

1 PETER MICHAEL SLOAN
2 AKA PETER SHATNER
3 2226 SOHO BAY COURT
4 TAMPA, FLORIDA
5 908-319-2343
6 peter@petershatner.com

7 IN THE CIRCUIT COURT OF THE THIRNTEENTH CIRCUIT
8 HILLBOROUGH COUNTY

9 PETER MICHAEL SLOAN
10 AKA PETER SHATNER,
11 Plaintiff,

12 vs.

13 WILLIAM SHATNER;
14 CHERRY HEPBURN;
15 PUTAM & HEPBURN;
16 PAUL CAMUSO;
17 THE SHATNER PROJECT;
18 IMBDPRO;
19 TWITTER;
20 AMAZON.COM; ET AL

21 Defendant's

Case No.: 16-CA-2821

DIV F

LIBEL; DEFAMATION; TORTIOUS
INTERFERENCE; SLANDER

HILLSBOROUGH COUNTY, FLA
COURTY DIVE

2016 MAR 25 PM 12: 29

FILED
CLERK CIRCUIT COURT

22 **Now comes the Plaintiff, Peter Michael Sloan AKA Peter Shatner and states the following:**

23 *In November of 1984, Peter Michael Sloan met with William Shatner on the set of T.J. Hooker in Burbank*
24 *California for the purpose of discussing The Plaintiff's paternity. The Defendant admitted the he was the*
25 *Plaintiff's father and invited him to the set the following week. The Plaintiff spent the day with William*

LIBEL; DEFAMATION; TORTIOUS INTERFERENCE; SLANDER - 1

1 *Shatner again who introduced him to the crew. Upon the Plaintiff's return to his residence in New Jersey,*
2 *The Plaintiff called William Shatner at his home in California utilizing the number supplied to him by the*
3 *Defendant. The Defendant became agitated and hung-up the phone. Several days later, a person by the*
4 *name of David Brody called the Plaintiff at his office and stated that he apologized for Mr. Shatner's*
5 *behavior on the phone, days before, but that he (The Defendant William Shatner) wanted to reach-out to*
6 *the Defendant to say the "he feels for you," but that The Defendant "can't respond." Further, Mr. Brody*
7 *explained that The Defendant's "lack of acknowledgement" stemmed from the fact that The Plaintiff (at*
8 *that time) was an adult and that if The Plaintiff were a "minor" or if Mr. Shatner had a "paternal instinct,"*
9 *things might be different.*

10
11 *Mr. Brody continued on behalf of The Defendant and stated that, Mr. Shatner is "totally denying paternity*
12 *at this point," and Mr. Brody said, "Don't go public" with this or it "could be horrendous for" The Plaintiff*
13 *and the Defendant, William Shatner. The Plaintiff suggested a DNA test but was rebuffed.*

14
15 *On or about January 9, 2009, The Plaintiff Peter Michael Sloan, registered the web domain*
16 *www.petershatner.com for the purpose of creating a nom de plume (pen name) to author his book "The*
17 *Search," about The Defendant's search for his natural parents.*

18
19 *In 2011, The Plaintiff began a radio show under the stage name of "Peter Shatner" on CBS Radio*
20 *1010AM.*

21
22 *On October 11, 2011 an article appeared in the Sarasota Herald Tribune about the Plaintiff Peter Shatner*
23 *(Peter Sloan) regarding his affiliation with Savtira Corporation. The Plaintiff was contacted by Eric Hyman,*
24 *of Loeb & Loeb. During several discussions with Mr. Hyman The Plaintiff requested that Mr. Hyman ask*
25 *the Defendant, William Shatner to take a DNA test.*

LIBEL; DEFAMATION; TORTIOUS INTERFERENCE; SLANDER - 2

1 On November 7, 2011, The Plaintiff received a letter from The Defendant William Shatner's attorney Eric
2 Hyman, from the firm Loeb & Loeb in Los Angeles. Mr. Hyman wrote the letter below to The Plaintiff,
3 emailed to: peter@petershatner.com and addressed to:

4
5 Peter Shatner

6 808 North Franklin Street

7 Unit 3112

8 Tampa, Florida 33606

9
10 which stated:

11
12 "Dear Peter:

13 I had another conversation with Bill, who confirmed to me once again that he is not your father. There
14 have been many people over the years who have claimed to be his children or other relatives. He is an
15 incredibly busy, eighty year-old man, and is not interested in spending time discussing this issue with you
16 or any such individuals.

17
18 All of your actions (including the use of my client's valuable name and likeness without his approval) are
19 at your own risk.

20
21 Very truly yours,

22
23 Erik Hyman

24 Partner"

1 In 2012, The Plaintiff registered a script entitled: "T.C. Therapeutic Community" with The Writer's Guild of
2 America by the stage name, "Peter Shatner."

