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9	Attorneys for Petitioner Sarrita Anastasia Ad	ams			
10	Theories of the filterior surface that the substantial				
11					
12	SUPERIOR COURT OF THE STATE OF CALIFORNIA				
13	COUNTY OF SAN FRANCISC	O – CIVIC CENTER COURTHOUSE			
14	SARRITA ANASTASIA ADAMS,	Case No.: CCH-24-587004			
15		Case 110 CC11-24-367004			
16	Petitioner,	PETITIONER'S OPPOSITION TO			
17	vs.	DEFENDANTS' MOTION TO QUASH PETITION FOR CIVIL HARASSMENT			
18	AMY GULLEY,	RESTRAINING ORDER PER CODE CIV PROC. §§410.10, 527.6; DECLARATION			
19	Respondent,	OF ATTORNEY OKORIE OKOROCHA;			
20		EXHIBITS A - I IN SUPPORT OF OPPOSITION TO MOTION TO QUASH			
21		HEARING DATE: SEPTEMBER 30, 2024			
22		TIME: 9:30 A.M.			
23		DEPT: 505			
24		CASE FILED: JUNE 6, 2024			
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27					
28	PETITIONER'S OPPOSI	ITION TO MOTION TO QUASH			

- 1-

I. INTRODUCTION

Petitioner, Sarrita Anastasia Adams, Opposes Respondent's Motion to Quash Service of Process for Lack of Personal Jurisdiction and respectfully requests the Court to deny the Motion. Respondent seeks dismissal of the pending Petition for Civil Harassment Restraining Order to avoid jurisdiction in this Court by claiming she has no minimum contacts with California.

II. FACTUAL BACKGROUND

A. Petitioner's California-Based Business

Respondent initiated communications with and harassment of Petitioner, a California resident & California-based business, *Science on Trial, Inc.* ("SoT") Respondent's direct and indirect communication with and harassment of Petitioner clearly establishes the necessary *minimum contacts for personal jurisdiction* under California's long-arm statute, i.e. Code Civ. Proc. §410.10. Petitioner has been a California resident since September 2012. See Exhibit A (p. 1; ¶2); Exh. B. Petitioner filed for incorporation in California of SoT on September 3, 2023 & it is also located in California. See Exh. C & D Petitioner formed SoT to perform forensic scientific consulting & remains based in California. SoT operates primarily out of California, where Petitioner maintains SoT's client relationships and conducts the majority of her business activities because she lives in California. See Exhibit A (p. 1; ¶4) SoT's clients are based both in California and across the U.S., but the core operations of her business, including client management and forensic analysis, occur in California. *However, if the Court finds that additional factual development is needed to resolve the question of jurisdiction then Petitioner respectfully requests the opportunity to conduct jurisdictional discovery to further explore Respondent's contacts with California in this case*

B. Respondent's Spurned Business Proposal to Petitioner

Respondent initiated contact with Petitioner on August 23, 2023 via an e-mail sent to sarrita@scienceontrial.com from Helena Spinelli aka "Eleanor" who has worked in concert with Respondent to harass Petitioner. **See Exh. E.** Spinelli proposed a business collaboration to monetize Petitioner's forensic consulting services by leveraging public interest in Petitioner's commentary on the Lucy Letby murder trial in the UK. Petitioner did not respond. On

PETITIONER'S OPPOSITION TO MOTION TO QUASH

September 20, 2023, Respondent e-mailed Petitioner, asking her questions about her professional qualifications. **See Exh. E.**

Respondent's Campaign of Harassment and Defamation

On Sept. 27, Respondent launched an online campaign of harassment against Petitioner on reddit.com. See Exh. F. She and her associates then expanded the harassment campaign to Twitter/X.com & Facebook.com. See Exh. G. Of course, all of these campaigns are easily located by searching Petitioner's and SoT's name on Google.com. They used various aliases that are clearly connected with Respondent's online harassment as shown in Exhibits F & G. Respondent even hacked into closed SoT meetings that Petitioner had with staff then published recordings from it online. See Exhibits A (p. 2; ¶9) & H. Respondent's harassment is ongoing because she maintains the harassing discussion page on www.reddit.com and her associates even harassed Petitioner via one of her staff as recently as Sept. 15. See Exh. I.

Therefore, Respondent cannot avoid responsibility and use §§410.10 & 527.6 to shield her harassment of Petitioner.

III. ARGUMENT

A. The Court Has Jurisdiction Over Respondent Under §410.10 in This Case

Code Civ. Proc. §410.10, provides that the Court possesses jurisdiction over a nonresident on any basis not inconsistent with the Constitution of this state or of the United States. However, due process requires only that in order to subject a party to a judgment in personam, if she is not present within the forum, she may have certain *minimum contacts* with it such that the maintenance of the suit *does not offend traditional notions of fair play and substantial justice*. (Vons Companies, Inc. v. Seabest Foods, Inc. (1996), 14 Cal. 4th 434, 446.)

If a nonresident's activities are sufficiently wide-ranging, systematic, and continuous, it may be subject to jurisdiction within the state on a cause of action unrelated to those activities. However, where the activity is less extensive, the cause of action must arise out of or be connected with the defendant's forum-related activity. (*Id.*)

The U.S. Supreme Court has described the minimum contacts necessary to establish jurisdiction when involving a nonresident who has "purposefully directed" his/her activities at forum residents (*Burger King* (1985) 471 U.S. 462, 472), or who has "purposefully derived

benefit" from forum activities (*Id.*, at 473), or "'purposefully avail[ed himself or herself] of the privilege of conducting activities within the forum State, thus invoking the benefits and protections of its laws.' " (*Id.*, at 475.) The Court also has referred to the requisite forum contact as involving a nonresident defendant who "'deliberately' has engaged in significant activities with a State or has created 'continuing obligations' between himself and residents of the forum" (*Id.*, at 475-476), concluding that in such cases the defendant "manifestly has availed himself of the privilege of conducting business [in the forum], and *because his activities are shielded by 'the benefits and protections' of the forum's laws it is presumptively not unreasonable to require him to submit to the burdens of litigation in that forum as well." (<i>Id.* at p. 476.)(Emphasis Added)

Here, Respondent clearly established minimum contacts with California by actively initiating and repeating communications with Petitioner, SoT and her staff. Moreover, Respondent's and her associates have flaunted the authority of the Court by violating the TRO by maintaining the platforms of harassment online on reddit.com, X.com, and Facebook.com, not to mention the related Google.com those very posts generate with each new harassing posting about Petitioner and/or SoT.

