

PARTY WITHOUT ATTORNEY OR ATTORNEY STATE BAR NUMBER: 295975 NAME: Omar Raul Serrato FIRM NAME: The Eagle Law Firm STREET ADDRESS: [REDACTED] CITY: [REDACTED] STATE: CA ZIP CODE: 92401 TELEPHONE NO.: [REDACTED] FAX NO.: [REDACTED] EMAIL ADDRESS: [REDACTED] ATTORNEY FOR (name): Michael Marraccini	<i>FOR COURT USE ONLY</i> ELECTRONICALLY FILED <i>Superior Court of California, County of San Francisco</i> 10/09/2025 Clerk of the Court BY: JOSHUA MANDAPAT Deputy Clerk
SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Francisco STREET ADDRESS: 400 McAllister St. MAILING ADDRESS: CITY AND ZIP CODE: San Francisco 94102 BRANCH NAME: Civic Center Courthouse	
PETITIONER: Laura Owens RESPONDENT: Michael Marraccini OTHER PARENT/PARTY:	
RESPONSIVE DECLARATION TO REQUEST FOR ORDER	CASE NUMBER: FDV-18-813693
HEARING DATE: 10/10/2025 TIME: 1:30PM DEPARTMENT OR ROOM:	

Read *Information Sheet: Responsive Declaration to Request for Order* (form [FL-320-INFO](#)) for more information about this form.

1. ☒ **RESTRAINING ORDER INFORMATION**
 - a. ☐ No domestic violence restraining/protective orders are now in effect between the parties in this case.
 - b. ☒ I agree that one or more domestic violence restraining/protective orders are now in effect between the parties in this case.

2. ☐ **CHILD CUSTODY**
☐ **VISITATION (PARENTING TIME)**
 - a. ☐ I consent to the order requested for child custody (legal and physical custody).
 - b. ☐ I consent to the order requested for visitation (parenting time).
 - c. ☐ I do not consent to the order requested for ☐ child custody ☐ visitation (parenting time)
☐ but I consent to the following order:

3. ☐ **CHILD SUPPORT**
 - a. I have completed and filed a current *Income and Expense Declaration* (form [FL-150](#)) or, if eligible, a current *Financial Statement (Simplified)* (form FL-155) to support my responsive declaration.
 - b. ☐ I consent to the order requested.
 - c. ☐ I consent to guideline support.
 - d. ☐ I do not consent to the order requested ☐ but I consent to the following order:

4. ☐ **SPOUSAL OR DOMESTIC PARTNER SUPPORT**
 - a. I have completed and filed a current *Income and Expense Declaration* (form [FL-150](#)) to support my responsive declaration.
 - b. ☐ I consent to the order requested.
 - c. ☐ I do not consent to the order requested ☐ but I consent to the following order:

PETITIONER: Laura Owens RESPONDENT: Michael Marraccini OTHER PARENT/PARTY:	CASE NUMBER: FDV-18-813693
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5. ☐ PROPERTY CONTROL
- a. ☐ I consent to the order requested.
- b. ☐ I do not consent to the order requested ☐ but I consent to the following order:
-
6. ☐ ATTORNEY'S FEES AND COSTS
- a. I have completed and filed a current *Income and Expense Declaration* (form [FL-150](#)) to support my responsive declaration.
- b. I have completed and filed with this form a *Supporting Declaration for Attorney's Fees and Costs Attachment* (form [FL-158](#)) or a declaration that addresses the factors covered in that form.
- c. ☐ I consent to the order requested.
- d. ☐ I do not consent to the order requested ☐ but I consent to the following order:
-
7. ☒ OTHER ORDERS REQUESTED
- a. ☐ I consent to the order requested.
- b. ☒ I do not consent to the order requested ☒ but I consent to the following order:
Please see attached. Type text here
-
8. ☐ TIME FOR SERVICE / TIME UNTIL HEARING
- a. ☐ I consent to the order requested.
- b. ☐ I do not consent to the order requested ☐ but I consent to the following order:
-
9. ☒ FACTS TO SUPPORT my responsive declaration are listed below. The facts that I write and attach to this form cannot be longer than 10 pages, unless the court gives me permission. ☐ [Attachment 9.](#)
Please see attached.

I declare under penalty of perjury under the laws of the State of California that the information provided in this form and all attachments is true and correct.

