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2 SCOTT A. EDELMAN, SBN 116927
3 2029 Century Park East
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8 Attorneys for Plaintiff
9 LEONARD NORMAN COHEN

10 SUPERIOR COURT, STATE OF CALIFORNIA
11 COUNTY OF LOS ANGELES

12 LEONARD NORMAN COHEN, an
13 individual,

14 Plaintiff,

15 v.

16 KELLEY A. LYNCH, an individual,

17 Defendant.

CASE NO. BC 341120

18 **PLAINTIFF'S CASE SUMMARY**
19 **PURSUANT TO CRC 388 IN SUPPORT**
20 **OF DEFAULT JUDGMENT AGAINST**
21 **DEFENDANT KELLEY A. LYNCH**

Hon. Kenneth R. Freeman, Department 64

Date of filing
of complaint: October 11, 2005

Request for Court Default Judgment,
Declaration of Leonard Norman Cohen and
[Proposed] Judgment Filed Concurrently
Herewith

22 Plaintiff Leonard Norman Cohen ("Cohen"), a Los Angeles resident, is a critically
23 acclaimed singer/songwriter/author/poet and has been active as a recording artist for more
24 than five decades. Defendant Kelley A. Lynch ("Lynch"), also a Los Angeles resident, was
25 Cohen's business manager and personal assistant for nearly seventeen years until October
26 2004, when she was terminated for cause upon Cohen's discovery that she had defrauded him
out of millions of dollars.

27 During the course of Lynch's employment, Cohen developed a strong sense of respect
28 for Lynch's professional capabilities and trusted her to handle many aspects of his life so that

1 he could spend more time focusing on his creative and other personal endeavors. As such
2 and in that capacity, Lynch maintained in her possession various files and other personal and
3 work-related items and documents that belonged to Cohen.

4 Upon her termination in October 2004, Lynch vacated her office and removed many of
5 the contents maintained therein to her home, located at 2648 Mandeville Canyon Road, Los
6 Angeles, California 90049. Despite having been terminated from Cohen's employment in all
7 respects, Lynch wrongfully withheld from Cohen – and blatantly denied maintaining
8 possession of – many items of Cohen's personal property, including but not limited to
9 personal and business correspondence, original manuscripts, personal journals containing
10 Cohen's drawings, poems and other writings, as well as original watercolor paintings created
11 by Cohen.

12 When Cohen recently discovered that Lynch did, in fact, have possession of his
13 belongings, he filed this action on October 11, 2005 and simultaneously sought an *ex parte*
14 writ of possession, which Commissioner Greenberg in Department 66 of Los Angeles
15 Superior Court granted on October 13, 2005. Pursuant to that writ, the Los Angeles County
16 Sheriff's Department recovered numerous boxes of Cohen's belongings from Lynch's home
17 on October 18 and 24, 2005.

18 Although she was personally served on October 11, 2005, Lynch never responded to
19 the complaint. The clerk of this court entered default against Lynch on December 6, 2005.
20 Cohen now seeks a default judgment in this action adjudging and decreeing that he is the
21 rightful owner of the property obtained pursuant to the writ of possession.

22
23 DATED: January 19, 2006

GIBSON, DUNN & CRUTCHER LLP
SCOTT A. EDELMAN

24
25
26 By: 
27 Scott A. Edelman

Attorneys for Plaintiff
LEONARD NORMAN COHEN

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**CALIFORNIA STATE COURT
CERTIFICATE OF SERVICE**

I, Barbara Siddell, certify as follows:

I am employed in the County of Los Angeles, State of California; I am over the age of eighteen years and am not a party to this action; my business address is 333 South Grand Avenue, Los Angeles, California 90071-3197, in said County and State. On January 19, 2006, I served the following document(s):

**PLAINTIFF'S CASE SUMMARY PURSUANT TO CRC 388 IN
SUPPORT OF DEFAULT JUDGMENT AGAINST DEFENDANT
KELLEY A. LYNCH**

on the parties stated below, by placing a true copy thereof in an envelope addressed as shown below by the following means of service:

Robert H. Hishon, Esq. (404) 817-7791 Telephone
The Hishon Firm, LLC (404) 817-2486 Fax
1201 Peachtree Street, N.E., Suite 1000
Atlanta, Georgia 30361

Nancy E. Lucas, Esq. (310) 215-7529 Telephone
Haight, Brown & Bonesteel, LLP (877) 349-9860 Fax
6080 Center Drive, Suite 800
Los Angeles, CA 90045
eMail: lucasn@hbblaw.com

Kelley Lynch (310) 254-5775 Telephone
2648 Mandeville Canyon Road
Los Angeles, CA 90049

SERVICE BY MAIL: I placed a true copy in a sealed envelope addressed as indicated above, on the above-mentioned date. I am familiar with the firm's practice of collection and processing correspondence for mailing. It is deposited with the U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

SERVICE BY MAIL – DEPOSITING IN A U.S. POSTAL SERVICE MAIL BOX: By depositing true copies thereof enclosed in sealed envelopes addressed to the parties in the within action with postage thereon fully prepaid in a United States Postal Service mail box at Los Angeles, California, addressed as follows

BY PERSONAL SERVICE: I placed a true copy in a sealed envelope addressed to each person[s] named at the address[es] shown and giving same to a messenger for personal delivery before 5:00 p.m. on the above-mentioned date.

BY FACSIMILE: I caused each such document to be transmitted by facsimile machine, to the parties and numbers indicated above. The facsimile machine I used complied with Rule 2003(3).

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- BY UPS NEXT DAY AIR:** On the above-mentioned date, I placed a true copy of the above mentioned document(s), together with an unsigned copy of this declaration, in a sealed envelope or package designated by the United Parcel Service with delivery fees paid or provided for, addressed to the person(s) as indicated above and deposited same in a box or other facility regularly maintained by United Parcel Service or delivered same to an authorized courier or driver authorized by United Parcel Service to receive documents.
 - I am employed by a member of the bar of this court, and the foregoing document(s) was(were) printed on recycled paper.
 - (STATE)** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

9 Executed on January 19, 2006.

10 
11 _____
12 Barbara Siddell

1 GIBSON, DUNN & CRUTCHER LLP
2 SCOTT A. EDELMAN, SBN 116927
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6 Telephone: (310) 552-8500
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8 Attorneys for Plaintiff
9 LEONARD NORMAN COHEN

10 SUPERIOR COURT, STATE OF CALIFORNIA
11 COUNTY OF LOS ANGELES

12 LEONARD NORMAN COHEN, an
13 individual,

14 Plaintiff,

15 v.

16 KELLEY A. LYNCH, an individual,

17 Defendant.

CASE NO. BC 341120

DECLARATION OF LEONARD
NORMAN COHEN IN SUPPORT OF
DEFAULT JUDGMENT AGAINST
DEFENDANT KELLEY A. LYNCH

Hon. Kenneth R. Freeman, Department 64

Date of filing
of complaint: October 11, 2005

Plaintiff's Case Summary Pursuant to CRC
388 in Support of Default Judgment Against
Defendant Kelley A. Lynch, Request for
Court Default Judgment, and [Proposed]
Judgment Filed Concurrently Herewith

20 I, LEONARD NORMAN COHEN, declare as follows:

21 I am over the age of eighteen and am plaintiff in the above-captioned action. The
22 following facts are within my personal knowledge and, if called and sworn as a witness, I
23 could and would testify competently thereto.
24

25 1. I am a singer/songwriter/author/poet, and I have been active as a recording artist,
26 composer and writer for over five decades. My fourteen albums and published writings reach
27 audiences all over the world.
28

1 2. Defendant Kelley A. Lynch was my business manager and personal assistant from
2 about 1987 until October 2004, when I learned that she had stolen millions of dollars from
3 my personal and investment bank accounts. After investigating the extensive irregularities, I
4 terminated her employment and took steps to prevent her from being able to access any of my
5 financial accounts.

6 3. Up until my discovery of Ms. Lynch's deceit, I trusted her abilities and loyalty a
7 great deal and relied upon her to handle many aspects of both my business and personal life
8 so that I could spend more time focused on my creative endeavors.

