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By A. Mejia, Deputy Clerk

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **COUNTY OF LOS ANGELES**

11 SHAWN CARTER,

12 Plaintiff,

13 vs.

14 THE BUZBEE LAW FIRM,
ANTHONY G. BUZBEE,

15 Defendants.
16

Case No. 24SMCV05637

**SUPPLEMENTAL DECLARATION OF
CHARLOTTE HENDERSON IN
SUPPORT OF PLAINTIFF SHAWN
CARTER'S EX PARTE APPLICATION
TO SUPPLEMENT THE RECORD OR
OBTAIN DISCOVERY IN CONNECTION
WITH DEFENDANTS' SPECIAL
MOTION TO STRIKE**

17 Judge: Hon. Mark H. Epstein
Location: Department I

18 Initial Hearing Date: February 25, 2025
19 Complaint Filed: November 18, 2024

1 transcript and the recording and confirm the transcript accurately reflects the recorded interview
2 and that the recording accurately reflects the conversation that I and James Robert Butler (another
3 investigator who was present with me) had with Ms. Doe on February 21, 2025.

4 9. I was provided with and reviewed the “Second Declaration of Jane Doe in
5 Response to Shawn Carter’s Proffer of New Evidence at Hearing on Defendants’ Special Motion
6 to Strike Portions of Plaintiff’s First Amended Complaint,” signed March 6, 2025 and filed March
7 11, 2025. I was surprised to read that Ms. Doe characterized my declaration as “almost entirely
8 false,” especially considering my declaration detailed the exact statements Ms. Doe made when I
9 spoke with her, and that her statements are memorialized in the recorded interview and transcript.

10 10. In the following paragraphs, I identify her disputes with my declaration, and
11 necessarily, with what she said during our in-person conversation. I clear the record about what
12 she said to me and Mr. Butler.

13 11. In paragraph 8 of Ms. Doe’s declaration, she claims that she told both me and Mr.
14 Butler that we needed “to leave” as soon as she had figured out who we were.

15 a. In claiming that she told us to leave, Ms. Doe is lying. As the transcript of
16 our conversation confirms, not once in the entire 15-page transcript does she tell us “to
17 leave” or use any words to that effect.

18 b. Rather, as the transcript reflects, Ms. Doe spoke openly and willingly with
19 us and freely answered our questions. She was free to leave, go back inside her home at
20 any point, and end the conversation. She chose not to.

21 12. In paragraph 9(c) of Ms. Doe’s declaration, she claims that she never told me
22 anything about the facts in paragraph 9(c) of my declaration, which states: “Ms. Doe met Mr.
23 Buzbee for the first time in Houston, Texas. He paid to fly her there. Their meeting to discuss the
24 case took place when Ms. Doe flew out for an interview that Mr. Buzbee had arranged for Ms.
25 Doe to give to NBC News in Mr. Buzbee’s office.”

26 a. In denying that she said that to me, Ms. Doe is lying. As the transcript of
27 our conversation confirms, Ms. Doe told me: “He flew me out to...Houston...he paid for
28

1 it...The first time I met him was in a coffee shop...in Houston...we talked about what all
2 was going to go through and what all had happened.” Ex. A at 5:24–5.

3 b. Ms. Doe further said to me that “Tony,” which I understood in this context
4 to refer to Anthony Buzbee, set up the interview with NBC, that it took place “in Tony
5 Buzbee’s office in Houston,” and that “it was the same time, he flew me out” as when
6 they’d met in the coffee shop. *Id.* at 9:22–10:8.

7 13. In paragraph 9(d) of Ms. Doe’s declaration, she disputes that she told me that Mr.
8 Carter did not sexually assault her. Ms. Doe is lying. She told me that. Several times. As the
9 transcript of our conversation confirms, Ms. Doe made the following statements to me about Mr.
10 Carter during our conversation:

11 Charlotte Henderson: But Jay-Z had nothing to do with this, correct?

12 Ms. Doe: Right. (*Id.* at 10:21–23.)

13 Charlotte Henderson: Other than he was at the party that you were at. So I
14 mean, he did not assault you?

15 Ms. Doe: No. (*Id.* at 10:24–11:1.)

16 Charlotte Henderson: He was just there, but he didn’t have anything to do
17 with any sexual acts towards you, it was strictly --?

