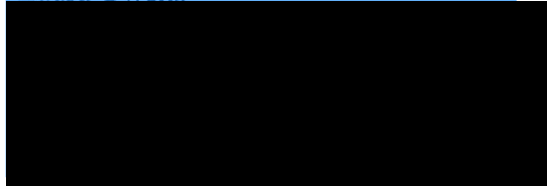


Laura Owens



LAURA OWENS,  
Petitioner in Pro Per

SUPERIOR COURT OF CALIFORNIA  
IN AND FOR THE COUNTY OF SAN FRANCISCO

Case No.: FDV-18-813693

**DECLARATION OF LAURA  
OWENS IN SUPPORT OF  
MOTION TO CORRECT  
AND AUGMENT THE  
RECORD**

LAURA OWENS,  
PETITIONER,

Vs.

MICHAEL MARRACCINI,  
RESPONDENT.

ELECTRONICALLY  
**FILED**  
Superior Court of California,  
County of San Francisco

**12/03/2025**  
Clerk of the Court  
BY: JOSHUA MANDAPAT  
Deputy Clerk

I, Laura Owens, declare as follows:

1. **I am the Petitioner in this matter.** I make this declaration based on my own personal knowledge. If called as a witness, I could and would testify competently to the facts stated herein.
  2. **This declaration is submitted in support of, and to supplement, my Motion to Correct and Augment the Record,** filed concurrently, and is intended to authenticate all referenced exhibits and to provide sworn evidentiary support for the facts set forth in the motion.
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#### **A. November 4, 2025 – Court Directive Regarding Reporter Coverage**

3. On November 4, 2025 at 11:05 a.m., I received an email from Department 405A stating **(Exhibit A)**:

- *“There is a high chance there will be no court reporter coverage tomorrow.”*
- *“Since this is a DVRO trial, the Court needs to continue the trial if any party does not waive the court reporter.”*
- *“Please check your email through the day up to early tomorrow for updates.”*

4. This communication led me to believe — and reasonably so — that the hearing could not legally proceed on November 5 if I did not waive reporter coverage.

5. I reviewed this email immediately and, relying on the Court’s representation, I responded that I would not waive and that I would cancel my planned November 4 travel so I could obtain a refund **(included in Exhibit A)**.

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#### **B. Ex Parte–Effect Reporter Communications Excluded Me Entirely**

6. Before and after the 11:05 a.m. directive, there were additional emails between Court staff and Respondent’s counsel regarding locating and securing a reporter — all without me on the chain.

7. At 10:10 a.m., Respondent’s counsel asked the Court:

- *"May we have a remote court reporter if we can't find someone in person?"*

I was not included.

8. At 3:32 p.m., Court staff emailed Respondent's counsel:

- *"Is this reporter certified??"*

I was not included.

9. At 3:42 p.m., Respondent's counsel wrote:

- *"We have successfully secured a court reporter for the proceedings tomorrow."*

I was not included.

10. I did not receive any of these communications until 4:40 p.m., when I was finally added to the chain (**Exhibit A**).

11. These communications directly affected whether the hearing could legally take place under Gov. Code § 68086 and CRC 2.956, and my exclusion prevented me from asserting my rights in real time.

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### **C. My Immediate Objection and Non-Waiver**

12. Once finally added at 4:40 p.m., I immediately objected to the appointment of a privately retained reporter and stated in writing:

- *"I respectfully object to the Court's appointment of Heather Bautista (CSR #11600) as the reporter pro tempore."*
- *"I do not waive my right to a court reporter."*
- *"I was excluded from earlier communications."*
- *"I was not notified until approximately 4:40 p.m. Arizona time that one might be secured, and not until 5:08 p.m. that one definitively had been."*

13. I intended this objection to be part of the record. It does not appear in the Mini-Minutes.

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#### **D. Last-Minute Efforts to Appear: The 5:08 p.m. Flight**

14. At 5:08 p.m. Arizona time, I finally received confirmation that a reporter had been secured and that the November 5 hearing might indeed proceed.
15. Within minutes, I purchased an urgent last-minute flight to San Francisco departing early the next morning so I could appear in person.
16. I emailed the flight confirmation to the Court the same evening. True and correct copies are attached as **Exhibit B**.
17. This demonstrates that once updated information was provided, I did everything within my power to appear.
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#### **E. Medical Emergency on November 5, 2025**

18. Late on November 4 and into the early morning hours of November 5, I experienced multiple episodes of vomiting blood — a life-threatening recurrence of prior gastrointestinal bleeding.