9 4. As my personal assistant and business manager, Ms. Lynch kept in her office many
10 of my original business and personal files, correspondence and other items of personal
11 property. As Ms. Lynch was also responsible for overseeing my finances and business
12 relationships, she held documents from my accountants and various contacts in the literary
13 and musical worlds. Ms. Lynch maintained all of these items, and I never had a set of copies.

14 5. Upon her termination, Ms. Lynch vacated her office. I understood that she
15 removed most of the contents of the offices to her home at 2648 Mandeville Canyon Road,
16 Los Angeles, California 90049.

17 6. After investigation into the possibility that Ms. Lynch retained in her possession
18 many items of my personal property, I commenced this action against her on October 11,
19 2005 in order to recover that property. I simultaneously sought, through my attorneys, an *ex*
20 *parte* writ of possession because Ms. Lynch's home was set for foreclosure and I believed that
21 my personal property was at great risk of being imminently lost, concealed, transferred,
22 damaged or destroyed due to Ms. Lynch's erratic, bizarre and spiteful behavior.

23 7. My *ex parte* application for a writ of possession was granted by the Los Angeles
24 Superior Court on October 13, 2005.

25 8. I understand that the Los Angeles County Sheriff, pursuant to the writ of
26 possession, visited Ms. Lynch's home on October 18, 2005 and again on October 24, 2005
27 and removed a number of boxes containing my personal property.

28 9. I have since had the opportunity to review the contents of those boxes, and they do

1 indeed contain property that belongs to me, including but by no means limited to the
2 following:

- 3 • Three of my original manuscripts
- 4 • Several of my personal journals, including some with sketches, drawings and poetry
- 5 • Original song lyrics (handwritten and typed)
- 6 • Personal photographs of my children, myself, and my family members
- 7 • My Canadian passport
- 8 • An original tape recording of my single "Heart On"
- 9 • Personal Correspondence addressed to me
- Three PROCAN awards
- Books
- Various business-related documents

10 10. Needless to say, all these items are of a personal nature, and some are of great
11 sentimental value to me. Moreover, because my work has found favor in the world, many of
12 these items have significant value as memorabilia to collectors, historical preservation
13 societies and academic institutions. Ms. Lynch, however, had and has no ownership interest
14 in any of these items.

15
16 I declare under penalty of perjury under the laws of the State of California that the foregoing
17 is true and correct and that I executed this Declaration on the 19th day of January, 2006 at
18 Los Angeles, California.

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23 _____
Leonard Norman Cohen

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**CALIFORNIA STATE COURT
CERTIFICATE OF SERVICE**

I, Barbara Siddell, certify as follows:

I am employed in the County of Los Angeles, State of California; I am over the age of eighteen years and am not a party to this action; my business address is 333 South Grand Avenue, Los Angeles, California 90071-3197, in said County and State. On January 19, 2006, I served the following document(s):

**DECLARATION OF LEONARD NORMAN COHEN IN SUPPORT OF
DEFAULT JUDGMENT AGAINST DEFENDANT KELLEY A. LYNCH**

on the parties stated below, by placing a true copy thereof in an envelope addressed as shown below by the following means of service:

Robert H. Hishon, Esq. (404) 817-7791 Telephone
The Hishon Firm, LLC (404) 817-2486 Fax
1201 Peachtree Street, N.E., Suite 1000
Atlanta, Georgia 30361

Nancy E. Lucas, Esq. (310) 215-7529 Telephone
Haight, Brown & Bonesteel, LLP (877) 349-9860 Fax
6080 Center Drive, Suite 800
Los Angeles, CA 90045
eMail: lucasn@hbblaw.com

Kelley Lynch (310) 254-5775 Telephone
2648 Mandeville Canyon Road
Los Angeles, CA 90049

SERVICE BY MAIL: I placed a true copy in a sealed envelope addressed as indicated above, on the above-mentioned date. I am familiar with the firm's practice of collection and processing correspondence for mailing. It is deposited with the U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

SERVICE BY MAIL – DEPOSITING IN A U.S. POSTAL SERVICE MAIL BOX: By depositing true copies thereof enclosed in sealed envelopes addressed to the parties in the within action with postage thereon fully prepaid in a United States Postal Service mail box at Los Angeles, California, addressed as follows

BY PERSONAL SERVICE: I placed a true copy in a sealed envelope addressed to each person[s] named at the address[es] shown and giving same to a messenger for personal delivery before 5:00 p.m. on the above-mentioned date.

