

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ANDREA CONSTAND	:
Plaintiff	: CIVIL ACTION
	:
v.	: NO. 05-CV-1099
	:
WILLIAM H. COSBY, JR.	:
Defendant	:

**PLAINTIFF'S MOTION FOR INJUNCTIVE RELIEF AND OTHER
SANCTIONS FOR VIOLATIONS OF CONFIDENTIAL SETTLEMENT AGREEMENT
AND MOTION TO STRIKE FOOTNOTE 5 IN DEFENDANT'S BRIEF FILED AT
DOCUMENT NUMBER 102**

Plaintiff Andrea Constand by her undersigned counsel make this her Motion for Injunctive and other Equitable Relief for Violations of the Parties' Settlement Agreement and Motion to Strike Footnote 5 in Defendant's Brief Filed at Document Number 102 and avers as follows:

1. Jurisdiction over this matter is vested in the Court by agreement of the parties memorialized in a certain confidential settlement agreement.
2. Plaintiff seeks relief from the provisions of the agreement which prohibit her from making fair response to the numerous and inaccurate statements and innuendos publicized by defendant and his "camp" as well as correcting revisionist history promulgated by individuals peripheral to the suit.
3. On March 8, 2005, Plaintiff Andrea Constand filed an action against William Cosby in which she alleged that while visiting Cosby, whom she considered to be a mentor and grandfather figure, he gave her an unknown substance which he misrepresented was a "herbal

remedy” for a cold she had. Cosby then sexually assaulted her while she was in a semi-conscious state which left her unable to defend herself.

4. On or about October 3, 2006, Plaintiff entered into a Confidential Settlement Agreement, (the agreement), whereby the parties settled the case.

5. It was agreed that the amount of the settlement would remain confidential and that neither Cosby nor his undersigned counsel would disclose any defenses or make any public appearances or interviews about the information in 14(A) of the agreement, which includes not only Ms. Constand’s allegations but also the allegations made by the so called Jane Doe witnesses. The parties further agreed that they would not assist anyone else in making such statements. In addition, the parties agreed that disputes regarding violations of the agreement would initially be submitted to Magistrate Judge Thomas J. Rueter.

6. Defendant is a well known celebrity who employs numerous attorneys, publicists, agents and other individuals capable of manipulating the media.

7. Defendant has admitted to such media manipulation in the past in that he agreed to an exclusive interview with the National Enquirer in exchange for them to not print a story they had written as a result of an interview with one of Cosby’s accusers. (See. Document 50, p. 49)

8. Plaintiff is devoid of such resources and is incapable of policing defendant and his surrogates to insure their compliance with the terms of the agreement.

9. At the time of the litigation between the parties 13 women came forward as Rule 415 witnesses. Each of the women claimed to have been assaulted in a manner similar to the assault perpetrated upon plaintiff, that is, each claimed that Cosby gave them a drug and then

had sexual contact with them while they were unable to respond to the acts being perpetrated upon them. Although some of the women engaged in consensual relations with Cosby, their accounts substantiated defendant's alleged predilection for somnophilia.

10. Although the women were known as the "Jane Does", Cosby successfully petitioned the Court to permit their names to be made public.

11. On or about, November 16, 2014, Cosby by his attorney issued the statement which is attached hereto as Exhibit A. In that statement, Cosby claimed the allegations of his accusers had been "discredited." Exhibit A is reprinted from one of multiple media that published the statement from "Cosby's camp."

12. Plaintiff's counsel immediately protested the statement as a violation of the agreement and a joint statement was issued which reads: "The statement released by Mr. Cosby's attorney over the weekend was not intended to refer in any way to Andrea Constand. As previously reported, differences between Mr. Cosby and Ms. Constand were resolved to the mutual satisfaction of Mr. Cosby and Ms. Constand years ago. (See Exhibit B) Despite the retraction, most of the media outlets publicized the first statement, not the second.

13. On November 23, 2014, Cosby issued a statement saying he would not respond to innuendos. (See Exhibit C)

14. On November 20, 2014, Cosby asked AP to not use an statement in which he questioned their "integrity" for asking about the rape accusations. (Exhibit D)

15. As the momentum of women coming forward to recount their experiences increased, Cosby by his various representatives have engaged in repeated violations of the confidentiality agreement.

