

**FILED**

LOS ANGELES SUPERIOR COURT

SEP 14 2009

JOHN A. CLARKE, CLERK

BY DAWN ALEXANDER, DEPUTY

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JUDGE AMY D. HOGUE

11 Attorneys for Plaintiff  
12 ARNOLD W. KLEIN, M.D.

13 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
14 COUNTY OF LOS ANGELES

15 ARNOLD W. KLEIN, M.D.,

16 Plaintiff,

17 v.

18 STEVEN HOEFFLIN, M.D., and DOES 1  
19 through 50,

20 Defendants.

CASE NO. **BC421181**

COMPLAINT FOR:

1. SLANDER
2. TRADE LIBEL
3. UNFAIR COMPETITION
4. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
5. NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
6. FALSE LIGHT

DEMAND FOR JURY TRIAL

21 Plaintiff, ARNOLD W. KLEIN, M.D. (hereinafter Plaintiff or "Dr. Klein") hereby alleges  
22 as follows:

GENERAL ALLEGATIONS

- 23 1. Dr. Klein is, and at all times pertinent herein was, an individual residing in the  
24 of California and in the City and County of Los Angeles.
- 25 2. Dr. Klein is a world renowned and respected Dermatologist.
- 26 3. Dr. Klein's practice includes cosmetic dermatology, which is an alternative  
27 cosmetic surgery. Dr. Klein has been credited as a pioneer in the use of collagen and botox and  
28 has been called the "king of collagen" and has been said to be responsible for "putting botox on

CIT/CASE: BC421181 LEA/BET  
 RECEIPT #: CCH481620870  
 DATE PAID: 09/14/09 083:1821  
 PAYMENT: \$155.00  
 RECEIVED:  
 CHECK: 35300  
 CASH:  
 CHANGE:  
 CARD:

Ropers Majeski Kohn & Bentley  
A Professional Corporation  
Los Angeles

09/14/09 083:1821

1 the map.”

2 4. Dr. Klein practices in Beverly Hills, California and his practice has catered to many  
3 wealthy and high profile individuals, including numerous celebrities. He is known as the  
4 Dermatologist to the Stars.

5 5. Dr. Klein has worked hard to establish a stellar reputation as a physician in the area  
6 of cosmetic dermatology. Dr. Klein has been a highly sought after publisher of medical articles,  
7 presenter and lecturer. A list of Dr. Klein’s pertinent lectures and presentations are attached  
8 hereto and incorporated by reference as Exhibit “A.”

9 6. Due to Dr. Klein’s excellent skill and reputation, his work in his field, as well as  
10 publications, presentations and lectures, he has been able to attract high-end, well-established  
11 celebrity patients. Such patients are extremely hard to obtain and keep. Indeed, it took Dr. Klein  
12 extensive time, effort and work in order to build a stellar reputation and successful high-profile  
13 practice that caters and services high-end and celebrity clients.

14 7. Dr. Klein is informed and believes and thereon alleges that Defendant, Steven  
15 Hoefflin, M.D. (hereinafter “Defendant” or “Hoefflin”) is, and at all times pertinent hereto was,  
16 an individual residing in the State of California, County of Los Angeles.

17 8. Plaintiff is ignorant of the true name and capacities, whether individual, corporate,  
18 associate or otherwise of the other Defendants sued herein as DOES 1 through 50 and therefore  
19 sues said Defendants, and each of them, under such fictitious names. Dr. Klein will amend his  
20 complaint to set forth the true names and capacities of these Defendants and each of them when  
21 ascertained. Dr. Klein is informed and believes and thereon alleges that said Defendants, and  
22 each of them, were negligent or acted in some other actionable manner and are legally responsible  
23 for causing the events, happenings and occurrences alleged herein.

24 9. Dr. Klein is informed and believes and based thereon alleges that at all times herein  
25 mentioned, Defendants, and each of them, were the agents, trustees, partners, servants, joint  
26 ventures, contractors, authorized representatives and/or employees of their Co-Defendants and the  
27 acts and omissions herein alleged were done by them, acting individually, through such capacity  
28 and within the scope of their authority, and with the permission, consent, authorization and

DOES 1-50

1 ratification of their Co-Defendants and/or were thereafter ratified by each of the Co-Defendants  
2 and that each of them are jointly and severely liable to Dr. Klein. Dr. Klein further alleges that as  
3 between certain corporation Defendants, there exists, at all times mentioned herein a unity of  
4 interest of ownership between such Defendants such that any individual and separateness between  
5 those Defendants have ceased, and that such Defendant is the alter-ego of each other so that  
6 adherence to the fiction of the separate existence of these corporate Defendants as distinct entities  
7 from other Defendants would permit abuse of the corporate privilege, sanction fraud and promote  
8 injustice.

9 **MICHAEL JACKSON**

10 10. It had been widely reported and known that Dr. Klein was the Dermatologist for  
11 Michael Jackson (along with other notable individuals) for quite some time. Indeed, Dr. Klein's  
12 relationship with Michael Jackson spanned many years and during this time they became close  
13 friends. It was also widely known that Dr. Klein would visit socially with Michael Jackson, his  
14 children and their mutual friends.

15 11. For a period of time, Hoefflin also worked as a healthcare provider for Michael  
16 Jackson. Media reports have claimed that Hoefflin treated Michael Jackson between 1978 and  
17 2002.

18 12. Dr. Klein and Hoefflin were and are doctors practicing in Los Angeles, California.  
19 Dr. Klein and Hoefflin both catered to similar patients, and from time to time, shared a few  
20 patients. Despite the fact that Dr. Klein and Hoefflin shared patients, they were and continue to  
21 be competitors in a highly specialized and elite field which caters to a very exclusive clientele.

22 13. On June 25, 2009, Michael Jackson died. Following this death, the Los Angeles  
23 Coroner's office commenced an investigation to determine the cause of death of Michael Jackson.  
24 On September 1, 2009, the Los Angeles County Coroner's office released a statement which  
25 stated:

26 "Earlier this month, the Los Angeles County Department of  
27 Coroner completed its investigation into the death of Michael  
28 Joseph Jackson, age 50, who died on June 25, 2009.

The cause of death was established as:

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ACUTE PROPOFOL INTOXICATION

OTHER CONDITIONS CONTRIBUTING TO THE DEATH:  
BENZODIAZEPINE EFFECT.”

The manner of death has been ruled . . . HOMICIDE”

14. Subsequent to the death of Michael Jackson, there has been a media frenzy around the world regarding the life of Michael Jackson and the facts, circumstances and cause of his death. This media frenzy unfortunately has provided a number of individuals with a “stage” to get their “fifteen minutes of fame” and to broadcast and publish a number of untrue and baseless allegations against various individuals, including Dr. Klein.

15. One of the central individuals inserting himself into the media circus is Hoefflin. Soon after the death of Michael Jackson, Hoefflin claimed that he was an authorized spokesman of Katherine Jackson and that he was also working on a book with her. Hoefflin used this purported cache to garner interviews with various media outlets. Interestingly, Katherine Jackson’s lawyer indicated Hoefflin was not authorized to speak on her behalf. The same is true with respect to the Estate of Michael Jackson and its special administrators. Copies of e-mails disputing such claims by Hoefflin are attached hereto as Exhibit “B.”

16. Hoefflin also made libelous, slanderous and other statements about Dr. Klein. Said statements affected Dr. Klein in his profession, disclosed private facts about Dr. Klein and portrayed him in a false light.

17. After hearing Hoefflin’s statements, on July 24, 2009, counsel for Dr. Klein forwarded an e-mail to Hoefflin demanding he:

“immediately agree to retract all false information which you have disseminated about Dr. Klein and not to publish any further such false statements.”

18. Despite this e-mail, the statements made by Hoefflin continued. Most egregiously, and pertinent hereto, on or about August 26, 2009, Hoefflin made a number of untrue and injurious statements about Dr. Klein during an interview with David Willetts, a reporter with The Sun. During that interview, Hoefflin unbelievably stated that in the minutes following Michael

1 Jackson's death that: "Murray definitely called Klein because Klein taught him how to  
2 administer Propofol." Hoefflin continued that "Murray would have counted on Klein to be the  
3 source of Propofol and guide him in its use."

4 19. The statements identified in Paragraph 18 above are referred to herein as the  
5 "ACTIONABLE STATEMENTS." At the time Hoefflin uttered the ACTIONABLE  
6 STATEMENTS, he failed to use reasonable care to determine the truth or falsity of those  
7 statements. The ACTIONABLE STATEMENTS were and are false statements of fact and  
8 unprivileged. Hoefflin orally uttered and communicated the ACTIONABLE STATEMENTS to  
9 The Sun reporter, David Willetts and David Willetts reasonably understood that the  
10 ACTIONABLE STATEMENTS were about Dr. Klein.

11 20. Worse yet, at the time Hoefflin made the ACTIONABLE STATEMENTS, he knew  
12 the those statements were false and/or had serious doubts about the truth of those statements.

13 21. At the time Hoefflin made and published the ACTIONABLE STATEMENTS to  
14 David Willetts, a reporter with The Sun, it was reasonably foreseeable that the ACTIONABLE  
15 STATEMENTS would be republished. In fact, on or about August 26, 2009, The Sun,  
16 republished Hoefflin's ACTIONABLE STATEMENTS and quoted Hoefflin in an article,  
17 entitled, *Jacko 'dead 47 mins' as doc made 3 calls'* (hereinafter "ACTIONABLE  
18 REPUBLISHED STATEMENTS"), a true and correct copy of the Sun Article is attached hereto  
19 as Exhibit "C."

20 22. Because the facts and circumstances known to the public and reporters following  
21 Michael Jackson's death, at the time Hoefflin made the ACTIONABLE STATEMENTS,  
22 Hoefflin intended to thrust Dr. Klein into the media frenzy, portray Dr. Klein in a negative light  
23 and subject Dr. Klein to contempt, ridicule and shame. Further, Dr. Klein is informed and  
24 believes and thereon alleges that Dr. Hoefflin made the ACTIONABLE STATEMENTS in an  
25 effort to damage Dr. Klein's reputation and divert Dr. Klein's clients away from Dr. Klein's  
26 practice.

27 23. At the time Hoefflin uttered the ACTIONABLE STATEMENTS, he reasonably  
28 understood that David Willetts and/or the readers of The Sun article described above, and any

1 other reporters or members of the public following Michael Jackson's death would erroneously  
2 believe that Dr. Klein was implicated in the homicidal death of Michael Jackson, either as the  
3 source of the lethal Propofol and/or as the guide to whoever was responsible for the lethal  
4 Propofol treatment of Michael Jackson and/or the alleged immediate post-mortem activities  
5 surrounding Michael Jackson's death. Hoefflin knew that the ACTIONABLE REPUBLISHED  
6 STATEMENTS and the ACTIONABLE REPUBLISHED STATEMENTS would be picked up  
7 on the internet and viewed around the world.

8 24. The ACTIONABLE STATEMENTS and ACTIONABLE REPUBLISHED  
9 STATEMENTS, or any conclusions naturally flowing from are ludicrous, utterly false, and  
10 baseless.

11 25. Hoefflin's ACTIONABLE STATEMENTS were despicable and expose, and  
12 continue to expose, Dr. Klein to hatred, contempt, ridicule, and disgrace. As a natural  
13 consequence of the ACTIONABLE STATEMENTS and ACTIONABLE REPUBLISHED  
14 STATEMENTS, Dr. Klein has been shunned and avoided. As a further result of the  
15 ACTIONABLE STATEMENTS and ACTIONABLE REPUBLISHED STATEMENTS, Dr.  
16 Klein has suffered shame, mortification and hurt feelings. In making said ACTIONABLE  
17 STATEMENTS, Hoefflin was acting with actual malice, oppression and/or fraud. Said  
18 ACTIONABLE STATEMENTS made by Hoefflin were slanderous per se and have caused  
19 extensive damage to Dr. Klein's business and professional reputation. Further, Dr. Klein has  
20 been forced to spend money as a direct result of the ACTIONABLE STATEMENTS.

