

## **DOKOZA TIMELINE**

For posterity's sake, here's some undeniable facts memorializing Dokoza's rise and fall timeline in bullets:

- September 28, 2010 – Dokoza enters agency agreement with Lenhoff
- 2010–2014 – Lenhoff on a tear triples Dokoza's income and books on A to Z, Baskets, Da Ali G Show, The Reporters, Girlfriend in a Coma, Up All Night
- February 8, 2014 – Lenhoff books Dokoza on "A to Z" pilot episode with a series option
- March 8, 2011 – Lenhoff introduces Dokoza to FX's Nick Lombardo & Matt Miegolecki
- January 15, 2014 – Baskets pilot picked up
- March 7, 2014 – Lenhoff pitches Dokoza to Blair Breard for Baskets
- 3/24/14 – Dokoza contracts with "Baskets" pilot ONLY so as not to conflict with "A to Z"
- 3/24/14 – Dokoza discuss doing Baskets series in May 2015 – Gotcha e-mail
- 4/30/14 to 12/15/14 – Lenhoff send UTA monthly notices of client list **including Dokoza and terms.**
- April - May 23, 2014 – Dokoza produces the Baskets pilot episode
- April 30, 2014 – Lenhoff sends 1<sup>st</sup> dispute notice to UTA noticing exclusive client list and terms
- O/a May 15, 2014 – Dokoza's "A to Z" series option is picked up and she commences exclusive services

- June 9, 2014 – Lenhoff sends 2<sup>nd</sup> dispute notice to UTA noticing exclusive client list and terms
- July 14, 2014 – Lenhoff sends 3<sup>rd</sup> dispute notice to UTA noticing exclusive client list and terms
- July 24, 2014 – Dokoza delivers a Baskets series budget to Blair Breard, Nick Lombardo and Matt Magielnicki @ FX (while working on A to Z)
- July 25, 2014 – Magielnicki sends Scott Frimmer @ FX Business Affairs the Dokoza 7/25/14 budget (he starts working off that budget and making deals)
- 7/29/14 & 7/30/14 – Lenhoff receives offer for Dokoza to produce “Baskets” series from Blair Breard – offer is contingent on Dokoza’s availability – Lenhoff discusses offer with Dokoza and scheduling issue
- August 15, 2014 – Lenhoff sends 3<sup>rd</sup> dispute notice to UTA noticing exclusive client list and terms
- August 27, 2014 - Baskets series is picked up
- September 2014 – Lenhoff successfully gets Dokoza into the DGA union.
- September 16, 2014 – Lenhoff sends 4<sup>th</sup> dispute notice to UTA noticing exclusive client list and terms
- October 13, 2014 – Andrew Singer emails Lenhoff that he wants to hire Dokoza for the HBO pilot reshoot
- October 14, 2014 – Blair Breard tells Lenhoff she is waiting for a locked series budget before closing Dokoza’s series deal.
- October 16, 2014 – Lenhoff sends 5<sup>th</sup> dispute notice to UTA noticing exclusive client list and terms

- October 22, 2014 – Dokoza discuss doing “A To Z” back 9, “Brothers In Atlanta” pilot reshoot and “Baskets series in May 2015 – Gotcha e-mail
- October 29, 2014 - Lenhoff starts negotiating Brother’s In Atlanta pilot reshoot with Susan Goldberg @ HBO. Goldberg @ HBO makes offer for Dokoza to produce “Brothers In Atlanta” pilot reshoot with series option behind the “Baskets” series
- October 29, 2014 – Frimmer sends the Dokoza 7/25/14 Baskets series budget to Suresh Seeram in FX accounting (presumable to start the series cash flow)
- October 21, 2014 – “Brothers In Atlanta” pilot reshoot casting breakdown goes out
- October 31, 2014 – A to Z cancelled
- November 4, 2014 – 11/4/14 – Dokoza dismisses L&L while working on “A To Z” and negotiating 2 other deals for “Brothers In Atlanta” and “Baskets”
- November 5, 2014 Lenhoff sends the “72 Hours” letter to Dokoza as required under Title 8 California Code Of Regulation 12002 claiming commissions to 3 shows: “A to Z,” “Brothers In Atlanta” and “Baskets
- o/a November 12, 2014 – Dokoza retains UTA
- November 18, 2014 – Lenhoff sends 5<sup>th</sup> dispute notice to UTA noticing exclusive client list and terms
- January 7, 2015 – Dokoza’s receives final payment for work performed on “A To Z”
- January 22, 2015 - Dokoza starts work on Brothers In Atlanta pilot reshoot – Lisa Lenhoff e-mails her a check authorization

