

KINSELLA WEITZMAN ISER KUMP HOLLEY LLP
11766 WILSHIRE BOULEVARD, SUITE 750
LOS ANGELES, CA 90025
TEL 310.566.9800 • FAX 310.566.9850

1 KINSELLA WEITZMAN ISER KUMP HOLLEY LLP
SHAWN HOLLEY (SBN 136811)
2 sholley@kwikhlaw.com
ALAN KOSSOFF (SBN 150932)
3 akossoff@kwikhlaw.com
KATHERINE T. KLEINDIENST (SBN 274423)
4 kkleindienst@kwikhlaw.com
KATE MANGELS (SBN 301811)
5 kmangels@kwikhlaw.com
11766 Wilshire Boulevard, Suite 750
6 Los Angeles, CA 90025
Telephone: 310.566.9800
7 Facsimile: 310.566.9850

8 Attorneys for Defendant Steven Victor Tallarico
a/k/a Steven Tyler

9
10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF LOS ANGELES, TORRANCE COURTHOUSE**

12 This Matter Relates to:

13
14 JULIA MISLEY, formerly known as JULIA
HOLCOMB, an individual,

15
16 Plaintiff,

17 vs.

18
19 STEVEN VICTOR TALLARICO A/K/A
STEVEN TYLER, an individual; and DOES 2
20 through DOE 50, inclusive,

21 Defendant.

Case No. 22TRCV01604

Assigned to Hon. Gary Y. Tanaka, Dept. B

**DECLARATION OF KATHERINE T.
KLEINDIENST IN SUPPORT OF
DEFENDANT'S NOTICE OF SPECIAL
MOTION TO STRIKE AND SPECIAL
MOTION TO STRIKE PORTIONS OF
PLAINTIFF'S FIRST AMENDED
COMPLAINT PURSUANT TO CODE OF
CIVIL PROCEDURE § 425.16 AND FOR
ATTORNEYS' FEES**

[Notice of Motion and Motion, Declaration of
Steven Victor Tallarico, Notice of Lodging,
and Proposed Order filed concurrently
herewith]

Date: October 24, 2023

Time: 8:30 a.m.

Dept.: B

Reservation ID: 916961637632

Action Filed: December 27, 2022

Trial Date: None Set

DECLARATION OF KATHERINE T. KLEINDIENST

I, Katherine T. Kleindienst, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am a partner with Kinsella Weitzman Iser Kump Holley LLP, attorneys of record for Defendant Steven Victor Tallarico a/k/a Steven Tyler. If called as a witness, I could and would competently testify under oath to all the facts within my personal knowledge except where stated upon information and belief.

2. Attached hereto as **Exhibit 1** for the Court’s convenience is a true and correct copy of the First Amended Complaint filed by Plaintiff Julia Misley, which has been highlighted to identify the portions of the Complaint that Mr. Tyler seeks to strike through this motion.

3. Attached hereto as **Exhibit 2** is a true and correct copy of a May 24, 2011 article entitled “The Light of the World – the Steven Tyler and Julia Holcomb story,” which I accessed on April 5, 2023 at <https://www.lifesitenews.com/news/the-light-of-the-world-the-steve-tyler-and-julia-holcomb-story/>.

4. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts from the book *Walk This Way: The Autobiography of Aerosmith*, published in 1997 by Avon Books, a division of The Hearst Corporation. I have the physical book and can produce it to the Court upon request.

5. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts from the book *Does the Noise in My Head Bother You?: A Rock ‘N’ Roll Memoir* by Steven Tyler, published in May 2011 by HarperCollins. I have the physical book and can produce it to the Court upon request.

6. Attached hereto as **Exhibit 5** is a true and correct copy of Plaintiff Julia Misley’s Response to Defendant Steven Tyler’s Request for Admissions, Set One, which was served on our firm on April 24, 2023.

7. Attached hereto as **Exhibit 6** is a true and correct copy of Plaintiff Julia Misley’s Response to Defendant Steven Tyler’s Special Interrogatories, Set One, which was served on our firm on April 24, 2023. Third-party names and contact information have been redacted out of an abundance of caution to protect their privacy.

1 8. Attached hereto as **Exhibit 7** is a true and correct copy of Plaintiff Julia Misley’s
2 Response Defendant Steven Tyler’s Form Interrogatories, Set One, which was served on our firm
3 on April 24, 2023. Third-party names and contact information have been redacted out of an
4 abundance of caution to protect their privacy.

5 9. Attached hereto as **Exhibit 8** is a true and correct copy of a *Rolling Stone* article
6 entitled “Aerosmith: Hard Rock’s Down and Dirty Heroes,” dated August 26, 1976, which I
7 accessed on April 26, 2023 at [https://www.rollingstone.com/music/music-news/aerosmith-hard-](https://www.rollingstone.com/music/music-news/aerosmith-hard-rocks-down-and-dirty-heroes-99418/)
8 [rocks-down-and-dirty-heroes-99418/](https://www.rollingstone.com/music/music-news/aerosmith-hard-rocks-down-and-dirty-heroes-99418/).

9 10. Attached hereto as **Exhibit 9** is a true and correct of the cover of the August 9,
10 1976 edition of *People* magazine, and an article entitled “Aerosmith’s Heavy Mettle has Made
11 Steve Tyler America’s Hottest Home-Grown Rocker.”

12 11. Attached hereto as **Exhibit 10** is a true and correct copy of the October 12, 1997
13 New York Times Best Sellers Lists for Fiction and Nonfiction, which I accessed on April 20, 2023
14 at <https://timesmachine.nytimes.com/timesmachine/1997/10/12/412104.html?pageNumber=139>.
15 *Walk This Way* by Aerosmith appears at Number 12 on the Nonfiction list.

16 12. Attached hereto as **Exhibit 11** is a true and correct copy of an August 6, 2008
17 article entitled “Write this Way: Aerosmith singer to write memoir,” which I accessed on April 24,
18 2023 at [https://www.reuters.com/article/us-tyler/write-this-way-aerosmith-singer-to-write-](https://www.reuters.com/article/us-tyler/write-this-way-aerosmith-singer-to-write-memoir-idUSN0643906920080807)
19 [memoir-idUSN0643906920080807](https://www.reuters.com/article/us-tyler/write-this-way-aerosmith-singer-to-write-memoir-idUSN0643906920080807).

20 13. Attached hereto as **Exhibit 12** is a true and correct copy of a June 24, 2011 article
21 in the *New York Times* entitled “Steven Tyler’s Warp Speed Memoir,” which I accessed on April
22 20, 2023 at [https://www.nytimes.com/2011/06/26/books/review/book-review-does-the-noise-in-](https://www.nytimes.com/2011/06/26/books/review/book-review-does-the-noise-in-my-head-bother-you-by-steven-tyler.html)
23 [my-head-bother-you-by-steven-tyler.html](https://www.nytimes.com/2011/06/26/books/review/book-review-does-the-noise-in-my-head-bother-you-by-steven-tyler.html).

24 14. Attached hereto as **Exhibit 13** is a true and correct copy of a May 3, 2011 article in
25 *The Hollywood Reporter* entitled “Book Review: Steven Tyler’s Autobiography Shapes Up to Be
26 a Fun Ride,” which I accessed on April 20, 2023 at
27 <https://www.hollywoodreporter.com/news/general-news/book-review-steven-tyler-s-184524/>.

28 15. Attached hereto as **Exhibit 14** is a true and correct copy of a May 9, 2011 article in

1 *Vanity Fair* entitled “Top 10 Revelations in Steven Tyler’s Memoir, *Does the Noise in My Head*
2 *Bother You?*,” which I accessed on April 20, 2023 at
3 [https://www.vanityfair.com/culture/2011/05/top-ten-revelations-in-steven-tylers-memoir-does-the-](https://www.vanityfair.com/culture/2011/05/top-ten-revelations-in-steven-tylers-memoir-does-the-noise-in-my-head-bother-you)
4 [noise-in-my-head-bother-you](https://www.vanityfair.com/culture/2011/05/top-ten-revelations-in-steven-tylers-memoir-does-the-noise-in-my-head-bother-you).

5 16. Attached hereto as **Exhibit 15** is a true and correct copy of the May 22, 2011 *New*
6 *York Times* Best Sellers list, which I accessed on April 20, 2023 at
7 <https://www.nytimes.com/books/best-sellers/2011/05/22/>. *Does the Noise in My Head Bother*
8 *You?* appears at Number 3 on the Combined Print & E-Book Nonfiction list, at Number 2 on the
9 Hardcover Nonfiction list, and Number 3 on the E-Book Nonfiction list.

10 17. Attached hereto as **Exhibit 16** is a true and correct copy of excerpts from the book
11 *Rebel Heart: An American Rock ‘n’ Roll Journey* by Bebe Buell, published in 2001 by St.
12 Martin’s Press. I have the physical book and can produce it to the Court upon request.

13 18. Attached hereto as **Exhibit 17** is a true and correct copy of the “About” page for
14 Life Site News, which I accessed on April 20, 2023 at <https://www.lifesitenews.com/about/>.

15 19. Attached hereto as **Exhibit 18** is a true and correct copy of the Religion News
16 Service article “LifeSiteNews removed from Facebook for violating COVID-19 misinformation
17 policies,” which I accessed on April 20, 2023 at [https://religionnews.com/2021/05/05/lifesitenews-](https://religionnews.com/2021/05/05/lifesitenews-removed-from-facebook-for-violating-covid-19-misinformation-policies/)
18 [removed-from-facebook-for-violating-covid-19-misinformation-policies/](https://religionnews.com/2021/05/05/lifesitenews-removed-from-facebook-for-violating-covid-19-misinformation-policies/).

19 20. A true and correct copy of a video recording of Plaintiff speaking at the 2012
20 March for Life in Washington, DC, which was accessed at the webpage
21 <https://www.youtube.com/watch?v=CgW3EyHGbAc>, will be lodged with the Court as **Exhibit**
22 **19**. Attached as **Exhibit 20** is a true and correct copy of the screenshot of that webpage, which
23 shows that the video was uploaded to YouTube on April 5, 2012.

24 21. A true and correct copy of a video recording of Plaintiff speaking at the 2015 Walk
25 for Life, which was accessed at the webpage <https://www.youtube.com/watch?v=DewBL-Ukljw>,
26 will be lodged with the Court as **Exhibit 21**. Attached as **Exhibit 22** is a true and correct copy of
27 the screenshot of that webpage, which shows that the video was uploaded to YouTube on January
28 28, 2015.

1 22. A true and correct copy of a video recording of Plaintiff’s October 2020 appearance
2 on Tucker Carlson Tonight on Fox News, which was accessed at the webpage
3 https://www.youtube.com/watch?v=JHC4d_LTEExU, will be lodged with the Court as **Exhibit 23**.
4 Attached hereto as **Exhibit 24** is a true and correct copy of the screenshot of that webpage, which
5 shows that the video was uploaded to YouTube on October 28, 2020.

6 23. Attached hereto as **Exhibit 25** is a true and correct copy of screenshots of Julia
7 Holcomb’s professional biography on the Ambassador Speakers website
8 (<https://www.ambassadorspeakers.com/speakers/unique/julia-holcomb/>) as it appeared on April
9 20, 2023.

10 24. Attached hereto as **Exhibit 26** is a true and correct copy of the February 2, 2023
11 article “Diocese’s Weekend for Life for teenagers returns after two-year hiatus following
12 COVID,” which I accessed on April 26, 2023 at the webpage [https://www.arkansas-](https://www.arkansas-catholic.org/news/article/7710/Activist-to-teens-Jesus-mercy-is-available-after-abortion)
13 [catholic.org/news/article/7710/Activist-to-teens-Jesus-mercy-is-available-after-abortion](https://www.arkansas-catholic.org/news/article/7710/Activist-to-teens-Jesus-mercy-is-available-after-abortion).

14 25. Attached hereto as **Exhibit 27** is a true and correct copy of a February 14, 2011
15 Star magazine cover and article entitled “Steven Tyler’s Teen Lover,” which was produced by
16 Plaintiff bearing Bates numbers 000009-11.

17 26. Attached hereto as **Exhibit 28** is a true and correct copy of a Brookline Fire
18 Department “Chief Officers Report of Fire or Other Emergency Call” dated October 23, 1975,
19 which was produced by Plaintiff bearing Bates numbers 000003-04.

20 27. Attached hereto as **Exhibit 29** is a true and correct copy of Plaintiff Julia Misley’s
21 Response to Defendant Steven Tyler’ Demand for Production of Documents, Set One, which was
22 served on our firm on April 24, 2023, and which authenticates the documents Plaintiff produced.

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

25 Executed April 28, 2023, at Los Angeles, California.

26 

27 _____
Katherine T. Kleindienst
28

EXHIBIT 1

1 Michael Reck, State Bar No. 209895
mreck@andersonadvocates.com
2 **JEFF ANDERSON & ASSOCIATES PA**
12011 San Vicente Boulevard, Suite 700
3 Los Angeles, California 90049
Tel: 310-357-2425
4 Fax: 651-297-6543

5 Karen Barth Menzies, State Bar No. 180234
kbm@kbmlaw.com
6 **KBM Law Corp.**
6701 Center Drive West, Suite 1400
7 Los Angeles, California, 90045
Telephone: (310) 363-0030
8 Facsimile: (310) 861-0168

Summons Issued

9 Attorneys for Plaintiff JULIA MISLEY

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
)	Hon. Gary Y. Tanaka
14 JULIA MISLEY, formerly known as JULIA)	Dept. B
HOLCOMB, an individual,)	
)	FIRST AMENDED COMPLAINT FOR
15 Plaintiff,)	DAMAGES FOR:
)	
16 vs.)	(1) SEXUAL BATTERY (CIVIL CODE
)	§1708.5);
17 STEVEN VICTOR TALLARICO A/K/A STEVEN)	(2) SEXUAL ASSAULT;
18 TYLER, an individual; and DOES 2 through DOE)	(3) INTENTIONAL INFLICTION OF
19 50, inclusive,)	EMOTIONAL DISTRESS
)	
20 Defendant)	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,

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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**
25 **SEXUAL ASSAULT**
26 **(Against all DEFENDANTS)**

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

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 ///

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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



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

KBM LAW CORP.



KAREN BARTH MENZIES
Attorney for Plaintiff,
JULIA MISLEY

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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

KBM LAW CORP.



KAREN BARTH MENZIES
Attorney for Plaintiff,
JULIA MISLEY

EXHIBIT 2

NEWS

The Light of the World – the Steven Tyler and Julia Holcomb story

For the first time Julia Holcomb, the former fiancée of *Aerosmith* front man Steven Tyler, has opened up about her tumultuous relationship with Tyler, and the abortion she underwent. These are her memoirs.

Julia Holcomb

Tue May 24, 2011 - 8:00 am EDT

In November of 1973, shortly after my 16th birthday, I met Steven Tyler at a concert in Portland, Oregon. To understand what leads a 16-year-old girl to find herself backstage at an Aerosmith Rock Concert, and in a three- year live-in relationship with Steven Tyler, you need some essential background information.

Family Trauma

My biological father abandoned my mother while we were toddlers. He was a charming rogue of a gambler who came and went in our lives, leaving a wake of debt and infidelity. My mother had been encouraged to get an abortion (illegally) by more than one family member when she found out she was expecting me, (the middle child). Thankfully she gave birth to me and later to my younger brother, and was a loving mother. When Daddy's gambling debts caused her small teaching salary to be garnished, she filed for a divorce. Even after the first divorce she had been a good mother, taking us to church, reading us the Bible in the morning before school, singing to us at night, and praying with us for our wandering father. She was gentle and supportive and I always knew I could go to her for help. When mother remarried my first stepfather, (who was an alcoholic) things became difficult.

A devastating trauma struck our family in the summer of 1971 when I was 13 years old. My younger brother was killed in a car accident on our way home from a camping trip with our grandparents. He was 10 years old. My grandfather was also killed, my grandmother lost a leg, and my sister and I were injured. The car accident and family trauma triggered a chain of events that led to my mother and first stepfather to divorce.

My stepfather was committed to a mental hospital briefly, and mother had an emotional breakdown. My sister and I went to live with my aunt and uncle for some months.

When we returned home to my mother after the divorce, things were not the same. My mother seemed wounded and disillusioned with life. Without the stability of the family, or the church, we all struggled to recover from my brother's death. She was still working as a teacher but she was living with my second stepfather, though they were not married yet. He is a man I have grown to love and respect over time, yet in the 1970's, when he was living with my mother, he was a different person than he is today and we disliked each other.

My sister and I were left on our own most of the time. Previously, I had been raised going to church, but after the accident we just never went back. My sister and I became angry and rebellious. My sister left home when she was about 16, and backpacked around the country with her boyfriend. There I was at age 15, my sister gone, and feeling like I was in the way. There was a sense of being an obstacle to my mothers' relationship with this new man.

My friendships changed from the kids we knew at church to the kids who hung out at the local Teen Center. Some of them took drugs and drank.

Meeting Steven Tyler

A few months before I met Steven, while I was still 15, I became friends with a girl who had access to backstage parties at concerts. She was 24 years old, and although our acquaintance was brief, she was a pivotal change in the course of my life, and ours was one of the most dangerous friendships I ever formed.

She quickly taught me to dress in revealing clothes to get noticed and use sex as a hook to try to catch a rock star. I still remember dressing to go to the Aerosmith concert, intending to get backstage with her. I had listened to the song Dream On and seen Steven's photo on the album cover. I went to the concert hoping to meet Steven and after the concert we met for the first time. At that time, I thought he was the best thing in my life. My sad, vulnerable story, as well as my youth and personal attractiveness captured his interest.

My mother signed over guardianship of me to Steven after I had moved to Boston. I remember my surprise when Steven told me she had signed the papers and trying to take this in mentally. A sense of vulnerability came over me, knowing that I was his ward, but we were not married. He had not expressed his intentions of a long-term relationship with me. He had mentioned that he wanted guardianship papers so I could travel across state lines when he was on tour. I had told him my mother would not sign me over to him. I asked him how he had got her to do it. He said, "I told her I needed them for you to enroll in school." I felt abandoned by my mother as well as my father and stepfather. Steven was really my only hope at that point.

I became lost in a rock and roll culture. In Steven's world it was sex, drugs, and rock and roll, but it seemed no less chaotic than the world I left behind. I didn't know it yet, but I would barely make it out alive.

The Pregnancy

When we first lived together I took the birth control pill. It is not true that my pregnancy with Steven was unplanned, as has been written. After some months together, Steven spoke to me of his desire to have a child. He had grown up in the New Hampshire countryside and at times he behaved like a down-to-earth farm boy. He wanted a family and he asked me if I was willing to have a child with him. I was touched by his sincerity and said yes. I wanted children, and began to believe he must truly love me since he had made himself my guardian and was asking to have children with me. He threw my birth control pills off the balcony of the hotel where we were staying, into the street far below.

Within a year I became pregnant. I had never been pregnant before, contrary to what Steven has written. At first Steven and I were both happy about the baby. I remember telling him, "I'm pregnant" and from his reaction I believed he was truly excited. He asked me to marry him a few months later and I said, "yes." He took me to New Hampshire to tell his parents about the baby and the marriage. He asked his grandmother if he could give me her wedding ring. His parents were conflicted about the idea of Steven and I marrying. His mother was supportive of everything Steven wanted and I remember truly loving her. She was such a kindhearted lady, with a wonderful sense of humor. His father had grave reservations because of my youth and immaturity.

His grandmother declined to give us the ring. She loved Steven but expressed concerns that if we divorced, the ring would leave the family. Things went quickly downhill from there for the two of us. When we left that night, Steven and I had a heated argument: I felt he should buy me a ring at a jeweler and we should get married anyway. He did not.

Looking back, I do not fault him for a change of heart after his parents expressed concerns. Marriage is a serious step that should not be jumped into, even when a baby is on the way. Still, I was in a bad position. I thought I loved him, I wanted to marry him, and he had asked me to marry him; now the wedding was off and I was very angry with him for not standing by me. It seemed like a cowardly change of heart after he had asked me to have a baby with him and purposefully set out to get me pregnant. For the first time I realized that I should not have been foolish enough to conceive a child outside of marriage with a man who might not be interested in a life-long relationship. His guardianship of me complicated things further. I was subordinate to him as in a parent relationship and felt I had little control over my life. I had trusted him and now was the moment of truth.

The Fire

It was the fall of 1975. We returned to our apartment in Boston, and within a few weeks he was touring with his band. I was alone and pregnant in the apartment with no money, no education, no prenatal care, no driver's license and little food.

Steven would call me every day to check in with me and I asked him for money to get groceries. He promised to send Ray Tabano over the next day to take me shopping. Ray was a childhood friend of Steven's and had been a guitar player in the original band. I remember waiting by the window for Ray to arrive. He came to the apartment and I let him in through the front door.

The next thing I remember was waking up in a cloud of dense smoke fighting for air to breathe. Ray was gone. I fell to the floor from the couch in the front room. The couch was not burning and I had no burns on my body, but thick black smoke was consuming the room. The smoke was less dense on the floor, but still, I could barely see.

I was frightened but calm enough to think about a series of commercials that Bill Cosby had done called, *Learn Not To Burn*. One message had been, if you're in a smoke-filled room, get down on the floor because the air is clearer on the floor. I knew I only had minutes to get out of that apartment. I crawled to the front door, which was next to the couch I had been laying on. The apartment had at least three locks on the front door. There was a keyed lock on the handle, a dead bolt and a security bar that angled from the door down to the floor. Steven insisted on keeping these locked at all times because he usually kept drugs in the house and he had suffered a break-in at our previous apartment on Beacon Street. All of the locks were secured and I could not budge the security bar. I was choking and knew I needed to head for the back stairway that led down to the kitchen and an outside exit.

When I got to the stairs, smoke and heat and flames were pouring up the stairway. The railings were scorching hot at the top. I burned one of my hands grabbing the railing before I realized it was impossible to climb down those stairs through that fire. There was no way out.

Bill Cosby was there in my mind again. He had said in one of those commercials, if you're trapped in a fire, a good place to seek shelter is an empty fireplace. I crawled to the fireplace in our bedroom and lay down inside it. It was empty and clean and the flue was open. Black smoke filled the air and was boiling up the chimney, but there was a small pocket of air on the floor where I was laying. As I began to fall unconscious, I knew I was about to die. I was frightened and I felt so alone. I believed I deserved to go to hell because of my many sins and I did not feel prepared to die.

Above the fireplace hung a picture of the child Jesus called *The Light of the World*, by Charles Chambers. The picture had hung in my Grandmother's classroom where she taught first grade. I had been one of her students when I was 5 years old. I used to look up at that picture every day in school when Grandma would open the class in prayer. One year the schools decided to take down all pictures of Jesus and forbid prayer in the classroom, so my Grandmother took the picture home. It hung in her living room for years, and at her death I was given the picture as a memory of her.

When I told my mother that I was pregnant, she sent the picture to me and I hung it over the fireplace in Steven's apartment. Now, I was lying beneath it, close to death. I thought of my grandmother, remembering one of the Bible verses she taught me and prayed:

"Into your hands I commend my spirit, thou hast redeemed me Oh Lord God of truth."

I was thinking of Jesus' final words on the cross as a means of pleading for mercy. I did not expect to live and yet I felt great peace as I closed my eyes.

The Nightmare Deepens

I woke up in the hospital. There was an IV in my arm and a doctor was speaking to me slowly, like one speaks to a child. He asked, "Do you know your name?" "My name is Julia Holcomb," I answered. He asked more questions and he was relieved to see that in spite of severe smoke inhalation I had not suffered brain damage. The baby I was carrying also survived the fire.

Steven was there in my hospital room. He said he was happy to see me alive and appeared very shaken. Steven told me they had been taking my blood oxygen count from an artery in my wrist. The last time the nurse had taken it, she had shed tears because she thought I would not make it, and said sadly “She’s so young.” Steven told me the doctor did not expect me to live, and thought that if I lived there would be brain damage from the lack of oxygen. He gave me a teddy bear and I clung to it. He told me I had received many cards and flowers from people wishing me well. I was too weary to talk and I drifted off again.

In the hospital a doctor came into my room and said that my lungs were remarkably clear of smoke damage. He said Steven had spoken to him about the possibility of my having an abortion, since I was so young and recovering from smoke inhalation. I was surprised and I asked him if the baby was OK. He smiled and reassured me that the heartbeat sounded good and the baby seemed fine. I told him I would not have an abortion. I wanted my baby. The doctor was kind and supportive of my decision. He did not pressure me in any way. He asked me if I had taken drugs while I was pregnant. I said, “Yes, sometimes.” (I did on occasion use cocaine but not to the degree that Steven was abusing.) The doctor told me that drugs were bad for me, and bad for the baby. He said I must not take any more while I was pregnant. I was so ashamed because I knew he was right. I said, “OK” and intended to stop.

The Abortion

The doctor left the room and Steven came in. He told me that I needed to have an abortion because of the smoke damage to my lungs and the oxygen deprivation I had suffered. I said “No,” I wanted the baby. I was five-months pregnant. I could not believe he was even asking me to have an abortion at this stage. He spent over an hour pressing me to go ahead and have the abortion. He said that I was too young to have a baby and it would have brain damage because I had been in the fire and taken drugs. I became very quiet and repeated the answer “No” more than once. I said I should not be asked to make that decision while still in the hospital. He said I had to have the abortion now. He said I was too far along to wait because it would be illegal for me to get an abortion in another week.

He sat beside my hospital bed, but we did not look at each other. I said no again. Finally he gave up and said, “OK, you can go home to your mother’s and have the baby there.” I was worn out and began to feel hopeless. My mother and stepfather would not be happy to have me return home pregnant. I believed they would also want me to have an abortion. I began to feel like life was caving in on me. I had no health insurance or money and did not believe Steven intended to help provide for our baby or me. He had not been providing medical care for me up to that time. I believed he was abandoning me as my father and my mother had. I began to cry and agreed to have the abortion. Steven was relieved and happy. He reassured me that he cared for me and that after the abortion everything would be fine.

I was moved to another part of the hospital and a different doctor performed the abortion. It was a horrible nightmare I will never forget. I was traumatized by the experience. My baby had one defender in life; me, and I caved in to pressure because of fear of rejection and the unknown future. I wish I could go back and be given that chance again, to say no to the abortion one last time. I wish with all my heart I could have watched that baby live his life and grow to be a man.

The doctor did not explain what the procedure would be like. Steven watched when the doctor punctured my uterus with a large needle. Then I was taken to a room to wait for the contractions. Steven sat beside me in the hospital until it was over. When the nurse would leave the room he was snorting cocaine on the table beside my bed. He even offered some to me once, but I just turned away, sick inside. Steven, high on cocaine, was emotionally detached, witnessing the procedure but cut off from the normal reaction and feelings of horror you would expect. At the time I was shocked and hurt by his behavior.

But I know now that on an unconscious level, he must have been traumatized witnessing the death of his first-born son in such a horrific and direct way. Steven watched the baby come out and he told me later, when we were in New Hampshire, that it had been born alive and allowed to die. (I was not allowed to see the baby when it was delivered.) Steven told me later that it had been a boy and that he now felt terrible guilt and a sense of dread over what he had done. I did not know that such a thing could be legal. I could not imagine a world where a tiny baby could be born alive and tossed aside as worthless without ever seeing his mother's face.

Nothing was ever the same between us after that day, though I did not return home for over a year. I became very quiet and withdrawn after the abortion. I was grieving the loss of my baby and I could never look at Steven again without remembering what he had done to our son and me. I had just lived through a horrific fire that nearly claimed my life, but the abortion made me feel like part of me died with my baby. I felt cheated and betrayed, and angry with myself for agreeing to something that I knew was wrong. I felt deep anger and almost hatred for the doctor who performed the abortion.

Everyone around me seemed to be moving on with life, but I was carrying a wound that would not go away. Steven was already involved with other women at that time. The fact that he was my guardian complicated things for him because he was legally responsible for me. I was young, had dropped out of high school, and did not understand my legal rights at the time. I felt completely powerless.

I left Steven in February 1977 and returned to live with my mother and stepfather. Steven called a few times after I returned home and then I never heard from him again.

Rising Out of the Ashes

The road to recovery was a slow process. When I returned home to my mother I was a broken spirit. I could not sleep at night without nightmares of the abortion and the fire. The world seemed like a dark place. My mother and stepfather now had a handsome little boy. He was a joy and I could not help but be happy when I was with him. My love for my half brother opened my heart toward my stepfather and I began to see that he was trying to be a good husband and father.

Mother had found that she missed the church and they were attending a United Methodist church in our area. I began attending with them and I remember a turning point for me was a week-long church retreat in the summer at the Oregon coast. There were young adults my own age, sing-alongs, campfires, Bible studies, prayer meetings, and I left there with a renewed sense of hope that God existed; He loved me in spite of my sins, and I could find forgiveness and a measure of real happiness within a family of my own if I began to rebuild my life.

Soon I was baptized. Mother helped me to get my GED, and I got my first job working as a receptionist. I began to attend youth activities, and the church became a lifeline that pulled me out of the fog of grief, sorrow, and guilt after my years with Steven. I found forgiveness in Jesus. I forgave myself, I forgave my mother and stepfather, and I prayed for the grace to forgive Steven.

I gained the confidence to move out and enroll in college. I rented a room of my own from an elderly widow who lived near the campus. That is when I met Joseph, who is now my husband.

My husband is my true hero. He has been a loving husband, a generous father, and hard-working provider for our family. My husband loves me and has forgiven me from his heart and has not let my past define his understanding of who I am as a person. If I had kept my baby I believe Joseph and I would still be married today, and our lives would be richer because of his presence in our family. God has been generous in giving us the joy of children and grandchildren who are a constant reminder of God's presence in our life. I am amazed at the way God has protected me over the years.

Today I am a pro-life Roman Catholic, the mother of seven children, and this year my husband and I will celebrate our 30th wedding anniversary. Joseph and I have six children of our own, and I give thanks for each of them, as they are truly a gift from God. We are also legal guardians to a beautiful little girl whose young mother made the choice for life in a difficult pregnancy, and then entrusted her to our care.

Joseph and I joined the Catholic Church, as adults through the RCIA process in 1992. The Catholic Church's teaching on respect for life, as well as the sacrament of confession, has brought me an even deeper level of healing and peace. We have been active in ministries within the church that support the family, marriage and respect for life.

Setting the Record Straight

To set the record straight: I was never pregnant before I met Steven Tyler, nor did I ever have a previous abortion and Steven knows this to be true. I do not believe I started the fire that burned his apartment, but I am thankful to God for the brave firemen who pulled me out of that burning building. I never asked him for any money after I returned home. I came to him with nothing and I left him with nothing, except regrets. Although I presented myself to him in a highly sexualized way, we did not have sex in public places as he wrote in his new book. His continued gross exaggeration of our relationship is puzzling to me. He has talked of me as a sex object without any human dignity. I have made a point over these long years never to speak of him, yet he has repeatedly humiliated me in print with distortions of our time together. I do not understand why he has done this. It has been very painful.

Love Survives

In spite of everything, I do not hate Steven Tyler, nor am I personally bitter. I pray for his sincere conversion of heart and hope he can find God's grace. I know that I am also responsible for what happened that day. Someone may say that my abortion was justified because of my age, the drugs, and the fire. I do not believe anything can justify taking my baby's life. The action is wrong. I pray that our nation will change its laws so that the lives of innocent unborn babies are protected.

I pray that all those who have had abortions, or have participated in any way in an abortion procedure, may find in my story, not judgment or condemnation, but a renewed hope in God's steadfast love, forgiveness and peace.

Our nation's young girls, especially those like me, who have experienced trauma and abuse, and are vulnerable to exploitation should not be used as sexual playthings, scarred by abortions to free their male partners from financial responsibility, and then like their unborn children, tossed aside as an unwanted object.

Marriage and the family are the building blocks of all virtuous societies. I learned this lesson in a trial by fire that taught me to trust God's plan no matter what occurs. I pray that our nation may also find its way back to God by respecting the life of unborn children and strengthening the sanctity of marriage.

* * *

After I was out of the hospital and recovered from the fire, Steven Tyler brought me my picture of Jesus, *The Light of the World*, and gave it to me. He said it was the only thing that had survived the fire. It was covered with black soot, and the paper backing was singed, but I cleaned it and it is now hanging in the entry of my home.

I am the light of the world. Whoever follows me will not walk in darkness, but will have the light of life. (John 8, 12)

Sincerely,
Julia Holcomb

*Kevin Burke, LSW, is a Pastoral Associate of **Priests for Life** and co-founder of **Rachel's Vineyard** – a post abortion healing ministry of Priests For Life offering Weekend Retreats across the U.S. and around the world for post abortive mothers and fathers, siblings and grandparents suffering after abortion loss. Kevin is author of Redeeming a Father's Heart and can be reached at rachel@rachelsvineyard.org*

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THE
AUTOBIOGRAPHY
OF AEROSMITH

Aerosmith with Stephen Davis

WALK
THIS
WAY



The
Autobiography
of Aerosmith

Aerosmith

with
Stephen Davis

Avon Books  New York

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'74, early '75, to find that Frank had booked us into a gig at Shrewsbury High near Boston. I knew things had changed because the kids went *berserk* for us to a degree we hadn't seen before. Frank pulled out a choke-a-horse roll of money, and I got the feeling that this is the way it could be. At Boston College, we played the field house and there was a riot. Frank booked us into a new club called the Box, where the Psychedelic Supermarket had been in the sixties. We did a sound check and they were still painting the old garage. That night 5,000 kids showed up to see us, the police panicked, and the city pulled the club's operating license the next day.

These were the first previews Aerosmith had of how it was going to get.

Terry Hamilton: Tom and I got married early in 1975 at my parents' house in a terrible blizzard—just family. We had a reception a month later and there was another blizzard. We moved upstairs to a bigger apartment at 1482 Beacon and paired off like everyone else. Joe and Elyssa were in another apartment on Beacon, Brad and Lori were in Framingham, Joey was a cool bachelor living in Newton with several girlfriends, and Steven was living with a very young girl named Diana Hall [Editor's note: This is a pseudonym.] in a little carriage house on Goddard Avenue in Brookline.

Diana was a sweet little girl, fifteen years old, whose parents had signed her over to Steven as her legal guardian so she could be with him. What kind of parents would do this? I don't know. When Steven would overdose, Diana would call us and Tom and I would rush over. It was a pretty strange relationship all around.

Laura Kaufman: Steven met Diana in Portland. She was cute, innocent, fourteen, way too young. But he fell for her and I truly believe Steven was really in love with her, because he had to sign guardianship papers for her to come and live with him. Her parents had to agree to this and I remember it took lawyers and cost real money. I remember thinking, he must really love her to go through with this in order to be with her. She was no piece of meat to him. Girls threw themselves at him twenty-four hours a day. He could have been with anyone. But he wanted Diana, and they were together for a long time, maybe three years. He dressed her up as Little Bo Peep, made her wear *outfits*, for God's sake, little schoolgirl frocks. No one could believe this, it was so outrageous.

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Steven Tyler: Diana. You heard about her? She was a skinny young malchick, much younger than me, like fourteen when I met her in Seattle backstage after a show. She was there with a bunch of her girlfriends and they were being bisexual to get my attention and I was aroused to no end. Because nothing turns me on like being in a room with two women. All guys think about it, but few have done it. It's the most beautiful thing, immersed in *yoni*, like being between Mother's breasts again.

I brought her back to Boston because I was so in love with her. She was so young, so skinny, really beautiful; she had more legs than a bucket of chicken. She was mysterious and as sexual as I was. She just wanted to hang around all day and do it and then talk about it afterward. It was like incredible—and so delicious.

Her parents wouldn't let her leave at first. So I went to her house one night and her parents said it was OK for me to sleep over and I just thought, *Wow*. Eventually she moved to Boston and we carried on for three years, although it seems much longer to me because we were getting real high too.

Jack Douglas: Aerosmith was a different band when we started the third album. They'd been playing *Get Your Wings* on the road for a year and had become better players—different. It showed in the riffs that Joe and Brad brought back from the road for the next album. *Toys in the Attic* was a much more sophisticated record than the other stuff they'd done.

I think we did preproduction in the attic at Angus Studios in Ashland, Mass., where we rehearsed until we could do it in our sleep. *Toys* was the first time the band came off a tour prepared to record. They had a lot of energy, road energy, and they didn't have to go on sabbatical or take time out to play with their new toys. They wanted to get into making a record.

They had ideas from playing in hotel rooms. Tom had an incredible lick. They had the riffs to "Walk This Way" and "No More No More." All this stuff came from the road. We had an acoustic piano and wrote everything out on a chalkboard, so if we lost an idea in the purple haze of the studio we could get it back. We created our own alphabet and language. Joey wrote his own arrangements so every cymbal crash was orchestrated, but there was still room for improvisation. We worked hard and preproduction lasted a long, long time with rough, challenging rehearsals.

Steven's lyrics always came last, after we had the instrumental

tracks. Steven had a good work ethic that he'd gotten from his dad, but the other guys didn't take him seriously because they knew he'd be the first guy out of there. When we were working on vocals, I always had Steven live with me. Steven would work on lyrics and we'd feed off each other. I'd try to compete with him and see who could come up with the best line. If mine was good, he'd always top me. We were looking for humor, irony, sex, drugs, in a way that could get on AM and FM and kids could dig, without it being lewd. Like on "Walk This Way": We had that funky track, we loved it, but it was so tough to get lyrics.

Joe Perry: When we started to make *Toys in the Attic* [in January 1975], our confidence was built up from constant touring. I don't feel great about saying it was drugs, but the plain truth is we were beginning to make money and could afford better dope.

On our first two records, we were low on the food chain of drugs. Then we started to get hold of high-velocity un-stepped-on Peruvian cocaine and the whole thing kind of took off. Some of us were quiet, insecure kids from the suburbs who got ahold of this ego enhancer and just went with it *in extremis*.

Tom Hamilton: Something happened during the *Wings* sessions that really got to me. I was stoned on a joint, a little blow, a couple of beers, and something led to Jack telling me I was an asshole. "Tom, you're an asshole." I was freaked and humiliated, and this became an event that went into the bank and started earning interest.

When it came time to practice for *Toys*, I was still in shock, mostly about my playing. So I got a little coke and started to practice for hours every day, major calisthenics, so my fingers got really strong and nimble. It was one of those instances where I used coke responsibly, the way it could be used if it weren't so addictive; as an energizer and mind-clearer. When we started *Toys*, I felt better about my playing for once, that it was up to this higher level where the rest of the band had already progressed.

We were rehearsing in an old barn west of Boston, and Jack was staying at the Copley Plaza in town, so every morning I picked him up and drove him to work while he read me *The New York Times* he always had under his arm. The rehearsals were great because Jack was lots of fun, always laughing, totally open to new ideas. If I had the germ of something, like the bass line to "Sweet Emotion," he'd encourage me to develop it. That's how that whole album got done.



Joe Perry after being bitten by Elyssa, 1974

(KRAMER COLLECTION)

anymore, you're always off with her. What the fuck's up? You're always going away from me. I never see you!"

I confronted Joe with this. I was upset and made the mistake of baring my soul to him, because there was a certain amount of anguish. One of the most important bonds in my life was breaking before my eyes. It was a mistake because now Joe and Elyssa had a joke. Every time I came around, they would mimic me and make fun of what I said. I even confronted Elyssa. I said, "Elyssa, all right, I love you. But I also love Joe and he's my comrade and I never see him anymore because you guys are always together and it's interfering with our work."

They would look at me and listen, but when I'd leave they'd have

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their laugh. It was pretty painful. They got married a couple of weeks after we got back from Hawaii.

Elyssa Perry: We were supposed to get married earlier, but we had to keep changing the date because they kept adding shows and extending the tour. We finally settled on August 5 and booked the Ritz, the most elegant hotel in Boston, overlooking the Public Garden. We had our four parents, our two sisters, my cousin Cosmo Taglino the lawyer, and Mr. Whitehorn, a justice of the peace we found in the Yellow Pages. The Ritz was totally horrified by our guests, who arrived in full rock 'n' roll regalia. They totally lost it when Steven arrived in feathers.

Joe Perry: I had to talk my way upstairs, and I was the fuckin' groom.

Maxanne Sartori: Joe and Elyssa's wedding was a formal affair and people were dressed for the evening and there was a lot of good champagne. Elyssa's mother had had a couple, and when the guy asked Elyssa, "Do you take Anthony Joseph as your lawful wedded husband?" Mrs. Jerret, who'd never heard Joe's full name, blurted out, "Who the hell is this Tony guy anyway?"

Joe Perry: After the vows, during the champagne toasts, I slipped upstairs with Steven and snorted some heroin. Really strong heroin. We went back down and it was all I could do to keep from throwing up on the cake. Our families were there, my father. It was a weird scene.

Elyssa Perry: Joe's dad was very ill with cancer by then and died that fall, which was a real blow to Joe and probably explains what happened to us with heroin afterward. Anyway, they might have had a couple of days off. Our honeymoon had to wait. They had a hit record and were back on tour immediately.

Steven Tyler: Come live with us for a week on the road at the end of August 1975, as *Toys in the Attic* is certified a gold album and reaches #11 in *Billboard*. "Sweet Emotion," released as a single in May, is a Top 40 record.

On August 23, we take United Flight #217 from Boston to Cleveland, where we open for Rod Stewart and the Faces before 80,000 fans

at sold-out Cleveland Stadium. Also on the bill: Uriah Heep and Blue Öyster Cult. We do our show. I played my harp, shook my maracas, walked the dog, swung the mike stand, pointed, pranced, and danced. At nine that night, we caught Northwest Flight #28 to Philadelphia and limoed to a Holiday Inn near Trenton. At ten the next morning, we did a sound check at the New Jersey State Fairgrounds, where we headlined that night in front of 20,000 kids with Poco, Slade, and Nils Lofgren opening.

We stayed that night at the Holiday Inn and flew back to Boston on Delta Flight #270 the next day, August 25. I got home to find the apartment Diana and I shared at 1736 Beacon Street totally burned out. I think she fell asleep and her cigarette caught the mattress on fire. Diana was badly burned on her arms and in the hospital. She was really too young to leave alone at home, but I couldn't take her on the road with me either.

Two days later, we boarded Eastern Flight #567 to Richmond, Virginia, where we played to 12,000 in Richmond Coliseum with Slade and REO Speedwagon. I blew harp, swung the mike, walked the dog, did somersaults, did two encores, and then back to the Holiday Inn. Next morning, Piedmont Flight #952 to Washington, D.C., where we played to 18,787 at the Capitol Center in Largo, Maryland, with Slade and REO. Blew harp, walked dog, played maracas, swung mike, almost catching Tom Hamilton in the face I was so out of it.

We "slept" at the Sheraton Northeast in Largo and at 1:25 the next afternoon [August 29] caught American Flight #506 to La Guardia, where we played Wollman Rink in Central Park with Ted Nugent opening. We did a sound check because the show was broadcast and Jack Douglas wanted to get it right. We stayed at the Warwick Hotel for the weekend and on Monday [September 1] flew to Toronto on American Flight #354. We played a show at the famous 2,700-seat Massey Hall with the Canadian band Thundermug. Walked dog, blew harp, shook ass, swung mike, almost hitting Brad at the side of the stage, crashed at the Harbor Castle Hotel, and flew back to Boston the next day on Allegheny Flight #508.

Two days later, we flew to Chicago and the whole thing started all over again and we stayed on the road for the rest of the year.

Ray Tabano: In the fall of '75, the band decided it needed a headquarters, like a place to rehearse and hang out in. I was deputized to find, design, and build a clubhouse for Aerosmith. I found an empty

Joe Perry: The last track on *Rocks* was "Home Tonight." Steven could always be counted on to come up with some little piano riff that would be our ballad for the record. And that was it. People ask me about "outtakes" from this record, and I just tell them, "There are none because there was too much happening to record extra stuff." As soon as we had enough songs for an album, we stopped recording and went back on the road.

