

1 Michael R. Heimbold (SBN 173981)
Dylan Ruga (SBN 235969)
2 STEPTOE & JOHNSON LLP
2121 Avenue of the Stars, Suite 900
3 Los Angeles, CA 90067-5052
Telephone: (310) 734-3228
4 Facsimile: (310) 734-3229

5 Stanton L. Stein (SBN 45997)
DREIER STEIN & KAHAN LLP
6 1620 26th Street, 6th Floor
Santa Monica, California 90404
7 Telephone: (310) 828-9050
Facsimile: (310) 828-9101

8 Attorneys for Plaintiff
9 DOMINIC SCOTT KAY

ORIGINAL FILED

JAN 25 2007

**LOS ANGELES
SUPERIOR COURT**

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12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 FOR THE COUNTY OF LOS ANGELES

14
15 DOMINIC SCOTT KAY, an individual,

16 Plaintiff,

17 vs.

18 CONROY KANTER, an individual, and

19 DOES 1 through 10, inclusive,

20 Defendants.

Case No.: _____

07V0019

**COMPLAINT FOR DECLARATORY
RELIEF**

**DEMAND FOR TRIAL
PREFERENCE**

DEMAND FOR JURY TRIAL

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22
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24 Plaintiff, DOMINIC SCOTT KAY ("KAY") hereby alleges as follows against
25 Defendant CONROY KANTER ("KANTER") and DOES 1 through 10, inclusive:

26 **INTRODUCTION**

27 1. This case is about how the dream of being a "player" in Hollywood brings
28 out the worst in people. KAY is a 10-year old boy who, despite being the voice of "Wilbur" in

1 the recently-released "Charlotte's Web," comes from a family with limited means. Over a year
2 ago, when he was just 9 years old, KAY created and directed a short film that is based on his
3 real-life events. The film stars Kevin Bacon and all proceeds from its exploitation will be
4 donated to charities. KANTER, who is believed to be in her 40's, comes from a very wealthy
5 family and aspires to be a big Hollywood producer. KANTER, presumably aware of KAY's
6 undeniable talent, virtually begged KAY to be involved with his film. KAY agreed to give
7 KANTER a "Producer" credit in exchange for approximately \$11,000 to finance the film.
8 KANTER, however, has become greedy. She now demands creative control and has threatened
9 to sue KAY (a 10-year old!) if he finishes editing the film or exploits it without her consent. As
10 a result, KAY has been forced to turn down invitations to show his film at various film festivals
11 including the Los Angeles International Short Film Festival, the Heartland Film Festival, and
12 AFI, among others.

13 THE PARTIES

14 2. At all times herein mentioned, KAY was and is an individual residing in
15 Los Angeles County, California.

16 3. KAY is informed and believes that at all times herein mentioned,
17 KANTER was and is an individual residing in Los Angeles County, California.

18 4. The identities of defendants Does 1 through 10, inclusive, presently are
19 not and cannot be known to KAY, but these individuals or entities will be added as named
20 defendants to this action as and when they are identified. Unless indicated specifically,
21 KANTER and the Doe defendants collectively will be referred to herein as "Defendants."

22 5. Each of the Defendants is or was the agent or employee of the other
23 Defendants, and/or in the alternative aided and abetted the other Defendants, and/or in the
24 alternative entered into a common conspiracy for doing the acts herein alleged and/or in the
25 alternative are somehow legally responsible for the wrongful conduct alleged herein.

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FIRST CAUSE OF ACTION

(Declaratory Relief)

(Against all Defendants)

15. KAY realleges and incorporates by this reference paragraphs 1 through 14, inclusive.

16. An actual controversy has arisen since (a) KANTER has taken the position that she is entitled to creative control over SAVING ANGELO, but KAY maintains that KANTER has no such right; and (b) KANTER asserts that she is entitled to control the exploitation of SAVING ANGELO, but it is KAY's position that he has the sole and exclusive authority to exploit the film.

17. A declaration of the parties' respective rights in relation to SAVING ANGELO is necessary and appropriate at this time so that KAY can finish editing and then exploit his film.

18. Accordingly, KAY seeks a declaration that:

(i) KANTER has no right to creative control over SAVING ANGELO; and

(ii) KANTER has no right to interfere with the exploitation of SAVING ANGELO

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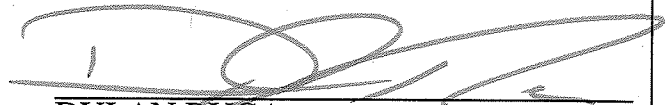
PRAYER FOR RELIEF

WHEREFORE, KAY prays for:

1. A judicial declaration that
 - A. KANTER has no right to creative control over SAVING ANGELO; and
 - B. KANTER has no right to interfere with the exploitation of SAVING ANGELO
2. All other remedies that the Court deems just and proper.

Date: January 25, 2007

STEPTOE & JOHNSON LLP
DYLAN RUGA



DYLAN RUGA
Attorney for Plaintiff
DOMINIC SCOTT KAY

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DEMAND FOR JURY TRIAL

Plaintiff Dominic Scott Kay hereby demands a trial by jury on all issues as to which a jury is available.

Date: January 25, 2007

STEPTOE & JOHNSON LLP
DYLAN RUGA



DYLAN RUGA
Attorney for Plaintiff
DOMINIC SCOTT KAY