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11
12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 COUNTY OF LOS ANGELES

CONFIDENTIAL COPY
OF ORIGINAL FILED
Los Angeles Superior Court

JUL 12 2007

John A. Clarke, Executive Officer/Clerk

By _____, Deputy

15 SAMANTHA RONSON,
16 Plaintiff,
17 vs.
18 SUNSET PHOTO AND NEWS, LLC, JILL
19 ISHKANIAN, MARIO LAVANDEIRA
20 doing business as PEREZ HILTON,
21 and DOES 1-10, inclusive,
22 Defendants.

Case No.:
COMPLAINT FOR DAMAGES
(Libel)
JURY TRIAL DEMANDED

BC374174

22 Plaintiff SAMANTHA RONSON ("Ronson"), by her attorneys, Bingham McCutchen LLP
23 and Davis & Gilbert LLP, for her Complaint against Defendants SUNSET PHOTO AND NEWS,
24 LLC; JILL ISHKANIAN; MARIO LAVANDEIRA doing business as PEREZ HILTON; and
25 DOES 1 through 10, states as follows:
26

27 1. Plaintiff Ronson is an individual who resides and does business in Los Angeles
28 County, California.

7/12

1 2. Ronson is a professional disc jockey ("DJ") who is regularly hired to perform at
2 exclusive parties and events. Ronson has previously performed at events such as pop star Jessica
3 Simpson's birthday party; corporate events for Blender, Maxim, PlayStation at the Superbowl and
4 ElleGirl; and entertainment awards shows including the Video Music Awards in Miami,
5 Sundance, and the Independent Film Channel Awards.

6 3. Defendant Sunset Photo and News, LLC ("Sunset Photo") is, upon information and
7 belief, a limited liability company organized and existing under the laws of the State of California,
8 with its principal place of business located at 8491 Sunset Boulevard, Suite 117, West Hollywood,
9 in the County of Los Angeles, California. Upon information and belief, Sunset Photo is a
10 "paparazzi agency" that specializes in collecting and distributing photographs and gossip about
11 famous entertainers and other celebrities.

12 4. Upon information and belief, Sunset Photo owns and controls the online magazine,
13 CelebrityBabylon.com ("Celebrity Babylon"). Celebrity Babylon is an online magazine, publicly
14 available on the Internet, that publishes gossip about famous entertainers and other celebrities.

15 5. Defendant Jill Ishkanian ("Ishkanian") is an individual who, upon information and
16 belief, does business in the County of Los Angeles, California, at 8491 Sunset Boulevard, Suite
17 117, West Hollywood, California, as a principal of Sunset Photo and as Editor-in-Chief of
18 Celebrity Babylon.

19 6. Defendant Mario Lavandeira ("Lavandeira"), doing business as Perez Hilton, is an
20 individual who, upon information and belief, maintains a place of business at 11601 Wilshire
21 Boulevard, Suite 2040, in the County and City of Los Angeles, California, and resides in the
22 County of Los Angeles, California.

23 7. Upon information and belief, Defendant Lavandeira, doing business as Perez
24 Hilton, owns and controls "PerezHilton.com," a website that publishes gossip about famous
25 entertainers and other celebrities.

26 8. The true names of defendants DOES 1 through 10, inclusive, are unknown to
27 Plaintiff, who therefore sues such defendants by fictitious names. Plaintiff is informed and
28 believes, and based on that information and belief alleges, that each of the defendants designated

1 as a DOE is legally responsible for the events and happenings referred to in this complaint, and
2 unlawfully caused the injuries and damages to Plaintiff alleged in this complaint.

3 9. Jurisdiction and venue are proper in this Court in that Plaintiff resides in and has
4 suffered injury in California as a result of Defendants' tortious act of publishing defamatory
5 statements about Plaintiff on the Internet, which was published to millions of people in the United
6 States including persons in the State of California, and because Defendants are headquartered
7 and/or reside in the County of Los Angeles, California.

8 10. On or about May 26, 2007, news outlets and websites began reporting that, early in
9 the morning on May 26, 2007, celebrity actress Lindsay Lohan ("Lohan") was involved in a car
10 accident on Sunset Boulevard in Beverly Hills, California; that Lohan was under suspicion for
11 driving under the influence of alcohol; and that the police who were called to the scene found
12 cocaine in Lohan's car. Ronson was in the car with Lohan at the time of the incident.

13 11. The incident involving Lohan's car accident received widespread media attention.

14 12. Upon information and belief, between March 27 and June 1, 2007, the online
15 magazine Celebrity Babylon published an article accusing Ronson of planting drugs in Lohan's
16 car and "setting up" Lohan for press photographers in exchange for money.

