

1 Enforcement Officials, the defense of “consenting adults” is unavailable under the above  
2 U.S. Supreme Court decisional law inasmuch as is explained herein, the cable-casting of videotapes  
3 and motion picture films, which are identified by name and computerized **Time and Motion Study**  
4 analysis as *malum in se* “hard-core” pornography under Federal Law and International Treaty is  
5 felonious conduct and is an impermissible business practice in the State of California as a matter of  
6 law.

7       **48.** Plaintiff contends that this moral dilemma (i.e., “desuetude”) presented a “crisis”  
8 which warranted the filing of an Original Petition under **U.S. Supreme Court Rule 20(1)** to  
9 ascertain the correct rule of law re “consenting adults”. This Nation cannot function in the “moral  
10 sense” without knowing what the correct Rule of Law is. The 50 States of this “Union” need to  
11 know now what the Natural Law requires and cannot afford the luxury of additional years of  
12 Appellate uncertainty. In this Plaintiffs view, the facts as pleaded warrant an exercise of the  
13 U.S. Supreme Court’s Appellate Jurisdiction (see **Supreme Court Practice**, 7<sup>TH</sup> Edition, at  
14 Chapter 11, “Extraordinary Writs” at paragraphs 1 and 2 on page 492, and *Alyeska Pipeline Serv.*  
15 *v. Wilderness Soc.*, 421 U.S. 240, 44 L.Ed.2d 141, 95 S.Ct. 1612 (1975). Unfortunately for this  
16 Nation, the U.S Supreme Court has not yet agreed with Petitioner/ Declarant. In the long run they  
17 must, under the existing precedents which this Private Attorney General has cited in the above  
18 Declaration.

19       **49.** Having failed thus far to motivate the U S Supreme Court to exercise its Original  
20 Jurisdiction in aid of its Appellate Jurisdiction, and decide the “Trial Court” issues which are framed  
21 by *In Re Cluncy, et al.*, No. 01;       October Term 2001, Petitioner/ Declarant has joined the San  
22 Fernando Valley Movement of Secession from the City of Los Angeles, which is a ballot issue on  
23 the November 5, 2002 ballot to make the San Fernando Valley a separate California City, which is  
24 independent of the City of Los Angeles, and under the control of its own City Council and City  
25 Attorney, with its own power to abate **A.T.&T.** as a moral public nuisance. As a Candidate for the  
26 City Council for the potential Fifth District of the new City. Petitioner is attempting to obtain the  
27 commitment of other potential Council Members (if elected and installed) to a campaign by the City  
28 Council upon Secession to rid the San Fernando Vallev of the **A.T.&T.** unlawful business operation

1 is a moral public nuisance. together with the multitude of other similar sex-oriented moral public  
2 nuisances which the City Council and the City Attorney of the City of Los Angeles has allowed to  
3 load the Valley in recent years, with a recoupment of the unlawful profits derived by *A.T.&T.*  
4 during the 23 Months of its unlawful business activity, and the City's costs of abatement which  
5 includes an attorney's fee.

6  
7 **THE U.S. SUPREME COURT IS DIRECTLY RESPONSIBLE FOR THE**  
8 **CREATION AND EXISTENCE OF THIS MORAL CABLE TELEVISION**  
9 **DILEMMA WHEREIN THE STATE AND NATIONAL MORALITY**  
10 **STATUTES HAVE FALLEN INTO DESUETUDE. PLAINTIFF CONTENDS**  
11 **THAT "AS THE FIRST ORDER OF BUSINESS", THIS TRIAL COURT**  
12 **SHOULD NOW HEAR ARGUMENT ON TWO JURISDICTIONAL**  
13 **QUESTIONS: (1) WHETHER THIS COURT HAS A RIGHT TO CLOSE**  
14 **DOWN A.T.&T.'S UNLAWFUL BUSINESS ACTIVITY WHICH IS**  
15 **REGULARLY AND EXCLUSIVELY TRADING IN HARD-CORE**  
16 **PORNOGRAPHY; AND (2) WHETHER CONSENTING ADULTS MAY**  
17 **ENGAGE IN SUCH UNLAWFUL BUSINESS PRACTICE ON ANALOGUE**  
18 **CABLE 96 AND DIGITAL CABLE CHANNELS 457 AND 459 IN THE FACE**  
19 **OF THIS LEGAL CHALLENGE BY THIS PRIVATE ATTORNEY**  
20 **GENERAL.**

21 50. The suggestion by *Playboy Enterprises, Znc.*, that this Nation is ready to abandon its  
22 Natural Law roots and accept hard-core pornography as its contemporary community standard is  
23 patently absurd. The historical courtroom record of the Orange County, California, civil litigation  
24 in *People. ex rel. Gow v. Mitchell Brothers' Santa Ana Theater*, gen. rf. supra, at paragraph 25 on  
25 pages 13-14, establishes the contrary. The responsibility for this mistaken belief lies directly with  
26 the membership of the U.S. Supreme Court, which wrongfully (in derogation of their Constitutional  
27 responsibilities) refused to decide the "closure" issue in the *Mitchell Brothers' Santa Ana Theater*  
28 litigation in the U.S. Supreme Court October Term, No. 82-345, and in other litigation. This Trial  
Court is requested to take Judicial Notice of Plaintiffs Petition for Writ of Certiorari in the  
U.S. Supreme Court, No. 82-345, and Plaintiffs analysis of this phenomenon at "page 6" in his  
November 24, 1999 letter to William Huston at "Appendix A" to his first Pleading in the  
U.S. Supreme Court, filed on or about January 4, 2002. See copy at "Exhibit 1 to this Complaint"  
(5 Pleadings in the U.S. Supreme Court).

51. As the primary ground for filing this civil action, Plaintiff asserts the lawful right and



1 nuisances” involving the exhibition of such indecent public sexual conduct. The first remedy  
2 addresses the moral public nuisance by criminally penalizing and/or civilly enjoining the commission  
3 of the underlying indecent sexual “act” in public, see Sir Charles Sedley’s Case, 83 Eng.Rep. 1146  
4 K.B., 1663). The second remedy, the civil and criminal prosecution of the obscene libel, came into  
5 being years after the “lewd public act” remedy had been forged, and established an additional  
6 proscription against the manufacture, distribution, public exhibition, etc., of that which was  
7 determined to be an obscene book, motion picture film, videotape, etc., in relation to the definition  
8 set forth in the State and Federal “Obscenity Statutes” (as an alternative remedy to focusing upon  
9 the underlying “sexual act”)

10 **54.** Under the **Common Law of England**, (which is our Judaeo-Christian Heritage), the  
11 mating “act” was private, and was fiercely protected as such. For example, to “mate” a mare and  
12 stallion in public was a **Common Law** crime and to exploit that act for public entertainment was  
13 indictable as such. as a “moral public nuisance”<sup>14/</sup>. That **Common Law** concept was carried over  
14 and adopted into California law by the California Legislature. See **Civil Code §5** and **Civil Code**  
15 **522.2** which provides:

16 **“Civil Code §5. Provisions similar to existing laws, how construed**

17 The provisions of this code, so far as they are substantially the same as existing  
18 statutes or the common law, must be construed as continuations thereof, and not as new  
19 enactments.”

20 **“Civil Code 622.2. [Common law. when rule of decision]**

21 The common law of England, so far as it is not repugnant to or inconsistent with the  
22 Constitution of the United States, or the Constitution or laws of this State, is the rule of  
23 decision in all the courts of this State.”

