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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
11 **FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

12 WILLIAM B. PITT, an individual, and  
13 MONDO BONGO, LLC, a California  
limited liability company,

14 Plaintiffs,

15 vs.

16 ANGELINA JOLIE, an individual, and  
17 NOUVEL, LLC, a California limited  
liability company,

18 Defendants.

CASE NO. 22STCV06081

*[Hon. Cindy Pánuco]*

**ANGELINA JOLIE'S BRIEF IN  
RESPONSE TO COURT'S ORDER RE:  
ALTERNATIVE WRIT OF MANDATE**

19 AND RELATED CROSS ACTIONS.  
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ANGELINA JOLIE'S BRIEF IRT COURT'S ORDER RE ALTERNATIVE WRIT OF MANDATE

1 **I. INTRODUCTION**

2 The Court need not look far for guidance regarding the 22 documents at issue, which  
3 defendant and cross-complainant Angelina Jolie asserts are protected by the attorney-client  
4 privilege. The Court of Appeal has already reviewed this Court’s record—and the parties’  
5 nearly 30,000 words of fresh briefing to the Court of Appeal—and directed this Court either to  
6 enter an “order finding that Jolie has met her initial burden of establishing facts necessary to  
7 support a prima facie claim of attorney-client privilege,” or show cause why the Court of  
8 Appeal should not order this Court to make that ruling. (Order & Alt. Writ of Mandate (Feb.  
9 25, 2026) (Alt. Writ), at 1.) The implication of that choice is clear: The Court of Appeal has  
10 preliminarily concluded that, based on the uncontroverted evidence Jolie submitted to oppose  
11 Pitt’s motion, the documents are presumptively privileged. This Court should use the  
12 Alternative Writ as a guidepost and enter a new order (a) finding that Jolie has met her burden  
13 of showing the privilege applies, and (b) denying in full plaintiff and cross-defendant William  
14 B. Pitt’s motion to compel compliance.

15 **II. ARGUMENT**

16 **A. Jolie Has Established A Prima Facie Case That The Documents Are Privileged.**

17 The holder of the attorney-client privilege bears the initial burden of asserting it and  
18 showing that it applies. But the burden is light. The holder of the privilege need only  
19 “establish[] the preliminary facts necessary to support its exercise, i.e., a communication made  
20 *in the course of* an attorney-client relationship.” *Costco Wholesale Corp. v. Superior Court*, 47  
21 Cal.4th 725, 733 (2009) (emphasis added).

22 On December 17, 2025, this Court granted Pitt’s motion to compel production,  
23 concluding that Jolie had not met that burden. The Court of Appeal clearly disagrees. On  
24 February 25, following Jolie’s writ petition, the Court of Appeal issued an Alternative Writ of  
25 Mandate ordering this Court either to “find[] that Jolie has met her initial burden” under *Costco*  
26 or show cause why the Court of Appeal should not order this Court to make that ruling. (Alt.  
27 Writ, at 1.) The Court of Appeal’s order implicitly adopts the reasoning of Jolie’s petition:  
28

- 1 • The attorney-client privilege extends to all the persons involved in these 22  
2 communications because they are Jolie’s authorized representatives and agents  
3 for communication, and her attorneys’ expert consultants (*see* Evid. Code,  
4 §§ 951–952; *Zurich American Ins. Co. v. Superior Court*, 155 Cal.App.4th  
5 1485, 1498–1502 (2007); *DeLuca v. State Fish Co., Inc.*, 217 Cal.App.4th 671,  
6 688 (2013));
- 7 • The attorney-client privilege extends to the substance of these communications  
8 because they consist of confidential discussions of Jolie’s attorneys’ advice  
9 and requests for further advice (*see Zurich*, 155 Cal.App.4th at 1502; *City &*  
10 *County of San Francisco v. Superior Court*, 37 Cal.2d 227, 234–237 (1951));  
11 and
- 12 • To hold that the privilege does *not* apply to these communications would make  
13 it impossible for the client to rely on trusted, authorized advisors and agents to  
14 further the purposes of the attorney-client relationship, and thus would  
15 undermine the very purpose of the privilege.

16 The Court of Appeal’s order also implicitly rejected the reasoning of Pitt’s preliminary  
17 opposition—the chief tactics of which were to draw a specious distinction between  
18 communications “discussing” versus “reflecting” legal advice, and to express doubt and denial,  
19 unsupported by any evidence, about Jolie’s and her attorney’s sworn and un rebutted  
20 declarations.

21 This Court should enter the finding requested by the Court of Appeal that Jolie has met  
22 her burden of establishing a prima facie case that the privilege applies and deny Pitt’s motion.

23 **B. As Pitt Is Not Asserting Waiver, Pitt Has No Other Basis To Support His Motion.**

24 Pitt expressly disclaimed any argument that Jolie had waived the attorney-client  
25 privilege: The sole ground of Pitt’s motion to compel compliance was his argument that Jolie  
26 failed to make a prima facie case for the attorney-client privilege. (Pitt Reply ISO Mot. (Oct.  
27 27, 2025), at 7, fn. 3.) The Court of Appeal has now rejected that ground. No basis remains to  
28 uphold the grant of Pitt’s motion.

1 This Court should therefore comply with the Court of Appeal’s alternative (a) by  
2 vacating the December 17, 2025 order granting Pitt’s motion, and entering a new and different  
3 order denying Pitt’s motion, on the grounds that Jolie has met her initial burden under *Costco*,  
4 and that Pitt’s motion presents no other basis for overcoming the privilege.

5 Before making that order, this Court must first conduct a hearing. *See Brown, Winfield*  
6 *& Canzoneri, Inc.* (2010) 47 Cal.4th 1233, 1250. While Jolie interprets the Court of Appeal’s  
7 order as requiring that the hearing itself be held, and any subsequent order issued, by March 27,  
8 2026 (Alt. Writ, at 1–2), Jolie understands that the Court interprets the order as only having to  
9 select the first option in the Alternative Writ by that date, and, for this reason, has provisionally  
10 set the required hearing for April 17. As the Alternative Writ requires Jolie to inform the Court  
11 of Appeal “on or before March 27, 2026, whether the respondent has complied with alternative  
12 (a),” Jolie will inform the Court of Appeal of this Court’s March 4 order and related schedule.

13 **III. CONCLUSION**

14 The Court should adopt as final the tentative ruling reflected in its March 4, 2026 order and  
15 comply with option (a) of the Alternative Writ in full, conduct the *Brown, Winfield* hearing,  
16 vacate its December 17, 2025 order, and enter a new and different order denying Pitt’s motion.

17  
18 DATED: March 11, 2026

MURPHY ROSEN LLP

19 By:   
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**PROOF OF SERVICE**

I, **Leslie Maytorena**, declare:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to this action. My business address is 100 Wilshire Boulevard, Suite 1300, Santa Monica, California 90401-1142, (310) 899-3300.

On **March 11, 2026**, I served the document(s) described as **ANGELINA JOLIE’S BRIEF IN RESPONSE TO COURT’S ORDER RE: ALTERNATIVE WRIT OF MANDATE** on the interested parties in this action:

**SEE ATTACHED SERVICE LIST**

**BY ELECTRONIC SERVICE:** I caused the above-document(s) to be served via the Los Angeles Superior Court’s electronic service provider, One Legal.

[State] I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on **March 11, 2026**, at Santa Monica, California



**Leslie Maytorena**

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