№ S258498

In the

Supreme Court

of the

State of California

JANE DOE,
Plaintiff, Cross-Defendant, Respondent, and Petitioner,

vs.

CURTIS OLSON,
Defendant, Cross-Complainant, and Appellant.

AFTER THE UNPUBLISHED OPINION AFFIRMING
AND REVERSING ANTI-SLAPP ORDERS BY THE
SECOND DISTRICT COURT OF APPEAL, DIVISION EIGHT
№ B286105
HON. MARIA E. STRATTON, ASSOCIATE JUSTICE;
HON. TRICIA A. BIGELOW, PRESIDING JUSTICE; AND
HON. ELIZABETH A. GRIMES, ASSOCIATE JUSTICE

LOS ANGELES COUNTY SUPERIOR COURT
№ SC126806
HON. CRAIG D. KARLAN, JUDGE

OPPOSITION TO DOE'S "CROSS-MOTION" TO STRIKE OLSON'S CONSOLIDATED ANSWER TO MULTIPLE AMICUS CURIAE BRIEFS

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OPPOSITION TO DOE'S "CROSS-MOTION" TO STRIKE OLSON'S CONSOLIDATED ANSWER TO MULTIPLE AMICUS CURIAE BRIEFS

Olson opposes Doe's counsel's unusual cross-motion to strike his consolidated answer to the multiple amicus briefs.

1. When Doe's reputation-ruining accusations against Olson are adopted by amici in the public record, Doe's motion to strike Olson's responsive defense works an injustice

By Doe's counsel's approach, Doe unilaterally gets to control the Court's narrative from every perspective, so his response to the amici is "stricken." Olson must permit Doe and the amici to call him a sexual "abuser" while they term Doe a "survivor" of his abuse, and he must not dare deny it. Nor can he reveal anything in the public record that heaps doubt on Doe's narrative.

In this way Olson is not permitted to advocate for his name and reputation in the face of Doe's calumny adopted by amici even after an adjudication in his favor in public court records. Those records must be sanitized out of existence — "stricken," Doe's counsel says, with needless high dudgeon and scorn. If Olson cannot even be heard to advocate for himself by striking his answer to the amici briefs on Doe's say-so, then there cannot be justice here.

Doe's motion to strike should be denied, and Olson's response to the amici briefs supported by the Superior Court's records should stand. The Court can determine the "tenor" of its notice that

Doe's duplicative allegations against Olson have been adjudicated against her and in favor of Olson. (Evid. Code, § 459.)

2. Despite Olson's respect for Doe's pseudonym, Doe has voluntarily and repeatedly revealed her true identity in connection with this Supreme Court case in numerous public records

Doe's counsel accuses Olson of "creat[ing] a significant risk of revealing Doe's identity." (Mot. 3). Not only is this untrue, but also it is impossible for Olson to do so when Doe has already done so.

Doe has repeatedly revealed her true identity without a pseudonym in many public court filings and sworn declarations in which she identifies this Supreme Court case, this Supreme Court case number (sometimes correctly, sometimes incorrectly), her counsel here, and the amici's names. (E.g., Exhibit A, pp. 7, 8 & 14 [¶22].)

Though Doe, her counsel, and amici publicly castigate Olson by name (cf. ABM 57–59), Olson's counsel went to great lengths to respect Doe's pseudonymity, redacting even parts of public case numbers though unnecessary. Why? Because Doe has knowingly revealed her true identify numerous times in a pageantry of public court records in cases she has filed against Doe and in those of Olson. Her own revealing of her identity in relation to this case has nothing to do with Olson, and her counsel's argument about risking revealing Doe's identity doesn't wash with reality.

Doe did so on October 21, 2020, for example, in her "reply demur-rer" in *Curtis Olson v. [Jane Doe]*, Los Angeles County Superior Court Case No. ▒▒▒▒▒▒▒6503, when she signed her real name

to a public court filing explicitly referencing this Supreme Court case, by name and case number, referencing her real name in her declaration, and attaching unredacted copies of amici letters from this case as exhibits, telling the trial judge in the briefing (which she also signed in her real name):

> Curiously, a pattern has been emerging where some of the various judges in Defendant's related cases don't appear to care about the law. Another example, the Court of Appeal judges didn't mind violating state law by destroying Defendant's day in court, which brave judge John K. Mitchell called out in his amicus letter to the California Supreme Court. (See Decl. [redacted] **Ex. I).** The lawless of the situation has been pushed to the absolute absurdity, similar to the Jeffrey Epstein case, as pointed out by another amicus letter in support of Defendant's granted California Supreme Court case (*Doe v Olson* Case No. S258498):

Exhibit A, p. 7:8-15 & 14 [¶ 22] [redacted]. There are more than a dozen public filings by Jane Doe in which she herself connects her real identity with this Supreme Court case.

Pseudonymity is "near anonymous" by definition, but it does not mean absolute secrecy. (*Press-Enterprise Co. v. Superior Court* (1986) 478 U.S. 1, 7 (*Press-Enterprise II*) ["The right to an open public trial is a shared right of the accused and the public, the common concern being the assurance of fairness."].)

Even when a litigant has used a pseudonym (or as Jane Doe has here, repeatedly revealed her true identity while using a pseudonym), the public still has a right to observe the administration of justice. Transparency holds judges, lawyers, and jurors accountable, and Doe's counsel should not be permitted to "sanitize" Olson's

previous judicial vindication out of existence, so Olson gets no response at all to Doe's narrative as adopted and fashioned by the amici.

CONCLUSION

Olson should be allowed to advocate in response to the amici. When he is labeled a "sexual abuser" in public court documents based on Doe's mere "say-so" then adopted by amici, he should at least be able to respond by pointing out the existence of public, adjudicatory proof that Doe's accusations have proven untrue.

After all, it is Doe who directly attacked Olson's "alibi" in her reply brief to this Court. (RBM 39, fn. 8.)

Doe should not have a stranglehold on both the narrative, the public record and concerns, and the advocacy of all the parties. Olson's response to the amici supported by court records should not be stricken. Doe's motion in that regard should be denied.

Respectfully submitted,

BUCHALTER
A PROFESSIONAL LAW CORPORATION

April 21, 2021 By: /s/ *Robert C. Little*

ERIC MICHAEL KENNEDY, ESQ.
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Attorneys for Defendant,
Cross-Complainant and Appellant
CURTIS OLSON

CERTIFICATE OF COMPLIANCE

(CAL. RULES OF COURT, rule 8.520(c))

I, the undersigned appellate counsel, certify this motion consists of 824 words, exclusive of the portions specified in California Rules of Court, rule 8.520(c)(1), relying on the word count of the Microsoft Word program used to prepare it.

Respectfully submitted,

April 21, 2021 By: /s/ *Robert C. Little*

Robert Collings Little, Esq.
BUCHALTER
A PROFESSIONAL LAW CORPORATION
Los Angeles, California

Attorneys for Defendant, Cross-Complainant, and Appellant
CURTIS OLSON

DECLARATION OF ERIC KENNEDY

I, Eric M. Kennedy, declare:

1. I am an attorney at law duly licensed to practice law in the State of California. I am a partner of the law firm of Buchalter, A Professional Corporation, counsel of record for Defendant, Cross-Complainant, and Appellant Curtis Olson in this action. I make this declaration in support of my Client's Curtis Olson's Opposition to Doe's "Cross-Motion" to Strike Olson's Consolidated Answer to Multiple Amicus Curiae Briefs, and for no other purpose. I know of the facts stated in this declaration and, if called upon as a witness, I could and would competently testify thereto

2. For purposes of foundation, the document attached hereto as Exhibit A is a true and correct copy of "Defendant [Doe]'s Reply Demurrer of First Amended Complaint and Declaration of [Doe] In Support Thereof" served on me in the ordinary course of my legal representation in *Curtis Olson vs. [Jane Doe]*, Los Angeles County Superior Court Case Number ▒▒▒▒▒▒▒6503. This is one of numerous court records I have received during my representation of Mr. Olson in which "Jane Doe" publicly discloses her true identity in connection with this Supreme Court case.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 21st day of April 2021, at Los Angeles, in the County of Los Angeles, State of California.

