

1 **Joseph D. Schleimer - Bar No. 125049**
2 **9401 Wilshire Boulevard, Suite 1250**
3 **Beverly Hills, California 90212**
4 **Telephone: (310) 273-9807**
5 **Telecopier: (310) 273-9809**
6 **schleimerlaw@msn.com**

7 Attorney for Plaintiff Sam Lutfi

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

APR 01 2011

John A. Clarke / Executive Officer / Clerk
By Amber Lafleur-Clayton Deputy
AMBER LAFLEUR-CLAYTON

8 **SUPERIOR COURT OF CALIFORNIA**
9 **FOR LOS ANGELES COUNTY**

10 **SAM LUTFI, an individual,**

11 **Plaintiff,**

12 **vs.**

13 **LYNNE IRENE SPEARS, an**
14 **individual; JAMES PARNELL**
15 **SPEARS, an individual; BRITNEY**
16 **JEAN SPEARS, an individual; and**
17 **DOES 1 through 25, inclusive,**

18 **Defendants.**

Case No. BC 406904

SEPARATE STATEMENT IN
SUPPORT OF MOTION TO COMPEL
PRODUCTION OF DOCUMENTS BY
DEFENDANT/CONSERVATOR
JAMES PARNELL SPEARS

[Motion to Compel and Supporting
Declarations Filed Concurrently
Herewith]

Date: June 15, 2011
Time: 8:30 a.m.
Dept.: 23 (Hon. Zaven V. Sinanian)

Trial: January 23, 2012
D.C.O.: December 25, 2011

19 **TO THIS HONORABLE COURT AND TO DEFENDANTS AND TO THEIR**
20 **COUNSEL OF RECORD HEREIN:** Plaintiff Sam Lutfi hereby submits his
21 Separate Statement in Support of his Motion to Compel Production of
22 Documents by Defendant/Conservator James Parnell Spears:
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11/15/2014

1 **Demand for Production No. 2**

2 Any and all DRUG TEST REPORTS concerning tests of Britney Spears
3 taken during the period October 1, 2007 through March 1, 2008.

4 "DRUG TEST REPORT," as used in these document demands,
5 refers to any DOCUMENT written by or memorializing information
6 supplied by any individual, entity or laboratory engaged to take a
7 sample, analyze a sample, or report on laboratory analysis of a
8 human drug test.

9 **Defendant James Parnell Spears Response to Demand No. 2:**

10 Objection: This request is not reasonably calculated to lead to the
11 discovery of admissible evidence.

12 Objection. This request seeks documents that, to the extent they exist
13 (and no such representation is intended or implied hereby), may be subject to
14 court orders, privacy rights, confidentiality obligations and/or other privileges
15 or protections that prevent their disclosure. For example, and without
16 limitation, there is currently a court-ordered and supervised conservatorship
17 in place as to Britney Spears. To the extent this request calls for the
18 production of documents concerning said conservatee and/or that are within
19 the possession, custody or control of court-appointed conservators, said
20 request has been propounded to the wrong party and should, if at all, be
21 directed to said conservators for response.

22 **James Parnell Spears-as-Conservator Response to Demand No. 2:**

23 The Co-Conservators [James Parnell Spears and Andrew M. Wallett]
24 repeat and incorporate by this reference each of their General Objections
25 herein including, without limitation, their objection that the Demands are
26 improperly directed to the Conservatee, who has not and will not appear in
27 this action, thereby precluding a meaningful response. The Co-Conservators
28 further object on the grounds that the Demand invades rights of privacy

DFP

1 and/or protections of the Conservatee and/or her children from Plaintiff who
2 is the express subject of a 3-year restraining order issued by the Los Angeles
3 Superior Court in 2009 to protect the Conservatee and her family. The Co-
4 Conservators further object to the extent the Demand does not seek
5 information that is relevant or reasonably calculated to lead to the discover of
6 admissible evidence.

