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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF LOS ANGELES – TORRANCE COURTHOUSE**

13 This Matter Relates to:) Case No.: 22TRCV01604
14 JULIA MISLEY, formerly known as JULIA) Hon. Gary Y. Tanaka
HOLCOMB, an individual,) Dept. B
15 Plaintiff,) **FIRST AMENDED COMPLAINT FOR**
16 vs.) **DAMAGES FOR:**
17 STEVEN VICTOR TALLARICO A/K/A STEVEN) **(1) SEXUAL BATTERY (CIVIL CODE**
TYLER, an individual; and DOES 2 through DOE) **§1708.5);**
18 50, inclusive,) **(2) SEXUAL ASSAULT;**
19 Defendant) **(3) INTENTIONAL INFLICTION OF**
20) **EMOTIONAL DISTRESS**
) **DEMAND FOR JURY TRIAL**

21 Plaintiff JULIA (HOLCOMB) MISLEY brings this action against Defendants STEVEN
22 VICTOR TALLARICO A/K/A STEVEN TYLER, and DOES 2 through 50, inclusive
23 (collectively, “Defendants”), and based on information and belief alleges as follows:

24 **INTRODUCTION**

25 1. Plaintiff is a survivor of childhood sexual abuse, sexual battery, assault, and
26 molestation at the hands of STEVEN VICTOR TALLARICO A/K/A STEVEN TYLER
27 (hereinafter, “Defendant Tyler”). When Plaintiff was 16 years old, DEFENDANT TYLER used
28 his role, status, and power as a well-known musician and rock star to gain access to, groom,

1 manipulate, exploit, sexually assault Plaintiff over the course of over three years in numerous
2 states across the country, including in the State of California, County of Los Angeles. As a result
3 of DEFENDANT TYLER'S sexual abuse and assault, Plaintiff has suffered severe emotional,
4 physical and psychological injury, including humiliation, shame, and guilt, economic loss,
5 economic capacity, earning loss and permanent emotional distress.

6 **JURISDICTION AND VENUE**

7 2. This Court has jurisdiction over the subject matter of this action pursuant to Article
8 VI, section 10 of the California Constitution and section 410.10 of the California Code of Civil
9 Procedure.

10 3. Venue is proper in this Court under Code of Civil Procedure section 395 because a
11 substantial part of the conduct alleged giving rise to the violations of law alleged herein occurred
12 in Los Angeles County.

13 **PARTIES**

14 4. Plaintiff is an adult female residing in the State of Texas. Plaintiff was sexually
15 abused as a minor. Plaintiff brings this Complaint pursuant to California Code of Civil Procedure
16 Section 340.1, as amended by Assembly Bill 218, for the child sexual assault she suffered at the
17 hands of Defendant. Thus, Plaintiff's claims for damages suffered as a result of childhood sexual
18 assault are timely filed as they are filed within three years of January 1, 2020. Plaintiff is over the
19 age of forty (40) years old. Therefore, the Plaintiff has filed a declaration from a mental
20 healthcare practitioner, and an attorney declaration for each named defendant in this action,
21 pursuant to the requirements of Code of Civil Procedure §340.1.

22 5. The childhood sexual abuse, harassment and/or assault of Plaintiff occurred in
23 numerous states around the country including California and Los Angeles County.

24 6. DEFENDANT TYLER, the alleged perpetrator, at all times mentioned herein was
25 and is an adult male individual. By 1973, DEFENDANT TYLER was a renowned and well-
26 known musician and leading member of a world-famous rock band. By 1973 DEFENDANT
27 TYLER had acquired wealth, stature, and power as a result of his career and status as a rock star.
28 This status afforded DEFENDANT TYLER particular power and influence over minors including

1 Plaintiff.

2 7. On information and belief Plaintiff alleges that the true names and capacities,
3 whether individual, corporate, associate or otherwise, of Defendants named herein as DOES 2
4 through 50, inclusive, are unknown to the Plaintiff, who therefore sues said Defendants by such
5 fictitious names. Plaintiff will amend the Complaint to allege their true names and capacities
6 when such have been ascertained. Upon information and belief, each of the said Doe Defendants
7 is responsible in some manner under *Code of Civil Procedure* §§340.1(a)(1), (2), (3), and
8 340.1(c) for the occurrences herein alleged, and were a legal cause of the childhood sexual assault
9 and intentional infliction of emotional distress which resulted in injury to the Plaintiff as alleged
10 herein.

