No. S258498

IN THE SUPREME COURT OF CALIFORNIA

JANE DOE,

Plaintiff, Cross-defendant, and Respondent,

v.

CURTIS OLSON,

Defendant, Cross-complainant, and Appellant.

AFTER A DECISION BY THE COURT OF APPEAL,
SECOND APPELLATE DISTRICT, DIVISION EIGHT
CASE NO. B286105

OPPOSITION TO REQUEST FOR JUDICIAL NOTICE AND CROSS-MOTION TO STRIKE APPELLANT'S "CONSOLIDATED ANSWER TO MULTIPLE AMICUS BRIEFS" AND "RECORDS OF WHICH JUDICIAL NOTICE IS REQUESTED"

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Plaintiff, Cross-Defendant, and Respondent Jane Doe, respectfully opposes Defendant, Cross-Complainant, and Appellant Curtis Olson's Request for Judicial Notice and cross-moves to strike from the public record (1) the Consolidated Answer to Amicus Briefs and (2) the Court Records of Which Judicial Notice is Requested that Olson contemporaneously submitted with his Request for Judicial Notice.

Specifically, Olson purports to seek judicial notice of over 250 pages of judicial records relating to ancillary litigation between him and Doe. Those records have no relevance whatsoever to the legal issues presented in this appeal or to the broader policy context addressed by amici. Rather, the only possible basis for including the records appears to be to provide something to cite so as to ostensibly substantiate his attacks on Doe and dispute the credibility of her allegations against him. Worse yet, Olson's filings create a significant risk of revealing Doe's identity and explicitly reveal her mother's name—despite the fact that Doe has been permitted to sue pseudonymously pursuant to statute. Such conduct is

inexplicable and does nothing to facilitate this Court's resolution of the legal questions presented. Accordingly, the Request for Judicial Notice should be denied and the Court should strike both Olson's Consolidated Answer to Amicus Briefs and the Court Records of Which Judicial Notice is Requested.

I. BACKGROUND

This Court has agreed to review two legal questions stemming from a mediated stay-away agreement into which the parties entered during civil harassment restraining order ("CHRO") proceedings that Doe initiated against Olson following his assault and harassment of her, Doe's subsequent civil suit for damages, and Olson's counterclaim asserting that Doe's damages suit breached a non-disparagement clause in the agreement. The first question asks whether "the litigation privilege of Civil Code section 47, subdivision (b), appl[ies] to contract claims [like Olson's counterclaim], and if so, under what circumstances." The second asks whether "an agreement following mediation between the parties in an action for

a . . . restraining order, in which they agree not to disparage each other, bar[s] a later unlimited civil lawsuit [like Doe's damages suit] arising from the same alleged sexual violence."

Two groups of amici submitted briefs supporting Doe (none supported Olson). The first was submitted by a coalition of 18 non-profit organizations and individuals dedicated "to ensur[ing] that survivors of sexual violence and domestic violence have full access to the judicial system and all applicable remedies." (FVAP Br. 10.)[1] In addition to discussing precedent and various victims-rights legislation, this coalition, led by the Family Violence Assistance Project ("FVAP"), "use[d] extensive secondary authority . . . , such as detailed statistical information [and] publications" to "demonstrate

[1] "OB" refers to Doe's Opening Brief on the Merits, "RB" to Doe's Reply Brief on the Merits, "FVAP Br." to the amici brief submitted by the Family Violence Appellate Project et al., "Med. Br." to the amici brief submitted by John K. Mitchell et al., "RJN" to Olson's Request for Judicial Notice, "Ans." to Olson's Consolidated Answer to Amicus Briefs—all filed with this Court. "AA" refers to Appellant's Appendix filed with the court of appeal. All such references are followed by the applicable page reference.

the total or long-term impact of the court's [eventual] decision" on the questions under review. (California Civil Appellate Practice (Cont.Ed.Bar 3d ed. 2020) §§ 14.35 & 14.37 [describing how amici will "[f]requently" serve this function and "frequently" do so with presentations like FVAP's].) To this end, FVAP explained:

> (1) how California's long-standing public policy of protecting survivors supports their unfettered access to the courts; (2) the context of restraining order matters, including their purpose, the limitations survivors already face when settling these matters, and the difficulties of using court mediation for survivors because of power imbalances, trauma, and frequent lack of representation; and (3) the critical need for informed consent in mediation to support survivors of sexual and domestic violence, and why survivors should not be interpreted as waiving their fundamental right to petition absent clear and express waiver language.

