

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): <b>Solomon E. Gresen, Esq.</b> SBN: 164783 <b>RG LAWYERS, LLP</b> <b>16200 Ventura Blvd., Suite 216</b> <b>ENCINO CA 92436</b> TELEPHONE NO: 818 815-2727 FAX NO. (Optional): E-MAIL ADDRESS (Optional): <b>SEG@RGLAWYERS.COM</b> ATTORNEY FOR (Name): <b>Plaintiffs, Leonard Whiting and Olivia Hussey</b>	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF <b>Los Angeles</b> STREET ADDRESS: <b>1725 MAIN ST.</b> MAILING ADDRESS: <b>SANTA MONICA 90401</b> CITY AND ZIP CODE: <b>SANTA MONICA 90401</b> BRANCH NAME: <b>WEST DISTRICT</b>	
PLAINTIFF: <b>LEONARD WHITING AND OLIVIA HUSSEY</b>  DEFENDANT: <b>PARAMOUNT PICTURES CORPORATION A DELAWARE CORP</b> <input checked="" type="checkbox"/> DOES 1 TO <u>100</u>	
<b>COMPLAINT—Personal Injury, Property Damage, Wrongful Death</b> <input type="checkbox"/> AMENDED (Number): Type (check all that apply): <input type="checkbox"/> MOTOR VEHICLE <input checked="" type="checkbox"/> OTHER (specify): <b>Fraud</b> <input type="checkbox"/> Property Damage <input type="checkbox"/> Wrongful Death <input type="checkbox"/> Personal Injury <input checked="" type="checkbox"/> Other Damages (specify): <b>CIV § 3344, etc.</b>	
<b>Jurisdiction (check all that apply):</b> <input type="checkbox"/> ACTION IS A LIMITED CIVIL CASE Amount demanded <input type="checkbox"/> does not exceed \$10,000 <input type="checkbox"/> exceeds \$10,000, but does not exceed \$25,000 <input checked="" type="checkbox"/> ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000) <input type="checkbox"/> ACTION IS RECLASSIFIED by this amended complaint <input type="checkbox"/> from limited to unlimited <input type="checkbox"/> from unlimited to limited	CASE NUMBER:

1. Plaintiff (name or names): **Leonard Whiting and Olivia Hussey**  
 alleges causes of action against defendant (name or names):  
**Paramount Pictures Corporation**
2. This pleading, including attachments and exhibits, consists of the following number of pages:
3. Each plaintiff named above is a competent adult
  - a.  except plaintiff (name):
    - (1)  a corporation qualified to do business in California
    - (2)  an unincorporated entity (describe):
    - (3)  a public entity (describe):
    - (4)  a minor  an adult
      - (a)  for whom a guardian or conservator of the estate or a guardian ad litem has been appointed
      - (b)  other (specify):
    - (5)  other (specify):
  - b.  except plaintiff (name):
    - (1)  a corporation qualified to do business in California
    - (2)  an unincorporated entity (describe):
    - (3)  a public entity (describe):
    - (4)  a minor  an adult
      - (a)  for whom a guardian or conservator of the estate or a guardian ad litem has been appointed
      - (b)  other (specify):
    - (5)  other (specify):

Information about additional plaintiffs who are not competent adults is shown in Attachment 3.

SHORT TITLE: Leonard Whiting, et al. v. Paramount Pictures Corp, et al.	CASE NUMBER:
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4.  Plaintiff (name):  
 is doing business under the fictitious name (specify):

and has complied with the fictitious business name laws.

5. Each defendant named above is a natural person

a.  except defendant (name): Paramount  
 (1)  a business organization, form unknown  
 (2)  a corporation  
 (3)  an unincorporated entity (describe):

(4)  a public entity (describe):

(5)  other (specify):

PARAMOUNT PICTURES CORP.  
 A DELAWARE CORPORATION

c.  except defendant (name):  
 (1)  a business organization, form unknown  
 (2)  a corporation  
 (3)  an unincorporated entity (describe):

(4)  a public entity (describe):

(5)  other (specify):

b.  except defendant (name):  
 (1)  a business organization, form unknown  
 (2)  a corporation  
 (3)  an unincorporated entity (describe):

(4)  a public entity (describe):

(5)  other (specify):

d.  except defendant (name):  
 (1)  a business organization, form unknown  
 (2)  a corporation  
 (3)  an unincorporated entity (describe):

(4)  a public entity (describe):

(5)  other (specify):

Information about additional defendants who are not natural persons is contained in Attachment 5.

6. The true names of defendants sued as Does are unknown to plaintiff.

a.  Doe defendants (specify Doe numbers): 1-50 were the agents or employees of other named defendants and acted within the scope of that agency or employment.

b.  Doe defendants (specify Doe numbers): 51-100 are persons whose capacities are unknown to plaintiff.

7.  Defendants who are joined under Code of Civil Procedure section 382 are (names):

8. This court is the proper court because

a.  at least one defendant now resides in its jurisdictional area.

b.  the principal place of business of a defendant corporation or unincorporated association is in its jurisdictional area.

c.  injury to person or damage to personal property occurred in its jurisdictional area.

d.  other (specify):

9.  Plaintiff is required to comply with a claims statute, and

a.  has complied with applicable claims statutes, or

b.  is excused from complying because (specify):

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10. The following causes of action are attached and the statements above apply to each (*each complaint must have one or more causes of action attached*):
- a.  Motor Vehicle
  - b.  General Negligence
  - c.  Intentional Tort
  - d.  Products Liability
  - e.  Premises Liability
  - f.  Other (*specify*):
    - 1) Sexual Harassment; 2) Fraud; 3) Sexual Abuse; 4) Appropriation of Name and Likeness
    - 5) Intentional Infliction of Emotional Distress; 6) Negligence; 7) Unfair Business Practices 17200

11. Plaintiff has suffered
- a.  wage loss
  - b.  loss of use of property
  - c.  hospital and medical expenses
  - d.  general damage
  - e.  property damage
  - f.  loss of earning capacity
  - g.  other damage (*specify*):  
 Economic and Noneconomic

12.  The damages claimed for wrongful death and the relationships of plaintiff to the deceased are
- a.  listed in Attachment 12.
  - b.  as follows:

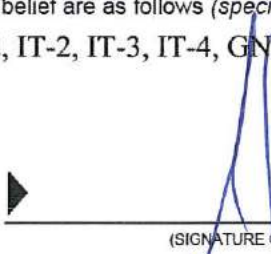
13. The relief sought in this complaint is within the jurisdiction of this court.

14. Plaintiff prays for judgment for costs of suit; for such relief as is fair, just, and equitable; and for
- a. (1)  compensatory damages
  - (2)  punitive damages
- The amount of damages is (*in cases for personal injury or wrongful death, you must check (1)*):
- (1)  according to proof
  - (2)  in the amount of: \$

15.  The paragraphs of this complaint alleged on information and belief are as follows (*specify paragraph numbers*):  
 AS INDICATED IN ATTACHMENT IT-1, FR-2, IT-2, IT-3, IT-4, GN-1, IT-5.

Date: 12-30-2022

Solomon E. Gresen, Esq.  
 \_\_\_\_\_  
 (TYPE OR PRINT NAME)

  
 \_\_\_\_\_  
 (SIGNATURE OF PLAINTIFF OR ATTORNEY)

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First \_\_\_\_\_ **CAUSE OF ACTION—Intentional Tort** Page 4  
 (number)

ATTACHMENT TO  Complaint  Cross - Complaint

(Use a separate cause of action form for each cause of action.)

