

1 Edward Y. Lee (SBN 171996)
 2 Christopher P. Fields (SBN 174155)
 3 LEE & FIELDS
 4 A Professional Corporation
 5 3701 Wilshire Boulevard, Suite 510
 6 Los Angeles, CA 90010
 7 (213) 380-5858

8 Attorneys for Plaintiff,
 9 Frederic Von Anhalt, an individual

FILED

LOS ANGELES SUPERIOR COURT

MAR 14 2007

JOHN A. CLARKE, CLERK

Stephanie Funk
BY STEPHANIE FUNK, DEPUTY

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
 11 FOR THE COUNTY OF LOS ANGELES - WEST DISTRICT

12 FREDERIC VON ANHALT, an individual,
 13 Plaintiff,

14 vs.

15 BILL O'REILLY, an individual, FOX
 16 NETWORK, a Delaware corporation, and
 17 DOES 1 through 50, inclusive,
 18 Defendants.

Case No.: SC093126

COMPLAINT FOR DAMAGES
(Defamation - Slander)

INITIAL CASE MANAGEMENT REVIEW
AND CONFERENCE JUL 02 2007

JACQUELINE CONNOR

*Dept I
8:30AM*

COMES NOW Plaintiff FREDERIC VON ANHALT and hereby alleges as follows:

PARTIES

- 19 1. Plaintiff FREDERIC VON ANHALT is a competent adult and a resident of Los
 20 Angeles, California.
- 21 2. Plaintiff is informed and believes and thereon alleges that, at all times herein
 22 relevant, Defendant BILL O'REILLY (hereinafter "O'REILLY") was an individual residing in
 23 the County of Los Angeles, California and is a talk show host of the O'REILLY FACTOR on
 24 FOX NETWORK.
- 25 3. Plaintiff is informed and believes and thereon alleges that, at all times herein
 26 relevant, Defendant FOX NETWORK (hereinafter referred to as "FOX") was a Delaware
 27 corporation doing business in California.
 28

FIRST CAUSE OF ACTION**(Defamation; For Slander)**

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3 9. Plaintiff hereby incorporates by this reference paragraphs 1 through 8 above,
4 inclusive, as though fully set forth herein.

5 10. On or about February 23, 2007 on the O'REILLY FACTOR, Defendants,
6 O'REILLY, FOX, and Does 1 through 50, inclusive, and each of them, orally published false and
7 unprivileged statements concerning Plaintiff. Such statements included ones stating on a
8 nationally televised TV show, the O'REILLY FACTOR, that Plaintiff is a "fraud" with respect
9 to Plaintiff's claim of potentially fathering Anna Nicole Smith's Child Dannielynn.

10 11. These statements tended to directly injure Plaintiff's reputation in a substantial
11 portion of his community.

12 12. Defendants knew that the statements were false and defamatory and/or published
13 the statements in reckless disregard of whether the matters was false and/or intentionally failing
14 to learn whether the matter was true or false.

15 13. As a proximate result of the said acts, Plaintiff has suffered general damages in
16 the amount of \$10,000,000.00.

17 14. As a further proximate result of the said acts, Plaintiff has suffered special
18 damages in an amount according to proof.

19 15. In doing the acts herein alleged, Defendants, and each of them, acted with a
20 conspicuous disregard of Plaintiff's right so as to constitute oppression and malice. Plaintiff is
21 therefore entitled to punitive and exemplary damages in an amount appropriate to punish or
22 make an example of Defendants, and each of them.

23 **WHEREFORE, Plaintiff prays for judgment as follows as to the above cause of**
24 **action, inclusive:**

- 25 1) For general damages in the amount of \$10,000,000.00.
26 2) For special damages according to proof;
27 3) For costs of suit;
28 4) For prejudgment interest and post-judgment interest according to law;

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- 5) For such other and further relief as the court may deem just and proper; and
- 6) For punitive and exemplary damages.

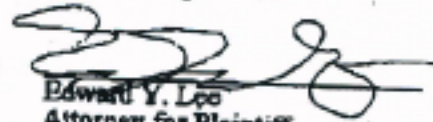
JURY DEMAND

Plaintiffs demand a trial by jury on all issues so triable.

DATED: March 13, 2007

LEE & FIELDS
A Professional Corporation

By:



Edward Y. Lee
Attorney for Plaintiff,
FREDERIC VON ANHALT

