

GRADSTEIN & MARZANO, P.C.
Henry Gradstein (State Bar No. 89747)
hgradstein@gradstein.com
Maryann R. Marzano (State Bar No. 96867)
mmarzano@gradstein.com
Matthew A. Slater (State Bar No. 259986)
mslater@gradstein.com
6310 San Vicente Boulevard, Suite 510
Los Angeles, California 90048
Phone: (323) 776-3100

Attorneys for Plaintiff WADE ROBSON

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

WADE ROBSON, an individual,

Plaintiff,

vs.

DOE 1, an individual; MJJ PRODUCTIONS,
INC., a California corporation; MJJ
VENTURES, INC., a California corporation;
and DOES 4-50, inclusive,

Defendants.

Case No.: BC508502

[Related to probate case, BP117321]

*[Both cases assigned to the Honorable Judge
Mitchell L. Beckloff, Dept. 51]*

**PLAINTIFF WADE ROBSON'S FIRST SET
OF REQUESTS FOR ADMISSION TO
DEFENDANT MJJ VENTURES, INC.**

PROPOUNDING PARTY: PLAINTIFF WADE ROBSON

RESPONDING PARTY: MJJ VENTURES, INC.

SET NO.: One (1)

EXH-4

GRADSTEIN & MARZANO, P.C.
9310 SAN VICENTE BLVD, SUITE 510
LOS ANGELES, CALIFORNIA 90048
TELEPHONE: 323-776-3100

07/28/2014

Pursuant to California Code of Civil Procedure § 2033.010, *et seq.*, Plaintiff WADE ROBSON ("Wade Robson") hereby requests that MJJ VENTURES, INC. ("Responding Party") answer each of the following Requests for Admission (Set No. One) in writing under oath within thirty (30) days from the date of service hereof.

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1:

Admit that Michael Joseph Jackson (hereinafter "DECEDENT" who is also named as Doe 1 as defined in paragraph 2 of the Second Amended Complaint filed on February 19, 2014) was born on August 29, 1958.

REQUEST FOR ADMISSION NO. 2:

Admit that DECEDENT invited Wade Robson and his family to stay at DECEDENT's ranch in Santa Barbara County in or about February, 1990.

REQUEST FOR ADMISSION NO. 3:

Admit that Wade Robson and his family stayed at DECEDENT's ranch in Santa Barbara County in or about February, 1990.

REQUEST FOR ADMISSION NO. 4:

Admit that DECEDENT employed an audible alarm system for his bedroom at his ranch in Santa Barbara County.

REQUEST FOR ADMISSION NO. 5:

Admit that DECEDENT hung "do not disturb" signs on his bedroom door at his ranch in Santa Barbara County.

REQUEST FOR ADMISSION NO. 6:

Admit that sexual activities occurred between DECEDENT and Wade Robson periodically during the time period from approximately 1990 through 1997.

REQUEST FOR ADMISSION NO. 7:

Admit that sexual activities occurred between DECEDENT and Wade Robson during the time period from approximately 1990 through 1997.

07/28/2014

1 **REQUEST FOR ADMISSION NO. 8:**

2 Admit that, during the time period from approximately 1990 through 1997, DECEDENT
3 told Wade Robson never to tell anyone about their sexual activities.

4 **REQUEST FOR ADMISSION NO. 9:**

5 Admit that, during the time period from approximately 1990 through 1997, DECEDENT
6 told Wade Robson that people would not understand that their sexual activities were their way of
7 showing love.

8 **REQUEST FOR ADMISSION NO. 10:**

9 Admit that, during the time period from approximately 1990 through 1997, DECEDENT
10 told Wade Robson that if anyone were to ever find out about their sexual activities, both of their
11 lives and careers would be over.

12 **REQUEST FOR ADMISSION NO. 11:**

13 Admit that, during the time period from approximately 1990 through 1997, DECEDENT
14 told Wade Robson that if anyone were to ever find out about their sexual activities, they would
15 both go to jail.

