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

11 In re the Matter of  
12 Petitioner: MEL GIBSON  
13 and  
14 Respondent: OKSANA GRIGORIEVA

CASE NO. BF 039 488  
DECLARATION OF ALAN NIEROB  
JUDGE: Scott Gordon  
DEPT: 88

17 I, Alan Nierob, declare as follows:

18 1. This declaration is based upon facts within my own personal knowledge or from  
19 the contents of the documents referred to herein.

20 2. I am a publicist with Rogers & Cowan. I have been a publicist for thirty years.  
21 I make this declaration of personal, firsthand knowledge, and if called and sworn as a  
22 witness, I could and would testify competently thereto.

23 3. As a publicist, I typically represent high-profile celebrities, such as actors. I  
24 have been Mel Gibson's publicist for fifteen years.

25 4. As Mr. Gibson's publicist, I am responsible for managing the publicity in  
26 promoting Mr. Gibson's films and creative endeavors. For example, I manage his press  
27 schedules, including press tours for films in which Mr. Gibson is acting, I arrange photo  
28 shoots with Mr. Gibson, and I arrange press interviews with Mr. Gibson, among many other

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1 things.

2 5. Over the fifteen years that I have worked with Mr. Gibson, I have accompanie  
3 him on many press tours to promote his various roles in films. In my experience, press tour  
4 are very grueling for the celebrity because they require a lot of work at all hours of the da  
5 and night, include a lot of travel, and always require the celebrity to be "on" and focused o  
6 each press event. These tours are therefore not family-friendly events. For these reasons  
7 I generally discourage family members from coming on press tours. In my experience  
8 because of these grueling working conditions, Mr. Gibson usually does not travel with many  
9 other people on his press tours.

10 6. Mr. Gibson recently starred in the film Edge of Darkness. I worked with  
11 Mr. Gibson to promote this film. For example, I set up the press events and Mr. Gibson's  
12 press schedule, including media interviews and photo shoots, both in the United States and  
13 in Europe. At the end of 2009, when I initially set up the European press tour for Edge of  
14 Darkness, Mr. Gibson's then girlfriend, Oksana Grigorieva, was not scheduled to travel with  
15 Mr. Gibson on the tour.

16 7. As Mr. Gibson's publicist, I have gotten to know Ms. Grigorieva. I have also  
17 seen Ms. Grigorieva and Mr. Gibson together many times over the period that they were  
18 dating. While Ms. Grigorieva and Mr. Gibson were dating, she was often with him and never  
19 appeared to be reluctant to be in his presence. For example, I know that Ms. Grigorieva  
20 enjoyed going to press events with Mr. Gibson, such as movie premieres with walks on the  
21 red carpet and a multitude of photo opportunitles. I know this based on my observations of  
22 Ms. Grigorieva and because she repeatedly told me how much she enjoyed attending press  
23 events with Mr. Gibson. In my opinion, she enjoyed press events more than most of my  
24 clients' spouses and significant others.

25 8. I am also aware from my discussions with Ms. Grigorieva that, during this time,  
26 she was working to promote her own musical career and "visibility" in the music industry.  
27 Based on my observations as described below and my interactions with Ms. Grigorieva, I  
28 understood that Ms. Grigorieva believed that attending Mr. Gibson's public events could

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1 assist her in promoting herself and her musical career. I am also aware of a number  
2 instances following the birth of Lucia and the end of March 2010 in which Ms. Grigoriev  
3 made efforts to promote herself and her career, some of which are described below.

4 9. On January 17, 2010, Mr. Gibson presented an award at the Golden Glob  
5 Awards. I had set up this event for Mr. Gibson. Up until the event, I was unaware tha  
6 Ms. Grigorieva would be attending. Mr. Gibson was presenting toward the end of the show  
7 so I arranged for him come late and enter through the back entrance, so that he would be  
8 there for only a very short time period and not have to wait around. When I met Mr. Gibsor  
9 at the show, I was surprised to see that Ms. Grigorieva was with him. I was surprised  
10 because I had not known that she was coming and because it was such a short event, it was  
11 odd that she would be there. After the show, Mr. Gibson and Ms. Grigorieva then went out  
12 to dinner, and were photographed by the paparazzi. A true and correct copy of a printout  
13 from TMZ.com's Website showing Mr. Gibson and Ms. Grigorieva going out to dinner on  
14 January 17, 2010, is attached hereto as Exhibit A.

