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8	SUPERIOR C	COURT OF THE STATE OF CALIFORNIA		
9	COUNTY OF LOS ANGELES – CENTRAL DISTRICT, FAMILY LAW			
10		·		
11	NICOLE PRAUSE,	Case No.: 20STRO01022		
12	Petitioner,	EVIDENTIARY OBJECTIONS TO THE DECLARATION OF NICOLE PRAUSE IN SUPPORT OF PETITIONER'S OPPOSITION TO RESPONDENT'S MOTION TO STRIKE		
13	v.			
14	GARY WILSON,			
15	Respondent	THE REQUEST FOR A CIVIL HARASSMENT RESTRAINING ORDER		
16		Date: August 6, 2020 Time: 8:30 a.m.		
17		Dept.: 22		
18				
19	Respondent GARY WI	ILSON ("Wilson") hereby submits the following evidentiary		
20	objections to the Declaration of Petitioner NICOLE PRAUSE's ("Prause") Opposition (the			
21	"Opposition") to Wilson's Motion to Strike the Request for a Civil Harassment Restraining Order			
22	(the "Motion"):			
23	Portion of Declaration	Grounds for Objection Ruling on the Objection		
24	Objected To			
25	1. Paragraph 3, Page	Lack of foundation (Cal. Evid.		
26	1:12-13.	Code Sections 402-403);		
27	" my current belief that	speculation (Cal. Evid. Code		

Section 702(a)); conclusory

Wilson poses a credible threat

Portion of Declaration	Grounds for Objection	Ruling on the Objection
Objected To		
of violence against me as I am	(Cal. Evid. Code Sections 801-	
in fear for my safety whether	803).	
at home or at work."		
2. Paragraph 4, Page	Irrelevant (Cal. Evid. Code	Sustained:
1:14-18.	Sections 210, et seq., 350-	Overruled:
"The list of acts details a long	351); speculation (Cal. Evid.	
history of conduct of Wilson,	Code Section 702(a));	
which initially started as him	improper opinion testimony of	
stating disapproval and	a lay witness (Cal. Evid. Code	
disagreement with my research	Section 800); improper legal	
in pornography. I am not	conclusion (Cal. Evid. Code	
seeking to restrain Wilson's	Section 310).	
right to state his opinions on		
pornography or those who		
conduct academic studies on		
pornography. Wilson's		
immediate motion is		
misleading on this point – I am		
requesting relief to protect me		
from physical harm at the		
hands of Wilson."		
3. Paragraph 7, Page 2:1-	Irrelevant (Cal. Evid. Code	Sustained:
8.	Sections 210, et seq., 350-	Overruled:
"One such opponent of	351); lack of foundation (Cal.	
pornography is Wilson who	Evid. Code Sections 402, 403);	
hosts websites named	speculation (Cal. Evid. Code	
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Portion of Declaration	Grounds for Objection	Ruling on the Objection
Objected To		
'YourBrainOnPorn',	Section 702(a)); improper	
'PornStudyCritiques', and	opinion testimony of a lay	
YourBrainRebalanced.' He	witness (Cal. Evid. Code	
also runs social media	Section 800); inadmissible	
websites including Twitter	conclusory statements (Cal.	
(@YourBrainOnPorn) and	Evid. Code sections 800 –	
Facebook (YourBrainOnPorn).	803); Request for Restraining	
My research results versus	Order speaks for itself;	
Wilson's beliefs are NOT the	inadmissible legal conclusions	
subject of any aspect of my	(Cal. Evid. Code Section 310).	
Petition, rather to the extent an		
appropriate order is to be		·
crafted preventing harassment,		
I am seeking to address		
Wilson's defamatory		
statements against me and my		
work which are designed as ad		
hominem attacks to shame me		
personally and to discredit me		
professionally as part-and-		
parcel of Wilson's campaign		
of harassment."		
4. Paragraph 8, Page 2:9-	Irrelevant (Cal. Evid. Code	Sustained:
10.	Sections 210, et seq., 350-	Overruled:
"As a result of Wilson's	351); lack of foundation (Cal.	
actions, my business	Evid. Code Sections 402, 403);	
	3	

Portion of Declaration Objected To	Grounds for Objection	Ruling on the Objection
relationships have been	speculation (Cal. Evid. Code	ASSESSMENT THE PROPERTY OF THE
harmed and I, personally, have	Section 702(a)); inadmissible	
become a target of abuse from	conclusory statements (Cal.	
proponents of Wilson's	Evid. Code sections 800 –	
activist/religious group."	803).	
5. Paragraph 8, Page	Irrelevant (Cal. Evid. Code	Sustained:
2:10-13.	Sections 210, et seq., 350-	Overruled:
"I believe I have lost three jobs	351); lack of foundation (Cal.	
due to Wilson's interference	Evid. Code Sections 402, 403);	
with four of my employers and	inadmissible conclusory	
I fear that the situation has	statements (Cal. Evid. Code	
been escalating such that there	sections 800 – 803);	
is an immediate and ongoing	speculation (Cal. Evid. Code	
threat of physical attack	Section 702(a)).	
against me and against those		
with whom I associate."		
6. Paragraph 9, Page	Irrelevant (Cal. Evid. Code	Sustained:
2:14-15.	Sections 210, et seq., 350-	Overruled:
"Specifically, Wilson's	351); lack of foundation (Cal.	
campaign of harassment	Evid. Code Sections 402, 403);	
departs drastically from simply	improper legal conclusion	
exchanging ideas and engaging	(Cal. Evid. Code Section 310);	
in debate."	inadmissible conclusory	
	statements (Cal. Evid. Code	
	Sections 800-803)	

Portion of Declaration	Grounds for Objection	Ruling on the Objection
Objected To		
7. Paragraph 9,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 1, Page 2:16-17.	Sections 210, et seq., 350-	Overruled:
"Wilson has contacted my	351); hearsay (Cal. Evid. Code	
employers attempting to	Sections 1200 et seq.); lack of	
convince them I have mental	foundation (Cal. Evid. Code	
disorder [sic] and that they	Sections 402, 403);	
should fire me."	speculation (Cal. Evid. Code	
	Section 702(a)); conclusory	
	statements (Cal. Evid. Code	
	Sections 800-803).	
8. Paragraph 9,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 2, Page 2:18-19.	Sections 210, et seq., 350-	Overruled:
"Wilson has made false	351); lack of foundation (Cal.	
statements against me	Evid. Code Sections 402, 403);	
designed to harm my	speculation (Cal. Evid. Code	
credibility as a research	Section 702(a)); inadmissible	
scientist."	conclusory statements (Cal.	
	Evid. Code sections 800 –	
	803); improper legal	
	conclusion (Cal. Evid. Code	
	Section 310); hearsay (Cal.	
	Evid. Code Sections 1200, et	
	seq.).	
9. Paragraph 9,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 3, Page 2:20-21.	Sections 210, et seq., 350-	Overruled:
"Wilson has made false	351); hearsay (Cal. Evid. Code	

