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6 Attorneys for Respondent, ALICE EVANS

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES**

10 In re the Marriage of :
11 IOAN GRUFFUDD,
12 Petitioner,
13 and
14 ALICE EVANS,
15 Respondent.

Case No.: 22STFL02019

**REPLY MEMORANDUM OF POINTS
AND AUTHORITIES, AND REPLY
DECLARATIONS OF RESPONDENT,
ALICE EVANS AND JANINA A.
VERANO, ESQ. (REDACTED)**

Hearing Date: October 8, 2024
Time: 8:30 a.m.
Dept.: 6

[Case Assigned to Hon. Josh Freeman Stinn,
Dept. 6]

**REPLY MEMORANDUM
OF POINTS AND
AUTHORITIES**

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I.

THE PETITIONER FAILS TO ADDRESS THE PROCEDURAL POSTURE OF THIS CASE WHEN THE RFO FOR A PROTECTIVE ORDER WAS FILED

Glaringly omitted from Petitioner’s legal argument is the fact that at the time Alice filed this RFO for a protective order, he had stated through his counsel that he intended to file a motion to seal the entirety of the Custody Stipulation, which would have been in direct violations of the terms thereof. Moreover, he had yet to file his responsive declaration to Alice’s RFO to seal only the two agreed upon provisions of the Stipulation. Petitioner was free to oppose Alice’s request to seal only the two agreed upon provisions of the Stipulation and request that the Court seal the entire Stipulation as he stated he would in a letter from his counsel to Alice’s counsel (*See Exhibit A*). All the alleged “evidence” contained in Petitioner’s attorney’s letter were posts made by Alice in 2021 and 2022, which have been addressed at length in this litigation and in the custody evaluation.

Despite his counsel’s threat to file a motion to seal the entire Custody Stipulation, ultimately the Petitioner decided to abide by his agreement and at the hearing on September 9, 2024, Petitioner expressed his agreement to seal only 2 provisions of the Stipulation, which came as a surprise to Respondent. As of the date of the filing of the RFO for a protective order (August 8, 2024) Alice had no way of knowing that the Petitioner would ultimately comply with his agreement to only seal the two agreed upon provisions of the Custody Stipulation.

II.

PETITIONER FAILS TO SHOW HOW THE REQUESTED PROTECTED ORDER WOULD PRECLUDE HIM FROM INQUIRING INTO THE UNRESOLVED ISSUES

Respondent’s RFO requests a protective order with the following parameters:

1. An order that Petitioner’s counsel be prohibited from inquiring into child custody and visitation issues that were resolved by the Stipulation and Order executed by the Parties on May 31, 2024 (hereinafter the “Stipulation”), including whether the Stipulation should be sealed and whether Alice abused the children and/or violated the DVRO by creating fake social media accounts as falsely alleged by Petitioner;
2. An order that Petitioner’s counsel be prohibited from inquiring into Alice’s communications with the “public third parties,” including the press;

1 C. Petitioner wants to have his cake and eat it too as it pertains to his argument that Alice is not
2 entitled to spousal support due to her alleged “ongoing abuse.”

3 The Petitioner contends that there is a valid and enforceable prenuptial agreement that
4 controls the spousal support issue in this case. The terms of that agreement state that the Family Code
5 does not apply to the spousal support provisions. As such Petitioner’s arguments pertaining to *Family*
6 *Code* Section 4320 (i), are a red herring. Additionally, all of the cases that hold that an abuser is not
7 entitled to receive spousal support include some type of physical violence, stalking, or molestation
8 of children none of which are evident here. [See *In re Marriage of Schu* (2016) 6 Cal.App.5th 470 –
9 holding that Wife providing alcohol and pornography to her teenage son in order to molest his friend
10 disqualified her from receiving spousal support upon release from prison; See also *In re Marriage of*
11 *Cauley* holding that Wife’s criminal conviction for domestic battery stemming from traveling to
12 Florida, destroying Husband’s personal property, and spraying Husband and his girlfriend with
13 herbicide in the face disqualified her from receiving spousal support] Lastly, there has been no
14 prejudice to the Petitioner due to the delay of Alice’s deposition as he falsely alleges in his responsive
15 declaration. At the hearing on September 9, 2024, the parties stipulated to interim support figures
16 based upon the parties Income and Expense Declarations, the Court set this matter for a one-day
17 evidentiary hearing on February 13, 2024, and retained jurisdiction to modify the agreed upon child
18 and spousal support orders retroactively. As such, Petitioner is free to make any arguments he would
19 like at the February 13, 2024 hearing.

20 D. All motions for protective orders filed before a deposition that seek to limit any area of inquiry
21 is based upon speculation.

22 California *Code of Civil Procedure* Section 2025.420(a) states that any party or deponent
23 may bring a motion for a protective order *before*, during, or after a deposition. California *Code of*
24 *Civil Procedure* Section 2025.420(b) provides examples of some instructions that may be included
25 in such a protective order. Included in the list is “that certain matters not be inquired into” and “the
26 scope of the examination be limited to certain matters.” As such, all motions for protective orders
27 that seek instructions from the court to limit the scope of the examination and/or that certain matters
28 may not be inquired into must contain some degree of speculation. Based upon the document demand
attached to the deposition notice, it was clear that Petitioner seeks to question Alice about the
messages and text messages from 2021 and 2022 that have been addressed by the custody evaluator
and the police.

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2 **III.**
3 **DISCOVERY SANCTIONS AGAINST PETITIONER ARE WARRANTED BECAUSE**
4 **PETITIONER’S COUNSEL FAILED TO SUBSTANTIVELY RESPOND TO**
5 **RESPONDENT’S COUNSEL’S MEET AND CONFER EFFORTS**

6 As set forth in Respondent’s moving papers, Petitioner’s counsel inexplicably waited 3 weeks
7 to respond to Respondent’s initial meet and confer efforts regarding Alice’s request for a protective
8 order. In fact, while Respondent’s counsel sent 4 meet and confer letters, Petitioner’s counsel only
9 sent one. After review of the one letter, Alice did withdraw one of her objections. Moreover,
10 Respondent’s counsel specifically told Petitioner’s counsel that the instant motion was being filed
11 out of an abundance of caution due to the proximity of the deposition and invited Petitioner’s counsel
12 to continue to meet and confer regarding the issues after the motion was filed to avoid the hearing.
13 Petitioner's counsel did not contact Respondent’s counsel regarding same until just one week ago.
14 Had Petitioner’s counsel timely met and conferred with Respondent’s counsel perhaps this entire
15 motion could have been avoided. For these reasons, the Court should impose discovery sanctions
16 against Petitioner pursuant to California *Code of Civil Procedure* Section 2017.020(b).

17 **IV.**
18 **CONCLUSION**

19 Respondent respectfully requests the Court grant her request for a protective order and order
20 Petitioner to pay discovery sanctions for his failure to meet and confer in good faith and for opposing
21 this motion without substantial justification.

