

1 Laura Owens

2 Scottsdale, AZ

3 Tel: [REDACTED]

4 Petitioner

ELECTRONICALLY

FILED

*Superior Court of California,
County of San Francisco*

07/23/2025

Clerk of the Court

BY: NOE CALIXTO

Deputy Clerk

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8 **SAN FRANCISCO COUNTY SUPERIOR COURT**
9 **STATE OF CALIFORNIA**
10

11 **In Re Matter of:**

Case No: FDV-18-813693

12 **LAURA OWENS,**

13
14 **Petitioner,**

**MOTION TO PROCEED BY
DECLARATION AND WAIVE LIVE
TESTIMONY PURSUANT TO FAMILY
CODE § 217 AND CRC 5.113**

15 **And**

16 **MICHAEL MARRACCINI,**

17
18 **Respondent.**

Hearing Date: Aug. 1, 2025

Time: 9:00 AM

Dept.: 405

19
20 Petitioner Laura Owens respectfully requests that this Court waive the requirement
21 for live testimony at the upcoming evidentiary hearing on her Request to Renew the
22 Domestic Violence Restraining Order (DVRO), pursuant to Family Code § 217(c),
23 California Rules of Court 1.100 and 5.113, and the Americans with Disabilities Act (42
24 U.S.C. § 12101 et seq.).
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1 Petitioner further requests that this motion be SEALED, pursuant to California
2 Rules of Court 2.550 and 2.551, due to the inclusion of confidential medical information
3 and escalating threats from a harassment group known as “Justice for Clayton.”
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6 **I. INTRODUCTION**

7 The case arises from a stipulated Domestic Violence Restraining Order (DVRO)
8 issued by this Court in 2018. After the initial order was violated by Respondent Michael
9 Marraccini, this Court renewed the order in 2020 for a period of five years.

10 Petitioner now alleges Mr. Marraccini committed multiple additional violations of
11 the renewed order, including traveling from California to Arizona in June 2024 for the
12 purpose of intentionally violating the order; a federal crime in violation of 18 U.S.C. §
13 2262. For that reason, Petitioner asks this Court for relief including extending the order
14 permanently, issuing an order to show cause why Respondent should not be held in
15 criminal contempt, and ordering that Respondent be referred for criminal prosecution.

16 For the reasons explained below, the requested relief is based on facts which are,
17 or should be, entirely undisputed. Respondent cannot (and presumably will not) deny that
18 in May 2024, he publicly released nearly 2,500 pages of private, confidential text
19 messages between the parties, and that he did so despite never being compelled or
20 permitted to do so by any court order, subpoena, or by any other legal requirement.
21 Further, Respondent cannot deny that in June 2024, he traveled from California to
22 Arizona with the intent to violate this Court’s order, and that he actually did violate this
23 Court’s order by coming within 300 feet of Petitioner.
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25 Because these facts are either undisputed or not subject to any good faith dispute,
26 there is no factual disagreement for this Court to resolve. Rather, any defense Respondent
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1 may raise presents purely a question of law – i.e., does Respondent have a valid legal
2 excuse for his actions?

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4 Because this case presents only legal disputes, not factual disputes, this Court
5 should exercise its discretion and exclude live testimony pursuant to Cal. Fam. Code §
6 217 and Rule 5.113, Cal. Rules of Court. Good cause exists for this request because the
7 material facts are *not* in controversy (see Cal. R. Ct. 5.113(b)(2)), live testimony is not
8 necessary for the court to assess either side’s credibility (*see id.* 5.113(b)(3)) and other
9 facts exist which would make live testimony unnecessary and inequitable.

10 11 **II. PROCEDURAL HISTORY & EXISTING ORDER**

12 The background facts of this matter are as follows:

13 • On August 3, 2018, Respondent stipulated to a two-year Domestic Violence
14 Restraining Order (DVRO) issued by the San Francisco Superior Court. Notably, no
15 evidentiary hearing was held because Respondent stipulated to the order.

16
17 • On September 11, 2020, the DVRO was renewed for an additional five
18 years following a hearing before the Honorable Judge Sharon Reardon, who found that
19 Petitioner continued to experience a reasonable apprehension of future abuse.

20 • On July 9, 2025, Petitioner filed a timely request to renew the DVRO again,
21 this time citing not only continued threats and harassment but new, egregious, and
22 federally prosecutable violations.

23 24 **III. RESPONDENT’S NEW VIOLATION(S) OF THE EXTENDED DVRO**

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1 On July 11, 2025, Petitioner filed a request asking this Court to renew the DVRO
2 permanently. This request was supported by declarations from Petitioner and her Arizona
3 counsel.