BY FACSIMILE: I caused each such document to be transmitted by facsimile machine, to the parties and numbers indicated above. The facsimile machine I used complied with Rule 2003(3).

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- BY UPS NEXT DAY AIR:** On the above-mentioned date, I placed a true copy of the above mentioned document(s), together with an unsigned copy of this declaration, in a sealed envelope or package designated by the United Parcel Service with delivery fees paid or provided for, addressed to the person(s) as indicated above and deposited same in a box or other facility regularly maintained by United Parcel Service or delivered same to an authorized courier or driver authorized by United Parcel Service to receive documents.
 - I am employed by a member of the bar of this court, and the foregoing document(s) was(were) printed on recycled paper.
 - (STATE)** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

9 Executed on January 19, 2006.


Barbara Siddell

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): SCOTT A. EDELMAN, SBN 116927 GIBSON DUNN & CRUTCHER LLP 2029 Century Park East, Suite 4000, Los Angeles, CA 90067 TELEPHONE NO.: (310) 552-8500 FAX NO. (Optional): (310) 552-8741 E-MAIL ADDRESS (Optional): sedelman@gibsondunn.com ATTORNEY FOR (Name): Plaintiff Leonard Norman Cohen	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles, California 90012 BRANCH NAME: Stanley Mosk Courthouse	
PLAINTIFF/PETITIONER: Leonard Norman Cohen DEFENDANT/RESPONDENT: Kelley A. Lynch	
REQUEST FOR (Application) <input type="checkbox"/> Entry of Default <input type="checkbox"/> Clerk's Judgment <input checked="" type="checkbox"/> Court Judgment	CASE NUMBER: <div style="text-align: center; font-size: 1.2em;">BC 341120</div>

1. TO THE CLERK: On the complaint or cross-complaint filed
- a. on (date): October 11, 2005
 - b. by (name): Plaintiff Leonard Norman Cohen
 - c. Enter default of defendant (names):
 - d. I request a court judgment under Code of Civil Procedure sections 585(b), 585(c), 989, etc., against defendant (names):
 Kelley A. Lynch

(Testimony required. Apply to the clerk for a hearing date, unless the court will enter a judgment on an affidavit under Code Civ. Proc., § 585(d).)

- e. Enter clerk's judgment
 - (1) for restitution of the premises only and issue a writ of execution on the judgment. Code of Civil Procedure section 1174(c) does not apply. (Code Civ. Proc., § 1169.)
 Include in the judgment all tenants, subtenants, named claimants, and other occupants of the premises. The *Prejudgment Claim of Right to Possession* was served in compliance with Code of Civil Procedure section 415.46.
 - (2) under Code of Civil Procedure section 585(a). (Complete the declaration under Code Civ. Proc., § 585.5 on the reverse (item 5).)
 - (3) for default previously entered on (date):

2. Judgment to be entered.

	<u>Amount</u>	<u>Credits acknowledged</u>	<u>Balance</u>
a. Demand of complaint	\$ 0	\$	\$
b. Statement of damages *			
(1) Special	\$	\$	\$
(2) General	\$	\$	\$
c. Interest	\$	\$	\$
d. Costs (see reverse)	\$	\$	\$
e. Attorney fees	\$	\$	\$
f. TOTALS	\$ <u>Personal property</u>	\$	\$

g. **Daily damages** were demanded in complaint at the rate of: \$ _____ per day beginning (date): _____
 (* Personal injury or wrongful death actions; Code Civ. Proc., § 425.11.)

3. (Check if filed in an unlawful detainer case) Legal document assistant or unlawful detainer assistant information is on the reverse (complete item 4).