2: Fire in the Ballpark

Joe Perry: We spent a lot of time waiting for Steven to write lyrics, which held up the albums because we had to have vocals before Brad and I could add the overdubs and backing vocals and we could turn it over to Jack for mixing. When Steven was slow, the sessions could drag on for weeks and we had to cancel or push back ten weeks' worth of gigs that spring [of 1976]. As late as early May, Steven and I were chartering planes in New York, flying up to Boston to rehearse for the summer tour, then chartering back to New York the same night to mix the record. We had one day off in four months.

In April, the band took a break. Elyssa and I went to Jamaica and stayed at a Great House just vacated by the Queen of England, tended by eight servants, because of a booking mixup. When I got back to my apartment, it felt too small. My mantra was: "When you're staying in nicer hotels than where you live, it's time to move." I wanted to have some land to walk around on. So we went house-hunting and bought an Italian-style villa in the Chestnut Hill part of Newton. It was the first house we looked at, an ivy-covered mini-estate with fountains, statues, stained glass, a library, a two-story living room surrounded by a balcony/gallery, and room to build a recording studio in the basement. The place, known locally as the Sears Mansion, was quiet, a little weird, perfect for us. It was secluded enough that you could swim naked in the pool.

So we moved in with our dog Rocky, the Porsche, the Corvette, the Bentley, the old Buick, my gun collection, my guitars. We filed a change of address for my subscriptions to *Soldier of Fortune* and *Crash*

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and *Burn*, which featured gory pictures of fatal motorcycle crashes. The road crew called the place Villa Elyssa.

We knew that *Rocks* was our best album, so it was no surprise when it came out of the chute fast. The black album sleeve with the five white diamonds carried a dedication to the memories of Anthony D. Perry, my father, and our agent, Herb Spar, who had died of cancer a few months earlier. There was a *Rock Dreams*-style painting of the band on the inner sleeve by Atlanta artist Teresa Stokes. A version of this was supposed to be the stage backdrop for the tour, but Steven hated it. It cost us a fortune and was never used. The band also received a producer's credit for the first time, along with Jack Douglas.

Rocks was released in early May to pretty good reviews for us. By May 21, it was our fourth gold album, peaking at #3 and staying on for a year. The first single, "Last Child," made it to #21. It was the biggest year of the booming record industry of the 1970s, and so many albums were being sold they created a new award—platinum albums for sales of 1 million copies or more. (We were told that *Rocks* had actually *shipped* platinum.) The following July they gave us our first platinum record for *Rocks*. We were on tour and the record was said to be selling 10,000 copies or more a day. We had some 100,000-unit weeks.

On May 10, we played Madison Square Garden for the first time, opening for Black Sabbath. Eventually it got to be commonplace to play there, but this first time was very big for us. There was a band plane leaving for New York that afternoon, but Elyssa and I missed it because we'd gotten a bunch of cocaine and Tuinals and got really fucked up. Kelly thought we'd taken the Eastern shuttle earlier in the day, so they took off without us.

At 6 P.M. we hadn't shown up in New York, so some calls got made. We were still asleep in bed in Newton. Elyssa's mom came over but couldn't get into the locked bedroom and started crying at the bottom of the stairs because she thought we were dead. They broke down the door, roused me out of a Tuinal coma, got me dressed, and I caught the 8 P.M. shuttle. I walked into Madison Square Garden, started tuning, and played the show, which began with "Mama Kin" and finished two hours later with a final encore of "Toys."

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"Everybody get back and give the boys plenty of room!" shouts Aerosmith's tour director [Kelly], a burly Irishman who looks like Jimmy Breslin in a Beatle wig. The procession that follows can be

compared only to certain papal rituals. First to emerge are Joe and Brad, cradling their instruments like carbines; then Tom Hamilton followed by Joey Kramer, stocky sweathog drummer, jauntily clicking his sticks in a "V for Victory" like some amiable Fonz imitator. The whole point of this display, Steven Tyler, brings up the rear, a little ragamuffin in cockamamie haberdashery complete with cape and a plumed hat and the fair maiden [Diana] on his arm. After witnessing this progress from dressing room to stage, the show seems almost anticlimactic. (Ed McCormack, "Aerosmith," August 26, 1976)

Joe Perry: Steven's parents were in the first row—it was the first time they'd ever seen Aerosmith. Joey's whole family was there too. The record company party afterward was at the St. Regis Hotel—very posh. Joey and his girlfriend [Nancy Carlson] were wearing matching crushed velvet jumpsuits. Linda Blair, the teenage victim of *The Exorcist*, showed up to have her picture taken with us. There was another party after that at Rick Derringer's. He had a studio behind his house and when it came time for a jam a young TV actor named John Belushi, fresh from the first season of *Saturday Night Live* and not yet a star, sat down at the drums and started to play.

Steven Tyler: A few days later, I'm drunk and eight miles high over cornfields and prairies on a bumpy flight to Los Angeles, where we're headlining the Fabulous Forum. Lisa Robinson, a writer for *Hit Parader*, is sitting next to me. I'm holding one hand over an eye so I don't see double when I look at her. Two tape recorders, mine and hers, are on the fold-down table in front of me, and I'm going . . .

Yeah, I don't have that much fun on the road anymore. It used to be pussy, cars, and money, but you can't write that, can you? No, not much fun, because I'd like to ball everything I see—well, not everything, but at least once a day. But I've had the clap twice now, so . . . you really have to be careful, you know? Hard to have fun anymore . . . I'll tell you what's fun: finding the right stewardess and turning her upside down in the back of the plane. Ever done it? You come so fast, it's the greatest, just knowing you might get caught . . . This pace is ruining me. Look at my face. I fly every day of my life. I put on three coats of moisturizer on the morning so my face doesn't dry out . . . Whaddaya mean, settle down? Are you

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nuts? Have kids? Do you see the way I'm living now? I'd make them insane . . . [Big swoon as plane hits air pocket.] I don't like to fly. I'm always like, "Hey, when's it gonna happen?" I'm on a plane every day for three years. Flying first-class—big deal. All it means is that you'll hit first. That's why I keep this tape recorder with me. At takeoff and landing, I have my finger on the button. If there's a big fuckin' problem, at least my mom will hear me say good-bye.

This drunkologue was published, almost verbatim, and it got back to our families. My mother didn't much care for my comments about the stewardesses. No one else's mother did either. I heard about it.

I had a bungalow at the Beverly Hills Hotel, but the crew was at the Hyatt House on Sunset Strip. The billboard over at Tower Records was for *Helen Reddy's Greatest Hits*. The marquee on the car rental said: WELCOME, AEROSMITH. Diana was with me, sixteen years old and pregnant. People were talking about me marrying her. It was in the air. I was thinking about it. There'd already been abortions with her. Tricky situation all around.

I felt sick backstage at the Forum as I checked out the opening bands: Mott and Montrose. I felt exhausted. I felt like an old shoe. I was twenty-eight years old and felt fifty years older. We had fifty-eight cities left to do. There was so much complaining that we decided this would be the last Aerosmith tour this big. David Krebs was telling the press that after this, touring would be limited and we could concentrate on our records.

We played our show at the Forum and in the middle of "Write Me" I just stopped dead and looked out at the 18,000 kids and didn't even know where I was. *What is this? What am I doing here?* I could sense danger, chaos. Some kid in the audience had pointed a loaded .45 at Ted Nugent not long before. A lot of the M-80s and cherry bombs that kids lit off at the shows sounded like gunfire. I'd see Joe Perry flinch when one of them went off onstage.

I faked the rest of the show, trying to figure out what it was that kept me going. I faked the party afterward at the Forum Club, too stoned on heroin to do anything except wink at Bill Graham and Richard Cole, Led Zeppelin's road manager, who kept insisting that we were the best band in America. Eventually our road manager, Kelly, took a close look at me

and got us out of there. There was San Francisco the next day, Seattle and Portland after that.

LOS ANGELES TIMES

Persistence, youth, and attrition among the front-runners, rather than any distinctive musical style or extraordinarily exciting image, seem responsible for the continued prominence of Aerosmith in the heart of the teenage rock audience, which has apparently transcended the threshold of boredom. (July 1976)

Steven Tyler: We headlined our first stadium show: 80,000 kids in Pontiac Stadium in Michigan [on June 12, 1976]. The place had sold out within twelve hours. They put us into this apartment with lots of food, booze, champagne—all the essentials. Then they took us to the stage through this long tunnel so kids couldn't throw anything at us. You leave this enclosed tube and come out into this giant *whoosshhh*, a huge space you could fly a stunt plane around. The stage was so high and so far from the audience, you couldn't even see any kids, just lines of bullet-head security guys with their backs to us. The whole thing was too abstract. We were in, like, surrealism shock.

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[The audience] came staggering across the parking lot in the still, brackish Michigan dusk and advanced on Pontiac Stadium like a boozy army of hard hats coming to dismantle the place. They looked like hell. Nobody dresses up for concerts anymore.

They gobbled reds and chugalugged beer. They fell on their faces and tumbled down the hill. The oldest among them could not have been more than eighteen years old . . . You had to get close enough to see the red of their eyes to realize that this was a generation whose rock 'n' roll rituals had been raised up out of the ashes of Altamont rather than the bright muck of Woodstock.

Meanwhile, behind the big black curtain [the truss-mounted scrim depicted a giant locomotive], guitarist Joe Perry plugs in his guitar like a grease monkey getting ready to tune a carburetor. Outside the scoreboard flashes FOGHAT LOVES PONTIAC as another of David Krebs's carefully chosen tired-blood opening acts finishes up. Steven Tyler looks like an acrobat in black pajamas.

It's pandemonium out there when Aerosmith's set finally begins with "Mama Kin." The predictably criminal acoustics of the

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oversized hall hardly matter. The faithful seem satisfied watching the tiny figure of Steven throw an impressive temper tantrum, pointing an accusing finger, and shouting, "WOT'S WRONG WITH THE FUCKIN' PA!!!???" (Ed McCormack, "Aerosmith," August 26, 1976)

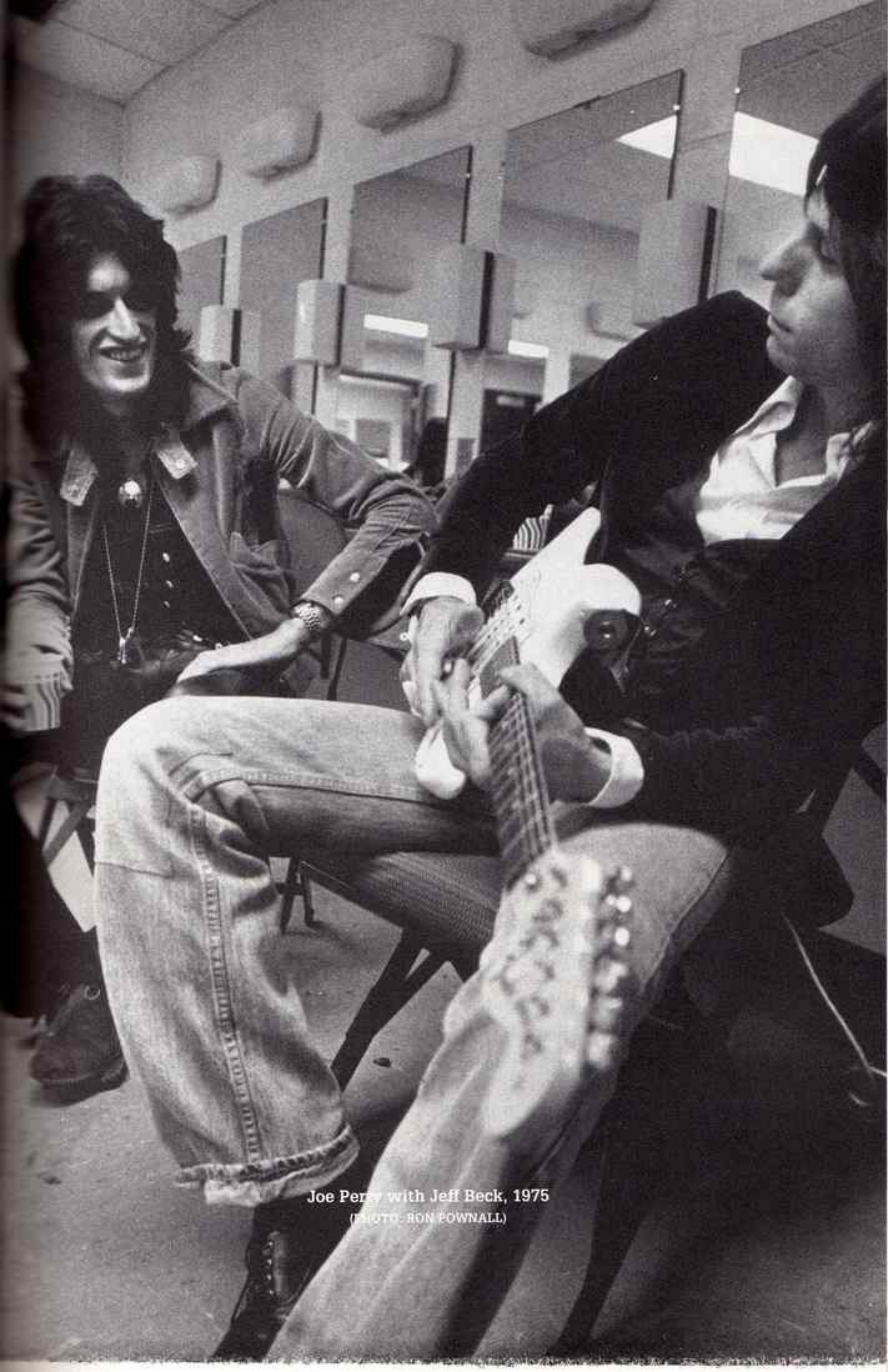
Joey Kramer: My first drum solo was at Pontiac, in front of this crowd. The band kept bugging me to do a long solo, so I planned it out and rehearsed for a long time. It blew the band away and got this ovation-type response from 80,000 people. When I stood up behind the drums at the end, I couldn't believe what I'd done.

I was really starting to get some confidence after years of feeling weird and unsure. We played with Jeff Beck a lot that summer, and his drummer was [Bernard] Pretty Purdie, who was about the best soul-style drummer in the world. One night he stuck around after their set (Jeff Beck was *opening* for us because he was now into his jazz-rock thing) and he told me that he liked what I was doing. Having Pretty Purdie say he dug me really meant a lot.

Joe Perry: Jeff Beck made *Blow by Blow* with George Martin, the Beatles' producer, and it was a hit, his first gold record. He came to Boston to rehearse with Jan Hammer's band and since Elyssa knew him we took him out to Paul's Mall to see Muddy Waters play.

It was like me and Brad watching a guitar lesson every night. We'd watch this insanity go on and then have to follow it. To me, it wasn't headlining, it was following. Jeff knew it. A lot of people of his stature wouldn't have opened for us, but he did it that summer, twenty-six shows worth, mostly outdoors.

This was the height of the whole thing for us, and all I remember is how much fun we were having, all the good times we were living through, and how much we loved to play and get people off. It was really a huge rush.



Joe Perry with Jeff Beck, 1975
(PHOTO: RON POWNALL)

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3: Welcome, Shakespearean Players

Joe Perry: Back then we had one of the best road crews in the business, a bunch of guys who got to be semifamous on their own. Most of them got more girls than anyone in the band ever did. They called themselves the Country Club Crew.

Robert "NightBob" Czaykowski: In the early seventies, I was hanging around the scene in New York, playing a little, until I realized I could make more money working for bands than being in a band. So I opened a rehearsal hall on Grand Street in Soho, which is where I met the Dolls. A great band that nobody in the business got, because the audience had shifted to these younger kids who thought all the older acts were stodgy. Leber-Krebs were managing them and one day we saw these pictures of Aerosmith from Boston, supposedly a good band, but we thought they were ripping off the Dolls. I went to see Aerosmith play at Bananafish Park in Brooklyn and thought they were good. Nice people too.

A few years later, I'm working for IES, an English sound company that got hired to do Aerosmith's 1975 tour. So I come off an Emerson, Lake and Palmer tour and go up to Boston, where I set up monitors and a PA system at this Warehouse, and in comes Aerosmith. But they were really tense and I stayed one day and left because they had this manic perfectionism about the sound—stage monitors were a big issue—and I didn't want to deal with all the fighting. But it was either work with them or be fired, so I went back to mix their live show. This is the fall of '75. I did five shows with Scott Cushnie in the band, then he was gone.

We did all these way-out gigs at 10,000-seaters and 2,500-seaters, whatever they could get. The band's gear—two tons of PA, lighting, sound equipment—traveled in a forty-foot tractor trailer driven by Gil McNeil. We'd get to a town, set up this big rock show, the band would

**NightBob**

(PHOTO: RON POWNALL)

come in and have a bad sound check with much yelling. We'd set up a support band or two, have a bite to eat, put on a big rock show, pack it up, load out. No equalizer, no compressor, twenty-four channels of English-built mixing console, some power amps, crossovers, some boxes, speakers, and miles of wire. You moved and fixed this junk every day. Then on through the night, five hundred miles to the next gig, me and Dick Hansen and three lighting guys and three band crew guys, eight guys in the little blue van.

The band flew commercial or in a private plane by the end of the year. They were big on trashing dressing rooms, yelling, throwing food, demanding their money in hand before going onstage. There were constant caterer freak-outs because their contract rider specified turkey on the

used. Krebs freaked and screamed at Jann Wenner, but it did no good. Plus, they hated the story ["Aerosmith's Wrench Rock" by Ed McCormack], which portrayed them as a bunch of greasers. I thought I might get fired.

San Francisco: *The Cow Palace. Joey in black shirt, knicker-cut jeans, short socks, sneakers. There's a mini-riot when he starts throwing drumsticks to the fans during his solo as the band goes backstage for a rest and a line or two. Joe tells a reporter, "At least we don't return to the hotel during the solo, like some bands I could name."*

Seattle: *Edgewater Inn, seaside hotel where you can fish out the window. Scene of Led Zeppelin's famous dead-shark-and-groupie story. The band goes fishing for sharks. One is left propped up outside Steven's door all night. Aerosmith, Jeff Beck, Derringer, and Starz [an English knock-off of Kiss] sell out the Kingdome in ninety minutes.*

Boston: *Aerosmith wanted to play the local football stadium on the Bicentennial, July 4, 1976, but the town of Foxboro, where the stadium was located, refused to grant a permit because the last two Aerosmith gigs in Boston turned into riots. "Banned in Boston." The band passes on Boston Garden because of no air-conditioning, settles for three nights at the Music Hall later in the year.*

Maxanne Sartori: "Back in the Saddle" was my theme song on WBCN that summer, an incredible track with a lot of power on the radio. The whole *Rocks* album was like an explosion. A great album, and people were in awe of how cool Aerosmith was. I was living across the street from Joe and Elyssa in Brookline, but when they moved to their new house they got a lot more private. They changed around then, and you could tell they were getting too high. It was when Joe started using heroin. One night I went over to the new house and Elyssa was screaming, as only she could: "Goddamn it, Joe! I told you if you did that much you'd get sick and now I have to clean it up!" And there's Joe on hands and knees in the bathroom, almost in tears. I knew by his eyes what he was doing and it was pretty scary.

But did I say anything? Did I go, "Hey, as your friend, this is a dead end? You shouldn't do this?" No, I didn't. I wanted him to like me and was too proud of the friendship I had with him. You just couldn't talk to

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people about drugs in those days. If you tried to intervene, you were dead meat.

ROCK MAGAZINE

"Before, it was a struggle to keep alive," says Joe Perry. "Now it's more like a struggle to find a sound. We can keep playing the largest stadiums in the country, but we'd never be answering the question of our basic values. Our biggest struggle now is to make an artistic dent." (June 1976)

Los Angeles: *Dar Maghreb [a Moroccan restaurant] on Sunset. Steven and Diana at dinner with Liz and Rick Derringer. Sitting on cushions, smoking dope, getting drowsy. Steven converts the lamb appetizer to spitballs, which soon stain the white stucco walls. Asked to leave.*

Anaheim: *56,000 kids in the stadium tonight, September 10, 1976. Joe Perry's twenty-sixth birthday. He drinks a bottle of Dom Pérignon in the dressing room before the show. Kelly comes in and bellows, "You fuckers ready to rock 'n' roll?" During the show, Elyssa prevails on Jeff Beck to join Aerosmith on the encores as a birthday surprise for Joe. Beck strolls onstage halfway into "Train" and then does "I Ain't Got You." Joe ecstatic at Elyssa's surprise present, as Beck rarely jams with anyone. (Beck in a good mood because he'd just been given his second gold album, for Wired.) Joe listening to the tape afterward in the dressing room, jumping up and down. It was the first time many in the road crew had ever seen Joe smile.*

Terry Hamilton: *We all went to Hawaii around that time and had a lot of fun. Steven and Diana camped out on their balcony, living outside on mattresses and blankets. David Krebs rented a huge boat for diving trips, which of course was the only time we really saw the sunshine. Tom and I ate some 'shrooms and tripped out on our own balcony.*

Liz Derringer: *Rick was opening for Aerosmith and had a hit record with "Frankenstein," so we were all riding high. Things were so silly then. We'd be in Joe and Elyssa's suite and there'd be five trays of room service, untouched, because we were doing too much coke to eat. I remember Rick pouring a big mound on a mirror—we were on the terrace of Joe's suite at the Kahala Hilton—and chopping it in a perfect spiral,*

enough for four or five people. Steven Tyler walks in while Rick's in the bathroom and goes, "For me? You shouldn't have," and snorts the whole thing.

NightBob: We finished that tour outdoors on the West Coast, huge gigs, semi after semi after semi of PA, and it wasn't enough! The gigs got too big—110,000 indoors at the Kingdome in Seattle—and it became a joke. It was stupid, with kids half a mile from the stage, the band insulated from them, no contact at all.

Los Angeles: *At the last minute, Joe and Elyssa and Steven and Diana decide to attend the Don Kirshner Rock Awards TV broadcast, because Aerosmith has been nominated for Best New Group, which they think is pretty funny. Bored out of their minds (except when watching Jeff Beck's band writhe in mock agony during Rod Stewart's big number) they leave after Hall and Oates wins Best New Group. "Sounds like a cereal," Elyssa complains.*

The Perrys head for New York, where Joe will play on David Johansen's debut solo album. Steven repairs to a beach house in Malibu owned by the guy who leases jet aircraft to rock stars. The house is equipped with one-way mirrors so guests can watch the sex shows the owner likes to put on. Another guest, Mick Jagger, tells Steven Tyler, tongue in cheek, about the Stones' plans to hang parachutes around the halls of their next tour to get a better sound. Steven bothers NightBob about this for the next year.

Steven then flies to Boston, where he's met at Logan Airport by Harold Buker, Sr., Zunk's father, former campaign pilot for Jack Kennedy and now commander-in-chief of the Aeroforce, the band's flight wing. Light rain as Buker murmurs into the radio and the twin-engine, six-seat Cessna Citation clears the runway and heads north over the flaming golden carpet of New England in September to Sunapee, where Steven is living in a rented house on the lake while waiting for his new house, a former steamboat landing and yacht club, to be renovated. Exhausted after four months on the road, he dozes until Mount Kearsarge looms into view and the plane begins to fall into a steep bank as it approached Eagle's Nest, the Bukers' private airstrip in New London. Diana is there to meet him in his own red Porsche.

Steven Tyler: It was one of those houses I'd see when I was a kid driving around the lake in a little putt-putt boat that kids could

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rent down in the harbor. It was on Lovers' Point; it had a boathouse, a boardwalk, wooden stairs leading up the house. I'd admired this place for years, and I heard it was for sale and I had some money for the first time. "Seventy-five thousand? Yeah, I'll do it." I had this friend, a Vietnam vet who would bring up needles and coke to the house and we'd shoot coke all night. I'd get so high that the downstairs of the house always looked distorted to me, like it was elongated. When I finally got sober, I had to have the whole house gutted and rebuilt to get it out of my past.

5: Playmate of the Month

Steven Tyler: Diana and I had been carrying on for a couple of years, and it was beautiful until the drug thing got out of hand. We were living in an apartment on Beacon Street. Francine, who did our clothes, lived in the basement. I knew something was wrong when I'd stash an eighth of cocaine in the walls, something I was saving for when I got off the road, and I'd get home and it would be gone. Same with money and the bank accounts. Diana had lost her childhood and I lost my mind. The drugs were so heavy I don't even remember very much except that I was out on the road and Raymond called and said, "Steven, there was a fire." I got back and Diana was in the hospital with smoke inhalation and burns on her hands. I went to the apartment and everything was black three feet above the floor. The fire marshall said he'd never seen such thick smoke. She rolled out of bed and somehow crawled out of it.

Ray Tabano: Diana was too young. When he went on the road, he'd say, "Ray, make sure you keep an eye on her." Because the apartment would get ripped off and bad shit would go down. I went over one day to dole a little coke out to her and a half hour later I get a call that the street is full of fire engines. I told Steven to get rid of her after she burned his fuckin' house down, but she was pregnant and he still wanted to be with her. Fuckin' guy wore her dresses, for Chrissakes! I said, "Steven, if she has this fuckin' baby, you're gonna be stuck with this girl for life. C'mon, man, do the smart thing." So they had the abortion, and it really

messed Steven up because it was a boy. He was there, he saw the whole thing, and it fucked him up big time.

Steven Tyler: It was a big crisis. It's a major thing when you're growing something with a woman, but they convinced us Diana was too young and it would never work out and would ruin our lives. They said, "Will you do it?" And we said, "Yeah, let's do it." You go to the doctors and they put the needle in her belly and they squeeze the stuff in and you watch. And it comes out dead. I was pretty devastated. In my mind, I'm going, *Jesus, what have I done?*

So if there's a heaven and hell, I definitely have a little hell to go through. My conscience would still be tormenting me if it weren't for the therapist who said, "Listen, your sense of moral responsibility is lessened when you're out of your mind on drugs the way you were." I went, *Wow, thank God*. But I don't wanna kid anybody, because it affected me later when I tried to get my real wife pregnant. I was afraid. I thought we'd give birth to a six-headed cow because of what I'd done with other women. The real-life guilt was very traumatic for me. Still hurts.

And that was it for me and Diana after three years.

I had a girlfriend around this time named Carole Miller, a disc jockey who liked to make love with her boots on. She'd been to law school and was really intelligent. People on the tour like Laura Kaufman said she was a big improvement over Diana because you could have a conversation with her. Then my path crossed with Bebe Buell, a big blonde with huge breasts who I'd seen in *Playboy*. I went out with her for such a short time—we're talking a couple of months—but our thing had some extremely heavy-duty life implications for both Bebe and me.

Bebe Buell: I was living on Horatio Street in New York with Todd Rundgren when I met Steven. I had come to the city as an eighteen-year-old model in 1972, making the rounds, signing with Elaine Ford's agency. A photographer, Lynn Goldsmith, took some nude pictures of me, which is how I wound up in *Playboy* [in November 1974]. After I saw some copies of *Penthouse*, I decided *Playboy* was more wholesome, but appearing there also tagged me for life. It was like being Miss America, but you take a lot more flak.

I actually met Steven in late 1973 when Aerosmith was looking for a producer [for *Get Your Wings*], and Todd and I flew up to Boston in the rain, thinking he might take the job. It was at a muddy outdoor gig. I was

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in a white dress and espadrilles and Todd was being unhelpful and yelling at me not to be a pussy and Steven overheard this. Suddenly he leaps over and carries me across this muddy field in front of everyone. Todd was not amused by this conspicuous act of gallantry.

Back then we lived the full seventies lifestyle. Fidelity wasn't a big thing, and relationships tended to be progressive, much more open. It didn't mean you didn't love your mate, but the person you kept house with might not necessarily be the one you traveled around the world with or had sex with. Todd was my mad scientist boyfriend, my anchor, who lived in recording studios under a pair of headphones, while I was a young wildcat who needed to live out all my fantasies. I was young, pretty, and lucky to hang out with boyfriends like Mick Jagger and Jimmy Page. When my flings were over, Todd was at home and I always ran back to him.

I met Steven again in 1976 when I was in L.A. and Liz Derringer took me to the CBS convention, where they presented Aerosmith with three platinum albums with lots of speeches and pictures. When Steven saw me, he said, "You again? It's not rainin' tonight, baby!" We both laughed because we were the only two people at the CBS convention dressed in leopard. He was with Diana, a young, very pretty girl. But they were on the rocks and arguing, which I'm picking up because I'm digging Steven. He was really cute, and Todd was on the road having seventy-five affairs, and the downside of this seventies lifestyle was that it could become a contest to see who could hurt the other person the most. Very unhealthy for everyone.

A month later, Derringer is opening for Aerosmith in Philadelphia and Liz calls up and says, "Let's go. You can see Steven again." That was the night things changed. After the show, Steven and I talked and flirted in his room, spent some time alone, didn't even get to kiss because Liz was going, "You can't stay. Get in the car." It was like she dragged the dogs apart before they got into it. Then Steven started calling me from the road. That's how we fell into this very passionate love affair.

One night I was in bed with Todd on Horatio Street and Steven called me at 4 A.M. He was in New York and he wanted to see me. I told him I had to go to the dentist that morning, which is where Steven found me. He was sitting in the waiting room when I was done, and we spent the rest of the day together. Very late that night he called me from a hotel—where he was alone and overwhelmed from too much cocaine—asking me to come and rescue him. So I went and got him and took him to Liz's house. The Derringers gave us their bed and went off to sleep downstairs.

We stayed there until we got on Steven's private plane and flew up

to Sunapee, where we spent a few extremely romantic days in Steven's guest house while his new house was being remodeled. We went to flea markets, spent time with Henry and Gail Smith, went out on the boat, and it was just a beautiful fall season. He took me way into the woods behind his family's resort in his uncle's old jeep and we got stuck in a swamp and had to walk out for hours. Then we dried out in front of a big fire and drank wine until the morning. We were together almost every minute and it was just a real ride, if you know what I mean.

Then we flew to Boston and went to Steven's carriage house in Brookline. Diana was there, although she wasn't supposed to be, and she and Steven fought all night and then she left. Steven and I dove right in to this deep sexual trance, very heady and moving, and this is when I got pregnant. It was late September 1976.

Back in New York, I told Todd that I was going on Aerosmith's European tour with Steven. He looked at me, shook his head, and said, "Don't come home." Then back to Boston, and many suicidal calls from poor Diana as they were breaking up. It was actually a pretty sad time. The following day we left for London.

Steven Tyler: Aerosmith's first European tour began October 13 in Liverpool (where we visited the Cavern, shrine of early Beatles days), and then did seventeen shows in twenty-one days, London, Paris, the whole deal. We may have been huge in America, but in Europe they didn't wanna know. Our first album had sold 900 copies in England and the shows just weren't selling. We didn't want to get our heads chopped off in the English press, so the promoter took out ads that said: HEY, BRITAIN, WAKE UP! THIS IS AMERICA'S GREATEST ROCK 'N' ROLL BAND! Pretty lame, but at least we didn't look bad when we got to London. The tour was hell, everything disorganized and screwed up, especially the publicity. One review of our London show said I handled the microphone like a Hoovering *au pair*.

In Germany, I tried to get through major fuckin' customs with this big buxom blonde who'd been in *Playboy* and a hash coffin in my pocket. I got off the plane, really stoned, and something was out of order with the passport. "Stand ober here, pliss!" *Oh shit*. They went through our pockets and our bags. The guy opens the coffin and there's a little hash powder, enough for one hit. "Vot iss dis?" "Huh?" "Dis! Vot iss dis?" He holds the hash out, so I blew the powder in his face.

And they fuckin' went apeshit. They brought the *dogs* out. They brought a woman out to strip-search Bebe. They took me in the back room to look up my butthole. They put some chemical shit in my hash coffin

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A stroll through a European airport, 1976

(PHOTO: RON POWNALL)

and it turned blue. So they arrested me. They found Bebe's birth control pills and arrested her for drugs. The promoter came in and said, "Look, he's gotta play tonight or there'll be a riot. We'll get him out of the country afterward." We ended up paying some ridiculous amount of money so I could stay and work.

It was raining in Germany and the whole tour was a mudbath. They got us some Wellington boots and we tried to make the best of it. It turned out that LEBER-KREBS, which was stenciled all over our gear, meant "liver cancer" in German and some of the local crews were afraid to handle them. We rented nine big Mercedes sedans, but only four got returned

untotaled. Henry Smith got in an accident at 100 miles per hour on the Autobahn. He walked away, but the car was fuh-ucked.

MELODY MAKER

Aerosmith are a remarkable band, the first American group to successfully adopt the stances of those English bands that have successfully dominated world markets for a decade. Led Zeppelin, Yes, ELP [Emerson, Lake and Palmer], and Queen have climbed from obscurity to fame and riches. It could only be a matter of time before America would strike back.

... But the critics' assault on Aerosmith did not sway the fans. As the band slogged around endless tours, opening for many a British act, they gradually built a following. After four years, they have become a record-smashing band—at home. They remain virtually unknown in the land that provided them with so much inspiration. (October 1976)

Bebe Buell: Aerosmith wasn't a big band in England and there was a little backlash against them after they closed their Hammersmith Odeon show with "Helter Skelter" and they were accused of ripping off the Beatles, as absurd as that sounds. We went to see Paul McCartney's band Wings play at Wembley and Steven was impressed that I knew Paul and Linda and the guys in Queen and all the English musicians I'd met on the road. There were a lot of laughs and funny times, like Steven getting devoured by a crowd of young girls in Sweden.

There was also a lot of tension because Joe's wife Elyssa hated me from the minute she saw me. She was a real witch and told a lot of lies about me. This made Joe Perry very leery of me being around. He thought I had too many boyfriends and that I'd hurt Steven. Joe is old-fashioned and protective. He came up to me early on and said, "Listen, Bebe, don't hurt Steven or you're not gonna come out of it smelling like a rose." The whole scene was also complicated by Cyrinda Foxe, wife of David Johansen, who was Joe Perry's best friend. Cyrinda had been part of the Warhol scene and was in *Andy Warhol's Bad*. I could tell that Cyrinda secretly liked Joe, but she was Elyssa's best friend, so that was pretty weird.

Joey Kramer didn't trust me either. He and Steven would stay up all night doing coke together. They'd go to bed at dawn, just as I was getting up, so I didn't even see that much of Steven. That's when I started to get Steven's scary side. He was really crazy in Europe, totally drunk, really

It started with the isolation of the road. Look at the situation from a thousand feet up. Take the roof off the hotel and look down at the cross section. You see Steven alone in his room and you say, "Wow, you could throw just about anybody in there and this fuckin' guy would go crazy. He's isolated, doing drugs, out of his mind."

And she's not just anybody. Cyrinda was a character from heaven. Gorgeous and glamorous. She took that Marilyn Monroe spin and had it nailed down.

You have to understand something. When I got the band together, I had drugs and I shared them with Joe because it was a good way to get close to him. Then I couldn't get near Joe because he was always with this beautiful Elyssa, who was doing heroin with him. She was keeping him away from me. I couldn't even *talk* to him. There was major jealousy because Cyrinda was their heroin connection and Elyssa didn't want me getting the drugs first.

I'm in the hotel, spinning my wheels, ready to go, and here's this stunning *fox* on tour with us. Suddenly, in the world of Aerosmith, of road managers, the plane, these two people saw their chance to get laid and took it. I started to act out with this girl, big time.

I'm like, "Mmmeeeoowwww. Mmmeeeoowwww" outside her hotel room. Joe and Elyssa bring her on the road and I'm literally rubbing on her doorpost and yowling like a cat. "Rrreeooww. Meeoowwww." I was really doing that, out of my fucking mind.

Rabbit: Cyrinda and I were in Joe's suite at the Plaza Hotel [in New York]. And Steven's nuts about her. At 3 A.M., Steven's pounding on the door of Joe and Elyssa's room and yelling, "Cyrinda! I love you!"

She turned to me and said, "I'm gonna take him for everything he's got." She just flat-out said that.

Steven Tyler: "YYYeeeoowww! C'mon! Lemme in! Please!" And she goes, "You're not gettin' any of this, honey." She just played me to the max. She fuckin' knew how, man. And I really fell for her.

Laura Kaufman: It had started on the road, in Phoenix or Denver, with David there. Then I'm backstage at the Nassau Coliseum on Long Island and I see Cyrinda and say, "Hi! Where's David?"

"Laura, I need to tell ya something. I'm with Steven now." I was shocked and walked away. Later she called me up. "Laura, listen, will you please call David for me and tell him . . . I'm not coming home?"

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It was the last time Elyssa spoke to Cyrinda. Everybody paired off and didn't hang out together anymore. They wouldn't ride in the same limo together. Nobody around this could look at it and feel comfortable. People blamed Elyssa when Joe left Aerosmith a year later, but believe me, this didn't help.

Steven Tyler: There isn't a girl, from Diana to Bebe to Cyrinda to Dory, that I don't still feel for. There's a part of me that loves every one of them equally as much. I loved them. I lived with them. When I moved in with a girl, I bonded with her, living inside each other's head until it's mystical. When we make love, the gods come out. I'm in there, a sea of lubricity, sharing a thing that gods do. Normal people didn't fuck like that. They don't touch and smell and taste and lick and feel everything like we did.

So I went off with Cyrinda. I took her to my house in New Hampshire, she got pregnant that spring [1978] and we got married in Sunapee in September and had a baby girl, Mia Abigail, on December 22. It was Christmastime. I was there, helped deliver her, and it was great. Then what do you do with a baby when you're a rock 'n' roll guy? You spend some time with the baby, then you go back on the road.

Bebe Buell: Cyrinda told me and Liz that she was tired of living poor with David on the Lower East Side. It was like, "This guy has money and drugs!" She liked that stuff that begins with an H. He was more into Tuinals. I don't think he began to dabble seriously with that stuff until he met her. Anyway, she dumped David and even took the dog.

Rabbit: David Johansen wrote a song about her leaving him, a very sad song called "Flamingo Road."

Liz Derringer: Cyrinda married Steven and changed. She became a person I didn't know. She was a big New York star who became an "old lady" and disappeared. She went to Steven's house in New Hampshire and stayed there for twelve years.

Spilt Milk

I was in seventh grade and just going through the whole 1978 music thing that was happening for kids—which was like Cheap Trick and the Cars. Anyway, there was this chick that I was going after that was considerably older than me, and she was pretty hot. And I'd been trying to be cool enough to take her out and have my way with her at some point. This went on for months. Finally I sort of weaseled my way into her apartment. So we're hanging out and she put *Rocks* by Aerosmith on, and I was mesmerized by it. It was like the be-all-and-end-all, best attitude fuckin' hard rock record. This was before I had started to play guitar . . . I'd grown up with music, but this was like *my* record. I must have listened to it about half a dozen times, completely ignored her, and



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then got on my bike and rode. I was totally *in there*, I was at least gonna get a decent french kiss out of it, and I completely dropped the ball for Aerosmith, and that was that. It's probably one of the records that sums up my taste in hard rock bands to this day. Meanwhile, she's out there somewhere and I missed it. But it was worth it. That was the record that changed my life.

-Slash, Guns N' Roses

1: Coliseum Rock

Joe Perry: Going crazy, needed a break, gotta get away. George Martin, producer of the Beatles, told me he was building a recording studio on the Caribbean island of Montserrat, so in February [1978], Elyssa and I flew down to check the place out and dry out for two weeks.

We went down with the best intentions. George took us out to a pasture with a tree in it and showed us where the studio would go. [The studio, AIR Montserrat, was destroyed in a 1994 hurricane after a distinguished career.] Meanwhile, I've snorted my last grain and am dope-sick and on the edge of my seat all the time. I couldn't wait to get out of there. We got home the night before the Blizzard of '78, which we spent socked in with enough heroin and cocaine so we didn't have to leave the house for a week.

My mantra used to be: "Let's do all the drugs in the drawer."

David Krebs: In 1978, Aerosmith represented the living spirit of American rock 'n' roll. To see them destroy themselves through immense disregard for anything but self-indulgence was a tragedy.

I didn't become a manager to be a doctor. If you wanna be a doctor, be a doctor.

Tim Collins was a great doctor. Without him, you'd have no Aerosmith today.

But back then the drugs had reached the point of undermining everything. Everything.

In 1977, we had reached the top, but the band was dying, so we switched from a running game to a passing game. By the end of that year, I knew I had problems. My idea was that I wanted to build a roof over their heads, to give them time to work out their problems. We came up with these giant events—Cal Jam, Texxas Jam—that would make so much money it would give them running room to deal with these problems.

Aerosmith headlined, always supported by Ted Nugent, who we put on the road with Aerosmith in 1975 and broke wide open. That's how they spent most of the year, headlining ten major outdoor festivals. I felt there was a certain mystique if you're a teenager and I bring you into a 60,000-seat stadium. You see a six-act dynamite rock show that ends with Aerosmith onstage and fireworks after. If you're a fifteen-year-old kid in 1978, very impressionable, this will go down as your most exciting experience. It was very fascistic, the whole coliseum rock thing, but it sold a lot of albums for Aerosmith and Ted Nugent.

Rabbit: Aerosmith decided that they were too removed from their audience, so during March and April they played a mini-tour of smaller theaters—the Aragon in Chicago, the Music Hall in Boston, the Masonic Temple in Detroit—as a kind of reaction to the punk idea that big bands were totally irrelevant. They hired Mark Radice, a young math whiz, to play keyboards and sing along with Steven.

They played the Cal Jam thing in the middle of this tour. [Cal Jam II, held at Ontario Motor Speedway, 60 miles east of Los Angeles, on March 18, 1978, was the biggest rock festival of the late seventies. 350,000 kids paid to hear Aerosmith, Ted Nugent, Foreigner, Heart, Santana, Dave Mason, Bob Welch, and Mahogany Rush. The *Los Angeles Times* reported the next day that 700 people were treated for angel dust overdoses. There were also two robberies, a rape, a stabbing, and countless looted cars. But no deaths.] I remember that Steven ran out of cocaine before the show and sent one of the roadies back to Boston on the Learjet to get some, telling the poor guy he was going to pick up some music that had been left behind. Also Aerosmith got pissed off at Nugent because Ted was late coming back from Africa and would probably close the show.

way this band looks and sounds right now. This group just looks
tit!" (December 1982)

Steven Tyler: Jimmy Crespo was an artist. The Dufe drove him crazy because he purposely played fucked up to be like his idol Ronnie Wood. Rick was Ronnie Wood, standing there onstage with a cigarette dangling out of his mouth, copping that fuck-all attitude that Ronnie did so well.

Tom Hamilton: He did it really good though. He had this Fender guitar that didn't have enough of a cutaway, so he took a hatchet and chopped it out and just left it like that.

Joey Kramer: Dufay didn't give a shit because for him it was all an image thing. Rick would fix his hair onstage, his guitar just hanging there loose and ringing, while Jimmy's playing his fuckin' heart out. It drove Jimmy to drugs.

Steven Tyler: So many times I fired him, threw him outta the band. "You're fired! Get the fuck outta here!!"

Tom Hamilton: But he knew how to come back because in the end, Rick has a really big heart. He knew how to win you back.

Jack Douglas: Rick would not leave Steven alone because Steven was fucked up royally. He was dead onstage, lifeless, catatonic. One of the greatest, funniest movers in rock, but he wouldn't move. Rick didn't have a debilitating drug problem—maybe a few pills, some coke—and he wanted to literally kick some life into Steven, upstage him. They would chase each other around the stage. Steven couldn't believe it. It was like a rite of destruction. When Steven tried to fake a few steps, Rick would trip him.

The band tolerated it. Rick was doing it because he was a fan of Steven's. Joe and Brad were gone, and Tom was no extrovert. Jimmy Crespo wasn't confident enough to take a starring role. He was just trying to play Joe's leads and didn't know what else to do. He was scared shitless the rest of the time. Would he even have a job the next day?

Rock in a Hard Place: What an apropos title.