22 Respectfully Submitted,

23 Dated: October 1, 2024

24 **CUNEO & VERANO, P.C.**

25 

26 JANINA A. VERANO, ESQ.
27 Attorneys for Respondent,
28 ALICE EVANS

**REPLY DECLARATION
OF RESPONDENT,
ALICE EVANS**

1 DECLARATION OF ALICE EVANS

2 I, ALICE EVANS, declare and state:

3 1. I have personal knowledge of the following facts and, if sworn as a witness, could and would
4 competently testify thereto under oath. I offer this Reply Declaration in lieu of my personal
5 testimony. I make this reply declaration in further support of my Request for Order for a Protective
6 Order and discovery sanctions. I reviewed Petitioner’s Responsive Declaration, and it contains
7 several false and misleading statements along with sweeping conclusions all based upon speculation.
8 This Reply Declaration addresses Petitioner’s false and misleading statements. I will file evidentiary
9 objections to strike the portions of Petitioner’s Responsive Declaration that contains argumentative
statements, speculative conclusions and legal analysis

10 2. Ioan falsely states that he did not renege on the terms of our custody stipulation executed. On
11 May 1, 2024 (see Pet. Decl. P. 1, lns 15-25). A big point of contention during the negotiations of the
12 custody stipulation was whether or not the entire stipulation or only certain provisions of the
13 stipulation would be sealed. Notwithstanding our agreement that only two provisions of the custody
14 stipulation should be sealed and Ioan’s attorney’s assurances that they would file the motion to seal
15 the two agreed upon provisions (which would have saved me thousands of dollars in attorney's fees),
16 on June 26, 2024, Ioan’s limited scope custody counsel, Azita Avedissian, sent my attorney a letter
demanding that I agree to seal the **entire** stipulation. The letter states the following

17 If Ioan is forced to file a motion to seal the entire stipulation, in support of his
18 request, he will have to provide the following information regarding the case
19 history... I ask that you review the below information and renew the request to
consider not opposing Ioan’s request to seal the entire Stipulation.

20 A copy of Ms. Avedissian’s letter dated June 26, 2024 is attached as Exhibit “A”.

21 3. I have not violated any Court orders. The Petitioner continues to reference alleged
22 “violations” of the DVRO that took place in 2021 and 2022. As stated in my prior declarations, I
23 apologize for the messages and social media posts that were sent in 2021 and 2022. I was acting out
24 of emotion after the very sudden end of our marriage, which was quickly followed by a public
25 Instagram post announcing Petitioner’s new relationship. While the messages I sent in 2021 and 2022
26 were inexcusable, I request the Court to consider the emotional trauma that I sustained during that
time.

27 4. The truth is that the Petitioner is violating the Court’s order not to make any derogatory
28 remarks about me either directly or indirectly to the minor children nor allow any third party to do

1 so. Attached hereto as Exhibit “B” is a social media post made by the Petitioner’s fiancée in late
2 March 2024. As set forth therein, Petitioner’s fiancée states that I am an abuser and uses the pronoun
3 “we” when she tells her followers that thousands of people have contacted her and Petitioner to
4 complain about my alleged “abuse.” Other than the Petitioner, his fiancée and the trolls online,
5 nobody in my professional or personal life has ever accused me of being abusive. On April 1, 2024,
6 my attorney wrote to Petitioner’s attorney and sent her a copy of the Instagram post. My attorney
7 stated in the letter that the Instagram posts were violations of the Court’s order not to make any
8 derogatory comments about the other parent directly or indirectly to the children and requested that
9 Petitioner request that his fiancée remove the posts. My attorney’s letter was ignored by Petitioner
10 and his attorney. The Custody Stipulation states that neither party shall make derogatory remarks
11 about the other parent and that they shall use their best efforts to ensure that their friends, family
12 members and significant others also refrain from making derogatory remarks about the other parent
(See Exh. “2” to Petitioner’s Declaration, section 6.e.) Notwithstanding this order, Petitioner’s
fiancée’s Instagram posts remain.

13 5. Petitioner’s allegations in Paragraph 6 of his responsive declaration related to the stories in
14 the Daily Mail are merely conclusions that do not cite any actual facts. He fails to mention which
15 specific articles allegedly disclose contents of the custody evaluation, because there are not any such
16 articles. I did not disclose the contents of our confidential custody evaluation, and I take offense to
17 the allegation. The Petitioner completely ignores the fact that the Daily Mail posts stories about this
18 proceeding after either of us files a declaration or a pleading. In short, it appears that the Daily Mail
19 gets their content primarily from the public record. I have many media acquaintances as does the
20 Petitioner, which is normal since we both have been in the entertainment industry for over 30 years.
21 One of my friends is Alison Boshoff, but the DVRO does not preclude me from having friends that
22 work in the media. I know for a fact that Ms. Boshoff only includes facts that are in the public record
23 in her stories. While Ms. Boshoff and I may have conversations off the record, those are private
24 conversations between friends, not statements to the media. The statements that I have made to Ms.
25 Boshoff that appear in the Daily Mail are already available to Petitioner.

26 6. In fact, I have also seen the Petitioner fraternizing with Andrea Burkart, an attorney who posts
27 to social media about our dissolution of marriage proceeding. Ms. Burkart has said awful things about
28 me in the press. For example, Ms. Burkart refers to me as “Malice” instead of “Alice” in her Twitter
posts. Also, in a post dated August 27, 2024, Ms. Burkart accuses me of lying about my financial
situation. Copies of Ms. Burkart’s posts referring to me as Malice and making disparaging comments

1 about me are attached hereto as Exhibit “C.” Ms. Burkart drove over 3,000 miles to attend the hearing
2 on September 9, 2024. While I was sitting in the courtroom, I received notifications from friends and
3 supporters that Ms. Burkart was posting to her Twitter account. Apparently, she was sitting right next
4 to me in the hallway giving a play-by-play of what I was doing before the hearing and stated that she
5 wanted to see me get onto Twitter. I no longer have a Twitter account, so I took her comment to
6 mean that she believes the Petitioner’s narrative that I have fake Twitter accounts that I use to post
7 on social media about these proceedings (which I do not.) At the beginning of the hearing, the Court
8 called our attorneys into chambers for a conference. While my attorney was in the chambers
9 conference, I received notice that Ms. Burkart was in the courtroom. I turned around and saw her and
10 the Petitioner engaged in conversation, smiling and laughing. This concerned me greatly as it appears
11 that the Petitioner is assisting Ms. Burkart to make disparaging statements about me in Ms.
12 Burkart’s social media. I got up to take a photo of Ms. Burkart, not of the Petitioner. The bailiff saw
13 me and asked me to delete the photo, which I did. ***I was not “kicked out” by the bailiff.*** I asked the
14 bailiff to go outside with me so I could explain what was going on. Ms. Burkart came out into the
15 hallway a few moments later. When I told the bailiff about Ms. Burkart’s Twitter posts, he asked
16 Ms. Burkart to refrain from using her phone in the courtroom. Based upon the remainder of her
17 Twitter posts from that day it is clear that she did not listen and continued to use her phone for the
18 remainder of the hearing. A copy of Ms. Burkart Twitter posts from September 9, 2024 are attached
19 as Exhibit “D”. As set forth therein, Ms. Burkart continued to give a play-by-play of the court
20 proceedings on Twitter after the bailiff asked her to cease using her phone.

21 7. In further corroboration of the facts pertaining to the photo I took of Ms. Burkart in the
22 courtroom on September 9, 2024, Ms. Burkart posted a You Tube video on the topic. In the video
23 she admits to using her phone in the courtroom after the bailiff asked her not to and states that I was
24 taking a photo of her, not the Petitioner.

