

Dept. # 56 Assigned Fuyp
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BAKER, OLSON, LeCROY & DANIELIAN

FILED
Superior Court of California
County of Los Angeles

JUL 06 2018

Sherri R. Carter, Executive Officer/Clerk
By [Signature] Deputy
Spaymya Bolden

Attorney for Plaintiff,
Gregg "Rocky" Brooks

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

BC 713123

GREGG "ROCKY" BROOKS

Case No:

Plaintiff,

Complaint for Damages:

v.

- 1) Assault and Battery
- 2) Intentional Infliction of Emotional Distress
- 3) Negligence
- 4) Negligence-Respondeat Superior
- 5) Negligent Hiring and Retention of Unfit Employee
- 6) Negligent Supervision of Employee
- 7) Hostile Work Environment
- 8) Wrongful Termination in Violation of Public Policy
- 9) Retaliation
- 10) Negligent Infliction of Emotional Distress

JOHN C. DEPP, an individual; MIRIAM SEGAL, an individual; BRAD FURMAN, an individual; GOOD FILM PRODUCTIONS US, INC., a New York Corporation; INFINITUM NIHIL, A Californian Corporation; And DOES 1-50

Plaintiff, Gregg "Rocky" Brooks brings this complaint against Defendants, John C. Depp, Miriam Segal, Brad Furman, Good Film Productions US, Inc., Infinitum Nihil, and DOES 1-50, inclusive, based upon the following allegations:

VENUE

1. This court has jurisdiction over this action and Defendants pursuant to California Code of Civil Procedure § 410.10. This is a civil action wherein the matter in controversy exclusive of interest and costs, exceeds the jurisdictional minimum of the Court.

RECEIPT #: CCH465980100
DATE PAID: 07/06/18 12:41 PM
PAYMENT: \$435.00
RECEIVED:
CHECK: \$435.00
CASH: \$0.00
CHANGE: \$0.00
CARD: \$0.00

CIT/CASE: BC713123
LEA/DEF#:

1 Defendants, during times relevant to this action, have conducted substantial, systematic
2 and continuous commercial activities in California.

3 2. Venue is proper in this judicial district pursuant to California Code of Civil Procedure
4 §§ 395 (a) and 395.5 as at least some of the acts and omissions complained of in this
5 action occurred in the County of Los Angeles in the State of California. Each of the
6 Defendants either owns property, maintains an office, transacts business, engages in
7 financial operations, has an agent or agents within the County of Los Angeles, and/or is
8 otherwise found within the County of Los Angeles, and each of the Defendants is within
9 the jurisdiction of this Court for purposes of service of process.

10 PARTIES

11 3. Gregg "Rocky" Brooks ("PLAINTIFF") is an individual and is now and, at all times
12 mentioned in this complaint, was residing in the County of Los Angeles, State of California.

13 4. John C. Depp ("DEPP") is an individual and is now and, at all times mentioned in
14 this complaint, was residing in the County of Los Angeles, State of California.

15 5. Miriam Segal ("SEGAL") is an individual and is now and, at all times mentioned in
16 this complaint, a producer of the feature film "Labyrinth" (retitle "City of Lies") (herein referred to
17 as "LABYRINTH" or the "PRODUCTION"), doing substantial business in the state of
18 California, including filming the movie the LABYRINTH on location in Los Angeles County.

19 6. Brad Furman ("FURMAN") is an individual and is now and, at all times mentioned in
20 this complaint, was the director of the LABYRINTH, doing substantial business in the state
21 of California, including filming the LABYRINTH on location in Los Angeles County.

22 7. Good Film Productions US, Inc. ("GOOD FILMS") is a New York Corporation which
23 is also registered to do business in and is doing business in the State of California, County
24 of Los Angeles with offices at 150 S. Rodeo Drive, Third Floor, Beverly Hills, CA 90212.

25 8. Infinitum Nihil ("INFINITUM") is now and, at all times mentioned in this complaint,
26 was a California Corporation doing business in the State of California with offices at 21700
27 Oxnard Street, Suite #400, Woodland Hills, CA 91367.

28 9. PLAINTIFF is ignorant of the true names and capacities of Defendants sued herein
as DOES I through 50, inclusive, and therefore sues these Defendants by such fictitious

1 names. PLAINTIFF will amend this complaint to allege their true names and capacities
2 when ascertained.