4
5 These declarations explained that in May/June 2024, while this Court's order
6 remained in effect, Respondent violated the order by traveling from California to Arizona
7 and coming within 300 feet of Petitioner in the parking lot of the Maricopa County
8 Superior Court in Phoenix. Petitioner alleges that by engaging in interstate travel with the
9 intent of violating this Court's order, Respondent committed a federal crime in violation
10 of 18 U.S.C. § 2262.

11 These declarations further explain that Respondent engaged in other, independent
12 violations of this Court's order by posting threatening messages on social media, by
13 releasing private information concerning Respondent and her family, and by engaging in
14 other threatening and harassing conduct which included publicly releasing 2,500 pages of
15 private text messages exchanged between the parties while they were dating in 2016–17
16 which contained private sexual and medical information. This conduct (which is all
17 undisputed) is *per se* sufficient to support the relief Petitioner seeks.

18 Indeed, for the reasons explained in *In re Marriage of Nadkarni*, 173 Cal.App.4th
19 1483, 93 Cal. Rptr. 3d 723 (Cal. App. 2009), Mr. Marraccini's conduct is, as a matter of
20 law, sufficient to grant the requested relief. *Nadkarni* involved an allegation that a former
21 romantic partner violated the Domestic Violence Protection Act (DVPA) (Fam. Code, §
22 6200 *et seq.*) by, among other things, accessing private emails of his former partner. The
23 trial court initially dismissed the petition, explaining such conduct: "may very well be
24 illegal, but I don't think that it rises to the level of conduct that is amenable to the
25 Domestic Violence Prevention Act." *Nadkarni*, 173 Cal.App.4th at 1493.

26 The Court of Appeal *reversed*, holding physical abuse and threats are not
27 necessary to support relief under the DVPA. Rather, other types of psychologic threats
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1 such as accessing/releasing private messages are sufficient; “the plain meaning of the
2 phrase ‘disturbing the peace of the other party’ in section 6320 may be properly
3 understood as conduct that destroys the mental or emotional calm of the other party.” *Id*
4 at 1487. The Court concluded with the following summary:

5
6 In the present case, we determine that the allegations in Darshana's
7 application and declaration are facially sufficient for a showing of abuse
8 within the meaning of the DVPA. We assume, without deciding the truth of
9 Darshana's allegations, that Datta's conduct included accessing, reading,
10 and publicly disclosing the content of Darshana's confidential e-mails, and
11 that his conduct caused her to suffer ‘shock’ and ‘embarrassment,’ In
12 other words, Datta's conduct with respect to Darshana's e-mail account, as
13 stated in her declaration, allegedly caused the destruction of her mental or
14 emotional calm and could, if found to be true, constitute "disturbing the
15 peace of the other party." (§ 6320) Since "disturbing the peace of the other
16 party" is a form of abuse within the meaning of the DVPA, we find that
17 Darshana's application and supporting declaration are facially sufficient

18 *Id.* at 1498–99 (emphasis added).

19 In conclusion, the Court of Appeals observed: “the trial court was not required to
20 allow oral testimony by Darshana's witnesses because the general rule is that ‘[t]he trial
21 court is empowered to determine motions upon affidavits, and has the discretion to refuse
22 oral testimony.’” *Id.* at 1499 (emphasis added).

23 For the same reasons described in *Nadkarni* and California Rule of Court 5.113,
24 this Court should refuse oral testimony and rule based solely on written submissions
25 including declarations/affidavits. This Rule provides in relevant part:

26 **Rule 5.113. Live testimony**

27 ...

28 **(b) Factors**

1 In addition to the rules of evidence, a court must consider the following factors in
2 making a finding of good cause to refuse to receive live testimony under Family
3 Code section 217:

4 ...

(2) Whether material facts are in controversy;

5 (3) Whether live testimony is necessary for the court to assess the credibility of
6 the parties or other witnesses;

7 (4) The right of the parties to question anyone submitting reports or other
8 information to the court;

9 ...

(6) Any other factor that is just and equitable.

10 Based on these standards, good cause exists for the Court to refuse to receive live
11 testimony for multiple reasons.

12
13 First, the primary facts supporting relief are (or will be) undisputed. Respondent
14 cannot dispute that he traveled from California to Arizona on June 10, 2024 and that he
15 violated this Court's order by coming within 300 feet of Petitioner. Because that fact is
16 undisputed, there is no need for this Court to receive live testimony with respect to that
17 event. The only relevant issue is whether Respondent has any *legal* defense for his
18 conduct. Live testimony is unnecessary for Respondent to explain his position or legal
19 arguments; he may submit a declaration and written briefing offering any explanation or
20 defense he believes proper.

