

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

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Superior Court of California,  
County of Los Angeles  
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David W. Slayton,  
Executive Officer/Clerk of Court,  
By Y. Ayala, Deputy Clerk

5 *Attorneys for Plaintiff Linda Ridgway-Whitedeer*  
6

7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
8 **COUNTY OF LOS ANGELES**

9 LINDA RIDGWAY-WHITEDEER

Case No. **23ST CV 21952**

10 Plaintiff,

**COMPLAINT FOR DAMAGES for:**

11 v.

- 1) **SEXUAL ASSAULT;**
- 2) **SEXUAL BATTERY;**
- 3) **NEGLIGENCE; and,**
- 4) **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

12 WILLIAM COSBY, JR.; JEMMIN, INC.,  
WILLIAM MORRIS ENDEAVOR  
13 ENTERTAINMENT, LLC f/k/a WILLIAM  
MORRIS AGENCY and DOES 1-20,

14 Defendants.

**DEMAND FOR JURY TRIAL**

15  
16 Plaintiff LINDA RIDGEWAY-WHITEDEER bring this action against Defendants  
17 WILLIAM COSBY, JR.; JEMMIN, INC., WILLIAM MORRIS ENDEAVOR  
18 ENTERTAINMENT, LLC f/k/a WILLIAM MORRIS AGENCY and DOES 1-20 (collectively,  
19 “Defendants”), and based on information and belief alleges as follows:

20 **INTRODUCTION**

21 1. This case is about a prominent actor and comedian who used his notoriety and status  
22 to sexually assault an actress, Plaintiff herein, and the world-renowned talent agency representing  
23 him throughout his career and at the time of the sexual assault committed against Plaintiff.  
24 Defendant William “Bill” Cosby utilized his power and authority over Plaintiff to sexually assault  
25 Plaintiff. At the time of the sexual assault, both Plaintiff and Defendant were represented by the  
26 William Morris Agency. At the time of the sexual assault, the William Morris Agency knew, or  
27 should have had knowledge of Defendant’s repeated acts of sexual assault. Plaintiff has suffered  
28 severe emotional, physical, and psychological distress as a result of the sexual assault. Plaintiff

1 brings this action to hold Defendants accountable for the harm they have caused her.

2 **JURISDICTION AND VENUE**

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

6 3. Venue is proper in this Court under Code of Civil Procedure section 395 because  
7 Plaintiff resides in Los Angeles County. In addition, a substantial part of the conduct and omissions  
8 giving rise to the violations of law alleged herein occurred in Los Angeles County.

9 **PARTIES**

10 4. Plaintiff is an adult female currently residing in Los Angeles County, California.  
11 At the time of the assault by Defendant Cosby, Plaintiff was a resident of California. The sexual  
12 assault occurred in Los Angeles, California, in Los Angeles County.

13 5. Upon information and belief, Defendant Cosby is an individual residing in Franklin  
14 County, Massachusetts. At all times mentioned herein, Defendant Cosby is and was an actor and  
15 stand-up comedian.

16 6. Upon information and belief, Defendant Jemmin, Inc (“Jemmin”) is a corporation  
17 incorporated in California, with its principal place of business in Orlando, FL. Defendant, Cosby is  
18 the chief executive officer of Jemmin and upon information and belief, a unity of interest and  
19 ratification of action exists between Jemmin and Defendant Cosby such that a conspiracy to aid in  
20 the acts subject of this Complaint existed.

21 7. Upon information and belief, William Morris Endeavor Entertainment, LLC, while  
22 consisting of multiple office locations around the world, is a limited liability company incorporated  
23 in Delaware and based in Beverly Hills, California. In approximately 2009, the William Morris  
24 Agency and Endeavor agreed to a merger. The agency adopted the moniker William Morris  
25 Endeavor (WME). Accordingly, WME is the successor in interest and in law. All allegations herein  
26 regarding William Morris Agency are applicable and interchangeable as to WME.

