

Roland Tellis (*pro hac vice* to be filed)  
rtellis@baronbudd.com  
Jonas P. Mann (NJ Bar No. 020372007)  
jmann@baronbudd.com  
**BARON & BUDD, P.C.**  
15910 Ventura Boulevard, Suite 1600  
Encino, California 91436  
Telephone: (818) 839-2333  
Facsimile: (818) 986-9698

Raymond P. Boucher (*pro hac vice* to be filed)  
ray@boucher.la  
Brian Bush (*pro hac vice* to be filed)  
bush@boucher.la  
**BOUCHER LLP**  
21600 Oxnard Street, Suite 600  
Woodland Hills, California 91367  
Telephone: (818) 340-5400  
Facsimile: (818) 340-5401

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

LUCY PINDER, CORA SKINNER,  
and SARA UNDERWOOD,

Plaintiffs,

v.

MAG ENTERTAINMENT, LLC,  
d/b/a CHEERLEADERS NEW  
JERSEY GENTLEMEN'S CLUB,

Defendant.

Docket No.

**COMPLAINT FOR:**

- (1) Misappropriation of Likeness;
- (2) Unfair Competition, 15 U.S.C. § 1125(a);
- (3) Unfair Competition, N.J.S.A. 56:4-1;
- (4) Unfair Competition;
- (5) Consumer Fraud, N.J.S.A. 56:8-1.

**Jury Trial Demanded**

Plaintiffs Lucy Pinder, Cora Skinner, and Sara Underwood (“Plaintiffs”) set forth and allege as follows:

## **INTRODUCTION AND PARTIES**

### **A. Plaintiffs**

1. Plaintiff Lucy Pinder (“Pinder”) is, and at all times relevant to this action was, a professional model and actress, and a resident of Winchester, United Kingdom.

2. Plaintiff Cora Skinner (“Skinner”) is, and at all times relevant to this action was, a professional model and actress, and a resident of Santa Monica, Los Angeles County, California.

3. Plaintiff Sara Underwood (“Underwood”) is, and all times relevant to this action was, a professional model and actress, and a resident of Portland, Multnomah County, Oregon.

### **B. Defendant**

4. Upon information and belief, Defendant MAG Entertainment, LLC, (“Defendant”) is a limited liability company organized and existing under the laws of the State of New Jersey with a principal place of business at 54 Crescent Blvd., Gloucester City, Camden County, New Jersey.

5. Upon information and belief, Defendant is now, and at all times mentioned herein was, the operator of the Cheerleaders New Jersey Gentlemen’s

Club (“Cheerleaders”), which is an strip club, located at 54 Crescent Blvd., Gloucester City, Camden County, New Jersey.

6. Upon information and belief, Defendant owns and/or operates a website (<http://cheerleadersnj.com/>) and various social media accounts, including Facebook (<https://www.facebook.com/cheerleadersnewjersey/>) and Twitter (<https://twitter.com/cheerleadersnj>), through which it promotes its business, solicits customers, and advertises events for Cheerleaders.

7. Upon information and belief, Defendant has, and at all times mentioned herein had, control over the contents of its website and social media accounts.

### **JURISDICTION AND VENUE**

8. This Court has federal question jurisdiction over this action under 28 U.S.C. § 1331 because Plaintiffs allege violations of 15 U.S.C. §1125, *et seq.* (the Lanham Act).

9. Venue is proper in this Court under 28 U.S.C. § 1391 because the Defendant is located in this judicial district.

### **FACTUAL BACKGROUND**

10. Each Plaintiff is a professional model and actress who earns a living by commercializing her identity, image, and likeness through negotiated, arms-length transactions with reputable commercial brands and companies.

11. A model's reputation directly impacts the commercial value associated with the use of her image, likeness, or identity to promote a product or service.

12. Each Plaintiff expended and continues to expend substantial efforts, resources, and time in building her reputation in the modeling industry.

13. Each Plaintiff carefully considers the reputation, brand, and type of good or service advertised by any potential client prior to authorizing the use of her image or likeness.

14. Each Plaintiff's career in modeling, acting, and/or private enterprise has substantial value derived from the goodwill and reputation each has built. Each Plaintiff commands substantial sums of money for the licensed commercial use of her image.

15. Defendant has brazenly and repeatedly, without consent, misappropriated Plaintiffs' images and likenesses and used them in its advertisements for its strip club.

16. Defendant's use of Plaintiffs' images and likeness was for Defendants' commercial benefit and falsely suggests Plaintiffs' sponsorship, affiliation, and participation in Defendant's business.

