LAUREN NEIDIGH
[redacted]

LAUREN NEIDIGH, IN PRO PER

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

LAURA OWENS **Petitioner,** **And** **MICHAEL MARRACCINI** **Respondent.**	**Case No.: FDV-18-813693** **OMNIBUS MOTION TO STRIKE IRRELEVANT, FALSE, AND SCANDALOUS FILINGS BY DAVID S. GINGRAS; IN THE ALTERNATIVE, MOTION TO SEAL OR REDACT NON-PARTY REFERENCES (FILED BY INTERESTED NON-PARTY LAUREN NEIDIGH, MOVANT)**

NOTICE OF MOTION

PLEASE TAKE NOTICE that on a date to be set by the Court, or as soon thereafter as the matter may be heard in Department 405A, Movant LAUREN NEIDIGH, a non-party to this action, will and hereby does move the Court under **Code of Civil Procedure § 128(a)(3)** and the Court's **inherent and equitable authority** for an order striking in its entirety the filings submitted by David S. Gingras, or in the alternative, ordering redaction or sealing of references to Movant.

1. Motion to Intervene, for Sanctions, and Disciplinary Referral; and

2. Reply in Support of Motion to Intervene, for Sanctions, and Disciplinary Referral (collectively, the "Gingras Filings").

In the alternative, should the Court decline to strike the filings in full, Movant moves under Cal. Rules of Court 2.550–2.551 to seal or redact all portions identifying or discussing Movant.

This Motion is based on this Notice, the accompanying Memorandum of Points and Authorities, the records and pleadings on file in this action, and any further evidence or argument presented at hearing.

MEMORANDUM OF POINTS AND AUTHORITIES

I. Procedural Posture

The Gingras Filings are set for hearing on October 10, 2025, for which the Court has issued a tentative ruling denying those motions. Regardless of the Court's ultimate ruling, the challenged documents are improper in their entirety. They are replete with irrelevant, false, and scandalous statements about Movant (a non-party) and serve no legitimate purpose. The Court's tentative denial reinforces that these filings are a misuse of the judicial process.

II. Background

1. Movant is a healthcare professional and private citizen who produces commentary content on YouTube addressing legal and social issues.

2. Movant is acquainted with attorney Omar Serrato, counsel for Respondent, but their friendship is personal and unrelated to this case. They have not substantively discussed the filings, facts, or strategy of this action since Mr. Serrato became professionally involved.

3. Movant and Mr. Serrato have participated in public YouTube commentary concerning a different matter involving Petitioner Owens. Those discussions were public, journalistic, and

unrelated to this proceeding.

4. Movant follows several independent, public social-media pages collectively known as "Justice for Clayton," which discuss matters of public interest concerning Ms. Owens, her forthcoming criminal trial, and her various quests in civil court. Movant has no administrative, managerial, or participatory role in any of these pages and is not affiliated with those who operate them. These pages are independent discussion forums, not a coordinated group or "cult," as Mr. Gingras falsely claims.

5. Movant acknowledges that, as a YouTube commentator who discusses legal topics of public interest, she may be a limited-purpose public figure within that narrow context. However, that status does not permit attorneys to weaponize judicial filings to harass, defame, or intimidate.

6. The Gingras Filings falsely accuse Movant of criminal conduct, "harassment," and being a "key cult leader," and insinuate she engages in coordinated misconduct, all without evidence or connection to any issue rooted in reality or before this Court.

7. Movant has never had any contact with Ms. Owens and had only one brief, cordial conversation with Mr. Gingras, after which she expressly declined further contact. Instead, Mr. Gingras and Ms. Owens deliberately and continually seek out and monitor a semi-public Discord discussion server in which Movant participates, reviewing her conversations and selectively quoting them to portray her negatively in their litigation filings.

8. Mr. Gingras and Ms. Owens also routinely monitor Movant's public YouTube commentary, even though they are under no obligation to do so. They voluntarily expose themselves to speech they dislike, then claim to be harassed by it. Their continued engagement with Movant's online commentary, coupled with their refusal to disengage, undermines any suggestion that they are victims of harassment. At best, their alleged "distress" is self-inflicted outrage, not actionable conduct by Movant.

