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13	SUPERIOR COURT OF THE STATE OF CALIFORNIA		
14	FOR THE COUNTY OF LOS ANGELES		
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16	GORDON & HOLMES, Civil Trial	Case No. BC 462438	
17	Lawyers - a partnership of professional corporations; RHONDA J. HOLMES, a	Assigned for All Purposes to the	
18	professional corporation; and RHONDA J. HOLMES, as an individual,	Honorable Michael Johnson, Department 56	
19	Plaintiffs,	PLAINTIFFS' OPPOSITION TO DEFENDANT'S MOTION IN LIMINE NO.	
20	ν.	5	
21	COURTNEY MICHELLE LOVE (aka	TRIAL DATE: January 13, 2014 TIME: 8:30 a.m.	
22	Courtney Michelle Harrison, aka Courtney Michelle Meneely), an individual; and,	DEPT.: 56	
23	DOES 1-10, inclusive,		
24	Defendants.	Action Filed: May 26, 2011	
25		Trial Date: January 13, 2014	
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27			
28			
	II	1	

MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

Defendant Courtney Love seeks to exclude the statements she made on a nationally broadcast radio show with Howard Stern—after this litigation was commenced—where she specifically discussed circumstances related to disputed issues in this case. In the interview, Love made relevant admissions regarding (for example): her use of and attitude towards Twitter, the facts surrounding her publication of the defamatory statements, her attitude towards attorneys generally, and her feelings about her troubled relationship with her daughter—which Love has put at issue. As relevant party admissions, her statements are admissible and are not subject to any exclusionary rule.

To be clear, Plaintiffs do not seek to introduce irrelevant statements by Love or any of Stern's questions that do not simply contextualize Love's responses. In other words, Plaintiffs only seek to explore the material related to this action that Love voluntarily and purposely made to a wide audience on a popular radio show. This is a far cry from "character assassination." Plaintiffs respectfully request that Love's motion be denied.

II. ANALYSIS

A. Love Made Statements In The Stern Interview That Are Directly Relevant To The Facts At Issue In This Case.

Many of Love's statements in the Stern interview tend to prove or disprove disputed facts of consequence in this case, and are therefore relevant under Evidence Code § 210. Tellingly, in her motion, Love merely cuts and pastes portions of the interview and summarily concludes that the *entire interview* does not tend to prove facts of consequence to the case, ignoring the substance of any of Love's particular statements.

To the contrary, even a cursory examination of the issues Love discusses in the interview demonstrates that multiple portions of the interview are relevant. Most significantly, Love directly discusses this case and issues relevant to her intent and actions, such as her belief that the statements were true and her contention that she made the statements in response to someone's question.

Love also discusses facts relevant to her familiarity with Twitter—which the Court has determined is relevant—stating that while she initially "didn't know what [Twitter] was for," she now is "very responsible about" her Tweets and manages her Twitter account herself. Moreover, she discusses facts related to her attitude towards Twitter, admitting that she uses it to generate income.

Additionally, Love makes admissions about her attitude towards attorneys generally (relevant to intent), her feelings about her relationship with her daughter (relevant to the letter from Plaintiffs to Love's daughter that Love intends to introduce and Plaintiffs claim that Love instructed them to send it), and her net worth (which will be relevant to the damages portion of this case).

These examples demonstrate that the interview contains relevant information admissible under Evidence Code § 350. And, Love's statements are not subject to exclusion under Evidence Code § 350 because they are Love's own statements about the subject matter of this case—as such, they will not cause undue prejudice. "The prejudice which exclusion of evidence under Evidence Code section 352 is designed to avoid is not the prejudice or damage to a defense that naturally flows from relevant, highly probative evidence." *People v. Zapien*, 4 Cal. 4th 929, 958, 846 P.2d 704, 718 (1993)

B. To The Extent Plaintiffs Seek To Introduce Any Statements By Stern, They Will Be Limited To Questions That Contextualize Love's Admissions—And Not Offered To Prove The Truth Of The Matter Asserted.

Apparently conceding the point, Love's motion does not challenge that Love's statements in the Stern interview are not subject to exclusion under the hearsay rule as party admissions under Evidence Code § 1220. Rather, Love asserts that Stern's statements are hearsay—an assertion based on the misguided impression that Plaintiffs will attempt to introduce Stern's statements to prove the truth of the matter asserted in them.

Not so. Plaintiffs will not seek to introduce Stern's colorful statements about Love such as his statements that Love is "unfiltered" or likes to "speak out."

However, a blanket prohibition on the admissibility of Stern's statements would preclude Plaintiffs from seeking to admit the foundational questions Stern asked to produce Love's admissions, which would not be offered to provide their truth, but rather merely to provide context. For example, Stern's co-host's asked Love "[w]hy is it important for you to be on Twitter?," to which Love responded "[o]h, you know why? Because I make a lot of money sometimes." Questions such as this—not offered to prove the truth of the matter asserted—are foundational to Love's admissible response. Because there is nothing prejudicial about these non-hearsay statements/questions, they also should not be excluded under Evidence Code § 352.

III. CONCLUSION

Based on the foregoing, Plaintiffs respectfully request that the Court deny Love's Motion in Limine No. 5 in its entirety.

Dated: January 14, 2014

BROWNSTEIN HYATT FARBER SCHRECK, LLP

By:

BARRY LANGBERG MITCHELL J. LANGBERG MARGO J. ARNOLD Attorneys for Plaintiffs

GORDON & HOLMES, RHONDA J. HOLMES, APC and RHONDA J. HOLMES

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4	THE HOWARD STERN SHOW:
5	2013 INTERVIEW WITH COURTNEY LOVE
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1		
1	INDEX	
2		Page
3		rage
4	OPENING BY MR. STERN:	4
5	INTERVIEW - COURTNEY LOVE:	4
6		
7		
8		
9		
10		
11		
12		
1.3		
14		
15		
16		
17		
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20		
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1
          Q. BY MR. STERN: (Unintelligible).
                                               She's the
2
   person in charge of the Nirvana thing. Let me see
   you.
3
4
              MS. QUIVERS: Plus she's a member of
   (unintelligible).
5
          Q. BY MR. STERN: Hey, baby. What do you say?
6
7
   You're looking good. Thin and trim. Looking hot.
          A. How you doing, baby?
8
              Boy, it's been a long time.
9
          Q.
10
          Α.
              No, it's been three years.
11
             Is that right?
          Q.
12
              MS. QUIVERS: That's a long time.
              MS. LOVE: Yeah, for you and me and Robin
13
14
   it's --
              MS. QUIVERS: Yeah.
15
16
              MS. LOVE: -- a long time. What am I now,
17
   on, like --
18
          Q. BY MR. STERN: You look good.
19
          A. -- fourteenth, this is my four, not including
20
   the crazy call-ins.
21
          Q. Yeah, right. It, it's been a, but why have
22
   you taken a three year hiatus from us? Be honest. Why,
23
   why --
24
          A. I, because that record flopped.
          Q. Yeah, but so what? I mean, you, you love --
25
```

- Q. Yeah, you always love to voice your opinion. In fact, I, I, I can't decide if the invention of Twitter has been good for you or bad for you.
- A. Bad, in the sense that, well, I learned my lesson. I do my Twitter now and I'm very, like, super happy cake friendly nice, but initially I didn't know what it was for, so I just called everyone a whore, and then I got two, I got two defamation suits.
- 11 Q. When you call --

4

6

7

- 12 A. They cost me, like, half a, more than, it
 13 was, like, seven hundred and eighty thousand dollars.
- MS, QUIVERS: Oh (unintelligible).
- Q. BY MR. STERN: You're not kidding around.
- 16 One of those suits was against a fashion designer.
- 17 You kind of, you know, you kind of like to spew. It's 18 almost like (unintelligible).
- A. I, I didn't, it was my first day. I didn't know what it was.
- Q. Right.
- A. I was just, like, "You fucking," excuse my lang, can I can say that?
- Q. Yeah. Yeah, you're good.
- A. Yeah. Oh, right. We're not on 92.3

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G1/16/14
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```
1
   anymore.
2
          Q.
              That's right.
              Right. Then, "You fucking whore!"
3
          Α.
4
          Q.
              Yeah, you can those words. Right.
5
          Α.
              So I didn't know what it was, and --
              You were critical of the fashion designer's
6
          Ο.
7
   clothing?
              Is that what it was?
8
              She, I felt like she had stolen from me. I
          Α.
   have to say "I felt like" and "allegedly" --
10
          Q.
              Right. Right.
              -- which is just as bad as the, the F, FFC,
11
   or what it is? FEC? FEA?
12
13
              MS. QUIVERS: F what?
          Q. BY MR. STERN: FCC?
14
15
          Α.
              FCC. Yeah. Up your ass. It's, like,
16
   allegedly. Allegedly?
17
          Q.
              Right.
              She allegedly stole from me?
18
          Α.
19
          Q.
              Right.
20
              I have it on CCTV. Okay. She allegedly
          Α.
   stole from me --
21
22
          Q.
              Right.
23
          Α.
             -- but --
24
              So she sued you and it cost you a half a
          Q.
   million dollars --
25
```

