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15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **COUNTY OF SAN FRANCISCO — CIVIC CENTER COURTHOUSE**

17 SARRITA ANASTASIA ADAMS,
18
19 Petitioner,
20
21 vs.
22 AMY GULLEY,
23
24 Respondent.

Case No. CCH-24-587004

*Assigned for all purposes to the
Hon. Michelle Tong*

**OPPOSITION TO REQUEST FOR
THIRD CONTINUANCE;
SUPPLEMENTAL DECLARATION OF
ADAM STEINBAUGH; EXHIBITS 1-7**

Date: August 20, 2024
Time: 8:30 a.m.
Dept.: 505

Action Filed: June 6, 2024
Trial date: August 20, 2024

25 Respondent Amy Gulley respectfully submits this memorandum in opposition to the
26 request by Petitioner Sarrita Anastasia Adams to continue the hearing on Gulley's
27 (1) Motion to Quash Petition for Civil Harassment Restraining Order for Lack of Personal
28 Jurisdiction ("Motion to Quash") and (2) Special Motion to Strike ("anti-SLAPP Motion").

ELECTRONICALLY
FILED
Superior Court of California,
County of San Francisco

08/16/2024
Clerk of the Court
BY: KEVIN DOUGHERTY
Deputy Clerk

1 **MEMORANDUM**

2 Despite ample forewarning that Respondent Gulley would file a Motion to Quash
3 and an anti-SLAPP Motion, Petitioner Sarrita Adams failed to respond to either motion.
4 She now seeks to continue this matter a *third* time. The Court should decline Adams’s
5 request because it is not supported by good cause. And extending the TRO for *any* period
6 of time will be deeply prejudicial to Gulley, irreparably harming her First Amendment
7 rights by continuing to impose an unconstitutional prior restraint.

8 **BACKGROUND**

9 Petitioner Sarrita Adams attracted a worldwide media “frenzy” by critiquing and
10 seeking to intervene in the famous trial of a serial murderer, British nurse Lucy Letby.
11 Proclaiming herself an expert by virtue of her claimed University of Cambridge PhD,
12 Adams bristled at the many people who questioned whether her background merited the
13 public attention she sought. She claims to have issued subpoenas, sent bogus copyright
14 takedown notices, and threatened criminal repercussions against her critics.

15 Adams filed this petition on June 6, 2024, targeting one critic—a Pennsylvania
16 resident who has never set foot in California. Adams claimed Respondent Amy Gulley’s
17 criticism harmed her reputation and frustrated her business, “Science on Trial, Inc.” Gulley
18 had raised concerns about whether Adams had completed her claimed PhD, pointing to an
19 opinion of the Court of Appeal suggesting she had not. This Court granted an *ex parte* TRO
20 prohibiting Gulley from making online posts “about” Adams or Science on Trial, Inc.

21 On June 28, Gulley’s counsel asked Adams to dismiss her petition, warning that
22 Gulley would file the anti-SLAPP Motion. (Supplemental Declaration of Adam Steinbaugh
23 [“Steinbaugh Supp. Decl.”], ¶ 3, Ex. 1.) Adams refused and asserted—even before receiving
24 the anti-SLAPP motion—that she had “already prepared a response to your anti-slapp, and
25 we have numerous declarations” in support. (*Id.* ¶ 6, Ex. 3.)

26 On July 11, Gulley’s counsel provided Adams with a copy of the Motion to Quash,
27 which was then formally noticed, filed, and served on July 24, 2024. (*Id.* ¶ 5.) The anti-
28

1 SLAPP Motion was timely noticed, filed, and served the following day. (*Id.* ¶ 8.) Gulley’s
2 counsel provided Adams with courtesy copies of the motions via email. (*Id.* ¶ 9.)

3 Adams’s oppositions were due on August 7, 2024. Adams retained counsel, who first
4 contacted Gulley’s counsel the evening before Adams’s deadline to respond to the motions.
5 (*Id.* ¶ 11.) Adams did not file an opposition to either motion. (*Id.* ¶ 10.)

6 After missing the deadline to respond, Adams now seeks to continue the hearing a
7 third time. At Adams’ request, the June 7 hearing was continued to July 23. (*Id.* ¶ 4, Ex. 2.)
8 That hearing was continued to August 20 to accommodate the hearing on the Motion to
9 Quash and anti-SLAPP Motion. If Adams’ request to continue this matter to September 16
10 were granted, this matter will have been pending for 102 days.

11 ARGUMENT

12 I. The Court Should Exercise Its Broad Discretion to Refuse to Permit A 13 Dilatory Opposition and to Deny a Continuance.

14 A. The Court has “broad discretion” to decline a third continuance, 15 and to decline to consider a dilatory opposition.

16 This Court should decline Adams’s invitation to extend these proceedings a third
17 time. Courts have “broad discretion in deciding whether to grant a request for a
18 continuance,” and there is “no mandatory right to a continuance” under the civil
19 harassment statute. (*Freeman v. Sullivant* (2011) 192 Cal.App.4th 523, 527.) That same
20 “broad discretion” also permits this Court “to accept or reject late-filed papers,” even when
21 a party has appeared in propria persona. (*Rancho Mirage Country Club Homeowners
22 Assn. v. Hazelbaker* (2016) 2 Cal.App.5th 252, 262 [emphasis added].) Here, Adams has
23 not even offered a proposed dilatory opposition to either the straightforward Motion to
24 Quash or the Anti-SLAPP Motion.