21 Second, Respondent has openly admitted that he did *not* travel to Arizona for any
22 legitimate, lawful purpose. Indeed, just days after he violated this Court's order by
23 traveling to Arizona, Mr. Marraccini appeared in a 2 ½ hour interview in which he
24 admitted he knew he was not traveling for the purpose of testifying in court: "I knew I
25 wasn't going to be testifying. Her attorney definitely thought I was going to be
26 testifying." See https://youtu.be/nhdseYCE9WU?si=ZM55qOMg_WJnV3Oe&t=5802



Transcript

1:36:39 goes out to you um you know [REDACTED] wants to know did you think you would get to testify

1:36:46 in the short amount of time that there was no I knew I wasn't going to be

1:36:52 testifying I I her attorney definitely thought I was I was going to be

1:36:57 testifying I mean that's why I think he was doing everything he could to possibly um rattle me but I knew I knew

Respondent's disregard for this Court's DVRO did not end there. In that same June 19, 2024 interview with content creator Megan Fox, Mr. Marraccinni escalated his retaliation by publicly defaming Petitioner, misrepresenting the facts of the DVRO, and disclosing protected private health information.

1 Among other things, Mr. Marraccini stated:

- 2 ● “It’s [the stipulated DVRO] completely fabricated.” (Timestamp: 0:23:08)
- 3 ● “None of what she said actually happened. It’s all fiction.” (Timestamp:
- 4 0:23:20)
- 5 ● “There were times where I was definitely frustrated... but I was never
- 6 emotionally abusive or physically abusive.” (Timestamp: 1:01:07)
- 7

8 These statements are not mere opinion. They are deliberate denials of judicially
9 established findings. The San Francisco Superior Court issued the DVRO after reviewing
10 sworn evidence, including a declaration from Karen Ilmberger, a neutral third-party
11 witness who recounted a terrifying incident she witnessed on an international flight: “I
12 remember that Mr. Marraccini was emotionally and verbally abusing Ms. Owens for a
13 long time... He was so menacing that I felt her life was at stake were she to stay with
14 him.”

15 Furthermore, during the same interview, Respondent publicly disclosed
16 Petitioner’s sensitive mental health information: “She was threatening to harm herself.
17 That’s what we were dealing with.” (Timestamp: 0:45:12) This disclosure, made without
18 Petitioner’s consent and outside of any legal proceeding, constitutes retaliatory
19 psychological abuse, a prohibited form of conduct under California Family Code § 6320,
20 which defines abuse to include “harassing,” “disturbing the peace of the other party,” and
21 “releasing confidential information without consent.”

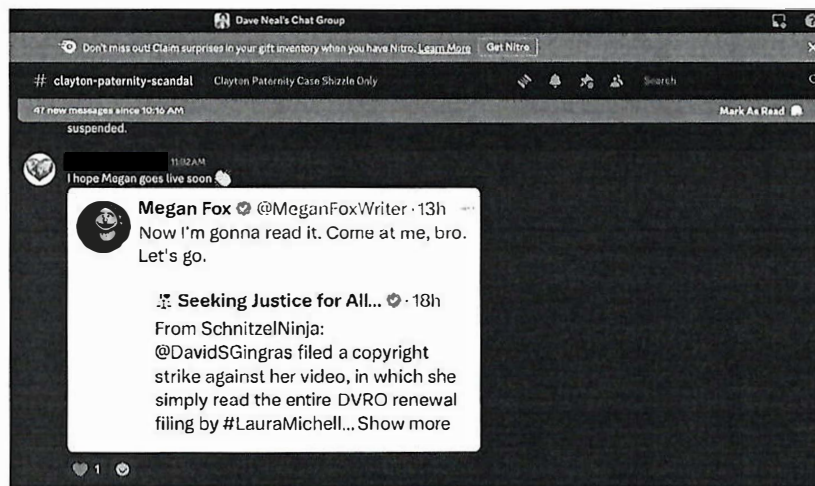
22 Respondent’s two-and-a-half-hour YouTube interview, in which he denied court-
23 validated findings, disclosed Petitioner’s mental health history, and mocked her
24 allegations, falls squarely within this prohibited conduct. That the abuse was committed
25 publicly, for the purpose of humiliating Petitioner to a wide audience, provides further
26 good cause for this Court to decline live testimony – because doing so will limit Mr.
27

1 Marraccini's ability to further abuse the legal system by harassing and attacking
2 Petitioner.

3
4 A third and final reason exists for this Court to refuse live testimony – because
5 Respondent is an active member in a cult-like organization called “Justice for Clayton” or
6 “JFC” which has been ruthlessly harassing and attacking Petitioner, her family, and her
7 attorney, for over two years. Following the filing of Petitioner’s paternity case against
8 former Bachelor star Clayton Echard in 2023, “Justice for Clayton” emerged as a group
9 devoted to retaliating against Petitioner and doing everything possible to destroy her.
10 Though the JFC group was formed initially to support Mr. Echard (the Respondent in the
11 Arizona paternity action filed by Petitioner), JFC members have actively inserted
12 themselves into matters unrelated to that case, including this proceeding.