16. In a December 7, 2014, defendant's counsel Patrick O'Connor, Esquire was quoted as giving his opinion s to Cosby's guilt or innocence, "If this conduct is true, Bill Cosby has major issues," he said. "Bill's got to live with that. But maybe, if he's innocent and the relations were consensual—wow." Again counsel for plaintiff objected. (See Exhibit E)

17. On December 14, 2014, defendant's wife compared the accusations against her husband to a discredited article about an alleged rape. (See Exhibit F)

18. Since November, 2014, approximately 49 women have come forward to publically allege sexual misconduct perpetrated upon them by Cosby.

19. Three women including two whom were Rule 415 witnesses filed suit against Cosby in Massachusetts.

20. On June 5, 2015 the Massachusetts plaintiffs issued a subpoena to co-counsel, Dolores M. Troiani. Cosby objected to the subpoena and the Honorable Court issued a stay while a Motion to Dismiss filed by Cosby was pending in the Court in Massachusetts.

21. On or about June, 2015, The Associated Press filed a motion to unseal the pleadings in the instant case

22. On June 6, 2015, defendant filed a Brief in Opposition to the Motion to Unseal and in that brief at footnote 5, defendant accused counsel of violating F. R. Civ. Proc. 11 by averring that counsel made "misrepresentations as to Questions 2, 9, 10, 15, 26 and 41." (Document 102 at p. 14)

23. Plaintiff's counsel wrote to each of defendant's counsel of record and demanded that the footnote be stricken in that 1) the brief failed to reveal that on January 31, 2006, the Honorable Eduardo C. Robreno ordered defendant to answer the questions at issue, 2) the

footnote is scandalous and impertinent material in that it is immaterial and inappropriate to the proof of the cause of action, 3) its sole purpose seems to be to soil the reputations of plaintiff's counsel in a public forum where counsel has no ability to defend themselves, 4) it violates the confidentiality agreement in that defendant revealed information which was not public prior to the filing. (Exhibit E)

24. Cosby's representatives refused to withdraw the footnote. It now remains a public accusation, in keeping with Cosby's style of branding every woman who has taken a position adverse to Cosby as a liar. In this instance he did so in a brief so that there is no recourse against it, but the intercession of the Court requested in this motion.

25. On July 6, 2015, the Honorable Court unsealed the pleadings in this case.

26. That evening ABC News reported that "Cosby's Camp" had issued the following statement: "The only reason Mr. Cosby settled was because it would have been embarrassing in those days to put all those women on the stand and his family had no clue. That would have been very hurtful."

27. Plaintiff's counsel immediately contacted ABC News and requested a copy of the statement. In response, counsel received the e-mail which is attached hereto as Exhibit G.

28. ABC News, a respected news outlet claims it cannot determine the author of the statement.

29. It is believed and therefore averred that at least one of Cosby's many lawyers has stated that he did not release the statement. Nonetheless, the statement has been repeated in numerous media outlets and ABC News attributes it to "Cosby's Camp."

30. Cosby's behaviors have caused plaintiff unwanted and overwhelming media attention, which has detrimentally affected her. On July 7, 2015, a reporter "ambushed" her at her place of business, took her picture and the "quoted" her in the newspaper.

31 Throughout this ordeal plaintiff has denied all requests for interviews in spite of the fact the Cosby himself has given a rather incoherent interview and used members of his family and others as surrogates to speak for him. On May 15, 2015, Cosby appeared on ABC News and was asked if he was concerned the allegations would overshadow his message to improve education, he said: "I've been in this business 52 years. I've never seen anything like this. And reality is the situation. And I, I can't speak." (See Exhibit G)

32 Because the unsealed pleadings do not reveal the answers to the questions to which there were objections, and to which defendant was eventually ordered to provide, the public is left with the impression, as some commentators have opined, that the seminal question of his admission as to administering quaaludes to sex partners was taken out of context.

31. Because there are so many undisclosed spokesmen for Cosby, and because of Cosby's proven record of press manipulation, plaintiff does not know if the commentators are part of "Cosby's Camp."

33. Because of plaintiff's counsel's inability to respond, the allegations in footnote 5 in defendant's brief remain in the public record. They were clearly intended as a further manipulation of the public's impression of the merit of plaintiff's claims and the character of her counsel.

34 Plaintiff has come to the realization that she once again must defend herself in the forum chosen by defendant.

35 In that defendant has chosen to ignore the confidentiality provisions of the settlement agreement, Plaintiff requests that this Honorable Court release the entire deposition transcripts and further release plaintiff and her counsel from those same provisions which defendant has chosen to ignore.