3 10. At all times herein mentioned, each Defendant, including the fictitiously named DOE
4 Defendants, were the partners, servants, agents, joint venturers, or employees of each of
5 the remaining Defendants and were acting within the course and scope of their position,
6 service, agency, venture, or employment. PLAINTIFF is informed and believes and
7 thereon alleges that each Defendant ratified, approved, and adopted the conduct of the
8 other Defendants.

9 11. PLAINTIFF is informed and believes and thereon alleges that each of the
10 aforementioned Defendants either acted or caused action to occur which caused damages
11 to PLAINTIFF.

12 **GENERAL ALLEGATIONS**

13 12. In 2017, PLAINTIFF was retained as the Location Manager for the feature film
14 LABYRINTH by GOOD FILMS.

15 13. At all times relevant herein, SEGAL was one of the producers of LABYRINTH and
16 the founding manager of GOOD FILMS.

17 14. At all times relevant herein, GOOD FILMS was one of the production companies
18 responsible for the production of LABYRINTH.

19 15. At all times relevant herein, FURMAN was the director of LABYRINTH.

20 16. At all times relevant herein, DEPP was one of the "stars" of the LABYRINTH and a
21 director for the production company INFINITUM.

22 17. At all times relevant herein, INFINITUM was one of the production companies
23 responsible for the production of LABYRINTH.

24 18. On or about April 13, 2017, LABYRINTH was filming in Downtown Los Angeles,
25 inside and around the Barclay Hotel ("BARCLAY").
26
27
28

1 19. Filming permits were obtained from Film LA & Contract Services ("FILM LA")
2 allowing filming from 7:00 a.m. to 10:00 p.m. The permits provided that filming outside the
3 BARCLAY was to end at 7:00 p.m. and filming inside the BARCLAY was to end at 10:00
4 p.m. As Location Manager, it was PLAINTIFF's responsibility to make sure the
5 PRODUCTION was complying with the permit requirements and to liaise with FILM LA if
6 any issues arose.

7 20. SEGAL approached PLAINTIFF and requested he try and extend the hours of the
8 permit in order to accommodate the needs of production and to accommodate DEPP, who
9 wanted to direct two friends in an expanded version of the scene previously scheduled for
10 the day.
11

12 21. PLAINTIFF and SEGAL then approached the FILM LA site monitor, Jason Gonet
13 ("GONET"), to discuss the needs of production and the parameters of the permit
14 extension. After reviewing all of SEGAL's needs for production, the FILM LA permit office
15 was contacted and the first permit extension of the night was granted.
16

17 22. As filming continued, it became apparent that additional time was needed and
18 SEGAL again requested PLAINTIFF obtain a permit extension.

19 23. PLAINTIFF and GONET again contacted the FILM LA permit office and were
20 granted a final extension for filming. The new filming permits were set to expire at 11:00
21 p.m. outside the BARCLAY and at 12:00 a.m. inside the BARCLAY.
22

23 24. At approximately 10:50 p.m., GONET asked PLAINTIFF to inform the 1st AD, Paul
24 Silver, that time was running out and that the current "shot" would have to be the last
25 exterior "shot" of the night.

26 25. While PLAINTIFF was relaying the information regarding the last shot to the 1st AD,
27 FURMAN interjected, instructing PLAINTIFF, "why don't you tell that to Johnny Depp!"
28 FURMAN did this knowing that DEPP would not be happy about the restriction.

1 26. DEPP was not the director on LABYRINTH and therefore there was no reason for
2 PLAINTIFF to directly notify DEPP of filming restrictions. Furthermore, based on custom
3 and practice on movie productions, FURMAN should never have instructed PLAINTIFF to
4 speak with or give instruction to DEPP regarding production matters.

5 27. PLAINTIFF, feeling he had no choice but to do as he was instructed, agreed to relay
6 the message to DEPP. However, knowing DEPP may become upset and feeling the need
7 to protect himself, PLAINTIFF started approaching the nearby, on-set LAPD officer Jim
8 "Big" Rigg to get his assistance in relaying the message to DEPP.

9 28. Before PLAINTIFF could reach the LAPD Officer, DEPP accosted PLAINTIFF and
10 began attacking him, angrily screaming in his face "WHO THE FUCK ARE YOU? YOU
11 HAVE NO RIGHT TO TELL ME WHAT TO DO!"