25 8. The social media comments that I made in September 2024 (Petitioner's Exhibit “6”) are a
26 red herring as they pertain to this RFO for a protective order. As the Court is aware, in my moving
27 papers, I requested a protective order to preclude Petitioner’s attorney from questioning me about
28 issues that were resolved via the custody stipulation and my communications with the press (because
they are already public). Also, it appears that we have an agreement that Petitioner may only ask me
about issues that remain to be resolved: child support, spousal support, property division, validity of
the prenuptial agreement, and attorney’s fees including sanctions. I asked for this because based upon
his custody counsel’s comments in her June 24, 2024 letter (*See* Exhibit “A”), I believed that

1 Petitioner would request an order that the entire stipulation be sealed and that he sought to question
2 me about issues related to his request to seal the entire stipulation at the deposition, which was noticed
3 for August 15, 2024, well before our September 9, 2024 hearing date. When I did not get such
4 confirmation, I engaged in the appropriate procedure to obtain a protective order to preclude
5 Petitioner's counsel from asking me about facts related to the sealing. In short, if the Court grants
6 my request for a protective order, Petitioner will not be precluded from asking me about the social
7 media comments attached as Exhibit "6" to Petitioner's responsive declaration.

8 9. Moreover, the social media comments regarding the proceeding attached as Exhibit "6" are
9 general comments about my life, the dissolution proceedings, and court proceedings in general; they
10 were not intended to disturb the Petitioner's peace. The DVRO (Petitioner's Exhibit "4") specifically
11 states that the order does *not* prohibit me from commenting regarding this proceeding. The Instagram
12 post about the high cost of prescriptions for the children was also not intended to disturb the
13 Petitioner's peace and was merely commentary regarding the health insurance industry and the high
14 cost of health care in this country. I also commented on my true feelings that if I want the Petitioner
15 to contribute to the cost of the medical expenses for the children, I will need to incur attorney's fees
16 and costs, which makes the entire process more expensive. Due to the fact that I am receiving \$4,500
17 per month in combined temporary child and spousal support, I have custody of both children 100%
18 of the time, and our rent payment alone is \$6,500 per month, I cannot afford to communicate only
19 through lawyers. Petitioner's complaints show me that the Petitioner would like to silence me and
20 does not want me to comment about my life experience. Also, Petitioner's supporters often comment
21 with rants and are rude to me on social media. The comments I made on September 24, 2024 were
22 in response to such a Troll. Attached hereto as Exhibit "E" are the disparaging comments made by
23 Petitioner's supporter on my Instagram post.

24 10. It is glaringly evident that Petitioner is chasing the nuisance because he, his fiancée, and/or
25 their supporters appear to be trolling through my Instagram. Most of the alleged "posts" on social
26 media attached as Exhibit "6" to Petitioner's Responsive Declaration are comments that I made to
27 other people's social media posts; not posts on my Instagram profile itself. In order to obtain these
28 comments, the Petitioner, his fiancée, and/or their supporters must go onto my Instagram profile,
open profiles of people I follow and look for comments I made on their posts. This is in line with the
Petitioner's ongoing efforts to have me thrown in jail. Petitioner has made over 17 reports to the
police for alleged violations of the DVRO. The only charge brought against me was when I copied
Petitioner on an email to our car insurance company. Since he was the named on the insurance policy,

1 I wanted to ensure he knew about the claim. After learning the true facts, the charges were dropped.
2 In short, despite his best effort to try to have me prosecuted for violating the DVRO, the Petitioner
3 has not been successful because there have been no violations.

4 11. I am happy to sit for my deposition. I am not trying to dodge my deposition. I understand that
5 my deposition *and* the Petitioner's deposition are necessary steps to end this case. I filed this motion
6 for a protective order because I want to ensure that the process is fair, and that the Petitioner's
7 attorney only asks questions that are directly relevant to the remaining issues in this litigation. I also
8 wanted to ensure that we did not spend the entire deposition asking about my social media posts and
9 messages from 2021 and 2022, which Petitioner has been referencing and citing time and time again
10 as alleged violations of the DVRO. The police have found that they are not violations, and the custody
11 evaluator, [REDACTED]

12 12. While I employed the appropriate legal procedure to seek a protective order to ensure that my
13 deposition addressed only the remaining issues in this case and did not unduly invade my privacy,
14 the Petitioner has thumbed his nose at each and every single deposition notice that was properly
15 served upon him. In fact, when my current attorney noticed the Petitioner's deposition for May 20,
16 2024, the Petitioner's counsel wrote to my attorney 3 days before the deposition stating that he was
17 unable to go to the deposition because he was traveling internationally. The Petitioner had several
18 weeks' notice of the deposition and chose to be out of the country on the date set for his deposition.
19 As such, the Petitioner's allegations that I am dodging my deposition when I am simply utilizing the
20 correct legal process to ensure the deposition is fair, are more deflection on his part.

21 13. I respectfully request the Court to grant my request for a protective order.

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

24 Dated: October 1st, 2024



ALICE EVANS

EXHIBIT A

June 26, 2024

VIA EMAIL*cuncoverano@gmail.com**jveranolaw@gmail.com*

Janina A. Verano

Cuneo & Verano, P.C.

12100 Wilshire Boulevard, Suite 420

Los Angeles, CA 90025

Re: **Marriage of Gruffudd/Evans**

Dear Janina:

I am writing to ask you to discuss the contents of this letter with your client and to reconsider Ioan's request to agree to seal the entire Stipulation regarding custody which has been executed by the parties. While we do not believe that an agreement to seal and/or not to oppose any portion of the Stipulation which was intended to protect the best interests of the Children, should be used as a bargaining chip, or threat for setting aside the substantive agreement reached between the parties regarding the custodial issues.

Since the execution of the Stipulation and the Court's issuance of its minute order, there have been several negative public postings regarding the content of the Stipulation and substance of the parties' agreement. Given the content of these postings it is evident that information being disseminated to third parties or agents exceeds the information contained in the minute order. Given these developments which have come to light after the execution of the Stipulation, it is Ioan's wish to request the Court seal the entire Stipulation. You have advised that Alice opposes this request. If Ioan is forced to file a motion to seal the entire Stipulation, in support of his request, he will have to provide the following information regarding the case history. Given that the parties have resolved their custody dispute and with an eye toward minimizing conflict and saving fees, I ask that you review the below information and renew the request to consider not opposing Ioan's request to seal the entire Stipulation. I remain available to meet and confer with you to find a mutually agreeable solution.