25 B. The anti-SLAPP statute and public policy militates in favor of 26 expeditious resolution of SLAPPs like Adams’s petition.

27 Adams’s request for a third continuance should also be denied because it
28 undermines the anti-SLAPP statute’s purpose of expeditious resolution of suits burdening
expressive freedom. The “overall purpose of the SLAPP statute is to provide [respondents]

1 with a procedural remedy which would allow *prompt* exposure and dismissal of SLAPP
2 suits.” (*Morin v. Rosenthal* (2004) 122 Cal.App.4th 673, 681 [cleaned up].)

3 SLAPP plaintiffs have an incentive to draw out a proceeding. Delay forces the
4 respondent to continue to “devote [her] time, energy and financial resources to combatting
5 the lawsuit” while removing her voice from public discourse. (*Wilcox v. Superior Court*
6 (1994) 27 Cal.App.4th 809, 816 [disapproved on other grounds by *Equilon Enterprises v.*
7 *Consumer Cause, Inc.* (2002) 29 Cal.4th 53, 68 n.5].) That incentive is compounded
8 where, as here, the petitioner can extend a TRO imposing a prior restraint on critics’
9 speech.

10 The public interest in avoiding extended litigation over expressive rights is why the
11 statute requires an anti-SLAPP motion be set for “hearing not more than 30 days after the
12 service of the motion.” (Code Civ. Proc., § 426.16, subd. (f).) That period expires on
13 Saturday, August 24, 2024.

14 **C. Adams’s failure to respond and her lack of diligence are not good**
15 **cause to continue to burden Gulley’s First Amendment rights.**

16 Adams, despite ample notice of the forthcoming motions, filed no response to
17 either. (Steinbaugh Supp. Decl., ¶¶ 3, 5–6, 10.) Adams’s deadline to file oppositions was
18 August 7, 2024. (See, Code Civ. Proc., § 1005, subd. (b) [“All papers opposing a motion”
19 must be filed and served at least nine court days before the hearing].)

20 Adams’s failure to oppose the Motions is an implied concession of their merit. (See
21 *Herzberg v. County of Plumas* (2005) 133 Cal.App.4th 1, 20 [failure to oppose portion of
22 demurrer was an abandonment of the issue]; *DuPont Merck Pharmaceutical Co. v.*
23 *Superior Court* (2000) 78 Cal.App.4th 562, 566 [failure to challenge argument in a brief
24 concedes the argument].)

25 Her refusal to respond is not for lack of time: Gulley provided Adams with a copy of
26 the Motion to Quash on July 11, nearly two weeks before it was formally filed and served.
27 (Steinbaugh Supp. Decl., ¶ 5.) And Adams had even *earlier* warning of the anti-SLAPP
28

1 motion, as Gulley’s counsel alerted her it was forthcoming on June 28—a full 40 days
2 before an opposition would be due. (*Id.* ¶ 3, Ex. 1.)

3 Yet Adams waited until the eleventh hour to retain counsel, a delay for which she
4 offers no explanation. That lack of diligence does not provide good cause to burden Gulley
5 with further delay in resolving this matter.

6 **II. Extending the TRO Will Prejudice Gulley by Imposing an**
7 **Unconstitutional Prior Restraint and Forcing Gulley to Litigate in a**
8 **Distant Court.**

9 If the Court were to grant a third continuance, extending the TRO would prejudice
10 Gulley by prolonging an unconstitutional prior restraint on speech protected by the First
11 Amendment. Further, by prolonging adjudication of the motions, Gulley will be forced to
12 continue litigating this matter in this Court—three time zones away—that has no
13 jurisdiction over her.¹

14 A civil harassment restraining order prohibiting the respondent from “making or
15 publishing” statements about another person—like the TRO prohibiting Gulley from
16 making posts “about” Adams—is a “classic type of an unconstitutional prior restraint.”
17 (*Evans v. Evans* (2008) 162 Cal.App.4th 1157, 1167–1169 [reversing order prohibiting
18 “false and defamatory” statements on the internet].)

19 The prejudicial effect of a prior restraint cannot be understated. A prior restraint is
20 the “most serious and the least tolerable” limit on First Amendment rights. (*Neb. Press*
21 *Assn. v. Stuart* (1976) 427 U.S. 539, 559). The risks that prior restraints present to freedom
22 of expression are so great that the “chief purpose” in adopting the First Amendment was to
23 prevent their use. (*Near v. Minn.* (1931) 283 U.S. 697, 713.) A prior restraint carries a
24 “heavy presumption against its constitutional validity” and is rarely justified outside of the
25 context of national security concerns—and even in that weighty context prior restraints are
26 treated with deep suspicion. (*New York Times Co. v. United States* (1971) 403 U.S. 713, 714

27 _____
28 ¹ A continuance prejudices Gulley by shifting the burden of Adams’s lack of diligence to Gulley. While the costs
imposed by requiring Gulley’s counsel to change travel plans pale in comparison to the prejudice to Gulley’s First
Amendment rights, they are nonetheless costs that Gulley’s *pro bono* counsel are unlikely to recover.

