

Desirée Townsend
2901 Ocean Park Blvd., Suite 201
Santa Monica, CA 90405
desiree@sparktrademarks.com
PLAINTIFF *IN PRO SE*

Plaintiff,
DESIREE GUERRIERE TOWNSEND

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES - UNLIMITED**

DESIRÉE GUERRIÈRE TOWNSEND, an
individual,

Plaintiff,

v.

MARIO LOPEZ, an individual; and DOES 1
through 50, inclusive,

Defendant.

Case No.: 25NNCV04089

ASSIGNED FOR ALL PURPOSES TO THE HON.
ASHFAQ G. CHOWDHURY, DEPT. E

**PLAINTIFF DESIREE TOWNSEND'S
REQUEST FOR JUDICIAL NOTICE IN
SUPPORT OF OPPOSITION TO
DEFENDANT'S SPECIAL MOTION TO
STRIKE FIRST AMENDED COMPLAINT**

*[Filed concurrently with Opposition to Special
Motion to Strike First Amended Complaint;
Declaration of Desiree Townsend; Notice of
Lodging; and Evidentiary Objections to the
Declaration of Daniel Tapetillo]*

Date: September 19, 2025

Time: 8:30 AM

Place: Dept. E

Reservation ID: 760241912018

REQUEST FOR JUDICIAL NOTICE

Pursuant to Code of Civil Procedure section 425.16, subdivision (b)(2), Evidence Code sections 452 and 453, and California Rules of Court, rule 3.1306(c), Plaintiff Desiree Guerriere Townsend respectfully requests that the Court take judicial notice of the following documents in support of her Opposition to Defendant Mario Lopez’s Special Motion to Strike under CCP § 425.16:

- A. Petition filed by Defendant Mario Lopez in the related matter, *Lopez v. Townsend*, Case No. 25STRO03858 (L.A. Super. Ct. June 20, 2025).
- B. Certified transcripts from the August 5, 2025 hearing in *Lopez v. Townsend*, containing the sworn testimony of Defendant Mario Lopez and his wife, Courtney Lopez.

Pursuant to Evidence Code section 453, “the trial court shall take judicial notice of any matter specified in Section 452 if a party requests it and: (a) gives each adverse party sufficient notice of the request, and (b) furnishes the court with sufficient information to enable it to take judicial notice of the matter.” (Evid. Code, § 453). Section 452, in turn, authorizes the Court to take judicial notice of records of “any court of this state.” (Evid. Code, § 452, subd. (d)). Exhibits A and B are court records from a related matter involving the same parties and overlapping subject matter, and are therefore subject to judicial notice under section 452(d).

Further, Evidence Code section 452(h) permits judicial notice of “[f]acts and propositions that are not reasonably subject to dispute and are capable of immediate and accurate determination by resort to sources of reasonably indisputable accuracy.” Exhibits A and B, as official court filings and certified transcripts, plainly fall within this category.

Indeed, the court not only may, but “must” “disregard allegations that are contrary to judicially noticed facts and documents.” (*Schep v. Capital One, N.A.* (2017) 12 Cal.App.5th 1331, 1337 [taking judicial notice of a deed of trust in holding demurrer was properly sustained]; see also *Campbell v. Lauigan* (1988) 202 Cal.App.3d 651, 655-656 “[C]ourts ... will not close their eyes to situations where a complaint contains ... allegations contrary to facts which are judicially noticed.”).) It is therefore appropriate—and indeed necessary—for the Court to take judicial notice of Exhibits A and B.

1 For these reasons, Plaintiff respectfully requests that the Court take judicial notice of Exhibits A
2 and B in ruling on Defendant's Special Motion to Strike the First Amended Complaint.

3
4 Dated: September 8, 2025

5 By: 
6 DESIREE GUERRIERE TOWNSEND
7 PLAINTIFF *IN PRO SE*
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EXHIBIT A

Request for Civil Harassment
Restraining Orders

Read Can a Civil Harassment Restraining Order Help Me? (form CH-100-INFO) before completing this form. Also fill out Confidential CLETS Information (form CLETS-001) with as much information as you know.

① Person Seeking Protection

a. Your Full Name:

Mario LopezAge: 51

Your Lawyer (if you have one for this case)

Name: Alexandra KazarianState Bar No.: 244494Firm Name: GERAGOS & GERAGOS

b. Your Address (If you have a lawyer, give your lawyer's information. If you do not have a lawyer and want to keep your home address private, you may give a different mailing address instead. You do not have to give telephone, fax, or e-mail.)

Address: 644 S. Figueroa St.City: Los Angeles State: CA Zip: 90017Telephone: 213-625-3900 Fax: (Petitioner did not provide)E-Mail Address: GERAGOS@GERAGOS.COM

Clerk stamps date here when form is filed.

FILED
Superior Court of California
County of Los Angeles

JUN 20 2025

David W. Slayton, Executive Officer/Clerk of Court
By: M. Kocharyan, Deputy

Fill in court name and street address:

Superior Court of California, County of

Los Angeles Superior Court
Northwest District - East Courthouse
6230 Sylmar Avenue
Van Nuys, CA 91401

Court fills in case number when form is filed.

Case Number:

25STR003858

② Person From Whom Protection Is Sought

Full Name: Desiree TownsendAge: 45Address (if known): 2901 Ocean Park Blvd. Suite 201City: Santa Monica State: CA Zip: 90405

③ Additional Protected Persons

a. Are you asking for protection for any other family or household members? ☒ Yes ☐ No If yes, list them:

Full Name	Sex	Age	Lives with you?	How are they related to you?
<u>Courtney Lopez</u>	<u>Female</u>	<u>42</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<u>Spouse</u>
<u>Gia Lopez</u>	<u>Female</u>	<u>14</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<u>Child</u>
<u>Dominic Lopez</u>	<u>Male</u>	<u>11</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<u>Child</u>
<u>Santino Lopez</u>	<u>Male</u>	<u>5</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<u>Child</u>

☒ Check here if there are more persons. Attach a sheet of paper and write "Attachment 3a—Additional Protected Persons" for a title. You may use form MC-025, Attachment.

b. Why do these people need protection? (Explain below):

☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 3b—Why Others Need Protection" for a title.

because Ms. Townsend has repeatedly involved and exposed Mr. Lopez's family, including his minor children, in her campaign of harassment—culminating in her accompanying a process server to their home and posting footage of their residence online. Her conduct has caused fear, distress, and an ongoing threat to their safety and privacy.

This is not a Court Order.



4 Relationship of Parties

How do you know the person in (2)? (Explain below):

☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 4—Relationship of Parties" for a title.

Mr. Lopez has never met nor had any contact with Desiree Townsend. In addition to

5 Venue online harassment. He's a public figure and she is obsessed with him.

Why are you filing in this county? (Check all that apply):

- a. ☒ The person in (2) lives in this county.
b. ☒ I was harassed by the person in (2) in this county.
c. ☐ Other (specify): _____

6 Other Court Cases

a. Have you or any of the persons named in (3) been involved in another court case with the person in (2)?

☒ Yes ☐ No (If yes, check each kind of case and indicate where and when each was filed.)

Kind of Case	Filed in (County/State)	Year Filed	Case Number (if known)
(1) <input type="checkbox"/> Civil Harassment	_____	_____	_____
(2) <input type="checkbox"/> Domestic Violence	_____	_____	_____
(3) <input type="checkbox"/> Divorce, Nullity, Legal Separation	_____	_____	_____
(4) <input type="checkbox"/> Paternity, Parentage, Child Custody	_____	_____	_____
(5) <input type="checkbox"/> Elder or Dependent Adult Abuse	_____	_____	_____
(6) <input type="checkbox"/> Eviction	_____	_____	_____
(7) <input type="checkbox"/> Guardianship	_____	_____	_____
(8) <input type="checkbox"/> Workplace Violence	_____	_____	_____
(9) <input type="checkbox"/> Small Claims	_____	_____	_____
(10) <input type="checkbox"/> Criminal	_____	_____	_____
(11) <input checked="" type="checkbox"/> Other (specify): <u>Civil</u>	<u>Los Angeles, CA</u>	<u>2025</u>	<u>25NNCV04089</u>

b. Are there now any protective or restraining orders in effect relating to you or any of the persons in (3) and the person in (2)? ☒ No ☐ Yes (If yes, attach a copy if you have one.)

7 Description of Harassment

Harassment means violence or threats of violence against you, or a course of conduct that seriously alarmed, annoyed, or harassed you and caused you substantial emotional distress. A course of conduct is more than one act.

a. Tell the court about the last time the person in (2) harassed you.

- (1) When did it happen? (provide date or estimated date): 6/15/2025 and continuing daily
(2) Who else was there?
Mr. Lopez's three children.

This is not a Court Order.



7 a. (3) How did the person in ② harass you? (Explain below):

☒ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7a(3)—Describe Harassment" for a title.

(4) Did the person in ② use or threaten to use a gun or any other weapon?

☐ Yes ☒ No (If yes, explain below):

☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7a(4)—Use of Weapons" for a title.

(5) Were you harmed or injured because of the harassment?

☒ Yes ☐ No (If yes, explain below):

☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7a(5)—Harm or Injury" for a title.

Mr. Lopez was harmed by the most recent harassment when Ms. Townsend arrived at his home on Father's Day with a process server, causing chaos and fear for his young children and family members who witnessed the event. She then escalated the harm by posting a video of the service on TikTok, exposing his family and home address to millions of viewers, placing them at risk of further harassment, public ridicule, and potential physical danger.

(6) Did the police come? ☐ Yes ☒ No

If yes, did they give you or the person in ② an Emergency Protective Order? ☐ Yes ☐ No

If yes, the order protects (check all that apply):

☐ Me ☐ The person in ② ☐ The persons in ③.

(Attach a copy of the order if you have one.)

b. Has the person in ② harassed you at other times?

☒ Yes ☐ No (If yes, describe prior incidents and provide dates of harassment below):

☒ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7b—Previous Harassment" for a title.

This is not a Court Order.



Check the orders you want. ☒

8 ☒ Personal Conduct Orders

I ask the court to order the person in (2) not to do any of the following things to me or to any person to be protected listed in (3):

- a. ☒ Harass, intimidate, molest, attack, strike, stalk, threaten, assault (sexually or otherwise), hit, abuse, destroy personal property of, or disturb the peace of the person.
- b. ☒ Contact the person, either directly or indirectly, in any way, including, but not limited to, in person, by telephone, in writing, by public or private mail, by interoffice mail, by e-mail, by text message, by fax, or by other electronic means.
- c. ☒ Other (specify):

☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 8c—Other Personal Conduct Orders," for a title.

orders enjoining Respondent from posting, reposting, commenting on, or otherwise publishing any statements about me or my family—directly or indirectly—on any public platform, including but not limited to TikTok, Reddit, Instagram, Twitter (now known as X), LinkedIn, and any blog, podcast, or website under her control or influence.

The person in (2) will be ordered not to take any action to get the addresses or locations of any protected person unless the court finds good cause not to make the order.

9 ☒ Stay-Away Orders

a. I ask the court to order the person in (2) to stay at least 100 yards away from (check all that apply):

- (1) ☒ Me. (8) ☒ My vehicle.
- (2) ☒ The other persons listed in (3). (9) ☐ Other (specify):
- (3) ☒ My home.
- (4) ☒ My job or workplace.
- (5) ☒ My school.
- (6) ☒ My children's school.
- (7) ☒ My children's place of child care.

b. If the court orders the person in (2) to stay away from all the places listed above, will he or she still be able to get to his or her home, school, or job? ☒ Yes ☐ No (If no, explain below):

☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 9b—Stay-Away Orders," for a title.

10 ☒ Firearms (Guns), Firearm Parts, and Ammunition

Does the person in (2) own or possess any firearms (guns), firearm parts, or ammunition? This includes firearm receivers and frames, and any item that may be used as or easily turned into a receiver or frame (see Penal Code section 16531). ☐ Yes ☐ No ☒ I don't know

If the judge grants a protective order, the person in (2) will be prohibited from owning, possessing, purchasing, receiving, or attempting to purchase or receive firearms (guns), firearm parts, and ammunition while the protective order is in effect. The person in (2) will also be ordered to turn in to law enforcement, or sell to or store with a licensed gun dealer, any firearms (guns) and firearm parts within their immediate possession or control. If an order is granted, the person in (2) will also be prohibited from owning, possessing, or buying body armor and would have to relinquish any they have.

This is not a Court Order.

11 ☒ **Temporary Restraining Order**

I request that a Temporary Restraining Order (TRO) be issued against the person in (2) to last until the hearing. I am presenting form CH-110, *Temporary Restraining Order*, for the court's signature together with this *Request*.

Has the person in (2) been told that you were going to go to court to seek a TRO against him/her?

☐ Yes ☒ No (If you answered no, explain why below):

☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 11—Temporary Restraining Order" for a title.

Notice should not be required because Ms. Townsend has already demonstrated a willingness to escalate her harassment in response to perceived legal action, including confronting Mr. Lopez at his private residence and broadcasting the event online. Providing advance notice of the TRO request risks triggering further retaliation, endangering Mr. Lopez, his family, and their privacy, and undermining the very protection.

12 ☒ **Request to Give Less Than Five Days' Notice of Hearing**

You must have your papers personally served on the person in (2) at least five days before the hearing, unless the court orders a shorter time for service. (Form CH-200-INFO explains What Is "Proof of Personal Service"? Form CH-200, Proof of Personal Service, may be used to show the court that the papers have been served.)

If you want there to be fewer than five days between service and the hearing, explain why below:

☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 12—Request to Give Less Than Five Days' Notice" for a title.
I need more time to locate Desiree Townsend.

13 ☒ **No Fee for Filing or Service**

- a. ☒ There should be no filing fee because the person in (2) has used or threatened to use violence against me, has stalked me, or has acted or spoken in some other way that makes me reasonably fear violence.
- b. ☒ The sheriff or marshal should serve (notify) the person in (2) about the orders for free because my request for orders is based on unlawful violence, a credible threat of violence, or stalking.
- c. ☐ There should be no filing fee and the sheriff or marshal should serve the person in (2) for free because I am entitled to a fee waiver. (You must complete and file form FW-001, Application for Waiver of Court Fees and Costs.)

14 ☒ **Lawyer's Fees and Costs**

I ask the court to order payment of my ☒ lawyer's fees ☒ Court costs.

The amounts requested are:

Item	Amount	Item	Amount
Attorney's Fees	\$ TBD		\$
	\$		\$
	\$		\$

☐ Check here if there are more items. Put the items and amounts on the attached sheet of paper or form MC-025 and write "Attachment 14—Lawyer's Fees and Costs" for a title.

This is not a Court Order.



15 ☒ **Possession and Protection of Animals**

I ask the court to order the following:

- ☒ That I be given the sole possession, care, and control of the animals listed below, which I own, possess, lease, keep, or hold, or which reside in my household.

(Identify animals by, e.g., type, breed, name, color, sex.)

French Bulldog, Oscar De La Hoya Lopez (brindle)French Bulldog, Sanchez Lopez (Merle)French Bulldog, Betts Lopez (white with brown spot)

I request sole possession of the animals because (specify good cause for granting order):

- ☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 15a—Possession of Animals" for a title.

Ms. Townsend has demonstrated a pattern of erratic and retaliatory behavior, including targeting Mr. Lopez's family and home, creating a credible concern that she may escalate her harassment to include harm or distress to the family's pets as a means of intimidation or emotional manipulation. Protecting the animals is necessary to ensure the full safety and emotional well-being of the household.

- ☒ That the person in (2) must stay at least 100 yards away from, and not take, sell, transfer, encumber, conceal, molest, attack, strike, threaten, harm, or otherwise dispose of, the animals listed above.

16 ☐ **Additional Orders Requested**

I ask the court to make the following additional orders (specify):

- ☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 16—Additional Orders Requested," for a title.

17 Number of pages attached to this form, if any: 44Date: JUNE 19, 2025Alexandra Kazarian

Lawyer's name (if any)


Lawyer's signature

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

Date: 06/19/2025Mario Lopez

Type or print your name


Sign your name

This is not a Court Order.

Mario Lopez vs. Desiree Townsend

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(This Attachment may be used with any Judicial Council form.)

<u>Full Name</u>	<u>Sex</u>	<u>Age</u>	<u>Lives with you?</u>	<u>How are they related to you?</u>
<u>Elaine Mazza</u>	<u>Female</u>	<u>76</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<u>Parent</u>
<u>Frances Pons</u>	<u>Female</u>	<u>71</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<u>Aunt</u>
<u> </u>	<u> </u>	<u> </u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<u> </u>

(Add pages as required)

www.courtinfo.ca.gov

Attachment 7a(3)—Describe Harassment

I. INTRODUCTION

Petitioner Mario Lopez seeks a Civil Harassment Restraining Order pursuant to California Code of Civil Procedure section 527.6. Respondent Desiree Townsend has engaged in a knowing and willful course of conduct that includes defamatory online attacks, cyber harassment, reputational damage, and public exposure of Petitioner's private information. These actions have caused Petitioner to fear for his safety and that of his family. Because Respondent's conduct is not constitutionally protected speech and serves no legitimate purpose, injunctive relief is appropriate and legally supported.

II. LEGAL STANDARD

California Code of Civil Procedure § 527.6 permits a person who has suffered harassment to seek injunctive relief. Harassment is defined as:

- Unlawful violence
- A credible threat of violence; or
- A knowing and willful course of conduct directed at a specific person that seriously alarms, annoys, or harasses the person and serves no legitimate purpose.

(C.C.P. § 527.6(b)(3).)

"Course of conduct" includes harassing correspondence by any means, including internet and social media communications. (C.C.P. § 527.6(b)(1).)

III. ONLINE DEFAMATION AND CYBER HARASSMENT QUALIFY AS HARASSMENT UNDER § 527.6

California courts have expressly recognized that speech constituting harassment under § 527.6 is not protected by the First Amendment. In *E.G. v. M.L.*, the court upheld a civil harassment restraining order where the respondent engaged in online defamation that was adjudicated to be false and aimed at discrediting the petitioner through repetition of baseless accusations. 105 Cal. App. 5th

688, 704 (2024). The court held such speech was not constitutionally protected and affirmed that substantial evidence supported a finding of harassment for no legitimate purpose. *Id.*

Likewise, in *Luo v. Volokh*, the court acknowledged the potential for online exposure of private details to cause significant fear, reputational damage, and emotional distress—even where the conduct falls short of a physical threat. 102 Cal. App. 5th 1312, 1323 (2024).

Here, Respondent Townsend has published false, inflammatory, and defamatory statements about Petitioner and his family across social media platforms, in connection with a broader online smear campaign that also included viral video reposts, TikTok commentary, and Reddit threads. These posts have no legitimate purpose and are calculated to inflict reputational and emotional harm.

IV. CIVIL HARASSMENT RESTRAINING ORDERS DO NOT VIOLATE THE FIRST AMENDMENT WHEN THEY ADDRESS UNLAWFUL SPEECH

It is well-established that civil harassment restraining orders do not constitute unconstitutional prior restraints where the speech in question has been judicially determined to be unprotected. In *Huntingdon Life Sciences, Inc. v. Stop Huntingdon Animal Cruelty USA, Inc.*, the court affirmed the issuance of an injunction against speech that rose to the level of harassment. 129 Cal. App. 4th 1228, 158-59 (2005).

In *R.D. v. P.M.*, the court upheld a restraining order that limited harassing conduct without unduly impairing protected speech. 202 Cal.App.4th 181, 190-91 (2011).

Moreover, *Parisi v. Mazzaferro* holds that an injunction prohibiting repetition of speech found to be unlawful does not amount to a prohibited prior restraint. 5 Cal.App.5th 1219, 1228-29 (2016).

Thus, courts have recognized that even online expression may be curtailed when it amounts to harassment. *See also* *In re Marriage of Evilsizor & Sweeney*, 237 Cal.App.4th 1416, 1425-26 (2015), upholding an order prohibiting dissemination of private information following a finding of abuse.

V. THE FACTS HERE WARRANT INJUNCTIVE RELIEF

a. *All Harassing Social Media Posts are authored by Desiree Townsend*

The harassing social media posts attached to this request were authored by Desiree Guerriere Townsend, as confirmed by multiple overlapping identifiers across platforms and her own admissions.

1. Direct Name Usage and Public Identity:

On LinkedIn, all posts about the lawsuits against Paramount and Mario Lopez were published under the verified account of "Desirée Guerrière Townsend" (LinkedIn profile) Townsend social media. These posts explicitly refer to the lawsuits she filed and reference her personal medical history, matching the allegations in the complaint served on Mr. Lopez.

2. Consistent Handle Across Platforms:

The TikTok and Twitter posts targeting Mr. Lopez and referencing the lawsuits were published under the handle @cheerleader4change and @cheering4change, which are consistent with the branding Townsend publicly claims (referencing her prior nickname, the "Flu Shot Cheerleader"). Many of these posts include video and photo content of her and her legal filings, further confirming authorship.

3. Admission of Identity on Reddit:

On Reddit, Townsend commented under the username "FunctionTiny1302" and directly stated, "Yes, it's me... Desiree here (formerly Jennings)," in response to someone identifying her. In the same thread, she confirmed details about her lawsuit against Mr. Lopez and referenced harassment she believes is coming from his PR team—further linking her to both the Reddit and other social media content.

4. Cross-referencing of Content and Lawsuit:

The social media posts cite and preview exact claims, timelines, and screenshots from Townsend's publicly filed complaint against Mr. Lopez (LASC Case No. 25NNCV04089). For example, the June 16, 2025 TikTok post showing Mr. Lopez being served is captioned by @cheerleader4change with references to the legal action and her lawsuit timeline. These are

1 matters only known to Townsend and match the content of the filed complaint,
2 demonstrating she is the source.

3
4 In summary, Desiree Townsend has used her real name and confirmed social media handles
5 across platforms to promote and amplify the same false, inflammatory, and harassing content about
6 Mr. Lopez that she included in her civil lawsuit. There is no question that she is the originator of the
7 materials described and attached to this CHRO.

8 b. *Course of Conduct: Online Harassment and Delusional Allegations Involving Mario Lopez*

9
10 Beginning in early 2025, and escalating rapidly in the months leading up to this filing, Ms.
11 Desiree Guerriere Townsend has engaged in a pattern of obsessive and delusional conduct across
12 social media platforms—including TikTok, Reddit, Twitter, and LinkedIn—directly targeting Mario
13 Lopez and falsely accusing him of participating in a grand conspiracy with Paramount Global, CBS,
14 and other media organizations to defame, discredit, and suppress her. These posts reflect not just
15 harassment, but the kind of detached-from-reality fixation that creates a credible threat.

16
17 On March 23, 2025, Townsend tweeted from her account that she was “getting ahead of a
18 disgusting media push Mario Lopez is planning against me,” and that she would be filing a
19 defamation suit once she collected “defamatory statements” from his alleged PR team on Reddit.
20 She then posted “two can play at this game fuckface @mariolopezviva,” followed by “how’s your
21 new vagina bitch?”—language that is both aggressive and deeply unhinged .


22
23 By March 24, 2025, Townsend escalated to accusing Mr. Lopez of rape, tweeting, “no one
24 seems disturbed that @mariolopezviva was accused in the 90s of raping teenage girls.”

25
26 On April 2, 2025, she published a video titled “How I will prove Mario Lopez defamed me,”
27 in which she continued her baseless campaign of personal attacks on Mr. Lopez and his family .
28

1 On May 31, 2025, she posted a TikTok with the caption, "Lawsuit #3 drops Father's Day.
2 Mario Lopez, consider this your early gift. #LitigationShark." That same day, she mocked Mr.
3 Lopez's religious Instagram post, stating: "God's plan won't save you from the consequences,
4 Mario. God's soldier wears heels, files lawsuits and never misses her marks".

5
6 By June 6, 2025, she posted another TikTok taunting: "Let's see if you guys can cover up my
7 lawsuit next week against actor Mario Lopez too. Summons and conformed Complaint coming
8 soon..." . On June 7, she appeared to post three separate TikToks filmed on the NBCUniversal lot
9 using their WiFi, while publicly claiming she was using company resources to sue "NBC's Mario
10 Lopez." She stated that her \$10 million lawsuit would go to "Women in Media" and declared herself
11 "Hollywood's Destroyer".