24 **55.** Plaintiff herein requests a judgment which will grant him both civil remedies. In  
25 pleading by incorporation the indecent “sexual acts” which are embodied in such computerized **Time**  
26 **and Motion (T/M) Studies**, Plaintiff is asking for injunctive relief which requires that the “indecent  
27 sexual acts” which are “captured” and “pleaded” by such “photos” be excised from the videotape  
28 itself as the exhibition of “indecent sexual acts in public”, and that all monies which have been  
29 derived from such unlawful exhibitions be forfeited to the State pursuant to traditional equitable

30 <sup>14/</sup> Note, here, the “commonality” of the assuagement of the “appeal to the prurient interest” during the  
31 “Restoration Period.

1 'forfeiture' principles. In addition, Plaintiff also seeks that which must, of necessity, follow  
2 therefrom, i.e., a civil determination and Summary Judgment on the Pleadings from this Court, that  
3 the videotapes which are before this Court are hard-core pornography under Federal Law and are  
4 forfeit to the State and Federal Government, as State and Federal Public Nuisances under: **(1)** the  
5 State and Federal Obscenity Statutes, and **(2)** the International Agreement to repress Obscenity  
6 (Remedy 2).

7 **56.** The two issues which are drawn in this Civil Complaint are the same issues which  
8 were brought before the U.S. Supreme Court in a "Motion to Affirm" in the Appeal of *A Motion*  
9 *Picture Entitled "Vixen" v. Ohio ex rel. Keating*, No. 71-599, October Term, 1971. See copy at  
10 "Exhibit F" to Petitioner's letter to Cardinal Roger Mahoney, dated May 15, 2001. At that time, the  
11 necessary number of U.S. Supreme Court Justices refused to note Jurisdiction of the "Appeal" of  
12 Appellant *Vixen* from the Ohio Supreme Court Judgment which granted both forms of relief. For  
13 this reason. Plaintiff, in pleading his statement of facts in this request for an original extraordinary  
14 writ of mandamus, pleads the Cardinal Mahony May 15, 2001 letter "Exhibits" by reference and  
15 incorporation (and as an example) at "**Exhibit 4** to this Complaint" (see at **Appendix F**), a copy of  
16 the "Motion to Affirm" in the 1971. October Term *Vixen* case. so that the Trial Court can take  
17 Judicial Notice of the fact that the Plaintiffs Petition for an extra-ordinary writ of mandamus. herein,  
18 embraces the "twin" remedies which are available where there is a proof of both of the above-types  
19 of public nuisances, i.e., one based upon indecent sexual conduct, pursuant to the *Sir Charles Sedley*  
20 Statute; the other based upon the indecent "sexual acts" which are "incident" to a violation of the  
21 Obscenity Statute.

22 **57.** It therefore becomes the duty of this Court to "focus upon" the conduct of porn actor  
23 Ron Jeremy in "*More than a Handful 9*" as he addresses his *A.T.&T.* audience, and says to that  
24 audience and to this Court, immediately before beginning to engage in his lewd conduct, "You didn't  
25 think I was going to host the entire show and not get any, did ja?" See the computerized **Time and**  
26 **Motion (TIM) Study** for "*Morethan a Handful 9*" at "page 16", time (57:52-58:00) which is also  
27 pleaded in the 6 1/8 in. x 9 1/4 in. format by incorporation herein at **Appendix E-3** of "**Exhibit 1**  
28 to this Complaint" (5 Pleadings in the U.S. Supreme Court) and at **Appendix A-3** to this Complaint

1 8.5 in. x 11 in. format). That portrayal is autoutical uroof that Porn Actor Ron Jeremy has  
2 ommitted the very crime that Sir Charles Sedlev was charged with committing under the Common  
3 law in 1663 when Sedlev urinated into the English Covent Garden courtyard below and uttered his  
4 obscene speech. He is, in effect, “giving the finger” to the American System of Government,  
5 ncluding its Judiciary. Petitioner submits that A.T.&T.’s conduct must he dealt with by this Court  
6 n the same light. The scene is subject to excision under *Sir Charles Sedlev* (remedy “one”). and  
7 he film itself declared to be hard-core pornography (remedy “two”) under Federal and California  
8 law.

9 **58.** Analytically, the film “*More than a Handful* 9 itself, and other hard-core  
10 pornographic films which in general, employ the same “format” as a regular practice, are nothing  
11 more than a catalogue of *malum in se* acts of public lewdness “*Sir Charles Sedley* crimes”<sup>15/</sup> which  
12 are regularly performed by pornographic actors and actresses during the filming of what,  
13 incongruously, will he claimed by A.T.&T. (in its defense) to he a “copyrightable” (obscene) motion  
14 picture film of redeeming “social value”! See, in this regard at **Appendix F-3** to “**Exhibit 1** to this  
15 Complaint”, Associate Justice Stewart’s concurring opinion in *Jacobellis v. Ohio*, supra.

16  
17 **PETITION FOR WRIT OF MANDAMUS TO ABATE PUBLIC NUISANCES**

18 COMES NOW THE PLAINTIFF, James J. Clancy, acting as a Private Attorney General, to  
19 state the following causes of action:

20 **59.** Against the Defendant *A.T.&T. Corp.*, as New York corporation, as the owner of a  
21 City of Los Angeles Cable T.V. Franchise “D”, and the operator of the “Adults Only” “In Demand”  
22 Pay T.V. Analogue Channel 96), which has from January of 2001 to May 1,2001, daily broadcaste  
23 approximately 7.5 hours of 121 separately titled motion picture films depicting indecent sexua

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<sup>15/</sup> To establish this “proof”, Plaintiff will use a Sylvania Combination Television/ Video Recorder (13 inch screen), which permit a “clear” viewing of the 72 minute “*More Than A Handful 9*” videotape in 14 minutes at the slower of the two fast-forward speeds, as a “fast speed, silent” movie of *per se* hardcore sexual conduct.

1 conduct, in a “pandering” type operation <sup>16/</sup> (to what *A.T.&T.* contends is a “lawful” “consenting  
2 adult” audience) in violation of, City, County, State, and Federal Obscenity Ordinances and Statutes,  
3 and an International Treaty which mandates the repression of obscenity <sup>17/</sup>, and the “pandering” of  
4 obscenity.

5 **60.** On May 1, 2001, *A.T.&T.* changed its “type” of broadcasting as to Plaintiffs  
6 residence at 9055 La Tuna Canyon Road, Sun Valley, California, from “analogue” T.V. (Channel 96)  
7 to “digital” T.V. (Channels 457 and 459), and now broadcasts the same type of service from digital  
8 Channels 457 and 459, except that *A.T.&T.* now broadcasts the same type of films and “pandering”  
9 previews continuously for 24 hours around the clock and charges \$1 1.95 for each 3 hour segment  
10 [two [2]– 75 minute hard-core pornographic motion picture films with an interspaced “pandering”  
11 preview of 15 minutes duration), thereby increasing their potential revenue eight fold as to its  
12 Franchise “D” operations.

13 **61.** *The Hot Network, The Hot Zone, Vivid Video, Znc.*, and the Van Nuys, California-  
14 based *Vivid Entertainment Group* are named as Defendants and co-conspirators, as the owners and  
15 suppliers to *A.T.&T. Corp.* and Cable Channel 96 (analogue), Channel 457 (digital), and  
16 Channel 459 (digital) for a fee, of the unlawful hard-core pornographic motion picture films and  
17 tapes, each of which depict a multitude of indecent sexual acts, which by themselves violate the Sir  
18 Charles Sedley Statute.