36 There can be no doubt that each of the women about whom Cosby was questioned in his deposition have an intense interest in discovering what he said about them.¹

37 Further, in that some of them have now brought suit against him or are contemplating suit against him they have a right to determine what if anything can be used as evidence in their respective cases. It also relieves plaintiff's counsel as custodian of the information from being embroiled in litigation to which neither they nor their client is a party.

38. But for Cosby's repeated violations of the confidentiality agreement and attempt to sway public opinion in his favor this motion would not have been necessary. Defendant has opened the door to the relief sought by his continuing actions and those of his "camp."

39. It is a violation of the confidentiality agreement that defendant should be able to use the agreement in his defense while plaintiff is prohibited from responding.

40. Plaintiff seeks to have the entire deposition and settlement agreement released to the public so that the public can make a determination as to whether or not the statements and questions were taken out of context.

41. It is believed and therefore averred the release of these documents will assist other

¹ Plaintiff's counsel has been able to contact 9 of the 13 women and alert them that this motion would be filed and that their names may be revealed.. It is believed that one of the Jane Does is deceased. Because of the agreement, none of the women could be told what was said about them. Of the remaining ones we were able to contact, none have voiced any objection.

women who have been victimized and bring awareness to the fact that sexual assault is not just committed with a gun or knife but is also committed by mentors who engage in exploitative behaviors.

WHEREFORE, Plaintiff prays this Honorable Court to negate the confidentiality portions of the settlement agreement, to strike footnote 5 of Document 102, and grant such equitable relief as the Court deems appropriate.

Respectfully submitted,



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Troiani & Gibney, LLP
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Berwyn, PA 19312



Bebe H. Kivitz, Esquire
Jacobs Kivitz & Drake LLC
1525 Locust Street
12th Floor
Philadelphia, PA 19102

Attorneys for Plaintiff

Exhibit “A”

THE WEEK

SUBSCRIBE

Bill Cosby's attorney lambastes 'decade-old, discredited allegations' of rape

November 16, 2014



Ethan Miller / Getty Images

Bill Cosby's camp is responding to the renewed public attention to the allegations of rape that have been leveled against the legendary entertainer, with a statement released on Sunday by his attorney.

"Over the last several weeks, decade-old,

discredited allegations against Mr. Cosby have resurfaced. The fact that they are being repeated does not make them true. Mr. Cosby does not intend to dignify these allegations with any comment. He would like to thank all his fans for the outpouring of support and assure them that, at age 77, he is doing his best work. There will be no further statement from Mr. Cosby or any of his representatives." [John P. Schmitt, lawyer for Bill Cosby]

Multiple women have accused Cosby of sexual assault over the years, though the comedian has never been convicted of any charge. The assertions have come back into the public eye in recent months, helped in part by comedian Hannibal Buress publicly incorporating them into a stand-up routine.

Last week, former aspiring actress Barbara Bowman wrote a special piece in *The Washington Post* restating her past allegations against Cosby.

In the last few days, a planned appearance by Cosby on CBS' *Late Show with David Letterman* was abruptly canceled, without a public explanation. —*Eric Kleefeld*

IN A GALAXY FAR, FAR AWAY

The next *Star Wars* spin-off movie will be a Han Solo origin story

4:13 p.m. ET



Ethan Miller/Getty Images

That galaxy far, far away just keeps getting more crowded. According to *The Hollywood Reporter*, Disney has yet another expansion of the

Exhibit “B”

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November 17, 2014

John P. Schmitt, Esquire
Patterson Bleknap Webb & Tyler, LLP
1133 Avenue of the Americas
New York, NY 10036-6710

RE: Constand v. Cosby, et al

Dear John:


We consider your statement that the allegations against your client William Cosby were "discredited" to be a violation of the confidentiality provisions of the Settlement Agreement in the above captioned matter. It was agreed that neither Cosby nor his undersigned counsel would disclose any defenses or make any public appearances or interviews about the information in 14(A) of the agreement which includes not only Ms. Constand's allegations but also the allegations made by others.

Ms. Constand has turned down all requests for interviews and statements. Every time the allegations are mentioned, Ms. Constand's name is also mentioned. Although I did not see it, my assistant tells me that the first page of the Complaint was shown on GMA. The Philadelphia Inquirer clearly linked your statement to my client. In fact, all of the reports about your statement link it to my client.