Walk This Way



Rock in a Hard Place; Rick Dufay on his back
(PHOTO: RON POWNALL)

7: Are There Any More at Home Like You?

Teresa Tyler: My [identical] twin sister Lisa was going to Maui after we got out of high school in Tulsa [Oklahoma, in 1975], and I went along to keep an eye on her. So I was working at René's in



Teresa Tyler
(PHOTO: GEORGE CHIN)

Lahaina in 1976 when Steven Tyler came in with Diana and an entourage. I joined the party and went with them down to Nick's Fish Market, where Lisa worked, the only place to party in Lahaina. That was the first time I met him.

Maui then: small, safe, quiet, only a few older hotels, one condo. Too quiet, so we moved to Honolulu, my sister and me. I kept running into Steven—several times over the next few years—like something was trying to bring us together in some funny way. Then Lisa and I moved to New York City. One night I got invited to a benefit dinner at the Waldorf for the T. J. Martell Foundation, and Steven was there with Cyrinda.

Then Lisa met Brimstone and started hanging out with him at Steven's

Walk This Way

apartment. Brim had lots of drugs and was generous, but he was all over Lisa all the time. I guess Steven realized Brim was trying to make a move on her, so he said to Lisa, "Are there any more at home like you?" She laughed and told him she had an identical twin sister.

A week later—it was May 4, 1982—I went with Lisa to the studio where Aerosmith was recording after doing some of their record in Florida. We got there around 5 A.M., then Lisa left and I stayed with Brim. Steven finally came out to the waiting area as I was about to leave, but he asked me to stay and I did. (And we've been together ever since.)

I waited and Steven came out at noon. He took two hours to pick up his stuff, we kissed for two more hours in a doorway while waiting for a cab, and then I went with him to this apartment where he was living with Rick Dufay. Steven told me he was separated from Cyrinda, who was in St. Martin.

And we just . . . fell. We stayed in the apartment for a couple of days, getting high, talking. Steven had a box of tropical oils and creams from Florida that we played with, smelled, tried out on each other. We didn't have sex because we finally lay back and passed out on the bed with our feet still on the floor. When we woke up, we couldn't walk.

He had to go back to the studio and he put me in a taxi. I met him there later on and we just kissed for hours. I don't remember much about it. The whole week was so like a dream. We went back to the apartment, went to sleep, woke up, and made love.

Around this time both our leases were up. I packed up my apartment, then his. We stored our stuff in Private's and moved into the Milford Plaza on Eighth Avenue for a month. I remember Steven had this dream. He woke up and began singing as if he wrote it in his sleep. It turned into the song "Joanie's Butterfly." I started making him clothes, which is what I did. The first was a silk unicorn jacket. Then he went on the road and we moved to the Mayflower in the fall of '82.

Steven loved his wife, he loved his daughter. He has a very strong sense of family. I never once thought of stealing him away to be my man. But the two of them fought like cats and dogs and he didn't want to be around her—she was off living in another apartment. I'd encourage him to go see her, but he always came back to me. He didn't want to hurt her—Mia was only three—and he'd make me hide behind the refrigerator when Cyrinda came to see him at the Mayflower. It was humiliating and I was pissed off. At the

time, Cyrinda was having an affair with one of the studio engineers [Godfrey Diamond], but I could tell he still loved her. It was hard for me, because now I loved him.

Steven could be really mean when he got high—yelling at me and stuff. But when he wasn't so high he'd be Steven Tallarico, and that was who I fell in love with, not this mean Tyler person—overwhelmed by drugs, ego, pressure, stress, all that.

When the tour was over, Steven went into rehab at the Hazelden Clinic. I went to see him and once he made me bring him one of those little bottles of booze from the airplane. He drank it and nearly died from the guilt.

Then we moved to the Gorham Hotel in New York. *Rock in a Hard Place* hadn't gone anywhere, the band wasn't happening, and it was quiet. David Krebs was giving Steven \$20 a day and we wound up watching TV, going out to eat. We were a real couple and he was able to breathe for the first time. There was very little work, maybe a couple of videos. That was it.

I think of that period with a lot of fondness because he was a normal guy, not famous, no autographs, no hassles. He took me up to Sunapee to see his house and meet his parents. I can't describe how romantic the lake looked and felt as he paddled me around in his canoe—so peaceful and beautiful. Then Cyrinda went up and stayed for the next eight years.

At the Gorham one day [in 1983], Steven called Joe Perry and they spoke. Steven had never talked about Joe with me or about wanting to get the band together. As far as I knew, Steven really liked Jimmy Crespo. One night when we were in Cleveland, Lisa and I went to see Joe backstage after one of his gigs, and he was nasty to us. So at first I didn't think the chances were too great of them getting back together.

8: What Am I Getting Into?

Joe Perry: The Project worked again in the fall of '81. We had a road manager named Doc McGrath, who worked for Don Law, and Doc kept telling me about this guy named Tim Collins, a young booking agent in Boston. "Don Law isn't doing shit for you," he'd tell me. I was willing to try anything. I'd lost my record deal with Columbia and couldn't afford to keep

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OF AEROSMITH

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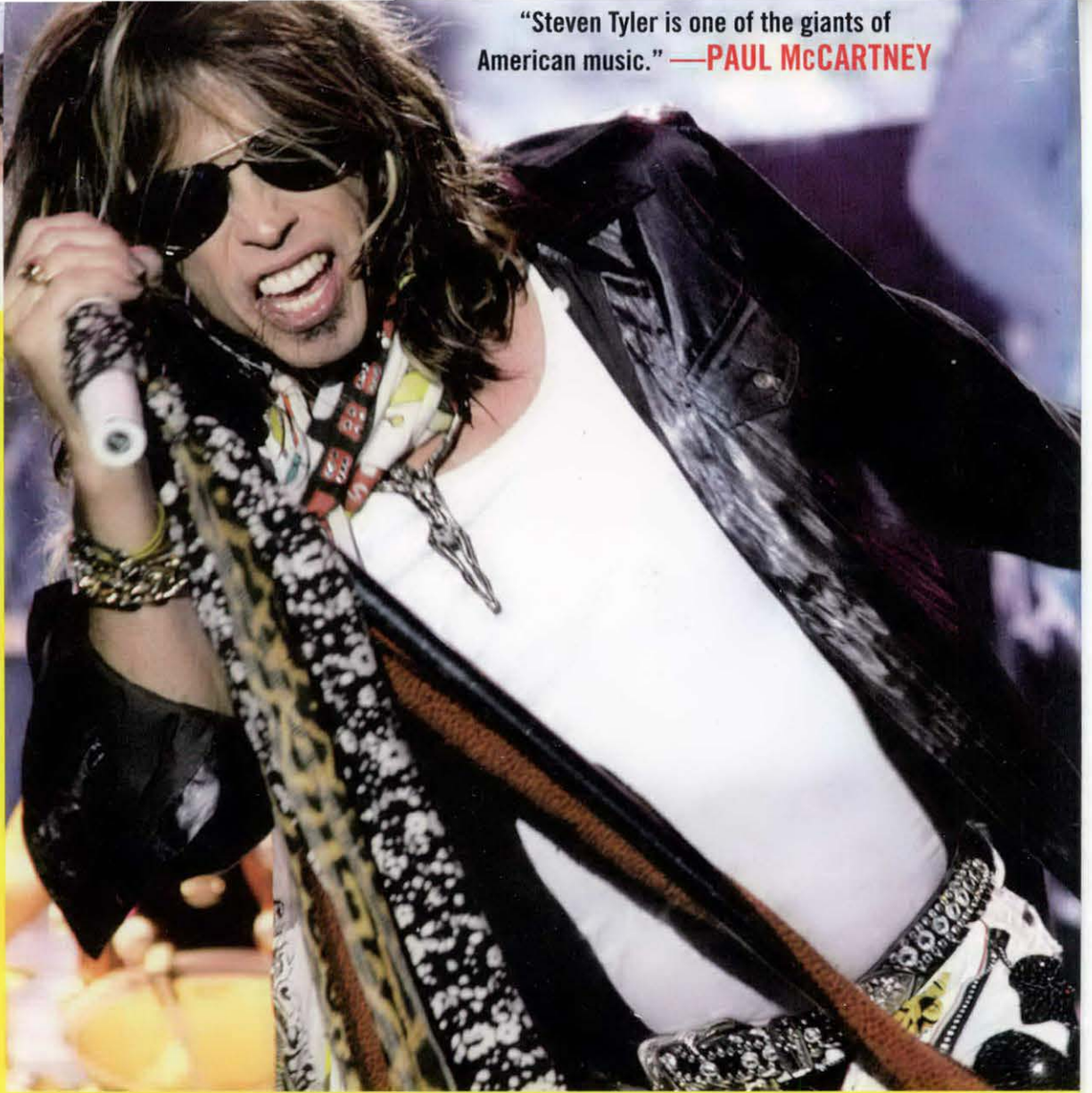
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"Steven Tyler is one of the giants of American music." —PAUL McCARTNEY



STEVEN TYLER

STEVEN TYLER

DOES THE NOISE
IN MY HEAD
BOTHER YOU?

DOES THE NOISE IN MY HEAD BOTHER YOU?

A ROCK 'N' ROLL MEMOIR



**"THERE WAS A GAP OUT THERE
IN THE ZIT-POCKED HEART OF THE
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THE OLD ROCK STAR MANUAL:
WRETCHED EXCESS IN DANDIFIED DUDS."**

—STEVEN TYLER

DOES THE NOISE
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BOTHER YOU?

A ROCK 'N' ROLL MEMOIR

STEVEN TYLER

WITH DAVID DALTON

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*To the loving memory and the spirit of
Susan Rey Blanca Tallarico*

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DOES THE NOISE

IN MY HEAD

BOTHER YOU?

CHAPTER SIX

LITTLE BO PEEP,
THE GLITTER QUEEN,
AND THE GIRL IN
THE YELLOW CORVETTE

Did women get backstage and offer themselves to us on our altar of lust? Take off their clothes, do tricks, satisfy our aching needs? Not in the beginning. Stuff like that doesn't happen on a regular basis until you become really, really famous. But still, were there ass-shakin' trollops in the audience who defined our existence and made our minds go into Glory Hallelujah mode? Absafuckinlootley! Hell, that's what it's all about!

Now, I'm not saying these girls didn't come backstage after performances—of course they did. Isn't that why they showed up to begin with? Music was one thing, but *my* thing was the other. I'd run back and get Kelly . . .

“Kelly—the girl with the red dress in the front row—have her shaved and oiled and brought to my tent!” And she’d be there. As dirty as my mind is, my body’s pretty clean. Kelly always made sure the girls were in the shower when I got in the room. I liked my pulchritude pristine! I can’t kiss a girl that’s been stage diving with five hundred other guys. I’m very oral and I like clean. Back then, sure, you could’ve gotten gonorrhea, but with one shot of penicillin . . . see ya. Unlike today, STDs were a dime store a dozen in those days. How do you avoid ’em? Screw ’em through Saran Wrap? Nah, if they washed, they were clean. As someone once said, “You ain’t seen nuthin’ till you’re down on a muffin”—and I’m no different.

After we became more famous, girls began coming backstage without having to be coaxed. Soon they started getting inventive, printing their own backstage passes for the price of a little backstage ass!

But early on, there were no girls doing backflips, no limos, no private jets—just the occasional girlfriend of a band member who acted like the only thing they ever blew out was their hair. Of course, there were other pleasures of the road. Like . . . the girl in the yellow Corvette.

Rewind to the summer of 1972 when we used to drive to our gigs in this truck that Mark Lehman owned, our original roadie and road manager all wrapped up in one. These days it’s probably moldering in the woods with vines growing through it. Anyway, that’s how we got to the gigs in the early days. And who wants to ride in a fucking van with the guys in the band? Sure, it’s okay to ride together when you’re on your way from Connecticut to New York to do a show. That’s a mere two hours, you’re all in the van together, and you’re psyched. You’re getting buzzed from breathing in the “eau de low tide” of the night before mixed with the sweet smell of sensimilla, stale cigarettes, and flat beer. To this day, it’s an aphrodisiac like no other to me. But the long, endless road trips in that van with guys farting, telling lame jokes, pissing in pop bottles . . . that was murder.

Somewhere in the grain belt between Indianapolis down to who knows where, I fell asleep on the top of the amps in the back of the van with my head staring out the window and my mind on Mars. I woke as the wheels rolled over half a deer that'd been sliced in two the night before by a semi. We were doing fifty-five in our International Harvester truck, christened the Good Ship Aerosmith, when I spied something yellow—it looked like a giant sour lemon drop—moving in retrograde in the next lane. My curiosity was instantly tweaked. I shouted to the driver, “Mark, slow down, and let that car we just passed catch up to us!”

Suddenly, I'm staring at a yellow Corvette bearing a blonde with gigantic orbs and a smile from heaven. I crawled up over the top of the amps like an infantryman on the beach at Iwo Jima and landed on Joe's lap in the front seat. Joe goes, “What the fuck are you doing, Tyler?” “I'm just lookin' for a kiss,” I say. “You ain't gettin' that from me,” said Joe. “That's not what you said last night,” I quipped. You can't ever really get back at a guitar player. They'll just crank their amp up to a million and drown you out.

She worked at the motel we'd stayed at the night before and was out on the highway doing a bit of her own randy reconnaissance. You can't always get what you want, but she knew if she tried hard enough she could get her heart's desire—and that was lucky me! She took me to a room and fucked my brains out. It was like three in the morning and she rolls over and caresses my back. What, *again*? Oh, baby, I thought, but what I said was “You know what? I could do this all night *and* the next day but I gotta get up really early to catch this goddamn flight.”

“Well we can take my Corvette,” she says. “And tell ya what . . . I'll sit on your lap and grind you till the middle of next week or you can ride my face all the way to Chicago or wherever the hell we're going!” It didn't matter. Time becomes meaningless in the face of creativity. Was I dreaming? Or the luckiest guy on earth? “That sounds okay to me,” I said with all the casualness I could muster.

“But first,” she says, “I gotta go back home for a few minutes to put out some feed for the horses.” Oh yeah, I’m not in New York anymore. I end up back at her house, riding horses bareback all night, naked. Right out of a storybook. Is this really happening? Am I dreaming, or am I being dreamed? Around 5:00 A.M., she says, “Put your clothes on, we’re going. What the hell, I wanted to see the show anyway.” If this ain’t something I already put in a song, it sure as hell’s gonna be.

Well, the next gig was in Davenport, Iowa, and damned if we didn’t drive that little Corvette all the way. Four beautiful hours, with mysterious fields of corn flashing by, rusty old gas stations, grain elevators, clapboard churches—and the sun’s coming up.

Two months later, she’s still on tour with me. The guys in the band, of course, are royally pissed. Why wouldn’t they be? They’re up there reading their in-flight magazines, drooling stewardess dreams, while I’m out there getting my kicks on Route 66. I swear to god—or General Motors—I never traveled so sweetly . . . to this day.

I only wish we were on the radio right now, or on *Oprah*. I would say, “If you’re out there, please call this number. I want to know how you are, what you’re doing, and what you look like now!” Of course, sometimes you don’t wanna know. You’d rather remember them the way they were—the way we all were.

Later on, when fame comes, things change. We’re in all the pop magazines and gossip columns, we’re fuckin celebrities, and we’ve got an impressive entourage of haute coke dealers and purveyors of other things for the discerning drug addict. Everybody wants to be my baby, everyone wants to kiss my ass.

“But isn’t that what you always wanted, Steven?” my guardian angel in a pink bustier asks. Hell yeah, baby. Whatever you say.

But Fame is a bitch. You’ve probably heard that somewhere, but only because it’s goddamn true. It’s a riderless horse, it’s a two-headed dog sniffing its own butt, a one-eyed cat peeking in a seafood store. And . . . it’s the absolute greatest generator

of creative fiction there is. You make it up, then *they* make it up. And as soon as you get well known enough for people to want to make stuff up about you, they will. It's not up to you anymore; the demon is on the loose. Everybody you work with, buy a car from, hire as a babysitter; everyone who fixes your computer. Each becomes, overnight, a writer of short stories, a chronicler of mouth-watering scandal.

Remember who we're talking about! Famous people. Why, they're capable of almost anything you can imagine. They're degenerate, ruthless, heartless, and disgusting, so pile it on. Anyone who's worked for Paul McCartney, believe me, has a story to tell.

"I saw Macca massaging her stump!" "Get out!" "No, really!"

Of course, that's all we ever wanted: to be famed and acclaimed, but be careful what you wish for, because fame is the bitch goddess of rumor, innuendo, slander, and gossip and the perverted purveyor of tabloid trash. She'll say anything to anyone anywhere. "Pssst! Wanna hear some real hot stories about Steven Whatsisname? *How he got there* and what he did to whom when he got there. It'll make your hair stand on end—and that's not all that'll stand on end, baby. Wanna see some Paris Hilton-type sex tapes? Wanna hear some nasty shit secretly recorded by his babysitter—I swear!" Oh, yeah . . . that shit goes on. Tapes of the babysitter overhearing every private conversation you ever had with your children, band mates, accountants, ex-wives, even your fucking proctologist. In the end, even the babysitter's story makes you look like an asshole.

Once you become a rock star—something you've prayed for fervently since you were sixteen, making promises to sleazy saints and strange goddesses of the night—all bets are off.

After you're famous, it's all simple and brutal: you're either loved across the board for things you *did* do . . . or sneered at for things you *didn't* do—or vice versa. Either way, you become a dartboard for other people's fears, doubts, and insecurities, and right there in the bull's-eye are the two terrible tabloid twins: sex

and drugs. Now, of course, the good stories—we claim proud ownership of those. As for all the rest, well, we don't read our own press . . . wink wink. But that's horseshit. One way or another we eventually get to hear all the news that'll blow a fuse. If we don't read it, we're sure to hear it from girlfriends, mothers, fathers—or our best friends. Then there's the occasional "Tyler's in Room 221" written in smoky letters across the sky by a stunt pilot who found that we were staying at the Four Seasons in Maui, who got his info from the concierge who got it from the bellboy who got a phone call from the airline steward who sent the call the second he saw your ugly face getting off the plane. "LEND THE FAMILY PARROT TO THE TOWN CRIER!"

No matter what you do, there's someone putting together a little bag of anecdotes in which you're prominently featured doing nasty stuff. If I get gas down at the corner, the woman who pumps my gas is going to be telling all her friends the next day. And the story will grow: not only do I get my gas there *all* the time, but I get my car serviced there, and, as matter of fact, I had dinner over at her house the night before and watched *American Idol* with her and made popcorn. And if she happens to be good-looking and your wife finds out, then you've automatically had an affair with this girl. That Stevie! The kind of things he asks you to do!

So, go on, make it up! By now Steven Tyler is pretty much a fictional character anyway—I have absolutely no control over the little fuck. I read about him and I don't know who it is.

Just the other day, I open a book and what do I find? A former Aerosmith accountant, a perfectly reasonable, rational person—someone who adds up columns of figures, divides them, amortizes them, collateralizes them—has turned into a writer of bodice-ripper romances. She's telling a lurid tale featuring little old me. The woman's become an authority on my sex life: *My dear, there's a little-known fact I'll share with you about Steven Tyler . . . Something that few people know*. By this point we're all holding our breath, we're spellbound. In a hoarse whisper, she continues:

He makes his groupies put on kinky costumes. Oh, yes, he designs them himself. He makes them recite nursery rhymes while he fucks them. He can't get it up unless they're dressed up as Little Bo Peep, Little Miss Muffet, Little Red Riding Hood. . . .

What a perv that Steven is! And that was my *accountant!*

Back to our story already in progress. . . . The band hits warp speed in the Midwest. At the helm our driver, Mark Lehman, a one-man hump-amp, rig-lights, set-up-sound-system wizard. When I saw *Almost Famous* I said, "Holy shit, is this sideways Aerosmith or what?" We were on that bus, in that plane, diving naked off rooftops into the way-out-o-sphere along with fellow demon Ted Nugent. The hallways were crowded with bad girls, seedy characters, and a waiter named Julio delivering groupies on a room service cart.

Now, one night after our show at the Paramount Theatre in Seattle in late November 1973, we're all in this big room backstage, and our very considerate promoter had invited these girls there for us. "I've got a little surprise for you boys." My, my, my, what do I spy with my little eye? Six nubile young chicks, one cuter than the next. They curtsy and introduce themselves to the band. One says, "Hello, boys, we're the Little Oral Annie Club." Well, beam me up, Scotty, says I.

Then she says, "Well, sir, we've taught each other how to give great head, so when we meet rock stars . . . we blow you like no man has been blown before." To have two girls come up and say, "Hi, we'll do each other, wanna watch?" is mind-boggling. Six hot girls and one of them whispers in your ear, "I can eat her pussy right here and now better than anyone on the planet." I think I can safely speak for all males of the species . . . this moment would have changed your religion.

All these girls were dressed up fantasy style in sexy costumes. Guys are very predictable creatures. We *all* like school-girls in plaid skirts, women in high heels and fishnet stockings. . . . Strawberry Fields, as she called herself, was their den mother—kind of heavysset and a little older, but she knew what

rock stars—hell, what all boys—wanted. As for the *me* that I thought I knew? He'd left the building! This woman *knew*. She knew how to take care of her girls and how to please the boys.

Speaking of which, remember a little group of nasty girls called the Plaster Casters? There were originally two Plaster Casters, but soon more were needed. If Led Zeppelin were in town, say, and the first two girls were busy . . . well, that night they would send another couple of girls over to do the Allman Brothers. Eventually there were more girls involved at each session: a plethora of plasterers. One cooked up the plaster, the second one did the fluffing, and the third one would cast the mold and put it in her Easy-Bake oven. I never had my plaster casted, 'cause I always believed in mystery meat. I figured if I got the cast, it would wind up on someone's mantelpiece somewhere, and people would be going, "*That's Steven Tyler's dick?*" We'd lost half our audience right there.

The girls are parading around in their outfits, and I'm talking to Strawberry Fields—she's got my attention—and other parts of my anatomy, too, by now—and she's telling me all the stuff they do. Groupie Geishas! I wanted to say, "As long as I've got a face, you'll always have a place to sit," but it came out, "Igloo bofrim modden ginsky" . . . but what I meant to say was "Blahimi auhfern koofnard gynolia?"

"So, uh, you girls, you dress up in different outfits?" I asked.

"Well, of course, we have any kind of costume you want," chimes Ms. Fields. "Just tell me. We're here to please." This was way before you could call a service and say, "Send over a couple of hookers dressed up like Jack Sparrow and Whoopi Goldberg." Strawberry Fields had the costumes made to order for your particular perverted fantasy—any fucking fantasy your twisted little heart desired. Out of this entire erotic circus, there was one day where seven girls showed up dressed like Joe Perry with tits. No one got laid *that* night.

Penny Lane, the groupie Kate Hudson played in *Almost Famous*, could easily have been based on sweet . . . hell, I'm not

even going to give the girl a pseudonym, but that *was* her, my girlfriend to be, one of the six girls in the Little Oral Annie Club we met that night. She was sixteen, she knew how to nasty, and there wasn't a hair on it. With my bad self being twenty-six and she barely old enough to drive and sexy as hell, I just fell madly in love with her. She was a cute skinny little tomboy dressed up as Little Bo Peep. She was my heart's desire, my partner in crimes of passion.

Early on in the band when I was still Jung and easily Freudened, I'd blurt out my sexual fantasies. I thought I was just being honest and saying what was on everybody's mind, but I made the mistake of talking this stuff in front of the band's wives. You know, stuff like how I liked doing it with two girls—twins, preferably. "You're disgusting, Steve!" one of the band wives blurted out (I hate it when people call me "Steve"; always a tinge of squinge attached to Steve). I'd say, "What? Boys don't like threesomes? Don't *all* boys dream about that?"

And did I expect my band mate to say, "Oh, yeah, I'm sorry, baby, that *is* my secret fantasy. And, honey, while Steven's brought up the subject of sexual fantasies, did I ever tell you I've always wanted you to dress up in a Nazi uniform and order me to goose-step on your great white plain?" What was I thinking? No man is going to tell his wife what he really likes. Because when he gets home, she'll Lorena Bobbitt his ass and he'll never find his licorice nib again.

Any cop will tell you that the things people lie about most are sex and drugs—and in that order—so hypocrisy is the order of the day. I would just sit there, flabbergasted, going, "Oh, really? You mean boys *don't* like girls going down on each other?" I think I'm on firm theoretical grounds in saying this, but I always welcome other points of view.

Of course, nowadays, in every fuck club or strip joint, it's fashionable—hell, it's mandatory—for two girls to kiss and jam out with their clam out. Why did it take so long? That's how they get your attention; now they *know*.

Can I help it if I was ahead of my time? Back then, I used to say, "Aw, c'mon, all guys like a close shave." In the year 2011 it's become fashionable for girls from sixteen to sixty to be cut to the quick. It's waxed, smacked, and shellacked. Do we need to do a survey? They may have a landing strip, so flight attendants, please remain seated until my face comes to a complete and full stop. I remember one night on the road when Joe and I were sharing a bed with two girls and woke up in the morning with a seafood blue plate special. Crabs for . . . everybody! And I'm the last guy on the planet to use that little Barbie Doll comb that used to come with a bottle of A-200 that would burn the critters out. At one point, I had so many crabs, I used to say good night to them.

My little oral Annie came back with me to the hotel, the Edgewater Inn in Seattle, where we sat in the tub for two hours, naked with no water, when it dawned on me there was an emergency cord in the bus we'd taken to the hotel. So I went down (on my way knocking on Ted Nugent's door), cut the cord with a pair of pliers I had in my bag, brought it up to my room, attached a fish hook from hell to it, ordered ham sandwiches—which is all you could get after midnight—put the ham on the hook, and dropped it out the window. We pulled up mud sharks and codfish for the next four hours and proceeded to clean the fish and gut the two sharks. Then Ted says, "Check this out." And lays the two hearts on the sink. "Okay, now go to bed," orders the madman. Next morning, my phone rings and it's Ted. "Steven, go into the bathroom and check out the heart." I touch the sea critter with my finger and I'll be damned if the heart didn't start beating . . . nine hours later! Which only proves one thing . . . which I can't remember just now. "You can't kill a lawyer," could that be it?

Nugent suggested we have a fish fry at the gig. So we filleted the cod we caught, put 'em in a cooler, and took 'em to the gig that night with us. I offered him my crabs, but he politely declined.

I was so in love I almost took a teen bride. I went and slept

at her parents' house for a couple of nights and her parents fell in love with me, signed papers over for me to have custody, so I wouldn't get arrested if I took her out of state. I took her on tour with me. My Sweet Eeee. . .

*Standin' in front just shakin' your ass,
Take you backstage you can drink from my glass.
Talk about something you can sure understand
'Cause a month on the road and I'll be eatin' from your hand.*

That was her. I lived with her for three years. She was a sweet, mysterious creature . . . very smart, and she knew what she liked and what I liked. We took baths together. She wore skirts with no panties. We did it on the red-eye from L.A. to Boston . . . that kind of stuff. All the things that guys dream about.

We made love in public, in private, and tried positions the *Kama Sutra* has yet to come up with. One time we started out in a hot tub on the roof and wound up in the lobby. We got out of the hot tub naked and into the elevator and dared each other we couldn't make it all the way down to our room without being seen. We hit every floor starting with the lobby . . . unfortunately, it went there first. It was so erotic and romantic that by the time we got to the lobby, we were coming and going all at the same time. When the doors opened, there was an Amish family staring at us like figures in an oil painting. The door closes, then it opens again, and someone says, "Can I have your autograph?"

That sweet girl used to recite poetry and constantly sing songs to me like my mother did when she put me to sleep. It was an inspiration to my heart. One of the songs she taught me was "We Are Siamese," which I'm sure you'll all remember from the movie *Lady and the Tramp*.

Like I said, so sweet. Not like me.

At the end of the tour I brought her home to Boston. We got on well for a while . . . we were best friends and did everything together. She even knew how to mow a lawn. That impressed me.

There's a picture of us in *People* magazine sitting on my tractor. But toward the end things started to derail. We got so messed up on drugs and were so out of control that the dark side started taking over. And while I was on the road, our apartment almost burned down and she wound up in the hospital with smoke inhalation. I went to see her in the hospital and that's when reality slapped me in the face. When you love somebody, set them free. And I just had to let her go. She went back to her parents, but I can still see her in the songs we sang together. And the greatest thing she taught me . . . that *love is love reflected*.

So much to be dealt with when you fall. And I fell hard. And I fell heavy. And I fell so in love. Was it from songs? From my Italian family? From heaven or hell? I'm a breeder. Been married twice. They say never trust a rock musician? We can write songs about love but we're not allowed to *be* in love. "Oh, yeah, that's right. I fell in love with you from the side of the stage, surrounded *by other women*," your significant other would say if she were honest. But they don't think that. You get *married*, and sometimes you fall from God's grace. You're sitting there saying to them, "Yeah, but sweetheart . . . you see the girls screaming at me every night. I don't sleep with them, I just make love to them through my music. And that stage is my mistress. Why are you angry at *me*?" And, actually, I *liked* it. When I was younger and easily impressed I watched my heroes and I was enticed by that . . . the crowds, the adulation, the sexuality, and the girls that loved rock guys. It certainly wasn't the money.

You know, guys in rock bands aren't the only devils. Wives can be just as bad. I've known some wives that cheated on the guys while they were on tour and the husbands never knew it! And they said I should be wearing the genital cuff?

I came up with the second album title, *Get Your Wings*, after reading a book on the Hells Angels. Getting your wings is a Hells Angels thing. If you give a girl head when she has her period,

you are definitely one of the guys and, my friend, you've got your wings. The album came out in March 1974—and we were on the road again. We toured like gypsy possessed. We opened for Mott the Hoople, Black Sabbath, Blue Öyster Cult, the Guess Who, and Kiss. We were on tour continually and endlessly. We made as little as five hundred dollars a night in places where they didn't know us and almost four grand where they did. *Get Your Wings* was bubbling in the Hot 100. And as a result of our never-ending road juggernaut, it got us our first gold record the following year.

That spring we opened for Hawkwind (the Brit sci fi rockers) at Alex Cooley's Electric Ballroom in Atlanta. Every night there'd be a girl in the front row, very scantily clad, silver glitter spray all over her body, and little nipple cups. And really *hot*. Stone gorgeous. She was the Glitter Queen and she came to every show we ever played in Atlanta.

We did a great show at Cooley's one night. I was up in the dressing room afterward . . . the backstage was full of people, along with a couple of girls in the dressing room, naked. My old childhood friend Ray was there. He was working his ass off with the band and had a bag of blow. Ray had the greatest connections—the red Lebanese hash with a camel embossed on the bag, same as the stuff he'd scored for Led Zeppelin—oh how they loved that shit!

One of my band mates took a look at the Glitter Queen and he was *gone!* She disappeared and so did he. I think she swallowed him up a couple of times.

The girl standing there in front of me was *hot*, not to mention very ambidextrous. She could bend over backward—my kinda girl—and she had a flat head where I could rest my beer. A little-known quality in those who bend. Later, Ray had this same girl in the toilet stall, she's standing on her head with her feet up against the wall, and he's pretending to pour Jack Daniel's into her 'gynie . . . but actually pouring it into a shot glass and sticking the shot glass into her coo-ha and drinking out of it with a straw.

When Ray was done, he poured Jack on his schvantz 'cause he thought it would kill the herpes he was about to get. One snort leads to another, and pretty soon it's two hours later.

My band mate—who will remain nameless—is hiding backstage, ramming the Glitter Queen with the silver paint all over her body, while we're getting gacked to the nines on blow (which we called "krell") in the dressing room. Mötley Crüe says they coined that term for coke in the eighties after the Krell, the people who lived on the *Forbidden Planet*.

"Hey, where were you?" I inquire, when said band mate returns. But when he gets close enough, we know. We all fall down laughing because his face and shirt are covered with silver glitter paint. There's silver paint in his hair, glitter all over his mouth—his penis looks like the Tin Man. And up behind him comes the Glitter Queen herself with all the silver paint rubbed off her breasts and her pussy. Oh, man!

We'd come offstage just shy of midnight. They'd shooed everybody out of the club and closed up. By now it's 3:00 A.M. I go downstairs and I can't get out so I run back up. "Omigod, you guys, we're chained in! There are chains across every door." What *were* we going to do! Locked in with a pile of blow, Jack Daniel's, and a bunch of hot naked chicks? The only way to get out was to force open the door a crack and then you could climb up and over—which I did. I got out, made a phone call to Alex Cooley, and it took an hour before anybody came . . . for the fifth time. I know, I know. We were younger then.

Upon returning to the hotel I recited my nightly prayer . . .

*Now I lay me down to sleep, I pray the Lord my soul to keep
You keep my soul, I know it's taken
Hope you don't mind if I stab my bacon.*

All these girls had to do was look on the back of the album and see what the tour manager's name was—and if you're in Chicago, call up every hotel that Aerosmith might be staying at,

which would whittle it down to maybe four, call the front desk and say, "I'm looking for Kelly, he's my cousin, he'll be coming with Aerosmith." It took the fans twenty years to get hip to this and me twenty-five years to figure it out.

That is assuming, and it's quite a lot to assume, that the tour manager would have even been available or would have given a fuck about my aching needs. Tour managers, I found out later, had other things on their mind, such as hobnobbing all night long with people they knew from the last time we'd played there, people with primo blow.

So many nights I went to sleep dreaming that two gorgeous, nasty twins were going to knock on my door, cover me in rose petals, and perform an after-midnight rectal examination. . . . But no way, they never arrived. Perhaps they didn't know I sometimes used the name I. K. Malone when I checked in. The chick at the front desk had a field day with that. "I'll be right up," she would say.

You get into a hotel elevator in a place you played the night before, and you know the last fucking person you want to meet is someone going, "Oh! My god! It's *you!*" in that Valley Girl accent. This person in the Hyatt House elevator is having a God experience and you haven't had coffee yet. By the time you're through your fifteenth or twentieth person having a religious experience, you wish you were a gasket salesman from Omaha.

You get home that night, the next day you wake up—it's your day off!—and step outside and what do you see but the three-hundred-pound guy in sweatpants you'd run into in the elevator the day before. He's camped outside your door and he's drying his clothes on your lawn. Perfect!

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Born Steven Victor Tallarico on March 26, 1948, in Yonkers, New York, **STEVEN TYLER** is the iconic songwriter, composer, and voice of Aerosmith—America's greatest rock 'n' roll band—and is considered one of rock's most recognizable and dynamic frontmen. *Rolling Stone* magazine has cited him as one of the greatest singers of all time.

After coming together in Sunapee, New Hampshire, in the late sixties, five musicians made the decision to move to Boston, live together, and become the band we know today as Aerosmith: Tyler as frontman, guitarist Joe Perry, bassist Tom Hamilton, guitarist Ray Tabano, later replaced by Brad Whitford, and drummer Joey Kramer. The band has sold more than 100 million records across the globe and won numerous prestigious awards—multiple Grammys, American Music awards, Billboard awards, and MTV awards—and was inducted into the Rock 'n' Roll Hall of Fame in 2001.

Aerosmith has infiltrated rock history with their memorable appearances in *Wayne's World* and *The Simpsons*, at the halftime show at Super Bowl XXXV in 2001, and in their own Aerosmith version of Guitar Hero. Their number one single, "Don't Want to Miss a Thing," was nominated for an Academy Award® for best song for the movie *Armageddon*. In December 2010, Tyler performed for President Obama and the First Lady in a special tribute to Sir Paul McCartney at the Kennedy Center Honors. In January 2011, Tyler joined Jennifer Lopez, Randy Jackson, and host Ryan Seacrest as a judge on the Fox TV phenomenon *American Idol*.

DAVID DALTON, a founding contributor of *Rolling Stone*, is the author of some fifteen books, including *James Dean: The Mutant King*, *El Sid: St. Vicious*, *Piece of My Heart*, *Mindfuckers*, *Painting Below Zero*, *Faithfull with Marianne*, *Been Here and Gone*, and *Bob's Brain: Decoding Dylan*, which will be published in late 2011.

WWW.STEVENTYLER.COM

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er is an unalloyed genius."
—NEW YORK TIMES



STEVEN TYLER

DOES THE NOISE
IN MY HEAD
BOTHER YOU?

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EXHIBIT 5

1 Michael Reck, State Bar No. 209895
mreck@andersonadvocates.com
2 **JEFF ANDERSON & ASSOCIATES PA**
12011 San Vicente Boulevard, Suite 700
3 Los Angeles, California 90049
Tel: 310-357-2425
4 Fax: 651-297-6543

5 Attorneys for Plaintiff JULIA MISLEY

6 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

7 **FOR THE COUNTY OF LOS ANGELES – TORRANCE COURTHOUSE**

This Matter Relates to:

8 JULIA MISLEY, formerly known as JULIA
9 HOLCOMB, an individual,

10 Plaintiff,

11 vs.

12 STEVEN VICTOR TALLARICO A/K/A STEVEN
TYLER, an individual; and DOES 2 through DOE
13 50, inclusive,

14 Defendant

) Case No.: 22TRCV01604

) Assigned to Hon. Gary Y. Tanaka, Dept. B

) **PLAINTIFF JULIA MISLEY’S**
) **RESPONSE TO DEFENDANT STEVEN**
) **TYLER’S REQUEST FOR**
) **ADMISSIONS, SET ONE**

) Action Filed: December 27, 2022

) Trial Date: None Set

15
16 **PROPOUNDING PARTY: DEFENDANT STEVEN VICTOR TALLARICO A/K/A TYLER**

17 **RESPONDING PARTY: PLAINTIFF JULIA MISLEY F/K/A JULIA HOLCOMB**

18 **SET: ONE**

19
20 Plaintiff Julia Misley (hereinafter, “Plaintiff” or “Responding Party”) hereby responds to
21 Defendant Steven Tyler’s (hereinafter, “Defendant” or “Propounding Party”) Request for
22 Admissions, Set One, as follows:

23 ///

24 **PRELIMINARY STATEMENT AND GENERAL OBJECTIONS**

25 The following RESPONSE TO REQUEST FOR ADMISSIONS are made solely for the
26 purpose of this action. Any document or information supplies in RESPONSE TO REQUEST FOR
27 ADMISSION is subject to all objections as to competence, relevance, materiality, propriety and
28

1 admissibility, and to any and all other objections on any ground that would require the exclusion of
2 any information or document or thing, or portion thereof, if such document or thing were offered in
3 evidence, all of which objections and grounds are expressly reserved and may be interposed at the
4 time of trial.

5 This preliminary statement is incorporated into each and every one of the following
6 responses to REQUEST FOR ADMISSIONS.

7 **RESPONSES TO DEFENDANT'S REQUEST FOR ADMISSIONS, SET ONE**

8 **REQUEST FOR ADMISSION NO. 1:**

9 Admit that Steven Tyler did not commit sexual battery on you.

10 **RESPONSE TO REQUEST FOR ADMISSION TO NO. 1:**

11 Deny.

12 **REQUEST FOR ADMISSION NO. 2:**

13 Admit that Steven Tyler did not commit sexual assault on you

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

15 Deny.

16 **REQUEST FOR ADMISSION NO. 3:**

17 Admit that Steven Tyler did not commit intentional infliction of emotional distress on you.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

19 Deny.

20 **REQUEST FOR ADMISSION NO. 4:**

21 Admit that you do not have any videos of Steven Tyler.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

23 Plaintiff is unable to respond as many pictures are publicly available.

24 **REQUEST FOR ADMISSION NO. 5:**

25 Admit that you do not have any pictures of Steven Tyler.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

27 Plaintiff is unable to respond as many pictures are publicly available.

28 **REQUEST FOR ADMISSION NO. 6:**

1 Admit that you do not have any evidence of sexual battery committed by Steven Tyler on
2 you.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

4 Deny.

5 **REQUEST FOR ADMISSION NO. 7:**

6 Admit that you do not have any evidence of sexual assault committed by Steven Tyler on
7 you.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

9 Deny.

10 **REQUEST FOR ADMISSION NO. 8:**

11 Admit that you do not have any evidence of intentional infliction of emotional distress by
12 Steven Tyler on you.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 8:**

14 Deny.

15 **REQUEST FOR ADMISSION NO. 9:**

16 Admit that when you first met Steven Tyler, you were not a virgin.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 9:**

18 Plaintiff objects to this request as it is not reasonably calculated to lead to the discovery of
19 relevant, admissible evidence..

20 **REQUEST FOR ADMISSION NO. 10:**

21 Admit that you were in love with Steven Tyler.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 10:**

23 Admit.

24 **REQUEST FOR ADMISSION NO. 11:**

25 Admit that Steven Tyler was in love with you.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

27 Plaintiff lacks information and belief sufficient to determine the truth or falsity of the
28 request despite a reasonable inquiry into the matter and therefore denies.

1 **REQUEST FOR ADMISSION NO. 12:**

2 Admit that Steven Tyler has not made any false statements about you.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 12:**

4 Deny.

5 **REQUEST FOR ADMISSION NO. 13:**

6 Admit that Steven Tyler has not committed defamation about you.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 13:**

8 Plaintiff objects to this request as it calls for a legal conclusion and is irrelevant.

9 **REQUEST FOR ADMISSION NO. 14:**

10 Admit that one or more of your parents signed a document granting Steven Tyler legal
11 guardianship over you.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 14:**

13 Plaintiff lacks information and belief sufficient to determine the truth or falsity of the
14 request despite a reasonable inquiry into the matter and therefore denies.

15 DATED: March 15, 2022

JEFF ANDERSON & ASSOCAITES, P.A.

17 By: 

18 Michael Reck
19 Attorneys for Plaintiff JULIA MISLEY F/K/A
20 JULIA HOLCOMB
21
22
23
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25
26
27
28

VERIFICATION (C.C.P. 446 AND 2015.5)

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I have read the foregoing PLAINTIFF JULIA MISLEY'S RESPONSES TO DEFENDANT STEVEN TYLER'S REQUEST FOR ADMISSIONS. SET ONE and know its contents.

CHECK APPLICABLE PARAGRAPHS

- I am a party to this action. The matters stated in the foregoing document are true of my own knowledge, except as to those matters which are stated on information and belief, and as to those matters, I believe them to be true.
I am an officer a partner a of

a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason.

- I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.
The matters stated in the foregoing document are true of my own knowledge, except as to those matters which are stated on information and belief, and as to those matters, I believe them to be true.

- I am one of the attorneys for a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed on (date) at California. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

JULIA MISLEY F/K/A JULIA HOLCOMB
Type or Print Name

Julia Misley
Signature

PROOF OF SERVICE
CCP 1013a(3) Revised 5 1 88

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of State of California. I am over the age of 18 and not a party to the within action; my business address is

On (date) **I served the foregoing document described as on in this action

- by placing the true copies thereof enclosed in sealed envelopes addressed as stated on the attached mailing list:
by placing the original a true copy thereof enclosed in sealed envelopes addressed as follows:

BY MAIL

- I deposited such envelope in the mail at California. The envelope was mailed with postage thereon fully prepaid.
As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day, with postage thereon fully prepaid at California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

Executed on (date) at California. I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

SEE ATTACHED PROOF OF SERVICE

Type or Print Name

Signature

*(BY MAIL. SIGNATURE MUST BE OF PERSON DEPOSITING ENVELOPE IN MAIL SLOT. BOX OR BAG)
**FOR PERSONAL SERVICE. SIGNATURE MUST BE THAT OF MESSENGER)

ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NO: 209,895 NAME: MICHAEL RECK, ESQ. FIRM NAME: JEFF ANDERSON & ASSOCIATES, P.A. STREET ADDRESS: 12011 SAN VICENTE BLVD., STE 700 CITY: LOS ANGELES STATE: CA ZIP CODE: 90049 TELEPHONE NO.: 310-357-2425 FAX NO.: 651-297-6543 E-MAIL ADDRESS: mreck@andersonadvocates.com ATTORNEY FOR (name): Plaintiff Julia Misley F/K/A Julia Holcomb	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 825 MAPLE AVE MAILING ADDRESS: SAME CITY AND ZIP CODE: TORRANCE 90503 BRANCH NAME: TORRANCE COURTHOUSE	CASE NUMBER: 22TRCV01604
PLAINTIFF/PETITIONER: JULIA MISLEY, formerly known as JULIA DEFENDANT/RESPONDENT: STEVEN VICTOR TALLARICO A/K/A STEVEN TYLER	JUDICIAL OFFICER: Hon. Gary Y. Tanaka
PROOF OF ELECTRONIC SERVICE	DEPARTMENT: B

1. I am at least 18 years old.

- a. My residence or business address is (specify):
 12011 SAN VICENTE BLVD.
 STE 700
 LOS ANGELES, CA 90049
- b. My electronic service address is (specify):
 KRYSTAL.PAZANTI@ANDERSONADVOCATES.COM

2. I electronically served the following documents (exact titles):

PLAINTIFF JULIA MISLEY'S RESPONSE TO DEFENDANT STEVEN TYLER'S REQUEST FOR ADMISSIONS, SET ONE

The documents served are listed in an attachment. (Form POS-050(D)/EFS-050(D) may be used for this purpose.)

