

1 CASE NUMBER: 25STRO03858
2 CASE NAME: MARIO LOPEZ VS. DESIREE TOWNSEND
3 LOS ANGELES, CA AUGUST 8, 2025
4 DEPARTMENT 65 Hon. KIMBERLY REPECKA, judge
5 REPORTER: ROCIO M. LOPEZ, CSR NO. 11194
6 TIME: P.M. session

7 APPEARANCES:

8 Petitioner not resent, REPRESENTED by
9 ALEXANDRIA KAZARIAN and DANIEL TAPETILLO,
10 attorneys at law; Respondent Present, IN PROPIA
11 PERSONA.

12
13 THE COURT: THE COURT IS CALLING ADD-ON NUMBER 2,
14 25STRO03858, MARIO LOPEZ VERSUS TOWNSEND; BOTH PARTIES
15 ARE PRESENT OR RATHER AT COUNSEL TABLE. PETITIONER'S
16 COUNSEL IS PRESENT AND RESPONDENT IS PRESENT. AND WE
17 ARE IN RESPONDENT'S CASE.

18 ARE YOU JUST GOING TO PROCEED WITH YOUR
19 TESTIMONY AT THIS POINT?

20 MS. TOWNSEND: I FILED A SUPPLEMENTAL DECLARATION
21 FILED BASED ON TESTIMONY THAT WAS GIVEN BY MS. LOPEZ AND
22 MR. LOPEZ THAT SUPPORTS THE FINDING THAT THERE WAS AN
23 INDIVIDUAL WORKING IN CONCERT WITH ATTORNEY ALEXANDRA
24 KAZARIAN TO PROVIDE INFORMATION TO HIS COUNSEL.

25 AND SO, IN SUPPORT OF THAT DECLARATION, I'D
26 LIKE TO REQUEST THAT THE COURT ALLOW ME TO BRING A
27 COUPLE OF WITNESSES FORWARD, IF I MAY, QUICK TESTIMONY
28 FROM EACH?

1 THE COURT: ARE YOU GOING TO BE FILING ANY KIND OF
2 WITNESS LIST, BUT YOU'RE SAYING THESE ARE --

3 MS. TOWNSEND: THEY'RE RELEVANT TO THE DEFENSE, SO
4 I'D LIKE TO CALL ALEXANDRA KAZARIAN, AND GIVEN THAT THE
5 TESTIMONY BY BOTH MR. LOPEZ AND MS. LOPEZ STATED THAT
6 THEY DON'T KNOW THE INDIVIDUAL. THERE SHOULDN'T BE ANY
7 BREACH OF CLIENT ATTORNEY PRIVILEGE, AND THE QUESTIONING
8 WOULD STRICTLY BE TO WHAT HER RELATIONSHIP WAS WITH
9 THIS, WHAT THIS INDIVIDUAL TOLD HER.

10 BECAUSE I BELIEVE THAT IS INTERVAL TO THE
11 RESPONSE TO MY OPPOSITION AS IN THEIR PETITION THEY WERE
12 ARGUING THAT I WAS MAKING ONGOING COMMENTS IN VIDEOS
13 THAT WERE DEFAMATORY, BUT A LARGE PART OF THE
14 INFORMATION I RECEIVED WAS FROM THIS INDIVIDUAL
15 IDENTIFIED BY MS. LOPEZ.

16 SO, AGAIN, I WOULD KEEP ANY QUESTIONING TO NOT
17 BREACH CLIENT, ATTORNEY-CLIENT PRIVILEGE, BUT I'D LIKE
18 THAT ABILITY TO QUESTION HER AT LEAST ON WHO THE
19 INDIVIDUAL WAS, IF I MAY?

20 THE COURT: SO I'M NOT GOING TO HAVE YOU CROSS
21 EXAMINE PETITIONER'S ATTORNEY. I THINK THAT IT IS A
22 LEGITIMATE QUESTION WHEREIN A DISCOVERY CONTEXT TO SAY
23 THAT SHE MAY HAVE TO IDENTIFY WHO THAT INDIVIDUAL IS WHO
24 IS GIVING HER INFORMATION ESPECIALLY IT'S BEEN TESTIFIED
25 TO BY WITNESSES INCLUDING ON DIRECT.

26 SO WHO IS THAT INDIVIDUAL THAT WAS REFERENCED
27 IN THE TESTIMONY EARLIER?

28 MS. KAZARIAN: I HAVE COME TO BELIEVE THAT I

1 ACTUALLY THINK THE PERSON WHO REACHED OUT TO ME RANDOMLY
2 WAS ACTUALLY MS. TOWNSEND PRETENDING TO BE SOMEBODY WITH
3 INFORMATION THAT COULD HELP MR. LOPEZ'S CASE.

4 MS. TOWNSEND: I THINK AT THE TIME IT'S IMPORTANT
5 TO GET THIS UNDER OATH BECAUSE NOW SHE'S INSINUATING
6 THAT I --

7 THE COURT: SHE'S NOT INSINUATING IT. SHE'S SAYING
8 IT DIRECTLY.

9 MS. TOWNSEND: RIGHT. RIGHT. RIGHT.

10 THE COURT: OKAY. HOW DID THIS PERSON REACH OUT TO
11 YOU GENERALLY?

12 MS. KAZARIAN: INITIALLY THROUGH A DIRECT MESSAGE
13 ON INSTAGRAM.

14 THE COURT: OKAY. SO THERE'S A USER NAME OR
15 HANDLE?

16 MS. KAZARIAN: YES.

17 THE COURT: OKAY. WHAT'S THAT?

18 MS. KAZARIAN: I DON'T KNOW THAT I ACTUALLY HAVE IT
19 ANYMORE. I'LL CHECK, YOUR HONOR.

20 THE COURT: JUST TO CLARIFY, I'M NOT LETTING YOU
21 CROSS EXAMINE HER. I'M NOT MAKING HER A WITNESS ON THE
22 CASE, AND THAT'S WHY I'M NOT PLACING HER UNDER OATH.
23 I'M TAKING THIS IN THE CONTEXT OF THIS IS ESSENTIALLY A
24 DISCOVERY REQUEST.

25 MS. TOWNSEND: YES. THANK YOU.

26 YOUR HONOR, IS IT POSSIBLE TO SEE THESE
27 MESSAGES?

28 THE COURT: WELL, LET'S START WITH THE ACTUAL

1 HANDLE ITSELF.

2 MS. TOWNSEND: OKAY.

3 MS. KAZARIAN: I DON'T BELIEVE THAT THE INSTAGRAM
4 ACCOUNT -- I BELIEVE THAT THE INSTAGRAM ACCOUNT MAY NOT
5 EXIST ANYMORE WHICH IS WHY I'M GOING THROUGH MY -- I'M
6 HAVING TROUBLE FINDING THE MESSAGE, BUT I DON'T THINK IT
7 EXISTS ANYMORE, BUT I AM LOOKING THROUGH THE
8 SCREENSHOTS.

9 SO THE -- I DON'T HAVE THE INSTAGRAM HANDLE,
10 UNFORTUNATELY. I HAVE SCREENSHOTS OF THE MESSAGES.

11 THE COURT: OKAY. WELL, YOU KNOW, WE CAN GO AHEAD
12 AND DISPLAY THOSE JUST SO THE COURT HAS THAT ADDITIONAL
13 CONTEXT AND SO DOES THE RESPONDENT.

14 MS. KAZARIAN: NOW, THE MESSAGES ARE GONE. SO THE
15 MESSAGES HAVE BEEN DELETED FROM MY INSTAGRAM IN-BOX.

16 MS. TOWNSEND: SO HOW IS THAT POSSIBLE?

17 MS. KAZARIAN: SCREENSHOTS THAT I HAVE --

18 MS. TOWNSEND: EVEN IF THE ACCOUNT IS GONE, THE
19 MESSAGES ARE STILL THERE. CAN YOU PUSH YOUR PHONE UP
20 JUST A LITTLE SO I CAN SEE THE -- SO YOU BELIEVE THAT I
21 WAS THE INDIVIDUAL THAT SENT THIS?

22 THE COURT: WELL, YOU'RE NOT QUESTIONING HER.

23 MS. TOWNSEND: OH, SORRY. MY APOLOGIES.

24 DO YOU HAVE ANY OTHER MESSAGES?

25 THE COURT: ARE THERE MORE MESSAGES THAN THIS?

26 MS. KAZARIAN: SO HERE IS THE FIRST MESSAGE. HERE
27 IS THE SECOND MESSAGE.

28 MS. TOWNSEND: OH, INTERESTING. OKAY.

1 MS. KAZARIAN: THEN IT SAID, "PLEASE CHECK YOUR
2 DM'S."

3 MS. TOWNSEND: CAN YOU MOVE THE PHONE UP JUST A
4 LITTLE? THANK YOU.

5 THE COURT: OKAY. I'VE READ IT.

6 MS. TOWNSEND: OKAY.

7 MS. KAZARIAN: I ALSO RECEIVED TEXT MESSAGES FROM
8 THIS PERSON. BECAUSE I DID ASK TO RECEIVE ANY TEXT
9 MESSAGES BETWEEN THE TWO OF THEM BECAUSE I DIDN'T KNOW
10 IF THIS WAS JUST A RANDOM SPAMMER. SO I CAN SHOW THOSE
11 AS WELL IF THE COURT WOULD LIKE.

12 THE COURT: OKAY. SURE.

13 MS. KAZARIAN: I DON'T KNOW IF THE COURT WANTS TO
14 SEE EVERY MESSAGE, BUT IT STARTS HERE.

15 MS. TOWNSEND: HIS NAME IS ANGEL. OKAY.

16 MS. KAZARIAN: IT GOES ON FOR A WHILE, BUT THERE
17 WERE -- WELL --

18 MS. TOWNSEND: THIS IS YOUR MESSAGE BACK TO HIM?
19 I'M SORRY. I CAN'T TELL FROM CLOSE.

20 THE COURT: MS. TOWNSEND.

21 MS. TOWNSEND: I'M SORRY. IT TURNED OFF. I
22 COULDN'T SEE IT. THE SCREEN, HER SCREEN TURNED OFF.

23 THE COURT: IT STARTED TO GO DARK. YOU STARTED TO
24 ASK AN UNRELATED QUESTION. PLEASE STOP ASKING QUESTIONS
25 OF THE ATTORNEY.

26 MS. TOWNSEND: I APOLOGIZE.

27 DO YOU MIND SCROLLING UP THE SCREEN. GO -- GO
28 JUST A LITTLE BIT.

1 THE COURT: WHY DON'T WE ZOOM OUT SO THAT THE
2 SCREEN IS UP THERE.

3 MS. TOWNSEND: CAN YOU SCROLL UP? SORRY. IT CUT
4 OUT. I CAN'T SEE.

5 THE COURT: MS. TOWNSEND.

6 MS. TOWNSEND: OH, I'M SORRY. I THOUGHT I COULD
7 LOOK AT THE MESSAGES.

8 THE COURT: NO. YOU'RE NOT GOING TO DIRECT HER IN
9 ANY WAY AT ALL.

10 MS. TOWNSEND: OKAY.

11 THE COURT: HOW LONG DID YOU END UP CORRESPONDING
12 WITH THIS PERSON WITH ANGEL FOR?

13 MS. KAZARIAN: THE FIRST MESSAGE WAS JUNE 29TH.
14 THERE WAS CORRESPONDENCE THAT DAY. THERE WAS
15 CORRESPONDENCE ON JUNE 30TH WHERE THIS PERSON WAS
16 SENDING ME ARTICLES AND HER POSTS AND MORE INFORMATION.
17 THERE WAS ANOTHER MESSAGE RECEIVED FROM THEM ON
18 JULY 3RD. ON JULY 14TH IS WHEN I BEGAN BELIEVING THAT
19 THIS WAS NOT -- I MEAN, I WAS SUSPICIONS, ANYWAY.

20 BUT ON JULY 14 THIS PERSON TOLD ME THAT THEY
21 HAD FILED THEIR OWN TRO AGAINST HER. I ASKED FOR THE
22 CASE NUMBER. THEY SAID THEY DIDN'T HAVE IT. I HAD THEN
23 LEARNED ABOUT A -- I DON'T KNOW. I THINK IT WAS A
24 TIK-TOK FROM MS. TOWNSEND WHERE SHE POSTED SCREENSHOTS
25 OF THE TEXT MESSAGES OF MYSELF AND THIS PERSON WHICH
26 LEAD ME TO BELIEVE THAT THIS WAS VERY LIKELY HER.

27 AND THEN THE NEXT INITIATION OF A MESSAGE I
28 RECEIVED FROM THAT PERSON WAS JULY 15 STATING THE TRO

1 WAS GRANTED AGAINST HER. I WILL HAVE HER SERVED TODAY.
2 I DIDN'T RESPOND. THEY REACHED OUT TO ME AGAIN WITH
3 SCREENSHOTS OF TEXT MESSAGES FROM THE TWO OF THEM. I
4 AGAIN SAID, "CAN YOU SEND ME THE CASE NUMBER FOR YOUR
5 TRO" AND THIS PERSON SAID, "I'LL GIVE IT TO YOU
6 TOMORROW AT THE COURTHOUSE," WHICH WAS -- THEY SAID THAT
7 YESTERDAY.

8 I LOOKED UP HER NAME. THERE IS NO OTHER TRO
9 THAT IS IN THE SYSTEM. SO I DON'T KNOW WHY SOMEONE
10 WOULD RANDOMLY REACH OUT TO ME AND LIE TO ME UNLESS THEY
11 WERE TRYING TO GET INFORMATION FROM ME OR TRY TO PUT ME
12 IN A WEIRD SITUATION AND I DON'T KNOW WHY SOMEBODY WOULD
13 REACH OUT TO ME TO TRY TO HELP ME AND THEN FORWARD MY
14 TEXT MESSAGES TO MS. TOWNSEND, SO I HAVE COME --

15 THE COURT: IT'S BIZARRE.

16 MS. KAZARIAN: -- TO BELIEVE THAT I ACTUALLY THINK
17 THAT IT IS LIKELY MS. TOWNSEND.

18 THE COURT: OKAY. I UNDERSTAND THE REASON FOR YOUR
19 SUSPICIONS AROUND THAT.

20 OKAY. SO YOU'VE SEEN THE TEXTS?

21 MS. TOWNSEND: YES. LET'S PROCEED WITH MY
22 TESTIMONY. I'M READY TO GO, YES.

23 THE COURT: WE'LL HAVE YOU SWORN.

24 THE CLERK: Do you solemnly state under penalty of
25 perjury that the testimony you may give in the cause now
26 pending before this court shall be the truth, the whole
27 truth and nothing but the truth?

28 MS. TOWNSEND: YES, I DO.

1 THE CLERK: THANK YOU.

2 MS. TOWNSEND: YOUR HONOR, MAY I BRING JUST MY
3 DECLARATION AND THE PETITION ITSELF? I WANTED TO
4 DIRECTLY COVER SOME OF THE ITEMS WITHIN THE PETITION.

5 THE COURT: SURE. THAT'S FINE.

6 MS. TOWNSEND: OKAY. THANK YOU.

7 THE COURT: YOU'RE GOING TO GO UP TO THE WITNESS
8 STAND?

9 MS. TOWNSEND: I'M SORRY. OH, ISN'T THAT WHERE YOU
10 WANT ME?

11 THE COURT: YOU CAN STAY. YOU CAN STAY AT COUNSEL
12 TABLE, FINE.

13 MS. TOWNSEND: OH, I DIDN'T KNOW WHERE YOU
14 PROCEDURALLY YOU WANTED ME. FIRST TIME IN COURT, SO.

15 THE COURT: DIRECT TESTIMONY WITHOUT THE ASSISTANCE
16 OF THE ATTORNEY, THEY JUST SPEAK FROM THERE.

17 MS. TOWNSEND: UNDERSTOOD. WELL, THANK YOU.

18 SO I WOULD LIKE TO FIRST START, IF I MAY, BY
19 ADDRESSING JUST SOME OF THE ITEMS WITHIN THE DECLARATION
20 THAT I FILED. SO I AS --

21 MS. KAZARIAN: IF I CAN HAVE ONE MOMENT, ACTUALLY,
22 YOUR HONOR?

23 THE COURT: WHAT'S THE ISSUE?

24 MS. KAZARIAN: I DO HAVE AN OBJECTION TO THE
25 DECLARATION ITSELF BEING REFERENCED. I HAVE NOT BEEN
26 SERVED WITH IT YET. IT WAS FILED, I BELIEVE, THE DAY
27 BEFORE YESTERDAY, SO I DON'T -- I DON'T KNOW HOW THE
28 COURT WANTS TO PROCEED WITH IT.

1 THE COURT: SO I'LL LET THE PARTIES KNOW THAT I
2 ONLY REALIZED THAT THERE WAS ANOTHER DECLARATION FILED
3 NEAR THE END OF LUNCH TODAY, SO I HAVE REVIEWED A LOT OF
4 THE ATTACHMENTS, BUT YOU SHOULD PROBABLY TREAT THE
5 PETITION THAT YOU FILED MORE AS AN OUTLINE FOR YOUR
6 TESTIMONY, AND JUST TREAT YOUR TESTIMONY AS THE
7 EVIDENCE.

8 MS. TOWNSEND: RIGHT, YOUR HONOR. I DIDN'T EXPECT
9 THE ADMISSION ABOUT THIS THIRD PARTY, SO THAT'S WHY I
10 FILED THE DECLARATION TO BRING IN THE MESSAGES THAT I
11 RECEIVED.

12 THE COURT: OKAY. AND THAT'S FINE, AND YOU CAN
13 REFERENCE THE MESSAGES DURING YOUR TESTIMONY. YOU CAN
14 PRESENT THOSE DURING YOUR TESTIMONY; BUT SINCE IT WAS
15 FILED SOMEWHAT LAST MINUTE AND YOU ARE PROVIDING YOUR
16 TESTIMONY ANYWAY, YOU MIGHT AS WELL JUST ADDRESS
17 EVERYTHING YOU WANT TO THROUGH TESTIMONY PLUS THE
18 EXHIBITS.

19 MS. TOWNSEND: OKAY. EXCELLENT. SO I APOLOGIZE
20 FOR UNTIMELY FILING. I DIDN'T KNOW OF THIS ADMISSION
21 UNTIL AFTER -- OR I WASN'T AWARE UNTIL THE HEARING, SO I
22 QUICKLY FILED IT THAT DAY AFTER THE HEARING, SO I DO
23 APOLOGIZE.

24 SO I JUST WANTED TO GO THROUGH AND AT LEAST
25 EXPLAIN THE SIMILAR THING HAPPENED WITH ME. THIS
26 INDIVIDUAL REACHED OUT TO ME THROUGH TIK TOK AND
27 IDENTIFIED HIMSELF AS ANGEL, AND SAID HE COULD HELP
28 PROCESS SERVE MARIO LOPEZ, AND THAT HE WORKED AT NBC.

1 SO I WAS A LITTLE SUSPICIONS ALSO, BUT I STARTED
2 SPEAKING WITH HIM. AND AS YOU CAN SEE, THE MESSAGES
3 BEGAN APPROXIMATELY JUNE 9TH, AND CONTINUED FOR QUITE
4 SOMETIME. AND A LOT OF WHAT HE WAS PROVIDING ME WERE
5 ALLEGATIONS THAT MR. LOPEZ WAS UNDER INVESTIGATION BY
6 NBC UNIVERSAL. SO THAT LEAD TO ME MAKING POSTS
7 DESCRIBING THOSE ALLEGATIONS WHICH I LATER FOUND OUT NOW
8 WERE FALSE.

9 SO A LOT OF THE SUPPORT OF THE PETITION ARE
10 THESE ONGOING ALLEGATIONS THAT I WAS ALLEGING, BUT THEY
11 WERE BEING FED TO ME BY THIS THIRD PARTY NAMED ANGEL.
12 SO I WORKED IN LAW FOR MANY YEARS. I TAKE ALLEGATIONS
13 VERY SERIOUSLY, AND I DON'T MAKE ANYTHING -- I'M VERY
14 CAREFUL WITH WHAT I SAY UNLESS I HAVE SUPPORTING
15 EVIDENCE TO THAT, SO THAT IS THE ONLY REASON I MADE
16 VIDEOS IN REGARD TO NBC UNIVERSAL.

17 SO THE CONCERN I HAVE IS, WHEN ALEXANDRA LIKED
18 THESE VIDEOS THAT I SHOWED AS PART OF MY -- MY
19 ANTI-SLAPP, AND ALSO, I BELIEVE I HAD THEM IN THE
20 OPPOSITION, ALEXANDRA SPECIFICALLY LIKED THE VIDEO ABOUT
21 NBC UNIVERSAL, WHICH LEAD ME TO BELIEVE THAT SHE WAS
22 WORKING IN CONCERT WITH THIS INDIVIDUAL, ANGEL, TO MAYBE
23 FEED ME INFORMATION OR THE TWO WERE ON THE SAME PAGE
24 ABOUT WHAT INFORMATION I WAS BEING GIVEN, SO IT
25 CONTRADICTS WHY -- IT CONTRADICTS ANY SORT OF ALLEGATION
26 THAT I WOULD HAVE BEEN THE ONE BEHIND DOING THIS SORT OF
27 PRETENDING TO BE ANGEL AND FEEDING MR. LOPEZ'S ATTORNEY
28 FALSE INFORMATION, WHICH ACTUALLY, IF YOU LOOK AT THE

1 INFORMATION THAT WAS PROVIDED, IT WAS ACTUALLY CORRECT
2 AND MORE DISPARAGING TO ME INTO THIS PROCEEDINGS FOR ME
3 THAN IT WAS FOR MR. LOPEZ. IF ANYTHING, ALL OF THE
4 INFORMATION OBTAINED AND THE INFORMATION FED TO ME
5 ACTUALLY IS DETRIMENTAL TO MY RESPONSE. SO I FIND IT
6 HARD TO BELIEVE THAT I WOULD HAVE, YOU KNOW, FAKED AN
7 ACCOUNT TO CONTACT THE ATTORNEY TO DESTROY MY OWN
8 RESPONSE.

