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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **COUNTY OF LOS ANGELES**

12 **BC 680035**

13 ANGELA WHITE (aka BLAC CHYNA),

14 Plaintiff.

15 v.

16 ROBERT KARDASHIAN (aka ROB
17 KARDASHIAN); KRIS JENNER;
18 KIMBERLY KARDASHIAN (aka KIM
19 KARDASHIAN or KIM KARDASHIAN
20 WEST); KHLOE KARDASHIAN;
21 KOURTNEY KARDASHIAN; KENDALL
22 JENNER; KYLIE JENNER; DOES 1-100,

23 Defendants.

Case No:

COMPLAINT FOR:

1. ASSAULT;
2. BATTERY;
3. DISTRIBUTION OF PRIVATE MATERIALS (Civil Code §1708.85);
4. DOMESTIC VIOLENCE (Civil Code §1708.6);
5. HARASSMENT (CCP§ 527.6);
6. INTRUSION INTO PRIVATE AFFAIRS;
7. FALSE LIGHT;
8. DISCLOSURE OF PRIVATE FACTS;
9. DEFAMATION (LIBEL);
10. INTERFERENCE WITH CONTRACTUAL RELATIONS;
11. INTERFERENCE PROSPECTIVE ECONOMIC RELATIONS.

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Superior Court Of California
County Of Los Angeles

OCT 17 2017

Sherri H. Carter, Executive Officer/Clerk
By: Marlon Gomez, Deputy

1 Plaintiff ANGELA WHITE (aka BLAC CHYNA), by and through undersigned counsel
2 The Bloom Firm, brings this Complaint against Defendants ROBERT KARDASHIAN (aka
3 ROB KARDASHIAN), KRIS JENNER, KIMBERLY KARDASHIAN (aka KIM
4 KARDASHIAN or KIM KARDASHIAN WEST), KHLOE KARDASHIAN, KOURTNEY
5 KARDASHIAN, KENDALL JENNER, KYLIE JENNER, and DOES 1-100, and hereby
6 alleges as follows:

7 INTRODUCTION

8 1. Rob Kardashian is an abuser intent on destroying Angela White, the mother of
9 his baby, who left him in 2016. In revenge, the Kardashian-Jenner family became media
10 predators, slut-shaming her on social media and killing her hit television show, which had
11 already begun filming a second season.

12 2. After Ms. White obtained July 2017 court orders finding that Rob Kardashian's
13 revenge porn rant was a form of domestic abuse, and knowing that Ms. White was intent on
14 standing up for her rights, Rob Kardashian and Kylie Jenner hastily filed this lawsuit, which
15 attempts to shame her for: (i) having worked in the past as a stripper, a legal profession peopled
16 by actual human beings as deserving of respect as their famous sisters, who perform in sex
17 tapes and pose naked; (ii) having his baby—little Dream, who Ms. White could not possibly
18 love more and who Ms. White, despite her many powers, did not conceive by herself; (iii)
19 damaging a gingerbread house—*really: a gingerbread house*; and (iv) most of all, having the
20 courage to leave him, a Kardashian, when she could no longer tolerate his harassment.

21 3. The unwritten rule no one told Ms. White when she embarked on a relationship
22 with Mr. Kardashian is: the entire family¹ takes it personally if you leave and will come after
23 you, using their fame, wealth and power to take you down. They will get your television show
24 cancelled. They will go after your endorsement deals. They will condone slut-shaming of
25 you.² They will spread lies about you. They will claim you are a bad mother, without

26 ¹ Except Caitlyn Jenner, who had the decency to publicly admit, on an episode of “The View”
27 on July 14, 2017, that Rob Kardashian had a problem and mistreated Ms. White.

28 ² “Slut shaming” is an attempt to humiliate the victim, almost always female, by suggesting that
she has low morals and is disgusting and unworthy. (Cyberbullying Research Center, *Revenge*

evidence. They will even fund a lawsuit about crumbled cookies to get revenge on you for leaving a Kardashian.

4. Rob Kardashian and his powerful, vindictive family have done enough damage to Ms. White’s career and professional reputation, which she singlehandedly built from scratch—without the help of a famous last name. This lawsuit seeks to hold them accountable.

PARTIES

5. Plaintiff ANGELA WHITE (aka BLAC CHYNA) (hereinafter “Ms. White”) is a California citizen, who currently resides in Los Angeles, California. Ms. White is an actress, reality television personality, business owner, model, and social media influencer. In addition to being a mother, starring in music videos and modeling for magazines, Ms. White owns an eyelash and beauty salon in Encino, California called Lashed and a beauty product line by the same name. Ms. White also owns 88 Fin, a women’s clothing line she established in 2013.

6. Defendant ROBERT KARDASHIAN, JR. (aka ROB KARDASHIAN) (hereinafter “Rob Kardashian”) is a California citizen, who currently resides and does business in Los Angeles, California. He is best known for appearing on “Keeping Up with the Kardashians,” his family’s hit reality television show on the E! network.

7. Defendant KRIS JENNER is Rob Kardashian’s mother and manager. Defendant Kris Jenner is a California citizen, who currently resides, owns property, and does business in Los Angeles. Defendant Kris Jenner is best known for starring along with her family on “Keeping Up with the Kardashians.” She also owns and operates Jenner Communications, which is located in Los Angeles.

8. Defendant KIMBERLY KARDASHIAN (aka KIM KARDASHIAN or KIM KARDASHIAN WEST) (hereinafter “Kim Kardashian”) is Rob Kardashian’s sister. Defendant Kim Kardashian is an individual, who is a California citizen, who currently resides, owns property, and does business in Los Angeles. Defendant Kim Kardashian is a reality television

Porn Research, Laws, and Help for Victims (July 14, 2016) <<http://cyberbullying.org/revenge-porn-research-laws-help-victims>> as of July 9, 2017.)

1 personality, socialite, actress, businesswoman, and model. She is best known for starring along
2 with her family on the E! network's "Keeping Up with the Kardashians."

3 9. Defendant KHLOE KARDASHIAN is also Rob Kardashian's sister. Defendant
4 Khloe Kardashian is an individual, who is a California citizen and currently resides, owns
5 property, and does business in Los Angeles. Defendant Khloe Kardashian is a reality television
6 personality, socialite, model, and businesswoman, who is best known for starring along with
7 her family on the E! network's "Keeping Up with the Kardashians."

8 10. Defendant KOURTNEY KARDASHIAN is Rob Kardashian's oldest sister.
9 Defendant Kourtney Kardashian is a California citizen, who currently resides, owns property,
10 and does business in Los Angeles, California. Defendant Kourtney Kardashian is a reality
11 television personality, socialite, businesswoman, and model, who is best known for starring
12 along with her family on the E! network's "Keeping Up with the Kardashians."

13 11. Defendant KENDALL JENNER is Rob Kardashian's younger half-sister.
14 Defendant Kendall Jenner is a California citizen, who currently resides, owns property, and
15 does business in Los Angeles, California. Defendant Kendall Jenner is a reality television
16 personality, socialite, businesswoman, and model, who is best known for starring along with
17 her family on the E! network's "Keeping Up with the Kardashians."

18 12. Defendant KYLIE JENNER is Rob Kardashian's younger half-sister. Defendant
19 Kylie Jenner is a California citizen, who currently resides, owns property, and does business in
20 Los Angeles, California. Defendant Kendall Jenner is a reality television personality, socialite,
21 businesswoman, and model, who is best known for starring along with her family on the E!
22 network's "Keeping Up with the Kardashians."

23 **JURISDICTION AND VENUE**

24 13. This Court has personal jurisdiction over Defendants Rob Kardashian, Kris
25 Jenner, Kim Kardashian, Khloe Kardashian, Kourtney Kardashian, Kendall Jenner, and Kylie
26 Jenner because each of the Defendants reside, do business, and/or own property in the State of
27 California.

1 14. Venue is proper in Los Angeles County because Defendants reside and do
2 business in this county, and the events, conduct, and injuries alleged herein occurred in this
3 county.

4 **STATEMENT OF FACTS**

5 **I. BLAC CHYNA: A PUBLIC PERSONA**

6 15. Angela White is and has always been an independent self-sufficient woman.
7 Unlike Rob Kardashian, Ms. White comes from working-class background, does not have a
8 wealthy family to rely on and has always worked for a living.

9 16. In fact, Ms. White first began working when she was sixteen-years-old. When
10 turned eighteen, Ms. White began performing as an exotic dancer to save money for college.
11 Two years later, Ms. White moved to Miami to attend Johnson and Wales University, where
12 she took classes during the day and performed at the King of Diamonds strip club at night.

13 17. From there, her modeling career took off and in 2011 Ms. White was deemed
14 “model of the year” at the Urban Model Awards. It was also around this time that Ms. White
15 began featuring in music videos and getting her name mentioned in songs by hit makers such as
16 Kanye West, Nicki Minaj and Drake.

17 18. In 2013, Ms. White graduated from JLS Professional Makeup Artist School.
18 Later that year, Ms. White launched her clothing line, 88 Fin, and her cosmetic line, LASHED
19 by Blac Chyna. In 2014, Ms. White opened her LASHED Beauty Bar salon, which offers
20 various beauty services and makeup lessons.

21 19. Ms. White created the public persona “Blac Chyna” and has been successful in
22 her *own* right as an entertainer, social media influencer, and entrepreneur—*long* before she met
23 Rob Kardashian.

24 **II. RELATIONSHIP WITH ROB**

25 20. Ms. White embarked on a romantic relationship with Rob Kardashian in or
26 around January 2016. Shortly thereafter, their relationship became the target of tabloid media
27 fodder.

21. Despite the fact that Ms. White and Rob’s older sister, Defendant Kim Kardashian were once close friends, Rob’s famous family instantly disapproved of the new relationship.

22. In or around April 2016, the couple became engaged and shortly thereafter announced Ms. White was pregnant with their first child in May 2016.

23. On November 10, 2016, the couple welcomed their daughter Dream Renée Kardashian to the world.

24. In or around December 2016, Ms. White split from Rob Kardashian because of his abuse and she and her children (she has a son, King, from a prior relationship) moved out of the Calabasas home she briefly shared with Rob Kardashian.³

25. On or around December 17, 2016, Rob Kardashian took to the social media application Snapchat to confirm their break-up to the world and said, “Chyna left me.”

III. DECEMBER 2016 SOCIAL MEDIA HACKING

26. Rob Kardashian has stolen Ms. White’s phone in the past. In fact, in December 2016 Rob Kardashian took it one step further and hacked into Ms. White’s Instagram account to publicly shame her in retaliation for leaving him.

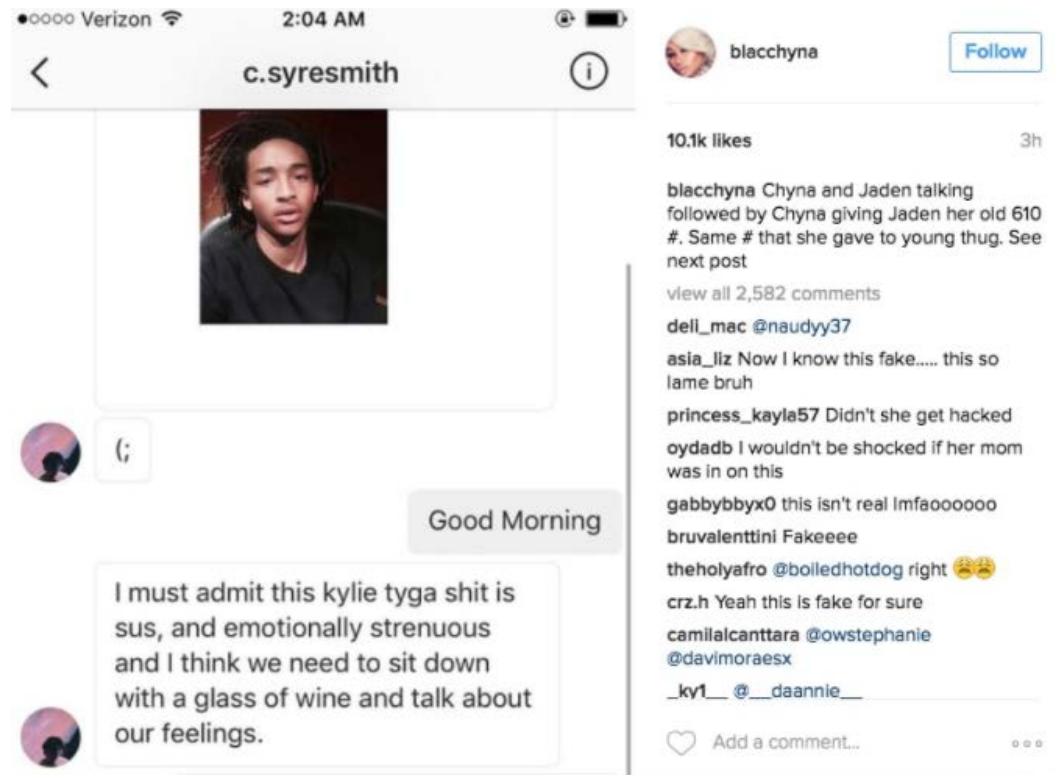
27. During their relationship, Rob Kardashian was often jealous and insecure so he would regularly go through Ms. White’s phone to see who she was contacting and what she was saying to them.

28. Specifically, in or around December 2016, Rob Kardashian stole Ms. White’s phone and impersonated Ms. White on her own Instagram page.

29. While impersonating Ms. White on her Instagram page, Rob Kardashian made it seem like she was cheating on him by posting fake conversations with other famous men and made it seem as though Ms. White was speaking negatively about Defendant.

³ At the time of their break-up Ms. White and Rob Kardashian were living in a home owned by his youngest sister, Defendant Kylie Jenner.

30. In one his many posts from Ms. White's account, Mr. Kardashian posted a screen shot of a private conversation between Ms. White and her friend Jayden Smith with a caption that read, "Chyna and Jayden talking followed by Chyna giving Jayden her old 610 #."



31. In another post, Rob Kardashian posted an old photo of Ms. White and said, "Next I am going to post my messages with my best friend Treasure talking about my plans with Rob."



32. He then posted a series of text messages between Ms. White and her friend Treasure, in which Ms. White appears to describe Rob Kardashian as “lazy,” “fat” and “insecure.”



