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7 Attorneys for Defendants and Cross-complainants,
TWELVE PRODUCTIONS, LTD.,
8 ANNA FEDOSEEVA, JENNIFER SULKESS

9
10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT
12

13 SERGEY GRISHIN, an individual, and SG
14 Acquisitions, LLC, a Delaware limited
15 liability company,

16 Plaintiffs,

17 vs.

18 TWELVE PRODUCTIONS, LTD., a
19 California corporation; ANNA
FEDOSEEVA, an individual; JENNIFER
SULKESS, an individual,

20 Defendants
21

22 ANNA FEDOSEEVA, an individual;
23 JENNIFER SULKESS, an individual,

24 Cross-complainants,

25 vs.

26 SERGEY GRISHIN, an individual; ROES 1
27 through 20,

28 Cross-defendants.

Case No. BC708104

(Assigned for all purposes to Dennis J. Landin,
Dept. 51)

SECOND AMENDED CROSS-COMPLAINT
for:

1. Cyberstalking in violation of Civil Code §646.9;
2. Intentional Infliction of Emotional Distress;
3. Invasion of Privacy;
4. Domestic Violence in violation of Civil Code §1708.6;
5. Assault;
6. Battery;
7. Civil Extortion.

1 Cross-complainants, ANNA FEDOSEEVA (“Fedoseeva”) and JENNIFER SULKESS
2 (“Sulkess”) hereby allege as follows:

3 **SUMMARY OF CASE**

4 1. This action involves the attempts by enraged billionaire Sergey Grishin
5 (“Grishin”) to destroy his estranged wife Fedoseeva, her friend and business partner Sulkess,
6 and their company, Twelve Productions, Ltd. (“Twelve Productions”).

7 2. After Grishin’s marriage to Fedoseeva deteriorated, Grishin commenced a
8 campaign of terror against Fedoseeva and Sulkess, which included the following:

9 a. He sent numerous death threats, violent images, and pornographic images
10 to them in text and video messages;

11 b. He attempted to kill Fedoseeva, pointed a gun with a silencer at her head,
12 and forced her to strip at gun point;

13 c. He head-butted Fedoseeva, breaking several of her teeth, and causing her
14 other injuries;

15 d. He tried to hire a hit-man to take care of his list of 16 people;

16 e. He made a false police report, which resulted in Fedoseeva’s arrest and
17 imprisonment for ten days, before the authorities found out that the charges were false and
18 dismissed them and released her.

19 3. Grishin also hacked into Fedoseeva’s computer, and published private selfie
20 photos of her and Sulkess on the internet.

21 4. He also demanded that the crew on a film Fedoseeva and Sulkess were producing
22 cease work on the project and attempted to bribe crew members to quit the film.

23 5. In the process of terrorizing Fedoseeva and Sulkess, Grishin repeatedly violated
24 three restraining orders issued by the Los Angeles Superior Court, including orders (a)
25 prohibiting him from contacting Fedoseeva or Sulkess, (b) requiring him to relinquish his
26 weapons, and (c) directing him to stop using his Instagram account, @sergeygrishin, which he
27 used to disseminate private photos and make threats.
28

THE PARTIES

6. Cross-complainant Fedoseeva is an individual, currently a resident of Moscow, Russia, and an officer, director and owner of Twelve Productions.

7. Cross-complainant Sulkess is an individual, a resident of Los Angeles County, California, and an officer, director and owner of Twelve Productions.

8. On information and belief, Cross-defendant Grishin is an individual and, at all relevant times, was a resident of Los Angeles County, California

9. The true names and capacities, whether individual, corporate, associate or otherwise, of the defendants named as Roes 1 through 20, inclusive, are unknown to plaintiffs, and plaintiffs sue said defendants by such fictitious names. Cross-complainant s will seek leave to amend this Cross-complaint to identify the true names and capacities of the fictitiously-named defendants when they have been ascertained. Cross-complainant s are informed and believe and thereon allege that each of the defendants named herein as a Roe is legally responsible in some manner for the acts, omissions and events referred to herein and proximately caused the injuries and damages alleged.