19. I sought emergency medical care at HonorHealth Hospital, where I was admitted.

20. At 6:21 a.m., I emailed the Court and all counsel (**Exhibit A**):

- *“I am unable to appear due to a sudden and serious medical emergency.”*
- *“I experienced multiple severe medical episodes involving vomiting blood.”*
- *“My physicians have emphasized that this symptom is serious.”*
- *“I am at the emergency room now and they are admitting me.”*

21. At 7:11 a.m., Court staff responded:

- *“Email received. Thanks.”*

22. At 6:53 a.m., I sent a second update:

- *“I am being admitted and will require the under-anesthesia procedure to be done. They expect I will not be released until tomorrow.”*

23. At 7:33 a.m., the Court again confirmed:

- *“Good morning Ms. Owens. Email received. Thanks.”*

24. These emails are included in **Exhibit A**. Medical records, including vitals and testing, are attached as **Exhibit C**.

25. Despite this, the Mini-Minutes reflect only:

*“Petitioner is not present.”*



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#### **F. Offer of HIPAA Authorization**

26. In my November 5 email, I explicitly stated:

- *"I am more than willing to execute HIPAA releases for the Court and opposing counsel."*
- *"I can provide medical documentation as soon as it becomes available."*

27. Neither the Court nor opposing counsel requested verification before seeking or obtaining dismissal.

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#### **G. Opposing Counsel's Silence Despite Being Copied on Emergency Emails**

28. Respondent's counsel, including attorneys Omar Serrato and Rachel Juarez, were copied on all of my November 5 medical-emergency emails.

29. They therefore had actual knowledge that I was in the hospital, under evaluation for gastrointestinal bleeding, and would undergo a procedure under anesthesia.

30. Despite this, they remained silent when the Court called the case and stated only that I "did not appear."

31. Respondent's counsel did not inform the Court of the emergency, did not confirm receipt of my emails, and did not disclose that the Court had already acknowledged my hospitalization.

32. Their silence contributed materially to the misleading record and is relevant to candor under Rule 3.3 of the California Rules of Professional Conduct.

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#### **H. Bar Complaints Against Respondent's Counsel**

33. I filed two State Bar complaints before the hearing:

- Complaint No. 25-O-29980 (Juarez), filed Nov. 2, 2025 (**Exhibit E**)
- Complaint No. 25-O-29607 (Serrato), filed Nov. 3, 2025 (**Exhibit F**)

34. These complaints arose from conduct in this litigation and provide context for omissions and candor issues.

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#### **I. Post-Dismissal Harassment and Misrepresentation**

35. Following the dismissal, Respondent and his attorneys appeared on:

- Inside Edition
- The Megan Fox Show
- The Tilted Lawyer (YouTube)

36. These videos generated significant harassment and threats toward me.

37. Respondent and counsel falsely stated or implied that prior DVROs had been “vacated,” that the dismissal was on the merits, and that my medical emergency was fabricated.
38. This conduct is directly relevant to “disturbing the peace” under Family Code § 6320.
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#### **J. Counsel’s Admission That the Record Was Left Incomplete**

39. On November 18, 2025, during an interview on “The Tilted Lawyer,” attorney Omar Serrato stated at approximately 44:11–44:24 (**Exhibit G**):

- *“I’m not worried about her appeal. Let her appeal. Luckily because the judge didn’t make us make a record, her options for appeal are severely limited.”*

40. This statement confirms:

- The record is incomplete,
  - Opposing counsel knows it is incomplete,
  - Opposing counsel views the incompleteness as strategically advantageous, and
  - The omissions materially prejudice my appellate rights.
-



## **K. Authenticity of Exhibits**

41. Attached hereto as Exhibits A–G are true and correct copies of:

- Relevant emails
  - Flight confirmation
  - Medical records
  - Bar complaints
  - Post-dismissal media statements
  - Transcript excerpts
  - Screenshots or printouts of referenced recordings
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## **DECLARATION UNDER PENALTY OF PERJURY**

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

*Dated:* December 3, 2025

**Laura Michelle Owens**    /s/

Petitioner, In Pro Per