33. Ms. White eventually changed her Instagram handle so that she could respond to Rob's online attack on her own Instagram account. In her response, Ms. White said: "I'M DONE ! This entire year I have done nothing but help Rob! It's so SAD & PATHETIC how low he'd stoop to cover up HIS PERSONAL ISSUES! Rob is mentally ill & refuses to seek help! He self medicates which makes it worse. I have done nothing but help & love him from the beginning! It's Chy here I got my own!!! I was doing swell before I got with him!" Ms. White even detailed some of the abuse Rob had forced her to endure during their relationship by saying, "He stressed me out my ENTIRE PREGNANCY!!! Accusing me of cheating, going crazy on me with massive text blast daily! being an absolute lunatic & then covering it up with gifts! I was verbally abused every other day."



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IV. DOMESTIC VIOLENCE ON APRIL 8, 2017

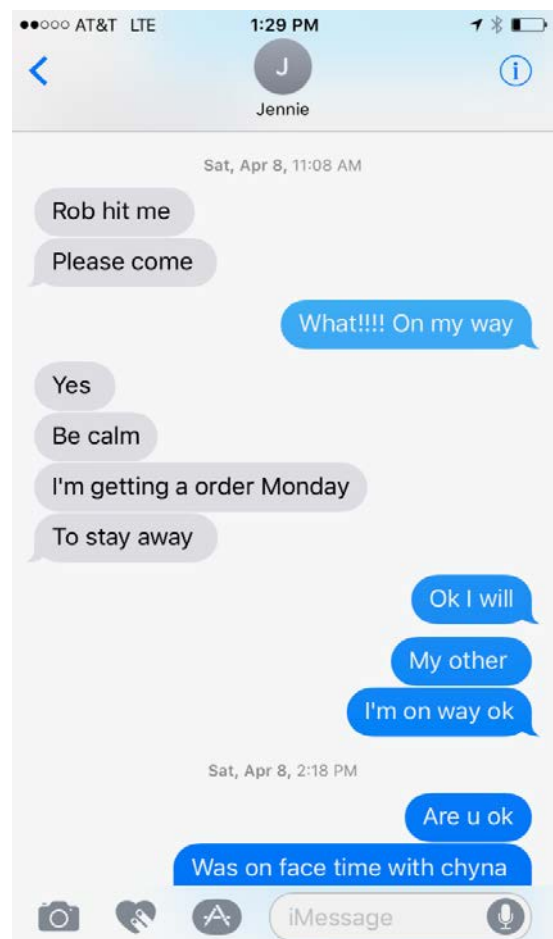
34. Rob Kardashian has not only been verbally abusive but he has also been physically violent with Ms. White in the past—even after their December 2016 break-up.

35. On or around April 8, 2017, Rob Kardashian was angry with Ms. White and was speaking poorly about her in front of Ms. White's 4-year-old son, King. When Ms. White told Defendant Rob Kardashian that he could not speak about her this way in front of her young son, he exclaimed, "I can say whatever the fuck I want!"

36. Ms. White then used her phone to call King's father, Tyga when Rob Kardashian immediately grabbed the phone from her hand and violently knocked her to the ground where she landed on her hands and knees.

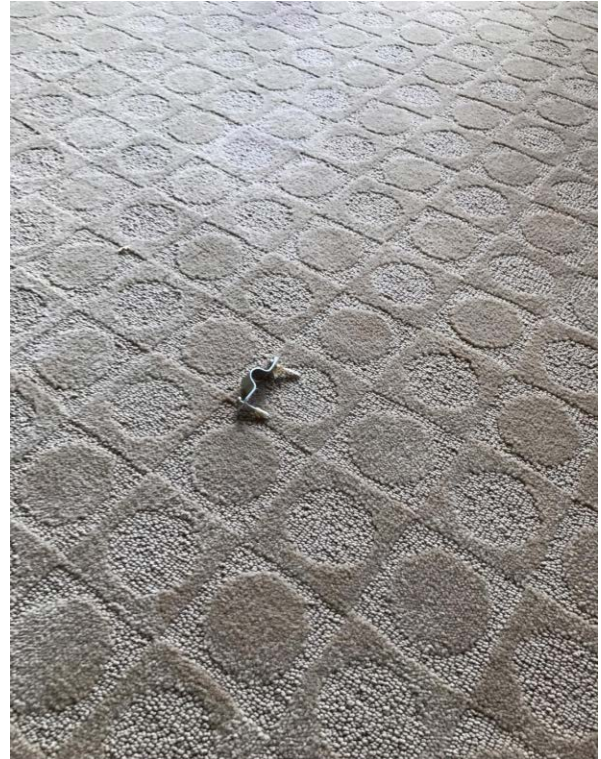
37. Rob Kardashian is large man of 6'2" and weighs 280 pounds whereas Ms. White is a petite woman of only 5'2". Accordingly, Rob Kardashian easily knocked Ms. White to the ground in just one fell swoop.

38. Ms. White was terrified and injured as a result of Rob Kardashian knocking her to the ground. As a result, Ms. White texted King's nanny and said, "Rob hit me. Come quick." Ms. White's 4-year-old son witnessed Defendant violently knock his mother to the ground.



1 39. After the nanny came and removed King from the violent situation, Ms. White
2 asked to borrow the nanny's phone so that she could document Rob Kardashian's abuse as he
3 had confiscated Ms. White's phone.

4 40. With the nanny's phone in hand, Ms. White ran to the bedroom and immediately
5 locked her door. However, Rob Kardashian lost all control and tore the hinges off of Ms.
6 White's bedroom door. Ms. White then retreated to the bathroom, hid in the bathroom closet,
7 and locked the door.



20 41. Rob Kardashian then followed Ms. White through the bedroom to the bathroom.
21 It was then that Ms. White began to record Defendant's abuse by peering around the closet door
22 and through the glass in the bathroom door. Ms. White hid in the closet out of fear that he
23 would break the glass bathroom door. In recording Rob Kardashian through the closet door she
24 cracked open, a shirtless Rob Kardashian can be heard yelling, "Do you want your phone?!"
25 You can record me all you want, I don't care!" (See Exhibit 1)

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1 42. Rob Kardashian then went through Ms. White’s bedroom closet, ransacked it,
2 and threw her belongings into total disarray.



19 43. Rob Kardashian’s domestic abuse of Ms. White on or around April 7, 2017 was
20 a truly terrifying experience for Ms. White.

21 44. Ms. White suffered pain and difficulty walking for days following the domestic
22 dispute as a result of Rob Kardashian violently knocking her to the ground.

23 **V. ROB’S CONSTANT HARASSMENT**

24 45. Rob Kardashian has a long history of harassing Ms. White by text, email, phone,
25 and social media dating back to June 2016—during their engagement when Ms. White was
26 pregnant with their daughter.

27 46. In or around June 2016, Ms. White called her ex fiancé Tyga to discuss a matter
28 regarding their son King. Upon learning that his pregnant fiancé called her son’s father, Rob

1 Kardashian grew intensely jealous and accused Ms. White of cheating on him with Tyga. At
2 the time, Tyga was dating Rob’s sister Kylie and Ms. White no longer had romantic feelings for
3 her him. Ms. White loved Rob and was focused on growing her family with him. However,
4 Rob never believed her and continued to accuse her of wanting to reconcile with Tyga even
5 during his July 5, 2017 social media rant.

6 47. Ms. White first started telling Rob Kardashian to seek the help of a professional
7 therapist in or around June 2016. However, at no point during their romantic relationship, did
8 Rob Kardashian seek the help of a professional therapist.⁴

9 48. Despite the fact that Ms. White split from Rob Kardashian in or around
10 December 2016, Defendant continued to relentlessly harass Ms. White by text, email, phone,
11 and social media.

12 49. Rob Kardashian sent the following abusive text messages in May 2017—months
13 after the couple broke-up.

14 50. During Rob Kardashian’s harassing text messages, he said, “U wanted Dream to
15 get back at [Tyga] well u can have her. I’m gone for life.” In the same text message,
16 Defendant repeatedly harassed Ms. White because her ex fiancé simply liked one of her photos
17 on social media.

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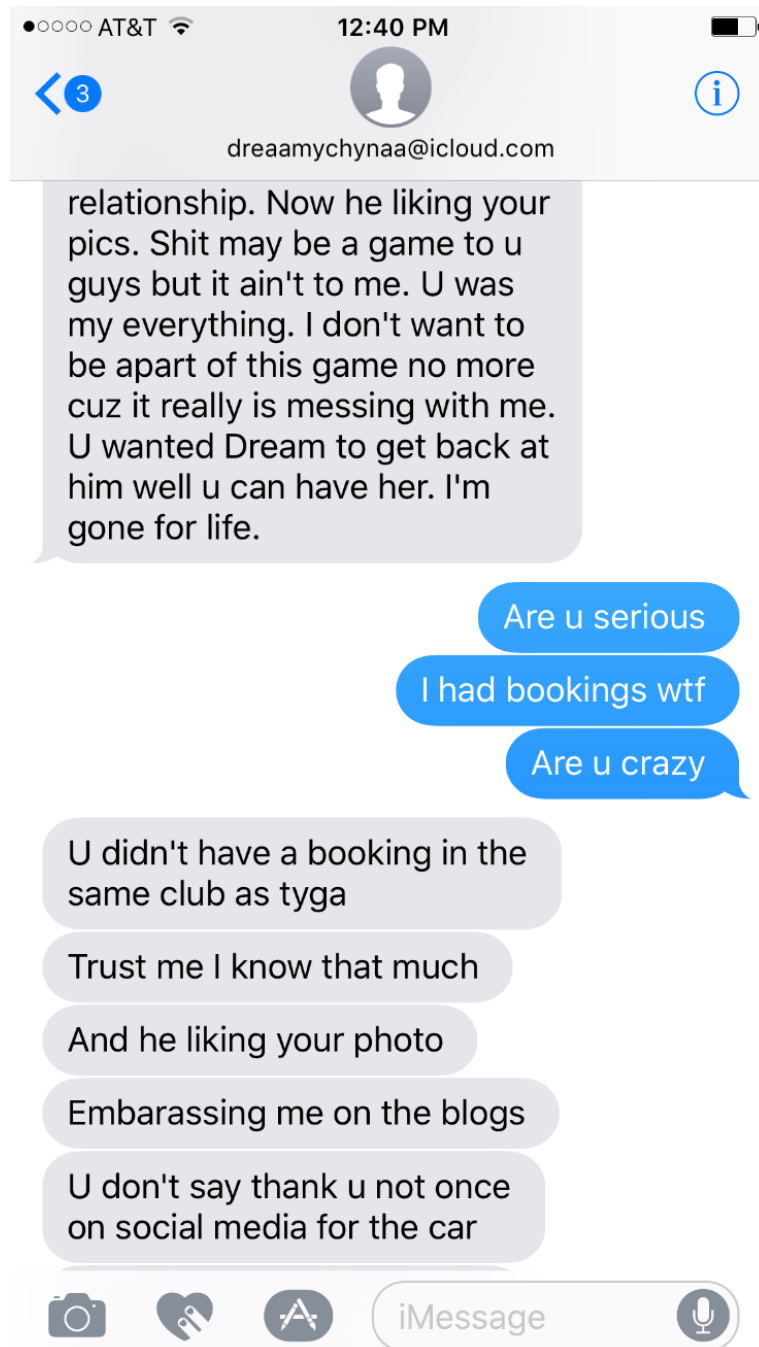
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26 ⁴ In or around February 2017, Ms. White met daily with Jamel Davenport, who was supposed to
27 be Rob’s life coach as documented on episodes of his family’s show “Keeping Up with the
28 Kardashians.” While Ms. White worked on various exercises with Mr. Davenport, Rob
Kardashian regularly cancelled appointments and ultimately failed to accept Mr. Davenport’s
help.