1 [per curiam] [rejecting prior restraints in the context of the Pentagon Papers and quoting,
2 in part, *Bantam Books, Inc. v. Sullivan* (1963) 372 U.S. 58, 70].)

3 Those risks are immediate. Gulley faces the possibility of arrest if she utters a word
4 about Adams or her company. Adams has used the TRO to threaten Gulley’s arrest even for
5 speech by *third parties*. (Steinbaugh Supp. Decl., ¶¶ 12–14, Exs. 5–7.) And Adams has
6 expanded the chilling effect beyond Gulley, using the TRO to threaten other online critics
7 by falsely representing that the TRO binds them. (*Id.* ¶ 12, Ex. 5.)

8 That is why the Court of Appeal has repeatedly overturned prior restraints like the
9 one currently applied to Gulley. (See, e.g., *Evans, supra*, 162 Cal.App.4th at 1167–1169;
10 *Smith v. Silvey* (1983) 149 Cal.App.3d 400, 406–407 [order prohibiting respondent from
11 “contacting” residents of mobile home park was “unconstitutionally overbroad” because it
12 limited distribution of “literature”]; *Thomas v. Quintero* (2005) 126 Cal.App.4th 635, 643,
13 663 [prohibition on “distributing false and misleading handbills” about petitioner].)

14 The prejudice to fragile speech rights is why the anti-SLAPP statute provides an
15 expeditious path to ending the litigation. A continuance undermines that purpose of the
16 anti-SLAPP statute. No continuance, however brief, can justify the continued imposition of
17 a prior restraint: As the Supreme Court has made clear, the “loss of First Amendment
18 freedoms, for even *minimal* periods of time, unquestionably constitutes irreparable
19 injury.” (*Elrod v. Burns* (1976) 427 U.S. 347, 373 [emphasis added].)

20 **CONCLUSION**

21 Respondent respectfully requests this Court deny a third continuance and dissolve
22 the TRO.

23
24 DATED: August 16, 2024

FOUNDATION FOR INDIVIDUAL
RIGHTS & EXPRESSION

25
26 By: 
Adam Steinbaugh
27 Attorney for Respondent Amy Gulley
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INDEX OF EXHIBITS

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1 **SUPPLEMENTAL DECLARATION OF ADAM STEINBAUGH**

2 I, Adam Steinbaugh, hereby declare:

3 1. I am an attorney licensed to practice in California. I work for a non-profit
4 organization, the Foundation for Individual Rights and Expression (FIRE), which provides
5 *pro bono* legal assistance on First Amendment matters. I am an attorney of record for
6 Respondent Amy Gulley in this matter. As such, I have personal knowledge of the matters
7 stated herein and could competently testify thereto.

8 2. I make this supplemental declaration in opposition to Petitioner Sarrita
9 Adams’s request for a third continuance of this matter, and in further support of
10 Respondent Gulley’s Motion to Quash Petition for Civil Harassment Restraining Order for
11 Lack of Personal Jurisdiction (“Motion to Quash”) and Special Motion to Strike (“anti-
12 SLAPP Motion”).

13 3. A true and correct copy of an email I sent to Petitioner Adams on June 28,
14 2024, is attached as **Exhibit 1**. In the email, I informed Adams that I was preparing to file
15 a motion to quash and an anti-SLAPP motion.

16 4. A true and correct copy of the Court’s July 2, 2024, Order on Adams’s request
17 to continue the hearing is attached as **Exhibit 2**.

18 5. On July 11, 2024, I attempted to file Gulley’s Motion to Quash. I served
19 Adams with a copy of the same on the same date, sending it to her via Express Mail to the
20 address listed on her petition. While the court clerk later rejected that filing, the papers I
21 served on Adams on July 11—including the memorandum, declarations, and exhibits—are
22 substantively identical to the version I subsequently served and filed on Petitioner Adams
23 on July 24, 2024.

24 6. A true and correct copy of an email I received from Petitioner Adams on July
25 11, 2024, is attached as **Exhibit 3**. In the email, Adams states: “We have already prepared
26 a response to your anti-slapp, and we have numerous declarations from witnesses stating
27 they observed Gulley’s criminal conduct, in the form of stalking and harassment.”
28

1 7. On July 24, 2024, I served the Motion to Quash and associated documents
2 via overnight delivery to Petitioner Adams’s mailing address by Federal Express.

3 8. On July 25, 2024, I served the anti-SLAPP motion and associated documents
4 via overnight delivery to Petitioner Adams’s mailing address by the United States Postal
5 Service.

6 9. A true and correct copy of an email I sent to Petitioner Adams on July 25,
7 2024, providing her with courtesy copies of the Motion to Quash and anti-SLAPP Motion,
8 is attached as **Exhibit 4**.

9 10. I have not received an opposition to either the Motion to Quash or anti-
10 SLAPP Motion.

11 11. On the evening of August 6, 2024, I first heard from Petitioner Adams’s
12 counsel.

13 12. A true and correct copy of a June 7, 2024, tweet from Adams, available at
14 https://x.com/Forensic_Sci_/status/1798984967290229131 and archived at
15 <https://archive.is/LtojB>, is attached as **Exhibit 5**. The tweet responds to a Twitter user
16 who is not Amy Gulley and states, in pertinent part:

17 your name is on the list of people/accounts included in the
18 RO. In the CA you do not need the person’s actual name to
19 restrain them from harassing a person.