10. Cross-complainants are informed and believe and thereon allege that at all times herein mentioned, each of the cross-defendants was and now is the agent, servant, employee or representative of at least one of the other defendants and, in doing the things alleged herein, was acting within the scope of his, her or its authority as such.

SUMMARY OF FACTS

A. Background Of The Parties

11. Grishin is a billionaire who made his money by owning a Russian bank. In a recent "selfie video" confessional, he takes credit for the scheme whereby a group of banks allegedly stole \$60 billion from the Russian Central Bank during the free-for-all of the Yeltsin era. He is a U.S. Green Card holder who relocated from Russia to California more than a decade ago. At all relevant times, he maintained his primary U.S. residence in the penthouse apartment of "The Century" residential tower in Century City, Los Angeles, California.

12. Fedoseeva has a college degree and worked for many years in the event planning

1 business in Moscow, Russia, before she started dating Grishin in August 2015.

2 13. In March 2017, Grishin and Fedoseeva married after a two-year courtship. This
3 was Grishin's third marriage. Shortly after their marriage, they relocated from Moscow to
4 Grishin's Century City residence.

5 14. Fedoseeva found herself alone for much of her marriage to Grishin, especially in
6 Los Angeles, as he was preoccupied with business and travel. She met Sulkess in Los Angeles
7 and they became friends. In July 2017, they formed Twelve Productions to produce a low-
8 budget feature film which Fedoseeva agreed to fund with her own money.

9 15. Sulkess is a 30-year old, currently unemployed, single woman living in Los
10 Angeles. She volunteered and worked at a dog rescue in New Orleans, has worked as an
11 executive assistant to an actress/film producer, and most recently as the co-executive producer
12 of a low-budget feature film which Fedoseeva financed.

13 **B. Grishin's Marriage Crumbles And He Starts Making Violent Threats**

14 16. In January 2018, Fedoseeva's marriage to Grishin was under severe strain. She
15 had devoted substantial time to producing her movie, was about to travel to Mississippi for
16 filming, and was not at his beck and call.

17 17. At some point in January, Grishin gained unauthorized access to Fedoseeva's
18 password-protected computer and downloaded photos taken during the film production,
19 including innocent selfies of Fedoseeva and Sulkess. Grishin became insane with jealousy over
20 their friendship, and in a fit of rage, filed for divorce on February 26, 2018.

21 18. Grishin then started threatening Fedoseeva both orally and in writing in a
22 misguided effort to coerce her to stay in the marriage, and demanded that she stop work on the
23 film project and cease all communication with Sulkess. He embarked on a campaign to destroy
24 Twelve Productions and prevent Sulkess from associating with Fedoseeva.

25 19. On February 27, 2018, he texted Fedoseeva that he would "*destroy everything*
26 *that matters to you. All of it.*" Grishin reiterated that Fedoseeva should take his threats "*VERY*
27 *seriously,*" and that he is "*extremely dangerous.*" His message also threatens that he has the
28 ability to destroy Fedoseeva and Sulkess because of his vast wealth: "*Are you familiar with the*

1 *concept of operation without a budget? This is the worst thing that can happen to a person*
2 *opposed by a clever, inventive, insidious enemy. It's not my choice, you got me there. Enjoy it."*

3 20. On February 28, 2018, Grishin emailed Sulkess and other employees of Twelve
4 Productions and demanded that they quit the production within 12 hours and send him written
5 confirmation and photos as proof that they had done so.

6 21. On February 28, 2018, Grishin sent Fedoseeva a text message warning that "*You*
7 *remember one thing -- all your life and the lives of all your loved ones are at stake now.*"

8 22. On March 1, 2018, Grishin sent Fedoseeva a text message demanding that she
9 "*fall on [her] knees*" and "*beg his forgiveness*" and obey him in order to reunite with him. He
10 also wrote that "*In two week at most, I will know everything about Jennifer. You do not protect*
11 *her in any way.*"

12 23. On March 1, 2018, Grishin sent an email to Sulkess stating that he has had an
13 "unpleasant relationship" with her and demanding that she leave Twelve Productions and have
14 no further contact with Fedoseeva. He says that he will sue Twelve Productions and get a "very
15 quick judgment" and that he has a "*95% chance of winning*" and *will seek her personal assets in*
16 *the bankruptcy of Twelve Productions*. That same day, he sent another email to Sulkess that she
17 "have to send [him] by email written confirmation that you understood everything and agree
18 with everything... It is enough."