27 8. The true names and capacities, whether individual, corporate, partnership, associate,  
28 or otherwise, of Defendants DOES 1–20, inclusive, are unknown to Plaintiff. Accordingly, Plaintiff

1 sues DOES 1–20 by such fictitious names pursuant to section 474 of the California Code of Civil  
2 Procedure. Plaintiff will seek leave to amend this Complaint to allege their true names and  
3 capacities when they are ascertained. Plaintiff is informed and believes and thereon alleges that  
4 DOES 1–20 are legally responsible in some manner for the events, happenings, and/or tortious and  
5 unlawful conduct that caused the injuries and damages alleged in this Complaint.

6 9. On information and belief, at all times material hereto, Defendants were the agents,  
7 representatives, servants, employees, partners, and/or joint venturers of each and every other  
8 Defendant and were acting within the course and scope of said alternative capacity, identity, agency,  
9 representation and/or employment and were within the scope of their authority, whether actual or  
10 apparent. Each of the Defendants are responsible in some manner for one or more of the events and  
11 happenings described herein. Each Defendant approved and/or ratified the conduct of each other  
12 Defendant. Consequently, each Defendant is jointly and severally liable to Plaintiff for the damages  
13 sustained as a proximate result of his, her, or its conduct. Each of the Defendants proximately  
14 caused the injuries and damages alleged.

15 10. Whenever reference is made to “Defendants” in this Complaint, such allegation shall  
16 be deemed to mean the acts of Defendants acting individually, jointly, and/or severally.

17 11. The sexual harassment, assault, and battery Plaintiff was subjected to took place in  
18 approximately 1971, Plaintiff can now bring her claims pursuant to the Sexual Abuse and Cover Up  
19 Accountability Act, AB2777. California Civil Procedure Code § 340.16(e) provides that a claim  
20 seeking to recover damages suffered as a result of a sexual assault that occurred on or after a  
21 plaintiff’s 18th birthday otherwise barred may be brought subject to this act at this time.

22 **GENERAL FACTUAL ALLEGATIONS**

23 12. At all times material, Defendant Cosby was a prominent actor and comedian.  
24 Defendant Cosby started his career in stand-up comedy in the 1960s and rose to fame as a  
25 comedian and actor.

26 13. In approximately 1971, Plaintiff had already participated in multiple cold reads and  
27 auditions in the context of her career as a working actor.

28 14. At the time, Plaintiff was represented by the William Morris Agency. Defendant

1 Cosby was also represented by the William Morris Agency in approximately 1971 and was  
2 represented by the agency for a total of 48 years (until 2012).

3 15. Upon information and belief, Defendant Cosby reached out to the William Morris  
4 Agency directly, requesting Plaintiff audition for a film project Defendant Cosby was starring in  
5 entitled “Hickey and Boggs”.

6 16. Plaintiff arrived at the filming location in Los Angeles anticipating a meeting with  
7 the director and other individuals generally involved in the casting process, similar to her  
8 experience on previous auditions and the standard practice in the industry at the time. Immediately  
9 upon her arrival, Plaintiff was met by Defendant Cosby and quickly ushered into the empty  
10 director’s office. As Plaintiff was standing in the doorway to the office, Defendant Cosby stated in  
11 a commanding voice, “Have a seat!.” Upon entering the office, Plaintiff observed an empty  
12 swivel chair abutting the door, so close that it required moving in order to enter the room.

13 17. As Plaintiff sat down, realizing she would have to move the chair to where the desk  
14 was located, Plaintiff looked down to place her purse on her lap while grasping her portfolio.  
15 Before she could relocate the chair to the desk, Plaintiff felt Defendant Cosby’s hand grab her hair  
16 behind her head. Defendant Cosby was facing Plaintiff with his back to the now closed door, so  
17 that if anyone were to enter, they would not be able to see what was happening within. As Plaintiff  
18 looked up, she observed Defendant Cosby had removed his penis from his pants and before  
19 Plaintiff could react, Defendant Cosby forced his penis into Plaintiff’s mouth before ultimately  
20 ejaculating on her face, clothing and hair.

