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 7

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

11 BRIAN WARNER p/k/a MARILYN
 MANSON,

12 Plaintiff,

13 vs.
 14

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

16 Defendants.
 17
 18

CASE NO. 22STCV07568

DECLARATION OF HOWARD E. KING

[Filed concurrently with: Opposition to Gore’s
 anti-SLAPP Motion; Opposition to Wood’s
 anti-SLAPP Motion; Supplemental King
 Declaration; Berk Declaration; Warner
 Declaration; Balog Declaration; Weiss
 Declaration; Meyer Declaration; Kunkel
 Declaration; B. Gore Declaration; Opposition
 to Gore’s RJN; Objections to Defendants’
 Evidence; Notice of Lodging; Application to
 Seal; [Proposed] Order Granting Sealing
 Application]

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

The Hon. Teresa A. Beaudet, Dept. 50

Action Filed: March 2, 2022
 Trial Date: Not Set

1 5. These publicly available documents further state that attached to Bell's sworn
2 declaration are emails between Bell and Wood, in which Wood told Bell on December 23, 2020,
3 in response to Bell's statement that, "It appears I have been calling the incorrect number for two
4 days," that, "If the number Michelle put on her official letter isn't reaching her, then I would
5 assume the other number is also correct. I also signaled you another number." Bell responded,
6 "The number beneath Michelle's signature on the letter you sent belongs to a different Michelle."
7 Wood responded, "I see. Not sure what happened then. You'll have to ask Michelle when you
8 reach her." (Ex. A, pp. 41-44.)

9 6. These publicly available documents further state that attached to Bell's and Wood's
10 sworn declarations are copies of a letter purportedly written and signed by FBI Agent Michelle
11 Langer. (Ex. A, pp. 5 (¶ 8), 12, 26 (¶14), 32.)

12 7. On March 2, 2022, Warner filed a complaint in the above-captioned action.

13 8. On or about March 2, 2022, I instructed my office to download and print any tweets
14 posted from the "verified" Twitter account of Illma Gore ("@illmagore"). A true and correct copy
15 of three such tweets that were collected at my direction on or around March 3, 2022 is attached
16 hereto as Exhibit B.

17 9. On April 28, 2022, Wood filed a special motion to strike portions of the complaint.
18 On May 24, 2022, Gore filed a similar special motion to strike, following a stipulated extension.
19 Wood and Gore noticed hearings on their motions for December 13, 2022 and January 31, 2023,
20 respectively. Based on these dates, we understood and relied upon the fact Warner would have
21 several months to (i) collect and organize the admissible evidence needed to defeat Defendants'
22 motions and, (ii) where additional evidence was needed but not available to Warner (such as
23 evidence regarding Wood's and Gore's intent), to file a noticed motion seeking an order to lift the
24 automatic discovery stay.

25 10. Prior to the July 6, 2022 Case Management Conference, my office met and
26 conferred with counsel for Wood. Counsel for Wood was informed Warner would be seeking to
27 lift the discovery stay. The topic of advancing the motion hearing noticed for December 2022 was
28 not discussed. In Wood's CMC statement, she did not ask for the hearing to be advanced.

1 11. Prior to the July 6, 2022 Case Management Conference, my office met and
2 conferred with counsel for Gore. Counsel for Gore was informed Warner would be seeking to lift
3 the discovery stay. The topic of advancing the motion hearing noticed for January 2023 was not
4 discussed. In Gore's CMC statement, she did not ask for the hearing to be advanced.

5 12. At the July 6, 2022 Case Management Conference, the Court ordered *sua sponte*
6 that Wood's hearing be advanced to August 18, 2022, and Gore's to September 13, 2022,
7 compressing the time Warner had to oppose the motions to just a matter of weeks, given that the
8 first opposition would be due August 5, 2022 under Code of Civil Procedure Section 1005(b).
9 The Court advised Warner that to the extent he sought discovery in advance of the new August 5
10 opposition deadline, he move for such an order *ex parte*.

11 13. Warner will suffer immediate and irreparable harm if the request for limited
12 discovery is not heard on shortened time (and the hearings not continued), including because if
13 Warner and the Court were to comply with the regular notice requirements of Code of Civil
14 Procedure Section 1005(b), a hearing on regular notice could not be held until after his opposition
15 to the first motion to strike was already due, and Warner would be deprived of specific admissible
16 facts within Defendants' and certain non-party witnesses' control needed to establish his *prima*
17 *facie* case and defeat the motions to strike.

18 14. My office attempted but was unable to obtain a declaration from non-party witness
19 Michelle Meyer. Counsel for Meyer stated she would be willing and able to comply with a court
20 order or subpoena, and he would accept service on her behalf. Attached hereto as **Exhibit C** are
21 true and correct copies of text and/or emails messages between Gore and Meyer that Warner seeks
22 to have authenticated through the limited discovery requested. I understand Meyer may be living
23 outside of California.

24 15. My office attempted but was unable to obtain a declaration from third party
25 Katheryn McGaffigan. Attached hereto as **Exhibit D** are true and correct copies of text and/or
26 emails messages between Gore and McGaffigan that Warner seeks to have authenticated through
27 the limited discovery requested. I understand McGaffigan may be living outside of California.
28

EXHIBIT A

THE THIRD CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE
AT NASHVILLE

EVAN RACHEL WOOD,)	
<i>Petitioner/Mother,</i>)	
)	
v.)	Docket No. 21D-284
)	
ANDREW J. MATFIN-BELL,)	
<i>Respondent/Father.</i>)	

NOTICE OF FILING OF CALIFORNIA PLEADINGS

Comes now the Petitioner/Mother, EVAN RACHEL WOOD, by and through counsel, and files the following pleadings filed in the California lawsuit for this Court’s consideration in any future conversations and/or communications with the California tribunal:

Exhibit 1: Mother’s Motion to Quash & Dismiss filed on March 22, 2021; and

Exhibit 2: Mother’s Opposition to Father’s Request for Orders re: Custody filed on March 22, 2021.

Respectfully submitted,

Larry Hayes, Jr. No. 15481

lhaves@havesthomas.law

Rachel M. Thomas No. 27584

rthomas@havesthomas.law

Hayes ♦ Thomas, PLC
214 Second Avenue North, Suite 103
Nashville, Tennessee 37201
(615) 256-2602


*Attorneys for Mother,
Evan Rachel Wood*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served via the following method(s) upon the following individual(s) on this the 29 day of **March, 2021**.

Rose Palermo, Esq.
Cheatham, Palermo & Garrett
43 Music Square West
Nashville, Tennessee 37203
Michellemarshall.cpg@gmail.com

Electronic Mail
 U.S. Mail
 Facsimile
 Hand Delivery
 Electronic Filing



Larry Hayes, Jr.

Declaration of Evan Rachel Wood

EXHIBIT 1
023

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MEYER, OLSON, LOWY & MEYERS, LLP
10100 Santa Monica Boulevard, Suite 1425 · Los Angeles, California 90067

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DECLARATION OF EVAN RACHEL WOOD

I, EVAN RACHEL WOOD, declare as follows:

1. I am the Respondent in the above-entitled matter. I submit this declaration in support of the above-entitled matter, and if called upon as a witness, I could and would testify competently to the following:

2. I was in a previous relationship with Petitioner, Andrew James Matfin-Bell (“Jamie”). We are the parents of Jack Donovan Bell (“Jack”) who was born on July 29, 2013, age 7.