19 24. On March 3, 2018, Grishin sent a text message to Fedoseeva that he is a "*killing*
20 *machine*" and that she can stop everything with her love.

21 25. On March 12, 2018 in a desperate attempt to keep Grishin calm and stop him
22 from making more threats, Fedoseeva sent Sulkess an email, which was copied to a few crew
23 members and bcc'd to Grishin, "releasing" Sulkess from her position on the film. Fedoseeva
24 informed Sulkess and the crew that was doing this in an attempt to keep Grishin away from
25 everyone.

26 26. On March 27, 2018, Grishin sent an ominous email to Sulkess stating that he is
27 her "*best friend*" and that sometimes "*friends*" can be "*cruel, merciless, smart devils who can*
28 *wait for many years.*" He says that he is "*taking this extremely personally. It is a very bad*

1 *insult, it is a spit in my face.”* He also says that her failure to respond to his emails is “another
2 spit.”

3 27. On March 29, 2018, Grishin sent a chilling email to Sulkess claiming that he was
4 a “Russian billionaire” with “zero” enemies and informing her that he had done a complete
5 background check on her and knew her recent addresses, property ownership, vehicle records,
6 and more.

7 **C. Grishin Is Calm For A Brief Time Before His Violent Threats Escalate**

8 28. Over the next few weeks, Fedoseeva was able to keep Grishin calm long enough
9 to let the crew finish working on the film. However, in late April, Grishin’s threats started to
10 commence again.

11 29. On April 29, 2018, he sent Fedoseeva a text message warning that his first ex-
12 wife was in an insane asylum “4 times” after their divorce.

13 30. On May 10, 2018, Grishin sent several text message to Fedoseeva stating that
14 *“Everything I have ever given you, including money and payments under the prenuptial*
15 *contract, you will have to return it. The last date of the refund is June 1. All watches, jewelry,*
16 *car – everything.”* He also wrote, *“Yeah... I'd be terrified if I were you. Unreal. Fear of the*
17 *inevitability of what will happen should paralyze your power to suck out the energy...”*

18 31. On May 12, 2018, Grishin texted Fedoseeva that he has a “Glock” gun with a
19 “15-round clip,” “13 for you [and] 2 in any case for me.” He described in excruciating detail
20 how he had meticulously thought out how he would kill her publicly:

21 *But imagine how beautiful it would be – a crowd of people, cameras, you at the*
22 *point of a pistol. Everything broadcast [sic] live on YouTube and Instagram*
23 *and my website. I deliver a well-prepared speech, an accusatory one, and*
24 *explain why I made the decision. Everything happens at the Four Seasons, on*
25 *the boulevard, in daytime when there's plenty of light. Special bullets so they*
26 *bury you in a closed casket. I end my speech, ask everyone's forgiveness for*
27 *the inconvenience. And I begin... I had it all in my head, down to the details.*

28 32. On June 1, 2018, Grishin gave Fedoseeva instructions on how she should kill
herself, and laid out a plan in which he would follow her in his car, and kill her with a knife in a
secluded place.

33. On June 1, 2018, Grishin sent a text message to Fedoseeva that she is a

1 “poisonous reptile” who “bit [him] but not fatally.” He says, *“I will simply punish you by*
2 *cutting you up piece by piece, from the tail. Until I reach your head. THAT’S WHAT’LL*
3 *HAPPEN.”* He says that her life has “ended” and that there will be “nothing good anymore.”

4 34. On June 1, 2018, Grishin sent a text message to Fedoseeva threatening that he
5 has a detailed plan to follow her in her car, give her a flat tire, and kill her with a knife in an
6 empty place.

7 35. At various times, Fedoseeva expressly and unequivocally requested that Grishin
8 stop his threats.

9 **F. Grishin Attempts To Kill Fedoseeva And Batters Her**

10 36. On June 3, 2018, Grishin told Fedoseeva that he wanted to resolve their
11 differences amicably, and asked that she meet him in his apartment in Moscow, reassuring her
12 that he was no longer angry. While Fedoseeva was initially reluctant, she naively agreed to
13 attend the meeting based on his promises that a third party would be present at all times so she
14 would feel safe, thinking that Grishin had calmed down again (as in April), and would allow the
15 dissolution to proceed, and would stop the threats and harassment.