IT-1. Plaintiff (name): Leonard Whiting and Olivia Hussey  
 alleges that defendant (name): Paramount Pictures Corp.

Does 1 to 100

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant intentionally caused the damage to plaintiff on (date) Sept. 1968 and cont. at (place) Hollywood, CA

(description of reasons for liability):

FIRST CAUSE OF ACTION FOR SEXUAL HARASSMENT (CA.CIV.CODE 51.9)

Pleased see attachment IT-1

## Attachment IT-1

### FIRST CAUSE OF ACTION FOR SEXUAL HARASSMENT (CA. CIV. CODE 51.9)

The 1968 major motion picture, *Romeo and Juliet* ("Romeo & Juliet" or the "Picture") was produced and distributed from Los Angeles, California in 1968 by defendant Paramount Pictures Corporation ("Paramount"). Franco Zeffirelli (deceased) directed the Picture and was the authorized agent of Paramount and sole decision maker with respect to the employment of plaintiff actors and the content of the film.

At the time of filming, Mr. Whiting (Romeo) was a minor child aged 16 years and Ms. Hussey was also a minor child aged 15 years. Plaintiffs were told by Mr. Zeffirelli that there would be no nudity filmed or exhibited, and that Plaintiffs would be wearing flesh colored undergarments during the bedroom/love scene. However, on the morning of the shoot of the bedroom scene in the second week of December, 1968, the very last days of the photography, the minor children Plaintiffs were given body make-up and were told by Mr. Zifferelli that they must act in the nude or the Picture would fail. Millions were invested. They would never work again in any profession, let alone Hollywood. Zifferelli showed them where the cameras would be set so that no nudity would be filmed or photographed for use in *Romeo & Juliet* or anywhere else. Plaintiffs believed they had no choice but to act in the nude with body makeup as demanded on the last days of filming.

Defendants were dishonest and secretly filmed the nude or partially nude minor children without their knowledge, in violation of the state and federal laws regulating indecency and exploitation of minors for profit and including conduct proscribed by Section 51.9 of the Civil Code; 266j of the Penal Code; Section 285 of the Penal Code; paragraph (1) or (2) of subdivision (b), or of subdivision (c), of Section 286 of the Penal Code; subdivision (a) or (b) of Section 288 of the Penal Code; paragraph (1) or (2) of subdivision (b), or of subdivision (c), of Section 287 or of former Section 288a of the Penal Code; subdivision (h), (i), or (j) of Section 289 of the Penal Code; Section 647.6 of the Penal Code; or any prior laws of this state of similar effect at the time the act was committed. At all times herein mentioned, Defendant Paramount and does 1 through 100, and each of them, knew or should have known images of Plaintiffs' nude bodies were secretly and unlawfully obtained during the performance for later use by Paramount and others. Plaintiffs are informed and believe, and therefore allege that Paramount engaged in conduct of a sexual nature when they filmed and later permitted the distribution of nude images of Plaintiffs as described above, and that and when Paramount a knew or should have known that those images were obtained through the coercion and/or deception of minors and was unwelcome, pervasive, and/or severe for the purposes of California Civil Code 51.9.

As a direct and proximate result of Defendants and each of their willful, knowing, and intentional violations of California law and otherwise sexually exploiting and harassing Mr. Whiting and Ms. Hussey as herein described, Plaintiffs have suffered and will continue to suffer physical and mental pain, along with extreme and severe mental anguish and emotional distress. Plaintiffs have incurred and will continue to incur medical expenses for treatment by psychotherapists and other health professionals, as well as for other incidental expenses. Plaintiffs have also suffered a lifetime of loss of earnings and other employment benefits and job

opportunities, and will continue to suffer such losses. Plaintiffs are thereby entitled to general and compensatory, economic and non-economic damages in amounts according to proof, along with disgorgement of the economic benefit to Paramount and Does 1-100, inclusive, which Plaintiffs are informed and believed to be in excess of \$500,000,000 since the Picture was originally released.

As a further direct and proximate result of Defendants and each of their willful, knowing, and intentional violations of California law and otherwise sexually exploiting and harassing Mr. Whiting and Ms. Hussey as herein described, Plaintiffs have been compelled to retain the services of legal counsel in an effort to protect their legal rights, and will continue to incur, legal fees and costs, the full nature and extent of which are presently unknown to Plaintiffs, who therefore will seek leave of Court to amend this Complaint in that regard when the same shall become known. Plaintiff requests that attorney and expert witness fees be awarded per code.

Plaintiff are informed, and believe, and thereon allege that the outrageous conduct of Defendants, and each of them, as described herein, was done with fraud, oppression and malice and with a conscious disregard for Plaintiffs' rights, and with the intent, design and purpose of injuring both Mr. Whiting and Ms. Hussey. Plaintiff is further informed, believes, and thereon alleges that Defendant Paramount, by and through its owners, shareholders, subsidiaries, officers, managing agents and/or their supervisors, authorized, condoned and/or ratified the unlawful conduct by their actions and inactions such as repackaging what is essentially pornography and evidence of a crime and then reselling that poisonous product for a profit over the objections of Mr. Whiting and Ms. Hussey since 1968. The time for this must be up. The knowing and repeated use of sexual images of minor children minors is the worst of behaviors in our society and must be eradicated. By reason thereof, Plaintiffs are therefore entitled to punitive or exemplary damages which Plaintiffs are informed and believe exceed \$100,000,000.

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Second \_\_\_\_\_ **CAUSE OF ACTION—Intentional Tort** Page 7  
 (number)

ATTACHMENT TO  Complaint  Cross - Complaint

*(Use a separate cause of action form for each cause of action.)*

IT-1. Plaintiff *(name)*: Leonard Whiting and Olivia Hussey  
 alleges that defendant *(name)*: Paramount Pictures Corp.

Does 1 to 100

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant intentionally caused the damage to plaintiff on *(date)* Sept. 1968 and cont. at *(place)* Hollywood, CA

*(description of reasons for liability):*

**SECOND CAUSE OF ACTION FOR FRAUD**

Pleased see attachment FR-2

## Attachment FR-2

THIRD CAUSE OF ACTION FOR CHILDHOOD SEXUAL ABUSE (CA. CODE OF CIV. PROC. 340.1)

The 1968 major motion picture, *Romeo and Juliet* ("Romeo & Juliet" or the "Picture") was produced and distributed from Los Angeles, California in 1968 by defendant Paramount Pictures Corporation ("Paramount"). Franco Zeffirelli (deceased) directed the Picture and was the authorized agent of Paramount and sole decision maker with respect to the employment of plaintiff actors and the content of the film.

At the time of filming, Mr. Whiting (Romeo) was a minor child aged 16 years and Ms. Hussey was also a minor child aged 15 years. Plaintiffs were told by Mr. Zeffirelli that there would be no nudity filmed or exhibited, and that Plaintiffs would be wearing flesh colored undergarments during the bedroom/love scene. However, on the morning of the shoot of the bedroom scene in the second week of December, 1968, the very last days of the photography, the minor children Plaintiffs were given body make-up and were told by Mr. Zifferelli that they must act in the nude or the Picture would fail. Millions were invested. They would never work again in any profession, let alone Hollywood. Zifferelli showed them where the cameras would be set so that no nudity would be filmed or photographed for use in *Romeo & Juliet* or anywhere else. Plaintiffs believed they had no choice but to act in the nude with body makeup as demanded on the last days of filming.

