

PLAINTIFF/PETITIONER: Janice Dickinson	CASE NUMBER: BC580909
DEFENDANT/RESPONDENT: William H. Cosby, Jr.	

4. b. Provide a brief statement of the case, including any damages. *(If personal injury damages are sought, specify the injury and damages claimed, including medical expenses to date [indicate source and amount], estimated future medical expenses, lost earnings to date, and estimated future lost earnings. If equitable relief is sought, describe the nature of the relief.)*
 In 1982, Defendant raped Plaintiff. Plaintiff recounted this incident in a TV interview on November 18, 2014. Defendant maliciously sent a letter that day to several media outlets declaring Plaintiff a liar. The next day, Defendant maliciously issued a mirroring statement to the media. These statements were false. Plaintiff has suffered reputation-based, emotional and economic damages.
- (If more space is needed, check this box and attach a page designated as Attachment 4b.)*
5. **Jury or nonjury trial**
 The party or parties request a jury trial a nonjury trial. *(If more than one party, provide the name of each party requesting a jury trial):*
6. **Trial date**
- a. The trial has been set for *(date)*:
- b. No trial date has been set. This case will be ready for trial within 12 months of the date of the filing of the complaint *(if not, explain)*:
 This case will be ready for trial no sooner than one year following the lift of the discovery stay.
- c. Dates on which parties or attorneys will not be available for trial *(specify dates and explain reasons for unavailability)*:
7. **Estimated length of trial**
 The party or parties estimate that the trial will take *(check one)*:
- a. days *(specify number)*: 6-8
- b. hours (short causes) *(specify)*:
8. **Trial representation** *(to be answered for each party)*
 The party or parties will be represented at trial by the attorney or party listed in the caption by the following:
- a. Attorney:
- b. Firm:
- c. Address:
- d. Telephone number:
- e. E-mail address:
- f. Fax number:
- g. Party represented:
- Additional representation is described in Attachment 8.
9. **Preference**
 This case is entitled to preference *(specify code section)*:
10. **Alternative dispute resolution (ADR)**
- a. **ADR information package.** Please note that different ADR processes are available in different courts and communities; read the ADR information package provided by the court under rule 3.221 for information about the processes available through the court and community programs in this case.
- (1) For parties represented by counsel: Counsel has has not provided the ADR information package identified in rule 3.221 to the client and reviewed ADR options with the client.
- (2) For self-represented parties: Party has has not reviewed the ADR information package identified in rule 3.221.
- b. **Referral to judicial arbitration or civil action mediation** (if available).
- (1) This matter is subject to mandatory judicial arbitration under Code of Civil Procedure section 1141.11 or to civil action mediation under Code of Civil Procedure section 1775.3 because the amount in controversy does not exceed the statutory limit.
- (2) Plaintiff elects to refer this case to judicial arbitration and agrees to limit recovery to the amount specified in Code of Civil Procedure section 1141.11.
- (3) This case is exempt from judicial arbitration under rule 3.811 of the California Rules of Court or from civil action mediation under Code of Civil Procedure section 1775 et seq. *(specify exemption)*:

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10. c. Indicate the ADR process or processes that the party or parties are willing to participate in, have agreed to participate in, or have already participated in (*check all that apply and provide the specified information*):

	The party or parties completing this form are willing to participate in the following ADR processes (<i>check all that apply</i>):	If the party or parties completing this form in the case have agreed to participate in or have already completed an ADR process or processes, indicate the status of the processes (<i>attach a copy of the parties' ADR stipulation</i>):
(1) Mediation	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Mediation session not yet scheduled <input type="checkbox"/> Mediation session scheduled for (<i>date</i>): <input type="checkbox"/> Agreed to complete mediation by (<i>date</i>): <input type="checkbox"/> Mediation completed on (<i>date</i>):
(2) Settlement conference	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Settlement conference not yet scheduled <input type="checkbox"/> Settlement conference scheduled for (<i>date</i>): <input type="checkbox"/> Agreed to complete settlement conference by (<i>date</i>): <input type="checkbox"/> Settlement conference completed on (<i>date</i>):
(3) Neutral evaluation	<input type="checkbox"/>	<input type="checkbox"/> Neutral evaluation not yet scheduled <input type="checkbox"/> Neutral evaluation scheduled for (<i>date</i>): <input type="checkbox"/> Agreed to complete neutral evaluation by (<i>date</i>): <input type="checkbox"/> Neutral evaluation completed on (<i>date</i>):
(4) Nonbinding judicial arbitration	<input type="checkbox"/>	<input type="checkbox"/> Judicial arbitration not yet scheduled <input type="checkbox"/> Judicial arbitration scheduled for (<i>date</i>): <input type="checkbox"/> Agreed to complete judicial arbitration by (<i>date</i>): <input type="checkbox"/> Judicial arbitration completed on (<i>date</i>):
(5) Binding private arbitration	<input type="checkbox"/>	<input type="checkbox"/> Private arbitration not yet scheduled <input type="checkbox"/> Private arbitration scheduled for (<i>date</i>): <input type="checkbox"/> Agreed to complete private arbitration by (<i>date</i>): <input type="checkbox"/> Private arbitration completed on (<i>date</i>):
(6) Other (<i>specify</i>):	<input type="checkbox"/>	<input type="checkbox"/> ADR session not yet scheduled <input type="checkbox"/> ADR session scheduled for (<i>date</i>): <input type="checkbox"/> Agreed to complete ADR session by (<i>date</i>): <input type="checkbox"/> ADR completed on (<i>date</i>):

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11. Insurance

- a. Insurance carrier, if any, for party filing this statement (*name*):
- b. Reservation of rights: Yes No
- c. Coverage issues will significantly affect resolution of this case (*explain*):

12. Jurisdiction

Indicate any matters that may affect the court's jurisdiction or processing of this case and describe the status.