B. Minimum Contacts Using Social Media May Result in Purposeful Availment

Electronic communication may establish the *necessary minimum contacts* in a state to establish jurisdiction over a defendant. (*Hall v. LaRonde* (1997) 56 Cal.App.4th 1342, 1344.) In *Zehia v. Sup. Court* (2020) 45 Cal.App.5th 54, the Court ruled that the trial court could exercise specific personal jurisdiction under §410.10 because a substantial connection to California arose under the effects test from the nonresident's alleged intentional conduct in sending targeted private social media messages directly to California residents with knowledge that they were California residents, intending to disrupt their relationship and to cause reputational injury in California through defamatory and harassing conversations, which was sufficient to establish purposeful availment of the forum's benefits.

By comparison, the case at bar is similar to *Zehia v. Superior Court* (2020) 45 Cal.App.5th 543 because the Court found that personal jurisdiction was proper over an out-of-state defendant who engaged in targeted, defamatory conduct aimed directly at a California resident. In *Zehia*, the defendant used social media and other means to make personal attacks on PETITIONER'S OPPOSITION TO MOTION TO QUASH

the plaintiff, with the specific intent to harm the plaintiff's reputation in California. The Court held that the defendant's actions, which were focused on causing harm to a California resident, satisfied the requirement for personal jurisdiction, as the defendant knew the harm would be felt primarily in California.

Here, Respondent similarly directed her actions at Petitioner, a California resident, and her California-based business, i.e. SoT. Respondent initiated personal communication with Petitioner, seeking a business relationship. After Petitioner did not accept Respondent's proposal, Respondent engaged in a sustained campaign of harassment, as described above. The harassment was and remains explicitly aimed at Petitioner and/or SoT. Respondent's and her associates coordinated harassment of Petitioner illustrates a deliberate and coordinated effort to harass Petitioner, much like the focused efforts in *Zehia*.

C. This Case is Distinguishable from *Burdick* Due to Respondent's Targeted, Personal Conduct Directly Aimed at Petitioner in California

This case is *clearly distinguishable from Burdick v. Superior Court* (2015) 233 Cal.App.4th 8, where the Court declined to exercise personal jurisdiction over an out-of-state defendant who posted defamatory content on social media. In *Burdick*, the Court found that the defendant's posts were directed at a global audience rather than specifically targeting California.

Here, by contrast, Respondent's actions were not part of a broad, generalized online presence but were instead directly aimed at Petitioner/SoT, a California resident, and her California-based business. Respondent initiated, orchestrated, perpetuated, perpetuates, and continues to maintain the harassment of Petitioner and/or SoT. Respondent's communication with and harassment of Petitioner establishes Respondent's minimum, deliberate and purposeful contact with California.

After Petitioner did not accept Respondent's business proposal, Respondent's actions escalated into a targeted campaign of harassment, as described above. Petitioner details the genesis of Respondent's initiation of communication and the harassment in her declaration that is attached as Exhinit A to this Opposition. Respondent, her aliases, and her associates, specifically named Petitioner many times on the websites stated above, spreading false information about her

personal life, qualifications and business practices with the unmistakable intent to damage SoT and her credibility in her professional community.

Here, in contrast to the defendant in *Burdick*, Respondent's conduct extended beyond public social media posts. Respondent took additional steps to personally attack Petitioner by and through online posts even through others such as "Jess Rose", Helena Spinelli aka "Eleanor" & others. See Exhibit A (p. 1, ¶¶5-8; p. 2, ¶¶9-10) which reveal that Respondent coordinated with others to plan and execute this harassment campaign, further illustrating that her actions were intentional and aimed at personally targeting Petitioner and her Califoria business, i.e. SoT. The nature of Respondent's harassment of Petitioner, the coordinated efforts by Respondent, and the targeted messages in response to Petitioner's non-acceptance of Respondent's initial offer *clearly distinguish this case from Burdick*, where the conduct was impersonal and broadly directed. Respondent's actions were expressly aimed at Petitioner to personally and professionally humiliate her, ruin SoT, making the exercise of personal jurisdiction in California appropriate and necessary for the Court to put a stop to Respondent harassing Petitioner.

D. Respondent Purposefully Availed Herself of California

Respondent's claim that she has no substantial contacts with California is contradicted by the evidence of her own conduct that is even ongoing. See Exhibit A (p. 1, ¶¶5-8; p. 2, ¶¶9-10)

Courts have consistently held that when a non-resident defendant initiates contact with a resident of the forum state to form a business relationship, the defendant is subject to personal jurisdiction in that state.

Here, Respondent is subject to specific jurisdiction in California because, by sending messages, emails, and other communications to Petitioner while Petitioner resided in California, Respondent purposefully directed her activities toward California, satisfying the "effects" test that originated in *Calder v. Jones* (1984) 465 U.S. 783. Respondent was expressly aiming the online harassment of Petitioner in California and knew that she would cause Petitioner and/or SoT in California or else she would not have done it. In fact, Respondent makes her aims clear in her harassment. **See Exhibits F – I.**

Calder stands for the proposition that purposeful availment is satisfied even by a defendant "whose only 'contact' with the forum state is the 'purposeful direction' of a foreign act PETITIONER'S OPPOSITION TO MOTION TO QUASH

having effect in the forum state." Based on these interpretations of *Calder*, the "effects" test requires that the defendant allegedly have (1) committed an intentional act, (2) expressly aimed at the forum state, (3) causing harm that the defendant knows is likely to be suffered in the forum state. [The] "express aiming" requirement is satisfied when "the defendant is alleged to have engaged in wrongful conduct targeted at a plaintiff whom the defendant knows to be a resident of the forum state." (*Dole Food Co., Inc. v. Watts* (2002) 303 F.3d 1104, 1111.)