So when a lawyer sues you you're kind of

24

25

screwed.

```
Q. Had you, were, were you talking about him
1
   directly and --
3
          Α.
              Her.
              Her, and you were saying bad, disparaging
   things about her? Was that the case?
5
 6
          A. No, I actually believed what I said, which
7
   I, I felt like she had been sort of gotten to or she'd
   abandoned me and been possibly compromised and
 8
   everything --
10
          Q. I see.
11
             -- because she was coming to save me. You
   know, I've never called --
12
13
          Q. And so you get on Twitter, what happens?
   You're there late at night and you're looking at
14
15
   this --
          A. I was actually answering somebody's question
16
17
   if I thought that she'd been corrupted and I said
18
   yes --
19
          Q. I see.
20
          Α.
             -- I did think that.
              So that cost you a lot of money. You know,
21
          Q.
   the thing with you is you are honest, you're
   unfiltered, and an invention like Twitter is
23
24
   dangerous --
25
         A. I should have your job.
```

A. No, they told me that. Maybe they were

```
BT/16/19
```

```
lying, but, you know, hey --
1
2
          Q.
              That's my point. You don't, you can't
3
   just blurt things out, and Twitter --
          Α.
              Well, I've learned my lesson.
4
5
          Ο.
              Well --
              It's a million dollar lesson, Howard.
 6
          Α.
7
              Why not close down your Twitter account?
          Q.
 8
          Α.
              My, because now it's all happy cake pie pie.
              Well, how did that happen now? Do you have
9
          Q.
10
   someone that reads your tweets before you put them out?
              No, I do it myself. I'm actually very
11
12
   responsible about it.
              But isn't that a problem because sometimes
13
          0..
14
   you think you're being responsible but --
15
              I haven't gotten in trouble, Twitter trouble
          Α.
   in over three years, two-and-a-half, three years.
16
          Q. All right.
17
18
              MS. QUIVERS: Why is it so important to you
19
   to be on Twitter?
20
          Q. BY MR. STERN: Yeah.
21
              Oh, you know why? Because I make a lot of
22
   money sometimes. Like if, if --
23
              Oh, really?
          Ο.
24
              Yeah. Like, I was smoking these e-
   cigarettes, which I didn't bring, which sucks --
25
```

Well, no, that's --

1

Ο.

```
It means you're really implying you did make
1
          Ο.
   love to him.
              No, I did, I did not date him! I didn't!
3
              Oh, you didn't?
4
          Q.
              I didn't!
5
              You once, but, why are you saying, why, why
6
7
   are you acting like you didn't?
              Because I didn't!
8
          Α.
              Are you still dating him?
9
          Ο.
10
          Α.
              No!
11
             Are you here to say you're seeing him behind
          Q.
12
   Chelsea's back or something?
13
              No!
          Α.
14
              No. So what are you saying when you make
15
   that face to me? You, I, I --
16
              I was making a cross-eyed face to you,
17
   Howard.
              Okay, but what does that --
18
          Q.
              Don't be a verkakte! For God's sake!
19
          Α.
20
              But what, but what does that mean?
          Q.
21
              Nothing! I was making a face at you!
          Α.
22
              So you never dated the guy?
          Q.
23
          Α.
              Never.
24
              And now you're going to make that face.
          Q.
   You, I, I never know what, what's going on with you.
25
```

I can't even figure out what's going on with this

```
01/16/19
```

```
twenty-five percent --
1
2
          Q.
              Right.
3
              -- and, and I had a really, really lousy
4
   lawyer. I don't have to say his name --
5
          Q.
              Right.
6
          Α.
              -- so I don't have to say alleged.
7
          Q.
              Okay.
8
              He was a fuck, okay?
          Α.
              Why?
9
          ο.
10
          Α.
              Because lawyers tend to be fucks.
   Especially in L.A.
11
12
          Q. You mean you're, you're accusing him of not
13
   being good about getting the right price for your
14
   twenty-five percent?
15
          A. He did not have my right, no, he got a
   good price and then he sort of took the money and ran,
16
17
   if you know what I mean.
18
          Q. But how does that happen to you all the
19
   time?
20
          Α.
               It happens to everybody all the time.
               What, what, well, well, I, look --
21
           Ο.
               It's just the music business.
22
           Α.
23
           Q.
              -- I have a, some (unintelligible) --
24
               I have a great agent now. His name is Jeff
           Α.
25
             He's seventy years old. He, like, invented
   Franklin.
```

```
BILLEVIE
```

```
rock, right?
1
2
          Q. Right. He's seventy?
              He's the --
3
          Α.
          Q.
              Right.
4
5
              -- he, he might be, he, I'd like to say he's
   fifty-five --
6
7
          Q.
              Right.
              -- but, you know, he's, he's older --
8
              Right.
9
          Q.
10
          A. -- and he's, and he's hot. He's, he's
   kind of sexy --
11
12
          Q. Right.
13
          A. -- and I met him, you know, I told him the
14
   worst thing I ever did was I had to go to Bellevue, you
15
   know, in a stretcher for crack or whatever. He goes,
   "Did you have fun?" Which made me love him immediately,
16
   right?
17
18
          Q.
             Right.
             And he said, "Listen, so-and-so, Lady, you
19
20
   know, Pooh-Pooh, whatever, La-La, La-La, whatever,
21
   some artist, has four hundred million."
22
          Q. Right.
23
              "She has a hundred million. The guys take
   three hundred million. That's just the business.
24
   Deal with it."
25
```

Madonna, too? I mean, Madonna --

1

Q.

```
のはくせるくはの
```

```
community college classes. Like, Duff McKagan did
1
2
   that.
3
          Q.
              Right.
          Α.
              He's an MBA now.
4
5
              Right.
                       That's right.
          Q.
6
          Α.
              He's an MBA. What got --
7
          Q.
              Duff McKagan is an MBA now?
8
          Α.
              He's, I'm sorry, he's two credits shy of an
   MBA.
10
          Q.
              I didn't know that.
              He woke up with a, an exploded pancreas and
11
12
   an abscess, you know, after years of excess and said,
   "I'm done. I'm getting sober."
13
14
          Q.
              Right.
              Thought he could, because he was in Guns
15
16
   N' Roses, get into a really fancy business school.
17
   Couldn't.
18
          Q.
              Right.
19
              Started going to this community college,
          Α.
20
   was able to apply things immediately. Got sober, right,
   and now runs this thing called Meridian Rock and he's
21
22
   a fucking hero in my eyes.
              Wow. Yeah, that's great!
23
24
           A. You know, like, I mean, there's a lot of
   discipline. You know, you get rewarded for, like,
```

sleeping with, you know, twins, their moms, in every 1 2 hole --And all of a sudden you change it up. 3 4 A. -- and change it up, and now you're running other rock stars' money --6 Ο. Yeah. 7 A. -- and everyone knows Duff's not going to fuck, fuck with you. Duff was in a band called The Farts, for God's sake, you know? 10 Right. Q. 11 Α. He's not going to screw with you and --12 Why, why is he not going to screw with you Q. 13 because he's been in a band called The Farts? 14 A. Just because he's Duff. He's punk rock. 15 He's one of us. How could he screw with us? Well, you know, I mean, you don't know that, but you assume that he's one of the good guys. A. Yeah, you would assume that he's one of Q. Is that the way you see the world? artists are the good people and the, and the

1	Q. You think so? You think all businesspeople
2	are like
3	A. No, I have this agent that I love now. He's
4	the first agent I've had in a long time that I truly
5	trust.
6	Q. Do you think maybe you
7	A. His name is Jeff Franklin. I want to get
8	his name in there.
9	Q. Do you, do you think you're attracted to bad
LO	people because then the drama continues sometimes?
11	Like, if you had a calm life it wouldn't be as
12	interesting?
13	A. I think that when it comes to men and
l 4	lawyers I have terrible tastes. I think when it comes
15	to friends I have the best taste ever.
16	Q. Are you seeing anyone now? You talk about
17	your personal life. Do you have a man in your life?
18	A. I don't talk about my personal life.
19	Q. No, I'm saying when you, you know, you say,
20	you say men, it's been a disaster, and so
21	A. Well, not lovers.
22	Q. Well, what are you referring to when you
23	say men?
24	A. Boyfriends.
25	Q. Exactly. Lovers or boyfriends.