(FVAP Br. 12.)

The second brief was submitted by two leading members of the Southern California mediation community, each with extensive experience conducting CHRO mediations like the one that gave rise to the stay-away agreement at issue in this

case. (See Med. Br. 5-8.) They took a "narrower focus," limiting themselves to the second question presented (California Civil Appellate Practice, *supra*, § 14.35), and explained that a mediated stay-away agreement like the one at issue here should not be interpreted to bar a subsequent damages suit because of the statutory limits on CHRO proceedings, the admonitions that CHRO mediators are trained to give the parties, and the admonitions that the CHRO court and mediator in this case actually gave. (See generally Med. Br. 12-20.)

Both briefs were unassailably appropriate examples of amicus advocacy for a case on California's biggest litigation stage, which will result in broadly applicable rules relating to the scope of section 47's litigation privilege (the first question presented) and to the impact of non-disparagement agreements reached during restraining-order proceedings (the second question presented). (See California Civil Appellate Practice, *supra*, §§ 14.35 & 14.37 [describing how amici "[f]requently" take the approaches that FVAP and the mediators have here].)

In response to the amici briefs, Olson submitted (1) a "Consolidated Answer to Multiple Amicus Curiae Briefs"; (2) a request for judicial notice of over 250 pages of superior court dockets, transcripts, and orders from other litigations in which Doe is a party that Olson claims "are relevant to this Court's consideration of the amici briefs" (RJN 7); and (3) the over 250 pages of records themselves. Notably, although Olson labeled his Answer a "consolidated" one, he nowhere addresses the mediators' brief despite its relevance to the second question presented and proper scope and presentation.[2] And while Olson does somewhat respond to FVAP's brief insofar as he argues over a few pages that the "clearly-defined, statutory provisions" enacted to protect abuse victims that FVAP discussed "obviate the need for a common law rule here" (Ans. 8; see also *id.* at 8-11), the rest of his supposed response to amici—both before and after the section discussing existing

[2] Olson has a footnote in which he assigns the acronym "MAB" to the mediators' brief, but then never mentions it again. (Ans. 6, fn.1.)

statutory protections—is dominated by protestations of his innocence, assertions that he is the victim, and smears on Doe. In fact, Olson even went so far in his Answer—in clear violation of the Civil Code, which prohibits a pseudonymous plaintiff's opponent from publicly filing "any . . . information . . . from which the plaintiff's identity can be discerned" (Civ. Code, § 1708.85, subd. (f)(3)(A))—as identifying the city in which Doe purportedly has a "luxury condominium" and her mother's full name (a "California-barred attorney") to assert that Doe "is not a destitute or homeless victim."[3] (Ans. 13.) Additionally, the only-partially-redacted information in the over-200 pages of superior court dockets of which he seeks judicial notice makes it easy to locate the cases in question and identify the redacted litigants.[4]

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[3] Doe was, in fact, granted in forma pauperis status by the superior court, the court of appeal, *and this Court* based on her indigency, and undersigned counsel represent her on a pro bono basis.

[4] Doe focuses here on Olson's March 25, 2021 "Revised" volume of court records. Olson's original submission on March 22, 2021, contained Doe's actual name in at least 14 places, which Olson redacted after undersigned counsel

II. THIS COURT SHOULD DENY OLSON'S REQUEST FOR JUDICIAL NOTICE

There is no dispute that this Court is empowered to take judicial notice of "[r]ecords of . . . any court of this state." (Evid. Code, § 451, subd. (d).) It remains incumbent on the proponent of such records, however, to establish that the records are relevant "to the dispositive point on appeal." (Cal. Prac. Guide: Civ. App. & Writs (The Rutter Group Nov. 2020 ed.) § 5:156.2 ["Appellate courts will not take judicial notice of matters irrelevant to the dispositive point on appeal."]; see also *Mangini v. R.J. Reynolds Tobacco Co.* (1994) 7 Cal.4th 1057, 1063 ["We . . . 'decline' to judicially notice material that 'has no bearing on the limited legal question at hand.'"].) This Olson has not done.

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brought Olson's violations of section 1708.85 to the attention of his counsel. Notably, although Doe's counsel pointed out the other violations of section 1708.85 to Olson's counsel and asked that Olson "withdraw and remove the [offending] documents . . . from the [public] docket," Olson took no additional corrective action. (See attached Declaration of Jean-Claude André ("André Decl.") ¶ 3.)

