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The Regents of the University of California
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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES**
10 **WEST DISTRICT (SANTA MONICA)**
11

12 THE REGENTS OF THE UNIVERSITY OF)
CALIFORNIA,)

13)
14 Plaintiff,)

15 vs.)

16 UCLA PRIMATE FREEDOM; ANIMAL)
LIBERATION BRIGADE; ANIMAL)
LIBERATION FRONT; LINDA FAITH)
17 GREENE (AKA LINDY GREENE);)
HILLARY RONEY; KEVIN OLLIFF;)
18 RAMIN SABER; TIM RUSMISEL and)
DOES 1-100, inclusive,)

19)
20 Defendants.)
21)

Case No.

**COMPLAINT FOR INJUNCTIVE
RELIEF - PRELIMINARY AND
PERMANENT INJUNCTIONS**

**(Harassment – C.C.P. § 527.6; Trespass;
Intentional Infliction of Emotional Distress;
Violation of California Constitutional Right
to Privacy; Intrusion Into Private Affairs;
Intentional Interference With Business
Relations)**

22
23 Plaintiff The Regents of the University of California brings this action for preliminary and
24 permanent injunctive relief under the laws of California as follows:

25 /////
26 /////
27 /////
28

INTRODUCTION

1
2 1. Plaintiff The REGENTS OF THE UNIVERSITY OF CALIFORNIA ("The
3 REGENTS") is a California public corporation that is the governing body for the University of
4 California system, with authority over the affairs, operations, employees, policies and procedures
5 of the ten University of California campuses, including the University of California, Los Angeles
6 ("UCLA"), and is established pursuant to the California Constitution, Article IX, Section 9.

7 2. Because Defendants believe that employees and students of The REGENTS use
8 animals in their research, oversee those who use animals in their research, or support those who
9 use animals in their research, The REGENTS and their employees have become the target of
10 numerous animal rights groups. In recent years, several inter-related groups have emerged with
11 the expressly stated goal of ending animal research at UCLA. Defendants ANIMAL
12 LIBERATION FRONT ("ALF"), ANIMAL LIBERATION BRIGADE ("ALB"), and UCLA
13 PRIMATE FREEDOM, along with several individuals, have engaged in a coordinated campaign
14 of harassment, intimidation, vandalism, and physical violence specifically targeted against The
15 REGENTS and its employees and/or students.

16 3. From the beginning, ALF and ALB have renounced traditional, lawful, non-violent
17 methods of accomplishing their stated goals. Their campaign against employees of The
18 REGENTS began with unruly demonstrations on the UCLA campus, but quickly expanded to
19 target individuals in the conduct of their private lives. Employees began receiving threatening
20 telephone calls at their home phone numbers and packages at their home addresses containing
21 animal fur, oil, and razor blades. These harassing acts escalated to trespass and vandalism against
22 employees' real and personal property. Clad in black and wearing masks to conceal their
23 identities, persons affiliated with ALF and ALB entered employees' properties in the middle of the
24 night, shouted slogans and epithets through megaphones, and defaced employees' homes. UCLA
25 PRIMATE FREEDOM supports groups such as ALF and ALB by maintaining a list of "Targets"
26 on its webpage, www.uclaprimatelifreedom.com, which includes employees' photos, home
27 addresses and telephone numbers. UCLA PRIMATE FREEDOM also encourages the illegal
28 actions against employees of The REGENTS by participating in home and campus demonstrations

1 and by posting reports of the demonstrations and vandalism after such actions have occurred.
2 During demonstrations on the UCLA campus and at employees' homes, demonstrators can be
3 heard calling out "ALF" and "UCLA PRIMATE FREEDOM dot com."

4 4. As with their campaign against researchers at other universities and private
5 companies, the campaign against employees of The REGENTS has been steadily escalating in
6 intensity and ferocity. UCLA PRIMATE FREEDOM's webpage posted the home addresses of
7 several employees of The REGENTS as "targets" and encouraged its members and the larger
8 public to harass them. The webpage also included flyers accusing employees of violent acts
9 against animals that Defendants encourage others to distribute in employees' neighborhoods.
10 What started as public demonstrations has morphed into violent attacks. Employees listed as
11 "targets" have been under siege in their homes as the attacks make them fearful for their own
12 safety and that of their families.

13 5. The cycle of violence and threats reached new and potentially deadly levels
14 beginning in June 2006. Since June 2006, terrorists affiliated with ALF and ALB have planted
15 explosive devices near cars, on employee doorsteps, have flooded homes, and threatened similar
16 acts of violence.

17 6. With each threat and act of violence, ALF, ALB, UCLA PRIMATE FREEDOM
18 and the Individual Defendants have consistently stated that these acts are merely a "warning of
19 things to come." Chants made by the Individual Defendants ominously warn employees: "We
20 know who you are, we know what you look like, we know where you socialize, and best of all we
21 know where you live!" According to communiqués from these groups, these violent and illegal
22 acts "will only get worse from here. With every day that goes by . . . our anger and vengeance
23 grows."

24 7. The REGENTS, on behalf of their affected employees and students, now seek
25 preliminary and permanent injunctive relief to prevent Defendants from continuing their campaign
26 of harassment, intimidation, and abuse. The harm already done to The REGENTS' employees and
27 students is great and irreparable. If Defendants are not immediately restrained and enjoined, the
28

1 harassment will continue and escalate in severity, putting all of The REGENTS' employees and
2 students in imminent danger of suffering extreme and irreparable injury.

3 JURISDICTION AND VENUE

4 8. This Court has jurisdiction over this matter because the injuries that Plaintiff has
5 suffered, and the immediate threat of harm for which Plaintiff seeks permanent injunctive relief,
6 have occurred and will occur at employees' and students' homes and places of employment
7 throughout California.

8 9. Venue is proper in Los Angeles County pursuant to Code of Civil Procedure
9 Section 392 and/or Section 395. Employees of The REGENTS, have sustained damage to real and
10 personal property located in Los Angeles County. The immediate threat of harm to employees and
11 students of The REGENTS extends to property located within Los Angeles County and elsewhere
12 in California, and to those of The REGENTS' employees who work and/or reside in Los Angeles
13 County, as well as throughout California.

14 PARTIES

15 10. Plaintiff The REGENTS OF THE UNIVERSITY OF CALIFORNIA is a California
16 public corporation that is the governing body for the University of California system, with
17 authority over the affairs, operations, employees, policies and procedures of the ten University of
18 California campuses, and is established pursuant to the California Constitution, Article IX, Section
19 9. Its principal place of business is in Oakland, Alameda County, California.

20 11. The REGENTS are informed and believe, and on that basis allege, that Defendant
21 UCLA PRIMATE FREEDOM is an extremist animal rights organization and is a chapter of a
22 national organization, the Primate Freedom Project. UCLA PRIMATE FREEDOM maintains a
23 website on which it promotes and organizes its unlawful activity, www.uclaprimateliberty.com.
24 That webpage is registered to the following address: Primate Freedom Project, P.O. Box 1623,
25 Fayetteville, Georgia 30214.