We demand a retraction or we will contact Judge Rueter. We believe we are entitled to issue a statement in fair response which clarifies that Ms. Constand's allegations were not discredited but rather were resolved to her satisfaction.

Please call me at your earliest convenience.

Very truly yours,



Dolores M. Troiani

cc: Andrea Constand
VIA ELECTRONIC MAIL



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Kardashian Over Her Rolling Stone
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Bill Cosby Clarifies Statement on Rape Accusations

November 18, 2014 04:04:53 GMT

Bill's lawyer says in a subsequent statement that his client's denials do not refer to Andrea Constand, the accuser whose civil lawsuit against the comedian was settled in 2006.

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MOBILE

Bill Cosby's lawyer has clarified his client's statement on the sexual abuse allegations. A new statement, released on Monday, November 17 on Bill's website, said that Bill's denials did not refer to Andrea Constand, the accuser whose civil lawsuit against the comedian was settled in 2006.

"Joint statement from Dolores Troiani, counsel to Andrea Constand, and John P. Schmitt, counsel to Bill Cosby," the statement read, "The statement released by Mr. Cosby's attorney over the weekend was not intended to refer in any way to Andrea Constand. As previously reported, differences between Mr. Cosby and Ms. Constand were resolved to the mutual satisfaction of Mr. Cosby and Ms. Constand years ago."

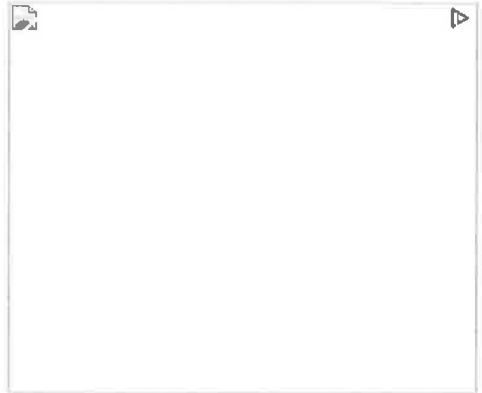
The statement concluded, "Neither Mr. Cosby nor Ms. Constand intends to comment further on the matter."

A previous statement issued by John on Sunday referred to "decade-old, discredited allegations" against Bill. John said, "The fact that [the allegations] are being repeated does not make them true," before adding that his client wouldn't address the allegations.

Later on that day, a new rape accuser named Joan Tarshis went forward with details of the alleged sexual assault. Joan claimed in her essay penned for Hollywood Elsewhere that Bill drugged and raped her twice when she was 19.

Last week, another alleged victim of Bill named Barbara Bowman also went public with her op-ed penned for Washington Post. She alleged the 77-year-old comedian drugged and raped her in 1980s.

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IN FOCUS



Stars Mourn
Legendary
Producer Jerry
Weintraub's Death

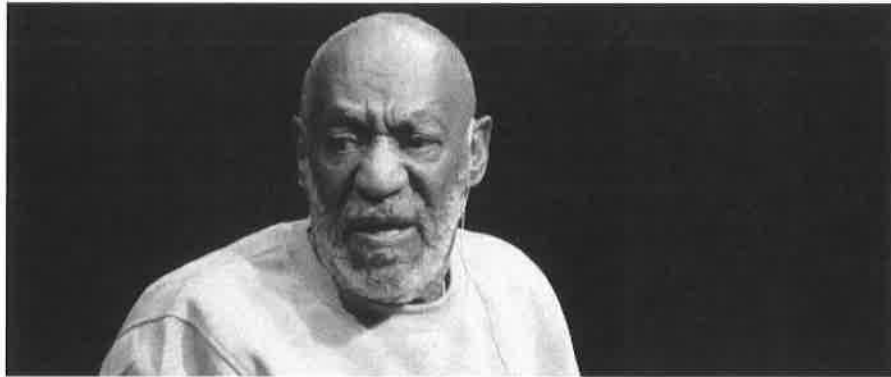
Exhibit “C”

July 8, 2015

Bill Cosby Says He Won't Answer To 'Innuendos'

The Huffington Post | By [Erin Whitney](#)

Posted: 11/22/2014 1:14 pm EST | Updated: 11/23/2014 12:59 pm EST



Before Bill Cosby took the stage at a [sold-out theater in Melbourne, Florida](#) on Friday night, he broke his silence on the recent [sexual assault allegations](#).