A. -- when we, when we can, you know, just,

```
1
   just (unintelligible).
             No, but there's a lot to be said for that,
2
          Q.
3
   in a way. You know, that, that you try harder, and
   you, and you care in bed, and you're into it, and
   you're into making love, and that's a beautiful thing,
   and I don't know. What goes wrong? You would like to
7
   be married again and in a deep relationship, right?
8
              No, I don't think I want to get married
9
   again, no.
10
              Do you think a guy could put up with you?
11
   You're such a strong force. You're such a personality.
12
              I am such a pussy.
          Α.
13
              Are you a pussy?
          0.
14
          Α.
              Kind of.
15
              A pushover.
          Q.
16
          Α.
              A bit of, yes.
17
              How did you end up doing LSD when you were
          Q.
18
   three years old?
19
          Α.
               Four.
20
              Four. How did that happen?
           Q.
21
              My father gave it to me.
22
              Do you think that you were parented so
23
   poorly that the hardest thing in life for you to do
24
   was to be a parent because you didn't have any good
25
   life lessons in that?
```

```
Well, I'm really good with my daughter
1
          Α.
2
   right now.
3
          Ο.
              I heard.
          Α.
              Really good.
4
              But you won't see each other. You'll only
5
   tweet each other.
6
7
              No, we e-mail, too --
          Α.
8
              Oh, you do?
          Q.
              -- and we phone call.
9
          Α.
10
          Q.
              Is that --
11
              MS. QUIVERS: Oh, it's getting more
12
   intimate.
13
              MS. LOVE: Yeah, we're phoning, we're
14
   e-mailing, and --
15
          Q. BY MR. STERN: How painful is that?
              What? It's not painful. It's great.
16
             Is it, though? Like, don't you want to
17
18
   just --
19
          A. It was pain, it was painful when she was
   gone. That was like, like not having a limb.
20
21
          Q. Why do you think she doesn't want to see
22
   you, though?
23
          A. She, well, I, I lived in L.A. so --
24
             You don't go to L.A. at all?
          Q.
25
          Α.
               I went, and then she was doing something,
```

```
1
   doesn't --
2
          A. If it's, but it would have destroyed her
   life.
3
          Ο.
              You think so?
5
              Oh my God. I mean, look at these kid
   castoff, you know --
6
7
              What's her life now, though? I mean, is
          Q.
   she --
8
          Α.
              She's an artist.
10
          Q.
              Right.
              She's living a happy life. She's --
11
          Α.
              What's an artist? Painter?
12
          Q.
13
          Α.
              She's, she's drawing mostly --
14
          Q.
              Drawing.
15
              -- drawing, and it's, like, sort of graphic
   novels she's into, kind of a niche thing, but it, it
16
   works for her. It's what she wants to do --
17
18
          Q.
              Right.
19
             -- and she doesn't want anything to do with
20
   being Kurt Cobain's daughter or Courtney Love's
21
   daughter and she's really working on that and --
          Q. What does she do when she meets other kids
22
23
   her age and she, does she hide the fact that she's
24
   Kurt Cobain's daughter and Courtney Love's --
25
          A. She's really, really picky about who she
```

No, but that Dave was talking about it.

lets into her life.

1

1	Q. About fucking.
2	A. I don't want to use that word.
3	MS. QUIVERS: Not with Frances. Was
4	MS. LOVE: He was (unintelligible) he was,
5	apparent, apparent, allegedly
6	Q. BY MR. STERN: Right.
7	A from my impeccable source, who I'm not
8	going to give away, but he's impeccable
9	Q. Right.
10	A Dave was making dirty, just saying things
11	that weren't appropriate
12	Q. See, because I know Dave, I
13	A so I could, I could fucking kill him for
14	that.
15	Q. I've got to tell you, but, but it turned
16	out it was all false and you had to apologize to your
17	daughter and say
18	A. I had to apologize because it was all
19	public, but the reality is, did Dave say these, these,
20	these, these kind of dirty things?
21	Q. Did you ask Dave before you tweeted it?
22	A. What, I have Dave's number? He has mine?
23	Q. I, I thought you guys do because you have to
24	discuss Nirvana business.
25	A. No, we don't.

51/16/14

```
Q. And not at all?
A. We're supposed to.
```

Q. Right.

3

10

11

- A. By law we're supposed to have three meetings a year. We don't.
- Q. Why not? Because you guys can't stand each other?
- A. Well, you know, I once tried to, like, have lunch with him and he went on here --
 - Q. Right.
 - A. -- he came in here --
- 12 Q. Yeah.
- 13 A. -- and he laughed at it and --
 - Q. I think he considers it too painful.
- A. That's what, you know, I was talking to Pat

 16 Smear about this, and Pat was my friend first --
- 17 Q. Right.
- A. -- and Pat was in Nirvana, and then Pat is in the Foo Fighters --
- 20 Q. Right.
- 21 A. -- and Pat said, "You know, Courtney, it 22 could all be the lawyers."
- 23 Q. Yeah.
- A. "It could all be the lawyers." Because
 it's not about, it's not about Yoko stuff. It's about

```
money stuff.
1
2
          Q. Well, and to be clear, though, Dave's point
3
   was, your daughter even said, "Dave said nothing
   inappropriate, he never hit on me," and Dave even said,
   "Look, it's too ridiculous to even comment on. I
5
   would never hit on Frances. That was, there was nothing
7
   lewd or lurid about the meeting," and that, so, to me,
   I think you should have called up Frances and said,
   "Gee, did anything going on between you and Dave? Was
   anything inappropriate done?"
10
11
          A. We weren't talking then so --
12
          Q.
              Yeah.
13
          A. -- that would have been, you know, that was
   kind of stupid. I admit that that was kind of
14
   stupid --
15
16
          Q.
              Right.
              -- but if I do find out that it's true, you
17
   know, I'm going to smack him, but the fact --
18
19
          Q. You, you wouldn't let your daughter with
20
   Dave?
21
              No, no, no. She's not going off with Dave.
          Α.
22
   She's got a, a, a fiancee that she loves.
23
          Q. Aren't you impressed that Dave was able to
24
   make a music career outside of Nirvana and have this
25
   big band Foo Fighters or are you just --
```

-- but I thought they were doing a Nirvana

song with Paul McCartney, which I thought was, like,

Yeah, I didn't know how big they were.

24

Α.

```
1
   thing if they were going to do, like, Teen Spirit or
   something. I thought that was just cheese.
2
3
          Ο.
              But isn't that a tribute to Kurt and his
   music and, like --
5
              But they didn't do it, Howard, so --
6
          Q.
              No.
7
          Α.
             -- you know --
              So what did they do? I don't even
8
          Q.
   remember.
10
          Α.
              Are you getting Republican or something? .
11
              No. What song did they do together? I
          Ο.
12
   don't remember.
13
              No one remembers, I don't think.
          Α.
14
          Q.
              Do you remember?
              No, but it wasn't --
15
16
          Q.
              Did you watch it?
17
              No. I wasn't even invited.
          Α.
18
          Ο.
              You weren't even curious?
19
              No. I should have broke into the thing again
          Α.
   and said, "Fuck you."
20
21
              Are you in the Rock And Roll Hall Of Fame?
           Q.
22
              No. You don't get in there you've been in
23
   the business twenty-five years.
          Q. So how, I mean, it seems to me, when was the
24
   first Hole album?
25
```

```
1
              I'm eligible for it in three years but --
          Α.
2
          Q.
              In three years.
3
              Yeah, and then, and Nirvana's eligible in
   it for three years, in three years, and I don't know --
4
          Q. Do you think you'll go into the Rock And
6
   Roll Hall Of Fame? Do you think they'll --
7
              Eventually, yeah.
          Α.
8
          Q.
              I think you should.
              Yeah, definitely --
9
          Α.
              I think you should be in there.
10
          Q.
11
              -- but at the same time I was talking with
12
   Billie Joe Armstrong about two years ago, he was
   inducting The Stooges, and I hadn't been invited.
13
14
          Q. You think you should have been there for the
   induction of The Stooges?
15
16
          A. Yeah. I don't know what the problem is.
   It's, like, "Yo, excuse me." Because, I mean, some
17
18
   of the people who were going were, like, Plutocrats
19
   and, like --
20
             In other words --
          Q.
21
              -- my friend that owns hotels went and,
22
   like, you know, like, people like that --
23
              Would you have let --
          Q.
24
          A. -- who don't know really about rock and
25
   roll.
```

```
Q. Would you like to have performed some
1
2
   Stooges music with your band?
3
          A. No, I would just like to be there for the
   Stooges's induction, and the Stooges are a huge thing
   for me, so --
              So why do you think they didn't invite you?
 6
          Q.
7
              I don't know. Maybe I'm on Jann's shit
          Α.
   list or something.
          Q. Are you on Jann's shit list?
 9
10
              I don't know. He sent me this thing to
11
   sign about three weeks ago, it was, like, an old
   Rolling Stone cover, and I'm doing a Rolling Stone
12
13
   piece, so --
             So I don't think he's --
14
          Ο.
15
          A. -- and I run into him at, like, galas. You
   know, you and I both do fancy stuff on the side.
16
             But maybe they didn't think of you.
17
18
   Maybe --
19
              You and me, I never run into you at this
          Α.
20
   shit. So, you know, New York --
21
              What shit do I do?
          Ο.
22
             You do, like, New York Gala For Children.
23
   see you --
24
              No, I don't.
          Q.
25
          A. -- I see you out. You do little society
```

Q. I go, I do? A little bit, yeah. 3 All right. Well, I'll run into you at 4 Q. 5 these things, I guess, if I ever do them. 6 I guess so. I mean, I do a little of it, 7 too. 8 Q. Yeah. Of course. Α. Yeah. 9 10 Well, if it's fun for you --Q. You know, it's good to contribute, it's good 11 to auction, it's good to give back, yadda-yadda. 12 13 Q. All right. So let me understand what's 14 going on with, with the, the business of this Nirvana 15 thing, the only reason I'm getting back to it is you were critical because they, see, I don't get the 16 17 whole business. The Muppets --18 A. See, I just got ripped off for so much money and the Muppets thing brought me to my knees. I had no 20 say in that. 21 Q. Okay. So the Muppets recorded a Nirvana 22 How do you have -song. 23 A. And made Kurt into a Muppet. 24 So how do you not have a say in that? Q. You're the, you have fifty percent of the rights. 25

stuff.