17. Defendant never sought or obtained permission for any use of any of Plaintiffs' images.

18. None of the Plaintiffs has ever agreed, nor would they have agreed, to any use by Defendant of their images or likenesses to promote Defendant's business.

19. Defendant has never paid any of the Plaintiffs for its unauthorized use of their images or likenesses.

20. True and correct copies of Defendant's unauthorized use of Plaintiffs' images and likenesses are attached hereto as Exhibits 1-5.

21. Plaintiffs, by certified mail on July 31, 2017, demanded that Defendants cease and desist use of their images and likenesses.

22. Defendant did not respond to Plaintiffs' cease and desist letter and Defendant's use of Plaintiffs' images and likenesses is ongoing.

23. Defendant's unauthorized use of Plaintiffs' images and likenesses is knowing, willful, and intentional.

### **PLAINTIFFS' ALLEGATIONS**

24. Plaintiffs re-state and re-allege paragraphs 1-23 above, and incorporate the same by reference as though fully set forth herein.

#### ***Plaintiff Lucy Pinder***

25. Plaintiff Pinder is a model, actress, and businesswoman and is one of Britain's most famous glamour models. Plaintiff Pinder is well known not only in the United Kingdom but also internationally, including in the United States.

26. Plaintiff Pinder has appeared in numerous publications including *Nuts*, *Loaded*, *The Daily Star*, and *FHM*. Plaintiff Pinder appeared on *FHM*'s list of the "100 Sexiest Women in the World" in 2005, 2006, and 2007 and was a guest columnist in *Nuts*.

27. Plaintiff Pinder collaborated with major brands including the U.K.'s National Lottery and global consumer products giant Unilever in national and international advertising campaigns.

28. In addition to her modeling career, Plaintiff Pinder has established an acting career with both television and film credits. Plaintiff Pinder was a presenter on MTV and a contestant on *Celebrity Big Brother* and had starring roles in *The Seventeenth Kind*, *Age of Kill*, and *Warrior Savitri*.

29. Plaintiff Pinder lends her celebrity to worthy charities and is involved in fundraising for Tiger Time, The David Shepherd Wildlife Foundation, and International Animal Rescue. Plaintiff Pinder worked with Help for Heroes appearing in a fundraising calendar and visited coalition troops in Afghanistan in 2007.

30. Plaintiff Pinder is in an elite class of Social Media Influencers and has over 1.4 million followers on Facebook, 489,000 followers on Twitter, and 129,000 followers on Instagram.

31. In all prior instances of authorized commercial marketing and promotion of her image, likeness or identity by third parties, Plaintiff Pinder

negotiated and expressly granted authority for such use pursuant to agreed-upon terms and conditions and for agreed-upon compensation.

32. Defendant has never hired or contracted with Plaintiff Pinder to advertise, promote, market or endorse Defendant's business.

33. In the images used by the Defendant to promote its business and advertise upcoming events, Plaintiff is readily identifiable in that any person seeing the photographs with the naked eye can reasonably determine that the person depicted is Plaintiff Pinder.

34. Defendant's appropriation of the images of Plaintiff Pinder was for the purpose of advertising or soliciting patronage of the Defendant's establishment.

35. Defendant has never sought Plaintiff Pinder's permission, nor did Plaintiff give Defendant permission to use the images to advertise and promote its club.

36. Defendant has never compensated Plaintiff for any use of her likeness or images.

37. Defendant had actual knowledge that it was using Plaintiff Pinder's images without compensation or consent. Accordingly, Defendant knowingly misappropriated Plaintiff Pinder's images and identity in total disregard of Plaintiff's rights.

38. Defendant derived a direct commercial benefit from its unauthorized use of Plaintiff Pinder's images and likeness.

39. As a direct and proximate result of Defendant's unauthorized use of the likenesses and images of Plaintiff Pinder, Defendant made profits or gross revenues in an amount to be established at trial.

40. As a further direct and proximate result of the wrongful conduct set forth above, the value of Plaintiff Pinder's images and likenesses has been diluted due to Defendant's unauthorized use of the same.

41. Plaintiff Pinder has further been damaged as a direct and proximate result of Defendant's unauthorized use, as she has lost their exclusive right to control the commercial exploitation of her name, photographs, and likenesses, resulting in damages, the total amount of which to be established by proof at trial.

