

No 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AFTER THE UNPUBLISHED OPINION AFFIRMING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
No 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
No SC126806

HON. CRAIG D. KARLAN, JUDGE

**REDACTED COURT RECORDS OF WHICH
JUDICIAL NOTICE IS REQUESTED
VOLUME 1 OF 1, RJN 002-240**

Robert M. Dato, 110408 | Eric Michael Kennedy, 228393

*Robert Collings Little, 182396 | Paul Augusto Alarcón, 275036

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Attorneys for Defendant, Cross-Complainant, and Appellant

CURTIS OLSON

CHRONOLOGICAL INDEX

EXHIBIT	DOCUMENT	PAGES RJN
1	Register of Actions/Civil Case Summary in the matter entitled [Jane Doe] v. Curtis Olson, Los Angeles County Superior Court No. [REDACTED] (Sept. 6, 2017–March 16, 2021)	002–032
2	Certified Shorthand Reporter’s Transcript of Proceedings in the matter entitled [Jane Doe] v. Curtis Olson, Los Angeles County Superior Court No. [REDACTED] (Nov. 16, 2018) by Burris, M., Rptr.	034–183
3	Certified Shorthand Reporter’s Transcript of Proceedings in the matter entitled [Jane Doe] v. Curtis Olson, Los Angeles County Superior Court No. [REDACTED] (Nov. 16, 2018) by Burris, M., Rptr.	185–237
4	Minute Order in the matter entitled [Jane Doe] v. Curtis Olson, Los Angeles County Superior Court No. [REDACTED] (Nov. 19, 2018) (Convey, J.)	239–240

ALPHABETICAL INDEX

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2	Certified Shorthand Reporter's Transcript of Proceedings in the matter entitled [Jane Doe] v. Curtis Olson, Los Angeles County Superior Court No. [REDACTED] (Nov. 16, 2018) by Burris, M., Rptr.	034-183
3	Certified Shorthand Reporter's Transcript of Proceedings in the matter entitled [Jane Doe] v. Curtis Olson, Los Angeles County Superior Court No. [REDACTED] (Nov. 16, 2018) by Burris, M., Rptr.	185-237
4	Minute Order in the matter entitled [Jane Doe] v. Curtis Olson, Los Angeles County Superior Court No. [REDACTED] (Nov. 19, 2018) (Convey, J.)	239-240
1	Register of Actions/Civil Case Summary in the matter entitled [Jane Doe] v. Curtis Olson, Los Angeles County Superior Court No. [REDACTED] (Sept. 6, 2017-March 16, 2021)	002-032

EXHIBIT 1

EXHIBIT 1

CASE INFORMATION

[Case Information](#) | [Register Of Actions](#) | [FUTURE HEARINGS](#) | [PARTY INFORMATION](#) | [Documents Filed](#) | [Proceedings Held](#)

Case Number: [REDACTED]
[REDACTED] VS OLSON, CURTIS

Filing Courthouse: Stanley Mosk Courthouse

Filing Date: 09/06/2017

Case Type: Civil Harassment Prevention (General Jurisdiction)

Status: Open 09/06/2017

[Click here to access document images for this case](#)

If this link fails, you may go to the Case Document Images site and search using the case number displayed on this page

Same Party: [REDACTED]

FUTURE HEARINGS

[Case Information](#) | [Register Of Actions](#) | [FUTURE HEARINGS](#) | [PARTY INFORMATION](#) | [Documents Filed](#) | [Proceedings Held](#)

04/14/2021 at 1:30 PM in Department 81 at 111 North Hill Street, Los Angeles, CA 90012
Request for Order - Other

PARTY INFORMATION

[Case Information](#) | [Register Of Actions](#) | [FUTURE HEARINGS](#) | [PARTY INFORMATION](#) | [Documents Filed](#) | [Proceedings Held](#)

Click on any of the below link(s) to see Register of Action Items on or before the date indicated:

[A](#) - [O](#) - [R](#) - [W](#)

[REDACTED] - Petitioner

[REDACTED] - Respondent (to Appeal)

[REDACTED] - Appellant

BUCHALTER - Depositor

[REDACTED] HOMEOWNERS ASSOCIATION - Other

CHISUM LESLIE - Claimant Reporter

JANNEY & JANNEY - Depositor

KENNEDY ERIC - Attorney for Respondent for Respondent

KENNEDY ERIC - Attorney for Respondent for Appellant

KENNEDY ERIC - Attorney for Respondent for Respondent (to Appeal)

KENNEDY ERIC MICHAEL - Attorney for Respondent for Respondent (to Appeal)

KENNEDY ERIC MICHAEL - Attorney for Respondent for Appellant

KENNEDY ERIC MICHAEL - Attorney for Respondent for Respondent

L.A. DEPOSITIONS INC. - Depositor

LB PROPERTY - Other

LE LAMDIEN - Witness

LE LAMDIEN THANH - Attorney for Participant for Other

[REDACTED] LAW GROUP PC - Other

NEAL TRACY RENEE - Attorney for Participant for Other

OLSON CRISTINE - Other

OLSON CURTIS - Respondent

OLSON CURTIS - Appellant

OLSON CURTIS - Respondent (to Appeal)

Click on any of the below link(s) to see Register of Action Items on or before the date indicated:

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REAGAN BARRY JAMES - Attorney for Participant for Witness

TASHJIAN LISA ARPI - Attorney for Participant for Other

WALKOWIAK JOHN - Appellant

WALKOWIAK JOHN - Claimant

Click on any of the below link(s) to see Register of Action Items on or before the date indicated:

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DOCUMENTS FILED

[Case Information](#) | [Register Of Actions](#) | [FUTURE HEARINGS](#) | [PARTY INFORMATION](#) | [Documents Filed](#) | [Proceedings Held](#)

Documents Filed (Filing dates listed in descending order)

Click on any of the below link(s) to see Register of Action Items on or before the date indicated:

[09/02/2020](#) [02/26/2020](#) [11/06/2019](#) [07/18/2019](#) [02/07/2019](#) [11/15/2018](#) [03/22/2018](#)

03/16/2021 Minute Order

03/16/2021 Opposition

Filed by Respondent

03/16/2021 Ex Parte - Application

Filed by Petitioner

02/01/2021 Minute Order

02/01/2021 Opposition (to Petitioner's Ex Parte Application for an Order Continuing Hearing)

Filed by Respondent

02/01/2021 Ex Parte - Application

Filed by Petitioner

01/22/2021 Appeal - Notice of Default Issued (AMENDED NOTICE Fail to Pay: \$100)

01/22/2021 Appeal - Notice of Default Issued (AMENDED NOTICE Fail to Pay: \$100)

12/18/2020 Order - After Hearing

Filed by Petitioner

12/18/2020 Order - After Hearing (Hearing Dated 11/06/19)

Filed by Petitioner

12/18/2020 Minute Order

12/18/2020 Ex Parte - Application

Filed by Petitioner

12/17/2020 Fee Waiver - Order on Court Fee Waiver - Denied FW003 (DUPLICATE FILING-ORDER GRANTED 12/16/2020)

Filed by Petitioner

12/17/2020 Fee Waiver - Request - Waive Court Fees - Filed FW001

Filed by Petitioner

12/16/2020 Fee Waiver - Order on Court Fee Waiver - Granted FW003

Filed by Petitioner

12/16/2020 Minute Order

11/25/2020 Fee Waiver - Order on Court Fee Waiver - Denied FW003 (Hearing Set)

Filed by Petitioner

11/25/2020 Appeal - Record on Appeal Elected/Designated (Clerk Transcript; Reporter Transcript; "R")

Filed by Petitioner

11/25/2020 Appeal Record Delivered

11/25/2020 Appeal Record Delivered

11/24/2020 Appeal - Ntc Designating Record of Appeal APP-003/010/103 (Filed With Proof of Service; "R")

Filed by Petitioner

11/24/2020 Appeal - Record on Appeal Elected/Designated (Clerk Transcript; Reporter Transcript; "U3")

Filed by Claimant

11/24/2020 Appeal - Ntc Designating Record of Appeal APP-003/010/103 (Filed With Proof of Service)

Filed by Claimant

11/20/2020 Fee Waiver - Request - Waive Court Fees - Filed FW001 (FOR LASC AND DCA)

Filed by Petitioner

11/20/2020 Appeal - Original Clerk's Transcript 6-10 Volumes Certified (CLOSED; 10 vols only; for Notice of Appeal, filed 4/30/20; "U2")

Filed by Claimant

11/20/2020 Appeal - Original Clerk's Transcript 6-10 Volumes Certified (CLOSED; 10 vols only; for Notice of Appeal, filed 4/30/20; "U1")

Filed by Petitioner

11/18/2020 Request - Judicial Notice

Filed by Respondent

11/18/2020 Declaration (OF ERIC KENNEDY.)

Filed by Respondent

11/18/2020 Request - Judicial Notice

Filed by Respondent

11/18/2020 Declaration (In Support of Respondent's Motion to Amend Judgments)

Filed by Respondent

11/18/2020 RFO/MTN - Family Law (Motion to Amend Judgment)

Filed by Respondent

11/12/2020 Appeal - Notice of Filing of Notice of Appeal (N.O.A. 11/10/20 "R")

11/12/2020 Appeal - Notice of Filing of Notice of Appeal (N.O.A. 11/10/20 "U3")

11/10/2020 Appeal - Self-Represented Appellant ("R")

Filed by Petitioner

11/10/2020 Appeal - Notice of Appeal/Cross Appeal Filed ("R"; Fee Waiver GRANTED 12/16/20; DCA Filing Fee Not Received)

Filed by Petitioner

11/10/2020 Appeal - Notice of Appeal/Cross Appeal Filed ("U3"; Fee Waiver GRANTED 7/7/20; DCA Filing Fee Not Received)

Filed by Claimant

11/05/2020 Appeal - Clerk's Transcript Fee Paid (RESPONDENT PAID \$1098.04)

Filed by Respondent

10/23/2020 Appeal - Notice of Fees Due for Clerk's Transcript on Appeal

10/13/2020 Notice - Ruling

Filed by Respondent

10/12/2020 LACourtConnect-Fees Paid A

Filed by Respondent

10/07/2020 Proof of Service

Filed by Claimant

10/07/2020 Notice (completion of limited scope representation)

10/07/2020 Notice - Limited Scope Representation

Filed by Petitioner

10/07/2020 Minute Order

10/07/2020 Minute Order

10/06/2020 Remote Appearance - Scheduled

Filed by Petitioner

10/06/2020 Remote Appearance - Scheduled

Filed by Respondent

10/06/2020 Remote Appearance - Scheduled

Filed by Respondent

10/01/2020 Reply (In Support of Motion to Vacate Void Order dated 11/6/2019; Memorandum of Points & Authorities)

Filed by Claimant

10/01/2020 Reply (In Support of Motion to Strike or Tax Costs and Supplemental Declaration of [REDACTED])

Filed by Petitioner

09/24/2020 Responsive Declaration

Filed by Claimant

09/24/2020 Responsive Declaration

Filed by Petitioner

09/24/2020 Minute Order

09/24/2020 Ex Parte - Application

Filed by Respondent

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09/02/2020 Appeal - Ntc Designating Record of Appeal APP-003/010/103 (Filed With Proof of Service "U2")

Filed by Claimant

09/01/2020 Appellate Order Granting Relief from Default (Order granting appellate 10 days to file an amended designation.)

09/01/2020 Appellate Order Granting Relief from Default (Appellant order granting appellant 10 days to file an amended designation.)

08/11/2020 Appeal - Notice of Non-Compliance (Appellant failed to timely file a Notice Designating Record on Appeal.)

07/09/2020 Declaration (of Eric Kennedy in support of memorandum of cost)
Filed by Respondent

07/09/2020 Memorandum - Costs
Filed by Respondent

07/07/2020 Fee Waiver - Order on Court Fee Waiver - Granted FW003
Filed by Claimant

07/07/2020 Fee Waiver - Request - Waive Court Fees - Filed FW001
Filed by Claimant

06/26/2020 Opposition (to Specially Appearing Nonparty's Motion to Vacate Void Order Dated 11/6/19)
Filed by Respondent

06/26/2020 Declaration (of Eric Kennedy in support of respondent's opposition to petitioner's motion to strike or tax costs)
Filed by Respondent

06/26/2020 Opposition (to petitioner's motion to strike or tax costs)
Filed by Respondent

06/26/2020 Declaration (of Eric Kennedy in support of respondent's opposition to specially appearing nonparty's motin to vacate void order dated 11/6/19)
Filed by Respondent

06/24/2020 Proof of Service
Filed by Petitioner

06/24/2020 170.6 CCP Peremptory Challenge (***)case not assigned to this department(***))
Filed by Petitioner

06/24/2020 Minute Order

06/19/2020 Appeal - Notice of Default Issued ("U2" Fail to File Designation/Election; Fail to Pay: REPORTER TRANSCRIPT FEES)

06/18/2020 Notice - Court Hearing (Set for 7/9/20)
Filed by Claimant

06/18/2020 Notice - Court Hearing (Set for 7/9/20)
Filed by Petitioner

06/15/2020 Appeal Document (Turndown Letter "U2" NOA 4/30/20 dsgn)
Filed by Claimant

06/15/2020 Appeal Document (Turndown Letter "U2" NOA 4/30/20 fee waiver)
Filed by Claimant

06/10/2020 Minute Order

05/28/2020 Appeal - Ntc Designating Record of Appeal APP-003/010/103 ("U1" Filed With Proof of Service)
Filed by Petitioner

05/27/2020 Fee Waiver - Order on Court Fee Waiver - Granted FW003
Filed by Claimant

05/27/2020 Fee Waiver - Request - Waive Court Fees - Filed FW001
Filed by Claimant

05/27/2020 RFO/MTN - Vacate (RE Other: Motion to Vacate Void Order and Amend Judgment Dated 11-6-19)
Filed by Claimant

05/19/2020 Appeal Document (TURNDOWN DESIGNATION)
Filed by Claimant

05/19/2020 Appeal Document (TURNDOWN DESIGNATION)
Filed by Petitioner

05/14/2020 Appeal - Notice of Filing of Notice of Appeal (NOA:4/30/20; "U2")

05/14/2020 Appeal - Notice of Filing of Notice of Appeal (NOA:4/30/20; "U1")

04/30/2020 Appeal - Notice of Appeal/Cross Appeal Filed (General Appeal; "U1")
Filed by Petitioner

04/30/2020 Appeal - Notice of Appeal/Cross Appeal Filed (General Appeal; "U2")
Filed by Claimant

04/17/2020 Miscellaneous (NONPARTY ATW TRUST'S JOINDER IN THE MOTION OF PETITIONER ██████████ ██████████ TO STRIKE & TAX COSTS CLAIMED IN A MEMORANDUM OF COSTS MISLEADINGLY DATED MARCH 10, 2020, FILED ON AN UNKNOWN DATE, SERVED MARCH 30, 2020 AND/OR ON OTHER DATES AND/OR NOT SERVED ON SOME INTEREST PARTIES)
Filed by Claimant

04/17/2020 RFO/MTN - Family Law

Filed by Petitioner

03/13/2020 Notice (Proposed findings and order after hearing)

Filed by Petitioner

03/13/2020 Objection (Amended nonparty ATW Trust's)

Filed by Petitioner

03/12/2020 Proof of Service - Mail (OBJECTION TO PROPOSED ORDERS 2/28/2020)

Filed by Petitioner

03/12/2020 Objection (TO PROPOSED ORDERS 2/28/2020)

Filed by Petitioner

02/28/2020 Notice (Non-Party ATW Trust Notice of Documents' Status And Objections To Produce Documents Relating To ATW Trust Under Seal)

02/28/2020 Minute Order

02/28/2020 Minute Order

02/28/2020 Minute Order

02/28/2020 Minute Order

Click on any of the below link(s) to see Register of Action Items on or before the date indicated:

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02/26/2020 Notice (CURTIS OLSON'S NOTICE OF JUDGMENT DEBTOR ATW TRUST'S FAILURE TO COMPLY WITH COURT ORDERS)

Filed by Respondent

02/24/2020 Reply

Filed by Petitioner

02/24/2020 Reply

Filed by Petitioner

02/24/2020 Refund Check Processed (CK# 29036181 2/18/20 TWR# 20*5118 2/6/20 REQ# 20358-01)

Filed by Depositor

02/24/2020 Refund Check Processed (CHECK WAS ELECTRONIC TRANSFER ON 2/6/20 SAP# 1910379524 2/6/20 REQ# 20359-01)

Filed by Claimant Reporter

02/14/2020 Opposition

Filed by Respondent

02/14/2020 Minute Order

02/14/2020 Minute Order

02/14/2020 Minute Order

02/06/2020 Writ - Execution (\$78,602.03 base on 4/17/19 and 11/6/19 amended order attorney fees Los Angeles County place on basket)

Filed by Attorney for Respondent

02/05/2020 Request for Refund of Reporter Appeal Transcript Deposit (NOA 6/17/19 APPROVED: 1/30/20)

01/30/2020 Refund Approved (Unused Transcript)

Filed by Depositor

01/30/2020 Refund Approved (Court Reporter Transcript)

Filed by Claimant Reporter

01/22/2020 Minute Order

01/22/2020 Miscellaneous (Petitioner's Jurisdictional Challenge; Requests A Statement of Decision)

Filed by Petitioner

01/17/2020 Appeal Record Delivered

01/17/2020 Appeal Record Delivered

01/15/2020 Minute Order

01/15/2020 Refund Initiated (Unused Transcript)

Filed by Depositor

01/15/2020 Refund Initiated (Court Reporter Transcript)

Filed by Claimant Reporter

01/15/2020 Affidavit for Rise Funds/Req for Payment Rptr Appeal Trnscpt (NOA 6/17/19 COURT REPORTER: LESLIE CHISUM)

01/15/2020 Proof of Service (re Reply to Motn to Strike)

Filed by Petitioner

01/15/2020 Reply (Motion to Strike or Tax Costs; MP&A; Declaration of [REDACTED])

Filed by Petitioner

01/14/2020 Minute Order

01/14/2020 Opposition (to Petitioner [REDACTED] [REDACTED] Ex Parte Application)
Filed by Respondent

01/14/2020 Ex Parte - Application
Filed by Claimant

01/14/2020 Appeal - Original Clerk's Transcript 6-10 Volumes Certified (CLOSED; "X"; see also Notice of Appeal, filed 6/6/19 ("U"))
Filed by Respondent

01/14/2020 Appeal - Original Clerk's Transcript 6-10 Volumes Certified (CLOSED; "U"; see also Cross-Appeal, filed 6/17/19 ("X"))
Filed by Petitioner

01/08/2020 Opposition
Filed by Respondent

01/08/2020 Declaration
Filed by Respondent

01/08/2020 Proof of Service
Filed by Respondent

12/24/2019 Writ - Execution
Filed by Attorney for Respondent

12/23/2019 RFO/MTN - Set Aside
Filed by Petitioner

12/20/2019 Responsive Declaration
Filed by Respondent

12/20/2019 Ex Parte - Application
Filed by Petitioner

12/20/2019 Minute Order

12/18/2019 Appeal - Opinion Received; Remittitur Due in 60 Days (Order to consolidate is granted.B295388)
Filed by Petitioner

12/18/2019 Appeal - Reporter Appeal Transcripts

12/18/2019 Appeal - Request for Court-Paid Clerk's Transcript Granted

12/18/2019 Appeal - Request for Court-Paid Clerk's Transcript Granted

12/18/2019 Appeal - Notice of Fees Due for Clerk's Transcript on Appeal

12/18/2019 Appeal - Notice of Fees Due for Clerk's Transcript on Appeal

12/11/2019 Writ - Execution
Filed by Attorney for Respondent

12/11/2019 Minute Order

12/11/2019 Notice (And Statement of Disqualification Of The Honorable Emily Spear (CCP 170.1) And Declaration of [REDACTED] [REDACTED] In Support Thereof)
Filed by Petitioner

12/06/2019 RFO/MTN - Family Law (Motion to Strike or Tax Costs)
Filed by Petitioner

12/04/2019 Reply (For Petitioner's Request for Additional Time To Produce Documents Re: ATW Trust)
Filed by Petitioner

12/04/2019 Proof of Service
Filed by Respondent

12/04/2019 Proof of Service
Filed by Respondent

12/04/2019 Proof of Service
Filed by Respondent

12/04/2019 Proof of Service
Filed by Respondent

11/26/2019 Opposition (Respondent Curtis Olson's Opposition To Petitioner [REDACTED] [REDACTED])
Filed by Respondent

11/26/2019 Memorandum - Costs (After Judg, Acknowledgment of Credit, And Decl of Accrued Interest)
Filed by Respondent

11/07/2019 Abstract - of Judgment (Issued base on order 11/06/19 \$78,602.03)
Filed by Attorney for Respondent

11/07/2019 Abstract - of Judgment (issued base on order 11/6/19 \$78,602.03)
Filed by Attorney for Respondent

Click on any of the below link(s) to see Register of Action Items on or before the date indicated:

TOP 09/02/2020 02/26/2020 11/06/2019 07/18/2019 02/07/2019 11/15/2018 03/22/2018

11/06/2019 Notice (entry of ord granting exparte)

Filed by Respondent

11/06/2019 Nunc Pro Tunc Minute Order

11/06/2019 Minute Order

11/06/2019 Order (Granting Ex Parte Application Of Respondent Curtis Olson To Amend Judgment To Add Judgment Debtors)

11/06/2019 Opposition (to Ex Parte Order To Compel Production and Add ATW Trust As Judgment Debtor)

Filed by Petitioner

11/06/2019 Ex Parte - Application

Filed by Respondent

10/31/2019 RFO/MTN - Family Law (Extend time)

Filed by Petitioner

10/31/2019 Appeal - Notice Court Reporter to Prepare Appeal Transcript (Initial;)

10/03/2019 Order (re Continuation of Hearing on Amended Motion For Protective Order, Continuance of Judgment Debtor's Examination, And Production of Trust Documents Under Seal)

Filed by Respondent

09/30/2019 Appeal - Reporter Appeal Transcript Process Fee Paid

Filed by Respondent

09/30/2019 Appeal - Reporter Appeal Transcripts Deposit Paid (TRNSCRB Fund)

Filed by Respondent

09/30/2019 Appeal - Ntc Designating Record of Appeal APP-003/010/103 (Filed With Proof of Service)

Filed by Respondent

09/26/2019 Declaration

Filed by Other

09/26/2019 Minute Order

09/26/2019 Minute Order

09/26/2019 Proof of Service

Filed by Petitioner

09/26/2019 Objection

Filed by Petitioner

09/23/2019 Declaration

Filed by Respondent

09/23/2019 Miscellaneous (Reply Amended Motion for Protective Order Staying Discovery Pending Appeal or In The Alternative Motion To Quash; Memorandum of Points & Authorities and Amended Declaration of [REDACTED] [REDACTED] in Support Thereof)

Filed by Petitioner

09/23/2019 Proof of Service (petnr's reply amended motion prot. order w/amended declaration)

Filed by Petitioner

09/20/2019 Reply

Filed by Petitioner

09/19/2019 Notice (of ord to produce docs)

Filed by Respondent

09/19/2019 RFO/MTN - Continue

Filed by Petitioner

09/13/2019 Declaration (of Eric Kennedy in support of respdt's opposition to petnr's amended motion for protective order)

Filed by Respondent

09/13/2019 Opposition (to petnr's Amended Motion for Protective Order)

Filed by Respondent

09/11/2019 Appeal - Notice of Default Issued (Fail to File Designation/Election; Fail to Pay: REPORTER TRANSCRIPT FEES AND DEPOSIT)

09/04/2019 Minute Order

09/04/2019 Minute Order

09/04/2019 Minute Order

09/04/2019 Opposition (to Petitioner [REDACTED] [REDACTED] Ex Parte Application For An Order Shortening Time to Have Heard a Motion for Protective Order)

Filed by Respondent

09/04/2019 Ex Parte - Application

Filed by Petitioner

08/30/2019 RFO/MTN - Family Law (AMENDED: re Prot. Order and Motn to Quash)
Filed by Petitioner

08/15/2019 Responsive Declaration (to Ex Parte Request for Order)
Filed by Respondent

08/15/2019 Ex Parte - Application
Filed by Petitioner

08/15/2019 Minute Order

08/09/2019 RFO/MTN - Protective Order
Filed by Petitioner

08/09/2019 Appeal Document (TURNDOWN LETTER: CLERK'S TRANSCRIPT TO APPENDIX)
Filed by Attorney for Respondent

08/08/2019 Notice (of Entry of Order to Add Judgment Debtor's)
Filed by Respondent

08/06/2019 Abstract - of Judgment (2nd amended as to debtors name \$78,602.03)
Filed by Attorney for Respondent

08/02/2019 Proof of Service
Filed by Respondent

07/31/2019 Abstract - of Judgment (amended (\$78,602.03))
Filed by Attorney for Respondent

07/29/2019 Affidavit (of Identity And Order)
Filed by Respondent

07/19/2019 Minute Order

Click on any of the below link(s) to see Register of Action Items on or before the date indicated:

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07/18/2019 RFO/MTN - Family Law (RE Application and Order for Appearance and Examination Enforcement of Judgment - Judgment Debtor)
Filed by Respondent

07/18/2019 RFO/MTN - Judgment Debtor Examination
Filed by Other

06/27/2019 Appeal - Reporter Appeal Transcripts Deposit Paid (TRNSCRB Fund)
Filed by Respondent

06/27/2019 Appeal - Reporter Appeal Transcript Process Fee Paid
Filed by Respondent

06/27/2019 Appeal - Ntc Designating Record of Appeal APP-003/010/103 (Filed With Proof of Service)
Filed by Respondent

06/25/2019 Appeal - Record on Appeal Elected/Designated (Clerk Transcript; Reporter Transcript; WILL LODGE WITH DCA)
Filed by Petitioner

06/25/2019 Appeal - Ntc Designating Record of Appeal APP-003/010/103 (Filed With Proof of Service)
Filed by Petitioner

06/21/2019 Writ - Execution (atty fees orange county \$78,602.03)
Filed by Attorney for Respondent

06/17/2019 Appeal - Superior Court Appeal Filing Fee Paid
Filed by Respondent

06/17/2019 Appeal - Notice of Appeal/Cross Appeal Filed (General Appeal)
Filed by Respondent

06/14/2019 Appeal Record Delivered

06/13/2019 Abstract - of Judgment (issued attorney fees \$78,602.03)
Filed by Attorney for Respondent

06/13/2019 Application (& Order for Appearance & Examination)
Filed by Respondent

06/10/2019 Appeal - Original Clerk's Transcript 1-5 Volumes Certified (CLOSED)

06/06/2019 Appeal - Self-Represented Appellant
Filed by Petitioner

06/06/2019 Proof of Service - Mail
Filed by Petitioner

06/06/2019 Appeal - Notice of Appeal/Cross Appeal Filed (General Appeal)
Filed by Petitioner

05/17/2019 Appeal - Notice of Fees Due for Clerk's Transcript on Appeal

05/15/2019 Writ - Execution (Los Angeles county \$78,602.03 base on order 4/17/19)
Filed by Respondent

05/15/2019 Abstract - of Judgment (\$78,602.03 base on order date 4/17/19)
Filed by Respondent

05/15/2019 Writ - Execution (\$1,582.48 base on 4/17/19 Los Angeles County)
Filed by Respondent

05/15/2019 Abstract - of Judgment (\$1,582.48 base on 4/17,19)
Filed by Respondent

04/25/2019 Minute Order

04/17/2019 Order (Re Respondent Curtis Olson's Motion for Attorney's Fees and Costs Pursuant to Code of Civil Procedure Section 527.6)
Filed by Respondent

04/17/2019 Order (Granting Petitioner [REDACTED] Motion to Strike or Tax Costs of \$1,718.19)
Filed by Petitioner

04/17/2019 Order (Striking Statement of Disqualification; Verified Answer)

04/16/2019 Proof of Service
Filed by Respondent

04/16/2019 Proof of Service
Filed by Respondent

04/16/2019 Minute Order

04/16/2019 170.1 CCP Motion to Disqualify (Petitioner's [REDACTED] [REDACTED]'s Notice and Statement of Disqualification of the Honorable Michael Convey [C.C.P. Section 170.1(a)(1)(A); C.C.P. Section 170.1 (a) (6)(A)(iii); C.C.P. Section 170.1 (a)(6)(B)])
Filed by Petitioner

04/16/2019 Notice (of Withdrawal of Notice of Motion and Motion for Protective Order)
Filed by Other

04/09/2019 Declaration (of Ryan A. Vogt-Lowell)
Filed by Respondent

04/09/2019 Declaration (of Ashley Milnes)
Filed by Respondent

04/09/2019 Declaration (of Eric Kennedy)
Filed by Respondent

04/09/2019 Reply
Filed by Respondent

04/09/2019 Objection
Filed by Respondent

04/09/2019 Request - Judicial Notice
Filed by Respondent

04/09/2019 Brief (closing brief in support of motion striking or taxing costs)
Filed by Petitioner

03/18/2019 Appeal - Notice of Default Issued (;Fail to Pay \$100 filing fee;)

03/15/2019 Order - Findings and Order After Hearing
Filed by Respondent

03/15/2019 Order - Findings and Order After Hearing
Filed by Respondent

03/15/2019 Declaration (OF [REDACTED])
Filed by Other

03/15/2019 Memorandum - Points and Authorities
Filed by Other

03/15/2019 RFO/MTN - Protective Order
Filed by Other

02/15/2019 Minute Order

02/15/2019 Declaration (of Benjamin F. Kanani in Opposition to Respondent Curtis Olson's Motion for Attorney's Fees)
Filed by Petitioner

02/15/2019 Proof of Service
Filed by Petitioner

02/15/2019 Responsive Declaration (to Request for Order)

Filed by Petitioner

02/15/2019 Declaration - Income and Expense

Filed by Petitioner

02/13/2019 Fee Waiver - Order on Court Fee Waiver - Granted FW003

Filed by Petitioner

02/13/2019 Fee Waiver - Request - Waive Court Fees - Filed FW001

Filed by Petitioner

02/11/2019 Proof of Service

Filed by Petitioner

02/11/2019 RFO/MTN - Protective Order

Filed by Petitioner

Click on any of the below link(s) to see Register of Action Items on or before the date indicated:

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02/07/2019 Proof of Service - Mail

Filed by Petitioner

02/07/2019 Appeal - Ntc Designating Record of Appeal APP-003/010/103 (Filed With Proof of Service)

Filed by Petitioner

02/05/2019 Fee Waiver - Order on Court Fee Waiver - Denied FW003

Filed by Petitioner

01/31/2019 Appeal - Notice of Filing of Notice of Appeal

Filed by Petitioner

01/30/2019 Fee Waiver - Order on Court Fee Waiver - Granted FW003

Filed by Petitioner

01/30/2019 Fee Waiver - Request - Waive Court Fees - Filed FW001

Filed by Petitioner

01/30/2019 Proof of Service - Mail (for Notice of Appeal (via Overnight Delivery))

Filed by Petitioner

01/30/2019 Proof of Service (Personal Service; for Notice of Appeal)

Filed by Petitioner

01/28/2019 Appeal - Self-Represented Appellant

Filed by Petitioner

01/28/2019 Fee Waiver - Request - Waive Court Fees - Filed FW001

Filed by Petitioner

01/28/2019 Appeal - Notice of Appeal/Cross Appeal Filed (without Proof of Service)

Filed by Petitioner

01/25/2019 Notice - Motion (and Motion for Attorney's Fees and Costs Pursuant section 527.6)

Filed by Respondent

01/25/2019 Declaration (of Eric Kennedy in Support of Respondent Curtis Olson's Notice of Motion and Motion for Attorney's Fees and Costs Pursuant to Code of Civil Procedure section 527.6)

Filed by Respondent

01/25/2019 RFO/MTN - Protective Order (Attorney's Fees and Cost)

Filed by Respondent

01/16/2019 Minute Order as Order After Hearing

01/16/2019 Minute Order

01/16/2019 Minute Order as Order After Hearing

01/16/2019 Minute Order

01/16/2019 Minute Order as Order After Hearing (Motion for New Trial)

01/16/2019 Minute Order as Order After Hearing (Motion for Reconsideration)

01/14/2019 Objection (Curtis Olson's Evidentiary)

Filed by Respondent

01/14/2019 Order (Orders on Evidentiary Objections)

Filed by Respondent

01/10/2019 Declaration (of Rex Harrison in Support)

Filed by Petitioner

01/10/2019 Reply (in Support of Motion for Reconsideration; Third Supplemental Declaration of [REDACTED])

Filed by Petitioner

01/10/2019 Declaration (Third Supplemental Declaration of [REDACTED] [REDACTED] for Reply in Support of Motion for New Trial and Reconsideration; Exhibits 2)
Filed by Petitioner

01/10/2019 Declaration (Third Supplemental Declaration of [REDACTED] [REDACTED] for Reply in Support of Motion for New Trial and Reconsideration; Exhibits 1)
Filed by Petitioner

01/04/2019 Responsive Declaration (to Request for Order (Motion for New Trial))
Filed by Respondent

01/04/2019 Responsive Declaration (to Request for Order (Motion for Reconsideration))
Filed by Respondent

01/03/2019 Stipulation (for Schedule to File Opposition and Reply Briefs for Motion for Reconsideration and Motion for New Trial by Petitioner [REDACTED] [REDACTED])
Filed by Respondent

12/24/2018 Stipulation (to Reschedule Hearing Date on Motions for Reconsideration and For New Trial, and [Proposed] Order Thereon)
Filed by Petitioner

12/24/2018 Minute Order

12/17/2018 Minute Order

12/14/2018 Notice (of Errata for Motion for New Trial, Memorandum of Points and Authorities Supplemental and Superseding Declarations of [REDACTED] [REDACTED] and Loren Marken)

12/05/2018 RFO/MTN - Continue (Notice of Intention to Move for New Trial)
Filed by Petitioner

12/05/2018 RFO/MTN - Reconsideration
Filed by Petitioner

11/29/2018 Nunc Pro Tunc Minute Order

11/28/2018 Substitution of Attorney
Filed by Attorney for Petitioner

11/20/2018 Notice - Lodging
Filed by Petitioner

11/19/2018 Minute Order

11/16/2018 Minute Order

11/16/2018 Stipulation (Receipt and Order Re Release of Civil Exhibits)
Filed by Petitioner

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11/15/2018 Minute Order

11/14/2018 Minute Order

11/14/2018 Minute Order

11/14/2018 Warrant - Bench Warrant Issued Civil (Recalled and Quashed on 11/19/2018. The requesting party failed to pay the fee to the Sheriff's Department.)

11/14/2018 Notice - Hearing & Order on Reissuance TRO (Form 116)
Filed by Petitioner

11/14/2018 Order (Granting Non-Party Cristine Olson's Ex Parte Application to Quash Witness Subpoena to Cristine Olson)
Filed by Other

11/14/2018 Proof of Service
Filed by Other

11/14/2018 Witness List
Filed by Petitioner

11/14/2018 Exhibit List
Filed by Petitioner

11/13/2018 Order (Ex Parte (FL-305))

11/13/2018 Declaration (of Non-Party Christine Olson in Support of Ex Parte Application to Quash Witness Subpoena)

11/13/2018 Declaration (of Jennifer A. Mauri In Support of Ex Parte Applicatio to Quash Witness Subpoena to Christine Olson)

11/13/2018 Ex Parte - Application
Filed by Other

10/15/2018 Subpoena (Civil Subpoena for Personal Appearance at Trial or Hearing)
Filed by Petitioner

09/06/2018 Subpoena (Civil (Amado Merano))
Filed by Petitioner

09/06/2018 Subpoena (Civil (Christine Olson))
Filed by Petitioner

09/06/2018 Subpoena (Civil (Robert Kilian))
Filed by Petitioner

09/06/2018 Subpoena (Civil (Kelley Patrica Hemmeter O'neil))
Filed by Petitioner

09/06/2018 Subpoena (Civil (Maggie Argue))
Filed by Petitioner

09/06/2018 Subpoena (Civil (Elsa Monroy))
Filed by Petitioner

09/06/2018 Subpoena (Civil (David Feder))
Filed by Petitioner

09/06/2018 Subpoena (Civil (David Silver))
Filed by Petitioner

08/23/2018 Minute Order

08/16/2018 Supplemental
Filed by Respondent

08/16/2018 Declaration (gemma karapetyan)
Filed by Respondent

08/16/2018 Reply (in support of motion)
Filed by Respondent

08/10/2018 Responsive Declaration
Filed by Petitioner

08/01/2018 Minute Order

08/01/2018 Memorandum - Points and Authorities (in Support of Petitioner's Ex Parte Request for Order)
Filed by Petitioner

08/01/2018 Ex Parte - Application
Filed by Petitioner

06/21/2018 Declaration
Filed by Respondent

06/21/2018 Declaration
Filed by Respondent

06/21/2018 Declaration
Filed by Respondent

06/21/2018 Proof of Service
Filed by Respondent

06/21/2018 Motion (Notice of Motion and Motion to Reopen Discovery and for Sanctions)
Filed by Respondent

05/25/2018 Notice ([REDACTED])
Filed by Respondent

05/23/2018 Notice (related case [REDACTED])
Filed by Respondent

05/23/2018 Notice (related case [REDACTED])
Filed by Respondent

05/10/2018 Minute Order

05/04/2018 Supplemental (Declaration of [REDACTED] [REDACTED])
Filed by Petitioner

04/30/2018 Notice - Hearing & Order on Reissuance TRO (Form 116)
Filed by Petitioner

04/30/2018 Minute Order

04/26/2018 Miscellaneous (Notice of Unavailability of Witness Subpoenaed)
Filed by Attorney for Participant

04/26/2018 Proof of Service (Civil Subpoena for Personal Appearance at the Trial Or Hearing)
Filed by Petitioner

04/24/2018 Opposition (to Petitioner's Ex Parte Application)
Filed by Other

04/24/2018 Minute Order

04/24/2018 Ex Parte - Application (for an Order Compelling a Viewing of Surveillance Footage with an Expert, Further Production of Business Records, and to Add Amado Merano as an Additional Protected Person; Memorandum of Points and Authorities; Declaration of Amado Merano In Support Thereof)
Filed by Petitioner

04/19/2018 Declaration (of Eric Kennedy in Support of Respondent Curtis Olson's Request for Civil Harassment Restraining Orders)
Filed by Respondent

04/02/2018 Minute Order

03/23/2018 Reply (To Petitioner's Opposition To Motion To Quash)
Filed by Witness

03/23/2018 Objection (Evidentiary objections to declaration of [REDACTED])
Filed by Witness

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03/22/2018 Reply (to LB Property Management Opposition to Petitioner's Motion for an Order Compelling Further Production of Business Records from LB Prpoerty Management)
Filed by Petitioner

03/20/2018 Opposition (to Motion to Quash Petitioner's Civil Subpoena for Personal Appearance at Trial or Hearing)
Filed by Petitioner

03/16/2018 Opposition (to Pet's Motion for an Order Compelling Further Production of Business Records)
Filed by Witness

03/16/2018 Objection (/Evidentiary to [REDACTED] Declaration)
Filed by Witness

03/16/2018 Notice - Motion (to Quash Petitioner's Civil Subpoena for Personal Appearance at Trial or Hearing and Request for Attorney's Fees, Memorandum of Points, etc....)
Filed by Witness

03/02/2018 Motion (For An Order Compelling Further Production Of Business Records)
Filed by Petitioner

02/14/2018 Substitution of Attorney
Filed by Petitioner

02/14/2018 Proof of Service (of subpoena for personal appearance)
Filed by Petitioner

01/23/2018 Notice - Hearing & Order on Reissuance TRO (Form 116)
Filed by Petitioner

01/23/2018 Request to Continue and Reissue TRO (Form 115)
Filed by Petitioner

01/23/2018 Minute Order

01/23/2018 Stipulation and Order
Filed by Petitioner

01/23/2018 Ex Parte - Application
Filed by Petitioner

01/23/2018 Proof of Service
Filed by Petitioner

01/23/2018 Declaration - Ex Parte Notice (Notice Given)
Filed by Petitioner

01/23/2018 Fee Waiver - Request - Waive Court Fees - Filed FW001
Filed by Petitioner

01/23/2018 Fee Waiver - Order on Court Fee Waiver - Granted FW003
Filed by Petitioner

01/19/2018 Substitution of Attorney
Filed by Petitioner

01/16/2018 Minute Order

01/03/2018 Proof of Service (served motion for order compelling production of business records)
Filed by Petitioner

12/08/2017 Motion (for order compelling production of business records)
Filed by Petitioner

12/04/2017 Request to Continue and Reissue TRO (Form 115)
Filed by Petitioner

12/04/2017 Notice - Hearing & Order on Reissuance TRO (Form 116)

Filed by Petitioner

12/04/2017 Minute Order

11/08/2017 Stipulation (to Continue Hearing)

Filed by Respondent

11/08/2017 Request to Continue and Reissue TRO (Form 115)

Filed by Respondent

11/08/2017 Notice - Hearing & Order on Reissuance TRO (Form 116)

Filed by Petitioner

11/08/2017 Minute Order

10/17/2017 Request to Continue and Reissue TRO (Form 115)

Filed by Petitioner

10/17/2017 Notice - Hearing & Order on Reissuance TRO (Form 116)

Filed by Petitioner

10/17/2017 Minute Order

10/17/2017 Substitution of Attorney

Filed by Petitioner

09/27/2017 Request to Continue and Reissue TRO (Form 115)

Filed by Respondent

09/27/2017 Notice - Hearing & Order on Reissuance TRO (Form 116)

Filed by Petitioner

09/27/2017 Stipulation - Judge Pro Tem/Referee (Michelle Kizadi)

Filed by Petitioner

09/27/2017 Proof of Service (served TRO)

Filed by Petitioner

09/26/2017 Declaration (of Curtis Olson)

Filed by Respondent

09/26/2017 Declaration (of Dane Olson)

Filed by Respondent

09/26/2017 Declaration (of Dylan Olson)

Filed by Respondent

09/26/2017 Response - Civil Harassment

Filed by Respondent

09/14/2017 Proof of Service

Filed by Petitioner

09/06/2017 Civil Case Cover Sheet (Addendum and Statement of Location)

09/06/2017 Declaration - Ex Parte Notice (No Notice Given)

Filed by Petitioner

09/06/2017 Notice - Court Hearing (Form 109)

Filed by Petitioner

09/06/2017 Temporary Restraining Order (Form 110)

Filed by Petitioner

09/06/2017 Petition - Civil Harassment

Filed by Petitioner

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PROCEEDINGS HELD

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03/16/2021 at 8:30 AM in Department 81, Wilcox, Wendy L., Presiding
Ex Parte Hearing - **Granted**

02/01/2021 at 8:30 AM in Department 81, Wilcox, Wendy L., Presiding

Ex Parte Hearing - **Granted**

12/18/2020 at 8:30 AM in Department 81, Weingart, Gregory J, Presiding

Ex Parte Hearing - **Held - Order Made**

12/16/2020 at 1:30 PM in Department 81, Weingart, Gregory J, Presiding

Fee Waiver Hearing - **Denied**

10/07/2020 at 8:30 AM in Department 81, Weingart, Gregory J, Presiding

Request for Order - Other - **Held - Order Made**

10/07/2020 at 8:30 AM in Department 81, Weingart, Gregory J, Presiding

Request for Order - Other - **Held - Order Made**

09/24/2020 at 8:30 AM in Department 81, Weingart, Gregory J, Presiding

Ex Parte Hearing - **Denied**

06/24/2020 at 8:30 AM in Department 65, Scaduto, Lynn H., Presiding

Non-Appearance Case Review - **Held - Order Made**

06/10/2020 at 8:30 AM in Department 65, Scaduto, Lynn H., Presiding

Non-Appearance Case Review - **Held - Order Made**

02/28/2020 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Request for Order - Other - **Denied**

02/28/2020 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Hearing - **Held - Order Made**

02/28/2020 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Request for Order Hearing - **Denied**

02/28/2020 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Court's Order to Show Cause Hearing - **Held - Order Made**

02/14/2020 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Hearing - **Not Held - Continued - Department Dark**

02/14/2020 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Court's Order to Show Cause Hearing - **Not Held - Continued - Department Dark**

02/14/2020 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Request for Order Hearing - **Not Held - Continued - Department Dark**

01/22/2020 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Request for Order - Other - **Granted**

01/15/2020 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Court's Order to Show Cause Hearing - **Held - Order Made**

01/14/2020 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Ex Parte Hearing - **Denied**

12/20/2019 at 1:30 PM in Department 2, Riff, Lawrence P., Presiding

Ex Parte Hearing - **Denied**

12/11/2019 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Request for Order Hearing - **Held - Order Made**

11/06/2019 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Nunc Pro Tunc Order Hearing - **Held - Order Made**

11/06/2019 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Ex Parte Hearing - **Held - Order Made**

09/26/2019 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Request for Order Hearing - **Held - Continued**

09/26/2019 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Hearing - **Held - Continued**

09/04/2019 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Hearing - **Held - Continued**

09/04/2019 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Ex Parte Hearing - **Denied**

09/04/2019 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Hearing - **Held - Order Made**

08/15/2019 at 1:30 PM in Department 2, Kaufman, Shelley, Presiding

Ex Parte Hearing - **Denied**

07/19/2019 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Hearing - **Off Calendar - Request of Respondent**

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04/25/2019 at 8:30 AM in Department D, Convey, Michael J., Presiding
Non-Appearance Case Review - **Held - Order Made**

04/16/2019 at 1:30 PM in Department J, Convey, Michael J., Presiding
Motion Hearing - **Off Calendar - Moving Party**

02/15/2019 at 8:30 AM in Department D, Convey, Michael J., Presiding
Non-Appearance Case Review - **Held - Order Made**

01/16/2019 at 8:30 AM in Department D, Convey, Michael J., Presiding
Motion for a New Trial Hearing - **Denied**

01/16/2019 at 8:30 AM in Department D, Convey, Michael J., Presiding
Motion Hearing - **Denied**

12/24/2018 at 8:30 AM in Department D, Convey, Michael J., Presiding
Non-Appearance Case Review - **Held - Order Made**

12/17/2018 at 8:30 AM in Department D, Convey, Michael J., Presiding
Non-Appearance Case Review - **Held - Order Made**

11/29/2018 at 8:30 AM in Department D, Convey, Michael J., Presiding
Nunc Pro Tunc Order Hearing - **Held - Order Made**

11/19/2018 at 8:30 AM in Department D, Convey, Michael J., Presiding
Restraining Order Hearing - **Denied - RO- After Evidence by both**

11/16/2018 at 8:30 AM in Department D, Convey, Michael J., Presiding
Restraining Order Hearing - **Held - Continued**

11/15/2018 at 8:30 AM in Department D, Convey, Michael J., Presiding
Restraining Order Hearing - **Held - Continued**

11/14/2018 at 8:30 AM in Department D, Convey, Michael J., Presiding
Restraining Order Hearing - **Held - Continued, TRO Reissued**

11/14/2018 at 8:30 AM in Department D, Convey, Michael J., Presiding
Ex Parte Hearing - **Held - Order Made**

08/23/2018 at 8:30 AM in Department 65, Weingart, Gregory J., Presiding
Motion Hearing - **Denied**

08/01/2018 at 8:30 AM in Department 2, Kaufman, Shelley, Presiding
Ex Parte Hearing - **Denied**

05/10/2018 at 8:30 AM in Department D, Convey, Michael J., Presiding
Ex Parte Hearing - **Denied - Without Prejudice**

04/30/2018 at 8:30 AM in Department 2, Lewis, Thomas Trent, Presiding
Restraining Order Hearing - **Held - Continued, TRO Reissued**

04/24/2018 at 8:30 AM in Department F, Goldberg, Hank M., Presiding
Ex Parte Hearing - **Denied**

04/02/2018 at 8:30 AM in Department F, Goldberg, Hank M., Presiding
Motion Hearing - **Granted - In Part**

01/23/2018 at 8:30 AM in Department F, Goldberg, Hank M., Presiding
Ex Parte Hearing - **Off Calendar - Case Settled**

01/16/2018 at 8:30 AM in Department F, Goldberg, Hank M., Presiding
Motion Hearing - **Off Calendar - Request of Petitioner**

12/04/2017 at 8:30 AM in Department F, Goldberg, Hank M., Presiding
Restraining Order Hearing - **Not Held - Continued by Petitioner**

Click on any of the below link(s) to see Register of Action Items on or before the date indicated:

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11/08/2017 at 8:30 AM in Department F
Restraining Order Hearing - **Not Held - Continued by Stipulation**

10/17/2017 at 8:30 AM in Department F, Breddan, Matthew A, Presiding
Restraining Order Hearing - **Held - Continued, TRO Reissued**

09/27/2017 at 8:30 AM in Department F, Kazadi, Michelle L, Presiding
Restraining Order Hearing - **Held - Continued, TRO Reissued**

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03/16/2021 at 8:30 AM in Department 81, Wilcox, Wendy L., Presiding

Ex Parte Hearing - **Granted**

03/16/2021 Ex Parte - Application

Filed by Petitioner

03/16/2021 Opposition

Filed by Respondent

03/16/2021 Minute Order

02/01/2021 at 8:30 AM in Department 81, Wilcox, Wendy L., Presiding

Ex Parte Hearing - **Granted**

02/01/2021 Ex Parte - Application

Filed by Petitioner

02/01/2021 Opposition (to Petitioner's Ex Parte Application for an Order Continuing Hearing)

Filed by Respondent

02/01/2021 Minute Order

01/22/2021 Appeal - Notice of Default Issued (AMENDED NOTICE Fail to Pay: \$100)

01/22/2021 Appeal - Notice of Default Issued (AMENDED NOTICE Fail to Pay: \$100)

12/18/2020 at 8:30 AM in Department 81, Weingart, Gregory J., Presiding

Ex Parte Hearing - **Held - Order Made**

12/18/2020 Ex Parte - Application

Filed by Petitioner

12/18/2020 Order - After Hearing

Filed by Petitioner

12/18/2020 Order - After Hearing (Hearing Dated 11/06/19)

Filed by Petitioner

12/18/2020 Minute Order

12/17/2020 Fee Waiver - Request - Waive Court Fees - Filed FW001

Filed by Petitioner

12/17/2020 Fee Waiver - Order on Court Fee Waiver - Denied FW003 (DUPLICATE FILING-ORDER GRANTED 12/16/2020)

Filed by Petitioner

12/16/2020 at 1:30 PM in Department 81, Weingart, Gregory J., Presiding

Fee Waiver Hearing - **Denied**

12/16/2020 Minute Order

12/16/2020 Fee Waiver - Order on Court Fee Waiver - Granted FW003

Filed by Petitioner

11/25/2020 Appeal Record Delivered

11/25/2020 Appeal - Record on Appeal Elected/Designated (Clerk Transcript; Reporter Transcript; "R")

Filed by Petitioner

11/25/2020 Appeal Record Delivered

11/25/2020 Fee Waiver - Order on Court Fee Waiver - Denied FW003 (Hearing Set)

Filed by Petitioner

11/24/2020 Appeal - Ntc Designating Record of Appeal APP-003/010/103 (Filed With Proof of Service)

Filed by Claimant

11/24/2020 Appeal - Record on Appeal Elected/Designated (Clerk Transcript; Reporter Transcript; "U3")

Filed by Claimant

11/24/2020 Appeal - Ntc Designating Record of Appeal APP-003/010/103 (Filed With Proof of Service; "R")

Filed by Petitioner

11/20/2020 Appeal - Original Clerk's Transcript 6-10 Volumes Certified (CLOSED; 10 vols only; for Notice of Appeal, filed 4/30/20; "U1")

Filed by Petitioner

11/20/2020 Fee Waiver - Request - Waive Court Fees - Filed FW001 (FOR LASC AND DCA)
Filed by Petitioner

11/20/2020 Appeal - Original Clerk's Transcript 6-10 Volumes Certified (CLOSED; 10 vols only; for Notice of Appeal, filed 4/30/20; "U2")
Filed by Claimant

11/18/2020 RFO/MTN - Family Law (Motion to Amend Judgment)
Filed by Respondent

11/18/2020 Request - Judicial Notice
Filed by Respondent

11/18/2020 Request - Judicial Notice
Filed by Respondent

11/18/2020 Declaration (In Support of Respondent's Motion to Amend Judgments)
Filed by Respondent

11/18/2020 Declaration (OF ERIC KENNEDY.)
Filed by Respondent

11/12/2020 Appeal - Notice of Filing of Notice of Appeal (N.O.A. 11/10/20 "R")
11/12/2020 Appeal - Notice of Filing of Notice of Appeal (N.O.A. 11/10/20 "U3")

11/10/2020 Appeal - Self-Represented Appellant ("R")
Filed by Petitioner

11/10/2020 Appeal - Notice of Appeal/Cross Appeal Filed ("R"; Fee Waiver GRANTED 12/16/20; DCA Filing Fee Not Received)
Filed by Petitioner

11/10/2020 Appeal - Notice of Appeal/Cross Appeal Filed ("U3"; Fee Waiver GRANTED 7/7/20; DCA Filing Fee Not Received)
Filed by Claimant

11/05/2020 Appeal - Clerk's Transcript Fee Paid (RESPONDENT PAID \$1098.04)
Filed by Respondent

10/23/2020 Appeal - Notice of Fees Due for Clerk's Transcript on Appeal

10/13/2020 Notice - Ruling
Filed by Respondent

10/12/2020 LACourtConnect-Fees Paid A
Filed by Respondent

10/07/2020 at 8:30 AM in Department 81, Weingart, Gregory J, Presiding
Request for Order - Other - **Held - Order Made**

10/07/2020 at 8:30 AM in Department 81, Weingart, Gregory J, Presiding
Request for Order - Other - **Held - Order Made**

10/07/2020 Minute Order

10/07/2020 Notice - Limited Scope Representation
Filed by Petitioner

10/07/2020 Minute Order

10/07/2020 Notice (completion of limited scope representation)

10/07/2020 Proof of Service
Filed by Claimant

10/06/2020 Remote Appearance - Scheduled
Filed by Respondent

10/06/2020 Remote Appearance - Scheduled
Filed by Respondent

10/06/2020 Remote Appearance - Scheduled
Filed by Petitioner

10/01/2020 Reply (In Support of Motion to Strike or Tax Costs and Supplemental Declaration of [REDACTED])
Filed by Petitioner

10/01/2020 Reply (In Support of Motion to Vacate Void Order dated 11/6/2019; Memorandum of Points & Authorities)
Filed by Claimant

09/24/2020 at 8:30 AM in Department 81, Weingart, Gregory J, Presiding
Ex Parte Hearing - **Denied**

09/24/2020 Ex Parte - Application
Filed by Respondent

09/24/2020 Minute Order

09/24/2020 Responsive Declaration

Filed by Petitioner

09/24/2020 Responsive Declaration

Filed by Claimant

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09/02/2020 Appeal - Ntc Designating Record of Appeal APP-003/010/103 (Filed With Proof of Service "U2")

Filed by Claimant

09/01/2020 Appellate Order Granting Relief from Default (Order granting appellate 10 days to file an amended designation.)

09/01/2020 Appellate Order Granting Relief from Default (Appellant order granting appellant 10 days to file an amended designation.)

08/11/2020 Appeal - Notice of Non-Compliance (Appellant failed to timely file a Notice Designating Record on Appeal.)