19 13. A true and correct copy of a tweet from Adams on June 11, 2024, available at
20 https://x.com/Forensic_Sci_/status/1800520988674986234 and archived at
21 <https://archive.is/q7OkT>, is attached as **Exhibit 6**. The tweet states, in pertinent part:

22 There is an order prohibiting people associated with Amy
23 Gulley aka @mrjgossipgirl from stalking. As a result, every
24 time you harass and stalk [Science on Trial, Inc.] or
25 individuals associated with it, where you have a relationship
26 with Amy Gulley @mrjgossipgirl , it is clear you are assisting
27 her in her stalking effort, and she will be held responsible for
28 your ongoing stalking and harassment.

1 14. A true and correct copy of a tweet from Adams on June 13, 2024, available at
2 https://x.com/Forensic_Sci_/status/1801317806941843758 and archived at
3 <https://archive.is/KcrBJ>, is attached as **Exhibit 7**. The tweet states:

4 @support This person is associated with Amy Gulley who is
5 restrained from any further contact, from the named
6 individual and the company Science on Trial, inc. Ongoing
7 stalking via a third party is still stalking. Please see the Link
8 Below. We will be contacting Montgomery County Sheriff
9 Dept, to inform them that the Restraining Order has been
10 violated. The PDF at this link contains the restraining Order
11 that is currently in force as issued by San Francisco County
12 Superior Court. [https://lumendatabase.org/notices/
13 42210575?access_token=T6DOcZjxiP_sxWFLd9iObA](https://lumendatabase.org/notices/42210575?access_token=T6DOcZjxiP_sxWFLd9iObA)

14 I declare under penalty of perjury under the laws of the State of California that the
15 foregoing is true and correct.

16 Executed this 16th day of August, 2024, in Denver, Colorado.


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Adam Steinbaugh

EXHIBIT 1



Adam Steinbaugh <adam@thefire.org>

Adams vs. Gulley - Proposed Stipulation and EX PARTE NOTICE

Adam Steinbaugh <adam@thefire.org>

Fri, Jun 28, 2024 at 3:42 PM

To: [REDACTED]

Cc: JT Morris <JT.Morris@thefire.org>, Gabe Walters <gabe.walters@thefire.org>, Matthew Strugar <matthew@matthewstrugar.com>, Colin McDonell <colin.mcdonell@thefire.org>

Dear Sarrita Adams:

I represent Amy Gulley in connection with your petition for a civil harassment restraining order against Gulley and 20 John Doe defendants. The hearing on your petition is set for July 2, 2024.

First, I strongly urge you to voluntarily dismiss your petition. I am preparing to file a motion to quash and an anti-SLAPP motion. If the anti-SLAPP motion is granted, Gulley will be awarded attorneys' fees. (Code Civ. Pro., § 425.16 subd. (c) (1).) You can avoid that outcome by dismissing the petition at any time before we file the anti-SLAPP motion.

While you consider that, I'm writing to ask if you would agree to a continuance of the July 2 hearing. Under Code of Civil Procedure section 527.6, subdivision (o), Gulley is entitled to a continuance as a matter of right. Additionally, *Thomas v. Quintero* (2005) 126 Cal.App.4th 635, 649 allows continuances so that an anti-SLAPP motion is heard before the hearing on the civil harassment restraining order petition. I have attached a copy of that decision for your convenience.

Would you agree to (1) continue the hearing on your petition to August 20, 2024 (or a date three weeks after a hearing on the anti-SLAPP motion and motion to quash); and (2) hold a hearing on the anti-SLAPP motion and motion to quash on July 30, 2024, or as soon thereafter as the court may schedule it?

If you are agreeable to that, I have attached a stipulation to that effect and ask that you sign and email it to me.

Please let me know your position as soon as is practicable. If I do not hear from you **before 4:00 p.m. Pacific Time on June 28, 2024**, I will seek a continuance on an *ex parte* application.

Absent your agreement to that schedule, **please take notice** that on Tuesday, July 2, 2024, at 8:30 a.m. or as soon as the matter may be heard in Department 505 of the San Francisco Superior Court, at 400 McAllister St., San Francisco, CA, 94102, Respondent Amy Gulley will apply *ex parte* for an order setting the date for hearing on Respondent's anticipated anti-SLAPP motion and motion to quash for July 30, 2024, and continuing the July 2, 2024 hearing on the petition for a civil harassment restraining order to August 20, 2024, or a date three weeks after a hearing on the petition.

Also, please let me know whether you are amenable to service of documents we file via email. I am amenable.

Thank you in advance,

Adam B. Steinbaugh

Attorney*

Foundation for Individual Rights and Expression

510 Walnut Street

Suite 900

Philadelphia, PA 19106


(215) 717-3473

adam@thefire.org

This communication may contain information that is confidential or privileged. Unless you are the addressee (or authorized to receive this message by the addressee), you may not use, copy, or disclose the contents of this message or information contained in this message to anyone. If you believe that you have received this message in error, please advise the sender and delete this message.

* Admitted in California and Pennsylvania

2 attachments

 **Thomas v. Quintero_ 126 Cal. App. 4th 635.PDF**
522K

 **[DRAFT] Stipulation and Proposed Order Continuing July 2, 2024 Hearing.pdf**
110K

EXHIBIT 2

CH-116

Order on Request to Continue Hearing

Clerk stamps date here when form is filed.