26 12. The REGENTS are informed and believe, and on that basis allege, that Defendant
27 ANIMAL LIBERATION FRONT (ALF) is an extremist animal rights organization with
28 operations around the world, including the United States. ALF has an online press office which

1 promotes and facilitates its illegal activities. The ALF Press Office website,
2 www.animalliberationpressoffice.org, lists the organization's address as 6320 Canoga Avenue,
3 #1500, Woodland Hills, California 91367. ALF is currently subject to a Preliminary Injunction in
4 Santa Barbara County for its illegal and harassing actions against Wachovia Bank and its
5 employees.

6 13. The REGENTS are informed and believe, and on that basis allege, that Defendant
7 ANIMAL LIBERATION BRIGADE (ALB) (also known as the Revolutionary Cells – Animal
8 Liberation Brigade) is a violent extremist animal rights organization with operations around the
9 world, including the United States. In a communiqué posted anonymously to several websites,
10 ALB describes itself as follows:

11 Who are the revolutionary cells? It is an anti-gmo activist destroying a gmo crop, it
12 is a basque youth driving a car packed with explosives destined for a spanish
13 politician, it is a queer bashing back, a rape victim putting a bullet in the rapist, a
14 corsican nationalist planting a bomb at a french bank, it is a cincinatti riot in
15 response to police brutality, an animal liberationist shooting a vivisector dead on
16 his doorstep. In short it is the spirit of resistance realized. It is moving from
17 politics to praxis.

18 (Emphasis added). Anonymous communiqués regarding the illegal tactics of ALB are posted on
19 several websites, including the ALF Press Office website and UCLA PRIMATE FREEDOM's
20 website. In its communiqués, ALB regularly posts the home addresses and other personal
21 information of the victims of its assaults. ALB is sometimes referred to interchangeably with
22 ALF.

23 14. The REGENTS are informed and believe, and on that basis allege, that Defendant
24 LINDA FAITH GREENE (AKA LINDY GREENE) is associated with UCLA PRIMATE
25 FREEDOM, ALB, and ALF, as well as other extremist animal rights organizations, and has been
26 involved in the organizations' unlawful activity, including illegal and harassing conduct directed at
27 employees and students of The REGENTS. The REGENTS are informed and believe, and on that
28 basis allege, that GREENE resides in Valley Village, Los Angeles County, California. GREENE

1 is currently subject to a temporary restraining order in Los Angeles County for her harassment of
2 the ex-wife of a City of Los Angeles employee; the harassment is alleged to be centered on animal
3 rights issues. GREENE is also subject to a preliminary injunction in Los Angeles County for her
4 harassment of employees of POM Wonderful, the harassment is alleged to be centered on animal
5 rights issues.

6 15. The REGENTS are informed and believe, and on that basis allege, that Defendant
7 HILLARY RONEY is associated with UCLA PRIMATE FREEDOM, ALB, and ALF, as well as
8 other extremist animal rights organizations, and has been involved in the organizations' unlawful
9 activity, including illegal and harassing conduct directed at employees and students of The
10 REGENTS. The REGENTS are informed and believe, and on that basis allege, that HILLARY
11 RONEY is a resident of Los Angeles, California. RONEY is also subject to a preliminary
12 injunction in Los Angeles County for her harassment of employees of POM Wonderful, the
13 harassment is alleged to be centered on animal rights issues.

14 16. The REGENTS are informed and believe, and on that basis allege, that Defendant
15 KEVIN OLLIFF is associated with UCLA PRIMATE FREEDOM, ALB, and ALF, as well as
16 other extremist animal rights organizations, and has been involved in the organizations' unlawful
17 activity, including illegal and harassing conduct directed at employees and students of The
18 REGENTS. The REGENTS are informed and believe, and on that basis allege, that KEVIN
19 OLLIFF is a resident of Los Angeles County, California. KEVIN OLLIFF is currently subject to
20 a Preliminary Injunction issued on January 29, 2008 in Santa Barbara County for his illegal and
21 harassing actions against Wachovia Bank and its employees. OLLIFF is also subject to a
22 preliminary injunction in Los Angeles County for his harassment of employees of POM
23 Wonderful, the harassment is alleged to be centered on animal rights issues.

24 17. The REGENTS are informed and believe, and on that basis allege, that Defendant
25 RAMIN SABER is associated with UCLA PRIMATE FREEDOM, ALB, and ALF, as well as
26 other extremist animal rights organizations, and has been involved in the organizations' unlawful
27 activity, including illegal and harassing conduct directed at employees and students of The
28 REGENTS. The REGENTS are informed and believe, and on that basis allege, that RAMIN

1 SABER is a resident of Reseda, Los Angeles County, California. SABER is also subject to a
2 preliminary injunction in Los Angeles County for his harassment of employees of POM
3 Wonderful, the harassment is alleged to be centered on animal rights issues.

4 18. The REGENTS are informed and believe, and on that basis allege, that Defendant
5 TIM RUSMISEL is associated with UCLA PRIMATE FREEDOM, ALB, and ALF, as well as
6 other extremist animal rights organizations, and has been involved in the organizations' unlawful
7 activity, including illegal and harassing conduct directed at employees and students of The
8 REGENTS. The REGENTS are informed and believe, and on that basis allege, that TIM
9 RUSMISEL is a resident of San Clemente, Orange County, California.

10 19. The REGENTS are informed and believe, and on that basis allege, that Defendants
11 LINDA GREENE, HILLARY RONEY, KEVIN OLLIFF, RAMIN SABER, TIM RUSMISEL
12 and DOES 1 through 100 (collectively, the "Individual Defendants") were responsible for and
13 participated in the acts complained of herein and were at all relevant times representatives, co-
14 conspirators, acting in concert with, agents, followers, employees, partners, members, and/or
15 directors of UCLA PRIMATE FREEDOM, ALB, and/or ALF. The REGENTS are ignorant of the
16 true names and capacities of DOES 1 through 100 and therefore sue these defendants by fictitious
17 names. The REGENTS will amend this complaint to allege the true names and capacities of the
18 DOE defendants when their names and identities are revealed through discovery.

19 20. The REGENTS are informed and believe, and on that basis allege, that UCLA
20 PRIMATE FREEDOM, ALB, ALF, LINDA GREENE, HILLARY RONEY, KEVIN OLLIFF,
21 RAMIN SABER, TIM RUSMISEL and DOES 1 through 100 (collectively, "Defendants") were,
22 at all relevant times, the agents, followers, co-conspirators, employees, representatives, partners,
23 directors, and/or joint venturers of each other and were acting within scope of those relationships
24 when committing the unlawful acts described below. The REGENTS are further informed and
25 believe, and on that basis allege, that each Defendant ratified, authorized, aided, and/or abetted the
26 unlawful acts described below.