3. I electronically served the documents listed in 2 as follows:

- a. Name of person served: SHAWN HOLLEY
 On behalf of (name or names of parties represented, if person served is an attorney):
 DEFENDANT STEVEN TYLER
- b. Electronic service address of person served :
 SHOLLEY@KWIKHLAW.COM
- c. On (date): 4/24/2023

The documents listed in item 2 were served electronically on the persons and in the manner described in an attachment.
 (Form POS-050(P)/EFS-050(P) may be used for this purpose.)

Date: 4/24/2023

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

KRYSTAL PAZANTI

 (TYPE OR PRINT NAME OF DECLARANT)



 (SIGNATURE OF DECLARANT)

EXHIBIT 6

1 Michael Reck, State Bar No. 209895
mreck@andersonadvocates.com
2 **JEFF ANDERSON & ASSOCIATES PA**
12011 San Vicente Boulevard, Suite 700
3 Los Angeles, California 90049
Tel: 310-357-2425
4 Fax: 651-297-6543

5 Attorney for Plaintiff JULIA MISLEY

6 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
7 **FOR THE COUNTY OF LOS ANGELES – TORRANCE COURTHOUSE**

8 This Matter Relates to:)	Case No.: 22TRCV01604
9 JULIA MISLEY, formerly known as JULIA)	Assigned to Hon. Gary Y. Tanaka, Dept. B
10 HOLCOMB, an individual,)	
11 Plaintiff,)	PLAINTIFF JULIA MISLEY’S RESPONSE TO DEFENDANT STEVEN TYLER’S SPECIAL INTERROGATORIES, SET ONE
12 vs.)	
13 STEVEN VICTOR TALLARICO A/K/A STEVEN)	
14 TYLER, an individual; and DOES 2 through DOE 50, inclusive,)	
15 Defendant)	Action Filed: December 27, 2022
		Trial Date: None Set

16 **PROPOUNDING PARTY:** DEFENDANT STEVEN VICTOR TALLARICO A/K/A TYLER
17 **RESPONDING PARTY:** PLAINTIFF JULIA MISLEY F/K/A JULIA HOLCOMB
18 **SET:** ONE

19
20
21 Plaintiff Julia Misley (hereinafter, “Plaintiff” or “Responding Party”) hereby responds to
22 Defendant Steven Tyler’s (hereinafter, “Defendant” or “Propounding Party”) Special
23 Interrogatories, Set One, as follows:

24 ///

25 **PRELIMINARY STATEMENT AND GENERAL OBJECTIONS**

26 The following RESPONSE TO SPECIAL INTERROGATORIES are made solely for the
27 purpose of this action. Any document or information supplied in RESPONSE TO ANY SPECIAL
28 INTERROGATORY is subject to all objections as to competence, relevance, materiality, propriety

1 and admissibility, and to any and all other objections on any ground that would require the exclusion
2 of any information or document or thing, or portion thereof, if such document or thing were offered
3 in evidence, all of which objections and grounds are expressly reserved and may be interposed at
4 the time of trial.

5 This preliminary statement is incorporated into each and every one of the following
6 responses to SPECIAL INTERROGATORIES.

7 **RESPONSES TO DEFENDANT’S SPECIAL INTERROGATORIES, SET ONE**

8 **SPECIAL INTERROGATORY NO. 1:**

9 State all facts that support your first cause of action for sexual battery against Steven Tyler
10 as alleged in your COMPLAINT. ("COMPLAINT" means the First Amended Complaint you filed
11 against Steven Tyler in this action).

12 **RESPONSE TO SPECIAL INTERROGATORY TO NO. 1:**

13 Responding Party objects as this interrogatory calls for a legal conclusion and seeks the
14 legal reasoning and theories of Plaintiff’s contentions. Plaintiff is not required to prepare the
15 defendant’s case. Responding Party further objects as this interrogatory is vague as to the term
16 “sexual battery.” Responding Party further objects as this interrogatory is so broad and unlimited as
17 to time and scope as to be an unwarranted annoyance, embarrassment and is oppressive. To comply
18 with the request would be an undue burden and expense on the Plaintiff. Responding Party objects
19 to this request on the grounds that it calls for documents readily available from defendant. Subject
20 to and notwithstanding the foregoing objections, Responding Party responds as follows:

21 Defendant admits sexual assault in the books *Walk this Way* and *Does the Noise in My Head Bother*
22 *You?*, both authored by Defendant.

23 Discovery is ongoing and Responding Party reserves the right to supplement this response.

24 **SPECIAL INTERROGATORY NO. 2:**

25 IDENTIFY ALL PERSONS with knowledge of facts in connection with your first Cause
26 of action for sexual battery against Steven Tyler as alleged in your COMPLAINT. (“PERSON”
27 means any natural person, corporation, firm, company, sole proprietorship, partnership, limited
28 liability Company, limited liability partnership, joint venture, association, institute, or any other

1 business, legal, or governmental entity, or any other artificial persons or groups of persons of any
2 kind no matter how identified or organized. IDENTIFY ALL PERSONS means to state the name,
3 address, telephone number, and email of the PERSON).

4 **RESPONSE TO SPECIAL INTERROGATORY NO. 2:**

5 Responding Party objects as this interrogatory is vague and ambiguous as to “facts in
6 connection with” and is so broad and unlimited as to time and scope as to be an unwarranted
7 annoyance, embarrassment and is oppressive. Subject to and notwithstanding the foregoing
8 objections, Responding Party responds as follows: Steven Tallarico, [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

26 [REDACTED]

27 [REDACTED]

28 [REDACTED]

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]

4 Discovery is ongoing and Responding Party reserves the right to supplement this response.

5 **SPECIAL INTERROGATORY NO. 3:**

6 State all facts that support your second cause of action for sexual assault against Steven
7 Tyler as alleged in your COMPLAINT.

8 **RESPONSE TO SPECIAL INTERROGATORY NO. 3:**

9 Responding Party objects as these interrogatory calls for a legal conclusion and seeks the
10 legal reasoning and theories of Plaintiff's contentions. Responding Party further objects as this
11 interrogatory is vague as to the term "sexual assault." Responding Party further objects as this
12 interrogatory is so broad and unlimited as to time and scope as to be an unwarranted annoyance,
13 embarrassment and is oppressive. Responding Party objects to this request on the grounds that it
14 calls for documents readily available from defendant. Subject to and notwithstanding the foregoing
15 objections, Responding Party responds as follows:

16 Defendant admits sexual assault in the books *Walk this Way* and *Does the Noise in My Head Bother*
17 *You?*, both authored by Defendant.

18 Discovery is ongoing and Responding Party reserves the right to supplement this response.

19 **SPECIAL INTERROGATORY NO. 4:**

20 IDENTIFY ALL PERSONS with knowledge of facts in connection with your second cause
21 of action for sexual assault against Steven Tyler as alleged in your COMPLAINT.

22 **RESPONSE TO SPECIAL INTERROGATORY NO. 4:**

23 Responding Party objects as this interrogatory is vague and ambiguous as to "facts in
24 connection with" and is so broad and unlimited as to time and scope as to be an unwarranted
25 annoyance, embarrassment and is oppressive. Responding Party further objects as this interrogatory
26 is vague as to the term "sexual assault." Subject to and notwithstanding the foregoing objections,
27 Responding Party responds as follows: Steven Tallarico, [REDACTED]
28 [REDACTED]

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]

23 Discovery is ongoing and Responding Party reserves the right to supplement this response.

24 **SPECIAL INTERROGATORY NO. 5:**

25 State all facts that support your third cause of action for intentional infliction of emotional
26 distress against Steven Tyler as alleged in your COMPLAINT.

27 **RESPONSE TO SPECIAL INTERROGATORY NO. 5:**

28 Responding Party objects as these interrogatory calls for a legal conclusion and seeks the

1 legal reasoning and theories of Plaintiff’s contentions. Responding Party further objects as this
2 interrogatory is vague as to the term “emotional distress.” Responding Party further objects as this
3 interrogatory as it calls for an expert opinion. Responding Party further objects as this interrogatory
4 is so broad and unlimited as to time and scope as to be an unwarranted annoyance, embarrassment
5 and is oppressive. Subject to and notwithstanding the foregoing objections, Responding Party
6 responds as follows: After Plaintiff returned to Portland, OR in approximately December 1976, she
7 was a broken and wounded person. She returned with no formal high school education, no money
8 and significant emotional and mental harm. Plaintiff reconnected with her faith and through that,
9 obtained her GED and enrolled in college while rebuilding her life. She eventually met her husband
10 in approximately 1980, married and started a family. For the next 31 years, Plaintiff devoted her life
11 to her family and volunteering. She left her time with Defendant in the past and did not speak of him
12 or to him since 1978. In approximately 2011, Plaintiff’s son was browsing the internet and
13 discovered a Star Magazine article published on February 14, 2011, that named Plaintiff as the
14 subject of chapter six in Defendants book “*Does the Noise in My Head Bother You?*.” Because of
15 this chapter, the media soon linked Plaintiff’s name to the details and thrust Plaintiff into the
16 spotlight without her consent. Plaintiff was forced to disclose her past to her children, relatives and
17 friends, a past she had preferred to leave behind. Plaintiff was made defend herself for the actions
18 she was coerced into while under the guardianship of Defendant.

19 Discovery is ongoing and Responding Party reserves the right to supplement this response.

20 **SPECIAL INTERROGATORY NO. 6:**

21 IDENTIFY ALL PERSONS with knowledge of facts in connection with your third cause
22 of action for intentional infliction of emotional distress against Steven Tyler as alleged in your
23 COMPLAINT.

24 **RESPONSE TO SPECIAL INTERROGATORY NO. 6:**

25 Responding Party objects as this interrogatory is vague and ambiguous as to “facts in
26 connection with” and is so broad and unlimited as to time and scope as to be an unwarranted
27 annoyance, embarrassment and is oppressive. Responding Party further objects as this interrogatory
28 is vague as to the term “emotional distress.” Subject to and notwithstanding the foregoing objections,

1 Responding Party responds as follows: [REDACTED]

2 [REDACTED]

3 Discovery is ongoing and Responding Party reserves the right to supplement this response.

4 **SPECIAL INTERROGATORY NO. 7:**

5 IDENTIFY ALL PERSONS with knowledge of the injuries you suffered as a result of the
6 acts of Steven Tyler as alleged in your COMPLAINT.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 7:**

8 Responding Party objects as these interrogatory calls for a legal conclusion and seeks the
9 legal reasoning and theories of Plaintiff's contentions. Responding Party further objects as this
10 interrogatory calls for an expert opinion. Responding Party further objects as this interrogatory is so
11 broad and unlimited as to time and scope as to be an unwarranted annoyance, embarrassment and is
12 oppressive. Subject to and notwithstanding the foregoing objections, Responding Party responds as
13 follows: [REDACTED]

14 [REDACTED]

15 Discovery is ongoing and Responding Party reserves the right to supplement this response

16 ..

17 **SPECIAL INTERROGATORY NO. 8:**

18 State in detail all your medications from January 1, 1973 to the present.

19 **RESPONSE TO SPECIAL INTERROGATORY NO. 8:**

20 Responding Party objects to this interrogatory as it is vague as to the term "medications."
21 Responding Party further objects as this interrogatory is so broad and unlimited as to time and scope
22 as to be an unwarranted annoyance, embarrassment and is oppressive. Responding Party further
23 objects as this interrogatory seeks to discovery Plaintiff's medical history and/or treatment which is
24 unrelated to the issues in this litigation in violation of Plaintiff's constitutionally protected right to
25 privacy under Article 1, section 1 of the California Constitution. Further, to require Plaintiff to
26 delineate her entire medical history is not reasonable calculated to lead to the discovery of admissible
27 evidence. Subject to and notwithstanding the foregoing objections, Responding Party responds as
28 follows: Amlodipine for high blood pressure.

1 Discovery is ongoing and Responding Party reserves the right to supplement this response.

2 **SPECIAL INTERROGATORY NO. 9:**

3 IDENTIFY ALL PERSONS who provided health care services to you from January 1, 1973
4 to the present.

5 **RESPONSE TO SPECIAL INTERROGATORY NO. 9:**

6 Responding Party objects to this interrogatory as it is vague as to the term “health care
7 services.” Responding Party further objects as this interrogatory is so broad and unlimited as to time
8 and scope as to be an unwarranted annoyance, embarrassment and is oppressive. Responding Party
9 further objects as this interrogatory seeks to discovery Plaintiff’s medical history and/or treatment
10 which is unrelated to the issues in this litigation in violation of Plaintiff’s constitutionally protected
11 right to privacy under Article 1, section 1 of the California Constitution. Subject to and
12 notwithstanding the foregoing objections, Responding Party responds as follows: [REDACTED]

13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]

17 Discovery is ongoing and Responding Party reserves the right to supplement this response.

18 **SPECIAL INTERROGATORY NO. 10:**

19 State all dates that you went to a health care provider from January 1, 1973 to the present.

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 10:**

21 Responding Party objects to this interrogatory as it is vague as to the term “health care
22 provider.” Responding Party further objects as this interrogatory is so broad and unlimited as to time
23 and scope as to be an unwarranted annoyance, embarrassment and is oppressive. Responding Party
24 further objects as this interrogatory seeks to discovery Plaintiff’s medical history and/or treatment
25 which is unrelated to the issues in this litigation in violation of Plaintiff’s constitutionally protected
26 right to privacy under Article 1, section 1 of the California Constitution. Subject to and
27 notwithstanding the foregoing objections, Responding Party responds as follows: Approximately
28 October 1975; early winter 1977; summer 1981; 1982, 1983, 1984, 1985, 1990, 1991, 1993, 1994,

1 1997, 1998, 2000, 2001, 2020 – present.

2 Discovery is ongoing and Responding Party reserves the right to supplement this response.

3 **SPECIAL INTERROGATORY NO. 11:**

4 IDENTIFY ALL PERSONS who provided therapy services to you from January 1, 1973 to
5 the present.

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 11:**

7 Responding Party objects to this interrogatory as it is vague as to the term “therapy.”
8 Responding Party further objects as this interrogatory is so broad and unlimited as to time and scope
9 as to be an unwarranted annoyance, embarrassment and is oppressive. Responding Party further
10 objects as this interrogatory seeks to discovery Plaintiff’s medical history and/or treatment which is
11 unrelated to the issues in this litigation in violation of Plaintiff’s constitutionally protected right to
12 privacy under Article 1, section 1 of the California Constitution. Subject to and notwithstanding the
13 foregoing objections, Responding Party responds as follows: Plaintiff has not received therapy
14 services for herself.

15 Discovery is ongoing and Responding Party reserves the right to supplement this response.

16 **SPECIAL INTERROGATORY NO. 12:**

17 State all dates that you went to a therapist from January 1, 1973 to the present.

18 **RESPONSE TO SPECIAL INTERROGATORY NO. 12:**

19 Responding Party objects to this interrogatory as it is vague as to the term “therapist.”
20 Responding Party further objects as this interrogatory is so broad and unlimited as to time and scope
21 as to be an unwarranted annoyance, embarrassment and is oppressive. Responding Party further
22 objects as this interrogatory seeks to discovery Plaintiff’s medical history and/or treatment which is
23 unrelated to the issues in this litigation in violation of Plaintiff’s constitutionally protected right to
24 privacy under Article 1, section 1 of the California Constitution. Subject to and notwithstanding the
25 foregoing objections, Responding Party responds as follows: Plaintiff has not received therapy
26 services for herself.

27 Discovery is ongoing and Responding Party reserves the right to supplement this response.

28 **SPECIAL INTERROGATORY NO. 13:**

1 State all dates that Steven Tyler committed sexual battery on you.

2 **RESPONSE TO SPECIAL INTERROGATORY NO. 13:**

3 Responding Party objects to this interrogatory as it is vague as to the term “sexual battery.”
4 Responding Party further objects as this interrogatory is so broad and unlimited as to time and scope
5 as to be an unwarranted annoyance, embarrassment and is oppressive. Subject to and
6 notwithstanding the foregoing objections, Responding Party responds as follows: Plaintiff is not
7 able to specify specifics dates she was sexually battered by Defendant, multiple sexual assaults
8 happened between November 1973 and October 1975.

9 Discovery is ongoing and Responding Party reserves the right to supplement this response.

10 **SPECIAL INTERROGATORY NO. 14:**

11 State all dates that Steven Tyler committed sexual assault on you.

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 14:**

13 Responding Party objects as these interrogatory calls for a legal conclusion and seeks the
14 legal reasoning and theories of Plaintiff’s contentions. Responding Party further objects as this
15 interrogatory is vague as to the term “sexual assault.” Responding Party objects to this interrogatory
16 as it is vague. Responding Party further objects as this interrogatory is so broad and unlimited as to
17 time and scope as to be an unwarranted annoyance, embarrassment and is oppressive. Subject to and
18 notwithstanding the foregoing objections, Responding Party responds as follows: Plaintiff is not
19 able to specify specifics dates she was sexually assaulted by Defendant, multiple sexual assaults
20 happened between November 1973 and October 1975.

21 Discovery is ongoing and Responding Party reserves the right to supplement this response.

22 **SPECIAL INTERROGATORY NO. 15:**

23 State all dates that Steven Tyler committed intentional infliction of emotional distress on
24 you.

25 **RESPONSE TO SPECIAL INTERROGATORY NO. 15:**

26 Responding Party objects as these interrogatory calls for a legal conclusion and seeks the
27 legal reasoning and theories of Plaintiff’s contentions. Responding Party objects to this interrogatory
28 as it is vague. Responding Party further objects as this interrogatory is so broad and unlimited as to

1 time and scope as to be an unwarranted annoyance, embarrassment and is oppressive. Subject to and
2 notwithstanding the foregoing objections, Responding Party responds as follows: Between
3 approximately 1973 and 1975 and in approximately October 1997 and February, 2011.

4
5 Discovery is ongoing and Responding Party reserves the right to supplement this response.

6 **SPECIAL INTERROGATORY NO. 16:**

7 State the date that you first met Steven Tyler.

8 **RESPONSE TO SPECIAL INTERROGATORY NO. 16:**

9
10 Responding Party responds as follows: Plaintiff met defendant on or about November 29, 1973.

11 Discovery is ongoing and Responding Party reserves the right to supplement this response.

12 **SPECIAL INTERROGATORY NO. 17:**

13 IDENTIFY ALL PERSONS with whom you had sexual relations prior to you meeting
14 Steven Tyler.

15 **RESPONSE TO SPECIAL INTERROGATORY NO.17:**

16 Responding Party objects to the entirety of this special interrogatory as it is not reasonably
17 calculated to lead the discovery of admissible evidence. Responding Party further objects as this
18 interrogatory seeks information concerning Plaintiff's sexual conduct with individuals other than
19 Defendant and has not established specific facts showing that there is good cause for that discovery
20 in violation of C.C.P. Section 2017.220.

21 **SPECIAL INTERROGATORY NO. 18:**

22 IDENTIFY ALL PERSONS with whom you had sexual relations after you met Steven
23 Tyler.

24 **RESPONSE TO SPECIAL INTERROGATORY NO. 18:**

25 Responding Party objects to the entirety of this special interrogatory because it is not
26 reasonably calculated to lead to the discovery of admissible evidence. Responding Party further
27 objects as this interrogatory seeks information concerning Plaintiff's sexual conduct with individuals
28 other than Defendant and has not established specific facts showing that there is good cause for that

1 discovery in violation of C.C.P. Section 2017.220.

2 **SPECIAL INTERROGATORY NO. 19:**

3 IDENTIFY ALL PERSONS who committed sexual battery on you.

4 **RESPONSE TO SPECIAL INTERROGATORY NO. 19:**

5 Responding Party objects to the entirety of this special interrogatory because it is not
6 reasonably calculated to lead to the discovery of admissible evidence. Responding Party further
7 objects as this interrogatory seeks information concerning Plaintiff's sexual conduct with individuals
8 other than Defendant and has not established specific facts showing that there is good cause for that
9 discovery in violation of C.C.P. Section 2017.220. Responding Party further objects as this
10 interrogatory seeks to discovery Plaintiff's medical history and/or treatment which is unrelated to
11 the issues in this litigation in violation of Plaintiff's constitutionally protected right to privacy under
12 Article 1, section 1 of the California Constitution.

13 **SPECIAL INTERROGATORY NO. 20:**

14 State the last date that you communicated with Steven Tyler.

15 **RESPONSE TO SPECIAL INTERROGATORY NO. 20:**

16 Responding Party objects to this interrogatory as it is vague. Responding Party further
17 objects as this interrogatory is so broad and unlimited as to time and scope as to be an unwarranted
18 annoyance, embarrassment and is oppressive. Subject to and notwithstanding the foregoing
19 objections, Responding Party responds as follows:

20 Plaintiff last spoke to Steven Tyler on or about July 21, 1978.

21 Discovery is ongoing and Responding Party reserves the right to supplement this response.

22 **SPECIAL INTERROGATORY NO. 21:**

23 State the last date that you spoke with Steven Tyler.

24 **RESPONSE TO SPECIAL INTERROGATORY NO. 21:**

25 Responding Party objects to this interrogatory as it is vague. Responding Party further
26 objects as this interrogatory is so broad and unlimited as to time and scope as to be an unwarranted
27 annoyance, embarrassment and is oppressive. Subject to and notwithstanding the foregoing
28 objections, Responding Party responds as follows: Plaintiff last spoke to Steven Tyler on or about

1 July 21, 1978.

2 Discovery is ongoing and Responding Party reserves the right to supplement this response.

3 **SPECIAL INTERROGATORY NO. 22:**

4 State the last date that you had sexual relations with Steven Tyler.

5 **RESPONSE TO SPECIAL INTERROGATORY NO. 22:**

6 Responding Party objects to this interrogatory as it is vague. Responding Party further
7 objects as this interrogatory is so broad and unlimited as to time and scope as to be an unwarranted
8 annoyance, embarrassment and is oppressive.

9 Plaintiff is unable to respond to this request as the term “sexual relations” is no applicable
10 to a child sexual assault. Plaintiff will admit that the last incident of child sexual assault occurred in
11 approximately 1975.

12 Discovery is ongoing and Responding Party reserves the right to supplement this response.

13
14 **SPECIAL INTERROGATORY NO. 23:**

15 IDENTIFY ALL PERSONS with whom you discussed Steven Tyler.

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 23:**

17 Responding Party objects to this interrogatory as it is vague. Responding Party further
18 objects as this interrogatory is so broad and unlimited as to time and scope as to be an unwarranted
19 annoyance, embarrassment and is oppressive. Subject to and notwithstanding the foregoing
20 objections, Responding Party responds as follows:

21 **SPECIAL INTERROGATORY NO. 24:**

22 State the date that you returned to Portland to rebuild your life as alleged in paragraph 18
23 of your COMPLAINT.

24 **RESPONSE TO SPECIAL INTERROGATORY NO. 24:**

25 Responding Party further objects as this interrogatory is so broad and unlimited as to time
26 and scope as to be an unwarranted annoyance, embarrassment and is oppressive. Subject to and
27 notwithstanding the foregoing objections, Responding Party responds as follows:

28 Plaintiff was sent back to Portland, OR by David Krebs on or about December 1976.

1 Discovery is ongoing and Responding Party reserves the right to supplement this response

2 ..

3 **SPECIAL INTERROGATORY NO. 25:**

4 State the date that you met your husband as alleged in paragraph 18 of your COMPLAINT.

5 **RESPONSE TO SPECIAL INTERROGATORY NO. 25:**

6 Responding Party objects to this interrogatory as it is vague. Responding Party further
7 objects as this interrogatory is so broad and unlimited as to time and scope as to be an unwarranted
8 annoyance, embarrassment and is oppressive. Subject to and notwithstanding the foregoing
9 objections, Responding Party responds as follows: Plaintiff met her husband on or about May 1980.

10 Discovery is ongoing and Responding Party reserves the right to supplement this response.

11 **SPECIAL INTERROGATORY NO. 26:**

12 IDENTIFY ALL PUBLICATIONS made by Steven Tyler in which he described his abuse
13 of you without your knowledge or consent as alleged in paragraph 19 of your COMPLAINT.
14 (IDENTIFY ALL PUBLICATIONS means to state the name of the memoir or book, the date of its
15 publication, the name of the article in the publication, and the author of the article).

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 26:**

17 Responding Party objects to this interrogatory as it is vague. Responding Party further
18 objects as this interrogatory is so broad and unlimited as to time and scope as to be an unwarranted
19 annoyance, embarrassment and is oppressive. Responding Party further objections as this
20 information is only available to the Propounding Party. Subject to and notwithstanding the
21 foregoing objections, Responding Party responds as follows: *Walk this Way*, Published: 1997,
22 Author: Aerosmith with Stephen Davis; *Does the Noise in my Head Bother You?*, Published: 2011,
23 Author: Steven Tyler with David Dalton.

24 Discovery is ongoing and Responding Party reserves the right to supplement this response.

25 **SPECIAL INTERROGATORY NO. 27:**

26 IDENTIFY ALL PUBLICATIONS made by Steven Tyler in which he mentioned your
27 name.

28 **RESPONSE TO SPECIAL INTERROGATORY NO. 27:**

1 Responding Party objects to this interrogatory as it is vague. Responding Party further
2 objects as this interrogatory is so broad and unlimited as to time and scope as to be an unwarranted
3 annoyance, embarrassment and is oppressive. Responding Party further objections as this
4 information is only available to the Propounding Party. Subject to and notwithstanding the
5 foregoing objections, Responding Party responds as follows: *Does the Noise in my Head Bother*
6 *You?*, Published: 2011, Author: Steven Tyler with David Dalton.

7 Discovery is ongoing and Responding Party reserves the right to supplement this response.

8 **SPECIAL INTERROGATORY NO. 28:**

9 IDENTIFY ALL PUBLICATIONS made by Steven Tyler in which he referred to you
10 without mentioning your name.

11 **RESPONSE TO SPECIAL INTERROGATORY NO. 28:**

12 Responding Party objects to this interrogatory as it is vague. Responding Party further
13 objects as this interrogatory is so broad and unlimited as to time and scope as to be an unwarranted
14 annoyance, embarrassment and is oppressive. Responding Party further objections as this
15 information is only available to the Propounding Party. Subject to and notwithstanding the
16 foregoing objections, Responding Party responds as follows:
17 *Walk this Way*, Published: 1997, Author: Aerosmith with Stephen Davis.

18 Discovery is ongoing and Responding Party reserves the right to supplement this response.

19 **SPECIAL INTERROGATORY NO. 29:**

20 IDENTIFY ALL PUBLICATIONS in which your name is mentioned.

21 **RESPONSE TO SPECIAL INTERROGATORY NO. 29:**

22 Responding Party objects to this interrogatory as it is vague. Responding Party further
23 objects as this interrogatory is so broad and unlimited as to time and scope as to be an unwarranted
24 annoyance, embarrassment and is oppressive. Responding Party further objects as this interrogatory
25 seeks information not relevant to the subject matter of this lawsuit and not calculated to lead to the
26 discovery of admissible evidence in violation of the collateral source rule. This request is also an
27 invasion of Plaintiff's right to privacy. Subject to and notwithstanding the foregoing objections,
28 Responding Party responds as follows: *Star Magazine*, Published: February 14, 2011; *People*

1 *Magazine*, Published: August 9, 1976; *Rolling Stone*, Published: August 26, 1976.

2 Discovery is ongoing and Responding Party reserves the right to supplement this response.

3 **SPECIAL INTERROGATORY NO. 30:**

4 IDENTIFY ALL PUBLICATIONS in which you are pictured.

5 **RESPONSE TO SPECIAL INTERROGATORY NO. 30:**

6 Responding Party objects to this interrogatory as it is vague. Responding Party further
7 objects as this interrogatory is so broad and unlimited as to time and scope as to be an unwarranted
8 annoyance, embarrassment and is oppressive. Responding Party further objects as this interrogatory
9 seeks information not relevant to the subject matter of this lawsuit and not calculated to lead to the
10 discovery of admissible evidence in violation of the collateral source rule. This request is also an
11 invasion of Plaintiff's right to privacy. Subject to and notwithstanding the foregoing objections,
12 Responding Party responds as follows: *Star Magazine*, Published: February 14, 2011.

13 Discovery is ongoing and Responding Party reserves the right to supplement this response.

14 **SPECIAL INTERROGATORY NO. 31:**

15 IDENTIFY ALL PERSONS to whom you have apologized as alleged in paragraph 23 of
16 your COMPLAINT.

17 ///

18 ///

19 ///

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1 **RESPONSE TO SPECIAL INTERROGATORY NO. 31:**

2 Responding Party objects to this interrogatory as it is vague. Responding Party further
3 objects as this interrogatory is so broad and unlimited as to time and scope as to be an unwarranted
4 annoyance, embarrassment and is oppressive. Subject to and notwithstanding the foregoing
5 objections, Responding Party responds as follows: [REDACTED]

6 [REDACTED]

7 Discovery is ongoing and Responding Party reserves the right to supplement this response.

8 DATED: April 24, 2023

JEFF ANDERSON & ASSOCIATES, P.A.

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By: 

Michael Reck
Attorneys for Plaintiff JULIA MISLEY F/K/A
JULIA HOLCOMB

VERIFICATION (C.C.P. 446 AND 2015.5)

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I have read the foregoing PLAINTIFF JULIA MISLEY'S RESPONSES TO DEFENDANT STEVEN TYLER'S SPECIAL INTERROGATORIES, SET ONE and know its contents.

CHECK APPLICABLE PARAGRAPHS

I am a party to this action. The matters stated in the foregoing document are true of my own knowledge, except as to those matters which are stated on information and belief, and as to those matters, I believe them to be true.

I am an officer a partner a of

a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason.

I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

The matters stated in the foregoing document are true of my own knowledge, except as to those matters which are stated on information and belief, and as to those matters, I believe them to be true.

I am one of the attorneys for a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed on (date) at California.

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

JULIA MISLEY F/K/A JULIA HOLCOMB Type or Print Name

Julia Misley Signature

PROOF OF SERVICE CCP 101.3a(3) Revised 5 1 88

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of State of California. I am over the age of 18 and not a party to the within action; my business address is

On (date) **I served the foregoing document described as on in this action

by placing the true copies thereof enclosed in sealed envelopes addressed as stated on the attached mailing list; by placing the original a true copy thereof enclosed in sealed envelopes addressed as follows:

BY MAIL

I deposited such envelope in the mail at California. The envelope was mailed with postage thereon fully prepaid.

As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day, with postage thereon fully prepaid at California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

Executed on (date) at California.

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

SEE ATTACHED PROOF OF SERVICE

Type or Print Name

Signature

*(BY MAIL. SIGNATURE MUST BE OF PERSON DEPOSITING ENVELOPE IN MAIL SLOT, BOX OR BAG) **FOR PERSONAL SERVICE. SIGNATURE MUST BE THAT OF MESSENGER)

ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NO: 209,895 NAME: MICHAEL RECK, ESQ. FIRM NAME: JEFF ANDERSON & ASSOCIATES, P.A. STREET ADDRESS: 12011 SAN VICENTE BLVD., STE 700 CITY: LOS ANGELES STATE: CA ZIP CODE: 90049 TELEPHONE NO.: 310-357-2425 FAX NO.: 651-297-6543 E-MAIL ADDRESS: mreck@andersonadvocates.com ATTORNEY FOR (name): Plaintiff Julia Misley F/K/A Julia Holcomb	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 825 MAPLE AVE MAILING ADDRESS: SAME CITY AND ZIP CODE: TORRANCE 90503 BRANCH NAME: TORRANCE COURTHOUSE	CASE NUMBER: 22TRCV01604
PLAINTIFF/PETITIONER: JULIA MISLEY, formerly known as JULIA DEFENDANT/RESPONDENT: STEVEN VICTOR TALLARICO A/K/A STEVEN TYLER	JUDICIAL OFFICER: Hon. Gary Y. Tanaka
PROOF OF ELECTRONIC SERVICE	DEPARTMENT: B

1. I am at least 18 years old.
 - a. My residence or business address is (*specify*):
 12011 SAN VICENTE BLVD.
 STE 700
 LOS ANGELES, CA 90049
 - b. My electronic service address is (*specify*):
 KRYSTAL.PAZANTI@ANDERSONADVOCATES.COM

2. I electronically served the following documents (*exact titles*):
 PLAINTIFF JULIA MISLEY'S RESPONSE TO DEFENDANT STEVEN TYLER'S SPECIAL INTERROGATORIES, SET ONE

The documents served are listed in an attachment. (*Form POS-050(D)/EF5-050(D) may be used for this purpose.*)

3. I electronically served the documents listed in 2 as follows:
 - a. Name of person served: SHAWN HOLLEY
 On behalf of (*name or names of parties represented, if person served is an attorney*):
 DEFENDANT STEVEN TYLER
 - b. Electronic service address of person served :
 SHOLLEY@KWIKHLAW.COM
 - c. On (*date*): 4/24/2023

The documents listed in item 2 were served electronically on the persons and in the manner described in an attachment.
 (*Form POS-050(P)/EF5-050(P) may be used for this purpose.*)

Date: 4/24/2023

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

KRYSTAL PAZANTI

 (TYPE OR PRINT NAME OF DECLARANT)



 (SIGNATURE OF DECLARANT)

EXHIBIT 7

JEFF ANDERSON & ASSOCIATES PA
12011 San Vicente Boulevard, Suite 700
Los Angeles, California 90049
Telephone: 310.357.2425
Facsimile: 651.297.6543

1 Michael Reck, State Bar No. 209895
mreck@andersonadvocates.com
2 **JEFF ANDERSON & ASSOCIATES PA**
12011 San Vicente Boulevard, Suite 700
3 Los Angeles, California 90049
Tel: 310-357-2425
4 Fax: 651-297-6543

5 Attorneys for Plaintiff JULIA MISLEY

6 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
7 **FOR THE COUNTY OF LOS ANGELES – TORRANCE COURTHOUSE**

8 This Matter Relates to:) Case No.: 22TRCV01604
9)
10 JULIA MISLEY, formerly known as JULIA)
HOLCOMB, an individual,) Assigned to Hon. Gary Y. Tanaka, Dept. B
11)
Plaintiff,) **PLAINTIFF JULIA MISLEY’S**
12) **RESPONSE DEFENDANT STEVEN**
vs.) **TYLER’S FORM INTERROGATORIES,**
13) **SET ONE**
14 STEVEN VICTOR TALLARICO A/K/A STEVEN)
TYLER, an individual; and DOES 2 through DOE)
50, inclusive,) Action Filed: December 27, 2022
15) Trial Date: None Set
Defendant)

16
17 **PROPOUNDING PARTY:** DEFENDANT STEVEN VICTOR TALLARICO A/K/A TYLER
18 **RESPONDING PARTY:** PLAINTIFF JULIA MISLEY F/K/A JULIA HOLCOMB
19 **SET:** ONE

20
21 Plaintiff Julia Misley (hereinafter, “Plaintiff” or “Responding Party”) hereby responds to
22 Defendant Steven Tyler’s (hereinafter, “Defendant” or “Propounding Party”) Form interrogatories,
23 Set One, as follows:
24 ///

25 **PRELIMINARY STATEMENT AND GENERAL OBJECTIONS**

26 The following RESPONSE TO FORM INTERROGATORIES are made solely for the
27 purpose of this action. Any document or information supplies in RESPONSE TO FORM
28 INTERROGATORY is subject to all objections as to competence, relevance, materiality, propriety

1 and admissibility, and to any and all other objections on any ground that would require the exclusion
2 of any information or document or thing, or portion thereof, if such document or thing were offered
3 in evidence, all of which objections and grounds are expressly reserved and may be interposed at
4 the time of trial.

5 This preliminary statement is incorporated into each and every one of the following
6 responses to FORM INTERROGATORIES.

7 **RESPONSES TO DEFENDANT'S FORM INTERROGATORIES, SET ONE**

8 **FORM INTERROGATORY NO. 1.1:**

9 State the name, **ADDRESS**, telephone number, and relationship to you of each **PERSON**
10 who prepared or assisted in the preparation of the responses to these interrogatories.

11 **RESPONSE TO FORM INTERROGATORY TO NO. 1.1:**

12 Responding Party objects to this interrogatory to the extent that it seeks information
13 protected by the attorney-client privilege and the attorney work product doctrine. Subject to and
14 notwithstanding the foregoing objections, Responding Party responds as follows: **Julia Holcomb**
15 **Misley**, c/o Jeff Anderson & Associates, P.A., 12011 San Vicente Blvd, Suite 700, Los Angeles,
16 CA 90049, (949) 919-5630; **Attorney Jeffrey Anderson**, Jeff Anderson & Associates, P.A., 12011
17 San Vicente Blvd, Suite 700, Los Angeles, CA 90049, (949) 919-5630.

18 Discovery is ongoing and Responding Party reserves the right to supplement this response
19 ..

20 **FORM INTERROGATORY NO. 2.1:**

21 State:

22 (a) your name;

23 (b) every name you have used in the past; and

24 (c) the dates you used each name.

25 **RESPONSE TO FORM INTERROGATORY NO. 2.1:**

26 Responding Party objects to this interrogatory as it vague, overly broad, and unduly
27 burdensome as to time and scope and intended to harass and annoy the Responding Party. Subject
28 to and notwithstanding the foregoing objections, Responding Party responds as follows:

- 1 (a) Julia Rene Misley;
2 (b) Julia Rene Holcomb; and
3 (c) Julia Rene Holcomb; 1957-1981.

4 Discovery is ongoing and Responding Party reserves the right to supplement this response.

5 **FORM INTERROGATORY NO. 2.2:**

6 State the date and place of your birth.

7 **RESPONSE TO FORM INTERROGATORY NO. 2.2:**

8 Responding Party objects to this interrogatory as it is overly broad and unduly
9 burdensome and not calculated to lead to the discovery of admissible evidence. Subject to and
10 notwithstanding the foregoing objections, Responding Party responds as follows: October 1,
11 1957; Portland, OR.

12 Discovery is ongoing and Responding Party reserves the right to supplement this response.

13 **FORM INTERROGATORY NO. 2.3:**

14 At the time of the **INCIDENT**, did you have a driver's license? If so, state:

- 15 (a) The state or other issuing entity;
16 (b) The license number and type;
17 (c) The date of issuance; and
18 (d) All restrictions.

19 **RESPONSE TO FORM INTERROGATORY NO. 2.3:**

20 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
21 burdensome and not calculated to lead to the discovery of admissible evidence. Subject to and
22 notwithstanding the foregoing objections, Responding Party responds as follows: No.

23 Discovery is ongoing and Responding Party reserves the right to supplement this response.

24 **FORM INTERROGATORY NO. 2.4:**

25 At the time of the **INCIDENT**, did you have any other permit or license for the operation
26 of a motor vehicle? If so, state:

- 27 (a) the state or other issuing entity;
28 (b) the license number and type;

1 (c) the date of issuance; and

2 (f) **ADDRESS** means the street address, including the city, (d) all restrictions.

3 **RESPONSE TO FORM INTERROGATORY NO. 2.4:**

4 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
5 burdensome and not calculated to lead to the discovery of admissible evidence. Subject to and
6 notwithstanding the foregoing objections, Responding Party responds as follows: No.

7 Discovery is ongoing and Responding Party reserves the right to supplement this response.

8 **FORM INTERROGATORY NO. 2.5:**

9 State:

10 (a) your present residence **ADDRESS**;

11 (b) your residence **ADDRESSES** for the past five years; and

12 (c) the dates you lived at each **ADDRESS**.

13 **RESPONSE TO FORM INTERROGATORY NO. 2.5:**

14 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
15 burdensome. Subject to and notwithstanding the foregoing objections, Responding Party responds
16 as follows:

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 Discovery is ongoing and Responding Party reserves the right to supplement this response.

21 **FORM INTERROGATORY NO. 2.6:**

22 State:

23 (a) the name, **ADDRESS**, and telephone number of your present employer or place of
24 self-employment; and

25 (b) the name, **ADDRESS**, dates of employment, job title, and nature of work for each
26 employer or self-employment you have had from five years before the **INCIDENT** until today.

27 **RESPONSE TO FORM INTERROGATORY NO. 2.6:**

28 Responding Party objects to this interrogatory as it is vague, overly broad and unduly

1 burdensome as to time and scope and not reasonably calculated to lead to the discovery of admissible
2 evidence. Responding Party further objects as this interrogatory is not relevant to this litigation as it
3 seeks information which does not concern events, conditions or matters relating to the alleged
4 actionable conduct underlying this lawsuit. Subject to and notwithstanding the foregoing objections,

5 Responding Party responds as follows:

6 (a) Plaintiff is not currently employed.

7 (b) Classic Studios:

- 8 • 1832 NE Broadway, Portland, OR 97232.
- 9 • Approximately 1977-1979.
- 10 • Photography Assistant.
- 11 • Assisted photographer in taking photos.

The Holland House

- 12 • 1900 Molalla Ave, Oregon City, OR 97045
- 13 • Approximately 1979-1981
- 14 • Server
- 15 • Served food and drinks.

Butterfield's

- 16 • Portland, OR
- 17 • Approximately 1981
- 18 • Server
- 19 • Served food and drinks.

Steak and Ale

- 20 • Oklahoma City, OK
- 21 • Approximately 1981-1982
- 22 • Server
- 23 • Served food and drinks.

The Bountiful Basket Gift Shop

- 24 • Ulysses, KS
- 25 • Approximately 1986-1990
- 26 • Owner
- 27 • Sold gifts and collectables.

Victoria Faire

- 28 • Hurricane, WV
- Approximately 1990-1991
- Owner
- Sold gifts and collectables.

Discovery is ongoing and Responding Party reserves the right to supplement this response.

FORM INTERROGATORY NO. 2.7:

State:

1 (a) the name and ADDRESS of each school or other academic or vocational
2 institution you have attended, beginning with high school;

3 (b) the dates you attended.

4 (c) the highest grade level you have completed; and

5 (d) the degrees received.

6 **RESPONSE TO FORM INTERROGATORY NO. 2.7:**

7 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
8 burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

9 Responding Party further objects as this interrogatory is not relevant to this litigation as it seeks
10 information which does not concern events, conditions or matters relating to the alleged
11 actionable conduct underlying this lawsuit. Subject to and notwithstanding the foregoing
12 objections, Responding Party responds as follows: Milwaukie High School, 2301 SE Willard St.,
13 Milwaukie, OR 97222, from on or about 1972; Oregon City High School, 19761 S Beaver Creek
14 Rd, Oregon City, OR 97045, from on or about 1972-1974; Clackamas Community College, 7738
15 SE Harmony Rd. Milwaukie, OR 97222, from on or about 1979-1981; University of Central
16 Oklahoma, 100 N University Dr., Edmond, OK 73034, from on or about 1981-1982; University
17 of Houston, 3700 Cullen Blvd., Houston, TX 77204, on or about 2014, Bachelor of Fine Arts,
18 Minor in Art History; Houston Baptist University, 7502 Fondren Rd., Houston, TX 77074, from
19 on or about 2014-2016, Master of Fine Arts.

