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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT

WILLIAM B. PITT, an individual; and MONDO BONGO, LLC, a California limited liability company, Plaintiffs, vs. ANGELINA JOLIE, et al., Defendants.	CASE NO. 22STCV06081 **PLAINTIFFS' IDC STATEMENT REGARDING REQUESTS FOR PRODUCTION NOS. 81 & 82** Judge: Hon. Cindy Pánuco Dept.: 224 Hearing Date: July 8, 2026 Time: 10:00 a.m. Reservation ID: 533416475966
AND RELATED CROSS-ACTIONS	Action Filed: February 17, 2022 Trial Date: August 4, 2027

I. Background

Plaintiffs William B. Pitt and Mondo Bongo and Defendant Angelina Jolie agreed to present at the upcoming Informal Discovery Conference a dispute concerning Plaintiffs' Requests for Production Nos. 81 and 82:

> **<u>Request No. 81:</u>** DOCUMENTS sufficient to show the amount of income earned or received by YOU from January 1, 2017 to December 31, 2021, by year and by source, including but not limited to monies received from self-employment.
>
> **<u>Request No. 82:</u>** DOCUMENTS sufficient to show ANY profit participation statement YOU received from January 1, 2017 through December 31, 2021 for which YOU received ANY payment.

The dispute is narrow: Jolie has agreed to produce responsive documents for 2020 and 2021, but she refuses to produce responsive documents for 2017 through 2019. There is no principled basis for limiting Jolie's production to 2020–21. Jolie has affirmatively placed her financial condition for the entire period at issue by alleging that Pitt exerted economic pressure over her after the parties' 2016 separation and that, by 2021, she had no meaningful choice but to sell her interests in Château Miraval to the Stoli Parties.

Regardless of whether her allegations state a legally cognizable defense—a question that can be left for another day—Plaintiffs are entitled to test the veracity of her claim that she sold her interests in Château Miraval without Pitt's consent under economic pressure she allegedly faced since 2016, beginning after the parties' separation and continuing through the 2021 Transaction at the center of this case. Plaintiffs respectfully request that the Court direct Jolie to produce documents sufficient to show her annual income and profit-participation payments for the full 2017–2021 period.

A. Jolie's allegations put her financial condition directly at issue for the entire period.

Jolie has made her alleged financial vulnerability central to her case. In her pleadings, she alleges that after the parties separated in 2016, Pitt's financial decision-making—including reinvesting winery profits into the business and home renovations—

gave him "substantial leverage and control over Jolie." Jolie Cross-Compl. ¶ 25. She further alleges that by 2019, she was "seeking financial independence" and had "concluded that she needed to sell her interest in Chateau Miraval" to achieve it. *Id.* ¶ 26. She alleges that Château Miraval was her "most important asset," that she sought to sell her interest to achieve "financial independence" from Pitt, and that Pitt tried to condition her "economic freedom and security" on his proposed NDA. Jolie Cross-Compl. ¶¶ 25, 26, 31, 36.

Jolie has repeated this theme in motion practice, claiming that Pitt took "advantage of [her] position" by conditioning the Miraval transaction on a "controlling and punishing NDA" that "nearly broke her." Jolie Mot. to Compel (filed April 4, 2024) at 6. And she has also claimed that Pitt left her financially cornered after negotiations stalled between them, such that "she had no other option but to sell to someone else." *Id*. at 19; *see also* Jolie Reply ISO Mot. to Compel (filed July 25, 2024) at 4–6 (claiming that Pitt's conduct deprived Jolie of reasonable economic alternatives and framing the NDA demand as coercive pressure tied to her purported financial condition).

In short, Jolie has repeatedly placed at issue the financial distress and susceptibility to economic pressure she allegedly faced following her separation from Pitt in 2016. Yet there is substantial reason to doubt this allegation.[1] Jolie was, during the relevant period, one of Hollywood's most prominent and highly compensated actresses, with income streams from major studio projects and profit-participation rights. Indeed, during and around the relevant period, Jolie starred in, committed to star in, or received compensation from major commercial films, including Disney's *Maleficent* franchise and Marvel's *Eternals*. Jolie's *Maleficent* films grossed well over $1 billion worldwide, and *Eternals* grossed approximately $402.1 million worldwide. Plaintiffs are entitled to test whether Jolie's claimed economic vulnerability is consistent with her actual income and profit-participation payments.

[1] Directly contrary to these assertions of "economic coercion," Pitt gave Jolie an $8 million loan to help fund her purchase of a new California home following their separation in 2016. Plaintiffs' Third Amended Complaint ¶ 61.

B. Meet-and-Confer Background

On December 10, 2024, Plaintiffs served Requests for Production (Set Three). The parties met and conferred extensively about these requests and resolved most issues. The remaining dispute concerns a narrow category of documents sufficient to test Jolie's claim that she was financially vulnerable during the period between the parties' 2016 separation and Jolie's 2021 sale of her interests in Miraval to Stoli.