42. Upon information and belief, Defendant's unauthorized use of the images described herein permitted, encouraged, or facilitated other persons, firms, and other entities to misappropriate Plaintiff Pinder's image in promoting their own businesses. In doing so, Defendant has further damaged Plaintiff Pinder.

***Plaintiff Cora Skinner***

43. Plaintiff Skinner is a model, actress, presenter, and businesswoman.

44. Plaintiff Skinner has appeared in numerous publications including *Maxim* (the American, Spanish, and Belgian editions), *FHM*, *Muscle & Fitness*, and *Playboy*.



45. Plaintiff Skinner has appeared in advertising campaigns for well-known brands and companies including Sketchers, Aether Apparel, Monari Clothing, GUESS, Sears, Palms Casino, and Nordstrom.

46. Plaintiff Skinner has appeared as a presenter at the Emmys and Spike TV's Scream Awards.

47. Plaintiff Skinner has an established acting career and appeared in *Las Vegas*, *Shark*, *Deal or No Deal*, *Chuck*, *Rules of Engagement*, *CSI: Miami*, and *The Office*.

48. Plaintiff Skinner is established on social media with over 90,000 combined followers on Facebook, Twitter, and Instagram.

49. In all prior instances of authorized commercial marketing and promotion of her image, likeness or identity by third parties, Plaintiff Skinner negotiated and expressly granted authority for such use pursuant to agreed-upon terms and conditions and for agreed-upon compensation.

50. Defendant has never hired or contracted with Plaintiff Skinner to advertise, promote, market or endorse Defendant's business.

51. In the images used by the Defendant to promote its business and advertise upcoming events, Plaintiff is readily identifiable in that any person seeing the photographs with the naked eye can reasonably determine that the person depicted is Plaintiff Skinner.

52. Defendant's appropriation of the images of Plaintiff Skinner was for the purpose of advertising or soliciting patronage of the Defendant's establishment.

53. Defendant has never sought Plaintiff Skinner's permission, nor did Plaintiff give Defendant permission to use the images to advertise and promote its club.

54. Defendant has never compensated Plaintiff Skinner for any use of her likeness or images.

55. Defendant had actual knowledge that it was using Plaintiff Skinner's images without compensation or consent. Accordingly, Defendant knowingly misappropriated Plaintiff Skinner's images and identity in total disregard of Plaintiff's rights.

56. Defendant derived a direct commercial benefit from its unauthorized use of Plaintiff Skinner's images and likeness.

57. As a direct and proximate result of Defendant's unauthorized use of the likenesses and images of Plaintiff Skinner, Defendant made profits or gross revenues in an amount to be established at trial.

58. As a further direct and proximate result of the wrongful conduct set forth above, the value of Plaintiff Skinner's images and likenesses has been diluted due to Defendant's unauthorized use of the same.

59. Plaintiff Skinner has further been damaged as a direct and proximate result of Defendant's unauthorized use, as she has lost their exclusive right to

control the commercial exploitation of her name, photographs, and likenesses, resulting in damages, the total amount of which to be established by proof at trial.

60. Upon information and belief, Defendant's unauthorized use of the images described herein permitted, encouraged, or facilitated other persons, firms, and other entities to misappropriate Plaintiff Skinner's image in promoting their own businesses. In doing so, Defendant has further damaged Plaintiff Skinner.

***Plaintiff Sara Underwood***

61. Plaintiff Underwood is a model, actress, and businesswoman.

62. Plaintiff Underwood has appeared in *Playboy* and was chosen Playmate of the Month for the July 2006 issue and Playmate of the Year in 2007.

63. Plaintiff Underwood has appeared as a television presenter, working as for the Blackbelt TV cable network, hosting episodes of G4's Attack of the Show, and was a regular presenter on The Feed.

64. Plaintiff Underwood is an extremely elite Social Media Influencer with over 4.7 million followers on Facebook, 598,000 followers on Twitter, and 8.2 million followers on Instagram.

65. In all prior instances of authorized commercial marketing and promotion of her image, likeness or identity by third parties, Plaintiff Underwood negotiated and expressly granted authority for such use pursuant to agreed-upon terms and conditions and for agreed-upon compensation.

66. Defendant has never hired or contracted with Plaintiff Underwood to advertise, promote, market or endorse Defendant's business.

67. In the images used by the Defendant to promote its business and advertise upcoming events, Plaintiff is readily identifiable in that any person seeing the photographs with the naked eye can reasonably determine that the person depicted is Plaintiff Underwood.

68. Defendant's appropriation of the images of Plaintiff Underwood was for the purpose of advertising or soliciting patronage of the Defendant's establishment.