1

1	A. They took the management away from me and
2	Frances because (unintelligible)
3	Q. Who took the management away from you?
4	A. A bunch of lawyers, man.
5	Q. How can they do that? If you own, it's
6	like, what is it, is it communism where they cut
7	A. It was, like, split, it took them a few
8	years and, but it was slowly by degrees
9	Q. So who owns, who made the decision to put
10	the Muppets with Nirvana?
11	A. I have no idea. A guy named David, a guy
12	named David
13	Q. Right.
14	A who works for a guy named John, Esquire,
15	Esquire
16	Q. And they are, were somehow able to say, even
17	though, that's like saying they went into your bank
18	account and took the money.
19	A. Yeah.
20	Q. This is what you're telling me?
21	A. It brought me to my knees. I didn't know
22	what to do.
23	Q. I don't get that. Are you sure you didn't
24	sell the rights or, or
25	A. No, no. The, the, two weeks before

```
01/16/14
```

```
1
   Battleship, that movie Battleship had offered about
   five million for Teen Spirit, and the Muppets I think
2
   made a hundred and fifty grand. That's not fiduciary
3
   duty, so --
5
          Q. Yeah. I, I still don't get --
6
          A. -- and to see Kurt as a Muppet, I, I, I
7
   just started sobbing.
8
          Q. I wish you could explain, you, when you saw
   it you started sobbing when you heard the Muppets
10
   had --
11
          A. I, I, I fell on my knees and I went, "I
12
   give up. I'm jumping off a bridge. This is" --
13
          Q. That's when you usually call me, but you
14
   didn't.
15
              I know. I said, "Call the Governor,
16
   please" --
17
              Yeah.
          0.
18
          A. -- and I still, Howard, to this day, you
19
   know, me and Frannie were talking about this. Like, I
20
   said, "Listen, I don't have that lawyer yet, you know?
21
   When I find," I went to this party in Southampton last
22
   summer, it was Russell Simmons's party, and I was,
23
   like, "I need to find a litigator. My next boyfriend's
24
   got to be a litigator."
25
          Q. Why not just hire one? Why does he have to
```

A. I don't know. It was, like, in the middle

```
E1/16/1
```

```
of the night, the East Village. I got a tattoo the
1
2
   way you're supposed to. At least I didn't get it like
 3
   a poseur.
              When you get a tattoo, oh, okay --
 4
          Ο.
 5
              It's because I'm in, you know, like, like --
              Wait, wait, I want to understand this --
 6
          Q.
7
              -- plan it out and, like, you know, go over
          Α.
   your drawings with --
9
              MS. QUIVERS: Like, you'll think about it
10
   five months --
              MS. LOVE: -- trendy, exactly, Robin.
11
12
   Like --
13
          O. BY MR. STERN: You don't like that?
14
          Α.
              No.
15
              But if somebody goes in there --
          Q.
16
              It should be in the East Village, it should
   be by a sailor who doesn't know what the fuck he's
17
18
   doing, and then you get it cleaned up by one of those
19
   trendy guys later.
20
          Q. So you're telling me you walked into just
21
   a, a random tattoo place? That's the cool way, that's
22
   the rock and roll way to do it --
23
              That's the proper way to do it.
          Α.
          Q. -- and you said to him, "Put Let It Bleed on
24
   my arm!" --
25
```

```
That's exactly what I'm talking about"
1
          Α.
              -- because, what, you felt you had been
2
          Q.
   wronged by the world and you were bleeding and, and --
3
          Α.
              Yes --
4
              -- that was it? That was it?
5
          ο.
6
              -- but I was also back then taking Adderall,
   which is meth, it's, it's, it's amphetamine salts, so
7
   that's some --
8
              What are you taking now? Are you drug-free?
9
          Q.
10
          Α.
              Ambien. I take Ambien to sleep.
11
              Every night?
          Q.
12
          Α.
              No.
13
              Why do you need to take Ambien?
          Q.
              Don't you ever take Ambien on the plane?
14
          Α.
15
              No. Very rarely. I've done it, I have a
          Q.
16
   bottle, it's lasted me seven years.
              Mine hasn't lasted seven years. It's
17
18
   lasted, like, six months though.
19
          Q. Okay. So you're not taking Ambien all the
20
   time.
              No, because it does make you, if you, if
21
          Α.
22
   you stay up you get freaky.
23
          Q. Crack was the greatest drug you ever took in
24
   terms of drugs?
          A. No, I hated it!
25
```

- Q. Did you? I thought you said you -
 A. No. I know I called in a lot and wa
 - A. No. I know I called in a lot and was out of my mind, but, like, you know, back then remember you were still on 92.3 and they didn't have TMZ.
 - Q. Right.

3

6

7

9

10

13

14

- A. So I didn't get into all that crazy Lohan trouble, right? I mean, I got taken to Bellevue and that was the end of the crack.
- Q. Right. You went to Bellevue, they cured you of your crack problem.
- A. Well, going to Bellevue is a pretty easy way
 to get someone off crack because, like --
 - Q. In other words, because you see such horrible things that you realize --
- A. I saw hermaphrodites, you know, they, they, black, white, with fecal matter, talking to Satan, manacled to the wall. It was --
- 18 0. So --
- 19 A. -- I didn't need to see that shit.
- Q. -- that was your rock bottom?
- 21 A. That was gross, man. Yeah.
 - Q. What about heroin? How'd you get off that?
- 23 A. That was easier. I gave, on Larry Flint,
- 24 which was fourteen years ago, I gave Milos Forman my
- 25 word that I wouldn't do it again and I never did it

```
1
   again.
          Q. Larry Flint wheels up to you and says,
2
3
   "Don't ever do heroin again," and you said, "Okay,
   I'll never do it."
4
              No, Milos Forman, the director.
5
6
          Q.
              Oh, because you were going to be in a
7
   movie --
8
          Α.
              Yeah.
              -- and you said, "The movie's more important
9
          Q.
   to me than the heroin" --
10
11
          Α.
              Yeah.
12
          Q. -- and did you go through a cold turkey
13
   experience?
14
          A. Yeah, and I lost thirty pounds, and I
   stopped Valium and heroin in the same thirty days.
15
16
               Why do you think you became a drug addict?
           Q.
17
               I don't really know because --
           Α.
               Bad childhood?
18
           0.
19
          Α.
               No.
20
               If your dad gives you L --
           Q.
21
           Α.
               I'm too, I'm too Jewish to really --
22
           Q.
               Are you Jewish?
23
              You know I'm Jewish.
           Α.
              I didn't know that.
24
           Q.
25
              For God's sake --
           Α.
```

```
1
          Q.
              Courtney Love is Jewish?
2
              Yeah, like, the name Love.
          Α.
3
          Q.
              Lovawitz (phonetic)? What --
4
          Α.
              It's a fake name, Howard.
              What is your real name?
5
          Ο.
              It was Harrison when I was born, but my, my
6
          Α.
7
   grandmother on my mother's side is Jewish and it's
   Jewban (phonetic), so she's Jewish-Cuban --
9
          Q.
              I see.
10
              -- and it's a weird long name that was
11
   changed to De La Sola (phonetic) --
12
        , Q.
              Were they bad parents?
13
              My parents? I didn't really know them.
          Α.
14
   was --
15
              How did you now know them?
          Q.
16
              Because I was at boarding school at nine.
          Α,
17
               They sent, they had the money to send you to
18
   boarding school?
19
               Oh, my mother was really rich!
          Α.
20
           Ο.
               Do you still, is your mother still alive?
21
              Yeah, and writes books about me and shit.
           Α.
22
               Oh, so you're not talking to her?
           Q.
23
               No, I don't talk to her or Dad because
24
   (unintelligible).
25
           Q. Well then of courser that's why you do
```

```
1
   fucking drugs.
2
          A. No, I didn't, no, Howard --
3
          Q. You don't know your mother and she writes
   books about you.
4
          A. -- I, I did heroin, the first time I did
6
   heroin I didn't like it.
7
          Q. You did heroin at a party. Were you at
   Charlie Sheen's house the first time you did heroin?
          A. No, that's a myth!
9
10
          Q.
              Where were you?
              There's a picture, if you look online under,
11
12
   if you look Jennifer Finch, Courtney Love, she took a
13
   picture of me and Flea's girlfriend, I was in Flea's
14
   apartment --
15
          O. Yes.
             -- and this girl Beth, who was dating Flea
16
17
   at the time, it was the first time I ever did it --
18
          Q.
             Right.
19
             -- and I'm sitting there going like this
20
   kind of thinking --
21
          Q.
             Nodding off.
22
          A. -- and, and Beth, nodding off, but Beth's
23
   sitting there smiling. You can, which one went to
24
   rehab first? Beth went to rehab first --
25
          Q. Yeah.
```

```
1
          Α.
              I didn't like the smell or anything.
2
          Q.
              So you had a person --
              I always had a dude do it --
3
          Α.
              You had a dude. You --
4
          Q.
 5
              -- or, or Jennifer Finch.
          Α.
6
          ο.
              Were you doing it every day?
7
          Α.
              No offense, Jennifer. No. No, no.
8
   took a long time. When I was twenty-two before I was
   a rock star I had a problem that me and my friend
10
   Jennifer started an AA meeting --
11
              Right.
          Ο.
12
          A. -- that was our own, and we kicked it, and
13
   that was the end of that, and then it was --
14
          Q. How hard is it to kick? The physical
15
   aspects of it?
16
              Not, it's not bad.
          Α.
17
          Q.
              Really?
18
          Α.
              It's, I mean, it's bad --
19
              Why do we see movies where guys are shaking
          Q.
20
   and --
21
               I know. It's so lame. You know what's,
          Α.
22
   what's way harder to kick? Xanax and Valium.
23
          Q. And those are so-called legal prescription
24
   drugs.
25
              MS. QUIVERS: Prescription drugs, yeah.
```

```
1
              MS. LOVE: Yeah, and booze. Booze.
2
          O. BY MR. STERN: Wow.
3
              Robin, you know this. Booze.
              You don't drink at all now?
4
          Q.
5
              I never did drink.
          Α.
6
          Q.
              No kidding? Not at all?
7
          Α.
              Never.
8
          Q.
              I would think you would have.
9
              I found a picture of me with a whiskey
10
   bottle and I'm like, "What? I look like Tommy Lee,"
   but I swear to God I was never a drinker. I'm just
11
12
   not. If I, if I do drink once in a while I'll have a
13
   tequila shot.
14
              Do you love rock and roll?
15
          Α.
              I live for it.
16
              So are you disappointed with what's going on
          Q.
17
   with rock? Rock is, is dead in a sense, isn't it?
18
          Α.
              It's kind of dead, isn't it?
19
              It's dead. It's died.
          Q.
20
          Α.
              I'm touring. I'm, I'm starting touring on
   June 20th I tour.
21
22
              Now, is that a good idea for you to be
23
   touring?
24
          Α.
              Yeah.
25
             Do you think your health could be
          Q.
```

```
@1/16/14
```

```
compromised? I'm talking about your mental health and
1
2
   also drugs --
              No, it makes me feel better.
3
              When you tour?
4
          Q.
5
          Α.
              Yeah. I, I -- :
6
          Q.
              I, the picture --
7
              -- can't stand the whole socialite
          Α.
8
   (unintelligible).
          Q. The series of pictures that I look at to,
9
   to this day, and not in a pervy way, but in almost like
10
11
   I'm amazed, you were on stage, you had no panties on --
12
          A. No, I did wear panties. They were just
13
   very, I quess, skimpy.
14
             Yeah, hold on. Look at this picture.
          Q.
15
              You always have accused me of not wearing
          You've shown me this before.
16
17
              No, I haven't.
          Q.
18
              You can't see my pussy because I am wearing
19
   panties!
20
          Q. I'm going to show you your pussy. Here you
   are on stage. (Unintelligible). All right. Let me
21
22
   see if I (unintelligible).
23
          A. Oh my God, Stern. I've got glasses on, too.
24
          Q. Let me see if I can see your pussy, as you
   call it.
25
```

