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4 SCOTT DOUGLAS ORA, IN PRO PER

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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES**

10
11 SCOTT DOUGLAS ORA, individually, and in)
his derivative capacity as trustee of the Leo Robin)
12 Trust, on behalf of the Leo Robin Trust)

13 Plaintiff,

14 v.

15 HOLLYWOOD CHAMBER OF COMMERCE,)
16 HOLLYWOOD CHAMBER'S BOARD OF)
DIRECTORS, HOLLYWOOD WALK OF)
17 FAME, WALK OF FAME COMMITTEE; and)
DOES 1 through 100 Inclusive,)

18 Defendants.

CASE NO.:

PLAINTIFF SCOTT ORA'S
VERIFIED COMPLAINT FOR
BREACH OF CONTRACT,
NEGLIGENCE AND PERMANENT
INJUNCTIVE RELIEF TO INSTALL
THE STAR ON THE HOLLYWOOD
WALK OF FAME AWARDED TO
LYRICIST LEO ROBIN MORE THAN
31 YEARS AGO

JURY TRIAL DEMANDED

Action Filed: June 29, 2021

21 **COPYRIGHT NOTICE**

22 **Copyright © 2021 Scott Douglas Ora. All Rights Reserved. Copyright claimed**
23 **in the contents of the entire pleading, exclusive of the text from statutes,**
24 **regulations, case law, correspondence and websites of the Hollywood Chamber**
25 **of Commerce and Hollywood Walk of Fame, articles (including photographs)**
26 **by the Los Angeles Times and Variety, and any excerpts quoted therefrom**
27 **within this pleading.**

1 NOTICE IS HEREBY GIVEN Plaintiff Scott Douglas Ora ("Plaintiff" or "Ora"), hereby
2 brings this civil action in his individual capacity against the Hollywood Chamber of Commerce,
3 Hollywood Chamber's Board Of Directors, Hollywood Walk of Fame, Walk of Fame Committee
4 (collectively, "Defendants" or "Hollywood Chamber") and in his derivative capacity under
5 California Probate Code § 16010 as trustee of the Leo Robin Trust, on behalf of the Leo Robin
6 Trust, against the Hollywood Chamber; and Does 1-100, inclusive, for breach of contract,
7 negligence and permanent injunctive relief to install the star on the Hollywood Walk of Fame
8 awarded to lyricist Leo Robin more than 31 years ago. Plaintiff alleges upon personal knowledge
9 and belief as to his own acts, and upon information and belief as to all other matters, which
10 allegations have substantial evidentiary support in 25 Exhibits in this Verified Complaint and
11 alleges as follows:

11 I. THE PARTIES

12 1. Plaintiff Ora is and has been, at all times mentioned herein, an individual residing in
13 the County of Los Angeles, California.

14 2. Leo Robin Trust, which has title and interest in and to all copyrights in songs written
15 by Leo Robin from all sources, place of business is considered where the place of where Ora, in his
16 derivative capacity as sole trustee of the Leo Robin Trust, on behalf of the Leo Robin Trust, resides,
17 which is the County of Los Angeles.

18 3. Plaintiff Ora also brings this action as the current and acting trustee for the Leo
19 Robin Trust pursuant to California Probate Code § 16010, which provides the trustee has a duty to
20 take reasonable steps to bring and enforce claims that are part of the Leo Robin Trust.

21 4. Defendant Hollywood Chamber is and has been, at all relevant times mentioned
22 herein, a 501c6 organization, a nonprofit organized and operated to promote the common business
23 interest of its members and not to engage in regular business activities, with employer identification
24 number 95-0838840. Hollywood Chamber's principal place of business is located at 7018
25 Hollywood Blvd., Hollywood, California 90028 and office is located at 6255 Sunset Blvd. Ste 150,
26 Hollywood, California 90028.

27 5. Defendant Hollywood Chamber's Board of Directors is and has been, at all
28 relevant times mentioned herein, the controlling body and official Board of Hollywood Chamber,
subject to the jurisdiction of California state courts as the Board of a California organization.

1 sports entertainers (as of 2022) and others. The Walk of Fame is administered by the Hollywood
2 Chamber and maintained by the self-financing Hollywood Historic Trust.¹

3 13. The Walk of Fame Selection Committee (aka "Walk of Fame Committee") receives
4 an average of two hundred nomination applications a year. The criteria for receiving a star
5 consists of the following: professional achievement, longevity in the category of five years or
6 more, contributions to the community and the guarantee that the celebrity will attend the
7 dedication ceremony if selected. Posthumous awards require a five-year waiting period and a
8 relative of deceased recipients must attend posthumous presentations. At an annual meeting each
9 June, the Walk of Fame Committee selects approximately 20 to 24 (recently, approximately 30)
10 celebrities to receive stars on the Walk of Fame. One (sometimes more but few) posthumous award
11 is given each year as well.¹

12 14. After the Walk of Fame Committee has made its selections, the Hollywood
13 Chamber's Board of Directors also votes to approve the star and then for a final approval, the
14 names are submitted to the City of Los Angeles' Board of Public Works Department. All
15 honorees must be approved by the Hollywood Chamber, the decisions of which are final and
16 entirely within the Hollywood Chamber's discretion.¹

17 15. The cost of a star is \$50,000 (as of 2020), payable at time right after selection and
18 collected to pay for the creation and installation of the star as well as general maintenance of the
19 Walk of Fame. Back in the year 1990, the cost was \$4,000.¹

20 16. The recipient has up to two years to schedule their ceremony. If the ceremony is not
21 done within the two-year period, it will expire and an application must be resubmitted. Back in
22 1990, the recipient has up to five years to schedule their ceremony and, if the ceremony is not
23 scheduled within five years, a new application must be submitted.¹

24 17. Four score and fourteen years ago tomorrow, on June 30, 1927, Leo Robin ("Robin")
25 became a member of the American Society of Authors and Publishers ("ASCAP") on his journey to
26 become one of the most influential songwriters of the 20th Century. A true and correct copy of the
27 certificate that shows Robin elected to membership in ASCAP on June 30, 1927 is attached hereto
28 as Exhibit 23. Robin stumbled onto his songwriting career by accident. After graduation, he worked
as a publicity agent, a newspaper reporter and even as a social worker. Robin would find his way
out of the steel-mill towns of Pittsburgh in 1926 to a one-room flat in Greenwich Village to lead the

¹ The source of this information on the background of the Walk of Fame and their nomination process with various rules and terms is collected from its website at walkoffame.com.

1 bohemian life and to chase his ambitions to become an actor or a playwright. A starving actor has to
2 eat so he started to write lyrics on Broadway shows to buy food. Before he had a chance behind the
3 footlights, he had won fame as a lyric writer. Then in 1928, he was sent to a small bungalow on the
4 back lot of Paramount in Hollywood when this town was looking for a hit-maker at the dawning of
5 the age of sound. In Tinseltown he wrote songs for 30 years in the middle of the night for films,
6 timeless songs that would eventually transcend their original form and become favorites around the
7 world.²

8 18. *Variety*, the premier source of entertainment news, released on September 30, 2019
9 the feature news story, *Thanks for the Memory: How Leo Robin Helped Usher In the Golden Age of*
10 *Song in Film*, by pop culture critic Roy Trakin. The piece opens up with the legacy more than 90
11 years later about the legendary songwriter Robin, "The centerpiece of Scott Ora's cluttered San
12 Fernando Valley apartment is the 1939 Oscar his step-grandfather, the late lyricist Leo Robin, was
13 presented for co-writing "Thanks for the Memory." Sung by Bob Hope and Shirley Ross in the film
14 "The Big Broadcast of 1938," the trophy sits proudly on the piano where Robin worked on some of
15 his biggest hits. The movie marked the comedian's breakout role and Leo's tune, co-written with
16 frequent collaborator Ralph Rainger, soon became Hope's theme song..." A true and correct copy of
17 this news story, "Thanks for the Memory: How Leo Robin Helped Usher In the Golden Age of Song
18 in Film," by Roy Trakin from *Variety* on September 30, 2019 is attached hereto as Exhibit 12.

19 19. Roy Trakin continues his story with the many Robin songs adopted by the most
20 celebrated Hollywood stars as their theme or signature tunes, "Over the course of 20 years, from
21 1934 (when the best original song category was introduced and he was nominated for "Love in
22 Bloom") through 1954, Robin, a member of the Songwriters Hall of Fame who died in 1984 at the
23 age of 84, earned 10 Oscar nominations (two in 1949 alone). His impressive catalog includes
24 signature tunes for Maurice Chevalier ("Louise"), Jeanette McDonald ("Beyond the Blue
25 Horizon"), Bing Crosby ("Please," "Zing a Little Zong"), Dorothy Lamour ("Moonlight and
26 Shadows"), Jack Benny ("Love in Bloom"), Eddie Fisher ("One Hour With You"), Carmen
27 Miranda ("Lady in the Tutti Frutti Hat") and Marilyn Monroe ("Diamonds Are a Girl's Best
28 Friend"). His songs have been covered by Bing Crosby and Elvis Presley ("Blue Hawaii"), Perry
Como, James Brown and Billy Eckstine ("Prisoner of Love") as well as Frank Sinatra ("For Every

² The source of this information on the background of Robin and a complete biography of him can be found on the official website of Leo Robin at leorobin.com.

1 Man There's a Woman," "Thanks for the Memory"). "My Ideal," originally sung by Maurice
2 Chevalier in the 1930 film, "Playboy of Paris," is now a jazz standard with interpretations by
3 Margaret Whiting, Chet Baker, Thelonious Monk, Coleman Hawkins, Art Tatum, Dinah
4 Washington, Sarah Vaughn and Tony Bennett, while "Easy Living" because (sic) a regular in the
5 sets of Billie Holiday and Ella Fitzgerald." A true and correct copy of this news story, "Thanks for
6 the Memory: How Leo Robin Helped Usher In the Golden Age of Song in Film," by Roy Trakin
7 from *Variety* on September 30, 2019 is attached hereto as Exhibit 12.

8 20. It was a fortuitous search on the internet on July 6, 2017 that led Ora to something
9 about his grandfather, the songwriter Robin, that neither his family nor he knew anything about that
10 happened more than 27 years ago³ -- Leo was awarded a posthumous star on the Walk of Fame in
11 1990. Stunned, he called the Hollywood Walk of Fame and they said it was true and he learned
12 that in 1988 both his grandmother, Cherie Robin, and actor Bob Hope sponsored Leo for a star but,
13 sadly, his grandmother passed away more than one year before the letter from the Walk of Fame
14 announcing this award was sent out and Bob Hope was never notified; they informed him nothing
15 like this had ever happened before where a letter was left unanswered and the star was never placed
16 on the Hollywood Walk of Fame, but, unfortunately, now in his attempt to see that Robin gets his
17 star, they have turned a deaf ear. A true and correct copy about this discovery of Robin's star on the
18 official website of Robin is attached hereto as Exhibit 1.

19 21. Throughout the past sixty years, the Hollywood Chamber has successfully kept track
20 of 2,696 honorees and has seen to it that each and every one of them received a star, which was then
21 successfully installed on the Walk of Fame -- except for Robin. One would think that today's Walk
22 of Fame would respect the decisions made by those who served before them. At this point, one can't
23 help but conclude that Robin, his sponsors, Cherie Robin and Bob Hope, Ora, Leo Robin Trust and
24 the 1990 Walk of Fame Committee, itself, have been treated unjustly by the Hollywood Chamber.
25 It's now time for the Hollywood Chamber to honor its obligation to install the star that was
26 awarded to Robin more than 31 years ago and put Robin's star in its rightful place on the Walk of
27 Fame. Here's what happened for the first time in the history of the Walk of Fame where a star
28 was awarded to an honoree who followed all the rules but not installed.

³ As of the date of the discovery of Robin's star on July 6, 2017, Robin was awarded a posthumous star on the Walk of Fame in 1990 which happened more than 27 years ago; as of today, Robin was awarded a star more than 31 years ago.

1 **IV. STATEMENT OF FACTS**

2 **A. Chronicle of events over the past four years since the discovery of Robin's Star**
3 **2017**

4 22. On July 6, 2017, Ora made his discovery of Robin's star on the Walk of Fame
5 ("Robin's ★")⁴ and reported it on the official website of Robin, "I found myself gazing at Lincoln
6 Center's Jazz Academy webpage where the newly released announcement of the 2017 inductees to
7 the Ertugan Hall of Fame caught my eye. I was already familiar with two of the three winners, Don
8 Redman and McCoy Tyner, both of whom had recorded some of Leo's songs; however, I was not
9 familiar with the third winner." A true and correct copy about this discovery of Robin's ★ on the
10 official website of Robin is attached hereto as Exhibit 1.

11 23. Ora continues with where his search led him, "I wanted to learn more about the third
12 inductee, Tito Puente, so I began to search for him online along with Leo's name and was directed
13 to page 311 of Tito Puente: When the Drums Are Dreaming, a biography, by Josephine Powell. It
14 was here the book noted that Tito Puente was awarded a star on the Hollywood Walk of Fame in
15 1990, and then went on to say Leo Robin was awarded a posthumous star that same year. I was
16 stunned and went back to reread the paragraph a number of times. How could my family and I never
17 have known this about my grandfather? And to think that it happened 27 years ago! I was in
18 disbelief!" A true and correct copy about this discovery of Robin's ★ on the official website of
19 Robin is attached hereto as Exhibit 1.

20 24. Ora continues with his investigation after his discovery of Robin's ★, "The only
21 thing I could think of was to call the Hollywood Walk of Fame. When I spoke to Ana Martinez
22 there, I told her what I had just discovered and asked if it could possibly be true. She put me on hold
23 a few minutes while she checked her records. When she returned, she confirmed it was true and said
24 'Nothing like this has ever happened before.'" A true and correct copy about this discovery of
25 Robin's ★ on the official website of Robin is attached hereto as Exhibit 1.

26 25. On July 6, 2017, after Ora spoke with Ms. Martinez, Ora got the impression she was
27 going to help him. He followed her instructions and drafted a letter addressed to the Walk of Fame
28 Committee, explaining what had happened and requesting that Leo's 1990 posthumous star be

26 ⁴ Hereafter, "Robin's ★" is abbreviated version for "Robin's star on the Walk of Fame" and other
27 versions of the star name such as the nicknames "Leo's long-lost star" or "Leo's lost star," which are
28 commonly used in places such as the official website of Robin, social media and press releases, and
are cited and appear in accompanying Exhibits.

1 placed on the Walk of Fame. He also got official documents from Hillside Memorial Park to verify
2 the date of his grandmother's demise, proving she was no longer living when the acceptance letter
3 was mailed to her.⁵ A true and correct copy of a letter on July 11, 2017 from Ora to the Walk of
4 Fame Committee and sent via email to Ms. Martinez confirming this discussion about Robin's ⚡ is
attached hereto as Exhibit 2.

5 26. On July 11, 2017, Ora emailed Ms. Martinez, VP Media Relations and Producer of
6 the Walk of Fame, as she'd requested, the letter to forward to the Walk of Fame Committee along
7 with the official documents. Ora also recited their conversation regarding the background of how
8 Robin was awarded the star, "I also appreciate your providing me with the background of how Leo
9 was awarded this star including how your records show that in 1988 both my grandmother, Cherie
10 Robin, and actor, Bob Hope, sponsored Leo for a star on the Walk of Fame and how on June 18,
11 1990 the Committee sent a letter to the same address that was used on Mrs. Robin's original
12 application, notifying her of the award. Tragically, she did not live long enough to receive this letter
13 and to learn that all of her efforts to get Leo a star on the Walk of Fame were successful because
14 Mrs. Robin passed away on May 28, 1989, almost exactly one year before the letter was sent out.
15 Unfortunately, no one else in my family was aware of the nomination, let alone the award. You
16 explained to me that the (Walk of Fame) Committee had never experienced a situation like this
17 before." A true and correct copy of this letter on July 11, 2017 from Ora to the Walk of Fame
Committee and sent via email to Ms. Martinez regarding Robin's ⚡ is attached hereto as Exhibit 2.

18 27. The letter from Ora to the Walk of Fame Committee on July 11, 2017 was
19 accompanied by documentation of Mrs. Robin's passing in which Ora said, "I am forwarding to you
20 separately an email that Hillside Memorial Park sent to me that provides the documentation of Mrs.
21 Robin's passing...." A true and correct copy of this letter on July 11, 2017 from Ora to the Walk of
22 Fame Committee and sent via email to Ms. Martinez regarding Robin's ⚡ is attached hereto as
23 Exhibit 2.
24

25 ⁵ Following Ora's discovery of Robin's ⚡ on July 6, 2017, a sequence of events took place
26 immediately in the space of about two hours: Ora looked up and called the Walk of Fame to
27 confirm his finding; then he called Hillside Memorial Park to inquire when his grandmother passed
28 away; next he received an email from Hillside Memorial Park with the information about his
grandmother; then he called the Walk of Fame to give Ms. Martinez the date of his grandmother's
passing and he discussed the next step with her which was to write a letter to the Walk of Fame
Committee.

1 28. Ora got official documents from Hillside Memorial Park on July 6, 2017 to verify the
2 date of his grandmother's demise, proving she was no longer living when the acceptance letter was
3 mailed to her and he forwarded this email on July 11, 2017 to Ms. Martinez saying, "Here, as
4 promised, are the official records from Hillside Memorial Park that verify the passing of my
5 grandmother." A true and correct copy of these emails between Ora and Hillside Memorial Park on
6 July 6, 2017 and between Ora and Ms. Martinez on July 11, 2017 regarding the documentation of
7 Mrs. Robin's passing are attached hereto as Exhibit 19.

8 29. After speaking with Ms. Martinez and learning that Robin's ⚡ existed, Ora was
9 optimistic and thought that the careless mistake made by the Walk of Fame would quickly be
10 corrected. Soon, however, he learned how wrong he was. Days turned into weeks that, in turn,
11 turned into months. It became clear to him that the matter for now, anyway, was out of his hands.
12 He kept a log of his correspondence with the Hollywood Chamber including telephone calls, emails
13 and letters, recording only the bare facts. A true and correct copy of emails between Ora and Ms.
14 Martinez from July 11, 2017 through December 31, 2017 with his follow-up with her regarding
15 Robin's ⚡ are attached hereto as Exhibit 3.

16 30. Whenever Ora checked his inbox, there was nothing from Ms. Martinez. August
17 came and went. He wished her a happy Labor Day and asked if she had any news for him yet about
18 Robin's ⚡. No answer. He wished her Happy Holidays and asked if she'd had a chance to speak
19 with the Walk of Fame Committee about his grandfather. Still nothing. By the time New Year's
20 rolled around with no word, he was beside himself with frustration. A true and correct copy of
21 emails between Ora and Ms. Martinez from July 11, 2017 through December 31, 2017 with his
22 follow-up with her regarding Robin's ⚡ are attached hereto as Exhibit 3.

23 **2018**

24 31. On May 16, 2018, Ora called the Hollywood Walk of Fame and asked to speak with
25 Ana Martinez but was told she was unavailable. He asked the intern with whom he was speaking if
26 he could leave a message for her and also if he could send a string of unanswered emails from him
27 dating back to July 11, 2017 to show Ana Martinez. She said she'd be happy to do so. A true and
28 correct copy of the email between Ora and the intern on May 16, 2018 regarding Robin's ⚡ is
attached hereto as Exhibit 21.

 32. On July 10, 2018, never having heard back, Ora emailed Ana Martinez again, "Dear
Ms. Martinez, With the passage of the Fourth of July...and the beginning of summer, I am following

1 up...regarding the posthumous star that was awarded in 1990 to my grandfather, the songwriter, Leo
2 Robin...Best wishes," A true and correct copy of these emails between Ora and Ms. Martinez on
3 July 10, 2018 regarding Robin's ⚡ are attached hereto as Exhibit 3.

4 33. On July 10, 2018, that same day, almost exactly one year since Ora had last heard
5 from Ms. Martinez, he received the following email, "Hi Scott, I resent (sic) this to my boss. I don't
6 know that it will happen as it has to be sponsored and you said you didn't want to have a ceremony
7 or the fanfare that comes with the event which is why we do this. Let's see what he says." Ora was
8 confused. He never said he didn't want to have a ceremony. A true and correct copy of these emails
9 between Ora and Ms. Martinez on July 10, 2018 regarding Robin's ⚡ are attached hereto as Exhibit
10 3.

11 34. On July 12, 2018, Ora reassured Ms. Martinez in a letter sent via email saying, "I
12 look forward to proudly attending the ceremony to celebrate my grandfather's star with my family
13 including my brother, many nieces and nephews and extended family...We would love to be given
14 the opportunity for the Hollywood, Broadway and jazz communities to come together along with
15 the scores of fans of Leo's music to celebrate this joyous occasion." A true and correct copy of this
16 letter dated July 11, 2018 from Ora to the Walk of Fame Committee and sent via email on July 12,
17 2018 to Ms. Martinez regarding Robin's ⚡, specifically the ceremony, is attached hereto as Exhibit
18 4.

19 35. On July 17, 2018, Ms. Martinez sent Ora an email where she stipulated, "From what
20 I gather you are now willing to have the star dedication happen with a ceremony?? There is the
21 sponsorship fee involved of 40,000.00. Please let me know when you would like to do the ceremony
22 and once you give me a date we can move forward. I do have to get it re-instated by the Chair.
23 Please let me know if you do want to move forward. Thanks, Ana 'Handling the stars for many
24 moons!' Producer, Hollywood Walk of Fame, Vice President of Media Relations, Hollywood
25 Chamber of Commerce." A true and correct copy of these emails between Ora and Ms. Martinez on
26 July 17, 2018 in regard to moving forward with arrangements for Robin's ⚡ are attached hereto as
27 Exhibit 3.

28 36. On July 19, 2018, in an overnight envelope, Ora sent Ms. Martinez the date he
selected in 2019 for Leo's star ceremony, April 6th, his birthday, along with a check for \$4,000, the
fee that his grandmother and Bob Hope, the co-sponsors, had agreed to pay when they first filled
out the application back in 1988. A true and correct copy of this letter dated July 19, 2018 from Ora

1 to the Walk of Fame Committee sent c/o Ms. Martinez regarding specified arrangements for Robin's
2 ★ is attached hereto as Exhibit 5.

3 37. On July 23, 2018, Ms. Martinez sent Ora's letter to her back to him along with the
4 check he'd made payable to the Hollywood Historic Trust for \$4,000 and wrote, "Dear Mr. Ora, I
5 received your check for \$4,000 which [I] am sending back to you. The approval of Mr. Robins star
6 lapsed many years ago. It would need to be reinstated by the Walk of Fame Committee, which will
7 next meet in June 2019. It is very likely the committee would require that the fee be raised to the
8 current approved level. I am happy to present this to the committee for their consideration, but we
9 are unable to accept or hold the check which you have sent. The application is at
10 www.walkoffame.com. Sincerely, Ana Martinez, Vice President, Media Relations" A true and
11 correct copy of this letter dated July 23, 2018 from Ms. Martinez to Ora accompanied by Ora's letter
12 to her which she returned back to him along with the check he'd made payable to the Hollywood
13 Historic Trust for Robin's ★ is attached hereto as Exhibit 6.

14 38. On July 30, 2018, Ora sent Ms. Martinez a letter to set the record straight via email
15 saying, "I was taken aback by [your] letter and...[your] decision to return the check" and went on to
16 say, "To think that, after all of this, you would ask me to wait yet another year to have the
17 Committee consider reinstating the star to Leo at their next meeting in June 2019 is beyond the
18 pale." A true and correct copy of this letter dated July 30, 2018 from Ora to the Walk of Fame
19 Committee and sent via email to Ms. Martinez in which Ora expressed profound disquietness with
20 the response from Ms. Martinez on behalf of the Walk of Fame Committee regarding Robin's ★ is
21 attached hereto as Exhibit 7.

22 39. On July 30, 2018, that same day, Ms. Martinez reconsidered, "It shouldn't be a
23 problem to reinstate but the fee is \$40,000. Prices have gone up. We can discuss further when Leron
24 gets back from his vacation in mid-August." A true and correct copy of these emails between Ora
25 and Ms. Martinez on July 30, 2018 regarding Ms. Martinez reconsideration of Robin's ★ are
26 attached hereto as Exhibit 3.

27 40. On September 5, 2018, Labor Day had passed and Ora had heard nothing. He
28 emailed Ana Martinez again, "Dear Ms. Martinez, When we last communicated on July 31st, you
suggested that we could further discuss Leo's star when Leron Gubler returned from his vacation in
mid-August. Now that August has come and gone and Labor Day is over, please let me know how
we can proceed. Best wishes," A true and correct copy of these emails between Ora and Ms.
Martinez on September 5, 2018 regarding Robin's ★ are attached hereto as Exhibit 3.

1 41. On September 5, 2018, 19 minutes later, Leron Gubler burst in, "I'm responding to
2 your latest inquiry to Ana Martinez, our Walk of Fame Producer. Ana has briefed me on your
3 request to reinstate the approval of a star for Leo Robin. As Ana has explained to you, we have
4 existing protocols that must be followed to reinstate star approval. The earliest this can be done is at
5 next year's Walk of Fame Committee meeting in June 2019. I understand that you are requesting
6 the fee to be reduced to \$4,000, which was the fee that was in place back in 1990, when Mr. Robin
7 was first approved. Unfortunately, that is not possible. The committee will never approve the
8 reinstatement unless there is a sponsorship in place to pay the fee at the current rate. There would be
9 no purpose in our bringing this to the committee without that commitment. The application deadline
10 for consideration by the committee is May 31, 2019, so you still have plenty of time to work on
11 finding a sponsor. Please stay in touch with Ana, and advise her when you are able to find a
12 sponsor. Then we would be happy to present it to the committee again. Best regards, Leron Gubler,
13 President & CEO, Hollywood Chamber of Commerce" A true and correct copy of these contentious
14 emails between Ora, Leron Gubler and Ms. Martinez on September 5, 2018 regarding Robin's ⚡ are
15 attached hereto as Exhibit 3.

16 42. Ora had made several attempts to reach Ms. Donelle Dadigan, the Chair of the Board
17 of the Hollywood Chamber, for assistance to resolve this matter. Ora sent letters via FedEx or his
18 personal assistant on September 18, 2018, October 1, 2018 and November 7, 2018 to Ms. Donelle
19 Dadigan, which he has proof of deliveries, for help to resolve this matter but she never responded.
20 A true and correct copy of these letters from Ora to Ms. Donelle Dadigan, the Chair of the Board of
21 the Hollywood Chamber, for assistance to resolve this matter regarding Robin's ⚡ are attached
22 hereto as Exhibit 8.

23 **2019**

24 43. On May 23, 2019, Ashley Lee from the *Los Angeles Times* ("*LA Times*") first breaks
25 news on the giant newspaper's website about the grandson's serendipitous discovery on July 6, 2017
26 of Robin's ⚡ in her investigated story, *Leo Robin never got his Walk of Fame star. Now his
27 grandson is fighting for it.* Ms. Lee reported, "Ora grew up knowing that his grandfather was also
28 one of the greats. What he didn't know is that years later he'd be tangled in a still-unresolved back-
and-forth with the Walk of Fame to get it set in stone." A true and correct copy of this news
story, *Leo Robin never got his Walk of Fame star. Now his grandson is fighting for it*, by Ashley
Lee from the *LA Times* on May 23, 2019 is attached hereto as Exhibit 9.

1 44. On May 26, 2019, in the Sunday print edition of the *LA Times*, a similar story by
2 Ashley Lee was released about the grandson's discovery of Robin's ⚡ on July 6, 2017 in her news
3 story, *A Walk of Fame star still in limbo: The late lyricist behind Bob Hope's theme song was a*
4 *victim of bad timing, but 'Memory' still irks kin*. Ms. Ashley Lee posed this question to the
5 Chamber, "It's been decades since Robin was named to the Walk of Fame...what would it take to get
6 the star installed? Martinez explained that Robin would need to be reinstated by the current
7 committee at the next annual meeting. She didn't anticipate problems with that part of the process."
8 This was all, apparently, an insincere PR stunt being that the grandson never heard a word from the
9 Hollywood Chamber since the meeting took place in June 2019. A true and correct copy of this
10 news story, *A Walk of Fame star still in limbo: The late lyricist behind Bob Hope's theme song was*
11 *a victim of bad timing, but 'Memory' still irks kin*, by Ashley Lee from the *LA Times* on May 26,
12 2019 is attached hereto as Exhibit 10.

11 45. On June 26, 2019, after crossing 29 years since Robin was awarded a star on the
12 Walk of Fame, *Leo Robin Music*⁶ issued its first release, in a series of press releases. Following the
13 annual meeting where the Walk of Fame Committee selected celebrities to receive stars on the Walk
14 of Fame, an announcement was made on June 20, 2019 of the new honorees by actress/singer
15 Vanessa Williams, a Walk of Fame Committee member, via live stream exclusively by *Variety* on
16 walkoffame.com. Soon after on June 26th, *Leo Robin Music* issued the press release, *Leo Robin*
17 *Music is Indignant over the Hollywood Walk of Fame's Decision to not Install Leo's Long-Lost Star*
18 *("#LeosLostStar") Awarded to the "Thanks for the Memory" Oscar-Winning Lyricist 29 Years Ago*,
19 with this statement, "In the wake of the release of this story by the *LA Times*, *Leo Robin Music* is
20 outraged to learn what happened 29 years ago. Ms. Lee reported, "The envelope was returned to its
21 sender and has since remained in the Chamber of Commerce's records" and also tweeted, "at first I
22 didn't believe that *Leo Robin's* star had really slipped through the cracks" with a photo of that
23 acceptance letter and the envelope stamped "RETURN TO SENDER."⁷ Ms. Lee explained the
24 Chamber's view, "A mistake it was not, noted (Ana) Martinez [Producer of the Walk Of Fame] to
25 The Times. Back in 1989, before the ease of email and cell phones, honorees were not as repeatedly

25 ⁶ *Leo Robin Music* and *Leo Robin Media* are companies which handle public and media relations,
26 and promote the music and legacy of Robin.

27 ⁷ The most significant, among many revelations unknown to Ora before the release of the *LA Times*
28 investigated story on May 23, 2019, was the *LA Times* story where Ms. Lee reported, "The envelope
was returned to its sender and has since remained in the Chamber of Commerce's records" and also
tweeted at that time, "at first I didn't believe that *Leo Robin's* star had really slipped through the
cracks" with a photo of that acceptance letter and the envelope stamped "RETURN TO SENDER."

1 and actively pursued to secure their star as they are today. That means no follow-up letters and no
2 calls to co-signers, even if Robin's application was co-signed by (Bob) Hope, who has four stars on
3 the Walk." A true and correct copy of this press release, *Leo Robin Music is Indignant over the*
4 *Hollywood Walk of Fame's Decision to not Install Leo's Long-Lost Star ("#LeosLostStar") Awarded*
5 *to the "Thanks for the Memory" Oscar-Winning Lyricist 29 Years Ago*, issued by *Leo Robin Music*
6 on June 26, 2019 is attached hereto as Exhibit 11.