11 8. At all times mentioned herein, there existed a unity of interest and ownership
12 among Defendants and each of them, such that any individuality and separateness between
13 Defendants, and each of them, ceased to exist. Defendants and each of them, were the
14 successors-in-interest and/or alter egos of the other Defendants, and each of them, in that they
15 purchased, controlled, dominated and operated each other without any separate identity,
16 observation of formalities, or other manner of division. To continue maintaining the facade of a
17 separate and individual existence between and among Defendants, and each of them, would allow
18 Defendants to perpetrate a fraud and an injustice.

19 9. At all times mentioned herein, Defendants and each of them were the agents,
20 representatives and/or employees of each and every other Defendant. In doing the things
21 hereinafter alleged, Defendants and each of them, were acting within the course and scope of said
22 alternative personality, capacity, identity, agency, representation and/or employment and were
23 within the scope of their authority, whether actual or apparent. Plaintiff is informed and believes,
24 and on that basis alleges, that at all times mentioned herein, Defendants and each of them were
25 the managers, trustees, partners, servants, joint venturers, shareholders, contractors, and/or
26 employees of each and every other Defendant, and the acts and omissions herein alleged were
27 done by them, acting individually, through such capacity and within the scope of their authority,
28 and with the permission and consent of each and every other Defendant and that said conduct was

1 thereafter ratified by each and every other Defendant, and that each of them is jointly and
2 severally liable to Plaintiff.

3 **GENERAL FACTUAL ALLEGATIONS**

4 ***I. Minor Plaintiff Meets and is Assaulted by DEFENDANT TYLER***

5 10. On information and belief, in 1973, Plaintiff came to know an individual who was
6 well known in the music community as associating with girls and young women who would
7 become accessible and susceptible to famous musicians. In 1973, DEFENDANT TYLER
8 performed a concert in Portland, Oregon, and Plaintiff was invited backstage by agents of
9 defendant. This was the first time Plaintiff met DEFENDANT TYLER. Upon information and
10 belief, Plaintiff had turned 16 one month earlier. Upon information and belief, DEFENDANT
11 TYLER was 25 years old.

12 11. Upon information and belief, DEFENDANT TYLER showed unusual interest in
13 Plaintiff immediately and, after speaking with her backstage DEFENDANT TYLER took
14 Plaintiff and another individual to his hotel room. Upon information and belief, DEFENDANT
15 TYLER then required the other individual to leave so that he was alone with Plaintiff. Among
16 other topics, Plaintiff and DEFENDANT TYLER discussed Plaintiff's age and Plaintiff informed
17 him of her age. Defendant Tyler inquired where Plaintiff's parents were and why she was out all
18 night by herself. Plaintiff informed DEFENDANT TYLER of struggles she was facing at home.
19 DEFENDANT TYLER performed various acts of criminal sexual conduct upon Plaintiff that
20 night. DEFENDANT TYLER had Plaintiff stay with him in his hotel that night and then sent her
21 home the next morning in a taxicab. Before she left, DEFENDANT TYLER invited Plaintiff to
22 Seattle for his band's next concert. Upon information and belief, He said he would buy the plane
23 ticket so that she could travel separately from him since she was a minor and could not travel with
24 DEFENDANT TYLER across state lines. Plaintiff used the plane ticket provided by
25 DEFENDANT TYLER to fly to Seattle for his concert. DEFENDANT TYLER had Plaintiff stay
26 in his hotel room after the show that night and again DEFENDANT TYLER performed various
27 sexual acts upon Plaintiff. Plaintiff flew back to Portland the next day with the ticket provided by
28

1 Defendant.

2 12. Upon information and belief, after the show in Seattle, DEFENDANT TYLER
3 continued to pursue Plaintiff by frequently telephoning her at her home, making various
4 statements to induce her to visit him again including, but not limited to, telling her that he wrote a
5 song for her that he recorded with his band, and that he wished she could be in the recording
6 studio with him so he could sing it to her.

7 13. Upon information and belief, once Plaintiff finished her sophomore school year,
8 DEFENDANT TYLER caused her to travel to Boston to stay with him. Upon information and
9 belief, within a weeks, DEFENDANT TYLER told Plaintiff that he didn't want her to return to
10 Portland for school, that he wanted her to stay with him and that he wanted to continue taking her
11 on the road with him and his band promising to provide for her as she traveled with him. During
12 this time, he continued to sexually assault Plaintiff. Plaintiff, a minor, was powerless to resist
13 DEFENDANT TYLER's power, fame and substantial financial ability. DEFENDANT TYLER
14 coerced and persuaded Plaintiff into believing this was a "romantic love affair".