19 **62.** *Playboy Enterprises, Znc.*, and *Christie Hefner* are named as Defendants and co-  
20 conspirators, for their ownership of a vested right and exercise of *Playboy’s* option in June/ July,  
21 2001, to purchase “*The Hot Network*”, “*The Hot Zone*” and “Vivid T.V.”, which are now being  
22 broadcast by *A.T.&T.* on its “In Demand” Pay T.V. “Adults Only” Service.

23 **63.** Both a past and the present Los Angeles City Attorney, the Los Angeles City Council,  
24 the Los Angeles County District Attorney, the Los Angeles County Counsel, the Los Angeles County  
25

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26 <sup>16/</sup> From 10:00 p.m. to approximately 5:30 a.m., *A.T.&T.* broadcast five (5) seventy five minute films and  
a total of 1.25 hours of “pandering” previews of coming attractions.

27 <sup>17/</sup>  
28 — See the copy of the 1911 U.S. Proclamation on Obscenity, as amended to date, at **Appendix F-12** to  
**Exhibit 1** to this Complaint.

1 board of Supervisors, and the U.S. Attorney General are named as Defendants for their failure and  
2 neglect to address and abate the above described State and Federal Public Nuisances (involving the  
3 depiction of indecent sexual conduct) and unlawful “adults only” business within their respective  
4 law enforcement jurisdictions, and in the face of Local, State and Federal Law. and an International  
5 Agreement which require the proscription of such unlawful businesses as moral public nuisances.

6 **64.** Plaintiff contends that in California, the resolution of this Petition regarding the  
7 ‘Adults Only’ T.V Cable Channels 96, 457 and 459 operation, which involves the issue of  
8 ‘consenting adults’, is controlled by *Roth v. US. (Roth-Alberts)*, supra, and the decision of the  
9 California Court of Appeals, 2<sup>ND</sup> Appellate District, Division 3, in *Busch, et al. v. Projection Room*  
10 *Theatre, et al.*, 118 Cal.Rptr. 428 (C.A. 2<sup>ND</sup> Dist , Div.3, December 27, 1974), hearing granted  
11 March 6, 1975 (hereinafter referred to as *Busch I*), and the California Supreme Court in *People ex*  
12 *rel. Busch v. Projection Room Theater, et al.*, 17 Cal.3d 42, 58, 130 Cal.Rptr. 328, 550 P.2d 600  
13 :Supreme Ct., June 1, 1976) (hereinafter referred to as *Busch II* <sup>18/</sup>). Both opinions and their  
14 rationales are attached as “Appendix D-6” and “Appendix D-7” of “Exhibit 1 to this Complaint”  
15 (being the January 4, 2002 pleading in the U.S Supreme Court), and are incorporated by reference  
16 in this Pleading as the controlling precedent.

17 **65.** Plaintiff has prepared this Complaint in reliance upon the law expressed in both of  
18 the above cited *Busch* decisions and the U.S. Supreme Court decisions in *Roth v. US. (Roth-*  
19 *Alberts)*, supra, and *Paris Adult Theatre I. et al. v. Slaton*, 413 U.S. 49, 37 L.Ed.2d 446, 93 S.Ct.  
20 2628 (June 21, 1973), upon which the California Supreme Court relied. In the early 1970’s, Plaintiff  
21 (Clancy) developed *Paris Adult Theatre I. et al. v. Slaton*, supra, as a test Public Nuisance  
22 Abatement lawsuit for the Solicitor General for Fulton County, Atlanta, Georgia. Hinson McAuliffe,  
23 under a 6 month contract with S/G McAuliffe When the U.S. Supreme Court wrote its 5-4 decision  
24 in *Paris Adult Theatre I. et al. v. Slaton.* supra. upholding the moral public nuisance abatement  
25 concept. it had a mechanically produced “time and motion study” of the films “*It All Comes Out in*

2 <sup>18/</sup>  
21 The first decision of the California Supreme Court, which was vacated, appears at *People ex rel. Busch*  
*v. Projection Room Theater, et al.*, 16 Cal.3d 350, 128 Cal.Rptr. 229, 546 P.2d 133 (Supreme Ct., March 4, 1976.  
vacated June 1, 1976).

1 the End’ and “Magic Mirror”. before the High Court which had been prepared mechanically by  
2 Clancy, as an Amicus Curiae. A copy of the 132 page Amicus Curiae Brief that Petitioner (Clancy)  
3 herein filed in the High Court appears at Appendix F-1 of “Exhibit 1 to this Complaint”  
4 5 Pleadings in the U.S. Supreme Court)

5 In Busch II, supra, the California Supreme Court held at page 334:

6 “ Thus, the Paris court has clearly held that states may constitutionally determine that  
7 public exhibition of obscene material has a tendency to injure the community or to jeopardize  
8 the maintenance of a decent society. In Luros we confirmed the validity of state regulation  
9 of the commercial distribution of obscene materials. The legislative definition of a public  
10 nuisance includes ‘[a]nything which is . . . indecent, or offensive to the senses, . . . so as  
11 to interfere with the comfortable enjoyment of life or property by a . . . community or  
neighborhood, or . . . any considerable number of persons . . . .’ (Pen. Code §370.)  
California’s public nuisance definition, including as it does indecency, comports fully with  
the state’s power to regulate as recently declared both by the federal Supreme Court and by  
ourselves and fortifies our conclusion that public nuisance laws may properly be employed  
to regulate the exhibition of obscene material to ‘consenting adults’ ” (Our emphasis.)

12 **66.** In filing the Projection Room Theatre Complaint in the Los Angeles County Superior  
13 Court, City Attorney Roger Arnebergh had attached to the Abatement Complaint, a “Time and  
14 Motion Study” for each film which was being abated, and incorporated such “Time and Motion  
15 Studies” and their “depiction” of indecent sexual conduct in the Complaint by reference. In Busch Z,  
16 the Court of Appeals specifically addressed the Time and Motion Study and held with respect to  
18 the Los Angeles City Attorney’s pleading of the allegations of the “Time and Motion Study” by  
reference at page 429:

19 “ Each of the complaints attached and incorporated by reference exhibits which  
20 included . . . so called time and motion studies of films.” . . . .

21 “<sup>3</sup> These exhibits, erroneously referred to in the complaints as “time and studies of  
22 motion pictures,” consist of verbal descriptions of the action depicted in the films keyed to  
strips of still prints in individual frames of the film corresponding thereto.”

23 and at page 430:

24 “ Defendants did not contend in the trial court, nor do they contend on this appeal, that  
25 the complaints did not adequately allege that the motion pictures . . . being exhibited  
26 and . . . described in the complaints were obscene. We may, therefore, spare the reader  
of this opinion any detailed description of them. Suffice it to say that if the allegations of the  
complaints as supplemented by the exhibits are true. the motion pictures . . . exhibited at  
defendants’ places of business constitute hard-core pornography and are obscene when  
judged by the standard set forth in section 311 of the Penal Code, as that section has been  
interpreted by the appellate courts of this state.” (Our emphasis.)