By: s/ *Eric M. Kennedy*
Eric Kennedy

EXHIBIT A

[redacted]
9461 Charleville Blvd #[redacted]
Beverly Hills, CA 90212
[redacted]
in *sui juris*

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES – CENTRAL DISTRICT

CURTIS OLSON,

Plaintiff,

vs.

[redacted] et al.

Defendants.

Case No. [redacted]6503
Hon. Teresa A. Beaudet

DEFENDANT AARONOFF'S REPLY DEMURRER OF FIRST AMENDED COMPLAINT AND DECLARATION OF [redacted] IN SUPPORT THEREOF.

Date: Oct 28, 2020

Time: 10:00 a.m.

Dept: 50

RESERVATION ID: [redacted]3716

TO THE COURT, ALL INTERESTED PARTIES AND THEIR ATTORNEYS OF RECORD:

Defendant [redacted] ("Defendant") hereby replies to Plaintiff's Opposition to her demurrer.

1. Defendant's Timely Demurrer: Defendant in good faith timely emailed a "Meet and Confer" before the deadline and fulfilled the requirements per code 430.41(a) (2), as explained in her earlier filed declaration with her motion and as Kennedy even admitted on page 2 of Olson's Opposition. Disingenuously and misleading Kennedy tries to confuse the Court by referring to "business days" the

code is not by business or court days, but by calendar days, and Kennedy simply missed responding timely, therefore Defendant is entitled to an extra 30 days to file her demurrer.

Further, another grossly misleading statement, Kennedy points to the Court's docket posted filing date of Defendant's demurrer which is not the same as the original filing and service date of September 16, 2020. Kennedy was served timely on September 16, 2020, before the September 18, 2020 deadline as shown on the proof of service and an email from the e-filing company (See Declaration of [redacted] **Ex. A).** The fact that glitches happen with the e-filing service did not in any way prejudice Kennedy because he received Defendant's Notice of Demurrer and Demurrer on September 16, 2020 and as a precaution Defendant emailed another courtesy copy to Kennedy on September 16, 2020, which he acknowledged by email on September 17, 2020. (See Decl. of Aaronoff **Ex. B).**

2. Res Judicata: Kennedy again grossly confuses the issues. Again, Defendant is not and never has been the "alter ego" of ATW Trust. Defendant is certainly not conceding such in this demurrer or anywhere else for that matter. Defendant's point is that Judge Spear **abandoned** her alter ego determination, which she initially granted unlawfully by ***ex parte*** on November 6, 2019 (A notice motion is required. See: *Danko v O'Reilly* A138784 (Dec. 22 2014) Cal. App 4th) and ATW Trust required due process *i.e.* to be properly served, which it was not. (See: *Wells Fargo, NA* 227 Cal. App at 6: *Mad Dog Athletics v NYC Holdings* 565 F. Supp. 2d 1127, 1130 (CD cal. 2008,) A court may add a judgment debtor but it must still effectuate proper service and establish that the court has the requisite jurisdiction over the judgment debtor to be.)

Judge Spear later conceded that she did not have enough information and facts to actually make that November 6, 2019 "alter ego" determination. From July 2019 until about February 15, 2020, Spear continually ordered Nonparty ATW Trust to submit their Trust documents to her under seal. On December 11, 2019, Judge Spear stated: page 14, lines 13-14 "The Court did order that the Trust

Documents be turned over. I believe the original order was in July." (See **Ex C** [redacted] Decl.) And page 16 line 15 "I want to see those documents turned over." Continuing Spear demanded the Trust documents and put pressure on the Trust by sanctions, stating: page 16 "The Court is going to set a OSC for production of documents and an OSC for sanctions for the Trust, in the amount of $5000, for 30 days from today's date…[January 15, 2020]" (See Decl. [redacted] **Ex D)**.

But the million dollar question, WHY did the Honorable Judge Spear want Trust Documents, for what reason did she need them? Spear already made the slam-dunk no due process *ex parte* alter ego determination on Nov 6, 2019, So Why the desperate need for Trust Documents?

The Answer: On December 11, 2019, Judge Spear admitted she needed the Trust Documents to support her earlier alter ego determination, stating, page14: " It's a catch-22, because if you are, in fact, a beneficiary or a trustee of the trust, in that case it is ---we do have subject matter jurisdiction. However, without the documents, **I can not make a ruling one way or the other."** (See Decl. [redacted] **Ex C)**.

On January 15, 2020, Judge Spear did not receive any Trust document under seal because ATW Trust, specially appearing contended that they never voluntarily entered the case by any motion or response and that the Court did not have personal or subject matter jurisdiction over them because they were never served. Therefore they were not required to turn over any documents under seal and furthermore because people involved with the Trust had passed away, they were unable to locate any documents at that time. Shortly thereafter, Spear had unauthorized and unlawful ex parte communications with Kennedy notifying him, that she did not receive certain desired Trust documents under seal.

Further, on October 7, 2020, Kennedy in front of Weingart admitted that he never personally served any trustee but only mailed Mr. Arroliga after-the-fact the November 6, 2019 "alter ego" determination. Attorney Sobel questioned the legitimacy of this mail service: "Mail Service is adequate on a nonparty?" (See Decl. [redacted] **Ex E)**. Kennedy made a completely nonsense excuse and lied that he

should not have to bother with service of process on any trustee, stating "Where we are forced to chase after trustees…." (See Decl. [redacted] **Ex F**). However Kennedy had Mr. Arroliga's name, number, address and email. Kennedy continued to stumble over his lies stating: page 16 "There is no distinction here. The idea that Ms. [redacted] and the Trust are separate is --is –is inaccurate,...its all one and the same. It's service on Ms. [redacted] a service on the Trust." (See Decl. [redacted] **Ex. F)** Thus everyone else in California is forced to follow due process laws to serve people. Defendant spent almost a year trying to serve Mr. Olson and his cronies, constantly asking for extensions of time and hiring PIs to track down people, but when it comes to rich white priviledge, all bets are off and due process is out the window.

Although, Kennedy made this excuse, it is not inline with Spear's other statements on Dec. 11, 2019, pages 13, 15 "You [Defendant [redacted] had absolutely no standing to make any objections on their [Nonparty ATW Trust] behalf," and "You [Defendant [redacted] are not a Trustee, therefore you don't have Jurisdiction to make an objection."(See Decl. [redacted] **Ex G)** Spear made it clear that since [redacted] was not associated with the Trust, she was allowed to act in any way on behalf of the Trust.

Thus on February 28, 2020, Spear, with no Trust documents changed her "alter ego" determination ruling and this intent is proved by the fact that she moved monies owed to Olson off of the ATW Trust and put them solely onto Defendant [redacted] If Judge Spear had meant to keep the alter ego determination ruling intact there would have been no reason to switch monies owned from ATW Trust onto [redacted] because [redacted] and the ATW Trust were supposedly one and the same. Thus there is no longer any alter ego determination. None of Defendant's appeals challenge **the lack** of alter ego determination. Olson failed to appeal the loss of alter ego status, thus for all purposes loss of alter ego status is done, res judicata.

Further, supporting Defendant's res judicata is that while waiting for this demurrer to be heard, it has been discovered that Kennedy has been unethically hiding, since March 10, 2020, the fact that Olson's

original unlawfully granted November 6, 2019 alter ego determination (that was subsequently abandoned on February 28, 2020) was faulty and thus the writ of execution was rejected as unenforceable, so no California Sheriff can or will serve it (Divine Justice). Kennedy attempted to "quick fix" it by another unlawful *ex parte* application on September 24, 2020, but thankfully Judge Weingart was brave enough to follow the law and denied Olson's *ex parte* leaving Olson with an unenforceable alter ego writ of execution.

Therefore, by both the final res judicata ruling of Spear on February 28, 2020, and again on September 24, 2020, by Weingart's denial of Olson's attempt to correct his rejected alter ego's writ of execution, Olson does not have an enforceable judgment to base this "fraudulent transfer" lawsuit on. Olson's entire lawsuit is predicated on the lie that Defendant was the alter ego of ATW Trust, this lie is now moot. Thus Defendants and the Court now know that Olson has been barred from enforcement of any collections against ATW Trust because he has an unenforceable judgment. The waste of this Court's time and resources, and that of all the Defendants and their counsels, is inexcusable. This calls for granting Defendant's demurrer and dismissal of Olson's entire action at once with prejudice.

