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

16
17 SARRITA ANASTASIA ADAMS,
18 Petitioner,

19 vs.

20 AMY GULLEY,
21 Respondent.
22

Case No. CCH-24-587004

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

**RESPONDENT AMY GULLEY'S
REPLY MEMORANDUM IN SUPPORT
OF SPECIAL MOTION TO STRIKE
[CCP § 425.16]; SUPPLEMENTAL
DECLARATION OF AMY GULLEY;
SUPPLEMENTAL DECLARATION OF
ADAM STEINBAUGH;
EXHIBITS 49—70**

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1 **INTRODUCTION**

2 Adams’s untimely opposition¹ concedes she is abusing the expedited civil
3 harassment process to attempt to litigate a *defamation* claim. (Pet’r’s Opp’n to anti-SLAPP
4 Mot. [“Opp.”] at pp. 10–11.) Such petitions are not appropriate vehicles to litigate
5 complicated defamation claims, as speech directed to the public—even if shown to be
6 unprotected—is not “qualitatively” the type of *conduct* the harassment statute addresses.
7 (*Thomas v. Quintero* (2005) 126 Cal.App.4th 635, 662–663.) And Gulley’s criticism of
8 Adams’s involvement in a high-profile criminal trial addresses matters of public concern,
9 receiving the *highest* protection under the First Amendment. (*Snyder v. Phelps* (2011) 562
10 U.S. 443, 451–452.) Adams thus cannot show, as the civil harassment statute requires, that
11 Gulley’s speech is devoid of legitimate purpose.

12 Yet, even if Adams clears all these hurdles, she cannot establish that Gulley’s
13 speech—questioning the legitimacy of Adams’s claimed credentials—is defamatory because
14 Adams cannot show the speech is false. Consequently, Gulley’s protected speech cannot
15 form the basis of a course of *conduct* under the harassment statute.

16 **ARGUMENT**

17 Adams offers no serious argument the anti-SLAPP statute does not apply to speech
18 about Adams’s self-intervention in public debate over a high-profile trial. Adams then fails
19 to carry her burden to show that Gulley—not third parties—engaged in harassing conduct.

20 **I. Gulley Has Satisfied Her Burden Under the Anti-SLAPP Statute.**

21 As Gulley’s opening brief details, this lawsuit seeking to enjoin public criticism on a
22 public issue is within the anti-SLAPP statute’s purview. Adams relies on outdated caselaw
23 to argue that criticizing her efforts to influence public debate over a high-profile murder
24 trial does not implicate issues of public interest. (Opp. at pp. 4–7.) But that argument fails.

25 For one, it is at odds with recent California Supreme Court authority mandating a
26 liberal approach to identifying interests implicated by speech. Adams also ignores binding
27

28 _____
¹ The Court has “broad discretion” to “reject late-filed papers.” (*Rancho Mirage Country Club Homeowners Assn. v. Hazelbaker* (2016) 2 Cal.App.5th 252, 262 [affirming trial court’s refusal to consider self-represented litigant’s late opposition papers and supporting evidence].) Adams’s opposition should be disregarded because she filed it a week late—after Gulley’s reply deadline—despite multiple continuances.

1 precedent that an expert’s credentials are relevant to their involvement in public debate.
2 And she fails to respond to the argument that there is no “public interest” requirement for
3 speech concerning legal proceedings—like the British murder trial or Adams’s divorce.

4 **A. Adams’s argument is founded on disapproved precedent and**
5 **ignores that the anti-SLAPP statute should be liberally construed.**

6 Seeking to avoid the anti-SLAPP statute entirely, Adams urges the Court to take a
7 narrow view of the subject matter of Gulley’s speech. (Opp. at p. 5.) But the California
8 Supreme Court has expressly rejected the authority she cites.

9 To facilitate the anti-SLAPP statute’s speech-protective purpose and give effect to
10 the First Amendment’s “broad protection” of matters of public or “legitimate news
11 interest”—like the “media frenzy” over Adams’s conduct—the legislature has commanded
12 that the anti-SLAPP statute “shall be construed broadly.” (Code Civ. Proc., § 425.16,
13 subd. (a); *Snyder, supra*, 562 U.S. at p. 452; Steinbaugh Decl. ISO anti-SLAPP Mot. ¶ 17,
14 Ex. 17 [Adams describing the “media frenzy” over her].) That “broad” approach ensures
15 that courts “do not become inadvertent censors.” (*Snyder, supra*, 562 U.S. at p. 452.) Thus,
16 the California Supreme Court has provided a two-part framework for determining whether
17 speech is in connection with a public issue in *FilmOn.com Inc. v. DoubleVerify Inc.* (2019)
18 7 Cal.5th 133 (“*FilmOn*”), and modified that framework in *Geiser v. Kuhns* (2022) 13
19 Cal.5th 1238.

20 “First, [a court should] ask what ‘public issue or . . . issue of public interest’ the
21 speech in question implicates[.]” (*FilmOn, supra*, 7 Cal.5th at p. 149, quoting Code Civ.
22 Proc., § 425.16, subd. (e)(4) [ellipsis in original].) Second, it should “ask what functional
23 relationship exists between the speech and the public conversation about some matter of
24 public interest.” (*Id.* at pp. 149–150.) In this second stage, context is crucial because it
25 “allows [courts] to assess the functional relationship between a statement and the issue of
26 public interest on which it touches[.]” (*Id.* at p. 140.)

27 In establishing this two-part analysis, the Court disapproved decisions that
28 struggled to ascertain what speech “is *really* ‘about’” by trying to isolate a speaker’s

1 personal involvement in a matter from the context of the broader public issues. (*FilmOn*,
2 *supra*, 7 Cal.5th at p. 149 [emphasis added], *disapproving Bikkina v. Mahadevan* (2015)
3 241 Cal.App.4th 70, 85 (“*Bikkina*”); *World Financial Group, Inc. v. HBW Ins. & Financial*
4 *Services, Inc.* (2009) 172 Cal.App.4th 1561, 1572 (“*World Financial*”); *Mann v. Quality Old*
5 *Time Service, Inc.* (2004) 120 Cal.App.4th 90, 111 (“*Mann*”).) That approach “is less than
6 satisfying” because, “if the social media era has taught us anything, it is that speech is
7 rarely ‘about’ any single issue,” even if the speaker has a personal motivation to care about
8 a public issue. (*Id.*)

9 In *Geiser*, the Court emphasized that statements should be viewed in context, not in
10 isolation, consistent with broadly construing the anti-SLAPP statute to protect speech.
11 “*FilmOn*’s first step is satisfied so long as the challenged speech or conduct, considered in
12 light of its context, *may reasonably be understood to implicate a public issue*, even if it
13 *also* implicates a private dispute.” (*Geiser, supra*, 13 Cal.5th at p. 1253 [emphasis added];
14 see also *id.* at pp. 1248–1249 [again disapproving *Bikkina*, *World Financial*, and *Mann*].)
15 The Court conceded defendants will “virtually always” be able to make this showing. (*Id.* at
16 p. 1250.) It is the rare case— “[o]nly when an expressive activity, viewed in context, cannot
17 reasonably be understood as implicating a public issue”—that “an anti-SLAPP motion
18 fail[s] at *FilmOn*’s first step.” (*Id.* at pp. 1253–1254.)

19 Applying these rules, the Court held a demonstration outside of a relatively
20 unknown CEO’s home “to protest [his] real estate company’s business practices” after
21 evicting two residents from their home implicated a public issue. (*Geiser, supra*, 13 Cal.5th
22 at p. 1243.) Even though the genesis of the protest was an individual family’s eviction,
23 about 25 other people protested with the family. (*Id.* at p. 1251.) From that, a reasonable
24 inference could be drawn that the protest implicated issues of residential displacement and
25 gentrification—even though it *also* involved a matter of private concern to the individual
26 protesters evicted from their home. (*Id.* at p. 1249–1250.)

27 Adams does not follow the *FilmOn* framework, instead invoking authority *FilmOn*
28 and *Geiser* explicitly disapproved. Adams relies on *Bikkina* and *Mann* to argue the Court

1 should determine a singular issue of public interest. (Opp. at p. 5, citing *Bikkina, supra*,
2 241 Cal.App.4th at p. 84, and *Mann, supra*, 120 Cal.App.4th at p. 111.) But *Bikkina* and
3 *Mann* were two of the three cases the California Supreme Court specifically criticized for
4 their “less than satisfying” approach to identifying a public issue. (*FilmOn, supra*, 7 Cal.5th
5 at p. 149.) Adams’s other authorities are branches of the same disapproved tree.²

6 Applying current, controlling case law shows the anti-SLAPP statute applies here.
7 On *FilmOn*’s first step—identifying the issue—Gulley’s speech may reasonably be
8 understood to implicate public issues, namely, the Lucy Letby trial and Adams’s efforts to
9 intervene. (*Geiser, supra*, 13 Cal.5th at p. 1253.) Looking at the contextual factors in
10 *FilmOn*’s second step, Gulley’s speech furthered public debate on these issues, too: Gulley’s
11 speech took place in public internet forums dedicated to discussing exactly those issues.
12 Further, just as the presence of other protesters (*i.e.*, other than the evicted residents) in
13 *Geiser* indicated broader public interest (*Id.* at p. 1251), established media outlets have
14 widely covered both Adams’s intervention and her credentials.

15 Finally, this is not an instance where an anti-SLAPP movant strains to attach their
16 purely private dispute to an unrelated public issue. Adams’s petition says Gulley had *no*
17 “relationship” with Adams and only “became aware of [Adams] because [Adams] was
18 featured in various media articles.” (Pet. at p. 2.) That demonstrates that Gulley’s criticism
19 arose *because of* Adams’s involvement in the public debate.³

22
23 ² *Consumer Justice Center v. Trimedica International, Inc.* (2003) 107 Cal.App.4th 595 (“*Consumer*
24 *Justice*”) and *Commonwealth Energy Corp. v. Investor Data Exchange, Inc.* (2003) 110 Cal.App.4th 26
25 (“*Commonwealth*”) were the foundation for the later decision in *World Financial*. (*World Financial, supra*,
26 172 Cal.App.4th at pp. 1570–1572.) And *World Financial* was the third case the Supreme Court disapproved
27 in *FilmOn*. (*FilmOn, supra*, 7 Cal.5th at p. 149.) The same is true for Adams’s reliance on *Dual Diagnosis*
28 *Treatment Center, Inc. v. Buschel* (2016) 6 Cal.App.5th 1098—it, too, relied on the line of cases disapproved
in *FilmOn*. (*Id.* at pp. 1105–1106, relying on *Mann, supra*, 120 Cal.App.4th at p. 90; *Commonwealth, supra*,
110 Cal.App.4th at p. 34; *Consumer Justice, supra*, 107 Cal.App.4th at p. 595.)

³ In her petition, Adams alleged that Gulley was a pawn in a Dutch professor’s scheme to retaliate against
Adams for rejecting the professor’s business proposal. (Adams Decl. in Supp. of Pet. at pp. 1–2.) Now she
alleges—with no evidence—that *Gulley* made a business proposal that Adams rejected. (Opp. at p. 9.) In her
opposition to the Motion to Quash, Adams claims a third person, Helena Spinelli, made the business
proposal. (Adams Dec. in Opp. Mot. Quash ¶ 5, Ex. E.) Adams’s baseless theories are difficult enough to keep
track of *without* the unexplained changes in the characters.

1 **B. Adams ignores controlling precedent holding that speech about**
2 **her credentials is connected to matters of public concern.**

3 Adams’s arguments that Gulley’s speech implicates purely private concerns fail as a
4 matter of law because they ignore *Copp v. Paxton*, which, as Gulley’s brief explained, holds
5 that the “credentials” of an expert who seeks to influence public debate are *always* relevant
6 to the broader “public controversy.” (*Copp v. Paxton* (1996) 45 Cal.App.4th 829, 846; Anti-
7 SLAPP Mot. at pp. 7, 12.) Adams’s opposition boasts that she is an expert and that she
8 seeks to influence public debate through her “commentary” and involvement in “high-
9 profile legal cases.” (Opp. at pp. 6, 8.) Yet she has no answer for *Copp*’s rule and concedes
10 the anti-SLAPP statute applies where—as here, given her self-promotion in the media—an
11 individual “voluntarily thrust[s] themselves into public controversy.” (*Id.* at p. 6.)

12 **C. Adams does not dispute that Gulley’s speech is connected to legal**
13 **proceedings, which are always of public interest.**

14 On Gulley’s showing that one category of the anti-SLAPP statute—speech in
15 connection with issues considered by a court—does not require “public interest” (Mot. at
16 p. 9; Code Civ. Proc., § 425.16, subd. (e)(2)), Adams offers no response. She thus concedes
17 the issue, and Gulley meets her burden on the first anti-SLAPP prong.

18 **II. Adams Has Not Established a Probability of Prevailing on Her Petition.**

19 Adams fails to carry her burden in opposing Gulley’s anti-SLAPP motion. At bottom,
20 speech *about* Adams—the express focus of Adams’s petition—does not implicate the type of
21 conduct contemplated by the statute. Moreover, because that speech occurs in the context
22 of debate on matters of public concern, it cannot be said to be without legitimate purpose,
23 even if it were shown to be unprotected. And Adams cannot in any case show that any of
24 Gulley’s speech is unprotected, as she cannot identify or *prove* a false statement of fact—let
25 alone the actual malice that a limited public figure like Adams must show.

26 **A. The expedited civil harassment process is not an appropriate**
27 **vehicle to litigate complex defamation claims.**

28 Adams cannot succeed because the ‘problem’ she seeks to address—people talking
about her—cannot be solved through a process not designed to adjudicate “potentially
complex issues.” (Cal. Judges Benchguides, Benchguide 20 (rev. 2016), § 20.2.) Moreover,
the civil harassment statute “requires significantly more” than speech directed to the

1 public, even if “not constitutionally protected.” (*Thomas, supra*, 126 Cal.App.4th at
2 pp. 662–663.)⁴ Outward speech is “qualitatively” not the type of conduct “contemplated by
3 the statute.” (*Id.*) That dooms Adams’s likelihood of success as a matter of law.

4 Adams says she *must* be able to pursue summary adjudication of her defamation
5 claim *here* to avoid the procedural burdens attendant with civil litigation. (Opp. at pp. 10–
6 11.) However, what Adams sees as procedural burdens are constitutionally mandated
7 safeguards to protect speech from the chill of abusive litigation, and Adams’s conduct
8 demonstrates their necessity. A defamation defendant could use discovery—not available
9 in civil harassment petitions—to test dubious claims of falsity. And the necessity of a jury
10 as a bulwark against censorial defamation suits has been recognized since the colonial trial
11 of John Peter Zenger. (*New York Times Co. v. Sullivan* (1964) 376 U.S. 254, 301 [J.
12 Goldberg, concurring].)

13 **B. Adams cannot show Gulley’s speech lacks legitimate purpose.**

14 Adams also cannot succeed because she attacks speech where it is most protected—
15 the public arena. Speech can amount to unlawful harassment only if the petitioner shows it
16 is devoid of legitimate purpose. (Code Civ. Proc., § 527.6, subd. (b)(3).) But speech always
17 serves a legitimate purpose when it addresses matters of public concern, even if it is deeply
18 upsetting to its subjects. (*Snyder, supra*, 562 U.S. at p. 453.) And because California law
19 recognizes speech criticizing an expert’s credentials advances public debate, Gulley’s
20 speech cannot lack legitimate purpose—even *if* it were unprotected. (*Copp, supra*, 45
21 Cal.App.4th at p. 846; *Thomas, supra*, 126 Cal.App.4th at pp. 662–663 [speech to the
22 public is not part of a “course of conduct” even if “not constitutionally protected”].)

23 **C. Adams fails to otherwise show that Gulley’s speech is outside the
24 First Amendment’s protection.**

25 Even if it were appropriate for Adams to litigate her defamation claims in this
26 proceeding, she fails to show any specific statement is both demonstrably false and made
27 with actual malice, as she must as a limited public figure. Notably, Adams specifically
28 identifies *only one* statement she contends is false: Gulley’s assertion that Adams’s claimed

⁴ In the same vein, the civil harassment statute is narrowly limited to conduct “directed at a specific person,” not *other* people. (Code Civ. Proc., § 527.6, subd. (b)(3).)

