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6 *Attorneys for Petitioner*

7 *Stephen Russell*

ENDORSED
FILED
San Francisco County Superior Court

JUL 18 2019

CLERK OF THE COURT
DAMON CARTER

BY: _____ Deputy Clerk

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 COUNTY OF SAN FRANCISCO

10 In re:

Case No. FPT-18-377425

11 STEPHEN G. RUSSELL,

PETITIONER STEPHEN G. RUSSELL'S
SUPPLEMENTAL DECLARATION IN
SUPPORT OF HIS REQUEST FOR A
DOMESTIC VIOLENCE PROTECTIVE
ORDER

12 Petitioner,

13 and

14 TARA K. WALSH,

Date: July 31, 2019

Time: 8:30 a.m.

Dept.: 404

15 Respondent.

Request for DVRO Filed: June 3, 2019

18
19 AND NOW, Petitioner, STEPHEN G. RUSSELL, by and through his undersigned counsel
20 submits the following Supplemental Declaration in further support of his Request for a Domestic
21 Violence Protective Order.

22 Respectfully submitted:

23 DATE: July 18, 2019

ENENSTEIN PHAM & GLASS

24
25 BY:

Ruth Dayan Eget
Ruth Dayan Eget, Esq.

Darren S. Enenstein, Esq.

Attorneys for Petitioner,

STEPHEN G. RUSSELL

26
27
28 PETITIONER STEPHEN G. RUSSELL'S SUPPLEMENTAL DECLARATION IN SUPPORT OF HIS
REQUEST FOR A DOMESTIC VIOLENCE PROTECTIVE ORDER

RECEIVED
FAXED

1 **DV-100, RECENT ABUSE**

2 **SUPPLEMENTAL DECLARATION OF STEPHEN G. RUSSELL**

3 I, Stephen G. Russell, declare as follows:

4 1. The following information is based upon my personal knowledge, and if called
5 upon to testify thereto, I could and would do so competently. I submit this Declaration in further
6 support of my Request for a Domestic Violence Protective Order against Tara Katelyn Walsh
7 (“Ms. Walsh”), my former girlfriend and the mother of our one-year old daughter, Evelyn (“Evie”),
8 in light of new evidence discovered in the course of ongoing discovery.

9
10 **I. BRIEF BACKGROUND OF ADDITIONAL EVIDENCE DISCOVERED AFTER
11 THE JUNE 3, 2019 DVRO FILING AND AFTER THE JULY 3, 2019 HEARING
12 DATE ON THE DVRO**

13 2. Through discovery in the pending civil action against Ms. Walsh entitled *Russell v.*
14 *Walsh*, SFSC Case No. CGC-18-570137, I have discovered disturbing evidence that solidifies and
15 reinforces my fears that Ms. Walsh is continuing to engage in a pattern of abuse and harassment
16 designed to intimidate me and cause me anxiety. As previously detailed to this Court, Ms. Walsh
17 physically assaulted me, surreptitiously drugged me with anti-psychotic medication prescribed to
18 her, Seroquel, (causing me severe fatigue and confusion), and also has more recently verbally
19 threatened to release compromising and embarrassing videos of me. Specifically, the new evidence
20 reveals the following:

- 21 • Ms. Walsh did in fact surreptitiously take video and audio
22 recordings of me during my state of confusion to blackmail and
23 extort me. As detailed below, Ms. Walsh has produced various
24 video and audio recordings taken without my knowledge or
25 consent. The manner in which these recordings were taken indicate
26 the great lengths Ms. Walsh went to conceal her phone from me
27 while making these recordings.
- 28 • Ms. Walsh submitted an audio recording with a corresponding
transcript of a telephone conversation with me in which Ms. Walsh
makes an *explicit threat* that she has a “bunch of” videos and photos

1 of me, including “stuff [I] haven’t seen yet,” that she will release
2 if I refuse to submit to her demands.

- 3 • Ms. Walsh also produced correspondence in which Ms. Walsh tells
4 a third party that she may just feign a relationship with (including
5 marrying me) for monetary gain as that would be “sweet revenge.”
6 Additionally, Ms. Walsh stated to the same third party that there
7 was “almost a guarantee” that she would “explode” and cause me
8 “physical harm” if she moved back to San Francisco.

9 3. Two things are now clear beyond a measure of doubt – (1) Ms. Walsh took and has
10 compromising and embarrassing videos of me, and, (2) Ms. Walsh has threatened to release them
11 publicly if I don’t do what she demands. These admissions by Ms. Walsh, along with Ms. Walsh’s
12 admissions to drugging me, past physical abuse, and prior threats to release embarrassing and
13 compromising videos of me, have caused me heightened anxiety and have only confirmed my fear
14 that Ms. Walsh will go to any lengths to harm me and my reputation.

15 **II. PROCEDURAL BACKGROUND OF ADDITIONAL AND NEWLY DISCOVERED** 16 **EVIDENCE**

17 4. As detailed in the May 30, 2019 Declaration of my attorney Ned Gelhaar, on
18 December 10, 2018, we propounded discovery on Ms. Walsh, including a Request for Production
19 of Documents, Set One, in connection with a pending civil action against Ms. Walsh entitled
20 *Russell v. Walsh*, SFSC Case No. CGC-18-570137. Due to Ms. Walsh’s non-compliance and after
21 multiple meet and confer attempts, we had no choice but to file a Motion to Compel against Ms.
22 Walsh which was set for hearing on June 10, 2019. The Motion to Compel included Request for
23 Production, Set One (“RPD”), category No. 30, which requested the following records: all “...
24 photographs, videotapes, recordings, and/or reports by third parties . . .” in Ms. Walsh’s
25 possession, custody or control.

26 5. My Motion to Compel was granted in full and Ms. Walsh was ordered to serve a
27 further response to the RPD, and to produce any and all documents responsive to RPD category
28 Nos. 28, 29, and 30 without objections other than for attorney-client privilege on or before June
30, 2019.

1 6. Ms. Walsh was also ordered to pay me the sum of \$5,000 as a monetary sanction
2 on or before June 30, 2019. Ms. Walsh was further ordered to comply with our Joint Stipulation
3 Regarding Discovery Dispute dated April 18, 2019. A true and correct copy of the June 17, 2019
4 Order Granting Plaintiff's Motion to Compel Further Response/Compliance and Request for
5 Monetary Sanctions along with the Joint Stipulation (Exhibit "1" to the Order) are attached hereto
6 as **Exhibit "A."**

7 7. On June 28, 2019, Ms. Walsh's counsel produced further responsive documents
8 and media pursuant to the Court's June 17, 2019 Order. A true and correct copy of the e-mail
9 enclosing the Dropbox link with the responsive records is attached hereto as **Exhibit "B."** On July
10 5, 2019, Ms. Walsh's counsel produced supplemental further responsive records that were
11 "inadvertently omitted" from the production on June 28, 2019. A true and correct copy of the letter
12 enclosing the link is attached hereto as **Exhibit "C."**

13 **III. MS. WALSH'S DOCUMENT PRODUCTION PROVIDES ADDITIONAL CONCRETE**
14 **PROOF THAT SHE HAS THREATENED ME AND IS ATTEMPTING TO EXTORT**
15 **ME**