3. Introduction and Statement of Facts: To set the record straight, Olson's attorney Eric Kennedy's Introduction and Statement of Facts misleads this Court about the underlying restraining order case ([redacted] *v Olson* [redacted]0308) ("Underlying Case") First, Defendant's claims in the Underlying Case were limited to unlawful actions of Olson using third parties to stalk/harass Defendant. Similarly, Olson's claims were that Defendant had used third parties to intimidate Olson. Presiding Judge Convey combined the two cases into one, and stated that Defendant had proved stalking.

Further, Defendant sought and received a mediated restraining order in 2015 against Olson in which he was required to stay away from her for three years for actions, which included but not limited to sexual assault and child pornography.

Next, in the Underlying Case, Olson also ***lost*** his restraining order claims after the four day hearing. Both parties lost their respective cases; so neither one was the prevailing party. Yet, Judge Convey in a radical departure from the law made them both prevailing parties. (See *de la Cuesta*, *supra*, 193 Cal.App.4th at pp. 1287, 1295, 1296; and *McKenzie v. Ford Motor Co.* (2015) 238 Cal. App. 4th 69 704.)

Thus only because Olson could afford Kennedy's outrageous Big Law fees (about $152,000), which were adjusted against Defendant's relatively small attorney's fees award, Olson was awarded the difference about $80,000. However, by this reasoning, if Defendant was a billionaire, she could have billed $1 million dollars ($1,000,000) in attorney's fees. Then Olson would have had to pay Defendant the difference. Is that justice? Whoever has the biggest wad of money to dish out gets the attorney's fees award –really that's our justice system? When Defendant called out Convey for siding with white priviledge, he doubled down noting that Olson had the right to choose the attorney he wants— but a pauper does not get that same luxury and therein lays the white priviledge inequity. A white supremacist attitude destroys society's faith in the justice system.

Realize, "old boys club" Olson is from a white priviledge family of wealth, and a purported billionaire, who owns **multiple luxury homes, each worth millions and numerous expensive cars *and*** *i*s essentially being awarded attorney's fees for being Uber rich against an indigent Native American, minority woman, who has never owned any real estate, doesn't own a car because she can't afford one, has never had a credit card because she can't qualify for one, cannot afford to buy new clothes, yet she is supposedly rich, because only Kennedy purports she is the "alter ego" of a ATW Trust, a modest nonprofit that has only one real property asset, a 966 square foot one bedroom condo (worth an estimated $591,200 by Realtor.com, July 2020.) (See Decl. [redacted] **Ex. H)**

This is clearly unjust not to mention the law is very clear that there cannot be two prevailing parties. But because Olson is rich, even though he technically was not the prevailing party, Convey essential made him a "de facto" prevailing party by giving him the difference of Kennedy's attorney's fees on April 17, 2019. And at that point in time there was No "alter ego" determination whatsoever, so how could Convey have given Olson an excess $80,000 attorney's fees award against Defendant, a fee waiver litigant? Doesn't something seem really wrong here? This attorneys' fees award injustice is on appeal.

Curiously, a pattern has been emerging where some of the various judges in Defendant's related cases don't appear to care about the law. Another example, the Court of Appeal judges didn't mind violating state law by destroying Defendant's day in court, which brave judge John K. Mitchell called out in his amicus letter to the California Supreme Court. (See Decl. [redacted], **Ex. I).** The lawless of the situation has been pushed to the absolute absurdity, similar to the Jeffrey Epstein case, as pointed out by another amicus letter in support of Defendant's granted California Supreme Court case (*Doe v Olson* Case No. S258498):

"Federal district judge Kenneth A Marra of the Southern District of Florida ruled this year that prosecutors had violated the law in the Jeffrey Epstein case by approving a non-prosecution deal with Epstein back in 2007. Epstein's case has been held up as a prime example of how insulted powerful men can escape accountability. This kind of injustice occurred with [Defendant] when Olson persuaded the Court of Appeal to violate California state law (including but not limited to 527.6(w) of the Code of Civil Procedure), robbing her of her opportunity to hold him accountable." (See Decl. [redacted] **Ex. J)**

Hopefully the California Supreme Court will reverse the Court of Appeal's "no rights for minority women of color" ruling back to the lawful ruling of brave Judge Karlan, who dared to go against white super-power Olson; where Judge Karlan granted Defendant's anti-SLAPP and right to redress her

grievances in a court of law, then she will have an opportunity ***in front of a jury*** to prove her claims, until then Kennedy's accusations that Defendant has no evidence is yet to be seen.

4. An Automatic Stay per 917.1(d) without an undertaking is the law for attorney's fees only awards. Defendant will seek justice with the higher courts, if necessary. Further, as stated above, Kennedy wants to confuse this Court that there was a lawful "alter ego" determination ruling by Judge Spear, left in place, it was abandoned. Defendant is indigent and is not the alter ego of ATW Trust and therefore she does not have any legal rights to use ATW Trust to finance her own undertaking bond, and she has absolutely no financial means to afford an undertaking of any amount.

Finally, all the related cases between Olson and Defendant are a very sad and horrific situation because Defendant and Olson easily could have settled this matter years ago from the get-go, but for the fact that Olson hired Kennedy, who interfered with settlement discussions in favor of his wild litigation schemes to bilk his client and literally take advantage of the situation for his own financial gain. Unethically, Kennedy has recklessly litigated the heck out of all these related cases and he is the only one to blame for the high attorney's fees. And for the Court's information, the top law firm Sidley Austin (*U.S. News* Survey named Sidley the "Law Firm of the Year" 2020) took Defendant's Supreme Court case pro bono after carefully vetting her and independently determining that she was not the alter ego of ATW Trust. In reviewing Defendant's various cases with Olson, an attorney explained all the ways that Kennedy had committed malpractice against Olson. In light of this, Olson should sue Kennedy for malpractice. Kennedy's out-of-control litigation schemes are abusive to his client, all the Defendants and the courts and Defendant should not be held responsible for them.

5. Olson's fraud allegations are insufficient. Olson's fraud allegations are fully dependent upon a valid and enforceable alter ego status, between Defendants [redacted] and ATW Trust. Since Olson does not have that, he cannot sustain a single fraud allegation.

CONCLUSION

For all these reasons and in particular that Olson's lawsuit is both barred res judicata and stands upon an unenforceable judgment, Defendant humbly requests the Court should grant Defendant's timely filed demurrer and dismiss Olson's lawsuit with prejudice.

DATED October 21, 2020

By: [redacted]

[redacted] *sui juris*

DECLARATION OF [redacted]

[redacted] declares:

The following facts are within my personal knowledge. If called as a witness, I could and would competently testify thereto.

1. In good faith I timely emailed a "Meet and Confer" before the deadline and fulfilled the requirements per code 430.41(a) (2), as explained in my earlier filed declaration. I am entitled to an extra 30 days to file my demurrer.

2. My process server, Titus Fotso did the e-filing as per the proof of service. The e-filing service provider Rapid Legal sent me an email verification on September 16, 2020, of the demurrer filing and service upon Kennedy (See a true and correct copy of email verification from Rapid legal as **Ex. A).** Because the Court had moved around hearing dates the e-service filing had glitches in accepting the initial filed demurrer. However, this did not in any way prejudice Kennedy because he received my Notice of Demurrer and Demurrer on September 16, 2020 and as a precaution I emailed another courtesy copy to Kennedy on September 17, 2020, which he acknowledged by email. (See **Ex. B** as a true and correct copy of my email exchange with Kennedy regarding him receiving service of the Demurrer).

3. Again, I am not now nor have I ever been the "alter ego" of ATW Trust and I am certainly not conceding such in this demurrer or anywhere else for that matter. It is reasonable and clear from Judge Spear's words she **abandoned** her alter ego determination in the February 28, 2020 hearing because she conceded that she did not have enough information and facts to actually make the November 6, 2019 "alter ego" determination. **(Ex. C, D** are true and correct copies of transcript pages from Dec 11, 2019).

4. I was informed and believe on January 15, 2020, Judge Spear did not receive any Trust document under seal because ATW Trust, who specially appeared contended that they never voluntarily entered the case by any motion or response and that the Court did not have personal or subject matter

jurisdiction over them because they were never served. I knew several people involved with the Trust had passed away.