3. I am making a *special appearance* to respectfully request that the Court dismiss, abate, strike or stay the Petition to Determine Parental Relationship filed by Jamie [case number 21STPT00170] as California is not a jurisdictionally proper forum for making an initial custody determination concerning Jack, on several grounds:

- A. The alleged service upon me of the Summons and Petition in Jamie’s Paternity Action in California was defective; therefore, the Summons should be quashed and this matter should be dismissed;
- B. For Lack of Subject Matter Jurisdiction pursuant to *Family Code* § 3421(a)(1). California is not Jack’s “home state” and thus it is not procedurally proper for California to assume jurisdiction;
- C. Pursuant to *Family Code* § 3421, subdivision (a)(2), Jack no longer has a significant connection to California, and substantial evidence of Jack’s care and relationships are in Tennessee. There is a pending action in Tennessee. Thus, if the California court is inclined to entertain Jamie’s action, then the California and Tennessee courts must first communicate to determine the appropriate jurisdiction; and
- D. Given the dangers posed to Jack and me if we are forced to relocate to Los Angeles, Tennessee is a more appropriate forum.

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MEYER, OLSON, LOWY & MEYERS, LLP
10100 Santa Monica Boulevard, Suite 1425 - Los Angeles, California 90067

1 Recent Background

2 4. I am an actor and I have been working professionally since I was 5 years of
3 age. In addition to my work in film, I am the founder of the Phoenix Act (this legislation
4 expanded the statute of limitations for domestic violence crimes and redefined domestic
5 abuse to include coercive control).

6 5. I am a key witness in pending a pending criminal investigation. In
7 connection with the investigation, I allege that I was the victim of torture, rape, and
8 pedophilic grooming by an internationally-known public figure. I am not the only woman
9 who has alleged the foregoing criminal conduct and I personally know of many other
10 women who have advanced allegations against the same individual.

11 6. I am extremely afraid of the alleged offender. I have suffered severe,
12 traumatic physical and emotional injury at his hands, and I am afraid that he will seek
13 retribution against me for testifying by harming me, our son, and members of our family.

14 7. Due the seriousness of the allegations, the potential danger to me as a key
15 complaining witness, and the inevitability that the criminal investigation would become
16 public knowledge, I was advised by criminal investigators that my and my family's safety
17 was at risk.

18 8. To punctuate the seriousness of the situation, I was provided with a
19 correspondence from a representative of the Federal Violent Crimes Department from the
20 FBI. A true and correct copy of this correspondence is attached as **Exhibit "1."** The
21 foregoing individuals wrote:

"Please be advised that Ms. Evan Rachel Wood is a key
witness in connection with 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. Contact for more information regarding the safety of
victims Human and Sex Trafficking crimes." *[Emphasis added.]*

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23
24
25 9. I have had a home in Tennessee since 2016. My Tennessee Residence is in
26 the name of a trust for purposes of confidentiality and safety. The investigators made
27 clear to me that our son could easily be targeted by the alleged offender – who is Los
28 Angeles based – and who is not in custody at this time.

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1 10. Approximately four months ago, in late November 2020, I made the decision
2 to exclusively reside in the Tennessee home. At no time did I conceal from Jamie our
3 whereabouts. In November and December 2020, Jamie was filming a movie in New
4 Mexico and did not visit us. Jamie and I agreed that I would have Jack in Nashville under
5 my care through at least December 18, 2020 while he was filming in New Mexico.

6 11. On December 22, 2020, I was finally in the position to tell Jamie about the
7 criminal investigation. I sent him an email, a true and correct copy of which is attached as
8 **Exhibit "3."** I wrote:

9 "...Jack and I will be staying in Nashville for the immediate
10 future. As you will soon find out, I am a material witness in a
11 high profile criminal investigation which likely will be public in
12 the near future. I have been advised that both Jack and my
13 safety is at risk and that it is in our best interests to remain in
14 Nashville. I will forward you my contact at the FBI and you
15 should feel free to call him with whatever questions you
16 have. I know how difficult this is for you to be away from Jack
17 for an extended period of time. I will do whatever I can to
18 accommodate you should you want to come here and visit him
19 whenever you want. I of course will facilitate Facetime with
20 Jack on a frequent basis. I am available to answer any
21 questions you may have. Thank you for your understanding
22 during this very difficult time."

23 12. Despite my offers for Jamie to see our son in Tennessee, Jamie did not
24 travel to Tennessee to visit our son in December 2020, January 2021, or February 2021.
25 Recently, in late March 2021, Jamie accepted my open invitation to visit Jack. Jamie
26 would not agree to travel to Tennessee and insisted that his parenting time take place in a
27 "neutral" location. This past weekend, I brought Jack to Florida where he will spend two
28 weeks with his father before returning to Nashville to be with me.

Background as to Jack's Residences

1 13. I gave birth to Jack in 2013 in Los Angeles. At the time, Jamie and I were not
2 married, despite my wishes that I would have been married by the time Jack was born.
3 Jamie and I were both working actors and after Jack's birth we travelled to Virginia so
4 Jamie could work on a television show. I returned with Jack to Los Angeles in 2014 due to
5 Jamie's problematic drinking (he was hospitalized at one point for his alcohol abuse while

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1 working) and that he was not engaged with Jack and participating in his care as an active
2 parent.

3 14. Throughout 2014, Jamie was working on a movie and rarely visited Jack in
4 Los Angeles. Over the course of the next few years, Jamie and I barely had a relationship.
5 We argued when we communicated, Jamie was often drunk, and he refused to participate
6 in therapy. My understanding is that Jamie started dating someone else (his now wife) and
7 I did as well. In 2015, I informed Jamie that I intended on leaving Los Angeles with Jack as
8 I no longer felt comfortable living in Los Angeles¹, in part due to the ongoing struggles I
9 had had with the trauma I endured at the hands of the alleged offender, discussed above.
10 Jamie did not oppose my relocation. In 2016, I purchased my home in Nashville,
11 Tennessee with the intent of making that home my primary/permanent residence.

12 15. In 2016, I relocated to Nashville with Jack. Since that time, I have filed
13 income tax returns in Tennessee as my state of residence and am registered to vote there.
14 Jamie and I agreed that Jack would live bi-coastally, between Los Angeles and Nashville
15 on a rotating monthly schedule. Since 2016, Jack was enrolled in the Waldorf School in
16 Nashville. In 2017, after Jack had been experiencing sensory difficulties and displaying
17 other concerning behaviors in school, I attempted to get Jack into therapy, only to be
18 prevented from doing so by Jamie for two years. Jamie insisted that I return to Los
19 Angeles to meet with him in counseling before commencing Jack in therapy. Ultimately,
20 this was a ruse to get me to Los Angeles so Jamie could serve me with his initial paternity
21 petition in Los Angeles (he ultimately dismissed that petition) which I had no idea he had
22 filed. Thereafter, Jamie took Jack to Virginia for a short time while he was working. Jamie
23 assured me in our co-parenting sessions with Lisa Hacker that he, or his mother, or his
24 manager would be caring for Jack while they were in Virginia. I later learned that neither
25 Jamie, nor his mother or manager were caring for Jack. Rather, he had others do so,
26 contrary to what he had assured me and our co-parenting sessions.

27
28 ¹ In fact, I had told Jamie long before Jack was born that I would not be living in Los Angeles long-term, nor was I comfortable raising a child in Los Angeles.