Defendants were dishonest and secretly filmed the nude or partially nude minor children without their knowledge, in violation of the state and federal laws regulating child sexual abuse and exploitation; 266j of the Penal Code; Section 285 of the Penal Code; paragraph (1) or (2) of subdivision (b), or of subdivision (c), of Section 286 of the Penal Code; subdivision (a) or (b) of Section 288 of the Penal Code; paragraph (1) or (2) of subdivision (b), or of subdivision (c), of Section 287 or of former Section 288a of the Penal Code; subdivision (h), (i), or (j) of Section 289 of the Penal Code; Section 647.6 of the Penal Code; or any prior laws of this state of similar effect at the time the act was committed. At all times herein mentioned, Defendant Paramount and does 1 through 100, and each of them, knew or should have known images of Plaintiffs' nude bodies were secretly and unlawfully obtained during the performance for later use by Paramount and others. Plaintiffs are informed and believe, and therefore allege that Paramount engaged in child sexual abuse when they filmed and later permitted the distribution of nude images of Plaintiffs when Paramount a knew or should have known that those images were nude images of adolescent children.

As a direct and proximate result of Defendants and each of their willful, knowing, and intentional violations of California law and otherwise sexually exploiting and harassing Mr. Whiting and Ms. Hussey as herein described, Plaintiffs have suffered and will continue to suffer physical and mental pain, along with extreme and severe mental anguish and emotional distress. Plaintiffs have incurred and will continue to incur medical expenses for treatment by psychotherapists and other health professionals, as well as for other incidental expenses. Plaintiffs have also suffered a lifetime of loss of earnings and other employment benefits and job opportunities, ad will continue to suffer such losses. Plaintiffs are thereby entitled to general and



compensatory, economic and non-economic damages in amounts according to proof, along with disgorgement of the economic benefit to Paramount and Does 1-100, inclusive, which Plaintiffs are informed and believed to be in excess of \$500,000,000 since the Picture was originally released.

As a further direct and proximate result of Defendants and each of their willful, knowing, and intentional violations of California law and otherwise sexually exploiting and harassing Mr. Whiting and Ms. Hussey as herein described, Plaintiffs have been compelled to retain the services of legal counsel in an effort to protect their legal rights, and will continue to incur, legal fees and costs, the full nature and extent of which are presently unknown to Plaintiffs, who therefore will seek leave of Court to amend this Complaint in that regard when the same shall become known. Plaintiff requests that attorney and expert witness fees be awarded per code.

Plaintiff are informed, and believe, and thereon allege that the outrageous conduct of Defendants, and each of them, as described herein, was done with fraud, oppression and malice and with a conscious disregard for Plaintiffs' rights, and with the intent, design and purpose of injuring both Mr. Whiting and Ms. Hussey. Plaintiff is further informed, believes, and thereon alleges that Defendant Paramount, by and through its owners, shareholders, subsidiaries, officers, managing agents and/or their supervisors, authorized, condoned and/or ratified the unlawful conduct by their actions and inactions such as repackaging what is essentially pornography and evidence of a crime and then reselling that poisonous product for a profit over the objections of Mr. Whiting and Ms. Hussey since 1968. The time for this must be up. The knowing and repeated use of sexual images of minor children minors is the worst of behaviors in our society and must be eradicated. By reason thereof, Plaintiffs are therefore entitled to punitive or exemplary damages which Plaintiffs are informed and believe exceed \$100,000,000.

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Third \_\_\_\_\_ CAUSE OF ACTION—Intentional Tort Page 10  
 (number)

ATTACHMENT TO  Complaint  Cross - Complaint

(Use a separate cause of action form for each cause of action.)

IT-1. Plaintiff (name): Leonard Whiting and Olivia Hussey  
 alleges that defendant (name): Paramount Pictures Corp.

Does 1 \_\_\_\_\_ to 100 \_\_\_\_\_

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant intentionally caused the damage to plaintiff on (date) Sept. 1968 and cont. at (place) Hollywood, CA

(description of reasons for liability):

THIRD CAUSE OF ACTION FOR CHILDHOOD SEXUAL ABUSE (CA.CODE OF CIV. PROC. 340.1)

Pleased see attachment IT-2

## Attachment IT-2

### THIRD CAUSE OF ACTION FOR CHILDHOOD SEXUAL ABUSE (CA. CODE OF CIV. PROC. 340.1)

The 1968 major motion picture, *Romeo and Juliet* ("Romeo & Juliet" or the "Picture") was produced and distributed from Los Angeles, California in 1968 by defendant Paramount Pictures Corporation ("Paramount"). Franco Zeffirelli (deceased) directed the Picture and was the authorized agent of Paramount and sole decision maker with respect to the employment of plaintiff actors and the content of the film.

At the time of filming, Mr. Whiting (Romeo) was a minor child aged 16 years and Ms. Hussey was also a minor child aged 15 years. Plaintiffs were told by Mr. Zeffirelli that there would be no nudity filmed or exhibited, and that Plaintiffs would be wearing flesh colored undergarments during the bedroom/love scene. However, on the morning of the shoot of the bedroom scene in the second week of December, 1968, the very last days of the photography, the minor children Plaintiffs were given body make-up and were told by Mr. Zifferelli that they must act in the nude or the Picture would fail. Millions were invested. They would never work again in any profession, let alone Hollywood. Zifferelli showed them where the cameras would be set so that no nudity would be filmed or photographed for use in *Romeo & Juliet* or anywhere else. Plaintiffs believed they had no choice but to act in the nude with body makeup as demanded on the last days of filming.

Defendants were dishonest and secretly filmed the nude or partially nude minor children without their knowledge, in violation of the state and federal laws regulating child sexual abuse and exploitation; 266j of the Penal Code; Section 285 of the Penal Code; paragraph (1) or (2) of subdivision (b), or of subdivision (c), of Section 286 of the Penal Code; subdivision (a) or (b) of Section 288 of the Penal Code; paragraph (1) or (2) of subdivision (b), or of subdivision (c), of Section 287 or of former Section 288a of the Penal Code; subdivision (h), (i), or (j) of Section 289 of the Penal Code; Section 647.6 of the Penal Code; or any prior laws of this state of similar effect at the time the act was committed. At all times herein mentioned, Defendant Paramount and does 1 through 100, and each of them, knew or should have known images of Plaintiffs' nude bodies were secretly and unlawfully obtained during the performance for later use by Paramount and others. Plaintiffs are informed and believe, and therefore allege that Paramount engaged in child sexual abuse when they filmed and later permitted the distribution of nude images of Plaintiffs when Paramount a knew or should have known that those images were nude images of adolescent children.

As a direct and proximate result of Defendants and each of their willful, knowing, and intentional violations of California law and otherwise sexually exploiting and harassing Mr. Whiting and Ms. Hussey as herein described, Plaintiffs have suffered and will continue to suffer physical and mental pain, along with extreme and severe mental anguish and emotional distress. Plaintiffs have incurred and will continue to incur medical expenses for treatment by psychotherapists and other health professionals, as well as for other incidental expenses. Plaintiffs have also suffered a lifetime of loss of earnings and other employment benefits and job opportunities, ad will continue to suffer such losses. Plaintiffs are thereby entitled to general and

compensatory, economic and non-economic damages in amounts according to proof, along with disgorgement of the economic benefit to Paramount and Does 1-100, inclusive, which Plaintiffs are informed and believed to be in excess of \$500,000,000 since the Picture was originally released.