1 The Court of Appeals continued at page 431:

2 “ The same subject is exhaustively discussed by the United States Supreme Court in  
3 Paris Adult Theatre I v.  413 U.S. 93 S.Ct. 37 L.Ed.2d 446. In  
4 justifyin; the exclusio of an obscene motion picture from constitutional protection under  
5 the First Amendment. r the objection that it was ‘exhibited for consenting adults only’,  
6 the Court said:

7 We categorically disapprove the theory, apparently adopted by the trial judge,  
8 that obscene, pornographic films acquire constitutional immunity from state  
9 regulation simply because they are exhibited for consenting adults only. This holding  
10 was properly rejected by the Georgia Supreme Court. Although we have often  
11 pointedly recognized the high importance of the state interest in regulating the  
12 exposure of obscene materials to juveniles and unconsenting adults, see *Miller v.*  
13 *California*, *ante*, [413 U.S.] at 18-20 [93 S.Ct. 2607, at 2612-2613 (1973)]; *Stanley*  
14 *v. Georgia*, *supra* [394 U.S. 557] at 567 [ 89 S.Ct. 1243, 1249, 22 L.Ed.2d 542  
15 (1969)]; *Redrup v. New York*, 386U.S. 767,769, [87 S.Ct. 1414, 1415, 18 L.Ed.2d  
16 515] (1967), this Court has never declared these to be the only legitimate state  
17 interests permitting regulation of obscene material. The States have a long-  
18 recognized legitimate interest in regulating the use of obscene material in local  
19 commerce and in all places of public accommodation, as long as these regulations do  
20 not run afoul of specific constitutional problems. See *United States v. Thirty-seven*  
21 *Photographs*, *supra*, [402 U.S. 363,] at 376-377, [91 S.Ct. 1400, 1408-1409,  
22 28 L.Ed.2d 822] (opinion of White, J.); *United States v. Reidel*, 402 U.S. [351,] at  
23 354-356 [ 91 S.Ct. 1400, 1411-1413, 28 L.Ed.2d 813 (1971)]. Cf. *United States v.*  
24 *Thirty-seven Photographs*, *supra*, [402 U.S. 363,] at 378 [ 91 S.Ct. 1400, 1409,  
25 28 L.Ed.2d 822 (1971)] (Stewart, J., concurring). “In an unbroken series of cases  
26 extending over a long stretch of this Court’s history, it has been accepted as a  
27 postulate that ‘the primary requirements of decency may be enforced against obscene  
28 publications.’ [Near v. Minnesota, 283 U.S. 697, 716, [51 S.Ct. 625, 15 L.Ed.2d  
29 13571 (1931)].” *Kingsley Books, Inc. v. Brown*, *supra*, [354 U.S. (436,)] at 440  
30 [ 77 S.Ct. (1325), at 1327, 1 L.Ed.2d 1469].’” (Our emuhasis.)

18 The same procedural use is being made of the computerized Time and Motion Studies of the  
19 contents of the *A.T.&T.* Motion Picture videotapes, as allegations of indecent acts, which are an  
20 issue in this case.

21 **67.** Plaintiff is a resident of and owner of real property known as 9055 La Tuna Canyon  
22 Road, Sun Valley, California 91352, located at the southern boundary of Council District 1 in the  
23 City of Los Angeles, County of Los Angeles.

24 **68.** Prior to August 7, 2000, “Media One” owned the T.V. Cable Franchise “D” which  
25 supplied Plaintiffs property at 9055 La Tuna Canyon Road with T.V. Cable services See the map  
26 of Los Angeles Cable Franchise Areas “A” through “ N at to “Appendix F-10” of “**Exhibit 1** to this  
27 Complaint”, being the January 4, 2002 Pleading in the U.S. Supreme Court, The monthly billing for  
28 T.V. Cable services dated August 7, 2000, showed “Media One” to be the owner of the T.V. Cable





1 October 23, 2000, each of the five 15 minute preview segments “pandered the films as “real, live,  
 2 ill-American sex– not simulated by actors”. Plaintiff started surveilling *A.T.&T.*’s 7.5 hour daily  
 3 programs on January 27,2001, using 8 hour V.H.S. videotapes. The standard format used each day  
 4 by *A.T.&T.* for its (unlawful) hard-core pornographic business for the first 93 days (up to and  
 5 including May 1, 2001) was as follows:

6	Film #1 (hard-core)	10:00p.m.	-	11:15p.m.
	Previews #1 (hard-core “pandering”)	11:15p.m.	-	11:30p.m.
7	Film #2 (hard-core)	11:30p.m.	-	12:45a.m.
	Previews #2 (hard-core “pandering”)	12:45a.m.	-	01:00a.m.
8	Film #3 (hard-core)	01:00a.m.	-	02:15a.m.
	Previews #3 (hard-core “pandering”)	02:15a.m.	-	02:30a.m.
9	Film #4 (hard-core)	02:30a.m.	-	03:45a.m.
	Previews #4 (hard-core “pandering”)	03:45a.m.	-	04:00a.m.
10	Film #5 (hard-core)	04:00a.m.	-	05:15a.m.
	Previews #5 (hard-core “pandering”)	05:15a.m.	-	05:30a.m.

11  
 12       **73.** Of the 92 x 5= 460 films which were recorded, to and including May 1,2001, films  
 13 with 121 different titles were exhibited. The remaining 399 films (460-121) were repeats of the  
 14 121 titles. Plaintiff avers that all of the titles, which are named hereinafter at paragraph 75 as having  
 15 been exhibited to and including May 1, 2001, are ***malum in se*** “hard-core pornography”, i.e.; that  
 16 reasonable minds could not differ and that, as a matter of law, all reasonable persons would hold  
 17 such material to be “hard-core uornonrauhv”<sup>20/</sup>.

18  
 19                   **ANALOGUE CABLE TRANSMISSIONS ON CHANNEL 96 FROM**  
 20                   **JANUARY 28 TO MAY 2,2001.**

21       **74.** The original surveillancetapes of analogue cable transmissions on Channel 96, from  
 22 January 28, 2001 through May 1, 2001, establish that the following 460 videotape titles were  
 23 broadcast by *A.T.&T.* on the below listed 94 dates:

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24  
 25                   <sup>20/</sup>  
 26                   — The grossness ofthe 121 *A.T.&T.* hard-core pornography exceeds anything that the Mitchell Brothers  
 27 exhibited at the *Mitchell Brothers’ Santa Ana Theater* during the 11 years of Plaintiff’s litigation as the lead attorney  
 28 for the City of Santa Ana, California against the Mitchell Brothers in Court during the years 1976-1987. See Plaintiff’s  
 letter, dated November 24, 1999, to William T. Huston at **Appendix A** to the January 4, 2002 pleading in the  
 U.S. Supreme Court, a copy of which appears as **Exhibit 1** to **this** Complaint (5 Pleadings in the U.S. Supreme Court)  
 144 of the *Mitchell Brothers’* hard-core films were tried and held to be in violation of California Obscenity Statutes in  
 the *Mitchell Brothers’ Santa Ana Theater* litigation.

