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

ANNA FEDOSEEVA, an individual,  
Petitioner,

v.

SERGEY GRISHIN, an individual,  
Respondent.

JENNIFER SULKESS, an individual,  
Petitioner,

v.

SERGEY GRISHIN, an individual,  
Respondent.

Case Nos. 18STR004283 and 18STR004284

**ANNA FEDOSEEVA'S AND JENNIFER  
SULKESS' CONSOLIDATED REPLY IN  
SUPPORT OF REQUEST FOR  
DOMESTIC VIOLENCE RESTRAINING  
ORDER, REQUEST FOR CIVIL  
HARASSMENT RESTRAINING ORDER,  
AND ALL ORDERS TO SHOW CAUSE  
FOR VIOLATIONS OF TEMPORARY  
RESTRAINING ORDERS**

Date: September 5, 2018  
Time: 8:30 a.m.  
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1 **I. INTRODUCTION**

2 Respondent Sergey Grishin has filed a Consolidated Opposition, addressing Petitioner Anna  
3 Fedoseeva's Request for Domestic Violence Restraining Order, Petitioner Jennifer Sulkess' Request  
4 for Civil Harassment Restraining Order, and the eleven (11) Orders to Show Cause on file for Mr.  
5 Grishin's violation of the Temporary Restraining Orders protecting Ms. Fedoseeva and Ms. Sulkess.  
6 In his Consolidated Opposition, Mr. Grishin does not deny that he sent any of the horrific messages to  
7 Ms. Fedoseeva and Ms. Sulkess. He does not claim that someone else sent them, nor does he claim  
8 that they were accidental or inadvertent.

9 Rather, he claims that they were entirely Ms. Fedoseeva's and Ms. Sulkess' fault. He says that  
10 he was upset with them because of their own behavior, and that they should have done more to  
11 prevent him from sending them messages with graphic pornography, direct threats against their lives,  
12 and taunting messages flouting his imperviousness to the Court's Orders. In fact, he spends a great  
13 deal of his opposition brief complaining that Ms. Fedoseeva and Ms. Sulkess did not report his  
14 behavior to Instagram sooner.

15 It is clear that Mr. Grishin believes himself to be above the law. Not only does he completely  
16 ignore Court Orders – he finds it entertaining to do so. For example, on August 15, 2018, he posted a  
17 video to his Instagram account, even after the Court issued a specific order banning him from using  
18 social media. In the video, he says, while laughing with his friends on a boat, that he “won't send  
19 anything to Instagram... she's prohibited me from using Instagram.” He then posted the video to  
20 Instagram anyway. On multiple occasions, Mr. Grishin has sent messages to Ms. Fedoseeva and Ms.  
21 Sulkess which refer directly to the Court's Orders and his knowing, intentional violation of the Orders,  
22 saying things like “[r]efer to court! And send this to the lawyers, don't forget” and “I don't care about  
23 your petition to an American court regarding your labored restraining order.” He believes that the  
24 rules do not apply to him, that there will be no repercussions for his actions, and that he can threaten,  
25 harass, and embarrass Ms. Fedoseeva and Ms. Sulkess as he pleases.

26 Mr. Grishin believes that he can paint himself as a humble, apologetic man prostrating himself  
27 before the Court. He completely ignores the horrifying messages he has sent to Ms. Fedoseeva and  
28 Ms. Sulkess and pretends as if the only issue before this Court is his questionable Instagram usage.

1 He puts forth “evidence” of his mental state that is dubious at best. This is a deliberate tactic to  
2 conceal his true actions from the Court. Mr. Grishin has been engaged in a campaign of harassment  
3 and abuse against Ms. Fedoseeva and Ms. Sulkess for months, and will not stop unless this Court  
4 punishes him for his repeated violations of its Orders.

5 Ms. Fedoseeva and Ms. Sulkess live every day in fear for their lives. They are constantly  
6 bombarded with threats, graphic pornography, and assaults on their characters and reputations. They  
7 have incurred enormous costs in pursuing the restraining orders, have been forced to hire private  
8 security and take extraordinary measures to protect their homes and travel arrangements, and have had  
9 their business interest harmed. Their lives have been ruined by Mr. Grishin.

10 Ms. Fedoseeva and Ms. Sulkess respectfully plead with this Court to issue permanent  
11 Restraining Orders protecting them to the fullest extent of the law. Mr. Grishin is demonstrably  
12 unstable and a physical, psychological, and reputational threat to them. He should be prohibited from  
13 any further contact, whatsoever.

14 Further, they respectfully request that this Court issue strong, clear punishment for Mr.  
15 Grishin’s violation of the Temporary Restraining Orders. It is clear that, absent such punishment, Mr.  
16 Grishin will simply continue harassing and threatening Ms. Fedoseeva and Ms. Sulkess, without a care  
17 in the world. This Court’s Orders have been thoroughly disregarded, and the only way to ensure Mr.  
18 Grishin’s compliance with the permanent Restraining Orders is through a demonstration of this  
19 Court’s power over him.

20 Mr. Grishin is not the victim here. He assaulted Ms. Fedoseeva and threatened to murder her  
21 multiple times. Ms. Sulkess has been continuously threatened, harassed, and defamed by Mr. Grishin,  
22 and is in constant fear for her physical safety. The Court’s duty is to protect Ms. Fedoseeva and Ms.  
23 Sulkess, not to coddle Mr. Grishin while turning a blind eye to his cruel and illegal actions.

24  
25 **II. MR. GRISHIN’S THREATENING AND HARASSING ACTIONS PRIOR TO JUNE 3**

26 Mr. Grishin attempts to argue that he should be forgiven for his actions because he was thrown  
27 into emotional turmoil by the physical altercation between himself and Ms. Fedoseeva on June 3,  
28 2018. This is simply false, as he was already engaged in severe emotional and verbal abuse of Ms.



Fedoseeva and Ms. Sulkess even before June 3.