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1 16. In 2018, I purchased a second home in Los Angeles solely to serve as
2 temporary housing when I was filming in Los Angeles – though I continued to maintain my
3 Nashville home as my and Jack’s primary residence. I knew he needed therapy to address
4 his special needs and that Jamie was not providing that for him. I was under the
5 impression we were still going to enroll him in Waldorf so he could be bi-coastal. We came
6 up with a new custody plan in mediation that accommodated both Nashville and LA. Jamie
7 agreed to Jack and I keeping a residence in Nashville and accommodating that. However,
8 Jamie ultimately changed his mind and insisted on Jack attending the Pilgrim School in
9 Los Angeles. Once Jack was diagnosed with ADHD, Jack transferred to the Children’s
10 Community School in September 2020. His schooling has been remote due to the
11 pandemic since March 2020 and he has not been physically on the campus since March
12 2020.

13 17. Notwithstanding that Jack attended school remotely out of Los Angeles, we
14 continue to return to our home in Nashville regularly. We spent the majority of our
15 summers in Nashville (when I was not working) and we remained in Nashville for major
16 holidays, such as Christmas. The majority of my family and Jack’s family reside very near
17 Nashville. Jack also has many friends here in Nashville. Jack regularly receives medical
18 care in Nashville and has a pediatrician here in Nashville. Jack also participates in
19 Occupational Therapy in Nashville.

20 18. There is certainly more detail into our relationship and my concerns
21 regarding Jamie’s judgment and parenting that I could provide the Court and will do so as
22 part of my response to Jamie’s request for custody. I detail the above for the Court to
23 provide context to Jack’s history in Nashville and Jamie’s agreement that he reside there a
24 significant amount of time, and then eventually, due to the criminal action, permanently. It
25 was never my intention, nor Jamie’s, that Los Angeles would be Jack’s primary home, and
26 we did not conduct our lives in that manner. In fact, given our careers, we regularly spent
27 months at a time in different locations.

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1 19. As mentioned above, I decided to remain permanently at my residence in
2 Nashville with our son (rather than continue to be bi-coastal) in November 2020 due to the
3 very severe implications of my being a key witness in a federal criminal investigation. I
4 made this decision with full disclosure to Jamie.

5 **California and Tennessee Paternity Proceedings**

6 20. When I sent Jamie the email on December 22, 2020, there was no paternity
7 action pending in any court of law. Jamie had previously filed Paternity Case Number
8 BF059003 in April of 2017, however he dismissed that action on or about in January 2020,
9 leaving no action pending for over a year when the majority of these events occurred.

10 21. Thereafter, on February 22, 2021, I filed a Paternity Action in Tennessee and
11 served Jamie on February 26, 2021. Attached as **Exhibit "4"** is a true and correct copy of
12 the action I filed in Tennessee. Attached as **Exhibit "5"** is a true and correct copy of the
13 proof of service of the action I filed in Tennessee.

14 22. As far as I knew, there was no paternity action filed in California at that time
15 that I filed my action in Tennessee because Jamie never told me or served me with
16 anything. Unbeknownst to me, however, Jamie re-filed a Paternity Petition in Los Angeles
17 Superior Court on January 29, 2021, along with a Request for Order Regarding Child
18 Custody. However, Jamie did not attempt to serve his Petition and Request for Order until
19 February 26, 2021, the same day that I served Jamie with my Tennessee Petition.
20 Attached as **Exhibit "2"** is a true and correct copy of Jamie's alleged Proof of Service and
21 Declaration of Service. I note that I was not personally served, nor was anyone in my
22 home served with the California Petition. I never received Jamie's California Petition in the
23 mail at any location. In fact, I did not even know about Jamie's action in California until I
24 was given ex parte notice by him via email on March 1, 2021.

25 23. In conclusion, since I purchased my home in Nashville in 2016, I have
26 considered it my primary residence, and for a large portion of his life, on an ongoing basis,
27 Jack has resided there. He has resided there permanently since November 2020 (i.e.
28 nearly 4 months) with Jamie's knowledge. I have not kept Jack from Jamie, who has the

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1 means and opportunity to visit Jack whenever he wishes. Moreover, I have conveyed to
2 Jamie my very real and deep concerns regarding my and Jack's safety should we take up
3 residence in Los Angeles.

4 24. For the foregoing reasons, I respectfully request that the Court grant the
5 within requested relief and dismiss this proceeding.

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

8 Executed on March 22, 2021 at Nashville, Tennessee.

Evans Wood

EVAN RACHEL WOOD

MEYER, OLSON, LOWY & MEYERS, LLP
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Exhibit “1”

EXHIBIT 1
031

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To Whom it May Concern,

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.

Contact for more information regarding the safety of victims Human and Sex Trafficking crimes.



Federal Violent Crimes Department
Michelle Langer
(949) 202- REDACTED

GULLERMO SANTISO
DEPUTY DISTRICT ATTORNEY
gsantiso@da.lacounty.gov
(760) 473-7753

Sergeant Jeffrey Walker
Special Victims Bureau
LOS ANGELES REGIONAL
HUMAN TRAFFICKING TASKFORCE
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Exhibit “3”

EXHIBIT 1
041

From: Lenore Pink [REDACTED]
Date: December 22, 2020 at 10:22:28 AM PST
To: James Bell [REDACTED]

Dear Jamie,

I am writing this email to you to let you know that Jack and I will be staying in Nashville for the immediate future. As you will soon find out, I am a material witness in a high profile criminal investigation which likely will be public in the near future. I have been advised that both Jack and my safety is at risk and that it is in our best interests to remain in Nashville. I will forward to you my contact at the FBI and you should feel free to call with whatever questions you have.

I know how difficult this is for you to be away from Jack for an extended period of time. I will do whatever I can to accommodate you should you want to come here to visit him whenever you want. I of course will facilitate FaceTime with Jack on a frequent basis. I am available to answer any questions you may have. Thank you for your understanding during this very difficult time.

-Shine on

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IN THE FOURTH CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE
AT NASHVILLE

EVAN RACHEL WOOD,
Petitioner/Mother,
v.
ANDREW J. MATFIN-BELL,
Respondent/Father.

Case No. 21D-284

NOTICE OF FILING OF CALIFORNIA PLEADINGS

Comes Respondent/Father, Andrew J. Matfin-Bell, by and through counsel and files the following pleading filed in the California lawsuit for this Court's consideration in any future conversations and/or communications with the California tribunal:

TN EXHIBIT 1: Petitioner's Reply to the Opposition Filed by Respondent Evan Rachel Wood to Petitioner's RFO Regarding Child Custody

RESPECTFULLY SUBMITTED,



BY: ROSE PALERMO. #3330
CHEATHAM, PALERMO & GARRETT
43 Music Square West
Nashville, Tennessee 37203
michellemarshall.cpg@gmail.com
615-244-4270
Attorney for Respondent/Father

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was electronically mailed on this 29th day of March, 2021 to:

Larry Hayes
Rachel Thomas
Attorneys for Petitioner/Mother
214 Second Avenue North
Suite 103
Nashville, TN 37201


Rose Palermo

COPY

DECLARATION OF PETITIONER

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DECLARATION OF ANDREW JAMES MATFIN-BELL

I, ANDREW JAMES MATFIN-BELL, hereby declare as follows:

1. I am the Petitioner in the within matter. I have personal knowledge of the following facts, and if called upon, I could and would testify competently thereto. I submit the following in support of my reply to the opposition filed by Respondent Evan Rachel Wood ("Evan") to my Request for Order.