1	Tape 1 1/28/01	1. <i>Weekend in Bologna</i> 2. <i>Cries of Passion</i> 3. <i>Les Obstacles De Amour</i> 4. <i>Paradise Hole</i>
2		
3	Tape 2 1/29/01	1. <i>L.A. Unforgiven</i> 2. <i>No Man's Land #31</i> 3. <i>The Sexual Exorcist</i> 4. <i>Taking Out the Trash</i>
4		
5		
6	Tape 3 1/30/01	1. <i>More Inside Sex</i> 2. <i>Steal My Heart</i> 3. <i>Weekend in Bologna</i> 4. <i>Without Shame</i>
7		
8		
9	Tape 4 1/31/01	1. <i>Inside Sex</i> 2. <i>Hot Bods &amp; Tailpipes</i> 3. <i>Indigo Nights</i> 4. <i>No Man's Land #31</i> 5. <i>Girls' Night Out</i>
10		
11		
12	Tape 5 2/1/01	1. <i>Gusher Girls</i> 2. <i>L.A. Unforgiven</i> 3. <i>Weekend in Bologna</i> 4. <u><i>101 Cheerleaders &amp; 1 Jock</i></u>
13		
14	Tape 6 2/2/01	1. <i>Groove With Me</i> 2. <i>The Sexual Exorcist</i> 3. <i>Legs Wide Open</i> 4. <i>Cries of Passion</i>
15		
16		
17	Tape 7 2/3/01	1. <i>Gen Sex</i> 2. <u><i>101 Cheerleaders &amp; 1 Jock</i></u> 3. <i>Taking Out the Trash</i> 4. <i>More Inside Sex</i>
18		
19	Tape 8 2/4/01	1. <i>Playing Cupid</i> 2. <i>Without Shame</i> 3. <i>Xtreme Skating</i> 4. <i>Knee Deep In It</i>
20		
21		
22	Tape 9 (2/5/01)	1. <i>Taking Out the Trash</i> 2. <i>Room Servicing</i> 3. <i>The Sexual Exorcist</i> 4. <i>Lewd Conduct, Vol. III</i>
23		
24	Tape 10 (2/6/01)	1. <i>Without Shame</i> 2. <i>Unlocked</i> 3. <i>San Fernando Jones</i> 4. <i>[Transmission Problem]</i>
25		
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1	<b>Tape 11</b>	<b>2.</b>	<i>[TransmissionProblem]</i>
	<b>(2/7/01)</b>		<i>Summer Vacation</i>
2		<b>3.</b>	<i>Gen <b>Sex</b></i>
		<b>4.</b>	<i>Playing Cupid</i>
3		<b>5.</b>	<i>Weekend in Bologna</i>
4	<b>Tape 12</b>	<b>1.</b>	<i>Inside Porn</i>
	<b>(2/8/01)</b>	<b>2.</b>	<i>L.A. Unforgiven</i>
5		<b>3.</b>	<i>Indigo Nights</i>
		<b>4.</b>	<i>Rainwoman #14</i>
6	<b>Tape 13</b>	<b>1.</b>	<i>Close Shave Babes</i>
7	<b>(2/9/01)</b>	<b>2.</b>	<i>San Fernando Jones</i>
		<b>3.</b>	<i>Without Shame</i>
8		<b>4.</b>	<i>Bedroom Eyes</i>
9	<b>Tape 14</b>	<b>1.</b>	<i>Take My Wife</i>
	<b>(2/10/01)</b>	<b>2.</b>	<i>Taking Out the Trash</i>
10		<b>3.</b>	<i>Rainwomun #14</i>
		<b>4.</b>	<i>Xtreme Skating</i>
11		<b>5.</b>	<i>Heated Passions #2</i>
12	<b>Tape 15</b>	<b>1.</b>	<i>East Meets West 2</i>
	<b>(2/11/01)</b>	<b>2.</b>	<i>No Man's Land #31</i>
13		<b>3.</b>	<i>More Inside <b>Sex</b></i>
		<b>4.</b>	<i>Brentwood Housewife Hookers</i>
14		<b>5.</b>	<i>Inside Porn</i>
15	<b>Tape 16</b>	<b>1.</b>	<i>Ethnicity #6</i>
	<b>(2/12/01)</b>	<b>2.</b>	<i>Take My Wife</i>
16		<b>3.</b>	<i>Close Shave Babes</i>
		<b>4.</b>	<i>Taking Out the Trash</i>
17		<b>5.</b>	<i>M: Caught In the Act</i>
18	<b>Tape 17</b>	<b>1.</b>	<i>Girls' Night Out</i>
	<b>(2/13/01)</b>	<b>2.</b>	<i><u>Hell on Heels</u></i>
19		<b>3.</b>	<i>East Meets West 2</i>
		<b>4.</b>	<i>The Sexual Exorcist</i>
20		<b>5.</b>	<i>Shagging the Groove</i>
21	<b>Tape 18</b>	<b>2.</b>	<i>Groove With Me</i>
	<b>(2/14/01)</b>		<i>The Third <b>Kiss</b></i>
22		<b>3.</b>	<i>Love and Romance</i>
		<b>5.</b>	<i>Breaking Up</i>
23			<i>East Meets West 2</i>
24	<b>Tape 19</b>	<b>1.</b>	<i>My Baby Got Back #21</i>
	<b>(2/15/01)</b>	<b>2.</b>	<i>Playing Cupid</i>
25			<i>L.A. Unforgiven</i>
		<b>5.</b>	<i>No Man's Land #31</i>
26			<i>Without Shame</i>

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1	Tape 20 (2/16/01)	1.	<i>The Third Kiss</i>
2		2.	<i>L.A. Unforgiven</i>
3		3.	<i>No Man's Land #31</i>
		4.	<i>Girls' Night Out</i>
		5.	<i>Les Obstacles De Amour</i>
4	Tape 21 (2/17/01)	1.	<i>The Sopornos #2</i>
5			<i>Indigo Nights</i>
6		3.	<i>Groove with Me</i>
		5.	<i>Weekend in Bologna</i> <i>Take My Wife</i>
7	Tape 22 (2/18/01)	1.	<i>Figg's Fantasy</i>
8		3.	<i>M: Caught In the Act</i>
9			<i>Ethnicity #6</i>
		4.	<i>Summer Vacation</i>
		5.	[Transmission Problems]
10	Tape 23 (2/19/01)	1.	<i>Cries of Passion</i>
11		2.	<i>Figg's Fantasy</i>
12			<i>Take My wife</i>
		4.	<u><i>101 Cheerleaders &amp; 1 Jock</i></u>
		5.	<i>Gen Sex</i>
13	Tape 24 (2/20/01)	1.	<i>Portrait in Blue</i>
14		3.	<i>Queen of S.M. U.T.</i>
15			<i>Summer Vacation</i>
		4.	<i>Inside Porn</i>
		5.	<i>The Third Kiss</i>
16	Tape 25 (2/21/01)	1.	<i>Les Obstacles De L'Amour</i>
17		3.	<i>My Baby Got Back #21</i>
18			<i>Knee Deep In It</i>
		5.	<i>without Shame</i> <i>Figg's Fantasy</i>
19	Tape 26 (2/22/01)	1.	<i>Weekend in Deauville</i>
20			<i>Girls' Night Out</i>
21		3.	<u><i>101 Cheerleaders &amp; 1 Jock</i></u>
		5.	<i>Take My Wife</i> <i>Rainwoman #14</i>
22	Tape 27 (2/23/01)	1.	[Transmission Problems]
23		2.	[Transmission Problems]
24		3.	[Transmission Problems]
		4.	[Transmission Problems]
		5.	[Transmission Problems]
25	Tape 28 (2/24/01)	1.	<i>Staff</i>
26		3.	<i>The Third Kiss</i>
27			<i>Figg's Fantasy</i>
		4.	<i>L.A. Unforgiven</i>
28		5.	<i>The Sopornos #2</i>

