin to Epstein’s banker Leslie Wexner*. He prescribed me a **chemical castration regimen** meant to destroy my mind and will.



- **Dr. Carole Lieberman** – *Mossad-linked agent, Lebanese-born, armed with a pistol on her ankle*, signs off on 5150s like they’re parking tickets.
- **Gloria Allred** – *Litigator and public executioner*, responsible for laundering psychiatric fraud through the court system for decades.
- **Anthony Pellicano** – *Convicted wiretapper, sexual blackmailer, Hollywood’s muscle*, stalking victims on behalf of Sony, CBS, and the Mega Group.





## THE CHEMICALS THEY PRESCRIBED TO ME (AND OTHERS)

These are **not treatment drugs**—they are **bioweapons**, used to:

- induce psychosis,
- erase memory,
- impair speech,
- cause sexual dysfunction,
- and ultimately render the victim **institutionalized and dependent**.

### **RISPERIDONE (Risperdal)**

- **Effect:** Causes massive dopamine suppression
- **Side Effects:** Tardive dyskinesia (involuntary facial/body movements), lactation in men, suicidal ideation, permanent cognitive dulling
- **Long-Term Damage:** Brain volume loss, permanent impotence, hormonal collapse
- **Real-World Use:** Given to prisoners to sedate rebellion. Also used in **chemical castration** protocols.



- **Why Wexler Used It:** To *destroy my sexual identity* and neutralize my will to fight.

---

## 2. ZYPREXA (Olanzapine)

- **Effect:** Severe sedation, memory disruption, visual and auditory hallucinations
- **Side Effects:** Permanent brain fog, coma risk at high doses, insulin resistance leading to diabetes
- **Long-Term Damage:** Frontal lobe shrinkage, irreversible metabolic damage, suicidal ideation
- **Real-World Use:** Deployed in psych wards to eliminate “unruly” patients
- **Why Wexler Used It:** To *induce public embarrassment, confusion, and slurred speech*—to make me appear mentally unstable in court or media.

---

## KLONOPIN (Clonazepam)

- **Effect:** High-potency benzodiazepine; shuts down higher brain function
- **Side Effects:** Blackouts, loss of motor coordination, suppressed respiration, extreme dependency
- **Withdrawal Risk:** Fatal seizures, psychosis, violent hallucinations
- **Real-World Use:** Used by intelligence agencies in forced confessions and memory erasure
- **Why Wexler Used It:** To **render me defenseless, helpless, and erase memory of abuse**—*potentially sexual abuse* while under its effects.

---

## THE COCKTAIL’S INTENDED RESULT:

“ *A human being stripped of ego, memory, speech, and sexuality.  
A body kept alive for humiliation.  
A mind erased for the convenience of the syndicate.* ”

This was a **chemical crucifixion**, backed by **Wexner’s billions**, **Lieberman’s Mossad training**, **Allred’s court manipulation**, and **Pellicano’s terror tactics**.

---

## THEY’VE DONE THIS BEFORE:

- **Michael Jackson** – Threatened with 5150 days before death. **Rose McGowan** – Drugged, gaslit, nearly killed.
- **Britney Spears** – Slaved under psychiatric guardianship for 13 years.
- **Blanket Jackson** – Monitored and harassed post-Michael.
- **Alki David (me)** – Jailed 6 days after refusing Wexler’s poison. Dog stolen. Life threatened.

All of us were victims of **this exact chemical matrix**, tailored to erase dissent and enable the Mega Group’s **media, legal, and financial takeover**.



## INTENT TO RAPE:

Wexler's behavior—his proximity, his silence, his smile as he slid that prescription across the table—wasn't just clinical. It was

**predatory.**

## THE KILLER DRUGS

Combine **Klonopin** and **Zyprexa**, and you have a perfect drugging tool for **sexual assault**:

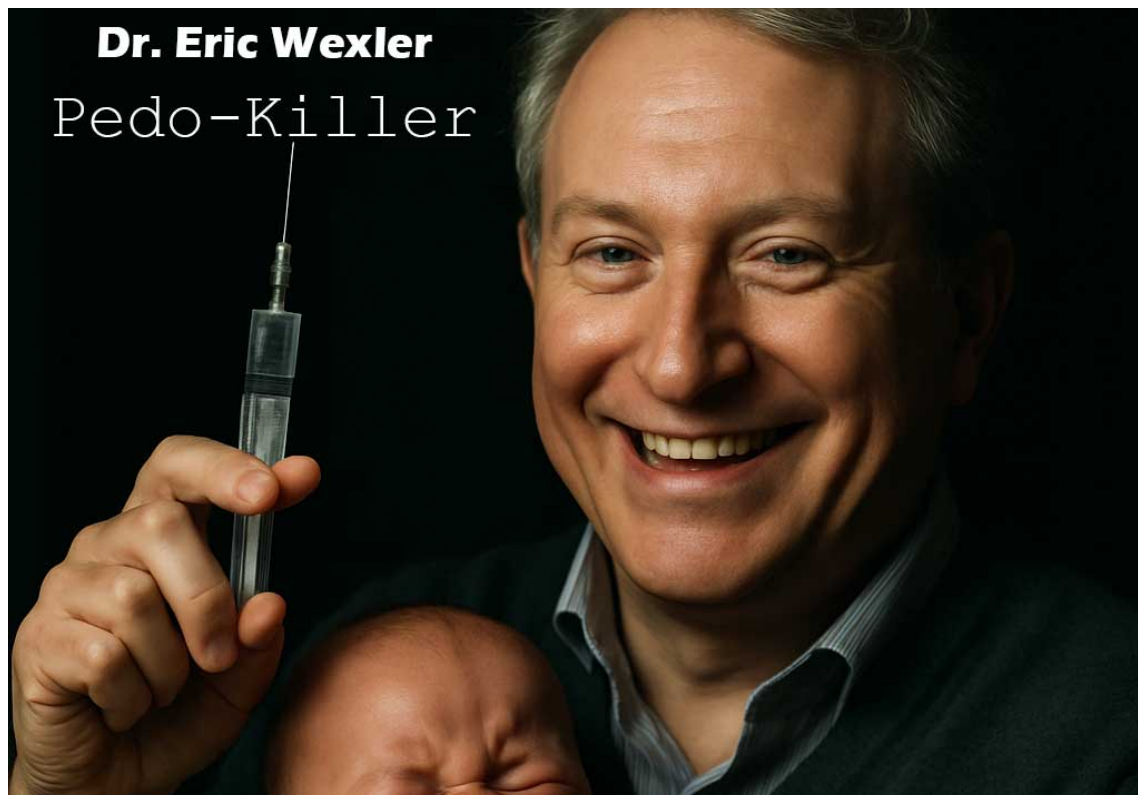
- You won't remember what happened.
- You can't speak clearly.
- You won't be believed.

And that's the point.

## THIS IS AN INTERNATIONAL CRIME SYNDICATE:

This isn't malpractice. This is **organized chemical warfare** used by a **Mossad-licensed kill team**.

- **Wexler and Wexner are blood.**
- **Lieberman is Mossad.**
- **Allred is a legal black widow.**
- **Pellicano is Hollywood's intelligence rat.**





They are targeting **celebrities, whistleblowers, activists, artists**, and anyone who gets close to the truth about:

- **Jeffrey Epstein**
- **Leslie Wexner**
- **Sony and CBS trafficking networks**
- **Michael Jackson's assassination**
- **Hollywood's asset theft and conservatorship machine**

[Edit](#)



[<< Miracle Is Born: A One-in-a-Million Geep Ushers in the SwissX Age of Regeneration](#)
[Austin Petersen: Media Whore for The Mega Group's Child Rape Empire—CBS, Wexner, and the Network of Abuse](#)
[>>](#)



By [Alki David](#)

Alki David — Publisher, Media Architect, SIN Network Creator - live, direct-to-public communication, media infrastructure, accountability journalism, and independent distribution. Born in Lagos, Nigeria; educated in the United Kingdom and Switzerland; attended the Royal College of Art. Early internet broadcaster — participated in real-time public coverage during the 1997 Mars landing era using experimental online transmission from Beverly Hills. Founder of FilmOn, one of the earliest global internet television networks offering live and on-demand broadcasting outside legacy gatekeepers. Publisher of SHOCKYA — reporting since 2010 on systemic corruption inside the entertainment business and its expansion into law, finance, and regulation. Creator of the SIN Network (ShockYA Integrated Network), a federated media and civic-information infrastructure spanning investigative journalism, live TV, documentary, and court-record reporting. Lived and worked for over 40 years inside global media hubs including Malibu, Beverly Hills, London, Hong Kong and Gstaad. Early encounter with Julian Assange during the first Hologram USA operations proved a formative turning point — exposing the realities of lawfare, information suppression, and concentrated media power. Principal complainant and driving force behind what court filings describe as the largest consolidated media–legal accountability action on record, now before the Eastern Caribbean Supreme Court. Relocated to Antigua & Barbuda and entered sustained legal, civic, and informational confrontation over media power,



safeguarding, and accountability at Commonwealth scale.

## One thought on “Dr. Eric Wexler & The UCLA 5150 DEATH PROTOCOL:”

**[Donald Trump sues Murdoch, Wall Street Journal for \\$10 billion over Epstein article – BIG BROTHER in the 21. Century](#)** says:  
[July 19, 2025 at 5:31 am](#)

[Edit](#)

[...] Dr. Carole Lieberman – Mossad-affiliated media psychiatrist who enabled and facilitated psychiatric targeting and defamation campaigns. Worked closely with Gloria Allred and Lisa Bloom to discredit high-profile whistleblowers and sexual abuse victims who resisted the syndicate. Dr. Eric Wexler & The UCLA 5150 DEATH PROTOCOL: [...]

Comments are closed.



REAL TALK

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**Recommended letter**

Ministère public du canton de Genève  
Monsieur  
Olivier JORNOT  
Procureur général  
Case postale 3565  
1211 Genève 3

Gstaad, December 16th 2021

**Concerning : Criminal complaint of Alkiviades DAVID against Lauren REEVES ; American judicial system; information concerning punitive damages; Criminal complaint in original version**

Dear Attorney General,

You know that I represent the interests of Mr Alkiviades DAVID.

This letter is in response to the criminal complaint filed by my principal against Mrs. Lauren REEVES on November 19th, 2021 (hereinafter "the Complaint").