16 37. Grishin had other plans. When Fedoseeva arrived at his apartment, there was no
17 nobody else present. He pulled out a gun with a silencer and pointed it at her and said that he
18 would kill her. He told her to go to the corner and strip naked. She believed that he would kill
19 her if she did not do what he asked, so she started to take off my pants. He said that he had
20 planned everything and would make it look like she had attacked him with a knife. As he was
21 talking, she grabbed the silencer of the gun and wrestled it to the floor. They began to struggle,
22 and he punched her in the face and body and “head-butted” her. She managed to get to the door
23 of his apartment, but she could not open it and they began struggling again. She was finally
24 able to open the door and run to my nearby apartment and call the police. She made a brief
25 statement to police and then medics then took her to the hospital to treat her injured nose, lip,
26 cracked teeth and finger. The next day, she filed a police report in Moscow.

27 38. On June 4, 2018, Grishin sent a text message to Fedoseeva admitting to breaking
28 her teeth, and stating that a doctor can give her a “new Hollywood smile.”

1 39. On June 6, 2018, Grishin sent a text message to Fedoseeva with a picture of a
2 handgun and stating “*Remind you of anything?*”

3 **G. Grishin Continues With His Violent Threats**

4 40. On June 7, 2018, Grishin sent a text message to Fedoseeva threatening that he is
5 going to ruin everyone’s lives “*by various sophisticated means.*” He also states, “*BEASTS AND*
6 *SCUM, SPAWN OF HELL! Go back to your hell, to your inferno. Burn in eternal fire.*”

7 41. On June 7, 2018, Grishin sent a menacing text message to Fedoseeva: “*I will*
8 *come. Wait in fear. Every day.*” He also mentions Sulkess.

9 42. On June 8, 2018, Grishin sent a text message to Sulkess stating that Anna “*is not*
10 *this pretty any more. Missing some teeth.*” He also said “*this is not joking or acting like a 52*
11 *year old kid. I am not a kid. I am devil much much more. And Russian jail are not good. You*
12 *do not want to mess up business with Russian like me. Not at all. Just a friendly reminder.*”

13 43. On June 11, 2018, Grishin sent a text message to Fedoseeva warning that a
14 “*sentence*” has been issued against Fedoseeva and that “*it will be very awful*” and “*happen to*
15 *everyone too... and to your mother too. You will all be living vegetables. And good luck trying*
16 *to stop me.*”

17 44. On June 17, 2018, he sent Fedoseeva a video with the file name “The Kill.” In
18 the video, Grishin rants for some time in Russian in front of a television showing what appears
19 to be clips of movies depicting torture. He says that he is Lucifer and is going to “get”
20 everyone.

21 45. Sulkess and Fedoseeva were terrified of Grishin’s threats and decided to seek
22 restraining orders against him.

23 **H. Sulkess And Fedoseeva Obtain TROs Against Grishin**

24 46. On June 15, 2018, Grishin filed an application for a Temporary Restraining
25 Order (“TRO”) in the Los Angeles Superior Court, falsely claiming that Fedoseeva was the
26 aggressor in the domestic violence incident where he pointed a gun at her, forced her to strip,
27 and then head-butted her after she wrestled the gun from his possession.

28 47. On June 19, 2018, Sulkess and Fedoseeva each obtained a TRO against Grishin

1 from the Los Angeles Superior Court. The TROs provides that Grishin may not harass,
2 intimidate, threaten, or contact them, whether directly or indirectly, by any means. The TROs
3 also directed Grishin to surrender all of his weapons. On April 24, 2019, Sulkess was granted a
4 permanent restraining order against Grishin after proving by clear and convincing evidence that
5 he was an imminent threat of harm.

6 **I. Grishin Repeatedly And Brazenly Violates The TROs**

7 48. Grishin refused to comply with the restraining orders, and violated them
8 repeatedly and for a prolonged period. A sampling of his violations follows:

9 49. On June 20, 2018, the very day after the TROs were issued, Grishin arranged for
10 one of his business associates to message Sulkess and Fedoseeva a link to an Instagram video of
11 Grishin wielding a large knife and chopping various objects.

