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

RONEE SUE BLAKLEY, an individual,  
  
Plaintiff,  
  
v.  
  
CARROLL CARTWRIGHT, an individual,  
and DOES 1-100, inclusive,  
  
Defendants.

CASE No. **BC 543217**  
**COMPLAINT FOR DAMAGES FOR (1)  
LIBEL AND (2) INTENTIONAL  
INFLECTION OF EMOTIONAL  
DISTRESS; REQUEST FOR JURY TRIAL**

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ORIGINAL FILED  
Superior Court Of California  
County Of Los Angeles

APR 18 2014

Sherri R. Carter, Executive Officer/Clerk  
By: Judi Lara, Deputy



Plaintiff Ronee Sue Blakley complains of defendant Carroll Cartwright, and DOES 1-100,  
and alleges as follows:

## INTRODUCTION

1  
2 1. This is a classic “libel in fiction” lawsuit arising out of the film, *What Maisie Knew*,  
3 (“Film”) which is about a young girl whose unmarried parents are engaged in a bitter custody  
4 battle for her. The mother character, Susanna, is a musician and singer who is a monstrously bad  
5 mother. Indeed, in press interviews, Julianne Moore, who plays Susanna, has described her  
6 character as an abusive mother who neglects her child. And on the Directors’ Commentary which  
7 is a special feature on the DVD of the Film, one of the directors of the Film states, “Susanna was  
8 such a bad mother” – at which point, he and his co-director start laughing.

9 2. If Susanna had been an entirely fictional character, this lawsuit would never have  
10 been filed. But that is not the case. Cartwright, who co-wrote the screenplay of the Film, has  
11 admitted that it is closely based on his own first hand personal experience of a lengthy and  
12 acrimonious battle for the custody of his daughter, Sarah. Susanna is a thinly disguised portrait of  
13 his antagonist in that battle: Sarah’s mother – the musician and singer, Ronee Sue Blakley. The  
14 primary thrust of this lawsuit is therefore very simple: Cartwright wrote the screenplay to further  
15 his own feelings of hatred for Blakley by maliciously and falsely portraying her as a selfish and  
16 uncaring mother, when in fact she was a devoted and loving parent. This false depiction of Blakley  
17 has damaged her reputation and caused her to suffer severe emotional distress.

## SUMMARY OF THE RELEVANT FACTS

18  
19 3. Blakley is primarily a musician, singer, songwriter and record producer, whose first  
20 album was released in 1972. She has also acted, and was nominated for an Academy Award for  
21 her role in Robert Altman’s 1975 classic film, *Nashville*. She and Cartwright, an aspiring  
22 screenwriter, had a romantic relationship between 1982 and 1987, but never married. The  
23 relationship ended shortly before Blakley gave birth to Sarah in 1988.

24 4. Cartwright initially wanted nothing to do with Sarah, who was being raised by  
25 Blakley on her own, and even denied initially that he was her father. However, in 1991, this court  
26 entered a stipulated judgment declaring that Cartwright was Sarah’s father, and ordering that  
27 Blakley and Cartwright would have joint legal and physical custody of her. What should have  
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1 been the end of the legal proceedings turned out to be only the first chapter. Over the next 10-12  
2 years, Cartwright, using funds provided by his wealthy parents, made application after application  
3 to the court for primary physical custody and other relief. One effect of this conflict was that  
4 Cartwright, as one court-appointed psychiatrist opined, formed a deep hatred for Blakley.

5           5.       Cartwright makes no secret of the autobiographical nature of the screenplay. He  
6 kept notes during the custody battle which he used to write a screenplay, and has freely admitted  
7 in media interviews about the Film that he injected his personal experiences into the screenplay.  
8 For example, in an interview for the Writers Guild of America (“WGA Interview”), he said,  
9 “When I got myself into a custody battle, years after having read What Maisie Knew (a novel by  
10 Henry James), it came to mind as something I could relate to and bring up-to-date without much  
11 trouble. It definitely resonated with what I was dealing with in my life.... I was reacting to certain  
12 situations in my own life and didn’t have much perspective on them. [The screenplay] is a piece of  
13 work that represents a unique moment in my life.” He and his co-writer finished the first version  
14 of the script in 1995. Blakley alleges upon information and belief that he revised it several times,  
15 and that he participated in other aspects of the making of the Film, such as casting.