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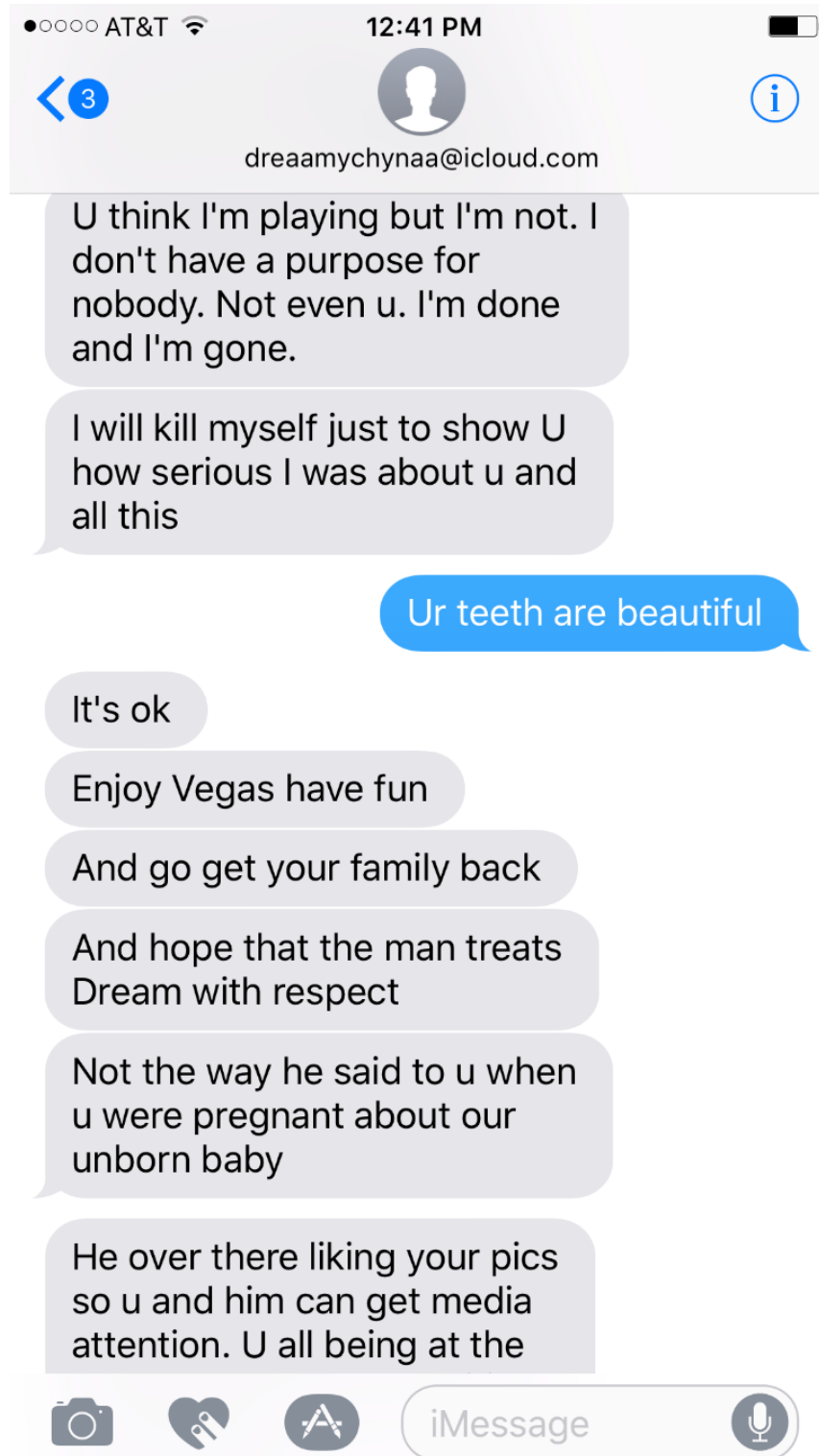
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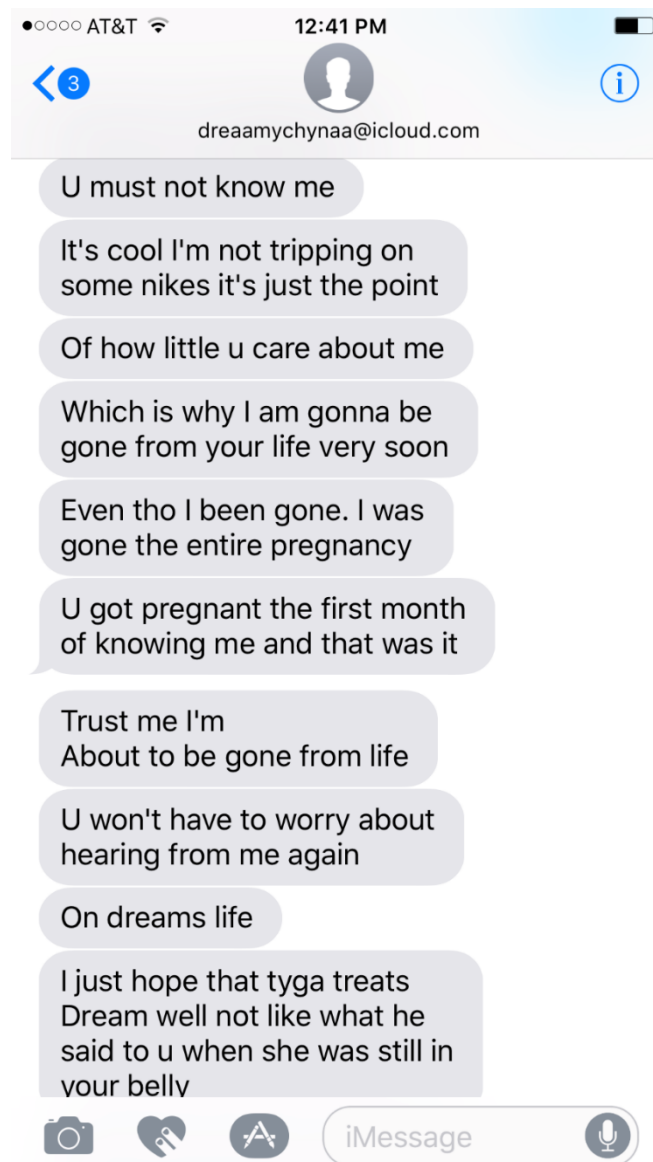
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51. It was not uncommon for Rob Kardashian to threaten to kill himself in a sick attempt to manipulate her. In another text message, Rob Kardashian said, “U think I’m playing but I’m not. I don’t have a purpose for nobody. Not even u. I’m done and I’m gone.”

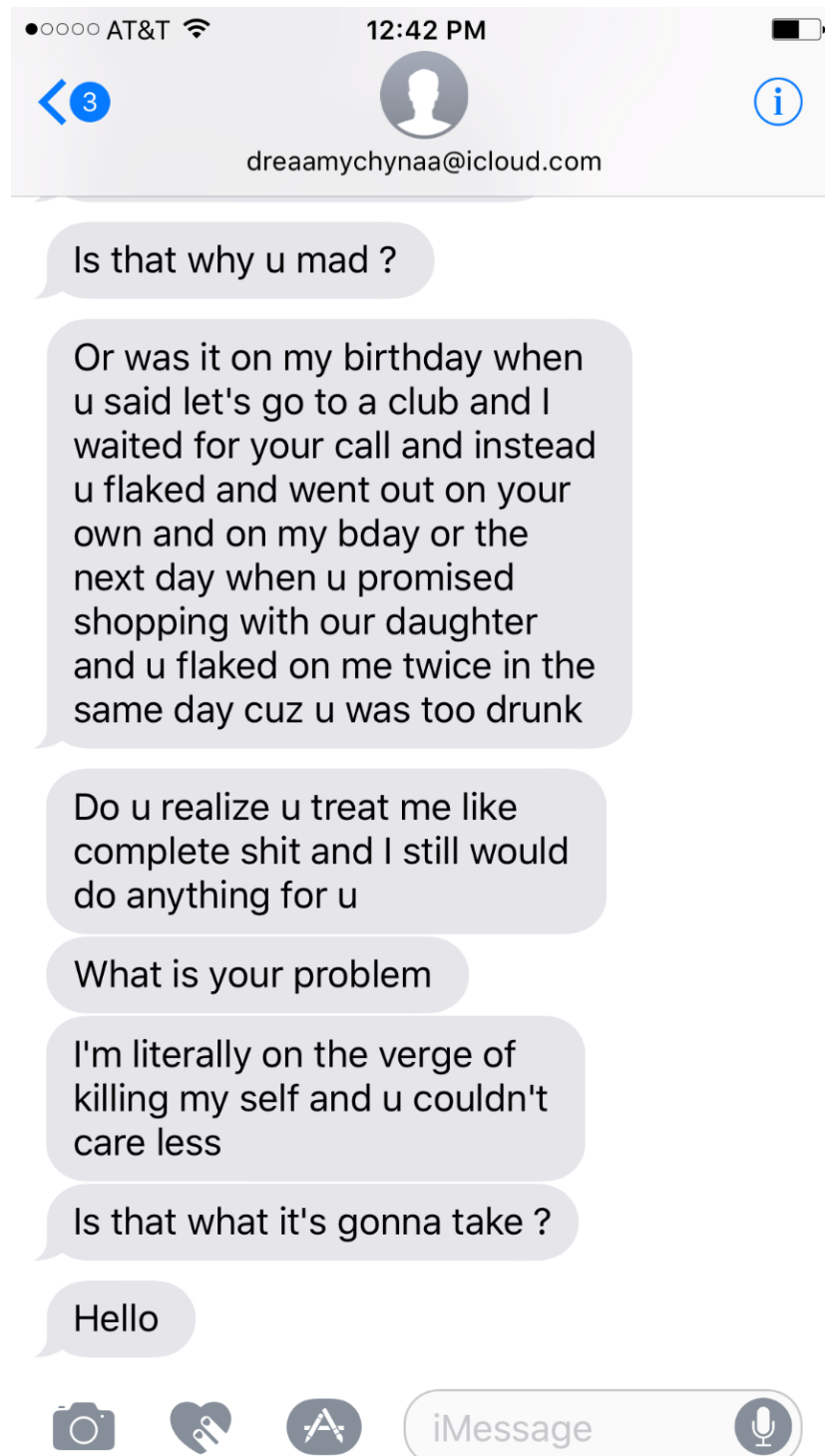


52. In another harassing text, Rob said, “So don’t worry I’m gone for good . . . On dreams life . . . I’ll be dead and u won’t get a single text from me again . . .” In response, Ms. White merely said, “Stop boy” as she typically kept her responses few and far between so as not to provoke further harassment from Rob Kardashian.

53. Rob Kardashian again threatened to take his own life when talking about a pair of Nikes Ms. White gifted to him on his birthday and said, “It’s cool I’m not tripping on some nikes it’s just the point . . . Of how little u care about me . . . Which is why I am gonna be gone from your life very soon.” Rob Kardashian even doubled down on his threat in the same text thread and said, “Trust me I’m about to be gone from life.”



1 54. Another time Rob Kardashian texted Ms. White asking why she was mad at him.
2 Rob texted, “Do u realize u treat me like complete shit and I still would do anything for u . . .
3 What is your problem . . . I’m literally on the verge of killing myself and u couldn’t care less . .
4 . Is that what it’s gonna take?”

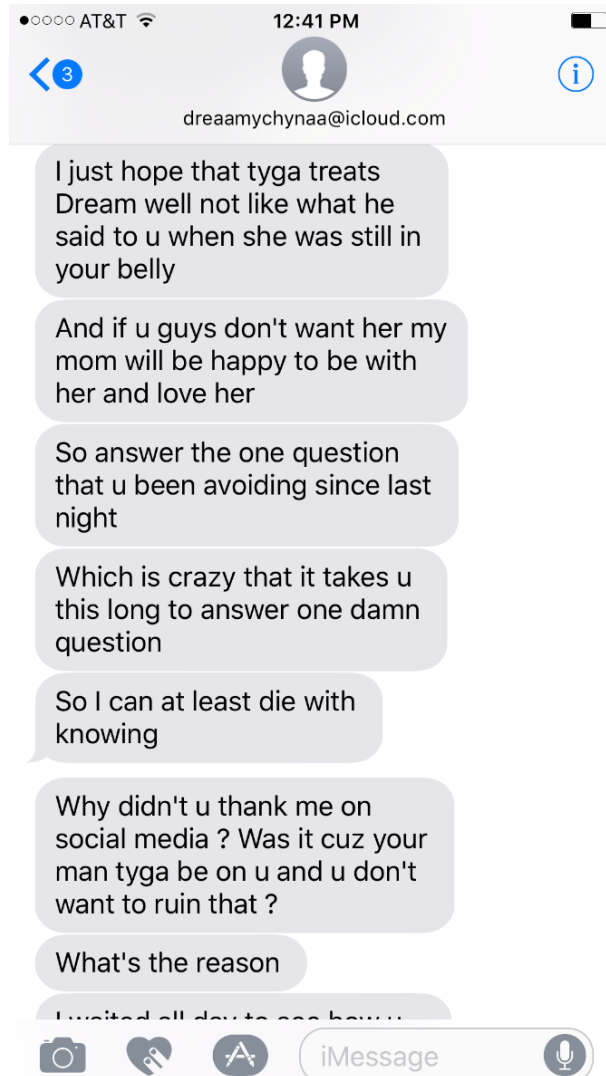


1 55. Rob Kardashian would even continue to harass Ms. White even when she did not
2 respond to his text messages. In one text, as if egging her on, Rob said, “Hate how u treat me
3 like shit . . . So that’s why u won’t say anything . . . R u too wasted to text? Is that why your
4 mad?”

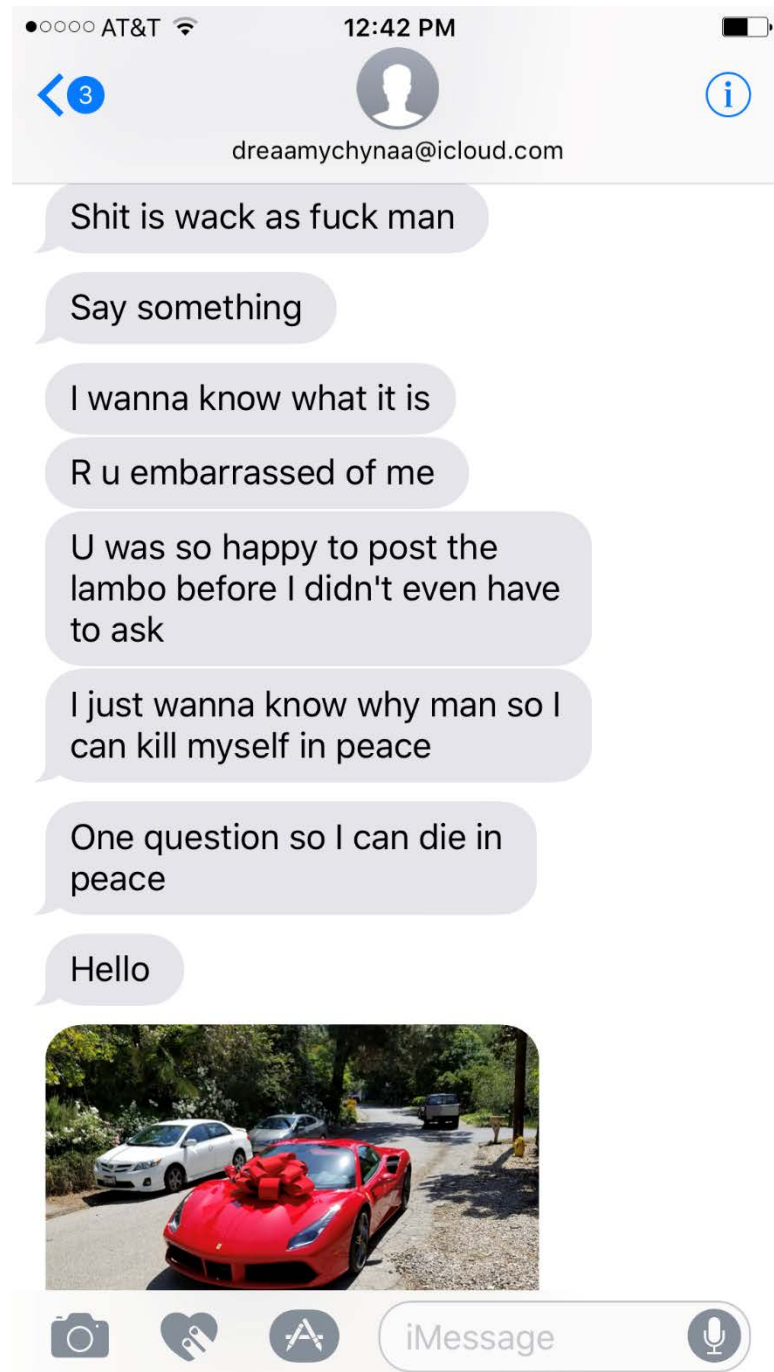


1 56. In another texting rant, Rob Kardashian said, “What’s your problem? Nobody
2 coming at u at all. In fact u forgot to send me a pic once again after I said how pretty u looked.
3 Why r u like this everyday . . .” Ms. White remained silent and did not respond.