Here, Respondent's own proactive, sustained and ongoing conduct in harassing Petitioner satisfies the requirement for purposeful availment. *See Dole Food Co., Inc., supra*, at 1111; See also **Exhibits A (p. 1, ¶¶5-8; p. 2, ¶¶9-10); F – I.** Moreover, Respondent and her associates have continued to harass Petitioner, even going as far as hacking into a recent SoT meeting and contacting SoT staff. **See Exhibits A (p. 2, ¶¶9-10), H, & I.**

E. Petitioner's Claims Arise Directly from Respondent's California-Related Conduct

Petitioner's claims of harassment by Respondent arise directly from Respondent's California-related conduct. After Respondent's business proposal was not accepted then she initiated a sustained campaign of harassment aimed at damaging Petitioner's reputation and business based in California. Respondent's defamatory posts on Reddit, X.com, Faceboook.com, and Google.com are and remain a coordinated harassment campaign against Petitioner.

F. Exercising Jurisdiction Over Respondent is Fair and Reasonable

It is fair and reasonable for this Court to exercise jurisdiction over Respondent because of her own actions that constitute harassment that she is more than aware of. Because Respondent sought to initiate communications with and harassment of Petitioner, Respondent could reasonably foresee being haled into a California court. *Moreover, California has a strong interest in providing a forum for its residents who have been harmed by out-of-state actors.*California is the appropriate forum to resolve this dispute via the pending petition. The fact Respondent lives in Pennsylvania is something she should of considered before initiating a campaign of harassment that she maintains, as described above.

IV. REQUEST FOR JURISDICTIONAL DISCOVERY

In the alternative, if this Court determines that additional factual development is needed to resolve the issue of personal jurisdiction, Petitioner respectfully requests the opportunity to conduct jurisdictional discovery. This would allow Petitioner to gather further evidence regarding Respondent's contacts with California in this case. Such discovery may clarify additional direct communications, social media posts, and connections that further establish the basis for personal jurisdiction.

V. CONCLUSION

For the reasons stated above, Petitioner respectfully requests that the Court deny Respondent's Motion to Quash. Alternatively, Petitioner requests the opportunity to conduct jurisdictional discovery to further develop the factual record.

Date: September 23, 2024

Marc D. Pelta,

Attorney for Petitioner

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I, Okorie Okorocha, declare as tollows:

1. I am an attorney duly licensed to practice in California. I am co-counsel with attorney-of-record to the control of the control

in this case. I make this declaration in support of Petitioner's Opposition to Respondent's Motion to Quash for Lack of Personal Jurisdiction. I have personal knowledge of the facts set forth, as follows:

2. Attached hereto as Exhibit A is Petitioner's Declaration in Support of the Opposition to the Motion to Quash.

- 3. Attached hereto as Exhibit B is proof of Petitioner's residency in California.
- 4. Attached hereto as Exhibit C is proof of Science on Trial's location is in California.
- Attached hereto as Exhibit D is Petitioner's LinkedIn profile showing that she and SoT are located in California.
- Attached hereto as Exhibit E is proof of Respondent and her associates initiating communicati
 with Petitioner.
- 7. Attached hereto as Exhibit F is proof of Respondent's and her associates initiation of harassm against Petitioner.
- Attached hereto as Exhibit G is proof of ongoing harassment of Petitioner despite the Court's TRO issued on June 7, 2024.
- Attached hereto as Exhibit H is proof of Respondent or someone acting at her direction hacki into SoT's closed meeting for Petitioner and staff.
- 10. Attached hereto as Exhibit I is proof of Respondent or someone acting at her direction hacking into SoT's closed meeting for Petitioner and staff.

I declare under penalty of perjury under the laws of the State of California that the foregoing is t and correct. Executed on September 23, 2024 at Pasadena, California.

Okorie Okorocha,

Attorney for Petitioner Sarrita Anastasia Adams

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DECLARATION OF OKORIE OKOROCHA

I, Okorie Okorocha, declare as follows:

- I am an attorney duly licensed to practice in California. I am co-counsel with attorney-of-recor
 in this case. I make this declaration in support of Petitioner's Opposition to Respondent's Motion to
 Quash for Lack of Personal Jurisdiction. I have personal knowledge of the facts set forth, as follows:
- 2. Attached hereto as Exhibit A is Petitioner's Declaration in Support of the Opposition to the Motion to Quash.
 - 3. Attached hereto as Exhibit B is proof of Petitioner's residency in California.
 - 4. Attached hereto as Exhibit C is proof of Science on Trial's location is in California.
- 5. Attached hereto as Exhibit D is Petitioner's LinkedIn profile showing that she and SoT are located in California.
- 6. Attached hereto as Exhibit E is proof of Respondent and her associates initiating communicatic with Petitioner.
- Attached hereto as Exhibit F is proof of Respondent's and her associates initiation of harassmentagainst Petitioner.
- Attached hereto as Exhibit G is proof of ongoing harassment of Petitioner despite the Court's TRO issued on June 7, 2024.
- Attached hereto as Exhibit H is proof of Respondent or someone acting at her direction hacking into SoT's closed meeting for Petitioner and staff.
- 10. Attached hereto as Exhibit I is proof of Respondent or someone acting at her direction hacking into SoT's closed meeting for Petitioner and staff.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on September 23, 2024 at Pasadena, California.

