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17 Attorneys for Defendant, BRIAN WARNER

18 SUPERIOR COURT OF THE STATE OF CALIFORNIA

19 COUNTY OF LOS ANGELES, CENTRAL DISTRICT

20 JANE DOE,

21 Plaintiff,

22 vs.

23 BRIAN WARNER, a.k.a. MARILYN
MANSON,

24 Defendant.
25
26

CASE NO. 21STCV20202

JOINT TRIAL EXHIBIT LIST

The Hon. Gregory Keosian, Dept. 61

Trial Date: October 3, 2023

Time: 10:00 a.m.

Los Angeles Superior Court
Stanley Mosk Courthouse
111 N. Hill Street
Los Angeles, CA 90014

Action Filed: May 28, 2021

Pursuant to Los Angeles Superior Court Rules 3.49, 3.53, and 3.151, Plaintiff Jane Doe (“Plaintiff”) and Defendant Brian Warner (“Defendant”) submit the following list of exhibits they presently intend to offer at trial. The Parties reserve the right to modify and/or supplement this list as necessary or appropriate.

DEFENDANT’S EXHIBITS

Ex.	Description	Offered By	Objection	Date Identified	Date Admitted
1.	September 22, 2021 First Amended Complaint for Damages. [Plaintiff’s Dep. Exh.1]	Defendant			
2.	September 29, 2020 screenshot with list of names. [Plaintiff’s Dep. Exh.2, Confidential]	Defendant	Evid. Code §§ 350, 352, 403, 702		
3.	Undated checklists. [Plaintiff’s Dep. Exh.3]	Defendant	Evid. Code §§ 350, 352, 403, 702, 1200		
4.	Undated photograph of apartment keys. [Plaintiff’s Dep. Exh.4, DOE_000619]	Defendant			
5.	June 15, 2011 email from Plaintiff to Brian Warner. [Plaintiff’s Dep. Exh.5, BW000136-147]	Defendant	Evid. Code §§ 350, 352, 1106, 1400		
6.	February 27, 2011 to October 27, 2011 text message exchange between Plaintiff and Brian Warner. [Plaintiff’s Dep. Exh.6, DOE_000636-642]	Defendant	Evid. Code § 1106		
7.	June 15, 2011 through July 23, 2011 text message exchange between Plaintiff and Brian Warner. [Plaintiff’s Dep. Exh.7, DOE_000638-639]	Defendant	Evid. Code § 356		

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Ex.	Description	Offered By	Objection	Date Identified	Date Admitted
8.	August 29, 2011 Plaintiff's Instagram posts and photographs with Billy Zane and Jon Hamm at Born Villain screening at Silent Movie Theater in Los Angeles. [Plaintiff's Dep. Exh.8, DOE_000643-644]	Defendant	Evid. Code § 350		
9.	Photographs of Plaintiff with Billy Zane and Jon Hamm at Born Villain screening at Silent Movie Theater in Los Angeles on 8/28/2021. [Plaintiff's Dep. Exh.9, DOE_000621-622]	Defendant	Evid. Code § 350		
10.	September 15, 2020 Instagram message between Evan Rachel Wood and Plaintiff. [Plaintiff's Dep. Exh.10, DOE_000118-121]	Defendant	Evid. Code §§ 350, 352, 1200		
11.	February 1, 2021 to February 5, 2021 Instagram message exchange between Sarah McNeilly and Plaintiff. [Plaintiff's Dep. Exh.11, DOE_000211-212 and DOE_000221]	Defendant	Evid. Code §§ 350, 352, 1200		
12.	February 2, 2021 Instagram message exchange between Sarah McNeilly and Plaintiff. [Plaintiff's Dep. Exh.12, DOE_000237]	Defendant	Evid. Code §§ 350, 352, 1200		
13.	February 2, 2021 Instagram message exchange between Ashley Walters and Plaintiff. [Plaintiff's Dep. Exh.11, DOE_000001-000003]	Defendant	Evid. Code §§ 350, 352, 1200		
14.	Plaintiff's Instagram post. [Plaintiff's Dep. Exh.14, DOE_000334]	Defendant			