21 **FIRST CAUSE OF ACTION**

22 **(Slander Against All Defendants, Including DOES 1-50)**

23 26. Dr. Klein incorporates by reference Paragraphs 1-25 as fully set forth herein:

24 27. The ACTIONABLE STATEMENTS and ACTIONABLE REPUBLISHED  
25 STATEMENTS by Hoefflin and as ratified, authorized and approved by DOES 1-50 alleged  
26 above are false statements of fact. These ACTIONABLE STATEMENTS of fact and  
27 ACTIONABLE REPUBLISHED STATEMENTS expose Dr. Klein to hatred, contempt, ridicule,  
28 disgrace, cause Dr. Klein to be shunned and avoided and have injured his reputation as a person

1 and in his occupation. Said ACTIONABLE STATEMENTS and ACTIONABLE  
2 REPUBLISHED STATEMENTS imply Dr. Klein is involved with a crime. Further, the  
3 ACTIONABLE STATEMENTS and ACTIONABLE REPUBLISHED STATEMENTS are  
4 injuring Dr. Klein in his profession and as a natural consequence of these statements, Dr. Klein  
5 has sustained damage.

6 28. The ACTIONABLE STATEMENTS set forth above were published to a reporter  
7 during an interview and widely broadcast throughout the world. Hoefflin was aware of and had  
8 knowledge of how his false and unprivileged statements would be disseminated throughout the  
9 world and republished. In making the ACTIONABLE STATEMENTS, Hoefflin intended to  
10 disseminate and publish the false and misleading statements to the public in general and  
11 specifically to current and potential clients of Dr. Klein, as well as others in the medical  
12 community. The ACTIONABLE STATEMENTS made by Hoefflin were made with actual  
13 malice. Further, said ACTIONABLE STATEMENTS were slanderous per se.

14 29. As a result of Hoefflin's ACTIONABLE STATEMENTS and ACTIONABLE  
15 REPUBLISHED STATEMENTS, Dr. Klein has incurred substantial injury to himself and his  
16 practice. Dr. Klein has incurred and will continue to incur compensatory damages as well as  
17 general and special damages. The amount of these damages will be proven at trial.

18 30. The conduct of Defendants and each of them was willful, fraudulent, malicious,  
19 oppressive and reckless and done with the conscious disregard of Dr. Klein's rights and with the  
20 intent to injure and harm Dr. Klein and with the intent to deprive Dr. Klein of his property and  
21 legal rights, thus entitling Dr. Klein to recovery exemplary damages in an amount sufficient to  
22 punish and make an example of Defendants.

23 **SECOND CAUSE OF ACTION**

24 **(For Trade Libel Against All Defendants, Including DOES 1-50)**

25 31. Dr. Klein hereby incorporates by reference 1 through 30 as fully set forth herein.

26 32. The ACTIONABLE STATEMENTS and ACTIONABLE REPUBLISHED  
27 STATEMENTS by Hoefflin and as ratified, authorized and approved by DOES 1-50 were false  
28 and misleading and intentionally disparaged the quality of Dr. Klein's medical services and

1 induced others in the general public not to deal with Dr. Klein. Said ACTIONABLE  
2 STATEMENTS caused damage to Dr. Klein.

3 33. Said false ACTIONABLE STATEMENTS and ACTIONABLE REPUBLISHED  
4 STATEMENTS disparage the quality of Dr. Klein's medical treatment.

5 34. Said ACTIONABLE STATEMENTS and ACTIONABLE REPUBLISHED  
6 STATEMENTS induced others not to deal with Dr. Klein. Accordingly, Dr. Klein has  
7 experienced general and special damages as a result of said ACTIONABLE STATEMENTS and  
8 ACTIONABLE REPUBLISHED STATEMENTS.

9 35. As a result of Hoefflin's ACTIONABLE STATEMENTS and ACTIONABLE  
10 REPUBLISHED STATEMENTS, Dr. Klein has incurred substantial injury to himself and his  
11 practice. Dr. Klein has incurred and will continue to incur compensatory damages, as well as  
12 general and special damages. The amount of these damages will be proven at trial.

13 36. The conduct of Defendants and each of them was willful, fraudulent, malicious,  
14 oppressive and reckless and done with the conscious disregard of Dr. Klein's rights and with the  
15 intent to injure and harm Dr. Klein and with the intent to deprive Dr. Klein of his property and  
16 legal rights, thus entitling Dr. Klein to recovery of exemplary damages in an amount sufficient to  
17 punish and make an example of Defendants.

18 **THIRD CAUSE OF ACTION**

19 **(Unfair Competition Against All Defendants, Including DOES 1-50)**

20 37. Dr. Klein hereby incorporates by reference paragraphs 1 through 36 as fully set forth  
21 herein.

22 38. The above described ACTIONABLE STATEMENTS and ACTIONABLE  
23 REPUBLISHED STATEMENTS by Hoefflin were false and misleading and intentionally  
24 disparaged the quality of Dr. Klein's medical services and induced others in the general public  
25 not to deal with Dr. Klein. Said ACTIONABLE STATEMENTS and ACTIONABLE  
26 REPUBLISHED STATEMENTS caused damage to Dr. Klein.

27 39. Dr. Klein has brought the instant claim for unfair competition because he has  
28 suffered injury in fact and individual loss of money as a legal and proximate result of the unfair

1 and illegal conduct by Hoefflin and DOES 1-50.

2 40. On information and belief, Hoefflin and DOES 1-20 have a pattern of practice of  
3 violating statutes, ordinances and a common law in caring out unfair and/or unlawful conduct  
4 complained of above.

5 41. Unless Hoefflin and DOES 1-50 are restrained by a preliminary or permanent  
6 injunction of this Court, other individuals who may be subject to offensive and harassing and  
7 illegal conduct above will be injured. Dr. Klein has no plain, speedy or adequate remedy at law  
8 to prevent Hoefflin and DOES 1-50 from continuing to engage in the conduct complained of  
9 above.

10 42. WHEREFORE, Dr. Klein prays the Court relief as set forth below.

11 **FOURTH CAUSE OF ACTION**

12 **(Intentional Infliction Of Emotion Distress Against All Defendants, Including DOES 1-50)**

13 43. Dr. Klein hereby incorporates by reference 1 through 42 as fully set forth herein.

14 44. The above described ACTIONABLE STATEMENTS and ACTIONABLE  
15 REPUBLISHED STATEMENTS by Hoefflin were false, misleading and intentionally disparaged  
16 the quality of Dr. Klein's medical services and induced others in the general public not to deal  
17 with Dr. Klein. Said ACTIONABLE STATEMENTS and ACTIONABLE REPUBLISHED  
18 STATEMENTS caused damage to Dr. Klein.

19 45. As a result of the intentional misconduct of Defendants as to the ACTIONABLE  
20 STATEMENTS and ACTIONABLE REPUBLISHED STATEMENTS, Dr. Klein has suffered  
21 and continues to suffer severe emotional distress. Dr. Klein suffered humiliation and emotional  
22 stress by reading of the ACTIONABLE STATEMENTS and ACTIONABLE REPUBLISHED  
23 STATEMENTS intentionally made by Hoefflin and as approved, and ratified by DOES 1-50.  
24 These ACTIONABLE STATEMENTS and ACTIONABLE REPUBLISHED STATEMENTS  
25 caused Dr. Klein extreme embarrassment and humiliation and has injured his practice. The fact  
26 that Dr. Klein's practice which he has spent years building has been damaged by the  
27 ACTIONABLE STATEMENTS and ACTIONABLE REPUBLISHED STATEMENTS caused  
28 him extreme emotional distress.

1 46. The conduct of Defendants in making the ACTIONABLE STATEMENTS and  
2 ACTIONABLE REPUBLISHED STATEMENTS was extreme, outrageous and unprivileged.  
3 Such conduct goes beyond all bounds of decency so as to be regarded as atrocious and utterly  
4 intolerable in a civilized community. Defendants, in making the ACTIONABLE STATEMENTS  
5 and ACTIONABLE REPUBLISHED STATEMENTS, intended to cause Dr. Klein to suffer  
6 extreme emotional distress; or in the alternative, were made with a reckless disregard of the  
7 probability of causing Dr. Klein to suffer extreme emotional distress. As a direct and proximate  
8 result of Defendants making ACTIONABLE STATEMENTS and ACTIONABLE  
9 REPUBLISHED STATEMENTS, Dr. Klein suffered and continues to suffer severe emotional  
10 distress. Dr. Klein suffers and continues to suffer substantial and enduring mental distress,  
11 mental suffering and mental anguish, including fright, nervousness, grief, anxiety, worry,  
12 mortification, shock, humiliation and indignity.

13 47. As a direct and proximate result of the conduct of Defendants in making the  
14 ACTIONABLE STATEMENTS and ACTIONABLE REPUBLISHED STATEMENTS, Dr.  
15 Klein has suffered and continues to suffer general and special damages.

16 48. The conduct of Defendants was willful, oppressive and done with a conscious  
17 disregard of Dr. Klein's rights with the intent to injure Dr. Klein. Thus, Dr. Klein is entitled to  
18 recover exemplary damages under Code of Civil Procedure in an amount sufficient to punish and  
19 make an example of Defendants.

20 **FIFTH CAUSE OF ACTION**

21 **(Negligent Infliction Of Emotional Distress Against All Defendants, Including DOES 1-50)**

22 49. Dr. Klein hereby incorporates by reference 1 through 48 as fully set forth herein.

23 50. The ACTIONABLE STATEMENTS and ACTIONABLE REPUBLISHED  
24 STATEMENTS by Hoefflin were false, misleading and intentionally disparaged the quality of  
25 Dr. Klein's medical services and induced others in the general public not to deal with Dr. Klein.  
26 Said ACTIONABLE STATEMENTS and ACTIONABLE REPUBLISHED STATEMENTS  
27 caused damage to Dr. Klein.

28 51. As a result of misconduct of Defendants, Dr. Klein has suffered and continues to

1 suffer severe emotional distress. Dr. Klein suffered humiliation and distress by first learning of  
2 the ACTIONABLE STATEMENTS and ACTIONABLE REPUBLISHED STATEMENTS made  
3 by Hoefflin.

4 52. The conduct of Defendants in making the ACTIONABLE STATEMENTS and  
5 ACTIONABLE REPUBLISHED STATEMENTS was extreme, outrageous and unprivileged.  
6 Such conduct was beyond all possible bounds of decency so as to be regarded as atrocious and  
7 intolerable in a civilized community. Defendants, in making the ACTIONABLE STATEMENTS  
8 and ACTIONABLE REPUBLISHED STATEMENTS were negligent towards the possibility of  
9 causing Dr. Klein to suffer emotional distress. As a direct and proximate result of Defendants  
10 making the ACTIONABLE STATEMENTS and ACTIONABLE REPUBLISHED  
11 STATEMENTS, Dr. Klein suffered and continues to suffer, severe emotional distress.

12 53. Dr. Klein suffered and continues to suffer general and special damages.

13 **FIFTH CAUSE OF ACTION**

14 **(False Light Against All Defendants, Including DOES 1-50)**

15 54. Dr. Klein hereby incorporates by reference 1 through 53 as fully set forth herein

16 55. In making the ACTIONABLE STATEMENTS and ACTIONABLE  
17 REPUBLISHED STATEMENTS referenced above, Hoefflin and DOES 1-50 portrayed Dr. Klein  
18 in a false light in the public.