ENDORSED
FILED
San Francisco County Superior Court

JUL 02 2024

CLERK OF THE COURT
BY: ANGELICA SUNGA
Deputy Clerk

Complete items ① and ② only.

① **Protected Party:** Sarrita Anastasia Adams

② **Restrained Party:** Amy Gulley

_____ **The court will complete the rest of this form** _____

③ Next Court Date

a. The request to reschedule the court date is **denied**.

Your court date is: _____

(1) Any *Temporary Restraining Order* (form CH-110) already granted stays in full force and effect until the next court date.

(2) Your court date is not rescheduled because: _____

Fill in court name and street address:

Superior Court of California, County of San Francisco

400 McAllister St.
San Francisco, CA 94102

Fill in case number:

Case Number:
CCH-24-587004

b. The request to reschedule the court date is **granted**. Your court date is rescheduled for the day and time listed below. See ④–⑧ for more information.

Name and address of court, if different from above:

New Court Date → Date: Jul 23, 2024 Time: 8:30 am
Dept.: 505 Room: 505

④ Temporary Restraining Order

a. **There is no Temporary Restraining Order (TRO) in this case until the next court date** because:.

(1) A TRO was not previously granted by the court.

(2) The court terminates (cancels) the previously granted TRO because: _____

b. **A Temporary Restraining Order (TRO) is still in full force and effect** because:

(1) The court extends the TRO previously granted on (date): June 7, 2024

It now expires on (date): July 23, 2024

(If no date is listed, the TRO expires at the end of the court date listed in 3b.)

(2) The court changes the TRO previously granted and signs a new TRO (form CH-110).

c. Other (specify): _____

Warning and Notice to the Restrained Party:
If ④ b is checked, a civil harassment restraining order has been issued against you. You must follow the orders until they expire.

This is a Court Order.



5 Reason Court Date Is Rescheduled

a. There is good cause to reschedule the court date (*check one*):

(1) The protected party has not served the restrained party.

(2) Other: _____

b. This is the first time that the restrained party has asked for more time to prepare.

c. The court reschedules the court date on its own motion.

6 Serving (Giving) Order to Other Party

The request to reschedule was made by the:

a. Protected party

b. Restrained party

c. Court

(1) You do not have to serve the restrained party because they or their lawyer were at the court date or agreed to reschedule the court date.

(2) You must have the restrained party personally served with a copy of this order and a copy of all documents listed on form CH-109, item **6**, by (date): July 18, 2024

(3) You must have the restrained party served with a copy of this order. This can be done by mail. You must serve by (date): _____

(4) The court gives you permission to serve the restrained party as listed on the attached form CH-117.

(5) Other: _____

(1) You do not have to serve the protected party because they or their lawyer were at the court date or agreed to reschedule the court date.

(2) You must have the protected party personally served with a copy of this order by (date): _____

(3) You must have the protected party served with a copy of this order. This can be done by mail. You must serve by (date): _____

(4) Other: _____

(1) Further notice is not required.

(2) The court will mail a copy of this order to all parties by (date): _____

(3) Other: _____

This is a Court Order.



7 No Fee to Serve (Notify) Restrained Person Ordered Not Ordered

The sheriff or marshal will serve this order for free because:

- a. The order is based on unlawful violence, a credible threat of violence, or stalking.
- b. The person in 1 is entitled to a fee waiver.

8 Other Orders

CHRISTOPHER C. HITE

Date: July 2, 2024

Judicial Officer



Request for Accommodations

Assistive listening systems, computer-assisted real-time captioning, or sign language interpreter services are available if you ask at least five days before the hearing. Contact the clerk's office or go to www.courts.ca.gov/forms.htm for Disability Accommodation Request (form MC-410). (Civ. Code, § 54.8.)

Instructions to Clerk

If the hearing is rescheduled and the court extended, modified, or terminated a temporary restraining order, then the court must enter this order into CLETS or send this order to law enforcement to enter into CLETS. This must be done within one business day from the day the order is made.

—Clerk's Certificate—



Clerk's Certificate

I certify that this Order on Request to Continue Hearing (Temporary Restraining Order) (CLETS-TCH) is a true and correct copy of the original on file in the court.

Date: JUL 02 2024 Clerk, by Clerk of the Court, Deputy

This is a Court Order.

EXHIBIT 3



Adam Steinbaugh <adam@thefire.org>

Ongoing violation of Restraining Order and Copyright Infringement - Amy Gulley

Sarrita Adams [REDACTED]
To: Adam Steinbaugh <adam@thefire.org>

Thu, Jul 11, 2024 at 1:03 AM

Thank you for this email. You have confirmed that Ms. Gulley is still stalking me. Owing to my status as a dependent adult, which Gulley has learned through reading my divorce fillings, I will be seeking to amend the complaint to obtain a dependent adult restraining order. I am very frightened of your client, and she has caused significant suffering and harm to me.

Please note, this statement will form the basis of the contempt action.

2) the references to the name "Science on Trial" are to criticize -- not impersonate -- that entity;

Gulley's subreddit features my name and she is not allowed to stalk me but her subreddit performs this exact role. Her "criticism" amounts to statements such as I have been following Sarrita for a year..." Lying about the events in my divorce, and encouraging others to interfere with a private business. Gulley is not a customer of Science on Trial, she is simply my internet stalker, and she is not permitted to use the products of her stalking to continue to encourage others to stalk me, as this is still a breach of the court order.