1 PhD is “incomplete.” (Adams Decl. ¶ 7, Ex. E.)⁵ But Adams cannot establish that statement
2 is false. Adams now claims she earned a PhD in June 2017 but testified six months *later*
3 that she had not completed her PhD—and facial anomalies on the diploma she submitted
4 to this Court undermines its claimed authenticity.

5 ***i. The diploma Adams offers from Cambridge University’s Gonville***
6 ***and “Cauis” [sic] College is of dubious authenticity.***

7 Adams now testifies she “possess[es] a PhD in Biochemistry from Cambridge
8 University,” submitting a diploma that purports to be dated June 29, 2017. (Adams Decl.
9 ¶ 7, Ex. E). Yet the diploma Adams proffers here bears unsettling indicia it is not authentic.

10 Foremost is the spelling of the college’s name—the diploma states it is from
11 Cambridge University’s “GONVILLE AND CAUIS COLLEGE.” (Steinbaugh Suppl. Decl.
12 ¶ 6, Ex. 63 [emphasis added].)⁶ But that flips the letters in the name of “Gonville and *Caius*
13 College.” (¶ 7, Ex. 64 [official website showing the correct spelling of “Caius”].)⁷

14 The diploma also purports to be signed by the University’s Registry, Jonathan
15 Nicholls. (¶ 6, Ex. 63.) But Nicholls retired from Cambridge University on December 31,
16 2016—six months before the diploma’s date. (¶ 8, Ex. 65.) And photographs of the June 29,
17 2017, ceremony—posted by the College itself—show diplomas were signed by Nicholls’s
18 successor, Acting Registry Emma Rampton. (¶¶ 9–11, Exs. 66 & 68; see also Ex. 67 [July
19 1, 2017, diploma bearing Emma Rampton’s signature].)

20 ***ii. Adams is judicially estopped from claiming she was***
21 ***awarded a PhD in June 2017.***

22 Then there is the date on the diploma. In November 2017—five months *after* the
23 diploma’s “29 June 2017” date—Adams testified she had *not* completed her PhD.

24 ⁵ Adams asserts that Gulley stated Adams “mishandled forensic evidence and conducted improper analyses”
25 and was “spreading misinformation about the legal cases she analyzed,” broadly citing a collection of
26 screenshots. (Opp. at pp. 8–9, citing Adams Decl. Exs. A & B.) But Adams does not identify the statement at
27 issue or show it is false. None of the statements in the exhibits implies Adams ever handled forensic evidence.
Stating she is “WRONG about the evidence” (Ex. A) or has “made a number of debunked and erroneous
claims” is opinion—part and parcel of a public debate, not a verifiably false statement of fact.

28 ⁶ Except where noted, further evidentiary citations are to the attached declaration of Adam Steinbaugh.

⁷ On comparable facts, a federal district court found that a purported PhD diploma that “misspelled ‘Board’
as ‘B-A-O-R-D’” was “obviously fake.” (*Broxterman v. Sec’y, Dep’t of Corr.* (M.D.Fla. Sep. 26, 2023, No.
8:20-cv-2940-WFJ-AEP) 2023 U.S. Dist. LEXIS 171158, at *18.)

1 On November 7, 2017, Adams testified in her divorce trial that she did not know
2 when she expected to be able to complete her PhD, as she had to “rewrite the entirety of my
3 thesis.” (¶ 3, Ex. 60 at pp. 126:3–9, 130:19–23.) And she told the court point-blank she had
4 not completed her PhD (Ex. 60 at pp. 129:28–130:3):

5 THE COURT: Ma’am, you’re seeking to complete your Ph.D.
6 and you’re finishing up your thesis; correct?

7 [ADAMS]: Yes.

8 Judicial estoppel bars Adams from contradicting her prior testimony. The doctrine
9 prevents litigants from playing “fast and loose” with the courts by asserting inconsistent
10 positions. (*Thomas v. Gordon* (2000) 85 Cal.App.4th 113, 119; *People v. Castillo* (2010) 49
11 Cal.4th 145, 155 [identifying elements of judicial estoppel].) Here, Adams has taken
12 inconsistent positions in judicial proceedings, asserting both that she did not and did have
13 a PhD in November 2017. She was successful in her prior position, as the Alameda court
14 concluded she was entitled to spousal support because her “work prospects” were “limited”
15 until she completed her PhD. (¶ 4, Ex. 61 at pp. 045–047 [pp. 3–5 of Statement of
16 Decision].) Adams cannot now abandon that position even if it *were* true.

17 Between Adams’s night-and-day testimony and the facial anomalies on her claimed
18 diploma, the Court cannot credit the evidence she offers.

19 **iii. Whether Adams engaged in domestic violence in 2020 is**
20 **irrelevant to the 2017 finding that she did.**

21 That Adams was cleared of domestic violence in a later incident does not erase the
22 trial court’s findings years earlier about a separate incident. Adams points to an August
23 2020 transcript to argue any assertion that she engaged in domestic violence is false. (Opp.
24 at p. 8, Adams Decl. Ex. D.) But the August 4, 2020, transcript is from a hearing on a
25 domestic violence petition filed in 2020. (¶ 13, Ex. 70 [docket in restraining order hearing
26 related to divorce action].) It addresses a *separate* incident *years after* the Alameda court
27 ruled—following trial in November 2017—that Adams was the “primary aggressor” in
28 “disturbing” incidents of domestic violence. (¶ 4, Ex. 61 at p. 051 [Statement of Decision
p. 9].) That included Adams’s use of a circular saw to cut through a door to reach her
barricaded ex-husband. (Req. for Judicial Notice Ex. A at pp. 13, 17 [opinion pp. 4, 8].)

1 Adams does not contest that collateral estoppel bars her from arguing otherwise,
2 conceding the issue Gulley raised. (Mot. at p. 12, n. 6.) Since she cannot establish falsity as
3 a matter of law, she cannot show that assertions of domestic violence are defamatory.

4 **iv. Adams makes no attempt to establish actual malice.**

5 Adams concedes her “professional involvement in high-profile criminal cases” and
6 her work consists of public “commentary” online, but insists she is a purely “private
7 professional” and her credentials are a matter of her “personal life.” (Opp. at p. 6.) Not so.
8 As a “matter of law,” Adams’s conceded attempts to “thrust [her]self into the public eye”
9 render her a “limited purpose public figure” who must demonstrate that statements about
10 her “credentials” (and her domestic violence)⁸ are not only false but made with knowledge
11 of their falsity. (*Copp, supra*, 45 Cal.App.4th at pp. 845–846.)

12 Yet, without evidence, Adams claims Gulley “knowingly” made false accusations.
13 (Opp. at p. 10.) Her conclusory assertion thus falls far short of her burden to show a
14 probability she will be able to demonstrate—with clear and convincing evidence—that
15 Gulley made statements that Gulley subjectively believed were false. (*St. Amant v.*
16 *Thompson* (1968) 390 U.S. 727, 731.) As a result, Adams cannot show Gulley’s statements
17 were made with actual malice. Gulley’s speech thus remains protected.

18 **D. Adams’s claims that Gulley “hacked” into her website or violated
19 the TRO are unsupported.**

20 Adams’s extraordinary claim—never mentioned in her petition—that Gulley
21 “hacked” into her website to secretly record her meetings is baseless. (Opp. at p. 4.) The
22 only evidence she offers is a screenshot of a YouTube video Adams made publicly available⁹
23 and an email from “Jess Harrison.” (Ex. F.) But Gulley is not “Jess Harrison.” (Gulley
24 Suppl. Decl. ¶¶ 5(h).) And Adams has no expectation of privacy in information she willingly
25 posted to social media sites like YouTube, where the “potential audience [is] vast.”
26 (*Moreno v. Hanford Sentinel, Inc.* (2009) 172 Cal.App.4th 1125, 1130–1131.) Likewise, her

27 _____
28 ⁸ Adams concedes that whether she engaged in domestic violence bears upon her “professional credibility.”
(Opp. at p. 8.) As a result, she must show statements on this subject are false and made with actual malice.

⁹ Adams’s screenshot shows that the video is—in contrast to a *private* video available only to invited YouTube
users—accessible to anyone with a link, as depicted by the icon adjacent to the words “16h ago.” See generally
YouTube Help, <https://support.google.com/youtube/answer/157177>.

1 assertion that Gulley violated the TRO, supported only by screenshots of tweets by “Jess
2 Rose,” is baseless. Gulley is also not “Jess Rose.” (Gulley Suppl. Decl. ¶ 5(h).)

3 **E. Adams cannot hold Gulley liable for other users’ online speech,
4 nor compel Gulley—a Reddit moderator—to censor others.**

5 Adams’s opposition is laden with attempts to hold Gulley liable for speech by
6 “associates,” and her exhibits teem with comments by users who are not Gulley. (*E.g.*, Opp.
7 at p. 4; Gulley Suppl. Decl. ¶ 5). Adams ignores Gulley’s authority holding that the
8 Communications Decency Act precludes her from holding Gulley accountable for *others’*
9 speech. (Mot. at p. 13, citing 47 U.S.C. § 230, subd. (c)(1); *Banaian v. Bascom* (2022) 175
10 N.H. 151, 155–158.) Adams mentions the Act in a heading but does not otherwise respond.
11 (Opp. at p. 10.) With no argument or contrary authority, she concedes the issue.

12 **III. Adams’s Requested Relief Is a Prior Restraint Not Permitted by the First
13 Amendment or the Civil Harassment Statute.**

14 The relief Adams seeks—a broad injunction against speech *about* her—is relief the
15 Court cannot provide. As Gulley’s motion observed, the Court of Appeal has repeatedly
16 overturned injunctions far narrower than that sought by Adams. (Mot. at p. 8, citing *Evans*
17 *v. Evans* (2008) 162 Cal.App.4th 1157, 1167–1169; *Smith v. Silvey* (1983) 149 Cal.App.3d
18 400, 406–407; and *Thomas, supra*, 126 Cal.App.4th at pp. 643, 663.) Adams ignores that
19 authority, instead again to *defamation* actions—but the authority she invokes fixated on
20 procedural protections unavailable in summary civil harassment proceedings, such as a
21 “full jury trial.” (*Balboa Island Vill. Inn, Inc. v. Lemen* (2007) 40 Cal.4th 1141, 1155,
22 quoting, with approval, *Advanced Training Sys. v. Caswell Equip. Co.* (Minn. 1984) 352
23 N.W.2d 1, 11.) Adams cites no authority for the proposition that *Balboa*, a case concerning
24 defamation actions, overrode civil harassment cases like the later-decided *Evans*.

25 **CONCLUSION**

26 Respondent respectfully requests this Court grant her special motion to strike.

27 DATED: September 26, 2024

FOUNDATION FOR INDIVIDUAL
RIGHTS & EXPRESSION

28 By: 
Adam Steinbaugh
Attorney for Respondent Amy Gulley

INDEX OF EXHIBITS

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60	Excerpts of the Reporter’s Transcript on Appeal, Volume 1, from the Final Judgment of the Superior Court of the State of California in and for the County of Alameda on November 6, 7, 8, and 13, 2017, in <i>Billings v. Adams</i> , No. A162112 in the Court of Appeal and No. HF16830225 in the Superior Court for the County of Alameda	18–32
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1 **SUPPLEMENTAL DECLARATION OF AMY GULLEY**

2 I, Amy Gulley, hereby declare:

3 1. I am over the age of eighteen and the named Respondent in this action. My
4 knowledge of the information and events described here derives from my personal
5 knowledge, unless otherwise stated. If called as a witness, I could and would testify
6 competently thereto.

7 2. I respectfully submit this Supplemental Declaration in further support of my
8 SPECIAL MOTION TO STRIKE [CCP § 425.16] (the “Anti-SLAPP Motion”).

9 3. I did not send the August 23, 2023, email from Helena Spinelli that is
10 included as part of Exhibit E to Adams’s September 23, 2024, declaration in support of her
11 Opposition to the Motion to Quash, nor did I have any advance knowledge of it.

12 4. I have never proposed a business relationship with Sarrita Adams or Science
13 on Trial, Inc, or have I ever encouraged anyone else to do so.

14 5. I am not any of the following users:

- 15 a. “birdzeview.”
- 16 b. “Brian.”
- 17 c. “Deb Roberts,” “DebRoberts22249,” “@DebRoberts17282,” or
18 “@DebRoberts3.”
- 19 d. “Eleanor.”
- 20 e. “Ethelred” or “ethelred321@gmail.com.”
- 21 f. “Helena Spinelli.”
- 22 g. “@holt4321.”
- 23 h. “Jess Rose,” “Jess Harrison,” or “@Jessrose19811.”
- 24 i. “@LawHealthTech.”
- 25 j. “Paid Police Bot” or “@BotPaid68722.”
- 26 k. “PaulBeach” or “Paul Breach.”
- 27 l. “PuzzleheadedCup2574.”
- 28 m. “RevolutionaryHeat318.”
- n. “Rex v. Lucy Letby – Full Disclosure” or “@RexvsLucyLetby.”

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- o. "Richard" or "Richard Gill" or "@gill1109."
- p. "RioRiverRiviere."
- q. "Ruth39484957."
- r. "SadShoulder641."
- s. "Sally Hart."
- t. "Smelly Cat" or "SmellyCat625560."
- u. "Terry Patricks" or "@TPatricks22268."
- v. "TThomRogers."
- w. "Unhappy-News7402."

6. Any video I saw of a 'Science on Trial' meeting was after it was made publicly available by Adams or 'Science on Trial' on YouTube or similar social media sites, which did not require a password or YouTube account to view.

7. I did not post the Facebook post reading "PLEASE RESEARCH SARRITA ADAMS CEO OF SCIENCE ON TRIAL ON GOOGLE, FACEBOOK, REDDIT & LINKEDIN," which is included as part of Exhibit G to Adams's Opposition to the Special Motion to Strike.

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

Executed this 26th day of September, 2024, in Harleysville, Pennsylvania.



Amy Gulley

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 in
7 this declaration and could competently testify thereto.

8 2. I make this supplemental declaration in further support of Respondent
9 Gulley’s special motion to strike under Code of Civil Procedure section 425.16.

10 3. A true and correct copy of excerpts of the Reporter’s Transcript on Appeal,
11 Volume 1, from the Final Judgment of the Superior Court of the State of California in and
12 for the County of Alameda on November 6, 7, 8, and 13, 2017, in *Billings v. Adams*, No.
13 A162112 in the Court of Appeal and No. HF16830225 in the Superior Court for the County
14 of Alameda, is attached as **Exhibit 60**.

15 4. A true and correct copy of the March 6, 2018, Notice of Entry of Judgment,
16 together with the Judgment of the same date, in *Billings v. Adams*, No. HF16830225 in the
17 Alameda County Superior Court, is attached as **Exhibit 61**.

18 5. A true and correct copy of the “Declaration of Sarrita Anastasia Adams” filed
19 in the instant litigation on September 23, 2024, is attached as **Exhibit 62**.

20 6. A true and correct copy of the document purporting to be a diploma from the
21 University of Cambridge’s Gonville & Caius College, as submitted as part of Exhibit E to the
22 September 23, 2024, Declaration of Sarrita Anastasia Adams, is attached as **Exhibit 63**.

23 7. A true and correct copy of a screenshot of the University of Cambridge Gonville
24 & Caius College home page, available at <https://www.cai.cam.ac.uk> and archived at
25 <https://perma.cc/4PAG-ULBT>, is attached as **Exhibit 64**.