16 **REQUEST FOR ADMISSION NO. 12:**

17 Admit that DECEDENT sexually abused Wade Robson on at least one occasion between
18 approximately 1990 and 1997.

19 **REQUEST FOR ADMISSION NO. 13:**

20 Admit that DECEDENT sexually abused Wade Robson during the period from
21 approximately 1990 to 1997.

22 **REQUEST FOR ADMISSION NO. 14:**

23 Admit that DECEDENT would refer to Wade Robson as "little one."

24 **REQUEST FOR ADMISSION NO. 15:**

25 Admit that, during the time period from approximately 1990 through 1997, DECEDENT
26 acted as a father figure toward Wade Robson.

27

28

07/28/2014

REQUEST FOR ADMISSION NO. 16:

Admit that, during the time period from approximately 1990 through 1997, DECEDENT acted as a mentor to Wade Robson.

REQUEST FOR ADMISSION NO. 17:

Admit that, during the time period from approximately 1990 through 1997, DECEDENT told Wade Robson that Wade Robson would become a film director.

REQUEST FOR ADMISSION NO. 18:

Admit that DECEDENT communicated by telephone with Wade Robson during the time period from approximately March 1990 to September 1991.

REQUEST FOR ADMISSION NO. 19:

Admit that DECEDENT communicated by facsimile with Wade Robson during the time period from approximately March 1990 to September 1991.

REQUEST FOR ADMISSION NO. 20:

Admit that DECEDENT caused Norma Staikos to arrange for Wade Robson to travel to California during the time period from approximately March 1990 to September 1991.

REQUEST FOR ADMISSION NO. 21:

Admit that Wade Robson visited DECEDENT during the time period from approximately March 1990 to September 1991.

REQUEST FOR ADMISSION NO. 22:

Admit that, during the time period from approximately 1990 through 1997, DECEDENT showed Wade Robson explicit adult pornography in the form of magazines, books and videos.

REQUEST FOR ADMISSION NO. 23:

Admit that, during the time period from approximately 1990 through 1997, DECEDENT showed Wade Robson sexually explicit material in the form of magazines, books and videos.

REQUEST FOR ADMISSION NO. 24:

Admit that, during the time period from approximately 1990 through 1997, DECEDENT showed Wade Robson material depicting nude women.

07/28/2014

REQUEST FOR ADMISSION NO. 25:

Admit that, during the time period from approximately 1990 through 1997, DECEDENT showed Wade Robson material depicting nude men.

REQUEST FOR ADMISSION NO. 26:

Admit that, during the time period from approximately 1990 through 1997, DECEDENT showed Wade Robson material depicting nude boys.

REQUEST FOR ADMISSION NO. 27:

Admit that, during the time period from approximately 1990 through 1997, DECEDENT encouraged Wade Robson to call him "Dad".

REQUEST FOR ADMISSION NO. 28:

Admit that, during the time period from approximately 1990 through 1997, DECEDENT called Wade Robson "son".

REQUEST FOR ADMISSION NO. 29:

Admit that, during the time period from approximately 1990 through 1997, DECEDENT told Wade Robson that he loved him.

REQUEST FOR ADMISSION NO. 30:

Admit that DECEDENT arranged for Responding Party to hire Wade Robson in or about September 1991.

REQUEST FOR ADMISSION NO. 31:

Admit that DECEDENT arranged for MJJ Productions, Inc. to hire Wade Robson in or about September 1991.

REQUEST FOR ADMISSION NO. 32:

Admit that DECEDENT arranged for Responding Party to hire Joy Robson in or about September 1991.

REQUEST FOR ADMISSION NO. 33:

Admit that DECEDENT arranged for MJJ Productions, Inc. to hire Joy Robson in or around September 1991.