In order to better circumscribe the context of the facts presented in the Complaint, my client wishes to highlight a few particularities inherent in the functioning of the American judicial system.

First of all, it is common in the United States for a party to claim damages, especially punitive damages.

In this context and by way of introduction, it appears that the American lawyers of Mrs. Lauren REEVES are specialised in building up cases with a view to obtaining damages in favour of their clientele, in particular in civil, labour law and sexual harassment cases (cf. **all. n° 29 and 30 of the Complaint**) (cf. **exhibits n° 10 to 12 of the Complaint**).

Indeed, according to the GLOBAL ARBITRATION REVIEW (cf. **article n° 1, page no. 4**), punitive damages - prohibited by Swiss public policy - are widely available and may be awarded in commercial and contractual cases (« *Under US law, punitive damages are widely available and may be awarded in commercial and contractual cases.* »).

It is noted in this respect that, as illustrated in the Complaint (cf. **incl. all. n° 31 to 42 of the Complaint**), it is not a judge who decides on the award of compensation, including punitive damages, but a popular jury. In other words, the judge does not decide on the law, so that the award of

punitive damages, which frequently reach unreasonable sums as will be shown below, depends solely on the permeability of the jury, which is made up of citizens chosen by lot, i.e. without any legal training whatsoever, and which can be easily manipulated, particularly by an attorney who is well versed in oratory.

The Supreme Court has repeatedly struck down excessive punitive damages awards as arbitrary deprivations of property without due process of law (cf. **article n° 2, page n° 1, article published in FORBES on 8 April 2021**).

The problems with the US Supreme Court's requirement of due process in lower courts, including their lack of fairness and consistency, have increased in recent years. Indeed, lower courts have been reluctant to comply with the US Supreme Court's jurisprudence on punitive damages, as they have continued to award excessive punitive damages (*« ... Since then, the due process defects identified by the Court - such as lack of fairness, a lack of consistency, and cumulative punishment - have only increased in severity. These changes are fueled by an increase in the size of mass tort actions, coupled with many courts' reluctance to rein in constitutionally excessive punitive damages awards. Indeed, many circuit and state courts have all but ignored the Court's admonition that, when the compensatory damages award is "substantial", the punitive damages award should be no greater »*) (cf. **article n° 2, page n° 2**).

From the above, it is clear that punitive damages are relatively easy to obtain in the United States. There is a twofold aspect to this : the ease with which the American legal system makes it possible to obtain damages, especially punitive damages, has the perverse effect of encouraging individuals to take legal action, or even to construct a legal action from scratch, thanks in particular to the help of law firms that specialise in obtaining damages for their clients.

With regard to the collaboration of several attorneys in the establishment of this pernicious judicial system, we note that contrary to the regime prevailing in Switzerland (art. 12 let. e LLCA), the *pactum de quota litis* is authorised in the United States, so that it is perfectly possible, as it is often the case, for an attorney to agree not to receive a retainer or fees but to be remunerated solely on the basis of the outcome of the proceedings, receiving a percentage which in principle varies between 30 and 40% in the event of success (cf. **article n° 3, page n° 2**), which is obviously also an incentive for attorneys, who, so to speak, "participate in this system".

The above argument is all the more true with regard to the State of California, i.e. the State in which the American judgment was rendered and on which Mrs Lauren REEVES based her application for sequestration dated 14 October 2021 (cf. **exhibits n° 8 and n° 9 of the Complaint**).

In addition to excessive punitive damages awards being an issue in California, according to MG+M (cf. **article n° 4, page n° 3**) (*« In addition to excessive punitive damages awards being an issue in California, ... »*). Moreover, a continuing issue across the country is multiple lawsuits seeking punitive damages for the same tortious conduct (*« ..., a continuing issue across the country is multiple lawsuits seeking punitive damages for the same tortious conduct. »,*), which demonstrates that there is an unhealthy, and legally dubious, tendency to chase punitive damages in the United States.

MG + M (cf. article n° 4, page no. 1) also notes that punitive damages have a punitive function for the conduct of the perpetrator on the one hand and a deterrent function for the perpetrator in the future on the other. Nevertheless, the award of punitive damages sometimes exceeds these two objectives and constitutes a violation of the 14th Amendment of the US Constitution and its Fair Trial Clause which prohibits grossly excessive or arbitrary punishment (« *Punitive damages are meant to serve two purposes: punish the defendant for the conduct at issue in the lawsuit and deter similar conduct in the future. But, sometimes a punitive damages award goes beyond serving these two purposes and moves into the territory of violating the Due Process Clause of 14th Amendment to the United States Constitution. The 14th Amendment, through the Due Process Clause, prohibits the imposition of grossly excessive or arbitrary punishments* »).

In addition, and still with regard to the State of California, it has legislated on the subject of punitive damages by requiring clear and convincing evidence without, however, specifying the notion (« *Punitive damages are allowed in California ... which states "In an action for the breach of an obligation .... is proven by clear and convincing evidence ... " ... Although California does not define "clear and convincing evidence" ...* ») (cf. article n° 4 , page n° 1), which, along with the other factors mentioned above, contributes to the numerous abuses observed in this State in the award of such punitive damages.