Date: January 19, 2006

 Scott A. Edelman
 (TYPE OR PRINT NAME)

▶ 
 (SIGNATURE OF PLAINTIFF OR ATTORNEY FOR PLAINTIFF)

FOR COURT USE ONLY	(1) <input type="checkbox"/> Default entered as requested on (date): (2) <input type="checkbox"/> Default NOT entered as requested (state reason):	Clerk, by _____, Deputy
---------------------------	---	-------------------------

PLAINTIFF/PETITIONER: Leonard Norman Cohen	CASE NUMBER:
DEFENDANT/RESPONDENT: Kelley A. Lynch	BC 341120

4. **Legal document assistant or unlawful detainer assistant (Bus. & Prof. Code, § 6400 et seq.).** A legal document assistant or unlawful detainer assistant did did not for compensation give advice or assistance with this form. (If declarant has received any help or advice for pay from a legal document assistant or unlawful detainer assistant, state):
- | | |
|--|----------------------------|
| a. Assistant's name: | c. Telephone no.: |
| b. Street address, city, and zip code: | d. County of registration: |
| | e. Registration no.: |
| | f. Expires on (date): |

5. **Declaration under Code of Civil Procedure Section 585.5** (required for entry of default under Code Civ. Proc., § 585(a)). This action
- a. is is not on a contract or installment sale for goods or services subject to Civ. Code, § 1801 et seq. (Unruh Act).
- b. is is not on a conditional sales contract subject to Civ. Code, § 2981 et seq. (Rees-Levering Motor Vehicle Sales and Finance Act).
- c. is is not on an obligation for goods, services, loans, or extensions of credit subject to Code Civ. Proc., § 395(b).
6. **Declaration of mailing (Code Civ. Proc., § 587).** A copy of this Request for Entry of Default was
- a. not mailed to the following defendants, whose addresses are unknown to plaintiff or plaintiff's attorney (names):
- b. mailed first-class, postage prepaid, in a sealed envelope addressed to each defendant's attorney of record or, if none, to each defendant's last known address as follows:
- (1) Mailed on (date):
- (2) To (specify names and addresses shown on the envelopes):

I declare under penalty of perjury under the laws of the State of California that the foregoing items 4, 5, and 6 are true and correct.
 Date: January 19, 2006

Scott A. Edelman	
(TYPE OR PRINT NAME)	(SIGNATURE OF DECLARANT)

7. **Memorandum of costs** (required if money judgment requested). Costs and disbursements are as follows (Code Civ. Proc., § 1033.5):
- | | |
|--------------------------------|----------|
| a. Clerk's filing fees | \$ |
| b. Process server's fees | \$ |
| c. Other (specify): | \$ |
| d. | \$ |
| e. TOTAL | \$ _____ |
- f. Costs and disbursements are waived.
9. I am the attorney, agent, or party who claims these costs. To the best of my knowledge and belief this memorandum of costs is correct and these costs were necessarily incurred in this case.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
 Date: January 19, 2006

Scott A. Edelman	
(TYPE OR PRINT NAME)	(SIGNATURE OF DECLARANT)

8. **Declaration of nonmilitary status** (required for a judgment). No defendant named in item 1c of the application is in the military service so as to be entitled to the benefits of the Servicemembers Civil Relief Act (50 U.S.C. App. § 501 et seq.).

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
 Date: January 19, 2006

Scott A. Edelman	
(TYPE OR PRINT NAME)	(SIGNATURE OF DECLARANT)

CALIFORNIA STATE COURT

CERTIFICATE OF SERVICE

I, Barbara Siddell, certify as follows:

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REQUEST FOR COURT JUDGMENT

on the parties stated below, by placing a true copy thereof in an envelope addressed as shown below by the following means of service:

Robert H. Hishon, Esq.
The Hishon Firm, LLC
1201 Peachtree Street, N.E., Suite 1000
Atlanta, Georgia 30361

(404) 817-7791 Telephone
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(310) 215-7529 Telephone
(877) 349-9860 Fax
eMail: lucasn@hbblaw.com

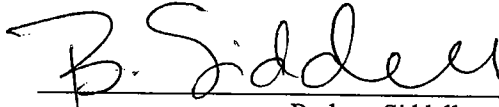
Kelley Lynch
2648 Mandeville Canyon Road
Los Angeles, CA 90049