GRADSTEIN & MARZANO, P.C.
8310 SAN VICENTE BLVD., SUITE 510
LOS ANGELES, CALIFORNIA 90048
TELEPHONE: 323-776-3100

07/28/2014

1 **REQUEST FOR ADMISSION NO. 34:**

2 Admit that Responding Party applied for an H1-B visa for Wade Robson in or about
3 September 1991.

4 **REQUEST FOR ADMISSION NO. 35:**

5 Admit that MJJ Productions, Inc. applied for an H1-B visa for Wade Robson in or about
6 September 1991.

7 **REQUEST FOR ADMISSION NO. 36:**

8 Admit that Wade Robson's H1-B visa application stated that he was an employee of
9 Responding Party.

10 **REQUEST FOR ADMISSION NO. 37:**

11 Admit that Responding Party applied for an H1-B visa for Joy Robson in or about
12 September 1991.

13 **REQUEST FOR ADMISSION NO. 38:**

14 Admit that MJJ Productions, Inc. applied for an H1-B visa for Joy Robson in or about
15 September 1991.

16 **REQUEST FOR ADMISSION NO. 39:**

17 Admit that Responding Party applied for an H-4 visa for Chantel Robson in or around
18 September 1991.

19 **REQUEST FOR ADMISSION NO. 40:**

20 Admit that Wade Robson was an employee of Responding Party from approximately 1991
21 to 1998.

22 **REQUEST FOR ADMISSION NO. 41:**

23 Admit that Wade Robson was an employee of MJJ Productions, Inc. from approximately
24 1991 to 1998.

25 **REQUEST FOR ADMISSION NO. 42:**

26 Admit that Joy Robson was an employee of Responding Party from approximately 1991 to
27 1998.

28

07/28/2014

REQUEST FOR ADMISSION NO. 43:

Admit that Joy Robson was an employee of MJJ Productions, Inc. from approximately 1991 to 1998.

REQUEST FOR ADMISSION NO. 44:

Admit that DECEDENT was Joy Robson's supervisor while she worked for Responding Party beginning in or about September 1991.

REQUEST FOR ADMISSION NO. 45:

Admit that DECEDENT was Joy Robson's supervisor while she worked for MJJ Productions, Inc. beginning in or about September 1991.

REQUEST FOR ADMISSION NO. 46:

Admit that Wade Robson visited DECEDENT at DECEDENT's condominium on more than one occasion during the period between 1991 and 1998.

REQUEST FOR ADMISSION NO. 47:

Admit that during the period of Joy Robson's employment with Responding Party between approximately 1991 and 1998, DECEDENT asked Joy Robson to bring Wade Robson to DECEDENT's condominium on more than one occasion.

REQUEST FOR ADMISSION NO. 48:

Admit that during the period of Joy Robson's employment with MJJ Productions, Inc. between approximately 1991 and 1998, DECEDENT asked Joy Robson to bring Wade Robson to DECEDENT's condominium on more than one occasion.

REQUEST FOR ADMISSION NO. 49:

Admit that in or around 1993, Joy Robson went to work for a hair studio and makeup company for which she was paid a salary by Responding Party.

REQUEST FOR ADMISSION NO. 50:

Admit that in or around 1993, Joy Robson went to work for a hair studio and makeup company for which she was paid a salary by MJJ Productions, Inc.

REQUEST FOR ADMISSION NO. 51:

Admit that Responding Party paid a salary to Joy Robson.

REQUEST FOR ADMISSION NO. 52:

Admit that MJJ Productions, Inc. paid a salary to Joy Robson.

REQUEST FOR ADMISSION NO. 53:

Admit that Responding Party stopped paying Joy Robson a salary when she became a permanent resident of the United States in or around 1998.

REQUEST FOR ADMISSION NO. 54:

Admit that MJJ Productions, Inc. stopped paying Joy Robson a salary when she became a permanent resident of the United States in or around 1998.

REQUEST FOR ADMISSION NO. 55:

Admit that DECEDENT arranged for Wade Robson to dance in one or more of DECEDENT's music videos.

REQUEST FOR ADMISSION NO. 56:

Admit that Responding Party arranged for Wade Robson to dance in one or more of DECEDENT's music videos.