15 ***II. DEFENDANT TYLER Becomes Plaintiff's Guardian and the Assaults Continue***

16 14. Upon information and belief, in approximately 1974, DEFENDANT TYLER and
17 his agents took actions for DEFENDANT TYLER to become the guardian for Plaintiff so that he
18 could more easily travel with Plaintiff and avoid criminal prosecution. Upon information and
19 belief, DEFENDANT TYLER met with Plaintiff's mother and convinced her to sign over the
20 guardianship of her daughter to him. Upon information and belief, DEFENDANT TYLER made
21 various promises and inducements to Plaintiff's mother assuring her of the wellbeing of Plaintiff
22 including, but not limited to promising he would enroll her in school; that he would support her;
23 and provide her with better medical care and support than her mother could at the time.
24 DEFENDANT TYLER did not meaningfully follow through on these promises and instead
25 continued to travel with, assault and provide alcohol and drugs to Plaintiff.

26 ***III. DEFENDANT TYLER Impregnates Plaintiff and Coerces an Abortion***

27 15. Upon information and belief, in approximately 1975, Plaintiff became pregnant as
28 a result of the sexual acts by DEFENDANT TYLER causing him to be simultaneously both the

1 father of Plaintiff's unborn child and her legal guardian. Upon information and belief
2 DEFENDANT TYLER was the sole source of income, transportation and support for Plaintiff.
3 Upon information and belief, DEFENDANT TYLER when informed of the pregnancy instructed
4 Plaintiff that she could not seek prenatal medical care because "he would get in trouble" for
5 fathering the child when inquiries of paternity arose with the medical providers. Plaintiff
6 continued to follow the instructions and commands of DEFENDANT TYLER who continued to
7 woo and exert undue influence over Plaintiff by, among other actions, informing Plaintiff that he
8 wrote, and his band recorded another song referring to and inspired by her.

9 16. Upon information and belief, in approximately fall of 1975 when Plaintiff was
10 pregnant, DEFENDANT TYLER while touring with his band left Plaintiff home alone in
11 DEFENDANT TYLER's Massachusetts apartment with little food, money and without a car.
12 Upon information and belief, a fire occurred in the apartment and Plaintiff lost consciousness
13 from smoke inhalation. Plaintiff regained consciousness in a Catholic hospital with
14 DEFENDANT TYLER at her bedside. Medical staff informed them that Plaintiff would make a
15 full recovery and the baby was unharmed.

16 17. Upon information and belief thereafter, DEFENDANT TYLER pressured and
17 coerced Plaintiff to have an abortion by threatening that he would send her back to her family and
18 cease to support and love her. Agents of DEFENDANT TYLER were present and assisted with
19 arrangement for the abortion which needed to be performed at a different facility since the facility
20 treated Plaintiff was Catholic and an abortion was not available. Plaintiff relented and the
21 abortion was performed.

22 ***IV. DEFENDANT Causes Additional Harm to Plaintiff by His Publications for Profit***

23 18. Plaintiff made a conscious decision to leave and escape the music and drug addled
24 world seeking to be free from the sexualized culture created by DEFENDANT TYLER and the
25 industry. Plaintiff returned to Portland and over the years rebuilt her life, obtained a GED,
26 attended college, and became active in her Christian faith. She met her husband, became married
27 and started a family, repairing her soul through faith and family. Plaintiff became deeply devoted
28 to the Catholic faith which celebrated the sanctity of life as she sought comfort, counseling and

1 solace with her priest. As a result of the abuse, Plaintiff kept her private shame in silence and
2 secrecy.

3 19. That life was shattered when DEFENDANT TYLER made widespread
4 publications and statements for profit. The callous behavior by DEFENDANT TYLER included
5 publishing of his memoirs and/or books describing his abuse of Plaintiff without her knowledge
6 or consent. Those memoirs characterize the child sex assaults of Plaintiff as a romantic, loving
7 relationship without her knowledge or consent. DEFENDANT TYLER made these statements
8 with the intent of garnering various benefits including fame and financial benefit for himself and
9 his managers/agents/publishers without the consent or permission of Plaintiff and to her
10 detriment. As a result of DEFENDANT TYLER's statements and writings, DEFENDANT
11 TYLER imposed involuntary infamy upon Plaintiff. She suffered and continues to suffer deep
12 emotional harm as a result. The involuntary infamy and public dissemination of Plaintiff's
13 assaults has aggravated and exacerbated the harm caused by the assaults and continues to prevent
14 healing of the trauma and creates additional trauma.