6 46. On September 30, 2019, *Variety*⁸ released the news story, "Thanks for the Memory:
7 How Leo Robin Helped Usher In the Golden Age of Song in Film," by Roy Trakin on its popular
8 entertainment news website *Variety.com*. This article refrained from discussing Robin's 
9 controversy but instead covered Robin's lasting legacy. Mr. Trakin, who received an MFA in Film
10 from Columbia where he studied under legendary film critic Andrew Sarris, reported, among many
11 of Robin's achievements, "And his legacy just happens to define the modern sound era of motion
12 pictures." A true and correct copy of this news story, "Thanks for the Memory: How Leo Robin
13 Helped Usher In the Golden Age of Song in Film," by Roy Trakin from *Variety* on September 30,
14 2019 is attached hereto as Exhibit 12.

15 **2020**

16 47. On June 23, 2020, after crossing 30 years since Robin was awarded a star on the
17 Walk of Fame, *Leo Robin Music* issued a press release. Following the annual meeting where the
18 Walk of Fame Committee selected celebrities to receive stars on the Walk of Fame, an
19 announcement was made on June 18, 2020 of the new honorees by radio personality Ellen K, Chair
20 of the Walk of Fame Committee, via the Walk of Fame Facebook page. Soon after on June 23rd,
21 *Leo Robin Music* issued the press release, *Leo Robin Music is Outraged over the Hollywood Walk of*
22 *Fame's Decision to Not Install Leo's Long-Lost Star ("#LeosLostStar") Awarded to the "Thanks for*
23 *the Memory" Oscar-Winning Lyricist 30 Years Ago*, with this statement, "Leo Robin Music is
24 outraged over the Hollywood Walk of Fame's decision at their annual meeting and subsequent
25 announcement last week to once again deny the installation of the star that was awarded to lyricist,
26 Leo Robin, 30 years ago." A true and correct copy of this press release, *Leo Robin Music is*
27 *Outraged over the Hollywood Walk of Fame's Decision to Not Install Leo's Long-Lost Star*

28 ⁸ *Variety* has a partnership with the Hollywood Chamber and is a media partner with the Walk of Fame.

1 (*"#LeosLostStar"*) Awarded to the *"Thanks for the Memory"* Oscar-Winning Lyricist 30 Years Ago,
2 issued by *Leo Robin Music* on June 23, 2020 is attached hereto as Exhibit 13.

3 48. On July 14, 2020, *Leo Robin Music* issued an open letter press release to a member
4 of the Walk of Fame Committee about Robin's 🌟,⁹ which headlined, *Leo Robin Music's Open*
5 *Letter to Ellen K. Re: Moral Wrong for Failure to Install "#Leosloststar" Awarded to the "Thanks*
6 *For The Memory" Oscar-Winning Lyricist 30 Years Ago*. The release said, "Ellen K., I urge you, as
7 the chair, to find the moral compass that guides the Hollywood Chamber and the Walk of Fame
8 Committee and set a new course. Right now, in contradiction to its mission, the Hollywood
9 Chamber is not doing justice to the award to Robin. Instead we are witness to the moral injustice of
10 Leo's long-lost star and the Hollywood Chamber's refusal to honor their commitment to Robin's
11 memory. I want to reaffirm my deepest level of commitment to achieving that all of you - the
12 Hollywood Chamber and the Walk of Fame Committee - uphold the strictest moral authority in
13 fulfilling your commitment. This is your moral imperative." A true and correct copy of this press
14 release, *Leo Robin Music's Open Letter to Ellen K. Re: Moral Wrong for Failure to Install*
"#Leosloststar" Awarded to the "Thanks For The Memory" Oscar-Winning Lyricist 30 Years Ago,
15 issued by *Leo Robin Music* on July 14, 2020 is attached hereto as Exhibit 14.

16 49. On August 11, 2020, *Leo Robin Music* issued a second open letter press release, as a
17 follow-up, to the same member of the Walk of Fame Committee about Robin's 🌟, which headlined,
18 *Leo Robin Music's Second Open Letter to Ellen K. Re: Moral Wrong for Failure to Install the Star,*
19 *("#Leosloststar"), Awarded to the "Thanks For The Memory" Oscar-Winning Lyricist More Than*
20 *30 Years Ago*. The content was similar to the first open letter press release issued on July 14, 2020.
21 A true and correct copy of this press release, *Leo Robin Music's Second Open Letter to Ellen K. Re:*
22 *Moral Wrong for Failure to Install the Star, ("#Leosloststar"), Awarded to the "Thanks For The*
Memory" Oscar-Winning Lyricist More Than 30 Years Ago, issued by *Leo Robin Music* on August
23 11, 2020 is attached hereto as Exhibit 14.

24 50. On August 17, 2020, Ora wrote a thank you letter to Ellen K for responding in a
25 phone call to him on August 11, 2020 to the open letter press release he wrote to her earlier that
26 day. Ora learned from Ellen K that she was never consulted on Robin's 🌟 and in his letter to her

26 ⁹ *Leo Robin Music* reached out to members of the Walk of Fame Committee through open letter
27 press releases including to Ellen K, Vanessa Williams, LL Cool J, Kristin Chenoweth and Elvis
28 Duran and Ora sent a personal courtesy copy of each open letter via FedEx to each of these
individuals which they received the morning of the published open letter; only Ellen K responded
and she did so with genuine empathy and easy grace.

1 said, "On July 6, 2017, after I spoke with Ana Martinez, I followed her instructions and drafted a
2 letter addressed to the Walk of Fame Committee, explaining what had happened and requesting that
3 Leo's 1990 posthumous star be placed on the Hollywood Walk of Fame. On July 11, 2017, I
4 emailed Ms. Martinez, as she'd requested, the letter to forward to the Committee, of which you
5 were a member at the time, along with official documents. Based on our conversation, I understand
6 you never received a copy of the letter I sent to the Committee so I am now providing you a copy of
7 this correspondence."¹⁰ A true and correct copy of this letter dated August 17, 2020 from Ora to
8 Ellen K and sent via text on the same day to her regarding Robin's  is attached hereto as Exhibit
9 15.

10 **2021**

11 51. On June 18, 2021, Ora sent a Demand Letter to Rana Ghadban, President and CEO
12 of the Hollywood Chamber, for the Hollywood Chamber to finally honor its obligation to install the
13 star of Leo Robin that was awarded more than 31 years ago by the 1990 Walk of Fame Committee
14 with a traditional ceremony to accompany the unveiling of the star along with all other customary
15 practices that take place with the award of a star. There has been no response by Rana Ghadban, as
16 of today, to the Demand Letter. A true and correct copy of this Demand Letter sent by Ora on June
17 18, 2021 to Rana Ghadban, President and CEO of the Hollywood Chamber, is attached hereto as
18 Exhibit 25.

19 52. On June 22, 2021, after crossing 31 years since Robin was awarded a star on the
20 Walk of Fame, *Leo Robin Music* issued a press release. Following the annual meeting where the
21 Walk of Fame Committee selected celebrities to receive stars on the Walk of Fame, an
22 announcement was made on June 17, 2021 of the new honorees by radio personality Ellen K, Chair
23 of the Walk of Fame Committee, via the Walk of Fame Facebook page and
24 www.walkoffame.com. Soon after on June 22nd, *Leo Robin Music* issued the press release, *The*
25 *Hollywood Chamber Makes Annual Announcement of the Honorees from the Hollywood Walk of*
26 *Fame Class of 2022: For The Star Awarded to the "Thanks For The Memory" Lyricist 31 Years Ago*
But Never Installed, This Ritual is Known as "Pass Over," with this statement, "While Leo Robin
27 Music congratulates these performers for the honors, we are woefully reminded of the fact that the

27 ¹⁰ In Ora's letter to the Walk of Fame Committee on July 11, 2017, with details provided in
28 allegation no. 26 along with a copy attached hereto as Exhibit 2, he requested, "In light of these
bizarre circumstances, I, as Leo's grandson and trustee of *Leo Robin Music*, humbly request that the
Walk of Fame Committee reinstate the award to Leo of the posthumous star."

1 star awarded to Leo Robin in 1990 was never installed. The Hollywood Chamber as well as the
2 Walk of Fame Committee continue to be morally adrift in regard to this unprecedented situation
3 with the star awarded to Leo Robin but not installed." A true and correct copy of this press release,
4 *The Hollywood Chamber Makes Annual Announcement of the Honorees from the Hollywood Walk*
5 *of Fame Class of 2022: For The Star Awarded to the "Thanks For The Memory" Lyricist 31 Years*
6 *Ago But Never Installed, This Ritual is Known as "Pass Over,"* issued by *Leo Robin Music* on June
7 22, 2021 is attached hereto as Exhibit 16.

8 **B. Chronicle of events more than 30 years ago regarding the award of Robin's** ☹

9 53. On December 29, 1984, Robin passed away. At the time on July 6, 2017 when Ora
10 got the official records from Hillside Memorial Park that verify the passing of his grandmother,
11 Hillside Memorial Park also provided documentation on Robin's date of death ("DOD"), "Leo
12 Robin: DOB: 4/6/1895 DOD: 12/29/1984." A true and correct copy of these emails between Ora
13 and Hillside Memorial Park on July 6, 2017 and between Ora and Ms. Martinez on July 11, 2017
14 regarding the documentation of Mrs. Robin's passing wherein there is documentation of Leo
15 Robin's DOD is attached hereto as Exhibit 19. This is further corroborated by a tribute by the Los
16 Angeles City Council a few days after his passing where "All members stood in tribute and
17 reverence as the council adjourned its meeting of January 2, 1985." A true and correct copy of the
18 certificate of Los Angeles City Council paying respect where "All members stood in tribute and
19 reverence as the council adjourned its meeting of January 2, 1985" is attached hereto as Exhibit 24.

20 54. In 1988, Robin's wife, Cherie Robin, and actor Bob Hope sponsored Leo for a
21 posthumous star on the Hollywood Walk of Fame. This is verified in Ora's letter on July 11, 2017 to
22 the Walk of Fame Committee saying, "I also appreciate your providing me with the background of
23 how Leo was awarded this star including how your records show that in 1988 both my grandmother,
24 Cherie Robin, and actor, Bob Hope, sponsored Leo for a star on the Walk of Fame and how on June
25 18, 1990 the Committee sent a letter to the same address that was used on Mrs. Robin's original
26 application, notifying her of the award." A true and correct copy of this letter on July 11, 2017 from
27 Ora to the Walk of Fame Committee and sent via email to Ms. Martinez regarding Robin's ☹ is
28 attached hereto as Exhibit 2.

55. The application submitted by the sponsors is further corroborated by the story issued
on May 23, 2019 by Ashley Lee from the *LA Times* in her investigated story, *Leo Robin never got*
his Walk of Fame star. Now his grandson is fighting for it, wherein there is a photograph of the

1 application contents with the caption, "Materials from the original 1988 application for Leo Robin's
2 posthumous star, sent by his wife." A true and correct copy of this photograph of the application
3 materials, along with the caption, shot by J. Chun of the *LA Times* is attached hereto as Exhibit 17.

4 56. This application, known as the Hollywood Walk of Fame Nomination,¹¹ has all the
5 specified terms of a bona fide offer which include these two most significant ones: "1. It is
6 understood that the cost of installing a star in the Walk of Fame upon approval is \$40,000** and the
7 sponsor of the nominee accepts the responsibility for arranging for payment to the Hollywood
8 Historic Trust, a 501(c)3 charitable foundation. 2. It is further understood that, should the above-
9 named nominee be chosen for placement in the Walk of Fame, said nominee guarantees to be
10 present at the dedication ceremonies on a date and time mutually agreed upon with the Walk of
11 Fame Committee. An induction ceremony must be scheduled within two years of June selection
12 date, or the nomination must be re-submitted." Back in the year 1990, the cost was \$4,000 (Verified
13 in allegation no. 15) and the recipient has up to five years to schedule their ceremony (Verified in
14 allegation no. 16). A true and correct copy of the Hollywood Walk of Fame Nomination for 2019
15 Selection is attached hereto as Exhibit 18.

16 57. On May 28, 1989, Cherie Robin passed away. This is verified in Ora's letter on July
17 11, 2017 to the Walk of Fame Committee saying, "Tragically, she did not live long enough to
18 receive this letter and to learn that all of her efforts to get Leo a star on the Walk of Fame were
19 successful because Mrs. Robin passed away on May 28, 1989, almost exactly one year before the
20 letter was sent out. Unfortunately, no one else in my family was aware of the nomination, let alone
21 the award. You explained to me that the (Walk of Fame) Committee had never experienced a
22 situation like this before." A true and correct copy of this letter on July 11, 2017 from Ora to the
23 Walk of Fame Committee and sent via email to Ms. Martinez regarding Robin's  is attached
24 hereto as Exhibit 2.

25 58. In this letter to the Walk of Fame Committee on July 11, 2017, Ora also said this
26 about Mrs. Robin's passing, "I am forwarding to you separately an email that Hillside Memorial
27 Park sent to me that provides the documentation of Mrs. Robin's passing...." A true and correct
28

¹¹ The Hollywood Walk of Fame Nomination for 2019 Selection, which is attached as Exhibit 18, has virtually the same terms as they were back in 1990 when Robin was awarded a star except as noted earlier in allegation no. 15, "The cost of a star is \$50,000 (as of 2020)...Back in the year 1990, the cost was \$4,000" and in allegation no. 16, "The recipient has up to two years to schedule their ceremony.... Back in 1990, the recipient has up to five years to schedule their ceremony."

1 copy of this letter on July 11, 2017 from Ora to the Walk of Fame Committee and sent via email to
2 Ms. Martinez regarding Robin's ⚡ is attached hereto as Exhibit 2.

3 59. Ora got official documents from Hillside Memorial Park to verify the date of his
4 grandmother's demise, proving she was no longer living when the acceptance letter was mailed to
5 her and he forwarded this email on July 11, 2017 to Ms. Martinez saying, "Here, as promised, are
6 the official records from Hillside Memorial Park that verify the passing of my grandmother" which
7 has documentation on Cherie Robin's DOD, "Cherie Robin (I do not see her with the surname:
8 Redmond): DOB: 7/4/1910 DOD: 5/28/1989." A true and correct copy of these emails between Ora
9 and Hillside Memorial Park on July 6, 2017 and between Ora and Ms. Martinez on July 11, 2017
regarding the documentation of Mrs. Robin's passing are attached hereto as Exhibit 19.

10 60. On June 18, 1990, an acceptance letter signed by Johnny Grant, Chairman of the
11 1990 Walk of Fame Committee, was sent to Mrs. Robin. This is verified in Ora's letter on July 11,
12 2017 to the Walk of Fame committee saying, "I also appreciate your providing me with the
13 background of how Leo was awarded this star including...how on June 18, 1990 the Committee sent
14 a letter to the same address that was used on Mrs. Robin's original application, notifying her of the
15 award." A true and correct copy of this letter on July 11, 2017 from Ora to the Walk of Fame
Committee and sent via email to Ms. Martinez regarding Robin's ⚡ is attached hereto as Exhibit 2.

16 61. Mrs. Robin never received the letter because she passed way before it was sent on
17 May 28, 1989. In her news story on May 23, 2019 regarding Robin's ⚡, Ashley Lee from the *LA*
18 *Times* reported what happened to the acceptance letter, "The envelope was returned to its sender and
19 has since remained in the Chamber of Commerce's records." A true and correct copy of this news
20 story, *Leo Robin never got his Walk of Fame star. Now his grandson is fighting for it*, by Ashley
Lee from the *LA Times* on May 23, 2019 is attached hereto as Exhibit 9.

21 62. Ms. Lee on May 23, 2019 also tweeted, "at first I didn't believe that Leo Robin's star
22 had really slipped through the cracks" with a photo (shot by J. Chun of the *LA Times*) of that
23 acceptance letter and the envelope stamped "RETURN TO SENDER." A true and correct copy of
24 the photograph (shot by J. Chun of the *LA Times*) of the acceptance letter and the envelope stamped
"RETURN TO SENDER" is attached hereto as Exhibit 20.

25 63. On July 27, 2003, Bob Hope passed away. All the news outlets covered the passing
26 of Bob Hope including NBC News and CBS News with the headline, *Bob Hope Thanks for the*
27 *Memories*, to give ode to his theme song written by Robin. These tributes make it clear that Bob
28 Hope was alive till July 27, 2003 and active until the mid 1990s including a television special. The

1 Hollywood Chamber could have simply notified the sponsor, Bob Hope, regarding the acceptance
2 letter with the news Robin was awarded a star on the Walk of Fame. A true and correct copy of
3 news stories by NBC news and CBS News on July 28, 2003 to pay tribute to Bob Hope are attached
4 hereto as Exhibit 22.

5 **C. Ora's Mission In Pursuit of Justice for the Hollywood Chamber to Honor Its**
6 **Obligation to Install Robin's ☼**

7 64. When it appeared as if things were finally moving forward with arrangements for
8 Robin's ☼, in a letter Ora sent to the Walk of Fame Committee on July 19, 2018, not knowing the
9 bitter journey would continue, he said, "I can't help but feel that this award is a bittersweet moment
10 for the family of Leo Robin. It reminds me of the bittersweet duet that Leo wrote, "Thanks for the
11 Memory," sung by Bob Hope and Shirley Ross in *The Big Broadcast of 1938* where they play a
12 divorced couple reminiscing about their time together. It's unfortunate that the original sponsors --
13 my grandmother and Bob Hope -- are not here today to accept the honors and that generations of
14 Leo's family who were here when the award was offered are no longer around -- my dear parents
15 and Leo's wonderful four sisters and brother, all who adored him. This leaves the younger
16 generations of Leo's family to attend -- his grandchildren and many nieces and nephews -- all who
17 adored and idolized him." As previously explained, Ora's hopes were dashed when the Hollywood
18 Chamber reneged and the family has since lost more family members, including two nephews, who
19 will never see Robin's ☼. A true and correct copy of this letter dated July 19, 2018 from Ora to the
20 Walk of Fame Committee sent c/o Ms. Martinez regarding finally moving forward with
21 arrangements for Robin's ☼ is attached hereto as Exhibit 5.

22 65. On September 9, 1990, Wendy Lynn Ora, his younger sister, passed away soon after,
23 just shy of three months, the acceptance letter was sent out on June 18, 1990 from the Hollywood
24 Chamber to Mrs. Robin. At the time on July 6, 2017 when Ora got the official records from Hillside
25 Memorial Park that verify the passing of his grandmother, Hillside Memorial Park also provided
26 documentation on Wendy Ora's DOD, "Wendy Ora: DOB: 2/16/1961 DOD: 9/9/1990." Ora carries
27 the torch of his grandfather's legacy and dedicates this mission in pursuit of justice for the
28 Hollywood Chamber to honor its obligation to install Robin's ☼ to his beloved sister who was still
around when the star was awarded to her grandfather. A true and correct copy of the emails between
Ora and Hillside Memorial Park on July 6, 2017 and between Ora and Ms. Martinez on July 11,
2017 regarding the documentation of Mrs. Robin's passing are attached hereto as Exhibit 19.

1 **V. CAUSES OF ACTION**
2 **FIRST CAUSE OF ACTION**
3 **(Breach of Contract)**

4 66. Plaintiff realleges and incorporates by reference the allegations in paragraphs 1
5 through 65 above as if fully set forth herein.¹²

6 67. In 1988, Robin's wife, Cherie Robin, and actor Bob Hope sponsored Leo for a
7 posthumous star on the Walk of Fame with the submission of an application, which is documented
8 in Ora's letter to the Walk of Fame Committee on July 11, 2017. (Verified in allegation no. 54) This
9 application submitted by the sponsors is further corroborated by the story issued on May 23, 2019
10 by Ashley Lee from the *LA Times* in her investigated story, *Leo Robin never got his Walk of Fame*
11 *star. Now his grandson is fighting for it*, wherein there is a photograph of the application contents
12 with the caption, "Materials from the original 1988 application for Leo Robin's posthumous star,
13 sent by his wife." (Verified in allegation no. 55) This application has all the specified terms of a
14 bona fide offer. (Verified in allegation no. 56)

15 68. On June 18, 1990, an acceptance letter signed by Johnny Grant, Chairman of the
16 1990 Walk of Fame Committee, was sent to Mrs. Robin. This is documented in Ora's letter on July
17 11, 2017 to the Walk of Fame committee saying, "I also appreciate your providing me with the
18 background of how Leo was awarded this star including...how on June 18, 1990 the Committee sent
19 a letter to the same address that was used on Mrs. Robin's original application, notifying her of the
20 award." (Verified in allegation no. 60) Ms. Lee on May 23, 2019 also tweeted, "at first I didn't
21 believe that Leo Robin's star had really slipped through the cracks" with a photo (shot by J. Chun of
22 The Times) of that acceptance letter and the envelope stamped "RETURN TO SENDER." (Verified
23 in allegation no. 62) The acceptance letter sent by the Hollywood Chamber on June 18, 1990
24 effectively accepts the offer made by the sponsors Robin's wife, Cherie Robin, and actor Bob Hope
25 in their application submitted to the Hollywood Walk of Fame resulting in a binding written
26 contract ("Robin ⚡ Contract").

27 69. On July 17, 2018, Ms. Martinez sent Ora an email where she stipulated, "From what
28 I gather you are now willing to have the star dedication happen with a ceremony?? There is the
29 sponsorship fee involved of 40,000.00. Please let me know when you would like to do the ceremony

12 All of these allegations are foundational and critical for this cause; in particular, there are many cited with substantial evidentiary support.

1 and once you give me a date we can move forward. I do have to get it re-instated by the Chair.
2 Please let me know if you do want to move forward. Thanks, Ana 'Handling the stars for many
3 moons!' Producer, Hollywood Walk of Fame, Vice President of Media Relations, Hollywood
4 Chamber of Commerce." (Verified in allegation no. 35)

5 70. On July 19, 2018, in an overnight envelope, Ora sent Ms. Martinez the date he
6 selected in 2019 for Leo's star ceremony, April 6th, his birthday, along with a check for \$4,000, the
7 fee that his grandmother and Bob Hope, the co-sponsors, had agreed to pay when they first filled
8 out the application back in 1988. Ora did everything in his power to fulfill performance of the
9 Robin ⚡ Contract which included a timely scheduled induction ceremony within two years of Ora's
10 discovery of Robin's star on July 6, 2017 (delayed by the Hollywood Chamber's actions and
11 inactions) and Ora's tendered payment of the original offer of \$4,000 in accordance with the Robin
12 ⚡ Contract (Verified in allegation no. 36).

13 71. On July 23, 2018, the Hollywood Chamber breached the Robin ⚡ Contract when
14 Ms. Martinez sent Ora's letter to her back to him along with the check he'd made payable to the
15 Hollywood Historic Trust for \$4,000 and cancelled the ceremony with this letter she wrote to him:
16 "Dear Mr. Ora, I received your check for \$4,000 which [I] am sending back to you. The approval of
17 Mr. Robins star lapsed many years ago. It would need to be reinstated by the Walk of Fame
18 Committee, which will next meet in June 2019. It is very likely the committee would require that
19 the fee be raised to the current approved level. I am happy to present this to the committee for their
20 consideration, but we are unable to accept or hold the check which you have sent. The application is
21 at www.walkoffame.com. Sincerely, Ana Martinez, Vice President, Media Relations." (Verified in
22 allegation no. 37)

23 72. The statutes of limitations ("SOL") for the Robin ⚡ Contract is governed by
24 California Code of Civil Procedure Section 337 which provides that a lawsuit for the breach of a
25 written contract generally must be filed within four years of the date the contract was breached. In
26 addition, California's "delayed-discovery rule" provides for a longer SOL in special cases. The
27 discovery rule "postpones accrual of a cause of action until the plaintiff discovers, or has reason to
28 discover, the cause of action." Ora could not have reasonably discovered facts supporting the cause
of action within the applicable SOL period until his discovery of Robin's ⚡ when he stumbled
across it on the web on July 6, 2017 (Verified in allegations no. 22 and no. 23); as soon as Ora
discovered Robin's ⚡, he immediately and diligently investigated to find out what happened on the
same day saying, "The only thing I could think of was to call the Hollywood Walk of Fame. When I

1 spoke to Ana Martinez there, I told her what I had just discovered and asked if it could possibly be
2 true...she confirmed it was true and said 'Nothing like this has ever happened before.'" (Verified in
3 allegation no. 24). It would not have been possible to have made this discovery earlier because the
4 acceptance letter was "Returned to Sender" and been kept secretly in the Hollywood Chamber's files
5 ever since. (Verified in allegation no. 45) Consequently, for this lawsuit, the SOL for the breach of a
6 written contract must be filed within four years of the date of the discovery by Ora of Robin's 🌟 on
7 July 6, 2017. This is the earliest date for determining when the SOL began running.

8 73. There are valid arguments that the date for determining when the SOL began running
9 could even be later under the circumstances. "Under the [delayed] discovery rule, the SOL begins to
10 run when the plaintiff suspects or should suspect that [his or] her injury was caused by wrongdoing,
11 that someone has done something wrong to [him or] her" (*Jolly v. Eli Lilly & Co.* (1988) 44 Cal.3d
12 1103, 1110). The delayed discovery suspends or delays the SOL deadline by not starting the SOL
13 time period until the Plaintiff discovers or by the exercise of reasonable diligence should have
14 discovered, both: (1) the harm; and (2) that was caused by the wrongdoing of the Defendants. Based
15 on *Jolly*, it's possible to show that the SOL didn't start to run until the *LA Times* ran their story on
16 May 23, 2019, wherein Ora learned from Ms. Lee reporting, "The envelope was returned to its
17 sender and has since remained in the Chamber of Commerce's records" and also tweeted, "at first I
18 didn't believe that Leo Robin's star had really slipped through the cracks" with a photo of that
19 acceptance letter and the envelope stamped "RETURN TO SENDER." (Verified in allegation no.
20 45) Therefore, the definitive SOL for the breach of a written contract must be filed within four years
21 of the date Ora discovered on May 23, 2019 this harm caused by the Defendants' wrongdoing.

22 74. As a result of the actions, inactions and omissions of Defendants resulting in the
23 breach of the Robin 🌟 Contract, as set forth above, Plaintiff herein seeks general, compensatory and
24 consequential damages in amounts to be shown in accordance with proof at the time of trial.
25

26 SECOND CAUSE OF ACTION

27 (Negligence)

28 75. Plaintiff realleges and incorporates by reference the allegations in paragraphs 1
through 74 above as if fully set forth herein.¹³

¹³ All of these allegations are critical and foundational for this cause; in particular, there are many cited with substantial evidentiary support.

1 76. The Hollywood Chamber didn't only breach the Robin ⚡ Contract with sponsors
2 Cherie Robin and actor Bob Hope, and now Ora but also did so by negligence, which constitutes a
3 tort of negligence. “[E]xpress contractual terms give rise to implied duties, violations of which may
4 themselves constitute breaches of contract. “Accompanying every contract is a common-law duty
5 to perform with care, skill, reasonable expedience, and faithfulness the thing agreed to be done, and
6 a negligent failure to observe any of these conditions is a tort, as well as a breach of the contract.”
7 The rule which imposes this duty is of universal application as to all persons who by contract
8 undertake professional or other business engagements requiring the exercise of care, skill and
9 knowledge; the obligation is implied by law and need not be stated in the agreement [citation].”
10 *Holguin v. Dish Network LLC*. 229 Cal.App.4th 1310 (2014)

11 77. Plaintiff can show that Defendants were negligent 31 years ago when the acceptance
12 letter was "Returned to Sender" and again over the past several years in the Hollywood Chamber's
13 recent dealings with Ora regarding Robin's ⚡. Negligence is the failure to use reasonable care to
14 prevent harm to others. A person can be negligent by acting or by failing to act. A person is
15 negligent if that person does something that a reasonably careful person would not do in the same
16 situation or fails to do something that a reasonably careful person would do in the same situation.
17 The Court must decide how a reasonably careful person would have acted in Defendants' situation.

18 78. When the acceptance letter was "Returned to Sender," the Hollywood Chamber owed
19 a duty of care in the delivery of the acceptance letter to the sponsors. This means that the
20 Hollywood Chamber undertakes to exercise reasonable care in processing the applications with
21 delivery of the acceptance letter to the sponsors Robin's wife, Cherie Robin, and actor Bob Hope.
22 The Hollywood Chamber owed a duty of care in exercising their performance competently and with
23 reasonable care when the acceptance letter was "Returned to Sender" and taking the necessary steps
24 to get it delivered to one of the sponsors.

25 79. The Hollywood Chamber breached its duty of care to the sponsors Cherie Robin and
26 Bob Hope, and now Ora because of their actions of placing the acceptance letter in their files and
27 inactions of not following up with Bob Hope on or around June 18, 2017 when the acceptance letter
28 was "Returned to Sender." Ms. Lee explained the Chamber's view, "A mistake it was not, noted
(Ana) Martinez to *The Times*. Back in 1989, before the ease of email and cell phones, honorees
were not as repeatedly and actively pursued to secure their star as they are today. That means no
follow-up letters and no calls to co-signers, even if Robin's application was co-signed by (Bob)
Hope, who has four stars on the Walk." When the acceptance letter was "Returned to Sender," it

1 appears the *LA Times* view was that the Hollywood Chamber should have attempted with follow-up
2 letters and calls to co-sponsors with Ms. Lee saying critically, "That means no follow-up letters and
3 no calls to co-signers, even if Robin's application was co-signed by (Bob) Hope, who has four stars
4 on the Walk." (Verified in allegation no. 45) In addition, the Hollywood Chamber's excuse to the
5 *LA Times*, "Back in 1989, before the ease of email and cell phones," is absurd since they could've
6 called Bob Hope on an old-fashioned phone. Further, Ms. Lee tweeted at the time, "at first I didn't
7 believe that Leo Robin's star had really slipped through the cracks" with a photo of that acceptance
8 letter and the envelope stamped "RETURN TO SENDER." (Verified in allegation no. 45) This use
9 of the idiom slipped through the cracks suggests negligence because the phrase is commonly
10 defined as "to not do something through neglect."¹⁴ For the most part, neglect and negligence are
11 synonymous. What the Chamber did after the letter was "Return to Sender" was not customary
12 practice but smacks of disregard for the awardee, Robin, honored by the Walk of Fame Committee.
13 The Hollywood Chamber didn't exercise reasonable care in handling the acceptance letter when it
14 was "Returned to Sender" and there were "no follow-up letters and no calls to co-signers....(Bob)
15 Hope." Consequently, the Hollywood Chamber breached its duty of care.

16 80. The Hollywood Chamber's conduct is the factual causation which caused harm and
17 damage to Ora and he can prove that the Hollywood Chamber's actions and inactions were the
18 actual cause of the Plaintiff's harm or damage. The Plaintiff's harm would not have occurred but for
19 the Defendants' actions. Anyone taking the time to apply as a sponsor for a candidate to receive a
20 star has to believe that the Hollywood Chamber would be able to process the chosen few
21 applications correctly. After all, throughout the past sixty years, the Hollywood Chamber has
22 successfully kept track of 2,696 honorees and has seen to it that each and every one of them
23 received a star, which was then successfully installed on the Hollywood Walk of Fame -- except for
24 Robin's ★. The probability is that if the Hollywood Chamber awards a star to an honoree and the
25 honoree plays by the rules, which the sponsors did in the instant case, then 100% of the time the star
26 will be installed with an unveiling ceremony and other customary practices.