(310) 254-5775 Telephone

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- SERVICE BY MAIL – DEPOSITING IN A U.S. POSTAL SERVICE MAIL BOX:** By depositing true copies thereof enclosed in sealed envelopes addressed to the parties in the within action with postage thereon fully prepaid in a United States Postal Service mail box at Los Angeles, California, addressed as follows
- BY PERSONAL SERVICE:** I placed a true copy in a sealed envelope addressed to each person[s] named at the address[es] shown and giving same to a messenger for personal delivery before 5:00 p.m. on the above-mentioned date.
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- I am employed by a member of the bar of this court, and the foregoing document(s) was(were) printed on recycled paper.
- (STATE) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 19, 2006.



Barbara Siddell

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8 Attorneys for Plaintiff
9 LEONARD NORMAN COHEN

10 SUPERIOR COURT, STATE OF CALIFORNIA
11 COUNTY OF LOS ANGELES

12 LEONARD NORMAN COHEN, an
13 individual,

14 Plaintiff,

15 v.

16 KELLEY A. LYNCH,

17 Defendant.

Case No. BC 341120

Hon. Kenneth R. Freeman, Dept. 64

**[PROPOSED] JUDGMENT BY COURT
AFTER DEFAULT**

DATE OF FILING
OF COMPLAINT: October 11, 2005

TRIAL DATE: None

18
19 The defendant Kelly A. Lynch ("Lynch") having been served with process, having failed to
20 appear and answer the plaintiff's complaint filed herein, and the default of said defendant Lynch
21 having been duly entered, upon application of plaintiff Leonard Norman Cohen ("Cohen"), and
22 evidence having been considered by the Court:

23 It is therefore **ORDERED, ADJUDGED AND DECREED** that judgment therefore be
24 entered in favor of Cohen as rightful owner of the contents of the boxes seized on October 18, 2005
25 and October 24, 2005 by the Los Angeles County Sheriff's Department from Lynch's home located at
26 2648 Mandeville Canyon Road, Los Angeles, California 90049, pursuant to an *ex parte* writ of
27 possession issued by Commissioner Greenberg in Department 66 of this Court on October 13, 2005.

28 ///

1 The Los Angeles County Sheriff's inventory list is attached to this Judgment as Exhibit A and is
2 incorporated herein. The Clerk is ordered to enter the judgment.

3 DATED:
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Honorable Kenneth R. Freeman
Superior Court Judge

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LOS ANGELES COUNTY SHERIFF'S DEPARTMENT
INVENTORY

COTTEN

PLAINTIFF

LYNETT

DEFENDANT

CASE No. BC341120
By M. VERZOLA #445580
KEEPER

ITEM	QUANTITY	UNIT	DESCRIPTION
1.	8	1	① "Reel → "Tell Me Everything" ADAM COTTEN
2.	}	1	② "Reel → "Tell Me Everything" ADAM COTTEN
3.		1	③ ELTON JOHN → "I'm Your Man" - HOW SLAVE @ ④
4.		1	④ "I'm Your Man" → Reel → Leonard Cohn
5.		1	⑤ ADAM COTTEN REEL → TAPE # 467 (MIX THIS)
6.		1	⑥ "CRY OPHELA" → ADAM COTTEN / STAYE LINDSEY REEL
7.		1	⑦ REEL → ELTON JOHN "I'm Your Man" REEL #3
8.		1	⑧ REEL → "AINT NO CURE FOR LOVE → LEONARD COTTEN TAPE
9.		1	2
10.	1	3	BOX OF RECORDS "LEONARD COTTEN" PROMOTIONAL USE ONLY
11.	1	4	PACKAGE MUSC. FILES - LEONARD COTTEN
12.	1	5	BOX MUSC. PAPERS / ENVELOPES
13.	1	6	BOX MUSC VIDEOS
14.	1	7	BOX MUSC. FILES - LEONARD COTTEN
15.	1	8	PACKAGE - ORIGINAL MANUSCRIPTS - LEONARD COTTEN
16.	1	9	BOX - MUSC / DAMAGED DOCUMENTS - LEONARD COTTEN
17.	1	10	BOX - MUSC BOOKS - LEONARD COTTEN
18.	1	11	BOX - MUSC DAMAGED DOCUMENTS - LEONARD COTTEN
19.	1	12	BOX - MUSC DAMAGED DOCUMENTS - LEONARD COTTEN
20.	1	13	BOX - MUSC STRANGER MUSC DOCUMENTS - LEONARD COTTEN
21.	1	14	BOX - MUSC DOCUMENTS / PHOTO PAPER
22.	1	15	BOX - NO TOP - MUSC. DOCUMENTS / 2 BOOKS - "TOWER OF SONGS, THE SONGS OF LEONARD COTTEN BOX"
23.			
24.	1	16	BOX - MUSC. DOCUMENTS - LEONARD COTTEN
25.	1	17	BOX - MUSC BOOKS / DAMAGED

