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

11 BRIAN WARNER, p/k/a MARILYN
 12 MANSON,
 13 Plaintiff,
 14 vs.
 15 EVAN RACHEL WOOD; ASHLEY GORE,
 a/k/a ILLMA GORE,
 16 Defendants.

Case No. 22STCV07568
 Assigned to Hon. Teresa A. Beaudet, Dept. 50

**DEFENDANT EVAN RACHEL WOOD'S
 EVIDENTIARY OBJECTIONS IN
 SUPPORT OF SPECIAL MOTION TO
 STRIKE**

*[Notice of Lodging, Reply Brief, Proposed
 Order re Evidentiary Objections, and
 Response to Plaintiff's Evidentiary Objections
 filed concurrently herewith]*

Date: December 1, 2022
 Time: 10:00 a.m.
 Dept.: 50

Action Filed: March 2, 2022
 Trial Date: None Set

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EVIDENTIARY OBJECTIONS

Defendant Evan Rachel Wood (“Defendant”) hereby objects to the following evidence submitted by Plaintiff Brian Warner, p/k/a Marilyn Manson (“Plaintiff”) in support of his Opposition to the Special Motion to Strike of Defendant on the grounds set forth below:

Objections to Emese Balog Declaration

No.	Material Objected to:	Grounds for Objection:	Ruling on the Objection
1.	“Walter’s description of my time with Manson and Walters in Vienna is false.” (Balog Decl., ¶ 7.)	Irrelevant (Evid. Code § 350) Lacks Foundation (Evid. Code § 403) (regarding whether Walters was referencing Balog, whether Walters witnessed Warner’s degradation of female fans, and whether Warner bragged about having sex and taking the virginity of a young girl) Hearsay (Evid. Code § 1200, et seq.)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
2.	“Not only had my story been taken and misrepresented by Walters without my knowledge or consent, but also I was being recruited by Gore, as a supposed victim of Warner...” (Balog Decl., ¶ 8.)	Lacks Foundation (Evid. Code § 403) (as to what Walters witnessed and who she was referencing). Hearsay (Evid. Code § 1200, et seq.) Improper Lay Opinion (Evid. Code § 800) (as to Gore’s state of mind). The Court previously sustained Defendant Ashley Gore’s evidentiary objections as to this same material.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Objections to Blair Berk Declaration

No.	Material Objected to:	Grounds for Objection:	Ruling on the Objection
3.	On or around November 2021, I became aware of a letter purportedly written and signed by an “Agent Michelle Langer” of the Federal Bureau of Investigation (“FBI”) concerning a purported federal criminal investigation into	Lacks Foundation (Evid. Code § 403) Lack of Authentication/ Secondary Evidence Rule/ Document Speaks for Itself (Evid. Code §§, 1401, 1521, 1523)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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	Warner, and a supposed threat to the safety of Evan Rachel Wood and others. A true and correct copy of that letter is attached as Exhibit A . (Berk Decl., ¶ 2.)		
4.	Berk Decl., Ex. A.	Improper Authentication and Lacks Foundation (Evid. Code §§ 403, 1400-1401) Lack of Personal Knowledge (Evid. Code § 702) Hearsay (Evid. Code § 1200, et seq.)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
5.	I had immediate concerns about the authenticity of the letter based on my nearly 30 years of experience practicing federal and state criminal law because the letter, purportedly written on behalf of a federal law enforcement agency, was not printed on official letterhead; the correspondence stated the author was from the “Federal Violent Crimes Department,” a “Department” I had no knowledge of and quickly determined did not exist; the correspondence was not addressed to a specific person, had handwritten contact names on it, and also contained glaring typographical errors. (Berk Decl., ¶ 3.)	Irrelevant (Evid. Code § 350) Improper Lay Opinion (Evid. Code § 800) (as to authenticity of letter) Improper Legal Opinion (Evid. Code §§ 800-801) Improper Expert Opinion (Evid. Code § 803) (as to authenticity of letter) Lacks Foundation (Evid. Code § 403) Hearsay (Evid. Code § 1200, et seq.) Lack of Authentication/ Secondary Evidence Rule/ Document Speaks for Itself (Evid. Code §§, 1401, 1521, 1523)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
6.	Contemporaneously, my office called the telephone number attached to Agent Langer’s name on the letter. A women named Michele Meyer answered the phone. Meyer told my office she was not a federal agent, and was not Michelle Langer, but was instead an acquaintance of Mr. Warner. (Berk Decl., ¶ 4.)	Lacks Foundation (Evid. Code § 403) Lacks Personal Knowledge (Evid Code § 702) Hearsay (Evid. Code § 1200, et seq.)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
7.	Agent Langer told me that she believed the letter was likely a	Hearsay (Evid. Code § 1200, et seq.)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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	<p>fraud based on my description of the letter. (Berk Decl., ¶ 5.)</p>	<p>Lacks Foundation (Evid. Code § 403)</p> <p>The Court previously sustained Defendant Ashley Gore’s evidentiary objections as to this same material.</p>	
8.	<p>Agent Langer said she recognized the name, but had never investigated Mr. Warner or any matter related to Mr. Warner. Agent Langer also stated that she had not ever investigated any matter related to Evan Rachel Wood. After receiving and reviewing the letter, Agent Langer confirmed to me that (1) she did not write the letter, (2) she never authorized the contents of the letter; (3) she never authorized any use of her name on the letter; and (4) there is no “Federal Violent Crimes Department” at or associated with the FBI. (Berk Decl., ¶ 5.)</p>	<p>Hearsay (Evid. Code § 1200, et seq.)</p> <p>Lacks Foundation (Evid. Code § 403)</p> <p>Lacks Personal Knowledge (Evid Code § 702)</p> <p>The Court previously sustained Defendant Ashley Gore’s evidentiary objections as to this same material.</p>	<p><input type="checkbox"/> Sustained <input type="checkbox"/> Overruled</p>
9.	<p>Agent Langer stated the name sounded familiar and that she believed that Gore had previously contacted Agent Langer to report a crime unrelated to Mr. Warner. (Berk Decl., ¶ 6.)</p>	<p>Irrelevant (Evid. Code § 350)</p> <p>Hearsay (Evid. Code § 1200, et seq.)</p> <p>Lacks Foundation (Evid. Code § 403)</p> <p>The Court previously sustained Defendant Ashley Gore’s evidentiary objections as to this same material.</p>	<p><input type="checkbox"/> Sustained <input type="checkbox"/> Overruled</p>
10.	<p>During this call, Agent Langer also confirmed that there was in fact no active criminal investigation of Mr. Warner being conducted by the FBI. Discussing the letter again, Agent Langer stated that she had a suspicion of how her name had been wrongfully used: Two individuals, Mitch Emerson and Kelly Blauschild, had previously contacted her office to report a crime unrelated to Mr. Warner. (Berk Decl., ¶ 7.)</p>	<p>Irrelevant (Evid. Code § 350)</p> <p>Hearsay (Evid. Code § 1200, et seq.)</p> <p>Lacks Foundation (Evid. Code § 403)</p> <p>Lacks Personal Knowledge (Evid Code § 702)</p> <p>The Court previously sustained Defendant Ashley Gore’s evidentiary objections as to this same material.</p>	<p><input type="checkbox"/> Sustained <input type="checkbox"/> Overruled</p>