Portion of Declaration	Grounds for Objection	Ruling on the Objection
Objected To		
statements against me	Sections 1200 et seq.); lack of	
designed to discredit me as a	foundation (Cal. Evid. Code	
licensed psychologist."	Sections 402, 403);	
	speculation (Cal. Evid. Code	
	Section 702(a)); inadmissible	
	conclusory statements (Cal.	
	Evid. Code sections 800 –	
	803); improper legal	
	conclusion (Cal. Evid. Code	
	Section 310).	
10. Paragraph 9,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 4, Page 2:22-23.	Sections 210, et seq., 350-	Overruled:
"Wilson has publicly sought to	351); hearsay (Cal. Evid. Code	
discredit me by claiming I am	Sections 1200 et seq.); lack of	
a "pervert" and "child	foundation (Cal. Evid. Code	
molester" and am conducting	Sections 402, 403);	
studies on subjects without	speculation (Cal. Evid. Code	
their full-informed consent."	Section 702(a)); inadmissible	
	conclusory statements (Cal.	
	Evid. Code sections 800 –	
	803).	
11. Paragraph 9,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 5, Page 2:24-25.	Sections 210, et seq., 350-	Overruled:
"Wilson has publicly sought to	351); hearsay (Cal. Evid. Code	
discredit me by claiming I	Sections 1200 et seq.); lack of	
have been convicted of	foundation (Cal. Evid. Code	

Portion of Declaration	Grounds for Objection	Ruling on the Objection
Objected To	Sections 402, 403);	
crimes."	speculation (Cal. Evid. Code	
	Section 702(a)); inadmissible	
	conclusory statements (Cal.	
	Evid. Code sections 800 –	
	803).	~
12. Paragraph 10, Pages	Irrelevant (Cal. Evid. Code	Sustained:
2:27 through Page 3:1.	Sections 210, et seq., 350-	Overruled:
"All of the categories of	351); hearsay (Cal. Evid. Code	
communications stated in	Sections 1200 et seq.); lack of	
Paragraph 9 devolved into	foundation (Cal. Evid. Code	
Wilson insinuating threats	Sections 402, 403);	
against me and my work	speculation (Cal. Evid. Code	
places, directly, and also an	Section 702(a)); inadmissible	
insinuated "call to arms" for	conclusory statements (Cal.	
like-minded people to harass	Evid. Code sections 800 –	
me by disseminating the	803); improper legal	
locations of my home and my	conclusion (Cal. Evid. Code	
work areas"	Section 310).	
13. Paragraph 10, Page	Irrelevant (Cal. Evid. Code	Sustained:
3:1-2.	Sections 210, et seq., 350-	Overruled:
"Wilson has directly contacted	351); hearsay (Cal. Evid. Code	
my employers, colleagues, and	Sections 1200 et seq.); lack of	
grant partners seeking to have	foundation (Cal. Evid. Code	
them sever ties with me."	Sections 402, 403);	
	speculation (Cal. Evid. Code	

Portion of Declaration Objected To	Grounds for Objection	Ruling on the Objection
	Section 702(a)); conclusory	
,	statements (Cal. Evid. Code	
	Sections 800-803).	
14. Paragraph 10, Page	Irrelevant (Cal. Evid. Code	Sustained:
3:2-3.	Sections 210, et seq., 350-	Overruled:
"In sum, as expressed on his	351); lack of foundation (Cal.	
website, Wilson's actions are	Evid. Code Sections 402, 403);	
based on his religious beliefs	speculation (Cal. Evid. Code	
that demand eradication of	Section 702(a)); inadmissible	
pornography."	conclusory statements (Cal.	
	Evid. Code sections 800 –	
	803).	
15. Paragraph 10, Page	Irrelevant (Cal. Evid. Code	Sustained:
3:3-5.	Sections 210, et seq., 350-	Overruled:
"So, as demonstrated herein,	351); lack of foundation (Cal.	
Wilson has taken extreme	Evid. Code Sections 402, 403);	
measures against me	speculation (Cal. Evid. Code	
personally and professionally	Section 702(a)); inadmissible	
which have resulted in me	conclusory statements (Cal.	
forming the apprehension that	Evid. Code sections 800 –	
Wilson poses a credible threat	803).	
of violence."		
16. Paragraph 11, Page	Irrelevant (Cal. Evid. Code	Sustained:
3:6-8.	Sections 210, et seq., 350-	Overruled:
"Attached hereto as Exhibit	351); hearsay (Cal. Evid. Code	
'A' is a compendium of letters	Sections 1200 et seq.); lack of	

Portion of Declaration	Grounds for Objection	Ruling on the Objection
Objected To		
from colleagues who have	foundation/lack of	X.
first-hand knowledge of	authentication (Cal. Evid.	
Wilson's actions. Some of the	Code Sections 402, 403,	
authors also have felt harassed	1400); speculation (Cal. Evid.	
by, and have developed fear	Code Section 702(a));	
of, Wilson."	improper legal conclusion	
	(Cal. Evid. Code Section 310);	
	inadmissible opinion (Cal.	
	Evid. Code Section 800).	
17. Paragraph 11, Page	Irrelevant (Cal. Evid. Code	Sustained:
3:8-10.	Sections 210, et seq., 350-	Overruled:
"These letters are not offered	351); hearsay (Cal. Evid. Code	
to prove the contents within,	Sections 1200 et seq.); lack of	
rather, they provide	foundation/lack of	
straightforward statements	authentication (Cal. Evid.	
allowing one to readily	Code Sections 402, 403,	
ascertain that Wilson is not	1400); speculation (Cal. Evid.	
simply engaging in debate or	Code Section 702(a));	
an exchange of ideas — his	inadmissible conclusory	
actions are more akin to a	statements (Cal. Evid. Code	
crusade."	sections 800 – 803);	
	inadmissible opinion Cal.	
	Evid. Code Section 800).	
18. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 1, Page 3:12-14.	Sections 210, et seq., 350-	Overruled:
"Erick Janssen, PhD.:	351); hearsay (Cal. Evid. Code	

Portion of Declaration Objected To	Grounds for Objection	Ruling on the Objection
Summary of Prause's standing	Sections 1200 et seq.); lack of	
in the field of sexual science	foundation/lack of	
and his concerns that Wilson's	authentication (Cal. Evid.	
actions interfere with scientific	Code Sections 402, 403,	
discourse because his threats	1400); speculation (Cal. Evid.	
put scientists (such as Prause)	Code Section 702(a));	
in fear for their personal	documents speak for	
safety."	themselves (Cal. Evid. Code	
•	Section 1523); inadmissible	
	opinion (Cal. Evid. Code	
	Section 800).	
19. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 2, Page 3:15-17.	Sections 210, et seq., 350-	Overruled:
"Dr. Roger Libby: Wilson	351); hearsay (Cal. Evid. Code	
constantly defames Prause and	Sections 1200 et seq.); lack of	1
harasses her. Dr. Libby	foundation/lack of	
believes Wilson exhibits	authentication (Cal. Evid.	
behaviors of an 'out of control	Code Sections 402, 403,	
stalker' and he negatively	1400); speculation (Cal. Evid.	
impacts Dr. Prause's ability to	Code Section 702(a));	
work and function out of	improper opinion testimony of	
reasonable fear for her safety."	a lay witness (Cal. Evid. Code	
	Section 800); documents speak	
	for themselves (Cal. Evid.	
	Code Section 1523);	
	inadmissible conclusory	