Date: 10/09/2025

Omar Serrato

(TYPE OR PRINT NAME)

 Omar R Serrato

(SIGNATURE OF DECLARANT)

Omar R. Serrato, SBN #295975

Attorney for Respondent, MICHAEL MARRACCINI

**THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO**

LAURA OWENS,

Petitioner

vs.

MICHAEL MARRACCINI,

Respondent

) Case No: FDV-18-813693
)
) RESPONDENT MICHAEL MARRACCINI'S
) OPPOSITION TO LAURA OWENS EX PARTE
) REQUEST FOR CONTINUANCE
)
) Hearing Date: October 9, 2025
) Time: 1:30pm
) Department: 405a
) Judge: Hon. Carolyn Gold
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3 **MEMORANDUM OF POINTS AND AUTHORITIES**

4 **Factual Background**

5 Laura Owens initiated renewal of the DVRO in July of 2025. She requested a continuance
6 on July 25, 2025, and once more on August 13, 2025. A hearing was held on August 15, 2025,
7 whereby Owens' request was granted. A two day long cause trial was set for October 21 and
8 22, 2025. She now moves the court for a continuance less than two weeks before trial. The
9 reasons stated in her declaration of are her own doing.

10
11 **I. Petitioner Lacked Diligence in Obtaining Counsel and Preparing for Hearing.**

12 Petitioner will have had over **60 days after** her attorney says he withdrew on **August 15,**
13 **2025,** to find new counsel or prepare to represent herself. She waited until early October to
14 contact a lawyer referral service. She was told placement could take 2 to 4 weeks. She delayed.
15 Her claim of indigency in an Arizona case does not excuse her inaction. She could have acted
16 sooner or represented herself.

17 Lack of diligence is not good cause for a continuance under Cal. Rules of Court, rule
18 3.1332(c), which only allows delay for substitution or unavailability of counsel when the
19 circumstances are unavoidable and not the result of neglect. Petitioner's claim that proceeding
20 without counsel would materially prejudice her is not a legal basis for delay. She has filed
21 multiple lengthy documents to initiate this case. She can represent herself. Further delay would
22 reward her neglect and prejudice Respondent.

23
24 **II. Petitioner Has Taken No Steps to Attend the October 21,2025 Hearing.**

25 Petitioner is on felony release in Arizona. She cannot leave the state without court
26 approval. She did not seek permission to travel for this hearing. She previously obtained leave
27 to travel out of state in September for non-emergency reasons (**Exhibit A - Minute Order**
28 **Granting Owens' Request to Leave State**). She did not request permission to travel to California

1 in October for the trial dates. The record shows she has not planned to attend trial. We believe
2 her plan has always been to request a continuance of October proceedings, and she has waited
3 until less than two weeks before trial to do so.

4
5 **III. Petitioner's Request Confirms Respondent's Concerns About Delay Tactics.**

6 Respondent has long warned that Petitioner would try to delay or avoid an evidentiary
7 hearing. His August 25, 2025, motion to disqualify her counsel and his earlier opposition to her
8 request to proceed by declaration both predicted this tactic, and it has now come to fruition.
9 Petitioner's last-minute request relies on excuses that were foreseeable and within her control.

10 Granting a continuance would reward bad faith and penalize the Respondent, who has
11 prepared diligently and coordinated witnesses, some of whom have traveled from out of state.
12 Petitioner's sudden "medical" excuse, raised only after Respondent was fully prepared for trial,
13 is a transparent delay tactic.

14
15 **IV. Respondent is Entitled to Prompt Resolution; Further Delay Perpetuates Prejudice and**
16 **Due Process Concerns**

17 This case has already been delayed multiple times. The restraining order was set to
18 expire, but Petitioner's renewal request and repeated motions have kept Respondent under
19 ongoing restrictions and stigma. Each continuance extends these burdens, violating
20 Respondent's due process right to a timely hearing. Fam. Code § 242 requires that DVRO
21 matters be heard promptly.

22 Respondent is the party in need of relief. Petitioner uses the DVRO to harass him and
23 interfere with his life. Each postponement lets her use the order as leverage and avoid
24 accountability.

25 Judicial efficiency weighs against a continuance. This two-day hearing consolidates
26 several motions. Rescheduling would disrupt the Court's calendar and burden witnesses who
27 have arranged travel for October 21–22. Petitioner has no conflicting engagements. Her conflict
28 is self-created.