While speaking with Florida Today, the 77-year-old comedian addressed the claims and revealed his reason for silence. "[I know people are tired of me not saying anything, but a guy doesn't have to answer to innuendos](#)," Cosby told the publication. "People should fact check. People shouldn't have to go through that and shouldn't answer to innuendos."

In addition to the Florida Today interview, Cosby's lawyer, Marty Singer, released a statement to ABC News on Friday about his client:

"This situation is an unprecedented example of the media's breakneck rush to run stories without any corroboration or adherence to traditional journalistic standards. Over and over again, we have refuted these new unsubstantiated stories with documentary evidence, only to have a new uncorroborated story crop up out of the woodwork. When will it end?"

Cosby has previously refused to answer questions regarding allegations that he [sexually assaulted several women](#). In an interview with NPR's Scott Simon broadcast on Nov. 15, [Cosby shook his head and remained silent](#) when asked to respond to the claims. Cosby also refused to respond to the AP's Brett Zongker regarding the allegations, saying, "[No, no, we don't answer that](#)." He later requested, still on the record, [that the AP interview be "scuttled."](#)

For more from Cosby, head to [Florida Today](#). Singer's [full statement is available at ABC](#).

MORE: [Bill Cosby](#) [Bill Cosby Silence](#) [Bill Cosby Allegations](#) [Bill Cosby Sexual Assault](#) [Bill Cosby Rape](#) [Bill Cosby Rape Allegations](#) [Bill Cosby Accusations](#) [Bill Cosby Florida](#) [Bill Cosby Sexual Assault Allegations](#) [Bill Cosby Controversy](#) [Bill Cosby Npr](#) [Bill Cosby Florida Show](#)

Conversations

33 comments

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Denise Plante Terry · Broad Brook, Connecticut

If only it were just "innuendo"! It seems Mr. Cosby needs to buy a dictionary. "Innuendos" are "oblique comments, hints, or suggestions - usually derogatory". None of the twelve women that have spoken up recently are "hinting" or "suggesting" that Cosby did anything violent, sexual, and inappropriate; they are stating it clearly.

Reply · Like · 27 · November 22, 2014 at 11:02am



Arnle Sweepopolis · Top Commenter

Legal experts at CNN, AP, etc. have said that Cosby more than likely must [stay silent due to a gag order from the 2006 Colorado settlement](#). He

Exhibit “D”

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CBS/AP / November 20, 2014, 12:08 AM

Bill Cosby on sexual assault allegations: "I don't talk about it"

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Last Updated Nov 20, 2014 7:58 AM EST

NEW YORK --The first video has surfaced of comedian Bill Cosby responding to a growing number of sexual assault allegations.

The Associated Press released footage Wednesday night from an interview it conducted with Cosby on Nov. 6, when the comedian was promoting an exhibit of artwork he and his wife had lent to the Smithsonian Institution. The video was first published by Time Magazine.

At the time, the story involved long-circulated accusations from several women and recent criticism from comedian Hannibal Buress. Cosby declined to comment, saying "We don't answer that."

"And I'll tell you why," Cosby said. "I think you were told... and I don't want to compromise your integrity, but we don't, I don't talk about it."



Play VIDEO

More fallout from Bill

After his initial refusal to comment -- as the interview was winding down but with the camera still running and Cosby wearing a lapel microphone -- the comedian asked the AP to not use the brief on-camera refusal to comment he had just made about the allegations.

"Of what value will it have? And I would appreciate it if it was scuttled," Cosby told the

Cosby rape allegations

reporter. "I think if you want to consider yourself to be serious, that it will not appear anywhere."

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Cosby added, "And we thought, by the way, that since it was AP it wouldn't be necessary to go over that question with you... We thought the AP had the integrity to not ask."

The AP said the interview was on the record and that it had made no agreement to avoid questions about the allegations or to withhold publishing any of his comments at any time.



Play VIDEO

Model claims Bill Cosby sexually assaulted her in 1982

Since the interview was taped, five women have come forward publicly to accuse him of sexual assault. Netflix, TV Land and NBC have cut ties with Cosby and an appearance on "The Late Show With David Letterman" has been canceled.

As the allegations gained increasing attention, the AP said it went back through the full video of the Nov. 6 interview and decided to publish Cosby's full reaction to questions about the claims.

