

1 ADAM B. WOLF (Bar No. 215914)
MELISA A. ROSADINI-KNOTT (Bar No. 316369)
2 PEIFFER WOLF CARR KANE CONWAY & WISE, LLP
3 3435 Wilshire Boulevard, Suite 1400
Los Angeles, CA 90010
4 Telephone: (415) 766-3545
Facsimile: (415) 840-9435
5 Email: awolf@peifferwolf.com
Email: mrosadini@peifferwolf.com
6

Electronically FILED by
Superior Court of California,
County of Los Angeles
9/18/2023 11:48 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By S. Tresvant, Deputy Clerk

7 BRIAN J. PERKINS (Bar No. 315870)
PEIFFER WOLF CARR KANE CONWAY & WISE, LLP
8 555 Montgomery Street, Suite 820
San Francisco, CA 94111
9 Telephone: (312) 374-8261
Facsimile: (415) 840-9435
10 Email: bperkins@peifferwolf.com

11 *Attorneys for Plaintiffs*

12
13 SUPERIOR COURT OF THE STATE OF CALIFORNIA
14 COUNTY OF LOS ANGELES

15 JANE DOE,

16 Plaintiff,

17 v.

18 BRIAN WARNER a.k.a. MARILYN
19 MANSON,

20 Defendant.

Case No. 21STCV20202

[Assigned for All Purposes to: Hon. Gregory
Keosian, Dept. 61]

**PLAINTIFF'S NOTICE OF MOTION
AND MOTION *IN LIMINE* NO. 6 TO
PRECLUDE CHRIS VRENNA FROM
TESTIFYING AT TRIAL;
MEMORANDUM OF POINTS AND
AUTHORITIES; DECLARATION OF
ADAM B. WOLF**

Date: October 3, 2023

Time: 9:00 a.m.

Dept.: 61

Complaint Filed: May 28, 2021

FAC Filed: September 23, 2021

Trial Date: October 3, 2023

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

TO THE COURT, AND TO DEFENDANT AND HIS ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on October 3, 2023 at 9:00 a.m. in Department 61 of the above-referenced court located at 111 North Hill Street, Los Angeles, California 90012, or as soon thereafter as this matter may be heard, Plaintiff JANE DOE (“Plaintiff” or “Ms. Doe”) will and hereby does move for an order *in limine* precluding Chris Vrenna from testifying at trial in this action.

This Motion is made pursuant to Evidence Code sections 350, 352, 1101, and Los Angeles Superior Court Rule 3.57, and on the grounds that Mr. Vrenna was an improperly late-disclosed witness, his testimony is irrelevant to the subject matters of this trial, is duplicative, and would be prejudicial, a waste of time, and would mislead the jury.

Plaintiff met and conferred with counsel for Defendant, pursuant to Local Rule 3.57, to discuss the subject matter of this motion and were unable to resolve the issues in dispute.

This Motion is based on this Notice of Motion; the accompanying Memorandum of Points and Authorities; Declaration of Adam B. Wolf; Plaintiff’s Notice of Motion and Motion for Evidence Sanctions; the records, pleadings, and files of the Court in this action; and all other matters as may be presented to the Court at the time of the hearing.

DATED: September 18, 2023

PEIFFER WOLF CARR KANE CONWAY &
WISE, LLP



By: _____
ADAM B. WOLF
BRIAN J. PERKINS
MELISA A. ROSADINI-KNOTT

Attorneys for Plaintiff

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. INTRODUCTION AND BRIEF FACTUAL BACKGROUND**

3 Defendant Brian Warner seeks to call Chris Vrenna as a witness at trial. The claimed need
4 for his testimony is that (1) he was in a video entitled “Groupie,” even though Plaintiff would
5 stipulate to that; and that (2) he can describe the layout of Defendant’s apartment and would
6 discuss the purported difference between “Marilyn Manson’s persona” and “Brian Warner’s
7 persona,” even though Defendant refused to name him (or others) as a witness with knowledge of
8 the claims or defenses in this case until 12 days before the discovery cut-off—a point at which it
9 was far too late to depose him. Defendant’s gamesmanship should not be rewarded.

10 During their relationship, one of the instances of Mr. Warner’s mental and emotional abuse
11 came in the form of showing Plaintiff a video entitled “Groupie”. It is irrelevant that Mr. Vrenna
12 was in the video. But to the extent this is relevant, Plaintiff would stipulate to this fact. There is no
13 need for Mr. Vrenna to testify to this.

14 Moreover, as discussed in detail in the pending evidence-sanction motion, Defendant
15 refused to name Mr. White as a witness who could testify about the claims and defenses in this
16 case—instead, clinging to his Fifth Amendment privilege. Defendant then reversed course,
17 revoked his Fifth Amendment responses, and named Mr. Vrenna as a witness on the claims and
18 defenses in this case only 12 days before the discovery cut-off date. By that time, it was too late
19 for Plaintiff to depose Mr. Vrenna. Plaintiff would be greatly prejudiced by his testimony at trial.

