

**quinn emanuel trial lawyers | new york**

295 5th Avenue, New York, New York 10016-7103 | TEL (212) 849-7000 FAX (212) 849-7100

WRITER'S DIRECT DIAL NO.  
**(212) 849-7364**

WRITER'S EMAIL ADDRESS  
**alexspiro@quinnemanuel.com**

December 10, 2024

**VIA EMAIL AND U.S. MAIL**

**TORRES\_NYSDCAMBERS@NYS.USCOURTS.GOV**

**Honorable Analisa Torres**

Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: **Jane Doe v. Shawn Carter et al., 24-cv-07975-AT**

Dear Honorable Judge Torres:

On December 8, 2024, Plaintiff filed an amended complaint naming my client, Shawn Carter, as a defendant in this lawsuit. On December 9, 2024, we filed a motion seeking to have the court decline to permit the Plaintiff in this case to proceed anonymously. As noted in that motion, Plaintiff's attorney Anthony Buzbee has engaged in a campaign to leverage unfounded and heinous allegations against celebrities to secure large settlements. He seeks neither justice nor peace for his victims—he seeks only to benefit himself.

On the afternoon of December 9, 2024, after we had submitted the motion and accompanying exhibits, our offices received outreach via phone call and email from an individual who provided her name to us (though wishes to remain anonymous). Mari Henderson spoke to this woman, who informed Ms. Henderson that she had previously reached out to the Buzbee Law Firm with respect to allegations of trafficking and abuse unrelated to Mr. Combs (or Mr. Carter). The Buzbee firm representatives with whom she spoke asked the woman when she met “Diddy” even though her account did not relate to Mr. Combs at all. Members of the Buzbee firm encouraged this woman to pursue her claims anonymously even though she did not have any interest in doing so. When the woman raised wanting to talk to law enforcement she was informed that it was “not encouraged.” After several outreaches, the woman again spoke with members of the Buzbee firm, who she felt were pressing her to make allegations of being drugged, held down, and physically assaulted—allegations that were not true. When the woman declined to adopt the version of events proposed by members of the Buzbee firm, she was summarily dropped as a client. Though the woman provided her identity to Ms. Henderson, she wishes to remain unnamed at this time for fear of retaliation by the Buzbee firm. The information provided by this woman is in the Declaration of Mari Henderson, attached hereto as **Exhibit A**.

**quinn emanuel urquhart & sullivan, llp**

ABU DHABI | ATLANTA | AUSTIN | BEIJING | BERLIN | BOSTON | BRUSSELS | CHICAGO | DALLAS | DOHA | HAMBURG | HONG KONG | HOUSTON | LONDON | LOS ANGELES | MANNHEIM | MIAMI | MUNICH | NEUILLY-LA DEFENSE | NEW YORK | PARIS | PERTH | RIYADH | SALT LAKE CITY | SAN FRANCISCO | SEATTLE | SHANGHAI | SILICON VALLEY | SINGAPORE | STUTTGART | SYDNEY | TOKYO | WASHINGTON, DC | WILMINGTON | ZURICH

This information, which came to Quinn Emanuel unsolicited, is further evidence in support of Mr. Carter's right to thoroughly investigate, test, and respond to the spurious allegations that have been leveled against him.

We respectfully request that the Court consider this additional information, which was received by Quinn Emanuel only after the filing of yesterday's motion was complete, in connection with the motion to deny the Plaintiff's request to proceed anonymously.

Respectfully Submitted,

QUINN EMANUEL URQUHART & SULLIVAN, LLP

A handwritten signature in blue ink, appearing to read 'AS', with a long horizontal flourish extending to the right.

Alex Spiro

CC: Antigone Curis

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**Jane Doe,**

**Plaintiff,**

**v.**

**SEAN COMBS, DADDY’S HOUSE  
RECORDINGS INC., CE OPCO, LLC  
d/b/a COMBS GLOBAL f/k/a COMBS  
ENTERPRISES LLC, BAD BOY  
ENTERTAINMENT HOLDINGS, INC.,  
BAD BOY PRODUCTIONS HOLDINGS,  
INC., BAD BOY BOOKS HOLDINGS,  
INC., BAD BOY RECORDS LLC, BAD  
BOY ENTERTAINMENT LLC, BAD BOY  
PRODUCTIONS LLC,  
ORGANIZATIONAL DOES 1-10,  
INDIVIDUAL DOES 1-10, AND SHAWN  
CARTER**

**Defendants.**

24-cv-07975-AT

**DECLARATION OF MARI  
HENDERSON**

I, Mari Henderson swear, under penalty of perjury, pursuant to 28 USC 1746 as follows:

1. I am an associate with the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Shawn Carter and I submit this declaration in support of Mr. Carter’s Motion to Deny Plaintiff’s Motion to Proceed Anonymously.
2. On December 9, 2024, I spoke by telephone with a female adult resident of the State of Texas whose name is known to me. Another adult whose full name is known to me was a witness to the conversation.
3. The information contained in this Declaration is an accurate summary of the information provided to me by this woman on December 9, 2024, namely that:
  - a) In early October, 2024, this woman saw coverage of attorney Anthony Buzbee’s press conference regarding allegations of trafficking and abuse by Sean Combs, and submitted a brief outline of trafficking exploitation events via a Buzbee Law Firm website online submission form.

- b) The woman spoke with three members of Mr. Buzbee’s firm and provided details regarding her experiences as a victim of trafficking by celebrities entirely unrelated to Mr. Combs (or Mr. Carter), and she was told they would take on her representation.
  - c) After detailing her experiences to an attorney at Mr. Buzbee’s firm, he pressed for a connection to Mr. Combs, asking “at what point did you meet Diddy,” even though she made clear that her case was unrelated to Mr. Combs.
  - d) Mr. Buzbee’s firm pressed for this woman to pursue a civil case as an anonymous Doe plaintiff, even though she never raised proceeding anonymously as a possibility and questioned doing so after it was heavily suggested to remain doing so, even though she was not interested in remaining anonymous at the time.
  - e) When the woman brought up wanting to go to law enforcement with her allegations, members of the Buzbee firm informed her that going to law enforcement was “not encouraged.”
  - f) After not hearing from Mr. Buzbee’s firm for weeks, during which this woman tried to contact the firm multiple times, she spoke again with a member of the firm who pressed her to confirm false details regarding her experiences as a victim, including that she was drugged, held down, pushed, and physically assaulted. She felt directed and coached by Mr. Buzbee’s firm to say that someone held her down and put drugs in her mouth when that was not her experience. She felt forced to lie.
  - g) When the woman made clear she was unwilling to adapt to the narrative Mr. Buzbee’s firm laid out and wanted only to speak her truth, she was dropped as a client and told that Mr. Buzbee’s firm was unwilling to represent her any longer. She felt as though once she had expressed that she was not a coachable victim, she was dismissed.
  - h) This woman shared this information because she felt the conduct by Mr. Buzbee’s firm—specifically, to encourage lies—discredits those who are legitimate victims.
  - i) This woman expressed that she fears retaliation from Mr. Buzbee’s firm if she shares her true identity or signs her name to a declaration in this case at this time.
4. I declare under the penalty of perjury that the foregoing statements are true and correct. Executed in Los Angeles, California on this 10<sup>th</sup> day of December, 2024.



---

Mari Henderson