Olson's only proffered justification for judicial notice of the over 250 pages of state-court records that he has submitted is that they "are relevant to this Court's consideration of the amici briefs submitted" in support of Doe. (RJN 7.) On its face, such a broad and conclusory assertion is insufficient. Perhaps that is all that he has offered because there is no proper basis for their relevance. As explained above, the only ostensibly proper response that Olson has offered to either amici brief is his relatively succinct argument in response to FVAP that existing statutory protections for abuse victims "obviate the need for a common law rule here." (Ans. 8; see also *id.* at 8-11.) That brief argument, however, is a policy and law-based one for which records relating to Doe's other litigations, socio-economic status, and her mother's identify and occupation are plainly irrelevant.

Olson's remaining arguments about Doe's pursuit of judicial protections and remedies in other litigations, the likely result of those still-pending matters, and Doe's socio-economic status are entirely irrelevant "to the dispositive point" before

this Court. (Cal. Prac. Guide: Civ. App. & Writs, *supra*, § 5:156.2.) This Court has agreed to address the two questions presented because they are important and will establish broadly applicable rules relating to both the scope of section 47's litigation privilege (the first question presented) and to the impact of non-disparagement agreements reached during restraining-order proceedings (the second question presented). Moreover, they are questions of law, such that nothing about the questions themselves or this Court's resolution of them calls for the consultation of extra-record material relating to Doe (or Olson or any other particular individual). (See, e.g., *Deveny v. Entropin, Inc.* (2006) 139 Cal.App.4th 408, 418 [denying judicial notice of decision in related federal proceeding because appeal invoked de novo standard of review and "[w]e therefore do not consider the ruling of another court on a related matter to be relevant to or helpful toward this task"].)

Nor has anything about FVAP's discussion of "the total or long-term impact of the court's [eventual] decision" on the

questions presented made Doe's litigation history, socio-economic status, or her mother's identity and occupation relevant. (California Civil Appellate Practice, *supra*, § 14.35.) Olson's apparent rejoinders are that these facts about Doe establish that "Doe . . . does not categorically belong to the class of 'survivors' whom the amici support" and that "[i]t cannot be credibly said, as amici do, that Doe has at all been 'silenced.'" (Ans. 6, 11.) First, it is not Olson's prerogative to declare whom FVAP and the 17 other amici joining it "support"—let alone to categorize survivors of sexual abuse and harassment into "classes." (See *id.* at 13 [asserting that amici "obscure" the fact that "Doe is not a destitute or homeless victim"].) Second, and contrary to Olson's straw-man assertion, FVAP has not claimed that Doe *has been* "silenced." (*Id.* at 6, citing FVAP Br. 45.) Rather, FVAP—like Doe—has argued that the effect of the rules advanced by the court of appeal and Olson, if adopted by this Court, would be to silence victims of sexual abuse and harassment. (FVAP Br. 30, 39, 45; see also OB 14, 66; RB 8, 15-16, 38, 40.) That those proposed rules have not

yet silenced *Doe*, which she has acknowledged in her briefing to this Court in any event, is irrelevant to the legal issues before the Court. (RB 38 [acknowledging that Olson's strategy "has not chilled Doe's pursuit of redress"].)

To be sure, Olson needs his compendium of state-court records to make his attack on Doe look lawyerly; without the records, he would have hardly anything to cite following each of his assertions. But just as a litigant cannot use the existence of irrelevant material to justify making an otherwise irrelevant argument, a litigant cannot make irrelevant arguments in a brief and then manufacture the required relevance for judicial notice by pointing back to the brief's arguments. Put simply, the state-court records of which Olson seeks judicial notice are not relevant to the legal questions before the Court, and his election to ground his "Consolidated Answer" to amici in those records does not make them relevant. Olson's request for judicial notice should be denied.

III. THIS COURT SHOULD STRIKE OLSON'S "CONSOLIDATED ANSWER" AND COMPENDIUM OF COURT RECORDS

In addition to denying Olson's request for judicial notice, this Court should strike (1) his Consolidated Answer to Amicus Briefs and (2) the Court Records of Which Judicial Notice is Requested because, in addition to being irrelevant and inflammatory, they violate Civil Code section 1708.85, and Olson already had the opportunity to cure his violations but elected not to do so.

