

1 **UNITED STATES DISTRICT COURT**
2 **FOR THE NORTHERN DISTRICT OF TEXAS**
3 **DALLAS DIVISION**

4 ALKIVIADES DAVID; FILMON TV LTD.;
5 FILMON TV INC.; ALKI DAVID
6 PRODUCTION INC.; HOLOGRAM USA;
7 SWISSX.

8 *Plaintiff(s)*

CASE NO.

9 -v-

10 THOMAS GIRARDI, ESQ; GLORIA
11 ALLRED, ESQ.; LISA BLOOM; ESQ.;
12 NATHAN GOLDBERG, ESQ.; RENEE
13 MOCHKATEL ESQ.; DOLORES Y. LEAL
14 ESQ.; LEAH WILSON; GAVIN NEWSOM;
15 JOSEPH CHORA; ALLRED, MAROKO &
16 GOLDBERG; THE STATE BAR OF
17 CALIFORNIA; ELIZABETH TAYLOR
18 MAHIM KHAN; CHASITY JONES; LAUREN
19 REEVES; COMCAST INC.; COMCAST
20 VENTURES, LLC;.

21 *Defendant(s)*

22 STATE OF CALIFORNIA)
23) ss.
24 COUNTY OF LOS ANGELES)

25 AFFIDAVIT OF RONALD GOTTSCHALK

26 The herein Affidavit is presented pursuant to Rule 65(b)(1)(A) F.R.Civ.P. –

27 I, Ronald Gottschalk, being your affiant and first duly sworn, attest that I have read and
28 understand the content and statements presented within this sworn affidavit. Further, I attest that I
am of sound mind and body, and that the herein statements were made absent of force, threat or

1 coercion. I attest that in or about the year 1998, I was employed as an attorney by Thomas Girardi
2 “Tom” and his Los Angeles law firm. I worked with Tom for a period of 10 years. I was given the
3 nick name of “Mr. Do Good” for reason that I refused to engage in questionable practices while
4 performing as a lawyer. I was with Tom when he decided that he was going to branch off and when
5 Tom brought in Adam Schiff and another attorney by the name of Michael Avenatti. Mr. Avenatti
6 and I were supposed to be partners in Tom’s Orange County, California office. When I interviewed
7 Mr. Avenatti for the employment position I quickly determined that Michael Avenatti was a
8 fraudster. Over the course of time my suspicious about Mr. Avenatti were correct because he lost
9 his license to practice law and is presently serving multiple years in federal prison for fraud related
10 convictions. However, believe that Mr. Avenatti will truthfully testify in regards to his knowledge
11 of the criminal association and activities of Tom Girardi, Gloria Allred, and Lisa Bloom. Tom
12 Girardi, Gloria Allred, and Lisa Bloom are all individuals that I know very well. I attest that Tom
13 Girardi, Gloria Allred, and Lisa Bloom, operate together and are all part of the same syndicate.
14 The Girardi, Gloria Allred, Lisa Bloom syndicate. All of these lawsuits that were being filed by
15 Gloria Allred and her daughter Lisa Bloom, the judges of which were handpicked picked to be a
16 “Girardi judge.” If the cases landed in the court of someone who was *not* a Girardi judge, they
17 would file a motion to be sent to another court that *was* presided over by a Girardi judge. I attest
18 that Tom Girardi was the one paying the judges off, while Gloria Allred and Lisa Bloom were the
19 ones getting in the clients for the purpose of fraudulent litigations.

20 Further, affiant sayeth not:

21 Pursuant to 28 U.S.C. § 1746(1) I declare under penalty of perjury, and under the laws of
22 the United States of America that the above statements are true and correct.

23 Executed this 12th day of January in the year 2023.

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25
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RONALD GOTTSCHALK