The full extent of the abuse Ms. Fedoseeva and Ms. Sulkess have suffered is detailed in their respective requests for restraining orders, but some of the most egregious examples are excerpted below:

- On May 12, 2018, Mr. Grishin sent Ms. Fedoseeva a message stating that his “Glock” has a “15-round clip.” He says, “13 for you, 2 in any case for me, if there’s a misfire.” Declaration of Anna Fedoseeva dated June 19, 2018 (“Fedoseeva Decl.”) at ¶ 7, Ex. A; *see also* translation at Declaration of Jessica R. Corpuz dated June 18, 2018 (“Corpuz Decl.”), Ex. A.
- That same day, he sent Ms. Fedoseeva another message, stating that he would have killed her and then himself “[p]ublicly, in a restaurant” if it were not for his fiancée. He said, “[b]ut imagine how beautiful it would be – a crowd of people, cameras, you at the point of a pistol. Everything broadcast live on YouTube and Instagram and my website. I deliver a well-prepared speech, an accusatory one, and explain why I made the decision. Everything happens at the Four Seasons, on the boulevard, in daytime when there’s plenty of light. Special bullets so they bury you in a closed casket. I end my speech, ask everyone’s forgiveness for the inconvenience. And I begin... I had it all in my head, down to the details.” *Id.*
- On June 1 – just two days before he would go on to physically assault Ms. Fedoseeva – he said, “I will simply punish you by cutting you up piece by piece, from the tail. Until I reach your head. THAT’S WHAT’LL HAPPEN.” He says that her life has “ended” and that there will be “nothing good anymore.” Fedoseeva Decl. at ¶ 12, Ex. F; translation at Corpuz Decl., Ex. F.
- That same day, he told Ms. Fedoseeva, “[h]ere’s the difference between a threat and a plan. A threat is: I will destroy you, I will kill you! A plan is: I know where you live, I know your whole security system. I have observed you for a month and see that you usually wake at 9, then you have breakfast, then you get ready, then you go to the garage. You have such-and-such car. On such-and-such date, when you leave the garage, you will suddenly have a flat tire at the exit. You will have to get out of the car. And I will be waiting for you there, with a knife. There are no cameras at that location, I’ve checked. The essence is the same... But the approach is fundamentally different! That’s the difference between a threat and a plan.” Fedoseeva Decl. at ¶ 14, Ex. H; translation at Corpuz Decl., Ex. H.
- On March 29, he told Ms. Sulkess that he is a “Russian billionaire” who has “zero” enemies. He names her birthday, and states that he has done a full background check on her, including property ownership, car records, recent addresses, and more. He states, “I did not like what was going on between you and Anna [Fedoseeva] and have all the reasons in the world to hate you and make your life much more complicated.” Declaration of Jennifer Sulkess dated June 18, 2018 (“Sulkess Decl.”) at ¶ 11, Ex. H.
- Mr. Grishin set up a publicly-accessible website – [www.loveandtreason.com](http://www.loveandtreason.com) – and sent Ms. Sulkess a link to it with the text “[p]lease check some moments of the private life of Anna Fedoseeva, Sergey Grishin and Jennifer Sulkess.” The website includes private pictures that neither Ms. Sulkess nor Ms. Fedoseeva sent Mr. Grishin. The website states, “[t]his site is the love story of Sergey Grishin to Anna Fedoseeva. And treason, unheard of, that happened in this love. Site about treason of friends, that Sergey new [sic] 30 and 15 years. Site about monstrous lies and insincerity.” Sulkess Decl. at ¶¶ 13-14, Ex. J-K.

All of this occurred before June 3, 2018. Mr. Grishin cannot explain away his direct threats to Ms. Fedoseeva and Ms. Sulkess by saying that he was simply aggravated after the June 3 incident. He was already engaged in threatening and harassing conduct well before that date.

1 **III. MR. GRISHIN ATTACKED MS. FEDOSEEVA ON JUNE 3, 2018, AND THEN**  
2 **BRAGGED ABOUT IT**

3 Mr. Grishin claims that Ms. Fedoseeva attacked him on June 3, 2018 and left him with a head  
4 wound. His story is laughable.

5 The day after the attack, Ms. Fedoseeva filed a police report, stating that he pointed a gun at  
6 her and told her to strip naked. As she was taking off her pants, he told her that he had “planned  
7 everything” and “would make it look as if [she] had attacked him with a knife that he had prepared  
8 and laid on the table.” Ms. Fedoseeva managed to grab the gun and a struggle ensued. He struck her  
9 hard on her head and body several times with his head and fist, including “headbutting” her. His  
10 attack left her bloodied and bruised, with several cracked and missing teeth. Fedoseeva Decl. at ¶ 16-  
11 19, Ex. J; translation at Corpuz Decl., Ex. I. Ms. Fedoseeva has also filed photographs of the injuries  
12 Mr. Grishin caused her, the blood on her clothes from that night, and showing her still-missing teeth.

13 Mr. Grishin’s Request for Domestic Violence Restraining Order – which was signed on June  
14 15, before he saw Ms. Fedoseeva’s police report – states that Ms. Fedoseeva “pulled a knife and  
15 attacked [him]” and “attempted to cut [him] with the knife.” Mr. Grishin states in his July 10  
16 declaration that she “attacked me by attempting to cut me with [a] switchblade.” He has now added to  
17 his story by submitting a picture and/or video of himself with a head wound.

18 This story matches up with exactly what he told Ms. Fedoseeva on the night of his attack – that  
19 he would frame her for attacking him with a knife. He clearly concocted this story when he believed  
20 that he would be the only party going to Court, and now has no evidence whatsoever to dispute Ms.  
21 Fedoseeva’s story.

22 Further, if Mr. Grishin did suffer a head wound that night (which is theoretically possible since  
23 he headbutted Ms. Fedoseeva), it healed remarkably well. By June 5, just two days after his attack on  
24 Ms. Fedoseeva, Mr. Grishin posted a photo of himself to Instagram looking happy and healthy, with  
25 the caption “Back in LA from Moscow! Now it’s time to enjoy my family! [emoji with tongue  
26 sticking out] [hug emoji].” Again on June 11, he posted a photo of himself to Instagram looking  
27 perfectly healthy. Sulkess Decl. at ¶¶ 26-28, Exs. S-V. If he was injured, it was a minor injury and it  
28 is likely that his photos and videos of that night are highly exaggerated for effect.