20 **II. MR. VRENNA’S TESTIMONY SHOULD BE EXCLUDED BECAUSE**
21 **DEFENDANT IMPROPERLY REFUSED TO DISCLOSE MR. VRENNA**
22 **UNTIL THE LAST MINUTE**

23 As detailed in Plaintiff’s Motion for Evidence Sanctions and Plaintiff’s Motion in Limine
24 No. 2, which are incorporated here by reference, Defendant improperly refused to identify
25 witnesses or persons with knowledge of the facts, claims, and defenses in this case until the
26 eleventh hour, leaving Plaintiff no time to depose these witnesses, including Mr. Vrenna. For that
27 reason alone, addressed in the above-referenced motions, Mr. Vrenna’s testimony should be
28 excluded.

1 **III. MR. VRENNA’S TESTIMONY THAT HE APPEARED IN THE**
2 **“GROUPIE” VIDEO OR THAT THE VIDEO WAS STAGED IS**
3 **IRRELEVANT**

4 Evidence Code section 350 states that “[n]o evidence is admissible except relevant
5 evidence.” Whether or not the “Groupie” video was staged or not is wholly irrelevant to the issues
6 in this case and more specifically, the horrific fear and reaction it caused Plaintiff when Defendant
7 forced her to watch the video. It is irrelevant whether Mr. Vrenna (or any others) consented to
8 take part in the “Groupie” video or whether it was staged because Plaintiff was not made aware of
9 that by Defendant before he showed her the video.


10 Further, Mr. Vrenna’s testimony about the “persona” of Marilyn Manson (as opposed to
11 the same person, Brian Warner) is irrelevant to the issues for the jury to decide regarding the
12 sexual assault and abuse by Defendant against Plaintiff.

13 **IV. CONCLUSION**

14 For the reasons set forth above, Plaintiff respectfully requests that the Court preclude Chris
15 Vrenna from testifying at trial in this action.

16
17 DATED: September 18, 2023

PEIFFER WOLF CARR KANE CONWAY &
WISE, LLP



18
19
20 By: _____

ADAM B. WOLF
BRIAN J. PERKINS
MELISA A. ROSADINI-KNOTT

Attorneys for Plaintiff

1 **DECLARATION OF ADAM B. WOLF**

2 I, ADAM B. WOLF, declare as follows:

3 1. I am a partner at Peiffer Wolf Carr Kane Conway & Wise, LLP, counsel of record
4 for Plaintiff Jane Doe (“Plaintiff”). I make this declaration pursuant to Los Angeles County
5 Superior Court Rule 3.57 and in support of Plaintiff’s Motion in Limine No. 6 to Preclude Chris
6 Vrenna from Testifying at Trial. This declaration is based on personal knowledge unless
7 otherwise noted, and if called to testify on such matters, could and would competently testify.

8 2. Plaintiff seeks to preclude defense witness, Chris Vrenna, from testifying at trial,
9 and Plaintiff would be prejudiced if the Court permits Mr. Vrenna to testify as detailed in this
10 motion because Mr. Vrenna’s proposed scope of testimony is irrelevant to the subject matters of
11 this trial, improper character evidence, and would be prejudicial, duplicative, a waste of time, and
12 would mislead the jury.

13 3. I met and conferred with counsel for Defendant, Howard King, John Snow, and
14 Jackson Trugman, on September 14, 2023 regarding the substance of this motion. Counsel for
15 Defendant would not agree to my proposed stipulation that I proposed, specifically that
16 Defendant’s position was that the “Groupie” video had been staged. We were unable to reach an
17 agreement on the issues presented in this motion.

18
19 I declare under penalty of perjury under the laws of the State of California that the
20 foregoing is true and correct. Executed on this 18th day of September 2023 in Los Angeles,
21 California.

22 

23 _____
24 ADAM B. WOLF

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SERVICE LIST
Doe v. Warner
Case No. 21STCV20202

Attorneys for Defendant,
Brian Warner a.k.a. Marilyn Manson

Howard E. King, Esq.
John G. Snow, Esq.
Jackson S. Trugman, Esq.
Karen Sloane
Johanna Salazar
King, Holmes, Paterno & Soriano, LLP
1900 Avenue of the Stars, 25th Floor
Los Angeles, CA 90067
hking@khpslaw.com
jsnow@khpslaw.com
jtrugman@khpslaw.com
ksloane@khpslaw.com
jsalazar@khpslaw.com

JUSTICEFORMARILYNMANSON.COM