19 56. The ACTIONABLE STATEMENTS and ACTIONABLE REPUBLISHED  
20 STATEMENTS made by Hoefflin and DOES 1-50 were publicized to the public in general.  
21 Further, the ACTIONABLE STATEMENTS and ACTIONABLE REPUBLISHED  
22 STATEMENTS were untrue and were on unfair and inaccurate depiction of how Dr. Klein  
23 practices medicine. This false light placed Dr. Klein in a position which is highly offensive to a  
24 reasonable person. In making the ACTIONABLE STATEMENTS and ACTIONABLE  
25 REPUBLISHED STATEMENTS referenced above which placed Dr. Klein in a false light,  
26 Hoefflin and DOES 1-50 had knowledge of the falsity and acted in reckless disregard of Dr.  
27 Klein's rights.

28 57. The ACTIONABLE STATEMENTS and ACTIONABLE REPUBLISHED

1 STATEMENTS referenced above caused general and special damages to Dr. Klein.

2 58. The conduct of Defendants and each of them was willful, fraudulent, malicious,  
3 oppressive and reckless and done with the conscious disregard of Dr. Klein's rights and with the  
4 intent to injure and harm Dr. Klein and with the intent to deprive Dr. Klein of his property and  
5 legal rights, thus entitling Dr. Klein to recovery exemplary damages in an amount sufficient to  
6 punish and make an example of Defendants

7 PRAYER

8 WHEREFORE, Dr. Klein prays for judgment against Hoefflin and DOES 1-50, inclusive,  
9 as set forth below.

- 10 1. General damages according to proof at the time of trial;
  - 11 2. Special damages according to proof at the time of trial;
  - 12 3. Punitive damages;
  - 13 4. Injunctive Relief to stop the offensive and harassing conduct;
  - 14 5. Cost of suit herein incurred and for other such relief as the Court may deem just
- 15 and proper.

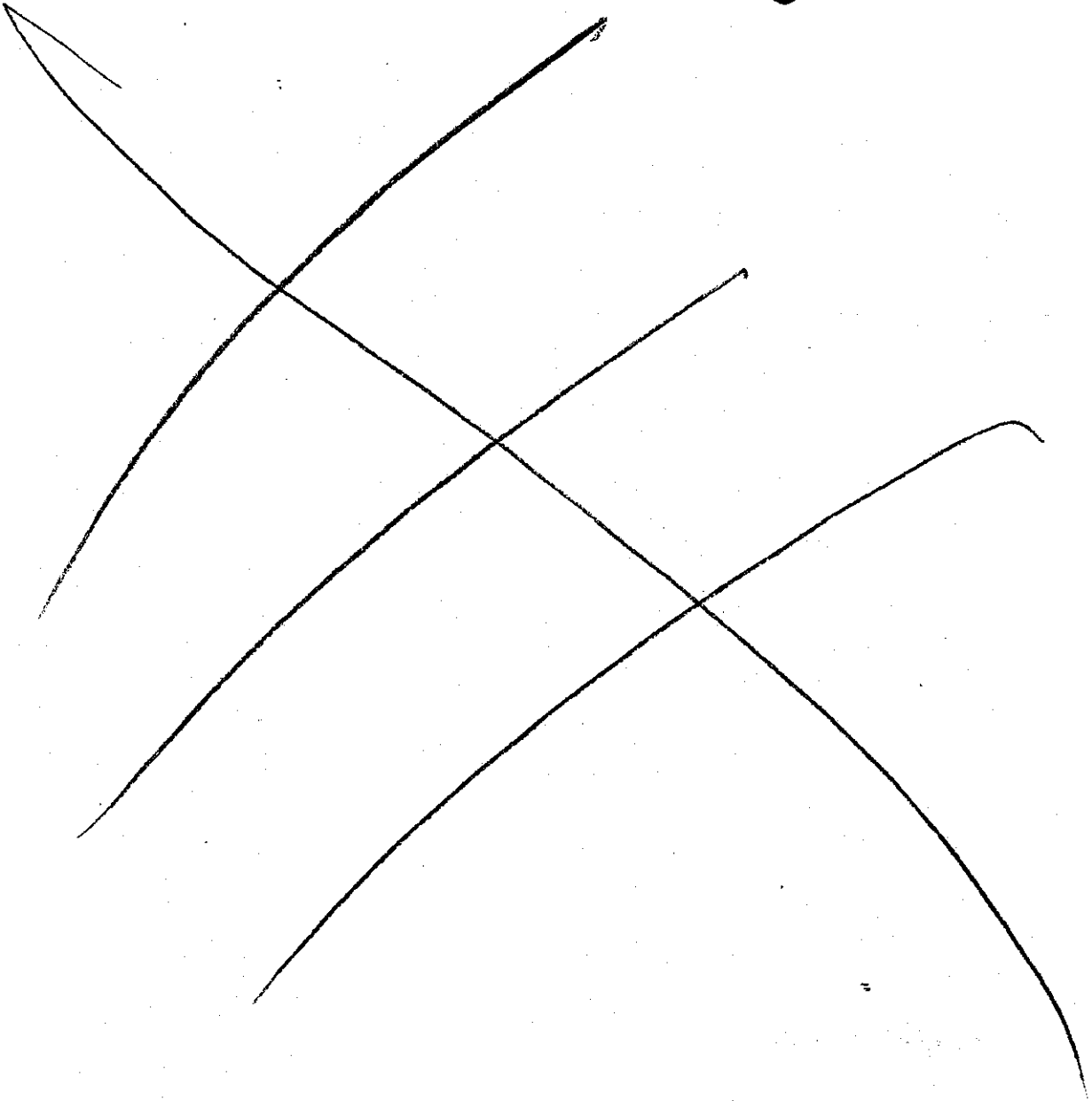
16 Dated: September 14, 2009

17 ROPERS, MAJESKI, KOHN & BENTLEY

18 By: 

19 RICHARD L. CHARNLEY  
20 BRADLEY P. BOYER  
21 SAUNDRA K. WOOTTON  
22 Attorneys for Plaintiff  
23 ARNOLD W. KLEIN, M.D.  
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**EXHIBIT "A"**

## Presentations

January 1970; Drug Abuse Symposium; Stetson College; DeLand, Florida

March 1971; Drug Abuse Symposium; University of Pennsylvania; Philadelphia, Pennsylvania

March 1971; Drug Abuse Symposium; Colby College; Waterville, Maine

December 1973; "Nickel Allergy: An Animal Model," (in association with Dr. M. Samitz); American Academy of Dermatology; Chicago, Illinois

February 1974; "Nickel Allergy: An Animal Model," (in association with Dr. M. Samitz); Carmel Skin Club; Carmel, California

December 1975; "An Unusual Tumor (Gross and Microscopic)"; American Academy of Dermatology; Chicago, Illinois

December 1975; "Emergency Dermatology"; Cedars-Sinai Medical Center, Grand Rounds; Los Angeles, California

April 1976; "Common Questions in Dermatology and Skin Care"; Los Angeles Baptist College; Los Angeles, California

May 1976; "Common Questions in Dermatology and Skin Care"; U.C.L.A. Extension Course for Primary Physicians; Los Angeles, California

June 1976; "Cosmetics"; Southern California Cosmetologists Meeting; Santa Barbara, California

June 1977; "Cosmetics"; Southern California Cosmetologists Meeting; Santa Barbara, California

July 1977; "Psoriasis and PUVA Therapy"; Psoriasis Association of Southern California; Los Angeles, California

September 1977; Biology of Cancer Series; Glendale Community College; Skin Cancer presentation; Glendale, California

August 1978; "Dermatology and Internal Medicine"; U.C.L.A. Extension Course for Primary Physicians; Los Angeles, California

September 1978; Biology of Cancer Series; Glendale Community College; Skin Cancer presentation; Glendale, California

December 1978; "Establishing and Managing a Dermatology Practice"; American Academy of Dermatology; San Francisco, California

100-100-100

EXH A



October 1983; "Therapeutic Hotline"; Stanford University School of Medicine; Department of Dermatology; Grand Canyon, Arizona

October 1983; "Collagen"; 4th International Congress on Dermatologic Surgery; Granada, Spain

November 1983; "Facial Augmentation by Injection"; Aesthetic Plastic Surgery Symposium; New York, New York

December 1983; "Advances in Collagen Implantation"; American Academy of Dermatology; Chicago, Illinois

January 1984; "Dermatology for the Internist"; Postgraduate Medicine; U.C.L.A. Extension; Los Angeles, California

January 1984; "Workshop: Cocktail Dermatology"; Annual Meeting of the Society of Graduate internists of U.C.L.A.; Los Angeles, California

March 1984; "Skin Implants"; New York University Medical Center; New York, New York

June 1984; "Zyderm in the Periorbital Region"; U.C.L.A. Jules Stein Eye Institute; Los Angeles, California

October 1984; "Collagen and Silicone"; 5th International Congress of Dermatologic Surgery; Jerusalem, Israel

November 1984; "Collagen"; Stanford University School of Medicine, Grand Rounds; Palo Alto, California

March 1985; "Dermatologic Surgery: State of the Art; Zyderm I or II - When, Where, and How"; University of California San Francisco, School of Medicine; Incline Village, Nevada

April 1985; "Collagen - Special Techniques For Injection, Results and Complications"; Interspecialty Facial Surgery Congress for Aesthetic, Cancer and Reconstructive Surgery; New York, New York

September 1985; "Techniques and Current Concepts in Dermabrasion, Chemical Peel and Soft-Tissue Augmentation - Collagen Implantation"; American Society For Dermatologic Surgery; San Diego, California

October 1985; "Collagen and Silicone"; International Congress of Dermatologic Surgery; Rome, Italy

October 1985; "Collagen Implantation"; Cosmetic Blepharoplasty Workshop; U.C.L.A. Jules Stein Eye Institute; Los Angeles, California

December 1985; "Collagen"; U.C.L.A. Jules Stein Eye Institute; Los Angeles, California

May 1986; "Injectable Therapy for Contour Defects: Silicone and Collagen"; Aesthetic Plastic Surgery Symposium; New York, New York

May 1986; "Zyderm Collagen"; Grand Rounds, Yale University; New Haven, Connecticut

June 1986; Cosmetic Blepharoplasty Workshop; U.C.L.A. Jules Stein Eye Institute; Los Angeles, California

August 1986; "Latest Advances In Cosmetic Surgery of the Face"; Foundation For Facial Plastic Surgery; Newport Beach, California

September 1986; "Application and Technical Hints"; International Symposium of Injectable Collagen; Munich, FRG

September 1986; "Injectable Collagen"; Los Angeles Society of Plastic Surgeons; Los Angeles, California

December 1986; "Collagen Around The Eyes"; U.C.L.A. Jules Stein Eye Institute; Los Angeles, California

June 1987; "Collagen"; University of Southern California, Grand Rounds; Los Angeles, California

August 1987; "Collagen Update and Adverse Reactions"; The Foundation for Facial Plastic Surgery; Newport Beach, California

August 1987; "Nonsurgical Resurfacing: Retin-A"; The Foundation for Facial Plastic Surgery; Newport Beach, California

May 1988; "Soft-Tissue Augmentation"; Ortho Workshops; U.C.L.A.; Los Angeles, California

May 1988; "Injectable Collagen and Topical Retinoids in the Treatment of Photoaging"; Skin Cancer Symposium; American Cancer Society; San Diego, California

October 1988; "Injectable Collagen"; U.C.L.A. Grand Rounds (Dermatology) Lecture; U.C.L.A.; Los Angeles, California

November 1988; "Injectable Collagen"; Harbor-U.C.L.A., Grand Rounds (Dermatology) Lecture; Harbor General Hospital; Torrance, California

December 1988; "Injectable Collagen"; American Academy of Dermatology (Annual Meeting); Washington, D.C.