16 8. Ms. Walsh's July 5, 2019 supplemental production included a document Bates-
17 stamped "WALSH_005694," and titled "Audio: Walsh 4056." The document accurately reflects a
18 conversation between me and Ms. Walsh that occurred in or around November 2018. A true and
19 correct copy of the transcript is attached hereto as **Exhibit "D."** A corresponding audio file 18
20 minutes and 24 seconds in length was also produced Bates-stamped WALSH_004056.m4a. A true
21 and correct copy of the audio recording entitled "WALSH_004056.M4A" is attached hereto by
22 USB Drive as **Exhibit "E."**

23 9. During this call, Ms. Walsh and I discussed our custodial arrangements and a
24 potential parenting plan that would involve Ms. Walsh moving back to San Francisco with our
25 minor daughter, Evie. Within the conversation, I expressed my concerns about Ms. Walsh and our
26 minor daughter continuing to live with Ms. Walsh's family given their history of dysfunction and
27 Ms. Walsh's mental illness. In response, as reflected in the transcript produced by Ms. Walsh, the
28 following exchange occurs:

1 Tara: "I have a bunch of videos. I have a bunch of [pho...¹]...I have
2 stuff you haven't seen yet. I do not think you want to pursue this
3 civil court thing Steve. I really don't want to go this route. You
4 should not be taking this route. You need to be reasonable. Like I'm
5 sorry..."

6 Steve: "I hear you that you're threatening me and you say you've got
7 things that are embarrassing to me."

8 Tara: "No, Steve. I'm telling you because I don't want to go there. I
9 don't want to be at war with you."

10 See **Exhibit "D,"** Page 4, Bates-stamped "Walsh_005697."

11 10. I understood and still understand this to be an unequivocal threat that Ms. Walsh is
12 going to release embarrassing and compromising videos and/or photos of me if I refuse to meet
13 Ms. Walsh's demands. This evidence is further proof that my concerns are legitimate and Ms.
14 Walsh did in fact make these threats against me. I remain incredibly fearful that without a
15 restraining order in place Ms. Walsh will feel emboldened to "make good" on her threats to release
16 the videos.

17 11. My concern is further heightened by Ms. Walsh's production of photos of my
18 various confidential financial records which were stored in private. Ms. Walsh took photos of my
19 W-2s (Bates-stamped Walsh_003425 and Walsh_003426) and various other records, contracts,
20 and letters detailing my stock shares (Bates-stamped Walsh_003421-Walsh_003423) and other
21 confidential, financial information (Bates-stamped Walsh_003612-Walsh_003614) without my
22 consent. I had no knowledge Ms. Walsh had this information in her possession until my review or
23 her further and supplemental production. True and correct [redacted] copies of these photos are
24 attached hereto as **Exhibit "F."** For the purposes of protecting my privacy, I have redacted some
25 identifying information.

26 12. Ms. Walsh also produced the contents of text messages between herself and Matan
27 Gavish (who I understand is now her boyfriend) from February 20, 2018. In this conversation, Ms.
28 Walsh and Mr. Gavish have the following exchange reflected in the produced document Bates-

¹ After listening to the corresponding audio recording, at the 10:00 minute mark when Ms. Walsh makes this threat, she begins to say what I understand as the word "photo." Therefore, I made this addition to the text.

1 stamped as Walsh_004106 and Walsh_004107 and attached hereto, in pertinent part, as **Exhibit**
2 **“G.”:**

3 Ms. Walsh: Steve is trying to blackmail me to move to sf-been such a
4 wonderful experience...No it kind of is bc baby is a lot of work and not
5 sure how I can build or keep business- and he’s taken back his offer to
6 support me here-only if I am there. To be a “family” or else. [sic.]

7 Mr. Gavish: Lawyer up.

8 Ms. Walsh: Well he is going to buy a \$2.3 million dollar apartment in
9 sf and put it in trust under Evie’s name I can also control So his mom
10 said to just come there for a few week then can always sell it and say
11 [middle finger emoji]. [sic.]

12 Mr. Gavish: Trusts can be altered.

13 Ms. Walsh: In what way?

14 Mr. Gavish: You are losing to him already You are being strung along
15 and manipulated. [sic.]

16 Ms. Walsh: Yeah well he’s pushing me into a corner- my dad said
17 having the baby was my idea and my problem. So I have to whatever
18 to survive If I sue him for child support I will get like \$2k a month
19 Which is not enough to live off I’m better pretending I want to be with
20 him and getting the most while I can- then leaving him for good.

21 Mr. Gavish: Okay, have a fun 40 years.

22 Ms. Walsh: More like 6 months...I think he will also marry me if I
23 submit to him then I can just divorce him I really mostly hate him at
24 this point-not sure I can manage to hold myself back. But would be the
25 sweetest revenge if I could.

26 13. Ms. Walsh’s communications not only reveal her desire to take “revenge” against
27 me, but also confirms Ms. Walsh’s intent to defraud me, and that she only feigned being in a
28 relationship to extract money from me. Further, in her communications to Mr. Gavish on February
21, 2018, Ms. Walsh admits her desire to physically harm me and her inability to control herself
from “exploding at some point.”

Ms. Walsh: I think I can stay here and figure out a way to make it work
I think there’s a risk of me exploding at some point if I go to sf and

1 casing (sic.) physical harm to steve- which means the baby could be
2 taken from me. Not risk almost a guarantee [sic.]

3 *See Exhibit "G."*

4 14. Even more distressing is the fact that these communications took place well before
5 Ms. Walsh began threatening me, which suggests Ms. Walsh had been attempting to gather
6 damaging information to be used against me throughout our relationship.²

7 **IV. MS. WALSH PRODUCED PRIVATE VIDEOS OF ME THAT WERE**
8 **SURREPTITIOUSLY TAKEN WITHOUT MY KNOWLEDGE OR CONSENT,**
9 **FURTHER EVIDENCING HER MOTIVE AND INTENT TO PUBLICLY**
10 **DISSEMINATE PRIVATE VIDEOS OF ME AND CAUSE ME IRREPERABLE HARM**

11 15. Ms. Walsh's document and media production also contains numerous video and
12 audio recordings of me taken surreptitiously without my knowledge or consent in the private
13 setting of my own home or while I was engaging in private conduct - such as going to the hospital
14 for treatment. Ms. Walsh and I lived together in our home in San Francisco and it is clear from the
15 various media Ms. Walsh produced in discovery that throughout this time Ms. Walsh was
16 attempting to gather private and potentially embarrassing footage of me that could be used against
17 me. It is clear she had the means and motive to record me, and did in fact engage in a pattern of
18 recording me.

19 16. I believe that describing the videos in full or producing the videos into the public
20 record would cause me irreparable harm. As such, I include a general description of the videos and
21 detail the format in which they were taken. If the Court wishes, I will make the videos for the
22 Court's review available under seal.

23 17. In a video produced and Bates-stamped WALSH_003459.MOV, Ms. Walsh is
24 holding her phone at her side while walking and places the camera on a surface (which I believe
25 to be a table) with the camera lens facing up at herself. While the camera records, Ms. Walsh
26 begins to ask me questions in an obvious attempt to obtain embarrassing footage of me. About

27 ² In another troubling text from Ms. Walsh to Mr. Gavish on March 2, 2018, Ms. Walsh suggests that
28 perhaps Mr. Gavish could "kidnap" Ms. Walsh and Evie, our minor daughter. Specifically stating: Ms.
Walsh: Maybe you can kidnap me and Evie so we don't have to leavel (sic.) really don't want to I just can't
do it on my own. *See Exhibit "G."*

1 halfway through the video, Ms. Walsh looks down at the camera and flips the camera until she is
2 looking at the lens. This suggests that Ms. Walsh had placed her phone with the screen face down,
3 presumably since she did not want me to see the screen showing a recording video, and was using
4 the rear lens of the phone to record the video of me. After she checks to make sure the camera is
5 recording, she asks me questions about my mental state and I respond. About 2 minutes into the
6 video, she presses the phone up against what appears to be her leg and then flips the camera around
7 and turns it off.

