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GARY WILSON

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES – CENTRAL DISTRICT, FAMILY LAW**

NICOLE PRAUSE,

Petitioner,

v.

GARY WILSON,

Respondent.

Case No.: 20STRO01022

**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**

Date: August 6, 2020
Time: 8:30 a.m.
Dept.: 22

Respondent GARY WILSON ("Wilson") hereby submits the following evidentiary objections to the Declaration of Petitioner NICOLE PRAUSE's ("Prause") Opposition (the "Opposition") to Wilson's Motion to Strike the Request for a Civil Harassment Restraining Order (the "Motion"):

Portion of Declaration Objected To	Grounds for Objection	Ruling on the Objection
1. Paragraph 3, Page 1:12-13. "... my current belief that Wilson poses a credible threat	Lack of foundation (Cal. Evid. Code Sections 402-403); speculation (Cal. Evid. Code Section 702(a)); conclusory	

Portion of Declaration Objected To	Grounds for Objection	Ruling on the Objection
of violence against me as I am in fear for my safety whether at home or at work.”	(Cal. Evid. Code Sections 801-803).	
2. Paragraph 4, Page 1:14-18. “The list of acts details a long history of conduct of Wilson, which initially started as him stating disapproval and disagreement with my research in pornography. I am not seeking to restrain Wilson’s 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.”	Irrelevant (Cal. Evid. Code Sections 210, et seq., 350-351); speculation (Cal. Evid. Code Section 702(a)); improper opinion testimony of a lay witness (Cal. Evid. Code Section 800); improper legal conclusion (Cal. Evid. Code Section 310).	Sustained: _____ Overruled: _____
3. Paragraph 7, Page 2:1-8. “One such opponent of pornography is Wilson who hosts websites named	Irrelevant (Cal. Evid. Code Sections 210, et seq., 350-351); lack of foundation (Cal. Evid. Code Sections 402, 403); speculation (Cal. Evid. Code	Sustained: _____ Overruled: _____

Portion of Declaration Objected To	Grounds for Objection	Ruling on the Objection
<p>‘YourBrainOnPorn’, ‘PornStudyCritiques’, and YourBrainRebalanced.’ He also runs social media websites including Twitter (@YourBrainOnPorn) and Facebook (YourBrainOnPorn). My research results versus Wilson’s beliefs are NOT the subject of any aspect of my 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 <i>ad</i> <i>hominem</i> attacks to shame me personally and to discredit me professionally as part-and- parcel of Wilson’s campaign of harassment.”</p>	<p>Section 702(a)); improper opinion testimony of a lay witness (Cal. Evid. Code Section 800); inadmissible conclusory statements (Cal. Evid. Code sections 800 – 803); Request for Restraining Order speaks for itself; inadmissible legal conclusions (Cal. Evid. Code Section 310).</p>	
<p>4. Paragraph 8, Page 2:9- 10. “As a result of Wilson’s actions, my business</p>	<p>Irrelevant (Cal. Evid. Code Sections 210, et seq., 350- 351); lack of foundation (Cal. Evid. Code Sections 402, 403);</p>	<p>Sustained: _____ Overruled: _____</p>

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

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

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

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

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

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

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

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

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

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

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

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

Portion of Declaration Objected To	Grounds for Objection	Ruling on the Objection
interference with my personal and professional life.”		
30. Paragraph 11, Subparagraph 11, Page 4:28 through Page 5:3. “As to the content of Wilson’s speech, I am only seeking to restrain his false statements regarding me and my research which have gone well beyond those of someone seeking an intellectual pursuit, but rather towards seeking to identify me as a “target” working at odds with the beliefs of Wilson and those within his group.”	Irrelevant (Cal. Evid. Code Sections 210, et seq., 350- 351); lack of foundation (Cal. Evid. Code Sections 402, 403); inadmissible conclusory statements (Cal. Evid. Code sections 800 – 803); improper legal conclusion (Cal. Evid. Code Section 310); Request for Restraining Order speaks for itself.	Sustained: _____ Overruled: _____
31. Paragraph 11, Subparagraph 12, Page 5:4-7. “In order to provide proper context to the communications aspect of the requested Order, which is simply incidental to the request to be protected against the threat of physical harm, it is necessary to provide the Court with a brief history	Irrelevant (Cal. Evid. Code Sections 210, et seq., 350- 351); lack of foundation (Cal. Evid. Code Sections 402, 403); inadmissible conclusory statements (Cal. Evid. Code sections 800 – 803); improper legal conclusion (Cal. Evid. Code Section 310); Request for Restraining Order speaks	

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

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

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

Portion of Declaration Objected To	Grounds for Objection	Ruling on the Objection
studies and other related topics 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.”	Section 1523).	
38. Paragraph 11, Subparagraph 15, Page 5:26-28. “False Claim: ‘Please know that Dr. Prause has been under investigation by the California Board of Psychology for more than 2 years for her harassment of others ...’ Stated on https://www.YourBrainOnPorn.com (henceforth “YBOP”).”	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); speculation (Cal. Evid. Code Section 702(a)); documents speak for themselves (Cal. Evid. Code Section 1523); improper legal conclusion (Cal. Evid. Code Section 310).	Sustained: _____ Overruled: _____