16           6.       The focal character of the screenplay and the Film is a 6 year old girl called Maisie,  
17 whose parents are Beale (his last name), an art dealer, and Susanna, a musician. As a review of the  
18 Film in the New York Times states, “[t]heir fights quickly and inevitably lead to a breakup, after  
19 which Maisie becomes a pawn in a bitter game. .... After the split with Susanna, Beale takes up  
20 with Margo, who had been Maisie’s live-in nanny and who remains the only trustworthy adult in  
21 her life. Susanna, more out of calculation than affection, takes up with Lincoln, a studly young  
22 fellow without much ambition. These stepparents in effect share custody of the girl, and they  
23 begin to look like an impromptu, unofficial family.”

24           7.       The Film has been marketed as an adaption of the Henry James’ novel, “What  
25 Maisie Knew,” which was first published in 1897 (“Novel”). In the Novel, a married couple, Beale  
26 and Ida Farange, divorce and engage in a custody battle for their daughter, Maisie. They each  
27 remarry, Beale to Maisie’s governess (Miss Overmore), and Ida to Sir Claude. But Beale and Ida  
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1 both cheat on their new spouses, who end up having an affair. Maisie's biological parents abandon  
2 her and she becomes the responsibility of Sir Claude and the former Miss Overmore. Eventually,  
3 Maisie must decide if she wants to remain with them, or to live with her new governess, Mrs. Wix.  
4 She concludes that her new parents' relationship will likely end as her biological parents' did. She  
5 leaves them and goes to stay with Mrs. Wix.

6 9. There are many differences between the Novel and the screenplay. Indeed, there  
7 appears to be no requirement that the screenplay, and consequently the Film, be presented as an  
8 adaption of the Novel – this was entirely Cartwright’s choice. In fact, Cartwright has stated that  
9 the screenplay was not an adaption of the Novel, but is rather a “spiritual guide.” In the WGA  
10 Interview, he states that “[w]e definitely took in the book and the plot and did not try to redeliver  
11 it to fans of the book as something recognizable. Though there were elements – a lot of elements –  
12 of the plot reproduced in the script, at a certain point, we leave that behind, and it is more a sort of  
13 spiritual guide. An adaptation would be plot points delivered more faithfully.” However the  
14 description of the Film as being an adaption of the Novel is very useful for Cartwright because it  
15 allows him to claim, on the one hand, that the devastatingly unpleasant mother character in the  
16 screenplay is based on the mother character in the Novel, while on the other hand, the fact that the  
17 screenplay is only loosely based on the Novel allows him to include details about Susanna which  
18 do not appear in the Novel, but which will cause anyone who knows Blakley and sees the Film to  
19 easily recognize Susanna as her. It is therefore a literary devise for disguising his ulterior purpose  
20 of defaming Blakley while attempting to shield himself from liability.

21 8. In writing a screenplay which includes a thinly disguised portrait of Blakley as an  
22 odious parent, Cartwright has ignored the excellent advice given by Professor Rodney Smolla (one  
23 of Blakley’s counsel in this case, and the author of the treatise entitled “Law of Defamation”) to  
24 any writer who wishes to draw from a real person as the basis for a fictional character: “there are  
25 two relatively ‘safe’ courses of action from a legal perspective: First, the author may make little or  
26 no attempt to disguise the character, but refrain from any defamatory and false embellishments on  
27 the character's conduct or personality; second, the author may engage in creative embellishments  
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1 that reflect negatively on the character's reputation, but make substantial efforts to disguise the  
2 character, by changing name, age, geographic setting, personality, occupation, or other factors  
3 sufficiently to avoid identification. When an author takes a middle ground, however, neither  
4 adhering perfectly to the real person's attributes and behavior nor engaging in elaborate disguise,  
5 there is a threat of defamation liability.” [Smolla, Law of Defamation, (2<sup>nd</sup> Ed., 2013) §4:48 at p.  
6 4-73). Cartwright has chosen to occupy that middle ground.