Okorie Okorocha,

Attorney for Petitioner Sarrita Anastasia Adams

EXHIBIT A

DECLARATION OF PETITIONER

DECLARATION OF SARRITA ANASTASIA ADAMS

- I, Sarrita Anastasia Adams, declare as follows:
- 1. I am the Petitioner in this action, over the age of 18, and have personal knowledge of the facts set forth in this declaration. If called to testify, I would testify competently to the matters stated herein.
 - 2. I reside in San Francisco, California and I have lived in California since 2012. See Exhibit B.
- 3. I am the owner and operator of *Science on Trial, Inc.* ("SoT"), a forensic consulting business that filed for incorporation with the State of California on September 3, 2023. **See Exh. C.** Respondent knew SoT & I are based on California, as she confirmed in her own posting online in Exh. C the last two pages of that exhibit.
- 4. SoT operates primarily out of California. Most of my clientele and associated professionals are based in California and/or have significant dealings with California. SoT's operations including consultations, client management, and forensic work are conducted from my California-based office. See Exh. D.
- 5. On August 23, 2023, Respondent contacted me via her associate, i.e. Helena Spinelli, who emailed me proposing we collaborate to monetize SoT with her/them. **See Exh. E.** I did not respond.
- 6. On September 20, 2023, Respondent then initiated a chat with me on www.scienceontrial.com. She questioned my qualifications for expert forensic commentary and analysis, and my conclusions about certain forensic aspects of the Lucy Letby murder case in the UK. See Exh. E.
- 7. On September 27, 2023, Respondent started a discussion on reddit.com harassing me/SoT. See **Exh. F.** Since then, Respondent's harassment of Petitioner has grown to numerous negative comments that she and others she encouraged have posted on Reddit.com, X.com, and Facebook.com.
- 8. On October 25, 2023, Respondent continued her campaign of harassment that has gone unabated. For instance, Respondent made and encouraged others to make false statements about me/SoT on reddit.com then later on X.com/Twitter See Exh. G. She/They posted the false, harassing comments under various pseudonyms, including "MrJusticeGossipGirl", "FyrestarOmega", "JessRose", "PaulBeach", et al. on reddit.com and X.com. In fact, from Oct. 25 present, Respondent and her associates posted no less than 3,237 comments on X.com about me/SoT. These posts contained false and malicious statements intended to harm my professional reputation and credibility as a forensic consultant.

Signature:

Email: jay@scienceontrial.com

9. Respondent hacked into closed SoT meetings for staff, she recorded and took screenshots of those meetings then posted it on her subreddit discussion thread to harass me/SOT even further. See Exh. H.

10. Despite the Court's TRO, Respondent has continued to maintain defamatory posts about me online, i.e. reddit.com, X.com, & Facebook.com, including impersonating the business name "Science on Trial, Inc." and posting content on an invitation-only subreddit that is still accessible via Google. Respondent even harassed a specific employee of SOT on September 13, 2024, as recently as This harassment have continued to harm my professional reputation and SoT. See Exh. I.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on September 23, 2024 at San Francisco, California.

Sarrita Adome Scen 24 2024 21-02 (SMT-1)

Sarrita Anastasia Adams, Petitioner

EXHIBIT B

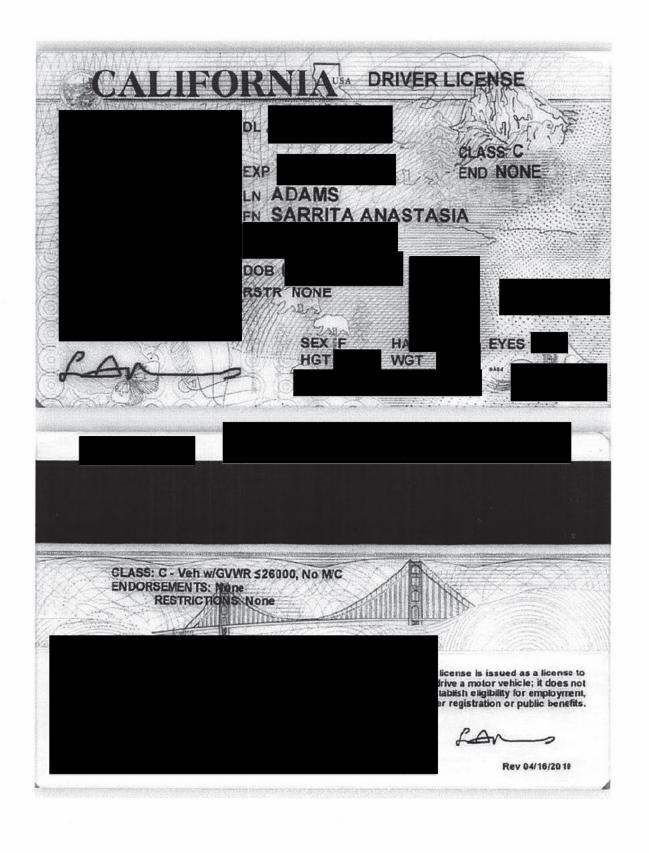
PROOF OF PETITIONER'S RESIDENCY

	DEGETACU					
		FL-180				
	ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and appropriate Stacey Poole 202964 Lerner-Poole, LLP By	FOR COURT USE ONLY				
	535 Pacific Avenue, 2nd Floor San Francisco, CA 94133	ENDORSED				
	TELEPHONE NO.: (415) 391-6000 FAX NO. (Optional): (415) 391-6011	FILED				
	E-MAIL ADDRESS (Optional): stacey@cafamilylaw.com ATTORNEY FOR (Name): JOHN NICHOLAS BILLINGS					
	SUPERIOR COURT OF CALIFORNIA, COUNTY OF ALAMEDA					
	street Address: 24405 Amador Street	MAR 0 6 2018				
	MAILING ADDRESS: 24405 Amador Street CLERK U					
	Citt AND ZIP CODE: Hay Wald, CA 54544 1514	PAM YOUNG				
-	BRANCH NAME: SOUTHERN DIVISION MARRIAGE OR PARTNERSHIP OF					
	PETITIONER: JOHN NICHOLAS BILLINGS	Deputy				
-		5				
	RESPONDENT:SARRITA ANASTASIA ADAMS					
	JUDGMENT LEGAL SEPARATION NULLITY	CASE NUMBER:				
-	☑ DISSOLUTION ☐ LEGAL SEPARATION ☐ NULLITY	HF16830225				
	Reserving jurisdiction over termination of marital or domestic					
	partnership status					
-	Judgment on reserved issues					
	Date marital or domestic partnership status ends: 12/31/2017					
1	. This judgment contains personal conduct restraining orders modifies exi					
	The restraining orders are contained on page(s) of the attachment.	. , , ,				
2	2. This proceeding was heard as follows: Default or uncontested By declaration under Family Code section 2336 X Contested Agreement in court a. Date: November 6-8, 13, 2017 Dept.: 503 Room: b. Judicial officer (name): Thomas J. Nixon Temporary judge c. X Petitioner present in court d. X Respondent present in court e. Claimant present in court (name): f. Other (specify name): Default or uncontested By declaration under Family Code section 2336 Room: Temporary judge X Attorney present in court (name): Stacey Poole Attorney present in court (name): Amanda List Attorney present in court (name):					
3	 The court acquired jurisdiction of the respondent on (date): 9/21/2016 a. X The respondent was served with process. b. The respondent appeared. 					
Т	HE COURT ORDERS, GOOD CAUSE APPEARING					
	4. a. \(\text{\tex{\tex					
 d. This judgment will be entered nunc pro tunc as of (date): e. Judgment on reserved issues. f. The petitioner's respondent's former name is restored to (specify): SARRITA ANASTASIA ADAMS g. Jurisdiction is reserved over all other issues, and all present orders remain in effect except as provided below. h. This judgment contains provisions for child support or family support. Each party must complete and file with the court a Child Support Case Registry Form (form FL-191) within 10 days of the date of this judgment. The parents must notify the court of any change in the information submitted within 10 days of the change, by filing an updated form. The Notice of Rights and Responsibilities—Health-Care Costs and Reimbursement Procedures and Information Sheet on Changing a Child Support Order (form FL-192) is attached. 						
0	m Adopted for Mandatory Use udicial Council of Galilornia JUDGMENT	Page 1 of 2 Family Code, §§ 2024, 2340,				
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FL-180 [Rev. July 1, 2012] CEB Essential