March 1989; "Tissue Augmentation"; American Society of Dermatologic Surgery (Annual Meeting); Ft. Lauderdale, Florida



December 1992; "Tissue Augmentation"; Course Director and Presenter, American Academy of Dermatology (Annual Meeting); San Francisco, California

April 1993; "Injectable Collagen," The American Society for Aesthetic Plastic Surgery; Boston, Massachusetts

April 1993; Visiting Professor, Department of Dermatology; University of Pennsylvania; School of Medicine; Philadelphia, Pennsylvania

June 1993; "Collagen Implant Today"; IX International Congress on Aesthetic Medicine; Rome, Italy

June 1993; International Symposium on Collagen Implant; IX International Congress on Aesthetic Medicine; Rome, Italy

December 1993; "Tissue Augmentation"; Course Director and Presenter, American Academy of Dermatology (Annual Meeting); Washington, D.C.

September 1994; "First French Collagen Symposium"; Paris, France

February 1995; "Tissue Augmentation"; Course Director and Presenter, American Academy of Dermatology (Annual Meeting); New Orleans, Louisiana

February 1995; "The Repeatedly Injected Lip Syndrome"; Association of Surgical Faculty, American Academy of Dermatology; New Orleans, Louisiana

May 1995; "Soft-Tissue Augmentation"; Director and Presenter, American Society for Dermatologic Surgery (Meeting); Hilton Head, South Carolina

August 1995; "An Update on Collagen and Other Substances Used for Soft-Tissue Augmentation"; Ninth Annual Symposium on latest advances in Cosmetic Surgery of the face; Foundation for Facial Plastic Surgery; Newport Beach, California

September 1995; "Injectable Collagen and Botox"; XVth Congress of the International Society for Dermatologic Surgery; Budapest, Hungary

October 1995; "Practical Experience with the Cosmetic Use of Botox"; Cosmetic Uses of Botulinum Toxin; University of British Columbia; Vancouver, B.C.

October 1995; The Beauty Summit; New York, New York

December 1995; "Injectable Collagen and Botox"; Grand Rounds, U.C.L.A. Division of Dermatology; Los Angeles, California

February 1996 "Botox for the Less than Fearless," Association of Surgical Faculty, American Academy of Dermatology; Washington, D.C.

February 1996; "Tissue Augmentation"; Presenter and Course Director, American Academy of Dermatology; Washington, DC.

February 1996; "Collagen"; Cosmetic Surgery Symposia; American Academy of Dermatology; Washington, D.C.

May 1996; "Teoria e practica implante de Colageno"; IV RACMaine-Reuniao Anualde Cosmiatria e Medicina Estetica; Sao Paulo, Brazil

May 1996; "O Uso da Toxina Botulinica para correcao de Rugas"; IV RACMaine-Reuniao Anual de Cosmiatria e Medicina Estetica; Sau Paulo, Brazil

June 1996; "Injectable Collagen"; Grand Rounds, U.C.L.A. Division of Dermatology; Los Angeles, California

July 1996; "Botox"; Cosmetic Surgery Seminar; Academy 96, American Academy of Dermatology; Disneyworld; Orlando, Florida

September 1996; "Facial Rejuvenation: Collagen and Botox"; XVIIth Congress of International Society for Dermatologic Surgery 96; Tel Aviv, Israel

September 1996; "Intradermal Injections"; XVIIth Congress of the International Society for Dermatologic Surgery 96; Tel Aviv, Israel

November 1996; "Zyderm and Zyplast in Clinical Practice"; 11th Annual Dialogues in Cosmetic Dermatology; La Costa Resort; Carlsbad, California

November 1996; "What's New in Hollywood (Botox)"; 11th Annual Dialogues in Cosmetic Dermatology; La Costa Resort; Carlsbad, California

March 1997; "Botox, Collagen, Fibrel & Gore-Tex--Where to Put What?"; Botulinum A to Z New Horizons...Beyond Laser Resurfacing; Fulton Skin Institute; Newport Beach, California

March 1997; "Tissue Augmentation"; Presenter and Course Director, American Academy of Dermatology 55th Annual Meeting; San Francisco, California

March 1997; "Rejuvenation of the Aging Mouth with Implantable Collagen"; Advanced Cosmetic Dermatologic Surgery Course, American Academy of Dermatology 55th Annual Meeting; San Francisco, California

March 1997; "Botox Update: Dilution or Delusion"; Association of Surgical Faculty Meeting, American Academy of Dermatology 55th Annual Meeting; San Francisco, California

March 1997; "The Ligmaject", "Zyderm in the Corner of the Mouth", "Botulinum Toxin: Dilution & Storage", "Botulinum Toxin for the Less than Fearless"; Surgical Pearls Symposium, American Academy of Dermatology 55th Annual Meeting; San Francisco, California

March 1997; "Botox: How, When & Why?"; Cosmetic Surgery Symposium, American Academy of Dermatology 55th Annual Meeting; San Francisco, California

May 1997; "Use of EMG Guidance for Botulinum Toxin Injections"; Botulinum Toxin Symposium, American Society for Dermatologic Surgery 55th Annual Meeting; Boston, Massachusetts

June 1997; "Hetero - Collagen", "Fibrel"; Soft Tissue Augmentation Course, 19th World Congress of Dermatology; Sydney, Australia

July 1997; "Botox: The Latest Techniques"; Superficial Anatomy and Cutaneous Surgery, UCSD San Diego; San Diego, California

August 1997; "Botox/Collagen - My Experience"; Facial Rejuvenation Workshop, Academy '97, American Academy of Dermatology; New York City, New York

August 1997; "Botulinum Toxin"; Grand Rounds, Department of Med/Derm, U.C.L.A. Medical Center; Los Angeles, California

November 1997; "Zyderm & Zyplast", "Botox from Forehead to Neck", "What's New in My Office Cosmetic Practice?"; 12th Annual Dialogues in Cosmetic Dermatology; Walt Disney World Resort; Orlando, Florida

December 1997; "Botox / Beverly Hills Approach"; Live Surgery Workshop Debates in Cosmetic Surgery; Fulton Skin Institute; Newport Beach, California

February 1998; "The Old Gray Mare Ain't What She Used To Be"; Advanced Cosmetic Surgery Course, American Academy of Dermatology 56th Annual Meeting; Orlando, Florida

February 1998; "Injectable Collagen"; New Principles and Techniques of Tissue Augmentation Course, American Academy of Dermatology 56th Annual Meeting; Orlando, Florida

March 1998; "Collagen and Substances on the Horizon"; Cosmetic Surgery Symposium, American Academy of Dermatology 56th Annual Meeting; Orlando, Florida

March 1998; "Botulinum Toxin and Collagen for the Aging Face"; Aging Skin Symposium, American Academy of Dermatology 56th Annual Meeting; Orlando, Florida

April 1998; "Botox injection - update on new uses"; Aspen Winter Surgery Seminar; Aspen, Colorado

April 1998; "Newer substances for soft tissue defects"; Aspen Winter Surgery Seminar; Aspen, Colorado

April 1998; "Collagen implantation"; Aspen Winter Surgery Seminar; Aspen, Colorado

April 1998; "Tissue Augmentation with Collagen"; Luxurians Conference and Workshop; Buenos Aires, Argentina

April 1998; "Botox - The Next Generation"; Luxurians Conference and Workshop; Buenos Aires, Argentina

April 1998; "My Experience with Collagen and Botox"; II Simposio Internacional de Procedimientos en Cirugía y Dermatología Facial; Buenos Aires, Argentina

May 1998; "Collagen"; Presenter and Course Director, Tissue Augmentation and Botulinum Exotoxin Symposium, American Society for Dermatologic Surgery 25th Annual Clinical and Scientific Meeting; Portland, Oregon

May 1998; "New Fillers for Treatment of Facial Rhytides"; Facial Rejuvenation Symposium, American Society for Dermatologic Surgery 25th Annual Clinical and Scientific Meeting; Portland, Oregon

May 1998; "Changing the Face of the Future"; Media Event; New York, New York

July 1998; "Botox: The Latest Techniques"; 15th Annual Superficial Anatomy and Cutaneous Surgery; UCSD San Diego; San Diego, California

October 1998; "Botox, from forehead to neck"; Congrès National De Médecine Esthétique Et De Chirurgie Dermatologique; Paris, France

October 1998; "What's new in my practice in Beverly Hills (Botox)"; Congrès National De Médecine Esthétique Et De Chirurgie Dermatologique; Paris, France

October 1998; "Botox"; Los Angeles Metropolitan Dermatological Society; Los Angeles, California

November 1998; "Botox and Collagen"; Stanford University School of Medicine; San Francisco, California

November 1998; "Botox and Filling Substances"; U.C.L.A. Medical Center; Los Angeles, California

December 1998; "Advanced Techniques in Bovine Collagen Therapy and Other New Filler Agents"; UCSF 2nd Minimally Invasive Aesthetic Surgery Course; San Francisco, California

January 1999; "Treatment of the Aging Face"; Third Annual International Symposium on Aging Skin; San Francisco, California

January 1999; "Botox for Facial Lines"; Third Annual International Symposium on Aging Skin; San Francisco, California

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- February 1999; "Cosmetic Enhancement Educational Initiative"; Beverly Hills, California
- February 1999; "Cosmetic Minisymposium: Botox, Collagen and other Injectables"; Current Concepts in Dermatology, Premillennium Update; Palm Springs, California
- March 1999; "New Directions In Cosmetic Enhancements (Botox)"; Clinical Overview and Practice Enhancements; Dana Point, California
- March 1999; "New Filling Substances"; Cosmetic Surgery, 57th Annual American Academy of Dermatology Meeting; New Orleans, Louisiana
- March 1999; "Collagen & New Filling Substances"; Tissue Augmentation, 57th Annual American Academy of Dermatology Meeting; New Orleans, Louisiana
- March 1999; "Collagen & Other Injectables of the Skin"; Fundamentals of Cosmetic Surgery, 57th Annual American Academy of Dermatology Meeting, New Orleans, Louisiana
- March 1999; "Botulinum Toxin Neutralizing Antibodies - Fact or Fiction"; Advanced Cosmetic Surgery, 57th Annual American Academy of Dermatology Meeting; New Orleans, Louisiana
- March 1999; "What's new in my practice in Beverly Hills (Botox)"; Dermatology, Ethics, Pharmacology, Feeding Science; XX Congresso Nazionale, Societa Italiana di Medicina Estetica; Roma, Italy
- March 1999; "Collagen Workshop"; XX Congresso Nazionale, Societa Italiana di Medicina Estetica; Roma, Italy
- April 1999; "New Directions In Cosmetic Enhancements (Botox)"; Clinical Overview and Practice Enhancements; Boston, Massachusetts
- April 1999; "Botulinum Toxin: Botox - Theory Practice"; Symposium I: Topical and Minimally Invasive Therapy; Boston, Massachusetts
- April 1999; "Soft Tissue Augmentation with Collagen and Newer Filler Substances"; Symposium II: Office Surgery and Techniques; Boston, Massachusetts
- April 1999; "Botox for Facial Lines"; National Taiwan Aesthetic Surgical Association; Taipei, Taiwan
- April 1999; "Botox for Facial Lines"; Plastic Surgery Department of National Taiwan University Hospital; Taipei, Taiwan
- April 1999; "Botox for Facial Lines"; Taiwanese Dermatologic Society; Taipei, Taiwan
- April 1999; "Botox for Facial Lines"; Hong Kong Sanitorium and Hospital; Plastic Surgery Department; Hong Kong

April 1999; "Botox for Facial Lines"; Hong Kong Sanitorium and Hospital; Hong Kong

April 1999; "Botox for Facial Lines"; Demonstration for Key Users and Press Interview; Seoul, Korea

