PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. My business address is [redacted]

I am over the age of 18 and not a party to the within action.

On December 8, 2016, I served the foregoing document described as PETITIONER'S INCOME AND EXPENSE DECLARATION on the interested parties in this action.

[ ] by enclosing them in a sealed envelope addressed as stated on the attached mailing list.

[X] by placing [ ] the original [X] a true copy thereof enclosed in a sealed envelope addressed as follows:

Robert Brandt
Feinberg, Mindel, Brandt & Klein, LLP
[redacted]

[X] (BY PERSONAL SERVICE) I caused such envelope(s) to be delivered by hand to the Office(s) of the addressee(s) noted above on said date.

[X] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Dated: December 8, 2016, at Los Angeles, California.

SHELA JACKSON

BUTTER, BUZARD, FISHBEIN & ROYCE LLP
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
[redacted]

BUTER, BUZARD, FISHBEIN & ROYCE LLP
Gary Fishbein, State Bar No. 93765
[redacted]
Attorneys for Petitioner, MARY JANE BLIGE

FILED
Superior Court of California
County of Los Angeles
DEC 08 2016
Sherri R. Carter, Executive Officer/Clerk
By _____, Deputy
Michael Rodriguez

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

In re the Marriage of

Petitioner: MARY JANE BLIGE

and

Respondent: MARTIN ISAACS

CASE NO. BD 643753

Hon. Robert Broadbelt
Department 81

REQUEST TO PRESENT ORAL TESTIMONY AT REQUEST FOR ORDER

DATE: December 21, 2016
TIME: 8:30 a.m.
DEPT: 81

Pursuant to Family Code Section 217(c) and California Rule of Court 3.1306(b), Petitioner hereby requests permission to present the oral testimony of the following individuals at the time of the Request For Order set for December 21, 2016:

1. Michael T. Miskei, CPA, who will testify as to cash flow available for support and support calculations. His direct testimony is expected to take 45 minutes.

2. Respondent, Martin Isaacs, who will testify as to income, job efforts, payment of expenses and cash flow. His direct testimony is expected to take 45 minutes.

BUTER, BUZARD, FISHBEIN & ROYCE LLP

DATED: December 7, 2016

By: _____
GARY FISHBEIN
Attorney for Petitioner, Mary Jane Blige

BUTER, BUZARD, FISHBEIN & ROYCE LLP
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
[redacted]

PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. My business address is [redacted]

I am over the age of 18 and not a party to the within action.

On December 8, 2016, I served the foregoing document described as REQUEST TO PRESENT ORAL TESTIMONY AT REQUEST FOR ORDER on the interested parties in this action.

[ ] by enclosing them in a sealed envelope addressed as stated on the attached mailing list.

[X] by placing [ ] the original [X] a true copy thereof enclosed in a sealed envelope addressed as follows:

Robert Brandt
Feinberg, Mindel, Brandt & Klein, LLP
[redacted]

[X] (BY PERSONAL SERVICE) I caused such envelope(s) to be delivered by hand to the Office(s) of the addressee(s) noted above on said date.

[X] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Dated: December 8, 2016, at Los Angeles, California.

SHELA JACKSON

BUTER, BUZARD, FISHBEIN & ROYCE LLP
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
[redacted]

FL-320

PARTY WITHOUT ATTORNEY OR ATTORNEY: STATE BAR NO.:
NAME: GARY FISHBEIN SBN 93765
FIRM NAME: BUTER, BUZARD, FISHBEIN & ROYCE LLP
STREET ADDRESS: [redacted]
CITY: Los Angeles, CA 90049-650 STATE: ZIP CODE:
TELEPHONE NO.: [redacted]
E-MAIL ADDRESS: [redacted]
ATTORNEY FOR (name): Petitioner, Mary Jane Blige

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles
STREET ADDRESS: 111 North Hill Street
MAILING ADDRESS: Same
CITY AND ZIP CODE: Los Angeles, CA 90012
BRANCH NAME: Central District

PETITIONER: MARY JANE BLIGE
RESPONDENT: MARTIN ISAACS
OTHER PARENT/PARTY:

FOR COURT USE ONLY

FILED
Superior Court of California
County of Los Angeles
DEC 08 2016
Sherri R. Carter, Executive Officer/Clerk
By _____, Deputy
Michael Rodriguez

RESPONSIVE DECLARATION TO REQUEST FOR ORDER

CASE NUMBER: BD 643753

HEARING DATE: 12/21/2016 TIME: 8:30 a.m. DEPARTMENT OR ROOM: 81

Read *Information Sheet: Responsive Declaration to Request for Order* (form FL-320-INFO) for more information about this form.