The S.F. Police are being notified of the violation, and the fact that you have encouraged Gulley's criminal activity.

Since you are confused about the criminal conduct you are advocating see the statute.
[California Penal Code \[CPC\] §646.9\(a\)](#) –

(a) Any person who willfully, maliciously, and repeatedly follows or willfully and maliciously harasses another person and who makes a credible threat with the intent to place that person in reasonable fear for his or her safety, or the safety of his or her immediate family is guilty of the crime of stalking,

(b) Any person who violates subdivision (a) when there is a temporary restraining order, injunction, or any other court order in effect prohibiting the behavior described in subdivision (a) against the same party, shall be punished by imprisonment in the state prison for two, three, or four years.

Please note the 200 pages of exhibits we have of your client's unhinged harassment, have been shown by major British media outlets to be nothing but defamation. Gulley's claims I am a fake scientist, a liar and so forth make up her stalking and harassing behavior. Major publications, along with scores of doctors, lawyers, scientists and experts have come out and supported the work conducted by Science on Trial. Her claims that my work is not accurate are now shown to be unfounded, and frankly of no concern of hers since this is case in Britain, where I am citizen.

<https://www.theguardian.com/uk-news/article/2024/jul/09/lucy-letby-evidence-experts-question>

<https://www.telegraph.co.uk/news/2024/07/09/lucy-letby-serial-killer-or-miscarriage-justice-victim/>

I would recommend you abandon your harassing litigation, you are supporting a woman who stalks and harasses people simply because they are engaged in matters relating to their country of citizenship. You will not meet either the 1st nor 2nd prong of an anti-SLAPP motion. Not least when you email me to inform me your client is going to continue stalking me as per your legal advice. Perhaps Ms Gulley should retain a RO attorney, as you appear unable to recognize that criminal stalking is not equivalent to free speech.

It is now clear Gulley's harassment was designed to silence my free speech such that she could limit the extent to which my work could impact issues in my home country. I have a write to engage in matters pertaining to my home country without violent and abusive American Citizens claiming they have a right to place me at fear of

serious harm.

We have already prepared a response to your anti-slapp, and we have numerous declarations from witnesses stating they observed Gulley's criminal conduct, in the form of stalking and harassment. We also have her numerous screenshots detailing her criminal actions to stalk and harass me.

Your continued involvement in this matter is simply a clear effort to extract money from me through vexatious litigation, where you state in writing that you are encouraging your client to maintain a subreddit group which only she controls and where she continues to highlight her stalking actions.

I am not agreeable to a continuance to the 20th. You have not served me with any filings, and you have sent me evidence that you are supporting your client's harassment. As stated the police will be notified of your client's ongoing criminal conduct and the DA can assess your claims that stalking is free speech.

Best,

Sarrita

On Wed, 10 Jul 2024 at 18:45, Adam Steinbaugh <adam@thefire.org> wrote:

Sarrita Adams:

Again, please let me know whether you will agree to a continuance of the hearing to August 20 so that you will have adequate time to respond to Respondent Gulley's forthcoming motion to quash and anti-SLAPP motion. Additionally, I would appreciate your cooperation on scheduling, as I have a family vacation and will not be able to prepare for or attend a hearing on July 23.

With respect to the Court's order: (1) the social media posts are not publicly available; (2) the references to the name "Science on Trial" are to criticize -- not impersonate -- that entity; and (3) Google has no more access to the social media posts than the general public (that is, none) and Gulley cannot control what Google publishes.

To the extent that you assert claims for defamation or copyright, those are not relevant to this proceeding. You should avoid issuing copyright takedown notices for fair uses of content.

Finally, for clarity, the balance of your allegations are denied.

Thanks in advance,

Adam B. Steinbaugh

Attorney*

Foundation for Individual Rights and Expression

510 Walnut Street

Suite 900

Philadelphia, PA 19106

(215) 717-3473

adam@thefire.org

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** Admitted in California and Pennsylvania*

On Tue, Jul 9, 2024 at 8:22 PM Sarrita Adams [REDACTED] wrote:

Sirs,

Your client continues to violate the restraining order by maintaining her harassing posts and also impersonating our business name - Science on Trial, Inc in her subreddit page. Additionally, your client has extensively infringed on

Science on Trial, Inc copyright by publishing our copyrighted work. She maintains her posts on a private - invitation only site, where the content is still clearly searchable on Google.

The court order is clear that Ms. Gulley must remove her harassing posts and stop impersonating the business Science on Trial, Inc. Ms Gulley continues to impersonate Science on Trial, Inc, and her harassing posts are still searchable. Please instruct your client to adhere to the court order as written. In the event she fails to comply with the court order I will be required to report this offense to the police.

Further, we have documentation from your client stating that she has been watching, following and 'collecting receipts' on my online movements since May 2023, this predates any coverage of me in the UK media. Your client was involved in a stalking and smear campaign prior to the minor media coverage in which the work of Science on Trial, Inc, was featured.

