

1 LAW OFFICES OF ROBERT J. ENDERS, JR.  
2 ROBERT J. ENDERS, JR., CBN# 105652  
3 1925 Century Park East, Suite 2000  
Los Angeles, CA 90067-2721  
(310) 277-2236, (310) 552-9316 (fax)

4 Attorney for Plaintiff PROFILES IN HISTORY,  
5 a California General Partnership

52  
**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF LOS ANGELES

AUG 02 2010

John Clarke, Executive Officer/Clerk  
By ATOTY WILSON Deputy

6  
7  
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 COUNTY OF LOS ANGELES, CENTRAL DISTRICT  
10

11 PROFILES IN HISTORY, a California General  
12 Partnership,

13 Plaintiff,

14 vs.

15 THOMAS REGA, an Individual, and DOES 1-  
16 100, inclusive,

17 Defendants.

CASE NO. BC431481

**DECLARATION OF DIANE JEFFREY IN  
SUPPORT OF PLAINTIFF PROFILES IN  
HISTORY'S DEFAULT JUDGMENT  
AGAINST DEFENDANT THOMAS REGA**

Date: July 9, 2010  
Time: 8:30 a.m.  
Dept: 52

Judge: Hon. Susan Bryant-Deason

18 **UNLIMITED JURISDICTION:**  
19 **DAMAGES IN EXCESS OF \$25,000.00**

20 Plaintiff, PROFILES IN HISTORY hereby files the Declaration of Diane Jeffrey in Support of  
21 Profiles in History's Default Judgment against Defendant Thomas Rega.  
22

23 Dated: July 6, 2010

24 LAW OFFICES OF ROBERT J. ENDERS, JR.  
25 By ROBERT J. ENDERS, JR.  
26 Attorney for Plaintiff PROFILES IN HISTORY,  
a California General Partnership

1        **DECLARATION OF DIANE JEFFREY IN SUPPORT OF PLAINTIFF PROFILES IN**  
2        **HISTORY'S DEFAULT JUDGMENT AGAINST DEFENDANT THOMAS REGA**

3            1. I, Diane Jeffrey, am an adult over the age of 18, am not a party to this action, have  
4        personal knowledge of the facts stated herein, am competent to testify thereto, and if called upon, I  
5        could testify to the facts stated herein.

6            2. I am, and at all relevant times, have been the President and CEO of Studio Conservation,  
7        Inc., also known as Studio C, a company which handles conservation and restoration of paper,  
8        posters, art and other collectibles, including movie posters. My company is located at 2300 La  
9        Mirada Drive, Vista, CA 92081. Neither my company nor I is affiliated with either Plaintiff  
10       Profiles in History ("Profiles") or Defendant Thomas Rega ("Rega").  
11

12           3. In late March 2009, Rega contacted me by email about restoring a one-sheet Dracula  
13        poster. Attached as Exhibit "1" is a true and correct copy of Rega's email to me dated March 26,  
14        2009 in which he describes the Dracula poster and the portions that are missing therefrom and his  
15        wanting to recreate the missing pieces. All communications with Rega were by email.  
16

17           4. On April 7, 2009, Rega emailed me and said: "I know the poster has some issues and I  
18        don't expect it to be perfect **just looking for it to be restored and presentable for framing**".  
19        Attached as Exhibit "2" is a true and correct copy of Rega's email of April 7, 2009.  
20

21           4. On June 4, 2009, Rega again emailed me and instructed me on how he wanted the poster  
22        restored including photographs, and asking me to send him an image when the poster was complete.  
23        Attached as Exhibit "3" is a true and correct copy of Rega's email of June 4, 2009.  
24

25           5. On June 23, 2009, Rega again emailed me with further instructions to match the poster  
26        to achieve "**a closer match to the archived photo**". Attached as Exhibit "4" is a true and correct  
27        copy of Rega's email of June 4, 2009.  
28