9 SO, FURTHERMORE, IF YOU LOOK THROUGH THE
10 MESSAGES, LIKE I HAD STATED, THIS INDIVIDUAL HAD SENT ME
11 MULTIPLE PHOTOS, AND THE PHOTOS BEGIN IN EXHIBIT 3, PAGE
12 1. HE SENDS ME A PHOTO OF HIMSELF WITH ALLEGEDLY
13 HIMSELF WITH MARIO LOPEZ, AND A PHOTO OF HIMSELF.

14 THE COURT: OKAY. HOLD ON. LET ME JUST FIND IT.

15 MS. TOWNSEND: EXHIBIT C, PAGE 1.

16 THE COURT: OKAY. YES.

17 MS. TOWNSEND: PAGE 1, SO THIS INDIVIDUAL SENDS ME
18 SEVERAL PHOTOS THROUGH TEXT MESSAGES AND HE SAYS HE'S
19 FRIENDS WITH MARIO, AND HE SENDS ME MULTIPLE PHOTOS.
20 THESE ARE ONLY A FEW OF THEM. AND IT'S HIM PICTURED
21 WITH MR. LOPEZ, HIM PICTURED WITH, I BELIEVE, NANCY
22 PELOSI, AND HIM PICTURED WITH THIS OTHER INDIVIDUAL. I
23 CAN'T REMEMBER HIS NAME, BUT HE'S LIKE A WRESTLER OR
24 BOXER.

25 AND THEN I CHECKED THE ASSOCIATED BETA DATA TO
26 ENSURE IT WASN'T ARTIFICIALLY AI CREATED; AND SO, AS FAR
27 AS I COULD TELL, THE LOPEZ, MR. LOPEZ'S PHOTO, I
28 COULDN'T REALLY PIN THAT DOWN WITH A META DATA, BUT THE

1 PHOTO OF HIM WITH NANCY PELOSI DOES SHOW, BASED ON THE
2 INFORMATION HERE, WAS TAKEN ON AN APPLE IPHONE. AND
3 THEN THE FOLLOWING PICTURE OF HIM WITH THIS OTHER
4 INDIVIDUAL, SAME THING, SO IT SHOWS THE ACCURACY. THE
5 META DATA BASICALLY CONFIRMS THAT THESE ARE LEGITIMATE
6 PHOTOS. SO I HAVE AI SOFTWARE. I DID A REVERSE IMAGE
7 SEARCH OF THIS INDIVIDUAL'S FACE.

8 AND I HAD COME UP ACROSS A DISTRICT ATTORNEY OF
9 SAN LUIS OBISPO PRESS RELEASE THAT IDENTIFIED THE MAN I
10 BELIEVED TO BE JOSEA JAMES JOHNSTONE, SO I DUG IN
11 FURTHER, AND THE MAN HAS VERY DISTINCTIVE (SIC) BULLS,
12 SO I WAS ABLE TO CONFIRM IT.

13 I FOUND ON EXHIBIT D, PAGE 3 IS ONE OF THE
14 VICTIMS. HER NAME WAS BECKY HART. SHE WAS AN
15 EX-GIRLFRIEND OF MR. JOHNSTONE, SO I REACHED OUT TO HER.
16 SHE RUNS A YOGA STUDIO IN SAN LUIS OBISPO, AND SHE -- I
17 SENT HER ON EXHIBIT E, STARTING ON PAGE 1, PHOTOS OF THE
18 INDIVIDUAL IDENTIFIED WITH MARIO LOPEZ AND THESE OTHER
19 INDIVIDUALS, AND SHE CONFIRMED THAT IT WAS HER EX THAT
20 WAS SENTENCED TO PRISON FOR FOUR YEARS.

21 I DON'T KNOW IF I INCLUDED IN HERE, BUT HE DID
22 GO BY THE NAME -- OH, HERE WE GO. PAGE 4. HE DOES GO
23 BY THE PSEUDO NAME ANGEL. I SENT THE TEXT MESSAGE
24 WHERE --

25 THE COURT: WHERE IS THAT? VERY QUICKLY.

26 MS. TOWNSEND: I APOLOGIZE.

27 THE COURT: YOU SAID PAGE 4, WHICH EXHIBIT?

28 MS. TOWNSEND: WE'RE GOING TO GO EXHIBIT E, PAGE 4.

1 THE COURT: OKAY.

2 MS. TOWNSEND: AND I ASKED IF HE EVER USED THE
3 PSEUDO NAME ANGEL. SHE DIDN'T ANSWER IN THAT, BUT I DID
4 HAVE A PHONE CONVERSATION WITH HER, AND SHE DID CONFIRM
5 HE USES THE WORD ANGEL OR HE USES THAT PSEUDO NAME. SO,
6 APPARENTLY, THIS INDIVIDUAL, I -- I DON'T BELIEVE THAT
7 HE NECESSARILY WAS DIRECTLY WORKING WITH MR. LOPEZ. I
8 THINK PERHAPS MAYBE HE WAS JUST A FAN OR SOMEBODY THAT
9 REACHED OUT; BUT HE WAS CLEARLY WORKING IN CONCERT WITH
10 THE ATTORNEY TO FEED FALSE INFORMATION.

11 AND EVEN MORE DAMNING IS THIS SAME TEXT MESSAGE
12 ON PAGE 6, THE SAME PHONE NUMBER THAT WAS IDENTIFIED IN
13 MS. KAZARIAN'S TEXT MESSAGE IS THE SAME PHONE NUMBER
14 THAT HE GAVE ME AND IT TIES BACK TO SAN LUIS OBISPO
15 COUNTY, SO IT WOULD BE VERY DIFFICULT FOR ME TO CREATE
16 FALSE PHOTOS, GET A PHONE NUMBER IN SAN LUIS OBISPO
17 COUNTY AND THEN --

18 THE COURT: IS THIS THE SAME PHONE NUMBER OF
19 MS. KAZARIAN? YOU HAD IT AT THE TOP OF YOUR SCREENSHOT.

20 MS. TOWNSEND: IT'S ON PAGE 6.

21 THE COURT: I SEE IT ON YOURS, BUT I WANT TO SEE IF
22 THERE'S A COMPARISON.

23 MS. KAZARIAN: (805) 286-6094.

24 THE COURT: OKAY. YEAH.

25 MS. TOWNSEND: SO THIS INDIVIDUAL, BECKY HART, THE
26 EX-GIRLFRIEND, DID CONFIRM THAT THIS IS THE SAME
27 INDIVIDUAL THAT WAS SENTENCED TO FOUR YEARS IN PRISON
28 FOR STALKING AND HARASSING WOMEN IN SAN LUIS OBISPO

1 COUNTY INCLUDING THE VICTIM HERSELF, BECKY HART, HIS
2 NAME IS JOSEA JAMES JOHNSTONE. SO MOVING ON FROM THAT,
3 I'D LIKE TO GO TO EXHIBIT F BECAUSE MR. LOPEZ HAD
4 BROUGHT UP IN HIS TESTIMONY THAT I HAD ALLEGEDLY BEEN ON
5 THE NBC UNIVERSAL CAMPUS MULTIPLE TIMES; HOWEVER, I HAVE
6 ONLY EVER BEEN ON THAT CAMPUS ONCE IN MY ENTIRE LIFE,
7 AND THAT WAS FOR A SING YEAR EXPO L.A. ON THAT RAN OVER
8 JUNE 6TH AND 7TH.

9 SO I WAS ONLY THERE ON THE 7TH, AND I'M SURE
10 THEY COULD OR HAVE LOCATED ANY FOOTAGE THAT'S GOING TO
11 SHOW I WAS ONLY THERE ON THAT DAY WHICH IS A NON-FILMING
12 DAY FOR MOST PRODUCTIONS AT NBC, AND I WAS THERE WITH
13 WOMEN IN MEDIA. IT'S AN ORGANIZATION I WORK WITH TO
14 HELP FUNDRAISE TO BRING MORE, BRING MORE CAREERS TO
15 WOMEN THAT WORK IN MEDIA. SO THIS IS THE PROOF THAT I
16 WAS THERE LAWFULLY THAT DAY, AND I HAVE NOT BEEN THERE
17 BEFORE OR SINCE THEN.

18 SO THE -- ON PAGE 5 IS JUST MY MEMBERSHIP WITH
19 WOMEN IN MEDIA, AND SO, THAT CONCLUDES MY DECLARATION.
20 IF WE -- IF YOU DON'T MIND, I'D LIKE TO GO THROUGH THE
21 PETITION ITSELF, AND JUST A FEW ITEMS WITHIN THERE TO
22 DIRECTLY ADDRESS THEM.

23 THE COURT: OKAY.

24 MS. TOWNSEND: LET'S SEE. FIRST THING, I CAN'T
25 TELL WHAT PAGE, BUT I WILL TRY TO DESCRIBE TO TELL YOU
26 WHAT THE PAGES LOOKS LIKE. I'D LIKE TO START WITH THE
27 BRIEF. LET'S SEE.

28 SO PETITIONER SITES FOR THE REASON WARRANTING

1 THE RESTRAINING ORDER IS INFLAMMATORY, BASELESS AND
2 PARANOID CONSPIRACY THEORIES, AND A DELUSIONAL FIXATION
3 ON MR. LOPEZ AND HIS FAMILY; HOWEVER, THAT'S QUITE THE
4 OPPOSITE.

5 SO LARGELY WHAT THEY ARE CITING IS THE
6 DEFAMATION LAWSUIT THAT I FILED, WHICH IS, DID NOT SITE
7 ANY ALLEGATIONS OTHER THAN WHAT MY PERSONAL EXPERIENCE
8 WAS, AND ALSO COMMENTS THAT I HAD SEEN ON SOCIAL MEDIA
9 TO BASICALLY DEMONSTRATE THAT AS A PUBLIC FIGURE WHO
10 HIMSELF HAS BEEN THE TARGET OF DEFAMATION CLAIMS, HE
11 SHOULD BE UNDERSTANDING OF MY SITUATION TO NOT BE
12 ALLEGING THAT I FAKED AN ILLNESS.

13 SO ANY -- ANY ITEM WITHIN MY DEFAMATION SUIT,
14 FIRST OF ALL, ARE PROTECTED UNDER LITIGATION PRIVILEGE,
15 AND I'D LIKE TO FURTHER GO THROUGH --

16 THE COURT: I DIDN'T UNDERSTAND THE PETITION AS
17 BEING BASED ON THE FACT THAT YOU FILED A DEFAMATION
18 SUIT.

19 MS. TOWNSEND: SO THEY STATE IN HERE, "AMONG THE
20 DISTURBING ALLEGATIONS CONTAINED IN OUR 37-PAGE
21 COMPLAINT," SO THEY DID SPECIFICALLY CALL OUT THE SUIT
22 ITSELF AS SUPPORTIVE OF THE RESTRAINING ORDER.

23 THE COURT: WHERE ARE YOU READING FROM?

24 MS. TOWNSEND: I CAN'T TELL WHAT PAGE IT'S ON, BUT
25 IF YOU GO TO THE -- IT STARTS WITH, "MS. TOWNSEND'S
26 CIVIL COMPLAINT AGAINST MR. LOPEZ." I APOLOGIZE. I
27 DON'T KNOW WHAT PAGE IT'S ON.

28 THE COURT: OKAY. WELL, THEN STOP FOR A SECOND

1 BECAUSE --

2 MS. TOWNSEND: SHOULD I SHOW YOU? WOULD THAT HELP
3 OR --

4 THE COURT: WHAT WAS THE ACTUAL LANGUAGE THAT YOU
5 JUST SAID?

6 MS. TOWNSEND: "MS. TOWNSEND'S CIVIL COMPLAINT."

7 THE COURT: SO THIS IS PAGE 14 OF 50.

8 "MS. TOWNSEND'S CIVIL COMPLAINT FILED ON JUNE 13TH,
9 2025 IS NOT A TYPICAL DEFAMATION SUIT. IT'S FILLED WITH
10 INFLAMMATORY, BASELESS AND PARANOID CONSPIRACY THEORIES
11 THAT REVEAL THE EXTENT OF HER DELUSION FIXATION OF
12 MR. LOPEZ AND MS. FAMILY." THAT?

13 MS. TOWNSEND: YES. YES.

14 THE COURT: SO WHY DON'T I JUST CLEAR SOMETHING UP.
15 I'M NOT GOING TO ISSUE A RESTRAINING ORDER BASED ON YOU
16 FILED A CIVIL COMPLAINT AGAINST HIM. ANY ALLEGATIONS
17 THAT THAT CIVIL CLAIM IS MERITLESS, BASELESS SHOULD BE
18 LITIGATED WITHIN THE CONTEXT OF THAT CIVIL SUIT.

19 MS. TOWNSEND: ABSOLUTELY. YES.

20 THE COURT: SO YOU DON'T NEED TO RESPOND TO THAT.

21 MS. TOWNSEND: OKAY. OKAY. SO THE PROTECTED
22 SPEECH, YOU DON'T NEED ME TO RESPOND TO, AS FAR AS THE
23 COMPLAINT ITSELF?

24 THE COURT: NOT PROTECTIVE SPEECH, JUST IN THE
25 CONTEXT OF CIVIL LITIGATION. I'LL MAKE IT A LITTLE BIT
26 MORE NARROW. HERE ARE THE THINGS THAT I'M CONCERNED
27 ABOUT ONE OF WHICH YOU'VE ALREADY ADDRESSED A LITTLE
28 BIT, IS YOUR PRESENCE AT HIS WORKPLACE. YOUR PRESENCE

1 AT HIS HOME, AND THE SOCIAL MEDIA POST THAT DON'T APPEAR
2 TO HAVE ANYTHING TO DO WITH THE LITIGATION, AND I THINK
3 I MADE REFERENCE TO ONE OF THEM SPECIFICALLY WHEN I
4 DENIED YOUR ANTI-SLAPP MOTION WHICH WAS THE ONE THAT YOU
5 REFERRED TO AS SATIRE, BUT OTHER ONLINE ALLEGATIONS THAT
6 ARE NOT JUST REFERENCING THE FACT THAT YOU HAVE FILED A
7 CIVIL COMPLAINT THAT'S WHAT I'M CONCERNED ABOUT.

8 MS. TOWNSEND: EXCELLENT. OKAY. SO I WILL SKIP
9 OVER THE ITEMS THAT ARE NOT PART OF THE CIVIL COMPLAINT
10 AND JUST DIRECTLY ADDRESS THE ITEMS THAT ARE POSTS, IF
11 THAT MAKES SENSE?

12 THE COURT: YES.

13 MS. TOWNSEND: OKAY. SO LET ME SKIP THROUGH HERE.

14 OKAY. SO, AGAIN, THERE'S, I BELIEVE THIS IS ON
15 THE NEXT PAGE. TIK TOK VIDEOS, NEW TIK TOK VIDEOS IN
16 WHICH SHE AGGRESSIVELY AND DELUSIONALLY CALLS MR. LOPEZ
17 OR ACCUSES MR. LOPEZ, I SHOULD SAY, OF CRIMES AND
18 MISCONDUCT.

19 SO NONE OF THE VIDEOS I HAVE MADE THAT THEY CAN
20 POINT TO ACCUSE HIM OF ANY MISCONDUCT OTHER THAN
21 ALLEGATIONS THAT HAVE ALREADY BEEN MADE IN THE PUBLIC
22 DOMAIN. AND I WAS VERY CAREFUL TO SAY THESE ARE
23 ALLEGATION THAT HAPPENED A LONG TIME AGO, BUT THEY WERE
24 ONLY ALLEGATIONS.

25 I NEVER ONCE SAID HE HAD ASSAULTED ANYONE OR
26 DID ANYTHING CRIMINALLY. I ONLY EVER STATED IN MY POSTS
27 THAT HE WAS ACCUSED OF THINGS. SO I ALWAYS STATE WITHIN
28 THE BOUNDS OF PROTECTED SPEECH.

1 AND FURTHERMORE, THE ONLY OTHER SORT OF
2 ALLEGATION THAT I MADE THAT WAS DIRECTLY ACCUSING
3 MR. LOPEZ OF POTENTIALLY SEXUAL HARASSMENT CAME DIRECTLY
4 FROM THIS INDIVIDUAL, ANGEL MENDEZ. SO HE HAD INFORMED
5 ME THROUGH THE TEXT MESSAGES THAT MR. LOPEZ WAS UNDER
6 INVESTIGATION AT NBC UNIVERSAL, AND HE HAD PROVIDED WHAT
7 I BELIEVE WERE TEXT MESSAGES FROM WHOEVER THAT WOMAN WAS
8 INSINUATING THAT SHE HAD BEEN ASSAULTED BY MR. LOPEZ.

9 SO OUT OF THOSE, THE INFORMATION THAT WAS FED
10 TO ME, I THEN MADE VIDEOS THAT WERE PERTAINING TO THOSE.
11 I ASSUMED THAT THOSE ALLEGATIONS WERE TRUE-AND-CORRECT
12 GIVEN THAT THIS INDIVIDUAL HAD PHOTOS OF HIMSELF WITH
13 MR. LOPEZ.

14 SO IF I KNEW THAT THIS INDIVIDUAL WAS FEEDING
15 ME FALSE INFORMATION, I WOULD HAVE NEVER POSTED ANY OF
16 THESE VIDEOS. AND AGAIN, IT COMPLETELY CONTRADICTS THAT
17 I WOULD BE THE PERSON BEHIND FEEDING MYSELF BAD
18 INFORMATION TO MAKE MYSELF LOOK BAD AND MAKING VIDEOS
19 THAT ARE ACCUSING MR. LOPEZ OF SEXUAL HARASSMENT
20 WITHIN NBC, I WOULD NEVER DO THAT.

21 I HAVE A LOT OF FRIENDS AND COWORKERS THAT HAVE
22 WORKED -- OR WORKED IN NBC. I WORK IN WOMEN IN MEDIA.
23 THE LAST THING I WANT TO DO IS JEOPARDIZE MY
24 RELATIONSHIPS BY MAKING FALSE ALLEGATIONS AND LOOKING
25 CRAZY. SO THOSE WERE THE ONLY VIDEOS IN WHICH I HAD
26 MADE ANY SORT OF ALLEGATIONS.

27 NOW, THERE WAS ALSO -- LET ME FIND THIS. THIS
28 WAS ALSO -- SO LET ME WALK YOU THROUGH A LITTLE BIT OF

1 KIND OF WHAT HAPPENED WITH THE TIMELINE BETWEEN
2 MR. LOPEZ AND I. SO I DISCOVERED IN MARCH OF THIS YEAR
3 THAT HE HAD POSTED WHAT I BELIEVE WAS A DEFAMATORY POST
4 ABOUT ME ON HIS INSTAGRAM ACCOUNT TO THREE MILLION
5 PEOPLE BACK IN JUNE OF LAST YEAR, JUNE 19 TO BE
6 SPECIFIC. I DID NOT DISCOVER THAT UNTIL MARCH OF THIS
7 YEAR. ONCE I DISCOVERED THAT, I WENT ON HIS INSTAGRAM
8 PAGE, AND THIS IS THE ONLY TWO TIMES I DID THAT, AND I
9 SPECIFICALLY SAID, "HOW DARE YOU?"

10 JUNE OF THAT YEAR, I WAS DEEPLY DEPRESSED AND
11 LOSING JOBS, AND I HAD NO IDEA WHY, BUT I BELIEVE IT HAD
12 TO DO WITH THAT POST BEING SEEN BY PEOPLE I WORKED WITH
13 AND THEY CUTOFF ALL BUSINESS COMMUNICATIONS WITH ME BACK
14 IN JUNE OF 2024. SO I -- EXCUSE ME. I, IN MARCH,
15 WAS --

16 THE COURT: THERE'S TISSUES ON BOTH SIDES OF THE
17 TABLE IN CASE YOU NEED THEM.

18 MS. TOWNSEND: YEAH, THANK YOU. I'M FINE. THANK
19 YOU.

20 SO I JUST EXPLAINED TO HIM THAT I LITERALLY WAS
21 CONSIDERING SUICIDE OF JUNE OF LAST YEAR OVER WHAT HAD
22 HAPPENED TO ME, AND IF -- THAT I WAS GRATEFUL. I DIDN'T
23 SEE THEM BACK IN JUNE OF 2024. AND I LEFT THOSE
24 COMMENTS ON HIS INSTAGRAM, AND I NEVER TALKED TO HIM
25 EVER SINCE. I'VE NOT INTERACTED ON ANY OF HIS PAGES.
26 I'VE NEVER DONE ANYTHING TO GO ON ANY OF HIS WIFE, HIS
27 KIDS, OR HIS. I'VE NOT GONE ON ANY OF THEIR SOCIAL
28 MEDIAS. I -- WHAT I DID IS SORT OF A TONGUE-AND-CHEEK

1 FUNNY SORT OF SMEAR CAMPAIGN BECAUSE WHAT I BELIEVED IS
2 SHORTLY AFTER I DISCOVERED, AND I HAD POSTED ON MARIO'S
3 INSTAGRAM THAT HE HAD -- HE HAD PUT ME IN A REALLY BAD
4 SPOT, AND I BASICALLY SAID I WILL FILE A DEFAMATION
5 LAWSUIT AGAINST YOU. I NEVER HARASSED HIM. I NEVER
6 THREATENED VIOLENCE. I JUST POSTED THESE TWO COMMENTS
7 ON HIS INSTAGRAM, AND THAT WAS MY ONLY INTERACTION WITH
8 HIM.

