

<p>ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Steven A. Schuman SBN: 142834 Leonard, Dicker & Schreiber LLP 10940 Wilshire Boulevard, Suite 2100 Los Angeles, CA 90024-3963 TELEPHONE NO.: 310-551-1987 FAX NO. (Optional): 310-277-8050 E-MAIL ADDRESS (Optional): sschuman@ldsllaw.com ATTORNEY FOR (Name): Defendants</p>	<p>FOR COURT USE ONLY Electronically FILED by Superior Court of California, County of Los Angeles 2/02/2024 10:39 AM David W. Slayton, Executive Officer/Clerk of Court, By E. Thomas, Deputy Clerk</p>
<p>SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 312 West Spring Street MAILING ADDRESS: 312 West Spring Street CITY AND ZIP CODE: Los Angeles 90012 BRANCH NAME: Spring Street Courthouse</p>	
<p>PLAINTIFF/PETITIONER: TALIA JACKSON, et al. DEFENDANT/RESPONDENT: MELISSA BACELAR, et al.</p>	<p>CASE NUMBER: 22STCV20771 JUDICIAL OFFICER: Hon. Stuart M. Rice</p>
<p align="center">NOTICE OF RELATED CASE</p>	<p>DEPT.: 1</p>

Identify, in chronological order according to date of filing, all cases related to the case referenced above.

1.
 - a. Title: Melissa Bacelar, et al. v. Kim Sill, et al.
 - b. Case number: 24STCV01638
 - c. Court: same as above
 other state or federal court (name and address):
 - d. Department: 34 at Stanley Mosk Courthouse
 - e. Case type: limited civil unlimited civil probate family law other (specify):
 - f. Filing date: January 22, 2024
 - g. Has this case been designated or determined as "complex?" Yes No
 - h. Relationship of this case to the case referenced above (check all that apply):
 - involves the same parties and is based on the same or similar claims.
 - arises from the same or substantially identical transactions, incidents, or events requiring the determination of the same or substantially identical questions of law or fact.
 - involves claims against, title to, possession of, or damages to the same property.
 - is likely for other reasons to require substantial duplication of judicial resources if heard by different judges.
 - Additional explanation is attached in attachment 1h
 - i. Status of case:
 - pending
 - dismissed with without prejudice
 - disposed of by judgment

2.
 - a. Title:
 - b. Case number:
 - c. Court: same as above
 other state or federal court (name and address):
 - d. Department:

PLAINTIFF/PETITIONER: TALIA JACKSON, et al. DEFENDANT/RESPONDENT: MELISSA BACELAR, et al.	CASE NUMBER: 22STCV20771
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2. (continued)

- e. Case type: limited civil unlimited civil probate family law other (specify):
- f. Filing date:
- g. Has this case been designated or determined as "complex?" Yes No
- h. Relationship of this case to the case referenced above (check all that apply):
 - involves the same parties and is based on the same or similar claims.
 - arises from the same or substantially identical transactions, incidents, or events requiring the determination of the same or substantially identical questions of law or fact.
 - involves claims against, title to, possession of, or damages to the same property.
 - is likely for other reasons to require substantial duplication of judicial resources if heard by different judges.
 - Additional explanation is attached in attachment 2h
- i. Status of case:
 - pending
 - dismissed with without prejudice
 - disposed of by judgment

3. a. Title:

b. Case number:

c. Court: same as above
 other state or federal court (name and address):

d. Department:

e. Case type: limited civil unlimited civil probate family law other (specify):

f. Filing date:

g. Has this case been designated or determined as "complex?" Yes No

h. Relationship of this case to the case referenced above (check all that apply):

- involves the same parties and is based on the same or similar claims.
- arises from the same or substantially identical transactions, incidents, or events requiring the determination of the same or substantially identical questions of law or fact.
- involves claims against, title to, possession of, or damages to the same property.
- is likely for other reasons to require substantial duplication of judicial resources if heard by different judges.
- Additional explanation is attached in attachment 3h

i. Status of case:

- pending
- dismissed with without prejudice
- disposed of by judgment

4. Additional related cases are described in Attachment 4. Number of pages attached: _____

Date: January 23, 2024

Steven A. Schuman
 (TYPE OR PRINT NAME OF PARTY OR ATTORNEY)

▶ *Steve Schuman*
 (SIGNATURE OF PARTY OR ATTORNEY)

PLAINTIFF/PETITIONER: TALIA JACKSON, et al.	CASE NUMBER: 22STCV20771
DEFENDANT/RESPONDENT: MELISSA BACELAR, et al.	

**PROOF OF SERVICE BY FIRST-CLASS MAIL
NOTICE OF RELATED CASE**

(NOTE: You cannot serve the Notice of Related Case if you are a party in the action. The person who served the notice must complete this proof of service. The notice must be served on all known parties in each related action or proceeding.)

1. I am at least 18 years old and **not a party to this action**. I am a resident of or employed in the county where the mailing took place, and my residence or business address is (*specify*): 10940 Wilshire Boulevard, Suite 2100, Los Angeles, CA 90024-3963

2. I served a copy of the *Notice of Related Case* by enclosing it in a sealed envelope with first-class postage fully prepaid and (*check one*):
 - a. deposited the sealed envelope with the United States Postal Service.
 - b. placed the sealed envelope for collection and processing for mailing, following this business's usual practices, with which I am readily familiar. On the same day correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service.

