

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Richard B. Kendall (90072); Nary Kim (293639) KENDALL BRILL & KELLY LLP 10100 Santa Monica Boulevard, Suite 1725 Los Angeles, CA 90067  TELEPHONE NO.: 310-556-2700 FAX NO. (Optional): 310-556-2705 EMAIL ADDRESS (Optional): rkendall@kbfkfirm.com; nkim@kbfkfirm.com ATTORNEY FOR (Name): Defendant Paramount Pictures Corporation	FOR COURT USE ONLY  <b>Electronically FILED by                  Superior Court of California,                  County of Los Angeles                  3/22/2024 3:23 PM                  David W. Slayton,                  Executive Officer/Clerk of Court,                  By S. Bolden, Deputy Clerk</b>
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES</b> STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: 111 N. Hill Street CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Central District - Stanley Mosk Courthouse	
PLAINTIFF/PETITIONER: Olivia Hussey and Leonard Whiting  DEFENDANT/RESPONDENT: Paramount Pictures Corp., et al.	CASE NUMBER: 24STCV03814  JUDICIAL OFFICER: Holly J. Fujie
<b>NOTICE OF RELATED CASE</b>	DEPT.: 56

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

1.
  - a. Title: Leonard Whiting and Olivia Hussey v. Paramount Pictures Corporation, and Does 1 to 100
  - b. Case number: 22SMCV02968
  - c. Court:  same as above  
 other state or federal court (name and address): LASC - West District, 9355 Burton Way, Beverly Hills, CA 90210
  - d. Department: 207
  - e. Case type:  limited civil  unlimited civil  probate  family law  other (specify):
  - f. Filing date: December 30, 2022
  - 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: Olivia Hussey and Leonard Whiting DEFENDANT/RESPONDENT: Paramount Pictures Corp., et al.	CASE NUMBER: 24STCV03814
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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: March 22, 2024

Richard B. Kendall  
(TYPE OR PRINT NAME OF PARTY OR ATTORNEY)

  
(SIGNATURE OF PARTY OR ATTORNEY)

**Attachment 1h –**  
**Additional Explanation Of Relationship Between The Two Cases**

The two successive cases—(i) *Olivia Hussey and Leonard Whiting v. Paramount Pictures Corporation* (LASC 22SMC02968), which was decided in 2023 by Judge Alison Mackenzie; and (ii) *Olivia Hussey and Leonard Whiting v. Paramount Pictures Corporation, et al.* (LASC 28STCV0814), now pending before Judge Holly Fujie—are related within the meaning of California Rules of Court, Rule 3.300, including because:

1. the two cases involve the same parties (*i.e.*, the two lead actors of the 1968 film *Romeo & Juliet* and Paramount Pictures Corporation);
2. the two cases allege the same historical facts (including the actors’ alleged experiences filming *Romeo & Juliet*);
3. the two cases allege the same or similar causes of action (including a claim for misappropriation of name and likeness);
4. the two cases are premised on the same alleged misconduct (*e.g.*, the alleged fraudulent inducement of the actors to appear semi-undressed in the film’s bedroom scene);
5. the two cases involve the same documentary evidence and party and nonparty witnesses (including the same underlying contracts for each of the two actors, which memorialize their consent to the conduct at issue in both cases);
6. the two cases are barred by the same defenses (including timing defenses, the First Amendment, express and implied consent, and preemption);
7. the two cases require the application of the same legal principles; and
8. the two cases are likely to be disposed at the same procedural posture by the same type of motion: a motion to strike the complaint pursuant to California’s anti-SLAPP statute.

On this last point, Paramount Pictures Corporation (“PPC”) successfully moved to strike the complaint in the earlier case, *Olivia Hussey and Leonard Whiting v. Paramount Pictures Corporation* (LASC 22SMC02968), pursuant to the anti-SLAPP statute. In connection with that anti-SLAPP motion, PPC submitted extensive documentary and testimonial evidence, and advanced detailed arguments about the timeliness and merits of the claims. Judge Alison Mackenzie heard lengthy oral arguments at the May 25, 2023 hearing before granting PPC’s anti-SLAPP motion in its entirety. Judge Mackenzie subsequently granted PPC’s motion for attorneys’ fees under the anti-SLAPP statute as well, and a final judgment was entered on July 6, 2023.

The second case filed by Ms. Hussey and Mr. Whiting, less than one year after the dismissal of their first action, is a retread of the first action. As before, PPC plans to file an anti-SLAPP motion to strike the complaint in the second case and will do so by the statutory deadline of May 24, 2024. PPC’s forthcoming anti-SLAPP motion will, as before, address (i) the public issue or matters of public interest at issue; and (ii) the likelihood of success of the claims. The public interest analysis will be substantially the same as the analysis done for PPC’s first successful anti-SLAPP motion. In addition, certain of the timeliness and substantive arguments concerning the merits of the claims will be repeated and/or adapted in PPC’s second anti-SLAPP motion. Accordingly, absent the formal relation of these two cases, the disposition of the second case is “likely ... to require substantial duplication of judicial resources if heard by different judges.” CRC, Rule 3.300(a)(4).

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**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*):  
Kendall Brill & Kelly LLP  
10100 Santa Monica Boulevard, Suite 1725  
Los Angeles, CA 90067
  
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*): March 22, 2024
  - b. from (*city and state*): Los Angeles, CA 90067
  
4. The envelope was addressed and mailed as follows:
 

<ol style="list-style-type: none"> <li>a. Name of person served: Solomon E. Gresen; Sarah A.Scott / RG Lawyers, LLP Street address: 16200 Ventura Blvd., Suite 216 City: Encino State and zip code: CA 91436</li> <li>b. Name of person served: Jason M. Ingber / Law Offices of Jason M. Ingber Street address: 3280 Wilshire Blvd., Suite 1260 City: Los Angeles State and zip code: CA 90010</li> </ol>	<ol style="list-style-type: none"> <li>c. Name of person served: Arnold P. Peter; Eyal Farahan / Peter Law Group Street address: 270 Coral Circle City: El Segundo State and zip code: CA 90245</li> <li>d. Name of person served: William A. Romaine / Romaine Lokhandwala Law Group Street address: 3323 South Fairway Street, Suite 5 City: Visalia State and zip code: CA 93277</li> </ol>
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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: March 22, 2024

Katie Yamashita

(TYPE OR PRINT NAME OF DECLARANT)



(SIGNATURE OF DECLARANT)