As a further direct and proximate result of Defendants and each of their willful, knowing, and intentional violations of California law and otherwise sexually exploiting and harassing Mr. Whiting and Ms. Hussey as herein described, Plaintiffs have been compelled to retain the services of legal counsel in an effort to protect their legal rights, and will continue to incur, legal fees and costs, the full nature and extent of which are presently unknown to Plaintiffs, who therefore will seek leave of Court to amend this Complaint in that regard when the same shall become known. Plaintiff requests that attorney and expert witness fees be awarded per code.

Plaintiff are informed, and believe, and thereon allege that the outrageous conduct of Defendants, and each of them, as described herein, was done with fraud, oppression and malice and with a conscious disregard for Plaintiffs' rights, and with the intent, design and purpose of injuring both Mr. Whiting and Ms. Hussey. Plaintiff is further informed, believes, and thereon alleges that Defendant Paramount, by and through its owners, shareholders, subsidiaries, officers, managing agents and/or their supervisors, authorized, condoned and/or ratified the unlawful conduct by their actions and inactions such as repackaging what is essentially pornography and evidence of a crime and then reselling that poisonous product for a profit over the objections of Mr. Whiting and Ms. Hussey since 1968. The time for this must be up. The knowing and repeated use of sexual images of minor children minors is the worst of behaviors in our society and must be eradicated. By reason thereof, Plaintiffs are therefore entitled to punitive or exemplary damages which Plaintiffs are informed and believe exceed \$100,000,000.

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Fourth \_\_\_\_\_ CAUSE OF ACTION—Intentional Tort Page 13  
 (number)

ATTACHMENT TO  Complaint  Cross - Complaint

(Use a separate cause of action form for each cause of action.)

IT-1. Plaintiff (name): Leonard Whiting and Olivia Hussey  
 alleges that defendant (name): Paramount Pictures Corp.

Does 1 \_\_\_\_\_ to 100 \_\_\_\_\_

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant intentionally caused the damage to plaintiff on (date) Sept. 1968 and cont. at (place) Hollywood, CA

(description of reasons for liability):

FOURTH CAUSE OF ACTION FOR APPROPRIATE OF NAME AND LIKENESS (CA. CIVIL CODE 3344)

Pleased see attachment IT-3

### Attachment IT-3

#### FOURTH CAUSE OF ACTION FOR APPROPRIATION OF NAME AND LIKENESS (CA. CIVIL CODE 3344)

The 1968 major motion picture, *Romeo and Juliet* ("Romeo & Juliet" or the "Picture") was produced and distributed from Los Angeles, California in 1968 by defendant Paramount Pictures Corporation ("Paramount"). Franco Zeffirelli (deceased) directed the Picture and was the authorized agent of Paramount and sole decision maker with respect to the employment of plaintiff actors and the content of the film.

At the time of filming, Mr. Whiting (Romeo) was a minor child aged 16 years and Ms. Hussey was also a minor child aged 15 years. Plaintiffs were told by Mr. Zeffirelli that there would be no nudity filmed or exhibited, and that Plaintiffs would be wearing flesh colored undergarments during the bedroom/love scene. However, on the morning of the shoot of the bedroom scene in the second week of December, 1968, the very last days of the photography, the minor children Plaintiffs were given body make-up and were told by Mr. Zifferelli that they must act in the nude or the Picture would fail. Millions were invested. They would never work again in any profession, let alone Hollywood. Zifferelli showed them where the cameras would be set so that no nudity would be filmed or photographed for use in *Romeo & Juliet* or anywhere else. Plaintiffs believed they had no choice but to act in the nude with body makeup as demanded on the last days of filming.

Defendants were dishonest and secretly filmed the nude or partially nude minor children without their knowledge, in violation of the state and federal laws regulating appropriation, child sexual abuse and exploitation including without limitation Section 3344 of the Civil Code; 266j of the Penal Code; Section 285 of the Penal Code; paragraph (1) or (2) of subdivision (b), or of subdivision (c), of Section 286 of the Penal Code; subdivision (a) or (b) of Section 288 of the Penal Code; paragraph (1) or (2) of subdivision (b), or of subdivision (c), of Section 287 or of former Section 288a of the Penal Code; subdivision (h), (i), or (j) of Section 289 of the Penal Code; Section 647.6 of the Penal Code; or any prior laws of this state of similar effect at the time the act was committed. At all times herein mentioned, Defendant Paramount and does 1 through 100, and each of them, knew or should have known images of Plaintiffs' nude bodies were secretly and unlawfully obtained during the performance for later use by Paramount and others. Plaintiffs are informed and believe, and therefore allege that Paramount engaged in unlawful appropriation of name and likeness when they filmed and later permitted the distribution of nude images of Plaintiffs when Paramount a knew or should have known that those images were nude images of adolescent children.

As a direct and proximate result of Defendants and each of their willful, knowing, and intentional violations of California law and otherwise sexually exploiting and harassing Mr. Whiting and Ms. Hussey and appropriation of their name and likeness as herein described, Plaintiffs have suffered and will continue to suffer physical and mental pain, along with extreme and severe mental anguish and emotional distress. Plaintiffs have incurred and will continue to incur medical expenses for treatment by psychotherapists and other health professionals, as well as for other incidental expenses. Plaintiffs have also suffered a lifetime of loss of earnings and

other employment benefits and job opportunities, and will continue to suffer such losses. Plaintiffs are thereby entitled to general and compensatory, economic and non-economic damages in amounts according to proof, along with disgorgement of the economic benefit to Paramount and Does 1-100, inclusive, which Plaintiffs are informed and believed to be in excess of \$500,000,000 since the Picture was originally released.

As a further direct and proximate result of Defendants and each of their willful, knowing, and intentional violations of California law and otherwise sexually exploiting and harassing Mr. Whiting and Ms. Hussey for their name and likeness as herein described, Plaintiffs have been compelled to retain the services of legal counsel in an effort to protect their legal rights, and will continue to incur, legal fees and costs, the full nature and extent of which are presently unknown to Plaintiffs, who therefore will seek leave of Court to amend this Complaint in that regard when the same shall become known. Plaintiff requests that attorney and expert witness fees be awarded per code.

Plaintiff are informed, and believe, and thereon allege that the outrageous conduct of Defendants, and each of them, as described herein, was done with fraud, oppression and malice and with a conscious disregard for Plaintiffs' rights, and with the intent, design and purpose of injuring both Mr. Whiting and Ms. Hussey. Plaintiff is further informed, believes, and thereon alleges that Defendant Paramount, by and through its owners, shareholders, subsidiaries, officers, managing agents and/or their supervisors, authorized, condoned and/or ratified the unlawful conduct by their actions and inactions such as repackaging what is essentially pornography and evidence of a crime and then reselling that poisonous product for a profit over the objections of Mr. Whiting and Ms. Hussey since 1968. The time for this must be up. The knowing and repeated use of sexual images of minor children minors is the worst of behaviors in our society and must be eradicated. By reason thereof, Plaintiffs are therefore entitled to punitive or exemplary damages which Plaintiffs are informed and believe exceed \$100,000,000.