Portion of Declaration	Grounds for Objection	Ruling on the Objection
Objected To		
	statements (Cal. Evid. Code	
	sections 800 – 803); improper	
	legal conclusion (Cal. Evid.	
	Code Section 310).	
20. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 3, Page 3:18-21.	Sections 210, et seq., 350-	Overruled:
"James G. Pfaus, PhD: Wilson	351); hearsay (Cal. Evid. Code	
has accused Prause of sexually	Sections 1200 et seq.); lack of	
molesting children. Wilson	foundation/lack of	
also posts hundreds of pictures	authentication (Cal. Evid.	
of Prause on his website and	Code Sections 402, 403,	
"now has pages devoted to	1400); speculation (Cal. Evid.	
discussing Dr. Prause's	Code Section 702(a));	·
physical location and had	documents speak for	
travelled to Germany to	themselves (Cal. Evid. Code	
confront Prause."	Section 1523).	,
21. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 4, Page 3:22-24.	Sections 210, et seq., 350-	Overruled:
"Taylor Kohut, PhD: Wilson	351); hearsay (Cal. Evid. Code	
cannot simply ignored and	Sections 1200 et seq.); lack of	
dismissed because his actions	foundation/lack of	
are intentionally harmful and	authentication (Cal. Evid.	
he poses a safety threat. Kohut	Code Sections 402, 403,	
also summarizes, an ongoing	1400); speculation (Cal. Evid.	
defamatory campaign by	Code Section 702(a));	
Wilson accusing Prause of	improper opinion testimony of	

Portion of Declaration	Grounds for Objection	Ruling on the Objection
Objected To		
being a 'pedophile.'"	a lay witness (Cal. Evid. Code	
	Section 800); documents speak	
	for themselves (Cal. Evid.	*
	Code Section 1523);	
	inadmissible conclusory	
	statements (Cal. Evid. Code	
	sections 800 – 803); improper	
	legal conclusion (Cal. Evid.	
	Code Section 310).	,
22. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 5, Page 3:25-27.	Sections 210, et seq., 350-	Overruled:
"I have been sent seven other	351); hearsay (Cal. Evid. Code	
letters from colleagues and	Sections 1200 et seq.); lack of	
scientists relating their direct	foundation/lack of	
experiences with the matter at	authentication (Cal. Evid.	
issue in my Petition. However,	Code Sections 402, 403,	
for the sake of brevity I have	1400); inadmissible	
omitted them as the facts are	conclusory statements (Cal.	
similar to the four example	Evid. Code sections 800 –	
letters in Exhibit 'A.'"	803).	
23. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 6, Page 4:1-5.	Sections 210, et seq., 350-	Overruled:
"In addition to escalating his	351); hearsay (Cal. Evid. Code	
hostile and defamatory rhetoric	Sections 1200 et seq.); lack of	
against me, Wilson, travelled	foundation (Cal. Evid. Code	
to Germany to appear at a	Sections 402, 403);	

Portion of Declaration	Grounds for Objection	Ruling on the Objection
Objected To conference where I was a	speculation (Cal. Evid. Code	
scheduled speaker. I did not	Section 702(a)); improper	
have any physical contact with	opinion testimony of a lay	
Wilson at that time, but his	witness (Cal. Evid. Code	
	Section 800); improper legal	
action of attending this	conclusion (Cal. Evid. Code	
conference, although uninvited	`	
and not otherwise credentialed,	Section 310); conclusory	
served to send me a message	statements (Cal. Evid. Code	
that he was willing and able to	Sections 800-803).	
make good on his threats."		G 1
24. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 7, Page 4:6-8.	Sections 210, et seq., 350-	Overruled:
"As a result of Gary Wilson's	351); lack of foundation (Cal.	
actions, I have relocated many	Evid. Code Sections 402, 403);	
times and have had issues	speculation (Cal. Evid. Code	
maintaining my research and	Section 702(a)); conclusory	
my job due to my fear of	statements (Cal. Evid. Code	
Wilson and/or supporters of	Sections 800-803).	
Wilson who may feel		
compelled to confront me		
physically based on Wilson's		
statements."		
25. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 8, Page 4:9-11.	Sections 210, et seq., 350-	Overruled:
"In or about March 2016, in	351); speculation (Cal. Evid.	
Los Angeles I believed that I	Code Section 702(a)); lack of	

Portion of Declaration	Grounds for Objection	Ruling on the Objection
Objected To saw a man surveilling my	foundation Cal. Evid. Code	
office. I was not able to	Sections 402, 403).	
identify him as Wilson, nor	,	
was I able to firmly state this	÷	
person was doing anything		
nefarious."		
26. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 8, Page 4:11-14.	Sections 210, et seq., 350-	Overruled:
"However, the episode	351); improper legal	
demonstrated to me that I held	conclusion (Cal. Evid. Code	
extreme fear of Wilson and	Section 310); speculation Cal.	
then held (and now hold) the	Evid. Code Section 702(a));	
belief that I could be	lack of foundation (Cal. Evid.	
physically accosted at anytime	Code Sections 402, 403);	
and anywhere whether it be at	conclusory statements (Cal.	
a conference in Europe, at my	Evid. Code Sections 800-803).	
place of work or at my home."		
27. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 9, Page 4:15-19.	Sections 210, et seq., 350-	Overruled:
"Given several incidents where	351); improper legal	
I have suspected being	conclusion (Cal. Evid. Code	
surveilled and Wilson's	Section 310); speculation Cal.	
physical appearance in	Evid. Code Section 702(a));	
Germany combined with	lack of foundation (Cal. Evid.	
Wilson's escalating rhetoric	Code Sections 402, 403);	
towards me and my work, I am	conclusory statements (Cal.	

Portion of Declaration	Grounds for Objection	Ruling on the Objection
Objected To		
in fear that I may be physically	Evid. Code Sections 800-803).	
assaulted by Wilson or	,	
someone acting on his behalf."		
28. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 10, Page 4:22-	Sections 210, et seq., 350-	Overruled:
24.	351); lack of foundation (Cal.	
"I also seek incidental orders	Evid. Code Sections 402, 403);	
to have Wilson remove hostile	inadmissible conclusory	
items towards me from his	statements (Cal. Evid. Code	
website — as such are means	sections 800 – 803); improper	
of indirect harassment and	legal conclusion (Cal. Evid.	
communication to me."	Code Section 310); Request	
	for Restraining Order speaks	
	for itself.	
29. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 11, Page 4:25-	Sections 210, et seq., 350-	Overruled:
28.	351); lack of foundation (Cal.	
"My restraining order is not	Evid. Code Sections 402, 403);	
seeking to infringe on	inadmissible conclusory	
Wilson's protected speech;	statements (Cal. Evid. Code	
rather, it is seeking restraint on	sections 800 – 803); improper	
his specific actions of	legal conclusion (Cal. Evid.	
contacting people associated	Code Section 310); Request	
with me and my work as such	for Restraining Order speaks	
body of actions have resulted	for itself.	
in ongoing harassment and		

