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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF LOS ANGELES, CENTRAL DISTRICT
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11 BRIAN WARNER, p/k/a MARILYN
MANSON,

12 Plaintiff,

13 vs.
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15 EVAN RACHEL WOOD; ASHLEY GORE,
a/k/a ILLMA GORE,

16 Defendants.
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CASE NO. 22STCV07568

**PLAINTIFF BRIAN WARNER’S NOTICE
OF INTENT TO RESPOND TO
DEFENDANTS’ 190 EVIDENTIARY
OBJECTIONS AND OBJECT TO
IMPROPER REPLY DECLARATIONS
AT THE DECEMBER 1, 2022 HEARING**

The Hon. Teresa A. Beaudet

Date: December 1, 2022

Time: 10:00 a.m.

Dept: 50

Action Filed: March 2, 2022

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20 Two days before Thanksgiving, Defendants filed **190 evidentiary objections** to virtually
21 every paragraph of every declaration and every piece of evidence submitted with Plaintiff’s
22 oppositions to Defendants’ anti-SLAPP motions—including objections the Court has already
23 overruled. And nearly every one of Defendants’ “objections” has four or more purported bases.
24 Written responses would compound what already “constitute[s] oppression of the opposing party
25 and an imposition on the resources of the court” just days before the motion hearing. *Cole v.*
26 *Town of Los Gatos*, 205 Cal. App. 4th 749, 764 (2012). Unless the Court would prefer written
27 responses, Plaintiff hereby gives notice that he intends to respond to Defendants’ objections at the
28 December 1 hearing on their motions. Plaintiff understands that a court reporter will be present.

1 Further notice is given that, at the December 1 hearing, Plaintiff intends to object to two
2 declarations submitted by Gore with her reply (Declarations of Paul Zeniewicz and Ashley Gore),
3 given that Gore submitted **no** evidence with her moving papers. *See Jay v. Mahaffey*, 218 Cal.
4 App. 4th 1522, 1537 (2013) (affirming lower court decision to exclude new evidence submitted
5 with anti-SLAPP reply brief where “Defendants’ decision to wait until the reply briefs to bring
6 forth any evidence at all, when the [Plaintiffs] would have no opportunity to respond, was simply
7 unfair.”).

8 DATED: November 29, 2022 Respectfully submitted,

9 KING, HOLMES, PATERNO & SORIANO, LLP

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By: /s/ Howard E. King

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HOWARD E. KING

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PROOF OF SERVICE

**Brian Warner p/k/a Marilyn Manson v. Evelyn Rachel Wood, et al.
Case No. 22STCV07568**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 1900 Avenue of the Stars, Twenty-Fifth Floor, Los Angeles, CA 90067-4506.

On November 29, 2022, I served true copies of the following document(s) described as **PLAINTIFF BRIAN WARNER’S NOTICE OF INTENT TO RESPOND TO DEFENDANTS’ 190 EVIDENTIARY OBJECTIONS AND OBJECT TO IMPROPER REPLY DECLARATIONS AT THE DECEMBER 1, 2022 HEARING** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address Eweinberger@khpslaw.com to the persons at the e-mail addresses listed in the Service List.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on November 29, 2022, at Los Angeles, California.

/s/ Eniko Weinberger

Eniko Weinberger

1 **SERVICE LIST**
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3 **Case No. 22STCV07568**

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