

Assigned for all purposes to: Stanley Mosk Courthouse, Judicial Officer: Dennis Landin

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6

7  
8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

10 ELIZABETH M. KAPLAN, an individual

11 Plaintiff,

12 vs.

13  
14 AARON KAPLAN, an individual; BURTON  
A. MITCHELL, an individual; and JEFFER  
15 MANGELS BUTLER & MITCHELL LLP, a  
California limited liability partnership; and  
16 DOE DEFENDANTS 1 through 10,

17 Defendants.  
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CASE NO: 20STCV13781

**ELIZABETH M. KAPLAN'S  
ORIGINAL COMPLAINT**

**Against Aaron Kaplan**

1. **NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**
2. **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
3. **COMMON LAW INTRUSION INTO PRIVATE AFFAIRS**
4. **VIOLATIONS OF CALIFORNIA PENAL CODE § 632**
5. **VIOLATIONS OF CALIFORNIA PENAL CODE § 634**
6. **INVASION OF CONSTITUTIONAL RIGHT OF PRIVACY, CAL. CONSTITUTION, ART. 1, § 1**
7. **FRAUDULENT CONCEALMENT**

**Against Mitchell & JMBM**

8. **AIDING AND ABETTING**
9. **CONSPIRACY**
10. **DECLARATORY RELIEF (C.C.P. § 1060)**

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**JURY TRIAL DEMANDED**

**INTRODUCTION**

1. This is a case about betrayal. The facts are set forth below.
2. With this action Elizabeth seeks to recover damages and exemplary damages.
3. The allegations in this complaint are based on Elizabeth’s personal knowledge, on investigation by her counsel, and on information and belief.

**THE PARTIES**

**The Plaintiff—Elizabeth M. Kaplan (“Elizabeth”)**

4. Elizabeth is the widowed mother of a ten-year-old son, Parker Kaplan (“Parker”). Elizabeth was married nearly 10 years to Joe Kaplan (“Joe”) before he died on July 27, 2018. Parker is Elizabeth’s son by Joe.

5. Elizabeth and Parker reside in Los Angeles County. They have resided in Los Angeles County at all times relevant to this action.

**Defendant Aaron Kaplan (“Aaron”)**

6. Aaron Kaplan is Joe Kaplan's younger brother. Aaron is a successful, long-time television executive. He was the worldwide head of scripted television at William Morris Agency before he left the agency to start Kapital Entertainment. Aaron was listed in *Deadline’s* “Overachievers List” for “Pilot Season 2020.”

7. Upon information and belief, Aaron resides in Los Angeles and has resided in Los Angeles at all times relevant to this action.

**Defendant Burton A. Mitchell (“Mitchell”)**

8. Mitchell is an attorney licensed to practice law in California. His California State Bar number is 79317. Mitchell has been certified by the State Bar of California as a specialist in Taxation Law.

9. Mitchell is the “Mitchell” in Jeffer Mangels Butler & Mitchell. As of April 07,

1 2020, Mitchell was identified on JMBM’s website as the firm’s Assistant Managing Partner.  
2 Mitchell serves as the chair of JMB’s Taxation and Trusts & Estates practice groups.

3 10. Mitchell may be served with process at Jeffer Mangels Butler & Mitchell LLP,  
4 1900 Avenue of the Stars, 7th Floor, Los Angeles, CA 90067.

5 **Defendant Jeffer Mangels Butler & Mitchell LLP (“JMBM”)**

6 11. JMBM is a law firm. Upon information and belief, JMBM is a limited liability  
7 partnership organized under California law. According to the firm’s website, JMBM is ranked in  
8 *American Lawyer’s* AmLaw 200 list.

9 12. JMBM’s main office is located in Los Angeles, California.

10 13. JMBM may be served with process as follows: Bruce P. Jeffer, Managing Partner,  
11 or Burton A. Mitchell, Assistant Managing Partner, Jeffer Mangels Butler & Mitchell LLP, 1900  
12 Avenue of the Stars, 7<sup>th</sup> Floor, Los Angeles, CA 90067.

13 **Doe Defendants 1-10 (C.C.P. § 474)**

14 14. Elizabeth does not know the true names and capacities—whether individual,  
15 corporate, associate, or otherwise—of Doe Defendants 1 through 10, inclusive. These fictitious  
16 defendants are sued pursuant to Code of Civil Procedure section 474. Upon information and  
17 belief, each Doe Defendant was in some manner responsible for, participated in, or contributed  
18 to the matters and things Elizabeth alleges in this complaint. Consequently, each Doe Defendant  
19 bears legal responsibility. If and when Elizabeth learns the nature and identity of these Doe  
20 Defendants, Elizabeth will seek leave to amend this complaint, if and as necessary.

