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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

12 BRIAN WARNER, p/k/a MARILYN
13 MANSON,

14 Plaintiff,

15 v.

16 EVAN RACHEL WOOD, ASHLEY GORE
17 a/k/a ILLMA GORE,

18 Defendants.

Case No. 22STCV07568

**DEFENDANT ASHLEY GORE a/k/a
ILLMA GORE'S NOTICE OF MOTION
AND SPECIAL MOTION TO STRIKE
PURSUANT TO CODE OF CIVIL
PROCEDURE § 425.16 ("ANTI-SLAPP
MOTION")**

Reservation: 662859254881

Judge: Hon. Teresa A. Beaudet

Date: January 31, 2023

Time: 2:00 p.m.

Dept.: 50

Action Filed: March 2, 2022

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1 **TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE THAT** on January 31, 2023, at 2:00 p.m.,¹ or as soon
3 thereafter as counsel may be heard, in Department 50 of the above-captioned Court,
4 located at 111 North Hill Street, Los Angeles, CA 90012, Defendant ASHLEY GORE
5 a/k/a ILLMA GORE (“GORE”) will, and hereby does, move this Court for a Special Motion
6 to Strike (“Anti-SLAPP Motion”) the following portions of the Complaint filed against her
7 by Plaintiff BRIAN WARNER, p/k/a MARILYN MANSON (“PLAINTIFF”) pursuant to Code
8 of Civil Procedure section 425.16:

- 9 • Paragraph 1, lines 4 through 6, (“to publicly cast” through “career.”);
- 10 • Paragraph 3, lines 16 through 17 (“spearheaded” through “and abuse.”);
- 11 • Paragraph 4, lines 1 through 5 and lines 9 through 13 (“To that end”
12 through “conspiracy is staggering,” and “they provided” to “assault of a
13 minor.”);
- 14 • Paragraph 5, lines 19-20 (“and to the false” through “against him.”);
- 15 • Paragraph 16, lines 9-10 (“Around this time” through “abuse.”);
- 16 • Paragraphs 21 through 31;
- 17 • Paragraphs 56 through 61 (Section F of the Factual Allegations);
- 18 • Paragraphs 63 (d) and 63(e) of the First Cause of Action;
- 19 • Paragraphs 68 through 75 (the Second Cause of Action);
- 20 • Attachment B; and
- 21 • Attachment C.

22 Defendant Gore moves to strike all references to relief sought against Gore based
23 on the allegations and claims that arise from the portions of the Complaint identified
24 above. Defendant Gore moves to strike the identified portions of the Complaint and the
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26 _____
27 ¹ Defendant Gore was unable to set this motion for hearing on December 13, 2022, the
28 date on which Defendant Evan Rachel Wood's anti-SLAPP motion is scheduled for
hearing. Defendant Gore respectfully requests that the hearings on the motions be
consolidated if possible.

1 requested relief with prejudice and without leave to amend pursuant to Section 425.16 of
2 the California Code of Civil Procedure.

3 This Anti-SLAPP Motion is made upon the grounds that Plaintiff Brian Warner's,
4 p/k/a Marilyn Manson's allegations against Defendant Gore in the Complaint constitute a
5 Strategic Lawsuit Against Public Participation ("SLAPP") that arises from Defendant
6 Gore's exercise of free speech and petition regarding a matter of public interest, for which
7 Plaintiff cannot demonstrate a probability of prevailing on the merits. The conduct about
8 which Plaintiff complains arises from Defendant Gore's participation in advocacy for
9 legislation and public awareness of domestic and sexual violence, communications with
10 Warner's accusers in connection with the documentary film *Phoenix Rising*, and
11 cooperation with ongoing law enforcement investigations, all of which constitute protected
12 activity.

13 PLEASE TAKE FURTHER NOTICE that Defendant Gore intends to seek the
14 recovery of attorneys' fees and costs as a prevailing party pursuant to Section 425.16(c)
15 of the California Code of Civil Procedure.

16 This Motion is based on this Notice of Motion, the attached Memorandum of Points
17 and Authorities, the Declaration of Margaret A. Ziemianek filed concurrently herewith, the
18 Request for Judicial Notice concurrently filed herewith, all of the pleadings, files, and
19 records in this proceeding, including the Declaration of Evan Rachel Wood In Support of
20 Motion to Strike Portions of Plaintiff's Complaint Pursuant to Code of Civil Procedure
21 425.16 and For Attorneys' Fees, all other matters of which the Court may take judicial
22 notice, and any argument or evidence that may be presented to or considered by the
23 Court prior to its ruling.

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DATED: May 24, 2022

HANSON BRIDGETT LLP

By: 

LAWRENCE M. CIRELLI
MARGARET A. ZIEMIANEK
G. THOMAS RIVERA III
Attorneys for Defendant
ASHLEY GORE a/k/a ILLMA GORE



Court Reservation Receipt

Reservation	
Reservation ID: 662859254881	Status: RESERVED
Reservation Type: Special Motion to Strike under CCP Section 425.16 (Anti-SLAPP motion)	Number of Motions: 1
Case Number: 22STCV07568	Case Title: BRIAN WARNER, P/K/A MARILYN MANSON vs EVAN RACHEL WOOD, et al.
Filing Party: Ashley Gore (Defendant)	Location: Stanley Mosk Courthouse - Department 50
Date/Time: January 31st 2023, 2:00PM	Confirmation Code: CR-XXMESPTFWHLMHKNUB

Fees			
Description	Fee	Qty	Amount
First Paper Fees (Unlimited Civil)	435.00	1	435.00
Credit Card Percentage Fee (2.75%)	11.96	1	11.96
TOTAL			\$446.96

Payment	
Amount: \$446.96	Type: MasterCard
Account Number: XXXX3114	Authorization: 085310

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