Ex.	Description	Offered By	Objection	Date Identified	Date Admitted
15.	February 3, 2021 text message exchange between Ashley Walters and Plaintiff. [Plaintiff's Dep. Exh.15, DOE_000009-10]	Defendant	Evid. Code §§ 350, 352, 1200		
16.	February 4, 2021 text message exchange between Ashley Walters and Plaintiff. [Plaintiff's Dep. Exh.16, DOE_000019-20, DOE_0000022, and DOE_000027]	Defendant	Evid. Code §§ 350, 352, 356, 1200, 1400-1402		
17.	February 4, 2021 text message exchange between Ashley Walters and Plaintiff. [Plaintiff's Dep. Exh.17, DOE_000034-36, DOE_000040-41, and DOE_000046]	Defendant	Evid. Code §§ 350, 352, 356, 1200, 1400-1402		
18.	February 6, 2021 Instagram message exchange between Plaintiff and Ralph Gardner. [Plaintiff's Dep. Exh.19, DOE_000577-36]	Defendant	Evid. Code §§ 350, 352, 1200		
19.	February 7, 2021 Instagram message exchange between Plaintiff and Ralph Gardner. [Plaintiff's Dep. Exh.20, DOE_000578; DOE_000583; DOE_000585 and DOE_000587]	Defendant	Evid. Code §§ 350, 352, 356, 1200, 1400-1402		
20.	February 11 Instagram message exchange between Evan Rachel Wood and Plaintiff. [Plaintiff's Dep. Exh.21, DOE_000151-154; DOE_000158]	Defendant	Evid. Code §§ 350, 352, 356, 1200, 1400-1402		
21.	October 18, 2017 Twitter post regarding #MeToo campaign. [Plaintiff's Dep. Exh.22, DOE_000514]	Defendant	Evid. Code §§ 350, 352, 1200, 1400		

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Ex.	Description	Offered By	Objection	Date Identified	Date Admitted
22.	December 3, 2021 notes for counseling contacts/ therapy session regarding Plaintiff. [Plaintiff's Dep. Exh.23, DOE_000760]	Defendant	Evid. Code §§ 350, 352, 917(a)		
23.	December 17, 2021 notes for counseling contacts/ therapy session regarding Plaintiff. [Plaintiff's Dep. Exh.24, DOE_000764]	Defendant	Evid. Code §§ 350, 352, 917(a)		
24.	January 28, 2022 notes for counseling contacts/ therapy session regarding Plaintiff. [Plaintiff's Dep. Exh.25, DOE_000768]	Defendant	Evid. Code §§ 350, 352, 917(a)		
25.	April 29, 2022 notes for counseling contacts/ therapy session regarding Plaintiff. [Plaintiff's Dep. Exh.26, DOE_000785]	Defendant	Evid. Code §§ 350, 352, 917(a)		
26.	May 20, 2022 notes for counseling contacts/ therapy session regarding Plaintiff. [Plaintiff's Dep. Exh.27, DOE_000786]	Defendant	Evid. Code §§ 350, 352, 917(a)		
27.	Screenshot from video file of September 2017 book signing event. [BW000151]	Defendant	Evid. Code §§ 350, 352, 1400		
28.	Video file of Brian Warner in-studio recording at his apartment. [BW000152, Confidential]	Defendant	Evid. Code §§ 350, 352, 1400		
29.	July 12, 2018 VICE interview with Plaintiff. [Vice.com Link: https://www.vice.com/en/article/wkzak/chloe-black-spaceman-track-premiere-interview-2018]	Defendant	Evid. Code §§ 350, 352, 1200, 1400		

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Ex.	Description	Offered By	Objection	Date Identified	Date Admitted
30.	July 12, 2018 Plaintiff's 'Spaceman' video file. [VICE Link: https://www.vice.com/en/article/ywkzak/chloe-black-spaceman-track-premiere-interview-2018 .	Defendant	Evid. Code §§ 350, 352, 1200, 1400		
31.	October 24, 2011 Instagram message exchange. [DOE_000642]	Defendant	Evid. Code §§ 350, 352, 1200		
32.	February 2, 2021 Instagram message exchange between Plaintiff and Ashley Walters. [DOE_000008]	Defendant	Evid. Code §§ 350, 352, 1200		
33.	February 3, 2021 Instagram message exchange between Plaintiff and Evan Rachel Wood. [DOE_000122]	Defendant	Evid. Code §§ 350, 352, 1200		
34.	February 4, 2021 Instagram message exchange between Ashley Walters and Plaintiff. [DOE_000028-33]	Defendant	Evid. Code §§ 350, 352, 1200		
35.	February 5, 2021 Instagram message exchange between Plaintiff and Fred Sablan. [DOE_000181-182, DOE_000189, and DOE_000203,]	Defendant	Evid. Code §§ 350, 352, 356, 1200, 1400		
36.	February 7, 2021 Instagram messages between Evan Rachel Wood and Plaintiff. [DOE_000143]	Defendant	Evid. Code §§ 350, 352, 1200		
37.	February 11, 2021 Instagram messages between Evan Rachel Wood and Plaintiff. [DOE_000174]	Defendant	Evid. Code §§ 350, 352, 1200		