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

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

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Psychology license until the matter was closed. Attached hereto as Exhibit "C", is a true 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'".	documents speak for themselves (Cal. Evid. Code Section 1523).	
44. Paragraph 11, Subparagraph 15, Page 6:17-20. "Harm: I am a licensed psychologist in California; the attack against me not only prevented me from practicing pending the investigation 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."	Irrelevant (Cal. Evid. Code Sections 210, et seq., 350-351); lack of foundation (Cal. Evid. Code Sections 402, 403); Improper legal conclusion (Cal. Evid. Code Section 310); speculation (Cal. Evid. Code Section 702(a)).	Sustained: _____ Overruled: _____

Portion of Declaration Objected To	Grounds for Objection	Ruling on the Objection
<p>45. Paragraph 11, Subparagraph 16, Page 6:21-24.</p> <p>“False Claim: ‘This thread exposes much about Prause shady and sometimes illegal activities (perjury, defamation, false police reports, lying about FBI reports, false reports to governing bodies). She is 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.”</p>	<p>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.</p>	<p>Sustained: _____</p> <p>Overruled: _____</p>
<p>46. Paragraph 11, Subparagraph 16, Page 6:25-26.</p> <p>“Truth: I have never been named as a suspect the crimes cited by Wilson, much less been convicted of any ‘illegal activities.’”</p>	<p>Irrelevant (Cal. Evid. Code Sections 210, et seq., 350-351); inadmissible conclusory statements (Cal. Evid. Code sections 800 – 803); improper legal conclusion (Cal. Evid. Code Section 310); lack of foundation (Cal. Evid. Code Sections 402-403).</p>	<p>Sustained: _____</p> <p>Overruled: _____</p>

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

Portion of Declaration Objected To	Grounds for Objection	Ruling on the Objection
including pornography, are conducted which is also a facility at which I lived is an implied 'call to arms.' In my experience and within my knowledge of a licensed psychologist, extremist groups tend to develop a 'hive 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.”	1400); speculation (Cal. Evid. Code Section 702(a); improper opinion testimony of a lay witness (Cal. Evid. Code Section 800); improper legal conclusion (Cal. Evid. Code Section 310); speculation (Cal. Evid. Code Section 702(a)).	
50. Paragraph 11, Subparagraph 17, Page 7:14-16. “Harm: The laboratory could not relocate or increase security sufficiently to address the threats of Gary Wilson. As	Irrelevant (Cal. Evid. Code Sections 210, et seq., 350-351); hearsay (Cal. Evid. Code Sections 1200 et seq.); lack of foundation (Cal. Evid. Code Sections 402, 403); speculation (Cal. Evid. Code	Sustained: _____ Overruled: _____

Portion of Declaration Objected To	Grounds for Objection	Ruling on the Objection
for me, such actions create an appreciation of increased danger, and I ended plans to conduct studies at the location out of fear of heightened safety threat.”	Section 702(a); inadmissible conclusory statements (Cal. Evid. Code sections 800 – 803);	
51. Paragraph 11, Subparagraph 17, Page 7:17-18. Attached hereto as Exhibit “E” is a true and correct letter from Dr. Siegel of the University of Pittsburgh addressing the issues posed by Wilson publicly disclosing this location.”	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); speculation (Cal. Evid. Code Section 702(a)); documents speak for themselves (Cal. Evid. Code Section 1523).	
52. Paragraph 11, Subparagraph 18, Page 7:19-20. “False Claim: ‘[I]t was Prause and Ley who first badgered Alex about his penis. THEY brought up his penis to harass	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,	Sustained: _____ Overruled: _____

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

Portion of Declaration Objected To	Grounds for Objection	Ruling on the Objection
26. “‘She turned my inadvertent ‘Miss’ into me being a misogynist (while she asked me about my penis)’”	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);	
56. Paragraph 11, Subparagraph 18, Subparagraph (4), Page 7:27- 28. “‘[Prause] [sic] even posted on @BrainRebalanced - asking me about the size of my penis!’”	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);	Sustained: _____ Overruled: _____
57. Paragraph 11, Subparagraph 18, Subparagraph (5), Page 8:1-4. “‘We are not sure, but the clitoris diddling study (OM) may have hit a predictable snag: the challenge of finding female subjects who want their genitals rubbed while being	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	Sustained: _____ Overruled: _____

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

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

Portion of Declaration Objected To	Grounds for Objection	Ruling on the Objection
presents me as being a shill for the adult-film industry, and it discredits me as a scientist as research firmly concludes that condoms are vital to preventing the spread of STD's, yet the claim is that I am lobbying against this."	Sections 402, 403); speculation (Cal. Evid. Code Section 702(a)); inadmissible conclusory statements (Cal. Evid. Code sections 800 – 803).	
63. Paragraph 11, Subparagraph 20, Page 8:22-24. "Harmful Communication: Wilson wrote a letter to my (then) employer UCLA, stating <i>inter alia</i> that I be investigated and then followed up with a letter informing UCLA 'We've also gradually come to realize that Dr. Prause is ill.'"	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).	Sustained: _____ Overruled: _____
64. Paragraph 11, Subparagraph 20, Subparagraph (1), Page 8:27. "Who's the sick one? Prause"	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.	Sustained: _____ Overruled: _____