21 18. Plaintiff, unable to breathe and in shock from what had just transpired, was unable  
22 to react. Defendant Cosby used a tissue to attempt to wipe his semen from Plaintiff’s face.

23 19. Still in shock, Plaintiff was escorted to her car by Defendant Cosby. As she gripped  
24 the steering wheel, cheeks streaked with tears, Defendant Cosby, still next to the car, quickly  
25 retreated, passing in front of Plaintiff’s car as he walked away.

26 20. Over time, Defendant Cosby covered up his multiple sexual assaults.

27 21. Defendant Cosby engaged in a similar pattern of conduct with his victims,  
28 including expressing interest in advancing their careers.

1 22. Defendant Cosby was found guilty of three counts of aggravated indecent assault in  
2 2018 in Montgomery County, Pennsylvania, and sentenced to three to ten years in prison. His  
3 conviction was overturned in 2021 by the Pennsylvania Supreme Court based on a prior  
4 prosecution agreement not to charge Defendant Cosby.

5 23. In June 2022, Defendant Cosby was found civilly liable in Santa Monica,  
6 California, for the sexual assault of a minor female.

7 **FIRST CAUSE OF ACTION**  
8 **SEXUAL ASSAULT (Cal. Civ. Code § 340.16)**  
9 **(as to DEFENDANTS COSBY and DOES 1-20)**

10 24. Plaintiff incorporates the allegations contained in the preceding paragraphs as though  
11 fully set forth herein.

12 25. Defendant Cosby committed a sexual assault, as defined in Civil Code §340.16(b)(1)  
13 (referencing sections of the California Penal Code).

14 26. Defendant Cosby committed assault with the intent to commit the crimes delineated  
15 in the above-referenced sections of the California Penal Code.

16 27. Defendant Cosby's actions identified in this complaint were his attempts to commit  
17 the crimes delineated in the above-referenced sections of the California Penal Code.

18 28. Defendant Cosby's conduct as described in this complaint was done with oppression,  
19 fraud, and/or malice.

20 **SECOND CAUSE OF ACTION**  
21 **SEXUAL BATTERY (CIVIL CODE § 1708.5)**  
22 **(as to DEFENDANTS COSBY and DOES 1-20)**

23 29. Plaintiff incorporates the allegations contained in the preceding paragraphs as though  
24 fully set forth herein.

25 30. Plaintiff brings this claim for sexual battery under California Civil Code § 1708.5  
26 against Defendant Cosby in his individual capacity.

27 31. Defendant Cosby willfully violated Plaintiff's statutory right to be free from sexual  
28 battery, including forcing Plaintiff to orally copulate Defendant's penis without her consent.

29 32. Defendant Cosby's sexual assault of Plaintiff was deeply offensive to her personal  
30 dignity and would offend a person of ordinary sensitivity.

1           33. Defendant Cosby committed these acts with intent to cause harmful or offensive  
2 contact with Plaintiff's person.

3           34. By intentionally subjecting Plaintiff to sexual assault, Defendant Cosby acted  
4 maliciously and in a manner that is deeply offensive to human dignity.

5           35. As a direct, proximate, and foreseeable result of Defendant Cosby's unlawful  
6 conduct, Plaintiff has suffered severe humiliation, mental anguish, emotional distress,  
7 embarrassment, anger, loss of enjoyment of life, loss of earnings and earning capacity, and has been  
8 injured in mind and body, the precise amount of which will be proven at trial.

9           36. As a direct, proximate, and foreseeable result of Defendant Cosby's unlawful  
10 conduct, Plaintiff has incurred special and general damages, the precise amount of which will be  
11 proven at trial.

12           37. Defendant Cosby acted maliciously and oppressively, and his conduct constitutes  
13 conscious disregard for Plaintiff's rights and safety, entitling her to punitive damages.

14   **THIRD CAUSE OF ACTION**  
15   **NEGLIGENCE**  
16   **(Against all DEFENDANTS)**

17           38. Plaintiff incorporates the allegations contained in the preceding paragraphs as  
18 though fully set forth herein.

