



- 9. The defendants acted in reckless disregard of its truth or falsity.
- 10. The defendants engaged in a reckless lack of investigation.
- 11. The defendants acted with malice for the sole purpose of selling magazines.
- 12. Brown has not spoken or communicated with Handspike in over one (1) year.
- 13. Brown and Whitney Houston were not planning a wedding weeks before her death.
- 14. All the statements below are false statements that appeared in the National Enquirer article on March 26, 2012 that are false.

15. In particular, the statements below are the most egregious and false:

"They were planning a small wedding, probably in Las Vegas with just the two of them and their daughter Krissi. Bobby told me, 'The world may have thought we were history, but the reality is we were never really apart. We've never stopped loving each other.' **FALSE**

"After his dad's funeral in Boston in December he flew to Atlanta. For the next week Bobby holed up at Whitney's home, where they rekindled their romance and their intimate relationship. They slept together in Whitney's bedroom and talked about what kind of wedding they'd have." **FALSE**

Bobby is also said to have told Derrick that he believes he could have prevented his former spouse's untimely death. **FALSE**

He added: "Bobby told me 'I could have saved her! If I had been with Whitney, she never would have died in that hotel bathtub. I would never have left her alone.'" **FALSE- Handspike and Brown have not communicated in well over one year.**

Although Bobby is thought to be engaged to Alicia Etheredge, mother of his two-year-old son Cassius, Derrick claims the pair split last November because of his love for Whitney.... **FALSE**

He said: "While Bobby takes parental responsibility for Cassius, and remains friends with her, Alicia realized Whitney was the love of Bobby's life. It was almost as if Bobby was still with Whitney and Alicia was the other woman." **FALSE**

- 16. In regards to Bobby Brown, on several occasions on the past eighteen months, the National Enquirer has called Brown's representatives to fact check stories they intended to run. For example, Patricia Best ("Best") with the National Enquirer with a phone

number of 310-256-0787, has contacted Brown’s management in regards to a story published in the National Enquirer about Brown’s daughter.

17. In regards to the story that was published on March 26, 2012, Best nor any other individual at the National Enquirer contacted Brown to fact check the grossly erroneous story that Brown was going to remarry Whitney Houston, were engaged in sexual relationship with Whitney Houston, was cheating on his fiancée with Whitney Houston or communicated any such information to Handspike. The National Enquirer and Handspike knew or should have known that story and inform from Handspike was false as the National Enquirer reported on October 12, 2010 that Brown was engaged to marry Alicia Etheredge. See <http://www.nationalenquirer.com/celebrity/whitney-drug-intervention> Exhibit “B”. The facts of the National Enquirer story of October 12, 2010 and the allegations of Handspike surely indicate that the facts could and should have been additionally researched and fact checked.

18. In March of 2012, February 2012, Brown and his fiancé were beginning the planning there wedding and Houston was in a dating relationship with another individual. The entire article that was published on March 26, 2012 was false. Brown and Etheredge married in June 2012.

**COUNT I  
DEFAMATION OF CHARACTER-LIBEL  
AGAINST ALL DEFENDANTS**

19. Plaintiffs repeats and realleges each of the preceding paragraphs 1-18.

20. The defendants have published derogatory comments about the Plaintiff which accused the Plaintiff of sexual impropriety with Whitney Houston and cheating on his fiancée.

21. The actions of the Defendants have damaged the reputation of the Plaintiffs.

22. The actions of the Defendants were designed to capitalize on the death of Whitney Houston and use Brown and Etheredge to sell magazines.

23. The actions of the defendants were done with malice and disregard for the truth.

24. The defendants engaged in reckless fact investigation.

25. Upon information and belief, the Enquirer earned millions of dollars from the false information printed about Brown and Etheredge.

26. The defendants actions have damaged the Plaintiffs.

**COUNT II**  
**DEFAMATION OF CHARACTER-SLANDER**  
**AGAINST ALL DEFENDANTS**

- 27. Plaintiffs repeats and realleges each of the preceding paragraphs 1-26.
- 28. The defendants have published and stated derogatory comments about the Plaintiff which accused the Plaintiff of sexual impropriety with Whitney Houston and cheating on his fiancée.
- 29. The actions of the Defendants have damaged the reputation of the Plaintiffs.
- 30. The actions of the Defendants were designed to capitalize on the death of Whitney Houston and use Brown and Etheredge to sell magazines.
- 31. The actions of the defendants were done with malice and disregard for the truth.
- 32. The defendants engaged in reckless fact investigation.
- 33. Upon information and belief, the Enquirer earned millions of dollars from the false information printed about Brown and Etheredge.
- 34. The defendants actions have damaged the Plaintiffs.

**WHEREFORE,**

The Plaintiffs demand,

- 1. Judgment on all counts;
- 2. An injunction ordering the Defendants to cease the use and circulation of the article;
- 3. An award in excess of One Million Dollars (\$1,000,000.00);
- 4. An accounting of all monies received by Defendants from the circulation of the false story;
- 5. All legal fees; and,
- 6. Any other relief this Court deems just and equitable.

**PLAINTIFFS' DEMAND TRIAL BY JURY**

ALICIA ETHEREDGE-BROWN AND  
ROBERT BROWN  
By their Attorneys,



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March 20, 2013

# EXHIBIT A



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## WORLD EXCLUSIVE! BOBBY BROWN: THE TRUTH ABOUT WHITNEY

[A+ A](#)

Published on: March 26, 2012  
by RICK EGUSQUIZA, NATIONAL ENQUIRER  
Photography by: Getty Images Entertainment



**LATEST! BOBBY BROWN arrested for DUI in Los Angeles.** Bobby was pulled over by cops for talking on a cellphone and then failed 4 sobriety tests. He is a Van Nuys jail. Bond has not yet been set. Updated: 2:17 PM PDT

**Before her tragic death, WHITNEY HOUSTON was set to stun the world by walking down the aisle once again with her badboy ex-hubby BOBBY BROWN, The ENQUIRER has learned.**

The stormy couple vowed to re-wed after a week of torrid sex at Whitney's Atlanta home, but her family blew up at the news, and their rage triggered the final booze and drug binge that claimed the superstar singer's life.