3
4 From 2011 through 2015 the Plaintiff spent time developing a production of his script through IMDBpro a
5 division of Amazon.com.

6
7 **CAUSES OF ACTION**

8
9 1.) On May 9, 2015, an article was published in The Tampa Tribune which described The Plaintiff's
10 story. Contained within the article was a quote from The Defendant's publicist, Cherry Hepburn,
11 Principal from the firm Hepburn & Smith, 15915 Ventura Blvd., Suite 101, Encino, California
12 91436 which is quoted in that article as follows:

13 "Mr. Shatner has 3 lovely daughters but NO son," Shatner's publicist Cherry Hepburn told the Tribune
14 in an email. "This person has fraudulently portrayed himself as Mr. Shatner's son for years."

15 - See more at: [http://www.tbo.com/lifestyle/kirks-kin-tampa-man-says-hes-william-shatners-son-
16 20150509/#sthash.TBTGGABF.dpuf](http://www.tbo.com/lifestyle/kirks-kin-tampa-man-says-hes-william-shatners-son-20150509/#sthash.TBTGGABF.dpuf)

17
18 2.) On or about May of 2015, The Defendant, William Shatner's Social Media Director, and part of
19 "The Shatner Project" The Defendant, Paul Camuso posted malicious, libelous and slanderous
20 statements about the Plaintiff on Facebook and Twitter here is an example of one of the multiple
21 attacks on The Plaintiff by Mr. Camuso who is an agent of The Defendant William Shatner:

22
23 "There was a long and involved discussion about Peter's claim on The Official William Shatner. com
24 group. Paul Camuso's comment: I removed the Peter Sloan (aka Shatner) thread. He is NOT Mr.
25 Shatner's son.

1 **Here's what I know:**

2 **The only photos he has are from a convention (where he and his daughter paid to get a photograph**
3 **with Bill.) And then last year he and his daughter encountered Bill backstage at an event in FL and**
4 **got a photo.**

5 **His story: "The Search" is full of holes. Everyone else who "helped" this guy discover he was Bill's**
6 **"son" is deceased.**

7 **Even his story has changed. Originally he said he contacted Bill's manager who invited him down to**
8 **the TJ Hooker set in Long Beach. Then Bill's manager said that never happened so that part of the**
9 **story changed. Now he met met Bill at the Burbank Studios. The Burbank Studios are new- maybe 5**
10 **years old; TJ Hooker was filmed at the WB (in Burbank.) So this guy doesn't even know where he met**
11 **Bill.**

12 **So you are going to meet your long lost dad, don't you take a camera? Where are those photos?**
13 **They don't exist because the story is made up.**

14 **His daughter Ann (one of his 6 kids) tried to bully Bill on Twitter last year; Bill blocked her so she had**
15 **her friends start harassing Bill.**

16 **IMDB even removed his biography because it was ridiculous**

17 **Original: <https://web.archive.org/.../http://www.imdb.com/name/nm3421029/>**

18 **Current: <http://www.imdb.com/name/nm3421029/>**

19 **Even on his IMDB profile he has this picture of a billboard for his radio show: it's a fake image.**

20 **Compare it to this image: <https://lh3.googleusercontent.com/.../3cff8d92-d908-4cc0-b4fe...>**

21 **It's a mock up you use to be able to do on the CBS Outdoors Advertising website.**

22 **It's all a big con game for fame so that's why we don't bother with Mr. Sloan."**

23
24 **3.) Twitter shut-down the Peter Shatner twitter account permanently claiming:**
25

1 "Hello,

2
3 *It has come to our attention that your Twitter account is in violation of the Twitter Rules, specifically*
4 *the policy on Impersonation: <http://support.twitter.com/entries/18366-impersonation-policy>.*

5
6 *Impersonation is pretending to be another entity in order to deceive, and is strictly prohibited. This*
7 *account has been suspended and will not be restored.*

8 *Thanks,*

9
10 *Twitter"*

11
12 *4.) In July of 2015, The Plaintiff's IMDBpro account was shut down, after which the Plaintiff posted*
13 *the following message to IMDB Pro:*

14
15 *I pay for IMDBpro and yet someone at IMDBpro erased my project T.C. Therapeutic Community off*
16 *the site after 6 months of work and 6,000 submissions, the dashboard still exists but the project has*
17 *been erased. This is a viable project and IMDBpro advertises this service.*

18
19 *Also IMDBpro has removed my biography.*

20
21 *I am accumulating damages every day as a direct result of the actions of IMDBpro and it's parent*
22 *amazon.com.*

23
24 *Peter Shatner*

1 **IMDBpro responded:**

2
3 **Peter:**

4
5 **As per the response you have received earlier, IMDBpro's longstanding policies related to future**
6 **titles are well documented and can be found**