In view of the above, the American judicial system, and especially California's, is a gigantic theatre where individuals can be awarded absolutely unreasonable compensation by a popular jury in proceedings where legal and judicial requirements, particularly those relating to a fair trial, are sometimes sacrificed on the altar of the plaintiffs' greed.

We note that the #MeToo movement is unfortunately not helping this trend. Indeed, while it is true that this movement allows victims to speak out and to shed light on acts of harassment that have actually been committed, which is a happy outcome, we must also acknowledge that it is unfortunately a source of inspiration, a springboard, for some unscrupulous women to falsely claim to be victims of harassment in order to obtain a sum that will exempt them from working for the rest of their lives.

In this context, it must be said that the media coverage that some of them receive, by attacking well-known personalities, only serves to unduly strengthen their claims, through public opinion which is almost always sympathetic to their cause without having had any access to the elements of the case, in particular to possible evidence.

Finally, the original version of the criminal complaint, signed by my client, is attached.

Thanking you in advance for the action you will take on this matter, I would like to assure you, Mr Prosecutor General, of my respectful consideration.

Exct Béatrice STAHEL

Arthur SEPPEY

*Attached : ment.*



Alkiviades David <filmonpersonal@gmail.com>

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## LAW ENFORCEMENT ALERT — URGENT CRIMINAL INVESTIGATION REQUIRED

### Dallas Police Department Homicide Unit / Crimes Against Persons Division

---

Alki David <filmonpersonal@gmail.com>

Sun, Mar 29, 2026 at 2:52 PM

Reply-To: alki@filmon.com

To: Homicide@dpd.dallascityhall.com, Criminal Investigation Department <cidpd@ab.gov.ag>, "Rika A. Bird - Rika Bird & Associates" <rikabirdassociates@gmail.com>, James Bohm <jbohm@aol.com>, Ceci Preciado <cpreciado@bohmwildish.com>, Angelina Dettamanti <adettamanti61717@gmail.com>, Cynthia Lopez <clopez@bohmwildish.com>

Bcc: EP <eightpence@protonmail.com>

## LAW ENFORCEMENT ALERT — URGENT INVESTIGATIVE ACTION REQUESTED

### Dallas Police Department — Homicide Unit / Crimes Against Persons Division

**From:** Alkiviades David

**Date:** 29 March 2026

**Location:** SwissX Island, St. John's, Antigua and Barbuda

**RE:** Request for Coordinated Investigation — Suspicious Deaths, Witness Risk, and Potential Evidence Interference (Dallas Nexus)

---

## 1. PURPOSE OF THIS ALERT

This is a formal request for review and coordination with the Dallas Police Department Homicide Unit regarding:

- The death of attorney Mark J. Lieberman;
- The death of Aaron "Cain" McKnight in Dallas;
- Potential overlap with witness activity, litigation exposure, and evidence integrity concerns across multiple jurisdictions.

This alert is submitted on the basis of **reasonable grounds requiring investigative verification**, not as a determination of causation.

---

## 2. CORE FACTUAL CONTEXT

- Mark J. Lieberman filed a federal RICO action in the Northern District of Texas (Dallas Division) on or about 13 January 2023.
- Shortly thereafter, communications directed to him (as documented in federal filings) were interpreted by him as threatening in nature.
- Lieberman subsequently died under circumstances that, in context, warrant review alongside his litigation activity.
- Aaron "Cain" McKnight died in Dallas in early March 2026 under circumstances publicly described as suspicious.
- McKnight had recently been identified in connection with ongoing litigation and witness-related activity.

These two events, while not asserted as causally linked, present a **temporal and contextual overlap requiring examination**.

---

## 3. SUPPORTING INVESTIGATIVE TRIGGERS

The following elements support the need for review:

- Documented litigation activity involving high-value and high-profile disputes;
  - Evidence of potential witness instability or absence in related proceedings;
  - Reports of missing or unrepresented evidential material in parallel cases;
  - Direct communications involving Anthony Pellicano relating to a reported Malibu incident, including CCTV imagery and contemporaneous reporting;
  - Multi-jurisdictional litigation involving overlapping parties and legal exposure.
- 

#### 4. WITNESS AND CONTEXTUAL ELEMENTS

The undersigned further reports that:

- Sean Combs is alleged to have relevant connections to matters involving individuals and events referenced in ongoing proceedings;
- Daniel Kapon Jr. and his mother are identified as reported beneficiaries of the Michael Jackson estate and as potential victims and witnesses with direct knowledge of overlapping events.

These matters are presented strictly as:

**investigative leads requiring verification**, including review of communications, travel records, witness statements, and associated materials.

---

#### 5. RISK FACTORS

There is a credible risk of:

- Loss or degradation of evidence (devices, communications, CCTV);
  - Incomplete or fragmented evidential records across jurisdictions;
  - Witness vulnerability or reluctance affecting evidentiary clarity.
- 

#### 6. ACTIONS REQUESTED

It is respectfully requested that the Dallas Police Department:

1. Review existing case files relating to:
  - Mark J. Lieberman
  - Aaron "Cain" McKnight
2. Assess whether:
  - Any overlap exists in communications, contacts, or timelines;
  - Either individual had connections to ongoing litigation or witness roles.
3. Issue or confirm preservation of:
  - Digital communications
  - Devices and storage media
  - CCTV and location data
4. Conduct or confirm:
  - Interviews of relevant contacts and associates;

- Forensic review of available electronic evidence.