12
13 On June 8, she solicited help from the public, offering to pay "\$50/hour" to "serve Mario
14 Lopez" in Los Angeles. This offer was made publicly via TikTok and raised real fears that she was
15 mobilizing third parties to physically approach Mr. Lopez and his family .

16
17 On June 14, she wrote that her "Mario Lawsuit  " would "expose Paramount Next
18 Week," and bizarrely blamed Mr. Lopez for causing problems at a shareholder meeting, calling him
19 "Mario 'Tippy-toes' Lopez" . The next day, she published: "Townsend v. Lopez et al. POV Karma:
20 when Mario Lopez orchestrates a smear campaign against you and instantly gets it returned to
21 sender" .

22 On June 16, she posted video of Mr. Lopez being served on Father's Day, captioned with
23 triumphal and mocking language. She followed this with several TikTok videos claiming he had
24 defamed her and "cost [her] jobs," falsely alleging that his Instagram still contains defamatory
25 content. In these comments, she claims he "used [her] for fame," "chased clout," and "cost [her]
26 income" .

1 Simultaneously, on Reddit, using the account "FunctionTiny1302," Townsend posted dozens
2 of vile and delusional accusations over a period of three months. These included:

- 3 • Claims that Mr. Lopez had to pay women for sex, committed "date rape" in
4 the 1990s, and is friends with sex trafficker Andrew Tate
- 5 • That he had plastic surgery to feminize his appearance, including "vaginal
6 rejuvenation" due to "roast beef" allegedly visible in gym shorts
- 7 • That he orchestrated a coordinated "astroturfing smear campaign" against her
8 via Reddit and that his PR team is behind anonymous Reddit accounts attacking her
9 credibility
- 10 • A statement that watching his film performance in The Journey: Absolution
11 inspired her to "shave and bleach [her] buttohole" to get into Hollywood

12 She has called Mr. Lopez a "serial rapist," "grapist," "clown," and "D-list has-been" across
13 multiple platforms and comment threads. In her LinkedIn posts, she accuses him of being part of a
14 corporate conspiracy to suppress news of her lawsuit and influence insider trading at Paramount and
15 CBS.

16
17 These are not random, single incidents. This is a deliberate, ongoing, and malicious
18 campaign of targeted harassment fueled by conspiracy, rage, and what appears to be a mental health
19 disorder. Mr. Lopez reasonably fears that Ms. Townsend's delusions may escalate into physical
20 danger for himself or his family.

21
22 He has never met or interacted with Ms. Townsend in any personal capacity. Her obsession
23 with him, and with fabricating a narrative that casts him as a perpetrator in some vast media
24 conspiracy, is both defamatory and deeply frightening. The need for a restraining order is urgent and
25 obvious.

26 *c. Delusional and Conspiratorial Allegations in Civil Filing*
27 *Demonstrate a Threatening Pattern of Behavior*
28

1 Ms. Townsend's civil complaint against Mr. Lopez, filed on June 13, 2025 in Los Angeles
2 Superior Court (Case No. 25NNCV04089), is not a typical defamation suit. It is a document filled
3 with inflammatory, baseless, and paranoid conspiracy theories that reveal the extent of her
4 delusional fixation on Mr. Lopez and his family. The content of this complaint, which has been
5 publicly posted and shared across her social media platforms, demonstrates the need for immediate
6 protection.

7
8 Among the disturbing allegations contained in her 37-page complaint:

9 • **She accuses Mr. Lopez of "manipulating Instagram's algorithm" to**
10 **suppress her and punish her for confronting him**, stating that he deliberately used her as
11 "algorithmic fuel" to recover from visibility penalties following a paid advertisement. This
12 demonstrates a profound detachment from reality and a belief that Mr. Lopez controls or
13 weaponizes complex tech infrastructure for the sole purpose of targeting her.

14 • **She alleges a wide-ranging media and public relations conspiracy,**
15 involving not just Mr. Lopez, but also NBCUniversal, Paramount Global, CBS, and unnamed
16 "crisis PR teams," whom she claims collaborated to launch a "coordinated smear campaign"
17 against her across multiple social platforms including TikTok and RedditMario.

18 • **She refers to Mr. Lopez's social media posts as "psychological**
19 **warfare"** and repeatedly compares his actions to those of Harvey Weinstein, asserting that
20 he follows a "reputation management playbook" designed to silence dissent and suppress
21 women.

22 • **She expresses a belief that Mr. Lopez orchestrated anonymous Reddit**
23 **campaigns against her**, based on posts from a user named "Top-Strategy-1261," who she
24 theorizes is either Mr. Lopez or someone hired by him. She identifies this anonymous
25 criticism as part of a broader "tactical defamation network" aimed at destabilizing her mental
26 health and silencing her voice.

1 • **She invokes themes of retaliation and industry-wide corruption, framing**
2 herself as the lone truth-teller in a system designed to protect predators, concluding with a
3 statement that this lawsuit is "just the beginning" of a larger effort to dismantle power
4 structures in Hollywood.

5 This type of language and worldview is not only unhinged—it is threatening. Ms. Townsend
6 has demonstrated:

- 7
- 8 • A repeated willingness to publicly accuse Mr. Lopez of heinous crimes
 - 9 without evidence;
 - 10 • A fixation on imagined surveillance, manipulation, and retaliation;
 - 11 • An obsessive focus on Mr. Lopez's family and home life, including filming
 - 12 and broadcasting video of her lawsuit service at his private residence on Father's Day in front
 - 13 of his young children;
 - 14 • An escalating pattern of grievance and revenge-seeking behavior.
- 15

16 Mr. Lopez and his family are reasonably afraid that Ms. Townsend's detachment from reality
17 and public threats of "exposure" will escalate into physical confrontations or further psychological
18 terror. The content of her own complaint confirms she believes she is in a personal battle against Mr.
19 Lopez, not simply a litigant in a civil case.

20 These documented conspiratorial beliefs, especially her perception that Mr. Lopez is
21 omnipresent in her online life and reputation, show the type of mental state that courts have previously
22 found to justify restraining orders under Code of Civil Procedure § 527.6. Her actions and statements
23 are not constitutionally protected expression; they are targeted harassment and intimidation that serve
24 no legitimate purpose.

25

26 At the time of this filing, Ms. Townsend continues to publish new TikTok videos in which she
27 aggressively and delusionally accuses Mr. Lopez of crimes and misconduct that are entirely baseless.
28 Despite being served with a civil harassment complaint and having full knowledge that her posts are

1 being used as evidence of harassment, she has not relented—instead, she has escalated her campaign.
 2 Her recent posts include renewed false claims that Mr. Lopez is under investigation, that he
 3 orchestrated a “smear operation” funded by Paramount, and that he is using media connections to
 4 silence her. These videos continue to feature dramatic and conspiratorial language, unverified
 5 accusations, and statements that suggest she believes she is in an ongoing war with Mr. Lopez and
 6 powerful media institutions. Her refusal to stop, despite pending legal proceedings, underscores her
 7 instability and makes clear that the harassment is ongoing, deliberate, and dangerous.

8
 9 This conduct mirrors that in *E.G. v. M.L.*, where the respondent’s repetition of harmful, false
 10 content on social media was sufficient for injunctive relief. Petitioner respectfully requests the Court
 11 enjoin Respondent from engaging in further defamatory or harassing speech targeting him or his
 12 family.

13 VI. CONCLUSION

14
 15 Respondent’s conduct constitutes a knowing and willful course of harassment under
 16 California Code of Civil Procedure § 527.6. Because her actions are not constitutionally protected
 17 and have resulted in severe reputational and emotional harm, Petitioner respectfully requests that the
 18 Court issue a Civil Harassment Restraining Order enjoining Respondent from:

- 19 • Posting or disseminating further defamatory or harassing statements about
 20 Petitioner or his family online or offline;
- 21 • Approaching Petitioner or his family in person;
- 22 • Engaging in any further acts of harassment.

23 For all the foregoing reasons, Petitioner respectfully requests that the Court grant all forms of
 24 relief authorized under California Code of Civil Procedure § 527.6, including but not limited to: a
 25 temporary restraining order and injunction prohibiting Respondent Desiree Guerriere Townsend from
 26 harassing, contacting, or approaching Petitioner Mario Lopez, his spouse, his children, his home, his
 27 workplace, or any location where he is present. Petitioner further requests that the Court issue an order
 28

1 enjoining Respondent from making, posting, or republishing any content on the internet—including
2 but not limited to TikTok, Reddit, Twitter (X), Instagram, LinkedIn, or any other platform—
3 concerning or referring to Mr. Lopez or his family, either directly or indirectly. Given the ongoing,
4 escalating, and delusional nature of her conduct, such an order is necessary to protect Mr. Lopez and
5 his family from further psychological harm, reputational damage, and the credible threat of future
6 escalation.

**DECLARATION OF COURTNEY LOPEZ IN SUPPORT OF REQUEST FOR CIVIL
HARASSMENT RESTRAINING ORDER (C.C.P. § 527.6)**

I, Courtney Lopez, declare:

1. I am an individual residing in Los Angeles County, California, and the wife of Mario Lopez. I submit this declaration in support of a request for a Civil Harassment Restraining Order against Desiree Guerriere Townsend, pursuant to California Code of Civil Procedure § 527.6.
2. Unless otherwise stated, the facts in this declaration are based on my personal knowledge. Where I lack direct knowledge, the information is stated on information and belief and I believe it to be true.
3. On Sunday, June 16, 2025—Father's Day—Ms. Townsend accompanied a process server to our family home to serve my husband with a civil lawsuit (LASC Case No. 25NNCV04089). My husband and our small children were present when this occurred.
4. The process server approached our home gate and attempted to serve my husband in front of our children. Ms. Townsend stood nearby, observing the service. Our children were frightened and confused. What should have been a joyful, private family moment turned into a deeply upsetting and chaotic scene.
5. Almost immediately after the service, Ms. Townsend posted a video online documenting the event. The video, which she published to her public TikTok account, shows identifiable features of our home and describes the service in inflammatory terms. This video has since gone viral and continues to be shared online, exposing our family's location and private life to millions of strangers.
6. Since that day, I have lived in a constant state of anxiety. I worry about our children's safety and well-being. We have had to take additional security measures and restrict

1 where and how our children can play outside our home. I no longer feel safe at my
2 own residence.

3
4 7. Ms. Townsend's actions did not stop with that video. Over the past several months,
5 she has published numerous false and deeply disturbing statements about my husband
6 online. These include false accusations of sexual misconduct, claims that he is
7 dangerous, and attacks on his reputation and character. In doing so, she has targeted
8 not only him, but by extension, our entire family.

9
10 8. I believe Ms. Townsend's conduct is escalating. Her decision to physically show up at
11 our home, publish our location, and use that moment for public humiliation
12 demonstrates a complete disregard for our safety, privacy, and peace of mind. Her
13 online behavior has been obsessive and aggressive, and I fear she may return or
14 attempt further acts of intimidation.

15
16 9. I respectfully request that the Court issue a Civil Harassment Restraining Order to
17 protect my family and me. Specifically, I ask that Ms. Townsend be:

- 18 ○ Prohibited from contacting me, my husband, or our children, directly or
19 indirectly;
- 20 ○ Prohibited from coming within 100 yards of our home, workplace, or
21 children's school;
- 22 ○ Prohibited from filming, recording, or photographing any member of our
23 family or our residence;
- 24 ○ Ordered to refrain from publishing, reposting, or distributing any defamatory,
25 harassing, or inflammatory statements about our family online, including but
26 not limited to TikTok, Instagram, Reddit, and YouTube.

27 10. I never imagined that simply being married to someone in the public eye would
28 subject our children to this kind of fear and exposure. Ms. Townsend's conduct has

1 crossed every reasonable line. Her campaign of harassment has left me feeling unsafe,
2 exposed, and desperate for relief. I ask the Court to protect my family from further
3 harm.

4 I declare under penalty of perjury under the laws of the State of California that the foregoing
5 is true and correct.
6
7

8 Executed this 19th day of June, 2025, at Los Angeles, California.
9

10
11 /s/ Courtney Lopez

12 COURTNEY LOPEZ

13 Declarant
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**DECLARATION OF MARIO LOPEZ IN SUPPORT OF REQUEST FOR CIVIL
HARASSMENT RESTRAINING ORDER (C.C.P. § 527.6)**

I, Mario Lopez, declare:

1. I am an individual residing in Los Angeles County, California. I make this declaration in support of my request for a Civil Harassment Restraining Order against Desiree Guerriere Townsend, pursuant to California Code of Civil Procedure § 527.6.
2. Unless otherwise stated, the facts in this declaration are based on my personal knowledge. Where I lack direct knowledge, the information is stated on information and belief and I believe it to be true.
3. On Father's Day, June 16, 2025, Respondent personally accompanied a process server to my private residence to serve me with a civil lawsuit (LASC Case No. 25NNCV04089). I was at home with my young children at the time. The deliberate timing and method of service, in front of my children on a meaningful family holiday, caused significant emotional disruption, fear, and distress.
4. Respondent did not merely arrange for lawful service—she stood at the gate of my home while her process server confronted me in front of my children. I witnessed our kids become visibly frightened and confused, and the entire incident disrupted what should have been a peaceful family celebration.
5. Shortly thereafter, Respondent published a video on her public TikTok account showing footage from the service of process at my home. The video includes visual references to the exterior of my residence, making its location publicly identifiable. That video has since circulated widely, exposing my home and my family to millions of online viewers.
6. I am deeply concerned for the safety of my wife and children. Respondent's decision to publicize my private residence, and to weaponize the service of process for internet

1 content, has jeopardized our security. I have had to increase residential security and
 2 limit my children's outdoor activities as a direct result.

- 3 7. This is not the first instance of harassment by Respondent. She has repeatedly made
 4 false, inflammatory, and defamatory statements about me online, including
 5 accusations of serious criminal conduct and personal attacks against my character.
 6 These statements have gone viral, and the emotional toll on my family and me has
 7 been significant.
- 8 8. I fear that Respondent will continue to escalate her conduct unless the Court
 9 intervenes. Her obsessive pattern of behavior—spanning direct confrontations, public
 10 accusations, viral videos, and now showing up at my home—reflects an intent not just
 11 to litigate, but to humiliate, endanger, and provoke.
- 12 9. I respectfully request that the Court issue a Civil Harassment Restraining Order that
 13 includes the following relief:
- 14 ○ Prohibiting Respondent from contacting me, my wife, or our children directly
 15 or indirectly;
 - 16 ○ Prohibiting Respondent from coming within 100 yards of my home,
 17 workplace, or my children's school;
 - 18 ○ Prohibiting Respondent from filming, recording, or photographing me, my
 19 family, or our residence;
 - 20 ○ Enjoining Respondent from posting or republishing any defamatory, harassing,
 21 or inflammatory statements or content about me or my family on any online
 22 platform, including but not limited to TikTok, Instagram, Reddit, and
 23 YouTube.
- 24 10. I do not seek this relief lightly. I respect the rights of all people to speak freely and to
 25 seek legal remedies through proper channels. However, Respondent's conduct has far
 26 exceeded lawful boundaries. Her actions have created genuine fear and caused my
 27 family to live in a state of distress and hyper-vigilance. This Court's protection is
 28 essential to restoring our sense of safety.

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

Executed this 19th day of June, 2025, at Los Angeles, California.

/s/ Mario Lopez

MARIO LOPEZ

Declarant

Attachment 7b—Previous Harassment

Beginning in early 2025, and escalating rapidly in the months leading up to this filing, Ms. Desiree Guerriere Townsend has engaged in a pattern of obsessive and delusional conduct across social media platforms—including TikTok, Reddit, Twitter, and LinkedIn—directly targeting Mario Lopez and falsely accusing him of participating in a grand conspiracy with Paramount Global, CBS, and other media organizations to defame, discredit, and suppress her. These posts reflect not just harassment, but the kind of detached-from-reality fixation that creates a credible threat.

On March 23, 2025, Townsend tweeted from her account that she was “getting ahead of a disgusting media push Mario Lopez is planning against me,” and that she would be filing a defamation suit once she collected “defamatory statements” from his alleged PR team on Reddit. She then posted “two can play at this game fuckface @mariolopezviva,” followed by “how’s your new vagina bitch?”—language that is both aggressive and deeply unhinged .

By March 24, 2025, Townsend escalated to accusing Mr. Lopez of rape, tweeting, “no one seems disturbed that @mariolopezviva was accused in the 90s of raping teenage girls.”


On April 2, 2025, she published a video titled “How I will prove Mario Lopez defamed me,” in which she continued her baseless campaign of personal attacks on Mr. Lopez and his family .

On May 31, 2025, she posted a TikTok with the caption, “Lawsuit #3 drops Father’s Day. Mario Lopez, consider this your early gift. #LitigationShark.” That same day, she

mocked Mr. Lopez's religious Instagram post, stating: "God's plan won't save you from the consequences, Mario. God's soldier wears heels, files lawsuits and never misses her marks" .

By June 6, 2025, she posted another TikTok taunting: "Let's see if you guys can cover up my lawsuit next week against actor Mario Lopez too. Summons and conformed Complaint coming soon..." . On June 7, she appeared to post three separate TikToks filmed on the NBCUniversal lot using their WiFi, while publicly claiming she was using company resources to sue "NBC's Mario Lopez." She stated that her \$10 million lawsuit would go to "Women in Media" and declared herself "Hollywood's Destroyer" .

On June 8, she solicited help from the public, offering to pay "\$50/hour" to "serve Mario Lopez" in Los Angeles. This offer was made publicly via TikTok and raised real fears that she was mobilizing third parties to physically approach Mr. Lopez and his family .

On June 14, she wrote that her "Mario Lawsuit  " would "expose Paramount Next Week," and bizarrely blamed Mr. Lopez for causing problems at a shareholder meeting, calling him "Mario 'Tippy-toes' Lopez" . The next day, she published: "Townsend v. Lopez et al. POV Karma: when Mario Lopez orchestrates a smear campaign against you and instantly gets it returned to sender" .

On June 16, she posted video of Mr. Lopez being served on Father's Day, captioned with triumphal and mocking language. She followed this with several TikTok videos claiming he had defamed her and "cost [her] jobs," falsely alleging that his Instagram still contains defamatory content. In these comments, she claims he "used [her] for fame," "chased clout," and "cost [her] income" .

Simultaneously, on Reddit, using the account "FunctionTiny1302," Townsend posted dozens of vile and delusional accusations over a period of three months. These included:

- Claims that Mr. Lopez had to pay women for sex, committed "date rape" in the 1990s, and is friends with sex trafficker Andrew Tate
- That he had plastic surgery to feminize his appearance, including "vaginal rejuvenation" due to "roast beef" allegedly visible in gym shorts
- That he orchestrated a coordinated "astroturfing smear campaign" against her via Reddit and that his PR team is behind anonymous Reddit accounts attacking her credibility
- A statement that watching his film performance in The Journey: Absolution inspired her to "shave and bleach [her] buttohole" to get into Hollywood

She has called Mr. Lopez a "serial rapist," "grapist," "clown," and "D-list has-been" across multiple platforms and comment threads . In her LinkedIn posts, she accuses him of being part of a corporate conspiracy to suppress news of her lawsuit and influence insider trading at Paramount and CBS .

SHORT TITLE:

Mario Lopez vs. Desiree Townsend

CASE NUMBER

25STR003858

CH-100 Attachment: Petitioner's List of Exhibits

(This Attachment may be used with any Judicial Council form.)

Exhibits for Most Recent Incident of Harassment

Exhibit #1 Desiree Townsend Social Media Posts - This document is a chronological compilation of Ms. Townsend's public social media posts across multiple platforms in which she repeatedly targets and harasses Mario Lopez and his family, demonstrating a sustained and escalating pattern of defamatory and threatening conduct.

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

TikTok Videos

Date	Time	Description of post	Account handle	Link to Post
3/10/25	Not listed on TikTok	<p>'Pretty girls walk like this' song, Townsend walking to it in Fashion Island Orange County.</p> <p>In the comments she said on 5/23/25: "Frightening update: May 23. It's been almost 3 weeks & no single media outlet is covering this. How is no one covering the "Flu shot Cheerleader" filing \$100 million lawsuit against paramount? This proves the media lies & hides!"</p> <p>5/19 comment: "Inside Edition flat out admitted that they lied in 2010 segment. I have a letter from their defense council admitting this. Their attorneys</p>	@cheerleader4change	TikTok Link 1

		own admission will destroy them in court."		
4/22/25	Not listed on TikTok	Townsend walking towards the camera with caption "walking straight to court... hey CBS/Inside Edition... guess who now heads a law firm's litigation arm?"	@cheerleader4c hange	Link to TikTok 2
4/28/25	Not listed on TikTok	Captioned "CBS retaliates: Instagram deletes all my accounts", describing situation thinks Paramount/CBS went to Meta and had them delete accounts, including her Instagram account with 80 followers and the other with 5.	@cheerleader4c hange	Link to TikTok 3
5/25/25	Not listed on TikTok	Captioned "mass media coverup" describing trading spike about insider trading after her case	@cheerleader4c hange	Link to TikTok 4
5/31/25	Not listed on TikTok	Video of writing lawsuit captioned "lawsuit #3 drops Father's day. Mario Lopez, consider this your early	@cheerleader4c hange	Link to TikTok 5

		gift. #LitigationShark"		
5/31/25	Not listed on TikTok	Slideshow of 3 images: 1st image- Mario Lopez's caption on an Instagram post "We don't understand God's plan but he understands us...#StayPrayedUp" "God's plan won't save you from the consequences, Mario. God's soldier wears heels, files lawsuits and never misses her marks." Next slide- Townsend v. Paramount case, Last slide- Townsend v. Morrissey	@cheerleader4change	Link to TikTok 6
6/6/25	Not listed on TikTok	Captioned "Let's see if you guys can cover up my lawsuit next week against actor Mario Lopez too. Summons and conformed Complaint coming soon..."	@cheerleader4change	Link to TikTok 7
6/7/25	Not listed on TikTok	Captioned "Using NBC Universal's Wifi to Sue Mario Lopez...How's that for Full Circle"	@cheerleader4change	Link to TikTok 8
6/7/25	Not listed on	Captioned	@cheerleader4c	Link to TikTok 9

	TikTok	"Drafting a Lawsuit against NBC's Mario Lopez, while on NBC's lot, using NBC's wifi"	hange	
6/7/25	Not listed on TikTok	Captioned "How to Fix Hollywood... Women in Media lost their funding. My \$10M lawsuit against Mario Lopez? Every \$ will go to them."	@cheerleader4c hange	Link to TikTok 10
6/7/25	Not listed on TikTok	Captioned "Did you miss me? "Flu Shot Cheerleader as Hollywood's Destroyer..."	@cheerleader4c hange	Link to TikTok 11
6/8/25	Not listed on TikTok	Captioned "Los Angeles! Help me serve Mario Lopez. Will pay \$50/hour."	@cheerleader4c hange	Link to TikTok 12
6/11/25	Not listed on TikTok	Captioned "Mario Lopez Defamation Lawsuit: Drop Coming Soon"	@cheerleader4c hange	Link to TikTok 13
6/12/25	Not listed on TikTok	Image of Lopez at Universal Studios, Captioned "Mario Lopez: Dodging lawsuits like its cardio. Filming moved indoors to avoid service. When you're afraid of a 5'2 cheerleader and	@cheerleader4c hange	Link to TikTok 14

		her process server."		
6/12/25	Not listed on TikTok	Captioned "Will Paramount also Cover-up my Lawsuit against Mario? Townsend v. Paramount Global	@cheerleader4c hange	Link to TikTok 15
6/14/25	Not listed on TikTok	Captioned "Mario Lawsuit (bomb emoji) to expose Paramount Next Week... Just in time for the shareholder meeting. Paramount's real problem isn't Trump- it's Mario "Tippy-toes" Lopez".	@cheerleader4c hange	Link to TikTok 16
6/15/25	Not listed on TikTok	Captioned "Townsend v. Lopez et al. POV Karma: when Mario Lopez orchestrates a smear campaign against you and instantly gets it returned to sender..."	@cheerleader4c hange	Link to TikTok 17
6/16/25	Not listed on TikTok	Video of Mario Lopez being served on Father's Day	@cheerleader4c hange	Link to TikTok 18
6/16/25	Not listed on TikTok	Captioned "Why I filed the Lawsuits against Mario Lopez and	@cheerleader4c hange	Link to TikTok 19