2. **Evan continues to withhold our son Jack from me out of state.** As I explained to the Court in detail in my January 22, 2021 declaration in support of this Request for Order, Evan abruptly and unilaterally decided to withhold Jack from me in mid-December 2020. I will not repeat here what I explained to the Court in my January 22, 2021 declaration. But I will add that my repeated attempts to put even a temporary custody plan in place have been ignored or refused by Evan. That Evan just last week allowed me to take a trip with Jack in Florida, conveniently right before the hearing on my Request for Order, does not change the fact that Evan is preparing to continue withholding Jack in Tennessee and that we have no timetable for a return to the 50/50 custody we previously shared. It is simply not true that I consented to Evan keeping Jack outside of California as she falsely claims or that I have not been trying to desperately to get him back and see him. Here are just some examples of such attempts:

i. I asked Evan to speak with me and the co-parenting therapist we used in the past, Lisa Hacker, MFT, to figure out a custody plan. Ms. Hacker contacted Evan as well. Evan did not respond. True and correct copies of examples of these emails I sent or received regarding speaking with Ms. Hacker are attached collectively as **Exhibit 7**.

ii. I attended mediation with Evan and our respective attorneys at Evan's request on February 18, 2021 with Hon. Scott Gordon (Ret.). I tried to do this mediation earlier in January but Evan and her counsel would only agree to the February 18 date. A true and correct copy of an email I sent to Evan again pleading for an earlier mediation date so that I could see Jack is attached as **Exhibit 8**. I agreed to use the judicial officer she proposed and to pay one-half of the cost. After several hours of discussion, Evan and her counsel abruptly left and refused to put even a temporary plan in place for our son to be returned to my custody and his home in California. I believe that the

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1 entire mediation was just another bad faith delay on Evan's part and that she made no real effort to
 2 resolve custody. On the Monday immediately following this bad faith mediation, February 22, 2021,
 3 Evan filed a custody action in Tennessee. I believe this was yet another stall tactic. I have had to
 4 hire local counsel for the limited purpose of challenging jurisdiction in Tennessee. I have never
 5 resided in Tennessee. I have only visited Tennessee briefly to visit with Jack in the past when Evan
 6 brought him there over the holidays or a break from school. The idea that our custody case might
 7 proceed in Tennessee is absurd to me. Evan spends approximately eight months in Los Angeles
 8 each year filming the HBO television show Westworld, let alone other film or television projects.
 9 Evan has told me she is coming back to Los Angeles this June 2021 to film the next season of
 10 Westworld.

11 iii. I sought ex parte custody orders from this Court on March 2, 2021.

12 iv. I continue to message Evan with the hope (however dim now) of working
 13 something out with her. Evan tells me to talk to her lawyers while her lawyers represent to mine that
 14 she and I are discussing the issue. I have attached true and correct copies of just some of the emails I
 15 have sent to Evan to reach a resolution collectively as Exhibit 9.

16 v. My lawyers have written to Evan's lawyers and made multiple proposals so
 17 that Jack could spend some time with me outside of Los Angeles where Evan contends he would be
 18 in danger. I have suggested meeting her and Jack in a neutral location half-way between here and
 19 Nashville, Tennessee where she has been withholding Jack from me. I am not comfortable going to
 20 Tennessee because Evan filed a request for restraining orders in Tennessee to prevent me from
 21 leaving the state with Jack. I have also suggested that Jack spend time with me in Florida where my
 22 in-laws have a residence. When Evan's attorneys finally provided some actual dates she would
 23 supposedly agree to, they were not until late March and she also continued to suggest I come to
 24 Tennessee where she had sought the restraining order against me. Evan's attorneys then indicated
 25 on March 17, just before Evan's response paperwork was due to this Court, that I could have Jack
 26 Florida from March 20 through April 3 as I had asked. It is the first and only time she has permitted
 27 me time with Jack since December 2020.

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FILED 03/29/21 05:41 PM CASE NO. 21B184 Richard R. Rooker, Clerk

1 3. I would also like the Court to know that Evan’s recent behavior with Jack is truly
 2 alarming. Evan is thankfully still facilitating Facetime though that is the only contact I have with
 3 Jack now apart from her recent concession to let me see Jack in Florida. During a Facetime call I
 4 had with Jack on February 25, 2021, Jack said something to the effect of “You’re not good Daddy,
 5 you’re not here.” It broke my heart. A few weeks earlier, Jack told me he drew a picture of a man
 6 who has been hurting him. Evan jumped onto the call and corrected him, saying not the man hurting
 7 you, the man hurting me. Jack said that the man’s name is Brian (Marilyn Manson’s real name) and
 8 he lives three miles from my house (in Los Angeles) and said that was why he was staying in
 9 Nashville. Evan’s initial contention as to why she failed to return Jack to California was because she
 10 says she is involved in a high profile investigation regarding supposed abuse by Brian. I have
 11 nothing to do with this investigation but Evan contends that she is now fearful for her and Jack’s
 12 safety. During our recent stipulated visitation that Evan allowed at my in-laws house in Florida,
 13 Jack voiced his concern for his safety and reminded us repeatedly of the man who hurt his mom, and
 14 displayed emotional outbursts related to the case his mother is involved in. When I mentioned fun
 15 things to do in the future, Jack told me he could only do them “if Brian is in jail.” I am absolutely
 16 appalled and terrified that Evan is feeding this information to our 7-year-old.

17 4. Evan previously made similar allegations of abuse against Marilyn Manson, which
 18 has been well documented in the press. Their relationship and alleged abuse took place many years
 19 ago. I fully support Evan and any victim of abuse. But any such abuse here is not new and does not
 20 involve me or our son. I know Evan loves our son but I am very concerned by how she is handling
 21 the current situation. Whatever fears Evan may have regarding third parties should have nothing to
 22 do with me or custody of our son. I do not even want to think of the short- and long-term
 23 psychological harm Evan might be inflicting upon Jack with this kind of talk and my prolonged
 24 separation from him. I worry now that Evan is alienating me from Jack, even inadvertently. I
 25 simply want to normalize things for our son and to bring him home to Los Angeles.

26 5. It is absurd to me that Evan is now bringing up events from 7 or 8 years ago (when
 27 was in my twenties) to somehow malign me. While Evan and I both travel at times to work on
 28 location, we have otherwise shared 50/50 custody in Los Angeles for years and I am a devoted father

FILED 03/29/21 05:42 PM CASE NO. 21D284 Richard R. Tucker, Clerk

1 to Jack as well as to Jack's sister Ripley, my nearly two-year-old daughter with my wife Kate. Evan
2 and I have not been in a romantic relationship for almost seven years but during that time have been
3 mostly successful at co-parenting Jack here in Los Angeles. We each facilitated drop-offs and pick-
4 ups, accommodated each other's sometime irregular work schedules, alternated holidays, and
5 together planned, organized, and attended Jack's birthdays, the most recent of which we held at my
6 and my wife Kate's house during the pandemic lockdown with Evan and her partner in attendance.

7 6. Jack could have returned to in-person schooling in February 2021 with his classmates
8 at his school, Children's Community Center in Van Nuys, but Evan is now precluding him from
9 doing so. It was Evan who wanted Jack transferred to this school last summer (from his former
10 school in Los Angeles as well), and now she won't allow him to attend in-person learning. I believe
11 it is detrimental to Jack to miss out on his classmates and teachers and the socialization in-person
12 instruction fosters. Jack's teachers have also told me in-person learning is better for Jack's
13 development. Re-enrollment forms for the next school year were due at the end of February 2021
14 and both Evan and I provided the re-enrollment paperwork to the school. A true and correct copy of
15 a March 1, 2021 confirmation email I received from Jack's school is attached as **Exhibit 10**.