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11.	<p>Like Gore, Emerson and Blauschild are involved with the Phoenix Act. Emerson is listed on LinkedIn as the Executive Director of the Phoenix Act, and has posted to Twitter that he works with the Phoenix Act. A true and correct copy of those webpages are attached as Exhibit B. A “Kelly Blaus” believed to be Blauschild is also listed on LinkedIn as the Communications Liason of the Phoenix Act, and has posted to Twitter that she works with the Phoenix Act; another webpage at https://www.kellyblaus.com/vision, states that “My name is Kelly Blauschild I have worked . . . with an organization called the Phoenix Act.” A true and correct copy of those webpages are attached as Exhibit C. (Berk Decl., ¶ 8)</p>	<p>Irrelevant (Evid. Code § 350) Hearsay (Evid. Code § 1200, et seq.) Lacks Foundation (Evid. Code § 403) Lack of Personal Knowledge (Evid Code § 702) The Court previously sustained Defendant Ashley Gore’s evidentiary objections as to this same material.</p>	<p><input type="checkbox"/> Sustained <input type="checkbox"/> Overruled</p>
12.	<p>Berk Decl., Ex. B.</p>	<p>Irrelevant (Evid. Code § 350) Hearsay (Evid. Code § 1200, et seq.) Improper Authentication and Lacks Foundation (Evid. Code §§ 403, 1400-1401)</p>	<p><input type="checkbox"/> Sustained <input type="checkbox"/> Overruled</p>
13.	<p>Berk Decl., Ex. C.</p>	<p>Irrelevant (Evid. Code § 350) Hearsay (Evid. Code § 1200, et seq.) Improper Authentication and Lacks Foundation (Evid. Code §§ 403, 1400-1401)</p>	<p><input type="checkbox"/> Sustained <input type="checkbox"/> Overruled</p>
14.	<p>I understood from my conversations with Agent Langer that, at that time, she was not authorized to prepare a declaration in a civil action stating the above facts because of the ongoing investigation of the letter by her office and the US Attorney’s Office. (Berk Decl., ¶ 9)</p>	<p>Irrelevant (Evid. Code § 350) Hearsay (Evid. Code § 1200, et seq.) Lacks Foundation (Evid. Code § 403)</p>	<p><input type="checkbox"/> Sustained <input type="checkbox"/> Overruled</p>

Objections to Bryton Gore Declaration

No.	Material Objected to:	Grounds for Objection:	Ruling on the Objection
15.	During this call, Wood said there was “something wrong” with the “FBI letter” and that she needed Illma to send her a copy. (B. Gore Decl., ¶ 6.)	Irrelevant (Evid. Code § 350) Hearsay (Evid. Code § 1200, et seq.) Lacks Foundation (Evid. Code § 403) The Court previously sustained Defendant Ashley Gore’s evidentiary objections as to this same material.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
16.	In or around April to May 2021 ... I witnessed Illma use the Procreate application (a graphics editing tool I was familiar with) to transfer a signature from one document onto what appeared to be a letter from a federal law enforcement agent.” (B. Gore Decl., ¶ 6)	Irrelevant (Evid. Code § 350) (the FBI Letter was filed in the parentage action at the beginning of March 2021, so whatever Bryton Gore purportedly saw months later, in April or May 2021, is irrelevant) Lacks Foundation (Evid. Code § 403) (no foundation for the statement that it “appeared to be a letter from a federal law enforcement agent”)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
17.	She said letter was from the Federal Bureau of Investigation, and it was “OK” because, she said, “I know the agent” and “have her number.” (B. Gore Decl., ¶ 6.)	Irrelevant (Evid. Code § 350) Hearsay (Evid. Code § 1200, et seq.) Lacks Foundation (Evid. Code § 403) The Court previously sustained Defendant Ashley Gore’s evidentiary objections as to this same material.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
18.	Illma gave me the iPad and told me it was a gift for me and my daughters. (B. Gore Decl., ¶ 9.)	Irrelevant (Evid. Code § 350) Hearsay (Evid. Code § 1200, et seq.)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
19.	When Illma left, there was no doubt in my mind that the broken iPad belonged to me. (B. Gore Decl., ¶ 10.)	Irrelevant (Evid. Code § 350) Improper Lay Opinion (Evid. Code § 800) (as to ownership of iPad) Inadmissible Legal Conclusion (Evid. Code §§ 310, 800 et seq.)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
20.	Among other things, I saw emails and draft emails that were purportedly written and/or sent by me, which I never drafted,	Irrelevant (Evid. Code § 350) More prejudicial than probative (Evid. Code § 352)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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	authorized, or sent; and social media posts and draft posts purportedly written by me which I never drafted, authorized, or posted. (B. Gore Decl., ¶ 12.)	Lacks Foundation (Evid. Code § 403) Lack of Authentication / Secondary Evidence Rule (Evid. Code §§, 1401, 1521, 1523)	
21.	One item I saw on the broken iPad was a screenshot of a text conversation on the Signal app between Wood and Illma. A true and correct copy of that screenshot is attached as Exhibit A . The screenshot was dated December 20, 2020. The conversation, dated “Sunday, Nov 22”—November 22 fell on a Sunday in 2020—was between someone named “Alabama,” on one hand, and someone who said that “424-489-1211 is my new number,” on the other hand. (B. Gore Decl., ¶ 13.)	Irrelevant (Evid. Code § 350) Lacks Foundation (Evid. Code § 403) Lack of Personal Knowledge (Evid. Code § 702) Lack of Authentication / Document Speaks for Itself / Secondary Evidence Rule (Evid. Code §§ 1400-1401, 1523) Hearsay (Evid. Code § 1200, et seq.)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
22.	B. Gore Decl., Ex. A.	Irrelevant (Evid. Code § 350) Hearsay (Evid. Code § 1200, et seq.) Improper Authentication and Lacks Foundation (Evid. Code §§ 403, 1400-1401) Lack of Personal Knowledge (Evid. Code § 702)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
23.	As described further below, I understand that “Alabama” is Wood because Illma told me she referred to Wood as Alabama and I witnessed and took part in conversations over the Signal app in which Wood used the nickname Alabama. (B. Gore Decl., ¶ 13.)	Irrelevant (Evid. Code § 350) Lacks Foundation (Evid. Code § 403) Lack of Personal Knowledge (Evid. Code § 702) Hearsay (Evid. Code § 1200, et seq.)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
24.	In this conversation, Wood stated: “Here is the letter To Whom it May Concern:	Lack of Authentication / Document Speaks for Itself (Evid. Code §§ 1400-1401) Hearsay (Evid. Code § 1200, et seq.)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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	<p>Please be advised that Ms. Evan Rachel Wood is one of the primary witnesses in connection with an impending criminal prosecution in Los Angeles involving an international and well known public figure. We have advised Ms. Wood that in our opinion it is in her and her family’s best interest to not be in Los Angeles at the time of this individual’s arrest and the criminal proceedings. The safety of Ms. Wood, her son, Jack as well as the other victims and their families are of utmost concern during this time.</p> <p>Whatchu think?” (B. Gore Decl., ¶ 14.)</p>	<p>Lacks Foundation (Evid. Code § 403)</p> <p>Lack of Personal Knowledge (Evid. Code § 702)</p>	
25.	<p>Illma responded, “It’s good[.] I don’t know about the letter stating th[e] arrest before it happens[.]” (B. Gore Decl., ¶ 15.)</p>	<p>Lack of Authentication / Document Speaks for Itself (Evid. Code §§ 1400-1401)</p> <p>Hearsay (Evid. Code § 1200, et seq.)</p> <p>Lacks Foundation (Evid. Code § 403)</p> <p>Lack of Personal Knowledge (Evid. Code § 702)</p>	<p><input type="checkbox"/> Sustained <input type="checkbox"/> Overruled</p>
26.	<p>Another item I saw on the broken iPad was an image of a undated letter purportedly written and signed by “Michelle Langer” of the “Federal Violent Crimes Department.” A true and correct copy of that screenshot is attached as Exhibit B. (B. Gore Decl., ¶ 16.)</p>	<p>Lacks Foundation (Evid. Code § 403)</p> <p>Lack of Personal Knowledge (Evid. Code § 702)</p> <p>Lack of Authentication / Document Speaks for Itself (Evid. Code §§ 1400-1401)</p>	<p><input type="checkbox"/> Sustained <input type="checkbox"/> Overruled</p>
27.	<p>B. Gore Decl., Ex. B.</p>	<p>Irrelevant (Evid. Code § 350)</p> <p>Hearsay (Evid. Code § 1200, et seq.)</p> <p>Lacks Foundation (Evid. Code § 403)</p> <p>Lack of Authentication (Evid. Code § 1401)</p>	<p><input type="checkbox"/> Sustained <input type="checkbox"/> Overruled</p>