		Paramount Global et al."		
6/16/25	Not listed on TikTok	Captioned "Paramount: you're next"	@cheerleader4change	Link to TikTok 20
6/17/25	Not listed on TikTok	Captioned "Why Paramount needs to be Broken Up..."	@cheerleader4change	Link to TikTok 21
6/17/25	12:25 pm	Captioned "Mario Lopez Under Investigation at NBCUniversal"	@cheerleader4change	Link to TikTok 22
6/17/25	6:28 pm	Captioned "Multiple Allegations Against Mario Lopez at NBCUniversal"	@cheerleader4change	Link to TikTok 23

Linkedin Posts

1 month ago- exact date not noted but likely around 5/17/25	Not listed on Linkedin	Paramount Global's earning call information- case number and complaint information included	@Desirée Guerrière Townsend https://www.linkedin.com/in/desiree-townsend/	Linkedin Post 1
4 weeks ago- exact date not noted but likely around 5/20/25	Not listed on Linkedin	Captioned "CBS fired her to cover their asses, meanwhile they are actively squashing stories about my case, allowing privilege individuals who happened on my page to insider	@Desirée Guerrière Townsend	Linkedin Post 2

		trade, and keeping investors in the dark about how bad Paramount's corporate governance and risk mitigation truly is.		
1 month ago- exact date not noted but likely around 5/17/25	Not listed on LinkedIn	Townsend's updated draft complaint for defamation against Paramount Global	@Desirée Guerrière Townsend	<u>Linkedin Post 3</u>
3 weeks ago- exact date not noted but likely around 5/27/25	Not listed on LinkedIn	Email to Trump Attorney Captioned "Paramount Global, CBS Broadcasting, and their subsidiary Inside Edition Inc. have been actively suppressing news coverage of my \$100 million defamation lawsuit. Why? To keep shareholders in the dark, engage in potential insider trading, and negotiate a lower settlement in President Trump's defamation case, without disclosing the explosive	@Desirée Guerrière Townsend	<u>Linked n Post 4</u>

		litigation they're hiding. So last night... I emailed all of President Trump's attorneys. Read the complaint here https://linktr.ee/defame "		
1 month ago- exact date not noted but likely around 5/17/25	Not listed on LinkedIn	FCC complaint	@Desirée Guerrière Townsend	<u>LinkedIn Post 5</u>
4 months ago	Not listed on LinkedIn	Captioned "It is not an accident they called me the Flu Shot Cheerleader. Time is running out to build a vaccine."	@Desirée Guerrière Townsend	<u>LinkedIn Post 6</u>
1 month ago- exact date not noted but likely around 5/17/25	Not listed on LinkedIn	Emails of proof of deactivation of Instagram accounts captioned "My Instagram accounts taken down a mere hours after corresponding with Inside Edition's legal counsel with my intent to move forward with a defamation lawsuit. Both benign and relatively inactive accounts, one with my platform for running for mayor, deleted at	@Desirée Guerrière Townsend	<u>LinkedIn Post 7</u>

		the same time. "		
4 weeks ago	Not listed on LinkedIn	Lawsuit post stating that no media outlets reported on her lawsuit	@Desirée Guerrière Townsend	<u>LinkedIn Post 8</u>
2 weeks ago	Not listed on LinkedIn	Looking for a litigation paralegal or assistant in Los Angeles to poach for her case	@Desirée Guerrière Townsend	<u>LinkedIn Post 9</u>
1 month ago	Not listed on LinkedIn	Claimed that a CBS attorney labeled her medical records as "talking points" in writing stated that "publicly dismissing medical evidence from a disabled woman isn't just bad optics, it's malpractice in public relations".	@Desirée Guerrière Townsend	<u>LinkedIn Post 10</u>
4 weeks ago	Not listed on LinkedIn	Restated the "talking points" claim and stated "I am willing to bet multiple insiders, sold stock or shorted the company based on this information. This is their undoing. The SEC and DOJ must investigate trades made by insiders in the previous 13	@Desirée Guerrière Townsend	<u>LinkedIn Post 11</u>

		days."		
4 weeks ago	Not listed on Linkedin	<p>Captioned "A \$100 Million Lawsuit You Can Profit Off Of! Since Paramount and CBS are suppressing this news, use it to your advantage to short the stock ahead of shareholders notification of this. This this is a great opportunity for traders to make significant profits ahead of any news coverage of this lawsuit. Typically, this is considered insider trading, but since the media is suppressing this public info, it's yours to profit off of.</p> <p>Disclaimer: This is not financial advice. Please consult with a financial advisor before making any investment decisions."</p>	@Desirée Guerrière Townsend	<u>Linkedin Post 12</u>
2 months ago	Not listed on Linkedin	<p>Captioned "Getting ahead of any disgusting media push Mario Lopez is planning against me to paint me</p>	@Desirée Guerrière Townsend	<u>Linkedin Post 13</u>

		as the villain for calling him out for defaming me. I will be filing a lawsuit against him once I gather all the defamatory statements made by who I think is his PR team on Reddit."		
--	--	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--	--

Twitter Posts

3/23/25	2:45 pm	Cross tweet from LinkedIn "Getting ahead of any disgusting media push Mario Lopez is planning against me to paint me as the villain for calling him out for defaming me. I will be filing a lawsuit against him once I gather all the defamatory statements made by who I think is his PR team on Reddit: "	@cheering4change	Twitter Link 1
4/2/25	1:18 pm	Video Captioned "How I will prove	@cheering4change	Twitter Link 2

		Mario Lopez defamed me" video attacking his character and family values		
3/24/25	1:46 pm	<p>Captioned "It's amazing that I have to provide my medical records to be believed and when I do, the amount of mental gymnastics conducted to continue to discredit and dismiss me is, well...crazy. I understand @MonicaLewinsky so much now. Yet no one seems disturbed that @mariolopezviva was accused in the 90s of raping teenage girls. @accesshollywood</p>	@cheering4change	<u>Twitter Link 3</u>
6/15/25	2:20 pm	<p>Video of Lopez being served on Father's Day, Captioned "Mario Lopez served my \$10 million defamation lawsuit today by Maria. Any monetary awards from the suit will be donated to</p>	@cheering4change	<u>Twitter Link 4</u>

		Women in Media a charity in Los Angeles. Thank you for your service Maria!"		
3/23/25	6:36 pm	Captioned "Oh GAWD I have no idea why @mariolopezviv a acting career tanked. "For a second I thought it was 9:23, but then I decided, no, no its 9:22" @accesshollywood You guys should replace this clown with Al." Video of RiffTrax: The Journey: Absolution (preview clip) attached to tweet	@cheering4change	<u>Twitter Link 5</u>
3/23/25	7:12 pm	Captioned "Oh gawd this was brutal to watch, but no wonder Mario Lopez can't get any decent movie gigs, his acting sucks as hard as the locker room scene from The Journey: Absolution. @lifetimetv Loser"	@cheering4change	<u>Twitter Link 6</u>
3/18/25	3:24 pm	"The pyramid of cancel culture protects those at the very top... Until those at the bottom fight	@cheering4change	<u>Twitter Link 7</u>

		back" Images of Mario Lopez, Bill Clinton, James Franco, Jenny McCarthy		
3/23/25	7:13 pm	Captioned "two can play at this game fuck face @mariolopezviva (middle finger emoji) Hey how's your new vagina bitch?"	@cheering4change	Twitter Link 8
6/16/25	8:29 pm	Reply "Except I was living my life as a private individual when he defamed me saying I faked an illness to millions of followers so HE could get clout. Explain to me how defending myself after he cost me jobs and income is chasing fame? I didn't ask him to post about me."	@cheering4change	Twitter Link 9
6/16/25	8:31 am	Reply "He cost me jobs!! That's why I am suing. How can I get a job when he has this defamatory statement still on his Instagram and a Google search by an employer pulls this up?! Wake up dumb ass."	@cheering4change	Twitter Link 10
6/16/25	8:33 am	Reply "He used me for fame and	@cheering4change	Twitter Link 11

		you're angry because I am fighting back?"		
6/15/25	7:59 pm	"No its there..." Images of Court order	@cheering4change	Twitter Link 12

Reddit Posts

Under username: **FunctionTiny1302**

3 months ago	Not listed on reddit	<p>Commented on a video with Mario Lopez acting in a show. "Mario Lopez when he allegedly had to pay women to have sex with him. After this he allegedly resorted to date rape, according to the two women accusers from the 1990s. One of the alleged accusers was a credible witness, but had waited too long to go to the police, thus the DA dropped the charges.</p> <p>Mario Lopez is friends with Andrew Tate too. He was seen hugging Tate at a UFC fight a mere days before Tate</p>	FunctionTiny1302	Reddit Post 1
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		<p>was accused of assaulting Brianna Stern at the Beverly Hills Hotel.</p> <p>Mario pretends to be a real stand up guy. He does Christmas family movies and selfies of him at church on ash Wednesday to make you think he is god fearing, but it's all a facade."</p>		
3 months ago	Not listed on reddit	<p>Another user writes Desiree? She comments "Yes, it's me and whoever Wise_Reception5478 is I am willing to bet he or she is part of Mario Lopez's PR team that has gone on an astroturfing rampage to defame me AGAIN to get ahead of my lawsuit against him."</p>	FunctionTiny1302	<u>Reddit Post 2</u>
3 months ago	Not listed on reddit	<p>Commented "Desiree here (formerly Jennings) no it was not functional neuro disorder, it was actually stiff person syndrome. I have high antibodies</p>	FunctionTiny1302	<u>Reddit Post 3</u>

		<p>to GAD, but no one ran the labs until several years after the fact. At the time this lab was run I was on years of IVIG and it was still showing high. I am speaking out more now because Mario Lopez from Access Hollywood defamed me, then when I called him out about two weeks ago, he started a smear campaign on Reddit (www.reddit.com/user/Top-Strategist-1261/). I am filing a defamation lawsuit against him shortly."</p> <p>Replied to herself "You know what the other messed up part is? In this sick country, I have to show my medical records to be believed and even when I show people these they do extreme mental gymnastics to find ways to discredit and dismiss me. Meanwhile, no one bats an eye to Mario Lopez</p>		
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		being accused of raping two teens in the 90s or hugging accused sex trafficker Andrew Tate."		
3 months ago	Not listed on reddit	<p>In reference to astroturfing Townsend says "It is what Blake Lively did to Justin Baldoni, allegedly. The way Mario Lopez is using it as a smear campaign to discredit me before I file a defamation lawsuit against him. Mario is the one that brought James Franco into this."</p> <p>In reference to her "beef with these guys" she says "Just a friendly competition. They are the Microsoft to my Apple."</p>	FunctionTiny1302	<u>Reddit Post 4</u>
3 months ago	Not listed on reddit	Commented "Mario Lopez is the reason I realized I needed to shave and bleach my butthole. After watching him act in The Journey: Absolution I realized that was the only way I was also going to get into	FunctionTiny1302	<u>Reddit Post 5</u>

		Hollywood."		
3 months ago	Not listed on reddit	On a rate Mario Lopez thread Townsend commented "I give him a 1 maybe a 1.5, sure he might have a symmetrical face, but he is a complete a-hole inside. Ever since his acting career completely bombed after Saved by the Bell, the best he can do is D-list holiday movies, because he has no useful skills other than reading off a teleprompter, which quite frankly AI can do better."	FunctionTiny130 2	<u>Reddit Post 6</u>
3 months ago	Not listed on reddit	Comments on post discussing Lopez's take on Britney Spear's father " "Mario is a giant douché bag. He has vagina envy. I heard through the grapevine that he had a vaginal rejuvenation that didn't turn out well, but he had to do it because the roast beef was starting to drag to his kneecap and you	FunctionTiny130 2	<u>Reddit Post 7</u>

		could see it coming out his gym shorts. I don't know how true this is, but I believe it!"		
3 months ago	Not listed on reddit	Commented "The court cherry-picked the records. If you actually read over the opinion there were multiple HIGH anti-GAD antibodies but the test was not run until years after the fact, which is why the court said it could not have been the vaccine, because no one thought to run the test in 2009 Mario. Hey I wonder where I can get the investigative report into your rape allegations from 1993, I bet I can get some real interesting details from that you has been D-list actor."	FunctionTiny130 2	<u>Reddit Post 8</u>
3 months ago	Not listed on reddit	Replied "You have no idea the hell I have been through. I have thought about suicide so many times I cannot even count. Including back in June of last year	FunctionTiny130 2	<u>Reddit Post 9</u>

		<p>when I lost business opportunities not know it was because Mario Lopez through his instagram defamed me to millions of followers: https://www.instagram.com/mariolopez/reel/C8Zx0QdpG9c/</p> <p>Then if that was not enough, 3 days later I discovered he had defamed me last year and called him out, he comes on here under Top-Strategy-126 1 to CONTINUE DEFAMING ME is beyond triggering: https://www.instagram.com/mariolopez/reel/C8Zx0QdpG9c/</p>		
3 months ago	Not listed on reddit	<p>Replied "This was me you flaming hot pile of garbage and no I was not faking it. I was a fucking NFL cheerleader why would I want to be known as a crippled?!! Does anyone ever use reasoning? What would my motives have</p>	FunctionTiny1302	<u>Reddit Post 10</u>

		<p>been to walk like a crippled and be made fun of? I mean come on, have you no fucking logic?</p> <p>I am not trying to erase anything, I was clearing the air on what happened to me so people would know what cons the anti-vaxxers are. And I am not privileged, I lost my job a month before this aired because Dr. Buttar died drumming up media interest and the biotech company I worked at, Outpace Bio in Seattle, found out I was in the media in 2009 then fired me. Which technically is firing someone for a disability."</p>		
3 months ago	Not listed on reddit	<p>Replied "None of the above, why would I want to be disabled instead of have a life as a NFL cheerleader who worked full time at a tech company making great money, owned my own home, to have be a full time crippled? It</p>	FunctionTiny1302	Reddit Post 11

		doesn't make sense because that was not my goal. I got sick, I was used by anti-vaxxers, and then everyone on the damn internet is too stupid to do any deductive reasoning or logical analysis."		
3 months ago	Not listed on reddit	Commented "Mario Lopez is such a girl. I heard a rumor that he had vaginal rejuvenation done a few years ago. His wife was apparently complaining that his was starting to look like roast beef. But who knows how true that is. I wish TMZ would look more into this."	FunctionTiny1302	<u>Reddit Post 12</u>

EXHIBIT B

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1 CASE NUMBER: 25STRO03858
2 CASE NAME: LOPEZ VS. TOWNSEND
3 LOS ANGELES, CALIFORNIA TUESDAY, AUGUST 5, 2025
4 DEPARTMENT 65 HON. KIMBERLY REPECKA, JUDGE
5 REPORTER: CAROLINA VIZCARRA, CSR NO. 14827
6 TIME: P.M. SESSION
7

8 APPEARANCES: THE PETITIONER, MARIO LOPEZ, PRESENT WITH
9 COUNSEL, ALEXANDRA KAZARIAN AND DANIEL TAPETILLO,
10 ATTORNEYS AT LAW; THE RESPONDENT, DESIREE TOWNSEND,
11 PRESENT, APPEARING IN PROPIA PERSONA.

12 -000-

13 THE COURT: COURT'S CALLING 17 ON CALENDAR;
14 25STRO03858, LOPEZ VERSUS TOWNSEND.

15 APPEARANCES, PLEASE.

16 MS. KAZARIAN: GOOD AFTERNOON, YOUR HONOR.
17 ALEXANDRA KAZARIAN FOR MR. LOPEZ ALONG WITH DANIEL
18 TAPETILLO FROM GERAGOS AND GERAGOS.

19 THE COURT: THANK YOU VERY MUCH.

20 AND THE RESPONDENT IS ALSO PRESENT.

21 MS. TOWNSEND: GOOD AFTERNOON, YOUR HONOR. YES.
22 RESPONDENT DESIREE TOWNSEND IS PRESENT.

23 THE COURT: GREAT. FANTASTIC. SO WE HAVE AN
24 ANTI-SLAPP MATTER FILED BEFORE THE RESTRAINING ORDER
25 CAN BE HEARD, AND MS. TOWNSEND DID FILE AND SERVE THAT.
26 WHILE THE NOTICE WAS NOT TIMELY, THE PETITIONER'S
27 WAIVING ANY DEFECT OF NOTICE SO WE CAN PROCEED TODAY.

28 MS. TOWNSEND, YOU HAVE FILED MOVING

1 PAPERS. WOULD YOU LIKE TO BE HEARD REGARDING ARGUMENT?

2 MS. TOWNSEND: YES, PLEASE.

3 THE COURT: GO AHEAD.

4 MS. TOWNSEND: THIS PETITION IS LARGELY AND
5 HEAVILY BASED ON PROTECTED SPEECH AND BASED OFF TWO
6 EVENTS: ONE EVENT IS THE FILING OF A DEFAMATION
7 LAWSUIT THAT I FILED AGAINST PETITIONER MARIO LOPEZ. I
8 HAVE SINCE FILED AN AMENDED COMPLAINT ON THAT AND IT'S
9 DETAILED WITHIN THE MOTION. AND AS PART OF THAT
10 LAWSUIT, THERE WAS A LAWFUL SERVICE OF PROCESS AND THAT
11 VIDEO IS ALSO INCLUDED WITHIN THE MOTION.

12 SECONDARILY, TO GO BACK TO THE PROTECTED
13 SPEECH, THE SECOND EVENT IS COMMENTARY IN VIDEOS IN
14 RELATION TO AN OMITTED PUBLIC FIGURE IN MATTERS OF
15 PUBLIC CONCERN, WHICH ARE PROTECTED UNDER THE FIRST
16 AMENDMENT. NONE OF THESE -- NONE OF THE COMMENTARY OR
17 POSTS OFFER ANYTHING THREATENING OR EVEN DEFAMATORY.
18 SO I BELIEVE THIS PETITION HAS BEEN BROUGHT IN BAD
19 FAITH, AND I WILL BE ABLE TO DEMONSTRATE THAT ONCE WE
20 GO THROUGH THE MOTION HERE.

21 THE COURT: OKAY. SO I DIDN'T UNDERSTAND THE
22 PETITION IS BEING BROUGHT IN RESPONSE TO THE DEFAMATION
23 LAWSUIT. AT LEAST THAT'S NOT WHAT'S BEING ALLEGED.

24 MS. TOWNSEND: SURE.

25 THE COURT: THE ALLEGED CONDUCT IS THE MANNER IN
26 WHICH THE SERVICE PROCESS HAPPENED. IT IS ALSO THE
27 VIDEO ABOUT MR. LOPEZ, WHO IS A PUBLIC FIGURE, AND YOU
28 INDICATED THAT THERE'S NOTHING THREATENING AND NOTHING

1 DEFAMATORY. SO I THINK THAT THE PETITIONER WILL
2 PROBABLY TAKE ISSUE WITH THE SECOND PART OF THAT.

3 WAS THERE ANYTHING ADDITIONAL YOU WANTED
4 TO BE HEARD ON RELATED TO YOUR MOTION BEFORE I TURN TO
5 THEM?

6 MS. TOWNSEND: NOT AT THIS MOMENT.

7 THE COURT: OKAY.

8 GO AHEAD.

9 MS. KAZARIAN: THANK YOU, YOUR HONOR.

10 MS. TOWNSEND PURPORTS TO BE A LEGAL PROFESSIONAL, A
11 CERTIFIED PARALEGAL, I BELIEVE, AND AS SUCH, SHE SHOULD
12 KNOW THAT BEING A PARTY TO A LAWSUIT PREVENTS YOU FROM
13 BEING A PART OF SERVING A LAWSUIT. AND SO SHE CLAIMS
14 THAT HER ACTIVITIES ARE PROTECTED IN GOING TO
15 MR. LOPEZ'S HOME AND VIDEOTAPING HIS HOME AND HIS
16 FAMILY BECAUSE SHE WAS INVOLVED IN SERVING THE LAWSUIT
17 HERSELF; HOWEVER, SHE'S A PARTY.

18 THE COURT: SO SHE DIDN'T ACTUALLY DO THE SERVICE
19 HERSELF. IS THERE SOME LAW THAT PREVENTS HER FROM
20 BEING PRESENT WHILE IT'S BEING SERVED?

21 MS. KAZARIAN: WELL, I DON'T THINK THERE WAS ANY
22 VALID REASON FOR HER TO BE PRESENT. I DON'T THINK THAT
23 -- IF SHE'S HIRING A PROCESS SERVER, THE PROCESS
24 SERVER'S JOB IS TO SERVE THE LAWSUIT. SO IN THIS
25 CIRCUMSTANCE, THE FACT THAT SHE WAS PRESENT HERSELF TO
26 SERVE THIS LAWSUIT THAT IN IT OF ITSELF HAS JUST VERY
27 WANDERING, MEANDERING, CONCERNING LANGUAGE, AS FAR AS
28 MR. LOPEZ IS CONCERNED.

1 THE FACT THAT SHE ACTUALLY FOUND HIS HOME
2 ADDRESS, CAME TO HIS HOME ADDRESS, VIDEOTAPED HIM AND
3 ALSO SPOKE TO HIS CHILDREN IN ORDER TO LURE MR. LOPEZ
4 OUT. THAT IS INFORMATION THAT I'M NOT SURE IS IN THE
5 DECLARATION --

6 THE COURT: I DON'T THINK IT WAS. I DON'T THINK
7 I SAW THAT.

8 MS. KAZARIAN: SO THAT WILL BE PROVIDED TO THE
9 COURT THROUGH TESTIMONY.

10 THE COURT: SO IT CAN'T BE IN THE ANTI-SLAPP
11 MATTER.

12 MS. KAZARIAN: UNDERSTOOD. BUT THE COURT IS
13 CORRECT. THIS IS NOT A FILING BASED ON THE FILING OF
14 HER LAWSUIT. THIS IS NOT A RETALIATORY ACTION BECAUSE
15 OF THE FILING OF THE LAWSUIT ITSELF, BUT WHAT MS.
16 TOWNSEND DID WAS TAKE THAT VIDEO -- IF THE PURPOSE OF
17 BEING PRESENT FOR SERVICE OF PROCESS AND TAKING THE
18 VIDEO WAS TO PROVE THAT HE WAS SERVED, THEN THE CONCERN
19 BECOMES, WHY DID SHE POST IT ON TWITTER -- I'M SORRY.
20 ON TIKTOK? WHY WOULD SHE POST A VIDEO OF HIS PRIVATE
21 RESIDENCE WITH HIS CHILDREN ON TIKTOK FOR THE PUBLIC TO
22 SEE, IDENTIFYING HIS HOME? SHE TITLED IT, "HAPPY
23 FATHER'S DAY." IT WAS VERY OBVIOUSLY MEANT TO HARASS
24 HIM. THIS WAS NOT LEGAL PROOF OF SERVICE. THE VIDEO
25 ITSELF WAS NOT ATTACHED TO THE LAWSUIT IN ORDER TO
26 PROVE THAT SERVICE WAS FILED. IT WAS MEANT TO
27 HUMILIATE HIM. IT WAS MEANT TO INSULT HIM AND IT WAS
28 MEANT TO BE RETALIATORY. AND THERE HAVE BEEN MANY,

1 MANY POSTS THAT MS. TOWNSEND HAS POSTED TO THE INTERNET
2 SINCE THAT TALK SPECIFICALLY ABOUT THE FACT THAT
3 EVERYTHING THAT SHE'S DOING, THESE VIDEOS THAT SHE'S
4 DOING ARE FOR REVENGE AND THAT THEY ARE MEANT TO
5 HUMILIATE MR. LOPEZ.