12 50. On July 2, 2018, Fedoseeva's mother received a message from Grishin bragging
13 that he wasn't going to comply with the restraining orders: *"And Fedoseeva, I don't care about*
14 *your petition to an American court regarding your labored restraining order. You're a Russian*
15 *citizen, with a registered address in my apartment. You're physically located in Bumfuck Egypt*
16 *with the other cunts. While I'm flying over the Atlantic. But the supreme law of the United*
17 *States, the Constitution, the Law of the Land! So go fuck yourself.... "*

18 51. On July 4, 2018, Grishin began repeatedly texting Fedoseeva's mother, sending
19 pornographic images and videos, and threatening Fedoseeva's life. In one message that date,
20 Grishin attached an audio recording of a conversation where he tries to hire a hit man. In the
21 recording, he speaks of the three personalities inside of him, one of which is Lucifer: *"But*
22 *there's also someone else. This someone is called Lucifer, or Lucifer's assistant, or whatever*
23 *..."* He states that *"Lucifer will find people to assist him"* and that Lucifer will find someone to
24 help him with his hit list which has 16 people on it -- *"there are at least 16 people on that list,*
25 *and it's a million euros per person. He'll find someone. He will. So there you go."* He admits
26 that he *"crossed that line. That's it. I made a decision"* and *"I'll do it, no matter what it takes."*

27 52. On July 16, 2018, Grishin sent Sulkess, Fedoseeva, and Fedoseeva's mother
28 bizarre sexual videos and audio recordings. The videos depicted women dancing in various

1 states of undress, and engaging in sexual activity with one another, and with Grishin. In one of
2 the video recordings, Grishin vows that “*all people involved directly or indirectly will die,*” and
3 that some of these deaths will be by “*cruel and painful ways.*”

4 53. On July 20, 2018, Grishin posted on Instagram “*My wife Anna Fedoseeva and*
5 *her friend Jennifer Sulkess [heart emoji] fuck u in the ass with cactus!,*” and “*Anna Fedoseeva!*
6 *Still loving you [heart emoji] [heart emoji] [heart emoji] fucking bitch! I hope u will die this*
7 *year! [heart emoji] [hand emoji].*”

8 54. On July 20, 2018, Grishin targeted Sulkess, Fedoseeva, and their company
9 Twelve Productions by posting a video on Instagram of Fedoseeva making a toast with several
10 business associates, with the caption “*Twelve Productions is the company Anna Fedoseeva, my*
11 *wife, owned and financed by me. The toast by Brian Carpenter, Mississippi Film Group*
12 *producer... everyone u see.. will die soon. Just because.*” These images remained on Mr.
13 Grishin’s social media accounts from July 20, 2018 to August 6, 2018.

14 **J. Grishin Posts Stolen Images of Fedoseeva and Sulkess**

15 55. At some point, Grishin created the website www.loveandtreason12.com, which
16 states that it is devoted to “the love story of Sergey Grishin to Anna Fedoseeva. And treason,
17 unheard of, that happened in this love. Site about treason of friends, that Sergey new [sic] 30
18 and 15 years. Site about monstrous lies and insincerity.” The website included images that
19 Grishin had taken when he gained unauthorized access to Fedoseeva’s computer, including
20 personal selfie photos of Fedoseeva and Sulkess, as well as Fedoseeva’s private passport and
21 visa information.

22 56. Grishin also set up a series of Instagram accounts to disseminate the stolen
23 photos, which included @love.and.treason12, @annaandjen12productions, and @annaandjen12.
24 This was a follow-up on earlier threats to use his large social media presence to destroy
25 Fedoseeva’s reputation -- on or about May 15, 2018, Grishin had texted Fedoseeva that “at the
26 right moment” he would turn his social media capabilities “into a weapon . . . against you.” He
27 later texted that “the process has begun.” He then detailed a plan to publicly post images of
28 Fedoseeva, asking “[t]ell me what pictures you like,” and noting the 10 million Instagram

1 followers that he and his company Sergey Grishin Enterprises (“SGE”) had at that time. He told
2 Fedoseeva that he would use his social media presence to make her “very very famous.”