5. Coordinate, where appropriate, with:

- Federal authorities;
  - The Royal Police Force of Antigua and Barbuda (CID);
  - Other jurisdictions where overlapping proceedings are active.
- 

## 7. EVIDENCE AND COOPERATION

A supporting evidentiary bundle is available and can be provided immediately, including:

- Timelines
- Communications
- Litigation references
- Supporting materials relevant to the above matters

The undersigned is available to:

- Provide a sworn statement
  - Participate in interviews
  - Assist investigators fully
- 

## 8. FINAL NOTE

This alert is submitted in good faith and in recognition that:

**individually explainable events may, when viewed collectively, warrant coordinated investigative review**

No conclusion is asserted beyond the need for verification.

---

**Respectfully submitted,**

/s/  
Alkiviades David  
SwissX Island  
St. John's, Antigua and Barbuda  
[Contact Details]

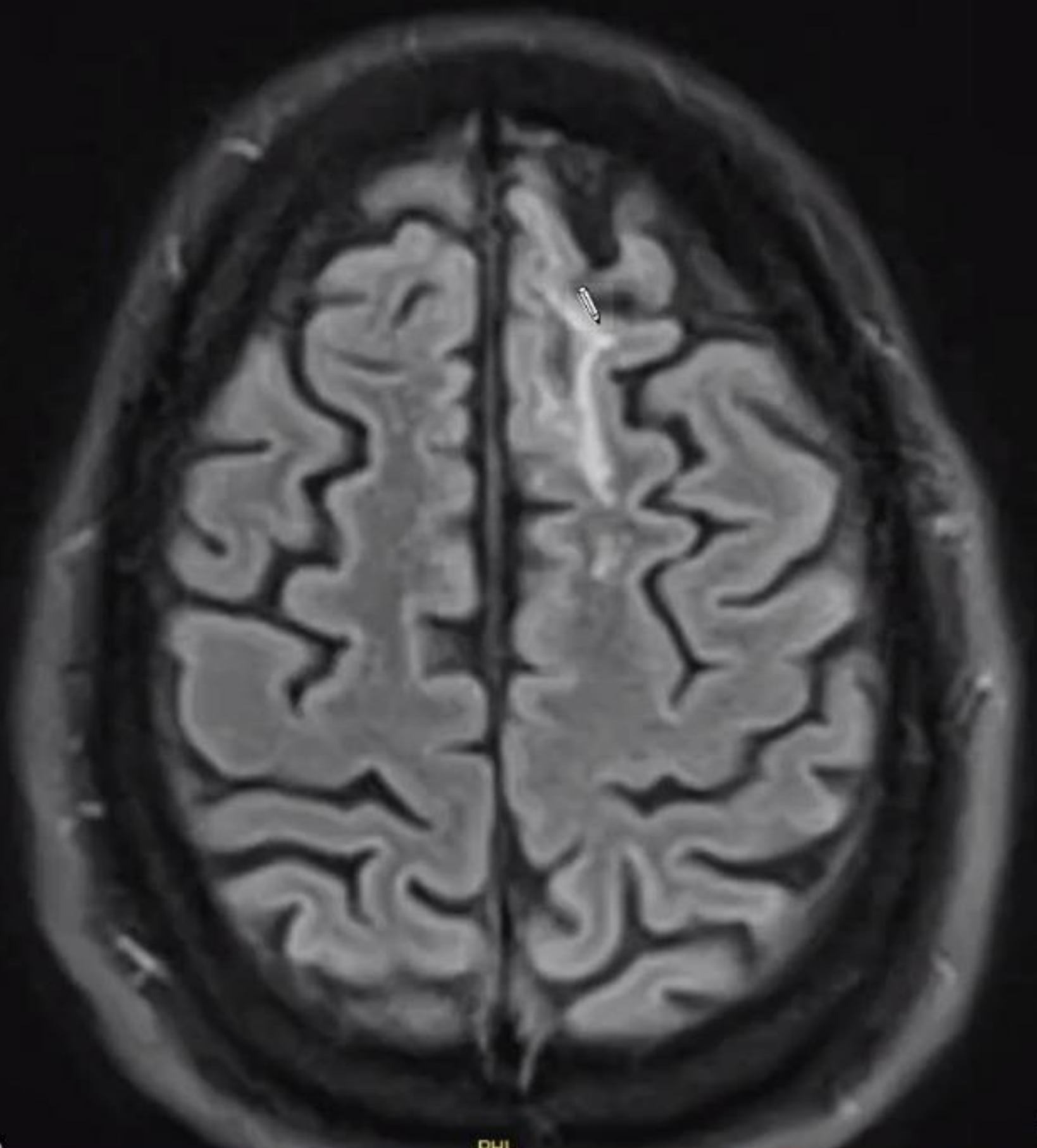


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AFR

Medical Imaging of Southern Calif.  
 Primary  
 MRI Brain wo contrast  
 TR: 8000.0  
 TE: 102.0  
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 FA: 150.0  
 NEX: 1.0