Since this suit's initiation, Doe has pursued her claims pseudonymously pursuant to section 1708.85. (See AA 5.) Civil Code section 1708.85 requires that "[a]ny party filing a . . . document" in an action in which the plaintiff is so proceeding "shall exclude or redact any identifying characteristics of the plaintiff from the pleading, discovery document, or other document." (Civ. Code., § 1708.85, subd. (f)(2)(B)(i).) The Legislature provided that "'[i]dentifying characteristics' means name or any part thereof, address or any part thereof, *city or unincorporated area of residence* . . . or *any other information*

. . . from which the plaintiff's identity can be discerned." (Civ. Code., § 1708.85, subd. (f)(3)(A), italics added.)

As discussed above, Olson's "Consolidated Answer" concludes with a pointed paragraph identifying the city in which Doe purportedly has a "luxury condominium" and her mother's full name (a "California-barred attorney") to assert that Doe "is not a destitute or homeless victim." (Ans. 13.) The Court Records of Which Judicial Notice is Requested name her mother 37 times, and the gratuitous docket entries that Olson chose to submit are only scantly redacted, making it easy to locate the cases in question and identify the redacted litigants.

Olson's choice to include this information from which Doe's identity can be discerned is inexplicable. (See Civ. Code, § 1708.85 ["The responsibility for excluding or redacting the name or identifying characteristics of the plaintiff from all documents filed with the court rests solely with the parties and their attorneys."].) After all, he has done so as part of an

unmistakable effort to smear Doe under the guise of responding to amici briefs, and has done so here and now before our State's highest Court where decorum and professionalism should be at their apex. Worse, the day after Olson's submission of these documents, Doe's counsel alerted Olson's counsel to the fact that Olson had placed this protected information (which, at the time, also included at least 14 references to Doe's actual name) into this Court's public record, explained its irrelevance, and asked that he "withdraw and remove the [offending] documents . . . from the [public] docket." (See André Decl. ¶ 3.) Olson's counsel submitted only a barely revised version of the Court Records of Which Judicial Notice is Requested, removing the instances in which Doe's actual name appeared. He has refused to withdraw the documents altogether or take any action to correct his Consolidated Answer or the other aspects of the Court Records of Which Judicial Notice is Requested "from which [Doe's] identity can be discerned," as required. (Civ. Code., § 1708.85, subd. (f)(3)(A).)

Information from which Doe's identity can be discerned should never have been filed in a public document. That is particularly so in cases in which this Court has granted review because the Court posts briefs and substantive documents (*i.e.*, requests for judicial notice) publicly on its website once a case has been argued (see "Briefs in Argued Cases," https://www.courts.ca.gov/2951.htm), such that the information would be readily accessible to anyone with an internet connection. Indeed, statutes like section 1708.85 permitting the use of pseudonyms and requiring litigants to honor them exist largely to protect against the ubiquity of internet disclosures. (See *Starbucks Corp. v. Superior Court* (2008) 168 Cal.App.4th 1436, 1453, fn.7 ["The judicial use of 'Doe plaintiffs' to protect legitimate privacy rights has gained wide currency, particularly given the rapidity and ubiquity of disclosures over the World Wide Web."].)

At minimum, however, once Olson's transgressions were pointed out to him, he should have promptly remedied them

all. He has elected not to do so, such that the Court's intervention is needed. Olson's Consolidated Answer to Amicus Briefs and the Court Records of Which Judicial Notice is Requested should be stricken from the public record.

* * *

For the foregoing reasons, Olson's Request for Judicial Notice should be denied, and his (1) Consolidated Answer to Amicus Briefs and (2) Court Records of Which Judicial Notice is Requested should be stricken.

Dated: April 6, 2021

Respectfully submitted,

BRYAN CAVE LEIGHTON PAISNER LLP

By: _____
Jean-Claude André
Attorneys for Plaintiff, Cross-defendant, and Respondent

DECLARATION OF JEAN-CLAUDE ANDRÉ

I, Jean-Claude André, declare:

1. I am an attorney at law duly admitted to practice in the State of California. I am lead appellate counsel for Plaintiff, Cross-Defendant, and Respondent, Jane Doe.

