

ERVIN COHEN & JESSUP LLP

1 Michael C. Lieb (SBN 126831)  
mlieb@ecjlaw.com  
2 Kenneth P. Hsu (SBN 306326)  
khsu@ecjlaw.com  
3 ERVIN COHEN & JESSUP LLP  
9401 Wilshire Boulevard, Ninth Floor  
4 Beverly Hills, California 90212-2974  
Telephone: (310) 273-6333  
5 Facsimile: (310) 859-2325

6 Attorneys for Plaintiff  
SHE BEVERAGE COMPANY, INC.

**FILED**  
Superior Court of California  
County of Los Angeles  
**AUG 19 2019**  
Sherri K. Carter, Executive Officer/Clerk  
By \_\_\_\_\_, Deputy  
Jennifer De Luna

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
10 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

12 SHE BEVERAGE COMPANY, INC.,  
a California corporation,  
13  
Plaintiff,  
14  
v.  
15 ANTHONY TODD (TONY) FARMER,  
an individual; HYDRO BRAND INC., a  
16 California corporation; LEGENDS IPTV  
LLC, a California limited liability corporation;  
17 CHYANNE JACOMINI, an individual;  
18 LEGENDS BASKETBALL LEAGUE, LLC,  
a California limited liability company; and  
19 DOES 2 -100, inclusive,  
20 Defendants.

Case No. 19STCV2624  
~~PROPOSED~~ **ORDER RE: PLAINTIFF  
SHE BEVERAGE COMPANY, INC.'S  
EX PARTE APPLICATION FOR  
TEMPORARY RESTRAINING ORDER  
AND ORDER TO SHOW CAUSE RE:  
PRELIMINARY INJUNCTION**  
  
DATE: August 19, 2019  
TIME: 8:30 a.m.  
DEPT: 85  
  
Action Filed: July 30, 2019

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**PROPOSED ORDER**

The *Ex Parte* Application (the "Application") of Plaintiff SHE Beverage Company, Inc. ("SHE") for the issuance of a Temporary Restraining Order ("TRO") and application for Order to Show Cause ("OSC") Re: Preliminary Injunction as to Defendants Anthony Todd (Tony) Farmer ("Farmer"), Hydro Brand, Inc. ("Hydro Brand"), Legends IPTV LC ("Legends"), Legends Basketball League ("LBL") and Chyanne Jacomini ("Jacomini") (collectively, the "Defendants"), came on for a hearing on August 19, 2019 at 8:30 a.m. in Department 85 of the above entitled Court, located at 111 North Hill Street, Los Angeles, California, 90012. SHE appeared by and through its counsel, Michael C. Lieb. Other appearances were as noted in the Court's record.

Upon the reading of the Application and the pleadings filed in this action, and having heard the argument of counsel and the parties, it appears to the Court that good cause exists for the issuance of a TRO and OSC Re: Preliminary Injunction.

THEREFORE, IT IS HEREBY ORDERED AS FOLLOWS:

I.

**ORDER TO SHOW CAUSE RE: PRELIMINARY INJUNCTION;**

**SERVICE AND BRIEFING SCHEDULE**

9/10 1:30 pm

IT IS HEREBY ORDERED that Defendants shall appear on August \_\_, 2019, at 8:30 a.m. in Department 85 of the above entitled Court, located at 111 North Hill Street, Los Angeles, California, 90012, to show cause, if they have any, why the Court should not issue a Preliminary Injunction enjoining and restraining Defendants, including their members, agents, officers, attorneys, servants, employees, contractors, and representatives, in addition to any non-natural persons they control, from doing any of the following, whether directly or indirectly:

- 1. Soliciting, requesting, or causing any individuals or entities to purchase shares of SHE stock or otherwise invest in SHE;
- 2. Disposing of, concealing, transferring, encumbering, dissipating, or distributing any funds received from individuals or entities that paid those funds for purpose of purchasing shares of SHE stock, including without limitation, the following investments received from:
  - (a) Deborah Di Benedetto: \$8,000.00

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- (b) Richard Figueroa: \$20,000.00
- (c) Denae Di Benedetto: \$5,000.00
- (d) Mike Fenimore: \$5,000.00
- (e) John Sparks: \$25,000.00
- (f) Crista Jacomini: \$30,000.00
- (g) Larry Jacomini: \$25,000.00
- (h) Steve White: \$25,000.00
- (i) Timothy Miller: \$30,000.00
- (j) Bertie Plante: \$5,000.00
- (k) Matt Tenczar: \$40,000.00
- (l) Gene and Penny Tenczar: \$15,000.00
- (m) Alisha Morcate: \$20,000.00

3. Issuing, transferring, or distributing any shares of Hydro Brand stock to individuals or entities that executed agreements to purchase shares of SHE stock with Legends Basketball League or any other entity affiliated with defendants;

4. Attempting in any manner to coerce, intimidate, bribe, or otherwise tamper with any SHE investor and any potential witness in this action, including by making false and defamatory statements about SHE or by stating or implying that a witness's cooperation in this matter will constitute a breach of any contract to which the witness is a party; and

5. Taking any action to access any password-protected information of SHE, including by attempting to hack or log into any SHE database of information.

A copy of this OSC must be served on Defendants via email by August 19, 2019, and a proof of service of the OSC must be delivered to the Court by August 21, 2019. Any response to the OSC shall be filed and served by August 23, 2019; and any reply papers shall be filed and served by August 25, 2019. The below-referenced TRO shall expire on August 25, 2019 unless extended by subsequent order of this Court.

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II.

TEMPORARY RESTRAINING ORDER

IT IS HEREBY ORDERED that, pending the hearing on the Court’s OSC Re: Preliminary Injunction, Defendants, including their members, agents, officers, attorneys, servants, employees, contractors, and representatives, in addition to any non-natural persons they control, shall be restrained and enjoined from doing any of the following, whether directly or indirectly:

1. Soliciting, requesting, or causing any individuals or entities to purchase shares of SHE stock or otherwise invest in SHE;

2. Disposing of, concealing, transferring, encumbering, dissipating, or distributing any funds received from individuals or entities that paid those funds for purpose of purchasing shares of SHE stock, including without limitation, the following investments received from:

- (a) Deborah Di Benedetto: \$8,000.00
- (b) Richard Figueroa: \$20,000.00
- (c) Denae Di Benedetto: \$5,000.00
- (d) Mike Fenimore: \$5,000.00
- (e) John Sparks: \$25,000.00
- (f) Crista Jacomini: \$30,000.00
- (g) Larry Jacomini: \$25,000.00
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- (k) Matt Tenczar: \$40,000.00
- (l) Gene and Penny Tenczar: \$15,000.00
- (m) Alisha Morcate: \$20,000.00

3. Issuing, transferring, or distributing any shares of Hydro Brand stock to individuals or entities that executed agreements to purchase shares of SHE stock with Legends Basketball League or any other entity affiliated with defendants;

4. Attempting in any manner to coerce, intimidate, bribe, or otherwise tamper with

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any SHE investor and any potential witness in this action, including by making false and defamatory statements about SHE or by stating or implying that a witness's cooperation in this matter will constitute a breach of any contract to which the witness is a party; and

5. Taking any action to access any password-protected information of SHE, including by attempting to hack or log into any SHE database of information.

Dated: August 19, 2019

  
HON. JAMES C. CHALFANT,  
JUDGE OF THE SUPERIOR COURT