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FIFTH \_\_\_\_\_ CAUSE OF ACTION—Intentional Tort Page 16  
 (number)

ATTACHMENT TO  Complaint  Cross - Complaint

(Use a separate cause of action form for each cause of action.)

IT-1. Plaintiff (name): Leonard Whiting and Olivia Hussey  
 alleges that defendant (name): Paramount Pictures Corp.

Does 1 \_\_\_\_\_ to 100 \_\_\_\_\_

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant intentionally caused the damage to plaintiff on (date)Sept. 1968 and cont. at (place)Hollywood, CA

(description of reasons for liability):

FIFTH CAUSE OF ACTION FOR INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS

Pleased see attachment IT-4



#### Attachment IT-4

### FIFTH CAUSE OF ACTION FOR INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

The 1968 major motion picture, *Romeo and Juliet* ("Romeo & Juliet" or the "Picture") was produced and distributed from Los Angeles, California in 1968 by defendant Paramount Pictures Corporation ("Paramount"). Franco Zeffirelli (deceased) directed the Picture and was the authorized agent of Paramount and sole decision maker with respect to the employment of plaintiff actors and the content of the film.

At the time of filming, Mr. Whiting (Romeo) was a minor child aged 16 years and Ms. Hussey was also a minor child aged 15 years. Plaintiffs were told by Mr. Zeffirelli that there would be no nudity filmed or exhibited, and that Plaintiffs would be wearing flesh colored undergarments during the bedroom/love scene. However, on the morning of the shoot of the bedroom scene in the second week of December, 1968, the very last days of the photography, the minor children Plaintiffs were given body make-up and were told by Mr. Zifferelli that they must act in the nude or the Picture would fail. Millions were invested. They would never work again in any profession, let alone Hollywood. Zifferelli showed them where the cameras would be set so that no nudity would be filmed or photographed for use in *Romeo & Juliet* or anywhere else. Plaintiffs believed they had no choice but to act in the nude with body makeup as demanded on the last days of filming.

Defendants were dishonest and secretly filmed the nude or partially nude minor children without their knowledge, in violation of the state and federal laws regulating appropriation, child sexual abuse and exploitation including without limitation Section 3344 of the Civil Code; 266j of the Penal Code; Section 285 of the Penal Code; paragraph (1) or (2) of subdivision (b), or of subdivision (c), of Section 286 of the Penal Code; subdivision (a) or (b) of Section 288 of the Penal Code; paragraph (1) or (2) of subdivision (b), or of subdivision (c), of Section 287 or of former Section 288a of the Penal Code; subdivision (h), (i), or (j) of Section 289 of the Penal Code; Section 647.6 of the Penal Code; or any prior laws of this state of similar effect at the time the act was committed. At all times herein mentioned, Defendant Paramount and does 1 through 100, and each of them, knew or should have known images of Plaintiffs' nude bodies were secretly and unlawfully obtained during the performance for later use by Paramount and others. Plaintiffs are informed and believe, and therefore allege that Paramount engaged in unlawful appropriation of name and likeness when they filmed and later permitted the distribution of nude images of Plaintiffs when Paramount a knew or should have known that those images were nude images of adolescent children.

As a direct and proximate result of Defendants and each of their willful, knowing, and intentional violations of California law and otherwise sexually exploiting and harassing Mr. Whiting and Ms. Hussey and appropriation of their name and likeness as herein described, Plaintiffs have suffered and will continue to suffer physical and mental pain, along with extreme and severe mental anguish and emotional distress. Plaintiffs have incurred and will continue to incur medical expenses for treatment by psychotherapists and other health professionals, as well as for other incidental expenses. Plaintiffs have also suffered a lifetime of loss of earnings and

other employment benefits and job opportunities, and will continue to suffer such losses. Plaintiffs are thereby entitled to general and compensatory, economic and non-economic damages in amounts according to proof, along with disgorgement of the economic benefit to Paramount and Does 1-100, inclusive, which Plaintiffs are informed and believed to be in excess of \$500,000,000 since the Picture was originally released.

As a further direct and proximate result of Defendants and each of their willful, knowing, and intentional violations of California law and otherwise sexually exploiting and harassing Mr. Whiting and Ms. Hussey for their name and likeness as herein described, Plaintiffs have been compelled to retain the services of legal counsel in an effort to protect their legal rights, and will continue to incur, legal fees and costs, the full nature and extent of which are presently unknown to Plaintiffs, who therefore will seek leave of Court to amend this Complaint in that regard when the same shall become known. Plaintiff requests that attorney and expert witness fees be awarded per code.

Plaintiff are informed, and believe, and thereon allege that the outrageous conduct of Defendants, and each of them, as described herein, was done with fraud, oppression and malice and with a conscious disregard for Plaintiffs' rights, and with the intent, design and purpose of injuring both Mr. Whiting and Ms. Hussey. Plaintiff is further informed, believes, and thereon alleges that Defendant Paramount, by and through its owners, shareholders, subsidiaries, officers, managing agents and/or their supervisors, authorized, condoned and/or ratified the unlawful conduct by their actions and inactions such as repackaging what is essentially pornography and evidence of a crime and then reselling that poisonous product for a profit over the objections of Mr. Whiting and Ms. Hussey since 1968. The time for this must be up. The knowing and repeated use of sexual images of minor children minors is the worst of behaviors in our society and must be eradicated. By reason thereof, Plaintiffs are therefore entitled to punitive or exemplary damages which Plaintiffs are informed and believe exceed \$100,000,000.

SHORT TITLE: Leonard Whiting, et al. v. Paramount Pictures Corp., et al.	CASE NUMBER
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Sixth \_\_\_\_\_ CAUSE OF ACTION—Intentional Tort Page 19  
 (number)

ATTACHMENT TO  Complaint  Cross - Complaint

(Use a separate cause of action form for each cause of action.)

IT-1. Plaintiff (name): Leonard Whiting and Olivia Hussey  
 alleges that defendant (name): Paramount Pictures Corp.

Does 1 \_\_\_\_\_ to 100 \_\_\_\_\_

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant intentionally caused the damage to plaintiff on (date) Sept. 1968 and cont. at (place) Hollywood, CA

(description of reasons for liability):

SIXTH CAUSE OF ACTION FOR NEGLIGENCE

Pleased see attachment GN-1

## Attachment GN-1

### SIXTH CAUSE OF ACTION FOR NEGLIGENCE

The 1968 major motion picture, *Romeo and Juliet* ("Romeo & Juliet" or the "Picture") was produced and distributed from Los Angeles, California in 1968 by defendant Paramount Pictures Corporation ("Paramount"). Franco Zeffirelli (deceased) directed the Picture and was the authorized agent of Paramount and sole decision maker with respect to the employment of plaintiff actors and the content of the film.

At the time of filming, Mr. Whiting (Romeo) was a minor child aged 16 years and Ms. Hussey was also a minor child aged 15 years. Plaintiffs were told by Mr. Zeffirelli that there would be no nudity filmed or exhibited, and that Plaintiffs would be wearing flesh colored undergarments during the bedroom/love scene. However, on the morning of the shoot of the bedroom scene in the second week of December, 1968, the very last days of the photography, the minor children Plaintiffs were given body make-up and were told by Mr. Zifferelli that they must act in the nude or the Picture would fail. Millions were invested. They would never work again in any profession, let alone Hollywood. Zifferelli showed them where the cameras would be set so that no nudity would be filmed or photographed for use in *Romeo & Juliet* or anywhere else. Plaintiffs believed they had no choice but to act in the nude with body makeup as demanded on the last days of filming. Paramount owed a duty to protect their minor children employees from child and sexual exploitation.