1	Tape 29 (2/25/01)	1.	<i>Creating Nicole</i> <i>Gen <b>Sex</b></i>
2		3.	<i>My Baby Got Back #21</i>
3		4.	<i>Close Shave Babes</i>
		5.	<i>(Unknown Title)</i>
4	Tape 30 (2/26/01)	1.	<i>Weekend in Bologna (T/M G-5)</i> <i>More than a Handful #8</i>
5		3.	<i>Inside Porn</i>
6		4.	<i>East Meets West 2</i> <i>Computerized <b>Sex</b> Cravings</i>
7	Tape 31 (2/27/01)	1.	<i>L.A. Unforgiven</i> <i>African Heat</i>
8		3.	<i>The Sopornos #2</i>
9		4.	<i>Creating Nicole</i>
		5.	<i>(Unknown Title)</i>
10	Tape 32 (2/28/01)	1.	<i>M: Caught In the Act</i>
11		2.	<i>Computerized <b>Sex</b> Cravings</i>
12		3.	<i>Weekend in Deauville</i>
		4.	<i>My Baby Got Back #21</i> <i>Creating Nicole</i>
13	Tape 33 (3/1/01)	1.	<i>The Third Kiss</i> <i>The Sopornos #2</i>
14		3.	<i>Black Boots</i>
15		4.	<i>Weekend in Deauville</i>
		5.	<i>Figg's Fantasy</i>
16	Tape 34 (3/2/01)	1.	<i>Joyride</i>
17		2.	<i>Take My Wife</i>
18		3.	<i>Staff</i>
		4.	<i>My Baby Got Back #21</i> <i>Close Shave Babes</i>
19	Tape 35 (3/3/01)	1.	<i>Ace In the Hole</i>
20		3.	<i>Hell on Heels</i> <i>The Wicked Voyeur</i>
21		4.	<i>Planet <b>Sex</b> XXX</i>
		5.	<i>Computerized <b>Sex</b> Cravings</i>
22	Tape 36 (3/4/01)	1.	<i>Hell, Hookers &amp; Heels</i>
23		2.	<i>Creating Nicole</i>
24		3.	<i>Summer Vacation</i> <i>New Wave Hookers 6</i>
		5.	<i>Summer Vacation</i>
25	Tape 37 (3/5/01)	1.	<i>Take My Wife</i>
26		2.	<i><b>Sex</b> Safari</i>
27		3.	<i>Hell on Heels</i> <i>Black Boots</i>
28		5.	<i>Playing Cupid</i>

1	Tape 38 (3/6/01)	1.	[Transmission Problems] <i>Call of the City</i>
2		3.	<i>Hell, Hookers &amp; Heels</i>
3		4.	<i>Things Change #4</i> <i>The Third Kiss</i>
4	Tape 39 (3/7/01)	1.	<i>Inside Porn</i>
5		3.	<i>Close Shave Babes</i> <i>Call of the City</i>
6		4.	<i>Shagging the Groove</i>
7		5.	<i>Staff</i>
8	Tape 40 (3/8/01)	1.	<i>Where the Boys Aren't #10</i> <i>Inside Porn</i>
9		3.	<i>Computerized Sex Cravings</i>
10		4.	<i>Planet Sex XXX</i>
11		5.	<i>Perfect Pink</i>
12	Tape 41 (3/9/01)	1.	[Transmission Problems]
13		2.	[Transmission Problems]
14		3.	[Transmission Problems]
15		4.	[Transmission Problems]
16		5.	[Transmission Problems]
17	Tape 42 (3/10/01)	1.	<i>Girls' Night Out</i>
18		3.	<i>Where the Boys Aren't #10</i> <i>Call of the City</i>
19		4.	<i>Joyride</i>
20		5.	[Transmission Problems]
21			
22	Tape 43 (3/11/01)	1.	<i>In the Mind of Madness</i>
23		2.	<i>The Sopornos #2</i>
24		3.	<i>My Baby Got Back #21</i> <i>The Third Kiss</i>
25		5.	<i>Hell, Hookers &amp; Heels</i>
26			
27	Tape 44 (3/12/01)	1.	<i>New Wave Hookers 6</i>
28		3.	<i>Shadow Dancing, Vol. 2</i> <i>The Madam's New Maid</i>
29		4.	<i>Staff</i>
30		5.	<i>Gen Sex</i>
31			
32	Tape 45 (3/13/01)	1.	<i>My Baby Got Back #21</i>
33		2.	[Transmission Problems]
34		3.	<i>The Third Kiss</i>
35		4.	<i>In the Mind of Madness</i>
36		5.	<i>Perfect Pink</i>
37	Tape 46 (3/14/01)	1.	<i>Weekend in Deauville</i>
38		3.	<i>Ace In the Hole</i> <i>Girls' Night Out</i>
39		4.	<i>Joyride</i>
40		5.	<i>Portrait in Blue</i>
41			

1	<b>Tape 41</b> (3/15/01)	1.	<i>Sorority <b>Sex</b> Kittens #4</i>
2		2.	<i>Hell, Hookers &amp; Heels</i>
3		3.	<i>Close Shave Babes</i>
4		4.	<i>East Meets West 2</i>
5		5.	<i>Playthings</i>
6	<b>Tape 48</b> (3/16/01)	1.	<i>Amanda's Diary</i>
7		2.	<b>Sex</b> Safari
8		3.	<i>(Unknown Title)</i>
9		4.	<i>Things Change #4</i>
10		5.	<i>The Wicked Voyeur</i>
11	<b>Tape 49</b> (3/17/01)	1.	<i>Getting Lucky</i>
12		2.	<i>Eternal Desire</i>
13		3.	<i>Babearella</i>
14		4.	<i>New Wave Hookers 6</i>
15		5.	<i>The Madam's New Maid</i>
16	<b>Tape 50</b> (3/18/01)	1.	<i>How to Marry a Doctor</i>
17		2.	<i>Joyride</i>
18		3.	<i>In the Mind of Madness</i>
19		4.	<i>Portrait in Blue</i>
20		5.	<i>Gettin Lucky</i>
21	<b>Tape 51</b> (3/19/01)	1.	<i>Creating Nicole</i>
22		2.	<i>Shagging the Groove</i>
23		3.	<i>Figg's Fantasy</i>
24		4.	<i>Playthings</i>
25		5.	<i>Where the Boys Aren't #10</i>
26	<b>Tape 52</b> (3/20/01)	1.	[Transmission Problems]
27		2.	[Transmission Problems]
28		3.	[Transmission Problems]
29		4.	[Transmission Problems]
30		5.	[Transmission Problems]
31	<b>Tape 53</b> (3/21/01)	1.	<i>How to Marry a Doctor</i>
32		2.	<i>Portrait in Blue</i>
33		3.	<i>Ace In the Hole</i>
34		4.	<b>Sex</b> Across America #3, S.F.
35		5.	<i>In the Mind of Madness</i>
36	<b>Tape 54</b> (3/22/01)	1.	<i>Bounty Woman X</i>
37		2.	<i>Gettin Lucky</i>
38		3.	<i>Hell, Hookers &amp; Heels</i>
39		4.	<i>Playing Cupid</i>
40		5.	<i>Groove With Me</i>
41	<b>Tape 55</b> (3/23/01)	1.	<i>A Day at the Spa</i>
42		2.	<i>Hell, Hookers &amp; Heels</i>
43		3.	<i>Weekend in Deauville</i>
44		4.	<i>Babearella</i>
45		5.	<b>Sex</b> Across America #3, S.F.