8 18. In another video Bates-stamped WALSH_005512.MOV, the video appears to be
9 taken from the backseat of a car while I am sitting in the front passenger seat and speaking. The
10 camera becomes completely dark with only a few lights darting by, which seem to be lampposts
11 along the road reflected in the car window. While the video is recording, Ms. Walsh begins asking
12 me questions. The conversation indicates that Ms. Walsh and I were on the way to the hospital
13 emergency room after an occurrence when I began feeling like I had been drugged. The video
14 ends abruptly as the driver is mid-sentence.

15 19. A video produced and Bates-stamped WALSH_005515.MOV (0:25) is a recording
16 secretly taken of me while I was checking my medication for possible tampering. This was before
17 Ms. Walsh admitted to being the one who was secretly putting her prescription anti-psychotic pills
18 (Seroquel) in my beverages without my knowledge or consent.

19 20. A video produced and Bates-stamped WALSH_005516.m4v is a recording of a
20 person conducting a medical examination kneeling in front of me and checking my eyes with a
21 flashlight. The person describes the effect of different drugs on pupil reactions to light and I am
22 asking questions about it. It appears as if the video was taken from a phone held near Ms. Walsh's
23 lap and close to her body. The camera remains in the same frame nearly throughout the entire
24 video. From my review of the video, the camera is being held very still and deliberately in order
25 to avoid detection.

26 21. The video produced and Bates-stamped WALSH_005517.m4v continues from
27 where the previous video ended. The camera is immediately tilted up at the ceiling and a hand
28 covers it briefly before uncovering it and showing only the ceiling. I am heard speaking to the
same person as in the previous video. At approximately 1:23 into the video, Ms. Walsh's hand taps

1 the phone screen in what appears to be her keeping the phone on and awake as the camera is
2 recording. It is done very rapidly and the camera continues to point only at the ceiling. While Ms.
3 Walsh is tapping the phone to make sure it is still recording, I can be heard breathing in the
4 background while the examination is conducted.

5 22. By way of further example, in a video produced and Bates-stamped
6 WALSH_005582.MOV, I am spending time with our child Evie in our bedroom. While recording,
7 Ms. Walsh begins asking me questions about prescription medication that I was taking while I was
8 playing with Evie and records my responses. I was not aware I was being recorded.

9 23. In a video produced and Bates-stamped WALSH_005540.MOV, the recording
10 begins with the camera pointing directly at me as I am talking to Ms. Walsh from the kitchen of
11 my own home. Ms. Walsh flips the camera up to show part of her own face as I am talking. Ms.
12 Walsh smiles briefly at the camera as if she is turning it off, looks at the camera for a couple
13 seconds, then points the camera up at the ceiling while I continue to talk.

14 24. In a video produced and Bates-stamped WALSH_005710.mov, Ms. Walsh is
15 recording me while holding the phone at her side, in what I believe is an attempt to conceal that
16 she is recording me. While Ms. Walsh is recording, I am showing her what I believed to be security
17 issues around our house. She follows me throughout the video while asking me questions about
18 what I was looking for around the house and what I had found.

19 25. Ms. Walsh produced numerous other videos secretly taken of me while engaging
20 in what I thought to be private conversations and conduct. I had an expectation of privacy in my
21 own home and while seeking medical treatment and she breached that privacy. I did not consent
22 to her taking videos of me nor did I have any knowledge that she was filming me during these
23 times.

24 26. I cannot know what additional other videos and media Ms. Walsh has in her
25 possession or the harm she is capable of carrying out against me and my reputation. Indeed, Ms.
26 Walsh has stated that she has "stuff I haven't seen yet." I am increasingly distressed by the
27 evidence that she admitted to others that she desired "sweet revenge" and to physically harm
28 against me. It is clear that Ms. Walsh never really wanted to be in a relationship with me and began

1 gathering highly sensitive and potentially embarrassing videos of me throughout the time we lived
2 together in an attempt to harm, defraud, and extort money from me.

3 27. In light of my moving papers and this additional newly discovered evidence, I
4 respectfully ask that the Court grant me a permanent Domestic Violence Restraining Order against
5 Ms. Walsh for the maximum period of five (5) years.

6
7 I declare under the penalty of perjury under the laws of the State of California that the
8 foregoing is true and correct.

9 Executed this 18th day of July 2019 at San Francisco, California.

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12 _____
13 Stephen G. Russel
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EXHIBIT "A"

1 DARREN S. ENENSTEIN (SBN 195894)

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9 *Attorneys for Plaintiff and*

Cross-Defendant Stephen Russell

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 COUNTY OF SAN FRANCISCO

12
13 STEPHEN RUSSELL, an individual,

14
15 Plaintiff,

16 vs.

17 TARA WALSH, an individual; and
18 DOES 1-20,

19 Defendants.

20
21 TARA WALSH, an individual,

22 Cross-Complainant,

23 vs.

24 STEPHEN RUSSELL, an individual; and
25 DOES 1-10,

26 Cross- Defendants.

FILED
San Francisco County Superior Court

JUN 17 2019

CLERK OF THE COURT

BY: *[Signature]*
Deputy Clerk

DISCOVERY

Case No. CGC-18-570137

**[PROPOSED] ORDER GRANTING
PLAINTIFF STEPHEN RUSSELL'S
MOTION TO COMPEL DEFENDANT
TARA WALSH TO FURTHER RESPOND
TO AND COMPLY WITH RUSSELL'S
REQUESTS FOR PRODUCTION, SET
ONE, NOS. 28, 29, AND 30, AND FOR
MONETARY SANCTIONS AGAINST
TARA WALSH**

Date: June 10, 2019

Time: 9:00 a.m.

Dept.: 301

Complaint Filed: September 26, 2018

Cross-Complaint Filed: November 2, 2018

Trial Date: October 28, 2019

ORDER GRANTING PLAINTIFF'S MOTION TO COMPEL FURTHER RESPONSES/COMPLIANCE RE
REQUESTS FOR PRODUCTION (SET ONE) AND FOR MONETARY SANCTIONS AGAINST TARA WALSH

JUN 17 2019

1 Plaintiff and Cross-Defendant Stephen Russell's ("Russell") Motion to Compel Defendant
2 and Cross-Complainant Tara Walsh ("Walsh") to Further Respond to Russell's Requests for
3 Production, Set One, Nos. 28, 29, and 30 ("Motion to Compel") came on for hearing on June 10,
4 2019, in Department 301 of the above-entitled court, the Honorable Thomas A. Cohen, judge pro
5 tem, presiding. Ivo Labar, Esq. of Sawyer & Labar appeared on behalf of Walsh, and Joy Llaguno,
6 Esq. of Enenstein Pham & Glass, appeared on behalf of Russell. The Court, having reviewed and
7 considered the moving papers, the opposition, all pleadings, papers, and other documents on file,
8 and good cause appearing therefore, orders as follows:

9 1. Russell's Motion to Compel is GRANTED.

