

ELIZABETH BOYCE, being duly sworn, deposes and says:

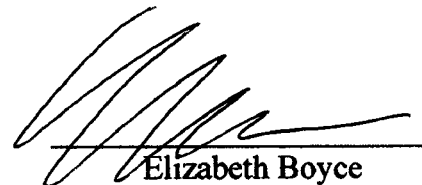
1. I am Cameron Boyce's mother. My family and I suffered a deep and grievous loss when Cameron unexpectedly passed away in 2019, only 20 years old, far too young.

2. We were aggrieved yet again when we learned about the allegations made in this lawsuit, brought by William Coakley regarding Cameron's last film, *Runt*. Mr. Coakley does not speak for Cameron. In fact, I don't think that Mr. Coakley has the right to speak for Cameron, and I hope that the Court will not let Mr. Coakley do that.

3. Based on what I saw and heard, Cameron thoroughly enjoyed making the film *Runt*. He had professional relationships with everyone on the set, including Nicole Berger and her mother, Chrysanthi Berger, who was on-set as guardian to her daughter. Both Cameron and Nicole were members of SAG-AFTRA, which requires minors to have a guardian present at all times. It was obvious to everyone that Nicole was a minor, which was the very reason why her mother was on the set with her at all times. Cameron was highly supportive of Nicole as an actor on set and on social media; they had a warm and appropriate working relationship with excellent communication between them.

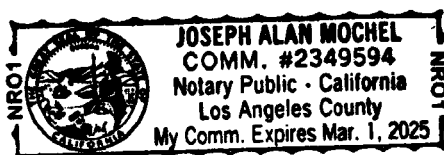
4. Based, again, on what I saw and heard, Cameron was not subjected to any "bullying, harassment, sexual harassment and coerced sexual misconduct," to quote Mr. Coakley's claims. In particular, Cameron was not "coerced" or "forced" into a brief kissing scene with Nicole. The script of *Runt* called for a kiss between the two actors, who were cast as high-school students. The scene was entirely appropriate to the plot and the themes of the film. The scene was performed and shot in a completely professional way. I do hope that the Court will watch that scene (and, time permitting, the entirety of *Runt*). I believe that no objective viewer would

regard the kiss or the scene as "sexual," much less as "sexual misconduct" or "coerced sexual misconduct." The kiss can best be described as clean and wholesome.


Elizabeth Boyce

Sworn to before
me this day of June, 2022

Notary Public



A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California, County of LOS ANGELES

Subscribed and sworn to (or affirmed) before me

on this 6th day of JUNE, 2022

by ELIZABETH BOYCE

proved to me on the basis of satisfactory evidence

to be the person(s) who appeared before me.

Signature: 

WORD COUNT CERTIFICATION

Kenneth A. Caruso, an attorney admitted to practice before the New York State Courts, certifies, in accordance with and pursuant to Section 208.8-b of the Uniform Civil Rules For The Supreme Court, that the foregoing Affidavit in Support of the Defendants' Motion to Dismiss dated June 8, 2022, contains 352 words, exclusive of the caption and signature block, and the certification as to the foregoing relies upon the word count feature of the word-processing system used to prepare the document, Microsoft Word.

Dated: North Haven, New York
June 8, 2022

/s/ Kenneth A. Caruso
Kenneth A. Caruso