27 21. The REGENTS are informed and believe, and on that basis allege, that Defendants
28 conspired with each other to commit assault, trespass, property destruction, and harassment and to

1 make threats of violence against The REGENTS, their students, their employees and their
2 families, and to further cause them severe emotional distress.

3 **FACTUAL ALLEGATIONS**

4 **The Unlawful Campaign Against Animal Researchers**

5 22. The REGENTS oversee 10 university campuses across the state of California,
6 including UCLA. Students and employees of The REGENTS located at UCLA and elsewhere
7 conduct research, some of which involves the closely regulated use of animals.

8 23. In recent years, some extremist animal rights groups and their members and
9 followers have joined together in a coordinated campaign against The REGENTS. These groups
10 include UCLA PRIMATE FREEDOM, ALF, and ALB.

11 24. Unlike other animal rights groups, both ALF and ALB have expressly rejected
12 lawful, nonviolent means of accomplishing their goal. ALF provides advice to its followers on
13 ways to evade and deter law enforcement efforts. On its website, ALF encourages members to
14 download PGP, an email encryption software, and provides instructions, "If An Agent Knocks."
15 Through communiqués posted on various websites, ALF has taken credit for illegal and violent
16 actions across the country and internationally. ALF has been described as a domestic terrorist
17 threat in the United Kingdom, and in January 2005, was named as a terrorist threat by the United
18 States Department of Homeland Security.

19 25. The ALB is a self-described "revolutionary cell" that cites as an exemplary tactic
20 "an animal liberationist shooting a vivisector dead on his doorstep." Anonymous members of the
21 ALB publish communiqués regarding the illegal tactics of ALB on several websites. Such
22 communiqués are regularly posted on the website maintained by ALF's Press Office.

23 26. In their communiqués, ALF and ALB regularly post the home addresses and other
24 personal information of the victims of their assaults. Victims of these groups' campaign against
25 researchers at UCLA have been subjected to death threats, verbal abuse and violent attacks. They
26 have received packages rigged with razor blades, disturbing late-night phone calls, and late-night
27 acts of vandalism and terror, including attempted firebombings of cars and homes and flooding of
28 homes.

1 27. Rather than focus their demonstrations at workplace sites, ALF, ALB and UCLA
2 PRIMATE FREEDOM emphasize so-called "home visits." Masked persons working with ALF
3 and/or ALB and UCLA PRIMATE FREEDOM trespass onto the property of an employee of The
4 REGENTS, often at night. They attempt to terrorize the employee and family members by
5 violently pounding on the front door and shouting threats and obscenities through bullhorns; they
6 vandalize the employee's property by etching slogans on doors, firebombings, breaking windows,
7 and using hoses to flood homes. As they leave a "home visit," the activists warn the employee and
8 their family members that they will be back, often cite recent acts of violence taken against other
9 targets, and vow that they will "never back down." UCLA PRIMATE FREEDOM, ALF, and
10 ALB then praise, encourage and take credit for these illegal activities on their websites or in
11 communiqués posted on the websites of others, often publishing the names, home addresses, and
12 home telephone numbers of employees who have been targeted for "home visits." UCLA
13 PRIMATE FREEDOM maintains a frequently updated website on which it posts UCLA
14 employees' personal information, labeling the employees as "Targets" and urging others to harass
15 the employees and their family members.

16 28. While ALF has taken responsibility for raids on labs for decades, in recent years it
17 has shifted its tactics to directly targeting researchers and professors in universities to force them
18 out of their jobs. ALF's escalating attacks on UCLA employees reflect its coordinated and illegal
19 national campaign on academic researchers.

20 29. On November 14, 2004, ALF raided and later took credit for an attack on a lab at
21 the University of Iowa. More than 400 animals were stolen, and two labs and three offices were
22 broken into with their contents destroyed. Computers, lab devices, papers, and photos that were
23 both research-related and personal were destroyed by, among other means, acid and caustic
24 chemicals.

25 30. Shortly after this incident, as a "public safety measure" ALF listed the names,
26 addresses, and phone numbers of researchers at the Iowa lab, their spouses, and their students.
27 Professors subsequently received threats by phone.
28

1 31. On April 22, 2005, ALF raided a Louisiana State University research lab. Activists
2 took mice and mixed them in different cages and removed their identification plaques, smashed
3 windows and aquariums, spray painted and paint-stripped walls, and glued locks.

4 32. On January 5, 2007, ALF attacked and took credit for a "home visit" on a professor
5 at the University of Utah. Activists vandalized the professor's vacant home, putting glass-eating
6 acid on the windows and covering the house in slogans with paint. The follow-up communiqué
7 further threatened the professor by listing his other homes as potential targets.

8 33. On April 26, 2007, ALF made good on the threat against the University of Utah
9 professor and took credit for another attack on the professor's other home. Activists glued all the
10 locks on the doors to the house, spray painted slogans on the Jacuzzi, smashed out a front window,
11 and poured a salt solution to destroy the front lawn.

12 34. In July 2007, ALF vandalized an Oregon Health and Science University professor's
13 home. Activists poured chemicals on and spray painted his car, and spray painted the message
14 "ALF eyes on you!" onto his garage door. ALF followed up in a communiqué warning the
15 professor to "Look out behind you" and suggested fire bombs would be next.

16 35. On December 6, 2007, ALF struck again at Oregon Health and Science University.
17 This time, ALF vandalized the cars at the home of another researcher. Using paint stripper and
18 graffiti, the activists left the words "ALF" and "sadist" on the cars.

19 36. In recent months, similar activities have occurred at the homes of faculty members
20 of the Berkeley, San Francisco, Santa Cruz, and Santa Barbara campuses of the University of
21 California, suggesting that those employees of The REGENTS may be Defendants' next target.
22 Along with home demonstrations, there have been reports of prowlers in the backyards of
23 professors' homes late at night and vandalism of property. Outdoor faucets have been turned on in
24 a tactic reminiscent of the flooding of UCLA faculty member Edythe London's home.

25 37. The acts of terror and violence committed by ALF and ALB are not limited to
26 employees of The REGENTS and academics nationally. For example, from at least December
27 1999 through the present, ALF and ALB members have engaged in illegal tactics including
28 firebombing of cars, pepper spray assaults, vandalism, and battery against employees of

1 companies that engage in animal research, such as Huntington Life Sciences (HLS), Chiron
2 Corporation, Wachovia Bank, and other companies who invest in companies such as HLS.

3 **ALF Members and Defendants Herein Have Been Convicted of Numerous Crimes**
4 **and Enjoined By Courts Around the Country**

5 38. Several ALF activists and other animal rights terrorists recently have been jailed
6 for their crimes. For example, in December 2006, Donald Currie was jailed for 12 years and
7 placed on probation for life after being found guilty of planting homemade bombs on the
8 doorsteps of businessmen with links to HLS. In January 2006, the U.S. Department of Justice
9 announced charges against nine Americans and two Canadians who called themselves the
10 "Family," and engaged in direct action on ALF's behalf.