07/09/2020 Memorandum - Costs

Filed by Respondent

07/09/2020 Declaration (of Eric Kennedy in support of memorandum of cost)

Filed by Respondent

07/07/2020 Fee Waiver - Request - Waive Court Fees - Filed FW001

Filed by Claimant

07/07/2020 Fee Waiver - Order on Court Fee Waiver - Granted FW003

Filed by Claimant

06/26/2020 Opposition (to Specially Appearing Nonparty's Motion to Vacate Void Order Dated 11/6/19)

Filed by Respondent

06/26/2020 Opposition (to petitioner's motion to strike or tax costs)

Filed by Respondent

06/26/2020 Declaration (of Eric Kennedy in support of respondent's opposition to specially appearing nonparty's motin to vacate void order dated 11/6/19)

Filed by Respondent

06/26/2020 Declaration (of Eric Kennedy in support of respondent's oppsition to petitioner's motion to strike or tax costs)

Filed by Respondent

06/24/2020 at 8:30 AM in Department 65, Scaduto, Lynn H., Presiding

Non-Appearance Case Review - **Held - Order Made**

06/24/2020 Minute Order

06/24/2020 170.6 CCP Peremptory Challenge (***)case not assigned to this department(***)

Filed by Petitioner

06/24/2020 Proof of Service

Filed by Petitioner

06/19/2020 Appeal - Notice of Default Issued ("U2" Fail to File Designation/Election; Fail to Pay: REPORTER TRANSCRIPT FEES)

06/18/2020 Notice - Court Hearing (Set for 7/9/20)

Filed by Petitioner

06/18/2020 Notice - Court Hearing (Set for 7/9/20)

Filed by Claimant

06/15/2020 Appeal Document (Turndown Letter "U2" NOA 4/30/20 fee waiver)

Filed by Claimant

06/15/2020 Appeal Document (Turndown Letter "U2" NOA 4/30/20 dsgn)

Filed by Claimant

06/10/2020 at 8:30 AM in Department 65, Scaduto, Lynn H., Presiding

Non-Appearance Case Review - **Held - Order Made**

06/10/2020 Minute Order

05/28/2020 Appeal - Ntc Designating Record of Appeal APP-003/010/103 ("U1" Filed With Proof of Service)

Filed by Petitioner

05/27/2020 RFO/MTN - Vacate (RE Other: Motion to Vacate Void Order and Amend Judgment Dated 11-6-19)

Filed by Claimant

05/27/2020 Fee Waiver - Request - Waive Court Fees - Filed FW001

Filed by Claimant

05/27/2020 Fee Waiver - Order on Court Fee Waiver - Granted FW003

Filed by Claimant

05/19/2020 Appeal Document (TURNDOWN DESIGNATION)

Filed by Petitioner

05/19/2020 Appeal Document (TURNDOWN DESIGNATION)

Filed by Claimant

05/14/2020 Appeal - Notice of Filing of Notice of Appeal (NOA:4/30/20; "U1")

05/14/2020 Appeal - Notice of Filing of Notice of Appeal (NOA:4/30/20; "U2")

04/30/2020 Appeal - Notice of Appeal/Cross Appeal Filed (General Appeal; "U1")

Filed by Petitioner

04/30/2020 Appeal - Notice of Appeal/Cross Appeal Filed (General Appeal; "U2")

Filed by Claimant

04/17/2020 Miscellaneous (NONPARTY ATW TRUST'S JOINDER IN THE MOTION OF PETITIONER ██████████ ██████████ TO STRIKE & TAX COSTS CLAIMED IN A MEMORANDUM OF COSTS MISLEADINGLY DATED MARCH 10, 2020, FILED ON AN UNKNOWN DATE, SERVED MARCH 30, 2020 AND/OR ON OTHER DATES AND/OR NOT SERVED ON SOME INTEREST PARTIES)

Filed by Claimant

04/17/2020 RFO/MTN - Family Law

Filed by Petitioner

03/13/2020 Notice (Proposed findings and order after hearing)

Filed by Petitioner

03/13/2020 Objection (Amended nonparty ATW Trust's)

Filed by Petitioner

03/12/2020 Objection (TO PROPOSED ORDERS 2/28/2020)

Filed by Petitioner

03/12/2020 Proof of Service - Mail (OBJECTION TO PROPOSED ORDERS 2/28/2020)

Filed by Petitioner

02/28/2020 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Court's Order to Show Cause Hearing - **Held - Order Made**

02/28/2020 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Request for Order Hearing - **Denied**

02/28/2020 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Request for Order - Other - **Denied**

02/28/2020 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Hearing - **Held - Order Made**

02/28/2020 Minute Order

02/28/2020 Minute Order

02/28/2020 Minute Order

02/28/2020 Minute Order

02/28/2020 Notice (Non-Party ATW Trust Notice of Documents' Status And Objections To Produce Documents Relating To ATW Trust Under Seal)

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02/26/2020 Notice (CURTIS OLSON'S NOTICE OF JUDGMENT DEBTOR ATW TRUST'S FAILURE TO COMPLY WITH COURT ORDERS)

Filed by Respondent

02/24/2020 Reply

Filed by Petitioner

02/24/2020 Refund Check Processed (CK# 29036181 2/18/20 TWR# 20*5118 2/6/20 REQ# 20358-01)

Filed by Depositor

02/24/2020 Reply

Filed by Petitioner

02/24/2020 Refund Check Processed (CHECK WAS ELECTRONIC TRANSFER ON 2/6/20 SAP# 1910379524 2/6/20 REQ# 20359-01)

Filed by Claimant Reporter

02/14/2020 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Hearing - **Not Held - Continued - Department Dark**

02/14/2020 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Court's Order to Show Cause Hearing - **Not Held - Continued - Department Dark**

02/14/2020 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Request for Order Hearing - **Not Held - Continued - Department Dark**

02/14/2020 Minute Order

02/14/2020 Opposition

Filed by Respondent

02/14/2020 Minute Order

02/14/2020 Minute Order

02/06/2020 Writ - Execution (\$78,602.03 base on 4/17/19 and 11/6/19 amended order attorney fees Los Angeles County place on basket)
Filed by Attorney for Respondent

02/05/2020 Request for Refund of Reporter Appeal Transcript Deposit (NOA 6/17/19 APPROVED: 1/30/20)

01/30/2020 Refund Approved (Court Reporter Transcript)
Filed by Claimant Reporter

01/30/2020 Refund Approved (Unused Transcript)
Filed by Depositor

01/22/2020 at 8:30 AM in Department 65, Spear, Emily T., Presiding
Request for Order - Other - **Granted**

01/22/2020 Miscellaneous (Petitioner's Jurisdictional Challenge; Requests A Statement of Decision)
Filed by Petitioner

01/22/2020 Minute Order

01/17/2020 Appeal Record Delivered

01/17/2020 Appeal Record Delivered

01/15/2020 at 8:30 AM in Department 65, Spear, Emily T., Presiding
Court's Order to Show Cause Hearing - **Held - Order Made**

01/15/2020 Proof of Service (re Reply to Motn to Strike)
Filed by Petitioner

01/15/2020 Minute Order

01/15/2020 Refund Initiated (Unused Transcript)
Filed by Depositor

01/15/2020 Affidavit for Rise Funds/Req for Payment Rptr Appeal Trnscpt (NOA 6/17/19 COURT REPORTER: LESLIE CHISUM)

01/15/2020 Refund Initiated (Court Reporter Transcript)
Filed by Claimant Reporter

01/15/2020 Reply (Motion to Strike or Tax Costs; MP&A; Declaration of [REDACTED] [REDACTED])
Filed by Petitioner

01/14/2020 at 8:30 AM in Department 65, Spear, Emily T., Presiding
Ex Parte Hearing - **Denied**

01/14/2020 Opposition (to Petitioner [REDACTED] [REDACTED] Ex Parte Application)
Filed by Respondent

01/14/2020 Minute Order

01/14/2020 Appeal - Original Clerk's Transcript 6-10 Volumes Certified (CLOSED; "X"; see also Notice of Appeal, filed 6/6/19 ("U"))
Filed by Respondent

01/14/2020 Appeal - Original Clerk's Transcript 6-10 Volumes Certified (CLOSED; "U"; see also Cross-Appeal, filed 6/17/19 ("X"))
Filed by Petitioner

01/14/2020 Ex Parte - Application
Filed by Claimant

01/08/2020 Proof of Service
Filed by Respondent

01/08/2020 Declaration
Filed by Respondent

01/08/2020 Opposition
Filed by Respondent

12/24/2019 Writ - Execution
Filed by Attorney for Respondent

12/23/2019 RFO/MTN - Set Aside
Filed by Petitioner

12/20/2019 at 1:30 PM in Department 2, Riff, Lawrence P., Presiding
Ex Parte Hearing - **Denied**

12/20/2019 Ex Parte - Application
Filed by Petitioner

12/20/2019 Minute Order

12/20/2019 Responsive Declaration

Filed by Respondent

12/18/2019 Appeal - Request for Court-Paid Clerk's Transcript Granted

12/18/2019 Appeal - Reporter Appeal Transcripts

12/18/2019 Appeal - Request for Court-Paid Clerk's Transcript Granted

12/18/2019 Appeal - Notice of Fees Due for Clerk's Transcript on Appeal

12/18/2019 Appeal - Notice of Fees Due for Clerk's Transcript on Appeal

12/18/2019 Appeal - Opinion Received; Remittitur Due in 60 Days (Order to consolidate is granted.B295388)

Filed by Petitioner

12/11/2019 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Request for Order Hearing - **Held - Order Made**

12/11/2019 Writ - Execution

Filed by Attorney for Respondent

12/11/2019 Minute Order

12/11/2019 Notice (And Statement of Disqualification Of The Honorable Emily Spear (CCP 170.1) And Declaration of [REDACTED] [REDACTED] In Support Thereof)

Filed by Petitioner

12/06/2019 RFO/MTN - Family Law (Motion to Strike or Tax Costs)

Filed by Petitioner

12/04/2019 Proof of Service

Filed by Respondent

12/04/2019 Proof of Service

Filed by Respondent

12/04/2019 Reply (For Petitioner's Request for Additional Time To Produce Documents Re: ATW Trust)

Filed by Petitioner

12/04/2019 Proof of Service

Filed by Respondent

12/04/2019 Proof of Service

Filed by Respondent

11/26/2019 Memorandum - Costs (After Judg, Acknowledgment of Credit, And Decl of Accrued Interest)

Filed by Respondent

11/26/2019 Opposition (Respondent Curtis Olson's Opposition To Petitioner [REDACTED] [REDACTED])

Filed by Respondent

11/07/2019 Abstract - of Judgment (issued base on order 11/6/19 \$78,602.03)

Filed by Attorney for Respondent

11/07/2019 Abstract - of Judgment (Issued base on order 11/06/19 \$78,602.03)

Filed by Attorney for Respondent

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11/06/2019 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Ex Parte Hearing - **Held - Order Made**

11/06/2019 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Nunc Pro Tunc Order Hearing - **Held - Order Made**

11/06/2019 Notice (entry of ord granting exparte)

Filed by Respondent

11/06/2019 Order (Granting Ex Parte Application Of Respondent Curtis Olson To Amend Judgment To Add Judgment Debtors)

11/06/2019 Nunc Pro Tunc Minute Order

11/06/2019 Opposition (to Ex Parte Order To Compel Production and Add ATW Trust As Judgment Debtor)

Filed by Petitioner

11/06/2019 Minute Order

11/06/2019 Ex Parte - Application

Filed by Respondent

10/31/2019 RFO/MTN - Family Law (Extend time)

Filed by Petitioner

10/31/2019 Appeal - Notice Court Reporter to Prepare Appeal Transcript (Initial;)

10/03/2019 Order (re Continuation of Hearing on Amended Motion For Protective Order, Continuance of Judgment Debtor's Examination, And Production of Trust Documents Under Seal)

Filed by Respondent

09/30/2019 Appeal - Reporter Appeal Transcripts Deposit Paid (TRNSCRB Fund)

Filed by Respondent

09/30/2019 Appeal - Ntc Designating Record of Appeal APP-003/010/103 (Filed With Proof of Service)

Filed by Respondent

09/30/2019 Appeal - Reporter Appeal Transcript Process Fee Paid

Filed by Respondent

09/26/2019 at 8:30 AM in Department 65, Spear, Emily T., Presiding
Request for Order Hearing - **Held - Continued**

09/26/2019 at 8:30 AM in Department 65, Spear, Emily T., Presiding
Hearing - **Held - Continued**

09/26/2019 Proof of Service

Filed by Petitioner

09/26/2019 Declaration

Filed by Other

09/26/2019 Objection

Filed by Petitioner

09/26/2019 Minute Order

09/26/2019 Minute Order

09/23/2019 Miscellaneous (Reply Amended Motion for Protective Order Staying Discovery Pending Appeal or In The Alternative Motion To Quash;
Memorandum of Points & Authorities and Amended Declaration of [REDACTED] [REDACTED] in Support Thereof)

Filed by Petitioner

09/23/2019 Declaration

Filed by Respondent

09/23/2019 Proof of Service (petnr's reply amended motion prot. order w/amended declaration)

Filed by Petitioner

09/20/2019 Reply

Filed by Petitioner

09/19/2019 RFO/MTN - Continue

Filed by Petitioner

09/19/2019 Notice (of ord to produce docs)

Filed by Respondent

09/13/2019 Declaration (of Eric Kennedy in support of respdt's opposition to petnr's amended motion for protective order)

Filed by Respondent

09/13/2019 Opposition (to petnr's Amended Motion for Protective Order)

Filed by Respondent

09/11/2019 Appeal - Notice of Default Issued (Fail to File Designation/Election; Fail to Pay: REPORTER TRANSCRIPT FEES AND DEPOSIT)

09/04/2019 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Ex Parte Hearing - **Denied**

09/04/2019 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Hearing - **Held - Order Made**

09/04/2019 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Hearing - **Held - Continued**

09/04/2019 Minute Order

09/04/2019 Minute Order

09/04/2019 Ex Parte - Application

Filed by Petitioner

09/04/2019 Opposition (to Petitioner [REDACTED] [REDACTED] Ex Parte Application For An Order Shortening Time to Have Heard a Motion for Protective Order)

Filed by Respondent

09/04/2019 Minute Order

08/30/2019 RFO/MTN - Family Law (AMENDED: re Prot. Order and Motn to Quash)

Filed by Petitioner

08/15/2019 at 1:30 PM in Department 2, Kaufman, Shelley, Presiding

Ex Parte Hearing - **Denied**

08/15/2019 Ex Parte - Application

Filed by Petitioner

08/15/2019 Minute Order

08/15/2019 Responsive Declaration (to Ex Parte Request for Order)

Filed by Respondent

08/09/2019 RFO/MTN - Protective Order

Filed by Petitioner

08/09/2019 Appeal Document (TURNDOWN LETTER: CLERK'S TRANSCRIPT TO APPENDIX)

Filed by Attorney for Respondent

08/08/2019 Notice (of Entry of Order to Add Judgment Debtor's)

Filed by Respondent

08/06/2019 Abstract - of Judgment (2nd amended as to debtors name \$78,602.03)

Filed by Attorney for Respondent

08/02/2019 Proof of Service

Filed by Respondent

07/31/2019 Abstract - of Judgment (amended (\$78,602.03))

Filed by Attorney for Respondent

07/29/2019 Affidavit (of Identity And Order)

Filed by Respondent

07/19/2019 at 8:30 AM in Department 65, Spear, Emily T., Presiding

Hearing - **Off Calendar - Request of Respondent**

07/19/2019 Minute Order

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07/18/2019 RFO/MTN - Family Law (RE Application and Order for Appearance and Examination Enforcement of Judgment - Judgment Debtor)

Filed by Respondent

07/18/2019 RFO/MTN - Judgment Debtor Examination

Filed by Other

06/27/2019 Appeal - Reporter Appeal Transcript Process Fee Paid

Filed by Respondent

06/27/2019 Appeal - Reporter Appeal Transcripts Deposit Paid (TRNSCRB Fund)

Filed by Respondent

06/27/2019 Appeal - Ntc Designating Record of Appeal APP-003/010/103 (Filed With Proof of Service)

Filed by Respondent

06/25/2019 Appeal - Ntc Designating Record of Appeal APP-003/010/103 (Filed With Proof of Service)

Filed by Petitioner

06/25/2019 Appeal - Record on Appeal Elected/Designated (Clerk Transcript; Reporter Transcript; WILL LODGE WITH DCA)

Filed by Petitioner

06/21/2019 Writ - Execution (atty fees orange county \$78,602.03)

Filed by Attorney for Respondent

06/17/2019 Appeal - Notice of Appeal/Cross Appeal Filed (General Appeal)

Filed by Respondent

06/17/2019 Appeal - Superior Court Appeal Filing Fee Paid

Filed by Respondent

06/14/2019 Appeal Record Delivered

06/13/2019 Application (& Order for Appearance & Examination)

Filed by Respondent

06/13/2019 Abstract - of Judgment (issued attorney fees \$78,602.03)

Filed by Attorney for Respondent

06/10/2019 Appeal - Original Clerk's Transcript 1-5 Volumes Certified (CLOSED)

06/06/2019 Appeal - Self-Represented Appellant

Filed by Petitioner

06/06/2019 Appeal - Notice of Appeal/Cross Appeal Filed (General Appeal)

Filed by Petitioner

06/06/2019 Proof of Service - Mail

Filed by Petitioner

05/17/2019 Appeal - Notice of Fees Due for Clerk's Transcript on Appeal

05/15/2019 Writ - Execution (Los Angeles county \$78,602.03 base on order 4/17/19)

Filed by Respondent

05/15/2019 Abstract - of Judgment (\$1,582.48 base on 4/17,19)

Filed by Respondent

05/15/2019 Writ - Execution (\$1,582.48 base on 4/17/19 Los Angeles County)

Filed by Respondent

05/15/2019 Abstract - of Judgment (\$78,602.03 base on order date 4/17/19)

Filed by Respondent

04/25/2019 at 8:30 AM in Department D, Convey, Michael J., Presiding

Non-Appearance Case Review - **Held - Order Made**

04/25/2019 Minute Order

04/17/2019 Order (Granting Petitioner [REDACTED] Motion to Strike or Tax Costs of \$1,718.19)

Filed by Petitioner

04/17/2019 Order (Re Respondent Curtis Olson's Motion for Attorney's Fees and Costs Pursuant to Code of Civil Procedure Section 527.6)

Filed by Respondent

04/17/2019 Order (Striking Statement of Disqualification; Verified Answer)

04/16/2019 at 1:30 PM in Department J, Convey, Michael J., Presiding

Motion Hearing - **Off Calendar - Moving Party**

04/16/2019 Minute Order

04/16/2019 Notice (of Withdrawal of Notice of Motion and Motion for Protective Order)

Filed by Other

04/16/2019 Proof of Service

Filed by Respondent

04/16/2019 Proof of Service

Filed by Respondent

04/16/2019 170.1 CCP Motion to Disqualify (Petitioner's [REDACTED]'s Notice and Statement of Disqualification of the Honorable Michael Convey [C.C.P.

Section 170.1(a)(1)(A); C.C.P. Section 170.1 (a) (6)(A)(iii); C.C.P. Section 170.1 (a)(6)(B)])

Filed by Petitioner

04/09/2019 Objection

Filed by Respondent

04/09/2019 Declaration (of Eric Kennedy)

Filed by Respondent

04/09/2019 Brief (closing brief in support of motion striking or taxing costs)

Filed by Petitioner

04/09/2019 Declaration (of Ashley Milnes)

Filed by Respondent

04/09/2019 Request - Judicial Notice

Filed by Respondent

04/09/2019 Declaration (of Ryan A. Vogt-Lowell)

Filed by Respondent

04/09/2019 Reply

Filed by Respondent

03/18/2019 Appeal - Notice of Default Issued (;Fail to Pay \$100 filing fee;)

03/15/2019 Order - Findings and Order After Hearing

Filed by Respondent

03/15/2019 RFO/MTN - Protective Order

Filed by Other

03/15/2019 Memorandum - Points and Authorities

Filed by Other

03/15/2019 Order - Findings and Order After Hearing

Filed by Respondent

03/15/2019 Declaration (OF [REDACTED])

Filed by Other

02/15/2019 at 8:30 AM in Department D, Convey, Michael J., Presiding

Non-Appearance Case Review - **Held - Order Made**

02/15/2019 Responsive Declaration (to Request for Order)

Filed by Petitioner

02/15/2019 Declaration (of Benjamin F. Kanani in Opposition to Respondent Curtis Olson's Motion for Attorney's Fees)
Filed by Petitioner

02/15/2019 Declaration - Income and Expense
Filed by Petitioner

02/15/2019 Minute Order

02/15/2019 Proof of Service
Filed by Petitioner

02/13/2019 Fee Waiver - Order on Court Fee Waiver - Granted FW003
Filed by Petitioner

02/13/2019 Fee Waiver - Request - Waive Court Fees - Filed FW001
Filed by Petitioner

02/11/2019 RFO/MTN - Protective Order
Filed by Petitioner

02/11/2019 Proof of Service
Filed by Petitioner

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02/07/2019 Proof of Service - Mail
Filed by Petitioner

02/07/2019 Appeal - Ntc Designating Record of Appeal APP-003/010/103 (Filed With Proof of Service)
Filed by Petitioner

02/05/2019 Fee Waiver - Order on Court Fee Waiver - Denied FW003
Filed by Petitioner

01/31/2019 Appeal - Notice of Filing of Notice of Appeal
Filed by Petitioner

01/30/2019 Proof of Service (Personal Service; for Notice of Appeal)
Filed by Petitioner

01/30/2019 Proof of Service - Mail (for Notice of Appeal (via Overnight Delivery))
Filed by Petitioner

01/30/2019 Fee Waiver - Order on Court Fee Waiver - Granted FW003
Filed by Petitioner

01/30/2019 Fee Waiver - Request - Waive Court Fees - Filed FW001
Filed by Petitioner

01/28/2019 Appeal - Notice of Appeal/Cross Appeal Filed (without Proof of Service)
Filed by Petitioner

01/28/2019 Fee Waiver - Request - Waive Court Fees - Filed FW001
Filed by Petitioner

01/28/2019 Appeal - Self-Represented Appellant
Filed by Petitioner

01/25/2019 RFO/MTN - Protective Order (Attorney's Fees and Cost)
Filed by Respondent

01/25/2019 Declaration (of Eric Kennedy in Support of Respondent Curtis Olson's Notice of Motion and Motion for Attorney's Fees and Costs Pursuant to Code of Civil Procedure section 527.6)
Filed by Respondent

01/25/2019 Notice - Motion (and Motion for Attorney's Fees and Costs Pursuant section 527.6)
Filed by Respondent

01/16/2019 at 8:30 AM in Department D, Convey, Michael J., Presiding
Motion Hearing - **Denied**

01/16/2019 at 8:30 AM in Department D, Convey, Michael J., Presiding
Motion for a New Trial Hearing - **Denied**

01/16/2019 Minute Order as Order After Hearing (Motion for Reconsideration)

01/16/2019 Minute Order

01/16/2019 Minute Order

01/16/2019 Minute Order as Order After Hearing (Motion for New Trial)

01/16/2019 Minute Order as Order After Hearing

01/16/2019 Minute Order as Order After Hearing

01/14/2019 Order (Orders on Evidentiary Objections)
Filed by Respondent

01/14/2019 Objection (Curtis Olson's Evidentiary)
Filed by Respondent

01/10/2019 Reply (in Support of Motion for Reconsideration; Third Supplemental Declaration of [REDACTED] [REDACTED])
Filed by Petitioner

01/10/2019 Declaration (Third Supplemental Declaration of [REDACTED] [REDACTED] for Reply in Support of Motion for New Trial and Reconsideration; Exhibits 1)
Filed by Petitioner

01/10/2019 Declaration (of Rex Harrison in Support)
Filed by Petitioner

01/10/2019 Declaration (Third Supplemental Declaration of [REDACTED] [REDACTED] for Reply in Support of Motion for New Trial and Reconsideration; Exhibits 2)
Filed by Petitioner

01/04/2019 Responsive Declaration (to Request for Order (Motion for Reconsideration))
Filed by Respondent

01/04/2019 Responsive Declaration (to Request for Order (Motion for New Trial))
Filed by Respondent

01/03/2019 Stipulation (for Schedule to File Opposition and Reply Briefs for Motion for Reconsideration and Motion for New Trial by Petitioner [REDACTED] [REDACTED])
Filed by Respondent

12/24/2018 at 8:30 AM in Department D, Convey, Michael J., Presiding
Non-Appearance Case Review - **Held - Order Made**

12/24/2018 Stipulation (to Reschedule Hearing Date on Motions for Reconsideration and For New Trial, and [Proposed] Order Thereon)
Filed by Petitioner

12/24/2018 Minute Order

12/17/2018 at 8:30 AM in Department D, Convey, Michael J., Presiding
Non-Appearance Case Review - **Held - Order Made**

12/17/2018 Minute Order

12/14/2018 Notice (of Errata for Motion for New Trial, Memorandum of Points and Authorities Supplemental and Superseding Declarations of [REDACTED] [REDACTED] and Loren Marken)

12/05/2018 RFO/MTN - Continue (Notice of Intention to Move for New Trial)
Filed by Petitioner

12/05/2018 RFO/MTN - Reconsideration
Filed by Petitioner

11/29/2018 at 8:30 AM in Department D, Convey, Michael J., Presiding
Nunc Pro Tunc Order Hearing - **Held - Order Made**

11/29/2018 Nunc Pro Tunc Minute Order

11/28/2018 Substitution of Attorney
Filed by Attorney for Petitioner

11/20/2018 Notice - Lodging
Filed by Petitioner

11/19/2018 at 8:30 AM in Department D, Convey, Michael J., Presiding
Restraining Order Hearing - **Denied - RO- After Evidence by both**

11/19/2018 Minute Order

11/16/2018 at 8:30 AM in Department D, Convey, Michael J., Presiding
Restraining Order Hearing - **Held - Continued**

11/16/2018 Stipulation (Receipt and Order Re Release of Civil Exhibits)
Filed by Petitioner

11/16/2018 Minute Order

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11/15/2018 at 8:30 AM in Department D, Convey, Michael J., Presiding
Restraining Order Hearing - **Held - Continued**

11/15/2018 Minute Order

11/14/2018 at 8:30 AM in Department D, Convey, Michael J., Presiding
Restraining Order Hearing - **Held - Continued, TRO Reissued**

11/14/2018 at 8:30 AM in Department D, Convey, Michael J., Presiding
Ex Parte Hearing - **Held - Order Made**

11/14/2018 Witness List
Filed by Petitioner

11/14/2018 Proof of Service
Filed by Other

11/14/2018 Order (Granting Non-Party Cristine Olson's Ex Parte Application to Quash Witness Subpoena to Cristine Olson)
Filed by Other

11/14/2018 Minute Order

11/14/2018 Minute Order

11/14/2018 Warrant - Bench Warrant Issued Civil (Recalled and Quashed on 11/19/2018. The requesting party failed to pay the fee to the Sheriff's Department.
)

11/14/2018 Notice - Hearing & Order on Reissuance TRO (Form 116)
Filed by Petitioner

11/14/2018 Exhibit List
Filed by Petitioner

11/13/2018 Declaration (of Non-Party Christine Olson in Support of Ex Parte Application to Quash Witness Subpoena)

11/13/2018 Declaration (of Jennifer A. Mauri In Support of Ex Parte Applicatio to Quash Witness Subpoena to Christine Olson)

11/13/2018 Order (Ex Parte (FL-305))

11/13/2018 Ex Parte - Application
Filed by Other

10/15/2018 Subpoena (Civil Subpoena for Personal Appearance at Trial or Hearing)
Filed by Petitioner

09/06/2018 Subpoena (Civil (Christine Olson))
Filed by Petitioner

09/06/2018 Subpoena (Civil (Amado Merano))
Filed by Petitioner

09/06/2018 Subpoena (Civil (David Feder))
Filed by Petitioner

09/06/2018 Subpoena (Civil (Robert Killian))
Filed by Petitioner

09/06/2018 Subpoena (Civil (Elsa Monroy))
Filed by Petitioner

09/06/2018 Subpoena (Civil (Maggie Argue))
Filed by Petitioner

09/06/2018 Subpoena (Civil (Kelley Patrica Hemmeter O'neil))
Filed by Petitioner

09/06/2018 Subpoena (Civil (David Silver))
Filed by Petitioner

08/23/2018 at 8:30 AM in Department 65, Weingart, Gregory J, Presiding
Motion Hearing - **Denied**

08/23/2018 Minute Order

08/16/2018 Reply (in support of motion)
Filed by Respondent

08/16/2018 Declaration (gemma karapetyan)
Filed by Respondent

08/16/2018 Supplemental
Filed by Respondent

08/10/2018 Responsive Declaration
Filed by Petitioner

08/01/2018 at 8:30 AM in Department 2, Kaufman, Shelley, Presiding
Ex Parte Hearing - **Denied**

08/01/2018 Memorandum - Points and Authorities (in Support of Petitioner's Ex Parte Request for Order)
Filed by Petitioner

08/01/2018 Ex Parte - Application
Filed by Petitioner

08/01/2018 Minute Order

06/21/2018 Proof of Service

Filed by Respondent

06/21/2018 Motion (Notice of Motion and Motion to Reopen Discovery and for Sanctions)

Filed by Respondent

06/21/2018 Declaration

Filed by Respondent

06/21/2018 Declaration

Filed by Respondent

06/21/2018 Declaration

Filed by Respondent

05/25/2018 Notice ([REDACTED])

Filed by Respondent

05/23/2018 Notice (related case [REDACTED])

Filed by Respondent

05/23/2018 Notice (related case [REDACTED])

Filed by Respondent

05/10/2018 at 8:30 AM in Department D, Convey, Michael J., Presiding

Ex Parte Hearing - **Denied - Without Prejudice**

05/10/2018 Minute Order

05/04/2018 Supplemental (Declaration of [REDACTED] [REDACTED])

Filed by Petitioner

04/30/2018 at 8:30 AM in Department 2, Lewis, Thomas Trent, Presiding

Restraining Order Hearing - **Held - Continued, TRO Reissued**

04/30/2018 Minute Order

04/30/2018 Notice - Hearing & Order on Reissuance TRO (Form 116)

Filed by Petitioner

04/26/2018 Proof of Service (Civil Subpoena for Personal Appearance at the Trial Or Hearing)

Filed by Petitioner

04/26/2018 Miscellaneous (Notice of Unavailability of Witness Subpoenaed)

Filed by Attorney for Participant

04/24/2018 at 8:30 AM in Department F, Goldberg, Hank M., Presiding

Ex Parte Hearing - **Denied**

04/24/2018 Minute Order

04/24/2018 Opposition (to Petitioner's Ex Parte Application)

Filed by Other

04/24/2018 Ex Parte - Application (for an Order Compelling a Viewing of Surveillance Footage with an Expert, Further Production of Business Records, and to Add Amado Merano as an Additional Protected Person; Memorandum of Points and Authorities; Declaration of Amado Merano In Support Thereof)

Filed by Petitioner

04/19/2018 Declaration (of Eric Kennedy in Support of Respondent Curtis Olson's Request for Civil Harassment Restraining Orders)

Filed by Respondent

04/02/2018 at 8:30 AM in Department F, Goldberg, Hank M., Presiding

Motion Hearing - **Granted - In Part**

04/02/2018 Minute Order

03/23/2018 Objection (Evidentiary objections to declaration of [REDACTED] [REDACTED])

Filed by Witness

03/23/2018 Reply (To Petitioner's Opposition To Motion To Quash)

Filed by Witness

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03/22/2018 Reply (to LB Property Management Opposition to Petitioner's Motion for an Order Compelling Further Production of Business Records from LB Prpoerty Management)

Filed by Petitioner

03/20/2018 Opposition (to Motion to Quash Petitioner's Civil Subpoena for Personal Appearance at Trial or Hearing)

Filed by Petitioner

03/16/2018 Notice - Motion (to Quash Petitioner's Civil Subpoena for Personal Appearance at Trial or Hearing and Request for Attorney's Fees, Memorandum of Points, etc....)

Filed by Witness

03/16/2018 Objection (/Evidentiary to [REDACTED] Declaration)

Filed by Witness

03/16/2018 Opposition (to Pet's Motion for an Order Compelling Further Production of Business Records)

Filed by Witness

03/02/2018 Motion (For An Order Compelling Further Production Of Business Records)

Filed by Petitioner

02/14/2018 Substitution of Attorney

Filed by Petitioner

02/14/2018 Proof of Service (of subpoena for personal appearance)

Filed by Petitioner

01/23/2018 at 8:30 AM in Department F, Goldberg, Hank M., Presiding

Ex Parte Hearing - **Off Calendar - Case Settled**

01/23/2018 Ex Parte - Application

Filed by Petitioner

01/23/2018 Stipulation and Order

Filed by Petitioner

01/23/2018 Declaration - Ex Parte Notice (Notice Given)

Filed by Petitioner

01/23/2018 Notice - Hearing & Order on Reissuance TRO (Form 116)

Filed by Petitioner

01/23/2018 Minute Order

01/23/2018 Fee Waiver - Request - Waive Court Fees - Filed FW001

Filed by Petitioner

01/23/2018 Fee Waiver - Order on Court Fee Waiver - Granted FW003

Filed by Petitioner

01/23/2018 Proof of Service

Filed by Petitioner

01/23/2018 Request to Continue and Reissue TRO (Form 115)

Filed by Petitioner

01/19/2018 Substitution of Attorney

Filed by Petitioner

01/16/2018 at 8:30 AM in Department F, Goldberg, Hank M., Presiding

Motion Hearing - **Off Calendar - Request of Petitioner**

01/16/2018 Minute Order

01/03/2018 Proof of Service (served motion for order compelling production of business records)

Filed by Petitioner

12/08/2017 Motion (for order compelling production of business records)

Filed by Petitioner

12/04/2017 at 8:30 AM in Department F, Goldberg, Hank M., Presiding

Restraining Order Hearing - **Not Held - Continued by Petitioner**

12/04/2017 Request to Continue and Reissue TRO (Form 115)

Filed by Petitioner

12/04/2017 Notice - Hearing & Order on Reissuance TRO (Form 116)

Filed by Petitioner

12/04/2017 Minute Order

11/08/2017 at 8:30 AM in Department F

Restraining Order Hearing - **Not Held - Continued by Stipulation**

11/08/2017 Request to Continue and Reissue TRO (Form 115)

Filed by Respondent

11/08/2017 Notice - Hearing & Order on Reissuance TRO (Form 116)

Filed by Petitioner

11/08/2017 Minute Order

11/08/2017 Stipulation (to Continue Hearing)

Filed by Respondent

10/17/2017 at 8:30 AM in Department F, Breddan, Matthew A, Presiding

Restraining Order Hearing - **Held - Continued, TRO Reissued**

10/17/2017 Notice - Hearing & Order on Reissuance TRO (Form 116)

Filed by Petitioner

10/17/2017 Minute Order

10/17/2017 Request to Continue and Reissue TRO (Form 115)

Filed by Petitioner

10/17/2017 Substitution of Attorney

Filed by Petitioner

09/27/2017 at 8:30 AM in Department F, Kazadi, Michelle L, Presiding
Restraining Order Hearing - **Held - Continued, TRO Reissued**

09/27/2017 Stipulation - Judge Pro Tem/Referee (Michelle Kizadi)

Filed by Petitioner

09/27/2017 Notice - Hearing & Order on Reissuance TRO (Form 116)

Filed by Petitioner

09/27/2017 Proof of Service (served TRO)

Filed by Petitioner

09/27/2017 Request to Continue and Reissue TRO (Form 115)

Filed by Respondent

09/26/2017 Response - Civil Harassment

Filed by Respondent

09/26/2017 Declaration (of Dane Olson)

Filed by Respondent

09/26/2017 Declaration (of Curtis Olson)

Filed by Respondent

09/26/2017 Declaration (of Dylan Olson)

Filed by Respondent

09/14/2017 Proof of Service

Filed by Petitioner

09/06/2017 Declaration - Ex Parte Notice (No Notice Given)

Filed by Petitioner

09/06/2017 Civil Case Cover Sheet (Addendum and Statement of Location)

09/06/2017 Notice - Court Hearing (Form 109)

Filed by Petitioner

09/06/2017 Temporary Restraining Order (Form 110)

Filed by Petitioner

09/06/2017 Petition - Civil Harassment

Filed by Petitioner

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1 SUPERIOR COURT OF THE STATE OF CALIFORNIA

2 FOR THE COUNTY OF LOS ANGELES

3 DEPARTMENT NWD

HON. MICHAEL J. CONVEY, JUDGE

4 [REDACTED], AN INDIVIDUAL,)

5 PETITIONER,)

6 VS.)

CASE NO.

7 CURTIS OLSON, AN INDIVIDUAL,)

8 RESPONDENT.)

R/T [REDACTED]

9 _____)
10 AND RELATED ACTIONS.)

11 REPORTER'S TRANSCRIPT OF PROCEEDINGS

12 11/16/18

13
14
15 APPEARANCES:

16 FOR PETITIONER/
17 RESPONDENT

[REDACTED]:

BENJAMIN F. KANANI, ESQ.
8730 WILSHIRE BOULEVARD
SUITE 411
BEVERLY HILLS, CALIFORNIA 90211

18
19 FOR RESPONDENT/
20 PETITIONER
21 OLSON:

BUCHALTER
ERIC M. KENNEDY, ESQ.
1000 WILSHIRE BOULEVARD
SUITE 1500
LOS ANGELES, CALIFORNIA 90017

22 RYAN A. VOGT-LOWELL, ESQ.
23 1 MACARTHUR PLACE
24 SUITE 300
25 SANTA ANA, CALIFORNIA 92707

26
27
28 REPORTED BY:

MARLENE BURRIS, RPR, CSR #8424
OFFICIAL REPORTER

1 CASE NUMBER: [REDACTED] R/T [REDACTED]
2 CASE NAME: [REDACTED] V. OLSON
3 VAN NUYS, CALIFORNIA 11/16/18
4 DEPARTMENT NO. NWD HON. MICHAEL J. CONVEY, JUDGE
5 REPORTER: MARLENE BURRIS, CSR NO. 8424
6 TIME: 8:56 A.M.
7

8 APPEARANCES:

9 (AS HERETOFORE NOTED.)
10
11

12 **THE COURT:** BACK ON THE RECORD IN THE RESTRAINING
13 ORDER MATTERS. BOTH PARTIES ARE PRESENT AND COUNSEL FOR
14 BOTH PARTIES ARE PRESENT. WHERE DO WE GO NEXT ON THE
15 [REDACTED] CASE?

16 **MR. KANANI:** AT THIS POINT, WE HAD A FEW PRETRIAL
17 QUESTIONS TO CLARIFY. THE WITNESSES FOR TODAY ARE
18 MR. OLSON AND MS. [REDACTED]'S CASE-IN-CHIEF FOLLOWED BY
19 MS. [REDACTED] AT WHICH POINT WE HAVE NOT HEARD FROM
20 MR. MORENO. SO WE HAVE -- OTHER THAN THAT, WE JUST HAVE
21 POTENTIALLY FOUR WITNESSES ON REBUTTAL, ONE OF WHICH IS
22 NOT MR. ECONN. HE CAN BE EXCUSED. EACH OF THOSE
23 WITNESSES SHOULD BE FIVE TO TEN MINUTES. THEN THERE IS
24 MR. OLSON'S CASE-IN-CHIEF.

25 **THE COURT:** ALL RIGHT. ANYTHING ELSE PRELIMINARY?

26 **MR. KENNEDY:** YES, YOUR HONOR. WE HAVE ONE ISSUE.
27 WE WOULD LIKE TO MOVE UNDER EVIDENCE CODE 352 IN LIMINE
28 TO EXCLUDE ANY EVIDENCE OR TESTIMONY TODAY OF DOCUMENTS

1 THAT RELATE TO ALLEGATIONS THAT WERE MADE IN THE 2015
2 APPLICATION.

3 AS THE COURT HAS NOTED PREVIOUSLY, THIS
4 HEARING IS NOT MEANT TO BE A REDO OF THOSE ALLEGATIONS
5 WHICH WERE BROUGHT FOR HEARING AND WERE SETTLED NOR WAS
6 IT MEANT TO BE AN EFFORT TO TRY TO RE-LITIGATE THOSE
7 ALLEGATIONS IN THE CIVIL ACTIONS. WE BELIEVE THAT
8 TESTIMONY RELATING TO THE 2015 APPLICATION WOULD DO BOTH
9 OF THOSE THINGS. IT WOULD ALSO UNDULY WASTE VALUABLE
10 TIME AND RESOURCES OF THE COURT AND EXTEND THIS HEARING,
11 WHICH HAS BEEN LONG ENOUGH, EVEN LONGER.

12 **THE COURT:** THANK YOU. YOUR ARGUMENT AND
13 OPPOSITION, MR. KANANI.

14 **MR. KANANI:** WELL, WE HAVE NO PROBLEM CONFORMING
15 WITH THE COURT'S ORDER. IF THERE IS A DOCUMENT OR ISSUE
16 THAT WAS RE-LITIGATED, WE -- OF COURSE, THE COURT
17 EXCLUDED IT AS PREVIOUSLY STATED. I DON'T KNOW IF I
18 INTEND TO REALLY INTRODUCE TOO MANY DOCUMENTS THAT ARE
19 FILED IN THAT PREVIOUS RESTRAINING ORDER. I SHOULD NOT
20 INTRODUCE ANY AS THE COURT STATED PREVIOUSLY. WE'LL TAKE
21 ONE EXHIBIT AT A TIME. THE CONTENT OF WHAT HE'S
22 SUGGESTING IS IN LINE OF WHAT THE COURT ORDERED ON THE
23 FIRST DAY OF TRIAL.

24 **MR. KENNEDY:** WE'RE CERTAINLY NOT LIMITING --

25 **THE COURT:** HOLD ON. ANYTHING ELSE?

26 **MR. KANANI:** NO. WE HAVE SOME GENERAL OTHER
27 PRELIMINARY QUESTIONS BUT NOT ON THIS.

28 **THE COURT:** MR. KENNEDY, REPLY.

1 **MR. KENNEDY:** THANK YOU, YOUR HONOR.

2 WE'RE NOT LIMITING OUR REQUESTS TO
3 DOCUMENTS. WE'RE ASKING THAT ANY DOCUMENTS, ANY
4 TESTIMONY, ANY REFERENCE TO EVIDENCE THAT RELATES TO
5 ALLEGATIONS THAT WERE MADE IN THE 2015 APPLICATION BE
6 PROHIBITED NOW AT THE OUTSET RATHER THAN GOING CASE BY
7 CASE BY CASE WHICH DOES NOT ADDRESS THE ISSUE OF WASTING
8 THE COURT'S TIME NOR DOES IT ADDRESS THE OBVIOUS
9 PREJUDICE THAT WE'LL SUFFER IF WE'RE REQUIRED TO
10 RE-LITIGATE THESE ISSUES THAT HAVE BEEN ARGUED AND
11 SETTLED.

12 **THE COURT:** THE COURT'S RULING ON YOUR MOTION IN
13 LIMINE -- THIS IS THE RESPONDENT'S ORAL MOTION IN LIMINE
14 UNDER EVIDENCE CODE 352. I APPRECIATE THE ARGUMENTS ON
15 BOTH SIDES. I APPRECIATE THE LEGAL QUESTION THAT YOU
16 RAISE. THE COURT'S VIEW IS STILL NEUTRAL. THE COURT'S
17 VIEW IS NEUTRAL IN RECEIVING ALL OF THE EVIDENCE FROM
18 BOTH SIDES BEFORE IT MAKES ITS DECISION OR DECISIONS.
19 LET ME MAKE THAT ABUNDANTLY CLEAR TO EVERYBODY.

20 BY MY VERY NEXT COMMENTS, HOWEVER, I DO NOT
21 MEAN TO TELL YOU IF I HAVE ANY PREDILECTION OR
22 PREDISPOSITION TOWARD ANY ISSUE OR RULING. BUT I THOUGHT
23 THAT I MADE IT VERY CLEAR AT THE BEGINNING OF THE CASE
24 THAT WE ARE NOT TRYING THE 2015 RESTRAINING ORDER BUT
25 THAT I MIGHT HEAR SOMETHING ABOUT THAT AS IT MAY LEND
26 SOME FACTUAL CONTEXT TO THE EVENTS ALLEGED IN THE INSTANT
27 RESTRAINING ORDER APPLICATIONS, BOTH OF THEM.

28 TO THAT EXTENT, THE COURT MAY HAVE A FACTUAL

1 CONTEXT OR A FOUNDATIONAL ELEMENT TO DRAW FROM IN THAT
2 EVIDENCE. HEARING IT, ADMITTING IT DOES NOT MAKE IT THE
3 SUBJECT OF A RESTRAINING ORDER. I MADE IT ALSO, I
4 BELIEVE, ABUNDANTLY CLEAR THAT REQUESTS FOR RELIEF
5 ARISING OUT OF EVENTS THAT OCCURRED PRIOR TO THE
6 SETTLEMENT OF THE PREVIOUSLY RESTRAINING ORDER ARE NOT
7 GOING TO BE AND SHALL NOT BE THE SUBJECT OF A RESTRAINING
8 ORDER TODAY.

9 THIS COURT IS EXPERIENCED ENOUGH AS A TRIER
10 OF FACT IN CIVIL HARASSMENT CASES AND IN THE FAMILY LAW
11 AND CIVIL HARASSMENT ASSIGNMENT OVER THESE MANY YEARS TO
12 BE ABLE TO VIEW THE EVIDENCE, TO SEPARATE THAT WHICH
13 MIGHT BE ARGUED IN FRONT OF A JURY TO BE PREJUDICIAL OR
14 CONFUSING AND AVOID THAT CONFUSION IN ITS MIND AS IT
15 MAKES THAT DECISION.

16 I INVITE COUNSEL ON BOTH SIDES TO TELL ME
17 HOW MUCH WEIGHT, IF ANY, I SHOULD GIVE THAT EVIDENCE OF
18 THIS CHARACTER AND VARIETY, LITTLE, NONE, OR A GREAT DEAL
19 OR SOMEWHERE ELSE. AS FOR THE PREJUDICE, I HAVE JUST
20 ADDRESSED THAT. MY ABILITY TO SEPARATE OUT WHAT I HAVE
21 JUST SAID I WOULD DO IS PARAMOUNT AND I KEEP THAT IN MIND
22 AS I HEAR ALL OF THE EVIDENCE IN THIS CASE. SO I DON'T
23 FIND PREJUDICE TO THE RESPONDENT MR. OLSON BY MY ALLOWING
24 EVIDENCE IN THIS FASHION MAKING IT ABUNDANTLY CLEAR THAT
25 A RESTRAINING ORDER SHALL NOT BE BASED UPON THAT WHICH
26 WAS PREVIOUSLY SETTLED.

27 AS FOR CONSUMPTION OF TIME, THAT IS AN ISSUE
28 THAT PRESENTS ITSELF AND IT IS CORRECTABLE, IF YOU WILL,

1 OR REMEDIATED BY THOSE PROVISIONS OF CODE OF CIVIL
2 PROCEDURE SECTION 527.6 SPECIFICALLY (S) THAT ALLOW FOR
3 ATTORNEYS' FEES TO THE PREVAILING PARTY. BEYOND THAT,
4 THE PARTIES HAVE A RIGHT TO HAVE THEIR CASE HEARD IN
5 COURT. THE CASE WAS ASSIGNED TO THIS DEPARTMENT BY THE
6 SUPERVISING JUDGE OF FAMILY LAW IN DEPARTMENT TWO FOR A
7 FOUR-DAY HEARING. AND WE'RE IN THE THIRD DAY OF THAT
8 NOW. WE HAVE MONDAY THE 19TH. AND I EXPECT WE'LL FINISH
9 BY THEN ON TIME. AND AS YOU SEE, I DO KEEP THE TIME
10 HERE. WE'RE NOT WASTING TIME UNNECESSARILY ON YOUR
11 PRESENTATION. AND YOUR PRESENTATIONS HAVE ACTUALLY COME
12 IN A SHADE UNDER YOUR ESTIMATES WHICH IS APPRECIATED BY
13 THE COURT. NEVERTHELESS, I DENY THE ORAL 352 MOTION.
14 THE MOTION IN LIMINE IS DENIED.

15 **MR. KENNEDY:** THANK YOU, YOUR HONOR.

16 **THE COURT:** CALL YOUR NEXT WITNESS.

17 **MR. KANANI:** A FEW PRELIMINARY QUESTIONS OR ISSUES
18 TO DEAL WITH FIRST.

19 **THE COURT:** OKAY.

20 **MR. KANANI:** FIRST, WE'D LIKE TO EXCUSE MR. ECONN.
21 WE HAVE NO INTENTION TO CALL HIM.

22 **THE COURT:** DO YOU INTEND TO EXCUSE MR. ECONN AT
23 THIS TIME?

24 **MR. KENNEDY:** YES.

25 **THE COURT:** SO MR. ECONN IS ORDERED EXCUSED.

26 MS. BARKER, YOU'RE FREE TO GO. FREE TO
27 STAY. PLEASE ADVISE YOUR CLIENT HE'S EXCUSED. HE WON'T
28 BE CALLED BACK BY ANY PARTY FOR ANY PURPOSE.

1 **MS. BARKER:** I APPRECIATE THAT, YOUR HONOR.

2 **MR. KANANI:** WE JUST WANTED TO KNOW IF THE COURT
3 INTENDS TO HEAR REBUTTAL WITNESSES AFTER BOTH CASES IN
4 CHIEF HAVE BEEN PRESENTED OR --

5 **THE COURT:** YES.

6 **MR. KANANI:** SOME CLARIFICATION ON AUDIO
7 TRANSCRIPTIONS. WE HAVE TWO RECORDINGS WHICH ARE
8 CURRENTLY BEING TRANSCRIBED. WE'RE HOPING THEY WILL BE
9 DONE BY THE AFTERNOON. MOST LIKELY BY MONDAY MORNING.
10 ARE THEY SIMPLY PRESENTED OR SOMEONE WITH CERTIFICATION
11 OR SOMEONE TO AUTHENTICATE THEM?

12 **THE COURT:** IS THE AUDIO ONE OF THE EXHIBITS?

13 **MR. KANANI:** ONE OF THEM IS AN EXHIBIT MARKED AS
14 EXHIBIT 1. THE OTHER IS NOT.

15 **THE COURT:** THE OTHER AUDIO, IF IT'S PART OF YOUR
16 CASE-IN-CHIEF, YOU'RE AUGMENTING THE EXHIBIT LIST IN THE
17 MIDDLE OF THE TRIAL WHICH I SAID YOU CANNOT DO. UNLESS
18 IT'S FOR IMPEACHMENT OR REBUTTAL, I WON'T EVEN ALLOW IT
19 TO BE MARKED.

20 **MR. KANANI:** THAT IS THE ONLY REASON.

21 **THE COURT:** THAT IS UNFAIR SURPRISE. THAT IS
22 PREJUDICIAL TO THE OTHER SIDE UNLESS IT'S TRULY OR
23 IMPEACHMENT OR REBUTTAL.

24 **MR. KANANI:** YES.

25 **THE COURT:** CALIFORNIA RULE OF COURT 2.1040 IS THE
26 RULE THAT GUIDES ELECTRONIC RECORDINGS. YOU'RE REQUIRED
27 TO HAVE THE TRANSCRIPT HERE. YOU HAVE A SAFE HARBOR
28 UNDER THAT RULE TO PROVIDE THE TRANSCRIPT LATER. THAT

1 DOES NOT EXCUSE THE REQUIREMENT OF THE PROHIBITION
2 AGAINST AUGMENTING YOUR CASE-IN-CHIEF IN THE MIDDLE OF
3 THE CASE-IN-CHIEF. THE COURT REQUIRED THAT ALL EXHIBITS
4 BE TURNED OVER SIX MONTHS AGO. AND THAT SHOULD HAVE BEEN
5 DONE SIX MONTHS AGO. UNLESS IT'S TRULY IMPEACHMENT OR
6 REBUTTAL, I WON'T ALLOW IT. I'M VERY FIRM WITH THAT RULE
7 BECAUSE THAT DOES UNDULY CONSUME TIME AND IT'S UNFAIR
8 SURPRISE. ANYTHING ELSE?

9 **MR. KANANI:** THE ONLY OTHER ISSUE IS GIVEN THAT WE
10 HAVE NOT HEARD FROM MR. MORENO, WE HAVE A FEW
11 DECLARATIONS FROM HIM WHICH HAVE BEEN MARKED AND HAVE
12 BEEN PROVIDED TO OPPOSING COUNSEL.

13 **THE COURT:** ARE THEY MARKED AS EXHIBITS?

14 **MR. KANANI:** YES, THEY ARE ALL MARKED AS A SINGLE
15 EXHIBIT. I BELIEVE IT'S EXHIBIT -- PETITIONER'S EXHIBIT
16 14, THREE SEPARATE DECLARATIONS.

17 **THE COURT:** ARE YOU MOVING THOSE INTO EVIDENCE?

18 **MR. KANANI:** WE REQUEST THAT THEY BE MOVED INTO
19 EVIDENCE.

20 **THE COURT:** IS THERE ANY OBJECTION?

21 **MR. KENNEDY:** YES, YOUR HONOR. THESE ARE HEARSAY.
22 LACKS FOUNDATION. NOT AUTHENTIC. NO OPPORTUNITY TO
23 CROSS-EXAMINE. THERE'S NO EXCEPTION.

24 **THE COURT:** THERE IS AN EXCEPTION. THERE'S A
25 CASE -- CIVIL HARASSMENT CASE THAT ALLOWS HEARSAY. AND I
26 DON'T HAVE THE CITE FOR YOU. BUT IT IS A DECIDED CASE
27 LAW THAT HEARSAY EVIDENCE IS ADMISSIBLE IN A CIVIL
28 HARASSMENT HEARING. I WILL OVERRULE THE OBJECTION, AND I

1 WILL CONSIDER EXHIBIT 14 FOR WHATEVER IT'S WORTH.

2 THE FACT THAT THE MAN IS NOT HERE TO BE
3 CROSS-EXAMINED AFTER A SUBPOENA WAS SERVED ON HIM AND AN
4 ORDER WAS DIRECTED TO HIM TO APPEAR AND A BENCH WARRANT
5 ISSUED FOR HIM IS SOMETHING THAT IS IN THE RECORD ALREADY
6 AND CAN BE ARGUED FOR THE WEIGHT THAT I MIGHT GIVE THAT
7 EVIDENCE AS WELL.

8 **MR. KENNEDY:** THANK YOU, YOUR HONOR.

9 **THE COURT:** EXHIBIT 14 IS ADMITTED.

10
11 (PETITIONER'S EXHIBIT 14 WAS RECEIVED INTO
12 EVIDENCE.)

13
14 **THE COURT:** ANYTHING ELSE?

15 **MR. KANANI:** THAT IS ALL FOR NOW.

16 **THE COURT:** CALL YOUR NEXT WITNESS.

17 **MR. KANANI:** PETITIONER CALLS MR. OLSON.

18 **THE COURT:** MR. OLSON, UNDER EVIDENCE CODE 776 IF
19 YOU COME ON UP HERE TO THE WITNESS STAND.

20 **MR. KENNEDY:** YOUR HONOR, RESPECTFULLY REQUEST THAT
21 MR. KANANI BE REMINDED THAT HE HAS A HARD TIME HEARING.
22 HE WEARS TWO HEARING AIDS.

23
24 **CURTIS OLSON,**

25 CALLED AS A WITNESS BY THE PETITIONER UNDER
26 EVIDENCE CODE 776, WAS SWORN AND TESTIFIED AS
27 FOLLOWS:

28 ///

1 **THE COURT CLERK:** YOU DO SOLEMNLY STATE THAT THE
2 TESTIMONY YOU MAY GIVE IN THE CAUSE NOW PENDING BEFORE
3 THIS COURT SHALL BE THE TRUTH, THE WHOLE TRUTH, AND
4 NOTHING BUT THE TRUTH, SO HELP YOU GOD?

5 **THE WITNESS:** YES, I DO.

6 **THE COURT CLERK:** PLEASE BE SEATED.

7 PLEASE STATE AND SPELL YOUR FIRST AND LAST
8 NAME FOR THE RECORD.

9 **THE WITNESS:** CURTIS OLSON, C-U-R-T-I-S O-L-S-O-N.

10 **THE COURT:** THANK YOU.

11 MR. KANANI, PLEASE REMEMBER TO SPEAK LOUD
12 AND CLEAR SO THAT MR. OLSON CAN HEAR YOU ASKING
13 QUESTIONS. YOU MAY PROCEED WITH YOUR DIRECT UNDER
14 EVIDENCE CODE 776.

15
16 **DIRECT EXAMINATION**

17 **BY MR. KANANI:**

18 **Q** THANK YOU, MR. OLSON. I WANTED TO START
19 WITH A GENERAL HISTORY VERY BRIEFLY WITHOUT USING UP MORE
20 OF THE COURT'S TIME THAN NECESSARY. DO YOU REMEMBER WHEN
21 YOU FIRST MET MS. ██████████?

22 **A** APPROXIMATELY -- APPROXIMATELY 2002.

23 **Q** AND DO YOU REMEMBER HOW YOU WERE FIRST
24 INFORMED OF THE PROPERTY KNOWN AS ██████████

25 **A** YES, I DO.

26 **Q** CAN YOU DESCRIBE TO THE COURT HOW YOU FIRST
27 BECAME AWARE OF THAT?

28 **A** I RECEIVED A PHONE CALL FROM A FRIEND OF

1 MINE SAYING THAT A MAN BY THE NAME OF KENNY HAD A PROJECT
2 UP IN [REDACTED] TO LOOK AT EIGHT APARTMENTS AND I DROVE
3 UP AND TOOK A LOOK AT IT.

4 Q PRIOR TO HEARING ABOUT IT FROM KENNY, DID
5 YOU EVER HEAR ABOUT IT FROM MS. [REDACTED]?

6 A NO.

7 Q HOW IS IT THAT YOU AND MS. [REDACTED] ENDED
8 UP -- WELL, STRIKE THAT. WITHDRAWN AND REPHRASE.

9 WHEN YOU PURCHASED [REDACTED] WAS
10 MS. [REDACTED] A PARTNER OR INVOLVED AS A JOINT VENTURER IN
11 ANY WAY?

12 A NO.

13 Q WAS SHE ON THE PAPERWORK OR WAS SHE INVOLVED
14 IN THE PURCHASING OF THE TRANSACTION AT ALL?

15 A YES.

16 MR. KENNEDY: VAGUE AND AMBIGUOUS.

17 THE COURT: OVERRULED. THE ANSWER WILL STAND.

18 MR. KANANI: I DID NOT HEAR THE ANSWER.

19 THE COURT: YES.

20 BY MR. KANANI:

21 Q WHAT WAS HER ROLE IN THIS TRANSACTION?

22 A SHE HAD THE CONDO -- CAN I REFER TO IT AS
23 [REDACTED]?

24 Q YES.

25 A SHE HAD [REDACTED] UNDER CONTRACT TO PURCHASE.

26 Q MEANING -- CAN YOU DESCRIBE SHE HAD A UNIT
27 UNDER CONTRACT TO PURCHASE?

28 A IT WAS AN EIGHT APARTMENT UNITS. NOT A

1 CONDO. AND SHE HAD THE ENTIRE EIGHT UNITS UNDER CONTRACT
2 TO PURCHASE.

3 Q BUT SHE WAS UNABLE TO PURCHASE -- SHE DID
4 NOT HAVE THE FUNDS TO COME UP WITH THE MONEY TO PURCHASE?

5 A THAT IS MY ASSUMPTION.

6 Q ARE YOU THE ONE WHO PROVIDED THE MONEY TO
7 ULTIMATELY PURCHASE [REDACTED]?

8 A AFTER SOME THINGS THAT WENT ON, I ULTIMATELY
9 WAS THE ONE.

10 Q DID YOU PURCHASE IT PERSONALLY OR THROUGH A
11 BUSINESS ENTITY?

12 MR. KENNEDY: OBJECTION. RELEVANCE.

13 THE COURT: SUSTAINED. LET'S MOVE ON.

14 BY MR. KANANI:

15 Q MR. OLSON, ARE YOU THE PRESIDENT OR CEO OF
16 NEXUS DEVELOPMENT?

17 MR. KENNEDY: OBJECTION. RELEVANCE.

18 THE COURT: SUSTAINED. MOVE ON.

19 BY MR. KANANI:

20 Q I WOULD LIKE TO ASK YOU ABOUT A POTENTIAL
21 CONVERSATION THAT TOOK PLACE IN 2005 AS YOU HEARD ME ASK
22 PREVIOUS WITNESSES.

23 WERE YOU LIVING AT [REDACTED] IN 2005?

24 MR. KENNEDY: OBJECTION. RELEVANCE.

25 THE COURT: SUSTAINED. GET TO THE POINT. IF IT'S
26 IN 2005, THEN IT MUST DIRECTLY RELATE TO THE SERIES OF
27 EVENTS OR OCCURRENCES THAT YOU ALLEGE ARE PART OF THE
28 INSTANT RESTRAINING ORDER AND NOT ANYTHING ELSE. THAT IS

1 THE COURT'S STANDING ORDER FROM THE BEGINNING OF THIS
2 CASE.

3 **BY MR. KANANI:**

4 Q DID YOU EVER HAVE A CONVERSATION WITH ANYONE
5 IN WHICH YOU DIRECTED ANOTHER INDIVIDUAL TO REFER TO
6 MS. [REDACTED] AS A CON ARTIST OR A PROSTITUTE AT ANY TIME?

7 A NO.

8 Q DID ANYONE HAVE A CONVERSATION WITH YOU IN
9 WHICH THEY DIRECTED YOU TO DO WHAT I JUST DESCRIBED?

10 A CAN YOU RESTATE THAT, PLEASE?

11 Q DID ANYONE HAVE A CONVERSATION -- DID YOU
12 HAVE A CONVERSATION WITH ANYONE IN WHICH THEY DIRECTED
13 YOU TO REFER TO MS. [REDACTED] AS A CON ARTIST OR A
14 PROSTITUTE?

15 A NO.

16 Q MR. OLSON, DID YOU EVER ATTEMPT TO PURCHASE
17 MS. [REDACTED]'S UNIT FROM HER?

18 A I'M SORRY?

19 **MR. KENNEDY:** OBJECTION. RELEVANCE.

20 **THE COURT:** THE OBJECTION ON RELEVANCE IS
21 OVERRULED. PLEASE REPEAT THE QUESTION.

22 **BY MR. KANANI:**

23 Q DID YOU EVER ATTEMPT TO PURCHASE
24 MS. [REDACTED]'S UNIT AT [REDACTED] FROM HER?

25 A I NEVER DID.

26 Q DID ANYONE AT NEXUS DEVELOPMENT EVER ATTEMPT
27 TO DO SO?

28 A NO, NOT AT NEXUS.

1 **Q** DID ANYONE WORKING ON YOUR BEHALF EVER
2 ATTEMPTED TO DO SO?

3 **A** NEVER ON MY BEHALF.

4 **Q** DID AN INDIVIDUAL -- ARE YOU AWARE OF AN
5 INDIVIDUAL NAMED CORY ALDER?

6 **A** YES.

7 **Q** DO YOU KNOW IF HE ATTEMPTED TO PURCHASE THE
8 UNIT FROM MS. [REDACTED] ?

9 **MR. KENNEDY:** OBJECTION. CALLS FOR SPECULATION.
10 RELEVANCE.

11 **THE COURT:** OVERRULED. GO AHEAD.

12 **THE WITNESS:** HE'S PRESIDENT OF MY COMPANY. I, YOU
13 KNOW, 2005 I DON'T KNOW IF HE DID OR NOT.

14 **BY MR. KANANI:**

15 **Q** YOU SAID, "MY COMPANY." CAN YOU TELL ME
16 WHICH COMPANY THAT IS.

17 **A** NEXUS DEVELOPMENT.

18 **Q** DID ANYONE ELSE AT YOUR COMPANY EVER ATTEMPT
19 TO PURCHASE THE UNIT BESIDES MR. ALDER THAT YOU'RE AWARE
20 OF?

21 **A** I'M NOT AWARE OF IT. I HAVE PEOPLE THAT
22 WORK FOR ME AND HAVE A LOT -- LITTLE EXPERIENCES THAT
23 WERE GOING ON, YOU KNOW. SO I DON'T KNOW.

24 **Q** I DON'T WANT YOU TO GUESS. YOU CAN SAY WHAT
25 YOU'RE AWARE OF. THAT'S ALL WE'RE ENTITLED TO. YOU'RE
26 AWARE THERE'S A VACANT LOT NEXT DOOR TO [REDACTED]

27 **A** VERY WELL, YES.

28 **Q** DO YOU -- ARE YOU AWARE OF HOW THAT LOT IS

1 CURRENTLY ZONED?

2 **MR. KENNEDY:** OBJECTION. RELEVANCE.

3 **THE COURT:** SUSTAINED.

4 **BY MR. KANANI:**

5 **Q** MR. OLSON, YOU WERE THE PRESIDENT OF THE
6 BOARD OF THE HOMEOWNER'S ASSOCIATION AT [REDACTED]
7 AT ONE POINT?

8 **A** YES.

9 **Q** ARE YOU CURRENTLY THE BOARD PRESIDENT?

10 **A** NO.

11 **Q** DO YOU REMEMBER WHEN YOU WERE THE BOARD
12 PRESIDENT?

13 **A** NOT EXACT YEARS, NO.

14 **Q** DO YOU REMEMBER FOR HOW LONG YOU WERE THE
15 BOARD PRESIDENT?

16 **A** NO.

17 **Q** ARE YOU CURRENTLY A MEMBER OF THE BOARD?

18 **A** NO.

19 **Q** DO YOU KNOW WHO THE MEMBERS OF THE BOARD
20 ARE?

21 **A** FOR SURE I KNOW ONE. SCOTT BURNHAM
22 (PHONETICALLY).

23 **Q** DO YOU KNOW ANY OTHERS?

24 **A** I'M NOT SURE WHO IS ON THE BOARD RIGHT NOW.

25 **Q** DO YOU REMEMBER WHO WAS A MEMBER OF THE
26 BOARD WHEN YOU WERE A MEMBER AS WELL?

27 **A** I THINK FOR A SHORT PERIOD DON ECONN WAS.
28 SCOTT BURNHAM I THINK AT ONE TIME WHEN I WAS ON THE

1 BOARD.

2 Q THAT IS ALL YOU CAN REMEMBER AS YOU SIT HERE
3 TODAY; CORRECT?

4 A YES.

5 Q WITHOUT DESCRIBING THE DETAILS OR GETTING
6 INTO ANY OF THE LEGAL ASPECTS, DO YOU REMEMBER THE
7 HOMEOWNER'S ASSOCIATION HAVING A NUMBER OF DISPUTES IN
8 THE PAST OR CURRENTLY WITH MS. [REDACTED]?

9 A YES.

10 Q ARE YOU PERSONALLY INVOLVED IN ANY OF THESE
11 DISPUTES?

12 A REPHRASE YOUR QUESTION.

13 Q I DON'T BELIEVE I HAVE TO UNLESS THERE'S AN
14 OBJECTION.

15 **THE COURT:** DO YOU UNDERSTAND THE QUESTION?

16 **THE WITNESS:** I DO NOT UNDERSTAND THE QUESTION.

17 **THE COURT:** PLEASE REPHRASE IT.

18 **BY MR. KANANI:**

19 Q OF THOSE DISPUTES YOU'RE AWARE OF BETWEEN
20 THE HOMEOWNER'S ASSOCIATION AND MS. [REDACTED], ARE YOU
21 PERSONALLY AS AN INDIVIDUAL INVOLVED IN ANY WAY?

