

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

JANE DOE,

Plaintiff,

-against-

Index No.: ____/2023

RUSSELL BRAND, WARNER BROS. PICTURES,
INC., WARNER BROS. DISCOVERY, INC., MBST
ENTERTAINMENT, INC., BENDERSPINK, INC.
and LANGLEY PARK PICTURES,

AFFIDAVIT

Defendants.

STATE OF NEW YORK)
) ss.:
COUNTY OF SUFFOLK)

I, [REDACTED] hereby state under penalty of perjury that:

1. I am the plaintiff in this matter, and I submit this affidavit in support of my Order to Show Cause, which seeks leave to prosecute this action, brought pursuant to the Adult Survivor’s Act, using “JANE DOE” in the case caption in place of my true name, to redact my true name from all documents filed in this action, and for such other relief as this Court deems just and proper.

2. On July 7, 2010, I was working on the set of the movie *Arthur*, when lead actor Russell Brand sexually assaulted me. Prior to the assault, Mr. Brand appeared intoxicated, smelled of alcohol, and was carrying a bottle of vodka on set. He then exposed his penis to me on set and in full view of the cast and crew, including people who were employees of Warner Bros. Pictures, Inc., Warner Bros. Discovery, Inc., MBST Entertainment, Inc., BenderSpink, Inc., and/or Langley Park Pictures. The sexual assault happened later that same day when I was in the bathroom. Mr.

Brand entered after me and assaulted me, as a member of the production crew guarded the door from outside.

3. As a result of the sexual abuse, I suffered and continue to suffer extreme embarrassment, shame, and fear. I am concerned that if my identity becomes known publicly in relation to this sexual abuse claim, that embarrassment, shame, and fear will be significantly worsened. Since this case involves a celebrity, I am also concerned that it will be of interest to a lot of people, which would only further exacerbate those feelings of embarrassment, shame, and fear, leading to irreparable harm to my mental health.

4. As a result of the sexual assault by Russell Brand, I have found it difficult to trust others. I fear that if my identity will become public, I will forever be tied to him on the Internet, worsening my feelings of distrust, betrayal, and isolation. I also expect any attention from this lawsuit to spill over to my friends and family, affecting my personal relationships.

5. I also have professional concerns about being named publicly in this matter. When the assault happened, it was the first day of a three-day booking. However, after the assault, I was not brought back for the second or third day, and was only paid for one day of work. I still maintain my career as an actor, and I am terrified of being blacklisted in the industry or suffering other negative effects beyond what I already suffered if my name is associated with a sexual assault lawsuit against others in the industry. I cannot bear to imagine my career that I love being jeopardized at this point in my life.

6. I also fear retaliation against me and those close to me if my name was publicly associated with a sexual assault claim against a celebrity with a social media presence that includes millions of followers, including some that idolize Mr. Brand. He has previously used his social media platform to rally his fan base to support him in the face of current accusations of impropriety made against him by others. I fear that among his millions of followers there will be some who would be willing and able to harass me and my loved ones in person and online, including potentially through violence, if my name and identity were to be made public.

7. Defendants will not be prejudiced in any way, as I am willing to provide all relevant personal information to them under the condition that defendants keep all such information confidential and limited for use in this case. Additionally, I am willing to sit for a deposition when the time comes and allow defendant to share the above-described information with defendants' attorneys and insurance carriers.

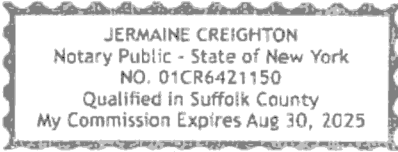
8. As such, I request that the Court grant the order to show cause for the relief sought and allow me to continue to prosecute my claims to the full extent of the law using a pseudonym.

WHEREFORE, I swear under penalty of perjury of law that the foregoing is true and correct.

Dated: October, New York
7th, 2023

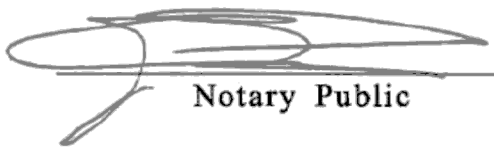
[REDACTED]

STATE OF NEW YORK)
) ss.:
COUNTY OF Suffolk)



[REDACTED] being duly sworn, deposes and says that she is the plaintiff in the within action, that she has read the foregoing affidavit and knows the contents thereof and that the same is true of her own knowledge, except as to those matters therein stated to be alleged upon information and belief, and as to those matters, she believes them to be true.

Sworn to me before me this
7th day of October, 2023



Notary Public