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Ex.	Description	Offered By	Objection	Date Identified	Date Admitted
38.	February 14, 2021 Instagram messages between Esmé Bianco and Plaintiff. [DOE_000100 and DOE_000104]	Defendant	Evid. Code §§ 350, 352, 356, 1200, 1400		
39.	March 10, 2021 Instagram messages between Sarah McNeilly and Plaintiff. [DOE_000233]	Defendant	Evid. Code §§ 350, 352, 1200		
40.	May 28, 2021 Instagram messages between Ashley Walters and Plaintiff. [DOE_00076-79]	Defendant	Evid. Code §§ 350, 352, 1200		
41.	May 29, 2021 Instagram messages between Ashley Walters and Plaintiff. [DOE_00084-89]	Defendant	Evid. Code §§ 350, 352, 1200		
42.	June 8, 2021 Instagram messages between Esmé Bianco and Plaintiff. [DOE_000111]	Defendant	Evid. Code §§ 350, 352, 1200		
43.	March 12, 2013 to May 20, 2013 Barlby Road Surgery notes regarding Plaintiff. [DOE_000319-321]	Defendant	Evid. Code §§ 350, 352, 917(a), 994		
44.	February 28, 2014 to April 1, 2014 Holland Park Surgery Notes regarding Plaintiff. [DOE_000257]	Defendant	Evid. Code §§ 350, 352, 917(a), 994		
45.	April 3, 2014 to September 15, 2014 Holland Park Surgery Notes regarding Plaintiff. [DOE_000258]	Defendant	Evid. Code §§ 350, 352, 917(a), 994		
46.	May 12, 2015 to August 18, 2015 Holland Park Surgery Notes regarding Plaintiff. [DOE_000260]	Defendant	Evid. Code §§ 350, 352, 917(a), 994		

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Ex.	Description	Offered By	Objection	Date Identified	Date Admitted
47.	August 18, 2015 to September 25, 2015 Holland Park Surgery Notes regarding Plaintiff. [DOE_000262-263]	Defendant	Evid. Code §§ 350, 352, 917(a), 994		
48.	April 28, 2016 to May 7, 2016 Holland Park Surgery Notes regarding Plaintiff. [DOE_000264]	Defendant	Evid. Code §§ 350, 352, 917(a), 994		
49.	June 5, 2016 letter from Dr. JM Bache, Holland Park Surgery, regarding Plaintiff. [DOE_000307-308]	Defendant	Evid. Code §§ 350, 352, 917(a), 994		
50.	May 7, 2016 to September 27, 2016 Holland Park Surgery Notes regarding Plaintiff. [DOE_000265]	Defendant	Evid. Code §§ 350, 352, 917(a), 994		
51.	September 22, 2016 letter from Linda Vlasaku, Mental Health to Holland Park Surgery, regarding Plaintiff. [DOE_000309]	Defendant	Evid. Code §§ 350, 352, 917(a), 994		
52.	September 29, 2016 to July 14, 2017 Holland Park Surgery Notes regarding Plaintiff. [DOE_000266]	Defendant	Evid. Code §§ 350, 352, 917(a), 994		
53.	September 29, 2016 to August 22, 2018 Holland Park Surgery Notes regarding Plaintiff. [DOE_000266-267]	Defendant	Evid. Code §§ 350, 352, 917(a), 994		
54.	October 28, 2017 Standard Referral Form given to Plaintiff for routine visit to Gynaecology. [DOE_000332]	Defendant	Evid. Code §§ 350, 352, 917(a), 994		