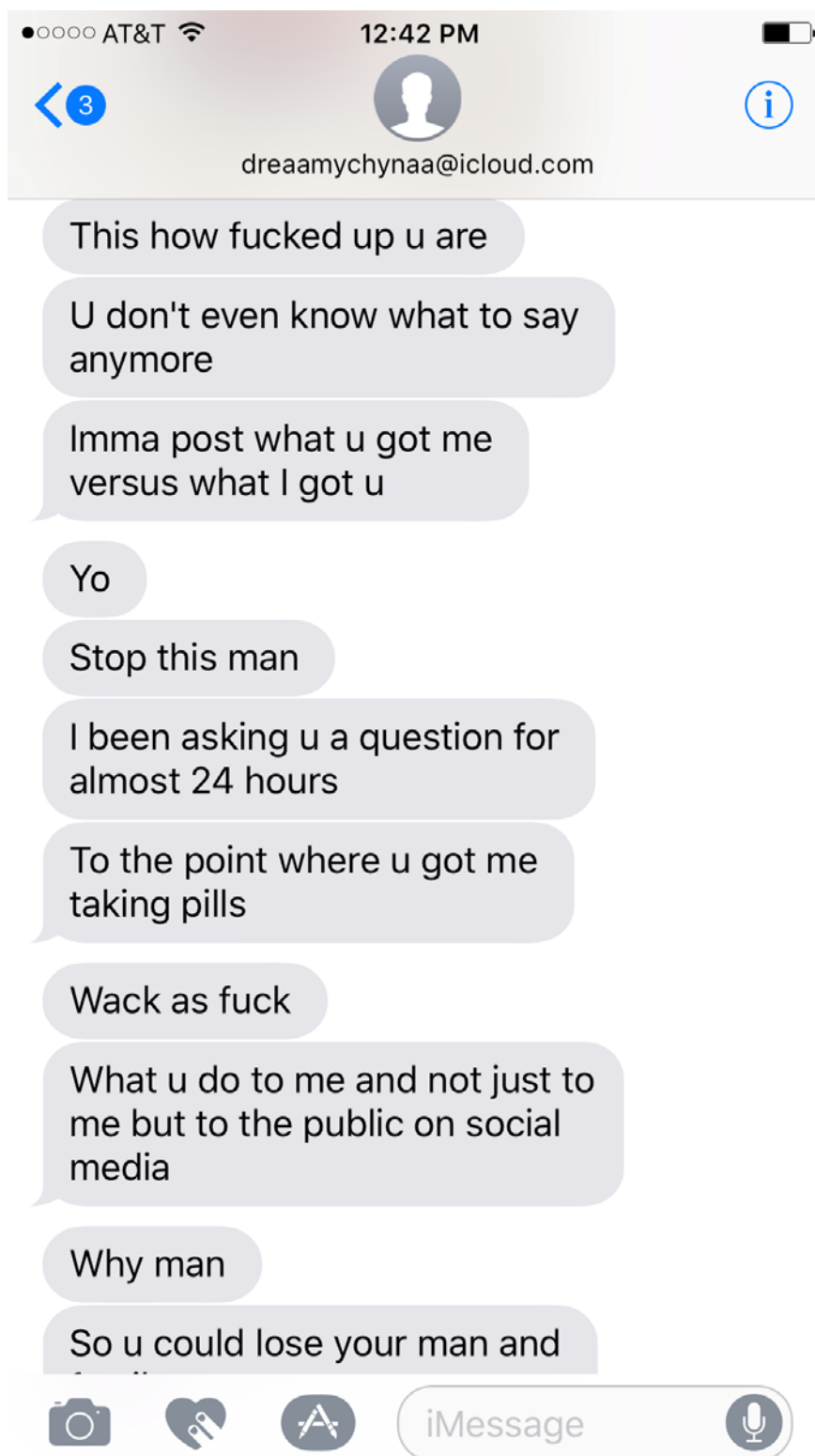
4 57. Again, Defendant continued to harass Ms. White and said, “I just hope that tyga
5 treats Dream well not like what he said to u when she was still in your belly. And if u guys
6 don’t want her my mom will be happy to be with her and love her.” In the same text message,
7 Rob Kardashian went on to say, “So answer the one question that u been avoiding since last
8 night . . . So I can at least die with knowing . . . Why didn’t u thank me on social media ? Was
9 it cuz your man tyga be on u and u don’t want to ruin that ?” Again, Ms. White did not respond
10 to Defendant’s harassment.



1 58. Rob Kardashian continued to threaten to kill himself over multiple text messages
2 because Ms. White would not explain why she did not thank him on social media for a red
3 Ferrari he leased for her as a gift in or around May 2017. Defendant continued to rant, “Shit is
4 wack as fuck man. Say something. I wanna know what it is. R u embarrassed of me. U was
5 so happy to post the lambo before I didn’t even have to ask. I just wanna know why man so I
6 can kill myself in peace.” Ms. White again did not respond.



59. In another text message, Rob Kardashian said, “Yo. Stop this man. I been asking u a question for almost 24 hours. To the point where u got me taking pills.”



60. In another text message, Rob Kardashian sent a photo of him with a hand full of pills—as if he was going to take his own life if Ms. White did not respond to his texts right at that moment.



1 61. Rob Kardashian was relentless in constantly harassing Ms. White such that when
2 Ms. White blocked one email address, Defendant simply created a new email address so that he
3 could continue harassing her.

4 62. In the two months prior to Rob Kardashian’s social media rant on July 5, 2017,
5 Ms. White was forced to change her phone number at least three times to avoid Defendant’s
6 harassment and abusive attempts to manipulate her through threats of suicide.

7 **VI. ROB’S SOCIAL MEDIA ATTACK ON JULY 5, 2017**

8 63. After the December 2016 break-up, Ms. White moved into her own home. Ms.
9 White and Rob Kardashian were single people, living separate lives, and peacefully sharing
10 custody of their child. Ms. White occasionally dated, as Rob Kardashian presumably did as
11 well. However, in the midst of living their own separate lives, Rob Kardashian continued to
12 harass Ms. White with insistent text messages, emails, phone calls, and social media posts.

13 64. On or around July 5, 2017, Rob Kardashian chose to launch a vicious social
14 media tirade designed to hurt and publicly shame Ms. White—the mother of his only child.

15 65. On July 5, 2017, Rob Kardashian first took to his Instagram page to post revenge
16 porn while ranting against and publicly shaming Ms. White. When Rob Kardashian publicly
17 attacked Ms. White, not only did he have over nine million followers but his profile was
18 available for the public to view. As a result, it was not just Rob’s over nine million Instagram
19 followers that witnessed his social media attack on Ms. White but rather the entire world
20 witnessed it as well.

21 66. Moreover, Rob Kardashian’s graphic, defamatory, and abusive social media
22 posts about Ms. White that day have forever been memorialized online as media outlets all over
23 the world took screen grabs and reposted them time-and-time again in reporting the story.⁵ In
24 fact, on July 6, 2017, Rob Kardashian’s social media attack made “Poor Dream” a worldwide
25 trending topic on Twitter along with his and Ms. White’s names. Accordingly, Rob
26 Kardashian’s social media tirade made his daughter, her mother, and himself some of the most

27
28 ⁵ One day, Dream will be able to search online and see all that her father said about her mother,
including the post in which Rob accused Ms. White of having Dream “out of spite.”

1 talked about and retweeted topics for days. According to July 2017 Google Trends, Ms. White
2 was the third most trending person on Google with Rob Kardashian coming in as fourth. In the
3 months following the July 5 attack, a Google search for “Rob Kardashian Revenge Porn Blac
4 Chyna” reveals that over 1.2 million news articles have been published online reporting on the
5 event.

6 67. Rob Kardashian’s Instagram account, with over nine million followers, was
7 deleted by Instagram after he posted photos of Ms. White’s genitals, buttocks, and nipples. In
8 one post, Rob Kardashian said, “This is a pic Chyna just sent me before she fucked another man
9 in her house with my baby in the house and her son in the house. . .”⁶ This statement was false
10 and specifically designed to harm Ms. White’s reputation by slut-shaming her.



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27 ⁶ The original image posted by Rob Kardashian was not censored with an emoji as that was later
28 added to the image by Instagram as a means of censoring the graphic nude photo.

68. The truth is that Rob Kardashian and Ms. White had not been romantically involved for months. Ms. White sent these private nude photos to her former fiancé after they had broken-up and only because Rob Kardashian would beg for Ms. White to send him nude photos, saying, “Quick go in the bathroom take [a] quick pic for me to cum to.” Ignoring him did not work. Telling him to stop did not work. She thought giving him the photos he wanted might work. Sadly, it did not.



69. Also on July 5, 2017, after being blocked from Instagram, Rob Kardashian, undeterred and intent on inflicting the maximum harm on Ms. White, took to his Twitter account with an “lol” (laugh out loud) and posted more nude photos of Ms. White. In this posting, he cruelly taunted her: “And for all u wondering why her damn nipples are so damn big thats cuz she had surgery after the baby was born on our anniversary January 25 that I paid 100k for and they really messed up on her nipples. Them shits used to be so cute and now they so damn big!”

70. In another one of Rob’s posts on July 5, 2017, he shared a photo of Ms. White’s nude rear-end and said, “Whoa that’s crazy u let me cum inside u and then another man do the same in the same bed and the same robe and everything in the house where I pay 16K rent. Sheesh. And so u know she had her butt reduced but I know it still looks wild.” At no time did Rob Kardashian have Ms. White’s permission to publish these photos or information online, nor did Rob Kardashian ever attempt to seek Ms. White’s consent to share these photos or her personal medical information before he posted them for his millions of Instagram and Twitter followers and the rest of the world to see.⁷



⁷ The original image posted by Rob Kardashian was not censored with an emoji as that was later added to the image by Instagram as a means of censoring the graphic nude photo.

71. Rob Kardashian continued to intentionally publicly shame Ms. White by posting a picture and video of Ms. White in the hospital about to undergo surgery. In this post, he said, “Everyone wonders how Chyna lost all that weight after the baby and she lies to everyone but no I’m such a great husband that on our anniversary I paid 100K to do this surgery to get all everything fixed . . .” This statement was false as (i) he was never her husband, and (ii) Ms. White had not deceived anyone as to her cosmetic procedure.



72. In fact, Rob Kardashian himself underwent weight loss surgery that cost \$100,000, whereas Ms. White’s surgery was for a lesser amount. Ms. White underwent minor cosmetic procedures including a breast and butt reduction as well as a small amount of liposuction around her belly button. Ms. White is a well-known social media influencer and trendsetter, who professionally endorses health, lifestyle, and diet products on her Instagram and Twitter accounts. Accordingly, the manner in which Rob Kardashian revealed Ms. White’s personal medical information jeopardized Ms. White’s endorsement deals with several weight loss, fitness, and diet companies—that all pay Ms. White to promote their products on social media.

1 73. Additionally, Rob Kardashian did not pay for Ms. White’s cosmetic procedure
2 out of the kindness of his own heart or because he was “such a great [h]usband.” In fact, Rob
3 Kardashian only paid the cost of the surgery upfront because he planned for the network to
4 reimburse him for the costs out of the budget from “Rob & Chyna” season two.

5 74. Additionally, during his July 5 social media rant, Rob Kardashian threatened to
6 post online Ms. White’s residential address when he announced to the world the city she lives
7 in, and that she did not live in a gated community. Ms. White does not live in a gated
8 community and posting her residential address would endanger Ms. White and her two small
9 children. Rob Kardashian’s threat to expose Ms. White’s address truly terrified her as to her
10 own personal safety as well as that of her children.

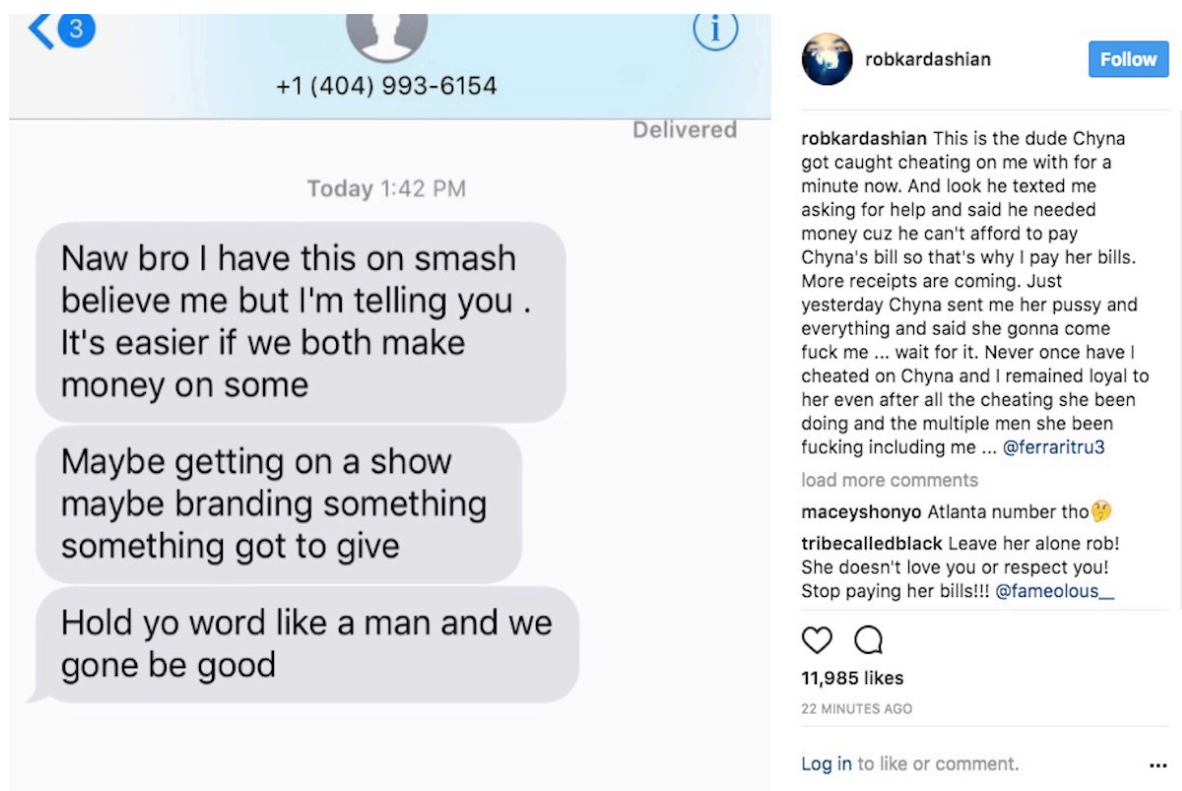
11 75. On information and belief, Rob Kardashian also posted a screen grab of a text
12 message conversation between Ms. White and him, in which Ms. White’s phone number was
13 revealed to the world. This required Ms. White to change her phone number yet again as a
14 result of Rob Kardashian’s wrongful conduct.