- January 30, 2015 – UTA sends Lenhoff a fuck you and piss off letter. In discovery, UTA curiously labels it as “Anna Dokoza – Protection Letter”.
- February 4, 2015 – Lenhoff assigns Dokoza debt to Silverman
- February 13, 2015 – Lenhoff vs. UTA & ICM federal complaint filed
- June 4, 2015 – Silverman files suit against Dokoza and spends over 5 months trying to get Dokoza to settle the matter
- July 7, 2015 – Dokoza asks Baskets to issue 1<sup>st</sup> check for \$7500 but is delayed because of insurance issues at FX
- July 31, 2015 – Dokoza issued the 1<sup>st</sup> Baskets series payroll check
- August 11, 2015 – Lenhoff receives Dokoza’s 1<sup>st</sup> Baskets check for \$6975 for w/e 7/31 and deposits it into Dokoza’s agency trust account
- o/a August 14, 2015 – “Baskets” accountant Emily Rice calls Lisa Lenhoff “It’s my fault and I hate when this happens because I’m going to have to reissue Dokoza a replacement check”. We refer her to Arden Silverman
- August 14, 2015 – Dokoza is reissued 3 Baskets checks for \$2325 for w/e 7/17, 7/24 and 7/31
- October 24, 2015 – Dokoza served Silverman’s LASC complaint
- November 24, 2015 – UTA hires lawyers @ Freedman & Taitelman to represent Dokoza requests a week extension from Silverman
- December 1, 2015 – Dokoza files cross complaint against L&L (**box #13 of related cases is checked “no” which is a flat out lie to the LA Superior court)**)

- December 3, 2015 – Lenhoff deposits \$6975 of Baskets money into Dokoza’s account
- o/a December 4<sup>th</sup>, 2015 – Lenhoff is served the Dokoza LASC complaint
- December 4, 2015 - Silverman attempts to propound discovery on Dokoza:
  - Request For Document Production
  - Special Interrogatories
  - Form Interrogatories
  - Notice of Taking of Deposition of Dokoza
- December 7, 2015 – Dokoza files a LASC motion to stay proceedings, memorandum of points of authorities in support thereof, declaration of Marmorstein
- January 4, 2016 – Dokoza petitions the Labor Commissioner to determine the controversy (misrepresenting a theft, breach our fiduciary duty, violation of the TAA, etc.)
- January 4, 2016 – Dokoza files LASC motions to object all DISCO, FROGS, DEPO
- January 5, 2016 – John Kalajian retained
- January 8, 2016 – Kalajian files a general denial in LASC
- January 22, 2016 – Kalajian files an admission & denial response with Labor Commissioner
- January 29, 2016 - Kalajian attempts to propound discovery on Dokoza and UTA with the following:
  - Demand For Production To Anna Dokoza

- Deposition Subpoena For Production Of Business Records and Notice To Consumer
  - Form Interrogatories to Anna Dokoza
  - Form Interrogatories to Luka's Girl
  - Notice Of Business Records Deposition of UTA and Notice To Consumer
  - Request For Admission: Truth In Facts - Dokoza
  - Request For Admission: Truth In Facts – Luka's Girl
  - Special Set Of Interrogatories - Dokoza
  - Special Set Of Interrogatories – Luka's Girl
- January 29, 2016 – Dokoza files a notice of continuance motion to stay in LASC
  - February 4, 2016 – Dokoza files motions in LASC to stay discovery until Labor Commissioner determines controversy
  - February 4, 2016 – Labor Commissioner assigns hearing office Michael Jackman
  - February 21, 2016 – Kalajian files LASC motion in opposition to stay entire action
  - March 1, 2016 – UTA files LASC motion objecting to deposition and production of business records
  - March 28, 2016 – Kalajian files response with Labor Commissioner that Dokoza is not an “artist”
  - April 8, 2016 – Kalajian files motion with Labor Commissioner to dismiss or bifurcate affirmative defense of lack of jurisdiction
  - April 11, 2016 – Kalajian issues subpoena requests with Labor Commissioner for Blair Breard, Matt Magielnicki, Andrew Singer, Susan Goldberg