26 8. A true and correct copy of an article published by the University of Cambridge,
27 entitled “Dr Jonathan Nicholls to retire as Registry of the University,” available at
28 <https://www.staff.admin.cam.ac.uk/general-news/dr-jonathan-nicholls-to-retire-as->

1 [registrary-of-the-university](#) and archived at <https://perma.cc/KMC2-QEBT>, is attached as
2 **Exhibit 65**. The article states, in pertinent part:

3 Dr Jonathan Nicholls, the University's Registry, has
4 decided to retire on 31 December 2016.

5 9. A true and correct copy of a staff biography posted by the University of
6 Cambridge, entitled “The Registry - Ms Emma Rampton,” available at
7 [https://www.governance.cam.ac.uk/committee-members/members/Pages/Emma-](https://www.governance.cam.ac.uk/committee-members/members/Pages/Emma-Rampton.aspx)
8 [Rampton.aspx](https://www.governance.cam.ac.uk/committee-members/members/Pages/Emma-Rampton.aspx), and archived at <https://perma.cc/A5LY-MPEV>, is attached as **Exhibit 66**.

9 The biography states, in pertinent part:

10 Emma Rampton joined Cambridge in 2015 as
11 Academic Secretary. After serving as Acting Registry
12 from January 2017 (following the retirement of
Jonathan Nicholls) she was appointed Registry from
1 October 2017.

13 10. A true and correct copy of a photograph posted by “Chia Jeng Yang” and
14 purporting to show a July 1, 2017, University of Cambridge degree certificate, together with
15 the article containing the post (which is available at [https://www.quora.com/What-does-](https://www.quora.com/What-does-an-official-certificate-from-Oxford-or-Cambridge-look-like)
16 [an-official-certificate-from-Oxford-or-Cambridge-look-like](https://www.quora.com/What-does-an-official-certificate-from-Oxford-or-Cambridge-look-like) and archived at
17 <https://perma.cc/S9NC-59LU>), is attached as **Exhibit 67**.

18 11. True and correct copies of photographs posted by the Gonville & Caius
19 College, Cambridge Facebook page, which is located at [https://www.facebook.com](https://www.facebook.com/gonvilleandcaius)
20 [/gonvilleandcaius](https://www.facebook.com/gonvilleandcaius), are collectively attached as **Exhibit 68**. The individual photographs are
21 available and archived at:

- 22 a. <https://www.facebook.com/photo/?fbid=1474631669265404>
23 [\[https://archive.is/wC9Zb\]](https://archive.is/wC9Zb)
24 b. <https://www.facebook.com/photo/?fbid=1474614429267128>
25 [\[https://archive.is/rebJK\]](https://archive.is/rebJK);
26 c. <https://www.facebook.com/photo/?fbid=1474613349267236>
27 [\[https://archive.is/t9910\]](https://archive.is/t9910)
28 d. <https://www.facebook.com/photo/?fbid=1474634982598406> [3]

1 e. <https://www.facebook.com/photo/?fbid=1474633505931887>
2 [<https://archive.is/4Wg1x>]

3 f. <https://www.facebook.com/photo/?fbid=1474636239264947>
4 [<https://archive.is/LHotY>]

5 12. A true and correct copy of the webpage entitled “Degree certificates and
6 transcripts,” available at [https://www.cambridgestudents.cam.ac.uk/your-](https://www.cambridgestudents.cam.ac.uk/your-course/graduation-and-what-next/degree-certificates-and-transcripts)
7 [course/graduation-and-what-next/degree-certificates-and-transcripts](https://www.cambridgestudents.cam.ac.uk/your-course/graduation-and-what-next/degree-certificates-and-transcripts) and archived at
8 <https://perma.cc/UC7J-2YC4>, is attached as **Exhibit 69**.

9 13. A true and correct copy of the docket of *Adams vs. Billings*, Case No.
10 HF20059579 in the Alameda County Superior Court, is attached as **Exhibit 70**.

11
12 I declare under penalty of perjury under the laws of the State of California that the
13 foregoing is true and correct.

14 Executed this 26th day of September, 2024, in Philadelphia, Pennsylvania.

15
16
17 
18 Adam Steinbaugh

EXHIBIT 60

DISTRICT COURT OF APPEAL
FIRST APPELLATE DISTRICT

ORIGINAL

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Court of Appeal, First Appellate District
FILED
MAR 21 2022
Charles D. Johnson, Clerk
by _____ Deputy Clerk

JOHN N. BILLINGS,
Petitioner
& Respondent,
vs.
SARRITA A. ADAMS,
Respondent
& Appellant.

No. A162112
Alameda Co. No. HF16830225

A162212

REPORTER'S TRANSCRIPT ON APPEAL

VOLUME I
PAGES 1 - 304

FROM THE FINAL JUDGMENT OF THE SUPERIOR COURT
OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF ALAMEDA

HONORABLE THOMAS J. NIXON

MONDAY, NOVEMBER 6, 2017
TUESDAY, NOVEMBER 7, 2017
THURSDAY, NOVEMBER 8, 2017
MONDAY, NOVEMBER 13, 2017

SCANNED

A P P E A R A N C E S

For the Petitioner/Respondent: NO APPEARANCE
For the Respondent/Appellant: IN PROPRIA PERSONA

MICHELLE D. STEWARD, CSR 5954

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IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF ALAMEDA
BEFORE THE HONORABLE THOMAS J. NIXON, JUDGE
DEPARTMENT NO. 503

--oOo--

JOHN N. BILLINGS,
Petitioner,

vs. No. HF16830225

SARRITA A. ADAMS,
Respondent.

REPORTER'S TRANSCRIPT OF PROCEEDINGS

PAGES 1 - 304

HAYWARD HALL OF JUSTICE

HAYWARD, CALIFORNIA

MONDAY, NOVEMBER 6, 2017
TUESDAY, NOVEMBER 7, 2017
WEDNESDAY, NOVEMBER 8, 2017
MONDAY, NOVEMBER 13, 2017

--oOo--

A P P E A R A N C E S

For the Petitioner: STACEY POOLE,
Attorney at Law

For the Respondent: AMANDA J. LIST,
Attorney at Law

MICHELLE D. STEWARD, CSR 5954

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1 TUESDAY, NOVEMBER 7, 2017

DEPARTMENT NO. 503

2 PROCEEDINGS

3 --o0o--

4 THE COURT: Good morning, everyone.

5 MS. POOLE: Good morning, Your Honor.

6 THE COURT: We're back on the record on the
7 Billings/Adams matter. Mr. Billings was on the stand and
8 under cross-examination when we broke; correct?

9 MS. LIST: Correct.

10 THE COURT: Mr. Billings, if you'll retake the
11 stand. You'll be re-sworn, so as soon as you get situated,
12 raise your right hand.

13 THE CLERK: Raise your right hand, please.

14 JOHN BILLINGS,

15 called as a witness on behalf of the
16 Petitioner, having been first duly sworn,
17 was examined and testified as follows:

18 THE WITNESS: I do.

19 THE CLERK: Thank you. Have a seat. And if you
20 could restate your name for the record, please.

21 THE WITNESS: John Billings.

22 THE CLERK: Thank you.

23 MS. LIST: Your Honor, the last time we were here,
24 there was some confusion as to whether Mr. Billings was
25 stipulating to the fact that he had not paid bonus support
26 on the tranches that vested from his 2016 grant of RSUs.

27 MS. POOLE: We'll stipulate.

28 THE COURT: So the stipulation is that it was not

1 other than physically, perhaps like with a psychological
2 hold?

3 A. I believe I may have talked about a psychological
4 hold.

5 Q. How many times of those less than ten
6 hospitalizations that you recall were from -- resulted from
7 telephone calls you made?

8 A. There was one situation where her psychiatrist urged
9 me to call the Alameda Services, and on his advice I called
10 them. And on another occasion, Sarrita brought a can of gas
11 into the house, and I was worried and I called them. So
12 that was two occasions.

13 Q. And those are the only occasions you --

14 A. From memory, yes.

15 MS. LIST: I have nothing more at this time.

16 THE COURT: Any redirect?

17 MS. POOLE: No, Your Honor.

18 THE COURT: You may step down. Actually, do me a
19 favor, leave all those exhibits there.

20 THE WITNESS: This is a copy of KK.

21 THE COURT: Right.

22 (Witness excused)

23 THE COURT: Next witness.

24 MS. POOLE: Call Ms. Adams, Your Honor.

25 THE COURT: Ms. Adams.

26 THE CLERK: If you can raise your right hand for me,
27 please.

28 // // //

1 SARRITA ADAMS,
2 called as a witness on behalf of the
3 Petitioner, having been first duly sworn,
4 was examined and testified as follows:

5 THE WITNESS: I do, yes.

6 THE CLERK: Thank you. You can have a seat. And if
7 you could state your name, please.

8 THE WITNESS: My name is Sarrita Adams.

9 THE CLERK: Thank you.

10 DIRECT EXAMINATION OF SARRITA ADAMS (776)

11 BY MS. POOLE:

12 Q. Good morning, Ms. Adams.

13 A. Hello.

14 Q. Are you currently aware of any agency that's
15 investigating Mr. Billings for his conduct toward you?

16 A. Yes, I am.

17 Q. What agency is that?

18 A. It's Alameda Social Services.

19 Q. And how are you aware that they're investigating
20 him?

21 A. My psychiatrist was very concerned last year because
22 Mr. Billings's therapist had contacted him providing
23 information that seemed that either Mr. Billings was
24 suffering from mental distress of some kind, and he was
25 concerned about my welfare, since Mr. Billings had left the
26 house and was refusing to communicate with me but was
27 seemingly communicating with people associated with me.

28 Q. And are you aware if this is still an open

1 investigation?

2 A. I believe it is.

3 Q. And do you have any expectation of what will happen
4 with this investigations?

5 A. I believe that they're looking at it under the
6 Welfare and Institutions Act, because I have autism, which
7 is a developmental disorder which makes me a dependent
8 adult.

9 Q. At some point during your marriage were you employed
10 at a lab at UC Davis?

11 A. No, I wasn't technically employed there.

12 Q. What was your title?

13 A. I was research scholar and Ph.D. student.

14 Q. And how long were you a research scholar there?

15 A. As per my J1 visa, I was a research scholar for the
16 entirety of my Ph.D., for the entirety of the time I was
17 doing my Ph.D., so it had to go on my visa category, and so
18 it would have been three years.

19 Q. That ended when?

20 A. 2013.

21 Q. And what type of work were you doing?

22 A. Just to note that I wasn't paid for the entirety of
23 this three years. I wasn't doing any work for the lab. I
24 was doing my Ph.D. research.

25 Q. When did you stop working or stop --

26 A. Well, I technically didn't stop doing my research
27 until -- I'm currently still doing it, because I'm still
28 trying to rewrite my thesis. It's an ongoing process.

1 Q. When did you stop receiving income from UC Davis?

2 A. In September 2013.

3 Q. What type of work were you doing in the lab?

4 A. I was doing my Ph.D. research.

5 Q. Which included -- can you tell us more about that
6 process?

7 A. It was what we would define as wet lab research, and
8 that involves work with cells, living cells, and mouse
9 models of human disease.

10 Q. Do you believe that you're currently capable of
11 continuing that type of work?

12 A. I believe that, with a lot of assistance, I would be
13 able to do some work.

14 Q. What has changed since September 2013 till now that
15 would prevent you from -- that would require additional
16 assistance for you to get that type of work?

17 A. I no longer have a spouse.

18 Q. So it's your position that, because you're getting a
19 divorce, you're unable to continue your work?

20 A. John was an incredible support in regard to my
21 autism: He helped me with my medication; he helped me with
22 executive function; he helped me with organization; he
23 helped me with a host of things. And prior to meeting John,
24 I had treatment I received in the UK that provided for these
25 things.

26 Q. How much were you earning?

27 A. I sorry?

28 Q. How much were you earning?

1 A. I believe that I was earning minimum to qualify for
2 J1 visa, which would have been \$24,000 a year.

3 Q. And what work do you have to do to complete your
4 Ph.D. dissertation?

5 A. I received major corrections, and I was told to
6 rewrite the entirety of my thesis; to conduct new analysis,
7 data analysis, from gene data that I received; and
8 restructure the thesis, as well as rewrite all of the
9 chapters.

10 Q. When did you receive those corrections?

11 A. In February 2015.

12 Q. And while you were married, did you or John employ a
13 tutor or someone to help you in rewriting that?

14 A. I had assistance in March 2016 for a few weeks, but
15 it was disrupted because John decided to leave. And then he
16 filed for divorce on April 13th, served me with a summons on
17 my birthday.

18 Q. That petition was later dismissed; correct?

19 A. Yes, but it disrupted me incredibly. With autism, I
20 require a lot of consistency.

21 Q. And since that filing in, I'm sorry, March or
22 April --

23 A. It was April 13th, on my birthday.

24 Q. Since that filing in April, what work have you done
25 to complete your dissertation?

26 A. I've been doing some data analysis. I have reached
27 out to two labs to ask whether they would be able to host me
28 to complete some wet lab work, but it required that I

1 receive my green card so that I could -- sorry -- so I could
2 apply for U.S. funds, because you can't do it if you're not
3 a resident.

4 Q. Which of the two labs have you applied to?

5 A. One was at Stanford and one was at UCSF.

6 Q. Do you now have your green card?

7 A. I received my green card on October the 10th, I
8 believe, 2017.

9 Q. And what jobs have you applied for since you
10 received your green card?

11 A. I have not applied for any since that time.

12 Q. What type of jobs do you plan to apply for?

13 A. Well, I am currently receiving in-home care
14 treatment from the Center for Autism and Related Disorders,
15 and they are assisting me with vocational support. It's
16 felt that I'm not ready to be in the workplace yet, until I
17 receive further training.

18 Q. When do you expect to be ready to be in the work
19 force?

20 A. I don't know, as I've only started working with
21 them. I also received a report from UCSF in March 2017,
22 stating the same thing, that I would require extreme
23 supports in the workplace and vocational training.

24 Q. And what type of vocational training did you do as a
25 result of that report?

26 A. I have not done any, because funding was not
27 available.

28 Q. And who's providing the funding?

1 A. Well, nobody, because it's not available.

2 Q. Is that something you're expected to pay for?

3 A. Yes, out of pocket.

4 Q. And how much is it?

5 A. Well, it starts at \$560 per session. One session is
6 an hour long. I would probably be expected to complete in
7 excess of about 30 hours.

8 Q. When you do obtain employment, how much do you
9 expect to earn?

10 A. Starting salary for postdoc is currently \$37,000 a
11 year, although I should note that in many cases people are,
12 for the benefit of the visa, volunteering to do a postdoc
13 free of charge. So it's incredibly competitive.

14 Q. What other type of work do you believe you could do
15 other than lab work?

16 A. None I can think of.

17 Q. Have you applied for any other types of jobs?

18 A. Yes, I did. I applied for an apprenticeship at
19 cabinetry firm in Oakland that makes cabinets.

20 Q. And when was that?

21 A. In March. I applied for another firm that makes
22 mobile office spaces in San Francisco; that was in March. I
23 applied to work at Oakland Animal Services; that was also in
24 March. And I applied to do some scientific writing at Plus,
25 which is a journal in San Francisco, in February, and I
26 applied again in June, and I applied again September. I
27 applied for another scientific writing position with a
28 publication that wasn't disclosed when I applied; I didn't

1 hear back. I applied for quite a few jobs and I simply
2 don't hear back.

3 Q. And how much do each of those jobs that you applied
4 for pay?

5 A. They range anywhere from, you know, a postdoc salary
6 starting at \$37,000 to about -- the others really didn't
7 say, you know, the actual pay. It said it was negotiable.

8 I also applied for some internships. And I had met
9 with people and they determined they would not be able to
10 make the accommodations I require. That's been a common
11 response that I've got when I've had interviews.

12 Q. So who have you had interviews with?

13 A. When I went to Oakland Animal Services, they said
14 that I would probably be a good volunteer, and I'm currently
15 a volunteer at Oakland Animal Services, but that they were
16 not able to make the accommodations for me in relation to my
17 sensitivities and my restricted behaviors.

18 The cabinetmaker also was concerned because I have
19 dyspraxia, which is a motor issue. He was concerned that I
20 would cause injury to myself.