7 **here: [http://www.imdb.com/help/show leaf?titlesinproduction](http://www.imdb.com/help/show_leaf?titlesinproduction) – please be aware that being a paid**
8 **subscriber to IMDbPro.com has no bearing on whether a title will be accepted or kept on the site.**

9 **The decision is based exclusively on the information/data presented to us and on our ability to**
10 **verify its accuracy.**

11
12 **Titles, particularly those that are submitted as future unreleased projects, are routinely removed**
13 **when our editors can't verify that they still fulfill our requirements to be listed. If you believe that**
14 **the title is eligible to be listed and are able to verify that it meets the eligibility criteria outlined in**
15 **the above documentation, please feel free to resubmit it. Resubmitting it along with third-party**
16 **sources verifying that it is active and that there is a reasonable expectation that it will be made**
17 **and released in the near future, is all we need to list it.**

18
19 **Likewise, biographical information can be changed or removed if we are unable to verify its**
20 **accuracy, or we determine that it's inaccurate. If you believe that such removal may have**
21 **occurred by mistake, you should resubmit the data along with links to source verifying its**
22 **accuracy, and our editors will me more than happy to review it and revisit, if applicable, their**
23 **decision.**

24
25 **Thank you.**

1 *old over the years. I mean, he's in his sixties isn't he, something like that?*

2 Calta

3 *Yes! So he's not your son? I'm glad I didn't buy into it.*

4 Shatner

5 *No, no, no...I ahh..*

6 Calta

7 *I would assume that a man of your stature probably had, may have a couple of kids lying around*
8 *that you weren't sure of around the country...*

9 Shatner

10 *Yeah but they're lying around, they're not a..on the radio station.*

12 Calta

13 *I..look, look if I looked like you, and I was on the radio I'd use that is a gimmick... I'm Shatners kid,*
14 *you know? Hah...anyway...okay so he's not...so when I see him this guy I should call him out on*
15 *BS?*

16 Shatner

17 *Yeahh...I mean...do..a..wa.. I don't know what he's doing, or why he's doing that. It may be*
18 *a...need on his part but he's been at it for quite a while.*

19 Calta

20 *No kiddin' I thought you were going to go, "Yeah, I did you know a.. his mother you know and*
21 *blah blah blah... I would imagine you..you in your day..um. I would imagine..so now...*

22 Shatner

23 *That would have to be... that would have to take me back to Canada and me as a kid and a...a*
24 *you know.a..wa... I don't know what he's doing.*

25 Calta

1 (Gafah)

2 Shatner

3 *I...I...I..eh..I sympathize with him...in this...whatever his needs are.*

4 Calta

5 *Oh...n..oh you're right, that becomes a sad situation now...um..okay...*

6 Shatner

7 *That's the way I...I..um that's the way I'm taking it.*

8

9 **DAMAGES INCURRED BY THE PLAINTIFF**

10 As a direct result of the Defendant(s) malicious behavior, and malfeasance, The Plaintiff has incurred
11 damages.

- 12
- 13 1.) The Plaintiffs loss of the production of the film: T.C. Therapeutic Community by direct actions of
14 all of the Defendant(s) who sought to destroy the reputation of The Plaintiff.
- 15
- 16 2.) Loss of the ability to earn income from the use of the name Peter Shatner, which has been The
17 Plaintiff's "Brand" since 2009.

18

19 **RELEIF SOUGHT BY THE PLAINTIFF**

- 20
- 21 1.) The Plaintiff asks that The Court grant Injunctive relief to demand that the Defendant(s) cease
22 and desist from further claims that the Plaintiff is not the natural child of William Shatner.
- 23
- 24 2.) The Plaintiff asks that The Court grant Declaratory relief by directing Mr. Shatner to submit to a
25 DNA test with The Plaintiff to confirm paternity.

1 3.) The Plaintiff asks that The Court grant Compensatory damages in the amount of \$30,000,000.00.

2
3 4) The Plaintiff asks that The Court grant Punitive damages in the amount of \$90,000,000.00.

4
5 5) The Plaintiff asks that The Court grant \$50,000,000.00 for Pain and Suffering inflicted upon The
6 Plaintiff.

7
8 6) The Plaintiff asks for reimbursement of funds paid or lost as a result of the actions of the
9 Defendant(s)

10
11 7.) Attorneys' fees together with costs of this lawsuit.

12
13 8.) The Plaintiff asks The Court for any other type of relief such as The Court deems necessary.

14 9.) *The Plaintiff Demands a Jury Trial*

15
16
17 Dated this 25 of March, 2016.

18 
19 Peter Michael Sloan AKA Peter Shatner