1           6. I did the requested restoration work per Rega's specifications and instructions and  
2 returned the poster to Rega. I believe that Rega had additional work done to the Dracula poster by  
3 another restorer before he consigned it to Profiles – I am not certain as to the identity of the  
4 subsequent restorer. At no time did Rega advise me that he intended to represent the Dracula poster  
5 as an authentic original or sell it to the public. I relied on his April 7, 2009 email (Ex. "2") as  
6 indicative that Rega simply wanted the poster "presentable for framing".  
7

8           7. I was shocked to learn that Rega had consigned the Dracula poster to Profiles and that the  
9 poster was being represented as an original and profoundly rare poster with no indication of  
10 restoration – sufficiently rare to put on Profiles' cover of their auction catalog.  
11

12           8. Since then, my company has been sued by Rega in New Jersey for interference with  
13 contract (between Profiles and Rega) and defamation as to what I am alleged by Rega to have  
14 informed Profiles about the Dracula poster and the history of the restorations and Rega's  
15 instructions as set forth in the above emails. My company is currently defending that lawsuit.  
16

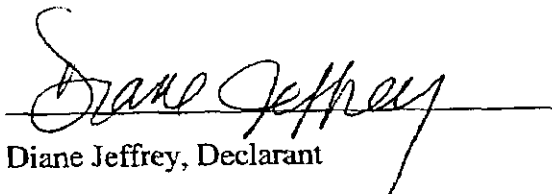
17           9. I declare under the penalty of perjury under the laws of the State of California that the  
18 foregoing is true and correct and that this Declaration was executed on July 6, 2010 at Vista,  
19 California.  
20

21 \_\_\_\_\_  
22 Diane Jeffrey, Declarant  
23  
24  
25  
26  
27  
28

restoration -- sufficiently rare to put on Profiles' cover of their auction catalog.

8. Since then, my company has been sued by Rega in New Jersey for interference with contract (between Profiles and Rega) and defamation as to what I am alleged by Rega to have informed Profiles about the Dracula poster and the history of the restorations and Rega's instructions as set forth in the above emails. My company is currently defending that lawsuit.

9. I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this Declaration was executed on July 6, 2010 at Vista, California.

  
Diane Jeffrey, Declarant

8/2/16

EXHIBIT 1



**From:** studioc.ca@sbcglobal.net (studioc.ca@sbcglobal.net)  
**To:** enderslaw@sbcglobal.net;  
**Date:** Wed, January 27, 2010 12:24:11 PM  
**Cc:**  
**Subject:** Fw: Studio C

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

**From:** alltimehorror@gmail.com  
**To:** studioc.ca@sbcglobal.net  
**Sent:** Thursday, March 26, 2009 6:08 PM  
**Subject:** Re: Studio C

Hi Diane,

Here are the photos of two posters I would like to have restored. (see attachments) The first one is a 51 half sheet movie poster (22"x28") that appears to had some old restoration work done to the lower corners which is very noticeable especially on the back, there is a white shaded corner that looks like paint. ( can it be redone so that it is not so noticeable)? I'm not sure if the poster once had some paper loss to the corners or it was done to repair a tear or bent corner.

I would like it to be redone . It only needs restoration work done to the two lower corners (no backing) as the rest of the poster is perfect.

The other one is a Dracula one sheet poster (27"x41") that was previously attached to a backing and removed which caused some additional paper loss especially to the lower corners. This poster I would like to be linen backed as is, with no bleaching or cleaning as paper is somewhat brittle. I would also like for the missing paper to be replaced, holes/rips fixed, fold line touch-ups and also re-create the missing pieces as part of the (country of origin USA) words and border numbers are missing. The image itself is 95% intact and fairly clean with mostly border chips/damage.

Please send me a price quote for each poster to be restored and also let me know if you require payment before or after the work is done and how long it would take to complete.

Thanks,  
Tom

On Thu, Mar 26, 2009 at 12:51 PM, <studioc.ca@sbcglobal.net> wrote:

Hi Tom - Thank you for contacting Studio C. I can give you a price range based on photos. Send them to this email address, and I will be happy to take a look and give you the info.