21 Q. You indicated in your declaration, that you signed
22 on February 9th, 2017, that you were currently then working
23 with a psychiatrist three times a week --

24 A. Correct.

25 Q. -- to overcome barriers so you may become
26 employable. Are you still working with that psychiatrist?

27 A. I was unable to afford to continue working with him.

28 THE COURT: Counsel, can I interrupt.

1 Ma'am, you're seeking to complete your Ph.D. and
2 you're finishing up your thesis; correct?

3 THE RESPONDENT: Yes.

4 THE COURT: Assuming that you're able to complete
5 the work necessary to get the Ph.D., would you be able to
6 teach?

7 THE WITNESS: No. The process for teaching is
8 incredibly complicated in the scientific academia, so you
9 would technically be first required to hold your own lab,
10 and then, within your lab, then you teach that way. So you
11 normally --

12 THE COURT: Even junior college you would need to do
13 all that?

14 THE RESPONDENT: I haven't looked into junior
15 college. But I have quite a lot of social phobia. So it
16 would probably be quite difficult. Also with the noise of
17 the students would be a challenge.

18 THE COURT: Okay. Thank you.

19 MS. POOLE: Q. When do you expect to complete your
20 Ph.D.?

21 A. I don't know. As soon as I can.

22 Q. Within the next two months?

23 A. As soon as I can.

24 Q. At this point, what's preventing you from completing
25 your Ph.D.?

26 A. The stress of this divorce process and the period
27 prior to the divorce. Emotional abuse from my husband
28 didn't really help.

1 Q. When do you expect to become employed after you
2 complete your Ph.D.?

3 A. As soon as I can.

4 Q. In December 16th you received \$30,257?

5 A. Correct.

6 Q. And that was from an RSU vest?

7 A. They were community RSUs, I believe.

8 Q. And that was -- actually, some of those were not
9 community shares; is that correct?

10 A. I was informed at the time they were community.

11 Q. Isn't there a stipulation that says the character is
12 yet to be determined?

13 A. Yes, but it was assumed. It was told to me that
14 they were community.

15 Q. And in January 2017 you filed an ex parte motion;
16 correct?

17 A. Yes, because you were refusing to give me access to
18 my community RSUs.

19 Q. What community RSUs would have been available in
20 January 2017?

21 A. The ex parte motion was for the upcoming ones on
22 February 20th, 2017. We were trying to get access. And
23 those were repeated back and forward between my
24 then-attorney, Carrie Schneider, and opposing counsel, in
25 which opposing counsel continued to shift the goal posts, in
26 terms of how much money I could get access to, and then
27 eventually said I could not have access to any of the money.

28 Q. And in February you received approximately 20,000

1 COUNTY OF ALAMEDA)
2 STATE OF CALIFORNIA) ss.

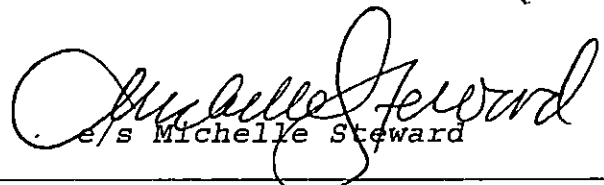
3 I, MICHELLE D. STEWARD, do hereby certify:

4 That I am a Certified Shorthand Reporter in the
5 state of California, License No. 5954, and retired official
6 reporter in the Superior Court, in and for the County of
7 Alameda;

8 That on 11-06-17; 11-07-17; 11-08-17 and 11-13-17,
9 I fully and correctly reported the within-entitled matter,
10 John Billings v. Sarrita Adams, before the Honorable Thomas
11 J. Nixon, Judge;

12 That the foregoing pages, 8 through 303,
13 inclusive, are a full, true and correct transcription of my
14 stenographic notes, achieved by means of computer-aided
15 transcription, taken at the aforementioned time and place.

16 IN WITNESS WHEREOF, I have hereunto subscribed my
17 name this 27th day of November, 2017.

18
19 
20 e/s Michelle Steward

21 MICHELLE D. STEWARD, CSR 5954
22
23
24
25
26
27
28

EXHIBIT 61

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State, number, and address): Stacey Poole 202964 Lerner-Poole, LLP 535 Pacific Avenue, 2nd Floor San Francisco, CA 94133 TELEPHONE NO.: (415) 391-6000 FAX NO. (Optional): (415) 391-6011 E-MAIL ADDRESS (Optional): stacey@cafamilylaw.com ATTORNEY FOR (Name): JOHN NICHOLAS BILLINGS	FOR COURT USE ONLY ENDORSED FILED ALAMEDA COUNTY MAR 06 2018 CLERK OF THE SUPERIOR COURT By <u>PAMI YOUNG</u> Deputy
SUPERIOR COURT OF CALIFORNIA, COUNTY OF ALAMEDA STREET ADDRESS: 24405 Amador Street MAILING ADDRESS: 24405 Amador Street CITY AND ZIP CODE: Hayward, CA 94544-1314 BRANCH NAME SOUTHERN DIVISION	
PETITIONER: JOHN NICHOLAS BILLINGS RESPONDENT: SARRITA ANASTASIA ADAMS	
NOTICE OF ENTRY OF JUDGMENT	CASE NUMBER: HF16830225

You are notified that the following judgment was entered on (date): 3/25/18

1. Dissolution
2. Dissolution - status only
3. Dissolution - reserving jurisdiction over termination of marital status or domestic partnership
4. Legal separation
5. Nullity
6. Parent-child relationship
7. Judgment on reserved issues
8. Other (specify):

Date: **MAR 06 2018**

Clerk, by **PAMELA A. YOUNG**, Deputy

-NOTICE TO ATTORNEY OF RECORD OR PARTY WITHOUT ATTORNEY-

Under the provisions of Code of Civil Procedure section 1952, if no appeal is filed the court may order the exhibits destroyed or otherwise disposed of after 60 days from the expiration of the appeal time.

STATEMENT IN THIS BOX APPLIES ONLY TO JUDGMENT OF DISSOLUTION Effective date of termination of marital or domestic partnership status (specify): <u>12/31/2017</u> WARNING: Neither party may remarry or enter into a new domestic partnership until the effective date of the termination of marital or domestic partnership status, as shown in this box.

CLERK'S CERTIFICATE OF MAILING

I certify that I am not a party to this cause and that a true copy of the *Notice of Entry of Judgment* was mailed first class, postage fully prepaid, in a sealed envelope addressed as shown below, and that the notice was mailed

at (place): Hayward, California, on (date):

Date: **MAR 06 2018**

Clerk, by **PAMELA A. YOUNG**, Deputy

Name and address of petitioner or petitioner's attorney
JOHN NICHOLAS BILLINGS
c/o Stacey Poole
Lerner Poole, LLP
535 Pacific Avenue, 2nd Floor
San Francisco, CA 94133

Name and address of respondent or respondent's attorney
SARRITA ANASTASIA ADAMS
c/o Robert Sullivan
Kaspar & Lugay, LLP
1606 Juanita Lane, Ste. B
Tiburon, CA 94920

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): — Stacey Poole 202964 Lerner-Poole, LLP 535 Pacific Avenue, 2nd Floor San Francisco, CA 94133 TELEPHONE NO.: (415) 391-6000 FAX NO. (Optional): (415) 391-6011 E-MAIL ADDRESS (Optional): stacey@cafamilylaw.com ATTORNEY FOR (Name): JOHN NICHOLAS BILLINGS	FOR COURT USE ONLY ENDORSED FILED AT ALAMEDA COUNTY MAR 06 2018 CLERK OF THE SUPERIOR COURT By <u>PAM YOUNG</u> Deputy
SUPERIOR COURT OF CALIFORNIA, COUNTY OF ALAMEDA STREET ADDRESS: 24405 Amador Street MAILING ADDRESS: 24405 Amador Street CITY AND ZIP CODE: Hayward, CA 94544-1314 BRANCH NAME: SOUTHERN DIVISION	
MARRIAGE OR PARTNERSHIP OF PETITIONER: JOHN NICHOLAS BILLINGS RESPONDENT: SARRITA ANASTASIA ADAMS	
JUDGMENT <input checked="" type="checkbox"/> DISSOLUTION <input type="checkbox"/> LEGAL SEPARATION <input type="checkbox"/> NULLITY <input type="checkbox"/> Status only <input type="checkbox"/> Reserving jurisdiction over termination of marital or domestic partnership status <input type="checkbox"/> Judgment on reserved issues Date marital or domestic partnership status ends: 12/31/2017	CASE NUMBER: HF16830225

1. This judgment contains personal conduct restraining orders modifies existing restraining orders.
 The restraining orders are contained on page(s) _____ of the attachment. They expire on (date): _____
2. This proceeding was heard as follows: Default or uncontested By declaration under Family Code section 2336
 Contested Agreement in court
 a. Date: November 6-8, 13, 2017 Dept.: 503 Room: _____
 b. Judicial officer (name): Thomas J. Nixon Temporary judge
 c. Petitioner present in court Attorney present in court (name): Stacey Poole
 d. Respondent present in court Attorney present in court (name): Amanda List
 e. Claimant present in court (name): _____ Attorney present in court (name): _____
 f. Other (specify name): _____
3. The court acquired jurisdiction of the respondent on (date): 9/21/2016
 a. The respondent was served with process.
 b. The respondent appeared.

THE COURT ORDERS, GOOD CAUSE APPEARING

4. a. Judgment of dissolution is entered. Marital or domestic partnership status is terminated and the parties are restored to the status of single persons
 (1) on (specify date): 12/31/2017
 (2) on a date to be determined on noticed motion of either party or on stipulation.
 b. Judgment of legal separation is entered.
 c. Judgment of nullity is entered. The parties are declared to be single persons on the ground of (specify): _____

 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.

CASE NAME (Last name, first name of each party): Marriage of Billings and Adams	CASE NUMBER: HF16830225
--	----------------------------

4. i. The children of this marriage or domestic partnership are:
- (1) Name Birthdate
- (2) Parentage is established for children of this relationship born prior to the marriage or domestic partnership
- j. Child custody and visitation (parenting time) are ordered as set forth in the attached
- (1) Settlement agreement, stipulation for judgment, or other written agreement which contains the information required by Family Code section 3048(a).
- (2) *Child Custody and Visitation Order Attachment* (form FL-341).
- (3) *Stipulation and Order for Custody and/or Visitation of Children* (form FL-355).
- (4) Previously established in another case. Case number: Court:
- k. Child support is ordered as set forth in the attached
- (1) Settlement agreement, stipulation for judgment, or other written agreement which contains the declarations required by Family Code section 4065(a).
- (2) *Child Support Information and Order Attachment* (form FL-342).
- (3) *Stipulation to Establish or Modify Child Support and Order* (form FL-350).
- (4) Previously established in another case. Case number: Court:
- l. Spousal, domestic partner, or family support is ordered:
- (1) Reserved for future determination as relates to petitioner respondent
- (2) Jurisdiction terminated to order spousal or partner support to petitioner respondent
- (3) As set forth in the attached *Spousal, Partner, or Family Support Order Attachment* (form FL-343).
- (4) As set forth in the attached settlement agreement, stipulation for judgment, or other written agreement.
- (5) Other (specify): As set forth in the attachment.
- m. Property division is ordered as set forth in the attached
- (1) Settlement agreement, stipulation for judgment, or other written agreement.
- (2) *Property Order Attachment to Judgment* (form FL-345).
- (3) Other (specify): See attachment.
- n. Attorney fees and costs are ordered as set forth in the attached
- (1) Settlement agreement, stipulation for judgment, or other written agreement.
- (2) *Attorney Fees and Costs Order* (form FL-346).
- (3) Other (specify): See attachment.
- o. Other (specify):

Each attachment to this judgment is incorporated into this judgment, and the parties are ordered to comply with each attachment's provisions. Jurisdiction is reserved to make other orders necessary to carry out this judgment.

THOMAS J. NIXON

Date: **MAR 06 2018**

JUDICIAL OFFICER

5. Number of pages attached: 29

SIGNATURE FOLLOWS LAST ATTACHMENT

NOTICE

Dissolution or legal separation may automatically cancel the rights of a spouse or domestic partner under the other spouse's or domestic partner's will, trust, retirement plan, power of attorney, pay-on-death bank account, transfer-on-death vehicle registration, survivorship rights to any property owned in joint tenancy, and any other similar property interest. It does not automatically cancel the rights of a spouse or domestic partner as beneficiary of the other spouse's or domestic partner's life insurance policy. You should review these matters, as well as any credit cards, other credit accounts, insurance policies, retirement plans, and credit reports, to determine whether they should be changed or whether you should take any other actions.

A debt or obligation may be assigned to one party as part of the dissolution of property and debts, but if that party does not pay the debt or obligation, the creditor may be able to collect from the other party.

An earnings assignment may be issued without additional proof if child, family, partner, or spousal support is ordered.

Any party required to pay support must pay interest on overdue amounts at the "legal rate," which is currently 10 percent.

JUDGMENT

The Court finds irreconcilable differences have arisen causing an irremediable breakdown of the marriage. The parties are restored to the status of unmarried persons effective 12-31-2017. The Court held a trial on November 6, 7, 8 and 13, 2017. The Court's Statement of Decision is attached hereto as Exhibit "A" for future reference.

Spousal Support

Beginning January 1, 2018 and continuing until December 31, 2019, Petitioner shall pay to Respondent as and for Spousal Support the sum of \$6,000 per month payable on the 1st day of each month. He shall also pay as additional support 15% of his separate RSU income. Considering the stated needs of the respondent, her share of the community RSUs, and all other funds available for her support, this award meets Respondents needs and the marital standard of living.

This award assumes that the RSUs will continue. The court reserves jurisdiction to modify this award should petitioner's employment with Yelp end for any reason or RSU income be deferred or delayed.

House

The parties are ordered to obtain a realtor no later than January 31, 2018.

ATTACHMENT TO JUDGMENT (FL-180).

If the parties cannot agree on a realtor, each party is to submit to the court the names of three potential realtors and the court will appoint one. These names should be provided to the Court no later than February 5, 2018. Courtesy copies should be provided directly to department 503.

Effective March 1, 2018 or as soon thereafter as is practicable, the house is to be listed for sale. The parties are to endeavor to have all repairs incident to the sale of the property paid out of escrow. Each party is to pay one-half of all said repairs.

Petitioner and Respondent are to cooperate fully with the realtor in the sale of the home. So long as Respondent cooperates fully, she may remain in the residence until it is sold. She must maintain the property in showable condition. She will also be responsible for all continuing payments on the mortgage, taxes, utilities, and normal monthly maintenance (lawns, etc.). Should she fail to make said payments or cooperate with the listing agent, her continuing tenancy will be ended. Should Respondent choose to vacate the property prior to sale, the parties shall share equally the ongoing expenses of the property until it is sold.

Petitioner shall receive reimbursement in the amount of \$69,476 for his separate property contribution to the down payment on the house. Respondent

ATTACHMENT TO JUDGMENT (FL-180).

is to receive reimbursement in the amount of \$6,961.

Property Division:

Yelp stock and RSUs: The parties stipulated to use the Nelson formula to allocate Petitioner's Yelp RSUs and stock options. The court adopts Ms. Bertozzi's calculations on pages BI-B4 of her report which is attached hereto as Exhibit "B".

Each Party shall be responsible for the tax consequences of the exercise of any RSUs or stock options exercised on that Party's behalf. The Parties understand that upon future exercises of options to purchase stock and the immediate sale of the restricted stock, the company will withhold some portion of the proceeds of the stock for federal and state taxes. Upon exercising on Wife's behalf, Husband shall promptly transfer to Wife the gross amount due her upon exercise of her options and her sale of her shares. Any withholding for taxes on Wife's share shall be credited to the Husband as Wife is being paid a gross amount based on the value of the units. Wife agrees to report, as income received in the appropriate year, the gross amount of the proceeds of the exercise of the options (excluding the amount withheld by the company) to the appropriate taxing authorities. The Parties shall cooperate in filing tax returns that fully explain the division, exercise, and tax consequences of the options. Respondent shall indemnify and hold Petitioner harmless for any Federal or State

ATTACHMENT TO JUDGMENT (FL-180).

taxes owed on her RSU or stock option income received post-January 1, 2018.