10 a. IT IS HEREBY ORDERED that Walsh serve a further response to, and shall
11 produce any and all documents responsive to, Russell's Requests for
12 Production, Set One, Nos. 28, 29, and 30 without objections other than attorney-
13 client privilege, on or before June 30, 2019.

14 b. IT IS FURTHER ORDERED that Walsh shall comply with the parties' Joint
15 Stipulation Regarding Discovery Dispute dated April 18, 2019, attached hereto
16 as Exhibit 1, and shall produce on or before June 30, 2019 all documents in her
17 possession, custody, and control responsive to Plaintiff's Requests for
18 Production (Set One) Nos. 28, 29 and 30, except for documents withheld on the
19 basis of attorney-client privilege, including but not limited to all of Defendant's
20 COMMUNICATIONS (as defined in the Requests) with (a) Stephen Walsh, (b)
21 Maura Walsh, (c) Matan Gavish, (d) Rosario Ladiere, (e) Rashmi Narendra, (f)
22 Brienne Walsh, (g) Caleb Zipperer, (h) Christopher Ochoa, (i) Jesse Ozeri, (j)
23 Albert Timen, (k) Nir Mamen, (l) George Akkelquist, and/or (m) any other of
24 Plaintiff's Security and Investigative staff, from the date Defendant met
25 Plaintiff to the present (if such exist), that: refer or relate to Plaintiff, refer or
26 relate to Defendant drugging Plaintiff, and Record, refer to, or reflect Plaintiff's
27 conduct, including but not limited to photographs, videotapes, and/or reports by
28

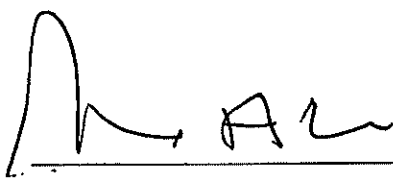
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third parties.

c. IT IS FURTHER ORDERED that Defendant Tara Walsh pay to Plaintiff Stephen Russell the sum of \$ 5,000 - as a monetary sanction, on or before June 30, 2019.

IT IS SO ORDERED.

DATED: June 13, 2019



Hon. Thomas A. Cohen
JUDGE PRO TEM OF THE
SUPERIOR COURT

EXHIBIT 1

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9 *Attorneys for Plaintiff and*
10 *Cross-Defendant Stephen Russell*

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

13 STEPHEN RUSSELL, an individual,
14
15 Plaintiff,
16 vs.

17 TARA WALSH, an individual; and
DOES 1-20,
18 Defendants.

19 TARA WALSH, an individual,
20
21 Cross-Complainant,
22 vs.

23 STEPHEN RUSSELL, an individual; and
DOES 1-10,
24 Cross- Defendants.

Case No. CGC-18-570137

**JOINT STIPULATION REGARDING
DISCOVERY DISPUTE**

Complaint Filed: September 26, 2018
Cross-Complaint Filed: November 2, 2018
Trial Date: October 28, 2019

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JOINT STIPULATION REGARDING DISCOVERY DISPUTE

Plaintiff and Cross-Defendant Stephen Russell ("Plaintiff") and Defendant and Cross-Complainant Tara Walsh ("Defendant", collectively "Parties"), by and through their undersigned attorneys, hereby stipulate and agree as follows:

WHEREAS, on December 10, 2018, Plaintiff served his Requests for Production of Documents (Set One) on Defendant ("Requests").

WHEREAS, on February 15, 2019, Defendant served her written responses to Plaintiff's Requests and began producing purportedly responsive documents.

WHEREAS, having found Defendant's responses and production deficient, on April 3, 2019, Plaintiff filed his Motion to Compel Defendant to Further Respond to Request for Production, Set One, Nos. 28, 29, and 30 ("Motion"). This Motion is set for hearing on April 26, 2019.

WHEREAS, on April 15, 2019, Defendant unequivocally agreed to produce all responsive documents in Defendant's possession, custody, and control responsive to Plaintiff's Requests for Production Nos. 28, 29, and 30, except for documents withheld on the basis of the attorney-client privilege.

NOW THEREFORE, the Parties, through their respective counsel, hereby stipulate and agree to the following:

1. On or before May 3, 2019, Defendant will produce all documents in her possession, custody, and control responsive to Plaintiff's Requests for Production (Set One) Nos. 28, 29 and 30, except for documents withheld on the basis of attorney-client privilege, including but not limited to all of Defendant's COMMUNICATIONS (as defined in the Requests) with (a) Stephen Walsh, (b) Maura Walsh, (c) Matan Gavish, (d) Rosario Ladiere, (e) Rashmi Narendra, (f) Brienne Walsh, (g) Caleb Zipperer, (h) Christopher Ochoa, (i) Jesse Ozeri, (j) Albert Timen, (k) Nir Mamen, (l) George Akkelquist, and/or (m) any other of Plaintiff's Security and Investigative staff, from the date Defendant met Plaintiff to the present (if such exist), that:

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- Refer or relate to Plaintiff
- Refer or relate to Defendant drugging Plaintiff
- Record, refer to, or reflect Plaintiff's conduct, including but not limited to photographs, videotapes, and/or reports by third parties.

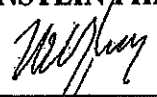
2. Defendant will produce a privilege log of all responsive documents withheld on the basis of the attorney-client privilege (except communications between Ms. Walsh, on the one hand, and her counsel in this matter and family court litigations between Plaintiff and Defendant) by May 3, 2019.

3. The Parties agree that the Motion is withdrawn without prejudice and Plaintiff's time to file a motion to compel as to the Requests is extended until 20 days after May 3, 2019.

SO STIPULATED

DATED this 18th day of April, 2019

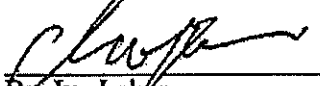
ENENSTEIN PHAM & GLASS



By: Darren S. Enenstein
Ned M. Gelhaar
Attorneys for Plaintiff and
Cross Defendant Stephen Russell

DATED this 18th day of April, 2019

SAWYER & LABAR LLP



By: Ivo Labar
Attorneys for Defendant and
Cross-Complainant Tara Walsh

EXHIBIT "B"

Ruth Dayan Eget

From: Sarah Guzman <guzman@sawyerlabar.com>
Sent: Friday, June 28, 2019 4:53 PM
To: Ned Gelhaar; Darren Enenstein; Nima Kamali; Joy Llaguno; Omar Rodriguez; Michelle Choto
Cc: Ivo Labar
Subject: Russell v. Walsh

Dear Counsel:

Please see link below with Tara Walsh's production volume 4, bates stamped WALSH_003398 to WALSH_005693. The password to access the production will be sent under separate cover. Please let me know if you have any trouble accessing the files.

https://www.dropbox.com/transfer/cap_pid_ft%3AAAAAADw7Rxl8dpnjsPZPJWq_IFBjxkdvv14zUq_IdYCbC4VogQkkN80

Sincerely,

Sarah Guzman
Paralegal

SAWYER | LABAR

201 Mission Street, Suite 2240

San Francisco, CA 94105

415.262.3820

www.sawyerlabar.com

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

EXHIBIT "C"

SAWYER | LABAR

July 5, 2019

VIA EMAIL

Joy M. Llaguno
Enenstein Pham & Glass, LLP
12121 Wilshire Boulevard, Suite 600
Los Angeles, CA 90025
Email: jllaguno@enensteinlaw.com

Re: Russell v. Walsh, San Francisco Case No. CGC-18-570137

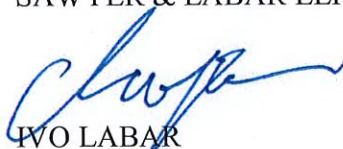
Dear Ms. Llaguno:

The link below contains additional documents that were inadvertently omitted from last week's production. The password will follow by separate email. My client's production is now complete.

https://www.dropbox.com/transfer/cap_pid_ft%3AAAAAALg_mxupLQ_RUeC6PO-SIqo_FC7bQtTa-v26hpc_TOnuGDQTC_0

Very truly yours,

SAWYER & LABAR LLP



IVO LABAR

San Francisco:
201 Mission Street, Suite 2240
SF, CA 94105 P. (415) 262-3820

Los Angeles:
1925 Century Park East, Suite 1700
LA, CA 90067 P. (310) 341-2922

www.sawyerlabar.com



EXHIBIT "D"

Audio: Walsh 4056

Tara: Yes, no.