Portion of Declaration	Grounds for Objection	Ruling on the Objection
	Organica for Onleanon	- J
Objected To		
interference with my personal		
and professional life."	T 1 (C1 D 11 C 1	Systemade
30. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 11, Page 4:28	Sections 210, et seq., 350-	Overruled:
through Page 5:3.	351); lack of foundation (Cal.	
"As to the content of Wilson's	Evid. Code Sections 402, 403);	
speech, I am only seeking to	inadmissible conclusory	
restrain his false statements	statements (Cal. Evid. Code	
regarding me and my research	sections 800 – 803); improper	
which have gone well beyond	legal conclusion (Cal. Evid.	
those of someone seeking an	Code Section 310); Request	
intellectual pursuit, but rather	for Restraining Order speaks	
towards seeking to identify me	for itself.	
as a "target" working at odds		
with the beliefs of Wilson and		
those within his group."		
31. Paragraph 11,	Irrelevant (Cal. Evid. Code	
Subparagraph 12, Page 5:4-7.	Sections 210, et seq., 350-	
"In order to provide proper	351); lack of foundation (Cal.	
context to the communications	Evid. Code Sections 402, 403);	
aspect of the requested Order,	inadmissible conclusory	
which is simply incidental to	statements (Cal. Evid. Code	
the request to be protected	sections 800 – 803); improper	
against the threat of physical	legal conclusion (Cal. Evid.	
harm, it is necessary to provide	Code Section 310); Request	
the Court with a brief history	for Restraining Order speaks	

Portion of Declaration	Grounds for Objection	Ruling on the Objection
Objected To	0 1 10	
of Wilson's campaign against	for itself.	
me."		
32. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 13, Page 5:8-11.	Sections 210, et seq., 350-	Overruled:
"Wilson has repeatedly made	351); hearsay (Cal. Evid. Code	
false claims against me which	Sections 1200 et seq.); lack of	
not only harm me	foundation (Cal. Evid. Code	
professionally, but they tend to	Sections 402, 403);	
cast me as an "enemy" to	speculation (Cal. Evid. Code	
fringe groups that are receptive	Section 702(a)); improper	
to Wilson's beliefs thus	opinion testimony of a lay	
drastically increasing the	witness (Cal. Evid. Code	
likelihood of physical	Section 800); conclusory	
confrontation by Wilson or	statements (Cal. Evid. Code	
someone following Wilson's	Sections 800-803).	
words."		
33. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 13, Page 5:11-	Sections 210, et seq., 350-	Overruled:
12.	351); lack of foundation (Cal.	
"Based on my first-hand	Evid. Code Sections 402, 403);	
experience, I believe White	speculation (Cal. Evid. Code	
Supremacy groups are aligned	Section 702(a)); improper	
with Wilson."	opinion testimony of a lay	
	witness (Cal. Evid. Code	
	Section 800); inadmissible	
	conclusory statements (Cal.	

Portion of Declaration	Grounds for Objection	Ruling on the Objection
Objected To		
	Evid. Code sections 800 –	·
	803).	
34. Paragraph 13, Page	Irrelevant (Cal. Evid. Code	Sustained:
5:12-13.	Sections 210, et seq., 350-	Overruled:
"Attached hereto as Exhibit	351); hearsay (Cal. Evid. Code	
'B' are true and correct copies	Sections 1200 et seq.); lack of	
of death threats which were	foundation/lack of	·
directed at me."	authentication (Cal. Evid.	
	Code Sections 402, 403,	
	1400); speculation (Cal. Evid.	
	Code Section 702(a));	
	documents speak for	
	themselves (Cal. Evid. Code	
	Section 1523).	
35. Paragraph 13,	Irrelevant (Cal. Evid. Code	
Subparagraph 13, Page 5:13-	Sections 210, et seq., 350-	
15.	351); lack of foundation/lack	
My belief that these groups	of authentication (Cal. Evid.	
have been directly encouraged	Code Sections 402, 403,	
by Wilson or at least had me	1400); speculation (Cal. Evid.	
identified as a target by Wilson	Code Section 702(a)).	
is based on the fact that other		
than in my immediate field of		
study, I am not a widely-		
recognized academic."		

Portion of Declaration	Grounds for Objection	Ruling on the Objection
Objected To		
36. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 13, Page 5:15-	Sections 210, et seq., 350-	Overruled:
19.	351); hearsay (Cal. Evid. Code	
"I did not start receiving any	Sections 1200 et seq.); lack of	
attention for people outside of	foundation (Cal. Evid. Code	
my field until Wilson engaged	Sections 402, 403);	
me as an enemy and Wilson	inadmissible conclusory	
has repeatedly posted my work	statements (Cal. Evid. Code	
and home addresses along with	sections $800 - 803$).	
numerous photographs of me.		
Accordingly, should anyone		
wish to direct a threat towards		
me, whether on the internet or		
in person, the information has		
been given to them."		
37. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 14, Page 5:20-	Sections 210, et seq., 350-	Overruled:
25.	351); hearsay (Cal. Evid. Code	
"The following statements of	Sections 1200 et seq.); lack of	
Wilson are collected from two	foundation/lack of	
main sources — direct letters	authentication (Cal. Evid.	1
by Wilson and public	Code Sections 402, 403,	
statements posted to the	1400); speculation (Cal. Evid.	
internet. Through my years of	Code Section 702(a));	
experience of engaging in	documents speak for	
discussions of my academic	themselves (Cal. Evid. Code	

Portion of Declaration Objected To	Grounds for Objection	Ruling on the Objection
studies and other related topics	Section 1523).	
on the internet, I have first-		
hand experience with		
interacting with Wilson. Each		
offered posting is, to the best		
of my knowledge gathered		
over a number of years and		
hundreds (if not thousands of		
hours) of interactions) [sic] is		
by Wilson."		
38. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 15, Page 5:26-	Sections 210, et seq., 350-	Overruled:
28.	351); hearsay (Cal. Evid. Code	
"False Claim: 'Please know	Sections 1200 et seq.); lack of	
that Dr. Prause has been under	foundation/lack of	
investigation by the California	authentication (Cal. Evid.	
Board of Psychology for more	Code Sections 402, 403,	
than 2 years for her harassment	1400); speculation (Cal. Evid.	
of others' Stated on	Code Section 702(a));	
https://www.YourBrainOnPor	documents speak for	
n.com (henceforth "YBOP")."	themselves (Cal. Evid. Code	
	Section 1523); improper legal	
	conclusion (Cal. Evid. Code	
	Section 310).	