5. Kennedy admitted to me that he had ex parte communications with someone in the Court that informed him, what was in and not in the documents of ATW Trust's envelope submitted under seal to Judge Spear. Shocked, I attempted to question Kennedy, realizing he let the cat out of the bag, he hung up on me. I went to the courthouse and asked the clerk Kim and other staff members if any of them had seen the contents of the Trust's envelope and/or if they had informed Kennedy about them. Everyone told me that the ONLY person that had any access to the Trust's documents submitted under seal was Judge Spear.

6. **(Ex. E and F** are true and correct copies of transcript pages from Oct. 7, 2020).

7. **(Ex. G** is a true and correct copy of transcript page from Dec 11, 2019).

8. None of my appeals challenge the lack of alter ego determination.

Introduction and statement of facts

9. I filed a restraining order against Curtis Olson in 2017-18, [redacted] *v Olson* case no 1[redacted]0308 that was limited to Olson's unlawful actions of using third parties to stalk and harass me. Similarly, Olson filed a TRO against me for the one time even of being served my TRO papers, claiming he was intimidated by my process server.

10. I sought and received a mediated restraining order in 2015 against Olson in which he was required to stay away from me for three years for actions, which included but not limited to sexual assault and child pornography.

11. In the Underlying Case, Olson also ***lost*** his restraining order claims after the four day hearing. Both Olson and I lost our respective cases; so neither one of us was the prevailing party. Yet, upon legal counsel from a Harvard attorney, Judge Convey made a radical departure from the law, because the law does not allow for two prevailing parties and then to pick favorites based on race and money-this is

very unethical! Only because Olson could afford Kennedy's outrageous Big Law fees (about $152,000), which were adjusted against my relatively small attorney's fees award, Olson was awarded the difference about $80,000. However, by this reasoning, if I were a billionaire, I could have billed $1 million dollars in attorney's fees. Then Olson would have had to pay me the difference. Is that justice? When I called out Convey for siding with white priviledge, he doubled down noting that Olson had the right to choose the attorney he wants— but since I am a pauper, I do not get that same luxury and therein lays the white priviledge inequity.

12. Olson himself told me he was part of an "old boys club." And upon research and belief, Olson is from a white priviledge family of wealth, and various people close to him have told me he is a billionaire. I have personally seen some of Olson's luxury multimillion-dollar homes and his various expensive cars and his vintage collector's jaguar. Olson's employees and other people who know him have told me about his other luxury homes and real estate that he owns.

13. I am indigent, Native American, mixed race minority woman, who has never owned any real estate. I do not own a car because I can't afford one. I have never been able to obtain a credit card because I can't qualify for one. I cannot afford to buy new clothes. I have no secret wealth.

14. I am not and never have been the alter ego of ATW Trust, which regards a real property in question that according to website Realtor.com, July 2020 is a 966 square foot one bedroom condo, located in Westwood California, worth an estimated $591,200. **Ex. H**).

15. On April 17, 2019, Judge Convey had no facts or documents upon which to make an alter ego determination. Convey did not make an alter ego determination. However, to the contrary, Convey had the property chain of title, provided by Kennedy that clearly proved, that I was not an owner of the Trust's condo in question. Therefore, Convey had no reasonable or equitable law upon which to award Olson an excess $80,000 attorney's fees award against me. Further, it has been determined by Stanley Mosk

Courthouse that I qualify for a fee waiver. It is my understanding that Family court foregoes a jury and as part of the history of such common law courts, they are supposed to function as "courts of equity" to the fairness of all litigants. I pray another judge will be brave enough to correct this injustice.

16. I have been witnessing a pattern, not just in my case, but in countless cases across America of a total break down of justice in our legal system and the Family courts appear to be the worst. Shockingly, the Court of Appeal judges were very hostile to me and didn't appear to mind violating state law by destroying my "day in court." Thankfully, there are still brave judges like John K. Mitchell, who was so distraught at the injustice of what happened to me, he immediately, without hesitation, fired off this amicus letter to the California Supreme Court, **Exhibit I** is a true and correct copy of Mitchell's amicus letter. And **Exhibit J** is a true and correct copy of amicus letter from Dr. Arlene Drake.

17. I am very grateful and honored that the California Supreme Court judges against all odds unanimously agreed to review my case, because the Court of Appeal judges buried it in an unpublished opinion.

18. The reason I believe Judge Karlan is brave. Shortly after Olson hired Kennedy, he filed a cross-complaint to throw out my original civil lawsuit for damages from all the atrocities I have suffered at the hands of Olson and his co-conspirator. Then Kennedy filed an *ex parte* application to just throw my case out in June 2017. In the court hallway while waiting, Kennedy strangely looked at me cross-eyed and boasted that he was definitely throwing my case out. He continued on basically indicating that he and/or through Olson's power had somehow conspired with Judge Karlan, or something that he had possibly intimidated or blackmailed Karlan. It was very strange. Kennedy carried on that this was a "*done deal*, as soon as the hearing started it would be over for my case," he gloated. Perhaps, Kennedy was attempted to scare me, trying to give me the impression that they could bribe judges. This was very frightening to me because earlier, Olson's wife told me, if I dared to sue Mr. Olson I would never win because he can buy

judges. Then later when I read a US News story that Olson's company's top employee, Richard Meaney, was arrested by the FBI and indicted on bribing a politician, I felt very nauseous.

19. But something unexpected happened, Judge Karlan said, This is a "Court of Law," and then he kindly just asked me to explain my case. I requested the chance to do an anti-SLAPP. Unbeknownst to me, Karlan is an expert on anti-SLAPP and teaches it at law school, he saw some merit in my request and granted it and denied Olson's *ex parte* to toss my case. But then something really unexpected happened Kennedy got unprofessionally outraged, he disrespected the Judge acting as if the Judge needed to obey him! Kennedy would not accept the denial of his *ex parte*. Finally, at one point, Judge Karlan just demanded Kennedy to get out of his courtroom.

20. I have no control over the Trust because I am not the alter ego of ATW Trust. Further, I stepped down from the Trust's Board of trustees before the attorney's fees hearing in April 2019. Thus, I have no legal rights to sign on behalf or use ATW Trust to finance my own undertaking bond for Olson's attorney's fees award. If I was still on the Board of trustees, I would not be allowed to use the Trust's assets for my own legal bills. I have absolutely no financial means to afford an undertaking of any amount.

21. Kennedy is to blame for the current state of this very sad and horrific situation because I believe, Olson and I easily could have settled this matter years ago from the get-go. I am not an attorney, I have no benefit to do all this litigating, it's a waste of my life. There were initially other people, before Kennedy got involved that were helping a settlement. I reasonably believe, Kennedy saw Olson as a cash cow, interfered with our settlement discussions in favor of his wild litigation schemes to bilk Olson and take advantage of the situation for his own financial gain.

22. Sidley Austin is representing me in my California Supreme Court case, *Doe v Olson* Case No. S258498, pro bono, after carefully vetting me and independently determining that I am not the

alter ego of ATW Trust. An attorney working on my case explained to me all the ways that Kennedy had committed malpractice against Olson.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed October 21, 2020 at Los Angeles, California.

[redacted]

EXHIBIT A

EXHIBIT A

From: donotreply@legalconnect.com,
To: janedoe4justice@aol.com,
Subject: eService Notice for CURTIS R. OLSON vs [redacted] et al.; 19STCV46503
Date: Wed, Sep 16, 2020 10:01 pm

---

eService Delivery Notification

This electronic message is to notify you pursuant to C.C.P. 1010(6) and CA Rules of Court 2.251 on behalf of

The following document(s) are being served:

Demurrer - without Motion to Strike
[Proposed Order] and Stipulation to Continue Trial, FSC (and Related Motion/Discovery Dates)
Personal Injury Courts Only (Central District)

To retrieve documents, please click this link: eService Notification.

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Thank you for using Rapid Legal.