Further, Mr. Grishin has no independent evidence of his story and no witnesses. Once again, Mr. Grishin provides no police report or any support for his repeated claims that Ms. Fedoseeva is being investigated by law enforcement. In comparison, Ms. Fedoseeva has a contemporaneous police report detailing her story, and immediately reported it to Ms. Sulkess. *See* Sulkess Decl. at ¶¶ 21.

In short, Mr. Grishin's statements are entirely unreliable and cannot be trusted.

In fact, he immediately admitted the attack. On June 4 – the day after he the assault – he sent Ms. Fedoseeva a message in which he admits breaking her teeth, and states that a doctor can give her a “new Hollywood smile.” He says that “you’re nobody to me in a fight.” Fedoseeva Decl. at ¶ 20, Ex. K; translation at Corpuz Decl., Ex. J.

On June 8, 2018, he told Ms. Sulkess that Ms. Fedoseeva “is not this pretty any more. Missing some teeth.” Sulkess Decl. at ¶ 24, Ex. R.

These are not the actions of a man who was attacked; Mr. Grishin is flaunting the fact that he assaulted Ms. Fedoseeva. There can be no question as to what happened on the night of June 3 – Mr. Grishin viciously attacked Ms. Fedoseeva and planned to frame her for assault. Mr. Grishin is an incredibly dangerous man, and will continue to hurt Ms. Fedoseeva if not restrained by this Court.

**IV. AFTER JUNE 3, MR. GRISHIN SENT THREATENING, HARASSING, AND PORNOGRAPHIC MESSAGES TO MS. FEDOSEEVA AND MS. SULKESS, IN KNOWING VIOLATION OF THE TEMPORARY RESTRAINING ORDERS**

Mr. Grishin tries to shrug off his actions after June 3 by focusing on Instagram's reporting features or his own mental state. This completely ignores the terrifying and disgusting messages he has sent directly to Ms. Fedoseeva and Ms. Sulkess since June 3, entirely apart from his activities on social media. Below is just a small sample of the abuse Ms. Fedoseeva and Ms. Sulkess have endured since June 3:

- On June 11, he stated that a “sentence” has been issued against Ms. Fedoseeva and that “it will be very awful” and “happen to everyone too... and to your mother too. You will all be living vegetables. And good luck trying to stop me.” Fedoseeva Decl. at ¶ 24, Ex. O; translation at Corpuz Decl., Ex. N.
- On June 17, he stated to Ms. Fedoseeva that he would “wipe out all memories and the possibility of those memories from your friends and family.” Fedoseeva Decl. at ¶ 25, Ex. P; translation at Corpuz Decl., Ex. O.

- 1 • On July 1, Mr. Grishin sent messages to Ms. Fedoseeva's mother, including videos of an  
2 unidentified woman dancing naked in Mr. Grishin's Los Angeles condominium, and  
3 performing a sexual act on Mr. Grishin. *See* Order to Show Cause dated July 3, 2018.
- 4 • On July 2, 2018, he stated to Ms. Fedoseeva's mother: "And Fedoseeva, I don't care about  
5 your petition to an American court regarding your labored restraining order. You're a Russian  
6 citizen, with a registered address in my apartment. You're physically located in Bumfuck  
7 Egypt with the other cunts. While I'm flying over the Atlantic. But the supreme law of the  
8 United States, the Constitution, the Law of the Land! So go fuck yourself.... Watch what will  
9 come of this. This message is being sent to somewhere around 60 of my most VARIOUS  
10 contacts. So more accurately, don't flip over on the turns!" *See* Order to Show Cause dated  
11 July 3, 2018.
- 12 • On July 4, Mr. Grishin sent messages directly to Ms. Fedoseeva, including photos of his  
13 customs forms showing his entry to the United States. He also stated: "July 4. DEFCON –  
14 Wikipedia [link to Wikipedia website]. You know this? I'm now at DEFCON 1. What do  
15 you think, what good to me are 3 million euros cash in America? Solve the problem. Refer to  
16 court! And send this to the lawyers, don't forget." *See* Order to Show Cause dated July 6,  
17 2018.
- 18 • On July 9, Ms. Fedoseeva and Ms. Sulkess, along with many others, received an email from  
19 Mr. Grishin with an attachment containing an audio file which appears to contain an audio  
20 recording of him engaged in sexual activity. It was sent with the text, "Enjoy and have fun!"  
21 *See* Orders to Show Cause dated July 10, 2018.
- 22 • On July 9, he stated to both Ms. Fedoseeva and Ms. Sulkess, "I don't GIVE A SHIT ABOUT  
23 SERGEY ANATOLYEVICH, IVANOVICH, KOZUKHETOVICH. Keep them. Toughs.  
24 THEY'RE ALL GONNA DIE. YOU TOO. AND EVERYONE YOU KNEW AND KNOW.  
25 KEEP THEM. I NEVER BOTHERED ANYONE. I WANTED A FAMILY AND  
26 CHILDREN. THEY SCOFFED? THEY SNEERED? MY TURN. MINE. MAY THE  
27 DEVIL RISE UP. MAY HE DO HIS JUSTICE." [sic]. *See* Orders to Show Cause dated July  
28 10, 2018.
- Also on July 9, he sent message to Ms. Fedoseeva's mother containing graphic videos of  
himself and others engaged in sexual activity. *See* Orders to Show Cause dated July 10, 2018.
- Again on July 10, he sent Ms. Sulkess, Ms. Fedoseeva, and Ms. Fedoseeva's mother additional  
graphic videos of himself and others engaged in sexual activity. He delights in zooming in on  
the genitals of the women in his videos. He also included a video of a woman performing a  
sexual act on him. *See* Orders to Show Cause dated July 13, 2018.
- On July 16, he sent Ms. Sulkess and Ms. Fedoseeva several new videos, including of  
unidentified women engaged in sexual activity. He also sent them videos which were later  
posted to his Instagram account, including one in which he dances around with a sword, and  
another where he takes an "oath" that he "will never date a Russian woman" or "visit Russia"  
again. He vows that "all people involved directly or indirectly will die," and that some of  
these deaths will be by "cruel and painful ways." *See* Orders to Show Cause dated July 25,  
2018.
- He recorded several disturbing videos in July, including some depicting weapons, naked  
women, and himself in various hotel rooms. These were sent to Ms. Fedoseeva and Ms.  
Sulkess, and also posted to his Instagram account. When they were sent to Ms. Fedoseeva and  
Ms. Sulkess, he included texts like "enjoy!" and "talk to me!" *See* Orders to Show Cause  
dated July 25, 2018.
- On July 19, 2018, Mr. Grishin sent Ms. Fedoseeva and Ms. Sulkess a video of himself dancing  
alone in a hotel room while once again kissing a samurai-style sword. In the video, Mr.  
Grishin also focuses in on quantities of money, sexual toys and aids, and zooms in  
continuously on three photos taped to his television set which depict Putin, Stalin, and Mao  
respectively. This was also posted publicly to his Instagram account. *See* Orders to Show