17 13. Upon information and belief, the article in Celebrity Babylon stated, *inter alia*:

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19 Celebrity Babylon has learned that while her DJ pal Samantha Ronson, 29, looks
20 like she's there to help her pal through thick and thin, she's really making a tidy
21 profit on the side, shilling Lohan, 20, out to photographers eager to get her photo
22 looking passed out and wasted. While an "out of it" Lohan thought she was just
23 going home after a night out at Teddy's in Hollywood on May 27, Ronson made a
24 side trip to a gas station. A source tells Celebrity Babylon, "The car was only down
25 a quarter tank, and yet Samantha stopped for gas. She has a side deal with a photo
26 agency and they paid her to make the pit stop!" If that wasn't shocking enough,
27 sources say that it was Ronson who was holding the cocaine later found in
28 Lindsay's car. "There were three of them crammed into the Mercedes sports car
and Samantha was the one that had the cocaine with her. Lindsay later questioned
her about leaving it in the car for the cops to find and Samantha blew her off."
Ronson, who makes anywhere from \$2,000 to \$3,000 a night deejaying at clubs
and private parties, has accumulated a substantial side income taking her pal in
front of paparazzi cameras for money.

1 14. The statements in the article concerning Ronson, reproduced above, are false and
2 libelous, and purport to state facts about Ronson which are false.

3 15. The article explicitly and unambiguously refers to Ronson.

4 16. The article refers to Ronson by name throughout, was made of and concerning
5 Ronson, and was so understood by those who read the article.

6 17. The statements about Ronson were falsely, maliciously, and intentionally published
7 by the Defendants and were known by Defendants to be false at the time they were made.
8 Defendants published these statements with actual malice and with the intent to cause harm to
9 Ronson.

10 18. Celebrity Babylon is publicly available on the Internet and has been viewed by and
11 communicated to an unknown number of third persons, including individuals in the State of
12 California and throughout the United States and the world.

13 19. The statements, including statements that Ronson had planted cocaine, have been
14 reproduced on numerous other celebrity gossip websites such as perezhilton.com, celebitchy.com,
15 socialitelifelife.com, hollyscoop.com, evilbeetgossip.com, poponthepop.blogspot.com, and
16 gossip.commongate.com.

17 20. On or about June 1, 2007, Defendant Lavandeira published an article on
18 PerezHilton.com that reproduced the above statements by Celebrity Babylon regarding Ronson.
19 In addition, Lavandeira added additional statements about Ronson including statements that
20 Ronson has been "toxic" to Lohan; that "According to new reports, Ronson has been selling out
21 Lohan to the paparazzi"; that Ronson "allegedly entered into an agreement with a photo agency to
22 tip them off to her whereabouts with Lindsay, even creating photo-ops for them"; that "the cocaine
23 that was found in Lohan's car after her crash may have been RONSON's!" (emphasis in original);
24 and that "With friends like Samantha Ronson, Lindsay doesn't need any enemies."

25 21. On or about June 13, 2007, Defendant Lavandeira published an article on
26 PerezHilton.com – under the headline "Blame Samantha!" – that stated "Was Lindsay Lohan
27 betrayed by her lezbot DJ pal Samantha Ronson? Australia's *NW* magazine seems to think so.
28 And we wouldn't disagree!" The article also contained a picture (apparently reproduced from a

1 magazine) of Defendant Lavandeira wearing a sweatshirt bearing the words in large capital letters,
2 "BLAME SAMANTHA," with a caption stating "Celeb gossip guru Perez Hilton has described
3 the DJ's influence on Lindsay's life as 'toxic' . . . and wears this top to prove his point."

4 22. Defendants knew that the statements about Ronson described above were false
5 and/or recklessly disregarded the falsity of these statements when they published them.

6 Defendants published these statements with actual malice and with the intent to cause harm to
7 Ronson.

8 23. The statements about Ronson are libelous on their face. They accuse Ronson of
9 criminal activity and expose her to hatred, contempt, ridicule and obloquy because they
10 inaccurately portray Ronson as a disloyal, dishonest friend who "sold out" and "set up" her friend
11 Lohan for personal financial gain.

12 24. The statements about Ronson adversely affect Ronson in her professional life as a
13 DJ and her reputation and Ronson has been damaged by their publication.

14 25. Defendants are liable to Plaintiff as a result of these false and defamatory
15 statements for actual, presumed and punitive damages in an amount to be determined at trial, but
16 not less than \$20,000,000.

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WHEREFORE, Plaintiff Samantha Ronson requests this Court:

A. For judgment against Defendants in an amount to be determined at trial, but not
less than \$20,000,000.

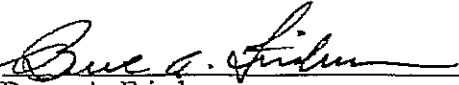
B. For interest, costs and disbursements of this action, including Plaintiff's reasonable
attorneys' fees; and

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C. For such other and further relief as may be just and proper.

Dated: June 26, 2007

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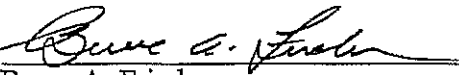
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JURY DEMAND

Plaintiff demands a trial by jury on all claims.

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