1 Equity, due process, and the interests of justice require that the hearing proceed as
2 scheduled. The Court should deny Petitioner's request and keep the October 21 and 22, 2025,
3 trial date.

4
5 **V. Petitioner Has a History of Requesting Continuances At the Last Minute**

6 Owens has repeatedly sought last-minute continuances based on claims that cannot be
7 verified. On August 1, 2022, as shown in Exhibit 4 (page 1), she emailed a Maricopa County
8 Superior Court judicial assistant ex parte. She claimed she had been drugged, assaulted, and
9 raped, and that the FBI was investigating. She accused the opposing party and counsel. (**Exhibit**
10 **B, Letter to Judicial Assistant**). She sent this message days before a scheduled hearing and used
11 it to request delay. The assistant informed her that her ex parte contact was improper and that
12 she must follow court rules. Owens continues to raise sudden emergencies to delay
13 proceedings.

14 This is Owens' modus operandi. When faced with impending deadlines or adverse
15 rulings, Owens introduces new crises to justify postponements. Her unsupported rape and FBI
16 investigation claims in 2022 mirror the same tactics. She again presents vague "medical
17 emergencies" and "family crises" on the eve of trial. It's the same formula. Dramatic, unverified
18 emergency, raised at the last possible moment, aimed at halting proceedings and avoiding
19 examination under oath. The Court should recognize this as a pattern of manipulative delay,
20 not genuine cause for continuance.

21
22 **VI. Petitioner's Claimed "Emergencies" are Unsubstantiated and Do Not Justify a**
23 **Continuance**

24 Petitioner's claimed emergencies lack proof. A continuance for health or family issues
25 requires medical documentation or testimony. Petitioner provides none. She offers only her
26 declaration.

27 Owens' truthfulness about medical claims is directly at issue in these proceedings. The
28 court must be suspicious of any representations regarding medical conditions raised by

1 petitioner. She has two weeks to arrange care for her father. There is no evidence she is the
2 only available caretaker or that his condition prevents her attendance. Her reported medical
3 condition is not an emergency and is unsubstantiated. She is not hospitalized, incapacitated, or
4 scheduled for treatment during the trial dates of October 21 and 22.

5
6 **VII. Conclusion**

7 Under Family Code §217, Rule 5.113, and the interests of justice, this case should proceed as
8 scheduled. Petitioner's last-minute motion is a meritless attempt to delay proceedings; the
9 Court should deny the continuance and proceed as scheduled.

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11 Dated: October 7, 2025

Respectfully Submitted,

12
13 *Omar R Serrato*

14 _____
Omar Serrato

15 Counsel for Respondent, Michael Marraccini
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EXHIBIT A

SUPERIOR COURT OF ARIZONA
MARICOPA COUNTY

CR2025-006831-001 DT

09/03/2025

HONORABLE JEFFREY A. RUETER

CLERK OF THE COURT
D. McHardy
Deputy

STATE OF ARIZONA

EDWARD DOUGLAS LEITER

v.

LAURA MICHELLE OWENS (001)

SANDRA SCHUTZ

D&C MATERIALS-CSC
JUDGE RUETER
PSD-RELEASE AND REPORTS

MINUTE ENTRY

The Court has received and reviewed the Defendant's Motion to Modify Conditions of Release to Allow for Travel, filed 09/02/2025.

The State taking no position and there being good cause appearing,

IT IS ORDERED granting the Motion and permitting the Defendant to travel to San Diego, California from 09/04/2025 to 09/08/2025, and from 09/10/2025 to 09/15/2025, and from 09/23/2025 to 09/26/2025.

All in accordance with formal written order signed by the Court on 09/02/2025 and filed by the Clerk of Court on 09/03/2025.

The Court has also received and reviewed the Defendant's Motion to File Under Seal, filed 09/02/2025.

There being good cause appearing,

SUPERIOR COURT OF ARIZONA
MARICOPA COUNTY

CR2025-006831-001 DT

09/03/2025

IT IS ORDERED granting the Motion and directing the Clerk of the Court to seal Exhibit 1, not to be opened without further order of the Court.

All in accordance with formal written order signed by the Court on 09/02/2025 and filed by the Clerk of Court on 09/03/2025.