On Thursday, February 19, 2026, Plaintiffs advised Jolie's counsel that they intended to move to compel on the disputed requests. Later that day, Jolie's counsel requested that Plaintiffs hold off filing their motion. Although Plaintiffs expressed the need to move promptly because the first available hearing date was just three months before the then-current February 2027 trial date, they agreed to hold back the filing after Jolie represented that she would provide declarations responsive to Request Nos. 81 and 82 and would determine what specific documents she could produce in support thereof. Jolie then represented in a phone call that she would produce all participation statements responsive to Request No. 82—*i.e.* statements from 2017 through 2021—and confirmed that she would continue to evaluate her document production with respect to Request No. 81.

Plaintiffs relied on Jolie's representations. But the following Monday, February 23, after Plaintiffs had refrained from filing the motion, Jolie reversed course. She withdrew her agreement to provide declarations responsive to Request Nos. 81 and 82 for the entire period, withdrew her agreement to produce participation statements for the entire period, and instead served supplemental responses limiting Jolie's production to 2020 and 2021 only, omitting responsive documents for 2017, 2018 and 2019.

To avoid motion practice, Plaintiffs offered a practical alternative: Jolie could stipulate that she was not under economic pressure before January 1, 2020, and that Plaintiffs did not exert economic coercion on her from 2017–19. With that stipulation, Plaintiffs could agree to withdraw their disputed Requests for the 2017–19 time period. Jolie declined to stipulate. This IDC follows.

II. Summary of Argument

A. Documents from 2017 to 2019 are directly relevant.

Jolie cannot claim that Pitt economically cornered one of Hollywood's most successful actresses while refusing to produce the basic income and profit-participation documents needed to test that claim. Her theory is that Pitt's proposed NDA was "economically abusive" and "coercively controlling." Jolie Mot. to Compel at 16. But if Jolie had substantial income and other resources during the relevant period, evidence thereof would directly undermine her claim that Pitt left her with no meaningful alternative but to sell her interests in their shared property to Stoli. It would also support Plaintiffs' theory that Jolie unjustly benefited from Pitt's disproportionate investment in Miraval, which she justified by claiming she could not afford to keep up with his contributions.

Jolie's public profile and film work make the requested discovery especially probative of her financial position—she is a globally recognized actress who had commanded extraordinary compensation for major studio work, including reported compensation of approximately $33 million for *Maleficent*, which made her Forbes' highest-paid actress for that year.

Given Jolie's own allegations that she lacked meaningful economic alternatives, Plaintiffs are entitled to documents sufficient to show what she actually earned from acting income, self-employment income, and profit-participation payments during 2017–2021.

Request No. 81 seeks documents sufficient to show Jolie's earned income during the period between her separation from Pitt and the 2021 Transaction. Request No. 82 seeks documents sufficient to show Jolie's profit participation payments from the same period. As a major studio actress with roles in commercially significant films, Jolie may have received backend or participation income that would not be apparent from salary information alone. Both requests go to the same core issue: whether Jolie's claimed financial vulnerability is consistent with her actual financial condition.

B. Plaintiffs need the 2017-19 documents to test Jolie's narrative.

Jolie's allegations do not begin in 2020. As noted, she alleges that after the parties separated in 2016, Pitt's financial decision-making—including reinvesting winery profits into the business and home renovations—gave him "substantial leverage and control over Jolie." Jolie Cross-Compl. ¶ 25. She further alleges that by 2019, she was "seeking financial independence" and had "concluded that she needed to sell her interest in Chateau Miraval" to achieve it. *Id.* ¶ 26.

Thus, discovery limited to 2020 and 2021 would give Plaintiffs only the final chapter of Jolie's financial narrative. It would exclude the very period when Jolie claims the alleged economic pressure began and when she says she reached the decision to sell.

Even if Jolie's theory were limited to 2020 and 2021, Plaintiffs would still be entitled to documents from 2017 to 2019 to compare Jolie's financial condition before and during the alleged pressure campaign. Without that baseline, Plaintiffs cannot meaningfully test whether Jolie's claimed financial vulnerability was real, overstated, or inconsistent with her actual income and liquid assets.

C. Jolie's privacy objections do not justify withholding the documents.

Jolie has raised privacy objections as to the 2017–19 period; they do not defeat this discovery. California law recognizes that financial privacy interests may yield where a party places the information directly at issue, such that disclosure is "essential to the fair resolution of the lawsuit." *Britt* v. *Superior Ct.*, 20 Cal. 3d 844, 858-9 (1978); *see also Look* v. *Penovatz*, 34 Cal. App. 5th 61, 73 (2019) (applying *Britt* to financial discovery); *Vinson* v. *Superior Ct.*, 43 Cal. 3d 833, 842 (1987) (applying Britt to constitutional informational privacy); *GT, Inc.* v. *Superior Ct.*, 151 Cal. App. 3d 748, 753 (1984) (noting that because the petitioner "himself put in issue his financial worth, he thereby waived his constitutional right of privacy…").