9. These accusations are false, irrelevant, and scandalous. Their only apparent purpose is to

punish Movant for exercising her constitutional right to free speech and to publicly vilify her through misuse of the Court's docket.

10. The filings are therefore not legitimate pleadings but an intentional abuse of legal process, designed to harm and intimidate a private citizen under color of judicial authority.

III. ARGUMENT

A. The Court Has Inherent and Equitable Authority to Strike Improper or Abusive Filings

This Court's power to strike the Gingras Filings arises from its inherent authority under § 128(a)(3) to provide for the orderly conduct of proceedings and to amend and control its process and orders so as to make them conform to law and justice.

California courts recognize that this authority includes the power to strike or disregard improper papers and to prevent abuse of judicial process. In addition, the Court possesses equitable power to protect nonparties and interested persons from misuse of its docket. When filings are submitted for the purpose of harassment, defamation, or intimidation rather than legitimate litigation, the Court may strike them in whole or in part, or otherwise order their removal or sealing.

Here, the Gingras Filings serve no legitimate procedural or substantive purpose. They are vehicles for personal attacks and retaliation against a non-party who engaged in protected speech. Exercising its inherent and equitable powers, the Court should strike those papers in their entirety to preserve the integrity of the proceedings and protect Movant from further abuse.

B. The Gingras Filings Are an Intentional Abuse of Legal Process

The Gingras Filings misuse this Court's authority by turning it into a platform for retaliation against a non-party critic. They contain false and inflammatory claims, including that Movant

"harassed" Mr. Gingras and Ms. Owens even though Movant has never had any contact with Ms. Owens and had only one brief, cordial conversation with Mr. Gingras, after which she repeatedly declined further contact.

In truth, it is Mr. Gingras and Ms. Owens who have repeatedly sought out Movant's online commentary, deliberately locating the Discord discussion server in which she participates and monitoring her YouTube content. Having chosen to observe and analyze Movant's constitutionally protected speech, they cannot credibly claim to be harassed by what they voluntarily consume. Their filings weaponize that self-selected content as part of a campaign of retaliatory abuse of legal process aimed at silencing criticism.

C. Movant's Limited-Purpose Public Figure Status Does Not Excuse Retaliation

Movant's public commentary on legal and social issues does not grant others authority to defame or intimidate her through official filings. Even limited-purpose public figures remain protected from retaliation and abuse of process. The First Amendment and Article I, § 2(a) of the California Constitution protect both the right to criticize and the right to be free from punitive misuse of the courts for doing so.

D. The Court's Tentative Denial Confirms the Filings' Lack of Relevance

The Court's tentative denial of Mr. Gingras's motions demonstrates that his underlying filings lack substantive merit. The personal attacks against Movant are therefore doubly improper: they are irrelevant to the issues before the Court and serve only to perpetuate harm and harassment against a non-party critic.

E. Alternative Relief—Sealing or Redaction Under Rules 2.550–2.551

If the Court declines to strike the Gingras Filings in full, Movant respectfully requests that

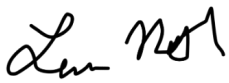
the Court order the sealing or redaction of all portions identifying or discussing her. As a non-party private citizen, Movant's privacy, safety, and protection from retaliation constitute overriding interests under Rule 2.550(d). The proposed redactions would be narrowly tailored to prevent ongoing harm while preserving public access to legitimate court business.

IV. Relief Requested

Movant respectfully requests that the Court:

1. Strike in its entirety the following filings by David S. Gingras under the Court's inherent authority (CCP § 128(a)(3)) and equitable powers as irrelevant, false, scandalous, and abusive: (a) Motion to Intervene, for Sanctions, and Disciplinary Referral; and (b) Reply in Support of Motion to Intervene, for Sanctions, and Disciplinary Referral.
2. In the alternative, strike or redact all portions of those filings that reference or discuss Movant.
3. Alternatively, if striking is denied, seal or redact those filings pursuant to California Rules of Court 2.550–2.551.
4. Grant such other and further relief as the Court deems just and proper to protect Movant and the integrity of these proceedings from continued abuse of process.