11 39. Based on these and other unlawful activities, a number of targeted organizations
12 and individual victims have obtained temporary restraining orders and preliminary and permanent
13 injunctions against ALF, related extremist groups, and/or affiliated individual defendants in courts
14 throughout the nation. *See, e.g., Huntingdon Life Sciences v. SHAC USA, et al.*, Superior Court of
15 the State of California, San Diego County Superior Court Case No. GIC812248 (JRH) (injunction
16 against individuals working in concert with extremist group); *Forest Laboratories, Inc. v. Animal*
17 *Liberation Front, et al.*, New York Supreme Court Case No. 006527/05 (DM) (injunction against
18 ALF); *Wachovia Corp., et al. v. Animal Liberation Front, et al.*, Santa Barbara County Superior
19 Court Case No. 1264894 (preliminary injunction entered against ALF and an individual working
20 in conjunction with ALF).

21 40. In 2006, POM Wonderful obtained a Temporary Restraining Order and Preliminary
22 Injunction against Defendants GREENE, RONEY, SABER and OLLIFF for their harassment of
23 the company's employees. The injunction became permanent on July 3, 2007.

24 41. In November 2007, Wachovia Bank obtained a Temporary Restraining Order
25 against Defendant KEVIN OLLIFF for his harassment of bank employees in Santa Barbara,
26 California. The court then issued a Preliminary Injunction against OLLIFF and his co-defendants
27 on January 29, 2008.

1 42. In December 2007, the Los Angeles County Superior Court issued a Temporary
2 Restraining Order against Defendant LINDA GREENE for her harassment of the ex-wife of a Los
3 Angeles City employee.

4 **ALF, ALB and UCLA PRIMATE FREEDOM Target REGENTS' Employees**

5 43. The campaign of harassment against UCLA researchers and their families at their
6 private residences began as early as the 1980s. In recent years, occurring in conjunction with
7 those protests was a series of underground events targeting faculty members and other researchers
8 at their homes. Faculty members and researchers were subject to harassing phone calls at home at
9 all hours of the day and night, threatening emails and letters, and home demonstrations often
10 conducted with noise-amplification devices that frightened children and harassed entire
11 neighborhoods.

12 44. This long running campaign has increased in intensity over the last two years. In or
13 about April 2006, demonstrators converged on UCLA faculty member Lynn Fairbanks' home in
14 Los Angeles while her two sons were at home. Defendants arrived around 11:00 p.m., banging
15 loudly on Fairbanks' front door while wearing ski masks.

16 45. On or about April 24, 2006, Defendants OLLIFF, SABER, GREENE and others
17 gathered in an area near the UCLA medical center. They carried graphic signs depicting mutilated
18 animals purportedly, but falsely, connected to research conducted at UCLA. Defendants OLLIFF,
19 SABER, GREENE and others led threatening chants designed to instill fear in employees and/or
20 students conducting animal research. They identified themselves as affiliated with ALF and the
21 violence conducted by that group, and repeatedly stated, "We know where you sleep at night."
22 During this protest, KEVIN OLLIFF hit a UCLA property officer with a sign. During the protest,
23 defendant GREENE boasted, "Animal rights activists are now the number one domestic terrorists
24 in the U.S. We must be doing something fucking right."

25 46. Defendants then turned their attention to Dario Ringach, a researcher at UCLA.
26 Ringach became a target of escalating threats and attacks by Defendants. UCLA PRIMATE
27 FREEDOM posted Ringach's home phone number and address on its website in approximately
28

1 August 2005. Shortly thereafter, Ringach received threatening phone calls at his home where the
2 female caller warned him to "Watch your back."

3 47. In or about January 2006, Ringach's laboratory assistant received a telephone call
4 from a Defendant who warned, "You just tell that fucking monkey killer to watch his back when
5 he's leaving the lab because I am going to fucking kill him."

6 48. Late in the evening of April 28, 2006, and four days after the threats made on the
7 UCLA campus, Defendants appeared at Ringach's home in Culver City, while he and his family
8 were home. Among the frightening chants intended to intimidate and harass Ringach and his
9 family were the following: "Animal killer," "We know where you live," and "We will never give
10 up." Defendants and others acting in concert with them wore masks to conceal their identities,
11 repeatedly banged on Ringach's front door, and entered his property to upend trash bins and
12 destroy personal property. The Ringach family, in fear for their safety, called the Culver City
13 Police and held the phone in the vicinity of the front door, which was repeatedly pounded and hit.
14 Concerned that Defendants would continue and escalate the attacks as promised, UCLA arranged
15 for private security officers to watch the home.

16 49. Defendants' campaign of harassment directed at Ringach and his family, including
17 his small children, continued throughout May, June and July 2006. Defendants repeatedly
18 terrorized the family in their own home by using tactics such as throwing firecrackers late at night
19 onto the family's property.

20 50. Defendants knew that the escalating threats to Ringach and his family would cause
21 great fear because of their firebomb attack on his colleague during this same period. On the
22 evening of June 30, 2006, Defendant affiliates of ALF planted a Molotov cocktail-type firebomb
23 on the doorstep of a neighbor of Fairbanks, though intended for Fairbanks. The firebomb device
24 was one similar to devices used in the past by ALF, ALB, and other extremist animal rights
25 organizations. The device failed to detonate.

26 51. On July 11, 2006, in an anonymous communiqué posted on
27 www.uclaprimateliberty.com and www.animalliberationpressoffice.org, ALF claimed
28 responsibility for the attempted firebombing. In doing so, ALF stated:

1 On the night of June 30, we paid a visit to Lynn Fairbanks home ... in Belaire.
2 Since she is rumored to have a cocktail every evening after a hard days work of
3 breeding monkeys for painful addiction experiments at UCLA we thought we
4 would give her a cocktail of our own a moletov cocktail. We left it on her doorstep
5 but didnt hang around to see if it went off....

6 ALF.

7 52. Days later, on July 15, 2006, Defendants and those acting in concert with them
8 converged on FAIRBANKS' home. Defendants GREENE, SABER and others used bullhorns to
9 shout obscenities and threats in front of Fairbanks' home. Defendants, including RAMIN SABER,
10 cited the recent attempted firebombing, urging the crowd to "Burn that fucker to the ground," and
11 warning, "You can't stop the ALF." Dismissing the presence of two police officers with the chant
12 "Forty activists, two cops," Defendants threatened, "What comes around goes around – burn that
13 fucker to the ground," causing Fairbanks and her family to fear for their safety.