April 1999; "Botox for Facial Lines"; Demonstration at Medium PS Clinic; Seoul, Korea

April 1999; "Botox for Facial Lines"; Demonstration workshop at LEE JI HAM DER/PS Clinic; Seoul, Korea

April 1999; "Botox for Facial Lines"; Seoul National University Hospital; Seoul, Korea

May 1999; "New Directions In Cosmetic Enhancements (Botox)"; Clinical Overview and Practice Enhancements; Honolulu, Hawaii

May 1999; "New Directions In Cosmetic Enhancements (Botox)"; Clinical Overview and Practice Enhancements; Miami, Florida

May 1999; "Injectable Fillers"; Symposia Moderator, American Society for Dermatologic Surgery 26th Annual Clinical and Scientific Meeting; Miami, Florida

May 1999; "Resistance to Botulinum Toxin"; American Society for Dermatologic Surgery 26th Annual Clinical and Scientific Meeting; Miami, Florida

May 1999; "Collagen, Isolagen & New Fillers"; American Society for Dermatologic Surgery 26th Annual Clinical and Scientific Meeting; Miami, Florida

June 1999; "New Directions in Cosmetic Enhancements (Botox)"; Clinical Overview and Practice Enhancements; Atlanta, Georgia

June 1999; "New Directions in Cosmetic Enhancements (Botox)"; Clinical Overview and Practice Enhancements; Orlando, Florida

June 1999; "New Directions in Cosmetic Enhancements (Botox)"; Clinical Overview and Practice Enhancements; Coronado, California

July 1999; "New Directions in Cosmetic Enhancements (Botox)"; Clinical Overview and Practice Enhancements; Las Vegas, Nevada

July 1999; "Botox: The Latest Techniques"; Superficial Anatomy and Cutaneous Surgery; Scripps Clinic; La Jolla, California

July 1999; "Botox for Crow's Feet and Suborbital Area", Planning Meeting For New Directions in Cosmetic Enhancements; New York, New York

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- July 1999; "Traditional Therapeutic Approaches for the Treatment of Hyperhidrosis"; Planning Meeting For New Directions In Cosmetic Enhancements; New York, New York
- July 1999; "Repetitive Dosing and Potential Sensitization (Botox)"; Planning Meeting for New Directions in Cosmetic Enhancements"; New York, New York
- September 1999; "Cosmetic Treatment of the Face With Botox"; Darmstadt, Germany
- September 1999; "20 Years Experience With Zyderm Collagen Implant"; Lindau, Germany
- September 1999; "Botox Injection"; Lindau, Germany
- September 1999; "New Directions in Cosmetic Enhancements (Botox)"; Advanced Techniques, Boston, Massachusetts
- September 1999; "New Directions in Cosmetic Enhancements (Botox)"; Advanced Techniques; New York, New York
- October 1999; "Botox 1999"; 3rd Appearance Medicine Seminar; Coolum, Australia
- October 1999; "Collagen and Other Filling Substances"; 3rd Appearance Medicine Seminar; Coolum, Australia
- October 1999; "Botox 1999"; Medicine Society of Australasia Conference; Melbourne, Australia
- October 1999; "Botox 1999"; NSW Chapter of Plastic Surgeons Meeting; Sydney, Australia
- October 1999; "Botox 1999"; Victorian Chapter Cosmetic Physicians Society; Melbourne, Australia
- October 1999; "Botox for the New Millennium"; Dermatology Update for the Millennium; San Francisco, California
- November 1999; "New Directions in Cosmetic Enhancements (Botox)"; Advanced Techniques, Blue Ribbon Health Symposium; Los Angeles, California
- November 1999; "Facial Implants"; 12th International Congress on Aesthetic Medicine; Rio de Janeiro, Brazil
- November 1999; "New Directions in the Treatment of Hyperhidrosis (Botox)"; Clinical Overview and Practice Techniques; Houston, Texas
- November 1999; "New Directions in the Treatment of Hyperhidrosis (Botox)"; Clinical Overview and Practice Techniques; Miami, Florida

- December 1999; "New Directions in Cosmetic Enhancements (Botox)"; Clinical Overview and Practice Techniques; Long Beach, California
- December 1999; "What's New in Filler Substances"; Advances in Medical and Surgical Dermatology for the New Millennium; Mount Sinai Medical Center; New York, New York
- December 1999; "Botox Workshop"; Advances in Medical and Surgical Dermatology for the New Millennium; Mount Sinai Medical Center; New York, New York
- January 2000; "New Directions in Cosmetic Enhancements (Botox)"; Clinical Overview and Practice Techniques; Stockholm, Sweden
- January 2000; "New Directions in Cosmetic Enhancements (Botox)"; Clinical Overview and Practice Techniques; Geneva, Switzerland
- January 2000; "New Directions in Cosmetic Enhancements (Botox)"; Clinical Overview and Practice Techniques; Frankfurt, Germany
- January 2000; "Botox™ Therapy"; Fourth Annual International Symposium on Aging Skin; Fort Lauderdale, Florida
- January 2000; Botox Workshop; Fourth Annual International Symposium on Aging Skin; Fort Lauderdale, Florida
- March 2000; "When & How I Use Soft Tissue Fillers"; Soft Tissue Augmentation, Panel Discussion; Drs. Carruthers, Fulton, Swinehart, Wirtzer; 58th Annual American Academy of Dermatology Meeting; San Francisco, California
- March 2000; "New Tissue Augmentation Products"; Tissue Augmentation, 58th Annual American Academy of Dermatology Meeting; San Francisco, California
- March 2000; "Non-FDA Approved Uses for Botulinum Toxin in Dermatology"; Drs. A. Carruthers, J. Carruthers, R. Glogau; Master Class: Demonstration of Dermatologic Office Surgery, 58th Annual American Academy of Dermatology Meeting; San Francisco, California
- April 2000; "Filling Substances"; Cosmetic Dermatology, Los Angeles Metropolitan Dermatological Society Meeting; Los Angeles, California
- May 2000; "Soft Tissue Augmentation with Collagen & Newer Filler Substances"; Symposium I: Topical & Minimally Invasive Therapy; Cosmetic Surgery, Current Concepts and Evolving Techniques; Boston, Massachusetts
- May 2000; "Botulinum Toxin: Botox® - Theory & Practice"; Symposium II: Office Surgery & Techniques; Cosmetic Surgery, Current Concepts and Evolving Techniques; Boston, Massachusetts

May 2000; Moderator - Live Interactive Surgical Demonstrations; Cosmetic Surgery, Current Concepts and Evolving Techniques; Boston, Massachusetts

May 2000; "New Directions in Cosmetic Enhancements: Advanced Techniques (Botox)"; Newport Beach, California

May 2000; "An Update on Injectable Fillers and Botulinum Toxin"; New Technique in Facial Rejuvenation and Body Recontouring as it Relates to the Orbital-Facial Plastic Surgeon; Jules Stein Eye Institute; Los Angeles, California

May 2000; Botox Workshop, New Technique in Facial Rejuvenation and Body Recontouring as it Relates to the Orbital-Facial Plastic Surgeon; Jules Stein Eye Institute; Los Angeles, California

May 2000; "New Directions in Cosmetic Enhancements: Advanced Techniques (Botox)"; San Diego, California

June 2000; "New Directions in the Treatment of Hyperhidrosis (Botox)"; San Diego, California

June 2000; "New Directions in Cosmetic Enhancements: Advanced Techniques (Botox)"; Las Vegas, Nevada

June 2000; "BOTOX: The Latest Techniques"; 17th Annual Conference, Superficial Anatomy and Cutaneous Surgery; La Jolla, California

June 2000; Botox Workshop; 17th Annual Conference, Superficial Anatomy and Cutaneous Surgery; La Jolla, California

July 2000; "Update on Filler Substances"; U.C.L.A. Medical Center; Los Angeles, California

September 2000; "Soft Tissue Augmentation: Filling Rather Than Pulling"; The 22nd Annual LASPS Plastic Surgery Symposium; Los Angeles, California

October 2000; "Current Concepts in Facial Rejuvenation: Fillers and Chemodenervation"; Pasadena, California

October 2000; "Horizontal Forehead Lines"; Cosmetic Botulinum Toxin for the Expert; Vancouver, Canada

November 2000; "Botulinum Toxins: Forehead"; American Society for Dermatologic Surgery 27th Annual Clinical and Scientific Meeting

November 2000; "Introduction to Filling Substances"; American Society for Dermatologic Surgery 27th Annual Clinical and Scientific Meeting

November 2000; "Injectable Fillers for Wrinkles and Scars"; American Society for Dermatologic Surgery 27th Annual Clinical and Scientific Meeting

November 2000; Director of Symposium on Filler Substances and Cosmetic Dermatologic Surgery; American Society for Dermatologic Surgery 27th Annual Clinical and Scientific Meeting

November 2000; Director of Breakfast Session on Filling Substances; American Society for Dermatologic Surgery 27th Annual Clinical and Scientific Meeting

November 2000; "Collagen & Other Fillers"; Advances in Aesthetic Plastic Surgery: The Cutting Edge III; New York, New York

November 2000; "Botox", Mount Sinai School of Medicine, Cosmetic Surgery Lecture Series; New York, New York

November 2000; "Current Concepts in Facial Rejuvenation: Fillers and Chemodenervation"; Boston, Massachusetts

November 2000; "Current Concepts in Facial Rejuvenation: Fillers and Chemodenervation"; Washington, DC

December 2000; "Current Concepts in Facial Rejuvenation: Fillers and Chemodenervation (Botox)"; Houston, Texas

December 2000; "Ancillary Procedures in Facial Rejuvenation: Overview of Facial Fillers"; The New York Regional Society of Plastic Surgery, Master of Plastic Surgery; New York, New York

December 2000; Panel Discussion: The Master of Plastic Surgery; The New York Regional Society of Plastic Surgery; New York, New York

December 2000; "Current Concepts in Facial Rejuvenation: Fillers and Chemodenervation"; Newport Beach, California

January 2001; "What's New in Filler Substances"; Allergan Botox Advisory Board Meeting; Newport Beach, California

January 2001; "Botox - The Marvel of Rejuvenation for the Face"; The 12th Annual Eastern Winter Dermatology Meeting; Stowe, Vermont

January 2001; "Soft Tissue Augmentation"; The 12th Annual Eastern Winter Dermatology Meeting; Stowe, Vermont

March 2001; "Botox in the Forehead"; Botulinum Toxin Course 101. 59th Annual American Academy of Dermatology Meeting; Washington, DC

March 2001; "Fillers 2001"; Therapeutic Hotline, 59th Annual American Academy of Dermatology Meeting; Washington, DC

March 2001; "Skin Filling: Collagen and Other Common Injectables of the Skin"; Fundamentals of Cosmetic Surgery, 59th Annual American Academy of Dermatology Meeting; Washington, DC

March 2001; "Injection Bovine Collagen & Human Collagen"; Tissue Augmentation, 59th Annual American Academy of Dermatology Meeting; Washington, DC

April 2001; "A Review of Filler Substances for Soft Tissue Augmentation: The Beverly Hills Method"; 13th Annual Aspen Winter Surgery Seminar; Aspen, Colorado

April 2001; "Botox Therapy: State of the Art"; 13th Annual Aspen Winter Surgery Seminar; Aspen, Colorado

April 2001; "Soft Tissue Augmentation 2001"; Dermadream: Minimally Invasive Surgery Symposium; Rio de Janeiro, Brazil

April 2001; "Botox 2001"; Dermadream: Minimally Invasive Surgery Symposium; Rio de Janeiro, Brazil

April 2001; "Soft Tissue Augmentation 2001"; Dermadream: Minimally Invasive Surgery Symposium; Porto Alegre, Brazil