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28.	<p>This letter stated: “To Whom it May Concern,</p> <p>Please be advised that Ms. Evan Rachel Wood is a key witness in connection to a criminal investigation in Los Angeles, California involving an international and well known public figure. The safety of Ms. Wood, her family, other victims, and of their families are of the utmost concern during this time.</p> <p>Contact for more information regarding the safety of victims of Human and Sex Trafficking crimes.” (B. Gore Decl., ¶ 17.)</p>	<p>Lack of Authentication / Document Speaks for Itself (Evid. Code §§ 1400-1401)</p> <p>Hearsay (Evid. Code § 1200, et seq.)</p> <p>Lacks Foundation (Evid. Code § 403)</p> <p>Lack of Personal Knowledge (Evid. Code § 702)</p>	<p><input type="checkbox"/> Sustained <input type="checkbox"/> Overruled</p>
29.	<p>This letter looked very similar to the one I witnessed Illma work on in or around April to May 2021, when I saw her transfer a signature from one document to another, and send the finished letter to Wood. (B. Gore Decl., ¶ 18.)</p>	<p>Irrelevant (Evid. Code § 350) (the FBI Letter was filed in the parentage action at the beginning of March 2021, so whatever Bryton Gore purportedly saw months later, in April or May 2021, is irrelevant)</p> <p>Lacks Foundation (Evid. Code § 403)</p> <p>Lack of Personal Knowledge (Evid. Code § 702)</p> <p>Improper Lay Opinion (Evid. Code § 800) (as to similarity between letters)</p>	<p><input type="checkbox"/> Sustained <input type="checkbox"/> Overruled</p>
30.	<p>Another item I saw on the broken iPad was a image of a document titled “Federal Bureau of Investigation Receipt for Property” dated December 18, 2020. A true and correct copy of that screenshot is attached as Exhibit C. At the bottom of the document, next to “Received From” is Illma’s name and a signature, and next to “Received By” is the name “Elizabeth Farrell” and a signature. (B. Gore Decl., ¶ 19.)</p>	<p>Lacks Foundation (Evid. Code § 403)</p> <p>Lack of Personal Knowledge (Evid. Code § 702)</p> <p>Lack of Authentication / Document Speaks for Itself (Evid. Code §§ 1400-1401)</p>	<p><input type="checkbox"/> Sustained <input type="checkbox"/> Overruled</p>