7 **ARGUMENT TO COMPEL DEMAND FOR PRODUCTION NO. 2:**

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9 **Summary of Argument to Compel**

10 Plaintiff moves to compel production of drug tests administered to
11 Britney Spears during the period October 1, 2007 through March 1, 2008
12 because Defendants falsely accused Plaintiff of trying to “drug Britney Spears
13 into a coma,” and this *scientific* evidence is needed to refute that allegation.

14 • The drug tests are pertinent to the *libel* cause of action because
15 Defendant Lynne Spears’ book published the false and defamatory allegation
16 that Plaintiff admitted he was trying to drug her daughter into a coma.

17 • The drug tests are pertinent to the *battery* cause of action against
18 James Parnell Spears because he assaulted Plaintiff *twice*, and now asserts
19 affirmative defenses of justification and “defense of a child,” based on the false
20 allegation that Plaintiff was trying to drug his daughter into a coma.

21 • The drug tests are pertinent to the *breach of contract* cause of
22 action because, as Conservator, James Parnell Spears terminated Plaintiff’s
23 management of Britney Spears based on the false allegation that Plaintiff was
24 trying to drug Britney into a coma.

TT/DA/PG

1 **A. Introduction**

2 Plaintiff Sam Lutfi is suing James Parnell Spears ("James Parnell") for
3 *battery* because said Defendant assaulted Plaintiff on January 28, 2008 and
4 January 29, 2008.¹ In his Answer, James Parnell pleaded the affirmative
5 defenses of "provocation" and "defense of a child" under Civil Code §50, based
6 on the allegation that Plaintiff was trying to drug his daughter, Britney Spears
7 ("Britney"), into a coma.²

8 James Parnell also filed an Answer as Britney's Conservator,
9 responding to Plaintiff's cause of action for breach of the management
10 contract dated October 13, 2007. The Conservators' primary defense is that
11 there was "good cause" to terminate Plaintiff because he was allegedly trying
12 to drug Britney into a coma, cutting her telephone wires, disabling her cell
13 phones and disabling her automobiles.

14 Although it was Britney who hired Sam Lutfi as her manager, Britney
15 never fired Mr. Lutfi. Rather, it was James Parnell, acting as her Conservator,
16 who breached the contract, and the breach took place as follows:

17 On January 31, 2008, after Britney refused to take anti-psychotic
18 medication, her psychiatrist, Deborah Nadel, M.D., ordered a 72-hour Welfare
19 & Institutions Code §5150 hold. Against her will, Britney was transported to
20 the UCLA Medical Center by the LAPD.³ James Parnell immediately sought
21 appointment as Britney's Conservator, and his first act was to terminate
22 Plaintiff as Britney's manager.

23 _____
24 ¹ Declaration of Plaintiff Sam Lutfi, ¶2

25 ² Answer of Defendant James Parnell Spears to First Amended
26 Complaint at 2:1-23 (First, Second, Third Affirmative Defenses)

27 ³ Lutfi Dec., ¶2. Defendant Lynne Spears has repeatedly published the
28 falsehood that Plaintiff Lutfi initiated the §5150 hold. Actually, Mr. Lutfi
attempted to *dissuade* Dr. Nadel from ordering the hold. *Id.*, n.2

1 As Court-appointed, Conservator, Mr. Spears could have terminated
2 Plaintiff as manager with a *telephone call*.

3 However, Defendant knew that his daughter did not want her manager
4 terminated, so he sought a Temporary Restraining Order (TRO), in effect using
5 Court process to serve as Mr. Lutfi's "pink slip."

6 In his *ex parte* application for a TRO, James Parnell alleged that "**Mr.
7 Lutfi drugged Britney. He has cut Britney's home phone lines and
8 removed her cell phone chargers.**"⁴

9 All of these allegations were false, but the application was *ex parte*,
10 without notice and therefore unopposed. The sole "evidence" filed in support
11 was a Declaration of Lynne Spears, which stated:

12 "Sam [Lutfi] told Jackie and me that he grinds up Britney's pills,
13 which were on the counter and included Risperdol and Seroquel.
14 He told us that he puts them in her food and that that was the
15 reason she had been quiet for the last three days (she had been
16 sleeping). He told us that the doctor who is treating her now is
17 trying to get her into a *sleep-induced coma* so that they could then
18 give her drugs to heal her brain."⁵

