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11 Alki David Productions, Inc. and FilmOn TV, Inc.

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **FOR THE COUNTY OF LOS ANGELES**
14 **CENTRAL DISTRICT**

15 MAHIM KHAN,

16 Plaintiff,

17 v.

18 HOLOGRAM USA, INC.; ALKI DAVID
19 PRODUCTIONS, INC.; FILMON TV, INC.;
20 ALKIVIADES ("ALKI") DAVID, an
21 individual; and DOES 1 through 25,

22 Defendants.

CASE NO. BC654017

Hon. Michelle W. Court
Dept. 74

**DEFENDANTS HOLOGRAM USA, INC.,
ALKI DAVID PRODUCTIONS, INC. AND
FILMON TV, INC.'S RESPONSE TO
MAHIM KHAN'S NOTICE OF
EVIDENCE SUBJECT TO COURT'S
GRANT OF PLAINTIFF'S MOTION IN
LIMINE TO EXCLUDE THIRD PARTY
WITNESSES AND DOCUMENTS NOT
DISCLOSED OR PRODUCED IN
DISCOVERY**

Action filed: March 14, 2017
FSC: October 23, 2019
Trial: October 28, 2019

1 Defendants Hologram USA, Inc., Alki David Productions, Inc. and FilmOn TV, Inc.
2 hereby submit their Response to Mahim Khan’s Notice of Evidence Subject to Court’s Grant of
3 Plaintiff’s Motion in Limine to Exclude Third Party Witnesses and Documents Not Disclosed or
4 Produced in Discovery.

5 I. THE DOCUMENTS IDENTIFIED BY PLAINTIFF WERE NOT
6 “WILLFULLY WITHHELD”, BUT PRODUCED

7 Well aware of the deep flaws in her case, Plaintiff is seeking an end run around
8 Defendants’ ability to present the evidence which will expose her claims for what they are – a
9 fiction created to exploit the very important ‘me too’ movement. On October 28, 2019, the
10 Court granted Plaintiff’s Motion in Limine No. 2 to exclude documents that were requested in
11 discovery but were “willfully withheld”:

12 And the second -- plaintiff’s second Motion in Limine is to preclude third party
13 witnesses and Documents that are not disclosed -- that were not disclosed in
14 discovery. And my tentative is to grant that, but only to the extent that that
15 evidence was Requested and not produced. I do think that based on my review of
16 the proceedings in the record I don't believe there has been a willful refusal to
17 respond to discovery. A refusal --a failure to respond to discovery can't be willful
18 if you didn't ask for it. So you're going to need -- if you want me to exclude
19 specific testimony or a specific evidence, I'm going to need to have evidence that
20 you actually asked for it and that it was willfully withheld. That's the tentative.

21 Incredibly, Plaintiff seeks to exclude documents that were not withheld, willfully or
22 otherwise, *but were produced*, as evidenced by Bates numbers affixed at the time of production.¹
23 Specifically, on September 19, 2019 (more than 30 days prior to trial), after Plaintiff prevailed on
24 a motion to compel, Defendants produced documents responsive to Plaintiff’s requests that were
25 in Defendants’ possession, custody or control. Declaration of Ellyn S. Garofalo (“Garofalo
26 Decl.”), ¶ 2. The Bates numbers, applied prior to their September 19, 2019 production, are
27 plainly reflected in Plaintiff’s motion to exclude the produced documents. *Id.* ¶ 3.

28 ¹ In contrast, Plaintiff affixed Bates numbers to documents that were not produced, but first
appeared on Plaintiff’s Exhibit List. Apparently, unfamiliar with the difference between Bates
stamps and Exhibit Nos., Plaintiff purportedly added Bates numbers to the documents as a
“convenience” at trial. In fact, the Bates stamps appear to have been added to deceive the Court
into believing the documents were actually produced during discovery.

1 A second set of documents was produced on October 21 and 22, 2019. These documents
2 were not called for in discovery, but relate to purported ‘me too’ witnesses, who first appeared
3 on Plaintiff’s October 16, 2019 Witness List. Garofalo Decl., ¶ 4. These documents are rebuttal
4 evidence, that may be used to cross-examine the newly identified ‘me too’ witnesses. *Id.*
5 Naturally, Defendants could not know the relevance of this material until Plaintiff added the ‘me
6 too’ witnesses on October 16, who were not identified by Plaintiff in discovery. Defendants are
7 not required to produce rebuttal evidence, but voluntarily produced the documents to Plaintiff.

8 Simply put, the Court’s order does not permit the exclusion of documents produced in
9 discovery (whether before or after the granting of a motion to compel), but to documents that
10 were “willfully withheld.” Plaintiff fails to explain how documents that were produced could
11 simultaneously be “willfully withheld” and, obviously, there is no authority which would permit
12 a court to exclude documents that were produced during discovery, on the ground that they were
13 not produced.

14 In fact, understandably anxious to avoid a real trial, Plaintiff has engaged in other
15 conduct in that raises serious ethical violations. Plaintiff forged the name of Defendants’ counsel
16 on an Exhibit List which added exhibits to Plaintiff’s list and deleted at least three of
17 Defendants’ exhibits.² Garofalo Decl., ¶ 6-8. Plaintiff merely removed the signature page from
18 the Exhibit List signed and approved by Defendant’s counsel, and appended it to a new Exhibit
19 List which Plaintiff filed without first providing it to Defendants’ counsel, much less seeking
20 consent or authorization to use counsel’s signature. *Id.*, ¶ 8. This conduct, is not merely
21 unethical, it is a felony. *See* Cal. Penal Code § 470(b) (forgery); Cal. Penal Code § 115 “(a)
22 Every person who knowingly procures or offers any false or forged instrument to be filed,
23 registered, or recorded in any public office within this state, which instrument, if genuine, might
24 be filed, registered, or recorded under any law of this state or of the United States, is guilty of a

25 _____

26 ² Plaintiff took advantage of Ms. Garofalo’s absence at the hearing – as a result of the Getty fire
27 which burned within yards of her home – to allow the Court to believe Defendants had agreed to
28 the filed Exhibit List. This is a truly stunning ethical violation by lawyers who are experienced
enough to know better.

1 felony”; Cal. Penal Code § 132 (“Every person who upon any trial, proceeding, inquiry, or
2 investigation whatever, authorized or permitted by law, offers in evidence, as genuine or true,
3 any book, paper, document, record, or other instrument in writing, knowing the same to have
4 been forged or fraudulently altered or ante-dated, is guilty of felony.”); *see also In re*
5 *Paguirigan*, 25 Cal. 4th 1, 3 (2001) (lawyer disbarred and subject to criminal proceedings for
6 forging a witness’s signature.)

7 To make matters worse, at an October 28, 2019 hearing, Plaintiff failed to notify the
8 Court that the filed Exhibit List was altered from the one that had been signed and thus approved
9 by Defendants’ counsel. This was nothing more than a fraud on the Court, not to mention
10 outright forgery. If this were not enough, Plaintiff also misled the Court on objections to a 1987c
11 notice, insisting that a motion to quash was required. This is simply false as the plain language
12 of the statute, provides that objections served on counsel are sufficient.

13 **II. THERE IS NO REQUIREMENT THAT DEFENDANTS IDENTIFY**
14 **REBUTTAL WITNESSES IN DISCOVERY.**

15 Plaintiff seeks to exclude witnesses who will rebut the testimony of Plaintiff and
16 witnesses that may be called by Plaintiff. These witnesses were included on Defendants’
17 witness list as anticipated rebuttal witnesses as Plaintiff had not yet provided any witness list to
18 Defendants by October 16, 2019. Additionally, prior to serving her Witness List, Plaintiff
19 refused to identify witnesses, including in response to Form Interrogatories served by Defendants
20 on – unbelievably – attorney-client privilege grounds:³

21 **INTERROGATORY NO. 12.1:**

22 State the name, ADDRESS, and telephone number of each individual:

- 23 (a) who witnessed the INCIDENT or the events occurring immediately
24 before or after the INCIDENT;
- 25 (b) who made any statement at the scene of the INCIDENT;
- 26 _____

27 ³ Plaintiff’s lawyer at the time, Barry Rothman, died unexpectedly. By the time replacement
28 counsel was retained, the time to file a motion to compel had expired.

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- (c) who heard any statements made about the INCIDENT by any individual at the scene;
- (d) who YOU OR ANYONE ACTING ON YOUR BEHALF claim has knowledge of the INCIDENT (except for expert witnesses covered by Code of Civil Procedure § 2034).


PLAINTIFF’S RESPONSE TO INTERROGATORY NO. 12.1:

In addition to the foregoing objections, Plaintiff objects to this interrogatory on the grounds that it seeks information that is protected from disclosure by the attorney-client privilege and the attorney work product doctrine. *Nacht & Lewis Architects Inc. v. Superior Court*, (1996) 47 Cal.App. 4th 214.

Defendants, of course, should not be penalized for failing to identify anticipated rebuttal witnesses, prior to Plaintiff’s identification of its witnesses in its Witness List on the eve of trial.

Dated: October 30, 2019

VENABLE LLP

By 

Ellyn S. Garofalo
Amir Kaltgrad
Attorneys for Defendants
HOLOGRAM USA, INC., ALKI DAVID
PRODUCTIONS, INC., AND
FILMON.TV, INC.

DECLARATION OF ELLYN S. GAROFALO

I, Ellyn S. Garofalo, declare as follows:

1. I am an attorney licensed to practice in the State of California. I am a partner with Venable LLP, counsel of record for Defendants Hologram USA, Inc., Alki David Productions, Inc. and FilmOn TV, Inc. As such, I am competent to testify to the matters set forth herein.

2. On September 19, 2019, I caused documents to be produced that were responsive to document requests propounded by Plaintiff Mahim Khan. The documents were produced after Plaintiff prevailed on a motion to compel. Prior to production, I had the documents Bates stamped to indicate the particular defendant producing the document, and a number by which the document could be identified as that produced by a defendant.

3. I have reviewed the documents that Plaintiff seeks to exclude in her Notice of Evidence Subject to Court's Grant of Plaintiff's Motion in Limine to Exclude Third Party Witnesses and Documents Not Disclosed or Produced in Discovery. I can tell from the Bates Nos. that these are documents that were produced to Plaintiff, in response to the enumerated discovery requests.