Recent media coverage on the Letby Case further undermines your claims that I played a pivotal role as an expert of any kind, nor has there been any widespread interest in me. Your client has a massive platform on her LucyLetby subreddit, she has used that to silence numerous individuals, block and banning them from comment while silencing any person who has disagreed with her narrow and misinformed scientific opinions. Further, Ms. Gulley has repeatedly defamed me by stating I am a domestic abuser. A transcript from 2020 from my divorce proceedings makes clear that the court did not find me to be a domestic abuser. This is why it is unwise to rely on an unpublished opinion, based on actions that occurred in 2016/2017, and where the case is still ongoing. Further, separate findings make clear I was deemed to be the victim of abuse.

Please inform your client that we will proceed to report her ongoing violations to the police if she is unable to adhere to the court order. She is required to stop impersonating Science on Trial, Inc, this means she must stop advertising her harassing and defamatory subreddit using the business name.

I have included screenshots of her violations and proof of impersonation of Science on Trial, Inc. Please also instruct your client to remove all material that is the property of Science on Trial, Inc, which she copied, or stole, from our websites. We can provide Copyright Certification at your request.

Best,

Sarrita Adams



Follow

mrjusticegossipgirl

@mrjgossipgirl

The Justice Girl r/scienceontrial

[reddit.com/r/scienceontri...](https://reddit.com/r/scienceontrial) Joined October 2023

47 Following 40 Followers

These posts are protected.

Only confirmed followers have access to @mrjgossipgirl's posts and complete profile. Tap the Follow button to send a follow request.



12:03



scienceontrial

This community exists to fact check claims about Science on Trial, its creator Sarrita Adams, and various statements that can be credited to her.

This is a private community. Only approved members can view and contribute.

Reason for approval*

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Science on Trial | Sarrita Adams

Science on Trial, Inc. specializes in evaluating forensic science in criminal and medicolegal malpractice cases, ...



- The Lucy Letby Case Blog Our Business Law Firms



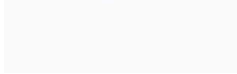
Reddit · r/scienceontrial
140+ followers

r/ScienceonTrial

r/scienceontrial: This community exists to fact check claims about Science on Trial, its creator Sarrita Adams, and various ...



Science On Trial - Who Is The Ring Leader? : r/lucyletb... >



Q scienceontrial

On Fri, 28 Jun 2024 at 23:30, Adam Steinbaugh <adam@thefire.org> wrote:

Dear Sarrita Adams --

As a courtesy, please find attached copies of the application we filed this evening. Again, I strongly suggest that you dismiss the petition before we file an anti-SLAPP motion. If you intend to voluntarily dismiss the petition, please let me know.

Sincerely,

Adam B. Steinbaugh

Attorney*

Foundation for Individual Rights and Expression

510 Walnut Street

Suite 900

Philadelphia, PA 19106

(215) 717-3473

adam@thefire.org

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On Fri, Jun 28, 2024 at 3:42 PM Adam Steinbaugh <adam@thefire.org> wrote:

Dear Sarrita Adams:

I represent Amy Gulley in connection with your petition for a civil harassment restraining order against Gulley and 20 John Doe defendants. The hearing on your petition is set for July 2, 2024.

First, I strongly urge you to voluntarily dismiss your petition. I am preparing to file a motion to quash and an anti-SLAPP motion. If the anti-SLAPP motion is granted, Gulley will be awarded attorneys' fees. (Code Civ. Pro., § 425.16 subd. (c)(1).) You can avoid that outcome by dismissing the petition at any time before we file the anti-SLAPP motion.

While you consider that, I'm writing to ask if you would agree to a continuance of the July 2 hearing. Under Code of Civil Procedure section 527.6, subdivision (o), Gulley is entitled to a continuance as a matter of right. Additionally, *Thomas v. Quintero* (2005) 126 Cal.App.4th 635, 649 allows continuances so that an anti-SLAPP motion is heard before the hearing on the civil harassment restraining order petition. I have attached a copy of that decision for your convenience.

Would you agree to (1) continue the hearing on your petition to August 20, 2024 (or a date three weeks after a hearing on the anti-SLAPP motion and motion to quash); and (2) hold a hearing on the anti-SLAPP motion and motion to quash on July 30, 2024, or as soon thereafter as the court may schedule it?

If you are agreeable to that, I have attached a stipulation to that effect and ask that you sign and email it to me.

Please let me know your position as soon as is practicable. If I do not hear from you **before 4:00 p.m. Pacific Time on June 28, 2024**, I will seek a continuance on an *ex parte* application.

Absent your agreement to that schedule, **please take notice** that on Tuesday, July 2, 2024, at 8:30 a.m. or as soon as the matter may be heard in Department 505 of the San Francisco Superior Court, at [400 McAllister St., San Francisco, CA, 94102](#), Respondent Amy Gulley will apply *ex parte* for an order setting the date for hearing on Respondent's anticipated anti-SLAPP motion and motion to quash for July 30, 2024, and continuing the July 2, 2024 hearing on the petition for a civil harassment restraining order to August 20, 2024, or a date three weeks after a hearing on the petition.

Also, please let me know whether you are amenable to service of documents we file via email. I am amenable.