Portion of Declaration Objected To	Grounds for Objection	Ruling on the Objection
39. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 15,	Sections 210, et seq., 350-	Overruled:
Subparagraph (1), Page 6:2-4.	351); hearsay (Cal. Evid. Code	
"'Dr. Prause is currently under	Sections 1200 et seq.); lack of	
investigation by the California	foundation/lack of	
Psychology Board [T]he	authentication (Cal. Evid.	
tweets on my pages are	Code Sections 402, 403,	
evidence that was provided to	1400); documents speak for	
the California Psychology	themselves (Cal. Evid. Code	
Board, and thus part of an	Section 1523).	
ongoing investigation into Dr.		
Prause's behavior.'"		
40. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 15,	Sections 210, et seq., 350-	Overruled:
Subparagraph (2), Page 6:5-6.	351); hearsay (Cal. Evid. Code	
"'It is my understanding (as I	Sections 1200 et seq.); lack of	
have been asked to testify) that	foundation/lack of	
the California investigation of	authentication (Cal. Evid.	
Dr. Prause is in full swing'	Code Sections 402, 403,	
Posted by Gary Wilson on	1400); documents speak for	
June 14, 2018."	themselves (Cal. Evid. Code	
	Section 1523).	
41. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 15,	Sections 210, et seq., 350-	Overruled:
Subparagraph (3), Page 6:7-8.	351); hearsay (Cal. Evid. Code	
"'Did you know that Pause	Sections 1200 et seq.); lack of	

		Duling on the Objection
Portion of Declaration Objected To	Grounds for Objection	Ruling on the Objection
(sic) has publicly admitted to	foundation/lack of	
being under investigation by	authentication (Cal. Evid.	
the California psychology	Code Sections 402, 403,	
board? This is no joke."	1400); documents speak for	
board: This is no joke.	themselves (Cal. Evid. Code	
	Section 1523).	
42 Days growth 11	Irrelevant (Cal. Evid. Code	Sustained:
42. Paragraph 11,	Sections 210, et seq., 350-	Overruled:
Subparagraph 15,	-	Oventuled:
Subparagraph (4), Page 6:9-11.	351); hearsay (Cal. Evid. Code	
"Be wary of the 'porn	Sections 1200 et seq.); lack of	
professors' who have ties to	foundation/lack of	
the porn industry, are under	authentication (Cal. Evid.	
scrutiny for lack of ethics and	Code Sections 402, 403,	
harassment [links to	1400); documents speak for	
www.yourbrainonpom.com	themselves (Cal. Evid. Code	
accusations in license	Section 1523.	
complaint]"		
43. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 15, Page 6:12-	Sections 210, et seq., 350-	Overruled:
16.	351); hearsay (Cal. Evid. Code	
"Truth: Gary Wilson himself	Sections 1200 et seq.); lack of	
filed the complaint which was	foundation/lack of	
determined to be unfounded by	authentication (Cal. Evid.	
the Board. During this 3-year	Code Sections 402, 403,	
process, I was unable to	1400); speculation (Cal. Evid.	
practice using my California	Code Section 702(a));	

Portion of Declaration Objected To	Grounds for Objection	Ruling on the Objection
Psychology license until the	documents speak for	
matter was closed. Attached	themselves (Cal. Evid. Code	
hereto as Exhibit "C", is a true	Section 1523).	
and correct copy of the		
California Board of		
Psychology's letter dated		
October 11, 2019 closing the		
case with no negative findings		
initiated by 'Kevin Gerry'".		
44. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 15, Page 6:17-	Sections 210, et seq., 350-	Overruled:
20.	351); lack of foundation (Cal.	
"Harm: I am a licensed	Evid. Code Sections 402, 403);	· ·
psychologist in California; the	Improper legal conclusion	
attack against me not only	(Cal. Evid. Code Section 310);	
prevented me from practicing	speculation (Cal. Evid. Code	
pending the investigation	Section 702(a)).	
initiated by Wilson himself, it		
harmed (and continues to		
harm) my ability to attract		
psychology patients and also		
discredits me to those seeking		
to hire me for research."		

Portion of Declaration	Grounds for Objection	Ruling on the Objection
Objected To		
45. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 16, Page 6:21-	Sections 210, et seq., 350-	Overruled:
24.	351); hearsay (Cal. Evid. Code	
"False Claim: 'This thread	Sections 1200 et seq.); lack of	
exposes much about Prause	foundation/lack of	
shady and sometimes illegal	authentication (Cal. Evid.	
activities (perjury, defamation,	Code Sections 402, 403,	
false police reports, lying	1400); documents speak for	
about FBI reports, false reports	themselves (Cal. Evid. Code	
to governing bodies). She is	Section 1523.	
also being sued for defamation		
by 2 parties.' Attached hereto		
as Exhibit "D" are true and		
correct printouts of Wilson's		
statements taken from his		
website."		
46. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 16, Page 6:25-	Sections 210, et seq., 350-	Overruled:
26.	351); inadmissible conclusory	
"Truth: I have never been	statements (Cal. Evid. Code	
named as a suspect the crimes	sections 800 – 803); improper	
cited by Wilson, much less	legal conclusion (Cal. Evid.	
been convicted of any 'illegal	Code Section 310); lack of	
activities."	foundation (Cal. Evid. Code	
	Sections 402-403).	

	Crown do for Objection	Ruling on the Objection
Portion of Declaration Objected To	Grounds for Objection	Rums on the objection
47. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 16, Page 7:1-3.	Sections 210, et seq., 350-	Overruled:
"Harm: I am a licensed	351); lack of foundation (Cal.	
psychologist in California; the	Evid. Code Sections 402, 403);	
attack against me harms my	speculation (Cal. Evid. Code	
ability to attract psychology	Section 702(a)).	
patients and also discredits me		
to those seeking to hire me for		
research.		
48. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 17, Page 7:4-6.	Sections 210, et seq., 350-	Overruled:
"Harmful communication:	351); lack of foundation/lack	
Wilson publicly posted the	of authentication (Cal. Evid.	
location of a laboratory	Code Sections 402, 403,	
collaboration with the	1400); speculation (Cal. Evid.	
University of Pittsburgh,	Code Section 702(a)).	
School of Medicine, and me. I		
conducted paid research under		
contract at this facility and		
lived on-site during work		
times."		
49. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 17, Page 7:7-13.	Sections 210, et seq., 350-	Overruled:
"Threat: The posting of this	351); lack of foundation/lack	
location at which studies on	of authentication (Cal. Evid.	
several academic subjects,	Code Sections 402, 403,	

Portion of Declaration	Grounds for Objection	Ruling on the Objection
Objected To		
including pornography, are	1400); speculation (Cal. Evid.	
conducted which is also a	Code Section 702(a); improper	
facility at which I lived is an	opinion testimony of a lay	
implied 'call to arms.' In my	witness (Cal. Evid. Code	
experience and within my	Section 800); improper legal	
knowledge of a licensed	conclusion (Cal. Evid. Code	
psychologist, extremist groups	Section 310); speculation (Cal.	
tend to develop a 'hive	Evid. Code Section 702(a)).	
mentality' which promotes		
escalation of actions against		
the 'target.' In this case, a		
natural escalation combined		
with a prominent group		
member posting the address of		
a specific laboratory, would be		
an attack against the facility —		
not unlike such experienced by		
Planned Parenthood locations		
throughout the country."		
50. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 17, Page 7:14-	Sections 210, et seq., 350-	Overruled:
16.	351); hearsay (Cal. Evid. Code	
"Harm: The laboratory could	Sections 1200 et seq.); lack of	
not relocate or increase	foundation (Cal. Evid. Code	
security sufficiently to address	Sections 402, 403);	
the threats of Gary Wilson. As	speculation (Cal. Evid. Code	