27 81. In addition, the Hollywood Chamber's actions are the legal cause of the damage to
28 the Plaintiff because the Defendants could have reasonably foreseen at the time that their actions
might cause damage. The proximate cause was the Hollywood Chamber putting the acceptance

¹⁴ For example, according to the popular dictionary website Dictionary.Com, second only to Wikipedia.Org (which has no definition for this phrase) in 2021 website rankings for dictionaries, slipped through the cracks is defined as "Be neglected or overlooked."

1 letter in its files after it was "Returned to Sender" and made no attempt to resend it or "no follow-up
2 letters and no calls to co-signers, even if Robin's application was co-signed by (Bob) Hope, who has
3 four stars on the Walk." The Hollywood Chamber obstructed installation of Robin's ★ by placing
4 the envelope with the acceptance letter in its files, like throwing the acceptance letter away in the
5 trash, where it has since remained in the Hollywood Chamber's records ever since and made no
6 attempt to resend it and "no follow-up letters and no calls to...(Bob) Hope." (Verified in allegation
7 no. 45) All of these actions and inactions by the Hollywood Chamber produced reasonable
8 foreseeable consequences that Robin's ★ would not be installed on the Walk of Fame without
9 intervention from anyone else.

10 82. The Hollywood Chamber didn't only commit negligence with its handling of the
11 acceptance letter back in 1990, but history repeated itself by the Hollywood Chamber's negligence
12 in its recent dealings with Ora regarding Robin's ★. Again, the Court must decide how a reasonably
13 careful person would have acted in Defendants' situation. This means that the Hollywood Chamber
14 undertakes to exercise reasonable care when Ora attempted to engage with it regarding Robin's ★.
15 The Hollywood Chamber owed a duty of care in exercising their performance competently and with
16 reasonable care in assisting Ora with Robin's ★.

17 83. The Hollywood Chamber breached its duty of care to assist Ora several times when he
18 attempted to engage with it regarding Robin's ★. The Hollywood Chamber which administers this
19 famous sidewalk landmark usually assists honorees. In contradiction of its mission, the Hollywood
20 Chamber performed the opposite of its purpose and public expectations and did not do justice to the
21 nomination of Robin. Instead of assisting, when Ora sent correspondence from July 6, 2017 thru
22 July 10, 2018 to follow-up with the Hollywood Chamber including emails, phone calls and letters,
23 all of it was ignored and unanswered with no responses for slightly more than a year. (Verified in
24 allegations no. 29 through 42) In addition, the Hollywood Chamber failed to honor its promise for
25 the Walk of Fame Committee to consider Ora's request in his letter to them on July 11, 2017 for the
26 star to be placed on the Hollywood Walk of Fame. This negligence which took place when Ora first
27 contacted the Hollywood Chamber on July 6, 2017 was confirmed when Ora learned from Ellen K
28 that she never was consulted on Robin's ★ and is documented in Ora's thank you letter to Ellen K
on August 17, 2020 for responding in a phone call to him on August 11, 2020 to the open letter
press release he wrote to her earlier that day. (Verified in allegation no. 50) There are still more
instances of negligence such as an unfulfilled commitment made by Ms. Martinez in the *LA Times*
story to reinstate Robin's ★ by the Walk of Fame Committee at the annual meeting back in June of

1 2019. (Verified in allegations 44) What the Hollywood Chamber did when Ora engaged with it
2 regarding Robin's ★ was not customary practice but smacks of disregard for the awardee, Robin,
3 honored by the Walk of Fame Committee. The Hollywood Chamber didn't exercise reasonable care
4 in handling Robin's ★. Consequently, the Hollywood Chamber breached its duty of care.

5 84. The Hollywood Chamber's conduct is the factual causation which caused harm to
6 Ora and he can prove that the Hollywood Chamber's actions and inactions were the actual cause of
7 the Plaintiff's harm. The Plaintiff's harm would not have occurred but for the Defendants' actions.
8 Anyone taking the time to engage with the Hollywood Chamber as a sponsor for a candidate to
9 receive a star has to believe that it would be able to assist Ora with Robin's ★. As stated before, the
10 Hollywood Chamber has successfully kept track of 2,696 honorees and has seen to it that each and
11 every one of them received a star, which was then successfully installed on the Hollywood Walk of
12 Fame -- except for Robin's ★. The probability is that if the Hollywood Chamber awards a star to an
13 honoree and the honoree plays by the rules, which the sponsors did in the instant case, then 100% of
14 the time the star will be installed with an unveiling ceremony. In Robin's classic "Beyond the Blue
15 Horizon," he wrote majestic lyrics about the most predictable thing we know on Earth, "Beyond the
16 blue horizon Lies a rising sun"; the next most predictable thing may well be that if the Hollywood
17 Chamber awards a star to an honoree, then the star will be installed with an unveiling ceremony.

18 85. The Hollywood Chamber's actions are also the legal cause of the damage to the
19 Plaintiff because the Defendants could have reasonably foreseen at the time that its actions might
20 cause harm. The proximate cause was the Hollywood Chamber not assisting Ora. The Hollywood
21 Chamber obstructed installation of Robin's star by placing the envelope with the acceptance letter in
22 its files where it has since remained in the Hollywood Chamber's records ever since and then not
23 assisting Ora when he attempted to work with the Hollywood Chamber. Instead of assisting, when
24 Ora sent correspondence from July 6, 2017 thru July 10, 2018 to follow-up with the Hollywood
25 Chamber including emails, phone calls and letters, all of it was ignored and unanswered with no
26 responses for slightly more than a year. (Verified in allegations no. 29 through 42) In addition, the
27 Hollywood Chamber failed to honor its promise for the Walk of Fame Committee to consider Ora's
28 request in his letter to them on July 11, 2017 for the star to be placed on the Hollywood Walk of
Fame. This negligence which took place when Ora first contacted the Hollywood Chamber on July
6, 2017 was confirmed when Ora learned from Ellen K that she never was consulted on Robin's ★
and is documented in Ora's thank you letter to Ellen K on August 17, 2020 for responding in a
phone call to him on August 11, 2020 to the open letter press release he wrote to her earlier that

1 day. (Verified in allegation 50) There are still more instances of negligence such as an unfulfilled
2 commitment made by Ms. Martinez in the *LA Times* story to reinstate Robin's ★ by the Walk of
3 Fame Committee at the annual meeting back in June of 2019. (Verified in allegation no. 44) All of
4 these actions and inactions by the Hollywood Chamber produced reasonable foreseeable
5 consequences that Robin's ★ would not be installed on the Walk of Fame without intervention from
6 anyone else. (Verified in allegations 29 through 42)

6 86. As a result of the negligent actions, inactions and omissions of the Defendants, as set
7 forth above, where the Hollywood Chamber committed negligence with its handling of the
8 acceptance letter back in 1990 and again in its recent dealings with Ora regarding Robin's ★, and as
9 may otherwise be shown through proof at the time of trial, Plaintiff has suffered harm and damages,
10 which continues to this day including pain and suffering and severe emotional stress such as, but not
11 limited to, feelings of frustration, humiliation, hopelessness, disgust, worry and anxiety. Plaintiff's
12 burden is compounded as the trustee, on behalf of the Leo Robin Trust, which has a large family,
13 since he represents and carries the burden for all these members. (Verified in allegation no. 64)
14 Plaintiff has suffered and will continue to suffer general, compensatory, consequential damages,
15 pain and suffering, severe emotional stress and other amounts that have not been fully ascertained at
16 this time, but all of which will be more specifically shown in accordance with proof at the time of
17 trial.

17 87. Plaintiff alleges Defendants are guilty of malice and/or oppression as defined in Civil
18 Code section 3294, and Plaintiff should recover, in addition to other damages above in allegation
19 No. 86, punitive damages. Civil Code section 3294 provides, in pertinent part, as follows: "(a) In an
20 action for the breach of an obligation not arising from contract, where it is proven by clear and
21 convincing evidence that the defendant has been guilty of oppression, fraud, or malice, the plaintiff,
22 in addition to the actual damages, may recover damages for the sake of example and by way of
23 punishing the defendant." "Malice" means conduct which is intended by the defendant to cause
24 injury to the plaintiff or despicable conduct which is carried on by the defendant with a willful and
25 conscious disregard of the rights or safety of others" under Civil Code section 3294 (c)(1) and
26 "Oppression" means despicable conduct that subjects a person to cruel and unjust hardship in
27 conscious disregard of that person's rights" under Civ. Code § 3294(c)(2).

26 88. The Plaintiff can prove by clear and convincing evidence that the Defendants' conduct
27 amounted to malice and/or oppression pursuant to Civil Code section 3294. The Defendants'
28 reprehensible conduct involved a pattern that began more than 31 years ago. Ms. Lee from the *LA*

1 *Times* reported the actions by the Hollywood Chamber, "The envelope was returned to its sender
2 and has since remained in the Chamber of Commerce's records." Ms. Lee also reported
3 disapprovingly about the inactions by the Hollywood Chamber, "That means no follow-up letters
4 and no calls to co-signers, even if Robin's application was co-signed by (Bob) Hope, who has four
5 stars on the Walk." (Verification in allegation no. 45) The Hollywood Chamber knew the
6 consequences of its actions of placing the acceptance letter in the Hollywood Chamber's files and
7 inactions of not following up with Bob Hope meant that it was probable, like deep-sixing the
8 acceptance letter to the bottom of the ocean, that Robin's ★ would never be installed.

8 89. Unfortunately, history would repeat itself 27 years later when Ora tried all possible
9 means to confer with the Hollywood Chamber to install Robin's ★. It started with a phone call by
10 Ora to the Hollywood Chamber on July 6, 2017, followed by a letter to the Hollywood Chamber
11 very quickly after on July 11, 2017. Plaintiff would soon experience the trickery by the Hollywood
12 Chamber when Ora sent correspondence from July 6, 2017 thru July 10, 2018 to follow-up with the
13 Hollywood Chamber including emails, phone calls and letters -- all of it was ignored and
14 unanswered with no responses for slightly more than a year. Ora was deceived when he first
15 contacted the Hollywood Chamber on July 6, 2017 and given instructions to write a letter to the
16 Walk of Fame Committee because Ora learned later from Ellen K, a member of the Walk of Fame
17 Committee, that she never was consulted on Robin's ★ and this is documented in Ora's thank you
18 letter to Ellen K on August 17, 2020 for responding in a phone call to him on August 11, 2020 to
19 the open letter press release he wrote to her earlier that day. (Verified in allegation no. 50) This
20 practice by the Hollywood Chamber would play out again with its deceit when Ora and the
21 Hollywood Chamber made arrangements to move forward to install Robin's ★, which the
22 Hollywood Chamber abruptly terminated. (Verified in allegations no. 29 through 42) Then the
23 Hollywood Chamber pulled a stunt on Ora with an unfulfilled commitment made by Ms. Martinez
24 in the *LA Times* story to reinstate Robin's ★ by the Walk of Fame Committee at the annual meeting
25 back in June of 2019. (Verified in allegation 44) In each one of these instances above, the
26 Hollywood Chamber knew the consequences of its actions and inactions would result in the
27 outcome being probable that Robin's ★ would never be installed. The facts clearly demonstrate that
28 the Hollywood Chamber acted with a culpable state of mind or purpose of knowledge and knew the
consequences of its actions and inactions and this conduct of the Hollywood Chamber amounted to
malice and/or oppression.

1 90. As a direct and legal result of above-described reprehensible conduct of Defendants,
2 Plaintiff has suffered harm and damages, which continues to this day including pain and suffering
3 and severe emotional stress, such as, but not limited to, feelings of frustration, humiliation,
4 hopelessness, disgust, worry and anxiety. Plaintiff's burden is compounded as the trustee, on behalf
5 of the Leo Robin Trust, which has a large family, since he represents and carries the burden for all
6 these members some whom did not realize their dying wish -- to see Robin's ☼ at an unveiling
7 ceremony. (Verified in allegation no. 64) There are no words to describe the conduct of the Hollywood
8 Chamber but cruel and unjust. The Hollywood Chamber's conduct amounted to malice and oppression in
9 conscious disregard of Plaintiff's rights so as to entitle Plaintiff an award of exemplary damages.
10 Plaintiff herein seeks punitive damages in amounts to be shown in accordance with proof at the time
11 of trial.

11 91. The characterization of a claim affects the Plaintiff's right to relief in respect of time
12 limitations or SOL specially in a concurrent claim. The courts will generally consider the nature of
13 the contractual obligation to apply the contract SOL to the action claiming for damage caused by
14 Defendants' negligent failure to perform duties arising out of a contract. *Steiner v. Wenning*, 373
15 N.E.2d 366 (N.Y. 1977); *Wright v. Sears, Roebuck & Co.*, 355 So. 2d 353 (Ala. 1978). In the instant
16 case, the action sounds in contract by looking at the gravamen of the action. Because the
17 Defendants' negligent failure to perform duties arise out of the Robin ☼ Contract, the SOL for the
18 breach of duty in connection with Robin's ☼ is determined by the breach of contract action.
19 Therefore, the same rules that apply to the SOL for the breach of the Robin ☼ Contract will apply
20 for the Defendants' negligent failure to perform duties arising out of the Robin ☼ Contract. This
21 means the Defendants' negligent failure to perform duties is governed by California Code of Civil
22 Procedure Section 337 which provides that a lawsuit for the breach of their duty generally must be
23 filed within four years of the date Robin's ☼ was discovered under California's "delayed-discovery
24 rule" as stated above. Consequently, for this lawsuit, the SOL for the negligence action must be filed
25 within four years of the date Robin's ☼ was discovered on July 6, 2017. This is the earliest date for
26 determining when the SOL began running since, as stated above, there are valid arguments that the
27 date for determining when the SOL began running could even be later under the circumstances.
28 Therefore, the definitive SOL for the negligence action must be filed within four years of the date
Ora discovered on May 23, 2019 the harm caused by the Defendants' wrongdoing.

 92. The Plaintiff could make an equal compelling argument under a theory of tort in
determining the SOL that would allow the Plaintiff to file the negligence cause of action at this

1 time. Accordingly, for the reasons stated in allegation no. 91, it is more logical to use the same
2 statute period for the various causes of action and unnecessary to analyze this theory to determine
3 the SOL.

4 **THIRD CAUSE OF ACTION**

5 **(Permanent Injunctive Relief against All Defendants)**

6 93. Plaintiff realleges and incorporates by reference the allegations in paragraphs 1
7 through 92 above as if fully set forth herein.¹⁵

8 94. The Plaintiff has suffered great and irreparable harm for the past 31 years, presently
9 and continuously, because the Defendants have breached the Robin ⚡ Contract by failing to fulfill
10 its obligation in accordance with the agreement to install the star awarded to Robin on the Walk of
11 Fame accompanied by a traditional unveiling ceremony with all other customary practices that take
12 place with the award of a star. If not enjoined by this Court, Defendants will continue to cause
13 irreparable harm to Plaintiff. The remedies available at law, such as monetary damages, are
14 inadequate to compensate for the harm because of the uniqueness of the award as described earlier,
15 "The Walk of Fame is a National Historic Landmark, which comprises of 2,696 (as of this date)
16 five-pointed terrazzo and brass stars embedded in the sidewalks...The stars are permanent public
17 monuments to achievement in the entertainment industry." This unique star would bear the name
18 Leo Robin and become a part of Hollywood's history. (Verified in allegation no. 12). Finally, the
19 Plaintiff has demonstrated the likelihood that he will prevail on the merits of the underlying
20 controversy and the remedy in equity is warranted upon consideration of the balance of equities or
21 hardships between the Plaintiff and Defendants which weighs in the Plaintiff's favor.

22 95. Ora has tried all possible means ever since his discovery on July 6, 2017 of Robin's
23 ⚡ to confer with the Hollywood Chamber to install Robin's ⚡ including a) starting with a phone
24 call from Ora to the Hollywood Chamber on July 6, 2017; b) followed by a letter from Ora to the
25 Hollywood Chamber very quickly after on July 11, 2017; c) then from July 6, 2017 thru July 10,
26 2018 when Ora sent correspondence to follow-up with the Hollywood Chamber including emails,
27 phone calls and letters, all of it was ignored and unanswered with no responses for slightly more
28 than a year; d) then a brief conversation between the parties, which included where Ora and the
Hollywood Chamber made arrangements to move forward to install Robin's ⚡, which the

15 All of these allegations are critical and foundational for this cause; in particular, there are many cited with substantial evidentiary support.

1 Hollywood Chamber abruptly terminated; e) the unconscionable decision on July 23, 2018 by the
2 Hollywood Chamber to delay consideration of reinstating Robin's ⚡ for another year at the next
3 meeting in June of 2019; f) then an unfulfilled commitment made by Ms. Martinez in the *LA Times*
4 story to reinstate Robin's ⚡ by the Walk of Fame Committee at the annual meeting back in June of
5 2019; g) next a series of press releases to start a conversation with members of the Walk of Fame
6 Committee which occurred but not productive; and h) finally, on June 18, 2021, Ora sent a Demand
7 Letter to Rana Ghadban, President and CEO of the Hollywood Chamber, for the Hollywood
8 Chamber to finally honor its obligation to install the star of Leo Robin with a traditional ceremony
9 to accompany the unveiling of the star but, as of today, there has been no response. In the end, the
10 Hollywood Chamber ultimately failed to do the right thing by not fulfilling its obligation to install
11 the star awarded to Robin on the Walk of Fame in accordance with the Robin ⚡ Contract. (Verified
12 in allegations no. 29 through 52)

11 96. Robin and the Plaintiff have been treated unjustly by the Hollywood Chamber
12 because the Defendants have not fulfilled its obligation in accordance with Robin ⚡ Contract made
13 in 1990. By denying Plaintiff the installation of the star awarded to Robin on the Walk of Fame
14 accompanied by a traditional unveiling ceremony with all other customary practices that take place
15 with the award of a star, the Defendants have harmed the legacy of Robin, and Ora, individually,
16 and in his derivative capacity as trustee of the Leo Robin Trust, on behalf of the Leo Robin Trust.

17 97. Accordingly, Ora, individually, and as Trustee, on behalf of the Leo Robin Trust,
18 has no adequate remedy at law and is entitled to permanent injunctive relief in the form of a
19 judgment compelling the Hollywood Chamber to comply with the Robin ⚡ Contract by the
20 following instructions: a) To install Robin's ⚡ on the Walk of Fame; b) For a traditional ceremony
21 to accompany the unveiling of the star; c) For Ora to be given a star plaque; d) For Ora to be given
22 the actual acceptance letter, not a copy, from the Hollywood Chamber addressed to Mrs. Robin; and
23 e) For all other customary practices that take place with the award of a star.

24 PRAYER FOR RELIEF

25 98. Plaintiff realleges and incorporates by reference the allegations in paragraphs 1
26 through 97 above as if fully set forth herein.

27 WHEREFORE, for the above stated reasons, Plaintiff prays for judgment by the Honorable
28 Court as follows:

- 1 1. An injunction ordering the Hollywood Chamber to comply with the Robin ♂
2 Contract by the following instructions:
3 a) To install Robin's ♂ on the Walk of Fame;
4 b) For a traditional ceremony to accompany the unveiling of the star;
5 c) For Ora to be given a star plaque;
6 d) For Ora to be given the actual acceptance letter, not a copy, from the Hollywood
7 Chamber addressed to Mrs. Robin; and
8 e) For all other customary practices that take place with the award of a star;
9 2. Ora will fulfill the sponsors obligation of \$4,000 to be tendered to the Hollywood
10 Historic Trust immediately upon the Court's order of injunctive relief in No.1 above in prayer for
11 relief;
12 3. For general, compensatory and consequential damages in amounts to be shown in
13 accordance with proof at the time of trial;
14 4. For punitive damages in amounts to be shown in accordance with proof at the time of
15 trial;
16 5. For reasonable attorneys' fees and litigation costs, expert fees and costs and any other
17 Plaintiff's costs of the proceedings herein; and
18 6. For any such other and further relief as this Court may deem just and proper.

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DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury of all claims and causes of action so triable in this lawsuit.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed in Sherman Oaks, California
DATED: June 29, 2021

Respectfully Submitted,

By: Scott Douglas Ora
Scott Douglas Ora
In Pro Per

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VERIFICATION

I, Scott Douglas Ora, declare as follows:

1. I, individually, and in my derivative capacity as trustee of the Leo Robin Trust, on behalf of the Leo Robin Trust, am the Plaintiff in the above-entitled matter.

2. I have read the foregoing complaint and know the contents thereof. The same is true of my own knowledge, except as to those matters which are therein stated on information and belief, and, as to those matters, I believe it to be true.

3. I, in my derivative capacity as trustee of the Leo Robin Trust, on behalf of the Leo Robin Trust, have personal knowledge of Leo Robin Trust, its activities, and its intentions, including those set out in the foregoing Verified Complaint. I, as trustee, have read the foregoing complaint and know the contents thereof. The same is true of my own knowledge, except as to those matters which are therein stated on information and belief, and, as to those matters, I believe it to be true.

4. I, individually and as trustee, have personal knowledge of myself, my activities, and my intentions, including those set out in the foregoing Verified Complaint and if called on to testify I would competently testify as to the matters stated herein.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed in Sherman Oaks, California
DATED: June 29, 2021

By: Scott Douglas Ora
Scott Douglas Ora

Exhibit 1



The Discovery of Leo's Long-lost Star

After all these years, the existence of Leo's long-lost star has finally been discovered. If anyone deserved a star more, it would be Leo. He was sent out to Hollywood in 1928 to be a hit-maker for Paramount when movies were just beginning to have sound and song. He wrote perfect lyrics for some of the greatest songs that stars at the start of their careers would sing in Hollywood's golden-era films like "Blue Hawaii" for Bing Crosby, "Thanks for the Memory" for Bob Hope and "Diamonds Are a Girl's Best Friend" for Marilyn Monroe. These songs were instrumental in shaping many of these artists' careers and allowed them to shine.

The songs that Leo wrote for films were also made famous by jazz artists. "Easy Living" was written for the Paramount film of the same name in 1937 and was recorded that same year by Billie Holiday. It became a hit and would be forever associated with Lady Day. "If I Should Lose You" was introduced in the 1935 film Rose of the Rancho and was recorded fourteen years later by Charlie Parker. It was Parker's version of this song that brought it to the attention of pianist George Shearing and vocalists Frank Sinatra and Nina Simone.

Leo's influence on jazz was as great as it was on Hollywood. Because of this, I take great interest in knowing what's happening in the jazz world and this is how on July 6, 2017 I found myself gazing at Lincoln Center's Jazz Academy webpage where the newly released announcement of the 2017 inductees to the Ertugan Hall of Fame caught my eye. I was already familiar with two of the three winners, Don Redman and McCoy Tyner, both of whom had recorded some of Leo's songs; however, I was not familiar with the third winner.

I wanted to learn more about the third inductee, Tito Puentes, so I began to search for him online along with Leo's name and was directed to page 311 of Tito Puentes: When the Drums Are Dreaming, a biography, by Josephine Powell. It was here the book noted that Tito Puentes was awarded a star on the Hollywood Walk of Fame in 1990, and then went on to say Leo Robin was awarded a posthumous star that same year. I was stunned **Continue Reading in the Newsroom (select from the menu above)**



July 11, 2017 8:30 AM PST
Letter to the Walk of Fame Committee
Not Published

July 6, 2017 3:42 PM PST
The Discovery told by the Grandson

The Discovery of Leo's Long-lost Star

The Discovery of Leo's Long-lost Star (Continued from the Home page)

and went back to reread the paragraph a number of times. How could my family and I never have known this about my grandfather? And to think that it happened 27 years ago! I was in disbelief! The only thing I could think of was to call the Hollywood Walk of Fame. When I spoke to Ana Martinez there, I told her what I had just discovered and asked if it could possibly be true. She put me on hold a few minutes while she checked her records. When she returned, she confirmed it was true and said "Nothing like this has ever happened before."

Exhibit 2

Walk of Fame Committee
c/o Ana Martinez, Hollywood Chamber of Commerce
6255 Sunset Boulevard, Suite 150
Hollywood, CA 90028

July 11, 2017

Dear Ms. Martinez,

It was a pleasure speaking with you on the phone this past Thursday. Thank you for taking the time to research and confirm that my grandfather, the songwriter, Leo Robin, was posthumously awarded a star on the Hollywood Walk of Fame in 1990.

Because of Leo Robin's influence on jazz music and artists, I take great interest in knowing what's happening in the jazz world today. Last Thursday, I was visiting a page at Lincoln Center's website that focused on their Jazz Academy. It was there that the three new inductees to the Ertugan Hall of Fame were announced. I was familiar with two, Don Redman and McCoy Tyner, who both recorded some of Leo's songs. The third inductee, Tito Puente, I wanted to learn more about, so I researched him on the web and accidentally stumbled onto a biography, *Tito Puente: When the Drums Are Dreaming* by Josephine Powell. The book noted Tito Puente was awarded a star in 1990, and then went on to say Leo Robin was awarded a posthumous star that same year. I was stunned when I came across this -- it happened 27 years ago -- and that is the moment when I called you for confirmation.

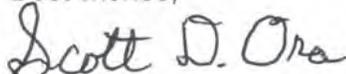
I also appreciate your providing me with the background of how Leo was awarded this star including how your records show that in 1988 both my grandmother, Cherie Robin, and actor, Bob Hope, sponsored Leo for a star on the Walk of Fame and how on June 18, 1990 the Committee sent a letter to the same address that was used on Mrs. Robin's original application, notifying her of the award. Tragically, she did not live long enough to receive this letter and to learn that all of her efforts to get Leo a star on the Walk of Fame were successful because Mrs. Robin passed away on May 28, 1989, almost exactly one year before the letter was sent out. Unfortunately, no one else in my family was aware of the nomination, let alone the award. You explained to me that the Committee had never experienced a situation like this before.

In the normal course of events, upon receiving notice of the award, Mrs. Robin would have been elated and immediately would have set the ceremony date. Unfortunately, this did not happen. I want to bring closure to the wishes of my grandmother, Mrs. Robin, to honor her husband's legacy with a star on the Hollywood Walk of Fame. (I am forwarding to you separately an email that Hillside Memorial Park sent to me that provides the documentation of Mrs. Robin's passing) and although it is unfortunate that she cannot be at the ceremony, it will allow anyone and everyone who gazes at that star to give "Thanks for the Memory." This would be a wonderful tribute to a legend who made great contributions to the music and motion picture industries from the dawning of sound onward and whose enduring lyrics have become part of the fabric of our culture.

In light of these bizarre circumstances, I, as Leo's grandson and trustee of *Leo Robin Music*, humbly request that the Walk of Fame Committee reinstate the award to Leo of the posthumous star.

Thank you and the Walk of Fame Committee for your help.

Best wishes,



Scott D. Ora

Trustee of *Leo Robin Music*

Exhibit 3

-----Original Message-----

From: Gubler, Leron <Leron@hollywoodchamber.net>

To: sdo007 <sdo007@aol.com>; Martinez, Ana <stargirl@hollywoodchamber.net>

Sent: Wed, Sep 5, 2018 2:15 pm

Subject: RE: Leo Robin

Dear Mr. Ora:

I'm responding to your latest inquiry to Ana Martinez, our Walk of Fame Producer. Ana has briefed me on your request to reinstate the approval of a star for Leo Robin. As Ana has explained to you, we have existing protocols that must be followed to reinstate star approval. The earliest this can be done is at next year's Walk of Fame Committee meeting in June 2019. I understand that you are requesting the fee to be reduced to \$4,000, which was the fee that was in place back in 1990, when Mr. Robin was first approved. Unfortunately, that is not possible. The committee will never approve the reinstatement unless there is a sponsorship in place to pay the fee at the current rate. There would be no purpose in our bringing this to the committee without that commitment. The application deadline for consideration by the committee is May 31, 2019, so you still have plenty of time to work on finding a sponsor. Please stay in touch with Ana, and advise her when you are able to find a sponsor. Then we would be happy to present it to the committee again.

Best regards,
Leron Gubler

Leron Gubler

President & CEO

Hollywood Chamber of Commerce

6255 Sunset Blvd, Ste 150, Hollywood, Ca 90028

[323-469-8311](tel:323-469-8311) x12

leron@hollywoodchamber.net

www.hollywoodchamber.net | www.walkoffame.com

From: sdo007@aol.com <sdo007@aol.com>

Sent: Wednesday, September 5, 2018 1:56 PM

To: Martinez, Ana <stargirl@hollywoodchamber.net>

Cc: Gubler, Leron <Leron@hollywoodchamber.net>

Subject: Leo Robin

Dear Ms. Martinez,

When we last communicated on July 31st, you suggested that we could further discuss Leo's star when Leron Gubler returned from his vacation in mid-August. Now that August has come and gone and Labor Day is over, please let me know how we can proceed.

Best wishes,

Scott D. Ora

Trustee of Leo Robin Music

<http://leorobin.com/>

-----Original Message-----

From: sdo007 <sdo007@aol.com>

To: stargirl <stargirl@hollywoodchamber.net>

Cc: leron <leron@hollywoodchamber.net>

Sent: Tue, Jul 31, 2018 12:36 pm

Subject: Fwd: Leo Robin

Dear Ms. Martinez,

I look forward to further discussion when Leron Gubler returns from his vacation.

Best wishes,

Scott D. Ora

Trustee of Leo Robin Music

<http://leorobin.com/>

-----Original Message-----

From: Martinez, Ana <stargirl@hollywoodchamber.net>

To: sdo007 <sdo007@aol.com>

Cc: Gubler, Leron <Leron@hollywoodchamber.net>

Sent: Mon, Jul 30, 2018 2:46 pm

Subject: RE: Leo Robin

It shouldn't be a problem to reinstate but the fee is \$40,000. Prices have gone up. We can discuss further when Leron gets back from his vacation in mid-August.

Handling the stars for many moons!

Ana Martinez

Producer, Hollywood Walk of Fame

Vice President of Media Relations

Hollywood Chamber of Commerce

6255 Sunset Blvd, Ste 150, Hollywood, Ca 90028

323-469-8311 Press Line-323 468-1376

| stargirl@hollywoodchamber.net

@wofstargirl

www.hollywoodchamber.net | www.walkoffame.com

From: sdo007@aol.com [<mailto:sdo007@aol.com>]
Sent: Monday, July 30, 2018 2:25 PM
To: Martinez, Ana <stargirl@hollywoodchamber.net>
Cc: Gubler, Leron <Leron@hollywoodchamber.net>
Subject: Re: Leo Robin

Dear Ms. Martinez,

Please see my response to your most recent letter and relevant correspondence in the attachments.

If you have any questions, please feel free to call me at (818) 618-2572.

Best wishes,

Scott

<http://leorobin.com/>

-----Original Message-----

From: Martinez, Ana <stargirl@hollywoodchamber.net>

To: sdo007 <sdo007@aol.com>

Sent: Tue, Jul 17, 2018 2:38 pm

Subject: Leo Robin

From what I gather you are now willing to have the star dedication happen with a ceremony?? There is the sponsorship fee involved of 40,000.00. Please let me know when you would like to do the ceremony and once you give me a date we can move forward. I do have to get it re-instated by the Chair.