Thanks  
Diane  
Studio C



7/6/2010 7:57 PM

2/2/10

EXHIBIT 2



**From:** studioc.ca@sbcglobal.net (studioc.ca@sbcglobal.net)  
**To:** enderslaw@sbcglobal.net;  
**Date:** Wed, January 27, 2010 12:26:30 PM  
**Cc:**  
**Subject:** Fw: Studio C

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

**From:** [alltimehorror@gmail.com](mailto:alltimehorror@gmail.com)  
**To:** [studioc.ca@sbcglobal.net](mailto:studioc.ca@sbcglobal.net)  
**Sent:** Tuesday, April 07, 2009 2:46 PM  
**Subject:** Re: Studio C

Hi Diane,

The only history that I have on the piece is that it was once cleaned and attached to a board and then removed because of bubbles which caused more damage to the back and borders and made the poster stiff and brittle. However, I don't know what type of backing was used. About the NSS writing and based on other posters that I have from the same period, the poster shouldn't have any NSS writing on it, only should have country of origin bottom left and numbers on the bottom right border.

I know the poster has some issues and I don't expect it to be perfect just looking for it to be restored and presentable for framing. The other posters I'm sending you are in better condition.

Thanks,  
Tom

On Tue, Apr 7, 2009 at 2:43 PM, <[studioc.ca@sbcglobal.net](mailto:studioc.ca@sbcglobal.net)> wrote:

Hi Tom - I received the poster and have looked at it. Can you give me a little history on the piece. It seem to be of much thicker paper than normal posters. It could have been glued to something and when it was removed a layer of paper remained. Also, it seem the NSS writing has been removed, along with other writing in the border.

Please advise.

Thanks  
Diane  
Studio C

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

**From:** [alltimehorror@gmail.com](mailto:alltimehorror@gmail.com)  
**To:** [studioc.ca@sbcglobal.net](mailto:studioc.ca@sbcglobal.net)  
**Sent:** Tuesday, March 31, 2009 5:40 PM  
**Subject:** Re: Studio C

Hi Diane,



7/6/2010 8:00 PM



I sent the one sheet poster out to you Priority Mail, you should receive it in a about 2-3 days. I also included a check for the deposit in the amount of \$150.00. You will find it in a white envelope inside the package. Please let me know when your ready for the balance.

I also have a 1979 Alien advance one sheet poster that I want to send to you, the poster is rolled and has an upper and lower border tear about an inch long with a few light creases in the image area.

Just needs the two tears repaired and some restoration work done to the creases.

On Tue, Mar 31, 2009 at 2:28 PM, <[studioc.ca@sbcglobal.net](mailto:studioc.ca@sbcglobal.net)> wrote:

It Is:

Studio C

2330 LaMirada Drive

Suite 400

Vista, CA 92081

Thanks

Diane

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

**From:** [alltimehorror@gmail.com](mailto:alltimehorror@gmail.com)

**To:** [studioc.ca@sbcglobal.net](mailto:studioc.ca@sbcglobal.net)

**Sent:** Tuesday, March 31, 2009 10:45 AM

**Subject:** Re: Studio C

Hi Diane,

Please confirm your mailing address.

Thanks

On Fri, Mar 27, 2009 at 6:16 PM, Diane Jeffrey <[studioc.ca@sbcglobal.net](mailto:studioc.ca@sbcglobal.net)> wrote:

Will do and thanks so much.

Diane

Studio C

--- On Fri, 3/27/09, [alltimehorror@gmail.com](mailto:alltimehorror@gmail.com) <[alltimehorror@gmail.com](mailto:alltimehorror@gmail.com)> wrote:



7/6/2010 8:00 PM

From: [alltimehorror@gmail.com](mailto:alltimehorror@gmail.com) <[alltimehorror@gmail.com](mailto:alltimehorror@gmail.com)>  
Subject: Re: Studio C  
To: [studioc.ca@sbcglobal.net](mailto:studioc.ca@sbcglobal.net)  
Date: Friday, March 27, 2009, 2:28 PM

Hi Diane,

I'll send you one of the posters next week. The one sheet I'll send folded and the half sheet I'll have to send flat in a large box. Please let me know when you receive it and I'll send payment.