20 Discovery is ongoing and Responding Party reserves the right to supplement this response.

21 **FORM INTERROGATORY NO. 2.8:**

22 Have you ever been convicted of a felony? If so, for conviction state:

23 (a) The city and state where you were convicted;

24 (b) The date of conviction;

25 (c) The offense; and

26 (d) The court and case number.

27 **RESPONSE TO FORM INTERROGATORY NO. 2.8:**

28 Responding Party objects to this interrogatory as it is vague, overly broad and unduly

1 burdensome. Subject to and notwithstanding the foregoing objections, Responding Party responds
2 as follows: No.

3 Discovery is ongoing and Responding Party reserves the right to supplement this response.

4 **FORM INTERROGATORY NO. 2.9:**

5 Can you speak English with ease? If not, what language and dialect do you normally use?

6 **RESPONSE TO FORM INTERROGATORY NO. 2.9:**

7 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
8 burdensome. Subject to and notwithstanding the foregoing objections, Responding Party responds
9 as follows: Yes.

10 Discovery is ongoing and Responding Party reserves the right to supplement this response.

11 **FORM INTERROGATORY NO. 2.10:**

12 Can you read and write English with ease? If not, what language and dialect do you normally
13 use?

14 **RESPONSE TO FORM INTERROGATORY NO. 2.10:**

15 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
16 burdensome. Subject to and notwithstanding the foregoing objections, Responding Party responds
17 as follows: Yes.

18 Discovery is ongoing and Responding Party reserves the right to supplement this response.

19 **FORM INTERROGATORY NO. 2.11:**

20 At the time of the INCIDENT were you acting as an agent or employee for any PERSON?

21 If so, state:

22 (a) The name, ADDRESS, and telephone number of that PERSON; and

23 (b) A description of your duties.

24 **RESPONSE TO FORM INTERROGATORY NO. 2.11:**

25 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
26 burdensome. Subject to and notwithstanding the foregoing objections, Responding Party responds
27 as follows:

28 Unknown.

1 Discovery is ongoing and Responding Party reserves the right to supplement this response
2 . . .

3 **FORM INTERROGATORY NO. 2.12:**

4 At the time of the INCIDENT did you or any other person have any physical, emotional, or
5 mental disability or condition that may have contributed to the occurrence of the INCIDENT? If so,
6 for each person state:

- 7 (a) The name, ADDRESS and telephone number;
- 8 (b) The nature of the disability or condition; and
- 9 (c) The manner in which the disability or condition contributed to the occurrence of the
10 INCIDENT.

11 **RESPONSE TO FORM INTERROGATORY NO. 2.12:**

12 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
13 burdensome. Responding Party further objects as this interrogatory seeks information that is in
14 violation of a party's constitutionally protected right to privacy under Article 1, Section 1 of the
15 California Constitution. Additionally, Responding Party takes issue with the term "incident" as the
16 case in hand references an ongoing pattern of assault in multiple locations from on or about 1973 to
17 1975. Subject to and notwithstanding the foregoing objections, Responding Party responds as
18 follows:

19 Unknown.

20 Discovery is ongoing and Responding Party reserves the right to supplement this response.

21 **FORM INTERROGATORY NO. 2.13:**

22 Within 24 hours before the INCIDENT did you or any person involved in the INCIDENT
23 use or take any of the following substances: alcoholic beverage, marijuana, or other drug or
24 medication of any kind (prescription or not)? If so, for each person state:

- 25 (a) the name, ADDRESS, and telephone number;
- 26 (b) the nature or description of each substance;
- 27 (c) the quantity of each substance used or taken;
- 28 (d) the date and time of day when each substance was used or taken;

- 1 (e) the ADDRESS where each substance was used or taken;
- 2 (f) the name, ADDRESS, and telephone number of each person who was present when
- 3 each substance was used or taken; and
- 4 (g) the name, ADDRESS, and telephone number of any HEALTH CARE PROVIDER who
- 5 prescribed or furnished the substance and the condition for which it was prescribed or furnished.

6 **RESPONSE TO FORM INTERROGATORY NO. 2.13:**

7 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
8 burdensome as to time and scope. Responding Party further objects as this interrogatory seeks
9 information that is in violation of a party’s constitutionally protected right to privacy under Article
10 1, Section 1 of the California Constitution. Additionally, Responding Party takes issue with the term
11 “incident” as the case in hand references an ongoing pattern of assault in multiple locations from on
12 or about 1973 to 1975. Subject to and notwithstanding the foregoing objections, Responding Party
13 responds as follows: Upon information and belief, Plaintiff believes Defendant ingested and was
14 under the influence of a variety of drugs and alcohol at multiple times during many of the sexual
15 assaults from on or about 1973 to 1975. Defendant or Defendant’s agents plied Plaintiff with various
16 drugs and alcohol while she was a minor from on or about 1973 to 1975.

17 Discovery is ongoing and Responding Party reserves the right to supplement this response.

18 **FORM INTERROGATORY NO. 6.1:**

19 Do you attribute any physical, mental, or emotional injuries to the **INCIDENT?** (*If your*
20 *answer is “no,” do not answer interrogatories 6.2 through 6.7).*

21 **RESPONSE TO FORM INTERROGATORY NO. 6.1:**

22 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
23 burdensome. Additionally, Responding Party takes issue with the term “incident” as the case in hand
24 references an ongoing pattern of assault in multiple locations from on or about 1973 to 1975. Subject
25 to and notwithstanding the foregoing objections, Responding Party responds as follows: Plaintiff
26 developed migraines as a teenager. Plaintiff has also experienced embarrassment, anxiety, fear,
27 nightmares, flashbacks of the abuse, shame, symptoms of Post Traumatic Stress Disorder, guilt, loss
28 of enjoyment of life and emotional distress. Responding Party reserves the right to supplement this

1 response.

2 **FORM INTERROGATORY NO. 6.2:**

3 Identify each injury you attribute to the **INCIDENT** and the area of your body affected.

4 **RESPONSE TO FORM INTERROGATORY NO. 6.2:**

5 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
6 burdensome. Responding Party further objects as this interrogatory seeks a legal conclusion.
7 Additionally, Responding Party takes issue with the term “incident” as the case in hand references
8 an ongoing pattern of assault in multiple locations from on or about 1973 to 1975. Subject to and
9 notwithstanding the foregoing objections, Responding Party responds as follows: Plaintiff was
10 sexually assaulted by Defendant upon various parts of her body and genitals from on or about 1973
11 to 1975 and various physical manifestations of emotional distress and Post Traumatic Stress
12 Disorder.

13 Discovery is ongoing and Responding Party reserves the right to supplement this response.

14 **FORM INTERROGATORY NO. 6.3:**

15 Do you still have any complaints that you attribute to the **INCIDENT**?

16 (a) a description.

17 (b) whether the complaint is subsiding, remaining the same, or becoming worse; and

18 (c) the frequency and duration.

19 **RESPONSE TO FORM INTERROGATORY NO. 6.3:**

20 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
21 burdensome. Additionally, Responding Party takes issue with the term “incident” as the case in hand
22 references an ongoing pattern of assault in multiple locations from on or about 1973 to 1975. Subject
23 to and notwithstanding the foregoing objections,
24 Responding Party responds as follows: Plaintiff continues to experience shame, embarrassment,
25 guilt, anxiety and fear.

26 Discovery is ongoing and Responding Party reserves the right to supplement this response.

27 **FORM INTERROGATORY NO. 6.4:**

28 Did you receive any consultation or examination (except from expert witnesses covered

1 by Code of Civil Procedure sections 2034.210–2034.310) or treatment from a HEALTH CARE
2 PROVIDER for any injury you attribute to the INCIDENT? If so, for each HEALTH CARE
3 PROVIDER state:

- 4 (a) the name, ADDRESS, and telephone number;
- 5 (b) the type of consultation, examination, or treatment provided;
- 6 (c) the dates you received consultation, examination, or treatment; and
- 7 (d) the charges to date.

8 **RESPONSE TO FORM INTERROGATORY NO. 6.4:**

9 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
10 burdensome. Additionally, Responding Party takes issue with the term “incident” as the case in hand
11 references an ongoing pattern of assault in multiple locations from on or about 1973 to 1975. Subject
12 to and notwithstanding the foregoing objections, Responding Party responds as follows: No.

13 Discovery is ongoing and Responding Party reserves the right to supplement this response.

14 **FORM INTERROGATORY NO. 6.5:**

15 Have you taken any medication, prescribed or not, as a result of injuries that you attribute
16 to the INCIDENT? If so, for each medication state:

- 17 (a) the name;
- 18 (b) the PERSON who prescribed or furnished it;
- 19 (c) the date it was prescribed or furnished;
- 20 (d) the dates you began and stopped taking it; and
- 21 (e) the cost to date.

22 **RESPONSE TO FORM INTERROGATORY NO. 6.5:**

23 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
24 burdensome. Responding Party further objects as this interrogatory seeks information that is in
25 violation of a party’s constitutionally protected right to privacy under Article 1, Section 1 of the
26 California Constitution. Additionally, Responding Party takes issue with the term “incident” as the
27 case in hand references an ongoing pattern of assault in multiple locations from on or about 1973 to
28 1975. Subject to and notwithstanding the foregoing objections, Responding Party responds as

1 follows:

2 Unknown.

3 Discovery is ongoing and Responding Party reserves the right to supplement this response.

4 **FORM INTERROGATORY NO. 6.6:**

5 Are there any other medical services necessitated by the injuries that you attribute to the
6 INCIDENT that were not previously listed (for example, ambulance, nursing, prosthetics)? If so,
7 for each service state:

8 (a) the nature;

9 (b) the date;

10 (c) the cost; and

11 (d) the name, ADDRESS and telephone number of each provider.

12 **RESPONSE TO FORM INTERROGATORY NO. 6.6:**

13 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
14 burdensome. Responding Party further objects as this interrogatory seeks information that is in
15 violation of a party's constitutionally protected right to privacy under Article 1, Section 1 of the
16 California Constitution. Additionally, Responding Party takes issue with the term "incident" as the
17 case in hand references an ongoing pattern of assault in multiple locations from on or about 1973 to
18 1975. Subject to and notwithstanding the foregoing objections, Responding Party responds as
19 follows:

20 Unknown.

21 Discovery is ongoing and Responding Party reserves the right to supplement this response.

22 **FORM INTERROGATORY NO. 6.7:**

23 Has any HEALTH CARE PROVIDER advised you that you may require future or
24 additional treatment for any injuries that you attribute to the INCIDENT? If so, for each injury state:

25 (a) The Name and ADDRESS of each HEALTH CARE PROVIDER;

26 (b) The complaints for which the treatment was advised; and

27 (c) The nature, duration and estimated cost of the treatment.

28 **RESPONSE TO FORM INTERROGATORY NO. 6.7:**

1 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
2 burdensome as to time and scope. Responding Party further objects as this interrogatory seeks
3 information that is in violation of a party's constitutionally protected right to privacy under Article
4 1, Section 1 of the California Constitution. Additionally, Responding Party takes issue with the term
5 "incident" as the case in hand references an ongoing pattern of assault in multiple locations from on
6 or about 1973 to 1975. Subject to and notwithstanding the foregoing objections, Responding Party
7 responds as follows:

8 Unknown.

9 Discovery is ongoing and Responding Party reserves the right to supplement this response.

10 **FORM INTERROGATORY NO. 7.1:**

11 Do you attribute any loss of or damage to a vehicle or other property to the INCIDENT? If
12 so, for each item of property:

- 13 (a) Describe the property;
- 14 (b) Describe the nature and location of the damage to the property;
- 15 (c) State the amount of damage you are claiming for each; and
- 16 (d) If the property was sold, state the name, ADDRESS and telephone number of the seller,
17 the date of the sale, and the sale price.

18 **RESPONSE TO FORM INTERROGATORY NO. 7.1:**

19 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
20 burdensome and not calculated to lead to the discovery of admissible evidence. Additionally,
21 Responding Party takes issue with the term "incident" as the case in hand references an ongoing
22 pattern of assault in multiple locations from on or about 1973 to 1975. Subject to and
23 notwithstanding the foregoing objections, Responding Party responds as follows:

24 No.

25 Discovery is ongoing and Responding Party reserves the right to supplement this response.

26 **FORM INTERROGATORY NO. 7.2:**

27 Has a written estimate or evaluation been made for any item of property referred to in your
28 answer to the preceding interrogatory? If so, for each estimate or evaluation state:

1 (a) The name, ADDRESS, and telephone number of the PERSON who prepared it and the
2 date it was prepared;

3 (b) The name, ADDRESS, and telephone number of each PERSON who has a copy of it;
4 and

5 (c) The amount of damage stated.

6 **RESPONSE TO FORM INTERROGATORY NO. 7.2:**

7 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
8 burdensome and not calculated to lead to the discovery of admissible evidence. Subject to and
9 notwithstanding the foregoing objections, Responding Party responds as follows:

10 No.

11 Discovery is ongoing and Responding Party reserves the right to supplement this response.

12 **FORM INTERROGATORY NO. 7.3:**

13 Has any item of property referred to in your answer to interrogatory 7.1 been repaired?

14 If so, for each item state:

15 (a) the date repaired;

16 (b) a description of the repair;

17 (c) the repair cost;

18 (d) the name, ADDRESS, and telephone number of the PERSON who repaired it;

19 (e) the name, ADDRESS, and telephone number of the PERSON who paid for the repair.

20 **RESPONSE TO FORM INTERROGATORY NO. 7.3:**

21 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
22 burdensome and not calculated to lead to the discovery of admissible evidence. Subject to and
23 notwithstanding the foregoing objections, Responding Party responds as follows:

24 No.

25 Discovery is ongoing and Responding Party reserves the right to supplement this response.

26 **FORM INTERROGATORY NO. 8.1:**

27 Do you attribute any loss of income or earning capacity to the INCIDENT? (If your answer
28 is "no," do not answer interrogatories 8.2 through 8.8).

1 **RESPONSE TO FORM INTERROGATORY NO. 8.1:**

2 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
3 burdensome. Additionally, Responding Party takes issue with the term “incident” as the case in hand
4 references an ongoing pattern of assault in multiple locations from on or about 1973 to 1975. Subject
5 to and notwithstanding the foregoing objections, Responding Party responds as follows:

6 Unknown.

7 Discovery is ongoing and Responding Party reserves the right to supplement this response.

8 **FORM INTERROGATORY NO. 9.1:**

9 Are there any other damages that you attribute to the INCIDENT? If so, for each item of
10 damage state:

- 11 (a) The nature;
- 12 (b) The date or occurred;
- 13 (c) The amount; and
- 14 (d) The name, ADDRESS and telephone number of each PERSON to whom an obligation
15 was incurred.

16 **RESPONSE TO FORM INTERROGATORY NO. 9.1:**

17 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
18 burdensome. Additionally, Responding Party takes issue with the term “incident” as the case in hand
19 references an ongoing pattern of assault in multiple locations from on or about 1973 to 1975. Subject
20 to and notwithstanding the foregoing objections, Responding Party responds as follows: After
21 Plaintiff returned to Portland, OR in approximately December 1976, she was a broken and wounded
22 person. She returned with no formal high school education, no money and significant emotional and
23 mental harm. Plaintiff reconnected with her faith and through that, obtained her GED and enrolled
24 in college while rebuilding her life. She eventually met her husband in approximately 1980, married
25 and started a family. For the next 31 years, Plaintiff devoted her life to her family and volunteering.
26 She left her time with Defendant in the past and did not speak of him or to him since 1978. In
27 approximately 2011, Plaintiff’s son was browsing the internet and discovered a Star Magazine
28 article published on February 14, 2011, that named Plaintiff as the subject of chapter six in

1 Defendants book “*Does the noise in my head bother you.*” Because of this chapter, the media soon
2 linked Plaintiff’s name to the details and thrust Plaintiff into the spotlight without her consent.
3 Plaintiff was forced to disclose her past to her children, relatives and friends, a past she had preferred
4 to leave behind. Plaintiff was made defend herself for the actions she was coerced into while under
5 the guardianship of Defendant.

6 Discovery is ongoing and Responding Party reserves the right to supplement this response.

7 **FORM INTERROGATORY NO. 10.1:**

8 At any time before the INCIDENT did you have complaints or injuries that involved the
9 same part of your body claimed to have been injured in the INCIDENT? If so, for each state:

- 10 (a) A description of the complaint or injury;
11 (b) The dates it began and ended; and
12 (c) The name, ADDRESS and telephone number of each HEALTH CARE PROVIDER
13 whom you consulted or who examined or treated you.

14 **RESPONSE TO FORM INTERROGATORY NO. 10.1:**

15 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
16 burdensome. Additionally, Responding Party takes issue with the term “incident” as the case in hand
17 references an ongoing pattern of assault in multiple locations from on or about 1973 to 1975. Subject
18 to and notwithstanding the foregoing objections, Responding Party responds as follows: No.

19 Discovery is ongoing and Responding Party reserves the right to supplement this response.

20 **FORM INTERROGATORY NO. 10.2:**

21 List all physical, mental and emotional disabilities you had immediately before the
22 INCIDENT. (You may omit mental or emotional disabilities unless you attribute any mental or
23 emotional injury to the INCIDENT.)

24 **RESPONSE TO FORM INTERROGATORY NO. 10.2:**

25 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
26 burdensome. Additionally, Responding Party takes issue with the term “incident” as the case in hand
27 references an ongoing pattern of assault in multiple locations from on or about 1973 to 1975. Subject
28 to and notwithstanding the foregoing objections, Responding Party responds as follows:

1 None.

2 Discovery is ongoing and Responding Party reserves the right to supplement this response.

3 **FORM INTERROGATORY NO. 10.3:**

4 At any time after the INCIDENT, did you sustain injuries of the kind for which you are
5 now claiming damages? If so, for each incident giving rise to an injury state:

6 (a) the date and the place it occurred;

7 (b) the name, ADDRESS, and telephone number of any other PERSON involved;

8 (c) the nature of any injuries you sustained;

9 (d) the name, ADDRESS, and telephone number of each(e) the nature of the treatment
10 and its duration.

11 **RESPONSE TO FORM INTERROGATORY NO. 10.3:**

12 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
13 burdensome. Additionally, Responding Party takes issue with the term “incident” as the case in hand
14 references an ongoing pattern of assault in multiple locations from on or about 1973 to 1975. Subject
15 to and notwithstanding the foregoing objections, Responding Party responds as follows: No.

16 Discovery is ongoing and Responding Party reserves the right to supplement this response.

17 **FORM INTERROGATORY NO. 11.1:**

18 Except for this action, in the past 10 years have you filed an action or made a written
19 claim or demand for compensation for your personal injuries? If so, for each action, claim, or
20 demand state:

21 (a) the date, time, and place and location (closest street Address or intersection) of the
22 INCIDENT giving rise to the action, claim, or demand;

23 (b) the name, ADDRESS, and telephone number of each PERSON against whom the
24 claim or demand was made, or the action filed;

25 (c) the court, names of the parties, and case number of any action filed;

26 (d) the name, ADDRESS, and telephone number of any attorney representing you;

27 (e) whether the claim or action has been resolved or is pending; and

28 (f) a description of the injury.

1 **RESPONSE TO FORM INTERROGATORY NO. 11.1:**

2 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
3 burdensome. Responding Party further objects as this interrogatory seeks information subject to the
4 attorney-client and attorney work-product doctrine. Subject to and notwithstanding the foregoing
5 objections, Responding Party responds as follows: No.

6 Discovery is ongoing and Responding Party reserves the right to supplement this response.

7 **FORM INTERROGATORY NO. 11.2:**

8 In the past 10 years have you made a written claim or demand for workers' compensation
9 benefits? If so, for each claim or demand state:

10 (a) the date, time, and place of the INCIDENT giving rise to the claim;

11 (b) the name, ADDRESS, and telephone number of your employer at the time of the
12 injury;

13 (c) the name, ADDRESS, and telephone number of the workers' compensation
14 insurer and the claim number;

15 (d) the period of time during which you received workers' compensation benefits;

16 (e) a description of the injury;

17 (f) the name, ADDRESS, and telephone number of any HEALTH CARE PROVIDER
18 who provided services; and (g) the case number at the Workers' Compensation Appeals Board.

19 **RESPONSE TO FORM INTERROGATORY NO. 11.2:**

20 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
21 burdensome. Responding Party further objects as this interrogatory seeks information subject to the
22 attorney-client and attorney work-product doctrine. Additionally, Responding Party takes issue with
23 the term "incident" as the case in hand references an ongoing pattern of assault in multiple locations
24 from on or about 1973 to 1975. Subject to and notwithstanding the foregoing objections, Responding
25 Party responds as follows: No.

26 Discovery is ongoing and Responding Party reserves the right to supplement this response.

27 **FORM INTERROGATORY NO. 12.1:**

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

1 (a) who witnessed the INCIDENT or the events occurring immediately before or after
2 the INCIDENT;

3 (b) who made any statement at the scene of the INCIDENT;

4 (c) who heard any statements made about the INCIDENT by any individual at the scene;
5 and

6 (d) who YOU OR ANYONE ACTING ON YOUR BEHALF claim has knowledge of
7 the INCIDENT (except for expert witnesses covered by Code of Civil Procedure section 2034).

8 **RESPONSE TO FORM INTERROGATORY NO. 12.1:**

9 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
10 burdensome. Additionally, Responding Party takes issue with the term “incident” as the case in hand
11 references an ongoing pattern of assault in multiple locations from on or about 1973 to 1975. Subject
12 to and notwithstanding the foregoing objections, Responding Party responds as follows: Steven

13 Tallarico, [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]
28 [REDACTED]

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]

8 Discovery is ongoing and Responding Party reserves the right to supplement this response.

9 **FORM INTERROGATORY NO. 12.2:**

10 Have YOU OR ANYONE ACTING ON YOUR BEHALF interviewed any individual
11 concerning the INCIDENT? If so, for each individual state:

- 12 (a) the name, ADDRESS, and telephone number of the individual interviewed;
- 13 (b) the date of the interview; and
- 14 (c) the name, ADDRESS, and telephone number of the PERSON who conducted the
15 interview.

16 **RESPONSE TO FORM INTERROGATORY NO. 12.2:**

17 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
18 burdensome. Responding Party further objects as this interrogatory seeks information subject to
19 the attorney-client and attorney work-product doctrine. Additionally, Responding Party takes
20 issue with the term “incident” as the case in hand references an ongoing pattern of assault in
21 multiple locations from on or about 1973 to 1975. Subject to and notwithstanding the foregoing
22 objections, Responding Party responds as follows: Yes. [REDACTED]

23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

26 Discovery is ongoing and Responding Party reserves the right to supplement this
27 response.

28 **FORM INTERROGATORY NO. 12.3:**

1 Have YOU OR ANYONE ACTING ON YOUR BEHALF obtained a written or recorded
2 statement from any individual concerning the INCIDENT? If so, for each statement state:

3 (a) the name, ADDRESS, and telephone number of the individual from whom the
4 statement was obtained;

5 (b) the name, ADDRESS, and telephone number of the individual who obtained the
6 statement;

7 (c) the date the statement was obtained; and

8 (d) the name, ADDRESS, and telephone number of each PERSON who has the original
9 statement or a copy.

10 **RESPONSE TO FORM INTERROGATORY NO. 12.3:**

11 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
12 burdensome. Responding Party further objects as this interrogatory seeks information subject to
13 the attorney-client and attorney work-product doctrine. Additionally, Responding Party takes
14 issue with the term “incident” as the case in hand references an ongoing pattern of assault in
15 multiple locations from on or about 1973 to 1975. Subject to and notwithstanding the foregoing
16 objections, Responding Party responds as follows: No.

17 Discovery is ongoing and Responding Party reserves the right to supplement this
18 response.

19 **FORM INTERROGATORY NO. 12.4:**

20 Do YOU OR ANYONE ACTING ON YOUR BEHALF know of any photographs,
21 films, or videotapes depicting any place, object, or individual concerning the INCIDENT or
22 plaintiff's injuries? If so, state:

23 (a) the number of photographs or feet of film or videotape;

24 (b) the places, objects, or persons photographed, filmed, or videotaped;

25 (c) the date the photographs, films, or videotapes were taken;

26 (d) the name, ADDRESS, and telephone number of the

27 (e) the name, ADDRESS, and telephone number of each PERSON who has the original
28 or a copy of the photographs, films, or videotapes.

1 **RESPONSE TO FORM INTERROGATORY NO.12.4:**

2 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
3 burdensome. Responding Party further objects as this interrogatory requires Plaintiff to speculate
4 as to what documents might be responsive. Additionally, Responding Party takes issue with the
5 phrase “incident” as the case in hand references an ongoing pattern of assaults in multiple
6 locations from on or about 1973 to 1975. Plaintiff also objects to this request on the grounds that
7 it calls for documents readily available from defendant. Subject to and notwithstanding the
8 foregoing objections, Responding Party responds as follows:

9 Unknown.

10 Discovery is ongoing and Responding Party reserves the right to supplement this
11 response.

12 **FORM INTERROGATORY NO. 12.5:**

13 Do YOU OR ANYONE ACTING ON YOUR BEHALF know of any diagram,
14 reproduction, or model of any place or thing (except for items developed by expert witnesses
15 covered by Code of Civil Procedure sections 2034.210–2034.310) concerning the INCIDENT?

16 If so, for each item state:

- 17 (a) the type (i.e., diagram, reproduction, or model);
- 18 (b) the subject matter; and
- 19 (c) the name, ADDRESS, and telephone number of each PERSON who has it.

20 **RESPONSE TO FORM INTERROGATORY NO. 12.5:**

21 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
22 burdensome. Additionally, Responding Party takes issue with the phrase “incident” as the case in
23 hand references an ongoing pattern of assaults in multiple locations from on or about 1973 to
24 1975. Subject to and notwithstanding the foregoing objections, Responding Party responds as
25 follows: No.

26 Discovery is ongoing and Responding Party reserves the right to supplement this
27 response.

28 **FORM INTERROGATORY NO. 12.6:**

- 1 Was a report made by any PERSON concerning the INCIDENT? If so, state:
- 2 (a) the name, title, identification number, and employer of the PERSON who made the
- 3 report;
- 4 (b) the date and type of report made;
- 5 (c) the name, ADDRESS, and telephone number of the PERSON for whom the report
- 6 was made; and
- 7 (d) the name, ADDRESS, and telephone number of each PERSON who has the original
- 8 or a copy of the report.

9 **RESPONSE TO FORM INTERROGATORY NO. 12.6:**

10 Responding Party objects to this interrogatory as it is vague, overly broad and unduly

11 burdensome. Additionally, Responding Party takes issue with the phrase “incident” as the case in

12 hand references an ongoing pattern of assaults in multiple locations from on or about 1973 to

13 1975. Subject to and notwithstanding the foregoing objections, Responding Party responds as

14 follows: Plaintiff is unaware of any report made concerning Plaintiff and Defendant.

15 Discovery is ongoing and Responding Party reserves the right to supplement this

16 response.

17 **FORM INTERROGATORY NO. 12.7**

18 Have YOU OR ANYONE ACTING ON YOUR BEHALF inspected the scene of the

19 INCIDENT? If so, for each inspection state: (a) the name, ADDRESS, and telephone number

20 of the individual making the inspection (except for expert witnesses covered by Code of Civil

21 Procedure, Sections 2034.210–2034.310); and (b) the date of the inspection.

22 **RESPONSE TO FORM INTERROGATORY NO. 12.7:**

23 Responding Party objects to this interrogatory as it is vague, overly broad and unduly

24 burdensome. Responding Party further objects as this interrogatory seeks information subject to

25 the attorney-client and attorney work-product doctrine. Additionally, Responding Party takes

26 issue with the phrase “incident” as the case in hand references an ongoing pattern of assaults in

27 multiple locations from on or about 1973 to 1975. Subject to and notwithstanding the foregoing

28 objections, Responding Party responds as follows: No.

1 Discovery is ongoing and Responding Party reserves the right to supplement this
2 response.

3 **FORM INTERROGATORY NO. 13.1**

4 Have YOU OR ANYONE ACTING ON YOUR BEHALF conducted surveillance of
5 any individual involved in the INCIDENT or any party to this action? If so, for each surveillance
6 state:

7 (a) the name, ADDRESS, and telephone number of the individual or party;

8 (b) the time, date, and place of the surveillance.

9 (c) the name, ADDRESS, and telephone number of the individual who conducted the
10 surveillance; and

11 (d) the name, ADDRESS, and telephone number of each PERSON who has the original
12 or a copy of any surveillance photograph, film, or videotape.

13 **RESPONSE TO FORM INTERROGATORY NO. 13.1:**

14 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
15 burdensome. Responding Party further objects as this interrogatory seeks information subject to
16 the attorney-client and attorney work-product doctrine. Additionally, Responding Party takes
17 issue with the phrase "incident" as the case in hand references an ongoing pattern of assaults in
18 multiple locations from on or about 1973 to 1975. Subject to and notwithstanding the foregoing
19 objections, Responding Party responds as follows: No.

20 Discovery is ongoing and Responding Party reserves the right to supplement this
21 response.

22 **FORM INTERROGATORY NO. 13.2:**

23 Has a written report been prepared on the surveillance? If so, for each written report state:

24 (a) the title;

25 (b) the date;

26 (c) the name, ADDRESS, and telephone number of the individual who prepared the
27 report; and

28 (d) the name, ADDRESS, and telephone number of each PERSON who has the original

1 or a copy.

2 **RESPONSE TO FORM INTERROGATORY NO.13.2:**

3 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
4 burdensome. Responding Party further objects as this interrogatory seeks information subject to
5 the attorney-client and attorney work-product doctrine. Subject to and notwithstanding the
6 foregoing objections, Responding Party responds as follows: No.

7 Discovery is ongoing and Responding Party reserves the right to supplement this
8 response.

9 **FORM INTERROGATORY NO. 14.1:**

10 Do YOU OR ANYONE ACTING ON YOUR BEHALF contend that any PERSON
11 involved in the INCIDENT violated any statute, ordinance, or regulation and that the violation
12 was a legal (proximate) cause of the INCIDENT? If so, identify the name, ADDRESS, and
13 telephone number of each PERSON and the statute, ordinance, or regulation that was violated.

14 **RESPONSE TO FORM INTERROGATORY NO. 14.1:**

15 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
16 burdensome. Additionally, Responding Party takes issue with the phrase “incident” as the case in
17 hand references an ongoing pattern of assaults in multiple locations from on or about 1973 to
18 1975. Subject to and notwithstanding the foregoing objections, Responding Party responds as
19 follows:

20 Yes, Plaintiff believes that the California Penal Code 261.5 and others was violated.

21 Discovery is ongoing and Responding Party reserves the right to supplement this
22 response.

23 **FORM INTERROGATORY NO. 14.2:**

24 Was any PERSON cited or charged with a violation of any statute, ordinance, or
25 regulation as a result of this INCIDENT? If so, for each PERSON state:

- 26 (a) the name, ADDRESS, and telephone number of the PERSON;
27 (b) the statute, ordinance, or regulation allegedly violated;
28 (c) whether the PERSON entered a plea in response to the citation or charge and, if so,

1 the plea entered; and

2 (d) the name and ADDRESS of the court or administrative agency, names of the parties,
3 and case number.

4 **RESPONSE TO FORM INTERROGATORY NO.14.2:**

5 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
6 burdensome. Additionally, Responding Party takes issue with the phrase “incident” as the case in
7 hand references an ongoing pattern of assaults in multiple locations from on or about 1973 to
8 1975. Subject to and notwithstanding the foregoing objections, Responding Party responds as
9 follows: Plaintiff is unaware of any person being cited or charged with a violation of any statute,
10 ordinance or regulation as a result.

11 Discovery is ongoing and Responding Party reserves the right to supplement this
12 response.

13 **FORM INTERROGATORY NO. 17.1:**

14 Is your response to each request for admission served with these interrogatories an
15 unqualified admission? If not, for each response that is not an unqualified admission:

16 (a) state the number of the request;

17 (b) state all facts upon which you base your response;

18 (c) state the names, ADDRESSES, and telephone numbers of all PERSONS who have
19 knowledge of those facts; and

20 (d) identify all DOCUMENTS and other tangible things that support your response and
21 state the name, ADDRESS, and telephone number of the PERSON who has each DOCUMENT
22 or thing.

23 **RESPONSE TO FORM INTERROGATORY NO.17.1:**

24 Responding Party objects to this interrogatory as it is vague, overly broad and unduly
25 burdensome. Subject to and notwithstanding the foregoing objections, Responding Party
26 responds as follows:

27 **Request for Admission No. 1:**

28 Yes.

1 **Request for Admission No. 2:**

2 Yes.

3 **Request for Admission No. 3:**

4 Yes.

5 **Request for Admission No. 4:**

6 Yes.

7 **Request for Admission No. 5:**

8 No.

9 **Request for Admission No. 6:**

10 Yes.

11 **Request for Admission No. 7:**

12 Yes.

13 **Request for Admission No. 8:**

14 Yes.

15 **Request for Admission No. 9:**

16 Plaintiff objects to this request as the request is not reasonably calculated to lead to the
17 discovery of relevant, admissible evidence and violates CCP § 2017.220.

18 **Request for Admission No. 10:**

19 Yes

20 **Request for Admission No. 11:**

21 No

22 **Request for Admission No. 12:**

23 Yes

24 **Request for Admission No. 13:**

25 No

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Request for Admission No. 14:

No

Discovery is ongoing and Responding Party reserves the right to supplement this response.

DATED: April 24, 2023

JEFF ANDERSON & ASSOCIATES, P.A.

Mike Reck

By:

Michael Reck
*Attorneys for Plaintiff JULIA MISLEY F/K/A
JULIA HOLCOMB*

VERIFICATION (C.C.P. 446 AND 2015.5)

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I have read the foregoing PLAINTIFF JULIA MISLEY'S RESPONSES TO DEFENDANT STEVEN TYLER'S FORM INTERROGATORIES, SET ONE

and know its contents.

CHECK APPLICABLE PARAGRAPHS

I am a party to this action. The matters stated in the foregoing document are true of my own knowledge, except as to those matters which are stated on information and belief, and as to those matters, I believe them to be true.

I am an officer a partner a of

a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason.

I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

The matters stated in the foregoing document are true of my own knowledge, except as to those matters which are stated on information and belief, and as to those matters, I believe them to be true.

I am one of the attorneys for a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed on (date) at California.

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

JULIA MISLEY F/K/A JULIA HOLCOMB Type or Print Name

Julia Misley Signature

PROOF OF SERVICE CCP 1013a(3) Revised 5 1 88

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of State of California. I am over the age of 18 and not a party to the within action; my business address is

On (date) **I served the foregoing document described as on in this action

by placing the true copies thereof enclosed in sealed envelopes addressed as stated on the attached mailing list: by placing the original a true copy thereof enclosed in sealed envelopes addressed as follows:

BY MAIL

I deposited such envelope in the mail at California. The envelope was mailed with postage thereon fully prepaid.

As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day, with postage thereon fully prepaid at California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

Executed on (date) at California.

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

SEE ATTACHED PROOF OF SERVICE

Type or Print Name

Signature

*(BY MAIL. SIGNATURE MUST BE OF PERSON DEPOSITING ENVELOPE IN MAIL SLOT, BOX OR BAG) **FOR PERSONAL SERVICE. SIGNATURE MUST BE THAT OF MESSENGER)

ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NO: 209,895 NAME: MICHAEL RECK, ESQ. FIRM NAME: JEFF ANDERSON & ASSOCIATES, P.A. STREET ADDRESS: 12011 SAN VICENTE BLVD., STE 700 CITY: LOS ANGELES STATE: CA ZIP CODE: 90049 TELEPHONE NO.: 310-357-2425 FAX NO.: 651-297-6543 E-MAIL ADDRESS: mreck@andersonadvocates.com ATTORNEY FOR (name): Plaintiff Julia Misley F/K/A Julia Holcomb	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 825 MAPLE AVE MAILING ADDRESS: SAME CITY AND ZIP CODE: TORRANCE 90503 BRANCH NAME: TORRANCE COURTHOUSE	CASE NUMBER: 22TRCV01604
PLAINTIFF/PETITIONER: JULIA MISLEY, formerly known as JULIA DEFENDANT/RESPONDENT: STEVEN VICTOR TALLARICO A/K/A STEVEN TYLER	JUDICIAL OFFICER: Hon. Gary Y. Tanaka
PROOF OF ELECTRONIC SERVICE	DEPARTMENT: B

1. I am at least 18 years old.

- a. My residence or business address is (specify):
 12011 SAN VICENTE BLVD.
 STE 700
 LOS ANGELES, CA 90049
- b. My electronic service address is (specify):
 KRYSTAL.PAZANTI@ANDERSONADVOCATES.COM

2. I electronically served the following documents (exact titles):

PLAINTIFF JULIA MISLEY'S RESPONSE TO DEFENDANT STEVEN TYLER'S FORM INTERROGATORIES, SET ONE

The documents served are listed in an attachment. (Form POS-050(D)/EF5-050(D) may be used for this purpose.)

3. I electronically served the documents listed in 2 as follows:

- a. Name of person served: SHAWN HOLLEY
 On behalf of (name or names of parties represented, if person served is an attorney):
 DEFENDANT STEVEN TYLER
- b. Electronic service address of person served :
 SHOLLEY@KWIKHLAW.COM
- c. On (date): 4/24/2023

The documents listed in item 2 were served electronically on the persons and in the manner described in an attachment.
 (Form POS-050(P)/EF5-050(P) may be used for this purpose.)

Date: 4/24/2023

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

KRYSTAL PAZANTI

 (TYPE OR PRINT NAME OF DECLARANT)



 (SIGNATURE OF DECLARANT)

EXHIBIT 8

Aerosmith: Hard Rock's Down and Dirty Heroes

 [rollingstone.com/music/music-news/aerosmith-hard-rocks-down-and-dirty-heroes-99418](https://www.rollingstone.com/music/music-news/aerosmith-hard-rocks-down-and-dirty-heroes-99418)

August 26, 1976

Music

The latest band in heavy metal rock has a flair for getting loud and lewd, with an audience to match



Aerosmith backstage in 1976. *Fin Costello/Redferns/Getty Images*

It was almost like one of Cecil B. DeMille's great crowd scenes or footage from some rock festival film like *Woodstock* or *Monterey Pop*. They came staggering across the parking lot in the still, brackish Michigan dusk and advanced on Pontiac Stadium – one of those monstrous modern sports arenas – like a boozy army of hard hats whose intention it was to dismantle the place. They looked like hell. Nobody dresses up for concerts anymore.

They gobbled reds and chug-a-lugged beer. Some fell on their faces and tumbled down the hill. The oldest among them could not have been much more than 18 years old, but there wasn't an illusion left in the crowd. You had to get close enough to see the reds of their eyes to realize that this was a generation whose rock & roll rituals had been raised up out of the ashes of Altamont rather than the bright muck of Woodstock.

[The 100 Greatest Artists of All Time: Aerosmith](#)

Steven Tyler, the lead singer of Aerosmith, looks like Carly Simon's kid sister and carries himself the way the pope probably would if he were 24 years old and had grown up in Yonkers. Onstage, he becomes the most Beardsleyesque character on either side of the Atlantic today. He has a voice that makes Alice Cooper sound like Vic Damone.

Tyler has a fetish for scarves. They trail from his nubile form like unraveled mummy wrappings and from the microphone stand that he flails like a staff as he prowls about the stage, bawling and spitting like an irritable enfant terrible. The total effect is a caricature of a caricature, but Aerosmith's legions eat it up and regard Tyler's fashions the ultimate in déclassé dishabille. And while the costumery is clearly his own, he owes the best part of his image to Mick Jagger.

"I can remember a few years ago when I was just another kid from Yonkers going to Madison Square Garden to see the Stones and looking down and saying, 'Wow, man, is that tiny little figure ... all the way down there ... really Mick ... Jagger?'" Tyler says this with an ingenuousness which remains in the cheap seats. Yet Aerosmith's fame is already such that countless other kids must gaze down from those same bleachers of the faithful, dreaming, of Steven Tyler ...

In order to see this top new heavy-metal group in their natural element, I had been told I'd have to travel out into the industrial areas surrounding the fabled Motor City, where rock & roll animals, whose fathers labor on assembly lines, have been known to eat opening acts for an appetizer. Aerosmith began to gather their constituency in tank towns like Pontiac while playing second bill to bigger bands. But now that they've sold more than 4 million records, they're headlining in all the large halls from coast to coast.

David Krebs, one of their managers, readily admits that he built Aerosmith's word-of-mouth reputation by seeing to it that they invariably opened for headliners suffering from tired blood – bands that would be sitting ducks for the sucker punch of Aerosmith's youthful energy. "The first time I let this band out of the box I got burned," says the swarthy, perennially smirking Krebs. "I let my booking agent talk me into having them open for the Mahavishnu Orchestra – which, on a scale from zero to a hundred, turned out to be a definite minus. But we learned to play our market so that Aerosmith opened for acts that were slightly on the downslide – bands whose audience we could cop. Even if we didn't blow them off the stage every time, we could at least count on some to buy an Aerosmith album."

Spinning Gold Puts the Magic of the Infamous 1970s Casablanca Records and its Visionary Founder Neil Bogart on the Big Screen

Presented By hero films

Don't miss Spinning Gold, coming to theaters on March 31st, 2023.

Aerosmith was relatively unknown beyond a small cult following in Boston when Clive Davis signed them to a contract with Columbia Records in 1972 after attending their second gig at New York's notorious watering hole, Max's Kansas City. Their first LP, *Aerosmith*, released the following year, wasn't any great chartbuster (although nine months later the single, "Dream On," became a hit in Boston and among the Max's crowd, and a national hit almost three years after that). *Get Your Wings*, their second album, didn't do much better. By 1974, as a result of a year of solid touring, the group achieved broad success. Without the aid of even their record company, the third Aerosmith album, *Toys in the Attic*, took off for the platinum plateau, dragging the other two along as well. By the end of 1975, the group had sold nearly 3 million albums; the release of *Rocks* this spring pushed their total sales close to 5 million. The Aerosmith catalog now sells between 75,000 and 100,000 units per week; *Toys in the Attic* is over 1.5 million, *Rocks* and *Aerosmith* are closing in.

The 500 Greatest Albums of All Time: *Rocks*

Aerosmith has become the powerhouse act Krebs and his partner, Steve Leber, had attempted to create a couple years earlier with another cult band, the New York Dolls. The Dolls were also a second-generation caricature of the Rolling Stones, whose lead singer, David Johansen, was as smitten with Jagger as Tyler. But the Dolls never managed to reach beyond their audience of New York glitter tots. Krebs, who had had high hopes for the Dolls, claims his mistake was allowing them to be overhyped – Krebs second-guesses another reason why Aerosmith succeeded where the Dolls had failed:

"The Dolls made the mistake of getting too heavy into the unisex trip, while Aerosmith had the good sense to go in the direction of the Rolling Stones of the Seventies, which is more difficult to pin down."

Considering that David Krebs built this band in the arena rather than through press hype or radio airplay, it's possible he's having second thoughts tonight. From the press box, he looks like a young Count Dracula gazing down on an army of potential heretics and a billboard-size electronic scoreboard flashing *Foghat Loves Pontiac* in grateful response to the thunder pounding up from below. But, vowing to be more selective in choosing Aerosmith's opening acts (lest his Trojan horse strategy of using second billing backfire the next time some off-the-wall contenders like Foghat have a good night), for the moment at least, Krebs need not fret. The ovation for Foghat seems nothing more than the tribute afforded a good club fight compared to the thunder that's beginning to build before the crowd even suspects the headliners are onstage.