(Family Law)

2343, 2346 www.courts.ca.gov



Report Created On: 12/13/2017 File Number:

SSN: Your SSN has been masked for your prote	ection.	You have been on our files since 05/20/2011 Date of Birth
Names Reported: SARRITA A. ADA		
Addresses Reported: Address		Date Reported
Telephone Numbers Reported:		
Employment Data Reported: Employer Name SCIENTIST	Date Verified 02/11/2015	
Typically, creditors report any changes in creditor's next reporting. This information the account information that could be reported.	n may include things such as balances, paym	nis means that some accounts listed below may not reflect the most recent activity until the tents, dates, remarks, ratings, etc. The key(s) below are provided to help you understand some of
Rating Key Some creditors report the timeliness of y by your creditors. Please note: Some bu	your payments each month in relation to your If not all of these ratings may be present in yo	agreement with them. The ratings in the key below describe the payments that may be reported sur credit report.
		, your account numbers have been partially masked, and in some cases scrambled. Please note: if the due date. Accounts reported as Current may still incur late fees or interest charges if not paid
Date Opened: Responsibility: Account Type: Loan Type:	Date Updated:	Pay Status: Terms:

EXHIBIT C

PROOF OF CALIFORNIA INCORPORATION







STATE OF CALIFORNIA Office of the Secretary of State ARTICLES OF INCORPORATION CA GENERAL STOCK CORPORATION

California Secretary of State 1500 11th Street Sacramento, California 95814 (916) 653-3516

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For Office Use Only

-FILED-

File No.: 5889445 Date Filed: 9/3/2023

Corporation Name Corporation Name	Science on Trial Inc.			
Initial Street Address of Principal Office of Corporation Principal Address	SAN FRANCISCO, CA			
Initial Mailing Address of Corporation Mailing Address Attention	SAN FRANCISCO, CA			
Agent for Service of Process California Registered Corporate Agent (1505)	UNITED STATES CORPORATION AGENTS, INC. Registered Corporate 1505 Agent			
Shares The total number of shares the corporation is authorized to issue is: 100 Does the corporation have more than one class or series of shares? No				
Purpose Statement The purpose of the corporation is to engage in any lawful act or activity for which a corporation may be organized under the General Corporation Law of California other than the banking business, the trust company business or the practice of a profession permitted to be incorporated by the California Corporations Code.				
Additional information and signatures set forth on attached pages, if any, are incorporated herein by reference and made part of this filing.				
Electronic Signature By checking this box, I acknowledge that I am electronically signing this document as the incorporator of the Corporation and that all information is true and correct.				
Legalzoom.com, Inc., By: Cheyenne Moseley, Asst. Secreto Incorporator Signature	09/03/2023 Date			

13:34





mrjusticegossipgirl 3,237 posts

Follow

Posts Replies Media

Likes

₩ L¥0 V 01 III 4,410



mrjusticegossipgirl @mrjg... · 07/02/2024 ···· Lol Sarrita Adams finally changed her handle for #scienceontrial away from @EdgarMoose43433.

As a reminder, she has a regular degree in natural sciences and an incomplete phd in microbiology.

Anything else is cosplay.



Science on Irial

Follow

Science On Trial

@Forensic Sci_

Highly skilled life scientists - meeting the



EXHIBIT D

Petitioner's & SoT's LinkedIn Profile

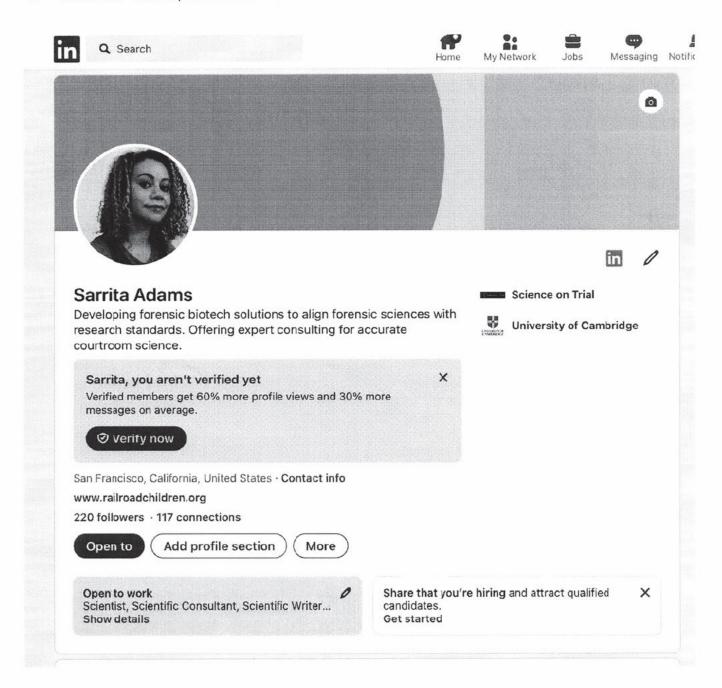


LinkedIn Screenshot

From Sarrita Adams

Date Fri 9/20/2024 2:10 PM

To Marc Pelta <marc@peltalaw.com>



This email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error, please notify the sender immediately and delete it from your system. Unauthorized use, disclosure, or copying of this email or its contents is strictly prohibited. Please note that any views or opinions presented in this email

EXHIBIT E

Communications Initiated by Respondent/Associate

This email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error, please notify the sender immediately and delete it from your system. Unauthorized use, disclosure, or copying of this email or its contents is strictly prohibited. Please note that any views or opinions presented in this email are solely those of the author and do not necessarily represent those of Science on Trial Inc. Science on Trial Inc. accepts no liability for any damage caused by any virus transmitted by this email.