16 7. I did not see Evan mention in her paperwork that she has a house in Sherman Oaks,
17 located at REDACTED. This is the house where Jack lived with her during her 50%
18 custody time prior to her withholding Jack in Tennessee this December. The house is held in the
19 name of a California trust that is managed by a California trustee, our former joint business manager
20 at Gursey Schneider. I have attached true and correct copies of the deed documents as **Exhibit 11**.

21 ///
22 ///
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28 ///

DECLARATION OF ANDREW JAMES MATTIN-BELL

I, ANDREW JAMES MATTIN-BELL, hereby declare as follows:

1. I am the Petitioner in the within matter. I have personal knowledge of the following facts, and if called upon, I could and would testify competently thereto. I submit the following in support to my Request for Order.

2. Respondent Eyan Rachel Wood ("Evan") and I have one child together, our son Jack Donovan Bell ("Jack"), who was born on July 29, 2013 in Los Angeles. Evan and I dated and lived together years ago in Los Angeles but we never formally married. I am on Jack's birth certificate and Evan has never contested paternity. I have another child, a daughter who will be two in May 2021, with the woman I am married to now. We live in our home in the Los Feliz area of Los Angeles.

3. Evan and I have shared custody of Jack throughout his life and always in Los Angeles County. When Jack was very young, Evan, Jack, and I lived together in Malibu and then briefly in Sherman Oaks. After we broke up, Evan was in Sherman Oaks for a while and then we each moved to separate homes around Silver Lake and continued to share custody. For approximately the last two years, my home has been in Los Feliz and Evan's in Sherman Oaks. We have shared custody on a week-on/week-off basis, with the exchange typically happening on Fridays when Jack got out of school. Evan sometimes exercised her custodial time with Jack on pre-determined long weekends or school breaks in Nashville, Tennessee where she maintains a second home, but we both regularly exercised custody in Los Angeles.

4. Jack has always been enrolled in school in Los Angeles. He attended preschool in Silver Lake, then kindergarten and first grade at Pilgrim School near Koreatown, and since September 2020 has been enrolled at Children's Community School in Van Nuys. Since the Coronavirus pandemic began in March 2020, his schooling has been online as with most other children, but he remains a student of Children's Community School in Van Nuys. Jack's pediatrician is in Los Angeles. His dentist is in Pasadena. His occupational therapy program is in Los Angeles. His friends are in Los Angeles. His maternal grandmother, Evan's mother, lives in Woodland Hills. His aunt, Evan's sister, lives in Los Angeles.

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1 5. Evan and I are both actors who travel frequently for work. We have sometimes
2 adjusted our custody schedule to accommodate each other's travel. With a few exceptions which I
3 will explain further below, Evan and I were mostly successful at working out a shared custody
4 schedule and changes to accommodate one another's travel and work commitments.

5 6. In 2017, we struggled with some custody issues and I filed a Petition to initiate a
6 parentage action. A true and correct copy of the Petition is attached as Exhibit A. Evan filed a
7 Response on May 4, 2017, a true and correct copy of which is attached as Exhibit B. In her
8 Response, Evan confirmed that I am Jack's father and that Jack lived in Los Angeles County. Evan
9 did not challenge California's jurisdiction although she noted that she resided in Nashville,
10 Tennessee and I believe may have omitted her Los Angeles residence at the time. Although Evan
11 owns property in Nashville, Evan's home has been in Los Angeles since before Jack was born. For
12 approximately the last four years, the majority of Evan's work was in Los Angeles while she was
13 filming the television show Westworld and the film Kajillionaire. I have never lived in Nashville.

14 7. Shortly after filing the Petition and Response in spring of 2017, Evan and I began to
15 work with a co-parenting therapist, Lisa Hacker, MFT, in an effort to avoid litigation. With Lisa
16 Hacker's help, we reached an agreement on a shared custody schedule. We both also agreed to each
17 keep financially supporting Jack during our respective custody periods and to equally divide his
18 major expenses like school tuition. Periodically, we would have additional meetings or calls with
19 Lisa Hacker, but we were able to continue co-parenting without litigation and in January 2020, the
20 Court entered our request to dismiss the 2017 parentage action. A true and correct copy of the
21 Request for Dismissal is attached as Exhibit C.

22 8. I have now filed a new Petition for a parentage action along with this request for
23 custody orders because Evan abruptly stopped following our custody plan and withheld Jack from
24 me beginning in mid-December 2020. It was my year to have Jack over the Christmas and New
25 Years holidays, as Evan had had Jack over this period the previous year and we have alternated
26 holidays each year. I had been working on a film in New Mexico toward the end of 2020. Jack had
27 been with me for two weeks in New Mexico while I prepared for the film. When the more intense
28 photography schedule was set to begin, we planned for Evan to take Jack with the understanding that

FILED 08/29/21 08:42 PM CASE NO. 21STPT00170 RICHARD R. PROKOP, CLERK

1 Jack would be returned to me in Los Angeles once filming was completed. Evan decided to take
2 Jack to Tennessee during this time, but we agreed that Evan would fly with Jack back home to Los
3 Angeles on December 18, 2020 and then I would begin my custodial time with him on December 22,
4 2020 when I returned from working in New Mexico.

5 9. I arrived back home in Los Angeles early on December 19, 2020. It was my
6 assumption that Evan had flown back to Los Angeles on the 18th as was the plan--those assumptions
7 were confirmed after I texted Evan asking if they had arrived ok and she said that they had.
8 However, this was not true. Jack was never put on a plane.

9 10. Not only did Jack not return to my care on the 22nd but Evan had me believe, for
10 four days, that Jack was in California when in fact he was still in Tennessee. During these four days,
11 I was not able to connect with Jack over FaceTime even though I tried every day. I tried contacting
12 Evan's mother because I had grown suspicious of Evan's evasiveness and concerned about Jack's
13 whereabouts, but her mother, sadly, also would not respond and still has not to this day.

14 11. Failing to reach Evan or her mother, I found it necessary to reach out to Evan's
15 assistant to ask if he knew where Jack was. Evan's assistant informed me that Jack was still at
16 Evan's house in Nashville.

17 12. It was only after Evan's assistant had made me aware of this that I received an email
18 from Evan notifying me that her and Jack's safety was at risk due to a high profile criminal
19 investigation she is involved in and that Jack would be "staying in Nashville for the immediate
20 future." A true and correct copy of Evan's December 22, 2020 email is attached as Exhibit D. The
21 email made no sense to me as if Evan was truly in danger, then it seemed logical that Jack would
22 stay with me, not her.

23 13. I was devastated. This news was obviously very shocking and disturbing to hear so
24 suddenly. It was the very first time that I had ever heard Evan mention our son's safety being in
25 jeopardy due to her involvement in a legal case. I also realized that I would not get to spend the
26 holiday with Jack,

27 14. I received a letter from Evan on December 23, 2020 supposedly from law
28 enforcement personnel connected with the investigation. The letter was sent to me through the

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1 messaging app called Signal. I have attached a true and correct copy of the version I was able to
 2 save from the app as Exhibit E. This version shows Evan's name at the top of the post. When I first
 3 received the message, another person's name was at the top of the post, Ilma Gore. Ilma Gore is a
 4 graphic artist who Evan has dated for more than a year. I have seen her at Jack's drop-offs and
 5 birthday parties, and she has been to my home. Evan deleted that post. The letter was not on any
 6 kind of department letterhead and was supposedly from a woman named Michelle Langer of the
 7 "Federal Violent Crimes Department." I googled but found no such department or woman. This
 8 Michelle Langer noted that Evan's and her family's safety was "of the utmost concern," not that
 9 Jack was in danger preventing Evan from returning him to my custody. I called the number for
 10 Michelle Langer on the letter for two days. I finally received a text back from someone saying I had
 11 the wrong number for a different Michelle. This person gave me another number on which I called
 12 and left voicemail. I never heard back.