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Ioan contends the following which is supported by facts and evidence:

- Alice alienated the children from her ex-Mother-in law (Ioan's mother) years prior to the divorce. For the better part of 10 years, Ioan's mother was not allowed into the house and not allowed to speak to the children. Alice encouraged this and her contacting Ioan's mother is further manipulation based on her own personal gains. Alice's conduct toward Ioan's mother was documented and supported the DVROs issued against her.
- With regard to online trolls, please find attached examples of Alice's behavior and, in turn, the hundreds to thousands of headlines it has generated about Ioan and Bianca for the past 3 and a half years. While you claim that Ioan publicized the parties' custody dispute, the fact is he had no choice but to file for custody due to Alice's withholding of the Children. Attached are examples of what Alice was, and is doing regarding not allowing the children to see Ioan. The filing for custody came due to Alice's own conduct. Even so, for months prior to filing, Alice was advised that unless she allowed access to the Children and the parties were able to reach some temporary agreement, Ioan would have no choice but to seek court intervention and file a public request.
- The DVRO filing was also in the same vein. Alice stated and threatened in person, in texts, and in emails, that she would make the divorce as public as possible. Alice also sent the same threats to Ioan's mother stating she was going to the media. Ioan was forced to block all of Alice's contact, and it was ordered that OFW be used instead for communications. This did not stop Alice and she continued her online campaign and she used OFW to harass Ioan. Again, for months Alice was warned that her constant harassment via emails, OFW and social media was abusive and that unless she stopped Ioan would pursue a DVRO. Despite these warnings, Alice continued with her conduct and Ioan was forced to file the request for DVRO, which included the accompanying evidence to support it. As you know the DVROs were granted in Ioan's favor. A copy of the DVRO request is attached.
- Thereafter, Alice engaged in multiple paid interviews where she made false accusations about Ioan and Bianca, causing mass online abuse and hate towards them. After one live interview was conducted on "The Lorraine Show" in the UK on November 12, 2021, Alice sent Ioan the attached email stating; "***Want More?***"

- As to Ioan's decisions regarding the terms of the custody stipulation, the reasons for and evidence in support thereof are outlined above. The alienation and abuse orchestrated by Alice was causing the children more harm and Ioan's decision was based on his wish to stop the ensuing damage to and protect the children.
- In 2021, Alice somehow found out that Bianca suffers with Multiple Sclerosis and outed this information publicly, long before Bianca was ready to do so. This caused such great distress on Bianca that she had two further MS attacks. One to her brain, and one to her spine. Alice has sent, and continued to do so up until her last OFW message sent in August 2023, constant postings and messages attacking Bianca's MS.
- 2.5 years after Alice exposed Bianca's MS, Bianca made progress on her condition and made a post about the difficulties involved with having her MS publicly exposed. This post prompted an unexpected flurry of messages and comments from users sharing their own experience of being bullied by Alice over the past 20 years, where they shared Alice had stalked, threatened their babies and children, abused them, contacted peoples' work places to have them fired, and many more shocking stories of her behavior spanning 20 years. The private messages sent to Bianca can be attached to the motion to seal to establish Alice's pattern of conduct. The comments from hundreds are people remain publicly available for view on Bianca's Instagram page.
- Alice's consistent, provocative social media posting causes fighting that Alice is still engaging in herself, which information is publicly available in the comments of all her posts. Alice's previous lawyers would monitor her social media due to her own behavior.
- Ioan has not been active online and very rarely does anything on social media. Bianca uses her social media for positive communication and that is reflected on her social media and in the comments, she receives and replies to.
- In December 2023, Alice was caught behind a fake twitter account that was being used to harass Bianca and I, and as well as post libelous claims such as us being physical child abusers. Attached is the email received from Detective Jose Morales who was investigating Alice, stating that in the documents that he subpoenaed from

Twitter, he was able to link Alice to at least one of these fake accounts being used in this online campaign.

- Alice's journalist friend, Alison Boshoff, was caught in June 2023 publishing information from Ella's DVRO request that was not publicly available for 4 days after the article she wrote. This mistake made by both Alice and Alison was also brought up in the responsive declarations to the DVRO filing. See attached section of the article from Alison Boshoff.
- Since Alison's recent article about the custody Stipulation, Alice's brother Tony has been seen on Twitter sharing the article and encouraging people to read it. Attached is the screenshot of his post. Since Tony's post about this article, Alice has recently made a public comment stating that everything is about to become publicly available soon. Attached is Alice's public comment made on June 17, 2024.
- Most recently, Alice and her brother Tony have continued to make statements online. On June 25, 2024, Tony stated that Alice's DVRO will "run out soon" and continuing to imply that she will be back to historical pattern of conduct once and if the restraining orders are lifted.
- On June 26, 2024, Alice again stated that she is going to be making everything public shortly. This again a clear confirmation of Alice's motive and *modus operandi* as evidenced throughout the course of this case.

It is Ioan's position that the above are only a few examples of Alice's historical pattern of behavior in making everything public, even at the expense of the children's best interest.

Also provided for review is a file that has been created by people online who have been witnessing Alice's behavior for many years. A PDF of the first page of the file is attached, and one can see that there are 7500+ pages of Alice's posting since July 2020 alone. Each page containing between 3-5 posts. An estimated 30,000 social media posts and comments. The link to this document can and will be provided of this entire file at your request.

On June 19, 2024, Alice made a post claiming that Ioan and Bianca are behind trolling and online gossip sites. This claim is not only highly false and defamatory, but this site, and Alice's gossip chain, has been active and discussing Alice for years prior to the divorce, clearly having nothing to do with Ioan or Bianca.

Janina A. Verano
June 26, 2024
Page 5

On June 23, 2024, Alice made yet another public claim to be “filing” to make everything public soon. Both posts are included in the PDF.

Per Alice’s statements, she continues to make false claims, as well as threats to make everything public. Alice has also stated in the past few days that the children follow her online and see everything on her social media. By her own admission, she continues to expose them to disturbing and detrimental online behavior.

Alice also continues to use Ioan's last name in her Instagram user name “@AliceEvansGruff”. This has been done purely to taunt Ioan and create distress as Alice *never* legally changed her maiden name to Ioan's last name and has never used Ioan's last name in life. Alice has falsely claimed that she cannot change the account name, which can easily be done in Meta settings.

In light of Alice’s past and present conduct as outlined above, Ioan is seeking to have the entire Stipulation sealed. If as you represent Alice is not interested in using the content of the Stipulation for her own public agenda, she should not have an issue with not opposing Ioan's request to seal the entire Stipulation and let the Court decide the issue.

I am open to discussing additional portions of the Stipulation to be sealed (in addition to the two paragraphs already agreed to). Given the history of this case and the toll it has taken on the children, I invite you to work with me to resolve this dispute cooperatively.

I remain available to meet and confer with you and look forward to your response.

Very truly yours,



AZITA AVEDISSIAN
Elkins Kalt Weintraub Reuben Gartside LLP

AA: aa
Enclosures as stated
cc: Elise Greenberg, Esq.

EXHIBIT B



The Princess of Wales going through difficult health issues and then bullied into revealing these has brought up many thoughts and feelings.

It is MS Awareness Month and I want to share with you my personal experience of being publicly bullied and having MS.

During 2018 - 2021 it was a particularly difficult period in my life. An aggressive MS diagnosis, decided life was short and changed careers, I left an abusive marriage after many years, lived on my own for a year, began healing, worked on my health, fell in love with someone from 11,000kms away during a worldwide travel ban, I was police relocated from my home in Brisbane, and then finally after 3 years of battling for myself and my life, and after months of being assisted by Queensland Police with visas, etc, I arrived in France on 25 September 2021 where I would begin my new journey and new life.

One month after landing in France, I was used as collateral in one of the most unbelievable post separation abuse campaigns that many have seen.

Within days of the abuse starting, the MS was discovered, and my secret health issues were publicly, and very happily exposed. My privacy, safety and health were taken away. Years of surviving, battling, keeping it hidden, growing, learning - the proudest 3 years of my life. 3 years were replaced with terrible made-up stories, outing the MS and years of a non-stop stream of lies and bullying across social media and in turn, the media. Online campaigners tagging me in, and sending me, "Walking stick give aways" and "Wheelchair sales" posts, my family and I received hundreds of messages of hate saying they hope the MS kills me, that I should kill myself, that my family should be ashamed to be linked to me... A journalist with the daily mail who is also a close friend to the person conducting the campaign emailed with the same false story being stated online, as well as threatening to expose the MS. Constant taunting of the MS (with the last email targeting the MS only a few months ago), a particularly disturbing moment after a live interview with a British talk show on 11 November 2021 was carried out. Hours after the interview finished, receiving the email "Want more?" ... Days later a similar voice messages with laughter and further threats of 'doing much worse than Lorraine'.

