

1 Arbella Azizian # 294696
2 BAKER, OLSON, LeCROY & DANIELIAN
3 100 W. BROADWAY # 990
4 GLENDALE, CA 91210
5 T: 818 502 5600
6 F. 818 241 2653
7 azizian@boldlaw.com

8 Attorneys for Plaintiff Gregg "Rocky" Brooks

9 SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

10 CENTRAL DISTRICT

11 GREGG "ROCKY" BROOKS

12 Plaintiff,

13 v.

14 JOHN C. DEPP, an individual; BRAD
15 FURMAN, an individual; INFINITUM NIHIL,
16 A Californian Corporation; And DOES 1-50

17 Defendants.

18 Case No.: BC713123

19 **PLAINTIFF'S MOTION IN LIMINE**
20 **NO. 2 TO EXCLUDE EVIDENCE AND**
21 **ARGUMENT REGARDING ALLEGED**
22 **DRUG AND ALCOHOL USE BY JOHN**
23 **C. DEPP, II**

24 Date: October 7, 2019
25 Time: 8:30 a.m.
26 Location: Dept. 56

27 TO THE HONORABLE COURT, ALL PARTIES AND THEIR ATTORNEYS OF
28 RECORD:

Plaintiff, Gregg "Rocky" Brooks ("Plaintiff") hereby submits his opposition to Defendants' MOTION IN LIMINE No. 2 TO EXCLUDE EVIDENCE AND ARGUMENT REGARDING ALLEGED DRUG AND ALCOHOL USE BY JOHN C. DEPP, II follows:

A. Defendant Depp's Drug And Alcohol Use Is Relevant and Material To This Case.

Plaintiff and his witnesses paint a specific picture of what transpired on the set during the filing of City of Lies. Defendant John C. Depp, II ("Defendant Depp") was question and blamed other for the delays in the production, however, testimony will reveal, the stress and delay caused during the filing of City of Lies which culminated in his conduct of April 12, 2017, were