13 15. I contacted another one of the law enforcement personnel Evan directed me to, a
 14 Sergeant Jeffrey Walker. He informed me that the criminal investigation Evan was involved in had
 15 been going on for quite some time, would likely continue for quite some time, and that it had nothing
 16 to do with our current custody situation. He did not indicate that there was any present danger to our
 17 son. He said the case was now with the FBI and advised me to get legal counsel with respect to
 18 custody issues.

19 16. Evan nonetheless ignored my repeated requests to have my custodial time with Jack
 20 and to go back to Lisa Hacker for assistance. It is my understanding that she ignored Lisa Hacker's
 21 emails to her as well. Evan finally suggested on January 10, 2021 that we mediate with a private
 22 judge but it is my understanding that it often takes weeks or months to get an appointment, and it has
 23 already been nearly a month since I was supposed to have had Jack in Los Angeles. Although she
 24 suggested mediation, Evan did not explain what she was hoping to accomplish. The only thing that
 25 was clear was that she had no intention of giving me my custody time with Jack any time soon. A
 26 true and correct copy of her January 10, 2021 email is attached as Exhibit F.

27 17. On January 12, 2021, I told Evan I would participate with her in mediation with a
 28 private judge but that mediation needed to happen quickly. A true and correct copy of my January

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1 12, 2021 email to Evan is attached as Exhibit G. But I fear that Evan is merely stalling again and I
2 am filing this request with the Court in the event that we do not resolve this in mediation.

3 18. I frankly do not understand what is happening. Either Evan's claims that she is
4 receiving "death threats" are true and Jack is not safe in her care, or they are not true and she is
5 withholding our son from me for other reasons of her own invention. As an actor myself, I am no
6 stranger to threats, and many people I know who are public figures have had to take security
7 precautions. I have received no indication from Evan that she has even a security guard in place.

8 19. I am extremely concerned about Evan's judgment right now either way, and I miss
9 Jack deeply and remain worried for his safety and wellbeing. I feel compelled to file this request for
10 custody orders given Evan's withholding of Jack from me. I am asking this Court to make custody
11 orders consistent with our status quo such that Evan and I alternate custody of Jack in Los Angeles
12 every other week and alternate major holidays each year as well.

13
14 I declare under penalty of perjury under the laws of the State of California that the foregoing
15 is true and correct.

16 Executed this 22nd day of January, 2021, at Los Angeles, California.

17
18 
19 _____
20 ANDREW JAMES MATTFIN-BELL

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FILED 2021 JAN 22 10 33 AM IN CLERK'S OFFICE OF THE CLERK OF THE SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

11/11/11

EXHIBIT E

EEHEED092012 035A2 PWC6A5E1AC2 192264R10nsatRRR06061C16rk



EXHIBIT F

EE#EED0002872 1005:42 PM CASSENO:202204 Richard R. Reister, Clerk

COPY

EXHIBIT 7

EFILED 03/29/21 05:42 PM CASE NO. 21D284 Richard R. Rooker, Clerk

From: Lisa Hacker <lisa@hackerfamilyresolution.com>
Date: December 22, 2020 at 4:10:46 PM PST
To: James Bell [REDACTED], Evan Bell Wood
[REDACTED]
Subject: Re: Appointment

Hello Jamie and Evan,

Just following up to see if you would like to schedule a time to speak with Lisa tonight. She is in session until 7:00PM but happy to speak afterwards. If tomorrow morning works better, she is available as early as needed.

Thank you,
Melissa

Please note my new email address: lisa@hackerfamilyresolution.com

If you would like to schedule an appointment, please contact my assistant,

Melissa at melissa@hackerfamilyresolution.com

The information in this email message may contain therapist-client privileged and confidential information intended only for the use of the individual or entity name above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver to the intended recipient you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify me immediately by telephone at 818-501-8711. Thank you

From: Jamie Bell [REDACTED] >
Date: Tuesday, December 22, 2020 at 2:12 PM
To: Lisa Hacker <lisa@hackerfamilyresolution.com>
Cc: Evan Bell Wood [REDACTED] >
Subject: Re: Appointment

Thanks Melissa,

I am available tonight and tomorrow and can make both work.

Thank you

Jamie

On Dec 22, 2020, at 12:10 PM, Lisa Hacker
<lisa@hackerfamilyresolution.com> wrote:

Hello Jamie and Evan,

I am happy to help coordinate a time to speak with Lisa. She can be available at the following times, please let me know what works best.

Today, Tuesday, December 22nd at 7:00PM

EFILED 03/29/21 05:42 PM CASE NO. 21D284 Richard R. Rooker, Clerk

COPY

Tomorrow, Wednesday, December 23rd at 8:00AM or
8:30AM

Thank you,
Melissa

Please note my new email address:
lisa@hackerfamilyresolution.com

If you would like to schedule an appointment, please contact
my assistant, Melissa at
melissa@hackerfamilyresolution.com

The information in this email message may contain
therapist-client privileged and confidential information
intended only for the use of the individual or entity name
above. If the reader of this message is not the intended
recipient, or the employee or agent responsible to deliver to
the intended recipient you are hereby notified that any
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is strictly prohibited. If you have received this
communication in error, please notify me immediately by
telephone at 818-501-8711. Thank you

EFILED 03/29/21 05:42 PM CASE NO. 21D284 Richard R. Rooker, Clerk

From: James Bell [REDACTED]
Date: December 22, 2020 at 12:07:01 PM PST
To: Lenore Pink [REDACTED]
Subject: Re:

Hi

It's important to me that we connect with Lisa Hacker to discuss how things will work moving forward and establish a plan of action.

She is available this evening and willing to speak with us.

I'm reaching out to her office on our behalf to set it up.

J

On Dec 22, 2020, at 10:22 AM, Lenore Pink [REDACTED] wrote:

Dear Jamie,

I am writing this email to you to let you know that Jack and I will be staying in Nashville for the immediate future. As you will soon find out, I am a material witness in a high profile criminal investigation which likely will be public in the near future. I have been advised that both Jack and my safety is at risk and that it is in our best interests to remain in Nashville. I will forward to you my contact at the FBI and you should feel free to call with whatever questions you have.

COPY

I know how difficult this is for you to be away from Jack for an extended period of time. I will do whatever I can to accommodate you should you want to come here to visit him whenever you want. I of course will facilitate FaceTime with Jack on a frequent basis. I am available to answer any questions you may have. Thank you for your understanding during this very difficult time.

-Shine on-

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From: James Bell [REDACTED] >
Date: December 24, 2020 at 9:34:38 AM PST
To: Lenore Pink [REDACTED] >
Subject: Re: Michelle Langer

I have left word with Michelle and am awaiting her response. I have also left word with Amanda and Guillermo.

I will see if Lisa is available to jump on a phone call, although I'm sure it's very tricky now as we're so close to the holiday. We may have lost her.