SUPERIOR COURT OF ARIZONA
MARICOPA COUNTY

CR2025-006831-001 DT

09/18/2025

HONORABLE JEFFREY A. RUETER

CLERK OF THE COURT
D. McHardy
Deputy

STATE OF ARIZONA

EDWARD DOUGLAS LEITER

v.

LAURA MICHELLE OWENS (001)

SANDRA SCHUTZ

JUDGE RUETER
PSD-RELEASE AND REPORTS

MINUTE ENTRY

The Court has received and reviewed the Defendant's Motion to Modify Conditions of Release to Allow for Travel, filed 09/16/2025.

The victim having no objection, the State taking no position and there being good cause appearing,

IT IS ORDERED granting the Motion and permitting the Defendant to travel to California from 09/18/2025 to 09/26/2025.

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EXHIBIT B

From: Ka [REDACTED]@law.com>
Sent: Monday, August 01, 2022 3:30 PM
To: G [REDACTED]@law.com>; ls [REDACTED]@law.com>
Subject: FW: CV2021-052893 - important

From: Marlene [REDACTED]@JBAZMC.Maricopa.Gov>
Sent: Monday, August 1, 2022 3:30 PM
To: Laura Owens [REDACTED]@v.com>
Cc: K [REDACTED]@klaw.com>
Subject: RE: CV2021-052893 - important

Ms. Owens:

Ex parte communication with the Court is not allowed. I am copying opposing counsel on this email so that counsel is aware of what I am telling you.

This email address is for informational purposes only. If you want to provide the Judge with substantive information regarding your case you must do so in accordance with the Rules.

Best regards,

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Gmail - Fwd: FW: CV2021-052893 - important

Marlene H. [REDACTED]

Judicial Assistant to the
Honorable Alison Bachus
Maricopa County Superior Court
Northeast Regional Court Center
Courtroom 111 | Suite F
Phone: 602-506-7569
Fax: 602-372-8550

From: Laura Owens [REDACTED]@JBAZMC.Maricopa.Gov>
Sent: Monday, August 1, 2022 2:55 PM
To: Marlene [REDACTED]@JBAZMC.Maricopa.Gov>
Subject: CV2021-052893 - important

Hi Marlene,

I hate to email you again, but there is a major issue with the defendant, Mr. Gregory Gillespie, *and his attorney*, Mr. Gregg Woodnick that needs to be brought to Judge Bachus' attention privately before she rules on the Motion to Extend filed by my now former attorney, Kari Ramos, as I have

On March 4th, 2022, I was drugged, violently assaulted, and raped. *I have strong reasons to believe that both the Defendant and his counsel were involved, and **there is a pending FBI investigation** regarding the incident.* To my knowledge, neither the Defendant nor his counsel are aware that they are being looked into. I was worried that submitting a Motion Ex Parte could accidentally be publicly e-filed and accessed by them, which would pose a threat to my safety. I apologize for sending an email, but I could not think of any other way to alert Judge Bachus about this without giving the other side confidential information about what has transpired.

I have an Order of Protection against Mr. Gillespie, which was issued on November 12th, 2021, and was uncontested. Just weeks prior to that, another woman, [REDACTED], was granted an Order of Protection against him as well. When my pregnancy was confirmed to him directly by One Medical Kierland, the nurse practitioner was concerned enough about his reaction to it that she requested to speak to me alone about whether or not I felt safe, and notated it.

On March 4th, 2022, just hours before I was nearly killed in the incident described above, I received an unexpected email from Mr. Woodnick. Without a subpoena, he had somehow obtained the complete 221 page case file of the CLETS restraining order against my ex-boyfriend in San Francisco, Mr. Michael Marraccini, that has been in place since 2018. Mr. Woodnick should not have been able to access that file, part of which was confidential, without involving Mr. Marraccini. Mr. Gillespie was aware of the fact that Mr. Marraccini's physical abuse caused me to have brain damage, which resulted in me developing epilepsy at the age of 27. Mr. Woodnick knowingly connected the two men I have protective orders against, Mr. Gillespie and Mr. Marraccini, which has left me terrified.