18 Ms. Doe: Yeah. (*Id.* at 9:2–4.)

19 Charlotte Henderson: Yeah, and we’re not dismissing the fact that
20 something happened to you. That has nothing to do with, but we just want
21 to clarify that Jay-Z did not have anything to do with it. And that he didn’t
22 sexually assault you.

23 James Robert Butler: Is that, is that a fair assessment?

24 Ms. Doe: Yeah. (*Id.* at 13:24–14:5.)

25 14. In paragraph 9(e) of Ms. Doe’s declaration, she claims that she never made any
26 such statements to me about the facts in paragraph 9(e) of my declaration, which states: “Jane Doe
27 stated to me that she originally told Mr. Buzbee that she had been raped by Sean Combs and a
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1 world-renowned female celebrity was also present for the assault, and that Mr. Buzbee suggested
2 that she claim that Mr. Carter was another rapist.”

3 a. In denying that she said that to me, Ms. Doe is lying.

4 b. As the transcript of our conversation confirms, Ms. Doe told me: “It was
5 more Diddy, but Buzbee brought Jay-Z into it...He asked if Jay-Z was there, I said,
6 yes...’cause it started out, it was just Diddy and [the female celebrity], and then Jay-Z
7 came in.” Mr. Butler then asked her “but not from your mouth” and Ms. Doe responded
8 “yeah.” (*Id.* at 8:11–21.)

9 15. In paragraph 9(f) of Ms. Doe’s declaration, she claims that she never made any
10 such statements to me about the facts in paragraph 9(f) of my declaration, which states: “Jane Doe
11 stated “Buzbee brought Jay Z into it,” and “he was the one that kind of pushed me towards going
12 forward with him, with Jay-Z.”

13 a. In denying that she said that to me, Ms. Doe is lying. As the transcript of
14 our conversations confirms, Ms. Doe told me: “It was more Diddy, but Buzbee brought
15 Jay-Z into it.” (*Id.* at 8:11–12.)

16 b. Ms. Doe then made the following statements to me about Mr. Buzbee
17 during our conversation:

18 Ms. Doe: He was the one that kind of pushed me towards going forward
19 with him, with Jay-Z.

20 Charlotte Henderson: With Jay-Z? Buzbee did?

21 Ms. Doe: yeah. (*Id.* at 9:11–14.)

22 16. In paragraph 9(g) of Ms. Doe’s declaration, she claims that she never made any
23 such statements to me about the facts in paragraph 9(g) of my declaration, which states: “Jane Doe
24 said that Mr. Buzbee asked her if Mr. Carter had been at the party. Ms. Doe told Mr. Buzbee that
25 Mr. Carter was at the party but she told me that Mr. Carter did not take part in any sexual assault
26 of Ms. Doe.”

27 a. In denying that she said that to me, Ms. Doe is lying.

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1 b. As the transcript of our conversation confirms, Ms. Doe made the following
2 statements during our conversation:

3 Ms. Doe: It was more Diddy, but Buzbee brought Jay-Z into it.

4 James Robert Butler: See, now, if you don't mind, can you explain that?

5 'Cause that's kind of the –

6 Ms. Doe: He asked if Jay-Z was there, I said, yes.

7 James Robert Butler: So when you originally sat down at the coffee shop,
8 you told him that Diddy did something to you?

9 Ms. Doe: Yes, 'cause it started out, it was just Diddy and [the female
10 celebrity], and then Jay-Z came in.

11 James Robert Butler: But not from your mouth?

12 Ms. Doe: Yeah.

13 James Robert Butler: He asked you about Jay-Z?

14 Ms. Doe: Yeah.

15 James Robert Butler: But Jay-Z, was you're saying he was definitely there?
16 But he had no part in it, or he was just –

17 Ms. Doe: He was there.

18 Charlotte Henderson: He was just there, but he didn't have anything to do
19 with any sexual acts towards you, it was strictly –

20 Ms. Doe: Yeah. (*Id.* at 8:11–9:4.)

21 17. In paragraph 9(h) of Ms. Doe's declaration, she claims that she never made any
22 such statements to me about the facts in my declaration, paragraph 9(h), which states: "Jane Doe
23 confirmed the following regarding Mr. Carter during our interview: i. 'Jay-Z had nothing to do
24 with this, correct? Right.' ii. 'Other than he was at the party that you were at. So I mean, he did
25 not assault you? No.' iii. 'He was just there, but he didn't have anything to do with any sexual
26 acts towards you? Yeah.'"

