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SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

DEC 17 2012

John A. Clarke, Executive Officer/Clerk
BY Mary Flores Deputy
Mary Flores

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT

15 KOVAC MEDIA GROUP, INC., d/b/a
16 TENTH STREET ENTERTAINMENT, a
17 California corporation; 11-7 RECORDING
18 CORP., a California corporation,

19 Plaintiffs,

20 v.

19 DINA LAPOLT, an individual; LAPOLT
20 LAW, P.C., a California professional
21 corporation; and DOES 1 through 10,
22 inclusive,

23 Defendants.

CASE NO. BC 493706

Judge: Hon. Joseph R. Kalin
Department: 50
File Date: October 11, 2012
Discovery Cutoff: TBD
Trial Date: TBD

DECLARATION OF STEVEN V.
TALLARICO P/K/A STEVEN TYLER IN
SUPPORT OF DEFENDANTS' MOTION
TO STRIKE PLAINTIFFS' COMPLAINT
PURSUANT TO CALIFORNIA CODE
OF CIVIL PROCEDURE § 425.16

Hearing Date: January 14, 2013
Time: 8:30 a.m.

1 **DECLARATION OF STEVEN V. TALLARICO P/K/A STEVEN TYLER**

2
3 I, STEVEN V. TALLARICO P/K/A STEVEN TYLER, declare as follows:
4

5 1. I have personal knowledge of the following facts and, if called and sworn as a
6 witness, could and would competently testify thereto.
7

8 2. I submit this Declaration in support of Defendants' Motion to Strike Plaintiffs'
9 Complaint Pursuant to California Code of Civil Procedure § 425.16.
10

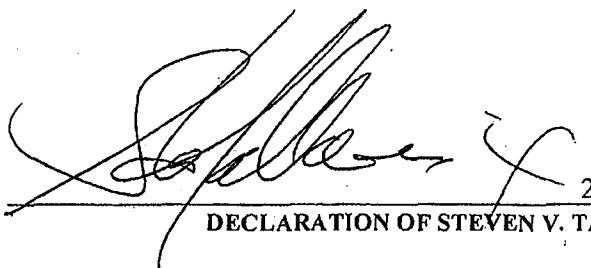
11 3. My lawyer and trusted advisor since February 2010 on entertainment matters is
12 Dina LaPolt, and her firm LaPolt Law, P.C.
13

14 4. Since then, Dina has been my advocate and ally and terrific counsel to me.
15

16 5. I know she has been sued by Allen Kovac's company regarding my management
17 relationship with him, and that is an outrage and a travesty.
18

19 6. I was under a personal management agreement with Allen Kovac's company, Tenth
20 Street Entertainment, for almost two years—from January 2010 until August 2011.
21

22 7. It is an understatement to say that I was very unhappy with the services and
23 conduct of Allen Kovac. Among other things, he was disrespectful and rude to my business
24 associates, insulted and verbally abused my fiancé, my lawyer, my family, my assistants, and my
25 accountants. I wanted very much to end the relationship.
26

27  2

28 _____
DECLARATION OF STEVEN V. TALLARICO P/K/A STEVEN TYLER

1 8. In fact, I only signed with his company in the first place because Kovac employed
2 Eric Sherman, a person I liked, and only because we agreed that Eric would be my manager—not
3 Allen.

4
5 9. Even though he agreed to stay out of things, Allen would not stop interfering in my
6 matters and business, and I wanted to fire his company.

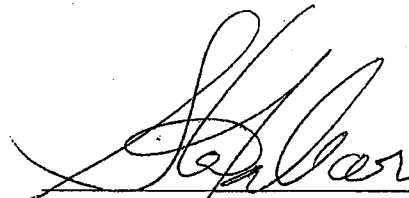
7
8 10. After a contentious period, I finally was able to end my management contract with
9 Allen Kovac's company and have any remaining commission obligations transferred entirely to
10 Eric Sherman. This was my decision after discussions with my lawyer Dina, and I instructed her
11 to proceed with a contract terminating my relationship with Kovac's company.

12
13 11. By contract, all of my obligations to pay any management commissions to Kovac's
14 company ended on August 1, 2011.

15
16 12. On that day, Allen Kovac and his company completely released me and all of my
17 representatives, lawyers, and agents, including Dina LaPolt and Eric Sherman, from any and all
18 claims relating to my management agreement.

19
20 I declare under penalty of perjury under the laws of the State of California that the
21 foregoing is true and correct.

22
23 Dated: December 7, 2012.

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26 _____
27 STEVEN V. TALLARICO p/k/a STEVEN TYLER

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California, I am over the age of eighteen years and am not a party to this action; my business address is Mitchell Silberberg & Knupp LLP, 11377 West Olympic Boulevard, Los Angeles, CA 90064-1683, and my business email address is kls@msk.com.

On December 17, 2012, I served a copy of the foregoing document(s) described as **DECLARATION OF STEVEN V. TALLARICO P/K/A STEVEN TYLER IN SUPPORT OF DEFENDANTS' SPECIAL MOTION TO STRIKE PLAINTIFFS' FIRST AMENDED COMPLAINT PURSUANT TO CALIFORNIA CODE OF CIVIL PROCEDURE § 425.16** on the interested parties in this action at their last known address as set forth below by taking the action described below:

Louis R. Miller
MILLER BARONDESS, LLP
1999 Avenue of the Stars, Suite 1000
Los Angeles, CA 90067
Tel.: (310) 552-4400
Fax: (310) 552-8400
E-Mail: smiller@millerbarondess.com

Attorneys for Plaintiffs,
KOVACS MEDIA GROUP, INC., d/b/a
TENTH STREET ENTERTAINMENT,
and 11-7 RECORDING CORP.

BY PLACING FOR COLLECTION AND MAILING: I placed the above-mentioned document(s) in sealed envelope(s) addressed as set forth above, and placed the envelope(s) for collection and mailing following ordinary business practices. I am readily familiar with the firm's practice for collection and processing of correspondence for mailing with the United States Postal Service. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at 11377 West Olympic Boulevard, Los Angeles, California 90064-1683 in the ordinary course of business.

BY ELECTRONIC MAIL: I served the above-mentioned document electronically at _____ [a.m./p.m.] on the parties listed at the email addresses above and, to the best of my knowledge, the transmission was complete and without error in that I did not receive an electronic notification to the contrary.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on December 17, 2012, at Los Angeles, California.

Kimberly Stewart