15 20. Upon information and belief, DEFENDANT TYLER's memoirs and statements
16 confirm and confess the crimes he perpetrated upon Plaintiff including:

17 "She was 16, she knew how to nasty ... with my bad self being twenty-six and she barely
18 old enough to drive and sexy as hell, I just fell madly in love with her... She was my
19 heart's desire, my partner in crimes of passion... I was so in love I almost took a teen
20 bride. I went and slept at her parent's house for a couple of nights and her parent's fell in
21 love with me, signed paper over for me to have custody, so I wouldn't get arrested if I
22 took her out of state. I took her on tour with me."

23 21. By including Plaintiff's name in the acknowledgements, he left the readers and the
24 public without any doubt of Plaintiff's identity. Soon after, Plaintiff was in line at a grocery store
25 and saw a picture of herself on a tabloid that referred to her as DEFENDANT TYLER's teen
26 lover. The caption under Plaintiff's photo read, "She was 15 when they fell in love. He's
27 described her as having 'more legs than a bucket of chicken.' ... attempts to contact Julia have
28 been unsuccessful."

1 22. The article went on to describe certain details including the fire that nearly killed
2 her and the coerced abortion, these were now published along with her status as a victim of sexual
3 assault subjecting her to involuntary infamy.

4 23. DEFENDANT TYLER's ongoing pattern of conduct including, but not limited his
5 lurid references about her, his public statements, publications, the widespread public interest of
6 DEFENDANT TYLER's actions violated Plaintiff's privacy, requiring her to make apologies and
7 disclosures to her husband, children, family, and friends, that she never would have absent his
8 malicious publication of her details in his books. Plaintiff has suffered specific and additional
9 trauma and damages because of the public statements made by DEFENDANT TYLER.

10 24. DEFENDANT TYLER knew or should have known that his publication of
11 Plaintiff's private details has subjected Plaintiff to public ridicule, harassment, trauma and
12 aggravation and continuation of the harm caused by the sexual assaults.

13 25. As a direct and proximate result of the childhood sexual assault, harassment and
14 abuse committed against the Plaintiff by DEFENDANT TYLER, Plaintiff has suffered personal
15 physical injury of sexual assault, and has and will continue to suffer, psychological, mental and
16 emotional distress, including but not limited to depression, anxiety, anger/agitation, loss of
17 appetite, trouble concentrating, feeling degraded, loss of enjoyment of life, guilt, shame,
18 humiliation, embarrassment, fear, fatigue, helplessness, loneliness, nightmares, PTSD,
19 impairment of relationships, loss of self-esteem, sleeplessness, stomach problems, stress,
20 difficulty with trust, and all associated economic injury.

21 26. These damages were all suffered as general, special and consequential damages of
22 Plaintiff, in an amount to be proven at trial, but in no event less than the minimum jurisdictional
23 amount of this Court.

24 **FIRST CAUSE OF ACTION**
25 **SEXUAL BATTERY (CIVIL CODE §1708.5)**
26 **(Against all DEFENDANTS)**

27 27. Plaintiff re-alleges and incorporates by reference herein each and every allegation
28 contained herein above as though fully set forth and brought in this cause of action.

1 28. Between approximately 1973 and 1975, DEFENDANT TYLER, intentionally,
2 recklessly and wantonly did acts which were intended to, and did result in harmful and offensive
3 contact with intimate parts of Plaintiff’s person. Plaintiff was subjected to multiple instances of
4 sexual assault by DEFENDANT TYLER, during Plaintiff’s time as a minor.

5 29. DEFENDANT TYLER did the aforementioned acts with the intent to cause a
6 harmful or offensive contact with an intimate part of Plaintiff’s person and would offend a
7 reasonable sense of personal dignity. Further, said acts did cause a harmful or offensive contact
8 with an intimate part of Plaintiff’s person that would offend a reasonable sense of personal
9 dignity.

10 30. The aforementioned acts constituted criminal sexual conduct pursuant to the
11 California Penal Code.