15 10. As part of the publicity for Edge of Darkness, Mr. Gibson was on several  
16 national television shows to promote the film. For example, on January 27, 2010, the day  
17 after the film premiered in Los Angeles, Mr. Gibson taped an interview for Jimmy Kimmel  
18 Live!. In my experience, tapings of shows, as opposed to live shows, can go on for several  
19 hours and there is a lot of time where the interviewee is waiting around. Because of this  
20 drawn out time frame, interviewees typically do not bring guests with them to a taped show.  
21 Ms. Grigorieva, however, came to this press event with Mr. Gibson.

22 11. After the taping, my girlfriend and I took Ms. Grigorieva and Mr. Gibson out to  
23 dinner at an upscale restaurant in West Hollywood, California. During our dinner,  
24 Ms. Grigorieva was laughing and joking, and appeared to be extremely happy to be in  
25 Mr. Gibson's presence and it was apparent to me that she was in love with him. It was the  
26 first time my girlfriend had met Ms. Grigorieva and after dinner my girlfriend commented to  
27 me that she believed they were a very sweet couple together.

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1 12. On or around the week after Ms. Grigorieva gave birth to Mr. Gibson's ar  
2 Ms. Grigorieva's daughter, Lucia, in November, 2009, I stopped by the house where  
3 Ms. Grigorieva was staying to see her and the new baby. While I was visiting with  
4 Ms. Grigorieva, she stated that she would like to go on the European press tour for Edge of  
5 Darkness. Ms. Grigorieva asked whether there would be opportunities to attend movie  
6 premieres and to be photographed on the red carpet. While I informed her that there would  
7 be such opportunities, I tried to discourage her from attending the European press tour  
8 given the grueling nature of press tours, the travel abroad and the fact that she had a  
9 newborn baby. Additionally, I told Ms. Grigorieva that I believed this was a very important  
10 tour for Mr. Gibson, who had not acted in a film in almost eight years, which needed his  
11 undivided focus and attention.

12 13. Mr. Gibson was scheduled to depart for his European press tour to promote  
13 Edge of Darkness on January 30, 2010. On or around the beginning of January, 2010, I  
14 spoke with Mr. Gibson's assistant to confirm the passport numbers of the people who would  
15 be travelling with Mr. Gibson. Around this time, Mr. Gibson informed me that Ms. Grigorieva  
16 wanted to come on the tour and he had agreed that she could come.

17 14. As Mr. Gibson's publicist, I was concerned that Ms. Grigorieva's presence  
18 would distract Mr. Gibson from the grueling work he had to do on this tour. The purpose of  
19 the tour was to aggressively promote the film, this was not a pleasure trip for Mr. Gibson.  
20 I did not believe it was in the best interest of the project, and, therefore, Mr. Gibson, for him  
21 to have the added responsibility of travelling with Ms. Grigorieva on this, his first press tour  
22 for a film he was acting in eight years. Ms. Grigorieva, however, insisted on going on the  
23 tour. Ultimately, she was added to the tour based on her insistence on being present.

24 15. Thereafter, about two weeks before Mr. Gibson's departure, on or around  
25 January 15, 2010, I called Ms. Grigorieva to confirm her passport number. At this time, I  
26 advised her that she should reconsider coming on the press tour, given the grueling nature  
27 of the trip, the purpose of the tour and that she had just had a new baby. She insisted on  
28 coming despite my concerns.