That is exactly what happened here. Jolie has made her financial condition central to her cross-claim and defense. She cannot now use her alleged financial vulnerability as a sword while simultaneously invoking privacy interests as a shield against scrutiny. Under established California law, Plaintiffs are entitled to “put [her] truth to the test.” *Vinson*, 43 Cal. 3d at 842.

Nor does the ordinary privacy balancing analysis bar production. Under *Hill* v. *Nat’l Collegiate Athletic Assn.*, 7 Cal. 4th 1, 35–37 (1994), as incorporated in *Williams* v. *Super. Ct.*, 3 Cal. 5th 531, 552 (2017), a party asserting privacy objections must first establish a legally protected privacy interest, a reasonable expectation of privacy, and a serious threatened invasion of that interest. *Hill*, 7 Cal. 4th at 35–37. Only if that threshold showing is made does the Court balance the asserted privacy interest against the countervailing interests favoring disclosure, while considering whether protective measures can mitigate any intrusion. *Id.* at 37–40; *Williams*, 3 Cal. 5th at 552.

Jolie cannot making that showing here. Among other reasons, the requested information was already subject to disclosure in the parties’ divorce proceedings, which spanned the 2017–19 period at issue. In addition, Jolie has already produced tax returns for 2020 and 2021, and further directed Plaintiffs to review Jolie’s tax returns for 2022 as part of the meet-and-confer process. That conduct substantially undercuts any claim that producing comparable information for 2017–19 would be a serious privacy invasion.

In any event, any residual privacy concerns can be addressed through the existing Protective Order, which Jolie herself has previously recognized as adequate protection for sensitive information. *See* Jolie’s Reply ISO Mot. to Compel at 11; Ruling on Jolie’s Mot. to Compel (Nov. 25, 2024) at 5.

D. Documents from 2017-19 are not burdensome to produce.

Production of the requested documents dating back to 2017 would not impose any meaningful burden on Jolie, as the Requests seek records that are almost certainly maintained alongside the 2020–21 documents she has already collected and produced, and therefore do not require a new or expansive search.

As to Request No. 81, Jolie’s year-by-year income is reflected in routine financial records, including tax returns. Extending that same production to the adjacent years (2017–2019) would not require any materially different or burdensome effort. And, if Jolie would prefer to produce less sensitive documents for the years 2017–19, she has already offered (and then revoked that offer) to undertake efforts to prepare a declaration of income as to those years *in addition to* supporting documents.

With respect to Request No. 82, Jolie has already produced responsive participation statements as to 2020–21, and the 2017–19 statements are likely maintained in the same or similar files. Producing them should require only that Jolie return to the files she has already located and pull the same category of documents for three additional years, which thus far have not required any redactions (and would not seem to).

Jolie also previously offered to provide income information for the full period. Having done so, she cannot credibly argue that the requested production is unduly burdensome.

E. All other objections are waived.

Jolie also objected that Requests Nos. 81 and 82 revisit issues from prior discovery requests. That objection is moot given Jolie's agreement to produce a subset of responsive documents. It is also wrong.

The Set Three Requests at issue here are significantly narrower and more targeted than the Set Two Requests to which Jolie previously objected. Plaintiffs now seek only documents sufficient to show Jolie's income and profit participation payments for the period between the parties' separation and the 2021 Transaction. By contrast, the earlier requests (which Plaintiffs are no longer pursuing) sought broader categories of documents concerning Jolie's allegation that Château Miraval was her "most important asset" and documents concerning all of her assets, property, and financial interests at the time of the Transaction, without any limitation.

III. Conclusion

For the foregoing reasons, Plaintiffs respectfully request that the Court direct Jolie to produce documents sufficient to show her income and profit participation payments responsive to Request Nos. 81 and 82 for the period 2017 through 2019. Plaintiffs look forward to discussing the issues at the IDC.

DATED: June 18, 2026

By: ______________________
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PROOF OF SERVICE

Pitt v. Jolie
Case No. 22STCV06081

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 1875 Century Park East, 23rd Floor, Los Angeles, CA 90067-2561.

On June 18, 2026, I served the following document(s) described as PLAINTIFFS' IDC STATEMENT REGARDING REQUESTS FOR PRODUCTION NOS. 81 & 82 on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused the document(s) to be sent from e-mail address ccinnater@birdmarella.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

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

Executed on June 18, 2026, at Los Angeles, California.

Cheryl Cinnater

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