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

Portion of Declaration Objected To	Grounds for Objection	Ruling on the Objection
67. Paragraph 11, Subparagraph 20, Subparagraph (4), Page 9:4. “More fake victim-hood from a pathological liar”	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).	Sustained: _____ Overruled: _____
68. Paragraph 11, Subparagraph 20, Subparagraph (5), Page 9:5. “The sociopath claims to be ‘the victim’”	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).	Sustained: _____ Overruled: _____
69. Paragraph 11, Subparagraph 20, Page 9:8-10. “Truth: I have not ever been diagnosed with a mental illness until recently when I have been shown	Irrelevant (Cal. Evid. Code Sections 210, et seq., 350- 351); hearsay (Cal. Evid. Code Sections 1200 et seq.); speculation (Cal. Evid. Code Section 702(a); improper	Sustained: _____ Overruled: _____

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

Portion of Declaration Objected To	Grounds for Objection	Ruling on the Objection
Wilson. I move my office regularly (about once per year) as a policy to keep my staff and research participants safe due to Gary Wilson's stalking. I also employ a subcontract on my office lease so that my name can never be connected to my office location to keep my research participants safe from Gary Wilson. I have 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."	Code Section 702(a); improper opinion testimony of 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); inadmissible legal conclusions (Cal. Evid. Code Section 310).	
72. Paragraph 11, Subparagraph 22, Page 9:24 through Page 10:2. "I have informed all my local	Irrelevant (Cal. Evid. Code Sections 210, et seq., 350-351); hearsay (Cal. Evid. Code Sections 1200 et seq.); lack of	Sustained: _____ Overruled: _____

Portion of Declaration Objected To	Grounds for Objection	Ruling on the Objection
contacts that I cannot appear in photographs that identify my regular location or family contacts. I remind them regularly and seek to remove photographs from social media that might endanger myself, my friends or family. As a result, I am unable to assist groups in which I am a member to recruit, fundraise, or otherwise publicize. I also 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."	foundation/lack of authentication (Cal. Evid. Code Sections 402, 403, 1400); speculation (Cal. Evid. Code Section 702(a)); improper opinion testimony of a lay witness (Cal. Evid. Code Section 800); documents speak for themselves (Cal. Evid. Code Section 1523); conclusory statements (Cal. Evid. Code Sections 800-803).	
73. Paragraph 11, Subparagraph 23, Page 10:3-11. "Since the COVID-19 crisis has overtaken our country, my apprehension of imminent harm has increased	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,	Sustained: _____ Overruled: _____

Portion of Declaration Objected To	Grounds for Objection	Ruling on the Objection
significantly as social unrest appears to be escalating throughout the country and it appears scientists and other public officials have come 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.”	1400); speculation (Cal. Evid. Code Section 702(a)); improper opinion testimony of a lay witness (Cal. Evid. Code Section 800).	

EVIDENTIARY OBJECTIONS TO EXHIBITS ATTACHED TO DECLARATION OF
NICOLE PRAUSE

Portion of Declaration Objected To	Grounds for Objection	Ruling on the Objection
74. Exhibit "A"	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); speculation (Cal. Evid. Code Section 702(a)); inadmissible opinion (Cal. Evid. Code Section 800).	Sustained: _____ Overruled: _____
75. Exhibit "B"	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); speculation (Cal. Evid. Code Section 702(a)).	Sustained: _____ Overruled: _____
76. Exhibit "C"	Irrelevant (Cal. Evid. Code Sections 210, et seq., 350-351); hearsay (Cal. Evid. Code Sections 1200 et seq. lack of	Sustained: _____ Overruled: _____

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

		authentication (Cal. Evid. Code Sections 402, 403, 1400); speculation (Cal. Evid. Code Section 702(a)).	
80.	Exhibit "G"	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); speculation (Cal. Evid. Code Section 702(a)).	Sustained: _____ Overruled: _____
81.	Exhibit "H"	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); speculation (Cal. Evid. Code Section 702(a)).	Sustained: _____ Overruled: _____
82.	Exhibit "I"	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.	Sustained: _____ Overruled: _____

	Code Sections 402, 403, 1400); speculation (Cal. Evid. Code Section 702(a)).	
83. Exhibit "J"	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); speculation (Cal. Evid. Code Section 702(a)).	Sustained: _____ Overruled: _____

Dated: August 3, 2020

SONGSTAD RANDALL
COFFEE & HUMPHREY LLP

By: 

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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.

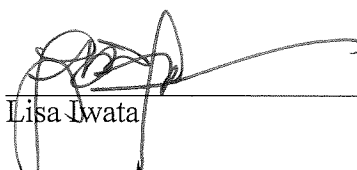
☒ **E-Mail:** Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I sent the document(s) to the person(s) at the e-mail address(es) as set forth below, or as stated on the attached service list.

Brett A. Berman
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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.



Lisa Iwata