27 a. In denying that she said these statements to me, Ms. Doe is lying.

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1 b. As the transcript of our conversation confirms, Ms. Doe made each of these
2 three statements verbatim. *See Id.* at 9:2–11:1. She reiterated that Mr. Carter did not
3 assault her, again at the end of our conversation as follows:

4 Charlotte Henderson: Yeah, and we’re not dismissing the fact that
5 something happened to you. That has nothing to do with, but we just want
6 to clarify that Jay-Z did not have anything to do with it. And that he didn’t
7 sexually assault you.

8 James Robert Butler: Is that, is that a fair assessment?

9 Ms. Doe: Yeah. (*Id.* at 13:24–14:5.)

10 18. In paragraph 9(i) of Ms. Doe’s declaration, she claims that she never made any
11 such statements to me about the facts in paragraph 9(i) of my declaration, which states: “Jane Doe
12 said to me that lawyers at Mr. Buzbee’s law firm told her that, if she pursued Mr. Carter, she
13 would get a payout.”

14 a. In denying that she said that to me, Ms. Doe is lying.

15 b. As the transcript of our conversation confirms, Ms. Doe made the following
16 statements during our conversation:

17 James Robert Butler: Did they ever promise you money, or they just said,
18 we’ll see what happens, or?

19 Ms. Doe: Well, they said that I would get a payout, but I already knew that
20 that was not 100% accurate. (*Id.* at 7:17–21.)

21 19. In paragraph 9(j) of Ms. Doe’s declaration, she claims that she never made any
22 such statements to me about the facts in paragraph 9(j) of my declaration, which states: “Ms. Doe
23 said to me that, shortly before Mr. Buzbee dismissed the lawsuit against Mr. Carter, Mr. Buzbee
24 told Ms. Doe that Mr. Carter was threatening to kill her in response to her lawsuit and could come
25 after her. Upon hearing that, Ms. Doe agreed to drop her case.”

26 a. In denying that she said that to me, Ms. Doe is lying.

27 b. As the transcript of our conversation confirms, Ms. Doe made the following
28 statements during our conversation:

1 James Robert Butler: Okay, why did it now get dropped?
2 Ms. Doe: ‘Cause I was too scared to go forward with it. They told me he was
3 threatening to kill me, Jay-Z was threatening.
4 Charlotte Henderson: Who told you that?
5 Ms. Doe: They told me Jay-Z was threatening to kill me.
6 James Robert Butler: Who?
7 Charlotte Henderson: Who told you that?
8 Ms. Doe: The lawyers.
9 James Robert Butler: The lawyers did?
10 Charlotte Henderson: Buzbee?
11 Ms. Doe: Yeah, he said that there were threats against my life, and that saying
12 anything else could get me in a lot of trouble, that he could come after me.
13 (*Id.* at 6:9–21.)
14 20. In paragraph 10 of Ms. Doe’s declaration, she claims that she never stated (whether
15 once or four times) that Mr. Carter did not assault me. In denying that she said that to me, Ms.
16 Doe is lying. As the transcript of our conversation confirms, Ms. Doe made the following four
17 statements during our conversation:
18 Charlotte Henderson:…But Jay-Z had nothing to do with this, correct?
19 Ms. Doe: Right. (*Id.* at 10:21–23.)
20 Charlotte Henderson: Other than he was at the party that you were at. So I mean, he
21 did not assault you?
22 Ms. Doe: No. (*Id.* at 10:24–11:1.)
23 Charlotte Henderson: He was just there, but he didn’t have anything to do with any
24 sexual acts towards you, it was strictly --?
25 Ms. Doe: Yeah. (*Id.* at 9:2–4.)
26 Charlotte Henderson: Yeah, and we’re not dismissing the fact that something
27 happened to you. That has nothing to do with, but we just want to clarify that Jay-Z
28 did not have anything to do with it. And that he didn’t sexually assault you.