Helena

Respondent 9/20/23

22:38



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Human Science on Trial

A

I am trying to reconcile your current objective with your past statements, or understand how or why they changed

It says much that people such as yourself think you are doing society a justice by "holding me to account" S

What are your objectives?

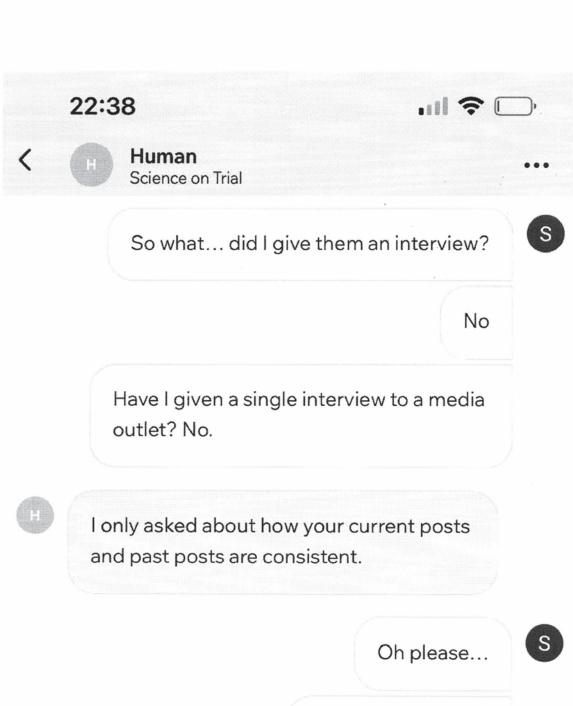
What is your name?

Who are you?

Why should I answer to a person who stalks me on the internet and hides behind their computer screen?

Н

You have a strange definition of stalking, I'll say that. Your name was published by the UK press



What is your name?

Who are you

Are your objectives today, the same as they were four months ago?

Utter nonsense. I am not answerable to people like you.





Well. I wish you luck. It must be difficult to sustain the permission to by anonymous here if you don't trust it

I have no idea what that even means

lave no idea what that even means

Clearly. Good day

Just note, that turning up on people's websites and demanding they answer to your questions you are hiding your identity and then exposing their Reddit account is a form of cyberstalking

Another interesting definition. Noted.

The only reason you know that the Reddit account is mine is because of a cyberstalking campaign. My name does not appear anywhere on the rexvlucyletby



Human Science on Trial

9/20/2023, 11:47 AM

Hi there, you are doxing... if you want to ask me a question go ahead and do it... but stalking people on the internet is actually a crime!

Nothing has changed.

The bits you highlighted remain

I do not think you are interested in the campaign and we do not have time for people such as yourself. If you want to contribute something productive, have at it. But if you want to disrupt and waste time then please go elsewhere. This situation is by far more significant than your silly attempts at exposing the fact that four months ago myself and y colleagues had faith in the British justice system.

H

Are we not allowed to discuss reddit? I'm sorry, since you said there that you had

EXHIBIT F

Harassment Initiated by Respondent

Facebook.com



Rex vs Lucy Letby page - private chat

Q MrJusticeGossipGirl

3 results X





Eleanor Bovington added a participant.

Eleanor



@Mrjusticegossipgirl Welcome

A Someone replied to Eleanor

@Mrjusticegossipgirl Welcome

Hi everyone. I understand our current interests are aligned. I am here to assist in any way I can

A Eleanor replied to participant

Hi everyone. I understand our current interests are aligned. I am here t...

Thank you! It is all a little unsettled at the moment, so it would be good to hear that your views about the verdicts to reassure people the work reddit is doing is not against providing Lucy a fair trial.

Mrjusticegossipgirl

Right. My opinion on the verdicts are that if they are ever overturned, it won't be connected in any way to the actions of Sarrita Adams.

That of course does imply that if there is a valid reason to overturn a verdict or verdicts, that they should be vacated. I am not here to argue if that is or is not the case, and have no interest in subverting the discussions of this chat to that





Rex vs Lucy Letby page - private chat

Q paul breach



WKaren battye Louines Wellotte:

Eleanor Bovington added Paul Bench to the group.

Eleanor



@Paul Breach Welcome!





Paul



Hello. Thanks for the add.

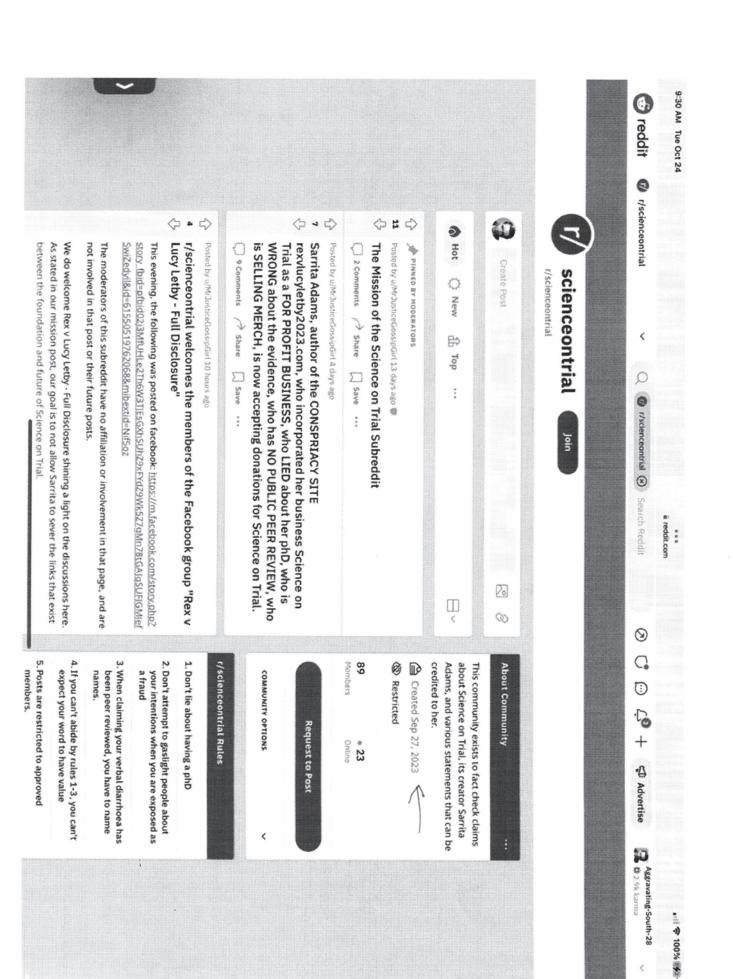
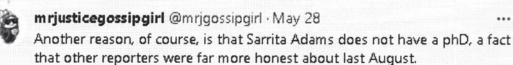