RPF

LAH

Zoom: 4.7  
 BP: 63.8  
 ST: 3.5  
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DAVID, ALKIVIADES  
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| Intracranial Volume (ICV) (cm <sup>3</sup> ) | ICV Percentile |       |       |
|--|----------------|-------|-------|
| 1789.28                                      | 83             |       |       |
| Total Volumes                                | Percentiles    |       |       |
|  | Left           | Right | Total |
| Cerebral White Matter                        | 98             | 96    | 97    |
| Cortical Gray Matter                         | 14             | 4     | 7     |
| Ventricles                                   | 44             | 71    | 58    |
| Subcortical Structures                       |                |       |       |
| Cerebellar White Matter                      | 92             | 96    | 94    |
| Cerebellar Gray Matter                       | 1              | 3     | 2     |
| Brainstem                                    | -              | -     | 1     |
| Thalamus                                     | 29             | 45    | 37    |
| Ventral Diencephalon                         | 3              | 6     | 4     |
| Basal Ganglia                                |                |       |       |
| Putamen                                      | 97             | 91    | 94    |
| Caudate                                      | 87             | 61    | 78    |
| Nucleus Accumbens                            | 98             | 55    | 90    |
| Pallidum                                     | 19             | 6     | 10    |
| Cingulate                                    | 72             | 66    | 70    |
| Anterior Cingulate                           | 96             | 85    | 93    |
| Posterior Cingulate                          | 42             | 69    | 56    |
| Isthmus Cingulate                            | 30             | 13    | 20    |

| Cortical Brain Regions                  | Left          | Right | Total |
|---|---------------|-------|-------|
|   | Frontal Lobes | 44    | 24    |
| Superior Frontal                        | 90            | 7     | 42    |
| Middle Frontal                          | 21            | 87    | 59    |
| Inferior Frontal                        | 11            | 17    | 11    |
| Lateral Orbitofrontal                   | 51            | 31    | 41    |
| Medial Orbitofrontal                    | 12            | 15    | 12    |
| Paracentral                             | 70            | 81    | 76    |
| Primary Motor                           | 57            | 54    | 56    |
| Parietal Lobes                          | 27            | 10    | 17    |
| Primary Sensory                         | 8             | 20    | 11    |
| Medial Parietal                         | 80            | 15    | 53    |
| Superior Parietal                       | 23            | 5     | 9     |
| Inferior Parietal                       | 69            | 34    | 50    |
| Supramarginal                           | 15            | 49    | 25    |
| Occipital Lobes                         | 8             | 10    | 7     |
| Medial Occipital                        | 75            | 51    | 64    |
| Lateral Occipital                       | 1             | 4     | 1     |
| Temporal Lobes                          | 4             | 1     | 1     |
| Transverse Temporal + Superior Temporal | 3             | 1     | 1     |
| Posterior Superior Temporal Sulcus      | 66            | 51    | 58    |
| Middle Temporal                         | 7             | 1     | 1     |
| Inferior Temporal                       | 5             | 1     | 1     |
| Fusiform                                | 59            | 1     | 11    |
| Parahippocampal                         | 56            | 72    | 66    |
| Entorhinal Cortex                       | 28            | 94    | 73    |
| Temporal Pole                           | 1             | 15    | 2     |
| Amygdala                                | 78            | 15    | 46    |
| Hippocampus                             | 74            | 85    | 81    |