Bank Accounts: Petitioner shall reimburse Respondent the sum of \$235.16 for her share of the community bank accounts (Chase plus savings, Chase Premier Checking #5717, Barclay's bank #0180 and the Cooperative bank) which are confirmed to Petitioner.

Furniture and Furnishings:

The parties shall attempt to agree to a division of furniture and furnishings. The court reserves jurisdiction over this issue in the event that the parties are not able to agree on a division.

Automobile

2016 Acura MDX: If Respondent wishes to retain the vehicle she may do so, provided she pays all ongoing lease payments and insurance. She must hold Petitioner harmless from any additional costs incident to the lease. If Respondent does not want to vehicle, the Acura should be turned over the dealership. The parties are to share equally in any penalties or fees for early termination of the lease. The court reserves jurisdiction on this issue should there be damage to the vehicle, excessive mileage, or any other problems that may be attributable to only one of the parties.

Dogs

The Greyhounds: It was difficult to get a straight answer from the Respondent as to whether or not she wanted these dogs confirmed to her. The court is not inclined to award support for the dogs. The dogs are first awarded to Ms. Adams. Should Ms. Adams wish to keep the dogs, she must notify petitioner or petitioner's counsel within 30 days of March 1, 2018. Mr. Billings must then cooperate in having the dogs registered in Ms. Adams name. She will then be solely responsible for the dogs continued care and maintenance. Should, within 30 days of March 1, 2018, Ms. Adams decide not to keep the dogs under these requirements, the dogs will be awarded to Mr. Billings. He will then arrange to pick-up the dogs within two weeks of Ms. Billings' decision. He then will be responsible for the dogs moving forward.

Reimbursements

RSU Overpayment: The Court finds that, pursuant to Ms. Bertozzi's report, Ms. Adams received a greater share of RSU income than called for under the Nelson formula. From the November 2016 tranche she received \$31,433.30. She should have received \$23,763.57. From the February 2017 tranche she received \$20,521.89. She should have received \$11,713.27. Respondent owes Petitioner \$16,478.35 for said overpayment.

The court does order Respondent to reimburse Petitioner \$978 for the

ATTACHMENT TO JUDGMENT (FL-180).

insurance overpayment and \$832 for the auto accident payment all payments which the court does not consider to be for respondent's support. Ms. Adams is entitled to reimbursement from the Chase account in the amount of \$2173.53.

Credit Card Debt:

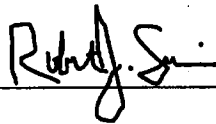
Each party is to pay one-half of all community credit card debt still in existence. Each party is responsible for those charges made to community accounts after the date of separation and still owing. Those amounts are to be paid out of escrow of the family residence and deducted from the proceeds of the person who incurred said charges. Any payments made by either party towards the separate debt of the other prior to the sale of the family home shall be reimbursed in the same manner.

Attorney's Fees:

Mr. Billings to pay an additional \$35,000 towards Ms. Adams' attorney's fees and costs in addition to the \$5,000 previously ordered. This amount may be paid out of petitioner's share of the proceeds from the Snake Road property.

Approved as to form:

Dated: March 1, 2018



Robert Sullivan

Attorney for Respondent Sarrita Adams

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF ALAMEDA**

DATE: January 25, 2018

Hon. Thomas J. Nixon, Judge

DEPT. 503 **ENDORSED**

FILED
Pam Young, Deputy Clerk
ALAMEDA COUNTY

JOHN NICHOLAS BILLINGS

JAN 25 2018

vs.

CLERK OF THE SUPERIOR COURT

By **PAM YOUNG**

SARRITA ANASTASIA ADAMS

Deputy

NATURE OF PROCEEDINGS:

ACTION NO. HF16830225

STATEMENT OF DECISION

This matter came regularly on for trial November 6, 7, 8 and 13, 2017. Petitioner was present each day of trial represented by Stacey Poole, Esq. Respondent was present each day of trial represented by Amanda List, Esq. Petitioner, Respondent and real estate appraiser Diana Yovino-Young testified at trial. After evidence both oral and documentary had been presented, counsel requested time to submit closing briefs. The Court gave counsel until December 11, 2017, to file their briefs. Thereafter on December 12, 2017, the Court took the matter under submission. Having reviewed the register of actions, transcripts from each day of trial and all documents and briefs submitted, the court issued a tentative statement of decision on December 27, 2017. Both petitioner and respondent timely filed objections to the tentative statement of decision. The court now issues its Statement of Decision. To the extent any objection is not addressed in this decision, it is deemed denied.

Status

The Court finds irreconcilable differences have arisen causing an irremediable breakdown of the marriage. The parties are restored to the status of unmarried persons effective 12-31-2017.

Stipulations:

At the beginning of trial the parties stipulated that the RSU's obtained as a consequence of petitioner's employment with Yelp would be divided pursuant to the Marriage of Nelson formula [177CA 3rd 150 (1986)].¹ The parties also stipulated that Petitioner waived any FC §2640 claims for improvements to the family home.²

Contested Issues:

1. Spousal Support
2. Division/Disposition of Family Home
3. Property Division
4. Reimbursements
5. Attorney's Fees

Facts:

Both parties are 33 years of age. The parties met in the fall of 2008 while each attended the University of Cambridge in England. According to testimony provided at the trial, the parties began cohabitating shortly after meeting. In October 2010, Petitioner and Respondent moved to the United States. They were not married. According to Respondent, Petitioner asked her to

¹ See Transcript November 6, 2017, pg. 2, lines 13 – 14.

² See Transcript November 6, 2017, pg. 2 lines 15 – 17.

accompany him to the US, but made it clear that "he would go, with me or without me".³

Upon arriving in the US, Petitioner began work at a company named "My Life". Respondent continued her Ph.D studies at UC Davis. Thereafter, Petitioner obtained employment at Yelp, Inc. The parties married July 5, 2012. In November 2012, they purchased the house at 7107 Snake Road, Oakland. The parties' relationship was at times volatile. Both parties alleged the other committed acts of Domestic Violence. Respondent was 5150'd many times. Both parties were arrested at least once. Although he moved out in July 2015, the date of separation was agreed to be August 20, 2016.

Since date of separation Respondent has remained in the family home. Petitioner resides in an apartment in San Francisco.

As a child, Respondent was diagnosed with Autism. She indicates that she also suffers from Dyspraxia, PTSD, generalized anxiety disorder and Asthma.⁴ She was placed in a residential hospital for children, adolescents with developmental disorders or psychiatric disorders at age 12 and remained there until she was 18. At 18, she moved to London and stayed in a flat near her father. Despite her challenges, she enrolled in the University of Cambridge and become a Ph.D candidate. Respondent has not yet completed all work necessary to obtain her Ph.D. Although she submitted her dissertation, it came back requiring major revisions and re-writes. She could not speculate as to how much more time she would need to complete all revisions of her dissertation as required.

³ See Transcript November 7, 2017, pg. 158 line 5

Petitioner continues to work at Yelp, Inc. As part of his compensation, he receives RSU's. His base compensation was \$195,000 at date of separation. It increased to \$205,000 in October 2016 and now sits at \$215,000 + RSU's and bonuses. The RSU's will vest only so long as petitioner continues his employment with Yelp. He testified that he's happy at Yelp and has no plans to leave.

Spousal Support:

Respondent, Ms. Adams, is requesting permanent spousal support from Mr. Billings. Currently, she receives temporary spousal support at a rate of \$7,005 per month plus a percentage of any bonus income received by Mr. Billings. This order was issued April 13, 2017 and made retroactive to February 1, 2017. Prior to the filing of her RFO, Respondent received \$5,000 from Petitioner plus a \$10,000 distribution earmarked for attorney's fees. Petitioner also paid the mortgage and taxes on the house, most utilities, and credit card debt. Petitioner is seeking reimbursement for funds expended prior to the filing of the RFO. The court will speak to that issue later in this decision.

Permanent Spousal Support is governed by Family Code § 4320. Section 4320 sets out fourteen factors the court must consider when ordering spousal support:

(a) The extent to which the earning capacity of each party is sufficient to maintain the standard of living established during the marriage, taking into account the following;

(1) The marketable skills of the supported party; the job market for those skills; the time and expenses required for the supported party to acquire the appropriate education or training to develop those skills; and the possible need for retraining or education to acquire other, more marketable skills or employment.

⁴ See Transcript November 7, 2017, pg. 155 lines 1 – 3

(2) The extent to which the supported party's present or future earning capacity is impaired by periods of unemployment that were incurred during the marriage to permit the supported party to devote time to domestic duties.

Obviously, Petitioner continues at the same employment he had prior to separation. His income has risen slightly since the date of separation. The payment of ongoing spousal support is the only known impediment to his ability to maintain the marital standard of living.

Respondent is currently unemployed. Other than a \$2,000 per month stipend which she received while at UC Davis, she has not been gainfully employed since before the marriage. She was seeking a Ph.D in molecular neurobiology but it appears that she put that study on hold. Respondent indicates that the stress of the divorce and her medical conditions prevents her from continuing her work towards completing her dissertation.

While she has a green card now, it does not appear that she has any work history to fall back on. At least, none was proffered. Unless she completes the work necessary to obtain her Ph.D, her work prospects appear somewhat limited. She certainly will not be able to maintain the marital standard of living. The Court finds that the parties subsisted on between \$300,000 and \$500,000 a year depending on the sale of RSUs. No evidence was presented to suggest that Respondent's earning capacity was impaired due to domestic duties.

(b) The extent to which the supported party contributed to the attainment of an education, training, a career position, or a license by the supporting party.

No evidence was presented suggesting Respondent contributed to the attainment of an education, training, a career position, or a license by the petitioner other than Respondent's testimony that she suggested a path Petitioner might take to obtain a raise and RSUs. The parties' testimony differ on this point, however the court does not consider such a suggestion, even if it were supported by the other evidence, to be "contributing" as envisioned by this factor.

(c) The ability of the supporting party to pay spousal support, taking into account the supporting party's earning capacity, earned and unearned income, assets and standard of living.

Petitioner has an ability to pay spousal support. His current base income is \$215,000. It was \$195,000 at time of separation. He will receive the lion share of the RSUs pursuant to the Nelson formula. As previously indicated, his average yearly income including RSU's was \$400,000 per year.

(d) The needs of each party based on the standard of living established during the marriage

As Respondent did not work for an appreciable period of time during the marriage, the parties subsisted on Petitioner's income. Now that two households must be maintained, neither party will be in quite the same position as they would have been if only one household was required. Respondent, however, even exercising those RUSs assigned to her, will not be able to reach the marital standard of living established during the marriage without support or employment.

Although not supported by any evidence other than Respondent's testimony, she believes her post doctorate earning will be no more than \$37,000

per year. Again, while this seems low, no other evidence of vocational earning capacity was provided at trial. Both parties testified to a somewhat frugal lifestyle. The parties owned one car. They took few trips. They spent little on clothes or personal items. According to Ms. Adams, the only piece of jewelry purchased by Mr. Adams for her was her wedding ring. She testified that she did not even go to the hairdressers during the marriage. All of the money went to the house. In her closing brief, respondent indicated that she felt that she would need between \$10,000 and \$12,000 per month to adequately cover her needs.

(e) The obligations and assets, including the separate property, of each party.

The obligations of the parties are not significant and all debt should be able to be extinguished after judgment. Each party will have assets from the house, stock and RSUs.

(f) The duration of the marriage

This is a marriage of 4 years and 1 month. It is, therefore, of short duration.

(g) The ability of the supported party to engage in gainful employment without unduly interfering with the interests of dependent children in the custody of the party.

The parties have no minor children.

(h) The age and health of the parties

Both parties are young (33). Both parties are physically healthy. One of the primary bones of contention in this case, however, is Respondent's belief that her diagnosed Autism prevents or severely diminishes her ability to work.

There can be no doubt that Respondent has had periods of hospitalization over the last few years. The exact reasons for those hospitalizations were not

provided. Respondent and petitioner testified that respondent was 5150'd on numerous occasions. Respondent also testified that she was 5250'd twice⁵. No medical records, expert testimony or other collaborating evidence was provided to the court to allow the court to make a factual finding that respondent was, indeed, 5250'd. Regardless, the court accepts that respondent does, indeed, suffer from autism, among other disorders, and that this has led to periods of involuntary hospitalization. The court has carefully considered respondent's medical challenges in making this order. Respondent, for her part, seemed to suggest that she believed that many of her 5150 episodes were unnecessary or brought about by lies told to physicians, psychiatrists, or to the police by Petitioner. The court was not informed of any periods of hospitalization occurring after the parties separated in August 2016. At trial, Respondent appeared lucid, intelligent and competent. A blanket statement by her that she's a "dependent adult"⁶ or that it's felt that she needs further vocational training⁷ offered without any expert assessment or testimony is insufficient for the court to conclude that she cannot complete her dissertation in a timely manner and obtain employment. While she undoubtedly has challenges that have delayed her completion of her Ph.D., the burden is on her to prove those challenges prevent her from obtaining gainful employment. She has not met that burden.

- (i) Documented evidence, including a plea of nolo contendere, of any history of domestic violence, as defined in Section 6211, between the parties or perpetrated by either party against either party's child, including, but not limited to, consideration of emotional distress**

⁵ See Transcript (November 8, 2017, pg. 226 lines 17-18.

⁶ See Transcript November 7, 2017, pg. 116 lines 7 - 8.

⁷ See Transcript (November 7, 2017, . . pg. 119 lines 15-17

resulting from domestic violence perpetrated against the supported party by the supporting party, and consideration of any history of violence against the supporting party by the supported party.

Both parties testified at length concerning the domestic violence perpetrated by the other. The Court found Petitioner's testimony more credible in this regard. Although each was arrested, no charges were ever brought. Pictures provided of Respondent painting on the walls ("I hate you"), damaging Petitioner's property, causing injuries to Petitioner's body and kneeling on the floor with a can of gasoline and two knives presented a disturbing picture. While Respondent insisted this was "gas lighting" by the Petitioner and that she was the abused party, the court finds her explanations as to how she obtained her injuries unconvincing. On balance, the Court is of the opinion that Respondent was the primary aggressor, but given the totality of circumstances, the court does not believe FC §4325 sanctions are appropriate in this case.

(J) The immediate and specific tax consequences to each party

Petitioner argues there is a "recapture" issue that should be considered. No competent evidence was presented of what petitioner's tax consequences will be as a result of the sale of RSUs. Petitioner's sole testimony on this point was a blanket statement that he was asking the court to make support orders that would avoid the need for him to pay recapture⁸. The court received no evidence from anyone with a tax background establishing that petitioner would face recapture taxes and what those might be. The court may not "speculate". Although petitioner spent considerable time in his closing brief and objection to tentative statement of decision on this point, closing argument is just that

"argument". It is not evidence. Without more, the court cannot fashion a support award that assumes taxes that may or may not be owed in an unknown amount. The court notes that the property division to follow may also create tax consequences.

(k) The balance of the hardships to each party.

On balance, Respondent is most at risk here. She has no job and an incomplete education. She is also on the autism spectrum which presents its own set of challenges. Petitioner is healthy, employed and stable.

The goal that the supported party shall be self-supporting within a reasonable period of time. Except in the case of a marriage of long duration as described in Section 4336, a "reasonable period of time" for purposes of this section generally shall be one-half the length of the marriage. However, nothing in this section is intended to limit the court's discretion to order support for a greater or lesser length of time, based on any of the other factors listed in this section, Section 4336, and the circumstances of the parties.

As previously indicated, this is a marriage of short duration. Typically, a spousal support award of two years would be in keeping with the goal that Respondent be self-sufficient within one-half the length of the marriage. That goal, however, is not realistic in this case. Respondent will need time to finish her dissertation. She will then need to obtain employment which will provide appropriate accommodations. The testimony at trial strongly suggested that she has done little towards the completion of her dissertation or to develop any alternate career opportunities since the parties separated a year and a half

⁸ See Transcript (November 6, 2017) pg. 37, lines 17-22

ago. While it will require the petitioner to pay support for a longer period of time than might otherwise be expected, the Court believes an additional two years of support will be required.

(l) The criminal conviction of an abusive spouse shall be considered in making a reduction or elimination of a spousal support award in accordance with Section 4324.5 or 4325.