Please let me know if you do want to move forward.

Thanks,

Ana

Handling the stars for many moons!

Ana Martinez

Producer, Hollywood Walk of Fame

Vice President of Media Relations

Hollywood Chamber of Commerce

6255 Sunset Blvd, Ste 150, Hollywood, Ca 90028

323-469-8311 Press Line-323 468-1376

| stargirl@hollywoodchamber.net

@wofstargirl

www.hollywoodchamber.net | www.walkoffame.com

-----Original Message-----

From: sdo007 <sdo007@aol.com>

To: stargirl <stargirl@hollywoodchamber.net>

Sent: Thu, Jul 12, 2018 12:51 pm

Subject: Re: Songwriter Leo Robin

Dear Ms. Martinez,

It was great to hear from you.

Please see my response in the attachment.

If you have any questions, please feel free to call me at (818)618-2572.

Best wishes,

Scott

<http://leorobin.com>

-----Original Message-----

From: Martinez, Ana <stargirl@hollywoodchamber.net>

To: sdo007 <sdo007@aol.com>

Sent: Tue, Jul 10, 2018 12:15 pm

Subject: RE: Songwriter Leo Robin

Hi Scott, I resent this to my boss. I don't know that it will happen as it has to be sponsored and you said you didn't want to have a ceremony or the fanfare that comes with the event which is why we do this. Let's see what he says.

Handling the stars for many moons!

Ana Martinez

Producer, Hollywood Walk of Fame

Vice President of Media Relations

Hollywood Chamber of Commerce

6255 Sunset Blvd, Ste 150, Hollywood, Ca 90028

323-469-8311 Press Line-323 468-1376

| stargirl@hollywoodchamber.net

[@wofstargirl](https://www.instagram.com/wofstargirl)

www.hollywoodchamber.net | www.walkoffame.com

From: sdo007@aol.com [mailto:sdo007@aol.com]
Sent: Tuesday, July 10, 2018 6:21 AM
To: Martinez, Ana <stargirl@hollywoodchamber.net>
Subject: Fwd: Songwriter Leo Robin

Dear Ms. Martinez,

With the passage of the Fourth of July Holiday, certainly hope you had an enjoyable one, and the beginning of summer,

I am just following up again regarding the status of the email I sent to you and the Walk of Fame Committee on July 11, 2017 after our phone conversation of the 6th regarding the posthumous star that was awarded in 1990 to my grandfather, the songwriter Leo Robin, on the Hollywood Walk of Fame.

Please feel free to call me at (818) 618-2572 if you have any questions.

Best wishes,

Scott

<http://leorobin.com>

-----Original Message-----

From: sdo007 <sdo007@aol.com>
To: intern <intern@hollywoodchamber.net>
Sent: Wed, May 16, 2018 1:50 pm
Subject: Fwd: Songwriter Leo Robin

-----Original Message-----

From: sdo007 <sdo007@aol.com>
To: stargirl <stargirl@hollywoodchamber.net>
Sent: Tue, Mar 20, 2018 2:01 pm
Subject: Fwd: Songwriter Leo Robin

Dear Ms. Martinez,

I am just following up again and look forward to hearing from you regarding the status of the email I sent to you and the Walk of Fame Committee on July 11th after our phone conversation of the 6th regarding the posthumous star that was awarded in 1990 to my grandfather, the songwriter Leo Robin, on the Hollywood Walk of Fame.

Please feel free to call me at (818) 618-2572 if you have any questions.

Best wishes,

Scott

<http://leorobin.com>

-----Original Message-----

From: sdo007 <sdo007@aol.com>
To: stargirl <stargirl@hollywoodchamber.net>
Sent: Thu, Dec 21, 2017 10:44 am
Subject: Fwd: Songwriter Leo Robin

Dear Ms. Martinez,

I hope you are having an enjoyable Holiday season and wish you a Blessed, Healthy & Happy New Year!

I am just following up and look forward to hearing from you regarding the status of the email I sent to you and the Walk of Fame Committee on July 11th after our phone conversation of the 6th regarding the posthumous star that was awarded in 1990 to my grandfather, the songwriter Leo Robin, on the Hollywood Walk of Fame.

Please feel free to call me at (818) 618-2572 if you have any questions.

Best wishes,

Scott

<http://leorobin.com>

-----Original Message-----

From: sdo007 <sdo007@aol.com>
To: stargirl <stargirl@hollywoodchamber.net>

Sent: Tue, Sep 12, 2017 11:03 am
Subject: Fwd: Songwriter Leo Robin

Dear Ms. Martinez,

With the passage of Labor Day, certainly hope you had an enjoyable one, and the last days of summer,

I just wanted to find out the status of the email I sent to you and the Walk of Fame Committee on July 11th after our phone conversation of the 6th regarding the posthumous star that was awarded in 1990 to my grandfather, the songwriter Leo Robin, on the Hollywood Walk of Fame.

Please feel free to call me at (818) 618-2572 if you have any questions.

Best wishes,

Scott

<http://leorobin.com>

-----Original Message-----

From: sdo007 <sdo007@aol.com>
To: stargirl <stargirl@hollywoodchamber.net>
Sent: Mon, Aug 7, 2017 9:19 am
Subject: Fwd: Songwriter Leo Robin

Dear Ms. Martinez,

I just wanted to make sure you received the email I sent to you and the Walk of Fame Committee on July 11th after our phone conversation of the 6th regarding the posthumous star that was awarded to my grandfather, the songwriter Leo Robin, on the Hollywood Walk of Fame in 1990.

Please feel free to call me at (818) 618-2572 if you have any questions.

Best wishes,

Scott

<http://leorobin.com>

-----Original Message-----

From: sdo007 <sdo007@aol.com>
To: stargirl <stargirl@hollywoodchamber.net>
Sent: Tue, Jul 11, 2017 8:30 am
Subject: Re: Songwriter Leo Robin

Dear Ms. Martinez,

Please find attached the letter Re: Songwriter Leo Robin to you and the Walk of Fame Committee as a PDF file.

If you have any questions, please feel free to call me at (818)618-2572.

Best wishes,

Scott

<http://leorobin.com/>

Exhibit 4

Walk of Fame Committee
c/o Ana Martinez, Hollywood Chamber of Commerce
6255 Sunset Boulevard, Suite 150
Hollywood, CA 90028

July 11, 2018

Dear Ms. Martinez,

Thank you for your response to put in play the posthumous star that was awarded in 1990 to my grandfather, the songwriter Leo Robin, on the Hollywood Walk of Fame. At the time when I spoke to you, my decision not to have too much fanfare in connection with the ceremony was based, primarily, due to my ongoing recovery from surgery after being wheelchair bound but today, fortunately, I have recovered well with full return to ambulation and function in my legs. I look forward to proudly attending the ceremony to celebrate my grandfather's star with my family including my brother, many nieces and nephews and extended family.

We would expect an exceptional turnout for a grand celebration since the music of Leo Robin is just as important today as it was when it was first heard. In 1935, Billie Holiday got her big break, recording an early Leo Robin and Ralph Rainger hit, "Miss Brown to You," followed in 1937 by her recording of another song of theirs, "Easy Living," that went on to become a classic, starting her on a journey that would establish her as one of the most important building blocks of jazz music. In 1939, Robin and Rainger received the Oscar for "Thanks for the Memory," which became Bob Hope's theme song. Similarly, in 1953, Marilyn Monroe starred in the movie *Gentlemen Prefer Blondes* with a score written by Leo Robin and Jule Styne where she sang "Diamonds Are a Girl's Best Friend," which would become her signature song. These are just a few milestones in Leo's influential and illustrious career.

We would love to be given the opportunity for the Hollywood, Broadway and jazz community to come together along with the scores of fans of Leo's music to celebrate this joyous occasion with us. I believe that many artists from all these musical venues who have sung a song of Leo Robin would love to attend -- jazz artists such as -- Tony Bennett, George Benson, Diana Krall, Michael Feinstein, Norah Jones, Seth MacFarlane, Jane Monheit and Michael Bubl ; actors such as -- Carol Channing, Doris Day and Nicole Kidman; and pop artists such as -- Aretha Franklin, Barbra Streisand, Connie Francis, Diana Ross, Dionne Warwick, Dolly Parton, Kenny Rogers with gospel group Take 6, Gladys Knight, Johnny Mathis, Liza Minnelli, Pat Boone, Shirley Bassey, Cyndi Lauper, Rod Stewart, Ariana Grande, Beyonc , Christina Aguilera, Kylie Minogue, Nicole Scherzinger and Madonna.

In addition, many Broadway stars who are currently performing some of Leo's songs in stage shows could attend -- stars such as -- acclaimed Broadway actress Ruby Lewis who plays Marilyn Monroe in *Marilyn! The New Musical* at Paris Las Vegas; Tony Award winner Karen Olivo and Aaron Tveit who star in the Broadway bound *Moulin Rouge! The Musical*, based on Baz Luhrmann's 2001 beloved motion picture; Tony Award winner Audra McDonald who starred as Billie Holiday in the Broadway hit show *Lady Day at Emerson's Bar and Grill* and other stage stars from the two-year run of *Baz – Star Crossed Love* at The Palazzo Las Vegas.

There are also many people from the film industry who may have an interest in attending. Those who were involved in recently released films that showcase Leo's songs -- such as -- "Easy Living" in Todd Haynes' *Carol*; "I Can't Escape from You" in Andy Goddard's *A Kind of Murder*; "It's June in January" in Woody Allen's *Cafe Society*; and "Zing a Little Zong" in John Crowley's *Brooklyn*. There are numerous people associated with films from the past, as well, for example, what immediately comes to mind is "Easy Living" in Clint Eastwood's 1995 romantic drama *The Bridges of Madison County*.

I know this would be a wonderful tribute for the celebration of a legend who made great contributions to the music and motion picture industries and whose enduring lyrics have become part of the fabric of our culture. My grandmother and actor Bob Hope sponsored Leo for a star on the Hollywood Walk of Fame and their wishes after all these years would finally be realized. For almost a century, Leo Robin's music has made the most celebrated stars on the Hollywood Walk of Fame beam even brighter. Leo Robin belongs in this constellation and his star shall shine as bright as any.

Thank you and the Walk of Fame Committee for your consideration to reinstate the award to Leo Robin. Please feel free to call me at (818) 618-2572 if you have any questions.

Best wishes,


Scott D. Ora

Trustee of Leo Robin Music

Exhibit 5

Walk of Fame Committee
c/o Ana Martinez, Hollywood Chamber of Commerce
6255 Sunset Boulevard, Suite 150
Hollywood, CA 90028

July 19, 2018

Dear Ms. Martinez,

We are happy to learn that you and the Walk of Fame Committee are taking the necessary steps to reinstate the posthumous star that was awarded in 1990 to my grandfather, Leo Robin. The ideal date for the star dedication and ceremony would be April 6, 2019 because April 6th is Leo's birthday.

I understand that there is a sponsorship fee of \$40,000 for stars awarded to present-day nominees. The first time we spoke on July 6, 2017 you explained to me that the Walk of Fame Committee had never experienced a mix-up like this before and it is my hope that the Chair of the Committee will take these special circumstances into account. This case is a reinstatement of a star that was awarded to Leo in 1990. Both my grandmother, Cherie Robin, and actor, Bob Hope, sponsored Leo in 1988 and they agreed to accept responsibility based on the original terms for payment of the fee of \$4,000. It is our desire to honor the original commitment made by the sponsors.

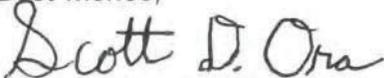
It was pure serendipity when technology allowed me to come across news about my grandfather that happened 27 years ago. It was my interest in jazz that led me to research Tito Puente on the web and accidentally stumble onto a biography, *Tito Puente: When the Drums Are Dreaming* by Josephine Powell. The book noted Tito Puente was awarded a star in 1990, and then went on to say Leo Robin was awarded a posthumous star that same year. It would be inexplicable and unconscionable to have to pay a different amount for Leo's star than Tito Puente paid for his since they were both awarded stars at the same time in the same year. In fact, the book further mentions the entire 1990-1991 class and I understand the star for each nominee of that year cost \$4,000, even Woody Woodpecker's. It would only be logical for the sponsor of Leo to pay the same amount.

I can't help but feel that this award is a bittersweet moment for the family of Leo Robin. It reminds me of the bittersweet duet that Leo wrote, "Thanks for the Memory," sung by Bob Hope and Shirley Ross in *The Big Broadcast of 1938* where they play a divorced couple reminiscing about their time together. It's unfortunate that the original sponsors -- my grandmother and Bob Hope -- are not here today to accept the honors and that generations of Leo's family who were here when the award was offered are no longer around -- my dear parents and Leo's wonderful four sisters and brother, all who adored him. This leaves the younger generations of Leo's family to attend -- his grandchildren and many nieces and nephews -- all who adored and idolized him.

We know you are the best at putting together a celebratory event and we look forward to proudly attending what we believe will be one of the most memorable ever on the Hollywood Walk of Fame.

Please find enclosed a check in the amount of \$4,000 payable to the Hollywood Historic Trust to honor the original commitment made by my grandmother and Bob Hope to sponsor the event. If you have any questions, please feel free to call me at (818) 618-2572.

Best wishes,


Scott D. Ora

Trustee of Leo Robin Music

Exhibit 6



July 23, 2018

Mr. Scott Ora

4735 Sepulveda Blvd. Apt. 460

Sherman Oaks, Ca 91403-5483

Dear Mr. Ora,

I received your check for \$4,000.00 which am sending back to you. The approval of Mr. Robins star lapsed many years ago. It would need to be reinstated by the Walk of Fame Committee, which will next meet in June 2019. It is very likely that the committee would require that the fee be raised to the current approved level. I am happy to present this to the committee for their consideration, but we are unable to accept or hold the check which you have sent. The application is at www.walkoffame.com

Sincerely,

A handwritten signature in blue ink that reads "Ana Martinez". The signature is fluid and cursive.

Ana Martinez

Vice President Media Relations

Cc: Leron Gubler

Walk of Fame Committee
c/o Ana Martinez, Hollywood Chamber of Commerce
6255 Sunset Boulevard, Suite 150
Hollywood, CA 90028

July 19, 2018

Dear Ms. Martinez,

We are happy to learn that you and the Walk of Fame Committee are taking the necessary steps to reinstate the posthumous star that was awarded in 1990 to my grandfather, Leo Robin. The ideal date for the star dedication and ceremony would be April 6, 2019 because April 6th is Leo's birthday.

I understand that there is a sponsorship fee of \$40,000 for stars awarded to present-day nominees. The first time we spoke on July 6, 2017 you explained to me that the Walk of Fame Committee had never experienced a mix-up like this before and it is my hope that the Chair of the Committee will take these special circumstances into account. This case is a reinstatement of a star that was awarded to Leo in 1990. Both my grandmother, Cherie Robin, and actor, Bob Hope, sponsored Leo in 1988 and they agreed to accept responsibility based on the original terms for payment of the fee of \$4,000. It is our desire to honor the original commitment made by the sponsors.

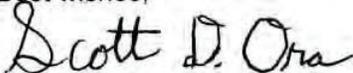
It was pure serendipity when technology allowed me to come across news about my grandfather that happened 27 years ago. It was my interest in jazz that led me to research Tito Puente on the web and accidentally stumble onto a biography, *Tito Puente: When the Drums Are Dreaming* by Josephine Powell. The book noted Tito Puente was awarded a star in 1990, and then went on to say Leo Robin was awarded a posthumous star that same year. It would be inexplicable and unconscionable to have to pay a different amount for Leo's star than Tito Puente paid for his since they were both awarded stars at the same time in the same year. In fact, the book further mentions the entire 1990-1991 class and I understand the star for each nominee of that year cost \$4,000, even Woody Woodpecker's. It would only be logical for the sponsor of Leo to pay the same amount.

I can't help but feel that this award is a bittersweet moment for the family of Leo Robin. It reminds me of the bittersweet duet that Leo wrote, "Thanks for the Memory," sung by Bob Hope and Shirley Ross in *The Big Broadcast of 1938* where they play a divorced couple reminiscing about their time together. It's unfortunate that the original sponsors -- my grandmother and Bob Hope -- are not here today to accept the honors and that generations of Leo's family who were here when the award was offered are no longer around -- my dear parents and Leo's wonderful four sisters and brother, all who adored him. This leaves the younger generations of Leo's family to attend -- his grandchildren and many nieces and nephews -- all who adored and idolized him.

We know you are the best at putting together a celebratory event and we look forward to proudly attending what we believe will be one of the most memorable ever on the Hollywood Walk of Fame.

Please find enclosed a check in the amount of \$4,000 payable to the Hollywood Historic Trust to honor the original commitment made by my grandmother and Bob Hope to sponsor the event. If you have any questions, please feel free to call me at (818) 618-2572.

Best wishes,


Scott D. Ora

Trustee of *Leo Robin Music*



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Mr. Scott Ora

SCOTT D. ORA

169
94-221/1212
3000

July 19, 2018
Date

Pay to the Order of Hollywood Historic Trust \$ 4,000.00
Four - Thousand dollars ^{00/100} Dollars
High Yield Investor Checking



Charles Schwab Bank
Reno, Nevada

For Sponsorship Fee

Scott D. Ora

MP

⑆121202211⑆ 440019514759⑈ 0169

Hardened Check

Exhibit 7

Walk of Fame Committee
c/o Ana Martinez, Hollywood Chamber of Commerce
6255 Sunset Boulevard, Suite 150
Hollywood, CA 90028

July 30, 2018

Dear Ms. Martinez,

I was taken aback by your letter this past week and your decision to return the check I made payable to the Hollywood Historic Trust in the amount of \$4,000. I was under the impression, after having spoken with you more than a year ago, that you planned to work with others in the Hollywood Chamber of Commerce to find a way, given the circumstances that prevented Leo Robin's sponsors from receiving notice, to reinstate the star that was awarded to him in 1990. For your convenience, I am providing you, in the attachments, a copy of your most recent letter to me along with all of my earlier letters to you and the Walk of Fame Committee.

After our conversation on July 6, 2017, I followed your instructions and wrote a letter addressed to the Walk of Fame Committee for you to share with them, explaining what had happened and requesting that the Committee reinstate the award to Leo. I then emailed you this letter along with the official records of my grandmother's passing. I thought that you were going to discuss the unique circumstances surrounding Leo's star with others on the Committee and get back to me but, despite my several inquiries, I didn't hear anything from you for a year.

When you finally replied, a couple of weeks ago, on July 10, 2018, you did not mention anything about discussions of Leo's star with the Committee. Instead, you wrote to me about the ceremony. In fact, I was waiting to hear what the Committee was going to do about Leo's long-neglected star. But I answered you promptly, anyway, to address your concerns.

I appreciated hearing back from you again, on July 17, 2018, and sent to you in an overnight envelope a letter with the date I selected for Leo's star ceremony, as you requested, with an enclosed check in the amount of \$4,000 as a sign of good faith to honor the commitment made by the sponsors in the original agreement. I felt like we were finally moving forward.

So, when I opened up your most recent letter to find my letter to you and the check inside, I felt like all of my efforts had been in vain. To think that, after all of this, you would ask me to wait yet another year to have the Committee consider reinstating the star to Leo at their next meeting in June 2019 is beyond the pale.

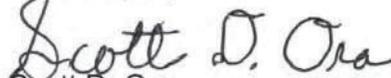
When, more than 30 years ago, Leo's sponsors, Mrs. Robin and Bob Hope, filled out an application to get Leo a posthumous star, they played by the rules. Following the instructions, they waited until 1988, 5 years after Leo's passing, just prior to the first year of eligibility, to submit the application. Sadly, Mrs. Robin did not live long enough to learn of Leo's nomination because she passed away on May 28, 1989. When the Committee sent out a letter, on June 18, 1990, to notify her of Leo's nomination, she had been deceased for more than a year. Unfortunately, no one else in my family was aware of the nomination, let alone the award.

It is my understanding that Bob Hope, who has 4 stars on the Hollywood Walk of Fame, did not have his address on the application nor was he notified. But the Chamber of Commerce must have had his address and/or phone number handy somewhere. When there was no reply from Mrs. Robin, someone somewhere should have done something. It is unfathomable to think that no one exercised due care. Given that there was no further notification to either sponsor, it would only be appropriate that Leo's star should cost the same amount as all the other stars awarded for the 1990-1991 year.

At this point, I can't help but feel that Leo Robin, his sponsors, his family and the 1990 Walk of Fame Committee, itself, have been treated unjustly. We are all enthralled by the mystery, romance and glamour that have always surrounded the Hollywood Walk of Fame and by honoring the decision of the 1990 Walk of Fame Committee to award Leo a star preserves its integrity.

In light of these above circumstances, I, as trustee of Leo Robin Music, make the same request that I made a little more than a year ago, on July 11, 2017, when I asked the Walk of Fame Committee to reinstate the much deserved and long-awaited star to Leo Robin. In addition, I request that the Committee allow us to honor the original commitment made by the sponsors for payment of the fee of \$4,000 and that all of this be considered by the Walk of Fame Committee as soon as possible.

Best wishes,


Scott D. Ora

Trustee of Leo Robin Music

cc: Leron Gubler

Exhibit 8

Ms. Donelle Dadigan
President and Founder
The Hollywood Museum
1660 N. Highland Ave.
Hollywood, California 90028

September 18, 2018

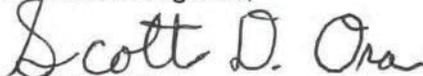
Dear Ms. Dadigan,

I love Hollywood and my family has been a part of it since its earliest beginnings so I was excited to learn about your museum and went to visit it online. When I came upon the Red Room with all of its glamorous Hollywood portraits, I was thrilled. I recognized many of them and then one jumped out at me -- one I knew well and loved dearly, who worked with many of these stars and was responsible for giving them some of their greatest material -- my grandfather, Leo Robin. He wrote songs like "Louise" for Maurice Chevalier, "Thanks for the Memory" for Bob Hope and "Diamonds Are a Girl's Best Friend" for Marilyn.

I am writing to you now to ask for your help. I recently learned, fortuitously, in July 2017, that Leo was awarded a posthumous star on the Hollywood Walk of Fame 28 years ago, back in 1990. I was stunned and immediately called the Hollywood Chamber of Commerce office to see if this were so and spoke to Ana Martinez there who confirmed this. She said nothing like this had ever happened before where the sponsor, in this case, my grandmother, did not live long enough to learn the results of an application. I was surprised that no one ever tried to reach Bob Hope who was the co-sponsor. Unlike the Oscar Leo won in 1938, no one in my family ever knew of this honor.

It is my hope, based on the original terms of the 1989 agreement, that you can help put Leo's long-lost star in its rightful place on the Hollywood Walk of Fame. I would welcome the opportunity to speak with you about this. You can reach me by phone at (818) 618-2572 or email me at sdo007@aol.com.

With warm regards,


Scott D. Ora

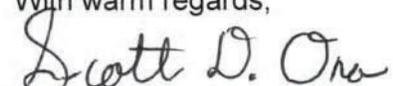
Ms. Donelle Dadigan
President and Founder
The Hollywood Museum
1660 N. Highland Ave.
Hollywood, California 90028

October 1, 2018

Dear Ms. Dadigan,

I am afraid you might not have received a letter I sent to you around two weeks ago. I am enclosing it here again and hope to hear back from you soon. You can reach me by phone at (818) 618-2572 or email me at sdo007@aol.com.

With warm regards,


Scott D. Ora

Ms. Donelle Dadigan
President and Founder
The Hollywood Museum
1660 N. Highland Ave.
Hollywood, California 90028

September 18, 2018

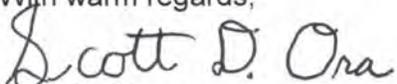
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I love Hollywood and my family has been a part of it since its earliest beginnings so I was excited to learn about your museum and went to visit it online. When I came upon the Red Room with all of its glamorous Hollywood portraits, I was thrilled. I recognized many of them and then one jumped out at me -- one I knew well and loved dearly, who worked with many of these stars and was responsible for giving them some of their greatest material -- my grandfather, Leo Robin. He wrote songs like "Louise" for Maurice Chevalier, "Thanks for the Memory" for Bob Hope and "Diamonds Are a Girl's Best Friend" for Marilyn.

I am writing to you now to ask for your help. I recently learned, fortuitously, in July 2017, that Leo was awarded a posthumous star on the Hollywood Walk of Fame 28 years ago, back in 1990. I was stunned and immediately called the Hollywood Chamber of Commerce office to see if this were so and spoke to Ana Martinez there who confirmed this. She said nothing like this had ever happened before where the sponsor, in this case, my grandmother, did not live long enough to learn the results of an application. I was surprised that no one ever tried to reach Bob Hope who was the co-sponsor. Unlike the Oscar Leo won in 1938, no one in my family ever knew of this honor.

It is my hope, based on the original terms of the 1989 agreement, that you can help put Leo's long-lost star in its rightful place on the Hollywood Walk of Fame. I would welcome the opportunity to speak with you about this. You can reach me by phone at (818) 618-2572 or email me at sdo007@aol.com.

With warm regards,


Scott D. Ora

Ms. Donelle Dadigan
President and Founder
The Hollywood Museum
1660 N. Highland Ave.
Hollywood, California 90028

November 7, 2018

Dear Ms. Dadigan,

I sent you a letter via FedEx twice but assume that you never received it since I haven't heard back from you. I am enclosing it once more so you will better understand the unprecedented circumstances surrounding the long-standing mistake made by the Hollywood Walk of Fame more than 28 years ago. Please remember that my grandmother who was the sponsor passed away before receiving notification and that the co-sponsor, Bob Hope, was never notified.

It is my hope that you, as Chair of the Board of the Hollywood Chamber of Commerce, will take the necessary steps to correct this mistake and award the great songwriter, Leo Robin, his long-overdue star.

You can reach me by phone at (818) 618-2572 or email me at sdo007@aol.com.

With warm regards,

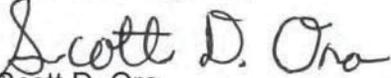
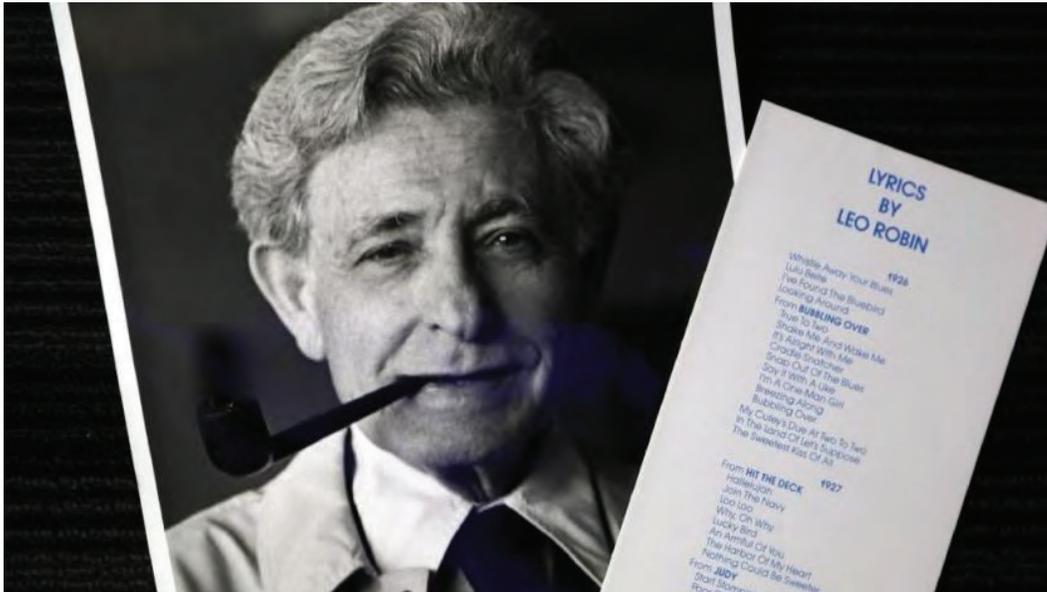

Scott D. Ora

Exhibit 9

Leo Robin never got his Walk of Fame star. Now his grandson is fighting for it



Materials from the original 1988 application for Leo Robin’s posthumous star, sent by his wife. She passed away weeks before learning that Robin had been awarded the star. Thirty years later, Robin’s grandson is attempting to get the star installed.

(Myung J. Chun / Los Angeles Times)

Scott Ora was 8 years old when he first visited the Hollywood Walk of Fame in 1965. After watching a matinee with his grandfather at Grauman’s Chinese Theatre, he and his brother ran outside onto the Hollywood Boulevard sidewalk and began to read off each name.

“Do you know who this is?” he repeatedly asked his grandfather, who couldn’t be stumped. It helped that he was asking the legendary Broadway and Hollywood lyricist Leo Robin, best known for the 1938 song [“Thanks for the Memory.”](#) At every coral terrazzo star they found, Robin shared an anecdote about the person, punctuating each story with the same compliment: “She is great.” ... “He is great.” Ora grew up knowing that his grandfather was also one of the greats. What he didn’t know is that years later he’d be tangled in a still-unresolved back-and-forth with the Walk of Fame to get it set in stone.

The song “Thanks for the Memory,” written for “The Big Broadcast of 1938,” the fourth and last in a series of Paramount Pictures variety-show movies, is a nuanced number, encompassing an estranged couple’s enduring love. Six writers had tried and failed at the assignment before director Mitchell Leisen gave it to in-house lyricist Robin and composer Ralph Rainger.

“I said, ‘It’ll never be a hit. It’s not a song, it’s a piece of material,’” [Robin told writer Max Wilk in 1971](#). But the Bob Hope-Shirley Ross duet went on to win the Academy Award for original song, and it became Hope’s signature tune. Now more than 80 years old, “Thanks for the Memory” has been covered by Frank Sinatra, Ella Fitzgerald, Bing Crosby, Sarah Vaughan, Anita O’Day, Rosemary Clooney, Harry Nilsson, Rod Stewart and many more.

Throughout his 30-year career in Hollywood — which spanned hits like “For Every Man There’s a Woman,” “In Love in Vain,” “June in January,” “Zing a Little Zong” and “Diamonds Are a Girl’s Best Friend” — Robin earned 10 Oscar nominations, and was inducted into the Songwriters Hall of Fame. The notoriously modest wordsmith often downplayed his accomplishments, attributing whatever success he happened to have to any of his collaborators. But others continue to sing praises for his work.

Audra McDonald sang Robin’s “Easy Living” when portraying Billie Holiday in
“Lady Day at Emerson’s Bar & Grill.”
(Michele K. Short / HBO)

Take “[Easy Living](#),” the jazz standard made famous by Billie Holiday. Audra McDonald performed the ballad in the 2014 Broadway play “[Lady Day at Emerson’s Bar & Grill](#),” which recounted the not-so-easy life of the singer, and noticed a new layer in the lyrics.