1 Cause dated July 25, 2018.

2 All of the above were messages sent directly to Ms. Fedoseeva or Ms. Sulkess (or both).  
3 Regardless of his Instagram usage, Mr. Grishin is engaged in direct, almost gleeful violation of the  
4 Temporary Restraining Orders. He seems to delight in sending horrifying messages to Ms. Fedoseeva  
5 and Ms. Sulkess, day after day. The Court must act immediately to preserve their sanity and  
6 emotional well-being.

7  
8 **V. MR. GRISHIN USES SOCIAL MEDIA TO THREATEN, HARASS, EMBARRASS,**  
9 **AND HARM MS. FEDOSEEVA AND MS. SULKESS**

10 Mr. Grishin focuses on his social media usage, arguing that his posts are rather innocuous and  
11 that the posts featuring pictures of Ms. Fedoseeva and Ms. Sulkess have been taken down. This is a  
12 vast understatement of his actions. For months, Mr. Grishin has used social media to stalk, threaten,  
13 and harass Ms. Fedoseeva and Ms. Sulkess.

14 First, he set up accounts in their names, including @annaandjen12productions,  
15 @annaandjen12, and @love.and.treason12, each of which included private, personal pictures of Ms.  
16 Sulkess and Ms. Fedoseeva, used without their consent. *See* Sulkess Decl. at ¶¶ 13-14, Ex. J-K.

17 Then, he began using his Instagram account to post videos which facially have nothing to do  
18 with Ms. Fedoseeva and Ms. Sulkess. These include a video of himself with two women dancing in  
19 their underwear, a video of himself clearly intoxicated and showing the camera explicit images sent to  
20 him by a woman named “Rianna,” and a video of himself in a hotel room, focusing in on large  
21 quantities of money, sex toys and aids, and photos of Putin, Stalin, and Mao. *See, e.g.,* Orders to  
22 Show Cause dated July 25, 2018. However, Mr. Grishin also *sent these videos directly to Ms.*  
23 *Fedoseeva and Ms. Sulkess*, in addition to posting them on Instagram. It is clear that they were  
24 directed at Ms. Fedoseeva and Ms. Sulkess from the beginning, even if they did not include photos of  
25 them or explicit references to them.

26 Then, on July 20, Mr. Grishin posted several images to his Instagram account which directly  
27 depicted Ms. Fedoseeva and Ms. Sulkess. Mr. Grishin posted a series of several pictures of Ms.  
28 Fedoseeva and Ms. Sulkess with the caption “Friendship is the most important thing in life! My wife

1 Anna Fedoseeva and her friend Jennifer Sulkess [heart emoji] fuck u in the ass with cactus! Yes!  
2 [thumbs up emoji] [heart emoji] [heart emoji].” *See* Orders to Show Cause dated July 25, 2018; *see*  
3 *also* Orders to Show Cause dated August 28, 2018, filed concurrently herewith. He also posted a  
4 video of Ms. Fedoseeva driving a car with the caption “Anna Fedoseeva! Still loving you [heart  
5 emoji] [heart emoji] [heart emoji] fucking bitch! I hope u will die this year! [heart emoji] [hand  
6 emoji].” *Id.* Lastly, he posted a video of Ms. Fedoseeva giving a toast with several business  
7 associates, with the caption “Twelve Productions is the company Anna Fedoseeva, my wife, owned  
8 and financed by me. The toast by Brian Carpenter, Mississippi Film Group producer... everyone u  
9 see.. will die soon. Just because.” *Id.*

10 These images remained on Mr. Grishin’s Instagram account from July 20 to August 6, 2018.  
11 *Id.*

12 As a direct result of these horrifying posts, on August 2, 2018, this Court ordered Mr. Grishin  
13 to suspend all of his personal Instagram accounts and other social media accounts, including a specific  
14 direction to delete his primary personal account, @sergeygrishinlife. However, from August 2 to  
15 August 7, all of Mr. Grishin’s social media accounts were still active, in violation of the August 2,  
16 2018 Order. *See* Orders to Show Cause dated August 28, 2018.

17 Then, on August 7, 2018, Mr. Grishin changed his Instagram account name from  
18 @sergeygrishinlife to @sgrussamurai, in a clear attempt to evade the Court’s August 2, 2018 Order,  
19 which only specified that the @sergeygrishinlife account was to be deactivated. *Id.*

20 Mr. Grishin did eventually deactivate the @sgrussamurai account name, as is stated in the  
21 Consolidated Opposition – *for about 48 hours*. It was deactivated on August 9, and then back up  
22 again on August 11. *Id.*

23 While the account was back up, he made several references to Ms. Fedoseeva. Attached as  
24 Exhibits to the Order to Show Cause dated August 28, 2018 are two videos – one in which Mr.  
25 Grishin films his friend saying “[w]here’s the fucking AF?” (Ms. Fedoseeva’s initials), and one in  
26 which Mr. Grishin laughs while saying “I won’t send anything to Instagram... she’s prohibited me  
27 from using Instagram.” Mr. Grishin was not only using Instagram in violation of this Court’s explicit  
28 Order, he was also using it to harass and embarrass Ms. Fedoseeva.