The scandal, which involves allegations that were widely reported on a decade ago as well as new accusations, has gravely damaged the 77-year-old comedian's reputation as America's TV dad just as he was launching a comeback.

Cosby has never been charged in connection with any of the allegations, which his attorney strongly denies.

Former Pennsylvania prosecutor Bruce L. Castor Jr., who investigated a woman's claims that Cosby had sexually assaulted her in 2004, said Wednesday he decided not to prosecute because he felt there was not enough evidence to get a conviction.

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Math error at Museum of Science caught by 15-year-old



Feds: San Francisco pier shooting suspect deported 5 times

Exhibit “E”

RE: Pat O'Connor's interview with the NY Times - Bebe Kivitz

Page 1 of 2

RE: Pat O'Connor's interview with the NY Times

Konopka, Joann <JKonopka@cozen.com> on behalf of
O'Connor, Patrick <POConnor@cozen.com>

Mon 12/8/2014 2:06 PM

To: Bebe Kivitz <bkivitz@jskhlaw.onmicrosoft.com>;

Can you send me the article. I never discussed the Constand case.

From: Bebe Kivitz [mailto:bkivitz@jskhlaw.onmicrosoft.com]
Sent: Monday, December 08, 2014 12:52 PM
To: O'Connor, Patrick
Subject: Fw: Pat O'Connor's interview with the NY Times

Pat, this did not go through the first time. Bebe

Bebe H. Kivitz, Esquire

Jacobs Kivitz & Drake LLC

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Philadelphia, PA 19102

Phone No. 215-732-2656

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From: Bebe Kivitz
Sent: Monday, December 08, 2014 12:50 PM
To: jpschmitt@pbwt.com; poconnor@cozen.c
Cc: dmt@tglawoffice.com
Subject: Pat O'Connor's interview with the NY Times

Jack, Pat, I also represent Andrea currently, and you can note my firm information below. Pat's statements were reported earlier today by the New York Times. In addition to raising the issues

RE: Pat O'Connor's interview with the NY Times - Bebe Kivitz

Page 2 of 2

of consent and innocence ("wow"), the statements to the press also appear to constitute an interview in violation of Section 14B. of the settlement agreement. Bebe

Bebe H. Kivitz, Esquire

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The New York Times | <http://nyti.ms/1CWGIS5>

U.S.

Philadelphia Laments Bill Cosby's Now-Tarnished Image

By TRIP GABRIEL DEC. 7, 2014

PHILADELPHIA — It was seven weeks ago that a stand-up comic named Hannibal Buress ripped into a local icon at the Trocadero Theater here, calling Bill Cosby a “rapist” and setting in motion a cascade of ugly allegations that threaten to undermine an image Mr. Cosby built over decades.

Nowhere has the precipitous fall of Mr. Cosby been more acutely felt than in Philadelphia, where he was a cherished native son who shot to fame spinning humorous tales of a childhood in public housing. He became a philanthropist and cheerleader for his hometown, not least through the Temple sweatshirts that he wore onstage and on “The Cosby Show” and that put his alma mater on the map.

As recently as Veterans Day, Mayor Michael A. Nutter acknowledged Mr. Cosby at a ceremony on the Benjamin Franklin Parkway, saying, “Thank you, sir, for everything.”

But as more than 15 women have publicly accused the comedian of assault, often after drugging them, his hometown has plunged into a re-examination of his life and ties to the city. It is a process painful and sad, as residents try to square the image of Mr. Cosby as a beloved father figure,

extolling on TV and in books the value of education and intact African-American families, with allegations of his sexual violence toward women going back five decades.

Last Monday, Mr. Cosby resigned from the board of Temple University amid a pressure campaign by students and alumni.

He was the face of the school nationwide, speaking at graduations, and as recently as at the freshman convocation in August.

On campus, students were largely relieved that he had stepped down. "A lot of people don't want him here," said Adaisah Johnson, 19, a sophomore from Freehold, N.J.

Another sophomore, Eva Arce, 20, from North Philadelphia like Mr. Cosby, recalled him as "a cool dad figure" from her childhood, and regretted his fall from that pedestal.

"It's kind of sad knowing one of the major Philly icons is not going to be up there anymore and will be looked at in a bad light," she said.

Cindy Bass, a City Council member who grew up in North Philadelphia and attended Temple, credited Mr. Cosby with bringing national recognition to the 37,000-student university, a haven for poor and working-class students.