“It’s deceptive, in that it’s simple but very deep at the same time,” she told *The Times* recently. “The audience knows that song as being about someone in the glory of love, and that there’s no other reason to live except for that love. But on the other hand, if you don’t have that love, you have nothing to live for.”

Actress and singer Megan Hilty (“*Wicked*,” “*Smash*”) called Robin’s lyrics “so powerfully witty and clever.” She got to know his songs well when she starred in *City Center Encores!* 2012 production of “*Gentlemen Prefer Blondes*,” the 1949 Broadway show for which Robin wrote the lyrics to Jule Styne’s music.

Megan Hilty starred in City Center Encores! production of “Gentlemen Prefer Blondes” in 2012.

(Joan Marcus)

“People assume ‘Diamonds Are a Girl’s Best Friend’ is about a money-hungry woman, because that’s how it is in the film [with Marilyn Monroe](#),” she said. “But the [original stage version](#) makes it this power anthem for women of that time: Who you think is this stereotypical dumb blond is telling the audience about how she’s working a system and taking control.

“Lyricists are unsung heroes because for those of us who make a living by singing those lyrics, they’re everything,” she continued. “If you don’t connect to what the song is saying, it’s nothing, it’s hollow. We want to move people when we perform, and we can’t do that without brilliant lyrics.”

In 1989, nearly five years after his death, Robin was named as a recipient of a posthumous star on the Hollywood Walk of Fame. Thirty years later, the star has yet to be installed. To quote Robin’s Oscar-winning song, “And how are all those little dreams that never did come true?”

Scott Ora now has Leo Robin’s Oscar.

(Myung J. Chun / Los Angeles Times)

For many years, few in Robin’s family knew that a star was supposed to be placed for the lyricist on the Hollywood Walk of Fame. That includes Ora, who became Robin’s trustee in 2013 and inherited a few of his grandfather’s possessions. His gold dress watch and weathered leather band. His dark mahogany credenzas. The coffee table where his burning pipe rested regularly. And, of course, the Academy Award.

“Oscar and I are living the bachelor life,” Ora joked of the statuette to The Times. Afflicted with cauda equina syndrome, which affects the lower-back region, the 61-year-old public accountant keeps a reclusive routine in his Sherman Oaks apartment. Among his regular tasks is maintaining the [official Leo Robin website](#), requiring him to stay up to date on the genres his grandfather influenced.

One summer day in 2017, Ora googled Tito Puente, who had been newly [inducted into the Ertegun Jazz Hall of Fame](#), an entity he knew little about. After a few clicks, he not only learned that the Ertegun Jazz Hall of Fame was [launched in 2004](#) by Wynton Marsalis and Jazz at Lincoln Center, he discovered [a Puente biography on Google Books](#) which said the musician had been awarded a star on

the Hollywood Walk of Fame in the same year as Woody Woodpecker, Vivian Vance, Sam Cooke, Arsenio Hall, Robin Williams, B.B. King ... and Leo Robin.

“I was in disbelief,” Ora recalled. “I had to reread it a number of times, because I thought I knew everything major that there was to know about my grandfather.”

To double-check this — “because with the web, you can never trust things,” he said — Ora called the Hollywood Chamber of Commerce, which [first proposed the idea for the Walk of Fame in 1953](#). The effort has since transformed the city’s sidewalks into a coral-and-charcoal checkerboard, applauding achievements in five areas of the entertainment industry: film, television, music, theater and radio.

“It’s the only award that a celebrity can truly share with their fans,” Ana Martinez, the Chamber’s longtime vice president of media relations and Walk of Fame producer, told The Times. “The Oscar, the Tony, the Emmy, the Grammy, they’re all on someone’s mantle or wherever. But the star is for the public — they can touch it, sit next to it, even lay next to it. And if they can go to the ceremony, they’ve hit the jackpot.”

Leo Robin, top, Rita Hayworth and Ralph Rainger worked together on “My Gal Sal” in 1942.

(Scott Ora)

Martinez confirmed to Ora that, yes, Robin had indeed been awarded a posthumous star in the motion pictures category, as a lyricist of songs in over 50 films. It was never installed because no one responded to the award notification letter, which requests that an honoree set an induction ceremony date and pay a sponsorship fee. That crucial piece of correspondence is sent to nearly two dozen recipients each year in June, after the committee makes its final selections.

Robin’s wife, Cherie Redmond, who applied for her late husband’s star, never saw the letter that arrived on June 18, 1990; she had passed away on May 28, weeks before it was mailed. The envelope was returned to its sender and has since remained in the Chamber of Commerce’s records.

“I do think it was meant to be,” said Ora of discovering the star. “It’s important to me because it was important to my grandmother to pay tribute to Leo’s career in this way. And she took the time, she followed all the rules. My grandmother did everything right except live long enough.”

Leo Robin and wife Cherie Redmond at their wedding on Aug. 26, 1979.

(Scott Ora / Myung J. Chun / Los Angeles Times)

It's been decades since Robin was named to the Walk of Fame. Was it too late to get his name in a star? And if not, what would it take to get the star installed? Martinez explained that Robin would need to be reinstated by the current committee at the next annual meeting. She didn't anticipate problems with that part of the process. But there were two final steps that would need to be done by someone representing the estate: set an induction ceremony date and pay the sponsorship fee.

That fee? In 2017, when Ora first made his inquiries, was \$40,000 — 10 times what it was in 1989 when Robin was first approved for inclusion.

“I almost feel like we're talking about real estate,” said Ora. “If that's how this is done — and they're just going to, in my opinion, arbitrarily charge 40 [thousand dollars] — what do they have if the award is just based on money? If it's not based on merit, I think it loses some of its meaning.”

That \$40,000 actually covers a lot of ground, explained Martinez, who has spearheaded the [Walk of Fame proceedings](#) for over 30 years. The making and installation of the star, the indefinite maintenance of all the stars through the Hollywood Historic Trust, a replica plaque for the honoree. Then there's the ceremony's production costs, including city permits, security staff, barricades, rain tents, live-streaming capabilities and other equipment.

Throughout the Walk of Fame's history, this bill hasn't necessarily always been paid by individual recipients or their families, but film studios, television networks, record labels, foundations or other business entities. The induction ceremony has remained a notable publicity opportunity and ceremonies are often timed to coincide with the release of a star's latest film or TV show.

Ana Martinez, who produces the Walk of Fame, in the Hollywood Chamber of Commerce offices. “The Walk of Fame is my life,” she told *The Times*.

(Myung J. Chun / Los Angeles Times)

[STAR WALK: A guide to the thousands of stars on the Hollywood Walk of Fame »](#)

At one point, it was suggested that Robin's star be installed without the expensive fanfare, which would bring the cost closer to \$10,000. But Ora says he feels Robin deserves the usual ceremony — celebrating a star on the Walk of Fame is as much a part of the honor as the star itself. Since none of the lyricist's living

relatives were ever informed of the star when it was awarded 30 years ago, Ora believes the family should only be required to pay the 1989 fee of \$4,000.

"[The Hollywood Chamber of Commerce] are the ones that made this 30-year-old mistake, and I feel strongly that whoever makes a mistake should take responsibility," argued Ora, passionately pounding his fist on his desk to punctuate his point. "Why should we pay for a mistake that they made? I want them to acknowledge their mistake. They screwed up."

A mistake it was not, noted Martinez to The Times. Back in 1989, before the ease of email and cellphones, honorees were not as repeatedly and actively pursued to secure their star as they are today. That means no follow-up letters and no calls to co-signers, even if Robin's application was co-signed by Hope, who has four stars on the Walk.

In fact, a number of Walk of Fame stars awarded posthumously (Whitney Houston, Neil Simon, Tupac Shakur) or otherwise (George Clooney, Clint Eastwood, Al Pacino) have also not been installed. If any of these previously announced accolades were to be installed today, they would be executed at the current cost.

For honorees inducted in 2020 ([applications for which are due on May 31](#)), the sponsorship fee has risen to \$50,000. Even so, Martinez told The Times, "We would keep it at the \$40,000 for [Ora], because we've had that discussion. We're not gonna raise it, we would never do that to him."

Still, Ora has made up his mind about how much Robin's star should cost. Last year, he brazenly sent a \$4,000 check to the Chamber of Commerce to move things along. Martinez immediately returned it; the Walk of Fame has never self-funded or subsidized the cost of a star.

"I feel bad, I do," lamented Martinez of Robin's uninstalled star. "The man deserves it. It should've happened in 1990, but of course, sad circumstances happened. The fact that [Ora] wants us to place the star and do the ceremony, we just can't do it. We want to work with him, but he's gotta work with us."

Leo Robin won an Oscar in 1939 for lyrics of the best song for "Thanks for the
Memory."

(Myung J. Chun / Los Angeles Times)

What began for Ora as a serendipitous discovery has evolved into an impassioned mission, one that's stuck at a \$36,000 impasse — and one that, Martinez offered,

can be moved if Ora were to pursue corporate sponsors or crowdfunding.

“I don’t like it,” said Ora, strongly shaking his head at these suggestions, especially the idea of launching a GoFundMe campaign. “I can already hear people in my family saying, ‘Scott, are you crazy?’ but if I had that money, I’d say, ‘Let’s give it to children. Let’s give it to a worthy cause.’ If I’m not willing to pay for the star, why would I ask other people to pay for it? It just seems very inappropriate.”

Yet if his grandfather’s star is ever to see the light of day, Ora hopes it might somehow snag a spot in front of the Roosevelt Hotel, where Robin first stayed when he arrived in 1928 as an up-and-coming lyricist. It was there where he and composer Dick Whiting wrote “Louise,” the tune sung by Maurice Chevalier in 1929’s “Innocents of Paris” with the famous line “Every little breeze seems to whisper ‘Louise.’”

How lovely that would’ve been. “That’s prime real estate,” said Martinez. “It’s a major landmark, and we already doubled up the rows on those sidewalks. There are no spots left.”

Ora’s ideal spot for Robin’s star would have been in front of the Roosevelt Hotel, where Robin first stayed when he began his Hollywood career.

(Myung J. Chun / Los Angeles Times)

ashley.lee@latimes.com

Twitter: [@cashleelee](https://twitter.com/cashleelee)

Exhibit 10

■■■ ELECTION 2020 ■■■

A TIMES INVESTIGATION

Abortion debate jumps into spotlight

Strict new laws have energized women and given them more sway in Democratic race.

By JANET HOOK

WASHINGTON — After Alabama's governor signed a near-total ban on abortion into law last week, a surge of women interested in running for office contacted Emily's List, a women's political group. The Virginia Democratic Party saw a surge in contributions. VoteRunLead, a group that trains female candidates, saw enrollment for an upcoming weekend course abruptly almost double.

With abortion policy returning to the center of national attention, women are back in the spotlight as a central force in Democratic politics. The party's 2020 presidential candidates have responded quickly, scrambling to promote abortion rights policies in campaigns that had mostly been giving priority to economic issues.

Women — as candidates,

voters and activists — were a pivotal element of Democrats' success in the 2018 midterm election. Their energy has been diffused in the enormous field of Democratic presidential candidates. But now many Democratic women are joining together for the abortion fight that has emerged in recent weeks.

"We're seeing another surge of an already pretty engaged universe of women," said Stephanie Schriock, president of Emily's List, which she noted was contacted by 76 women in a single day amid debate over the Alabama law. "It's changing the positioning of the Democratic Party."

Her group joined a coalition of activists to stage demonstrations across the country last week to protest a spate of restrictive abortion laws passed by Alabama, Georgia, Missouri and other states.

The intensifying abortion debate also carries political risks for Democrats. Republicans have stepped up their efforts to portray abortion rights advocates as extremists. Reacting to [See Abortion, A18]



MARY ALTAFFER Associated Press
ABORTION RIGHTS supporters across the country have been protesting recent state-level restrictions.



GARY CORONADO Los Angeles Times
CASA LIBRE, or Freedom House, in Los Angeles has been cited by officials 143 times for failing to meet standards for state-licensed group homes, a Times investigation has found.

SIGNS OF NEGLECT

At the Casa Libre youth shelter operated by a longtime L.A. immigrant-rights champion, health and safety concerns have persisted despite repeated state citations

By Cindy Careamo and Paloma Esquivel

Los Angeles lawyer Peter Schey has long been a trailblazing courtroom defender of immigrant youth.

He helped argue the Supreme Court case that ensured the right of children without legal status to attend public schools. He also helped secure the Flores settlement — a landmark 1997 agreement to safeguard migrant children held by the government, which gave his legal foundation the right to inspect those shelters.

That case also inspired him to run his own shelter for homeless migrant youths. Schey opened Casa Libre, or Freedom House, in late 2002 in a historic mansion near MacArthur Park, saying it would care for "the most vulnerable" children.

But Casa Libre has been cited by state officials 143 times for failing to meet standards for state-licensed group homes, and 89 of those were for issues that posed "an immediate risk to the health, safety or per-

sonal rights of residents," a Times investigation found.

Interviews with more than two dozen former employees and residents and a review of hundreds of documents — including 15 years' worth of state inspection reports — show a pattern of neglect that has persisted despite efforts by workers and residents to inform Schey and the board of directors about problems at the home.

Children have been locked out of the home for hours because there was no staff on-site, forcing some to take shelter outside in a broken-down van. And at times, there has not been enough food, former residents said.

There was violence among the residents and break-ins, according to former residents and workers. The basement frequently flooded. And the roof often leaked, according to former [See Casa Libre, A8]



Los Angeles Times
PETER SCHEY

Admissions scammer may have faked his resume too

By MATTHEW ORMSETH AND JOEL RUBIN

William "Rick" Singer was well into orchestrating an elaborate bribery and cheating scheme to slip his clients' children into elite colleges when he sat down for a deposition in Washington, D.C., in 2016.

Asked why he should be considered an expert in the field of college admissions, Singer outlined his credentials: He had worked on admissions committees for UCLA, UC Davis, the University of Miami and other colleges, helping to decide

which students should be offered spots.

He claimed to know what colleges did and did not want in an applicant. Parents sought him out, Singer said, because they "want to have an edge and have an expert that understands both sides of the equation," according to a transcript of the proceeding obtained by The Times.

But the claim appears to be dubious. All but one of the schools Singer named in the deposition denied that he ever played a role in advising whom to admit and whom to turn away.

The episode offers a win-

dow into how Singer sold himself as an authority, a self-described "master coach" who could steer his clients' children through the narrow corridors of the application process.

Sitting in a law office that October morning, Singer was still two years from being nabbed as the mastermind of what authorities have called the largest college admissions scam ever uncovered by U.S. law enforcement.

Instead he was flying high among the rich and influential in Silicon Valley, Hollywood and other circles. [See Singer, A12]

Losing a rat race

Rodents plague downtown, and blame is easily shared, Steve Lopez writes. **CALIFORNIA, B1**

A dead end for some Lyft drivers

The costs and terms of the firm's car rentals are leaving workers in dire straits. **BUSINESS, C1**

Weather **B10**

Printed with soy inks on partially recycled paper.



VALERY HACHE AFP/Getty Images
South Korean film wins Cannes
 "Parasite," by director Bong Joon-ho, right, wins top prize, and Mati Diop's "Atlantics" is runner-up. **A6**



NABIH BULOS Los Angeles Times
FIGHTERS LOYAL to Libya's interim government load heavy guns in Tripoli, where many weary residents have become inured to the sounds of combat.

Kebabs, gelato and bombs

In Tripoli, many ignore war and get on with life

By NABIH BULOS

TRIPOLI, Libya — It's Ramadan in Tripoli, and come midnight the streets around the Kabir public garden are a melee of bumper-to-bumper traffic. In the park, families hold post-fasting picnics, as teenagers roam in energetic clumps amid a panoply of kebab stands, gelato trucks and inflatable bounce houses.

Occasionally, a loud thud overpowers the dance-beat thumping from speakers ("That's a Grad rocket," says one passerby, cocking a discerning ear to the sky); it's one of the few signs in downtown Tripoli that the enemy is at the gates.

That enemy, in the eyes of many here, is renegade Gen. Khalifa Haftar, who seeks to rule Libya via his self-declared Libyan National Army.

For years, the aspiring strongman (not to mention naturalized U.S. citizen and former CIA asset) has vowed to conquer Tripoli, a city of more than 1 million people and the seat of the United Nations-recognized — though largely powerless — Government of National Accord, or GNA.

A deal reached in February with the GNA's head, Prime Minister Fayez Serraj, would have installed Haftar as chief of staff of a reconstituted Libyan army after the selection of a new government later this year.

Instead, with Libya's east and south already in his hands, Haftar, who once worked for longtime dictator Col. Moammar Kadhafi and currently is allied to a rival government in eastern Libya, sought to claim the capital and consolidate power over the oil-rich North African country. [See Libya, A4]

ARTS&BOOKS

SUNDAY, MAY 26, 2019 :: LATIMES.COM/CALENDAR



MYUNG J. CHUN Los Angeles Times

"I FELT LIKE that was my time to really show them that I've got this West Coast on lock," YG says of a slot at Coachella.

POWERFUL L.A. VOICE

YG honors a fallen friend while advancing West Coast rap

By RANDALL ROBERTS >>> During the last week of March, Compton-born rapper YG was nodding along to a new track called "In the Dark" in front of a mixing board at Encore Studios in Burbank. ¶ The 29-year-old listened as part of a split TV screen on the wall above him displayed security camera footage from the building's perimeter. ¶ "Think twice before attacking me," he raps on the track, the most menacing on YG's new album, "4Real 4Real." "I'm-a pull a gun out, I ain't gonna run, I ain't no athlete." ¶ Over the last decade, YG, born Keenon Jackson, has been shot on two occasions — once while leaving a recording studio. "We gotta be behind gates now, private locations," he said at the studio. ¶ Little did he know. Three days later, Nipsey Hussle, one of YG's best friends and self-described brother from another color, would be ambushed and killed outside his own shop. ¶ Despite YG identifying as a red-wearing Blood and Hussle as a Crip outfitted in blue, the two had been through a lot together, most famously via a letter to his label from the Secret Service after the release of "F.D.T.," their expletive-driven 2016 collaborative indictment of then-candidate Donald Trump. When Hussle earned a rap album Grammy nomination in 2018, YG said he couldn't have been more [See YG, F4]

A Walk of Fame star still in limbo

The late lyricist behind Bob Hope's theme song was a victim of bad timing, but 'Memory' still irks kin.

BY ASHLEY LEE

Scott Ora was 8 years old when he first visited the Hollywood Walk of Fame in 1965. After watching a matinee with his grandfather at Grauman's Chinese Theatre, he and his brother ran outside onto the Hollywood Boulevard sidewalk and began to read off each name.

"Do you know who this is?" he repeatedly asked his grandfather, who couldn't be stumped. It helped that he was asking the legendary Broadway and Hollywood lyricist Leo Robin, known for the 1938 song "Thanks for the Memory." At every coral terrazzo star they found, Robin shared an anecdote about the person, punctuating each story with the same compliment: "She is great." — "He is great." Ora grew up knowing that his grandfather was also one of the greats. What he didn't know is that years later he'd be tangled in a still-unresolved back-and-forth with the Walk of Fame to get it set in stone.

The song "Thanks for the Memory," written for "The Big Broadcast of 1938," the last in a series of Paramount Pictures variety-show movies, is a nuanced number, encompassing an estranged couple's enduring love. Six writers had tried and failed at the assignment before director Mitchell Leisen gave it to in-house lyricist Robin and composer Ralph Rainger.

"I said, 'It'll never be a hit. It's not a song.' [See Star, F5]



GREG GORMAN

JOHN WATERS' latest book is titled "Mr. Know-It-All."

BOOK REVIEW

Life, as reflected by Waters

BY HENRY ROLLINS

John Waters' new collection of essays, "Mr. Know-It-All: The Tarnished Wisdom Of A Filth Elder," explores the edgy filmmaker's many decades of experience in the business, brushes with mainstream acceptance, and life as an aging counterculture celebrity. As Waters writes: "Aging gracefully is the toughest thing for a rebel."

"Mr. Know-It-All" is like life itself: at times fascinating, hilarious and outrageous as well as tedious, gross and obnoxious — exactly all the reasons why you show up for anything Mr. Waters has done in the first place.

I've been a fan of Waters for many years. I've visited with him, interviewed him and have always been impressed with his friendliness, quick wit, curiosity and honesty. I've kept every Christmas card he sent me as well as the tree ornament, a clear bulb with a plastic roach in it. "Happy holidays from John Waters."

Waters spends a lot of time on airplanes. He insists on first class now after so many years of circling the globe on promotion duty in coach. Waters has earned it; he also keeps a [See Waters, F6]

Star issue irks lyricist's kin

[Star, from F1] it's a piece of material," Robin told writer Max Wilk in 1971. But the Bob Hope-Shirley Ross duet went on to win the Academy Award for original song, and it became Hope's signature tune. Now more than 60 years old, "Thanks for the Memory" has been covered by Frank Sinatra, Ella Fitzgerald, Bing Crosby, Sarah Vaughan, Anita O'Day, Rosemary Clooney, Harry Nilsson, Rod Stewart and more.

Throughout his 30-year Hollywood career — with hits like "For Every Man There's a Woman," "In Love in Vain," "June in January," "Zing a Little Zong" and "Diamonds Are a Girl's Best Friend" — Robin earned 10 Oscar nominations and was inducted into the Songwriters Hall of Fame. The notoriously modest wordsmith often downplayed his accomplishments, attributing his success to have to his collaborators. But others continue to sing praises for his work.

Take "Easy Living," the jazz standard made famous by Billie Holiday. Audra McDonald performed the ballad in the 2014 Broadway play "Lady Day at Emerson's Bar & Grill," and noticed a new layer in the lyrics.

"It's deceptive. It's simple but very deep at the same time," she told *The Times* recently. "The audience knows that song as being about someone in the glory of love and that there's no other reason to live except for that love. But on the other hand, if you don't have that love, you have nothing to live for."

Megan Hilty ("Wicked," "Smash") called Robin's lyrics "so powerfully witty and clever." She got to know his songs well when she starred in City Center Encores! 2012 production of "Gentlemen Prefer Blondes," the #49 Broadway show for which Robin wrote the lyrics to Jule Styne's music.

"People assume 'Diamonds Are a Girl's Best Friend' is about a money-hungry woman, because that's how it is in the film with Marilyn Monroe," she said. "But the original stage version makes it this power anthem for women of that time. Who you think is this stereotypical dumb blond is telling the audience about how she's working a system and taking control."

"Lyricists are unsung heroes because for those of us who make a living by singing those lyrics, they're everything. If you don't connect to what the song is saying, it's nothing, it's hollow."

In 1989, nearly five years after his death, Robin was named as a recipient of a posthumous star on the Hollywood Walk of Fame. Thirty years later, the star has yet to be installed. To quote Robin's Oscar-winning song, "And how are all those little dreams that never did come true?"

For many years, few in Robin's family knew that a star was supposed to be placed for the lyricist. That includes Ora, who became Robin's trustee in 2003 and inherited a few of his grandfather's possessions. His gold dress watch and weathered leather band. His dark mahogany credenzas. The coffee table where his burning pipe rested. And the Academy Award.

"Oscar and I are living the bachelor life," Ora joked of the statuette to *The Times*. Afflicted with cauda equina syndrome, which affects the lower-back region, the 61-year-old public accountant keeps a reclusive routine in his Sherman Oaks apartment. Among his regular tasks is maintaining the official Leo Robin website, requiring him to stay up to date on the genres his grandfather influenced.

One day in 2007, Ora googled Tito Puente, who had been newly inducted into the Ertegun Jazz Hall of Fame, an entity he knew little about. After a few clicks, he not only learned that the Ertegun Jazz Hall of Fame was launched in 2004 by Wynton Marsalis and Jazz at Lincoln Center, he discovered Puente had been awarded a star on the Hollywood Walk of Fame in the same year as Woody Woodpecker, Vivian Vance, Sam Cooke, Arsenio Hall, Robin Williams, B.B. King ... and Leo Robin.

"I was in disbelief," Ora recalled. "I had to reread it a number of times, because I thought I knew everything major that there was to know about my grandfather's work." To double-check this — "because with the web, you can never trust things," he said — Ora called the Hollywood Chamber of Commerce, which first proposed the idea for the Walk of Fame in 1953. The effort has since transformed the city's sidewalks into a coral-and-charcoal checkerboard, applauding achievements in five areas of the entertainment industry: film, television, music, theater and radio.

"It's the only award that a celebrity can truly share with their fans," Ana Martinez, the chamber's longtime vice president of media relations and Walk of Fame producer, told *The Times*. "The Oscar, the Tony, the Emmy, the Grammy, they're all on someone's mantle or wherever. But the star is for the public — they can touch it, sit next to it, even lay next to it. And if they can go to the ceremony, they've hit the jackpot."

Martinez confirmed to Ora that, yes, Robin had indeed been awarded a posthumous star in the



From Scott Ora

LEO ROBIN, top, with Rita Hayworth and his songwriting partner Ralph Rainger work on "My Gal Sal" at Paramount in 1942.



Paramount Pictures



From Scott Ora



MERRICK J. CHURCH/Los Angeles Times

BOB HOPE and Shirley Ross, top left, sang "Thanks for the Memory" in the film "The Big Broadcast of 1938," with lyrics from Robin, above circa 1934. The song would go on to be Hope's theme. Above, Robin's grandson Scott Ora with lyricist's Oscar for the song.

motion pictures category, as a lyricist of songs in more than 50 films. It was never installed because no one responded to the award notification letter, which requests that an honoree set an induction ceremony date and pay a sponsorship fee. That crucial piece of correspondence is sent to nearly two dozen recipients each year in June, after the committee makes its final selections.

Robin's wife, Cherie Redmond, who applied for her late husband's star, never saw the letter that arrived on June 8, 1990, she had died on May 28. The envelope was returned to its sender and has since remained in the Chamber of Commerce's records.

"I do think it was meant to be," said Ora of discovering the star. "It's important to me because it was important to my grandmother to pay tribute to Leo's career in this way. And she took the time, she followed all the rules. My grandmother did everything right except live long enough."

It's been decades since Robin was named to the Walk of Fame. Was it too late to get his name in a star? And if not, what would it take to get the star installed? Martinez explained that Robin would need to be reinstated by the current committee at the next annual meeting. She didn't anticipate problems with that part of the process. But there were two final steps that would need to be done by someone representing the estate: set an induction ceremony date and pay the sponsorship fee.

That fee? In 2017, when Ora made his inquiries, was \$40,000 — 10 times what it was in 1989 when Robin was approved for inclusion.

"I almost feel like we're talking

about real estate," said Ora. "If that's how this is done — and they're just going to, in my opinion, arbitrarily charge 40 [thousand dollars] — what do they have if the award is just based on money? If it's not based on merit, I think it loses some of its meaning."

That \$40,000 actually covers a lot of ground, explained Martinez, who has spearheaded the Walk of Fame proceedings for more than 30 years. The making and installation of the star, the indefinite maintenance of all the stars through the Hollywood Historic Trust, a replica plaque for the honoree. Then there's the ceremony's production costs, including city permits, security staff, barricades, rain tents, live-streaming capabilities and other equipment.

Throughout the Walk of Fame's history, this bill hasn't necessarily always been paid by individual recipients or their families but film studios, television networks, record labels, foundations or other business entities. The induction ceremony has remained a notable publicity opportunity, and ceremonies are often timed to coincide with the release of a star's latest film or TV show.

At one point, it was suggested that Robin's star be installed without the expensive fanfare, which would bring the cost closer to \$10,000. But Ora says he feels Robin deserves the usual ceremony — celebrating a star on the Walk of Fame is as much a part of the honor as the star itself. Since none of the lyricist's living relatives were ever informed of the star when it was awarded 30 years ago, Ora believes the family should be required to pay only the 1989 fee of \$4,000.

"[The Hollywood Chamber of

Commerce] are the ones that made this 30-year-old mistake, and I feel strongly that whoever makes a mistake should take responsibility," argued Ora, pounding his fist on his desk to punctuate his point. "Why should we pay for a mistake that they made? I want them to acknowledge their mistake. They screwed up."

A mistake it was not, noted Martinez to *The Times*. Back in 1989, before the ease of email and cellphones, honorees were not as repeatedly and actively pursued to secure their star as they are today. That means no follow-up letters and no calls to co-signers, even if Robin's application was co-signed by Hope, who has four stars on the Walk.

In fact, a number of Walk of Fame stars awarded posthumously (Whitney Houston, Neil Simon, Tupac Shakur) or otherwise (George Clooney, Clint Eastwood, Al Pacino) have also not been installed. If any of these previously announced accolades were to be installed today, they would be executed at the current cost.

For honorees inducted in 2020 (applications for which are due on May 31), the sponsorship fee has risen to \$50,000. Even so, Martinez told *The Times*, "We would keep it at the \$40,000 for [Ora], because we've had that discussion. We're not gonna raise it, we would never do that to him."

Still, Ora has made up his mind about how much Robin's star should cost. Last year, he brazenly sent a \$4,000 check to the Chamber of Commerce to move things along. Martinez immediately returned it; the Walk of Fame has never self-funded or subsidized the cost of a star.

"I feel bad, I do," lamented Martinez of Robin's uninstalled star. "The man deserves it. It should've happened in 1990, but of course, sad circumstances happened. The fact that [Ora] wants us to place the star and do the ceremony, we just can't do it. We want to work with him, but he's gotta work with us."

What began for Ora as a serendipitous discovery has evolved into an impassioned mission, one that's stuck at a \$36,000 impasse — and one that, Martinez offered, can be moved if Ora were to pursue corporate sponsors or crowdfunding.

"I don't like it," said Ora, strongly shaking his head at these suggestions, especially the idea of launching a GoFundMe campaign. "I can already hear people in my family saying, 'Scott, are you crazy?' but if I had that money, I'd say, 'Let's give it to children. Let's give it to a worthy cause. If I'm not willing to pay for the star, why would I ask other people to pay for it?' It just seems very inappropriate."

Yet if his grandfather's star is ever to see the light of day, Ora hopes it might somehow snag a spot in front of the Roosevelt Hotel, where Robin first stayed when he arrived in 1928 as an up-and-coming lyricist. It was there where he and composer Dick Whiting wrote "Louise," the tune sung by Maurice Chevalier in 1929's "Innocents of Paris" with the famous line "Every little breeze seems to whisper-Louise."

How lovely that would've been. "That's the prime real estate," said Martinez. "It's a major landmark, and we already doubled up the rows on those sidewalks. There are no spots left."

Exhibit 11

Leo Robin Music is Indignant over the Hollywood Walk of Fame's Decision to not Install Leo's Long-Lost Star ("[#LeosLostStar](#)") Awarded to the "Thanks for the Memory" Oscar-Winning Lyricist 29 Years Ago

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SHERMAN OAKS, CA / ACCESSWIRE / June 26, 2019 / Leo Robin Music is indignant over the Hollywood Walk of Fame's decision at their annual meeting and subsequent announcement last week to not install the star that was awarded to lyricist, Leo Robin, 29 years ago. Ashley Lee from the Los Angeles Times first broke on May 23, 2019 this fascinating story, *Leo Robin never got his Walk of Fame star. Now his grandson is fighting for it*, about his grandson's, Scott Ora's, serendipitous discovery of Leo's long-lost star which he believes got lost because "[The Hollywood Chamber of Commerce]...made this 30-year-old mistake." Leo Robin's wife, Cherie Robin, and actor, Bob Hope, sponsored Leo for a star in 1988 but, sadly, Mrs. Robin passed away slightly more than one year before the letter was sent out from the Chamber announcing that her

husband had been awarded the star and so, unfortunately, it was never installed.