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31.	B. Gore Decl., Ex. C.	<p>Irrelevant (Evid. Code § 350)</p> <p>Hearsay (Evid. Code § 1200, et seq.)</p> <p>Lacks Foundation (Evid. Code § 403)</p> <p>Lack of Authentication (Evid. Code §§ 1400-1401)</p>	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
32.	<p>This appeared to be the same document—and the same signature for Farrell—that I saw Illma use in or around April to May 2021 to alter the letter she sent to Wood. This image also reminded me of a conversation I had with Illma in approximately December 2020, in which she told me she was investigating Warner; the FBI was involved; the “investigation” was getting “serious”; and, accordingly, she expected to be very busy. (B. Gore Decl., ¶ 19.)</p>	<p>Improper Lay Opinion (Evid. Code § 800) (as to similarity of letter and signature)</p> <p>Lacks Foundation (Evid. Code § 403)</p> <p>Lack of Personal Knowledge (Evid. Code § 702)</p> <p>Hearsay (Evid. Code § 1200, et seq.)</p> <p>Uncertain, unintelligible, and irrelevant. (Evid. Code §§ 210, 350, 352)</p>	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
33.	<p>Another thing I saw on the broken iPad were at least two images of a checklist. One checklist was blank, and others were filled in. A true and correct copy of two such images are attached as Exhibit D. (B. Gore Decl., ¶ 20.)</p>	<p>Irrelevant (Evid. Code § 350)</p> <p>Lacks Foundation (Evid. Code § 403)</p> <p>Lack of Authentication / Document Speaks for Itself (Evid. Code §§ 1400-1401)</p>	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
34.	B. Gore Decl., Ex. D.	<p>Irrelevant (Evid. Code § 350)</p> <p>Hearsay (Evid. Code § 1200, et seq.)</p> <p>Lacks Foundation (Evid. Code § 403)</p> <p>Lack of Authentication (Evid. Code §§ 1400-1401)</p>	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
35.	<p>Another series of items I saw on the broken iPad were pictures of emails and text messages from Ashley Walters that contained email addresses, social media logins, passwords, addresses, social security numbers, and other personal information about Warner. (B. Gore Decl., ¶ 21.)</p>	<p>Irrelevant (Evid. Code § 350)</p> <p>Hearsay (Evid. Code § 1200, et seq.)</p> <p>Lacks Foundation (Evid. Code § 403)</p> <p>Secondary Evidence Rule (Evid. Code § 1523)</p>	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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36.	One item I saw in these discarded materials was a piece of paper covered with what appeared to be my sister Illma’s handwriting, which I recognized. A true and correct copy of that document is attached as Exhibit E. (B. Gore Decl., ¶ 22.)	Irrelevant (Evid. Code § 350) Lacks Foundation (Evid. Code § 403) Lack of Authentication / Document Speaks for Itself (Evid. Code §§ 1400-1401)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
37.	B. Gore Decl., Ex. E.	Irrelevant (Evid. Code § 350) Hearsay (Evid. Code § 1200, et seq.) Lacks Foundation (Evid. Code § 403) Lack of Authentication (Evid. Code §§ 1400-1401)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
38.	Another item I saw in these discarded materials was a notebook filled with what appeared to be my sister Illma’s handwriting, which I recognized. A true and correct copy of one page from that notebook is attached as Exhibit F. (B. Gore Decl., ¶ 23.)	Irrelevant (Evid. Code § 350) Lacks Foundation (Evid. Code § 403) Lack of Personal Knowledge (Evid. Code § 702) Lack of Authentication/ Secondary Evidence Rule/ Document Speaks for Itself (Evid. Code §§, 1401, 1521, 1523)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
39.	B. Gore Decl., Ex. F.	Irrelevant (Evid. Code § 350) Hearsay (Evid. Code § 1200, et seq.) Lacks Foundation (Evid. Code § 403) Lack of Authentication (Evid. Code §§ 1400-1401)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
40.	I recognized her voice and she identified herself as Wood. Wood wanted to discuss what had happened while Illma was living at our house. According to Wood, Gore said I had died three months prior. I said I was not dead. (B. Gore Decl., ¶ 24.)	Irrelevant (Evid. Code § 350) Hearsay (Evid. Code § 1200, et seq.) Lacks Foundation (Evid. Code § 403)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
41.	I told Wood that I had seen a letter supposedly written about her by an FBI agent, and earlier that year, I witnessed Illma doctor the same or a similar letter—in other	Irrelevant (Evid. Code § 350) (the FBI Letter was filed in the custody dispute at the beginning of March 2021, so whatever Bryton Gore purportedly saw months later, in	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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	<p>words, that I knew the letter was a fake. Wood’s response shocked me. She said the letter was so important to her work against Warner, and told me to “think of what would happen” to her and the “victims” if this ever got out to the media. I offered to send Wood or her attorneys these materials but she declined. (B. Gore Decl., ¶ 24.)</p>	<p>April or May 2021, is irrelevant)</p> <p>Hearsay (Evid. Code § 1200, et seq.)</p> <p>Improper Lay Opinion /Improper Legal Conclusion (Evid. Code §§ 310, 800) (as to whether letter was “doctor[ed]” and a “fake”)</p> <p>Lacks Foundation (Evid. Code § 403) (regarding the authenticity of the letter, what “letter” she was talking about, what “letter” Wood was talking about, or how it was purportedly important to her work)</p> <p>Prejudice Outweighs Probative Value (Evid. Code § 352)</p>
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Objections to Howard E. King Declaration

No.	Material Objected to:	Grounds for Objection:	Ruling on the Objection
42.	King Decl., Ex. B	<p>Irrelevant (Evid. Code § 350)</p> <p>Hearsay (Evid. Code § 1200, et seq.)</p> <p>Lacks Foundation (Evid. Code § 403)</p> <p>Lack of Authentication (Evid. Code §§ 1400-1401)</p>	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
43.	King Decl., Ex. C	<p>Irrelevant (Evid. Code § 350)</p> <p>Hearsay (Evid. Code § 1200, et seq.)</p> <p>Lacks Foundation (Evid. Code § 403)</p> <p>Lack of Authentication (Evid. Code §§ 1400-1401)</p>	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
44.	King Decl., Ex. D	<p>Irrelevant (Evid. Code § 350)</p> <p>Hearsay (Evid. Code § 1200, et seq.)</p> <p>Lacks Foundation (Evid. Code § 403)</p> <p>Lack of Authentication (Evid. Code §§ 1400-1401)</p>	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Objections to Supplemental Howard E. King Declaration