21 15. To the extent contrary to the allegations contained in this complaint, and as an  
22 alternative theory, Elizabeth is informed, believes, and thereon alleges, that at all times relevant  
23 to this complaint each of the defendants was the agent or employee of the remaining defendants,  
24 was at all times acting within the scope of such agency or employment, and actively participated  
25 in, or subsequently ratified and adopted, or both, the acts and omissions alleged in this  
26 complaint, with full knowledge of all the facts and circumstances, including but not limited to  
27 full knowledge of each and all of the violations of Elizabeth's rights. Any particular defendant’s  
28 liability might be based on principles of *respondeat superior* or some other theory of vicarious

1 liability.

2 **JURISDICTION & VENUE**

3 16. This Court may properly assert personal jurisdiction over these parties under Code  
4 of Civil Procedure section 410.10. Elizabeth Kaplan, Aaron Kaplan, and Burt Mitchell reside in  
5 Los Angeles, California and resided in Los Angeles, California at all times relevant to this  
6 action. JMBM is a limited liability partnership organized under California law, and each of  
7 JMBM's three offices is located in California.

8 17. This Court may properly assert subject-matter jurisdiction over this action.  
9 Elizabeth is asserting claims under California law, and the amount in controversy exceeds this  
10 Court's jurisdictional minimum.

11 18. Venue in this Court is proper under Code of Civil Procedure sections 395 and  
12 395.5. Elizabeth Kaplan, Aaron Kaplan, and Burt Mitchell reside in Los Angeles County.  
13 JMBM's principal office is located in Los Angeles County. The injuries occurred in Los  
14 Angeles County, and each defendant's liability arose in Los Angeles County.

15 19. This action may not be properly removed to federal court because there is no basis  
16 for federal jurisdiction. There is no federal question, and there is no diversity between Elizabeth  
17 and any of the defendants.

18 **FACTS**

19 20. Elizabeth Kaplan (then Elizabeth McAdams) met Joe Kaplan in 2006. They began  
20 living together in 2007. They were married on October 26, 2008.

21 21. Elizabeth and Joe have a son together—Parker. Parker is ten years old.

22 22. Joe died on July 27, 2018, while he and Elizabeth were on vacation in Bermuda.

23 23. Elizabeth returned home late in the evening on July 31, 2018.

24 24. The next day, August 1, 2018, Elizabeth's mother—Maria Cervini—joined  
25 Elizabeth at Elizabeth and Parker's home in Malibu. Mrs. Cervini came to help her daughter and  
26 her grandson deal with their grief and shock in the aftermath of Joe's death.

27 25. On or about August 15, 2018, Mrs. Cervini was in one of the closets in Elizabeth's  
28 master bedroom suite. It was the closet that was primarily used by Joe before he died. Mrs.

1 Cervini noticed a small white object on a shelf above her head. She climbed on a stepladder to  
2 take the object off the shelf and see what it was. It was a tiny Arlo wireless recording device.

3 26. When Mrs. Cervini realized it was a camera, she screamed. She placed her finger  
4 over the lens and pried the battery from the device.

5 27. Minutes later, Elizabeth and her mother went back into the closet. There they  
6 discovered a second Arlo wireless recording device. This one was tucked under the bill of a  
7 baseball cap on the top shelf opposite the wall from the shelves where Mrs. Cervini found the  
8 first device.

9 28. Upon information and belief, this second device was aimed in a way that it peered  
10 directly into the other closet in Elizabeth's master bedroom suite. This other closet was the  
11 closet primarily used by Elizabeth. It's where Elizabeth would dress and undress. It's where  
12 Elizabeth would pick out and put on her bra and her underwear. It's where Elizabeth would pick  
13 out and put on her nightgown.

14 29. Upon information and belief, this second Arlo device was aimed in a way that it  
15 would capture activity in the narrow passageway between the master bedroom and the master  
16 bathroom. Elizabeth would walk in this passageway naked, or in her bra and underwear, or only  
17 partially clothed.

18 30. Elizabeth later found an Arlo wireless router attached to the communication cables  
19 in her home.

20 31. Upon information and belief, these Arlo devices have motion sensors to initiate  
21 recording. These devices also are capable of recording images even in near-darkness.

22 32. Upon information and belief, these two hidden cameras were streaming images  
23 and sounds to a device to which Aaron has access or had access, and on which he watched and  
24 listened to the video and audio recorded and transmitted by these hidden devices.

25 33. Aaron has acknowledged in writing that he installed these hidden recording  
26 devices or had them installed. Aaron also indicated that he installed these hidden recording  
27 devices upon advice from Mitchell of JMBM.