That is not my pussy! That is a strip of

Towards the end were you and Kurt making

2

```
1 A. -- it wasn't the right thing to do.
```

- Q. Right. You were left.
- A. It felt like, he was so young, Howard. He was twenty-seven --
 - Q. I know. It, but it was --
- A. -- and you think you're ninety when you're twenty-seven, but you're not.
- Q. -- so sad if he could have been saved

 9 because he maybe would be enjoying his life right now.

 10 Yeah.
- A. Yeah! I mean, look, all he had to live through was, like, Eminem, which he would have thought, he would have probably liked.
- Q. Do you think, do you think it would have disturbed him to live through Eminem?
- A. It would have disturbed him to live through Limp Bizkit.
 - Q. Really?
 - 9 A. I can say that with authority.
 - Q. You think so?
 - A. Yeah.
 - Q. Why?
- A. Limp Bizkit was kind of the end. I don't
- $24 \mid \mathsf{know}$. Limp Bizkit was just sort of the end of it, man.
 - Q. You think --

Q. What do you think of the state of porn?

```
1
               Well, there's a whole, like, sort of artsy
 2
   movement, like Williamsburg hipster porn now.
 3
           0.
               Really?
 4
           Α.
               Yeah. There's, like, hipster porn.
 5
               What is that?
           Q.
 6
          Α.
               You know that show Girls?
 7
          Q.
              Yeah.
 8
               There's, like, girls that look like that
   that are kind of, you know, not afraid to show their
 9
10
   jiggle parts and they're wearing, like, horn-rimmed
   glasses and have kind of greasy hair --
12
          Q. Yeah. It's not glamorous.
13
          Α.
              -- like from an Urban Outfitters catalog.
14
          Q.
               Do you watch the show Girls?
15
              I've watched it a few times, yeah, My
          Α.
16
   friend Jemima's on it.
17
              Yeah, I thought you would like that.
          Q.
18
          Α.
              Yeah, it's --
19
              It's hard to please you. You never know
20
   what's cool with you or not. You're, you're sort of
21
   a (unintelligible) --
22
          A. You please me.
23
          Q.
              Do I?
24
              Yeah. I have three things to do here today.
          Α.
25
   What is, I know what Lithium is.
```

```
Right.
1
          Q.
2
          A. I'm doing that, but I'm playing all chicks,
   and I'm not playing myself and I'm not playing Nirvana
3
   and --
5
              Whoa, whoa, whoa, whoa. What, what --
          Q.
              MS. QUIVERS: What did you just say?
 6
7
          Q. BY MR. STERN: What did you just say?
8
              I'm not playing Nirvana and I'm not playing
   myself.
9
10
              What, what, what about Lithium? Are you on
          Q.
   Lithium?
11
              Yeah, I'm going to, I picked ten songs, I'm
12
          Α.
13
   going play them today, but the show --
14
          Q.
              You're on Lithium?
              Yeah, after this, but the show I'm on after
15
          Α.
   this is called Opie and Anthony.
16
17
          Q.
              Right.
18
          Α.
              What is that?
19
              That's, that's a radio show here. It's two
          Ο.
20
   guys who --
21
          Α.
              Are they shock jocks?
22
              Absolutely they are.
          Q.
23
              Are they, are they, are they are they going
24
   for your crown? Are they shock jocks?
25
          Q. They're not, well, I think --
```

```
BI/35/18
```

```
MS. QUIVERS: Well, they tried and they
1
2
   missed.
3
              MS. LOVE: What kind of shock jocks? Are
   they going to ask me about Vivid girls? I mean, you
5
   can.
6
          Q. BY MR. STERN: I don't, I, I don't know. I
   don't know what they're going to ask.
8
          A. See, I like you. I'll, I'll, I'll answer
   anything of yours, but if they're, if they're brats
10
   I'll kick them.
          Q. Well, you know, look, the thing is that you
11
12
   and I know each other a long time.
13
         A. Yeah, I once asked you to call the Governor
14
   for me.
15
          Q. Oh, you're going, you're going on, yeah --
16
              MS. QUIVERS: Yeah, she's not on Lithium,
17
   Howard. She's going on the radio channel.
18
          Q. BY MR. STERN: Right, you're going on the
   radio channel Lithium.
19
20
          Α.
             Oh, yeah, no, I'm not on the drug.
21
             Oh. I didn't know what you were talking
          Q.
22
   about.
              MS. QUIVERS: Yeah, I wanted to, to clear
23
24
   that up.
25
             MS. LOVE: No, this is, seriously,
```

```
1
   Lithium --
2
          Q. BY MR, STERN: See, I'm trying to figure out
   what the hell you were talking about.
3
          Α.
              -- named after a Nirvana song --
 4
 5
          Ο.
              I see.
6
             -- and I have to pick, I picked ten songs
7
   from the nineties --
8
          Q.
             Yeah.
              -- and I just picked chick songs.
9
10
              Do you, when is the last time you were with
          Q.
   a man? Has it been a long time?
11
              About a week-and-a-half.
12
          Α.
13
              Oh, so you're seeing somebody.
          Ο.
14
          Α.
              Whatever.
15
              Some random guy or is it, like, a guy --
          Ο.
16
              Yeah, just random guys. A sailor I picked
17
   up at the, in a dock.
18
          Q.
              No, stop that. No, really. Where did,
19
   where did you meet this guy you are with?
20
              No! No, baby! No! I never --
          Α.
              What is, "No, baby?"
21
          Ο.
22
              Because I don't kiss and, I don't do this.
          Α.
23
              I'm not asking who it is. I'm saying --
          Ο.
24
              I, I, but even, you know, I can't.
          Α.
25
              Had you been with him before or was it a
          Q.
```

```
first time?
1
2
          A. No, it was, I've been, yeah, I've been
3
   around there.
              A couple of times?
          Q.
          Α.
              Yeah.
5
              So are you falling in love?
6
          Q.
7
              No. It's so, how do I do this? I know.
          Α.
   I'll pretend I'm Jacqueline Onassis.
          Q. No, but what's going on with you? You
9
   don't, you don't want to be in love so you just need
10
11
   to every once in a while fuck a guy?
12
          A. No, I just don't like to talk about it.
13
          Q.
              Are you lonely?
14
              No. I have my band.
          Α.
15
              Who is in your band now? You're not calling
          ο.
16
   it Hole anymore.
17
          A. No, I'm calling it Courtney Love because I
   just gave up on people criticizing, unless Melissa
18
19
   comes back.
          Q. What do you mean, you gave up people
20
21
   criticizing it?
22
          A. Well, it was just like, you know, they
   wanted, like, not the original lineup but the
23
   Celebrity Skin lineup, and Melissa I would take back,
24
   even Patty I would think about taking back, but Eric
25
```

```
I'll never take back, so --
1
2
          Q.
              Why not?
3
              He stole seventy-four quitars from me and
   Frances and --
4
              Well, let's, let's say that's alleged.
5
          Q.
6
              No, it's not alleged. It's a factual thing.
          Α.
7
              Yeah, but (unintelligible).
          0.
8
              I have the cardage. It's actually with a
9
   lawyer right now.
              Well, maybe he feels that he didn't take
10
11
   them but they were his. Maybe he feels that way.
12
              No, eighteen of them were left-handed and
13
   were Kurt's, and have serial numbers that match Kurt's,
14
   and he took a bunch of crates, then he put them in
15
   storage, and he won't give them back, and then he wants
16
   to do a reunion tour, and I'm not, I have a friend
17
   who's in a Bad Company, he was in Bad Company --
18
          Q.
              Did you ask him for the guitars back?
19
          Α.
              Yeah!
20
              And he says that they're his, right?
21