1	Tape 56 (3/24/01)	1. <i>Weekend in Bologna</i> 3. <i>Gen <b>Sex</b></i> 4. <i>Creating Nicole</i> 5. <i>Take My Wife</i> <i>Amanda's Diary</i>
2		
3		
4	Tape 57 (3/25/01)	1. <i>Fetish Island</i> 3. <i>Private Fantasies #3</i> 4. <i>Sorority <b>Sex</b> Kittens #4</i> 5. <i>Ace In the Hole</i> <i>Private Fantasies #3</i>
5		
6		
7	Tape 58 (3/26/01)	1. <i>East Meets West 2</i> 3. <i>Things Change #4</i> 4. <i>Where the Boys Aren't #10</i> 5. <i>Amanda's Diary</i> <i>A Day at the Spa</i>
8		
9		
10	Tape 59 (3/27/01)	1. <i>Portrait in Blue</i> 2. <i>Fetish Island</i> 3. <i>Joyride</i> 4. <i>Amanda's Diary</i> 5. <i>Bounty Woman X</i>
11		
12		
13	Tape 60 (3/28/01)	1. <i>Computerized <b>Sex</b> Cravings</i> 2. <i>In the Mind of Madness</i> 3. <i>Getting Lucky</i> 4. <i>The Madam's New Maid</i> 5. <i>How to Marry a Doctor</i>
14		
15		
16	Tape 61 (3/29/01)	1. <i>Dirty Deals</i> 2. <i>Private Fantasies #3</i> 3. <i><b>Sex</b> Across America #3, S.F.</i> 4. <i>Eternal Desire</i> 5. <i>Ace In the Hole</i>
17		
18		
19	Tape 62 (3/30/01)	1. <i>Lacy Is Di New Brat</i> 2. <i>Sorority <b>Sex</b> Kittens #4</i> 3. <i>The Madam's New Maid</i> 4. <i>Creating Nicole</i> 5. <i>Fetish Island</i>
20		
21		
22	Tape 63 (3/31/01)	1. <i>Never Quite Enough</i> 2. <i>Fantasies in Black Leather</i> 3. <i>A Day at the Spa</i> 4. <i>Summer Vacation</i> 5. <i>Sorority <b>Sex</b> Kittens #4</i>
23		
24		
25	Tape 64 (4/1/01)	1. <i><u>101 Cheerleaders &amp; 1 Jock</u></i> 2. <i>Where the Boys Aren't #10</i> 3. <i>Women in Control</i> 4. <i>Hell, Hookers &amp; Heels</i> 5. <i>Bounty Woman X</i>
26		
27		
28		

1	<b>Tape 65</b>	1.	<i>Lacy Is Di New Brat</i>
	<b>(4/2/01)</b>	2.	<i>The Quick and the Hard</i>
2		3.	<i>Club Sin</i>
		4.	<i>Devil or Angel</i>
3		5.	<del>Sex</del> <i>Across America #3, S.F.</i>
4	<b>Tape 66</b>	1.	[Transmission Problems]
	<b>(4/3/01)</b>	2.	[Transmission Problems]
5			<i>Nicci's Naked Hookers</i>
6		4.	[Transmission Problems]
		5.	<i>Dirty Deals</i>
7	<b>Tape 67</b>	2.	<i>Planet <del>Sex</del> XXX</i>
	<b>(4/4/01)</b>		<i>Shrink Wrapped</i>
8		3.	<i>Pushover</i>
9		5.	<i>No Man's Land: Interracial Edition #4</i>
			<i>Lacy Is Di New Brat</i>
10	<b>Tape 68</b>	1.	<i>For Money or Love</i>
	<b>(4/5/01)</b>	2.	<del>Sex</del> <i>Across America #3, S.F.</i>
11		3.	<i>Jiggly Queens 4</i>
12		4.	<i>Dirty Deals</i>
		5.	<i>Getting Lucky</i>
13	<b>Tape 69</b>	2.	[Recording Malhncion]
	<b>(4/6/01)</b>		[Recording Malhncion]
14		3.	<i>More than a Handful #8</i>
15		5.	<i>American Booty</i>
			<i>Ace In the Hole</i>
16	<b>Tape 70</b>	2.	<i>Porn Star Comedian: Censor This</i>
	<b>(4/7/01)</b>		<i>Never Quite Enough</i>
17		3.	<i>Sorority <del>Sex</del> Kittens #4</i>
18		4.	<i>The Madam's New Maid</i>
		5.	<i>Girls' Night Out</i>
19	<b>Tape 71</b>	2.	<i>A Virgin Tale</i>
	<b>(4/8/01)</b>		<i>Private Fantasies #3</i>
20		3.	<i>For the Right Price</i>
21		5.	<i>Joyride</i>
			<i>In the Mind of Madness</i>
22	<b>Tape 72</b>	1.	<del>Sex</del> <i>Across America #3, S.F.</i>
	<b>(4/9/01)</b>	2.	<i>Devil or Angel</i>
23		3.	<i>Fetish Island</i>
24			<i>Hell, Hookers &amp; Heels</i>
		5.	<i>A Virgin Tale</i>
25	<b>Tape 73</b>	2.	<i>Ace In the Hole</i>
	<b>(4/10/01)</b>		<i>Topless Room Service</i>
26		3.	<i>A Day at the Spa</i>
27		5.	<i>Private Fantasies #3</i>
			<i>Where the Boys Aren't #10</i>
28			

1	<b>Tape 74</b> (4/11/01)	1.	<i>In the Mind of Madness</i>	
2		2.	<i>Joyride</i>	
3		4.	<i>Porn Star Comedian: Censor This</i>	
			4.	<i>Lacy Is Di New Brat</i>
			5.	<i>Fetish Island</i>
4	<b>Tape 75</b> (4/12/01)	1.	<i>My Invisible Friend</i>	
5		2.	<i>The Madam's New Maid</i>	
6			<i>Private Fantasies #3</i>	
		4.	<i>Becoming Wet</i>	
		5.	<i>A Day at the Spa</i>	
7	<b>Tape 76</b> (4/13/01)	1.	<b>Sex Across America #4, N. Y.</b>	
8		2.	<i>Girls' Night Out</i>	
9		3.	<i>Ace In the Hole</i>	
		4.	<i>Never Quite Enough</i>	
		5.	<i>Private Fantasies #3</i>	
10	<b>Tape 77</b> (4/14/01)	1.	<i>Devil in Disguise</i>	
11		2.	<i>A Virgin Tale</i>	
12		3.	<i>Women in Control</i>	
			<u><i>101 Cheerleaders &amp; 1 Jock</i></u>	
		5.	<i>Never Quite Enough</i>	
13	<b>Tape 78</b> (4/15/01)	1.	[Transmission Problems]	
14		2.	[Transmission Problems]	
15			[Transmission Problems]	
		4.	[Transmission Problems]	
		5.	[Transmission Problems]	
16	<b>Tape 79</b> (4/16/01)	1.	<i>Girls' Night Out</i>	
17		2.	<i>She's Got Cold Feet</i>	
18			<b>Sex Across America #4, N. Y.</b>	
		4.	<i>Porn Star Comedian: Censor This</i>	
		5.	<u><i>101 Cheerleaders &amp; 1 Jock</i></u>	
19	<b>Tape 80</b> (4/17/01)	1.	<i>Dirty Deals</i>	
20		2.	<i>More than a Handful #8</i>	
21		3.	<i>Where the Boys Aren't #10</i>	
		4.	<i>Pinups</i>	
		5.	<i>The Madam's New Maid</i>	
22	<b>Tape 81</b> (4/18/01)	2.	<i>Bounty WomanX</i>	
23			<i>A Virgin Tale</i>	
24		3.	<i>My Invisible Friend</i>	
		4.	<i>Taxi Dancer</i>	
		5.	<i>Devil in Disguise</i>	
25	<b>Tape 82</b> (4/19/01)	2.	<i>Nobody But You</i>	
26			<i>Lacy Is Di New Brat</i>	
27		3.	<i>Planet Sex XXX</i>	
			<i>The X Girls</i>	
28		5.	<i>Women in Control</i>	