22 **MR. KENNEDY:** OBJECTION. ASSUMES FACTS NOT IN
23 EVIDENCE.

24 **THE COURT:** OVERRULED. GO AHEAD.

25 **THE WITNESS:** I'M TRYING TO UNDERSTAND.

26 **THE COURT:** ARE YOU INVOLVED IN ANY DISPUTES WITH
27 MS. [REDACTED]?

28 **THE WITNESS:** REFERRING TO THE CONDO ASSOCIATION HE

1 SAID.

2 **THE COURT:** YES. VERY SIMPLE QUESTION.

3 **THE WITNESS:** NO.

4 **THE COURT:** THANK YOU.

5 **BY MR. KANANI:**

6 **Q** MR. OLSON, I DON'T WANT TO LITIGATE ANYTHING
7 FROM 2015, AND I'M GOING TO TRY VERY HARD TO COMPLY WITH
8 THE COURT ORDERS HERE, BUT I WILL ASK ONE QUESTION.

9 **THE COURT:** I WILL STRIKE THAT FROM THE RECORD.
10 YOU'RE NOT ALLOWED TO DO THAT. I'VE SAID MY ORDER.
11 YOU'RE NOT ALLOWED TO COMMENT ON MY ORDER.

12 **MR. KANANI:** I APOLOGIZE, YOUR HONOR.

13 **THE COURT:** DON'T DO IT. IT'S DISRESPECTFUL TO THE
14 COURT'S ORDER. YOU ARE REQUIRED TO FOLLOW IT. GET TO
15 THE POINT FOR THIS CASE NOW.

16 **BY MR. KANANI:**

17 **Q** AT ANY POINT, ARE YOU AWARE OF ANYONE WHO
18 HAS BEEN PEEPING ON MS. [REDACTED] INSIDE HER UNIT?

19 **A** NO.

20 **Q** DID YOU EVER DIRECT ANYONE TO TAKE PICTURES
21 OF MS. [REDACTED] INSIDE HER UNIT?

22 **A** NO.

23 **Q** ARE YOU AWARE OF MS. [REDACTED]'S COMPLAINTS
24 THAT SOME INDIVIDUALS AT [REDACTED] HAVE BEEN SPYING
25 ON HER OR SURVEILLING HER?

26 **A** OF COURSE I'M AWARE OF IT.

27 **Q** ARE YOU FAMILIAR WITH ANY OF THE INDIVIDUALS
28 WHO SHE BELIEVES HAVE BEEN SPYING ON HER OR SURVEILLING

1 HER?

2 **A** ONE MORE TIME ON THAT QUESTION.

3 **Q** ARE YOU FAMILIAR OR AWARE OF ANY OF THE
4 INDIVIDUALS, THE ACTUAL PEOPLE, WHO SHE BELIEVES ARE
5 SURVEILLING OR SPYING ON HER?

6 **A** YES. I LISTEN TO IT HERE IN COURT.

7 **Q** OTHER THAN -- PRIOR TO THIS COURT
8 PROCEEDING, HAD YOU MET ANY OF THE INDIVIDUALS THAT
9 MS. [REDACTED] BELIEVES HAVE BEEN SURVEILLING HER?

10 **A** I KNOW --

11 **MR. KENNEDY:** OBJECTION.

12 **THE WITNESS:** -- FEDER.

13 **MR. KENNEDY:** LACKS FOUNDATION. CALLS FOR
14 SPECULATION.

15 **THE COURT:** SUSTAINED. REPHRASE THE QUESTION.

16 **BY MR. KANANI:**

17 **Q** PRIOR TO THESE COURT PROCEEDINGS, DID YOU
18 EVER NOTICE ANYONE STATIONED OUTSIDE OF [REDACTED]
19 FOR HOURS AT A TIME?

20 **A** NO.

21 **Q** DID YOU EVER NOTICE INDIVIDUALS WALKING
22 AROUND THE UNIT BUT NOT SEEMING TO HAVE ANY PARTICULAR
23 PURPOSE TO BE THERE?

24 **A** NO, NEVER.

25 **Q** DID YOU EVER SEE ANY INDIVIDUALS -- I'M
26 SORRY. STRIKE THAT. REPHRASE.

27 THERE IS A HOTEL ACROSS THE STREET FROM
28 [REDACTED] CALLED THE [REDACTED] HOTEL.

1 ARE YOU AWARE OF THIS HOTEL, MR. OLSON?

2 A YES.

3 Q THERE'S A CAFÉ INSIDE IT WHICH I REFERRED TO
4 PREVIOUSLY CALLED ██████████ CAFÉ. YOU'RE AWARE OF THIS
5 CAFÉ?

6 A YES.

7 Q HAVE YOU EVER SEEN ANY MEN DRESSED IN BLACK
8 ATTEND OR BE PRESENT AT THIS CAFÉ WHILE WERE YOU THERE?

9 A I REALLY HAVE NOT STUDIED THE OUTFITS. SO I
10 CAN'T REALLY RESPOND TO YOU.

11 Q DO YOU EVER GO TO THE CAFÉ ON YOUR OWN?

12 A QUITE OFTEN.

13 Q DID YOU EVER GO WITH INDIVIDUALS WHO WERE,
14 YOU KNOW, HIRED BY YOU AND DRESSED IN BLACK TO LOOK FOR
15 MS. ██████████?

16 A ABSOLUTELY NOT.

17 Q DID YOU EVER GO TO THE CAFÉ WITH ANYONE WHO
18 WAS EITHER HIRED BY YOU OR WORKING WITH YOU TO LOOK FOR
19 MS. ██████████?

20 A NEVER.

21 Q DID YOU EVER GO TO THE CAFÉ WITH DOUG ECONN?

22 A YES.

23 Q DID YOU EVER GO TO THE CAFÉ WITH AN
24 INDIVIDUAL -- I'M SORRY. STRIKE THAT.

25 DID YOU EVER DIRECT ANYONE ELSE TO GO TO THE
26 CAFÉ ON YOUR BEHALF TO LOOK FOR MS. ██████████?

27 A NEVER.

28 Q WHEN YOU WOULD GO TO THE CAFÉ, DO YOU

1 REMEMBER -- I'M SORRY. I'LL REPHRASE THAT.

2 WHEN YOU WOULD GO TO THE CAFÉ, WOULD YOU
3 NORMALLY GO ON YOUR OWN OR WOULD YOU GO WITH A FRIEND OR
4 FAMILY MEMBER?

5 **A** MOST OF THE TIME WITH SOMEONE ELSE.

6 **Q** WOULD YOU EVER GO WITH SOMEONE WHO WAS
7 WORKING FOR YOU?

8 **A** NO. NO.

9 **Q** WHEN YOU AT THE CAFÉ -- I'M SORRY. I'LL
10 REPHRASE THAT.

11 AT ANY POINT WHEN YOU HAVE GONE TO THE CAFÉ,
12 DID YOU EVER MEET AN INDIVIDUAL NAMED AMADO MORENO?

13 **A** I DON'T KNOW. I COULDN'T PICK HIM OUT OF
14 THE CROWD. I DON'T KNOW WHO HE IS. I WAS GOING TO
15 SPECULATE BUT I WON'T.

16 **Q** I'LL REPHRASE. DO YOU KNOW IF YOU HAVE EVER
17 MET AN INDIVIDUAL NAMED AMADO MORENO?

18 **A** I DO NOT KNOW.

19 **Q** DO YOU KNOW WHO MR. MORENO IS?

20 **A** HE'S THE MAN IN BLACK STORY. THAT'S WHAT I
21 KNOW.

22 **Q** DO YOU KNOW WHERE HE WORKS OR WHAT HE DOES
23 FOR A LIVING?

24 **A** THE ONLY THING I KNOW IS WHAT YOU GUYS WROTE
25 ON THAT DECLARATION THAT SAYS HE WORKS THERE.

26 **Q** SO BESIDES WHAT'S BEEN INCLUDED IN THIS
27 PROCEEDING, YOU HAVE NO KNOWLEDGE OF MR. MORENO?

28 **A** MAKE IT CLEAR. I DO NOT KNOW WHO THE MAN

1 IS. IF I SEEN HIM WALK IN HERE, I WOULDN'T KNOW WHO HE
2 IS.

3 Q HAVE YOU EVER HIRED BODYGUARDS TO PROTECT
4 YOURSELF, MR. OLSON?

5 A NO, NEVER.

6 Q HAVE YOU EVER HIRED PRIVATE DETECTIVES --

7 A NO.

8 Q -- TO WORK ON YOUR BEHALF?

9 A NO.

10 Q I'LL ASK SOME GENERAL QUESTIONS ABOUT --
11 SORRY. I WON'T INTRODUCE THIS.

12 WHEN YOU WERE A MEMBER OF THE BOARD, DID YOU
13 EVER REQUEST THAT SECURITY CAMERAS BE PLACED AT [REDACTED]

14 [REDACTED]

15 A I KNOW THEY WERE PLACED THERE A FEW YEARS
16 AGO. I DON'T THINK I WAS ON THE BOARD WHEN IT HAPPENED.
17 I'M NOT 100 PERCENT SURE.

18 Q OKAY. DO YOU REMEMBER THE MONTH IN WHICH
19 THEY WERE INSTALLED?

20 A NO.

21 Q OR FIRST PUT IN?

22 A NO.

23 Q DO YOU REMEMBER WHO REQUESTED THAT THEY BE
24 ORIGINALLY INSTALLED?

25 A I DO NOT.

26 Q DO YOU REMEMBER WHY OR --

27 A YOUR HONOR, THE LADY IS MAKING FACES AT ME
28 AND STUFF. IT'S GETTING OLD.

1 **THE COURT:** THE PARTIES ARE ADMONISHED THAT
2 NONVERBAL EXPRESSIONS IN COURT ARE VIOLATING THE COURT'S
3 ORDER AT THE BEGINNING OF THIS CASE. DISRESPECTFUL.
4 UNCIVIL. IT'S ORDERED TO STOP. IF IT'S SEEN AGAIN, IT
5 CAN HAVE SANCTION CONSEQUENCES.

6 PROCEED.

7 **MR. KANANI:** I'M SORRY.

8 **THE COURT:** YOU WANT YOUR LAST QUESTION BACK?

9 **MR. KANANI:** THAT WOULD BE HELPFUL, YOUR HONOR.

10
11 (THE RECORD IS READ.)

12
13 **BY MR. KANANI:**

14 **Q** DO YOU REMEMBER WHY OR WHAT WAS THE BASIS
15 FOR THE SECURITY CAMERAS TO BE INSTALLED IN THE FIRST
16 PLACE?

17 **A** I THINK IN GENERAL WE HAD ALL SORTS OF
18 STRANGERS GOING IN AND OUT OF THE PROPERTY AND EVERYONE
19 FELT WE NEEDED SECURITY.

20 **Q** WHEN YOU SAY, "EVERYONE," ARE YOU REFERRING
21 TO THE BOARD MEMBERS?

22 **A** I THINK JUST GENERAL CONSENSUS OF THE PEOPLE
23 THAT OWNED UNITS THERE WHETHER BOARD MEMBER OR NOT BOARD
24 MEMBER.

25 **Q** DO YOU KNOW ALL OF THE OWNERS AT [REDACTED]
26 [REDACTED] OR -- REPHRASE THAT. WITHDRAW AND ASK A
27 DIFFERENT QUESTION.

28 HOW MANY OWNERS ARE THERE AT [REDACTED]

1 [REDACTED]?

2 **A** THERE ARE TWO OWNERS THAT OWN TWO. THAT IS
3 TWO. THAT WOULD LEAVE FOUR LEFT. THERE ARE SIX OWNERS.

4 **Q** AND HOW MANY UNITS DO YOU OWN?

5 **A** I OWN ONE UNIT.

6 **Q** AND DID YOU OWN MORE THAN ONE AT SOME POINT?

7 **A** AT DIFFERENT TIMES, I OWNED ALL OF THEM.

8 **Q** AND YOU WERE RESPONSIBLE FOR SELLING THE
9 UNITS AT SOME POINT IF YOU OWNED ALL OF THEM AT ONE
10 POINT?

11 **A** YES.

12 **Q** AND GOING BACK TO THE CAMERAS FOR JUST A
13 MINUTE, YOU SAID THAT THERE WERE STRANGERS COMING ONTO
14 THE PROPERTY AND THERE'S A GENERAL CONSENSUS THAT
15 SECURITY IS NEEDED. DO YOU KNOW WHO THESE STRANGERS
16 WERE?

17 **A** I KNOW INSTANTS SUCH AS [REDACTED] HAD A FILM
18 CREW FILMING A MOVIE WITH A MATTRESS AND A GIRL IN
19 LINGERIE IN THE BASEMENT. SO THERE WAS ABOUT TEN PEOPLE
20 THERE AND FILM CREW GOING EVERYWHERE. THEN THERE WAS A
21 PHOTO SHOOT WHICH I WAS NOT THERE OF MODELS AND TAKING UP
22 THE COURTYARD. AND THEN ON AND ON THERE WERE STRANGERS
23 FROM AIRBNB COMING IN AND OUT ALL THE TIME.

24 SO WHEN THE PROJECT OR BEFORE THAT STUFF
25 STARTED, IT WAS VERY QUIET. EVERYONE KNEW WHO THEY WERE.
26 WE ARE ALL PART TIMERS EXCEPT FOR MR. ECONN. EVERYONE
27 THERE IS PART TIME. WE ALL HAVE OTHER RESIDENCES IN
28 OTHER COUNTIES. SO WE LIKE OUR PRIVACY WHEN WE SHOWED

1 UP. SO EVERYONE WAS REAL UPSET ACTUALLY TO THE POINT
2 THAT DAVE PILE (PHONETICALLY) HIS DAUGHTER -- HE HAS TWO
3 UNITS. HIS DAUGHTER STARTED UCLA. SHE WAS SUPPOSED TO
4 LIVE THERE, BUT HE FELT IT WAS UNSAFE TO HAVE HER THERE.
5 HE HAD TO RENT AN APARTMENT FOR HER SEPARATE FROM THE
6 UNIT THAT HE OWNS.

7 Q AND MR. PILE YOU SAID HE OWNS TWO UNITS AT

8

9 A YES.

10 Q IS HE STILL AN OWNER OF A UNIT AT

11

12 A YES, HE IS.

13 Q AND DID HE EVER TELL YOU WHY HIS DAUGHTER
14 FELT UNSAFE?

15 A BECAUSE THE ACTIVITIES THAT WERE GOING ON
16 WITH AIRBNB AND MOVIE SHOOTS AND ALL OF THAT. HE FELT
17 VERY UNSAFE.

18 Q WERE THERE ANY BREAK-INS THAT OCCURRED AT

19

20 A MY UNDERSTAND IS YES.

21 Q DO YOU REMEMBER HOW MANY?

22 A I KNOW THE UNIT WAS BROKEN IN DOWNSTAIRS.
23 UNIT OF MINE WAS BROKEN INTO AND THRASHED. I THINK THERE
24 MAY HAVE BEEN A COUPLE OF OTHERS.

25 Q DO YOU KNOW WHOSE UNIT DOWNSTAIRS IT WAS
26 THAT YOU BELIEVE WAS BROKEN INTO?

27 A KELLY DAY.

28 **THE COURT:** D-A-Y?

1 **THE WITNESS:** I THINK THAT IS THE SPELLING.

2 **BY MR. KANANI:**

3 **Q** DO YOU KNOW IF MS. [REDACTED]'S UNIT WAS EVER
4 BROKEN INTO?

5 **A** I DO NOT KNOW. EXCEPT FOR LISTENING WHAT I
6 WAS HEARING. AND I'M NOT SURE IT WAS BROKEN INTO.

7 **Q** DO YOU KNOW WHO DECIDED PLACEMENT OF THE
8 CAMERAS?

9 **A** NO IDEA.

10 **Q** BUT YOU WEREN'T INVOLVED IN THAT DECISION?

11 **A** I JUST SAID NO IDEA.

12 **Q** REGARDING THE CAMERAS AND ACCESS TO THE
13 SURVEILLANCE FOOTAGE, DO YOU KNOW IF ALL OF THE
14 HOMEOWNERS HAD THE ABILITY TO ACCESS THE FOOTAGE OR NOT?

15 **A** I KNOW NOTHING ABOUT THE CAMERAS AND ACCESS
16 UNTIL WHAT I HAVE HEARD HERE TODAY OR THE LAST TWO DAYS.

17 **Q** THE STRANGERS THAT YOU MENTIONED PREVIOUSLY,
18 WERE ANY OF THEM EVER ACCUSED OF A CRIME OR INAPPROPRIATE
19 BEHAVIOR BY ANY OF THE HOMEOWNERS OR BOARD MEMBERS OF

20 [REDACTED]

21 **MR. KENNEDY:** OBJECTION. LACKS FOUNDATION. CALLS
22 FOR SPECULATION.

23 **THE COURT:** SUSTAINED.

24 **BY MR. KANANI:**

25 **Q** DO YOU KNOW IF ANY OF THE STRANGERS WERE
26 EVER ACCUSED BY ANY OF THE HOMEOWNERS OR BOARD MEMBERS OF
27 [REDACTED] FOR INAPPROPRIATE BEHAVIOR?

28 **A** I HAVE NO IDEA.

1 **Q** HAVE YOU EVER VIEWED THE SURVEILLANCE
2 FOOTAGE OF THE CAMERAS AT [REDACTED]

3 **A** NEVER.

4 **Q** HAVE YOU EVER REQUESTED TO VIEW THEM?

5 **A** NEVER.

6 **Q** HAS ANYONE WORKING FOR YOU OR ON YOUR BEHALF
7 EVER VIEWED THE CAMERA FOOTAGE?

8 **A** NEVER.

9 **Q** HAVE THERE BEEN MORE BREAK-INS RECENTLY AT
10 [REDACTED] AND I'LL DEFINE RECENT AS WITHIN THE
11 LAST 12 MONTHS.

12 **A** I DON'T KNOW. I DON'T VISIT THERE. I HAVE
13 NOT BEEN THERE MUCH.

14 **Q** WHEN WAS THE LAST TIME THAT WERE YOU THERE
15 IF YOU CAN REMEMBER?

16 **A** LAST TIME I WAS THERE WAS WHEN [REDACTED] AND
17 HER LITTLE CREW OF PEOPLE ACCOSTED ME.

18 **Q** AND DO YOU REMEMBER THE MONTH OR YEAR IN
19 WHICH THAT OCCURRED?

20 **A** I'M TERRIBLE WITH DATES.

21 **Q** IF YOU CAN'T, THAT IS OKAY.

22 **A** I'M NOT SURE. IT'S IN THE PAPERWORK,
23 THOUGH.

24 **Q** THAT'S FINE.

25 I HAVE A QUICK QUESTION FOR THE COURT,
26 YOUR HONOR.

27 **THE COURT:** YES.

28 **MR. KANANI:** MR. OLSON MENTIONED SOMETHING WHICH I

1 COULD FOLLOW-UP ON BUT I THINK IT'S RELATED TO HIS
2 CASE-IN-CHIEF. SHOULD I WAIT UNTIL HE TAKES THE STAND
3 LATER OR JUST CONTINUE THAT?

4 **THE COURT:** ENTIRELY UP TO YOU. IT WOULD BE WITHIN
5 THE SCOPE OF YOUR EVIDENCE CODE 776 EXAMINATION AND AS
6 PART OF YOUR CROSS.

7 **MR. KANANI:** OKAY.

8 **THE COURT:** UP TO YOU IF YOU WANT TO ASK IT. IF
9 YOU DON'T -- HERE IS THE TACTICAL THING. IF YOU DON'T
10 ASK IT NOW, THERE'S A CHANCE MR. OLSON WON'T BE CALLED
11 DURING HIS CASE-IN-CHIEF AND YOU'VE LOST THE OPPORTUNITY.
12 TAKE THAT FOR WHATEVER IT'S WORTH.

13 **MR. KANANI:** THANK YOU, YOUR HONOR.

14 **THE COURT:** I WOULD RATHER WE NOT DANCE AROUND THE
15 ISSUES BUT RATHER WE GET TO THE ISSUES, PLEASE.

16 **BY MR. KANANI:**

17 **Q** YOU SAID THAT [REDACTED]'S -- AND I'M ASSUMING
18 YOU'RE REFERRING TO MS. [REDACTED] SITTING TO MY RIGHT.

19 **A** I'M SORRY?

20 **Q** I'M ASSUMING WHEN YOU SAY [REDACTED] YOU MEAN
21 THE PETITIONER SITTING TO MY RIGHT?

22 **A** YES.

23 **Q** YOU SAID THAT [REDACTED]'S FRIENDS ACCOSTED YOU
24 THE LAST TIME YOU WERE AT [REDACTED] CAN YOU
25 DESCRIBE THAT INCIDENT?

26 **A** YES. I HAD GOLFED THAT DAY AND I PLANNED TO
27 HAVE DINNER WITH MY FRIEND DOUG ECONN. AND I THOUGHT I
28 WOULD USE MY UNIT FOR A SHOWER. I WAS NOT GOING TO STAY

1 THERE. I REALIZED I DID NOT HAVE MY KEYS. SO ASKED DOUG
2 IF I CAN SHOWER IN YOUR PLACE. AND I WENT TO SHOWER IN
3 HIS PLACE. AND I FORGOT SOMETHING. WENT BACK OUT TO MY
4 CAR. WHEN I DID THAT, I NOTICED THAT MS. [REDACTED] AND
5 THE FELLOW HERE, THE BALLET OR DANCER GUY, HE WAS THERE.
6 AND I THINK IT WAS HIM AT LEAST. AND SOME OTHER LARGE
7 FELLA.

8 WHEN I CAME BACK OUT, THE ONE FELLOW CAME
9 WALKING UP TO ME VERY AGGRESSIVELY. IT TURNED OUT HE WAS
10 SERVING ME PAPERS. HE HANDED ME SOME PAPERS. AND I WENT
11 OKAY. TOOK THE PAPERS. WENT BACK INTO DOUG'S UNIT AND
12 TOOK MY SHOWER. GOT READY. AND WHEN WE WERE LEAVING,
13 THE GUY HAD COME TO THE DOOR AND WAS KNOCKING ON DOUG'S
14 DOOR AND DOUG TOLD HIM TO GO AWAY. BUT WHEN WE CAME OUT,
15 THAT IS WHEN I WAS CONCERNED AND I HAD MY VIDEO ON. IT'S
16 NOT A GREAT VIDEO BUT A VIDEO OF THESE PEOPLE.

17 AND SO WE WERE JUST THINKING WE WERE GOING
18 TO WALK BY. THEY ARE OUT DRINKING WINE ON THE COURTYARD
19 AND TABLE. AND AS I'M WALKING BY, THE GUY GETS UP AND HE
20 STARTS COMING OVER TO ME QUICK. AND HE STARTS THROWING A
21 PAPER AT ME. I GO, NO, WAIT A MINUTE. I DON'T KNOW WHO
22 YOU ARE. YOU SHOW ME YOUR I.D. SHOW ME YOUR I.D. AND
23 MAYBE YOU CAN GIVE ME THE PAPERS. HE HAD ALREADY DONE
24 THIS ONCE. NOW I'M GETTING AGITATED AND WORRIED AND
25 SCARED AND NERVOUS BECAUSE THIS VERY BIG GUY IS STANDING
26 IN THE BACK STARTING TO COME UP.

27 MS. [REDACTED] IS SAYING STUFF TO HIM LIKE GET
28 OVER THERE, GET OVER THERE. AND SO AT THE END OF THE

1 DAY, I'M LIKE I WANT TO GET OUT. AND THERE'S A HALLWAY
2 WHICH IS ENTER IT AND IT'S A HALLWAY TO GO BACK OUTSIDE
3 WHERE THE GARAGE ARE. SO WE GET IN THE HALLWAY JUST WE
4 WERE GOING TO GET AWAY. I HAVE A DRIVER THAT DAY. GO
5 GET IN THE CAR. AND THE GUY IS RUNNING OUT CHASING AFTER
6 US. HE TAKES THE PAPERS. I CLOSED THE DOOR. SLAMS IT
7 ON THE WINDOW. IT STICKS ON THE WINDOW. AND I TELL MY
8 DRIVER LET'S GET OUT OF HERE. WE DRIVE UP THE STREET.
9 THE PAPER HAD WEDGED BETWEEN THE GLASS AND THE RUBBER AT
10 THE BOTTOM AND IT WAS STILL THERE. WE DID NOT DRIVE AWAY
11 FAST. I SAID STOP. I PULLED THE PAPER OUT. AND IT WAS
12 ANOTHER SUBPOENA NOTICE THAT IT WAS NOT FILLED OUT. IT
13 WAS BLANK. SO IT WAS JUST A WAY TO HARASS ME. AND I
14 THINK THEY JUST WANTED TO AGITATE ME. I'M 152 POUNDS
15 DRIPPING WET.

16 **THE COURT:** YOU HAVE ANSWERED THE QUESTION ABOUT
17 WHAT HAPPENED.

18 **THE WITNESS:** I'M TELLING YOU --

19 **THE COURT:** WELL, HOW YOU FELT WAS NOT THE
20 QUESTION.

21 **THE WITNESS:** THE FACT IS --

22 **THE COURT:** SIR, THAT IS BEYOND THE SCOPE OF THE
23 QUESTION. YOUR ANSWER IS FINISHED.

24 **THE WITNESS:** OKAY.

25 **THE COURT:** NEXT QUESTION.

26 **BY MR. KANANI:**

27 **Q** YOU SAID AT SOME POINT ONE OF THESE MEN HAD
28 SLAMMED THE DOCUMENT ON YOUR WINDOW; IS THAT CORRECT?

1 **A** YES.

2 **Q** WAS THE CAR MOVING WHEN THE DOCUMENT WAS
3 SLAMMED ONTO THE WINDOW?

4 **A** WE WERE JUST STARTING TO PULL WAY.

5 **Q** WHEN HE SLAMMED IT ONTO THE WINDOW, DID HE
6 LEAVE THE DOCUMENT ON THE WINDOW AND MOVE IT AT ALL OR
7 DID HE SLAM IT AND THEN PULL BACK?

8 **A** HE SLAMMED IT AND PULLED BACK AND WE DROVE
9 AWAY.

10 **Q** YOU ALSO STATED THAT THE DOCUMENT WAS WEDGED
11 BETWEEN THE WINDOW AND SOMETHING ELSE. I DON'T REMEMBER
12 WHAT YOU SAID.

13 **A** WITHOUT GETTING TOO TECHNICAL, THE WINDOW
14 STUCK THERE SOMEHOW -- THE PAPER STUCK ON THE WINDOW
15 SOMEHOW.

16 **Q** BUT YOU SAID PREVIOUSLY IT WAS WEDGED INTO
17 SOMETHING.

18 **A** THAT WAS PROBABLY SPECULATION.

19 **Q** OKAY. SO WAS IT WEDGED INTO SOMETHING OR
20 NOT?

21 **A** I'M A LITTLE UNCLEAR. THE FACT IS THAT THE
22 PAPER WAS THERE. AND I GOT OUT OF THE CAR AND READ IT
23 AFTERWARDS.

24 **Q** BUT MY QUESTION IS MORE DIRECTED TOWARDS
25 YOUR CREDIBILITY BECAUSE YOU SAID THAT THE DOCUMENT WAS
26 SLAMMED ONTO THE WINDOW AND HAND PULLED BACK. I'M
27 CURIOUS HOW A DOCUMENT COULD BE WEDGED INTO SOMETHING IF
28 THE CONTACT WAS SO MINIMAL AND QUICK.

1 **MR. KENNEDY:** OBJECTION. CALLS FOR SPECULATION.
2 MISSTATES THE WITNESS' TESTIMONY.

3 **THE COURT:** SUSTAINED. IT'S ALSO IMPROPER
4 QUESTIONING OF A WITNESS. HE TESTIFIED WHAT HAPPENED.
5 YOU'RE NOW CHALLENGING. YOU'RE ARGUING WITH HIM IS WHAT
6 YOU'RE DOING. THAT IS IMPROPER QUESTIONING.

7 **BY MR. KANANI:**

8 **Q** SO GOING BACK TO THE COURTYARD PREVIOUSLY,
9 YOU SAID THAT THERE WERE TWO GENTLEMEN AND ONE OF THEM
10 APPROACHED YOU VERY QUICKLY; IS THAT CORRECT?

11 **A** CORRECT.

12 **Q** AND MR. ECONN I BELIEVE PREVIOUSLY TESTIFIED
13 THAT THEY APPEARED TO BE DRUNK. WOULD YOU AGREE WITH HIS
14 ASSESSMENT?

15 **A** I CANNOT ASSESS WHETHER THEY WERE DRUNK OR
16 NOT. THEY WERE DRINKING.

17 **Q** DID THEY APPEAR -- STRIKE THAT. REPHRASE.
18 WERE THEY HAVING TROUBLE BALANCING
19 THEMSELVES?

20 **A** I'M SORRY?

21 **MR. KENNEDY:** CALLS FOR SPECULATION.

22 **THE COURT:** OVERRULED.

23 **BY MR. KANANI:**

24 **Q** WERE THEY HAVING TROUBLE BALANCING
25 THEMSELVES?

26 **A** BALANCING THEMSELVES?

27 **Q** YES.

28 **A** THEY BOUNCED A LOT.

1 **Q** OKAY. DID THEY SLUR THEIR SPEECH AT ALL?

2 **A** I'M NOT SURE.

3 **Q** DID THEY SMELL OF ALCOHOL?

4 **A** I DON'T KNOW.

5 **Q** DID YOU SEE THEM WITH A DRINK?

6 **A** YES.

7 **Q** WHAT DRINK DID YOU SEE THEM WITH?

8 **A** I RECALL THAT I SAW A BOTTLE OF WINE.

9 **Q** WAS THE BOTTLE OF WINE EMPTY?

10 **A** I DON'T KNOW.

11 **Q** OKAY. MR. OLSON, I'M SORRY. AT THIS TIME I
12 WOULD LIKE TO PRESENT THE WITNESS WITH THE PETITIONER'S
13 EXHIBIT 27.

14 **THE COURT:** ONE MOMENT OFF THE RECORD.

15

16 (PAUSE IN THE PROCEEDINGS.)

17

18 **THE COURT:** BACK ON THE RECORD. WHAT WAS THE
19 EXHIBIT NUMBER?

20 **MR. KANANI:** TWENTY-SEVEN. WE'LL START AT 27-2.

21 **THE COURT:** THE WITNESS HAS EXHIBIT 27.

22 **BY MR. KANANI:**

23 **Q** ARE YOU ON THE SECOND PAGE OF THE EXHIBIT,
24 MR. OLSON? DO YOU SEE THE TWO INDIVIDUALS LOCATED IN THE
25 MIDDLE OF THIS PHOTOGRAPH?

26 **A** DID HE SAY NO. 2?

27 **THE COURT:** 27-2.

28 **MR. KANANI:** YES.

1 **THE WITNESS:** AND HE SAID IF I SAW TWO INDIVIDUALS.

2 **THE COURT:** YES. IT HELPS, MR. KANANI, IF YOU LOOK
3 AT MR. OLSON WHEN YOU SPEAK TO HIM WITH YOUR QUESTION.

4 **MR. KANANI:** ABSOLUTELY.

5 **THE COURT:** TRY THAT.

6 **BY MR. KANANI:**

7 **Q** DO YOU SEE TWO INDIVIDUALS LOCATED IN THE
8 CENTER OF THE PHOTOGRAPH?

9 **A** JUST TO BE CLEAR, THERE'S -- LOOKS LIKE
10 POSSIBLY FOUR PEOPLE. I GUESS YOU'RE TALKING ABOUT THE
11 TWO --

12 **Q** THE TWO PEOPLE AT BOTTOM OF THE STAIRS.

13 **A** YES.

14 **Q** STARTING WITH THE INDIVIDUAL ON THE LEFT
15 STANDING AT THE BOTTOM OF THE STAIRS, DO YOU KNOW WHO
16 THAT INDIVIDUAL IS?

17 **A** NO. I DO NOT KNOW WHO IT IS.

18 **Q** DO YOU KNOW WHY HE WAS THERE AT [REDACTED]
19 [REDACTED] THAT DAY?

20 **A** I KNOW THERE WAS A MEETING WITH THE PEOPLE
21 THAT WERE OWNING OR PURCHASING THE LOT NEXT DOOR. WE'VE
22 HAD A LOT OF NEGOTIATIONS WITH THEM GOING ON FOR THE LAST
23 COUPLE OF YEARS.

24 **Q** WHO'S HAD NEGOTIATIONS WITH THEM WHEN YOU
25 SAY, "WE"?

26 **A** IT'S BEEN A COMBINATION OF DOUG ECONN, CURT
27 OLSON, MYSELF, SCOTT BURNHAM. DIFFERENT VARIOUS
28 ATTORNEYS FOR THE ASSOCIATION.

1 **Q** WAS MS. ██████████ EVER INCLUDED IN THESE
2 DISCUSSIONS?

3 **A** SHE WAS ON A PHONE CALL RECENTLY WHERE WE --
4 TO DISCUSS THE WHOLE TRANSACTION.

5 **Q** DID SHE EVER MEET THE OTHER SIDE, THE
6 POTENTIAL BUYERS OR SELLERS IN THIS TRANSACTION?

7 **MR. KENNEDY:** CALLS FOR SPECULATION.

8 **THE WITNESS:** I THINK YOU SHOULD ASK HER.

9 **THE COURT:** THE ANSWER STANDS. THE OBJECTION IS
10 OVERRULED.

11 **BY MR. KANANI:**

12 **Q** IF YOU CAN TURN TO THE NEXT PAGE, MR. OLSON.

13 **A** UH-HUH.

14 **Q** DO YOU SEE THE INDIVIDUAL ON THE RIGHT IN
15 THIS PHOTOGRAPH?

16 **A** YES.

17 **Q** DO YOU KNOW WHO THIS INDIVIDUAL IS?

18 **A** I DO NOT KNOW. ONLY THING I KNOW IS WHAT I
19 HEARD IN THIS COURTROOM.

20 **Q** OTHER THAN WHAT YOU HEARD IN THIS COURTROOM,
21 DO YOU KNOW ANYTHING ABOUT THIS INDIVIDUAL?

22 **A** NO, I DO NOT.

23 **Q** IF YOU TURN TO THE 27-5. THAT IS TWO PAGES
24 OVER. YOU SHOULD SEE TWO INDIVIDUALS IN THIS PHOTOGRAPH
25 COMING DOWN THE STAIRCASE.

26 **A** YES.

27 **Q** AND DO YOU SEE THE INDIVIDUAL IN THE DARKER
28 COLOR SHIRT HIGHER UP IN THE STAIRCASE?

1 **A** YES.

2 **Q** DO YOU KNOW WHO HE IS?

3 **A** I DO NOT.

4 **Q** DO YOU KNOW WHY HE WAS THERE?

5 **A** I UNDERSTAND THAT HE WAS IN THE SAME
6 MEETING.

7 **Q** DID HE COME OUT OF YOUR UNIT?

8 **A** I HAVE NO IDEA.

9 **Q** DO YOU KNOW IF HE WAS EVER IN YOUR UNIT?

10 **A** I HAVE NO IDEA.

11 **Q** I'M SORRY. REPHRASE.

12 THE UNIT THAT THEY ARE COMING OUT OF, DO YOU
13 KNOW WHOSE UNIT THAT IS?

14 **A** THAT IS MINE.

15 **Q** DO YOU STILL CURRENTLY OWN THAT UNIT?

16 **A** YES.

17 **Q** IF YOU TURN TO THE NEXT PAGE, THERE'S A
18 WOMAN IN THE MIDDLE OF THE PHOTOGRAPH WEARING SUNGLASSES.
19 DO YOU KNOW WHO SHE IS?

20 **A** NO.

21 **Q** OTHER THAN WHAT YOU HEARD IN THIS COURTROOM,
22 DO YOU KNOW WHY SHE WAS THERE?

23 **A** NO.

24 **Q** REGARDING THIS MEETING THAT WAS TAKING
25 PLACE, WERE YOU INFORMED THAT THE MEETING WOULD BE
26 OCCURRING PRIOR TO IT HAPPENING?

27 **A** I CAN'T RECALL.

28 **Q** YOU CAN SET THE BINDER ASIDE.

1 DO YOU REMEMBER IF ANYONE EVER ASKED YOU TO
2 LET THEM ONTO THE PROPERTY OR ASK TO SET UP THE MEETING
3 WITH YOU?

4 A THERE WOULD BE NO REASON TO DO THE MEETING
5 THROUGH ME. I'M NOT -- I WAS NOT ON THE BOARD.

6 Q SO THE MEETING -- THE MEETING REQUEST AND
7 APPROVAL WOULD HAVE GONE THROUGH THE BOARD AND YOU
8 WEREN'T A MEMBER OF THE BOARD?

9 A IT MIGHT HAVE GONE THROUGH PROPERTY
10 MANAGEMENT. I'M NOT SURE.

11 Q WERE YOU AWARE THAT THESE INDIVIDUALS WOULD
12 BE MEETING WITH MR. FEDER?

13 A I UNDERSTAND THAT MR. FEDER WAS LETTING THEM
14 INTO THE PROPERTY AND SHOWING THE PROPERTY TO THEM.

15 Q HAVE YOU SPOKEN WITH ANY OF THOSE
16 INDIVIDUALS SINCE?

17 A I'M SORRY?

18 Q HAVE YOU SPOKEN WITH ANY OF THOSE
19 INDIVIDUALS SINCE THE MEETING TOOK PLACE?

20 A NO, I HAVE NOT. I'M SORRY. DAVID FEDER AND
21 I HAVE. I'M SORRY.

22 Q WHEN I REFER TO THE INDIVIDUALS, I MEAN THE
23 FOUR INDIVIDUALS BESIDES MR. FEDER.

24 A NO. TO CLARIFY, NO, I HAVE NOT.

25 Q THANK YOU. MR. OLSON, A FEW GENERAL
26 QUESTIONS. AT ANY POINT IN THE PAST FEW YEARS, LET'S SAY
27 NO MORE THAN FIVE YEARS AT MOST, DID YOU BREAK INTO
28 MS. ██████████'S STORAGE UNIT IN THE BASEMENT OF ██████████

1 [REDACTED]?

2 A NEVER.

3 Q DID YOU DIRECT ANYONE ELSE TO DO SO?

4 A NO.

5 Q DID ANYONE ASK YOU TO PARTICIPATE IN DOING
6 SO?

7 A NO.

8 Q DID YOU EVER REQUEST ATTORNEYS' FEES FROM
9 MS. [REDACTED] AFTER 2015 FOR A LEGAL DISPUTE THAT YOU HAD
10 WITH HER?

11 MR. KENNEDY: OBJECTION. RELEVANCE.

12 THE COURT: SUSTAINED.

13 BY MR. KANANI:

14 Q DID YOU EVER SEXUALLY ASSAULT MS. [REDACTED]
15 AT ANY TIME?

16 A NEVER.

17 Q DID YOU EVER TRY TO ENGAGE IN A SEXUAL ACT
18 WITH HER WITHOUT HER CONSENT AT ANY TIME?

19 A NEVER.

20 Q DID YOU EVER ENTER HER UNIT WITHOUT HER
21 CONSENT?

22 A NEVER.

23 Q DID YOU EVER ENTER HER UNIT IN THE LAST FIVE
24 YEARS AT ALL WITH OR WITHOUT --

25 A NO.

26 Q HAS SHE EVER ENTERED YOUR UNIT WITHOUT YOUR
27 CONSENT?

28 A MY UNDERSTANDING IS YES.

1 **Q** DO YOU REMEMBER WHEN THAT HAPPENED?

2 **A** I'VE HEARD IT OVER -- NOT IN THE LAST FIVE
3 YEARS. DO YOU WANT THE FIVE YEAR TIMEFRAME OR WHAT DO
4 YOU WANT?

5 **Q** JUST THE LAST FIVE YEARS.

6 **A** I KNOW SHE ENTERED IT FROM OUR RENTERS
7 WITHOUT BEING ALLOWED TO WALK IN.

8 **Q** DO YOU KNOW WHEN SHE DID THAT?

9 **A** YEAH. IT WAS -- I DON'T KNOW.
10 APPROXIMATELY A YEAR GO. WHENEVER THEY MOVED IN.

11 **Q** ARE YOU REFERRING TO THE ARGUES?

12 **A** YES.

13 **Q** DID SHE EVER ENTER YOUR UNIT IN THE LAST
14 FIVE YEARS WITH YOUR CONSENT?

15 **A** WITH MY CONSENT?

16 **Q** YES.

17 **A** NO.

18 **Q** I'M GOING TO -- HAVE YOU EVER MET AN
19 INDIVIDUAL NAMED LENNY DYKSTRA?

20 **A** THE BASEBALL PLAYER?

21 **Q** I DON'T KNOW IF HE'S A BASEBALL PLAYER. I
22 BELIEVE HE MIGHT BE. JUST BY THAT NAME.

23 **THE COURT:** HE MAY BE DATING SOME PEOPLE IN THE
24 COURTROOM.

25 **MR. KENNEDY:** PHILLIES FAN.

26 **THE COURT:** NO. CHICAGO CUBS FAN.

27 ARE YOU TALKING ABOUT LENNY DYKSTRA THE
28 FORMER BASEBALL PLAYER?

1 **MR. KANANI:** I BELIEVE SO.

2 **THE COURT:** OR SOMEONE ELSE WITH THE SAME NAME.

3 **MR. KANANI:** OR SOMEONE ELSE WITH THE SAME NAME.

4 **THE COURT:** DO YOU KNOW SOMEONE --

5 **THE WITNESS:** IN MEXICO I MET LENNY DYKSTRA.

6 **THE COURT:** THE BASEBALL PLAYER?

7 **THE WITNESS:** YEAH. HE WAS A GOLFER.

8 **BY MR. KANANI:**

9 **Q** ARE YOU FRIENDS WITH MR. DYKSTRA CURRENTLY?

10 **A** NO.

11 **Q** DO YOU MAINTAIN ANY SORT OF RELATIONSHIP
12 WITH HIM?

13 **A** NO.

14 **Q** DID YOU EVER MAINTAIN ANY SORT OF
15 RELATIONSHIP WITH MR. DYKSTRA?

16 **A** NO.

17 **Q** HAVE YOU EVER MET OR BEEN MADE AWARE OF AN
18 INDIVIDUAL WHO USED TO WORK AT THE CAFÉ? THIS IS THE
19 SAME CAFÉ I WAS --

20 **A** I DID NOT HEAR THE FIRST PART.

21 **THE COURT:** START AGAIN.

22 **BY MR. KANANI:**

23 **Q** ARE YOU AWARE OF AN INDIVIDUAL WHO USED TO
24 WORK AT THE CAFÉ NAMED MICHAEL ABNEY?

25 **MR. KENNEDY:** OBJECTION.

26 **THE WITNESS:** NO.

27 **MR. KENNEDY:** ASSUMES FACTS NOT IN EVIDENCE.

28 **THE COURT:** OVERRULED.

1 **BY MR. KANANI:**

2 **Q** ARE YOU AWARE OF AN INDIVIDUAL AT THE CAFÉ
3 WHO WAS A CHEF WITH THE LAST NAME MARTINEZ?

4 **A** NO.

5 **Q** ARE YOU AWARE OF AN INDIVIDUAL AT THE CAFÉ
6 WHO WAS A BUSBOY WITH THE FIRST NAME RONNY?

7 **A** COULD I SIMPLIFY? I DON'T KNOW ANY OF THE
8 NAMES.

9 **THE COURT:** HE'S ALLOWED TO ASK YOU QUESTIONS TO
10 FIND OUT IF YOU KNOW --

11 **THE WITNESS:** NO.

12 **THE COURT:** -- THESE INDIVIDUALS.

13 **THE WITNESS:** OKAY.

14 **THE COURT:** PLEASE BE PATIENT.

15 **THE WITNESS:** OKAY, SIR.

16 **BY MR. KANANI:**

17 **Q** IS THE ANSWER NO?

18 **A** NO.

19 **Q** HAVE YOU EVER MET AN INDIVIDUAL NAMED BILL
20 HALFORD?

21 **A** YES.

22 **Q** DID MR. HALFORD EVER TELL YOU THAT
23 MS. ████████ -- REPHRASE.

24 DID MR. HALFORD EVER REFER TO MS. ████████
25 AS A CON ARTIST OR PROSTITUTE?

26 **MR. KENNEDY:** OBJECTION. CALLS FOR HEARSAY.

27 **THE COURT:** SUSTAINED.

28 ///

1 **BY MR. KANANI:**

2 **Q** AT ANY POINT, DID YOU ASK THAT SECURITY BE
3 INSTITUTED AT [REDACTED] IN SUCH A WAY THAT
4 IDENTIFICATION WOULD BE REQUIRED FROM INDIVIDUALS WHO
5 WOULD COME ONTO THE PROPERTY?

6 **MR. KENNEDY:** OBJECTION. RELEVANCE.

7 **THE COURT:** OVERRULED.

8 **THE WITNESS:** SO I CAN ANSWER?

9 **THE COURT:** GO AHEAD AND ANSWER.

10 **THE WITNESS:** I KNOW IT WAS DISCUSSED.

11 **BY MR. KANANI:**

12 **Q** DID YOU EVER MAKE THAT REQUEST?

13 **A** ME PERSONALLY?

14 **Q** YES.

15 **A** I THINK I'M IN SUPPORT OF IT. I DON'T THINK
16 I WAS THE ONE WHO HAD THE IDEA.

17 **Q** DO YOU REMEMBER WHO HAD THE IDEA?

18 **A** NO, I DO NOT.

19 **Q** DO YOU REMEMBER IF THAT POLICY WAS EVER
20 INSTITUTED?

21 **A** I DON'T THINK IT WAS.

22 **Q** DO YOU REMEMBER WHEN THE SUGGESTION FOR THE
23 POLICY WAS MADE?

24 **A** NO, I DO NOT.

25 **MR. KENNEDY:** YOUR HONOR, JUST A POINT, WE CAN
26 OVERHEAR THE CONVERSATION GOING ON.

27 **THE COURT:** I CAN TOO. SO, AGAIN, I TALK ABOUT
28 DECORUM IN THE COURTROOM FOR A PURPOSE. DON'T TALK LOUD

1 ENOUGH FOR ME TO HEAR YOU. IT'S YOUR PRIVATE
2 CONVERSATION. YOU SHOULD HAVE YOUR EXAMINATION WORKED
3 OUT SO THAT IT DOES NOT UNDULY CONSUME TIME OR INTERRUPT
4 THE PROCEEDINGS LIKE THIS.

5 **MR. KANANI:** WE ONLY HAVE A FEW MORE QUESTIONS,
6 YOUR HONOR.

7 **THE COURT:** I UNDERSTAND. YOU'RE ALLOWED TO TALK
8 WITH YOUR CLIENT, BUT YOU'RE THE ATTORNEY ASKING THE
9 QUESTIONS. AND I'M IN CONTROL OF THE PROCESS AS THE
10 JUDGE, AS THE TRIER OF FACT. AND TALKING LOUD ENOUGH FOR
11 EVERYBODY IN THE COURTROOM TO HEAR IS INAPPROPRIATE IN
12 THE COURTROOM.

13 CONDUCT YOURSELVES ACCORDINGLY, PLEASE.
14 THIS IS A PLACE OF DIGNITY AND RESPECT. YOU STRONGLY
15 DISAGREE WITH MR. OLSON'S POSITION IN THIS CASE. I GET
16 THAT. I UNDERSTAND THAT. BY YOUR BEHAVIOR, THOUGH, IT
17 DOES NOT HELP YOU WHEN YOU DO THAT. IT MAKES YOUR CASE
18 WORSE WHEN YOU ACT IN A WAY THAT IS OUTSIDE THE SCOPE OF
19 THE RULES I SET AT THE BEGINNING WHICH IS WHY THEY ARE
20 SET AT THE BEGINNING SO THAT THERE'S NO SURPRISES ABOUT
21 THIS. SO WHEN A VIOLATION HAPPENS, I CALL IT OUT.

22 SECOND TIME THIS MORNING I'VE HAD TO STOP TO
23 DO THIS. I DON'T WANT TO HAVE TO STOP AGAIN. CONDUCT
24 YOURSELVES ACCORDINGLY. NEXT QUESTION.

25 **BY MR. KANANI:**

26 **Q** THERE IS A DVR LOCATED AT [REDACTED]
27 MR. OLSON.

28 THERE IS A DVR LOCATED AT [REDACTED]

1 MR. OLSON. DO YOU KNOW WHERE THAT DVR IS LOCATED?

2 A THE ONLY INFORMATION I HAVE ON THAT IS WHAT
3 I HEARD THE OTHER DAY. SOMEPLACE IN THE BASEMENT.

4 Q YOU MENTIONED EARLIER A FILM CREW ON [REDACTED]
5 [REDACTED]

6 A YES.

7 Q DID YOU APPROACH THIS FILM CREW WHENEVER
8 THEY WERE PRESENT?

9 A YES, I DID.

10 Q DO YOU REMEMBER YOUR INTERACTION WITH THEM?

11 A I DO. AND [REDACTED] WAS STANDING RIGHT THERE.
12 MOST OF MY INTERACTION WAS WITH [REDACTED]. I WAS VERY UPSET
13 WITH HER FOR RENTING OUT OUR FACILITY FOR SOME KIND OF
14 PORNOGRAPHIC SHOW GOING ON DOWN IN THE BASEMENT. GIRL IN
15 A LINGERIE ON A MATTRESS AND IT'S TRESPASSING. IT'S MY
16 BASEMENT. NOT HERS.

17 Q DID YOU EVER APPROVE THE PRESENCE THE FILM
18 CREW AT [REDACTED]

19 A NEVER.

20 MR. KANANI: NOTHING FURTHER AT THAT TIME,
21 YOUR HONOR.

22 THE COURT: CROSS-EXAMINATION UNDER EVIDENCE CODE
23 776.

24 MR. KENNEDY: NO QUESTIONS, YOUR HONOR.

25 THE COURT: ALL RIGHT. AND YOU RESERVE YOUR RIGHT
26 TO CALL HIM DURING YOUR CASE-IN-CHIEF.

27 MR. KENNEDY: WE DO.

28 THE COURT: YOU MAY STEP DOWN, MR. OLSON. THANK

1 YOU.

2 MR. KANANI, YOUR NEXT WITNESS.

3 **MR. KANANI:** PETITIONER. SHE ASKS FOR A TEN-MINUTE
4 BREAK TO RUN TO THE BATHROOM.

5 **THE COURT:** WHY DON'T WE TAKE OUR MORNING
6 TEN-MINUTE BREAK. WHEN WE COME BACK, WE'LL GO STRAIGHT
7 THROUGH UNTIL 12:00. IF WE NEED A FIVE STRETCH, YOU LET
8 ME KNOW.

9

10 (A BRIEF RECESS WAS TAKEN.)

11

12

13 ///

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1 **THE COURT:** BACK ON THE RECORD.

2 ██████████ SIDE, NEXT WITNESS.

3 **MR. KANANI:** PETITIONER CALLS HERSELF.

4 **THE COURT:** THANK YOU. MS. ██████████, IF YOU WILL,
5 COME UP TO THE WITNESS STAND.

6 PLEASE REMAIN STANDING AND RAISE YOUR RIGHT
7 HAND TO BE SWORN.

8

9 ██████████ ██████████,

10 CALLED AS A WITNESS ON HER OWN BEHALF,

11 WAS SWORN AND TESTIFIED AS FOLLOWS:

12

13 **THE COURT CLERK:** YOU DO SOLEMNLY STATE THAT THE
14 TESTIMONY YOU MAY GIVE IN THE CAUSE NOW PENDING BEFORE
15 THIS COURT SHALL BE THE TRUTH, THE WHOLE TRUTH, AND
16 NOTHING BUT THE TRUTH, SO HELP YOU GOD?

17 **THE WITNESS:** YES.

18 **THE COURT CLERK:** PLEASE BE SEATED.

19 STATE AND SPELL YOUR FIRST AND LAST NAME FOR
20 THE RECORD.

21 **THE WITNESS:** ██████████, ██████████. ██████████,

22 ██████████.

23 **THE COURT:** THANK YOU. OFF THE RECORD.

24

25 (PAUSE IN THE PROCEEDINGS.)

26

27 **THE COURT:** QUESTIONS ON DIRECT.

28 ///
29

DIRECT EXAMINATION

BY MR. KANANI:

Q GOOD MORNING, MS. [REDACTED]. I WILL DISPENSE WITH THE BACKGROUND. HAVE YOU EVER HAD ACCESS TO THE -- I'M SORRY. HAVE YOU EVER VIEWED, OTHER THAN THE FOOTAGE THAT'S BEEN PROVIDED VIA SUBPOENA, ANY OTHER SURVEILLANCE FOOTAGE AT [REDACTED]

A NO.

Q HAVE YOU EVER ATTEMPTED TO VIEW OTHER SURVEILLANCE FOOTAGE AT [REDACTED]

A YES.

Q WERE YOU ABLE TO?

A NO.

Q DO YOU BELIEVE THAT MR. OLSON HAS SEEN ANY OF THE FOOTAGE FROM [REDACTED]

A YES.

Q WHY DO YOU BELIEVE THAT?

A BECAUSE HIS ATTORNEY TOLD ME HE HAD.

Q WHEN DID HIS ATTORNEY TELL YOU THAT APPROXIMATELY?

A AROUND MAY, 2017.

Q DO YOU REMEMBER THE CONTEXT IN WHICH HIS ATTORNEY TOLD YOU THAT HE HAD SEEN SOME OF THE SURVEILLANCE FOOTAGE FROM [REDACTED]

A YES.

Q WHAT WAS THE CONTEXT?

A HE WAS SERVING ME WITH A CROSS-COMPLAINT. AND I WENT DOWN TO GET SOME DOCUMENTS. THEY BUZZED ME,

1 AND I WENT DOWN. AND THEN I LOOKED -- THEY GAVE ME SOME
2 SORT OF PACKAGE, AND I BROUGHT IT BACK AND I WASN'T SURE
3 WHAT IT WAS. AND SO THEN HE CALLED ME, BECAUSE I WAS PRO
4 PER, AND HE TOLD ME I KNOW YOU GOT SERVED BECAUSE I
5 WATCHED IT ON THE VIDEO CAMERA. ERIC KENNEDY SAID THAT
6 TO ME.

7 **MR. KENNEDY:** OBJECTION. RELEVANCE.

8 **THE COURT:** OVERRULED.

9 **BY MR. KANANI:**

10 **Q** MS. [REDACTED], AS YOU ARE -- I'M SORRY. HOW
11 LONG HAVE YOU BEEN LIVING AT [REDACTED]

12 **A** SINCE 2001.

13 **Q** AND JUST FOCUSING ON EVENTS THAT OCCURRED
14 FROM JANUARY 2016 ON, HAVE YOU EVER BEEN PHOTOGRAPHED BY
15 SOMEONE THAT YOU DON'T KNOW?

16 **A** YES.

17 **Q** ON HOW MANY OCCASIONS MORE OR LESS?

18 **A** HOW MANY OCCASIONS? IT'S HARD TO SAY
19 BECAUSE --

20 **Q** IS IT MORE THAN TEN DIFFERENT TIMES?

21 **A** I THINK SO, YES.

22 **Q** DID YOU SEE THE MEN WHO WERE TAKING THE
23 PHOTOGRAPHS -- I'M SORRY. DID YOU SEE THE INDIVIDUALS
24 WHO WERE TAKING PHOTOGRAPHS OF YOU?

25 **A** YES.

26 **Q** CAN YOU DESCRIBE HOW THEY WERE DRESSED?

27 **A** SOMETIMES THEY WERE DRESSED IN BLACK.
28 SOMETIMES THEY JUST HAD LIKE MAYBE A POLO TYPE OF SHIRT

1 AND JEANS. CASUAL CLOTHES.

2 Q DID THEY EVER SPEAK TO YOU WHEN THEY TOOK
3 THESE PHOTOGRAPHS?

4 A NOT AT FIRST. BUT THEN I STARTED GETTING
5 UPSET ABOUT IT, SO I STARTED GOING UP TO THEM, ASKING
6 THEM WHY THEY WERE DOING THIS.

7 Q DID THEY EVER PROVIDE AN ANSWER?

8 MR. KENNEDY: OBJECTION. CALLS FOR HEARSAY.

9 THE COURT: SUSTAINED.

10 BY MR. KANANI:

11 Q DO YOU KNOW WHY THEY WERE TAKING PHOTOGRAPHS
12 OF YOU?

13 MR. KENNEDY: OBJECTION. CALLS FOR SPECULATION.

14 THE COURT: SUSTAINED.

15 BY MR. KANANI:

16 Q IN ADDITION TO TAKING PHOTOGRAPHS, DO YOU
17 BELIEVE THAT ANY OF THESE MEN EVER FOLLOWED YOU OR
18 SURVEILLED YOU?

19 A YES.

20 Q WHY DO YOU BELIEVE THAT?

21 A BECAUSE I COULD SEE THEM BEHIND ME AND
22 BECAUSE PEOPLE ALSO WITNESSED THEM AND TOLD ME THAT THEY
23 WERE SEEING THEM.

24 Q DID YOU SEE THEM WHILE YOU WERE AT YOUR HOME
25 AT [REDACTED]

26 A YES.

27 Q DID YOU SEE THEM WHILE YOU WERE AT THE CAFÉ
28 ACROSS THE STREET?

1 **A** YES.

2 **Q** WERE YOU A REGULAR PATRON OF THE CAFÉ AT ONE
3 POINT, MS. [REDACTED]?

4 **A** YES.

5 **Q** DID YOU EVER MEET AN INDIVIDUAL NAMED AMADO
6 MORENO?

7 **A** YES.

8 **Q** WHAT DOES MR. MORENO DO AT THE CAFÉ?

9 **A** HE'S A WAITER.

10 **Q** DO YOU HAVE ANY OTHER RELATIONSHIP WITH
11 MR. MORENO BESIDES WAITER/PATRON AT THE CAFÉ?

12 **A** YES.

13 **Q** CAN YOU DESCRIBE THAT RELATIONSHIP BRIEFLY
14 FOR THE COURT?

15 **A** MR. MORENO IS ALSO A PASTOR, FORMER PASTOR.
16 WELL, HE'S STILL A PASTOR. AND I DO -- I'M -- I DO
17 RELIGIOUS DANCING AND ALONG WITH BEING A BALLERINA. SO
18 WE OFTEN DISCUSS THE OLD AND NEW TESTAMENT BECAUSE A LOT
19 THE DANCES THAT I DO WERE BASED ON OLD AND NEW TESTAMENT
20 DOCTRINE.

21 **Q** IS IT FAIR TO SAY THAT MR. MORENO BECAME A
22 GOOD FRIEND AS HE WORKED WITH YOU OVER WHATEVER PERIOD OF
23 TIME THIS WAS?

24 **A** YES.

25 **Q** DID MR. MORENO EVER TELL YOU THAT THERE WERE
26 INDIVIDUALS WHO WERE LOOKING FOR YOU AT THE CAFÉ?

27 **MR. KENNEDY:** OBJECTION. CALLS FOR HEARSAY.

28 **THE COURT:** SUSTAINED.

1 **MR. KANANI:** AT THIS TIME, YOUR HONOR, I WOULD LIKE
2 TO PRESENT TO THE WITNESS PETITIONER'S EXHIBIT 12.

3 **THE COURT:** THE WITNESS HAS EXHIBIT 12.

4 **BY MR. KANANI:**

5 **Q** DID YOU WRITE THIS NOTE, MS. [REDACTED] ?

6 **A** NO.

7 **Q** DO YOU KNOW WHO DID?

8 **A** YES.

9 **Q** WHO DO YOU BELIEVE WROTE THIS NOTE?

10 **A** THE TOP ONE?

11 **Q** YES. I'M SORRY. I'LL FOCUS FIRST -- I
12 CAN'T REFER TO THE DOCUMENT AT THIS TIME. IT'S NOT
13 ADMITTED INTO EVIDENCE. BUT --

14 **A** THE TOP PART. YES, I SAW AMADO MORENO WRITE
15 IT.

16 **Q** AND DO YOU REMEMBER WHEN HE WROTE IT?

17 **A** WHEN I VISITED THE CAFÉ.

18 **Q** DO YOU REMEMBER THE MONTH OR YEAR?

19 **A** I THINK IT WAS IN AROUND LATE SEPTEMBER OR
20 OCTOBER OF 2017.

21 **MR. KANANI:** AT THIS TIME, YOUR HONOR, I REQUEST
22 THAT EXHIBIT 12 BE ADMITTED INTO EVIDENCE.

23 **THE COURT:** THE WHOLE DOCUMENT?

24 **MR. KANANI:** YES.

25 **THE COURT:** ANY OBJECTION?

26 **MR. KENNEDY:** YES, YOUR HONOR. LACKS FOUNDATION.
27 NOT AUTHENTIC. IT'S HEARSAY.

28 **THE COURT:** LET ME SEE IT. WELL, I'M NOT SURE

1 HOW -- THERE'S BEEN NO AUTHENTICATION OR FOUNDATION FOR
2 THE SO-CALLED LOWER HALF OF THIS PAGE OR NOTE. I'LL
3 SUSTAIN THE OBJECTION.

4 **MR. KANANI:** AS TO THE ENTIRE DOCUMENT?

5 **THE COURT:** YES. LAY A PROPER FOUNDATION FIRST.

6 **BY MR. KANANI:**

7 **Q** REGARDING THE LOWER HALF OF THE NOTE,
8 MS. ██████████, DO YOU KNOW WHO WROTE THAT NOTE?