               I went, he, he stole them from my, my
22
   Lower Camden storage under my name.
23
              Well, let's just say again because I know
24
   you get into trouble for this.
25
          A. Alleged. Alleged.
```

```
Q. Well, it's not alleged. I mean, he might
1
2
   have a side of it that says, hey, this is something he
3
   was entitled to. I'm just putting that out there, you
   understand?
5
          Α.
              No.
              You won't (unintelligible).
6
          Ο.
7
              The, the, the cardage, the cardage sign
          Α.
   says "Courtney Love's storage, dah-dah-dah-dah.dah,
   this date, November 2003." I mean, I only going out
9
   about this in 2011 because --
10
          Q. Courtney, look, is it difficult to be in a
11
   band with you?
12
13
              No!
          Α.
              I mean, you are a very strong person who --
14
          Q.
15
              No, I'm really fun to be in a band with.
          Α.
              But you're also very dominant and you. I
16
          Q.
   don't think you, you sometimes can entertain somebody
17
18
   else's opinion. Is, is that, would that be accurate
19
   with you?
20
          A. No, my band's allowed to smart off to me as
21
   much as they want --
22
           Q.
              Right.
23
           A. -- as long as they know what they're talking
24
   about.
25
          Q. Okay. So, so you're going to go out on
```

```
tour.
1
2
          Α.
              Yeah.
3
              By the way, before we get to the tour, you
   claim to have been Lindsay Lohan's life coach.
4
5
              No! I never claimed that!
              She says she barely knows you, but you say
 6
7
   you got, you helped to get her into rehab.
8
          Α.
              I barely know her.
 9
              Oh, you do?
          Q.
10
              No, I, I've spoken to her directly twice --
          Α.
11
          Q.
              Right.
          A. -- and then through an intermediary because
12
13
   she kept blabbing about this, it was getting planted
14
   everywhere. I, I, all I said was she should dye her
15
   hair back to red to the intermediary and all of a
   sudden I'm her sober coach? It's like --
16
17
              So that's not true?
          Ο.
18
              No --
          Α.
19
              And why are you in a --
          Q.
20
          Α.
             -- but I do sometimes talk to the
21
   intermediary about stuff because, I mean, she's clearly
22
   in need of help.
23
          Q. But why do you care about Lindsay Lohan so
         Because she's famous or be --
24
25
          A. No. Because people pick on her. I don't
```

```
B1/16/14
```

```
like seeing people bullying other people.
2
          Q. You get upset about that?
3
              Yeah, I don't like it.
              You want to help her. You want to reach out
4
          Q.
5
   to her.
6
          A. Yeah, but I don't know what, where it's
7
   going to go but --
8
          Q. Were you trying to help this girl, Amanda
   Bynes, who was a child star --
9
              Oh, the one I stuck up for her yesterday.
10
11
          Q. Well, you, you tweeted, again with Twitter,
   you said, "Hey, Amanda, you better get your shit
12
   together, dude."
13
             I wrote, "Pull it together, dude." Yeah.
14
          Α.
              Dude?
15
          Q.
16
          Α.
              Yeah.
17
              Calling her a dude is an insult, right?
          Q.
18
          Α.
              No.
19
              Isn't it? Calling a girl a dude?
          Q.
20
          Α.
              No.
21
          Q.
              Isn't a dude a guy?
22
              Robin?
          Α.
23
              MS. QUIVERS: He's picking at things.
24
          Q. BY MR. STERN: Am I, though? No, no, I
   thought it was --
25
```

```
Okay, he's probably being overanalytical.
1
          Α.
              Okay. So you said, "Hey, get it together,
2
          Q.
   dude."
3
              It's actually a term of endearment.
          Α.
   you call a chick a dude it's like --
6
          Q. But is it? We were talking about this
7
   other day. Elton John called out Billy Joel in public.
   When you care about someone to tweet, "Hey, you better
8
   get it together, dude," I, is that really helpful?
          A. I wrote, "Okay, pull it together, dude," and
10
11
   then she wrote --
12
          Q. -- that you're ugly.
13
          A. -- that I'm ugly, which is, like, rolls off
   my back like duck water. When I was fourteen I was
14
   so homely and I thought I was Kate Moss. I mean, ugly
15
16
   seems to be her favorite word, and I wrote --
             She calls everybody ugly, by the way.
17
18
          Α.
              Ugly, and I wrote her back and I was like,
19
   "No, you misunderstood me. I'm not insulting you. You
   know, DM me," which means Direct Message me, and what I
20
21
   was going to do was turn her on to a sober companion
22
   quy that I know --
23
          Q.
              Right.
24
          A. -- if she wanted the help.
25
          Q. Does that ever really work?
```

A. Yeah.

1

2

3

4

5

6

7

8

9

- Q. It does?
 - A. I've seen it work.
 - Q. I remember when Joe Walsh was with a sober companion for years I used to make, it never worked until he really, until the Eagles said, "Hey, you better pull your shit together, dude."
 - A. Right. It's sort of like Larry Flint.
- Q. That's right.
- 10 A. If you know Nicole Kidman's going to get
 11 the part, you lose thirty pounds, get off heroin and,
 12 and, and Valium real fast.
- Q. You know, you, I think you told me this
 first, that, you said to me one time, "Hey, Howard,"
 you know, I mean, we were talking about lesbianism
 and stuff, and you said you had a lesbian affair with
 Kate Moss. No one ever made a big deal about that.
- 18 | Aren't you surprised?
- A. I, I, I, they did make a big deal about it and I never said her name. I looked through the transcripts --
- 22 Q. Right.
- A. -- and I said "a British model."
- 24 Q. Oh.
- A. That could have been Naomi, it could have

11/16/19

```
Years.
1
          Q.
2
              -- but that was, that was ongoing, right?
          Α.
3
          Ο.
              That was then and now we're friends.
              Right. So, so if I say something today
4
          Α.
   that's controversial, you know, it'll, it, it'll be
   over in just a few days, right?
6
7
              Right.
          Q.
8
              I don't want to say anything too, too
   controversial, but my point is the person that did
   this was a P.R. person who hated me, and she went back
10
11
   and she saw that sentence where it said "boarding
   school," I read the transcripts --
12
13
              Right. Yes.
          Q.
14
          A. -- and I wrote to your producer and got the
15
   transcripts --
16
          Q.
              Yes.
          A. -- and it says "boarding school" and it
17
   says "an English model."
18
19
          Q.
              I see. So it never was Kate Moss?
20
              I never said Kate and it never was Kate --
          Α.
21
          Ο.
              But --
22
              -- so the, Kate and me were friends.
23
   didn't go to her wedding over it --
24
          Q.
              Wow.
             -- you know, and it wasn't me.
25
```

2 No, we're okay because I wrote her a letter Α. 3 explaining it was really complicated. 4 Tell me what it was like, though, going down on her. 5 6 I, I don't know. I didn't, I never did it. Α. 7 She went down on you? Q. 8 Α. I, I've never, it never happened. 9 Why are you doing that? Q. 10 Why am I doing what? Α. 11 Q. Tell the truth. Tell me what happened. 12 Α. I'm cloaking myself in Grace, Grace Kelly-ness now. 13 Was it hot? Was it hot or not? 14 0. 15 All my Grace Kelly-ness coming out. 16 been in finishing school for the last three years. That's where I've really been. 17 18 Is that true? Ο. 19 Α. No. 20 I believe it. Ο. 21 Α. Oh, man. 22 Look how, look how together you are. Q. 23 Α. Oh, okay. 24 You went to a doctor, you know, a lot of Q.

people will say, "Oh, Courtney Love is crazy.

Are you no longer friends now?