[View photos](#)



In the wake of the release of this story by The Times, Leo Robin Music is outraged to learn what happened 29 years ago. Ms. Lee reported, "The envelope was returned to its sender and has since remained in the Chamber of Commerce's records" and also tweeted, "at first I didn't believe that Leo Robin's star had really slipped through the cracks" with a photo of that acceptance letter and the envelope stamped "RETURN TO SENDER." Ms. Lee explained the Chamber's view, "A mistake it was not, noted (Ana) Martinez [Producer of the Walk Of Fame] to The Times. Back in 1989, before the ease of email and cell phones, honorees were not as repeatedly and actively pursued to secure their star as they are today. That means no follow-up letters and no calls to co-signers, even if Robin's application was co-signed by (Bob) Hope, who has four stars on the Walk."

The Chamber should live, love and learn the lyrics of the Elvis Presley 1962 hit "Return to Sender," a song about a man sending a letter by post to his girlfriend after an argument. She continually writes "Return to Sender" and he keeps mailing letters including "sent it

special D" and "This time I'm gonna take it myself and put it right in her hand." Elvis, who recorded "Blue Hawaii," a classic written by Leo Robin and Ralph Rainger, for his film of the same name and the soundtrack of which stayed at #1 on the album chart for twenty consecutive weeks, would be rock 'n' rolling in his... and singing "Suspicious Minds" upon learning that the Chamber only sent it once with no follow-up letter or call to co-sponsor, Bob Hope. No matter when or where -- whether it be 1962 when Elvis sang about it or 1990 when the Chamber obstructed delivery of the letter or even today -- it has always been true when a letter has been "Return to Sender," the sender will verify the address and resend it. What the Chamber did after the letter was "Return to Sender" was not customary practice but smacks of disregard for the individuals honored by the Walk of Fame Committee.

Leo Robin Music would like to take this opportunity to express its gratitude for the outpouring of sympathy for Robin to get his star installed on the Hollywood Walk of Fame. The public also supports Mr. Ora's position in a disagreement over the price of the star. Mr. Ora believes it should be the original price of \$4,000, the fee back in 1990 when Robin was awarded the star, meanwhile, the Chamber believes it should be the current price of \$40,000. In a poll conducted by Ms. Lee on Twitter, she asked, "how much do you think Ora should pay for his grandfather's star?" and the public overwhelmingly supported the original price with these landslide results: "90% (voted in favor of) \$4,000 as priced in 1989" while only "10% (voted for) \$40,000 as priced in 2017." This blowout poll with a huge margin (90% to 10%) shows the Hollywood Walk of Fame's stance is clearly out of step with the mainstream just like the Chamber was back in 1990 when it hindered delivery of the acceptance letter.

When Robin's grandson called the Chamber and spoke to Ms. Martinez on July 6, 2017, almost two years ago, he told her about his discovery of Leo's long-lost star. She confirmed it was true and said, "Nothing like this has ever happened before." Throughout the past sixty years, the Chamber has successfully kept track of 2,665

honorees and has seen to it that each and every one of them received a star and had it successfully installed on the Hollywood Walk of Fame with their name on it -- except for Leo. At this point, one can't help but conclude that Robin, his sponsors, his family and the 1990 Walk of Fame Committee, itself, have been treated unjustly by the Chamber. We are all enthralled by the mystery, romance and glamour that have always surrounded the Hollywood Walk of Fame and it is high time for the Chamber to preserve its integrity and honor the decision of the Walk of Fame Committee and put Leo's long-lost star in its rightful place on the Hollywood Walk of Fame!

To see the online version of the article, *Leo Robin never got his Walk of Fame star. Now his grandson is fighting for it* by Ashley Lee released on May 23, 2019 on the website of the Los Angeles Times, please go to: <https://www.latimes.com/entertainment/la-et-ms-leo-robin-star-walk-of-fame-20190523-story.html>.

To see the print edition of this story, *A Walk of Fame star still in limbo : The late lyricist behind Bob Hope's theme song was a victim of bad timing, but 'Memory' still irks kin.* by Ashley Lee issued on May 26, 2019 in the Sunday print edition of the Los Angeles Times, please see the attached PDF file.

For more information, visit the official website of Leo Robin at <http://leorobin.com/>.

About Leo Robin Music

Leo Robin Music owns the copyrights of songs written by Leo Robin, who was known as the "Dean of Lyric Writers." He created lyrics that have inspired popular music and become part of the fabric of our culture. Considered to be one of the most influential songwriters of the 20th Century, he wrote many of the country's most popular jazz standards including "Blue Hawaii," "Diamonds Are a Girl's Best Friend," "Easy Living," "If I Should Lose You," "My Ideal," "Prisoner of Love" and "Thanks for the Memory."

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SOURCE: Leo Robin Music

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View photos



Exhibit 12

Thanks for the Memory: How Leo Robin Helped Usher In the Golden Age of Song in Film

"Diamonds Are a Girl's Best Friend" and "Blue Hawaii" are among his songwriting credits.

By [ROY TRAKIN](#)



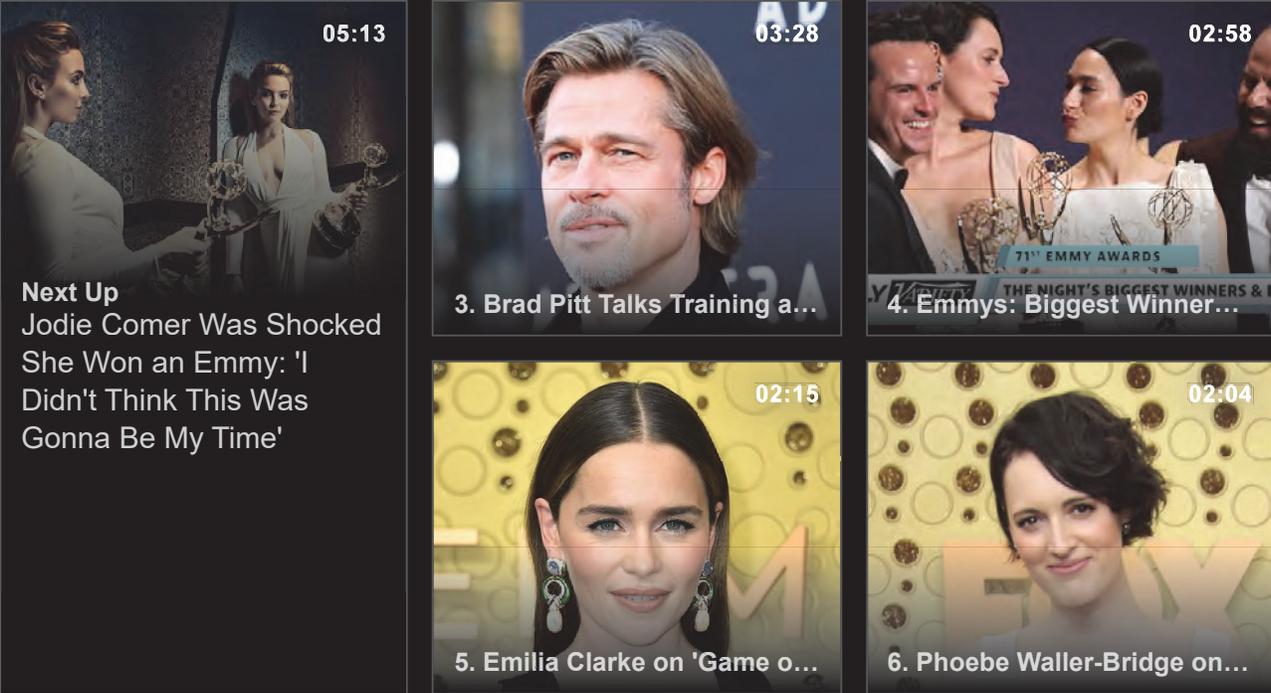
CREDIT: SNAP/SHUTTERSTOCK

The centerpiece of Scott Ora's cluttered San Fernando Valley apartment is the 1939 Oscar his step-grandfather, the late lyricist [Leo Robin](#), was presented for co-writing "Thanks for the Memory." Sung by [Bob Hope](#) and Shirley Ross in the film "The Big Broadcast of 1938," the trophy sits proudly on the piano where Robin worked on some of his biggest hits. The movie marked the comedian's breakout role and Leo's tune, co-written with frequent collaborator Ralph Rainger, soon became Hope's theme song. It was Robin's only Academy Award win out of a total of 10 nominations.

Over the course of 20 years, from 1934 (when the best original song category was introduced and he was nominated for "Love in Bloom") through 1954, Robin, a member of the Songwriters Hall of Fame who died in 1984 at the age of 84, earned 10 Oscar nominations (two in 1949 alone). His impressive catalog includes signature tunes for Maurice Chevalier ("Louise"), Jeanette McDonald ("Beyond the Blue Horizon"), Bing Crosby ("Please," "Zing a Little Zong"), Dorothy Lamour ("Moonlight and Shadows"), Jack Benny ("Love in Bloom"), Eddie Fisher ("One Hour With You"), Carmen Miranda ("Lady in the Tutti Frutti Hat") and [Marilyn Monroe](#) ("Diamonds Are a Girl's Best Friend"). His

songs have been covered by Bing Crosby and Elvis Presley (“Blue Hawaii”), Perry Como, James Brown and Billy Eckstine (“Prisoner of Love”) as well as Frank Sinatra (“For Every Man There’s a Woman,” “Thanks for the Memory”). “My Ideal,” originally sung by Maurice Chevalier in the 1930 film, “Playboy of Paris,” is now a jazz standard with interpretations by Margaret Whiting, Chet Baker, Thelonious Monk, Coleman Hawkins, Art Tatum, Dinah Washington, Sarah Vaughn and Tony Bennett, while “Easy Living” because a regular in the sets of Billie Holiday and Ella Fitzgerald.

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Although the release of “The Jazz Singer” in 1927 is generally regarded as the first sound motion picture – featuring a black-faced Al Jolson crooning “Mammy” — Hollywood began cranking out all-singing, all-talking Technicolor films like Warner Bros.’ operetta “The Desert Song” and “On With the Show,” in 1929, making the intersection of motion picture sound and song 90 years old.

Interest in the era has ebbed and flowed, but seems on the upswing again as Oscar-winning director Damien Chazelle recently announced his next project, “Babylon,” will take place in that golden era when silent movies became talkies.

By the mid-’20s, Leo Robin, a Pittsburgh native whose father Max was an insurance agent and amateur poet, graduated from both law school and studying theater at Carnegie Tech, followed by stints as a cub reporter writing a love advice column, a publicist, a social worker and a copywriter for a steel mill. Bit by the show biz bug, Leo moved to New York with ambitions to become a playwright or actor, embracing the “bohemian life” in Greenwich Village.

An introduction by one of his Carnegie professors to fellow Steel City native and noted Broadway director George S. Kaufman steered Leo into becoming a lyricist after reading his poems and convincing him to write lyrics. He first had to explain the concept to the fledgling songwriter. George and Ira Gershwin then introduced Leo to music publisher Max Dreyfus, who had Leo working on eight Broadway shows in the course of two years from 1926 to 1928, breaking out with “Hallelujah!” from the smash musical “Hit the Deck,” which went on to be covered by a number of jazz artists, including Fats Waller.

In 1928, Robin was recruited by Hollywood as a certified “hit-maker” at the dawn of the sound era, hired by Paramount Pictures, and paired with Richard Whiting (Margaret’s father) for the studio’s first musical, “Innocents of Paris,” released in 1929, which also marked the American debut for French crooner Maurice Chevalier. The dapper

entertainer's U.S. career was launched with what would be his signature song, "Louise," featuring those memorable Leo Robin lyrics... "Every little breeze seems to whisper Louise."



“He wrote the song after he was given the name of the character,” says Ora, a Certified Public Accountant who is the trustee for his grandfather’s estate. “Ernst Lubitsch worked with Leo because he liked that he didn’t turn his characters into performers. He tailored the lyrics to the scripts, and it’s amazing the songs became so well-known afterwards on their own.”

As for Oscar winner “Thanks for the Memory,” Ora recalls Leo thinking it was “just material,” another forgettable movie song, though it turned into one of his most memorable.

Robin collaborated with a wide range of composers, from his original partner Whiting and his frequent co-writer, Ralph Rainger (pictured at right with Robin), who died in a tragic plane accident in 1942, to Jerome Kern, David Rose, Arthur Schwartz, Frederick Holland, Harold Arlen, Harry Warren and Jule Styne. Forming Paramount’s go-to movie music team before moving to Fox, Robin and Rainger wrote hundreds of songs for some of the screen’s most memorable characters, from Marlene Dietrich’s femme fatale cabaret singer Helen Faraday in “Blonde Venus” (1932) to five-year-old Shirley Temple in “Little Miss Marker” (1934), from Claudette Colbert’s Sally Trent in “The Torch Singer” (1933) to Jessica Dragonette’s Princess Glory of Lilliput in the animated “Gulliver’s Travels.” (1939).

“I can remember my grandfather from when I was five years old,” says the 62-year-old Ora. “I learned to swim in the pool of his home in Beverly Hills. We bonded, not so much about his career, but things we both loved, like baseball... He was a big Dodger fan. One of his favorite people was Vin Scully. He admired the way he told the story of the game with words. He took my brother and I to the 1966 World Series between the Dodgers and the Baltimore Orioles.”

These days, Ora spends his time dealing with Robin’s publishing assets – which are represented by a variety of companies, including Sony/ATV and Music Sales Group – yielding an annual return well into “six figures.”

“Leo was a very private man, but he loved to tell stories about the old days in Hollywood,” says Ora.

By 1949, a Hollywood success, Robin returned to Broadway with Jule Styne to create the score for “Gentleman Prefer Blondes,” a vehicle for Carol Channing and later a movie starring [Marilyn Monroe](#), whose longtime assistant, ironically enough, was Leo’s third wife Cherie Redmond, Ora’s maternal grandmother. The song became an enduring pop culture staple when [Madonna](#) borrowed its imagery for her “Material Girl” video, while Monroe did the same for “Thanks for the Memory,” when she tacked it on to her steamy birthday salute to President John F. Kennedy at New York’s Madison Square Garden. Other iconic Leo Robin-inspired moments include James Brown tackling “Prisoner of Love” just before splaying to his knees at the famed T.A.M.I. Show at Santa Monica Civic Auditorium in 1964.

“My grandfather enjoyed his life, but he’d rather hang out to Nate & Al’s than talk about himself,” says Ora. “He didn’t think anyone would be interested in what he did. Music historian Michael Feinstein says it best ‘Leo Robin is an unsung genius of American popular song.’”

And his legacy just happens to define the modern sound era of motion pictures.



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Exhibit 13

Leo Robin Music

Leo Robin Music is Outraged over the Hollywood Walk of Fame's Decision to Not Install Leo's Long-Lost Star ("#LeosLostStar") Awarded to the "Thanks for the Memory" Oscar-Winning Lyricist 30 Years Ago

Tuesday, June 23, 2020 9:35 AM EST

SHERMAN OAKS, CA / ACCESSWIRE / June 23, 2020 / Leo Robin Music is outraged over the Hollywood Walk of Fame's decision at their annual meeting and subsequent announcement last week to once again deny the installation of the star that was awarded to lyricist, Leo Robin, 30 years ago. Ashley Lee from the Los Angeles Times first broke on May 23, 2019 this fascinating story, *[Leo Robin never got his Walk of Fame star. Now his grandson is fighting for it](https://pr.report/YeGJ57VB)* (<https://pr.report/YeGJ57VB>), about his grandson's serendipitous discovery of Leo's long-lost star which he believes got lost because "[The Hollywood Chamber of Commerce]...made this 30-year-old mistake." Leo Robin's wife, Cherie Robin, and actor, Bob Hope, sponsored Leo for a star in 1988 but, sadly, Mrs. Robin passed away slightly more than one year before the letter was sent out from the Hollywood Chamber announcing that her husband had been awarded the star and so, unfortunately, it was never installed.

In the wake of the release of this story last year by The Times, Leo Robin Music was infuriated to learn what happened 30 years ago. Ms. Lee reported, "The envelope was returned to its sender and has since remained in the Chamber of Commerce's records." She also tweeted, "at first I didn't believe that Leo Robin's star had really slipped through the cracks" with a photo of that acceptance letter and the envelope stamped "RETURN TO SENDER." Ms. Lee explained the Chamber's view, "A mistake it was not, noted (Ana) Martinez [Producer of the Walk Of Fame] to The Times. Back in 1989, before the ease of email and cell phones, honorees were not as repeatedly and actively pursued to secure their star as they are today. That means no follow-up letters and no calls to co-signers, even if Robin's application was co-signed by (Bob) Hope, who has four stars on the Walk."

The Chamber should live, love and learn the lyrics of the Elvis Presley 1962 hit "Return to Sender," a song about a man sending a letter by post to his girlfriend after an argument. She continually writes "Return to Sender" and he keeps mailing letters including "sent it special D" and "This time I'm gonna take it myself and put it right in her hand." Elvis, who recorded "Blue Hawaii," a classic written by Leo Robin and Ralph Rainger, for his film of the

same name and the soundtrack of which stayed at #1 on the album chart for twenty consecutive weeks, would be rock 'n' rolling in his grave and singing "Suspicious Minds" upon learning that the Hollywood Chamber only sent one letter with no follow-up letter or call to co-sponsor, Bob Hope. No matter when or where -- whether it be 1962 when Elvis sang about it or 1990 when the Chamber obstructed delivery of the letter or even today -- it has always been true when a letter has been marked "Return to sender," the sender will verify the address and resend it. What the Chamber did after the letter was returned to sender was not customary practice but smacks of disregard for the individuals honored by the Walk of Fame Committee.

Elvis Presley singing "Blue Hawaii"



(<https://pr.report/tR3jYMpb>)

Elvis Presley singing "Blue Hawaii," composed by Ralph Rainger with lyrics by Leo Robin, in connection with the groundbreaking concert, Aloha from Hawaii Via Satellite, headlined by the "King of Rock and Roll" that took place in Honolulu on January 14, 1973

The official blog of Graceland says, "Elvis loved the beauty of Hawaii and the state's laid-back atmosphere so much that he brought it home to Graceland." The beginning of the blog entry on July 14, 2017 captures this feeling inspired by the islands with these perfect lyrics written by Leo Robin, "*Dreams come true in blue Hawaii...*" "Blue Hawaii" was introduced by the stars Bing Crosby and Shirley Ross in the 1937 Paramount Pictures film *Waikiki Wedding*. Crosby subsequently recorded a version that was released in 1937 and it was recorded that same year by Al Bowlly. Elvis Presley made it famous all over again in 1961 in the movie of the same name. The song received numerous cover versions through the years ranging from jazz to country artists such as Frank Sinatra's 1958 album *Come Fly With Me*, Andy Williams 1959 albums *Two Time Winners* and *To You Sweetheart*, Ray Charles' 1960 album *The Genius Hits The Road*, on which every song was about a specific place in the United States, Pat Boone with his wife Shirley Boone on their 1962 album *I Love You Truly*, Dolly Parton with Al Harrington on the episode *My Hawaii* of her 1988 TV variety show *Dolly* and Willie Nelson's 1992 album *Honeymoon in Vegas*.

Meanwhile, the Hollywood Chamber has exercised wanton disregard of its own rules for the star awarded to Robin but never installed. In contradiction to its mission, the Hollywood Chamber is not doing justice to the nomination of Robin. Instead we are

witness to the injustice of Leo's long-lost star and the Chamber's refusal to honor their commitment to Robin's memory. Moreover, in a [press release \(https://pr.report/krG7nlhq\)](https://pr.report/krG7nlhq) issued by Leo Robin Music on July 30, 2019, the following was said about the Hollywood Chamber, "What a strange twist in irony; the Chamber, which administers this famous sidewalk landmark and usually assists honorees, performed the opposite of its mission and public expectations. Instead of assisting, the Chamber obstructed installation by ignoring emails for a whole year and failing to honor its promise for the Walk of Fame Committee to consider the grandson's request for the star to be placed on the Hollywood Walk of Fame."

When Robin's grandson called the Chamber and spoke to Ms. Martinez on July 6, 2017, almost three years ago, he told her about his discovery of Leo's long-lost star. She confirmed it was true and said, "Nothing like this has ever happened before." Throughout the past sixty years, the Chamber has successfully kept track of 2,690 honorees and has seen to it that each and every one of them received a star and had it successfully installed on the Hollywood Walk of Fame with their name on it -- except for Leo. At this point, one can't help but conclude that Robin, his sponsors, his family and the 1990 Walk of Fame Committee, itself, have been treated unjustly by the Chamber.

Upon the passing of Johnny Grant on January 9, 2008, Mayor Antonio Villaraigosa said, "Angelenos will always remember Johnny as the heart of Hollywood Boulevard, the dignified guardian of its gilded prestige and the human shine behind every one of its stars..." Johnny Grant, who was Chairman of the 1990 Walk of Fame Committee and signed the acceptance letter addressed to Mrs. Robin, must be looking down with contempt at the Hollywood Chamber for spurning the decision by the 1990 Walk of Fame Committee to award a star to Leo Robin. It is high time for the Hollywood Chamber to preserve its integrity and honor the decision of the Walk of Fame Committee and its obligation to put Leo's long-lost star in its rightful place on the Hollywood Walk of Fame!

For more information, visit the official website of Leo Robin at <http://leorobin.com/> (<http://pr.report/L1muROB6>).

About Leo Robin Music

Leo Robin Music owns the copyrights of songs written by Leo Robin, who was known as the "Dean of Lyric Writers." He created lyrics that have inspired popular music and become part of the fabric of our culture. Considered to be one of the most influential songwriters of the 20th Century, he wrote many of the country's most popular jazz standards including "Blue Hawaii," "Diamonds Are a Girl's Best Friend," "Easy Living," "If I Should Lose You," "My Ideal," "Prisoner of Love" and "Thanks for the Memory."

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Leo Robin (@LeoRobinMusic) / Twitter

SOURCE: Leo Robin Music

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Exhibit 14

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Leo Robin Media

Leo Robin Music's Open Letter to Ellen K. Re: Moral Wrong for Failure to Install "#Leosloststar" Awarded to the "Thanks For The Memory" Oscar-Winning Lyricist 30 Years Ago

Tuesday, July 14, 2020 9:35 AM

SHERMAN OAKS, CA / ACCESSWIRE / July 14, 2020 / Dear Ellen K., I, as Leo Robin's grandson, am compelled by your recent announcement and the events that have taken place over the course of 30 years to request that you redress the moral wrong committed against lyricist Leo Robin by the Hollywood Chamber and the Walk of Fame Committees (2018 - 2020). Leo Robin Music is outraged by your announcement to once again deny the installation of the star on the Hollywood Walk of Fame that was awarded to Leo Robin 30 years ago. The Hollywood Chamber as well as the Walk of Fame Committee continue to be morally adrift in regard to this unprecedented situation with the star awarded to Robin but not installed. And they must recognize that they bear responsibility for this on-going moral injustice and take the steps to address it.

In a Facebook live session on Thursday, June 18, you as chair of the Walk of Fame's Selection Panel, announced the honorees from the Hollywood Walk of Fame Class of 2021. "The Walk of Fame Selection Panel is pleased to announce 35 new honorees to the Hollywood Walk of Fame. The Selection Panel, made up of fellow Walk of Famers, hand-picks a group of honorees each year that represent various genres of the entertainment world," said Ellen K. "The Panel has done an exemplary job in choosing very talented people. We can't wait to see each and every honoree's face as they realize that they are becoming a part of Hollywood's history as we unveil their star on the world's most famous walkway!", Ellen K added.

Ellen K., you have a perfect pitch voice as the radio host on your morning radio program on KOST 103.5 FM. as well as the voice of the Grammy Awards and the Academy Awards. Unexpectedly, Leo Robin Music found your voice to be discordant in your announcement of the honorees of the Hollywood Walk of Fame Class of 2021. Leo Robin Music believes that all of the honorees chosen are exemplary but does not believe, that "The Panel has done an exemplary job in choosing very talented people." Leaving Leo Robin, over and over again, off the list of honorees to have their stars installed and "unveil(ed)...on the world's most famous walkway!" is despicable.

The outstanding contributions Leo Robin has made to The Great American Songbook are celebrated time and again with contemporary covers by artists including regularly by those appearing on the annual list of honorees. On this year's list, in the category of recording, jazz saxophonist Charlie Parker, who performed "Hallelujah" and "If I Should Lose You," was awarded a posthumous star.

Charlie Parker, nickname Yardbird or simply Bird, recorded in 1949 his first *Charlie Parker With Strings* album, consisting of six songs total, all of which were standards one of which was "If I Should Lose You," and this would become his most popular sellers. It was Yardbird's version of this song that brought it to the attention of pianists George Shearing and Oscar Peterson and vocalists Frank Sinatra and Nina Simone. A multitude of jazz artists have also recorded this song.

In the television category, actress Marla Gibbs who sang "Easy Living," was also awarded a star. Marla Gibbs sang "Easy Living" on her NBC sitcom, 227 episode entitled "Blues" in the style of Billie Holiday. "Easy Living" was written for the Paramount film of the same name in 1937 and was recorded that same year by Billie Holiday. It became a hit and would be forever associated with Lady Day starting her on a journey and establishing her as one of the important building blocks of American jazz music. The song has become immortalized through covers by many of the greatest jazz artists such as vocalists Ella Fitzgerald and Peggy Lee and trumpeter Miles Davis and pianist Bill Evans and numerous more, and in romantic drama films such as Clint Eastwood's *The Bridges of Madison County* in 1995 and Todd Haynes *Carol* in 2015.

While Leo Robin music congratulates these performers for the honors, we are woefully reminded of the fact that the star awarded to Leo Robin in 1990 was never installed. When I called the Hollywood Chamber and spoke to Ana Martinez, Producer of the Walk Of Fame, more than three years ago on July 6, 2017, I told her about my discovery of Leo's long-lost star. She confirmed it was true and said, "Nothing like this has ever happened before." After I spoke with Ms. Martinez, I followed her instructions and wrote a letter addressed to the Walk of Fame Committee, of which you have been a member for the past four years. In the letter I sent to the Walk of Fame Committee on July 11, 2017, a fresh carbon copy is enclosed, I wrote, "In light of these bizarre circumstances, I...humbly request that the Walk of Fame Committee reinstate the award to Leo of the posthumous star."

Ashley Lee from the Los Angeles Times first broke on May 23, 2019 this intriguing story, [Leo Robin never got his Walk of Fame star. Now his grandson is fighting for it](https://pr.report/YeGJ57VB) (<https://pr.report/YeGJ57VB>), about my serendipitous discovery of Leo's long-lost star which I believe got lost because "[The Hollywood Chamber of Commerce]...made this 30-year-old mistake," Ms. Lee quoting me. Leo Robin's wife, Cherie Robin, and actor, Bob Hope, sponsored Leo for a star in 1988 but, sadly, Mrs. Robin passed away slightly more than one year before the letter was sent out from the Hollywood Chamber announcing that her husband had been awarded the star and so, unfortunately, it was never installed.

In the wake of the release of this story last year by The Times, Leo Robin Music was appalled to learn what happened 30 years ago. Ms. Lee reported, "The envelope was returned to its sender and has since remained in the Chamber of Commerce's records." She also tweeted, "at first I didn't believe that Leo Robin's star had really slipped through the cracks" with a photo of that acceptance letter and the envelope stamped "RETURN TO SENDER." Ms. Lee explained the Chamber's view, "A mistake it was not, noted (Ana) Martinez to The Times. Back in 1989, before the ease of email and cell phones, honorees were not as repeatedly and actively pursued to secure their star as they are today. That means no follow-up letters and no calls to co-signers, even if Robin's application was co-signed by (Bob) Hope, who has four stars on the Walk."

The Hollywood Chamber and the Walk of Fame Committee have exercised wanton disregard of its own rules for the star awarded to Robin but never installed. Throughout the past sixty years, the Chamber has successfully kept track of 2,690 honorees and has seen to it that each and every one of them received a star and had it successfully installed on the Hollywood Walk of Fame with their name on it – except for Robin. At this point, one can't help but conclude that Robin, his sponsors, his family and the 1990 Walk of Fame Committee, itself, have been treated unjustly by the Hollywood Chamber and the Walk Of Fame Committee chaired by you.

The Hollywood Chamber along with the Walk of Fame Committee have mislaid their moral compass. What happened after I spoke to the Hollywood Chamber over the past three years - where it obstructed installation by ignoring emails from me for a whole year and failing to honor its promise for the Walk of Fame Committee to consider my request for the star to be placed on the Hollywood Walk of Fame and toying with me - is just plain wrong. What happened 30 years ago - when the acceptance letter was returned to sender and there was no follow-up letters and no calls to notify co-sponsor Bob Hope - is wrong as wrong can be. The 1990 Walk of Fame Committee awarded a star to a deserved honoree and then the Hollywood Chamber and subsequent Walk of Fame Committees would take it back. These actions over the years that resulted in the failure to install the star awarded to Robin are manifest of a moral wrong.

Ellen K., I urge you, as the chair, to find the moral compass that guides the Hollywood Chamber and the Walk of Fame Committee and set a new course. Right now, in contradiction to its mission, the Hollywood Chamber is not doing justice to the award to Robin. Instead we are witness to the moral injustice of Leo's long-lost star and the Hollywood Chamber's refusal to honor their commitment to Robin's memory. I want to reaffirm my deepest level of commitment to achieving that all of you - the Hollywood Chamber and the Walk of Fame Committee - uphold the strictest moral authority in fulfilling your commitment. This is your moral imperative.

It is high time for the Hollywood Chamber and the 2020 Walk of Fame Committee to preserve their integrity and honor the decision of the 1990 Walk of Fame Committee and its obligation to put Leo's long-lost star in its rightful place on the Hollywood Walk of Fame. It would be a wonderful tribute for the celebration of a legend who made great contributions to the music and motion picture industries and whose enduring lyrics have become part of the fabric of our culture. Leo's beloved wife Cherie Robin and actor Bob Hope sponsored Leo for a star on the Hollywood Walk of Fame and their wishes after all these years would finally be realized. For almost a century, Leo Robin's music has made the most celebrated stars on the Hollywood Walk of Fame beam even brighter. Leo Robin belongs in this constellation and his star shall shine as bright as any.

I hope you and yours are staying safe and healthy. As difficult as these extraordinary times are, I am hopeful about the power of music to inspire action, to heal and lift us up, and to liberate our minds and hearts. I remember Bob Hope in his eulogy of my beloved grandfather on January 2, 1985, when he said, "His lyrics struck such a positive note...such hopeful themes...The feelings of joy he conveyed will lift hearts for generations to come. And if you don't believe that, just hum the lyrics of "Beyond the Blue Horizon" a few times. I guarantee you'll never have to visit an analyst." Be inspired with this sample, "*Blue horizon Waits a beautiful day Goodbye to things that bore me Joy is waiting for me.*"

In Leo Robin's lyrics from *Gulliver's Travels* -1939,

"Faithful Forever," Leo Robin Music

cc: copy sent FedEx overnight to Ellen K.