Meanwhile, behind the big black curtain, guitarist Joe Perry, toking a last-minute cigarette, plugs in his guitar like a greasemonkey getting ready to tune a hot carburetor and Steve Tyler limbers up like an acrobat in black pajamas. It's pandemonium out there – you'd think Muhammad Ali (who may now be our last yardstick of superstardom) had started his long stately walk from the dressing room to the ring. . . .

When Aerosmith's set finally begins with "Mama Kin," a hard rocker from their first album, it's almost immediately apparent that the predictably criminal acoustics of the oversized hall hardly matter. The faithful, at least, seem wholly satisfied with watching the tiny firefly figure of Steven he's-even-cuter-when-he's-mad Tyler point an accusing finger and damn the dumb technology of the adult world, screaming, "Wot's wrong with the fuckin' P.A.?"

Tyler throws a very impressive temper tantrum in an accent that vacillates between Yonkers and Liverpool. Perhaps it reminds them of Jagger – the debt to Stones-style rock is especially apparent during "Train Kept a Rollin'," a tune picked up from the Yardbirds, the very band that replaced the Stones at the Crawdaddy Club back in '63.

The 100 Greatest Singers of All Time: Steven Tyler

It's brain-damage music, all right. Yet the stoned audience reacts with a passion that surpasses the reverence shown the lordly Stones. . . . For, if Jagger is an icon one step removed from Elvis and just two jumps from Jesus, Steve Tyler is infinitely more accessible, performing an anthem called "Lord of the Thighs" – a title whose allusion to William Golding's chilling parable about children who revert to heathenism suddenly seems perceptive, gazing out at the hungry faces of Aerosmith's children straining up at the stage. In terms of rock rabble-rousing, it's a moment worthy of early Alice Cooper.

Steven Tyler's first brush with celebrity came when he made the front page of his local paper in Yonkers for being busted in a High School Confidential pot raid:

"An undercover nark infiltrated my high school ceramics class, believe it or not. The scumbag sold lids of grass to me and some other kids, then busted us for possession."

Tyler and Joe Perry make their combined struggles sound like a first-person rewrite of *Catcher in the Rye* as told by "Johnny," the mixed-up-punk-protagonist of their fourth album, *Rocks*.

Tyler had been living this schitzy existence, going to school in Yonkers all week and commuting on the weekends up to Sunapee, New Hampshire, where he played drums in the house band of a small resort hotel owned by his parents. At the same time he was doubling on drums and vocals – a frustrating combination even for a formidable character like Buddy Miles – in his first rock & roll band, Chain Reaction. Somehow they managed to land a gig in Southampton, playing at this ritzy resort. It was heavy, Tyler claims, "a real Mrs. Robinson scene," with all these rich older women coming on to the band but never delivering because their escorts were always around. . . . Tyler put up with it as long as he could, but he eventually freaked out, leaping over his drum set and attempting to strangle the lead guitarist onstage. They practically had to pry his fingers off the axe-man's jugular as a room full of Southampton matrons gawked in horror.

ROLLING STONE

AEROSMITH

Platinum Punks
and Paradise Gained

REAGAN'S MILLIONS

Inside the Candidate's
Closet Cabinet There's
a 20th-Century Fox
By Howard Kohn
and Lowell Bergman

The Many Faces of

ISABELLE ADJANI

By Jonathan Cott

THE HOMECOMING

An Artful Dodger
Faces the Democratic Convention
By Donald R. Katz

Extra! Rock & Roll Riot!
**ZZ TOP AT THE BATTLE
OF NEW ORLEANS**
By Chet Flippo

RS220 Photograph by Annie Leibovitz

“Needless to say, that was the end of Chain Reaction,” Tyler chuckles fiendishly – remembering that first demonstration of his penchant for onstage dramatics. “I ended up thumbing my way back to Sunapee, where I finally heard this band Joe Perry and Tom Hamilton were in,” he says of his first meeting with Aerosmith’s lead guitarist and bass player. Perry and Hamilton suggested that he join forces with them and try being a frontman

instead of knocking himself out by doubling on vocals and drums. So Tyler called on his old buddy Joey Kramer (who had been kicked out of school with him in that drug raid) and a guy called Ray Tabano, who was replaced by Brad Whitford, the current rhythm guitarist.

Joe Perry also has tales of teenage angst to tell. To begin with, Joe was one of those kids who couldn't get along anywhere: he hated school and had no friends. All he wanted to do, when he was in high school in Massachusetts, was stay in his room and practice on his Sears Silvertone guitar – the kind of instrument your parents buy when they really hope you'll turn out to be a doctor or a lawyer instead of a rock & roller.

Perry's parents were worried about him – he didn't seem to be going anywhere – so they tried to salvage his future by sticking him in a snooty prep school. “. . . That's where I really learned to hate the system, 'cause the faculty was always hassling me to cut my hair and yelling every time I picked up my guitar.”

Joe Perry is a very self-aware, second-generation rock & roll star, an archetypical, darkly glowering lead guitarist. Very cool, doesn't say much. But they still kid him about his recent “dude phase.” They say he acted like a typical white punk on dope let loose in Gucci's. . . .

Perry dropped out of prep school a month before graduation, got a job and saved enough bread to buy his first halfway decent guitar. The only semiprofessional musician in either family is Tyler's father, who teaches music at Roosevelt High School in Yonkers, the school Tyler and Kramer had been expelled from. The elder Tyler still plays piano in the house band at his resort hotel on weekends.

But the sleepy burg of Sunapee was no place to launch a rock & roll career, so after Aerosmith was formed, they moved to Boston, the nearest big city. “We all lived together in this basement dump and ate peanut butter and jelly sandwiches for breakfast, lunch and supper. . . .”

Aerosmith's bass player, Tom Hamilton, shakes his lanky blond rock & roll hair, chuckling at the memory. “Man, we played every damned high-school auditorium in Boston and New Hampshire,” he recalls. “We'd set up and play for 50 people, anybody who'd listen. That's why it has to be a kick to play a place like that stadium tonight – 85,000 fuckin' people!”

The whole band has to laugh when they remember how they thought they had it made after Clive Davis signed them. “We thought: ‘This is it – signed by Clive! Aerosmith has arrived!’” Steven Tyler remembers, miming wide-eyed wonder, but looking more like a startled racoon.

The grueling reality of touring constantly after being signed by Columbia is best expressed in Tyler's line, “I ain't seen daylight since I started this band.”

Everyone who's been around Aerosmith will tell you that Tyler is the tough taskmaster who drives the band. They say he drove poor Joey Kramer bananas in the beginning. Joey was lazy, Steven thought, and so he kept bitching until Kramer, who has always been easygoing, finally gave in and became a very respectable drummer of the ashcan school. The others settled down too. Joe Perry, Brad Whitford and Tom Hamilton all got married. Hamilton has always been laid back – always the shy, lanky kid, just playing his bass.

But there's nothing laid back about Tyler, who will tell you that he might like to get married someday, but that his main old lady, for the moment at least, is that bitch called rock & roll. Well – Julia Holcomb is always nearby, trailing in her wistfully towering way off his arm like a scarf – but Steven Tyler is wedded to his career and image 24 hours a day.

There is something almost sad about the way he can't seem to crawl out of his skin – how the bitch won't seem to let go for a minute. Most rock star types, after the initial buzz of fame wears off, become rather retiring individuals. But Tyler's fantasies follow him right out in public: whisking into an airport lounge in a floppy black cavalier hat, a long leather coat thrown over the same cockamamie haberdashery he flaunts onstage – and, of course, a pair of shades just in case you don't notice that this is someone famous who is trying not to be noticed. . . .

“It still excites me to think about headlining Madison Square Garden,” Tyler says, anticipating the next date on this 58-city tour. “I mean, there's still something special – still a magic about that place. We actually did play there last year, but that was when we were still the opening act for Black Sabbath. . . . Wait till you see us at the Garden. Then you'll see what we're really about.”

Neal Smith still has streamers of blond hair down to his bony elbows and stands seven feet off the sidewalk in his stacked heels; Mike Bruce, with his Roll-over-Beethoven mane and the build of a varsity quarterback, would be almost as hard to miss – yet no one at the backstage door seems to recognize Alice Cooper's former drummer and rhythm guitarist as the old security guard scans the guest list like W.C. Fields playing a house dick, making sure these two freaks are legit. When they finally get backstage and Smith tries to cop a beer out of Aerosmith's dressing room he is politely told that he will have to drink in the “courtesy room.” Like Rodney Dangerfield, former rock & roll stars just don't get no respect.

“Everybody get back and give the boys plenty-a room,” bellows Aerosmith's tour director, a burly Irishman called Kelly who looks like Jimmy Breslin in a Beatle wig.

The procession that follows can only be compared in terms of pomp and lordly chutzpah to certain papal displays. First to emerge from the dressing room are Joe Perry and Brad Whitford, the grave greasemonkey guitarists, toting their instruments like carbines; then, boyishly befuddled Tom Hamilton, followed by Joey Kramer, the stocky sweathog drummer, jauntily clicking his sticks in a “V” for victory like some amiable “Fonz” of a gang fighter.

But, as usual, the whole point of this display is Steven Tyler bringing up the rear, a little ragamuffin dressed up for some school pageant, complete with cape and plumed musketeer hat and the fair maiden Julia on his arm.

After you've witnessed the procession from the dressing room to the stage, the show seems almost anticlimactic.

Onstage, Joe Perry bends over his axe in the hernia posture of heavy-metal guitarists everywhere, sending out shrill electric shivers to the faithful while Tyler plays to the bleachers of their premature depravity and humps Tom Hamilton. The Veronica Lake bass player gives him a look like he wants to hit him with his pocketbook.

As the set progresses Tyler begins to remind me of a kid I once saw wreaking incredible havoc in a crowded department store. He couldn't have weighed more than 90 pounds, but he fought off two burly managers and a store detective when they tried to nab him for shoplifting a Led Zeppelin album in the record department. He led them on a wild chase – screaming like a banshee and knocking merchandise off counters – take that Burt Bacharach! – as they chased him down the aisles. You had to root for that kid if you have any life left in you at all. . . .

“Like it or not, I have to hand it to your boy,” I finally admit to David Krebs, who is watching from the wings like a proud papa, looking a lot happier than he did two nights ago in Michigan. “He's the mutant bastard offspring of Jagger and Iggy Stooze.”

“Only he's better than both of them,” smirks Krebs with the graceless overconfidence of a man who doesn't yet know he would be lucky to be only half right.

When I ask Neal Smith what his opinion is, he stares out into the audience for a long time. They must look a lot younger to him than they did a mere two years and a whole rock & roll lifetime ago when Alice's “Billion Dollar Babies” tour sold out this same hall.

“Well . . . they're . . . different,” Smith admits with more than a trace of sour grapes and maybe just an inkling of the deflating realization that he may already be on the wrong side of the solid-platinum generation gap.

Onstage, they'd come across like mutant apparitions, but now they look more like a high school basketball team celebrating a big victory as relatives from Yonkers and Sunapee swarm the fluorescent dressing room. Tom Hamilton is blushing as buxom ladies plant sloppy kisses on his cheeks, while men in leisure suits line up to shake Steve Tyler's hand.

Meanwhile, one nice lady is introducing herself to perfect strangers with, “Hi, I'm Mrs. Kramer. Do you know my son Joey. . . the drummer?”

Several days later David Krebs lays a startling piece of information on me, and I finally begin to get an inkling of what Aerosmith is really about: “This is the last big tour. After this one there won’t be much more touring.”

The news is surprising, to say the least, considering that this is a band that is just starting to make it big.

“Correction,” says Krebs, “they’re *already* big, and they just don’t need to kill themselves anymore. . . . So, next year, their touring is going to be severely limited – so they can concentrate on putting out product.”

That’s when it finally begins to dawn on me that this is what they used to call a Horatio Alger story.

Only, with improved retirement benefits.

This is story is from the August 26, 1976 issue of Rolling Stone.

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EXHIBIT 9

August 9, 1976 • 50¢

People

weekly

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**Aerosmith &
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**The selling of
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PETER FALK

**Columbo's
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aerosmith50years.com



Steve Tyler of Aerosmith smolders when dubbed the poor man's Mick Jagger. Are four platinum LPs poor?

AEROSMITH'S HEAVY METTLE HAS MADE STEVE TYLER AMERICA'S HOTTEST HOME-GROWN ROCKER

U.S. rock groups have softened in the '70s, from early Crosby, Stills et al to the Eagles, forcing heavy-metal masochists to look to Mother Country bands like Led Zeppelin and Deep Purple for their 110-decibel abuse. Well, as Steve Tyler of Aerosmith sings, "No More No More." America has come home to Tyler's indigenous Boston-based outfit and made Steve, its razor-thin lead singer and strutter extraordinaire, the first Yankee crowned head of heavy metal. Aerosmith's new *Rocks* is its fourth back-to-back platinum (million-seller) LP, and this summer the group will be testing the construction of halls and stadiums across the country, hammering its elemental, unrelenting music into as many as 80,000 crania a night.

His pout appears cloned from Carly Simons', and his clingy, stretchy stage getups have made Tyler a thoroughly satisfying Jagger-surrogate for his many teenybopper fans who average about half his age, 28. But Steve fumes

when critics compare him to Super Mick or kiss off the group as more pedestrian than punkishly streetwise. "We're the best, that's it," he proclaims. "Four platinums, the biggest concerts in the country, and these simps and gimps still only say 'Jaggeresque Tyler, Tyleresque Jagger.' Screw 'em all."

Tyler acknowledges he unwittingly has become a sex symbol but protests, "I don't go onstage with a banana in my pants. As good as I am," says Tyler, perhaps correctly, "I'm nothing without my band." Aerosmith is propelled by Tom Hamilton's bass, the muscular drumming of Joey Kramer and stinging guitar runs by Joe Perry and Brad Whitford.

Steve moves for his money onstage (the pedometer attached to his leg clicks off four miles per gig) and ends the night "an android—no ups, no downs, no nothing. The road breeds depression and insanity," he states unequivocally. "It's involuntary in me,



Probably the only parents Steve doesn't frighten are his own. "My father still can't believe we make \$200,000 some gigs."

and I look at it with horror. But suddenly you're this irritable superstar bitch, flipping out over trivia, like do we get separate ice buckets for champagne backstage? Do we get limos with separate radio controls in the rear? I'm no prima donna. But if I don't cool down soon I will flip out in major ways.



Tyler generates rock fury and groupie-ish fanzies "Who'd want to face an audience of young boys?" he asks.

FOR A SONG



A Porsche's sexy but no match for Julia, 18, his lady of three years. "I've learned a lot," she says, "from this little guy."

I never had those emotions before. All you know on the road is that dialing 0 gets you room service, 8 is long distance and 9 is local calls. I woke up in my own home today, and I didn't know where I was."

He was, in fact, in his \$75,000 hideaway on Lake Sunapee, N.H., near where he summured as a kid. His parents, of Italian origin (Tyler changed his name), run a resort there, and as a teenager Steve played society music on drums with his father (on piano) and his uncle (sax). Off season, he lived in the New York suburb of Yon-

kers, spending nights alone in his room with his radio and rock dreams: "I used to hear the Everly Brothers or Beach Boys and say, 'God, I want to do that.'" His chance came sooner than expected in spite of an 11th-grade pot bust, set up, he says, "by a narc posing as a classmate in ceramics. He sold me a nickel bag, brought a hookah to my house, and then one day came back with the handcuffs." In 1970, two groups later, he wound up with Aerosmith.

Humorous and high-strung Tyler unwinds in the endless summer camp serenity around the lake with his gentle lady Julia Holcomb, 18, and at the wheel of his Porsche 911S or his 195-hp speedboat. As a lingering side effect

of the road, he rarely crashes before sunrise. "What I really want," he whispers, on his creaking dock, as the rising sun illuminates a cold thick fog rolling over the glassy lake toward the White Mountain pines, "is my own kids. I send monthly checks to two foster kids in Asia. I never met them, but I get pictures and progress reports. I know they're getting milk and food and clothes, and that makes me feel good. I've done music for a lot of other people to get off on, and now, man, I want a piece of that happiness too."

JIM JEROME

EXHIBIT 10

"A story of passion, politics, death, and love... This is the kind of book that fills your dreams for weeks."
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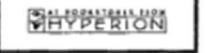


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—KIRKUS REVIEWS

"A compelling read."
—BOSTON SUNDAY GLOBE



October 12, 1997

THE NEW YORK TIMES BOOK REVIEW

Best Sellers

This Week	Fiction	Last Week	On List	This Week	Nonfiction	Last Week	On List
1	FLOOD TIDE , by Clive Cussler. (Simon & Schuster, \$24.) Dirk Pitt in pursuit of a notorious Chinese smuggler at work in the United States.	3	2	1	THE ROYALS , by Kitty Kelley. (Warner, \$27.) Gossips about the private lives of members of the House of Windsor.	1	2
2	COLD MOUNTAIN , by Charles Frazier. (Atlantic Monthly, \$24.) A wounded Confederate soldier journeys home toward the end of the Civil War.	1	14	2	ANGELA'S ASHES , by Frank McCourt. (Scriner, \$22.95.) An account of the riot-ravaged 1910s, focusing on a crew of fishermen from Gloucester, Mass.	2	66
3	THE BEST LAID PLANS , by Sidney Sheldon. (Morrow, \$25.) The relationship between a power-hungry governor and a beautiful woman determined to wreak revenge.	2	4	3	THE MAN WHO LISTENS TO HORSES , by Monty Roberts. (Random House, \$23.) The memoirs of a professional horse trainer.	3	8
4	THE ANGEL OF DARKNESS , by Caleb Carr. (Random House, \$23.95.) Dr. Kravitz and his team pursue the kidnapper of a Spanish diplomat's child in 1897 Manhattan.	4	3	4	THE PERFECT STORM , by Sebastian Junger. (Horton, \$22.95.) An account of the 'perfect' storm of 1991, focusing on a crew of fishermen from Gloucester, Mass.	4	18
5	10 LB. PENALTY , by Dick Francis. (Putnam, \$24.95.) A politician's career is imperiled by actions taken by his enemies against his son, a sometime amateur jockey.		1	5	DIRTY JOKES AND BEER , by Drew Carey. (Hyperion, \$22.95.) Observations on his life and life in general by the comedian.		1
6	UNDERWORLD , by Don DeLillo. (Scriner, \$27.95.) From the Palo Verde to cyberspace, American life as lived by a man and woman during the past 24 years.	5	3	6	INTO THIN AIR , by Jon Krakauer. (Villard, \$24.95.) A journalist's account of his ascent of Mount Everest in 1996, the deadliest season in history.	6	23
7	TIMEQUAKE , by Kurt Vonnegut. (Putnam, \$22.95.) In 2001, the universe starts shrinking back in time — but decides to reverse itself when it reaches 1991.		1	7	CONVERSATIONS WITH GOD: Book 1 , by Neale Donald Walsch. (Putnam, \$19.95.) The author addresses questions of good and evil, guilt and sin. (T)	7	43
8	THE NOTEBOOK , by Nicholas Sparks. (Warner, \$19.95.) A World War II veteran meets an old flame.	7	51	8	BABYHOOD , by Paul Reiser. (Weisbach/Morrow, \$22.) The problems and pleasures of parenthood as perceived by the television star and comedian.	8	6
9	UNNATURAL EXPOSURE , by Patricia Cornwell. (Putnam, \$25.95.) Dr. Kay Scopus contends with a killer who uses a smallpox-like virus and cyberlogic tricks.	6	11	9	MINISTRY IN THE GARDEN OF EDEN AND EVE , by John Berendt. (Random House, \$23.) The mysterious death of a young man in Savannah, Ga. (T)	9	169
10	THE GOD OF SMALL THINGS , by Arundhati Roy. (Random House, \$23.) Death and secrets haunt a once-prosperous merchant family in contemporary India.	9	9	10	THE MILLIONAIRE NEXT DOOR , by Thomas J. Stanley and William D. Danko. (Longstreet, \$23.) An analysis of the lives of wealthy Americans discloses that they have seven characteristics in common. (T)	10	38
11	DEAD DEAD , by Kathy Reichs. (Scriner, \$24.) Dr. Temperance Brennan hunts a serial killer in Montreal.	10	5	11	DOGS NEVER LIE ABOUT LOVE , by Jeffrey Moss-Soloff. (Crown, \$24.) A psychoanalyst's reflections on the emotional lives of dogs.	11	2
12	NIGHT PASSAGE , by Robert B. Parker. (Putnam, \$21.95.) A discharged Los Angeles cop faces unexpected challenges as police chief in a small New England town.		1	12	WALK THIS WAY , by Aerosmith with Stephen Davis. (Avon, \$23.) The members of the rock-and-roll band recall their lives.		1
13	AMBER BEACH , by Elizabeth Lowell. (Avon, \$22.) A businesswoman on the trail of her favorite brother, who has vanished along with a fortune in stolen jewelry.		1	13	THE GIFT OF FEAR , by Gavin de Becker. (Little, Brown, \$23.95.) Intuitive signals that can protect us from becoming the victims of violence.		15
14	FLIN ISLAND , by Nelson DeMille. (Warner, \$25.) A detective probes the murder of a Long Island couple who may have been involved in germ warfare research.	12	19	14	YEARS OF RAGE , by John Walsh with Susan Schindler. (Pocket, \$24.) The host of "America's Most Wanted" recalls the agony he suffered following the kidnapping and murder of his young son.	14	2
15	SPECIAL DELIVERY , by Danielle Steel. (Delacorte, \$19.95.) Romance comes to a mature couple who disliked each other in earlier encounters.	8	14	15	THE BIBLE CODE , by Michael Drosnin. (Simon & Schuster, \$25.) A journalist contends that important events have been predicted in the Bible.	15	17
16	THE GRILLING SEASON , by Elaine Mott Davidson. (Doubleday, \$22.95.) A professional cook and amateur sleuth probes the murder of her ex-husband's girlfriend.		2				

Advice, How-to and Miscellaneous

1	MEN ARE FROM MARS, WOMEN ARE FROM VENUS , by John Gray. (HarperCollins, \$23.) Improving communication and relationships. (T)	1	211	3	SIMPLE ABUNDANCE , by Sarah Ban Breathnach. (Warner, \$17.95.) Advice for women seeking to improve the way they look at themselves. (T)	2	79
2	TEN STUPID THINGS MEN DO TO MESS UP THEIR LIVES , by Laura Scholinger. (Chiff Street/HarperCollins, \$24.) Advice from a family counselor. (T)	3	2	4	THE ZONE , by Barry Sears with Bill Lawren. (Regan Books/HarperCollins, \$23.) Diets to prevent disease and improve mental health. (T)	4	51

Rankings reflect sales figures for the week ending Sept. 27, at almost 4,600 bookstores plus wholesalers serving 50,000 other retailers (gift shops, department stores, newsstands, supermarkets), statistically weighted to represent sales in all such outlets nationwide. An asterisk (*) indicates that a book's sales are barely distinguishable from those of the book above. A dagger (†) indicates that some bookstores report receiving bulk orders for a book.

And Bear in Mind

(Editors' choices of other recent books of particular interest)

ALL AROUND ATLANTIS, by Deborah Eisenberg. (Farrar, Straus & Giroux, \$25.) Many of these spirited, powerful stories concern children, affluent and neglected, whose precocious perceptions curtail their power to articulate them.

THE BOOK OF FAMOUS IOWANS, by Douglas Bauer. (Holt, \$23.) A painful and, by design, redemptive novel whose hero explores the rage at his parents' betrayal that has dominated his life.

CALIFORNIA'S OVER, by Louis B. Juren. (Pantheon, \$24.) A satirical elegy for Hippodrome and the narcissistic hyperintensity of the 1970s, set in an innocent Marin County where mellowness grows as grass grows.

THE CLAIRVOYANT, by Marian Thurm. (Zoland, \$23.95.) An amusing novel with an amusing proposition: its title character, a psychic loose cannon who can't control what he sees, suffers from the resulting mystery deficit in his love life.

THE COMPLETE STORIES, by Bernard Malamud. (Farrar, Straus & Giroux, \$25.) The whole megillah is stories, from grim early tales of mercantile existence to complex bantering that ends in profound choices, all of them as Jewish as he knew how to make them.

EUROPE ADRIFT, by John Newhouse. (Pantheon, \$27.50.) A sagacious and experienced scholar and consultant sees a Europe adrift, led by leaders who won't lead or care, especially since German reunification tilted the balance eastward.

THE FABRIC OF REALITY: The Science of Parallel Universes — and Its Implications, by David Deutsch. (Allen Lane/Penguin, \$23.95.) A literary, redemptive argument that quantum theory describes how things really are, not just how they may be mathematically described.

HOW THE MIND WORKS, by Steven Pinker. (Horton, \$29.95.) There's no blank slate, this

M.I.T. psychologist believes; we are born with programmed learning modules, without which we'd founder occupationally, never acquiring impossible skills like talking and walking.

LEGENDS OF THE AMERICAN DESERT: Stories in the Greater Southwest, by Alex Shoumatoff. (Knopf, \$30.) A freshly, unkempt, beguiling omnium-gatherum that ranges from Mexico City to southern Colorado.

MEMOIRS OF A GEISHA, by Arthur Golden. (Knopf, \$25.) This first novel, a bold act of ventriloquism, takes as subject a Japanese woman born in the 1920s; her recollections are enriched with all sorts of colorful period detail.

PILGRIMS, by Elizabeth Gilbert. (Houghton Mifflin, \$22.) Chaucer is invoked in this lovely short-story collection, but its characters have little patience for long-windedness or spirituality; they are mostly down and out, and often very odd.

EXHIBIT 11

Write this Way: Aerosmith singer to write memoir

 [reuters.com/article/us-tyler/write-this-way-aerosmith-singer-to-write-memoir-idUSN0643906920080807](https://www.reuters.com/article/us-tyler/write-this-way-aerosmith-singer-to-write-memoir-idUSN0643906920080807)

People & Celebrities

August 6, 2008 5:35 PM Updated 15 years ago

By Reuters Staff

2 Min Read

Steven Tyler of the rock group Aerosmith mugs for a photographer as he arrives at the 2002 Billboard Music Awards show at the MGM Grand Garden Arena in Las Vegas, Nevada, December 9, 2002. REUTERS/ Steve Marcus

LOS ANGELES (Reuters) - Aerosmith lead singer Steven Tyler's life is so exciting that he's writing his second memoir in five years, according to media reports.

Ecco, an imprint of HarperCollins, has won an auction and will pay \$2 million to publish the book from Tyler, 60, Crain's New York Business reported on its Web site on Tuesday.

Tyler and his bandmates previously spilled the beans on their raucous lifestyle in the 2003 memoir "Walk This Way: The Autobiography of Aerosmith." It was co-written with Stephen Davis, famed for digging up the dirt on Led Zeppelin in "Hammer of the Gods."

An Ecco spokesman declined to comment, and a spokesman for Aerosmith said he had no information on the book deal.

Aerosmith, America's answer to the Rolling Stones, shot to fame in the 1970s with such tunes as "Walk This Way" and "Back in the Saddle." The band was known for its hard-partying lifestyle and drug use, and Tyler and guitarist Joe Perry earned the nickname the "Toxic Twins."

Tyler became an advocate for sober living in the last two decades, but in May he disclosed that he had gone to a rehab facility earlier that month because he needed "a safe environment to recuperate" following painful foot surgeries.

Reporting by Alex Dobuzinskis: Editing by Bob Tourtellotte and Dean Goodman

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EXHIBIT 12

Steven Tyler's Warp Speed Memoir

By Rob Sheffield

June 24, 2011

Calling Steven Tyler an incoherent loudmouth is like describing James Brown as a guy who moved around a lot. Tyler has devoted his improbably long musical career to testing the limits of incoherence, loudness and his mouth. From his 1970s glory days as the jive-talking lead singer of Aerosmith to his unlikely TV success as a judge on “American Idol,” he’s always delighted in babble for its own sake. In his words, he’s been “61 Highwayed and I did it my wayed; Little-Willie-Johned and been-here-and-goned; million-dollar riffed and Jimmy Cliffed; cotton-picked and Stevie Nick’d.” What he lacks in lucidity, which is just about everything, he makes up for with garrulous charm. As Laurence Sterne says of Yorick in “Tristram Shandy,” he has big sails but not an ounce of ballast.

So who goes to a rock star for ballast? His autobiography, “Does the Noise in My Head Bother You?,” chronicles one of the music world’s strangest careers, in an appropriately dazed tone. It ends up doing for Keith Richards’s memoir, “Life,” what Aerosmith originally did for the Rolling Stones: it’s faster, sleazier and pulpier, and somehow (as if just to prove it’s possible) makes even less sense. The book begins with Tyler as a kid growing up in Yonkers and the Bronx, sneaking off to the Village to watch beatniks (and do drugs). He gets together with Aerosmith to play the blues (and do drugs). Over the next 40 years, he leads Aerosmith through a whirlwind of “Behind the Music” adventures: groupies, dealers, countless stints in rehab, breakups, comebacks, great albums, terrible albums, even an album with Stonehenge on the cover.



Steven Tyler in 1997.
Stephanie Pfriendr/Corbis Outline

Tyler’s turbulently high-spirited cheer holds it all together, even when you don’t really believe a word he’s saying. He can’t stay on the same topic longer than a sentence or two, as he swerves from mystical hippie rambles to borscht belt jokes at warp speed. One story begins, “Early on in the band when I was still Jung and easily Freudened. . . .” Needless to say, the story has nothing to do with Jung, Freud or much of anything else. It’s hard to guess what the co-author, David Dalton, did, besides pour the coffee, since Tyler never slows down to get his stories straight. At one point, he talks about his 1987 hit “Dude (Looks Like a Lady)” and how it was inspired by meeting the band Mötley Crüe in 1991. (Or, as Tyler calls it, “1991, the year of the Dude.”) Sometimes he gets his own song titles wrong: he refers to the Aerosmith classic “Dream On” as “Game On,” while “Train Kept A-Rollin’ ” becomes “Shank After Rollin’ .”

All through the book, Tyler provides insights into the medical condition known as L.S.D., or “Lead Singer Disease” — it’s practically an Oliver Sacks-level investigation into L.S.D., from the perspective of a prize case study. Of course, Tyler sees it not as rampant egomania, but as an affliction that geniuses get from their less evolved band mates. To him, “L.S.D. is a not-much-talked-about syndrome defined in the Mondo Manual of Psychiatric Disorders as ‘bone-gnawing, spleen-curdling jealousy of the lead singer in a rock band on the part of other members of the band, erupting in violent blaspheming and tantrums by such members whenever the lead singer’s image appears on the cover of popular magazines.’”

The last time Tyler told his tale, in Aerosmith’s 1997 oral history, “Walk This Way,” there was a happy ending: sobriety, marriage, hit records. This time around, things are different. Aerosmith hasn’t recorded a hit song, much less a good one, in years. His recent solo single isn’t any good either. The marriage ended in divorce, and Tyler acknowledges that he was in the midst of a major drug relapse while putting the book together: “I was in the way-out-a-sphere and not really up to reading 20 fortune cookies, never mind 20 pages.” Not even he can feign much enthusiasm for the prospect of his solo career.

So it’s oddly touching that despite everything, through all the chaos, Tyler’s ego remains unkillable. “I wanted dreamy nubile girls to listen to my voice and cry,” he muses. “A thousand years after my death I fantasized that there’d be people in the outer galaxies listening to ‘Dream On’ and saying in hushed tones, ‘It’s *him*, the strange Immortal One!’ ” If the love of his life is his own voice, nobody can say the

man hasn't been faithful.

EXHIBIT 13

[HOME](#) > [NEWS](#) > [GENERAL NEWS](#)


Book Review: Steven Tyler's Autobiography Shapes Up to Be a Fun Ride

In "Does The Noise in My Head Bother You?: A Rock 'n' Roll Memoir," he dishes on his bromance with Joe Perry, \$20 million blown on drugs and the lady rocker who rejected him.

BY **ANDY LEWIS** MAY 3, 2011 11:56AM



The singer joined the judges panel of Fox's "American Idol" this season. TONY DURAN/FOX



Steven Tyler is a Rock Star — capital R, capital S. He understands that being a Rock Star is about more than just selling records. You have to live The Life, and if you write a memoir about The Life, certain conventions have to be respected — band fights have to be detailed, partying catalogued, hookups listed, regrets stated, a sensitive inner side revealed, redemption found — and because Tyler understands what it means to be a Rock Star, he delivers the goods in *Does the Noise in My Head Bother You?* Written with *Rolling Stone* founding editor **David Dalton** (*James Dean: The Mutant King*, *El Sid: Saint Vicious*, the forthcoming *Bob's Brain: Decoding Dylan*), Tyler's surprisingly insightful and entertaining voice brings the familiar contours of this story alive. It's not the most original rock memoir, but it is a fun read.

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Tyler was born Steven Tallarico in 1948 in the Bronx, N.Y. He had an ordinary childhood, or at least what passes for an ordinary childhood for a future rock star, though one surprising revelation is how outdoorsy he was as a kid. He spent every summer at his family's summer home in Sunapee, N.H. "I was a mountain boy, barefoot and wild," Tyler writes. "I'd come back after an afternoon of killing with my slingshot and Red Ryder BB gun with a string of blue jays tied to my belt."

But by 15, he was already getting high and already sure he wanted to be a rock star. People instantly made the **Mick Jagger** comparison (those lips didn't help), but Tyler reveals Janis Joplin as his idol (and the inspiration for the scarves he drapes around his mike stand).

The turning point in Tyler's life came when he saw **Joe Perry** and **Tom Hamilton** perform with their band at a show in the summer of 1969 in Sunapee. Tyler and Perry became fast friends, capping that first summer by attending Woodstock together. The next year, they formed a band, gaining notice on Boston's club circuit, but it was a gig at the legendary Max's Kansas City that landed them a record deal. Their third album, 1975's *Toys in the Attic*, vaulted them to superstardom.

Tyler's relationship with Perry — easily the most important and complicated of his adult life — is the emotional center of the book. Perry is his "polar" and "mutant" twin, the "cool" to his "sulphur sun beast,"

about Perry after his friend chose living with his girlfriend over rooming with Tyler.

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Drugs are the other constant. They are everywhere in the book: He gets high as a kid, he bonds with Perry over drugs, he keeps them hidden in a drum so he can have them onstage, he gets addicted to prescription painkillers after surgery. Tyler estimates he blew \$20 million on drugs: “I snorted my plane, I snorted my house.” He gets clean, he relapses, he gets clean again. He reels off the eight rehab centers where he’s been a patient, surely a contender for the all-time celebrity record.

The story of Aerosmith’s rise, fall and redemption is all here. Much of it is familiar from the band’s earlier authorized bio *Walk This Way* but told now from Tyler’s perspective. The most entertaining new story is about a woman who didn’t sleep with him: rocker **Joan Jett**. Tyler made a pass at her — or what amounts to a rock star’s pass — by showing up outside her hotel room buck naked one night. Jett blows him off with a riff on one of Aerosmith’s biggest hits: “I’m not into big 10-inch, honey.”

Those coming to the book only as American Idol fans might be disappointed by the relatively small amount of space devoted to the show. Besides, it’s clear Tyler’s decision to join Idol is best understood in the context of his long-running feud with Aerosmith: He’s a guy cheating on his girlfriend with her enemy, the perky, popular cheerleader.

Does the Noise in My Head Bother You? is much like Tyler himself. What on the surface seems cliched, almost a parody of a rock memoir, manages somehow to rise above that and be a fun ride. And pulling off that trick, ladies and gentlemen, is what separates a Rock Star from a merely ordinary pop star.

Release date Tuesday, May 3 (Ecco Books/HarperCollins, \$27.99, 608 pages)

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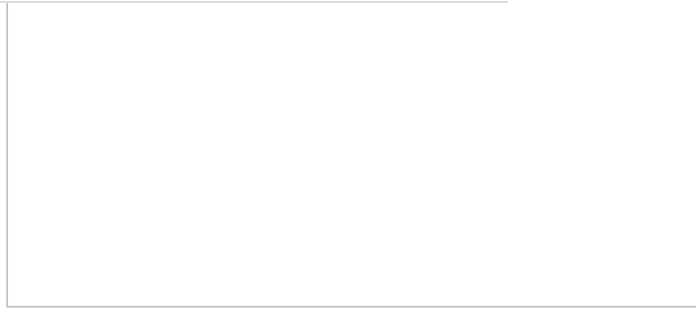
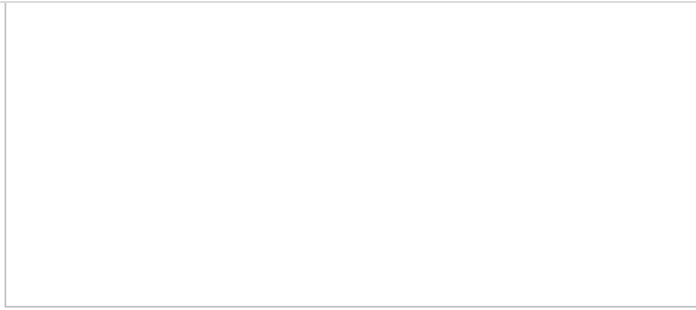
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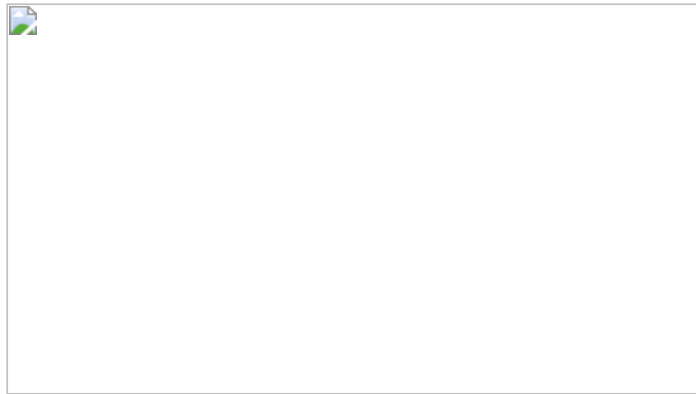
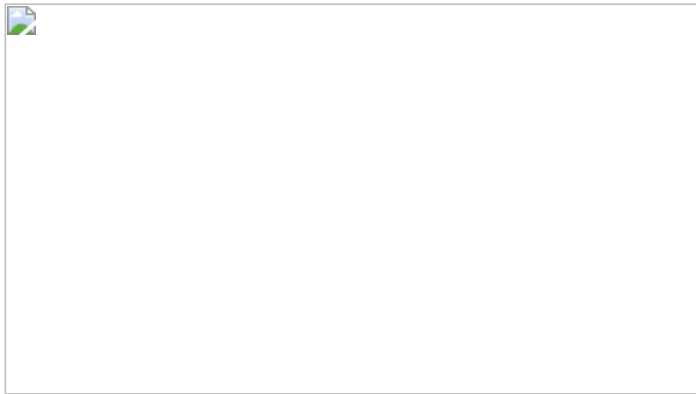


TODD HAIMES

Todd Haimes, Artistic Director and CEO of Roundabout Theatre Company, Dies at 66

SOUTH KOREA

Moonbin, Member of K-pop Band Astro, Dies at 25

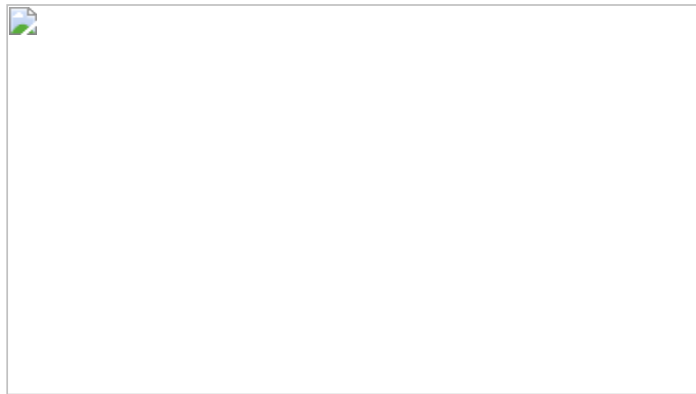
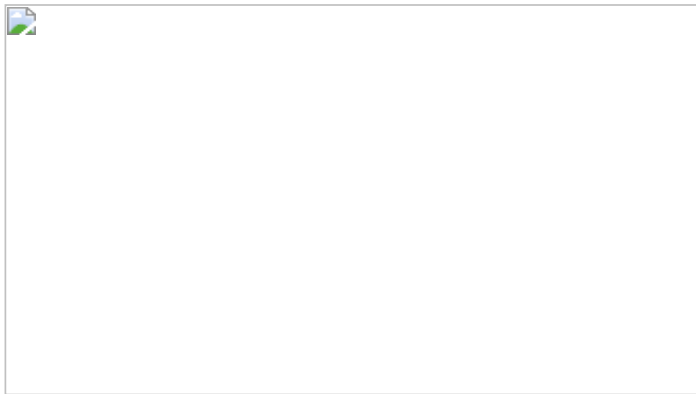


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Foo Fighters Set Release Date for First Album Since Taylor Hawkins' Death



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OUR SITES

EXHIBIT 14

MUSIC

Top 10 Revelations in Steven Tyler's Memoir, *Does the Noise in My Head Bother You?*

BY MARC SPITZ

MAY 9, 2011



photo via PatrickMcMullan.com.*Anyone who watched *American Idol* this year knows that Aerosmith front man/national treasure Steven Tyler has a way with words, but the verdict was out

***P** whether he could sustain his linguistic, shall we say, flash over the course of a book without driving his readers to throw the volume across the room in frustration like it was *Ulysses*. It turns out, with a little help from veteran music writer David Dalton, Tyler can. His memoir reveals much about the poet who penned American classics such as “The buzz that you be getting from the crack don’t last / I’d rather be O.D.in’ on the crack o’ your ass.” Here are the top 10 most terrific revelations that Tyler shares with us, his loyal readers. **1. He was raised by wild animals.** Tyler reveals that as an infant, a “fox came by and grabbed [him] by the scruff of [his] diaper and dragged [him] into the woods.” He maintains that he can return to his magical and mossy kingdom “anytime [he] want[s] because he know[s] the secret of the children of the woods.”

Bonus Fact: Like Marlon Brando before him, the young Tyler owned a pet raccoon. (Brando’s was named Russell. Tyler’s was called Bandit.) “If you take them in they adopt your personality. At 16 I was full of piss and vinegar which is not what you want a wild animal to be.”

2. He (might have) snorted acid.

In the late summer of ’69, Tyler and half a million other hippies were up at Woodstock, putting things into their wet, muddy bodies. “I was tripping my brains out,” he recalls. “And we wouldn’t just do one tab. I’d already snorted another. *Can you snort acid?*”

3. He practiced Sex Magick.

If early Aerosmith songs like “Mama Kin” make you all tingly (as they should), it may be thanks to the Great Beast himself, **Mr. Aleister Crowley**. “I’ve practiced Crowley Magick so I know it works,” Tyler writes of channeling the power of the mutual orgasm to achieve wider goals. “I’m not saying that every girl I slept with came at the same time or that I asked her to pray for the same thing I was praying for; namely that Aerosmith would become the greatest American band.”

4. He smelled like a flower in the 70s.

But didn’t everyone in the 70s? “I lived in black orchid oil. That intoxicating aroma. It’s now illegal to make it because of how many orchids they have to smush.”

5. He nailed those high notes in “Dream On” . . .

. . . in 1972 while sequestered in a Boston airport-hotel room playing Yma Sumac records over and over again. “I loved Yma Sumac, the Inca princess with the five octave voice. I would sing along

with□. that eardrum piercing banshee shriek.”

6. He scored coke with John Belushi.

But didn't everyone in the 70s? “We were so obsessed with copping that night, when the cab driver asked Belushi ‘Where ya heading?’, he answered simply ‘Cocaine!’”

7. He earned the nickname “Spider” because . . .

“. . . I would crawl on the floor looking for a piece of freebase that I thought I dropped but probably already smoked.”