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James Robert Butler: Is that, is that a fair assessment?

Ms. Doe: Yeah. (*Id.* at 13:24–14:5.)

21. In paragraph 10 of Ms. Doe’s declaration, she claims that I called out “[Ms. Doe], we’re trying to help you,” and to that, she responded “how does this help me?” Ms. Doe accuses me of completely twisting and misrepresenting the context of her words when I stated the following in paragraph 9 of my declaration: “After Ms. Doe had voluntarily and consistent affirmed this, we inquired whether she would be open to signing an affidavit reflecting what she had told us. She responded by saying ‘But how does this help me?’”

a. In denying that she said that to me in this context, Ms. Doe is lying.

b. As the transcript of our conversation confirms, Ms. Doe made the following statements during our conversation after the fourth time reiterating Mr. Carter did not assault her:

Charlotte Henderson: That’s all we need, that’s all we want. And that’s all we want to do is just ask you about that. And if you’re willing to sign an affidavit to the fact that Jay-Z had nothing to do with it.

James Robert Butler: And that’s all it would say. It’s not going to say anything else about anything else that happened to you that night. Just that he was not a participant. Then, when they go forward—it’s because they have a problem with other folks now. Because they basically, they’re trying to make up things against their client. So they’re going to look to go after them. And they can leave your name out of it as a Jane Doe with cooperation. Because then there’s no reason to include you. Because we do think you’re kind of a victim. We think they kinda took advantage of you.

Ms. Doe: But how does this help me? (*Id.* at 14:7–20.)

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on March 14, 2025, at Montgomery, Alabama.



Charlotte Henderson

EXHIBIT A

Interview of [REDACTED] [REDACTED] on February 21, 2025

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1 [Birds Chirping] [Footseps] [Knocking on door] [Dog barking]

2 [REDACTED] [REDACTED]: Hi, how can I help y'all?

3 CHARLOTTE HENDERSON: Hey, how are you?

4 [REDACTED] [REDACTED]: Good, how are you?

5 CHARLOTTE HENDERSON: Uh oh, puppy. Can you step out for a second
6 or can you--I don't want him to bite us.

7 [REDACTED] [REDACTED]: Oh, he doesn't bite.

8 CHARLOTTE HENDERSON: Oh, Okay.

9 [REDACTED] [REDACTED]: How can I help y'all?

10 JAMES ROBERT BUTLER: How's everything? [REDACTED]

11 [REDACTED] [REDACTED]: Yeah.

12 JAMES ROBERT BUTLER: How you doing, my name is Robert, this is
13 Charlotte. We just came to kind of talk to you real quick, kind of run
14 a couple things by you. We just kinda wanted to see what was going on.
15 I know there's kind of a court case going, and it has since gone away.

16 [REDACTED] [REDACTED]: Yeah.

17 JAMES ROBERT BUTLER: So we're just here trying to figure out what
18 happened with that. We're actually thinking that you might have been
19 taken advantage of a little bit by maybe an attorney, does that sound
20 like something maybe that?

21 [REDACTED] [REDACTED]: Who are you guys?

22 CHARLOTTE HENDERSON: We're not here to hurt you or anything, we
23 just want to talk.

24 [REDACTED] [REDACTED]: How did you find out where I am? How did you
25 find out who I am?

1 JAMES ROBERT BUTLER: Well, based on the interview, and all the
2 paperwork that we've got, it was kind of pieced together. But listen,
3 listen --

4 CHARLOTTE HENDERSON: You're going to remain a Jane Doe.

5 JAMES ROBERT BUTLER: Very simply, they don't want your name to
6 come out at all. They're kind of okay with that, with you being a Jane
7 Doe. But obviously, now that everything's been dropped, they want to
8 clear everything and make sure that, you know--So basically, just I had
9 a few questions.

10 [REDACTED] [REDACTED]: Okay.

11 JAMES ROBERT BUTLER: Hoping that, you know--Again, if you
12 cooperate and kind of tell us what's going on, everything remains a
13 Jane Doe. We don't tell anybody who you are or what's going on,
14 nothing.