“Bobby told me, ‘Whitney and me are getting married again,’ ” his close friend **Derrick Handspike** told The ENQUIRER in a world exclusive interview.

“They were planning a small wedding, probably in Las Vegas with just the two of them and their daughter Krissi.

“Bobby told me, ‘The world may have thought we were history, but the reality is we were never really apart. We’ve never stopped loving each other.’ ”

And Derrick says Bobby – whose turbulent 14-year marriage to Whitney ended in 2007 – told him: “I could have saved her! If I had been with Whitney, she never would have died in that hotel bathtub. I would have never left her alone!”

Before she passed, Whitney had been involved in a casual relationship with 31-year-old hip-hop singer **Ray J**. But Derrick claims any real romance between them was over.

“Their relationship had turned into more of a friendship,” said Derrick, a 41-year-old entertainment executive who’s known former “New Edition” singer Bobby since 1991 and authored his biography.

“Bobby knew Whitney was still in love with him. Even Ray J knew nothing could break Bobby and Whitney’s tight bond.”

According to Derrick, the passing of Bobby’s father Herbert – who lost his battle with cancer at age 82 on Dec. 10, 2011 – sparked Whitney and Bobby’s hush-hush reconciliation.

“Bobby lost both his parents last year, and he was at his lowest emotional point,” said Derrick. “After his dad’s funeral in Boston, he flew to Atlanta. Whitney and Krissi picked him up at the airport.”

For the next week, Bobby, 43, holed up at Whitney’s home, where they rekindled their romance and their intimate relationship, said Derrick.

“Bobby and Whitney went to some of their favorite restaurants, reminisced about the good old days, and watched TV,” said Derrick.

“They slept together in Whitney’s bedroom, and talked about what kind of wedding they’d have. Bobby told me, ‘That week was the happiest I’ve been. Whitney and I got that old feeling back, and we were a family again.’ ”

Bobby shared the couple’s dramatic decision to re-wed with their daughter Krissi during dinner at a Beverly Hills restaurant on Feb. 1. Whitney dined with them, then left Krissi with her father. It was the last time Bobby saw her alive.



“Nobody in the Houston family, especially **Cissy**, wanted to see Whitney and Bobby back together. But if Whitney wanted to get back with Bobby, no one, not even her mother, would stop her.”

The family meltdown caused Whitney to flip out, according to a source.

“Whitney’s erratic behavior returned, and she went on a booze and pill bender in the days leading up to her death,” the source revealed.

Bobby told Derrick: “I could have saved her,” adding that because of her past history with dangerous drugs he would have been by her side while she was bathing.

“She would not have died in that bathtub,” Bobby told his best pal and biographer.

With Whitney gone, all Bobby wants is happiness for their only child Krissi. But he’s afraid Whitney’s family will brainwash Krissi against him.

“They’ve always blamed Bobby for introducing Whitney to cocaine, but it actually was the other way around,” said Derrick.

# EXHIBIT B



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## WHITNEY DRUG INTERVENTION

[A+ A](#)

Published on: October 12, 2010



**WHITNEY HOUSTON's ex BOBBY BROWN** blames himself for her raging out of control [drug problems!](#)

And he's recruiting her loved ones to stage an intervention, sources tell The ENQUIRER.

Friends believe Whitney is still hopelessly addicted to hard drugs, and Bobby is making plans to ask pop diva **Janet Jackson** - whose beloved brother Michael battled his own substance-abuse demons - to step in, insiders say.

"Whitney is struggling with her addictions, and Bobby blames himself for her problems," a close family friend divulged to The ENQUIRER.

"They did drugs together for years, but Bobby got clean and now he sees it as his job to help Whitney beat her addictions.

"He told me, 'What's happening to Whitney is all my fault. I stayed in the party life too long. I should have helped her a long time ago.'"

Bobby is now sober after beating alcohol and drugs - and it was the couple's 17-year-old daughter **Bobbi Kristina** who begged him to help her troubled mom, according to the source.

"Bobbi Kristina told her dad that she thinks Whitney is still getting high, and asked him to confront Whitney about it," the source revealed.

"Bobby went to Whitney and said, 'Look, baby, you can't get this monkey off your back alone. I will help you.' He promised that they'd beat her addictions together."

Whitney, 47, has admitted to getting involved with drugs after she married Bobby in 1992. In a lengthy interview with **Oprah Winfrey** last year, Whitney finally broke down and disclosed the couple did marijuana and freebase cocaine.

"We were lacing our marijuana with base," Whitney confessed.

While denying the couple was on crack, she admitted they were spending wildly on cocaine.

"We were buying kilos and ounces, and ounces. We would have our stash," Whitney said.

Now a desperate Bobby - who's engaged to his manager **Alicia Etheredge** - is enlisting the help of Whitney's friends and family members, said the source.

He's in the process of talking to her mother **Cissy**, her music guru **Clive Davis**, cousin **Dionne Warwick**, and actor **Denzel Washington**, who once helped the troubled star break free of her drug use, said the source.

"Bobby knows that most of these people, especially Whitney's mom Cissy, don't like him and blame him for Whitney getting hooked on drugs, but he's hoping they'll put those feelings aside to help Whitney," said the source.

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