2015-1-FL-172816

**Electronically filed** 1 B J Fadem Esq. SBN: 118819\* by Superior Court of CA, \*Certified Family Law Specialist - State Board of Specialization County of Santa Clara, Scott A. Reno, Esq. SBN: 315247 on 9/1/2022 10:15 AM Erika A. Lee, Esq. SBN: 332907 Reviewed By: L. Imasa LAW OFFICES OF B J FADEM & ASSOCIATES, APC 3 Case #2015-1-FL-172816 111 West Saint John Street, Suite 700 Env. #9864295 San Jose, CA 95113 Telephone: 408-280-1220 Fax: 408-971-9940 5 bjfadem@fademlaw.com 6 Attorney for Petitioner, 7 RESHMA KUMAR 8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA IN AND FOR THE COUNTY OF SANTA CLARA 9 Case No.: 2015-1-FL-172816 10 RESHMA KUMAR, Petitioner, DECLARATION OF ATTORNEY IN 11 SUPPORT OF RESPONSIVE DECLARATION TO REQUEST FOR VS. 12 **ORDER** DAYA BARAN, 13 Respondent. 14 15 I, Nicole Ford, Esq., am an attorney, and if called upon I could and would testify as follows: 16 1. Respondent's Request for Order is simply another link in a chain of harassment and abuse 17 that he has put Petitioner, their daughter, counsel, and the Court through for the past 8 18 years. 19 2. After the Domestic Violence Restraining Order was granted and Petitioner moved to a 20 different state, Respondent continued his abuse and harassment in online forums. 21 Respondent uses his Twitter account (@daya baran) to lodge daily allegations of abuse 22 towards Petitioner, her family, counsel and the Court. He has also created a website 23 24 KUMAR vs. BARAN Declaration of Nicole Ford, Esq.

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- (freeariana.org) that includes accusations like those outlined on his Twitter account and in his Ex Parte Request for Order.
- 3. In these online forums, Respondent has found camaraderie with other vexatious litigants and persons who have similarly threatened counsel like Susan Bassi and Julie Haskell.
- 4. Julie Haskell is the paternal aunt of one of counsel's minor's counsel cases. As her brother's case progressed, Ms. Haskell would take to Twitter daily to rant about counsel. In these rants, Ms. Haskell often referred to counsel as "pedophile," "child abuser," or a "fraud on the court." Respondent would often engage with and respond to these tweets.
- 5. Likewise, Ms. Haskell also began tweeting about Respondent's case, often in the same tone as Respondent would. Her tweets included links to Respondent's website and further allegations towards Petitioner, her family, counsel and the Court.
- 6. In response to Ms. Haskell's defamatory rants, counsel filed a Request for Civil Harassment Restraining Order. A Temporary Restraining Order was granted on June 30<sup>th</sup>, 2022. The parties Stipulated to a One Year CLETS Restraining Order against Ms. Haskell on August 11<sup>th</sup>, 2022. Two weeks later, on August 26<sup>th</sup>, 2022, Respondent filed his Ex Parte Request for Order.
- 7. The amount of time between Ms. Haskell's stipulation to Civil Harassment Restraining
  Order and Respondent's Ex Parte Request for Order is no coincidence. The two have been
  fostering an online friendship for months over their mutual disdain for counsel. This
  online friendship eventually developed and Ms. Haskell and her husband had dinner with
  Respondent. Both have no regard for the Court's order. Ms. Haskell, even after the
  stipulation to the Civil Harassment Restraining Order was filed, has continued her pattern
  of defamatory remarks on her Twitter account in violation of the Restraining Order.

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Likewise, Respondent has consistently used online forums and the Court to harass Petitioner and their daughter in violation of the Domestic Violence Restraining Order. Thus, Respondent's Ex Part Request for Order came as no surprise.

8. Respondent's Ex Parte Request for Order is nothing more than a furtherance of this online friendship and his narrative of harassment towards Petitioner, their daughter, counsel and the Court. As such, the Court should deny Respondent's request.