9 AND THEN A FEW DAYS AFTER THAT, SOMEBODY IS ON
10 REDDIT AND USING THE EXACT SAME LANGUAGE IN THIS
11 PETITION CALLING ME OBSESSIVE AND DELUSIONAL, AND THAT I
12 FAKED A MENTAL HEALTH OR THAT I HAVE A MENTAL HEALTH
13 DISORDER. SO THEY WENT ON OR -- I'M SORRY -- REDDIT
14 AND PUT THE COMMENTS THERE.

15 AND THEN NOT LONG THEREAFTER, THE SAME VIDEO
16 THAT MR. LOPEZ USED WAS THEN POSTED TO TWO TIK TOK
17 ACCOUNTS THAT RECEIVED, I BELIEVE, A TOTAL OF 14 MILLION
18 VIEWS, AND ALL OF A SUDDEN IN APRIL I AM BARRAGED WITH
19 HATEFUL COMMENTS AND PEOPLE THREATENING MY LIFE, AND I
20 BELIEVE ALL OF THIS, AGAIN, THE ALLEGATIONS ARE PART OF
21 THE LAWSUIT. I BELIEVE ALL OF THIS WAS FROM MR. LOPEZ.
22 AND THAT'S WHY I ALLEGED A SMEAR CAMPAIGN IN MY LAWSUIT.

23 AND SO, IN A FUNNY TONGUE-AND-CHEEK WAY TO DEAL
24 WITH THE HARASSMENT, I STARTED -- IT WASN'T EVEN REALLY
25 A SMEAR CAMPAIGN. IT WAS JUST A FEW COMMENTS ON REDDIT
26 WHERE I SAID, I JUST MADE FUNNY, SATIRE -- WELL, I SAID,
27 "GETTING AHEAD OF THE DISGUSTING MEDIA PUSH BY MARIO
28 LOPEZ," AND THEN THIS IS IN THE PETITION. I THINK IT

1 MIGHT BE ON PAGE 16 OR 17, THE TOP OF THE PAGE
2 SAYS -- OH, "B, COURSE OF CONDUCT, ONLINE HARASSMENT,
3 DELUSION ALLEGATIONS INVOLVING MARIO LOPEZ." SO LET ME
4 KNOW WHEN --

5 THE COURT: I'M TRYING TO FIND WHERE YOU ARE
6 REFERRING TO. YOU'RE SAYING THIS IS WITHIN THE PETITION
7 ITSELF?

8 MS. TOWNSEND: WITHIN THE PETITION ITSELF, "B,
9 COURSE OF CONDUCT, ONLINE HARASSMENT, DELUSION
10 ALLEGATIONS."

11 THE COURT: OH, YES.

12 MS. TOWNSEND: OKAY. SO ON MARCH 23RD, 2025, I HAD
13 STATED I WAS GETTING AHEAD OF THE DISGUSTING MEDIA PUSH
14 BY MR. LOPEZ AND WOULD BE FILING A DEFAMATION LAWSUIT,
15 AND I COMMENTED, "TWO CAN PLAY AT THIS GAME," AND I USED
16 A CRUDE WORD FOLLOWED BY:

17 "HOW IS YOUR NEW" -- AND AGAIN ANOTHER CRUDE
18 COMMENT, BUT NONE OF THESE COMMENTS ARE THREATENING, AND
19 YOU KNOW, JUST LOOKING ON PRESIDENT, HUSTLER MAGAZINE
20 INCORPORATED VERSUS FALWELL, THE U.S. SUPREME COURT
21 DETERMINED THAT CRUDE IS PROTECTED SPEECH.

22 SO IN HUSTLER MAGAZINE INCORPORATED, THE
23 MAGAZINE FEATURED A PARITY CLAIMING THAT FALWELL, A
24 MINISTER IN THE PUBLIC FIGURE, HAD A DRUNKEN INCESTUOUS
25 RELATIONSHIP WITH HIS MOTHER IN AN outhouse, AND THE
26 COURT ADDED THAT PROTECTING FREE SPEECH SURPASSED
27 PROTECTING PUBLIC FIGURES FROM PATENTLY OFFENSIVE SPEECH
28 SO LONG IT COULD NOT BE REASONABLY CONSTRUED TO STATE

1 FACTS ABOUT THE SUBJECT. SO IN THAT REFERENCE, WHEN YOU
2 LOOK AT WHAT I STATED, "YES IT'S CRUDE," BUT IT WAS NOT
3 THREATENING. IT WAS NOT HARASSING, AND IT WAS SO --
4 SUCH SATIRE AND RHETORICAL THAT NO REASONABLE PERSON
5 WOULD CONSTRUE THIS TO BE FACTS.

6 AND THEN TWO, THE NEXT PARAGRAPH ON MARCH 24TH,
7 I SAID, "NO ONE SEEMS DISTURBED THAT MR." -- I GUESS
8 THAT'S HIS -- I'M NOT SURE WHAT ACCOUNT THIS IS, "MARIO
9 LOPEZ WAS ACCUSED OF IN THE '90S OF RAPING TEENAGE
10 GIRLS," I NEVER SAID THAT HE DID. I SAID HE WAS
11 ACCUSED, AND THIS IS IN THE PUBLIC RECORD. PEOPLE BRING
12 THIS UP CONSTANTLY.

13 AND AS A PUBLIC FIGURE, YOU KNOW, THE
14 ALLEGATIONS ARE SOMETHING THAT I'M SURE HE'S NOT FILED
15 RESTRAINING ORDERS AGAINST ANY OTHER INDIVIDUAL OF THE
16 ACCUSATIONS. BUT AGAIN, I NEVER ACCUSED HIM OF ANY
17 CRIMES. IN FACT, THE WHOLE INVESTIGATION INTO, AS FAR
18 AS I CAN TELL WAS DROPPED. SO LET ME GO ON TO --

19 THE COURT: JUST OUT OF CURIOSITY SINCE YOU'RE
20 MENTIONING IT IN THAT WAY, WHY EVEN MENTION, NO ONE
21 SEEMS DISTURBED THAT HE WAS ACCUSED OF RAPING TEENAGE
22 GIRLS IN THE 90'S IF YOUR ULTIMATE CONCLUSION IS, WELL,
23 NOTHING REALLY HAPPENED WITH THAT AND IT WAS DROPPED.

24 MS. TOWNSEND: BECAUSE, YOUR HONOR, I HAVE BEEN
25 ACCUSED OF FAKING -- FAKING A DISABILITY FOR YEARS. AND
26 WHAT IS VERY DISTURBING TO ME IS THAT THE ALLEGATIONS
27 AGAINST MR. LOPEZ ARGUABLY COULD BE CONSIDERED SEVERE,
28 MORE SEVERE THAN THE ALLEGATIONS AGAINST ME. YET,

1 MR. LOPEZ IS ABLE TO CONTINUE WORKING AND HAVE GAINFUL
2 EMPLOYMENT WHERE I AM NOT. SO LARGELY WHAT I WAS DOING
3 WAS USING THAT TO ESSENTIALLY, ESSENTIALLY COMPARE THE
4 TWO. NOT TO DEFAME HIM, NOT TO HARM HIM IN ANY WAY,
5 SHAPE OR FORM, BUT TO CALL ATTENTION TO BOTH HIM AND
6 MYSELF AND SAY TO THE PUBLIC, LOOK, YOU KNOW, MR. LOPEZ
7 WAS ACCUSED OF THIS, BUT CHARGES WERE DROPPED. I WAS
8 ACCUSED --

9 THE COURT: CHARGES WEREN'T EVEN FILED.

10 MS. TOWNSEND: EXACTLY. I'M SORRY. I APOLOGIZE.
11 CHARGES WERE NEVER FILED. I WAS ACCUSED OF THIS, BUT
12 THERE WAS NEVER AN INVESTIGATION, SO THE PARALLELS OF
13 WHAT IS IMPORTANT HERE.

14 THE COURT: OKAY.

15 MS. TOWNSEND: SO LET ME FIND ANY OTHER --

16 THE COURT: LET ME JUMP BACK TO MARCH 23RD FOR A
17 SECOND. IS THAT THE ONLY TIME THAT YOU MADE REFERENCE
18 TO THAT SPECIFIC ALLEGATION?

19 BECAUSE, I THINK, THERE'S ALSO A POTENTIAL
20 DIFFERENCE BETWEEN THE FOLLOW UP CASE THAT YOU ARE
21 REFERENCING WHICH IS THAT WELL, THEY PUBLISHED ONE
22 THING, ONE CARTOON ONE TIME, AND THAT WAS ABOUT DAMAGES
23 RELATED TO THAT CARTOON. IT'S NOT A RESTRAINING ORDER
24 WHICH IS TO PREVENT ONGOING HARASSMENT A PATTERN OF
25 HARASSMENT, SO --

26 MS. TOWNSEND: SURE.

27 THE COURT: WAS THERE MORE THAN ONE TIME THAT YOU
28 WERE MAKING THOSE KINDS OF ALLEGATIONS?

1 MS. TOWNSEND: THE ALLEGATIONS, AS FAR AS WHAT
2 PIECE, ON THE 23RD?

3 THE COURT: INSINUATING THAT HE HAS A VAGINA.

4 MS. TOWNSEND: THAT WAS ONCE.

5 THE COURT: OKAY.

6 MS. TOWNSEND: THAT WAS ONCE, I BELIEVE. I DON'T
7 BELIEVE THERE WAS ANYMORE. I COULD BE WRONG, BUT I
8 DON'T HAVE ALL OF THE -- IT MAY HAVE BEEN TWICE, BUT
9 THEY WERE AROUND THE SAME TIME.

10 THE COURT: OKAY.

11 MS. TOWNSEND: BUT I CAN'T RECALL BECAUSE I DON'T
12 SEE THE ACTUAL DATES OF THE MESSAGES IN HERE.

13 THE COURT: ALL RIGHT. YEAH, CONTINUE WITH YOUR
14 DIRECT, AND I GUESS COUNSEL KNOWS THAT ON CROSS, AND I'M
15 CURIOUS ABOUT THAT, IF YOU HAVEN'T REACHED IT.

16 MS. TOWNSEND: OKAY. SO I ALSO WANT TO ADDRESS, I
17 THINK THIS IS OKAY. SO THAT PAGE, TWO MORE PAGES
18 FORWARD. LET'S SEE. SIMULTANEOUSLY ON REDDIT USING THE
19 ACCOUNT FUNCTION TINY.

20 THE COURT: I SEE IT.

21 MS. TOWNSEND: OKAY. LET'S SEE. CLAIMS THAT
22 MR. LOPEZ PAID WOMEN FOR SEX AND COMMITTED DATE RAPE. I
23 DEFINITELY DID NOT SAY THAT. THERE'S NO CONTEXT.

24 THE COURT: IS THAT YOUR ACCOUNT NAME?

25 MS. TOWNSEND: YES, IT IS MY ACCOUNT NAME. BUT I
26 DO NOT HAVE ACCESS TO IT ANY LONGER. AND I DON'T KNOW
27 WHAT THAT WAS SPECIFICALLY REFERENCING BECAUSE ALL IT IS
28 IS A QUOTE OF DATE RAPE, SO I'D LIKE TO SEE THE FULL --

1 THE FULL COMMENT TO ACTUALLY SEE WHAT THE CONTEXT WAS
2 BEHIND THAT BECAUSE I FIND IT VERY HARD TO BELIEVE I
3 WOULD EVER SAY ANYTHING THAT HE PAYS WOMEN; ABSOLUTELY
4 WOULD NOT SAY ANYTHING LIKE THAT. AGAIN, SO A LOT OF
5 THESE ARE TAKEN OUT OF CONTEXT, SO THE FULL QUOTE IS NOT
6 IN HERE. AND IT HAS BEEN TAKEN OUT OF CONTEXT. AND --

7 THE COURT: SO I'M GOING TO PAUSE YOU FOR A SECOND.
8 I WOULDN'T NORMALLY DO THIS BECAUSE I DON'T LIKE TO GO
9 BACK AND FORTH, BACK AND FORTH, BACK AND FORTH BETWEEN
10 THE PARTIES. BUT DURING PETITIONER'S CASE IN CHIEF, I
11 FEEL LIKE THE PRIMARY, IF NOT EXCLUSIVE FOCUS JUST ABOUT
12 WAS ON THE SERVICE AT THE HOME BECAUSE IT WAS CLEARLY AN
13 EXTREMELY UPSETTING EVENT TO THE FAMILY.

14 A SINGULAR INCIDENT IS TYPICALLY NOT SUFFICIENT
15 FOR A CIVIL HARASSMENT RESTRAINING ORDER, AND THE COURT
16 DID SEE AT LEAST ALLEGATIONS IN THE PETITION THAT WERE
17 DESCRIBED AS SHE'S GOING THROUGH HERE, AND IN DENYING
18 THE ANTI-SLAPP MOTION WAS CONSIDERING SOME OF THOSE
19 POSTS AS AT LEAST PART OF THE REASON FOR DENYING THAT.

20 I DON'T THINK THAT WE REALLY GOT INTO THE --
21 WHERE THESE CAME FROM AS IN LIKE SCREENSHOTS OF THE POST
22 OR ACTUAL QUOTES OF SOME OF THESE, AND WE REALLY DIDN'T
23 PLAY ANY POSTS, FOR INSTANCE, OF WHERE SHE'S MAKING
24 THESE KINDS OF STATEMENTS.

25 I'M WONDERING IF PETITIONER WOULD LIKE TO
26 REOPEN TO HIGHLIGHT SOME OF THOSE SOCIAL MEDIA POSTS,
27 AND THEN, I THINK, THE RESPONDENT WOULD BE ALSO BETTER
28 ABLE TO RESPOND TO THOSE MORE CONCISELY. IT WOULD BE

1 HELPFUL TO BOTH THE COURT AND TO STREAMLINE HER
2 TESTIMONY, I THINK.

3 MS. KAZARIAN: YES, I DO BELIEVE THAT THEY WERE
4 ATTACHED AS AN EXHIBIT TO THE RESTRAINING ORDER ITSELF,
5 BUT --

6 THE COURT: SO I SAW A TABLE THAT WAS ATTACHED.
7 BUT I'M NOT SURE THAT THE ACTUAL SCREENSHOTS -- NO.
8 THERE WERE NO SCREENSHOTS. AND THERE'S THINGS THAT LOOK
9 LIKE THEY SHOULD BE APPLICABLE LINKS, YOU KNOW, REDDIT
10 POST 8, REDDIT POST 9, THEY'RE NOT APPLICABLE FROM MY
11 END AT LEAST.

12 MS. KAZARIAN: UNDERSTOOD.

13 THE COURT: GIVEN THAT IT'S 2:44, WOULD IT BENEFIT
14 PETITIONER, SO BOTH SIDES REALLY, TO TAKE OUR 15 MINUTE
15 BREAK NOW SO THAT THOSE CAN SORT OF BE LINED UP AND COME
16 BACK?

17 MS. KAZARIAN: SURE.

18 THE COURT: OKAY. LET'S DO THAT.

19 (BRIEF RECESS.)

20 THE COURT: BACK ON THE RECORD ADD-ON NUMBER 2,
21 LOPEZ VERSUS TOWNSEND. SO I SORT OF DIRECTED PETITIONER
22 SO REOPEN IN SOME SENSE.

23 MS. KAZARIAN: YES. AND SO, SPECIFICALLY FOR THE
24 SOCIAL MEDIA POSTS THAT WE REFERENCED IN OUR --

25 THE COURT: YES.

26 MS. KAZARIAN: -- FILING. UNDERSTOOD.

27 THE COURT: I KNOW THAT THEY WERE PRETTY FULLY
28 QUOTED GIVEN SOME CONTEXT, BUT IT IS AS A TABLE, SO IT

1 DOESN'T QUITE HAVE THE FULL CONTEXT, AND SOME OF THEM, I
2 KNOW THEY DIDN'T HAVE THE DATE LISTED BASED OF THE WAY
3 THAT THE SOCIAL MEDIA SITES WORK.

4 MS. KAZARIAN: YES. SO -- OKAY. THIS IS GOING TO
5 BE A CHALLENGE. IN THE TABLE WHICH IS UNFORTUNATELY NOT
6 PAGINATED, THERE IS A MARCH 23RD, 2025 REFERENCE TO AN
7 INSTAGRAM POST. AND YOUR HONOR, CAN WE GET THE ELMO ON
8 THIS?

9 THE COURT: YEAH, GO RIGHT AHEAD.

10 MS. KZARIAN: THIS IS AN INSTAGRAM POST, ONE OF
11 MS. TOWNSEND'S INSTAGRAM ACCOUNTS. THE CAPTION STATES,
12 "TWO CAN PLAY THIS GAME, FUCK FACE, @MARIOLOPEZ, @MARIO
13 LOPEZ VIVA." THERE ARE FOUR MIDDLE FINGER EMOJIS.
14 "HEY, HOW IS YOUR NEW VAGINA, BITCH."

15 THE COURT: IT'S QUOTED A REDDIT POST THAT IT LOOKS
16 LIKE IT WAS MADE BY RESPONDENT AS WELL.

17 MS. KAZARIAN: YES. AND THE TEXT ON THAT IS,
18 "MARIO IS A GIANT DOUCHE BAG. HE HAS VAGINA ENVY.
19 I HEARD THROUGH THE GRAPEVINE THAT HE HAD A VAGINAL
20 REJUVENATION THAT DIDN'T TURN OUT WELL, BUT HE HAD TO DO
21 IT BECAUSE THE ROAST BEEF WAS STARTING TO DRAG TO HIS
22 KNEECAP, AND YOU COULD SEE IT COMING OUT HIS GYM SHORTS.
23 I DON'T KNOW HOW TRUE THIS IS, BUT I BELIEVE IT."

24 THE COURT: OKAY.

25 MS. TOWNSEND: YOUR HONOR, DO YOU WANT ME TO
26 RESPOND TO ANY OF THESE OR --

27 THE COURT: NOT YET. I ASKED THEM TO REOPEN, SO
28 BASICALLY, SHOW ALL OF THESE AND THEN YOU CAN RESPOND.

1 MS. TOWNSEND: OKAY.

2 MS. KAZARIAN: THERE'S AN ADDITIONAL -- THERE'S A
3 TIK-TOK FROM MARCH 18TH. IT'S THE PICTURE OF MR. LOPEZ
4 AND THE CAPTION AND THE ACCOUNT IS NAMED DESIREE
5 TOWNSEND, AND THE ACCOUNT SAYS, "SAYS THE MAN AT MARIO
6 WHO WAS ACCUSED OF SA BY TWO WOMEN ADMITTED TO CHEATING
7 ON HIS WIFE AND WISHES TO BE BFFS WITH ALLEGED RAPIST,
8 ANDRE, A-N-D-R-E, TATE. GREAT CHOICE TO BRING ON YOUR
9 SHOW AT JENNIFER HUDSON SHOW."

10 YOUR HONOR, I CAN KEEP GOING THROUGH THESE
11 PICTURES, BUT AT THIS TIME, BECAUSE THERE'S A REFERENCE
12 TO THE JENNIFER HUDSON SHOW, CAN I BRING UP ANOTHER POST
13 THAT'S NOT REFERENCED IN OUR INITIAL FILINGS OR SHOULD I
14 WAIT FOR CROSS EXAMINATION?

15 THE COURT: I THINK IT'S FINE TO BRING IT UP NOW,
16 GIVE HER MORE TIME TO RESPOND TO IT.

17 MS. KAZARIAN: THE, @JENNIFER HUDSON SHOW IS
18 RELEVANT BECAUSE THERE IS A POST FROM -- I'M NOT SURE
19 EXACTLY WHEN THIS POST WAS MADE. THE SCREEN THREAD SAYS
20 IT WAS THREE DAYS BEFORE, BUT THIS IS IN REFERENCE TO A
21 TICKET TO THE JENNIFER HUDSON SHOW FOR MARCH 20TH, 2025
22 WHEN MR. LOPEZ WAS A GUEST ON THE SHOW.