For more information, visit the official website of Leo Robin at <http://leorobin.com/> (<http://pr.report/L1muROB6>).

CONTACT:

Scott D. Ora

President - Leo Robin Music

thanks4thememory@icloud.com (<mailto:thanks4thememory@icloud.com>)

(818) 618-2572

Leo Robin (@LeoRobinMusic) / Twitter

SOURCE: Leo Robin Music

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Leo Robin Media

Leo Robin Music's Second Open Letter to Ellen K. Re: Moral Wrong for Failure to Install the Star, ("#Leosloststar"), Awarded to the "Thanks For The Memory" Oscar-Winning Lyricist More Than 30 Years Ago

Tuesday, August 11, 2020 9:40 AM

SHERMAN OAKS, CA / ACCESSWIRE / August 11, 2020 / Dear Ellen K., I, Leo Robin's grandson, sent you an [open letter on July 14, 2020 \(https://pr.report/Y5zU0EsW\)](https://pr.report/Y5zU0EsW) via FedEx, almost a month ago, but assume that you never received it since I haven't heard back from you. I am enclosing it once more so you will better understand the unprecedented circumstances surrounding the long-standing mistake made by the Hollywood Walk of Fame more than 30 years ago. The 1990 Walk of Fame Committee awarded a star to lyricist Leo Robin and then the Hollywood Chamber of Commerce and subsequent Walk of Fame Committees would take it back. These actions over the years that resulted in the failure to install the star awarded to Robin are manifest of a moral wrong.

To borrow the lyrics from the song "Faithful Forever," composed by Ralph Rainger with lyrics by Leo Robin, introduced in the 1939 animated film Gulliver's Travels, which was recorded by many jazz artists such as vocalists Mildred Bailey and Perry Como and the orchestras in their heyday including Glenn Miller, Benny Goodman, Woody Herman and Guy Lombardo: "Faithful forever I promise to be" certain that the Hollywood Chamber finally installs the star awarded to Leo Robin for all the visitors of the Hollywood Walk of Fame to see.

In the wake of the release of the story *Leo Robin never got his Walk of Fame star. Now his grandson is fighting for it.* (<https://pr.report/0PKYxTlp>) which first broke on May 23, 2019 by Ashley Lee from the Los Angeles Times, we learned what happened 30 years ago. Ms. Lee reported, "The envelope was returned to its sender and has since remained in the Chamber of Commerce's records." She also tweeted, "at first I didn't believe that Leo Robin's star had really slipped through the cracks" with a photo of that acceptance letter and the envelope stamped "RETURN TO SENDER." Ms. Lee explained the Chamber's view, "A mistake it was not, noted (Ana) Martinez to The Times. Back in 1989, before the ease of email and cell phones, honorees were not as repeatedly and actively pursued to secure their star as they are today. That means no follow-up letters and no calls to co-signers, even if Robin's application was co-signed by (Bob) Hope, who has four stars on the Walk."

What happened 30 years ago -- when the acceptance letter was returned to sender and there was no follow-up letters and no calls to notify co-sponsor Bob Hope -- is wrong as wrong can be. Throughout the past sixty years, the Chamber has successfully kept track of 2,690 honorees and has seen to it that each and every one of them received a star and had it successfully installed on the Hollywood Walk of Fame with their name on it -- except for the "Passover" of Robin. At this point, one can't help but conclude that Robin, his sponsors, his family and the 1990 Walk of Fame Committee, itself, have been treated unjustly by the Hollywood Chamber and the Walk Of Fame Committee chaired by you.

The failure of the Hollywood Chamber to install the star awarded to Robin is hard to fathom but remember that my grandmother who was the sponsor passed away before receiving notification and that the co-sponsor, actor Bob Hope, was never notified. It is high time for the Hollywood Chamber and the 2020 Walk of Fame Committee to preserve their integrity and honor the decision of the 1990 Walk of Fame Committee and its obligation to put Leo's long-lost star in its rightful place on the Hollywood Walk of Fame. It is my hope that you, as Chair of the Walk of Fame Committee, will take the necessary steps to correct this moral wrong and award my grandfather, the legendary songwriter, Leo Robin, his long-overdue star.

I hope you and yours are staying safe and healthy. As difficult as these extraordinary times are, I am hopeful about the power of music to inspire action, to heal and lift us up, and to liberate our minds and hearts. I remember Bob Hope in his eulogy of my beloved grandfather on January 2, 1985, when he said, "His lyrics struck such a positive note...such hopeful themes...The feelings of joy he conveyed will lift hearts for generations to come. And if you don't believe that, just hum the lyrics of "Beyond the Blue Horizon" a few times. I guarantee you'll never have to visit an analyst." Be inspired with this sample, "*Blue horizon Waits a beautiful day Goodbye to things that bore me Joy is waiting for me.*"

In Leo Robin's lyrics from *Gulliver's Travels* -1939,

"Faithful Forever," Leo Robin Music

Enclosure

cc: copy sent FedEx overnight to Ellen K.

For more information, visit the official website of Leo Robin at <http://leorobin.com/> (<http://pr.report/L1muROB6>).

CONTACT:

Scott D. Ora

President - Leo Robin Music

thanks4thememory@icloud.com (<mailto:thanks4thememory@icloud.com>)

(818) 618-2572

Leo Robin ([@LeoRobinMusic](https://pr.report/V9NRXsaM) (<https://pr.report/V9NRXsaM>)) / Twitter

SOURCE: Leo Robin Music

Scene from the animated film Gulliver's Travels with the song Faithful...



Scene from the animated film Gulliver's Travels with the song "Faithful Forever," composed by Ralph Rainger with lyrics by Leo Robin, sung by Jessica Dragonette, Lanny Ross and chorus in 1939

Each year, Leo Robin Music awaits with great interest the release of the annual announcement by the Hollywood Chamber of the new class of honorees to have their stars unveiled and installed on the Hollywood Walk of Fame to see if the star awarded to lyricist Leo Robin more than 30 years ago but never installed finally appears on this list. For Leo Robin, this annual ritual is known as "Pass Over." I am outraged by the Hollywood Chamber's recent announcement to once again "Pass Over" the installation of the star on the Hollywood Walk of Fame that was awarded to Robin more than 30 years ago.

In a Facebook live session on Thursday, June 18, you as chair of the Walk of Fame's Selection Panel, announced the honorees from the Hollywood Walk of Fame Class of 2021. "The Walk of Fame Selection Panel is pleased to announce 35 new honorees to the Hollywood Walk of Fame. The Selection Panel, made up of fellow Walk of Famers, hand-picks a group of honorees each year that represent various genres of the entertainment world," said Ellen K. "The Panel has done an exemplary job in choosing very talented people. We can't wait to see each and every honoree's face as they realize that they are becoming a part of Hollywood's history as we unveil their star on the world's most famous walkway!", Ellen K added.

The "Pass Over" of Robin by the Hollywood Chamber and Walk of Fame Committee on the list of honorees to have their stars installed and unveiled on the Hollywood Walk of Fame is a moral wrong. Ellen K., you have a perfect pitch voice on your morning radio program on KOST 103.5 FM. as well as the voice of the Grammy Awards and the Academy Awards. The recent announcement by you would be tantamount to announcing a winner at the Grammy Awards or at the Academy Awards and then not giving the winner a Grammy or an Oscar to take home.

Can you imagine if multi-Grammy winner Tony Bennett winning the Grammy Award for Best Traditional Pop Vocal Performance in 1997 for his album *Here's to the Ladies* -- which theme of the album was songs made famous by female singers and included "My Ideal" with lyrics by Robin to pay tribute to Margaret Whiting for performing her theme song -- but not being given the Grammy to take home or multi-Oscar winner Robert De Niro winning for Best Actor the Oscar in 1980 for the film *Raging Bull* -- which used a few songs with lyrics by Robin including "Prisoner of Love" performed by Perry Como (1946), "Prisoner of Love" performed by Russ Columbo (1934) and "Bye, Bye Baby" performed by Marilyn Monroe (1953) -- but not being given the Oscar to take home.

Exhibit 15

LEO ROBIN MUSIC

August 17, 2020

Ellen K.
Chair of the Walk of Fame Committee
KOST 103.5 iHeartRadio
3400 W. Olive Ave Burbank CA 91505

Dear Ellen K.,

Thank you for taking the time to talk with me this past Tuesday to discuss the star awarded to my grandfather, Leo Robin, but never installed. I enjoyed our conversation and was especially impressed to learn about how you are excelling during these trying times with your application of technology and phenomenal ratings. To have a better understanding about this unprecedented situation surrounding the long-standing mistake made by the Hollywood Chamber of Commerce regarding the star awarded to my grandfather on the Hollywood Walk of Fame more than 30 years ago, I am providing further details that I previously sent to you more than three years ago.

On July 6, 2017, after I spoke with Ana Martinez, I followed her instructions and drafted a letter addressed to the Walk of Fame Committee, explaining what had happened and requesting that Leo's 1990 posthumous star be placed on the Hollywood Walk of Fame. On July 11, 2017, I emailed Ms. Martinez, as she'd requested, the letter to forward to the Committee, of which you were a member at the time, along with official documents. Based on our conversation, I understand you never received a copy of the letter I sent to the Committee so I am now providing you a copy of this correspondence.

In light of these mail issues, I know that you were amused by the recent difficulty of my letters reaching you at KOST 103.5, iHeartRadio at the Olive Ave address due to the temporary closure of the building. Maybe there's a jinx. After all, we remember what happened 30 years ago when the acceptance letter was returned to sender and again three years ago when my letter to the Walk of Fame Committee went unanswered for a year and yet again when you, the addressee, as a member of the Committee, never previously received this letter. But there is a major distinction now, as soon as you became aware of the letter indirectly by the open letter, you took responsible action to contact me with a phone call. I find it amusing too that the only way for me to communicate with members of the Committee like you is with a press release.

Even though my experience with the Hollywood Chamber has been challenging, I feel that it is my mission to see that my grandfather gets his star. I am willing to honor the original commitment made back in 1988 by my grandmother, Cherie Robin, and Bob Hope. But, it would be unfair for his sponsors to have to pay ten times more for his star than anyone else's from the 1990-1991 class, even Woody Woodpecker's.

One would think that today's Hollywood Walk of Fame would honor the decisions made by those who served before them. Anyone taking the time to apply as a sponsor for a candidate to receive a star has to believe that the Hollywood Chamber would be able to process the chosen few applications correctly. And, even more so, that any candidate approved for a star, would get a star. At this point, I can't help but feel that Leo Robin, his sponsors, his family and the Walk of Fame Committee of 1990, itself, have been treated unfairly.

Scott D. Ora, Trustee



LEO ROBIN MUSIC

Again, thank you so much for giving me this opportunity to talk with you. It was a pleasure to share with you more about this unprecedented situation surrounding the star awarded to my grandfather more than 30 years ago but never installed and learn about your successful efforts during these extraordinary times.

"Faithful Forever,"

Scott Douglas Ora

Scott Douglas Ora

Trustee of Leo Robin Music

Enclosure

Scott D. Ora, Trustee



Exhibit 16

The Hollywood Chamber Makes Annual Announcement of the Honorees From the Hollywood Walk of Fame Class of 2022: For the Star Awarded to the "Thanks for the Memory" Lyricist 31 Years Ago but Never Installed, This Ritual Is Known as "Pass Over"

SHERMAN OAKS, CA / ACCESSWIRE / June 22, 2021 / Leo Robin Music was outraged by the Hollywood Chamber of Commerce's recent announcement on June 17, 2021 to once again deny the installation of the star on the Hollywood Walk of Fame that was awarded to lyricist Leo Robin more than 31 years ago. Each year, Leo Robin Music awaits with great interest the release of the annual announcement by the Hollywood Chamber of the new class of honorees to have their stars unveiled and installed on the Hollywood Walk of Fame to see if the star awarded to Leo Robin more than 31 years ago but never installed finally appears on this list. For Leo Robin, this annual ritual is known as "Pass Over."

Johnny Mathis singing "Lost in Loveliness," composed by Sigmund Romberg with lyrics by Leo Robin, which was first introduced in the 1954 Broadway musical "The Girl in Pink Tights" followed by Doris Day singing this jazz standard

A loss can be a wonderful fantasy like the lyrics by Leo Robin of the beautiful ballad "Lost in Loveliness," composed by Sigmund Romberg. In contrast, a loss can be described as "Lost in Wickedness" like with the Hollywood Chamber's treatment of the star awarded to Leo Robin but not installed. In this situation, the Hollywood Chamber along with the Walk of Fame Committee have lost their moral compass.

In a Facebook live session on Thursday, June 17, radio host Ellen K., who serves as the Walk of Fame's Selection Panel Chair, announced the honorees from the Hollywood Walk of Fame Class of 2022. "The Walk of Fame Selection Panel is pleased to announce 38 new honorees to the Hollywood Walk of Fame. The Selection Panel, made up of fellow Walk of Famers, hand-picks a group of honorees each year that represent various genres of the entertainment world," said Chair and Walk of Famer Ellen K. "The Panel did an amazing job choosing these very talented people. We can't wait to see each honoree's reaction as they realize that they are becoming a part of Hollywood's history with the unveiling of their star on the world's most famous walkway!" Ellen K added.

While Leo Robin Music congratulates these performers for the honors, we are woefully reminded of the fact that the star awarded to Leo Robin in 1990 was never installed. The Hollywood Chamber as well as the Walk of Fame Committee continue to be morally adrift in regard to this unprecedented situation with the star awarded to Leo Robin but not installed. Right now, in contradiction to its mission, the Hollywood Chamber is not doing justice to the award to Leo Robin. Instead we are witness to the moral injustice of Leo's long-lost star and the Hollywood Chamber's refusal to honor their commitment to Robin's memory.

Ashley Lee from the Los Angeles Times first broke on May 23, 2019 this fascinating story, *Leo Robin never got his Walk of Fame star. Now his grandson is fighting for it*, about his grandson's serendipitous discovery of Leo's long-lost star which he believes got lost because "[The Hollywood Chamber of Commerce]...made this 30-year-old mistake," Ms. Lee quoting him. Leo Robin's wife, Cherie Robin, and actor, Bob Hope, sponsored Leo for a star in 1988 but, sadly, Mrs. Robin passed away slightly more than one year before the letter was sent out from the Hollywood Chamber announcing that her husband had been awarded the star and so, unfortunately, it was never installed.

In the wake of the release of this story by The Times, Leo Robin Music was appalled to learn what happened 31 years ago. Ms. Lee reported, "The envelope was returned to its sender and has since remained in the Chamber of Commerce's records." She also tweeted, "at first I didn't believe that Leo Robin's star had really slipped through the cracks" with a photo of that acceptance letter and the envelope stamped "RETURN TO SENDER." Ms. Lee explained the Chamber's view, "A mistake it was not, noted (Ana) Martinez to The Times. Back in 1989, before the ease of email and cell phones, honorees were not as repeatedly and actively pursued to secure their star as they are today. That means no follow-up letters and

no calls to co-signers, even if Robin's application was co-signed by (Bob) Hope, who has four stars on the Walk."

Ellen K. has a perfect pitch voice on her morning radio program on KOST 103.5 FM. as well as the voice of the Grammy Awards and the Academy Awards. The recent announcement by Ellen K. would be tantamount to announcing a winner at the Academy Awards or the Grammy Awards and then not giving the winner an Oscar or a Grammy. Can one imagine if multi-Oscar winner Robert De Niro winning for Best Actor the Oscar in 1980 for the film *Raging Bull*, which used a few songs with lyrics by Robin including "Prisoner of Love" performed by Perry Como (1946), "Prisoner of Love" performed by Russ Columbo (1934) and "Bye, Bye Baby" performed by Marilyn Monroe (1953) but not being given the Oscar to take home or multi-Grammy winner Tony Bennett winning the Grammy Award for Best Traditional Pop Vocal Performance in 1997 for his album *Here's to the Ladies*, which theme of the album was songs made famous by female singers and included "My Ideal" with lyrics by Robin to pay tribute to Margaret Whiting for performing her theme song but not being given the Grammy to take home. The "Pass Over" of Robin by the Hollywood Chamber and Walk of Fame Committee on the list of honorees to have their stars installed and unveiled on the Hollywood Walk of Fame is wicked.

The Broadway musical "The Girl in Pink Tights," composed by Sigmund Romberg with lyrics by Leo Robin, opened in 1954 but had a major problem in staging the show because Romberg died three years earlier, in 1951, at the age of 64. In spite of it only being a modest success onstage, it produced the lovely ballad "Lost in Loveliness," which generated chart records for Billy Eckstine and Dolores Gray.

This song whose heartfelt lyrics about the aspirations of love have been performed through the ages by a wide spectrum of entertainers from the most celebrated jazz musicians such as trumpeter Wynton Marsalis, Billy Eckstine and Duke Ellington to vocalists such as David Atkinson, Doris Day, Eddie Fisher, Johnny Mathis and Jimmy Smith to orchestras such as Tommy Dorsey and His Orchestra and Lincoln Center Jazz Orchestra.

Throughout the past sixty years, the Hollywood Chamber has successfully kept track of 2,696 honorees and has seen to it that each and every one of them received a star and had it successfully installed on the Hollywood Walk of Fame with their name on it - except for Leo Robin. Unfortunately, one can't help but conclude that Robin has been treated unjustly by the Hollywood Chamber. Upon

the passing of Johnny Grant on January 9, 2008, Mayor Antonio Villaraigosa said, "Angelenos will always remember Johnny as the heart of Hollywood Boulevard, the dignified guardian of its gilded prestige and the human shine behind every one of its stars..." Johnny Grant, who was Chairman of the 1990 Walk of Fame Committee and signed the acceptance letter addressed to Mrs. Robin, must be looking down repugnantly at the Hollywood Chamber's unjust treatment of Robin and spurning the decision by the 1990 Walk of Fame Committee to award a star to Leo Robin.

The award of the star would be a bittersweet moment for the family of Robin. It's unfortunate that the original sponsors, Robin's wife Mrs. Robin and actor Bob Hope, are not here today to accept the honors and that generations of Leo's family who were here when the award was offered are no longer around. While the honorees from the Hollywood Walk of Fame Class of 2022 along with their families and friends celebrate the installation of their star on the Hollywood Walk of Fame, the Robin's family must endure their annual ritual known as "Pass Over." It's time for the Hollywood Chamber to respect the decision made by the 1990 Walk of Fame Committee and honor its obligation to put Leo's long-lost star in its rightful place on the Hollywood Walk of Fame.

For more information, visit the official website of Leo Robin at <http://leorobin.com/>.

CONTACT:

Scott D. Ora

President - Leo Robin Music

thanks4thememory@icloud.com

(818) 618-2572

Leo Robin (@LeoRobinMusic) / Twitter

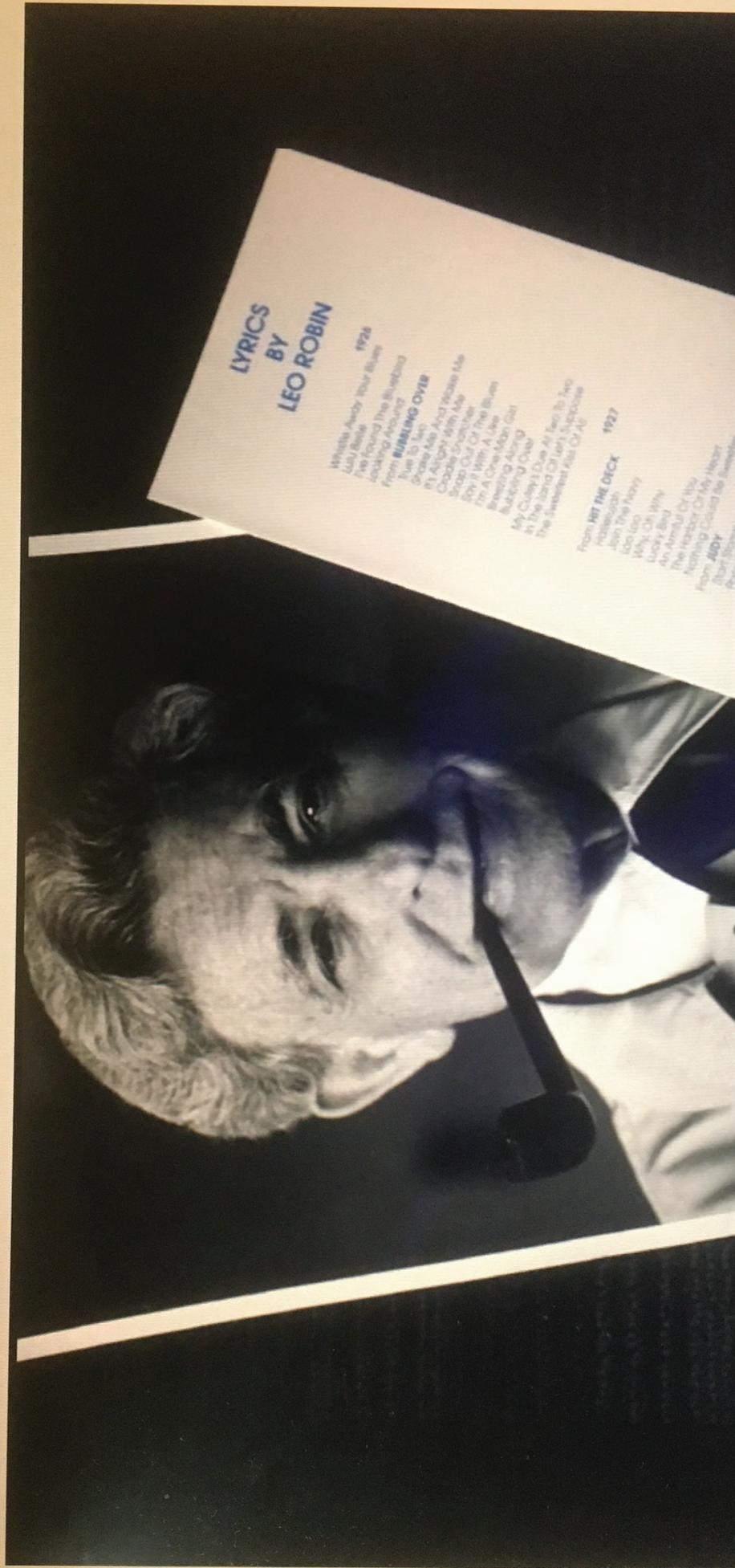
SOURCE: Leo Robin Music

Exhibit 17

appearing on the Los Angeles Times website:

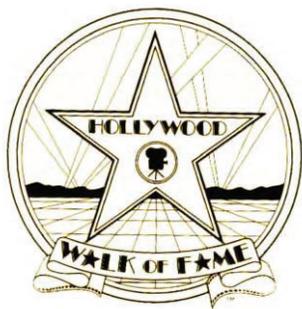
Leo Robin never got his Walk of Fame star. Now his grandson is fighting for it.

By ASHLEY LEE MAY 23, 2019 | 6:00 AM



Materials from the original 1988 application for Leo Robin's posthumous star, sent by his wife. She passed away a little more than a year before learning that Robin had been awarded the star. Thirty years later, Robin's grandson is attempting to get the star installed. (Myung J. Chun / Los Angeles Times)

Exhibit 18



HOLLYWOOD WALK OF FAME

Nomination for 2019 Selection

NOMINEE: _____

CATEGORY:

(CHECK ONLY ONE CATEGORY)

- Motion Pictures
- Live Performance/Theatre
- Television
- Recording
- Radio

THIS FORM HAS BEEN UPDATED.

NO PREVIOUS FORMS
WILL BE ACCEPTED.



2019

CHECK ONLY IF APPLICABLE Posthumous* Duo or Group

SPONSOR: _____

ADDRESS: _____

CITY: _____ STATE: _____ ZIP: _____

COUNTRY: _____ EMAIL: _____

TELEPHONE: _____ FAX: _____

FOR NOMINATIONS BY STUDIOS: PLEASE PROVIDE NAME OF NOMINEE'S PERSONAL PUBLICIST: _____

PLEASE CAREFULLY REVIEW THE FOLLOWING BEFORE COMPLETING THIS FORM:

QUALIFICATIONS OF NOMINEE: *(use additional sheet if necessary)*

All applicants must have written consent from celebrity which states that nominee is in agreement with the nomination.

Letter of consent must be attached to nomination form.

1. It is understood that the cost of installing a star in the Walk of Fame upon approval is \$40,000** and the sponsor of the nominee accepts the responsibility for arranging for payment to the Hollywood Historic Trust, a 501(c)3 charitable foundation.
2. It is further understood that, should the above-named nominee be chosen for placement in the Walk of Fame, said nominee guarantees to be present at the dedication ceremonies on a date and time mutually agreed upon with the Walk of Fame Committee. An induction ceremony must be scheduled within two years of June selection date, or the nomination must be re-submitted. Induction ceremonies are public events. Honorees recognize that, as such, footage and photos of the event are in the public realm. Honorees and speakers are expected to sign a release allowing the Hollywood Chamber of Commerce to use footage of the ceremony to promote Hollywood and the Walk of Fame.
3. First-time nominations not selected will automatically roll over for another year. If not selected during their second attempt, the nomination must be re-submitted with updated materials.
4. See "Special Rules For Performing Duos and Groups" at "Nomination Procedures" at <http://www.walkoffame.com/pages/nominations> before submitting any nomination for a Performing Duo or Group.
5. "Walk of Fame" and all associated symbols are trademarks of the Hollywood Chamber of Commerce and may not be used without permission. Any proposed promotional activities in conjunction with the Hollywood Walk of Fame ceremonies must be expressly approved in advance by the Hollywood Chamber of Commerce. Applications must be submitted by noon on Thursday, May 31, 2018.

* Posthumous nominations can be submitted after the fifth anniversary of death

** Sponsorship fees subject to change.

SPONSORS SIGNATURE: _____ DATE: _____



LETTER OF ACCEPTANCE

TO BE COMPLETED AND SIGNED BY TALENT AND/OR MANAGEMENT
NOMINEE: _____

Date _____

To Hollywood Walk of Fame Committee
In C/O Ana Martinez, Producer, Hollywood Walk of Fame

Dear Ms Martinez,

I, the undersigned _____
do hereby gladly accept the nomination put forth on my behalf for a star on the famous
Hollywood Walk of Fame.

- If selected, I will participate in person at the Walk of Fame star dedication ceremony.
- If selected, I will make arrangement to accept honor and schedule star ceremony within two years.
- I understand and agree that the Hollywood Chamber of Commerce will retain the rights to the Walk of Fame star ceremony.
- YES! I'd like to make a donation of memorabilia for our future Hollywood Walk of Fame museum.

Name: _____

Address: _____

Telephone: _____

Email: _____

Signature: _____

This original signed letter of agreement from Nominee must be mailed to:

Walk of Fame Committee:
c/o Ana Martinez, Hollywood Chamber of Commerce
6255 Sunset Blvd, Ste 150, Hollywood, CA 90028
email: stargirl@hollywoodchamber.net | fax 323-469-2805
NO LATER THAN NOON ON THURSDAY, MAY 31, 2018

2019
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will be accepted.
UPDATED 7/1/2017



HOLLYWOOD WALK OF FAME COMMITTEE NOW ACCEPTING WALK OF FAME NOMINATIONS FOR YEAR 2019

All Nomination Forms must be submitted by
Thursday, May 31, 2018 at 12 Noon to be considered in
June Selection Meeting

Download your Hollywood Walk of Fame Nomination Application at the below url:
<http://www.walkoffame.com/media/walkoffamenomination.pdf>

Hollywood Walk Of Fame Nomination Procedure

Nominations for the Hollywood Walk of Fame are now being accepted by the Hollywood Chamber of Commerce. Deadline for submission is Thursday, May 31, 2018 at 12 noon. All nominations will be considered at the annual Walk of Fame Committee meeting to be held in June. The committee will make selections for the year 2019.

Nomination applications can be obtained by downloading the link above or by sending a self-addressed, stamped envelope to:

Walk of Fame Committee
c/o Ana Martinez, Hollywood Chamber of Commerce
6255 Sunset Blvd, Ste 150
Hollywood, CA 90028

The Walk of Fame includes five categories:

- Motion Pictures
- Television
- Radio
- Recording
- Live Theatre/Performance.

All Nominations must include these documents:

- Photo of the nominee
- Brief bio of nominee - *no more than 5 pages*
- Nominee's qualifications
- List of contributions to the community and civic-oriented participation of the nominee
- Letter of agreement from the nominee or his/her management

The committee will select approximately 30 names for insertion into the Walk. Nomination of an individual or group must be approved by the Walk of Fame Committee, sometimes requiring several annual nominations before a nominee is selected to receive a star. The most qualified artists nominated are eligible for a star to be installed in the Walk during the subsequent year. Those not selected for the current year are requested to resubmit for the following nomination period. Should sponsor not want to make a second attempt, they must notify the Hollywood Chamber immediately, and the application will be pulled.

The criteria for receiving a star consists of the following: professional achievement, longevity in the category of five years or more, contributions to the community and the guarantee that the celebrity will attend the dedication ceremony if selected. Posthumous awards require a five-year waiting period.

After the Walk of Fame Committee has made its selections, the Chamber's Board of Directors also votes to approve the star and then for a final approval, the names are submitted to the City of Los Angeles' Board of Public Works Department.

All honorees must be approved by the Hollywood Chamber of Commerce, the decisions of which are final and entirely within the Chamber's discretion. Nomination and selection procedures, forms, and qualifications are guidelines only, entirely within the Chamber's discretion, and are subject to change at any time, without notice.

Special Rules for Performing Duos and Groups:

The current owner(s) of a performing duo or group name must consent in writing to the nomination before it will be considered. The names of all group members, past and present, must be included on the nomination form. The Hollywood Chamber of Commerce reserves the right to condition award and installation of any star honoring a duo or group on its discretionary satisfaction with the sponsor's arrangements regarding honorees and the installation ceremony. The sponsor must provide proof of insurance naming the Hollywood Chamber and City of L.A. as additionally insured.

All Nomination Forms must be submitted by

Thursday, May 31, 2018 at 12 Noon

to be considered in June Selection Meeting.

See a Sample Nomination in this form or at below url

<http://www.walkoffame.com/pages/nominations>

and read FAQ before submitting your form at the below url:

<http://www.walkoffame.com/pages/faqs>

If you still have any questions, please

email info@hollywoodchamber.net

or call 323-469-8311 and ask for Ana Martinez.

To request your a copy of the nomination form, please send a self-addressed, stamped envelope to:

Walk of Fame Committee

c/o Ana Martinez, Hollywood Chamber of Commerce

6255 Sunset Blvd, Ste 150, Hollywood, CA 90028

Hollywood citizens and tourists alike look forward to each dedication ceremony with eager anticipation.