13 Among other things, the JFC group has done the following:

- 14 • Obtained and widely disseminated Petitioner’s July 9, 2025 DVRO renewal
15 filing on social media within 24 hours of its submission to the Court, triggering a new
16 wave of targeted harassment and online ridicule against Petitioner.



- Members of the group referred to the Marraccini DVRO as “phony” and falsely cast Respondent as the “victim,” despite having no personal knowledge of the underlying facts or incidents that led to the issuance of the original order in 2018—well before the group’s formation in 2023.

Respondent has seized on this ignorance and worked exhaustively to frame himself as emotionally fragile and unfairly targeted, using sympathetic narratives to invite public support and cast Petitioner as the aggressor. One such narrative centers on a man he repeatedly described as his “dying stepfather” during the course of the relationship—a claim designed to evoke sympathy and humanize him to the online audience. In truth, this individual was his mother’s former boyfriend—not a legal or familial stepfather—and even Respondent once acknowledged the relationship’s hollowness, writing that:

iMessage
[1] 2017-03-29 19:14:08 (UTC)
Sender: Self (m.marraccini@gmail.com)
Participants: (415) 810-0604 ((415) 810-0604), Self (m.marraccini@gmail.com)

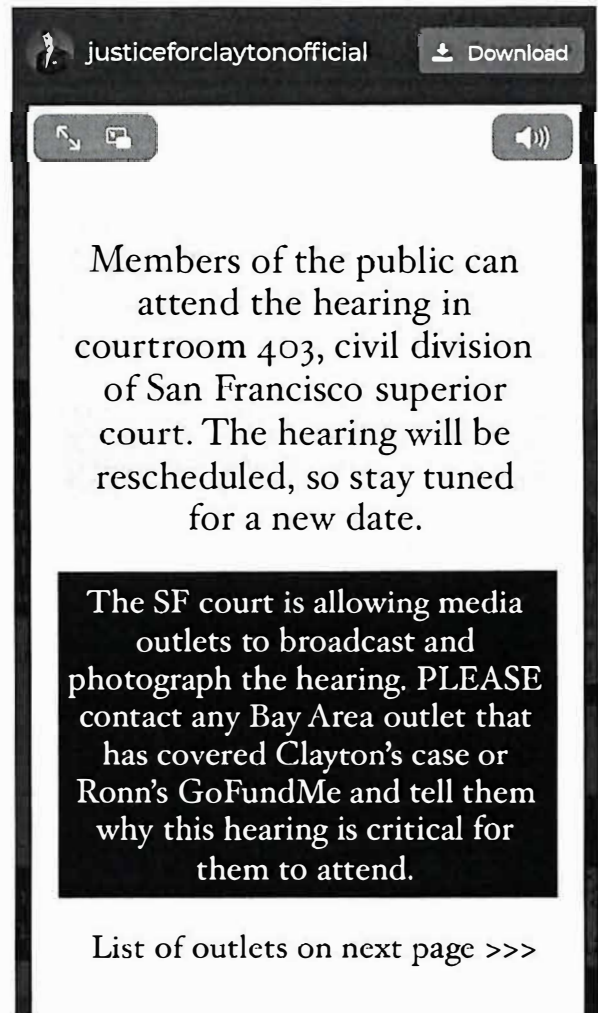
I'm alright. The funeral was yesterday and my mom was never mentioned once, so I feel bad for her

This selective and misleading framing is emblematic of Respondent's broader strategy of narrative manipulation: presenting himself as a wounded party to distract from a judicial record that does not support that claim. The "Justice for Clayton" group has seized upon these distortions, amplifying them as fact and using them as justification to vilify and harass Petitioner across multiple platforms.

- Organized in-person attendance at Petitioner's Arizona court hearing in June 2024, where more than 50 members showed up and have already begun organizing in-person support for Respondent at the August 1, 2025 hearing in San Francisco.