Portion of Declaration	Grounds for Objection	Ruling on the Objection
Objected To		
for me, such actions create an	Section 702(a); inadmissible	
appreciation of increased	conclusory statements (Cal.	
danger, and I ended plans to	Evid. Code sections 800 –	
conduct studies at the location	803);	
out of fear of heightened safety		
threat."		
51. Paragraph 11,	Irrelevant (Cal. Evid. Code	
Subparagraph 17, Page 7:17-	Sections 210, et seq., 350-	
18.	351); hearsay (Cal. Evid. Code	
Attached hereto as Exhibit "E"	Sections 1200 et seq.); lack of	
is a true and correct letter from	foundation/lack of	
Dr. Siegel of the University of	authentication (Cal. Evid.	
Pittsburgh addressing the	Code Sections 402, 403,	
issues posed by Wilson	1400); speculation (Cal. Evid.	
publicly disclosing this	Code Section 702(a));	
location."	documents speak for	
	themselves (Cal. Evid. Code	
	Section 1523).	
52. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 18, Page 7:19-	Sections 210, et seq., 350-	Overruled:
20.	351); hearsay (Cal. Evid. Code	
"False Claim: '[I]t was Prause	Sections 1200 et seq.); lack of	
and Ley who first badgered	foundation/lack of	
Alex about his penis. THEY	authentication (Cal. Evid.	
brought up his penis to harass	Code Sections 402, 403,	

Portion of Declaration	Grounds for Objection	Ruling on the Objection
Objected To him about his genitals and	1400); documents speak for	
sexual history."	themselves (Cal. Evid. Code	
Sexual History.	Section 1523);	
53. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 18,	Sections 210, et seq., 350-	Overruled:
Subparagraph (1), Page 7:22-	351); hearsay (Cal. Evid. Code	
23.	Sections 1200 et seq.); lack of	
"'Prause is certainly being	foundation/lack of	
sexist when she demands	authentication (Cal. Evid.	
details about the size of my	Code Sections 402, 403,	
penis.'"	1400); documents speak for	
	themselves (Cal. Evid. Code	
	Section 1523);	
54. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 18,	Sections 210, et seq., 350-	Overruled:
Subparagraph (2), Page 7:24.	351); hearsay (Cal. Evid. Code	
"That I asked 'How small IS	Sections 1200 et seq.); lack of	
your penis Gary?'"	foundation/lack of	
	authentication (Cal. Evid.	
	Code Sections 402, 403,	
	1400); documents speak for	
	themselves (Cal. Evid. Code	
	Section 1523);	
55. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 18,	Sections 210, et seq., 350-	Overruled:
Subparagraph (3), Page 7:25-	351); hearsay (Cal. Evid. Code	

Portion of Declaration Objected To	Grounds for Objection	Ruling on the Objection
26.	Sections 1200 et seq.); lack of	33,400,000,000
"She turned my inadvertent	foundation/lack of	
'Miss' into me being a	authentication (Cal. Evid.	
misogynist (while she asked	Code Sections 402, 403,	
me about my penis)"	1400); documents speak for	
	themselves (Cal. Evid. Code	
	Section 1523);	
56. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 18,	Sections 210, et seq., 350-	Overruled:
Subparagraph (4), Page 7:27-	351); hearsay (Cal. Evid. Code	
28.	Sections 1200 et seq.); lack of	
""[Prause] [sic] even posted on	foundation/lack of	
@BrainRebalanced - asking	authentication (Cal. Evid.	
me about the size of my	Code Sections 402, 403,	
penis!""	1400); documents speak for	
	themselves (Cal. Evid. Code	
	Section 1523);	
57. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 18,	Sections 210, et seq., 350-	Overruled:
Subparagraph (5), Page 8:1-4.	351); hearsay (Cal. Evid. Code	
""We are not sure, but the	Sections 1200 et seq.); lack of	
clitoris diddling study (OM)	foundation/lack of	
may have hit a predictable	authentication (Cal. Evid.	
snag: the challenge of finding	Code Sections 402, 403,	
female subjects who want their	1400); documents speak for	
genitals rubbed while being	themselves (Cal. Evid. Code	

Portion of Declaration Objected To	Grounds for Objection	Ruling on the Objection
hooked up to machines and	Section 1523);	
monitored by researchers. To		
reach her target of 250 OM		
couples, it appears that Prause		
may have obtained porn		
performers as subjects"		
58. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 18,	Sections 210, et seq., 350-	Overruled:
Subparagraph (5), Page 8:6-7.	351); inadmissible conclusory	
"Truth: I have not engaged in	statements (Cal. Evid. Code	
any such discussion nor have I	sections $800 - 803$);	
asked any of the questions		
attributed to me."		
59. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 18,	Sections 210, et seq., 350-	Overruled:
Subparagraph (5), Page 8:8-11.	351); hearsay (Cal. Evid. Code	
"Harm: I am a licensed	Sections 1200 et seq.); lack of	
psychologist in California; the	foundation (Cal. Evid. Code	
attack against me harms my	Sections 402, 403);	
ability to attract psychology	speculation (Cal. Evid. Code	
patients and also discredits me	Section 702(a)); inadmissible	
to those seeking to hire me for	conclusory statements (Cal.	
research. The claim that I	Evid. Code sections 800 –	
engage in such conduct to	803);	
trivialize the importance of my		
field of research [sic] casts me	30	

Portion of Declaration Objected To	Grounds for Objection	Ruling on the Objection
as unprofessional.		
60. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 19, Page 8:12-	Sections 210, et seq., 350-	Overruled:
13.	351); hearsay (Cal. Evid. Code	
"False Claim: 'Prause joined	Sections 1200 et seq.); lack of	
the FSC in a war against Prop	foundation/lack of	
60 (condoms in porn)."	authentication (Cal. Evid.	
	Code Sections 402, 403,	
	1400); documents speak for	 -
	themselves (Cal. Evid. Code	
	Section 1523);	
61. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 19, Page 8:15-	Sections 210, et seq., 350-	Overruled:
17.	351); inadmissible conclusory	
"Truth: I have not participated	statements (Cal. Evid. Code	
in any lobbying against	sections 800 – 803);	
condoms in pornography,	speculation (Cal. Evid. Code	
especially since such is already	Section 702(a)).	
regulated by the California		
Occupational Safety and		
Health Administration."		
62. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 19, Page 8:18-	Sections 210, et seq., 350-	Overruled:
21.	351); hearsay (Cal. Evid. Code	
"Harm: This claim serves to	Sections 1200 et seq.); lack of	
discredit me as a scientist as it	foundation (Cal. Evid. Code	