This section is not applicable in this case.

(m) Any other factors the court determines are just and equitable

Petitioner has been providing support to the Respondent since August 2016 in one form or another, as the court will explain under "reimbursements". Petitioner voluntarily undertook to provide direct and indirect support to the Respondent prior to her filing an RFO for support. The court therefore finds that Petitioner has already provided support to Respondent for 16 months. Part of the \$10,000 - \$12,000 the respondent claims that she requires on a monthly basis for her support is health care premiums previously covered by petitioner/petitioner's employment. This amount was estimated at \$1,500 - \$2,000 per month.

Beginning January 1, 2018 and continuing until December 31, 2019, Petitioner shall pay to Respondent as and for Spousal Support the sum of \$6,000 per month payable on the 1st day of each month. He shall also pay as additional support 15% of his separate RSU income. Considering the stated needs of the respondent, her share of the community RSUs, and all other funds available for her support, this award should meet her needs and the marital standard of living outlined above.

Of course, this award assumes that the RSUs will continue. The court reserves jurisdiction to modify this award should petitioner's employment with Yelp end for any reason or RSU income be deferred or delayed.

Respondent is advised that it is the policy of the State of California that each party make reasonable good-faith efforts to become self-supporting, and a failure to make reasonable good-faith efforts "can constitute a change in circumstances which could warrant a modification or even a termination of spousal support". *IRMO Gavron*, (1988) 203 Cal. App. 3d 705, 712.

7107 Snake Road, Oakland, CA

The parties dispute the value of the family residence located at 7107 Snake Road, Oakland, CA. At trial, Ms. Yovino-Young testified that as an expert real estate appraiser she valued the property at \$1,275,000 effective October 19, 2017. Petitioner accepts that value. Respondent believes that value fails to consider necessary and expensive repairs. Respondent provided no expert testimony to contradict Ms. Yovino-Young.

Respondent seeks to buyout Petitioner's share of the real property. To do this, she proposes to use many of the community assets to be awarded to her and/or obtain a loan with a third party, Mr. Vinh Tran. Mr. Tran did not appear at trial, nor were any documents provided to establish that he would, or even could, assist in the purchase of the house. While the court understands Ms. Adams' desire to remain in the house, insufficient evidence was provided to leave the court with any confidence of her ability to obtain the required loan. Her last minute solution with Mr. Tran is nebulous at best and, if she is right about the necessary repairs, would leave her with an expensive house in need of

repairs and no funds with which to do said maintenance. Moreover this would put further stress on her ability to complete her Ph.D. and become self-sufficient. The court is aware that Ms. Adams wants to remain in the house and feels a move would be difficult for her given her medical condition. The court notes, however, that Ms. Adams was able to move from the UK to the United States and from an apartment to the Snake Road house.

Given the above, the parties are ordered to obtain a realtor no later than January 31, 2018. If the parties can not agree on a realtor, each party is to submit to the court the names of three potential realtors and the court will appoint one. These names should be provided to the Court no later than February 5, 2018. Courtesy copies should be provided directly to department 503.

Effective March 1, 2018 or as soon thereafter as is practicable, the house is to be listed for sale. The parties are to endeavor to have all repairs incident to the sale of the property paid out of escrow. Each party is to pay one-half of all said repairs.

Petitioner and Respondent are to cooperate fully with the realtor in the sale of the home. So long as Respondent cooperates fully, she may remain in the residence until it is sold. She must maintain the property in showable condition. She will also be responsible for all continuing payments on the mortgage, taxes, utilities, and normal monthly maintenance (lawns, etc.). Should she fail to make said payments or cooperate with the listing agent, her continuing tenancy will be ended. Should Respondent choose to vacate the

property prior to sale, the parties shall share equally the ongoing expenses of the property until it is sold.

The Court accepts Ms. Bertozzi's tracing and finds that out of the proceeds of the sale of the home Petitioner is to receive reimbursement in the amount of \$69,476 for his separate property contribution to the down payment on the house. Respondent is to receive reimbursement in the amount of \$6,961.

Property Division:

Yelp stock and RSUs: The parties stipulated to use the Nelson formula to allocate Petitioner's Yelp RSUs and stock options. The court adopts Ms. Bertozzi's calculations on pages B1-B4 of her report.

Bank Accounts: Petitioner shall reimburse respondent the sum of \$235.16 for her share of the community bank accounts (chase plus savings, chase premier checking #5717, Barclay's bank #0180 and the Cooperative bank) which are confirmed to petitioner.

Furniture and Furnishings: The Court has insufficient evidence of community personal property to issue any orders for its division. The parties are to attempt to agree to a division of furniture and furnishings. The court reserves jurisdiction over this issue in the event that the parties are not able to agree on a division.

2016 Acura MDX: If Respondent wishes to retain the vehicle she may do so, provided she pays all ongoing lease payments and insurance. She must hold Petitioner harmless from any additional costs incident to the lease. If Respondent does not want to vehicle, the Acura should be turned over the

dealership. The parties are to share equally in any penalties or fees for early termination of the lease. The court reserves jurisdiction on this issue should there be damage to the vehicle, excessive mileage, or any other problems that may be attributable to only one of the parties.

The Greyhounds: It was difficult to get a straight answer from the respondent as to whether or not she wanted these dogs confirmed to her. The court is not inclined to award support for the dogs. The dogs are first awarded to Ms. Adams. Should Ms. Adams wish to keep the dogs, she must notify petitioner or petitioner's counsel within 30 days of March 1, 2018. Mr. Billings must then cooperate in having the dogs registered in Ms. Adams name. She will then be solely responsible for the dogs continued care and maintenance. Should, within 30 days of March 1, 2018, Ms. Adams decide not to keep the dogs under these requirements, the dogs will be awarded to Mr. Billings. He will then arrange to pick-up the dogs within two weeks of Ms. Billings' decision. He then will be responsible for the dogs moving forward.

RSU Overpayment: The Court finds that, pursuant to Ms. Bertozzi's report, Ms. Adams received a greater share of RSU income than called for under the Nelson formula. From the November 2016 tranche she received \$31,433.30. She should have received \$23,763.57. From the February 2017 tranche she received \$20,521.89. She should have received \$11,713.27. Respondent owes Petitioner \$16,478.35 for said overpayment.

Petitioner failed to pay Respondent bonus income as ordered by the court. The parties agree this amount is \$11,544.66. This amount shall be

subtracted from the amount owed Petitioner, leaving a balance owed to Petitioner of \$4,933.69. The court has intentionally not determined interest owing as the time periods during which these amounts were owed is similar and no calculations of interest were provided.

The Court finds the payments made by Petitioner from August 2016 through February 1, 2017 on the mortgage, property taxes, homeowner's insurance, credit card payments and cash, other than the \$5,000 attorney's fees expense, to be voluntary spousal support and not reimbursable. To the extent that these amounts exceeded the support awarded by Commissioner Clay in April 2017, the court finds they were necessary and voluntarily made and accepted. No overpayment is awarded.

The court does order Respondent to reimburse Petitioner \$978 for the insurance overpayment and \$832 for the auto accident payment all payments which the court does not consider to be for respondent's support. Although respondent in her objections claims that she testified this was for a pre-separation auto accident, the only actual testimony the court could locate on the accident was from the petitioner who testified that it was post separation.⁹ As to the Chase Premier account #3956, the community funds in that account at date of separation were \$8,470.30, petitioner testified that he paid Ms. Adam's separate Crate & Barrel obligations in the amount of \$2,061.62 with said funds. The court does not view this payment as spousal support as the items purchased were of Ms. Adam's choosing and will remain with Ms. Adams. Ms.

⁹ See Transcript (November 6, 2017) pg. 55, lines 14 - 20

Adams is entitled to reimbursement from the Chase account in the amount of \$2173.53.


Each party is to pay one-half of all community credit card debt still in existence. Each party is responsible for those charges made to community accounts after the date of separation and still owing. Those amounts are to be paid out of escrow of the family residence and deducted from the proceeds of the person who incurred said charges. Any payments made by either party towards the separate debt of the other prior to the sale of the family home shall be reimbursed in the same manner.

Attorney's fees:

Respondent has requested an award of attorney's fees under Family Code Section 2030. Despite the award of spousal support and RSU income, petitioner's available assets for the payment of fees are significantly greater than the respondent's. Petitioner has already contributed \$5,000 towards respondent's fees. Balancing the equities under FC §2030, the court orders Mr. Billings to pay an additional \$35,000 towards Ms. Adams' attorney's fees and costs. Although respondent requested that petitioner pay no less than \$60,000 towards her fees, given the totality of the circumstances including the court's analysis under FC §4320 above, the complexity of the litigation, the community property received by the respondent and the extended support burden levied against the petitioner, the court is of the opinion that \$40,000 is an appropriate contribution to respondent's fees. This amount may be paid out of petitioner's share of the proceeds from the Snake Road property.

Exhibits may be returned to the custody of the offering party at the expiration of the appeal period. It is the parties' responsibility to make arrangements with the courtroom clerk to retrieve and remove exhibits. Should the submitting party not remove exhibits within 30 days after the expiration of the time for appeal, the court orders that the materials be destroyed by the clerk without further notice.

DATED: **JAN 25 2018**



Thomas J. Nixon
Judge of the Superior Court

DECLARATION OF MAILING

I certify that I am not a party to this cause and that on the date stated below I mailed (first class, postage pre-paid) a copy of this notice to the persons thereto, addressed as follows:

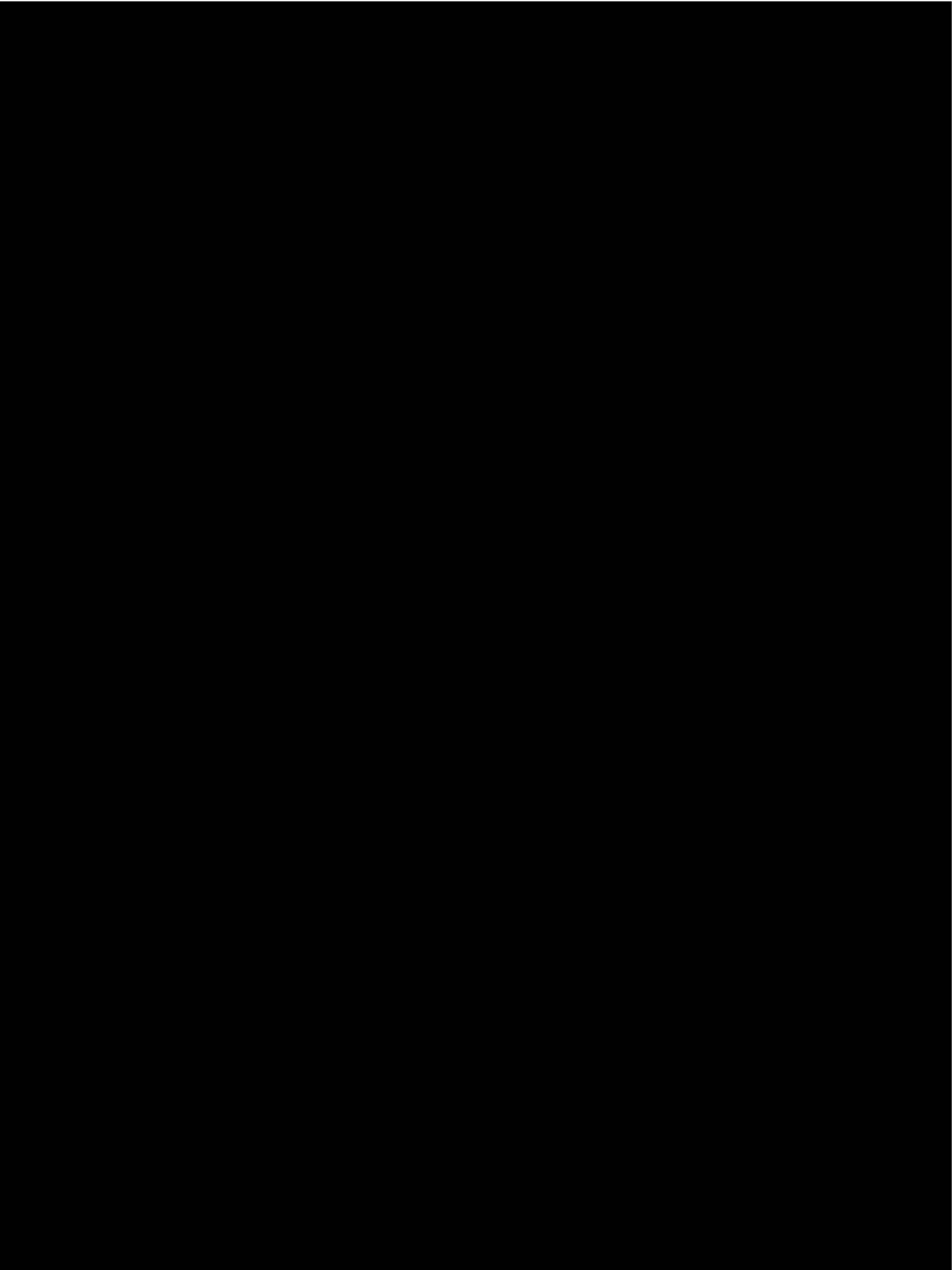
STACEY POOLE, ESQ.
Lerner-Poole LLP
535 Pacific Ave., 2nd Floor
San Francisco, CA 94133

AMANDA LIST, ESQ.
List Jacobson-Kwok Thorndal
520 – 3rd St., Ste 205
Oakland, CA 94607

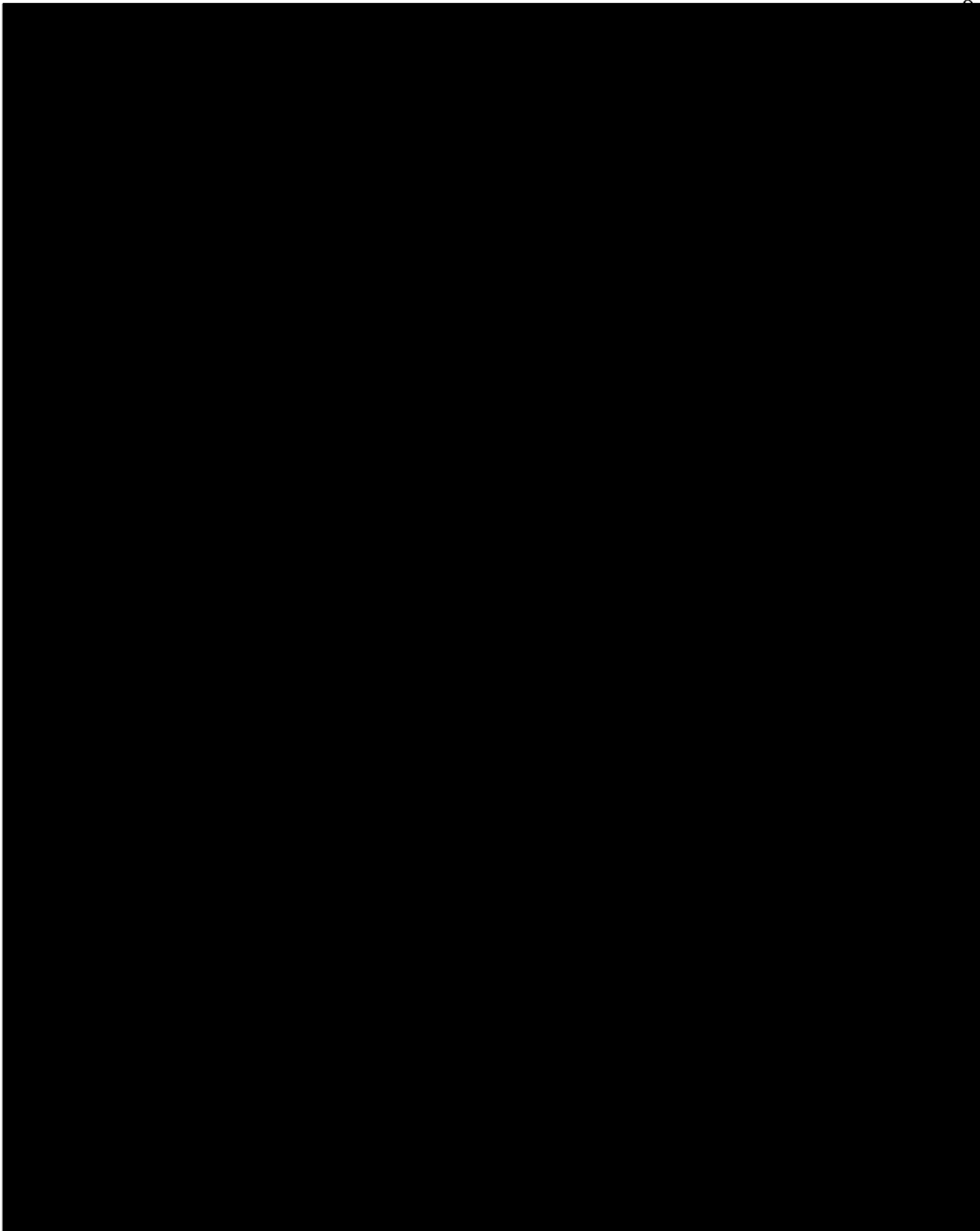
Executed at Hayward, California on January 25, 2018.