1. ☐ RESTRAINING ORDER INFORMATION
   a. ☐ No domestic violence restraining/protective orders are now in effect between the parties in this case.
   b. ☐ I agree that one or more domestic violence restraining/ protective orders are now in effect between the parties in this case.

2. ☐ CHILD CUSTODY
   ☐ VISITATION (PARENTING TIME)
   a. ☐ I consent to the order requested for child custody (legal and physical custody)
   b. ☐ I consent to the order requested for visitation (parenting time).
   c. ☐ I do not consent to the order requested for ☐ child custody ☐ visitation (parenting time)
      ☐ but I consent to the following order:

3. ☐ CHILD SUPPORT
   a. I have completed and filed a current *Income and Expense Declaration* (form FL-150) or, if eligible, a current *Financial Statement (Simplified)* (form FL-155) to support my responsive declaration.
   b. ☐ I consent to the order requested.
   c. ☐ I consent to guideline support.
   d. ☐ I do not consent to the order requested ☐ but I consent to the following order:

4. ☒ SPOUSAL OR DOMESTIC PARTNER SUPPORT
   a. I have completed and filed a current *Income and Expense Declaration* (form FL-150) to support my responsive declaration.
   b. ☐ I consent to the order requested.
   c. ☒ I do not consent to the order requested ☒ but I consent to the following order:
      Reasonable according to proof

FL-320

PETITIONER: MARY JANE BLIGE RESPONDENT: MARTIN ISAACS OTHER PARENT/PARTY:	CASE NUMBER: BD 643753

5. ☐ PROPERTY CONTROL
   a. ☐ I consent to the order requested.
   b. ☐ I do not consent to the order requested ☐ but I consent to the following order:

6. ☑ ATTORNEY'S FEES AND COSTS
   a. I have completed and filed a current *Income and Expense Declaration* (form FL-150) to support my responsive declaration.
   b. I have completed and filed with this form a *Supporting Declaration for Attorney's Fees and Costs Attachment* (form FL-158) or a declaration that addresses the factors covered in that form.
   c. ☐ I consent to the order requested.
   d. ☑ I do not consent to the order requested ☑ but I consent to the following order:
   Respondent to bear his own fees and costs.

7. ☐ DOMESTIC VIOLENCE ORDER
   a. ☐ I consent to the order requested.
   b. ☐ I do not consent to the order requested ☐ but I consent to the following order:

8. ☑ OTHER ORDERS REQUESTED
   a. ☐ I consent to the order requested.
   b. ☐ I do not consent to the order requested ☑ but I consent to the following order:
   Respondent to forthwith return the Range Rover automobile to the dealer or appropriate agency and to pay any fees due in connection with the return of the vehicle.

9. ☐ TIME FOR SERVICE / TIME UNTIL HEARING
   a. ☐ I consent to the order requested.
   b. ☐ I do not consent to the order requested ☐ but I consent to the following order:

10. ☑ FACTS TO SUPPORT my responsive declaration are listed below. The facts that I write and attach to this form cannot be longer than 10 pages, unless the court gives me permission. ☐ Attachment 10.
    See attached declarations of Mary Jane Blige, Michael Miskei, CPA, and Gary Fishbein, and Memorandum of Points and Authorities.

I declare under penalty of perjury under the laws of the State of California that the information provided in this form and all attachments is true and correct.