7 9. The most recent version of the screenplay appears verbatim, or almost verbatim, in  
8 the Film, which was first released in theatres in May 2013. The Film was also separately released  
9 in August 2013, in a DVD that included additional elements of the Film that were not included in  
10 the theatrical release, including, without limitation, deleted scenes and a director’s commentary.

11 10. An examination of the following “Of and Concerning” factors, which are cited in  
12 Smolla’s Law of Defamation at ¶4:47, demonstrates that any reasonable person who knew Blakley  
13 and saw the Film would clearly recognize Susanna as her:

14 A. Whether the plaintiff's name, or a very similar name, is used

15 Blakley is known to many of her friends and family as “Ronee Sue.” Cartwright kept the  
16 father’s unusual name in the Novel (Beale) when he wrote the screenplay. If he had not wanted to  
17 keep the mother’s name in the Novel (Ida), he could have chosen any name. “Ronee” would have  
18 been too obvious, so he chose “Susanna,” which is, of course, very similar to Sue.

19 B. Whether there are physical appearance similarities between the plaintiff and the  
20 character

21 Blakley is 5’4”-5’5” and Susanna (i.e., Julianne Moore) is 5’4”. Both have long straight  
22 reddish/brown hair, parted on the side. And both wore red plaid flannel shirts, e.g., Blakley is  
23 wearing such a shirt in an iconic photo of her that appeared on the cover of Interview magazine.

24 C. Whether the ages of the plaintiff and the character are close

25 In 1994, when Sarah was the same age as Maisie in the Film, Blakley was aged 48-49. And  
26 in 2011 when the Film was shot, the actress playing Susanna was aged 50. Thus Blakley and  
27 Susanna both had their only child, a daughter, very late in life, aged 42-44.

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1 D. Whether there are similarities in occupation or career progress

2 Blakley is a musician, singer, songwriter and producer whose career was on the wane -  
3 Susanna is also depicted in the Film as a musician, singer, songwriter and producer whose career  
4 is on the wane;

5 They even play the same instruments: Blakley played an acoustic Martin guitar, and an  
6 electric guitar and the piano – in the Film, Susanna plays a Martin in the opening scene, and is also  
7 shown playing an electric guitar and the piano during the Film.

8 In the Film, Susanna produces a video in which she stars. Blakley has done the same.

9 E. Whether there are similarities in relationships and personality characteristics

10 The similarities in relationships are striking. In real life, Blakley and Cartwright were  
11 unmarried parents engaged in an acrimonious custody battle over their young daughter – in the  
12 Film, Beale and Susanna are unmarried parents engaged in an acrimonious custody battle over  
13 their young daughter.

14 F. Whether the work as a whole is clearly presented as fiction

15 The Film is presented as an adaption of the Novel, but as has been pointed out above, it is  
16 not an adaption in the usual sense, and Cartwright gave numerous interviews in which he spoke  
17 about the autobiographical nature of the screenplay.

18 G. Whether a disclaimer labeling the work as fiction and similarities as "coincidental"  
19 is employed

20 At the very end of the Film, after the credits, and even after the copyright notice, there is a  
21 standard disclaimer: “The persons and events in this motion picture are fictitious. Any similarity to  
22 actual people or events is unintentional.” However Cartwright has publicly acknowledged that the  
23 screenplay is autobiographical and that he closely based Maisie on Sarah, so the disclaimer is  
24 clearly untrue.