HOLLYWOOD WALK OF FAME COMMITTEE NOW ACCEPTING WALK OF FAME NOMINATIONS FOR YEAR 2019

All Nomination Forms must be submitted by
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Download your Hollywood Walk of Fame Nomination Application at the below url:
<http://www.walkoffame.com/media/walkoffamenomination.pdf>

Hollywood Walk Of Fame Frequently Asked Questions

Q: How can I nominate someone for a Walk of Fame Star?

A: You can nominate your favorite celebrity with their permission by downloading and completing the Walk Of Fame Nomination Form on our official website www.walkoffame.com.

Q: Who can do the nominating?

A: Anyone, including a fan, can nominate a celebrity as long as the celebrity or his/her management is in agreement with the nomination. If there is no letter of agreement included from the celebrity or his/her representative, the committee will not accept the application.

Q: What is the cost of a Walk of Fame star ceremony?

A: \$40,000 after selection. The money is used to pay for the creation and installation of the star, as well as maintenance of the Walk of Fame. Price subject to change.

Q: Can someone who is deceased be nominated?

A: Yes. One posthumous award may be given each year.

Q: Can someone who is deceased be nominated for a star immediately?

A: No. A posthumous nomination has a five year waiting period.

Q: Is posthumous waiting period five years after the date of their death?

A: Yes. There is a five year waiting period after death.

Q: Can I nominate someone who doesn't fit in any of the five categories?

A: No. The categories do not change and the nominee must be or have been active in the field of entertainment.

Q: How long after someone has been nominated will the ceremony take place?

A: The recipient has up to five years to schedule their ceremony. If it is not done within the five-year period, it will expire and an application must be resubmitted.

Q: Does the committee accept signatures, petitions or phone calls?

A: The committee does not accept signatures, phone calls, e-mails, or any form of petitions for a nomination. Only official Walk of Fame applications are accepted.

Q: Who are the members of the Walk of Fame selection committee?

A: Each of the five categories is represented by someone with expertise in that field.

Q: How often are stars voted in?

A: Stars are voted in once a year in June. An average of 30 stars are selected per year.

Q: If a nominee isn't selected during the voting process, do I have to re-submit the application for the following year?

A: The application is effective for two years. If, after two years, the nominee is still not selected, the applicant can file a new application or send a letter requesting that the application be reinstated. Updates on the recipients are accepted and included in their file.

Q: When does the Committee meet?

A: The Committee meets once a year, in June.

Q: How can I find out if someone has a star on the Walk of Fame?

A: You can find star locations on the Walk of Fame Directory on www.walkoffame.com.

Q: Can I attend a Walk of Fame ceremony?

A: Walk of Fame ceremonies are open and free to the public. There is a public viewing area set up for all to enjoy. Please be aware that ceremony dates are subject to change. Call the Walk of Fame information line (323-469-8311) or check our website www.walkoffame.com for verification.

Q: How many nominations are submitted each year?

A: The committee receives an average of two hundred applications a year.

Q: Why do some stars face one way and others face another?

A: So that people walking either direction can see the stars easily.

Q: What are the stars made of?

A: Terrazzo and brass.

2019
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No previous forms
will be accepted.

UPDATED 6/1/2017



HOLLYWOOD WALK OF FAME COMMITTEE NOW ACCEPTING WALK OF FAME NOMINATIONS FOR YEAR 2019

All Nomination Forms must be submitted by
Thursday, May 31, 2018 at 12 Noon to be considered in
June Selection Meeting

Download your Hollywood Walk of Fame Nomination Application at the below url:
<http://www.walkoffame.com/media/walkoffamenomination.pdf>

Hollywood Walk Of Fame Nomination Sample

PLEASE FOLLOW THIS PREFERRED SAMPLE FOR WALK OF FAME NOMINATION FORM

KEVIN COSTNER

Often portrayed as America's sexiest actor, Kevin Costner's talent is what has truly guided him through his immensely successful career. An actor, producer and director, Costner gave bus tours of the stars homes in Hollywood before landing his first role in THE BIG CHILL although his scenes eventually made their way to the cutting room floor. He has gone on to appear in over thirty films spanning the last two decades. His most credited film, DANCES WITH WOLVES, won him numerous awards, including the Oscar® for Best Director and Best Picture in 1991. Charity: Haven House-a home for victims of domestic violence.

Dances with Wolves (1990)

1991 Won Academy Award—Best Director
1991 Won Academy Award—Best Picture
1991 Nominated Academy Award—Best Actor in a Leading Role
1992 Nominated BAFTA Film Award—Best Actor, Best Direction, Best Film
1991 Won Silver Berlin Bear—Outstanding Single Achievement
1991 Nominated Golden Berlin Bear
1991 Won DGA Award—Outstanding Directorial Achievement in Motion Pictures
1991 Won Golden Globe—Best Director – Motion Picture
1991 Nominated Golden Globe—Best Performance by an Actor in a Motion Picture - Drama
1990 Won National Board Review—Best Director
1991 Won Motion Picture Producer of the Year Award
1991 Won Bronze Wrangler-Western Heritage Award—Theatrical Motion Picture

JFK (1991)

1992 Nominated Golden Globe—Best Performance by an Actor in a Motion Picture - Drama

Robin Hood: Prince of Thieves (1991)

1992 Nominated MTV Movie Awards—Best Male Performance
1992 Nominated MTV Movie Awards—Best On-Screen Duo
1992 Nominated MTV Movie Awards—Most Desirable Male

The Bodyguard (1992)

1993 Nominated MTV Movie Awards—Best Male Performer
1993 Nominated MTV Movie Awards—Best On-Screen Duo
1993 Nominated MTV Movie Awards—Most Desirable Male

Tin Cup (1996)

1997 Nominated Golden Globe—Best Performance by an Actor in a Motion Picture – Comedy/Musical

Message in a Bottle (1999)

2000 Nominated Blockbuster Entertainment Award—Favorite Actor – Drama/Romance

Misc.

1988 Won Golden Apple—Male Star of the Year
1990 Won Hasty Pudding Theatricals—Man of the Year
1992 Won People's Choice Award—Favorite Dramatic Motion Picture Actor
1993 Won People's Choice Award—Favorite Dramatic Motion Picture Actor



2019
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will be accepted.

UPDATED 7/1/2017

Exhibit 19

From: sdo007@aol.com,
To: stargirl@hollywoodchamber.net,
Subject: Re: Songwriter Leo Robin -- Fwd: Information- Per Your Request
Date: Tue, Jul 11, 2017 8:37 am

Dear Ms. Martinez,

Here, as promised, are the official records from Hillside Memorial Park that verify the passing of my grandmother.

If you have any questions, please feel free to call me at (818)618-2572.

Best wishes,

Scott

-----Original Message-----

From: Toni Heebner <theebner@hillsidememorial.org>
To: sdo007 <sdo007@aol.com>
Sent: Thu, Jul 6, 2017 2:09 pm
Subject: Information- Per Your Request

Hi Scott:

It was nice talking to you today!

Here is the information you requested:

Cherie Robin (I do not see her with the surname: Redmond): DOB: 7/4/1910 DOD: 5/28/1989
Leo Robin: DOB: 4/6/1895 DOD: 12/29/1984
Wendy Ora: DOB: 2/16/1961 DOD: 9/9/1990
Gerald Ora: DOB: 5/17/1930 DOD: 12/27/2013

Your father's memorial marker was installed on 1/29/2015. See attached photo.
I have also included a photo of your sister, Wendy's memorial marker. She is resting above your father and your mother. See photo.

Wishing you all the best,

Toni Heebner, Family Service Advisor
Hillside Memorial Park and Mortuary
6001 W. Centinela Ave
Los Angeles, CA 90045
310.641.0707 Office
310.641.3501 Fax
THeebner@hillsidememorial.org

 **Please consider the environment before printing this email**

Exhibit 20

1988 10 10 (1000)
Mrs. Ana Robin
11111 Wilshire Boulevard
Los Angeles, California 90024
Dear Mrs. Robin:

Congratulations! I am happy to inform you that Leo Robin
has been selected to receive a posthumous star on the
Hollywood Walk of Fame.

Please contact Ana Martinez-Holler, Manager of Media
or Laura Meyer, at the Hollywood Chamber of Commerce
the requirements and make arrangements for the ceremony.
They can be reached at (213) 475-1111.

If you have any questions, please call me
Sincerely,

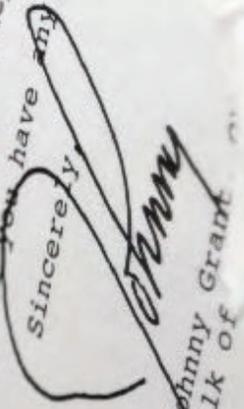

Johnny Grant
Walk of Fame
JG:jl



Exhibit 21

From: sdo007@aol.com,
To: intern@hollywoodchamber.net,
Subject: Fwd: Songwriter Leo Robin
Date: Wed, May 16, 2018 1:50 pm
Attachments: WalkofFame 7-11-17.pdf (649K)

-----Original Message-----

From: sdo007 <sdo007@aol.com>
To: stargirl <stargirl@hollywoodchamber.net>
Sent: Tue, Mar 20, 2018 2:01 pm
Subject: Fwd: Songwriter Leo Robin

Dear Ms. Martinez,

I am just following up again and look forward to hearing from you regarding the status of the email I sent to you and the Walk of Fame Committee on July 11th after our phone conversation of the 6th regarding the posthumous star that was awarded in 1990 to my grandfather, the songwriter Leo Robin, on the Hollywood Walk of Fame.

Please feel free to call me at (818) 618-2572 if you have any questions.

Best wishes,

Scott

<http://leorobin.com>

-----Original Message-----

From: sdo007 <sdo007@aol.com>
To: stargirl <stargirl@hollywoodchamber.net>
Sent: Thu, Dec 21, 2017 10:44 am
Subject: Fwd: Songwriter Leo Robin

Dear Ms. Martinez,

I hope you are having an enjoyable Holiday season and wish you a Blessed, Healthy & Happy New Year!

I am just following up and look forward to hearing from you regarding the status of the email I sent to you and the Walk of Fame Committee on July 11th after our phone conversation of the 6th regarding the posthumous star that was awarded in 1990 to my grandfather, the songwriter Leo Robin, on the Hollywood Walk of Fame.

Please feel free to call me at (818) 618-2572 if you have any questions.

Best wishes,

Scott

<http://leorobin.com>

-----Original Message-----

From: sdo007 <sdo007@aol.com>
To: stargirl <stargirl@hollywoodchamber.net>
Sent: Tue, Sep 12, 2017 11:03 am
Subject: Fwd: Songwriter Leo Robin

Dear Ms. Martinez,

With the passage of Labor Day, certainly hope you had an enjoyable one, and the last days of summer,

I just wanted to find out the status of the email I sent to you and the Walk of Fame Committee on July 11th after our phone conversation of the 6th regarding the posthumous star that was awarded in 1990 to my grandfather, the songwriter Leo Robin, on the Hollywood Walk of Fame.

Please feel free to call me at (818) 618-2572 if you have any questions.

Best wishes,

Scott

<http://leorobin.com>

-----Original Message-----

From: sdo007 <sdo007@aol.com>
To: stargirl <stargirl@hollywoodchamber.net>
Sent: Mon, Aug 7, 2017 9:19 am
Subject: Fwd: Songwriter Leo Robin

Dear Ms. Martinez,

I just wanted to make sure you received the email I sent to you and the Walk of Fame Committee on July 11th after our phone conversation of the 6th regarding the posthumous star that was awarded to my grandfather, the songwriter Leo Robin, on the Hollywood Walk of Fame in 1990.

Please feel free to call me at (818) 618-2572 if you have any questions.

Best wishes,

Scott

<http://leorobin.com>

-----Original Message-----

From: sdo007 <sdo007@aol.com>
To: stargirl <stargirl@hollywoodchamber.net>
Sent: Tue, Jul 11, 2017 8:30 am
Subject: Re: Songwriter Leo Robin

Dear Ms. Martinez,

Please find attached the letter Re: Songwriter Leo Robin to you and the Walk of Fame Committee as a PDF file.

If you have any questions, please feel free to call me at (818)618-2572.

4/11/2021

Fwd: Songwriter Leo Robin

Best wishes,

Scott

<http://leorobin.com/>

Exhibit 22

NEWS

Bob Hope: Thanks for the memories

Comedy legend dies at age 100, leaving behind wealth of TV, film credits

July 28, 2003, 3:26 AM PDT / Source: The Associated Press

Bob Hope, ski jump-nosed master of the one-liner and favorite comedian of servicemen and presidents alike, has died, just two months after turning 100. Hope died late Sunday of pneumonia at his home in Toluca Lake, with his family at his bedside, longtime publicist Ward Grant said Monday.

The nation's most-honored comedian, Hope was a star in every category open to him – vaudeville, radio, television and film, most notably a string of “Road” movies with longtime friend Bing Crosby. For decades, he took his show on the road to bases around the world, boosting the morale of servicemen from World War II to the Gulf War.

“Bob Hope, like Mark Twain, had a sense of humor that was uniquely American and like Twain, we’ll likely not see another like him,” Dick Van Dyke said Monday.

President Bush said “the nation lost a great citizen” with Hope’s death.

“Bob Hope served our nation when he went to battlefields to entertain thousands of troops from different generations,” the president said. “We extend our prayers to his family. God bless his soul.”

Hope died with his family, caretakers and a priest at his side.

“I can’t tell you how beautiful and serene and peaceful it was,” daughter Linda Hope said at a news conference Monday. “He really left us with a smile on his face and no last words. ... He gave us each a kiss and that was it.”

Hope perfected the one-liner, peppering audiences with a fusillade of brief, topical gags.

“I bumped into Gerald Ford the other day. I said, ‘Pardon me.’ He said, ‘I don’t do that anymore.’”

He poked fun gently, without malice, and made himself the butt of many jokes. His golf scores and physical attributes, including his celebrated ski-jump nose, were frequent subjects:

“I want to tell you, I was built like an athlete once – big chest, hard stomach. Of course, that’s all behind me now.”

When Hope went into one of his monologues, it was almost as though the world was conditioned to respond. No matter that the joke was old or flat; he was Bob Hope and he got laughs.

“Audiences are my best friends,” he liked to say. “You never tire of talking with your best friends.”

He was admired by his peers, and generations of younger comedians. Woody Allen called Hope “the most influential comedian for me.”

“It’s hard for me to imagine a world without Bob Hope in it,” Allen said Monday.

Hope earned a fortune, gave lavishly to charity and was showered with awards, so many that he had to rent a warehouse to store them.

Though he said he was afraid of flying, Hope traveled countless miles to entertain servicemen in field hospitals, jungles and aircraft carriers from France to Berlin to Vietnam to the Persian Gulf. His Christmas tours became tradition.

He headlined in so many war zones that he had a standard joke for the times he was interrupted by gunfire: “I wonder which one of my pictures they saw?”

So often was Hope away entertaining, and so little did he see his wife, Dolores, and their four adopted children, that he once remarked, “When I get home these days, my kids think I’ve been booked on a personal appearance tour.”

Hope had a reputation as an ad-libber, but he kept a stable of writers and had filing cabinets full of jokes. He never let a good joke die – if it got a laugh in Vietnam, it would get a laugh in Saudi Arabia.

“He was very much at home in the TV studio or on stage live anywhere, that is where he really lived,” comedian Phyllis Diller said Monday. “And, you know what, it was never a chore for him. It was never nerve-racking. He was always so completely prepared by his tremendous organization that he had put together.”

Alert and happy on birthday

On his 100th birthday, he was too frail to take part in public celebrations, but was said to be alert and happy – and overwhelmed by the outpouring of affection. The fabled intersection of Hollywood Boulevard and Vine Street was renamed Bob Hope Square, and President Bush established the Bob Hope American Patriot Award.

“He can’t believe that this is happening and that he’s made it to his Big 100,” son Kelly Hope said at the time.

He was born Leslie Towns Hope on May 29, 1903, in Eltham, England, the fifth of seven sons of a British stonemason and a Welsh singer of light opera. The Hopes emigrated to the United States when he was 4 and settled in Cleveland. They found themselves in the backwash of the 1907 depression.

The boy helped out by selling newspapers and working in a shoe store, a drug store and a meat market. He also worked as a caddy and developed a lifelong fondness for golf. A highly competitive golfer, he later shot in the 70s and sponsored the Bob Hope Golf Classic, one of the nation’s biggest tournaments.

Hope changed his name to Bob when classmates ridiculed his English schoolboy name.

He boxed for a time under the name Packy East – “I was on more canvases than Picasso” – and also tried a semester in college before devoting himself to show business. He quickly veered from song and dance to comedy patter, and his monologue routine was born.

By 1930, he had reached vaudeville’s pinnacle – The Palace – and in the ’30s he played leading parts in such Broadway musicals as “Roberta,” “Ziegfeld Follies” and “Red, Hot and Blue,” with Ethel Merman and Jimmy Durante. During “Roberta,” he met nightclub singer Dolores Reade and invited her to the show. They married in 1934.

After a few guest radio spots, Hope began working regularly on a Bromo Seltzer radio program. In 1938, he was hired by Pepsodent to create his own show, and that led him to Hollywood.

Paramount signed him for “The Big Broadcast of 1938,” in which he introduced the song that became his trademark: “Thanks for the Memory.”

Soon he was teaming with Crosby in the seven “Road” pictures – “Road to Bali,” “Road to Morocco,” “Road to Zanzibar” and so on – playing best friends who lie, cheat and make fun of each other in comedic competition for glory and Dorothy Lamour.

Many movie credits

In between, there were such pictures as “Cat and the Canary,” “The Paleface,” “Louisiana Purchase,” “My Favorite Blonde,” “That Certain Feeling,” “I’ll Take Sweden” and “Boy, Did I get a Wrong Number.” He made 53 films from 1938 to 1972.

In 1950, he entered television, and his successes continued. Even 40 years later, he could be counted on to pull in respectable ratings. He also appeared more than 20 times at the Academy Awards, first on radio and then on television, as presenter, cohost or host between 1939 and 1978.

Hope started playing to troops well before the United States entered World War II.

He tried to enlist, but was told he could be of more use as an entertainer. He played his first camp show at California’s March Field on May 6, 1941, seven months before Pearl Harbor.

His traditional Christmas tours began in 1948, when he went to Berlin to entertain GIs involved in the airlift.

“For more than five decades, through four wars and years of peacekeeping missions, Bob Hope came to symbolize, for every man and woman in uniform, the idea that America cared for and supported its troops,” said Edward A. Powell, president and CEO of the United Service Organizations.

His 1966 Vietnam Christmas show, when televised, was watched by an estimated 65 million people, the largest audience of his career. But his initially hawkish views on Vietnam opened a gap between the comedian and young Americans opposed to the war, who sometimes heckled him.

Later, Hope said he was “just praying they get an honorable peace so our guys don’t have to fight. I’ve seen too many wars.”

In 1990, he traveled to the Persian Gulf to entertain troops preparing for war with Iraq. Because Saudi Arabia bars female entertainers, he had to leave Marie Osmond and the Pointer Sisters behind in Bahrain.

Hope never had a regular straight man, but he worked often with crooner Crosby, first in radio, where they developed a routine of insulting each other merrily. Crosby helped make Hope’s nose famous as a “droop snoot” and a “ski run.” For his part, Hope replied: “Only in Hollywood could a meatball make so much gravy.”

Hope's awards included scores of honorary degrees; special Oscars for humanitarianism and service to the film industry; the George Peabody Award; the National Conference of Christians and Jews Award; and the Medal of Freedom from President Johnson. He received honorary knighthood from Britain in 1998.

He was the author or co-author of 10 books, including his 1990 autobiography, "Don't Shoot, It's Only Me."

Hope's 85-year-old nephew, Milton Hope, said Monday he hopes his uncle is remembered not just for his jokes, but also for donating his money and time to charities.

"All I can say is he sure made a lot of people happy," Milton Hope said from his home in Aurora, Ohio.

In the mid-'90s, Hope played charity dates around the nation, but he seemed to slow his schedule. What was billed as his last NBC special, "Laughing with the Presidents," focusing on his long friendships with many occupants of the White House, appeared in late 1996. His more than 60-year association with the network was said to be a record.

In recent years, his hearing eroded, although he refused to wear a hearing aid. He suffered recurring eye problems, once remarking: "I've got a hemorrhage in the right eye now, and I used to have one in the left eye. I'm a walking hemorrhage."

Until increasing frailty slowed him down, Hope repeatedly pledged never to quit entertaining.

"I'm not retiring until they carry me away," he said. "And I'll have a few routines on the way to the big divot."

Hope is survived by his wife; sons Anthony and Kelly; daughters Linda and Nora Somers; and four grandchildren.

A private burial was planned, followed by a memorial service and tribute Aug. 27, Linda Hope said. She said her mother had asked Hope in recent days where he wanted to be buried and he answered: "Surprise me."

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BOB HOPE: THANKS FOR THE MEMORIES

A Tribute To Legendary Entertainer Bob Hope

2003
JUL 28

CORRESPONDENT
REBECCA LEUNG

FACEBOOK
f

TWITTER
t

REDDIT
r

FLIPBOARD
f

For the better part of the 20th century, Bob Hope became as much an American icon as mom's apple pie.

In small towns, in run down theatres, Hope developed a craft that would allow him to dance rings around Bing Crosby. And even keep up with the fast stepping Jimmy Cagney.

Nothing gave him a bigger thrill than hearing an audience erupt in laughter.

"He loved it. And it just gave him adrenaline that was good for three or four days. In fact, for the week," says son Tony Hope, a Washington lawyer.

"I think that he started off his life as a teenager of an image of what he would become. And he became that. And he lived the personality that he created and that he was."

"You know, the theory is, behind every great comedian is a dark side. And he just didn't have that. He just wasn't that type of guy," adds daughter Linda Hope, a television producer.

"He was just a very spontaneous, happy kind of guy. And I think listening to all that applause and taking in all that positive energy had something to do with that."

In 1933, two big things happened to him. He appeared in the musical "Roberta," which made stars out of Hope and Fred MacMurray, and he met his future wife, a singer named Dolores Rade.

"I was singing 'Paper Moon' at that time, and he said, 'It was love at first song.' It was really wonderful. And we seemed to recognize each other immediately," says wife Delores. "And when I came home that night after meeting him, I told mother, I said, 'I met my husband.'"

It was Hope's genius to recognize a good thing.

The Pepsodent radio show in 1938 also put a bright smile on Hope's face and made him a national figure.

Then Hope appeared in "The Big Broadcast of 1938." This film, which was originally going to star Jack Benny, made Hope a national figure that people could watch as well as listen to.

It also introduced the song, "Thanks For The Memories," which Hope would adopt as the theme song for the rest of his career.

In 1940, Hope's career hit the high road when he teamed up with Bing Crosby to make the original buddy film, "The Road to Singapore."

Photos



Inside th... that led West's n death



The sea: Jonelle .



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Initially titled "The Road to Mandalay," it was supposed to star George Burns and Gracie Allen. But the Hope-Crosby combination proved to be irresistible, and they went on to make several road films together.

"Dad and Bing had a special relationship," says daughter Linda. "And then there was the competition with the golf - something they both enjoyed passionately."

"They were golfing every minute they could do. In fact, when they'd have any downtime in the studio, they'd be off to the golf course."

Just how much Crosby's friendship meant to Hope is illustrated in a phone call son Tony had with his dad.

"I had heard on the radio that Bing Crosby had died, and I picked up the phone and called him," recalls Tony. "He was in New York, and I said, 'Do you want me to come up?' And he said, 'No, I've canceled the show.' He said, 'I can't go on. I'm going back to Los Angeles.' And that's the only show in 70 years that I know of him not going out and doing."

Hope felt a deep commitment to his fans, and nowhere was it more obvious than when entertaining the troops which he did for more than 50 years.

But this commitment meant being away from his family for long periods of time. The Hopes had adopted four children: Linda, Tony, Kelly, and Nora. And their dad was always gone on the one day kids love best: Christmas.

But when their dad was home, the children would get a glimpse into his fertile imagination.

"He used to create a character when we were growing up that I just loved. It was a little orphan girl named Bessie," says daughter Linda.

"After a hard day at the studio, he'd come home and we'd all be scrubbed in our pajamas and he would go over to the window and call out there and he'd say, 'Bessie are you there?' and then he'd do a falsetto response: 'Hello, yes Mr. Hope, I'm out here.' And then he'd create this whole character, which was really quite charming. And I used to wonder why doesn't Bessie come in? Why doesn't he invite her in?"

Bob Hope made his widest mark on American audiences through television, a medium he helped pioneer.

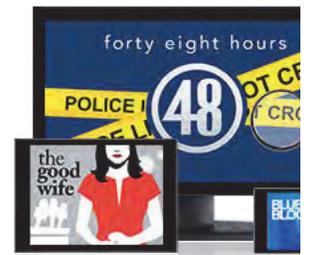
Over much of the 20th century, he made a mark on the American entertainment scene that will not soon be equaled.

Hope made his last television appearance on November 23, 1996.

"Toward the end of his career, we began to realize that his timing was a little off. And he just started slowing down and eventually packed it in. I think he looked back and realized that he had had one of the most successful showbiz careers in history."

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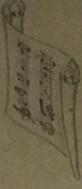
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Exhibit 23

1927

AMERICAN SOCIETY OF COMPOSERS · AVTHORS AND · PVBLISHERS



THIS CERTIFIES THAT ON June 30, 1927

Leo Robin

WAS DVLVLY ELECTED TO MEMBERSHIP

Ernest Buck
PRESIDENT

Charles K. Harris
SECRETARY

NEW YORK, U.S.A.



Exhibit 24

CITY OF LOS ANGELES



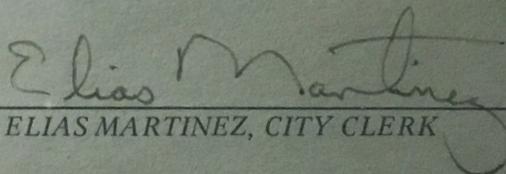
IN TRIBUTE

THE LOS ANGELES CITY COUNCIL EXTENDS ITS
DEEPEST SYMPATHY TO YOU IN THE PASSING OF
YOUR LOVED ONE

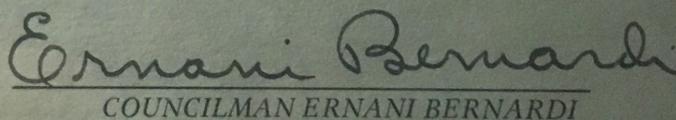
LEO ROBIN

IN WHOSE MEMORY ALL MEMBERS STOOD IN TRIB-
UTE AND REVERENCE AS THE COUNCIL ADJOURNED
ITS MEETING OF JANUARY 2, 1985.

SINCERELY,


ELIAS MARTINEZ, CITY CLERK

Presented by:


COUNCILMAN ERNANI BERNARDI

Seconded by:

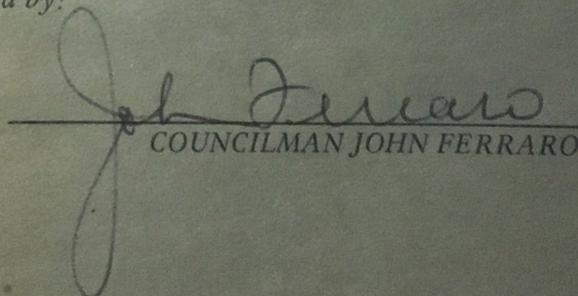

COUNCILMAN JOHN FERRARO



Exhibit 25

LEO ROBIN MUSIC

Ms. Rana Ghadban, President and CEO
Hollywood Chamber of Commerce
6255 Sunset Boulevard, Suite 150
Hollywood, CA 90028

June 18, 2021

Re: Demand for Hollywood Chamber of Commerce to Install the star of Leo Robin on the Hollywood Walk of Fame

Dear Ms. Ghadban,

It has now been 31 years since my grandfather, lyricist Leo Robin, was awarded a posthumous star on the Hollywood Walk of Fame but, unfortunately, the star was never installed. I first reached out, by a call, to the Hollywood Chamber of Commerce ("Hollywood Chamber") on July 6, 2017 after discovering on the web that my grandfather had been awarded a star because neither my family nor I knew anything about that which happened more than 27 years ago at the time.

I learned that in 1988 both my grandmother, Cherie Robin, and actor Bob Hope, sponsored Leo for a star but, sadly, my grandmother passed away more than one year before the letter from the Hollywood Chamber announcing this award was sent out and Bob Hope was never notified. On July 11, 2017, I emailed Ms. Martinez, as she'd requested, the enclosed letter, which explains all of this, to forward to the Walk of Fame Committee. I am writing to you now this Demand Letter for the Hollywood Chamber to finally honor its obligation to install the star of Leo Robin on the Hollywood Walk of Fame with a response within 10 days from the date of this letter.

Over the past nearly four years, I have attempted to work with the Hollywood Chamber regarding the star awarded to my grandfather back in 1990. In particular, I made arrangements with the Hollywood Walk of Fame to move forward with installing the star of Leo Robin and on July 19, 2018, in an overnight envelope, I sent Ms. Martinez the date I selected in 2019 for Leo's star ceremony, April 6th, his birthday, along with a check for \$4,000, the fee that my grandmother and Bob Hope, the co-sponsors, had agreed to pay when they first filled out the application back in 1988.

On July 23, 2018, the Hollywood Chamber terminated the arrangements to move forward with installing the star of Leo Robin with an unveiling ceremony when Ms. Martinez sent my letter to her back to me along with the check I'd made payable to the Hollywood Historic Trust for \$4,000 and wrote, "Dear Mr. Ora, I received your check for \$4,000 which [I] am sending back to you. The approval of Mr. Robins star lapsed many years ago. It would need to be reinstated by the Walk of Fame Committee, which will next meet in June 2019...."

Scott D. Ora, Trustee



LEO ROBIN MUSIC

I am making this demand for the Hollywood Chamber to finally honor its obligation to install the star of Leo Robin that was awarded more than 31 years ago by the 1990 Walk of Fame Committee with a traditional ceremony to accompany the unveiling of the star along with all other customary practices that take place with the award of a star.

I, as Trustee of the Leo Robin Trust, which manages all rights of lyricist Leo Robin, have previously agreed to be the sponsor and make this commitment to fulfill the sponsorship obligation of \$4,000, based on the original terms that both Cherie Robin and Bob Hope agreed to pay in 1988, to be tendered to the Hollywood Historic Trust immediately upon the Hollywood Chamber agreeing to honor its obligation in accordance with the decision made by the 1990 Walk of Fame Committee to install the star of Leo Robin with a traditional ceremony to accompany the unveiling of the star.

I hereby request a good faith response to this letter as soon as possible, but in no event later than the close of business on June 28, 2021. If by such time I have received no response from the Hollywood Chamber, I expressly reserve the right to pursue any and all available remedies, including, but not limited to, instituting formal litigation proceedings against the Hollywood Chamber.

I am enclosing the correspondence referred to above. If there are any questions regarding this Demand Letter, please contact me at (818) 618-2572 or email me at sdo007@aol.com.

Sincerely yours,


Scott Douglas Ora

Trustee of Leo Robin Music

Scott D. Ora, Trustee