Thanks,  
Tom

On Fri, Mar 27, 2009 at 4:01 PM, Diane Jeffrey  
<[studioc.ca@sbcglobal.net](mailto:studioc.ca@sbcglobal.net)> wrote:

Hi Tom - Thank you for sending the images. Looks like the price for the half sheet would be in the \$75 to \$125 range, which includes the 2 bottom corners. We can redo/remove any paint that is not right. I want to make sure there is no trace of any mold on the reverse, as the staining looks like it might be water damage. The one sheet would be in the \$200 to \$250 price range, which includes cleaning, deacidification, linenbacking, repair and touchup. We will add any writing required in the missing border area.

We require a deposit to start the work and the balance before shipping. Our turn around time is about 3 weeks right now, unless you need something sooner.

Please let me know if you have any questions and if we can help you at this time.

Diane  
Studio C

--- On Thu, 3/26/09, [alltimehorror@gmail.com](mailto:alltimehorror@gmail.com)  
<[alltimehorror@gmail.com](mailto:alltimehorror@gmail.com)> wrote:

From: [alltimehorror@gmail.com](mailto:alltimehorror@gmail.com) <[alltimehorror@gmail.com](mailto:alltimehorror@gmail.com)>  
Subject: Re: Studio C  
To: [studioc.ca@sbcglobal.net](mailto:studioc.ca@sbcglobal.net)  
Date: Thursday, March 26, 2009, 7:08 PM



Hi Diane,

Here are the photos of two posters I would like to have restored. (see attachments) The first one is a 51 half sheet movie poster (22"x28") that appears to had some old restoration work done to the lower corners which is very noticeable especially on the back, there is a white shaded corner that looks like paint. ( can it be redone so that it is not so noticeable)? I'm not sure if the poster once had some paper loss to the corners or it was done to repair a tear or bent corner.

I would like it to be redone . It only needs restoration work done to the two lower corners (no backing) as the rest of the poster is perfect.

The other one is a Dracula one sheet poster (27"x41") that was previously attached to a backing and removed which caused some additional paper loss especially to the lower corners. This poster I would like to be linen backed as is, with no bleaching or cleaning as paper is somewhat brittle. I would also like for the missing paper to be replaced, holes/rips fixed, fold line touch-ups and also re-create the missing pieces as part of the (country of origin USA) words and border numbers are missing. The image itself is 95% intact and fairly clean with mostly border chips/damage.

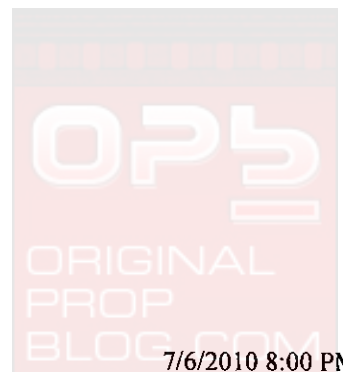
Please send me a price quote for each poster to be restored and also let me know if you require payment before or after the work is done and how long it would take to complete.

Thanks,  
Tom

On Thu, Mar 26, 2009 at 12:51 PM, <[studioc.ca@sbcglobal.net](mailto:studioc.ca@sbcglobal.net)> wrote:

Hi Tom - Thank you for contacting Studio C. I can give you a price range based on photos. Send them to this email address, and I will be happy to take a look and give you the info.

Thanks  
Diane  
Studio C



7/6/2010 8:00 PM

8/22/10



**From:** studioc.ca@sbcglobal.net (studioc.ca@sbcglobal.net)  
**To:** enderslaw@sbcglobal.net;  
**Date:** Wed, January 27, 2010 12:27:53 PM  
**Cc:**  
**Subject:** Fw: Drac 1sht lower border info.