• JFC operates a network of social media and Internet resources devoted solely to attacking and harassing Petitioner. These pages include a primary Instagram account located at: <https://www.instagram.com/justiceforclaytonofficial/>, a Twitter account located at: <https://x.com/ClaytonsJustice>, and various websites including <https://victimsoflauraowens.com/> and <https://www.reddit.com/r/JusticeForClayton/>.

- Shortly after the renewal petition was filed in this matter, JFC's primary Instagram account began posing solicitations for coverage of this matter by local San Francisco news media, as well as inviting members of the general public to attend. These posts falsely state that this Court "is allowing media outlets to broadcast and photograph the hearing."



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4 • Respondent's sister, Stephanie [REDACTED], who regularly posts on Reddit
5 under the handle [REDACTED]," continues to engage in targeted harassment against
6 Petitioner and her family. Following Respondent's June 2024 interview with content
7 creator Megan Fox, Ms. [REDACTED] publicly applauded her brother, writing: "I'm so
8 grateful that your demeanor, truth, authenticity, and kindness are finally seen and
9 you're no longer silenced by manipulation and fear." This was more than a swipe at
10 Petitioner—it was a brazen misrepresentation of legal reality. Neither the San Francisco
11 Superior Court nor any other court modified the standing DVRO to permit Respondent
12 to speak freely about the protected party. Yet, both Respondent and his sister acted as
13 though the order had been lifted, weaponizing that false narrative to cast Petitioner as a
14 manipulative oppressor and Respondent as a silenced truth-teller. This deliberate
15 distortion not only undermines the authority of the Court but emboldens further
16 harassment by suggesting that court-ordered protections no longer carry weight.

17 Most recently, in June 2025, Ms. [REDACTED] commented on a Reddit thread
18 discussing a credit card lawsuit filed by JPMorgan Chase against Petitioner's elderly
19 parents—who have been struggling financially. Petitioner's father, who is 79 years old,
20 has lived with Parkinson's disease for 24 years and has survived four separate battles with
21 cancer. Despite this, Ms. [REDACTED] publicly mocked the situation, writing: "JP Morgan you
22 rock! Get this pathetic criminal family to pay their bills" and "it's getting real for these
23 tools," reflecting a level of cruelty that further underscores the vindictive and harmful
24 nature of the harassment tied to Respondent's support network.

25 These cumulative actions—coordinated online attacks, public dissemination of
26 confidential filings, personal humiliation of Petitioner and her family, and planned in-
27 person confrontations—create a real and immediate risk of retraumatization and
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1 psychological harm should Petitioner be required to testify live. The protective intent of
2 California's Domestic Violence Prevention Act (DVPA) would be completely
3 undermined by forcing a survivor to confront both her abuser and his coordinated support
4 network in a live public forum, especially when there is no legitimate reason for doing so.
5

6 7 **V. MEDICAL NECESSITY AND ADA ACCOMMODATION**

8 Petitioner respectfully submits that her medical diagnoses are supported by
9 verified treatment records and clinical assessments from multiple licensed medical
10 providers, including her psychiatrist at Spark Shift Psychiatry, neurology specialists at
11 Barrow Neurological Institute, and her physician at Banner Health. Barrow is
12 internationally recognized for its pioneering work in neurology and brain injury and
13 operates the only known Domestic Violence Brain Injury Program in the United States.
14 Petitioner was formally admitted to this program following the end of her relationship
15 with Respondent.

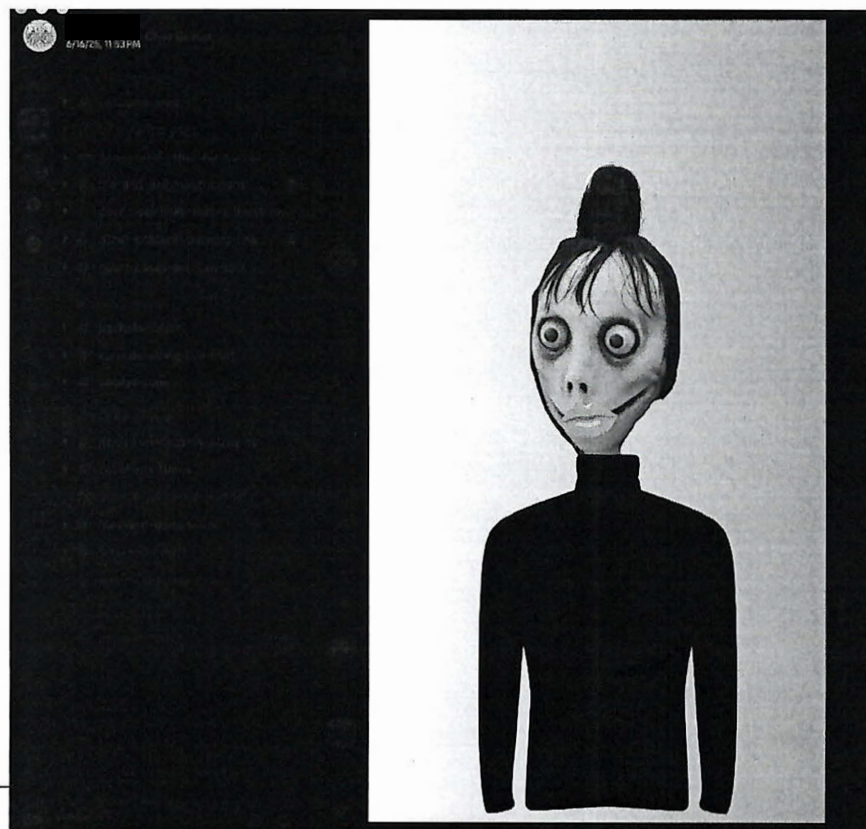
16 Petitioner's diagnoses include, but are not limited to:

- 17 • Autism Spectrum Disorder (ASD)
- 18 • Epilepsy
- 19 • Post-Traumatic Stress Disorder (PTSD)
- 20 • Traumatic Brain Injury (TBI)
- 21 • Panic Disorder
- 22 • Generalized Anxiety Disorder (GAD)
- 23
- 24

25 Most recently – and most urgently – Petitioner was recently diagnosed with the
26 most severe category of Anorexia Nervosa, binge-eating/purging type—the most critical
27 classification under the current diagnostic framework. As of July 17, 2025, she weighs
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1 83.3 pounds, placing her in a state of severe malnourishment and physical risk. This
2 condition is the most life-threatening of any psychiatric condition. It carries heightened
3 susceptibility to cardiac arrhythmia, hypotension, loss of consciousness, organ failure,
4 and significant cognitive impairment, especially under conditions of emotional duress –
5 exactly the conditions she would be subjected to in a live courtroom hearing, particularly
6 one involving her former abuser and a gallery of observers affiliated with a coordinated
7 online harassment group.

8
9 Petitioner has been the repeated target of vicious public ridicule and body-shaming
10 by the online harassment group known as “Justice for Clayton” (JFC), which has openly
11 aligned itself with Respondent and amplified his narrative through coordinated
12 defamation, targeted memes, and monetized outrage. Members of this group have
13 referred to Petitioner as a “horse-faced anorexic,” mocked her weight and medical
14 diagnoses, and disseminated dehumanizing content across Discord, YouTube, and Reddit.
15 A widely circulated meme dated June 14, 2025, exemplifies the kind of viral cruelty
16 Petitioner routinely endures:



Among the many JFC affiliates, content creator Lauren Neidigh warrants particular attention—not because she is the most popular or lucrative, but because she is the only individual who formally petitioned this Court for direct media access to the August 1, 2025 evidentiary hearing. Despite lacking any professional journalistic credentials or affiliation, Ms. Neidigh submitted a formal “Media Request to Permit Coverage,” which was denied by the Hon. Judge Carolyn Gold on July 11, 2025.