25 H. Whether there are similarities between the plot of the fictional work and the real  
26 events in the plaintiff’s life

27 There are many such similarities. Blakley and Cartwright had an acrimonious custody  
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1 battle over Sarah and were not married - the Film is also about an acrimonious custody battle  
2 between the parents of a little girl who are not married;

3 (i) Maisie and Sarah both had attractive young foreign nannies – Maisie’s is called  
4 Margo, and Sarah’s was called Marisela.

5 (ii) In the sleep-over scene, Maisie’s friend starts crying and has to be picked up by her  
6 parents. On one occasion when Blakley gave a party for Sarah, one of Sarah’s friends started  
7 crying and had to be picked up by her parents.

8 (iii) In the Film, Maisie burned herself while staying with Beale. In real life, Sarah  
9 suffered a burn while she was staying with her father.

10 (iv) Sarah had a canopy bed at Cartwright’s residence that is similar to Maisie’s  
11 bedroom in Beale’s apartment.

12 (v) In Susanna’s apartment, there is a distinctive statue of a South East Asian goddess,  
13 Kwan Minh; Blakley owns a very similar statue; also they both had leather furniture.

14 (vi) Susanna sent Maisie flowers while she was staying with Beale. Blakley sent Sarah  
15 flowers while she was staying with Cartwright.

16 I. Whether the use of the plaintiff’s name or the fictional character allegedly  
17 representing the plaintiff play prominent roles in the fictional work or have only  
18 "fleeting and incidental" significance;

19 Susanna is the main character in the Film after Maisie.

20 J. Whether the events that take place in the fictional work are so fantastical or bizarre  
21 that no reasonable reader would treat them as realistic depictions.

22 The events in the Film could easily be believed to be portraying real events, especially  
23 since Cartwright has stated publicly that the screenplay was based on his personal experiences.

24 The false portrayal of Blakley is as the parent of a young girl whom she had when aged 43/44, in  
25 the context of an acrimonious custody battle. In real life, Blakley was the mother of a young girl  
26 whom she had when aged 42, and who was the subject of an acrimonious custody battle.

27 11. Blakley and Cartwright are both members in an artistic community of actors,  
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1 actresses, directors, producers, screen writers, playwrights, songwriters, musicians, and the many  
2 other artistic, technical, and business talents who collectively comprise the film and music  
3 industries that both Blakely and Cartwright have been part of decades. That community is of  
4 special importance in this lawsuit, for two reasons. First, that community includes the principal  
5 individuals who knew both Blakley and Cartwright at the time giving rise to the events upon  
6 which this lawsuit is predicated. Many members of that group, who knew both Blakley and  
7 Cartwright in “real life,” have identified the character Susanna in the Film as intended to depict,  
8 and as actually depicting, Blakley. Second, that is the group that most matters to Blakely in the  
9 preservation of her good name. Blakley’s claim to severe reputational damage, which rests at the  
10 core of this lawsuit, is grounded in the assertion that within this highly influential community—the  
11 community on which Blakely’s entire emotional, social, and professional reputational stock and  
12 self-esteem is invested—the Film is all about Blakley being a bad mother. Members of this group  
13 know enough to know that the Film is about Blakley. Members of this group do not know enough  
14 to know that the horrible things stated about Blakely (through the character Susanna) in the Film  
15 are actually falsehoods. Members of this group, critical to the reputation of Blakley, in short,  
16 “make the connection” between the character Susanna and the real person Blakley. In turn,  
17 members of this group, who did not know the actual truth regarding Blakley, Cartwright, and their  
18 daughter Sarah, will assume, to the great reputational injury of Blakley, that the terribly damning  
19 portrayal of Blakley in the Film is an accurate depiction of how Blakley actually behaved as a  
20 mother.

21 **PARTIES AND JURISDICTION**

22 12. Blakley is, and at all relevant times herein mentioned was, an individual residing in  
23 the county of Los Angeles, state of California.