23 IT IS AN INSTAGRAM POST FROM CHEERLEADER FOR
24 CHANGE WHICH IS DESIREE TOWNSEND, ONE OF HER ACCOUNTS,
25 AND HER CAPTION IS:

26 "HEY, @MARIO LOPEZ VIVA. YOU HAVE NO IDEA WHO YOU
27 FUCKED WITH, MAN. SEE YOU ON THE @JHUD, H-U-D, SHOW.
28 YOU IDIOT. I WILL MAKE YOUR LIFE A LEGAL/PR NIGHTMARE.

1 YOU PIECE OF SHIT, MARIO LOPEZ."

2 THE COURT: WHAT'S THE DATE ON THIS?

3 MS. KAZARIAN: THE DATE ON THIS SAYS THREE DAYS
4 AGO, AND I'M SORRY. I DON'T KNOW WHAT --

5 MS. TOWNSEND: IT'S RIGHT THERE. DO YOU SEE IT?
6 THE DATE THURSDAY, MARCH 20TH, 2025.

7 THE COURT: SO I SEE THE DATE OF THE ACTUAL TICKET
8 ITSELF, AND I GUESS IT WOULDN'T BE UNREASONABLE TO THINK
9 THAT IT COULD HAVE BEEN POSTED ON THE SAME DAY.
10 CERTAINLY I WOULD SAY THAT IT IS EITHER THAT DAY OR
11 EARLIER.

12 MS. KAZARIAN: RIGHT. I WILL RETURN NOW TO THE
13 RELEVANT POSTS FROM OUR POSTING AND FROM OUR FILING.
14 I'M SORRY. THERE IS ANOTHER REFERENCE TO THE JENNIFER
15 HUDSON SHOW. THIS WAS ALSO REFERENCED IN THE TABLE.
16 THIS IS A TIK-TOK FROM 3/18, "MARIO LOPEZ ACCUSED OF,"
17 AND THE WORD SEXUALLY IS BLOCKED OFF ONLY, A-L-L-Y, IS
18 VISIBLE.

19 "ASSAULTING TWO WOMEN IN THE 1990S, ADDITIONALLY,
20 CHEATED ON HIS WIFE. HUGS ACCUSED TRAFFICKER ANDREW
21 TATE IN LAS VEGAS'S AT UFC EVENT STATED THAT THE FREE
22 BRITTANY MOVEMENT HAD BLOOD ON THEIR HANDS FREEING HER
23 FROM A FORCED CONSERVATORSHIP." AND THE COMMENT IS:

24 "THE PYRAMID OF CANCEL CULTURE LARGELY PROTECTS
25 THOSE AT THE VERY TOP. SEE YOU TONIGHT AT THURSDAY'S
26 TAPING AT JENNIFER HUDSON SHOW."

27 THE COURT: OKAY. THAT LOOKS LIKE THE DATE
28 ACTUALLY WAS 3/18?

1 MR. TAPETILLO: YES.

2 THE COURT: OKAY.

3 MS. KAZARIAN: THIS IS ANOTHER POST FROM 3/18,
4 TIK TOK, WHICH AGAIN, REFERENCES THAT SHE IS GOING TO
5 SEE HIM AT THE JENNIFER HUDSON TAPING.

6 THE COURT: WELL, LET ME FINISH LOOKING AT THAT ONE
7 BECAUSE IT SEEMS LIKE IT WAS MEANT TO BE KIND OF A
8 COMPANION TO THE LAST POST. SOMETIMES IT JUST TAKES A
9 SECOND. OKAY. SO ASIDE FROM MENTIONING, "SEE YOU AT
10 THURSDAY'S TAPING," SHE'S OTHERWISE, HIGHLIGHTING
11 SEEMINGLY THAT SHE WAS CANCELLED JUST BY BEING SICK WITH
12 AN AUTO-IMMUNE DISEASE CALLED STIFF PERSON SYNDROME, AND
13 THAT JENNY MCCARTHY USED HER TO GET DONATIONS, AND THAT
14 JENNY MCCARTHY CONTINUES ANTI-VACS EFFORTS AND IS
15 PROTECTED BY HOLLYWOOD. OKAY.

16 MS. KAZARIAN: THIS IS A POST FROM -- IT'S FROM
17 TIK TOK, NOT -- UNFORTUNATELY I DON'T HAVE A DATE ON
18 THIS. I BELIEVE THIS IS FROM MAY 31ST. THIS IS A
19 TIK-TOK THAT REPOSTS MARIO LOPEZ'S MAYBE INSTAGRAM WHERE
20 HE SAYS:

21 "WE DON'T UNDERSTAND GOD'S PLAN, BUT HE
22 UNDERSTANDS US." AND MS. TOWNSEND POSTS, "STAY STRONG.
23 HOLD ON. TRUST GOD. GOD'S PLAN WON'T SAVE YOU FROM THE
24 CONSEQUENCES, MARIO. GOD'S SOLDIERS WEAR HEELS, FILES
25 LAWSUITS AND NEVER MISSES THE MARKS," AND THE COMMENT,
26 THE CAPTION AT THE BOTTOM IS,

27 "YOU'RE THE NEXT MARK IN GOD'S WAR AGAINST
28 HOLLYWOOD."

1 THE COURT: SO I CAN'T SEE THAT. IF YOU WANT TO
2 MOVE IT UP JUST A LITTLE BIT. OKAY. OKAY.

3 MS. KAZARIAN: AND THE REST OF THESE ARE --

4 THE COURT: GO AHEAD.

5 MS. KAZARIAN: I'M SORRY. THE REDDIT COMMENTS THAT
6 ARE MENTIONED IN THE FILING, AND I THINK THIS IS WHERE
7 MOST OF THE REFERENCES ARE. THIS IS A REDDIT POST.
8 UNFORTUNATELY, REDDIT DOESN'T SHOW THE DATES. IT JUST
9 SAYS HOW LONG AGO THEY WERE POSTED.

10 THE COURT: IS THIS HOW IT CURRENTLY APPEARS,
11 THOUGH? IS THIS A SCREENSHOT?

12 MS. KAZARIAN: THIS A SCREENSHOT I TOOK OF HOW IT
13 CURRENTLY APPEARS, SO THIS IS THE SCREENSHOT OF THE
14 REDDIT PAGE.

15 THE COURT: SO FOUR MONTHS AGO IS ACCURATE TODAY?

16 MS. KAZARIAN: YES.

17 THE COURT: OKAY. THAT'S WHERE I WAS GETTING AT.
18 OKAY.

19 MS. KAZARIAN: FUNCTION TINY, 1302 IS AN ACCOUNT
20 THAT MS. TOWNSEND REPEATEDLY IDENTIFIES HERSELF ON.
21 THIS POST SAYS, "MARIO LOPEZ WHEN HE ALLEGEDLY HAD TO
22 PAY WOMEN TO HAVE SEX WITH HIM AFTER HE ALLEGEDLY
23 RESORTED TO DATE RAPE ACCORDING TO THE TWO WOMEN
24 ACCUSERS FROM THE 1990S." IT GOES ON, BUT THE POINT OF
25 THIS IS, THERE ARE REFERENCES TO MS. TOWNSEND ACCUSING
26 HIM OF PAYING WOMEN TO HAVE SEX WITH HIM.

27 THE COURT: ONE OF THE ALLEGED ACCUSERS WAS A
28 CREDIBLE WITNESS THAT HAD WAITED TOO LONG TO GO TO THE

1 POLICE THUS THE DA DROPPED THE CHARGES, AND HE IS
2 FRIENDS WITH ANDREW TATE TOO. OKAY.

3 MS. KAZARIAN: THAT'S THE ENTIRE POST OF THE
4 COMMENT UNDER THIS VIDEO OF AN OLD SAVED BY THE BOOK,
5 BUT --

6 THE COURT: RIGHT.

7 MS. KAZARIAN: THIS IS A POST FROM FIVE MONTHS AGO
8 WHERE SOMEBODY IS COMMENTING ON A THREAD SAYS:

9 "THIS GIRL IS A TOTAL LUNATIC." ANOTHER PERSON
10 ASKS, "THAT POSTER, DESIREE?" WITH A QUESTION MARK, AND
11 MS. TOWNSEND'S REDDIT ACCOUNT RESPONDS, "YES, IT'S ME,
12 AND WHOEVER-WISE UNDERSCORE RECEPTION 5478 IS, I'M
13 WILLING TO BET HE OR SHE IS PART OF MARIO LOPEZ'S PR
14 TEAM THAT HAS GONE ON AN ASTRO-TURFING RAMPAGE TO DEFAME
15 ME AGAIN TO GET AHEAD OF MY LAWSUIT AGAINST HIM."

16 THE COURT: OKAY. THANK YOU.

17 MS. KAZARIAN: THIS IS A POST FROM FIVE MONTHS AGO
18 FROM TODAY. THIS WAS A SCREENSHOT FROM TODAY.

19 THE COURT: ALL RIGHT. SO THAT'S THE SAME ONE THAT
20 WAS QUOTED IN THE OTHER POST, SO WE'VE SEEN THIS BECAUSE
21 IT WAS REPOSTED BY HER IN A DIFFERENT SOCIAL MEDIA
22 CONTEXT.

23 MS. KAZARIAN: THIS ONE THAT MARIO IS A GIANT
24 DOUCHE BAG?

25 THE COURT: YES.

26 MS. KAZARIAN: I HAVE -- OH, I SEE.

27 THE COURT: I THINK THE FIRST ONE, ACTUALLY.

28 MS. KAZARIAN: I THINK YOU'RE RIGHT. I'M SORRY.

1 THERE'S SO MANY THAT I SOMETIMES I LOSE MAY PLACE. HERE
2 IS ONE FROM FIVE MONTHS AGO. I DON'T THINK THAT WE'VE
3 SEEN, A REDDIT POST:

4 "MARIO LOPEZ IS SUCH A GIRL. I HEARD A RUMOR
5 THAT HE HAD VAGINAL REJUVENATION A FEW YEARS AGO. HIS
6 WIFE WAS APPARENTLY COMPLAINING THAT HIS WAS STARTING TO
7 LOOK LIKE ROAST BEEF, BUT WHO KNOWS HOW TRUE THIS IS. I
8 WISH TMZ WOULD LOOK MORE INTO THIS."

9 THE COURT: SO THAT WAS FIVE MONTHS AGO, SO THAT
10 WOULD HAVE BEEN MARCH OF THIS YEAR?

11 MS. KAZARIAN: YES. THIS IS A REDDIT POST FROM
12 FIVE MONTHS AGO AGAIN. THERE IS A LOT OF LANGUAGE ABOUT
13 HER MEDICAL CONDITION. TOWARDS THE END IT SAYS:

14 "MARIO, HEY, I WONDER WHERE I CAN GET THE
15 INVESTIGATIVE REPORT INTO YOUR RAPE ALLEGATIONS FROM
16 1993. I BET I CAN GET SOME REAL INTERESTING DETAILS
17 FROM THAT. YOU HAS-BEEN D-LIST ACTOR."

18 THE COURT: OKAY. THIS IS --

19 MS. KAZARIAN: THIS IS FROM FIVE MONTHS AGO.
20 MS. TOWNSEND WRITES ON REDDIT.

21 "YOU HAVE NO IDEA THE HELL I'VE BEEN THROUGH.
22 I HAVE THOUGHT ABOUT SUICIDE SO MANY TIMES, I CANNOT
23 EVEN COUNT INCLUDING BACK IN JUNE OF LAST YEAR WHEN I
24 LOST BUSINESS OPPORTUNITIES NOT -- NO, IT WAS BECAUSE
25 MARIO LOPEZ THROUGH HIS INSTAGRAM DEFAMED ME TO MILLIONS
26 OF FOLLOWERS."

27 SHE REPOSTED THE ALLEGEDLY DEFAMATORY POST, AND
28 SAYS, "THEN IF THAT WAS NOT ENOUGH, THREE DAYS LATER I

1 DISCOVERED HE DEFAMED ME LAST YEAR AND CALLED HIM OUT.
2 HE COMES ON HERE UNDER TOP STRATEGY 1, 2, 6, ONE TO
3 CONTINUE DEFAMING ME IS BEYOND TRIGGERING," AND THEN
4 REPOSTS THE INSTAGRAM AS WELL.

5 THE COURT: OKAY.

6 MS. KAZARIAN: AND I BELIEVE THOSE ARE THE MOST
7 RELEVANT ONES.

8 THE COURT: OKAY.

9 MS. TOWNSEND: IS IT POSSIBLE TO GO BACK TO -- CAN
10 I RESPOND? CAN WE GO BACK TO SOME OF THE MESSAGES?

11 THE COURT: WELL, YOU CAN RESPOND TO THEM.

12 MS. TOWNSEND: OKAY. OKAY. I'LL TRY TO RECALL THE
13 MESSAGES, BUT LET ME TRY TO KIND OF MAKE YOU UNDERSTAND
14 THE GENERAL THEME THAT I WAS ATTEMPTING TO DO.

15 SO MR. LOPEZ HAD POSTED THIS DEFAMATORY POST
16 ABOUT ME, AND AGAIN, I DIDN'T DISCOVER IT UNTIL MARCH,
17 AND THREE DAYS AFTER THAT, SOME INDIVIDUAL GOES ON TO
18 REDDIT AND BEGINS A CAMPAIGN, I BELIEVE, OR COMMENTS
19 THAT ARE AGAIN CALLING ME DELUSIONAL, UNHINGED, SAYING
20 I'M OBSESSED WITH MR. LOPEZ, EVERYTHING THAT APPEARS TO
21 BE MADE AGAIN HERE IN THIS PETITION; AND SO, LARGELY
22 WHAT I WAS TRYING TO DO IS DIFFUSE THE SITUATION THROUGH
23 HUMOR.

24 SO JIMMY KIMMEL, FOR EXAMPLE, WAS ACCUSED OF
25 BEING ON EPSTEIN'S ISLAND BY AARON RODGERS, AND WHAT
26 JIMMY KIMMEL DID WAS FUNNY SEGMENTS TO MAKE THE
27 SITUATION LIGHT-HEARTED TO DIFFUSE IT AND NOT TO BE
28 RETALIATORY. SO LARGELY WHAT I WAS ATTEMPTING TO DO --

1 THE COURT: WHAT DID JIMMY KIMMEL DO TO DIFFUSE
2 THAT SITUATION?

3 MS. TOWNSEND: I BELIEVE HE DID SEVERAL SEGMENTS
4 WHERE HE MADE FUN OF AARON ROGERS IN SEVERAL DIFFERENT
5 WAYS SIMILARLY TO THIS. SO MADE FUN OF AARON ROGERS
6 THE WAY HE DANCED, OTHER ALLEGATIONS. I DON'T KNOW IF
7 THERE WERE ANY ALLEGATIONS. I CAN'T EXACTLY RECALL, BUT
8 IT WAS LARGELY USED TO DIFFUSE A TENSE SITUATION. SO
9 WHAT I WAS ATTEMPTING TO DO WAS, ONE, AS YOU SAW, CALL
10 OUT THE HYPOCRISY OF CANCEL CULTURE, RIGHT, BECAUSE YOU
11 HAVE AN INDIVIDUAL, MARIO LOPEZ, WHO YOU KNOW, HAD PAST
12 ALLEGATIONS BROUGHT AGAINST HIM AS A PUBLIC FIGURE.

13 THESE ARE MATTERS OF PUBLIC CONCERN; AND SO, I
14 USED THESE EXAMPLES TO COMPARE TO MYSELF AS SOMEBODY WHO
15 HAD ALLEGATIONS BROUGHT AGAINST ME TO LARGELY COMPARE
16 HOW WE ARE TREATED RESPECTIVELY IN THE MEDIA AND THE
17 PUBLIC REALM.

18 SO LARGELY WHAT THESE POSTS WERE ATTEMPTING TO
19 DO, AND THAT IS WHAT WAS THE TITLE OF THESE ARE
20 HYPOCRISY OF CANCEL CULTURE IS ATTEMPTING TO LET PEOPLE
21 LOOK AT THE DISPARITY BETWEEN HOW WOMEN AND MEN ARE
22 TREATED IN THE MEDIA. SO LARGELY, THAT WAS PIECE 1 WAS
23 TO CALL OUT THE DISCREPANCY.

24 PIECE 2 WAS TO DIFFUSE THE SITUATION THROUGH
25 HUMOR. SO GIVEN THAT WHAT I -- AGAIN, THESE ARE PART OF
26 THE ALLEGATIONS I MADE IN THE DEFAMATION SUIT WAS THAT I
27 BELIEVED MR. LOPEZ WAS BEHIND A SMEAR CAMPAIGN; AND SO,
28 AGAIN TO DIFFUSE THE SITUATION, I DID A FUNNY TAKE OF

1 THAT SMEAR CAMPAIGN FIVE MONTHS AGO.

2 SO THESE ONE-TIME EVENTS FROM FIVE MONTHS AGO
3 HAVE NOT BEEN REPEATED AND WERE ONLY MEANT TO SERVE AS A
4 WAY TO DIFFUSE THE SITUATION IN A FUNNY LIGHT, DEFEND
5 MYSELF, AND THEY WERE NOT EVER MEANT TO BE DIRECT
6 ATTACKS ON HIM. AT THE TIME I WAS BEING ATTACKED ONLINE
7 BY MULTIPLE INDIVIDUALS.

8 THE COURT: SO I JUST WANT TO UNDERSTAND, WHEN YOU
9 POSTED THAT HE ALLEGEDLY PAID WOMEN FOR SEX AND THEN
10 AFTER THAT ALLEGEDLY RESORTED TO DATE RAPE, THAT'S MEANT
11 TO BE A FUNNY JOKE?

12 MS. TOWNSEND: NO. THAT IS NOT MEANT TO BE A FUNNY
13 JOKE, AND I WANTED TO ADDRESS THAT COMMENT BECAUSE THOSE
14 ARE SERIOUS ALLEGATIONS IN THERE.

15 THE COURT: THAT WAS IN THE APRIL OF 2025. AND I
16 JUST ALSO WANT TO POINT OUT THAT SOME OF THIS WAS IN
17 MARCH AND SOME OF THIS WAS IN APRIL. I DON'T THINK YOU
18 CAN CALL SOMETHING A ONE-TIME INCIDENT WHEN IT HAPPENS
19 TWO MONTHS APART.

20 MS. TOWNSEND: I DON'T KNOW. I DIDN'T SEE THE
21 EXACT DATE OF THAT PARTICULAR COMMENT.

22 THE COURT: ONE SAID FOUR MONTHS AND ONE SAID FIVE
23 MONTHS.

24 MS. TOWNSEND: SURE. THEN THEY WERE A MONTH APART.
25 SO THAT PARTICULAR COMMENT, AGAIN, I NEVER ACCUSED HIM
26 OF ANYTHING. I'M REPEATING ALLEGATIONS THAT I HAD FOUND
27 ONLINE, SO A LOT OF THESE --

28 THE COURT: TELL ME, WHERE YOU DID YOU FIND THE

1 ALLEGATIONS THAT HE WAS PAYING WOMEN FOR SEX?

2 MS. TOWNSEND: SO THESE ALLEGATIONS WERE ON REDDIT.
3 SO I CAN ATTEMPT TO FIND IT. BUT THESE ALLEGATIONS WERE
4 ON REDDIT. I FOUND OTHER -- AGAIN, I DON'T KNOW THE
5 TRUTH OF THESE WHICH IS WHY THEY WERE STATED AS
6 ALLEGATIONS. I DON'T KNOW THE TRUTH. I'M SIMPLY
7 REPEATING THE THINGS THAT I HAD SEEN ONLINE. I NEVER
8 ONCE STATED THEY WERE FACTS. I ONLY EVER REPEATED THE
9 ALLEGATIONS THAT I SAW. AND MR. LOPEZ IS A PUBLIC
10 FIGURE. THESE ALLEGATIONS ARE THROUGH THE INTERNET. I
11 ONLY REPEATED THE ALLEGATIONS THAT I HAD SEEN ONLINE. I
12 CAN'T TELL YOU EXACTLY WHERE, BUT EVEN THE -- THE
13 ALLEGATION IN THAT PARTICULAR POST THAT YOU'RE
14 REFERENCING IS MENTIONED THAT THERE WERE CREDIBLE
15 WITNESS.

16 SO IF YOU READ THE NEWS ARTICLE FROM 1993,
17 IT DID STATE IN THERE, THE INVESTIGATOR DID SAY THAT HE
18 BELIEVED THAT THERE WAS A CREDIBLE WITNESS, ONE OF THE
19 WOMEN WAS A CREDIBLE WITNESS. SO IN THAT NEWS
20 ARTICLE --

21 THE COURT: OKAY. WAS THAT ARTICLE SITED IN YOUR
22 RESPONSE?

23 MS. TOWNSEND: NO. YOU COULD -- I GUESS YOU WOULD
24 HAVE TO GOOGLE IT. I DIDN'T EXPECT TO ME TO BRING THE
25 ARTICLE, BUT IF YOU GOOGLE 1993, I BELIEVE IT'S VANITY
26 FAIR. IT'S THE MARIO LOPEZ ALLEGATIONS OF -- IT'S IN
27 THERE. IT DISCUSSES THAT THE TWO OR ONE OF THE WOMEN
28 WAS BELIEVED TO BE CREDIBLE, SO I WAS SIMPLY REPEATING

1 WHAT WAS IN A NEWS ARTICLE HERE. LET ME FIND IT.

2 MS. KAZARIAN: YOUR HONOR, I'M GOING TO OBJECT TO
3 RELEVANCE AS TO THAT BECAUSE I DON'T BELIEVE THAT -- I
4 THINK WE'VE GONE A LITTLE BIT OFF THE RESERVATION WHEN
5 IT COMES TO EXACTLY WHAT SHE'S POSTING. I BELIEVE THAT
6 THE QUESTION IS, IS HER BEHAVIOR CONCERNING TO MR. LOPEZ
7 AND HIS FAMILY IN TOTALITY?