19 As attested to by Mr. Lutfi in the declaration filed concurrently
20 herewith, Lynne Spears' declaration constituted *naked perjury*.⁶

21 Moreover, four third-party witnesses have stepped forward and filed
22 declarations refuting Lynne Spears' scandalous allegations, including Robin
23 Johnson, the chief "baby monitor" who was stationed in the residence to
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26 ⁴ Exhibit 15 at p.6

27 ⁵ Exhibit 15 at p.11, ¶13 (emphasis added)

28 ⁶ Lutfi Dec., ¶2

1 observe Britney's drug and alcohol use and mothering behavior.⁷

2 James Parnell, as Conservator, refused to pay Mr. Lutfi's management
3 fees, which is the basis for the breach of contract cause of action. The issue of
4 whether the refusal to pay constitutes a breach is clearly going to hinge on the
5 truth or falsity of the allegations made in the TRO application and Lynne
6 Spears' declaration, including the amazing claim that Plaintiff was not just
7 trying to drug Britney Spears into a coma – he supposedly admitted it to *her*
8 *mother*.

9 Shortly after it was filed, the TRO application was disseminated to the
10 news media under the cloak of Civil Code §47 immunity. Within hours, Sam
11 Lutfi was *world famous* as “the guy who drugged Britney Spears.”⁸

12 Lynne Spears completed the destruction of Plaintiff's reputation six
13 months later, when she published her autobiography, *Through the Storm*, in
14 which she blamed Plaintiff for her daughter's breakdown and republished the
15 absurdly false allegation that Mr. Lutfi *admitted* to her that he was trying to
16 drug her daughter into a coma.

17 Mrs. Spears' libelous book is now the subject of Mr. Lutfi's *defamation*
18 cause of action, and the drug tests and baby monitor reports are sought to
19 demonstrate *falsity*, an element of that cause of action.

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21 **B. Factual Background – Drug Use and Crisis**

22 It is truly ironic that James Parnell and Lynne Spears successfully
23 tarred Plaintiff as “the guy who drugged Britney Spears,” since Mr. Lutfi did
24 everything he could to *discourage* Britney from taking drugs, whereas Mr. and
25

26 ⁷ Exhibit 14, Declaration of Robin Johnson. See, also, Declarations of
27 Alli Sims, Adnan Ghalib, and Filipe Teixeira, on file herein.

28 ⁸ Lutfi Dec., ¶2

1 Mrs. Spears are the root causes of their daughter's problems:

2 James Parnell is an alcoholic, and he was chronically drunk and
3 abusive toward his family while Britney was a child.⁹ The children of alcohol
4 and substance abusers are far more likely to suffer from the same problem,
5 and that's the example James Parnell set.

6 Lynne Spears, who has been described as "the ultimate, controlling
7 stage mother," actually *introduced* Britney to the use of "uppers" as a method
8 of *weight control* when Britney was still a teenager.¹⁰ In other words, the
9 addiction to "speed" which ultimately caused Britney's breakdown can be
10 traced right back to the woman who put the blame on Sam Lutfi.

11 At trial, Mr. Lutfi will present proof (including testimony of witnesses
12 from the company he hired), that one of the first things he did as Britney's
13 manager was to bring *drug-sniffing dogs* into Britney's residence, and with
14 their assistance he scoured the mansion clean of illegal substances. After the
15 drug cache was discovered and removed, he vacuumed, carpet-cleaned and
16 scrubbed to eliminate all drug residues and child-proof the residence for
17 Britney's two infant boys.¹¹

18 For a while, it worked. During the first weeks of Mr. Lutfi's management
19 contract, in October, 2007, Britney's drug tests were "clean." Unfortunately,
20 in November, 2007 she relapsed and began testing positive for amphetamines.
21 Why? Because she was using Adderall (dextroamphetamine), a prescription
22 "upper" which is highly addictive and causes insomnia, agitation and manic
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26 ⁹ Lutfi Dec., ¶3

