

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

HALEIGH BREEST,

Plaintiff,

-against-

PAUL HAGGIS,

Defendant.

Index No.: 161137/2017

**Motion Sequence No. 17**

**PLAINTIFF'S MEMORANDUM OF LAW IN OPPOSITION TO  
DEFENDANT'S MOTION TO UNSEAL**

**EMERY CELLI BRINCKERHOFF & ABADY LLP**

600 Fifth Avenue, 10<sup>th</sup> Floor  
New York, New York 10020  
(212) 763-5000

circuit” at various high-end New York City events, “smoking and chatting with models”—one of whom “lay across him and he hugged her and kissed her on the forehead.”<sup>5</sup> That story contains quotes from *Haggis’s* lawyer (but not Plaintiff’s). Nor can Haggis blame his allegedly dwindling finances or burgeoning attorneys’ fees on anyone but himself. He made the choice to file this expensive, baseless, and unnecessary motion—and several others besides—for the *sole purpose* of smearing Plaintiff in the press by leveraging mischaracterizations of her personal documents.

And Plaintiff is not the one who has “misled” the public. Chaudhry Aff. ¶ 3. Haggis’s own confidential documents reveal that it is he—not Ms. Breest—who has outright lied in the press. Since the beginning of this lawsuit, Haggis’s attorneys have repeatedly and speciously claimed that the Church of Scientology funded or supported Plaintiff’s claims against Haggis—and the multiple other women who have submitted sworn testimony that Haggis assaulted them, too.<sup>6</sup> Haggis’s confidential documents show that his lawyers have spread this fiction since the very beginning, seeking maximum publicity for their fake news. *See Salzman Aff., Ex. B.*

Even on this motion, Haggis claims Ms. Breest is supported by “powerful interests.” Chaudhry Aff. ¶ 3. This outlandish claim is false. *Haggis knows it is false.* Ms. Breest swore under oath that she has no connection to the Church of Scientology and received no funding for this case from the Church of Scientology—or from anyone else. *See Salzman Aff., Ex. C* at Nos. 1, 3, 5, 9. There is no evidence that Ms. Breest, or any of Haggis’s other victims,

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<sup>5</sup> Page Six Team, *Paul Haggis hits party circuit amid rape accusation*, Page Six (June 27, 2019, 8:16 P.M.), <https://pagesix.com/2019/06/27/paul-haggis-hits-party-circuit-amid-rape-accusations/>.

<sup>6</sup> *See, e.g.*, Alanna Vagianos, *3 More Women Accuse Director Paul Haggis Of Sexual Harassment and Rape*, HuffPost (Jan. 5, 2018, 4:28 P.M.), [https://www.huffingtonpost.com/entry/3-more-women-accuse-director-paul-haggis-of-sexual-harassment-and-rape\\_us\\_5a4fd72fe4b01e1a4b14fa9](https://www.huffingtonpost.com/entry/3-more-women-accuse-director-paul-haggis-of-sexual-harassment-and-rape_us_5a4fd72fe4b01e1a4b14fa9); Dominic Pattern, *Leah Remini Hints Scientology Behind Paul Haggis Claims; Church Slams ‘Reprehensible Smokescreen’*, Deadline (Jan 15, 2018, 4:00 P.M.), <https://deadline.com/2018/01/leah-remini-defends-paul-haggis-open-letter-sexual-assault-claims-scientology-1202243506/>; Marlow Stern, *Is Scientology Behind the Paul Haggis Rape Allegations?*, Daily Beast (Dec. 23, 2018, 6:09 A.M.), <https://www.thedailybeast.com/is-scientology-behind-the-paul-haggis-rape-allegations?ref=scroll>.

ever received any financial or other support from the Church of Scientology. If Haggis had any such evidence, he would already have plastered it all over the press.

But it is not just Ms. Breest's sworn statements that give the lie to Haggis's outrageous Scientology claims. *In a document Haggis marked confidential and keeps sealed* from public view, Haggis admitted *he has no idea* whether the Church is even tangentially involved in this matter. In an email to friends and colleagues, Haggis wrote of his Scientology conspiracy theory: "**Who the fuck knows if it is the case?**" (emphasis added). Salzman Aff., Ex. D. This is one of many damning admissions that Haggis designated confidential in this case and seeks to keep sealed so that he can continue to lie to the press and the public.

This blunt statement says it all. Haggis made this concession privately to friends more than eighteen months ago in January 2018. But to this very day, Haggis directs his attorneys to trumpet his Scientology lies in the press. It is *this* document, not Plaintiff's private text messages, that should be shown to the world. It is *Haggis's* statements to the press, not Plaintiff's, that are fabricated. That Haggis seeks wide disclosure of Plaintiff's confidential documents while concealing outright lies in his own is the height of hypocrisy.

The only reason Haggis filed this motion is to obtain more ammunition for his ongoing media war against Plaintiff, and to feed the public yet more deceit. It is no coincidence that large swaths of the Chaudhry Affirmation have nothing whatsoever to do with the text messages Haggis wants to publicize and instead focus on slurs against Plaintiff and her counsel. As has always been the case, these tactics reflect Haggis's efforts to do something—anything—to distract from the devastating allegations leveraged against him by Breest, and by the four Jane Does who (to date) have now testified under oath. This Court must not enable Haggis's improper, offensive, and baseless tactics.