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 04:52:39 PM

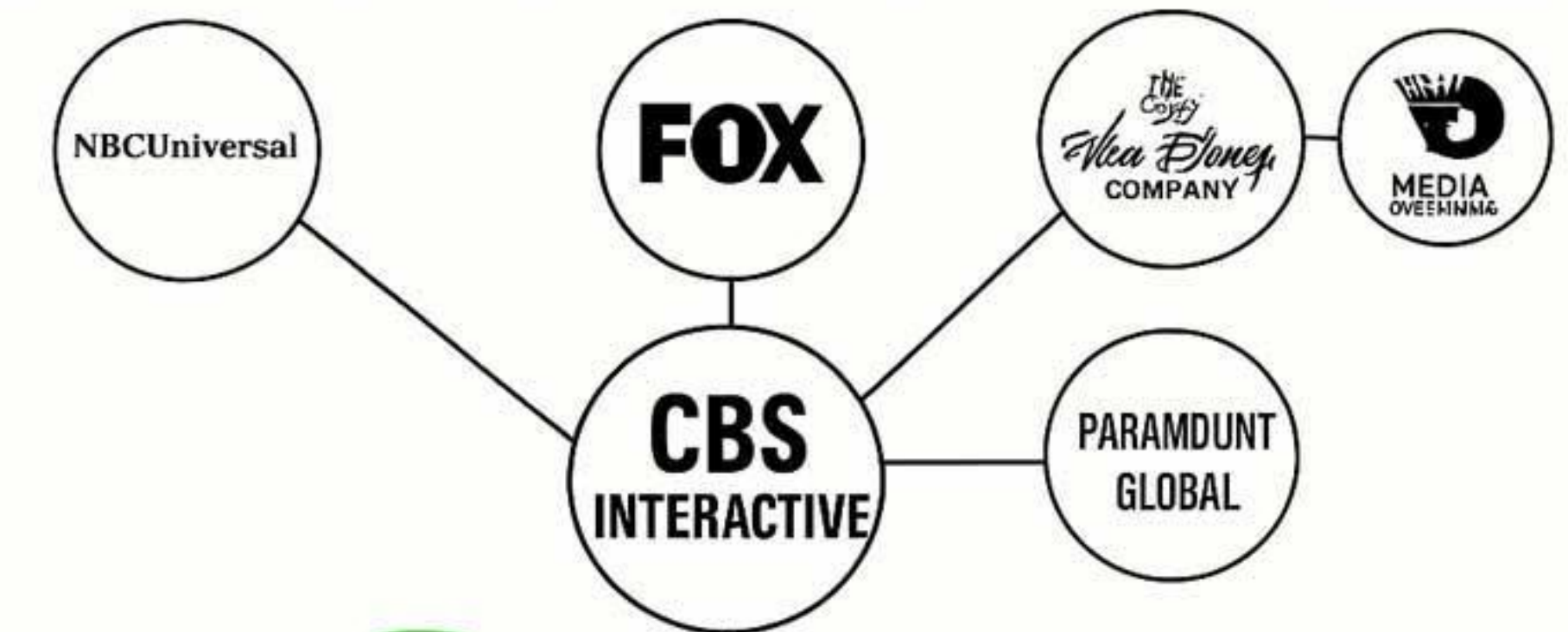


# LIMEWIRE 2.0

IT'S BACK – BEWARE – WARNING KIDS –  
DESPITE FEDERAL COURT BANNING IT

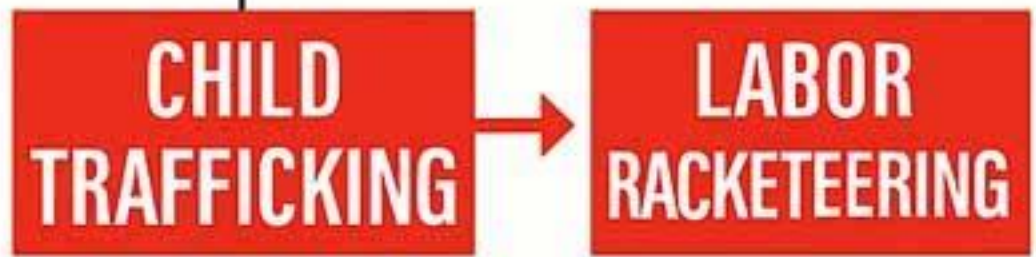
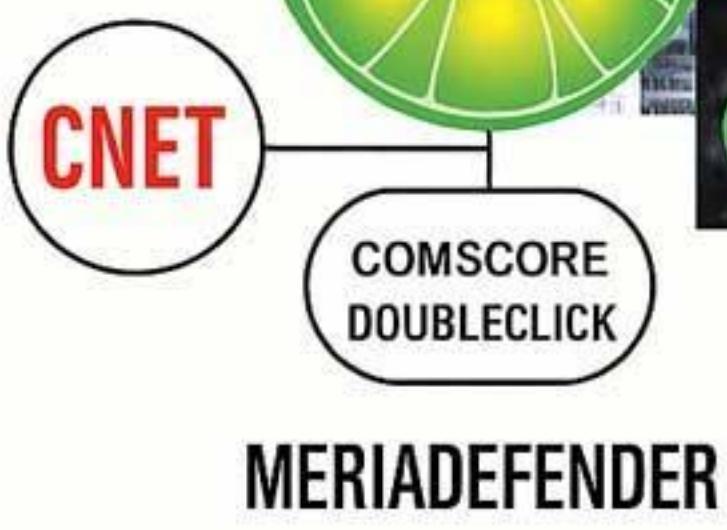


BOB IGER – BRIAN ROBERTS – RUPERT MURDOCH – SHARI REDSTON



**LimeWire**  
ABUSED KIDS *Drehentolce*  
67,200 VIDEOS

RUEx  
Dine Wire



8 MILLION MISSING KIDS A YEAR – MEDIA  
BLACKOUT

# ANTIGUA'S TRAITOR - THE EVIDENCE



UNITED STATES COURT OF APPEALS  
SECOND CIRCUIT





**Case Number :ANUHCV2025/0149**

**IN THE HIGH COURT OF JUSTICE**

**ANTIGUA AND BARBUDA**

**Claim No: [To be assigned by Registry]**

**BETWEEN:**

**ALKIVIADES DAVID**

*of SwissX Island, St. John's, Antigua & Barbuda*

**Claimant**

— AND —

1. **DAVID BOIES**, of Boies Schiller Flexner LLP
2. **GLORIA ALLRED**, of Allred, Maroko & Goldberg
3. **DANI PERETZ**, of Geneva, Switzerland & Tel Aviv, Israel
4. **SHARI REDSTONE**, of Paramount Global, and Caribbean Holdings
5. **DAPHNE BARAK**, of Beverly Hills, California and Tel Aviv, Israel
6. **MICHAEL AVENATTI**, formerly of Eagan Avenatti LLP
7. **TOM GIRARDI**, incarcerated at Federal Medical Center, Butner, North Carolina, USA
8. **BLACK CUBE LTD**, an Israeli-owned private intelligence agency based in London and Tel Aviv, Israel
9. **LIMEWIRE NFT HOLDINGS**, with assets and servers in the Caribbean
10. **EDGAR BRONFMAN SR. (Deceased)**, estate with real property in St. Barthélemy
11. **JOHN BRANCA**, of West Hollywood and Jumby Bay, Antigua
12. **JOHN MCCLAIN**, music executive, of Los Angeles and Bahamas
13. **THE EXECUTIVE MEMBERS OF THE UNITED PROGRESSIVE PARTY (UPP)**,  
Antigua & Barbuda
14. **And DOES 1-100**