28 34. Mitchell has confirmed his role in causing these hidden devices to be secretly

1 installed in Elizabeth and Parker's home. In communications with Elizabeth's current probate  
2 counsel (not her counsel in this matter), Mitchell acknowledged telling Aaron that he could  
3 install these recording devices in Elizabeth's home.

4 35. In a May 13, 2019 e-mail to an attorney representing Aaron, Elizabeth's probate  
5 counsel insisted that Aaron turn over "all original and copies of all audio and video recordings  
6 taken inside the Malibu house in Aaron's possession, custody or control . . . ." Aaron's attorney  
7 replied almost a month later, in a June 11, 2019 letter to Elizabeth's probate counsel. Aaron,  
8 through his attorney, refused to turn over the unlawful recordings. Instead, Aaron, through his  
9 attorney, doubled down on his unlawful conduct and threatened Elizabeth with "legal  
10 proceedings."

11 36. Elizabeth did not consent to Aaron or anyone else installing hidden recording  
12 devices anywhere in her home, certainly not in a dressing closet in the master bedroom suite, and  
13 most certainly not a device that would peer into the passageway between her bedroom and her  
14 bathroom or into the closet where she dressed. Nor did Elizabeth consent to anyone entering her  
15 home for any unlawful purpose.

16 **EXHIBITS ATTACHED TO THIS COMPLAINT**

17 37. There are seven exhibits attached to this complaint.

18 38. Exhibit 1 contains two diagrams depicting where Elizabeth and her mother found  
19 the hidden recording devices. These diagrams are not drawn to scale. They have been provided  
20 to help the Court visualize and better understand the facts set forth above.

21 39. Exhibit 2 contains photographs of the Arlo recording devices described above.

22 40. Exhibit 3 is a photograph of the Arlo router and the electronics closet where  
23 Elizabeth found the router.

24 41. Exhibit 4 is a photo depicting the passageway between the master bedroom and the  
25 master bathroom, viewed from the master bedroom. The two closets described above are on  
26 either side of the narrow passageway leading to the master bathroom. The closet where Aaron  
27 secretly installed the hidden devices is on the right. The closet where Elizabeth dresses is on the  
28 left.



1 client, as Elizabeth was a client of Mitchell and JMBM.

2 **THE COMMUNICATIONS BETWEEN AARON KAPLAN**  
3 **AND MITCHELL/JMBM ARE NOT PRIVILEGED**

4 48. The attorney-client privilege does not apply to Aaron's communications with  
5 Mitchell and JMBM because of the crime-fraud exception to the attorney-client privilege.  
6 Moreover, to the extent the privilege applies, Aaron waived this privilege by repeatedly and  
7 voluntarily disclosing that Mitchell and JMBM had advised Aaron to secretly install these hidden  
8 recording devices in Elizabeth's home.

9 **CAUSES OF ACTION**

10 49. To the extent any of the causes of action alleged below, or any of the allegations  
11 set forth below, are inconsistent or contradictory, Elizabeth alleges them in the alternative.

12 **1<sup>st</sup> CAUSE OF ACTION:**

13 **NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

14 **(Against Aaron Kaplan & Doe Defendants 1-10)**

15 50. Elizabeth incorporates here the allegations set forth above in paragraphs 1 through  
16 49.

17 51. Aaron acted negligently in installing the hidden electronic recording devices in  
18 Elizabeth's home.

19 52. Elizabeth suffered serious emotional distress.

20 53. Aaron's negligence was a substantial factor in causing Elizabeth serious emotional  
21 distress.

22 54. Elizabeth was harmed in an amount in excess of this court's minimum jurisdiction,  
23 in an amount to be determined at trial, according to proof.

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**2<sup>nd</sup> CAUSE OF ACTION:**

**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

**(Against Aaron Kaplan & Doe Defendants 1-10)**

- 55. Elizabeth incorporates here the allegations set forth above in paragraphs 1 through 49.
- 56. Aaron’s conduct was outrageous.
- 57. Aaron intended to cause Elizabeth emotional distress. In the alternative, Aaron acted with reckless disregard causing Elizabeth to suffer severe emotional distress when she learned that he had spied on her in the intimate spaces of her master bedroom and dressing area.
- 58. Elizabeth suffered severe emotional distress.
- 59. Aaron’s conduct was a substantial factor in causing Elizabeth severe emotional distress.
- 60. Aaron acted with “malice,” “oppression,” or “fraud” as Civil Code section 3294 defines these terms. Elizabeth therefore seeks an award of exemplary damages for Aaron’s misconduct, in an amount to be determined at trial.