8 THE COURT: IT'S NOT JUST THAT, THOUGH. SO SOME OF
9 THE THINGS THAT YOU'RE POINTING TO, EVEN THE POST THAT
10 YOU CHOSE TO HIGHLIGHT, SOME OF THEM I DIDN'T FIND TO BE
11 ALL THAT PERSUASIVE BECAUSE THEY'RE DISCUSSING
12 LITIGATION AND HER PLAN FOR A LITIGATION. I DON'T FIND
13 THAT TO BE IN HERE MADE HARASSING ESPECIALLY WITH THE
14 PUBLIC FIGURE THAT SHE IS PURSUING A LAWSUIT AGAINST
15 THINGS THAT ARE FALSE, THAT IS MORE CONCERNING
16 ESPECIALLY KNOWINGLY FALSE.

17 MS. KAZARIAN: WELL, FOLDED INTO THOSE STATEMENTS
18 THAT SHE'S MAKING ARE ALLEGATIONS THAT MR. LOPEZ IS
19 INVOLVED IN A COORDINATED EFFORT TO CANCEL HER. AND I
20 THINK THAT'S ACTUALLY THE MORE CONCERNING ISSUE IS THAT
21 SHE IS OPERATING UNDER THE DELUSION THAT MR. LOPEZ
22 IS -- AND MAYBE THIS ISN'T THE APPROPRIATE TIME FOR
23 ARGUMENT, BUT I'M OBJECTING BECAUSE I DO THINK THOSE
24 POSTS ARE RELEVANT TO SHOW THAT SHE IS FIXATING ON
25 MR. LOPEZ AND STATING THAT HE, ALONG WITH NBC AND ALONG
26 WITH PARAMOUNT ARE ENGAGING IN A CONCERTED EFFORT TO
27 CANCEL HER AND TO SILENCE HER BASED ON ONE POST THAT
28 MR. LOPEZ REPOSTED THAT DIDN'T EVEN -- HE NEVER SAID HER

1 NAME.

2 THERE'S ONE SOCIAL MEDIA POST, AND FROM THAT
3 THERE HAVE BEEN MONTHS AND MONTHS AND MONTHS AND MONTHS
4 OF FIXATION BY MS. LOPEZ -- BY MS. TOWNSEND.

5 THE COURT: I MEAN, THAT'S BASICALLY THE SUBJECT OF
6 HER CIVIL SUIT, AND WE'RE NOT GOING TO CUT OFF HER CIVIL
7 SUIT IN THESE RESTRAINING ORDER PROCEEDINGS. I DON'T
8 FIND IT HARASSING THAT SHE IS SAYING THAT SHE THINKS
9 THAT THEY'RE TRYING TO SILENCE HER. I'M NOT GOING TO
10 MAKE A FINDING OF HARASSMENT BASED ON HER BELIEF THAT
11 THAT IS THE CASE, AND WE'RE NOT GOING TO FULLY LITIGATE
12 WHETHER OR NOT THAT IS THE CASE BECAUSE, AGAIN, THAT IS
13 PART OF HER CIVIL CASE AND ANY COUNTER CLAIMS THAT WOULD
14 COME OUT OF THAT. SO HE INITIATED THIS LAWSUIT.

15 SO I'M LOOKING AT WHAT IS HARASSING TO HIM,
16 WHAT IS DIRECTED AT HIM. HER SAYING THAT SHE THINKS
17 THAT THEY ARE TRYING TO SILENCE HER, I DO NOT FIND
18 PERSUASIVE IN THAT VANE.

19 MS. KAZARIAN: I UNDERSTAND. I WOULD JUST LIKE THE
20 COURT TO TAKE IT TO INFORM WHETHER HE AND HIS FAMILY
21 HAVE A REASONABLE FEAR OF HER ONCE SHE APPEARS AT HIS
22 WORK, AND ONCE SHE ULTIMATELY APPEARS AT HIS HOUSE.

23 THE COURT: OKAY.

24 MS. TOWNSEND: SO YOU DO NOT WANT TO SEE THE
25 CREDIBLE COMMENT?

26 THE COURT: I DO, BECAUSE I AM CONCERNED ABOUT WHEN
27 YOU ARE REPOSTING THINGS OR POSTING THINGS AND SAYING
28 THAT THEY ARE COMING FROM SOURCES THAT YOU CLAIM YOU'RE

1 GOING TO BE VERY CAREFUL ABOUT SITING TO THINGS LIKE
2 THIS BECAUSE YOU WOULD ONLY --

3 MS. TOWNSEND: MAY I SHOW YOU?

4 THE COURT: YES.

5 MS. TOWNSEND: SO THIS IS THE ARTICLE I WAS
6 SPECIFICALLY REFERRING TO FROM VARIETY. HOLD ON. IT
7 SAYS: "ASSAULT CHARGES DROPPED AGAINST LOPEZ." AND
8 THEN LET ME SCROLL DOWN. AND I'LL READ THIS. "THE
9 WOMEN APPEARED CREDIBLE. LONGANBACH SAID, "BUT THE FACT
10 THAT SHE HAD NOT REPORTED THE INCIDENT FOR 18 MONTHS,
11 AND THE LACK OF PHYSICAL EVIDENCE PREVENTED THE FILING
12 OF CRIMINAL CHARGES, HE SAID," SO --

13 THE COURT: THAT IS LONGANBACH?

14 MS. TOWNSEND: I BELIEVE THAT WAS THE INVESTIGATOR
15 INTO THE RAPE ALLEGATIONS. OH, NO. I'M SORRY. NO. HE
16 WAS THE DEPUTY DISTRICT ATTORNEY, PETER LONGANBACH,
17 SO -- OKAY. SO WHEN I MADE, THOSE, THE COMMENT, I WAS
18 PULLING FROM THIS ARTICLE AND FROM OTHER COMMENTARY
19 ONLINE.

20 THE COURT: SO THE SAME DA IS ALSO SAYING THERE
21 WERE STATEMENTS FROM WITNESSES THAT CONTRADICTED SOME OF
22 THE WOMEN'S ACCOUNTS?

23 MS. TOWNSEND: CORRECT. I WAS ONLY REFERRING TO
24 REPORTING TO ONE PIECE OF THE ARTICLE; BUT AGAIN, HE'S A
25 PUBLIC FIGURE, AND MATTER OF PUBLIC CONCERN THAT WAS
26 SIMPLY WHAT I WAS RAISING IN MY DEFENSE TO SHOW THE
27 DIFFERENCES IN HOW THE MEDIA TREATS CERTAIN INDIVIDUALS,
28 MEMBERS AS WOMEN, SO IT'S LARGELY WHAT I WAS DOING IT

1 FOR. IF I MAY, I'D LIKE TO ADDRESS THE JENNIFER -- I
2 CAN'T REMEMBER HER NAME.

3 THE COURT: HUDSON.

4 MS. TOWNSEND: YES, JENNIFER HUDSON. SO I NEVER
5 HAD ANY INTENTION OF GOING TO JENNIFER HUDSON. I WASN'T
6 EVEN IN THE STATE AT THE TIME, AND I CAN SHOW YOU PROOF
7 THAT I WAS OUT OF STATE.

8 THE COURT: THEN WHY GET THE TICKET AND PRETEND
9 LIKE YOU'RE GOING?

10 MS. TOWNSEND: IT WAS ALL A JOKE. THIS WAS ALL TO
11 DIFFUSE THE SITUATION. THIS WAS TO MAKE A FUNNY
12 LIGHT-HEARTED SITUATION OUT OF SOMETHING THAT WAS SO
13 DAMAGING TO ME, TO SHOW THE CONTRAST BETWEEN WHAT IS
14 DEFAMATORY AND WHAT'S FUNNY AND LIGHT-HEARTED, AND IN
15 HOW YOU SHOULD BE DEALING WITH PEOPLE.

16 YOU DO NOT NEED TO BE ENGAGING IN A SMEAR
17 CAMPAIGN. YOU CAN TAKE ANY DESCENDING VIEWS OR
18 ARGUMENTS AND YOU CAN TURN IT AND FLIP IT INTO SOMETHING
19 LIGHT-HEARTED AND FUNNY, YET, STILL, YOU KNOW, HOW -- I
20 DON'T KNOW HOW TO DESCRIBE THIS, BUT HONESTLY, IT'S
21 LARGELY WHAT I SAW JIMMY KIMMEL DO.

22 I SAW WHAT HAPPENED WITH AARON ROGERS, AND I
23 TRIED TO EMULATE THIS SORT OF SITUATION TO DIFFUSE IT TO
24 MAKE MYSELF NOT LOOK LIKE A VICTIM AND NOT MAKE
25 MR. LOPEZ LOOK BAD NECESSARILY EITHER, BUT MORE AS A
26 FUNNY SORT OF SITUATION, MORE LIGHT-HEARTED. I WAS NOT
27 TRYING AT ANY POINT TO CAUSE HARM.

28 AND THEN I CAN SHOW YOU PROOF THAT I WAS NOT

1 EVEN IN THE STATE DURING THAT TIME. SO I BELIEVE THE
2 SHOW WAS -- I WROTE IT DOWN HERE, MARCH 18, I BELIEVE,
3 OR I THINK THAT IS WHEN THE SHOW WAS. ONE SECOND. LET
4 ME CONFIRM THAT. I BELIEVE IT WAS IN MARCH. SO LET ME
5 SHOW --

6 THE COURT: I DON'T ACTUALLY NEED YOU TO PROVE THAT
7 YOU WEREN'T THERE.

8 MS. TOWNSEND: I WAS IN A COMPLETELY DIFFERENT
9 STATE AT THE TIME FOR SEVERAL MONTHS.

10 THE COURT: OKAY.

11 MS. TOWNSEND: SO I HAD NO INTENTION GOING AGAIN.
12 THIS WAS JUST TO DIFFUSE THE SITUATION, MAKE IT MORE
13 LIGHT-HEARTED WHILE STILL DEFENDING MYSELF IN THE
14 PROCESS, SO I HAD NO INTENTION OF GOING TO THE JENNIFER
15 HUDSON SHOW. I WAS NOT EVEN IN THE STATE OF CALIFORNIA
16 AT THAT TIME.

17 AND THEN FURTHERMORE, THE -- THE REFERENCE TO
18 TOP STRATEGY 1261 IN WHICH I'M COMMENTING BACK ON THAT
19 ASSUMING IT'S MARIO. THIS IS AGAIN LIKE YOU SAID, IT'S
20 ALL PART OF THE DEFAMATION LAWSUIT BECAUSE I PUT IN
21 THERE ALLEGATIONS THAT I BELIEVE HE WAS BEHIND THIS
22 REDDIT SMEAR CAMPAIGN, AND YOU KNOW, AGAIN, THE LARGE
23 PORTIONS OF THE PETITION MIMIC THE EXACT SAME LANGUAGE
24 AS TO WHAT WAS POSTED ON REDDIT.

25 THE COURT: OKAY.

26 MS. TOWNSEND: IS THERE ANYTHING ELSE YOU
27 SPECIFICALLY WANTED ME TO ADDRESS THE COURT?

28 THE COURT: EXPLAIN WHY YOU WENT TO HIS HOUSE AND

1 RECORDED THE SERVICE OF PROCESS AND POSTED IT ON
2 TIK TOK, YOU SPOKE TO HIS SON.

3 MS. TOWNSEND: I ACTUALLY DID NOT SPEAK TO HIS SON,
4 NOT DIRECTLY. I WAS SPEAKING TO THE WRESTLING COACH.
5 SO I HAD TRIED TO FIND A PROCESS SERVER.

6 MS. KAZARIAN: YOUR HONOR, I'M SORRY. AT THIS
7 POINT MAY I ASK PEOPLE IN THE AUDIENCE TO LEAVE BECAUSE
8 IT SEEMS LIKE THEY MAY POTENTIALLY BE REBUTTAL
9 WITNESSES?

10 THE COURT: SURE. COURTNEY LOPEZ HAS EXITED THE
11 COURTROOM.

12 MS. KAZARIAN: THANK YOU. I WOULD ASK THAT IF
13 MR. MARIO LOPEZ IS AUDITING THIS ON COURT CONNECT THAT
14 HE LOG OFF AS WELL.

15 THE COURT: OH, I DIDN'T KNOW.

16 MS. KAZARIAN: OR ACTUALLY --

17 THE CLERK: NO. THERE'S NEVER BEEN A REGISTRATION
18 UNDER THAT NAME, AND I HAVE NOT SEEN HIM IN PARTICULAR
19 COME IN.

20 MS. KAZARIAN: OKAY. I ACTUALLY THINK THE
21 TESTIMONY WAS THAT HE WASN'T PRESENT FOR THAT
22 CONVERSATION, SO --

23 THE COURT: THERE WAS A REGISTRATION UNDER YOUR
24 NAME FOR COURT CONNECT.

25 MS. KAZARIAN: THAT MIGHT HAVE BEEN THIS MORNING,
26 YOUR HONOR, WHEN I WAS REGISTERING FOR ALL OF MY
27 HEARINGS THIS MORNING.

28 THE CLERK: ACCORDING TO THIS, YOU'RE ACTUALLY IN

1 THE HEARING.

2 MR. TAPETILLO: IT'S SOMEONE FROM OUR OFFICE.

3 THE COURT: OKAY.

4 MS. KAZARIAN: THANK YOU.

5 MS. TOWNSEND: OKAY. SO I HAD TRIED TO FIND AN
6 INDIVIDUAL TO PROCESS SERVE MARIO LOPEZ, AND GIVEN THAT
7 HE IS A CELEBRITY, IT IS NOT EASY TO GET A PROCESS
8 SERVER. I WORK IN P.I. SO I DO PERSONAL INJURY
9 LITIGATION. I SEND OUT PROBABLY DOZENS OF PROCESS
10 SERVING REQUESTS EVERY WEEK. AND WITH MR. LOPEZ, THE
11 INDIVIDUAL THAT NEEDED TO PROCESS SERVE HIM NEEDED TO
12 NOT GO THERE JUST ONCE. THEY HAD TO SIT THERE FOR HOURS
13 POTENTIALLY UNTIL THEY COULD SEE SOMEBODY TO SERVE, AND
14 NOBODY WANTED TO DO THAT.

15 AND FURTHERMORE, GIVEN HIS BEING HIGH-PROFILE
16 AND POTENTIALLY BRINGING A RESTRAINING ORDER PROCEEDING,
17 I NEEDED TO RECORD IT TO PROTECT MYSELF.

18 THE COURT: HOW?

19 MS. TOWNSEND: AND PROTECT THE PROCESS SERVER.
20 BECAUSE MR. LOPEZ BY THIS INDIVIDUAL WHO HAD BEEN IN
21 CONTACT WITH ME, THIS INDIVIDUAL, ANGEL, WHO I LATER
22 FOUND OUT WAS NAMED JOSEA MADE IT CLEAR THAT MR. LOPEZ
23 HAD HIRED SECURITY AT NBC, WAS ESSENTIALLY TRYING TO
24 EVADE SERVICE.

25 THE COURT: WELL, WHEN WAS YOUR LAWSUIT FILED?

26 MS. TOWNSEND: IT WAS FILED ON JUNE 13TH.

27 THE COURT: WHEN WAS HE SERVED?

28 MS. TOWNSEND: JUNE 15TH.

1 THE COURT: IT SURE DOESN'T SOUND LIKE HE COULD
2 HAVE EVADED SERVICE.

3 MS. TOWNSEND: WELL, HE KNEW THE LAWSUIT WAS COMING
4 BECAUSE I HAD BEEN POSTING ABOUT IT, SO HE KNEW THE
5 LAWSUIT WAS COMING. AND THEN FURTHERMORE, I DIDN'T
6 REALIZE IT AT THE TIME, BUT HE WAS SPEAKING WITH HIS
7 ATTORNEY AND FEEDING INFORMATION, SO HE KNEW THE LAWSUIT
8 WAS COMING. I SENT THIS INDIVIDUAL, ANGEL, A COPY OF
9 THE SUIT WHEN IT WAS FILED.

10 THE COURT: SO WHAT'S YOUR FOUNDATION OF KNOWLEDGE
11 FOR KNOWING WHAT COMMUNICATION HE'S ALLEGEDLY HAVING --

12 MS. TOWNSEND: YOU'RE RIGHT. I DON'T HAVE A
13 FOUNDATION FOR IT, SO I'LL STEP BACK FROM THAT.

14 THE COURT: ALL RIGHT. SO THAT TESTIMONY WILL BE
15 STRICKEN.

16 MS. KAZARIAN: YEAH.

17 MS. TOWNSEND: SO THE -- I BELIEVED BASED ON WHAT
18 THIS INFORMATION I WAS RECEIVING FROM ANGEL, I BELIEVED
19 IT TO BE CORRECT THAT MR. LOPEZ HAD ADDITIONAL SECURITY
20 AT NBC WHICH WOULD MAKE IT HARD FOR A PROCESS SERVER TO
21 TRY TO GET ANYWHERE NEAR HIM TO SERVE PAPERS.

22 SO THE INITIAL IDEA WAS TO HAVE AN INDIVIDUAL
23 GO TO HIS WORK AND SERVE HIM THERE, BUT I THOUGHT THAT
24 WOULD BE EVEN MORE INFLAMMATORY BECAUSE HE WOULD BE AT
25 WORK AND MIGHT BE FILMING, SO I DECIDED THAT THE LESS
26 INFLAMMATORY WAY OF SERVING HIM WAS TO NOT DO IT ON-SET,
27 BUT PERHAPS DO IT AT HOME OR WHERE HE IS SOMEWHERE NOT
28 NEAR MEDIA CAMERAS. SO THE NEXT IDEA WAS -- OKAY.

1 THE COURT: SO NOT NEAR MEDIA CAMERAS, BUT YOU'RE
2 FILMING IT, AND -- AND THEN PUTTING IT ON SOCIAL MEDIA?

3 MS. TOWNSEND: SO HERE IS WHAT HAPPENED. SO I
4 FILMED IT WITH MY PHONE AND I GAVE IT TO THE
5 VIDEOGRAPHER. THE VIDEOGRAPHER, WHO WAS IN THE CAR, TO
6 JUST MAKE SURE THAT, YOU KNOW, HE CAPTURED IN CASE
7 SOMETHING WENT WRONG, SOMETHING THAT I WOULD NEED TO USE
8 EITHER LATER ON TO EITHER PROVE SERVICE OR IN THIS
9 SITUATION TO DEFEND MYSELF IN A RESTRAINING ORDER
10 HEARING.

11 THE COURT: SO I'M ASKING YOU TO PAUSE AGAIN.
12 THERE WAS A VIDEOGRAPHER PRESENT?

13 MS. TOWNSEND: YES.

14 THE COURT: SOMEBODY WHO IS VIDEOTAPING IT THAT WAS
15 NOT YOU?

16 MS. TOWNSEND: CORRECT.

17 THE COURT: SO, AGAIN, WHY WERE YOU THERE?

18 MS. TOWNSEND: I WAS THERE BECAUSE THE PROCESS
19 SERVER IS NOT A REGISTERED PROCESS SERVER.

20 THE COURT: SO?

21 MS. TOWNSEND: SO THAT INDIVIDUAL NEEDED TO HAVE
22 INSTRUCTIONS. SO IN THE STATE OF CALIFORNIA, YOU CAN
23 HAVE ANYONE OVER THE AGE OF 18.

24 THE COURT: OH, I KNOW WHAT THAT RULE IS.

25 MS. TOWNSEND: AND SO, I NEEDED TO PROVIDE THEM
26 INSTRUCTIONS ON HOW TO SERVE. AND AS YOU SAW IN THE
27 VIDEO, THEY DIDN'T KNOW HOW TO GIVE THE PAPERS, SO I WAS
28 STRICTLY THERE --

1 THE COURT: DIDN'T YOU SAY THAT BEFORE YOU SEND
2 THEM?

3 MS. TOWNSEND: I DID. I WALKED THEM THROUGH
4 EVERYTHING. BUT WHEN THE EVENT ACTUALLY HAPPENED, SHE
5 WAS UNABLE. SHE FROZE AND WAS UNABLE TO ACTUALLY DO
6 WHAT WE HAD DISCUSSED WHICH WAS TO HAND THE PAPERS OR TO
7 LEAVE THE PAPERS SOMEWHERE NEAR THE PERSON BEING SERVED.
8 SO IT'S CLEAR IN THE VIDEO. IF I WASN'T THERE, SHE
9 WASN'T GOING TO EVEN DELIVER THE PAPERS CORRECTLY. SO
10 THERE WAS A VIDEOGRAPHER IN THE VEHICLE TO CAPTURE
11 BEHIND THE SCENES, AND WHAT HAPPENED WAS, I HAD
12 MISTAKENLY SENT HIM -- I SHOULDN'T HAVE DONE THIS.