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Ex.	Description	Offered By	Objection	Date Identified	Date Admitted
55.	October 28, 2017 to August 22, 2018 Holland Park Surgery Notes regarding Plaintiff. [DOE_000267-268]	Defendant	Evid. Code §§ 350, 352, 917(a), 994		
56.	August 24, 2018 to January 23, 2019 Holland Park Surgery Notes regarding Plaintiff. [DOE_000270]	Defendant	Evid. Code §§ 350, 352, 917(a), 994		
57.	January 22, 2019 Letter from Demetrios Economides, Consultant Obstetrician & Gynaecologist, regarding Plaintiff. [DOE_000312-313]	Defendant	Evid. Code §§ 350, 352, 917(a), 994		
58.	January 23, 2019 to June 4, 2019 Holland Park Surgery Notes regarding Plaintiff. [DOE_000272]	Defendant	Evid. Code §§ 350, 352, 917(a), 994		
59.	June 4, 2019 to September 1, 2019 Holland Park Surgery Notes regarding Plaintiff. [DOE_000273-274]	Defendant	Evid. Code §§ 350, 352, 917(a), 994		
60.	August 13, 2019 letter from Dr. Ed Collins to Gynaecology Holland Park Surgery regarding Plaintiff. [DOE_000325]	Defendant	Evid. Code §§ 350, 352, 917(a), 994		
61.	March 2, 2020 letter from Dr. C. Domoney, Gynaecology Holland Park Surgery to GP Richard Hooker regarding Plaintiff. [DOE_000318]	Defendant	Evid. Code §§ 350, 352, 917(a), 994		
62.	April 23, 2011 email from Plaintiff to Brian Warner and attached photograph. [BW000126-127]	Defendant	Evid. Code §§ 350, 352		

Ex.	Description	Offered By	Objection	Date Identified	Date Admitted
63.	November 24, 2021 Plaintiff's Responses to Requests for Production of Documents. [14pp.]	Defendant	Evid. Code § 350		
64.	November 24, 2021 Plaintiff's Responses to Form Interrogatories, Set One. [20pp.]	Defendant	Evid. Code § 350		
65.	November 24, 2021 Plaintiff's Responses to Special Interrogatories, Set One. [14pp.]	Defendant	Evid. Code § 350		
66.	February 18, 2022 Plaintiff's Supplemental Responses to Form Interrogatories, Set One. [11pp.]	Defendant	Evid. Code § 350		
67.	February 18, 2022 Plaintiff's Supplemental Responses to Special Interrogatories, Set One. [15 pp.]		Evid. Code § 350		
68.	March 12, 2013 through February 3, 2020 Holland Park Surgery medical records regarding Plaintiff. [DOE000256-DOE000318]	Defendant	Evid. Code §§ 350, 352, 917(a), 994		
69.	March 12, 2013 through May 20, 2013 Barlby Road Surgery medical records regarding Plaintiff. [DOE000319-DOE000324]	Defendant	Evid. Code §§ 350, 352, 917(a), 994		
70.	August 13, 2019 letter from Dr. Ed Collins (Holland Park Surgery) to Gynaecology) regarding Plaintiff. [DOE000325]	Defendant	Evid. Code §§ 350, 352, 917(a), 994		
71.	April 4, 2013 Kensington and Chelsea Primary Care Trust Patient Health questionnaire regarding Plaintiff. [DOE000324]	Defendant	Evid. Code §§ 350, 352, 917(a), 994		

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Ex.	Description	Offered By	Objection	Date Identified	Date Admitted
72.	January 23, 2019 Community Living Well Referral Form regarding Plaintiff. [DOE000326-DOE000328]	Defendant	Evid. Code §§ 350, 352, 917(a)		
73.	April 28, 2016 Take Time to Talk – Primary Care Mental Health Service regarding Plaintiff. [DOE000329-DOE000331]	Defendant	Evid. Code §§ 350, 352, 917(a)		
74.	October 28, 2017 NHS Standard Referral Form regarding Plaintiff. [DOE000332-DOE000333]	Defendant	Evid. Code §§ 350, 352, 917(a)		
75.	January 1, 2008 to August 28, 2023 Declaration of Custodian of Records, Krystle Paul, for medical records regarding Plaintiff. [DOE_000695]	Defendant	Evid. Code §§ 350, 352, 917(a)		
76.	January 1, 2008 to August 28, 2023 Plaintiff’s medical file with chart and summary of “Encounters” for individual counseling. [DOE_000696-739]	Defendant	Evid. Code §§ 350, 352, 917(a)		
77.	August 6, 2021 response by Wendy Blanco providing psychosocial assessment regarding Plaintiff. [DOE_000740-748]	Defendant	Evid. Code §§ 350, 352, 917(a)		
78.	October 9, 2021 to August 15, 2022 Printable Notes for Counseling Contacts/Sessions with Plaintiff. [DOE_000749-790]	Defendant	Evid. Code §§ 350, 352, 917(a)		
79.	September 5, 2023 deposition transcript of Ruth Bracegirdle. [126pp.]	Defendant	Evid. Code § 1400		