**3<sup>rd</sup> CAUSE OF ACTION:**

**COMMON LAW INTRUSION INTO PRIVATE AFFAIRS**

**(Against Aaron Kaplan & Doe Defendants 1-10)**

- 61. Elizabeth incorporates here the allegations set forth above in paragraphs 1 through 49.
- 62. Elizabeth had a reasonable expectation of privacy in her home’s master bedroom suite, which includes her dressing closet and the closet in which Aaron Kaplan had installed the hidden Arlo recording devices separated by a narrow passageway leading to the master bathroom.
- 63. Aaron intentionally intruded in Elizabeth’s master bedroom suite..
- 64. Aaron’s intrusion would be highly offensive to a reasonable person.
- 65. Elizabeth was harmed, in an amount to be determined at trial.

1 66. Aaron's conduct was a substantial factor in causing Elizabeth's harm.

2 67. Aaron acted with "malice," "oppression," or "fraud" as Civil Code section 3294  
3 defines these terms. Elizabeth therefore seeks an award of exemplary damages for Aaron's  
4 misconduct, in an amount to be determined at trial.

5  
6 **4<sup>th</sup> CAUSE OF ACTION:**

7 **VIOLATIONS OF CALIFORNIA PENAL CODE § 632**

8 **(Against Aaron Kaplan & Doe Defendants 1-10)**

9 68. Elizabeth incorporates here the allegations set forth above in paragraphs 1 through  
10 49.

11 69. Aaron used electronic video and audio recording devices to eavesdrop upon and to  
12 record Elizabeth's confidential communications, which were made in a private setting.

13 70. Elizabeth did not consent to being recorded, and she reasonably expected that her  
14 private communications, made in a private setting, would not be recorded.

15 71. Aaron acted intentionally.

16 72. Elizabeth seeks the greater of \$5,000 for each violation or three times her actual  
17 damages, whichever is greater, under California Penal Code section 637.2.

18  
19 **5<sup>th</sup> CAUSE OF ACTION:**

20 **VIOLATIONS OF CALIFORNIA PENAL CODE § 634**

21 **(Against Aaron Kaplan & Doe Defendants 1-10)**

22 73. Elizabeth incorporates here the allegations set forth above in paragraphs 1 through  
23 49.

24 74. Aaron trespassed into Elizabeth and Parker's home, including Elizabeth's master  
25 bedroom suite, for the purpose of committing acts, or attempting to commit acts, in violation of  
26 California Penal Code section 632.

27 75. Elizabeth did not consent for Aaron or anyone else entering her and Parker's home  
28 for the purpose of committing acts, or attempting to commit acts, in violation of California Penal

1 Code section 632.

2 76. Elizabeth seeks the greater of \$5,000 for each violation or three times her actual  
3 damages, whichever is greater, under California Penal Code section 637.2.

4  
5 **6<sup>th</sup> CAUSE OF ACTION:**

6 **INVASION OF CONSTITUTIONAL RIGHT OF PRIVACY**

7 **CALIFORNIA CONSTITUTION, ART. 1, § 1**

8 **(Against Aaron Kaplan & Doe Defendants 1-10)**

9 77. Elizabeth incorporates here the allegations set forth above in paragraphs 1 through  
10 49.

11 78. Elizabeth had a legally protected privacy interest in the master bedroom suite of  
12 her home, including the closets in her master bedroom.

13 79. Elizabeth had a reasonable expectation of privacy.

14 80. Aaron's secret, unauthorized installation of hidden electronic video and audio  
15 recording devices constitutes a serious invasion of Elizabeth's privacy.

16 81. Aaron's actions caused Elizabeth to suffer damages in an amount to be determined  
17 at trial.

18 82. Aaron acted with "malice," "oppression," or "fraud" as Civil Code section 3294  
19 defines these terms. Elizabeth therefore seeks an award of exemplary damages for Aaron's  
20 actions, in an amount to be determined at trial, according to proof.

21  
22 **7<sup>th</sup> CAUSE OF ACTION:**

23 **FRAUDULENT CONCEALMENT**

24 **(Against Aaron Kaplan & Doe Defendants 1-10)**

25 83. Elizabeth incorporates here the allegations set forth above in paragraphs 1 through  
26 49.

27 84. Aaron and Elizabeth were in a fiduciary relationship. Since Joe Kaplan's death,  
28 Aaron has been serving as the trustee of Joe Kaplan's separate property trust. Elizabeth is a

1 beneficiary of this trust.

2 85. Aaron intentionally failed to disclose to Elizabeth that he had secretly installed  
3 hidden electronic audio-video recording devices in one of the closets in the master bedroom suite  
4 of Elizabeth and Parker's home. Aaron also failed to disclose that one of these devices peered  
5 into the passageway between the master bedroom and the master bathroom and into Elizabeth's  
6 dressing closet.

7 86. Aaron also intended that Elizabeth would not and could not find these devices. He  
8 hid them, or obscured them, or placed them where Elizabeth could not and would not find them.