9 **A** YES.

10 **Q** WHO WAS IT?

11 **A** AMADO MORENO.

12 **Q** DID HE GIVE YOU THE NOTE SHORTLY AFTER
13 WRITING IT?

14 **A** YEAH, I WATCHED HIM WRITE IT.

15 **Q** DID HE WRITE IT AT THE SAME TIME AS THE
16 FIRST NOTE?

17 **A** NO.

18 **Q** WHEN DID HE WRITE THE BOTTOM PORTION OF THIS
19 EXHIBIT?

20 **A** I BELIEVE THAT NOTE CAME AFTER THE FIRST
21 ONE. SO MAYBE LIKE A MONTH LATER.

22 **MR. KANANI:** OKAY. AT THIS TIME, PETITIONER MOVES
23 TO ADMIT EXHIBIT 12 INTO EVIDENCE?

24 **THE COURT:** ANY OBJECTIONS?

25 **MR. KENNEDY:** SAME OBJECTIONS, YOUR HONOR.

26 **THE COURT:** WHAT ARE THOSE OBJECTIONS?

27 **MR. KENNEDY:** LACKS FOUNDATION. FAILURE TO
28 PROPERLY AUTHENTICATE. NO PERSONAL KNOWLEDGE AND

1 HEARSAY.

2 **THE COURT:** OVERRULED. THERE WAS TESTIMONY THAT
3 THE WITNESS ON THE STAND OBSERVED THE NOTE BEING CREATED
4 AND IT WAS HANDED TO HER. SO THAT ESTABLISHES A
5 SUFFICIENT FOUNDATION. IT IS HEARSAY, YES, BUT HEARSAY
6 IS ADMISSIBLE IN THIS CONTEXT IN A CIVIL HARASSMENT CASE
7 FOR THE LIMITED PURPOSE, AND THE PROBATIVE WEIGHT OR
8 VALUE OF THIS EVIDENCE I WILL DETERMINE AFTER I RECEIVE
9 ALL OF THE EVIDENCE AND ARGUMENT FROM BOTH SIDES.

10 ADMIT NO. 12.

11

12 (EXHIBIT 12 WAS RECEIVED INTO EVIDENCE.)

13

14 **BY MR. KANANI:**

15 **Q** THE TOP NOTE SAYS -- REFERENCES A MAN IN
16 BLACK. DO YOU KNOW WHO MR. MORENO WAS REFERRING TO?

17 **MR. KENNEDY:** CALLS FOR SPECULATION.

18 **THE COURT:** SUSTAINED.

19 **BY MR. KANANI:**

20 **Q** THE BOTTOM PORTION OF THE EXHIBIT, THE
21 SECOND NOTE, SAYS, "IT'S NOT SAFE HERE ANYMORE." DO YOU
22 KNOW WHERE "HERE" IS REFERRING TO?

23 **MR. KENNEDY:** CALLS FOR SPECULATION.

24 **THE COURT:** SUSTAINED.

25 **BY MR. KANANI:**

26 **Q** YOU CAN SET THE BINDER ASIDE.

27 AT ANY POINT DID MR. MORENO WARN YOU THAT
28 THERE WERE PEOPLE AT THE CAFÉ LOOKING FOR YOU?

1 **A** YES.

2 **MR. KENNEDY:** CALLS FOR HEARSAY.

3 **THE COURT:** MAY I HEAR ARGUMENT AS TO WHY THIS IS
4 ADMISSIBLE?

5 **MR. KANANI:** I BELIEVE IT'S ADMISSIBLE UNDER THE
6 SAME STATUTE THAT ALLOWS --

7 **THE COURT:** IT'S NOT STATUTE. IT'S A DECIDED CASE.

8 **MR. KANANI:** THE CASE LAW WHICH ALLOWS HEARSAY FOR
9 A LIMITED PURPOSE IN CIVIL HARASSMENT RESTRAINING ORDERS.
10 THE COURT CAN STILL DETERMINE HOW MUCH WEIGHT TO GIVE IT
11 OR NOT GIVE.

12 **THE COURT:** MR. KENNEDY, HOW IS THIS A NON-HEARSAY
13 STATEMENT OF NOTICE OR HAVING INDEPENDENT SIGNIFICANT
14 RELEVANCE BESIDE THE HEARSAY CONTENT ITSELF? IT HAS TO
15 BE HEARSAY FIRST. AND THERE'S A QUESTION AS TO WHETHER
16 OR NOT IT'S HEARSAY IF IT'S NOTICE OR IF IT'S A STATEMENT
17 OF PRESENT INTENTION OF SOME KIND.

18 **MR. KENNEDY:** I HAVE NOT HEARD.

19 **THE COURT:** IT'S NOT A HEARSAY STATEMENT AT THAT
20 POINT.

21 **MR. KENNEDY:** I APOLOGIZE, YOUR HONOR. I HAVE NOT
22 HEARD ANY TESTIMONY TO THAT EFFECT, NOR DO I THINK THERE
23 CAN BE TESTIMONY. THIS IS AN OUT-OF-COURT STATEMENT.
24 I'D BE HAPPY TO REVIEW THE CASE THAT THE COURT IS
25 REFERRING TO.

26 **THE COURT:** I'M ON THAT SIDE OF THE CONUNDRUM. I
27 WILL SUSTAIN THE HEARSAY OBJECTION AFTER ARGUMENT.

28 GO AHEAD. NEXT QUESTION, PLEASE.

1 **BY MR. KANANI:**

2 **Q** DID MR. MORENO EVER IDENTIFY ANYBODY THAT
3 YOU REFERRED TO AS A MAN IN BLACK?

4 **MR. KENNEDY:** OBJECTION. CALLS FOR HEARSAY.

5 **THE COURT:** SUSTAINED.

6 **BY MR. KANANI:**

7 **Q** DID MR. MORENO EVER INDICATE -- I'M SORRY.
8 REPHRASE.

9 DID YOU EVER ASK MR. MORENO IF IT WAS SAFE
10 TO GO TO THE -- GO TO THE CAFÉ?

11 **A** YES, NUMEROUS TIMES.

12 **Q** ON HOW MANY OCCASIONS MORE OR LESS?

13 **A** NUMEROUS TIMES. ALMOST WEEKLY.

14 **Q** WAS THIS DONE THROUGHOUT THE -- THROUGHOUT
15 2017?

16 **A** IT STARTED END OF JUNE.

17 **Q** IN 2017?

18 **A** YEAH. AND CONTINUED.

19 **Q** DID YOU EVER SEE INDIVIDUALS -- I'M SORRY.
20 REPHRASE.

21 PREVIOUSLY YOU REFERENCED INDIVIDUALS YOU
22 DID NOT KNOW WHO WOULD PHOTOGRAPH YOU, AND YOU SAID THAT
23 THESE INDIVIDUALS WOULD PHOTOGRAPH YOU AT THE CAFÉ AND AT
24 YOUR HOME. DO YOU KNOW IF MR. MORENO EVER SAW ONE OF
25 THESE INSTANCES OF PEOPLE TAKING PICTURES OF YOU?

26 **MR. KENNEDY:** OBJECTION. CALLS FOR SPECULATION.

27 **THE COURT:** SUSTAINED.

28 **MR. KENNEDY:** HEARSAY.

1 **THE COURT:** YOU MAY REPHRASE THE QUESTION.

2 **BY MR. KANANI:**

3 **Q** WAS MR. MORENO PRESENT ON ANY OF THESE
4 OCCASIONS WHERE SOMEBODY YOU DID NOT KNOW PHOTOGRAPHED
5 YOU AT THE CAFÉ?

6 **A** YES. BUT I NEED TO MAKE A CORRECTION,
7 YOUR HONOR.

8 **THE COURT:** GO AHEAD.

9 **THE WITNESS:** IT WASN'T JUST AT THE CAFÉ. IT WAS
10 AS I WAS WALKING INTO THE CAFÉ AND OUT OF THE CAFÉ AND
11 CROSSING -- BECAUSE IT'S ACROSS THE STREET. AS I'M
12 WALKING IN AND WALKING OUT, THEY'RE ON THE PARKED CARS OR
13 WALKING AROUND WITH THE CAMERAS.

14 **BY MR. KANANI:**

15 **Q** WERE THEY STANDING ON THE SIDE OF THE STREET
16 WHICH THE CAFÉ IS ON OR THE SIDE WHERE ██████████ IS
17 ON?

18 **A** I WOULD SEE THEM ON BOTH SIDES.

19 **Q** AND YOU COULD CLEARLY SEE THEM HOLDING
20 CAMERAS POINTED AT YOU?

21 **A** YES. AND THEN --

22 **Q** DID YOU EVER --

23 **THE COURT:** WAIT FOR THE NEXT QUESTION, PLEASE.

24 **BY MR. KANANI:**

25 **Q** DID YOU EVER SEE ANY OF THESE MEN WITH
26 MR. OLSON?

27 **A** NO.

28 **Q** DID YOU EVER SEE ANY OF THESE MEN WITH

1 MR. ECONN?

2 **MR. KENNEDY:** OBJECTION. RELEVANCE.

3 **THE COURT:** OVERRULED.

4 **THE WITNESS:** I SAW SOME MEN WITH HIM, BUT I DID
5 NOT SEE THEM WITH THE CAMERA.

6 **BY MR. KANANI:**

7 **Q** SO YOU'RE UNSURE IF IT'S THE SAME MEN THAT
8 YOU SAW WITH MR. ECONN OR NOT?

9 **A** CORRECT.

10 **Q** DID ANYONE YOU KNOW EVER TELL YOU THAT THEY
11 SAW ANY ONE OF THESE MEN WITH MR. OLSON?

12 **MR. KENNEDY:** OBJECTION. CALLS FOR HEARSAY.

13 **THE COURT:** SUSTAINED.

14 **BY MR. KANANI:**

15 **Q** DO YOU REMEMBER WHEN THE CAMERAS WERE
16 INSTALLED AT [REDACTED]

17 **A** I THINK SOMETIME IN 2016.

18 **Q** AND DO YOU REMEMBER WHO REQUESTED THE
19 CAMERAS BE INSTALLED ORIGINALLY?

20 **A** MR. OLSON.

21 **Q** WERE YOU PRESENT WHEN HE MADE THIS REQUEST?

22 **A** HE TOLD ME THAT HE WAS GOING TO DO THAT.

23 **MR. KENNEDY:** OBJECTION. MOVE TO STRIKE.
24 CONTAINING HEARSAY STATEMENTS.

25 **THE COURT:** OVERRULED. THE ANSWER STANDS.

26 **BY MR. KANANI:**

27 **Q** DID HE EVER SAY WHY HE WANTED TO INSTALL
28 CAMERAS?

1 **MR. KENNEDY:** OBJECTION. CALLS FOR HEARSAY.

2 **THE COURT:** OVERRULED. GO AHEAD.

3 **THE WITNESS:** SO HE COULD WATCH WHAT I WAS DOING AT
4 THE ██████████.

5 **BY MR. KANANI:**

6 **Q** DID HE SPECIFICALLY MENTION YOU?

7 **A** YES.

8 **Q** DID YOU WANT THE CAMERAS TO BE INSTALLED?

9 **A** NO.

10 **Q** DID YOU VOICE YOUR OBJECTION ON THIS ISSUE?

11 **A** I TRIED TO BUT I WAS BLOCKED FROM --

12 **Q** WERE YOU PRESENT AT THE MEETING WHERE IT WAS
13 DECIDED TO INSTALL THESE CAMERAS?

14 **A** NO.

15 **Q** WERE YOU GIVEN NOTICE THAT THIS MEETING WAS
16 TAKING PLACE EVER?

17 **A** THEY POSTED A THING ON THE WALL BUT THEY DID
18 NOT SEND ME AN E-MAIL OR A LETTER, AND THEN THEY CHANGED
19 THE DATE AND I DID NOT KNOW ABOUT IT.

20 **Q** MS. ██████████, THERE IS -- REPHRASE.

21 DO YOU KNOW WHERE THE CAMERAS ARE PLACED
22 AROUND THE PROPERTY? AND BY "THE PROPERTY," I MEAN

23 ██████████

24 **A** YES.

25 **Q** DO YOU KNOW IF THERE'S ONE CAMERA THAT FACES
26 THE BACK DOOR OF YOUR UNIT?

27 **A** YES.

28 **Q** CAN IT SEE INSIDE YOUR UNIT?

1 **MR. KENNEDY:** OBJECTION. CALLS FOR SPECULATION.
2 EXPERT TESTIMONY.

3 **THE COURT:** IT DOES NOT CALL FOR EXPERT TESTIMONY.
4 BUT IT DOES CALL FOR SPECULATION. SUSTAINED ON THAT
5 GROUND.

6 **BY MR. KANANI:**

7 **Q** MS. ██████████, THERE WAS AN INCIDENT AT SOME
8 POINT IN 2016 REGARDING A LOCKBOX. DO YOU REMEMBER THIS
9 INCIDENT?

10 **MR. KENNEDY:** OBJECTION. LEADING.

11 **THE COURT:** OVERRULED.

12 **THE WITNESS:** YES.

13 **BY MR. KANANI:**

14 **Q** AFTER -- STRIKE THAT. REPHRASE.

15 WHAT WAS IN THE LOCKBOX?

16 **A** THE KEYS TO MY CONDO.

17 **Q** DID YOU HAVE ANY OTHER KEYS OTHER THAN THOSE
18 THAT WERE IN THE LOCKBOX AT THE TIME?

19 **A** I BELIEVE SO.

20 **Q** DO YOU REMEMBER WHO HAD POSSESSION OF THE
21 LOCKBOX FOR A TIME WHEN YOU DID NOT?

22 **A** YES.

23 **Q** WHO WAS IT?

24 **A** ELSA MONROY.

25 **Q** WHEN YOU ASKED FOR THE LOCKBOX BACK, WERE
26 YOU ABLE TO RETRIEVE IT?

27 **A** NO.

28 **Q** DID YOU CALL THE POLICE AT ANY POINT?

1 **A** YES.

2 **Q** DID THEY COME TO ASSIST YOU?

3 **A** YES.

4 **Q** WERE THEY SUCCESSFUL IN ASSISTING YOU TO
5 RETRIEVE YOUR LOCKBOX WITH YOUR KEYS FROM MS. MONROY?

6 **A** YES.

7 **Q** UPON RETURNING THE LOCKBOX, DID THEY GIVE
8 YOU ANY ADVISEMENTS?

9 **MR. KENNEDY:** OBJECTION. CALLS FOR HEARSAY.

10 **THE COURT:** SUSTAINED.

11 **BY MR. KANANI:**

12 **Q** AFTER THE INCIDENT WITH THE LOCKBOX,
13 MS. ██████████, DID YOU CONSIDER CHANGING THE LOCKS TO YOUR
14 UNIT?

15 **A** YES.

16 **Q** WHY DID YOU CONSIDER THAT?

17 **A** THE POLICE TOLD ME TO.

18 **Q** DID YOU ACTUALLY CHANGE THE LOCKS TO YOUR
19 UNIT?

20 **A** NO.

21 **Q** WHY NOT?

22 **A** BECAUSE I COULDN'T AFFORD IT.

23 **Q** MS. ██████████, HAVE YOU -- REPHRASE.

24 THROUGHOUT 2017, DID YOU SPEND A LOT OF TIME
25 LIVING AT ██████████ ON A CONSISTENT BASIS?

26 **A** TELL ME THE TIMEFRAME AGAIN.

27 **Q** THROUGHOUT 2017.

28 **A** NO.

1 Q WHY IS THAT?

2 A BECAUSE I WAS AFRAID.

3 Q WHO WERE YOU AFRAID OF?

4 A MR. OLSON.

5 Q WHERE DID YOU LIVE INSTEAD OF [REDACTED]

6 [REDACTED]

7 **THE COURT:** YOU DON'T HAVE TO ANSWER THAT QUESTION.
8 SHE HAS A REQUEST FOR RESTRAINING ORDERS. AND IF SHE HAS
9 TO GO TO ANOTHER LOCATION BECAUSE OF FEAR FOR SAFETY, SHE
10 NEED NOT DISCLOSE THAT IN OPEN COURT ON THE RECORD. JUST
11 SHE WENT SOMEPLACE ELSE IS SUFFICIENT.

12 **BY MR. KANANI:**

13 Q DID YOU LIVE SOMEWHERE ELSE DURING THAT
14 TIME?

15 A WELL, I DID NOT HAVE A RESTRAINING ORDER AT
16 THAT TIME.

17 **THE COURT:** BUT YOU ULTIMATELY GOT A RESTRAINING
18 ORDER IN 2017; CORRECT?

19 **THE WITNESS:** YEAH, LATER. OKAY.

20 **THE COURT:** I DON'T WANT YOU TO EVEN
21 INADVERTENTLY -- AND IT APPLIES TO BOTH PARTIES --
22 DISCLOSE YOUR OTHER LOCATIONS OTHER THAN THE [REDACTED].
23 IT'S NOT PERMITTED. NOT EVEN I CAN ASK THAT QUESTION.

24 **BY MR. KANANI:**

25 Q YOU WERE LIVING SOMEWHERE ELSE FOR A TIME;
26 CORRECT?

27 A YES.

28 Q DID ANY INDIVIDUALS ATTEMPTING TO BUY YOUR

1 UNIT SHOW UP AT THIS OTHER LOCATION THAT YOU WERE LIVING?

2 **MR. KENNEDY:** OBJECTION. RELEVANCE.

3 **THE COURT:** OVERRULED. SEEMS TO ESTABLISH
4 FOUNDATION FOR SOMETHING ELSE.

5 **THE WITNESS:** YES.

6 **BY MR. KANANI:**

7 **Q** AND DID YOU KNOW -- I'M SORRY. REPHRASE.
8 HAD YOU EVER MET THESE INDIVIDUALS PRIOR TO
9 THEM SHOWING UP AT THIS OTHER RESIDENCE THAT YOU HAD?

10 **A** WELL --

11 **Q** HAD YOU EVER MET IN PERSON THESE INDIVIDUALS
12 WHO SHOWED UP AT THIS OTHER RESIDENCE THAT YOU HAD?

13 **A** NO.

14 **Q** WHY DID SHE SHOW UP AT YOUR HOUSE?

15 **MR. KENNEDY:** CALLS FOR SPECULATION.

16 **THE COURT:** OVERRULED.

17 **THE WITNESS:** JUST THEY WERE CALLING AND SENDING
18 LETTERS.

19 **BY MR. KANANI:**

20 **Q** SO THEY NEVER ACTUALLY APPEARED IN PERSON?

21 **A** NO.

22 **Q** WHY WERE THEY CONTACTING YOU AT THIS
23 LOCATION?

24 **A** BECAUSE THEY WANTED TO BUY MY CONDO.

25 **Q** DID YOU TELL THEM WHERE YOU WERE LIVING AT
26 THE TIME?

27 **A** NO.

28 **Q** DID YOU TELL ANYONE ELSE WHERE YOU WERE

1 LIVING AT THE TIME?

2 **A** NO.

3 **Q** WHEN THEY STARTED CONTACTING YOU THERE WITH
4 PHONE CALLS AND LETTERS, DID ANYONE ELSE LIVING WITH YOU
5 AT THIS OTHER LOCATION INDICATE THAT THEY HAD TOLD THESE
6 INDIVIDUALS WHERE YOU WERE STAYING?

7 **MR. KENNEDY:** CALLS FOR HEARSAY.

8 **THE COURT:** SUSTAINED.

9 **BY MR. KANANI:**

10 **Q** WERE THEY EVER SUCCESSFUL IN PURCHASING YOUR
11 UNIT, MS. [REDACTED]?

12 **A** NO.

13 **Q** HAS MR. OLSON EVER TRIED TO PURCHASE YOUR
14 UNIT?

15 **A** WELL, HE TRIED TO FORECLOSE ON IT. IS THAT
16 THE SAME THING?

17 **Q** NO, IT'S NOT.

18 HAS HE EVER OFFERED YOU MONEY OR SOMETHING
19 ELSE OF VALUE FOR OWNERSHIP OF YOUR UNIT AT [REDACTED]
20 [REDACTED] OUTSIDE OF ANY SORT OF SETTLEMENT DISCUSSIONS OR
21 ANYTHING THAT WOULD BE CONFIDENTIAL OR PRIVILEGED?

22 **MR. KENNEDY:** OBJECTION. RELEVANCE.

23 **THE COURT:** SUSTAINED. YOU MAY REPHRASE.

24 **THE WITNESS:** I DON'T UNDERSTAND.

25 **BY MR. KANANI:**

26 **Q** HAS MR. OLSON EVER MADE YOU AN OFFER ON YOUR
27 UNIT?

28 **MR. KENNEDY:** OBJECTION. RELEVANCE.

1 **THE COURT:** OVERRULED. GO AHEAD.

2 **THE WITNESS:** HIS OFFER WAS JUST FOR ME TO GET OUT.
3 SO I -- GET OUT OR I WON'T -- HIS OFFER IS, IF YOU GET
4 OUT, I WON'T SUE YOU. THAT WAS HIS OFFER.

5 **BY MR. KANANI:**

6 **Q** BUT HE DID NOT OFFER YOU MONEY TO GET OUT?

7 **A** NO.

8 **Q** HAS ANYONE FROM NEXUS DEVELOPMENT EVER TRIED
9 TO PURCHASE YOUR UNIT FROM YOU?

10 **MR. KENNEDY:** OBJECTION. RELEVANCE.

11 **THE COURT:** SUSTAINED. ALSO HEARSAY.

12 **BY MR. KANANI:**

13 **Q** HAVE YOU EVER SPOKEN WITH AN INDIVIDUAL
14 NAMED CORY ALDER?

15 **A** YES.

16 **Q** WHO IS HE, IF YOU KNOW?

17 **A** HE'S THE PRESIDENT OF MR. OLSON'S COMPANY.

18 **Q** AND DID YOU HAVE A PHONE CALL WITH HIM AT
19 SOME POINT IN 2016 -- I'M SORRY.

20 DID HE EVER CALL YOU AT SOME POINT AFTER
21 2005, I BELIEVE?

22 **THE COURT:** SO --

23 **MR. KENNEDY:** OBJECTION. RELEVANCE.

24 **THE COURT:** -- I'LL INTERPOSE THE COURT'S OWN
25 OBJECTION, 352 AND THE COURT'S ADMONITIONS. BRING IT TO
26 THE CURRENT EVENTS THAT ARE THE SUBJECT OF THESE TWO
27 RESTRAINING ORDER REQUESTS, PLEASE.

28 ///
29

1 **BY MR. KANANI:**

2 Q MS. [REDACTED], HAVE YOU EVER MET AN
3 INDIVIDUAL NAMED LENNY DYKSTRA?

4 A YES.

5 Q WHEN DID YOU MEET HIM?

6 A I MET HIM, I THINK IT WAS APRIL, 2017.

7 Q AND WHAT WAS YOUR RELATIONSHIP WITH
8 MR. DYKSTRA AT THE TIME?

9 A WELL, HE ORIGINALLY GAVE ME A FAKE NAME AND
10 ASKED TO RENT A ROOM IN MY PROPERTY.

11 **MR. KENNEDY:** OBJECTION. MOVE TO STRIKE AS
12 HEARSAY.

13 **THE COURT:** OVERRULED.

14 **BY MR. KANANI:**

15 Q WHAT WAS THE NAME HE GAVE YOU?

16 A KYLE SOMETHING.

17 Q WHEN DID HE REVEAL HIS TRUE NAME?

18 **THE COURT:** NOW WE'RE IN 352 TERRITORY. IT DOES
19 NOT REALLY RELATE TO MR. OLSON UNLESS YOU CONNECT IT UP
20 FIRST, PLEASE.

21 **BY MR. KANANI:**

22 Q DID LENNY DYKSTRA EVER OFFER YOU MONEY TO BE
23 IN A RELATIONSHIP WITH HIM?

24 **MR. KENNEDY:** CALLS FOR HEARSAY. RELEVANCE.

25 **THE COURT:** SUSTAINED. CONNECT IT UP TO THE
26 RELEVANT ALLEGATIONS OR IT'S NOT RELEVANT. IT MIGHT BE
27 RELEVANT TO THE OTHER MATTERS PENDING IN COURT'S OTHER
28 PLACES BUT NOT HERE.

1 **BY MR. KANANI:**

2 **Q** DID MR. DYKSTRA EVER MENTION MR. OLSON?

3 **MR. KENNEDY:** CALLS FOR HEARSAY.

4 **THE COURT:** OVERRULED. "YES" OR "NO"?

5 **THE WITNESS:** NO.

6 **BY MR. KANANI:**

7 **Q** DID MR. OLSON EVER MENTION THAT HE KNEW
8 MR. DYKSTRA?

9 **A** NO.

10 **Q** MS. [REDACTED] --

11 **THE COURT:** HOLD ON.

12 MS. [REDACTED] -- THIS IS THE SECOND TIME NOW
13 SHE'S TRIED TO TALK TO ME DIRECTLY. YOU'RE NOT ALLOWED
14 TO DO THAT. YOUR ATTORNEY IS ASKING YOU QUESTIONS.

15 **THE WITNESS:** I'M SORRY.

16 **THE COURT:** IF YOU AND YOUR ATTORNEY WANT TO TALK
17 PRIVATELY, YOU MAY. BUT THE ATTORNEY CONTROLS THE
18 EXAMINATION. LET HIM CONDUCT THE EXAMINATION, PLEASE.

19 **BY MR. KANANI:**

20 **Q** MS. [REDACTED], DO YOU REMEMBER THE
21 INCIDENT -- I DON'T REMEMBER THE EXACT DATE -- BUT THE
22 INCIDENT THAT MR. OLSON HAS REFERRED TO IN WHICH HE
23 CLAIMS THAT TWO MEN ACCOSTED HIM?

24 **A** DO I REMEMBER THIS?

25 **Q** YES.

26 **A** YES, FROM THE TESTIMONY.

27 **Q** AND WERE YOU PRESENT ON THIS DAY?

28 **A** YES.

1 **Q** WHO ELSE WAS PRESENT BESIDES YOU AND
2 MR. OLSON?

3 **A** TWO FRIENDS OF MINE. TITUS FOTSO AND MILDER
4 AREGULA (PHONETICALLY). I'M NOT SURE HOW TO SPELL THE
5 LAST NAME, BUT M-I-L-D-E-R.

6 **Q** DURING THIS TIME, DID YOU EVER VIEW OR HEAR
7 MILDER THREATEN MR. OLSON?

8 **A** NO.

9 **Q** DID YOU EVER VIEW OR HEAR HIM ATTACK
10 MR. OLSON?

11 **A** NO.

12 **Q** DID YOU EVER VIEW OR HEAR HIM PHYSICALLY
13 TOUCH MR. OLSON?

14 **A** NO.

15 **Q** THE SAME QUESTION FOR MR. FOTSO.
16 DID YOU EVER HEAR HIM -- VIEW OR HEAR HIM
17 THREATEN MR. OLSON?

18 **A** NO.

19 **Q** DID YOU EVER VIEW OR HEAR HIM TOUCH
20 MR. OLSON?

21 **A** NO.

22 **Q** DID YOU EVER VIEW OR HEAR HIM ATTACK OR
23 INJURE, MR. OLSON?

24 **A** NO.

25 **Q** WERE YOU, MR. FOTSO, AND MILDER DRINKING ANY
26 ALCOHOL ON THAT DAY?

27 **A** I BELIEVE THAT MILDER AND MR. FOTSO HAD A
28 GLASS OF WINE.

1 **Q** DID THEY HAVE ONE GLASS OF WINE EACH?

2 **A** I'M NOT EXACTLY SURE.

3 **Q** DO YOU KNOW HOW MUCH ALCOHOL THEY DRANK
4 BETWEEN THE TWO OF THEM?

5 **A** MAYBE, YOU KNOW, A GLASS EACH.

6 **Q** AND WERE EITHER -- WAS ANYONE -- AND ANYONE
7 COULD BE -- I'LL REPHRASE.

8 WAS ANYONE PRESENT ON THAT DAY DRUNK?

9 **A** NO.

10 **MR. KANANI:** AT THIS TIME, YOUR HONOR, I WOULD LIKE
11 TO PLAY ACTUALLY RESPONDENT'S OR MR. OLSON'S EXHIBIT GG.

12 **THE COURT:** GG.

13 **MR. KANANI:** IT'S A BRIEF VIDEO THAT I BELIEVE --

14 **THE COURT:** DOES IT HAVE ANY AUDIO?

15 **MR. KANANI:** IT DOES. I'M SORRY. BUT WE CAN PLAY
16 IT WITHOUT THE AUDIO. THE VIDEO IS ALL WE NEED TO SHOW
17 THE WITNESS AT THIS TIME.

18 **THE COURT:** HOW LONG IS THE VIDEO?

19 **MR. KANANI:** A MINUTE TWENTY-FOUR.

20 **THE COURT:** ALL RIGHT. DO YOU WANT TO SET THAT UP?
21 WHY DON'T WE TAKE A BREAK WHILE YOU SET THAT UP. I THINK
22 YOUR CLIENT WANTS TO TALK TO YOU. THAT IS HER RIGHT. IF
23 YOU TWO WANT TO TALK PRIVATELY OUT IN THE HALLWAY. SET
24 UP THE VIDEO. AND I WILL COME BACK WHEN YOU TELL MY
25 STAFF THAT YOU'RE READY.

26 **MR. KANANI:** THANK YOU, YOUR HONOR.

27

28 (A BRIEF RECESS WAS TAKEN.)

1 **THE COURT:** BACK ON THE RECORD.

2 PETITIONER, MS. [REDACTED], BACK ON THE
3 WITNESS STAND. AND YOU HAVE THE VIDEO CUED UP THAT YOU
4 WANT.

5 **MR. KANANI:** YES. SORRY.

6 **THE COURT:** DID YOU SAY NUMBER GG?

7 **MR. KANANI:** RESPONDENT'S GG.

8 **THE COURT:** GO AHEAD.

9 **MR. KENNEDY:** YOUR HONOR, WE'LL STIPULATE TO
10 ADMISSIBILITY IF YOU WANT TO LOOK AT IT AS WELL.

11 **THE COURT:** DOES THE PETITIONER MS. [REDACTED]
12 STIPULATE TO ITS ADMISSIBILITY?

13 **MR. KANANI:** YES, YOUR HONOR.

14 **THE COURT:** ADMITTED INTO EVIDENCE.

15

16 (EXHIBIT GG WAS RECEIVED INTO EVIDENCE.)

17

18 **MR. KANANI:** WE'RE READY.

19 **THE COURT:** COME ON OVER AND POSITION YOURSELVES
20 AND THEN --

21 **MR. KENNEDY:** WE'RE NOT PLAYING THE AUDIO?

22 **THE COURT:** NO AUDIO.

23 **MR. KANANI:** THE AUDIO IS OFF.

24 **THE COURT:** I'LL STAND BEHIND HERE. OFF THE RECORD
25 WHILE THE VIDEO GG ADMITTED INTO EVIDENCE IS PLAYED.
26 VIDEO ONLY. NOT AUDIO. OFF THE RECORD. PLAY IT.

27

28 (VIDEOTAPE BEING PLAYED OFF THE RECORD.)

1 **THE COURT:** BACK ON THE RECORD. GO AHEAD.

2 **BY MR. KANANI:**

3 **Q** MS. ██████████, DID YOU GET A GOOD LOOK AT THE
4 VIDEO THAT I JUST PLAYED FOR YOU AS RESPONDENT'S GG?

5 **A** YES.

6 **Q** DO YOU BELIEVE THAT IT ACCURATELY REPRESENTS
7 WHAT HAPPENED ON THAT DAY REGARDING THE INCIDENT THAT IS
8 THE BASIS OF MR. OLSON'S REQUEST FOR RESTRAINING ORDER?

9 **MR. KENNEDY:** OBJECTION. RELEVANCE.

10 **THE COURT:** IT'S ARGUMENTATIVE QUESTION. FIRST
11 HALF OF IT WASN'T. THE SECOND HALF WAS.

12 **BY MR. KANANI:**

13 **Q** DO YOU BELIEVE IT ACCURATELY REPRESENTS THE
14 EVENTS OF THAT DAY?

15 **A** YES.

16 **Q** MS. ██████████, DID MR. DYKSTRA EVER ASK YOU
17 ABOUT A LAWSUIT THAT YOU HAD PENDING AGAINST MR. OLSON?

18 **MR. KENNEDY:** OBJECTION. RELEVANCE.

19 **THE COURT:** HEARSAY. SUSTAINED.

20 **BY MR. KANANI:**

21 **Q** YOU HAVE A LAWSUIT PENDING AGAINST
22 MR. OLSON; CORRECT?

23 **A** YES.

24 **Q** WERE DOCUMENTS IN YOUR HOME EVER -- I'M
25 SORRY. REPHRASE.

26 WAS ANYTHING EVER STOLEN FROM YOUR UNIT?

27 **A** YES.

28 **Q** DO YOU REMEMBER WHAT WAS STOLEN FROM YOUR

1 UNIT?

2 **A** DOCUMENTS REGARDING EVIDENCE IN MY LAWSUIT.

3 **Q** WHICH LAWSUIT WOULD THAT BE?

4 **A** WITH MR. OLSON.

5 **Q** DO YOU KNOW WHO IT WAS THAT STOLE THOSE
6 DOCUMENTS?

7 **A** LENNY DYKSTRA.

8 **Q** MS. [REDACTED] -- I'M SORRY. REPHRASE.

9 WAS THERE A BOARD MEETING FOR THE [REDACTED]
10 [REDACTED] HOMEOWNER'S ASSOCIATION IN THE LAST TWO OR THREE
11 MONTHS?

12 **A** YES.

13 **Q** AT THAT BOARD MEETING, WAS THE ISSUE OF
14 SECURITY EVER DISCUSSED?

15 **A** YES.

16 **MR. KENNEDY:** OBJECTION. CALLS FOR HEARSAY.

17 **THE COURT:** OVERRULED. DID YOU ANSWER YES?

18 **THE WITNESS:** YES.

19 **BY MR. KANANI:**

20 **Q** WHAT -- DID ANYONE MAKE A SUGGESTION
21 REGARDING -- I'M SORRY. STRIKE THAT. REPHRASE.

22 WHAT WAS THE DISCUSSION ON SECURITY
23 REGARDING?

24 **A** THAT MR. OLSON WANTED MORE SECURITY. HE
25 WANTED 24-HOUR SECURITY PEOPLE AT THE FRONT AND BACK DOOR
26 CHECKING I.D.'S OF PEOPLE COMING IN.

27 **Q** DID HE REQUEST THAT I.D.'S BE CHECKED OF
28 EVERY INDIVIDUAL COMING IN AND OUT OF [REDACTED]

1 **A** YES.

2 **Q** WERE HOMEOWNERS EXEMPT FROM THIS REQUIREMENT
3 UNDER MR. OLSON'S SUGGESTION? IF YOU KNOW?

4 **A** I DON'T KNOW EXACTLY HOW. I DON'T KNOW.

5 **Q** WAS THIS SUGGESTION EVER IMPLEMENTED?

6 **A** NO.

7 **Q** WHAT WAS YOUR POSITION ON THIS SUGGESTION?

8 **A** WELL, I THOUGHT IT WOULD BE REALLY EXPENSIVE
9 AND UP THE HOA FEES. I DID NOT THINK IT WAS NECESSARY.
10 COULD I SAY SOMETHING ELSE?

11 **Q** DO YOU HAVE MORE TO SAY, MS. [REDACTED]?

12 **A** YEAH.

13 **Q** PLEASE CONTINUE.

14 **A** I WAS AFRAID THAT THIS WAS A WAY FOR HIM TO
15 FIND OUT PEOPLE, FRIENDS OF MINE WHO COME TO VISIT ME, TO
16 GET THEIR NAMES AND THEIR ADDRESSES SO HE COULD THEN
17 STALK THEM.

18 **Q** OKAY. MS. [REDACTED], DID ANYONE EVER TELL
19 YOU THAT -- STRIKE THAT.

20 DID YOU EVER SEE MEN IN BLACK -- MEN DRESSED
21 IN BLACK AT THE CAFÉ?

22 **A** YES.

23 **Q** DO YOU BELIEVE THAT THESE MEN WERE WATCHING
24 YOU?

25 **A** YES.

26 **Q** WHAT MAKES YOU BELIEVE THAT?

27 **A** BECAUSE WHEN I WOULD COME AND SIT IN, YOU
28 COULD FEEL -- THERE'S A FEELING THAT YOU FEEL SOMEONE IS

1 WATCHING YOU. YOU GET THIS FEELING THAT SOMEONE IS
2 LOOKING AT YOU. AND I WOULD TURNAROUND AND LOOK, EITHER
3 THEY WOULD BE OVER THERE AND THEY WOULD BE IN THE -- THE
4 CAFÉ OPENS UP TO THE LOBBY. AND ONE TIME THERE WAS A MAN
5 HOLDING A VIDEO CAMERA FILMING ME. AN IPHONE. AND I
6 TURNED TO PASTOR AMADO, AND I SAID, DO YOU SEE HIM? YEAH
7 I SEE HIM. AND SO -- AND THEN HE --

8 Q ANY OTHER INCIDENTS THAT WOULD MAKE YOU
9 BELIEVE THESE MEN WERE WATCHING YOU?

10 A YES.

11 Q CAN YOU DESCRIBE ONE OF THEM AT THIS TIME?

12 A OKAY. I'M AT THE BAR AREA, AND I HAVE MY
13 BACK TO THE PEOPLE BEHIND ME AND AMADO WOULD BE STANDING
14 IN FRONT. AND HE WOULD TELL ME THE ONE OVER THERE, HE'S
15 STARING AT YOU. HE HAS A CLIPBOARD AND LOOKS LIKE HE'S
16 WRITING NOTES. AND HE WOULD SAY THEY COME IN TO -- THEY
17 COME IN WHEN YOU'RE THERE AND THEN THEY LEAVE RIGHT AFTER
18 YOU LEAVE. DON'T SEEM TO BE EATING ANY FOOD. THEY ARE
19 THERE WHEN YOU'RE THERE OR -- THAT IS WHEN HE TOLD ME TO
20 STOP COMING AROUND. THEY WOULD COME IN AND LOOK AROUND
21 AND THEN LEAVE.

22 Q DID YOU EVER SEE ANY OF THESE INDIVIDUALS
23 ORDER A MEAL?

24 A NO.

25 Q DID YOU EVER SEE ANY OF THESE INDIVIDUALS
26 HAVE A DRINK AT THE CAFÉ?

27 A ONE PERSON DID CAME UP TO THE BAR AREA AND
28 THEN, LIKE, WATCHED ME.

1 **Q** DO YOU REMEMBER WHEN THIS HAPPENED, WHAT
2 YEAR?

3 **A** THIS WAS IN 2017.

4 **Q** WAS IT TOWARDS THE BEGINNING, MIDDLE, OR END
5 OF 2017?

6 **A** FALL. THE END.

7 **Q** AND HOW FREQUENTLY WOULD THIS HAPPEN WHEN
8 YOU WOULD GO TO THE CAFÉ?

9 **A** EVERY TIME.

10 **Q** AND IS THAT WHY YOU STOPPED GOING -- IS THAT
11 ONE OF THE REASONS WHY YOU STOPPED GOING TO THE CAFÉ?

12 **A** YES.

13 **Q** MS. ██████████, DO YOU KNOW HOW LONG
14 MR. MORENO WORKED AT THE CAFÉ?

15 **MR. KENNEDY:** OBJECTION. RELEVANCE.

16 **THE COURT:** OVERRULED.

17 **THE WITNESS:** DECADES.

18 **BY MR. KANANI:**

19 **Q** MORE THAN TEN YEARS?

20 **A** DEFINITELY.

21 **Q** IS HE STILL WORKING AT THE CAFÉ?

22 **A** NO.

23 **Q** WHEN DID HE QUIT -- I'M SORRY.

24 WHEN DID HE STOP WORKING THERE, IF YOU KNOW?

25 **A** YES. I GOT BACK TO THE UNITED STATES IN THE
26 BEGINNING OF JUNE. I HAD SPOKEN TO HIM ON A SATURDAY,
27 AND HE -- I SAID HOW IS EVERYTHING GOING? ARE THEY STILL
28 COMING THERE?

1 **THE COURT:** THE QUESTION WAS WHEN DID HE STOP
2 WORKING THERE?

3 **THE WITNESS:** SO I BELIEVE IT WAS A MONDAY ON -- IN
4 JUNE, LIKE THE BEGINNING OF JUNE, HE JUST DID NOT SHOW UP
5 AT WORK.

6 **BY MR. KANANI:**

7 **Q** IS THAT JUNE OF 2017 OR 2018?

8 **A** 2018.

9 **Q** AND DID HE TELL YOU THAT HE WAS GOING TO
10 QUIT?

11 **MR. KENNEDY:** OBJECTION. CALLS FOR HEARSAY.

12 **THE COURT:** SUSTAINED.

13 **BY MR. KANANI:**

14 **Q** DO YOU KNOW IF HE WAS QUIT OR FIRED OR
15 SIMPLY JUST DID NOT SHOW UP TO WORK ONE DAY?

16 **MR. KENNEDY:** CALLS FOR SPECULATION.

17 **THE COURT:** SUSTAINED.

18 MS. ██████████, YOU JUST SPOKE LOUD ENOUGH FOR
19 ME TO HEAR YOU. I DID NOT HEAR QUITE THE WORDS THAT YOU
20 SAID, BUT YOUR SAYING SOMETHING INDICATES TO ME THAT YOU
21 MIGHT BE SIGNALING TO YOUR ATTORNEY. THIS IS NOW THE
22 THIRD ADMONITION THAT I HAVE GIVEN YOUR SIDE THIS
23 MORNING. THE NEXT ADMONITION WILL TERMINATE THE EVIDENCE
24 UNDER 765. BEHAVE YOURSELVES IN COURT. CONDUCT
25 YOURSELVES WITH CIVILITY. AND IT HURTS YOUR CASE WHEN
26 YOU DO THAT BECAUSE IT REFLECTS ADVERSELY ON YOUR
27 CREDIBILITY.

28 IF YOU WANT TO KEEP DOING IT WITHOUT

1 ADMONITIONS, THAT IS FINE TOO. IT KEEPS WORKING AGAINST
2 YOU WHEN YOU DO THAT AND BEHAVE LIKE THAT IN COURT. I
3 TOLD YOU ALL IN THE BEGINNING THAT I WILL BE WATCHING AND
4 I AM. CORRECT THE BEHAVIOR.

5 NEXT QUESTION.

6 **BY MR. KANANI:**

7 **Q** ARE YOU AWARE OF AN INDIVIDUAL NAMED MICHAEL
8 ABNEY?

9 **A** YES.

10 **Q** WHO IS HE?

11 **A** HE'S A HAIRDRESSER AT THE HOTEL, THE SALON
12 HAIRCUTTER.

13 **Q** HOW IS HE RELATED TO THIS CASE?

14 **A** HE STARTED ALSO WANTING TO KNOW WHERE I WAS
15 AND ASKING ABOUT ME ALL THE TIME.

16 **Q** IS MR. ABNEY STILL WORKING AT THE HOTEL?

17 **A** I DON'T KNOW. I DON'T GO THERE.

18 **Q** ARE YOU AWARE OF A CHEF AT THE HOTEL WITH
19 THE LAST NAME MARTINEZ?

20 **A** YES.

21 **Q** WHY IS HE RELATED TO THIS CASE?

22 **A** HE WAS ONE OF THE PEOPLE THAT AMADO MORENO
23 TOLD ME WAS -- HAD BECOME AN INFORMANT FOR MR. OLSON.

24 **Q** ARE YOU AWARE OF A BUSBOY AT THE CAFÉ WITH
25 THE FIRST NAME OF RONNY?

26 **A** YES.

27 **Q** DID RONNY WORK WITH A PARTICULAR WAITER AT
28 THE CAFÉ?

1 **A** YES.

2 **Q** WHICH WAITER DID HE WORK WITH?

3 **A** AMADO MORENO.

4 **Q** WHY IS RONNY RELATED TO THIS CASE?

5 **A** BECAUSE HE ALSO WITNESSED THE MEN IN BLACK,
6 AND MR. OLSON WITH THE MEN IN BLACK.

7 **MR. KANANI:** NOTHING FURTHER AT THIS TIME,
8 YOUR HONOR.

9 **THE COURT:** CROSS-EXAMINATION.

10
11 **CROSS-EXAMINATION**

12 **BY MR. KENNEDY:**

13 **Q** MS. ██████████, DID YOU EVER SEE MR. OLSON
14 WITH THESE ALLEGED MEN IN BLACK?

15 **A** NO.

16 **Q** DID YOU EVER SEE MR. OLSON WITH THE CHEF
17 MR. MARTINEZ?

18 **A** NO.

19 **Q** DID YOU EVER SEE MR. OLSON WITH THE
20 HAIRDRESSER MR. ABNEY?

21 **A** NO.

22 **Q** DID YOU EVER SEE MR. OLSON WITH THE FORMER
23 PROFESSIONAL BASEBALL PLAYER LENNY DYKSTRA?

24 **A** NO.

25 **Q** YOU MENTIONED THAT MR. OLSON WANTED MORE
26 SECURITY MEASURES AT THE ██████████; RIGHT?

27 **A** YES.

28 **Q** WOULDN'T IT MAKE IT MORE DIFFICULT FOR HIM

1 TO HARASS YOU?

2 **A** COULD YOU ASK THE QUESTION AGAIN?

3 **THE COURT:** PLEASE.

4 **MR. KENNEDY:** I'LL WITHDRAW IT.

5 LET'S TURN TO EXHIBIT NUMBER J.

6 MAY I APPROACH?

7 **THE COURT:** YOU MAY APPROACH.

8 TURN TO TAB J, PLEASE.

9 J IS ALREADY ADMITTED INTO EVIDENCE.

10 **BY MR. KENNEDY:**

11 **Q** WILL YOU PLEASE TURN TO THE PAGE THAT IS
12 NUMBERED TRIAL EXHIBIT J.0006.

13 **THE COURT:** THE BOTTOM, DO YOU SEE THE NUMBERS?

14 **THE WITNESS:** THANK YOU.

15 **BY MR. KENNEDY:**

16 **Q** IS THAT YOUR SIGNATURE?

17 **A** YES.

18 **Q** HAVE YOU SEEN THIS DOCUMENT BEFORE?

19 **A** YES.

20 **Q** IS THIS THE REQUEST FOR CIVIL HARASSMENT
21 RESTRAINING ORDER THAT YOU SUBMITTED IN THIS CASE?

22 **A** COULD I TAKE A MOMENT TO LOOK AT IT?

23 **Q** PLEASE DO.

24

25 (PAUSE IN THE PROCEEDINGS.)

26

27 **THE WITNESS:** OKAY.

28 ///

1 **BY MR. KENNEDY:**

2 **Q** IS THIS THE REQUEST FOR CIVIL HARASSMENT
3 RESTRAINING ORDER THAT YOU SUBMITTED IN THIS CASE?

4 **A** I BELIEVE SO.

5 **MR. KENNEDY:** YOUR HONOR, I WOULD ASK THAT THIS
6 TRIAL EXHIBIT J BE ADMITTED INTO EVIDENCE.

7 **THE COURT:** ALREADY DONE ON DAY ONE. IT WAS
8 STIPULATED.

9 **MR. KENNEDY:** EVEN EASIER. THANK YOU.

10 **THE COURT:** THANK YOU, MR. KANANI.

11 **BY MR. KENNEDY:**

12 **Q** COULD YOU PLEASE TURN TO TRIAL
13 EXHIBIT J.0003 -- ACTUALLY. I'M SORRY. 0002. SORRY.

14 **A** OKAY.

15 **Q** DO YOU SEE PARAGRAPH SEVEN --

16 **A** YES.

17 **Q** -- WHERE IT SAYS DESCRIPTION OF HARASSMENT?

18 **A** YES.

19 **Q** DO YOU SEE SUBHEADING A-1?

20 **A** YES.

21 **Q** WHEN -- WHERE IT SAYS WHEN DID IT HAPPEN?

22 **A** WHICH SECTION AGAIN?

23 **Q** PARAGRAPH SEVEN, SUBHEADING A-1?

24 **A** YES. OKAY.

25 **Q** WHAT IS THE DATE THAT YOU LISTED THERE?

26 **A** SATURDAY, SEPTEMBER 2.

27 **Q** WHAT SPECIFICALLY DO YOU ALLEGE MR. OLSON
28 DID ON SATURDAY, SEPTEMBER 2, 2017?

1 **A** THAT IS WHEN THE MEN IN BLACK THAT AMADO
2 MORENO HAD SEEN AND I HAD SEEN WERE FOLLOWING --
3 PHOTOGRAPHING.

4 **Q** WHERE DO YOU REFERENCE THE MEN IN BLACK IN
5 THIS APPLICATION?

6 **A** WELL, I'M NOT AN ATTORNEY. SO I -- MAYBE I
7 DID NOT FILL IT OUT CORRECTLY.

8 **Q** LET'S TURN TO THE NEXT PAGE.

9 DO YOU SEE SUBSECTION THREE AT THE TOP?

10 **A** YES.

11 **Q** PLEASE READ THAT PARAGRAPH TO YOURSELF AND
12 TELL ME IF YOU SEE REFERENCE TO THE MEN IN BLACK.

13
14 (PAUSE IN THE PROCEEDINGS.)

15
16 **THE WITNESS:** OKAY.

17 **BY MR. KENNEDY:**

18 **Q** DO YOU SEE A REFERENCE TO THE MEN IN BLACK?

19 **A** NO.

20 **Q** AND THE SAME QUESTION FOR PARAGRAPH FOUR,
21 SUBPARAGRAPH FOUR FOR THE RECORD, I NOTE THAT THREE IS
22 HOW DID THE PERSON HARASS YOU. SUBPARAGRAPH FOUR IS
23 TITLED DID THE PERSON --

24 **MR. KANANI:** OBJECTION. CUMULATIVE.

25 **THE COURT:** THERE'S NO QUESTION PENDING YET.
26 DISREGARD WHAT MR. KENNEDY SAID. FRAME A QUESTION.

27 **BY MR. KENNEDY:**

28 **Q** SAME QUESTION FOR PARAGRAPH FOUR, IS THERE A

1 REFERENCE TO THE MEN IN BLACK?

2 **A** NO.

3 **Q** PARAGRAPH FIVE, SAME QUESTION?

4 **A** NO.

5 **Q** SO ALTHOUGH, AS OF SEPTEMBER 2, YOU WERE
6 AWARE OF THE ALLEGED SURVEILLANCE OF THE MEN IN BLACK,
7 YOU DID NOT INCLUDE THAT IN THE RESTRAINING ORDER
8 APPLICATION?

9 **MR. KANANI:** OBJECTION. MISSTATES FACTS NOT IN
10 EVIDENCE.

11 **THE COURT:** OVERRULED. ANSWER PLEASE.

12 **THE WITNESS:** WHAT IS THE QUESTION?

13 **THE COURT:** REPEAT, OR WOULD YOU LIKE IT READ BACK?

14 **MR. KENNEDY:** I CAN REPEAT IT.

15 **Q** ALTHOUGH AS OF SEPTEMBER 2 YOU WERE AWARE OF
16 THE MEN IN BLACK'S ALLEGED SURVEILLANCE OF YOU, YOU DID
17 NOT ADD THAT ALLEGATION INTO YOUR RESTRAINING ORDER
18 APPLICATION, DID YOU?

19 **A** I THOUGHT THAT BY SAYING I WAS BEING
20 SURVEILLED, I DID NOT KNOW I HAD TO IDENTIFY THEM AS,
21 QUOTE, MEN IN BLACK.

22 **Q** LET'S TALK ABOUT THE SURVEILLANCE FOR A
23 MOMENT. YOU REFERENCED -- I THINK YOU WERE TALKING ABOUT
24 IS PARAGRAPH THREE. AND IN LOOKING AT THE THINGS THAT
25 YOU SAID IN THIS PARAGRAPH, YOU SAY HE'S CURRENTLY
26 STALKING ME.

27 WHEN DID THAT HAPPEN?

28 **A** SO IT --

1 **Q** LET ME CLARIFY THE QUESTION.

2 WHEN SINCE -- IN THIS TIMEFRAME THAT IS
3 RELATED TO THIS APPLICATION DID MR. OLSON PERSONALLY
4 STALK YOU?

5 **A** IT STARTED IN JUNE OF 2017.

6 **Q** YOU OBSERVED HIM STALKING YOU?

7 **A** I WAS TOLD BY MR. AMADO MORENO.

8 **Q** SO YOU DID NOT PERSONALLY OBSERVE HIM
9 PERSONALLY STALKING YOU?

10 **A** NO.

11 **Q** WHEN IN THAT SAME TIMEFRAME DID YOU OBSERVE
12 MR. OLSON PERSONALLY SURVEILLING YOU?

13 **A** I DID NOT SEE HIM PERSONALLY SURVEILLING ME.

14 **Q** WHEN DID YOU OBSERVE HIM STEAL THE LOCKBOX
15 WITH THE KEYS TO YOUR HOME?

16 **A** I DID NOT OBSERVE HIM PERSONALLY DOING IT.

17 **Q** WHEN DID YOU OBSERVE HIM THREATEN YOUR LIFE?

18 **A** WELL, HE THREATENED MY LIFE EARLIER.

19 **Q** SO THIS ALLEGATION RELATES TO AN EARLIER
20 INCIDENT?

21 **A** NO. THROUGH THESE PEOPLE THAT -- I WAS TOLD
22 BY MR. MORENO THERE WAS A THREAT.

23 **Q** SO YOU NEVER OBSERVED MR. OLSON PERSONALLY
24 THREATEN YOUR LIFE?

25 **A** NO. I WAS JUST TOLD ABOUT IT.

26 **Q** YOU SAY ALSO --

27 **A** EXCEPT THAT --

28 **Q** THERE IS NO QUESTION PENDING.

1 **THE COURT:** LET HER FINISH THE ANSWER. EXCEPT
2 THAT?

3 **THE WITNESS:** YOU SAID THAT YOU NEVER HEARD HIM
4 THREATEN YOUR LIFE. AND I HEARD HIM THREATEN MY LIFE
5 EARLIER, AND THEN LATER MR. MORENO HAD WITNESSED THE
6 THREAT AND TOLD ME ABOUT IT. SO IT CORRELATED.

7 **BY MR. KENNEDY:**

8 **Q** ARE YOU DONE?

9 **A** (NO AUDIBLE RESPONSE.)

10 **Q** WHEN YOU TALKED ABOUT HIM THREATENING YOUR
11 LIFE EARLIER, WHAT TIME EARLIER?

12 **A** IN 2015.

13 **Q** THAT RELATES TO YOUR PREVIOUS APPLICATION;
14 CORRECT?

15 **A** CORRECT.

16 **Q** WHY IS IT IN THIS APPLICATION?

17 **A** BECAUSE MR. MORENO WITNESSED HIM WITH THE
18 MEN IN BLACK AGAIN --

19 **Q** SO?

20 **A** -- LATER.

21 **Q** DO YOUR PERSONAL OBSERVATION OF HIM
22 THREATENING IS -- TODAY IT'S ONLY WHAT MR. MORENO TOLD
23 YOU?

24 **A** RIGHT.

25 **Q** AND YOUR PERSONAL OBSERVATION IS PART OF
26 YOUR 2015 APPLICATION?

27 **A** CORRECT.

28 **Q** THAT APPLICATION WAS RESOLVED AND SETTLED;

1 CORRECT?

2 **A** MY UNDERSTANDING FROM THE COURT WAS THAT IF
3 THERE WAS A NEW VIOLATION THAT I COULD COME BACK TO
4 COURT.

5 **MR. KENNEDY:** MOVE TO STRIKE AS NONRESPONSIVE.

6 **THE COURT:** SUSTAINED. NONRESPONSIVE. THE ANSWER
7 IS STRICKEN.

8 **BY MR. KENNEDY:**

9 **Q** DID YOU SIGN A SETTLEMENT AGREEMENT IN
10 CONNECTION WITH THE 2015 APPLICATION?

11 **A** I WOULD NOT CHARACTERIZE IT AS A SETTLEMENT
12 AGREEMENT. WE HAD AN UNDERSTANDING.

13 **Q** CAN YOU TURN TO EXHIBIT O, WHICH HAS ALSO
14 BEEN STIPULATED AS ADMITTED INTO EVIDENCE.

15 LOOK AT THE SECOND PAGE OF EXHIBIT O.0002.
16 DO YOU SEE WHERE I AM?

17 **A** YES.

18 **Q** IS THAT YOUR SIGNATURE?

19 **A** YES.

20 **Q** IS THIS THE MEDIATION AGREEMENT THAT YOU
21 ENTERED INTO IN CONNECTION WITH THE 2015 APPLICATION?

22 **A** YES.

23 **Q** AND ISN'T IT TRUE THAT UNDER THIS AGREEMENT
24 WHICH -- WELL, LET'S LOOK AT THE FIRST PARAGRAPH. DO YOU
25 SEE WHERE IT STARTS, "THE UNDERSIGNED"?

26 **THE COURT:** TYPEWRITTEN LANGUAGE?

27 **MR. KENNEDY:** YES, SIR.

28 **Q** DO YOU SEE THAT?

1 **A** YEAH.

2 **Q** RIGHT UNDERNEATH THE HANDWRITTEN DATES, IT
3 SAYS, "THE UNDERSIGNED PARTIES ON THE 10TH DAY OF
4 DECEMBER, 2015, HAVE AGREED TO THE FOLLOWING SETTLEMENT
5 OF THEIR DISPUTE." DO YOU SEE THAT?

6 **A** YES.

7 **Q** AND DO YOU SEE UNDER PARAGRAPH ONE WHERE IT
8 SAYS, "RESPONDENT DENIES EACH AND EVERY ALLEGATION MADE
9 BY THE PETITIONER"? DO YOU SEE THAT?

10 **A** YES.

11 **Q** AND DO YOU SEE MAYBE A LITTLE MORE THAN
12 HALFWAY DOWN BEFORE THE SMALL PRINT THERE IS SOME
13 LANGUAGE IN THE MIDDLE OF THE PAGE THAT SAYS "CASE
14 DISMISSED WITHOUT PREJUDICE" WITH AN "X" NEXT TO IT?

15 **A** YES.

16 **Q** DO YOU SEE WHERE IT SAYS "CASE DISMISSED
17 WITHOUT PREJUDICE," IT SAYS THIS SETTLEMENT IS BINDING ON
18 THE PARTIES. DO YOU SEE THAT?

19 **A** YES.

20 **Q** AND YOU SIGNED THIS; RIGHT?

21 **A** YES.

22 **Q** LETS MOVE BACK TO THE EXHIBIT WE WERE
23 LOOKING AT BEFORE. 0003, TRIAL EXHIBIT J.

24 **THE COURT:** PAGE 0003.

25 **BY MR. KENNEDY:**

26 **Q** LOOK AT PARAGRAPH FOUR. DO YOU SEE WHERE
27 I'M AT?

28 **A** YES.

1 **Q** AND YOU SAY HERE, HE THREATENED MY LIFE,
2 QUOTE, HE WILL HURT YOU, HE HAS, QUOTE, CLUB THAT CAN
3 KILL ME BECAUSE HE'S SO WEALTHY. WHEN WAS THIS THREAT?

4 **A** IT WAS BEFORE AND IT WAS AFTER.

5 **Q** CAN YOU BE MORE SPECIFIC, PLEASE?

6 **A** WELL, PRIOR TO THE -- 2015, HE PERSONALLY
7 THREATENED ME. AND THEN THROUGH AMADO MORENO, HE ALSO
8 TOLD ME THAT -- THE SAME TYPE OF THREAT AGAIN.

9 **Q** BUT YOU DON'T REFERENCE MR. MORENO IN THIS
10 APPLICATION, DO YOU?

11 **A** NO, I DON'T.

12 **Q** CAN WE TURN TO EXHIBIT A. IT'S IN THE FRONT
13 OF YOUR BINDER.

14 **THE COURT:** THE PETITIONER'S BINDER?

15 **MR. KENNEDY:** THE BINDER SHE HAS. SORRY ABOUT
16 THAT. THIS HAS BEEN ADMITTED INTO EVIDENCE BY
17 STIPULATION?

18 **THE COURT:** YES.

19 **BY MR. KENNEDY:**

20 **Q** PLEASE LOOK AT EXHIBIT A.0003.

21 **MR. KANANI:** OBJECTION. RELEVANCE.

22 **THE COURT:** OVERRULED.

23 **BY MR. KENNEDY:**

24 **Q** DO YOU SEE PARAGRAPH FOUR ON THAT PAGE?

25 **A** YES.

26 **Q** AND JUST COMPARING THE LANGUAGE OF THESE TWO
27 APPLICATIONS, SO IN 2015 YOU SAY, HE THREATENED MY LIFE,
28 HE SAID HE HAS A CLUB THAT CAN KILL ME BECAUSE HE'S SO

1 WEALTHY. AND IN 2017 YOU SAY, HE THREATENED MY LIFE. HE
2 WILL HURT YOU. HE HAS A CLUB THAT CAN KILL ME BECAUSE
3 HE'S SO WEALTHY.

4 DO YOU SEE THAT?

5 **A** COMPARING THE TWO THAT THEY ARE SIMILAR,
6 YES.

7 **Q** ALMOST WORD FOR WORD; RIGHT?

8 **A** YES.

9 **Q** GOING BACK TO EXHIBIT J, WE'RE GOING TO LOOK
10 AT SUBSECTION B, BOTTOM OF 0003. DO YOU SEE WHERE YOU
11 REFERENCE A SEXUAL ASSAULT BATTERY?