- May 1, 2016 – Dokoza files opposition motion to dismiss with Labor Commissioner
- May 4, 2016 – Kalajian files motion for judicial notice with Labor Commissioner
- May 5, 2016 – Jackman @ Labor Commission notices hearing continuance
- May 12, 2016 – Marmorstein sends letter to Labor Commissioner objecting to subpoenas request and demands a briefing schedule
- May 17, 2016 – Jackman sends notice of telephonic hearing on motion to quash issuance of subpoenas
- May 25, 2016 – Dokoza files motion to quash subpoenas with Labor Commission
- June 3, 2016 – Kalajian files opposition to motion to quash subpoenas with Labor Commissioner
- June 8, 2016 – Dokoza files reply brief in support of motion to quash subpoenas with Labor Commissioner
- June 10, 2016 – Silverman reassigns the Dokoza debt back to Lenhoff
- August 22, 2016 – Kalajian emails Marmorstein a request to stipulate a stay in a cross compliant filed by November 2016 (Marmorstein never replies)
- September 1, 2016 – Kalajian files motion for judicial notice with Labor Commissioner on 3 prior cases with that line producers / upms are not artists
- September 1, 2016 – Kalajian files LASC motion for leave to file cross-complaint, points and authorities and supporting declaration, proposed cross complaint
- September 2, 2016 – Kalajian files motion in limine with Labor Commissioner to preclude any witness testimony inconsistent with integrated written agreement on Baskets

- September 20, 2016 – Dokoza files opposition motion in limine with Labor Commissioner
- September 20, 2016 – Dokoza files opposition motion for leave to file cross complaint with LASC
- September 21, 2016 – Kalajian files reply to opposition to motion in limine with Labor commissioner
- September 21, 2016 – Kalajian files reply to opposition to motion for leave to files cross complaint with LASC
- September 26, 2016 – Kalajian files Lenhoff declaration in support for motion to dismiss with Labor Commissioner
- October 1, 2016 – Kalajian sends letter to Labor Commissioner demanding action from Jackman
- October 17, 2016 – Kalajian files a notice to be relieved as counsel with LASC – a hearing is set for 1/4/17
- October 31, 2016 – Charnley Ryan files suit against Dokoza
- December 6, 2016 – Dokoza is bounced from the Labor Commissioner and denied safe harbor. Yeah for our team!!!
- December 7, 2016 – Kalajian files notice with Labor Commissioner to be relieved as counsel. This is done without my consent and PRIOR to receiving notice of Dokoza be denied safe harbor by the Labor Commissioner
- December 7, 2016 – Bryan Freedman sniffs out Kalajian's notice to be relieved as counsel and sends that information to the Labor Commissioner (reminding them a corporate party needs a licensed attorney



- December 10, 2016 – Bryan Freedman sniffs out the related case
- December 19, 2016 – Kalajian sends LASC a response and corrections notice of related case
- January 4, 2017 – Kalajian is granted motion to be relieved by LASC
- January 5, 2017 – Dokoza send notice to LASCL of the Labor Commissioner's decision
- January 5, 2017 – Dokoza sends notice of court's ruling and status conference to LASC
- January 27, 2017 – Charnley sends notice of attorney substitution to LASC
- February 1, 2017 - Dokoza propounds discovery on Lenhoff
- February 21, 2017 – Dokoza sends LASC notice of defendant's answer to complaint
- March 13, 2017 – Lenhoff responds to Dokoza's discovery requests with Form interrogatories, special interrogatories and production of documents
- July 20, 2017 – Dokoza sends notice of Lenhoff videotaped deposition for 8/3/17
- July 20, 2017 – Dokoza sends notice of Frimmer videotaped deposition for 8/7/17
  - Deposition Subpoena For Production Of Business Records and Notice To Consumer
  - Form Interrogatories to Anna Dokoza
  - Form Interrogatories to Luka's Girl
  - Notice Of Business Records Deposition
  - Request For Admission: Truth In Facts - Dokoza
  - Request For Admission: Truth In Facts – Luka's Girl