69. Defendant has never sought Plaintiff Underwood's permission, nor did Plaintiff give Defendant permission to use the images to advertise and promote its club.

70. Defendant has never compensated Plaintiff Underwood for any use of her likeness or images.

71. Defendant had actual knowledge that it was using Plaintiff Underwood's images without compensation or consent. Accordingly, Defendant knowingly misappropriated Plaintiff Skinner's images and identity in total disregard of Plaintiff's rights.

72. Defendant derived a direct commercial benefit from its unauthorized use of Plaintiff Underwood's images and likeness.

73. As a direct and proximate result of Defendant's unauthorized use of the likenesses and images of Plaintiff Underwood, Defendant made profits or gross revenues in an amount to be established at trial.

74. As a further direct and proximate result of the wrongful conduct set forth above, the value of Plaintiff Underwood's images and likenesses has been diluted due to Defendant's unauthorized use of the same.

75. Plaintiff Underwood has further been damaged as a direct and proximate result of Defendant's unauthorized use, as she has lost their exclusive right to control the commercial exploitation of her name, photographs, and likenesses, resulting in damages, the total amount of which to be established by proof at trial.

76. Upon information and belief, Defendant's unauthorized use of the images described herein permitted, encouraged, or facilitated other persons, firms, and other entities to misappropriate Plaintiff Underwood's image in promoting their own businesses. In doing so, Defendant has further damaged Plaintiff Underwood.

## **COUNT I**

### **Misappropriation of Likeness**

77. Plaintiffs re-state and re-allege paragraphs 1 through 76 above, and incorporate the same by reference as though fully set forth herein.

78. Plaintiffs have a right to control the commercial use of their names, images, and likenesses. Under New Jersey law, the unauthorized use of a person's image or likeness for a predominately commercial purpose is unlawful.

79. Defendant's use of Plaintiffs' images and likenesses to advertise its strip club business constitutes a use for commercial purposes.

80. Defendant's use of Plaintiffs' photographs and likenesses did not occur in connection with the dissemination of news or information and was without a redeeming public interest or historical value.

81. Defendant never obtained Plaintiffs' consent for the use of their images and likenesses.

82. Defendant's use of each Plaintiffs' photographs and likenesses was willful and deliberate.

83. As a direct and proximate result of Defendant's scheme to create the false impression that Plaintiffs were affiliated with and/or performed at Defendant's strip club, Defendant enjoyed increased revenues and profits.

84. As a further direct and proximate result of Defendant's deliberate and willful conduct, Plaintiffs have suffered actual damages in an amount to be established at trial.

**COUNT II**

**Unfair Competition / False Endorsement**

**Lanham Act, 15 U.S.C. §1125(a)**

85. Plaintiffs re-state and re-allege paragraphs 1 through 84 above, and incorporate the same by reference as though fully set forth herein.

86. Plaintiffs, through their careers in modeling, advertising, and acting, have all attained significant fame and celebrity.

87. Each Plaintiff enjoys a substantial social media following and has appeared in publications, television, and movies as described above.

88. Each Plaintiff earns her living by commercializing her identity for use by reputable brands and services through arms-length negotiated transactions.

89. Each Plaintiff possesses a valid and protectable mark in the form of her persona, image, likeness, and identity.

90. Each Plaintiff has, and at all times mentioned herein, possessed, maintained, and safeguarded her exclusive right to control the use of her persona, image, likeness, and identity.

91. Prior to authorizing the use of her image, likeness, or identity, each Plaintiff carefully considers the reputation of the potential client and the good or service being promoted.

92. Without consent, Defendant placed Plaintiffs' images and likeness on advertisements promoting its strip club business.

93. In Defendant's advertisements that contain Plaintiffs' images and likenesses, Plaintiffs are clearly depicted and readily identifiable.

94. Plaintiffs and the Defendant are all in the entertainment industry and use similar marketing channels, including social media.

95. Defendant misappropriated Plaintiffs' images and likenesses in order to create the false impression that Plaintiffs are somehow affiliated with, have endorsed, or otherwise participate in Defendant's strip club business.

96. Defendant never sought any Plaintiffs' consent to use her image or likeness.

97. Plaintiffs never participated in, affiliated with, or endorsed Defendant's strip club business.

98. Plaintiffs would not agree to allow their image or likeness to be used to promote Defendant's strip club business.

99. Defendant, at all times mentioned herein, knew that it had no right to use Plaintiffs' images or likenesses to promote its strip club business.