8. He's taken eight trips to the 'hab.

Starting at the Good Samaritan Hospital in 1983 to the Betty Ford Center last year. “I don't remember the exactamongo times,” he writes, but during the last stay, he encounters the Kings of Leon's dad, who introduces himself as “the Kings of Leon's dad.”

Bonus Fact 2: That last trip came a few years after a relapse in which he found himself at Fenway Park in the spring of 2007, singing the National Anthem (flawlessly) while so high “the words [melted] like candle wax against the blue sky.”

9. He (might have) invented the BlackBerry.

“The two guys who created BlackBerry came up with the idea while smoking pot and listening to ‘Sweet Emotion.’”

10. He was referred to the *American Idol* judging table via text by an outgoing Kara DioGuardi.

“Apparently she didn't want to continue doing it. Like a dummy I went, ‘Does it still have high ratings?’”

Does the Noise in My Head Bother You?: A Rock 'n' Roll Memoir is published this month by Ecco.

Marc Spitz

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These Are The Richest American Idol Winners Of All Time, Ranked In Order

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ItsTheVibe



EXHIBIT 15

The New York Times Best Sellers - May 22, 2011

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Combined Print & E-Book Fiction

NEW THIS WEEK
1 DEAD RECKONING

by Charlaine Harris

The telepathic waitress Sookie Stackhouse seeks the culprit in a firebombing.

NEW THIS WEEK
2 10TH ANNIVERSARY

by James Patterson and Maxine Paetro

Detective Lindsay Boxer and the Women's Murder Club race to find a missing baby.

15 WEEKS ON THE LIST
3 WATER FOR ELEPHANTS

by Sara Gruen

After his parents are killed in a car accident, a young veterinary student — and an elephant — save a Depression-era circus.

4 WEEKS ON THE LIST
4 SOMETHING BORROWED

by Emily Giffin

A maid of honor to her charmed friend, Rachel White has always played by the rules. But that changes on her 30th birthday.

12 WEEKS ON THE LIST
5 THE HELP

by Kathryn Stockett

A young white woman and two black maids in 1960s Mississippi.

Combined Print & E-Book Nonfiction

15 WEEKS ON THE LIST
1 HEAVEN IS FOR REAL

by Todd Burpo with Lynn Vincent

A father recounts his 3-year-old son's encounter with Jesus and the angels during an appendectomy.

5 WEEKS ON THE LIST
2 BOSSYPANTS

by Tina Fey

A memoir from the former Saturday Night Live star and creator of "30 Rock."

NEW THIS WEEK
3 DOES THE NOISE IN MY HEAD BOTHER YOU?

by Steven Tyler with David Dalton

The singer and showman recounts the meteoric rise, fall and rise of Aerosmith over the last three decades.

2 WEEKS ON THE LIST
4 STORIES I ONLY TELL MY FRIENDS

by Rob Lowe

The actor charts his professional path, from teen idol to "The West Wing."

NEW THIS WEEK
5 FROM THIS MOMENT ON

by Shania Twain

The country singer and songwriter writes of her hardscrabble origins and her rise to fame.

Hardcover Fiction

- NEW THIS WEEK

1 DEAD RECKONING
by Charlaine Harris
The telepathic waitress Sookie Stackhouse seeks the culprit in a firebombing.

- NEW THIS WEEK

2 10TH ANNIVERSARY
by James Patterson and Maxine Paetro
Detective Lindsay Boxer and the Women's Murder Club race to find a missing baby.

- 3 WEEKS ON THE LIST

3 THE SIXTH MAN
by David Baldacci
The lawyer for an alleged serial killer is murdered, and two former Secret Service agents are on the case.

- NEW THIS WEEK

4 SIXKILL
by Robert B. Parker
In the final Spenser novel, a woman dies in an actor's hotel room.

- 6 WEEKS ON THE LIST

5 THE LAND OF PAINTED CAVES
by Jean M. Auel
The latest volume in a series that began with "The Clan of the Cave Bear," set during the ice age.

Hardcover Nonfiction

- 5 WEEKS ON THE LIST

1 BOSSYPANTS
by Tina Fey
A memoir from the creator of "30 Rock."

- NEW THIS WEEK

2 DOES THE NOISE IN MY HEAD BOTHER YOU?
by Steven Tyler with David Dalton
The singer and showman recounts the meteoric rise, fall and rise of Aerosmith over the last three decades.

- 2 WEEKS ON THE LIST

3 STORIES I ONLY TELL MY FRIENDS
by Rob Lowe
The actor charts his professional path, from teen idol to "The West Wing."

- NEW THIS WEEK

4 IF YOU ASK ME
by Betty White
The seven-time Emmy winner reflects on her seven-decade career in Hollywood.

- 4 WEEKS ON THE LIST

5 SHE WALKS IN BEAUTY
selected and introduced by Caroline Kennedy
Poems that inspired the former first daughter.

Paperback Trade Fiction

1 119 WEEKS ON THE LIST

1 WATER FOR ELEPHANTS

by Sara Gruen

After his parents die in a car accident, a young veterinary student — and an elephant — save a Depression-era circus.

2 5 WEEKS ON THE LIST

2 THE HELP

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Three women — a white socialite and two black maids — work on a tell-all book about black domestic servants in 1960s Mississippi.

3 7 WEEKS ON THE LIST

3 A VISIT FROM THE GOON SQUAD

by Jennifer Egan

Time is the relentless “goon squad” in this rock ‘n’ roll novel, which explores the tattered lives of a cynical record producer and the people who intersect his world.

4 5 WEEKS ON THE LIST

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A maid of honor to her charmed friend, Rachel White has always played by the rules. But that changes on her 30th birthday.

5 67 WEEKS ON THE LIST

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Twin brothers, conjoined and then separated, grow up amid the political turmoil of Ethiopia.

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1 2 WEEKS ON THE LIST

1 WORTH DYING FOR

by Lee Child

In the corn country of Nebraska, Jack Reacher can't let go of a decades-old case of a missing child.

2 4 WEEKS ON THE LIST

2 THE SEARCH

by Nora Roberts

Fiona Bristow, a canine search-and-rescue trainer, has found peace after losing her fiancé to a serial killer. But her life is shaken by a new man and a copycat murderer.

3 10 WEEKS ON THE LIST

3 WATER FOR ELEPHANTS

by Sara Gruen

After his parents die in a car accident, a young veterinary student — and an elephant — save a Depression-era circus.

4 7 WEEKS ON THE LIST

4 A GAME OF THRONES

by George R.R. Martin

In the frozen wastes to the north of Winterfell, sinister and supernatural forces are mustering; Book 1 of "A Song of Ice and Fire."

5 2 WEEKS ON THE LIST

5 STORM PREY

by John Sandford

Lucas Davenport's wife is a witness to a botched robbery and murder in the 20th novel in the “Prey” series.

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- 1 25 WEEKS ON THE LIST
HEAVEN IS FOR REAL
 by Todd Burpo with Lynn Vincent
 A boy's encounter with Jesus and the angels.

- 2 9 WEEKS ON THE LIST
THE IMMORTAL LIFE OF HENRIETTA LACKS
 by Rebecca Skloot
 The story of a woman whose cancer cells were extensively cultured without her permission in 1951.

- 3 61 WEEKS ON THE LIST
LONE SURVIVOR
 by Marcus Luttrell with Patrick Robinson
 The harrowing story of a Navy Seals operation.

- 4 6 WEEKS ON THE LIST
BORN TO RUN
 by Christopher McDougall
 Secrets of distance running from a Mexican Indian tribe.

- 5 NEW THIS WEEK
LIFE
 by Keith Richards with James Fox
 The Rolling Stones guitarist's revealing autobiography.

E-Book Fiction

- 1 NEW THIS WEEK
DEAD RECKONING
 by Charlaine Harris
 The telepathic waitress Sookie Stackhouse seeks the culprit in a firebombing.

- 2 NEW THIS WEEK
10TH ANNIVERSARY
 by James Patterson and Maxine Paetro
 Detective Lindsay Boxer and the Women's Murder Club race to find a missing baby.

- 3 15 WEEKS ON THE LIST
WATER FOR ELEPHANTS
 by Sara Gruen
 After his parents are killed in a car accident, a young veterinary student — and an elephant — save a Depression-era circus.

- 4 4 WEEKS ON THE LIST
SOMETHING BORROWED
 by Emily Giffin
 A maid of honor to her charmed friend, Rachel White has always played the game by the rules. But that changes on her 30th birthday.

- 5 NEW THIS WEEK
NO TIME LEFT
 by David Baldacci
 When an expert assassin takes a mysterious job, he has no idea that it will force him to delve deeply into his own past.

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1 5 WEEKS ON THE LIST

BOSSYPANTS

by Tina Fey

A memoir from the former Saturday Night Live star and creator of "30 Rock."

2 15 WEEKS ON THE LIST

HEAVEN IS FOR REAL

by Todd Burpo with Lynn Vincent

A father recounts his 3-year-old son's encounter with Jesus and the angels during an emergency appendectomy.

3 NEW THIS WEEK

DOES THE NOISE IN MY HEAD BOTHER YOU?

by Steven Tyler with David Dalton

The singer and showman recounts the meteoric rise, fall and rise of Aerosmith over the last three decades.

4 2 WEEKS ON THE LIST

STORIES I ONLY TELL MY FRIENDS

by Rob Lowe

The actor charts his professional path, from teen idol to "The West Wing."

5 15 WEEKS ON THE LIST

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by Mike Moreno

Four cycles to help you burn fat every day.

3 2 WEEKS ON THE LIST

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Feeling better as you age by addressing exercise, diet, sleep and skin care.

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by Guy Fieri

Stories and recipes showing how the Food Network star got where he is today.

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An Internet entrepreneur's strategies for earning money online.

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10 WEEKS ON THE LIST

1 THE HAPPINESS PROJECT

by Gretchen Rubin

In a hunt for happiness, the author consulted science, ancient wisdom and pop culture.

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THE FIVE LOVE LANGUAGES

by Gary Chapman

How to communicate love in a way a spouse will understand.

3 510 WEEKS ON THE LIST
WHAT TO EXPECT WHEN YOU'RE EXPECTING

by Heidi Murkoff and Sharon Mazel

Advice for parents-to-be.

4 29 WEEKS ON THE LIST
CRAZY LOVE

by Francis Chan with Danae Yankoski

A pastor on breaking free from the religious status quo.

5 NEW THIS WEEK
THE BOOK OF AWESOME

by Neil Pasricha

Reminders about the little things that make us smile every day.

BEST SELLERS METHODOLOGY

A version of this list appears in the May 22, 2011 issue of The New York Times Book Review. Rankings on weekly lists reflect sales for the week ending May 7, 2011. Lists are published early online.

[More about our methodology](#)

EXHIBIT 16

REBEL HEART



An American
Rock 'n' Roll Journey

BEBE BUELL
with **VICTOR BOCKRIS**

ISBN 0-312-26694-4

\$24.95

\$36.95 Can.

"Bebe Buell is the Eagle Woman of Rock 'n' Roll, a muse/goddess, and an artist in her own right. *Rebel Heart*, written with the indispensable cultural chronicler Victor Bockris, is her true story, told with a passionate intelligence that will make you reconsider what you think you know about the music scene. Fasten your seatbelts, *Rebel Heart* is a wild ride."—Stephen Davis, author of *Hammer of the Gods*

"Bebe's pure joy was infectious to everyone around her."

—Cameron Crowe

"Buell has a carbonated sense of humor."

—*Kirkus Reviews*

WARM, WISE, OUTRAGEOUSLY funny—and simply outrageous—*Rebel Heart* is Bebe Buell's no-holds-barred account of her life at the center of the rock scene in the '70s and '80s, when rock stars *were* royalty.

A wild child model before the type ran rampant, Buell worked with the best of them, met everyone from Warhol to Dali, and captivated a generation of rock's greatest talents. She became involved in relationships with many of them—from wunderkind Todd Rundgren to Aerosmith's Steven Tyler (father of her daughter Liv), from Mick Jagger to wordsmith Elvis Costello. Not to mention the fun she had with everyone from Rod Stewart to Ron Wood, Jimmy Page to Jack Nicholson.

In *Rebel Heart*, Bebe drops readers back into the heyday of the scene and

(continued on back flap)

(continued from front flap)

reveals the true details of a vanished world that continues to fascinate today. Her spirit informed some of the greatest songs of her time, and the life she lived was, above all, fun.

Illustrated throughout with over a hundred photographs—many of them rare snaps from Bebe's personal collection—*Rebel Heart* will deepen even the most ardent fan's understanding of rock 'n' roll.



MICK ROCK

BEBE BUELL performs with her band across the country. She lives in New York City and in Maine. This is her first book.

VICTOR BOCKRIS is the author of *Uptight: The Story of the Velvet Underground* and *What's Welsh for Zen: The Autobiography of John Cale*. He lives in New York City.

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Styling by STELLA ZOTIS

Back jacket photograph by LYNN GOLDSMITH

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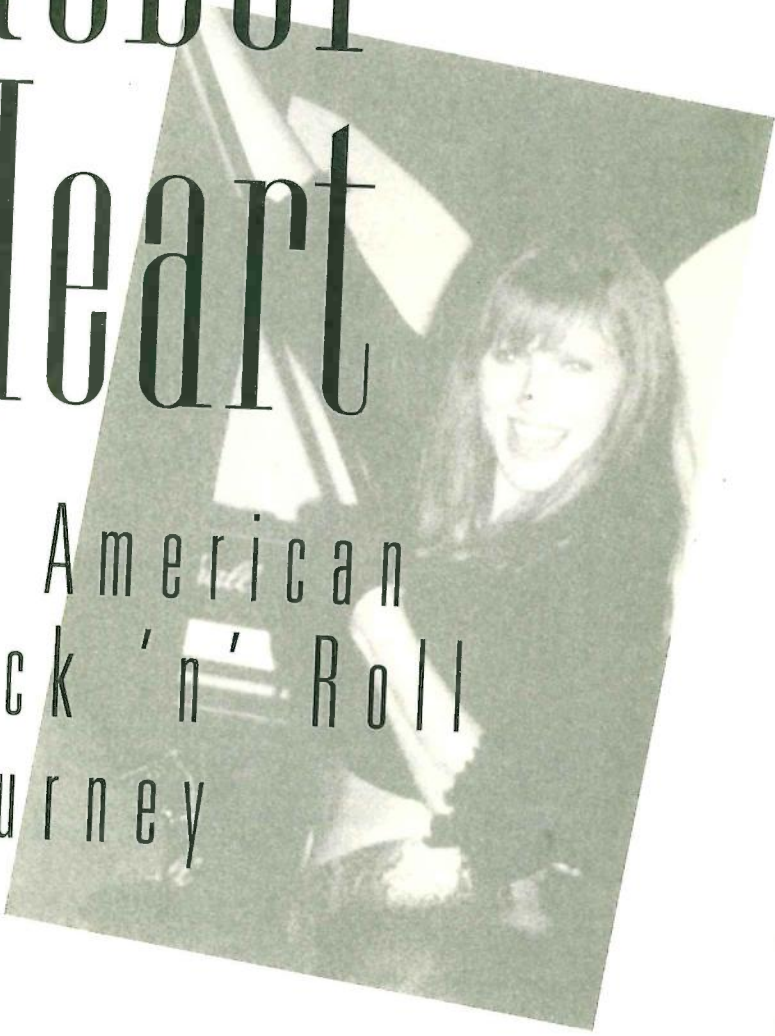
BEBE BUELL



WITH VICTOR BOCKRIS

Rebel Heart

An American
Rock 'n' Roll
Journey



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ISBN 0-312-26694-4

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over, making me feel insecure and alienated, as if Todd and I were on our last legs. I felt vulnerable—and ripe for reprisal.

Mick was on Todd's case from the moment we arrived. He started playing his favorite game, teasing Todd by saying, "You better hold on to your girlfriend, Todd! I'm a bigger star than you are! I'm going to nab her." When Todd was performing, Mick would keep it up. He was shouting out, "Oh, Todd, what a cute ass you have!" Todd got frustrated and angry. I became so flustered, I lost my backstage pass, but Paul and Linda McCartney took me past the guards and into the backstage area, where I could watch the Stones.

Linda and I had met a couple of times socially—at the club of the moment, in New York or London. I always loved that woman. She was so fantastic, a divine, sweet, fabulous woman. I met Paul for the first time at Knebworth. Linda introduced me to him before the show started. Paul was awfully nice. In fact, everybody was. Linda made everyone she came in contact with feel important; there was just something special about her energy. She never acted jealous or threatened, and she was supportive. When you looked at Paul and Linda, you could see they were a couple, and you couldn't imagine one without the other. Jack Nicholson was also at Knebworth. I wanted to get to know him, but everybody, from Mick to Todd, kept me away from him. In the middle of an instrumental break in the Stones concert, Mick danced over to the side of the stage, winked at me, and pinned his pass on my blouse. Can you imagine him thinking about me in the middle of entertaining 200,000 people? He was so adorable.

Immediately after Todd and I got back from Knebworth, I flew out to L.A. with Liz and Rick Derringer for a CBS Records convention. Rick was with Columbia, and so was Aerosmith, and Rick opened for them at the convention. Rick was a member of the Edgar Winter group and a solo star ("Rock 'n' Roll Hootchie Koo"). Aerosmith had just had a big hit with "Dream On." After the show, Liz introduced me to Aerosmith's lead singer, Steven Tyler, also known as "the poor man's Mick Jagger," because of a remarkable resemblance in their lips. Liz had gone to high school with Steven. I wound up sitting with him and his then girlfriend, the extraordinarily gorgeous fifteen-year-old Julia Holcolm. Sitting next to him, I felt like lightning had struck. I had first met Steven at an outdoor

concert in Boston three years earlier. Aerosmith had been considering Todd as producer for their next album. It was raining and muddy in Boston, and I wasn't dressed for inclement weather. Young girls often tend not to wear enough clothes. Todd screamed at me, calling me prissy because I didn't want to walk across a plank above a muddy ditch backstage. I wanted to stay behind, but Todd kept beckoning me across. Steven observed this tense exchange and impulsively leapt into the breach. Strutting over like Zorro, he deftly lifted me up and carried me across the plank. Todd had been pissed that my prissy fit commanded such attention.

Now, we were schmoozing our way through various parties at the lavish CBS convention. Aerosmith was huge: Their current album, *Rocks*, was their biggest hit yet. Both Steven and I felt an undeniable spark, an animal magnetism from the get-go, even though—or perhaps because—Steven knew I was with Todd. Julia was hanging on Steven's arm, and I was mostly hanging with Liz and Rick Derringer. They were like my rock and roll Cleaver parents, and they took care of me when Todd wasn't around. With Rick's success producing and playing with Johnny and Edgar Winter, they had tons of money. Liz was my best friend, and she spoiled me rotten. Julia was stunning, but she had recently had a devastating lost pregnancy and she and Steven were going through a very rough spell. For once, I was the older woman, even though I'd just turned twenty-three. Steven did note that he and I were the only ones wearing leopard skin that night.

Back in New York, Steven started phoning me at 4:00 A.M. At first, he was playful and flirtatious, but always totally wired. He'd taunt me with comments like "Are you still with that asshole?" My connection to Todd had always been karmic, spiritual, almost incestuous. He was the overbearing father and I was the rebellious daughter. With Steven, the connection was more primal. Todd had his pompous, rigid, extremely opinionated, combative side. I once insulted him by calling him "a closet debate team captain," putting him down by saying, "Go back to high school and get it out of your system!" So when Steven Tyler, that rock and roll knight in shining leopard, roared into my life and swept me off my feet with his grandstanding displays of rock-star chivalry, it was exactly what the doctor had ordered. The timing was perfect.

We fell madly in love. When we woke up the next morning, we knew it. He asked me to go with him to Sunapee, New Hampshire.

In the fall of 1976, Steven Tyler was riding high on the crest of Aerosmith's first wave of success. There were several things about him that I found extremely attractive. He was beautiful, he had a lot of style—both in the way he dressed and the way he courted me—and he was full of fun. He had the kind of innocent joy about life that successful people possess. And he was very rich. All these things made being with him constantly exciting. For example, when he said he wanted to fly up to his estate in New Hampshire, I didn't realize he meant in his own plane. Mick had flown me to Montauk on a chartered plane, but Steven was the first man who flew me off my feet.

Flying in his little four-seater private plane was the scariest ride of my life. The pilot, the great R&B singer and songwriter Bobby Womack, Steven, and I were on board. Tell me how we got there! They were all doing blow, including the pilot. He was a pilot/au pair/houseboy, whatever. Totally had his shit together. I don't know how he did it, but he did. Trust me, you do not want to fly in a small plane with Steven Tyler. The plane was being kept high by more than its wings. Being confined in a tiny area with a person who had the energy of fifty wild ponies was terrifying.

"I wanna sit in the back! No, I wanna sit in the front now!"

He just couldn't sit still.

The next four days consisted of Steven driving me around in his Porsche, in between doing mountains of cocaine. When we made love, I felt that we connected on some level that was above anything I had experienced. But after a day or two, I saw dark terrain ahead. He was doing lots of drugs with musician buddies. At one point, I put my foot down.

"Could we just not do blow for once and go look at antiques and get a nice dinner out somewhere?" He gritted his teeth and gave me a mocking glare. "We're in the country," I went on. "There are beautiful restaurants, flea markets, antique dealers, fabrics, wallpaper, and carpets to look at and pick out, shops to visit."

I not only couldn't deal with hard drugs; I couldn't even face taking the pill. It made me puffy and, as a model, puffy was the last thing I needed. Of course, we were risking the ultimate Puff by not taking birth control. Sure, I had a diaphragm, but who had time to

fuss with that? I was surprised that Steven finally made an effort to clean up his act for the remainder of the week. We were in love and we were going to be together. I intended to leave Todd, and Steven said he had left Julia, that it was over. We made love all the time. Our mornings began with Steven being romantic, tender, and very generous about my sexual needs, without expecting me to return the favor. I'd never known a man as enamored of pussy as Steven was. Our lovemaking felt powerful, purposeful, somehow meant to be. He was robust, funny, and sexy. We had lots of passionate, intimate times together in bed. I had a mystical hunch we had been brought together by some higher power—and that there would be a glorious outcome to this mating ritual. The idea of being apart suddenly seemed unimaginable.

When Steven asked me to accompany him on Aerosmith's six-week European tour in the fall, I said yes. It was much more than just wanting to hang out with him; something inside told me we had already conceived a child.

We flew to Boston and then went to Steven's carriage house in Brookline. He assured me Julia had already packed and was now headed back to her parents' home in the Pacific Northwest. I was looking forward to a night of togetherness, but I was greeted by far more togetherness than I'd bargained for. Julia was still there, holed up with a girlfriend, and in terrible shape. She was sobbing, stoned, disoriented, and hysterical over leaving Steven. As awkward as the situation was, I was neither angry nor offended. Instead, my heart broke for this young girl. She was crushed. I'd been there, done that, and knew what she was feeling.

I asked Steven to leave us alone so we could talk. Maybe it was my maternal hormones beginning to kick in, but I found myself adoring and protecting Julia. I held her in my arms for twenty minutes, comforting her as she sobbed. This was hardly the smooth mutual parting of the ways he had described, saying she was too young and needed to go out and get a life. He was playing a little too fast and loose with the two of us, having figured out that the truth would have caused me to back off. Even a year after the lost pregnancy, Julia was deeply saddened and shaken. She seemed lost. But there we were. Julia took the bedroom; Steven and I took the huge living room sectional.

I kept a diary of our time together that fall of 1976. A few entries from the beginning of the diary reveal my state of mind:

SATURDAY, OCTOBER 2: *Steven's house is going to be gorgeous when he gets it together. I still love Todd, but I know he's not right for me. Steven's perfect for me, and I am so in love and my stomach hasn't stopped butterflying since we've been together. The only obstacles in our way are: Julia on his end, and Todd on my end. I've finally fallen in love with Steven, OH MY GOD! Not since Jimmy Page have I felt this way for anyone besides Todd.*

It's going to be hard for us both, harder for me because Julia is in Portland with her parents. He's already laid the law down to her about me, but I haven't said a word to Todd. I spoke to him on the phone tonight. I tried so hard to be the best for Todd, but it just isn't my dream of a relationship. Steven gives me the affection and attention that Todd doesn't know how to give. Help me, God! I am going through this very important change. I'm hopelessly in love with Steven. I know this is my mate. Thank you, God! We made beautiful love this afternoon when we woke up.

MONDAY, OCTOBER 4: *Steven broke up with Julia tonight while I'm on the plane going back to New York. Leaving Steven was horrible, but it was my own choice. Julia is in Boston as of this morning. I must get back and talk to Todd about all of this. He must know, because this isn't just an affair; this is real. I've got to get to Europe. I must be with Steven for the tour. And I'm going to do all I can to pull it off. I know this is the man I am going to marry.*

When I got home, I had just enough time to grab my passport, pack some things at Horatio Street—and unload the news on Todd, who was up in Woodstock. When Susan, who happened to be visiting, picked up the phone, that sealed the deal. I asked for Todd. "I'm going to London for a while to model," I announced. Todd deserved at best a half truth, and I threw him one. The sound of Susan's voice seriously diminished whatever guilt I might otherwise have felt.

TUESDAY, OCTOBER 5: *Back to New Hampshire to be with Steven. When we got back to the house, we talked about me going to Europe.*

WEDNESDAY, OCTOBER 6: *I think I'm going to London with Steven and I'll work while he works. Things are getting so bent out of shape. I don't want Steven's and my love to be killed by all this ugliness and bitter feelings.*

THURSDAY, OCTOBER 7: *Steven and I made love twice tonight, and it was perfect. I couldn't help reflecting how fast going from the photographer Clive Arrowsmith to live Aerosmith was changing my life. I told Todd I was going to Europe with Steven, but I had decided that I was going to go as far as London and model while he did all the rest of the tour.*

SATURDAY, OCTOBER 9: *Jeff Beck at the Academy of Music. Dinner with Steven at an Italian restaurant. Confrontation with Julia. Shit hits the fan. Leave for Europe with Steven.*

MONDAY, OCTOBER 11: *In London. We slept until around 6:00 P.M. and then went down to the hotel to rehearsal. Then we went to the Speakeasy at four in the morning. When we got back to the hotel, we made love three times, all but once in the afternoon, when we woke up.*

THURSDAY, OCTOBER 14: *Steven played Scotland. TODD CALLED. UH-OH!! Sixteen days pregnant? Because I'm already feeling weird. Told him about pregnancy. Weird conversation, called again, and we had a beautiful talk. All is well. Todd truly loves me.*

FRIDAY, OCTOBER 15: *Steven is acting very weird. I miss Todd! Ha ha ha. MY PERIOD BETTER START! We went shopping at Harrods.*

SATURDAY, OCTOBER 16: *Drove to Birmingham with Steven for the gig, talked about my being pregnant and he said he wanted the baby.*

SUNDAY, OCTOBER 17: *Hammersmith Odeon. Great show. Party afterward with lots of noisy people and photographers, but so fun. Queen was there. Bob Gruen got lots of pictures. As for New York—spoke to Todd. Not so good.*

eighteen with my first band." So then we got into a big fight about the lineage of Woody's Truck Stop, Nazzy, and all that Philadelphia rock history and Todd's Upper Darby roots.

Todd really seemed to enjoy showing me off when I was pregnant. When I was almost eight months along and big, in May 1977, he took me to L.A. for Utopia's tour out west. I got to show off my glorious belly and cleavage in a sexy Oscar de la Renta number at a record-industry bash for Todd at Carlos and Charlie's on the Strip. Tom Petty was introduced to me, and he said, "Bebe, you look radiant." Pregnancy clearly agreed with me. But as the weeks ground on, it became increasingly apparent that Todd and I were just another couple of beautiful people going through the motions. And Steven wasn't going down without a fight. He still knew how to push my buttons.

When I returned to Horatio Street from L.A., Todd was still on the road. Steven came by and I made a fire, which he found amusing, since it was the end of May. Steven rubbed my tummy and talked sweetly as we sat by the fireplace. After a melancholy attempt to get back with Julia, he explained, he had had a couple of new girlfriends, but he still missed me. He claimed to be clean of drugs, although it was obvious to me that he had gotten coked up in preparation for his visit. Suddenly, Steven fell to his knees, burst into tears, and begged me to take him back! When I said a condition of my coming back was that he had to give up drugs, he flatly refused! I was so pissed, I lashed out. "It's not your baby anyway," I screamed. "I got the dates all mixed up when I figured out the timing! I've been pregnant longer than I thought." Steven was so high, so angry, and so upset, it was impossible to tell how much he grasped. But a look of pure madness flashed in his eyes. Then he went into an Elvis Presley routine, heavy with cornpone concern: "Is he treating you well? Are you making love with each other?"

"Well, we're not making love, because he's never here."

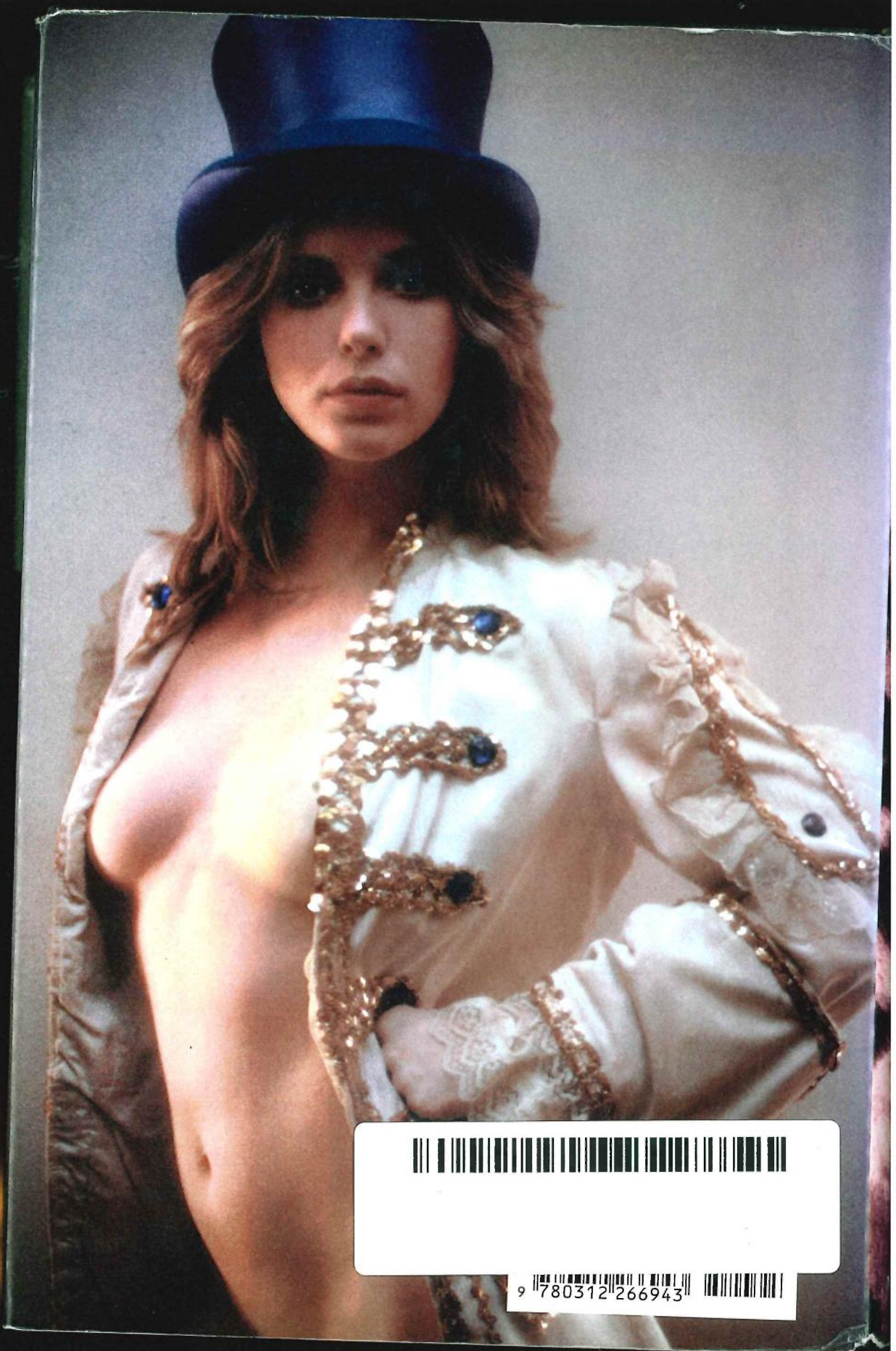
"Well, Beeber, you can't go through a whole pregnancy and not make love." Suddenly, we were in each other's arms. In the light of the fire, it was one of the most deeply intimate moments I've ever shared with a man. Steven made it through to 5:00 A.M., but then he split to reup his stash.

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EXHIBIT 17

About

LifeSiteNews.com is a non-profit Internet news service dedicated to issues of life, family, and many related issues. It was launched in September 1997 to especially provide an alternative to the mainstream news that was either ignoring or providing highly slanted reporting on these issues and on the activities and statements of pro-life, pro-family organizations in the world.

LifeSiteNews Daily News reports and information pages are used by numerous organizations and publications, educators, professionals and political, religious and life and family organization leaders and grassroots people across North America and internationally.

LifeSiteNews.com Daily News reports are widely circulated reports on important developments in the United States, Canada and around the world. Their purpose is to provide balance and more accurate coverage on the issues we focus on than is usually given by other media. LifeSite news reports are available by free daily email subscription and on LifeSiteNews.com.

LifeSiteNews Principles

1. Accuracy in content is given high priority. News and information tips from readers are encouraged and validated. Valid corrections are always welcome. LifeSiteNews journalism is of a professional calibre.
2. LifeSiteNews.com emphasizes the great importance to society of traditional Judeo-Christian moral principles and especially Natural Law but is also respectful of all authentic religions and cultures that esteem life, family and universal norms of morality.
3. LifeSiteNews.com's writers and its founders and founding organization, have come to understand that respect for life and family are endangered by an international conflict. That conflict is between radically opposing views of the worth and dignity of every human life and of natural family life, freedom, faith, and community. It has been driven especially by global de-population secularists attempting to eliminate Christian morality and natural law principles which are seen as the primary obstacles to implementation of their new world order.

4. LifeSiteNews.com understands that abortion, euthanasia, cloning, “LBGTQ,etc,” de-population, alleged man-made “climate change,” world governance, radical environmentalism, and many other related issues, are all interconnected in an international conflict affecting all nations, even at the most local levels. LifeSiteNews attempts to provide its readers with the “big picture” and the most useful and up-to-date information on this conflict.

5. LifeSiteNews.com attempts to dispel confusion and ignorance, enable constructive dialogue and help informed decisions to be made and appropriate actions to be taken for the good of all.

Who Produces LifeSiteNews?

This service was originally started and operated during its first ten years by Campaign Life Coalition (CLC), the Canadian national pro-life organization headquartered in Toronto, Canada. Campaign Life Coalition, founded in 1978, was one of the first pro-life organizations to recognize and emphasize the international dimension of attacks on life and family. Along with a few other groups, it pioneered pro-life lobbying at United Nations conferences. CLC president during those ten years, Jim Hughes, was also vice-president of the International Right to Life Federation.

CLC’s international dimension spurred the development of LifeSiteNews as an international news service. LifeSiteNews.com U.S. (2007) and Canada (2009) became separately incorporated as non-profit organizations. Jim Hughes has been a board member of both branches since the incorporations, with the current president of CLC also becoming a board member on both since he assumed the presidency of CLC.

LifeSiteNews is not involved in direct political action and does not support or oppose political candidates or parties. LifeSiteNews is primarily a news and information service that has in the last several years added extensive, professional quality video programming to its services.

In recent years, because of growing, extensive discrimination against conservatives by online petition and crowdfunding services, LifeSite implemented its own, successful Life Petitions and LifeFunder services.

The 1997 original staff of LifeSiteNews are current co-presidents Steve Jalsevac and John-Henry Westen. LifeSiteNews management and journalists/researchers are located in various cities in the United States, Canada, various European nations, India and Kenya.

Americans have become by far the largest LifeSiteNews readership. Canadians are next, followed by smaller numbers of readers in many other nations.

LifeSiteNews.com networks regularly with leaders and other organizations around the world.

Funding

LifeSiteNews.com depends predominantly on the donations of generous readers to maintain its free service. It also has a limited paid advertising program.

EXHIBIT 18

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News

LifeSiteNews removed from Facebook for violating COVID-19 misinformation policies

The ultraconservative website, which often features faith content, was removed for 'repeatedly violating our COVID-19 policies,' a Facebook spokesperson told RNS.



A Facebook sign in New York City. Photo by Alex Haney/Unsplash/Creative Commons

May 5, 2021

By *Jack Jenkins*

 EN ^





Listen to this article



(RNS) — The ultraconservative website LifeSiteNews has been removed from Facebook, with the tech giant accusing the group of violating policies regarding COVID-19.

LifeSiteNews, an often faith-themed website that Snopes.com [describes](#) as “a known purveyor of misleading information,” announced the Facebook ban on its own website Tuesday (May 4).

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“Facebook has just permanently banned LifeSiteNews’ Facebook page,” the announcement read. “This apparently is not a temporary measure: It is gone for good.”

The announcement quoted LifeSiteNews marketing director Rebekah Roberts, who framed Facebook’s decision as “another case of Big Tech silencing free speech on their platform.”

A Facebook spokesperson confirmed the removal of LifeSiteNews’ page to Religion News Service on Wednesday, saying, “we have removed this page for repeatedly violating our COVID-19 policies.”

According to LifeSiteNews, Facebook told the site’s marketing officials their Facebook page was taken down in accordance with the company’s policy of removing accounts that distribute “vaccine discouraging information on the platform.” It also allegedly accused the site of publishing “false information about COVID-19 that could contribute to physical harm.”

Facebook allegedly cited at least one article from April 9 — titled “COVID vaccines can be deadly for some” — as an example of content that triggered the removal of the page. The article, which remains on LifeSiteNews’ website, appears to be a repost from a blog titled “The Dark Side of Vaccines” and authored by a self-described “health educator and wellness consultant.”

The article is misleading: It cited anecdotal reports of people dying after receiving COVID-19 vaccines, but neither report cited by the author provided evidence to showcase a direct link between the vaccine and the deaths in question — a fact the author did not highlight. In fact, one of the anecdotal reports linked to in the article quoted a doctor declaring they “don’t have any data to suggest the (COVID-19) vaccine has any affect in either direction” regarding a death.

Multiple health agencies across the globe have deemed several COVID-19 vaccines — including the Pfizer-BioNTech vaccine that was the focus of the blog in question — highly effective and safe for use. Of the three approved for use in the United States, only a one-dose vaccine produced by Johnson & Johnson has received additional scrutiny from federal health officials since it was first granted emergency use authorization. Officials paused its use for a short span last month, but opted to reauthorize it alongside a warning about blood clots that had impacted six individuals out of more than 6.8 million people who had received the vaccine.



LifeSiteNews also said it was recently banned from YouTube.

Facebook did not respond to a request to confirm specific details of LifeSiteNews' account of the ban.

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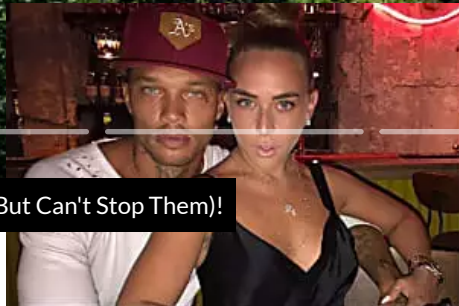
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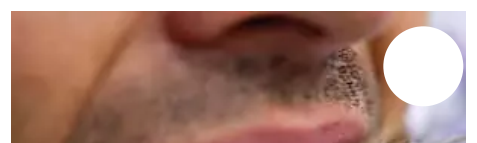
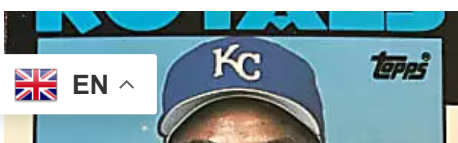
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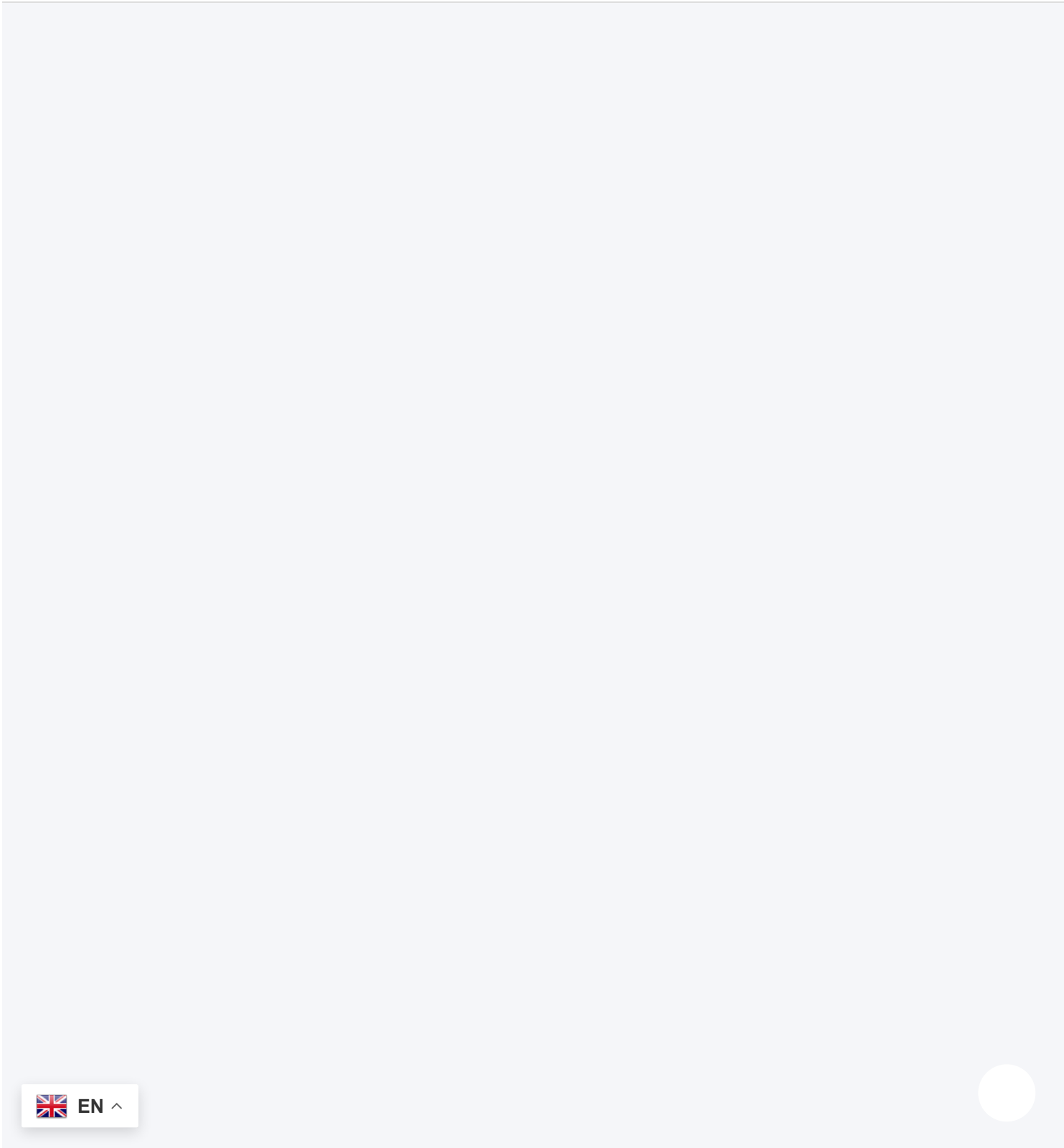


EXHIBIT 19

**Thumb Drive of Video Exhibit Lodged with the Court
(*Julia Holcomb at the 2012 March for Life.mkv*)**

EXHIBIT 20



Julia Holcomb at the 2012 March for Life

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Julia speaks out at the 2012 March for Life in Washington, D.C. about her abortion experience with Steven Tyler, lead vocal of Aerosmith.