27 ¹⁰ Lutfi Dec., ¶3

28 ¹¹ Lutfi Dec., ¶3

1 behavior. Plaintiff tried to dissuade Britney from using Adderall, but failed.¹²

2 Britney told Plaintiff that her mother, Lynne Spears, introduced her to
3 Adderall as a means of weight control following an appearance on the 2007
4 MTV Music Video awards, wherein Britney danced in a skimpy outfit which
5 revealed her post-pregnancy weight gain.¹³ Actually, Britney's weight was
6 perfectly healthy for a recent mother, but her costume displayed her maternal
7 figure, and that was inconsistent with her sex-object image. The tabloids
8 savaged her, the critics were merciless, and she was parodied on the National
9 Lampoon television program, which had a fat, middle-aged man wearing a
10 Britney wig and jiggling about, wearing the same skimpy outfit.

11 To "help" Britney take the weight off after the MTV program, Britney's
12 mother got her daughter hooked on an new amphetamine drug - Adderall.¹⁴

13 In the months *before Plaintiff became Britney's manager*, her
14 nightclubbing, drinking and drug use had caught up with her. After a series
15 of motor vehicle incidents and criminal charges (hit-and-run, driving without
16 a license, driving with her child in her lap), Britney lost legal custody of her
17 infant sons, Jayden and Preston. She retained visitation rights, subject to
18 strict conditions (including the presence of baby monitors), but she suffered
19 increasingly severe separation anxiety whenever she had to return physical
20 custody to her ex-husband.¹⁵

21 As mentioned, in October, 2007, during the first weeks of Mr. Lutfi's
22 management term, Plaintiff got Britney *completely off drugs*, and her drug
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25 ¹² Lutfi Dec., ¶4

26 ¹³ Lutfi Dec., ¶3

27 ¹⁴ Lutfi Dec., ¶3

28 ¹⁵ Lutfi Dec., ¶4

1 tests came back "clean." However, in November, 2007, she relapsed and
2 began testing positive for amphetamine. She was taking Adderall, and Mr.
3 Lutfi tried to *persuade her to stop*, but he did not succeed.¹⁶

4 On January 3, 2008, after an extended period of insomnia and
5 increasingly manic behavior (almost certainly caused by the Adderall), Britney
6 locked herself into a bathroom with one of her boys and refused to relinquish
7 physical custody. This quasi-hostage situation came to the attention of the
8 authorities, and with an unruly mob of paparazzi photographers and
9 television crews in hot pursuit, Britney was transported to Cedars-Sinai
10 Medical Center under a Welfare & Institutions Code §5150 hold.¹⁷

11 After the "hold," the Superior Court suspended Britney's visitation
12 rights. Losing contact with her sons sent Britney on a downward spiral.¹⁸

13 Through the bleak days of January, 2008 – traumatized by the loss of
14 all contact with her boys – Britney's manic episodes became increasingly
15 severe, and she began staying awake for days at a time. Mr. Lutfi tried to find
16 out how she was getting her drugs because he wanted to cut off her supply.
17 He also confronted her and tried to convince her to finally stop using
18 Adderall.¹⁹

19 At that point, Britney's family law attorneys retained a psychiatrist,
20 Deborah Nadel, M.D., who began making *nightly house calls*. After observing
21 Britney's deterioration and escalating mental instability, Dr. Nadel prescribed
22 powerful, anti-psychotic medications. Britney did not want to take them
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25 ¹⁶ Lutfi Dec., ¶4

26 ¹⁷ Lutfi Dec., ¶4

27 ¹⁸ Lutfi Dec., ¶4

28 ¹⁹ Lutfi Dec., ¶4

1 because they made her drowsy, and Plaintiff had little success at getting her
2 to follow Dr. Nadel's prescription. Instead, almost certainly under the
3 influence of Adderall, she was experiencing manic, sleepless episodes which
4 lasted for days at a time.²⁰