1 In fact, he was actively using this account (on a daily basis, if not multiple times per day) up to  
2 August 22, 2018, the date when his Oppositions to Ms. Fedoseeva's and Ms. Sulkess' Orders to Show  
3 Cause were due. In a not-at-all-shocking coincidence, his account happened to be shut down the  
4 morning that his Consolidated Opposition was filed, obviously so that Mr. Grishin and his lawyers  
5 could tell the Court that the account was shut down. *Id.*

6 Mr. Grishin has flouted this Court's authority at every opportunity. When instructed to shut  
7 down his prized social media account, he changed the name (as if no one would notice that the same  
8 account was still in use), and then shut it down for just 48 hours before reactivating the account.  
9 Then, he *conveniently* shut it down the morning that he had to file a document with the Court  
10 pretending to be apologetic and asking for mercy. Then, in his opposition brief, he pretends as if he  
11 has been in saintly abstention since the entry of the Court's Order.

12 It is clear that Mr. Grishin is putting on a show for the Court. If he is not punished – severely  
13 – for his repeated violations of the Court's Orders, he will simply continue to operate as usual, without  
14 regard for the rule of law. He believes that the rules do not apply to him, and nothing this Court has  
15 done so far has disabused him of this belief. The Court must not allow Mr. Grishin to completely  
16 evade responsibility for his actions.

17  
18 **VI. THE TWELVE PRODUCTIONS BREACH OF CONTRACT LAWSUIT IS**  
19 **COMPLETELY BESIDE THE POINT**

20 The Consolidated Opposition discusses at length Mr. Grishin's claims in the *Grishin v. Twelve*  
21 *Productions, Ltd.* lawsuit. He seems to believe that a simple breach of contract lawsuit is a sufficient  
22 basis to justify assaulting Ms. Fedoseeva and threatening Ms. Fedoseeva and Ms. Sulkess.

23 The *Twelve Productions* lawsuit is entirely baseless. It is jurisdictionally improper, and is  
24 based entirely on Mr. Grishin's recollection of an alleged oral agreement with Ms. Fedoseeva. Mr.  
25 Grishin's credibility is the only evidence he has in that case, and it is obvious to everyone who reads  
26 the messages discussed herein what Mr. Grishin's credibility is worth. The *Twelve Productions*  
27 lawsuit was concocted out of whole cloth, and even if it survives the impending jurisdictional  
28 challenge, it will not survive summary judgment.



1 But, crucially, it is also completely irrelevant to the issues before this Court. Even if Mr.  
2 Grishin was right in his breach of contract claim (which he certainly is not), the proper place for  
3 adjudication of those claims is in the *Twelve Productions* lawsuit. This Court is not the place to bring  
4 up these imagined grudges. The *Twelve Productions* lawsuit is wholly irrelevant here and should be  
5 disregarded in its entirety.

6  
7 **VII. MR. GRISHIN'S MENTAL STATE IS GREATLY EXAGGERATED BUT, IF TRUE,**  
8 **IS EVEN MORE REASON TO ISSUE PERMANENT RESTRAINING ORDERS IN**  
9 **FAVOR OF MS. FEDOSEEVA AND MS. SULKESS**

10 Mr. Grishin's mental state is clearly being exaggerated in the Consolidated Opposition.  
11 Despite the hysteric nature of the Opposition and the declarations supporting it, Mr. Grishin and his  
12 counsel have been evasive and withholding regarding Mr. Grishin's mental status. Ms. Fedoseeva and  
13 Ms. Sulless have repeatedly asked for records regarding Mr. Grishin's stay at UCLA. They have  
14 made polite requests via counsel, which were wholly rejected. They were then forced to issue a  
15 subpoena to UCLA and serve Notices to Appear on Mr. Grishin, seeking all of his medical records.  
16 So far, no records have been produced.

17 The only basis for Mr. Grishin's claim of being held on a "5150 hold" is a poor quality cell  
18 phone photograph of some admission paperwork, and bald statement that the 5150 hold was extended  
19 for 14 days. This is far from enough to establish his mental state by a preponderance of the evidence.

20 Further, Mr. Grishin's lawyer's testimony regarding his mental health status should be  
21 disregarded in its entirety. David Berke, Mr. Grishin's counsel, states in his declaration at ¶ 4 that  
22 "Mr. Grishin, who had been relatively available and amenable to assisting me with various aspects of  
23 his case, had suddenly withdrawn completely, and I was unable to see him or speak with him for days  
24 before the [July 25] hearing." He then states at ¶ 5 that he met his client outside of the courtroom on  
25 the morning of July 25. This story is a blatant falsehood. Mr. Grishin's own Instagram account puts  
26 the lie to his lawyer's statements.

27 In fact, Mr. Berke was with Mr. Grishin in the days ahead of the July 25 hearing, in Dubai. On  
28 Friday, July 20, Mr. Grishin posted two videos to his Instagram account depicting Mr. Berke at a

1 Rolex store in Dubai. They show Mr. Berke trying on a new Rolex watch, and Mr. Grishin buying it  
2 for him. *See* Declaration of Jennifer Sulkess in Support of Consolidated Reply, filed concurrently  
3 herewith, at ¶ 2.

4 The pair also enjoyed a nice dinner in Dubai. On 23, 2018, Mr. Berke posted a photo of a  
5 glittering skyline to his personal Twitter account, @berkeslaw. In the caption of the photo, he states  
6 that he “[j]ust got back from a three day zip trip to Dubai. Here’s dinner at 123 floors up.” *Id.* at ¶ 3.