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Steven Tyler Interview
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Aerosmith Interview: Steve Tyler & Joe Perry - Music from...

EXHIBIT 21

Thumb Drive of Video Exhibit Lodged with the Court
(Julia Holcomb 2015.mp4)

EXHIBIT 22



Julia Holcomb 2015

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EXHIBIT 23

Thumb Drive of Video Exhibit Lodged with the Court
(Julia Holcomb Fox News Interview.mkv)

EXHIBIT 24

FOX NEWS channel

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Julia Holcomb Fox News Interview

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10,994 views Oct 28, 2020 Tucker Carlson interviewed Pro-Life activist, Julia Holcomb, about her horrific abortion experience with ex-fiancé, Steven Tyler.

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New detail in Dominion's case against Fox News MSNBC 26K views · 11 hours ago New 3:15

Me Gustas Tu Manu Chao 72M views · 7 years ago

EXHIBIT 25

Julia Holcomb

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Speaker Name GO



Julia Holcomb *Former girlfriend of Steven Tyler, lead singer of the rock band Aerosmith and American Idol judge*

BIOGRAPHY SCHEDULE THIS SPEAKER! EVENT REVIEWS

When Julia Holcomb was 16 years old she became the legal ward of Steven Tyler, lead singer of the rock band Aerosmith and American Idol judge. At age 17, when she was over 5 months pregnant with Tyler's first child, she barely survived a fire that burned their apartment. While still in the hospital recovering from smoke inhalation she was coerced into a horrific saline abortion. She is the author of the memoir *The Light of the World - the Steven Tyler and Julia Holcomb Story*, published on LifeSiteNews and credits her faith in Jesus Christ as the life line that helped her rebuild her life after her abortion trauma.

Ambassador Exclusive Speaker

She writes, "I pray that all those who have had abortions or have participated in any way in an abortion procedure may find in my story, not judgment or condemnation, but a renewed hope in God's steadfast love, forgiveness and peace. Marriage and the family are the building blocks of all virtuous societies. I pray that our nation may find it's way back to God's plan

TOPICS:



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Pro-Life

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April Hernandez-Castillo
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Julia Holcomb *Former girlfriend of Steven Tyler, lead singer of the rock band Aerosmith and American Idol judge*

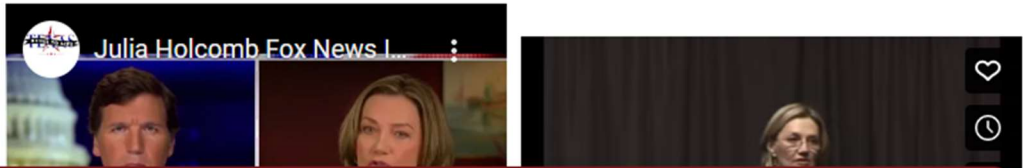
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When Julia Holcomb was 16 years old she became the legal ward of Steven Tyler, lead singer of the rock band Aerosmith and American Idol judge. At age 17, when she was over 5 months pregnant with Tyler's first child, she barely survived a fire that burned their apartment. While still in the hospital recovering from smoke inhalation she was coerced into a horrific saline abortion. She is the author of the memoir *The Light of the World - the Steven Tyler and Julia Holcomb Story*, published on LifeSiteNews and credits her faith in Jesus Christ as the life line that helped her rebuild her life after her abortion trauma.

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Julia is also an accomplished artist, having studied painting at the University of Houston, the Toronto Academy of Realist Art and at Angel Academy in Florence, Italy . She specializes in iconography, portraiture and landscape realism. Today, Julia is happily married to her husband and together they have 7 children.

MEDIA



texas

Julia is happily married to her husband and together they have 7 children.

YOU MAY ALSO LIKE:



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Family, Motivational, Pro-Life

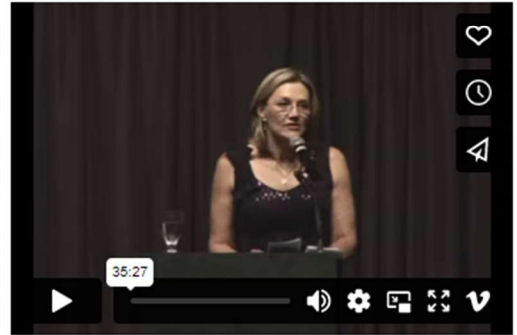


Lauren Roman
Pro-Life, Recovery, Women

MEDIA



Julia Holcomb Fox News Interview: 5.47 min



Julia Holcomb: 35.45 min

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EXHIBIT 26

Activist to teens: Jesus' mercy is available after abortion




[AC arkansas-catholic.org/news/article/7710/Activist-to-teens-Jesus-mercy-is-available-after-abortion](https://arkansas-catholic.org/news/article/7710/Activist-to-teens-Jesus-mercy-is-available-after-abortion)



.....

Youth Advisory Council member Zach Ellis (right), a parishioner at Our Lady of Holy Souls in Little Rock, encourages Psalm Wistrand and Hudson Vacca, members of St. Agnes Church in Mena, to participate in icebreakers to open the Weekend for Life Jan 21, the night before the annual eucharistic procession, Mass and March for Life in Little Rock. (Chris Price photo)

Diocese's Weekend for Life for teenagers returns after two-year hiatus following COVID

Published: February 2, 2023   

By Chris Price

Arkansas Catholic Staff



Chris Price

Julia Holcomb Misley, who as a teenager became pregnant and aborted Aerosmith singer Steven Tyler's child and later converted to Catholicism and became an anti-abortion activist, was the keynote speaker at the diocese's Weekend for Life for teenagers in Little Rock Jan 21.

Sex, drugs and rock and roll are surefire ways to get teenagers' attention, but it's the repercussions of those activities that can have a lifelong impact.

That's what 300 Catholic teenagers and adult chaperones who packed the DoubleTree Hotel in downtown Little Rock learned during the return of Weekend for Life Jan. 21–22.

The overnight "lock-in" event for high school students focuses on right-to-life issues through a teen perspective and includes icebreakers, praise and worship music by Team Jesus, a teen band based at Christ the King Church in Little Rock, keynote speech, prayer, skits and dance.

It was the first time since 2020 that the diocesan Youth Ministry Office was able to host the event after it was canceled because of COVID-19 pandemic precautions the past two years.

“In normal day-to-day life, you don't see a lot of people that are really on fire for their faith, but just being able to come here and see just how many people there are just in your state alone who really love God and love life and just want to show that love, it's really great,” said Zachary Ellis, 16, of Little Rock.

This year's featured speaker was Julia Holcomb Misley, who, in 1973, as a 16-year-old became a girlfriend and eventual ward of Aerosmith singer Steven Tyler, then 25, so that he could take her across state lines when his band was on tour. During their relationship, she became pregnant, but he convinced her to have an abortion.

Once she did, she discovered Tyler was seeing other women and their relationship ended. Soon after, she met and married Bradley Misley, her husband of 40 years. She converted to Catholicism and became a mother of seven and a staunch pro-life activist.

"I hope these teens are encouraged that life is a treasure and a gift that they should protect and guard and that the Church is a wonderful strength and a force for good," the 65-year-old told Arkansas Catholic after her speech. "I also hope that they will never forget that in their weakest moments, when they need mercy the most and they're the most afraid to ask for it, that Jesus is there and he loves them and he forgives them. I want to encourage women and men who have committed serious sins to never fear to approach the sacraments or to return to Christ. He's merciful and loves us."

Gillian Lachowsky, 18, co-chair of the diocese's Youth Advisory Council and member of St. Mary Church in Altus, was inspired by Misley's message.

"It's insane that any of that even happened to her, and the fact that she was able to take all the bad things that have happened and use it for good in this kind of setting is just amazing," she said. "It's awesome what God can do in such a bad situation. It just really helps to have these kinds of events that you can go to and have people praying with you and for you and have speakers that have really experienced issues in that area."

Zachary Ellis, 16, a member of Our Lady of the Holy Souls Church in Little Rock, said he knows people who have gone through the struggles of whether or not to get an abortion. Being at Weekend for Life with like-minded teens is reassuring and comforting, he said.

"Each life is sacred from in the womb to on the deathbed, and I don't think it's right for any of us to take that away," he said. "In normal day-to-day life, you don't see a lot of people that are really on fire for their faith, but just being able to come here and see just how many people there are just in your state alone who really love God and love life and just want to show that love, it's really great."

On Jan. 22 the teens and chaperones attended the Eucharistic Procession and Mass for Life at the Statehouse Convention Center.

Liz Tingquist, director of the diocese's youth and campus ministry offices, said at its peak Weekend for Life attracted 600 teens each year, but that number had slipped to about 400 before the pandemic. Because previous attendees have graduated, encouraging teens and their youth groups to attend was a challenge.

“Now that they have experienced a wonderful Weekend for Life, they will go home and talk about it and more will want to participate in our statewide events in the future,” she said. “Some are already talking about how they just haven't had these experiences and they want to do this again. They're ready to come to the annual Catholic Youth Convention in April.”

*Bishop Taylor wants you to know more about your faith & the Church: Sign up for [**Arkansas Catholic's free digital edition**](#).*

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EXHIBIT 27

BREAKING NEWS!

Star



Down Syndrome Drama

Brangie Nanny Tells All

TRUTH ABOUT THE TWINS



Viv



Knox

Lady Gaga hits ROCK BOTTOM



Drunk and on coke – Gaga passed out in a New York City basement

She's addicted to cocaine, scribbling on walls & e-mailing graphic nude photos



Chelsea & Marc TRIAL SEPARATION After just six months!

Idol Bombshell Steven Tyler's TEEN LOVER!



Misley V. Tyler • 000009



FEBRUARY 14, 2011

Steven Tyler's TEEN LOVER

New *American Idol* judge Steven Tyler's constant flirting with teen contestants is raising eyebrows — but it's nothing compared to one mind-blowing chapter in the rock 'n' roll giant's romantic history!

"Everyone thought they were both nuts when they got together," a friend of the couple tells *Star*. "But it was typical of the rock 'n' roll decadence of the '70s; it couldn't have happened in any other era. Steven was totally in love with Julia. Women threw themselves at him, but he didn't want anyone else!"

AN OPEN BOOK

A magazine interview with Steven at his lakeside New Hampshire retreat in the summer of 1976 mentions Julia, then 18, as his

"gentle lady." But the full, bizarre details of their relationship didn't come to light until the 1997 release of the Aerosmith autobiography *Walk This Way*, in which the band members, their families and friends talked openly about their crazy days of sex and drugs.

"Julia's name was changed to the pseudonym 'Diana Hall' in the book," says the friend — but the truth behind her underage liaison with Steven still formed the most explosive section. "I was so in love with her," he says in the book. "She was mysterious and as sexual as I was.... It was like incredible — and so delicious." Their relationship was also described in a second book, *Rebel Heart*, the 2001 autobiography by Steven's former girlfriend, model/singer **Bebe Buell**. But this time Buell used Julia's real name.

As *Star* has learned, before Steven could carry off his teen queen after that fateful

first meeting, he had to win over Julia's parents — and he took legal steps to insure he and their daughter could be together. "Steven came to an agreement with her folks that they would sign over legal guardianship of their daughter to him," the friend tells *Star*. "There were lawyers involved, and I'm sure some money changed hands. Of course, it seems kind of creepy — but it actually wasn't as immoral as it sounds. When Steven falls in love, he does so completely, with his full heart and soul. And that's how he felt about Julia."

But Steven and Julia's three-year relationship wasn't all wine and roses. Their time together seemed much longer to Steven "because we were getting real high too," he later admitted



SHE WAS 15 WHEN THEY FELL IN LOVE!

Steven and Julia Holcomb in L.A. in 1975. He's described her as having "more legs than a bucket of chicken." *Star's* attempts to contact Julia have been unsuccessful.

WHEN Aerosmith's **Steven Tyler** left the stage after a raucous Seattle concert with his rising rock band in late 1973, he locked eyes with stunning Julia Holcomb, who had been hoping to meet the pouty-lipped frontman. "She was so young, so skinny, really beautiful," Steven recalled years later of his love-at-first-sight experience.

And there was one more thing Steven, then 25, learned about Julia that night: she was just 15!

But that didn't stop the besotted rocker and future *American Idol* judge from immediately laying the groundwork for her to move in with him in Boston. And the shocking story behind their three-year love affair — marked by drug abuse, a miscarriage and an abortion — remained a secret until 24 years after they first met.



Misley v. Tyler - 00010



Steven and Bebe with daughter Liv in 1996.

STEVEN'S EX TELLS STAR: "HE'S AN INSTITUTION!"

Count Steven's former girlfriend, model/singer Bebe Buell — the mother of his daughter, actress Liv Tyler, 33 — among those who think he's revitalized *American Idol*. "He's wonderful on the show, very engaging," Bebe, 57, tells Star. "In my opinion, Steven is an American institution, an enormous musical talent. I admire him. He's forever seeking to better himself, and that takes guts! We made a beautiful daughter together, and for that I am grateful and a friend for life. I consider him family." Bebe's autobiography, *Rebel Heart*, was released in 2001.

“When Steven falls in love, he falls hard!”
— a friend tells Star

in *Walk This Way*. They also had more than their share of tragedy along the way.

NO FAIRY-TALE ENDING

Julia was hospitalized in 1975 with bad burns on her arms after she fell asleep in their Boston apartment with a lit cigarette and set it on fire. She also got pregnant and miscarried that year. Their relationship finally ended in late 1976, after Julia, again pregnant, had an abortion. Steven later revealed that “they convinced us [she] was too young and it would never work out and would ruin our lives.... The real-life guilt was very traumatic for me.... And that was it for me and [Julia] after three years.”

Steven, now 62, went on to marry and divorce twice, father four children and do three stints in rehab to battle addictions to heroin, cocaine and painkillers. He's been dating Erin Brady, 39, since 2006.

“Being in a relationship with a rock superstar is a hard thing,” says his long-time friend. “The woman will almost always finish second to the music. And despite how much Steven genuinely loves his partners, he's no exception.”

— ALEX BURTON ★



Steven and his *Idol* costars, Ryan Seacrest, Jennifer Lopez and Randy Jackson.

EXHIBIT 28

BROOKLINE FIRE DEPARTMENT

CHIEF OFFICERS

REPORT OF FIRE OR OTHER EMERGENCY CALL

DATE 10-23-75

BOX# 361 LOCATION 1736 Beacon Street

STILL# _____ TYPE OF ALARM Box Alarm

ALARM# _____ FIRE# _____ POINT OF ORIGIN 1st floor front

ALARM RECEIVED AT 11:50AM. RECALL 12:49 M. BY: D/c J.J. Duffy

OWNER & ADDRESS: (PROPERTY INVOLVED) 1736 Beacon Street

THE BUILDING WAS 3 STORIES, 3rd CLASS, OCCUPIED BY Tenants

AS A Apartment Building

CAUSE OF FIRE Probable careless smoker - Under investigation

OCCUPANTS 1ST. Julia Halcomb
S. Talleriso 3RD.

Basement
&
First

2ND. Francine Leruis 4TH.

AUTOMOBILE

OPERATOR (NAME & ADDRESS) _____

YEAR & MAKE _____ TYPE. _____ REG. NO. _____

REMARKS: (DESCRIBE IN DETAIL, DEPARTMENT OPERATIONS, LOCATION OF FIRE, PROPERTY DAMAGED AND ANY INJURIES OR LOSS OF LIFE.)

On arrival I found heavy fire coming out three front windows and overlapping to
to second floor. Lad. #1 put ladder to roof and opened up skylights and assisted
occupants from bldg., Lad. #2 at rear of bldg. ventilated rear of bldg. as there
was heavy smoke conditions on all floors. Eng. #7 & #2 ran lines into first
floor front & played on fire. E#1 ran a line to 2nd floor.

Fire was confined to 1st floor front of bldg. with heavy fire damage. Called
fire Prevention. The Edison Co., Gas Co. W. Carroll-Elect. Inspector Podice

CONTINUE ON REVERSE SIDE IF REQUIRED

EXAMINED _____

CHIEF OF DEPARTMENT

DATE

J. J. Duffy
CHIEF OFFICER

Photographer

Edison & Gas Shut off. Pictures taken by Aide & Police

I listed case a probable careless smoker under investigation
& Damage at \$15,000.00 Bldg. & contents.
One female victim found in rear room of 1st floor unconscious from smoke
inhalation. Artificial respiration applied and victim sent to Saint
Elizabeth's Hospital (Julia Holcomb)

EXHIBIT 29

1 Michael Reck, State Bar No. 209895
mreck@andersonadvocates.com
2 **JEFF ANDERSON & ASSOCIATES PA**
12011 San Vicente Boulevard, Suite 700
3 Los Angeles, California 90049
Tel: 310-357-2425
4 Fax: 651-297-6543

5 Attorneys for Plaintiff JULIA MISLEY

6 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
7 **FOR THE COUNTY OF LOS ANGELES – TORRANCE COURTHOUSE**

8 This Matter Relates to:)	Case No.: 22TRCV01604
)	
9 JULIA MISLEY, formerly known as JULIA)	Assigned to Hon. Gary Y. Tanaka, Dept. B
10 HOLCOMB, an individual,)	
)	
11 Plaintiff,)	PLAINTIFF JULIA MISLEY’S
)	RESPONSE TO DEFENDANT STEVEN
12 vs.)	TYLER’S DEMAND FOR
)	PRODUCTION OF DOCUMENTS, SET
13 STEVEN VICTOR TALLARICO A/K/A STEVEN)	ONE
14 TYLER, an individual; and DOES 2 through DOE)	
50, inclusive,)	Action Filed: December 27, 2022
)	Trial Date: None Set
15 Defendant)	

16
17 **PROPOUNDING PARTY:** DEFENDANT STEVEN VICTOR TALLARICO A/K/A TYLER
18 **RESPONDING PARTY:** PLAINTIFF JULIA MISLEY F/K/A JULIA HOLCOMB
19 **SET:** ONE

20
21 Plaintiff Julia Misley (hereinafter, “Plaintiff” or “Responding Party”) hereby
22 responds to Defendant Steven Tyler’s (hereinafter, “Defendant” or “Propounding Party”) Demand
23 for Production of Documents, Set One, as follows:

24 ///

25 **PRELIMINARY STATEMENT AND GENERAL OBJECTIONS**

26 The following RESPONSE TO DEMAND FOR PRODUCTION OF
27 DOCUMENTS are made solely for the purpose of this action. Any document or information
28 supplies in RESPONSE TO DEMAND is subject to all objections as to competence, relevance,

1 materiality, propriety and admissibility, and to any and all other objections on any ground that
2 would require the exclusion of any information or document or thing, or portion thereof, if such
3 document or thing were offered in evidence, all of which objections and grounds are expressly
4 reserved and may be interposed at the time of trial.

5 This preliminary statement is incorporated into each and every one of the following
6 responses to DEMAND FOR PRODUCTION OF DOCUMENTS.

7 **RESPONSES TO DEFENDANT'S DEMAND FOR PRODUCTION**

8 **OF DOCUMENTS, SET ONE**

9 **DEMAND FOR PRODUCTION NO. 1:**

10 All DOCUMENTS that RELATE to COMMUNICATIONS between PLAINTIFF and
11 DEFENDANT.

12 **RESPONSE TO DEMAND FOR PRODUCTION NO.1:**

13 Responding Party objects to this interrogatory as it vague, overly broad, and unduly
14 burdensome as to time and scope and intended to harass and annoy the Responding Party.
15 Responding Party further objects as this interrogatory requires Plaintiff to speculate as to what
16 documents might be responsive. Subject to and notwithstanding the foregoing objections,
17 Responding Party responds as follows: Plaintiff is unable to comply because the requested items
18 no longer exist or are no longer in Plaintiff's possession, custody or control.

19 Discovery is ongoing and Responding Party reserves the right to supplement this
20 response.

21 **DEMAND FOR PRODUCTION NO. 2:**

22 All DOCUMENTS that RELATE to COMMUNICATIONS between PLAINTIFF and
23 any other PERSON in connection with DEFENDANT.

24 **RESPONSE TO DEMAND FOR PRODUCTION NO.2:**

25 Responding Party objects to this interrogatory as it vague, overly broad, and unduly
26 burdensome as to time and scope and intended to harass and annoy the Responding Party.
27 Responding Party further objects as this interrogatory requires Plaintiff to speculate as to what
28 documents might be responsive. Subject to and notwithstanding the foregoing objections,

1 Responding Party responds as follows: Plaintiff is unable to comply because the requested items
2 no longer exist or are no longer in Plaintiff's possession, custody or control.

3 Discovery is ongoing and Responding Party reserves the right to supplement this
4 response.

5 **DEMAND FOR PRODUCTION NO. 3:**

6 All DOCUMENTS that RELATE to YOUR medical prescriptions from January 1, 1973
7 to the present.

8 **RESPONSE TO DEMAND FOR PRODUCTION NO.3:**

9 Responding Party objects to this interrogatory as it vague, overly broad, and unduly
10 burdensome as to time and scope and intended to harass and annoy the Responding Party.
11 Responding Party further objects as this interrogatory seeks information that is in violation of a
12 party's constitutionally protected right to privacy under Article 1, Section 1 of the California
13 Constitution. Subject to and notwithstanding the foregoing objections, Responding Party
14 responds as follows: Plaintiff does not have any such document in their possession, custody or
15 control.

16 Discovery is ongoing and Responding Party reserves the right to supplement this
17 response.

18 **DEMAND FOR PRODUCTION NO. 4:**

19 All DOCUMENTS that RELATE to YOUR medical bills from January 1, 1973 to the
20 present.

21 **RESPONSE TO DEMAND FOR PRODUCTION NO.4:**

22 Responding Party objects to this interrogatory as it vague, overly broad, and unduly
23 burdensome as to time and scope and intended to harass and annoy the Responding Party.
24 Responding Party further objects as this interrogatory seeks information that is in violation of a
25 party's constitutionally protected right to privacy under Article 1, Section 1 of the California
26 Constitution. Subject to and notwithstanding the foregoing objections, Responding Party
27 responds as follows: Plaintiff does not have any such document in their possession, custody or
28 control.

1 Discovery is ongoing and Responding Party reserves the right to supplement this
2 response.

3 **DEMAND FOR PRODUCTION NO. 5:**

4 All DOCUMENTS that RELATE to any injuries YOU suffered from January 1, 1973 to
5 the present.

6 **RESPONSE TO DEMAND FOR PRODUCTION NO.5:**

7 Responding Party objects to this interrogatory as it vague as to the term “injuries”, overly
8 broad, and unduly burdensome as to time and scope and intended to harass and annoy the
9 Responding Party. Subject to and notwithstanding the foregoing objections, Responding Party
10 responds as follows: Plaintiff does not have any such document in their possession, custody or
11 control.

12 Discovery is ongoing and Responding Party reserves the right to supplement this
13 response.

14 **DEMAND FOR PRODUCTION NO. 6:**

15 All DOCUMENTS that RELATE to YOUR first cause of action against DEFENDANT
16 for sexual battery.

17 **RESPONSE TO DEMAND FOR PRODUCTION NO.6:**

18 Responding Party objects to this request on the grounds that it calls for documents readily
19 available from defendant. Defendant admits sexual assault in the books *Walk this Way* and *Does*
20 *the Noise in My Head Bother You?*, both authored by Defendant. Subject to and notwithstanding
21 the foregoing objections, Responding Party responds as follows: Plaintiff does not have any such
22 document in their possession, custody or control.

23 Discovery is ongoing and Responding Party reserves the right to supplement this
24 response.

25 **DEMAND FOR PRODUCTION NO. 7:**

26 All DOCUMENTS that RELATE to YOUR second cause of action against DEFENDANT
27 for sexual assault.

28 **RESPONSE TO DEMAND FOR PRODUCTION NO.7:**

1 Responding Party objects to this request on the grounds that it calls for documents readily
2 available from defendant. Defendant admits sexual assault in the books *Walk this Way* and *Does*
3 *the Noise in My Head Bother You?*, both authored by Defendant. Subject to and notwithstanding
4 the foregoing objections, Responding Party responds as follows: Plaintiff does not have any such
5 document in their possession, custody or control.

6 Discovery is ongoing and Responding Party reserves the right to supplement this
7 response.

8 **DEMAND FOR PRODUCTION NO. 8:**

9 All DOCUMENTS that RELATE to YOUR third cause of action against DEFENDANT
10 for intentional infliction of emotional distress.

11 **RESPONSE TO DEMAND FOR PRODUCTION NO.8:**

12 Responding Party objects to this request on the grounds that it calls for documents readily
13 available from defendant. Defendant admits sexual assault in the books *Walk this Way* and *Does*
14 *the Noise in My Head Bother You?*, both authored by Defendant. Subject to and notwithstanding
15 the foregoing objections, Responding Party responds as follows: Plaintiff does not have any such
16 document in their possession, custody or control.

17 Discovery is ongoing and Responding Party reserves the right to supplement this
18 response.

19 **DEMAND FOR PRODUCTION NO. 9:**

20 All DOCUMENTS that RELATE to any witness statements in connection with the claims
21 and/or allegations in the COMPLAINT.

22 **RESPONSE TO DEMAND FOR PRODUCTION NO.9:**

23 Responding Party objects to this request on the grounds that it calls
24 for documents readily available from defendant. Witness statements exist within the book *Walk*
25 *this Way* by Aerosmith with Stephen Davis. Subject to and notwithstanding the foregoing
26 objections, Responding Party responds as follows: Plaintiff does not have any such document in
27 their possession, custody or control.

28 Discovery is ongoing and Responding Party reserves the right to supplement this

1 response.

2 **DEMAND FOR PRODUCTION NO. 10:**

3 All DOCUMENTS that RELATE to YOUR allegation that DEFENDANT performed
4 various acts of criminal sexual conduct as alleged in paragraph 11 of YOUR COMPLAINT.

5 **RESPONSE TO DEMAND FOR PRODUCTION NO.10:**

6 Responding Party objects to this request because it seeks information in the possession,
7 custody or control of, known to, or otherwise equally available to the plaintiff. Responding Party
8 further objects to this interrogatory to the extent that it seeks information protected by the
9 attorney-client privilege. Subject to and notwithstanding the foregoing objections, Responding
10 Party responds as follows: Plaintiff does not have any such document in their possession, custody
11 or control.

12 Discovery is ongoing and Responding Party reserves the right to supplement this
13 response.

14 **DEMAND FOR PRODUCTION NO. 11:**

15 All DOCUMENTS that RELATE to DEFENDANT becoming YOUR guardian as alleged
16 in paragraph 14 of the COMPLAINT.

17 **RESPONSE TO DEMAND FOR PRODUCTION NO.11:**

18 Responding Party objects to this request because it seeks information in the possession,
19 custody or control of, known to, or otherwise equally available to the plaintiff. Subject to and
20 notwithstanding the foregoing objections, Responding Party responds as follows: Plaintiff does
21 not have any such document in their possession, custody or control.

22 Discovery is ongoing and Responding Party reserves the right to supplement this
23 response.

24 **DEMAND FOR PRODUCTION NO. 12:**

25 All DOCUMENTS that RELATE to police reports in connection with YOU and
26 DEFENDANT.

27 **RESPONSE TO DEMAND FOR PRODUCTION NO.12:**

28 Responding Party objects to this request because it seeks information in the possession,

1 custody or control of, known to, or otherwise equally available to the plaintiff. Subject to and
2 notwithstanding the foregoing objections, Responding Party responds as follows: Plaintiff does
3 not have any such document in their possession, custody or control.

4 Discovery is ongoing and Responding Party reserves the right to supplement this
5 response.

6 **DEMAND FOR PRODUCTION NO. 13:**

7 All DOCUMENTS that RELATE to COMMUNICATIONS between YOU and the police
8 in connection with DEFENDANT.

9 **RESPONSE TO DEMAND FOR PRODUCTION NO.13:**

10 Responding Party objects to this request because it seeks information in the possession,
11 custody or control of, known to, or otherwise equally available to the plaintiff. Subject to and
12 notwithstanding the foregoing objections, Responding Party responds as follows: Plaintiff is
13 unable to comply because the requested items no longer exist or are not in Plaintiff's possession,
14 custody or control.

15 Discovery is ongoing and Responding Party reserves the right to supplement this
16 response.

17 **DEMAND FOR PRODUCTION NO. 14:**

18 DOCUMENTS sufficient to identify your medications and/or prescriptions from January
19 1, 1973 to the present.

20 **RESPONSE TO DEMAND FOR PRODUCTION NO.14:**

21 Responding Party objects to this interrogatory as it vague, overly broad, and unduly
22 burdensome as to time and scope and intended to harass and annoy the Responding Party.
23 Responding Party further objects as this interrogatory seeks information that is in violation of a
24 party's constitutionally protected right to privacy under Article 1, Section 1 of the California
25 Constitution. Subject to and notwithstanding the foregoing objections, Responding Party
26 responds as follows: Plaintiff does not have any such document in their possession, custody or
27 control.

28 Discovery is ongoing and Responding Party reserves the right to supplement this

1 response.

2 **DEMAND FOR PRODUCTION NO. 15:**

3 All DOCUMENTS that RELATE to the damages you suffered as alleged in YOUR
4 COMPLAINT.

5 **RESPONSE TO DEMAND FOR PRODUCTION NO.15:**

6 Responding Party objects to this interrogatory as it vague, overly broad, and unduly
7 burdensome as to time and scope and intended to harass and annoy the Responding Party.
8 Subject to and notwithstanding the foregoing objections, Responding Party responds as follows:
9 Plaintiff does not have any such document in their possession, custody or control.

10 Discovery is ongoing and Responding Party reserves the right to supplement this
11 response.

12 **DEMAND FOR PRODUCTION NO. 16:**

13 All DOCUMENTS that RELATE to your employment from January 1, 1973 to the
14 present.

15 **RESPONSE TO DEMAND FOR PRODUCTION NO.16:**

16 Responding Party objects to this interrogatory as it vague, overly broad, and unduly
17 burdensome as to time and scope and intended to harass and annoy the Responding Party and
18 not reasonably calculated to lead to the discovery of admissible evidence. Subject to and
19 notwithstanding the foregoing objections, Responding Party responds as follows: Plaintiff does
20 not have any such document in their possession, custody or control.

21 Discovery is ongoing and Responding Party reserves the right to supplement this
22 response.

23 **DEMAND FOR PRODUCTION NO. 17:**

24 All DOCUMENTS that RELATE to YOUR pregnancy, prenatal care and/or the abortion
25 as alleged in paragraphs 15, 16, and/or 17 of YOUR COMPLAINT.

26 **RESPONSE TO DEMAND FOR PRODUCTION NO.17:**

27 Responding Party objects to this request on the grounds that it calls for documents readily
28 available from defendant. Subject to and notwithstanding the foregoing objections, Responding

1 Party responds as follows: Plaintiff is unable to comply because the requested items no longer
2 exist or are not in Plaintiff's possession, custody or control. Plaintiff was a minor child at the time
3 of her pregnancy and under the guardianship of the Defendant. She was further coerced into the
4 abortion at the direction of the Defendant and accordingly such documents are not in Plaintiff's
5 possession.

6 Discovery is ongoing and Responding Party reserves the right to supplement this
7 response.

8 **DEMAND FOR PRODUCTION NO. 18:**

9 All DOCUMENTS that RELATE to the fire in the apartment and/or YOUR loss of
10 consciousness as alleged in paragraph 16 of YOUR COMPLAINT.

11 **RESPONSE TO DEMAND FOR PRODUCTION NO.18:**

12 Responding Party objects to this request on the grounds that it calls for documents readily
13 available from defendant. Subject to and notwithstanding the foregoing objections, Responding
14 Party responds as follows: A copy of the original fire report at 1736 Beacon Street, Brookline,
15 MA from October 23, 1975, is attached to these responses, Bates Numbered Misley v. Tyler –
16 000001 through 000008.

17 Discovery is ongoing and Responding Party reserves the right to supplement this
18 response.

19 **DEMAND FOR PRODUCTION NO. 19:**

20 All DOCUMENTS that RELATE to DEFENDANT'S publications for profit where YOU
21 were mentioned by name, reference, or otherwise.

22 **RESPONSE TO DEMAND FOR PRODUCTION NO.19:**

23 Responding Party objects to this request on the grounds that it calls for documents readily
24 available from defendant. Defendant admits sexual assault in the books *Walk this Way* and *Does*
25 *the Noise in My Head Bother You?*, both authored by Defendant. Subject to and notwithstanding
26 the foregoing objections, Responding Party responds as follows: Plaintiff is unable to comply
27 because the requested items no longer exist or are not in Plaintiff's possession, custody or control.

28 Discovery is ongoing and Responding Party reserves the right to supplement this

1 response.

2 **DEMAND FOR PRODUCTION NO. 20:**

3 All DOCUMENTS that RELATE to the deep emotional harm YOU suffered as alleged in
4 paragraph 19 of YOUR COMPLAINT.

5 **RESPONSE TO DEMAND FOR PRODUCTION NO.20:**

6 Responding Party objects to this interrogatory as it vague, overly broad, and unduly
7 burdensome as to time and scope and intended to harass and annoy the Responding Party.
8 Subject to and notwithstanding the foregoing objections, Responding Party responds as follows:
9 Plaintiff does not have any such document in their possession, custody or control.

10 Discovery is ongoing and Responding Party reserves the right to supplement this
11 response.

12 **DEMAND FOR PRODUCTION NO. 21:**

13 All DOCUMENTS that RELATE to the tabloids with YOUR picture as alleged in
14 paragraph 21 of YOUR COMPLAINT.

15 **RESPONSE TO DEMAND FOR PRODUCTION NO.21**

16 Responding Party objects to this interrogatory as it vague, overly broad, and unduly
17 burdensome as to time and scope and intended to harass and annoy the Responding Party.
18 Subject to and notwithstanding the foregoing objections, Responding Party responds as follows:
19 A copy of the Star Magazine report dated February 14, 2011 is attached to these responses, Bates
20 Numbered Misley v. Tyler – 000009 through 000011.

21 Discovery is ongoing and Responding Party reserves the right to supplement this
22 response.

23 **DEMAND FOR PRODUCTION NO. 22:**

24 All DOCUMENTS that RELATE to COMMUNICATIONS between YOU and each of
25 YOUR health care providers from January 1, 1973 to the present.

26 **RESPONSE TO DEMAND FOR PRODUCTION NO.22**

27 Responding Party objects to this interrogatory as it vague, overly broad, and unduly
28 burdensome as to time and scope and intended to harass and annoy the Responding Party.

1 Subject to and notwithstanding the foregoing objections, Responding Party responds as follows:
2 Plaintiff does not have any such document in their possession, custody or control.

3 Discovery is ongoing and Responding Party reserves the right to supplement this
4 response.

5 **DEMAND FOR PRODUCTION NO. 23:**

6 All DOCUMENTS that RELATE to COMMUNICATIONS between YOU and each of
7 YOUR therapists from January 1, 1973 to the present.

8 **RESPONSE TO DEMAND FOR PRODUCTION NO.23**

9 Responding Party objects to this interrogatory as it vague, overly broad, and unduly
10 burdensome as to time and scope and intended to harass and annoy the Responding Party.
11 Subject to and notwithstanding the foregoing objections, Responding Party responds as follows:
12 Plaintiff does not have any such document in their possession, custody or control.

13 Discovery is ongoing and Responding Party reserves the right to supplement this
14 response.

15 **DEMAND FOR PRODUCTION NO. 24:**

16 All DOCUMENTS that RELATE to YOUR payment of any medical bills from January 1,
17 1973 to the present.

18 **RESPONSE TO DEMAND FOR PRODUCTION NO.24:**

19 Responding Party objects to this interrogatory as it vague, overly broad, and unduly
20 burdensome as to time and scope and intended to harass and annoy the Responding Party.
21 Responding Party further objects as this interrogatory seeks information that is in violation of a
22 party's constitutionally protected right to privacy under Article 1, Section 1 of the California
23 Constitution. Subject to and notwithstanding the foregoing objections, Responding Party
24 responds as follows: Plaintiff does not have any such document in their possession, custody or
25 control.

26 Discovery is ongoing and Responding Party reserves the right to supplement this
27 response.

28 **DEMAND FOR PRODUCTION NO. 25:**

1 All DOCUMENTS sufficient to identify YOUR health care providers from January 1,
2 1973 to the present.

3 **RESPONSE TO DEMAND FOR PRODUCTION NO.25:**

4 Responding Party objects to this interrogatory as it vague, overly broad, and unduly
5 burdensome as to time and scope and intended to harass and annoy the Responding Party.
6 Subject to and notwithstanding the foregoing objections, Responding Party responds as follows:
7 Plaintiff does not have any such document in their possession, custody or control.

8 Discovery is ongoing and Responding Party reserves the right to supplement this
9 response.

10 **DEMAND FOR PRODUCTION NO. 26:**

11 All DOCUMENTS that RELATE to YOUR efforts to obtain employment from January 1,
12 1973 to the present.

13 **RESPONSE TO DEMAND FOR PRODUCTION NO.26:**

14 Responding Party objects to this interrogatory as it vague, overly broad, and unduly
15 burdensome as to time and scope and intended to harass and annoy the Responding Party and
16 not reasonably calculated to lead to the discovery of admissible evidence.

17 Discovery is ongoing and Responding Party reserves the right to supplement this
18 response.

19 **DEMAND FOR PRODUCTION NO. 27:**

20 All DOCUMENTS that RELATE to YOUR medical bills from January 1, 1973 to the
21 present.

22 **RESPONSE TO DEMAND FOR PRODUCTION NO.27:**

23 Responding Party objects to this interrogatory as it vague, overly broad, and unduly
24 burdensome as to time and scope and intended to harass and annoy the Responding Party.
25 Responding Party further objects as this interrogatory seeks information that is in violation of a
26 party's constitutionally protected right to privacy under Article 1, Section 1 of the California
27 Constitution. Subject to and notwithstanding the foregoing objections, Responding Party
28 responds as follows: Plaintiff does not have any such document in their possession, custody or

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control.

Discovery is ongoing and Responding Party reserves the right to supplement this response.

JEFF ANDERSON & ASSOCIATES, P.A.

DATED: April 24, 2023

By: 

Michael Reck
*Attorneys for Plaintiff JULIA MISLEY F/K/A
JULIA HOLCOMB*

VERIFICATION (C.C.P. 446 AND 2015.5)

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I have read the foregoing PLAINTIFF JULIA MISLEY'S RESPONSES TO DEFENDANT STEVEN TYLER'S DEMAND FOR PRODUCTION OF DOCUMENTS, SET ONE and know its contents.

CHECK APPLICABLE PARAGRAPHS

I am a party to this action. The matters stated in the foregoing document are true of my own knowledge, except as to those matters which are stated on information and belief, and as to those matters, I believe them to be true.

I am an officer a partner a of

a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason.

I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

The matters stated in the foregoing document are true of my own knowledge, except as to those matters which are stated on information and belief, and as to those matters, I believe them to be true.

I am one of the attorneys for a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed on (date) at California.

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

JULIA MISLEY F/K/A JULIA HOLCOMB Type or Print Name

Julia Misley Signature

PROOF OF SERVICE CCP 1013a(3) Revised 5 1 88

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of State of California. I am over the age of 18 and not a party to the within action; my business address is

On (date) **I served the foregoing document described as on in this action

by placing the true copies thereof enclosed in sealed envelopes addressed as stated on the attached mailing list: by placing the original a true copy thereof enclosed in sealed envelopes addressed as follows:

BY MAIL

I deposited such envelope in the mail at California. The envelope was mailed with postage thereon fully prepaid.

As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day, with postage thereon fully prepaid at California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

Executed on (date) at California.

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

SEE ATTACHED PROOF O SERVICE

Type or Print Name

Signature

*(BY MAIL. SIGNATURE MUST BE OF PERSON DEPOSITING ENVELOPE IN MAIL SLOT. BOX OR BAG) **FOR PERSONAL SERVICE. SIGNATURE MUST BE THAT OF MESSENGER)

ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NO: 209,895 NAME: MICHAEL RECK, ESQ. FIRM NAME: JEFF ANDERSON & ASSOCIATES, P.A. STREET ADDRESS: 12011 SAN VICENTE BLVD., STE 700 CITY: LOS ANGELES STATE: CA ZIP CODE: 90049 TELEPHONE NO.: 310-357-2425 FAX NO.: 651-297-6543 E-MAIL ADDRESS: mreck@andersonadvocates.com ATTORNEY FOR (name): Plaintiff Julia Misley F/K/A Julia Holcomb	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 825 MAPLE AVE MAILING ADDRESS: SAME CITY AND ZIP CODE: TORRANCE 90503 BRANCH NAME: TORRANCE COURTHOUSE	CASE NUMBER: 22TRCV01604
PLAINTIFF/PETITIONER: JULIA MISLEY, formerly known as JULIA DEFENDANT/RESPONDENT: STEVEN VICTOR TALLARICO A/K/A STEVEN TYLER	JUDICIAL OFFICER: Hon. Gary Y. Tanaka
PROOF OF ELECTRONIC SERVICE	DEPARTMENT: B

1. I am at least 18 years old.

- a. My residence or business address is (specify):
 12011 SAN VICENTE BLVD.
 STE 700
 LOS ANGELES, CA 90049
- b. My electronic service address is (specify):
 KRYSTAL.PAZANTI@ANDERSONADVOCATES.COM

2. I electronically served the following documents (exact titles):

PLAINTIFF JULIA MISLEY'S RESPONSE TO DEFENDANT STEVEN TYLER'S DEMAND FOR PRODUCTION OF DOCUMENTS, SET ONE

The documents served are listed in an attachment. (Form POS-050(D)/EF5-050(D) may be used for this purpose.)

3. I electronically served the documents listed in 2 as follows:

- a. Name of person served: SHAWN HOLLEY
 On behalf of (name or names of parties represented, if person served is an attorney):
 DEFENDANT STEVEN TYLER
- b. Electronic service address of person served :
 SHOLLEY@KWIKHLAW.COM
- c. On (date): 4/24/2023

The documents listed in item 2 were served electronically on the persons and in the manner described in an attachment. (Form POS-050(P)/EF5-050(P) may be used for this purpose.)

Date: 4/24/2023

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

KRYSTAL PAZANTI

 (TYPE OR PRINT NAME OF DECLARANT)



 (SIGNATURE OF DECLARANT)

KINSELLA WEITZMAN ISER KUMP HOLLEY LLP
11766 WILSHIRE BOULEVARD, SUITE 750
LOS ANGELES, CA 90025
TEL 310.566.9800 • FAX 310.566.9850

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 11766 Wilshire Boulevard, Suite 750, Los Angeles, CA 90025.

On April 28, 2023, I served true copies of the following document(s) described as **DECLARATION OF KATHERINE T. KLEINDIENST IN SUPPORT OF DEFENDANT’S NOTICE OF SPECIAL MOTION TO STRIKE AND SPECIAL MOTION TO STRIKE PORTIONS OF PLAINTIFF’S FIRST AMENDED COMPLAINT PURSUANT TO CODE OF CIVIL PROCEDURE § 425.16 AND FOR ATTORNEYS’ FEES** on the interested parties in this action as follows:

Michael Reck
mreck@andersonadvocates.com
JEFF ANDERSON & ASSOCIATES PA
12011 San Vincente Blvd., Suite 700
Los Angeles, CA 90049

Attorneys for Plaintiff Julia Misley

Karen Barth Menzies
kbm@kbmlaw.com
KBM Law Corp.
6701 Center Drive West, Suite 1400
Los Angeles, CA 90045

Attorneys for Plaintiff Julia Misley

BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with the practice of Kinsella Weitzman Iser Kump Holley LLP for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

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

Executed on April 28, 2023, at Los Angeles, California.

/s/ Michelle Law

Michelle Law