25

1

Ο.

bipolar or manic depressive I would have said, "Oh,

```
okay."
1
2
          Q.
             "I'll deal with it" --
3
          Α.
              Yeah.
              -- and you're telling me you're not
4
          Q.
   bipolar --
6
          Α.
              No.
              -- you're not manic depressive --
7
          Q.
8
          Α.
              No.
              -- and every, you are the perfectly normal
9
          Q.
10
   person.
              Well, I was a drug addict.
11
          Α.
12
              Right, okay, but aside from that there is
          Q.
13
   nothing that would indicate mental illness?
14
          A. I'm eccentric --
15
              Right.
          Q.
              -- but, I mean, I'm eccentric and I voice
16
17
   my opinions about shit.
18
          Q. But you are not mentally ill. You don't
   hallucinate. You, none of that.
19
20
              No, I don't have voices in my fucking head.
          Α.
21
              Right. So, so why, aren't you proud of
          Ο.
22
   that?
23
          A. Yeah, but I, I also think that, you know, I
24
   mean, you do America's Got Talent, right?
25
          Q. Right. Is it true that --
```

11/16/14

```
1
          A. I'm going to do a big TV show. I'm not
 2
   saying what it is. I --
 3
          Q.
              Is it American Idol?
 4
              I'm not telling you.
 5
              I know that you've hinted that it's
   American Idol.
 6
 7
          A. I'm not telling you. I'm not telling you
   because you know how those people are and we can't.
 8
          Q. Is it a done deal, whatever you're talking
10
   about?
11
             It's a pretty done deal.
          Α.
12
          Q. You are going to be on one of these shows
13
   being a judge?
14
          A. I'm not even going to say what I'm doing on
15
   it, but what I will say is that --
16
          Q. I think that's fabulous.
17
              I think it, I, I was really scared --
          Α.
18
          Q.
              I would tune in, yeah.
19
             -- and I said never ever ever am I going to
          Α.
20
   do it, but I'm going to do it because a lot of people
   in, like, Lubbock, Texas, think that I'm on crack and
21
   it's 2004 --
22
23
          \Omega. If Dave --
24
          A. -- and I'm still calling you asking you to
25
   call the Governor.
```

Q. If Dave Grohl was a judge on a talent showyou would goof on him.

A. Would I goof on him? What's a goof? What's

a goof?
Q. You would. You would. You know what goof

means. You would be, you would be critical of him if

7 he did that.

4

5

6

8

9

10

19

20

21

- A. Well, I know exactly what I'd say.
- Q. What would you say? If I told you Dave Grohl was a judge on American Idol what would you say?
- 11 A. Oh, as a judge --
- 12 Q. Yeah, that's right.
- 13 A. -- on American Idol. He won't even do it.
- Q. Right, but let's say he did that. What would you, you would be critical of him in the same way you were critical that he sold something or, oh, did a song with Paul McCartney. You're very critical of him.

 So why are you doing it?
 - A. Well, it comes out of a money thing with Dave and me --
 - Q. Mm-hmm.
- A. -- and what Pat said, what Pat Smear who's been around him, who was the one guarding Kurt along with Eric, Roddy, and, and Pat were guarding Kurt, like, in his final hours, dah-dah-dah, Lisa Corvy

I mean, maybe. I, I don't know --

-- but if I was in Dave's position, I feel

(phonetic), every time it comes up Dave says, "I have

E1/16/1

22

23

24

25

Q.

Α.

Q.

Α.

Okay.