Grounds for Objection	Ruling on the Objection
Sections 402, 403);	
speculation (Cal. Evid. Code	
Section 702(a)); inadmissible	
conclusory statements (Cal.	
Evid. Code sections 800 –	
803).	
Irrelevant (Cal. Evid. Code	Sustained:
Sections 210, et seq., 350-	Overruled:
351); hearsay (Cal. Evid. Code	
Sections 1200 et seq.); lack of	
foundation/lack of	
authentication (Cal. Evid.	
Code Sections 402, 403,	
1400); documents speak for	
themselves (Cal. Evid. Code	
Section 1523).	
/	
Irrelevant (Cal. Evid. Code	Sustained:
Sections 210, et seq., 350-	Overruled:
351); hearsay (Cal. Evid. Code	
Sections 1200 et seq.); lack of	
foundation/lack of	
authentication (Cal. Evid.	
	Sections 402, 403); speculation (Cal. Evid. Code Section 702(a)); inadmissible conclusory statements (Cal. Evid. Code sections 800 – 803). Irrelevant (Cal. Evid. Code Sections 210, et seq., 350- 351); hearsay (Cal. Evid. Code Sections 1200 et seq.); lack of foundation/lack of authentication (Cal. Evid. Code Sections 402, 403, 1400); documents speak for themselves (Cal. Evid. Code Section 1523). Irrelevant (Cal. Evid. Code Sections 210, et seq., 350- 351); hearsay (Cal. Evid. Code Sections 1200 et seq.); lack of foundation/lack of

Portion of Declaration Objected To	Grounds for Objection	Ruling on the Objection
7 · · · · · · · · · · · · · · · · · · ·	Code Sections 402, 403,	
	1400); documents speak for	
	themselves (Cal. Evid. Code	
	Section 1523).	
65. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 20,	Sections 210, et seq., 350-	Overruled:
Subparagraph (2), Page 9:1-2.	351); hearsay (Cal. Evid. Code	
"Prause is either lying about	Sections 1200 et seq.); lack of	
her many reports or the law	foundation/lack of	
enforcement agencies think	authentication (Cal. Evid.	
she is a lunatic."	Code Sections 402, 403,	
	1400); documents speak for	
	themselves (Cal. Evid. Code	
	Section 1523).	,
66. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 20,	Sections 210, et seq., 350-	Overruled:
Subparagraph (3), Page 9:3.	351); hearsay (Cal. Evid. Code	
"When you are a pathological	Sections 1200 et seq.); lack of	
liar, you can apparently lie	foundation/lack of	
about anything"	authentication (Cal. Evid.	
	Code Sections 402, 403,	
	1400); documents speak for	
	themselves (Cal. Evid. Code	
	Section 1523).	

Portion of Declaration	Grounds for Objection	Ruling on the Objection
Objected To		
67. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 20,	Sections 210, et seq., 350-	Overruled:
Subparagraph (4), Page 9:4.	351); hearsay (Cal. Evid. Code	
"More fake victim-hood from	Sections 1200 et seq.); lack of	
a pathological liar'"	foundation/lack of	
	authentication (Cal. Evid.	
	Code Sections 402, 403,	
	1400); documents speak for	
	themselves (Cal. Evid. Code	
	Section 1523).	
68. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 20,	Sections 210, et seq., 350-	Overruled:
Subparagraph (5), Page 9:5.	351); hearsay (Cal. Evid. Code	
"The sociopath claims to be	Sections 1200 et seq.); lack of	
'the victim'"	foundation/lack of	
	authentication (Cal. Evid.	
	Code Sections 402, 403,	
	1400); documents speak for	
	themselves (Cal. Evid. Code	
	Section 1523).	
69. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 20, Page 9:8-10.	Sections 210, et seq., 350-	Overruled:
"Truth: I have not ever been	351); hearsay (Cal. Evid. Code	
diagnosed with a mental	Sections 1200 et seq.);	
illness until recently when I	speculation (Cal. Evid. Code	
·	Section 702(a); improper	

Portion of Declaration	Grounds for Objection	Ruling on the Objection
Objected To		
manifestations of PTSD which	opinion testimony of a lay	
my therapist (and I) attribute to	witness (Cal. Evid. Code	
threats from Wilson."	Section 800).	
70. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 20, Page 9:11-	Sections 210, et seq., 350-	Overruled:
14.	351); hearsay (Cal. Evid. Code	
"Harm: This activity directed	Sections 1200 et seq.); lack of	
towards my employer was	foundation (Cal. Evid. Code	
designed to interrupt my	Sections 402, 403);	
relationship with UCLA and in	speculation (Cal. Evid. Code	
a general sense, the research	Section 702(a); inadmissible	
community as it would be true	conclusory statements (Cal.	
that should my relationship	Evid. Code sections 800 –	,
with an influential institution	803).	
such as UCLA be negatively		
affected, my reputation in the		
industry would be affected		
negatively as well.		
71. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 21, Page 9:15-	Sections 210, et seq., 350-	Overruled:
23.	351); hearsay (Cal. Evid. Code	
"I have relocated my home	Sections 1200 et seq.); lack of	
twice solely due to stalking by	foundation/lack of	
Gary Wilson. I moved my	authentication (Cal. Evid.	
home two other times due in	Code Sections 402, 403,	
part due to stalking by Gary	1400); speculation (Cal. Evid.	

Portion of Declaration	Grounds for Objection	Ruling on the Objection		
Objected To				
Wilson. I move my office	Code Section 702(a); improper			
regularly (about once per year)	opinion testimony of a lay			
as a policy to keep my staff	witness (Cal. Evid. Code			
and research participants safe	Section 800); documents speak			
due to Gary Wilson's stalking.	for themselves (Cal. Evid.			
I also employ a subcontract on	Code Section 1523);			
my office lease so that my	inadmissible conclusory			
name can never be connected	statements (Cal. Evid. Code			
to my office location to keep	Sections 800-803);			
my research participants safe	inadmissible legal conclusions			
from Gary Wilson. I have	(Cal. Evid. Code Section 310).			
decided to live apart from my				
family due to Gary Wilson's				
stalking, as my presence could				
expose the identity or address				
of a minor child. Attached				
hereto as Exhibit "J" are true				
and correct copies of receipts				
and other documents showing				
implementation of security				
measures I have undertaken in				
response to Wilson's actions."				
72. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:		
Subparagraph 22, Page 9:24	Sections 210, et seq., 350-	Overruled:		
through Page 10:2.	351); hearsay (Cal. Evid. Code			
"I have informed all my local	Sections 1200 et seq.); lack of			
36				

D. L ADvalouation	Grounds for Objection	Ruling on the Objection
Portion of Declaration	Grounds for Objection	Runng on the Objection
Objected To	foundation/lack of	
contacts that I cannot appear in	authentication (Cal. Evid.	
photographs that identify my	Code Sections 402, 403,	
regular location or family		
contacts. I remind them	1400); speculation (Cal. Evid.	
regularly and seek to remove	Code Section 702(a));	
photographs from social media	improper opinion testimony of	
that might endanger myself,	a lay witness (Cal. Evid. Code	
my friends or family. As a	Section 800); documents speak	
result, I am unable to assist	for themselves (Cal. Evid.	
groups in which I am a	Code Section 1523);	
member to recruit, fundraise,	conclusory statements (Cal.	
or otherwise publicize. I also	Evid. Code Sections 800-803).	
am unable to receive social		
support from family and		
friends, who are aware a		
stalking threat prevents me		
from fully participating in		
family and other recreational		
events."		
73. Paragraph 11,	Irrelevant (Cal. Evid. Code	Sustained:
Subparagraph 23, Page 10:3-	Sections 210, et seq., 350-	Overruled:
11.	351); hearsay (Cal. Evid. Code	
"Since the COVID-19 crisis	Sections 1200 et seq.); lack of	
has overtaken our country, my	foundation/lack of	
apprehension of imminent	authentication (Cal. Evid.	
harm has increased	Code Sections 402, 403,	
	37	

Portion of Declaration	Grounds for Objection	Ruling on the Objection
Objected To	Grounds for Objection	Adding on the Conjection
significantly as social unrest	1400); speculation (Cal. Evid.	
appears to be escalating	Code Section 702(a));	
throughout the country and it	improper opinion testimony of	
appears scientists and other	a lay witness (Cal. Evid. Code	
public officials have come	Section 800).	
under increased threat. I am		
only speaking from my own		
perception of what has been		
reported, but it appears		
numerous groups have felt		
"liberated" to turn vocal		
objection into physical		
demonstrations escalating to		
violence and harm to persons		
and property. As a scientist in		
a controversial field-of-study, I		
have been experiencing a		
steady escalation of aggressive		
rhetoric from those opposed to		
pornography — and based on		
the totality of circumstances, I		
believe Wilson presents a		
current threat of physical harm		
against me directly."		