EXHIBIT G

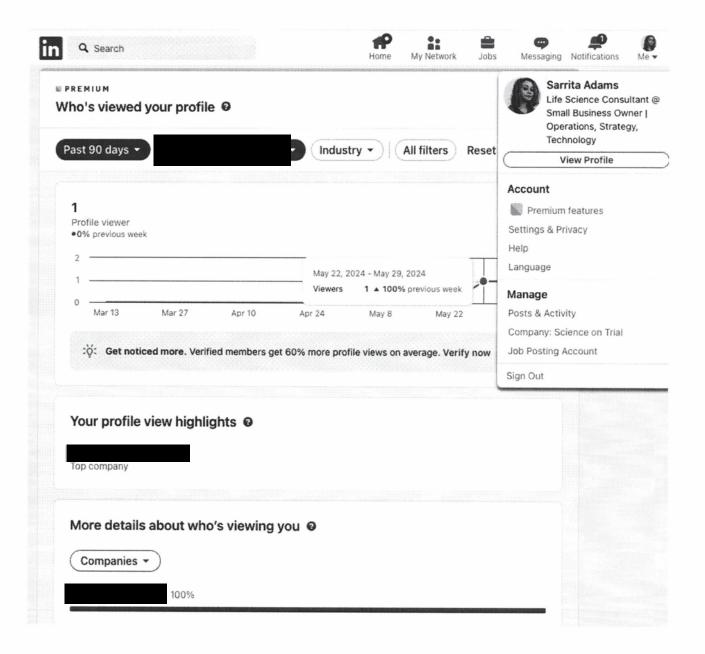
Continuation of Harassment



- Identification of Amy Gulley



"According to her LinkedIn profile" 🔠



https://www.linkedin.com/in/amy-gulley-a2b3629/

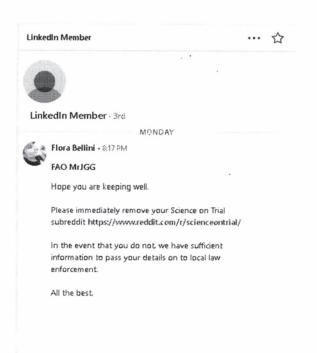
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About

7 Message

My experience in the construction industry began with an office manager position in a masonry company, which provided a good foundation for the ability to provide solid financial masonry estimates. As Estimator, I had the opportunity to price b...see more

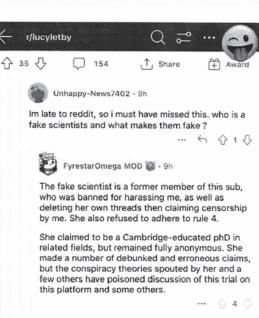




conditioner, and full hour treatment of tgin honey miracle hair mask

⊕ 1 ⊕ Q Award _1 Share ---















The Alleged "Scientist" Has Revealed A Previously Undisclosed Connection To Countess Of Chester Hospital

Discussion

A quick recap [skip bulleted section if already familiar with the background deets, go straight to the bold part]:

- There was previously a woman who claimed to be a scientist that was routinely posting here to argue against the validity of evidence submitted to court essentially arguing that the trial was a witch hunt and furthering the narrative that Letby was innocent of the charges against her.
- This "scientist" claimed to be a researcher with experience treating rare pediatric diseases who, alongside her staff, put together a document that could prove Letby was not the killer; a mystery virus that went undetected was the culprit.
- When challenged, this "scientist" would routinely threaten posters with doxxing and to report them to
 their regulatory bodies. Her antics worsened as she would erratically delete her own posts and then
 accuse the lone moderator at the time of deleting her posts to censor her content; furthering a narrative
 of victimhood before earning a ban for harassment.
- She established an opposition subreddit which she claimed was to be rooted in scientific evidence and research but never posted any of the documentation she promised and instead banned any users who pointed out mistakes in her calculations and logic.
- She also went on to create a website where she refined her claims and began promoting it across various social media platforms. She has since joined with the purveyors of similar content in order to create a new forum meant to advocate for Letby's exoneration post-conviction in order to secure an appeal on the basis that "bad science" lead to an unsafe conviction.
- Recently, <u>she was identified by the Telegraph</u> in an article which cast heavy doubt on her alleged qualifications and identified her as the leader of the main campaign to exonerate Lucy Letby despite her conviction on multiple murder and attempted murder charges.
- Another user, who has since deleted their account, found public records which further revealed that this
 individual has been declared mentally incompetent by the state of California. <u>Their post can be viewed</u>
 here.
- This documentation also alleged that she is a perpetrator of domestic abuse (important later) as well as
 having failed to complete her doctorate suggesting strongly that she is unemployed/"self"-employed
 and that she may not even have a PhD at all as there are several references to not completing her
 doctorate.
- Other users have claimed to find no trace of the PhD in Cambridge associated databases while Richard Gill has offered to share her PhD with any who ask. A second user attempted to find this PhD and also failed

In the past 24 hours, a previously undisclosed connection between the "scientist" to the Countess of Chester has been revealed which call into question the potentially biased motivation that has driven her campaign from the start.

In her own words, she discloses that she has gone through a contentious divorce with her ex-husband -whose

🚅- Summary of Google Results

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Reddit · r/scienceontrial

20+ comments · 7 months ago :

Sarrita Adams says "Fuck you, pay me" about questioning ...