What if --

```
like Dave, when I asked him to go to lunch, I feel
1
2
   like he, you know, he can. he can afford to be a bitch
3
   and he just keeps going.
4
          Q.
              What do you think he's worth? He's got to
   be worth a fortune.
5
              I actually looked it up online.
6
          Α.
7
              How much is he worth?
          0.
              Well, online was low.
8
          Α.
9
          Ο.
              What did it say?
10
          Α.
              It was, it was four hundred and forty, but
11
   it's more than that.
12
              It's got to be, right?
          Q.
13
          Α.
              Yeah, it is.
14
               I mean, he's got, he's got Nirvana money
   and he's got Foo Fighters money.
15
16
              Foo money. yeah.
          Α.
17
              Yeah, and he's touring.
          Ο.
18
          Α.
              Yeah.
19
              What if this show, I don't know what show
20
   it is, I'm assuming it's American Idol or something
21
   like X Factor because what other shows are there?
22
               There's a few.
23
              What if they have you as a judge and they
24
   put Dave Grohl next to you? How good would that be?
   I would watch that every single week. Would that not
25
```

```
be the best --
1
2
          A. I think you're going to watch this every
   single week.
3
          Q. -- and what, and what if on the same show --
             I want to tell you --
5
6
          Q. -- Kate Moss is under the table having,
   having sex with you! Wouldn't that be hot?
8
          A. Oh, Jesus, Kate. Oh, poor Kate. Kate, I'm
   so sorry about this.
10
          Q. When you came on my show and said you
   sucked Ted Nugent's dick when you were twelve years
11
12
   old, was that --
13
          A. No, I was fourteen.
14
          Ο.
              When you were fourteen. You still stand by
   that statement?
15
          A. I, it's in my book.
16
17
          Q.
              It is?
18
              Yeah.
          Α.
19
              It's documented?
          Ο.
20
              I had to cop, I mean, I said it on the show.
          Α.
21
   It's true.
22
          O. Wow.
23
              MS. QUIVERS: Did he know you were fourteen?
              MS. LOVE: Yeah! That was the whole point!
24
25
   He was on here banging on me and, you know, I put up
```

```
with it for two years and finally, and knowing there
2
   was a line of underage girls who had to go in there
   and there's this, and it's the first cock I'd ever
   seen, and it was just, like, this giant, ugly, nasty,
   gnarly thing and I --
6
          Q. BY MR. STERN: Was it, was it a big cock?
7
          A. No, but I can't really, I can't compare now.
   You know how Disneyland looks really big when you're
   little?
9
10
          ο.
              Yeah.
11
              It could have been teeny for all I know.
12
   All I know is that I was in a yellow tube top with
13
   little rosebud boobies and I should not have been in
14
   that room.
              I feel sad.
15
          Ο.
16
          Α.
              And I feel sad about it, too.
              Why do I feel sad --
17
          Q.
18
          Α.
              I wish I could say to you I walked out.
19
          Q.
              I do, too. So what, why --
20
              MS, QUIVERS: Well, you're the fourteen-
21
              You're not the one who --
   year-old.
22
          Q. BY MR. STERN: That's right. You were a kid.
23
              I know, but there was a line of us, and
24
   there were guys, and it was, like, this demands, like
   Howard Stern On Demand, it was like Ted Nugent On
25
```

```
1
   Demand, and it was, like, you know --
          Q. But it's so sad.
2
3
              -- and so he was on here with his guns and
   his conspiracy theories and finally I was like, "You
4
   know, I'm going to tell my Ted Nugent secret on
   Howard."
6
7
              Sad, I see sadness in your life, so, such
   sadness. Your husband commits suicide. Your, your
8
9
   father gives you LSD when you're four. I mean --
10
              But I'm a pretty happy camper.
11
          Q.
              Are you?
12
          Α.
              Yeah!
13
              Why do I feel sad when I'm around you? I
          Q.
   feel like there must be sadness here.
14
15
               Because you're an empathic man.
          Α.
16
          Q.
              Yeah. I feel sadness.
               You're an intelligent, empathic man --
17
          Α.
18
          Q.
               Yeah, and I feel the sadness here.
19
          Α.
              -- who has an apparently great marriage.
               I do.
20
           Q.
21
                      I'm really proud of you for that.
          Α.
               Yeah.
22
               You're damn right.
           Q.
23
           Α.
               Yeah.
24
               I'm, I'm doing well.
           Q.
               Good.
25
           Α.
```

```
1
              So the tour is going to happen --
          Q.
2
              How's your kids, by the way?
          Α.
3
              My kids are good. So you're going on
          Q.
   tour --
              Yeah, June 20th it starts.
5
          Α.
              -- and, and, and you will do Hole material,
6
          ο.
7
   but not as Hole, but as Courtney Love.
8
          Α.
              Yeah.
9
              Well, I love that material, I would go see
   that show, and where are the cities? You've only,
10
   you're only doing, what, seven cities?
11
12
          A. Like, eleven, and then I'm going to do this
13
   show, and then I'm coming to come back and play bigger
14
   venues, so I'm playing, like, little things, like Stone
15
   Pony and --
16
          Q.
              Right.
17
          Α.
              -- House of Blues and --
18
               That's what the Stones do. They get ready
          Q.
19
   for their tour --
20
          Α.
              Yeah.
21
              -- by playing --
           Q.
22
           Α.
              Yeah --
23
              -- a bunch of small venues.
          Q.
              -- and playing a lot of new material that
24
   I'm going to release, I'm on the same label that
25
```

```
1
   Prince is on --
2
          Q.
              Right.
3
              -- and so Prince is releasing a single and
   then I'm releasing a single after Prince.
4
5
              So you have new music?
          Q.
6
          Α.
              Yeah.
7
          Q.
              And that's what this is all about?
              For me, yeah.
8
          Α.
              And you're doing the smart thing. You're
9
          Q.
   going out and promoting it by playing in front of your
11
   fans.
12
          Α.
              Yeah.
13
              Right, because a lot of guys now go out and
   they just put out an album and they refuse to go on
14
15
   tour and they don't go and support the records.
16
          Α.
              Really?
17
              That's right. A lot of them do.
          Q.
18
   expect to just live on past laurels. You can't do it.
19
           Α.
              Who does that?
20
           Q.
              Well, let's see. McCartney, as much as I
   love him, he's out on tour but --
21
22
           A. Oh, but he's so rich.
23
           Q. -- but he's (unintelligible) new music.
   That's right, but I'm saying, who put out an album?
24
25
   Bowie put out a new album. He didn't go out on tour.
```

```
1
   He didn't.
2
          Α.
              I know, but --
              But what?
3
          Q.
4
          Α.
              Later.
5
              What?
          Q.
6
          Α.
              Later.
7
          Q.
              Later?
8
          Α.
              Yeah. Later.
9
              No, I'm just saying, I'm not, I'm not
          Q.
10
   criticizing him. I'm saying that it's like you still
11
   have to go out and support your new music.
12
          A. Yeah, you do. If, if, I mean, if you're a
13
   strapping and healthy and you can do it, you should.
14
   If you're older and you're a billionaire, why the fuck?
15
          Q. Well, I agree. I'm saying, though, you
16
   still have to go out and sell your music.
          A. Well, the way we make money now is tickets
17
   and T-shirts.
18
19
          Q. Right. Courtney Love's summer tour kicks
   off June 20th --
20
21
          Α.
              Thank you for letting me know that
22
   thought it was the 23rd.
23
          Q. -- at the Theater, well, don't show up on
24
   the 23rd --
25
          A. Okay.
```

```
1
          Q. -- at the Theater of the Living Arts in
   Philadelphia and if you want additional tour dates
2
   and tickets you go to Ticketmaster.com
          A. Yeah, no, and with Ticketmaster, LiveNation,
4
   and ClearChannel, it's all good.
          Q. Right --
6
7
              Everything's cleaned up. No one's mad at me
8
   anymore.
9
          Q. -- and follow Courtney's clothing line,
10
   Never The Bride, on Twitter at NeverTheBrideCL. What
   is that?
11
12
          Α.
              Not quite yet.
              Never The Bride?
13
          Q.
14
              I started these clothes, and they're awesome,
15
   but I need a licensing deal so that's a little
16
   premature --
17
          Q. Okay. I saw you --
1.8
          Α.
              -- but, you know, go for it.
19
          Q.
              Okay. I saw you on The View recently.
20
          Α.
              Yeah.
21
          Q.
              That was strange.
22
              That was really strange. I was booked on
   The View to pimp these e-cigarettes --
23
24
          Q. Right.
25
          A. -- and then they get out this thing, it's,
```

```
like, Kurt and there's Barbara Walters, who's, by the
   way, I've done The View eight times, Howard, I have
   never seen Barbara on The View when I'm on The
   View --
          Q.
              Wow.
 6
          A. -- and she gets on The View and asks me these
 7
   Kurt questions, like, the day he died. I didn't know
   it was the day he died. It was, like --
 9
          Q. Was it the day he died that you were on?
10
          A. Yeah, it was, like, the day he died, and I'm,
11
   like, "Okay, I celebrate his birthday," and it was, I
12
   like The View because Whoopi's on The View --
13
          Q. Right.
14
          Α.
              -- and she's a freak and I love her --
15
              Right.
          Q.
16
          Α.
              -- so as long as there's a freak around I'm
   cool --
17
18
          Q.
              Right.
19
              -- and, and the rest of them were really
          Α.
20
   nice to me --
21
          Q.
              Right.
22
          A. -- and I was just going to smoke this
23
   cigarette on The View and make a whole lot of money
   and then they said --
24
25
          Q. What's a lot of money?
```

```
1
          A. I'm not telling you, but it was definitely a
2
   lot.
3
             Do you mean if you go on The View and smoke
   one of these cigarettes they'd pay you?
4
          A. Well, it's against ABC policy and they
5
   actually were making me, and they confiscated it out of
6
7
   my cleavage, but I wouldn't have done it anyway. I
   mean, it's Barbara Walters. She's pretty intimidating.
   Like --
10
              Speaking of your cleavage, how are your
11
   titties? Are they, are they great still?
              Yeah, they're really good. I don't need a
12
          Α.
   lift yet.
13
              Those are fake, right?
14
          Q.
15
              No, the bottom strip is silicone --
          Α.
16
          Q,
              Right.
17
              -- because I broke the saline ones --
          Α.
18
              Jesus.
          Q.
19
              -- and the rest is natural.
          Α.
20
              How do you break them?
          Q.
21
          Α.
              I was sitting with a tambourine --
22
          Q.
              You hit your titty with a tambourine and
23
   exploded your chest.
24
          A. -- and I was topless in Australia --
25
          Ο.
              What --
```

```
1
          A. -- and I exploded one boob.
2
          Q. Where are you topless playing the
   tambourine?
3
          Α.
              In Perth, Australia.
4
5
          Ο.
              On stage?
6
          Α.
              Yeah.
7
              You, you took your top off?
          Q.
8
          Α.
              Yeah.
              Well, maybe on the tour you'll take your top
9
         Is that possible?
10
   off.
              I'm a little old for that shit these days --
11
          Α.
              No, you're not, honey. You look good.
12
          Q.
              Well, you know, I --
13
          Α.
1.4
              What are you doing? Are you doing any Botox,
           Q.
   any of the, what are you doing to stay youthful-
15
   looking and young?
16
          A. No, I haven't had a fill in, like, four
17
18
   years.
19
           ο.
              No shit?
20
               Yeah, I did it and I looked like a pillow.
           Α.
21
           Q.
               So you're not doing anything?
22
               No. I mean, I had Botox six years ago and
23
   it prevents the line from coming --
24
           Q.
              Right.
25
           A. -- but I, I, look, my family --
```

```
But you don't have a line. You got, you --
1
          ο.
2
              -- they're not attractive but they get fat.
3
              You got facelift or anything like that?
   Look at you.
4
5
              No. I got my nose done.
          Α.
6
              Yeah, but you, that's it because you don't
          Q.
7
   have, you don't have any old lady in you.
8
          Α.
              Yeah, well, I had those crazy lips and I had
   to get the lips fixed.
9
              Yeah. What'd you do to your lips? You blew
10
11
   them up?
12
          Α.
               I blew them up because I had
13
   (unintelligible) --
14
              Why did you do them?
          Q.
15
          Α.
              Well, I undid it, didn't I?
16
          Q.
              Yeah.
17
              This is, like, real right here now.
          Α.
18
              I don't get why women make their lips so
          Q.
19
   fucking big.
20
          A. I was living in Beverly Hills and, and I was
21
   on a lot of pills --
22
             You got caught up.
          Q.
23
             -- and I just got caught up in that shit,
   you know?
              Like, you know, just --
24
25
          Q.
               Right.
```

1	A wanting to look like a trout.
2	Q. That's a hot look.
3	A. Yeah. Koi fish.
4	Q. You look good. You look really good.
5	A. You look good, too
6	Q. No.
7	A and you look content. You look very
8	thoughtful. You're like Rodin, The Thinker.
9	Q. Really?
10	A. You're overthinking stuff. I don't know.
11	Q. Well, maybe (unintelligible) talk to you.
12	A. I feel like I'm not going to get invited
13	back for a while because we're not having, like, the,
14	you know, party in my pants and
15	Q. No, I like to interview you.
16	MS. QUIVERS: Are you kidding? We love you.
17	Q. BY MR. STERN: (Unintelligible).
18	A. All right.
19	Q. I love you.
20	A. I'm just being a little more ladylike than
21	usual because I just, you know
22	Q. I like it. I like it.
23	A trying to be ladylike.
24	MS. QUIVERS: We love trying to drag things
25	out of you.

- Q. BY MR. STERN: Honey --1 2 A. Well, I'm practicing many, my, my finishing school skills. 3 Honey, you're doing great. 5 Α. Oh, good. You don't have to worry about me. Q. 6 7 Α. All right. 8 Q. I'm in your corner. 9 I know you are. Α. Courtney Love is here to tell you she's 10 Q. going back out on tour and she is quite the artist. 11 12 love her music. 13 A. I do a good show. 14 I hope your new music is as good as your 15 old music. I'll be evaluating it. 16 It's damn good. You shall be, and I shall Α. 17 be back. 18 Q. (Unintelligible) write a song about me and 19 let me play it on the air. 20 A. I have to write a song about my, my agent first. He's (unintelligible). 21 22 No, write a song about me so I can play it. 23 How about I write a song with you and Jeff Α.

Q. No, I said a song about me.

around the same time?

24

25

1		A. All right.
2		Q. That's your next song.
3		A. All right.
4		Q. I want to see what you come up with. All
5	right.	Listen.
6		A. Yes.
7		Q. I wish you a lot of luck with your tour
8		A. All right.
9		Q how everything's good
10		A. Okay, Daddy.
11		MS. QUIVERS: (Unintelligible).
12		Q. BY MR. STERN: All right, baby.
13		A. Skipper.
14		Q. Good seeing
15		(End of audio.)
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
i		