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FILED
Superior Court of California
County of Los Angeles

JUL 27 2015

Sherri K. Carter, Executive Officer/Clerk
By M. Soto, Deputy
Moses Soto

6 Attorneys for Plaintiff JAMES SAFECHUCK

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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**
10

11 JAMES SAFECHUCK, an individual,

12 Plaintiff,

13 vs.

14 DOE 1, an individual; DOE 2,
15 ; DOE 3,
and DOES 4-50, inclusive,

16 Defendants.
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Case No.: BC545264

[Related to civil case, BC508502, Wade Robson
v. MJJ Productions, et al., and probate case
BP117321, In re Estate of Michael Joseph
Jackson]

[Both cases assigned to the Honorable Judge
Mitchell L. Beckloff, Dept. 51]

**DECLARATION AND CERTIFICATE OF
MERIT OF MARYANN R. MARZANO IN
SUPPORT OF COMPLAINT AGAINST
DOE 1**

(California Code of Civil Procedure § 340.1)

Complaint filed: May 1, 2014
Trial date: None set

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24 **REDACTED COPY FILED PURSUANT TO COURT ORDER**

25 **ENTERED JULY 24, 2014**
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ORIGINAL
5-10-2014-4-20

1 **DECLARATION OF MARYANN R. MARZANO**

2 I, MARYANN R. MARZANO, declare as follows:

3 1. I am an attorney at law duly licensed to practice in the State of California and am a
4 partner in the law firm of Gradstein & Marzano, P.C., counsel of record for Plaintiff James
5 Safechuck ("Plaintiff") in the above-captioned matter. I submit this Declaration and Certificate of
6 Merit in support of Plaintiff's Complaint against Doe 1 in accordance with California Code of
7 Civil Procedure ("CCP") §§ 340.1(h) and (i). I have personal knowledge of the facts stated herein
8 except as otherwise indicated by the context and as to those matters, I believe them to be true.

9 2. I have been working on this matter for approximately eight months and have
10 reviewed the facts of the case extensively. I have interviewed and communicated with the
11 Plaintiff on numerous occasions regarding the childhood sexual abuse which he suffered at the
12 hands of Doe 1 and find him to be completely credible. In addition, Plaintiff has signed a detailed
13 Declaration under penalty of perjury setting forth the nature and history of his relationship with
14 Doe 1, and the intimate and many details of childhood sexual abuse he suffered over a 4 year
15 period from ages 10 to 14.

16 3. I have also worked extensively with Dr. , who is an expert in Child
17 Sexual Abuse. She has been licensed as a psychologist in the State of California since March
18 1989 and has conducted over 3,000 psychological evaluations of children, adolescents and adults
19 since she has been in practice. Her curriculum vitae is extensive, and a copy is attached to the
20 Declaration and Certificate of Merit she has submitted in this case. It highlights her education,
21 honors and professional experience including clinical, teaching and research work as a
22 psychologist. As required by CCP § 340.1, she is neither a party to the action nor Plaintiff's
23 treating physician. I know that Dr. is knowledgeable of the relevant facts and issues in
24 this action. She has thoroughly researched the matter, and has extensively interviewed and tested
25 Plaintiff, which she describes at length in her Declaration and Certificate of Merit.

26 4. As she has stated in her Declaration and Certificate of Merit, Dr.
27 performed a psychological evaluation of Plaintiff that consisted of four interviews totaling 13
28 hours 30 minutes in addition to extensive psychological testing. Psychological testing was

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8. It is Dr. further clinical opinion that

9. Dr. has further diagnosed Plaintiff as

10. To the best of my knowledge, I have also reviewed all of the publicly available

07/30/2015

1 materials from a civil action brought by another boy against Doe 1 in 1993 named Jordy
2 Chandler, including his complaint, declaration of sexual abuse and an interview he had with a
3 psychiatrist in which he describes and (fictionally) names other boys who were sexually abused;
4 the materials and numerous transcripts from the 2005 criminal trial in Santa Barbara County
5 against Doe 1 for childhood sexual abuse; and the materials concerning the claim for childhood
6 sexual abuse brought by Claimant/Creditor Wade Robson against Doe 1 which is presently
7 pending before this Court. I have also reviewed materials which include photographs, call sheets
8 and other documents and records reflecting that Doe 1 used his corporate entities to facilitate the
9 wrongful conduct alleged in the Complaint.

10 11. I have concluded beyond a shadow of any doubt, based upon the foregoing
11 consultations and review of the available evidence and information, that there is a reasonable and
12 meritorious basis for the filing of the action.

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

15 Executed this 5th day of May, 2014, at Los Angeles, California.

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20 Maryann R. Marzano
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PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 6310 San Vicente Boulevard, Suite 510, Los Angeles, California 90048-5418.

On July 27, 2015 I served the document described as

DECLARATION AND CERTIFICATE OF MERIT OF MARYANN R. MARZANO IN SUPPORT OF COMPLAINT AGAINST DOE 1
[Redacted copy]

on the interested parties to this action by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

Howard Weitzman
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Counsel for the Executors of the Estate of
Michael Joseph Jackson

Counsel for the Executors of the Estate of
Michael Joseph Jackson

BY MAIL: I am readily familiar with the firm's practice for the collection and processing of correspondence, pleadings and notices for mailing. Under that practice it is deposited with the United States Postal Service that same day in the ordinary course of business with postage thereon fully prepaid at Los Angeles, California.

BY ELECTRONIC MAIL: A true and correct copy of the document was also served by electronic mail as indicated above and no error was reported.

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

Executed July 27, 2015 at Los Angeles, California.


Sidney Summers

07/30/15 09:45