It was 2 months before I finally built up the courage and made the decision to take over my story and do the video discussing my diagnosis for the first time.

So, why am I bringing all of this up for MS awareness month?

Because it's not ok! Because we have no idea what a person is really going through in life and don't have the right to assume. Because the world watched on and demanded answers from Princess Catherine and when they weren't getting any, made up their own stories and pushed them as real. I didn't deserve to have the MS exposed, made so much worse by the lies and harassment attached.

We have to do better. A chronic illness diagnosis, no matter the illness, is huge and it takes serious work and a lot of time to come to terms with.

All of this affected my health, having two MS attacks - one in January 2022 to my brain and one in October 2022 to my spine. Thankfully, through deep healing and professional help, I managed to remove myself, worked hard on calming the MS down, and I searched for a reason and for the positive in my situation. I actually found many positives!

Everyone is unique and has their own journey. This could have ended badly for someone who was struggling to accept it, who wasn't coping mentally, who had never lived under that level of abuse...

Then they all call that a tragedy...



iambiancawallace 



This is ongoing and sometimes feels as though it won't end. As mentioned, the last email sent regarding my MS was just months ago. Detectives on this case linked the fake Twitter account being used to the person in November of last year. It doesn't end.

All that can be done is remove ourselves from the situation and move on with living life.

To close off MS awareness month, this is what want to shine the light on - Health, abuse, and bullying. Because it happens far too often, and it is life destroying to so many people. So many incredible humans (I mean literally thousands of you!) have contacted me over the past 2.5 years to show nothing but pure and genuine love, support, and kindness and for that I will forever be grateful.

This is a safe space on social media, and it always will be. Let's keep trying to make the world a better place by simply being good humans together.



I want to keep this short and simple -

This has completely thrown me. What Ioan's ex has done to so, so many of you over 20 years is some of the darkest shit we have seen and finding out that what's happening to us isn't new and has been happening for decades, has been confronting, but also strangely reassuring.

Thank you so much for sharing your personal stories and experiences of abuse with this same person. We are completely heartbroken to learn what has been going on for so long. We knew what was happening to us was bad, but hearing so many of your own stories has made this so much worse.

Because of the level that this has gone to and the sheer volume of information we have received, I am going to get advice on how to go about this and to ensure that everyone who has been victim to this person feels safe and protected for having come forward.

If anyone receives anything, including threats and intimidation from this person, the family and supporters, give me everything. I am going to ensure everyone is safe from further harassment, threats and abuse.

Since working on healing 10 years of DV, abuse, spine surgery, diagnosis', police relocations, public abuse campaign - If I have not already made this clear - I will never be abused or bullied again.

The dark is coming into the light now.

EXHIBIT C



Post



Andrea Burkhardt



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@aburkhardtlaw

In the most predictable development ever, Alice Evans spent yesterday on Instagram accusing her ex-husband of leaving her and their children impoverished. Today, I've filed reports from a forensic accountant showing that she's had tens of thousands of dollars in her account every time she's claimed to be penniless, including when she started a GoFundMe; she's been paid hundreds of thousands of dollars in child and spousal support, including about \$400k more than she was owed; she receives deposits to her account that she has neither explained nor reported as income; and she spends it all at a rate of about \$15k per month.

Screenshots below.

10:28 AM · 8/27/24 · 127K Views



Most relevant replies ▾



Andrea Burkhardt



8/27/24

According to Alice, as of yesterday: She's so poor that "working women" had to help her buy school supplies for her kids.

Post your reply





Andrea Burkhart 11.5K posts

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Andrea Burkhart 8/27/24

Meanwhile, in reality, Alice just lies about her financial situation:

The screenshot shows a legal document with the following text:

16. Alice has shown a pattern of claiming exaggerated poverty in the press in a concerted effort to ruin my reputation. However, Alice's claims are demonstrably false. On March 13, 2022, Alice made a public post about becoming homeless, which information was patterned in the press. However, during this same time, Alice had personal funds available to her of \$125,951.50 (converted to USD in her UK account) and \$30,958.52 (in her US account) for a total of \$156,910.02 at the time of this public claim. On June 20, 2022, Alice created a GoFundMe page begging the public for donations stating she was completely penniless, asking the public for "anything you can spare"; the press patterned these claims on her behalf. However, during this same time, Alice had a total of \$78,740.50 (converted to USD in her UK account) and \$7,717.00 (in her US account), totaling \$86,457.50 available to her from her personal accounts at the time of this claim. On the November 12, 2022, Alice publicly stated online, "So that's it I am completely broke. I have a three day window of me, two kids to feed, bank after, and ZERO in the bank. I have spent my life savings over the last 2 yrs since my ex left me. I have paid for everything."

27. This includes my recent advance of \$30,000 in support, pursuant to our Regulation and Order re Distribution of Funds, Specific Child Support, Advance of Special Support under PSA and the Attorney's Fees and Costs received December 12, 2023. See Respondent's Exhibit E.

MARRIAGE OF GRIFFIOD & EVANS, ET AL. DECLARATION OF PETITIONER PAGE 2

1. while being a full time mom. Now it's all gone." Again, during this same time, Alice had \$23,751.89 (converted to USD in her UK account) and \$1,014.11 (in her US account), totaling \$24,766.02 in personal funds available to her when she made these claims. Attached hereto as Exhibit 18 and incorporated hereto by this reference is a true and correct copy of Alice's above-mentioned public statements along with her relevant account statements from the time each statement was made.

The table titled 'SPECIAL SUPPORT' is as follows:

	12 Months	12 Months	12 Months	7 Months
Special Support Due to Ms. Evans	\$ 38,813	\$ 5,944	\$ 21,851	\$ 4,471
Less Special Support Payments by Mr. Griffith	(\$24,801)	(\$2,065)	(\$2,672)	(\$2,000)
Special Support Due (if-owed) by Mr. Griffith	\$20,000	\$1,879	\$ 19,129	\$ 2,471

5 10 203 16K



Andrea Burkhart 8/27/24

Replying to @aburkhartlaw

According to Alice, as of yesterday: She's so poor that "working women" had to help her buy school supplies for her kids.

Because I have been put through hell for the past four years and yet... so many women have come to my aid. Financial, emotional, physical even (you know who you are - moving out of a house I'd lived in for 17 years in 5 days would have been impossible without you...)

I have tried to make a habit of helping people all my life. Not just women, but mostly women. I did it because I love people and love women especially. I never thought that one day I would need so much help myself - not just me but my daughters too. I'm absolutely humbled by how you all came through for me.

It's not over yet, sadly. My eldest just got points taken off her grade for not having the correct supplies on time (because we didn't have enough funds in the bank to purchase them). My kids haven't been on vacation in 5 years. I can't take them to the doctor except for emergencies because we owe a deductible to the pediatrician (thank you, Dr Sammy, for seeing Ella this morning regardless)

But we're surviving. And it's really only because of all of you. I don't want to name you because you'll get trolled but you know who you are.

