

1 Bryan J. Freedman (SBN 151990)
 Jacqueline C. Brown (SBN 177970)
 2 FREEDMAN & TAITELMAN, LLP
 1901 Avenue of the Stars, Suite 500
 3 Los Angeles, California 90067
 Tel: (310) 201-0005
 4 Fax: (310) 201-0045
 Email: bfreedman@fillp.com
 5 jbrown@fillp.com

6 Gregory L. Doll (SBN 193205)
 Michael A. Amir (SBN 204491)
 7 1888 Century Park East, Suite 1106
 Los Angeles, California 90067
 8 Tel.: (310) 557-9100
 Fax: (310) 557-9101
 9 email: gdoll@dollamir.com
 mamir@dollamir.com

10 Attorneys for Defendant MARIO LAVANDEIRA
 11

12 SUPERIOR COURT FOR THE STATE OF CALIFORNIA
 13 FOR THE COUNTY OF LOS ANGELES

14 SAMANTHA RONSON,

15 Plaintiff,

16 vs.

17 SUNSET PHOTO AND NEWS, LLC;
 JILL ISHKANIAN; MARIO LAVANDEIRA
 18 dba PEREZ HILTON; and DOES 1 through
 19 10, inclusive,

20 Defendants.
 21
 22

) Case No. BC374174

) [Assigned to the Honorable Elihu M. Berle,
 Dept. 42]

) STIPULATION FOR THE ENTRY OF AN
) ORDER GRANTING MOTION TO STRIKE
) COMPLAINT BROUGHT BY
) DEFENDANT MARIO LAVANDEIRA,
) AND STRIKING AND DISMISSING
) COMPLAINT AS TO LAVANDEIRA;
) [PROPOSED] ORDER THEREON

) Action filed: July 12, 2007
)
 23
 24
 25
 26
 27
 28

1 Plaintiff Samantha Ronson ("Ronson") and defendant Mario Lavandeira ("Lavandeira"),
2 by and through their respective counsel of record, hereby stipulate as follows:

3
4 1. On or about July 12, 2007, Ronson filed the above-referenced action alleging a
5 cause of action for defamation against Lavandeira and others.

6
7 2. On or about September 4, 2007, Lavandeira filed a motion to strike the complaint
8 pursuant to Code of Civil Procedure section 425.16 on the grounds that Ronson's complaint
9 arose from Lavandeira's exercise of his right of free speech in a public forum regarding a matter
10 of public interest and that Ronson could not demonstrate a reasonable probability of prevailing
11 on her defamation claim (the "Motion"). The hearing for the Motion was scheduled for
12 September 26, 2007.

13
14 3. On or about September 12, 2007, Ronson filed her opposition to the Motion. On
15 or about September 19, 2007, Lavandeira filed his reply in support of the Motion.

16
17 4. Having considered the arguments made, and evidence submitted, in support of the
18 Motion, Ronson agrees and stipulates to the entry of an order by Court granting the Motion,
19 striking the complaint in its entirety as to Lavandeira, and dismissing the complaint, with
20 prejudice, as to Lavandeira.

21
22 5. In consideration of Ronson's agreement and stipulation as set forth in paragraph 4,
23 and upon the Court entering the order contemplated thereby, Lavandeira agrees and stipulates to
24 waive his right to recover his attorneys' fees and costs associated with the Motion as provided by
25 Code of Civil Procedure section 425.16(c).

26
27 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

IT IS SO STIPULATED.

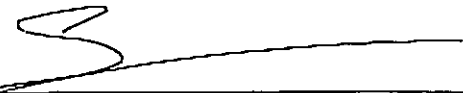
DATED: September __, 2007

FREEDMAN & TAITELMAN, LLP
DOLL, AMIR & ELEY, LLP

By: _____
BRYAN J. FREEDMAN
Attorneys for Defendant MARIO LAVANDEIRA

DATED: ~~September~~ ^{OCTOBER, 31} __, 2007

DAVIS & GILBERT LLP
BINGHAM McCUTCHEN LLP

By:  _____
~~MARTIN GARBUS~~
Attorneys for Plaintiff SAMANTHA RONSON

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

Having considered the complaint, the arguments and evidence in support of and in opposition to the Motion to Strike Complaint Pursuant to Code of Civil Procedure Section 425.16 (the "Motion") brought by defendant Mario Lavandeira ("Lavandeira"), and the stipulation of the parties, and for good cause appearing, IT IS HEREBY ORDERED that the Motion is GRANTED, the complaint is STRICKEN in its entirety as to Lavandeira, and the complaint is DISMISSED WITH PREJUDICE as Lavandeira.

IT IS SO ORDERED.

DATED:

Elihu M. Berle
Judge of the Superior Court