I declare under penalty of perjury that the same is true and correct.
CHAD FINKE; EXECUTIVE OFFICER/CLERK

By: Pam Young, Deputy

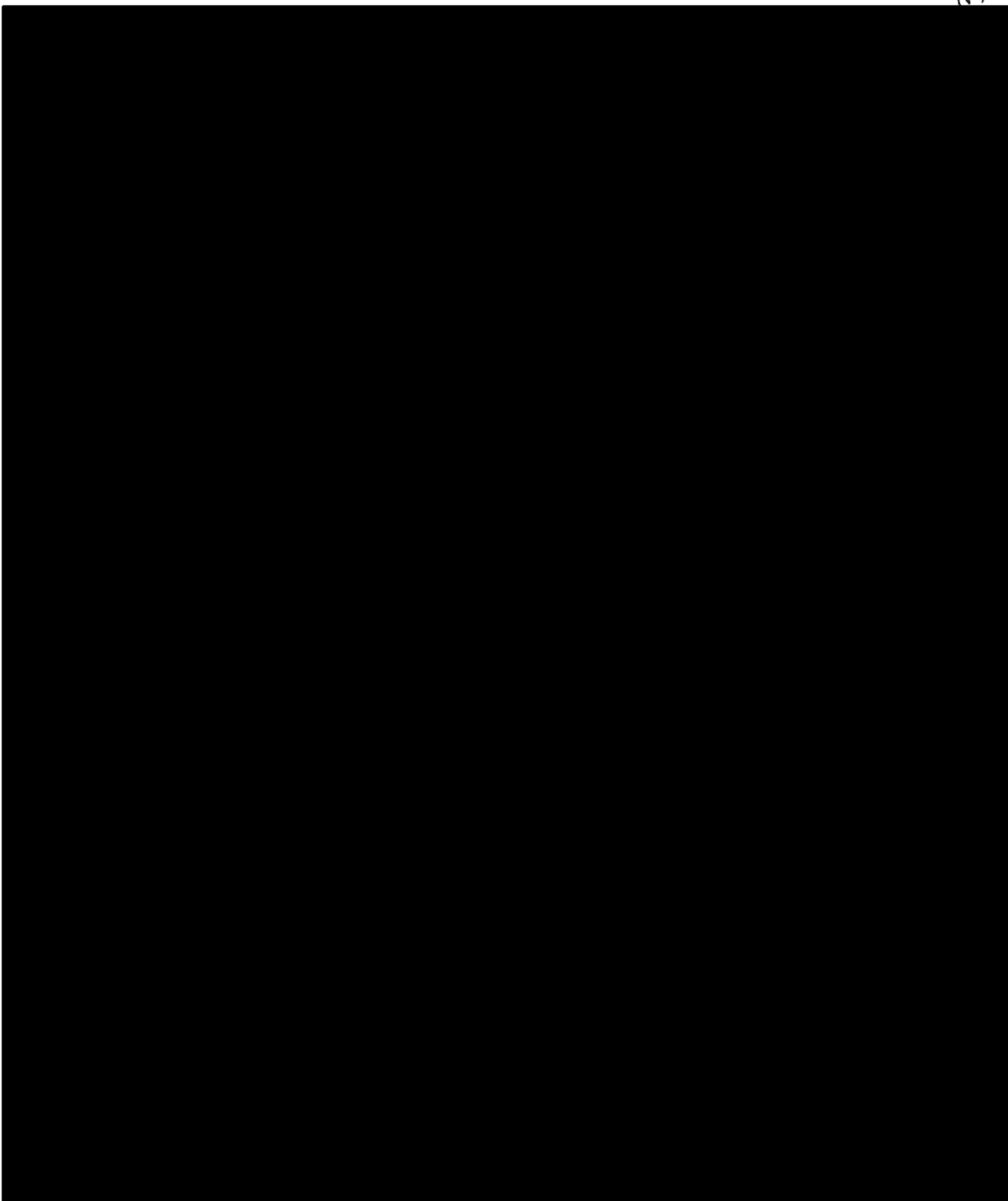


7



B2

3



63

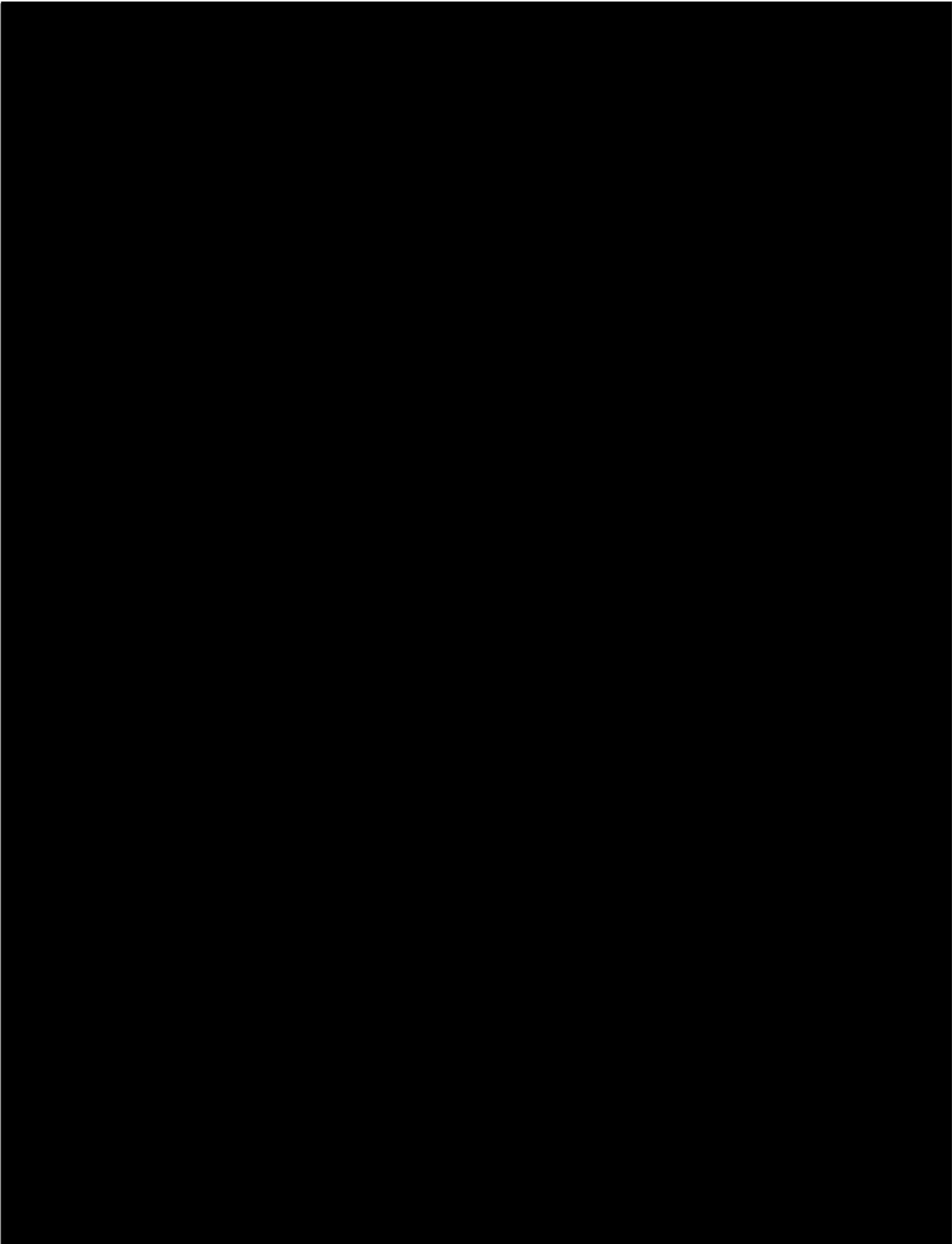


EXHIBIT 62

1 **DECLARATION OF SARRITA ANASTASIA ADAMS**

2 I, Sarrita Anastasia Adams, declare as follows:

3 1. I am the Petitioner in this action, over the age of 18, and have personal knowledge of the facts set
4 forth in this declaration. If called to testify, I would testify competently to the matters stated herein.

5 2. I own and operate *Science on Trial, Inc.* (“SoT”) from San Francisco, CA.

6 3. On September 27, 2023, Respondent initiated harassing me/SoT. **See Exh. A.**

7 4. Respondent expanded her campaign of harassment that has gone unabated. For instance,
8 Respondent made and encouraged others to make false statements about me/SoT on reddit.com then
9 later on X.com/Twitter **See Exh. B.** She/They posted the false, harassing comments under various
10 pseudonyms, including “MrJusticeGossipGirl”, “FyrestarOmega”, “JessRose”, “PaulBeach”, et al. on
11 reddit.com and X.com. In fact, from Oct. 25 – present, Respondent and her associates posted no less
12 than 3,237 comments on X.com about me/SoT. *These posts contained false and malicious statements
13 intended to harm my professional reputation and credibility as a forensic consultant.*

14 5. Respondent and her associates admitted their campaign is personal. **See Exh. C.**

15 6. They falsely accused me of being a domestic abuser which is false. **See Exh. D.**

16 7. They falsely accused me of lacking the proper professional credentials which is also false
17 because I possess a PhD in Biochemistry from Cambridge University. **See Exh. E.**

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

21 9. Despite the Court’s TRO, Respondent has continued to maintain defamatory posts about me
22 online, i.e. reddit.com, X.com, & Facebook.com, including posting content on an invitation-only
23 subreddit that is still accessible via Google. Respondent even harassed a specific employee of SOT on
24 September 13, 2024, as recently as This harassment have continued to harm my professional reputation
25 and SoT. **See Exh. G.**

26 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.

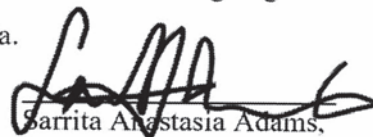

Sarrita Anastasia Adams,
Petitioner

EXHIBIT 63



UNIVERSITY OF CAMBRIDGE

I hereby certify that
SARRITA ANASTASIA ADAMS
of GONVILLE AND CAUIS COLLEGE
in the University of Cambridge
was at a full congregation holden in
the Senate-House on
29 JUNE 2017
admitted to the degree of
DOCTOR OF PHILOSOPHY
in BIOCHEMISTRY

Witness my hand this
twenty-ninth day of June, two thousand and seventeen


Administrative Officer



Registry of the University

EXHIBIT 64



Gonville & Caius College

Apply to Caius

Prospectus

EXHIBIT 65

For staff

- Home
- Offices
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Dr Jonathan Nicholls to retire as Registry of the University

- For staff
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- General news**
 - Dr Jonathan Nicholls to retire as Registry of the University
- Features
- Appointments
- Awards
- Clinical School Computing Service: IT disruption



Published
05 May 2016

Cambridge's 26th Registry has served for more than eight years during a crucial period of time for the University.

Dr Jonathan Nicholls, the University's Registry, has decided to retire on 31 December 2016.

Dr Nicholls, who is Cambridge's 26th Registry, has been in post for more than eight years. During that time he has led many major initiatives across the collegiate University, and in particular as the head of the Unified Administrative Service. When he retires Dr Nicholls will have spent 34 years in university leadership and administration and now wishes to turn his hand to other activities.

There will be plenty of time to mark his considerable achievements, and to thank him for his remarkable contribution and commitment to the collegiate University, details of which will be made available to staff nearer the time.

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EXHIBIT 66

The Registry - Ms Emma Rampton



Ms Emma Rampton

Position(s): Principal Administrative Officer of the University
Email: registry@admin.cam.ac.uk
Association(s): Unified Administrative Offices and Sidney Sussex College

The Registry is the University of Cambridge's principal administrative officer. The post-holder is head of the Unified Administrative Service (UAS) and Secretary to a number of committees, including the University Council. The Registry is also tasked with responsibility for a number of duties, including keeping and maintaining the records of the University, including its proceedings and members; editing the *Statutes and Ordinances* and the *Reporter*; receiving reports of Boards, Syndicates and other bodies; and any other duties prescribed by statute or Ordinance or by the Council.

The Registry has involvement (which may be deputized) with the following committees of the central bodies:

Central committee	Involvement
University Council	Secretary
Audit Committee	Secretary
Finance Committee	Secretary
Applications Committee	Member
Advisory Committee on Benefactions and External and Legal Affairs	Secretary
Advisory Committee on Committee Memberships and External Nominations	Attends
Honorary Degree Committee	Attends
Investment Board	Secretary
Assessment Committee	Secretary
Buildings Committee	Attends
Environmental Strategy Committee	Member
Health and Safety Executive Committee	Attends
Human Resources Committee	Member
Nominating Committee for the Office of Pro-Vice-Chancellor	Secretary

About this member:

Emma Rampton joined Cambridge in 2015 as Academic Secretary. After serving as Acting Registry from January 2017 (following the retirement of Jonathan Nicholls) she was appointed Registry from 1 October 2017.

Before Cambridge, Emma worked at the University of Oxford. She was there for over ten years, first as the Head of Administration in the Faculty of Law and latterly as Deputy University Secretary, a role in which she had responsibility for overseeing the University's governance, compliance and assurance processes. Emma graduated from St John's College, Oxford, after which she qualified as a lawyer.

Membership listings

- [University Council members](#)
- [General Board members](#)
- [Audit Committee members](#)
- [Business Committee members](#)
- [Finance Committee members](#)
- [Planning and Resources Committee members](#)
- [Resource Management Committee members](#)

The Schools

- Arts and Humanities
- Biological Sciences
- Clinical Medicine
- Humanities and Social Sciences
- Physical Sciences
- Technology

About the governance website
 Email: governance@admin.cam.ac.uk

University Administration

- Academic Division
- Estates Division
- Finance Division
- Governance and Compliance Division
- Health & Safety
- Human Resources Division
- Legal Services Division
- Research Services
- University Information Services

Council and Committee websites

- University Council
- Audit Committee
- Finance Committee
- General Board of the Faculties
- Human Resources Committee
- Planning and Resources Committee
- Other committees

Official publications

- Statutes and Ordinances
- Cambridge University Reporter:
 - Roll of the Regent House
 - Members of University bodies
 - Fellows of the Colleges list
 - Annual Reports & Financial Statements
- Budget Allocation Reports

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Spotlight on...
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EXHIBIT 67



UNIVERSITY OF CAMBRIDGE

I hereby certify that
JENG YANG CHIA
of HOMERTON COLLEGE
in the University of Cambridge
was at a full congregation holden in
the Senate-House on
1 JULY 2017
admitted to the degree of
BACHELOR OF ARTS.

Witness my hand this
first day of July, two thousand and seventeen

Kreen
Administrative Officer

Gunnar Ruyter
Acting Registry of the University



What does an official certificate from Oxford or Cambridge look like?

Answer

Follow

...

