

1 TARA WALSH  
SELF REPRESENTED PARTY  
2 *Tarawalsh0127@gmail.com*  
394 Whippoorwill RD  
3 Chappaqua, NY 10514

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5 Defendant in Pro Per

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

10 STEPHEN RUSSELL, an individual,

11 Plaintiff,

12 v.

13 TARA WALSH

14 Defendant

Case No. CGC-18-570137

**RESPONSE TO MOTION FOR  
JUDGEMENT SUMMARY**

Department: 302  
Date: October 27, 2021  
Time: TBD

Action Filed: September 26, 2018  
Trial Date: October 8, 2021

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20 **DECLARATION OF TARA WALSH**

21 I, TARA WALSH, am the named defendant in the above referenced matter. I have personal  
22 knowledge of each fact stated in this declaration.

23 1. RUSSELL was my former romantic partner. I met RUSSELL in New York where  
24 I live and have lived permanently. RUSSELL is the father of our daughter, Evie (Evelyn) who is  
25 3 years old. We were never married. Throughout the course of my relationship with RUSSELL,  
26 he abused me and I tried to leave many, many times. This includes physically assaulting me to the  
27 point I could not walk weeks after having a c-section. The things RUSSELL has done to me are  
28 unthinkable and deeply traumatic, but what I want more than anything is to move on with my life

1 and cut all contact with him. I have been in domestic violence counseling and support groups for  
2 close to three years attempting to heal. Even my family and friends have also been traumatized as  
3 bystanders witnessing each moment of horror unfold. Since I left RUSSELL in June of 2018,  
4 although I have had an almost constant order of protection against him, he has still found ways to  
5 indirectly terrorize me on a daily basis despite the fact he has elected to not see our daughter in  
6 over two years.

7         2.         RUSSELL is very wealthy, currently unemployed and has weaponized the civil  
8 court system here and in New York to exert control over me - as he did throughout our  
9 relationship - and to harass, intimidate, stalk and threaten me and my family. In addition to myself,  
10 my friend and family, Russell has evoked his intimidation tactics over judges, evaluators and  
11 lawyers within the court system in New York. .RUSSELL also filed another lawsuit in this court  
12 against my mother, father and I, which is totally fabricated and nothing but more harassment.

13         3.         I did not initiate any lawsuit against RUSSELL in San Francisco. I have never  
14 initiated any legal action whatsoever that was not a defensive response to his highly litigious and  
15 malicious nature. My cross-complaint before this court was only filed so that a lawyer, who was a  
16 friend of my then family attorney, could help me with a defense on contingency. However, the  
17 case quickly grew into something much larger than he could handle in conjunction with opening  
18 his own firm. At one point, RUSSELL had a team of lawyers pumping 1,000 of pages of endless  
19 and pointless documents into the courts. When my lawyer resigned, I wanted to do whatever I  
20 could to keep litigation to an absolute minimum. I was very transparent for months I wanted to  
21 drop my cross complaint before Judge Paul Rene sanctioned the dismissal in October 7, 2020. At  
22 the time, I had at least 5 other court proceedings initiated and pending in both civil, family and  
23 appellate courts in New York and San Francisco by RUSSELL. I was (and am) totally  
24 overwhelmed representing myself in all actions where court attorneys were not provided.

25         4. In this proceeding, in being Pro Se, I did not initiate a single motion or request any  
26 discovery from RUSSELL. The two things I tried to do were to file a motion to dismiss Russell's  
27 complaint and to dismiss my cross-complaint. Other than that, I have just responded to my best  
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1 and tried to make the court understand the nature of what is before them. I have not done anything  
2 to drive RUSSELL's litigation costs other than to defend myself.

3 5. Russell is not in anyway harmed or "injured" by me. His pending complaint is his last  
4 venue before a court that has not been rejected or dismissed. This is his last shot to do damage to  
5 me. Russell is a means of endless wealth- and I just get by as a single mother working full-time. I  
6 can say from the bottom of my heart every last penny of the \$55,724.77 RUSSELL requests are  
7 costs he willingly incurred for his own benefit. Almost all the depositions he took were after my  
8 cross-complaint was procedurally and CLEARLY dropped. The depositions included almost no  
9 relevant questions to the time periods of both complaints, but rather were an inquest into throwing  
10 punches and extracting personal information from innocent bystanders. This included taking 6  
11 hours of time from my little brother who is a full-time paramedic and medical student. My brother  
12 barely knows RUSSELL, lives in New York and literally spends his days saving the lives of  
13 others. It was horrifying to watch RUSSELL's lawyer execute the depositions in such a manor,  
14 which is perhaps why she quit following from shame or guilt.

15 6. I plead with this court not to award any of the requested fees to RUSSELL. He knows  
16 that all of my time, energy and money goes towards raising our daughter, in which \$55,000 goes a  
17 very long way.

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

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22 Signed this 7<sup>th</sup> of October, 2021, in Chappaqua, New York.

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By:   
TARA WALSH