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 David W. Slayton,
 Executive Officer/Clerk of Court,
 By W. Lee, Deputy Clerk

9 Attorneys for Defendants, THE BUZBEE LAW
 FIRM and ANTHONY G. BUZBEE

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
 12 COUNTY OF LOS ANGELES, SANTA MONICA COURTHOUSE

14 SHAWN CARTER,

15 Plaintiff,

16 v.

17 THE BUZBEE LAW FIRM, ANTHONY G.
 BUZBEE,

18 Defendants.

Case No. 24SMCV05637

Assigned for All Purposes to:
 Hon. Mark H. Epstein, Department I

**DECLARATION OF JANE DOE IN
 RESPONSE TO SHAWN CARTER'S
 PROFFER OF NEW EVIDENCE AT
 HEARING ON DEFENDANTS' SPECIAL
 MOTION TO STRIKE PORTIONS OF
 PLAINTIFF'S FIRST AMENDED
 COMPLAINT**

DECLARATION OF JANE DOE

I, Jane Doe, declare as follows:

1. I am over the age of eighteen and I am the individual referred to as “Jane Doe” in the action *Jane Doe v. Sean Combs, et al.*, Case No. 1:24-cv-07975-AT (S.D.N.Y.) (the “New York Action”). I am also the individual identified as “Jane Doe” in a letter (“Demand Letter”) sent by Defendant The Buzbee Law Firm to Shawn Carter (“Carter” or “Jay-Z”) in or about November of 2024. I was granted permission to proceed under a pseudonym in the New York Action, and make this Declaration under a pseudonym for the same reasons as in the New York Action.

2. I have personal knowledge of the facts set forth herein, which are known by me to be true and correct, and if called as a witness, I could and would competently testify thereto.

3. This declaration is submitted in support of the Defendants The Buzbee Law Firm and Anthony G. Buzbee’s (“Mr. Buzbee”) Motion To Strike Under Code of Civil Procedure Section 425.16 (“Motion”).

4. On Friday, February 21, 2025, I was approached at my home by two individuals, a woman and a large man. They cornered me on my front porch and told me that they are investigators working with an attorney on behalf of Jay-Z. They asked me if I would be willing to sign an affidavit stating that my claims in the New York Action were false. I refused. They also asked me if Mr. Buzbee sought me out as a client, and whether Mr. Buzbee offered to pay me to pursue a false claim against Jay-Z. I told them that neither of those things ever happened, and I asked them to leave me alone. I felt intimidated and terrified at being confronted by these two individuals on my doorstep, and that they knew my name and home address despite me being anonymous in the New York Action.

5. I also understand that investigators approached my father and my mother multiple times. Two investigators approached my father and mother as my father was picking my mother up from a medical appointment, asking them similar questions about whether Mr. Buzbee had paid me, and requesting that they sign affidavits stating that my claims were false. My father was separately approached later at a gas station, and my mother was separately approached at a store.

1 In all instances my parents refused to sign any affidavits, denied the investigators' claims about
2 my case and Mr. Buzbee's conduct, and asked to be left alone.

3 6. It is very alarming to me that Jay-Z's agents are looking for me and now know my
4 whereabouts. Fear of intimidation and retaliation from Jay-Z and/or his associates or fans is one
5 of the reasons that I chose not to pursue the New York Action and instructed my attorneys to
6 dismiss it.

7 7. Although I ultimately chose not to pursue them, I stand by my claims in the New
8 York Action and believe that I had a meritorious claim against Jay-Z. In September of 2000,
9 when I was approximately thirteen years old, I attended a party at a house in New York where
10 both Sean Combs ("Diddy") and Jay-Z were present. I saw and recognized both men at the party.
11 At the party, I accepted a drink and began to feel lightheaded. I went into an empty bedroom to lie
12 down by myself. Soon after that, Diddy, Jay-Z, and another individual entered the bedroom. Jay-
13 Z removed my clothes, and both Jay-Z and Diddy engaged in sexual intercourse with me. I did
14 not consent to this, and, given that I was only thirteen at the time, I could not have given valid
15 consent.

16 8. In 2024, I signed up as a client with AVA Law Group. AVA Law Group partnered
17 with The Buzbee Law Firm to pursue claims against Diddy and others, and my case was referred
18 to The Buzbee Law Firm as a result. Several attorneys from the Buzbee Law Firm interviewed me
19 extensively, including Anthony Buzbee ("Mr. Buzbee"). I authorized Mr. Buzbee and The
20 Buzbee Law Firm to send a demand letter to Jay-Z, and to initiate legal proceedings against him in
21 the New York Action.

22 9. I ultimately decided to dismiss the New York Action, because I was frightened by
23 the reaction of Jay-Z and his supporters, and the likelihood that I would have to be publicly named
24 and subjected to public attacks. Jay-Z and his attorneys made numerous public statements
25 attacking the veracity of my claims, and I am informed and believe that he sent investigators
26 looking for me. I understand that even my attorneys have been sued by Jay-Z. I was not prepared
27 to undergo years of attacks, intimidation, and harassment, and ultimately chose to dismiss my
28 claims after certain negotiations among the attorneys involved in the New York Action.

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

Executed on this 27th day of February, 2025.

Signed by:
Jane Doe
1883D9E4ACB848F...

JANE DOE

