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FILED

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WILLIAM G. SHARP, County Clerk

*D. Cameron*  
BY D. CAMERON, DEPUTY

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES

JUDY LEE STEARNS,

No. D 730 552

Plaintiff,

FURTHER ANSWERS TO INTERROGATORIES

vs.

BERNIE LAZAR HOFFMAN,

Defendant.

Defendant, BERNIE LAZAR HOFFMAN, further answers the  
interrogatories served on him by plaintiff, JUDY LEE STEARNS, as  
follows:

5. Q. Have you ever had sexual relations with the  
plaintiff?

A. I have never had normal sexual relations with  
the plaintiff.

15. Q. Give your exact address for each place that  
you resided during the time from January 1, 1965 to September 30,  
1965. In so doing, specify the exact address, if known, the  
exact apartment number, if known, and the approximate dates  
that you resided at each place.

A. My official address from January 1, 1965 to  
July 31, 1965, was 1523 North McGadden Place, Apartment 207,

1 Hollywood, California, with the woman I was married to at the time.  
2 For approximately three months during that time, I went to San  
3 Francisco for one trip but I have been unable to verify the address  
4 where I stayed during that time and I am, at this time, unable to  
5 be more precise as to the exact dates that I was in San Francisco.  
6 Also, during that time, I took trips to Las Vegas (staying, I  
7 believe, at the Sands Hotel and Desert Inn) and Montana, the exact  
8 dates for which I am unable, at this time, to verify, nor am I able  
9 at this time to indicate the addresses where I stayed. I also  
10 stayed with Hy Moss in Oxnard during part of this time, the exact  
11 dates and location are unknown to me at this time. From August 1,  
12 1965 through September 30, 1965, my official address was 1515 Las  
13 Vegas Boulevard, South Las Vegas, Nevada.

14 24. (1) Q. Do you know of or have you heard of any man  
15 who claims or who has claimed to have had sexual intercourse with  
16 plaintiff between June 1 and September 30, 1965?

17 A. Yes.

18 (a.) Q. If so, what are their full names, addresses  
19 and telephone numbers?

20 A. I am unable, at this time, to provide their  
21 names, addresses and telephone numbers.

22 (b.) Q. If so, what is the source of your information?

23 A. Plaintiff has told me, on numerous occasions,  
24 that she has lived with many men and she has stated that many people  
25 know about this.

26 25. Q. Do you now claim that you are disabled and  
27 unable to work?

28 A. Yes.

29 (a.) Q. If so, what is the nature of your disability?

30 A. Blindness.

31 (b.) Q. If you have been examined or treated by any



1 physician concerning this disability, please state the full names,  
2 addresses and telephone numbers of each and every such physician.

3 A. Hermann Weiss, M.D. 465 North Roxbury Drive.  
4 Beverly Hills, California, Telephone BR 2-7666; Albert Shapley,  
5 M.D., 1148 4th Street, Santa Monica, Telephone EX 3-0184; Edward  
6 Bierman, M.D., 1212 West 7th Street, Santa Monica, Telephone EX 5-0343

7 32. Q. Prior to January 1, 1965, had you ever been  
8 married?

9 A. Yes.

10 (a.) Q. If so, what was the maiden name of each wife, the  
11 date of each marriage, and the place of each marriage.

12 A. I am unable, at this time, to locate all of  
13 my records regarding this interrogatory. However, I am able, at  
14 this time, to provide the following information:

15 (1.) Joann Dill, married to her from 1952 to  
16 1955, divorced in Cleveland, Ohio, other  
17 information unverified at this time.

18 (2.) Helen Hagen, married to her from 1961 to  
19 1965 married and divorced her in Las Vegas,  
20 Nevada, other information unverified at this  
21 time.

22 34. Q. For each divorce or annulment proceeding to which  
23 you have been a party, please specify the following:

24 A. At this time, I am unable to provide more  
25 specific information than I have previously provided above and  
26 the fact that I married Susan Libowitz on August 19, 1965.

27 35. Q. Have you ever been the father of a child?

28 A. Not to my knowledge.

29

30 41. Q. Do you have any information that the plaintiff

1 had or may have had sexual relations with any of the following men  
2 during the time from June 1, 1965 to September 30, 1965: LARRY  
3 MANNERING, WIN OWENS, GENE OWENS, RAY BLAKE, JERRY LAMONT, LOU  
4 PERRY?

5 A. This question was previously answered "Yes"  
6 with the statement that it was based on rumors from unknown sources  
7 and that I did not know their present addresses. In addition,  
8 it should be stated that Larry Mannering lived with plaintiff  
9 during this time, the exact time is unknown, and that she also  
10 lived with Lou Perry, the exact time being unknown.

11 45. Q. Did the plaintiff ever threaten to kill you?  
12 If so, specify in detail the times, the places and the circumstances  
13 of each such threat.

14 A. Yes. She threatened to kill me many times  
15 between 1965 and 1969. This was primarily done over the telephone  
16 as she calls constantly with obscene comments and threats, some-  
17 times as much as ten times per month.

18 46. Q. Did the plaintiff ever threaten to kill SUE  
19 HOFFMAN or SUSAN ALAMO? If so, specify the times, places and  
20 circumstances of each such threat.

21 A. Yes. She threatened to kill Susan Alamo many  
22 times, in front of many people, between 1965 and 1969. I am  
23 unable, at this time, to be more specific as to times, places and  
24 circumstances of each such threat. In addition, she has told me  
25 that she would kill Susan Alamo over the telephone on numerous  
26 occasions.

27 47. A. Defendant has no further answers on this  
28 question than previously indicated.

29 48. Q. Do you have any knowledge that at any time  
30 between June 1, 1965 and September 30, 1965, the plaintiff lived

1 with any man other than yourself? If so, specify the name or names  
2 of each such man, the dates during which the plaintiff lived with  
3 him, and the place or places where they resided.

4 A. Plaintiff told me that she was in an  
5 accident with seven men and that they tried to stick her as the  
6 driver. She also stated that she had visited some of the men in  
7 their apartments. I am still in the process of locating them.

8 Lan Seldon stated that he took her places during  
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1       this time and defendant believes that the child looks more like  
2       Lan Seldon than it looks like defendant.  
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*Bernie Lazar Hoffman*  
BERNIE LAZAR HOFFMAN

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