3 57. Grishin has acquired Instagram accounts and aggregated their followers into a
4 large social media presence through his company SGE which he claims owns over 100
5 Instagram accounts which have over 300+ million followers.

6 **K. Grishin Violates A Second Set Of TROs Using Social Media**

7 58. On August 2, 2018, the Court entered a further order which required Grishin to
8 suspend all of his personal Instagram accounts and other social media accounts, including a
9 specific direction to delete his primary personal account, @sergeygrishinlife.

10 59. From August 2 to August 7, Grishin’s social media accounts were still active, in
11 violation of the August 2, 2018 Order. During that time, the images of Fedoseeva and Sulkess
12 with Grishin’s graphic and threatening captions remained in public.

13 60. On August 7, 2018, Grishin changed the name of his personal account from
14 @sergeygrishinlife to @sgrussamurai, in an attempt to evade the Court’s August 2, 2018 Order.
15 Grishin then posted two videos to his personal and public Instagram account @sgrussamurai,
16 boasting about violating the Court’s August 2, 2018 Order which “prohibited [him] from using
17 Instagram.”

18 61. Between August 15, 2018 and August 23, 2018, Grishin posted several videos to
19 his personal and public Instagram account @sgrussamurai depicting various weapons, including
20 knives, cutting-type weapons, and assault rifles.

21 **L. Grishin Has Fedoseeva Arrested**

22 62. On May 16, 2018, Grishin sent text messages to Fedoseeva threatening that her
23 “end is a prison” because the police investigators are “his” and that he will “go to the end” with
24 her in a prison “whatever it costs” him. Two days later he threatened that she would be charged
25 of “fraud on a large scale as part of a criminal group.”

26 63. On November 2, 2018, Grishin carried through with his threats to have
27 Fedoseeva arrested and detained in a Russian prison by falsely informing the authorities that she
28 had defrauded him of monies for the film production company *years before* she had even met

1 Sulkess and formed the company. As a result, Fedoseeva was arrested and incarcerated. Ten
2 days after the arrest and jailing, and after completing an investigation into Grishin's false
3 charges, the authorities released Fedoseeva and dismissed the charges against her. On
4 information and belief, the Russian authorities have commenced an inquiry into Grishin's
5 corruption of the detectives who arrested Fedoseeva and the judge who ordered her to prison.

6 **FIRST CAUSE OF ACTION**

7 **(Cyberstalking in Violation of Civil Code §1708.7)**

8 **(By Fedoseeva and Sulkess against Grishin)**

9 64. Cross-complainants reallege and incorporate by reference herein the allegations
10 set forth in Paragraphs 1 through 63 above.

11 65. Grishin engaged in a pattern of conduct which intended to seriously alarm,
12 annoy, torment, harass, and terrorize cross-complainants.

13 66. As a result of such conduct, cross-complainants reasonably feared for their safety
14 and suffered substantial emotional distress pursuant to a pattern of conduct which would have
15 caused a reasonable person to suffer substantial emotional distress.

16 67. Grishin repeatedly made credible threats, and even acted on several of such
17 threats, with the intent of placing cross-complainants in fear for their safety.

18 68. Fedoseeva clearly and definitively demanded that Grishin cease and abate his
19 behavior.

20 69. Cross-complainants each obtained a TRO to prevent further similar conduct.

21 70. Grishin ignored the requests that he cease and abate such behavior and
22 intentionally violated the TROs.

23 71. Cross-complainants have suffered damages in an amount according to proof, but
24 no less than \$75,000,000 for Fedoseeva and \$50,000,000 for Sulkess.

25 72. Cross-complainants are entitled to the imposition of punitive damages because
26 Grishin's conduct was malicious and oppressive.

27 **SECOND CAUSE OF ACTION**

28 **(Intentional Infliction of Emotional Distress)**

(By Fedoseeva and Sulkess against Grishin)

73. Cross-complainants reallege and incorporate by reference herein the allegations set forth in Paragraphs 1 through 63 above.

74. Grishin's conduct was outrageous.

75. Grishin intended to cause cross-complainants emotional distress, or acted with reckless disregard of the probability that cross-complainants would suffer emotional distress.