"But it is important to note that I know Cliff Huxtable, the family man who was welcomed into my living room every Thursday night. I don't know Bill Cosby," she said in a written statement.

She said Mr. Cosby's resignation should spur the university to re-examine the issue of sexual assault. Temple was one of 55 colleges named as targets of a federal investigation this year for mishandling complaints of sexual violence. Women "are ashamed about what took place and terrified of the potential for public humiliation" if they report assaults, Ms. Bass said.

A growing national awareness of the issue, echoed in cases in the military and on campuses, seems to explain part of why the allegations against Mr. Cosby, first made more than a decade ago, have resurfaced with such force.

None of the earlier accounts led to criminal charges. A suit filed by a Temple athletic department administrator against Mr. Cosby in 2005 was settled out of court. The matter largely faded, but after Mr. Buress's anti-Cosby

rant in Philadelphia on Oct. 16 ("You leave here and Google 'Bill Cosby rape.' It's not funny," he said.) the issue went viral on social media and burst back to life.

On Tuesday, Mr. Cosby was sued for a second time, by a California woman, Judy Huth, who claimed he molested her in the Playboy Mansion in Los Angeles in 1974 when she was 15. The Los Angeles police are investigating.

On Wednesday, two women who had not previously spoken out appeared at a news conference in Los Angeles to accuse Mr. Cosby, including one who said the comedian invited her to his hotel room in Las Vegas in 1986, drugged her and sexually assaulted her.

Last month, Mr. Cosby's lawyer posted a statement — since removed — on the comedian's website that said Mr. Cosby would not "dignify these allegations with any comment."

On Twitter, Mr. Cosby last week thanked two celebrities for supporting him, Whoopi Goldberg and the singer Jill Scott, a Philadelphia native, who wrote on Twitter that the accusations had not been proved, adding, "This is insane."

But mostly, as accusers have continued to come forward and universities, television networks and even the Navy cut ties with Mr. Cosby, his prominent hometown defenders have fallen silent. Both the mayor and Representative Chaka Fattah of North Philadelphia, who in November called for a "Bill Cosby Month," declined to comment last week.

As the University of Massachusetts and High Point University in North Carolina ended relationships with Mr. Cosby, Temple, where he had been on the board since 1982, resisted.

An online petition started by an alumnus gathered hundreds of signatures calling on the college to cut ties, and the opinion editor of The Temple News, the student paper, demanded that the administration "stop deifying" Mr. Cosby.

Last Monday, trustees were holding a conference call to discuss Mr. Cosby when he independently phoned Patrick O'Connor, the chairman of the board, to say he would resign, Mr. O'Connor said.

"It is sad for Temple and sad for Bill," he said.

Mr. O'Connor, a lawyer, defended Mr. Cosby in the 2005 suit brought by the former administrator of the Temple women's basketball team, Andrea Constand. She accused him of giving her pills during a visit to his home in Cheltenham, a Philadelphia suburb, and of touching her breasts and genitals against her wishes.

Mr. O'Connor said the terms of the settlement prevent him from stating an opinion of Mr. Cosby's guilt or innocence. "If this conduct is true, Bill Cosby has major issues," he said. "Bill's got to live with that. But maybe, if he's innocent and the relations were consensual — wow."

On Broad Street in North Philadelphia, a mural depicts Mr. Cosby in a loose purple sweater, his trademark look from "The Cosby Show."

On the hit 1980s series, he was Cliff Huxtable, the wise head of an affluent black family in which both parents were professionals. Off the air, Mr. Cosby urged black parents to teach the importance of education and hard work, and he criticized pop culture's glorification of sex and drugs.

The mural, painted to mark Father's Day, places Mr. Cosby between Desmond Tutu and Nelson Mandela.

Passing by, Malik Evans, 29, a barber, said he was skeptical of the accusations. He suggested Mr. Cosby's accusers were looking for a piece of his fortune. "Personally, I don't believe the girls," he said.

Nicole Cooper, 33, who works as an assistant at a nearby laundry, said that with so many accusers telling similar stories, she found them credible. "You can't just say he didn't do it because he was Cliff Huxtable," she said.

She recalled Mr. Cosby walking the neighborhood during a street festival a couple of years ago, eagerly and enthusiastically hailed.

"Everybody's looking at things a little differently now," she said. "I think he let a lot of people down."