4. In addition, I caused a second set of documents to be produced to Plaintiff on October 21 and 22, 2019. These documents were not called for in discovery, but relate to purported 'me too' witnesses. Plaintiff first identified her "me too" witnesses on an October 16, 2019 Witness List. The documents produced by Defendants on October 21, 2019, are rebuttal evidence, that may be used to cross-examine the newly identified 'me too' witnesses. These documents became relevant only after the "me too" witnesses were identified in Plaintiff October 16, 2019 Witness List.

5. In discovery, and prior to her Witness List, Plaintiff refused to identify any witnesses. In her response to Form Interrogatory No. 12.1, Plaintiff asserted the attorney-client privilege as a reason to withhold the identity of her witnesses. At the time, Defendants were represented by Barry Rothman, who died unexpectedly. The time to move to compel responses to Interrogatory No. 12.1 expired before Defendants retained me to replace Ms. Rothman.

1 6. On October 23, 2019, Plaintiff emailed a proposed Exhibit List to my office.
2 After reviewing the Exhibit List, I signed the document and returned it to Plaintiff's counsel on
3 the understanding that it would be filed with the Court.

4 7. The Exhibit List that Plaintiff filed with the Court is not the Exhibit List I signed.
5 The filed Exhibit List (the "Forged List") includes a reference to a physician's notes which was
6 not included in the Exhibit List I signed, and deletes at least three of Defendants' exhibits that
7 were included in the Exhibit List I signed.

8 8. It appears that Plaintiff removed my signature page from the Exhibit List I
9 approved, and attached it to the Exhibit List Plaintiff filed. The filed list, was not provided to me
10 or any other person in my office, before it was filed with the Court. I did not authorize
11 Plaintiff's counsel to attach my signature page to filed Exhibit List.

12 9. I was unable to be in Court on Monday, October 28, 2019 due to an evacuation
13 caused by the Getty fire. I understand that Plaintiff took advantage of my absence to fail to
14 correct the Court's impression that I signed and approved the filed Exhibit List. This is false. A
15 true and correct copy of the Exhibit List I signed, with the transmittal email to Plaintiff's counsel
16 is attached and incorporated as Exhibit A hereto.

17 10. A true and correct copy of the Exhibit List filed by Plaintiff, with my signature
18 page attached, is attached and incorporated as Exhibit B hereto.

19

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

22

23 Executed on October 30, 2019, at Los Angeles, California.

24

25

26



Ellyn S. Garofalo

27

28

EXHIBIT “A”

Khatchikian, Rose

From: Khatchikian, Rose
Sent: Friday, October 25, 2019 3:32 PM
To: DLeal (DLeal@amglaw.com); Nathan Goldberg; Renee Mochkatel; DSpencer@amglaw.com
Cc: Garofalo, Ellyn S.; Kaltgrad, Amir; Angie Paz
Subject: RE: 139167.491786 Khan v Hologram USA, Inc, et al. (BC654017)
Attachments: Joint Exhibit List.pdf; Joint Witness List.pdf; Index of Joint and Disputed Jury Instructions.pdf; Joint and Disputed Jury Instructions.pdf

Attached are the four joint documents. Please forward the fully executed and conformed copies once you receive them back from the court.

Than kyou.

Rose R. Khatchikian
Legal Administrative Assistant to Ellyn S. Garofalo and Amir Kaltgrad
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13 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
14 FOR THE COUNTY OF LOS ANGELES
15

16 MAHIM KHAN,

17)
18) Plaintiff,

19) vs.
20)

21 HOLOGRAM USA, INC.; ALKI DAVID
22 PRODUCTIONS, INC.; FILMON TV,
INC.; ALKIVIADES ("ALKP") DAVID, an
23 individual and DOES 1 through 25,
inclusive,
24)

25) Defendants.
26)
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CASE NO: BC 654017
Hon. Michelle Williams Court - Dept. 74

JOINT EXHIBIT LIST

Trial Date: October 28, 2019
Time: 10:00 a.m.
Dept: 74

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TO THE COURT AND ALL ATTORNEYS OF RECORD:

Plaintiff Mahim Khan and Defendants Hologram USA, Inc., Alki David Productions, Inc.,
Filmon TV, Inc., and Alkiviades David by and through their respective attorneys of record hereby
submit their Joint Proposed Exhibit List. Plaintiff and Defendants reserve the right to amend their
Exhibit List or add additional documentary evidence to either debut evidence proffered by the
other party, including to impeach witnesses as necessary.

PLAINTIFF'S EXHIBITS

Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
100.	Mahim Khan's Resume FILMON0000013				
101.	09/24/14 Alki David Productions Khan paychex form ADP0000048				
102.	09/29/14 FilmOn TV and Mahim Khan Deal Memo FILMON0000021-24				
103.	09/29/14 Non-Disclosure Agreement FILMON0000025-27				
104.	12/23/14 e-mail from Alki David to Mahim Khan re MAHI KAT???? MK0001				
105.	Khan Insurance Info Alki David Productions 05/12/15 ADP0000153				
106.	06/29/15 Khan's Salary Addendum FilmOnTV Inc. FILMON0000002				
107.	7/8/15 E-mail from Yelena Calendar to employees re: Sick Leave Law MK0002-0004				

Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
108.	7/29/15 and 7/30/15 e-mails from Alki David to Mahim Khan and from Yelena Calendar re filmonstore.com MK0005-0006				
109.	8/28/15 e-mail from Mahim Khan to Gary Shoefield and reply from Shoefield MK0007				
110.	9/17/15 text messages between Mahim Khan and Britta Garsow MK0008-0013				
111.	9/18/15 text messages between Mahim Khan and Britta Garsow MK0014-0017				
112.	9/19/15 text messages between Mahim Khan and Britta Garsow MK0018-0025				
113.	9/20/15 text messages between Mahim Khan and Britta Garsow MK0026-0028				
114.	10/1; 10/2; 10/3; 10/5/15 text messages between Mahim Khan and Britta Garsow MK0029-0033				
115.	10/1/15 E-mail from Mahim Khan to Gary Shoefield and Yelena Calendar FILMON0000020				
116.	10/1/15 E-mail from Mahim Khan to Shoefield and Calendar; and response from Calendar MK0034-0035				

Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
117.	10/1/15 text message from Alki David to Mahim Khan MK0036				
118.	10/1-10/2/15 text messages between Mahim Khan and Masha Netsvetaeva MK0037-0038				
119.	10/1/15; 10/3/15 and 10/8/15 text messages between Mahim Khan and Gary Shoe field MK0039				
120.	10/2/15 Missed FaceTime call from Alki David MK0040				
121.	10/2/15; 10/5/15 text messages between Mahim Khan and Yelena Calendar MK0041				
122.	10/5/15 text message between David Nussbaum and Mahim Khan MK0042				
123.	Instagram Post by Alki David and message to Mahim Khan Oct 2015 MK0043-0044				
124.	Picture/poster: "Her-ASS 'We Will Give You Just The Tip' HR Headquarters Alli Botto Janel Bauer" MK0045				
125.	Instagram Post by Alli Botto re: "Her-Ass" MK0046				
126.	Instagram story video post by Alli Botto 10/4/19				

Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
127.	Mahim Khan Photographs				
128.	Correspondence between Alexander, Krakow & Glick and Barry Rothman MK0047-0108				
129.	5/1/17 Cross Complaint by Alkiviades David v. Mahim Khan, Tracy Fehr, Alexander Krakow & Glick				
130.	CV - Dr. Anthony Reading				
131.	CV - Stephanie Rizzardi				
132.	Paycheck copies; pay stubs; W-2 Mahim Khan MK0109-0120				
133.	Alki David Instagram post "#Fuckmetoo gloria.allred: David Depo vol. 2, Exh. 26)				
134.	Alki David Instagram post "#WHYME": David Depo vol. 2, Exh. 28				
135.	Alki David's instagram post dated January 2, 2016 titled "When you play with your vagina for the first time. (David Depo, vol. 2, Exhibit 7)				
136.	Alki David's instagram post of photo wearing wife's shorts - Fuck Off (David Depo, vol. 2, Exhibit 9) Dated June 28, 2015				
137.	Alki David's instagram photo post (David Depo, vol. 2, Exhibit 10)				
138.	Photo of Alki David in the gym with an erect penis (David Depo, vol. 2, Exhibit 11)				

Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
139.	Alki David's instagram post of two naked men having sex (David Depo, vol. 2, Exhibit 13)				
140.	Alki David's instagram post titled "Tag a Mate That Loves Cupcakes" (David Depo, vol. 2, Exhibit 14)				
141.	Alki David instagram post of a picture of a pig with large testicles (David Depo, vol. 2, Exhibit 15)				
142.	Alki David instagram post of a picture of David and woman (David Depo, vol. 2, Exhibit 16)				
143.	Alki David instagram post of picture of David in the bath with hand up in the air and the other is taking a photo (David Depo, vol. 2, Exhibit 17)				
144.	Picture of stripper and someone else - Kim's birthday party (David Depo, vol. 2, Exhibit 19)				
145.	Picture of candy and box of condom (David Depo, vol. 2, Exhibit 20)				
146.	Picture of Alki David taken by Layla - posted on instagram (David Depo, vol. 2, Exhibit 23)				
147.	Alki David's instagram post of him holding a sign that says "Fucker In Charge of you fucking fucks" (David Depo, vol. 2, Exhibit 24) Dated February 22, 2017				
148.	Alki David's instagram post #Fuckmetoo (David Depo, vol. 2, Exhibit 27)				

Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
149.	Law360 article 10/11/19 - statement by Alki David				
150.	11/6/12 Complaint: <u>Monica D'Onofrio v. Alki David Productions, Inc., Filmon.com Inc., and Alkiviades David</u> , BC 495165				
151.	6/2/16 Complaint: <u>Mary Rizzo v. Alkiviades David; Anakando Media Holdings, Inc., Filmon Media Holdings Inc., Anakando Media Group USA</u>				
152.	2/2/17 Complaint: <u>Elizabeth Taylor and Chastity Jones v Alkiviades David et al</u> BC 649025				
153.	<u>Jones v. Alkiviades David et al. Amended Judgment on Special Verdict Upon Acceptance of Remittitur</u> 9/26/19				
154.	1/6/17 First Amended Complaint <u>Lauren Reeves v. Hologram USA, Inc. Alki David Productions, Inc., Alkiviades David</u> BC 643099				
155.	<u>Reeves v. Hologram USA, Inc. et al. Special Verdict (Phase I) 10/11/19 and Special Verdict (Phase II) 10/15/19</u>				
156.	11 second segment from "Lord of the Freaks; There's a Madness to his Method"				
157.	Trailer from "Lord of the Freaks"				
158.	Video of Alkiviades David - "Mangina"				

Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
159.	Video of Alkiviades David "apples/banana". Posted October 17, 2016				
160.	Photo titled "2 Girls, 1 cup - Cake"				
161.	10/18/19 Alki David Instagram story video				
162.	U.S. Securities and Exchange Commission, Form A-1 for Hologram USA Networks Inc. Filed on 3/13/18				
163.	Hologram USA Initial Public Offering 1/18				
164.	U.S. Securities and Exchange Commission, Form S-1 Registration Statement for Fotv Media Networks Inc., Filed 8/12/16				
165.	FilmOn TV Networks Code of Ethics and Business Conduct Filed With U.S. Securities and Exchange Commission 8/12/16				
166.	FilmOn TV Networks Code of Ethics for CEO and Senior Financial Officers Filed With U.S. Securities and Exchange Commission 8/12/16				
167.	U.S. Securities and Exchange Commission, Form 10-Q Quertely Report for Period Ending 6/30/16				
168.	U.S. Securities and Exchange Commission, Form FWP FOTV Media Networks, Inc. Filing Under Securities Act Rule 163/433 of Free Writing Prospectuses. Submitted 9/20/16				

Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
169.	9/27/19 Complaint Case no. CV09013: <u>Securities and Exchange Commission Against Alkiviades David and Hologram USA Networks Inc.</u>				
170.	FilmOn Policies and Procedures FILMON0000054-56				
171.	FilmOn TV Sexual Harassment Policy FILMON0000040-41				
172.	FilmOn TV Sexual Harassment Policy FILMON0000063-64				
173.	FilmOn Policies and Procedures FILMON0000065-67				
174.	FilmOn Policies and Procedures FILMON0000068-70				
175.	FilmOn Company Policies and Procedures FILMON0000071-73				
176.	Password Construction Guidelines (updated Jan 2016) FILMON0000045-47				
177.	Password Construction Guidelines updated Jan. 2016 FILMON0000060-62				
178.	Password Construction Guidelines updated Jan. 2016 FILMON0000074-76				
179.	Email Policy updated Jan. 2016 FILMON0000051-53				
180.	Email Policy - updated Jan. 2016 FILMON0000057-59				

Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
181.	Employee List 08/29/14 ADP0000019-21				
182.	08/29/14 Employees ADP0000042-44				
183.	Alki David Productions Payroll Info 12/21/14 ADP 0000029				
184.	FilmOn and Alki David Productions 01/02/15 payroll info ADP0000025-29				
185.	Alki David Productions Salary Info 03/27/15 ADP0000037-38				
186.	FilmOn Employee Salary Info 03/27/15 ADP0000039				
187.	Alki David Productions and FilmOn TV 03/27/15 check date ADP0000040- 41				
188.	Payroll Info Blue Velvet Productions ADP0000022-24				
189.	Blue Velvet Productions/FilmOn TV ADP0000045-47				
190.	Hologram USA, Inc.'s Response to Plaintiff's Request for Production of Documents, (Set One) dated December 19, 2018				
191.	Hologram USA, Inc.'s Response to Plaintiff's Special Interrogatories, (Set One) dated December 19, 2018				
192.	Hologram USA, Inc.'s Response to Plaintiff's Form Interrogatories - General (Set One) dated December 19, 2018				

Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
193.	Hologram USA, Inc.'s Response to Plaintiff's Form Interrogatories - Employment Law (Set One) dated December 19, 2018				
194.	Alki David Productions, Inc.'s Response to Plaintiff's Request for Production of Documents, Set No. 1 dated December 19, 2018				
195.	Alki David Productions, Inc.'s Response to Plaintiff's Special Interrogatories, Set No. 1 dated December 19, 2018				
196.	Alki David Productions, Inc.'s Response to Plaintiff's Form Interrogatories - General, Set One dated December 19, 2018				
197.	Alki David Productions, Inc.'s Response to Plaintiff's Form Interrogatories - Employment Law, Set One dated December 19, 2018				
198.	Alkiviades David's Response to Plaintiff's Request for Production of Documents, Set No. 1 dated December 19, 2018				
199.	Alkiviades David's Response to Plaintiff's Special Interrogatories, Set No. 1 dated December 19, 2018				
200.	Alkiviades David's Response to Plaintiff's Form Interrogatories - General, Set One dated December 19, 2018				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
201.	Alkiviades David's Response to Plaintiff's Form Interrogatories - Employment Law, Set One dated December 19, 2018				
202.	FilmOn TV, Inc.'s Response to Plaintiff's Request for Production of Documents, Set No. 1 dated December 19, 2018				
203.	FilmOn TV, Inc.'s Response to Plaintiff's Special Interrogatories, Set No. 1 dated December 19, 2018				
204.	FilmOn TV, Inc.'s Response to Plaintiff's Form Interrogatories - General, Set No. 1 dated December 19, 2018				
205.	FilmOn TV, Inc.'s Response to Plaintiff's Form Interrogatories - Employment Law, Set No. 1 dated December 19, 2018				
206.	Hologram USA, Inc.'s Supplemental Responses to Plaintiff's Request for Production of Documents, Set No. 1 dated February 19, 2019				
207.	Hologram USA, Inc.'s Supplemental Responses to Plaintiff's Special Interrogatories, Set No. 1 dated February 19, 2019				
208.	Hologram USA, Inc.'s Supplemental Response to Plaintiff's Form Interrogatories - General, Set One dated February 25, 2019				

Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
209.	Hologram USA, Inc.'s Supplemental Response to Plaintiff's Form Interrogatories - Employment Law, Set One dated February 25, 2019				
210.	Alki David Productions, Inc.'s Supplemental Responses to Plaintiff's Request for Production of Documents, Set No. 1 dated February 19, 2019				
211.	Alki David Productions, Inc.'s Supplemental Responses to Plaintiff's Special Interrogatories, Set No. 1 dated February 19, 2019				
212.	Alki David Productions, Inc.'s Supplemental Response to Plaintiff's Form Interrogatories - General, Set One dated February 25, 2019				
213.	Alki David Productions, Inc.'s Supplemental Response to Plaintiff's Form Interrogatories, Employment Law, Set One dated February 25, 2019				
214.	Alkiviades David's Supplemental Responses to Plaintiff's Request for Production of Documents, Set No. 1 dated February 19, 2019				
215.	Alkiviades David's Supplemental Responses to Plaintiff's Special Interrogatories, Set No. 1 dated February 19, 2019				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
216.	Alkiviades David's Supplemental Response to Plaintiff's Form Interrogatories - General, Set One dated February 25, 2019				
217.	Alkiviades David's Supplemental Response to Plaintiff's Form Interrogatories - Employment Law, Set One dated February 25, 2019				
218.	FilmOn TV, Inc.'s Supplemental Responses to Plaintiff's Request for Production of Documents, Set No. 1 dated February 19, 2019				
219.	FilmOn TV, Inc.'s Supplemental Responses to Plaintiff's Special Interrogatories, Set No. 1 dated February 19, 2019				
220.	FilmOn TV, Inc.'s Supplemental Responses to Plaintiff's Form Interrogatories - General, Set One dated February 25, 2019				
221.	FilmOn TV, Inc.'s Supplemental Responses to Plaintiff's Form Interrogatories - Employment Law, Set One dated February 25, 2019				
222.	Alkiviades David's Response to Plaintiff's Request for Admissions, Set No. 1 dated April 12, 2019				
223.	Hologram USA, Inc.'s Response to Plaintiff's Request for Production of Documents, Set No. 2 dated July 12, 2019				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
224.	Alki David Productions, Inc.'s Response to Plaintiff's Request for Production of Documents, Set No. 2 dated July 12, 2019				
225.	Alkiviades David's Response to Plaintiff's Request for Production of Documents, Set No. 2 dated July 12, 2019				
226.	FilmOn TV, Inc.'s Response to Plaintiff's Request for Production of Documents, Set No. 2 dated July 12, 2019				
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DEFENDANT'S EXHIBIT LIST

Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
501.	Mahim Khan FilmOn.TV Employee File (FILMON0000003-20)				
502.	Mahim Khan Employee Deal Memo, dated September 29, 2014 (FILMON0000021-27)				
503.	Alki David Productions Inc. Team Member Handbook, approved 11/15/2012 (Alki David Productions 0000050-0000152)				
504.	2016 FilmOn Policies and Procedures (AD00245-AD000247)				
505.	FilmOn.TV, Inc. and Alki David Productions, Inc. Draft Policies and Procedures, undated (FILMON0000065-067)				
506.	FilmOn.TV Sexual Harassment Policy (FILMON0000063-064)				
507.	FilmOn Draft Email Policy (FILMON0000051-053)				
508.	FOTV Media Networks, Inc. Employee Handbook dated 11/22/2017 (AD00248- AD00306)				
509.	Plaintiff Mahim Khan's Objections And Responses To Defendant Hologram USA, INC.'s First Set Of Form Interrogatories - General, served June 28, 2017				

Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
510.	Lauren Reeves Instagram post: "Real quick, is my boner showing?" dated 05/28/2014 (AD00307)				
511.	Lauren Reeves Twitter post: "It gets drunk out early now" dated 11/06/2015 (AD00308)				
512.	Lauren Reeves Instagram post: "I put together a PowerPoint..." dated 1/16/2016 (AD00309)				
513.	Lauren Reeves Twitter post: "I picked this nectarine up..." dated 05/29/2016 (AD00310)				
514.	Lauren Reeves Twitter post: "Goodbye to a girl's best friend..." dated 06/28/2016 (AD00311-AD00321)				
515.	Lauren Reeves Twitter post: "My sweet dog..." dated 06/28/2016 (AD00322)				
516.	Lauren Reeves Twitter post: "How depressed are you..." dated 08/01/2016 (AD00323)				
517.	Lauren Reeves Twitter post: "Suicide is never the answer..." dated 08/03/2016 (AD00324)				
518.	Lauren Reeves Twitter post: "Just heard about a guy..." dated 8/29/2016 (AD00325)				
519.	Lauren Reeves Twitter post: "Me: '...then I overheard these girls..." dated 8/29/2016 (AD00326)				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
520.	Lauren Reeves Twitter post: "Grab our pussy" dated 10/07/2016 (AD00327)				
521.	Lauren Reeves Twitter post: "I've made some mistakes" dated 11/3/2016 (AD00328)				
522.	Lauren Reeves Twitter post: "Legal Contract: Thanksgiving" dated 11/14/2016 (AD00329-AD00331)				
523.	Lauren Reeves Twitter post: "Everybody be quiet!" dated 12/26/2016 (AD00332)				
524.	Lauren Reeves Twitter post: "Hey 2016, you also killed my dog..." dated 12/30/2016 (AD00333)				
525.	Lauren Reeves Twitter post: "Wow, Donald Trump has completely ruined..." dated 01/10/2017 (AD00334)				
526.	Lauren Reeves Twitter post: "Watching Tombstone on my flight..." dated 02/26/2017 (AD00335)				
527.	Lauren Reeves Twitter post: "To be fair, who HASN'T lied under oath..." dated 03/01/2017 (AD00336)				
528.	Lauren Reeves Twitter post: "One time I went without health insurance..." dated 03/07/2017 (AD00337)				

Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
529.	Lauren Reeves Twitter post: "Have you or a loved one suffered unfair prejudice..." dated 04/11/2017 (AD00338)				
530.	Lauren Reeves Twitter post: @realDonaldTrump - I can't help but notice...dated 05/08/2017 (AD00339)				
531.	Lauren Reeves Twitter post: "Thank you Donald Trump for inspiring..." dated 05/22/2017 (AD00340)				
532.	Lauren Reeves Twitter post: "Beautiful sunset tonight" dated 07/09/2017 (AD00341)				
533.	Lauren Reeves Twitter post: "I don't want to picture Steve Bannon..." dated 07/27/2017 (AD00342)				
534.	Lauren Reeves Twitter post: "Second night in a row my dog..." dated 08/23/2017 (AD00343)				
535.	Lauren Reeves Twitter post: "I'm not a big birthday person..." dated 09/04/2017 (AD00344)				
536.	Lauren Reeves Twitter post: "I'm not writing a #MeToo post..." dated 10/17/2017 (AD00345)				
537.	Lauren Reeves Instagram post: "Desk sign dated 10/15/2018 (AD00346)				

Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
538.	Screen Shot Of Text Message With Chasity Jones (1:22 p.m.) (AD00001)				
539.	Screen Shot Of Text Message With Chasity Jones (5:51 p.m.) (AD00002)				
540.	Screen Shot Of Text Message With Chasity Jones (5:30 p.m.) (AD00003)				
541.	Screen Shot Of Text Message With Chasity Re: Going Home (AD00004)				
542.	Declaration of Chastity Jones (AD00005-AD00006)				
543.	Screen Shot of Text Message to Mary Rizzo (AD00007-AD00014)				
544.	Screen Shot of Text Message to Mary Rizzo (AD00011-AD00012)				
545.	Text Messages from Mary Rizzo to Chasity Jones (AD00013-AD00020)				
546.	Screen Shot of March 17, 2015 Instagram Post by chasityjones (AD00021)				
547.	Screen Shot of March 10, 2015 Instagram Post by chasityjones (AD00022)				
548.	Handwritten Message from Chasity Jones to Alki David (AD00023)				
549.	Screen Shot Of Text Messages To "Carl Manager" (AD00024)				

Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
550.	Screen Shot of Text Messages to "MK" (AD00032-AD00047)				
551.	Screen Shot Of January 21, 2015 Instagram Post by eliztaylor (AD00048)				
552.	February 3, 2016 Letter from Department of Fair Employment and Housing Re: DFEH Matter Number 739969-207321 with enclosures (AD00049-AD00056)				
553.	Screen Shot Of Text Messages between Mary Rizzo and Elizabeth Taylor (3:19 p.m.) (AD00057-AD00059)				
554.	Screen Shot Of Text Messages between Mary Rizzo and Chasity Jones (12:41 a.m.) (AD00060-AD00061)				
555.	Screen Shot Of Text Messages between Mary Rizzo and Chasity Jones (12:39 a.m.) (AD00062)				
556.	Screen Shot Of Text Messages between Mary Rizzo and Chasity Jones (8:27 a.m.) (AD00063)				
557.	Screen Shot Of Text Messages between Mary Rizzo and Chasity Jones (5:00 p.m.) (AD00064)				
558.	Screen Shot Of Text Messages between Mary Rizzo and Chasity Jones (8:49 p.m.) (AD00065)				
559.	Screen Shot Of Text Messages between Mary Rizzo and Chastity Jones (9:49 a.m.) (AD00066-AD00067)				

Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
560.	Screen Shot Of Text Messages between Mary Rizzo and Chasity Jones at chasityjones@yahoo.com (AD00068)				
561.	Screen Shot Of December 30, 2016 Instagram Post by chasityjones (AD00069)				
562.	Screen Shot Of February 16, 2018 Instagram Post by chasityjones (AD00070)				
563.	Screen Shot Of January 2, 2018 Instagram Post by chasityjones (AD00071)				
564.	Screen Shot Of April 1, 2018 Instagram Post by chasityjones (AD00072)				
565.	Screen Shot Of August 20, 2018 Instagram Post by chasityjones (AD00073)				
566.	January 31, 2017 Letter from Department of Fair Employment and Housing Re: DFEH Matter Number 852881-272913 with enclosures (AD00074-AD00081)				
567.	Screen Shot Of August 9, 2016 Instagram Post by eliztaylor (AD00082)				
568.	Screen Shot Of August 24, 2016 Instagram Post by eliztaylor (AD00083)				
569.	Screen Shot Of August 28, 2016 Instagram Post by eliztaylor (AD00084)				

Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
570.	Screen Shot Of September 2, 2016 Instagram Post by eliztaylor (AD00085)				
571.	Screen Shot Of April 10, 2017 Instagram Post by eliztaylor (AD00086)				
572.	Screen Shot Of August 4, 2017 Instagram Post by eliztaylor (AD00087)				
573.	Screen Shot of August 24, 2017 (AD00088)				
574.	Screen Shot Of August 25, 2017 Instagram Post by eliztaylor (AD00089)				
575.	Screen Shot Of August 31, 2017 Instagram Post by eliztaylor (AD00090)				
576.	Screen Shot Of September 5, 2017 Instagram Post by eliztaylor (AD00091)				
577.	Screen Shot Of September 30, 2017 Instagram Post by eliztaylor (AD00092)				
578.	Screen Shot Of October 25, 2017 Instagram Post by eliztaylor (AD00093)				
579.	Screen Shot Of December 27, 2017 Instagram Post by eliztaylor (AD00094)				
580.	Screen Shot Of January 6, 2018 Instagram Post by eliztaylor (AD00095)				
581.	Screen Shot Of April 9, 2018 Instagram Post by eliztaylor (AD00096)				
582.	Screen Shot Of May 8, 2018 Instagram Post by eliztaylor (AD00097)				

Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
583.	Screen Shot Of July 13, 2018 Instagram Post by eliztaylor (AD00098)				
584.	Screen Shot Of October 26, 2018 Instagram Post by eliztaylor (AD00099)				
585.	Screen Shot Of December 4, 2018 Instagram Post by eliztaylor (AD00100)				
586.	Screen Shot Of December 9, 2018 Instagram Post by eliztaylor (AD00101)				
587.	Screen Shot Of December 9, 2018 Instagram Post by eliztaylor (AD00102)				
588.	Screen Shot Of December 17, 2018 Instagram Post by eliztaylor (AD00103)				
589.	Screen Shot Of January 13, 2019 Instagram Post by eliztaylor (AD00104)				
590.	Screen Shot Of January 17, 2019 Instagram Post by eliztaylor (AD00105)				
591.	Screen Shot Of April 20, 2019 Instagram Post by eliztaylor (AD00106)				
592.	Video Entitled "LORD of the FREAKS Official Red Band Trailer" Link: https://youtu.be/iz3kaMuyyk8 (AD00107)				
593.	February 1, 2017 Letter from Dept. of Fair Employment and Housing Re: DFEH Matter Number 852606-272658 (AD00108-AD00115)				

Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
594.	Screen Shot Of December 24, 2018 Instagram Post by chastityjones (AD00116)				
595.	Screen Shot Of April 8th Instagram Post by chasityjones (AD00117)				
596.	Screen Shot Of February 17th Instagram Post by chasityjones (AD00118)				
597.	Screen Shot Of February 13th Instagram Post by chasityjones (AD00119)				
598.	Screen Shot Of February 2nd Instagram Post by chasityjones (AD00120)				
599.	Screen Shot Of January 1st Instagram Post by chasityjones (AD00121)				
600.	Screen Shot Of December 16, 2018 Instagram Post by chasityjones (AD00122)				
601.	Screen Shot Of December 7, 2018 Instagram Post by chasityjones (AD00123)				
602.	Screen Shot Of November 17, 2018 Instagram Post by chasityjones (AD00124)				
603.	Screen Shot Of November 5, 2018 Instagram Post by chasityjones (AD00125)				
604.	Screen Shot Of October 31, 2018 Instagram Post by chasityjones (AD00126)				

Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
605.	Screen Shot Of October 19, 2018 (AD00127)				
606.	Screen Shot Of October 13, 2018 Instagram Post by chasityjones (AD00128)				
607.	Screen Shot Of October 1, 2018 Instagram Post by chasityjones (AD00129)				
608.	Screen Shot Of September 9, 2018 Instagram Post by chasityjones (AD00130)				
609.	Screen Shot Of August 25, 2018 Instagram Post by chasityjones (AD00131)				
610.	Screen Shot Of July 24, 2018 Instagram Post by chasityjones (AD00132)				
611.	Screen Shot Of July 22, 2018 Instagram Post by chasityjones (AD00133)				
612.	Screen Shot Of April 20, 2018 Instagram Post by chasityjones (AD00134)				
613.	Screen Shot Of February 17, 2018 Instagram Post by chasityjones (AD00135)				
614.	Screen Shot Of January 11, 2018 Instagram Post by chasityjones (AD00136)				
615.	Screen Shot Of January 11, 2018 Instagram Post by chasityjones (AD00137)				

Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
616.	Screen Shot Of January 11, 2018 Instagram Post by chasityjones (AD00138)				
617.	Screen Shot Of November 8, 2016 Instagram Post by chasityjones (AD00139)				
618.	Screen Shot Of October 28, 2016 Instagram Post by chasityjones (AD00140)				
619.	Diagram of Hologram Presentation (AD00141)				
620.	Foxwood / Hologram agreement by Chasity Jones (dated March 23, 2016) (AD00142-AD00150)				
621.	Elizabeth Taylor employee file for FilmOn.TV (AD00151-AD00175)				
622.	Chasity Jones employee file for FilmOn.TV (AD00176-AD00200)				
623.	Elizabeth Taylor email to Yelena Calendar (dated June 1, 2015) (AD00201-AD00206)				
624.	Screen Shot Of Text Messages between Elizabeth Taylor and Carl Dawson (AD00207-AD00214)				
625.	Screen Shot Of Text Messages between Elizabeth Taylor and Mahim Khan (MK) (AD00215-AD00230)				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
626.	Screen Shot Of Text Messages between Chastity Jones and Mary Rizzo (AD00231-AD00244)				
627.	Screen Shot of March 14, 2019 Instagram Post by eliztaylor; link: https://www.instagram.com/p/BvA9DKbF2Ja/?utm_source=ig_web_copy_link (AD00347)				
628.	Screen Shot of May 5, 2019 Instagram Post by chasityjones; Link: https://www.instagram.com/p/BxFtrFonpXo/?utm_source=ig_web_copy_link (AD00348)				
629.	Instagram video posted on May 7, 2019 by chasityjones; Link: https://www.instagram.com/p/BxK-qr1lxoP/?utm_source=ig_web_copy_link (AD00349)				
630.	Screen Shot of May 16, 2019 Instagram Post by chasityjones; Link: https://www.instagram.com/p/Bxi4sAQAcYB/?utm_source=ig_web_copy_link (AD00350)				
631.	Screen Shot of July 16, 2019 Instagram Post by chasityjones; Link: https://www.instagram.com/p/Bz_MXFzlg2X/?utm_source=ig_web_copy_link (AD00351)				
632.	Instagram video posted on July 31, 2019 by chasityjones; Link: https://www.instagram.com/p/B0mgTk8A4FG/?utm_source=ig_web_copy_link (AD00352)				

Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
633.	Screen Shot of August 5, 2019 Instagram Post by chasityjones; Link: https://www.instagram.com/p/B0yf2_WA1-v/?utm_source=ig_web_copy_link (AD00353)				
634.	Screen Shot of August 7, 2019 Instagram Post by chasityjones; Link: https://www.instagram.com/p/B03tDA4ACsS/?utm_source=ig_web_copy_link (AD00354)				
635.	Screen Shot of August 13, 2019 Instagram Post by chasityjones; Link: https://www.instagram.com/p/B1HY634A62H/?utm_source=ig_web_copy_link (AD00355)				
636.	Screen Shot of September 3, 2019 Instagram Post by chasityjones; Link: https://www.instagram.com/p/B19NQjpA35Y/?utm_source=ig_web_copy_link (AD00356)				
637.	Screen Shot of September 6, 2019 Instagram Post by chasityjones; Link: https://www.instagram.com/p/B2EfbdiAD_/?utm_source=ig_web_copy_link (AD00357)				
638.	Instagram video posted on September 11, 2019 by chasityjones; Link: https://www.instagram.com/p/B2Rs0_IAUTw/?utm_source=ig_web_copy_link (AD00358)				

Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
639.	Screen Shot of September 21, 2019 Instagram Post by chasityjones (AD00359)				
640.	Instagram video posted on October 1, 2019 by chasityjones; Link: https://www.instagram.com/p/B3Fa0cPgaS9/?utm_source=ig_web_copy_link (AD00360)				
641.	Video of Alki David playfully attacking FilmOn TV crew (AD00361)				
642.	Screenshot of photograph of Mahim Khan (AD00362)				
643.	Screenshot of Mahim Khan iMessages, dated 7/26/2015 to 11/9/2015. (AD00363)				
644.	Screenshot of Mahim Khan iMessages, dated 7/9/2015 to 7/26/2015 (AD00366)				
645.	Screenshot of Mahim Khan iMessages, dated 7/26/2015 to 10/6/2015 (AD00367)				
646.	May 2, 2016 email from Tracy L. Fehr to Mahim Khan re: five declarations (AD00365)				
647.	Screenshot of Mahim Khan Photograph (AD00364)				
648.	Screenshot of Mahim Khan Photograph (AD00368)				
649.	Screenshot of Mahim Khan Photograph (AD00369)				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
650.	Screenshot of Mahim Khan Photograph (AD00370)				

DATED: October __, 2019

ALLRED, MAROKO & GOLDBERG

By: _____
NATHAN GOLDBERG
DOLORES Y. LEAL
RENEE MOCHKATEL
Attorneys for Plaintiff,
MAHIM KHAN

DATED: October __, 2019

VENABLE LLP


By: 
ELLYN S. GAROFALO
AMIR KALTGRAD
Attorneys for Defendants
HOLOGRAM USA, INC., et al.

EXHIBIT “B”

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13 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
14 FOR THE COUNTY OF LOS ANGELES
15

16 MAHIM KHAN,

17)
18) Plaintiff,

19) vs.
20)

21 HOLOGRAM USA, INC.; ALKI DAVID
22 PRODUCTIONS, INC.; FILMON TV,
23 INC.; ALKIVIADES ("ALKI") DAVID, an
individual and DOES 1 through 25,
24 inclusive,

25) Defendants.
26)
27)
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CASE NO: BC 654017

Hon. Michelle Williams Court - Dept. 74

JOINT EXHIBIT LIST

Trial Date: October 28, 2019
Time: 10:00 a.m.
Dept: 74

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TO THE COURT AND ALL ATTORNEYS OF RECORD:

Plaintiff Mahim Khan and Defendants Hologram USA, Inc., Alki David Productions, Inc.,
Filmon TV, Inc., and Alkiviades David by and through their respective attorneys of record hereby
submit their Joint Proposed Exhibit List. Plaintiff and Defendants reserve the right to amend their
Exhibit List or add additional documentary evidence to either debut evidence proffered by the
other party, including to impeach witnesses as necessary.