10/24/2005
DATE

[Signature] #445580
DEPUTY KEEPER - SIGNATURE

REMOVED BY x Kyle Duwall 10-24-05

LOS ANGELES COUNTY SHERIFF'S DEPARTMENT
INVENTORY

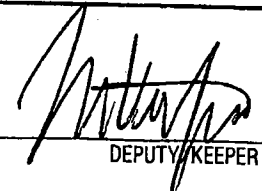
COTTON
PLAINTIFF

LYNCH
DEFENDANT

CASE No. BG341120
M. VORZOLA #445580
KEEPER

ITEM	QUANTITY	UNIT	DESCRIPTION
1.	1	18	BOX - MISC. BOOKS - LEONARD COTTON
2.	1	19	BOX - DAMAGED / MISC. BOOKS, PAPERS, PINS
3.	1	20	BOX - NO TOP / MISC. DOCUMENTS, 3 PROCAN AWARDS, ^{LEONARD COTTON}
4.	1	21	BOX - NO TOP / MISC. DOCUMENTS, ETC.
5.	1	22	BOX - NO TOP / MISC. DOCUMENTS
6.	1	23	PACKAGE - MISC. DOCUMENTS / ITEMS
7.	1	24	PACKAGE - MISC. DOCUMENTS
8.	1	25	BOX - MISC. DOCUMENTS - DAMAGED
9.	1	26	BOX - MISC. DOCUMENTS / BINDERS
10.	1	27	BOX - MISC. DOCUMENTS / BLUE MUST - LEONARD COTTON
11.	1	28	BOX - NO TOP - MISC. DOCUMENTS / RECORDS
12.	1	29	BOX - MISC. DOCUMENTS TAPES
13.	1	30	BOX - NO TOP - MISC. PAPERS, 3 "JUNO" AWARDS, MISC TAPES
14.	1	31 AM	
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10/24/2005
DATE

