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

11
12 VERA SEROVA, an individual, on behalf of
herself and all others similarly situated,

13 Plaintiff,

14 vs.

15 SONY MUSIC ENTERTAINMENT, a
Delaware general partnership; JOHN
16 BRANCA, as Co-Executor of the Estate of
Michael J. Jackson; EDWARD JOSEPH
17 CASCIO, an individual; JAMES VICTOR
PORTE, an individual; MJJ PRODUCTIONS,
18 INC., a California Corporation;
ANGELIKSON PRODUCTIONS LLC, a
19 New York Jersey Limited Liability Company;
and DOES 1 through 50, inclusive,
20

21 Defendants.
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23

Case No. BC 548468

JOINT STATUS CONFERENCE REPORT

Case Assigned for All Purposes to
Judge Jane L. Johnson

Department: 308
Date: November 25, 2015
Time: 10:00 a.m.

24 The parties submit this Joint Status Conference Report in advance of the Further Status
25 Conference scheduled for November 25, 2015, at 10:00 a.m.

26 This matter has been stayed since its inception. On April 16, 2015, the parties mediated
27 with the Honorable John Leo Wagner (Ret.) of Judicate West. The parties did not reach a
28

1 settlement that day but agreed to continue mediating. This Further Status Conference was
2 previously set for June 23, 2015, but the Court has continued it four times (to August 20, 2015,
3 September 24, 2015, October 22, 2015 and November 25, 2015) to give the parties time to
4 conclude their settlement discussions.

5 Since the last continuance, the parties' settlement discussions have reached an impasse.
6 Accordingly, the parties are prepared to set a case management schedule at the upcoming Further
7 Status Conference.

8 Defendants intend to file a Special Motion to Strike under California's anti-SLAPP statute
9 along with a demurrer to all causes of action.

10 To oppose, pursuant to Code Civ. Proc. § 425.16, subd. (g), Plaintiff intends to seek this
11 Court's permission to conduct discovery, including taking depositions and propounding requests
12 for production of documents regarding, *inter alia*:

- 13 1) The history of the disputed tracks—"Breaking News," "Monster," and "Keep
14 Your Head Up"—including without limitation their writing, development,
15 creation, production, editing, mixing, engineering, exploitation, ownership,
16 copyright, transfer, licensing, publishing, release, distribution, marketing, sales,
17 and profits, and each Defendant's role in that history.
- 18 2) Each Defendants' knowledge of whether Jackson performed the lead vocals on
19 "Breaking News," "Monster," and/or "Keep Your Head Up," including the
20 history of each Defendant's investigation into the disputed tracks' authenticity.
- 21 3) Whether Michael Jackson performed the lead vocals on "Breaking News,"
22 "Monster," and "Keep Your Head Up."
- 23 4) Jason Malachi's role in the creation of "Breaking News," "Monster," and "Keep
24 Your Head Up."
- 25 5) Each Defendants' representations and/or non-disclosures regarding whether
26 Michael Jackson performed the lead vocals on "Breaking News," "Monster,"
27 and "Keep Your Head Up."

28 Plaintiff estimates that she will need at least 90 days to complete discovery to oppose

1 Defendants' anti-SLAPP motion, however, additional time may be necessary if disputes arise.

2 The Estate, Sony, and MJJ Productions will oppose Plaintiff's request for discovery.
3 Discovery is stayed upon the filing of an Anti-SLAPP motion, and it is only permitted upon a
4 showing of "good cause," which Plaintiff will not be able to show. And even if permitted,
5 discovery is limited to what is necessary to oppose the motion, and certainly will be more limited
6 than the discovery Plaintiff is proposing.

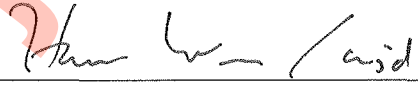
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8 DATED: November 18, 2015

GALLO LLP

9
10 By: 
11 Dominic Valerian
12 Attorneys for Plaintiff


13 DATED: November 18, 2015

KINSELLA WEITZMAN ISER KUMP
& ALDISERT LLP

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15 By: 
16 Howard Weitzman
17 Attorneys for Defendants John Branca, as Co-
18 Executor of the Estate of Michael J. Jackson, Sony
19 Music Entertainment and MJJ Productions, Inc.

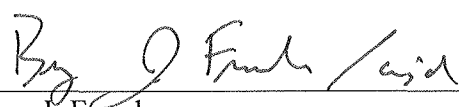
20 DATED: November 18, 2015

KATTEN MUCHIN ROSENMAN LLP

21
22 By: 
23 Andrew J. Demko
24 Attorneys for Defendants John Branca, as Co-
25 Executor of the Estate of Michael J. Jackson, Sony
26 Music Entertainment and MJJ Productions, Inc.

27 DATED: November 18, 2015

FREEDMAN AND TAITELMAN, LLP

28
By: 
Bryan J. Freedman
Attorneys for Defendants Edward Joseph Cascio,
James Victor Porte, and Angelikson Productions,
Inc.

PROOF OF SERVICE

I declare that I am over the age of eighteen (18) and not a party to this action. My business address is 2029 Century Park East, Suite 2600, Los Angeles, California 90067.

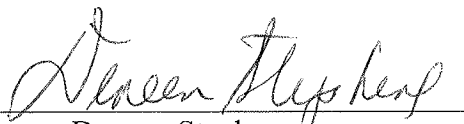
On November 18, 2015, I served the following documents: **JOINT STATUS CONFERENCE REPORT** on the interested parties in this action by placing a true and correct copy of each document thereof, enclosed in a sealed envelope, addressed as follows:

Ray E. Gallo, rgallo@gallo-law.com Dominic Valerian, dvalerian@gallo-law.com GALLO LLP 1299 4 th Street, Suite 505 San Rafael, CA 94901 Fax: (415) 257-8844	<i>Attorneys for Plaintiff Vera Serova</i>
Howard Weitzman, hweitzman@kwikalaw.com Suann C. MacIsaac, smacisaac@kwikalaw.com KINSELLA WEITZMAN ISER KUMP & ALDISERT LLP 808 Wilshire Blvd., Fl. 3 Santa Monica, CA 90401 Fax: (310) 566-9850	<i>Attorneys for Defendants Sony Music Entertainment; MJJ Productions, Inc.; and John Branca, as co-executor of the Estate of Michael J. Jackson</i>
Bryan J. Freedman, bfreedman@ftllp.com Jordan Susman, jsusman@ftllp.com Sean M. Hardy, smhardy@ftllp.com FREEDMAN AND TAITELMAN, LLP 1901 Avenue of the Stars, Suite 500 Los Angeles, CA 90067 Fax: (310) 201-0045	<i>Attorneys for Defendants Edward Joseph Cascio, James Victor Porte, and Angelikson Productions LLC</i>

(X) (BY NOTICE OF ELECTRONIC FILING THROUGH CASE ANYWHERE). I electronically served a true and correct copy of the document on counsel of record listed to receive transmissions through CaseAnywhere.

Executed on November 18, 2015 at Los Angeles, California.

(X) (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.


Deneen Stephens