9 87. Elizabeth did not know that Aaron had installed these hidden electronic audio-  
10 video recording devices.

11 88. Aaron intended to deceive Elizabeth by concealing these facts.

12 89. Had Elizabeth known that Aaron had installed these devices, she would have  
13 behaved differently.

14 90. Elizabeth was harmed in an amount to be determined at trial, according to proof.

15 91. Aaron's concealment was a substantial factor in causing Elizabeth's harm.

16 92. Aaron acted with "malice," "oppression," or "fraud" as Civil Code section 3294  
17 defines these terms. Elizabeth therefore seeks an award of exemplary damages for Aaron's  
18 actions, in an amount to be determined at trial, according to proof.

19  
20 **8<sup>th</sup> CAUSE OF ACTION:**

21 **AIDING AND ABETTING**

22 **(Against Mitchell, JMBM & Doe Defendants 1-10)**

23 93. Elizabeth incorporates here the allegations set forth above in paragraphs 1 through  
24 49.

25 94. Mitchell and JMBM knew that Aaron Kaplan was going to commit the torts set  
26 forth above in the 1st, 2nd, 3rd, 4th, 5th, 6th and 7th Causes of Action.

27 95. Mitchell and JMBM advised Aaron to commit the misconduct set forth above in  
28 the 1st, 2nd, 3rd, 4th, 5th, 6th and 7th Causes of Action. The allegations in those causes of

1 action are incorporated here.

2 96. Mitchell and JMBM gave substantial assistance or encouragement to Aaron  
3 Kaplan.

4 97. Mitchell and JMBM were a substantial factor in causing harm to Elizabeth.

5 98. Mitchell and JMBM acted with “malice,” “oppression,” or “fraud” as Civil Code  
6 section 3294 defines these terms. Elizabeth, therefore, seeks an award of exemplary damages for  
7 Mitchell and JMBM’s aiding and abetting, in an amount to be determined at trial.

8  
9 **9<sup>th</sup> CAUSE OF ACTION:**

10 **CONSPIRACY**

11 **(Against Mitchell, JMBM & Doe Defendants 1-10)**

12 99. Elizabeth incorporates here the allegations set forth above in paragraphs 1 through  
13 49.

14 100. Mitchell and JMBM knew that Aaron Kaplan (and perhaps others) intended to  
15 violate Elizabeth’s rights of privacy under the California Constitution and California common  
16 law by secretly installing hidden electronic recording devices in one of Elizabeth’s master  
17 bedroom closets. Mitchell and JMBM also knew that Aaron Kaplan and perhaps others intended  
18 to violate the protections afforded to Elizabeth by California Penal Code sections 632, 634,  
19 647(j)(1), and 647(j)(3) by secretly installing hidden electronic video and audio recording  
20 devices in one of Elizabeth’s master bedroom closets.

21 101. Mitchell and JMBM agreed with Aaron (and perhaps others) to commit these  
22 unlawful acts.

23 102. Mitchell and JMBM acted with “malice,” “oppression,” or “fraud” as Civil Code  
24 section 3294 defines these terms. Elizabeth therefore seeks an award of exemplary damages, in  
25 an amount to be determined at trial.

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10<sup>th</sup> CAUSE OF ACTION:

DECLARATORY RELIEF UNDER C.C.P. § 1060

(Against Mitchell, JMBM & Doe Defendants 1-10)

103. Elizabeth incorporates here the allegations set forth above in paragraphs 1 through 49.

104. Elizabeth entered into a written fee agreement with JMBM. This agreement is dated June 29, 2009.

105. The agreement contains an arbitration clause.

106. An actual controversy exists between Elizabeth and Mitchell/JMBM. Mitchell and JMBM have initiated an arbitration against Elizabeth (but not for the claims that Elizabeth alleges against Mitchell and JMBM in this complaint).

107. Elizabeth seeks a declaration that her fee agreement with JMBM is unenforceable because JMBM and Mitchell failed to disclose obvious and known conflicts. *See Sheppard, Mullin, Richter & Hampton, LLP v. J-M Mfg. Co., Inc.* (2018) 6 Cal.5th 59.

108. In the alternative, Elizabeth seeks a declaration that grounds exist for the revocation of the written fee agreement, the arbitration clause, or both. *See* C.C.P. § 1281.2(b).

109. In the alternative, Elizabeth seeks a declaration that the claims she has alleged against Mitchell and JMBM in this complaint should not be subject to arbitration under Code of Civil Procedure section 1281.2(c).