 #445580
DEPUTY/KEEPER - SIGNATURE

LOS ANGELES COUNTY SHERIFF'S DEPARTMENT
INVENTORY

COHEN

PLAINTIFF

LYNCH

DEFENDANT

CASE No. BC341120

Sgt. JOHN FERNANDEZ 263097
B-1 MATTHEW VERZOLA ^{KEEPER} 445580

EM	QUANTITY	UNIT	DESCRIPTION / CONTENTS
1.	1	#1 BOX	"BLUE MIST TOURING, INC" MISC. LEGAL PAPERS
2.	1	#2 BOX	PERSONAL/BUSINESS ITEMS, PAPERWORK
3.	1	#3 BOX	PERSONAL/BUSINESS ITEMS/PAPERWORK INCLUDING A
4.			9x13 MANILA ENVELOPE ADDRESSED TO LEONARD COHEN
5.	1	#4 BOX	LABELLED "STRANGER MIGHT" CONTAINING ITEMS
6.			BELONGING TO LEONARD COHEN
7.	1	#5 BOX	CONTENTS: GOLD STAR RECORDING - REEL TAPE "HEARTON"
8.			RED 6"x8" BOX CONTAINING PASSPORT, MEMO
9.			PAD, WATCHES, CORRESPONDENCE BELONGING
0.			TO LEONARD COHEN
1.	1	#6 BOX	MISC. BUSINESS/PERSONAL ITEMS
2.	1	#7 BOX	DOCUMENTS: "LEONARD COHEN HOLDINGS"
3.			"SABBATH DAY TRUST"
4.			"TRADITIONAL HOLDINGS, LLC"
5.	1	#8 BOX	MISC. BUSINESS/PERSONAL ITEMS/DOCUMENTS
6.			TAX RETURNS
7.	1	#9 BOX	MISC. BUSINESS/PERSONAL ITEMS
8.			"LEONARD COHEN PRODUCTIONS, LTD"
9.			
20.			
21.		NOTE:	ALL BOXES ARE STANDARD CARDBOARD FOLD-DOWN TYPE
22.			WITH LIDS - LABELLED AT TIME OF SEIZURE AS NUMBERED
23.			BOX WITH CASE NUMBER AND SEIZURE DATE.
24.			
25.			CONTENTS OF ALL BOXES HAVE NAME OF LEONARD COHEN OR HAVE LEONARD COHEN AS PARTNER.

10-18-05

DATE

[Signature] 263097
DEPUTY SHERIFF - SIGNATURE

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**CALIFORNIA STATE COURT
CERTIFICATE OF SERVICE**

I, Barbara Siddell, certify as follows:

I am employed in the County of Los Angeles, State of California; I am over the age of eighteen years and am not a party to this action; my business address is 333 South Grand Avenue, Los Angeles, California 90071-3197, in said County and State. On January 19, 2006, I served the following document(s):

[PROPOSED] JUDGMENT BY COURT AFTER DEFAULT

on the parties stated below, by placing a true copy thereof in an envelope addressed as shown below by the following means of service:

Robert H. Hishon, Esq. The Hishon Firm, LLC 1201 Peachtree Street, N.E., Suite 1000 Atlanta, Georgia 30361	(404) 817-7791 Telephone (404) 817-2486 Fax
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Nancy E. Lucas, Esq. Haight, Brown & Bonesteel, LLP 6080 Center Drive, Suite 800 Los Angeles, CA 90045	(310) 215-7529 Telephone (877) 349-9860 Fax eMail: lucasn@hbblaw.com
---	---

Kelley Lynch 2648 Mandeville Canyon Road Los Angeles, CA 90049	(310) 254-5775 Telephone
--	--------------------------

SERVICE BY MAIL: I placed a true copy in a sealed envelope addressed as indicated above, on the above-mentioned date. I am familiar with the firm's practice of collection and processing correspondence for mailing. It is deposited with the U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

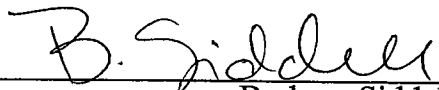
SERVICE BY MAIL – DEPOSITING IN A U.S. POSTAL SERVICE MAIL BOX: By depositing true copies thereof enclosed in sealed envelopes addressed to the parties in the within action with postage thereon fully prepaid in a United States Postal Service mail box at Los Angeles, California, addressed as follows

BY PERSONAL SERVICE: I placed a true copy in a sealed envelope addressed to each person[s] named at the address[es] shown and giving same to a messenger for personal delivery before 5:00 p.m. on the above-mentioned date.

BY FACSIMILE: I caused each such document to be transmitted by facsimile machine, to the parties and numbers indicated above. The facsimile machine I used complied with Rule 2003(3).

- 1 **BY UPS NEXT DAY AIR:** On the above-mentioned date, I placed a true copy of the
2 above mentioned document(s), together with an unsigned copy of this declaration, in a
3 sealed envelope or package designated by the United Parcel Service with delivery fees
4 paid or provided for, addressed to the person(s) as indicated above and deposited same in
5 a box or other facility regularly maintained by United Parcel Service or delivered same to
6 an authorized courier or driver authorized by United Parcel Service to receive documents.
- 7 I am employed by a member of the bar of this court, and the foregoing document(s)
8 was(were) printed on recycled paper.
- 9 **(STATE)** I declare under penalty of perjury under the laws of the State of California
10 that the foregoing is true and correct.

11 Executed on January 19, 2006.

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Barbara Siddell