3. The *Notice of Related Case* was mailed:
 - a. on (*date*): January 23, 2024
 - b. from (*city and state*): Los Angeles, CA

4. The envelope was addressed and mailed as follows:

<ol style="list-style-type: none"> a. Name of person served: Kimberly A. Wright, Esq. Street address: 2601 Main Street, Suite 1200 City: Irvine State and zip code: California 92614 b. Name of person served: Jill L. Ryther, Esq. Street address: 5777 W. Century Bl., #1110-3076 City: Los Angeles State and zip code: California 90045 	<ol style="list-style-type: none"> c. Name of person served: Street address: City: State and zip code: d. Name of person served: Street address: City: State and zip code:
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Names and addresses of additional persons served are attached. (*You may use form POS-030(P).*)

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

Date: January 23, 2024

Peggy Young
(TYPE OR PRINT NAME OF DECLARANT)


 (SIGNATURE OF DECLARANT)

**PROOF OF SERVICE BY FIRST-CLASS MAIL
NOTICE OF RELATED CASE (Continued)**

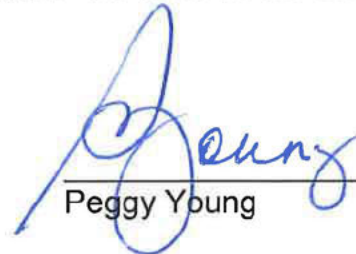
1. I am at least 18 years old and **not a party to this action**. I am a resident of or employed in the county where the mailing took place, and my residence or business address is 10940 Wilshire Boulevard, Suite 2100, Los Angeles, California 90024-3963.
2. I served a copy of the *Notice of Related Case* by enclosing it in a sealed envelope with first-class postage fully prepaid and placed the sealed envelope for collection and processing for mailing, following this business's usual practices, with which I am readily familiar. On the same day correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service.
3. The *Notice of Related Case* was mailed on January 23, 2024 from Los Angeles, CA.
4. The envelope was addressed and mailed as follows:

Jason A. Ibey, Esq.
Kazerouni Law Group, APC
321 North Mall Drive
Suite R108
St. George, UT 84790

Pamela E. Prescott, Esq.
Gil Melili, Esq.
Kazerouni Law Group, APC
245 Fischer Avenue
Suite D1
Costa Mesa, CA 92626

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

Dated: January 23, 2024



Peggy Young

SHORT TITLE: TALIA JACKSON, et al. v. MELISSA BACELAR, et al.	CASE NUMBER: 22STCV20771
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ATTACHMENT (Number): 1h*(This Attachment may be used with any Judicial Council form.)*

The low numbered case is Jackson v. Bacelar, LASC Case No. 22STCV20771. Attorney Kimberly Wright immediately posted the Complaint in that case was on a website created for that purpose, Thetruthaboutwagmorpets.com. Subsequently, Wright and others widely shared the Complaint, as well as some of the more salacious allegations contained in the Complaint, through various Instagram accounts, including but by no means limited to @thetruthaboutwagmorpets and @Shelterhope_Petshop.

Defendants have long complained to this Court about the manner in which Plaintiffs in the low number case, and their allies, e.g., their former counsel Kimberly Wright, have attempted to litigate on social media, and how they have used the low number case to create the appearance of a litigation privilege to shield them from liability. Defendants' First Affirmative Defense in the low number case asserts what amounts to a cause of action for defamation, as an offset.

Recent events, however, have convinced Wagmor and Melissa Bacelar that it is necessary and appropriate to file an affirmative claim. Specifically, in January of 2024, Kim Sill (who is mentioned by name in the First Affirmative Defense) and two others (who are apparently part of, or associated with, @thetruthaboutwagmorpets) contacted a 13-year old Instagram influencer, and attempted to recruit him as the face of their attack on Wagmor. These individuals sent multiple messages to the minor in question, and told him all sorts of outrageous lies about Wagmor and Bacelar. Among other things, they told the minor that Wagmor and Bacelar are stalking him, and that certain anonymous harassing emails the minor received had been traced to Wagmor's IP address. They further told the minor that the white Mercedes, which the minor believes is following him, belongs to Bacelar. Sill and her accomplices then provided the Minor with suggested posts to make on Instagram.

This resulted in the minor making several posts in which he accused Wagmor and Bacelar of, among other things, stalking him and threatening to kill him. Subsequently, the minor's parents discovered that their son had been misled and manipulated, and put an end to the posting. They used the minor's account to disown the minor's earlier posts. In their words, their son was "coached and lied to by a trusted adult," referring to Kim Sill, among others. Sill and Thetruthaboutwagmorpets.com then denied contacting the minor at all, falsely claiming that their accounts were "hacked" and implying that Bacelar and Wagmor were responsible.

On January 22, 2024, Bacelar and Wagmor filed Bacelar v. Sill, LASC Case No. 24STCV01638. At present, the named defendants are Kim Sill, along with Faith Ballin and Matt Friedman. These are the individuals known to have contacted the minor directly. In addition, @thetruthaboutwagmorpets was used. Bacelar and Wagmor intend to take discovery to determine who else was involved in the various postings and wrongful acts, and anticipate that the Complaint will be amended to add various parties, possibly including Kimberly Wright, Jilly Ryther, Talia Jackson, Nathan Alfano and Kristen Moore.

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 1 of 1*(Add pages as required)*