12 **A** YES.

13 **Q** WHEN DID THAT OCCUR?

14 **A** THAT OCCURRED IN 2015.

15 **Q** THAT WAS PART OF YOUR OTHER APPLICATION;
16 CORRECT?

17 **A** CORRECT.

18 **Q** SO WHAT IS IT SPECIFICALLY THAT MR. OLSON
19 HAS DONE TO YOU DIRECTLY THAT FORMS THE BASIS OF YOUR
20 APPLICATION THAT WE'RE DEALING WITH TODAY, THAT IS NOT
21 PART OF THE 2015 BUT JUST TODAY'S, THE APPLICATION AT
22 ISSUE TODAY?

23 **A** THE --

24 **Q** I'M SORRY. LET ME MAKE IT AN EASIER
25 QUESTION. I'M NOT ASKING WHAT ANYONE HAS TOLD YOU. I'M
26 ASKING YOU WHAT YOU PERSONALLY HAVE OBSERVED.

27 **A** I HAVE OBSERVED BEING FOLLOWED.

28 **Q** BY MR. OLSON?

1 **A** NO. BY THIRD PARTIES THAT I BELIEVE WERE
2 HIRED BY HIM.

3 **Q** DID YOU SEE MR. OLSON HIRE THEM?

4 **A** NO.

5 **Q** DID YOU EVER SEE MR. OLSON TALK TO THEM?

6 **A** NO.

7 **Q** WHAT ELSE DO YOU ALLEGE MR. OLSON DID THAT
8 FORMS THE BASIS OF YOUR APPLICATION TODAY? NOT WHAT WAS
9 IN THE 2015 APPLICATION, BUT THE APPLICATION THAT WAS AT
10 ISSUE TODAY.

11 **A** WELL, THE APPLICATION FROM 2015 SAYS HE'S
12 NOT SUPPOSED TO DISPARAGE ME AND HE'S CONTINUING TO BREAK
13 THAT RULE BY DISPARAGING ME. SO HE'S NOT SUPPOSED TO
14 DISPARAGE ME AND HE'S BEEN DOING THAT.

15 **Q** CAN YOU SHOW ME IN THE 2015 APPLICATION
16 WHERE IT SAYS THAT HE'S NOT SUPPOSED TO DISPARAGE YOU?

17 **A** WHAT NUMBER -- WHAT LETTER WAS THAT?

18 **Q** THE 2015 APPLICATION IS EXHIBIT A.

19 **A** I MEAN THE SIGNED AGREEMENT.

20 **Q** TALKING ABOUT THE SETTLEMENT AGREEMENT?

21 **A** I DON'T REFER TO IT AS A SETTLEMENT
22 AGREEMENT. AN UNDERSTANDING.

23 **Q** THE MEDIATION AGREEMENT; IS THAT RIGHT?

24 **A** WE CAN CALL IT THAT.

25 **Q** I THINK THAT IS WHAT THE TITLE IS OF IT.

26 **THE COURT:** IS THAT THE DOCUMENT THAT YOU'RE
27 REFERRING TO?

28 **THE WITNESS:** YES.

1 **BY MR. KENNEDY:**

2 **Q** AND DO YOU MENTION THIS ALLEGED
3 DISPARAGEMENT IN YOUR 2017 APPLICATION?

4 **A** NO. BECAUSE IT HAPPENED AFTER I FILED IT.

5 **Q** WHEN DID IT HAPPEN?

6 **A** IT HAPPENED AT THE RECENT BOARD MEETING, THE
7 HOMEOWNER'S MEETING.

8 **Q** WHAT WAS SAID?

9 **A** HE TOLD PEOPLE AT THE PROPERTY THAT I WAS A
10 VIOLATOR. I WAS STILL VIOLATING THE RULES. SO I HAD
11 GOTTEN FINES AND I HAD NOT PAID THE FINES. I DON'T HAVE
12 ANY FINES; THEREFORE, I DID NOT PAY THE FINES. AND HE
13 SAID I WAS STILL BRINGING MANY STRANGE PEOPLE ONTO THE
14 PROPERTY. AND BASICALLY DISPARAGING ME IN FRONT OF
15 EVERYBODY.

16 **Q** AND YOU SUED MR. OLSON FOR DEFAMATION,
17 HAVEN'T YOU?

18 **MR. KANANI:** OBJECTION. RELEVANCE.

19 **THE COURT:** OVERRULED.

20 **THE WITNESS:** YES.

21 **BY MR. KENNEDY:**

22 **Q** SO YOU'RE DEALING WITH THAT IN THE CIVIL
23 CASE; CORRECT?

24 **A** YES.

25 **Q** AND IT'S NOT PART OF YOUR APPLICATION IN
26 THIS CASE, IT'S PART OF YOUR CIVIL DISPUTE?

27 **A** THAT IS SOMETHING THAT RECENTLY HAPPENED.
28 THE DISPARAGEMENT IS NOT ABOUT DEFAMATION, BUT ABOUT THE

1 FACT THAT WE'RE NOT SUPPOSED TO CROSS UP OR TRY TO
2 ESCALATE OR -- YOU KNOW, IT'S SUPPOSED TO DIFFUSE THINGS.

3 Q AND THIS COMMENT THAT HE ALLEGED ABOUT YOU,
4 THIS NOW FORMS THE BASIS OF A CIVIL HARASSMENT KIND OF
5 CASE?

6 A NO. MY UNDERSTANDING OF THE QUESTION WAS
7 WHAT WERE ALL OF THE THINGS. SO THE SURVEILLING, THE
8 STALKING ME, THAT IS ONE PART OF IT. AND THIS JUST
9 RECENTLY HAPPENED, LIKE LAST MONTH.

10 Q WELL, LET ME CLARIFY BECAUSE WE MAY BE
11 TALKING PAST EACH OTHER. I APOLOGIZE IF I'VE BEEN
12 CONFUSING IN MY QUESTIONS.

13 MY QUESTION ULTIMATELY WAS, IF WE GO BACK A
14 COUPLE OF STEPS, WHAT IS IT THAT YOU PERSONALLY OBSERVED
15 MR. OLSON DO TO YOU THAT FORMS THE BASIS OF YOUR
16 HARASSMENT APPLICATION, CIVIL HARASSMENT APPLICATION
17 BEFORE THE COURT TODAY?

18 A HAVING ME STALKED BY THESE MEN IN BLACK AND
19 FOLLOWED.

20 Q BUT YOU -- I THINK YOU TESTIFIED THAT YOU
21 DID NOT PERSONALLY OBSERVE MR. OLSON WITH THESE MEN,
22 TALKING TO THESE MEN. YOU HAVE NO PERSONAL CONNECTION OF
23 THE OLSON AND THE MEN IN BLACK.

24 A CORRECT.

25 **MR. KENNEDY:** NO FURTHER QUESTIONS, YOUR HONOR.

26 **THE COURT:** REDIRECT.

27 **MR. KANANI:** BRIEFLY.

28 ///

REDIRECT EXAMINATION

1
2 **BY MR. KANANI:**

3 **Q** WHEN YOU FILED YOUR ORIGINAL APPLICATION FOR
4 A RESTRAINING ORDER ON THIS MATTER, MS. ██████████, WERE
5 YOU REPRESENTED BY AN ATTORNEY?

6 **A** NO.

7 **Q** DID YOU FULLY UNDERSTAND THE QUESTIONS THAT
8 WERE BEING ASKED AND THE INFORMATION THAT YOU NEEDED TO
9 PROVIDE IN YOUR APPLICATION FOR A RESTRAINING ORDER IN
10 THIS MATTER?

11 **MR. KENNEDY:** OBJECTION. RELEVANCE.

12 **THE COURT:** SUSTAINED.

13 **BY MR. KANANI:**

14 **Q** DID YOU HIRE AN ATTORNEY PARTWAY THROUGH THE
15 PROCEEDINGS IN THIS MATTER?

16 **MR. KENNEDY:** OBJECTION. RELEVANCE.

17 **THE COURT:** OVERRULED.

18 **THE WITNESS:** YES.

19 **BY MR. KANANI:**

20 **Q** WHY DID YOU HIRE AN ATTORNEY AFTER YOU HAD
21 ALREADY FILED THE APPLICATION ON YOUR OWN?

22 **A** I DID NOT UNDERSTAND WHAT I WAS -- I DID NOT
23 UNDERSTAND A LOT OF THE WAY THE LAW WORKS OR HOW YOU'RE
24 SUPPOSED TO DO THESE THINGS.

25 **Q** IF YOU COULD IN THE SAME BINDER, TURN TO
26 EXHIBIT FF.

27 **THE COURT:** ALREADY ADMITTED INTO EVIDENCE.

28 ///

1 **BY MR. KANANI:**

2 **Q** DOES THIS DOCUMENT --

3 **A** I JUST REMEMBERED SOMETHING THAT I FORGOT
4 THAT I THINK I NEED TO SAY TO CORRECT THE RECORD.

5 **THE COURT:** GO AHEAD.

6 **THE WITNESS:** CURT OLSON'S ATTORNEY DIEN LE CALLED
7 ME IN MARCH OF 2017 AND TOLD ME THAT IF I DID NOT DISMISS
8 THE LAWSUIT THAT MR. OLSON WOULD HURT ME AND RUN ME OVER
9 WITH A CAR WHEN I WAS OUT WALKING MY DOG. AND I WAS VERY
10 SHOCKED ABOUT IT AND I MADE A POLICE REPORT.

11 **THE COURT:** IS THAT IT? IS THAT WHAT YOU WANTED TO
12 ADD TO THE RECORD?

13 **THE WITNESS:** YES.

14 **THE COURT:** MR. KENNEDY, DO YOU WANT TO REOPEN YOUR
15 QUESTIONS ON CROSS?

16 **MR. KENNEDY:** I'D LIKE TO RESERVE THE RIGHT TO CALL
17 MR. LE TO REBUT THE WITNESS' TESTIMONY.

18 **THE COURT:** YOU HAVE A RIGHT TO RE-QUESTION THE
19 WITNESS IF YOU WISH TO NOW ON CROSS.

20 **MR. KENNEDY:** SURE.

21 **THE COURT:** AND YOU CAN CALL WHOEVER YOU WANT AS
22 IMPEACHMENT OR REBUTTAL. BUT BECAUSE NEW EVIDENCE WAS
23 ADDED AFTER YOU FINISHED YOUR QUESTIONS, I'M GIVING YOU
24 THE OPPORTUNITY TO REOPEN YOUR QUESTIONS TO FINISH THEM,
25 AND THEN WE'LL GO BACK TO WHERE WE WERE WITH MR. KANANI.

26 **MR. KENNEDY:** I APPRECIATE THAT, YOUR HONOR. THANK
27 YOU.

28 ///

CROSS-EXAMINATION (RESUMED)

1
2 **BY MR. KENNEDY:**

3 **Q** WHEN DID THIS HAPPEN, MS. [REDACTED] ?

4 **A** I WROTE AN E-MAIL TO MR. LE. SO THE EXACT
5 DAY IS ON THE E-MAIL. RIGHT AFTER IT HAPPENED, I WROTE
6 DOWN THE WHOLE E-MAIL. AND THEN THE NEXT TIME I SAW
7 MR. LE IN COURT, I TALKED TO HIM ABOUT IT AND I ASKED HIM
8 FOR AN APOLOGY. AND I THOUGHT HE SHOULD MAYBE REMOVE
9 HIMSELF FROM THE CASE.

10 **Q** ARE YOU TESTIFYING TODAY THAT IN AN E-MAIL
11 THAT WAS SENT TO YOU MR. LE, A LICENSED ATTORNEY IN
12 CALIFORNIA, TOLD YOU THAT MR. OLSON WAS GOING TO RUN YOU
13 OVER WITH A CAR?

14 **MR. KANANI:** OBJECTION. MISSTATES THE FACTS.

15 **THE COURT:** OVERRULED.

16 **THE WITNESS:** NO. IT WAS A PHONE CONVERSATION. I
17 WAS REPRESENTING MYSELF. AND WHAT HAPPENED IS THAT HE
18 WANTED ME TO DISMISS THE CASE. MR. OLSON WANTED ME TO
19 DISMISS THE CASE. AND I TOLD HIM I WAS AFRAID TO DISMISS
20 THE CASE BECAUSE IT WAS KIND OF LIKE LIFE INSURANCE. IF
21 I DISMISS THE CASE, THEN I WOULD BE WIDE OPEN TO BE
22 MURDERED, KILLED, OR DISAPPEAR OR SOMETHING AND BECAUSE
23 THEN I WOULDN'T BE ABLE TO REFILE IT IF I WAS GONE.

24 AND HE SAID -- AND I SAID, YOU KNOW, LIKE,
25 YOU KNOW, I'M AFRAID LIKE WHEN I'M WALKING MY DOG THAT
26 I'M GOING TO GET RUN OVER OR SOMETHING. AND HE SAID,
27 WELL, IF YOU'RE REALLY AFRAID OF GETTING HURT, THEN
28 YOU'RE MORE LIKELY TO GET HURT IF YOU DON'T DISMISS THE

1 CASE. SO IN THE CONTEXT OF ME TALKING ABOUT GETTING RUN
2 OVER BY A CAR, HE WAS SAYING THAT YOU'RE GOING TO GET
3 HURT LIKE THIS IF YOU DON'T DISMISS THIS CASE. AND SO --

4 **THE COURT:** WHEN YOU SAY DISMISS THIS CASE, ARE YOU
5 TALKING ABOUT THE SEPARATE CIVIL ACTION OR ACTIONS THAT
6 ARE PENDING?

7 **THE WITNESS:** NO. THE SEPARATE CIVIL ACTION THAT I
8 FILED.

9 **THE COURT:** THANK YOU.

10 **BY MR. KENNEDY:**

11 **Q** AND SO MR. LE IS NOW PART OF THE GROUP OF
12 INDIVIDUALS WHO MR. OLSON HAS ALLEGEDLY HIRED TO STALK
13 YOU, HARASS YOU, THREATEN YOU; IS THAT RIGHT?

14 **A** WELL, I DON'T THINK THAT MR. LE IS GOING TO
15 TRY TO HURT ME OR DO ANYTHING. HE WAS JUST RELAYING THIS
16 SENTIMENT AND THE PRESSURE AND TELLING ME THE
17 CONSEQUENCES TO ME IF I DIDN'T DISMISS THE CASE.

18 **Q** THAT WAS NOT MY QUESTION.

19 **A** I DON'T UNDERSTAND THE QUESTION.

20 **Q** MY QUESTION IS IS MR. LE NOW INCLUDED WITHIN
21 THE GROUP OF INDIVIDUALS THAT YOU HAVE ALLEGED WERE HIRED
22 BY MR. OLSON TO HARASS YOU?

23 **A** DO YOU MEAN IS HE NAMED IN THE LAWSUIT?

24 **Q** I'M ASKING IF YOU ARE INCLUDING HIM IN THE
25 LIST OF INDIVIDUALS THAT YOU PREVIOUSLY TESTIFIED TO WERE
26 HIRED BY MR. OLSON TO HARASS YOU?

27 **A** AM I INCLUDING HIM -- I GUESS SO, YOU KNOW.

28 **Q** AND YOU SEE MR. LE IN THE COURTROOM TODAY?

1 **A** YES.

2 **MR. KENNEDY:** NO FURTHER QUESTIONS.

3 **THE COURT:** BACK TO THE REDIRECT AND YOU CAN
4 INCLUDE THESE ADDITIONAL CROSS QUESTIONS AND ANSWERS AS
5 PART OF YOUR ONGOING REDIRECT.

6

7 **REDIRECT EXAMINATION (RESUMED)**

8 **BY MR. KANANI:**

9 **Q** GOING BACK TO WHAT I BELIEVE IS EXHIBIT FF,
10 RESPONDENT'S EXHIBIT FF.

11 **THE COURT:** YES.

12 **BY MR. KANANI:**

13 **Q** DO YOU RECOGNIZE THIS DOCUMENT,
14 MS. ██████████?

15 **A** CAN I TAKE A MOMENT TO READ IT?

16 **Q** YES. PLEASE DO.

17

18 (PAUSE IN THE PROCEEDINGS.)

19

20 **THE WITNESS:** DO YOU WANT ME TO READ ALL OF THE
21 PAGES.

22 **BY MR. KANANI:**

23 **Q** JUST ENOUGH TO REFRESH YOUR RECOLLECTION.
24 YOU DON'T HAVE TO READ EVERYTHING. IT SHOULD BE A
25 DOCUMENT TITLED "SUPPLEMENTAL DECLARATION OF ██████████
26 ██████████."

27 **A** SUPPLEMENTAL -- I'M ON THE WRONG PAGE.

28 **THE COURT:** FF IS A LETTER DATED SEPTEMBER 16.

1 **MR. KENNEDY:** I BELIEVE IT'S IN THE SECOND BINDER.

2 **THE WITNESS:** IT'S NOT IN THIS BINDER.

3 **THE COURT:** CAN YOU APPROACH AND PRESENT THE SECOND
4 BINDER. MY MISTAKE. MY MISTAKEN ENTIRELY. I WAS TURNED
5 TO THE WRONG EXHIBIT AS WELL.

6 FF. SECOND BINDER.

7 **THE WITNESS:** CAN I CLOSE THIS?

8 **THE COURT:** YOU WANT TO PUT IT UP ON THE LEDGE, YOU
9 MAY.

10 **MR. KANANI:** MAY I APPROACH, YOUR HONOR?

11 **THE COURT:** YES.

12 **THE WITNESS:** OKAY.

13 **BY MR. KANANI:**

14 **Q** DO YOU RECOGNIZE THIS DOCUMENT,
15 MS. ████████?

16 **A** YES, I DO.

17 **Q** IS THIS A SUPPLEMENTAL DECLARATION THAT YOU
18 FILED IN THIS MATTER?

19 **A** YES, IT IS.

20 **Q** WERE YOU ORDERED BY A COURT TO FILE THIS
21 DECLARATION?

22 **A** I BELIEVE SO. I'M NOT SURE.

23 **Q** AND YOU BELIEVE EVERYTHING IN HERE IS
24 ACCURATE AS YOU RECALL IT?

25 **A** YES.

26 **Q** IS THAT YOUR SIGNATURE ON THE LAST PAGE?

27 **A** YES.

28 **MR. KANANI:** I CAN'T REMEMBER, YOUR HONOR, IF FF

1 HAS BEEN ADMITTED INTO EVIDENCE.

2 **THE COURT:** IT HAS BEEN ADMITTED.

3 **MR. KENNEDY:** IT'S NOT ON OUR STIPULATION.

4 **THE COURT:** I'M SORRY. DOUBLE MISTAKE ON THIS ONE.
5 NOT YET IN EVIDENCE.

6 **MR. KANANI:** PETITIONER MOVES -- REQUEST TO MOVE
7 RESPONDENT'S EXHIBIT FF, SUPPLEMENTAL DECLARATION, INTO
8 EVIDENCE.

9 **THE COURT:** ANY OBJECTION?

10 **MR. KENNEDY:** YES, YOUR HONOR. CONTAINS HEARSAY.
11 CUMULATIVE OF THE TESTIMONY THAT SHE'S HERE TO PROVIDE.

12 **THE COURT:** OVERRULED. FF ADMITTED INTO EVIDENCE.

13
14 (EXHIBIT FF WAS RECEIVED INTO EVIDENCE.)

15
16 **BY MR. KANANI:**

17 **Q** MS. [REDACTED], DO YOU BELIEVE THAT MR. LE IS
18 A LICENSED ATTORNEY WITH THE STATE OF CALIFORNIA?

19 **A** HE SAYS HE IS. I BELIEVE SO.

20 **Q** DO YOU BELIEVE THAT MR. LE WAS HIRED BY
21 MR. OLSON SPECIFICALLY TO HARASS OR THREATEN YOU?

22 **A** YES.

23 **MR. KANANI:** NO FURTHER QUESTIONS, YOUR HONOR.

24 **THE COURT:** RE CROSS.

25 **MR. KENNEDY:** YES, YOUR HONOR. THANK YOU. JUST
26 BRIEFLY.

27
28 ///

REXCROSS-EXAMINATION

1
2 **BY MR. KENNEDY:**

3 **Q** PLEASE TURN TO EXHIBIT J, MS. OLSON.

4 **MR. KANANI:** I BELIEVE MR. KENNEDY REFERRED TO THE
5 WITNESS AS MS. OLSON.

6 **MR. KENNEDY:** SORRY. MS. [REDACTED].

7 **THE COURT:** MS. [REDACTED], TURN TO EXHIBIT J.

8 **THE WITNESS:** I DON'T THINK -- OH, THIS BINDER.

9 **BY MR. KENNEDY:**

10 **Q** JUST REFRESH MY RECOLLECTION, MS. [REDACTED].
11 WHAT DID YOU SAY AGAIN HAPPENED ON SEPTEMBER 2 THAT
12 FORMED THE BASIS OF THE 2017 APPLICATION?

13 **MR. KANANI:** OBJECTION. ASKED AND ANSWERED.

14 **THE COURT:** OVERRULED.

15 **THE WITNESS:** THAT IS WHERE THERE WAS THESE THIRD
16 PARTY SURVEILLERS.

17 **BY MR. KENNEDY:**

18 **Q** WHO WAS IT THAT TOLD YOU THAT HAPPENED?

19 **A** I GOT A PHONE CALL FROM A NEIGHBOR WHO TOLD
20 ME TO GO OUTSIDE, THERE WAS A GUY WALKING AROUND THE
21 BACKSIDE OF MY PROPERTY. AND THEN TITUS WAS WITH ME, AND
22 WE WENT TO THE BACK AND THE PERSON RAN AND GOT INTO A CAR
23 AND RAN AWAY.

24 **Q** I'M CONFUSED. I THOUGHT YOU TESTIFIED,
25 CORRECT ME IF I'M WRONG, THAT MR. MORENO TOLD YOU THERE
26 WAS SOMEBODY SURVEILLING.

27 **A** HE SAW THEM, TOO. THERE WAS MULTIPLE PEOPLE
28 CALLING ME, CONSTANTLY TELLING ME -- SOME OF MY FRIENDS

1 IN THE NEIGHBORHOOD, THEY FOUND OUT ABOUT THIS BECAUSE
2 THEY SAW THIS GOING ON. AND SO PEOPLE WERE ON ALERT AND
3 THEY WERE CALLING ME WHEN THEY WOULD SEE PEOPLE
4 SPECIFICALLY WITH CAMERAS OR VIDEOTAPES OR UNUSUALLY
5 SITTING IN PARKED CARS OUTSIDE WHERE THEY COULD SEE MY
6 BACK DOOR OR WHERE THEY COULD FOLLOW ME WHEREVER I WAS
7 GOING.

8 **MR. KENNEDY:** NO FURTHER QUESTIONS, YOUR HONOR.

9 **THE COURT:** ALL RIGHT. YOU MAY STEP DOWN. RETURN
10 TO THE TABLE NEXT TO YOUR ATTORNEY. LEAVE ALL THE BOOKS
11 THERE. WE'LL TAKE CARE OF IT.

12 NEXT WITNESS ON THE [REDACTED] CASE-IN-CHIEF.

13 **MR. KANANI:** NO FURTHER WITNESSES IN THE
14 CASE-IN-CHIEF, THOUGH WE RESERVE THE RIGHT TO CALL ONE,
15 POTENTIALLY MOST LIKELY TWO VERY SHORT REBUTTAL
16 WITNESSES.

17 **THE COURT:** THAT IS NOT HAPPENING YET. THIS IS
18 YOUR CASE-IN-CHIEF. DO YOU REST?

19 **MR. KANANI:** YES.

20 **THE COURT:** BEFORE YOU FORMALLY REST, ARE ALL OF
21 YOUR EXHIBITS IN EVIDENCE THAT YOU WANT IN EVIDENCE OR
22 ARE THERE ADDITIONAL EXHIBITS THAT YOU WANT IN EVIDENCE?

23 **MR. KANANI:** PETITIONER MOVES TO ADMIT PETITIONER'S
24 EXHIBIT 10 -- SHOULD I STATE THEM ALL?

25 **THE COURT:** HOLD ON. TELL US WHEN YOU'RE THERE.

26 EXHIBIT 10, ANY OBJECTIONS?

27 **MR. KENNEDY:** THIS HAS BEEN REJECTED FOR HEARSAY,
28 YOUR HONOR.

1 **THE COURT:** IT WAS OFFERED, AND I SUSTAINED THE
2 OBJECTIONS. AND DO YOU HAVE FURTHER OBJECTIONS?

3 **MR. KENNEDY:** STAND ON THE OBJECTIONS PREVIOUSLY
4 MADE.

5 **THE COURT:** WHICH WERE?

6 **MR. KENNEDY:** HEARSAY. LACKS FOUNDATION. FAILURE
7 TO AUTHENTICATE.

8 **THE COURT:** SUSTAINED. EXHIBIT 10 WILL NOT BE
9 ADMITTED. THERE WAS TESTIMONY ABOUT IT.

10 **MR. KANANI:** I APOLOGIZE.

11 **THE COURT:** NO NEED TO APOLOGIZE. MR. FOTSO
12 REPORTED THE INCIDENT TO THE POLICE. THE POLICE TOOK A
13 CARD AS THEY OFTEN DO. THE PROBLEM WITH THIS EXHIBIT IS
14 THAT IT CONTAINS THE HEARSAY STATEMENT OF THE OFFICER WHO
15 IS NOT HERE TO TESTIFY. SO MR. FOTSO TESTIFIED TO HIS
16 PERSONAL KNOWLEDGE AND THAT HE REPORTED IT. THAT IS
17 ENOUGH. SO EXHIBIT 10 IS NOT ADMITTED. OBJECTION OF
18 RESPONDENT SUSTAINED.

19 NEXT.

20 **MR. KANANI:** WE WOULD ASK THAT EXHIBIT --
21 EXHIBIT 27 HAS ALREADY BEEN ADMITTED, SO WE'RE NOT --

22 **THE COURT:** YES.

23 **MR. KANANI:** AND WE WOULD ASK THAT EXHIBIT 26 BE
24 ADMITTED INTO EVIDENCE, PETITIONER'S EXHIBIT 26.

25 **THE COURT:** NOTES AND PHOTOGRAPHS, IS THAT THE ONE?

26 **MR. KANANI:** YES, YOUR HONOR. VARIOUS NOTES AND
27 PHOTOGRAPHS.

28 **THE COURT:** ANY OBJECTION?

1 **MR. KENNEDY:** YOUR HONOR, THERE WAS NO WITNESS THAT
2 WAS EVER QUESTIONED ABOUT THIS EXHIBIT. IT HAS NO
3 FOUNDATION OR AUTHENTICITY.

4 **THE COURT:** DO YOU WISH TO ARGUE, MR. KANANI?

5 **MR. KANANI:** MY CLIENT CAN AUTHENTICATE OR ATTEMPT
6 TO AUTHENTICATE AS MUCH AS POSSIBLE.

7 **THE COURT:** SHE'S ALREADY TAKEN THE STAND.

8 **MR. KANANI:** NOTHING FURTHER, YOUR HONOR.

9 **THE COURT:** SUSTAIN THE OBJECTION. EXHIBIT 26 WILL
10 NOT BE ADMITTED.

11 **MR. KANANI:** NO FURTHER REQUESTS. I BELIEVE ALL
12 OTHER EXHIBITS HAVE BEEN ADDRESSED BY THE COURT.

13 **THE COURT:** DO YOU FORMALLY REST YOUR
14 CASE-IN-CHIEF?

15 **MR. KANANI:** WE DO.

16 **THE COURT:** YOU'LL HAVE A RIGHT TO PRESENT REBUTTAL
17 AFTER THE RESPONDENT. AND THEN AFTER THE [REDACTED]
18 REBUTTAL CASE, THEN THE OLSON RIGHT OF REBUTTAL THEN
19 ARISES BECAUSE WE'VE HEARD SOME PARTS OF THE OLSON
20 CASE-IN-CHIEF. NOW WE'LL HEAR THE REST OF THE OLSON
21 CASE-IN-CHIEF.

22 CALL YOUR FIRST WITNESS OR NEXT WITNESS, I
23 SHOULD SAY.

24 **MR. KENNEDY:** CALL MR. OLSON.

25 **THE COURT:** IF YOU COME BACK TO THE WITNESS STAND,
26 MR. OLSON.

27 ABOUT 15 MINUTES AND THEN BREAK FOR LUNCH.
28 HOW LONG DO YOU ANTICIPATE THIS EXAMINATION WILL BE?

1 **MR. KENNEDY:** YOUR HONOR, WE PREVIOUSLY ESTIMATED,
2 I BELIEVE, THE TIME IS AN HOUR, HOUR AND A HALF.

3 **THE COURT:** ABOUT FIFTEEN MINUTES AND THEN WE BREAK
4 FOR LUNCH. AND WE WON'T RESUME UNTIL 2:00.

5
6 **CURTIS OLSON,**

7 RE-CALLED AS A WITNESS ON HIS OWN BEHALF,
8 HAVING BEEN PREVIOUSLY SWORN, FURTHER TESTIFIED
9 AS FOLLOWS:

10
11 **THE COURT:** YOU ARE STILL SWORN AND UNDER OATH. IF
12 YOU TAKE THE WITNESS STAND AND RESTATE YOUR NAME.

13 **THE WITNESS:** CURTIS OLSON, C-U-R-T-I-S O-L-S-O-N.

14 **THE COURT:** THANK YOU.

15 MR. KENNEDY, DIRECT.

16
17 **DIRECT EXAMINATION**

18 **BY MR. KENNEDY:**

19 **Q** MR. OLSON, WOULD YOU PLEASE TURN TO
20 EXHIBIT H IN THE BINDER IN FRONT OF YOU.

21 **A** OKAY.

22 **MR. KENNEDY:** FOR THE RECORD, YOUR HONOR, THIS
23 EXHIBIT HAS BEEN ADMITTED INTO EVIDENCE BY STIPULATION.

24 **THE COURT:** GO AHEAD.

25 **BY MR. KENNEDY:**

26 **Q** MR. OLSON, PLEASE TURN TO PAGE 0006 OF THAT
27 EXHIBIT. DO YOU HAVE THAT IN FRONT OF YOU?

28 **A** YES, SIR.

1 **Q** IS THAT YOUR SIGNATURE?

2 **A** YES, IT IS.

3 **Q** IS THIS THE RESTRAINING ORDER APPLICATION
4 THAT YOU FILED IN THIS CASE?

5 **A** YES.

6 **Q** TURN TO THE SECOND PAGE, 0002. LOOKING AT
7 PARAGRAPH SEVEN TOWARDS THE BOTTOM, DO YOU SEE WHERE I'M
8 AT?

9 **A** YES.

10 **Q** SUBSECTION A-1 WHERE IT SAYS, WHEN DID IT
11 HAPPEN? SEPTEMBER 10, 2017. DO YOU SEE THAT?

12 **A** YES.

13 **Q** WHAT HAPPENED ON SEPTEMBER 10, 2017,
14 MR. OLSON?

15 **A** THAT WAS THE DAY I WENT TO HAVE DINNER WITH
16 MY FRIEND DOUG ECONN, AND I NEEDED TO TAKE A SHOWER. SO
17 MY UNIT, I DID NOT HAVE MY KEYS. FORGOT MY KEYS BECAUSE
18 I HAD NOT BEEN USING THE UNIT FOR A LONG TIME ANYWAY. SO
19 I WENT TO HIS HOUSE TO TAKE A SHOWER. AND ON MY WAY IN
20 TO DO THAT, I NOTICED THREE PEOPLE IN THE COURTYARD.
21 MS. ██████████ WAS ONE OF THEM AND THEN THE TALL GENTLEMAN
22 THAT WAS HERE, FOTSO, OR I'M NOT SURE HIS CORRECT NAME.
23 AND THEN A THIRD INDIVIDUAL THAT I HAD NOT SEEN BEFORE.
24 SO I NOTICED THEM THERE.

25 AND I WENT IN AND WENT TO TAKE A SHOWER, AND
26 I REALIZED I FORGOT SOMETHING. I WENT WALKING BACK OUT
27 TO MY CAR, CAME BACK THROUGH. WHEN I CAME BACK THROUGH,
28 THE OTHER GENTLEMAN -- GOING TO GET THE NAME WRONG, BUT

1 FOTSO, NOT HIM, THE OTHER GENTLEMAN.

2 **MR. KANANI:** OBJECTION. NARRATIVE.

3 **THE COURT:** SUSTAINED.

4 **BY MR. KENNEDY:**

5 **Q** WHEN YOU CAME BACK FROM YOUR CAR, WHAT
6 HAPPENED NEXT?

7 **A** I'M SORRY?

8 **Q** WHEN YOU CAME BACK FROM GETTING SOMETHING
9 FROM YOUR CAR, WHAT HAPPENED NEXT?

10 **A** THE OTHER FELLOW CAME WALKING UP AND GAVE ME
11 PAPERS.

12 **MR. KANANI:** SAME OBJECTION.

13 **THE COURT:** OVERRULED. GO AHEAD.

14 **THE WITNESS:** AND SAID HE WAS SERVING ME PAPERS.
15 SO I TOOK THE PAPERS, AND I WENT INSIDE DOUG'S
16 CONDOMINIUM.

17 **BY MR. KENNEDY:**

18 **Q** WHAT HAPPENED NEXT?

19 **A** WE WERE IN THERE FOR A LITTLE BIT. I GOT
20 READY. AND DOUG HAD -- THERE WAS A KNOCK ON HIS DOOR.
21 AND HE SAID, JUST STAY BACK. I TOLD DOUG WHAT HAD
22 HAPPENED IN THE COURTYARD.

23 **Q** AT THE TIME THAT YOU HAD THE DISCUSSION WITH
24 MR. ECONN, HOW WERE YOU FEELING?

25 **THE COURT:** HOW WERE YOU FEELING?

26 **THE WITNESS:** I WAS VERY NERVOUS. NOT -- I'M NOT A
27 BIG MAN. THERE WERE TWO BIG MEN OUT THERE, AND I KNOW
28 IT'S A TENSE SITUATION ALREADY. AND I WAS VERY, VERY

1 NERVOUS.

2 **BY MR. KENNEDY:**

3 Q WERE YOU AFRAID FOR YOUR SAFETY?

4 A YES, I WAS.

5 Q DID YOU FEEL THREATENED?

6 A 100 PERCENT FELT THREATENED.

7 Q WERE YOU ABLE TO OBSERVE WHETHER

8 MS. ██████████ WAS IN THE COURTYARD WITH THESE INDIVIDUALS?

9 A SHE WAS.

10 Q DID SHE DO ANYTHING DURING THIS FIRST

11 INTERACTION YOU HAD?

12 A I DID NOT NOTICE MUCH.

13 Q WHAT HAPPENED NEXT?

14 A SO THE FELLOW CAME TO THE DOOR. DOUG TOLD

15 HIM THAT HE COULDN'T COME IN. HE WANTED TO COME IN AND

16 DOUG SAID, YOU CAN'T COME IN, AND CLOSED THE DOOR ON HIM.

17 AND SO, I DON'T KNOW, TEN MINUTES LATER, FIFTEEN, WE WERE

18 READY TO LEAVE. SO WE WENT TO LEAVE. I THOUGHT I'M

19 GOING TO TURN MY PHONE ON. I DID NOT WANT TO HOLD IT UP.

20 I PROBABLY SHOULD HAVE, WORKS AS A BETTER DEFENSE.

21 **THE COURT:** JUST TELL ME WHAT HAPPENED, PLEASE.

22 **THE WITNESS:** AND SO WE WENT WALKING OUT. AND

23 WALKING PAST THEM, THEN THEY STARTED MOVING TOWARDS US.

24 THE OTHER FELLOW CAME UP AND STARTED PUTTING PAPER AT ME

25 AGAIN. AND I ASKED HIM FOR HIS I.D. I SAID, I DON'T

26 KNOW WHO YOU ARE, GIVE ME YOUR I.D. LET ME HAVE YOUR

27 I.D. I SAID IT A COUPLE OF TIMES. AND HE -- THEN HE DID

28 NOT WANT TO DO THAT.

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1 AND SO DOUG AND I WERE ABLE TO WALK UP TO
2 THE NEXT DOOR THAT GOES INTO A HALLWAY AND EXITS OUT
3 TOWARDS THE BACK, TOWARDS THE GARAGE. AND I THOUGHT THAT
4 WAS IT. I THOUGHT IT WAS OVER WITH. THE GUY ENDED UP
5 FOLLOWING US OUT THERE.

6 **MR. KANANI:** OBJECTION. NARRATIVE. BEYOND THE
7 SCOPE.

8 **THE COURT:** SUSTAINED AS TO NARRATIVE. NOT BEYOND
9 THE SCOPE. ASK THE NEXT QUESTION. STAY TO THE QUESTION.

10 **BY MR. KENNEDY:**

11 **Q** WHAT HAPPENED NEXT?

12 **A** AFTER THAT THEY FOLLOWED US OUT. AND I DID
13 NOT REALIZE IT. I TURNED AROUND, THE MAN IS THERE. SO I
14 JUST HOPPED IN THE CAR QUICK. AND WITH THAT, HE STARTED
15 SLAMMING THE PAPER UP AGAINST THE WINDOW. AND DOUG HAD
16 GONE AROUND THE OTHER SIDE AND GOTTEN IN -- I'M SORRY.
17 HE GOT IN ON THE SAME SIDE. I WAS IN THE BACKSEAT, DOUG
18 GOT IN THE PASSENGER SEAT ON THE FRONT SEAT.

19 **Q** WERE YOU ABLE TO OBSERVE MS. [REDACTED] AT
20 THIS SECOND INCIDENT?

21 **A** FIRST, PRIOR TO WALKING OUT OF THE HALLWAY
22 DOOR, SHE'S BACK IN THERE POINTING, TELLING THIS GUY TO
23 DO SOMETHING, I DON'T KNOW WHAT. BUT I GET UP THERE, I
24 GO UP -- I'M NOT SURE.

25 **Q** DID YOU OBSERVE HIM FOLLOWING HER
26 INSTRUCTIONS?

27 **A** YES. HE WASN'T SURE WHAT HE WAS SUPPOSED TO
28 DO. HE JUST WAS LIKE A PAWN BEING TOLD WHAT TO DO.

1 **THE COURT:** JUST -- MR. OLSON, I KNOW YOU HAVE A
2 LOT TO SAY, AND I KNOW YOU HAVE A PERSONAL FEELING ABOUT
3 THIS. BUT YOUR EDITORIAL COMMENT IS NOT EVIDENCE, AND I
4 STRIKE IT. I DON'T CONSIDER IT. AND IT ADVERSELY
5 AFFECTS YOUR CREDIBILITY. THAT IS WHY I'M GETTING YOU TO
6 JUST TELL US THE FACTS. MR. KENNEDY, YOUR ATTORNEY, WILL
7 ARGUE WHAT THE FACTS MEAN. THAT IS ARGUMENT. IT DOES
8 NOT HELP YOUR CASE WHEN YOU ARGUE IN RESPONSE TO THE
9 QUESTION. JUST GIVE US THE FACTS.

10 **THE WITNESS:** OKAY.

11 **THE COURT:** WHAT HAPPENED NEXT. WHAT HAPPENED
12 NEXT. THAT IS THE QUESTIONS YOUR ATTORNEY IS ASKING YOU.
13 STICK TO THAT, PLEASE.

14 **BY MR. KENNEDY:**

15 **Q** HOW DID YOU FEEL DURING THE SECOND
16 ALTERCATION?

17 **A** AGAIN, THE SAME THING. I WAS SCARED AND
18 NERVOUS, AND SO I WANTED TO GET IN THE CAR. I WANTED TO
19 GET AWAY. AND --

20 **MR. KANANI:** OBJECTION. NARRATIVE.

21 **THE COURT:** OVERRULED. GO AHEAD.

22 **MR. KENNEDY:** I'VE HAD SO MANY PROBLEMS WITH
23 MS. ██████████ AND HER PEOPLE THAT I JUST WANTED TO GET
24 AWAY. I DID NOT WANT ONE MORE PROBLEM.

25 **BY MR. KENNEDY:**

26 **Q** AS A RESULT OF THIS INCIDENT, HAVE YOU
27 CHANGED THE WAY THAT YOU HAVE USED THE PROPERTY THAT YOU
28 OWN AT THE ██████████

1 **THE COURT:** I'LL INTERPOSE THE COURT'S OWN
2 OBJECTION. IN CASES INVOLVING ALLEGED VIOLENCE OR
3 RESTRAINING ORDERS, YOU DON'T USUALLY INQUIRE ABOUT
4 PEOPLE'S WHEREABOUTS FOR THEIR OWN PERSONAL SAFETY.
5 ANYTHING LIKE THAT MIGHT GIVE AWAY HIS OWN SAFETY PLAN
6 THAT HE MIGHT NOT WANT ANYONE ELSE, INCLUDING ME, TO
7 KNOW. WE USUALLY DON'T ALLOW THOSE QUESTIONS. SAME AS
8 LIKE ADDRESS WHERE YOU LIVE, WHERE YOU GO, I THINK IT'S
9 PART OF THE TEMPORARY RESTRAINING ORDER AS WELL.

10 SO MOVE ON TO SOMETHING ELSE.

11 **MR. KENNEDY:** THANK YOU, YOUR HONOR.

12 **Q** IS SOMEONE LIVING IN YOUR UNIT AT THE
13 ████████████████████ CURRENTLY?

14 **MR. KANANI:** OBJECTION. RELEVANCE.

15 **THE COURT:** OVERRULED.

16 **THE WITNESS:** NO.

17 **BY MR. KENNEDY:**

18 **Q** HAVE YOU PREVIOUSLY RENTED YOUR UNIT OUT?

19 **A** YES.

20 **Q** WHO DID YOU RENT IT TO?

21 **A** TOM AND MAGGIE ARGUE.

22 **Q** DO YOU RECALL HOW LONG THAT LEASE WAS FOR?

23 **A** YES. THE LEASE WAS SIGNED FOR ONE YEAR.

24 **Q** AND DID THEY LIVE IN THE UNIT FOR THE ENTIRE
25 TERM OF THE LEASE?

26 **A** NO.

27 **Q** DID THEY TERMINATE THE LEASE EARLY?

28 **A** YES, THEY DID.

1 **Q** AND DO YOU KNOW WHY?

2 **A** ONE OF THE MAIN REASONS WAS CONFLICTS WITH
3 MS. ██████████.

4 **Q** AND YOU WERE TOLD THAT?

5 **MR. KANANI:** OBJECTION. HEARSAY.

6 **THE COURT:** OVERRULED.

7 **BY MR. KENNEDY:**

8 **Q** WERE YOU TOLD THAT?

9 **A** YES.

10 **MR. KENNEDY:** YOUR HONOR, WITHDRAWN.

11 **Q** PLEASE TURN TO -- MR. OLSON, PLEASE TURN TO
12 EXHIBIT S, LOOKING AT PAGE 0003.

13 **A** YES.

14 **Q** DO YOU SEE WHERE I'M AT?

15 **A** YES.

16 **Q** IS THIS A COPY OF THE LEASE THAT YOU HAD
17 WITH THE ARGUES?

18 **A** YES.

19 **Q** IS THAT YOUR INITIALS AT THE BOTTOM OF THE
20 FIRST PAGE?

21 **A** YES.

22 **Q** AND IF YOU LOOK ON 0009, IS THAT YOUR
23 SIGNATURE?

24 **A** YES.

25 **Q** LOOKING UNDER SUBSECTION TWO, CAN YOU TELL
26 ME WHEN THE TERM OF THE LEASE WAS SET TO BEGIN?

27 **A** I'M SORRY. ON THAT PAGE?

28 **Q** ON PAGE 0003, SUBSECTION TWO.

1 **A** YES.

2 **Q** WHEN WAS THE LEASE SUPPOSED TO BEGIN?

3 **A** BEGIN OR TERMINATE?

4 **Q** BEGIN.

5 **A** FEBRUARY 20, 2018.

6 **Q** AND LOWER DOWN, WHEN IS THE DATE LISTED THAT
7 THE LEASE WAS SUPPOSED TO TERMINATE?

8 **A** FEBRUARY 19, 2019.

9 **Q** WHO DID YOU NEGOTIATE THE LEASE WITH?

10 **A** THROUGH A BROKER AND WITH TOM.

11 **Q** DID YOU EVER DISCUSS THE TERMS OF THE LEASE
12 WITH MAGGIE?

13 **A** NO. I NEVER HAD SPOKEN WITH MAGGIE BEFORE
14 UNTIL I MET HER AT COURT THE FIRST TIME.

15 **Q** DID YOU EVER DISCUSS THE TERMINATION OF THE
16 LEASE WITH MAGGIE ARGUE?

17 **A** NO.

18 **Q** DID YOU DISCUSS THE TERMINATION OF THE LEASE
19 WITH TOM ARGUE?

20 **A** YES, I DID.

21 **Q** PLEASE TURN TO EXHIBIT Q IN YOUR BINDER.

22 HAVE YOU HAD A CHANCE TO TAKE A LOOK AT IT?

23 **A** YES.

24 **Q** IS THIS AN E-MAIL THAT YOU SENT FEBRUARY 22,
25 2018?

26 **A** YES.

27 **THE COURT CLERK:** OBJECTION.

28 ///
29

1 **BY MR. KENNEDY:**

2 **Q** WHO IS THE E-MAIL SENT TO?

3 **THE COURT:** WHAT WAS THE OBJECTION?

4 **MR. KANANI:** I MAY BE REMEMBERING INCORRECTLY. I
5 DON'T KNOW IF THIS WAS ACTUALLY --

6 **THE COURT:** Q IS NOT ADMITTED.

7 **MR. KANANI:** AND I BELIEVE --

8 **THE COURT:** WHAT IS YOUR OBJECTION?

9 **MR. KANANI:** IT MISSTATES FACTS IN EVIDENCE THAT
10 THE E-MAIL IS NOT IN EVIDENCE YET.

11 **MR. KENNEDY:** I'M ESTABLISHING A FOUNDATION.

12 **THE COURT:** ACTUALLY, HE LED THE WITNESS WHICH IS
13 THE PROPER OBJECTION. SUSTAIN THAT. LAY A FOUNDATION.
14 MOVE TO ADMIT.

15 **BY MR. KENNEDY:**

16 **Q** DO YOU RECALL SENDING THIS E-MAIL ON
17 FEBRUARY 22, 2018?

18 **A** YES, I DO.

19 **MR. KENNEDY:** YOUR HONOR, I WOULD MOVE EXHIBIT Q
20 AND S INTO EVIDENCE.

21 **THE COURT:** LET'S TAKE LETTER Q FIRST. ANY
22 OBJECTION TO LETTER Q?

23 **MR. KANANI:** LACKS FOUNDATION. AND AUTHENTICITY.

24 **THE COURT:** WHY IS THIS RELEVANT, MR. KENNEDY?
25 OFFER OF PROOF, WHAT DOES THIS HAVE TO DO WITH
26 MR. OLSON'S REQUEST FOR CIVIL HARASSMENT RESTRAINING
27 ORDERS OR, FOR THAT MATTER, MS. ██████████'S REQUEST FOR
28 RESTRAINING ORDERS AND NOT THE SEPARATE CIVIL LAWSUITS?

1 **MR. KENNEDY:** THIS IS PART OF -- THIS IS NOT PART
2 OF THE SEPARATE LAWSUITS. MR. OLSON IS A DEFENDANT IN
3 BOTH LAWSUITS. THIS IS WHAT WE DESCRIBED EARLIER AS HIS
4 INABILITY TO USE THE PROPERTY BECAUSE OF THE HARASSMENT
5 THAT HE HAS SUSTAINED AND SO HAVE HIS TENANTS SUSTAINED
6 IN CONSEQUENCE OF INTERACTIONS WITH MS. [REDACTED].
7 MS. ARGUE TESTIFIED ABOUT THIS ISSUE. MR. OLSON IS
8 TESTIFYING ABOUT IT TODAY AS PART OF OUR REQUEST WHICH
9 WAS PREVIOUSLY STATED IN THE COURT, TO EXTEND THE
10 TEMPORARY RESTRAINING ORDER TO PERMANENT RESTRAINING
11 ORDER AND TO EXTEND ITS SCOPE TO HIS UNIT AND ANYONE
12 OCCUPYING THE UNIT.

13 **THE COURT:** MR. KANANI, ARGUMENT ON EXHIBIT Q.

14 **MR. KANANI:** WE FEEL THAT THE EXHIBIT SIMPLY IS NOT
15 RELEVANT. IF THERE WAS AN ISSUE BETWEEN MR. OLSON AND
16 MS. [REDACTED], HE CAN TESTIFY TO IT HIMSELF WITHOUT THIS
17 DOCUMENT. AND IF THERE WAS AN ISSUE BETWEEN MS. [REDACTED]
18 AND MS. ARGUE, THAT IS NOT RELEVANT TO THESE PROCEEDINGS.

19 **THE COURT:** THE COURT DOES NOT HAVE JURISDICTION TO
20 EXTEND A RESTRAINING ORDER IN A CIVIL HARASSMENT CONTEXT
21 TO, QUOTE/UNQUOTE, ANYONE ELSE WHO WILL EVER OCCUPY THE
22 UNIT. THE ZONE OF PROTECTION COVERS THE PROTECTED PERSON
23 HERE, MR. OLSON, AND MEMBERS OF HIS HOUSEHOLD AND HIS
24 FAMILY WHILE THEY'RE ON THE PREMISES OR LIVE THERE.
25 OTHER PERSONS WHO MAY FEEL HARASSED HAVE SEPARATE AND
26 INDIVIDUAL RIGHTS TO FILE FOR CIVIL HARASSMENT
27 RESTRAINING ORDERS.

28 SO WHILE MR. OLSON UNDER THE TEMPORARY

1 ORDERS IS THE OWNER AND OCCUPIER, EVEN PART TIME OF THAT
2 UNIT, HE IS ENTITLED TO TEMPORARY PROTECTION, IF GRANTED,
3 PERMANENT PROTECTION, THAT CAN'T BE EXTENDED BY FIAT TO
4 ANYONE ELSE, WHOEVER OCCUPIES THE PLACE. MR. AND
5 MRS. ARGUE HAVE THEIR OWN SEPARATE STANDING ALONE
6 INDEPENDENT RIGHTS TO SEEK RESTRAINING ORDERS IF THEY
7 BELIEVE MS. ██████████ IS HARASSING THEM.

8 NEVERTHELESS, YOUR ARGUMENT TO THE COURT AT
9 THE BEGINNING OF THIS CASE IS THAT THERE IS A THEORY THAT
10 MS. ██████████'S ACTIONS INTERRUPT OR INTERFERE WITH
11 MR. OLSON'S QUIET USE OF HIS OWN PROPERTY. CURRENT
12 EVIDENCE IS THAT HE OWNS THE PROPERTY, HIS UNIT. SO THIS
13 HAS SOME TENDENCY TOWARD THAT THEORY. I'LL DETERMINE HOW
14 MUCH WEIGHT TO GIVE IT.

15 I WILL OVERRULE THE OBJECTION AND ADMIT
16 EXHIBIT Q. AND I HAVE GIVEN WHAT I THINK ARE SOME
17 INDICATIONS AS TO HOW I AM GOING TO LIMIT THE USEFULNESS
18 OR WEIGHT OF THIS EVIDENCE.

19
20 (EXHIBIT Q WAS RECEIVED INTO EVIDENCE.)
21

22 **THE COURT:** S WAS THE OTHER ONE?

23 **MR. KENNEDY:** YES.

24 **THE COURT:** SO THIS DIVES DEEPER INTO THE SAME
25 ISSUE. I'M NOT REALLY SURE I NEED TO HEAR THIS OR NEED
26 TO CONSIDER A LEASE WHEN I KNOW THAT MR. AND MRS. ARGUE
27 WERE TENANTS, PROSPECTIVE TENANTS, FORMER TENANTS, AND I
28 HAVE GIVEN YOU MY THOUGHT ABOUT THEY'RE NOT ENTITLED TO

1 PROTECTION UNDER MR. OLSON'S RESTRAINING ORDER. ONLY
2 MR. OLSON AND THE OTHER PERSONS THAT I DESCRIBED.

3 SO ON MY OWN MOTION, I WILL EXCLUDE THIS. I
4 HAVE THE EVIDENCE THROUGH THE TESTIMONY.

5 **MR. KENNEDY:** I APPRECIATE THAT.

6 **THE COURT:** LET'S BREAK FOR LUNCH. SEE YOU ALL AT
7 2:00 O'CLOCK.

8

9 (NOON RECESS WAS TAKEN.)

10

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COPYING RESTRICTED PURSUANT TO GOV'T CODE SECTION 69954(D)

1 CASE NUMBER: [REDACTED] R/T [REDACTED]
2 CASE NAME: [REDACTED] V. OLSON
3 VAN NUYS, CALIFORNIA 11/16/18
4 DEPARTMENT NO. NWD HON. MICHAEL J. CONVEY, JUDGE
5 REPORTER: MARLENE BURRIS, CSR NO. 8424
6 TIME: 2:26 P.M.
7

8 APPEARANCES:

9 (AS HERETOFORE NOTED.)
10
11

12 **THE COURT:** BACK ON THE RECORD. AND WE'RE GOING TO
13 RESUME WHERE WE LEFT OFF.

14 **MR. KENNEDY:** YES, SIR.

15 **THE COURT:** PETITIONER ON THE WITNESS STAND.

16 **MR. KENNEDY:** YES, SIR.

17 **THE COURT:** MS. [REDACTED], IF YOU COME BACK UP TO
18 THE --

19 **MR. KENNEDY:** I BELIEVE MR. OLSON WAS ON THE STAND.
20

21 **CURTIS OLSON,**

22 THE WITNESS ON THE STAND AT THE TIME OF THE NOON RECESS,
23 HAVING BEEN PREVIOUSLY SWORN, TESTIFIED FURTHER AS
24 FOLLOWS:
25

26 **THE COURT:** THAT'S RIGHT. RESPONDENT
27 CASE-IN-CHIEF. RESPONDENT ON DIRECT. NOW I GOT IT.

28 MR. OLSON, COME BACK TO THE WITNESS STAND.

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1 YOU WERE SWORN THIS MORNING AND YOU'RE STILL UNDER OATH.
2 BUT PLEASE RESTATE YOUR NAME SO WE HAVE THAT PLACE MARKER
3 IN THE RECORD.

4 **THE WITNESS:** CURTIS OLSON.

5 **THE COURT:** THANK YOU.

6 MR. KENNEDY.

7
8 **DIRECT EXAMINATION (CONTINUED)**

9 **BY MR. KENNEDY:**

10 **Q** MR. OLSON, BEFORE THE BREAK, YOU WERE
11 TESTIFYING ABOUT AN INCIDENT THAT HAPPENED AT THE [REDACTED]
12 IN OR AROUND SEPTEMBER 10, 2017. DO YOU REMEMBER THAT?

13 **A** YES.

14 **Q** SINCE THAT INCIDENT, DO YOU HAVE ANY PLANS
15 TO RETURN TO THE [REDACTED]?

16 **A** NO, I DO NOT.

17 **Q** WHY NOT?

18 **A** NOT SAFE FOR ME. I'M AFRAID FOR JUST MY
19 SAFETY. I'M AFRAID IF I GO IN THERE I MIGHT BE SUED FOR
20 SOMETHING. IT'S NOT A GOOD PLACE FOR ME TO BE ANYMORE.
21 IT'S BEEN A NICE RUN BUT IT'S OVER WITH.

22 **Q** DID YOU FEEL THAT IT WAS UNSAFE AT THE TIME
23 THAT YOU FILED YOUR RESTRAINING ORDER APPLICATION BACK IN
24 SEPTEMBER OF 2017.

25 **A** 100 PERCENT.

26 **Q** DO YOU STILL FEEL THAT WAY TODAY?

27 **A** YES.

28 **MR. KENNEDY:** NO FURTHER QUESTIONS, YOUR HONOR.

1 DESCRIBED PREVIOUSLY ON IN SEPTEMBER OF 2017?

2 **A** THE VIDEO THAT WAS UP HERE?

3 **Q** YES.

4 **A** THAT WAS SHOWN UPSIDE-DOWN, THAT ONE?

5 **THE COURT:** ARE YOU TALKING ABOUT EXHIBIT GG, THE
6 ONE PROFFERED BY MR. OLSON?

7 **MR. KANANI:** YES.

8 **THE COURT:** THE ONE THAT HAD A SIDEWAYS IMAGE?

9 **THE WITNESS:** ACTUALLY UPSIDE-DOWN.

10 **THE COURT:** THE ONE WE SHOWED TODAY?

11 **MR. KANANI:** YES, YOUR HONOR.

12 **THE COURT:** THAT VIDEO.

13 **THE WITNESS:** WHAT'S YOUR QUESTION?

14 **BY MR. KANANI:**

15 **Q** DO YOU REMEMBER IT?

16 **A** I DO.

17 **Q** WERE YOU THE ONE MAKING THAT RECORDING?

18 **A** YES. I HAD MY PHONE NEAR MY WAIST HOLDING
19 IT DOWN LIKE THIS LOW.

20 **Q** DID YOU OBTAIN CONSENT OF MS. [REDACTED] TO
21 RECORD HER ON THAT VIDEO?

22 **A** I DID NOT.

23 **Q** DID YOU OBTAIN CONSENT FROM THE INDIVIDUAL
24 WHO WAS AT THE DOOR IN THE PURPLE SHIRT TO RECORD THAT
25 VIDEO?

26 **A** THE GUY WHO WAS HARASSING ME?

27 **Q** THE INDIVIDUAL THAT YOU ALLEGE WAS HARASSING
28 YOU.

1 **A** HE WAS HARASSING AND, NO, I DID NOT GET
2 APPROVAL FROM HIM.

3 **Q** DID YOU OBTAIN CONSENT FROM MR. FOTSO WHO
4 WAS IN THE BACKGROUND OF THE VIDEO AT ONE POINT?

5 **A** I DID NOT.

6 **Q** MR. OLSON, DID YOU FILE YOUR CROSS PETITION
7 FOR CIVIL HARASSMENT AGAINST MS. ██████████ IN RETALIATION
8 TO HER REQUEST FOR CIVIL HARASSMENT RESTRAINING ORDER
9 AGAINST YOU?

10 **A** NO.

11 **Q** DO YOU BELIEVE THAT THE VIDEO I SHOWED
12 EARLIER TODAY, WHICH IS MARKED AS RESPONDENT'S EXHIBIT
13 GG, IS ACCURATE ACCORDING TO YOUR MEMORY OF EVENTS THAT
14 DAY?

15 **A** YES. IT WAS SHOWN UPSIDE-DOWN. I'M NOT
16 SURE IF THAT WAS HELPFUL FOR EVERYONE WATCHING IT.

17 **Q** ON THAT DAY DURING THAT INCIDENT, DID YOU
18 HEAR ANYONE VERBALLY THREATEN YOU AT THE TIME?

19 **A** I'M NOT SURE WHAT THE WORDS WERE. IT FELT
20 LIKE THREATS COMING AT ME.

21 **Q** DID YOU HEAR ACTUAL VERBAL THREATS; CALLS
22 FOR A YES OR NO?

23 **MR. KENNEDY:** ASKED AND ANSWERED.

24 **THE COURT:** OVERRULED.

25 **THE WITNESS:** I HEARD MS. ██████████ SAYING, "GET IN
26 THERE, GET IN THERE."

27 **THE COURT:** THANK YOU.

28 ///
29

1 **BY MR. KANANI:**

2 **Q** IS THAT THE THREAT THAT YOU WERE REFERRING
3 TO IN YOUR APPLICATION FOR A CIVIL HARASSMENT RESTRAINING
4 ORDER?

5 **A** NO. THERE WAS MORE TO IT THAN THAT.

6 **Q** WERE YOU PHYSICALLY INJURED DURING THAT
7 INCIDENT AT ALL?

8 **A** NO.

9 **Q** WERE YOU -- DID ANYONE THREATEN TO
10 PHYSICALLY INJURE YOU DURING THAT INCIDENT?

11 **A** I FELT A THREAT, YES.

12 **Q** BUT DID THEY THREATEN TO PHYSICALLY INJURE
13 YOU?

14 **MR. KENNEDY:** ASKED AND ANSWERED.

15 **THE WITNESS:** I FELT THREATENED.

16 **THE COURT:** OVERRULED.

17 THAT IS NOT THE QUESTION. DID ANYONE SAY
18 WORDS THAT THEY WOULD PHYSICALLY TOUCH YOU OR HARM YOU?

19 **THE WITNESS:** NO, NOT THOSE WORDS.

20 **MR. KANANI:** NO FURTHER QUESTIONS, YOUR HONOR.

21 **THE COURT:** REDIRECT.

22 **MR. KENNEDY:** YES, BRIEFLY.

23
24 **REDIRECT EXAMINATION**

25 **BY MR. KENNEDY:**

26 **Q** MR. OLSON, WHY WERE YOU FILMING WITH YOUR
27 PHONE DURING THE INCIDENT?

28 **A** BECAUSE AFTER THEY HAD SERVED ME THE GUY

1 CAME TO DOUG'S DOOR AND THERE WAS NO REASON FOR THAT
2 WHATSOEVER. HE HAD SERVED ME THE PAPERS HE WANTED TO
3 SERVE ME, AND NOW HE'S SHOWING UP ON THE DOOR. AND HE
4 WANTED TO COME IN, AND DOUG SAID YOU'RE NOT COMING IN,
5 STOP, BACK AWAY.

6 **Q** SO WHY DID YOU TURN ON THE VIDEO FEATURE OF
7 YOUR PHONE AT THAT TIME?