76. Cross-complainants suffered severe emotional distress, including anxiety, panic attacks, stress, paranoia, mental anguish, shock, fright, anger, night terrors, sleep disturbances, loss of appetite, mood swings, and physical trauma, from Grishin's outrageous conduct. Sulkess has also suffered panic induced seizures.

77. Cross-complainants continue to suffer severe emotional distress, including anxiety, panic attacks, seizures, stress, paranoia, mental anguish, shock, fright, anger, night terrors, sleep disturbances, loss of appetite, mood swings, and physical trauma, from Grishin's outrageous conduct because Grishin remains an *imminent* threat of harm. In Grishin's own words, he is one those "*cruel, merciless, smart devils who can wait for many years.*"

78. Grishin's conduct was a substantial factor in causing the severe emotional distress.

79. Cross-complainants have suffered damages in an amount according to proof, but no less than \$75,000,000 for Fedoseeva and \$50,000,000 for Sulkess.

80. Cross-complainants are entitled to the imposition of punitive damages because Grishin's conduct was malicious and oppressive.

THIRD CAUSE OF ACTION

(Invasion of Privacy)

(By Fedoseeva and Sulkess against Grishin)

81. Cross-complainants reallege and incorporate by reference herein the allegations set forth in Paragraphs 1 through 63 above.

82. Cross-complainants had a reasonable expectation of privacy in their personal

1 property and information.

2 83. Grishin intentionally intruded on cross-complainants' privacy by gaining
3 unauthorized access to Fedoseeva's computer and photographs and personal information which
4 was thereafter posted online in a website Grishin created and linked to Instagram account
5 @sergeygrishin.

6 84. Cross-complainants have suffered damages in an amount according to proof, but
7 no less than \$75,000,000 for Fedoseeva and \$50,000,000 for Sulkess.

8 85. Cross-complainants are entitled to the imposition of punitive damages because
9 Grishin's conduct was malicious and oppressive.

10 **FOURTH CAUSE OF ACTION**

11 **(Domestic Violence in violation of Civil Code §1708.6)**

12 **(By Fedoseeva against Grishin)**

13 86. Fedoseeva realleges and incorporate by reference herein the allegations set forth
14 in Paragraphs 1 through 63 above.

15 87. Fedoseeva and Grishin were at all relevant times husband and wife.

16 88. Grishin committed acts of domestic violence against Fedoseeva by placing her in
17 apprehension that she was going to be physically harmed and killed, and by punching and head-
18 butting her and breaking her teeth.

19 89. Fedoseeva was harmed by Grishin's actions.

20 90. Fedoseeva has suffered damages in an amount according to proof.

21 91. Fedoseeva is entitled to the imposition of punitive damages because Grishin's
22 conduct was malicious and oppressive.

23 92. Fedoseeva also seeks recovery of attorneys' fees and costs per statute.

24 **FIFTH CAUSE OF ACTION**

25 **(Assault)**

26 **(By Fedoseeva against Grishin)**

27 93. Fedoseeva realleges and incorporate by reference herein the allegations set forth
28 in Paragraphs 1 through 63 above.

1 94. Grishin intended to cause harmful or offensive contact to Fedoseeva when he
2 pointed a gun with a silencer at her.

3 95. Fedoseeva reasonably believed that Grishin was about to shoot her.

4 96. Fedoseeva did not consent to Grishin's conduct.

5 97. Fedoseeva suffered severe apprehension, fear, and emotional distress.

6 98. Fedoseeva has suffered damages in an amount according to proof.

7 99. Fedoseeva is entitled to the imposition of punitive damages because cross-
8 defendants' conduct was malicious and oppressive.

9 **SIXTH CAUSE OF ACTION**

10 **(Battery)**

11 **(By Fedoseeva against Grishin)**

12 100. Fedoseeva realleges and incorporate by reference herein the allegations set forth
13 in Paragraphs 1 through 63 above.

14 101. Grishin battered Fedoseeva by head-butting her and breaking her teeth.

15 102. Fedoseeva did not consent to Grishin's actions.

16 103. Fedoseeva was harmed by Grishin's actions.