Steve: You don't remember it. Why?

Tara: I don't remember which one?

Steve: Do you have access to it?

Tara: Just send it to me again.

Steve: Okay, I'll get it to you. Go through it though.

Tara: Okay

Steve: It was a bunch of things that also included a chunk of money.

Tara: I don't care about the money stuff Steve.

Steve: I'm just telling you. I need, you should care about it you need to pay your bills with your attorneys and stuff and you're going to need money to live. You should be spending time with Evie not running around, right?

Tara: I can't come back to live in San Francisco that is not realistic.

Steve: Okay, well we're going to put back an offer that has that. The last one had two options. Any offers you've got you're going to have to come out here until March so that my family can see Evie again. We don't waste money on like three houses.

Tara: Why can't they come here to see her?

Steve: Cause it's not fair to them. You've stolen Evie, I mean, look, I'm going to give you a resolution, we're going to keep going and you're going to lose this. What you did is wrong and you're going to lose.

Tara: How am I going to lose?

Steve: What you did hon is wrong. You have a significant mental illness. You're in your parent's attic because of that mental illness.

Tara: I'm totally stable Steve

Steve: You can't take care of Evie on your own.

Tara: Yes I can. I totally can. I'm totally like stable.

Steve: That's great.

Tara: You haven't been around me.

Steve: I won't tell you the offer. Sounds like you're good. We'll just kind of keep going as is.

Tara: I don't want to keep going as is, what's the offer?

Steve: My offer is going to require you to come to San Francisco. So, don't say you're not going to come to San Francisco as a start off. If you do that there's not going to be any resolution. You get that.

Tara: There's no middle ground thing we can come up with.

Steve: The middle ground is you come to San Francisco through March when we have two houses here. At the end of March my lease is up. The other house is going, is basically being flipped back in [00:02:30] [inaudible] so between now and March you have to come to San Francisco. After that you can live where you want. Okay?

Tara: Yea, but you realize in New York you have friends and like people you know.

Steve: Yea, I get all that. Tara, you're going to be in your parent's attic for the next year that's how long it's going to take. It's like it's not, I can't afford to maintain like four homes.

Tara: Second, third and fourth home.

Steve: I have to get one out there and I had to get one for you. I have two homes in San Francisco. Do the math that's four.

Tara: You wouldn't have to get for me. Who ever said you'll have to get one for me.

Steve: Okay, alright, well then, three. I'd like to through March maintain paying for two homes that I got for you. But, look if you're not open to being here through March then we doesn't have a deal hon, there's nothing else to talk about. Are you not open to being here through March?

Tara: Just send me your, whatever, the agreement.

Steve: I'm already sent it to you hon. You got it. The message I want to send to you is that deal that I sent every week it's going to get worse. We're going to reduce it by a certain amount because you're wasting everybody's time.

Tara: Steve, why can't you be like reasonable, please.

Steve: I'm being reasonable. I offer you a fantastic settlement in August. You've had Evie, you kept her for all this time, that's not reasonable. That's like cruel. Then you basically told a bunch of lies and your attorney out here is going to be in trouble

too because you basically let him make statements that are false. There are sanctions for doing that.

Tara: Steve, the statement you made about me are false though. Like...

Steve: The difference is hon that I don't think they are false. I think they're true. I think they're supported by evidence. The statements you're making, you know to be false and you have no evidence. So, they're different. **[00:04:44] [inaudible]** to be false because you feel that the statements that I'm making about you are false, I guess. But, they're very different. I feel the statements I made about you are true supported by evidence in your own testimony.

Tara: How many law suits do you have going on right now?

Steve: You know, more than I'd like. We want to get rid of this one, it would be great.

Tara: Are you happy in your life right now?

Steve: I'm actually really happy.

Tara: Okay, well, I am too.

Steve: Well great. So, let's settle down. I'd like my daughter though, that you took from me and I'd like my reputation back and I'd like you to take back the lies that you've done. So, those are going to be conditions in the agreement. My view you know, Tara, is that, by you doing what you did I don't have a lot of choice but to try to let the truth come out.

Tara: Yea, Steve. I really don't want to go down this legal route but like...

Steve: Tara, we're down the legal route. What would you like to do to resolve it? We've made several different proposals to you to resolve it and we've never got a single counter proposal from you.

Tara: That's because...

Steve: I can't hear you. I can hear you now.

Tara: Can we just talk tomorrow because this is a lot to take in.

Steve: I don't think we can talk tomorrow. I'm going to have my attorneys present to you the settlement and it's going to have and I don't want to keep being abused by you. I don't like these conversations. I think they're negative. I don't like the fact that you hold out, you send pictures of Evie trying to pull on my heart strings and make me feel bad after not letting me see here. I think it's cruel. If you want to do something try to resolve it. Send over a proposal, answer my proposal, and stop lying. But, we're quickly approaching a window where I don't have any choice, I don't have no recourse but to get the truth out. But, I'll have my day in court. I really need my day in court if you're going to lie.

Tara: And there's no coming to an alternative agreement aside from me moving there?

Steve: Tara, you took Evie away. It's reasonable for you to come out here through March.

Tara: But Steve, I didn't take Evie away.

Steve: Yes you did.

Tara: I didn't.

Steve: You took her.

Tara: If you read the text messages, I wasn't there to stay there for the long term Steve. I didn't even want to come there...

Steve: Court order keeping you in California.

Tara: Steve, I didn't even want to come there to begin with. I wanted to stay in Brooklyn.

Steve: Tara, you took my child and left the state under a lie. Now you pretend like it was justified. It's gross.

Tara: Evie belongs in New York where she's from, where I'm from, where we live. She was born in New York. Why do you feel she belongs in California? Even if I took her under false pretences California didn't even have jurisdiction over her, like read the law.

Steve: There is jurisdiction there. Look I'm happy to have the case keep going. That's the instructions I had given my attorneys, we're pressing criminal charges against you, we're pursuing the custody case, we have a civil case against you. We're using the [00:08:51] [inaudible], we're trying to basically get justice.

Tara: Do you know I talked to other men who have children, they're just like besides themselves horrified like most men if a woman isn't with them they want the woman to be happy so the woman can take care of the child.

Steve: Tara, I think you're mentally ill. I think your family ruin human lives and it's unconscionable to me to let Evie's life be ruined as well. She's young now, she's a baby and it may be fine right now. There's not a lot you can do to ruin her life or your mom can do to ruin her life. But, I believe this pattern of dysfunction you have in your life and this pattern of dysfunction your parents have in their life, it's really rare to see a family with the history.