15 76. Rob Kardashian’s social media rant on July 5, 2017, also contained numerous
16 false implications about Ms. White, which caused her to suffer harm both personally and
17 professionally.

18 77. During his social media tirade, Rob Kardashian falsely implied that his romantic
19 relationship with Ms. White had only recently ended when he said, “But she couldn’t remain
20 loyal and cheated and fucked way too many people and she got caught and now this is all
21 happening and it’s sad.”

22 78. In another post, Rob Kardashian again falsely implied that he and Ms. White
23 were currently in a relationship and that she had recently been unfaithful to him when he said,
24 “This is the dude Chyna got caught cheating on me with for a minute now . . . Just yesterday
25 Chyna sent me her pussy and everything and said she gonna come fuck me . . .” Ms. White and
26 Rob Kardashian broken-up in December 2016 and have not been romantically involved for
27
28

months.⁸ Moreover, Ms. White did not tell Rob Kardashian that she was “gonna come fuck [him].”



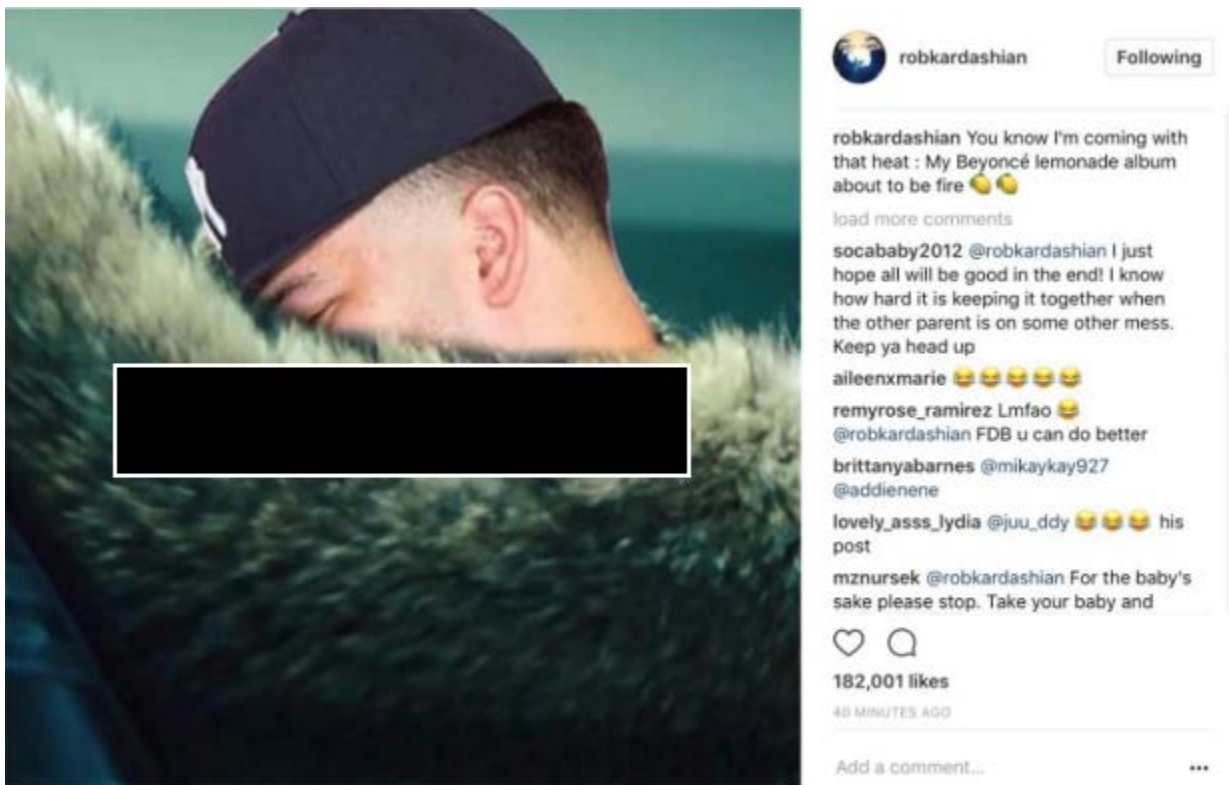
79. Also on July 5, 2017 Rob Kardashian falsely stated that he paid \$100,000 for Ms. White’s alleged weight loss surgery. Rob Kardashian knew that falsely claiming that he spent large sums of money on Ms. White’s cosmetic surgery would harm her reputation and business relationships. Additionally, Rob Kardashian did not pay for Ms. White’s cosmetic procedure out of the kindness of his own heart. In fact, Rob Kardashian only paid the cost of the surgery upfront because he planned for the network to reimburse him for the costs out of the budget from “Rob & Chyna” season two.

80. At the time, Ms. White’s procedure was being filmed as part of the second season of the “Rob & Chyna.” As part of the story line for “Rob & Chyna” season two, Ms. White planned to discuss her struggles in dealing with her body-image issues, particularly as

⁸ In fact, Rob Kardashian had recently sent Ms. White a text message in which he acknowledged Ms. White informing him that she had been romantically involved with other men as further proof that Rob Kardashian knew their relationship was long over.

they pertained to the size of her rear-end after giving birth to Dream. During his July 5 social media rant, Rob Kardashian made sure to falsely accuse Ms. White of undergoing weight-loss surgery to lose weight after having Dream.

81. In fact, Rob Kardashian acknowledged Ms. White’s endorsements on July 5, 2017, when he posted a meme containing a photo of himself dressed as Beyoncé with the words “Flat Tummy Tea” on top. In the caption of the post, he Kardashian said, “You know I’m coming with that heat: My Beyoncé lemonade album about to be fire.” In other words, Mr. Kardashian was going to publicly shame Ms. White in an even bigger way for her perceived infidelity – even though they were no longer in a relationship.



82. During his July 5 social media tirade, Rob Kardashian knew that falsely accusing Ms. White of undergoing “weight loss surgery” after giving birth to Dream would generally damage her reputation as a social media influencer. Importantly, Rob Kardashian knew that targeting a specific brand in his July 5 tirade would destroy Ms. White’s professional relationship with that brand as a social media influencer.

83. Most egregiously, on July 5, 2017, Rob Kardashian falsely stated that Ms. White had her daughter “out of spite” and even suggested that Ms. White had her daughter in an effort to seek revenge on ex fiancé Tyga.⁹



ROBERT KARDASHIAN @robkardashian · 21h

Soon as kylie and tyga broke up Chyna was over the game. She had a baby out of spite and I'll never view her the same.

3.9K 62K 205K

84. During his social media rant Rob Kardashian falsely claimed that he “never once” cheated on Ms. White and that he “remained loyal to her even after all the cheating she been doing and the multiple men she been fucking including [himself].” Ms. White did not cheat on Rob Kardashian during their relationship. However, Ms. White did not refrain from dating as a single woman in the time since her relationship with Rob Kardashian ended in December 2016. She was a single woman and fully entitled to have a love life beyond Rob Kardashian on July 5, 2017 when he falsely accused of her of engaging in infidelity.

85. Rob Kardashian erroneously claimed that Ms. White chose drugs and sex rather than spending the day with her daughter on her first 4th of July, when he posted, “Get it together for your daughter. It was your daughter’s first 4th of July yesterday and u chose drugs and sex in our bed rather [than] spending it with your daughter for her first 4th of July.” However, Ms. White did not choose drugs and sex in lieu of spending time with her daughter on the 4th of July. Since their split in December 2016, Rob Kardashian has had physical custody of their daughter on Tuesdays—the exact day on which the 4th of July fell this year.

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⁹ Rob Kardashian has regularly accused Ms. White of being in a relationship with him as a means to get revenge on Tyga—this is a constant theme throughout Rob Kardashian’s harassment of Ms. White.

86. In another post on July 5, 2017, Rob Kardashian falsely accused Ms. White of withholding their daughter from seeing him. However, this claim was entirely false as Defendant had custody of their daughter Dream on July 5, 2017—the very day he decided to attack Ms. White on social media. Ms. White has never withheld Dream from her father.



♥ 89,937 likes

robkardashian Last one ! But she really stole my eggos and BBQ sauce and the whole freezer was full of eggos 🤔🤔💔 but bring Dream back to her Dad please 🙏 she blocked me or else I would ask to see her and she has the guard gate not letting me in the gate either. I just miss baby Dream 😭

VII. ROB'S PAST ABUSE OF WOMEN

87. Rob Kardashian's social media rant against Ms. White was not the first time he took to social media to publicly shame one of his former girlfriends. Rob Kardashian has a long history of publicly slut-shaming his exes on social media after break-ups.

A. Rita Ora

88. In or around December 2012, Rob Kardashian took his Twitter account to publicly slut-shame Rita Ora, a pop star who briefly dated Rob in 2012. During Rob Kardashian's social media rant against Rita Ora, he said, "This is a lesson to all the young women out there to not have unprotected sex with multiple men especially while in a

relationship.” Rob Kardashian continued on this rant against Ora and said, “But when a woman disrespects herself by messing with more than 20 men all while being in a relationship with a Faithful man . . . When a woman cheats on you with one man I can live with that. People make mistakes, trust me. I have forgiven numerous times . . .”

89. Even Rob’s sister, Defendant Khloe Kardashian, joined in on his social media rant by indirectly ridiculing Ora by tweeting, “Cheaters never prosper @RobKardashian ill be home today . . . Try and smile little brother.” Rob then continued his slut-shaming rant against Ora and said, “I’m actually disgusted a woman could give up her body to more than 20 dudes in less than a year’s time while trying to start a career.”

90. Even Rob’s sister, Defendant Khloe Kardashian, joined in on his social media rant by indirectly ridiculing Ora by tweeting, “Cheaters never prosper @RobKardashian ill be home today . . . Try and smile little brother.” Rob then continued his rant against Ora and said, “I’m actually disgusted a woman could give up her body to more than 20 dudes in less than a year’s time while trying to start a career.”



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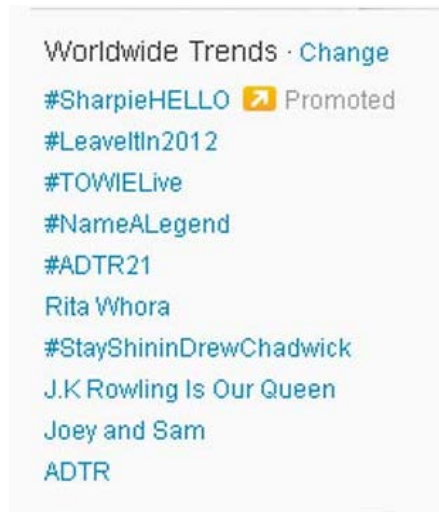
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85. Rob Kardashian continued on his social media rant against Ora and said, “She cheated on me with nearly 20 dudes while we were together, I wonder how many she will sleep with now that we apart? But I mean 20?!!!”



86. In responding to an alleged tweet deleted by Ora, Rob Kardashian said, “So you let me get you pregnant and you let others hit raw?” Accordingly, Rob has demonstrated a pattern of revealing ex-girlfriends’ sensitive medical information online in vengeful social media posts after break-ups.

87. While Rob Kardashian did not refer to Rita Ora directly by name in his tweets, the public was well aware as to whom these attacks were aimed as the pop singer developed an unflattering nickname “Rita Whora” that remained a worldwide trending topic the same day as Rob’s social media rant.



1 **B. Adrienne Bailon**

2 88. Rob Kardashian dated Adrienne Bailon from 2007 to 2009. Their relationship
3 was even briefly featured on “Keeping Up with the Kardashians.”

4 89. In one episode, Rob Kardashian is seen fighting with his then-girlfriend
5 Adrienne Bailon in front of his family. In this clip, Rob yells at Bailon for “calling off the
6 f***king wedding in India.” Rob Kardashian then violently grabbed Bailon by the arm, and



16 slapped her across the face, as his mother, Defendant Kris Jenner looks on. Later in the episode
17 it is revealed that Rob thought it would be funny to pretend he was slapping his girlfriend and
18 that the altercation was merely a prank. In doing so, Rob Kardashian played domestic violence
19 for laughs in this early episode of “Keeping Up with the Kardashians.”

20 90. Then in 2014, years after the couple split, Bailon again became a target for Rob
21 and his famous family when she addressed her stint on the Kardashian’s reality show in an
22 interview with Latina magazine. During this interview Bailon said, “To be stuck with that
23 Kardashian label, that was so hurtful to me and to my career.” Bailon continued, “I probably
24 realized that too late—not that it would’ve affected my decisions in terms of who I dated, but it
25 would’ve affected my decision to appear on the show.” Bailon also claimed that she still
26 received hate from Kardashian fans, saying, “To this day, people will say, ‘You ruined Rob’s
27 life’ and I’ll think, ‘Damn, I was still playing with Barbie dolls when I met him.’”