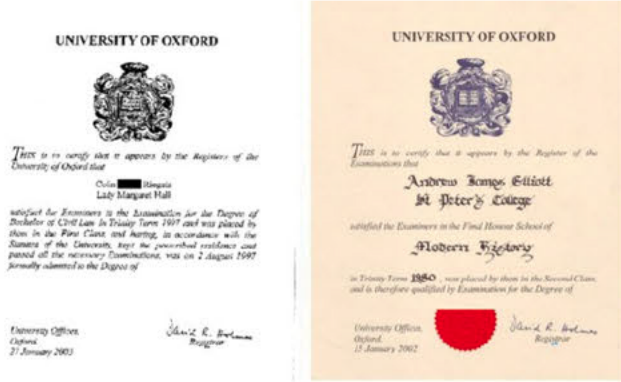
All related (34)

Sort Recommended

Colin Riegels · Follow
BCL in Law, University of Oxford (Graduated 1997) · 2y

They change a bit over the years. Here is my old one, which was pretty typical of the 80s and 90s. Unfortunately I only have a black-and-white scan of it, but I found a colour version of someone else's online which is similar (although I was too cheap to pay for the calligraphy script, which is extra - also my seal is only embossed, there was no red wafer under it to make it stand out).

I have seen more recent ones, however, and (assuming they are genuine), it seems they are now in a different format.



... (more)
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Johnny M · Follow
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Where do I begin?

I'm a massive savings nerd, and have spent an embarrassing amount of time with people discussing their money habits.

Here are the biggest mistakes people are making and how to fix them:

Overpaying on car insurance

You've probably heard this before, but the average American family overspends by \$612/year on car insurance.

If you've been with the same car insurance for years, you're likely one of them.

Pull up [coverage.com](#), a free site that will compare prices for you, answer the questions on the page, and it will show you how much you could be saving. [Here is the link](#) to try it out.

... (more)
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Stonaid Maia Elizabeth J-S · Follow
Studied Mediaeval History (Graduated 2016) · Upvoted by Simon Rose, MA, MMath Mathematics.





This is now £42. Mum bought mine for me, I was away in Australia at the time, straight after my Finals .(2009)

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Amazon Hates When Prime Members Do This, But They Can't Stop You.

This simple trick can save tons of money on Amazon, but most Prime members are ignoring it.



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Edmund Green · Follow

BA from University of Oxford · Upvoted by Simon Rose, MA, MMath Mathematics, Universit... · 2y

It's remarkably boring. These is a school of thought that less good universities have gaudier graduation gowns, and more elaborate certificates. My degree certificate gives the date when the degree was awarded, and the School in which I read. I think it also says the class

Promoted by Webflow

Metis Chan · Follow

Works at Webflow · Apr 30

What is the best way to build your own website?

With today's modern day tools there can be an overwhelming amount of tools to choose from to build your own website. It's important to keep in mind these considerations when deciding on which is the right fit for you including ease of use, SEO controls, high performance hosting, flexible content management tools and scalability. [Webflow](#) allows you to build with the power of code — without writing any.

You can take control of HTML5, CSS3, and JavaScript in a completely visual canvas — and let Webflow translate your design into clean, semantic code that's ready to publish to the web, or hand off ... [\(more\)](#)

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Homerton College, Cambridge, Law 2014-17 · Upvoted by Kiseki Hirakawa, M.Eng Engineering, University of Cambridge · 6y

Related **What does a University of Cambridge degree certificate look like?**

Awesome. Especially if you pair it with the official wooden frame.

That way you can tell people that you spent \$XYZ on not just a piece of paper, but a framed piece of paper to put on your wall.



EXHIBIT 68




UNIVERSITY OF CAMBRIDGE

I hereby certify that
CLARE WONG
of **LOW TUCK AND CARRS BUILDING**
in the University of Cambridge
was on a full-time programme leading to
the **Bachelor's Degree in
29 JUNE 2017**
awarded in the degree of
BACHELOR OF ARTS

Witness my hand this
twenty-ninth day of June, one thousand and seventeen.


Administrator


Vice-Chancellor of the University











EXHIBIT 69

Cambridge students

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- New students
- Cambridge life
- Your course**
- Exams
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Degree certificates and transcripts

Cambridge students

Your course

Graduation and what next?

Degree certificates and transcripts

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Eligibility

The Cambridge MA

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Certificates

We have now resumed our print services for the obtaining of certificates. You can place orders using the links provided in the table.

All students are normally issued with **one free paper version** of their degree certificate upon graduation. **You cannot obtain a degree certificate from Cambridge unless a degree has been conferred (awarded) at a degree ceremony either in person or in absence.**

Online certificates

Degree certificates are also available online for those who have graduated **since March 2020**. All those who graduated since March 2020 should have received an email advising how to access the certificate. If you have not received an email, then please submit a question via: student-registry-help.admin.cam.ac.uk. Online certificates will be available **10 working days following** any given ceremony.

Online certificates are currently not available to anyone who graduated prior to March 2020.

Transcripts

We have now resumed our print services for transcripts. You can place orders using the links provided in the table.

You are also able to access your transcript electronically via Digitary - it can be shared online with other organisations for job applications and at other education institutions. For further information please see the following link: [Academic Transcripts | Cambridge students](#)

Placing orders for paper certificates and transcripts

Please read all of the available information on these pages carefully before placing your order. If, having read the information, you have any questions please submit a query here: student-registry-help.admin.cam.ac.uk

- You can only place and order for a certificate or final transcript after your degree has been conferred.
- Paper versions of degree certificates and transcripts can be ordered via our Online Store. Please click the link on the item you want in the table below to access the Online Store. Once you have clicked the link for the item you wish to purchase you will be taken to the landing page for the online store – from here you will need to use the page as you would for online shopping (select quantity, add to basket, proceed to checkout etc):
- If you are experiencing issues making payments for Digitary transcript subscription please follow the advice and recommendations on the Frequently Asked Questions- [My payment for Digitary subscription is not going through](#)

Links to order your degree certificates and transcripts

Service required and link	Prices	Additional information
Paper version of Transcripts	£25, (further copies within the same order are available for purchase for £10 each here)	You must have purchased a single certificate in order to purchase additional copies. We advise that you check your transcript online before placing an order.
Paper version of Degree Certificates	£15 per degree	Your degree must have been conferred (awarded) in person or in absence at a degree ceremony for you to purchase a replacement certificate. This version is an exact replica of the original version of the certificate you received at your ceremony - the only difference will be the date of production which will be listed as the day that your order was processed.
Alternative design degree certificates with DHL	£55 per degree	Please note that you can only order an alternative degree certificate if your programme is conferred at a ceremony at Senate House. Allow up to 90 days for dispatch.
DHL delivery service	£15 per address	Only available for International addresses. You should only purchase DHL if you are ordering a paper copy of a degree certificate or transcript – DHL should not be purchased alone.

Owing to high demand it may take **up to 28 working days** to process and dispatch paper certificates and transcripts. For the alternative design degree certificates, we advise to allow **up to 3 months** for the dispatch of these. To ensure a fair service to all we are unable to

design degree certificates, we advise to **allow up to 3 months** for the dispatch of these. To ensure a fair service to all we are unable to expedite orders.

Alternative Design degree certificate

The alternative design degree certificate is a larger document and more intricate than the replacement degree certificate. Essentially, this version is a display version as opposed to one that could be used for proof of qualifications. It is in B4 and hand calligraphed with your name hence the 3 month allowable dispatch time.

Alternative Design degree certificates are not available for all programmes. Orders for Alternative Design degree certificates are only available to those with a Bachelors, Masters or Doctorate degree. They are **not** available for Postgraduate Diplomas, Postgraduate Certificates or Non-Member Diploma and Certificate Awards. Please allow up to 3 months for dispatch. If you place an order and your degree does not fit the eligible criteria listed above, your order will be cancelled and a refund processed.

DHL delivery service

The option for DHL delivery service is at an additional cost of £15.00 **per address**. Choosing DHL delivery is strongly recommended to ensure safe delivery – especially for overseas addresses. The University does not accept responsibility or liability for items lost in transit.

DHL is available to purchase on the Online Store and will need to be added to your basket as a separate item to the degree certificate.

Where multiple deliveries are required, you will need to purchase DHL separately for each different address. For example, if you need delivery to 2 different addresses you would need to add 2x DHL delivery service to your basket which would total £30.00 on top of the amount for the document(s).

General information

Requests for degree certificates **must be made by the student or former student themselves**. Requests for degree certificates by a third party will not be actioned.

If your name has changed and you wish to update this on your certificate please submit your information here: student-registry-help.admin.cam.ac.uk. You will need to attach a scanned copy of your passport ID page or other legal document to this email and this will need to be done **before** placing your order.

The Student Registry has no connection with GCSE or A-Level examinations, or overseas examinations. These are administered by Cambridge Assessment (previously known as the University of Cambridge Local Examinations Syndicate). For information on these topics (including past exam results) please visit the [Cambridge Assessment website](#).

If you have any further questions, please see the following page for Frequently Asked Questions: [Degree Certificates | Cambridge students](#) or submit a query here: student-registry-help.admin.cam.ac.uk



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EXHIBIT 70



HF20059579 Adams VS Billings

Family Law (Elder Abuse/Dependent Adult A..)

Hayward Hall of Justice / DEPT 502 - HON. Keith Fong

Filed: 04/06/2020 Disposed: 08/04/2020 Court Finding - After Court Trial

Document Download

Case Summary

Register of Actions Participants Related Cases (3)

Date	Message	Category	Download
04/06/2020	Petition for Protective Order (Elder or Dependent Adult Abuse) Filed	Filing	
04/06/2020	Temporary Restraining Order (Elder or Dependent Adult Abuse Prevention) Filed for Sarrita Anastasia	Filing	
04/06/2020	Declaration Filed	Filing	
04/07/2020	Temporary Restraining Order (Elder Abuse) Denied	Ruling	
04/07/2020	Temporary Restraining Order EA-110 Request for	EA-110	
04/07/2020	Notice of Court Hearing (Elder or Dependent Abuse Prevention) EA-109 Request for	EA-109	
04/09/2020	Domestic Violence Hearing 04/27/2020 09:00 AM D- 510	ScheduleHearing	
04/10/2020	Hearing Reset to Domestic Violence Hearing 05/21/2020 09:00 AM D- 510	ScheduleHearing	
05/07/2020	Hearing Reset to Domestic Violence Hearing 06/15/2020 01:30 PM D- 510	ScheduleHearing	
05/08/2020	Order on Request to Continue Hearing Filed	Filing	
05/11/2020	Returned Mail: Notice of Hearing Filed	Filing	
05/13/2020	Domestic Violence Hearing 06/03/2020 01:30 PM D- 503	ScheduleHearing	
05/27/2020	Notice of Limited Scope Representation Filed	Filing	
06/01/2020	EA-100 Hearing: Petitioner- Sarrita Adams' Trial Brief Filed	Filing	
06/01/2020	Supplemental Declaration in Support of Request for Order Restraining Order Filed	Filing	
06/01/2020	EA- Hearing: Request for Teleponic Appearance for Witness Terrence Adams Filed	Filing	
06/01/2020	Proposed Order Received	Filing	
06/01/2020	EA-100 Hearing: Request for Telephonic Appearance for Witness Doctor Harmony Satre Filed	Filing	
06/01/2020	Proposed Order Received	Filing	
06/01/2020	Proof of Service by Mail Filed	Filing	
06/01/2020	Miscellaneous EA-100Hearing: Petitioner- Sarrita Adams' Trial Brief	ZTH068	
06/01/2020	Supplemental Declaration in Support of Request for Order Restraining Order	SUP002	
06/02/2020	Continue Hearing and Reissue Temporary Restraining Order (Elder Abuse) Restraining Order Filed by Pe	Filing	
06/02/2020	Draft Restraining Order Entered	Ruling	
06/02/2020	NOH and Reissue Temporary Restraining Order EA- 116	EA- 116	
06/02/2020	Notes: fax filing printed (6/2/20)	Filing	
06/02/2020	Continue Hearing and Reissue Temporary Restraining Order (Elder Abuse) Denied	Ruling	
06/02/2020	Response to Request for Elder or Dependent Adult Restraining Order Filed for John Nicholas Billings	Filing	
06/02/2020	Proof of Service Electronic Service Filed	Filing	
06/02/2020	EA-100 Request to File Exhibit 3 (Supplemental Declaration) & Exhibit 7 (EA-100 Trial Brief) Under F	Filing	
06/02/2020	Proposed Order Received	Filing	
06/02/2020	Proof of Service by Mail (EA-100 Request to File Exhibits Under Seal) Filed	Filing	
06/03/2020	Domestic Violence Hearing Commenced and Continued	Hearing	

06/03/2020	Hearing Continued to Domestic Violence Hearing dept: 503 date: 06/24/2020 time: 01:30 PM	ScheduleHearing
06/03/2020	TRO Denied Pending Hearing Filed	Filing
06/04/2020	Notes: fax filing printed (6/4/20)	Filing
06/04/2020	Notes: Sent to D510	Filing
06/05/2020	Order Denying Telephonic Appearance Filed	Filing
06/05/2020	Order Denying Telephonic Appearance Filed	Filing
06/08/2020	Hearing Reset to Domestic Violence Hearing 06/15/2020 01:00 PM D- 510	ScheduleHearing
06/08/2020	Order Granting Sealing Order Filed	Filing
06/08/2020	Confidential exhibits from filing 6/1/20 sealed order from 6/8/20	Filing
06/08/2020	Notes: mailed copies	Filing
06/09/2020	Domestic Violence Hearing Hearing Dropped from dept: 510 date: 06/15/2020 time: 01:00 PM	ScheduleHearing
06/09/2020	Application Re: Other Ex Parte Filed: - Request to File Exhibit 3 (Supp Dec) & Ex 7 under Seal	Filing
06/09/2020	Proposed Order Received	Filing
06/09/2020	Proof of Service Filed	Filing
06/09/2020	Notes: fax filing printed	Filing
06/09/2020	Notes: Sent to D522 for D503	Filing
06/10/2020	Hearing Reset to Domestic Violence Hearing 06/24/2020 01:00 PM D- 503	ScheduleHearing
06/17/2020	Order Sealing Record Filed	Filing
06/23/2020	Motion to File Exhibit 2 of Motion to Stay Based on Petitioner's Incompetence Under Seal Filed	Filing
06/23/2020	Motion to Stay Proceedings on the Basis of Petitioner's Incompetence & Under Cal. Code Civil Filed	Filing
06/24/2020	Domestic Violence Hearing Commenced and Completed	Hearing
06/24/2020	Domestic Violence Hearing 07/13/2020 01:30 PM D- 503	ScheduleHearing
06/24/2020	TRO Denied Pending Hearing Filed	Filing
06/26/2020	Notes: fax filing printed (6/26/20)	Filing
06/26/2020	Notes: Sent to D513 for D503	Filing
06/29/2020	Order Granting sealing order Filed	Filing
06/29/2020	Confidential to Seal Exhibit 2 of motion to stay proceed. (filed 6/23/20)	Filing
06/30/2020	Notes: Mailed copy	Filing
07/08/2020	Reply to respondent's Opposition to stay Proceeding Based on Petitioner Incompetence Filed	Filing
07/08/2020	Proof of Service served by Electronic Filed	Filing
07/13/2020	Domestic Violence Hearing Commenced and Continued	Hearing
07/13/2020	Hearing Continued to Domestic Violence Hearing dept: 503 date: 08/04/2020 time: 09:00 AM	ScheduleHearing
07/13/2020	TRO Denied Pending Hearing Filed	Filing
07/17/2020	Substitution of Attorney Filed for Sarrita Anastasia Adams	Filing
07/17/2020	Proposed Order Received	Filing
07/21/2020	Notes: fax filing printed (07/17)	Filing
07/21/2020	Notes: FOAH Routed to D503	Filing
07/27/2020	Rejection Letter Issued on Declaration	Issue
08/04/2020	Domestic Violence Hearing Commenced and Completed	Hearing
08/04/2020	Petition for Protective Order (Elder or Dependent Adult Abuse) Dropped	Ruling

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