

**LAW OFFICES OF STEFFENY HOLTZ**

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*Counsel for Defendants The Broadus Collection, LLC;  
Casa Verde Capital, LLC; Merry Jane Events, Inc.;  
and Snoop Dogg's LLC (the "Entity Defendants")*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

JANE DOE, an Individual Woman,

Plaintiff,

v.

CALVIN BROADUS AKA "SNOOP  
DOGG", individually; DONALD  
CAMPBELL AKA "BISHOP DON  
MAGIC JUAN", individually; SNOOP  
DOGG'S, LLC; THE BROADUS  
COLLECTION, LLC; CASA VERDE  
CAPITAL, LLC; and MERRY JANE  
EVENTS, INC.,

Defendants.

Case No. 2:22-cv-00900-GW-AS

**DECLARATION OF STEFFENY  
HOLTZ IN SUPPORT OF ENTITY  
DEFENDANTS' MOTION TO  
DISMISS PLAINTIFF'S FIRST  
AMENDED COMPLAINT**

**[Fed. R. Civ. P. 12(b)(6)]**

The Hon. George H. Wu

Hearing Date: April 21, 2022

Time: 8:30 a.m.

1 I, Steffeny Holtz, declare as follows:

2 1. I am an attorney duly admitted to practice in the State of California  
3 and this Court. I am an attorney at the Law Offices of Steffeny Holtz, and am  
4 counsel of record in this action for Defendants The Broadus Collection, LLC; Casa  
5 Verde Capital, LLC; Merry Jane Events, Inc.; and Snoop Dogg's LLC  
6 (collectively, the "Entity Defendants"). I have personal knowledge of the  
7 information stated below and could testify to it under oath.

8 2. Attached as Exhibit 1 is a true and correct copy of the Articles of  
9 Organization for Defendant The Broadus Collection LLC, with a stamp reflecting  
10 it was filed with the California Secretary of State on March 23, 2020. Exhibit 1 is  
11 available on the California Secretary of State's website.

12 3. Attached as Exhibit 2 is a true and correct copy of the Articles of  
13 Incorporation for Defendant Merry Jane Events, Inc., with a stamp reflecting it was  
14 filed with the California Secretary of State on September 26, 2018. Exhibit 2 is  
15 available on the California Secretary of State's website.

16 4. Attached as Exhibit 3 is a true and correct copy of the Application to  
17 Register a Foreign Limited Liability Company for Defendant Casa Verde Capital,  
18 LLC, with a stamp reflecting it was filed on May 1, 2015. Exhibit 3 is available on  
19 the California Secretary of State's website, and it states that this Defendant was  
20 formed as a Delaware limited liability company on November 24, 2014.

21 5. Attached as Exhibit 4 is a true and correct copy of the Articles of  
22 Organization for Defendant Snoop Dogg's LLC, with a stamp reflecting it was  
23 filed on January 24, 2020. Exhibit 4 is available on the California Secretary of  
24 State's website. Attached as Exhibit 5 is a true and correct copy of the  
25 Amendment to Articles of Organization for Defendant Snoop Dogg's LLC, with a  
26 stamp reflecting it was filed on January 29, 2020. Exhibit 5 is available on the  
27 California Secretary of State's website. Exhibit 4 reflects that this Defendant was  
28 named "Snoopy's Clothing LLC" for less than one week before being renamed  
"Snoop Dogg's LLC" on January 29, 2020, as reflected in Exhibit 5.



**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am over the age of 18 and not a party to the within action. My business address is 222 N. Pacific Coast Highway, Suite 2000, El Segundo, California 90245. On March 24, 2022, I served the foregoing document described as

**DECLARATION OF STEFFENY HOLTZ IN SUPPORT OF ENTITY  
DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S**

**FIRST AMENDED COMPLAINT**

on the following-listed attorneys who are not on the list to receive e-mail notices for this case (who therefore require manual notice) by the following means of service:

**SERVED BY U.S. MAIL:** There are currently no individuals on the list to receive mail notices for this case.

**SERVED BY CM/ECF:** I certify that, on March 24, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system. The filing of the foregoing document will send copies to the following CM/ECF participants:

The following are those who are currently on the list to receive e-mail notices for this case.

Matt Evan Orellana Finkelberg  
matt@dereksmithlaw.com

Jesse Asher Gessin  
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Jennifer L. Keller  
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Jeremy W. Stamelman  
jstamelman@kelleranderle.com

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on March 24, 2022, at El Segundo, California.

/s/ Steffeny Holtz  
Steffeny Holtz