6 THERE ARE ALLEGATIONS OF -- ABOUT HIS
7 PRIVATE BODY PARTS THAT SHE'S POSTED. THERE ARE
8 REQUESTS TO THE PUBLIC -- ALSO, SHE WAS, I BELIEVE,
9 BEFORE HE WAS ACTUALLY SERVED, SHE POSTED THAT SHE
10 WOULD PAY \$50 DOLLARS AN HOUR FOR PEOPLE IF THEY WERE
11 ABLE TO SERVE HIM THEMSELVES. SO THERE WAS A CALL TO
12 ACTION AGAINST MR. LOPEZ AND A REQUEST FOR HIS PRIVATE
13 INFORMATION TO BE POSTED TO THE INTERNET. SO --

14 THE COURT: WHAT WAS THE CALL FOR HIS PRIVATE
15 INFORMATION TO BE POSTED TO THE INTERNET?

16 MS. KAZARIAN: SHE MADE A POST SAYING THAT SHE
17 WOULD PAY \$50 DOLLARS FOR ANYBODY WHO WAS ABLE TO SERVE
18 HIM.

19 THE COURT: OKAY.

20 MS. KAZARIAN: AND IT'S IN MY DECLARATION AS
21 WELL, BUT --

22 MS. TOWNSEND: CAN YOU TELL ME WHAT PAGE THAT'S
23 ON?

24 THE COURT: CAN YOU TELL THE COURT WHAT PAGE IT'S
25 ON?

26 MS. KAZARIAN: I CAN'T. MS. TOWNSEND IS SAYING
27 THAT BECAUSE THERE'S NO PAGE NUMBERS ON THAT
28 DECLARATION.

1 THE COURT: OH. I SEE.

2 MS. KAZARIAN: BUT I DO BELIEVE THAT OUR
3 DECLARATIONS THAT HAVE BEEN SUBMITTED AS PART OF THE
4 RESTRAINING ORDER DO SATISFY ALL OF THE REQUIREMENTS IN
5 STEP TWO OF THE ANTI-SLAPP CONSIDERATIONS. AND, AGAIN,
6 MR. -- ALSO MR. LOPEZ IS NOT ASKING FOR MS. TOWNSEND'S
7 FIRST AMENDMENT SPEECH TO BE QUIETED OR TO BE AFFECTED
8 IN ANY WAY BY THIS COURT. OF COURSE, IF THERE IS
9 PUBLIC POSTINGS THAT ARE RELEVANT, IF THERE'S PUBLIC
10 SPEECH, NOBODY'S ASKING THAT SHE BE STOPPED FROM THAT.
11 IT'S THE HARASSING BEHAVIOR THAT HAS HAPPENED OVER AND
12 OVER AND OVER AGAIN. THAT'S THE SUBJECT. AND
13 ADDITIONALLY --

14 THE COURT: WELL, SO THE REQUEST IS FOR, "ORDERS
15 ENJOINING RESPONDENT FROM POSTING, REPOSTING,
16 COMMENTING ON, OR OTHERWISE PUBLISHING ANY STATEMENTS
17 ABOUT ME OR MY FAMILY, DIRECTLY OR INDIRECTLY ON ANY
18 PUBLIC PLATFORM, INCLUDING AND NOT LIMITED TO" -- WELL,
19 ALL OF THE PLATFORMS.

20 HOW IS THAT NOT JUST RESTRICTING HER FROM
21 HARASSMENT?

22 MS. KAZARIAN: THAT I UNDERSTAND. WHAT WE ARE
23 FOCUSSED ON, AND LET ME REFOCUS THIS, THEY WERE ASKING
24 FOR NO HARASSING POSTINGS.

25 THE COURT: OKAY. SO I'M PROBABLY MOST CONCERNED
26 ABOUT THE POSTS THAT SOUNDED LIKE THEY LIKELY ARE
27 DEFAMATORY BECAUSE THEY'RE SPECIFICALLY TALKING ABOUT
28 MR. LOPEZ'S GENITALS, WHICH SEEMS LIKE IT'S NOT A

1 MATTER OF PUBLIC INTEREST OR NOT FOUNDED IN ANY SORT OF
2 NEWS STORIES. I UNDERSTAND THAT THERE HAVE BEEN
3 ALLEGATIONS AGAINST HIM IN THE '90S, AND THAT MAY BE A
4 LEGITIMATE THING THAT PEOPLE CAN DISCUSS AS HE'S A
5 PUBLIC FIGURE.

6 BUT I REALLY DO QUESTION, MS. TOWNSEND,
7 THE LEGITIMACY OF THOSE PARTICULAR POSTS, IF YOU WOULD
8 LIKE TO RESPOND TO THAT.

9 MS. TOWNSEND: YES. I WOULD LOVE TO. I'M TRYING
10 TO FIND THE PAGE THAT SHE HAD PARTICULARLY REFERENCED.

11 CAN YOU PROVIDE ME WITH WHERE THAT WAS IN
12 YOUR DECLARATION?

13 THE COURT: SO THAT WAS IN MR. LOPEZ'S
14 DECLARATION.

15 MS. TOWNSEND: I BELIEVE SHE HAD REFERENCED THE
16 COMMENT IN ONE OF THE EXHIBITS, I BELIEVE. I THINK THE
17 CONTEXT WOULD PROVIDE SOME ADDITIONAL INFORMATION TO
18 SHOW THAT IT WAS MORE RHETORICAL SATIRE THAN ACTUAL
19 DEFAMATION, BUT I NEED TO BE ABLE TO FIGURE OUT WHERE
20 THIS WOULD BE WITHIN THE PETITION.

21 SO CAN YOU, COUNSEL, DIRECT ME ON WHERE I
22 COULD FIND THIS PARTICULAR COMMENT YOU'RE REFERENCING?

23 MS. KAZARIAN: THEY'RE YOUR POSTINGS.

24 MS. TOWNSEND: JUST IF YOU CAN SHOW ME IN THE
25 PETITION, SPECIFICALLY.

26 THE COURT: SO SHE DOESN'T NEED TO TELL YOU --

27 MS. TOWNSEND: I THINK I FOUND IT.

28 THE COURT: OKAY. GREAT.

1 MS. TOWNSEND: I BELIEVE THIS IS WHAT SHE IS
2 REFERENCING. SO IN, I BELIEVE, IT'S THE LAST PAGE OF
3 THE BRIEF BEFORE IT GOES INTO THE -- AND I APOLOGIZE
4 FOR THIS, YOUR HONOR, BUT THAT HE HAD -- AND THIS IS
5 FROM THE PETITION, "THAT HE HAD PLASTIC SURGERY TO
6 FEMINIZE HIS APPEARANCE INCLUDING VAGINAL REJUVENATION
7 DUE TO ROAST BEEF ALLEGEDLY VISIBLE IN HIS GYM SHORTS."
8 SO, AGAIN, AS I HAD OUTLINED IN THE MOTION, A LOT OF
9 WHAT THEY ARE REFERENCING, IF YOU SEE WHAT'S IN
10 QUOTATIONS, IS NOT THE ACTUAL FULL QUOTE. SO A LOT OF
11 WHAT THEY HAVE REFERENCED ARE PIECES OF THE ORIGINAL
12 QUOTE OR THE ORIGINAL COMMENT THAT LEAVE OUT THE --
13 THAT IT WAS LARGELY SATIRE OR MADE IN A JOKING WAY
14 WITHOUT BEING DEFAMATORY. SO IF YOU LOOK AT HOW IT'S
15 WRITTEN IN THE PETITION, IT'S CLEARLY MISSING THE
16 ENTIRE POST. SO THAT'S WHY I WAS HOPING SHE HAD
17 OUTLINED IT HERE, BUT I HAD PLACED THAT IN MY MOTION,
18 THAT A LOT OF WHAT HAS BEEN ALLEGED THAT IS DEFAMATORY,
19 THE QUOTES THAT THEY HAVE IN THE PETITION, THAT HE'S A
20 SERIAL RAPIST, RAPIST, CLOWN, D-LIST, HAS-BEEN, THOSE
21 QUOTES ARE MISSING THE FULL CONTEXT OF WHAT WAS
22 ACTUALLY POSTED, AND UNFORTUNATELY, I DON'T KNOW WHERE
23 THE FULL POST IS. THEY DIDN'T INCLUDE IT IN THE
24 PETITION, BUT LARGELY THOSE POSTS WERE NOT DEFAMATORY
25 AT ALL, IF YOU COULD ACTUALLY READ THE POSTS IN ITS
26 ENTIRETY AND HAVE THE FULL CONTEXT OF IT.

27 MS. KAZARIAN: I DO, YOUR HONOR, IF THE COURT
28 WOULD LIKE TO HEAR THE ENTIRETY OF THE POST?

1 THE COURT: I DON'T THINK THAT THAT'S ACTUALLY
2 NECESSARY AT THIS STAGE. WE ARE LIMITED TO THE
3 PLEADINGS AND WHAT'S BEEN FILED.

4 MS. KAZARIAN: IT IS. IT'S FILED AS AN EXHIBIT.

5 THE COURT: OKAY. IN THAT CASE, PLEASE DIRECT ME
6 TO IT.

7 MS. KAZARIAN: IT'S ACTUALLY PAGE 46. IT'S IN
8 THE EXHIBIT --

9 THE COURT: THIS IS THE TABLE?

10 MS. KAZARIAN: IT IS THE TABLE.

11 THE COURT: OKAY.

12 MS. KAZARIAN: AND I APOLOGIZE THAT THE PAGE
13 NUMBERS SEEM TO HAVE BEEN CUT OFF WHEN THIS WAS FILED,
14 BUT I CAN TELL YOU THAT IT IS ON THE DATE OF -- WELL,
15 IT SAYS THREE MONTHS AGO. UNFORTUNATELY REDDIT DIDN'T
16 HAVE THE EXACT DATE.

17 LET'S SEE. REDDIT POSTING, THREE MONTHS
18 AGO. THE COMMENT IS, "MARIO IS A GIANT DOUCHEBAG. HE
19 HAS VAGINA ENVY. I HEARD THROUGH THE GRAPEVINE THAT HE
20 HAD A VAGINAL REJUVENATION THAT DIDN'T TURN OUT WELL,
21 BUT HE HAD TO DO IT BECAUSE THE ROAST BEEF WAS STARTING
22 TO DRAG TO HIS KNEECAP, AND YOU COULD SEE IT COMING OUT
23 OF HIS GYM SHORTS. I DON'T KNOW HOW TRUE THIS IS, BUT
24 I BELIEVE IT."

25 THE COURT: OKAY. SO I THINK WE HAVE THE FULL
26 CONTEXT FROM THAT NOW.

27 MS. TOWNSEND: YES.

28 THE COURT: IS THERE ANYTHING ADDITIONAL THAT YOU

1 WANTED TO ADD IN DEFENSE OF YOUR ANTI-SLAPP MOTION?

2 MS. TOWNSEND: AGAIN, I THINK THE FULL CONTEXT OF
3 THAT QUOTE IS SOMETHING THAT YOU COULD OR WOULD EASILY
4 SEE ON SOMETHING LIKE JIMMY KIMMEL OR ANOTHER COMEDY
5 SHOW. I NEVER FULLY ALLEGED, AND THE COMMENT ITSELF IS
6 SO OUTRAGEOUS THAT NO REASONABLE PERSON IS GOING TO
7 OBJECTIVELY BELIEVE THAT. SO BY IT'S FACE, IT IS NOT
8 DEFAMATORY, AND SO I DON'T BELIEVE THAT THAT OR ANY OF
9 THE OTHER COMMENTS THAT HAVE BEEN ALLEGED IN THE
10 PETITION WARRANT THE SUPPRESSION OF MY FREE SPEECH
11 BASED ON SOMETHING THAT'S CLEARLY MEANT TO BE
12 RHETORICAL AND TO BE FUNNY AND NOT DEFAMATORY.

13 THE COURT: OKAY. ALL RIGHT. THE COURT'S
14 PREPARED TO RULE ON THE ANTI-SLAPP MATTER, AND I'M
15 FINDING THAT THE RESPONDENT -- OR PETITIONER, AS TO THE
16 ANTI-SLAPP MATTER, HAS MET HER BURDEN AS TO THE FIRST
17 PROBLEM, WHICH IS TO SAY THAT DISCUSSION OF A PUBLIC
18 FIGURE, GENERALLY, IS AN ISSUE OF PUBLIC INTEREST;
19 HOWEVER, THE SECOND PROBLEM IS WHETHER OR NOT THE
20 PETITIONERS HAVE A REASONABLE LIKELIHOOD OF PREVAILING
21 ON THE MERITS, AND I'M FINDING THAT YOU HAVEN'T MET THE
22 SECOND PROBLEM, MS. TOWNSEND, OF SHOWING THAT THEY
23 DON'T HAVE REASONABLE LIKELIHOOD OF PREVAILING, IN
24 PART, BECAUSE A TEMPORARY RESTRAINING ORDER HAS ALREADY
25 BEEN GRANTED IN THIS CASE AND THAT IS A VERY, VERY
26 HEAVY FACTOR THAT WEIGHS IN FAVOR OF THEM.

27 THE CITATION "ROBINZINE VERSUS VICORY, 143
28 CAL. APP. 4TH, 1416," HAS SOME FURTHER GUIDANCE ON THAT

1 PARTICULAR PRINCIPLE, BUT AT THIS STAGE, THEY ONLY NEED
2 TO SHOW THAT ON A PRIMA FACIE BASIS, THEY HAVE A
3 LIKELIHOOD OF PREVAILING, AND WHEN YOU MAKE ARGUMENTS
4 ALONG THE LINES OF, "IF YOU HAVE THE FULL CONTEXT,
5 YOU'LL UNDERSTAND THAT IT'S SATIRE.," ALL OF THAT MAKES
6 IT SOUND LIKE, WELL, YOU DON'T PREVAIL UNDER A SUMMARY
7 MOTION, WHICH IS WHAT AN ANTI-SLAPP MOTION IS.

8 SO THE ANTI-SLAPP IS DENIED.

9 ARE WE PREPARED TO PROCEED?

10 MS. KAZARIAN: YES.

11 THE COURT: OKAY.

12 MS. TOWNSEND: YOUR HONOR, I'D LIKE TO REQUEST A
13 CONTINUANCE. SO SINCE THE HEARING ON JULY 11TH,
14 THERE'S BEEN SIGNIFICANT DEVELOPMENTS WITHIN MY FIRST
15 OPPOSITION THAT WAS FILED. SO I'D LIKE LEAVE TO
16 PREPARE AND FILE A SUPPLEMENTAL OPPOSITION.

17 THE COURT: SO BECAUSE YOU'VE ACTUALLY FILED AN
18 OPPOSITION ALREADY, YOU'RE NOT ENTITLED TO A
19 CONTINUANCE.

20 MS. TOWNSEND: FAIR ENOUGH.

21 THE COURT: I DON'T KNOW IF WE'LL ACTUALLY
22 CONCLUDE TODAY. WE ONLY HAVE ABOUT AN HOUR LEFT IN THE
23 DAY, BUT WE'LL BEGIN.

24 MS. TOWNSEND: OKAY.

25 MS. KAZARIAN: THE PETITIONER WOULD LIKE TO CALL
26 COURTNEY LOPEZ.

27 THE COURT: AND OTHER THAN THE PETITIONER
28 HIMSELF, ARE THERE ANY OTHER WITNESSES IN THE

1 COURTROOM?

2 MS. KAZARIAN: NO, YOUR HONOR.

3 THE COURT: OKAY.

4 THE JUDICIAL ASSISTANT: MA'AM, PLEASE RAISE YOUR
5 RIGHT HAND. DO YOU SOLEMNLY STATE UNDER PENALTY OF
6 PERJURY THAT THE TESTIMONY YOU MAY GIVE IN THE CAUSE
7 NOW PENDING BEFORE THIS COURT SHALL BE THE TRUTH, THE
8 WHOLE TRUTH, AND NOTHING BUT THE TRUTH?

9 THE WITNESS: YES.

10 THE JUDICIAL ASSISTANT: THANK YOU. HAVE A SEAT
11 IN THE WITNESS STAND, PLEASE, AND IF YOU CAN SCOOT
12 YOURSELF UP CLOSE ENOUGH TO THE MICROPHONE.

13 PLEASE STATE AND SPELL YOUR FIRST AND LAST
14 NAME FOR THE RECORD.

15 THE WITNESS: MY NAME IS COURTNEY LOPEZ,
16 C-O-U-R-T-N-E-Y L-O-P-E-Z.

17 THE COURT: ALL RIGHT. MS. LOPEZ, HAVE YOU EVER
18 TESTIFIED IN COURT BEFORE?

19 THE WITNESS: I HAVE NOT.

20 THE COURT: OKAY. SO JUST REMEMBER TO GIVE
21 VERBAL ANSWERS, "YES" OR "NO," NOT "UH-HUH" OR "UH-UH"
22 BECAUSE THAT WILL NOT COME UP ON THE TRANSCRIPT.

23 THE WITNESS: OKAY.

24 THE COURT: SOMETIMES YOU MAY THINK THAT YOU KNOW
25 HOW A QUESTION IS GOING TO END ALREADY. PLEASE WAIT
26 FOR THE END OF THE QUESTION SO THAT NO ONE'S TALKING
27 OVER EACH OTHER. IT CAUSES A PROBLEM FOR THE RECORD.
28 AND MAKE SURE THAT YOU LISTEN CAREFULLY TO THE QUESTION

1 AND ONLY ANSWER THE QUESTION THAT IS BEING ASKED.
2 DON'T VOLUNTEER EXTRA INFORMATION UNLESS SOMEONE ASKS
3 YOU FOR IT.

4 THE WITNESS: OKAY.

5 THE COURT: ALL RIGHT.

6 LET'S GO AHEAD.

7 MS. KAZARIAN: THANK YOU.

8

9 DIRECT EXAMINATION

10 BY MS. KAZARIAN:

11 Q GOOD MORNING, MS. LOPEZ.

12 A GOOD MORNING.

13 Q DO YOU -- WELL, BEFORE THE INITIATION OF --
14 WELL, LET'S SEE. BEFORE FATHER'S DAY ON JUNE 16TH OF
15 THIS YEAR, DID YOU KNOW A PERSON BY THE NAME OF DESIREE
16 TOWNSEND?

17 A I WAS AWARE OF WHO SHE WAS BECAUSE OF THE
18 THINGS SHE WAS POSTING ON TIKTOK.

19 Q AND HOW DID YOU BECOME AWARE OF WHAT SHE WAS
20 POSTING ON TIKTOK?

21 A MY SISTER ACTUALLY HAD SENT ME SOMETHING THAT
22 CAME UP IN HER TIMELINE ON TIKTOK.

23 Q AND WHAT WAS THAT? WHAT DID YOU SEE ON
24 TIKTOK?

25 A IT WAS JUST DESIREE BASICALLY THREATENING TO
26 SUE MARIO FOR THE POST.

27 Q AND WHEN YOU SAY "THE POST," ARE YOU TALKING
28 ABOUT A POST THAT MARIO HAD POSTED?

1 A YES. SOMETHING THAT HE POSTED A YEAR AGO.

2 Q OKAY. AND HOW DID -- THE INITIAL TIKTOK POST
3 THAT YOU SAW, OF MS. TOWNSEND, HOW DID THAT MAKE YOU
4 FEEL?

5 A I DIDN'T EVEN KNOW WHAT POST SHE WAS TALKING
6 ABOUT. I NEVER HEARD OF HER. SO I DIDN'T EVEN KNOW
7 WHAT SHE WAS TALKING ABOUT WHEN I SAW THE POST. SO,
8 YOU KNOW, DID MY DUE DILIGENCE AND FIGURED IT OUT, BUT
9 THEN I JUST THOUGHT SHE WAS JUST A CLOUT CHASER AND
10 JUST WANTED SOME ATTENTION AND JUST KIND OF PUT IT OUT
11 OF MY MIND.

12 Q OKAY. DID YOUR VIEW OF MS. TOWNSEND CHANGE ON
13 FATHER'S DAY, JUNE 16TH, 2025?

14 A YES.

15 Q WHY?

16 A THE FACT THAT --

17 Q SORRY. WHAT HAPPENED?

18 A WELL, THE FACT THAT SHE CAME TO MY HOME, AND I
19 DON'T KNOW HOW MANY TIMES SHE WAS THERE PRIOR TO THAT.
20 THERE WERE MULTIPLE PEOPLE WITH HER. SHE SPOKE TO MY
21 11-YEAR-OLD SON ON THE SIDEWALK AND LURED HIM TO GET MY
22 HUSBAND OUT OF THE HOUSE BY ASKING HIM QUESTIONS THAT
23 SHE ALREADY KNEW, ABOUT THE CAR THAT MY HUSBAND DROVE.
24 SO MY 11-YEAR-OLD SON JUST SAID -- WAS ANSWERING HER
25 BECAUSE HE'S POLITE, AND HE SAID, "YES. YES."

26 Q LET'S TAKE THAT PIECE BY PIECE. EXPLAIN TO ME
27 WHAT YOU'RE TALKING ABOUT WITH YOUR 11-YEAR-OLD SON.

28 A SO MY SON AND HIS WRESTLING COACH WERE LOADING

1 THE CAR BECAUSE THEY WERE ON THEIR WAY TO A WRESTLING
2 CAMP. SO WHEN THEY CAME OUT OF THE GATE, SHE SAW THEM,
3 AND SHE BEELINED TOWARDS THEM WITH THE OTHER PERSON
4 THAT SHE WAS USING TO HELP SERVE --

5 Q HOW DO YOU KNOW THAT THAT HAPPENED?

6 A WE HAVE IT ON VIDEO, AND SHE POSTED IT.

7 Q OKAY.

8 A WE HAVE CAMERAS AT THE HOUSE.

9 Q WHAT HAPPENED NEXT AFTER SHE WENT UP TO THEM?

10 A SHE WENT UP TO MY SON AND ASKED HIM, "DOES
11 YOUR DAD DRIVE A BLACK AUDI?" AND HE SAID, "YES." AND
12 SHE SAID, "WELL, I THINK HE WAS INVOLVED IN A
13 HIT-AND-RUN," AND THE WRESTLING COACH SAID, "I DON'T
14 THINK HE WENT ANYWHERE THIS MORNING. I DON'T THINK HE
15 LEFT THE HOUSE." SO HE TOLD MY SON, "WELL, GO IN AND
16 GET YOUR DAD." THAT'S WHEN MARIO CAME OUT AND SAW HER
17 AND KNEW WHO THAT WAS BECAUSE WE'VE SEEN ALL OF HER
18 TIKTOKS.

19 Q HAS YOUR SON SPOKEN TO YOU ABOUT THAT INCIDENT
20 AT ALL?

21 A YES. MY SON THOUGHT HE WAS IN TROUBLE BECAUSE
22 HE ANSWERED HER, AND HE THOUGHT HE DID SOMETHING WRONG.
23 AND NOW HE DOESN'T WANT TO BE OUTSIDE AND PLAY WHERE
24 THE BASKETBALL HOOP IS BECAUSE HE'S AFRAID OF RANDOM
25 PEOPLE COMING UP AND ASKING HIM STUFF.

26 Q AND HOW HAS THAT MADE YOU FEEL SINCE? HAVE
27 YOU CHANGED AT ALL SINCE THAT INCIDENT?

28 A YEAH. I MEAN, I DON'T LET MY KIDS OUTSIDE. I

1 DON'T EVEN LIKE TO GO OUTSIDE. WE ARE CHANGING THINGS
2 TO OUR FENCES AND OUR SECURITY SYSTEM. IT JUST SHOWS
3 YOU HOW ANYBODY COULD JUST DO WHAT THEY WANT AND THINK
4 THEY CAN GET AWAY WITH IT.

5 Q DID IT IMPACT YOUR SUMMER VACATION AT ALL?

6 A WELL, IT IMPACTED OUR SUMMER WITH OUR KIDS
7 BECAUSE THEY DIDN'T WANT -- I WON'T LET THEM GO
8 ANYWHERE. WE HAD TO HIRE A RETIRED POLICE OFFICER TO
9 TAKE THEM AROUND SIX FLAGS. SO THINGS ARE NOT THE SAME
10 FOR THEM.