The statements above are true to the best of my ability and under the penalty of perjury under the laws of the State of California.

Executed this day of August 31, 2022, in San Jose, California.

NICOLE FORD, ESO.

Attorney for Petitioner

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# EXHIBIT A



Q ti

Show this thread







#### $\leftarrow$ **Thread**

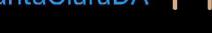
name of lining their pocketbooks.

@BJFademLaw @santaclaralaw

🧐 daya\_baran @daya\_baran ⋅ 25 Dec 21

## @SantaClaraDA 🖣 🖣 🖣





#pedophile #ganrajkumar and his son #vikaashkumar who tried to #murder me by poisoning are hiding using #DomesticViolence protection. California law is for sale #corrupt #judge #cynthialie #bjfadem #nathalieferro #joep...

8:36 AM · 26 Dec 21 · Twitter for iPhone

### 3 Likes







## More Replies



daya\_baran @daya\_baran · 26 Dec 21 Replying to @justiceforsib @BJFademLaw and 2 others

Dont forget #corrupt judge #cynthialie corrupt DA #katrinaohde and corrupt policeman #joeperez. It was paid for using my money which my ex stole.

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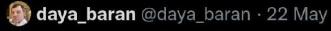
draft of @daya\_baran website.

@BJFademLaw @santaclaralaw

@SCSCourt @SantaClaraDA #fraud

#familycourtcorruption. #pedophile
freearianna.org. We will fight for you

Arianna. #CynthiaLie.



Replying to @TigerCub1973 @Stopfoxstop and 8 others

People are cathing on @justiceforsib. They are all #frauds starting with California AG #robbonta. That is why I started a site to recall these parasitic vultures freearianna.org. Start your recall.

7:01 PM · 22 May 22 · Twitter Web App

1 Quote Tweet 5 Likes



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daya\_baran @daya\_baran · 23 May

Replying to @justiceforsib @BJFademLaw and
3 others

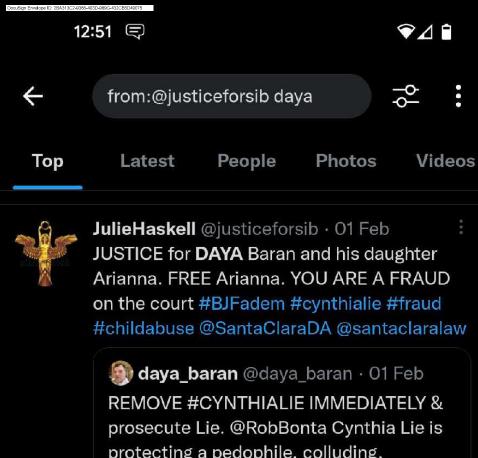
Their day is coming and soon.











protecting a pedophile, colluding, profiting from it, violating oath of office, serious human & constitutional rights vi...

Date: Tue, Feb 1, 2022 at 10:18 AM Subject: Re: Remove Cynthia Lie Immediately

To: <gov@gov.ca.gov>, <Eleni.Kounalakis@ltg.ca.gov>, <rob.bonta@doj.ca.gov>, <Jon.Allin@doj.ca.gov>, <coja@jud.ca.gov>, <mary.greenwood@jud.ca.gov>,

<gavin newsom@gov.ca.gov>

#### Dear

Governor Gavin Newsom.

Lt. Governor Eleni Kounalakis,

Attorney General Rob Bonta,

Chief Justice Tani Cantil-Sakauye,

President Judge Mary J. Greenwood:

Bringing to your attention again. Cynthia Lie is involved in protecting a pedophile, colluding, profiting from it, violating the oath office, serious human rights violations, constitutional rights violations and betraying the public trust. Cynthia Lie is corrupt and UNFIT TO SERVE in public office. Cynthia Lie has to be removed immediately and prosecuted.