On Dec 24, 2020, at 9:09 AM, Lenore Pink
[REDACTED] > wrote:

I see. Not sure what happened then. You'll have to ask Michelle when you reach her.

In the meantime, I am a phone call away and can tell you what I can, should you have any pressing questions.

-Shine on-

On Dec 23, 2020, at 8:01 PM, James Bell
[REDACTED] > wrote:

EFILED 03/29/21 05:42 PM CASE NO. 21D284 Richard R. Rooker, Clerk

The number beneath Michelle's signature on the letter you sent belongs to a different Michelle.

That person reached out to me personally informing me that I had been issued the wrong number for Michelle Langer.

I was given a new number and have left a voicemail. I am awaiting her to return my call.

On Dec 23, 2020, at 5:55 PM,
Lenore Pink

[REDACTED] >
wrote:

If the number Michelle put on her official letter isn't reaching her, then I would assume the other number is also correct.

I also signaled you another number.

-Shine on-

On Dec 23, 2020,
at 7:03 PM, James
Bell

< [REDACTED] >
wrote:

Evan

It appears I have been calling

the incorrect number for two days.

The person who owns the number you gave me for Michelle has since reached out via text message and has issued me with a new number.

<image0.jpeg>

Can you please now confirm that this is in fact the correct number for Michelle Langer?

J

From: James Bell [REDACTED] >
Date: December 29, 2020 at 12:23:49 PM PST
To: Evan Rachel Wood [REDACTED]

Evan,

I hope you guys enjoyed your Christmas.

It was sad for me not having him here as I had expected. As we, so far, have successfully alternated the holiday period every year with him, it really is something I cherish and look forward to and having the plan upended and so suddenly changed was very difficult.

I'm reaching out once again to ask if you will get on the phone with Lisa Hacker and I to discuss the schedule in terms of Jack's care. It's important to me that we quickly come up with a plan for his return to Los Angeles and to my care as it's now been several weeks since I have seen him.

Obviously I'm factoring in the busy holiday travel period, and to be on the safe side, we should likely wait for it to die down a little. More people are traveling during this pandemic than anyone anticipated, and reducing his risk of exposure should remain our top priority.

I will be reaching out to Lisa's office to see if they are back in operation after the holiday and if there is a time that works for us both in the coming days.




I sincerely hope you're agreeable this time.

Jamie

EXHIBIT B

@illmagore

Artist, 2D/3D designer, Jr. software developer. For inquires and complaints please email

 Los Angeles  foundation.app/illmagore
 Joined April 2012

661 Following **3,939** Followers

Not followed by anyone you're following

Tweets

Tweets & replies

Media

Likes



Illma Gore  @illmagore · 3h 

Obviously, my art and my life have long been magnets for controversy, but these recent claims about me are horrible distortions of reality

 28

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Illma Gore  @illmagore · 3h 

Before publishing images be aware that photos and images from my hard drives have been registered with U.S. Copyright office. This documentation names me as the rightful copyright owner. I have not nor will give permission to use them.

 25


 11


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Illma Gore  @illmagore · 3h 

Bring it the fuck on you rapist pedophile motherfucker

 45

 10

 26



Who to follow



WITNESS ES
@witness_es


Follow



EXHIBIT C



Illma Gore



Oct 14, 2020



Michelle



9:25 PM

[Invite to WhatsApp](#)

Hey! This is the contact to the investigation for you to leave a message. She will direct you to the right person

9:26 PM

She probably won't answer but leave a message

9:26 PM

Hope you haven't been spammed too much lately

9:26 PM

Thanks! I will call her tomorrow and leave a





Illma Gore



Dec 22, 2020

I just received 2 voicemails on my cell just now looking for Michelle Langer. Shawn Holley called saying she represents Evan and Jamie Bell called saying he's the father of Jack Bell. I haven't returned the calls to tell them they have the wrong person. Do you want me to call them or can you and Evan sort it out on your end?

10:59 AM ✓✓

Don't respond I'll have it fixed immdelty

11:31 AM

Sorry for that. Someone got the numbers mixed up

11:31 AM



EXHIBIT D



Illma Gore

illmagore



September 30, 2020

Hey! This is random and completely uncalled for but my name is Illma, I'm a friend of Evan Rachel Wood and I help run the Phoenix Act. I just wanted to reach out and say there is a group of survivors of violence here with similar experiences. And if for whatever reason you ever wanted to talk about what I do for Phoenix or even just touch base to be connected to everyone else at the very least. Know that you can at any point.

Best,
Illma





Illma Gore
illmagore



October 03, 2020

I'll be really candid with you. I run Phoenix alongside Evan Rachel Wood. We ran into lots of teenagers being groomed by adults in the music industry.

Evan, ex staff and other speak about the groupie video.

We know it isn't released because the girl was underage. And the content that is in it horrifies people.

I don't think it's right for it to be shown to people and it still is.

I believe it is Jeanette in



Illma Gore

illmagore



I believe it is Jeanette in the video.

But I can only tell by the index finger rings and bracelets.

FBI got involved & we've been working with them. Because unfortunately there were many more teens subjected to abuse.

But mainly, I found sistinas livejournal of you, Jeanette and Alison.

I know the police pulled them out of the band situation in NY at some point.

And I know it's probably



Illma Gore

illmagore



And I know it's probably very weird to read about this from a complete stranger but I felt compelled to check in because of the abuse suffered from other teenagers.

And that there's a group here. If you ever wanted that.

But there's no pressure to be involved in anyway

And I recognize this must be a hard message to read



EXHIBIT E

Jackson Trugman

From: Katherine T. Kleindienst <KKleindienst@kwikhlaw.com>
Sent: Wednesday, July 20, 2022 10:39 AM
To: Jackson Trugman; Maggie Ziemianek; Michael J. Kump; Thomas Rivera; Lawrence M. Cirelli; Shawn Holley
Cc: Howard King; John Snow; Karen Sloane
Subject: RE: [EXTERNAL] Re: Evan Rachel Wood

Hi Jackson,

We intend to oppose Plaintiff's *ex parte* application, motion for discovery, and request to continue the August 18 hearing.

Best,
Kat

Katherine T. Kleindienst
[Kinsella Weitzman Iser Kump Holley LLP](#)
808 Wilshire Boulevard, Third Floor
Santa Monica, California 90401
Direct Dial: 310.566.9841
Email: kkleindienst@kwikhlaw.com

From: Jackson Trugman <jtrugman@khpslaw.com>
Sent: Wednesday, July 20, 2022 9:28 AM
To: Maggie Ziemianek <MZiemianek@hansonbridgett.com>; Michael J. Kump <MKump@kwikhlaw.com>; Thomas Rivera <TRivera@hansonbridgett.com>; Lawrence M. Cirelli <lcirelli@hansonbridgett.com>; Shawn Holley <SHolley@kwikhlaw.com>; Katherine T. Kleindienst <KKleindienst@kwikhlaw.com>
Cc: Howard King <hking@khpslaw.com>; John Snow <JSnow@khpslaw.com>; Karen Sloane <ksloane@khpslaw.com>
Subject: RE: [EXTERNAL] Re: Evan Rachel Wood

Dear Counsel:

Following up on prior emails and conversations, Plaintiff Brian Warner hereby gives notices that he intends to appear *ex parte* on Friday July 22, at 8:30 am in Department 50. Mr. Warner will seek an order shortening time on a concurrently filed motion to conduct limited discovery pursuant to Code of Civil Procedure Section 425.16(g) and request for a continuance of Defendants' motions to strike to permit such limited discovery.