**PRAYER FOR RELIEF**

**Declaratory Relief**

Elizabeth prays that this Court issue an order declaring that the June 29, 2009 retainer agreement between Elizabeth and JMBM is void and unenforceable. In the alternative, Elizabeth prays that this Court issue an order declaring that grounds exist for the revocation of her written fee agreement with JMBM, or for the revocation of the arbitration clause in that agreement, or both (C.C.P. § 1281.2(b)). Elizabeth further prays, in the alternative, for a declaration that the claims she has alleged against Mitchell and JMBM in this complaint should not be subject to

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1 arbitration under Code of Civil Procedure sections 1281.2(c).

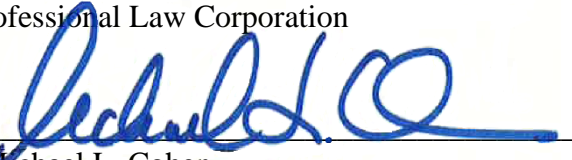
2 **Damages & Other Relief**

3 Elizabeth prays that this Court enter judgment in her favor and against each of the  
4 defendants, jointly and severally, as follows:

- 5 1. for the 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup>, 6<sup>th</sup>, 7<sup>th</sup>, 8<sup>th</sup> and 9<sup>th</sup> Causes of Action alleged above, Elizabeth's  
6 actual damages, in an amount to be determined at trial
- 7 2. for Aaron Kaplans's violations of the California Penal Code (4<sup>th</sup> and 5<sup>th</sup> Causes of  
8 Action alleged above), the maximum statutory penalty allowed or three times  
9 Elizabeth's actual damages, whichever is greater
- 10 3. for those causes of action that permit the recovery of exemplary damages, an  
11 award of exemplary damages, in an amount to be determined at trial
- 12 4. for pre- and post-judgment interest to the maximum extent California law allows
- 13 5. for taxable costs
- 14 6. for all other relief, whether at law or in equity, to which Elizabeth is justly entitled.