12 29. PLAINTIFF remained calm and professional, explained who he was and that, as
13 Location Manager, it was his responsibility to make sure the PRODUCTION complied with
14 the permit requirements.

15 30. The altercation continued with DEPP screaming "I DON'T GIVE A FUCK WHO YOU
16 ARE AND YOU CAN'T TELL ME WHAT TO DO!"

17 31. At the same time, while screaming at PLAINTIFF, DEPP angrily and forcefully
18 punched PLAINTIFF twice in the lower left side of his rib cage and causing pain.

19 32. Despite having just been punched in the side, PLAINTIFF maintained his
20 composure. When PLAINTIFF did not react to DEPP's satisfaction after being punched,
21 DEPP yelled "I WILL GIVE YOU ONE HUNDRED THOUSAND DOLLARS TO PUNCH ME
22 IN THE FACE RIGHT NOW!" PLAINTIFF still did not react and DEPP continued to scream
23 and berate him in front of a set full of people until DEPP's own bodyguards physically
24 removed DEPP from the scene.
25
26
27
28

1 33. Throughout the altercation, PLAINTIFF noticed that DEPP's breath reeked of
2 alcohol.

3 34. PLAINTIFF is informed, believes and thereon alleges that DEPP had been drinking
4 alcohol and using drugs throughout the day on set.

5 35. On the Monday following the incident, April 16, 2017, PLAINTIFF returned to the
6 production office to work on wrapping out the show. Upon arrival, PLAINTIFF was
7 informed that SEGAL wanted him to write and sign a declaration stating that he would not
8 sue the PRODUCTION. When PLAINTIFF declined to write such a statement, his services
9 were terminated immediately.
10

11 **FIRST CAUSE OF ACTION**
12 **Assault and Battery**
13 **(Against DEFENDANT Depp and DOES 1-50)**

14 36. PLAINTIFF incorporates Paragraphs 1 through 35 herein the same as though fully
15 set out in this Cause of Action at length.

16 37. On or about April 13, 2017, as detailed above, DEPP accosted PLAINTIFF, got in
17 his face, and proceeded to scream and berate PLAINTIFF placing PLAINTIFF in fear of a
18 harmful or offensive contact.

19 38. In doing the above-alleged acts, DEPP intended to threaten PLAINTIFF and put
20 him in apprehension of harmful contact with his person.

21 39. As a result of DEPP's acts, PLAINTIFF was, in fact, placed in great apprehension of
22 harmful contact with his person.

23 40. While screaming and threatening PLAINTIFF, DEPP maliciously and forcefully
24 punched PLAINTIFF twice in the lower left side of his rib cage.

25 41. In doing the acts alleged herein, DEPP acted with the intent of making harmful
26 contact with PLAINTIFF's person.
27

28 42. At no time did PLAINTIFF consent to any of the acts of DEPP alleged herein.

1 43. As a proximate result of DEPP's acts, PLAINTIFF suffered physical pain and
2 emotional and psychological injury, all of which have caused and continue to cause
3 PLAINTIFF psychological and emotional distress. As a result of these injuries, PLAINTIFF
4 has suffered general damages.

5 44. DEPP's aforementioned conduct was willful and malicious and was intended to
6 oppress and cause injury to PLAINTIFF. PLAINTIFF is therefore entitled to an award of
7 punitive damages.
8

9 **SECOND CAUSE OF ACTION**
10 **Intentional Infliction of Emotional Distress**
11 **(Against DEFENDANT Depp and DOES 1-50)**

12 45. PLAINTIFF incorporates Paragraphs 1 through 44 herein the same as though fully
13 set out in this Cause of Action at length.

14 46. DEPP verbally and physically attacked PLAINTIFF in front of the cast and crew of
15 the PRODUCTION, berating and demeaning PLAINTIFF for doing what FURMAN
16 requested he do.

17 47. DEPP's conduct was intentional and malicious and done for the purpose of causing
18 PLAINTIFF to suffer humiliation, mental anguish, and emotional and physical distress

19 48. As a proximate result of DEPP's yelling, demeaning, and punching PLAINTIFF,
20 PLAINTIFF suffered pain, severe humiliation, mental anguish, and emotional and physical
21 distress, and has been injured in mind and body.