13 I MISTAKENLY SENT HIM THE VIDEO. THE
14 INDIVIDUAL THAT TOOK IT, AND PUT IT ON HIS SEPARATE
15 TIK TOK ACCOUNT AS A CLIP, AS A SHORT CLIP THAT JUST
16 SHOWED THE GATE CLOSING AND MARIO BEING SERVED; HOWEVER,
17 THE ENTIRE BEGINNING OF THE VIDEO, WHICH I BELIEVE WAS
18 PROTECTIVE OF ME, AND NOTHING HAVING BEEN SAID TO
19 MR. LOPEZ THAT WAS INFLAMMATORY. I THEN LATER THAT DAY
20 POSTED THAT TO SHOW THAT NOTHING INFLAMMATORY WAS SAID
21 BEFORE.

22 SO THE DAY OF THE PROCESS SERVICING, WE -- SO
23 THERE WAS A VIDEOGRAPHER, AND THE WOMAN WHO WAS PROCESS
24 SERVING WITH ME. AND SO, WE WENT TO THE HOME, AND WE
25 WERE HONESTLY THINKING WE WOULD SUBSERVE. I KNOW YOU
26 HAVE TO DO THREE SUBSERVES, BUT WE WERE THINKING WE
27 COULD SUBSERVE THE INDIVIDUAL THAT WAS OUTSIDE BECAUSE
28 IT LOOKED LIKE THAT WAS A FAMILY MEMBER.

1 NOW, WE FIND OUT IT WAS A WRESTLING COACH, SO
2 THE INITIAL GOAL WAS TO SUBSERVE THAT INDIVIDUAL. SO WE
3 GET OFF THE CAR, AND I CAN'T REMEMBER WHO -- SOMEBODY
4 HAD ASKED --

5 THE COURT: YOU WERE GOING TO SUBSERVE SOMEONE
6 OTHER THAN MARIO LOPEZ ON FATHER'S DAY?

7 MS. TOWNSEND: WE WERE JUST TRYING. IT WASN'T
8 BECAUSE OF FATHER'S DAY. IT WAS BECAUSE JUNE 13TH WAS
9 WHEN THE CASE WAS FILED, AND WE HAD A CONFORMED COPY.
10 SO THE ATTEMPT WAS TO EITHER DO SATURDAY OR SUNDAY, BUT
11 THE INDIVIDUAL THAT WAS FEEDING ME INFORMATION
12 SPECIFICALLY SAID MARIO IS AT CHURCH ON SUNDAY. YOU
13 SHOULD TRY TO GO GET HIM ON SUNDAY, WHICH IS WHAT THE
14 ADMISSION WAS BY MS. LOPEZ WHEN SHE STATED SHE WAS --
15 THAT THERE WAS AN INDIVIDUAL WORKING, OR I WAS TRYING TO
16 GEO-LOCATE THE CHURCH, RIGHT. SO SHE CONFIRMED THAT
17 THEY KNEW SOMETHING ABOUT THIS GEO-LOCATION OF THE
18 CHURCH.

19 SO THE INDIVIDUAL WHO WAS FEEDING ME THE
20 INFORMATION SAID, I DON'T KNOW WHAT HE DOES ON SATURDAY,
21 BUT ON SUNDAY HE GOES TO CHURCH. SO WE ATTEMPT TO WAIT
22 FOR HIM TO GO TO CHURCH. IT'S CLEAR HE'S NOT GOING TO
23 CHURCH. SO WE SEE AN INDIVIDUAL OUTSIDE, WHICH IS THE
24 WRESTLING COACH, AND I SAY, LET'S JUST SUBSERVE THIS
25 GUY. HE'S GOT TO BE A FAMILY MEMBER. LET'S JUST SEE IF
26 HE LIVES HERE.

27 THE COURT: SO YOU'RE SAYING THERE WAS NO
28 CONVERSATION LIKE THE ONE THAT WAS BEING DESCRIBED

1 SAYING THAT MR. LOPEZ WAS INVOLVED IN A HIT-AND-RUN,
2 WHAT CAR DOES HE DRIVE ASKING HIM TO COME OUT?

3 MS. TOWNSEND: SO -- SO THE SERVER WAS TRYING TO --
4 WE WERE TRYING TO GET HIM TO COME OUT OF THE HOUSE IF HE
5 WAS EVEN HOME. WE WEREN'T SURE IF HE WAS EVEN HOME, SO
6 THERE WAS A CONVERSATION TO TRY, AND THIS IS USED ALL OF
7 THE TIME BY PROCESS SERVERS TO TRY TO GET THEM OUT OF
8 THE HOUSE TO SERVE PAPERS. IT'S NOT HARASSING. IT'S
9 NOT ABNORMAL. IT'S JUST SOMETHING TO TRY TO GET THE
10 PERSON, THE INDIVIDUAL OUT SO YOU CAN SERVE PAPERS.

11 AND AGAIN, I WAS TRYING TO KEEP AS FAR AWAY
12 FROM MR. LOPEZ AS POSSIBLE BECAUSE I DIDN'T WANT TO
13 JEOPARDIZE THE SERVICE; BUT UNFORTUNATELY, I HAD AN
14 INDIVIDUAL THAT WAS NOT FOLLOWING THE DIRECTIONS AND
15 DROPPING THE PAPERS, AND SERVING THEM PROPERLY.

16 SO WE WENT UP TO THE WRESTLING COACH, NOT THE
17 SON. WE WENT UP TO THE WRESTLING COACH AND ASKED, HEY,
18 IS MR. LOPEZ HOME? SOMEBODY SAID THERE MAY HAVE BEEN
19 LIKE A CAR ACCIDENT, I THINK IS WHAT THE PROCESS SERVER
20 SAID, AND IMMEDIATELY THE SON CAME IN AND SAID, "OH, WAS
21 IT A BLACK CAR?" AND I SAID, "I DON'T KNOW. MAYBE."
22 AND THEN THE SON RUNS INSIDE TO GET THE FATHER.

23 SO WE WEREN'T HAVING ANY DIRECT CONVERSATIONS
24 WITH THE SON. IT WAS WITH THE WRESTLING COACH, AND
25 BECAUSE THE SON WAS THERE, HE INTERJECTED INTO THE
26 CONVERSATION AND WENT AND GRABBED HIS FATHER WHICH FITS
27 WITH THE TESTIMONY THAT THIS MS. LOPEZ GAVE BECAUSE SHE
28 SAID HER SON WAS AFRAID OF BEING IN TROUBLE WITH THEM,

1 NOT AFRAID OF ME, BUT BEING IN TROUBLE WITH HIS PARENTS
2 FOR GOING INSIDE AND HAVING GRABBED MR. LOPEZ.

3 SO THAT IS IN ESSENCE WHAT OCCURRED. AND YES,
4 THE VIDEO WAS NOT SUPPOSED TO GO OUT. IT WAS ONLY
5 SUPPOSED TO GO OUT IF AND WHEN THERE WAS AN ISSUE WITH
6 SERVICE IF HE DIDN'T ANSWER THE COMPLAINT WITHIN 30
7 DAYS. BUT BECAUSE I MISTAKENLY GAVE THAT VIDEO FOOTAGE
8 TO THE VIDEOGRAPHER, HE POSTED IT ON THE SEPARATE
9 ACCOUNT, A CLIP OF IT THAT IS WHAT WENT VIRAL, AND THEN
10 SUBSEQUENT TO THAT, I POSTED THE LONGER CLIP. I SHOULD
11 SAY THAT SHOWED THE INTERACTIONS THAT HAPPENED PRIOR TO
12 THAT.

13 THE COURT: OKAY.

14 MS. TOWNSEND: SO THERE WAS NO INTENT TO HARASS.
15 IT'S JUST WORKING AS A PARALEGAL, I NEED TO MAKE SURE
16 THAT YOU'RE PROPERLY SERVING AN INDIVIDUAL, AND BECAUSE
17 I COULDN'T FIND A PROCESS SERVER WILLING TO DEAL WITH A
18 HIGH-PROFILE INDIVIDUAL AND POTENTIALLY SIT THERE FOR
19 TWO, THREE HOURS UNTIL THEY SAW SOMEBODY TO SERVE. IT
20 MADE IT VERY EXPENSIVE AND VERY DIFFICULT TO FIND ANY
21 REGISTERED PROCESS SERVER WILLING TO DO IT.

22 SO THAT IS WHY I HAD TO ENGAGE IN SOMEBODY WHO
23 WAS NOT A REGISTERED THE PROCESS SERVER.

24 THE COURT: OKAY. DO YOU HAVE ANY OTHER DIRECT
25 TESTIMONY YOU'D LIKE TO PROVIDE?

26 MS. TOWNSEND: NO. THAT'S IT. I'M READY FOR CROSS
27 EXAMINATION.

28 THE COURT: OKAY. CROSS.

CROSS EXAMINATION

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BY MS. KAZARIAN:

Q. YOU SPECIFICALLY CALLED OUT MR. LOPEZ BY HIS HANDLE, HIS SOCIAL MEDIA HANDLE IN YOUR POST ABOUT THE JENNIFER HUDSON EVENT, CORRECT?

A. CAN YOU TELL ME WHICH HANDLE I CALLED OUT?

Q. WHATEVER HANDLE YOU BELIEVED WAS RELATED TO MR. LOPEZ. I THINK IT'S MARIO LOPEZ VIVA?

A. I DON'T BELIEVE THAT'S ACTUALLY MARIO LOPEZ'S ACCOUNT.

MS. KAZARIAN: OBJECTION. NONRESPONSIVE.

THE COURT: OKAY. DIDN'T YOU TAG A HANDLE, MARIO LOPEZ VIVA?

THE WITNESS: I THINK THAT IS A CORPORATE ACCOUNT. I BELIEVE THAT'S FOR LIKE A RADIO SHOW, MARIO'S SHOW. IT'S NOT HIS PERSONAL ACCOUNT.

THE COURT: OKAY. SO YOU TAGGED HIS SHOW WITH NO INTENTION OF THAT DRAWING HIS ATTENTION?

THE WITNESS: I ASSUMED, JUST LIKE MR. LOPEZ ADMITTED UNDER OATH, THAT SOMEONE ELSE IS MANAGING THESE ACCOUNTS.

THE COURT: IT DIDN'T SOUND LIKE YOU ACTUALLY DID ASSUME THAT. IT SOUNDED LIKE YOU WERE SURPRISED TO LEARN THAT HE DOESN'T DO ANYTHING WITH THE TIK TOK ACCOUNT.

THE WITNESS: WELL, GIVEN THAT HIS ASSISTANT IS ON THE CALL, I ASSUME THAT THERE'S AN ASSISTANT MANAGING A LOT OF HIS SOCIAL MEDIA PROFILES, SO I DID NOT BELIEVE

1 THAT MARIO LOPEZ WAS ACTUALLY ACTIVELY ENGAGED IN THAT
2 VIVA ACCOUNT BECAUSE WHEN --

3 THE COURT: OKAY. I WILL CALL THAT THE ANSWER.
4 YOU'RE SAYING THAT YOU DON'T BELIEVE THAT HE WAS
5 ACTUALLY'S ENGAGED WITH THE ACCOUNT THAT YOU TAGGED THAT
6 HAD HIS NAME IN IT. OKAY.

7 THE WITNESS: CORRECT.

8 Q. BY MS. KAZARIAN: SO WHAT WAS THE PURPOSE OF
9 TAGGING THAT ACCOUNT?

10 A. MR. LOPEZ, AFTER I HAD CALLED HIM OUT FOR THE
11 DEFAMATORY COMMENTS ABOUT ME, HE BLOCKED ME ON
12 INSTAGRAM. AND SO, THERE WERE NO OTHER INTERACTIONS.
13 SO THE TWO COMMENTS I LEFT IN MARCH OF 2025 IN WHICH I
14 LEFT NOTHING HARASSING, OTHER THAN I WAS GOING TO BE
15 FILING A DEFAMATION LAWSUIT. HE BLOCKED ME BASED ON
16 THOSE COMMENTS. AND THEN THE ONLY OTHER ACCOUNT I FOUND
17 WAS A FAN PAGE, I BELIEVE.

18 Q. OKAY. SO AT THE POINT THAT YOU WERE POSTING
19 ABOUT SHOWING UP AT THE JENNIFER HUDSON SHOW, YOU HAD
20 BEEN BLOCKED BY THE ACCOUNT YOU BELIEVED MARIO LOPEZ WAS
21 AT LEAST MONITORING, CORRECT?

22 A. I WAS BLOCKED BY THE ACCOUNT THAT POSTED THE
23 DEFAMATORY COMMENTS ABOUT ME THAT WAS MADE PART OF MY
24 LAWSUIT WITH MR. LOPEZ.

25 MS. KAZARIAN: OBJECTION. NONRESPONSIVE.

26 THE COURT: IT IS.

27 MS. KAZARIAN: MOTION TO STRIKE.

28 THE COURT: STRICKEN.

1 THE WITNESS: CAN YOU REPHRASE THE QUESTION OR
2 REPEAT THE QUESTION, I SHOULD SAY?

3 Q. BY MS. KAZARIAN: AT THE TIME OF THE JENNIFER
4 LOPEZ -- JENNIFER HUDSON POSTING, YOU HAD BEEN BLOCKED
5 BY A SOCIAL MEDIA HANDLE YOU BELIEVED WAS RELATED TO
6 MR. LOPEZ, CORRECT?

7 A. YES. CORRECT.

8 Q. SO WHEN YOU POSTED THE JENNIFER HUDSON POST,
9 YOU TAGGED A DIFFERENT MARIO LOPEZ RELATED THE POST SO
10 THAT HE COULD POTENTIALLY SEE IT, CORRECT?

11 A. I BELIEVE I TAGGED A FAN PAGE.

12 Q. YOU JUST SAID THAT YOU POSTED SOMETHING YOU
13 THOUGHT WAS A RADIO PROGRAM?

14 A. WELL, FAN PAGE, RADIO PROGRAM. I'D HAVE TO
15 LOOK AT THE PAGE. IS IT POSSIBLE TO SEE IT?

16 Q. NO.

17 THE QUESTION IS, YOU POSTED THAT HANDLE BECAUSE
18 YOU WERE HOPING MARIO LOPEZ WOULD SEE IT, CORRECT?

19 A. THAT'S INCORRECT.

20 Q. YOU POSTED THAT HANDLE BECAUSE YOU KNEW THAT
21 THE ACCOUNT THAT MARIO LOPEZ WAS RELATED TO HAD BLOCKED
22 YOU, RIGHT?

23 A. CAN YOU REPHRASE THAT? I POSTED --

24 Q. YOU DIDN'T POST MARIO LOPEZ -- WHAT ACCOUNT DID
25 YOU THINK WAS RELATED TO MARIO LOPEZ?

26 A. THE ONE THAT HAD BLOCKED ME.

27 Q. RIGHT. SO WHY DIDN'T YOU POST THAT? WHY
28 DIDN'T YOU ADD THAT?

1 A. BECAUSE YOU CAN'T. ON INSTAGRAM ONCE AN
2 ACCOUNT BLOCKS YOU, YOU CAN'T POST ANYTHING, SO --

3 Q. YOU CAN TYPE IT IN.

4 A. NO. EXPLICITLY TAKE IT RIGHT OUT. IF YOU TRY
5 TO DO THAT ON ANY -- IF YOU'VE BEEN BLOCKED, IT WON'T
6 PUT @ SIGN AND IT TAKES IT OUT.

7 Q. OKAY. SO WHY DID YOU POST ANYTHING WITH @MARIO
8 LOPEZ?

9 A. IT'S MORE LIKE A HASH TAG. SO ANYTHING INSTEAD
10 OF HASH TAGS YOU DO @, @MARIO AND IT PULLS ANYTHING THAT
11 IS MARIO RELATED.

12 Q. BECAUSE YOU WANTED MARIO LOPEZ OR ANYONE
13 RELATED TO MARIO LOPEZ TO SEE IT, CORRECT?

14 A. THAT'S INCORRECT.

15 Q. WHY WOULD YOU POST IT THEN?

16 A. BECAUSE IT'S LIKE A HASH TAG TO IDENTIFY WHAT
17 THE POST WAS ABOUT.

18 Q. THE POST WAS ABOUT YOU GOING TO THE JENNIFER
19 HUDSON SHOW WHERE MARIO LOPEZ WAS GOING TO BE, CORRECT?

20 A. I NEVER WENT TO THE SHOW.

21 MS. KAZARIAN: OBJECTION. NONRESPONSIVE.

22 THE COURT: IT IS. SUSTAINED. STRICKEN.

23 Q. BY MS. KAZARIAN: THE POST WAS ABOUT YOU
24 APPEARING AT A JENNIFER HUDSON SHOW THAT MARIO LOPEZ WAS
25 SCHEDULED TO BE AT, CORRECT?

26 A. THE POST -- ARE WE TALKING ABOUT THE JENNIFER
27 -- OKAY. SO YOUR QUESTION IS WHY? I'M SORRY. I DON'T
28 UNDERSTAND THE QUESTION. I THOUGHT I ALREADY HAD

1 ANSWERED THAT, SO...

2 Q. WHY WOULD YOU POST @MARIO LOPEZ -- I'M SORRY.
3 YOU POSTED @MARIO LOPEZ TO LET PEOPLE KNOW THAT
4 YOU WERE GOING TO BE PRESENT AT THE JENNIFER HUDSON
5 SHOW, CORRECT?

6 A. THAT IS INCORRECT.

7 Q. WHY DID YOU POST IT?

8 A. AGAIN, TO IDENTIFY WHAT THE POST -- WHO THE
9 POST WAS REFERENCING TO.

10 Q. THE POST WAS REFERRING TO MARIO LOPEZ.

11 A. BECAUSE HE --

12 Q. THE POST WAS REFERRING TO MARIO LOPEZ, CORRECT?

13 A. I BELIEVE SO.

14 Q. AND THE POST WAS, YOU POSTING A TICKET AND
15 SAYING, "I WILL SEE YOU THERE, MARIO," CORRECT?
16 CORRECT?

17 A. I BELIEVE THAT'S THE CONTENTS OF THE POST, YES.

18 Q. OKAY. AND YOU POSTED @MARIO LOPEZ IN SOME
19 FORMAT BECAUSE YOU WERE TELLING MARIO LOPEZ THAT YOU
20 WERE GOING TO BE AT A SHOW WHERE HE WAS GOING TO BE.
21 YOU WANTED MARIO LOPEZ TO KNOW THAT, CORRECT?

22 A. NO. THAT'S NOT CORRECT. AND ACTUALLY, I
23 CAN -- I'M PRETTY SURE I CAN PROVE THAT BECAUSE HE DID
24 NOT BLOCK ME ON X.

25 Q. MY QUESTION IS, WHY DID YOU POST THAT, WHY?

26 A. AGAIN, IT'S LIKE A HASH TAG. YOU USE --

27 Q. WHY?

28 A. YOU USE @ SIGNS IN HASH TAGS TO REFERENCE WHAT

1 IT'S ABOUT.

2 THE COURT: MS. TOWNSEND, YOU USE HASH TAGS TO HASH
3 TAG. YOU DON'T USE @ SIGNS TO HASH TAG.

4 THE WITNESS: WELL, THE SYSTEM PULLS THEM UP THE
5 SAME WAY. IT ACTUALLY --

6 THE COURT: BUT IF WHAT YOU WANTED TO DO WAS CREATE
7 A HASH TAG, I THINK I'M SURE YOU KNOW HOW TO DO IT.

8 THE WITNESS: YES. I DID BOTH.

9 THE COURT: I'M NOT SURE WHAT YOU DID, BUT YOU USED
10 AN @ SIGN FOR SURE.

11 THE WITNESS: WELL, I WAS NOT UNDER THE BELIEF THAT
12 THAT ACCOUNT WAS MANAGED BY MR. LOPEZ. I FIRMLY WAS NOT
13 UNDER THAT BELIEF.