15 [REDACTED] [REDACTED]: Okay.

16 JAMES ROBERT BUTLER: So a couple of, quick questions was, how did
17 you end up approaching the attorney? Or did the attorney approach you,
18 or how did that work?

19 [REDACTED] [REDACTED] Something I saw on Facebook.

20 JAMES ROBERT BUTLER: You saw what on Facebook?

21 [REDACTED] [REDACTED]: An, an ad.

22 JAMES ROBERT BUTLER: Do you mind if we--just so that--the
23 barking? Alright, I'm sorry.

24 CHARLOTTE HENDERSON: It's okay.

25

1 ██████████ ██████████: I'm just curious as to how y'all found out, or
2 figured out who I am and where I am, because they said they wouldn't
3 release it even.

4 JAMES ROBERT BUTLER: So they kind of didn't, but just in the
5 interview and some of the things, like, when you take four little
6 pieces of things and add them together, we narrowed it down to maybe
7 20, 30 people. And then eventually, just doing background checks, and
8 Facebook, everything kind of matches.

9 CHARLOTTE HENDERSON: And like I said, we still want you to be
10 anonymous.

11 ██████████ ██████████: Okay.

12 CHARLOTTE HENDERSON: Everything was Jane Doe, and that's exactly
13 the way it's going to remain. But we just have a few questions.

14 ██████████ ██████████: Okay.

15 JAMES ROBERT BUTLER: So you found, you found what, you found a
16 lawyer, or you found something on Facebook, like--?

17 ██████████ ██████████: I found something on Facebook for the AVA, and
18 they put me in touch with Tony, and then, that's how it went.

19 JAMES ROBERT BUTLER: Tony?

20 ██████████ ██████████: Buzbee.

21 JAMES ROBERT BUTLER: Okay, so that's who you contacted first? Did
22 you ever meet him?

23 ██████████ ██████████: Yeah.

24 JAMES ROBERT BUTLER: Okay, we're just doublechecking, because I
25 know he has a lot of people who work in his office.

1 ██████████ ██████████: Yeah, no, I met him. He flew me out to --

2 JAMES ROBERT BUTLER: Houston.

3 ██████████ ██████████: Houston.

4 JAMES ROBERT BUTLER: Okay, so you went, you went and saw him
5 there.

6 CHARLOTTE HENDERSON: Did you go by yourself?

7 ██████████ ██████████: Yeah.

8 CHARLOTTE HENDERSON: Okay.

9 [00:05:00]

10 JAMES ROBERT BUTLER: Did he give you money to pay for the trip,
11 or did you, did he just reimburse you?

12 ██████████ ██████████: No, he paid for it.

13 CHARLOTTE HENDERSON: He flew her out there.

14 JAMES ROBERT BUTLER: Right, so he did pay, okay. Since the
15 situation, have you, have you been paid at all for what's going on?
16 Now, when you first talked to him, was he promising you anything? Or
17 did he help you with your story, or you got your story on your own?
18 Like what, what was the initial meeting with him like?

19 ██████████ ██████████: The first time I met him was in a coffee shop.

20 CHARLOTTE HENDERSON: Out here or in Texas?

21 ██████████ ██████████: In Houston.

22 JAMES ROBERT BUTLER: Okay, so you met him, and did you go through
23 each steps, or he just sat down and you just talked?

24 ██████████ ██████████: We talked about what all was going to go through
25 and what all had happened.

1 JAMES ROBERT BUTLER: Okay.

2 CHARLOTTE HENDERSON: So something happened? Or did he tell you
3 what happened?

4 ██████████ ██████████: No, he didn't tell me what happened, something
5 actually happened when I was 13. I ran away and I ended up, up there.

6 CHARLOTTE HENDERSON: But did it involve anybody that you named?

7 ██████████ ██████████: It involved Jay-Z and Diddy, but not the other
8 two.

9 JAMES ROBERT BUTLER: Okay, why did it now get dropped?

10 ██████████ ██████████: 'Cause I was too scared to go forward with it.
11 They told me he was threatening to kill me, Jay-Z was threatening.