1 91. Shortly after Bailon’s interview was made public, Defendant Kim Kardashian
2 took to social media to attack Bailon and said, “Funny how [Bailon] says being with a
3 Kardashian hurt her career yet the only reason she has this article is bc she is talking about a
4 Kardashian.” Kim then said, “So sad when people try to kick my brother when he is down
5 #FamilyForever.”

6 92. Kim and Khloe’s posts are just examples of how far the Kardashians will go to
7 bully Rob Kardashian’s ex-girlfriends—even years after they have broken-up with him.

8 **VIII. REALITY TELEVISION ROYALTY**

9 93. “Keeping Up with the Kardashians” is a hit reality television program on the E!
10 Network that focuses on the Kardashian-Jenner family. The show originally starred Kim
11 Kardashian and her entire family including her mother Kris Jenner, her then-stepparent Bruce
12 Jenner, as well as her siblings Rob Kardashian, Khloe Kardashian, Kourtney Kardashian,
13 Kendall Jenner, and Kylie Jenner. In recent years, “Keeping Up with the Kardashians” stars
14 Kris Jenner and her daughters Kim, Khloe, Kourtney, Kendall and Kylie.

15 94. The series originally debuted on October 14, 2007, making it one of the longest-
16 running reality television shows in America. The show has also catapulted Kim Kardashian
17 and her family into super stardom as the Kardashian-Jenner broad are now household names
18 and reality television royalty.

19 95. “Keeping Up with the Kardashians” just concluded its thirteenth season in June
20 2017.

21 96. “Keeping Up with the Kardashians” has made ratings success for the E! network
22 since its 2007 premiere. As such, the series has given rise to a host of spin-off series including,
23 “Rob & Chyna” and “The Life of Kylie.”

24 97. On or around June 1, 2016, “Rob & Chyna” was greenlit by the E! network. The
25 series followed Rob Kardashian and Ms. White’s relationship as they prepared to welcome their
26 first child together. The network originally ordered 6 one-hour long episodes as well as a
27 special featuring the birth of the couple’s baby girl Dream Kardashian.

1 98. “Rob & Chyna” originally premiered on September 11, 2016, to stellar ratings as
2 it delivered approximately 2.7 million viewers—making it E! network’s most watched
3 unscripted series debut in 2016 among its primary demographic adults 18-34.

4 99. On information and belief, the E! network would have renewed the series for a
5 second season, which was to consist of eight episodes and was expected to air some time in
6 2017. However, in or around March 2017, the network announced that “Rob & Chyna” would
7 not film its second season.

8 **IX. KARDASHIANS INTERFERE WITH SECOND SEASON OF “ROB & CHYNA”**

9 100. On information and belief, Ms. White alleges that Defendants Kris Jenner, Kim
10 Kardashian, Khloe Kardashian, Kourtney Kardashian, Kendall Jenner, and Kylie Jenner
11 intentionally interfered with Ms. White’s Talent Agreement with the E! network. Defendants
12 also intentionally interfered with Ms. White’s prospective economic advantage in filming a
13 second season of “Rob & Chyna.”

14 101. In or around February 2017, the E! network decided to move forward with a
15 second season of its hit show “Rob & Chyna”, despite that the couple split months prior in
16 December 2016, all necessary parties agreed to film a second season focusing on Rob and
17 Chyna’s relationship co-parenting their baby girl Dream Kardashian. Not only were the stars
18 and the network onboard to film the second season but Bunim/Murray Productions was also on
19 board with season two of one of E! network’s top-rated shows, “Rob & Chyna.”

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1 102. Further, the second season of “Rob & Chyna” was already being promoted
2 before the first season even ended. The first season of “Rob & Chyna” closed with a screen
3 grab of Ms. White, Rob, Dream and King all together and a caption that read, “New Season
4 Coming 2017.”



17 103. On February 8, 2017, Jeffrey Fuhrman, the Senior Vice President of Business
18 Affairs at the E! network emailed Ms. White’s agent and said, “E! is seeking to increase Blac
19 Chyna’s participation on the next seasons of ‘Keeping Up with the Kardashians’ to address Rob
20 and Chyna’s storyline with the goal of bringing ‘Rob & Chyna’ back shortly thereafter.” As
21 such, the network planned to bring “Rob & Chyna” back for a second season even after the
22 couple broke-up in December 2016.

23 104. Moreover, in or around February 2017, pre-production for the second season of
24 “Rob & Chyna” was well-underway as producers were being selected and story lines were
25 being planned as indicated in an email exchange between NBC Universal executive¹⁰
26 Demondre Edwards and Ms. White’s entertainment attorney Walter Mosley. On February 16,

27 _____
28 ¹⁰ The E! Network is part of NBCUniversal Cable Entertainment Group, which a subsidiary of
NBC Universal.

1 2017, Demondre Edwards, who is NBC Universal’s Director of Business and Legal Affairs,
2 emailed Mosley and said, “Did you have a chance to discuss the creative of the shoot with the
3 showrunner? Just trying to see if we’re all on the same page.” It is clear from these
4 communications that the network was not only onboard with filming a second season of “Rob
5 & Chyna” but that it was already actively working on the second season when Rob
6 Kardashian’s family intentionally interfered with production on the second season.

7 105. On information and belief, in or around February 2017, Defendants Kris Jenner,
8 Kim Kardashian, Khloe Kardashian, Kourtney Kardashian, Kendall Jenner, and Kylie Jenner
9 contacted E! network executives to demand the network not proceed with a second season of
10 “Rob & Chyna.”

11 106. Shortly thereafter, attorneys for the network informed Ms. White and her legal
12 team that the network could not proceed with filming the second season as Rob’s mother Kris
13 Jenner and his sisters Kim Kardashian, Khloe Kardashian, Kourtney Kardashian, Kendall
14 Jenner, and Kylie Jenner demanded the second season of “Rob & Chyna” not be filmed.

15 107. Also around this time, Bunim/Murray Productions confirmed that it was the
16 network’s current position that the reason the second season was not proceeding was indeed
17 because Kris Jenner and the Kardashian-Jenner sisters demanded it not be filmed.

18 108. After Rob’s family interfered with Ms. White’s existing Talent Agreement with
19 E! Media Productions LLC (hereinafter “the E! network”) the E! network agreed to table
20 negotiations for the second season of “Rob & Chyna”. On February 8, 2017, the E! network
21 even sought a seven-month extension on Ms. White’s second season option, which would have
22 allowed the network until October 16, 2017 to decide whether it would pick-up “Rob & Chyna”
23 for a second season as indicated in an email from Jeffrey Fuhrman to Ms. White’s agent.

24 109. As a result, in or around February 2017, the E! network agreed to pay Ms. White
25 to appear on four episodes of “Keeping Up with the Kardashians” at the rate she would have
26 been paid for an episode of “Rob & Chyna.” However, this agreement was always intended to
27 give the network a few months to reconvene negotiations for season two after the Kris Jenner
28 and the Kardashian sisters had time to “cool off.”

1 110. At all times relevant, Rob Kardashian was in favor of filming a second season of
2 “Rob & Chyna.” In fact, Rob Kardashian was so much in favor of a second season of “Rob &
3 Chyna” that he personally contacted one of the show’s creators, Ryan Seacrest to intervene with
4 Rob’s family. Rob even contacted Jeff Jenkins and Farnaz Farjam, executive producers of both
5 “Rob & Chyna” and “Keeping Up with the Kardashians” to intervene so as to save the second
6 season. However, Rob’s efforts were to no avail.

7 111. Then in or around April 2017, Rob Kardashian texted Ms. White to inform her
8 that he spoke to his mother and said, “Why don’t you let Chyna do her own show so Dream can
9 make some money?” Again, Rob’s efforts to convince his family otherwise as to a second
10 season proved unsuccessful.

11 112. Despite the E! network paying Ms. White to appear on four episodes during the
12 thirteenth season of “Keeping Up with the Kardashians,” Ms. White only actually appeared on
13 one episode as Rob Kardashian’s famous family once again intervened to harm Ms. White.

14 113. The Defendants’ intentional interference with the second season of “Rob &
15 Chyna” was reported in an article by the entertainment trade publication *Variety* on July 7,
16 2017—two days following Rob Kardashian’s social media attack on Ms. White.

17 114. In this article, the trade publication confirmed that the show “had already been
18 taken off the network’s schedule, prior to this week’s romantic falling out.”

19 115. In the *Variety* article, an E! network spokesperson even confirmed that the
20 decision to pull “Rob & Chyna” was not the decision of the network or the show’s stars but
21 rather Rob’s powerful family. In doing so, the network spokesperson said, “As always we
22 follow the family’s lead regarding their lives and relationships, and viewers saw firsthand as the
23 *family* discussed putting ‘Rob & Chyna’ on hold in an episode of ‘Keeping Up with the
24 Kardashians’ this spring.” (emphasis added.)

25 116. The *Variety* article also reported that E! had not yet officially cancelled “Rob &
26 Chyna”—even in the wake of Rob’s social media rant on July 5, 2017—thus, indicating that the
27 network was still interested in pursuing a second season of “Rob & Chyna.”
28

1 117. As mentioned in the *Variety* article, Rob Kardashian’s family made their
2 disapproval of a second season of “Rob & Chyna” no secret.

3 118. In fact, an episode¹¹ that aired during the most recent season of “Keeping Up
4 with the Kardashians” dedicated a substantial time to the topic of whether Rob and Ms. White
5 should film a second season of “Rob & Chyna.” During this episode, Kris Jenner and her
6 daughters Kim, Khloe, Kourtney, Kendall, and Kylie all gather at a restaurant to discuss
7 whether a second season of “Rob & Chyna” should be filmed. Most notably, neither Rob nor
8 Chyna were present at this meeting where Rob’s family discussed the fate of their show “Rob &
9 Chyna.”

10 119. In this scene, Defendant Kim Kardashian explained, “Rob and Chyna are about
11 to start filming the second season of their show. And no one feels that they should fuel this bad
12 unhealthy energy by filming another season of their show . . .”

13 120. During this scene, Defendant Khloe Kardashian said, “To be honest with you,
14 this is such a toxic relationship and we all don’t think it’s a good idea that they film this show.”

15 121. While dining, Defendant Kim Kardashian calls Rob on speaker phone and
16 explains, “So I am here with everyone. When we get protective over you, it’s just us saying
17 like hey, (sic) all fucking shit like this happened to all of us before.” To which Rob Kardashian
18 responded, “But I never once said or judged or tried to change the outcome of any of your guys’
19 relationships.” During this phone call, Defendant Khloe Kardashian interjects and accused Rob
20 of having his “head so far up Chyna’s ass.” At which point, Rob yells “Yo, I’m done! I’m
21 done!” and hangs up the phone on his family.

22 122. After the phone call, Rob’s family continues to discuss whether “Rob & Chyna”
23 should film for a second season. Defendant Kris Jenner tells the table, “Do you know what Rob
24 does all day? Calls her names and says she’s a lot worse things—” Defendant Kylie Jenner
25 then interrupted her mother and asked, “So why would you want to put them on a show
26 together?”

27 _____
28 ¹¹ The episode in question was entitled “The Ex Files” and originally aired as episode 7 of
 season 13 on April 23, 2017. The show is taped weeks or months earlier.

1 123. Defendant Kendall Jenner exclaimed, “A show should not be coming out of
2 anyone’s mouth because that is the craziest thing that I have ever heard! The fact that
3 everyone’s lives revolve around a show and to make someone happy with a show is the most
4 sad depressing thing—” Defendant Kourtney Kardashian then explained to her younger sister,
5 “But it is a job! It’s their life.” Defendant Kim Kardashian agrees, saying, “It’s a job.”

6 124. Defendant Kris Jenner, then points her finger at Kendall and says, “Hey! That
7 show is what got him out of bed!”¹²

8 125. Later in the scene, Defendant Kim Kardashian explained, “I think Rob is trying
9 to hold on to the show because it is his way of holding onto Chyna and it is his way to make
10 Chyna happy. He is trying to please someone else and I think that it is just too much.”

11 126. While Kim Kardashian’s interview suggests that the family is merely stepping in
12 to protect their brother from his evil ex, in reality, the Kardashian-Jenner family were up to
13 something much more nefarious. Rather than trying to protect Rob Kardashian from cameras,
14 in reality, the famous family was flexing their muscles so as to destroy Ms. White’s career so
15 that she was no longer able to compete against the Kardashian-Jenner women as an
16 entrepreneur and social media influencer.

17 127. Moreover, Ms. White alleges on information and belief that in killing the second
18 season of “Rob & Chyna,” Defendants ensured that the E! network had room in its schedule for
19 Kylie Jenner to star in her own show, in which she heavily promoted Kylie Cosmetics, which
20 was once in direct competition with LASHED by Blac Chyna.

21 128. Later in this episode, Defendant Kourtney Kardashian tells Scott Disick, the
22 father of her children, about the meeting and said, “So we had a meeting about Rob and Chyna
23 and just like if they should have their show or not. I mean we were just saying for the
24 wellbeing of like Rob that we don’t really think that he should have it.”

25 129. In standing up for Rob, Scott Disick, said, “It’s not the worst thing in the world
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27

28 ¹² Prior to his romantic relationship with Ms. White, Rob Kardashian spent years being
depressed and began to live reclusively as he gained a significant amount of weight.

1 for him to show the world what happened and to share his side. I mean I feel like ultimately
2 like this is like really should be Rob and Chyna's decision . . ." Defendant Kourtney
3 Kardashian responded, "I personally just don't think like shooting season 2 of 'Rob & Chyna'
4 is the best decision . . ."

5 130. However, when Scott asked her if Rob wants to shoot a second season,
6 Defendant Kourtney Kardashian said, "Yeah."

7 131. In a later scene, Rob Kardashian explains the dynamics of his relationship with
8 Ms. White and says, "She says what she has to say to you because she's in the heat of the
9 moment and that's what it is. Just like I post shit on the internet when I'm in the heat of the
10 moment, she texts all her people and lets them know what's going on in our relationship." On
11 information and belief, in this scene, Rob Kardashian is defending his relationship to his mother
12 after he made a spectacle of their split by posting videos on Snapchat after Ms. White left him.