REQUEST FOR ADMISSION NO. 57:

Admit that MJJ Productions, Inc. arranged for Wade Robson to dance in one or more of DECEDENT's music videos.

REQUEST FOR ADMISSION NO. 58:

Admit that Wade Robson was part of a musical group that released an album on DECEDENT's record label in or about 1993.

REQUEST FOR ADMISSION NO. 59:

Admit that, during the time period from approximately 1990 through 1997, sexual activities between DECEDENT and Wade Robson included DECEDENT putting his hand over Wade Robson's clothed penis.

REQUEST FOR ADMISSION NO. 60:

Admit that, during the time period from approximately 1990 through 1997, sexual activities between DECEDENT and Wade Robson included DECEDENT putting his hand inside Wade Robson's underpants.

REQUEST FOR ADMISSION NO. 61:

Admit that, during the time period from approximately 1990 through 1997, sexual activities between DECEDENT and Wade Robson included DECEDENT taking Wade Robson's hand and putting it over DECEDENT's clothed penis.

REQUEST FOR ADMISSION NO. 62:

Admit that, during the time period from approximately 1990 through 1997, sexual activities between DECEDENT and Wade Robson included DECEDENT taking Wade Robson's hand and putting it inside DECEDENT's underpants.

REQUEST FOR ADMISSION NO. 63:

Admit that, during the time period from approximately 1990 through 1997, sexual activities between DECEDENT and Wade Robson included kissing.

REQUEST FOR ADMISSION NO. 64:

Admit that, during the time period from approximately 1990 through 1997, sexual activities between DECEDENT and Wade Robson included French kissing.

REQUEST FOR ADMISSION NO. 65:

Admit that, during the time period from approximately 1990 through 1997, sexual activities between DECEDENT and Wade Robson included DECEDENT rubbing Wade Robson's penis.

REQUEST FOR ADMISSION NO. 66:

Admit that, during the time period from approximately 1990 through 1997, sexual activities between DECEDENT and Wade Robson included DECEDENT having Wade Robson rub DECEDENT's penis.

07/28/2014

REQUEST FOR ADMISSION NO. 67:

Admit that, during the time period from approximately 1990 through 1997, sexual activities between DECEDENT and Wade Robson included DECEDENT masturbating while watching Wade Robson from behind on all fours, naked, with his knees positioned and palms extended like a dog on all fours.

REQUEST FOR ADMISSION NO. 68:

Admit that, during the time period from approximately 1990 through 1997, sexual activities between DECEDENT and Wade Robson included DECEDENT spreading Wade Robson's buttocks and sticking his tongue into and licking Wade Robson's anus while DECEDENT masturbated using lotion.

REQUEST FOR ADMISSION NO. 69:

Admit that, during the time period from approximately 1990 through 1997, sexual activities between DECEDENT and Wade Robson included the mutual fondling of genitals with their hands.

REQUEST FOR ADMISSION NO. 70:

Admit that, during the time period from approximately 1990 through 1997, sexual activities between DECEDENT and Wade Robson included the mutual fondling of genitals with their mouths.

REQUEST FOR ADMISSION NO. 71:

Admit that, during the time period from approximately 1990 through 1997, sexual activities between DECEDENT and Wade Robson included mutual fellatio.

REQUEST FOR ADMISSION NO. 72:

Admit that, during the time period from approximately 1990 through 1997, sexual activities between DECEDENT and Wade Robson included Wade Robson lying on top of DECEDENT gyrating their genitals together.

07/28/2014

REQUEST FOR ADMISSION NO. 73:

Admit that, during the time period from approximately 1990 through 1997, sexual activities between DECEDENT and Wade Robson included showering naked together.

REQUEST FOR ADMISSION NO. 74:

Admit that, during the time period from approximately 1990 through 1997, sexual activities between DECEDENT and Wade Robson included DECEDENT's penetration of Wade Robson's anus with DECEDENT's penis.

REQUEST FOR ADMISSION NO. 75:

Admit that sexual activities between DECEDENT and Wade Robson occurred when Wade Robson was between the ages of 7 and 14.