22 **THIRD CAUSE OF ACTION**
23 **Negligence**
24 **(Against DEFENDANT Depp and DOES 1-50)**

25 49. PLAINTIFF incorporates Paragraphs 1 through 48 herein the same as though fully
26 set out in this Cause of Action at length.

27 50. On or about April 13, 2017, DEPP negligently, carelessly and recklessly harmed
28 PLAINTIFF in such a manner that he placed PLAINTIFF in apprehension of harmful
contact and caused his fist to make harmful violent contact with PLAINTIFF's body.

1 51. As a direct and proximate result of the negligent, careless, reckless and unlawful
2 conduct of DEPP, PLAINTIFF suffered pain, severe humiliation, mental anguish, and
3 emotional and physical distress, and has been injured in mind and body
4

5 **FOURTH CAUSE OF ACTION**
6 **Negligent - Respondeat Superior**
7 **(Against All Defendants)**

8 52. PLAINTIFF incorporates Paragraphs 1 through 51 herein the same as though fully
9 set out in this Cause of Action at length.

10 53. At all times herein mentioned, DEPP was an agent and employee of GOOD FILMS,
11 INFINITUM, SEGAL, and FURMAN, and, in doing the acts herein described and referred
12 to, was acting in the course and within the scope of his authority as agent and employee,
13 and in the transaction of the business of the employment or agency. GOOD FILMS,
14 INFINITUM, SEGAL, and FURMAN are therefore liable to plaintiff for the acts of DEPP as
15 heretofore alleged.

16 **FIFTH CAUSE OF ACTION**
17 **Negligent Hiring and Retention of Unfit Employee**
18 **(Against All Defendants)**

19 54. PLAINTIFF incorporates Paragraphs 1 through 53 herein the same as though fully
20 set out in this Cause of Action at length.

21 55. PLAINTIFF is informed and believes and thereon alleges that in doing the acts as
22 here alleged, GOOD FILMS, INFINITUM, SEGAL, and FURMAN knew or, in the exercise
23 of reasonable diligence, should have known that DEPP was incompetent and unfit and that
24 an undue risk to persons such as PLAINTIFF would exist because of the employment.

25 56. PLAINTIFF is informed and believes and thereon alleges that DEPP was under the
26 influence of drugs and/ or alcohol while working on set.

27 57. PLAINTIFF is informed and believes and thereon alleges that at all times mentioned
28 herein, GOOD FILMS, INFINITUM, SEGAL, and FURMAN knew or, in the exercise of

1 reasonable diligence, should have known that DEPP was under the influence of drugs and
2 /or alcohol.

3 58. PLAINTIFF is further informed and believes and thereon alleges that DEPP has a
4 volatile temper and becomes easily agitated and hostile towards others.

5 59. PLAINTIFF is informed and believes and thereon alleges that GOOD FILMS,
6 SEGAL, INFINITUM, and FURMAN knew or, in the exercise of reasonable diligence,
7 should have known that DEPP has a volatile temper and becomes easily agitated and
8 hostile towards others.
9

10 60. PLAINTIFF is informed and believes and thereon alleges that GOOD FILMS,
11 INFINITUM, SEGAL, and FURMAN knew or, in the exercise of reasonable diligence,
12 should have known that, due to his temper and his use of drugs and or alcohol, DEPP
13 posed a potential danger to other employees on set, including PLAINTIFF.

14 61. Despite the advance knowledge, GOOD FILMS, INFINITUM, SEGAL, and
15 FURMAN retained DEPP as an employee in conscious disregard for the rights and safety
16 of others. As a result of this conscious disregard for the rights of PLAINTIFF, PLAINTIFF is
17 entitled to an award of punitive damages from GOOD FILMS, INFINITUM, SEGAL, and
18 FURMAN.
19

20 **SIXTH CAUSE OF ACTION**
21 **Negligent Supervision of Employee**
22 **(Against All Defendants)**

23 62. PLAINTIFF incorporates Paragraphs 1 through 61 herein the same as though fully
24 set out in this Cause of Action at length.

25 63. Notwithstanding the knowledge that DEPP was incompetent and unfit and that
26 DEPP posed a potential danger to other employees on set due to his intoxication, GOOD
27 FILMS, INFINITUM, SEGAL, and FURMAN failed to adequately supervise DEPP.
28

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1 64. The failure of GOOD FILMS, INFINITUM, SEGAL, and FURMAN to adequately
2 supervise DEPP was the proximate cause of PLAINTIFF's injury. Had GOOD FILMS,
3 INFINITUM, SEGAL, and FURMAN properly supervised DEPP, he would not have been
4 intoxicated on set and he would not have attacked PLAINTIFF.

