

1 **THE EAGLE LAW FIRM**
2 **Omar Serrato, SBN #295975**

3 **T:** [REDACTED]
4 [REDACTED]

5 Attorney for Respondent, MICHAEL MARRACCINI

ELECTRONICALLY
FILED
*Superior Court of California,
County of San Francisco*

05/04/2026
Clerk of the Court
BY: JONATHAN J. WONG
Deputy Clerk

6 **THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**
7 **COUNTY OF SAN FRANCISCO (Civic Center Courthouse)**

8	LAURA OWENS)	Case No: FDV-18-813693
9)	
10	Petitioner)	
11)	
12	vs.)	
13)	DECLARATION OF OMAR SERRATO IN
14	MICHAEL MARRACCINI)	SUPPORT OF RESPONDENT'S MOTION FOR
15)	ATTORNEY FEES AND COSTS
16	Respondent)	
17)	Hearing Date: July 20, 2026
18)	
19)	Time: 9:00 a.m.
20)	Dept: 405A Judge: Hon. Carolyn Gold
21)	
22)	

23 **DECLARATION OF OMAR SERRATO**

24 I, OMAR SERRATO, declare as follows:

25 1. I am an attorney admitted to practice before all courts of the State of California (State Bar
26 No. 295975, admitted 2014). I am the Managing Attorney of The Eagle Law Firm ("the Firm"),
27 counsel of record for Respondent Michael Marraccini in the above-captioned action. I make this
28 declaration in support of Respondent's Motion for Attorney Fees and Costs. I have personal
knowledge of the matters stated herein and, if called as a witness, could and would competently so
testify.

2. Background and Qualifications. I have been licensed to practice law in the state of
California since 2014. My practice concentrates on contested California family law (including DVPA

1 proceedings, dissolutions, custody, and support), civil litigation, and wills, trusts, and estates. I have
2 appeared as lead counsel in numerous contested evidentiary hearings and bench trials primarily in
3 Southern California, including in San Bernardino, Riverside, Los Angeles, and Orange Counties. This
4 matter is my first appearance in San Francisco. The Firm maintains an active DVPA practice.

5
6 3. Engagement. The Firm was engaged by Respondent on or about July 9, 2025, following
7 Petitioner's filing of a Request to Renew Restraining Order, pursuant to a written engagement
8 agreement signed by Respondent. A true and correct copy of the executed engagement agreement is
9 held in the firm's file and is available to the Court for in camera review upon demand. Respondent
10 does not include the engagement agreement in the public filing in order to preserve the attorney-
11 client privileged terms of representation from public disclosure.

12
13 4. Rates. My standard billing rate is \$500.00 per hour for family law and civil litigation. That
14 rate is consistent with, and at the low end of, prevailing Bay Area market rates for counsel of
15 comparable experience handling contested family law evidentiary matters. (See *PLCM Group, Inc. v.*
16 *Drexler* (2000) 22 Cal.4th 1084, 1095 [lodestar rate is the prevailing market rate for comparable
17 services].) Paralegal Jocelyn Esqueda is billed at \$150.00 per hour. Her work consisted of exhibit
18 preparation and indexing, e-filing, scheduling, subpoena coordination, and document organization.
19 Her rate is at or below the prevailing regional rate for paralegals of comparable experience.

20
21 5. Scope of Work. Between July 9, 2025 and the dismissal on November 5, 2025, the Firm
22 prepared and filed: (a) Respondent's Response to Request to Renew Restraining Order with fifteen
23 exhibits; (b) a Motion to Disqualify Petitioner's Counsel; (c) a Motion to Dismiss under Code of Civil
24 Procedure section 473; (d) Motions in Limine; (e) a Trial Brief; (f) an Opposition to a Motion to
25 Intervene, Strike, and for Sanctions filed by David Gingras; (g) an Ex Parte Application for Order
26 Shortening Time with supporting declarations; (h) witness and exhibit lists; (i) cross-examination
27 outlines; and (j) supporting correspondence and filings. The Firm appeared at every noticed
28 hearing, remotely or in person as required, and was fully prepared for trial on both October 22,

1 2025 and November 5, 2025.

2
3 6. Procedural History. True and correct copies of the Mini Minutes from the October 10,
4 October 21, October 22, and November 5, 2025 hearings before the Honorable Carolyn Gold are
5 attached as Exhibit 2.

6
7 7. Equestrian Competition Records. True and correct copies of the 2025 Scottsdale Fall
8 Classic 2 show approval pages, show information, results-page screenshots, and competition
9 photographs reflecting Petitioner's participation are attached as Exhibit 5.

10
11 8. Forensic Report. The Berryhill Forensics Report referenced at Exhibit 3 was previously
12 filed in full as Exhibit A to Respondent's Response to Request to Renew Restraining Order on
13 August 25, 2025.

14
15 9. Maricopa County Indictment. A true and correct copy of the May 1, 2025 Maricopa
16 County Grand Jury Indictment of Petitioner (Case No. CR2025-006831-001 DT) is attached as
17 Exhibit 4.

18
19 10. Time Records. The Firm's contemporaneous time records, organized by date,
20 timekeeper, hours, rate, and task narrative, are attached as Exhibit 1 to the Exhibit Package. All
21 hours are stated to one decimal place. Serrato merits hours total 180.2. Serrato fees-on-fees hours
22 total 11.7. Paralegal hours total 65.5.