19           39. Defendants owed Plaintiff a duty of care generally and additionally because of the  
20 employment dynamic and power status of defendant Cosby. Defendants and their agents had a duty  
21 to not subject Plaintiff to discrimination, harassment, sexual assault, sexual battery, and retaliation.

22           40. Defendants breached their duties to Plaintiff by subjecting Plaintiff to the sexual  
23 assault alleged herein. Defendants' further failures include, but are not limited to, failing to properly  
24 supervise Defendant Cosby, failing to properly supervise, warn and protect Plaintiff, and failing to  
25 implement any procedures or complaint processes for employees to report or seek refuge from  
26 sexual harassment. Defendants further breached their duty to Plaintiff by covering up and  
27 empowering Defendant Cosby during his pattern of prior and ongoing sexual assaults of Plaintiff  
28 and others.

          41. Defendants breached their duty owed to Plaintiff which directly caused Plaintiff's

1 injuries.

2 42. As a direct result of Defendants' negligent conduct, Plaintiff has suffered severe  
3 emotional, physical, and psychological distress including but not limited to anxiety, depression,  
4 nightmares, humiliation, fear and career intimidation.

5 **FOURTH CAUSE OF ACTION**  
6 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
7 **(Against all DEFENDANTS)**

8 43. Plaintiff incorporates the allegations contained in the preceding paragraphs as  
9 though fully set forth herein.

10 44. Defendants engaged in extreme and outrageous conduct toward Plaintiff with the  
11 intention to cause, or with reckless disregard for the probability of causing, Plaintiff to suffer  
12 severe emotional distress.

13 45. Defendant Cosby has engaged in a long-standing pattern of trickery, deceit, coerce  
14 and force against women so as to render the Plaintiff unable to consent.

15 46. Defendant WME had knowledge of or should have known about Defendant  
16 Cosby's pattern of trickery, deceit, coerce and force against women and failed to warn, protect and  
17 prevent Defendant Cosby's sexual assault of Plaintiff.

18 47. Defendant WME instead chose to profit from defendant Cosby's Intentional  
19 Infliction of Emotional Distress of Plaintiff and thus conspired with defendant Cosby to allow him  
20 to engage in the predation of Plaintiff and countless others before Plaintiff's sexual assault and  
21 after.

22 48. As a direct and proximate result of the outrageous and extreme conduct of  
23 Defendants in engaging in, and allowing to occur, the sexual assault and sexual battery of Plaintiff,  
24 Plaintiff has suffered severe emotional, physical, and psychological distress including but not  
25 limited to anxiety, depression, nightmares, humiliation, fear and career intimidation.

26 49. As a direct, proximate, and foreseeable result of Defendants' unlawful conduct,  
27 Plaintiff has incurred special and general damages, the exact amount of which will be proven at trial.

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**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff requests that the Court enter a judgment awarding the following relief:

- (1) General damages according to proof;
- (2) Special damages, including but not limited to medical and incidental expenses and loss of earnings and earning capacity according to proof;
- (3) Punitive damages, as permitted by law;
- (4) Attorneys' fees pursuant to Code of Civil Procedure Section 1021.5, or otherwise as permitted by law;
- (5) Costs of suit;
- (6) Prejudgment interest as permitted by law; and
- (7) Such other relief as the Court deems proper.

DATED: September 12, 2023

**JEFF ANDERSON & ASSOCIATES PA**



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MICHAEL RECK  
Jeff Anderson & Associates,  
Attorneys for Plaintiff



**JEFF ANDERSON AND ASSOCIATES**  
12011 San Vicente Boulevard, Suite 700  
Los Angeles, California 90049  
Telephone: (310) 357-2425 | Facsimile: (651) 297-6543

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**DEMAND FOR JURY TRIAL**

A trial by jury is hereby demanded by Plaintiff.

DATED: September 12, 2023

**JEFF ANDERSON & ASSOCIATES PA**

*Mike Reck*

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MICHAEL RECK  
Jeff Anderson & Associates,  
Attorneys for Plaintiff