11 Q SINCE JUNE 16TH, 2025, HAVE THERE BEEN ANY
12 OTHER INCIDENTS THAT ARE RELATED TO MS. TOWNSEND THAT
13 HAVE CAUSED YOU EITHER ANXIETY OR ANY OTHER KINDS OF
14 FEELINGS?

15 A I MEAN, SHE'S ALL OVER SOCIAL MEDIA CALLING MY
16 HUSBAND A SEXUAL PREDATOR AND --

17 MS. TOWNSEND: OBJECTION, YOUR HONOR.

18 THE COURT: SORRY.

19 WHAT'S THE LEGAL OBJECTION?

20 MS. TOWNSEND: THERE IS NO EVIDENCE OF ME CALLING
21 HIM -- OR HER HUSBAND A SEXUAL PREDATOR. NOT IN THE
22 PETITION AND NOT IN MY MOTION.

23 THE COURT: SO THAT'S NOT A LEGAL OBJECTION.
24 THAT'S SOMETHING YOU CAN CROSS-EXAMINE HER ON.

25 MS. TOWNSEND: FAIR ENOUGH. THANK YOU.

26 THE COURT: ALL RIGHT. SO OVERRULED.

27 CONTINUE.

28 BY MS. KAZARIAN:

1 Q SO YOU SAID THERE WERE TIKTOKS THAT HAVE UPSET
2 YOU?

3 A JUST MULTIPLE TIKTOKS AND THEN BACK TO WHEN
4 SHE SERVED ON FATHER'S DAY, SHE POSTED MY SON ON THE
5 VIDEO AND THEN WAS CLAIMING ALL OF THESE CRAZY THINGS
6 THAT MY HUSBAND WAS SHUTTING THE DOOR ON MY SON,
7 LEAVING HIM OUTSIDE WITH HER. SHE JUST MAKES UP ALL
8 THIS STUFF AND WANTS PEOPLE TO BELIEVE IT, WHEN HE WAS
9 ACTUALLY GETTING IN THE CAR TO GO TO A WRESTLING CAMP.

10 Q HAVE YOU SEEN ANYTHING ON TIKTOK THAT WOULD
11 LEAD YOU TO BELIEVE THAT SHE WAS FOLLOWING YOUR FAMILY
12 OR FOLLOWING YOUR HUSBAND OR MAYBE ANYTHING LIKE THAT?

13 A I MEAN, SHE POSTS BEING AT MY HUSBAND'S WORK
14 ON NBC. SHE SAYS, "I'M HERE ON NBC'S LOT USING THEIR
15 WIFI." SO SHE LITERALLY TELLS US WHERE SHE IS ALL THE
16 TIME.

17 Q AND HOW DOES THAT MAKE YOU FEEL?

18 A UNSAFE.

19 THE COURT: JUST TO BE CLEAR, THE NBC LOT IS YOUR
20 HUSBAND'S WORKPLACE?

21 THE WITNESS: YES.

22 MS. KAZARIAN: NO FURTHER QUESTIONS.

23 THE COURT: ALL RIGHT.

24 CROSS-EXAMINATION?

25 MS. TOWNSEND: THANK YOU.

26

27 CROSS-EXAMINATION

28 BY MS. TOWNSEND:

1 Q MS. LOPEZ, SO YOU HAD MENTIONED THAT THE DAY
2 OF THE SERVICE -- CAN YOU DESCRIBE WHAT YOU WERE DOING
3 THAT DAY? WHERE WERE YOU IN RELATION TO WHERE THE
4 SERVICE WAS HAPPENING?

5 A I WAS NOT HOME.

6 Q YOU WERE NOT HOME. OKAY. SO YOU WEREN'T
7 ACTUALLY THERE THAT DAY?

8 A NO.

9 Q OKAY. OKAY. AND WHEN DID YOU RETURN HOME?

10 MS. KAZARIAN: OBJECTION. RELEVANCE.

11 THE COURT: WHAT IS THE RELEVANCE?

12 MS. TOWNSEND: I'M JUST TRYING TO ASCERTAIN IF
13 ANYONE CALLED HER AND EXPRESSED THAT THERE WAS A REASON
14 FOR HER TO IMMEDIATELY RETURN HOME.

15 THE COURT: SO YOU WEREN'T AT HOME. WHEN OR HOW
16 DID YOU BECOME AWARE OF THE SITUATION WITH THE PROCESS
17 SERVER?

18 THE WITNESS: MY HUSBAND CALLED ME IMMEDIATELY,
19 AND I IMMEDIATELY CAME HOME.

20 THE COURT: OKAY.

21 BY MS. TOWNSEND:

22 Q NOW, YOUR HUSBAND, YOU STATE THAT YOUR HUSBAND
23 IMMEDIATELY CALLED YOU. DID HE CALL THE POLICE, BY ANY
24 CHANCE?

25 A HE DID NOT.

26 Q AND DO YOU -- CAN YOU TELL ME WHY THE POLICE
27 WERE NOT CALLED?

28 MS. KAZARIAN: OBJECTION. FOUNDATION.

1 THE COURT: THAT'S SUSTAINED.

2 THAT'S A QUESTION FOR MR. LOPEZ.

3 THE WITNESS: ANSWER IT?

4 THE COURT: NO.

5 BY MS. TOWNSEND:

6 Q OKAY. SO DID MR. LOPEZ, BY ANY CHANCE, WHEN
7 HE CALLED YOU, DID HE STATE HE WAS IN FEAR, HE WAS
8 GOING TO CALL THE POLICE? DID HE STATE ANYTHING TO
9 THAT EFFECT? CAN YOU TELL ME WHAT HE SAID WHEN YOU
10 WERE -- WHEN HE CALLED TO NOTIFY YOU OF THE PROCESS
11 SERVING?

12 MS. KAZARIAN: OBJECTION. HEARSAY.

13 THE COURT: HEARSAY IS ADMISSIBLE IN CIVIL
14 HARASSMENT RESTRAINING ORDERS.

15 SO YOU CAN ANSWER.

16 MS. KAZARIAN: FORCE OF HABIT.

17 THE WITNESS: WELL, HE WAS LIVID THAT YOU
18 APPROACHED OUR 11-YEAR-OLD SON AND USED HIM TO GET HIM
19 OUTSIDE BECAUSE THE SAFETY OF OUR CHILD, THAT WAS
20 FIRST. AND SECOND THAT YOU FOUND WHERE WE LIVED, AND
21 YOU CAME TO SERVE HIM IN PERSON.

22 BY MS. TOWNSEND:

23 Q SO HE WASN'T FEARFUL. HE WAS LIVID, AS YOU
24 STATE. OKAY.

25 MS. KAZARIAN: OBJECTION.

26 THE COURT: IT'S NOT A QUESTION.

27 MS. TOWNSEND: UNDERSTOOD. UNDERSTOOD. MY
28 APOLOGIES.

1 BY MS. TOWNSEND:

2 Q OKAY. SO YOU STATE THAT HE WAS LIVID, AND HE
3 WASN'T SURE HOW THE ADDRESS TO YOUR HOME WAS DISCLOSED.
4 CAN YOU GIVE ME INFORMATION, OR CAN YOU TELL ME ABOUT
5 THE LAWSUIT THAT YOU AND MR. LOPEZ FILED IN 2023?

6 MS. KAZARIAN: OBJECTION. RELEVANCE.

7 THE COURT: I THINK I KNOW WHAT THE RELEVANCE IS
8 FROM HER RESPONSE. SO I'M GOING TO ALLOW THIS.

9 THE WITNESS: ANSWER IT?

10 THE COURT: YES.

11 THE WITNESS: WELL, YOU POSTED ON TIKTOK EXACTLY
12 HOW YOU GOT OUR ADDRESS.

13 BY MS. TOWNSEND:

14 Q CAN YOU TELL ME WHAT THE LAWSUIT WAS REGARDING
15 IN 2023?

16 A YES. THE BUILDER OF OUR HOME.

17 Q OKAY. AND THEN BASED ON THIS LAWSUIT, CAN YOU
18 TELL ME HOW MUCH PRESS COVERAGE WENT -- JUST BASED OFF
19 WHAT YOU CAN RECALL BACK IN 2023, HOW MUCH PRESS
20 COVERAGE THERE WAS IN REGARDS TO THIS LAWSUIT, AND I
21 BELIEVE IT'S AGAINST THE BUILDER OF YOUR HOME; IS THAT
22 CORRECT?

23 A YES.

24 Q OKAY. CAN YOU JUST -- ROUGHLY, HOW MANY
25 ARTICLES, HOW MANY NEWS ARTICLES COVERED THE LAWSUIT?

26 MS. KAZARIAN: OBJECTION. FOUNDATION.

27 THE COURT: WELL, IF YOU KNOW?

28 THE WITNESS: NONE TO MY KNOWLEDGE.

1 BY MS. TOWNSEND:

2 Q OKAY. SO IF YOU WERE TO GOOGLE-SEARCH THE
3 LAWSUIT BETWEEN YOU AND YOUR HUSBAND AND THE HOME
4 BUILDER, DO YOU THINK YOU WOULD FIND ANYTHING, ANY NEWS
5 ARTICLES THAT DISCUSSED THE LAWSUIT AGAINST YOUR -- THE
6 BUILDER OF YOUR HOME?

7 MS. KAZARIAN: OBJECTION. SPECULATION.

8 THE COURT: SUSTAINED.

9 DON'T ANSWER.

10 MS. TOWNSEND: FAIR ENOUGH. LET ME REPHRASE
11 THAT.

12 BY MS. TOWNSEND:

13 Q DO YOU BELIEVE THERE WAS ANY PRESS COVERAGE
14 REGARDING THE LAWSUIT IN 2023 WITH YOU AND YOUR HUSBAND
15 AND THE HOME BUILDER?

16 A I ALREADY SAID THAT. NO.

17 Q NO. YOU DON'T BELIEVE THERE WAS ANY PRESS
18 COVERAGE?

19 A NO.

20 Q OKAY.

21 A WE FILED JUST LIKE A NORMAL FAMILY WOULD.

22 Q OKAY. AND YOU HAD MENTIONED THAT I HAD
23 IDENTIFIED INFORMATION THAT DISCLOSED YOUR HOME. ARE
24 YOU, BY ANY CHANCE, AWARE OF THE TIKTOK AND INSTAGRAM
25 POSTS THAT YOUR HUSBAND HAS MADE THAT DOCUMENTS THE
26 OUTSIDE OF YOUR HOME?

27 MS. KAZARIAN: OBJECTION. VAGUE AS TO WHICH
28 TIKTOK.

1 MS. TOWNSEND: OKAY.

2 THE COURT: IT'S COMPOUND. WHY DON'T YOU BE MORE
3 SPECIFIC ABOUT THE INDIVIDUAL ONES.

4 MS. TOWNSEND: SURE.

5 BY MS. TOWNSEND:

6 Q SO IT IS A TIKTOK. LET ME GO THROUGH, IF YOU
7 DON'T MIND. THERE ARE THREE POSTS IN WHICH IT DEPICTS
8 THE OUTSIDE OF YOUR HOME. SO ON OR ABOUT JANUARY 15TH
9 OF THIS YEAR, THERE WAS AN INSTAGRAM REEL, 10.5 MILLION
10 VIEWERS, IN WHICH YOUR HUSBAND PROMOTES HIS SHOE LINE
11 AND DISCUSSES TEQUILA DURING THE L.A. FIRES. DO YOU
12 RECALL THAT POST?

13 A YES.

14 Q YOU DO. OKAY. NOW, HOW DID YOU FEEL WHEN
15 YOUR HUSBAND MADE THIS POST WHICH REVEALED THE OUTSIDE
16 OF YOUR HOME?

17 A I BELIEVE HE WAS WALKING DOWN THE STREET SO IT
18 WASN'T EXACTLY IN FRONT OF THE HOUSE. IT WAS JUST ON
19 THE STREET.

20 Q OKAY. LET'S GO THROUGH THE NEXT POST. ON OR
21 ABOUT JANUARY 11TH OF 2025, A TOTAL OF 1.1 MILLION
22 VIEWERS, DEPICTS THE ENTIRE FRONT OF YOUR HOME AND A
23 FALLEN TREE. NOW, HOW DID THAT MAKE YOU FEEL, THE
24 DISCLOSURE OF THE FRONT OF YOUR HOME AND THE FALLEN
25 TREE?

26 A I DON'T KNOW WHAT YOU'RE TALKING ABOUT.

27 Q IN YOUR HUSBAND'S INSTAGRAM --

28 THE COURT: SO THIS IS ASSUMING FACTS NOT IN

1 EVIDENCE. DO YOU WANT TO PRESENT SOME SORT OF EXHIBIT?

2 MS. TOWNSEND: IT'S ON PAGE 5 OF THE OPPOSITION.
3 SO I HAD INCLUDED THE INSTAGRAM AND THE TIKTOK REEL
4 SPECIFICALLY.

5 THE WITNESS: I BELIEVE WHAT SHE'S REFERRING TO
6 WAS DURING THE FIRES OR -- IT WAS THE NEIGHBOR'S TREE.
7 IT WASN'T OUR TREE. SHE'S JUST ASSUMING THAT IT'S OUR
8 TREE.

9 BY MS. TOWNSEND:

10 Q FAIR ENOUGH. YES. IT COULD HAVE BEEN A
11 NEIGHBOR'S. BUT IT DID DEPICT THE ENTIRE FRONT OF YOUR
12 HOME?

13 A WE'VE NEVER HAD A TREE FALL ON OUR HOME.

14 MS. KAZARIAN: OBJECTION. FACTS NOT IN EVIDENCE.

15 THE COURT: SUSTAINED.

16 MS. TOWNSEND: OKAY.

17 THE COURT: SO, MS. TOWNSEND, IF YOU HAVE THE
18 ACTUAL POSTS, THEN --

19 MS. TOWNSEND: I INCLUDED THEM AS LINKS WITHIN
20 THE OPPOSITION.

21 THE COURT: RIGHT. BUT NOW YOU'RE PRESENTING
22 YOUR EVIDENCE IN COURT --

23 MS. TOWNSEND: RIGHT.

24 THE COURT: -- AND YOU'RE TRYING TO CONFRONT A
25 WITNESS WITH IT, AND YOU'RE CONFRONTING HER WITH
26 NOTHING PHYSICALLY YOU SEE.

27 MS. TOWNSEND: IS IT POSSIBLE WE CAN CLICK ON THE
28 LINK AND SHOW HER THE VIDEO FROM THE OPPOSITION?

1 THE COURT: IS THERE ANY REASON YOU CAN'T FIND IT
2 ON YOUR PHONE?

3 MS. TOWNSEND: I'M SURE I CAN. I CAN SHOW HER
4 FROM MY PHONE, IF I HAVE THE COURT'S PERMISSION TO DO
5 SO?

6 THE COURT: OKAY.

7 MS. TOWNSEND: AND THERE'S A MICROPHONE THERE?

8 THE COURT: THE MICROPHONE'S ACTUALLY IN FRONT OF
9 YOU.

10 MS. TOWNSEND: SO DO I HAVE TO --

11 THE COURT: YOU CAN MOVE IT.

12 MS. TOWNSEND: I GUESS THE CONTENT OF THE
13 VIDEO --

14 THE COURT: I THINK THE VISUAL ASPECT --

15 MS. TOWNSEND: THE VISUAL ASPECT IS MORE -- YES.
16 LET ME -- MY APOLOGIES. LET ME TRY TO LOCATE THE POST
17 ITSELF.

18 THE COURT: WE CAN CALL THIS "RESPONDENT'S A" BY
19 REFERENCE.

20 MS. TOWNSEND: MY APOLOGIES. IT LOOKS LIKE
21 THEY'RE BY WEEK. SO I'M TRYING TO FIND THE DATE. I'M
22 GETTING CLOSE HERE.

23 THE COURT: THIS IS THE JANUARY 15TH ONE?

24 MS. TOWNSEND: YES.

25 THE COURT: OKAY. WELL, LET'S MOVE THIS ALONG.

26 MS. TOWNSEND: SPECIFICALLY THE JANUARY 15TH AND
27 THE JANUARY 11TH. THE 11TH SHOWS MORE --

28 THE COURT: SO IF YOU LOOK UP.

1 MS. TOWNSEND: OH, YES. THAT'S IT.

2 BY MS. TOWNSEND:

3 Q YOU CAN SEE THAT, RIGHT, MS. LOPEZ?

4 A YES.

5 Q OKAY.

6 MS. TOWNSEND: SO IF WE COULD PLAY THAT, PLEASE,
7 YOUR HONOR. THANK YOU.

8 THE WITNESS: THIS IS THE ONE I SAID HE WAS ON
9 THE STREET.

10 THE COURT: LET ME KNOW IF THERE'S A POINT TO
11 PAUSE IT THAT YOU WANTED TO SPECIFICALLY DRAW ATTENTION
12 TO.

13 MS. TOWNSEND: YES. IT SHOULD BE COMING UP SOON.

14
15 (INAUDIBLE.)

16
17 OKAY. CAN YOU PAUSE IT RIGHT HERE.

18 BY MS. TOWNSEND:

19 Q OKAY. NOW, DO YOU SEE BEHIND YOUR HUSBAND ON
20 KIND OF ON THE RIGHT-HAND SIDE, IT LOOKS LIKE THAT'S, I
21 BELIEVE -- IS THAT THE FRONT OF YOUR HOME, DIRECTLY
22 BEHIND HIM?

23 A THAT'S TOWARDS OUR NEIGHBOR'S.

24 Q TOWARDS YOUR NEIGHBOR'S. OKAY. SO WHAT SIDE
25 IS YOUR HOME IN RELATION TO WHERE YOUR HUSBAND'S AT?

26 MS. KAZARIAN: OBJECTION. RELEVANCE.

27 THE COURT: IT SEEMS RELEVANT IF SHE'S CLAIMING
28 THAT HIS ADDRESS WAS PUBLICIZED IN SOME FORM OTHER THAN

1 HER SOCIAL MEDIA POST. I THINK I ACTUALLY DO NEED TO
2 SEE THE COMPARISON BETWEEN WHAT SHE'S PUBLISHED AND
3 WHAT SHE'S CLAIMING HE'S PUBLISHED.

4 THE WITNESS: SO WHAT ARE YOU ASKING ME?
5 BY MS. TOWNSEND:

6 Q SO WHERE IS YOUR HOME IN RELATION TO WHERE
7 YOUR HUSBAND IS IN THIS VIDEO?

8 A IT IS BACK, TOWARDS THE RIGHT.

9 Q SO KIND OF WHERE THAT -- I BELIEVE THAT'S A
10 GREEN PORTA POTTY; IS THAT CORRECT? IS THAT --

11 A YES.

12 Q -- WHERE YOU'RE IDENTIFYING?

13 A YES.

14 Q OKAY. SO THAT'S WHERE YOUR HOME IS?

15 A YES.

16 Q OKAY. EXCELLENT.

17 MS. TOWNSEND: YOUR HONOR, IS IT POSSIBLE FOR YOU
18 TO GO TO THE JANUARY 11TH POST? IT SHOULD BE JUST A
19 COUPLE DAYS PRIOR TO THAT ONE.

20 THE COURT: WAS THERE A LINK TO THAT AS WELL?

21 MS. TOWNSEND: YES. IT'S IN THE OPPOSITION; PAGE
22 5, PARAGRAPH 2.

23 THE COURT: OKAY.

24

25 (INAUDIBLE.)

26

27 BY MS. TOWNSEND:

28 Q NOW, MS. LOPEZ, DO YOU SEE THAT GREEN PORTA

1 POTTY AGAIN? IS THAT NEAR YOUR PROPERTY OR?

2 A THAT'S THE NEIGHBOR.

3 Q THAT'S THE NEIGHBOR. OKAY.

4 JUST CONTINUE THROUGH HERE.

5

6 (INAUDIBLE.)

7

8 MS. TOWNSEND: YOUR HONOR, IF YOU COULD PAUSE
9 RIGHT THERE, PLEASE. I DON'T KNOW IF YOU CAN GO BACK A
10 LITTLE.

11 BY MS. TOWNSEND:

12 Q MS. LOPEZ, CAN YOU TELL ME, IS THIS THE FRONT
13 OF YOUR HOME?

14 A YES. HE'S ON THE STREET.

15 Q OKAY. SO YOUR HUSBAND POSTED THE ENTIRE FRONT
16 OF YOUR HOME IN THIS POST; CORRECT?

17 A CORRECT, BUT HE'S NOT SAYING THAT THAT IS OUR
18 HOME.

19 Q WELL THE PREVIOUS POST ALLUDED TO HIM SAYING
20 IT WAS "CASA LOPEZ."

21 MS. KAZARIAN: OBJECTION. ASSUMES FACTS NOT IN
22 EVIDENCE.

23 THE COURT: I MEAN, THIS POST ACTUALLY SAYS "CASA
24 LOPEZ."

25 BY MS. TOWNSEND:

26 Q SO DID YOUR HUSBAND NOT POST -- DID YOUR
27 HUSBAND POST THE FRONT OF YOUR HOME WITH THE HASHTAG
28 "CASA LOPEZ"?

1 A YES.

2 Q HE DID. OKAY. AND HOW DID THAT MAKE YOU
3 FEEL?

4 A NOTHING.

5 Q YOU WERE NOT WORRIED FOR YOUR SAFETY?

6 A I DON'T LIKE WHEN HE DOES THAT, NO.

7 Q OKAY. SO WHEN HE POSTED IT ON JANUARY 11TH
8 AND THEN AGAIN ON JANUARY 15TH, DID YOU EVER HAVE A
9 CONVERSATION WITH HIM ABOUT HOW YOU DID NOT APPROVE OF
10 THAT?

11 A NO.

12 Q OKAY. WHY WAS THAT?

13 A BECAUSE WE WERE DEALING WITH OTHER STUFF,
14 HELPING WITH THE FIRES. SO I HAD OTHER PRIORITIES.

15 Q SO YOUR PRIORITY WAS NOT YOUR SAFETY, BUT IT
16 WAS DEALING WITH THE FIRES?

17 THE COURT: THAT'S ARGUMENTATIVE.

18 MS. TOWNSEND: FAIR ENOUGH. MY APOLOGIES, YOUR
19 HONOR.

20 BY MS. TOWNSEND:

21 Q SO A PRIORITY WAS NOT TO PREVENT THE PUBLIC
22 DISCLOSURE TO 11.6 MILLION VIEWERS OF THE FRONT OF YOUR
23 HOME; CORRECT?

24 A SAY THAT AGAIN.

25 Q SO YOUR PRIORITY AT THE TIME WAS NOT TO
26 PREVENT THE PUBLIC DISCLOSURE TO 11.6 MILLION VIEWERS
27 OF THE FRONT OF YOUR HOME?

28 MS. KAZARIAN: ALSO ARGUMENTATIVE, YOUR HONOR.

1 OBJECTION.

2 BY MS. TOWNSEND:

3 Q YOUR PRIORITY AT THE TIME WAS NOT TO PREVENT
4 THAT DISCLOSURE. SO YOUR DISCUSSION WITH YOUR
5 HUSBAND -- DID YOU EVER HAVE A DISCUSSION WITH YOUR
6 HUSBAND ABOUT TAKING THESE POSTS DOWN?

7 MS. KAZARIAN: OBJECTION. ASKED AND ANSWERED.

8 THE COURT: I DON'T THINK THAT QUESTION WAS.

9 THE WITNESS: I THOUGHT I ANSWERED THAT.

10 NO.

11 BY MS. TOWNSEND:

12 Q SO YOU NEVER HAD A DISCUSSION WITH YOUR
13 HUSBAND EITHER DURING THAT TIME OR AFTERWARDS FOR YOUR
14 FEAR OF SAFETY OF THE PUBLIC KNOWLEDGE OF YOUR HOME TO
15 HAVE HIM REMOVE THOSE POSTS?

16 THE COURT: AT THIS POINT I THINK IT IS ASKED AND
17 ANSWERED.

18 MS. TOWNSEND: SORRY.

19 THE COURT: SHE'S SAYING THAT SHE HAS NOT ASKED
20 HIM TO REMOVE THE POSTS.

21 AT ANY POINT; CORRECT?

22 THE WITNESS: CORRECT.

23 BY MS. TOWNSEND:

24 Q SO GIVEN THAT YOU'RE FEARFUL -- ALLEGEDLY
25 YOU'RE FEARFUL THAT MY SERVICE, PROCESS SERVING VIDEO
26 WOULD LEAD TO INDIVIDUALS KNOWING AND COMING TO YOUR
27 HOME. WAS THERE EVER A DISCUSSION ABOUT REMOVING THESE
28 TWO POSTS FROM YOUR HUSBAND'S SOCIAL MEDIA?