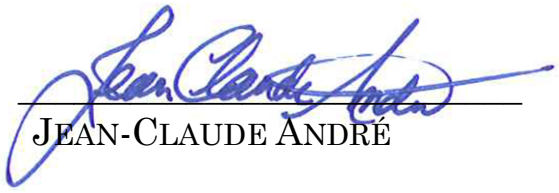
2. On March 22, 2021, Defendant, Cross-Complainant, and Appellant Curtis Olson submitted three documents to this Court in *Doe v. Olson*, No. S258498: (1) a "Consolidated Answer to Multiple Amicus Briefs"; (2) "Appellant's Request for Judicial Notice of Court Records in Support of Consolidated Response to Amici Briefs"; and (3) "Court Records of Which Judicial Notice is Requested."

3. The following day, I emailed counsel for Olson, Mr. Robert Collings Little, to alert him that Olson's filings violated Civil Code § 1708.85 in multiple ways and "ask[ed] that [he] withdraw those documents **immediately**, and take whatever other corrective action is required to remediate what amounts to the public doxing of Ms. Doe." My email to Mr. Little went on to explain in relevant part:

> Ms. Doe, as you know, has pursued this suit pseudonymously pursuant Cal. Civ. Code § 1708.85. *See Starbucks Corp. v. Superior Court*, 168 Cal. App. 4th 1436, 1453 n.7 (2008) ("The judicial use of 'Doe plaintiffs' to protect legitimate privacy rights has gained wide currency, particularly given the rapidity and ubiquity of disclosures over the World Wide Web."). However, her true name appears in the compendium of court records repeatedly (at least 14 times), her mother is identified in the Answer (p. 13) and then named 37 times in the compendium of court records, and the only-partially-redacted docket information in the compendium of court records makes it easy to locate the cases in question and identify the redacted litigants. *See* Cal. Civ. Code § 1708.85(f)(2)(B)(i) ("Any party filing a pleading, discovery document, or other document in the action shall exclude or redact any identifying characteristics of the plaintiff from the pleading, discovery document, or other document."); *id.* § 1708.85(f)(3)(A) ("'Identifying characteristics' means *name or any part thereof*, *address or any part thereof*, [or] *city or unincorporated area of residence* . . . ." (emphases added)). Furthermore, we note that there does not appear to be any legitimate purpose for dumping these documents on the public record, as Ms. Doe's physical ability to file lawsuits is not in contention, and the RJN appears to seek little more than to reiterate that unobjectionable fact. *See* Cal. R. Ct. 8.252(a)(2) (requiring request for judicial notice to establish, inter alia, why the matter is relevant).

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

Executed this 6th day of April 2021 in Los Angeles, California.



JEAN-CLAUDE ANDRÉ

PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 120 Broadway, Suite 300, Santa Monica, CA 90401-2386.

On April 6, 2021, I served the foregoing document described as: **OPPOSITION TO REQUEST FOR JUDICIAL NOTICE AND CROSS-MOTION TO STRIKE APPELLANT'S "CONSOLIDATED ANSWER TO MULTIPLE AMICUS BRIEFS" AND "RECORDS OF WHICH JUDICIAL NOTICE IS REQUESTED"** on all interested parties in this action as follows (or as on the attached service list):

SEE ATTACHED SERVICE LIST

☒ (VIA U.S. MAIL): I served the foregoing document(s) by U.S. Mail, as follows: I placed true copies of the document(s) in a sealed envelope addressed to each interested party as shown above. I placed each such envelope with postage thereon fully prepaid, for collection and mailing at Bryan Cave Leighton Paisner LLP, Santa Monica, California. I am readily familiar with Bryan Cave Leighton Paisner LLP's practice for collection and processing of correspondence for mailing with the United States Postal Service. Under that practice, the correspondence would be deposited in the United States Postal Service on that same day in the ordinary course of business.

☒ (VIA E-SERVICE): I served the above-referenced document(s) to be transmitted by electronic service to its intended recipient(s) indicated above via the Court's Electronic Filing System operated by ImageSoft TrueFiling (TrueFiling).

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

Executed on April 6, 2021 at Santa Monica, California.

Raul Morales

SERVICE LIST

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STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

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Case Number: **S258498**
Lower Court Case Number: **B286105**

1. At the time of service I was at least 18 years of age and not a party to this legal action.

2. My email address used to e-serve: **jcandre@bclplaw.com**

3. I served by email a copy of the following document(s) indicated below:

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This proof of service was automatically created, submitted and signed on my behalf through my agreements with TrueFiling and its contents are true to the best of my information, knowledge, and belief.

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

4/6/2021

Date

/s/Jean-Claude Andre

Signature

Andre, Jean-Claude (150628)

Last Name, First Name (PNum)

Bryan Cave Leighton Paisner LLP

Law Firm