Defendants were dishonest and secretly filmed the nude or partially nude minor children without their knowledge, in violation of the state and federal laws regulating indecency and exploitation of minors for profit and including conduct proscribed by Section 51.9 of the Civil Code; 266j of the Penal Code; Section 285 of the Penal Code; paragraph (1) or (2) of subdivision (b), or of subdivision (c), of Section 286 of the Penal Code; subdivision (a) or (b) of Section 288 of the Penal Code; paragraph (1) or (2) of subdivision (b), or of subdivision (c), of Section 287 or of former Section 288a of the Penal Code; subdivision (h), (i), or (j) of Section 289 of the Penal Code; Section 647.6 of the Penal Code; or any prior laws of this state of similar effect at the time the act was committed. At all times herein mentioned, Defendant Paramount and does 1 through 100, and each of them, knew or should have known images of Plaintiffs' nude bodies were secretly and unlawfully obtained during the performance for later use by Paramount and others. Plaintiffs are informed and believe, and therefore allege that Paramount engaged in conduct of a sexual nature when they filmed and later permitted the distribution of nude images of Plaintiffs as described above, and that and when Paramount a knew or should have known that those images were obtained through the coercion and/or deception of minors and was unwelcome, pervasive, and/or severe, such that Paramount breached its duty as described above.

As a direct and proximate result of Defendants and each of their willful, knowing, and intentional violations of California law and otherwise sexually exploiting and harassing Mr. Whiting and Ms. Hussey as herein described, Plaintiffs have suffered and will continue to suffer physical and mental pain, along with extreme and severe mental anguish and emotional distress. Plaintiffs have incurred and will continue to incur medical expenses for treatment by psychotherapists and other health professionals, as well as for other incidental expenses.

Plaintiffs have also suffered a lifetime of loss of earnings and other employment benefits and job opportunities, and will continue to suffer such losses. Plaintiffs are thereby entitled to general and compensatory, economic and non-economic damages in amounts according to proof, along with disgorgement of the economic benefit to Paramount and Does 1-100, inclusive, which Plaintiffs are informed and believed to be in excess of \$500,000,000 since the Picture was originally released.

SHORT TITLE: Leonard Whiting, et al. v. Paramount Pictures Corp., et al.	CASE NUMBER
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Seventh \_\_\_\_\_ CAUSE OF ACTION—Intentional Tort Page 22  
 (number)

ATTACHMENT TO  Complaint  Cross - Complaint

(Use a separate cause of action form for each cause of action.)

IT-1. Plaintiff (name): Leonard Whiting and Olivia Hussey  
 alleges that defendant (name): Paramount Pictures Corp.

Does 1 to 100

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant intentionally caused the damage to plaintiff on (date)Sept. 1968 and cont. at (place)Hollywood, CA

(description of reasons for liability):

SEVENTH CAUSE OF ACTION FOR UNFAIR BUSINESS PRACTICES (CA. BUS. & PROF. CODE 17200)

Pleased see attachment IT-5

## Attachment IT-5

### SEVENTH CAUSE OF ACTION FOR UNFAIR BUSINESS PRACTICES (CA. BUS. & PROF CODE 17200)

Plaintiffs are informed and believe that all of the Defendants have engaged in unlawful, unfair, and deceptive business practices in connection with the commercial sexual exploitation of the nude images of Plaintiffs, which were created while Plaintiffs were minors. Through such commercial exploitation, Defendants have earned profits and have intensified and extended the sexual abuse of Plaintiffs that began while Plaintiffs were filmed and/or photographed while nude or partially nude during the production of the Picture. Defendants' wrongful conduct and unfair business practices also include their failure to prevent the sexual exploitation of Plaintiffs, their concealment of that exploitation, and their deliberate action to profit from that exploitation.

Plaintiff is informed and believes that Defendants have engaged in a common scheme, arrangement, or plan to effect the sexual abuse of Plaintiffs, to conceal such abuse, and to profit from such abuse. By engaging in such unlawful, unfair, and deceptive business practices, Defendants have benefitted financially to the detriment of their competitors and to the detriment of Plaintiffs. Unless restrained, Defendants will continue to engage in the unlawful, unfair, and deceptive business practices that are alleged in this complaint, resulting in great and irreparable harm to Plaintiffs and others.

Plaintiffs seek restitution for all amounts improperly obtained by Defendants through their exploitation of the unlawful, unfair, and deceptive business practices that are alleged in this Complaint. Pursuant to § 17203 of the California Business and Professions Code, and pursuant to this Court's general and inherent equitable authority, Plaintiffs are entitled to preliminary and permanent injunctive relief, enjoining Defendants from continuing the unlawful, unfair, and deceptive business practices that are alleged in this Complaint. In addition, Plaintiffs seek the appointment of a court monitor to enforce this Court's orders, and Plaintiffs are entitled to recover reasonable attorneys' fees according to the California Business and Professions Code and to § 1021.5 of the California Code of Civil Procedure.

SHORT TITLE:

Leonard Whiting, et al. v. Paramount Pictures Corp., et al.

CASE NUMBER:

**Exemplary Damages Attachment**Page 24ATTACHMENT TO  Complaint  Cross - ComplaintEX-1. As additional damages against defendant (*name*):

Plaintiff alleges defendant was guilty of

 malice fraud oppression

as defined in Civil Code section 3294, and plaintiff should recover, in addition to actual damages, damages to make an example of and to punish defendant.

EX-2. The facts supporting plaintiff's claim are as follows:

Plaintiff are informed, and believe, and thereon allege that the outrageous conduct of Defendants, and each of them, as described herein, was done with fraud, oppression and malice and with a conscious disregard for Plaintiffs' rights, and with the intent, design and purpose of injuring both Mr. Whiting and Ms. Hussey. Plaintiff is further informed, believes, and thereon alleges that Defendant Paramount, by and through its owners, shareholders, subsidiaries, officers, managing agents and/or their supervisors, authorized, condoned and/or ratified the unlawful conduct by their actions and inactions such as repackaging what is essentially pornography and evidence of a crime and then reselling that poisonous product for a profit over the objections of Mr. Whiting and Ms. Hussey since 1968. The time for this must be up. The knowing and repeated use of sexual images of minor children minors is the worst of behaviors in our society and must be eradicated. By reason thereof, Plaintiffs are therefore entitled to punitive or exemplary damages which Plaintiffs are informed and believe exceed \$100,000,000.

EX-3. The amount of exemplary damages sought is

a.  not shown, pursuant to Code of Civil Procedure section 425.10.b.  \$



ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):

Solmon Gresen, Esq. RG Lawyers, LLP, SBN: 164783  
16200 Ventura Blvd., Ste. 216, Encino, CA 92436

TELEPHONE NO.: 818-815-2727 FAX NO. (Optional):

E-MAIL ADDRESS: SEG@RGLAYERS.COM

ATTORNEY FOR (Name): Plaintiffs, Leonard Whiting and Olivia Hussey

FOR COURT USE ONLY

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES**

STREET ADDRESS: 1725 MAIN ST  
MAILING ADDRESS: SANTA MONICA 90401  
CITY AND ZIP CODE: WEST  
BRANCH NAME: WEST

**CASE NAME:**

Leonard Whiting, et al. v. Paramount Pictures Corporation, et al.