April 2001; "Botox 2001"; Dermadream: Minimally Invasive Surgery Symposium; Porto Alegre, Brazil

April 2001; "Actualization on Botox & Collagen"; III Simposio Internacional de Procedimientos en Cirugía y Dermatología Facial. Nuevas Perspectivas en el Tratamiento del Envejecimiento de la Cara; Buenos Aires, Argentina

April 2001; "Soft Tissue Fillers: The Past, Present and the Future"; American Academy of Facial Plastic and Reconstructive Surgery - Combined Otolaryngological Society Meeting; Palm Desert, California

April 2001; Panel: Challenges and Controversies in Soft Tissue Augmentation American Academy of Facial Plastic and Reconstructive Surgery - Combined Otolaryngological Society Meeting; Palm Desert, California

April 2001; "Botox 2001"; Merrill Lynch Specialty Pharmaceutical Bus Tour; Newport Beach, California

May 2001; "Botulinum Toxin for Treatment of Facial Lines"; 5th Annual International Symposium on Aging Skin; Coronado, California

May 2001; "Botox Workshop"; 5th Annual International Symposium on Aging Skin; Coronado, California

July 2001; "BOTOX: The Latest Techniques"; 18th Annual Conference Superficial Anatomy and Cutaneous Surgery Symposium; La Jolla, California

July 2001; Botox Workshop, 18th Annual Conference Superficial Anatomy and Cutaneous Surgery Symposium; La Jolla, California

July 2001; Course Director - Course # WRK 405 "Advances in the Use of Botulinum Toxin"; American Academy of Dermatology 2001 Summer Meeting

July 2001; "Dilution and Storage of Botulinum Toxins"; American Academy of Dermatology 2001 Summer Meeting; California

July 2001; "Shaping the Eyebrow With Botulinum Toxin"; American Academy of Dermatology 2001 Summer Meeting; California

July 2001; Advanced Surgical Techniques: "Advances in Fillers"; American Academy of Dermatology 2001 Summer Meeting; California

August 2001; "What's New in Soft Tissue Augmentation: The Flood Continues"; American Academy of Dermatology 2001 Summer Meeting; California

September 2001; "Filling Substances with a Special Emphasis on Collagen - The Gold Standard"; Tokyo, Japan

September 2001; Collagen Workshop; Tokyo, Japan

October 2001; "New Applications for Botox"; 20th Anniversary Fall Clinical Dermatology Conference; Las Vegas, Nevada

October 2001; Botox Workshop"; 20th Anniversary Fall Clinical Dermatology Conference; Las Vegas, Nevada

October 2001 "The Future of Injectable Soft Tissue Augmentation", American Society for Dermatologic Surgery, Dallas, Texas

October 2001; "Injectable Fillers for Wrinkles & Scars"; American Society for Dermatologic Surgery; Dallas, Texas

November 2001; "Botulinum Toxin"; 6th Asian Dermatological Congress in Thailand: Advances in Cosmetic Surgery; Bangkok, Thailand

November 2001; "Soft Tissue Augmentation"; 6th Asian Dermatological Congress in Thailand: Advances in Cosmetic Surgery; Bangkok, Thailand



February 2002; "Choosing an Appropriate Approach for Lip Augmentation"; Advanced Cosmetic Surgery Course, 60th Annual American Academy of Dermatology Meeting; New Orleans, Louisiana

February 2002; "Recent Advances in Filling Agents"; Focus Session, 60th Annual American Academy of Dermatology Meeting; New Orleans, Louisiana

March 2002; "Soft Tissue Augmentation"; 3rd Annual Phoenix Dermatology Open; Phoenix, Arizona

March 2002; "Botox – My Way"; 3rd Annual Phoenix Dermatology Open; Phoenix, Arizona

March 2002; Workshop A: Botox & Myobloc; 3rd Annual Phoenix Dermatology Open; Phoenix, Arizona

April 2002; "Soft Tissue Fillers"; American Society for Aesthetic Society Plastic Surgery 2002 Meeting; Las Vegas, Nevada

May 2002; "Fillers"; American Society for Aesthetic Society Plastic Surgery 2002 Meeting; Las Vegas, Nevada

May 2002; "Botox, Hands On – Learn My Technique"; Skin Disease Education Foundation; Cosmetic Dermatology Seminar 2002; Coronado, California

May 2002; "Botox – My Perspective"; Skin Disease Education Foundation; Cosmetic Dermatology Seminar 2002; Coronado, California

May 2002; "Soft Tissue Augmentation: Bovine Collagen, Cosmoderm I & II – NST"; Skin Disease Education Foundation; Cosmetic Dermatology Seminar 2002; Coronado, California

May 2002; "Botulinum Toxin's"; Lecture followed by Botox Workshop, 6th Annual International Symposium on Aging Skin; Chicago, Illinois

May 2002; "Botox Workshop"; 6th Annual International Symposium on Aging Skin; Chicago, Illinois

June 2002; Press Conference: "Botulinum Toxin Course Overview and Presentation of the Topics on Hyaluronic Acids and Botulinum Toxin"; International Master Course on Aging Skin;; Paris, France

June 2002; Chairman of Session on: "The Three Main Indications: Glabella, Forehead-Eyebrow and Crow's Feet"; International Master Course on Aging Skin; Paris, France

June 2002; "Eyebrow Shaping, Crow's Feet and Rounding of the Eye with Botulinum Toxin"; International Master Course on Aging Skin; Paris, France

June 2002; Video Presentation: "Botulinum Toxin Injection of the Crow's Feet"; International Master Course on Aging Skin; Paris, France

July 2002; Chairman of Workshop: "Tissue Expansion and Soft Tissue Augmentation in Dermatology"; 20th World Congress of Dermatology Meeting; Paris, France

July 2002; "Overview - Soft Tissue Augmentation"; Tissue Expansion and Soft Tissue Augmentation in Dermatology, 20th World Congress of Dermatology Meeting; Paris, France

July 2002; "Collagens: From Animal to Human"; Tissue Expansion and Soft Tissue Augmentation in Dermatology, 20th World Congress of Dermatology Meeting; Paris, France

July 2002; "Botulinum Toxins"; Aesthetic Procedures in Dermatology, 20th World Congress of Dermatology Meeting; Paris, France

July 2002; "Advancing Facial Aesthetic Enhancement with Fillers"; Allergan Satellite, 20th World Congress of Dermatology Meeting; Paris, France

July 2002; "Achieving the Perfect Lip Correction Utilizing Zyplast Collagen and Hylaform Plus"; Inamed Workshop, 20th World Congress of Dermatology Meeting; Paris, France

July 2002; "Botulinum Toxin Aesthetic Forehead"; Botulinum Toxin Workshop, 20th World Congress of Dermatology Meeting; Paris, France

July 2002; "Botulinum Toxin: BOTOX Latest Techniques"; 19th Annual Superficial Anatomy & Cutaneous Surgery Course; San Diego, California

July 2002; "Botulinum Toxin: BOTOX Latest Techniques Live Demonstration"; 19th Annual Superficial Anatomy & Cutaneous Surgery Course; San Diego, California

August 2002; "Filling Agents"; Cosmetic Dermatology Course, 2002 American Academy of Dermatology Annual Summer Meeting; New York, New York

August 2002; "Soft Tissue Augmentation"; New Therapies Course, 2002 American Academy of Dermatology Annual Summer Meeting; New York, New York

August 2002; "Introduction, Diagnosis and Treatment of HIV Lipodystrophy"; 2002 American Academy of Dermatology Annual Summer Meeting; New York, New York

August 2002; Chairman of Session on: "Diagnosis and Treatment of HIV Lipodystrophy"; 2002 American Academy of Dermatology Annual Summer Meeting; New York, New York

August 2002; "An Evening of Beauty"; Allergan Dinner; San Diego, California

August 2002; "Botulinum Toxin: Aesthetic Forehead"; 2002 BOTOX and Fillers Conference; Vancouver, British Columbia

2002/07/27/2002



February 2003; "Soft Tissue Augmentation – In Search of the Perfect Lip"; 27th Annual Dermatology Seminar; Maui, Hawaii

February 2003; "Cosmeceuticals"; 27th Annual Dermatology Seminar; Maui, Hawaii

February 2003; "Botox – My Perspective"; 27th Annual Dermatology Seminar; Maui, Hawaii

February 2003; "An Evening of Beauty and Botox"; Allergan Dinner; Maui, Hawaii

March 2003; "Fillers: The Third Dimension"; American Academy of Dermatology Annual Seminar; San Francisco, California

March 2003; "Fillers: Adverse Reactions"; American Academy of Dermatology Annual Seminar; San Francisco, California

March 2003; "Botox: Complications"; American Academy of Dermatology Annual Seminar; San Francisco, California

March 2003; "Soft Tissue Augmentation: In Search of the Perfect Lip"; American Academy of Dermatology Annual Seminar; San Francisco, California

April 2003; "Soft Tissue Augmentation: In Search of the Perfect Lip"; Skin Disease Education Foundation; Phoenix, Arizona

May 2003; "Soft Tissue Augmentation: In Search of the Perfect Lip"; American Society for Aesthetic Plastic Surgery; Boston, Massachusetts

May 2003; "Cosmeceuticals"; American Society for Aesthetic Plastic Surgery; Boston, Massachusetts

June 2003; "Minimally Invasive Aesthetic"; Skin Medica Editor Luncheon; New York, New York

June 2003; "Introduction to Fillers & Biodegradable Fillers"; Facial Aesthetic Enhancements Education Initiative 2003 Satellite CME Summits; Los Angeles, California

June 2003; "Botox for Cosmetic Uses"; Facial Aesthetic Enhancements Education Initiative 2003 Satellite CME Summits; Los Angeles, California

June 2003; "Combination Therapy"; Facial Aesthetic Enhancements Education Initiative 2003 Satellite CME Summits; Los Angeles, California

June 2003; "Live Patient Demonstrations"; Facial Aesthetic Enhancements Education Initiative 2003 Satellite CME Summits; Los Angeles, California



February 2004; "Allergan Conference Marketing Meeting"; Miami, Florida

April 2004; "Allergan Conference Marketing Meeting"; New York, New York

June 2004; "Botox: The Latest Techniques"; Dr. Greenway's 21st Annual Conference: Superficial Anatomy and Cutaneous Surgery; La Jolla, California

July 2004; "Botox/Fillers"; American Academy of Dermatology; New York, New York

July 2004; "In Search of the Perfect Lip"; American Academy of Dermatology; New York, New York

July 2004; "Restylane"; Dinner Lecture/Demonstration; New York, New York

August 2004; "Botox"; American Society of Dermatologic Surgery regional meeting; Los Angeles, California

August 2004; "Fillers"; American Society of Dermatologic Surgery regional meeting; Los Angeles, California

October, 2004; "The Perfect Lip"; ASDS-ACMMSCO Combined Annual Meeting; San Diego, California

October, 2004; "Hot Topics-Fillers"; Injection/Demonstration ASDS-ACMMSCO Annual Meeting; San Diego, California

October, 2004; "Fillers"; Presentation, HH Skin Disease Foundation Meeting; South Beach, Florida

October, 2004; "Botox"; Presentation, HH Skin Disease Foundation Meeting; South Beach, Florida

October, 2004; "Botox & Fillers"; Injection/Demonstration, HH Skin Disease Foundation Meeting; South Beach, Florida

November, 2004; "Fillers: The Dawn of a New Millennium"; Injection/Demonstration Advances in Aesthetic Plastic Surgery: The Cutting Edge V; New York, New York

January, 2005; "Botox & Fillers"; 2nd Annual National Education Faculty (NEF) Consultant's Meeting; Las Vegas, Nevada

February, 2005; "In Search of the Perfect Filler"; Kiss & Tell Advanced Restylane Injection Techniques; Santa Monica, California

February, 2005; "In Search of the Perfect Lip"; American Academy of Dermatology; New Orleans, Louisiana





**CONFIDENTIALITY NOTICE:** This communication constitutes an electronic communication within the meaning of the Electronic Communications Privacy Act, 18 USC 2510, and its disclosure is strictly limited to the recipient intended by the sender of this message. This communication may contain confidential and privileged material for the sole use of the intended recipient and receipt by anyone other than the intended recipient does not constitute a loss of the confidential or privileged nature of the communication. Any review or distribution by others is strictly prohibited. If you are not the intended recipient please contact the sender by return electronic mail and delete all copies of this communication.