One day I'll get to thank you properly. And hopefully return the immense gift you have given us.

A. V. R. D. S. O. B. A. M. A. P. K. A. F. C. S. L. S. D. C. ... And I'm sure I have forgotten some... THANK YOU. ❤️

@peggy.r.hedges Thank you for our knees. Even Trump paid child support and I had no idea what could have happened to him and thought was a good man. I am completely shocked.

28 likes Reply

@sian_lp Thank you. So much love. You are an absolute angel. Think about it - thousands of mothers offering to help me out and my father has decided not to!

likes Reply

6 8 207 16K



Andrea Burkhart 8/26/24

So many thoughts about this development, but what immediately jumps to mind:



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Andrea Burkhart · 7/2/24

As soon as I saw the ever credulous @alisonboshoff had another piece out about her bff Alice Evans's starving kids, I knew Malice had filed something she didn't want people to see. I was not disappointed.

ANOTHER messy twist as she accuses him of leaving her so poor she can't 'afford to feed their children' and has to go on food stamps - while he 'buys Rolexes and diamonds'

1.1k comments



PETITIONER: Joan Gruffield
RESPONDENT: Alice Evans
OTHER PARTY: ALICIA
CASE NUMBER: 21STFL02019

he following people live with me:

Name	Age	How the person is related to me (or surr)	That person's gross monthly income	Pays some of the household expenses
[REDACTED]		Daughter	\$ 0	Yes
				Yes
				Yes
				Yes

average monthly expenses Estimated expenses Actual expenses Proposed needs

Home	Laundry and cleaning
(1) <input checked="" type="checkbox"/> Rent or <input type="checkbox"/> mortgage: \$ 6,500	i. Clothes: \$
if mortgage:	j. Education: \$
(k) average principal: \$	k. Entertainment, gifts, and vacation: \$
(l) average interest: \$	l. Auto expense and transportation (insurance, gas, repairs, bus, etc.): \$
(2) Real property taxes: \$	m. Insurance (life, accident, etc.; do not include auto, home, or health insurance): \$
(3) Homeowner's or renter's insurance (if not included above): \$ 0	n. Savings and investments: \$
(4) Maintenance and repair: \$ 0	o. Charitable contributions: \$
Health-care costs not paid by insurance: \$ 2,000	p. Monthly payments listed in Item 14 (include party in 14 and must total here): \$
Child care: \$ 0	q. Other (specify): \$
Groceries and household supplies: \$ 2,000	TOTAL EXPENSES (a)-(q) (do not add in the amounts in a)(1)(k) and (l)(1) \$ 17
Eating out: \$ 1,000	r. Amount of expenses paid by others: \$
Utilities (gas, electric, water, trash): \$ 2,500	
Telephone, cell phone, and e-mail: \$ 150	

installment payments and debts not listed above

For	Amount	Balance	Date of last pay
usCal Edison	\$ 3,000	\$ 3,000	March 20
WDS	\$ 1,100	\$ 1,100	March 20
Bank	\$ 1,100	\$ 1,100	May 202
	\$	\$	
	\$	\$	
	\$	\$	

39 30 333 31K

Show this thread



Andrea Burkhart · 7/2/24

Meanwhile, Malice's own financial disclosures have been, shall we say, opaque, while she wants loan to pay for a second forensic accountant to look at his accounts for her.

1 representation. This litigation is complex due to the validity of the premarital agreement and
 2 because loan is self-employed and receives income from his loan out corporations. Even if the
 3 premarital agreement is found to be enforceable, it requires accountants to calculate loan's income
 4 from his loan out corporations less certain expenses to calculate the amount of spousal support due
 5 pursuant to the terms of the premarital agreement. loan has a forensic accountant who has received
 6 more than \$55,358.13¹ that has prepared the calculations for him, while Alice has just retained her
 7 forensic accountant. loan has two lawyers: one for custody issues and another for the financial
 8 issues. Alice's current counsel has been paid \$30,000, but \$8,040 was used to retain Ms. Diana
 9 Lesgart as her forensic accountant, which is necessary since loan has had a forensic accountant for
 10 some time. An award of fees in this case is necessary to equal the playing field. \$112,100 in
 attorney's fees and costs is a reasonable amount considering the relative circumstances of the
 parties.



Andrea Burkhardt 🐟🐟🐟...
11.5K posts

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Andrea Burkhardt 🐟🐟🐟🐟🚫🔒 · 6/21/23 ...

The DVRO violations need to be pursued. It was obvious that the accounts were Alice from the beginning, when she was so eager to dunk on the people paying attention that she announced the plot before she was even supposed to know about it.

ere have been a number of ano saw the bruise on my arm and she cal
d myself "child abusers," and re reported the incident from the day t
slipped up a number of times to the West Hollywood police station
accounts. Ella and/or Alice hav inhibit "B," police brochure re incident.
the DVRO against Alice in p
arass, threaten, and disturb the
saw that Ella accessed many of



17 26 213 18K



Andrea Burkhardt 🐟🐟🐟🐟🚫🔒 · 6/21/23 ...

Bianca's response to the TRO petition is devastating. We learned that the overnight visit was Alice's idea, two independent witnesses were alarmed by the children's behavior, and loan will ask to continue the custody trial to get psych evaluations and therapy for the children.

1 we witness...
2 the Ella's behavior would worsen until she got what she wanted.
3
4 9. It is not true, as Ella said in her application for a civil harassment restraining order,
5 that loan and I called her "manipulative, abusive and narcissistic." We heeded Dr. LeGagnon's
6 advice and did not display any negativity at any point during the visit. loan remained calm and
7 continued to try to connect with the girls. I suggested that we all sit down together so that we
8 could talk and get to know each other. I told the girls they could ask me anything they wanted.
9 Ella responded with statements such as "I don't want to fucking know you, etc." I stood next to
10 Dr. LeGagnon during these difficult moments.
11
12 10. The visit lasted around 20 minutes, and Ella became more destructive and
13 aggressive as the visit wore on. Our dog, Bear, had met the girls before and appeared to
14 remember them, as he kept trying to play with them. I explained to the girls that Bear was very
15 excited to see them and would love to play with them. Ella pushed Bear away with her foot,
16 saying, "Fucking dog."
17
18 11. A few minutes later, I was standing at the open laundry door next to the kitchen
19 and holding the door for support. loan was in the kitchen. Ella came close to me and demanded
20 that I move out of her way. She began to shove me, shoving me with her hand and repeating,
21 "Don't touch me, you fucking shit. Don't touch me." I said to Ella that I was not touching her
22 and that she was touching me. Ella then ducked under my arm and walked past me.
23
24 12. In an attempt of shoving both all over me, I maintained all over me
25 kitchen, where it is to "talk" on our counters, and there was no other loan and children in
26 the room.
27
28 13. In context, Ella's account of the incident at the front door is not at all accurate.
29
30 14. I did not stand in front of the door to try to stop Ella. I was following her. Ella
31 opened the front door and then turned back. I wanted to ensure that Ella was following her.
32 Both girls had been threatening to leave the house on their own throughout the visit, so, at that
33 moment, I began to close the door. Ella turned back to the door and thrust her arm into the small
34 opening between the door and the door.





Post



Andrea Burkhardt 🐟🐟🐟🐟... 🔒

@aburkhardtlaw

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What is Alice planning?