5 On the evening of January 28, 2008, Plaintiff was driving Britney back
6 to her residence for her nightly session with her psychiatrist when she
7 impulsively decided she wanted to visit her boyfriend instead. Plaintiff
8 explained that the psychiatric session was essential for her custody case and
9 insisted that she meet with Dr. Nadel. As Plaintiff pulled up to the entrance to
10 Britney's gated community, in the presence of scores of paparazzi
11 photographers and television crews, Britney leapt from Plaintiff's car and
12 began crying hysterically – while the photographers snapped pictures and the
13 video cameras whirred.²¹

14 Plaintiff tried to get Britney back into his car, but she refused, cried
15 louder, and made a scene for the paparazzi. Plaintiff lost his temper and
16 began arguing with her, and of course the argument was captured by the
17 scores of photographers and video crews who congregate outside Britney's
18 gateway 24 hours a day. Within minutes, the argument was on the news and
19 the internet.²²

20 Upon learning about the argument, James Parnell and Lynne
21 rushed to Britney's home. James Parnell had no legal right to be in the
22 residence: Britney had accused her father of being violent, drunken and
23 *abusive*, she had permanently banned him from her home, and her security
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26 ²⁰ Lutfi Dec., ¶4

27 ²¹ Lutfi Dec., ¶4

28 ²² Lutfi Dec., ¶4

1 detail was under a standing order not to let him in.²³

2 Unfortunately, when Sam Lutfi ordered the gates opened to allow Lynne
3 to enter, James Parnell rushed into the residence alongside his ex-wife – and
4 immediately *assaulted* Plaintiff.²⁴ (Mr. Lutfi retreated in front of James’ balled
5 fists and out-of-control temper. James Parnell is an ex-welder and a powerful
6 man; he was in a rage, and Plaintiff was afraid for his life.²⁵)

7 Later that evening, Britney had her father *ejected* from her home, but
8 the next day, James Parnell managed to gain entrance to the residence again,
9 and this time he delivered a powerful blow to Plaintiff’s solar plexus, knocking
10 the wind out of him. James Parnell, who has a long history of violence, then
11 threatened to *kill* Plaintiff.²⁶

12 James Parnell’s intrusions and violent outbursts could not have come
13 at a worse time, since Britney was experiencing her worst manic episode ever.
14 She was taking Adderall instead of her anti-psychotic medication, and Dr.
15 Nadel warned that Britney would either have to follow the prescription or she
16 was going to order *another* §5150 hold. Plaintiff could not persuade Britney to
17 take her medication, so Dr. Nadel ordered the “hold” on January 31, 2008.²⁷

18 What followed was a media spectacle: The LAPD ejected the paparazzi
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20 ²³ Lynne Spears detailed her ex-husband’s drunken, abusive history in
21 her book, *Through the Storm*. She describes a culminating moment (before the
22 divorce) when she became so frustrated by James Parnell’s out-of-control
23 drinking she picked up a shotgun and shot up his liquor supply.

24 ²⁴ Lutfi, ¶5. A detailed account of this assault is set forth in Lynn
25 Spears’ book, *Through the Storm*. It is clear from her description that she
26 *enjoyed* watching her ex-husband terrorizing Mr. Lutfi.

27 ²⁵ Lutfi Dec., ¶5

28 ²⁶ Lutfi Dec., ¶5

²⁷ Lutfi Dec., ¶6

1 from the street outside Britney's gated community; motorcycle officers cleared
2 the route between Britney's home and UCLA; and an LAPD helicopter hovered
3 overhead as the police took Britney to the UCLA Medical Center in a style
4 equivalent to a presidential motorcade. These precautions were intended to
5 keep the media at bay, but of course the paparazzi – who monitor police radio
6 frequencies – were already at UCLA when the motorcade arrived.²⁸

7 During the period when Plaintiff stands accused of trying to “drug
8 Britney into a coma,” she was taking frequent *drug tests* in connection with
9 the ongoing custody case. As her manager, Plaintiff coordinated with Britney's
10 attorneys and made certain she complied with the Court's child-visitation
11 orders, including the drug tests.²⁹ As Plaintiff's manager, Mr. Lutfi also
12 learned the *results* of the drug tests, although he did not always receive a
13 copy.³⁰