23
24 11. Redactions to Exhibit 1. Exhibit 1 to the Exhibit Package has been filed in redacted form.
25 The redactions are limited to the narrative description column of selected time entries and are
26 confined to three categories of information: (a) the identity of a fact witness who provided
27 information to The Eagle Law Firm in connection with this matter; (b) attorney work product
28 reflecting cross-examination strategy, impeachment sequencing, and the analytical use of the

1 forensic text-communication record described in the body of the Motion; and (c) the substance of
2 attorney-client communications between Respondent and counsel during trial preparation. The
3 redactions do not affect any information necessary to the Court's lodestar analysis.

4
5 For every redacted entry, the date, timekeeper identifier, hours billed, hourly rate, dollar
6 amount, and general task category remain fully visible.

7
8 A complete unredacted version of Exhibit 1 has been retained by The Eagle Law Firm and is
9 available to the Court for in camera inspection upon request. (Exhibit 1-A, lodged separately with
10 this Firm; available upon Court order.)

11
12 Counsel respectfully submits that the redactions reflect the protection of attorney work
13 product under Code of Civil Procedure section 2018.030, the protection of attorney-client
14 communications under Evidence Code section 954, and the protection of a non-party witness from
15 public identification in a matter where the underlying conduct giving rise to the dismissal included
16 a documented pattern of harassment of third-party witnesses.

17
18 12. Voluntary Reductions. Fees sought in this Motion reflect substantial voluntary
19 downward adjustments before submission. A substantial amount of additional work was performed
20 but was not billed, including the independently-incurred attorney fees of co-counsel Rachael E.
21 Juarez of Bersch & Juarez LLP, which are not reflected in this Firm's billing and are not being
22 requested as part of this Motion. Counsel-incurred travel and lodging expenses for the in-person
23 trial appearances are not reflected in the costs sought and are not being requested, notwithstanding
24 their potential recovery under Family Code section 6344(b).

25
26 13. Trial-Preparation and Forensic-Review Hours. The Firm allocated approximately
27 sixteen attorney hours between October 15 and October 18, 2025 to cross-examination outline
28 preparation, and approximately thirty-one combined attorney and paralegal hours between July

1 and October 2025 to forensic-record analysis.

2
3 14. Lodestar Calculation. The requested fees are calculated as follows:

4

5 Serrato (merits): 180.2 hrs x \$500.00	\$90,100.00
6 Serrato (fees-on-fees): 11.7 hrs x \$500.00	\$5,850.00
7 Paralegal: 65.5 hrs x \$150.00	\$9,825.00
8 Subtotal fees	\$105,775.00
9 Documented costs (firm, court, third-party)	\$3,858.98
10 TOTAL	\$109,633.98

11 15. Costs. Itemized costs of \$3,858.98 consist of: (a) Firm-advanced costs (OneLegal filing
12 fees, postage, certified copies, medical records) of \$637.70; (b) court filing fees of \$140.00; and (c)
13 known third-party vendor invoices of \$3,081.28, comprising Behmke Reporting and Video Services
14 (Invoice 78515AC) at \$837.94 for the October 22, 2025, court reporter cancellation fee, Combs
15 Reporting, Inc. (Invoice 28284) at \$2,000.00 for the November 5, 2025, full-day in-person court
16 reporter services by Heather Bautista, and Wheels of Justice (Invoice 13007820) at \$243.34 for
17 court filing of the Ex Parte RFO Package on October 1, 2025. True and correct copies of these
18 invoices are attached as Exhibits 7, 8, and 9.

19 16. Disclosure of Third-Party Funding (GoFundMe). In the interest of candor to this Court, I
20 disclose the following. Following the filing of Petitioner's Request to Renew Restraining Order,
21 Respondent launched a public GoFundMe campaign to help cover the cost of defending against the
22 renewal petition. The campaign raised approximately \$49,000.00 in gross pledges. After the
23 platform's processing and transfer fees, Respondent received net proceeds of approximately
24 \$47,000.00, of which approximately \$40,000.00 has been applied to legal fees billed by the Firm.
25 Petitioner has since filed an appeal of the November 5, 2025 dismissal (Case No. A175236), and
26 Respondent continues to incur legal costs in defense of the judgment obtained below. Respondent
27 remains contractually obligated to the Firm for the full balance of fees and costs under the
28 engagement agreement.

17. Post-Dismissal Application (Ex. 24). Exhibit 24 is a true and correct copy of Petitioner's

1 April 23, 2026 Ex Parte Application for Extension of Time to File Opening Brief, filed by Petitioner
2 in pro per in the Court of Appeal of the State of California, First Appellate District, in Owens v.
3 Marraccini, Case No. A175236, and granted by that Court the same day. The application contains, at
4 Section VIII, Petitioner's written notice of intent to seek a new domestic violence protective order
5 against Respondent.
6

7 18. No Notice of Entry; Hearing Date Reservation. Exhibit 22 contains the email thread
8 between this Firm and Department 405A confirming that no Notice of Entry was served after the
9 November 5, 2025 dismissal and reserving July 20, 2026 at 9:00 a.m. in Department 405A as the
10 hearing date for this Motion.
11

12 19. Exhibits. A complete inventory of the Exhibit Package is set out in the concurrently filed
13 Index of Exhibits. I have personal knowledge of, and I authenticate, each exhibit therein as a true
14 and correct copy of the document it purports to be.
15

16 20. The fees and costs stated above were actually incurred, were reasonable and necessary
17 to the defense of this matter, and reflect work that was properly performed at the rates stated.
18

19 I declare under penalty of perjury under the laws of the State of California that the foregoing
20 is true and correct. Executed this 29th day of April, 2026, at San Bernardino, California.

21 Dated: April 29, 2026

THE EAGLE LAW FIRM

Omar R. Serrato

23 _____
24 Omar Serrato
25 Attorney for Respondent,
26 MICHAEL MARRACCINI
27
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