7 That same weekend, while enjoying watch shopping and fancy dinners with his counsel, Mr.  
8 Grishin posted the photos of Ms. Fedoseeva and Ms. Sulkess to Instagram with the caption “fuck u in  
9 the ass with cactus!”

10 Mr. Berke’s testimony regarding his client’s mental health status is entitled to absolutely no  
11 weight. He was a witness to Mr. Grishin’s despicable behavior, and did nothing to stop it. His  
12 judgment regarding his client’s actions is seriously flawed.

13 In sum, Ms. Fedoseeva and Ms. Sulkess have repeatedly asked Mr. Grishin for information  
14 relating to his mental state and have been rejected at every turn. Without any further information  
15 about the reason for the 5150 hold, the length of his stay at UCLA, and actual information about his  
16 mental health from a health care professional, Ms. Fedoseeva and Ms. Sulkess ask the Court to  
17 disregard Mr. Grishin’s mental health status entirely, and focus instead on his actions and words.

18 However, if Mr. Grishin is truly suffering some sort of mental break, that is even more reason  
19 that the Restraining Orders will be absolutely essential to Ms. Fedoseeva’s and Ms. Sulkess’ mental  
20 and physical well-being. If Mr. Grishin is mentally unwell and may “snap” at any time with the  
21 slightest provocation, their lives are at risk. He has already attacked Ms. Fedoseeva – there is no  
22 telling what he will do now that she has reported him to the authorities and sought a restraining order.  
23 If his mental status is as bad as he claims, the Restraining Orders are absolutely essential to Ms.  
24 Fedoseeva’s and Ms. Sulkess’ protection.

25 ///

26 ///

27 ///

28 ///

**VIII. MS. FEDOSEEVA AND MS. SULKESS HAVE BEEN LIVING IN FEAR OF MR. GRISHIN FOR MONTHS**

Mr. Grishin focuses on his own mental status in an attempt to make himself the victim here – he is not. Ms. Fedoseeva and Ms. Sulkess have endured months of harassment and abuse by Mr. Grishin.

In particular, Ms. Fedoseeva and Ms. Sulkess are extremely worried about Mr. Grishin's continued use of dangerous weapons, despite the clear directive in the Temporary Restraining Order that he may not possess firearms. Just recently, Mr. Grishin posted photos to his Instagram account showing himself shooting high-powered assault rifles at targets, as well as showing off knives and other cutting-type weapons. *See* Orders to Show Cause dated July 25, 2018 and August 28, 2018. Mr. Grishin is in possession of a large arsenal and is sending a message to Ms. Fedoseeva and Ms. Sulkess that they are not safe from him.

Mr. Grishin has also undertaken a campaign of stalking Ms. Fedoseeva. He has had her followed on multiple occasions, and just recently Ms. Fedoseeva found three men planting and retrieving surveillance devices outside of her home. *See* Order to Show Cause dated July 25, 2018 and August 28, 2018. Security footage of the men installing and removing the devices is attached to the Order to Show Cause paperwork filed concurrently herewith. Ms. Fedoseeva and Ms. Sulkess have been forced to hire private security to ensure their physical safety.

Their mental safety has no protector, however. Day after day, they have been inundated with graphic messages depicting Mr. Grishin having sex with other women and direct threats to their lives (including specific plans on how he will murder them). They have both been forced to leave their homes at times for fear that he will come knocking at their door with an assault rifle. Every time they step outside, they have to wonder if this is the time that Mr. Grishin will come and attack them. Every time they return home, they check their closets and bathrooms to make sure that no one is waiting in secret for them. Every time they drive their cars, they check to see if they are being followed. They are terrified to come to Court and see Mr. Grishin in person, given his past behavior.

Ms. Fedoseeva and Ms. Sulkess have attempted to keep this trauma as quiet as possible, but Mr. Grishin's continued use of social media has been a huge blow to both of their reputations and

1 business prospects. Both Ms. Fedoseeva and Ms. Sulkess have mutual friends and business contacts  
2 in common with Mr. Grishin, and in today's world, those relationships are often conducted via social  
3 media. In particular, Ms. Fedoseeva and Ms. Sulkess are both in the film industry, where reputation is  
4 everything and a good, non-controversial public image is absolutely essential to a successful business.  
5 The disastrous impact of a statement like "fuck u in the ass with cactus," posted publicly and  
6 disseminated to Ms. Fedoseeva's and Ms. Sulkess' friends and business contacts is obvious. Ms.  
7 Fedoseeva and Ms. Sulkess have already lost work as a result of Mr. Grishin's conduct, and will  
8 continue to lose work the longer this goes on. Their economic harm continues to mount.

9 Further, Ms. Fedoseeva and Ms. Sulkess have nearly bankrupted themselves seeking the  
10 Temporary Restraining Orders and Orders to Show Cause. Mr. Grishin's financial position is  
11 immeasurably stronger than Ms. Fedoseeva and Ms. Sulkess, and he is using it to his advantage. They  
12 have been forced to expend extraordinary costs in dealing with this situation, while Mr. Grishin has  
13 suffered no economic harm whatsoever.

14 Ms. Fedoseeva and Ms. Sulkess plead with this Court to stop the abuse that they have suffered,  
15 and to try to make them whole again. They hope and pray that, after September 5, they can move on  
16 with their lives and once again focus on their careers and private lives. That is impossible without this  
17 Court's intervention.

18  
19 **IX. THE COURT SHOULD ISSUE ORDERS AGAINST MR. GRISHIN FOR VIOLATION**  
20 **OF THE TEMPORARY RESTRAINING ORDERS**

21 Mr. Grishin is separately liable for each separate violation of the Temporary Restraining  
22 Orders. "Where separate contemptuous acts are committed, the contemner can be fined for each  
23 offense in the amount authorized by the code." *Donovan v. Superior Court of L.A. Cty.*, 39 Cal. 2d  
24 848, 855 (1952). In *Donovan*, the contemnners argued that they were guilty of "a single course of  
25 conduct" consisting of renting out multiple apartments in their home after being ordered to remove the  
26 apartments and convert the building back to a single-family dwelling. The court held:

27 [T]he trial court could properly consider the several acts of the petitioners -- in  
28 renting apartments to persons other than members of their own family, in  
failing to remove apartments from the main structure and to reconvert the same

1 to a single-family dwelling, and in failing to remove the apartments from the  
2 garage -- as separate contemptuous acts. Each act, or failure to act, considered  
alone could be the basis for a contempt proceeding.