Ex.	Description	Offered By	Objection	Date Identified	Date Admitted
80.	September 7, 2023 deposition transcript of Plaintiff.	Defendant			
81.	Artistic renderings of Plaintiff and Brian Warner. [BW000155]	Defendant	Evid. Code §§ 350, 352, 403, 1400		
82.	Pictures of Brian Warner. [BW000156-175]	Defendant			
83.	Demonstrative and Illustrative Exhibits [To Be Provided]	Defendant			

PLAINTIFF'S EXHIBITS

Ex.	Description	Offered By	Objection	Date Identified	Date Admitted
100.	Photograph (undated) [DOE_000591]	Plaintiff	E.C. § 350		
101.	3/1/2011 Email from Defendant to Plaintiff with photograph; subject line "my fave" [DOE_000592]	Plaintiff			
102.	Photograph of Plaintiff and unknown woman (undated) [DOE_000593]	Plaintiff			
103.	Photograph of Plaintiff and Defendant with tattoo pen (undated) [DOE_000594]	Plaintiff			
104.	Photograph of Plaintiff (undated) [DOE_000595]	Plaintiff			
105.	8/10/2011 Email/Message from 3238393328@pixmbl.com with 2 photographs [DOE_000596]	Plaintiff			
106.	Photograph of Plaintiff and Defendant (undated) [DOE_000597]	Plaintiff			
107.	Photograph of Plaintiff and Defendant (undated) [DOE_000598]	Plaintiff			

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Ex.	Description	Offered By	Objection	Date Identified	Date Admitted
108.	Photograph of Plaintiff and Defendant (undated) [DOE_000599]	Plaintiff			
109.	Photograph of Plaintiff and Defendant (undated) [DOE_000600]	Plaintiff			
110.	Photograph of Plaintiff and Defendant (undated) [DOE_000601]	Plaintiff			
111.	Photograph of Plaintiff with tattoo pen and unknown male (undated) [DOE_000602]	Plaintiff			
112.	Photograph of cat toy (undated) [DOE_000618]	Plaintiff			
113.	Photograph of key chains (undated) [DOE_000619]	Plaintiff			
114.	Photograph of Plaintiff (undated) [DOE_000626]	Plaintiff			
115.	Photograph of Plaintiff (undated) [DOE_000627]	Plaintiff			
116.	5/25/2011 Email/Message from 3238393328@pixmbl.com with 1 painting [DOE_000635]	Plaintiff			
117.	Instagram Post by "chloeblackmusic" [DOE_000480-483]	Plaintiff	E.C. §§ 350, 352, 1200		
118.	Demonstrative and Illustrative Exhibits [To Be Provided]				

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DATED: September 18, 2023 PEIFFER WOLF CARR KANE CONWAY & WISE, LLP

By: /s/ Adam B. Wolf
ADAM B. WOLF
Attorneys for Plaintiff JANE DOE

DATED: September 18, 2023 KING, HOLMES, PATERNO & SORIANO, LLP

By: /s/ Howard E. King
HOWARD E. KING
Attorneys for Defendant, BRIAN WARNER

JUSTICEFORMARILYNMANSON.COM

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PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES
Doe v. Warner
Case No. 21STCV20202


I am over the age of 18 and not a party to the within action; my business address is: 3435 Wilshire Boulevard, Suite 1400, Los Angeles, CA 90010.
On the date mentioned below, I served the foregoing document(s) described as:

JOINT TRIAL EXHIBIT LIST

on the interested parties in this action by electronically transmitting the foregoing document to persons as stated on the attached service list:

- VIA U.S. MAIL:** I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
- BY OVERNIGHT COURIER:** By depositing copies of the above document(s) in a box or other facility regularly maintained by FEDERAL EXPRESS, in an envelope or package designed by FEDERAL EXPRESS with delivery fees paid or provided for and sent to the person(s) named on the attached service list [C.C.P. §1013, 2015.5].
- VIA FACSIMILE TRANSMISSION:** The facsimile machine I used complied with Rule 2.306, and no error was reported by the machine. Pursuant to Rule 2.306, I caused the machine to print a record of the transmission, a copy of which is attached to this declaration.
- VIA PERSONAL SERVICE:** I caused such envelope to be delivered by hand to the offices of the addressee(s).
- VIA E-MAIL:** My electronic service address is mrosadini@peifferwolf.com. I caused said document to be sent via email, per agreement amongst counsel, to the office(s) of the addressee(s) so designated.
- STATE:** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on September 18, 2023 at Los Angeles, California.



Melisa Rosadini-Knott

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SERVICE LIST
Doe v. Warner
Case No. 21STCV20202

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