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14	UNITED STATES DISTRICT COURT				
	CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION				
15	CENTRAL DISTRICT OF CAL	IFORNIA, WE	STERN DIVISION		
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	VANESSA BRYANT,	CASE NO. 2:	20-cv-09582-JFW-E		
16		CASE NO. 2:			
16 17	VANESSA BRYANT,	CASE NO. 2: JOINT STAT CASE	20-cv-09582-JFW-E EMENT OF THE		
16 17 18	VANESSA BRYANT, Plaintiff,	CASE NO. 2: JOINT STAT CASE	20-cv-09582-JFW-E		
16 17 18 19	VANESSA BRYANT,  Plaintiff,  v.	CASE NO. 2:  JOINT STAT CASE  Pretrial Conf.: Time:	<b>20-cv-09582-JFW-E EMENT OF THE</b> February 4, 2022 8:00 a.m.		
16 17 18 19 20	VANESSA BRYANT,  Plaintiff,  v.  COUNTY OF LOS ANGELES, et al.,	CASE NO. 2:  JOINT STAT CASE  Pretrial Conf.:	20-cv-09582-JFW-E EMENT OF THE February 4, 2022		
16 17 18 19 20 21	VANESSA BRYANT,  Plaintiff,  v.  COUNTY OF LOS ANGELES, et al.,	CASE NO. 2:  JOINT STAT CASE  Pretrial Conf.: Time:  Trial Date: Time:	<b>20-cv-09582-JFW-E EMENT OF THE</b> February 4, 2022 8:00 a.m.  February 22, 2022		
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Pursuant to the Court's Amended Scheduling and Case Management Order, entered in this case on June 4, 2021 (Dkt. 86), Plaintiff Vanessa Bryant and Defendants County of Los Angeles, Los Angeles County Sheriff's Department, Los Angeles County Fire Department, Joey Cruz, Rafael Mejia, Michael Russell, and Raul Versales hereby submit the following joint statement of the case to be read to the jury prior to the commencement of voir dire:

## STATEMENT OF THE CASE

On the morning of Sunday, January 26, 2020, Plaintiff Vanessa Bryant's husband, Kobe Bryant, and thirteen-year-old-daughter, Gianna Bryant, were flying by helicopter to Thousand Oaks, California, where Gianna Bryant was set to play in a youth basketball tournament. At approximately 9:45 a.m., the helicopter crashed into a hillside in Calabasas, California, killing Kobe, Gianna, and everyone else onboard. Defendants were not responsible for the crash itself. Employees of the Los Angeles County Sheriff's Department and Los Angeles County Fire Department responded to the crash scene.

In this lawsuit, Plaintiff Vanessa Bryant alleges that, following the crash, employees of the Los Angeles County Sheriff's Department and Los Angeles County Fire Department took photos of Kobe and Gianna Bryant's bodies without any legitimate purpose. Plaintiff further alleges that employees of the Sheriff's and Fire Departments sent and displayed photos of Kobe and Gianna Bryant's bodies to other individuals who had no legitimate purpose for seeing or having them, including members of the public. Mrs. Bryant alleges that, as a result of Defendants' conduct, she suffered emotional distress and is entitled to damages.

Defendants contend this case is not about the tragic helicopter crash that killed Kobe Bryant and Gianna Bryant, and seven other individuals on board. Defendants contend this case is about first responders who responded to the helicopter crash, worked to control fires, and setup a perimeter to keep media, hikers, bikers and fans from the crash site. Defendants further contend that the first

1	responders took and shared photographs of the crash site as part of doing their jobs				
2	and that none of the crash scene photos taken by County employees were publicly				
3	disseminated. Defendants assert their actions did not violate any of Plaintiff's rights				
4	or cause her emotional distress; and that Plaintiff is not entitled to any damages.				
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7	DATED: February 1, 2022		SON SONSINI GOODRICH & ROSATI,		
8		PC			
9					
10		By:	/s/ Luis Li		
11		J	LUIS LI		
12		Attor	rneys for Plaintiff Vanessa Bryant		
13		711101	neys for Frament Vanessa Bryant		
14	DATED: February 1, 2022	OFFI	ICE OF COUNTY COUNSEL		
15	DATED. Peditary 1, 2022	Oltri	ICE OF COUNTY COUNSEL		
16					
17		By:	/s/ Jonathan McCaverty		
18			JONATHAN C. McCAVERTY		
19			Attorneys for Defendant		
20			LOS ANGELES COUNTY SHERIFF'S DEPARTMENT		
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1	DATED: February 1, 2022	MILLER BARONDESS, LLP
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3		By: /s/ Jason Tokoro
4 5		JASON H. TOKORO
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8		ANGELES COUNTY FIRE DEPARTMENT, JOEY CRUZ, RAFAEL
9		MEJIA, MICHAEL RUSSELL, and
10		RAUL VERSALES
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		3 Case No. 2:20-cv-09582-JFW-E

**FILER ATTESTATION** I, Luis Li, attest under Local Rule 5-4.3.4(a)(2)(i) that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized this filing. Dated: February 1, 2022 /s/ Luis Li Luis Li