

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 STEPHEN WALSH**

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

23 1. I never gave any deposition, nor agreed to any deposition, on October 21, 2021. I only
24 gave a deposition when forced to do so in an order from New York State courts. I also know that
25 my wife, Maura Walsh, and son, Brendan Walsh, did not give any depositions on October 22,
26 2020 and never agreed to do so. We all live together and were extremely disturbed and confused
27 as to why we would need to participate in depositions.

28 2. I gave a deposition on April 26, 2021 that was moderated by Joy Llaguna. The

1 deposition lasted six hours and was a series of questions that were not relevant to any actions
2 witnessed in California for the period of 2017 to 2018. My wife and son also gave depositions at
3 the end of April 2021. They also were highly upset and felt harassed as to the nature of
4 questioning in the depositions. I, nor anyone in our family, was present for any relations between
5 my daughter, Tara Walsh, and Stephen Russell in California. All of us have met Mr. Russell a
6 handful of times in New York for brief periods following the birth of my granddaughter. The
7 deposition's of all of our family were very harassing in nature and appeared to only be an inquest
8 to extract information for Mr. Russell to use in family court.

9 3. Following the depositions, Mr. Russell posted the full videos of our depositions on his
10 various websites and on Vimeo. The videos included highly defamatory commentary from Mr.
11 Russell. I am extremely disturbed by Mr. Russell's behavior and consider him to be a highly
12 dangerous individual. I do not think there is any merit to any of his accusations against my
13 daughter, Tara, and continued to be concerned for her safety.

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

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18 Signed this 7th of October, 2021, in Chappaqua, New York.

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By: _____

STEPHEN WALSH

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