No Show

48%

Spectacle

52%

444 votes · Final results

10:49 PM · 5/30/23 · 19K Views



Most relevant replies ▾



A-M @VeritasFilia27 · 5/30/23

Her no showing is her spectacle if I'm honest...though if certain tweets are anything to go by, she's also been planning an awful smear campaign for some time.



loan's 🍞 **Welsh** 🍩 **anxiety** 🍞 · 5/31/23

I think she made a fresh new sock account to spread more bizarre lies instead of collecting any proof at all.

She must've believed it when others claimed that "the jury can easily be swayed by social media."



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Andrea Burkhart 🐟🐟🐟🐟 🏠 🔒 · 11.5K posts

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Andrea Burkhart 🐟🐟🐟🐟 🏠 🔒 · 6/2/23 ...

Reminder of why everyone with a working brain has seen this coming for over a year:

```

10      3. I told Alice that I was unhappy in our relationship in August 2020, and thereafter we
11 started to discuss the possibility of separating. Alice repeatedly told me between August 2020 and
12 our separation on January 1, 2021 that if I left her, she would make false public accusations about
13 me, sell false stories about me to the press, and destroy me and my career (Alice and I are actors, and
14 at times over the years stories about us have been published). Alice told me verbally multiple times
15 that she would do to me what Amber Heard did to Johnny Depp. Alice threatened to tell people I had
16 abused her and our daughters; she threatened to call the police on me if I did not comply with her
17 demands; she threatened to tell people I am a drug addict and put me in prison; she threatened to write
18 a fake diary that reflected an abused victim, and to have the diary published; and she threatened to
19 destroy my mother. Alice told me she would win, and everyone would believe her over me.

```

🗨️ 10 ↻ 12 ❤️ 204 📊 12K 📌 📤



Andrea Burkhart 🐟🐟🐟🐟 🏠 🔒 · 6/2/23 ...

Chippy as hell. I appreciate the lawyer's ride-or-die attitude but he set Tank up to fail if they weren't prepared to do home detention in Baltimore when they asked for it at sentencing. x.com/LazyLeftyOG/st...

This Post is from a suspended account. [Learn more](#)

🗨️ ↻ ❤️ 18 📊 7.2K 📌 📤



Andrea Burkhart 🐟🐟🐟🐟 🏠 🔒 · 6/1/23 ...

This is some bullshit. Due process requires notice and an opportunity to defend. I have no idea what Tank allegedly did - sometimes these violations are chippy as hell and sometimes people do dumb shit - but revoking someone's release "impromptu" 5pm hearing isn't cool. x.com/LazyLeftyOG/st...

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Andrea Burkhardt 11.5K posts

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Andrea Burkhardt · 5/30/23

How interesting. Another lawyer has jumped ship from H.M.S. Alice just weeks from the contested custody hearing, so Alice is representing herself as of now. This is also what she did before the DVRO hearing rather than face all of loan's evidence of her abuse.

MC-050

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Marie A. LaMolinara, Esq., SBN: 226314 Meyer, Olson, Lowy & Meyers, LLP 10100 Santa Monica Blvd., Suite 1425 Los Angeles, CA 90067 TELEPHONE NO.: (310) 277-9747 FAX NO. (Optional) (310) 277-4847 E-MAIL ADDRESS (Optional): mal@molfamlaw.com; nw@molfamlaw.com ATTORNEY FOR (Name): Respondent, ALICE EVANS	FOR COURT USE ONLY Electronically FILED by Superior Court of California, County of Los Angeles 5/30/2023 2:40 PM David W. Slayton, Executive Officer/Clerk of Court, By S. Barajas, Deputy Clerk
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Central District CASE NAME: In re Marriage of Gruffudd/Evans	CASE NUMBER: 21STFL02019
SUBSTITUTION OF ATTORNEY—CIVIL (Without Court Order)	

THE COURT AND ALL PARTIES ARE NOTIFIED THAT (name): Alice Evans makes the following substitution:

- Former legal representative** Party represented self Attorney (name): Marie A. LaMolinara, Esq. for M|O|L|M
- New legal representative** Party is representing self Attorney
 a. Name: Alice Evans b. State Bar No. (if applicable): N/A
 c. Address (number, street, city, ZIP, and law firm name, if applicable): [REDACTED]
 d. Telephone No. (include area code): (310) 270-5313
- The party making this substitution is a plaintiff defendant petitioner respondent other (specify):

***NOTICE TO PARTIES APPLYING TO REPRESENT THEMSELVES**

- Guardian
- Conservator
- Trustee
- Personal Representative
- Probate fiduciary
- Corporation
- Guardian ad litem
- Unincorporated association

If you are applying as one of the parties on this list, you may NOT act as your own attorney in most cases. Use this form to substitute one attorney for another attorney. SEEK LEGAL ADVICE BEFORE APPLYING TO REPRESENT YOURSELF.

NOTICE TO PARTIES WITHOUT ATTORNEYS

A party representing himself or herself may wish to seek legal assistance. Failure to take timely and appropriate action in this case may result in serious legal consequences.

- I consent to this substitution.
 Date: May 30, 2023
 ALICE EVANS Alice Evans
Alice Evans (May 30, 2023 14:07 PDT)
- I consent to this substitution.
 Date: May 30, 2023
 MARIE A. LAMOLINARA Marie LaMolinara
Marie LaMolinara
- I consent to this substitution.
 Date: May 30, 2023
 ALICE EVANS, IN PRO PER Alice Evans
Alice Evans (May 30, 2023 14:07 PDT)

(See reverse for proof of service by mail)

SUBSTITUTION OF ATTORNEY—CIVIL
(Without Court Order)

Form Adopted For Mandatory Use
Judicial Council of California
MC-050 (Rev. January 1, 2009)

Page 1 of 2
Code of Civil Procedure, §§ 284(1), 285;
Cal. Rules of Court, rule 5.1182
www.courtinfo.ca.gov

16 22 244 28K

+



Andrea Burkhardt · 5/30/23

What is Alice planning?

No Show 48%

Spectacle 52%



Andrea Burkhart 🐟🐟🐟🐟...
11.5K posts

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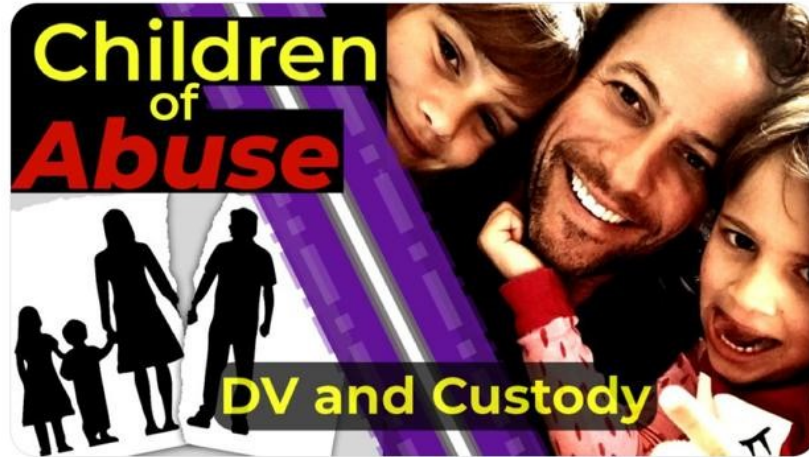
Media



Andrea Burkhart 🐟🐟🐟🐟🚩🔒 · 4/9/23 ...