8 **A** I THOUGHT IT WAS AN OPPORTUNITY IF I'M GOING
9 TO GET SMACKED OR SOMETHING LIKE YOU SEE ON T.V. AND YOU
10 SEE WHAT HAPPENS AND PEOPLE RECORD THINGS ALL THE TIME.
11 I THOUGHT I BETTER RECORD THIS.

12 **MR. KENNEDY:** NO FURTHER QUESTIONS, YOUR HONOR.

13 **THE COURT:** RE-CROSS.

14 **MR. KANANI:** NO, YOUR HONOR.

15 **THE COURT:** YOU MAY STEP DOWN. RETURN TO THE TABLE
16 NEXT TO YOUR ATTORNEY. THANK YOU.

17 MR. KENNEDY, NEXT WITNESS ON BEHALF OF
18 MR. OLSON'S CASE-IN-CHIEF.

19 **MR. KENNEDY:** NO FURTHER WITNESSES.

20 **THE COURT:** ALL OF YOUR EXHIBITS IN THAT YOU WANT
21 IN EVIDENCE OR ARE THERE ADDITIONAL ONES THAT YOU WANT TO
22 MOVE IN AT THAT TIME?

23 **MR. KENNEDY:** ALL OF OUR EXHIBITS ARE IN EVIDENCE,
24 YOUR HONOR.

25 **THE COURT:** SO I HAVE A, E, F, G, H, J, O, AA, BB,
26 FF, GG.

27 **MR. KENNEDY:** YES, YOUR HONOR. THANK YOU.

28 **THE COURT:** DO YOU REST?

1 **MR. KENNEDY:** YES, YOUR HONOR.

2 **THE COURT CLERK:** WE ALSO HAD Q SUBMITTED.

3 **MR. KENNEDY:** THAT IS CORRECT.

4 **THE COURT:** Q WAS ADMITTED?

5 **MR. KENNEDY:** Q WAS.

6 **THE COURT:** Q ALSO ADMITTED. S WAS NOT ADMITTED.
7 THANK YOU.

8 ALL RIGHT. MR. KANANI, YOUR CASE ON
9 REBUTTAL, ANY WITNESSES?

10 **MR. KANANI:** WE HAVE -- I HAVE SOME QUESTIONS FOR
11 THE COURT. WE HAVE ONE LIVE WITNESS WHO WOULD TESTIFY
12 BUT SHE'S NOT AVAILABLE UNTIL MONDAY MORNING.

13 **THE COURT:** SORRY.

14 **MR. KANANI:** OKAY. WE HAVE TWO -- WE HAVE ONE
15 INDIVIDUAL WHO WISHES TO PRESENT A DECLARATION THAT
16 REBUTS THE TESTIMONY OF DOUGLAS ECONN THAT WON'T BE READY
17 UNTIL MONDAY MORNING.

18 **THE COURT:** SORRY AGAIN.

19 **MR. KANANI:** BESIDES THAT, WE HAVE THREE OTHER
20 TRANSCRIPTIONS OF RECORDINGS THAT WE WOULD PRESENT TO THE
21 COURT, CERTIFIED TRANSCRIPTIONS, AND WE CAN PRESENT THE
22 INDIVIDUALS SOLE -- WHO MADE THE RECORDINGS SOLELY FOR
23 THE PURPOSE OF AUTHENTICATING BUT AGAIN NOT AVAILABLE
24 UNTIL MONDAY MORNING.

25 **THE COURT:** THIS IS YOUR CASE ON REBUTTAL BEING
26 CALLED NOW.

27 **MR. KANANI:** I HAVE NOTHING.

28 **THE COURT:** THERE'S NO STOPPING A CASE AT 2:30 IN

1 THE AFTERNOON BECAUSE WITNESSES ARE NOT HERE AND NOT
2 READY TO GO. I CAN REST YOUR CASE UNDER THE LOCAL RULES
3 OF THE SUPERIOR COURT.

4 **MR. KANANI:** MAY WE FILE ANY DECLARATIONS OR
5 TRANSCRIPTIONS LATER ON?

6 **THE COURT:** THIS IS THE TIME FOR YOUR REBUTTAL
7 EVIDENCE. DO YOU HAVE ANY?

8 **MR. KANANI:** NOT READY AT THIS TIME.

9 **THE COURT:** I'M NOT MAKING THIS STUFF UP. IT'S IN
10 THE LOCAL RULES.

11 **MR. KANANI:** ONE OF THE -- I DON'T KNOW IF THIS
12 MAKES A DIFFERENCE. ONE OF THE RECORDINGS WAS FROM
13 MR. MORENO WHO WAS UNABLE TO APPEAR IN PERSON. I AM
14 UNSURE IF THAT HAS ANY EFFECT ON THE COURT'S RULING OR
15 NOT. I WANTED TO AT LEAST PRESENT THE INFORMATION.

16 **THE COURT:** THANK YOU. THE COURT REFERS PARTIES
17 AND COUNSEL TO LOS ANGELES COUNTY SUPERIOR COURT LOCAL
18 RULE 3.25, CASE MANAGEMENT CONFERENCE, WHICH THIS COURT
19 HELD PREVIOUSLY AND ORDERED THIS CASE SET FOR TRIAL. AND
20 AS I SAID AT THE BEGINNING OF THIS CASE WHEN PARTIES WERE
21 GIVING ME WITNESS TIME ESTIMATES, I WAS REFERRING TO 3.25
22 SUBDIVISION H, REASONABLE TRIAL TIME ESTIMATE.

23 COUNSEL MUST PROVIDE THE COURT WITH
24 REASONABLE AND TIME ESTIMATES FOR TRIAL. IF THE TIME
25 ESTIMATE OF EITHER PARTY IS EXCEEDED, THE COURT MAY IN
26 ITS DISCRETION DEEM ONE OR BOTH OF THE PARTIES TO HAVE
27 RESTED, DEEM THE MATTER SUBMITTED, CONTINUE THE TRIAL TO
28 A NEW DATE OR DECLARE A MISTRIAL.

1 WE'RE AT THE PLACE NOW WHERE IT'S 2:35 WHEN
2 YOU FIRST SAID THIS, THAT YOU HAVE RUN OUT OF WITNESSES,
3 AND IT'S -- THE COURT SESSION GOES TO 4:00 P.M. TODAY.
4 SO I HAVE IT WITHIN MY DISCRETION TO REST YOUR CASE AND
5 CALL FOR CLOSING ARGUMENTS.

6 DO YOU WISH TO ARGUE AGAINST THAT,
7 MR. KANANI?

8 **MR. KANANI:** VERY BRIEFLY IF I PRESENT A QUICK ORAL
9 ARGUMENT. MY -- IN LISTENING TO THE COURT'S READING OF
10 THE STATUTE --

11 **THE COURT:** IT'S A COURT RULE.

12 **MR. KANANI:** I'M SORRY. OF THE LOCAL RULE, I
13 THOUGHT THAT THE LOCAL RULE WAS PREFACED WITH IF THE TIME
14 ESTIMATE HAS BEEN EXCEEDED. AM I ACCURATE?

15 **THE COURT:** CORRECT. THIS COURT ALSO RELIES ON
16 PUBLISHED CASES FROM THE SIXTH DISTRICT FOR TRIAL
17 MANAGEMENT, CALIFORNIA CRANE, AND I'LL HAVE THE CITE FOR
18 YOU IN A SECOND AND ANOTHER CASE CONAGRA. PEOPLE VS.
19 CONAGRA. AND IT'S WELL WITHIN THE COURT'S DISCRETION TO
20 SAY THAT YOU HAVE COME TO YOUR TIME ESTIMATE. YOUR
21 WITNESSES ARE NOT HERE AND YOU'RE NOT READY TO PROCEED.
22 YOUR CASE IS BEING DEEMED RESTED.

23 ANYTHING FURTHER YOU WISH TO ARGUE ABOUT
24 THAT?

25 **MR. KANANI:** NO, YOUR HONOR.

26 **THE COURT:** MR. KENNEDY, DO YOU WISH TO ARGUE ON
27 THAT?

28 **MR. KENNEDY:** I DO NOT.

1 **MR. KANANI:** I HAVE -- I WOULD ASK IF THE COURT IS
2 WILLING TO ACCEPT MS. [REDACTED] AS A BRIEF REBUTTAL
3 WITNESS?

4 **THE COURT:** ALL RIGHT. MS. [REDACTED] IS ALLOWED TO
5 TESTIFY AS A REBUTTAL WITNESS.

6 CALIFORNIA CRANE CITE IS 226 CAL.APP.4TH 12.
7 CONAGRA CAME IN THE YEAR 2017.

8
9 [REDACTED],
10 RE-CALLED AS A REBUTTAL WITNESS ON HER OWN
11 BEHALF, HAVING BEEN PREVIOUSLY SWORN, FURTHER
12 TESTIFIED AS FOLLOWS:

13
14 **THE COURT:** MS. [REDACTED], YOU HAVE BEEN CALLED AS A
15 WITNESS. YOU WERE SWORN PREVIOUSLY TODAY. YOU'RE STILL
16 UNDER OATH. YOU'RE BEING CALLED NOW IN REBUTTAL.

17 PLEASE COME FORWARD AND HAVE A SEAT AND
18 STATE YOUR NAME.

19 **THE WITNESS:** [REDACTED].

20 **THE COURT:** THANK YOU.

21
22 **REBUTTAL DIRECT EXAMINATION**

23 **BY MR. KANANI:**

24 **Q** MS. [REDACTED], WERE YOU PRESENT AT A BOARD
25 MEETING IN THE MONTH OF OCTOBER OF THE [REDACTED]
26 HOMEOWNER'S ASSOCIATION?

27 **A** YES, I WAS.

28 **Q** WAS THERE A SUGGESTION THAT ADDITIONAL

1 SECURITY BE ADDED TO THE [REDACTED] PROPERTY?

2 A YES.

3 Q DO YOU REMEMBER WHICH INDIVIDUAL FIRST MADE
4 THAT SUGGESTION?

5 A YES.

6 Q WHO WAS THAT INDIVIDUAL?

7 A CURT OLSON.

8 Q DID YOU HEAR HIM SAY IT YOURSELF VERBALLY.

9 A YES.

10 Q PRIOR -- ON A PRIOR DAY, MS. MONROY
11 TESTIFIED THAT ONLY SHE AND MR. SILVER HAD ACCESS TO THE
12 SURVEILLANCE CAMERAS AT [REDACTED] DO YOU REMEMBER
13 THAT?

14 A YES.

15 Q HAVE YOU EVER HAD A CONVERSATION WITH
16 MS. MONROY WHERE SHE SAID SOMETHING DIFFERENT?

17 A YES.

18 Q WHO DID SHE SAY HAD ACCESS TO THE
19 SURVEILLANCE CAMERAS AT [REDACTED]

20 **MR. KENNEDY:** OBJECTION. CALLS FOR HEARSAY.

21 **THE COURT:** SUSTAINED.

22 **MR. KENNEDY:** AND BEYOND THE SCOPE OF MR. OLSON'S
23 CASE-IN-CHIEF.

24 **THE COURT:** OVERRULED ON THAT. SUSTAINED AS TO THE
25 HEARSAY.

26 **MR. KANANI:** NO FURTHER QUESTIONS, YOUR HONOR.

27 **THE COURT:** CROSS-EXAMINATION.

28 **MR. KENNEDY:** NONE.

1 **THE COURT:** GO AHEAD AND TAKE THE SEAT BACK AT THE
2 TABLE.

3 ANY FURTHER WITNESSES ON REBUTTAL?

4 **MR. KANANI:** NO, YOUR HONOR.

5 **THE COURT:** DO YOU NOW REST?

6 **MR. KANANI:** WE DO.

7 **THE COURT:** ARE YOU READY FOR YOUR CLOSING
8 ARGUMENT -- OR STRIKE THAT.

9 MR. KENNEDY, DO YOU HAVE ANY REBUTTAL ON
10 YOUR CASE-IN-CHIEF?

11 **MR. KENNEDY:** WE DO.

12 **THE COURT:** CALL YOUR FIRST REBUTTAL WITNESS.

13 **MR. KENNEDY:** PETITIONER MR. OLSON CALLS DIEN LE.

14 **THE COURT:** MR. LE. COME FORWARD TO THE WITNESS
15 STAND. RAISE YOUR RIGHT HAND TO BE SWORN.

16
17 **DIEN LE,**

18 CALLED AS A REBUTTAL WITNESS BY THE RESPONDENT,
19 WAS SWORN AND TESTIFIED AS FOLLOWS:

20
21 **THE COURT CLERK:** YOU DO SOLEMNLY STATE THAT THE
22 TESTIMONY YOU MAY GIVE IN THE CAUSE NOW PENDING BEFORE
23 THIS COURT SHALL BE THE TRUTH, THE WHOLE TRUTH, AND
24 NOTHING BUT THE TRUTH, SO HELP YOU GOD?

25 **THE WITNESS:** I DO.

26 **THE COURT CLERK:** PLEASE BE SEATED.

27 **MR. KENNEDY:** YOUR HONOR, MAY I APPROACH TO TAKE --

28 **THE COURT:** HOLD ON.

1 PLEASE STATE AND SPELL YOUR NAME.

2 **THE WITNESS:** YES. DIEN LE. D-I-E-N. LAST NAME
3 L-E.

4 **THE COURT:** MR. KENNEDY.

5 **MR. KENNEDY:** MAY I APPROACH AND TAKE THE BINDER
6 OUT OF HIS WAY?

7 **THE COURT:** GO AHEAD.

8

9 (PAUSE IN THE PROCEEDINGS.)

10

11 **REBUTTAL DIRECT EXAMINATION**

12 **BY MR. KENNEDY:**

13 **Q** MR. LE, ARE YOU AN ATTORNEY ADMITTED TO
14 PRACTICE IN CALIFORNIA?

15 **A** YES, I AM.

16 **Q** WHEN WERE YOU ADMITTED TO PRACTICE IN
17 CALIFORNIA?

18 **A** IN 1996.

19 **Q** HAVE YOU BEEN AN ATTORNEY PRACTICING IN
20 CALIFORNIA SINCE THAT TIME?

21 **A** YES, I HAVE.

22 **Q** WHERE DID YOU ATTEND LAW SCHOOL?

23 **A** LOYOLA LAW SCHOOL, LOS ANGELES.

24 **Q** ARE YOU CURRENTLY REPRESENTING CURTIS OLSON
25 IN ANY CIVIL MATTER?

26 **A** YES. THERE'S ACTUALLY TWO PENDING CIVIL
27 ACTIONS RIGHT NOW.

28 **Q** WHO IS THE PLAINTIFF IN THOSE ACTIONS?

1 **A** JANE DOE WHICH IS ALSO THE PETITIONER.

2 **THE COURT:** HOLD ON. IS THERE AN ORDER ALLOWING
3 THE DISCLOSURE OF THE IDENTITY OF JANE DOE?

4 **THE WITNESS:** NO.

5 **MR. KENNEDY:** I'LL WITHDRAW THE QUESTION.

6 **THE COURT:** JANE DOE.

7 **BY MR. KENNEDY:**

8 **Q** HAVE YOU EVER REPRESENTED MR. OLSON BEFORE?

9 **A** BEFORE THESE TWO ACTIONS?

10 **Q** CORRECT.

11 **A** NO, I HAVE NOT.

12 **Q** WERE YOU IN THE COURTROOM EARLIER TODAY WHEN
13 MS. ██████████ OFFERED TESTIMONY REGARDING ALLEGED COMMENTS
14 MADE BY YOU?

15 **A** YES, I WAS SITTING IN THE AUDIENCE.

16 **Q** AND DO YOU RECALL HER TESTIFYING THAT YOU
17 THREATENED HER LIFE?

18 **A** YES, I DID HEAR THAT.

19 **Q** DO YOU RECALL HER TESTIFYING ABOUT BEING RUN
20 OVER BY A CAR, THAT YOU THREATENED THAT?

21 **A** I DID HEAR HER SAY THAT TODAY.

22 **Q** IS THERE ANY TRUTH TO ANYTHING THAT SHE SAID
23 WITH REGARD TO THOSE COMMENTS?

24 **A** NO.

25 **Q** DO YOU RECALL HER TESTIFYING THAT MR. OLSON
26 WAS GOING TO HURT YOU -- HURT HER IF SHE DID NOT DISMISS
27 THE CASE?

28 **THE COURT:** WHY DON'T YOU RESTATE THE QUESTION SO

1 IT'S CLEAR.

2 **BY MR. KENNEDY:**

3 **Q** DO YOU RECALL MS. ██████████ TESTIFYING THAT
4 MR. -- THAT YOU TOLD HER MR. OLSON WOULD HURT HER IF THE
5 CASE WAS NOT DISMISSED?

6 **A** YES, I DID HEAR HER SAY THAT.

7 **Q** IS THERE ANY TRUTH TO THAT?

8 **A** NO.

9 **MR. KENNEDY:** NO FURTHER QUESTIONS, YOUR HONOR.

10 **THE COURT:** CROSS-EXAMINATION.

11 **MR. KANANI:** NO QUESTIONS, YOUR HONOR.

12 **THE COURT:** MAY THIS WITNESS BE EXCUSED?

13 **MR. KENNEDY:** HE MAY.

14 **THE COURT:** YOU MAY STEP DOWN.

15 **THE WITNESS:** THANK YOU, YOUR HONOR.

16 **THE COURT:** NEXT REBUTTAL WITNESS.

17 **MR. KENNEDY:** CALL MR. OLSON.

18

19 **CURTIS OLSON,**

20 RE-CALLED AS A REBUTTAL WITNESS ON HIS OWN
21 BEHALF, HAVING BEEN PREVIOUSLY SWORN, FURTHER
22 TESTIFIED AS FOLLOWS:

23

24 **THE COURT:** MR. OLSON, COME BACK TO THE WITNESS
25 STAND. THIS IS A DIFFERENT PART OF THE CASE CALLED
26 REBUTTAL.

27 YOU WERE SWORN. YOU'RE STILL UNDER OATH.

28 TAKE A SEAT. RESTATE YOUR NAME SO WE HAVE THAT PLACE

1 MARKER IN THE RECORD.

2 **THE WITNESS:** CURTIS OLSON.

3 **THE COURT:** MR. KENNEDY, DIRECT ON REBUTTAL.

4
5 **REBUTTAL DIRECT EXAMINATION**

6 **BY MR. KENNEDY:**

7 **Q** MR. OLSON, PLEASE TAKE THE PURPLE BINDER
8 LOCATED TO YOUR RIGHT AND TURN TO EXHIBIT 14. PLEASE
9 TAKE A LOOK AND LET ME KNOW WHEN YOU'RE FINISHED.

10 **A** THERE'S A LOT OF PAGES. I SEE THE BULK OF
11 IT.

12 **Q** YOU DON'T HAVE TO READ EVERY WORD. TAKE A
13 LOOK AT IT. I'LL ASK YOU FOUNDATIONAL QUESTIONS.

14 **A** OKAY. THERE'S A LOT HERE. I'M READY.

15 **Q** HAVE YOU SEEN THESE PAPERS BEFORE THAT
16 REPRESENT -- THAT ARE COMPRISED EXHIBIT 14?

17 **A** I HAVE SEEN THE DECLARATION AND THERE'S ALSO
18 I THINK -- YES, I HAVE SEEN THEM BOTH. THERE'S TWO
19 DIFFERENT ONES. I HAVE SEEN THEM.

20 **Q** I JUST WANT TO CONFIRM WHAT YOU JUST SAID.
21 IT APPEARS THERE ARE TWO DECLARATIONS IN HERE. I'M GOING
22 TO DIRECT YOUR ATTENTION TO A COUPLE OF THE ALLEGATIONS
23 IN THESE DECLARATIONS.

24 **A** YES.

25 **Q** AND FOR THE RECORD, THE FIRST DECLARATION IS
26 LISTED DECLARATION OF AMADO MORENO. DO YOU SEE WHERE
27 THAT IS?

28 **A** YES.

1 **Q** DO YOU RECALL MR. MORENO TESTIFYING IN THIS
2 CASE?

3 **A** NO.

4 **Q** PARAGRAPH TEN OF THE FIRST PAGE, DO YOU SEE
5 THAT?

6 **A** YES.

7 **Q** (READING) :

8 DURING THIS TIME IN MAY OF 2017, JANE DOE
9 TOLD ME SHE SAW A MAN ACROSS THE STREET FILMING
10 HER. AND SO SHE TOOK OUT HER IPHONE TO FILM
11 HIM, AND THEN JANE DOE RAN TOWARD HIS CAR TO GET
12 CLOSER TO THE LICENSE PLATE NUMBER BUT THE MAN
13 SEEING HER QUICKLY GOT IN HIS CAR AND DROVE WAY.

14 DO YOU SEE THAT?

15 **A** YES.

16 **Q** DID YOU EVER ASK ANYONE TO FILM JANE DOE,
17 TAKE PHOTOS OF JANE DOE?

18 **A** NEVER.

19 **MR. KANANI:** OBJECTION. COMPOUND.

20 **THE COURT:** SUSTAINED. YOU MAY REPHRASE. BREAK IT
21 DOWN. THERE'S A DIFFERENCE. PHOTOS OR VIDEO, TWO
22 DIFFERENT KINDS OF MEDIA.

23 **BY MR. KENNEDY:**

24 **Q** DID YOU EVER HIRE ANYONE TO TAKE VIDEO OF
25 MS. ████████?

26 **A** NO.

27 **Q** DID YOU EVER HIRE ANYONE TO TAKE PHOTOS OF
28 MS. ████████?

1 **A** NO.

2 **Q** CAN YOU LOOK AT PARAGRAPH 13, PLEASE.

3 (READING) :

4 ON ANOTHER OCCASION -- THE PARAGRAPH
5 READS -- A MAN WHO LOOKED LIKE A PRIVATE
6 INVESTIGATOR, TALL AND SLENDER, WHITE, WITH
7 SHORT LIGHT BROWN HAIR IN HIS LATE 50S OR 60S,
8 CHECKED INTO A HOTEL FOR ONE NIGHT.

9 DO YOU SEE THAT?

10 **A** YES.

11 **Q** THE NEXT PARAGRAPH IS, "IN THE MORNING, HE
12 WAS SITTING IN THE BACK AREA OF RESTAURANT WHEN JANE DOE
13 CAME IN ABOUT 11:00 A.M." DO YOU SEE THAT?

14 **A** YES.

15 **Q** ARE YOU AWARE OF ANYONE THAT MATCHES THAT
16 DESCRIPTION?

17 **A** THERE COULD BE THOUSANDS OF PEOPLE THAT
18 MATCH THAT DESCRIPTION.

19 **Q** DID YOU HIRE ANYONE MATCHING THAT
20 DESCRIPTION TO STALK OR SURVEIL MS. [REDACTED] ?

21 **A** NO.

22 **Q** PLEASE LOOK AT PARAGRAPH 19. THE PARAGRAPH
23 READS, (READING) :

24 ON ONE OCCASION, I WITNESSED A MAN WITH A
25 LARGE TELEPHOTO CAMERA OR MAYBE IT WAS A FILM
26 CAMERA BEHIND HER ABOUT HALF A BLOCK TAKING
27 IMAGES DIRECTED TOWARD HER. JANE DOE DID NOT
28 TURN AROUND AND NOTICE THIS PERSON.

1 DID YOU SEE THAT?

2 **A** YES.

3 **Q** DID YOU EVER HIRE ANYONE TO USE A LARGE
4 TELEPHOTO CAMERA TO FOLLOW JANE DOE?

5 **A** NO.

6 **Q** TO TAKE PICTURES OF JANE DOE?

7 **A** NO.

8 **Q** PLEASE LOOK AT PARAGRAPH 27. ACTUALLY, AS
9 FOUNDATION, PLEASE LOOK AT PARAGRAPH 22 WHICH READS,
10 (READING):

11 ON OR ABOUT JUNE 23, 2017, A MAN NAMED
12 CURTIS OLSON CAME TO A RESTAURANT WITH TWO
13 MEN -- TO THE RESTAURANT WITH TWO MEN FOR LUNCH
14 AT ABOUT THE SAME TIME THAT JANE DOE WOULD
15 USUALLY COME TO THE RESTAURANT FOR LUNCH.

16 DO YOU SEE THAT?

17 **A** YES.

18 **Q** DO YOU HAVE ANY IDEA WHEN JANE DOE WOULD GO
19 TO THE CAFÉ?

20 **A** NO.

21 **Q** ANY IDEA WHEN SHE TYPICALLY EATS LUNCH OR
22 WHERE?

23 **A** NO.

24 **Q** THEN TO PARAGRAPH 27, "THE TWO MEN DID NOT
25 SEEM TO BE A FRIEND OF OLSON'S. MORE LIKE PEOPLE
26 EMPLOYED BY HIM."

27 HAVE YOU EVER GONE TO THE CAFÉ WITH ONE OF
28 YOUR EMPLOYEES?

1 **A** NOPE.

2 **Q** HAVE YOU EVER MET MR. MORENO?

3 **A** POSSIBLY. I DON'T KNOW.

4 **Q** WOULD YOU BE ABLE TO PICK HIM OUT OF A
5 LINEUP IF HE WAS STANDING BEFORE US TODAY?

6 **A** NO, I WOULD NOT.

7 **Q** DID YOU EVER GO TO THE CAFÉ ██████████ TO
8 SURVEIL MS. ██████████?

9 **A** I'M SORRY. WITH WHO?

10 **Q** TO SURVEIL MS. ██████████.

11 **A** NO.

12 **Q** DID YOU EVER INSTRUCT ANYONE TO GO TO THE
13 CAFÉ ██████████ TO SURVEIL MS. ██████████?

14 **A** NO.

15 **Q** DID YOU EVER INSTRUCT ANYONE TO GO TO THE
16 HOTEL ACROSS THE STREET FROM THE ██████████ TO
17 SURVEIL MS. ██████████?

18 **A** NO.

19 **Q** MS. ██████████ HAS PREVIOUSLY TESTIFIED ABOUT
20 ALLEGED MEN IN BLACK HIRED BY YOU TO HARASS/SURVEIL
21 HER -- WELL, LET'S TAKE IT ONE AT A TIME.

22 MS. ██████████ PREVIOUSLY TESTIFIED ABOUT
23 ALLEGED MEN IN BLACK HIRED BY YOU TO FOLLOW HER. HAVE
24 YOU EVER DONE THAT?

25 **MR. KANANI:** OBJECTION. BEYOND THE SCOPE.

26 **THE COURT:** OVERRULED.

27 **THE WITNESS:** NO. IT SEEMS COMPLETELY RIDICULOUS.

28 ///
29

1 **BY MR. KENNEDY:**

2 **Q** PLEASE TURN -- THE COPY THAT I HAVE DO NOT
3 HAVE PAGE NUMBERS. DO YOURS HAVE PAGE NUMBERS AT THE
4 BOTTOM?

5 **A** NO, THEY DON'T.

6 **Q** LET'S TRY AND WORK THROUGH THIS TOGETHER. I
7 APOLOGIZE. AS I'M LOOKING THROUGH THIS, IT LOOKS LIKE
8 THERE'S THREE DECLARATIONS. SO GOING TO THE SECOND
9 DECLARATION --

10 **THE COURT:** IS IT THE ONE ON PLEADING PAPER?

11 **MR. KENNEDY:** IT IS, YOUR HONOR.

12 **Q** AND IT'S ENTITLED "DECLARATION OF AMADO
13 MORENO," DATED APRIL 24, 2014. IS THAT WHERE YOU ARE?

14 **A** YES, I AM.

15 **MR. KANANI:** MR. KENNEDY SAID 2014.

16 **MR. KENNEDY:** '18. THANK YOU.

17 **Q** CAN YOU LOOK AT PARAGRAPH SEVEN, PLEASE?

18 **A** YES.

19 **Q** PARAGRAPH SEVEN READS, (READING):

20 ON OR ABOUT THE MONTH OF NOVEMBER OF
21 2017, SOMEONE CAME INTO THE CAFÉ AND TOLD ME
22 THAT MY LIFE WAS IN DANGER. AROUND THE SAME
23 TIME I BEGAN TO NOTICE THAT I WAS BEING FOLLOWED
24 IN MY CAR WHEN DRIVING HOME FROM WORK.

25 **A** YES.

26 **Q** DID YOU EVER FOLLOW MR. MORENO HOME FROM
27 WORK?

28 **A** NO.

1 **Q** DID YOU EVER HIRE ANYONE TO FOLLOW ANYONE
2 HOME?

3 **MR. KANANI:** OBJECTION. BEYOND THE SCOPE.

4 **THE COURT:** OVERRULED.

5 **THE WITNESS:** NO.

6 **BY MR. KENNEDY:**

7 **Q** PLEASE LOOK AT PARAGRAPH 11 WHICH READS,
8 (READING) :

9 THEN SHORTLY AFTER THE DANGER WARNING, A
10 MENTALLY ILL CRIMINAL THREATENED ME AT MY HOME
11 AND TRIED TO SET MY HOUSE ON FIRE. THE MAN WAS
12 APPREHENDED AND PUT IN PRISON.

13 DID YOU EVER HIRE ANYONE TO TRY TO SET
14 MR. MORENO'S HOUSE ON FIRE?

15 **A** SERIOUSLY?

16 **THE COURT:** ANSWER THE QUESTION, PLEASE.

17 **THE WITNESS:** NO.

18 **BY MR. KENNEDY:**

19 **Q** DO YOU KNOW ANY MENTALLY ILL CRIMINALS?

20 **A** NO.

21 **Q** THE NEXT PARAGRAPH READS, THIS IS PARAGRAPH
22 12, (READING) :

23 IN ADDITION, ON APRIL 14, 2018, I WENT
24 OUT TO A RESTAURANT FOR DINNER AND WAS GIVEN A
25 GLASS OF WATER. AS I DRANK THE WATER, I NOTICED
26 IT HAD AN ODD SMELL AND I SOON BECAME SICK AND
27 VOMITED.

28 DO YOU KNOW WHERE MR. MORENO EATS DINNER?

1 **A** NO.

2 **Q** HAVE YOU EVER POISONED ANY OF MR. MORENO'S
3 FOOD OR DRINK?

4 **A** NO.

5 **Q** HAVE YOU EVER HIRED SOMEONE TO DO THAT?

6 **A** NO.

7 **Q** FINALLY, PARAGRAPH 16, WHICH READS

8 (READING) :

9 LAST NIGHT ON APRIL 23, 2018, THE
10 CRIMINAL GOT OUT FROM PRISON, BROKE INTO MY
11 HOME, STOLE MY FILE WITH ALL MY DOCUMENTS AND
12 POLICE REPORTS RELATED TO ME BEING FOLLOWED IN
13 REGARDS TO PETITIONER.

14 DO YOU SEE THAT?

15 **A** YES.

16 **Q** DID YOU EVER HIRE A CRIMINAL TO BREAK OUT OF
17 PRISON?

18 **A** NO.

19 **Q** DID YOU EVER HIRE AN ESCAPED PRISONER TO
20 BREAK INTO MR. MORENO'S HOME?

21 **A** NO.

22 **Q** DID YOU EVER HIRE ANYONE TO STEAL DOCUMENTS
23 FROM MR. MORENO'S HOME?

24 **A** NO.

25 **Q** DID YOU EVER STEAL DOCUMENTS FROM
26 MR. MORENO'S HOME?

27 **A** NO.

28 **Q** DID YOU EVER BREAK INTO HIS HOME?

1 **A** NO.

2 **Q** HAVE YOU EVER BEEN IN PRISON?

3 **A** NO.

4 **Q** TURNING TO THE NEXT DECLARATION WHICH IS
5 TITLED "WITNESS TAMPERING OF AMADO MORENO, DECLARATION OF
6 AMADO MORENO." DO YOU SEE THAT DATED APRIL 30, 2018?

7 **A** YES.

8 **Q** LOOKING AT PARAGRAPH 11 WHICH READS

9 (READING) :

10 ON SATURDAY, APRIL 14, I DECIDED TO LEAVE
11 MY HOME VIA CAR TO GO GET SOMETHING TO EAT. AS
12 I WAS DRIVING, I NOTICED THE ROADS WERE BLOCKED
13 AHEAD OF ME WITH A NUMBER OF POLICE CARS BECAUSE
14 THERE WAS AN ACCIDENT, THUS I DECIDED TO DRIVE
15 HOME.

16 NEXT PARAGRAPH 12. THEN -- I THEN
17 NOTICED A TOW TRUCK FOLLOWING TOO CLOSELY BEHIND
18 ME TAKING PHOTOS OF MY CAR AND LICENSE PLATE.

19 DO YOU OWN A TOW TRUCK?

20 **A** NO.

21 **Q** HAVE YOU EVER HIRE ANYONE WHO OWNS A TOW
22 TRUCK TO FOLLOW MR. MORENO?

23 **A** NO.

24 **Q** HAVE YOU EVER HIRED ANYONE WHO OWNED A TOW
25 TRUCK TO TAKE PICTURES OF MR. MORENO?

26 **A** NO.

27 **Q** OR HIS CAR?

28 **A** NO.

1 **Q** PARAGRAPH 13. (READING):

2 THEN THE DRIVER OF THE TOW TRUCK DROVE UP
3 NEXT TO ME. AND I COULD CLEARLY SEE HE WAS
4 AFRICAN AMERICAN. HE CONTINUED TO DRIVE NEXT TO
5 ME AND ROLLED DOWN HIS PASSENGER WINDOW AND TOOK
6 PHOTOS OF ME. I ASKED HIM WHAT HE WAS DOING.
7 HE THEN YELLED AT ME, QUOTE, "I'M GOING TO SEND
8 YOU BACK TO MEXICO IN A BODY BAG," END QUOTE.

9 DO YOU SEE THAT?

10 **A** YES.

11 **Q** DID YOU EVER HIRE A TOW TRUCK DRIVER TO YELL
12 AT MR. MORENO, QUOTE, "I'M GOING TO SEND YOU BACK TO
13 MEXICO IN A BODY BAG," END QUOTE.

14 **A** NO.

15 **Q** LOOKING NOW AT PARAGRAPH 16. (READING):

16 THE TOW TRUCK DRIVER PURSUED ME. I THEN
17 NOTICED A RALPH'S GROCERY STORE NEARBY WITH A
18 NUMBER OF PEOPLE IN THE PARKING LOT. SO I
19 QUICKLY PULLED INTO THE PARKING LOT TO BE AMONG
20 THE SAFETY OF A NUMBER OF PEOPLE, WITNESSES
21 WATCHING.

22 PARAGRAPH 17: THE TOW TRUCK DRIVER
23 PULLED HIS TRUCK BEHIND MY CAR, OPENED HIS DOOR,
24 LEANED OUT AND WITH THE BUTT OF HIS BERETTA GUN
25 HE SMASHED OUT MY TAILLIGHT AND THEN HE SAID,
26 QUOTE, "THIS IS NOT THE LAST TIME YOU WILL SEE
27 ME," END QUOTE, AS HE DROVE OFF. HE WAS VERY
28 UPSET THAT HE WAS UNABLE TO KILL ME.

1 DO YOU SEE THAT?

2 **A** YES.

3 **Q** HAVE YOU EVER HIRED A TOW TRUCK DRIVER TO
4 FOLLOW MR. MORENO AND INSTRUCTED THAT INDIVIDUAL TO
5 THREATEN HIS LIFE?

6 **A** NO.

7 **Q** TO THREATEN HIM WITH A GUN?

8 **A** NO.

9 **Q** TO DESTROY HIS PROPERTY?

10 **A** NO.

11 **Q** AND FINALLY NO. 19. (READING):

12 I BELIEVE MR. OLSON HAS PUT A HIT ON MY
13 LIFE TO PREVENT ME FROM TESTIFYING ABOUT THE MEN
14 IN BLACK WHO ARE STALKING PETITIONER FOR
15 MR. OLSON.

16 DO YOU SEE THAT?

17 **A** I SEE THAT.

18 **Q** HAVE YOU PUT A HIT ON MR. MORENO'S LIFE?

19 **A** NO.

20 **Q** DID YOU HIRE MEN IN BLACK TO STALK
21 PETITIONER?

22 **A** NO.

23 **Q** PLEASE, YOU CAN SET THAT BOOK ASIDE. IS
24 THERE ANOTHER BLACK BINDER WITH CURTIS OLSON EXHIBITS UP
25 THERE?

26 **THE COURT:** WHICH ONE DO YOU WANT?

27 **MR. KENNEDY:** THAT'S THE ONE THAT I WANT.

28 **THE COURT:** THE SECOND VOLUME.

1 **MR. KENNEDY:** TURN TO EXHIBIT FF. I APOLOGIZE,
2 YOUR HONOR. I THINK THIS WAS ALREADY ADMITTED THROUGH
3 MS. [REDACTED]. I DON'T REMEMBER WHAT THE NUMBER WAS. I
4 DON'T WANT TO DUPLICATE.

5 **THE COURT:** FF WAS ADMITTED.

6 **MR. KENNEDY:** THANK YOU.

7 **Q** DO YOU HAVE FF IN FRONT OF YOU?

8 **A** YES, I DO.

9 **Q** THANK YOU. THERE'S BEEN TESTIMONY ABOUT A
10 LOCKBOX ISSUE. DO YOU RECALL THAT TESTIMONY?

11 **A** YES.

12 **Q** THERE'S BEEN ALLEGATIONS THAT MS. MONROY
13 STOLE MS. [REDACTED]'S LOCKBOX. DO YOU RECALL THAT
14 TESTIMONY?

15 **A** YES.

16 **Q** DID YOU ASK MS. ELSA MONROY TO STEAL THE
17 LOCKBOX?

18 **MR. KANANI:** OBJECTION. BEYOND THE SCOPE.

19 **THE COURT:** OVERRULED.

20 **THE WITNESS:** NO, I DO NOT.

21 **BY MR. KENNEDY:**

22 **Q** DO YOU HAVE ANY KNOWLEDGE OF MS. [REDACTED]'S
23 LOCKBOX BEING STOLEN?

24 **A** NO. COULD I RESTATE THAT. I HAVE HEARD IT
25 IN THIS COURT TODAY.

26 **Q** LOOKING AT PARAGRAPH 39, DO YOU HAVE THAT?
27 IT'S ON PAGE 0006.

28 **A** YES. I JUST OPENED IT.

1 **Q** READS, "A FEW MONTHS AFTER I FILED THE CIVIL
2 ACTION, I BEGAN SERVING DEFENDANTS IN THAT CASE."

3 JUST AS A BACKGROUND, I DON'T THINK I
4 READ -- THE TITLE OF THIS EXHIBIT IS "SUPPLEMENTAL
5 DECLARATION OF ██████████ ██████████."

6 AGAIN, PARAGRAPH 39. (READING):

7 A FEW MONTHS AFTER I FILED THE CIVIL
8 ACTION, I BEGAN SERVING DEFENDANTS IN THAT CASE.

9 A FEW MONTHS AFTER THIS, IN MAY OF 2017,
10 RESPONDENT'S EFFORTS TO STALK AND KEEP TABS OF
11 ME BECAME MUCH MORE AGGRESSIVE AND EXTREME.

12 MR. OLSON, HAVE YOU EVER STALKED
13 MS. ██████████?

14 **A** NEVER.

15 **Q** HAVE YOU EVER TRIED TO KEEP TABS ON HER?

16 **A** NEVER.

17 **Q** PLEASE TURN TO TAB 48 ON THE NEXT PAGE.

18 IT READS, "ON DECEMBER 19, 2017, ONE OF THE
19 MEN IN BLACK APPEARED IN THE BACK ALLEY OF THE ██████████
20 ██████████ I TOOK PHOTOGRAPHS OF HIM."

21 DID YOU EVER INSTRUCT A MAN WEARING BLACK TO
22 STALK MS. ██████████ AT THE ██████████

23 **A** NEVER.

24 **Q** THE NEXT PARAGRAPH 49. "THE VERY NEXT DAY
25 MY HOME WAS BROKEN INTO."

26 HAVE YOU EVER BROKEN INTO MS. ██████████'S
27 HOME?

28 **A** NEVER.

1 Q HAVE YOU EVER HIRED SOMEONE TO DO THAT?

2 A NEVER.

3 Q PARAGRAPH NUMBER 50 WHICH READS (READING):

4 THREE DAYS LATER ON DECEMBER 23, 2017, A

5 FRIEND OF MINE MR. GIL GRIARTE --

6 **THE COURT:** SPELL THAT, PLEASE.

7 **MR. KENNEDY:** G-R-I-A-R-T-E.

8 -- WAS HELPING ME CLEAN THE STOVE IN MY

9 UNIT. AS I STARTED SCRUBBING IT WITH A CLEANING

10 SOLUTION, IT CAUSED AN EXPLOSION IN MY KITCHEN.

11 FLAMES BEGAN SHOOTING OUT OF MY STOVE, AND WE

12 QUICKLY CALLED THE [REDACTED] FIRE DEPARTMENT.

13 THE STOVE WAS OFF THE WHOLE TIME AND HAD NOT

14 BEEN USED SINCE THE BREAK-IN.

15 HAVE YOU EVER HIRED SOMEONE TO TAMPER WITH

16 MS. [REDACTED]'S STOVE?

17 A NO.

18 Q HAVE YOU EVER DONE THAT YOURSELF?

19 A NO.

20 Q MR. OLSON, DO YOU RECALL THAT IN 2016

21 MS. [REDACTED] FILED A COMPLAINT AGAINST YOU AND THE

22 HOMEOWNER'S ASSOCIATION?

23 A YES.

24 **MR. KANANI:** OBJECTION. RELEVANCE.

25 **MR. KENNEDY:** I WAS NOT FINISHED YET. I'M SORRY.

26 Q AGAINST YOU AND THE HOMEOWNER'S ASSOCIATION

27 WITH HUD?

28 **MR. KANANI:** OBJECTION. RELEVANCE.

1 **THE COURT:** OVERRULED.

2 **THE WITNESS:** YES.

3 **THE COURT:** WHAT WAS THE DATE YOU GAVE,
4 MR. KENNEDY?

5 **MR. KENNEDY:** I DON'T BELIEVE I GAVE A DATE. I WAS
6 ABOUT TO ESTABLISH THAT.

7 **THE COURT:** YOU SAID, DO YOU RECALL IN 2016.

8 **MR. KENNEDY:** YES. I GAVE A YEAR. MAY I APPROACH
9 AND GET THE OTHER BINDER?

10 **THE COURT:** YES.

11 **BY MR. KENNEDY:**

12 **Q** PLEASE TURN TO EXHIBIT E. AND YOU SHOULD BE
13 LOOKING AT A LETTER DATED SEPTEMBER 13, 2016. DO YOU SEE
14 THAT?

15 **A** YES.

16 **Q** IS IT ADDRESSED TO YOU CURT OLSON?

17 **A** YES.

18 **Q** WHAT IS THE SUBJECT AS LISTED UNDER THE
19 ADDRESS?

20 **MR. KANANI:** OBJECTION. BEYOND THE SCOPE.

21 **THE COURT:** SUSTAINED. IT'S ALSO IMPROPER TO READ
22 FROM A DOCUMENT. IS THIS ONE IN EVIDENCE?

23 **MR. KENNEDY:** NOT YET, YOUR HONOR.

24 **THE COURT:** YOU CAN'T READ FROM IT IF IT'S NOT IN
25 EVIDENCE.

26 **BY MR. KENNEDY:**

27 **Q** DID YOU RECEIVE THIS LETTER, MR. OLSON?

28 **A** YES.

1 **Q** DO YOU RECALL RECEIVING IT ON SEPTEMBER --
2 ON OR ABOUT SEPTEMBER 13, 2016?

3 **A** I HAVE TO ASSUME I GOT IT AROUND THEN
4 DEPENDING IF I WAS IN MY OFFICE THAT DAY OR SOMEWHERE
5 AROUND THERE I GOT IT.

6 **MR. KENNEDY:** YOUR HONOR, WE MOVE THIS -- REQUEST
7 THAT EXHIBIT E BE ADMITTED INTO EVIDENCE.

8 **THE COURT:** ANY OBJECTION TO LETTER E?

9 **MR. KANANI:** OBJECTION. BEYOND THE SCOPE. LACKS
10 FOUNDATION. RELEVANCE.

11 **MR. KENNEDY:** I APOLOGIZE. THIS --

12 **THE COURT:** LETTER E IS ALREADY IN. I'M SORRY.

13 **MR. KENNEDY:** THAT IS WHY I WAS READING FROM IT.

14 **THE COURT:** YOU MAY GO BACK TO THAT QUESTION IF YOU
15 LIKE. IT IS MY ERROR. E IS IN EVIDENCE.

16 **MR. KENNEDY:** THANK YOU, YOUR HONOR.

17 **Q** SO I ASKED YOU, MR. OLSON, TO READ THE
18 SUBJECT OF THE LETTER LISTED UNDER THE ADDRESS.

19 **MR. KANANI:** MY OBJECTION WAS BASED ON RELEVANCE.

20 **THE COURT:** OVERRULED. IT'S IN EVIDENCE. THE
21 QUESTION -- ADMISSIBILITY PRESUMES THAT IT'S RELEVANT OR
22 HAS SOME RELEVANCE OR TENDENCY TO PROVE. THE WEIGHT I
23 GIVE IT REMAINS TO BE SEEN.

24 **MR. KANANI:** THANK YOU.

25 **THE WITNESS:** I'M SORRY.

26 **THE COURT:** WHAT WAS THE SUBJECT?

27 **BY MR. KENNEDY:**

28 **Q** THE SUBJECT.

1 **A** HOUSING DISCRIMINATION COMPLAINT, [REDACTED]
2 VERSUS [REDACTED] HOMEOWNER'S ASSOCIATION, ET AL.,
3 TITLE EIGHT, CASE NUMBER [REDACTED]-[REDACTED]-[REDACTED].

4 **Q** IT SAYS, "DEAR CURT OLSON," THE SECOND
5 SENTENCE OF THE FIRST PARAGRAPH, "YOU HAVE BEEN NAMED AS
6 A RESPONDENT IN THIS COMPLAINT." DO YOU SEE THAT?

7 **A** YES, I DO.

8 **Q** PLEASE TURN IN THE EXHIBIT TO THE PAGE
9 MARKED 0004. ARE YOU THERE?

10 **A** YES.

11 **Q** PARAGRAPH EIGHT?

12 **A** YES.

13 **Q** WHICH READS, THE SECOND PARAGRAPH WITHIN
14 PARAGRAPH EIGHT (READING):

15 COMPLAINANT ALLEGES DISCRIMINATION BASED
16 ON SEX AND GENDER. COMPLAINANT ALLEGES
17 RESPONDENT OLSON HAS SUBJECTED HER TO UNWANTED
18 SEXUAL COMMENTS AND TOUCHING. COMPLAINANT
19 ALLEGES THAT RESPONDENT OLSON HAS STALKED HER.
20 RESPONDENT OLSON HAS USED HIS POSITION AS A
21 BOARD PRESIDENT TO DIRECT A MAINTENANCE MAN TO
22 INSTALL CAMERAS IN COMPLAINANT'S UNIT.
23 RESPONDENT OLSON HAS TAKEN PICTURES OF
24 COMPLAINANT WHILE SHE WAS IN THE BATHROOM AND IN
25 HER BEDROOM. COMPLAINANT ALLEGES THAT BECAUSE
26 SHE HAS REFUSED TO HAVE SEX WITH RESPONDENT
27 OLSON, HE WILL NOT ALLOW HER TO USE THE STORAGE
28 UNIT WHICH IS IN HER BASEMENT. RESPONDENT ALSO

COPYING RESTRICTED PURSUANT TO GOV'T CODE SECTION 69954(D)

1 INFORMED COMPLAINANT THAT BECAUSE SHE REFUSED TO
2 HAVE SEX WITH HIM, THE HOA VOTED THAT
3 COMPLAINANT WILL NO LONGER BE ALLOWED TO HAVE
4 SHORT-TERM ROOMMATES IN HER UNIT.

5 DO YOU SEE WHERE I'M AT?

6 **A** YES.

7 **Q** ARE THESE THE SAME ALLEGATIONS THAT WERE
8 RESOLVED IN CONNECTION WITH THE 2015 RESTRAINING ORDER
9 APPLICATION?

10 **MR. KANANI:** OBJECTION. BEYOND THE SCOPE.

11 **THE COURT:** REALLY CALLS FOR A LEGAL CONCLUSION.
12 I'M NOT SURE IT'S EVEN RELEVANT HERE. TO THE EXTENT THAT
13 THESE ARE ALLEGATIONS MADE IN SOME OTHER PENDING ACTION
14 AND MAKE UP SOME BASIS FOR THE CONFLICT BETWEEN
15 MS. [REDACTED] AND MR. OLSON, I GET THAT. I UNDERSTAND
16 THAT. THAT GOES TO MY ADMONITION IN THE BEGINNING. HOW
17 THOSE ARE RESOLVED OR WHETHER THEY'RE RESOLVED, REALLY
18 THE ONLY ONE THAT MATTERS IS THE CIVIL HARASSMENT.

19 **BY MR. KENNEDY:**

20 **Q** ARE ANY OF THESE ALLEGATIONS IN THE
21 PARAGRAPH THAT I READ TRUE?

22 **MR. KANANI:** SAME OBJECTION.

23 **THE WITNESS:** NO. THEY ARE ABSOLUTELY ABSURD.

24 **THE COURT:** I WILL ALLOW THE ANSWER TO STAND. I'LL
25 DETERMINE HOW MUCH WEIGHT TO GIVE IT.

26 **THE WITNESS:** I'M SORRY.

27 **THE COURT:** I WILL ALLOW YOUR ANSWER TO STAND. I
28 WILL DETERMINE HOW MUCH WEIGHT, IF ANY, TO GIVE IT.

1 **THE WITNESS:** THANK YOU.

2 **BY MR. KENNEDY:**

3 **Q** TURN TO EXHIBIT G WHICH HAS ALSO BEEN
4 ADMITTED INTO EVIDENCE.

5 AND I APOLOGIZE. I NEED TO GO BACK TO
6 EXHIBIT E FOR JUST A MOMENT.

7 **THE COURT:** LET'S STOP HERE AND MARK YOUR PLACE,
8 AND WE'LL COME BACK AFTER OUR AFTERNOON TEN-MINUTE BREAK.

9

10 (A BRIEF RECESS WAS TAKEN.)

11

12 **THE COURT:** BACK ON THE RECORD.

13 RESUME THE QUESTIONS.

14 **BY MR. KENNEDY:**

15 **Q** BEFORE THE BREAK WE WERE LOOKING AT
16 EXHIBIT E. DO YOU HAVE THAT IN FRONT OF YOU, MR. OLSON?

17 **A** YES.

18 **Q** I'D LIKE TO LOOK AT THE FIRST SENTENCE OF
19 THE SECOND PARAGRAPH WHICH SAYS, "HUD HAS REFERRED THIS
20 COMPLAINT TO THE CALIFORNIA DEPARTMENT OF FAIR EMPLOYMENT
21 AND HOUSING FOR INVESTIGATION AS REQUIRED BY THE ACT." I
22 WON'T READ THE WORD -- THE MEMBERS. DO YOU SEE THAT?

23 **A** YES.

24 **Q** THEN TURNING TO EXHIBIT G. THIS ALSO HAS
25 BEEN PREVIOUSLY ADMITTED INTO EVIDENCE. JUST WANTED TO
26 READ THE FIRST PARAGRAPH OF THE BODY OF THE LETTER.

27 (READING):

28 THE DEPARTMENT OF FAIR EMPLOYMENT AND

1 HOUSING HAS CLOSED YOUR CASE FOR THE FOLLOWING
2 REASON: INVESTIGATED AND DISMISSED FOR, HYPHEN,
3 INSUFFICIENT EVIDENCE.

4 DO YOU SEE THAT?

5 **A** YES, I DO.

6 **MR. KENNEDY:** NO FURTHER QUESTIONS.

7 **THE COURT:** CROSS-EXAMINATION.

8 **MR. KANANI:** NO QUESTIONS, YOUR HONOR.

9 **THE COURT:** GO AHEAD AND BE SEATED BACK AT THE
10 TABLE NEXT TO YOUR ATTORNEY. THANK YOU.

11 YOUR NEXT REBUTTAL WITNESS.

12 **MR. KENNEDY:** NO MORE WITNESSES.

13 **THE COURT:** YOU REST?

14 **MR. KENNEDY:** YES, SIR.

15 **THE COURT:** BOTH PARTIES HAVE RESTED. THAT MEANS
16 THEY'VE PRESENTED ALL THEIR EVIDENCE AND THEN THEY'RE
17 GOING TO ARGUE.

18 SO LET ME ASK YOU, MR. KANANI, HOW LONG WILL
19 YOUR ARGUMENT BE? I SHOULD SAY THIS, EACH SIDE -- SINCE
20 EACH SIDE IS A PETITIONER ON THEIR RESPECTIVE RESTRAINING
21 ORDERS, EACH ATTORNEY WILL HAVE TWO CHANCES TO ARGUE
22 BEFORE THE COURT. OPENING, OPENING, RESPONSE, RESPONSE.

23 SO HOW LONG DO YOU THINK YOU'LL NEED TO
24 ARGUE?

25 **MR. KANANI:** IF MR. KENNEDY STIPULATES, I'M WILLING
26 TO SIMPLY GIVE BOTH ATTORNEYS ONE SHOT, AND I ESTIMATE I
27 COULD DO BOTH IN FIVE TO TEN MINUTES AT MOST.

28 **THE COURT:** MR. KENNEDY.

1 **MR. KENNEDY:** WE ARE WILLING TO STIPULATE TO THE
2 ONE SHOT CONCEPT, YOUR HONOR. BUT OUR CLOSING IS LONGER
3 THAN THAT.

4 **THE COURT:** HOW LONG?

5 **MR. KENNEDY:** EXPECT IT ABOUT A HALF AN HOUR TO
6 45 MINUTES.

7 **THE COURT:** PROBABLY NOT FAIR TO HAVE IT ALL BROKEN
8 UP. WE'RE OPEN EXCEPT FOR 1:30 COURTCALL, ABOUT A HALF
9 HOUR COURTCALL. WE SHOULD BE WELL DONE BY 1:30.

10 **MR. KENNEDY:** AGREE, YOUR HONOR.

11 **THE COURT:** SO WE CAN RESUME AND FINISH AND HAVE
12 THE ARGUMENTS ALL IN. THAT GIVES YOU BOTH A CHANCE TO
13 SUMMARIZE AND PREPARE AND TALK ABOUT THAT. SO WE'LL END
14 EARLY TODAY AND START THE ARGUMENTS AT 8:30 ON MONDAY.
15 IT WILL BE -- YOU STILL HAVE THE RIGHT TO DO TWICE IF YOU
16 WANT. IF YOU WANT TO COME BACK AND TELL ME ON MONDAY
17 YOU'LL EACH DO ONE ARGUMENT, THAT IS FINE, TOO. BUT
18 WE'LL DO IT IN THAT SAME ORDER. MR. KANANI AND THEN
19 MR. KENNEDY.

20 **MR. KANANI:** ONLY CLOSING ARGUMENTS.

21 **THE COURT:** CORRECT. THANK YOU. SEE YOU MONDAY.

22
23 (AT 3:39 P.M., THE PROCEEDINGS WERE
24 ADJOURNED UNTIL MONDAY, NOVEMBER 19,
25 2018, AT 8:30 A.M.)
26
27
28

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA

2 FOR THE COUNTY OF LOS ANGELES

3 DEPARTMENT NWD

HON. MICHAEL J. CONVEY, JUDGE

4 [REDACTED], AN INDIVIDUAL,)

5 PETITIONER,)

6 VS.)

CASE NO.

7 CURTIS OLSON, AN INDIVIDUAL,)

8 RESPONDENT.)

R/T [REDACTED]

9 _____)
10 AND RELATED ACTIONS.)

11 REPORTER'S TRANSCRIPT OF PROCEEDINGS

12 11/19/18

13
14
15 APPEARANCES:

16 FOR PETITIONER/
17 RESPONDENT

BENJAMIN F. KANANI, ESQ.
8730 WILSHIRE BOULEVARD
SUITE 411
BEVERLY HILLS, CALIFORNIA 90211

18
19 FOR RESPONDENT/
20 PETITIONER
21 OLSON:

BUCHALTER
ERIC M. KENNEDY, ESQ.
1000 WILSHIRE BOULEVARD
SUITE 1500
LOS ANGELES, CALIFORNIA 90017

22 RYAN A. VOGT-LOWELL, ESQ.
23 1 MACARTHUR PLACE
24 SUITE 300
25 SANTA ANA, CALIFORNIA 92707

26
27
28 REPORTED BY:

MARLENE BURRIS, RPR, CSR #8424
OFFICIAL REPORTER

1 CASE NUMBER: [REDACTED] R/T [REDACTED]
2 CASE NAME: [REDACTED] V. OLSON
3 VAN NUYS, CALIFORNIA 11/19/18
4 DEPARTMENT NO. NWD HON. MICHAEL J. CONVEY, JUDGE
5 REPORTER: MARLENE BURRIS, CSR NO. 8424
6 TIME: 8:30 A.M.

7

8 APPEARANCES:

9 (AS HERETOFORE NOTED.)

10

11

12 **THE COURT:** [REDACTED] AND OLSON. BOTH PARTIES ARE
13 PRESENT. COUNSEL FOR BOTH PARTIES ARE PRESENT. AND WE
14 RESUME THIS MORNING WITH THE CLOSING ARGUMENTS. STARTING
15 WITH -- DO YOU STILL WANT TO DO ONE EACH OR TWO?

16 **MR. KANANI:** WE AGREED ON ONE EACH.

17 **THE COURT:** OKAY. STARTING WITH MS. [REDACTED]'S
18 COUNSEL, MR. KANANI, YOUR TURN FOR CLOSING ARGUMENT
19 FIRST.

20

21

CLOSING ARGUMENT

22

23 **MR. KANANI:** THANK YOU VERY MUCH, YOUR HONOR.

24 AND IF IT PLEASE THE COURT, THE HISTORY
25 BETWEEN MS. [REDACTED] AND MR. OLSON GOES BACK A LONG WAY,
26 AND MOST OF IT FOR THIS PROCEEDING IS NOT RELEVANT.
27 HOWEVER, MS. [REDACTED] FEELS THAT THE PRESSING ISSUE AND
28 THE MAIN ISSUE BEFORE THIS COURT COMES DOWN TO A VERY

1 SIMPLE QUESTION. IS THE HARASSMENT AND THE CONDUCT
2 MS. ██████████ HAS CITED LINKED AND RELATED TO THE
3 RESPONDENT OR NOT. IN OTHER WORDS, IS MR. OLSON THE MAN
4 BEHIND ALL OF THIS?

5 BOTH PARTIES WILL PRESENT COMPETING
6 STORYLINES. HOWEVER, WE BELIEVE THAT MS. ██████████ HAS
7 SHOWN THREE THINGS CLEARLY AND EASILY BY A PREPONDERANCE
8 OF THE EVIDENCE. FIRST, THERE WAS HARASSMENT. THIS
9 RESTS LARGELY ON UNDISPUTED FACTS.

10 SECOND, THE HARASSMENT RISES TO THE LEVEL OF
11 DANGER AND GRAVITY THAT IT WARRANTS JUDICIAL
12 INTERVENTION, THAT IT DOES REQUIRE A RESTRAINING ORDER
13 THAT WOULD BENEFIT HER AND PARTIES AROUND HER.

14 AND, THIRD -- AND THIS IS WHAT WE BELIEVE TO
15 BE THE HEART OF THE ISSUE FACING THE COURT TODAY -- THERE
16 IS PLENTY OF EVIDENCE TO DEMONSTRATE THAT THE CONDUCT
17 MS. ██████████ AND THE WITNESSES HAVE TESTIFIED TO IS
18 RELATED AND LINKED TO RESPONDENT. AND THROUGHOUT THIS
19 CLOSING, MS. ██████████ 'S COUNSEL WILL DEMONSTRATE THAT TO
20 THE COURT VERY CLEARLY.

21 THE FIRST TWO PARTS OF THAT STATEMENT WE
22 BELIEVE ARE FAIRLY SIMPLE FOR THE COURT TO CONCLUDE.
23 THERE IS A WIDE ARRAY OF UNDISPUTED FACTS AND EVIDENCE
24 THAT DEMONSTRATES THERE WAS HARASSMENT THAT OCCURRED.
25 MR. FOTSO TESTIFIED THAT INDIVIDUALS WERE RUMMAGING
26 AROUND THROUGH HIS BELONGINGS AND MS. ██████████ 'S WHILE HE
27 WAS LIVING AT MS. ██████████ 'S UNIT. SOMETHING HE SAW
28 PERSONALLY AND WHICH WAS CORROBORATED BY THE VIDEO

1 SURVEILLANCE FOOTAGE PROVIDED TO THIS COURT IN THIS
2 HEARING.

3 IN ADDITION, THE TESTIMONY OF MIKE ROTH,
4 MS. ██████████'S PERSONAL HANDYMAN DEMONSTRATED THAT VERY
5 LIKELY THERE WAS AN ATTEMPTED BREAK-IN OR AT LEAST SOME
6 INDIVIDUAL WHO WAS DOING SOMETHING INAPPROPRIATE TO
7 MS. ██████████'S UNIT, TO THE WINDOW AROUND IT IN WHICH AN
8 INDIVIDUAL COULD GAIN ENTRANCE WITHOUT MUCH DIFFICULTY.