Order(s): **3855168-02**

Billing Code: **001**

EXHIBIT B

EXHIBIT B

From: ekennedy@buchalter.com,
To: janedoe4justice@aol.com,
Cc: gscottsobel@gmail.com, mreyes@porterscott.com, ctapp@porterscott.com, jherman@porterscott.com, amilnes@buchalter.com,
Subject: RE: Demurrers FAC Olson v [redacted] 19STCV46503
Date: Thu, Sep 17, 2020 8:26 am

Buchalter

Eric Kennedy
Shareholder
T (213) 891-5051
C (310) 905-4500
ekennedy@buchalter.com

1000 Wilshire Boulevard, Suite 1500
Los Angeles, CA 90017-1730
www.buchalter.com | Bio

From: Jane Doe [mailto:janedoe4justice@aol.com]
Sent: Wednesday, September 16, 2020 10:10 PM
To: Kennedy, Eric <ekennedy@buchalter.com>; jherman@porterscott.com; ctapp@porterscott.com; mreyes@porterscott.com; gscottsobel@gmail.com
Subject: Demurrers FAC Olson v [redacted] 19STCV46503

Attached see documents:

Demurrers FAC Olson v [redacted] 19STCV46503

Proposed Order Demurrers FAC

EXHIBIT C & D

EXHIBIT C & D

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

DEPARTMENT NO. 65 HON. EMILY T. SPEAR, JUDGE

IN RE THE MATTER OF:

[redacted]

PETITIONER,

VS.

CURTIS OLSON,

RESPONDENT.

NO. [redacted]0308

REPORTER'S TRANSCRIPT OF PROCEEDINGS

DECEMBER 11, 2019

APPEARANCES:

FOR THE PETITIONER: [redacted]
IN PROPRIA PERSONA

FOR THE RESPONDENT: BUCHALTER LAW FIRM
BY: ASHLEY L. MILNES
ATTORNEY AT LAW
1000 WILSHIRE BOULEVARD
SUITE 1500
LOS ANGELES, CA 90017
(213) 891-0700

DEBRA RIVERA, C.S.R. 10785
OFFICIAL COURT REPORTER

THEN, WHEN I SPOKE TO AN ATTORNEY, I SAID, THERE'S NO SUBJECT MATTER JURISDICTION. YOU CAN'T -- THERE'S THIS -- THE OUTRAGE. YOU CAN'T JUST BRING IN ANOTHER ENTITY. BECAUSE MR. ARROLIGA, HE DOESN'T HAVE A JUDGMENT AGAINST HIM. NEITHER DOES THE NEW MOTHER. AND NEITHER DOES THE OTHER TRUSTEES. AND NEITHER DO THE MEMBERS OF THE BENEFACTOR. NONE OF THEM HAVE A JUDGMENT. SO HOW CAN THESE PEOPLE BE BROUGHT IN?

THE COURT: IT'S A CATCH-22, BECAUSE IF YOU ARE, IN FACT, A BENEFICIARY OR A TRUSTEE OF THE TRUST, IN THAT CASE, IT IS -- WE DO HAVE SUBJECT MATTER JURISDICTION. HOWEVER, WITHOUT THE TRUST DOCUMENTS, I CANNOT MAKE A RULING ONE WAY OR THE OTHER. THE COURT DID ORDER THAT THE TRUST DOCUMENTS BE TURNED OVER. I BELIEVE THE ORIGINAL ORDER WAS IN JULY.

MS. MILNES: WELL --

THE COURT: ONE AT A TIME, PLEASE.

MS. MILNES: WE A SUBPOENAED THEM AT THE END OF JULY, AND THEN WE APPEARED FOR MR. AARONOFF'S DEBTOR EXAM ON SEPTEMBER 4TH, DURING WHICH THE COURT DID ISSUE AN ORDER TO THE REPRESENTATIVE APPEARING AT THE TIME ON BEHALF OF THE TRUST, WHO THEN CLAIMED THAT HE WAS ONLY AN APPEARANCE ATTORNEY.

AND THEN, YOU KNOW, WE GET TO SEPTEMBER 26TH, WHICH WAS THE NEXT HEARING. AND AGAIN, THERE WAS A REQUEST FOR EXTRA TIME, SO THE COURT THEN SAID, YOU KNOW, SET A DEADLINE OF OCTOBER 31ST. LO AND BEHOLD, OCTOBER 31ST, MS. AARONOFF FILES A REQUEST FOR ANOTHER EXTENSION OF TIME. AND, YOU KNOW, I GUESS -- THERE HAS TO BE -- THIS IS JUST

I'M QUITE CERTAIN YOUR THYROID IS NOT IN YOUR LOWER BACK. ONE --

(SIMULTANEOUS SPEAKING INTERRUPTED.)

-- TRUSTEE HAD A BABY RECENTLY. HOWEVER, THAT DOESN'T GO BACK TO SEPTEMBER.

THE THIRD REASON WAS A TRUSTEE IS OUT OF TOWN. IT DOESN'T SAY, "DECEASED." IT JUST SAYS, "OUT OF TOWN." NONE OF THOSE SEEM TO BE A BASIS FOR HAVING DISOBEYED THE COURT ORDER FOR THIS LONG.

THIS COURT IS GOING TO SET AN OSC FOR PRODUCTION OF DOCUMENTS AND AN OSC FOR SANCTIONS FOR THE TRUST, IN THE AMOUNT OF $5,000, FOR 30 DAYS FROM TODAY'S DATE. IF THOSE DOCUMENTS ARE NOT PRODUCED WITHIN 30 DAYS OF TODAY'S DATE, THE TRUST OR ITS REPRESENTATIVES WILL OWE THIS COURT $5,000.

I WANT TO SEE THOSE DOCUMENTS TURNED OVER. IF THERE'S A STAY, GREAT, THEN THIS ALL BECOMES MOOT. BUT IN THE MEANTIME, I DON'T HAVE ANY OF THAT BEFORE ME, AND I CAN'T SPECULATE AS TO WHAT THE APPELLATE COURT IS GOING TO DO.

MA'AM, WITH RESPECT TO YOUR 170.1, AGAIN, IF YOU FIND OUT THE OTHER INFORMATION --

(SIMULTANEOUS SPEAKING INTERRUPTED.)

THE PETITIONER: BUT WHAT ABOUT THE FACT THAT YOU DON'T HAVE ANY SUBJECT MATTER JURISDICTION?

THE COURT: I DON'T KNOW UNTIL I HAVE THE TRUST DOCUMENTS, AND I DON'T HAVE THAT. I KNOW THAT OUT OF HOW MANY TIMES I'VE ORDERED THEM, I WILL GET THEM BACK.

THE PETITIONER: WELL, THE TRUST HAS NEVER BEEN SERVED.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

DEPARTMENT NO. 65 HON. EMILY T. SPEAR, JUDGE

IN RE THE MATTER OF: [redacted] PETITIONER, VS. CURTIS OLSON, RESPONDENT.	NO. [redacted]0308
	REPORTER'S CERTIFICATE

I, DEBRA RIVERA, C.S.R. NO. 10785, OFFICIAL REPORTER OF THE SUPERIOR COURT OF THE STATE OF CALIFORNIA, FOR THE COUNTY OF LOS ANGELES, DO HEREBY CERTIFY THAT THE FOREGOING PAGES 1 THROUGH 19, INCLUSIVE, COMPRISE A FULL, TRUE AND CORRECT TRANSCRIPT OF THE PROCEEDINGS HELD ON DECEMBER 11, 2019, IN THE ABOVE-ENTITLED CAUSE.

DATED THIS 4TH DAY OF FEBRUARY, 2020.

DEBRA RIVERA, C.S.R. 10785
OFFICIAL COURT REPORTER

EXHIBIT E & F

EXHIBIT E & F

CASE NUMBER: [redacted]0308

CASE NAME: [redacted] [redacted] VS.

CURTIS OLSON

LOS ANGELES, CALIFORNIA WEDNESDAY, OCTOBER 7, 2020

DEPARTMENT NO. 81 HON. GREGORY J. WEINGART, JUDGE

REPORTER: DEBRA RIVERA, C.S.R. 10785

TIME: 9:24 A.M.

APPEARANCES: (AS HERETOFORE NOTED.)

(WHEREUPON, THE CLAIMANT/APPELLANT, JOHN WALKOWIAK, APPEARED BY LACOURTCONNECT VIA AUDIO, AND THE PROCEEDINGS WERE AS FOLLOWS:)

THE COURT: ALL RIGHT. NUMBER 1, [redacted] AND OLSON, [redacted]0308.

MR. KENNEDY: GOOD MORNING, YOUR HONOR. ERIC KENNEDY --

THE COURT: WAIT UNTIL WE GET EVERYBODY HERE.