**CIVIL CASE COVER SHEET**

**Unlimited** (Amount demanded exceeds \$25,000)  **Limited** (Amount demanded is \$25,000 or less)

**Complex Case Designation**

Counter  Joinder  
Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

CASE NUMBER:

JUDGE:

DEPT.:

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

**Auto Tort**

- Auto (22)
- Uninsured motorist (46)

**Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort**

- Asbestos (04)
- Product liability (24)
- Medical malpractice (45)
- Other PI/PD/WD (23)

**Non-PI/PD/WD (Other) Tort**

- Business tort/unfair business practice (07)
- Civil rights (08)
- Defamation (13)
- Fraud (16)
- Intellectual property (19)
- Professional negligence (25)
- Other non-PI/PD/WD tort (35)

**Employment**

- Wrongful termination (36)
- Other employment (15)

**Contract**

- Breach of contract/warranty (06)
- Rule 3.740 collections (09)
- Other collections (09)
- Insurance coverage (18)
- Other contract (37)

**Real Property**

- Eminent domain/Inverse condemnation (14)
- Wrongful eviction (33)
- Other real property (26)

**Unlawful Detainer**

- Commercial (31)
- Residential (32)
- Drugs (38)

**Judicial Review**

- Asset forfeiture (05)
- Petition re: arbitration award (11)
- Writ of mandate (02)
- Other judicial review (39)

**Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)**

- Antitrust/Trade regulation (03)
- Construction defect (10)
- Mass tort (40)
- Securities litigation (28)
- Environmental/Toxic tort (30)
- Insurance coverage claims arising from the above listed provisionally complex case types (41)

**Enforcement of Judgment**

- Enforcement of judgment (20)

**Miscellaneous Civil Complaint**

- RICO (27)
- Other complaint (not specified above) (42)

**Miscellaneous Civil Petition**

- Partnership and corporate governance (21)
- Other petition (not specified above) (43)

2. This case  is  is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:

- a.  Large number of separately represented parties
- b.  Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve
- c.  Substantial amount of documentary evidence
- d.  Large number of witnesses
- e.  Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
- f.  Substantial postjudgment judicial supervision

3. Remedies sought (check all that apply): a.  monetary b.  nonmonetary; declaratory or injunctive relief c.  punitive

4. Number of causes of action (specify): SEVEN

5. This case  is  is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: 12-30-2022

SOLOMON E. GRESEN, ESQ.

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

**NOTICE**

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

**To Plaintiffs and Others Filing First Papers.** If you are filing a first paper (for example, a complaint) in a civil case, you **must** complete and file, along with your first paper, the Civil Case Cover Sheet contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check **one** box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

**To Parties in Rule 3.740 Collections Cases.** A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

**To Parties in Complex Cases.** In complex cases only, parties must also use the Civil Case Cover Sheet to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

### CASE TYPES AND EXAMPLES

#### Auto Tort

Auto (22)—Personal Injury/Property Damage/Wrongful Death  
Uninsured Motorist (46) (*if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto*)

#### Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

Asbestos (04)  
Asbestos Property Damage  
Asbestos Personal Injury/Wrongful Death  
Product Liability (*not asbestos or toxic/environmental*) (24)  
Medical Malpractice (45)  
Medical Malpractice—Physicians & Surgeons  
Other Professional Health Care Malpractice  
Other PI/PD/WD (23)  
Premises Liability (e.g., slip and fall)  
Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)  
Intentional Infliction of Emotional Distress  
Negligent Infliction of Emotional Distress  
Other PI/PD/WD

#### Non-PI/PD/WD (Other) Tort

Business Tort/Unfair Business Practice (07)  
Civil Rights (e.g., discrimination, false arrest) (*not civil harassment*) (08)  
Defamation (e.g., slander, libel) (13)  
Fraud (16)  
Intellectual Property (19)  
Professional Negligence (25)  
Legal Malpractice  
Other Professional Malpractice (*not medical or legal*)  
Other Non-PI/PD/WD Tort (35)

#### Employment

Wrongful Termination (36)  
Other Employment (15)

#### Contract

Breach of Contract/Warranty (06)  
Breach of Rental/Lease  
Contract (*not unlawful detainer or wrongful eviction*)  
Contract/Warranty Breach—Seller Plaintiff (*not fraud or negligence*)  
Negligent Breach of Contract/Warranty  
Other Breach of Contract/Warranty  
Collections (e.g., money owed, open book accounts) (09)  
Collection Case—Seller Plaintiff  
Other Promissory Note/Collections Case  
Insurance Coverage (*not provisionally complex*) (18)  
Auto Subrogation  
Other Coverage  
Other Contract (37)  
Contractual Fraud  
Other Contract Dispute

#### Real Property

Eminent Domain/Inverse Condemnation (14)  
Wrongful Eviction (33)  
Other Real Property (e.g., quiet title) (26)  
Writ of Possession of Real Property  
Mortgage Foreclosure  
Quiet Title  
Other Real Property (*not eminent domain, landlord/tenant, or foreclosure*)

#### Unlawful Detainer

Commercial (31)  
Residential (32)  
Drugs (38) (*if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential*)

#### Judicial Review

Asset Forfeiture (05)  
Petition Re: Arbitration Award (11)  
Writ of Mandate (02)  
Writ—Administrative Mandamus  
Writ—Mandamus on Limited Court Case Matter  
Writ—Other Limited Court Case Review  
Other Judicial Review (39)  
Review of Health Officer Order  
Notice of Appeal—Labor Commissioner Appeals

#### Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)

Antitrust/Trade Regulation (03)  
Construction Defect (10)  
Claims Involving Mass Tort (40)  
Securities Litigation (28)  
Environmental/Toxic Tort (30)  
Insurance Coverage Claims (*arising from provisionally complex case type listed above*) (41)

#### Enforcement of Judgment

Enforcement of Judgment (20)  
Abstract of Judgment (Out of County)  
Confession of Judgment (*non-domestic relations*)  
Sister State Judgment  
Administrative Agency Award (*not unpaid taxes*)  
Petition/Certification of Entry of Judgment on Unpaid Taxes  
Other Enforcement of Judgment Case

#### Miscellaneous Civil Complaint

RICO (27)  
Other Complaint (*not specified above*) (42)  
Declaratory Relief Only  
Injunctive Relief Only (*non-harassment*)  
Mechanics Lien  
Other Commercial Complaint Case (*non-tort/non-complex*)  
Other Civil Complaint (*non-tort/non-complex*)

#### Miscellaneous Civil Petition

Partnership and Corporate Governance (21)  
Other Petition (*not specified above*) (43)  
Civil Harassment  
Workplace Violence  
Elder/Dependent Adult Abuse  
Election Contest  
Petition for Name Change  
Petition for Relief From Late Claim  
Other Civil Petition

SHORT TITLE:

LEONARD WHITING, et al. V. PARAMOUNT PICTURES CORP., et al

CASE NUMBER

**CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION  
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

**This form is required pursuant to LASC Local Rule 2.0 in all new civil case filings in the Los Angeles Superior Court.**

Item I. Check the types of hearing and fill in the estimated length of hearing expected for this case:

JURY TRIAL?  YES CLASS ACTION?  YES LIMITED CASE?  YES TIME ESTIMATED FOR TRIAL 10  HOURS/  DAYS

Item II. Select the correct district and courthouse location (4 steps – If you checked “Limited Case”, skip to Item III, Pg. 4):

**Step 1:** After first completing the Civil Case Cover Sheet Form, find the main civil case cover sheet heading for your case in the left margin below, and, to the right in Column **A**, the Civil Case Cover Sheet case type you selected.