Date:

Mary Jane Blige ▶ SEE FACSIMILE SIGNATURE ON ATTACHED PAGE

(TYPE OR PRINT NAME) (SIGNATURE OF DECLARANT)

PETITIONER: MARY JANE BLIGE RESPONDENT: MARTIN ISAACS OTHER PARENT/PARTY:	CASE NUMBER: BD 643753

5. ☐ PROPERTY CONTROL
   a. ☐ I consent to the order requested.
   b. ☐ I do not consent to the order requested ☐ but I consent to the following order:

6. ☑ ATTORNEY'S FEES AND COSTS
   a. I have completed and filed a current *Income and Expense Declaration* (form FL-150) to support my responsive declaration.
   b. I have completed and filed with this form a *Supporting Declaration for Attorney's Fees and Costs Attachment* (form FL-158) or a declaration that addresses the factors covered in that form.
   c. ☐ I consent to the order requested.
   d. ☑ I do not consent to the order requested ☑ but I consent to the following order:
   Respondent to bear his own fees and costs.

7. ☐ DOMESTIC VIOLENCE ORDER
   a. ☐ I consent to the order requested.
   b. ☐ I do not consent to the order requested ☐ but I consent to the following order:

8. ☑ OTHER ORDERS REQUESTED
   a. ☐ I consent to the order requested.
   b. ☐ I do not consent to the order requested ☑ but I consent to the following order:
   Respondent to forthwith return the Range Rover automobile to the dealer or appropriate agency and to pay any fees due in connection with the return of the vehicle.

9. ☐ TIME FOR SERVICE / TIME UNTIL HEARING
   a. ☐ I consent to the order requested.
   b. ☐ I do not consent to the order requested ☐ but I consent to the following order:

10. ☑ FACTS TO SUPPORT my responsive declaration are listed below. The facts that I write and attach to this form cannot be longer than 10 pages, unless the court gives me permission. ☐ Attachment 10.
    See attached declarations of Mary Jane Blige, Michael Miskei, CPA, and Gary Fishbein, and Memorandum of Points and Authorities.

I declare under penalty of perjury under the laws of the State of California that the information provided in this form and all attachments is true and correct.

Date: 12-7-16

Mary Jane Blige
(TYPE OR PRINT NAME)

(SIGNATURE OF DECLARANT)

Essential Forms

LLP
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
BUTER, BUZARD, FISHBEIN & ROYCE

DECLARATION OF MARY JANE BLIGE

I, MARY JANE BLIGE, declare as follows:

I am the Petitioner in the above-entitled action. I know the following of my own knowledge and could testify competently thereto if called upon as a witness to do so. I make this Declaration in opposition to Respondent's request for spousal support and attorneys fees.

1. While I understand that this hearing is not for the purpose of determining the validity of our prenuptial agreement, it is important for me to refute various allegations which the Respondent makes in his declaration regarding the agreement. While the Respondent did not have an attorney representing him, he voluntarily elected not to do so. Attached hereto, and marked **Exhibit A**, and incorporated herein by this reference, is a letter signed by Respondent at the time of execution of the prenuptial agreement. Clearly, while Respondent could have obtained counsel he elected not to do so. Moreover, I made full disclosure of my estate and Respondent had no estate to speak of. The prenuptial agreement provides for a waiver of spousal support.

2. I do not and have not acknowledged that Respondent is entitled to spousal support. The stipulation that Respondent attaches as his Exhibit 1, was entered into before I recalled and discovered that we did indeed have a prenuptial agreement. I discovered the agreement a few days after I signed Exhibit 1. We immediately advised Respondent's counsel and then promptly filed a motion to bifurcate to determine the validity of the agreement. A trial date to determine the validity of the agreement is not yet set, however, at the urging of Judge Lewis, a trial setting conference is scheduled for April, 2017.

3. In addition to the $50,000 reflected in Respondent's Exhibit 1, I have also advanced an additional $60,000 to Respondent between August and October of this year. I also advanced $25,000 to Respondent's attorney. Moreover, within approximately the last few weeks, the Respondent has been paid an additional $195,000 for his 10 percent commission in connection with his involvement in assisting with arranging various tour dates for the tour in which I am presently engaged. Accordingly, in some 4 months, the