12 CHARLOTTE HENDERSON: Who told you that?

13 ██████████ ██████████: They told me Jay-Z was threatening to kill me.

14 JAMES ROBERT BUTLER: Who?

15 CHARLOTTE HENDERSON: Who told you that?

16 ██████████ ██████████: The lawyers.

17 JAMES ROBERT BUTLER: The lawyers did?

18 CHARLOTTE HENDERSON: Buzbee?

19 ██████████ ██████████: Yeah, he said that there were threats against my
20 life, and that saying anything else could get me in a lot of trouble,
21 that he could come after me.

22 JAMES ROBERT BUTLER: Well, I can almost promise you that that's
23 not accurate, that's probably what-- So the problem is, is them going
24 forward, I think they were facing a lot of repercussions from it. And I

25

1 think they might have tried to talk you out of just getting rid of the
2 case.

3 [REDACTED] [REDACTED]: Okay.

4 JAMES ROBERT BUTLER: So now, I know you had the military service.
5 How come--what happened to the military service that you kinda left
6 early?

7 [REDACTED] [REDACTED]: I just got injured.

8 JAMES ROBERT BUTLER: You got injured? We saw some of your
9 Facebook stuff that said some of the issues you have now is from the
10 military? Alright. So as far as you're concerned, the whole story you
11 gave is accurate.

12 [REDACTED] [REDACTED]: Yes.

13 JAMES ROBERT BUTLER: They just talked you into drop the case,
14 'cause now, well, I'm not going to say they talked you into it, but
15 they kind of told you that --

16 [REDACTED] [REDACTED]: No, they talked me into dropping the case.

17 JAMES ROBERT BUTLER: Okay, and you were not planning on dropping
18 the case. Did they ever promise you money, or they just said, we'll see
19 what happens, or?

20 [REDACTED] [REDACTED]: Well, they said that I would get a payout, but I
21 already knew that that was not 100% accurate.

22 CHARLOTTE HENDERSON: Did you sign an agreement or anything? Any
23 kind of retainer, like when you retained them to handle the case, that
24 they would get 50%, or you would get 50%?

25 [REDACTED] [REDACTED]: Yes, it was, I did sign something like that.

1 CHARLOTTE HENDERSON: Okay, that they would get it, okay. And then
2 when they dropped it, or when you dropped it, did you have to pay them
3 expenses or anything? Okay.

4 JAMES ROBERT BUTLER: No. Okay.

5 CHARLOTTE HENDERSON: So you haven't paid them anything, and they
6 haven't paid you anything. Okay, so you honestly believe, and I don't
7 know the entire story of what happened when you were 13, why you ran
8 away and yada, yada, but Jay--D, I mean Jay-Z, they, honestly, you feel
9 like they raped you?

10 JAMES ROBERT BUTLER: We don't know --

11 [REDACTED] [REDACTED]: It was more Diddy, but Buzbee brought Jay-Z,
12 into it.

13 JAMES ROBERT BUTLER: See, now, if you don't mind, can you explain
14 that? 'Cause that's kind of the --

15 [REDACTED] [REDACTED]: He asked if Jay-Z was there, I said, yes.

16 JAMES ROBERT BUTLER: So when you originally sat down at the
17 coffee shop, you told him that Diddy did something to you?

18 [REDACTED] [REDACTED]: Yes, 'cause it started out, it was just Diddy
19 and [REDACTED], and then Jay-Z came in.

20 JAMES ROBERT BUTLER: But not from your mouth?

21 [REDACTED] [REDACTED]: Yeah.

22 JAMES ROBERT BUTLER: He asked you about Jay-Z?

23 [REDACTED] [REDACTED]: Yeah.

24 JAMES ROBERT BUTLER: But Jay-Z, was you're saying he was
25 definitely there? But he had no part in it, or he was just --

1 ██████████ ██████████: He was there.

2 CHARLOTTE HENDERSON: He was just there, but he didn't have
3 anything to do with any sexual acts towards you, it was strictly--

4 ██████████ ██████████: Yeah.