1 MS. KAZARIAN: OBJECTION. ASKED AND ANSWERED.

2 THE COURT: IT IS. SO SUSTAINED.

3 YOU DON'T HAVE TO ANSWER THAT.

4 MS. TOWNSEND: LET ME REPHRASE THAT.

5 THE COURT: WELL, DON'T REPHRASE IT. IT'S THE
6 SAME QUESTION.

7 MS. TOWNSEND: FAIR ENOUGH.

8 BY MS. TOWNSEND:

9 Q SO CAN YOU TELL ME OR -- OBVIOUSLY, THESE ARE
10 STILL UP TO THIS DAY. HOW DO THESE POSTS MAKE YOU FEEL
11 THAT -- TO HAVE THESE TWO INSTAGRAM POSTS STILL UP ON
12 YOUR HUSBAND'S --

13 MS. KAZARIAN: OBJECTION. ASKED AND ANSWERED.

14 THE COURT: SO IS THERE ANYTHING OTHER THAN THE
15 FACT THAT YOU MENTIONED THAT YOU DON'T LIKE IT THAT YOU
16 WOULD ADD ABOUT THAT?

17 THE WITNESS: NO, BUT HE KNOWS.

18 BY MS. TOWNSEND:

19 Q OKAY. HE KNOWS, BUT HE'S STILL KEEPING THESE
20 UP; IS THAT CORRECT? CAN YOU ANSWER THAT?

21 THE COURT: THAT'S NOT RELEVANT.

22 MS. TOWNSEND: FAIR ENOUGH. OKAY. LET ME GO ON
23 TO A NEW LINE OF QUESTIONING THEN.

24 BY MS. TOWNSEND:

25 Q SO YOU MENTIONED THAT -- CAN YOU WALK ME
26 THROUGH WHAT YOU DISCUSSED WITH YOUR SON THE DAY OF THE
27 PROCESS SERVING?

28 MS. KAZARIAN: OBJECTION. ASKED AND ANSWERED.

1
2 (THE COURT HAD A DISCUSSION OFF THE
3 RECORD WITH JUDICIAL ASSISTANT.)
4

5 THE JUDICIAL ASSISTANT: MA'AM, PLEASE STAND UP.
6 RAISE YOUR RIGHT HAND. DO YOU SOLEMNLY STATE UNDER
7 PENALTY OF PERJURY THAT THE TESTIMONY YOU MAY GIVE IN
8 THE CAUSE NOW PENDING BEFORE THIS COURT SHALL BE THE
9 TRUTH, THE WHOLE TRUTH, AND NOTHING BUT THE TRUTH?

10 THE RESPONDENT: YES.

11 THE JUDICIAL ASSISTANT: THANK YOU.

12 THE COURT: SO I DO THINK SHE'S ALREADY ADDRESSED
13 THE DISCUSSION THAT SHE HAD WITH HER SON AFTERWARDS,
14 THAT HE THOUGHT HE WAS IN TROUBLE, THAT HE WAS WORRIED
15 ABOUT THAT. SO IF YOU HAVE MORE SPECIFIC QUESTIONS
16 ABOUT THAT INTERACTION --

17 MS. TOWNSEND: YES, I DO. LET ME BE MORE
18 SPECIFIC IN HOW I FRAME THIS.

19 BY MS. TOWNSEND:

20 Q SO YOUR SON THOUGHT THAT HE WAS IN TROUBLE.
21 IN TROUBLE WITH WHOM?

22 A US.

23 Q AND WHY WOULD HE BELIEVE HE WOULD BE IN
24 TROUBLE FOR THIS?

25 A BECAUSE HE WAS CONFIRMING YOUR QUESTIONS, AND
26 YOU'RE A STRANGER.

27 Q SO DID YOUR SON EVER STATE TO YOU WHAT
28 ACTUALLY HAPPENED IN THE ENCOUNTER, THAT THERE WAS AN

1 ADULT THERE AND PRESENT? CAN YOU TELL ME WHO THE ADULT
2 WAS?

3 A HIS WRESTLING COACH.

4 Q HIS WRESTLING COACH. OKAY. AND DID THE
5 WRESTLING COACH AT ANY POINT DETAIL THE INTERACTION TO
6 YOU IN WHAT THE CONVERSATION WAS BETWEEN THE WRESTLING
7 COACH AND I?

8 A NO.

9 Q SO HOW DID YOU KNOW WHAT THAT INTERACTION WAS
10 DETAILING? HOW DID YOU KNOW THE DETAILS OF THE
11 CONVERSATION?

12 A MY SON.

13 Q OKAY. SO YOUR SON HAD OVERHEARD THE ENTIRE
14 CONVERSATION OR?

15 A MY SON TOLD ME WHAT YOU ASKED HIM.

16 Q OKAY. I DON'T KNOW HOW I CAN ANSWER THIS.

17 THE COURT: YOU'RE NOT ANSWERING ANYTHING.

18 MS. TOWNSEND: NO. NOT ANSWER THIS.

19 THIS LINE OF QUESTIONING. IT'S VERY
20 DIFFERENT WHEN YOU ARE THE PLAINTIFF -- OR THE
21 RESPONDENT, I SHOULD SAY.

22 SO LET ME REPHRASE THIS.

23 THE COURT: IT SOUNDS LIKE YOU'RE TRYING TO GET
24 AT A CONVERSATION THAT SHE DOESN'T HAVE ANY FOUNDATION
25 OR KNOWLEDGE FOR.

26 MS. TOWNSEND: CORRECT. CORRECT.

27 THE COURT: SO NOT THE RIGHT WITNESS.

28 MS. TOWNSEND: FAIR ENOUGH. LET'S MOVE ON.

1 BY MS. TOWNSEND:

2 Q SO YOU STATED THAT -- OR YOU WERE ASKED ABOUT
3 BY YOUR COUNSEL YOUR SUMMER VACATION. SO CAN YOU --
4 DID YOU END UP GOING ON SUMMER VACATION?

5 A YES.

6 Q OKAY. AND WHEN WAS THAT?

7 MS. KAZARIAN: OBJECTION. RELEVANCE.

8 THE COURT: WHAT'S THE RELEVANCE?

9 MS. TOWNSEND: SO THE RELEVANCE IS IF THIS
10 IMPACTED THE SUMMER VACATION, IF THEY WERE -- IF THERE
11 WAS CREDIBLE FEAR AND THREAT AND IT IMPACTED THE
12 SUMMER, THE SUMMER VACATION AS THE COUNSEL WAS CLEARLY
13 ALLUDING TO --

14 THE COURT: OKAY. SO --

15 MS. KAZARIAN: I WITHDRAW MY OBJECTION.

16 THE COURT: ALL RIGHT.

17 SO YOU MENTIONED A COUPLE OF THINGS. YOU
18 SAID THAT YOUR CHILDREN WERE ACCOMPANIED BY A RETIRED
19 POLICE OFFICER WHEN THEY WENT TO AN AMUSEMENT PARK.
20 ARE THERE OTHER WAYS IN WHICH THE SUMMER VACATION WAS
21 IMPACTED BY THE RESPONDENT'S ACTIONS?

22 THE WITNESS: YES. MY KIDS DON'T WANT TO PLAY
23 OUTSIDE. THEY DON'T WANT TO BE NORMAL KIDS AND JUST DO
24 THINGS OUTSIDE BECAUSE THEY'RE AFRAID OF WHO CAN COME
25 UP TO THE PROPERTY.

26 BY MS. TOWNSEND:

27 Q I THINK WHAT I WAS ALLUDING TO IS THAT YOU
28 TOOK A SUMMER VACATION --

1 A YOU'RE ACTUALLY -- ON AN AIRPLANE. ON AN
2 AIRPLANE? LIKE, WE WENT SOMEWHERE?

3 Q I SEE.

4 A IS THAT YOU'RE ASKING?

5 Q WELL, YOUR COUNSEL MADE IT SOUND LIKE YOU HAD
6 TO CANCEL YOUR VACATION PLANS BECAUSE OF THE PROCESS
7 SERVING EVENT; IS THAT CORRECT?

8 A NO.

9 Q NO. OKAY. SO YOU WENT ON YOUR VACATION --

10 A YES.

11 Q -- AND THAT HAPPENED. CAN YOU TELL ME HOW
12 MUCH LONGER OR HOW MUCH AFTER THE PROCESS SERVING EVENT
13 THAT YOU ACTUALLY WENT ON THE VACATION?

14 MS. KAZARIAN: OBJECTION. RELEVANCE.

15 THE COURT: WAS THE ACTUAL TRAVEL VACATION? WAS
16 THAT IMPACTED BY THE PROCESS SERVING EVENT?

17 THE WITNESS: NO.

18 BY MS. TOWNSEND:

19 Q OKAY. FAIR ENOUGH. SO LET'S SEE HERE. YOU
20 HAD STATED THAT THE VIDEO POSTED IN REGARD TO THE
21 BEHIND-THE-SCENES OF THE PROCESS SERVING, YOU BELIEVED
22 THAT I HAD MADE CRAZY, QUOTE ON QUOTE, YOU SAID, "CRAZY
23 THINGS" UP, THAT YOU BELIEVED IT DID NOT DEPICT YOUR
24 HUSBAND SLAMMING THE GATE ON THE PROCESS SERVER?

25 A CORRECT.

26 Q SO HOW DID YOU -- HAVE YOU VIEWED THE VIDEO?
27 CLEARLY YOU HAVE --

28 A YES.

1 Q -- BECAUSE YOU'VE SEEN THE VIDEO, BEHIND THE
2 SCENES OF HOW THE PROCESS SERVING OCCURRED. SO DO YOU
3 KNOW -- DID YOU SPEAK WITH YOUR HUSBAND, DO YOU KNOW
4 WHY HE SLAMMED THE GATE AND LEFT YOUR SON OUT IN THE
5 STREET WITH MYSELF AND THE PROCESS SERVER?

6 MS. KAZARIAN: OBJECTION. COMPOUND. FOUNDATION.

7 THE COURT: AND ASSUMES FACTS NOT IN EVIDENCE.

8 MS. KAZARIAN: YES.

9 THE COURT: SUSTAINED ON ALL THREE GROUNDS.

10 MS. TOWNSEND: LET ME -- I BELIEVE I HAVE THIS
11 VIDEO PART OF THE OPPOSITION.

12 I HAVE A PART OF THE ANTI-SLAPP, BUT WE'VE
13 ALREADY HEARD THAT. SO I'LL MOVE ON.

14 THE COURT: IS IT A LINK WITHIN THE --

15 MS. TOWNSEND: YEAH, IT'S A LINK WITHIN THE
16 ANTI-SLAPP. LET ME GET YOU THE PAGE NUMBER WITHIN
17 THAT.

18 THE COURT: I THINK THAT I HAVE IT. PAGE 13 TO
19 36?

20 MS. TOWNSEND: YES, THAT WOULD BE IT. THE RADAR
21 ONLINE POST.

22 COULD WE SHOW THAT TO THE WITNESS, PLEASE.
23 THANK YOU SO MUCH, YOUR HONOR.

24 THE COURT: JUST KEEP THINGS MOVING.

25

26 (INAUDIBLE.)

27

28 BY MS. TOWNSEND:

1 Q SO, MS. LOPEZ, CAN YOU -- WHEN YOU WATCHED
2 THIS VIDEO, DO YOU STILL BELIEVE -- OR I'M SORRY. LET
3 ME REPHRASE THIS.

4 WHEN YOU WATCHED THIS VIDEO, WERE YOU -- HAD
5 YOU ASKED YOUR HUSBAND WHY HE DID NOT PULL YOUR SON
6 INTO THE COURTYARD WITH HIM?

7 A MY SON AND HIS WRESTLING COACH WERE LOADING
8 THE CAR THAT WAS ON THE STREET TO GO TO A WRESTLING
9 CAMP.

10 Q MAY I ASK WHY THE WRESTLING COACH AND YOUR
11 HUSBAND WENT INSIDE THE COURTYARD TOGETHER AND LEFT
12 YOUR SON OUT?

13 MS. KAZARIAN: OBJECTION. FOUNDATION.
14 RELEVANCE.

15 THE COURT: SUSTAINED ON BOTH GROUNDS.

16 YOU'RE ASKING HER TO EXPLAIN THE ACTIONS
17 OF OTHER PEOPLE.

18 MS. TOWNSEND: I UNDERSTAND.

19 THE COURT: OKAY.

20 MS. TOWNSEND: YES. I'M SORRY.

21 BY MS. TOWNSEND:

22 Q SO LET ME REPHRASE THIS. WHEN YOU SPOKE WITH
23 YOUR HUSBAND AND THE WRESTLING COACH AFTER THE FACT --

24 MS. KAZARIAN: OBJECTION. ASSUMES FACTS NOT IN
25 EVIDENCE. SPEAKING TO THE WRESTLING COACH.

26 THE COURT: THAT'S TRUE. SUSTAINED.

27 BY MS. TOWNSEND:

28 Q SO WHEN YOU WATCHED THIS VIDEO, YOU ARE

1 FEARFUL FOR YOUR HUSBAND'S SAFETY AFTER WATCHING THIS
2 VIDEO?

3 A MY WHOLE FAMILY.

4 Q SPECIFICALLY YOUR HUSBAND.

5 A YES.

6 Q SO YOU'RE FEARFUL FOR YOUR HUSBAND'S SAFETY
7 AFTER WATCHING THIS VIDEO?

8 MS. KAZARIAN: OBJECTION. ASKED AND ANSWERED.

9 THE COURT: IT IS.

10 MS. TOWNSEND: OKAY. I THINK THAT'S ALL I HAVE
11 FOR THE WITNESS, YOUR HONOR.

12 THE COURT: ALL RIGHT.

13 REDIRECT?

14 MS. KAZARIAN: YES. THANK YOU.

15 THE COURT: OKAY.

16

17 REDIRECT EXAMINATION

18 BY MS. KAZARIAN:

19 Q BEFORE THIS VIDEO WAS POSTED ONLINE, DID YOU
20 EVER HAVE ANY FEAR OF PEOPLE ON THE INTERNET USING
21 GOOGLE LENS OR GOOGLE TO TRY TO LOCATE YOUR HOUSE ON
22 ANY VIDEOS THAT WERE POSTED TO THE INTERNET?

23 A I MEAN, THAT'S ALWAYS SOMETHING I WORRY ABOUT,
24 BUT NO. I DIDN'T REALLY THINK ABOUT IT. AND REGARDING
25 THE VIDEOS THAT MARIO HAD POSTED, IT WAS -- OUR HOUSE
26 WAS IN THE BACKGROUND, BUT BECAUSE IT WASN'T
27 SPECIFICALLY, LIKE, "THIS IS OUR HOUSE," I DIDN'T, YOU
28 KNOW -- YOU CAN'T REALLY -- YOU DON'T KNOW IF IT'S OUR

1 HOUSE. HE'S JUST WALKING ON THE STREET, AND HE'S
2 TURNING AROUND, AND SO THAT'S WHY I DIDN'T MAKE MUCH OF
3 IT.

4 Q SINCE YOU'VE BEEN INTRODUCED TO MS. TOWNSEND,
5 HAVE YOU SEEN VIDEOS WHERE MS. TOWNSEND IS ASKING
6 PEOPLE TO ANALYZE VIDEOS THAT YOUR HUSBAND HAS POSTED
7 TO DETERMINE HIS LOCATION?

8 A YES.

9 Q WHAT VIDEO WAS THAT?

10 A IT WAS A PICTURE OF US AT CHURCH.

11 Q AND WHAT CONVERSATIONS DID YOU SEE ONLINE THAT
12 WERE INSTIGATED BY MS. TOWNSEND, ABOUT THAT PICTURE?

13 A THEY WANTED TO USE, I DON'T KNOW, CHAT,
14 GOOGLE, OR --

15 Q WHEN YOU SAY "THEY," WHO IS THEY?

16 A I DON'T KNOW. THIS PERSON SHE'S SPEAKING TO.
17 I DON'T KNOW. SOMEBODY THAT SHE WAS BEFRIENDED TO FIND
18 OUT STUFF.

19 Q IS THIS A CONVERSATION IN THE COMMENTS THAT
20 YOU WERE WATCHING BETWEEN MS. TOWNSEND AND SOMEONE
21 ELSE?

22 A I HAD SEEN THAT THIS PERSON HAD WRITTEN HER
23 UNDER THE COMMENTS AND THIS WAS SOMETHING THAT WAS SENT
24 TO US AFTER THE FACT.

25 Q OKAY. SO WHAT DID YOU SEE THE CONVERSATION,
26 WHAT DID THE CONVERSATION SAY?

27 A THIS PERSON APPROACHED HER UNDER THE COMMENTS
28 AND SAID, "I WORK FOR UNIVERSAL, AND I CAN HELP YOU

1 SERVE HIM." THAT'S WHEN SHE WAS LOOKING FOR THE
2 SERVERS.

3 Q AND DID MS. TOWNSEND ENGAGE IN CONVERSATION
4 WITH THAT PERSON?

5 A YES.

6 Q AND WAS THE CONVERSATION ABOUT USING GOOGLE TO
7 FIND LANDMARKS TO DETERMINE WHERE YOU, YOUR HUSBAND,
8 AND YOUR FAMILY WERE IN THAT PICTURE?

9 A YES.

10 Q AND WHERE WERE YOU?

11 A AT CHURCH.

12 Q AND DID THEY DETERMINE THE ADDRESS OF THE
13 CHURCH BASED ON THAT PICTURE?

14 A YES.

15 Q AND DID THAT -- HOW DID THAT MAKE YOU FEEL?

16 A UNSAFE.

17 Q AND WAS -- WERE YOU FEELING UNSAFE BECAUSE OF
18 MS. TOWNSEND?

19 A YES.

20 Q AND AS YOU SIT HERE NOW, BECAUSE OF THAT
21 CONVERSATION THAT YOU SAW, DOES THAT VIDEO THAT
22 MS. TOWNSEND POSTED OF BEING AT YOUR HOUSE, DOES THAT
23 GIVE YOU ALARM?

24 A YES.

25 Q AND DOES THAT GIVE YOU A DIFFERENT KIND OF
26 FEAR THAN THE VIDEOS THAT YOUR HUSBAND HAS POSTED?

27 A ABSOLUTELY. YES.

28 Q HAS YOUR HUSBAND EVER INTERACTED WITH

1 COMMENTERS ON HIS OWN POSTS, GIVING PEOPLE MORE
2 INFORMATION ABOUT THE ACTUAL LOCATION OF YOUR HOME?

3 A NO.

4 Q ARE YOU AFRAID OF MS. TOWNSEND?

5 A YES.

6 Q ARE YOU AFRAID ON BEHALF OF YOUR HUSBAND OF
7 MS. TOWNSEND?

8 A YES.

9 Q ARE YOU AFRAID ON BEHALF OF YOUR CHILDREN OF
10 MS. TOWNSEND?

11 A YES.

12 Q DO HER POSTS ONLINE MAKE YOU FEEL ANY
13 PARTICULAR WAY?

14 A YES. I THINK SHE'S A TICKING TIME BOMB AND
15 VERY UNHINGED.

16 MS. TOWNSEND: OBJECTION, YOUR HONOR. THAT'S
17 LAYPERSON TESTIMONY. "UNHINGED"?

18 MS. KAZARIAN: THAT IS LAYPERSON TESTIMONY.

19 THE COURT: YES. SHE'S A LAYPERSON.

20 MS. TOWNSEND: IT'S NOT ADMISSIBLE.

21 THE COURT: SHE CAN SAY HER OPINION THAT SHE
22 THINKS YOU'RE UNHINGED.

23 MS. TOWNSEND: THAT'S FAIR.

24 BY MS. KAZARIAN:

25 Q DO YOU HAVE EXPERIENCE WITH PEOPLE WHO HAVE
26 DIAGNOSED MENTAL HEALTH DISORDERS?

27 A NO.

28 MS. KAZARIAN: NO FURTHER QUESTIONS.

1 THE COURT: ALL RIGHT.

2 RECROSS?

3 MS. TOWNSEND: YES, PLEASE.

4 THE COURT: ONLY BASED ON WHAT SHE ASKED, THOUGH.

5 MS. TOWNSEND: YES. BASED ON WHAT WAS ASKED.

6

7 RECROSS EXAMINATION

8 BY MS. TOWNSEND:

9 Q SO YOU JUST -- YOU TESTIFIED THAT YOU WERE
10 MADE AWARE BY AN INDIVIDUAL THAT I HAD APPARENTLY BEEN
11 SPEAKING WITH, I'M ASSUMING --

12 MS. KAZARIAN: OBJECTION -- OH.

13 BY MS. TOWNSEND:

14 Q -- REGARDING THE CHURCH? SO MAY I ASK WHO
15 THIS INDIVIDUAL IS THAT NOTIFIED YOU ABOUT THE CHURCH?

16 A I DON'T KNOW THIS INDIVIDUAL PERSONALLY.

17 Q SO HOW DID THIS INDIVIDUAL APPROACH YOU TO
18 GIVE YOU THIS INFORMATION?

19 A HE REACHED OUT.

20 Q "HE." AND WHO IS "HE"?

21 A I DON'T KNOW.

22 Q HOW DID HE REACH OUT?

23 A HE REACHED OUT TO MY ATTORNEY.

24 Q OH. SO HE WAS SPEAKING DIRECTLY TO YOUR
25 ATTORNEY?

26 A YES. GIVING US THE TEXT MESSAGES BETWEEN THE
27 TWO OF YOU.

28 Q AH. NOW, DO YOU KNOW IF THIS INDIVIDUAL WAS

1 MAYBE HIRED BY YOUR ATTORNEY?

2 A HE WAS NOT HIRED BY OUR ATTORNEY.

3 Q OKAY. DID YOU KNOW THIS INDIVIDUAL PRIOR
4 TO --

5 A I DON'T EVEN KNOW HIS NAME.

6 Q OKAY. BUT YOU ARE CONFIRMING THAT THERE WAS
7 AN INDIVIDUAL WHO WAS PROVIDING INFORMATION, DIRECTLY
8 SPEAKING WITH ME OVER TEXT MESSAGE, PROVIDING
9 INFORMATION DIRECTLY TO YOUR ATTORNEY. YOU DO CONFIRM
10 THAT THERE WAS AN INDIVIDUAL DOING THAT; CORRECT?

11 A YES.

12 Q OKAY.

13 MS. TOWNSEND: NO FURTHER QUESTIONS, YOUR HONOR.
14 THE COURT: ALL RIGHT.

15 RECALL?

16 MS. KAZARIAN: NO, THANK YOU.

17 THE COURT: ALL RIGHT.

18 MS. LOPEZ, YOU'RE EXCUSED. THANK YOU VERY
19 MUCH FOR YOUR TESTIMONY.

20 MS. KAZARIAN: IF I CAN HAVE ONE MOMENT, YOUR
21 HONOR.

22 THE COURT: SURE.

23 MS. KAZARIAN: I BELIEVE THAT WE WILL RELY ON
24 MR. LOPEZ'S DECLARATION, YOUR HONOR, AND WE HAVE NO
25 FURTHER WITNESSES.

26 THE COURT: OKAY.

27 SO DOES RESPONDENT WANT TO CALL ANY
28 WITNESSES?

1 MS. TOWNSEND: I WOULD LIKE TO CALL PETITIONER
2 MARIO LOPEZ.

3 THE COURT: WHICH SHE CAN.

4 MS. KAZARIAN: YEAH.

5 THE COURT: ALL RIGHT.

6 THE JUDICIAL ASSISTANT: PLEASE RAISE YOUR RIGHT
7 HAND, SIR. DO YOU SOLEMNLY STATE UNDER PENALTY OF
8 PERJURY THAT THE TESTIMONY YOU MAY GIVE IN THE CAUSE
9 NOW PENDING BEFORE THIS COURT SHALL BE THE TRUTH, THE
10 WHOLE TRUTH, AND NOTHING BUT THE TRUTH?