- Special Set Of Interrogatories - Dokoza
  - Special Set Of Interrogatories – Luka’s Girl
- July 28, 2017 – Dokoza sends notice of Blair Breard depo on 9/14/17 to LASC
- August 3, 2017 – Dokoza subpoenas FX for records in LASC
- August 9, 2017 – Dokoza sends LASC notice of Lenhoff deposition continuance to 9/6/17
- August 11, 2017 – Charnley subpoenas FX for records in LASC
- August 14, 2017 – Charnley subpoenas UTA for records in LASC
- August 14, 2017 – Charnley subpoenas Louie Zach for records in LASC
- August 16, 2017 – Dokoza sends LASC notice of Nick Lombardo deposition
- August 25, 2017 – Dokoza sends LASC notice of Lenhoff deposition continuance to 9/19/17
- September 1, 2017 – Dokoza sends LASC notice of non-party UTA objections and responses to depositions and production of business records
- September 6, 2017 – Charnley sends LASC notice of confidentiality order
- September 6, 2017 – Charnley sends LASC notice of Michael Sinclair @ UTA depo on 10/25/17
- September 6, 2017 – Charnley sends LASC notice of Matt Rice @ UTA depo on 10/25/17
- September 6, 2017 – Charnley sends LASC notice of Peter Benedict @ UTA depo on 10/24/17
- September 6, 2017 – Charnley sends LASC notice of Andrew Tsau @ UTA depo on 10/25/17

- September 6, 2017 – Charnley sends LASC notice of Ryan Tracey @ UTA depo on 10/26/17
- September 11, 2017 – Charnley sends LASC notice of Dokoza deposition on 10/31/17
- September 14, 2017 – Dokoza sends LASC notice of Breard deposition continuance to 9/28/17
- September 18, 2017 – Charnley sends LASC notice of stipulation and order of confidentiality
- September 25, 2017 – Dokoza sends LASC notice of Lenhoff deposition continuance to 11/2/17
- September 14, 2017 – Dokoza sends LASC notice of Breard deposition continuance to 9/28/17
- October 24, 2017 – Dokoza sends LASC notice of Breard “second” deposition continuance to 12/6/17 (when it was the 3<sup>rd</sup> continuance)
- October 26, 2017 – Charnley sends notice of Dokoza production documents, special interrogatories and admissions.
- October 27, 2017 – Charnley sends LASC notice of Objection of further continuance of deposition of Lenhoff
- October 31, 2017 – Dokoza deposition (postponed)
- November 2, 2017 – Marmorstein threatens Charnley with sanctions and Charnley pushes back
- November 15, 2017 – Marmorstein sends another harsh email to Charnley

- November 15, 2017 – Dokoza sends LASC notice of Dokoza’s responses and objections to admissions,
- November 15, 2017 – Dokoza sends LASC notice of Dokoza’s responses and objections to supplemental responses to form interrogatories
- November 15, 2017 – Dokoza sends LASC notice of Dokoza’s responses and objections to request for production of documents
- November 28, 2017 – Dokoza sends LASC notice seeking motion to compel Lenhoff deposition and \$3600 sanctions
- December 6, 2017 – Dokoza deposes Blair Breard
- December 12, 2017 – Charnley sends Lenhoff notice requesting to be removed
- December 13, 2017 – Neville Johnson replaces Charnley
- January 24, 2018 – Dokoza deposes Lenhoff
- February 20, 2018 – Dokoza files complaint against Lenhoff with the DGA and sees Arbitration.
- February 22, 2018 – Lenhoff deposes Emily Rice
- February 26, 2018 – Lenhoff deposes Dokoza
- March 22, 2018 – Dokoza agrees to drop all DGA claims against Lenhoff, and expunge all former claims on the record against Lenhoff with the California Labor Commissioner.
- April 19, 2018 – Lenhoff files ethics complaint with Tom Lills @ California State Bar against Dokoza’s lawyers BRYAN FREEDMAN & DAVID MARMORSTEIN

- May 2018 – Dokoza’s lawyer offers Lenhoff \$10,000 to settle dispute – Lenhoff politely but firmly declines believing someday in the future, Dokoza will fess up and pay the \$200,000 in commissions owed plus 10% simple annual interest.
- May 18, 2018 – Lenhoff and Dokoza file Requests For Dismissal with the LA Superior Court