No.	Material Objected to:	Grounds for Objection:	Ruling on the Objection
45.	Further attached hereto are a number of documents found on the iPad described in the Declaration of Bryton Gore and the Declaration of Michael Kunkel: (Supp. King Decl., ¶ 8.)	Hearsay (Evid. Code § 1200, et seq.) Lacks Foundation (Evid. Code § 403) Lacks Personal Knowledge (Evid Code § 702) Lack of Authentication (Evid. Code §§ 1400-1401)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
46.	Supp. King Decl. Ex. G.	Irrelevant (Evid. Code § 350) (post-dates the filing of the Complaint)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
47.	Supp. King Decl. Ex. I.	Irrelevant (Evid. Code § 350) Lacks Foundation (Evid. Code § 403) (the testimony regarding this document is extremely limited)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
48.	Supp. King Decl., Ex. J	Hearsay (Evid. Code § 1200, et seq.) Lacks Foundation (Evid. Code § 403) Lacks Personal Knowledge (Evid Code § 702) Lack of Authentication (Evid. Code §§ 1400-1401)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
49.	Supp. King Decl., Exs. K, L, M, and N.	Hearsay (Evid. Code § 1200, et seq.) Lacks Foundation (Evid. Code § 403) Lacks Personal Knowledge (Evid Code § 702) Lack of Authentication (Evid. Code §§ 1400-1401) Irrelevant (Evid. Code § 350)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
50.	Supp. King Decl., Exs. O and P.	Hearsay (Evid. Code § 1200, et seq.) Lacks Foundation (Evid. Code § 403) Lacks Personal Knowledge (Evid Code § 702)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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		Lack of Authentication (Evid. Code §§ 1400-1401) Irrelevant (Evid. Code § 350)	
51.	Supp. King Decl., Ex. Q.	Hearsay (Evid. Code § 1200, et seq.) Lacks Foundation (Evid. Code § 403) Lacks Personal Knowledge (Evid Code § 702) Lack of Authentication (Evid. Code §§ 1400-1401) Irrelevant (Evid. Code § 350)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
52.	Supp. King Decl., Exs. R and S.	Hearsay (Evid. Code § 1200, et seq.) Lacks Foundation (Evid. Code § 403) Lacks Personal Knowledge (Evid Code § 702) Lack of Authentication (Evid. Code §§ 1400-1401) Irrelevant (Evid. Code § 350) Incomplete on its face (Evid. Code § 356)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
53.	Supp. King Decl., Ex. T.	Hearsay (Evid. Code § 1200, et seq.) Lacks Foundation (Evid. Code § 403) Lacks Personal Knowledge (Evid Code § 702) Lack of Authentication (Evid. Code §§ 1400-1401) Irrelevant (Evid. Code § 350)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
54.	Supp. King Decl., Ex. U.	Hearsay (Evid. Code § 1200, et seq.) Lacks Foundation (Evid. Code § 403)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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		Lacks Personal Knowledge (Evid Code § 702) Lack of Authentication (Evid. Code §§ 1400-1401) Irrelevant (Evid. Code § 350)	
55.	King Supp. Decl., Ex. V (a true and correct copy of frames from the credit sequence of Warner’s 1998 film “Dead to the World.”)	Hearsay (Evid. Code § 1200, et seq.) Lacks Foundation (Evid. Code § 403) Lacks Personal Knowledge (Evid Code § 702) Lack of Authentication (Evid. Code §§ 1400-1401) Irrelevant (Evid. Code § 350) (Warner testified that “McGaffigan, Polard, and Duffy appeared in my tour documentary ‘Dead to the World’ and have been credited as ‘cast’ of that film on the website IMDb.” Warner Decl. ¶ 6.)	
56.	Four additional documents attached hereto were also found on the iPad described in the Declaration of Bryton Gore and the Declaration of Michael Kunkel: (King Supp. Decl., ¶ 9.)	Hearsay (Evid. Code § 1200, et seq.) Lacks Foundation (Evid. Code § 403) Lacks Personal Knowledge (Evid Code § 702) Lack of Authentication (Evid. Code §§ 1400-1401)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
57.	King Supp. Decl., Exs. W-Z	Hearsay (Evid. Code § 1200, et seq.) Lacks Foundation (Evid. Code § 403) Lacks Personal Knowledge (Evid Code § 702) Lack of Authentication (Evid. Code §§ 1400-1401) Irrelevant (Evid. Code § 350)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Objections to Brian Warner Declaration

No.	Material Objected to:	Grounds for Objection:	Ruling on the Objection
58.	I never abused, assaulted, raped, or threatened Wood or her family as she has since contended. <i>See, e.g.,</i> Wood Decl. ¶¶ 6-7, 9, 12, 15, 23. (Warner Decl., ¶ 2.)	Improper Lay Opinion (Evid. Code § 800) (as to Wood’s state of mind and whether Plaintiff’s conduct legally constituted abuse, assault, rape, or threats). Inadmissible because it contains argument and is based on opinion, not fact (<i>See</i> 2B Cal.Jur.3d (2022 Affidavits and Declarations § 18 [“declaration is inadmissible [because] it contains argument, conclusions, and hearsay.”]; accord, <i>e.g., Guthrey v. State of California</i> (1998) 63 Cal.App.4th 1108, 1119 [declaration “properly excluded” because it was “based on opinion, not facts”].) ¹	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
59.	Her accusations against me of abuse, assault, rape, threats, and the like are unequivocally false. (Warner Decl., ¶ 2.)	Improper Lay Opinion (Evid. Code § 800) (as to Wood’s state of mind and whether Plaintiff’s conduct legally constituted abuse, assault, rape, or threats). Inadmissible because it contains argument and is based on opinion, not fact (<i>see</i> authority, <i>supra</i> n. 1)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
60.	I understand that on or around February 1, 2021, Wood posted to Instagram that I was her “abuser,” and shortly thereafter a number of other women simultaneously emerged with false public accusations against me of abuse, assault, rape, threats, “trafficking,” and the like. (Warner Decl., ¶ 3.)	Lacks Foundation (Evid. Code § 403) Improper Lay Opinion (Evid. Code § 800) (as to whether Plaintiff’s conduct legally constituted abuse, assault, rape, or threats). Inadmissible because it contains argument and is based on opinion, not fact (<i>see</i> authority, <i>supra</i> n. 1)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
61.	To the extent I had relationships with these women, those relationships were consensual. I	Improper Lay Opinion (Evid. Code § 800) (as to the other accusers’ states of mind, whether there was legal	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

¹ These citations to authority are incorporated into all subsequent objections made on the basis of improper argument.