14 THE COURT: OKAY.

15 Q. BY MS. KAZARIAN: SO WHY POST THAT AT ALL?

16 A. POST THE POST ITSELF?

17 Q. YES. WHY SAY TO THE INTERNET, HEY, MARIO, I'M
18 GOING TO BE THERE AND HERE IS MY TICKET. WHY POST THAT?

19 A. AGAIN, IT WAS TO BE HUMOROUS ESPECIALLY GIVEN,
20 I WASN'T EVEN IN THE STATE OF CALIFORNIA AT THAT TIME.

21 Q. HOW WOULD MARIO LOPEZ KNOW YOU WEREN'T IN THE
22 STATE?

23 A. HE WOULDN'T KNOW BECAUSE I DIDN'T TAG HIM
24 BECAUSE IT WAS NEVER A THREAT.

25 Q. YOU TOLD THE INTERNET THAT YOU WERE THERE, AND
26 THAT YOU WERE ON A MISSION, CORRECT?

27 A. BY THE INTERNET, YOU MEAN MY -- I THINK 200
28 FOLLOWERS, THEN SURE. MY 200 FOLLOWERS KNEW.

1 Q. THE REASON THAT YOU POSTED THAT WAS TO LET
2 PEOPLE BELIEVE THAT YOU WERE GOING TO BE THERE?

3 A. YES. MY FOLLOWERS KNEW I WAS IN ANOTHER STATE.

4 MS. KAZARIAN: OBJECTION. NONRESPONSIVE.

5 THE COURT: IT IS. STRICKEN.

6 Q. BY MS. KAZARIAN: THE REASON YOU POSTED IT WAS
7 TO LET PEOPLE BELIEVE THAT YOU WERE GOING TO BE THERE,
8 CORRECT?

9 A. NO. THAT'S NOT THE REASON WHY I POSTED IT.

10 Q. WHY DID YOU POST IT?

11 A. I POSTED IT AGAIN FOR HUMOR, IRONY, AND THE
12 FACT I WASN'T EVEN IN THE STATE AT THAT TIME.

13 Q. SO WHERE IS THE PUNCH LINE IN THAT POST?

14 A. I THOUGHT IT WAS HUMOROUS.

15 Q. WHERE IS THE PUNCH LINE?

16 A. I -- YOU KNOW, THE PUNCH LINE IS SUBJECTIVE,
17 SO --

18 Q. SO WHERE IS IT?

19 A. I DON'T KNOW. I CAN'T EXPLAIN IF INDIVIDUALS
20 DON'T GET JOKES.

21 Q. YOU THINK IT'S FUNNY. PLEASE EXPLAIN TO ME HOW
22 IT'S FUNNY.

23 A. I THINK IT'S IRONIC, NOT FUNNY, BUT I THINK
24 IT'S IRONIC BECAUSE I'M NOT IN THE STATE AND HAD NO
25 INTENTION OF EVER GOING TO THE SHOW, AND IT WAS, AGAIN,
26 MORE TO CALL OUT THE -- IF YOU LOOK AT THE REST OF THE
27 POST, IT WAS MORE TO CALL OUT THE HYPOCRISY OF ONE
28 INDIVIDUAL WITH A SET OF ALLEGATIONS AND MYSELF WITH A

1 SET OF ALLEGATIONS, ONE IS ON JENNIFER HUDSON SHOW AND
2 ONE IS BARELY ABLE TO GET A JOB.

3 IT WAS, AGAIN TO CALL OUT THE HYPOCRISY OF HOW
4 TWO DIFFERENT INDIVIDUALS ARE CREATED BY THE MEDIA
5 INCLUDING THE JENNIFER HUDSON SHOW.

6 Q. YOUR ISSUE WITH MR. LOPEZ BEGINS WITH THE FACT
7 THAT HE REPOSTED AN INSIDE EDITION CLIP CLAIMING THAT
8 YOU WERE FAKING A NEUROLOGICAL DISORDER, CORRECT?

9 A. THAT IS PART OF THE DEFAMATION SUIT, BUT
10 THERE'S MORE THAN JUST THAT.

11 Q. GOING BACK TO YOUR JENNIFER HUDSON POST, WHICH
12 PART OF "HEY, @MARIOLOPEZVIVA, YOU HAVE NO IDEA WHO YOU
13 FUCKED WITH, MAN," IS A JOKE?

14 A. AGAIN, THESE ARE NOT MEANT TO BE SERIOUS POSTS.

15 Q. SO WHAT PART OF, "YOU HAVE NO IDEA WHO YOU
16 FUCKED WITH, MAN" IS MEANT TO BE UNSERIOUS?

17 A. THE MAN PART. "YOU HAVE NO IDEA WHO YOU FUCKED
18 WITH" ALL OF THAT IS SO RIDICULOUS FROM SOMEONE LIKE ME
19 OF 5'2", LITTLE CHEERLEADER TO SAY TO SOMEBODY WHO IS A
20 BIG, MUSCULAR BOXING MAN. IT'S -- IT'S IRONIC. IT'S
21 FUNNY. IT'S PARITY.

22 Q. WHAT PART OF, "I WILL MAKE YOUR LIFE A LEGAL
23 AND PR NIGHTMARE," WITH NIGHTMARE IN ALL CAPS. "YOU
24 PIECE OF SHIT," IS FUNNY?

25 A. THAT WAS -- THAT PARTICULAR PIECE WAS
26 REFERENCING THE LEGAL LAWSUIT I WAS GOING TO BRING
27 FORTH.

28 Q. "YOU PIECE OF SHIT" WAS ALSO REFERENCING THE

1 LEGAL LAWSUIT?

2 A. I DON'T BELIEVE THAT THAT IS -- HOW DO I FRAME
3 THIS? I DON'T BELIEVE THAT IS ANYWHERE OUT OF -- CAN
4 YOU REPEAT IT AGAIN? I'M SORRY.

5 Q. SURE. "HEY, MARIO LOPEZ VIVA, YOU HAVE NO IDEA
6 WHO YOU FUCKED WITH, MAN. SEE YOU ON THE @JHUD SHOW!"
7 EXCLAMATION POINT. "YOU IDIOT. I WILL MAKE YOUR LIFE A
8 LEGAL/PR NIGHTMARE", ALL CAPS, "YOU PIECE OF SHIT."

9 A. SO, AGAIN, TO ME AT THE TIME, AND STILL I
10 BELIEVE THAT THE IRONY IS IN THE -- A 5'2" CHEERLEADER
11 VERSUS THIS BIG WRESTLING GUY WHO IS SEEN WITH WRESTLERS
12 AND JOE ROGAN, LIKE HOW -- HOW COULD SOMEBODY LIKE ME
13 EVER, YOU KNOW, COMPETE OR BE A THREAT TO HIM?

14 Q. SO DO YOU ALSO BELIEVE THAT BECAUSE YOU'RE 5'2"
15 THERE'S NO REASON FOR MARIO LOPEZ TO BE AFRAID OF
16 SOMEBODY WHO POSTS, "YOU PIECE OF SHIT" ON THE INTERNET
17 DIRECTED AT HIM?

18 DO YOU THINK BECAUSE YOU'RE 5'2", HE SHOULD{
19 HAVE NO REASON TO BE AFRAID OF YOU WHEN YOU APPROACH HIM
20 AND HIS CHILDREN AT HIS HOUSE?

21 A. CAN YOU -- CAN YOU REPHRASE THE QUESTION?

22 Q. YES. YOU SAID THAT THE IRONY IS THAT YOU ARE
23 5'2", AND HE'S A BOXER.

24 SO DO YOU ALSO BELIEVE THAT BECAUSE YOU'RE 5'2"
25 AND HE'S A BOXER --

26 THE COURT: I THINK SHE SAID WRESTLER.

27 THE WITNESS: WRESTLER, YEAH. I DON'T KNOW WHAT
28 THE SPORT IS.

1 Q. BY MS. KAZARIAN: DO YOU BELIEVE THAT BECAUSE
2 YOU'RE 5'2" YOU CAN POSTS THINGS LIKE, "YOU PIECE OF
3 SHIT," AND THEN SHOW UP TO HIS HOUSE WITHOUT -- AND THAT
4 HE SHOULD NOT BE AFRAID OF YOU?

5 A. NO. I BELIEVE BECAUSE I'M 5'2" IN THE POST
6 WHEN YOU COMPARE THAT TO SOMEBODY OF HIS STATURE, THE
7 IRONY IS CLEAR.

8 Q. OKAY. YOU -- HOW LONG HAVE YOU BEEN A
9 PARALEGAL?

10 A. I BELIEVE MAYBE SEVEN, EIGHT YEARS.

11 Q. ARE YOU A CERTIFIED PARALEGAL?

12 A. I AM NOT CERTIFIED.

13 Q. DID YOU GO TO SCHOOL, A PARALEGAL SCHOOL?

14 A. NO. BUT I HAVE A BACHELOR'S DEGREE IN
15 BIOCHEMISTRY AND MOLECULAR BIOLOGY.

16 Q. SO YOUR BACHELORS IN BIOCHEMISTRY AND MOLECULAR
17 BIOLOGY ENTITLES YOU TO CALL YOURSELF A PARALEGAL?

18 A. NO. HAVING A BACHELOR'S DEGREE AND WORKING
19 UNDER THE SUPERVISION OF AN ATTORNEY DOES.

20 Q. OKAY. AND WHAT ATTORNEY DO YOU WORK UNDER WHO?
21 WHO SUPERVISES YOU?

22 THE COURT: IS THIS RELEVANT?

23 MS. KAZARIAN: YEAH. WELL, I CAN MOVE ON.

24 THE COURT: YEAH, LET'S.

25 MS. KAZARIAN: I BELIEVE IT'S A CREDIBILITY ISSUE.

26 THE COURT: SO PARALEGALS DON'T NEED TO BE
27 CERTIFIED. THAT'S NOT REQUIRED, AND IT'S 4:08 P.M.

28 MS. KAZARIAN: I UNDERSTAND.

1 Q. BY MS. KAZARIAN: YOU HAVE EXTENSIVE EXPERIENCE
2 IN SERVING OR HAVING LAWSUITS SERVED, RIGHT?

3 A. CORRECT.

4 Q. YOU UNDERSTAND THAT A PARTY TO A LAWSUIT CANNOT
5 SERVE A LAWSUIT, CORRECT?

6 A. CORRECT. THAT'S WHY I DID NOT SERVE IT.

7 Q. RIGHT. WHY DID YOU NEED TO BE PRESENT
8 YOURSELF?

9 A. BECAUSE I HIRED AN INDIVIDUAL WHO WASN'T A
10 REGISTERED PROCESS SERVER AND NEEDED DIRECTION AS YOU
11 COULD CLEARLY TELL FROM THE VIDEO.

12 Q. YOU ALSO HIRED A VIDEOGRAPHER?

13 A. CORRECT.

14 Q. WELL, WHY DIDN'T YOU VIDEOTAPE THE ENTIRE
15 PROCESS FROM THE TIME THAT YOU ARRIVED UNTIL THE TIME
16 THAT YOU LEFT?

17 A. I ONLY NEEDED THE VIDEO TO BE PROTECTIVE OF
18 MYSELF AND THE PROCESS SERVER, SO THAT WAS STRICTLY WHAT
19 IT WAS FOR.

20 Q. WHY WOULD YOU NEED TO PROTECT YOURSELF?

21 A. FROM A RESTRAINING ORDER CLEARLY.

22 Q. WHY WOULD YOU EVEN NEED TO APPROACH MR. LOPEZ
23 OR HIS PROPERTY AT ALL?

24 A. I DIDN'T APPROACH MR. LOPEZ AT ALL. IF YOU
25 ACTUALLY LOOKED AT THE VIDEO, I WAS BEHIND THE PROCESS
26 SERVER THE ENTIRE TIME. I DID NOT WANT MR. LOPEZ TO SEE
27 ME THERE BECAUSE HE IMMEDIATELY WOULD EVADE SERVICE, SO
28 I WAS ATTEMPTING TO STAY AS FAR AWAY FROM HIM AS I

1 POSSIBLY COULD SO THAT THE PROCESS SERVER COULD DO THEIR
2 JOB.

3 Q. OKAY. I DEFINITELY BELIEVE THE VIDEO SPEAKS
4 FOR ITSELF.

5 A. WELL, YOU CAN PLAY IT.

6 Q. WE'VE PLAYED IT.

7 WHY WOULD YOU SPEAK TO MR. LOPEZ WHILE AFTER
8 THE RESTRAINING ORDER WAS SERVED?

9 A. I DIDN'T DIRECTLY SPEAK TO MR. LOPEZ. WHEN HE
10 STATED THAT I WAS A CRAZY, FUCKING BITCH THAT'S WHEN I
11 SAID, "I'LL SEE YOU IN COURT. HAPPY FATHER DAY."

12 Q. YOU WERE WELL AWARE AT THIS POINT THAT
13 MR. LOPEZ HAD BLOCKED YOU ON NUMEROUS SOCIAL MEDIA
14 PLATFORMS AT THAT POINT, CORRECT?

15 A. I BELIEVE ONE ACCOUNT HE STILL HAS ME UNBLOCKED
16 ON TIK TOK AND UNBLOCKED ON REDDIT. I'M SORRY.
17 UNBLOCKED ON X. I KNOW MR. LOPEZ HAS NOT BLOCKED ME ON
18 TIK TOK BECAUSE HE'S STILL ENGAGING IN ALL OF MY
19 CONTENT.

20 Q. YOU BELIEVE THAT MR. LOPEZ IS ACTIVELY ENGAGED
21 IN A SOCIAL MEDIA CAMPAIGN TO SILENCE YOU?

22 A. NOT TO SILENCE ME, BUT TO SMEAR ME.

23 Q. TO SMEAR YOU.

24 YOU BELIEVE THAT MR. LOPEZ IS ACTING IN
25 COORDINATION WITH GIANT MEDIA CONGLOMERATES TO SMEAR
26 YOU?

27 A. NO.

28 Q. YOU STATED THAT MULTIPLE TIMES ON SOCIAL MEDIA,

1 CORRECT?

2 A. NO. THAT'S NOT CORRECT. WHAT I ACTUALLY
3 STATED IS, I BELIEVE AS EVIDENT HERE THAT THERE IS PRESS
4 SUPPRESSION OF THE COVERAGE OF EVEN THIS RESTRAINING
5 ORDER BECAUSE I HAVE A PENDING LAWSUIT WITH PARAMOUNT
6 GLOBAL.

7 Q. YOU STATED ON SOCIAL MEDIA THAT MYSELF AND
8 MR. LOPEZ ARE ACTIVELY ENGAGED IN ALTERING THE ALGORITHM
9 ON TIK TOK TO SUPPRESS YOUR STATEMENTS, CORRECT?

10 A. NO. THAT'S ACTUALLY ALLEGATIONS THAT WERE PUT
11 FORTH IN THE DEFAMATION LAWSUIT, AND THAT HAS TO
12 SPECIFICALLY DOE WITH THE MOTT'S ADVERTISEMENT I BELIEVE
13 HE POSTED TWO DAYS PRIOR TO POSTING MY POST, AND --

14 Q. OKAY. SO THERE IS AN APPLE SAUCE POST THAT HE
15 MADE THAT YOU BELIEVE IS CONNECTED TO A MEDIA CAMPAIGN
16 TO SILENCE YOU, CORRECT?

17 A. IT'S AN APPLE JUICE POST, I BELIEVE GRAPE JUICE
18 WHICH IS WHERE THE GRAPE ALLEGATIONS CAME FROM BECAUSE
19 IN MY LAWSUIT I WAS SPEAKING ABOUT THE GRAPE JUICE
20 ADVERTISEMENT.

21 Q. THANK YOU.

22 YOU BELIEVE THAT THE GRAPE JUICE ADVERTISEMENT
23 IS TIED TO WITH A MEDIA CAMPAIGN TO SUPPRESS YOUR VOICE,
24 CORRECT?

25 A. NO, THAT'S NOT CORRECT.

26 Q. YOU BELIEVE THAT MR. LOPEZ IS ENGAGED IN A
27 CAMPAIGN TO SILENCE YOUR VOICE, AND THAT IS RELATED TO
28 THE GRAPE JUICE CAMPAIGN, CORRECT?

1 A. THAT IS NOT CORRECT. WOULD YOU LIKE ME TO
2 ELABORATE?

3 Q. ARE YOU GOING TO EXPLAIN THE CONNECTION BETWEEN
4 THE GRAPE JUICE AND YOURSELF?

5 A. YES.

6 Q. NO, THANK YOU.

7 YOU DO BELIEVE THERE'S A CONNECTION, CORRECT?

8 A. A CONNECTION TO WHAT?

9 Q. GRAPE JUICE AND YOU?

10 A. NO.

11 Q. THE GRAPE JUICE POSTING AND YOUR --

12 A. MY DEFAMATION LAWSUIT, SURE.

13 Q. YOU HAVE POSTED FROM -- YOU HAVE POSTED ON
14 TIK TOK FROM THE NBC STUDIOS IN CLOSE APPROXIMATION TO
15 WHERE MR. LOPEZ WORKS, CORRECT?

16 A. I DON'T KNOW WHERE MR. LOPEZ WORKS AT NBC
17 UNIVERSAL.

18 Q. YOU HAVE POSTED AND YOU HAVE SAID ON SOCIAL
19 MEDIA THAT YOU ARE USING THE WIFI AT MR. LOPEZ'S WORK,
20 CORRECT?

21 A. NO, AT NBC UNIVERSAL.

22 Q. AND THAT'S WHERE MR. LOPEZ WORKS, CORRECT?

23 A. ON A SATURDAY, CORRECT.

24 Q. SO YOU POSTED THAT YOU ARE ON THE NBC LOT USING
25 THE NBC WIFI, CORRECT?

26 A. YES, ON SATURDAY, JUNE 7TH FOR ONE TIME EVENT
27 THAT I WAS TICKETED FOR, TICKETED EVENT.

28 THE COURT: MS. KAZARIAN, BY THE WAY, IS THERE

1 EVIDENCE THAT -- I KNOW THAT MR. LOPEZ SAID THAT SHE WAS
2 THERE SEVERAL DAYS POSTING VIDEOS SEVERAL DAYS. SHE'S
3 ASSERTED THAT SHE WAS ONLY THERE FOR THE WEEKEND. I
4 HAVEN'T HEARD ANYTHING IN REBUTTAL ON THAT.

5 MS. KAZARIAN: THAT SHE WAS ONLY THERE FOR ONE DAY?

6 THE COURT: ONLY THERE FOR, I GUESS, TWO DAYS AS A
7 WEEKEND. IS THERE ANYTHING THAT CONTRADICTS HER
8 TESTIMONY ON THAT POINT? I JUST -- BECAUSE IF NOT, THEN
9 HONESTLY, I THINK MOVE ON TO A DIFFERENT TOPIC.

10 MS. KAZARIAN: NO. NO. AND I WON'T. BUT I WILL
11 MOVE ON.

12 Q. BY MS. KAZARIAN: I'M NOT TALKING ABOUT WHETHER
13 YOU WERE ACTUALLY THERE, HOW MANY TIMES YOU WERE
14 ACTUALLY THERE.

15 YOU POSTED ON SOCIAL MEDIA THAT YOU WERE USING
16 THE NBC UNIVERSAL WIFI IN ORDER TO POST ABOUT MR. LOPEZ
17 AND THE DEFAMATION LAWSUIT, CORRECT?

18 A. I HAD -- I BELIEVE IN THE POST IT ACTUALLY WAS
19 CALLING OUT THE IRONY OF BEING AT NBC UNIVERSAL TO WORK
20 ON A LAWSUIT THAT HAD TO BE FILED DAYS BEFORE THE
21 STATUTE OF LIMITATIONS, AND I THINK I EVEN HAD A VIDEO
22 WHERE I DISCUSSED THAT TOO BECAUSE JUNE 7TH --

23 THE COURT: SO JUST TO BE CLEAR, YOU WERE POSTING
24 ABOUT A LAWSUIT WHILE ON THE NBC LOT?

25 THE WITNESS: CORRECT.

26 THE COURT: OKAY. I GET THE POINT.

27 MS. KAZARIAN: I WILL REST, YOUR HONOR. NO FURTHER
28 QUESTIONS.

1 THE COURT: ALL RIGHT. DID YOU HAVE ANY OTHER
2 WITNESSES, ANY OTHER EVIDENCE THAT YOU WANTED TO
3 PRESENT?

4 MS. TOWNSEND: NO. NO. I DON'T HAVE ANY OTHER
5 EVIDENCE OR WITNESSES. I DIDN'T KNOW IF -- CAN I ASK
6 ANY MORE QUESTIONING OF COURTNEY LOPEZ OR NO? ARE WE
7 KIND OF DONE WITH THAT?

8 THE COURT: NO.

9 MS. TOWNSEND: FAIR ENOUGH. NO. I'M DONE.

10 THE COURT: OKAY. THEN BOTH SIDES HAVING RESTED,
11 THE COURT IS GOING TO CONSIDER THE MATTER SUBMITTED AT
12 THIS POINT.

13 I AM FINDING THAT THE PETITIONER HAS MET THEIR
14 BURDEN BY CLEAR AND CONVINCING EVIDENCE, AND PART OF IT
15 IS BECAUSE OF RESPONDENT'S TESTIMONY THAT SEEMED
16 CONTRADICTORY ON CERTAIN POINTS, SIMULTANEOUSLY SAYING
17 SHE'S ATTEMPTING TO DIFFUSE THE SITUATION BY MAKING
18 ACCUSATIONS, BUT ALSO CALLING OUT DISCREPANCIES OF
19 MISTREATMENT. THOSE ARE INCONSISTENT GOALS IN THE WAY
20 THAT THEY'RE BEING APPROACHED.