Thank you in advance,

Adam B. Steinbaugh

Attorney*

Foundation for Individual Rights and Expression

510 Walnut Street

Suite 900

Philadelphia, PA 19106

(215) 717-3473

adam@thefire.org

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EXHIBIT 4



Adam Steinbaugh <adam@thefire.org>

[Adams v. Gulley] Motion to Quash and anti-SLAPP Motion

Adam Steinbaugh <adam@thefire.org>

Thu, Jul 25, 2024 at 10:24 PM

To: Sarrita Adams [REDACTED]

Cc: JT Morris <JT.Morris@thefire.org>, Gabe Walters <gabe.walters@thefire.org>, Colin McDonell <colin.mcdonell@thefire.org>, Matthew Strugar <matthew@matthewstrugar.com>

Dear Sarrita Adams,

As a courtesy, electronic versions of the following documents, which have been submitted to the Court, are available at this URL: [REDACTED] The password to access these documents is: [REDACTED]

- **Motion to Quash**

- Special Appearance: Respondent Amy Gulley's Notice of Motion and Motion to Quash Petition for Civil Harassment Restraining Order for Lack of Personal Jurisdiction Pursuant to Cal. Code Civ. Proc. § 418.10(a)(1); Memorandum of Points and Authorities; Declaration of Amy Gulley; Declaration of Adam Steinbaugh
- [Proposed] Order on Respondent Amy Gulley's Motion to Quash
- Proof of Service of Respondent Amy Guley's Motion to Quash

- **Anti-SLAPP Motion**

- Respondent Amy Gulley's Notice of Motion and Special Motion to Strike [CCP § 425.16]; Memorandum of Points and Authorities; Index of Exhibits; Declaration of Amy Gulley; Declaration of Adam Steinbaugh; Exhibits 1-48
- Respondent Amy Gulley's Request for Judicial Notice in Support of Special Motion to Strike; Declaration of Adam Steinbaugh in Support of Request for Judicial Notice; Exhibits A-C
- [Proposed] Order on Respondent Amy Gulley's Special Motion to Strike [CCP § 425.16]
- [Proposed] Order on Respondent Amy Gulley's Request for Judicial Notice in Support of Special Motion to Strike
- Proof of Service of Respondent Amy Gulley's Special Motion to Strike [CCP § 425.16]

If you have an alternative method for receiving electronic documents, please let me know. I am providing these documents only as a courtesy (not as electronic service), as you have declined to agree to electronic service. However, I want to make sure that you have a full and fair opportunity to respond, given that you have previously asserted that you have not received documents served via the address you provided to the Court ([REDACTED] San Francisco, CA, [REDACTED]).

The anti-SLAPP motion was served via overnight delivery by the U.S. Postal Service today (July 25, 2024). The Motion to Quash was served via overnight delivery by Federal Express yesterday (July 24, 2024). However, I am informed by a voicemail from Federal Express that the mailing address you provided to the Court is not valid. Again, it is to your benefit that you ensure that you can receive service of documents at the address you provide to the Court, as service at that address will be effective even if you do not receive it.

Best,

Adam B. Steinbaugh

Attorney*

Foundation for Individual Rights and Expression

510 Walnut Street

Suite 900

Philadelphia, PA 19106

(215) 717-3473

adam@thefire.org

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 **Adam Steinbaugh** 
@adamsteinbaugh

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RailroadChildren @RailroadChildr1 · Jun 6

Amy, you are describing yourself. You have extreme mental issues. It is best if you attempted to control yourself. Unfortunately, it's clear you can't do so, but the evidence in support of a RO is extreme. It's also a quasi-criminal conviction. You should stop now. @gill1109

2 replies 1 like 167 views

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Science On Trial 
@Forensic_Sci_

It is okay, your name is on the list of people/accounts included in the RO. In the CA you do not need the person's actual name to restrain them from harassing a person. @gill1109 must be proud of his smear campaign, look at the scum he has encouraged.

3:46 AM · Jun 7, 2024 · 162 Views

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 **Adam Steinbaugh** 
@adamsteinbaugh

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 **TriedByStats**  @triedbystats · Jun 7

I made a small website exploring the statistics behind Lucy Letbys conviction. I started with the assumption that she was guilty, now I'm convinced she is innocent.

triedbystats.com
These are the salient points:

16 66 164 49K

 **m321** @jolt4321 · Jun 10

Another idiot with links to certified nutter Richard Gill and the mentality deranged Saritta Adams with her fake PhD.

Sad, deluded twat

3 2 516

 **Science On Trial**  @Forensic_Sci_

Misspelling the name of the person you are stalking does not change the fact you are stalking them. There is an order prohibiting people associated with Amy Gulley aka @mrjgossipgirl from stalking. As a result, every time you harass and stalk SoT or individuals associated with it, where you have a relationship with Amy Gulley @mrjgossipgirl, it is clear you are assisting her in her stalking effort, and she will be held responsible for your ongoing stalking and harassment.

9:30 AM · Jun 11, 2024 · 208 Views



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Science On Trial
@Forensic_Sci_

@support

This person is associated with Amy Gulley who is restrained from any further contact, from the named individual and the company Science on Trial, inc. Ongoing stalking via a third party is still stalking. Please see the Link Below. We will be contacting Montgomery County Sheriff Dept, to inform them that the Restraining Order has been violated.

The PDF at this link contains the restraining Order that is currently in force as issued by San Francisco County Superior Court.

lumendatabase.org/notices/422105...

2:16 PM · Jun 13, 2024 · 496 Views



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3



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