Tara: I have a bunch of videos. I have a bunch of... I have stuff you haven't seen yet. I do not think you want to pursue this civil court thing Steve. I really don't want to go this route. You should not be taking this route. You need to be reasonable. Like I'm sorry...

Steve: I hear you that you're threatening me and you say you've got things that are embarrassing to me.

Tara: No, Steve. I'm telling you because I don't want to go there. I don't want to be at war with you.

Steve: Then, come to California through March. Stay at one of our two homes. Let my mom and my brother and my family see Evie. If you want to not go down this route come to one of our two homes through March. Do that.

Tara: Why can you not come to New York and see your daughter?

Steve: I did come to New York. I was in New York for two months and I saw Evie for three hours. I did it. I have a life, I have a job, we have two homes here, you're in your parent's attic because you don't have a place. It is reasonable. In your own proposed settlement you come out here every month and whatever for a longer period once per year or something. So, you can come out through March, it's not that long.

Tara: I have a job now where I need to be meeting with the company once per week. I couldn't even if I wanted to. What?

Steve: I get you're using that as an excuse because you're not making any money off that.

Tara: Yes I am.

Steve: You didn't put that in your proposal. Really how much money are you making for that job?

Tara: I don't want to talk about it Steve.

Steve: Yes it's not very much. You can put it in your proposal. Look I understand this is not getting anywhere. I hear it, what I hear from you is you're going to agitate more, make more threats you're going to put out you're going to be hurtful in public.

Tara: No, I did not.

Steve: You can't win legally so you're just going to basically try to embarrass me. I get it. I hear you're a bad person, Tara. You're a bad person.

Tara: That's not what I'm saying Steve.

Steve: What you're doing is wrong. If you're a good person you wouldn't lie.

Tara: I haven't lied, Steve. I haven't lied, I really haven't. I haven't

Steve: Okay, well we're going to give your lawyer a proposal. It's going to get worse every week going forward and especially based on this conversation I realize there's no hope for settlement with you.

Tara: I thought that you and I were going to have conversations and try and be amicable as parents face time with Evie, send you pictures also come up with...

Steve: Tara, look, you should be sending me pictures and face timing with Evie. The fact that you used Evie as you hold her hostage is cruel and it's wrong. You do cruel and wrong things. You think its okay, you don't have a moral sense of right and wrong.

Tara: That's not true Steve.

Steve: Well, you should be showing pictures of Evie and doing face time and not making it a condition of a settlement.

Tara: I'm not making it a condition of settlement, I'm not at all. What are you saying? I'm having this conversation with you because it's not in Evie's best interest for her parents to be at war with each. It takes energy out of me. It takes energy out of you to ask me...

Steve: It's not in Evie's best interest to live in grandma's and grandpa's attic.

Tara: She's doing very, very well here. I'm very happy. We're on a schedule.

Steve: I don't know anything about it Tara. I don't believe you because you're a liar. I don't know anything about anything. I don't have any proof. I don't know that you don't take her out of the house. I don't know what you do. I don't know that she's healthy. I don't know any of these things. I don't know that your mom is not giving her drugs. There's literally nothing I know about it because you are who you are.

Tara: So ask me any question that you want. Like...

Steve: I don't trust your answers. Tara, if you were out of that house, if you came out to San Francisco and you stayed for an extended period of time I would trust your answers. Right now you are held hostage by your parents. You're passing it on holding my daughter hostage. For some reason you absolutely, positively can't leave New York and that does not sound normal. It's very weird that you take that posture. We have two homes in California.

Tara: Okay. This like I'm getting like the sick feeling in my stomach that I've always had before and I don't like feeling this way. I'm just trying to like get through everyday and...

Steve: I'm going to let you go. I don't think you're mentally capable of having settlement conversation.

Tara: That's not true, Steve.

Steve: Tara, like your mental illness prevents you from thinking about any of this and you just said it yourself. You get agitated and you get this feeling in your stomach and you're not able to do anything that's adult or thoughtful and that's what you're doing.

Tara: Because you're yelling at me and saying horrible things about me.

Steve: I'm not yelling at you. I'm proposing a settlement where you will stay at one of our two houses through March and you'd get a big chunk of cash and have a nanny and you're telling me BS stuff like you could never come to California and you have a BS job that you won't tell me how much you make because you have to be there for it. Those are lies. They're like imaginations. You could absolutely come out. You've taken Evie away from not just me but her family in San Francisco. Your family that we basically been with never came and visit us in San Francisco once. I've seen your parent literally one time, other than when Evie was born. It is absurd. You lived with me and my mother for an extended period of time and my mom haven't got to see Evie at all. My brother who has a baby the same age basically, they'd be best friends and they're not hanging out, they're not together because of what you did. It's just wrong. Then you say you're agitated and so you can't talk about it. We're in court battles right now and somebody if you can't, if you don't have the mental ability to talk through this stuff you got to give somebody in your life your father or your lawyer the ability to I don't know talk this through.

Tara: I would like to be able to have another conversation with you but I'm just really, really tired.

Steve: This is the fourth night where we talk. It had to be 8:30 p.m. and the conversation didn't result in anything and you talked about how tired you were. I didn't see Evie at any of those conversations, nothing happened. So, this is what you make my life. It's the fourth time trying to call you and it's nothing. I'll try again tomorrow. I've instructed my lawyers to give you guys a settlement but I want you to understand it's the last time you're going to get this settlement offer, okay? I can't keep doing this and it's crazy to me, it's crazy to me that you keep this going.

Tara: Okay, Steve.

Steve: Get some rest.

Tara: Okay.

EXHIBIT "E"

EXHIBIT "F"

tax prep at
KAMINSKIA



Employee Reference Copy
W-2 Wages and Tax
Statement **2015**

Employer's Federal Identification No. 728-1234567
0000 817890 1234 5678901234

PRISM BICYCLES, INC
700 MARKET STREET 8TH FLOOR
SAN FRANCISCO, CA 94103

Batch #01234

Employee's name, address, and ZIP code
STEPHEN RUSSELL
13 VERMONT ST #2
SAN FRANCISCO, CA 94107

2015 W-2 and EARNINGS SUMMARY

This blue Earnings Summary section is included with your W-2 to help describe portions in more detail. The reverse side includes general information that you may also find helpful.

To file a federal income tax return you should file this and all other returns submitted by your employer.