**Defendants**

STATEMENT OF CLAIM



**Submitted Date:17/04/2025 13:21**

**Filed Date:17/04/2025 13:21**

**Fees Paid:52.00**

outside of Antigua and Barbuda.

2. The allegations contained in the claim disclose a reasonable cause of action in accordance with the laws of Antigua and Barbuda against the Defendants.

**IT IS HEREBY ORDERED THAT:**

1. The Claimant and the Honourable Attorney General (as amicus) shall by 15<sup>th</sup> December 2025 file submissions on whether:
  - A. The court has jurisdiction in the circumstances where none of the defendants appear to reside within the jurisdiction and most of the allegations in the claim appear to relate to acts occurring outside of Antigua and Barbuda.
  - B. The allegations contained in the claim disclose any reasonable causes of action in accordance with the laws of Antigua and Barbuda against the Defendants.
2. The Claimant is barred from filing any other documents in this matter except for the written submissions required by this order, and the Court Office shall refuse to accept the filing of any other documents by the Claimant without leave of this court.
3. The matter is adjourned to 16<sup>th</sup> January 2026 for further hearing.
4. The shall have carriage of this order.

BY THE COURT  
REGISTRAR

Rene Williams  
Approved  
7.11.2025

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**CELEB HOLOGRAM CREATOR \$900 MILLION VERDICT LANDMARK SEX ASSAULT CASE**



**WHITNEY HOUSTON ESTATE SAYS HOLOGRAM'S IN VIOLATION ... JUDGE ALREADY BLOCKED IT**



**WHITNEY HOUSTON WOULD-BE 'VOICE' HOLOGRAM SURFACES NO APPROVAL FROM ESTATE**



**CELEB HOLOGRAM CREATOR SUED OFFICE WAS A FRAT HOUSE!! HE GROPED US, EXPOSED US, THEN FIRED US**



**CELEB HOLOGRAM CREATOR SUED EX-WORKER SAYS HE SHOWED US HIS HOMEMADE PORN**



**MICHAEL JACKSON HOLOGRAM TRIGGERS GUN, HITLER THREATS**



**MICHAEL JACKSON HOLOGRAM LAWSUIT THREATENS BILLBOARD MUSIC AWARDS PERFORMANCE**



**MICHAEL JACKSON MJ'S DENTAL MOLD NO DNA!**



**MICHAEL JACKSON DNA TEST ORGANIZER INSISTS RESULTS ARE REAL WE DOCTORED LOGO TO MAKE IT 'PRETTY'**



**MJ'S ALLEGED SON DNA TEST RESULTS ARE BOGUS RIPPED FROM 'TERMINATOR'**



**MJ'S ALLEGED SON POSITIVE DNA MATCH OR SO THEY SAY**



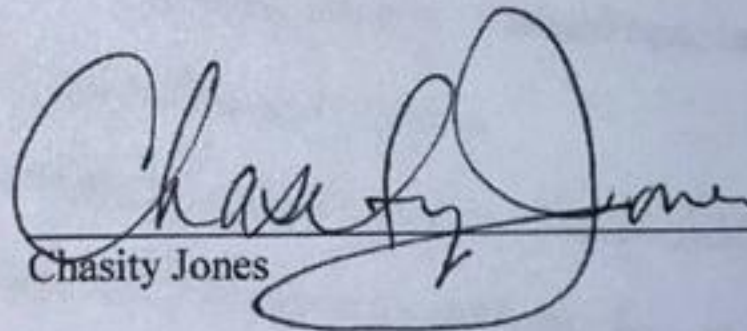
**GEORGE ZIMMERMAN BOXING TRAYVON'S FAMILY REFUSES DONATION FIGHT IS OFF AGAIN**



4. After Elizabeth B. Taylor was terminated in June 2015, Ms. Taylor contacted me on multiple occasions via text messaging. Ms. Taylor asked me to testify that I had witnessed Alki David sexually harass Ms. Taylor "to make her case bigger." I have never been sexually harassed by Mr. David. I once again told Ms. Taylor that I would not testify or be a part of her case. I finally asked her to stop contacting me, which she did.

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

Executed in Beverly Hills, California, on February 16, 2016.

  
Chasity Jones



LIVE

HLN

DrDREW

KATO KAELIN: DID OJ DO IT?

Call now: 1-855-DRDREW5

KATO KAELIN: DID OJ DO IT?

HLN

## Lawyers Market Big #MeToo Verdicts, but Their Clients Struggle to Collect

Gloria Allred, Lisa Bloom and others tout victories against Alki David, but getting him to pay has been an ordeal for clients

 Aa |  Listen (2 min) 



