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                      SUPERIOR COURT OF THE STATE OF CALIFORNIA
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                              FOR THE COUNTY OF LOS ANGELES
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                                                        Case No. BC316318 [lead case]
     IN RE: PELLICANO CASES:
                                                        BC316459; BC349590;
                                                                                  BC350832;
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                                                                                  BC356722;
                                                        BC354840;
                                                                     BC356529;
     Anita Busch vs. Anthony Pellicano, et al.,
                                                        BC358270; BC358271;
                                                                                  BC361319;
     Bo Zenga vs. City of Los Angeles, et al.;
19
     Keith Carradine, et al. v. Anthony Pellicano, et al.;)
                                                        BC361621
                                                        [Hon. Judge Peter Lichtman]
     Lisa Bonder Kerkorian v. AT&T Corp., et al.;
20
     Donna Dubrow v. Anthony Pellicano, et al.;
                                                        DECLARATION OF
                                                                                 CHERYL
     Monika Zsibrita, et al. v. City of Los Angeles, et al.;)
21
                                                        SHUMAN (FILED UNDER SEAL)
     Stephen Kolodny v. Terry N. Christensen, et al.;
     Alexander Kasper v. Pacific Bell Tel. Co., et al.;
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     Erin Finn v. Pacific Bell Tel. Co., et al.;
     Andrew Miller v. City of Los Angeles, et al.;
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     Ami Shafrir v. City of Beverly Hills, et al.,
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<u>DECLARATION OF CHERYL SHUMAN</u> (FILED UNDER SEAL)

I, Cheryl Shuman, hereby declare and state as follows:

- 1. I am a resident of California and over eighteen (18) years of age. I have personal knowledge of the facts stated herein and, if called, I could and would competently testify thereto.
 - 2. I have been working in the film industry since the 80's.
- 3. During the late 80's, in the course of my profession, I witnessed an incident that, if published, could have been very damaging to the reputation and image of a certain public figure. I was threatened by that public figure that if I ever disclosed this information to anyone, he would kill me.
- 4. This threat was followed by numerous and continuous subsequent death threats, to me and my children. To protect the health of myself and my family, I was advised to document the incident in case something ever happened to me or my family. Therefore, I gave an interview to the press regarding that public figure in late 1994 or early 1995.
- 5. On the same night of the interview, as I was returning home, I was brutally attacked and severely bruised and injured. I was told by my attacker to "keep your mouth shut. We know where you live. We can come and get you any time, any day we want."
- 6. I filed a report in the Beverly Hills Police Dept., and was contacted by Detective Craig Stevens ("Stevens") who personally called me and told me that he would be investigating my case and that if I had any problems, any issues, call him immediately. For several months thereafter, I spoke with Stevens on an almost daily basis.
- 7. Following my filing the report, I received death threats, was sent pictures of my children at the playground along with copies of their death certificates. This was all reported to Stevens, who told me he was still investigating it and documenting everything I reported to him.
- 8. Shortly thereafter, sometime in the Spring of 1995, after receiving a call from someone at the Beverly Hills Police Department, I was raped at my house by two individuals, who gained entry to my home by identifying themselves as police officers.

1	9. After discovering that Stevens pled guilty to criminal conduct involving his
2	association with Anthony Pellicano, I believe that he mishandled the investigation of my complaints,
3	either intentionally or negligently, in such a manner as to cover up the criminal conduct of the
4	perpetrators.
5	I am terminally ill and have been advised by my doctors that my days are numbered.
6	I do not want to spend my last days in fear of me or my family being harassed, threatened, terrorized,
7	attacked or even killed.
8	In light of the current stay of the proceedings, I might not live long enough to have
9	my deposition taken, testify in court or pursue my own legal action.
10	12. If the stay is lifted, I will be willing to go public and pursue all legal remedies
11	available to me. However, there is little purpose in making such a big sacrifice and risk my life if
12	I do not live long enough to participate in the legal process as a witness and/or a plaintiff.
13	13. A true and correct copy of a redacted verbatim transcript of a confidential interview
14	conducted with me on October 12, 2007 is attached hereto as Exhibit "A" (filed under seal.)
15	I declare under penalty of perjury under the laws of the State of California that the foregoing
16	is true and correct. Executed this day of October 2007, at,
17	California.
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19	CHERYL SHUMAN
20	CHERTE BITOWNIA
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After discovering that Stevens pled guilty to criminal conduct involving his