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**From:** Howard L. Weitzman [mailto:hweitzman@kwikalaw.com]  
**Sent:** Friday, July 24, 2009 10:13 PM  
**To:** Boyer, Bradley P.; Patricia Glaser  
**Cc:** L. Londell McMillan ; John Branca; Charnley, Richard L.  
**Subject:** FW: Letter From Dr. Arnold Klein's counsel

Mr. Boyer:

Please be advised that I represent John Branca and John McClain who are the Special Administrators of the Estate of Michael Jackson. Dr. Hoefflin is not authorized to speak on behalf of the Estate of Michael Jackson in any capacity be it public or private. Neither Mr. Branca or his firm represent Dr. Hoefflin. I have no information as to whether or not Dr. Hoefflin is authorized to speak on behalf of Katherine Jackson or any members of the Jackson family.

Howard

**Howard Weitzman, Esq.**  
Kinsella Weitzman Iser Kump & Aldisert  
808 Wilshire Blvd., 3rd. Floor, Santa Monica, CA 90401  
(310) 566-9811 Direct; (310) 566-9871 Fax; (310) 308-4111 Cell  
[hweitzman@kwikalaw.com](mailto:hweitzman@kwikalaw.com)

EXH B

---

**From:** Hansell, Dean <DHansell@deweyleboeuf.com>  
**To:** Boyer, Bradley P.  
**Cc:** Schreiber, John <jschreiber@DeweyLeBoeuf.com>; McMillan, L. Londell <LMcMillan@deweyleboeuf.com>  
**Sent:** Mon Jul 27 19:04:23 2009  
**Subject:** RE: Letter From Dr. Arnold Klein's counsel

Mr. Boyer,

Londell McMillan is tied up and has asked that i respond to your email.

Dr. Hoeflin is not authorized to speak for Mrs. Jackson in any respect. Moreover, we have no information that Hoeflin is authorized to speak on behalf of any family member.

If you or your client need to communicate with Mrs. Jackson, you must do so through our firm.

Dean Hansell

---

Dean Hansell  
Partner  
Dewey & LeBoeuf LLP  
333 South Grand Avenue, Suite 2600  
Los Angeles, CA 90071  
Direct: +1 213 621 6031  
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Mobile: +1 213 400 5990  
[dhansell@dl.com](mailto:dhansell@dl.com)  
[www.dl.com](http://www.dl.com)

DL

---

**From:** Howard L. Weitzman [mailto:HWeitzman@kwikalaw.com]  
**Sent:** Saturday, August 01, 2009 2:50 PM  
**To:** Charnley, Richard L.  
**Subject:** RE: CORRESPONDENCE FROM ARNOLD LKEIN'S COUNSEL

Mr. Charnley:

Please understand neither I or any of the lawyers that are working on behalf of the Estate of Michael Jackson represent Katherine Jackson or any other members of the Jackson family. We represent the Special Administrators of the Estate of Michael Jackson and in that sense represent the Estate. As I told Dr. Klein last week, Dr. Hoefflin **DOES NOT** speak for the Estate, is **not authorized** to speak for the Estate, nor do we condone his making public statements about Dr. Klein. We do not know the truth of whatever it is Dr. Hoefflin has publicly said about Dr. Klein but whatever those statements are they were not made with authorization by the Estate or the Special Administrators.



**Charnley, Richard L.**

---

**From:** Hansell, Dean [DHansell@deweyleboeuf.com]  
**Sent:** Monday, August 03, 2009 5:19 PM  
**To:** Charnley, Richard L.  
**Subject:** Dr. Hoefflin

Dear Mr. Charnley:

I write in response to your email of this weekend to my partner Londell McMillan. As we previously advised you and as I notified your partner Bradley Boyer on July 27 to our knowledge Mrs. Jackson has not authorized Dr. Hoefflin to speak on her or their behalf with respect to Michael Jackson's death. Also, to be clear, we do not represent Dr. Hoefflin.

Please feel free to call me if you have any questions concerning this.

---

Dean Hansell  
Partner  
Dewey & LeBoeuf LLP  
333 South Grand Avenue, Suite 2600  
Los Angeles, CA 90071  
Direct: +1 213 621 6031  
General: +1 213 621 6000  
Fax: +1 213 621 6100  
Mobile: +1 213 400 5990  
[dhansell@dl.com](mailto:dhansell@dl.com)  
[www.dl.com](http://www.dl.com)

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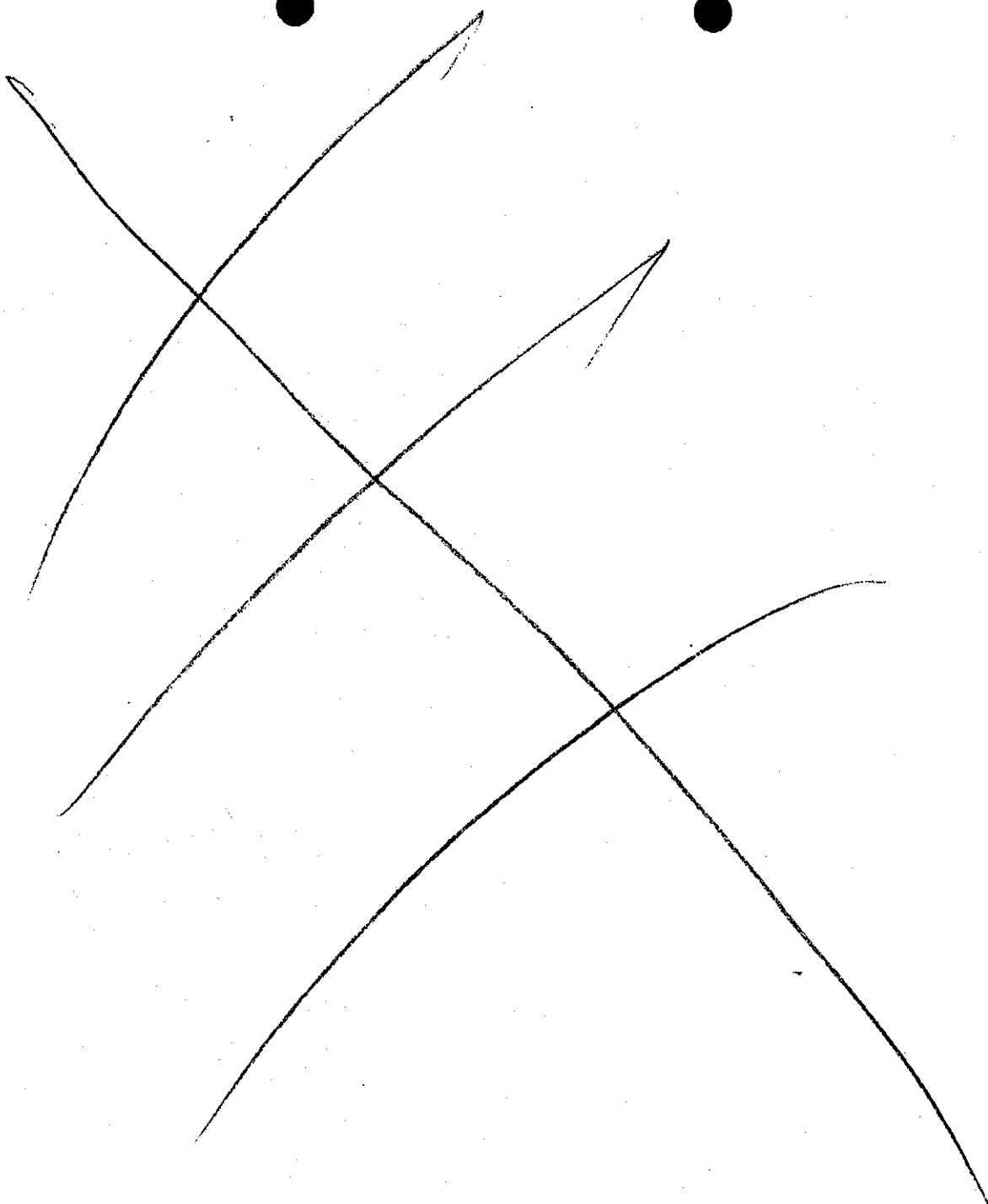
Pursuant to U.S. Treasury Department Circular 230, unless we expressly state otherwise, any tax advice contained in this communication (including any attachments) was not intended or written to be used, and cannot be used, for the purpose of (i) avoiding tax-related penalties or (ii) promoting, marketing or recommending to another party any matter(s) addressed herein.

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9/11/2009



**EXHIBIT "C"**



## Football

Exclusive

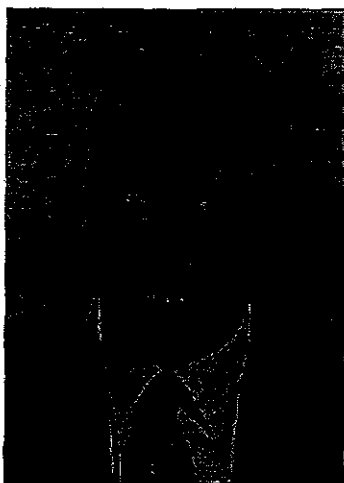
# Jacko 'dead 47 mins' as doc made 3 calls

By DAVID WILLETTS  
in Los Angeles

Published: 26 Aug 2009

**MICHAEL Jackson's doctor Conrad Murray was accused last night of spending 47 minutes phoning another medic, a lawyer and a mystery associate after the star stopped breathing.**

Panicking Murray rang fellow doc Arnold Klein for advice on what to do as Jacko lay dying.

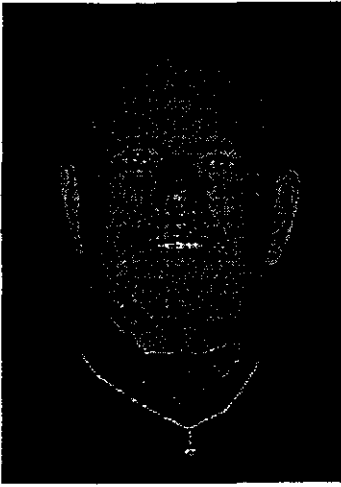


Police probe ... Conrad Murray

He also allegedly called a **LAWYER** before finally telling a security guard to dial 911 and summon paramedics to the star's Los Angeles home.

Both Murray and Klein are being investigated by police over their role in Jacko's death, which is being treated as homicide.

Murray has claimed he tried to revive the star, but leaked court papers reveal he spent 47 minutes making three separate phone calls around the time Jacko died.



Drugs riddle ... Dr Arnold Klein

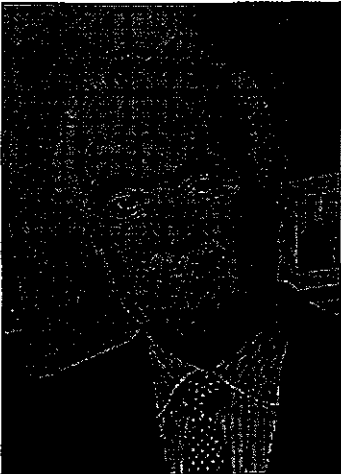
And last night Dr Steven Hoefflin - who treated Jacko for 25 years - said: "Murray definitely called Klein because Klein taught him how to administer propofol.