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1 16. Ms. Grigorieva attended the European press tour and brought along Lucia, to  
2 During the trip, both Mr. Gibson and Ms. Grigorieva took care of Lucia, and they had a nanr  
3 as well. Both at this time and on a multitude of other occasions, Ms. Grigorieva commente  
4 to me that she believed Mr. Gibson was a "great" father to Lucia.

5 17. During the press tour, Mr. Gibson and Ms. Grigorieva attended many pres  
6 events together, including film premieres. A true and correct copy of printouts from  
7 zimbio.com showing Mr. Gibson and Ms. Grigorieva attending the premiere in Madrid, Spair  
8 is attached hereto as Exhibit B. The couple was extensively covered by the local media, too  
9 During the press tour, Ms. Grigorieva and Mr. Gibson stayed in the same hotel room together  
10 and, to the extent they had any free time, they spent time alone together and with Lucia.  
11 Ms. Grigorieva and Mr. Gibson returned home from the tour on or around February 5, 2010.

12 18. While working with Mr. Gibson, I also noticed that he made a lot of effort to  
13 assist Ms. Grigorieva's musical career and put a huge amount of money into her career  
14 development. For example, in my opinion, he worked very hard to put her song in the credits  
15 of Edge of Darkness. During the film's premiere in Los Angeles on January 26, 2010, he  
16 made the audience stay to watch the credits so that they could hear Ms. Grigorieva's song,  
17 as he informed me he "wanted her to have her moment." I never saw Ms. Grigorieva decline  
18 Mr. Gibson's career assistance. A true and correct copy of printouts from zimbio.com of  
19 pictures showing Mr. Gibson and Ms. Grigorieva attending the premiere are attached hereto  
20 as Exhibit C.

21 19. A colleague of mine at Rogers & Cowan set up an interview of Ms. Grigorieva  
22 on the entertainment magazine program Extra to take place on or around February 18, 2010.  
23 Attached as Exhibit D hereto is a true and correct copy of a printout from Extra's Web site  
24 discussing the interview. Based on my conversations with Ms. Grigorieva, I understood that  
25 she was very excited about going on national television. During this interview,  
26 Ms. Grigorieva discussed her song being in the credits for Edge of Darkness and announced  
27 that she would be scoring Mr. Gibson's next movie. Ms. Grigorieva agreed with the  
28 interviewer that this was "big news."

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1 20. I along with my colleague Maureen O'Connor set up events for Ms. Grigorieva  
2 at her request, to promote herself and her musical career. Mr. Gibson paid for the publicity  
3 services of Rogers & Cowan's music department for Ms. Grigorieva. For example, right after  
4 Lucia was born, Ms. O'Connor set up an interview and photo shoot with Ms. Grigorieva and  
5 Hello magazine. I also set up an interview with Ms. Grigorieva on Good Morning America.

6 21. I understand that Ms. Grigorieva went to Russia and Europe in or around April,  
7 2010. Prior to her leaving, Ms. O'Connor informed me that Ms. Grigorieva had repeatedly  
8 asked Ms. O'Connor to set up press events for Ms. Grigorieva while she was abroad. I  
9 understand that Ms. O'Connor could not set up press interviews due to lack of interest. On  
10 April 26, 2010, Ms. O'Connor put out a press release concerning Ms. Grigorieva's trip to  
11 Russia is attached as Exhibit E. I understand that Ms. Grigorieva held a press conference  
12 while in Russia, too. Attached as Exhibit F is a true and correct printout from cnn.com  
13 discussing the press conference.

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

16 Executed on June \_\_\_, 2010, at Los Angeles, California.

17  
18 {SIGNATURE ON ATTACHED PAGE}  
19 Alan Nierob

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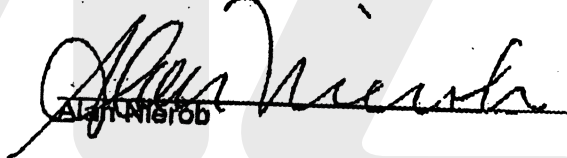
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14 I declare under penalty of perjury under the laws of the State of California that the  
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16 Executed on June 24, 2010, at Los Angeles, California.

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