14 53. Earlier during the evening of July 15, 2006, Defendants, including
15 KEVIN OLLIFF, RAMIN SABER, and LINDA GREENE, returned once again to the home of
16 Dario Ringach. A security guard was present at the Ringach home at the time and called the
17 Culver City Police Department. Following the guard's call to the police, Defendants and others
18 chanted, "Fifteen minutes, no cops...twenty minutes, no cops...a lot can happen in twenty
19 minutes." Defendants also chanted "Free the animals – ALF" and "We know where you sleep at
20 night." KEVIN OLLIFF yelled at the home, "What can happen in eleven minutes, Dario?"

21 54. Throughout the rest of the summer of 2006, UCLA researchers received hundreds
22 of threatening emails, phone calls, and home visits. The persons behind these emails and phone
23 calls asserted that the harassment would not stop until the employees ceased using animals in their
24 research.

25 55. Frightened for the safety of his family because of the attacks on his colleagues and
26 the threatening home visits, Dario Ringach ceased doing animal research in August 2006. On or
27 about August 4, 2006, Ringach sent an email to animal rights group containing the message,
28 "Effective immediately, I am no longer doing animal research. . . . Please don't bother my family

1 anymore." On or about August 7, 2006, The REGENTS issued a press release confirming
2 Ringach's decision to halt his primate research. On or about August 18, 2006, UCLA PRIMATE
3 FREEDOM updated its webpage to boast about Ringach's email.

4 56. In response to Ringach's decision to terminate his research program, The
5 REGENTS were forced to expend hundreds of thousands of dollars in retrofitting Ringach's
6 laboratory for a different research protocol.

7 57. The resignation of Ringach only resulted in the addition of new UCLA "Targets."
8 UCLA PRIMATE FREEDOM clarified this new approach by updating its webpage to include a
9 section entitled "Targets," which included Joaquin Fuster, professor emeritus at UCLA,
10 Nelson Freimer, a professor in residence in psychiatry and bio-behavioral sciences at UCLA,
11 Lynn Fairbanks, Roberto Peccei and Norman Abrams as of February 2007. The "Targets"
12 webpage included each professor's home address and phone number. On October 8, 2006,
13 Defendants assailed the homes of three employees of The REGENTS – Norman Abrams, then
14 UCLA's Acting Chancellor, Roberto Peccei, Vice Chancellor for Research at UCLA, and Nelson
15 Freimer, an employee whom Defendants believed was involved in animal research. While at
16 Abrams' home, Defendants used a bullhorn to scream epithets. After moving on from Abrams'
17 home, Defendants went to Peccei's home, wearing masks and shouting threats. Next, Defendants
18 and others made threatening and obscene chants at Freimer's home.

19 58. Defendants and others appeared on the UCLA campus on October 9, 2006.
20 Defendant LINDA GREENE led the group, using a bullhorn to shout, "Dario Ringach that coward
21 was a big brave boy in the lab torturing those animals, but a few pickets scared him off, we can
22 only hope you psychos go so easily." GREENE also exclaimed, "A few pickets at
23 Lynn Fairbanks' home and the bitch left town," and "We will never back down until the killing
24 stops." This last statement was repeated emphatically by the entire group, as were frequent chants
25 of "ALF."

26 59. On November 19, 2006, Defendants GREENE, SABER, and RONEY, along with
27 Pamelyn Ferdin and others, led threatening chants at Nelson Freimer's home that included "We
28 know where you sleep at night," and "We will never back down . . ." Later that evening,

1 Defendant TIM RUSMISEL made the statement, "You force us underground," while the group
2 was at the home of an individual associated with the company POM Wonderful, which had
3 previously obtained a restraining order to stop the harassment of its employees. Masked
4 Defendants also visited Peccei's home that day, where his wife was home alone.

5 60. On December 23, 2006, Defendants and others, including LINDA GREENE,
6 HILLARY RONEY, and RAMIN SABER, again converged on the homes of Peccei and Fuster,
7 where they shouted, "Free the animals – ALF" and, "No more compromise." One Defendant using
8 a bullhorn exclaimed, "Sometimes it's way worse than this."

9 61. On January 19, 2007, Defendants and others, including TIM RUSMISEL, LINDA
10 GREENE, and HILLARY RONEY demonstrated on the UCLA campus. RUSMISEL stated,
11 "Today you are lucky. You are receiving the fluffy-end . . ." and, "We are not always this
12 friendly." Defendants chanted, "Burn the fuckers to the ground," immediately followed by, "Visit
13 UCLA PRIMATE FREEDOM dot com," the website home to the "target" list of UCLA
14 employees and their residential addresses and phone numbers.

15 62. On February 14, 2007, Defendants GREENE, SABER and RONEY and others
16 blocked employees from entering buildings on the UCLA campus. Defendants banged on doors
17 and windows of a campus building. Defendants GREENE and RONEY pointed their fingers in a
18 "gun" position and repeatedly took "shots" at the research building where several employees'
19 offices are located. RONEY yelled, "Every move you make, we'll find out where you are and
20 always be there." Defendants, including TIM RUSMISEL, repeatedly cited "UCLA PRIMATE
21 FREEDOM dot com." That same day, UCLA PRIMATE FREEDOM's website was updated to
22 add new "Targets" – Roberto Peccei and Norman Abrams, accompanied by their home addresses
23 and telephone numbers.

24 63. On March 18, 2007, Defendants and others paid home visits to Fuster, Freimer,
25 Abrams, and Peter Anton, a newly identified "Target." Anton was named a "Target" on the UCLA
26 PRIMATE FREEDOM webpage on or about early 2007, and his Los Angeles home address and
27 telephone number were made publicly available on that website. Defendants and others began
28 their day at Fuster's home in Los Angeles. RONEY led chants, including, "We will continue to

1 come back and we will never back down . . . until you stop the killing." RONEY also chanted,
2 "We will be back again and again." GREENE was observed going up Fuster's driveway to the
3 gate that blocked Defendants and others from the front door. GREENE also used a megaphone to
4 shout insults at Fuster. Fuster evacuated his wife prior to the incident because, this time, he had
5 received prior warning. Fuster's wife has a heart condition that is aggravated by stress from the
6 Defendants' harassment. Next, at Freimer's Santa Monica home, Defendants and others distributed
7 flyers around the neighborhoods accusing employees of The REGENTS of committing violent
8 acts upon animals. GREENE shouted obscenities, including, "You fucking pervert, you sick
9 twisted fucking pervert." Defendants and others yelled, "The police don't know every aspect of
10 the movement, there is an aspect you don't know about and hopefully will never see. Send out the
11 email tomorrow, say 'I quit.'" Chants also included, "We know where you sleep at night" and
12 repeated references to ALF. Defendants and others then went to Abrams' home. Defendants
13 warned, "What goes around comes around, let's burn this fucker to the ground." Defendants
14 finished their day at Anton's home in Los Angeles. When they were unable to get into his secured
15 building, they left threatening telephone messages for him.

16 64. On Easter Sunday, April 8, 2007, protestors again targeted Freimer's home with
17 similar chants and threats as the previous attacks.