Correction: December 8, 2014

A picture caption with an earlier version of this article misidentified the individual to the right of Bill Cosby on a mural in North Philadelphia. He is the

Rev. Paul Washington, an Episcopal priest and community activist, not Desmond Tutu.

A version of this article appears in print on December 8, 2014, on page A13 of the New York edition with the headline: Philadelphia Laments Native Son Cosby's Now-Tarnished Image.

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Exhibit “F”

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Style Blog

Camille Cosby breaks her silence, compares allegations against her husband to Rolling Stone's campus rape story

By Elahe Izadi December 15, 2014

In her first public comments since an avalanche of negative stories about her husband began, Camille Cosby criticized the media for publishing rape allegations against Bill Cosby without “vetting” his accusers — and she compared the news coverage of those allegations to Rolling Stone’s explosive story about campus rape.

The University of Virginia “story was heart-breaking, but ultimately appears to be proved to be untrue. Many in the media were quick to link that story to stories about my husband — until that story unwound,” Camille Cosby said in a statement, which was first reported by CBS News and then ABC News. “None of us will ever want to be in the position of attacking a victim. But the question should be asked — who is the victim?”

Rolling Stone’s story about campus rape at U-Va. sparked widespread rage and calls for action by the school’s administrators. But reporting by The Washington Post cast new doubt on the narrative of a brutal gang rape, and Rolling Stone has since apologized for the story, which it is now re-reporting.

Camille Cosby also said the media has “given a pass” to those accusing her husband of rape and other forms of sexual assault.

The Washington Post reported on the allegations last month in a front-page story, less than two weeks after publishing this first-person essay by Barbara Bowman: “Bill Cosby raped me. Why did it take 30 years for people to believe my story?”

Here is [Camille Cosby’s full statement](#):

I met my husband, Bill Cosby, in 1963, and we were married in 1964. The man I met, and fell in love

with, and whom I continue to love, is the man you all knew through his work. He is a kind man, a generous man, a funny man, and a wonderful husband, father and friend. He is the man you thought you knew.

A different man has been portrayed in the media over the last two months. It is the portrait of a man I do not know. It is also a portrait painted by individuals and organizations whom many in the media have given a pass. There appears to be no vetting of my husband's accusers before stories are published or aired. An accusation is published, and immediately goes viral.

We all followed the story of the article in the "Rolling Stone" concerning allegations of rape at the University of Virginia. The story was heart-breaking, but ultimately appears to be proved to be untrue. Many in the media were quick to link that story to stories about my husband – until that story unwound.

None of us will ever want to be in the position of attacking a victim. But the question should be asked – who is the victim?

Atlanta's Spelman College on Sunday suspended an academic chair named after the Cosbys in honor of their \$20 million endowment — the single largest donation to a historically black college.

Bill Cosby was asked over the weekend how his wife of 50 years was handling the wave of allegations, which have led to projects being canceled and numerous institutions distancing themselves from the comedian. Cosby told the New York Post: "Love and the strength of womanhood. Let me say it again, love and the strength of womanhood. And, you could reverse it, the strength of womanhood and love."

Elahe Izadi is a general assignment national reporter for The Washington Post.

Exhibit “G”

Dolores M. Troiani

From: Rahmanzadeh, Shahriar <Shahriar.Rahmanzadeh@abc.com>
Sent: Tuesday, July 07, 2015 9:17 AM
To: dmt@tglawoffice.com
Subject: Comment from Cosby's Camp

Hi Dolores - was only a statement. Here it is below. Cell is the best way to reach me **917.554.1115**. Thanks.

"The only reason Mr. Cosby settled was because it would have been embarrassing in those days to put all those women on the stand and his family had no clue. That would have been very hurtful."

Shah Rahmanzadeh
ABC News, *Good Morning America*
office 212.456.2309
cell 917.554.1115

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

ANDREA CONSTAND

Plaintiff

v.

WILLIAM H. COSBY, JR.

Defendant

:
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:
:
:
:

CIVIL ACTION

NO: 05-CV-1099

CERTIFICATE OF SERVICE

I, Dolores M. Troiani, Esquire, hereby certify that on July 8, 2015, I caused a true and correct copy of the foregoing Plaintiff's Motion for Injunctive Relief and Other Sanctions for Violations of Confidential Settlement Agreement and Motion to Strike Footnote 5 in Defendant's Brief Filed at Document Number 102 via the court's electronic filing system as follows:

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Date: 7/8/2015