14 Plaintiff propounded Demand for Production (“DFP”) No. 2 to obtain
15 *copies* of the drug test reports, because they are relevant to all three causes of
16 action: First, on the cause of action for breach of contract, James Parnell,
17 acting as Conservator, terminated Mr. Lutfi based on the allegation that he
18 was “drugging Britney into a coma,” and the drug tests are sought to *refute*
19 this allegation. Second, James Parnell pleaded the affirmative defenses of
20 “provocation” and “defense of a child” and those defenses pivot on the legal
21 theory that he was *privileged to assault Mr. Lutfi* because Plaintiff was
22 supposedly trying to drug his daughter into a coma. Once again, the drug
23 tests are sought as scientific evidence to *refute* the allegation made by James
24 Parnell and they are indisputably discoverable. And finally, the drug tests are

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26 ²⁸ Lutfi Dec., ¶6

27 ²⁹ Lutfi Dec., ¶7

28 ³⁰ Lutfi Dec., ¶7

1 relevant to the *libel* cause of action, because Lynne Spears's book published
2 the defamatory allegation that Plaintiff was trying to drug Britney into a coma
3 and the drug tests will prove *falsity*.

4 Accordingly, the Court should order Defendant to produce the drug
5 tests forthwith.

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1 **Demand for Production No. 3**

2 Any and all BABY MONITOR REPORTS concerning Britney Spears
3 and/or her children, pertaining to any period between October 1, 2007 and
4 March 1, 2008.

5 "BABY MONITOR REPORT," as used in these Demands for
6 Production, refers to any DOCUMENT written by or memorializing
7 information supplied by individuals retained to monitor the
8 mothering activities of Britney Spears, the care and custody of
9 Britney Spears' children, and/or conditions or activities taking
10 place in Britney Spears' home.

11 **James Parnell Spears Response to Demand No. 3:**

12 Objection: This request is not reasonably calculated to lead to the
13 discovery of admissible evidence.

14 Objection. This request seeks documents that, to the extent they exist
15 (and no such representation is intended or implied hereby), may be subject to
16 court orders, privacy rights, confidentiality obligations and/or other privileges
17 or protections that prevent their disclosure. For example, and without
18 limitation, there is currently a court-ordered and supervised conservatorship
19 in place as to Britney Spears. To the extent this request calls for the
20 production of documents concerning said conservatee and/or that are within
21 the possession, custody or control of court-appointed conservators, said
22 request has been propounded to the wrong party and should, if at all, be
23 directed to said conservators for response.

24 **James Parnell Spears-as-"Conservator" Response to Demand No. 3:**

25 The Co-Conservators [James Parnell Spears and Andrew M. Wallett]
26 repeat and incorporate by this reference each of their General Objections
27 herein including, without limitation, their objection that the Demands are
28 improperly directed to the Conservatee, who has not and will not appear in

1 this action, thereby precluding a meaningful response. The Co-Conservators
2 further object on the grounds that the Demand invades rights of privacy
3 and/or protections of the Conservatee and/or her children from Plaintiff who
4 is the express subject of a 3-year restraining order issued by the Los Angeles
5 Superior Court in 2009 to protect the Conservatee and her family. The Co-
6 Conservators further object to the extent the Demand does not seek
7 information that is relevant or reasonably calculated to lead to the discover of
8 admissible evidence.

9 **ARGUMENT TO COMPEL DEMAND FOR PRODUCTION NO. 3:**

10 *See discussion, above, in argument to compel DFP No. 2. Plaintiff hereby*
11 *incorporates said argument by reference, as though fully set forth herein.*

12 During the period Plaintiff served as Britney's manager, her child
13 custody lawyers positioned child visitation supervisors ("baby monitors")
14 *inside her residence*, to supervise visitations with her young children. These
15 professional observers were present to monitor Britney's use of drugs and
16 alcohol and witness her behavior toward her infant sons.³¹

17 Since Plaintiff was virtually living in Britney's residence during the
18 crisis months, he had extensive interactions with the "baby monitors," who
19 were therefore in an excellent position to observe his conduct and interactions
20 with Britney and her children.