The *ex parte* application will be made on grounds including that were the motion to be heard on regular notice, the requested discovery could not be obtained until after Mr. Warner's opposition was already due. In the alternative Mr. Warner will ask that if the court is not inclined to hear the motion on shortened time, that it continue the motion to strike hearings accordingly.

The discovery motion seeks leave to take the following depositions: (1) third party Agent Michelle Langer, (2) Defendant Gore, (3) Defendant Wood, (4) third party Michele Meyer, and (5) third party Kathryn McGaffigan. Good cause exists to conduct limited discovery, including because Defendants each filed a Special Motion to Strike pursuant to Code of Civil Procedure Section 425.16(b); Defendants contend that in opposing these motions, Mr. Warner will be required to (but cannot) make a *prima facie* showing of the causes

of action challenged in their motions; the discovery sought is necessary to allow Mr. Warner to make a *prima facie* showing of the causes of action challenged in Defendants' motions; the information sought by Mr. Warner is in the control of persons from who discovery is sought; the discovery requested is narrowly tailored to obtain the necessary information; and the request is timely. Given the discovery sought, Mr. Warner will request that the Court continue Defendants' motions for a reasonable time period to allow sufficient time to conduct the limited discovery requested before Mr. Warner's opposition is due.

Although I think your prior emails make this clear, please confirm whether Defendants intend to oppose the *ex parte* application, motion, and scheduling request. If you wish to discuss further by telephone, we are available today until 12 pm, and between 3 pm and 6 pm. Otherwise, we will serve you with copies of the papers when they are ready to file.

Best regards,

Jackson S. Trugman, Esq. | JTrugman@khpslaw.com
King, Holmes, Paterno & Soriano, LLP
direct: 310.282.8955

From: Maggie Ziemianek <MZiemianek@hansonbridgett.com>
Sent: Monday, July 18, 2022 10:07 AM
To: Jackson Trugman <jtrugman@khpslaw.com>
Cc: Michael J. Kump <MKump@kwikhlaw.com>; Howard King <hking@khpslaw.com>; John Snow <JSnow@khpslaw.com>; Shawn Holley <SHolley@kwikhlaw.com>; Thomas Rivera <TRivera@hansonbridgett.com>; Katherine T. Kleindienst <KKleindienst@kwikhlaw.com>; Lawrence M. Cirelli <lcirelli@hansonbridgett.com>
Subject: RE: [EXTERNAL] Re: Evan Rachel Wood

Jackson,

Sorry for the delay- I have been traveling.

We will also oppose the motion to lift the discovery date, any related ex parte, any effort to depose Ms. Gore prior to the hearings, and any motion to continue the hearing date on our motion.

I will be on a plane all day today, and will not have reliable wifi, so please copy my colleagues on any correspondence. Please note that I have a hearing at 9am on Wednesday so would prefer that you not set any ex parte hearing that morning if possible.

Thanks,
Maggie

From: Jackson Trugman <jtrugman@khpslaw.com>
Date: Monday, Jul 18, 2022, 10:46 AM
To: Katherine T. Kleindienst <KKleindienst@kwikhlaw.com>
Cc: Michael J. Kump <MKump@kwikhlaw.com>, Howard King <hking@khpslaw.com>, John Snow <JSnow@khpslaw.com>, Shawn Holley <SHolley@kwikhlaw.com>, Maggie Ziemianek <MZiemianek@hansonbridgett.com>
Subject: [EXTERNAL] Re: Evan Rachel Wood

EXTERNAL: Use caution when opening attachments, links or responding to this e-mail.

Thank you Kat.

On Jul 18, 2022, at 7:26 AM, Katherine T. Kleindienst <KKleindienst@kwikhlaw.com> wrote:

Jackson,

We will oppose Plaintiff's motion for discovery and will oppose any request to continue the August 18 hearing date. We will also oppose any ex parte application to shorten time on a noticed motion to lift the discovery stay. To the extent Plaintiff files such an ex parte application, please inform the Court that (1) Ms. Wood opposes Plaintiff's request and (2) will file a written opposition explaining her position prior to the hearing.

Best,
Kat

Katherine T. Kleindienst
Kinsella Weitzman Iser Kump Holley LLP
808 Wilshire Boulevard, Third Floor
Santa Monica, California 90401
Direct Dial: 310.566.9841
Email: kkleindienst@kwikhlaw.com

From: Jackson Trugman <jtrugman@khpslaw.com>
Sent: Saturday, July 16, 2022 3:59 PM
To: Michael J. Kump <MKump@kwikhlaw.com>; Katherine T. Kleindienst <KKleindienst@kwikhlaw.com>
Cc: Howard King <hking@khpslaw.com>; John Snow <JSnow@khpslaw.com>; Shawn Holley <SHolley@kwikhlaw.com>
Subject: Evan Rachel Wood

****CAUTION: This email originated from outside of the organization.****

Michael and Kat,

As discussed at and in advance of the July 6 CMC, Mr. Warner will be seeking an order to lift the discovery stay including to allow a deposition of Evan Rachel Wood. Could you please check with your client and let us know (1) whether Ms. Wood will sit for a deposition before August 5, and (2) what dates she is available to sit for a deposition before August 5? We also intend to ask the court to continue the motion hearings so as to allow for a more feasible schedule to complete discovery, but the court may ask us to proceed anyway. If you will oppose such a continuance request, please let me know.

Thanks for your cooperation and courtesy as always.

Jackson S. Trugman, Esq. | JTrugman@khpslaw.com
King, Holmes, Paterno & Soriano, LLP
1900 Ave of the Stars, 25th Floor, Los Angeles, CA 90067
direct: 310.282.8955 | fax: 310.282.8903
www.khpslaw.com

Jackson Trugman

From: Jackson Trugman
Sent: Saturday, July 16, 2022 4:00 PM
To: Maggie Ziemianek
Cc: Howard King; John Snow; lcirelli@hansonbridgett.com; trivera@hansonbridgett.com
Subject: RE: Illma Gore

Follow Up Flag: Follow up
Flag Status: Flagged

Maggie: I got an out of office response through 7/18, so I am copying your colleagues.

Thank you.

Jackson S. Trugman, Esq. | JTrugman@khpslaw.com

King, Holmes, Paterno & Soriano, LLP

direct: 310.282.8955

From: Jackson Trugman
Sent: Saturday, July 16, 2022 3:57 PM
To: Maggie Ziemianek <MZiemianek@hansonbridgett.com>
Cc: Howard King <hking@khpslaw.com>; John Snow <JSnow@khpslaw.com>
Subject: Illma Gore

Maggie,

As discussed at and in advance of the July 6 CMC, Mr. Warner will be seeking an order to lift the discovery stay including to allow a deposition of Illma Gore. Could you please check with your client and let us know (1) whether Ms. Gore will sit for a deposition before August 5, and (2) what dates she is available to sit for a deposition before August 5? We also intend to ask the court to continue the motion hearings so as to allow for a more feasible schedule to complete discovery, but the court may ask us to proceed anyway. If you will oppose such a continuance request, please let me know.

Thanks for your cooperation and courtesy as always.

Jackson S. Trugman, Esq. | JTrugman@khpslaw.com

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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 15, 2022, I served true copies of the following document(s) described as **DECLARATION OF HOWARD E. KING** 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 15, 2022, at Los Angeles, California.

/s/ Eniko Weinberger

Eniko Weinberger