(PAUSE.)

THE COURT: ALL RIGHT. COULD WE HAVE APPEARANCES, STARTING WITH PETITIONER, PLEASE.

MR. SOBEL: YOUR HONOR, I AM SCOTT SOBEL, S-O-B-E-L. FILED NOTICES OF LIMITED SCOPE REPRESENTATION JUST YESTERDAY IN THE AFTERNOON FOR THE PETITIONERS, INCLUDING THE NONPARTY PETITIONERS INVOLVED. I COULD NAME THEM, IF YOU WISH.

THE COURT: SO YOU'RE REPRESENTING FOR PURPOSES OF

CATCH-22, WHERE WE ARE FORCED TO CHASE AFTER THE TRUSTEES, ONLY TO FIND THAT THOSE TRUSTEES HAVE BEEN CHANGED, AFTER WE HAVE GOTTEN WHATEVER RELIEF IT WAS THAT WE SOUGHT FOR, PROVIDED WHATEVER NOTICE WAS REQUIRED. NEXT THING WE KNOW, THERE'S SOMEBODY ELSE NOW WHO ISN'T A TRUSTEE. BEFORE, BUT NOW IS.

AND NOW WE HAVE THIS NEW PERSON ON THE SCENE, WHO IS DEFINED AS A TRUST PROTECTOR, WHO LIVES IN AUSTRALIA. I DON'T KNOW WHAT THAT MEANS. AND THE REALITY IS THAT IT HIGHLIGHTS THE ISSUE THAT JUDGE SPEARS IDENTIFIED, WHICH IS, THERE'S NO DISTINCTION HERE. THE IDEA THAT MS. [redacted] AND THE TRUST ARE SEPARATE IS -- IS -- IS INACCURATE, AND IT PUTS US IN A SITUATION WHERE WE'RE CONSTANTLY CHASING OUR TAILS TRYING TO FIGURE OUT WHO GETS SERVED WITH WHAT, WHO, AND WHERE. IT'S THAT'S WHY JUDGE SPEARS SAYS IT'S A SHAM. IT'S ALL ONE IN THE SAME. IT'S A SERVICE ON MS. [redacted], A SERVICE ON THE TRUST, A SERVICE ON WHOEVER NEEDS TO BE SERVED.

SO IT WAS A CLERICAL ISSUE THAT THE SHERIFF IDENTIFIED. SO WE SAID, "OKAY. NO PROBLEM." WE'RE NOT GOING TO CHANGE THE FACT THAT THE ORDER WAS ISSUED. WE'RE JUST GOING TO ADJUST THE JUDGMENT. THE JUDGMENT WAS INTENTIONALLY OVERBROAD TO ACCOUNT FOR THIS EXACT ISSUE. THE JUDGMENT SAID ALL TRUSTEES OF THE ATW TRUST, WHOMEVER THEY MIGHT BE, BECAUSE WE PREDICTED ACCURATELY THAT THAT TRUSTEE WAS GOING TO CHANGE WHENEVER IT WAS NEEDED. AND THE SHERIFFS SAID YOU CAN'T DO THAT.

THE COURT: I UNDERSTAND YOUR ARGUMENT, BUT IF THEY GOT NOTICE AFTERWARDS, WHY -- THEY COULD HAVE BEEN MOVED IN A TIMELY FASHION FOR RECONSIDERATION --

MR. SOBEL: WELL --

THE COURT: -- SAYING THAT THEY DIDN'T GET NOTICE, SO WHY DID THEY WAIT SO LONG?

MR. SOBEL: MAY I -- MAY I -- MAY I -- MAY I CONFER WITH MY CLIENT? BECAUSE SHE FEELS SHE NEEDS TO BE HEARD.

THE COURT: SURE.

(THE PETITIONER AND COUNSEL CONFER.)

MR. SOBEL: IS THE COURT FINDING THAT -- THAT SERVICE BY MAIL IS PROPER NOTICE ON A -- ON AN UNAFFILIATED PARTY WITH THE CASE? BECAUSE THEY DIDN'T RECEIVE PERSONAL SERVICE OR ANY -- ANY OTHER SERVICE THAN A MAIL SERVICE.

THE COURT: I'M SAYING THAT THEY WERE PUT ON NOTICE. THAT'S WHAT I'M SAYING.

MR. SOBEL: WELL, THAT -- OKAY. SO -- SO -- SO MAIL SERVICE IS ADEQUATE ON A NONPARTY?

THE COURT: I UNDERSTAND YOUR ARGUMENT THAT THAT'S INSUFFICIENT. I UNDERSTAND THE POINT YOU'RE MAKING. GO AHEAD.

MR. SOBEL: OKAY. ALL RIGHT. SECOND POINT. IS NOT THE FEBRUARY 28TH, 2020, FINDINGS BY JUDGE SPEAR (SIC) INCONSISTENT WITH HER JUDGMENT OF NOVEMBER 16TH?

THE COURT: BUT, AGAIN, WHY THE DELAY IN -- IN RAISING THAT ISSUE UNTIL NOW?

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

DEPARTMENT NO. 81 HON. GREGORY J. WEINGART, JUDGE

IN RE THE MATTER OF: [redacted] PETITIONER, VS. CURTIS OLSON, RESPONDENT.	NO. [redacted]0308
	REPORTER'S CERTIFICATE

I, DEBRA RIVERA, C.S.R. NO. 10785, OFFICIAL REPORTER OF THE SUPERIOR COURT OF THE STATE OF CALIFORNIA, FOR THE COUNTY OF LOS ANGELES, DO HEREBY CERTIFY THAT THE FOREGOING PAGES 1 THROUGH 20, INCLUSIVE, COMPRISE A FULL, TRUE AND CORRECT TRANSCRIPT OF THE PROCEEDINGS HELD ON OCTOBER 7, 2020, IN THE ABOVE-ENTITLED CAUSE.

DATED THIS 19TH DAY OF OCTOBER, 2020.

DEBRA RIVERA, C.S.R. 10785
OFFICIAL COURT REPORTER

EXHIBIT G

EXHIBIT G

TIME.

AND THE OTHER TRUSTEE, WHO JUST HAD A BABY, SHE'S BEEN QUARANTINED BECAUSE -- LIKE, YOU KNOW, I WANTED TO GO VISIT HER, AND SHE SAID THAT SHE'S NOT ALLOWED TO HAVE ANY VISITORS BECAUSE OF THE DELICATE NATURE OF THE BABY AND HER HEALTH.

AND SO -- AND AS FAR AS THE TRUSTEE THAT PASSED AWAY IN FLORIDA, HIS ESTATE -- WE -- I MEAN, I CAN BRING IN MY PHONE RECORDS. I'VE BEEN CALLING THE FAMILY. I'VE BEEN CALLING THEM. WE'VE ALL BEEN TRYING TO REACH THEM.

THE COURT: MA'AM, YOU HAVE BEEN TELLING ME THAT YOU ARE NOT THE TRUSTEE OF THE ESTATE. SO ALL THIS INFORMATION YOU'RE GIVING ME NEEDS TO COME FROM THE TRUSTEE --

THE PETITIONER: RIGHT.

THE COURT: -- IF YOU ARE, INDEED, NOT A TRUSTEE. IF YOU ARE NOT A TRUSTEE AND YOU DON'T HAVE INVOLVEMENT IN THE TRUST, IN THAT CASE, YOU HAD ABSOLUTELY NO STANDING TO MAKE ANY OBJECTIONS ON THEIR BEHALF.

THE PETITIONER: WELL, I -- FINE, BUT I'M MAKING THE OBJECTION ON MY BEHALF, THAT I CANNOT BE HELD ACCOUNTABLE TO BRING IN THESE TRUST DOCUMENTS FOR THEM. AND I'M JUST GIVING YOU SOME BACKGROUND FROM WHAT THEY'VE TOLD ME.

SO -- AND ANOTHER THING IS THAT WHEN I SPOKE TO AN ATTORNEY, THEY SAID, YOU KNOW, WHEN WE ORIGINALLY TRIED TO FILE THIS, THEY SAID THAT THEY WEREN'T JOINED IN THE CASE, AND THEY WEREN'T ALLOWED TO -- BECAUSE HE, ORIGINALLY, TRIED TO FILE THE DOCUMENT HIMSELF -- MR. ARROLIGA. BUT, THEY SAID HE HAD TO JOIN THE CASE, HE HAD TO PAY FEE. AND

RIDICULOUS. IT'S AN ONGOING CIRCUS.