This is a SERIOUS, SERIOUS, SERIOUS matter and it requires all of your immediate attention.

Daya Baran



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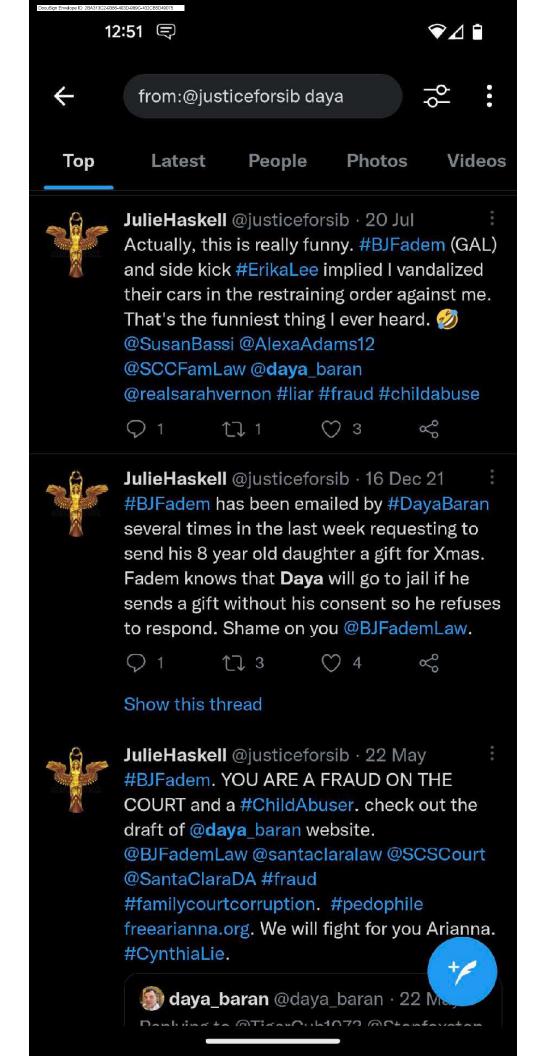
&

Show this thread



JulieHaskell @justiceforsib · 26 Dec 2 #BJFadem and #nathalieferro took Daya's











Daya is rightfully upset. #BJFadem #NathalieFerro #CynthiaLie made \$\$ \$\$ silencing, destroying, ruining his & his daughter's life. Father & daughter haven't seen each other in 6 yrs.

**#CHILDABUSE @SantaClaraDA** 

3:16 PM · 29 Nov 21 · Twitter Web App

1 Retweet 2 Likes









## **More Replies**



daya\_baran @daya\_baran · 29 Nov 21 Replying to @justiceforsib and @SantaClaraDA

Newsome appointed #cynthialie to appellate court. She is a #racist #feminist #biased lacks judgement betrayed public trust. She destroyed many families to advance her political goals, profited by destroying their lives. She has no business being a judge google.com/search?q=cynth...