17 104. A reasonable person would have been harmed by Grishin's actions.

18 105. Fedoseeva has suffered damages in an amount according to proof.

19 106. Fedoseeva is entitled to the imposition of punitive damages because cross-
20 defendants' conduct was malicious and oppressive.

21 **SEVENTH CAUSE OF ACTION**

22 **(Civil Extortion)**

23 **(By Fedoseeva against Grishin)**

24 107. Fedoseeva realleges and incorporates by reference herein the allegations set forth
25 in Paragraphs 1 through 63 above.

26 108. Grishin made threats of violence against Fedoseeva to extort the return of money
27 and personal property he had given her.

28 109. As a direct and proximate result of Grishin's extortion, Fedoseeva returned to

1 Grishin a watch and a camera he had gifted her.

2 110. Fedoseeva has sustained damages in an amount according to proof.

3 111. Fedoseeva is entitled to the imposition of punitive damages because Grishin's
4 conduct was malicious and oppressive.

5 WHEREFORE, Cross-complainants pray for judgment against cross-defendants, and
6 each of them, as follows:

7 1. On the First, Second, and Third causes of action: for damages according to proof,
8 but no less than \$75,000,000 for Fedoseeva and \$50,000,000 for Sulkess;

9 2. On the Fourth, Fifth, Sixth, and Seventh causes of action: for damages according
10 to proof; and

11 3. On the First and Third cause of action: for a permanent injunction against
12 Grishin barring him from continuing to harass, threaten, intimidate, and oppress Fedoseeva.

13 DATED: May 13, 2019

AFFELD GRIVAKES LLP

14 By:



15 Christopher Grivakes

16
17 Attorneys for Defendants and Cross-complainants,
18 TWELVE PRODUCTIONS, LTD., ANNA
19 FEDOSEEVA, and JENNIFER SULKESS
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1 **DEMAND FOR JURY TRIAL**

2 Cross-complainants ANNA FEDOSEEVA and JENNIFER SULKESS hereby demand
3 trial by jury of all issues so triable.

4
5 DATED: May 13, 2019

AFFELD GRIVAKES LLP

6
7 By: 

Christopher Grivakes

8 Attorneys for Defendants and Cross-complainants,
9 TWELVE PRODUCTIONS, LTD, ANNA
10 FEDOSEEVA, and JENNIFER SULKESS
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1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

3 I am employed in the County of Los Angeles, State of California. I am over the age of 18 and
4 not a party to the within action; my business address is: 2049 Century Park East, Suite 2460,
Los Angeles, California, 90067.

5 On May 13, 2019, I served the foregoing document(s) described as: **Second Amended Cross-**
6 **complaint** on interested parties in this action by placing ☐ the original ☒ true copy(ies) thereof
enclosed in sealed envelopes as stated below.

7 **Pierce Bainbridge Beck Price & Hecht LLP**

8 John M. Pierce
9 Amman Khan
10 Dan Terzian
600 Wilshire Blvd., Ste. 500
Los Angeles, CA 90017-3212
(213) 262-9333

11 Attorneys for Sergey Grishin and SG Acquisitions, LLC

12 ☒ (BY US MAIL) I am readily familiar with the firm's practice of collection and
13 processing correspondence for mailing with the US Postal Service. Under that practice
14 it would be deposited in the mail on that same day, at Los Angeles, California in the
ordinary course of business. The envelope was sealed and placed for collection and
mailing on that date following ordinary business practices.

15 ☐ (BY OVERNIGHT MAIL) I am readily familiar with the firm's practice of collection
16 and processing correspondence for mailing with an overnight courier service. Under that
17 practice it would be deposited with said overnight courier service on that same day with
18 delivery charges thereon billed to sender's account, at Los Angeles, California in the
ordinary course of business. The envelope was sealed and placed for collection and
mailing on that date following ordinary business practices.

19 ☐ (BY EMAIL) I served such document through email transmission. Based on a court order
20 or an agreement of the parties to accept email service, I caused the documents to be sent
21 to the persons at the email addresses listed above.

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

24 Executed on May 13, 2019, at Los Angeles, California.

25 Gabrielle Bruckner

26 [Print Name Of Person Executing Proof]

27 [Signature]