24 13. Blakley is informed and believes, and on that basis alleges, that Cartwright is an  
25 individual residing in the county of Los Angeles, state of California.

26 14. The true names and capacities, whether individual, corporate, or otherwise, of those  
27 defendants sued herein as DOES 1 through 100, inclusive are presently unknown to Plaintiff, who  
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1 therefore sue said defendants by fictitious names. Whenever in this Complaint reference is made  
2 to “Defendant(s),” such allegation shall be deemed to mean the acts of all of the defendants  
3 mentioned in this paragraph and those above, acting individually, jointly and/or severally.

4 15. Blakley is informed and believes, and on that basis alleges, that at all relevant  
5 times, each Defendant was an agent and/or employee of every other Defendant. In doing the  
6 things alleged in the causes of action stated herein, every Defendant was acting within the course  
7 and scope of this agency or employment, and was acting with the consent, permission and  
8 authorization of each of the remaining Defendants. All actions of each Defendant as alleged  
9 herein were ratified and approved by every other Defendant or its officers or managing agents.

10 **FIRST CAUSE OF ACTION**

11 **LIBEL AND LIBEL PER SE**

12 16. Blakley incorporates in this cause of action all allegations contained in paragraph 1  
13 through 15 of this Complaint as though set forth fully herein.

14 17. The screenplay and the Film contain depictions and descriptions of Blakley which  
15 constitute false, defamatory and unprivileged statements of and concerning Blakley. The following  
16 defamatory statements (the "Defamatory Statements") in the screenplay and the Film are libelous  
17 on their face and constitute defamation per se.

18 **First Defamatory Statement**

19 Blakley is a selfish and uncaring mother who frequently smokes in their apartment and  
20 drinks heavily while being around her six year old daughter. This statement is false. Blakley quit  
21 smoking before Sarah was born and never started again. She stopped drinking when she became  
22 pregnant. Since Sarah was aged around 3, she has been a light social drinker.

23 **Second Defamatory Statement**

24 Blakley is a foul-mouthed mother who screams obscenities and swears in front of her six  
25 year old daughter (e.g., screaming at the father of her daughter who is banging on the door after  
26 she locked him out of their apartment: “Stop making that fucking noise;” screaming at the father:  
27 “Fuck you;” screaming at the father “asshole;” raising her middle finger at the father; calling the  
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1 father’s girlfriend “a tramp with a daddy fixation.”) This statement is false. Blakley almost never  
2 used foul language and gestures like this in front of Sarah.

3 Third Defamatory Statement

4 Blakley is a selfish and uncaring mother who sits at the piano at night, smoking and  
5 drinking, while neglecting to care for her six year old daughter who is left to make herself a  
6 sandwich for dinner, and who goes to sleep fully dressed in her day clothes surrounded by leftover  
7 food and an empty Coke bottle. This statement is false. Blakley never did this.

8 Fourth Defamatory Statement

9 Blakley is a selfish and uncaring mother who allows her six year old daughter and her  
10 equally young sleepover friend to run wild while she and her friends are partying, drinking,  
11 smoking, and possibly taking drugs, and playing music so loud late at night that it stops the friend  
12 from sleeping and she consequently starts crying. This statement is false. Blakley never did this.

13 Fifth Defamatory Statement

14 Blakley is a cynical and devious mother who declares, in a tipsy voice, in the direction of  
15 the departing parents of her six year old daughter’s friend during an aborted sleep-away: “So much  
16 for them testifying for me.” This statement is false. One of Sarah’s friends did start crying at a  
17 party at Blakley's house and had to be picked up by her parents, but Blakley never made the  
18 statement in question.

19 Sixth Defamatory Statement

20 Blakley is a dishonest and manipulative mother who tries to influence her six year old  
21 daughter’s testimony to the court by suggesting that she tells a psychiatrist that her father had  
22 thrown her across the room and that this had been an “earth-shattering moment” for her. This  
23 statement is false. Blakley never acted in this manner.