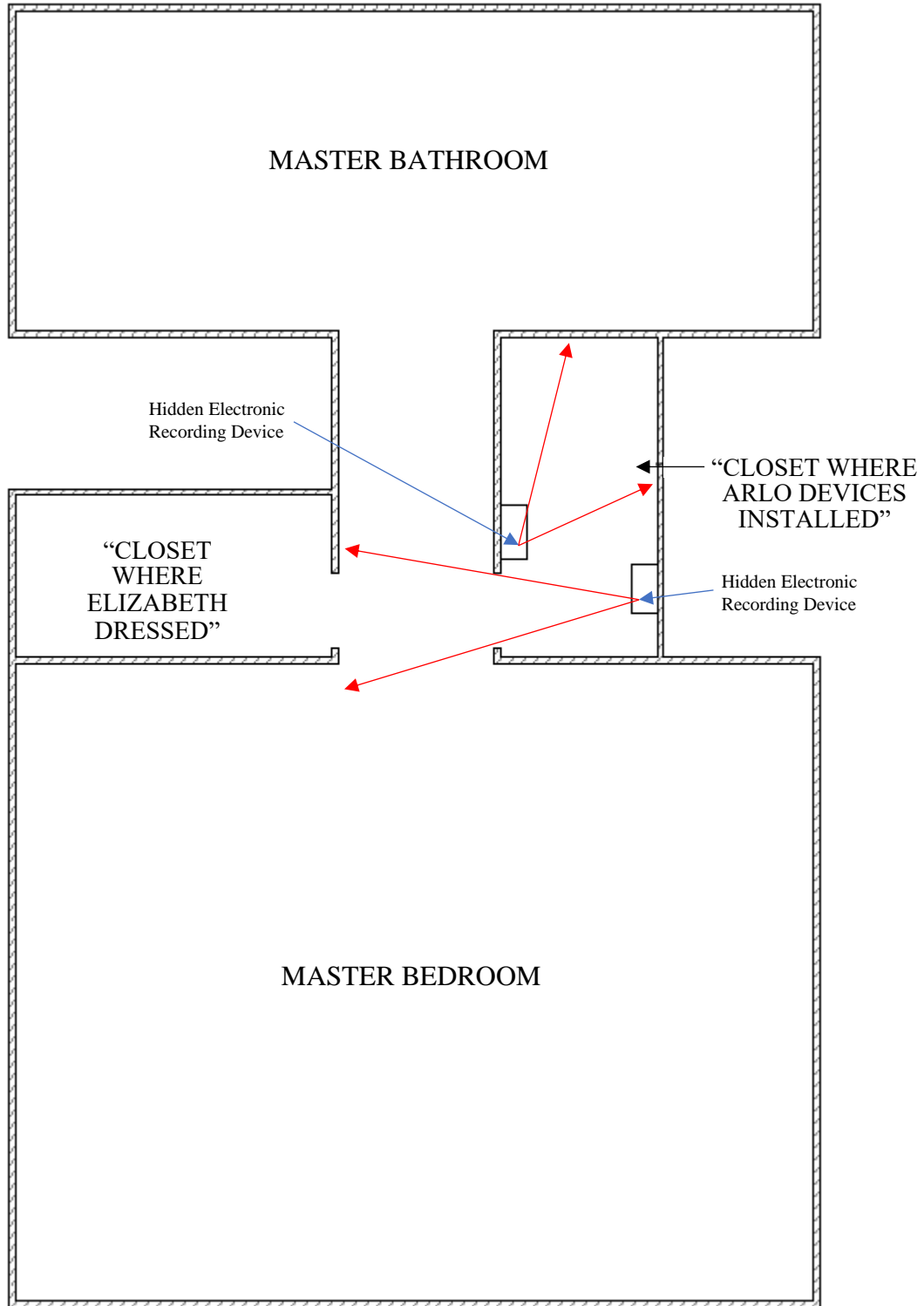
15 Dated: April 8, 2020

Michael L. Cohen,  
A Professional Law Corporation

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18 BY:   
19 Michael L. Cohen  
20 Attorney for the Plaintiff,  
21 Elizabeth M. Kaplan  
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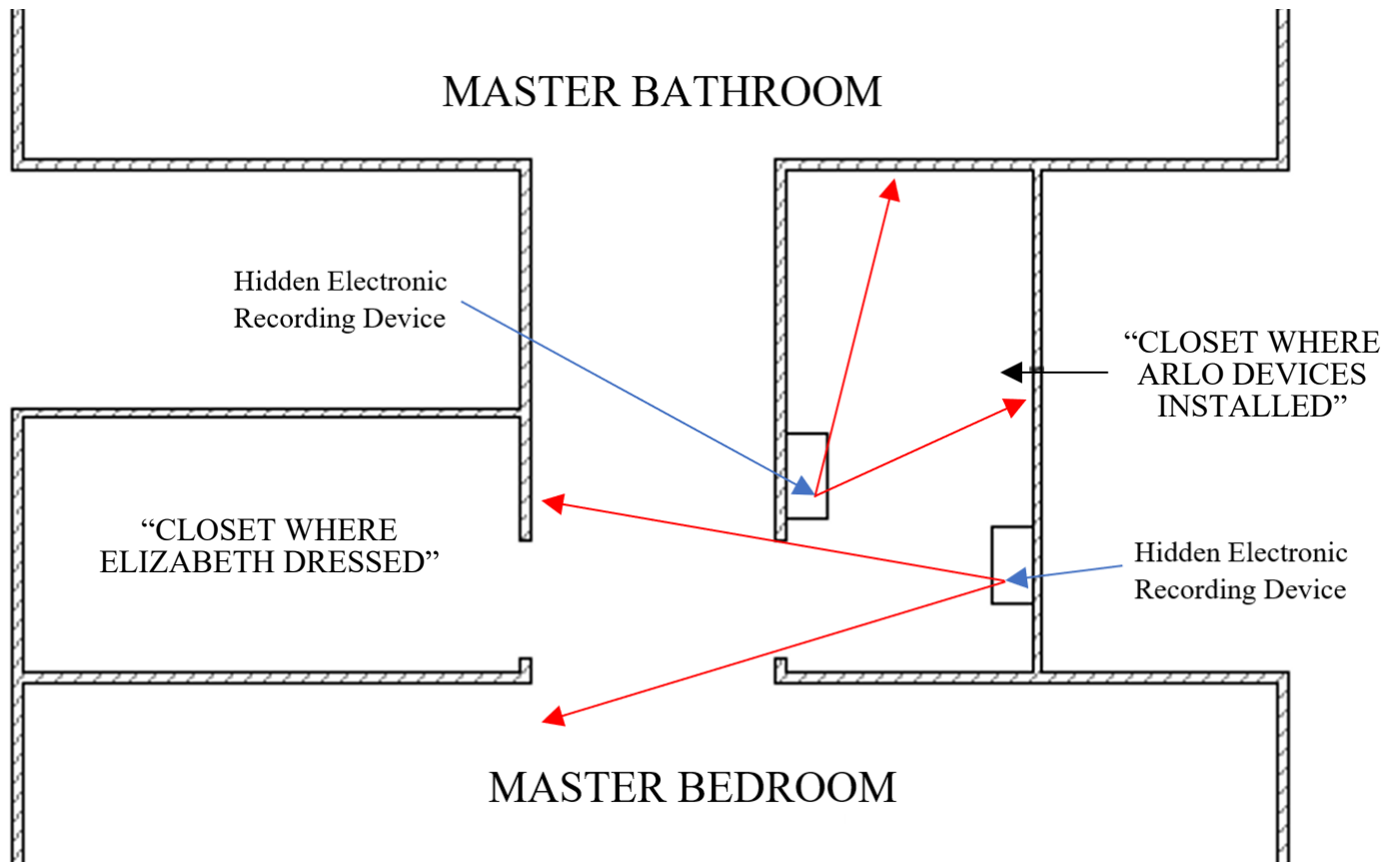
# EXHIBIT 1