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1	<b>Tape 83</b> <b>(4/20/01)</b>	1. <i>Lethal Information</i> 2. <i>Amanda's Diary</i> 3. <i>Bounty WomanX</i> 4. <i>Fetish Island</i> 5. <i>How to Marry a Doctor</i>
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4	<b>Tape 84</b> <b>(4/21/01)</b>	1. <i>Sorority Shower Cam</i> 2. <i>Gettin Lucky</i> 3. <i>Where the Boys Aren't #10</i> 4. <b>Sex</b> <i>Across America #4, N. Y.</i> 5. <i>Porn Star Comedian: Censor This</i>
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7	<b>Tape 85</b> <b>(4/22/01)</b>	1. <i>Natural Instincts</i> 2. <i>Lethal Information</i> 3. <i>Dirty Deals</i> 4. <i>A Day at the Spa</i> 5. <i>Devil in Disguise</i>
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10	<b>Tape 86</b> <b>(4/23/01)</b>	1. <i>Hell, Hookers &amp; Heels</i> 2. <i>Ego</i> 3. <u><i>101 Cheerleaders &amp; 1 Jock</i></u> 4. <i>Love 'Em or Leave 'Em</i> 5. <i>Taxi Dancer</i>
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13	<b>Tape 87</b> <b>(4/24/01)</b>	1. <i>Fetish Island</i> 2. <i>Lethal Information</i> 3. <i>Topless Marathon Runners</i> 4. <b>Sex</b> <i>Across America #3, S.F.</i> 5. <i>The Secretary</i>
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16	<b>Tape 88</b> <b>(4/25/01)</b>	1. <i>How to Many a Doctor</i> 2. <i>Pushover</i> 3. <i>A Day ut the Spa</i> 4. <i>For the Right Price</i> 5. <i>Natural Instincts</i>
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19	<b>Tape 89</b> <b>(4/26/01)</b>	1. [Transmission Problems] 2. <i>Porn Star Comedian: Censor This</i> 3. [Transmission Problems] 4. [Transmission Problems] 5. [Transmission Problems]
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21		
22	<b>Tape 90</b> <b>(4/27/01)</b>	1. <i>Amanda's Diary #3</i> 2. <i>Dirty Deals</i> 3. <i>A Virgin Tale</i> 4. <i>Natural Instincts</i> 5. <i>Lethal Information</i>
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25	<b>Tape 91</b> <b>(4/28/01)</b>	1. <i>Talk Dirty To Me #12</i> 2. <i>In the Mind of Madness</i> 3. <i>The X Girls</i> 4. <i>My Invisible Friend</i> 5. <i>Amanda's Diary #3</i>
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- |    |                              |    |                                      |
|----|------------------------------|----|--------------------------------------|
| 1  | <b>Tape 92<br/>(4/29/01)</b> | 1. | <i>The Pink Package</i>              |
| 2  |                              | 2. | <i>Taxi Dancer</i>                   |
| 3  |                              | 3. | <i>Talk Dirty To Me #12</i>          |
| 4  |                              | 4. | <i>Sorority Shower Cam</i>           |
| 5  |                              | 5. | <i>Amanda's Diary</i>                |
| 6  | <b>Tape 93<br/>(4/30/01)</b> | 1. | [Transmission Problems]              |
| 7  |                              | 2. | <i>Shrink Wrapped</i>                |
| 8  |                              | 3. | <i>How to Marry a Doctor</i>         |
| 9  |                              | 4. | <i>Amanda's Diary 3</i>              |
| 10 |                              | 5. | <i>Amanda's Diary</i>                |
| 11 | <b>Tape 94<br/>(5/1/01)</b>  | 1. | <i>Natural Instincts</i>             |
| 12 |                              | 2. | <i>House Party 4, "Office Party"</i> |
| 13 |                              | 3. | <i>Nobody But You</i>                |
| 14 |                              | 4. | [Transmission Problems]              |
| 15 |                              | 5. | [Transmission Problems]              |

16           **75.**     The surveillances described herein above establish that, beginning on or about  
17     January 27, 2001, and repeatedly and continuously thereafter, up to and including May 1, 2001, the  
18     defendants *A. T. & T.*, *The Hot Network* and *The Hot Zone* daily, and publicly exhibited or caused  
19     to be exhibited as a regular course of business and possessed for the purpose of such exhibition, the  
20     following 121 hard-core pornographic motion picture separate titles which were exhibited. The list  
21     of the 121 different titles are:

**ANALOGUE CABLE CHANNEL 96**

22           **NOTE: THIS LIST OF TAPES REFERS TO TIME/DATE GENERATED COPIES:**

- |    |                   |    |  |
|----|-------------------|----|--|
| 23 | <b>T/M Tape A</b> | 1. | <i>Hell on Heels</i>                       |
| 24 |                   | 2. | <i>Breaking Up</i>                         |
| 25 |                   | 3. | <i>Brentwood Housewife Hookers</i>         |
| 26 |                   | 4. | <i>Close Shaved Babes</i>                  |
| 27 |                   | 5. | <i>Cries &amp; Passion</i>                 |
| 28 |                   | 6. | <i>Ethnicity #6</i>                        |
| 29 | <b>T/M Tape B</b> | 1. | <i>Figg's Fantasy</i>                      |
| 30 |                   | 2. | <i>Gen <del>Sex</del></i>                  |
| 31 |                   | 3. | <i>Girls' Night Out</i>                    |
| 32 |                   | 4. | <i>Groove with Me</i>                      |
| 33 |                   | 5. | <i>Gusher Girls</i>                        |
| 34 |                   | 6. | <i>Heated Passions</i>                     |
| 35 |                   | 7. | <i>East Meets West (partial recording)</i> |

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**T/M Tape C**

1. *Hot Bods and Tailpipes*
2. *Indigo Nights*
3. *Inside Sex*
4. *Inside Porn*
5. *Knee Deep In It*
6. *L.A. Unforgiven*

**T/M Tape D**

1. *Les Obstacles*
2. *Legs wide Open*
3. *Lewd Conduct*
4. *Love and Romance*
5. *M: Caught In the Act*
6. *More Inside Sex*

**T/M Tape E**

1. *My Baby Got Back #21*
2. *No Man's Land #31*
3. *101 Cheerleaders & I Jock*
4. *Paradise Hole*
5. *Playing Cupid*
6. *Rainwoman #14*

**T/M Tape F**

1. *Room Service*
2. *San Fernando Jones*
3. *Steal My Heart*
4. *Summer Vacation*
5. *Take My wife*
6. *Taking Out the Trash*

**T/M Tape G**

1. *The Sexual Exorcist*
2. *The Sopornos*
3. *The Third Kiss*
4. *Unlocked*
5. *Weekend in Bologna*
6. *without Shame*

**T/M Tape H**

1. *Ace In the Hole*
2. *African Heat*
3. *Black Boots*
4. *Computerized Sex Cravings*
5. *Creating Nicole*
6. *Hell, Hookers & Heels*

**T/M Tape I**

1. *Joyride*
2. *New Wave Hookers*
3. *Planet Sex XXX*
4. *Queen of S.M. U.T.*
5. **Sex** *Safari*
6. *Portrait in Blue*

**T/M Tape J**

1. *Call of the City*
2. *Shagging the Groove*
3. *Staff*
4. *Extreme Skating*
5. *with Bedroom Eyes*
6. *Weekend in Deauville*