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	never abused, assaulted, raped, threatened, or “trafficked” any of these women, as they contend. Their accusations against me of abuse, assault, rape, threats, and the like are unequivocally false. (Warner Decl., ¶ 3.)	consent, and whether Plaintiff’s conduct legally constituted abuse, assault, rape, threats or trafficking). Lacks Foundation (Evid. Code § 403) (what specific accusations were made by whom has not been established) Inadmissible because it contains argument and is based on opinion, not fact (<i>see</i> authority, <i>supra</i> n. 1)	
62.	My film “Groupie” was not “child pornography.” It was a professional art/horror film... (Warner Decl., ¶ 5.)	Inadmissible because it contains argument and is based on opinion, not fact (<i>see</i> authority, <i>supra</i> n. 1) Secondary Evidence Rule (Evid. Code § 1523) (“Groupie” is not before the Court and Plaintiff cannot prove it contents through testimony)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
63.	The actress, Pola Weiss, was over 21, and there was no sex in the film. (Warner Decl., ¶ 5.)	Secondary Evidence Rule (Evid. Code § 1523) (“Groupie” is not before the Court and Plaintiff cannot prove it contents—including who appears in it or whether there is sex in the film—through testimony. Notably, Plaintiff’s statement that there was no sex in the film is inconsistent with the statements made about “Groupie” in the “Dinner for Five” interview that “[Plaintiff] sucked Twiggy’s cock on the video” and the actress better not be under 18 or [Plaintiff] is “in trouble!” <i>See</i> Wood Decl. Ex. 3 at 9; Ex. 4 at 1:01:34-1:02:37.)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
64.	I understand that Wood and Gore continue to promulgate the falsehood that I am a child abuser, and that “Groupie” is child pornography, as somehow lending credence to Wood’s false accusations and enhancing their perceived influence with prospective accusers. (Warner Decl., ¶ 6.)	Inadmissible because it contains argument and is based on opinion, not fact (<i>see</i> authority, <i>supra</i> n. 1) Lacks Foundation (Evid. Code § 403) Lack of Personal Knowledge (Evid. Code § 702)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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65.	I understand from documents given to me by McGaffigan comprising conversations between her and Gore, that in September 2020 Gore attempted to recruit McGaffigan for a “group of survivors of violence with similar experiences,” specifically “abuse suffered from other teenagers” allegedly by me. In support of that proposition, Gore stated “Groupie” was “not released because the girl was underage,” the “content . . . horrifies people,” and the “FBI got involved.” (Warner Decl., ¶ 6.)	Irrelevant (Evid. Code § 350) Lacks Foundation (Evid. Code § 403) Lack of Personal Knowledge (Evid. Code § 702) Hearsay (Evid. Code § 1200, et seq.) The Court previously sustained Defendant Ashley Gore’s evidentiary objections as to this same material.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
66.	None of McGaffigan, Polard, or Duffy appeared in “Groupie,” (Warner Decl., ¶ 6.)	Secondary Evidence Rule (Evid. Code § 1523) (“Groupie” is not before the Court and Plaintiff cannot prove it contents—including who does or does not appear in it—through testimony.)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
67.	... and I never abused, or threatened to abuse, McGaffigan, Polard, or Duffy. (Warner Decl., ¶ 6.)	Inadmissible because it contains argument and is based on opinion, not fact (<i>see</i> authority, <i>supra</i> n. 1) Improper Lay Opinion (Evid. Code § 800) (as to McGaffigan, Polard, or Duff’s states of mind and whether Plaintiff’s conduct legally constituted abuse).	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
68.	I understand further that on March 3, 2022, Gore posted to Twitter, calling me a “rapist pedophile,” and on approximately March 15, 2022, Wood appeared on “The Trevor Noah Show,” stating that “there have been allegations and stories that have come out on the internet that involve minors, and you gotta draw the line somewhere, and with children, I have to draw the line there and I don’t believe that he will stop until he is stopped.” ¹	Irrelevant (Evid. Code § 350) (alleged statements post-date the Complaint) Lacks Foundation (Evid. Code § 403) Hearsay (Evid. Code § 1200, et seq.) The Court previously sustained Defendant Ashley Gore’s evidentiary objections as to this same material.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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	(Warner Decl., ¶ 7.)		
69.	I am not a child abuser and have never abused, or threatened to abuse, any child—and I never would. (Warner Decl., ¶ 7.)	Inadmissible because it contains argument and is based on opinion, not fact (<i>see</i> authority, supra n. 1) Improper Lay Opinion (Evid. Code § 800) (whether Plaintiff’s conduct legally constituted child abuse).	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
70.	I have suffered severe emotional distress as a result of Wood’s and Gore’s conduct as alleged in my Complaint. I am not a rapist or abuser, but many people now apparently think that I am. (Warner Decl., ¶ 8.)	Lacks Foundation (Evid. Code § 403) (regarding conduct alleged in Complaint) Lack of Personal Knowledge (Evid. Code §702) (regarding conduct alleged in Complaint) Hearsay (Evid. Code § 1200, et seq.) Improper Lay Opinion and Inadmissible Legal Conclusion (Evid. Code §§ 310, 800 et seq.) (whether Plaintiff’s conduct legally constituted rape or abuse and whether he has suffered severe emotional distress).	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
71.	The individual acts alleged in my Complaint were not isolated events but rather part of an intertwined and long-running conspiracy and course of conduct to cast me publicly—and falsely—as a rapist and abuser. (Warner Decl., ¶ 9.)	Lacks Foundation (Evid. Code § 403) Lack of Personal Knowledge (Evid. Code §702) Improper Lay Opinion and Inadmissible Legal Conclusion (Evid. Code §§ 310, 800 et seq.) Inadmissible because it contains argument and is based on opinion, not fact (<i>see</i> authority, supra n. 1)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
72.	This conduct included not only pressuring and causing women to emerge with coordinated false allegations of rape and abuse, but also other acts used to promulgate and amplify those public falsehoods. (Warner Decl., ¶ 9.)	Lacks Foundation (Evid. Code § 403) Lack of Personal Knowledge (Evid. Code §702) Improper Lay Opinion and Inadmissible Legal Conclusion (Evid. Code §§ 310, 800 et seq.)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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		Inadmissible because it contains argument and is based on opinion, not fact (<i>see</i> authority, <i>supra</i> n. 1)	
73.	For a nearly decade or more, none of these women accused me of rape or abuse as no rape or abuse happened. (Warner Decl., ¶ 9.)	Lacks Foundation (Evid. Code § 403) Lack of Personal Knowledge (Evid. Code §702) Irrelevant (Evid. Code § 350) Improper Lay Opinion and Inadmissible Legal Conclusion (Evid. Code §§ 310, 800 et seq.) Inadmissible because it contains argument and is based on opinion, not fact (<i>see</i> authority, <i>supra</i> n. 1)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
74.	I have been the target of a fake letter purportedly from a real FBI agent whom I understand has told my counsel that she did not draft, sign, or authorize the letter, and had never investigated me, any matter related to me, or any matter related to Wood. (Warner Decl., ¶ 9.)	Lacks Foundation (Evid. Code § 403) Lack of Personal Knowledge (Evid. Code §702) Hearsay (Evid. Code § 1200, et seq.) Improper Lay Opinion (Evid. Code § 800) (as to authenticity of letter) The Court previously sustained Defendant Ashley Gore’s evidentiary objections as to this same material.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
75.	In addition, I have been defamed, impersonated, hacked, and “swatted” by Wood and/or Gore. (Warner Decl., ¶10.)	Lacks Foundation (Evid. Code § 403) Lack of Personal Knowledge (Evid. Code §702) Inadmissible Legal Conclusion (Evid. Code §§ 310, 800 et seq.) Irrelevant (Evid. Code § 350) Inadmissible because it contains argument and is based on opinion, not fact (<i>see</i> authority, <i>supra</i> n. 1)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
76.	After Wood’s and others’ lies about me became public, the media firestorm was exacerbated when Gore falsely reported that there was an “emergency” at my	Irrelevant (Evid. Code § 350) Lacks Foundation (Evid. Code § 403).	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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	home, causing low flying police helicopters, spotlights, squad cars, and armed officers to be deployed to my home for hours, on multiple occasions. (Warner Decl., ¶10.)	Lack of Personal Knowledge (Evid. Code §702) The Court previously sustained Defendant Ashley Gore’s evidentiary objections as to this same material.	
77.	Members of the press appeared to be some of the first on the scene, and this chaos was reported as somehow being connected with the false allegations against me. Photos of my house and my address were published online and in newspapers, and paparazzi and media camped outside for weeks; my wife and I were forced to move out and sell our home. (Warner Decl., ¶10.)	Irrelevant (Evid. Code § 350) Lacks Foundation (Evid. Code § 403) Lack of Personal Knowledge (Evid. Code §702)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Objections to Paula M. Weiss Declaration