100. Plaintiffs, through their careers in modelling and acting, are well known among the customer base Defendant sought to reach with its advertisements.

101. Indeed, Defendant chose Plaintiffs precisely because of their level of recognition among the demographic of consumers Defendant targets with its advertisements.



102. Defendant clearly intended to create the false impression that Plaintiffs performed at or otherwise endorsed Defendant's business.

103. Defendant placed the misappropriated images on the very same marketing channels (i.e. Facebook, Instagram, and Twitter) used by Plaintiffs to promote themselves.

104. Defendant's misappropriation of Plaintiffs' images is likely to cause confusion as to Plaintiffs' affiliation with, sponsorship of, and/or participation in Defendant's strip club business.

105. Upon information and belief, Defendant's misappropriation has caused actual confusion among consumers as to Plaintiffs' affiliation with, endorsement of, and participation in Defendant's strip club business.

106. Defendant knew or should have known that, given Plaintiffs' careers as professional models, obtaining the right to use their images and likenesses would have required consent and compensation.

107. Defendant's repeated and brazen unauthorized use of Plaintiffs' images and likenesses, without seeking their consent, constitutes willful and deliberate conduct.

108. As a direct and proximate result of Defendant's scheme to create the false impression that Plaintiffs were affiliated with and/or performed at Defendant's strip club, Defendant enjoyed increased revenues and profits.

109. As a further direct and proximate result of Defendant's deliberate and willful conduct, Plaintiffs have suffered actual damages in an amount to be established at trial.

### **COUNT III**

#### **Unfair Competition / False Endorsement**

##### **N.J.S.A. 56:4-1, et seq.**

110. Plaintiffs re-state and re-allege paragraphs 1 through 109 above, and incorporate the same by reference as though fully set forth herein.

111. The aforesaid acts of Defendant's unauthorized use of Plaintiffs' images and likenesses in connection with creating the false impression that they were affiliated with and endorsed Defendant's business constitutes unfair competition under N.J.S.A. 56:4-1.

112. As a direct and proximate result of Defendant's scheme to create the false impression that Plaintiffs were affiliated with and/or performed at Defendant's strip club, Defendant enjoyed increased revenues and profits.

113. As a further direct and proximate result of Defendant's deliberate and willful conduct, Plaintiffs have suffered actual damages in an amount to be established at trial.

114. Defendant's wrongful and deliberate conduct has caused significant damage to Plaintiffs, both directly and indirectly, and Plaintiffs respectfully request treble damages as authorized by N.J.S.A. 56:4-2.

**COUNT IV**

**Common Law Unfair Competition**

115. Plaintiffs re-state and re-allege paragraphs 1 through 114 above, and incorporate the same by reference as though fully set forth herein.

116. The aforesaid acts of Defendant's unauthorized use of Plaintiffs' images and likenesses in connection with creating the false impression that they were affiliated with and endorsed Defendant's business constitutes unfair competition under the common law of New Jersey.

117. As a direct and proximate result of Defendant's scheme to create the false impression that Plaintiffs were affiliated with and/or performed at Defendant's strip club, Defendant enjoyed increased revenues and profits.

118. As a further direct and proximate result of Defendant's deliberate and willful conduct, Plaintiffs have suffered actual damages in an amount to be established at trial.

**WHEREFORE**, Plaintiffs respectfully pray for judgment against Defendant as follows:

1. For actual, consequential, and incidental damages in an amount to be proven at trial;
2. For the amount due, owing and unpaid to Plaintiffs representing the fair market value of their services;

3. For trebling of damages;
4. For punitive damages in an amount to be proven at trial;
5. For prejudgment interest in an amount proscribed by law;
6. For disgorgement of Defendant's profits;
7. For costs of this lawsuit including reasonable attorney's fees; and
8. For such other and further relief as to this court seem just, proper and equitable.

**JURY DEMAND**

Plaintiffs hereby demand trial by jury as to all issues in the above matter.

Date: August 10, 2017

Respectfully submitted,

BARON & BUDD, P.C.

s/ Jonas P. Mann

---

Jonas P. Mann  
jmann@baronbudd.com

Roland Tellis  
rtellis@baronbudd.com  
**BARON & BUDD, P.C.**  
15910 Ventura Boulevard, Suite 1600  
Encino, California 91436  
Telephone: (818) 839-2333  
Facsimile: (818) 986-9698

Raymond P. Boucher  
ray@boucher.la  
**BOUCHER LLP**  
21600 Oxnard Street, Suite 600  
Woodland Hills, California 91367  
Telephone: (818) 340-5400  
Facsimile: (818) 340-5401

# EXHIBIT 1

Search

Lauren Home 20+



**Cheerleaders New Jersey**  
 Like This Page - February 12, 2015 - 🌐

Free Lunch Buffet Today starting at 4pm!