**EXHIBIT 5A**

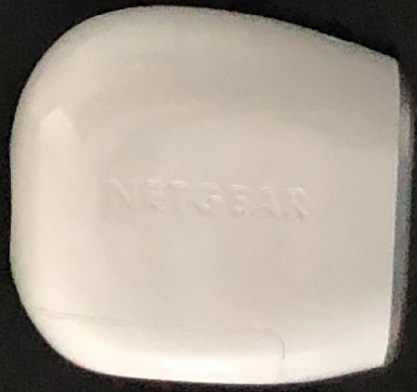
**The Layout of Elizabeth Kaplan’s  
Master Bedroom Suite & the Two Closets**



**EXHIBIT 5B**

**The Layout of Elizabeth Kaplan’s  
Master Bedroom Suite & the Two Closets**

# EXHIBIT 2



Model No: A-1B 二次鋰電池組

Rating: 7.2V 17.57Wh

Rechargeable Li-ion Battery

Min. Capacity: 2440mAh

Charging voltage: 8.4V

P/N: 308-10046-01

NETGEAR

Made in China

2ICP7/34/40-2

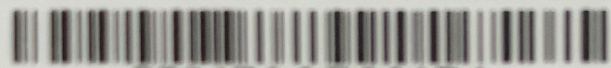
請參閱電池使用安全須知



PS E 7.2Vdc 2.44Ah

R45130 鋰電池請回收 2440mAh

WARNING: Do not crush, puncture, short external contacts or dispose of in fire or water. Do not expose to temperatures above 80°C (140°F). Replace only with batteries designed for this product. Read instructions before using the battery.



55617AAR021D1

Model No: A-1B 二次鋰電池組

Rating: 7.2V 17.57Wh

Rechargeable Li-ion Battery

Min. Capacity: 2440mAh

Charging voltage: 8.4V

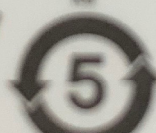
P/N: 308-10046-01

NETGEAR

Made in China

2ICP7/34/40-2

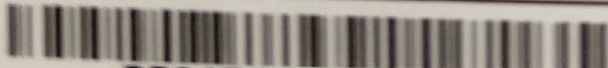
請參閱電池使用安全須知



PS E 7.2Vdc 2.44Ah

R45130 鋰電池請回收 2440mAh

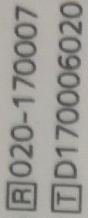
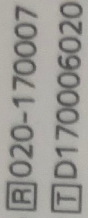
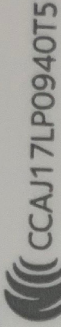
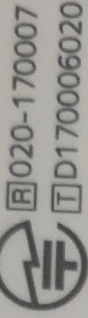
WARNING: Do not crush, puncture, short external contacts or dispose of in fire or water. Do not expose to temperatures above 80°C (140°F). Replace only with batteries designed for this product. Read instructions before using the battery.



55617AAS021D2

# NETGEAR® Arlo Base Station

Arlo Pro 無線監控系統基地台  
Model/型號/型号: VMB4000



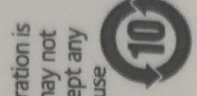
NETGEAR INTL LTD  
Building 3, University Technology Centre  
Curraheen Road, Cork, Ireland  
CMIIT ID: 2017DJ0930  
FCC ID: PY316200350 IC: 4054A-16200350



S/N  
序列号  
4R057B7BA29D8

MAC  
9C3DC9F933E8D

This device complies with Part 15 of the FCC Rules. Operation is subject to the following two conditions: (1) this device may not cause harmful interference, and (2) this device must accept any interference received, including interference that may cause undesired operation. CAN ICES-3 (B)/NMB-3(B)



NETGEAR, INC. Input/輸入/输入: 12V===1.5A

Made in Vietnam

D38488  
272-12668-04

Model No: A-18 278838 9A  
Rating: 7.2V 1.5A  
Rechargeable Li-ion Battery  
Min. Capacity: 2400mAh  
Charging voltage: 8.4V  
PIN: 308-10048-01

NETGEAR  
Made in China  
20CP19A-0-2

65617AAR021D1

# EXHIBIT 3



arlo

SONOS

Integra  
DVD  
-15.7

CLOROX  
DISINFECTING  
WIPE



# EXHIBIT 4



# EXHIBIT 5



# EXHIBIT 6



# EXHIBIT 7