MEDIA AGENCY (name)		Court of Random Opinion		FOR CLERK USE ONLY MC-510	
CHANNEL/FREQUENCY NO.		PERSON SUBMITTING REQUEST (name)		FILED JUL 11 2025 CLERK OF THE COURT BY: [Signature] Clerk of Court	
ADDRESS 13 Fox Valley Drive, Orange Park, FL 32073		Lauren Neidigh			
CITY/STATE/ZIP 32067-1012		TITLE OF CASE		NAME OF JUDGE	
The Superior Court of California - San Francisco County		Laura Deane vs. Michael Marasovic		TBD Hearing set for 8/12/2025 at 9:00 AM in department 425A	
ORDER ON MEDIA REQUEST TO PERMIT COVERAGE					
AGENCY MAKING REQUEST (name)					
1. <input type="checkbox"/> No hearing was held					
2. The court considered all the relevant factors listed in subdivision (a)(3) of California Rules of Court, rule 1.150 (see reverse)					
3. <input type="checkbox"/> THE COURT FINDS findings or a statement of decision are optional: <input type="checkbox"/> Attached <input type="checkbox"/> As follows					
THE COURT ORDERS					
4. The request to photograph, record, or broadcast is					
a. <input checked="" type="checkbox"/> denied.					
b. <input type="checkbox"/> granted subject to the conditions in rule 1.150, California Rules of Court, AND the following:					
(1) <input type="checkbox"/> The total fees of this court regarding media activity outside the courtroom (copy attached)					
(2) The cost of the presiding or supervising judge requiring media activity outside the courtroom (copy attached) <input type="checkbox"/> to be determined					
(3) Payment to the clerk of increased court-related costs of (specify) \$					
(4) The media agency shall demonstrate to the court that the proposed personnel and equipment comply with California Rules of Court, rule 1.150, and any local rule or order					
(5) Personnel and equipment shall be placed: <input type="checkbox"/> as directed <input type="checkbox"/> as indicated in the attachment <input type="checkbox"/> as follows (specify):					
(6) <input type="checkbox"/> The attached statement of agreed pooling arrangements is approved.					
(a) <input type="checkbox"/> A statement of agreed pooling arrangements satisfactory to the court shall be filed before coverage begins.					
(7) <input type="checkbox"/> This order					
(a) <input type="checkbox"/> shall not apply to allow coverage of proceedings that are continued					
(b) <input type="checkbox"/> shall apply to allow coverage of proceedings that are continued					
(c) <input type="checkbox"/> Other (specify):					
5. Coverage granted in item 4b is restricted in the following proceedings:					
a. <input type="checkbox"/> All proceedings, except those prohibited by California Rules of Court, rule 1.150, and those proceedings prohibited by further court order.					
b. <input type="checkbox"/> Only the following proceedings (specify type or date or both):					
6. <input type="checkbox"/> The order made on (date) is <input type="checkbox"/> terminated <input type="checkbox"/> modified as follows (specify):					
7. <input type="checkbox"/> Number of pages attached					
Date: JUL 11 2025					
(See reverse for additional information)					
ORDER ON MEDIA REQUEST TO PERMIT COVERAGE					
Page 1 of 1					

1 Within 24 hours of that denial, Ms. Neidigh retaliated by releasing a monetized
2 YouTube video titled “Con Artist Laura Owens Crashes Out & Wants Her Victim
3 Prosecuted,” in which she falsely claimed that the original restraining order was “based
4 on completely fabricated information” and referred to Respondent—who has been subject
5 to a valid DVRO since 2018—as “one of [Petitioner’s] victims.” On July 16, 2025, she
6 escalated her campaign with another video entitled “Help Mike Marraccini Fight His
7 Abuser in Court,” in which she again labeled Petitioner as the abuser and openly
8 encouraged her audience to donate to Respondent’s GoFundMe legal defense fund.
9



Although Ms. Neidigh is not the most widely followed or monetized figure
profiting from this case, she is part of a much broader online ecosystem of content
creators who have built a cottage industry around harassing, misrepresenting, and
dehumanizing Petitioner for profit. Collectively, these individuals have released
thousands of monetized videos since 2023—mocking Petitioner’s medical conditions,

1 sharing private details of her legal proceedings, and promoting false narratives designed
2 to incite hatred. Ms. Neidigh alone has posted over 150 such videos since May 2024.

3
4 Requiring Petitioner to testify in person would only amplify the potential for
5 further exploitation, screen captures, and viral mockery—serving no probative legal
6 function but inflicting profound emotional and medical harm. Petitioner’s physical health
7 is fragile, her psychiatric condition acute, and the courtroom environment—particularly
8 one populated by observers affiliated with an online harassment campaign—poses an
9 undeniable threat to her safety and well-being. By contrast, written testimony would
10 provide the Court with the same factual record, without endangering Petitioner or
11 enabling further abuse.

12 Petitioner anticipates that Respondent may attempt to discredit her medical records
13 by questioning their authenticity. However, any such claim would be entirely speculative
14 and unsupported by evidence. Petitioner is fully prepared to authorize HIPAA-compliant
15 releases and welcomes any lawful effort by Respondent to verify the documentation
16 directly with her licensed medical providers. Absent such action, vague insinuations
17 should carry no weight with the Court.