12 31. Because of DEFENDANT TYLER’s position of authority over Plaintiff, and
13 Plaintiff’s mental and emotional state, and Plaintiff’s young age, Plaintiff was unable to, and did
14 not, give meaningful consent to such acts.

15 32. As a direct, legal, and proximate result of the acts of DEFENDANT TYLER,
16 Plaintiff sustained serious and permanent injuries to her person, all of which are damages in an
17 amount to be shown according to proof and within the jurisdiction of the Court.

18 33. In subjecting the Plaintiff to the wrongful treatment herein described,
19 DEFENDANT TYLER, acted willfully and maliciously with the intent to harm Plaintiff, and in
20 conscious disregard of Plaintiff’s rights, to constitute malice and oppression under California
21 *Civil Code* §3294. Plaintiff is therefore entitled to the recovery of punitive damages, in an amount
22 to be determined by the court, against DEFENDANT TYLER, in a sum to be shown according to
23 proof.

24 **SECOND CAUSE OF ACTION**
 SEXUAL ASSAULT
25 **(Against all DEFENDANTS)**

26 34. Plaintiff re-alleges and incorporates by reference herein each and every allegation
27 contained herein as though fully set forth and brought in this cause of action.

28 35. DEFENDANT TYLER, in doing the things herein alleged, including intending to

1 subject Plaintiff to numerous instances of sexual abuse and molestation, intended to cause
2 harmful or offensive contact with Plaintiff's person, or intended to put Plaintiff in imminent
3 apprehension of such contact.

4 36. In doing the things herein alleged, Plaintiff was put in imminent apprehension of a
5 harmful or offensive contact by DEFENDANT TYLER, and actually believed DEFENDANT
6 TYLER had the ability to make harmful or offensive contact with Plaintiff's person.

7 37. Plaintiff did not consent to DEFENDANT TYLER's intended harmful or offensive
8 contact with Plaintiff's person, or intent to put Plaintiff in imminent apprehension of such contact.
9 Additionally, because Plaintiff was a minor during the time herein alleged and lacked the ability
10 to consent to sexual contact with any person.

11 38. In doing the things herein alleged, DEFENDANT TYLER violated Plaintiff's
12 right, pursuant to *Civil Code* §43, of protection from bodily restraint or harm, and from personal
13 insult. In doing the things herein alleged, DEFENDANT TYLER violated his duty, pursuant to
14 *Civil Code* §1708, to abstain from injuring the person of Plaintiff or infringing upon Plaintiff's
15 rights.

16 39. As a result of the above-described conduct, Plaintiff has suffered and continues to
17 suffer great pain of mind and body, shock, emotional distress, physical manifestations of
18 emotional distress including embarrassment, loss of self-esteem, disgrace, humiliations, and loss
19 of enjoyment of life; has suffered and will continue to suffer and was prevented and will continue
20 to be prevented from performing daily activities and obtaining the full enjoyment of life; will
21 sustain loss of earnings and earning capacity, and/or has incurred and will continue to incur
22 expenses for medical and psychological treatment, therapy, and counseling.

23 40. Plaintiff is informed and based thereon alleges that the conduct of DEFENDANT
24 DOE was oppressive, malicious and despicable in that it was intentional and done in conscious
25 disregard for the rights and safety of others, and were carried out with a conscious disregard of
26 Plaintiff's right to be free from such tortious behavior, such as to constitute oppression, fraud or
27 malice pursuant to California *Civil Code* §3294, entitling Plaintiff to punitive
28 damages against DEFENDANT DOE in an amount appropriate to punish and set an example of

1 DEFENDANT DOE.

2 **THIRD CAUSE OF ACTION**
3 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
4 **As to Both the Child Sex Assaults and Causing the Ensuing Involuntary Infamy for**
5 **Defendant's Profit**
6 **(Against all DEFENDANTS)**

7 41. Plaintiff repeats, re-alleges and incorporates herein by reference all consistent
8 paragraphs of this Complaint as if fully set forth herein.

9 42. DEFENDANT TYLER intended his outrageous behavior and knew or should have
10 known that extreme emotional distress would likely result. DEFENDANT TYLER consciously
11 and intentionally orchestrated, conducted and participated in the sexual assaults of Plaintiff while
12 she was a minor. In an ongoing pattern of conduct that has existed since the time of the assaults
13 through present day, DEFENDANT TYLER has intentionally publicized the acts he perpetrated
14 upon Plaintiff for his profit and fame. This conduct reached crescendo when his multiple books
15 were published describing the assaults of Plaintiff and other traumatic, painful and private matters
16 for Plaintiff who was a child and victim of a sex crime. DEFENDANT TYLER knew or should
17 have known Plaintiff would be seriously and irreparable harmed.