13 132. Later in this "Keeping Up with the Kardashians" episode, Defendants Kim and
14 Kourtney Kardashian receive an email from Rob in which he pleads with this family to allow
15 "Rob & Chyna" to film for the second season. Defendant Kim Kardashian reads the email
16 aloud, in which Rob explained why he wanted a second season and said:

17 "I'm trying to work on myself, trying to grow and change and I'm looking to
18 be the man you all are proud of. Part of that is working through my issues
19 with Chyna. I love Chyna and I want to be able to tell my daughter that I did
20 everything I could to make it work with her mother. Most of my confidence
21 comes from me having this show everyday. **I want a second season of 'Rob
& Chyna.'** I wanna use this show to make myself stronger."

22 133. In the last scene of the episode, Rob sits down with his sisters, Defendants Kim
23 and Kourtney Kardashian to explain face-to-face why he wanted to have a second season of
24 "Rob & Chyna." During this meeting Rob said, "**I was doing good when we were filming,**
25 **obviously.** Things were great this year and then the end of the year just like things ended on a
26 whatever note." Rob then said, "Like you can't tell someone how to live their lives, they just
27 have to figure it out themselves." While Defendant Kim Kardashian tells Rob, "ultimately, it is
28 up to you."

1 134. In reality, Rob Kardashian’s mother and sisters did not allow him to decide the
2 fate of the second season of “Rob & Chyna”—nor did they allow Ms. White to decide. Rather,
3 Defendants Kris Jenner, Kim Kardashian, Khloe Kardashian, Kourtney Kardashian, Kendall
4 Jenner, and Kylie Jenner invoked their power and influence over the E! network to kill the
5 second season of “Rob & Chyna.” They did so despite the fact that the stars of the show, the
6 production company, and the network were all on board with a second season of the highly
7 rated reality spinoff series.

8 **X. THE KARDASHIAN-JENNER FAMILY CONTINUE TO DEFAME MS. WHITE**

9 135. Ms. White alleges on information and belief that Rob Kardashian and his family
10 continue to defame her in the press. As recent as September 15, 2017, Rob Kardashian, his
11 family, and/or their agents leaked a false and defamatory story about Ms. White to the press.¹³

12 136. Ms. White alleges that Rob Kardashian and his family published the false
13 statements in this story to further damage her reputation. In this story, it was falsely stated that
14 Rob Kardashian received more than fifty percent custody of Dream and that Ms. White “wanted
15 north of \$50k” a month in child support.

16 137. Further, these sources falsely implied that Ms. White was a bad mother when
17 they said, “[Ms. White] left Dream at home this weekend while she left to party, and [Rob
18 Kardashian] wants to make sure there are enough nannies to protect [Dream].” The truth is that
19 Ms. White left Dream with a nanny while she was working at a paid public appearance. Rob
20 Kardashian made similar accusations against Ms. White through his attorneys during
21 confidential settlement negotiations for their family law case.

22 138. Accordingly, Rob Kardashian and his famous family continue to defame Ms.
23 White even after his vicious social media tirade on July 5, 2017.

24 ///

25 ///

26 ¹³ On information and belief, these sources were Defendants and/or their respective agents, as
27 the information revealed was a part of confidential settlement discussions taking place in their
28 family law case. Accordingly, Defendant Rob Kardashian and his family were the only people
to know the true details of Rob Kardashian and Ms. White’s custody agreement.

1 **FIRST CAUSE OF ACTION**

2 **(ASSAULT)**

3 **(as Against Defendant Rob Kardashian)**

4 139. Ms. White restates and incorporates by reference, as though fully set forth
5 herein, the allegations contained in each of the paragraphs above.

6 140. On or around April 8, 2017, Rob Kardashian intended to cause and did cause
7 Ms. White to suffer apprehension of an immediate harmful contact to her person when he
8 grabbed her phone from her and violently knocked her to the ground in the presence of her 4-
9 year-old son.

10 141. Ms. White did not consent to Rob Kardashian's objectively unreasonable acts of
11 yelling at her, aggressively grabbing her phone out of her hand and violently knocking her to
12 the ground.

13 142. By engaging in the conduct as hereinabove alleged, Defendant Rob Kardashian
14 acted with malice, fraud, and oppression and/or conscious disregard of Ms. White's rights, and
15 well-being, and intended to subject Ms. White to unjust hardship thereby warranting an
16 assessment of punitive damages in an amount sufficient to punish Defendant and deter others
17 from engaging in similar conduct.

18 143. As a direct and proximate result of Rob Kardashian's conduct on or around April
19 8, 2017, as alleged herein, Ms. White suffered, and will continue to suffer the damages herein
20 mentioned, in an amount according to proof at trial.

21 **SECOND CAUSE OF ACTION**

22 **(BATTERY)**

23 **(as Against Defendant Rob Kardashian)**

24 144. Ms. White restates and incorporates by reference, as though fully set forth
25 herein, the allegations contained in each of the paragraphs above.

26 145. On or around April 8, 2017, Rob Kardashian touched or caused Ms. White to be
27 touched with the intent to harm or offend her when he aggressively grabbed her phone from her
28 hand and violently knocked her to the ground.

1 146. At all times relevant, Ms. White did not consent to Rob Kardashian’s conduct in
2 aggressively grabbing her phone and violently knocking her to the ground in the presence of her
3 4-year-old son.

4 147. As a result of Mr. Kardashian’s harmful and offensive touching, Ms. White was
5 injured and suffered difficulty walking for days following the attack.

6 148. By engaging in the conduct as hereinabove alleged, Defendant Rob Kardashian
7 acted with malice, fraud, and oppression and/or conscious disregard of Ms. White’s rights, and
8 well-being, and intended to subject Ms. White to unjust hardship thereby warranting an
9 assessment of punitive damages in an amount sufficient to punish Defendant and deter others
10 from engaging in similar conduct.

11 149. As a direct and proximate result of Rob Kardashian’s conduct, as alleged herein,
12 Ms. White has suffered, and will continue to suffer the damages herein mentioned, in an
13 amount according to proof at trial.

14 **THIRD CAUSE OF ACTION**

15 **(VIOLATION OF CAL. CIV. CODE § 1708.85—DISTRIBUTION OF PRIVATE**
16 **SEXUALLY EXPLICIT MATERIALS)**

17 **(as Against Defendant Rob Kardashian)**

18 150. Ms. White restates and incorporates by reference, as though fully set forth
19 herein, the allegations contained in each of the paragraphs above.

20 151. Rob Kardashian violated Ms. White’s right to privacy by intentionally
21 distributing private sexually explicit materials of Ms. White when he posted her private nude
22 photographs on multiple social media platforms on or around July 5, 2017.

23 152. At all times relevant, Ms. White did not consent to the Rob Kardashian’s
24 distribution of her private nude photos that revealed her genitals, buttocks, and nipples.

25 153. Rob Kardashian knew that Ms. White had a reasonable expectation that her nude
26 photos would remain private.

1 154. The nude photos of Ms. White that Rob Kardashian distributed online on or
2 around July 5, 2017, exposed Ms. White's intimate body parts, including her genitals, buttocks,
3 and nipples.

4 155. Rob Kardashian's distribution of Ms. White's private nude photos caused Ms.
5 White to suffer emotional distress, harm to her reputation, including shame, mortification and
6 hurt feelings as well as harm to her property, business, profession, and occupation.

7 156. Defendant's distribution of Ms. White's nude photos online was a substantial
8 factor in causing Ms. White's harm.

9 157. By engaging in the conduct as hereinabove alleged, Defendant Rob Kardashian
10 acted with malice, fraud, and oppression and/or conscious disregard of Ms. White's rights, and
11 well-being, and intended to subject Ms. White to unjust hardship thereby warranting an
12 assessment of punitive damages in an amount sufficient to punish Defendant and deter others
13 from engaging in similar conduct.

14 158. As a direct and proximate result of Defendant Rob Kardashian's conduct, as
15 alleged herein, Ms. White has suffered, and will continue to suffer the damages herein
16 mentioned, in an amount according to proof at trial.

17 **FOURTH CAUSE OF ACTION**

18 **(VIOLATION OF CAL. CIV. CODE § 1708.6—DOMESTIC VIOLENCE)**

19 **(as Against Defendant Rob Kardashian)**

20 159. Ms. White restates and incorporates by reference, as though fully set forth
21 herein, the allegations contained in each of the paragraphs above.

22 160. Rob Kardashian intentionally and recklessly caused bodily injury or attempted to
23 cause bodily injury to Ms. White, or placed Ms. White in reasonable apprehension of imminent
24 bodily harm.

25 161. The infliction of such injury to Ms. White, as set forth above, occurred after Ms.
26 White ended her intimate relationship with Rob Kardashian.

162. On information and belief, Ms. White alleges that unless Rob Kardashian is restrained by permanent injunction he will continue to harass, attack, threaten, assault, molest, disturb the peace of Ms. White, and cause her further injury and harm.

163. Ms. White has no adequate remedy at law because monetary damages alone, which may compensate for past violence or threats of violence, will not afford adequate relief for the fear, humiliation, and risk of serious injury or death that a continuation of Rob Kardashian's conduct in denial of Ms. White's rights will cause.

164. By engaging in the conduct as hereinabove alleged, Defendant Rob Kardashian acted with malice, fraud, and oppression and/or conscious disregard of Ms. White's rights, and well-being, and intended to subject Ms. White to unjust hardship thereby warranting an assessment of punitive damages in an amount sufficient to punish Defendant and deter others from engaging in similar conduct.

165. As a direct and proximate result of Defendant Rob Kardashian's conduct, as alleged herein, Ms. White has suffered, and will continue to suffer the damages herein mentioned, in an amount according to proof, including attorneys' fees and costs.

FIFTH CAUSE OF ACTION

(VIOLATION OF CAL. CODE CIV PROC. § 527.6—CIVIL HARASSMENT)

(as Against Defendant Rob Kardashian)

166. Ms. White restates and incorporates by reference, as though fully set forth herein, the allegations contained in each of the paragraphs above.

167. Rob Kardashian's harassment of Ms. White, as described above, was a knowing and willful course of conduct directed specifically at Ms. White that seriously alarmed, annoyed, or harassed Ms. White and that served no legitimate purpose, thus constituting civil harassment under California Code of Civil Procedure section 527.6.

168. Rob Kardashian's course of conduct in relentlessly texting, emailing, and calling Ms. White in an effort to harass her would cause a reasonable person to suffer substantial emotional distress, and actually did cause Ms. White to suffer substantial emotional distress.

169. Rob Kardashian's constant verbal abuse and harassment over text, email, and phone were a substantial factor in causing Ms. White's severe emotional distress.

170. As a result of Defendant's harassment, Ms. White has suffered emotional distress, ridicule, as well as loss of income and career benefits.

171. Rob Kardashian's conduct will continue to cause great and irreparable injury to Ms. White, who has no adequate remedy at law for the injuries that she is currently suffering and will continue to suffer as a result of Defendant's harassment. Accordingly, injunctive relief is necessary and proper.

172. Pursuant to California Code of Civil Procedure section 627.6(r), Ms. White is entitled to an award of the attorney's fees she incurs in prosecuting this action and seeking an injunction pursuant to Section 527.6.

173. As a direct and proximate result of Rob Kardashian's conduct, as alleged herein, Ms. White has suffered, and will continue to suffer the damages herein mentioned, in an amount according to proof, including attorneys' fees and costs.

SIXTH CAUSE OF ACTION
(INTRUSION INTO PRIVATE AFFAIRS)
(as Against Defendant Rob Kardashian)

174. Ms. White restates and incorporates by reference, as though fully set forth herein, the allegations contained in each of the paragraphs above.

175. Rob Kardashian violated Ms. White’s right to privacy on or around July 5, 2017, when he posted several private nude photos of her and publicized Ms. White’s personal medical information, including surgeries she allegedly underwent.

176. At all times relevant, Ms. White had a reasonable expectation of privacy in her private nude photos including photos of her genitals, buttocks, and nipples. Ms. White also had a reasonable expectation of privacy in her private photos taken while she was preparing for surgery, and her personal medical information, including surgeries she allegedly underwent.

1 177. Rob Kardashian intentionally intruded into Ms. White's private affairs when he
2 posted private nude photos of Ms. White, including photos of her genitals, buttocks, and nipples
3 on or around July 5, 2017.

4 178. Defendant also intentionally intruded into Ms. White's private affairs by
5 publishing private photos of Ms. White while she was preparing for surgery and revealing
6 personal medical information about Ms. White on or around July 5, 2017.

7 179. Rob Kardashian's intrusion would be highly offensive to a reasonable person in
8 Ms. White's position as he published Ms. White's private nude photos and personal medical
9 information in an effort to destroy Ms. White's reputation.

10 180. Upon information and belief, Rob Kardashian's wrongful conduct was a
11 substantial factor in causing Ms. White's harm, including, but not limited to, harm to Ms.
12 White's trade, profession, and/or occupation, and harm to Ms. White's reputation.

13 181. By engaging in the conduct as hereinabove alleged, Defendant Rob Kardashian
14 acted with malice, fraud, and oppression and/or conscious disregard of Ms. White's rights, and
15 well-being, and intended to subject Ms. White to unjust hardship thereby warranting an
16 assessment of punitive damages in an amount sufficient to punish Defendant and deter others
17 from engaging in similar conduct.

18 182. As a direct and proximate result of Rob Kardashian's conduct, as alleged herein,
19 Ms. White has suffered, and will continue to suffer the damages herein mentioned, in an
20 amount according to proof at trial.

21 **SEVENTH CAUSE OF ACTION**

22 **(FALSE LIGHT)**

23 **(as Against All Defendants)**

24 183. Ms. White restates and incorporates by reference, as though fully set forth
25 herein, the allegations contained in each of the paragraphs above.

26 184. Rob Kardashian's social media rant on or around July 5, 2017, contain numerous
27 false implications about Ms. White, including without limitation:
28

- a. that Ms. White and Rob Kardashian were in a romantic relationship as late as July 2017;
- b. that Ms. White had recently cheated on Rob Kardashian;
- c. that Ms. White had her “baby out of spite”; and
- d. that Ms. White withheld her daughter from seeing Rob Kardashian.

185. Further, Defendants made false statements about Ms. White, including that she “left Dream at home this weekend while she left to party, and [Rob Kardashian] wants to make sure there are enough nannies to protect [Dream]” on or around September 15, 2017.