11 THE PETITIONER: YES.

12 THE JUDICIAL ASSISTANT: THANK YOU. PLEASE HAVE
13 A SEAT IN THE WITNESS STAND.

14 THE COURT: WE DON'T NEED TO HAVE HIM STATE AND
15 SPELL HIS NAME.

16 PROCEED.

17

18 CROSS-EXAMINATION

19 BY MS. TOWNSEND:

20 Q HELLO, MR. LOPEZ. CAN YOU WALK ME THROUGH THE
21 EVENTS OF JUNE 15TH? SO YOU WERE AT HOME, AND CAN YOU
22 TELL ME WHAT YOU WERE DOING PRIOR TO THE PROCESS
23 SERVING?

24 A I WAS AT HOME. I BELIEVE I JUST HAD
25 BREAKFAST. I HELPED MY SON AND HIS COACH PACK THEIR
26 BAG BECAUSE THEY WERE ON THEIR WAY TO A WRESTLING CAMP,
27 LIKE MY WIFE HAD SAID. AND I WAS ABOUT TO JUMP IN THE
28 SHOWER, AND THEN MY SON CAME BACK AND SAID, "DAD, THIS

1 LADY SAID THAT YOUR CAR WAS INVOLVED IN A HIT-AND-RUN,
2 AND YOU NEED TO COME OUT AND TALK TO HER." AND THE
3 ONLY REASON I CAME OUT IS BECAUSE, IRONICALLY, THERE
4 WAS A CAR ACCIDENT NOT TOO LONG AGO ON THAT SAME
5 STREET. SO I DON'T KNOW IF THE CAR WAS SIMILAR OR ELSE
6 I WOULDN'T HAVE EVEN PAID ATTENTION. AND SO THEN I
7 WALKED OUTSIDE AND SAW YOU AND WHOEVER WAS WITH YOU AND
8 MY SON AND THE COACH.

9 Q AND SO WHAT WAS YOUR INITIAL FEELING OR
10 REACTION UPON SEEING ME THERE THAT DAY?

11 A I WAS VERY, VERY UPSET BECAUSE YOU'VE BEEN
12 STALKING ME RELENTLESSLY ON SOCIAL MEDIA FOR NO GOOD
13 REASON, AND I KNEW THAT YOU WERE EITHER SUFFERING
14 SERIOUS MENTAL HEALTH ISSUES OR WERE JUST LEGITIMATELY
15 OUT OF YOUR MIND, BUT YOU CAME ACROSS INCREDIBLY
16 DANGEROUS BECAUSE YOU'VE BEEN STALKING ME AT WORK, AND
17 YOU'VE EVEN DOCUMENTED BEING AT MY WORK, SEVERAL TIMES.
18 BRAGGING ABOUT USING THE WIFI, BRAGGING ABOUT TALKING
19 TO OTHER PEOPLE TO TRY TO GET ME SERVED. AND A LOT OF
20 PEOPLE HAVE COME UP TO ME AND SAID, "BE CAREFUL. THIS
21 WOMAN IS OUT OF HER MIND. SHE COMES ACROSS AS
22 DANGEROUS."

23 SECURITY AT NBC HAD ME GO THROUGH SPECIAL
24 ENTRANCES. THEY PROVIDED EXTRA SECURITY. THEY WALKED
25 ME TO MY RADIO STUDIO CITY WALK. THEY PERSONALLY
26 WALKED ME TO MY OFFICE AND PARKING LOT, AND, AGAIN, YOU
27 WERE RELENTLESS AT MY WORK, AND THEN YOU SHOW UP AT MY
28 HOUSE, AND YOU TALKED TO MY KID. AND, YEAH, I WAS

1 PISSED OFF.

2 Q SO YOU WEREN'T FEARFUL, YOU WERE PISSED OFF?

3 A I WAS PISSED OFF AND FEARFUL BECAUSE YOU'RE
4 UNHINGED, AND WHO KNOWS WHAT YOU'RE CAPABLE OF.

5 Q SO --

6 A THERE'S DANGER --

7 THE COURT: HOLD ON.

8 THE WITNESS: -- IN PEOPLE COMING TO YOUR HOME
9 AND TALKING TO YOUR KIDS.

10 THE COURT: ALL RIGHT, MR. LOPEZ. WAIT FOR
11 ANOTHER QUESTION.

12 BY MS. TOWNSEND:

13 Q SO YOU WERE FEARFUL --

14 A YES. I SAID YES.

15 Q OKAY. SO LET'S REAL QUICKLY GO BACK TO NBC.
16 NOW, DO YOU FREQUENTLY FILM DURING THE WEEKENDS AT NBC
17 UNIVERSAL?

18 MS. KAZARIAN: OBJECTION. RELEVANCE.

19 THE COURT: WHAT'S THE RELEVANCE?

20 MS. TOWNSEND: THE RELEVANCE IS I WAS AT NBC
21 UNIVERSAL FOR A CONFERENCE ON A SUNDAY -- SATURDAY, I
22 BELIEVE.

23 THE COURT: WHAT ABOUT, WERE YOU THERE ON THE
24 DATE THAT SHE WAS ACTUALLY THERE?

25 THE WITNESS: I DON'T KNOW THE DATE OFF OF THE
26 TOP OF MY MIND, BUT THERE WERE A FEW VIDEOS, SO I
27 BELIEVE, I'M SURE I WAS. I'M THERE EVERY DAY.

28 THE COURT: OKAY.

1 HE'S THERE MOST DAYS.

2 THAT WOULD INCLUDE WEEKENDS?

3 THE WITNESS: YES. CORRECT.

4 BY MS. TOWNSEND:

5 Q CORRECT. SO TO GET ON NBC UNIVERSAL'S LOT,
6 YOU DO NEED CREDENTIALS; CORRECT?

7 A NOT WHERE I FILM IN PARTICULAR, AND I BELIEVE
8 YOU KNOW THIS ALREADY BECAUSE YOU WERE ALREADY IN THE
9 FORAY THERE, AND WHERE I SHOOT, U.C.P IS OUTSIDE OF THE
10 LOT, PER SE, AND THEIR STUDIO IS OUTSIDE, SO, NO, TO
11 ANSWER YOUR QUESTION. YOU DO NOT NEED CREDENTIALS.

12 Q SO THE VIDEO THAT YOU ARE REFERENCING IN WHICH
13 I STATED I WAS AT NBC UNIVERSAL USING THEIR WIFI, WHERE
14 WAS I? I'M SURE YOU'RE FAMILIAR WITH THE LAYOUT OF NBC
15 UNIVERSAL, AND YOU CAN TELL FROM THE VIDEO. WAS I IN
16 THE AREA OF NBC UNIVERSAL THAT'S ACCESSIBLE TO THE
17 PUBLIC OR THE AREA THAT'S ONLY ACCESSIBLE TO EMPLOYEES?

18 A NO. YOU WERE IN THE AREA THAT'S -- WELL,
19 BOTH, BECAUSE THERE WERE SEVERAL VIDEOS OF YOU COMING
20 TO NBC, AND YOU CAN GET THERE, MANIPULATE YOUR WAY
21 THERE BY NOT HAVING NECESSARILY A CREDENTIAL, BUT YOU
22 WERE LITERALLY OUTSIDE U.C.P, WHERE I SHOOT MY SHOW,
23 "ACCESS HOLLYWOOD."

24 Q AND SO YOU SAY THERE ARE SEVERAL VIDEOS, BUT
25 ARE THESE VIDEOS ALL IN ONE DAY OR ARE THEY OVER
26 SEVERAL DAYS?

27 A OVER SEVERAL DAYS.

28 Q OVER SEVERAL DAYS. OKAY.

1 LET'S GO BACK TO THE DATE OF THE ACTUAL
2 PROCESS SERVING. SO CAN YOU TELL ME WHEN YOU INITIALLY
3 SAW ME ARRIVE WITH A PROCESS SERVER, WHY YOU AND THE
4 WRESTLING COACH THOUGHT TO RUN AND CLOSE THE GATE AND
5 NOT GRAB YOUR SON AND BRING HIM IN WITH YOU?

6 MS. KAZARIAN: OBJECTION. MISSTATES -- ASSUMES
7 FACTS NOT IN EVIDENCE.

8 THE COURT: IT DOES. IT'S ALSO COMPOUND INsofar
9 AS THE WRESTLING COACH'S POSITION.

10 MS. TOWNSEND: FAIR ENOUGH.

11 BY MS. TOWNSEND:

12 Q SO CAN YOU TELL ME WHY YOU DECIDED TO RUN IN
13 TO THE COURTYARD AND CLOSE THE GATE AND NOT GRAB YOUR
14 SON?

15 MS. KAZARIAN: OBJECTION. RELEVANCE.

16 THE COURT: IT'S MINIMALLY RELEVANT.

17 GO AHEAD.

18 THE WITNESS: FIRST OF ALL, NOBODY RAN ANYWHERE.
19 I WANTED TO GET AWAY FROM YOU AS QUICKLY AS POSSIBLE
20 BECAUSE, AGAIN, YOU CAME ACROSS INCREDIBLY UNHINGED AND
21 DANGEROUS. NUMBER TWO, MY WRESTLING COACH DIDN'T LEAVE
22 MY SON FOR A SECOND. LIKE MY WIFE AND I SAID, THEY
23 WERE ON THEIR WAY TO THE CAMP. SO HE PROCEEDED TO PUT
24 MY SON IN HIS CAR AND TAKE HIM TO HIS WRESTLING CAMP.
25 I DIDN'T LEAVE HIM, NOR DID MY WRESTLING COACH EVER
26 LEAVE HIM FOR A SECOND, ESPECIALLY ONCE YOU STARTED
27 BOTHERING HIM.

28 MS. TOWNSEND: IS IT POSSIBLE TO SHOW THE WITNESS

1 THE VIDEO FROM RADAR ONLINE WHERE HE IS CLOSING THE
2 GATE AND WALKING IN WITH THE WRESTLING COACH?

3 THE COURT: WELL, HE WAS IN THE COURTROOM JUST
4 WHEN WE SHOWED IT.

5 MS. TOWNSEND: OH, GOOD. SO WE CAN BASE IT OFF
6 THAT.

7 BY MS. TOWNSEND:

8 Q SO YOU SAW THE VIDEO THAT WAS PUT UP WHEN YOUR
9 WIFE WAS TESTIFYING. SO CAN YOU EXPLAIN, BASED ON WHAT
10 YOU JUST STATED, DID YOU OR DID YOU NOT, WITH THE
11 WRESTLING COACH, TOGETHER, WALK IN TO THE COURTYARD,
12 CLOSE THE GATE AND LEAVE YOUR SON ON THE -- IN THE
13 STREET WITH MYSELF AND THE PROCESS SERVER? DID THAT --
14 DID YOU LEAVE -- DID YOU CLOSE THE GATE, DID YOU LEAVE
15 WITH THE WRESTLER, CLOSE THE GATE, WALK INTO THE
16 COURTYARD, AND WAS YOUR SON ON THE OTHER SIDE WITH
17 MYSELF AND THE PROCESS SERVER?

18 A I NEVER LEFT MY SON ALONE. MY WRESTLING COACH
19 WAS WITH HIM AT ALL TIMES. I CLOSED THE GATE TO GET
20 AWAY FROM YOU. ONCE AGAIN, HE WAS ON HIS WAY TO THE
21 CAMP, AND THE WRESTLING COACH IS A DEAR FRIEND. WE
22 TRUST HIM A HUNDRED PERCENT, AND HE WAS SAFE WITH THE
23 COACH.

24 Q AGAIN, WAS YOUR SON LEFT WITH MYSELF AND THE
25 PROCESS SERVER UPON CLOSING OF THE GATE AND YOU
26 RETRACTING INSIDE TO THE COURTYARD?

27 A I ANSWERED --

28 MS. KAZARIAN: THAT'S BEEN ASKED AND ANSWERED.

1 THE COURT: IT IS ASKED AND ANSWERED. HE SAID
2 THAT THE WRESTLING COACH WAS WITH HIS SON THE ENTIRE
3 TIME.

4 MS. TOWNSEND: THE ENTIRE TIME. OKAY. IS IT
5 POSSIBLE TO SHOW HIM THE VIDEO?

6 THE COURT: SO I'VE WATCHED THE VIDEO A COUPLE OF
7 TIMES, AND I DON'T THINK THAT YOU CAN TELL WHERE HIS
8 SON IS IN THAT VIDEO.

9 MS. TOWNSEND: SO THE SON IN THE VIDEO CLEARLY IS
10 BY THE BLUE CAR --

11 MS. KAZARIAN: OBJECTION.

12 MS. TOWNSEND: -- BLUE VEHICLE.

13 MS. KAZARIAN: NO QUESTION PENDING.

14 BY MS. TOWNSEND:

15 Q SO BASED UPON THE VIDEO, WHO IS THE
16 INDIVIDUAL, BECAUSE IT'S MYSELF AND THE PROCESS SERVER,
17 WHO IS THE INDIVIDUAL THAT IS OUTSIDE THE GATE WITH US?
18 THERE'S A THIRD INDIVIDUAL. CAN YOU IDENTIFY WHO THAT
19 INDIVIDUAL IS?

20 A I DON'T KNOW WHAT YOU'RE TALKING ABOUT. MY
21 SON AND HIS WRESTLING COACH WERE THE ONLY ONES OUTSIDE.
22 YOU WERE THE ONE WITH A TEAM OF PEOPLE THERE BECAUSE
23 YOU SHOT THIS, SHOWING MY HOUSE, THE FRONT OF MY HOUSE
24 AND THE ADDRESS WITH MULTIPLE ANGLES. YOU HAD PEOPLE
25 ACROSS THE STREET. YOU HAD SOMEONE ON THE OTHER SIDE
26 OF THE STREET, AND WHEN I WAS SHOOTING THE VIDEOS THAT
27 YOU CLAIM WERE SHOWING MY HOUSE, I DIDN'T SHOW MY HOUSE
28 AT ALL. THAT WAS IN THE BACK --

1 THE COURT: MR. LOPEZ --

2 THE WITNESS: -- AND THAT WAS IN THE MIDDLE OF
3 THE STREET --

4 THE COURT: YOU'RE SPEAKING A LITTLE BIT FAST --

5 THE WITNESS: I APOLOGIZE.

6 THE COURT: -- FOR THE COURT REPORTER, AND THAT
7 WASN'T ALL RESPONSIVE TO HER QUESTION. I UNDERSTAND
8 THAT YOU'RE UPSET AND EMOTIONAL ABOUT THIS. I
9 UNDERSTAND THAT, BUT PLEASE TRY TO PACE YOURSELF.

10 THE WITNESS: SORRY, YOUR HONOR.

11 BY MS. TOWNSEND:

12 Q SO YOU'RE BASICALLY SAYING YOU DO NOT KNOW WHO
13 THAT THIRD INDIVIDUAL WAS OUTSIDE OF THE GATE WITH THE
14 PROCESS SERVER AND I; CORRECT?

15 THE WITNESS: I DON'T KNOW WHAT SHE'S TALKING
16 ABOUT.

17 THE COURT: SO HE DOESN'T KNOW WHO YOU'RE
18 REFERRING TO.

19 MS. TOWNSEND: SURE.

20 THE COURT: THAT'S -- THAT'S THE ANSWER.

21 BY MS. TOWNSEND:

22 Q OKAY. SO DURING THE PROCESS SERVING, AFTER
23 YOU CLOSED THE GATE, YOU HAD MADE A COMMENT. CAN YOU
24 DESCRIBE TO THE COURT WHAT THAT COMMENT WAS? I'M
25 ASSUMING IT WAS DIRECTED TOWARDS ME; IS THAT CORRECT?

26 A I DON'T REMEMBER --

27 MS. KAZARIAN: OBJECTION. COMPOUND.

28 MS. TOWNSEND: SO I APOLOGIZE --

1 THE COURT: WAS THERE A COMMENT THAT YOU MADE
2 TOWARDS THE RESPONDENT IN THAT VIDEO?

3 THE WITNESS: I DON'T REMEMBER EXACTLY. I'M SURE
4 IT WASN'T VERY NICE SINCE SHE JUST INTRUDED ON MY
5 PRIVATE PROPERTY. SO I DON'T REMEMBER SPECIFICALLY.

6 THE COURT: HE DOESN'T REMEMBER THE SPECIFIC
7 STATEMENT.

8 MS. TOWNSEND: IS IT POSSIBLE TO REPLAY THE VIDEO
9 THAT WE HAD PLAYED WHERE --

10 THE COURT: YOU'RE ASKING TO REFRESH HIS
11 RECOLLECTION?

12 MS. TOWNSEND: YES, PLEASE.

13 THE COURT: I GUESS I SHOULD ASK.

14 MR. LOPEZ, DO YOU THINK IT WOULD REFRESH
15 YOUR RECOLLECTION TO WATCH THE VIDEO?

16 THE WITNESS: I'M SURE IT WOULD.

17 THE COURT: ALL RIGHT.

18

19 (INAUDIBLE.)

20

21 THE COURT: DID THAT REFRESH YOUR RECOLLECTION?

22 THE WITNESS: YEAH. LIKE I THOUGHT, I PROBABLY
23 MUMBLED SOMETHING THAT WASN'T TOO NICE, BUT, AGAIN, IT
24 WAS FATHER'S DAY. SHE JUST WAS, YOU KNOW -- AGAIN,
25 UPSET ABOUT TALKING TO MY SON AND COMING ON MY
26 PROPERTY. SO I IMAGINE IT WAS BAD. I WAS MUMBLING AS
27 I WALKED AWAY. I COULDN'T BELIEVE IT GOT TO THIS POINT
28 BECAUSE SHE HAD BEEN AT MY WORK, AND NOW SHE'S AT MY

1 HOUSE. SO THAT'S WHY I WAS SAYING THAT.

2 THE COURT: OKAY.

3 BY MS. TOWNSEND:

4 Q SO JUST PRIOR, A FEW SECONDS PRIOR TO THIS
5 SCENE, THERE WAS ANOTHER INDIVIDUAL DEPICTED IN THERE
6 WITH YOU. CAN YOU TELL ME WHO THAT INDIVIDUAL WAS?

7 A I DON'T KNOW WHO YOU'RE TALKING ABOUT.

8 Q LET'S SEE IF IT'LL PLAY.

9 LOOKS LIKE THERE'S TWO INDIVIDUALS BACK THERE.
10 CAN YOU TELL ME --

11 A THERE'S NO TWO INDIVIDUALS. I WAS ALONE.

12 Q YOU WERE ALONE?

13 A ALONE. UNLIKE YOU --

14 Q I SEE --

15 THE COURT: SO I THINK SHE'S REFERRING TO THIS
16 PERSON THAT'S ON THE LEFT HERE. THERE'S SOMEONE THAT
17 LOOKS LIKE THEY'RE MOVING THROUGH THE YARD JUST BEFORE
18 YOU.

19 DID YOU SEE THAT?

20 THE WITNESS: PERHAPS THAT WAS MY WRESTLING -- I
21 DON'T REMEMBER TO BE HONEST WITH YOU.

22 THE COURT: IT DOES LOOK LIKE THERE'S THIS
23 PERSON, AS A SEPARATE PERSON.

24 THE WITNESS: OR IS THAT MY SON, I DON'T KNOW. I
25 CAN'T REMEMBER IF IT WAS MY SON OR THE WRESTLING COACH.

26 THE COURT: SO HE DOESN'T REMEMBER WHO THAT IS.
27 BY MS. TOWNSEND:

28 Q YOU DON'T REMEMBER WHO THAT IS. OKAY.

1 A IT WAS EITHER ONE OF THOSE TWO.

2 THE COURT: OKAY.

3 BY MS. TOWNSEND:

4 Q IT WAS EITHER YOUR SON OR THE WRESTLING COACH.
5 SO ONE OF THE TWO. SO THE OTHER PARTY WHO WAS OUTSIDE
6 OF THE GATE EARLY ON THIS IN THIS VIDEO, IT COULD BE
7 PRESUMED THAT WAS EITHER THE WRESTLING COACH OR YOUR
8 SON.

9 LET'S SEE IF IT WILL PLAY FROM THE BEGINNING.

10 MS. KAZARIAN: OBJECTION.

11 MS. TOWNSEND: IT WASN'T A QUESTION. I
12 APOLOGIZE.

13 IS THERE A WAY TO START IT?

14 BY MS. TOWNSEND:

15 Q DO YOU SEE THIS INDIVIDUAL? HE'S BLURRED OUT,
16 HE'S WALKING UP, AND HE'S RIGHT BEHIND THE PROCESS
17 SERVER. DO YOU SEE THAT INDIVIDUAL?

18 A NO. THIS IS A GRAINY VIDEO. I DON'T KNOW IF
19 YOU HAD OTHER PEOPLE THERE OUTSIDE. CLEARLY THERE ARE
20 PEOPLE SHOOTING --

21 Q SO THERE'S TWO INDIVIDUALS, MYSELF AND THE
22 PROCESS SERVER ON THE RIGHT-HAND SIDE. DO YOU SEE THIS
23 INDIVIDUAL NEXT TO THE BLUE CAR?

24 A THAT'S ME.

25 Q THAT'S YOU, BUT THERE'S ANOTHER INDIVIDUAL TO
26 THE LEFT OF THAT. DO YOU SEE THAT INDIVIDUAL THERE?

27 MS. KAZARIAN: I DON'T.

28 THE WITNESS: I DON'T --

1 THE COURT: YOU CAN ACTUALLY SEE THE OUTLINE OF A
2 PERSON NOW THAT I'M LOOKING VERY CLOSELY, BUT I'M ALSO
3 WONDERING WHAT THE RELEVANCE IN THIS LINE OF
4 QUESTIONING IS.

5 MS. TOWNSEND: THE RELEVANCE IS THERE ARE TWO
6 INDIVIDUALS THERE OUTSIDE OF JUST MR. LOPEZ. THERE IS
7 SOMEBODY INSIDE THE COURTYARD WITH MR. LOPEZ LATER ON
8 IN THE VIDEO, AND THEN THERE'S THIS INDIVIDUAL OUT
9 HERE.

10 BY MS. TOWNSEND:

11 Q SO CAN YOU TELL ME BASED ON THIS NEW SCENE
12 HERE IN THE VIDEO, DO YOU KNOW WHO THIS INDIVIDUAL IS?
13 HE'S -- HE OR SHE IS APPROXIMATELY NO TALLER THAN, YOU
14 KNOW, THE HOOD OF THAT VEHICLE. DO YOU KNOW OR DO YOU
15 HAVE ANY IDEA WHO THIS INDIVIDUAL WAS?

16 A I DON'T KNOW HOW MANY TIMES I HAVE TO SAY IT.
17 IT WAS ONLY MY SON AND THE WRESTLING COACH THAT WERE
18 THERE. I DON'T KNOW --

19 Q IS IT POSSIBLE THAT THIS COULD HAVE BEEN YOUR
20 SON?

21 MS. KAZARIAN: OBJECTION. IMPROPER QUESTION.
22 "IS IT POSSIBLE?"

23 BY MS. TOWNSEND:

24 Q IS THIS YOUR SON OR THE WRESTLING COACH?

25 MS. KAZARIAN: OBJECTION. ASKED AND ANSWERED.

26 THE COURT: WELL, HE'S SAYING THAT THOSE ARE THE
27 ONLY TWO PEOPLE THAT WERE PRESENT, OTHER THAN YOU AND
28 YOUR PROCESS SERVER AND SOME PEOPLE YOU MAYBE HAD

1 ACROSS THE STREET.

2 BY MS. TOWNSEND:

3 Q SO THIS IS NOT A NEIGHBOR?

4 THE COURT: HE DOESN'T KNOW WHO IT IS.

5 MS. TOWNSEND: HE DOESN'T KNOW WHO IT IS. OKAY.
6 FAIR ENOUGH. I'LL MOVE ON TO MY NEXT LINE OF
7 QUESTIONING.

8 BY MS. TOWNSEND:

9 Q SO YOUR WIFE HAD MENTIONED THAT YOU WERE MADE
10 AWARE BY AN INDIVIDUAL THAT I WAS APPARENTLY LOOKING
11 FOR -- OR TO GEOLOCATE, ACCORDING TO WHAT YOUR WIFE HAD
12 TESTIFIED, THE LOCATION OF THE CHURCH YOU ATTEND; IS
13 THAT CORRECT?

