

CIVIL COURT OF THE CITY OF NEW
YORK COUNTY OF New York PART:

STEPHEN G RUSSELL

Plaintiff,

AFFIDAVIT
IN OPPOSITION

-against-

Index No. 151090/2021

Rashmi Narendra

Defendant.

STATE OF NEW YORK
COUNTY OF New York ss.:

TARA WALSH, being duly sworn, hereby deposes and says:

Mr. Russell and I share a 3 year old daughter together. When I made the decision to terminate our relationship close to three years ago, Mr. Russell has been on a war path to cause chaos, stress and harm in my life. Unfortunately, this harassment has extended to everyone close to me, which includes my family members and friends. Mr. Russell currently has numerous actions against me in both California and New York. Although I was never a resident of California, he is still able to manipulate the court system in his home state as a means to make things very difficult for me financially. To date, I have spent my entire life savings fighting him in court. Thus far, the courts in my home state of New York have greatly protected our daughter and I. I have full legal and physical custody of our daughter in New York, as well as a long-standing Order of Protection against Mr. Russell until 2022 (she has provided as EXHIBIT 1). Mr. Russell tried to sue me in New York for the same exact claims he made in his California lawsuit. The New York Supreme Court, granted my motion to dismiss the lawsuit (EXHIBIT 2). I have desperately tried to get California to do the same, but it has been a great challenge. To date, I have contacted dozens of organizations both nationally and in California for assistance, but the options are extremely limited.

In Mr. Russell's submissions to enforce these subpoena's he cites I am counter suing him in California. This is completely false. At a hearing on October 6, 2020, I represented myself to the San Francisco court. I pleaded the judge to dismiss my counter suit as Mr. Russell was using

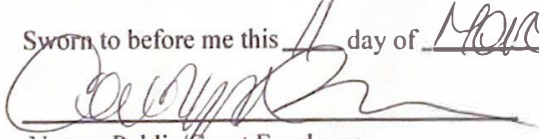
~~it as a means to harass and stalk my friends and family with servers and endless paperwork~~—As a favor, the judge signed an order my cross complaint would be automatically dropped if I did not sign certain authorizations. I never signed those authorizations so my cross complaint is no longer active (EXHIBIT 3). To date, no judge in California has signed any order that my family and friends need to give depositions. All of them are residents of New York and barely know Mr. Russell. In fact, for Mr. Russell's lawsuit, he only has named two expert witnesses. Neither of these are my family or friends (EXHIBIT 4). I know NY courts have thrown out any formal judicial intervention attempts to enforce similar subpoena's (EXHIBIT 5). I ask the court to dismiss this completely misleading request for a subpoena's from my friends and family. They have gone great lengths to protect, care and support both myself and our daughter. Any information Mr. Russell extracts from my friends and family will be used as a means to stalk and further harass me. Mr. Russell is a man of great financial wealth, so the hundreds of papers he presents to ALL courts may give the appearance of legitimacy. Just recently, Mr. Russell sent me an email offering to end all his court pursuits if I give into his demands (EXHIBIT 6). There is no criminal investigation or anything of that nature open in any courts against me. This one civil case in California is his only lawsuit left where he could have any excuse to harass those close to me. He never has had any

intention to proceed with a civil lawsuit in California. Attached are some police reports I have had to file (EXHIBIT 7).

WHEREFORE, THE UNDERSIGNED RESPECTFULLY REQUESTS THE WITHIN MOTION BE DENIED.

Signature 

Sworn to before me this 11 day of MARCH 2021


Notary Public/Court Employee

CAROLYN ROTTJER
NOTARY PUBLIC- STATE OF NEW YORK
No. 01RO6318403
Qualified in Putnam County
My Commission Expires January 26, 2023

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