THE PETITIONER: I'LL JUST SAY ONE MORE THING.

THE COURT: LAST THING.

THE PETITIONER: THE WHOLE THING COULD BE MOOT ONCE WE HAVE THE MOTION TO STAY, BECAUSE BY THAT TIME, I BELIEVE I WILL HAVE A NEW ATTORNEY. THEY WILL AMEND THE MOTION TO STAY.

THE COURT: WHERE ARE YOU FILING THE MOTION TO STAY?

THE PETITIONER: THE MOTION TO STAY IS ALREADY ON CALENDAR FOR FEBRUARY 14, 2020.

THE COURT: ALL RIGHT. THE COURT'S GOING TO MAKE THE FOLLOWING ORDERS:

THE COURT -- I DON'T HAVE JURISDICTION TO STAY THE CASE ONE WAY OR THE OTHER, BECAUSE IT'S NOT IN FRONT ME.

(SIMULTANEOUS SPEAKING INTERRUPTED.)

THE OTHER CASE MAY BE OVERTURNED. THAT MAY VERY WELL BE. BUT AGAIN, I DON'T HAVE THAT CASE EITHER. ALL I HAVE, MA'AM, RIGHT NOW IN FRONT ME IS A MOTION BY A TRUSTEE TO CONTINUE TO GET MORE TIME TO PRODUCE THE TRUST DOCUMENTS. YOU ARE NOT THAT TRUSTEE. THEREFORE, YOU DON'T HAVE JURISDICTION TO MAKE AN OBJECTION. NO TRUSTEE REPRESENTATIVE IS HERE OR AN ATTORNEY ON BEHALF OF THE TRUST, REPRESENTATIVE IS HERE. THEREFORE, THEIR MOTION TO CONTINUE THIS IS NOW MOOT.

THIS COURT HAS ORDERED THIS AT LEAST TWO, IF NOT THREE TIMES, BE TURNED OVER. THE REASONING I GOT WAS THAT THERE'S -- HE HAS A THYROID TUMOR; THAT HE ATTACHED MEDICAL DOCUMENTS REGARDING HIS LOWER BACK. I'M NOT A DOCTOR, BUT

EXHIBIT H

EXHIBIT H

Home Value for [redacted]37 Wilshire Blvd

[redacted]37 Wilshire Blvd is likely to depreciate by 0.5% in the next year, based on the latest home price index. In the last 3 years, this home has decreased its value by 25%.

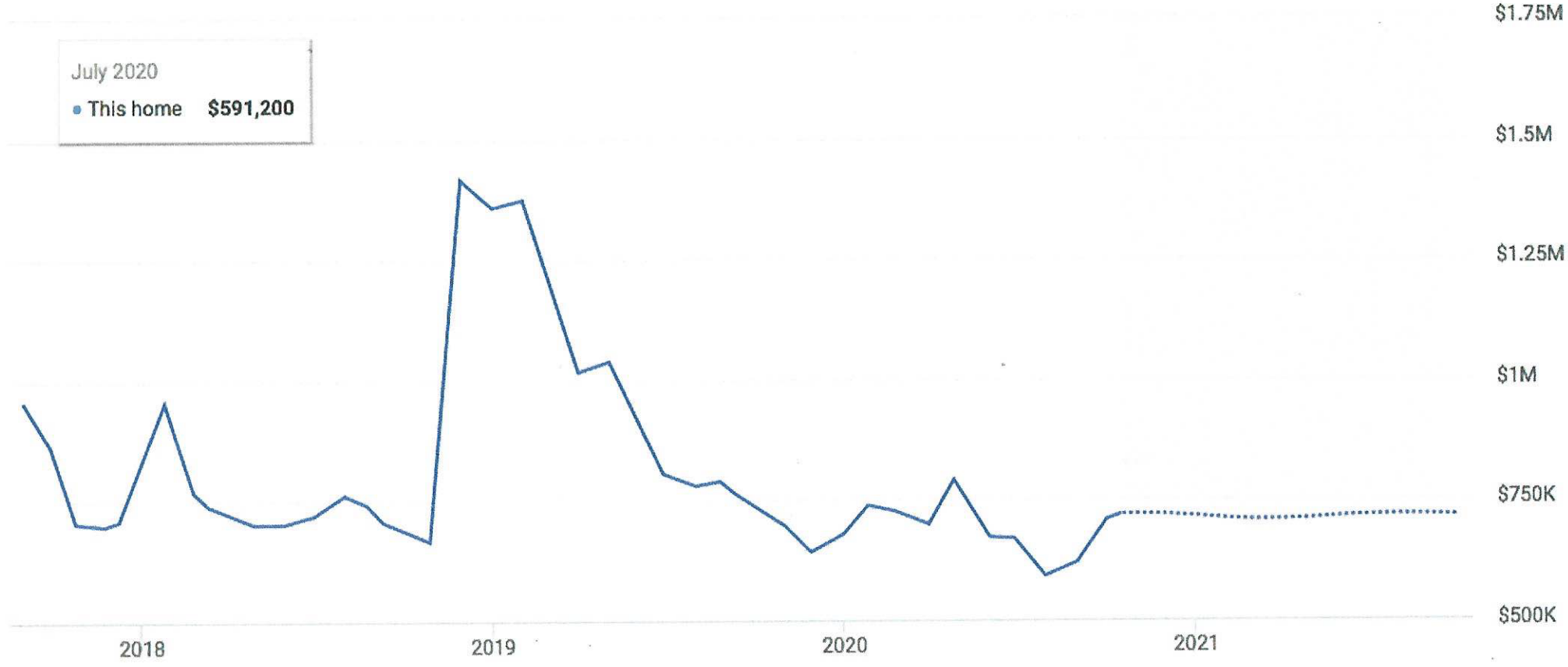

EXHIBIT I

EXHIBIT I

October 17, 2019

Honorable Tani Cantil Sakauye, Chief Justice
Honorable Associate Justices
Supreme Court of California
350 McAllister Street
San Francisco, California 94102

Re: Letter of *Amicus Curiae* John K. Mitchell, Esq. of Trusted Mediators in Support of Petition for Review: *Jane Doe v. Curtis Olson*; Supreme Court of the State of California Case No. S258498

Dear Chief Justice Canti Sakauye and Associate Justices of the Court:

I, John K. Mitchell, Esq. of Trusted Mediators, in Long Beach, California, do hereby submit this letter of support for the Petition Review for Jane Doe in the above captioned case, Jane Doe v. Curtis Olson. In accordance with California Rule of Court 8.500(g)(1), a copy of this letter was served on all parties to the case. (*see* service information below)

As a Trusted Mediator, a judge pro tem for Los Angeles Superior Courts (certified to hear civil harassment cases) and a law school lecturer in mediation (USC Gould School of Law), I urge this Court to grant the Petition for Review because the Court of Appeal decision violates state law and works against civil harassment victim's litigation privilege, California Code of Civil Procedure Section 527.6(w).

Furthermore, as a regular volunteer mediator for civil harassment cases in the court, mediators are trained to explain to litigants that damages must be pursued in other court actions because a civil harassment court does not have jurisdiction over damage claims. Directing victims to pursue their civil remedies helps mediators close cases that would otherwise drain court resources to litigate these cases. To take away a victim's day in court from a misinterpretation of a mutual "Stay Away" agreement is an injustice that requires review. I urge support for the Petition Review of Jane Doe v. Curtis Olson.

Respectfully submitted,

John K. Mitchell, Esq.
400 Oceangate, 8th Floor
Long Beach, California 90802
john.mitchell16@ca.rr.com
(323) 293-3012

EXHIBIT J

EXHIBIT J

October 22, 2019

Honorable Tani Cantil Sakauye, Chief Justice
Honorable Associate Justices
Supreme Court of California
350 McAllister Street
San Francisco, California 94102

Re: Letter of *Amicus Curiae* from Mental Health Professionals and Organizations in Support of Petition for Review: *Jane Doe v. Curtis Olson*; Supreme Court of the State of California Case No. S258498

Dear Chief Justice Canti Sakauye and Associate Justices of the Court:

We write on behalf of a coalition of mental health professionals and organizations, some of whom have signed below, including Dr. Arlene Drake, PhD., a renowned psychotherapist with over 30 years experience and a pioneer in the field of trauma recovery. We submit this joint *amicus curiae* letter in support of the Petition for Review for Jane Doe in the above captioned case, *Jane Doe v. Curtis Olson.* In accordance with California Rule of Court 8.500(g)(1), a copy of this letter was served on all parties to the case.