5 CHARLOTTE HENDERSON: Okay.

6 JAMES ROBERT BUTLER: Okay, and now, we're talking about it was at
7 a party or something like that, right, an after party. So he was just
8 present at the party? Okay. So you only got into Jay-Z's name because
9 he was asking you and--did he suggest that Jay-Z might have had some
10 part in it?

11 ██████████ ██████████: He was the one that kind of pushed me towards
12 going forward with him, with Jay-Z.

13 CHARLOTTE HENDERSON: With Jay-Z? Buzbee did?

14 ██████████ ██████████: Yeah.

15 JAMES ROBERT BUTLER: Do you know why?

16 ██████████ ██████████: No.

17 JAMES ROBERT BUTLER: He never mentioned it? Did you ask, like,
18 you know, why do you keep harping on--?

19 ██████████ ██████████: No.

20 [00:10:04]

21 JAMES ROBERT BUTLER: Okay.

22 CHARLOTTE HENDERSON: Why did you do the interview with NBC? Who
23 set that up?

24 ██████████ ██████████: Tony did.

25 CHARLOTTE HENDERSON: Tony?

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JAMES ROBERT BUTLER: Buzbee.

██████████ ██████████: Buzbee

CHARLOTTE HENDERSON: Buzbee? Okay. So did, where, where did you do the interview?

██████████ ██████████: In Tony Buzbee's office in Houston.

CHARLOTTE HENDERSON: Okay, and he flew you out there again for that, or was it the same time?

██████████ ██████████: No, it was the same time, he flew me out. He --

CHARLOTTE HENDERSON: He called NBC, and he got 'em there and --

██████████ ██████████: Yeah.

CHARLOTTE HENDERSON: Okay.

JAMES ROBERT BUTLER: Okay, that's all right. Listen, we definitely appreciate that you're being honest, because like you said, again, when, when it comes to like Jay-Z, we're kind of here on kind of his behalf-ish, because we believe that he said "I don't even know what--you know I had no part of that." And if you were pushed into saying that, that's something that's kind of worthwhile to us.

CHARLOTTE HENDERSON: Yeah.

██████████ ██████████: You're here on Jay-Z's behalf?

JAMES ROBERT BUTLER: Not on his behalf--

CHARLOTTE HENDERSON: Indirectly. But Jay-Z had nothing to do with this, correct?

██████████ ██████████: Right.

CHARLOTTE HENDERSON: Other than he was at the party that you were at. So I mean, he did not assault you?

1 [REDACTED] [REDACTED]: No.

2 CHARLOTTE HENDERSON: Would you be willing to give us an affidavit
3 to that effect?

4 JAMES ROBERT BUTLER: And from what we were told, if you do an
5 affidavit saying that that is true, they pretty much have said that
6 they will remain keeping your name as Jane Doe all the way through.

7 CHARLOTTE HENDERSON: You will be a Jane Doe.

8 JAMES ROBERT BUTLER: They're a little more upset with--they think
9 you're more of a victim. On that end of the case, that they took
10 advantage of you and kind of made you say things that maybe were not
11 accurate, to make the case better.

12 CHARLOTTE HENDERSON: Right, to get them more money.

13 [REDACTED] [REDACTED]: Yeah.

14 JAMES ROBERT BUTLER: So if that's true, that's something we kind
15 of --

16 CHARLOTTE HENDERSON: That we need to know.

17 JAMES ROBERT BUTLER: Because again, I hate to say it, you have
18 children, he, you know, they have children also. If one was
19 responsible, that's one thing, one was not responsible. You know, his
20 kids, his wife, his family, you know now they're hearing that he might
21 be responsible for something that nobody wants to be accused of if they
22 didn't do it. Do you understand that?

23 [REDACTED] [REDACTED]: Yeah.

24 JAMES ROBERT BUTLER: I'm sure you can understand that. I mean--

25 [REDACTED] [REDACTED]: Yeah.

1 JAMES ROBERT BUTLER: Nobody wants their kids thinking bad of
2 them.

3 CHARLOTTE HENDERSON: Right. So would you be willing to help us as
4 far as the fact that the things that you said about Jay-Z were not
5 correct?

6 JAMES ROBERT BUTLER: We just want, we just want to set the record
7 straight, so that he's able, you know, so that --

8 CHARLOTTE HENDERSON: So that he can move on and this can get out
9 of his, you know, being accused of this, because you know it didn't
10 happen. Correct? Correct?