PLAINTIFF'S EXHIBITS

Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
100.	Mahim Khan's Resume FILMON0000013				
101.	09/29/14 Alki David Productions Khan paychex form ADP0000048				
102.	09/29/14 FilmOn TV and Mahim Khan Deal Memo FILMON0000021-24				
103.	09/29/14 Non-Disclosure Agreement FILMON0000025-27				
104.	12/23/14 e-mail from Alki David to Mahim Khan re MAHI KAT???? MK0001				
105.	Khan Insurance Info Alki David Productions 05/12/15 ADP0000153				
106.	06/29/15 Khan's Salary Addendum FilmOnTV Inc. FILMON0000002				
107.	7/8/15 E-mail from Yelena Calendar to employees re: Sick Leave Law MK0002-0004				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
108.	7/29/15 and 7/30/15 e-mails from Alki David to Mahim Khan and from Yelena Calendar re filmonstore.com MK0005-0006				
109.	8/28/15 e-mail from Mahim Khan to Gary Shoefield and reply from Shoefield MK0007				
110.	9/17/15 text messages between Mahim Khan and Britta Garsow MK0008-0013				
111.	9/18/15 text messages between Mahim Khan and Britta Garsow MK0014-0017				
112.	9/19/15 text messages between Mahim Khan and Britta Garsow MK0018-0025				
113.	9/20/15 text messages between Mahim Khan and Britta Garsow MK0026-0028				
114.	10/1; 10/2; 10/3; 10/5/15 text messages between Mahim Khan and Britta Garsow MK0029-0033				
115.	10/1/15 E-mail from Mahim Khan to Gary Shoefield and Yelena Calendar FILMON0000020				
116.	10/1/15 E-mail from Mahim Khan to Shoefield and Calendar; and response from Calendar MK0034-0035				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
117.	10/1/15 text message from Alki David to Mahim Khan MK0036				
118.	10/1-10/2/15 text messages between Mahim Khan and Masha Netsvetaeva MK0037-0038				
119.	10/1/15; 10/3/15 and 10/8/15 text messages between Mahim Khan and Gary Shoefield MK0039				
120.	10/2/15 Missed FaceTime call from Alki David MK0040				
121.	10/2/15; 10/5/15 text messages between Mahim Khan and Yelena Calendar MK0041				
122.	10/5/15 text message between David Nussbaum and Mahim Khan MK0042				
123.	Instagram Post by Alki David and message to Mahim Khan Oct 2015 MK0043-0044				
124.	Picture/poster: "Her-ASS 'We Will Give You Just The Tip' HR Headquarters Alli Botto Janel Bauer" MK0045				
125.	Instagram Post by Alli Botto re: "Her-Ass" MK0046				
126.	Instagram story video post by Alli Botto 10/4/19				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
127.	Mahim Khan Photographs				
128.	Correspondence between Alexander, Krakow & Glick and Barry Rothman MK0047-0108				
129.	5/1/17 Cross Complaint by Alkiviades David v. Mahim Khan, Tracy Fehr, Alexander Krakow & Glick				
130.	CV - Dr. Anthony Reading				
131.	Dr. Reading documents				
132.	CV - Stephanie Rizzardi				
133.	Paycheck copies; pay stubs; W-2 Mahim Khan MK0109-0120				
134.	Alki David Instagram post "#Fuckmetoo gloria.allred: David Depo vol. 2, Exh. 26)				
135.	Alki David Instagram post "#WHYME": David Depo vol. 2, Exh. 28				
136.	Alki David's Instagram post dated January 2, 2016 titled "When you play with your vagina for the first time. (David Depo, vol. 2, Exhibit 7)				
137.	Alki David's Instagram post of photo wearing wife's shorts - Fuck Off (David Depo, vol. 2, Exhibit 9) Dated June 28, 2015				
138.	Alki David's Instagram photo post (David Depo, vol. 2, Exhibit 10)				
139.	Photo of Alki David in the gym with an erect penis (David Depo, vol. 2, Exhibit 11)				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
140.	Alki David's Instagram post of two naked men having sex (David Depo, vol. 2, Exhibit 13)				
141.	Alki David's Instagram post titled "Tag a Mate That Loves Cupcakes" (David Depo, vol. 2, Exhibit 14)				
142.	Alki David Instagram post of a picture of a pig with large testicles (David Depo, vol. 2, Exhibit 15)				
143.	Alki David Instagram post of a picture of David and woman (David Depo, vol. 2, Exhibit 16)				
144.	Alki David Instagram post of picture of David in the bath with hand up in the air and the other is taking a photo (David Depo, vol. 2, Exhibit 17)				
145.	Picture of stripper and someone else - Kim's birthday party (David Depo, vol. 2, Exhibit 19)				
146.	Picture of candy and box of condom (David Depo, vol. 2, Exhibit 20)				
147.	Picture of Alki David taken by Layla - posted on Instagram (David Depo, vol. 2, Exhibit 23)				
148.	Alki David's Instagram post of him holding a sign that says "Fucker In Charge of you fucking fucks" (David Depo, vol. 2, Exhibit 24) Dated February 22, 2017				
149.	Alki David's Instagram post #Fuckmetoo (David Depo, vol. 2, Exhibit 27)				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
150.	Law360 article 10/11/19 - statement by Alki David				
151.	11/6/12 Complaint: <u>Monica D'Onofrio v. Alki David Productions, Inc., Filmon.com Inc., and Alkiviades David</u> , BC 495165				
152.	6/2/16 Complaint: <u>Mary Rizzo v. Alkiviades David; Anakando Media Holdings, Inc., Filmon Media Holdings Inc., Anakando Media Group USA</u>				
153.	2/2/17 Complaint: <u>Elizabeth Taylor and Chastity Jones v Alkiviades David et al</u> BC 649025				
154.	<u>Jones v. Alkiviades David et al. Amended Judgment on Special Verdict Upon Acceptance of Remittitur</u> 9/26/19				
155.	1/6/17 First Amended Complaint <u>Lauren Reeves v. Hologram USA, Inc., Alki David Productions, Inc., Alkiviades David</u> BC 643099				
156.	<u>Reeves v. Hologram USA, Inc. et al. Special Verdict (Phase I) 10/11/19 and Special Verdict (Phase II) 10/15/19</u>				
157.	11 second segment from "Lord of the Freaks; There's a Madness to his Method"				
158.	Trailer from "Lord of the Freaks"				
159.	Video of Alkiviades David - "Mangina"				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
160.	Video of Alkiviades David "apples/banana". Posted October 17, 2016				
161.	Photo titled "2 Girls, 1 cup - Cake"				
162.	10/18/19 Alki David Instagram story video				
163.	U.S. Securities and Exchange Commission, Form A-1 for Hologram USA Networks Inc. Filed on 3/13/18				
164.	Hologram USA Initial Public Offering 1/18				
165.	U.S. Securities and Exchange Commission, Form S-1 Registration Statement for Fotv Media Networks Inc., Filed 8/12/16				
166.	FilmOn TV Networks Code of Ethics and Business Conduct Filed With U.S. Securities and Exchange Commission 8/12/16				
167.	FilmOn TV Networks Code of Ethics for CEO and Senior Financial Officers Filed With U.S. Securities and Exchange Commission 8/12/16				
168.	U.S. Securities and Exchange Commission, Form 10-Q Quarterly Report for Period Ending 6/30/16				
169.	U.S. Securities and Exchange Commission, Form FWP FOTV Media Networks, Inc. Filing Under Securities Act Rule 163/433 of Free Writing Prospectuses. Submitted 9/20/16				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
170.	9/27/19 Complaint Case no. CV09013: <u>Securities and Exchange Commission Against Alkiviades David and Hologram USA Networks Inc.</u>				
171.	FilmOn Policies and Procedures FILMON0000054-56				
172.	FilmOn TV Sexual Harassment Policy FILMON0000040-41				
173.	FilmOn TV Sexual Harassment Policy FILMON0000063-64				
174.	FilmOn Policies and Procedures FILMON0000065-67				
175.	FilmOn Policies and Procedures FILMON0000068-70				
176.	FilmOn Company Policies and Procedures FILMON0000071-73				
177.	Password Construction Guidelines (updated Jan 2016) FILMON0000045-47				
178.	Password Construction Guidelines updated Jan. 2016 FILMON0000060-62				
179.	Password Construction Guidelines updated Jan. 2016 FILMON0000074-76				
180.	Email Policy updated Jan. 2016 FILMON0000051-53				
181.	Email Policy - updated Jan. 2016 FILMON0000057-59				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
182.	Employee List 08/29/14 ADP0000019-21				
183.	08/29/14 Employees ADP0000042-44				
184.	Alki David Productions Payroll Info 12/21/14 ADP 0000029				
185.	FilmOn and Alki David Productions 01/02/15 payroll info ADP0000025-29				
186.	Alki David Productions Salary Info 03/27/15 ADP0000037-38				
187.	FilmOn Employee Salary Info 03/27/15 ADP0000039				
188.	Alki David Productions and FilmOn TV 03/27/15 check date ADP0000040- 41				
189.	Payroll Info Blue Velvet Productions ADP0000022-24				
190.	Blue Velvet Productions/FilmOn TV ADP0000045-47				
191.	Hologram USA, Inc.'s Response to Plaintiff's Request for Production of Documents, (Set One) dated December 19, 2018				
192.	Hologram USA, Inc.'s Response to Plaintiff's Special Interrogatories, (Set One) dated December 19, 2018				
193.	Hologram USA, Inc.'s Response to Plaintiff's Form Interrogatories - General (Set One) dated December 19, 2018				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
194.	Hologram USA, Inc.'s Response to Plaintiff's Form Interrogatories - Employment Law (Set One) dated December 19, 2018				
195.	Alki David Productions, Inc.'s Response to Plaintiff's Request for Production of Documents, Set No. 1 dated December 19, 2018				
196.	Alki David Productions, Inc.'s Response to Plaintiff's Special Interrogatories, Set No. 1 dated December 19, 2018				
197.	Alki David Productions, Inc.'s Response to Plaintiff's Form Interrogatories - General, Set One dated December 19, 2018				
198.	Alki David Productions, Inc.'s Response to Plaintiff's Form Interrogatories - Employment Law, Set One dated December 19, 2018				
199.	Alkiviades David's Response to Plaintiff's Request for Production of Documents, Set No. 1 dated December 19, 2018				
200.	Alkiviades David's Response to Plaintiff's Special Interrogatories, Set No. 1 dated December 19, 2018				
201.	Alkiviades David's Response to Plaintiff's Form Interrogatories - General, Set One dated December 19, 2018				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
202.	Alkiviades David's Response to Plaintiff's Form Interrogatories - Employment Law, Set One dated December 19, 2018				
203.	FilmOn TV, Inc.'s Response to Plaintiff's Request for Production of Documents, Set No. 1 dated December 19, 2018				
204.	FilmOn TV, Inc.'s Response to Plaintiff's Special Interrogatories, Set No. 1 dated December 19, 2018				
205.	FilmOn TV, Inc.'s Response to Plaintiff's Form Interrogatories - General, Set No. 1 dated December 19, 2018				
206.	FilmOn TV, Inc.'s Response to Plaintiff's Form Interrogatories - Employment Law, Set No. 1 dated December 19, 2018				
207.	Hologram USA, Inc.'s Supplemental Responses to Plaintiff's Request for Production of Documents, Set No. 1 dated February 19, 2019				
208.	Hologram USA, Inc.'s Supplemental Responses to Plaintiff's Special Interrogatories, Set No. 1 dated February 19, 2019				
209.	Hologram USA, Inc.'s Supplemental Response to Plaintiff's Form Interrogatories - General, Set One dated February 25, 2019				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
210.	Hologram USA, Inc.'s Supplemental Response to Plaintiff's Form Interrogatories - Employment Law, Set One dated February 25, 2019				
211.	Alki David Productions, Inc.'s Supplemental Responses to Plaintiff's Request for Production of Documents, Set No. 1 dated February 19, 2019				
212.	Alki David Productions, Inc.'s Supplemental Responses to Plaintiff's Special Interrogatories, Set No. 1 dated February 19, 2019				
213.	Alki David Productions, Inc.'s Supplemental Response to Plaintiff's Form Interrogatories - General, Set One dated February 25, 2019				
214.	Alki David Productions, Inc.'s Supplemental Response to Plaintiff's Form Interrogatories, Employment Law, Set One dated February 25, 2019				
215.	Alkiviades David's Supplemental Responses to Plaintiff's Request for Production of Documents, Set No. 1 dated February 19, 2019				
216.	Alkiviades David's Supplemental Responses to Plaintiff's Special Interrogatories, Set No. 1 dated February 19, 2019				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
217.	Alkiviades David's Supplemental Response to Plaintiff's Form Interrogatories - General, Set One dated February 25, 2019				
218.	Alkiviades David's Supplemental Response to Plaintiff's Form Interrogatories - Employment Law, Set One dated February 25, 2019				
219.	FilmOn TV, Inc.'s Supplemental Responses to Plaintiff's Request for Production of Documents, Set No. 1 dated February 19, 2019				
220.	FilmOn TV, Inc.'s Supplemental Responses to Plaintiff's Special Interrogatories, Set No. 1 dated February 19, 2019				
221.	FilmOn TV, Inc.'s Supplemental Responses to Plaintiff's Form Interrogatories - General, Set One dated February 25, 2019				
222.	FilmOn TV, Inc.'s Supplemental Responses to Plaintiff's Form Interrogatories - Employment Law, Set One dated February 25, 2019				
223.	Alkiviades David's Response to Plaintiff's Request for Admissions, Set No. 1 dated April 12, 2019				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
224.	Hologram USA, Inc.'s Response to Plaintiff's Request for Production of Documents, Set No. 2 dated July 12, 2019				
225.	Alki David Productions, Inc.'s Response to Plaintiff's Request for Production of Documents, Set No. 2 dated July 12, 2019				
226.	Alkiviades David's Response to Plaintiff's Request for Production of Documents, Set No. 2 dated July 12, 2019				
227.	FilmOn TV, Inc.'s Response to Plaintiff's Request for Production of Documents, Set No. 2 dated July 12, 2019				
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DEFENDANT'S EXHIBIT LIST

Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
501.	Mahim Khan FilmOn.TV Employee File (FILMON0000003-20)				
502.	Mahim Khan Employee Deal Memo, dated September 29, 2014 (FILMON0000021-27)				
503.	Alki David Productions Inc. Team Member Handbook, approved 11/15/2012 (Alki David Productions 0000050-0000152)				
504.	2016 FilmOn Policies and Procedures (AD00245-AD000247)				
505.	FilmOn.TV, Inc. and Alki David Productions, Inc. Draft Policies and Procedures, undated (FILMON0000065-067)				
506.	FilmOn.TV Sexual Harassment Policy (FILMON0000063-064)				
507.	FilmOn Draft Email Policy (FILMON0000051-053)				
508.	FOTV Media Networks, Inc. Employee Handbook dated 11/22/2017 (AD00248- AD00306)				
509.	Plaintiff Mahim Khan's Objections And Responses To Defendant Hologram USA, INC.'s First Set Of Form Interrogatories - General, served June 28, 2017				

Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
510.	Lauren Reeves Instagram post: "Real quick, is my boner showing?" dated 05/28/2014 (AD00307)				
511.	Lauren Reeves Twitter post: "It gets drunk out early now" dated 11/06/2015 (AD00308)				
512.	Lauren Reeves Instagram post: "I put together a PowerPoint..." dated 1/16/2016 (AD00309)				
513.	Lauren Reeves Twitter post: "I picked this nectarine up..." dated 05/29/2016 (AD00310)				
514.	Lauren Reeves Twitter post: "Goodbye to a girl's best friend..." dated 06/28/2016 (AD00311-AD00321)				
515.	Lauren Reeves Twitter post: "My sweet dog..." dated 06/28/2016 (AD00322)				
516.	Lauren Reeves Twitter post: "How depressed are you..." dated 08/01/2016 (AD00323)				
517.	Lauren Reeves Twitter post: "Suicide is never the answer..." dated 08/03/2016 (AD00324)				
518.	Lauren Reeves Twitter post: "Just heard about a guy..." dated 8/29/2016 (AD00325)				
519.	Lauren Reeves Twitter post: "Me: '...then I overheard these girls..." dated 8/29/2016 (AD00326)				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
520.	Lauren Reeves Twitter post: "Grab our pussy" dated 10/07/2016 (AD00327)				
521.	Lauren Reeves Twitter post: "I've made some mistakes" dated 11/3/2016 (AD00328)				
522.	Lauren Reeves Twitter post: "Legal Contract: Thanksgiving" dated 11/14/2016 (AD00329-AD00331)				
523.	Lauren Reeves Twitter post: "Everybody be quiet!" dated 12/26/2016 (AD00332)				
524.	Lauren Reeves Twitter post: "Hey 2016, you also killed my dog..." dated 12/30/2016 (AD00333)				
525.	Lauren Reeves Twitter post: "Wow, Donald Trump has completely ruined..." dated 01/10/2017 (AD00334)				
526.	Lauren Reeves Twitter post: "Watching Tombstone on my flight..." dated 02/26/2017 (AD00335)				
527.	Lauren Reeves Twitter post: "To be fair, who HASN'T lied under oath..." dated 03/01/2017 (AD00336)				
528.	Lauren Reeves Twitter post: "One time I went without health insurance..." dated 03/07/2017 (AD00337)				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
529.	Lauren Reeves Twitter post: "Have you or a loved one suffered unfair prejudice..." dated 04/11/2017 (AD00338)				
530.	Lauren Reeves Twitter post: @realDonaldTrump - I can't help but notice...dated 05/08/2017 (AD00339)				
531.	Lauren Reeves Twitter post: "Thank you Donald Trump for inspiring..." dated 05/22/2017 (AD00340)				
532.	Lauren Reeves Twitter post: "Beautiful sunset tonight" dated 07/09/2017 (AD00341)				
533.	Lauren Reeves Twitter post: "I don't want to picture Steve Bannon..." dated 07/27/2017 (AD00342)				
534.	Lauren Reeves Twitter post: "Second night in a row my dog..." dated 08/23/2017 (AD00343)				
535.	Lauren Reeves Twitter post: "I'm not a big birthday person..." dated 09/04/2017 (AD00344)				
536.	Lauren Reeves Twitter post: "I'm not writing a #MeToo post..." dated 10/17/2017 (AD00345)				
537.	Lauren Reeves Instagram post: "Desk sign dated 10/15/2018 (AD00346)				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
538.	Screen Shot Of Text Message With Chasity Jones (1:22 p.m.) (AD00001)				
539.	Screen Shot Of Text Message With Chasity Jones (5:51 p.m.) (AD00002)				
540.	Screen Shot Of Text Message With Chasity Jones (5:30 p.m.) (AD00003)				
541.	Screen Shot Of Text Message With Chasity Re: Going Home (AD00004)				
542.	Declaration of Chastity Jones (AD00005-AD00006)				
543.	Screen Shot of Text Message to Mary Rizzo (AD00007-AD00014)				
544.	Screen Shot of Text Message to Mary Rizzo (AD00011-AD00012)				
545.	Text Messages from Mary Rizzo to Chasity Jones (AD00013-AD00020)				
546.	Screen Shot of March 17, 2015 Instagram Post by chasityjones (AD00021)				
547.	Screen Shot of March 10, 2015 Instagram Post by chasityjones (AD00022)				
548.	Handwritten Message from Chasity Jones to Alki David (AD00023)				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
549.	Screen Shot Of Text Messages To "Carl Manager" (AD00024)				
550.	Screen Shot of Text Messages to "MK" (AD00032-AD00047)				
551.	Screen Shot Of January 21, 2015 Instagram Post by eliztaylor (AD00048)				
552.	February 3, 2016 Letter from Department of Fair Employment and Housing Re: DFEH Matter Number 739969-207321 with enclosures (AD00049-AD00056)				
553.	Screen Shot Of Text Messages between Mary Rizzo and Elizabeth Taylor (3:19 p.m.) (AD00057-AD00059)				
554.	Screen Shot Of Text Messages between Mary Rizzo and Chasity Jones (12:41 a.m.) (AD00060-AD00061)				
555.	Screen Shot Of Text Messages between Mary Rizzo and Chasity Jones (12:39 a.m.) (AD00062)				
556.	Screen Shot Of Text Messages between Mary Rizzo and Chasity Jones (8:27 a.m.) (AD00063)				
557.	Screen Shot Of Text Messages between Mary Rizzo and Chasity Jones (5:00 p.m.) (AD00064)				
558.	Screen Shot Of Text Messages between Mary Rizzo and Chasity Jones (8:49 p.m.) (AD00065)				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
559.	Screen Shot Of Text Messages between Mary Rizzo and Chastity Jones (9:49 a.m.) (AD00066-AD00067)				
560.	Screen Shot Of Text Messages between Mary Rizzo and Chasity Jones at chastityjones@yahoo.com (AD00068)				
561.	Screen Shot Of December 30, 2016 Instagram Post by chastityjones (AD00069)				
562.	Screen Shot Of February 16, 2018 Instagram Post by chastityjones (AD00070)				
563.	Screen Shot Of January 2, 2018 Instagram Post by chastityjones (AD00071)				
564.	Screen Shot Of April 1, 2018 Instagram Post by chastityjones (AD00072)				
565.	Screen Shot Of August 20, 2018 Instagram Post by chastityjones (AD00073)				
566.	January 31, 2017 Letter from Department of Fair Employment and Housing Re: DFEH Matter Number 852881-272913 with enclosures (AD00074-AD00081)				
567.	Screen Shot Of August 9, 2016 Instagram Post by eliztaylor (AD00082)				
568.	Screen Shot Of August 24, 2016 Instagram Post by eliztaylor (AD00083)				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
569.	Screen Shot Of August 28, 2016 Instagram Post by eliztaylor (AD00084)				
570.	Screen Shot Of September 2, 2016 Instagram Post by eliztaylor (AD00085)				
571.	Screen Shot Of April 10, 2017 Instagram Post by eliztaylor (AD00086)				
572.	Screen Shot Of August 4, 2017 Instagram Post by eliztaylor (AD00087)				
573.	Screen Shot of August 24, 2017 (AD00088)				
574.	Screen Shot Of August 25, 2017 Instagram Post by eliztaylor (AD00089)				
575.	Screen Shot Of August 31, 2017 Instagram Post by eliztaylor (AD00090)				
576.	Screen Shot Of September 5, 2017 Instagram Post by eliztaylor (AD00091)				
577.	Screen Shot Of September 30, 2017 Instagram Post by eliztaylor (AD00092)				
578.	Screen Shot Of October 25, 2017 Instagram Post by eliztaylor (AD00093)				
579.	Screen Shot Of December 27, 2017 Instagram Post by eliztaylor (AD00094)				
580.	Screen Shot Of January 6, 2018 Instagram Post by eliztaylor (AD00095)				
581.	Screen Shot Of April 9, 2018 Instagram Post by eliztaylor (AD00096)				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
582.	Screen Shot Of May 8, 2018 Instagram Post by eliztaylor (AD00097)				
583.	Screen Shot Of July 13, 2018 Instagram Post by eliztaylor (AD00098)				
584.	Screen Shot Of October 26, 2018 Instagram Post by eliztaylor (AD00099)				
585.	Screen Shot Of December 4, 2018 Instagram Post by eliztaylor (AD00100)				
586.	Screen Shot Of December 9, 2018 Instagram Post by eliztaylor (AD00101)				
587.	Screen Shot Of December 9, 2018 Instagram Post by eliztaylor (AD00102)				
588.	Screen Shot Of December 17, 2018 Instagram Post by eliztaylor (AD00103)				
589.	Screen Shot Of January 13, 2019 Instagram Post by eliztaylor (AD00104)				
590.	Screen Shot Of January 17, 2019 Instagram Post by eliztaylor (AD00105)				
591.	Screen Shot Of April 20, 2019 Instagram Post by eliztaylor (AD00106)				
592.	Video Entitled "LORD of the FREAKS Official Red Band Trailer" Link: https://youtu.be/iz3kaMuyyk8 (AD00107)				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
593.	February 1, 2017 Letter from Dept. of Fair Employment and Housing Re: DFEH Matter Number 852606-272658 (AD00108-AD00115)				
594.	Screen Shot Of December 24, 2018 Instagram Post by chasityjones (AD00116)				
595.	Screen Shot Of April 8th Instagram Post by chasityjones (AD00117)				
596.	Screen Shot Of February 17th Instagram Post by chasityjones (AD00118)				
597.	Screen Shot Of February 13th Instagram Post by chasityjones (AD00119)				
598.	Screen Shot Of February 2nd Instagram Post by chasityjones (AD00120)				
599.	Screen Shot Of January 1st Instagram Post by chasityjones (AD00121)				
600.	Screen Shot Of December 16, 2018 Instagram Post by chasityjones (AD00122)				
601.	Screen Shot Of December 7, 2018 Instagram Post by chasityjones (AD00123)				
602.	Screen Shot Of November 17, 2018 Instagram Post by chasityjones (AD00124)				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
603.	Screen Shot Of November 5, 2018 Instagram Post by chasityjones (AD00125)				
604.	Screen Shot Of October 31, 2018 Instagram Post by chasityjones (AD00126)				
605.	Screen Shot Of October 19, 2018 (AD00127)				
606.	Screen Shot Of October 13, 2018 Instagram Post by chasityjones (AD00128)				
607.	Screen Shot Of October 1, 2018 Instagram Post by chasityjones (AD00129)				
608.	Screen Shot Of September 9, 2018 Instagram Post by chasityjones (AD00130)				
609.	Screen Shot Of August 25, 2018 Instagram Post by chasityjones (AD00131)				
610.	Screen Shot Of July 24, 2018 Instagram Post by chasityjones (AD00132)				
611.	Screen Shot Of July 22, 2018 Instagram Post by chasityjones (AD00133)				
612.	Screen Shot Of April 20, 2018 Instagram Post by chasityjones (AD00134)				
613.	Screen Shot Of February 17, 2018 Instagram Post by chasityjones (AD00135)				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
614.	Screen Shot Of January 11, 2018 Instagram Post by chasityjones (AD00136)				
615.	Screen Shot Of January 11, 2018 Instagram Post by chasityjones (AD00137)				
616.	Screen Shot Of January 11, 2018 Instagram Post by chasityjones (AD00138)				
617.	Screen Shot Of November 8, 2016 Instagram Post by chasityjones (AD00139)				
618.	Screen Shot Of October 28, 2016 Instagram Post by chasityjones (AD00140)				
619.	Diagram of Hologram Presentation (AD00141)				
620.	Foxwood / Hologram agreement by Chasity Jones (dated March 23, 2016) (AD00142-AD00150)				
621.	Elizabeth Taylor employee file for FilmOn.TV (AD00151-AD00175)				
622.	Chasity Jones employee file for FilmOn.TV (AD00176-AD00200)				
623.	Elizabeth Taylor email to Yelena Calendar (dated June 1, 2015) (AD00201-AD00206)				
624.	Screen Shot Of Text Messages between Elizabeth Taylor and Carl Dawson (AD00207-AD00214)				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
625.	Screen Shot Of Text Messages between Elizabeth Taylor and Mahim Khan (MK) (AD00215-AD00230)				
626.	Screen Shot Of Text Messages between Chastity Jones and Mary Rizzo (AD00231-AD00244)				
627.	Screen Shot of March 14, 2019 Instagram Post by eliztaylor; link: https://www.Instagram.com/p/BvA9DKbF2Ja/?utm_source=ig_web_copy_link " (AD00347)				
628.	Screen Shot of May 5, 2019 Instagram Post by chasityjones; Link: https://www.Instagram.com/p/BxFtrFonpXo/?utm_source=ig_web_copy_link (AD00348)				
629.	Instagram video posted on May 7, 2019 by chasityjones; Link: https://www.Instagram.com/p/BxK-qr1lxoP/?utm_source=ig_web_copy_link (AD00349)				
630.	Screen Shot of May 16, 2019 Instagram Post by chasityjones; Link: https://www.Instagram.com/p/Bxi4sAQAcyB/?utm_source=ig_web_copy_link (AD00350)				
631.	Screen Shot of July 16, 2019 Instagram Post by chasityjones; Link: https://www.Instagram.com/p/Bz_MXFzlg2X/?utm_source=ig_web_copy_link (AD00351)				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
632.	Instagram video posted on July 31, 2019 by chasityjones; Link: https://www.Instagram.com/p/B0mgTk8A4FG/?utm_source=ig_web_copy_link (AD00352)				
633.	Screen Shot of August 5, 2019 Instagram Post by chasityjones; Link: https://www.Instagram.com/p/B0yf2_WA1-v/?utm_source=ig_web_copy_link (AD00353)				
634.	Screen Shot of August 7, 2019 Instagram Post by chasityjones; Link: https://www.Instagram.com/p/B03tDA4ACsS/?utm_source=ig_web_copy_link (AD00354)				
635.	Screen Shot of August 13, 2019 Instagram Post by chasityjones; Link: https://www.Instagram.com/p/B1HY634A62H/?utm_source=ig_web_copy_link (AD00355)				
636.	Screen Shot of September 3, 2019 Instagram Post by chasityjones; Link: https://www.Instagram.com/p/B19NQjpA35Y/?utm_source=ig_web_copy_link (AD00356)				
637.	Screen Shot of September 6, 2019 Instagram Post by chasityjones; Link: https://www.Instagram.com/p/B2EfbdiAD_/?utm_source=ig_web_copy_link (AD00357)				