21 IF YOU SAY YOU'RE TRYING TO DIFFUSE THE
22 SITUATION WITH HUMOR THEN YOU'RE NOT DISPUTING IT BY
23 SAYING THAT THE PERSON IS A PIECE OF SHIT THAT THEY'RE A
24 D-LIST ACTOR, ALL OF THOSE THINGS. AND I WANT TO BE
25 CLEAR THAT EVEN THOUGH THAT IS AGGRESSIVE LANGUAGE, I
26 DON'T ACTUALLY THINK THAT I WOULD BE CONSIDERING ISSUING
27 A RESTRAINING ORDER BECAUSE ON HER CALLING MR. LOPEZ A
28 PIECE OF SHIT OR SAYING THAT HE'S A D-LIST ACTOR, THOSE

1 ARE OPINIONS, AND SHE'S ENTITLED TO HAVE HER OPINIONS,
2 AND SHE'S ENTITLED TO EXPRESS HER OPINIONS ON THE
3 INTERNET.

4 I THINK REALLY THE ISSUE CAME DOWN TO APPEARING
5 AT HIS HOME THAT WAS OVER THE LINE. AND ALMOST
6 EVERYTHING UP TO THAT PROBABLY MAY HAVE FALLEN INTO THE
7 REALM OF HE'S A PUBLIC FIGURE, AND YOU CAN DISCUSS HIM.
8 BUT WHEN YOU COMBINE THAT AS SORT OF A TOTALITY OF THE
9 CIRCUMSTANCES, WHAT WE SEE IS AT LEAST A MONTH BETWEEN
10 MARCH AND APRIL OF MAKING POSTS SAYING THAT HE WAS
11 ALLEGEDLY PAID TO HAVE SEX WITH WOMEN.

12 AND WHEN I ASKED YOU FOR WHERE YOU'RE GETTING
13 THIS FROM, AFTER MAKING A BIG POINT OF SAYING, I WOULD
14 NOT REPEAT THINGS UNLESS THEY WERE FROM, YOU KNOW, SITED
15 SOURCES, AND THAT WAS TRUE TO A CERTAIN POINT. YOU
16 SAID, LOOK, I ONLY SAID THAT HE WAS ACCUSED OF SEXUALLY
17 ASSAULTING WOMEN BECAUSE THERE ARE NEWS ARTICLES SAYING
18 THAT HE SEXUALLY ASSAULTED WOMEN.

19 THERE HAVE A BEEN DOCUMENTARIES THAT HAVE COME
20 OUT IN RECENT YEARS ABOUT SEXUAL ASSAULT ALLEGATIONS
21 FROM DECADES AGO THAT WERE NOT INVESTIGATED THAT WERE
22 NOT CHARGED AT THE TIME, AND IF YOU WERE ENGAGING IN
23 LEGITIMATE INVESTIGATIVE JOURNALISM OF THOSE ISSUES, I
24 THINK, THAT WOULD LOOK VERY, VERY DIFFERENT. BUT THEN
25 YOU SAY WELL, I SAW IT ON REDDIT. SEEING IT ON REDDIT
26 IS NOT REMOTELY A CREDIBLE SOURCE. SO ON ONE HAND
27 YOU'RE SAYING THERE'S SOME NEW STORIES, A DA SAID THAT
28 HE FOUND A WITNESS CREDIBLE EVEN THOUGH THERE WERE SOME

1 CONTRADICTORY WITNESSES.

2 AND THEN ON THE OTHER HAND, WERE SITTING TO
3 SOMEONE ON REDDIT SAID THAT HE ALLEGEDLY PAID WOMEN FOR
4 SEX, AND I DON'T KNOW WHERE THAT WAS, BUT I'M JUST
5 REPEATING THINGS, AND I'M TRYING TO DIFFUSE THE
6 SITUATION BY SAYING THAT HE HAS ROAST BEEF GENITALS THAT
7 HE HAS A VAGINA. THIS IS NOT DISUSING THE SITUATION.
8 IT'S CLEARLY NOT DIFFUSING THE SITUATION, AND THE
9 PROCESS SERVING, IF THAT HAD ACTUALLY HAPPENED ON ITS
10 OWN, IT PROBABLY WOULDN'T HAVE BEEN ENOUGH.

11 AGAIN, IT'S THE TOTALITY OF THE THING, AND IT'S
12 THE FACT THAT THE WAY THAT YOU'VE PORTRAYED THIS, REALLY
13 HONESTLY, SEEMS LIKE THE HARASSMENT IS KIND OF THE POINT
14 WHEN YOU POST THAT YOU'RE GOING TO BRING A GIFT FOR HIM
15 ON FATHER'S DAY, AND THEN YOU SHOW UP AT HIS HOME ON
16 FATHER'S DAY, FULLY UNNECESSARY, AND YOU'RE AT THE GATE
17 RIGHT THERE IN VIEW OF HIM TO DO THE PROCESS SERVING,
18 YOU'RE INTERACTING WITH HIS FAMILY UNNECESSARILY IN
19 ORDER TO SERVE A LAWSUIT. NONE OF THAT IS NECESSARY.

20 AND WHEN YOU SAY THAT YOU ARE GOING TO THE
21 JENNIFER HUDSON SHOW, SEE YOU AT THE TAPING, AND THEN
22 SAY WELL, I WAS OUT OF TOWN AT THE TIME. AGAIN, THAT'S
23 ALMOST WORSE. BECAUSE INSTEAD OF SAYING, WELL I'M THERE
24 BECAUSE I WANT TO CONFRONT HIM. I WANT TO CALL HIM OUT.

25 I DON'T KNOW IF THE JENNIFER HUDSON SHOW HAS A
26 Q AND A SECTION. IF THEY DO, THEY WOULD PROBABLY SCREEN
27 IT, SO THAT YOU PROBABLY WOULDN'T BE ABLE TO CONFRONT
28 HIM IN THAT SETTING. I DON'T KNOW. BUT TO SAY I'M

1 GOING TO BE THERE, SEE YOU THERE, AND THEN MAKING
2 VARIOUS ACCUSATIONS AGAINST HIM, IT SEEMS LIKE THE POINT
3 IS VERY MUCH TO MAKE HIM ANXIOUS, TO MAKE HIM
4 UNCOMFORTABLE, TO MAKE HIM FEEL HARASSED.

5 SO WHEN THE HURT, WHEN THE HARASSMENT IS THE
6 POINT, IT'S NOT PROTECTED BECAUSE IT'S A JOKE, AND I
7 DON'T BELIEVE IT'S A JOKE. I DON'T GET THE JOKE. I
8 THINK I HAVE A DECENT SENSE OF HUMOR. I DON'T GET THE
9 JOKE OF SAYING, WELL, I'M GOING TO SHOW UP AND I'M GOING
10 TO CONFRONT YOU, BUT ACTUALLY, I'M OUT OF TOWN, AND NO
11 ONE KNOWS THAT, AND THERE IS NO REASON ANYONE WOULD KNOW
12 THAT BECAUSE THAT'S NOWHERE IN ANY OF THE POSTS.

13 SO I'M NOT GOING TO ORDER THAT SHE CAN'T POST
14 ANYTHING ON SOCIAL MEDIA ABOUT MR. LOPEZ. IN FACT, SHE
15 HAS AN ONGOING LAWSUIT, AND I THINK TO A CERTAIN EXTENT
16 HER DISCUSSIONS ABOUT THE LAWSUIT ARE PROTECTED. SHE
17 CAN DISCUSS THE LAWSUIT.

18 SHE SEEMS TO WANT MAYBE SOME MEDIA ATTENTION TO
19 BE BROUGHT TO THE LAWSUIT FOR LEGITIMATE REASONS OR
20 OTHERWISE, IF SHE'S DOING SO BY JUST DISCUSSING THE
21 MERITS OF HER LAWSUIT THAT'S FINE. BUT YOU'RE NOT GOING
22 TO BRING ATTENTION TO THE MERITS OF YOUR LAWSUIT BY
23 MAKING A SIDE SHOW SHOWING UP AT HIS HOUSE AND TRY AND
24 ENGAGE IN OTHER FORMS OF HARASSMENT TO TRY TO INSTIGATE
25 A RESPONSE; THAT'S NOT RIGHT. THAT'S NOT APPROPRIATE,
26 AND IT'S TURNING THE COURT INTO A SIDE SHOW. WE DON'T
27 LIKE THAT. SO I AM ORDERING YOU TO NOT HARASS HIM,
28 INTIMIDATE HIM, MOLEST HIM, ATTACK, STRIKE, STALK,

1 THREAT, ASSAULT, HIT, ABUSE, DESTROY PROPERTY OF OR
2 DISTURB THE PEACE OF HIM OR ANY OF HIS FAMILY MEMBERS OR
3 TO CONTACT HIM IN ANY WAY.

4 YOU'RE NOT TO TAKE ANY ACTION TO OBTAIN HIS
5 ADDRESS OR LOCATION. I AM GOING TO INDICATE THAT A
6 REGISTERED PROCESS SERVER MAY LOCATE MR. LOPEZ IF
7 NECESSARY FOR A FILED LEGAL CASE, BUT YOU'RE NOT TO BE
8 PRESENT FOR ANY SERVICE THAT TAKES PLACE. YOU'RE TO
9 STAY 100 YARDS AWAY FROM HIM AND HIS FAMILY AND HIS HOME
10 AND HIS JOB OR WORKPLACE.

11 NOW, THESE ARE SPECIFICALLY NOT MEANT TO
12 EXCLUDE YOU FROM YOUR PLACE OF EMPLOYMENT, SO ONE
13 CONCERN THAT I DO HAVE IS, IT DOES SOUND LIKE YOU HAD A
14 LEGITIMATE REASON FOR BEING PRESENT ON THE NBC LOT EVEN
15 IF YOU WERE ALSO MAKING A POST AT THE SAME TIME, I DO
16 THINK JUST FOR THE PURPOSE OF UPSETTING MR. LOPEZ.

17 DO YOU HAVE ANY WORK ON THE NBC LOT?

18 MS. TOWNSEND: NO, I DO NOT.

19 THE COURT: OKAY.

20 MS. KAZARIAN: YOUR HONOR, IF I MAY? I'M SORRY.
21 OUR OFFICE, GERAGOS & GERAGOS, IS AUTHORIZED TO ACCEPT
22 SERVICE IF THERE IS ANYTHING. I JUST LIKE TO LET
23 MS. TOWNSEND KNOW, SO SHE DOESN'T NEED TO HIRE A PROCESS
24 SERVER.

25 MS. TOWNSEND: OKAY. THAT'S GOOD TO KNOW.

26 THE COURT: SERVICE MAY BE THROUGH MR. LOPEZ'S
27 ATTORNEY OF RECORD.

28 MS. KAZARIAN: THANK YOU.

1 THE COURT: I DID SEE IT IN THE TEMPORARY THAT THE
2 SCHOOL OF ONE PERSON WAS CHECKED OFF. I DON'T THINK
3 MR. LOPEZ IS IN SCHOOL, IS HE?

4 MS. KAZARIAN: HE IS NOT.

5 THE COURT: OKAY. ALL RIGHT. STAY WAY FROM HIS
6 HOME AND HIS WORKPLACE, THE SCHOOL OF HIS CHILDREN AND
7 HIS VEHICLE. YOU WILL ALSO STAY AWAY FROM HIS BULL
8 DOGS. I DON'T KNOW THAT THERE IS NECESSARILY A REASON
9 TO THINK THAT YOU ARE GOING TO GO ANYWHERE NEAR HIS BULL
10 DOGS, BUT THEY'RE MEMBERS OF THE HOUSEHOLD, SO THE COURT
11 IS GOING TO FIND GOOD CAUSE TO INCLUDE THEM.

12 I DON'T THINK THERE WERE ANY OTHER REQUESTS
13 OTHER THAN THE, WHAT I THINK ARE OVERLY BROAD REQUESTS
14 RELATED TO SOCIAL MEDIA.

15 SHE IS ORDERED TO NOT HARASS HIM OR TO DISTURB
16 HIS PEACE, SO I FEEL LIKE THERE IS WITHIN THAT MAYBE
17 SOME OF HER INTERPRETATION WHERE HOPEFULLY MS. TOWNSEND
18 IS NOT GOING TO GET INTO TROUBLE, BUT I WANT TO MAKE
19 SURE THAT IT'S CLEAR THAT IF YOU'RE POSTING ABOUT YOUR
20 LAWSUIT AND NOT JUST A POSTING PERSONAL ATTACKS OR
21 REITERATING ALLEGATIONS THAT YOU HEARD ON REDDIT, THEN
22 THAT'S FINE. YOU'RE ALLOWED TO DO THAT, BUT THIS IDEA
23 THAT YOU'RE PARROTING SOMETHING BY TALKING ABOUT VAGINAL
24 REJUVENATION SURGERY ON TWO DIFFERENT OCCASIONS, I --
25 THAT SEEMS HARASSING THAT SEEMS NOT FOR ANY LEGITIMATE
26 PURPOSE, SO I HOPE THAT THAT IS CLEAR.

27 I'M GOING TO ISSUE THIS RESTRAINING ORDER FOR A
28 YEAR AND A HALF. IT CAN BE RENEWED IF IT NEEDS TO BE

1 RENEWED. BUT THE POINT IS NOT SUPPOSED TO BE TO PUNISH
2 MS. TOWNSEND. IT IS TO ENFORCE BOUNDARIES. AND I THINK
3 MS. TOWNSEND JUST NEEDS A LITTLE BIT OF A LESSON AND
4 APPROPRIATE BOUNDARIES.

5 MS. TOWNSEND: AND YOUR HONOR, IF I MAY RESPOND TO
6 ONE QUICK PROCEDURAL THING AFTER?

7 THE COURT: PROCEDURAL. OKAY. GO AHEAD.

8 MS. TOWNSEND: YES. SO I UNDERSTAND YOU WERE NOT
9 THE PRECEDING JUDGE ON JULY 11TH WHEN THE HEARING THAT
10 WE HAD AND THE PETITIONER WAS GRANTED A CONTINUANCE FOR,
11 AND I JUST WANTED TO PUT THIS ON THE RECORD THAT
12 CCP SECTION 527.6 (G) REQUIRES THAT A HEARING FOR CIVIL
13 HARASSMENT RESTRAINING ORDER BE HELD 21 DAYS UP TO 25
14 DAYS IF GOOD CAUSE IS SHOWN.

15 IN THIS PARTICULAR MATTER, IT WAS FILED AND
16 GRANTED ON JUNE 20TH, 2025, AND THE HEARING DID NOT TAKE
17 PLACE UNTIL AUGUST 5TH, SO A TOTAL OR 46 DAYS, 46 DAYS.

18 THE COURT: AUGUST 6TH?

19 MS. TOWNSEND: 6. I APOLOGIZE AUGUST 6, SO A TOTAL
20 OF 46 DAYS. I JUST WANT TO FOR THE RECORD PUT ON THERE
21 THAT THIS WAS A CLEAR VIOLATION OF THE STATUTORY
22 TIMELINE THAT EXCEEDS THE MAXIMUM EXTENSION OF LAW, AND
23 GOOD CAUSE WAS NOT THE PETITIONER BEING UNPREPARED ON
24 JULY 11.

25 THE COURT: SO HOLD ON. HOLD ON. SO THE JULY 11TH
26 DATE WAS PETITIONER'S REQUEST FOR A CONTINUANCE FOR
27 SERVICE?

28 MS. TOWNSEND: BUT SHE READ OFF THE PROOF OF

1 SERVICE, SO SHE HAD READ THE PROOF OF SERVICE. SHE HAD
2 READ THE OPPOSITION, AND SHE REQUESTED A CONTINUANCE,
3 BUT DID NOT REALLY GIVE GOOD CAUSE TO JUSTIFY.

4 THE COURT: SO IF YOU'RE GOING TO OBJECT TO GOOD
5 CAUSE.

6 MS. TOWNSEND: I TRIED, YOUR HONOR.

7 THE COURT: OKAY. SO THAT OBJECTION IS UNTIMELY AT
8 THIS TIME.

9 MS. TOWNSEND: I JUST WANT IT ON THE RECORD THAT'S
10 IT.

11 THE COURT: WELL --

12 MS. KAZARIAN: I WOULD LIKE TO CORRECT THE RECORD.

13 THE COURT: OKAY. I WASN'T HERE. JUDGE ARCHULETA
14 WAS. GO AHEAD.

15 MS. KAZARIAN: MS. TOWNSEND -- YOUR HONOR, NEVER
16 MIND. IT DOESN'T MATTER. I WILL WITHDRAW.

17 THE COURT: OKAY. I'M JUST REVIEWING THE MINUTE
18 ORDER, AND IT INDICATES THAT THEY WERE CONFERRING ON THE
19 SERVICE OF THE RESPONSE, SO IT LOOKS LIKE IT WAS THE
20 SERVICE OF THE RESPONDENT'S PAPERS THAT WAS AT ISSUE.

21 MS. KAZARIAN: THAT'S CORRECT. I ASKED FOR THEM TO
22 BE STRICKEN. JUDGE ARCHULETTA SAID THAT SHE DIDN'T EVEN
23 HAVE TIME TO READ THE RESPONSE, SO SHE WOULD NOT MOVE
24 FORWARD. SHE WOULDN'T STRIKE THE RESPONSE, AND SHE
25 WOULD CONTINUE THE CASE SO THAT THE PETITION -- THE
26 RESPONDENT'S FILING COULD BE ACCEPTED BY THE COURT,
27 SO --

28 THE COURT: OKAY. AND THEN IT WAS CONTINUED TO

1 WITHIN THE 21 TO 25 DAYS FROM WHAT I CAN TELL.

2 MS. KAZARIAN: I ACTUALLY DID SPECIFICALLY REQUEST
3 THAT IT BE A GOOD CAUSE CONTINUANCE AND THAT WE NOT BURN
4 OUR STATUTORY, BUT I DON'T THINK IT MATTERS.

5 THE COURT: PETITIONERS DON'T HAVE A STATUTORY
6 CONTINUANCE.

7 MS. TOWNSEND: ONLY RESPONDENTS DO.

8 MS. KAZARIAN: BETTER. SO THEN IT WASN'T OURS.

9 THE COURT: YEAH. ALL RIGHT.

10 WELL, YOU MADE YOUR RECORD, AND THE RECORD IS
11 WHAT IT IS FOR JULY 11TH. I WASN'T THERE, BUT YOU WILL
12 BE SERVED WITH THE RESTRAINING ORDER HERE TODAY. IT
13 EXPIRES ON FEBRUARY 8TH OF 2027.

14 IT'S WORTH MENTIONING THAT, FRANKLY, IF YOU HAD
15 TAKEN THE POSITION THAT YOU REALIZED THAT YOU ACTED IN A
16 MANNER THAT WAS OUT OF LINE, THAT YOU HAD CROSSED A LINE
17 IN PARTICIPATING IN THESE SERVICE OF PROCESS AND
18 CONTACTING HIM AT HIS HOME AND HIS FAMILY THAT I MIGHT
19 NOT BE EVEN ISSUING A RESTRAINING ORDER AT ALL TODAY
20 BECAUSE IT IS REALLY JUST TO PREVENT FUTURE ABUSE.

21 THE FACT THAT YOU REALLY KIND OF DOUBLED DOWN
22 ON IT AND PROVIDED THESE INCONSISTENT EXPLANATIONS FOR
23 YOUR ACTIONS UP TO THIS POINT MADE THE COURT THINK IT
24 WAS NECESSARY.

25 MS. TOWNSEND: IF I MAY, I UNDERSTAND YOUR
26 CONCERNS. BUT TYPICALLY THESE PETITIONS ARE GRANTED FOR
27 PEOPLE IN FEAR, AND MR. LOPEZ SCREAMING ON THE STAND ON
28 AUGUST 6TH DOES NOT REALLY REFLECT SOMEBODY IN FEAR.

1 BUT MORE OF ANGER AND RAGE.

2 THE COURT: SO IT IS 4:29, I PROBABLY SHOULD HAVE
3 JUST LEFT IT WHERE I DID, BUT I THINK I DO ACTUALLY WANT
4 TO CLARIFY ONE THING FOR THE RECORD NOW.

5 MR. LOPEZ MADE STATEMENTS THAT HE WAS IN FEAR
6 OF MS. TOWNSEND, AND TO A CERTAIN EXTENT, THE COURT
7 DIDN'T FIND THOSE SPECIFIC STATEMENTS CREDIBLE. I DON'T
8 THINK THAT THERE WAS A THREAT OF VIOLENCE OR A CREDIBLE
9 THREAT OF VIOLENCE. I DO UNDERSTAND HIS CONCERN ABOUT
10 WHAT IS KIND OF ADJACENT TO STALKING BEHAVIOR.

11 I'M GRANTING THIS ON A COURSE OF CONDUCT THAT
12 IS HARASSING AND THAT REQUIRES JUST A SHOWING THAT HE IS
13 SERIOUSLY ALARMED, ANNOYED OR HARASSED.

14 THE FACT THAT HE WAS ANGRY, YES, HE WAS ANGRY,
15 THAT IS WHAT I ACTUALLY SAW ON THE STAND, BY YOUR
16 BEHAVIOR. I DON'T THINK IN ANY WAY DEFEATS HIS
17 ENTITLEMENT TO A RESTRAINING ORDER. I THINK THAT PEOPLE
18 SAY THAT THEY ARE AFRAID BECAUSE THEY THINK THAT THAT IS
19 THE CORRECT THING TO SAY IN RESTRAINING ORDER HEARINGS
20 SOMETIMES.

21 I THINK HE PROBABLY ACTUALLY SHOULD HAVE JUST SAID
22 THAT HE WAS VERY ANGRY, ANNOYED, AND FRANKLY, PISSED
23 BECAUSE THAT'S HOW HE CAME ACROSS FROM YOUR CONDUCT.

24 SO WITH THAT, NOW CONCLUDES THE MATTER.

25 MS. KAZARIAN: THANK YOU, YOUR HONOR.

26

27 (WHEREUPON PROCEEDINGS CONCLUDE.)

28