21 If Plaintiff was trying to drug Britney into a coma, cutting her telephone
22 wires and disabling her cell phones, as Defendants allege, then the baby
23 monitors would have been *witnesses* to such conduct and their reports would
24 contain detailed descriptions. Plaintiff submits the reason why Defendants
25 will not produce the baby monitor reports is because they know the *absence*
26 of any report of such events will tend to refute Defendants' scandalous

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28 ³¹ Lutfi Dec., ¶8

1 allegations.

2 Robin Johnson, who was the *supervising* baby monitor, has already
3 filed a declaration attesting that Mr. Lutfi was *not* doing the nefarious things
4 he stands accused of.³² Among the documents Plaintiff seeks to compel are
5 contemporaneous reports *filed by Ms. Johnson*, which will corroborate her
6 testimony at trial.

7 As Britney's manager, Plaintiff was privy to the content of the baby
8 monitor reports,³³ and he knows they do not support the allegations made by
9 James Parnell. Defendant obviously knows that too, which is why he won't
10 produce them. During the "meet and confer," Defendant's counsel stood on
11 her objections and flatly refused to produce the baby monitor reports.³⁴
12 Accordingly, an order is needed to compel production.

13 *Respectfully submitted,*

14 **Dated: March 31, 2011**

**JOSEPH D. SCHLEIMER
ATTORNEY AT LAW**

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17
18 **BY:  Joseph D. Schleimer, Attorney
for Plaintiff Sam Lutfi**

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26 ³² Declaration of Robin Johnson (Exhibit 14), ¶¶ 2-19

27 ³³ Lutfi Dec., ¶8

28 ³⁴ Exhibit 12

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PROOF OF SERVICE
BY U.S. MAIL

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 9401 Wilshire Boulevard, Suite 1250, Beverly Hills, California 90212.

On ***April 1, 2011*** I served the foregoing document described as: ***SEPARATE STATEMENT IN SUPPORT OF MOTION TO COMPEL PRODUCTION OF DOCUMENTS BY DEFENDANT/CONSERVATOR JAMES PARNELL SPEARS [Motion to Compel and Supporting Declarations Filed Concurrently Herewith] *** on the interested parties in this action by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

See attached service list

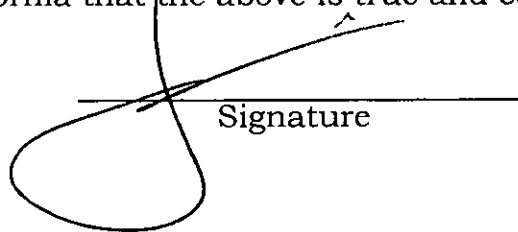
BY U. S. MAIL

I deposited the sealed envelopes in the United States mail at Beverly Hills, California, addressed as stated above. The envelopes were mailed with first class postage thereon fully prepaid.

Executed on ***April 1, 2011*** at Beverly Hills, California.

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

Joseph D. Schlein
Type or Print Name


Signature

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**Service List
Lutfi v Spears**

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Michael S. Adler, Esq.
Joel M. Tantalo, Esq.
Tantalo & Adler LLP
1901 Avenue of the Stars, Suite 1000
Los Angeles, California 90067
Fax No. (310) 734-8696

*Attorneys for Defendant/Appellant
Lynne Spears*

Leon J. Gladstone, Esq.
Gary R. Wallace, Esq.
Gladstone Michel Weisberg Willner &
Sloane ALC
4551 Glencoe Avenue, Suite 300
Marina Del Rey, CA 90292
Fax No. (310) 775-8775

*Attorneys for Defendant James P.
Spears*

Joel E. Boxer, Esq.
Bonita D. Moore, Esq.
Bird Marella Boxer Wolpert
Nessim Dooks & Lincenberg
1875 Century Park East, 23rd Floor
Los Angeles, California 90067
Fax No. (310) 201-2110

*Attorneys for James Spears as
Conservator of the Estate of Britney
Spears*