9 THIRD, THERE WERE A NUMBER OF PEOPLE
10 PHOTOGRAPHING MS. ██████████ BOTH UP CLOSE AND FROM A
11 DISTANCE AND THIS HAPPENED ON SEVERAL OCCASIONS.
12 MR. FOTSO EVEN SAW SOME OF THESE MEN OUTSIDE OF ██████████
13 ██████████ AND INDEPENDENTLY OF MS. ██████████ WITHOUT
14 MS. ██████████ TELLING HIM ABOUT THESE INCIDENCES, HE
15 NOTICED THEM ON HIS OWN AND BROUGHT IT TO HER ATTENTION.

16 ON TOP OF THAT, THERE WAS AN ADDITIONAL
17 RENTER WHO WAS TEMPORARILY STAYING IN MS. ██████████'S UNIT
18 AND HE NOT ONLY WENT THROUGH MR. FOTSO'S BELONGINGS BUT
19 CONTINUALLY ASKED FOR THE WHEREABOUTS OF MS. ██████████
20 EVEN AFTER SHE HAD GIVEN A FAKE NAME.

21 AND FINALLY THERE WAS MR. MIRAMONTES WHO
22 TESTIFIED THAT MR. OLSON BECAME VERY ANGRY AND AGGRESSIVE
23 TOWARDS HIM AND MS. ██████████ WHEN ALL HE WAS DOING WAS
24 PREPARING MS. ██████████'S TAXES UNDER THE GUISE OF
25 FRUSTRATION AND ANGER THAT HE MIGHT BE SOME SHORT-TERM
26 RENTER.

27 EVEN IF THERE WERE DISPUTES REGARDING
28 MS. ██████████'S SHORT-TERM RENTALS AT HER UNIT, EVEN IF

1 THERE WERE 100 OTHER DISPUTES BETWEEN THE HOA AND
2 MS. [REDACTED], THE COURT NEED NOT AND SHOULD NOT DECIDE
3 WHO IS CORRECT IN THAT DISPUTE. BUT MR. OLSON HAD OTHER
4 REMEDIES. HE WAS GOING THROUGH THE PROCESS OF THE BOARD
5 AT [REDACTED] THE PARTIES DO HAVE DISPUTES BOTH IN
6 CIVIL COURT AND WITH THE CALIFORNIA DEPARTMENT OF FAIR
7 EMPLOYMENT AND HOUSING. THERE WAS NO NEED FOR HIM TO
8 NECESSARILY MAKE THAT AGGRESSION, AND WE BELIEVE IT LENDS
9 TO THE EVIDENCE, IN FACT, THAT THERE WAS HARASSMENT. ON
10 THAT POINT, WE FEEL THE PARTIES GENERALLY AGREE.

11 SECOND, WITHOUT SPENDING TOO MUCH TIME
12 ARGUING THE STANDARD, GIVEN THAT THE COURT'S DISCRETION
13 AND EXPERIENCE FAR OUTWEIGHS ANY OF THE COUNSEL PRESENT,
14 WE BELIEVE THAT IF EVEN HALF OF THE FACTS WHICH I JUST
15 STATED ARE TRUE, IT RISES TO THE LEVEL OF CONDUCT THAT
16 WARRANTS A RESTRAINING ORDER.

17 MR. KILLIAN ALSO TESTIFIED, THOUGH MR. OLSON
18 DISPUTES THIS, THAT HE RECEIVED A REPORT OF MR. OLSON
19 HIMSELF ACTUALLY LOOKING INTO MS. [REDACTED]'S UNIT AFTER
20 2015. WITHIN 2016 SEVERAL MONTHS AFTER THEY HAD REACHED
21 A CONCILIATION AGREEMENT, THERE WERE STILL DISPUTES,
22 STILL PROBLEMS GOING ON, NOT TO MENTION THE RUMORS THAT
23 MS. [REDACTED] HAS TRIED TO PROVE TODAY REGARDING REPORTS
24 THAT SHE AT ONE TIME WORKED AS A PROSTITUTE OR A
25 CON ARTIST.

26 MOST IMPORTANTLY, HOWEVER, JUST BECAUSE
27 THERE IS HARASSMENT AND THE HARASSMENT IS SERIOUS THAT
28 DOES NOT AUTOMATICALLY MEAN THAT MR. OLSON IS

1 RESPONSIBLE. AND MS. ██████████ DID TESTIFY THAT SHE DID
2 NOT PERSONALLY, EXCEPT FOR THE INCIDENT OF PEEPING, WHICH
3 MR. KILLIAN CORROBORATED, MS. ██████████ TESTIFIED THAT SHE
4 DID NOT PERSONALLY SEE MR. OLSON HIRE ANY MEN IN BLACK OR
5 INDIVIDUALS PHOTOGRAPHING HER AND SHE DID NOT SEE
6 MR. OLSON PHOTOGRAPH HER DIRECTLY.

7 HOWEVER, A BRIEF REVIEW OF THE EVIDENCE WE
8 BELIEVE STILL PRESENTS EASILY BY A PREPONDERANCE.
9 PERHAPS IF WE WERE IN A CRIMINAL PROCEEDING, REASONABLE
10 DOUBT MIGHT BE A MUCH MORE DIFFICULT STANDARD TO MEET.
11 BUT IN THIS COURT ON THE NARROW ISSUES BEFORE YOUR HONOR,
12 BY A PREPONDERANCE OF THE EVIDENCE, WE FEEL THAT
13 MS. ██████████ HAS EASILY MET HER BURDEN TO DEMONSTRATE THE
14 LINK TO MR. OLSON IN SEVERAL WAYS WHICH I WILL GO THREW
15 BRIEFLY NOW.

16 FIRST MR. FOTSO SAW PEOPLE GOING THROUGH HIS
17 BELONGINGS, MS. ██████████'S BELONGINGS, AND BELIEVES THAT
18 HE MIGHT BE EVEN FOLLOWED NOW. SECOND, MR. OLSON DESPITE
19 STATING ON THE STAND THAT HE NO LONGER SPENDS TIME AT
20 ██████████ AND THAT HE INTENDS TO MOVE ON SAYING,
21 "IT WAS A GOOD RUN" IS STILL ASKING FOR A SIGNIFICANT
22 INCREASE IN SECURITY AT ██████████ JUST AS
23 RECENTLY AS MAYBE A MONTH AGO IN OCTOBER OF THIS YEAR, HE
24 REQUESTED, AS MS. ██████████ TESTIFIED, THAT THERE BE 24/7
25 SECURITY AND THAT ALL IDENTIFICATION BE CHECKED UPON
26 COMING TO ██████████ WE FEEL THIS IS INCONSISTENT
27 WITH AN INDIVIDUAL WHO NO LONGER HAS AN INTEREST IN
28 STAYING THERE AND WHEN MULTIPLE INDIVIDUALS HAVE ALREADY

1 STATED THERE'S NO ONE THERE. MOST PEOPLE DON'T SPEND
2 MUCH TIME THERE OR THEY HAVE SIMPLY LEFT DUE TO THE
3 PROBLEMS THAT THEY FEEL PERSIST.

4 THIRD, MR. OLSON CLAIMED ON THE STAND THAT
5 HE AT NO POINT HAS SEEN THE SURVEILLANCE FOOTAGE FROM
6 [REDACTED] AND YET MS. [REDACTED] TESTIFIED THAT IN
7 A PREVIOUS MATTER IN A SEPARATE CONVERSATION, COUNSEL
8 REPRESENTING MR. OLSON VERIFIED TO MS. [REDACTED] THAT HE
9 KNEW SHE HAD BEEN SERVED BASED ON WHAT HE HAD SEEN ON THE
10 SURVEILLANCE FOOTAGE AT [REDACTED] THE VERY FOOTAGE
11 THAT MR. OLSON CLAIMS HE DID NOT ACCESS AND HAS NEVER
12 SEEN.

13 IN ADDITION, CORROBORATING THIS SIMPLE
14 STATEMENT BY HIS COUNSEL, MR. OLSON WAS A PRESIDENT OF
15 THE BOARD AND WAS A BOARD MEMBER FOR A NUMBER OF YEARS.
16 HE ALSO TESTIFIED THAT AT ONE POINT HE OWNED ALL OF THE
17 UNITS AT [REDACTED] AND THAT WE BELIEVE TAKEN
18 TOGETHER, HE EASILY COULD ACCESS THE SURVEILLANCE FOOTAGE
19 WHICH COULD GIVE HIM SIGNIFICANT INFORMATION ON
20 MS. [REDACTED]'S WHEREABOUTS.

21 FOURTH, THE PHOTOGRAPHY AND THE SURVEILLANCE
22 THAT MS. [REDACTED] NOTICED WHICH PRECIPITATED A SECOND
23 FILING OF A REQUEST FOR A RESTRAINING ORDER BEGAN
24 GENERALLY IN MAY OF 2017. ALTHOUGH THE CIVIL MATTER IS
25 NOT AT ISSUE HERE, WE BELIEVE THE TIMING IS RELEVANT AND
26 MAKES A BIG STATEMENT. IT WAS IN MAY OF 2017 THAT
27 MR. OLSON FILED HIS CROSS-COMPLAINT TO MS. [REDACTED]'S
28 CIVIL ACTION AND SHORTLY THEREAFTER HE FILED AN EX PARTE

1 MOTION TO DISMISS MS. ██████████'S CLAIM AND THAT WAS
2 DENIED. THIS WAS IN MAY. OVER THE NEXT FEW MONTHS, THE
3 SURVEILLANCE INTENSIFIED AND IT WAS IN SEPTEMBER THAT
4 MS. ██████████ FILED A SECOND REQUEST FOR A CIVIL
5 HARASSMENT ORDER. WE FEEL THIS TIMING IS DIFFICULT TO
6 IGNORE AND LENDS FURTHER CREDENCE TO HER STORYLINE OF
7 EVIDENCE.

8 FIFTH, ALTHOUGH MR. MORENO WAS NOT HERE TO
9 TESTIFY PERSONALLY, HE DID SUBMIT MULTIPLE DECLARATIONS
10 AND HE DID POSITIVELY IDENTIFY MR. OLSON WITH THE
11 INDIVIDUALS WHO WERE SURVEILLING AND PHOTOGRAPHING
12 MS. ██████████. HE SAW THEM IN THE CAFE. HE POINTED THEM
13 OUT DIRECTLY TO MS. ██████████. AND HE SAID THAT IT
14 HAPPENED ON MORE THAN ONE OCCASION.

15 ADDITIONALLY SUSPECT IS THE FACT THAT EVEN
16 THOUGH HE KNEW MS. ██████████ FOR SEVERAL YEARS, WAS
17 INVOLVED WITH HER PERSONAL WORK, HELD A JOB FOR OVER A
18 DECADE, AND FILED THREE DECLARATIONS ON HER BEHALF, HE
19 NONETHELESS CANNOT BE FOUND SINCE I BELIEVE LATE APRIL OR
20 EARLY MARCH OF THIS YEAR SHORTLY AFTER THE ORIGINAL TRIAL
21 DATE ON APRIL 30TH. WE'VE HAD NO CONTACT WITH HIM
22 DESPITE A LONGSTANDING RELATIONSHIP, AND HE HAS NOT
23 RETURNED TO WORK AFTER WORKING THERE --

24 **MR. KENNEDY:** OBJECTION. THESE FACTS ARE NOT IN
25 EVIDENCE.

26 **THE COURT:** OVERRULED. THERE WAS TESTIMONY THAT HE
27 DOES NOT WORK THERE ANYMORE.

28 **MR. KANANI:** MS. ██████████ HAS NO OTHER ENEMIES OR

1 ONGOING DISPUTES. THE ONLY COMMON LINK TO ALL OF THE
2 ODD, DISTURBING, AND UNSAFE BEHAVIOR THAT SHE'S MENTIONED
3 IS MR. OLSON. THERE IS NO ONE SHE CAN THINK OF WITH WHOM
4 SHE HAS ANY MAJOR DISAGREEMENT OR WOULD HAVE ANY OTHER
5 MOTIVE IN ORDER TO PUSH HER OUT OF HER HOME OR HARASS HER
6 IN THE WAY THAT SHE'S DESCRIBED.

7 FINALLY, WHAT WE BELIEVE TO BE THE MOST
8 COMPELLING AND IMPORTANT EVIDENCE THAT WE CANNOT EXPLAIN
9 ANY OTHER WAY IS THE VERY OPPORTUNE STOPPING AND STARTING
10 OF THE VIDEO SURVEILLANCE FOOTAGE OBTAINED FROM ██████████
11 ██████████ IT TOOK MS. ██████████ THREE TO FOUR HEARINGS
12 JUST TO OBTAIN THIS FOOTAGE AFTER ISSUING A VALID
13 SUBPOENA. AND YET AFTER SHE RECEIVED IT, EVEN THOUGH SHE
14 RECEIVED IT DIRECTLY FROM MR. SILVER, WHO IS RESPONSIBLE
15 FOR MAINTAINING AND INSTALLING THIS FOOTAGE, IT STILL HAS
16 MULTIPLE STOPS WHICH NO ONE CAN EXPLAIN. AND THESE STOPS
17 HAPPEN AT THE EXACT MOMENT THAT CERTAIN INDIVIDUALS ARE
18 SEEING RUMMAGING AROUND BEHIND HER UNIT AND THROUGH HER
19 BELONGINGS. IN ADDITION, MR. FOTSO'S TESTIMONY LINES UP
20 EXACTLY WITH WHEN THOSE INDIVIDUALS APPEAR AND WHAT THEY
21 SEEM TO BE DOING.

22 THE INDIVIDUALS ON THE SURVEILLANCE FOOTAGE
23 CAME OUT OF MR. OLSON'S UNIT. THIS IS UNDISPUTED. AND
24 YET NO ONE CAN REMEMBER WHICH ARCHITECTURAL FIRM THEY
25 WORKED WITH. MR. OLSON CANNOT REMEMBER WHO THEY WERE OR
26 WHAT THEIR NAMES WERE AND WHY EXACTLY THEY WERE THERE.

27 IN ADDITION, THE PEOPLE ON THE SURVEILLANCE
28 FOOTAGE IF THEY WERE LOOKING AT THE VACANT LOT FOR SOME

1 SORT OF DEVELOPMENT PROJECT OR POTENTIAL BUILDING OR
2 CONSTRUCTION CONVENIENTLY WALK ONTO THE BACK WALKWAY,
3 STOP AND MEANDER BEHIND MS. OLSON'S UNIT, AND NEVER
4 ACTUALLY GO ONTO THE VACANT LOT NOR DO THEY GO FURTHER
5 DOWN THE REST OF THE WALKWAY AND SPEND ANY TIME WALKING
6 AROUND MR. -- THE UNIT JUST BEHIND MS. [REDACTED]'S WHICH I
7 BELIEVE BELONGS TO MR. ECONN.

8 THE LAST POINT IS THE FACT THAT THESE
9 INDIVIDUALS AFTER COMING OUT OF MR. OLSON'S UNIT, BEING
10 THERE TO SURVEY LAND FOR WHAT WOULD BE A SIZABLE
11 CONSTRUCTION PROJECT, STAYED FOR MAYBE THREE TO FIVE
12 MINUTES, AND LEAVE EXACTLY WHEN MR. FOTSO ARRIVES. IF
13 THEY TRULY HAD NOTHING INAPPROPRIATE IN THEIR INTENTIONS
14 AND THEY HAD NO REASON TO LEAVE OR TO BE AFRAID OF
15 ANYTHING THAT THEY ARE DOING, WHY THEY COME EXACTLY WHEN
16 MR. FOTSO LEAVES AND LEAVE EXACTLY WHEN HE ARRIVES SEEMS
17 INCREDIBLY SUSPECT.

18 ALL OF THESE ITEMS TAKEN TOGETHER WE BELIEVE
19 PROVIDE THE LINK NECESSARY TO PROVIDE THE COURT AMPLE
20 JUSTIFICATION TO GRANT MS. [REDACTED]'S REQUEST. THESE
21 LINKS MOSTLY ARE UNDISPUTED, AND WE FIND NO OTHER
22 REASONABLE EXPLANATION THAT COULD ANSWER WHY IT IS THAT
23 THEY ARE THERE. AND NO DOUBT THAT OPPOSING COUNSEL WOULD
24 PROVIDE A COGENT, WELL-REASONED ARGUMENT WHY MR. OLSON IS
25 NOT RESPONSIBLE. BUT THE LACK OF DIRECT TESTIMONY OR
26 LACK OF DIRECT EVIDENCE FROM MR. OLSON HIRING SOMEONE OR
27 ORDERING THEM TO HARASS MS. [REDACTED] DOES NOT NECESSARILY
28 MEAN BY A PREPONDERANCE OF THE EVIDENCE THAT HE DID NOT

1 DO WHAT IS SUGGESTED.

2 ULTIMATELY WE CANNOT SEE ANY OTHER WAY IN
3 ORDER TO BRING THIS ISSUE TO A CLOSE AND WE BELIEVE THAT
4 MS. ██████████ HAS DONE EVERYTHING SHE NEED TO IN ORDER TO
5 PROVIDE THE COURT WITH WHAT IT NEEDS TO GRANT HER
6 REQUEST. BUT UNDERLYING EVERYTHING, ONE FINAL REASON WHY
7 I BELIEVE MS. ██████████ 'S REQUEST SHOULD BE GRANTED IS
8 VERY SIMPLE. IT CREATES PEACE. THE CONFLICT RUNNING
9 BETWEEN MS. ██████████ AND MR. OLSON HAS BEEN GOING ON FOR
10 SEVERAL YEARS, AND I BELIEVE BOTH -- I AND EVEN
11 MR. KENNEDY HAVE COME IN ON PARTS OF IT. BUT ONE THING
12 THAT I BELIEVE BOTH SIDES AGREE ON IS THAT THE TEMPORARY
13 RESTRAINING ORDER PUT INTO EFFECT IN SEPTEMBER OF LAST
14 YEAR HAS BEEN AT LEAST SOMEWHAT EFFECTIVE. THE PARTIES
15 ARE NO LONGER IN CONTACT WITH EACH OTHER. THE
16 SURVEILLANCE HAS STOPPED SHORTLY AFTER SEPTEMBER AND HAS
17 NOT STARTED AGAIN AT LEAST TO MS. ██████████. AND THERE'S
18 A GREAT CONCERN THAT, IF MS. ██████████ 'S REQUEST FOR A
19 CIVIL HARASSMENT RESTRAINING ORDER FAILS, THAT MORE
20 ACTIVITY WILL INCREASE. THERE IS ALMOST NO DOWNSIDE TO
21 GRANTING THE REQUEST GIVEN THE PEACE IT HAS CREATED. AND
22 MR. KENNEDY'S ARGUMENT THAT THE RESTRAINING ORDER HAS
23 ALREADY ACCOMPLISHED WHAT IT WAS SUPPOSED TO, WE BELIEVE
24 ONLY LENDS FURTHER CREDENCE TO EXTEND IT.

25 IF SOME MEASURE OF PEACE AND CALM HAS BEEN
26 CREATED SINCE SEPTEMBER, WHATEVER THE COURT, EITHER THIS
27 COURT OR ANOTHER JUDICIAL OFFICER, HAS DONE TO CREATE
28 THAT SHOULD CONTINUE. SHOULD CONTINUE FOR AS LONG AS

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1 POSSIBLE.

2 ALL OF THE OTHER DISPUTES THROUGH THE
3 HOMEOWNER'S ASSOCIATION REGARDING RENTERS AND REGARDING
4 DISCRIMINATION ARE NOT BEFORE THIS COURT AND WILL BE
5 ADDRESSED THROUGH THE NORMAL COURSE OF THE LEGAL PROCESS.
6 BOTH PARTIES HAVE BEEN LITIGATING FOR YEARS IN SEVERAL
7 OTHER MATTERS, AND THEY WILL CONTINUE TO DO SO WITHOUT
8 ISSUE. BUT THIS RESTRAINING ORDER HAS HAD AN IMMEDIATE
9 EFFECT TO INCREASE THE PEACE AT [REDACTED] PROVIDE
10 SAFETY TO MS. [REDACTED], AND GENERALLY TONE DOWN THE LEVEL
11 OF CONFLICT BETWEEN THE PARTIES.

12 WE FEEL THAT IT'S SOMETHING THAT IS VERY
13 MUCH IN LINE WITH THE CODES INTENTION, VERY MUCH IN LINE
14 WITH WHAT THIS COURT AIMS TO DO, AND IS ULTIMATELY
15 LAUDABLE THAT SHOULD BE PRESERVED FOR AS LONG AS
16 POSSIBLE.

17 FINALLY, IN DEFENSE OF MR. OLSON'S REQUEST
18 FOR A CIVIL HARASSMENT RESTRAINING ORDER AGAINST
19 MS. [REDACTED] AND SIMULTANEOUSLY AS AN ARGUMENT SPEAKING
20 TO MR. OLSON'S CREDIBILITY, MS. [REDACTED] BELIEVES THAT
21 MR. OLSON'S CLAIMS FOR A CIVIL HARASSMENT RESTRAINING
22 ORDER ARE SO UNFOUNDED AND SO BELOW THE LEVEL OF CONDUCT
23 THAT WARRANTS A RESTRAINING ORDER THAT MS. [REDACTED] MAKES
24 NO FURTHER ARGUMENT ON THAT ISSUE AT THIS TIME EXCEPT TO
25 REFER THE COURT TO RESPONDENT'S EXHIBIT GG, THE VIDEO
26 FOOTAGE TAKEN BY MR. OLSON ON HIS CELL PHONE THAT
27 DEMONSTRATES THERE WAS NO HARASSMENT. AND ALMOST NO
28 INDIVIDUAL COULD GENUINELY STATE THAT THEY WERE IN FEAR

1 FOR THEIR LIFE BASED ON THE EVENTS THAT OCCURRED ON THAT
2 VIDEO.

3 WITH THAT, MS. [REDACTED] RESTS HER CASE AND
4 THANKS THE COURT FOR ITS TIME.

5 **THE COURT:** I HAVE ONE PROCEDURAL TIME QUESTION AND
6 I WILL ASK IT ON THE OTHER SIDE AS WELL BECAUSE I WAS NOT
7 SURE.

8 AT SOME TIME AFTER THESE TWO REQUESTS FOR
9 CIVIL HARASSMENT RESTRAINING ORDERS WERE FILED, DID
10 ANYONE ON EITHER SIDE FILE A DOCUMENT CALLED "NOTICE OF
11 RELATED CASES" IN AN EFFORT TO HAVE DEPARTMENT ONE RELATE
12 THESE TWO CIVIL HARASSMENT CASES TO THE PENDING CIVIL
13 MATTERS IN THE WEST DISTRICT I THINK?

14 **MR. KANANI:** I BELIEVE BOTH CIVIL HARASSMENT
15 RESTRAINING ORDERS WERE FILED IN THE WEST DISTRICT.

16 **THE COURT:** CORRECT. BUT WAS THERE EVER A SEPARATE
17 PLEADING TO BRING THIS TO THE ATTENTION OF DEPARTMENT ONE
18 TO DETERMINE WHETHER THESE CASES SHOULD ALL BE RELATED TO
19 EACH OTHER?

20 **MR. KANANI:** NOT TO MY KNOWLEDGE. THERE WERE TWO
21 SEPARATE CIVIL CASES WHICH I BELIEVE ARE WORKING TOWARDS
22 CONSOLIDATION, BUT I DON'T BELIEVE EITHER SIDE FILED
23 ANYTHING TO CONSOLIDATE THE CHRO MATTERS WITH THE CIVIL
24 MATTERS.

25 **THE COURT:** UNDERSTOOD. THAT WAS A PROCEDURAL
26 QUESTION THAT I HAD. THANK YOU.

27 MR. KENNEDY, YOUR CLOSING.

28 ///

CLOSING ARGUMENT

1
2
3 **MR. KENNEDY:** THANK YOU, YOUR HONOR. I WOULD LIKE
4 TO START BY THANKING THE COURT AND ITS STAFF FOR ITS
5 PROFESSIONAL AND COURTEOUS MANNER TO MANAGE THESE
6 PROCEEDINGS. IT'S BEEN A PLEASURE BEING IN THIS
7 COURTROOM.

8 IN MY OPENING STATEMENT, YOUR HONOR, I NOTED
9 THAT MS. ██████████ HAS MADE SERIOUS ALLEGATIONS AGAINST
10 MR. OLSON, PERVASIVE HARASSMENT FOR OVER THREE YEARS, AND
11 HAS YET NEVER PRODUCED A SINGLE PIECE OF EVIDENCE, NO
12 DOCUMENT, NO PHOTOGRAPH, NO VIDEO, NO WITNESSES
13 CORROBORATING HER CLAIMS AGAINST HIM FOR DIRECT
14 HARASSMENT.

15 AFTER THREE DAYS OF TRIAL, THAT FACT HAS NOT
16 CHANGED. MS. ██████████ BORE THE BURDEN OF SHOWING BY
17 CLEAR AND CONVINCING EVIDENCE THAT A RESTRAINING ORDER IS
18 NECESSARY TO ADDRESS A CREDIBLE THREAT OF CONTINUED
19 HARASSMENT AND SHE UTTERLY FAILED TO SATISFY THAT BURDEN.
20 AFTER CALLING 14 WITNESSES TO TESTIFY IN HER
21 CASE-IN-CHIEF, MS. ██████████ DID NOT PRODUCE A SINGLE
22 PIECE OF EVIDENCE INCLUDING HER OWN TESTIMONY CREDIBLY
23 SUPPORTING HER ALLEGATIONS. INDEED WE HEARD NO CREDIBLE
24 EVIDENCE AGAINST MR. OLSON AT ALL.

25 WE DID, HOWEVER, HEAR A LOT OF SPECULATION
26 BORDERING ON CONSPIRACY AND PARANOIA THAT MS. ██████████ IS
27 BEING STALKED, PHOTOGRAPHED, HARASSED BY A VAST NETWORK
28 OF CONFEDERATES ALL HIRED BY MR. OLSON TO, QUOTE, "GET

1 RID OF HER," END QUOTE.

2 HER WITNESSES SEEM TO SHARE IN HER PARANOIA.
3 FAR FROM REALITY, MS. ██████████'S VERSION OF EVENTS SOUND
4 MORE LIKE A MADE FOR T.V. DRAMA WHERE SHE HAS CAST
5 HERSELF AS THE DAMSEL IN DISTRESS CONTINUALLY TRYING TO
6 ESCAPE THE DESPERATE ATTENTION --

7 **THE COURT:** I'M GOING TO STOP YOU THERE. WE DON'T
8 USE WORDS LIKE "DAMSEL IN DISTRESS." THAT IS AN
9 INAPPROPRIATE ARGUMENT. YOU CAN MAKE THE ARGUMENT
10 WITHOUT LOADED VALUE LIKE THAT THAT MAY -- THAT ARE JUST
11 NOT APPROPRIATE IN COURT. YOU CAN REPHRASE THAT, AND I
12 DON'T CALL IT A "DAMSEL IN DISTRESS" CASE. WE DON'T DO
13 THAT IN ARGUMENT. LET'S REPHRASE THAT. LET'S RETHINK
14 THAT.

15 **MR. KENNEDY:** THANK YOU, YOUR HONOR.

16 CONTINUALLY TRYING TO ESCAPE THE DESPERATE
17 ATTENTION OF BASICALLY EVERYONE WHO'S EVER BEEN IN
18 PROXIMITY WITH HER.

19 ACCORDING TO MS. ██████████, SHE'S CONSTANTLY
20 BEING FOLLOWED, PHOTOGRAPHED, AND FILMED. AMONG HER MANY
21 HARASSERS, ALL OF WHOM WERE ALLEGEDLY HIRED BY MR. OLSON,
22 IS A HAIRDRESSER, A CHEF, A BUSBOY, VARIOUS UNIDENTIFIED
23 MEN IN BLACK, AN ARCHITECT, AN ENGINEER, A PREGNANT
24 WOMAN, A TOW TRUCK DRIVER, AN ESCAPE CONVICT, AN
25 ARSONIST, AND MAYBE MOST UNBELIEVABLY THE FORMER MAJOR
26 LEAGUE BASEBALL PLAYER LENNY DYKSTRA WHO SHE CLAIMS BROKE
27 INTO HER HOME AT MR. OLSON'S REQUEST AND STOLE CERTAIN
28 DOCUMENTS RELATED TO HER CASE.

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1 TOWARD THE END OF HER TESTIMONY WHEN IT
2 SEEMED THAT THE PLOT COULD GET NO MORE OUTLANDISH,
3 MS. ██████████, QUOTE, "JUST REMEMBERED" THAT IN ADDITION
4 TO EVERYTHING ELSE DIEN LE, DEFENSE COUNSEL IN THE CIVIL
5 CASES FILED BY MS. ██████████, THREATENED HER LIFE STATING
6 THAT, IF SHE DID NOT DISMISS HER CIVIL CASE AGAINST
7 MR. OLSON WHICH SEEKS MILLIONS IN DAMAGES, MR. OLSON
8 WOULD HURT HER OR RUN HER OVER WITH A CAR WHILE SHE WAS
9 WALKING HER DOG.

10 MR. LE, A LICENSED ATTORNEY FOR OVER 20
11 YEARS, WAS IN THE COURTROOM WHEN THIS ALLEGATION WAS MADE
12 AND WAS ALL TOO WILLING TO TAKE THE STAND AND
13 EMPHATICALLY CONFIRM THAT MS. ██████████'S ALLEGATIONS
14 AGAINST HIM WERE CATEGORICALLY FALSE. STATED SIMPLY,
15 MS. ██████████'S MYRIAD ALLEGATIONS ARE DEVOID OF ANY
16 CREDIBILITY.

17 ALTHOUGH MS. ██████████'S RESTRAINING ORDER
18 APPLICATION LISTS A LITANY OF ALLEGED HARASSMENT AND
19 OFFENSES ON THE PART OF MR. OLSON, UNDER EXAMINATION
20 MS. ██████████ CONFIRMED THAT THE BULK OF THE ALLEGATIONS
21 MADE IN HER 2017 APPLICATION WERE MERELY DUPLICATES OF
22 ALLEGATIONS MADE IN 2015 AND WERE SETTLED AS A PART OF
23 THAT 2015 APPLICATION.

24 NOTWITHSTANDING THAT SETTLEMENT,
25 MS. ██████████ WAS HOPING TO RETRY HER 2015 APPLICATION
26 HERE. THE COURT, HOWEVER, MADE IT CLEAR IT WOULD NOT
27 ALLOW THAT. WHEN PRESSED TO IDENTIFY NEW ALLEGATIONS,
28 MS. ██████████ PUSHED HER THEORY OF A VAST CONSPIRACY

1 COORDINATED AND FUNDED BY MR. OLSON TO HARASS HER IN
2 RETALIATION FOR HER ALLEGED REFUSAL TO HAVE SEX WITH HIM
3 MANY YEARS AGO.

4 TO THAT END, MS. ██████████'S CASE-IN-CHIEF
5 FOCUSES ON FOUR ALLEGED EVENTS. FIRST, SHE CLAIMS THAT
6 IN 2016 SOMEONE BROKE INTO HER UNIT THROUGH THE BATHROOM
7 WINDOW AND THREE DAYS LATER THROUGH HER BACK DOOR.
8 ALTHOUGH SHE PRESENTED NO EVIDENCE ON THIS POINT, THE
9 IMPLICATION WAS THAT MR. OLSON, OR SOMEONE HIRED BY HIM,
10 WAS RESPONSIBLE. TO SUPPORT HER THEORY, SHE CALLED
11 PERSONAL HANDYMAN AND FRIEND MICHAEL ROTH TO THE STAND.
12 MR. ROTH TESTIFIED THAT, ALTHOUGH HE REPAIRED THE WINDOW
13 AND DOOR, HE DID NOT WITNESS THE DAMAGE OCCUR AND HAD NO
14 IDEA WHO HAD CAUSED IT. IN FACT, HE DID NOT EVEN KNOW
15 WHO MR. OLSON WAS. MR. ROTH FURTHER CONFIRMED THAT THE
16 DOOR AND THE WINDOW AT ISSUE WERE LOCATED IN THE BACK OF
17 MS. ██████████'S UNIT IN CLOSE PROXIMITY TO A VACANT LOT
18 AND THE VERY BUSY ██████████ BOULEVARD.

19 MS. ██████████ WAS ALSO UNABLE TO TIE
20 MR. OLSON TO THESE ALLEGED BREAK-INS IN HER OWN
21 TESTIMONY. MR. OLSON TESTIFIED THAT HE HAD NOTHING TO DO
22 WITH THE ALLEGED BREAK-INS OR THE DAMAGE TO
23 MS. ██████████'S WINDOW OR DOOR.

24 NEXT, MS. ██████████ CLAIMED THAT IN 2016
25 MR. OLSON COLLUDED WITH ELSA MONROY, THE PROPERTY
26 SUPERVISOR, TO STEAL A LOCKBOX CONTAINING MS. ██████████'S
27 KEYS TO HER UNIT. MS. MONROY, HOWEVER, TESTIFIED THAT
28 THE LOCKBOX WAS CONFISCATED FROM THE HOA COMMON AREA BY

1 HOA PROPERTY MANAGEMENT AFTER NUMEROUS WARNINGS BECAUSE
2 ITS USE AND PRESENCE CONSTITUTED A VIOLATION OF THE
3 ██████████ CC&R'S. AS MANY WITNESSES CONFIRMED,
4 MS. ██████████ WAS USING HER UNIT AS A SHORT-TERM RENTAL
5 ADVERTISED ON AIRBNB. MS. ██████████ DID NOT DENY THIS.

6 MS. MONROY TESTIFIED THAT IN DOING SO AND IN
7 USING THE LOCKBOX TO FACILITATE THE AIRBNB PROCESS, SHE
8 CREATED A SECURITY ISSUE FOR EVERYONE AT THE ██████████
9 INCLUDING HERSELF WHICH IS WHY IT WAS REMOVED.

10 MS. ██████████, HOWEVER, WOULD HAVE THE COURT
11 BELIEVE THAT MS. MONROY WAS REALLY ACTING AT MR. OLSON'S
12 DIRECTIVE AS A CO-CONSPIRATOR IN MR. OLSON'S MASTER PLAN
13 TO HARASS MS. ██████████. MS. ██████████ CALLED KENT ARGUE
14 TO SUPPORT HER STORY ABOUT THE LOCKBOX. BUT HE WAS
15 UNABLE TO DO SO. IN FACT, MR. ARGUE OFFERED NO TESTIMONY
16 CONNECTING THE ALLEGED LOCKBOX TO MR. OLSON AND TESTIFIED
17 THAT HE NEVER OBSERVED MR. OLSON AT THE ██████████ EVEN
18 THOUGH HE VISITED OFTEN.

19 NOT SURPRISINGLY, MULTIPLE WITNESSES
20 TESTIFIED THAT MS. ██████████ HAD A HABIT OF VIOLATING THE
21 CC&R'S, NOT ONLY BY USING HER UNIT AS AN AIRBNB, BUT ALSO
22 USING IT AS A FILMING LOCATION ALL WITHOUT HOA APPROVAL.
23 MR. OLSON TESTIFIED THAT HE CAUGHT MS. ██████████ FILMING
24 IN HIS BASEMENT WITH A WOMAN IN LINGERIE ON A MATTRESS.
25 MS. ██████████ DID NOT DENY THIS EITHER.

26 HE FURTHER TESTIFIED THAT HE BELIEVED
27 MS. ██████████ FILED HER NUMEROUS CASES AGAINST HIM, FOUR
28 IN TOTAL IN THE LAST THREE YEARS, IN RETALIATION FOR THE

1 HOA'S REFUSAL TO ALLOW HER TO VIOLATE ITS RULES.

2 MS. ██████ DID NOT DENY THIS. MR. OLSON, OF COURSE,
3 TESTIFIED THAT HE HAD NOTHING TO DO WITH MS. ██████'S
4 LOCKBOX.

5 NEXT, MS. ██████ TURNED TO JULY, 2017,
6 WHEN SHE CLAIMS MR. OLSON HIRED A TEAM OF THUGS TO HARASS
7 HER. HER STAR WITNESS TO SUPPORT THIS STORY WAS HER GOOD
8 FRIEND, BODYGUARD, AND PART-TIME ROOMMATE TITUS FOTSO.
9 MR. FOTSO TESTIFIED THAT WHILE HE WAS LIVING IN
10 MS. ██████'S UNIT AND ACTING AS MS. ██████'S
11 BODYGUARD, HE NOTICED SUSPICIOUS ACTIVITY BOTH IN THE
12 FORM OF THE ADDITIONAL RENTER IN THE UNIT. AND WHEN HE
13 NOTICED THESE FOUR INDIVIDUALS IN THE WALKWAY AREA BEHIND
14 HER UNIT, A WALKWAY SHARED WITH THREE OTHER UNITS,
15 MR. FOTSO WAS COMPLETELY UNABLE TO TIE ANY CONDUCT OF THE
16 SUSPICIOUS RENTER TO MR. OLSON.

17 MR. FOTSO ALSO TESTIFIED WHEN HE OBSERVED
18 THESE INDIVIDUALS IN THE WALKWAY BEHIND THE UNITS WHICH
19 HE WAS UNAWARE WAS A COMMON AREA, MS. ██████ WAS NOT
20 EVEN LIVING IN THE UNIT AT THE TIME. WHEN HE WENT TO
21 INVESTIGATE THE ACTIVITY, MR. FOTSO FOUND FIVE, QUOTE,
22 "STRANGERS" IN THE AREA. HIS IDENTIFICATION OF THESE
23 INDIVIDUALS AS STRANGERS WAS ODD AS HE HIMSELF WAS NOT AN
24 OWNER OR PERMANENT RESIDENT OF THE ██████ AND HAD ONLY
25 RECENTLY MOVED IN.

26 MR. FOTSO CLAIMED THAT HE CONFRONTED ONE OF
27 THESE STRANGERS ASKING WHY THEY WERE THERE. THE
28 INDIVIDUAL IDENTIFIED HIMSELF AS DAVID. SAID THAT HE WAS

1 THE ON-SITE GENERAL CONTRACTOR FOR THE [REDACTED].
2 MR. FOTSO LATER LEARNED THAT DAVID WAS DAVID FEDER.
3 MR. FOTSO CLAIMED THAT THE OTHER FOUR INDIVIDUALS WERE
4 LOOKING IN MS. [REDACTED]'S WINDOWS AND PICKING THROUGH HER
5 TRASH ALL IN BROAD DAYLIGHT, ALL IN VIEW OF THE [REDACTED]
6 SECURITY CAMERAS.

7 WHEN SHOWED THE FOOTAGE FROM THE CAMERA,
8 MR. FOTSO WAS UNABLE TO CLEARLY IDENTIFY ANY SUSPICIOUS
9 ACTIVITY FROM THESE INDIVIDUALS. MR. FOTSO IGNORED THE
10 FACT THAT THE VIDEO DID NOT SHOW ANY OF THEM PICKING
11 THROUGH TRASH NOR COULD TRASH EVEN BE SEEN ON THE VIDEO.
12 IT ALSO DID NOT SHOW THEM LOOKING THROUGH MS. [REDACTED]'S
13 WINDOWS. INSTEAD THEY WERE TAKING PICTURES OF THE VACANT
14 LOT NEXT DOOR. TO EXPLAIN THIS, MR. FOTSO CLAIMED THAT
15 THE VIDEO FOOTAGE MUST HAVE BEEN DOCTORED TO REMOVE THE
16 EVIDENCE.

17 TO SUPPORT THIS THEORY THAT THE CONDO
18 SURVEILLANCE FOOTAGE HAD BEEN DOCTORED, MS. [REDACTED]
19 CALLED MR. DAVID SILVER AND ALSO MONROY TO TESTIFY.
20 MR. SILVER IS THE INDEPENDENT CONTRACTOR THAT INSTALLED
21 THE [REDACTED] SECURITY CAMERAS AND MAINTAINED THE
22 FOOTAGE.

23 MR. SILVER AND MS. MONROY WERE THE ONLY
24 PERSONS WITH ACCESS TO THE FOOTAGE. MR. SILVER CONFIRMED
25 THAT HE NEVER MANIPULATED THE FOOTAGE NOR GAVE ANYONE
26 ELSE ACCESS TO DO SO NOR DID MR. OLSON ASK HIM TO DO SO.
27 MR. SILVER EVEN STATED THAT HE DIDN'T THINK IT WAS
28 POSSIBLE TO DOWNLOAD THE FOOTAGE TO DOCTOR TO IT, TO

1 RE-UPLOAD IT TO THE DVR.

2 BEFORE LEAVING THE STAND, MR. SILVER
3 PROVIDED TWO POINTS OF TESTIMONY THAT REFLECT ON
4 MS. ██████████'S TRUE INTENTIONS. FIRST, HE TESTIFIED THAT
5 WHEN MS. ██████████ CAME TO HIS OFFICE TO VIEW THE
6 ALLEGEDLY DOCTORED FOOTAGE, SHE SAW A PICTURE OF HIS
7 DAUGHTER ON HIS DESK AND THREATENED HIS FAMILY.
8 MS. ██████████ DID NOT DENY THIS. INSTEAD SHE CONFIRMED IT
9 INDICATING THAT SHE LATER CALLED HIM TO APOLOGIZE.

10 MR. SILVER NEXT CONFIRMED THAT DURING HER
11 APOLOGY CALL MS. ██████████ OFFERED TO DISMISS HIM FROM ONE
12 OF THE RELATED CIVIL CASES IN EXCHANGE FOR SIGNING A
13 DECLARATION DRAFTED BY HER IN THIS CASE. HE DECLINED TO
14 DO SO.

15 **MR. KANANI:** OBJECTION. MISSTATES FACTS IN
16 EVIDENCE.

17 **THE COURT:** OVERRULED.

18 **MR. KENNEDY:** MS. ██████████ DID NOT DENY THIS
19 EITHER. IN ANY EVENT, MR. OLSON TESTIFIED THAT HE DID
20 NOT HAVE ACCESS TO THE ██████████ SECURITY FOOTAGE, A FACT
21 WHICH MS. MONROY CONFIRMED IN HER TESTIMONY. MR. OLSON
22 ALSO CONFIRMED THAT HE NEVER DOCTORED THE FOOTAGE NOR
23 ASKED ANYONE ELSE TO DO SO.

24 MS. MONROY ALSO TESTIFIED THAT SHE NEVER
25 DOCTORED THE FOOTAGE NOR ASKED ANYONE TO DO SO NOR GAVE
26 ANYONE ACCESS TO DO SO. THERE IS NO EVIDENCE THAT THE
27 SECURITY CAMERA FOOTAGE WAS DOCTORED IN ANY WAY.

28 BACK TO MR. OLSON'S ALLEGED THUGS IN THE

1 WALKWAY. AGAIN, MR. FOTSO TESTIFIED THAT THEY WERE
2 ACCOMPANIED BY MR. FEDER. MR. FEDER TESTIFIED AS WELL.
3 HE CONFIRMED THAT HE WAS THERE WITH THESE INDIVIDUALS.
4 THAT THEY WERE NOT STRANGERS. THAT THEY WERE A TEAM THAT
5 WAS AUTHORIZED TO VISIT THE PROPERTY BY THE HOA AND THAT
6 THE VISIT HAD BEEN DISCLOSED TO THE [REDACTED]
7 HOMEOWNER'S.

8 MR. FEDER TESTIFIED THAT RATHER THAN
9 MALICIOUS THUGS HIRED TO HARASS THE ABSENT MS. [REDACTED],
10 THESE FOUR INDIVIDUALS WERE TOURING THE PROPERTY IN
11 CONNECTION WITH THE PROPOSED CONSTRUCTION TAKING PLACE ON
12 THE VACANT LOT NEXT DOOR. MR. FEDER EXPLAINED THAT THE
13 FOUR INDIVIDUALS, ONE OF WHOM WAS A PREGNANT WOMAN, WERE
14 EITHER ARCHITECTS, ENGINEERS, OR CONSTRUCTION
15 REPRESENTATIVES SENT ON BEHALF OF THE NAMED LAND OWNER.
16 WHEN ACCOSTED BY MR. FOTSO, NONE OF THEM RAN NOR HID NOR
17 ACTED DEFENSIVELY. INSTEAD THEY ALLOWED HIM TO
18 PHOTOGRAPH THEM LOOKING ONLY MILDLY CONFUSED AS TO WHY HE
19 WAS DOING SO.

20 MR. FEDER FURTHER TESTIFIED THAT
21 MS. [REDACTED]'S BEHAVIOR MADE IT IMPOSSIBLE FOR HIM TO
22 WORK AT THE [REDACTED] AND THAT HE HAD TO QUIT AFTER YEARS
23 OF SERVICE. MR. FEDER TESTIFIED THAT MS. [REDACTED] HAD
24 FILED TWO LAWSUITS AGAINST HIM AND THAT HE WAS AFRAID OF
25 ANY CONTACT WITH HER BECAUSE IT WOULD RAISE ADDITIONAL
26 CLAIMS. HE ALSO TESTIFIED THAT SHE ROUTINELY VIOLATED
27 THE CC&R'S. IT WAS DIFFICULT TO HIRE SUBCONTRACTORS
28 BECAUSE OF HER BEHAVIOR.

1 HE FINALLY CONFIRMED THAT HE HAD NEVER
2 HARASSED HER, HAD NEVER SEEN ANYONE ELSE HARASS HER
3 INCLUDING MR. OLSON, AND MR. OLSON HAD NEVER DIRECTED HIM
4 TO HARASS HER. INDEED ACCORDING TO MR. FEDER, THE
5 OPPOSITE WAS TRUE. THAT MS. OLSON WAS THE ONE HARASSING
6 INDIVIDUALS AT THE [REDACTED].

7 FOR HIS PART, MR. OLSON TESTIFIED THAT HE
8 DID NOT KNOW THESE FOUR STRANGERS. HE DID NOT HIRE THEM
9 TO HARASS MS. [REDACTED]. FINALLY, MS. [REDACTED] INTRODUCED
10 THE NOW INFAMOUS MEN IN BLACK WHO SHE CLAIMS WERE HIRED
11 BY MR. OLSON IN 2017 TO STALK HER, SURVEIL HER, AND
12 PHOTOGRAPH HER. MS. [REDACTED]'S KEY WITNESS IN HER MEN IN
13 BLACK STORY IS THE MYSTERIOUS AND NOTICEABLY ABSENT AMADO
14 MORENO.

15 ACCORDING TO MS. [REDACTED] AND SEVERAL
16 DECLARATIONS SUBMITTED BY MR. MORENO, MR. MORENO WAS A
17 LONG-TIME EMPLOYEE AT THE CAFE ACROSS THE STREET FROM THE
18 [REDACTED]. SOMETIME IN 2017 MR. MORENO ALLEGEDLY REPORTED
19 TO MS. [REDACTED] THAT THE MEN IN BLACK WERE REGULARLY
20 VISITING THE CAFE LOOKING FOR HER. NO CORROBORATING
21 EVIDENCE WAS PROVIDED.

22 BEYOND THAT, IT DEFIES REASON TO THINK THAT
23 MR. OLSON WOULD CONCOCT SUCH AN ABSURD PLAN. BUT THE
24 STORY GETS MORE ABSURD. MR. MORENO ALSO TESTIFIED BY
25 DECLARATION THAT THESE MEN FOLLOWED HIM HOME; THAT HE WAS
26 SUBSEQUENTLY POISONED BY A GLASS OF WATER AT A RESTAURANT
27 NEAR HIS HOME; THAT HE WAS CHASED BY A TOW TRUCK DRIVER
28 BRANDISHING A BERETTA; THAT A MENTALLY ILL CRIMINAL BROKE

1 OUT OF PRISON, BROKE INTO HIS HOME AND TRIED TO SET IT ON
2 FIRE.

3 HE FURTHER DECLARED THAT ALTHOUGH THE
4 MENTALLY ILL CRIMINAL WAS APPREHENDED AND PUT IN PRISON,
5 HE BROKE OUT OF PRISON AGAIN TO BREAK INTO MR. MORENO'S
6 HOME A SECOND TIME AND STEAL HIS ENTIRE FILE AND
7 DOCUMENTS RELATED -- TO THE POLICE REPORTS RELATED TO
8 MS. [REDACTED].

9 SETTING ASIDE THE SHEAR ABSURDITY OF THIS,
10 THE IMPLICATION BEHIND MR. MORENO'S ALLEGATIONS IS THAT
11 MR. OLSON ORCHESTRATED ALL OF THESE EVENTS. NO EVIDENCE
12 WAS PROVIDED TO SUPPORT THIS THEORY. MS. [REDACTED]
13 HERSELF DECLARED THAT THESE SAME MEN IN BLACK BROKE INTO
14 HER HOME AT THE [REDACTED] THREE DAYS LATER AND THREE DAYS
15 LATER HER STOVE EXPLODED BECAUSE THEY TAMPERED WITH IT,
16 THE IMPLICATION BEING THAT MR. OLSON WAS BEHIND THIS.

17 MS. [REDACTED] FAILED TO PRESENT ANY EVIDENCE
18 WHATSOEVER CORROBORATING THIS OR ANY OF THE EVENTS THAT
19 OCCURRED AT THE HANDS OF ANY OF THESE VILLAINS THAT ARE
20 MENTIONED BY MR. MORENO. IN FACT, MS. [REDACTED] READILY
21 ADMITTED THAT SHE HAD NEVER SEEN MR. OLSON WITH ANY OF
22 THESE VILLAINS AND HAD NO PERSONAL KNOWLEDGE OF MR. OLSON
23 EVER CONTACTING THEM OR HIRING THEM.

24 MR. OLSON EMPHATICALLY CONFIRMED THAT HE
25 NEVER HIRED ANY MEN WHETHER THEY WERE WEARING BLACK OR
26 SOMETHING ELSE. NO TOW TRUCK DRIVERS, NO MENTALLY ILL
27 CRIMINALS TO HARASS MS. [REDACTED]. MS. [REDACTED] FURTHER
28 TESTIFIED AROUND THIS TIME THAT A HAIRDRESSER, A BUSBOY,

1 AND LENNY DYKSTRA BEGAN TO HARASS HER. NO EVIDENCE WAS
2 PROVIDED SUPPORTING ANY OF THIS. AND MR. OLSON TESTIFIED
3 THAT HE HAD NO KNOWLEDGE OF ANY OF IT.

4 ONE CAN'T HELP BUT WONDER WHY MR. MORENO IS
5 NOWHERE TO BE FOUND. MS. [REDACTED] HAS MADE THE
6 IMPLICATION THAT MR. OLSON IS RESPONSIBLE FOR
7 MR. MORENO'S ABSENCE. THERE IS OBVIOUSLY NO EVIDENCE OF
8 THIS. IF MR. MORENO, IN FACT, DOES EXIST AND HIS
9 STATEMENTS ARE REAL, ONE CAN ONLY SPECULATE AS TO THE
10 REASON MR. MORENO APPEARS TO HAVE BEEN MORE WILLING TO
11 ACCEPT A BENCH WARRANT FOR HIS ARREST THAN TO APPEAR IN
12 COURT. IT MAY BE BECAUSE IT'S A LOT EASIER TO MAKE
13 OUTRAGEOUS ALLEGATIONS BY WRITTEN STATEMENTS THAN TO FACE
14 CROSS-EXAMINATION.

15 REGARDLESS, MR. OLSON WAS DEPRIVED OF THE
16 OPPORTUNITY TO TEST THE VERACITY OF MR. MORENO'S
17 DECLARATIONS. ASIDE FROM MR. OLSON, MS. [REDACTED],
18 MR. FEDER, MR. FOTSO, MR. ARGUE, MR. ROTH, MS. SILVER,
19 AND MS. MONROY, THE REMAINING WITNESSES INCLUDED KELLY
20 O'NEAL, CHRISTINE OLSON, ROBERT KILLIAN, AND DOUG ECONN.

21 MS. [REDACTED] POINTS TO MR. KILLIAN AS
22 EVIDENCE OF ADDITIONAL HARASSMENT. HOWEVER,
23 MR. KILLIAN'S TESTIMONY WAS THAT THE EVENTS --

24 **THE COURT:** PAUSE FOR JUST A MINUTE.

25 I USE THIS TIME ON THE RECORD TO REPEAT THE
26 ANNOUNCEMENT. IT IS AGAINST THE COURT'S STANDING ORDER
27 TO RECORD PROCEEDINGS. WE HAD A NOISE BACK THERE AT THE
28 BACK OF THE COURTROOM THAT INDICATED THAT SOMEONE WAS

1 THERE. SO I'M REPEATING THE ANNOUNCEMENT THAT IT IS A
2 STANDING COURT ORDER THAT RECORDING THESE PROCEEDINGS IN
3 ANY WAY, SHAPE, OR FORM, VIDEO, AUDIO, OR OTHERWISE, IS
4 NOT ALLOWED ACCORDING TO THE PRESIDING JUDGE'S ORDER
5 POSTED ON THE BULLETIN, OUTSIDE THE COURTROOM, AND IT'S A
6 STANDING ORDER OF THE PRESIDING JUDGE PUNISHABLE BY
7 CONTEMPT OF COURT.

8 MR. KENNEDY, PARDON THE INTERRUPTION.
9 PLEASE, CONTINUE.

10 **MR. KENNEDY:** THAT'S ALL RIGHT. THANK YOU.

11 MS. [REDACTED] POINTED TO MR. KILLIAN'S
12 TESTIMONY. MR. KILLIAN TESTIFIED THAT HE LEFT THE EMPLOY
13 AT THE HOA IN 2015. HIS TESTIMONY WAS, THEREFORE,
14 IRRELEVANT. IT WAS ALSO UNSUPPORTED. THE TESTIMONY OF
15 THESE ADDITIONAL WITNESSES NOT ONLY CONFIRMED THAT NOT A
16 SINGLE ONE OF THEM OBSERVED HARASSING BEHAVIOR BY
17 MR. OLSON BUT PROVIDED CREDIBLE DETAILS AND EXPLANATIONS
18 ON THE EVENTS IN QUESTION DISPELLING ANY HINT OF
19 SUSPICIOUS CONDUCT.

20 MS. [REDACTED] ALSO CALLED TO THE STAND HER
21 TAX PREPARER MR. MIRAMONTES. LIKE MR. KILLIAN, THE
22 EVENTS THAT HE TESTIFIED ABOUT WERE IN 2015.
23 MR. MIRAMONTES CONFIRMED THAT HE WAS SUPPOSED TO BE A
24 WITNESS AT THE 2015 HEARING ON THE RESTRAINING ORDER
25 APPLICATION. HIS TESTIMONY WAS, THEREFORE, IRRELEVANT.
26 AFTER THREE DAYS OF TESTIMONY AND 14 WITNESSES,
27 MR. [REDACTED] WAS NOT ABLE TO PROVIDE ANY CREDIBLE
28 EVIDENCE SUPPORTING ANY OF HER CLAIMS AGAINST MR. OLSON.

1 HER APPLICATION FOR A RESTRAINING ORDER APPEARS TO HAVE
2 BEEN FILED AS A MISGUIDED ATTEMPT TO BOLSTER HER CIVIL
3 CASE. IT SHOULD BE DENIED.

4 MR. OLSON HAS PUT A LOT OF TIME AND MONEY
5 INTO DEFENDING AGAINST HER CLAIMS BECAUSE HE'S A MAN OF
6 INTEGRITY AND PRINCIPLES AND IT'S VERY IMPORTANT FOR HIM
7 TO CLEAR HIS NAME. IN STARK CONTRAST TO MS. ██████████'S
8 APPLICATION, MR. OLSON HAS OFFERED CLEAR, CONCISE, AND
9 UNDISPUTED EVIDENCE SUPPORTING HIS CONTINUED NEED FOR A
10 RESTRAINING ORDER.

11 MR. OLSON'S EVIDENCE IS NOT BASED ON
12 CONJECTURE OR SPECULATION. IT'S NOT BASED ON INDIRECT
13 TIES TO VARIOUS UNIDENTIFIED INDIVIDUALS. RATHER HIS
14 EVIDENCE WHICH WAS CORROBORATED BY MR. ECONN WHO IS AN
15 EYEWITNESS IS THAT ON THE AFTERNOON OF SEPTEMBER 10,
16 2017, HE WAS ACCOSTED NOT ONCE BUT TWICE BY A TWO PERSON
17 TEAM UNDER MS. ██████████'S DIRECTION.

18 MS. ██████████ NEVER DENIED THAT THIS INCIDENT
19 OCCURRED. NOR COULD SHE AS MR. OLSON FILMED IT. ONE OF
20 THE INDIVIDUALS UNDER MS. ██████████'S DIRECTION WAS
21 MR. FOTSO, HER IMPOSING BODYGUARD, WHO TESTIFIED THAT
22 HE'S ALWAYS THERE TO, QUOTE, "PROTECT" HER WHEN SHE
23 CALLS.

24 MS. ██████████ ADMITTED THAT BOTH OF THESE
25 INDIVIDUALS HAD BEEN CONSUMING ALCOHOL THAT DAY, A
26 DANGEROUS ELEMENT IN A VOLATILE SITUATION. THIS INCIDENT
27 REPRESENTED A DISCERNABLE ESCALATION IN THE HARASSMENT BY
28 MS. ██████████. GOING BEYOND JUST LEGAL THREATS, NOW

1 MS. ██████████ WAS THREATENING MR. OLSON'S SAFETY AND
2 SECURITY. MR. OLSON TESTIFIED THAT THESE INDIVIDUALS
3 ACTED IN AN AGGRESSIVE AND THREATENING MANNER AND THAT HE
4 FEARED FOR HIS SAFETY. HE FURTHER TESTIFIED THAT
5 MS. ██████████ WAS THERE DIRECTING HER ACTIONS. MR. ECONN
6 CORROBORATED THIS TESTIMONY.

7 MR. OLSON TESTIFIED THAT HE NO LONGER FEELS
8 SAFE AT THE ██████████ EXPLAINING WHY HE'S ASKED FOR
9 ADDITIONAL SECURITY MEASURES, A REQUEST COMPLETELY
10 INCONSISTENT WITH AN INDIVIDUAL WHO IS ENGAGED IN A
11 LONG-TERM PERVASIVE SCHEME WITH MULTIPLE CO-CONSPIRATORS
12 TO HARASS MS. ██████████. MR. OLSON FEELS THAT, WITHOUT A
13 PERMANENT RESTRAINING ORDER AGAINST MS. ██████████, SHE AND
14 HER AGENTS, INCLUDING MR. FOTSO WHO TESTIFIED HE STILL
15 ACTS AS MS. ██████████'S BODYGUARD, WILL BE WAITING FOR HIM
16 READY TO HARASS HIM AND INTIMIDATE HIM AND, WORSE,
17 POSSIBLY HARM HIM.

18 MR. OLSON TESTIFIED THAT HE'S LOST ANY
19 ABILITY TO ENJOY HIS UNIT AT THE ██████████. MS. ██████████
20 EVEN SCARED OFF HIS RENTERS. THEY TERMINATED THE LEASE
21 EARLY BECAUSE OF HER. WITH ACTUAL AND UNDISPUTED
22 EVIDENCE OF HARASSMENT VIA TESTIMONY AND VIDEO FOOTAGE,
23 MR. OLSON HAS CLEARLY SATISFIED HIS BURDEN THAT HIS
24 RESTRAINING ORDER SHOULD BE EXTENDED FULL TERM.

25 MS. ██████████ HAS POINTED TO A VAST, BROAD
26 RANGING CONSPIRACY INCLUDING ATTORNEYS PRACTICING BEFORE
27 THIS COURT. SHE HAS ACCUSED MR. OLSON OF DOCTORING VIDEO
28 FOOTAGE, OF HIRING THIRD PARTIES. SHE'S ACCUSED HIM OF

1 COLLUDING WITH CRIMINALS, OF ATTEMPTING TO BREAK INTO HER
2 UNIT TO THREATEN HER LIFE. SHE CLAIMS THAT THE MOST
3 COMPELLING EVIDENCE OF MR. OLSON'S HARASSMENT IS THE
4 VIDEO FOOTAGE AND YET SHE PROVIDED ABSOLUTELY NO EVIDENCE
5 THAT THE VIDEO FOOTAGE WAS DOCTORED OR MANIPULATED. AND
6 EVERY SINGLE WITNESS WHO TESTIFIED HAVING ACCESS TO THE
7 VIDEO FOOTAGE CONFIRMED THAT THEY HAD NOT DONE SO NOR
8 PROVIDED ACCESS TO ANYONE ELSE TO DO SO.

9 SHE PROVIDED ABSOLUTELY NO EVIDENCE
10 CONNECTING MR. OLSON TO THE FOUR INDIVIDUALS THAT SHE
11 CLAIMS WHO IN BROAD DAYLIGHT WERE HARASSING HER BY
12 PICKING THROUGH HER TRASH AND LOOKING THROUGH THE
13 WINDOWS. THERE IS NO PEACE BETWEEN MR. OLSON AND
14 MS. [REDACTED]. THE ONLY LACK OF PROXIMITY WAS CREATED BY
15 MR. OLSON BECAUSE HE DOES NOT FEEL SAFE VISITING HIS UNIT
16 ANYMORE. AND THERE IS MASSIVE DOWNSIDE TO EXTENDING
17 MS. [REDACTED]'S RESTRAINING ORDER APPLICATION. NOT JUST
18 BECAUSE IT HAS NO EVIDENCE SUPPORTING IT. BUT BECAUSE OF
19 THE IMPACT ON MR. OLSON WHO IS A GOOD AND HONEST MAN, A
20 FATHER AND A BUSINESS OWNER. HE DESERVES TO LIVE HIS
21 LIFE IN PEACE WITHOUT THREAT OF HARASSMENT AND WITHOUT
22 THREAT OF A RESTRAINING ORDER AGAINST HIM.