"There were two in-state calls then one out-of-state. He was calling an attorney - he had to because Michael was dead.

"He tried to cover it up by telling everyone Michael had a weak pulse, but Michael was dead."

**Lethal**

Dr Hoefflin, 63, a respected plastic surgeon who is carrying out his own probe into Jacko's death, added: "Murray would have counted on Klein to be the source of propofol and guide him in its use."



Probe ... Dr Steven Hoefflin

TOM VICKERS

EXH C

Skin specialist Klein is being probed for giving potentially lethal prescription drugs to addict Jacko.

Murray has admitted giving the star **FOUR** different painkillers, including propofol, on the night he died. But he never told paramedics he had administered the knock-out dose of propofol, drastically undermining their attempt to save Jacko.

The leaked warrant also reveals Klein has ignored a subpoena demanding he hand over his records.

Murray's lawyer last night claimed much of the affidavit was "police theory" and contained inaccuracies.

Court papers show Jacko, 50, had "lethal levels" of propofol when he died in June. The drug is used to anaesthetise patients for major ops. Authorities have demanded records from at least five doctors, but only Murray is named as the target of a manslaughter probe.

[d.willetts@the-sun.co.uk](mailto:d.willetts@the-sun.co.uk)

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## my View

By PROF SIMON MAXWELL

Edinburgh University drugs expert

THIS combination of drugs is definitely outside the normal bounds of medical practice.

They were administered in a totally inappropriate setting.

In effect Michael Jackson was given FIVE sedatives as the fourth, propofol, was diluted in lidocaine.

Valium, lorazepam and midazolam are drugs that depress the activity of the brain. Propofol is usually used in general anaesthetics, while lidocaine is used as a local anaesthetic but is only injected rarely.

Administering a sedative is one of the most hazardous procedures any doctor is asked to undertake.

Among the many questions Dr Murray has to answer is why he proceeded with doing this when clearly specialist care was needed.

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ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State number, and address):  
RICHARD L. CHARNLEY (SBN 70430) BRADLEY P. BOYER (SBN 179430)  
Ropers Majeski Kohn & Bentley  
515 South Flower Street, Suite 1100  
Los Angeles, CA 90071  
TELEPHONE NO.: (213) 312-2000 FAX NO.: (213) 312-2001  
ATTORNEY FOR (Name): Plaintiff, ARNOLD W. KLEIN, M.D.

FOR COURT USE ONLY

**FILED**  
LOS ANGELES SUPERIOR COURT

SEP 14 2009

JOHN A. CLARKE, Clerk

BY DAWN ALEXANDER, DEPUTY

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES  
STREET ADDRESS: 111 North Hill Street  
MAILING ADDRESS: 111 North Hill Street  
CITY AND ZIP CODE: Los Angeles, CA 90071  
BRANCH NAME: Central Branch

CASE NAME: KLEIN vs. HOEFFLIN

**CIVIL CASE COVER SHEET**  
 **Unlimited** (Amount demanded exceeds \$25,000)  
 **Limited** (Amount demanded is \$25,000 or less)

**Complex Case Designation**  
 **Counter**  **Joinder**  
Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

CASE NUMBER: **BC421181**  
JUDGE:  
DEPT:

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

**Auto Tort**

- Auto (22)
- Uninsured motorist (46)
- Other P/PI/D/W/D (Personal Injury/Property Damage/Wrongful Death) Tort**
- Asbestos (04)
- Product liability (24)
- Medical malpractice (45)
- Other P/PI/D/W/D (23)

**Non-P/PI/D/W/D (Other) Tort**

- Business tort/unfair business practice (07)
- Civil rights (08)
- Defamation (13)
- Fraud (16)
- Intellectual property (19)
- Professional negligence (25)
- Other non-P/PI/D/W/D tort (35)
- Employment**
- Wrongful termination (36)
- Other employment (15)

**Contract**

- Breach of contract/warranty (06)
- Rule 3.740 collections (09)
- Other collections (09)
- Insurance coverage (18)
- Other contract (37)

**Real Property**

- Eminent domain/Inverse condemnation (14)
- Wrongful eviction (33)
- Other real property (26)

**Unlawful Detainer**

- Commercial (31)
- Residential (32)
- Drugs (38)

**Judicial Review**

- Asset forfeiture (05)
- Petition re: arbitration award (11)
- Writ of mandate (02)
- Other judicial review (39)

**Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)**

- Antitrust/Trade regulation (03)
- Construction defect (10)
- Mass tort (40)
- Securities litigation (28)
- Environmental/Toxic tort (30)
- Insurance coverage claims arising from the above listed provisionally complex case types (41)

**Enforcement of Judgment**

- Enforcement of judgment (20)

**Miscellaneous Civil Complaint**

- RICO (27)
- Other complaint (not specified above) (42)

**Miscellaneous Civil Petition**

- Partnership and corporate governance (21)
- Other petition (not specified above) (43)

2. This case  is  is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:

- a.  Large number of separately represented parties
- b.  Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve
- c.  Substantial amount of documentary evidence
- d.  Large number of witnesses
- e.  Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
- f.  Substantial postjudgment judicial supervision

3. Remedies sought (check all that apply): a.  monetary b.  nonmonetary; declaratory or injunctive relief c.  punitive

4. Number of causes of action (specify): 6

5. This case  is  is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: September 14, 2009

BRADLEY P. BOYER

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

**NOTICE**

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

SHORT TITLE: ARNOLD W. KLEIN, M.D. vs. STEVEN HOEFFLIN, M.D.

CASE NUMBER

BC 421181

**CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION  
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

**This form is required pursuant to LASC Local Rule 2.0 in all new civil case filings in the Los Angeles Superior Court.**

Item I. Check the types of hearing and fill in the estimated length of hearing expected for this case:

JURY TRIAL?  YES CLASS ACTION?  YES LIMITED CASE?  YES TIME ESTIMATED FOR TRIAL 3  HOURS/  DAYS.

Item II. Select the correct district and courthouse location (4 steps - If you checked "Limited Case", skip to Item III, Pg. 4):

**Step 1:** After first completing the Civil Case Cover Sheet Form, find the main civil case cover sheet heading for your case in the left margin below, and, to the right in Column A, the Civil Case Cover Sheet case type you selected.

**Step 2:** Check one Superior Court type of action in Column B below which best describes the nature of this case.

**Step 3:** In Column C, circle the reason for the court location choice that applies to the type of action you have checked. For any exception to the court location, see Los Angeles Superior Court Local Rule 2.0.

**Applicable Reasons for Choosing Courthouse Location (see Column C below)**

1. Class Actions must be filed in the County Courthouse, Central District.
2. May be filed in Central (Other county, or no Bodily Injury/Property Damage).
3. Location where cause of action arose.
4. Location where bodily injury, death or damage occurred.
5. Location where performance required or defendant resides.
6. Location of property or permanently garaged vehicle.
7. Location where petitioner resides.
8. Location wherein defendant/respondent functions wholly.
9. Location where one or more of the parties reside.
10. Location of Labor Commissioner Office.

**Step 4:** Fill in the information requested on page 4 in Item III; complete Item IV. Sign the declaration.

	<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
<b>Auto Tort</b>	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
	Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death - Uninsured Motorist	1., 2., 4.
<b>Other Personal Injury/Property Damage/Wrongful Death Tort</b>	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage	2.
		<input type="checkbox"/> A7221 Asbestos- Personal Injury/Wrongful Death	2.
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
	Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons	1., 2., 4.
		<input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 2., 4.
Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1., 2., 4.	
	<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1., 2., 4.	
	<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress	1., 2., 3.	
	<input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 2., 4.	
<b>Non-Personal Injury/Property Damage/Wrongful Death Tort</b>	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 2., 3.
	Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
	Defamation (13)	<input checked="" type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
	Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.

Non-Personal Injury/Property Damage/  
Wrongful Death Tort (Cont'd.)

SHORT TITLE: ARNOLD W. KLEIN, M.D. vs. STEVEN HOEFFLIN, M.D.	CASE NUMBER
--	-------------

Employment

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons -See Step 3 Above
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3. 1., 2., 3.
Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2., 3.
Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1., 2., 3. 10.

Contract

Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not Unlawful Detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2., 5. 2., 5. 1., 2., 5. 1., 2., 5.
Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5., 6 2., 5.
Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 5. 1., 2., 3., 5. 1., 2., 3., 8.

Real Property

Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation      Number of parcels _____	2.
Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2, 6.
Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6060 Other Real Property(not eminent domain, landlord/tenant, foreclosure)	2., 6. 2, 6. 2., 6.

Judicial Review Unlawful Detainer

Unlawful Detainer- Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer- Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer- Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2, 6.
Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2., 6.
Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.

<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2., 8. 2. 2.
Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2., 8.
Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1., 2., 8.
Construction Defect (10)	<input type="checkbox"/> A6007 Construction defect	1., 2., 3.
Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1., 2., 8.
Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.
Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.
Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1., 2., 5., 8.
Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment <input type="checkbox"/> A6160 Abstract of Judgment <input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations) <input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes) <input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax <input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 9. 2., 6. 2., 9. 2., 8. 2., 8. 2., 8., 9.
RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1., 2., 8.
Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only <input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment) <input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex) <input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1., 2., 8. 2., 8. 1., 2., 8. 1., 2., 8.
Partnership Corporation Governance(21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2., 8.
Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment <input type="checkbox"/> A6123 Workplace Harassment <input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case <input type="checkbox"/> A6190 Election Contest <input type="checkbox"/> A6110 Petition for Change of Name <input type="checkbox"/> A6170 Petition for Relief from Late Claim Law <input type="checkbox"/> A6100 Other Civil Petition	2., 3., 9. 2., 3., 9. 2., 3., 9. 2. 2., 7. 2., 3., 4., 8. 2., 9.

Judicial Review (Cont'd.)

Provisionally Complex  
Litigation

Enforcement  
of Judgment

Miscellaneous Civil  
Complaints

Miscellaneous Civil  
Petitions

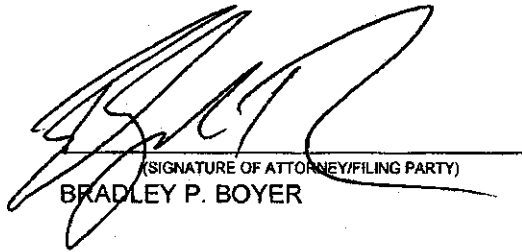
SHORT TITLE: ARNOLD W. KLEIN, M.D. vs. STEVEN HOEFFLIN, M.D.	CASE NUMBER
--	-------------

Item III. Statement of Location: Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., Step 3 on Page 1, as the proper reason for filing in the court location you selected.

REASON: CHECK THE NUMBER UNDER COLUMN C WHICH APPLIES IN THIS CASE			ADDRESS: Defamation Case - may be filed in Central District
<input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.			533 S. Windsor st.
CITY: Los Angeles	STATE: CA	ZIP CODE: 90020	

Item IV. Declaration of Assignment: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that the above-entitled matter is properly filed for assignment to the Central courthouse in the Central District of the Los Angeles Superior Court (Code Civ. Proc., § 392 et seq., and LASC Local Rule 2.0, subds. (b), (c) and (d)).

Dated: September 14, 2009

  
 (SIGNATURE OF ATTORNEY/FILING PARTY)  
 BRADLEY P. BOYER

**PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:**

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet form CM-010.
4. Complete Addendum to Civil Case Cover Sheet form LACIV 109 (Rev. 01/07), LASC Approved 03-04.
5. Payment in full of the filing fee, unless fees have been waived.
6. Signed order appointing the Guardian ad Litem, JC form FL-935, if the plaintiff or petitioner is a minor under 18 years of age, or if required by Court.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

LASC