REQUEST FOR ADMISSION NO. 76:

Admit that sexual activities between DECEDENT and Wade Robson occurred when DECEDENT was over the age of 31.

REQUEST FOR ADMISSION NO. 77:

Admit that, during the time period from approximately 1990 through 1997, DECEDENT engaged in sexual activities with boys under the age of 18 other than Wade Robson.

REQUEST FOR ADMISSION NO. 78:

Admit that Jordan Chandler filed a civil lawsuit against DECEDENT on or about September 14, 1993 for claims including sexual battery, battery, seduction, willful misconduct, intentional infliction of emotional distress, fraud and negligence (hereinafter "CHANDLER LAWSUIT").

REQUEST FOR ADMISSION NO. 79:

Admit that DECEDENT was criminally investigated in connection with the allegations made in the CHANDLER LAWSUIT (hereinafter "CHANDLER INVESTIGATION").

REQUEST FOR ADMISSION NO. 80:

Admit that DECEDENT selected, hired and paid for counsel to represent Wade Robson in relation to Wade Robson's Grand Jury subpoena in the CHANDLER INVESTIGATION.

REQUEST FOR ADMISSION NO. 81:

Admit that Responding Party paid for counsel to represent Wade Robson in relation to Wade Robson's Grand Jury subpoena in the CHANDLER INVESTIGATION.

REQUEST FOR ADMISSION NO. 82:

Admit that MJJ Productions, Inc. paid for counsel to represent Wade Robson in relation to Wade Robson's Grand Jury subpoena in the CHANDLER INVESTIGATION.

REQUEST FOR ADMISSION NO. 83:

Admit that DECEDENT coached Wade Robson about how Wade Robson should testify in the CHANDLER INVESTIGATION.

REQUEST FOR ADMISSION NO. 84:

Admit that DECEDENT told Wade Robson to testify in the CHANDLER INVESTIGATION that no sexual activities had occurred between them.

REQUEST FOR ADMISSION NO. 85:

Admit that DECEDENT told Wade Robson that if Wade Robson testified in the CHANDLER INVESTIGATION that sexual activities had occurred between them, they would both go to jail.

REQUEST FOR ADMISSION NO. 86:

Admit that DECEDENT told Wade Robson that if Wade Robson testified in the CHANDLER INVESTIGATION that sexual activities had occurred between them, both their careers would be over.

REQUEST FOR ADMISSION NO. 87:

Admit that DECEDENT settled the CHANDLER LAWSUIT for a sum in excess of \$15 million.

07/28/2014

REQUEST FOR ADMISSION NO. 88:

Admit that DECEDENT agreed to deliver "confessions of judgment . . . in the total amount of \$15,331,250, to be held in trust by the Minor's attorneys of record with no copies to be made or provided to any other person" in the Confidential Agreement and Mutual General Release that settled the CHANDLER LAWSUIT.

REQUEST FOR ADMISSION NO. 89:

Admit that DECEDENT was tried in 2005 in Santa Barbara County, California on criminal charges including child sexual abuse (hereinafter "2005 TRIAL").

REQUEST FOR ADMISSION NO. 90:

Admit that DECEDENT coached Wade Robson about how Wade Robson should testify in the 2005 TRIAL.

REQUEST FOR ADMISSION NO. 91:

Admit that DECEDENT told Wade Robson to testify in the 2005 TRIAL that no sexual activities had occurred between them.

REQUEST FOR ADMISSION NO. 92:

Admit that DECEDENT told Wade Robson that if Wade Robson testified in the 2005 TRIAL that sexual activities had occurred between them, they would both go to jail.

REQUEST FOR ADMISSION NO. 93:

Admit that DECEDENT told Wade Robson that if Wade Robson testified in the 2005 TRIAL that sexual activities had occurred between them, both their careers would be over.