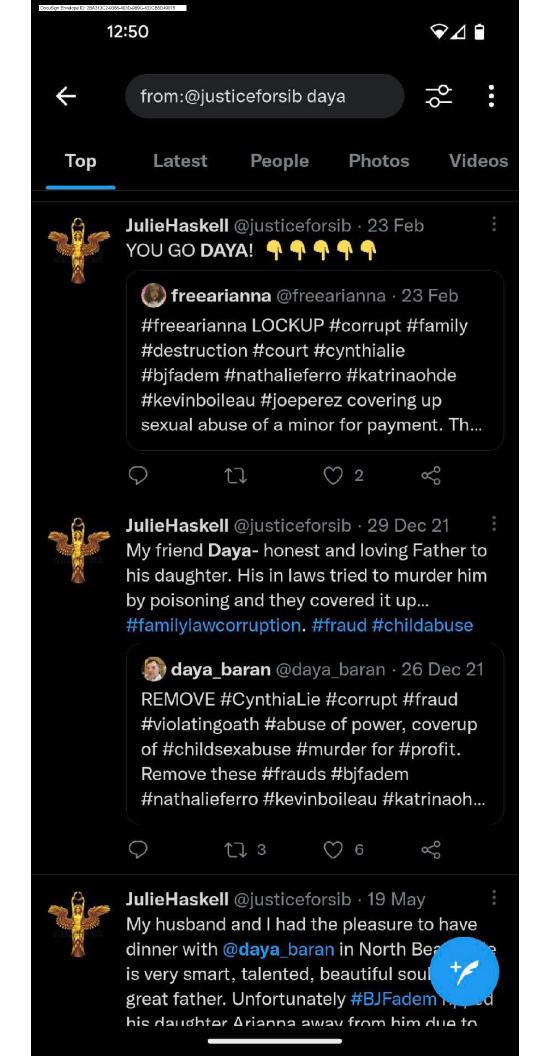


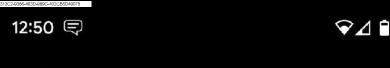


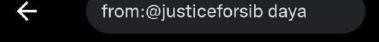


Tweet your reply









Top Latest People Photos Videos



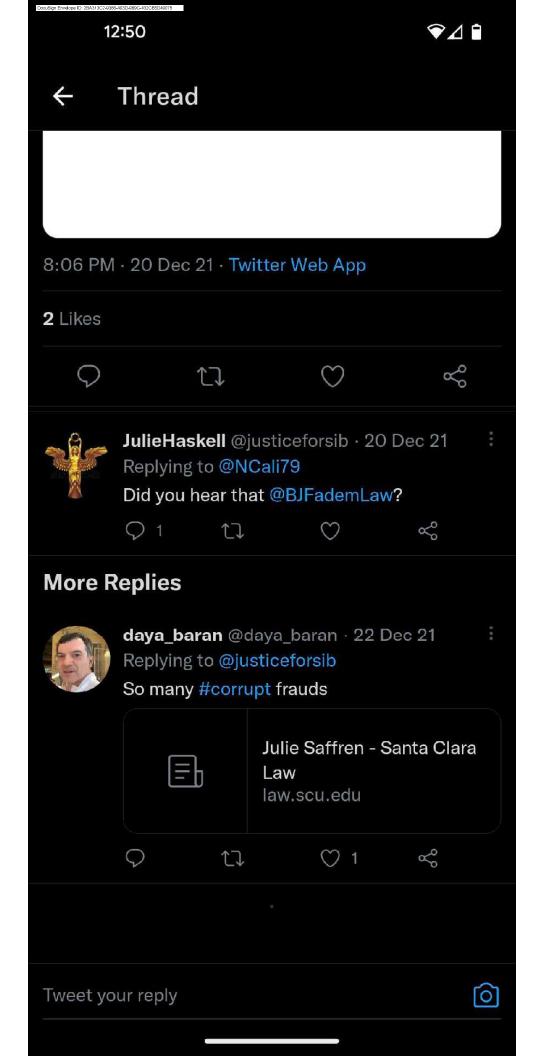
JulieHaskell @justiceforsib · 19 May
My husband and I had the pleasure to have
dinner with @daya\_baran in North Beach. He
is very smart, talented, beautiful soul and
great father. Unfortunately #BJFadem ripped
his daughter Arianna away from him due to
billionaire #pedophile father-in-law. Arianna
is now fatherless.





JulieHaskell @justiceforsib · 04 Mar
This yelp review is identical to my brother's experience with Marcia Clark reunification therapist. It's a formula the courts use.
Marcia Clark is a child abuser. @SCSCourt @SantaClaraDA #fraud #childabuse
@SusanBassi @daya\_baran #mariaclark











Here's what #BJFadem said to Daya Baran when he asked to send his daughter a Xmas gift. His daughter probably cries every night. YOU ARE A CHILD ABUSER and you covered up a #murder to cover up a #pedophile all for \$\$\$ #BJFadem #Childabuse.