18 65. Then, on April 27, 2007, Defendants gathered for a "home visit" targeting both
19 Peccei and Fuster between 9:00 p.m. and 10:30 p.m. Neighbors of each employee reported that
20 the yelling frightened their children.

21 66. On the evening of May 6, 2007, a demonstrations occurred at the home of Nelson
22 Freimer and Roberto Peccei. Defendants and others wore masks and banged on Freimer's front
23 door as they yelled, "We're the ALF and we know who you are, we know where you are." At
24 Peccei's home, approximately a dozen masked Defendants arrived at Peccei's home, banging on
25 the front door inside the home's gated patio while yelling threats and obscenities, including "We
26 know where you sleep at night."

27 67. Again following through on their threats, Defendants resorted once more to a
28 firebomb attack. On June 24, 2007, Defendants placed a firebomb under the car of Arthur

1 Rosenbaum, which was parked in front of his home. Police were called to the scene and portions
2 of Rosenbaum's neighborhood were evacuated. Although Defendants had lit the fuse on the
3 firebomb, it failed to detonate prior to police intervention.

4 68. The ANIMAL LIBERATION BRIGADE, in an "anonymously" received
5 communiqué dated June 27, 2007, and posted on www.animalliberationpressoffice.org, took
6 responsibility for the attempted firebombing of Rosenbaum's car and issued additional threats:

7 130am on the twenty forth of june: 1 gallon of fuel was placed and set a light under
8 the right front corner of Arthur Rosenbaums large white shiney BMW. He and his
9 wife Sandy, ... are the target of rebellion...Rosenbaum, you need to watch your
10 back because next time you are in the operating room or walking to your office you
11 just might be facing injections into your eyes like the primates, you sick twisted
12 fuck. Demonstrators need to realize that just demonstrating won't stop this kind of
13 evil....

14 animal liberation brigade

15 69. Three days later, on June 30, 2007, Defendants RONEY, GREENE, and others
16 followed up at Rosenbaum's home. Defendants chanted Rosenbaum's home address as the target
17 of the demonstration. Defendants also yelled, "Hey Arthur, how's your BMW doing?" One
18 Defendant took pictures of the front of Rosenbaum's home and posted them on the internet.
19 Defendants then went to Abrams' home. GREENE led the chanting, citing the ALF and
20 exclaiming, "Animal killers leave town, primate killers leave town," and "We know where you
21 live and sleep at night." The group then arrived at Fuster's home, again citing the ALF and
22 warning, "We know where you sleep at night." Fuster again was forced to leave his residence in
23 order to remove his wife from an unsafe situation. Defendants and others next arrived at Freimer's
24 residence. After that protest ended, a picture of Freimer's car was the first picture posted on a
25 webpage devoted to photos of animal protest actions, suggesting Freimer's vehicle as the next
26 firebombing target.

1 70. On July 15, 2007, at 3:00 a.m., a Defendant attacked Peccei's home by banging on
2 his door and smearing dirt on windows. The Defendant shouted, "Roberto Peccei, you will never
3 be safe."

4 71. On July 21, 2007, at 7:43 p.m., Defendants again returned to Rosenbaum's home.
5 Demonstrators chanted, "For the animals we will fight, we know where you sleep at night."
6 RONEY and GREENE were present, but wore masks in an attempt to hide their identities and
7 intimidate Rosenbaum and his family.

8 72. On July 19, 2007, Defendants mailed a package containing razor blades, animal
9 fur, and oil to Rosenbaum's residence and addressed to his wife. The package told her to persuade
10 her husband to stop his animal research, or "What he does to the animals we will do to you." The
11 package was signed "ALF." On July 22, 2007, a communiqué from ALF claiming responsibility
12 for this package was posted on www.animalliberationpressoffice.org.

13 73. On July 29, 2007, in another anonymous communiqué posted on
14 www.animalliberationpressoffice.org, and linked to by UCLA PRIMATE FREEDOM's website,
15 additional threats were made against Rosenbaum regarding the razor blade-filled package sent to
16 his home:

17 An interesting package was mailed to the home of Arthur Rosenbaum Be
18 careful Arthur. **We are only just getting started. This action is a mere token when**
19 **compared to the other things that we can and will do.** Your address and your
20 phone numbers are out along with your dirty and disgusting secrets and you will be
21 feeling even more pressure. You have one choice. Stop vivisecting!

22 (Emphasis added).

23 74. On August 6, 2007, Rosenbaum received a postcard stating, "Hey I'm thinking of
24 you today, that's all I want to say. Except that I pray when you die, you are treated the same way
25 that animals are treated today."

26 75. On September 13, 2007, a neighbor of Rosenbaum observed individuals in a
27 Chrysler Avenger videotaping the front of Rosenbaum's house.

28

1 76. On September 16, 2007, Defendants and others converged on Rosenbaum's home.
2 Leaflets containing Rosenbaum's picture, home address and phone number were distributed
3 around the neighborhood. Defendant GREENE led chants, "Stop the murder, stop the death, free
4 the animals, ALF," and "Arthur Rosenbaum burn in hell..." Rosenbaum's name and home address
5 were also broadcast using a bullhorn.

6 77. On or about October 17, 2007, Defendants left three threatening voice mails at
7 Anton's home telephone number. One message said there was a bomb in his car. Another
8 message consisted of a person screaming into the phone. In a third message, the caller threatened,
9 "You keep torturing and abusing animals and we're gonna burn up all your shit. We can cause
10 more economic damage in one night than you can earn in a year. Fuck you asshole."

11 78. On or about October 20, 2007, Defendants trespassed onto a Beverly Hills
12 residential property they believed belonged to Edythe London, a professor in residence in
13 psychiatry and bio-behavioral sciences at UCLA, breaking a window and flooding the home with
14 a hose.

15 79. On October 26, 2007, ALF took credit for the London flooding, posting a
16 communiqué on www.animalliberationpressoffice.org and UCLA PRIMATE FREEDOM's
17 website and making additional threats:

18 ANIMAL LIBERATION FRONT STRIKES UCLA VIVISECTION

19 WATERFRONT PROPERTY IN BEVERLY HILLS FOR SALE!

20 Edythe London ... You are now in the spotlight of justice. Your address at ...

21 Shadybrook Drive in Beverly Hills is now publicized for all to see. Until we see the
22 end of primate vivisection at UCLA we will remind you of our presence. Push them
23 to stop Edythe or we keep pushing. We never back down. We always win.

24 Here's how we get started. We found your million dollar house in Beverly Hills on
25 the windy night of Saturday October 20, we discovered you weren't home so we
26 snuck around to your backyard. First we effectively clogged the intake drain of
27 your pool pump. It probably ran dry for a couple of hours and burned itself out. If it
28 didn't happen, wait for it. It will. Next we smashed a window and inserted your

1 garden hose, turned on to full blast of course. Bet you were surprized when you
2 came home. Edythe do you have flood insurance?