No.	Material Objected to:	Grounds for Objection:	Ruling on the Objection
78.	I acted in a film by Manson called “Groupie.” (Weiss Decl., ¶ 4.)	Secondary Evidence Rule (Evid. Code § 1523) (“Groupie” is not before the Court and Plaintiff cannot prove it contents—including who appears in it—through testimony. A genuine dispute exists concerning the contents of the film, including who appears in it.)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
79.	The film would be shot at his house. We agreed that I would play a crazed fan, <i>i.e.</i> , the “groupie,” who found out where Manson lived and was bringing him a piece of art. His bandmates would be at the house when I rang the doorbell. The scene was then to devolve into a scary game of truth-or-dare straight out of a horror film. Only he and I would be in on the plot, and part of the concept was to capture the reactions of his bandmates and other people who were in the house.	Secondary Evidence Rule (Evid. Code § 1523) (“Groupie” is not before the Court and Plaintiff cannot prove it contents—including who appears in it and what happens in the film—through testimony. Moreover, a genuine dispute exists concerning the contents of the film.)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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	(Weiss Decl., ¶ 4.)		
80.	Before, during, and after the film shoot, I knew what I was doing and was totally comfortable with it. I fed on the energy of the shocked crowd and hammed it up for the scene. I felt completely and totally safe during the filming with Manson. I did not feel degraded, humiliated, exploited, or abused. It was acting, make believe. In fact, I felt like I was able to give into the character and further develop my acting skills. I considered this film to be a professional job. It was a paid job (Weiss Decl., ¶ 5.)	Secondary Evidence Rule (Evid. Code § 1523) (“Groupie” is not before the Court and Plaintiff cannot prove it contents—including who appears in it and what happens in the film—through testimony. Moreover, a genuine dispute exists concerning the contents of the film.)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
81.	A short clip of the “Groupie” film I acted in was used in the documentary, and I was thanked in the credits (“Special Thanks . . . Pola Weiss”). (Weiss Decl., ¶ 6.)	Secondary Evidence Rule (Evid. Code § 1523) (Neither “Groupie” nor Dead to the World are before the Court and Plaintiff cannot prove their contents through testimony. A genuine dispute exists concerning the contents of “Groupie,” including who appears in it and what happens.)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
82.	Any statements that I was under the age of 18 at the time ‘Groupie’ was filmed, that ‘Groupie’ depicted or constituted child pornography or abuse, or that I was dead or killed are unequivocally false. (Weiss Decl., ¶ 7.)	Irrelevant (Evid. Code § 350) Improper Lay Opinion (Evid. Code § 800) (as to whether film depicted abuse) Secondary Evidence Rule (Evid. Code § 1523) (“Groupie” is not before the Court and Plaintiff cannot prove it contents—including who appears in it and what happens in the film—through testimony. Moreover, a genuine dispute exists concerning the contents of the film.)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Objections to Michelle Meyer Declaration

No.	Material Objected to:	Grounds for Objection:	Ruling on the Objection
83.	I am also a victim of Ashley Gore a/k/a Illma Gore (“Gore”) and	Lacks Foundation (Evid. Code § 403)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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	Evan Rachel Wood’s (“Wood”) unauthorized and illegal use of my phone number on a forged FBI letter. (Meyer Decl., ¶ 5.)	Lack of Personal Knowledge (Evid. Code § 702) Inadmissible Legal Conclusion (Evid. Code §§ 310, 800 et seq.)	
84.	I am aware that the actress from Groupie, Paula Weiss p/k/a Pola Weiss, has since come forward and publicly stated that she was approximately 21-22 years old at the time of filming, she was a paid actress, credited for her work, and she was not abused by Warner. (Meyer Decl., ¶ 11.)	Lacks Foundation (Evid. Code § 403) Lack of Personal Knowledge (Evid. Code § 702) Hearsay (Evid. Code § 1200, et seq.) Secondary Evidence Rule (Evid. Code § 1523) (“Groupie” is not before the Court and Plaintiff cannot prove it contents—including who appears in it and what occurs—through testimony. Moreover, a genuine dispute exists concerning the contents of the film.)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
85.	Holley’s first voicemail is as follows: “Hi. Good morning. This message is for Michelle Langer. My name is Shawn Holley S-H-A-W-N H-O-L-L-E-Y. This is a really bad connection. I think I’m gonna call back. Bye.” (Meyer Decl., ¶ 16.)	Irrelevant (Evid. Code § 350) Hearsay (Evid. Code § 1200, et seq.) Secondary Evidence Rule (Evid. Code § 1523) (Meyer purports to describe the contents of evidence that is not before the Court.)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
86.	Holley’s second voicemail is as follows: “Hi it’s Shawn Holley again. Hopefully this is better. Um I am a lawyer in Los Angeles and I represent Evan Rachel Wood. And um I was just hoping we could touch base at some point um and perhaps I could be the point person cause, you know, for obvious reasons she doesn’t um, you know, have an understanding of everything that’s happening and I’m not saying that I will either, but as a lawyer who works in the criminal justice system, I’m probably a better person to explain	Irrelevant (Evid. Code § 350) Hearsay (Evid. Code § 1200, et seq.) Secondary Evidence Rule (Evid. Code § 1523) (Meyer purports to describe the contents of evidence that is not before the Court.)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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	<p>things and act as a go-between or liaison if that is okay with you. Um my name is again Shawn S-H-A-W-N Holley H-O-L-L-E-Y. My cell phone number is the best way to reach me 323-397-[REDACTED]. That s 323-397-[REDACTED]. My email address is S-H-O-L-L-E-Y @[REDACTED] sholley@[REDACTED]. It is 10:45 on Tuesday. Urn I know it's a holiday week and hopefully people are already on vacation mode, but if you have a minute to spare to give me a call whenever you can, I greatly appreciate it. Thank you. Happy holidays.” (Meyer Decl., ¶ 17.)</p>		
87.	<p>Bell’s voicemail is as follows: “Hi uh I believe I’m looking for Michelle Langer of the Federal Violent Crimes Department. Um my name is Jamie Bell. I’m calling in regards to uh uh Evan Rachel Wood. She is the mother of my son Jack Donovan Bell. She has informed me that it’s important that I contact you um regarding uh uh what’s going on. I’m actually completely unaware of what’s happening. Um so I’ve been told to reach out to you. Um my cell phone number, I live in California, I have pretty bad uh cell phone reception um but I’ll give it to you anyway. My cell is 917-216- [REDACTED]. Um let me give you my home number also. We’re home most of the day. Oh who isn’t, I know. Um the number is 323-460-[REDACTED]. Um I’d appreciate a call back uh at your earliest convenience. Thank you so much. Bye.” (Meyer Decl., ¶ 18.)</p>	<p>Irrelevant (Evid. Code § 350) Hearsay (Evid. Code § 1200, et seq.) Secondary Evidence Rule (Evid. Code § 1523) (Meyer purports to describe the contents of evidence that is not before the Court.)</p>	<p><input type="checkbox"/> Sustained <input type="checkbox"/> Overruled</p>