DATED: October 10, 2025



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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

LAURA OWENS **Petitioner,** **And** **MICHAEL MARRACCINI** **Respondent.**	**Case No.: FDV-18-813693** **DECLARATION OF LAUREN NEIDIGH IN SUPPORT OF OMNIBUS MOTION TO STRIKE FILINGS BY DAVID S. GINGRAS**

I, Lauren Neidigh, declare as follows:

1. I am the Movant and an interested non-party in this matter. I make this declaration in support of my Omnibus Motion to Strike Irrelevant, False, and Scandalous Filings by David S. Gingras, or in the Alternative, Motion to Seal or Redact Non-Party References. I have personal knowledge of the facts stated herein, and if called to testify, I could and would competently testify to them.

2. I am a healthcare worker and a YouTube content creator who produces commentary on legal and social issues. My commentary occasionally involves public cases, but I am not, nor have I ever been, a party, witness, or participant in this case.

3. I have never had any contact with Petitioner Laura Owens. I had one brief, polite interaction with Mr. Gingras a long time ago. That was the extent of our interaction. I later made clear that I did not wish to have further association or contact with him (a boundary that he apparently continues to struggle with).

4. Despite that, Mr. Gingras and Ms. Owens have gone out of their way to follow, monitor, and screenshot my online activity, including a public Discord forum and my YouTube commentary. These are public spaces, so I cannot stop them from watching, though one might expect Mr. Gingras, as a professional, to know when to look away from things that upset him. Ms. Owens continues to insist on listening to everything I have to say about her public proceedings, knowing that it will be unfavorable towards her. I am declining to censor myself due to Ms. Owens' lack of self-control or refusal to exercise it. I cannot stop Ms. Owens from her self-destruction any more than I can prevent Mr. Gingras from continuing to accuse me of being part of a "cult."

5. Mr. Gingras has now used my name, image, and commentary in multiple filings, asserting that I am a key leader of a "cult," that I "harassed" him, and that I have been engaged in conspiratorial and criminal behavior. These claims are entirely false. They also suggest a troubling amount of time spent trying to criminalize the free expression of the online opinions of a total stranger. I have never been arrested or credibly accused of a crime. While I interact with many others in my online commentary, this is what is commonly known as

"friendship." Mr. Gingras' idea of a cult does not appear to be in touch with reality. Additionally, I am a leader of no one. I have no interest in having people follow me around.

6. I have never harassed, contacted, or threatened either Mr. Gingras or Ms. Owens. The only ongoing "contact" is the kind they create by repeatedly seeking out my public content. To the extent anyone is providing unwanted attention here, it isn't me.

7. I follow several public social media pages known as "Justice for Clayton." There are multiple unaffiliated pages under that name. I have no involvement in running or moderating any of them, and none of them are a "cult." If they were, I assume we'd at least have matching T-shirts.

8. My inclusion in these filings serves no legitimate purpose. It appears designed to punish me for expressing opinions online (opinions that Mr. Gingras and Ms. Owens voluntarily consume, then claim to find distressing). Their filings weaponize their own voluntary outrage as evidence.

9. I am submitting this declaration not because I enjoy being dragged into litigation I have nothing to do with, but because I believe courts should not be used as a platform for personal vendettas against online critics. The statements made about me are false, irrelevant, and professionally reckless, and I ask that they be stricken or sealed.

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

DATED: October 9, 2025

LAUREN NEIDIGH
In Pro Per

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address)	TELEPHONE NUMBER	FOR COURT USE ONLY
Lauren Neidigh Self Represented	Ref. No. or File No:	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO - CENTRAL (EFILING) 400 McAllister St San Francisco, CA 94102		
SHORT TITLE OF CASE: Owens, Laura vs Michael Marraccini		
Proof of Electronic Service		CASE NUMBER: FDV-18-813693

1. I am at least 18 years old.

   a. My residence or business address is

   b. My electronic service address is

2. I electronically served the following documents:

#	Title
1	Declaration of
2	Motion (Generic)
3	Proof of Electronic Service

3. I electronically served the documents listed in 2 as follows:

#	Name	Email
1	Owens, Laura Pro Per	laura@lauramichelleowens.com
2	Gingras, David S	david@gingraslaw.com
3	Serrato, Omar	office@eaglelawfirm.org,tiltedlawyer@gmail.com

On: **10/09/2025** At: **05:29 PM**

Date: **10/09/2025**

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

Lauren Neidigh

► /S/ Lauren Neidigh