

1 BLAKELY LAW GROUP  
2 BRENT H. BLAKELY (CA Bar No. 157292)  
3 1334 Parkview Avenue, Suite 280  
4 Manhattan Beach, California 90266  
5 Telephone: (310) 546-7400  
6 Facsimile: (310) 546-7401  
7 Email: [BBlakely@BlakelyLawGroup.com](mailto:BBlakely@BlakelyLawGroup.com)

8 Attorneys for Defendant  
9 ESSENTIAL CONSULTANTS, LLC

10  
11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 STEPHANIE CLIFFORD a.k.a.  
14 STORMY DANIELS a.k.a. PEGGY  
15 PETERSON, an individual,

16 Plaintiff,

17 v.

18 DONALD J. TRUMP a.k.a. DAVID  
19 DENNISON, an individual,  
20 ESSENTIAL CONSULTANTS, LLC, a  
21 Delaware Limited Liability Company,  
22 and DOES 1 through 10, inclusive,

23 Defendants.

Case No. 2:18-CV-02217-SJO-FFM

**DEFENDANT ESSENTIAL  
CONSULTANT, LLC'S  
NOTICE OF MOTION AND  
MOTION TO COMPEL  
ARBITRATION**

Assigned for All Purposes to the  
Hon. S. James Otero

**Date: April 30, 2018**  
**Time: 10:00 a.m.**  
**Location: 350 West 1<sup>st</sup> Street**  
**Courtroom 10C, 10<sup>th</sup> Floor**  
**Los Angeles, CA 90012**

Action Filed: March 6, 2018

1 **TO THE COURT, ALL PARTIES AND COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE** that on April 30, 2018, at 10:00 a.m. or as soon  
3 thereafter as the matter may be heard in Courtroom 10C, located at the United States  
4 District Court, 350 West 1<sup>st</sup> Street, Los Angeles, California 90012, the Honorable S.  
5 James Otero presiding, Defendant Essential Consultants, LLC (“EC”) will move and  
6 hereby does move for an order compelling Plaintiff Stephanie Clifford a.k.a. Stormy  
7 Daniels a.k.a. Peggy Peterson (“Clifford” or “Plaintiff”) to arbitrate any and all  
8 disputes arising under the written *Confidential Settlement Agreement and Mutual*  
9 *Release* entered into by EC and Clifford on or about October 28, 2016 (the  
10 “Settlement Agreement”), including but not limited to the first cause of action pleaded  
11 in Plaintiff’s First Amended Complaint (“FAC”) in this action. Such arbitration  
12 should be ordered to occur in the currently pending arbitration between the parties  
13 with ADR Services, Inc. (“ADRS”) in Los Angeles, California, pursuant to the written  
14 agreements of the parties. EC will also move and hereby does move for an order  
15 staying the first cause of action in the FAC pending the outcome of the arbitration.

16 This motion will be and is based on this Notice, the accompanying  
17 Memorandum of Points and Authorities, the accompanying Declarations of Michael  
18 D. Cohen and Brent H. Blakely (with exhibits), the anticipated reply papers, all other  
19 papers on file in this action, all materials that may be properly considered in  
20 connection with this motion, and oral argument at the hearing. This motion is made  
21 following the conference of counsel pursuant to L.R. 7-3, which took place on March  
22 21, 2018.

23 Dated: April 2, 2018

BLAKELY LAW GROUP

24  
25 By: /s/ Brent H. Blakely

BRENT H. BLAKELY

*Attorneys for Defendant ESSENTIAL  
CONSULTANTS, LLC*

26  
27  
28