11 [REDACTED] [REDACTED]: You have a good day, guys.

12 JAMES ROBERT BUTLER: Are you sure?

13 CHARLOTTE HENDERSON: [REDACTED] come here it's okay.

14 JAMES ROBERT BUTLER: I promise, we're not here to hurt you, we're
15 not --

16 CHARLOTTE HENDERSON: We're going to try to help you. We're not
17 doing this to hurt you, this is all to help you, believe me. What's
18 wrong, tell me, tell me, talk to me.

19 JAMES ROBERT BUTLER: Yeah, if you have any concerns, tell us what
20 they are and we'll see if we can--

21 CHARLOTTE HENDERSON: Just talk to me. If Jay-Z didn't have
22 anything to do with it, it's okay. But if he did, we need to know. I
23 mean I promise you, we're not here to hurt you. And like I said, we're
24 going to keep you out of it. You're going to be Jane Doe.

25

1 JAMES ROBERT BUTLER: We're just going to set the record straight,
2 that's really the only thing we're here for.

3 CHARLOTTE HENDERSON: I promise.

4 [REDACTED] [REDACTED]: I don't want him getting mad at me.

5 CHARLOTTE HENDERSON: He's not. And I don't know where these
6 threats--he's, that never--that came from Buzbee. And that never
7 happened, Jay-Z never said anything like that.

8 [REDACTED] [REDACTED]: But you're saying he found me and you guys are
9 here because he found me.

10 CHARLOTTE HENDERSON: I don't know that he found you.

11 JAMES ROBERT BUTLER: I don't know if he found you. Like I said,
12 we're going to keep your name as Jane Doe. We're just independent
13 hires. Like we just come talk to you and try to set the record
14 straight. That's all we're told to come here for. And as long as you
15 were honest and kept with it, they kind of said we're going to get a
16 lawyer to come. And a lawyer has nothing to do with anything. Have you
17 sign an affidavit, set the record straight, and keep you as a Jane Doe,
18 just to kind of clear out, you know, just clear the truth.

19 CHARLOTTE HENDERSON: Right. We just want to know that Jay-Z was
20 not--he was there, but he had nothing to do with your sexual assault.

21 JAMES ROBERT BUTLER: And that's all. Like we're not asking you to
22 say nothing bad happened to you, we're not here to say that you're, you
23 know, just that--

24 CHARLOTTE HENDERSON: Yeah, and we're not dismissing the fact that
25 something happened to you. That has nothing to do with, but we just

1 want to clarify that Jay-Z did not have anything to do with it. And
2 that he didn't sexually assault you.

3 JAMES ROBERT BUTLER: Is that, is that a fair assessment?

4 [00:15:00]

5 [REDACTED] [REDACTED]: Yeah.

6 JAMES ROBERT BUTLER: Okay. That's all.

7 CHARLOTTE HENDERSON: That's all we need, that's all we want. And
8 that's all we want to do is just ask you about that. And if you're
9 willing to sign an affidavit to the fact that Jay-Z had nothing to do
10 with it.

11 JAMES ROBERT BUTLER: And that's all it would say. It's not going
12 to say anything else about anything else that happened to you that
13 night. Just that he was not a participant. Then, when they go forward--
14 it's because they have a problem with other folks now. Because they
15 basically, they're trying to make up things against their client. So
16 they're going to look to go after them. And they can leave your name
17 out of it as a Jane Doe with cooperation. Because then there's no
18 reason to include you. Because we do think you're kind of a victim. We
19 think they kinda took advantage of you.

20 [REDACTED] [REDACTED]: But how does this help me?

21 JAMES ROBERT BUTLER: It keeps you anonymous. And to be honest, it
22 sets the record straight. Like I said, I don't think it's necessarily
23 fair that some of his kids think that they did something that they
24 didn't do. And I'd say, you know obviously, he's very popular. You
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know, a lot of people think that he maybe did something really
horrible. And if he didn't, we want to straighten it out.

████████ ██████████: Y'all a nice afternoon.

CHARLOTTE HENDERSON: ██████████ can we call you?