23 THANK YOU, YOUR HONOR.

24 **THE COURT:** ARE THESE MATTERS NOW SUBMITTED FOR
25 DECISION?

26 **MR. KANANI:** YES.

27 **MR. KENNEDY:** THEY ARE.

28 **THE COURT:** SUBMITTED. OKAY.

1 FIRST OF ALL, THE COURT PREVIOUSLY ISSUED A
2 BENCH WARRANT AND SET BAIL AT \$35,000 FOR WITNESS AMADO,
3 A-M-A-D-O, MORENO, M-O-R-E-N-O, WHO HAD NOT APPEARED AS
4 ORDERED BY JUDGE LEWIS IN DEPARTMENT TWO AND AS ORDERED
5 BY THIS JUDGE IN THIS DEPARTMENT ON THE FIRST DAY OF
6 THESE HEARINGS. AND SO THE BENCH WARRANT PREVIOUSLY
7 ISSUED BUT NOT RELEASED BECAUSE THE REQUESTING PARTY
8 MS. ██████████ FAILED TO PAY THE FEES TO THE SHERIFF'S
9 DEPARTMENT TO CARRY OUT THAT BENCH WARRANT. THEREFORE,
10 THE COURT ORDERS THE BENCH WARRANT AND THE BAIL SET AS TO
11 AMADO MORENO RE-CALLED AND QUASHED AND SET ASIDE.

12 THANK YOU TO BOTH COUNSEL AND BOTH PARTIES
13 FOR YOUR PROFESSIONALISM. AND I SAY THAT WITH SOME
14 DEGREE OF EXPRESSION OF CONCERN. BECAUSE AS I STATED AT
15 THE BEGINNING, THE COURT HANDLES MANY OF THESE MATTERS
16 AND HAS HANDLED MANY OF THESE MATTERS OVER THE YEARS AND
17 UNDERSTANDS ONLY A PART OF THE DYNAMIC THAT EXISTS
18 BETWEEN PERSONS WHO ARE INVOLVED IN PERSONAL AND LEGAL
19 DISPUTES SUCH AS THEY ARE IN THIS CASE. AND THAT
20 OFTENTIMES THERE'S A TENDENCY TO, IF YOU WILL, WEAR ONE'S
21 EMOTIONS ON CLOSE PROXIMITY TO YOUR BEHAVIOR IN COURT. I
22 DID HAVE TO CALL OUT ON BOTH PARTIES DURING THESE
23 HEARINGS ON MORE THAN ONE OCCASION, EACH OF YOU ON MORE
24 THAN ONE OCCASION, ON BEHAVIOR THAT WAS INAPPROPRIATE AND
25 REFLECTIVE OF DISRESPECTFUL CONDUCT TOWARD THE OTHER
26 PARTY AND TOWARD THE PROCESS.

27 UNDERSTAND THAT I VIEW THAT AS ONLY MILDLY,
28 ONLY MILDLY AFFECTING ADVERSELY YOUR CREDIBILITY BUT MORE

1 REALISTICALLY REFLECTING YOUR PERSONAL STRONG FEELINGS
2 ABOUT THESE MATTERS WHICH ARE BEFORE THE COURT. THAT IS
3 RECOGNIZED. THE COURT UNDERSTANDS THAT THAT CAN HAPPEN.
4 BUT IT IS ABSOLUTELY ESSENTIAL IN THIS PROCESS AND IN THE
5 PROCESS THAT YOU HAVE IN THE WEST DISTRICT COURT WHERE
6 THE OTHER CASE OR CASES ARE PENDING BUT LARGER THAN THAT
7 IN THE WAY THAT YOU MOVE ABOUT AND CONDUCT YOURSELF IN
8 THE PUBLIC AND PRIVATE SPACES THAT YOU DO SO WITH
9 UNDERSTANDING THAT THERE ARE OTHERS AROUND YOU WHO
10 INTERSECT OR MAY INTERSECT WITH YOUR SPACE OR YOUR
11 WALKING ABOUT IN LIFE AND THAT IT'S APPROPRIATE IN ALL
12 FACETS OF YOUR LIFE TO TREAT OTHERS WITH DIGNITY AND
13 RESPECT AND A LOT OF PATIENCE AND TO NOT OVERREACT ON
14 SITUATIONS WHERE OVERREACTION CAN ONLY ESCALATE IN
15 SITUATIONS AND LEAD TO SUSPICION, LEAD TO HURT FEELINGS,
16 LEAD TO MORE ANXIETY AND CONFLICT.

17 IT IS UP TO EACH INDIVIDUAL TO CHOOSE TO
18 STEP BACK FROM THAT LINE WHEN YOU SENSE YOURSELF
19 APPROACHING IT. SO THAT IS WHY THE COURT SETS THESE
20 GUIDELINES AND BOUNDARIES IN THIS COURTROOM FOR
21 APPROPRIATE BEHAVIOR BECAUSE WE ARE GOVERNED BY RULES OF
22 CIVILITY. WE ARE REQUIRED TO ACT WITH CIVILITY. UNDER
23 OUR RULE OF LAW, WE CANNOT RESOLVE DISPUTES IN A CIVIL,
24 LAWFUL MANNER UNLESS EVERYONE, INCLUDING JUDGES AND STAFF
25 AND LITIGANTS AND ATTORNEYS, ALL OBSERVE THESE RULES OF
26 ENGAGEMENT WITH RESPECT AND DIGNITY IN THE COURTROOM FOR
27 YOUR POSITION AND PLACE YOUR DISPUTE BEFORE THE COURT TO
28 BE RESOLVED BY THE COURT IN A PEACEFUL, LAWFUL MANNER.

1 TO THE EXTENT THAT THAT GOT MUDDLED, I
2 CALLED IT. BUT IT WAS NOT OVER THE TOP AND IT WAS NOT
3 FATAL TO EITHER CASE, THOSE INCIDENCES OF WHAT I CALL
4 MISBEHAVIOR. JUST KNOW THAT AND KNOW THAT IT CAME CLOSE
5 AND YOU APPROPRIATELY STEPPED BACK ON ALL SIDES.

6 I HAVE A JUDGE ASKING FOR A BRIEF
7 CONFERENCE. STAY RIGHT THERE.

8
9 (PAUSE IN THE PROCEEDINGS.)
10

11 **THE COURT:** TO RESUME, THANK YOU AGAIN FOR YOUR
12 PROFESSIONALISM. AND AS MUCH AS POSSIBLE, STREAMLINE
13 PRESENTATION KEEPING IN YOUR TIME ESTIMATES. MANY TIMES
14 COMING UNDER THOSE ESTIMATES TO KEEP THIS CASE FLOWING,
15 MOVING, AND FINISHED. THAT IS APPRECIATED BY THE COURT
16 PARTICULARLY IN THE CIVIL HARASSMENT AND DOMESTIC
17 VIOLENCE CASES THAT WE HEAR BECAUSE THESE ARE PROCEDURES
18 THAT ARE TO BE EXPEDITED. THEY HAVE THE HIGHEST PRIORITY
19 IN OUR SYSTEM. AND IT IS OUR OBJECTIVE TO DISPOSITION
20 THESE CASES AS QUICKLY AS POSSIBLE BECAUSE THEY INVOLVE
21 RESTRAINING ORDERS AND INJUNCTIONS AND REGISTRATIONS OF
22 ORDERS IN THE CALIFORNIA LAW ENFORCEMENT
23 TELECOMMUNICATIONS SYSTEM CALLED CLETS. AND THESE
24 MATTERS DON'T LEND THEMSELVES TO THE UNUSUAL SITUATION
25 THAT HAPPENED HERE WHERE THEY'RE IN THE SYSTEM FOR OVER
26 14 MONTHS BEFORE THEY ARE DISPOSITIONED. THAT CONCERNED
27 THIS COURT GREATLY AND SUPPORTS THE EXPEDITED PROCESS
28 THAT WE HAVE TO ENGAGE.

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1 I THANK YOU, COUNSEL, AND PARTIES FOR
2 UNDERSTANDING AND APPRECIATING THAT AND ASSISTING THE
3 COURT IN GETTING IT DONE.

4 THE COURT IS REQUIRED TO APPLY THE LAW FROM
5 A STATUTE CODE OF CIVIL PROCEDURE SECTION 527.6. IT'S
6 THE CIVIL HARASSMENT ACT. AND THAT ACT ALLOWS FOR
7 TEMPORARY ORDERS WHICH WERE GRANTED ON BOTH SIDES IN THIS
8 CASE IN EACH OF THESE TWO SEPARATE RESTRAINING ORDERS.
9 BUT ALSO TO CONDUCT THE HEARING TO DETERMINE WHETHER A
10 PERMANENT ORDER SHOULD BE PUT IN PLACE ALONG WITH AN
11 INJUNCTION FOR A PERMANENT RESTRAINING ORDER, PERSONAL
12 CONDUCT AND STAYAWAY ORDERS, AND OTHER ORDERS.

13 AND THE COURT APPLIED THAT STATUTE. AND TO
14 START WITH THE BASICS AS I ALWAYS DO, LET ME JUST
15 PARAPHRASE AND OUTLINE THE LEGAL FRAMEWORK THAT THE COURT
16 RECEIVED THE EVIDENCE UNDER THE STATUTE AND THEN I WILL
17 GO THROUGH THE EVIDENCE AND STATE MY FINDINGS ON THE
18 EVIDENCE, WHAT WAS SIGNIFICANT, PERSUASIVE, AND PROVED OR
19 MADE IT TOWARD THE PROOF OF CIVIL HARASSMENT RESTRAINING
20 ORDERS AND WHAT WAS NOT SO PERSUASIVE OR LACKED
21 CREDIBILITY, LACKED SUPPORT WHEN THE COURT APPLIES THE
22 LAW.

23 THE LAW THE COURT APPLIES IN 527.6 REQUIRES
24 THAT HARASSMENT BE RESTRAINED FROM FURTHER ACTION BY
25 TEMPORARY ORDERS. AND IN DEFINING HARASSMENT, THE COURT
26 ALSO ALLOWS UNDER THIS STATUTE THAT AT THE TIME OF THE
27 HEARING WITHIN 25 DAYS AFTER THAT THE COURT DETERMINE BY
28 CLEAR AND CONVINCING EVIDENCE, BY CLEAR AND CONVINCING

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1 EVIDENCE, THAT IS, THE BURDEN OF PROOF ON THESE
2 PROCEEDINGS, THAT IS 527.6 SUBDIVISION (I) WHETHER OR NOT
3 UNLAWFUL HARASSMENT EXISTS AND WHETHER THE ORDER
4 PROHIBITING HARASSMENT OR THE INJUNCTION SHOULD BE IN
5 PLACE FOR A PERIOD OF NO LESS THAN THREE YEARS OR UP TO
6 FIVE YEARS. AS MUCH AS FIVE YEARS. AND THESE ORDERS ARE
7 ALSO RENEWABLE AT THE END OF THE EXPIRATION FOR
8 ADDITIONAL TIME. AND SO THAT IS THE STANDARD.

9 AND SO THE COURT'S TASK IN THIS IS TO VIEW
10 THE EVIDENCE AND DECIDE WHETHER OR NOT HARASSMENT HAS
11 OCCURRED. HARASSMENT CAN TAKE MANY FORMS. THE STATUTE
12 DEFINES IT AS SUCH THINGS AS SUBDIVISION (B)(1), A COURSE
13 OF CONDUCT. THIS CAN BE A PATTERN OF CONDUCT, AN ACT, OR
14 ACTS OVER A PERIOD OF TIME HOWEVER SHORT SHOWING SOME
15 CONTINUITY OF PURPOSE INCLUDING STALKING, MAKING
16 HARASSING TELEPHONE CALLS, SENDING HARASSING
17 CORRESPONDENCE TO INDIVIDUALS BY ANY MEANS. SO THIS
18 WOULD INCLUDE PUBLIC, PRIVATE MAILS, E-MAILS,
19 INTER-OFFICE MAILS, FACSIMILE, DIGITAL OR ELECTRONIC
20 TRANSMISSION. THE STATUTES HAVE BEEN BROADLY DEFINED TO
21 REFLECT THE TRANSMISSION OF COMMUNICATIONS IN ANY MANNER
22 AS LONG AS IT SHOWS SOME CONTINUITY OF PURPOSE.

23 AND THE SECOND DEFINITION OF HARASSMENT
24 UNDER THE ACT IS THAT THE CONDUCT WOULD PROVE SOME
25 CREDIBLE THREAT OF VIOLENCE. CREDIBLE THREAT OF VIOLENCE
26 IS DEFINED AS A KNOWING AND WILLFUL STATEMENT OR COURSE
27 OF CONDUCT THAT WOULD PLACE A REASONABLE PERSON IN FEAR
28 FOR HIS OR HER SAFETY OR THE SAFETY OF HIS OR HER

1 IMMEDIATE FAMILY. AND HERE IS THE IMPORTANT PART. AND
2 THAT SERVES NO LEGITIMATE PURPOSE. SERVES NO LEGITIMATE
3 PURPOSE.

4 A THIRD TYPE OF HARASSMENT IS THE WORD
5 "HARASSMENT" WHICH IS DEFINED BY THE STATUTE AS UNLAWFUL
6 VIOLENCE, A CREDIBLE THREAT OF VIOLENCE, OR A KNOWING AND
7 WILLFUL COURSE OF CONDUCT DIRECTED AT A SPECIFIC PERSON
8 THAT SERIOUSLY ALARMS, ANNOYS, OR HARASSES THE PERSON.
9 HERE IT IS AGAIN. AND THAT SERVES NO LEGITIMATE PURPOSE.

10 THE DEFINITION OF HARASSMENT GOES ON TO
11 STATE THAT THE COURSE OF CONDUCT MUST BE THAT WHICH WOULD
12 CAUSE A REASONABLE PERSON TO SUFFER SUBSTANTIAL EMOTIONAL
13 DISTRESS AND MUST ACTUALLY CAUSE SUBSTANTIAL EMOTIONAL
14 DISTRESS TO THE PETITIONER, THAT IS, THE PERSON ASKING
15 FOR THE RESTRAINING ORDER. IN THIS CASE, IT'S EACH OF
16 THE TWO PARTIES BEFORE THIS COURT.

17 AND IN ALL OF THESE THINGS, THE PERSON WHO
18 BEARS THE BURDEN OF PROOF, THAT IS, THE PETITIONER,
19 MS. [REDACTED] ON HER CASE AND MR. OLSON ON HIS CASE, MUST
20 DEMONSTRATE BY CLEAR AND CONVINCING EVIDENCE THAT THESE
21 STANDARDS HAVE BEEN MET. AND THERE HAVE BEEN MANY CASES
22 INTERPRETING THIS. AND THERE HAVE BEEN EVEN BROADER
23 DEFINITIONS APPLIED TOWARD WHAT CONSTITUTES CREDIBLE
24 THREAT OF VIOLENCE OR HARASSMENT IN MORE RECENT YEARS.
25 AND IT DOESN'T LEND -- IT DOESN'T LEND ITSELF TO BE ONLY
26 PHYSICAL VIOLENCE. BUT THE LACK OF PHYSICAL CONTACT CAN
27 BE CALLED HARASSMENT IF IT RISES TO THE LEVEL THAT I
28 DESCRIBED. THE COURSE OF CONDUCT. THE CREDIBLE THREAT

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1 OF VIOLENCE OR THE HARASSMENT. AND, AGAIN, IN ALL
2 INSTANCES, IT MUST BE SHOWN BY CLEAR AND CONVINCING
3 EVIDENCE.

4 AND SO THE COURT APPLIES THAT LAW TO WHAT
5 THE EVIDENCE SHOWED IN THIS CASE. AND TO TAKE
6 MS. ██████████'S ARGUMENT AS A FRAMEWORK, THE COURT
7 ADDRESSES THE EVIDENCE. AND THERE WAS OTHER EVIDENCE
8 THAT I WILL REVIEW AND COMMENT ON THAT WAS NOT ARGUED AS
9 WELL.

10 THE EVIDENCE THAT MS. ██████████ PRESENTED
11 SHOWED THAT SHE SUBJECTIVELY BELIEVED THAT SOMEONE WAS
12 TRYING TO CONTACT HER. I THINK THE STRONGEST MOST
13 PERSUASIVE EVIDENCE SHE PRESENTED WAS THAT SHE FELT AS IF
14 SOMEONE WAS FOLLOWING HER. SHE FELT AS IF SOMEONE WAS
15 SURVEILLING HER. SHE FELT AS IF HER SPACE AND HER SAFETY
16 WERE JEOPARDIZED. WHETHER SHE FELT THAT SHE WAS IN FEAR
17 OF SERIOUS HARM OR SAFETY WAS NOT AS PERSUASIVE.

18 THE CONNECT UP WITH MR. OLSON IS THE, IF YOU
19 WILL, A WORD THAT WE USE IN THE LAW "GRAVAMEN" OR THE
20 MAIN SUBSTANCE OF WHAT THE PETITIONER MS. ██████████ MUST
21 SHOW BY CLEAR AND CONVINCING EVIDENCE. AND THERE WERE
22 UNIDENTIFIED MEN IN BLACK AT THE CAFE ACROSS THE STREET,
23 AT THE CONDO COMPLEX WHO WERE NEVER IDENTIFIED, WHO WERE
24 NOT CORROBORATED BY THE CLEAR AND CONVINCING EVIDENCE.

25 THERE WERE STATEMENTS MADE THAT PEOPLE WERE
26 SURVEILLING HER BY TAKING HER PICTURE, BY WATCHING HER
27 MOVEMENTS AT THE PUBLIC PLACE, THE CAFE, BUT THERE WAS
28 INSUFFICIENT EVIDENCE UNDER THE CLEAR AND CONVINCING

1 STANDARD TO CONNECT ANY OF THESE UNKNOWN, UNNAMED
2 INDIVIDUALS TOWARD CONDUCT THAT MR. OLSON ENGAGED
3 DIRECTLY OR INDIRECTLY THROUGH OTHERS TO PROVE HARASSMENT
4 OR SURVEILLANCE OR FOLLOWING OR STALKING.

5 THE CONDUCT OF THE PEOPLE WHO WERE CAPTURED
6 ON VIDEO AT THE COMPLEX EITHER IN THE BACK WALKWAY AREA
7 WHERE THERE WERE MORE THAN ONE ENTRANCES TO UNITS
8 ADJACENT TO THE EMPTY LOT, THE INDIVIDUALS SHOWN ON THAT
9 VIDEO AND THE VIDEO OF THE COURTYARD AREA SEEMINGLY
10 IDENTIFYING THE SAME INDIVIDUALS, THOSE WERE NOT SHOWN BY
11 CLEAR AND CONVINCING EVIDENCE TO BE PERSONS WHO WERE
12 EITHER DIRECTLY OR INDIRECTLY HIRED BY MR. OLSON TO
13 SURVEIL, HARASS, OR CREATE EMOTIONAL DISTRESS AGAINST
14 MS. ██████████.

15 IN FACT, THIS IS WHY I EMPHASIZE THE
16 LEGITIMATE PURPOSE LANGUAGE. THERE WAS SUFFICIENT CLEAR
17 AND CONVINCING EVIDENCE THAT THESE PERSONS WERE THERE FOR
18 A LEGITIMATE PURPOSE WHICH WAS TO REVIEW THE PROPERTY IN
19 THE BASEMENT OUT OF CAMERA VIEW AND ON THE AREAS UNDER
20 THE HOUSE WHERE THE VIDEO CAPTURED THEM LOOKING TO
21 INVESTIGATE THE FEASIBILITY OF CONSTRUCTING A BUILDING ON
22 THE ADJACENT EMPTY LOT. THIS WAS A LEGITIMATE PURPOSE.

23 THERE WAS SUFFICIENT, CLEAR AND CONVINCING
24 EVIDENCE THAT THERE WAS PRIOR NOTICE TO THE OWNERS OF THE
25 UNITS THAT THESE PEOPLE WOULD BE COMING THERE AND THAT
26 THEY WOULD BE CONDUCTING THIS SITE VISIT. THEY DID SERVE
27 A LEGITIMATE PURPOSE. IT'S NOT HARASSING. IT DID NOT
28 MEET THE BURDEN OF PROOF IN SHOWING CLEAR AND CONVINCING

1 EVIDENCE OF HARASSMENT, SURVEILLANCE AGAINST
2 MS. [REDACTED].

3 SO WHILE SHE MAY HAVE FELT THAT THESE
4 PERSONS WERE RUMMAGING THROUGH HER BELONGINGS, THE
5 EVIDENCE DID NOT SHOW THAT BY CLEAR AND CONVINCING
6 EVIDENCE.

7 MR. FOTSO'S PRESENCE CAN ALSO BE EXPLAINED
8 AS PERHAPS ALARMING THESE INDIVIDUALS WHO DID NOT
9 RECOGNIZE HIM AS A RESIDENT OF THE PREMISES.

10 NEVERTHELESS, HE WAS APPROPRIATELY CHECKING OUT THE
11 SITUATION. BUT IT DOES NOT SHOW THAT IT WAS HARASSMENT
12 PLACING MS. [REDACTED] IN REASONABLE FEAR FOR HER SAFETY.

13 THE ATTEMPTED BREAK-INS AT MS. [REDACTED]'S
14 RESIDENCE THROUGH THE WINDOW, THROUGH THE DOOR. AGAIN, I
15 FOUND THAT THE EVIDENCE DID SHOW THAT THERE WAS DAMAGE TO
16 THE WINDOW. MR. ROTH, THE HANDYMAN, TESTIFIED TO THAT.
17 THAT WAS CONVINCING. THAT WAS CLEAR. THAT WAS
18 UNCORROBORATED, THAT IS, NO ONE ELSE CHALLENGED THAT. SO
19 I FOUND THAT TO BE CREDIBLE, RELIABLE.

20 BUT, AGAIN, THERE WAS INSUFFICIENT EVIDENCE
21 BY CLEAR AND CONVINCING EVIDENCE THAT MR. OLSON WAS
22 RESPONSIBLE FOR THE DAMAGE TO THE WINDOW, THE DOOR, THE
23 LATCH, ANY ALLEGED OR ATTEMPTED BREAK-INS. THERE WAS
24 SOME EVIDENCE RECEIVED DURING THIS HEARING THAT THERE HAD
25 BEEN PEOPLE WHO HAD TRIED TO BREAK INTO UNITS AT THE
26 COMPLEX. AND SO THERE COULD BE ANOTHER EXPLANATION FOR
27 THAT. THERE WAS INSUFFICIENT EVIDENCE TO LINK IT UP WITH
28 MR. OLSON BY THE STANDARD OF CLEAR AND CONVINCING

1 EVIDENCE.

2 THE TEMPORARY RENTER AND THE PRESENCE OF
3 MR. FOTSO IN MS. ██████████'S UNIT DOES NOT RISE TO THE
4 LEVEL OF PEOPLE WHO WERE THERE TO HARASS OR SURVEIL
5 MS. ██████████. THEIR PRESENCE, THAT IS, THE PRESENCE OF
6 THIS TEMPORARY RENTER AND MR. FOTSO THEMSELVES ARE THE
7 SUBJECT OF A DISPUTE IN THE CIVIL COURT WHICH IS THE
8 AUTHORIZED USE OF THE ██████████ UNIT FOR RENTERS. THAT IS
9 A POINT OF LEGAL DISPUTE IN THE WEST DISTRICT CIVIL CASES
10 THAT ARE STILL PENDING. THEIR PRESENCE DOES NOT LEND
11 ITSELF BY CLEAR AND CONVINCING EVIDENCE TO A CONCLUSION
12 THAT THERE WAS SURVEILLANCE OR OBSERVATION OF
13 MS. ██████████ BEING CONDUCTED.

14 THE EVIDENCE ABOUT MR. MIRAMONTES BEING AT
15 THE PREMISES AND MR. OLSON BECOMING ANGRY AT HIM DOES NOT
16 AMOUNT TO HARASSMENT. IT ALSO RELATES TO THE 2015 EVENTS
17 WHICH WERE RESOLVED BY THE PARTIES' SETTLEMENT AGREEMENT.
18 AND IT WAS ALSO SHOWN BY THE COURT TO BE REFLECTIVE OF AN
19 ADVERSE CREDIBILITY OF MS. ██████████ WHEN SHE ALMOST USED
20 THE EXACT SAME LANGUAGE IN THE INSTANT APPLICATION THAT
21 SHE USED IN HER 2015 APPLICATION, AN ATTEMPT TO
22 RE-LITIGATE THOSE ISSUES WHICH WERE RESOLVED.

23 SHE MAY HAVE FELT THAT SHE WAS UNDER
24 SURVEILLANCE. SHE MAY HAVE FELT EMOTIONAL UPSET BECAUSE
25 OF EVENTS. BUT IT'S ALSO EXPLAINED TO THIS COURT FROM
26 THE EVIDENCE BY THE ONGOING, VERY CONTENTIOUS CIVIL
27 LITIGATION INVOLVING THE PARTIES' UNDERLYING CLAIMS IN
28 CIVIL COURT AND BEFORE THE FAIR EMPLOYMENT AND HOUSING

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1 BOARD.

2 THESE THINGS ARE VERY EMOTIONAL TO THE
3 PARTIES. THEY ARE HOTLY CONTESTED IN THE CIVIL COURTS.
4 THEY ARE PERHAPS EVEN RELATED TO THE CONDUCT OF THIS
5 LITIGATION. BUT THIS IS WHERE THE ALLEGED FEELING OF
6 INSECURITY COMES FROM BY THE EVIDENCE THAT THE COURT
7 ASSESSES, BY THAT LITIGATION PROCESS AND NOT BY THE
8 ACTIONS OF MR. OLSON BY CLEAR AND CONVINCING EVIDENCE,
9 NOT BY MR. OLSON DIRECTLY, NOT BY MR. OLSON INDIRECTLY.

10 SO THE COURT DOES NOT APPLY A STANDARD OF
11 WHETHER THESE ARE HALF TRUTHS OR INFERENCES. THE COURT
12 REQUIRES THAT THERE BE CLEAR AND CONVINCING EVIDENCE AS
13 THE STATUTE DOES. AND MS. [REDACTED] DID NOT MEET THAT
14 BURDEN OF PROOF.

15 SHE WAS ASKED DURING HER TESTIMONY THE AREAS
16 OR THE REASONS FOR THE INSTANT RESTRAINING ORDER REQUEST.
17 AND SHE TESTIFIED THAT SHE HAS BEEN FOLLOWED BY THIRD
18 PARTIES, THAT SHE BELIEVED MR. OLSON HIRED THEM.

19 AGAIN, I'VE ALREADY STATED THAT I FIND
20 INSUFFICIENT EVIDENCE BY THE CLEAR AND CONVINCING
21 EVIDENCE STANDARD THAT THESE PERSONS WERE UNIDENTIFIED.
22 MR. MORENO, THE PERSON WHO THE PETITIONER, MS. [REDACTED],
23 HAD THE ABILITY TO BRING TO COURT AND DID EFFECTIVELY
24 SERVE A SUBPOENA ON AND WHO DID NOT SHOW UP. THIS IS A
25 WITNESS IN HER CONTROL. SHE HAD THE ABILITY TO PRODUCE
26 THE STRONGER EVIDENCE AND DID NOT. AND MR. MORENO DID
27 NOT MAKE HIMSELF AVAILABLE FOR CROSS-EXAMINATION OR TEST
28 OF HIS DECLARATIONS.

1 SO HIS EVIDENCE IN THE FORM OF HIS
2 DECLARATIONS, WHICH THE COURT RECEIVED OVER OBJECTION,
3 WAS VIEWED WITH DISTRUST.

4 FURTHER WHEN I GO TO THOSE MORENO
5 DECLARATIONS, THE STATEMENTS ABOUT PEOPLE FOLLOWING THAT
6 MR. MORENO OBSERVED ALSO CAN LOGICALLY BE CONCLUDED,
7 ALTHOUGH NOT SHOWN, LOGICALLY THAT MAYBE THEY WERE
8 FOLLOWING MR. MORENO FOR SOME REASON BECAUSE THEY
9 FOLLOWED HIM TO HIS HOUSE. THEY DID THINGS TO HIS
10 PROPERTY. THEY FOLLOWED HIM ON THE STREETS AND HIGHWAYS.
11 THEY THREATENED HIM WITH A WEAPON.

12 AGAIN, THE COURT CANNOT YET TEST THE
13 VERACITY OF THOSE STATEMENTS BECAUSE HE WASN'T HERE TO BE
14 CROSS-EXAMINED BY THEM. SO THEY WERE UNRELIABLE AND
15 UNSUBSTANTIATED, AND THEY FAIL TO MEET THE CLEAR AND
16 CONVINCING EVIDENCE STANDARD.

17 AND SO VIEWED TOGETHER, THE COURT DOES NOT
18 FIND SUFFICIENT EVIDENCE TO MS. ██████████'S FIRST
19 CONTENTION FOR THIS RESTRAINING ORDER REQUEST THAT PEOPLE
20 WERE FOLLOWING HER. IT DOES NOT MEET THE CLEAR AND
21 CONVINCING STANDARD. SHE NEXT STATED THAT SHE FILED THIS
22 RESTRAINING ORDER REQUEST BECAUSE MR. OLSON DISPARAGED
23 HER. AND WHEN THAT WAS DELVED INTO MORE, IT WAS VERY
24 RECENT IN TIME THAT THERE WERE DISCUSSIONS AND DIALOGUE
25 THAT SHE FOUND UPSETTING OR THAT UPSET HER EMOTIONAL
26 CALM.

27 BUT, AGAIN, THE COURT NOTES THAT IT WAS FOR
28 A LEGITIMATE PURPOSE THAT THIS DIALOGUE HAPPENED.

1 THERE'S AN ONGOING DISPUTE ABOUT HOMEOWNER ASSOCIATION
2 AND CC&R VIOLATIONS. THIS COURT IS NOT HERE TO SAY
3 WHETHER THOSE ARE TRUE OR NOT. THAT IS ENTIRELY THE
4 PROVINCE AND THE SCOPE OF THE CIVIL ACTIONS PENDING.

5 BUT THERE WAS EVIDENCE THAT THERE WERE
6 STATEMENTS MADE TO MS. [REDACTED] AT RECENT BOARD MEETINGS
7 AS RECENTLY AS TWO MONTHS AGO ABOUT PEOPLE WHO WERE NOT
8 ON THE PROPERTY THAT -- PEOPLE WHO WERE ON THE PROPERTY
9 THAT DID NOT BELONG THERE, EITHER UNKNOWN OR UNCONNECTED
10 TO MS. [REDACTED] OR RENTING HER UNIT ALLEGEDLY -- AND I'M
11 NOT SAYING IT'S TRUE OR NOT TRUE -- ALLEGEDLY IN
12 VIOLATION OF THE CC&R'S. AND THAT THERE WERE LEGITIMATE
13 REASONS FOR DISCUSSIONS AT BOARD MEETINGS AND IN LETTERS
14 AND IN LEGAL CORRESPONDENCE THAT MS. [REDACTED] MIGHT BE
15 VIOLATING THOSE AGREEMENTS, THOSE CONTRACTS.

16 THIS WAS NOT A VIOLATION OF THE SO-CALLED
17 MEDIATION AGREEMENT THAT THE PARTIES ENTERED INTO IN
18 DECEMBER, 2015, BECAUSE THESE COMMUNICATIONS ABOUT THE
19 SAFETY AND SECURITY OF THE PROPERTY ARE LEGITIMATE
20 PURPOSES, ARE APPROPRIATE PURPOSES, AND WERE NOT DESIGNED
21 TO SPECIFICALLY TARGET MS. [REDACTED].

22 IN FACT, THE FACT THAT CAMERAS ARE POSTED AT
23 AREAS OTHER THAN HER PROPERTY AND AROUND THE BUILDING
24 SHOW THE LEGITIMATE PURPOSE OF THOSE CAMERAS: TO RECORD
25 THE PROPERTY, TO MAKE SURE THAT PEOPLE AREN'T THERE WHO
26 DON'T BELONG THERE. LEGITIMATE PURPOSES. SAFETY
27 CONCERNS. AND NOT SHOWN BY CLEAR AND CONVINCING EVIDENCE
28 TO BE EITHER DISPARAGING TOWARDS MS. [REDACTED] OR

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1 VIOLATIVE OF HER PEACEFUL, LAWFUL ENJOYMENT OF HER
2 PROPERTY.

3 THEY WERE NOT HARASSMENT. THEY WERE NOT
4 CREDIBLE THREATS OF VIOLENCE. AND THEY DID NOT SHOW A
5 PATTERN OF COURSE OF CONDUCT.

6 THE COURT NOTES THAT IT WAS THE BURDEN OF
7 MS. ██████████ TO SHOW THAT THE VIDEO WAS ALTERED. NO ONE
8 COULD EXPLAIN WHY THERE WAS A FREEZE OF THE VIDEO. THE
9 COURT'S OBSERVATION OF THE VIDEO ALSO SHOWED THAT AT SOME
10 POINTS IT MOVED IN FEWER FRAMES PER SECOND THAN REALTIME
11 AND IN OTHER INSTANCES MOVED IN REALTIME. SO THESE
12 IRREGULARITIES IN THE VIDEO AS SHOWN TO THE COURT WAS NOT
13 EXPLAINED BY ANYONE AS TO WHY THAT WAS THE CASE. AND FOR
14 BOTH PARTIES, THE BURDEN TO SHOW THAT IS ON THE PERSON
15 WHO CLAIMS IRREGULARITY IN THAT VIDEO.

16 THE VIDEO WAS TAKEN FOR WHAT IT WAS. IT
17 SHOWED THE PEOPLE INVESTIGATING THE CONSTRUCTION. IT
18 DIDN'T SHOW ANYTHING ELSE. EXHIBIT 27 SHOWED PICTURES,
19 STILL PICTURES OF PERSONS AT THE PREMISES WHO WERE THERE
20 TO INVESTIGATE. IT DID NOT SHOW PEOPLE SURVEILLING,
21 HARASSING, OR GOING THROUGH THE ██████████ PERSONAL
22 CONTENTS BY CLEAR AND CONVINCING EVIDENCE. THEREFORE, IT
23 FAILS TO MEET THAT BURDEN.

24 SO TO HAVE DISCUSSIONS ABOUT THEM THAT
25 MS. ██████████ MAY HAVE FOUND TO BE WHAT SHE FELT
26 DISPARAGING IS NOT SUFFICIENTLY SHOWN BY THE EVIDENCE.

27 SHE ALSO STATED THAT THERE WAS A THREAT TO
28 HER IN MARCH OF 2017 TO DROP HER CIVIL LAWSUIT OR THAT

1 HARM WOULD COME TO HER. AND SHE STATED THAT THIS WAS
2 STATED TO HER BY ATTORNEY LE WHO WAS PRESENT THROUGHOUT
3 THE CASE. AND IT WASN'T UNTIL THE END OF THE CASE THAT
4 HE WAS CALLED AS A WITNESS. THE COURT NOTES THAT THESE
5 ALLEGATIONS WERE NOT IN ANY OF THE PAPERS OF
6 MS. [REDACTED]. AND MR. LE HAD THE BENEFIT, EVEN THOUGH
7 THE COURT HAD A WITNESS EXCLUSION ORDER THROUGHOUT THESE
8 HEARINGS, OF WATCHING THE TESTIMONY, OF WATCHING THE
9 VIDEOS. AND THEN AT THE END OF THE PRESENTATION, IT WAS
10 A THROW-IN THAT MR. LE ALSO MADE A THREAT ON THE LIFE OF
11 MS. [REDACTED].

12 AND THIS WAS INTERESTING BECAUSE THIS WAS
13 THE MOST SUCCINCT, CLEAR EVIDENCE OF A THREAT TO THE
14 SAFETY OF MS. [REDACTED]. AND IT WASN'T STATED IN ANY FORM
15 UNTIL ALMOST THE CONCLUSION OF THIS HEARING. THAT CAUSES
16 THIS COURT TO TREAT IT WITH A GREAT DEAL OF SKEPTICISM.

17 EVIDENCE CODE 412 AND 413 ALLOW THE COURT TO
18 DRAW INFERENCES OR CONCLUSIONS. IF YOU HAVE STRONGER
19 EVIDENCE AND DON'T PRODUCE IT AND IT'S WITHIN YOUR POWER
20 TO PRODUCE IT, THE COURT CAN VIEW THE PRESENTATION OF
21 THAT EVIDENCE WITH DISTRUST. THE COURT VIEWED THE LE
22 EVIDENCE OF HIS ALLEGED THREAT WITH DISTRUST. AND I
23 FOUND THAT DID NOT MEET THE CLEAR AND CONVINCING EVIDENCE
24 STANDARD.

25 THE SAME THING WITH THE MEN IN BLACK
26 IDENTITY AND THE MORENO EVIDENCE FROM HIS DECLARATIONS.
27 IT'S MORE PERSUASIVE. IT'S MORE CLEAR AND CONVINCING IF
28 THOSE PEOPLE ARE IDENTIFIED, IF THE 14 MONTHS OF DELAY

1 FROM THE FILING UNTIL THIS HEARING PRODUCED SOME
2 PRESENTATION OF INDIVIDUALS WHO ARE IDENTIFIED AS THE
3 SO-CALLED MEN IN BLACK.

4 THE INABILITY, THE FAILURE TO DO THAT CAUSES
5 THE COURT TO TREAT THAT EVIDENCE WITH SKEPTICISM WITH A
6 DEGREE OF LACK OF CREDIBILITY SUCH THAT IT DOES NOT
7 SUPPORT THE CLEAR AND CONVINCING EVIDENCE STANDARD THAT
8 MS. ██████████ MUST MEET.

9 IN THE RESPONDENT'S CLOSING ARGUMENT,
10 MR. OLSON'S ATTORNEY'S CLOSING ARGUMENT, ADDITIONAL
11 FACTS, ADDITIONAL EVIDENCE WAS POINTED OUT AS FURTHER
12 INSTRUCTIVE TOWARD THE COURT CONCLUSION THAT THE BURDEN
13 OF PROOF WAS NOT MET.

14 AND THE LOCKBOX WAS ONE OF THOSE PIECES OF
15 EVIDENCE. AGAIN, THE COURT DID NOT ENTIRELY UNDERSTAND
16 WHY I WAS HEARING ABOUT THE LOCKBOX. CERTAINLY IF
17 SOMEONE DIRECTLY OR INDIRECTLY CAUSES DESTRUCTION OF
18 PROPERTY TO A PERSON WHEN THERE IS NO LEGITIMATE PURPOSE
19 FOR SAME, THAT CAN BE HARASSMENT. THAT CAN BE GROUNDS
20 FOR ONE FEELING THAT THEY ARE IN REASONABLE THREAT FOR
21 THEIR SAFETY, THAT IT'S A COURSE OF CONDUCT DESIGNED TO
22 INTIMIDATE, THREATEN, OR HARASS. AND IT DOESN'T SERVE A
23 LEGITIMATE PURPOSE.

24 HOWEVER, IN THIS CASE, THE EVIDENCE WAS MORE
25 PERSUASIVE THAT THE PRESENCE OF THE LOCKBOX WAS DUE TO
26 THE HOMEOWNER ISSUE DISPUTES THAT ARE BEING LITIGATED IN
27 THE WEST DISTRICT CIVIL CASES. THE USE OF KEYS TO THE
28 PREMISES BY AIRBNB RENTERS OR CUSTOMERS, IF YOU WILL, THE

1 SECURITY PROBLEMS THAT THAT CAUSES. MR. FOTSO'S CREDIBLY
2 TESTIFIED THAT THIS OTHER RENTER, WHETHER HE WAS A RENTER
3 OR AIRBNB CUSTOMER, WAS GOING THROUGH HIS STUFF.
4 INADVERTENTLY CAME INTO HIS ROOM ONE DAY. THESE ARE
5 LEGITIMATE CONCERNS, SECURITY CONCERNS.

6 AND THERE WAS TESTIMONY THEN FROM MS. MONROY
7 THAT THE BOX WAS REMOVED TO CARRY OUT THE LEGITIMATE
8 PURPOSE OF ADDRESSING IT IN THE CIVIL ACTION. WHETHER IT
9 ULTIMATELY WAS APPROPRIATE TO DO THAT OR NOT IS NOT FOR
10 THIS COURT TO DECIDE. BUT WHEN IT COMES TO WHETHER THIS
11 WAS EVIDENCE OF HARASSMENT, THE COURT CONCLUDES THAT IT
12 WAS NOT BECAUSE IT DOES NOT FORM THE COURSE OF CONDUCT,
13 DOES NOT FORM THE CREDIBLE THREAT OF VIOLENCE. IT
14 RELATES TO THE CIVIL CASES AND SHOULD BE ADDRESSED IN THE
15 CIVIL CASES.

16 I WAS CONCERNED ABOUT MR. FOTSO'S
17 CREDIBILITY. HE IS A VERY GENUINE, STRAIGHTFORWARD,
18 PLAIN SPEAKING PERSON WHO TESTIFIED CREDIBLY ABOUT
19 MATTERS THAT WOULD OTHERWISE NOT SUPPORT MS. [REDACTED].
20 HIS PRESENCE AS OCCUPANT OF THE UNIT WHEN HE MAY NOT HAVE
21 BEEN AUTHORIZED. HIS PRESENCE TO CHECK OUT WHY PEOPLE
22 WHO AREN'T USUALLY AT THE PREMISES ARE THERE. THAT IS
23 TOTALLY LEGITIMATE. AND I FOUND HIM TO BE CREDIBLE AND
24 RELIABLE THERE.

25 BUT I WAS CONCERNED THAT HE ALSO SAID THAT
26 HE HAD BEEN THE SUBJECT OF SURVEILLANCE AND FOLLOWING
27 FROM HIS FORMER WIFE. ALTHOUGH HE SAID ON THE WITNESS
28 STAND THAT'S NOW CONCLUDED, THERE IS ALSO AN EXPLANATION

1 FOR WHAT HE OBSERVED POSSIBLE THAT THOSE PEOPLE WHO ARE
2 SUPPOSEDLY SURVEILLING AROUND OR LOOKING AT HIM ARE
3 LOOKING AT HIM AND NOT MS. [REDACTED]. AND THAT CONNECTION
4 TO MR. OLSON EITHER DIRECTLY OR INDIRECTLY WAS NOT
5 SUFFICIENTLY PROVEN BY MR. FOTSO THROUGH CLEAR AND
6 CONVINCING EVIDENCE.

7 IN ALL, THE COURT IS AT A PLACE IN VIEWING
8 MS. [REDACTED]'S EVIDENCE IN APPLYING THE CLEAR AND
9 CONVINCING STANDARD TO HER CASE. I DON'T USE THE
10 HYPERBOLE OF CONSPIRACY OR PARANOIA. I THINK SHE FEELS
11 AND I WAS CREDIBLY PERSUADED THAT SHE FEELS SOMEONE IS
12 WATCHING HER OR FOLLOWING HER. BUT THE EVIDENCE DOES NOT
13 CONNECT IT TO MR. OLSON EITHER DIRECTLY OR INDIRECTLY.
14 IT DID NOT CORROBORATE. IT DID NOT MEET THE CLEAR AND
15 CONVINCING STANDARD.

16 AND SO WHEN THE COURT ASSESSES
17 MS. [REDACTED]'S CASE, IT COMES TO THE FOLLOWING
18 CONCLUSION: THAT SHE HAS NOT MET HER BURDEN OF PROOF BY
19 CLEAR AND CONVINCING EVIDENCE; AND, THEREFORE,
20 MS. [REDACTED]'S REQUEST FOR RESTRAINING ORDERS AND A
21 PERMANENT CIVIL HARASSMENT INJUNCTION IS DENIED.

22 THE COURT NEXT TURNS TO MR. OLSON'S SEPARATE
23 BUT HEARD AT THE SAME TIME REQUEST FOR A CIVIL HARASSMENT
24 RESTRAINING ORDER. I AGREE WITH MR. KENNEDY'S ARGUMENT
25 THAT IT IS MORE CONCISELY BASED ON DISCREET INDIVIDUAL
26 ACTS SURROUNDING THE DAY THAT A PROCESS SERVER OR A
27 PERSON OVER THE AGE OF 18, BY MY VIEW OF THE VIDEO,
28 EXHIBIT GG, SHOWED WAS PRESENT TO DELIVER PAPERS RELATED

1 TO THE INSTANT CIVIL HARASSMENT CASE.

2 MR. OLSON VIDEOED OR RECORDED FROM HIS
3 TELEPHONE THE ENCOUNTER OR A PORTION OF THE ENCOUNTER.
4 AND THE COURT ALWAYS -- THE COURT HERE VIEWED, AS IT
5 USUALLY DOES, THESE TYPES OF VIDEOS WITH SOME DEGREE OF
6 SKEPTICISM. JERKY IMAGES. THE FACT THAT THERE'S AN
7 EVENT THAT USUALLY OCCURS BEFORE THE VIDEO STARTS THAT
8 TRIGGERS SOMEONE TO RECORD THE VIDEO. THAT TRIGGERING
9 EVENT IS NOT RECORDED. AND THAT IS PART OF THE CLEAR AND
10 CONVINCING STANDARD WHERE THERE'S A LINE OF PEACE AND
11 QUIET AND THEN ALL OF A SUDDEN AN OUTBURST. THERE'S MORE
12 PERSUASIVE EVIDENCE THAT SOMETHING HAS HAPPENED TOWARDS
13 HARASSMENT.

14 WHAT THE VIDEO DID SHOW, EXHIBIT GG, IS THAT
15 A PERSON WALKED UP TO MR. OLSON AND HANDED HIM PAPERS AND
16 LEGALLY AND PROPERLY AND PEACEFULLY SERVED HIM WITH
17 PROCESS. THERE WAS A VERY BRIEF MOMENT AT THE DOORWAY
18 WHEN IT APPEARED THAT THIS THIRD PERSON CAME INTO THE
19 PREMISES FOR A BRIEF MOMENT AND THEN STEPPED AWAY.

20 THERE IS EVIDENCE ON THAT VIDEO OF MR. FOTSO
21 WALKING TOWARD THE CAMERA AS IF IN A MANNER THAT WOULD
22 PERHAPS LEND ITSELF TOWARD MORE CONCERN IN MR. OLSON FOR
23 HIS SAFETY. BUT THE VIDEO DOES NOT SHOW SUFFICIENTLY BY
24 CLEAR AND CONVINCING EVIDENCE THAT MR. FOTSO CAME UP TO
25 MR. OLSON AND DID ANYTHING THAT WAS THREATENING,
26 HARASSING, OR WHICH PLACED HIM IN IMMEDIATE FEAR FOR HIS
27 SAFETY.

28 TO BE SURE, THE VIDEO ALSO SHOWED

1 MS. ██████ FURTHER IN THE BACKGROUND WAVING HER ARM
2 TOWARDS THE CAMERA AS TO HAVE THOSE PERSONS WALK TOWARD
3 MR. OLSON. BUT INSUFFICIENT EVIDENCE OF ANYTHING OTHER
4 THAN MS. ██████ TELLING THOSE TWO INDIVIDUALS WHO WERE
5 WITH HER TO SERVE THE PAPERS ON MR. OLSON WHICH THE VIDEO
6 SHOWED AND WHICH THE EVIDENCE SHOWED MORE PERSUASIVELY
7 THAN NOT WAS DONE IN A PEACEFUL, LAWFUL MANNER.

8 THAT MR. OLSON WAS UPSET BY THE PROCESS,
9 THAT HE HAD EMOTIONAL DISTRESS OR FELT APPREHENSION OR
10 FEAR IN THOSE MOMENTS, I DO NOT DOUBT. I AM CERTAIN THAT
11 HAPPENED. AND HE WAS CLEAR AND CONVINCING TOWARD THAT
12 PERSUASIVE PROOF. BUT HE WAS NOT ABLE TO SHOW BY CLEAR
13 AND CONVINCING EVIDENCE THAT THERE WAS A CREDIBLE THREAT
14 OF VIOLENCE THAT SERVED NO LEGITIMATE PURPOSE.

15 THERE WAS A LEGITIMATE PURPOSE WHICH IS THE
16 SERVICE OF PROCESS. IT'S OFTEN DONE IN A VERY HIGHLY
17 EMOTIONAL MANNER. IT'S OFTEN DONE IN A MANNER WHICH
18 UPSETS THE NORMAL CALM OF ONE'S EVERYDAY LIFE. AND THE
19 PURPOSE OF THAT IS SO IF THAT HAPPENS AND IT'S DONE AND
20 PEOPLE GO BACK TO THEIR LIVES. AND IT IS EMOTIONAL. AND
21 THE COURT WAS PERSUADED THAT IS PROBABLY THE WAY
22 MR. OLSON FELT. BUT IT DID NOT RISE TO THE LEVEL OF
23 BEING CREDIBLE THREAT OF VIOLENCE OR HARM TO HIM NOR DID
24 IT SERIOUSLY ANNOY HIM OR THAT IT CAUSED HIM SEVERE OR
25 SUBSTANTIAL EMOTIONAL DISTRESS.

26 THE SECOND PART OF THAT INCIDENT WAS MORE
27 PROBLEMATIC AND DID COME CLOSER TO THE CLEAR AND
28 CONVINCING STANDARD WHICH WAS THAT, AFTER MR. OLSON AND

1 MR. ECONN LEFT THE PREMISES AND GOT INTO THE CAR, AN
2 INDIVIDUAL CAME UP TO A WINDOW OF THE CAR AND, WITH SOME
3 DEGREE OF FORCE, PLACED A PIECE OF PAPER ON THE CAR
4 WINDOW WHICH BY SOME MEASURE STUCK ON THE WINDOW OR WAS
5 LODGED IN THE RUBBER MOLDING AROUND THE WINDOW AND STAYED
6 ON THE WINDOW AS THE CAR DROVE AWAY CARRYING MR. ECONN
7 AND MR. OLSON.

8 UPON STOPPING THE CAR AND RETRIEVING THE
9 PAPERS, THE EVIDENCE SHOWED THAT IT REALLY HAD NO CONTENT
10 ON IT THAT WAS TOWARD SERVICE OF PROCESS. THE COURT CAME
11 CLOSE TO BUT FINDS THAT THIS WAS NOT CAUSING MR. OLSON TO
12 BE SERIOUSLY ANNOYED, SERIOUSLY IN EMOTIONAL DISTRESS TO
13 THE CLEAR AND CONVINCING STANDARD.

14 IT WAS A NUISANCE. IT WAS A BOTHER. BUT HE
15 MOVED ON FROM THAT SITUATION. AND THERE'S BEEN NO OTHER
16 ACTIVITY OTHER THAN THAT WHICH I DESCRIBED THAT FORMED
17 THE BASIS OF MR. OLSON'S REQUEST FOR CIVIL HARASSMENT
18 RESTRAINING ORDERS AND INJUNCTION. EXCEPT FOR THE EVENTS
19 ON THE DATE OF SERVICE OF PROCESS WHICH NOT DONE
20 ARTFULLY, NOT DONE WITH PROFESSIONALISM, BUT NOT DONE TO
21 THE PLACE WHERE THAT SHOULD JUSTIFY A CIVIL HARASSMENT
22 RESTRAINING ORDER.

23 AS I SAY, WITH THIS RESTRAINING ORDER THAT
24 MR. OLSON FILED, HE'S INVOLVED IN WHAT COULD BE
25 DESCRIBED -- AGAIN, I ONLY USE MY WORDS THAT DON'T EVEN
26 COME CLOSE TO APPROACH TO THE WAY THE PARTIES AND
27 ATTORNEYS MAY FEEL ABOUT WHAT IS HAPPENING IN THE CIVIL
28 CASES. BUT IT'S A GREAT DEAL OF INCONVENIENCE. IT'S A

1 GREAT DEAL OF RESOURCES AND TIME AND FRUSTRATION AND
2 UPSET BEING EXPENDED TOWARD THAT CIVIL LITIGATION. BUT
3 THE CONDUCT SURROUNDING IT THAT MAKES THE BASIS OF THESE
4 REQUESTS DOES NOT RISE TO THE LEVEL OF PLACING THE
5 PARTIES IN SEVERE OR SUBSTANTIAL EMOTIONAL DISTRESS, FEAR
6 FOR IMMEDIATE PHYSICAL HARM, SERIOUS HARASSMENT OR
7 ANNOYANCE.

8 THEY ARE THE STUFF OF YOUR DECISION TO
9 ENGAGE THE CIVIL LITIGATION IN SUCH A MANNER THAT EVERY
10 TURN IS AN AFFRONT, THAT EVERY CONFLICT IS -- OR EVERY
11 DISAGREEMENT IS A CONFLICT THAT MERITS SOME ONE-UPMANSHIP
12 IN THE PROCESS. IT JUST DOES NOT WORK THAT WAY. IT'S
13 LITIGATION. AND IT'S WHY I EMPHASIZE THE CIVILITY OF
14 THIS PROCESS AND REWARD YOU FOR RESPECTING THAT CIVILITY
15 BECAUSE THAT IS WHAT YOU HAVE TO DO.

16 WHEN YOU'RE AT THE COMPLEX, YOU BOTH HAVE A
17 PEACEFUL RIGHT OF ENJOYMENT, A RIGHT OF COMING AND GOING
18 TO THOSE PREMISES. AND IF YOU SEE ONE ANOTHER, YOUR JOB
19 IS TO TURN AND GO THE OTHER WAY OR DIVERT YOUR PATH, NOT
20 SAY A WORD, NOT LOOK, NOT ENGAGE. BUT TO GO PEACEFULLY
21 AND LAWFULLY TO YOUR PLACE. AND WHATEVER OUTCOME YOUR
22 CIVIL ACTIONS MAY HAVE, THAT IS THE OUTCOME. THAT IS
23 WHAT YOU HAVE TO LIVE WITH.

24 PERSONS HAVE A RIGHT TO PEACEFULLY AND
25 LAWFULLY ENJOY THEIR PROPERTY AND ENJOY THEIR LIVES AND
26 MOVE ABOUT IN PUBLIC OR IN PRIVATE WITHOUT ANY CONCERN
27 FOR BEING WATCHED. CIVIL HARASSMENT RESTRAINING ORDERS
28 ARE DESIGNED TO ADDRESS THAT. BUT IT MUST BE DONE BY

1 CLEAR AND CONVINCING EVIDENCE.

2 AND SO ON MR. OLSON'S CASE, I ALSO FIND THAT
3 HE DID NOT MEET THAT BURDEN OF PROOF. SO THE COURT SHALL
4 DENY MR. OLSON'S REQUEST FOR CIVIL HARASSMENT RESTRAINING
5 ORDERS AS WELL.

6 SO BY CONCLUSION, BOTH PARTIES HAVE NOT MET
7 THEIR BURDEN OF PROOF BY CLEAR AND CONVINCING EVIDENCE.
8 AND BOTH RESTRAINING ORDER REQUESTS ARE DENIED.

9 THOSE ARE THE ORDERS OF THE COURT. THEY
10 WILL GO INTO THE MINUTES OF THE COURT. AND THE MINUTE
11 ORDER WILL BE MAILED TO EACH COUNSEL OF RECORD IN BOTH
12 CASES AND BECAUSE YOU NEED TO HAVE ALSO THAT LANGUAGE
13 REGARDING THE RELEASE OF THE MORENO BENCH WARRANT AS
14 WELL.

15 THE COURT REPORTER HAS MADE A RECORD OF MY
16 FINDINGS STATED ON THE RECORD. THAT CONCLUDES THE CASE.
17 AGAIN, I THANK YOU. SO WE ARE FINISHED. AND YOU'RE OFF
18 TO CIVIL CASES.

19 I ONLY SAY ONE LAST, IF YOU WILL, FINAL WORD
20 TO YOU BOTH AND ALL. AS I SAID, IT'S OF UTMOST
21 IMPORTANCE THAT YOU RESPECT EACH OTHER FOR THE STRONG
22 POSITIONS THAT HAVE YOU ABOUT YOUR CIVIL CASE TO ALLOW
23 THE OTHER PERSON TO STATE HIS OR HER CLAIM OR CLAIMS IN
24 THAT COURT AND LET THAT TRIBUNAL DECIDE YOUR CASE WITHOUT
25 THE EMOTION. YOU MUST SEPARATE THAT FROM YOUR DAILY
26 CONDUCT. YOU MUST SEPARATE THAT FROM YOUR MOVEMENTS.

27 YOU HAVE MORE IMPORTANT ENDEAVORS TO ENGAGE
28 IN THAT DESERVES YOUR ATTENTION AND YOUR PASSION AND THAT

1 IS WHERE YOU SHOULD BE. UNDERSTAND THAT THESE ARE THE
2 DECISIONS ON THESE FACTS. AND THAT FURTHER CONDUCT ON
3 OTHER FACTS AND OTHER PROOF MAY HAVE A DIFFERENT RESULT.
4 BUT THESE MATTERS ARE NOW LITIGATED TO FINALITY.

5 AND SO I HOPE YOU TAKE TO HEART THE COURT'S
6 STATEMENT ABOUT HOW TO CONDUCT YOURSELVES WITH CIVILITY
7 AND DIGNITY AND DISTANCE. AND, AGAIN, THE COURT REMAINS
8 AVAILABLE IF EITHER ONE OR BOTH OF YOU DON'T DO THAT ON
9 NEW FACTS, DIFFERENT FACTS.

10 THANK YOU. WE ARE IN RECESS. ORDER TO
11 RELEASE THE EXHIBITS TO BOTH PARTIES.

12
13 (THE PROCEEDINGS WERE CONCLUDED.)
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SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Family Division

Van Nuys East Dept. - D

██████████
██████████, ██████████
vs
Olson, Curtis

November 19, 2018
8:30 AM

Honorable Michael J. Convey, Judge

Roxana Duron, Judicial Assistant

Marlene Burris (#8424), Court Reporter
Adrian Zuniga, Deputy Sheriff

NATURE OF PROCEEDINGS: Petition - Civil Harassment filed by Petitioner on September 6, 2017

The following parties are present for the aforementioned proceeding:

██████████, Petitioner
Curtis Olson, Respondent
Benjamin Kanani, Attorney for Petitioner
Eric Kennedy, Attorney for Respondent
Ryan A. Volt-Lowell, Attorney for Respondent

The matter is called for hearing.

The hearing resumes from November 16, 2018, with both parties and counsel present.

██████████ and Curtis Olson present closing arguments.

The matter is now submitted.

The Court previously issued a bench warrant as Amado Moreno. The Bench Warrant previously issued but not released because the requesting party failed to pay the fee to the Sheriff's Department, therefore, the bench warrant and the bail set as to Amado Moreno is ordered recalled and quashed.

Having found no basis for the issuance of a permanent restraining order, the Court hereby denies Petitioner's request. Any and all restraining orders are hereby dissolved.

Exhibits are ordered returned to respective parties in open court.

The case is ordered dismissed.

Clerk is to give notice.

**CLERK'S CERTIFICATE OF MAILING/
NOTICE OF ENTRY OF ORDER**

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

**Family Division
Van Nuys East Dept. - D**



vs

Olson, Curtis

November 19, 2018

8:30 AM

I, Sherri R. Carter, Executive Officer/Clerk of the above-entitled court, do hereby certify that I am not a party to the cause herein, and that on this date I served the Notice of Entry of the above minute order of November 19, 2018 upon each party or counsel named below by placing the document for collection and mailing so as to cause it to be deposited in the United States Mail at the courthouse in Van Nuys, California, one copy of the original filed/entered herein in a separate sealed envelope to each address as shown below with the postage thereon fully prepaid, in accordance with standard court practices.

Dated: November 29, 2018

By: /s/ Roxana Duron

Roxana Duron, Deputy Clerk

BENJAMIN KANANI
8730 WILSHIRE BLVD., STE. 411
BEVERLY HILLS, CA 90211

ERIC KENNEDY
1000 WILSHIRE BLVD., SUITE 1500
LOS ANGELES, CA 90017

CERTIFICATE OF SERVICE

(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 }
 }
COUNTY OF LOS ANGELES } ss.

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 October 27, 2021, at Los Angeles, California, I served the foregoing document entitled **REDACTED COURT RECORDS OF WHICH JUDICIAL NOTICE IS REQUESTED, VOLUME 1 OF 1, RJN 002–240** on each interested party in this action, as indicated on the attached Service List, as follows:

PLEASE SEE ATTACHED SERVICE LIST

BY TRUEFILING: I caused to be uploaded a true and correct copy of the document, in Portable Document Format (.pdf), through the Supreme Court of California’s electronic filing system (EFS) operated by ImageSoft TrueFiling (TrueFiling) under Cal. Rules of Court, rules 8.70 to 8.79, and I selected service of the document on the parties through the EFS system.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on October 27, 2021, at Los Angeles, in the County of Los Angeles, State of California.

/s/ Robert C. Little
Robert C. Little

SERVICE LIST

SUPREME COURT OF CALIFORNIA

No S258498

CALIFORNIA COURT OF APPEAL
SECOND APPELLATE DISTRICT, DIVISION EIGHT

No B286105

LOS ANGELES COUNTY SUPERIOR COURT

No SC126806

By TrueFiling

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STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **JANE DOE v.
OLSON**

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: **rlittle@buchalter.com**
3. I served by email a copy of the following document(s) indicated below:

Title(s) of papers e-served:

Filing Type	Document Title
BRIEF	S258498_AnswerAmicusBriefs_Olson
REQUEST FOR JUDICIAL NOTICE	S258498_RenewedRJV_Olson
ADDITIONAL DOCUMENTS	S258498_RJV_RedactedCourtRecords_Olson

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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.

10/27/2021

Date

/s/Robert Collings Little

Signature

Little, Robert Collings (182396)

Last Name, First Name (PNum)

Buchalter, A Professional Corporation

Law Firm