Together, we strongly urge this Court to grant the Petition for Review, because the Court of Appeal's decision fails to take into account the ramifications of sexual violence trauma upon a victim's mental health. A woman who is the victim of a rape or attempted rape, when forced to face her abuser, followed by threats to her emotional and/or physical wellbeing, is in a state of trauma and under duress. Sexual violence impedes the female brain by secreting hormones (cortisol and adrenaline) that alter the brain chemistry and its normal functions. The releases of such hormones cause the female brain to switch to a fight-or-flight response. In this state, the amygdala disables the frontal lobes (thinking/cognitive lobes). It is a very well known fact that without access to the frontal lobes, a victim cannot think clearly and make rational decisions. These findings are supported by rape trauma syndrome (RTS) and post-traumatic stress disorder (PTSD) research.

Therefore, to ask a lone unrepresented woman, who's undergone the trauma of sexual violence, to enter mediation and sign legal documents, without her having a psychological evaluation performed first, should be outlawed. If such documents were to be signed, they should be found invalid as a matter of law. This is a serious public concern and should be addressed appropriately.

Regarding Jane Doe's case, she provided police reports that she was a victim of sexual assault, battery and harassment perpetrated by Curtis Olson, a male individual, who intimidated Doe with his huge monetary resources and his vast and powerful social network. The court granted Doe a temporary restraining order. Unrepresented and with no psychological evaluation, Doe was directed to mediation. As an alleged sexual violence victim, forced to personally face her abuser, his team of attorneys and their constant threats, Doe felt pressured to sign an agreement, including constrained circumstances detailed in Doe's filed declarations that left her with no other viable options but to sign the agreement. In this situation, Doe could have been in a state of trauma and under duress prior to entering mediation. The practice of ushering unrepresented victims of sexual violence into mediation to sign agreements for the convenience of overloaded courtrooms is not an equitable practice.

There was no reported psychological evaluation performed for the Court of Appeal to review and make an assessment and conclusion regarding Jane Doe's mental state to voluntarily enter mediation or sign an agreement. Whereas, the evidence of sexual violence trauma per RTS and PTSD is verified and should have been taken into account..

Further, the parties' settlement agreement arose out of a quasi-criminal temporary restraining order, where Jane Doe was seeking protection from sexual assault, yet the Court of Appeal inappropriately viewed the dispute between the parties as merely commercial and under a gag order.[1] Disputes involving victims of sexual violence should never be viewed as just a commercial dispute between two parties. (See e.g. *McNair v. City and County of San Francisco* (2016) 5 Cal.App.5th 1154; *Vivian v. Labrucherie* (2013) 214 Cal.App.4th 267.) Also, a person's state of mind does not fall under the umbrella of confidentiality and is, therefore, admissible in court.

Every California victim who is granted a temporary restraining order, is, by definition, in a vulnerable position and should have their litigation privilege protected even when "not to disparage" clauses are used in their restraining order agreements. Furthermore, no victim would have knowingly forfeited her opportunity to hold her abuser accountable in civil court, because receiving justice is part of a victim's healing process and a deterrent to abusers. Preventing harassment is a public concern, like

1. The U.S. Court of Appeals for the 4th Circuit ruled on July 11, 2019 that gag orders common in police misconduct settlement agreements are unconstitutional and undermine the right to free speech. (See *Overbey v. Mayor & City Council of Baltimore*, No. 17-2444) (4th Cir. 2019)

investigating sheriffs or preventing unstable individuals from driving.

Similarly, federal district judge Kenneth A. Marra of the Southern District of Florida ruled this year that prosecutors had violated the law in the Jeffrey Epstein case by approving a non-prosecution deal with Epstein back in 2007. (See *Jane Does 1 and 2 v. United States*, 359 F.Supp.3d 1201, 1204 (S.D. Fla. 2019) 1219, 1222.) Epstein's case has been held up as a prime example of how insulated, powerful men can escape accountability. This kind of injustice occurred with Jane Doe when Olson persuaded the Court of Appeal to violate California state law (including but not limited to § 527.6(w) of the Code of Civil Procedure), robbing her of her opportunity to hold him accountable.

Respectfully submitted,

Dr. Arlene Drake, PhD. L.M.F.T.
Psychotherapist Trauma Recovery
10780 Santa Monica Blvd. Suite 450
Los Angeles, Ca. 90025
dr@arlenedrake.com (310) 470-1500

Delia Echegaray, M.A. Counseling Psychology,
Credentialed Adult Education Instructor
1400 Gannon Drive
Sacramento, CA 95826
Daleeladances@sbcglobal.net
(916) 804-5569

Fleenelle Morin,
Transactional Analysis Practitioner,
WANT Inst. Coach, Author
2027 Newcastle Ave, # 1154,
Cardiff, CA 92007

PROOF OF SERVICE

Olson v [redacted] case No. [redacted]6503

At the time of service I was over 18 years of age and not a party to this action. I am a resident of or employed in the county where the service occurred; my business/residence address is:
3791 Santa Rosalia Dr., LA, CA 90008

On October 21, 2020, I served the foregoing documents described as:

DEFENDANT [redacted]'S REPLY DEMURRER OF FIRST AMENDED COMPLAINT AND DECLARATION OF [redacted] IN SUPPORT THEREOF.

on all interested parties in this action by electronic mail to the party(s) or US Mail identified on the attached service list using the e-mail address(es) indicated.

SEE SERVICE LIST ATTACHED

(X) VIA ELECTRONIC MAIL. I transmitted a PDF version of this document(s) by electronic mail to the party(s) identified on the attached service list using e-mail address (es) indicated, per the Judicial Council's April 2020, 90 day emergency rule requiring attorneys to accept electronic service of documents, and California Rules of Court, rule 2.251(c)(3) provides that "a party or other person that is required to file documents electronically in an action must also serve documents and accept service of documents electronically from all other parties or persons.
( ) VIA US MAIL I enclosed the documents in a sealed envelope addressed to the persons at the address listed below and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with the practice for collecting and processing correspondence for mailing. One the same day that the correspondence is placed for collecting and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully paid.

[X] **(State)** I declare under penalty of penalty of perjury under the laws of the State of California that the above is true and correct.

[ ] **(Federal)** I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on this **21st** day of **October 2020,** at Los Angeles, California.

Titus Fotso

SERVICE LIST

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(CODE CIV. PROC., §§ 1013, subds. (c), (d) & (g), 1013a, subd. (2); CAL. RULES OF COURT, rules 8.25(a), 8.29, 8.70–8.79, 8.212(c)(1)(3) & 8.520(f)(7); CAL. SUPREME COURT, RULES REGARDING ELECTRONIC FILING, rule 2 [as amended Mar. 18, 2020])

STATE OF CALIFORNIA }
} ss.
COUNTY OF LOS ANGELES }

My name is Robert C. Little. My business address is Buchalter, A Professional Corporation, 1000 Wilshire Boulevard, Suite 1500, Los Angeles, California 90017-1730. My electronic service address is <rlittle@buchalter.com>. I am an active member of the State Bar of California. I am not a party to the cause.

On April 21, 2021, at Beverly Hills, California, I served the foregoing document entitled **OPPOSITION TO DOE'S "CROSS-MOTION" TO STRIKE OLSON'S CONSOLIDATED ANSWER TO MULTIPLE AMICUS CURIAE BRIEFS** on each interested party in this action, as indicated on the attached Service List, as follows:

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/s/ *Robert C. Little*
Robert C. Little

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Supreme Court of California

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STATE OF CALIFORNIA
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Case Number: **S258498**
Lower Court Case Number: **B286105**

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

4/21/2021

Date

/s/Robert Collings Little

Signature

Little, Robert Collings (182396)

Last Name, First Name (PNum)

Buchalter, A Professional Corporation

Law Firm