24 Seventh Defamatory Statement

25 Blakley is a dishonest and manipulative mother who intentionally violates a court order by  
26 trying to influence her young daughter against her father. This statement is false. Blakley never  
27 acted in this manner.

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Eighth Defamatory Statement

Blakley is a selfish and unreasonable mother who interrogates her six year old daughter about her father’s relationship with another woman (after she and the father have separated), and then uses that information to try to get sole custody of her daughter. This statement is false. Blakley never acted in this manner – she was always willing to share custody of Sarah with Cartwright.

Ninth Defamatory Statement

Blakley is a thoughtless and unreliable mother who drops off her six year old daughter at school before it opens, and who fails to collect her from school on time, causing the daughter to wait around for a long time, and then sends a man to collect her whom the daughter does not know. This statement is false. Blakley never acted in this manner.

Tenth Defamatory Statement

Blakley is a thoughtless mother who allows her six year old daughter to see her boyfriend walking around their apartment in his underwear. This statement is false. Blakley never acted in this manner.

Eleventh Defamatory Statement

Blakley is a jealous and selfish mother who becomes visibly upset when she sees her six year old daughter bonding with her boyfriend. This statement is false. Blakley never acted in this manner.

Twelfth Defamatory Statement

Blakley is a thoughtless mother who allows her six year old daughter to wait in the lobby of their apartment building on her own, to be picked up by her father. This statement is false. Blakley never acted in this manner.

Thirteenth Defamatory Statement

Blakley is a jealous and selfish mother who tells her boyfriend (with respect to her six year old daughter has just read out something she wrote to her mother and her boyfriend): “What am I, invisible? You don’t get a bonus for making her fall in love with you.” This statement is false.

1 Blakley never acted in this manner.

2 Fourteenth Defamatory Statement

3 Blakley is a thoughtless, unreliable and selfish mother who fails to collect her six year old  
4 daughter from the father's house until 3 days after the arranged pick-up day, and who fails to  
5 contact the father or her daughter during this period, despite the fact that her daughter is sick with  
6 a high fever. This statement is false. Blakley never acted in this manner, and always exercised her  
7 custody rights in full. For example, she once drove from Mexico to Los Angeles and back again,  
8 just to have dinner with Sarah, to go to a movie and get their nails done.

9 Fifteenth Defamatory Statement

10 Blakley is a selfish and uncaring mother who places her career above looking after her six  
11 year old daughter, who neglects her daughter and who spends little time with her. This statement  
12 is false. Blakley never acted in this manner.

13 Sixteenth Defamatory Statement

14 Blakley is a selfish and uncaring mother who does not tell her six year old daughter when  
15 she has arrived back after a trip. This statement is false. Blakley never acted in this manner, and  
16 has always exercised her custody rights in full under any and all circumstances.

17 Seventeenth Defamatory Statement

18 Blakley is a dishonest person who cheats on her husband. This statement is false. Blakley  
19 never acted in this manner.

20 Eighteenth Defamatory Statement

21 Blakley is a selfish and uncaring mother who drops her young daughter off at night in front  
22 of the restaurant where her boyfriend works, without making sure that her boyfriend is there (and  
23 he isn't), and without leaving contact information, so that a waitress (who is kind but a stranger)  
24 takes the daughter back to her apartment, and the daughter wakes up in the middle of the night in a  
25 strange place with people she doesn't know, gets scared and cries and begs them take her home.  
26 This statement is false. Blakley never acted in this manner.

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28

1 Nineteenth Defamatory Statement

2 Blakley is a selfish and uncaring mother who abandons her young daughter by leaving her  
3 to live with another couple. This statement is false. Blakley never acted in this manner.

4 18. At no time did Blakley provide consent or authorization to any of the Defendants to  
5 write about, describe, or depict her in any way, nor did she have knowledge, prior to May 2013,  
6 that Cartwright had written the screenplay about her or that Defendants would describe and depict  
7 her in the Film.