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

**From:** [alltimehorror@gmail.com](mailto:alltimehorror@gmail.com)  
**To:** [studioc.ca@sbcglobal.net](mailto:studioc.ca@sbcglobal.net)  
**Sent:** Thursday, June 04, 2009 7:12 PM  
**Subject:** Drac 1sht lower border info.

Hi Diane,

I wasn't sure if you received this message so just in case you haven't received it, here it is again.

I was looking around for pictures of the poster and the closest I could find is this Dracula style F which is the same poster only a different style image with the same writing on the lower border.

Lower left should be " COUNTRY OF ORIGIN U.S.A. " (in small print) and the lower right border numbers appear to be 36312 (also in small print)

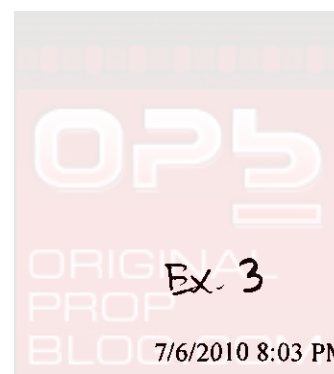
I attached two photos, they are not very clear, however, it should give you an idea of where the writing once was.

Please let me know if you can work off these images? I'm still looking for a better image... I'll let you know if I find something more clear.

Please send me an image when the poster is complete.

Thanks,  
Tom

01/01/10



8/0/10



**From:** studioc.ca@sbcglobal.net (studioc.ca@sbcglobal.net)  
**To:** enderslaw@sbcglobal.net;  
**Date:** Wed, January 27, 2010 12:28:25 PM  
**Cc:**  
**Subject:** Fw: Drac 1sht lower border info.

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

**From:** [alltimehorror@gmail.com](mailto:alltimehorror@gmail.com)  
**To:** [studioc.ca@sbcglobal.net](mailto:studioc.ca@sbcglobal.net)  
**Sent:** Tuesday, June 23, 2009 12:50 PM  
**Subject:** Re: Drac 1sht lower border info.

Hi Diane,

The lower left side looks great..Could you make the numbers on the right side slightly smaller and bolder, also, could you slightly reduce and fill in the # sign to make it appear more like a dot? It will be a closer match to the archived photo that represents the way it was.

If you can ship the poster it to me USPS Express Mail this Thursday that will be great as I will be home all day on Friday to sign for it.

Thanks,  
Tom

On Mon, Jun 22, 2009 at 6:29 PM, <[studioc.ca@sbcglobal.net](mailto:studioc.ca@sbcglobal.net)> wrote:

Here is a pic Let me know.

Thanks  
Diane  
Studio C

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

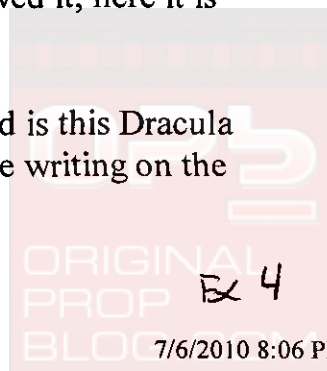
**From:** [alltimehorror@gmail.com](mailto:alltimehorror@gmail.com)  
**To:** [studioc.ca@sbcglobal.net](mailto:studioc.ca@sbcglobal.net)  
**Sent:** Thursday, June 04, 2009 8:12 PM  
**Subject:** Drac 1sht lower border info.

Hi Diane,

I wasn't sure if you received this message so just in case you haven't received it, here it is again.

I was looking around for pictures of the poster and the closest I could find is this Dracula style F which is the same poster only a different style image with the same writing on the lower border.

→  
→



Lower left should be " COUNTRY OF ORIGIN U.S.A. " (in small print) and the lower right border numbers appear to be 36312 (also in small print)

I attached two photos, they are not very clear, however, it should give you an idea of where the writing once was.

Please let me know if you can work off these images? I'm still looking for a better image... I'll let you know if I find something more clear.

Please send me an image when the poster is complete.

Thanks,  
Tom

05/07/0



7/6/2010 8:06 PM