14 MS. KAZARIAN: OBJECTION. ASSUMES FACTS NOT IN
15 EVIDENCE.

16 MS. TOWNSEND: SO --

17 THE COURT: HOLD ON. SO THERE WASN'T ACTUALLY A
18 QUESTION, I GUESS.

19 MS. TOWNSEND: YOU'RE RIGHT.

20 THE COURT: IT WAS MORE OF AN ISSUE.

21 MS. TOWNSEND: LET ME REPHRASE THAT. I'M
22 THINKING OUT LOUD. I APOLOGIZE.

23 BY MS. TOWNSEND:

24 Q SO YOUR WIFE HAD TESTIFIED THAT THERE WAS AN
25 INDIVIDUAL THAT WAS GIVING INFORMATION TO YOUR ATTORNEY
26 REGARDING YOUR LOCATION AND IN REFERENCE TO A CHURCH.
27 IS THIS INDIVIDUAL SOMEBODY THAT YOU PERSONALLY KNOW?

28 A NO.

1 Q IS THIS INDIVIDUAL SOMEBODY THAT YOU
2 PERSONALLY HIRED?

3 A NO.

4 Q IS THIS INDIVIDUAL SOMEONE THAT YOU KNOW
5 EITHER YOUR COUNSEL HIRED OR -- HOW DID -- CAN YOU TELL
6 ME HOW THIS INDIVIDUAL CAME TO CONTACT YOU?

7 MS. KAZARIAN: OBJECTION. ASSUMES FACTS NOT IN
8 EVIDENCE.

9 THE COURT: SUSTAINED.
10 BY MS. TOWNSEND:

11 Q THIS INDIVIDUAL THAT WAS PROVIDING YOU
12 INFORMATION --

13 MS. KAZARIAN: OBJECTION. ASSUMES FACTS NOT IN
14 EVIDENCE.

15 THE COURT: SHE DIDN'T FINISH THE QUESTION, BUT
16 IT DOES SOUND LIKE IT'S GOING TO.
17 BY MS. TOWNSEND:

18 Q THIS INDIVIDUAL THAT YOUR WIFE HAD SAID WAS
19 PROVIDING YOU INFORMATION, YOU DIDN'T KNOW HIM. I'M
20 ASSUMING IT'S A HIM. SO HOW WERE YOU MADE AWARE THAT
21 THAT INFORMATION WAS BEING GIVEN TO YOUR ATTORNEY?

22 A MY ATTORNEY BROUGHT IT TO MY ATTENTION.

23 Q OKAY. YOUR ATTORNEY BROUGHT IT TO YOUR
24 ATTENTION THAT SOMEBODY HAD COME FORWARD AND WAS
25 PROVIDING INFORMATION TO HER IN REGARDS TO MYSELF, THE
26 RESPONDENT?

27 A CORRECT.

28 Q NOW, THIS INDIVIDUAL, AND I DON'T KNOW IF I

1 CAN --

2 THE COURT: SO HE DOESN'T KNOW WHO THE INDIVIDUAL
3 IS. I SEE YOU FLIPPING THROUGH A LOT OF PHOTOS. HE'S
4 NOT GOING TO BE ABLE TO IDENTIFY --

5 MS. TOWNSEND: NO. NO. I'M SORRY. I'M LOOKING
6 FOR SOMETHING IN PARTICULAR.

7 THE COURT: OKAY.

8 BY MS. TOWNSEND:

9 Q SO, MR. LOPEZ, YOU HAVE A, I'M ASSUMING, A
10 VERIFIED TIKTOK ACCOUNT; CORRECT?

11 A CORRECT.

12 Q AND DO YOU OPERATE THAT VERIFIED TIKTOK
13 ACCOUNT?

14 A SOMETIMES. I HAVE SOMEONE THAT WORKS FOR ME.

15 Q SO --

16 A -- THAT OPERATES IT ALSO.

17 Q -- THE MAJORITY OF THE TIME, YOU ARE OPERATING
18 IT; CORRECT?

19 A NO. THAT IS INCORRECT. MY TIKTOK ACCOUNT, I
20 DON'T OPERATE THE MAJORITY OF THE TIME. SOMEONE THAT
21 WORKS FOR ME DOES.

22 Q IS THE INDIVIDUAL THAT OPERATES THE TIKTOK
23 ACCOUNT, ARE THEY UNDER -- ARE THEY OPERATING UNDER
24 YOUR DIRECTION?

25 MS. KAZARIAN: OBJECTION. RELEVANCE.

26 THE COURT: SO IS THIS HAVING TO DO WITH THE
27 TIKTOK POSTS?

28 MS. TOWNSEND: NO. IT'S HAVING TO DO WITH

1 INTERACTION OF THE TIKTOK ACCOUNT ITSELF.

2 THE COURT: OKAY. I'M NOT SURE WHAT THE
3 RELEVANCE IS.

4 MS. TOWNSEND: THE RELEVANCE IS HIS VERIFIED
5 TIKTOK ACCOUNT HAS BEEN ACTIVELY LIKING CERTAIN POSTS
6 ON MY OWN TIKTOK. SO I'M TRYING TO ESTABLISH IF THAT
7 IS AN AGENT OR A MANAGER THAT HE IS DIRECTLY WORKING
8 WITH OR IF IT'S HIM HIMSELF.

9 THE COURT: OKAY. OVERRULED.

10 ARE YOU DIRECTING THE PERSON WHO MANAGES
11 YOUR TIKTOK ACCOUNT?

12 THE WITNESS: NO. THE SOCIAL MEDIA MANAGER
13 ESSENTIALLY MANAGES IT. THEY ARE SORT OF DIRECTED SORT
14 OF CONTENT THAT GOES ON THERE. TIKTOK, SPECIFICALLY,
15 BECAUSE I'M OLD, I DON'T REALLY KNOW HOW IT WORKS SO
16 MUCH. I LET HIM KIND OF RUN WITH IT. HE'S A YOUNG
17 GUY. HE'S SOCIAL MEDIA SAVVY. SO HE PRETTY MUCH HAS
18 DONE ANYTHING -- EVERYTHING ON TIKTOK. I DON'T EVEN
19 HARDLY GO ON TIKTOK. INSTAGRAM, I HANDLE A LITTLE BIT
20 MORE. SOMETIMES X, AND THAT'S ABOUT IT. REALLY JUST
21 INSTAGRAM, TO BE HONEST WITH YOU.

22 THE COURT: OKAY. SO SOMEONE ELSE IS MANAGING
23 THE TIKTOK. NOT REALLY MUCH OVERSIGHT OR DIRECTION
24 FROM MR. LOPEZ.

25 BY MS. TOWNSEND:

26 Q SO ANY SORT OF ENGAGEMENT WITH YOUR TIKTOK
27 ACCOUNT OUTSIDE OF POSTING SPECIFIC CONTENT RELATED TO
28 YOUR SOCIAL MEDIA STRATEGY, IS THIS PERSON ALLOWED TO

1 BE ENGAGING WITH OTHER ACCOUNTS IN THE FORM OF LIKING
2 POSTS?

3 A WE'VE NEVER HAD THAT PARTICULAR DISCUSSION. I
4 JUST ASK HIM TO KEEP THE SOCIAL MEDIA ACCOUNT ACCORDING
5 TO MY BRAND, WHICH IS FAMILY, FAITH, FITNESS, FUN.
6 IT'S LIGHTHEARTED. IT'S POSITIVE. WE HAVE FUNNY
7 MEMES. SOMETIMES FUNNY VIDEOS. AND THAT'S
8 ESSENTIALLY, AS LONG AS HE KEEPS IT IN THAT REALM, I'M
9 FINE. I DON'T KNOW WHAT HE DOES AS FAR AS ENGAGEMENT.
10 I TRUST HIM. SO I'M NOT AWARE, TO BE HONEST WITH YOU,
11 BECAUSE, ONCE AGAIN, I DON'T GO ON TIKTOK.

12 Q OKAY. SO IS PART OF THE ANTI-SLAPP MOTION ON
13 EXHIBIT A, I HAVE --

14 MS. TOWNSEND: IF I CAN PUT THIS UP HERE SO I CAN
15 SHOW THE WITNESS THAT.

16 THE COURT: OKAY. LET ME JUST SWITCH THE
17 OVERHEAD.

18 MS. TOWNSEND: THANK YOU, YOUR HONOR.

19 THE COURT: IT'LL SHOW UP IN FRONT OF YOU IN A
20 SECOND.

21 BY MS. TOWNSEND:

22 Q SO AS PART OF THE ANTI-SLAPP MOTION, I HAVE A
23 COUPLE EXHIBITS IN WHICH YOUR VERIFIED -- I BELIEVE
24 YOUR VERIFIED TIKTOK ACCOUNT IS LIKING A COUPLE VIDEOS
25 IN REGARD TO THE CONTINUANCE THAT WAS GRANTED IN THIS
26 PETITION.

27 CAN YOU VERIFY THAT THIS IS YOUR ACCOUNT?

28 A LOOKS LIKE MY ACCOUNT. THAT'S MY BABY

1 PICTURE.

2 Q OKAY. WAS THIS YOU WHO LIKED THESE TWO
3 VIDEOS?

4 A NO. MAYBE MY SOCIAL MEDIA GUY, ALEX
5 STEINHOWER, BUT I DID TELL HIM, "LET ME KNOW IF THIS
6 PSYCHOPATH CONTINUES TO STALK ME ON TIKTOK BECAUSE I
7 JUST WANT TO BE KEPT ABREAST OF HER WILD VIDEOS AND IF
8 SHE MENTIONED MY FAMILY AGAIN." SO PERHAPS IN HIM
9 MONITORING MY TIKTOK, HE SAW ONE OF YOUR VIDEOS AND
10 MAYBE ACCIDENTALLY LIKED IT. I'M SPECULATING, BUT
11 THAT'S ALL THAT COULD PROBABLY HAPPEN.

12 Q NOW, THIS VIDEO HERE, I BELIEVE IT WAS
13 REFERRING TO THE NBC UNIVERSAL INFORMATION CONSPIRING.
14 I THINK YOU REMEMBER THE CONTENT OF THE VIDEO. IS THIS
15 YOUR ATTORNEY, YOUR COUNSEL'S TIKTOK ACCOUNT, AS FAR AS
16 YOU KNOW?

17 MS. KAZARIAN: OBJECTION. FOUNDATION.

18 THE COURT: WELL, DO YOU KNOW IF IT'S HER TIKTOK
19 ACCOUNT?

20 THE WITNESS: I DON'T, BECAUSE ONCE AGAIN, I
21 DON'T GO ON TIKTOK.

22 THE COURT: ALL RIGHT.

23 NO FOUNDATION. SUSTAINED.

24 BY MS. TOWNSEND:

25 Q SO DO YOU HAPPEN TO KNOW IF THE INDIVIDUAL
26 THAT WAS PROVIDING INFORMATION TO YOUR ATTORNEY IN
27 REGARD TO THE GEOLOCATION OF THE CHURCH THAT YOUR WIFE
28 HAD TESTIFIED OF, DO YOU KNOW IF THIS IS HIS ACCOUNT?

1 THE COURT: HE'S ALREADY TESTIFIED THAT HE
2 DOESN'T KNOW WHO THAT PERSON IS.

3 MS. TOWNSEND: YES.

4 BY MS. TOWNSEND:

5 Q DO YOU -- I'M NOT GOING TO ASK THAT.

6 MR. LOPEZ, SO WERE -- YOU FREQUENTLY ATTEND
7 CHURCH SUNDAYS; IS THAT CORRECT?

8 MS. KAZARIAN: OBJECTION. RELEVANCE.

9 THE COURT: WHAT'S THE RELEVANCE?

10 MS. TOWNSEND: THE RELEVANCE IS THE INDIVIDUAL
11 THAT MS. LOPEZ TESTIFIED ABOUT THAT WAS PROVIDING OR
12 WAS GEOLOCATING THE CHURCH, HAD PROVIDED INFORMATION TO
13 ME ON WHERE HE WOULD BE THAT DAY. SO THE RELEVANCE IS,
14 WAS HE PLANNING ON ATTENDING CHURCH THAT DAY OR NOT, IN
15 THAT -- IN SO MUCH THAT IT ESTABLISHES THAT THERE WAS
16 AN INDIVIDUAL THAT THEY WERE COORDINATING WITH TO, I
17 BELIEVE, FEED ME FALSE INFORMATION IN REGARD TO
18 DAMAGING MY CREDIBILITY FOR THE RESPONSE TO THIS
19 PETITION.

20 THE COURT: I'M GOING TO SUSTAIN THE RELEVANCE
21 OBJECTION. THAT SEEMS VERY ARTICULATED.

22 MS. TOWNSEND: SURE.

23 YOUR HONOR, CAN I TAKE A QUICK BREAK?

24 THE COURT: WE CANNOT TAKE A QUICK BREAK. IF WE
25 BREAK, WE ARE BREAKING FOR THE DAY. I WOULD REALLY
26 LIKE TO FINISH MR. LOPEZ'S TESTIMONY.

27 MS. TOWNSEND: I APOLOGIZE. I'M TRYING TO LOOK
28 FOR A PARTICULAR QUESTION I HAD, BUT I CAN'T FIND THE

1 SUPPORTING DOCUMENT.

2 GIVE ME ONE MOMENT. I DO APOLOGIZE.

3 THE COURT: OKAY.

4 BY MS. TOWNSEND:

5 Q MR. LOPEZ, HAVE I EVER INTERACTED ON YOUR
6 PERSONAL TIKTOK ACCOUNT?

7 MS. KAZARIAN: OBJECTION. FOUNDATION.

8 THE COURT: WOULD YOU KNOW?

9 THE WITNESS: I WOULDN'T KNOW.

10 THE COURT: OKAY.

11 NO FOUNDATION. SUSTAINED.

12 BY MS. TOWNSEND:

13 Q MR. LOPEZ, HAVE I EVER MADE ANY THREATS OF
14 VIOLENCE TO YOU PERSONALLY?

15 A OVER SOCIAL MEDIA.

16 Q CAN YOU DETAIL HOW?

17 A "I'M GOING TO TAKE YOU DOWN." "YOU'RE DONE."
18 IF I CAN QUOTE, "YOU'RE FUCKING DONE." "YOU'RE OVER
19 WITH."

20 YES.

21 Q AND --

22 A MANY, ACTUALLY.

23 Q AND CAN YOU TELL ME WHERE I COULD LOCATE THESE
24 PARTICULAR COMMENTS IN THE PETITION BECAUSE THEY WERE
25 NOT REFERENCED.

26 A I COULDN'T TELL YOU SPECIFICALLY, BUT I'VE
27 VISIBLY SEEN THEM ON SOCIAL MEDIA IN ONE OF YOUR MANY
28 PROFANITY-LACED TIRADES.

1 Q SO, JUST BACK ON THAT NOTE, THE DAY OF THE
2 PROCESS SERVING, DID I HAVE ANY PROFANITY TOWARDS YOU?

3 A YES, YOU DID.

4 Q OKAY. SO WHAT PROFANITY?

5 A YES, YOU DID. AND YOU CONVENIENTLY STARTED TO
6 RECORD AFTER YOUR F-BOMB TIRADE, AGAIN, IN FRONT OF MY
7 11-YEAR-OLD SON, AND AFTER CUSSING ME OUT. AND THEN
8 WITH YOUR SMUG, SMART-ASS REMARK ABOUT IT BEING
9 FATHER'S DAY, AND THEN YOU CUT OFF THE VIDEO, AND THEN
10 YOU CONTINUED TO CURSE ME OUT, YET AGAIN. IT WAS VERY
11 CONVENIENT HOW YOU STOPPED THE VIDEO BEFORE YOU STARTED
12 YOUR, AGAIN, PROFANITY-LACED TIRADES.

13 DO YOU RECOLLECT?

14 Q CAN YOU PLEASE EXPLAIN --

15 THE COURT: DON'T QUESTION HER BACK.

16 BY MS. TOWNSEND:

17 Q CAN YOU TELL ME WHAT PROFANITY-LACED
18 STATEMENTS I MADE?

19 A YOU WANT TO GET SPECIFIC? "IT'S YOUR FUCKING
20 DAY. HAPPY FUCKING FATHER'S DAY. YOU THINK YOU CAN
21 GET AWAY WITH THIS, MOTHERFUCKER."

22 IF YOU WANT ME TO KEEP GOING, I CAN.

23 Q AND AT WHAT POINT DID THIS OCCUR? BEFORE OR
24 AFTER THE VIDEO RECORDING?

25 A LIKE I JUST SAID, BEFORE. THEN YOU STARTED
26 RECORDING WITH THE 12-YEAR-OLD SERVER THAT YOU CAME
27 WITH, AND THEN AFTER YOU DECIDED TO JUST THROW IT,
28 BECAUSE I TOLD YOU, "DON'T COME ON MY PROPERTY," THEN

1 YOU STOPPED THE VIDEO AND STARTED, YET AGAIN.

2 Q SO THE JUDGE HAD PUT UP THE VIDEO IN WHICH WE
3 WERE MIC'D. THE PROCESS SERVER WAS MIC'D, AND I DID
4 NOT DETECT ANY SORT OF LANGUAGE TO THAT EFFECT --

5 THE COURT: SO THIS ISN'T A QUESTION.

6 MS. TOWNSEND: OKAY. CORRECT.

7 BY MS. TOWNSEND:

8 Q SO IN THAT VIDEO THAT YOU WATCHED, DID YOU
9 HEAR ANY OF THE LANGUAGE THAT YOU'RE REFERENCING AS
10 PART OF THAT VIDEO?

11 A LIKE I JUST MENTIONED, IT WAS VERY CONVENIENT
12 THAT IT HAPPENED BEFORE AND AFTER. SO I DON'T KNOW IF
13 YOUR LITTLE MINIONS ACROSS THE STREET WERE
14 CHOREOGRAPHING AT THE SAME TIME TO PLAN THIS AMBUSH,
15 BUT THAT'S EXACTLY WHAT HAPPENED.

16 Q SO DID THIS HAPPEN BEFORE YOU ARRIVED OUTSIDE
17 THE GATE?

18 A WHAT? I DON'T UNDERSTAND THE QUESTION. WHAT?

19 Q SO WHEN THE PROCESS SERVER, IN THE VIDEO, WHEN
20 THE PROCESS SERVER AND I WALK UP TO THE GATE, THAT'S
21 WHEN YOU APPEAR. SO YOUR TESTIMONY IS THAT THIS
22 PROFANITY-LACED STATEMENT I MADE, IT HAPPENED PRIOR TO
23 YOU ARRIVING AT THE GATE; IS THAT CORRECT?

24 A YOU SAW ME AS I WAS EXITING MY FRONT DOOR
25 GOING TO THE FRONT YARD. YOU STARTED YELLING. I
26 STARTED -- WHEN I CONFIRMED IT WAS YOU AND YOU SAW ME
27 MAKE A REACTION, LIKE, "I CAN'T BELIEVE THIS," YOU
28 FINISHED CUSSING AND TELLING ME OFF, AND AFTER YOU

1 SPOKE WITH MY SON, THEN YOU STARTED RECORDING, AND
2 THAT'S WHAT WE SEE IN THE VIDEO. AND THEN YOU SHUT IT
3 OFF, AND YOU CONTINUED, YET AGAIN, LIKE I SAID.

4 MS. TOWNSEND: OKAY. THAT'S ALL I HAVE, YOUR
5 HONOR.

6 THE COURT: ALL RIGHT.

7 YOU'RE EXCUSED.

8 THE WITNESS: THANK YOU.

9 THE COURT: SORRY. DID YOU HAVE ANYTHING?

10 MS. KAZARIAN: NO.

11 THE COURT: OKAY.

12 YOU'RE EXCUSED.

13 I'M ASSUMING THAT THE RESPONDENT IS GOING TO WANT
14 TO TESTIFY ON HER OWN BEHALF.

15 MS. TOWNSEND: YES. CAN WE HAVE AN HOUR FOR
16 THAT?

17 THE COURT: I SHOULD ASK. HAS PETITIONER RESTED?

18 MS. KAZARIAN: I'M SORRY -- YES.

19 THE COURT: OKAY. THAT'S RIGHT. YOU DID ALREADY
20 REST.

21 YOU CALLED MR. LOPEZ. SO YOU'RE GOING TO
22 NEED YOUR TESTIMONY. ARE YOU ANTICIPATING TESTIMONY
23 FROM ANYONE ELSE?

24 MS. TOWNSEND: YES. I'D LIKE TO -- I'D HAVE TO
25 FIND OUT IF I CAN GET THE INDIVIDUALS I HAVE HERE.
26 THEY WERE PART OF THE -- THEY WERE HERE FOR THE FIRST
27 HEARING, AND I WAS WONDERING IF I COULD BRING THEM IN
28 AS A WITNESS ON --

1 THE COURT: SORRY. THE PEOPLE WHO ARE CURRENTLY
2 IN COURT? WELL, MA'AM, THEY JUST SAT IN HERE FOR THE
3 ENTIRETY OF THE HEARING. REMEMBER AT THE BEGINNING
4 WHEN I SAID ANY WITNESSES IN HERE, THEY NEED TO LEAVE?

5 MS. TOWNSEND: YES. I APOLOGIZE. SO I WILL NOT
6 BRING THEM FORWARD AS A WITNESS. SO IT'S JUST GOING TO
7 BE MY TESTIMONY THEN --

8 THE COURT: OKAY.

9 MS. TOWNSEND: -- FOR ABOUT AN HOUR.

10 THE COURT: ALL RIGHT. WHO IS AVAILABLE ON
11 FRIDAY AFTERNOON?

12 MS. KAZARIAN: YES. I'M AVAILABLE.

13 MS. TOWNSEND: YES.

14 THE COURT: EXCELLENT. FRIDAY AFTERNOON, 1:30.
15 WE'LL SEE YOU BACK THEN.

16 MS. TOWNSEND: THANK YOU, YOUR HONOR.

17 MS. KAZARIAN: AND THE TEMPORARY ORDERS REMAIN IN
18 PLACE?

19 THE COURT: YES. THE TEMPORARY ORDERS DO REMAIN
20 IN PLACE. OUR JUDICIAL ASSISTANT WILL NEED JUST A
21 MINUTE TO PRINT THOSE OUT.

22 MS. KAZARIAN: THANK YOU.

23

24 (WHEREUPON THE PROCEEDINGS
25 CONCLUDED.)

26

27

28

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA
2 FOR THE COUNTY OF LOS ANGELES
3 DEPARTMENT 65 HON. KIMBERLY REPECKA, JUDGE
4
5 IN THE MATTER OF
6 MARIO LOPEZ,)
7 PETITIONER,) SUPERIOR COURT CASE
8 VS.) NO. 25STRO03858
9 DESIREE TOWNSEND,)
10 RESPONDENT.) REPORTER'S CERTIFICATE
11)
12)

13 I, CAROLINA VIZCARRA, OFFICIAL REPORTER OF THE SUPERIOR
14 COURT OF THE STATE OF CALIFORNIA, FOR THE COUNTY OF LOS
15 ANGELES, DO HEREBY CERTIFY THAT THE FOREGOING PAGES 1 THROUGH
16 70 INCLUSIVE, COMPRISE A FULL, TRUE, AND CORRECT TRANSCRIPT
17 OF THE PROCEEDINGS HELD IN THE ABOVE-ENTITLED MATTER ON
18 AUGUST 5, 2025.

19
20
21 CAROLINA VIZCARRA

22 CAROLINA VIZCARRA, CSR #14827

23 OFFICIAL REPORTER
24
25
26
27
28

Defendant's counsel has consented to electronic service in this matter. Accordingly, I caused the foregoing documents, entitled **REQUEST FOR JUDICIAL NOTICE** to be served electronically on the interested parties in this action as follows:

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By: 
DESIREE GUERRIERE TOWNSEND