5 65. Despite advance knowledge, GOOD FILMS, INFINITUM, SEGAL, and FURMAN
6 allowed DEPP to remain on set in conscious disregard for the rights and safety of others.
7 As a result of this conscious disregard for the rights of PLAINTIFF, PLAINTIFF is entitled
8 to an award of punitive damages from GOOD FILMS, INFINITUM, SEGAL, and FURMAN.
9

10 **SEVENTH CAUSE OF ACTION**
11 **Hostile Work Environment**
12 **(Against All Defendants)**

13 66. PLAINTIFF incorporates Paragraphs 1 through 65 herein the same as though fully
14 set out in this Cause of Action at length.

15 67. PLAINTIFF is informed and believes and thereon alleges that DEPP's intoxication
16 and temper created a hostile, abusive and unsafe work environment which eventually
17 resulted in PLAINTIFF being assaulted by DEPP during filming.

18 68. PLAINTIFF is informed and believes and thereon alleges that FURMAN's conduct
19 on set, including, but not limited to, negligently delegating his duty to direct the
20 PRODUCTION to DEPP and negligently instructing PLAINTIFF to act outside the scope of
21 his responsibilities and directly inform DEPP that filming needed to cease created and or
22 contributed to the creation on a hostile, abusive, and unsafe work environment which
23 eventually resulted in PLAINTIFF being assaulted by DEPP during filming.

24 69. PLAINTIFF is informed and believes and thereon alleges that GOOD FILMS,
25 INFINITUM, SEGAL, and FURMAN knew or, in the exercise of reasonable diligence,
26 should have known that DEPP's behavior was creating a hostile, unsafe work
27 environment.
28

07/06/2018

1 70. PLAINTIFF is informed and believes and thereon alleges that GOOD FILMS,
2 INFINITUM, SEGAL, and FURMAN knew or, in the exercise of reasonable diligence,
3 should have known that FURMAN's behavior was creating a hostile, unsafe work
4 environment.

5 71. PLAINTIFF is informed and believes and thereon alleges that despite being aware
6 that DEPP's ongoing problems on set were creating a hostile, unsafe work environment,
7 GOOD FILMS, INFINITUM, SEGAL, and FURMAN did nothing to remedy the situation.
8

9 72. PLAINTIFF is informed and believes and thereon alleges that not only did GOOD
10 FILMS, INFINITUM, SEGAL, and FURMAN not attempt to remedy the situation, but
11 FURMAN further exasperated the situation when he instructed PLAINTIFF to personally
12 approach DEPP and inform him that filming needed to stop.

13 73. PLAINTIFF is informed and believes and thereon alleges that despite being aware
14 that FURMAN's behavior on set was creating a hostile, unsafe work environment, GOOD
15 FILMS, INFINITUM, SEGAL, and FURMAN did nothing to remedy the situation.
16

17 74. The conduct of GOOD FILMS, INFINITUM, SEGAL, and FURMAN and DEPP was
18 a substantial factor in PLAINTIFF being assaulted and battered on set.

19 **EIGHTH CAUSE OF ACTION**
20 **Wrongful Termination in Violation of Public Policy**
21 **(Against Defendants Good Films, Infinitum, and Segal)**

22 75. PLAINTIFF incorporates Paragraphs 1 through 74 herein the same as though fully
23 set out in this Cause of Action at length.

24 76. On or about April 16, 2017, after the assault and battery incident mentioned herein,
25 GOOD FILMS, INFINITUM, and SEGAL, or an agent thereof, demanded PLAINTIFF
26 execute a declaration stating that he would not sue the PRODUCTION, its employees or
27 agents for the assault and battery incident which occurred on April 13, 2017.
28

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1 77. GOOD FILMS', INFINITUM's, and SEGAL's demand goes against public policy as it
2 deprives individuals, such as PLAINTIFF, of an important legal right. PLAINTIFF had a
3 legal right to seek redress for injuries arising out of a workplace assault and battery
4 through a civil action.

5 78. When PLAINTIFF refused to execute any such declaration, GOOD FILMS,
6 INFINITUM, and SEGAL retaliated by terminating PLAINTIFF on the spot.