**Step 2:** Check one Superior Court type of action in Column **B** below which best describes the nature of this case.

**Step 3:** In Column **C**, circle the reason for the court location choice that applies to the type of action you have checked. For any exception to the court location, see Los Angeles Superior Court Local Rule 2.0.

**Applicable Reasons for Choosing Courthouse Location (see Column C below)**

- |   |  |
|---|--|
| 1. Class Actions must be filed in the County Courthouse, Central District.      | 6. Location of property or permanently garaged vehicle.    |
| 2. May be filed in Central (Other county, or no Bodily Injury/Property Damage). | 7. Location where petitioner resides.                      |
| 3. Location where cause of action arose.  | 8. Location wherein defendant/respondent functions wholly. |
| 4. Location where bodily injury, death or damage occurred.                      | 9. Location where one or more of the parties reside.       |
| 5. Location where performance required or defendant resides.                    | 10. Location of Labor Commissioner Office.                 |

**Step 4:** Fill in the information requested on page 4 in Item III; complete Item IV. Sign the declaration.

	<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
Auto Tort	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
	Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1., 2., 4.
Other Personal Injury/Property Damage/Wrongful Death Tort	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage	2.
		<input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	2.
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
	Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons	1., 2., 4.
		<input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 2., 4.
Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1., 2., 4.	
	<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1., 2., 4.	
	<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress	1., 2., 3.	
	<input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 2., 4.	
Business Tort (07)	A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 2., 3.	
Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.	
Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.	
Fraud (16)	<input checked="" type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.	

SHORT TITLE: LEONARD WHITING, et al. V. PARAMOUNT PICTURES CORP., et al	CASE NUMBER
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<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons -See Step 3 Above
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice	1., 2., 3.
	<input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3.
Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2., 3.
Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case	1., 2., 3.
	<input type="checkbox"/> A6109 Labor Commissioner Appeals	10.
Breach of Contract/Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not Unlawful Detainer or wrongful eviction)	2., 5.
	<input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence)	2., 5.
	<input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud)	1., 2., 5.
	<input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	1., 2., 5.
Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff	2., 5., 6.
	<input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5.
Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud	1., 2., 3., 5.
	<input type="checkbox"/> A6031 Tortious Interference	1., 2., 3., 5.
	<input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 8.
Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation      Number of parcels _____	2.
Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure	2., 6.
	<input type="checkbox"/> A6032 Quiet Title	2., 6.
	<input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6.
Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.
Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2., 6.
Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.

SHORT TITLE: LEONARD WHITING, et al. V. PARAMOUNT PICTURES CORP., et al	CASE NUMBER
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Judicial Review (Cont'd.)

Provisionally Complex Litigation

Enforcement of Judgment

Miscellaneous Civil Complaints

Miscellaneous Civil Petitions

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2., 8. 2. 2.
Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2., 8.
Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1., 2., 8.
Construction Defect (10)	<input type="checkbox"/> A6007 Construction defect	1., 2., 3.
Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1., 2., 8.
Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.
Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.
Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1., 2., 5., 8.
Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment <input type="checkbox"/> A6160 Abstract of Judgment <input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations) <input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes) <input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax <input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 9. 2., 6. 2., 9. 2., 8. 2., 8. 2., 8., 9.
RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1., 2., 8.
Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only <input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment) <input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex) <input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1., 2., 8. 2., 8. 1., 2., 8. 1., 2., 8.
Partnership Corporation Governance(21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2., 8.
Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment <input type="checkbox"/> A6123 Workplace Harassment <input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case <input type="checkbox"/> A6190 Election Contest <input type="checkbox"/> A6110 Petition for Change of Name <input type="checkbox"/> A6170 Petition for Relief from Late Claim Law <input type="checkbox"/> A6100 Other Civil Petition	2., 3., 9. 2., 3., 9. 2., 3., 9. 2. 2., 7. 2., 3., 4., 8. 2., 9.


SHORT TITLE: LEONARD WHITING, et al. V. PARAMOUNT PICTURES CORP., et al	CASE NUMBER
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Item III. Statement of Location: Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., Step 3 on Page 1, as the proper reason for filing in the court location you selected.

REASON: CHECK THE NUMBER UNDER COLUMN C WHICH APPLIES IN THIS CASE <input checked="" type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input checked="" type="checkbox"/> 3. <input type="checkbox"/> 4. <input checked="" type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.		ADDRESS: Paramount Studios, 5555 Melrose Avenue
CITY: Hollywood	STATE: CA	ZIP CODE: 90038

Item IV. Declaration of Assignment: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that the above-entitled matter is properly filed for assignment to the Santa Monica courthouse in the West District of the Los Angeles Superior Court (Code Civ. Proc., § 392 et seq., and LASC Local Rule 2.0, subs. (b), (c) and (d)).

Dated: 12-30-2022

  
\_\_\_\_\_  
(SIGNATURE OF ATTORNEY/FILING PARTY)

**PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:**

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet form CM-010.
4. Complete Addendum to Civil Case Cover Sheet form LASC Approved CIV 109 03-04 (Rev. 03/06).
5. Payment in full of the filing fee, unless fees have been waived.
6. Signed order appointing the Guardian ad Litem, JC form 982(a)(27), if the plaintiff or petitioner is a minor under 18 years of age, or if required by Court.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

**SUMMONS  
(CITACION JUDICIAL)**

FOR COURT USE ONLY  
(SOLO PARA USO DE LA CORTE)

**NOTICE TO DEFENDANT:  
(AVISO AL DEMANDADO):**

PARAMOUNT PICTURES CORPORATION, A DELAWARE CORP.; AND DOES 1 TO 100

**YOU ARE BEING SUED BY PLAINTIFF:  
(LO ESTÁ DEMANDANDO EL DEMANDANTE):**

LEONARD WHITING AND OLIVIA HUSSEY

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **¡AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California ([www.sucorte.ca.gov](http://www.sucorte.ca.gov)), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), en el Centro de Ayuda de las Cortes de California, ([www.sucorte.ca.gov](http://www.sucorte.ca.gov)) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:

(El nombre y dirección de la corte es): *Santa Monica Courthouse  
1725 Main Street, Santa Monica, CA 90401*

CASE NUMBER:  
(Número del Caso):

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:

(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

DATE:  
(Fecha)

Clerk, by  
(Secretario)

, Deputy  
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

[SEAL]

**NOTICE TO THE PERSON SERVED: You are served**

1.  as an individual defendant.
2.  as the person sued under the fictitious name of (specify):
3.  on behalf of (specify):  
under:  CCP 416.10 (corporation)  CCP 416.60 (minor)  
 CCP 416.20 (defunct corporation)  CCP 416.70 (conservatee)  
 CCP 416.40 (association or partnership)  CCP 416.90 (authorized person)  
 other (specify):
4.  by personal delivery on (date):