Sarrita Adams says "Fuck you, pay me" about questioning her on Science on Trial. Goodness! Sarrita Adams has yet to learn a lesson she has been ...

Sarrita Adams has publicly admitted she does not hold the title ... 7 Oct 2023 Does Sarrita Adams, author of rexylucyletby2023.com and ... 28 Sept 2023 I raised the matter of Sarrita Adams' credentials: r/scienceontrial 8 Oct 2023 Sarrita Adams has erased all evidence of her prior claims of ... 27 Oct 2023 More results from www.reddit.com



Science on Trial

https://www.scienceontrial.com :

Science on Trial | Sarrita Adams

Founder, Sarrita Adams, is the brain behind Science on Trial, which provides consistent, highquality scientific analysis and expertise in legal cases with ...



X · gill1109

20+ likes · 7 months ago

Richard Gill

RexysLucyLetby Sarrita Adams is not fraudulent. I am not taking any money from anyone. You are the fraud around here, a cheat and a thief.



X (Twitter)

https://twitter.com/mrjgossipgirl

mrjusticegossipgirl (@mrjgossipgirl) · X



Sat watching Bridgerton before bed, maybe I should have gone with "Mr Justice Whistledown"?

Sat watching Bridgerton before bed and wondering why I didn't go with "Mr Justice Whistledown"? pic.twitter.com/lsLb3mo...



Thought Sarrita caught me but it's just a fire in the neighborhood. Hoping everyone affected is safe.

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Richard Gill

Cambridge University

Letby

Californía

Linkedin

About 159 results (0.35 seconds)



reddit.com

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Sarrita Adams has publicly admitted she does not hold the ...

Not as an implied admission that she lacks a PhD but as an affirmation that she holds the qualification. It is a lie, of course, and I suspect ...



reddit.com

https://www.reddit.com / scienceontrial > comments > s...

Sarrita Adams receives an email and throws a tantrum on ...

Her response entirely misrepresents the reality, as usual. Sarrita is not fit to run any entity...she seems barely able to run her own affairs.



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https://www.reddit.com : scienceontrial > comments > s...

Sarrita Adams says "Fuck you, pay me" about ... - Reddit

Sarrita Adams says "Fuck you, pay me" about questioning her on Science on Trial. Goodness! Sarrita Adams has yet to learn a lesson she has been ...



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Does Sarrita Adams, author of rexvlucyletby2023.com and ...

Does Sarrita Adams, author of rexvlucyletby2023.com and creator of Science on Trial, have a phD? In the early versions of rexvlucyletby2023.com, ...



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https://www.reddit.com > scienceontrial : comments : s ...

Sarrita Adams has erased all evidence of her prior claims ...

Sarrita Adams has erased all evidence of her prior claims of having a phD. Here are several times it happened. First, the original version of ...



reddit.com

https://www.reddit.com i scienceontrial > comments > i...

I raised the matter of Sarrita Adams' credentials - Reddit

I was perfectly polite and civil and offered Sarrita Adams the opportunity to provide evidence or explain herself. I am a very forgiving person ...



reddit.com

https://www.reddit.com i scienceontrial > comments > s...

Science on Trial can't get financial backers because of ...

Honest to God, how this cluster b riddled fraud has been able to hoodwink anybody into believing her, nevermind giving her money utterly ...

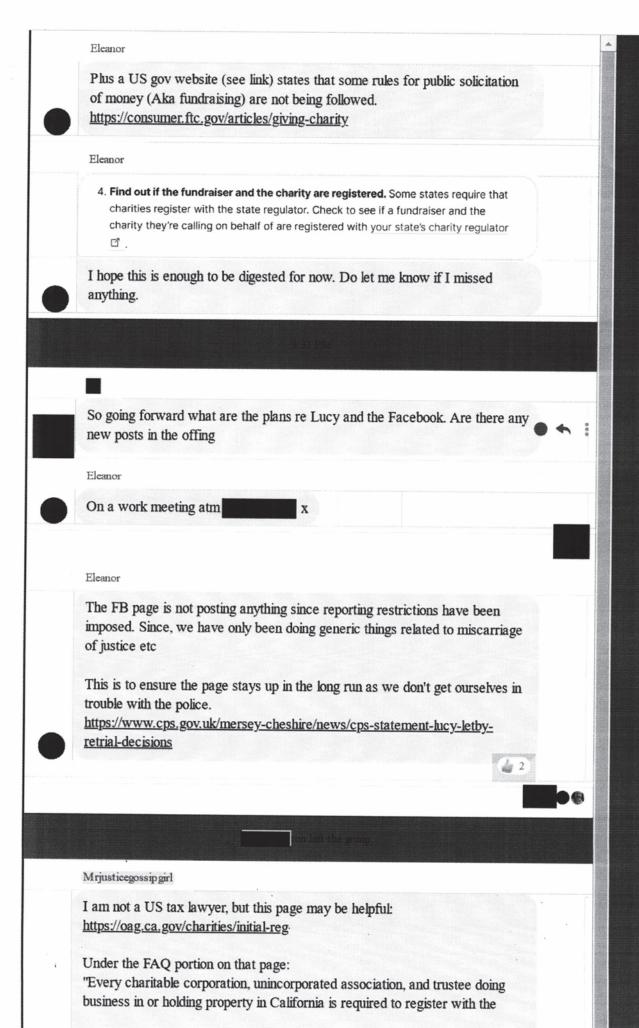


reddit.com

https://www.reddit.com > scienceontrial : comments : L. . .

Throwback to another legal "intervention" attempted by ...

Agreed. Although I'm 100% certain Letby is guilty as sin, I've no objection to people querying the verdicts in good faith. But as the X account ...





Hi Ruth. How are you? Nice to see you've found a new creative outlet. Replying to @Ruth39484957 @RexvsLucyLetby and 3 others mrjusticegossipgirl @mrjgossipgirl · Nov 9

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Replying to @Ruth39484957 @SisuNorthern and 2 others Rex v Lucy Letby - Full Disclosure @RexvsLucyLetby · Nov 9

the largest number of followers interested in the matter A group of professionals & I ran the FB page bf SoT was created. We host LL's cause for justice we are focusing on exposing its illegal dealings. Considering the turn that SoT has taken, the harm it has/is causing to the

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magmolecularia Emonec

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