186. The unfair and inaccurate depictions of Ms. White, and the false impressions and implications created by Rob Kardashian’s social media rant on or around July 5, 2017 and Defendants’ subsequent conduct, are highly offensive to a reasonable person of ordinary sensibilities in Ms. White’s position.

187. Upon information and belief, members of the community understood that Defendants’ statements were about Ms. White as the statements were about, concerning, and mentioned Ms. White expressly. These false statements about Ms. White had a natural tendency to injure Ms. White’s reputation in the entertainment industry in which she works, and with the public worldwide.

188. Defendants published these false statements about Ms. White knowing that they contained unfair and inaccurate depictions of Ms. White, and false implications that would damage Ms. White’s reputation in the community.

189. Upon information and belief, Defendants’ wrongful conduct was a substantial factor in causing Ms. White’s harm, including but not limited to harm to Ms. White’s trade, profession, and/or occupation, and harm to Ms. White’s reputation.

190. As a direct and proximate result of the above-described statements and depictions, Ms. White has suffered and will continue to suffer emotional distress, loss to her reputation, shame, mortification, and hurt feelings, and has been, and continues to be, embarrassed and humiliated by the false statements and implications and reasonable fear that she will be shunned, avoided, and subjected to ridicule.

191. By engaging in the conduct as hereinabove alleged, Defendants acted with malice, fraud, and oppression and/or conscious disregard of Ms. White's rights, and well-being, and intended to subject Ms. White to unjust hardship thereby warranting an assessment of punitive damages in an amount sufficient to punish Defendants and deter others from engaging in similar conduct.

192. As a direct and proximate result of Defendants' conduct, as alleged herein, Ms. White has suffered, and will continue to suffer the damages herein mentioned, in an amount according to proof at trial.

EIGHTH CAUSE OF ACTION
(PUBLIC DISCLOSURE OF PRIVATE FACTS)
(as Against Defendant Rob Kardashian)

193. Ms. White restates and incorporates by reference, as though fully set forth herein, the allegations contained in each of the paragraphs above.

194. Rob Kardashian violated Ms. White's right to privacy by posting several private nude photos of Ms. White on multiple social media platforms on or around July 5, 2017.

195. Moreover, on or around July 5, 2017, Rob Kardashian also published private medical information about Ms. White and posted photos of her while she was preparing for surgery.

196. Rob Kardashian publicized private information concerning Ms. White to millions of people on multiple social media platforms and the world when he publicly attacked Ms. White during his vile social media rant on or around July 5, 2017.

197. A reasonable person in Ms. White's position would consider the publicity of her private nude photos and personal medical information highly offensive.

198. At all times relevant, Rob Kardashian did not have Ms. White's consent to post her private nude photos nor her personal medical information including, but not limited to, any previous surgeries she may have undergone.

199. Rob Kardashian knew, or acted with reckless disregard of the fact, that a reasonable person in Ms. White's position would consider the publicity of her private nude photos and personal medical information highly offensive.

200. The private nude photos and personal medical information of Ms. White that Rob Kardashian posted on social media was not of legitimate public concern as such information was entirely devoid of all social value.

201. As a direct and proximate result of Rob Kardashian's wrongful conduct, Ms. White was harmed.

202. Rob Kardashian's conduct in publicizing Ms. White's private nude photos and personal medical information was a substantial factor in causing Ms. White's harm, including emotional distress, harm to her reputation, and harm to her property, business, profession, or occupation.

203. By engaging in the conduct as hereinabove alleged, Defendant Rob Kardashian acted with malice, fraud, and oppression and/or conscious disregard of Ms. White's rights, and well-being, and intended to subject Ms. White to unjust hardship thereby warranting an assessment of punitive damages in an amount sufficient to punish Defendant and deter others from engaging in similar conduct.

204. As a direct and proximate result of Defendants' conduct, as alleged herein, Ms. White has suffered, and will continue to suffer the damages herein mentioned, in an amount according to proof at trial.

NINTH CAUSE OF ACTION

(DEFAMATION: LIBEL)

(as Against Defendant Robert Kardashian)

205. Ms. White restates and incorporates by reference, as though fully set forth herein, the allegations contained in each of the paragraphs above.

206. On or around July 5, 2017, Rob Kardashian made numerous false statements of fact about Ms. White to millions of people other than Ms. White on various social media

platforms. Rob Kardashian falsely announced to his millions of social media followers that Ms. White cheated on Defendant, had her “baby out of spite.”

207. On or around July 5, 2017, Rob Kardashian also falsely implied that he and Ms. White were in a relationship as late as July 2017 and posted that she “got caught cheating.”

208. On or around July 5, 2017, Rob Kardashian also falsely claimed that Ms. White kept him from seeing their 8-month-old daughter and said, “bring Dream back to her Dad please . . . she has the guard gate not letting me in the gate either. I just miss baby Dream.” In doing so, Defendant created a meme entitled “How The Chyna stole Christmas!” which Defendant designed to falsely state that Ms. White was withholding their daughter from seeing her father—despite the fact that Rob Kardashian wrongfully withheld Dream from her mother on July 6, 2017 when she was originally scheduled to be returned to Ms. White. In reality, Rob Kardashian did not return the baby to Ms. White until July 7, 2017.

209. At all times relevant, Rob Kardashian’s social media posts made on or around July 5, 2017, were false and exposed Ms. White to hatred, contempt, ridicule, or shame. Rob Kardashian’s false statements also caused her to be shunned or despised by those who hear and/or viewed such comments on social media and the various news publications that continue repost Defendant’s false and vile statements about Ms. White made on or around July 5, 2017.

210. Rob Kardashian also falsely implied that he was currently in a romantic relationship with Ms. White on or around July 5, 2017. However, Rob Kardashian and Ms. White have not been a couple since December 2016, despite tabloid speculation otherwise. During his social media rant, Defendant intentionally deceived his millions of social media followers and the world when he falsely implied he and Ms. White had been a couple up until July 5, 2017, so as to further fuel public hatred of Ms. White.

211. Further, Rob Kardashian, his family, and/or their respective agents made false statements about Ms. White to the press, including that she “left Dream at home this weekend while she left to party, and [Rob Kardashian] wants to make sure there are enough nannies to protect [Dream].”

212. Defendants either knew that his written statements were false or they failed to use reasonable care to determine the truth or falsity of his statements.

213. Defendants' false statements caused Ms. White to suffer emotional distress, harm to her reputation, and harm to her property, business, profession, or occupation.

214. By engaging in the conduct as hereinabove alleged, Defendant Rob Kardashian acted with malice, fraud, and oppression and/or conscious disregard of Ms. White's rights, and well-being, and intended to subject Ms. White to unjust hardship thereby warranting an assessment of punitive damages in an amount sufficient to punish Defendant and deter others from engaging in similar conduct.

215. As a direct and proximate result of Defendants' conduct, as alleged herein, Ms. White has suffered, and will continue to suffer the damages herein mentioned, in an amount according to proof at trial.

TENTH CAUSE OF ACTION

(INTENTIONAL INTERFERENCE WITH CONTRACTUAL RELATIONS)

(as Against Defendants Kris Jenner, Kim Kardashian, Khloe Kardashian, Kourtney
Kardashian, Kendall Jenner, and Kylie Jenner)

216. Ms. White restates and incorporates by reference, as though fully set forth herein, the allegations contained in each of the paragraphs above.

217. Beginning on May 26, 2016, Ms. White had a valid Talent Agreement with E! Media Productions, LLC, to star in the series “Rob & Chyna” with her then-fiancé Rob Kardashian.

218. At all times relevant, Defendants Kris Jenner, Kim Kardashian, Khloe Kardashian, Kourtney Kardashian, Kendall Jenner, and Kylie Jenner (hereinafter collectively “Defendants”) knew of the existence of a valid Talent Agreement between Ms. White and E! Media Productions, LLC (hereinafter “the E! Network”) as alleged herein.

219. However, despite their knowledge of Ms. White's Talent Agreement with the E! Network, in or around February or March 2017, Defendants intentionally interfered with the Talent Agreement between the E! Network and Ms. White. During Ms. White and Rob

1 Kardashian's ongoing negotiations with these third parties regarding a second season of their hit
2 television show "Rob & Chyna," the Defendants demanded that the E! network not renew the
3 hit show for a second season. As a result of Defendants' intentional interference with Ms.
4 White's contractual relationship with E! Media Productions, the network had no choice but to
5 shut down production on the second season of "Rob & Chyna."

6 220. Defendants' conduct alleged herein prevented performance and/or made
7 performance of Ms. White's Talent Agreement more difficult.

8 221. On information and belief, Ms. White alleges that Defendants intentionally
9 interfered with Ms. White's Talent Agreement with the E! network.

10 222. After Defendants' intentional interference in demanding the network not renew
11 the Talent Agreement, Ms. White was harmed personally, professionally, and financially.

12 223. Defendants' conduct herein alleged was a substantial factor in causing Ms.
13 White's harm.

14 224. By engaging in the conduct as hereinabove alleged, Defendants acted with
15 malice, fraud, and oppression and/or conscious disregard of Ms. White's rights, and well-being,
16 and intended to subject Ms. White to unjust hardship thereby warranting an assessment of
17 punitive damages in an amount sufficient to punish Defendants and deter others from engaging
18 in similar conduct.

19 225. As a direct and proximate result of Defendants Kris Jenner, Kim Kardashian,
20 Khloe Kardashian, Kourtney Kardashian, Kendall Jenner, and Kylie Jenner's conduct, as
21 alleged herein, Ms. White has suffered, and will continue to suffer the damages herein
22 mentioned, in an amount according to proof at trial.

23 **ELEVENTH CAUSE OF ACTION**

24 **(INTENTIONAL INTERFERENCE WITH PROSPECTIVE ECONOMIC**
25 **ADVANTAGE)**

26 **(as Against All Defendants)**

27 226. Ms. White restates and incorporates by reference, as though fully set forth
28 herein, the allegations contained in each of the paragraphs above.

1 227. On information and belief, Ms. White alleges that Defendants Kris Jenner, Kim
2 Kardashian, Khloe Kardashian, Kourtney Kardashian, Kendall Jenner, and Kylie Jenner
3 intentionally interfered with an economic relationship between Ms. White and the E! network,
4 E! Media Productions, LLC, and Bunim/Murray Productions in or around February or March
5 2017.

6 228. Prior to engaging in the aforementioned conduct, Defendants were fully aware
7 that Ms. White had business relationships with the E! network, E! Media Productions, LLC, and
8 Bunim/Murray Productions, which were very likely to result in economically-advantageous
9 relationships between Ms. White, the E! network, E! Media Productions, LLC, and
10 Bunim/Murray Productions.

11 229. Defendants engaged in the conduct alleged above with the intent of interfering
12 with and/or destroying the economically-advantageous relationships between Ms. White, on the
13 one hand, and the E! network, E! Media Productions, LLC, and Bunim/Murray Productions, on
14 the other hand, and to make those relationships less financially lucrative for Ms. White.

15 230. Defendants' conduct was independently wrongful because they unlawfully
16 defamed Ms. White and/or wrongfully withheld their consent for the E! network to proceed
17 with the second season of "Rob & Chyna" in order to destroy Ms. White's career. Defendants
18 did so in order to ensure that Ms. White was unable to compete against the Kardashian-Jenner
19 women as an entrepreneur and social media influencer with television exposure. During Ms.
20 White and Rob Kardashian's ongoing negotiations with these third parties regarding a second
21 season of their hit television show "Rob & Chyna," the Defendants expressly demanded the E!
22 network not renew the hit show for a second season.

23 231. As a result of Defendants' intentional interference, production on the second
24 season of "Rob & Chyna" was shut down even though filming had already started.

25 232. At all times relevant, Ms. White, Rob Kardashian, as well as the E! network, E!
26 Media Productions, LLC, and Bunim/Murray Productions agreed to move forward with
27 production on a second season of "Rob & Chyna." In fact, during negotiations for the first
28 amendment to Ms. White's talent agreement with E! Media Productions, lawyers told Ms.

1 White and her legal team that it was solely because Defendants Kris Jenner, Kim Kardashian,
2 Khloe Kardashian, Kourtney Kardashian, Kendall Jenner, and Kylie Jenner requested that the
3 network not proceed with the second season that the network had to put a hold on production.

4 233. Moreover, his during vicious social media tirade, Defendant Rob Kardashian
5 intentionally interfered with Ms. White's prospective economic advantage as a well-known
6 social media influencer. When Rob Kardashian falsely accused Ms. White of undergoing
7 weight loss surgery to lose weight after her pregnancy, he intentionally interfered with Ms.
8 White's professional relationships with multiple health, wellness, fitness, and diet companies
9 that pay her to endorse products such as detox teas and waist trainers.

10 234. By Defendants engaging in the conduct alleged herein, they intended to disrupt
11 Ms. White's relationship with said third parties and/or knew that disruption of Ms. White's
12 relationship with said third parties was certain and/or substantially certain to occur.

13 235. As a result of Defendants' conduct, Ms. White's relationship with said third
14 parties was disrupted.

15 236. Ms. White suffered personal, professional, and financial harm as a result of
16 Defendants' intentional interference with her prospective economic advantage.

17 237. Accordingly, Defendants' conduct as alleged herein was purposeful and
18 intentional and was engaged in for the purposes of depriving Ms. White of property or legal
19 rights or otherwise causing injury, and was despicable conduct that subjected Ms. White to
20 cruel and unjust hardship in conscious disregard of its rights, and was performed with fraud,
21 oppression or malice so as to justify an award of exemplary or punitive damages against
22 Defendants in an amount according to proof at trial.

PRAYER FOR RELIEF

- A. For general and economic damages according to proof at trial;
- B. For pre-judgment and post-judgment interest according to law;
- C. For costs of suit and attorneys' fees to the fullest extent permitted by law;
- D. For punitive and exemplary damages; and
- E. For such other and further relief as the Court may deem proper.

DATED: October 17, 2017

Respectfully submitted,

THE BLOOM FIRM

By: Lisa Bloom

Lisa Bloom

A. Douglas Mastroanni

Vanessa Hooker

Attorneys for Plaintiff ANGELA WHITE