3 *Donovan*, 9 Cal. 2d at 855; *see also In re Coleman*, 12 Cal. 3d 568, 572 (1974). The court in *In re*  
4 *Stafford* set forth several instances where multiple violations of an order were punished as separate  
5 acts of contempt:

6 Every separate act of disobedience of the injunction was a separate contempt.  
7 (*Golden Gate Consol. H. Min. Co. v. Superior Court*, 65 Cal. 187 [3 P. 628],  
8 discharging mining debris into a stream on three separate occasions in violation  
of an injunction -- three separate contempts; *Ex parte Stice*, 70 Cal. 51 [11 P.  
9 459], refusal to be sworn as a witness in a criminal action on February 27 and  
again on March 1, 1886 -- two separate contempts; *Solano Aquatic Club v.*  
10 *Superior Court*, 165 Cal. 278 [131 P. 874], operating a ferry service on three  
separate days in violation of a temporary restraining order -- three separate  
11 contempts; *Blodgett v. Superior Court*, 210 Cal. 1 [290 P. 293, 72 A.L.R. 482],  
filing a contemptuous affidavit, citation for contempt therefor, sending  
12 scandalous letter to judge before citation heard and producing same in open  
court at contempt hearing -- two separate contempts; *In re Shuler*, 210 Cal. 377  
[292 P. 481], broadcasts on four days -- each broadcast a separate contempt for  
13 which the punishment could run consecutively; *Hume v. Superior Court*, 17  
Cal.2d 506 [110 P.2d 669], filing a complaint in an action on June 5, 1940,  
14 filing amended complaint and an affidavit on June 8, 1940 all in the same  
action -- three separate contempts; *Lindsley v. Superior Court*, 76 Cal.App. 419  
15 [245 P. 212], publication of newspaper articles containing contumacious matter  
on four different days -- each publication a separate contempt.)

16 *In re Stafford*, 160 Cal. App. 2d 110, 113-14 (1958).

17 Thus, each separate violation of the Temporary Restraining Order should be considered an  
18 individual act of contempt of court.

19 Pursuant to Cal. Civ. Proc. Code § 1218, a person is determined to be in contempt of court  
20 must (1) pay the attorney's fees and costs incurred by the victim; and (2) pay a fine and be imprisoned  
21 for up to five days:

22 [I]f it be adjudged that he or she is guilty of the contempt, a fine may be  
23 imposed on him or her not exceeding one thousand dollars (\$1,000), payable to  
the court, or he or she may be imprisoned not exceeding five days, or both. In  
24 addition, a person who is subject to a court order as a party to the action, or any  
agent of this person, who is adjudged guilty of contempt for violating that court  
25 order may be ordered to pay to the party initiating the contempt proceeding the  
reasonable attorney's fees and costs incurred by this party in connection with  
26 the contempt proceeding.

27 Cal. Civ. Proc. Code § 1218(a).

28 Because each one of the Orders to Show Cause on file contains multiple violations -- some  
{2481137.DOCX;}



1 contain dozens of separate messages from Mr. Grishin – Ms. Fedoseeva and Ms. Sulkess would be  
2 well within their rights to seek the full \$1,000 fine and a full 5 days imprisonment per message. If so,  
3 it is likely that the Court could issue fines in excess of \$100,000 and 500 days imprisonment.

4 Section 1218 further provides that, if any person is found to be in violation of any Order issued  
5 pursuant to the Family Code (which includes the Domestic Violence Prevention Act, commencing at  
6 Cal. Fam. Code §§ 6200, *et seq.*) *shall* be punished as follows:

7 (1) Upon a first finding of contempt, the court shall order the contemner to  
8 perform community service of up to 120 hours, or to be imprisoned up to 120  
9 hours, for each count of contempt.

10 (2) Upon the second finding of contempt, the court shall order the contemner to  
11 perform community service of up to 120 hours, in addition to ordering  
12 imprisonment of the contemner up to 120 hours, for each count of contempt.

13 (3) Upon the third or any subsequent finding of contempt, the court shall order  
14 both of the following:

15 (A) The court shall order the contemner to serve a term of  
16 imprisonment of up to 240 hours, and to perform community service of  
17 up to 240 hours, for each count of contempt

18 (B) The court shall order the contemner to pay an administrative fee,  
19 not to exceed the actual cost of the contemner's administration and  
20 supervision, while assigned to a community service program pursuant  
21 to this paragraph.

22 Cal. Civ. Proc. Code § 1218(c).

23 Thus, because Mr. Grishin has violated the Temporary Domestic Violence Restraining Order  
24 put in place to protect Ms. Fedoseeva, and because Section 1218(c)'s language is mandatory (using  
25 the term *shall*, in comparison to Section 1218(a)'s permissive *may* language) he must also be ordered  
26 to perform the community service specified under Section 1218(c), as well as the term of  
27 imprisonment set forth therein, as to each violation of the Temporary Domestic Violence Restraining  
28 Order.