3 One more thing Edythe, water was our second choice, fire was our first. ...As you
4 slosh around your flooded house consider yourself fortunate this time.

5 We will not stop until UCLA discontinues its primate vivisection programe.

6 We are the ALF

7 (Emphasis added.)

8 80. On December 16, 2007, Defendants and others staged another demonstration at the
9 Beverly Hills property they believed belonged to Edythe London.

10 81. On December 22, 2007, Defendants and others staged another demonstration at
11 Rosenbaum's home and the property they believed belonged to Edythe London.

12 82. As a result of Defendants' actions, The REGENTS have been forced to hire security
13 guards and install security systems at several of the employees' homes in order to safeguard them.

14 83. In recognition of the growing threat ALF presents to individuals working in
15 universities, a January 3, 2008, posting encouraging and promoting illegal behavior at
16 www.animalliberationpressoffice.org stated as one of the "numerous successes" of 2007: "UCLA,
17 UCSD and OHSU vivisectors come under increased attack...(June, July, August, October,
18 November, December)."

19 84. On or about February 5, 2008, Defendants firebombed the Beverly Hills home they
20 believed belonged to Professor London. On February 6, 2008, the ALF Press Office posted a link
21 to a press release entitled "ALF Returns (as Promised) to ... Edythe London." This firebombing
22 caused extensive damage to the property.

23 **FIRST CAUSE OF ACTION**

24 **(Harassment-C.C.P. § 527.6)**

25 **(Against All Defendants)**

26 85. Plaintiff hereby incorporates the allegations in paragraphs 1 through 84 as if fully
27 set forth herein.

28

1 95. The REGENTS assert this cause of action on behalf of its employees and students
2 who are engaged in, oversee, or support those engaged in or overseeing animal research. These
3 individuals form a well-defined, easily identifiable group, and there is a well-defined community
4 of interest among the members of this group in being free from Defendants' intimidating and
5 harassing conduct.

6 96. No individualized proof of damages is required because Plaintiff seeks only
7 injunctive relief.

8 97. By the actions described above, Defendants have intentionally inflicted emotional
9 distress on The REGENTS' employees and students who are engaged in, oversee, or support those
10 engaged in or overseeing animal research, and Defendants threaten to continue intentionally
11 inflicting emotional distress on those individuals.

12 98. Defendants' intimidating and harassing conduct is extreme and outrageous and
13 would cause any reasonable person to suffer substantial emotional distress.

14 99. The REGENTS are informed and believe, and on that basis allege, that its
15 employees and students have suffered substantial emotional, mental, and physical distress
16 including, but not limited to, anxiety and sleeplessness, as a direct and proximate result of
17 Defendants' intimidating and harassing conduct.

18 100. Defendants, unless and until restrained, will continue to engage in conduct causing
19 substantial emotional distress to The REGENTS' employees and students who are engaged in,
20 oversee, or support those engaged in or overseeing animal research. Defendants' conduct has
21 caused, and will continue to cause, great and irreparable injury to those individuals.

22 101. Plaintiff has no adequate remedy at law. It is impossible to ascertain the amount of
23 compensation which, if Defendants are not restrained, would provide Plaintiff with adequate
24 relief.

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1 **THIRD CAUSE OF ACTION**

2 **(Violation of California Constitutional Right to Privacy)**

3 **(Against UCLA PRIMATE FREEDOM, ALF, ALB and DOES 1-100)**

4 102. Plaintiff hereby incorporates the allegations in paragraphs 1 through 84 as if fully
5 set forth herein.

6 103. The REGENTS assert this cause of action pursuant to Article I, Section I of the
7 California Constitution on behalf of its employees and students who are engaged in, oversee, or
8 support those engaged in or overseeing animal research. These individuals form a well-defined,
9 easily identifiable group, and there is a well-defined community of interest among the members of
10 this group in being free from Defendants' intimidating and harassing conduct.

11 104. No individualized proof of damages is required because Plaintiff seeks only
12 injunctive relief.

13 105. By the actions described above, Defendants have invaded the privacy interests of
14 The REGENTS' employees and students who are engaged in, oversee, or support those engaged in
15 or overseeing animal research.

16 106. The REGENTS' employees and students who are engaged in, oversee, or support
17 those engaged in or overseeing animal research have a reasonable expectation of privacy as to the
18 interests invaded.

19 107. The invasions of privacy suffered by The REGENTS' employees and students who
20 are engaged in, oversee, or support those engaged in or overseeing animal research are serious and
21 substantial.

22 108. The REGENTS are informed and believe, and on that basis allege, that these
23 serious and substantial invasions of privacy have caused its employees and students who are
24 engaged in, oversee, or support those engaged in or overseeing animal research to suffer injury,
25 damage, loss, and harm.

26 109. Defendants, unless and until restrained, will continue to invade the privacy interests
27 of The REGENTS' employees and students who are engaged in, oversee, or support those engaged
28

1 in or overseeing animal research. These invasions have caused, and similar invasions will cause,
2 great and irreparable injury to those individuals.

3 110. Plaintiff has no adequate remedies at law. It is impossible to ascertain the amount
4 of compensation which, if Defendants are not restrained, would provide Plaintiff adequate relief.

5 **FOURTH CAUSE OF ACTION**

6 **(Intrusion Into Private Affairs — Common Law)**

7 **(Against UCLA PRIMATE FREEDOM, ALF, ALB and DOES 1-100)**

8 111. Plaintiff hereby incorporates the allegations in paragraphs 1 through 84 as if fully
9 set forth herein.

10 112. The REGENTS assert this cause of action pursuant to Article I, Section I of the
11 California Constitution on behalf of its employees and students who are engaged in, oversee, or
12 support those engaged in or overseeing animal research. These individuals form a well-defined,
13 easily identifiable group, and there is a well-defined community of interest among the members of
14 this group in being free from Defendants' intimidating and harassing conduct.

15 113. No individualized proof of damages is required because Plaintiff seeks only
16 injunctive relief.

17 114. By the conduct described above, Defendants have intentionally intruded upon the
18 solitude and seclusion of The REGENTS' employees and students who are engaged in, oversee, or
19 support those engaged in or overseeing animal research.

20 115. These intrusions would be highly offensive to an ordinarily reasonable person.

21 116. The REGENTS are informed and believe, and on that basis allege, that its
22 employees and students who are engaged in, oversee, or support those engaged in or overseeing
23 animal research have suffered mental and emotional distress as a result of Defendants' intrusions
24 and that this distress is of a kind that normally results from such intrusions.

25 117. Defendants, unless and until restrained, will continue to intrude upon the solitude
26 and seclusion of The REGENTS' employees and students who are engaged in, oversee, or support
27 those engaged in or overseeing animal research. These intrusions have and will continue to cause
28 great and irreparable injury.