18 43. When DEFENDANT TYLER's assaults of Plaintiff ceased, he refused to let
19 Plaintiff heal and keep the sexual abuse private from her community and family. While Plaintiff
20 had kept her past private, DEFENDANT TYLER's conduct included, but was not limited to
21 publishing information about his assaults of Plaintiff that caused the public to identify Plaintiff as
22 a victim of childhood sexual assault, trauma and a coerced abortion.

23 44. DEFENDANT TYLER's conduct as alleged throughout this complaint was
24 outrageous in various ways including, but not limited to, assaulting Plaintiff and displaying his
25 abuse of her at the time it was occurring and from that day forward to the present. Because of the
26 status of DEFENDANT TYLER as a world famous rock star he achieved special status and
27 power in the media and world generally. DEFENDANT TYLER abused this position of power
28 afforded to him by fame by describing his assaults of Plaintiff in various media outlets including,
but not limited to his books, memoirs and other public statements knowing that Plaintiff would be

1 susceptible to mental distress and acting intentionally or unreasonably with full recognition that
2 his acts would cause mental distress.

3 45. DEFENDANT TYLER's conduct exceeded all bounds of decency and is odious
4 and utterly intolerable in a civilized society.

5 46. DEFENDANT TYLER's conduct was intentional and/or reckless.

6 47. DEFENDANT TYLER's conduct caused emotional distress in the minor Plaintiff
7 and this emotional distress was and continues to be severe and extreme.

8 48. As a result of the above-described conduct, Plaintiff has suffered and continues to
9 suffer extreme emotional distress, physical manifestations of emotional distress, embarrassment,
10 anxiety, fear, nightmares, terror, shame, symptoms of PTSD, loss of enjoyment, loss of trust,
11 guilt, loss of income, and was prevented and will continue to be prevented from performing daily
12 activities and obtaining the full enjoyment of life, and/or has incurred and/or will continue to
13 incur expenses for medical and psychological treatment, therapy, and counseling.

14 49. As a result of the above noted conduct, Plaintiff has against her will become a
15 central figure in a scandal that has deprived her of the ability to proceed under a pseudonym or
16 "Jane Doe" in this very lawsuit because confidentially of her identity, likeness and privacy rights
17 normally afforded to a victim of child sex crimes was ripped aside by DEFENDANT TYLER's
18 actions. DEFENDANT TYLER forced upon Plaintiff a constant state of involuntary infamy. This
19 infamy manifests as disgrace, dishonor, disrepute and feeling a constant state of being known for
20 a depraved and shameful sexual act (when in reality Plaintiff was the victim of a bad act –
21 childhood sexual assault).

22 50. As a result of the above noted conduct, Plaintiff was required to make disclosures
23 of private, traumatic, painful and personal nature from her personal life that would not have been
24 made otherwise. These disclosures caused Plaintiff extreme and ongoing damages and pain and
25 suffering.

26 ///

27 ///

28 ///

PRAYER FOR RELIEF

Wherefore, Plaintiff prays for Judgment against Defendants as follows:

1. For past, present and future general damages in an amount to be determined at trial;
2. For past, present and future special damages, including but not limited to past, present and future lost earnings, economic damages and others, in an amount to be determined at trial;
3. Any appropriate statutory damages, including but not limited to attorneys' fees;
4. For costs of suit;
5. For pre- and post- judgment interest as allowed by law;
6. For attorneys' fees pursuant to the aforementioned statutes and otherwise allowable by law:
 - a. *California Code of Civil Procedure* §1021.5;
7. For exemplary and punitive damages in an amount to be determined at trial;
8. For disgorgement of all monies and profits derived from defendant's memoirs, statements and publications; and,
9. For such other and further relief as the court may deem proper.

DATED: February 1, 2023

JEFF ANDERSON & ASSOCIATES PA



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DEMAND FOR JURY TRIAL

A trial by jury is hereby demanded by Plaintiff.

DATED: February 1, 2023

JEFF ANDERSON & ASSOCIATES PA



MICHAEL RECK
Jeff Anderson & Associates,
Attorneys for Plaintiff,
JULIA MISLEY

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