29 However, Ms. Fedoseeva and Ms. Sulkess have no wish to gratuitously punish Mr. Grishin.  
30 They believe that a strong, but measured, Order should be entered against Mr. Grishin. Ms.  
31 Fedoseeva and Ms. Sulkess therefore recommend that an Order be entered against Mr. Grishin,  
32 comprised of at least the following terms:

1           1.       Mr. Grishin be Ordered to pay all of Ms. Fedoseeva's and Ms. Sulkess' attorney's fees  
2 and costs related to each of their Restraining Orders, Ms. Fedoseeva's Response to Mr. Grishin's  
3 Request for Domestic Violence Restraining Order, and each of the eleven Orders to Show Cause on  
4 file herein – as set forth in the Declarations of Jessica R. Corpuz filed concurrently herewith – within  
5 10 days of the date of the Hearing, pursuant to Section 1218(a);

6           2.       Mr. Grishin be Ordered to pay \$5,000 in fines to the Court – \$1,000 for each Order to  
7 Show Cause filed by Ms. Sulkess (despite the fact that each Order to Show Cause contains multiple  
8 violations) – within 10 days of the date of the Hearing, pursuant to Section 1218(a);

9           3.       Mr. Grishin be imprisoned for 25 days – five days for each Order to Show Cause filed  
10 by Ms. Sulkess (again, despite the fact that each Order to Show Cause contains multiple violations),  
11 pursuant to Section 1218(a);

12          4.       Mr. Grishin be ordered to perform 1,200 hours of community service – 120 hours for  
13 the first Order to Show Cause filed by Ms. Fedoseeva, 120 hours for the second Order to Show Cause,  
14 and 240 hours for each subsequent Order to Show Cause (again, despite the fact that each Order to  
15 Show Cause contains multiple violations), pursuant to Section 1218(c);

16          5.       Mr. Grishin be ordered to 1,200 hours imprisonment – 120 hours for the first Order to  
17 Show Cause filed by Ms. Fedoseeva, 120 hours for the second Order to Show Cause, and 240 hours  
18 for each subsequent Order to Show Cause (again, despite the fact that each Order to Show Cause  
19 contains multiple violations), pursuant to Section 1218(c); and

20          6.       Mr. Grishin be ordered to pay an administrative fee, pursuant to Section  
21 1218(c)(3)(B).<sup>1</sup>

22               Ms. Fedoseeva and Ms. Sulkess do not seek “vengeance” – they simply seek to be made whole  
23 and to be protected from further violations. Mr. Grishin's actions have cost them an enormous  
24

25 <sup>1</sup> Mr. Grishin argues that he cannot be found in contempt by this Court, because only a Judge may  
26 exercise civil contempt power, citing *Nierenberg v. Superior Court*, 59 Cal. App. 3d 611 (1976).  
27 *Nierenberg* actually holds that a Commissioner sitting as a judge pro tempore may not adjudicate and  
28 punish a party for contempt *absent stipulation of the parties*. *Id.* at 615-16. Here, both sides have  
stipulated to the power of the sitting judge pro tempore to adjudicate Orders to Show Cause in the  
past, and there is no reason that the parties cannot so stipulate in the future.



1 amount of money in the form of attorney's fees and costs. In addition to routine Court costs, Ms.  
2 Fedoseeva and Ms. Sulkess have been forced to incur costs for things like translation of documents (so  
3 that an American Court can understand the vicious messages sent by Mr. Grishin), travel from Russia  
4 to Los Angeles to appear at hearings, and private security (because they are in fear of their lives).

5 Further, they seek punishment in the form of monetary penalties and imprisonment, not just  
6 because of Mr. Grishin's past actions, but because of the certainty that Mr. Grishin will continue to  
7 violate this Court's Orders unless substantial penalties are issued. So far, Mr. Grishin has operated  
8 outside of the law. The rules do not apply to him, and he is beyond reproach by this Court. He openly  
9 flaunts the Court's authority while violating its Orders. This will continue unabated unless the Court  
10 demonstrates its power to Mr. Grishin. Without a strong statement by the Court that his conduct is  
11 illegal, he will simply continue and Ms. Fedoseeva and Ms. Sulkess will be in fear of their lives. Only  
12 a strong message from this Court will show Mr. Grishin that there are repercussions for his actions.

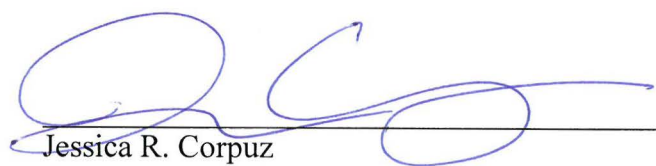
13  
14 **X. CONCLUSION**

15 For the reasons stated above, the Court should issue a Domestic Violence Restraining Order  
16 After Hearing and a Civil Harassment Restraining Order After Hearing, protecting Ms. Fedoseeva and  
17 Ms. Sulkess to the full extent permitted. Their physical safety and emotional wellbeing are at stake  
18 here, and Ms. Fedoseeva and Ms. Sulkess respectfully request that the Court take the necessary steps  
19 to protect their lives and sanity. Further, Ms. Fedoseeva and Ms. Sulkess respectfully request that this  
20 Court issue Orders against Mr. Grishin for his violation of the Temporary Restraining Orders, as  
21 outlined above.

22  
23 DATED: August 28, 2018

JESSICA R. CORPUZ

**WEINTRAUB TOBIN CHEDIAK COLEMAN  
GRODIN LAW CORPORATION**

24  
25  
26  
27   
28

Jessica R. Corpuz

Attorneys for Petitioner Anna Fedoseeva

**PROOF OF SERVICE**

*Fedoseeva v. Grishin*  
Case No. 18STR004283

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 10250 Constellation Boulevard, Suite 2900, Los Angeles, CA 90067.

On August 28, 2018, I served true copies of the following document(s) described as **ANNA FEDOSEEVA'S REPLY IN SUPPORT OF REQUEST FOR DOMESTIC VIOLENCE RESTRAINING ORDER** on the interested parties in this action as follows:

David L. Berke, Esq.  
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Attorneys for Respondent *Sergey Grishin*

☐ **BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with the practice of Weintraub Tobin Chediak Coleman Grodin Law Corporation for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope was placed in the mail at Los Angeles, California.

☒ **(BY FEDERAL EXPRESS OVERNIGHT MAIL)** I served the foregoing document by Federal Express, an express service carrier which provides overnight delivery, as follows: I placed true copies of the foregoing document in sealed envelopes or packages designated by the express service carrier, addressed to each interested party as set forth on the Service List attached, with fees for overnight delivery paid or provided for.

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

Executed on August 28, 2018, at Los Angeles, California.

  
Denise Thurman