18 19 **IX. REQUEST TO SEAL**

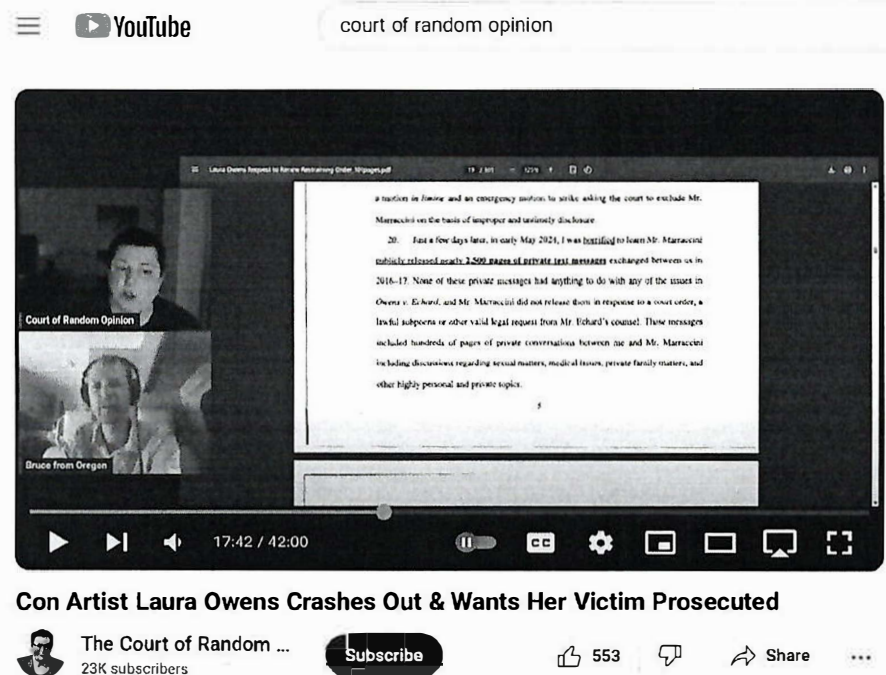
20 Petitioner respectfully moves to file this motion under seal in accordance with
21 California Rules of Court 2.550 and 2.551. Sealing is necessary to protect highly
22 sensitive medical information and to prevent foreseeable and substantial harm stemming
23 from the public dissemination of these materials.

24
25 As outlined above, Petitioner has been subjected to a pattern of coordinated online
26 harassment and targeted exploitation of her court filings. The risk of further public
27 exposure—especially involving the deeply personal medical diagnoses and treatment
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1 details contained herein—is not hypothetical. Prior pleadings have been obtained and
2 weaponized in online forums, triggering renewed waves of harassment, body-shaming,
3 and emotional abuse.

4 Under Rule 2.550(d), the Court may seal records where:

- 5
- 6 • A compelling interest supports sealing;
 - 7 • That interest would be prejudiced by disclosure;
 - 8 • The proposed sealing is narrowly tailored; and
 - 9 • No less restrictive means are available to protect the interest.
- 10



23 Petitioner submits that compelling interests—including medical privacy, personal
24 safety, and protection from retaliatory online abuse—warrant sealing this motion
25 pursuant to California Rules of Court 2.550 and 2.551. As this Court is already aware,
26 Petitioner's July 9, 2025 DVRO renewal filing was obtained and disseminated on social
27 media within 24 hours of submission, resulting in a surge of harassment and public

1 ridicule. Petitioner therefore respectfully requests that the Court order the motion filed
2 under seal in its entirety.
3
4

5 **VIII. CONCLUSION**

6 The relief Petitioner is seeking in this matter does not turn on her credibility. It
7 does not require the Court to assess competing narratives or weigh disputed facts.
8 Respondent has already publicly admitted—on video—that he knowingly traveled across
9 state lines to appear at a court hearing in violation of an active Domestic Violence
10 Restraining Order issued by this Court. He acknowledged under no uncertain terms that
11 he had no intent to testify, and therefore appeared solely for the purpose of intimidating
12 Petitioner—a calculated act that violated both the letter and spirit of the DVRO.

13 When the restrained party openly admits to conduct that breaches a protective
14 order, the protected party's credibility is no longer material. The violation stands on
15 Respondent's own words and actions. In such a case, requiring live testimony from
16 Petitioner—who suffers from documented neurological and psychological conditions
17 arising in part from Respondent's abuse—would serve no evidentiary purpose. It would
18 only expose her to retraumatization and contradict the protective intent of the Domestic
19 Violence Prevention Act and the Americans with Disabilities Act.

20 The law does not compel survivors to suffer further in order to assert their rights.
21 California Family Code § 217(c) and California Rule of Court 5.113 provide this Court
22 with the authority to accept written declarations when good cause exists—and here, that
23 standard is not only met but surpassed. Respondent's admitted violation, combined with
24 Petitioner's medical vulnerability and the credible threat of continued harassment,
25 constitute compelling grounds for relief.
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For these reasons, Petitioner respectfully requests that this Court grant her motion to proceed by written declaration and waive the requirement for live testimony at the evidentiary hearing.

Respectfully submitted this 21st day of July, 2025.

Lawrence

Laura Owens