7 79. As a result of GOOD FILMS, INFINITUM, and SEGAL conduct, PLAINTIFF suffered
8 harm, including lost earnings and other employment benefits, humiliation and
9 embarrassment and mental anguish.
10

11 80. In doing the acts set forth herein, GOOD FILMS, INFINITUM, and SEGAL knew the
12 conduct required of PLAINTIFF was unlawful and violated PLAINTIFF's rights. Despite
13 this knowledge, GOOD FILMS, INFINITUM, and SEGAL subjected PLAINTIFF to unjust
14 hardship in conscious disregard for PLAINTIFF's rights by demanding he waive his right to
15 redress under civil law or lose his job. GOOD FILMS, INFINITUM, and SEGAL conduct, by
16 and through their agents, warrants the assessment of punitive damages.
17

18 **NINTH CAUSE OF ACTION**

19 **Retaliation**

20 **(Against Defendants Good Films, Infinitum, and Segal)**

21 81. PLAINTIFF incorporates Paragraphs 1 through 80 herein the same as though fully
22 set out in this Cause of Action at length.

23 82. The discharge of an employee in retaliation for resisting employer's unlawful
24 demands made in violation of laws that secure important public policies disregards those
25 policies, and gives rise to a common law action in tort.

26 83. PLAINTIFF was terminated for refusing to waive his legal rights after being
27 assaulted and battered on set by another employee/agent under Defendants' control.
28

1 GOOD FILMS, INFINITUM, and SEGAL violation of PLAINTIFF's legal rights is
2 inconsistent and hostile to the public's interest.

3 84. As a result of GOOD FILMS, INFINITUM, and SEGAL conduct, PLAINTIFF suffered
4 harm, including lost earnings and other employment benefits, humiliation and
5 embarrassment and mental anguish.

6 85. GOOD FILMS, INFINITUM, and SEGAL committed the acts alleged herein
7 oppressively and maliciously, with the wrongful intention of injuring PLAINTIFF, with
8 improper motive amounting to malice, and in conscious disregard of PLAINTIFF's rights, in
9 that GOOD FILMS, INFINITUM, and SEGAL demanded PLAINTIFF waive his legal right or
10 lose his job. Thus, PLAINTIFF is entitled to recover punitive damages from Defendants.
11

12 **TENTH CAUSE OF ACTION**
13 **Negligent Infliction of Emotional Distress**
14 **(Against All Defendants)**

15 86. PLAINTIFF incorporates Paragraphs 1 through 85 herein the same as though fully
16 set out in this Cause of Action at length.

17 87. PLAINTIFF is informed and believes and thereon alleges GOOD FILMS,
18 INFINITUM, SEGAL, and FURMAN knew or, should have known, that their failure to
19 exercise due care in hiring DEPP, supervising DEPP and maintaining a safe work
20 environment would place employees, such as PLAINTIFF, in danger.

21 88. GOOD FILMS, INFINITUM, SEGAL, and FURMAN failure to control DEPP's
22 conduct while on set, as herein alleged, proximately caused PLAINTIFF to suffer pain,
23 humiliation, severe emotional distress, and mental suffering.

24 89. Furthermore, GOOD FILMS', INFINITUM's, and SEGAL's wrongful termination of
25 PLAINTIFF caused PLAINTIFF to suffer humiliation severe emotional distress and mental
26 suffering.
27
28

1 90. PLAINTIFF is informed and believes and thereon alleges that GOOD FILMS,
2 INFINITUM, SEGAL, and FURMAN negligent conduct, as alleged here, was the proximate
3 cause of his severe emotional distress, humiliation, and mental suffering.

4 **PRAYER FOR RELIEF**

5 **Wherefore**, Gregg "Rocky" Brooks, prays for judgment against John C. Depp, Miriam
6 Segal, Brad Furman, and Good Film Productions, Inc., Infinitum Nihil and each of them as
7 follows:

- 8 1. For General damages to be proven at trial;
9 2. For Punitive damages to be proven at trial;
10 3. For cost of suit herein incurred;
11 4. For such other and further relief as this Court may deem just and proper.
12

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15 Dated: 7/5/18

BAKER, OLSON, LeCROY & DANIELIAN

16
17 By 

18 Arbella Azizian,
19 Attorneys for Plaintiff
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