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EVIDENTIARY OBJECTIONS TO EXHIBITS ATTACHED TO DECLARATION OF

NICOLE PRAUSE

3	Portion of Declaration	Grounds for Objection	Ruling on the Objection
4	Objected To		
5	74. Exhibit "A"	Irrelevant (Cal. Evid. Code	Sustained:
6		Sections 210, et seq., 350-	Overruled:
7		351); hearsay (Cal. Evid. Code	
8		Sections 1200 et seq. lack of	
9		foundation/lack of	
10		authentication (Cal. Evid.	
11		Code Sections 402, 403,	
12		1400); speculation (Cal. Evid.	
13		Code Section 702(a));	
14		inadmissible opinion (Cal.	
15		Evid. Code Section 800).	
16	75. Exhibit "B"	Irrelevant (Cal. Evid. Code	Sustained:
17		Sections 210, et seq., 350-	Overruled:
18		351); hearsay (Cal. Evid. Code	
19		Sections 1200 et seq. lack of	
20		foundation/lack of	
21		authentication (Cal. Evid.	
22		Code Sections 402, 403,	
23		1400); speculation (Cal. Evid.	
24		Code Section 702(a)).	
25	76. Exhibit "C"	Irrelevant (Cal. Evid. Code	Sustained:
26		Sections 210, et seq., 350-	Overruled:
27		351); hearsay (Cal. Evid. Code	
28		Sections 1200 et seq. lack of	,
		30	

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	foundation/lack of	
	authentication (Cal. Evid.	
	Code Sections 402, 403,	
	1400); speculation (Cal. Evid.	
	Code Section 702(a)).	
77. Exhibit "D"	Irrelevant (Cal. Evid. Code	Sustained:
	Sections 210, et seq., 350-	Overruled:
	351); hearsay (Cal. Evid. Code	
	Sections 1200 et seq. lack of	
	foundation/lack of	
·	authentication (Cal. Evid.	
	Code Sections 402, 403,	
	1400); speculation (Cal. Evid.	
	Code Section 702(a)).	
78. Exhibit "E"	Irrelevant (Cal. Evid. Code	Sustained:
	Sections 210, et seq., 350-	Overruled:
	351); hearsay (Cal. Evid. Code	
	Sections 1200 et seq. lack of	
	foundation/lack of	
	authentication (Cal. Evid.	
	Code Sections 402, 403,	
	1400); speculation (Cal. Evid.	
	Code Section 702(a)).	
79. Exhibit "F"	Irrelevant (Cal. Evid. Code	Sustained:
	Sections 210, et seq., 350-	Overruled:
	351); hearsay (Cal. Evid. Code	
	Sections 1200 et seq. lack of	
	foundation/lack of	

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		authentication (Cal. Evid.	
		Code Sections 402, 403,	
		1400); speculation (Cal. Evid.	
		Code Section 702(a).	
80.	Exhibit "G"	Irrelevant (Cal. Evid. Code	Sustained:
		Sections 210, et seq., 350-	Overruled:
		351); hearsay (Cal. Evid. Code	
		Sections 1200 et seq. lack of	
		foundation/lack of	
		authentication (Cal. Evid.	
		Code Sections 402, 403,	
100000		1400); speculation (Cal. Evid.	
		Code Section 702(a)).	
81.	Exhibit "H"	Irrelevant (Cal. Evid. Code	Sustained:
		Sections 210, et seq., 350-	Overruled:
		351); hearsay (Cal. Evid. Code	
		Sections 1200 et seq. lack of	
		foundation/lack of	
		authentication (Cal. Evid.	
		Code Sections 402, 403,	•
		1400); speculation (Cal. Evid.	
		Code Section 702(a)).	
82.	Exhibit "I"	Irrelevant (Cal. Evid. Code	Sustained:
		Sections 210, et seq., 350-	Overruled:
		351); hearsay (Cal. Evid. Code	
		Sections 1200 et seq. lack of	
		foundation/lack of	
		authentication (Cal. Evid.	
		41	

		Code Sections 402, 403,	
		1400); speculation (Cal. Evid.	
		Code Section 702(a)).	
83.	Exhibit "J"	Irrelevant (Cal. Evid. Code	Sustained:
		Sections 210, et seq., 350-	Overruled:
		351); hearsay (Cal. Evid. Code	
		Sections 1200 et seq. lack of	
		foundation/lack of	
		authentication (Cal. Evid.	
q		Code Sections 402, 403,	
		1400); speculation (Cal. Evid.	
		Code Section 702(a)).	

Dated: August <u>\$\infty\$</u>, 2020

SONGSTAD RANDALL COFFEE & HUMPHREY LLP

By:

NICHOLAS W. LYNES Attorneys for Respondent GARY WILSON

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PROOF OF SERVICE Nicole Prause v. Gary Wilson LASC Case No. 20STRO01022

I am employed in the County of Orange, State of California, over the age of eighteen years, and not a party to the within action. My business address is SONGSTAD RANDALL COFFEE & HUMPHREY LLP, 3200 Park Center Drive, Suite 950, Costa Mesa, California 92626.

On the date set forth below, I served the foregoing copy of the document(s) described as EVIDENTIARY OBJECTIONS TO THE DECLARATION OF NICOLE PRAUSE IN SUPPORT OF PETITIONER'S OPPOSITION TO RESPONDENT'S MOTION TO STRIKE THE REQUEST FOR A CIVIL HARASSMENT RESTRAINING ORDER as follows:

- By Mail: By placing the document(s) listed above in sealed envelope(s) with postage thereon fully prepaid for collection and mailing in Costa Mesa, California, addressed as set forth below, or as stated on the attached service list.
- E-Mail: Based on a court order or an agreement of the parties to accept service by email or electronic transmission, I sent the document(s) to the person(s) at the e-mail address(es) as set forth below, or as stated on the attached service list.

Brett A. Berman
The Berman Law Group
1801 Century Park East, Suite 1830
Los Angeles, CA 90067
(310) 788-3837. Ext. 200
Email: brett@bermanfamilylaw.com

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

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

Executed on August 3, 2020, at Costa Mesa, California.