8 19. The Defamatory Statements expose Blakley to injury to her reputation by  
9 attributing to her the appearance of negative personal traits or attitudes that she does not possess,  
10 including, but not limited to, being a thoughtless, dishonest, unreliable, selfish, jealous, uncaring,  
11 foul-mouthed and manipulative mother who acted in the various ways alleged in Paragraph 17  
12 above. The Defamatory Statements subject Blakley to contempt and ridicule, injure her in her  
13 profession, and cause others to shun and avoid her.

14 20. The Defamatory Statements were published by Defendants as alleged above  
15 negligently and/or with Constitutional actual malice, knowing that they were false or were made  
16 with a reckless disregard for the truth or falsity of what was stated.

17 21. As a proximate result of the foregoing, Blakley has suffered damages, including  
18 emotional distress damages, in an amount in excess of Three Million Dollars (\$3,000,000),  
19 according to proof at trial.

20 22. The conduct of Defendants as described herein was done with a conscious  
21 disregard of the rights of Blakley, with the intent to vex, annoy, and/or harass her. Such conduct  
22 was unauthorized and constitutes oppression, fraud, and/or malice under California Civil Code  
23 §3294, entitling Blakley to an award of punitive damages in an amount appropriate to punish or  
24 set an example of Defendants in an amount to be determined at trial.

25 SECOND CAUSE OF ACTION

26 INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

27 23. Blakley incorporates in this cause of action all allegations contained in paragraphs  
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1 1 through 22 of this Complaint as though set forth fully herein.

2 24. Defendants engaged in extreme and outrageous conduct with the intention of  
3 causing, or reckless disregard of the probability of causing, severe emotional distress to Blakley.  
4 Defendants' conduct was so extreme and outrageous as to go beyond all possible bonds of  
5 decency, and is regarded as atrocious, and utterly intolerable in a civilized community.

6 25. Blakley suffered severe emotional distress as a result of the Defamatory Statements  
7 and Defendants' conduct, including, but not limited to, anger, frustration, humiliation, chagrin, fear  
8 and uncertainty, and a feeling of helplessness.

9 26. As a proximate result of the foregoing, Blakley has suffered damages, including  
10 emotional distress damages, in an amount in excess of Three Million Dollars (\$3,000,000),  
11 according to proof at trial.

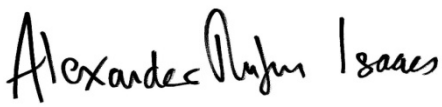
12 27. Defendants' conduct as described herein was done with a conscious disregard of the  
13 rights of Blakley, with the intent to vex, annoy, and/or harass Blakley. Such conduct was  
14 unauthorized and constitutes oppression, fraud, and/or malice under California Civil Code §3294,  
15 entitling Blakley to an award of punitive damages in an amount appropriate to punish or set an  
16 example of Defendants in an amount to be determined at trial.

17 WHEREFORE, Blakley prays for judgment against Defendants as follows:

- 18 1. For general damages according to proof at trial, but not less than three million  
19 dollars (\$3,000,000);
- 20 2. For punitive damages;
- 21 3. For costs of suit; and
- 22 4. For such other, further relief as the Court deems proper under the circumstances.

23  
24 DATED: April 18, 2014

RUFUS-ISAACS ACLAND & GRANTHAM LLP

25  
26 By:   
27 Alexander Rufus-Isaacs  
28 Attorneys for plaintiff RONEE SUE BLAKLEY

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**REQUEST FOR JURY TRIAL**

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Plaintiff Ronee Sue Blakley requests trial by jury.

DATED: April 18, 2014

RUFUS-ISAACS ACLAND & GRANTHAM LLP

By: Alexander Rufus Isaacs  
Alexander Rufus-Isaacs  
Attorneys for plaintiff RONEE SUE BLAKLEY