1 **SIXTH CAUSE OF ACTION**

2 **(Intentional Interference With Business Relations - Common Law)**

3 **(Against All Defendants)**

4 124. Plaintiff hereby incorporates the allegations in paragraphs 1 through 84 as if fully
5 set forth herein.

6 125. Plaintiff The REGENTS asserts this cause of action on its own behalf.

7 126. The REGENTS have a protected and valuable interest in its business relationships
8 with its employees and students. These relationships provide and will continue to provide
9 economic benefits to The REGENTS.

10 127. Defendants have specifically directed their unlawful acts of harassment and
11 intimidation against The REGENTS' employees and students.

12 128. Defendants' goal in harassing and intimidating The REGENTS' employees is to
13 disrupt the relationships between The REGENTS and its employees and students. These acts of
14 harassment directed at The REGENTS' employees and students are unlawful and serve no
15 legitimate purpose.

16 129. The REGENTS are informed and believe, and on that basis allege, that as a result
17 of Defendants' unlawful acts, The REGENTS' employees have suffered severe anxiety and
18 distress, negatively affecting the performance of their work-related duties, causing them to miss
19 days of work due to fear of harassment, and/or causing them to cease performing job duties related
20 to animal research.

21 130. As a result of Defendants' unlawful acts of harassment and intimidation, The
22 REGENTS have suffered great and irreparable injury. Unless Defendants are enjoined and
23 restrained, The REGENTS will continue to suffer great and irreparable injury.

24 131. The REGENTS have no adequate remedy at law. It is impossible to ascertain the
25 amount of compensation which, if Defendants are not restrained, would provide The REGENTS
26 adequate relief.

27 **PRAYER FOR RELIEF**

28 WHEREFORE, Plaintiff prays as follows:

1 1. That this Court issue preliminary and permanent injunctions restraining and
2 enjoining Defendants and their agents, employees, representatives, and all persons acting in
3 concert and participation with them or with actual notice of this order, during the pendency of this
4 action and permanently thereafter, from committing or furthering the commission of any and all of
5 the following acts:

6 (a) Committing any act of violence or making any threat of violence against
7 any person known or believed to be an employee or student of The REGENTS who conducts,
8 supports, or oversees animal research, or a family or household member who resides with such
9 individual;

10 (b) Vandalizing, damaging, or threatening to vandalize or damage real or
11 personal property belonging to The REGENTS, any person known or believed to be an employee
12 or student of The REGENTS who conducts, supports, or oversees animal research, or a family or
13 household member who resides with such individual;

14 (c) Harassing any person known or believed to be an employee or student of
15 The REGENTS who conducts, supports, or oversees animal research, or a family or household
16 member who resides with such individual, as defined in California Code of Civil Procedure
17 § 527.6;

18 (d) Picketing, demonstrating, or protesting within 50 feet of any home known
19 or believed to be that of an employee or student or a family or household member of any employee
20 or student of The REGENTS who conducts, supports, or oversees animal research;

21 (e) Picketing, demonstrating, or protesting within 150 feet of any home known
22 or believed to be that of an employee or student or a family or household member of any employee
23 or student of The REGENTS who conducts, supports, or oversees animal research between the
24 hours of 6:00 p.m. and 9:00 a.m.;

25 (f) Trespassing, entering, coming onto, or interfering with the use and
26 enjoyment of any real property (including residential property) owned, occupied, or in the
27 possession of any person known or believed to be an employee or student of The REGENTS who
28 conducts, supports, or oversees animal research;

1 (g) Violating Los Angeles Muni Code Ch. 4, Art. I § 41.57, Ch. 9, Art. 5
2 § 115.02; Santa Monica Muni Code, Ch. 4 §§ 4.08.630-640, 4.12.040-060; Culver City Muni
3 Code, Title 9, §§ 9.07.020, 9.07.055; Beverly Hills Muni Code, Title 5, Ch. 1, Art. 2 § 5-1-205; or
4 any other similar city or municipal regulation regarding noise;

5 (h) Screaming, shouting, yelling, amplifying sounds with electronic equipment,
6 or otherwise causing or creating any loud, disturbing, or annoying noise within 100 feet of a home
7 known or believed to be that of an employee or student or a family or household member of any
8 employee or student of The REGENTS who conducts, supports, or oversees animal research;

9 (i) Placing or maintaining upon any website or otherwise disseminating any
10 private or personal information, including home addresses, home phone numbers, mobile phone
11 numbers, email addresses or vehicle license plate numbers, regarding any individual known or
12 believed to be an employee or student of The REGENTS who conducts, supports, or oversees
13 animal research, or a family or household member who resides with such employee or student;

14 2. That this Court issue a temporary restraining order, as well as preliminary and
15 permanent injunctions, ordering Defendants and their agents, employees, representatives, and all
16 persons acting in concert and participation with them or with actual notice of this order, during the
17 pendency of this action and permanently thereafter to:

18 (a) Post on all websites owned, operated, or controlled by any of the
19 Defendants the following language: "Notice: The Superior Court of California has issued an order
20 prohibiting certain activity relating to The Regents of the University of California and their
21 employees" in the manner set forth below;

22 (b) Post the foregoing statement as a continuously visible underlined hyperlink
23 which, when clicked, displays only a legible, complete, and unmodified copy of all pages of the
24 Temporary Restraining Order, excluding the names of Plaintiff's attorneys; and

25 (c) Post the foregoing hyperlink on the home page of any website owned or
26 operated by any Defendant or any of its affiliated entities in a typeface and color that is consistent
27 with the most prominent reference to UCLA, The Regents of the University of California, or any
28 employee or student of The REGENTS on each such page, and in a manner whereby the hyperlink

1 is proximately located to the most prominent reference to UCLA, The Regents of the University of
2 California, or any employee or student of The REGENTS on the page, such that the hyperlink
3 would ordinarily be displayed to a user viewing the page.

4 3. That this Court enter an order that no person who has notice of the relief granted by
5 the Court shall fail to comply with its letter and spirit nor shall any person subvert the letter or
6 spirit by any sham, indirection, or other artifice.

7 4. That this Court order that failure to comply with the terms of the temporary
8 restraining order or the preliminary or permanent injunctions described above by any Defendant or
9 other person with actual notice of their provisions, be subject to sanctions in the amount of \$1,000
10 per day, such amount to be doubled each successive time that any such Defendant or person
11 continues to violate the Court's order; and that each Defendant found in violation of such
12 infraction be held jointly and severally liable for all attorneys' fees and related costs incurred by
13 Plaintiff in relation to the enforcement of the provisions of such restraining order or injunction.

14 5. That this Court award Plaintiff its attorneys' fees and costs of suit.

15 6. That this Court order such other and further relief as the Court deems just and
16 proper.

17 Dated: February 20, 2008

IRELL & MANELLA LLP

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20 By: John C. Hueston
21 John C. Hueston
22 Attorneys for Plaintiff
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