My now former attorney, Ms. Kari Ramos, was aware of the events of March 4th and their possible involvement since before she filed into the case. I reported Ms. Ramos to the Arizona Bar on June 13th, after she filed a Motion to Withdraw from the case after I told her that I had recorded a phone call with her where she said that she "totally could have" filed an Amended Answer to the Second Motion to Dismiss/Motion for Judgment on the Pleadings to correct her error in filing responding to the First Motion to Dismiss, filed in September 2021, rather than the Second Motion to Dismiss/Motion for Judgment on the Pleadings. In addition to the more clear potential violations, there is reason to believe that Ms. Ramos may have colluded with the other side. The Arizona Bar has not completed reviewing the mountain of evidence I provided them with, but I have been in frequent communication with intake counsel Reid Potter, who told me in our last conversation that he was going to speak to Mr. Woodnick.

As I have submitted in prior filings, Mr. Woodnick has acted unethically throughout the case, starting with contacting a attorney in California who he knew to be a longtime family friend, Joe Cotchett, and claimed that he believed him to be representing me in a Title 25 case in an effort to embarrass me. That clearly was not what I filed in CV2021-052893, and divulging information regarding my pregnancy to Mr. Cotchett was

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Gmail - Fwd: FW: CV2021-052893 - important

horrifying, especially since Mr. Gillespie knew that Mr. Cotchett was representing my father in a severance case at the time. Despite Mr. Cotchett writing a one-sentence email back saying that he did not represent me, Mr. Woodnick sent four additional emails without a response in a bizarre attempt to frame me for fraud, demanding that Mr. Cotchett spoke to me about dropping the case. Mr. Woodnick even emailed me saying that he was sure that my 'Uncle Joe' (a nickname for Mr. Cotchett) had warned me that Mr. Gillespie would be filing "a counter petition for a 'fraudulent ultrasound'" if I did not immediately file a Motion to Dismiss. Mr. Woodnick never received a call from or had a conversation with Mr. Cotchett, so this was pure intimidation to get me to drop the case based on an exchange that never took place.

Mr. Cotchett gave permission for me to share a note with the court that he sent me on September 30: "it is an extraordinary story with GILLESPIE. I am glad you are pursuing charges as they [sp] conduct is outrageous - if we can help in any way, do not hesitate to call." Despite the offer, I have declined help from Mr. Cotchett as I would never ask a California attorney, who is not licensed in Arizona, to help me.

As proven simply in his filings on behalf of Mr. Gillespie, Mr. Woodnick has taken every opportunity to insult my character with cruel personal attacks. In addition, despite not having a Scheduling Order, Mr. Woodnick has demanded disclosures and answers to interrogatories, which I provided to Ms. Ramos in a forty-five page document on March 28th. While I was under the impression that she had submitted these to Mr. Woodnick on April 8th, I am guessing at this point that she did not, since he has threatened to file a Motion to Compel against me if I do not provide them immediately. At this point, if he does not already have them, I do not want to give them any confidential information that could jeopardize my safety. The Order of Protection has done nothing to keep Mr. Gillespie from stalking and harassing me, and despite Mr. Woodnick being warned that his unethical behavior would be reported, his intimidation has persisted. Their actions have been frightening enough for me to make the decision to leave Arizona permanently.

Despite Ms. Ramos' Withdrawal, Mr. Woodnick has made it clear to the court that he does not want to allow an Extension for the Oral Hearing scheduled for August 11th, as evidenced in his Response. The attorney I have been speaking to about representing me, Mr. Jason Vendetti, is going to be out of town that day. Both he and Mr. Potter said that regardless, it would be virtually impossible for any attorney to catch up by then and be appropriately prepared to defend a constitutional issue.

Ms. Ramos did not want me to tell the court about anything related to the criminal aspects of this case, but now that I am unrepresented and scheduled to represent myself at the Oral Hearing, I know that I have to. I simply can't explain to Judge Bachus why her granting the Motion to Extend is so necessary without explaining what is going on behind the scenes, and other than an e-mail, I didn't know how to get this message to her. I truly apologize if this is not the proper way to inform her, but hope that both she and you understand the degree of panic I feel at the idea of facing Mr. Woodnick unrepresented, and pray that she will take into account my justified safety concerns in her Ruling on the Motion to Extend.

Thank you!

All the best,

Laura Owens | (415) 810-0604

Co-host of the *'Nobody Told Me'* podcast | Co-CEO of *Quartet Farms*

Watch my *TEDx* talk, the most watched new American *TEDx* talk released in January 2022

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EXHIBIT C