### Sara Underwood

👍 Like    💬 Comment    ➦ Share

👍 2



**Chryssy Marie Smith** Eating at a club is raunchy 😊  
 lol just saying  
 Like · Reply · February 16, 2015 at 8:23pm



Write a comment...    😊 📷 GIF 🗨️

Friend Requests See All



**Judy Levy**  
 8 mutual friends  
 ➦ Confirm Friend

# EXHIBIT 2





Cheerleaders New Jersey  
@cheerleadersnewjersey

- Home
- About
- Photos
- Reviews
- Videos
- Belly
- Events
- Poll
- Posts
- Community

Create a Page

Like Follow Recommend ...

1 share

Write a comment...



Cheerleaders New Jersey  
November 26, 2015

### Lucy Pinder

Happy thanksgiving from all of us at Cheerleaders New Jersey! We're closed today but will resume normal hours tomorrow at noon xo



Like Comment Share

7

Write a comment...

Watch Video Message

Search for posts on this Page

Visitor Posts



Nguyen Nhu  
July 14 at 12:03pm

ABADASS CHEERLEADER ❤️❤️😄😄  
<https://goo.gl/QhrAwf>

Like Comment



Steff Smith  
May 19 at 12:17pm

Tonight 9pm - 2am 🍷🐰🍻

Like Comment



Steff Smith  
March 31 at 3:01pm

COME ENJOY YOURSELVES AND HELP ME CELEBRATE MY BDAY

Like Comment

English (US) · Español · Português (Brasil) · Français (France) · Deutsch

Privacy · Terms · Advertising · Ad Choices · Cookies · More



# EXHIBIT 3



**Cheerleaders NJ** @Cheerleadersnj · 26 Nov 2015



Happy Thanksgiving from all of us at Cheerleaders Nj! We're closed today but will resume normal hours tomorrow xo [pic.twitter.com/QkLWWtYNrv](http://pic.twitter.com/QkLWWtYNrv)



1

3

5

# EXHIBIT 4



Cheerleaders New Jersey @cheerleadersnewjersey Home About Photos Reviews Videos Belly Events Poll Posts Community Create a Page

Like Follow Recommend ...

Watch Video Message

Write a comment...

Search for posts on this Page

Cheerleaders New Jersey Cora Skinner December 25, 2015

Merry Christmas from all of us at Cheerleaders NJ! We're closed today but will reopen tomorrow starting at 2pm



Like Comment Share

7 Write a comment...

Visitor Posts

Nguyen Nhu July 14 at 12:03pm ABADASS CHEERLEADER https://goo.gl/QhnAwf Like Comment

Steff Smith May 19 at 12:17pm Tonight 9pm - 2am Like Comment

Steff Smith March 31 at 3:01pm COME ENJOY YOURSELVES AND HELP ME CELEBRATE MY BDAY Like Comment

English (US) Español Portuguese (Brasil) Français (France) Deutsch

Privacy Terms Advertising Ad Choices Cookies More Facebook © 2017

- Heather Roberge 150
Grant Burton 25
Nicole Levy 15
Pat Burton
Debra Lieberman Ka... 14
Jillian Levy
Brendon Levy
Blake Levy 100
Mana Rutteneberg V... 100
Wayne Lieberman 200
Marty Lieberman 40
Mark Talise 100
Luocana Kai 200
Piscilla Szabo 100
Jason Lawrence 70
Laure Knoot 70
Lauren Wedmeier 10
Jule Anna Burton 50
Suzanne Phillips Ann 10
Mike Pasqua 10
Jaymee Theresa 10
Jesenia Gallegos 70
Chame Tang 90
Rachel Larin Talise 200
Kyoko Rashid 20

Turn on chat to see who's available.

Search

# EXHIBIT 5

**Cheerleaders NJ**  
@Cheerleadersnj

Tweets  
**2,667**

Following  
**3,311**

Followers  
**5,847**

Likes  
**3,160**

**Follow**

### Cora Skinner



**Cheerleaders NJ** @Cheerleadersnj · 25 Dec 2015

Merry Christmas from all of us at Cheerleaders NJ! We're closed today but will reopen tomorrow starting at 2pm