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88.	I was shocked that Gore had apparently either given my phone number to Holley and Bell or had given my phone number to Wood who then gave my phone number to Holley and Bell, and likely told Holley and Bell that my phone number belonged to Michelle Langer. (Meyer Decl., ¶ 19.)	Lacks Foundation (Evid. Code § 403) Lack of Personal Knowledge (Evid. Code § 702) Irrelevant (Evid. Code § 350)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
89.	Bell’s voicemail is as follows: “Hi I’m looking for a Michelle Langer. Um I called yesterday. My name is Jamie Bell. I’m calling uh uh, strange call actually. I’m calling about um uh Evan Rachel Wood and a case that is pertaining to her and her involvement uh within a case in terms of her being uh uh a material witness in something. Has to do with the uh custody of our child. Uh we share custody of him. His name is Jack Donovan Bell. I have a couple questions for you if you would not mind uh calling me back. I know it’s close to the holidays um but uh as it does pertain to custody of child um and well-being of a child, I, I hope that you’ll uh understand that it’s some urgency. Um let me give you my number 323-460-[REDACTED]. I would really appreciate it um if you could get back to me uh as soon as possible. Thank you so much. Happy holidays. Hope you’re well. Bye.” (Meyer Decl., ¶ 24.)	Irrelevant (Evid. Code § 350) Hearsay (Evid. Code § 1200, et seq.) Secondary Evidence Rule (Evid. Code § 1523) (Meyer purports to describe the contents of evidence that is not before the Court.)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
90.	Since Gore failed to fix the issue and provide Bell with the correct phone number for Michelle Langer and Bell sounded extremely concerned about the well-being of his child ... (Meyer Decl., ¶ 25.)	Irrelevant (Evid. Code § 350) Secondary Evidence Rule (Evid. Code § 1523) (Meyer purports to describe the contents of evidence that is not before the Court.) Lacks Foundation (Evid. Code § 403)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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		Lacks Personal Knowledge (Evid Code § 702)	
91.	The article contained three pages from Wood’s declaration from her custody case which made me realize my phone number was used illegally by Gore and Wood. The three pages from Wood’s declaration have an odd transparent copyright with the name of what appears to be the law firm that represented Wood. (Meyer Decl., ¶ 28.)	Lacks Foundation (Evid. Code § 403) Lacks Personal Knowledge (Evid Code § 702) Improper Lay Opinion (Evid. Code § 800) (as to legality of alleged use) Inadmissible Legal Conclusion (Evid. Code §§ 310, 800 et seq.) (as to “transparent copyright” and what it means”)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
92.	A true and correct copy of the three pages from Wood’s declaration that were posted online by the Daily Mail are attached hereto as EXHIBIT L. (Meyer Decl., ¶ 28.)	Lacks Foundation (Evid. Code § 403) Lacks Personal Knowledge (Evid Code § 702) Hearsay (Evid. Code § 1200, et seq.)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
93.	Meyer Decl. Ex. L	Lacks Foundation (Evid. Code § 403) Lacks Personal Knowledge (Evid Code § 702) Hearsay (Evid. Code § 1200, et seq.)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
94.	On page 2 of Wood’s declaration, in Section 7, Wood state, “To punctuate the seriousness of the situation, I was provided with a correspondence from a representative of the Federal Violent Crimes Department from the FBI. A true and correct copy of this correspondence is attached as Exhibit “A.” The foregoing individuals wrote...” (Meyer Decl., ¶ 29.)	Lacks Foundation (Evid. Code § 403) Lacks Personal Knowledge (Evid Code § 702) Lack of Authentication / Document Speaks for Itself (Evid. Code §§ 1400-1401)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
95.	On page 2 of Wood’s declaration, in Section 10, Wood mentions an email she sent to Bell on December 22, 2020. She stated in the email to Bell “I will forward you my contact at the FBI and you should feel free to call him with whatever questions you have.” (Meyer Decl., ¶ 30.)	Lacks Foundation (Evid. Code § 403) Lacks Personal Knowledge (Evid Code § 702) Lack of Authentication / Document Speaks for Itself (Evid. Code §§ 1400-1401)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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96.	<p>She informed me that my phone number was on a letter which states that it was authored and signed by Michelle Langer, but below Michelle Langer’s name in the signature block, appears my phone number—the same phone number I used to communicate with Gore. (Meyer Decl., ¶ 31.)</p>	<p>Hearsay (Evid. Code § 1200, et seq.) Lacks Foundation (Evid. Code § 403) Lacks Personal Knowledge (Evid Code § 702)</p>	<p><input type="checkbox"/> Sustained <input type="checkbox"/> Overruled</p>
97.	<p>... but instead of helping me, Gore and Wood have caused me severe emotional distress by illegally using my phone number on a forged FBI letter, using the forged FBI letter, distributing the forged FBI letter, and subjecting me to a possible criminal investigation. I have no idea to what extent Gore and Wood illegally used my phone number, since both Gore and Wood have failed to provide any details surrounding the forged FBI letter and illegal use of my phone number. (Meyer Decl., ¶ 33.)</p>	<p>Lacks Foundation (Evid. Code § 403) Lacks Personal Knowledge (Evid Code § 702) Improper Lay Opinion (Evid. Code § 800) Inadmissible Legal Conclusion (Evid. Code §§ 310, 800 et seq.) Inadmissible because it contains argument and is based on opinion, not fact (<i>see</i> authority, supra n. 1)</p>	<p><input type="checkbox"/> Sustained <input type="checkbox"/> Overruled</p>

DATED: November 22, 2022

KINSELLA WEITZMAN ISER KUMP HOLLEY LLP

By: 
 Michael J. Kump
 Attorneys for Defendant
 EVAN RACHEL WOOD

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PROOF OF SERVICE

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 808 Wilshire Boulevard, 3rd Floor, Santa Monica, CA 90401.

On November 22, 2022, I served true copies of the following document(s) described as **DEFENDANT EVAN RACHEL WOOD'S EVIDENTIARY OBJECTIONS IN SUPPORT OF SPECIAL MOTION TO STRIKE** on the interested parties in this action as follows:

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BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address MSanks@kwikhlaw.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

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

Executed on November 22, 2022, at Santa Monica, California.



Mary L. Sanks