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14 *Attorneys for Respondent Amy Gulley*

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

17 SARRITA ANASTASIA ADAMS,  
18  
19 Petitioner,

20 vs.

21 AMY GULLEY,  
22  
23 Respondent.

Case No. CCH-24-587004

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

**FURTHER NOTICE OF NON-  
OPPOSITION TO RESPONDENT AMY  
GULLEY’S MOTION TO QUASH AND  
SPECIAL MOTION TO STRIKE [CCP  
§ 425.16]; SUPPLEMENTAL  
DECLARATION OF ADAM  
STEINBAUGH; EXHIBIT 1.**

Date: September 30, 2024  
Time: 9:30 a.m.  
Dept.: 505

Action Filed: June 6, 2024  
Trial date: September 30, 2024

ELECTRONICALLY

**FILED**

*Superior Court of California,  
County of San Francisco*

**09/23/2024**  
**Clerk of the Court**

BY: WILLIAM TRUPEK  
Deputy Clerk



1 The anti-SLAPP motion established that Gulley’s speech addressed matters of public  
2 concern and that her speech is protected by the First Amendment as a matter of law. That  
3 shifted the burden to Adams to “produce evidence to substantiate” her claim. (*Siam v.*  
4 *Kizilbash* (2005) 130 Cal.App.4th 1563, 1570.) Yet even if Adams had done so, Gulley  
5 would prevail because she has shown that her speech is protected by the First Amendment.  
6 (*Id.* [anti-SLAPP motions must be granted where the petitioner “fails to produce evidence  
7 to substantiate [her] claim or if the [respondent] has shown that the [petitioner] cannot  
8 prevail as a matter of law”].)

9 The Court should grant the motions before Gulley is forced to expend additional  
10 resources on Adams’s SLAPP. (See, e.g., *Singh v. Lipworth* (2014) 227 Cal.App.4th 813,  
11 829 [affirming Superior Court’s “unassailable” reasoning in granting anti-SLAPP motion  
12 where the appellant “failed to file any opposition to the anti-SLAPP motion and thus [was]  
13 unable to meet her burden”].)

14 DATED: September 23, 2024

FOUNDATION FOR INDIVIDUAL  
RIGHTS & EXPRESSION

16 By:   
17 Adam Steinbaugh  
18 Attorney for Respondent Amy Gulley

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in them” when there is no evidentiary showing that the respondent intentionally targeted a “California audience.”  
(*ViaView, Inc. v. Retzlaff* (2016) 1 Cal.App.5th 198, 218–219.)

**INDEX OF EXHIBITS**

<b>Exhibit</b>	<b>Description</b>	<b>Page(s)</b>
1	September 18, 2024, email from Marc Pelta to Adam Steinbaugh	5-6

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Adam Steinbaugh <adam@thefire.org>

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## [Adams v. Gulley] Notice of non-opposition to Motion to Quash, anti-SLAPP Motion

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Marc Pelta <marc@peltalaw.com>

Thu, Sep 19, 2024 at 2:21 AM

To: Adam Steinbaugh <adam@thefire.org>, Okorie Okorochoa <OO@ooesq.com>

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

Adam,

We will be responding tonight and tomorrow with our oppositions. As you know, I filed the Request to Continue that you were opposed to, so I requested it be dismissed. The CHRO petition clearly shows that your client, Ms Gulley, initiated contact with my client who lives here. Therefore your motion to quash is without merit. I will deal with the SLAPP in due course.

Thank you,

**Marc Pelta, Attorney-at-Law**  
PELTA|LAW  
**SF Bay Area Location:**  
1390 Market Street, Suite 200  
San Francisco, CA 94102  
Tel. 415-963-1152  
website: [www.peltalaw.com](http://www.peltalaw.com)

**"Representing Clients Across California"**

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**From:** Adam Steinbaugh <adam@thefire.org>

**Sent:** Wednesday, September 18, 2024 8:59 PM

**To:** Marc Pelta <marc@peltalaw.com>; Okorie Okorochoa <OO@ooesq.com>


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

**Subject:** [Adams v. Gulley] Notice of non-opposition to Motion to Quash, anti-SLAPP Motion

Mr. Pelta and Mr. Okorochoa,

Please see the attached, which was filed with the Court this evening. These have also been uploaded to Box.com at [REDACTED]. The password to access these documents is: [REDACTED]

 2024.09.18 - Notice of Non-Opposition to Anti-SLAPP Motion - 01 - Memorandum.pdf

 2024.09.18 - Notice of Non-Opposition to Anti-SLAPP Motion - 02 - Proposed Order.pdf



2024.09.18 - Notice of Non-Opposition to Anti-SLAPP Motion - 03 - Proof of Service.pdf

Best,

**Adam B. Steinbaugh**

Attorney\*

Foundation for Individual Rights and Expression

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*\* Admitted in California and Pennsylvania*