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Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
638.	Instagram video posted on September 11, 2019 by chasityjones; Link: https://www.Instagram.com/p/B2Rs0_IAUTw/?utm_source=ig_web_copy_link (AD00358)				
639.	Screen Shot of September 21, 2019 Instagram Post by chasityjones (AD00359)				
640.	Instagram video posted on October 1, 2019 by chasityjones; Link: https://www.Instagram.com/p/B3Fa0cPgaS9/?utm_source=ig_web_copy_link (AD00360)				
641.	Video of Alki David playfully attacking FilmOn TV crew (AD00361)				
642.	Screenshot of photograph of Mahim Khan (AD00362)				
643.	Screenshot of Mahim Khan iMessages, dated 7/26/2015 to 11/9/2015. (AD00363)				
644.	Screenshot of Mahim Khan iMessages, dated 7/9/2015 to 7/26/2015 (AD00366)				
645.	Screenshot of Mahim Khan iMessages, dated 7/26/2015 to 10/6/2015 (AD00367)				
646.	May 2, 2016 email from Tracy L. Fehr to Mahim Khan re: five declarations (AD00365)				

Exh No.	Description	Stipulate to Authenticity	Stipulation to Admit	Date Identified	Date Admitted
650.	Screenshot of Mahim Khan Photograph (AD00370)				

DATED: October 25, 2019

ALLRED, MAROKO & GOLDBERG

By: 

NATHAN GOLDBERG
DOLORES Y. LEAL
RENEE MOCHKATEL
Attorneys for Plaintiff,
MAHIM KHAN

DATED: October __, 2019

VENABLE LLP

By: 

ELLYN S. GAROFALO
AMIR KALITGRAD
Attorneys for Defendants
HOLOGRAM USA, INC., et al.

1 **PROOF OF SERVICE**

2
3 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

4 I am employed in the County of Los Angeles, State of California. I am over the age of 18
5 and not a party to the within action; my business address is: 6300 Wilshire Boulevard, Suite 1500,
Los Angeles, California 90048.

6 On **October 25, 2019** I served the foregoing document described as **JOINT EXHIBIT**
7 **LIST** on interested parties in this action

8 by placing the original a true copy thereof enclosed in sealed envelopes at Los
Angeles, California addressed as follows:

9 Ellyn S. Garofalo, Esq.
10 Amir Kaltgrad, Esq.
11 **VENABLE LLP**
12 2049 Century Park East, Suite 2300
Los Angeles, CA 90067
esgarofalo@venable.com
akaltgrad@venable.com

13 **BY MAIL:** I caused such envelope with postage thereon fully prepaid to be placed in the
14 United States mail at Los Angeles, California.

15 **BY E-MAIL:** I caused such document to be electronically served via email to the email
address of the addressee(s).

16 **BY PERSONAL SERVICE:** I caused such envelope to be personally served on the
17 Addressee(s) to the offices of the addressee(s).

18 Executed on **October 25, 2019** at Los Angeles, California.

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

20 **Federal** I declare that I am employed in the office of a member of the bar of this Court at
21 whose direction the service was made.

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23
24 
ANGIE O. PAZ
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VENABLE LLP
2049 CENTURY PARK EAST, SUITE 2300
LOS ANGELES, CA 90067
310-229-9900

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PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

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 Venable LLP, 2049 Century Park East, Suite 2300, Los Angeles, California.

On the below date, I served or caused to be served a copy of the foregoing document(s) described as **DEFENDANTS HOLOGRAM USA, INC., ALKI DAVID PRODUCTIONS, INC. AND FILMON TV, INC.’S RESPONSE TO MAHIM KHAN’S NOTICE OF EVIDENCE SUBJECT TO COURT’S GRANT OF PLAINTIFF’S MOTION IN LIMINE TO EXCLUDE THIRD PARTY WITNESSES AND DOCUMENTS NOT DISCLOSED OR PRODUCED IN DISCOVERY**, on the interested parties in this action addressed as follows:

Gloria R. Allred, Esq.
Dolores Y. Leal, Esq.
Renee Mochkatel, Esq.
Law Offices of Allred, Maroko & Goldberg
6300 Wilshire Boulevard, Suite 1500
Los Angeles, CA 90048

T: (323) 653-6530
F: (323) 653-1660

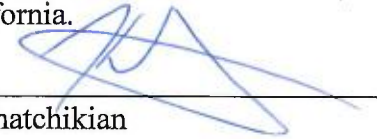
Attorneys for Plaintiff Mahim Khan

By placing true copies thereof enclosed in a sealed envelope(s) addressed as stated above.

- BY MAIL (CCP §1013(a)&(b)):** I am readily familiar with the firm’s practice of collection and processing correspondence for mailing with the U.S. Postal Service. Under that practice such envelope(s) is deposited with the U.S. postal service on the same day this declaration was executed, with postage thereon fully prepaid at 2049 Century Park East, Suite 2300, Los Angeles, California, in the ordinary course of business.
- BY ELECTRONIC SERVICE (CCP § 1010.6; CRC Rule 2.251(g)):** I transmitted the above-stated document(s) and a copy of this declaration from my computer (electronic notification address VRKhatchikian@Venable.com) located Venable LLP, 2049 Century Park East, Suite 2300, Los Angeles, CA 90067 to the interested parties in this action whose names and e-mail addresses are listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. Service by e-mail or electronic transmission was agreed upon based on a court order or an agreement of the parties to accept service.

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

Executed on October 30, 2019, at Los Angeles, California.



Rose Khatchikian