EMPLOYER'S FEDERAL IDENTIFICATION NUMBER: 728-1234567

Wages, tips, other compensation	Social Security wages	Medicare wages	CA State Wages, tips, and commissions
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



3. Employee W-4 Profile: To change your Employee W-4 Profile information, file a new W-4 with your payroll or



© 2015 IRS

freemove
freemove
freemove
Employee Reference Copy
W-2 Wage and Tax Statement **2015**
OMB No. 1545-0047

Control Number	Regt.	Corp.	Emp. type use only
0010 R1/99Y			A 46

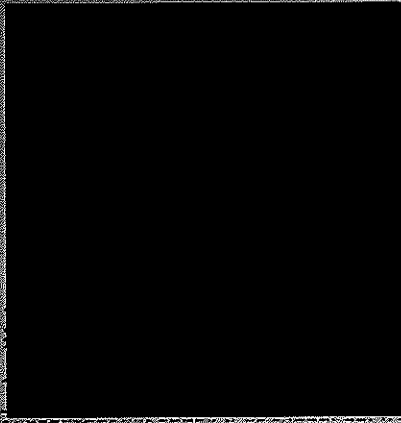
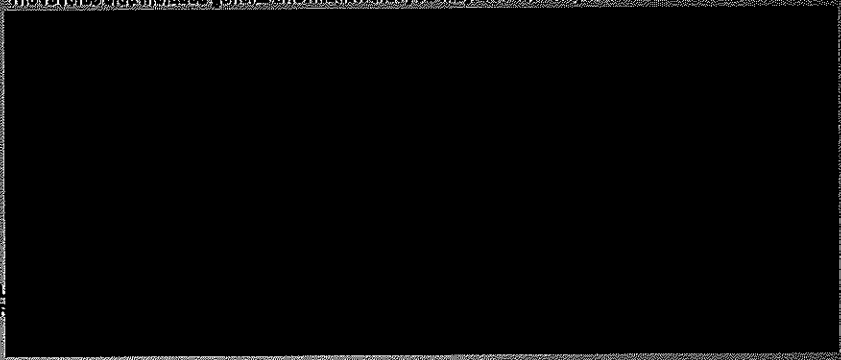
Employer's name, address, and ZIP code
RUBIN SKYLABS INC
799 MARKET STREET 8TH FLOOR
SAN FRANCISCO, CA 94103

Batch #01244

Employee's name, address, and ZIP code
YERHEN RUSSELL
13 VERMONT ST #2
SAN FRANCISCO, CA 94107

2015 W-2 and EARNINGS SUMMARY **AD**

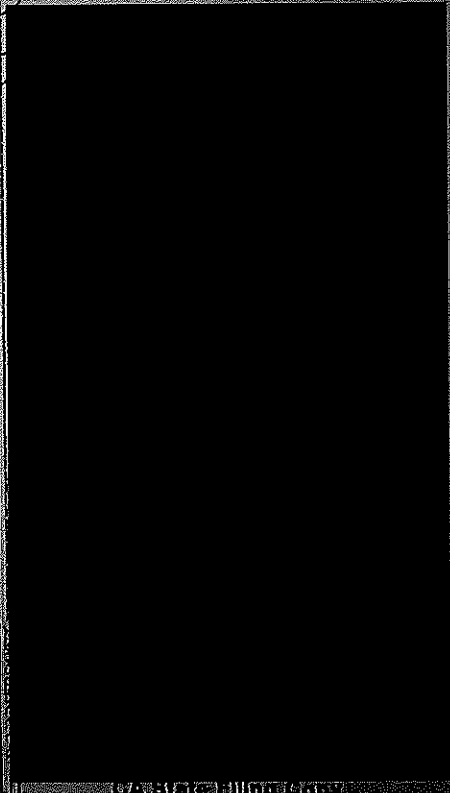
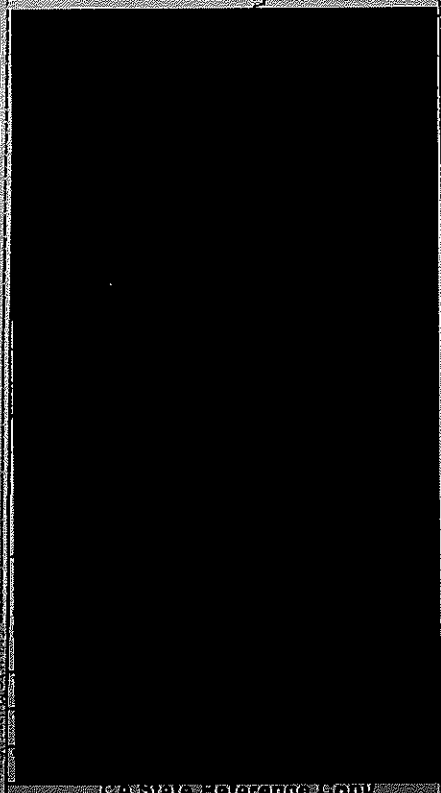
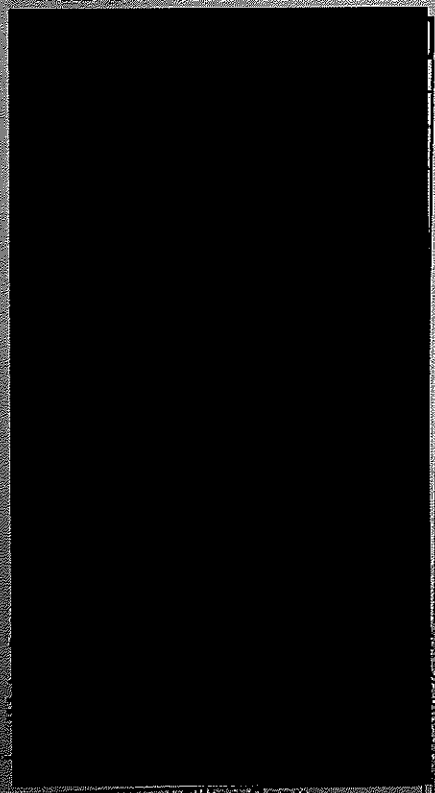
This blue Earnings Summary section is included with your W-2 to help describe portions in red and The reverse side includes general information that you may also find helpful.



3. Employee W-4 Profile. To change your Employee W-4 Profile information, file a new W-4 with your payroll.



D 2018 AOP, LLC



Federal Filing Copy
W-2 Wage and Tax Statement **2015**

CA State Reference Copy
W-2 Wage and Tax Statement **2015**

CA State Filing Copy
W-2 Wage and Tax Statement **2015**

October 19, 2016

**VIA OVERNIGHT COURIER/
RETURN RECEIPT REQUESTED**

Stephen Russell

[REDACTED]
San Francisco, CA 94107

Re: 3VR Security, Inc. – Common Stock Certificates

Dear Mr. Russell:

Enclosed please find the following stock certificates of 3VR Security, Inc. issued pursuant to your warrant exercises:


Name	No.	Shares
Stephen Russell	[REDACTED]	[REDACTED] Shares of Common Stock
Stephen Russell	[REDACTED]	[REDACTED] Shares of Common Stock

Please acknowledge receipt of the stock certificates by signing the enclosed securities receipt. Please PDF or fax the signed receipt back to me at lhart@wsgr.com or (650) 493-6811.

If you have any questions regarding the above, please do not hesitate to contact me directly at (650) 461-6204.

Sincerely,

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation


Laura Hart
Corporate Paralegal

Enclosures



GUNDERSON DETTMER

TO: Stephen Russell
 Prism Skylabs, Inc.
 [Redacted]
 San Francisco, CA 94103

FROM: [Redacted] Corporate Paralegal

DATE: July 7, 2016

RE: Bot Home Automation, Inc. - Preferred Series C Stock Certificates

ENCLOSURE MEMORANDUM

Enclosed please find the following stock certificate:

<u>Stockholder</u>	<u>Cert No</u>	<u>SharesNo</u>
Prism Skylabs, Inc.	[Redacted]	[Redacted]

Please acknowledge receipt of the certificate by signing the copy of this memorandum also enclosed and returning it in the envelope provided.

Should you have any questions, please do not hesitate to contact me at (415) 801-4870 or mburke@gunder.com.