- Bankruptcy Other (*specify*):

Status:

13. Related cases, consolidation, and coordination

- a. There are companion, underlying, or related cases.
 - (1) Name of case: AIG Property Casualty Company v. William H. Cosby and Janice Dickinson
 - (2) Name of court: United States District Court, Central District of California, Western Division
 - (3) Case number: 2:15-cv-04842
 - (4) Status: Complaint Filed
- Additional cases are described in Attachment 13a.
- b. A motion to consolidate coordinate will be filed by (*name party*):

14. Bifurcation

- The party or parties intend to file a motion for an order bifurcating, severing, or coordinating the following issues or causes of action (*specify moving party, type of motion, and reasons*):

15. Other motions

- The party or parties expect to file the following motions before trial (*specify moving party, type of motion, and issues*):
Plaintiff's Motion to Lift Stay of Discovery - the Defendant's Anti-SLAPP motion has stayed discovery until at least October 15. Thereafter, other discovery issues are anticipated due to the sensitive nature of this case.

16. Discovery

- a. The party or parties have completed all discovery.
 - b. The following discovery will be completed by the date specified (*describe all anticipated discovery*):
- | <u>Party</u> | <u>Description</u> | <u>Date</u> |
|--------------|--------------------|-------------|
|--------------|--------------------|-------------|

- c. The following discovery issues, including issues regarding the discovery of electronically stored information, are anticipated (*specify*):
On account of Defendant's pending Anti-SLAPP motion, discovery has been stayed. Plaintiff anticipates several discovery issues due to the sensitive nature of the facts and underlying claims. The anticipated discovery issues have yet to materialize due to the discovery stay.

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17. **Economic litigation**

- a. This is a limited civil case (i.e., the amount demanded is \$25,000 or less) and the economic litigation procedures in Code of Civil Procedure sections 90-98 will apply to this case.
- b. This is a limited civil case and a motion to withdraw the case from the economic litigation procedures or for additional discovery will be filed (*if checked, explain specifically why economic litigation procedures relating to discovery or trial should not apply to this case*):

18. **Other issues**

- The party or parties request that the following additional matters be considered or determined at the case management conference (*specify*):

Given the current stay on discovery, we are looking at a potential trial date as late as 2017. A lifting of the discovery stay would allow for an earlier resolution of this matter.

19. **Meet and confer**

- a. The party or parties have met and conferred with all parties on all subjects required by rule 3.724 of the California Rules of Court (*if not, explain*):

- b. After meeting and conferring as required by rule 3.724 of the California Rules of Court, the parties agree on the following (*specify*):

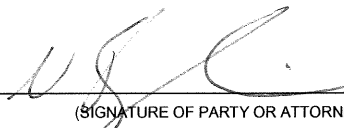
20. Total number of pages attached (*if any*): _____

I am completely familiar with this case and will be fully prepared to discuss the status of discovery and alternative dispute resolution, as well as other issues raised by this statement, and will possess the authority to enter into stipulations on these issues at the time of the case management conference, including the written authority of the party where required.

Date: 8/18/2015

Nadia Taghizadeh

 (TYPE OR PRINT NAME)

▶ 

 (SIGNATURE OF PARTY OR ATTORNEY)

 (TYPE OR PRINT NAME)

▶ _____
 (SIGNATURE OF PARTY OR ATTORNEY)

Additional signatures are attached.

PROOF OF SERVICE

JANICE DICKINSON v. WILLIAM H. COSBY, JR.
LASC No: BC 580909

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 20700 Ventura Blvd., Suite 301, Woodland Hills, CA 91364.

On August 18, 2015, I served the following document(s) described as: CASE MANAGEMENT STATEMENT on the interested parties in this action by placing a true and correct copy in an enclosed sealed envelope as follows:

Attorneys for Defendant;

Lynda B. Goldman, Esq.
Lavelly & Singer P.C.
2049 Century Park East, Suite 2400
Los Angeles, California 90067
Tel: (310) 556-3501
Fax: (310) 557-3615

Robert P. LoBue, Esq.
John P. Schmitt, Esq.
Patterson Belknap Webb & Tyler LLP
1133 Avenue of the Americas
New York, New York 10036
Tel: (212) 336-2000
Fax: (212) 336-2222


U.S. MAIL I am readily familiar with the firm's practice of collection and processing correspondence by mailing. Under that same practice it would be deposited with U.S. Postal Service on that same day with postage fully prepaid at Los Angeles, California in the ordinary course of business. Following that practice, I placed the foregoing document(s) for deposit and mailing in the United States Postal Service that same day with postage prepaid, sealed and addressed as set forth above, in the ordinary course of business.

BY FACSIMILE TRANSMISSION I caused the said document(s) to be transmitted to the office or residence of the addressee at the above referenced facsimile number.

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

Executed on August 18, 2015 at Los Angeles, California.

Marcelino Valencap
(Print or Type Name)


(Signature of Declarant)