1 DATED: May 21, 2014

GRADSTEIN & MARZANO, P.C.
HENRY GRADSTEIN
MARYANN R. MARZANO
MATTHEW A. SLATER

By: 

Maryann R. Marzano
Attorneys for Plaintiff WADE ROBSON

GRADSTEIN & MARZANO, P.C.
6310 SAN VICENTE BLVD, SUITE 510
LOS ANGELES, CALIFORNIA 90048
TELEPHONE: 323-776-3100

07/28/2014

28

07/28/2014

DECLARATION FOR ADDITIONAL DISCOVERY

I, Maryann R. Marzano, declare:

1. I am partner at Gradstein & Marzano, P.C., counsel of record for Plaintiff Wade Robson ("Plaintiff"). The facts set forth below are based upon my personal knowledge and, if called upon to testify as to the facts stated herein, I could and would competently so testify.

2. I am propounding to Respondent MJJ Ventures, Inc. ("Respondent") the attached Requests for Admission, Set One.

3. This set of requests will cause the total number of specially prepared requests propounded to the party to whom they are directed to exceed the number of specially prepared requests permitted by Section 2033.030 of the Code of Civil Procedure.

4. I have not previously propounded any requests to this party. I am simultaneously propounding official form interrogatories.

5. This set of Requests for Admission contains a total of ninety-three (93) specially prepared requests.

6. I am familiar with the issues and the previous discovery conducted by all of the parties in the case.

7. I have personally examined each of the questions in this set of requests.

8. This number of questions is warranted under Section 2033.040 of the Code of Civil Procedure because of the complexity of the existing and potential issues, the quantity of the existing and potential issues, the financial burden on Plaintiff of conducting discovery without the use of these requests, and the expedience of using this method of discovery. The questions contained in this set of requests are necessary to obtain information regarding the facts on which Plaintiff bases his claims, as well as facts relevant to Respondent's affirmative defenses.

///

///

///

1 9. None of the questions in this set of requests is being propounded for any improper
2 purpose, such as to harass the party, or the attorney for the party, to whom it is directed, or to
3 cause unnecessary delay or needless increase in the cost of litigation.

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

6 Executed on this twenty-first day of May, 2014 at Los Angeles, California.

7 
8 Maryahn R. Marzano
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 6310 San Vicente Boulevard, Suite 360, Los Angeles, California 90048.

On May 22, 2014, I served the foregoing document, described as **PLAINTIFF WADE ROBSON'S FIRST SET OF REQUESTS FOR ADMISSION TO DEFENDANT MJJ VENTURES, INC.** on each interested party in this action, as follows:

Howard Weitzman, Esq.
Jonathan Steinsapir, Esq.
Kinsella Weitzman Iser Kump & Aldisert LLP
808 Wilshire Boulevard, 3rd Floor
Santa Monica, CA 90401

Jeryll S. Cohen, Esq.
Hoffman, Sabban & Watenmaker, P.C.
10880 Wilshire Boulevard, Suite 2200
Los Angeles, California, 90024

Service was accomplished as follows.

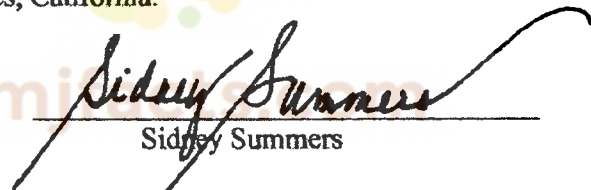
☒ (BY U.S. MAIL)

☒ I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

☒ I am readily familiar with the business practice of my place of employment in respect to the collection and processing of correspondence, pleadings and notices for mailing with United States Postal Service. The foregoing sealed envelope was placed for collection and mailing this date consistent with the ordinary business practice of my place of employment, so that it will be picked up this date with postage thereon fully prepaid at Beverly Hills, California, in the ordinary course of such business.

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

Executed on May 22, 2014, at Los Angeles, California.


Sidney Summers

GRADSTEIN & MARZANO, P.C.
6310 SAN VICENTE BLVD, SUITE 610
LOS ANGELES, CALIFORNIA 90048
TELEPHONE: 323-778-3100

07/28/2014