On Tue, Dec 7, 2021 at 2:48 PM BJ Fadem < bifadem@fademlaw.com> wrote:

Don't know who you are addressing - nobody by that name at this email

With Respect,

#### B J Fadem, Esq. [he/him/his]

Principal Attorney

LAW OFFICES OF B.J FADEM & ASSOCIATES, APC
11. W. St. John Street, Suite 700
San Jose. CA 95113

VOICE: (408) 280-1220

FAX: (408) 971-9940 www.fademlaw.com bifadem@fademlaw.com

Our Office Hours are: M-Thur: 9:00am to 5:00pm Friday: 9:00am to noon

From: Daya Baran < doaran@gmail.com>
Sent: Tuesday, December 7, 2021 2:36 PM

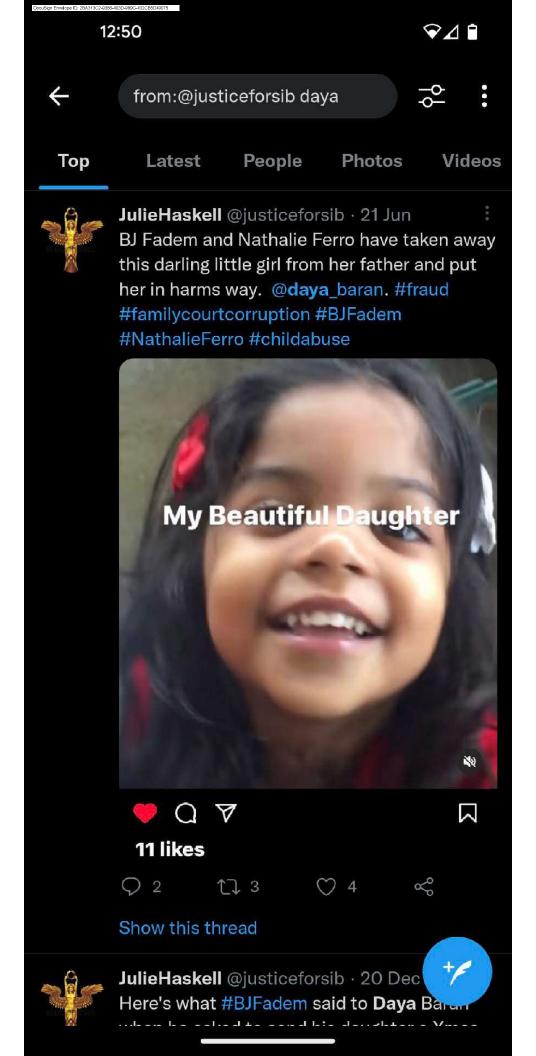
To: Shampelle Byrd <<u>shampellebyrd@fademlaw.com</u>>; BJ Fadem <<u>bifadem@fademlaw.com</u>>

Subject: Fwd: Arianna's Christmas Gi

Brenda Joy:

1. I would like to send my daughter a Christmas gift. Can you get it to her? Can you let me know by 12-9 -2021 so that she could receive it in time.







## ← Tweet



JulieHaskell @justiceforsib · 21h

Note to you Venessa Zecker. You recused yourself from my brother's family law case because you know you did my brother wrong. You silenced him and would not allow him to defend himself. YOU KNOW what I'm talking about with your sneaky DEAD END RFOs. More details soon @SCSCourt

Q 1 1 1

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So



daya\_baran @daya\_baran · 2h
Replying to @justiceforsib and @SCSCourt
Why would #VanessaZecher go from

#criminalcourt to #familycourt - something is fishy. @Jeff\_Rosen @SusanBassi

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**JulieHaskell** 

@justiceforsib

Replying to @daya\_baran @SCSCourt and 2 others @SusanBassi knows the answer to that.

3:51 PM · 30 Aug 22 · Twitter Web App

1 Quote Tweet



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S

Tweet your reply