Acknowledgement of Receipt

By: _____
 Name: _____
 Title: _____

INCORPORATED UNDER THE LAWS OF THE STATE OF CALIFORNIA
September 23, 2002

NUMBER

SHARES

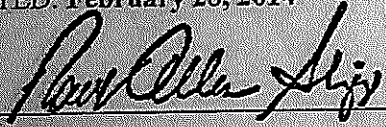
3VR SECURITY, INC.
Common Stock

THIS CERTIFIES THAT **Stephen Russell** is the registered holder of [REDACTED] Shares of the Common Stock of 3VR Security, Inc., hereinafter designated the "Corporation," transferable on the share register of the Corporation upon surrender of this certificate properly endorsed or assigned. This certificate and the shares represented thereby shall be held subject to all of the provisions of the Articles of Incorporation and the Bylaws of the Corporation, a copy of each of which is on file at the principal office of the Corporation, and made a part hereof as fully as though the provisions of said Articles of Incorporation and Bylaws were imprinted in full on this certificate, to all of which the holder of this certificate, by acceptance hereof, assents and agrees to be bound.

Any shareholder may obtain from the principal office of the Corporation, upon request and without charge, a statement of the number of shares constituting each class or series of stock and the designation thereof; and a copy of the rights, preferences, privileges and restrictions granted to or imposed upon the respective classes or series of stock and upon the holders thereof by said Articles of Incorporation and Bylaws.

WITNESS THE SEAL OF THE CORPORATION AND THE SIGNATURE OF ITS DULY AUTHORIZED OFFICERS.

DATED: February 28, 2014


Secretary,
Robert Allen Shipp


Chief Executive Officer,
Robert Allen Shipp

FORWARD PURCHASE AND SALE OF SECURITIES AGREEMENT

This Forward Purchase and Sale of Securities Agreement ("Agreement") dated as of April 1, 2014 for reference purposes is made between Steve Russell, an individual ("Seller"), and Tacit Capital, LP, a California limited partnership ("Purchaser") with reference to the following facts.

Recitals

A. As of the date of this Agreement set forth above, Seller is the beneficial owner and record holder of [REDACTED] of common stock of [REDACTED] (the "Company").

[REDACTED]

[REDACTED]

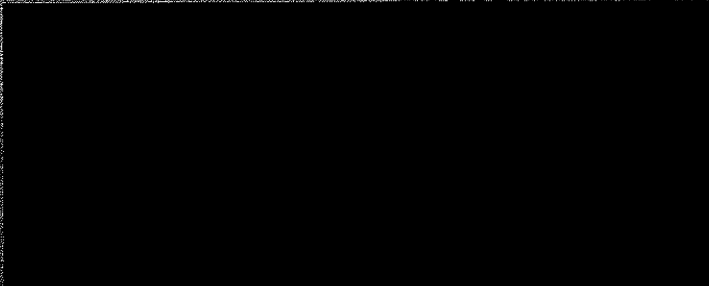
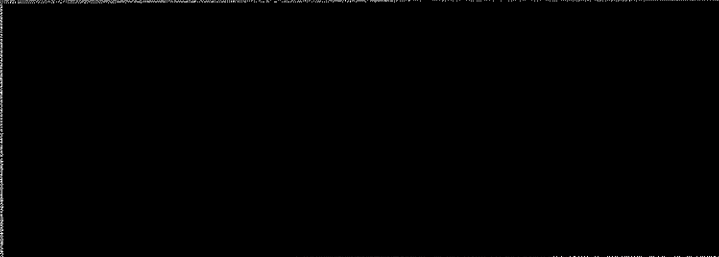
[REDACTED]

[REDACTED]

By signing below, we acknowledge our agreement with each of the statements contained in this Purchaser Investment Representation Statement as of the date hereof, and our intent for the Statement Recipients to rely on such statements in selling the Shares to the Purchaser.

PURCHASER: Tacit Capital, LP

Address: 100 Pine Street, Suite 2700
San Francisco, CA 94111



Capital

COMMON STOCK PURCHASE AGREEMENT

This Common Stock Purchase Agreement (this "*Agreement*") is entered into as of March 2014 between Stephen Russell (the "*Seller*") and Liberty Trust Company, Ltd, Custodian FBO DAVID D. SACKS ROTH IRA (the "*Buyer*").

RECITALS:



EXHIBIT "G"

Yeah my sister freaked out and didn't talk to me for a bit- and told the Peditrician I was mentally unstable and Steve was- it was awful

Collette to Tara Walsh:

Ugh - is all ok with Steve or at least getting a little better

Tara Walsh to Collette:

Yeah it's fine- just bad luck. Yes much better with Steve he's really stepped up- but still need to stay off adderall.

2/18/2018

9:12 PM

Tara Walsh to **Rashmi Narendra:**

It's hard to talk bc night nurse is here I'm going to bed soon- ru ok? Steve is threatening to not give me money for the night nurse and to support me bc I don't want to live to sf yet I fucking hate him right now To move to sf immediately Like blackmailing me is going to make me hop right on a plane [...] I think his mom is encouraging it I might have no choice but to go bc I really need his financial help I'm down like two clients and the baby is a lot of work during the day And then it will probably blow up and it can be his idea I need to come back here He can be such a jerk- I told him I have zero trust for him anymore

Rashmi Narendra to Tara Walsh:

what does your folks says ..

Tara Walsh to Rashmi Narendra:

They will say no way go back there! Duh

2/20/2018

3:23 PM

Tara Walsh to **Matan Gavish:**

Steve is trying to blackmail me to move to sf- been such a wonderful experience...No it kind of is bc baby is a lot of work and not sure how I can build or keep business- and he's taken back his offer to support me here- only if I am there. To be a "family" or else

Matan Gavish to Tara Walsh:

Lawyer Up

Tara Walsh to Matan Gavish:

Well he is going to buy a \$2.3 million dollar apartment in sf and put it in a trust under Evie's name I can also control So his mom said to just come there for a few weeks then can always sell it and say [Fuck You]

Matan Gavish to Tara Walsh:

Trusts can be altered

WALSH_004106

Tara Walsh to Matan Gavish:

In what way?

Matan Gavish to Tara Walsh:

You are losing to him already You are being strung along and manipulated

Tara Walsh to Matan Gavish:

Yeah well he's pushing me into a corner- my dad said having the baby was my idea and my problem. So I have to do whatever to survive If I sue him for child support I will get like \$2k a month Which is not enough to live off of I'm better pretending I want to be with him and getting the most while I can- then leaving him for good.

Matan Gavish to Tara Walsh:

Okay, have a fun 40 years

Tara Walsh to Matan Gavish:

More like 6 months...I think he will also marry me if I submit to him then I can just divorce him I really mostly hate him at this point- not sure I can manage to hold myself back. But would be the sweetest revenge if I could

2/21/2018

3:20 PM

Tara Walsh to Matan Gavish:

I think I can stay here and figure out a way to make it work I think there's a risk of me exploding at some point if I go to sf and casing physical harm to steve- which means the baby could be taken from me. Not risk almost a guarantee

3/1/2018

6:36 PM

Tara Walsh to Rashmi Narendra:

Want to fly on a private jet back with me to sf on Saturday for the night?? I need help bringing the baby and the dogs and my help fell through 😞 I can probably find someone else just thought it would be fun! Long story with me going back...it's been tough on my own.

3/2/2018

5:10 PM

Tara Walsh to Matan Gavish:

Maybe you can kidnap me and Evie so we don't have to leave I really don't want to I just can't do it on my own