What happens to the kids when DV shows up in family court? It's not as black and white as you might think. Here, we're looking at loan and Alice's custody dispute and the laws that will affect it now that she's been found to have committed domestic abuse.

youtu.be/cq2AfJL3PbA



🗨️ 5 ↻ 25 ❤️ 140 📺 12K 📌 ⬆️



Andrea Burkhart 🐟🐟🐟🐟🚩🔒 · 4/5/23 ...

Premiering on opening night at Cannes is one hell of a victory lap and I am here for it.

Variety 🏆 @Variety · 4/5/23

Maiwenn's historical drama, "Jeanne du Barry," starring Johnny Depp as Louis XV, is slated to world premiere on opening night of the 76th edition of the Cannes Film Festival. bit.ly/40KnU5J





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Andrea Burkhart 🐟 🐟 🐟 🐟 🏴‍☠️ 🟩 · 4/2/23 ...

Finishing our deep dive into the DVRO petition with Alice's harassment of Bianca, what led to the petition, and how Alice responded. It's a tale of terrible judgment with consequences we'll explore next time when we look at how DV findings affect custody.

youtu.be/u2kD0bJHVb4



🗨️ 11 ↻ 25 ❤️ 150 📺 28K 📌 ⬆️



Andrea Burkhart 🐟 🐟 🐟 🐟 🏴‍☠️ 🟩 · 3/31/23 ...

Join me in a few for our reaction to the US Supreme Court oral arguments in a case that asks whether a novelty dog toy is trademark infringement or a parody with heightened First Amendment protections!

⚖️ **Uncivil Law** 🤖 🟩 @UncivilLaw · 3/31/23

Published on YouTube: Novelty Products and Parody in Jack Daniels v VIP (w/ @aburkhartlaw) youtube.com/watch?v=u-agHZ...

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Andrea Burkhart 🐟 🐟 🐟 🐟 🏴‍☠️ 🟩 · 3/29/23 ...



Andrea Burkhart 🐟🐟🐟...
11.5K posts

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Andrea Burkhart 🐟🐟🐟🐟... ✓ · 2/26/23 ...

Today I'm breaking away from Kohberger and Manson to introduce you to the case of Ioan Gruffudd and Alice Evans. This video describes how I learned about the case and explains why a criminal defense lawyer has things to say about a high-conflict divorce.

youtu.be/JQDzWkuYcju



🗨️ 76 ↻ 87 ❤️ 654 📺 81K 📌 ⬆️



Andrea Burkhart 🐟🐟🐟🐟... ✓ · 2/25/23 ...

Here's part two of my conversation with @colonelkurtz about Ashley Smithline Morgan recanting her accusations against Marilyn Manson. We talk about how this new evidence fits into the legal landscape of his case against Evan Rachel Wood and Ilma Gore.

youtu.be/vDQBLDE-TxA



🗨️ ↻️ ❤️ 4 📊 1.9K 📌 ⬆️



Rando #1428 @felicia_fp1990 · 2/26/23

I heard a bit about this
Ppl say she's crazy cuz of her video's & posts but
any1 ever think maybe she's hurting & worried
about losing her kids & feels she gotta defend
herself to the world
I heard he fat shamed & cheated on her

🗨️ 3 ↻️ ❤️ 2 📊 941 📌 ⬆️



CardFan @hedgeswoman · 2/26/23

Why are you doing this? You only know one side
of this. Alice hasn't had her time under oath.
There are no witnesses to his allegations. She
does have ones that would speak on her behalf
when the proper time arrives. Please don't cause
pain to their lovely daughters. PLEASE.

🗨️ 8 ↻️ 1 ❤️ 7 📊 1.9K 📌 ⬆️



CardFan @hedgeswoman · 2/26/23

You talk about Alice in terms of her "criminal
charge of domestic violence" like she physical
attacked him. SHE DID NOT. It's only words.
Words by a woman who was deeply hurt by loan's
reveal of a mistress in addition to the divorce
action. She isn't allowed to say 1 word re:loan

🗨️ 7 ↻️ ❤️ 7 📊 1.7K 📌 ⬆️



CardFan @hedgeswoman · 2/26/23

In her video she says "domestic violence" like
Alice physically attacked him & she did NOT. It's
WORDS. He doesn't want any words to pass
between them. Boohoo. Ridiculous.

Post your reply

EXHIBIT D

8:10



Post



Andrea Burkhardt 🐼 🐼 🐼 🐼 ...
@aburkhardtlaw

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Well this road trip has been super fun but now it's time to see how "abject poverty" Alice Evans does in court today.



Post your reply



8:13

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Andrea Burkhart 🌐 🌐 🌐 🌐 🌐 🌐 🌐 · 9/9/24 ...

I paused from updating since Alice, of course, told the bailiff I was photographing her (he didn't believe her) and at his suggestion to avoid "false accusations."

🗨️ 8 🔄 3 ❤️ 161 📊 9.6K 📌 📤



Andrea Burkhart 🌐 🌐 🌐 🌐 🌐 🌐 🌐 · 9/9/24 ...

It appears that the hearing may have taken place entirely in chambers. I could occasionally hear loud voices coming from the room but no details of what was said.

🗨️ 3 🔄 1 ❤️ 126 📊 8.1K 📌 📤



Andrea Burkhart 🌐 🌐 🌐 🌐 🌐 🌐 🌐 · 9/9/24 ...

Everyone is now back in the hall and the attorneys are conferring some more.

🗨️ 5 🔄 🔄 ❤️ 105 📊 8.4K 📌 📤



Andrea Burkhart 🌐 🌐 🌐 🌐 🌐 🌐 🌐 · 9/9/24 ...

loan's attorney has just informed the bailiff that they have "reached an agreement." I am back in the courtroom to see if any of it is put on the record.

🗨️ 2 🔄 1 ❤️ 104 📊 7.9K 📌 📤



Andrea Burkhart 🌐 🌐 🌐 🌐 🌐 🌐 🌐 · 9/9/24 ...

Judge is on the bench addressing another case and saying he wants to solve problems, not do forensics. He also comments that the child has a right to a relationship with the parent.

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Andrea Burkhart 🌐 🌐 🌐 🌐 🌐 🌐 🌐 · 9/9/24 ...

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8:13

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Andrea Burkhart 🐼 🐼 🐼 🐼 🐼 🐼 🐼 · 9/9/24 ...

Judge is on the bench addressing another case and saying he wants to solve problems, not do forensics. He also comments that the child has a right to a relationship with the parent.

💬 6 🔄 ❤️ 107 📊 7.6K 📌 📤



Andrea Burkhart 🐼 🐼 🐼 🐼 🐼 🐼 🐼 · 9/9/24 ...

Judge appears to address the clerk on this clerk to say that he is sure the agreement is predicated on an evidentiary hearing, which will require one full day or two half-day sessions. I heard reference to "January." That's quite a ways down the road.

💬 3 🔄 ❤️ 104 📊 8.8K 📌 📤



Andrea Burkhart 🐼 🐼 🐼 🐼 🐼 🐼 🐼 · 9/9/24 ...

Killing time deleting all the abusive DM requests from Alice's flying monkeys on IG, patiently explaining why she is crazy to the ones who ask politely.

💬 7 🔄 1 ❤️ 172 📊 7.4K 📌 📤



Andrea Burkhart 🐼 🐼 🐼 🐼 🐼 🐼 🐼 · 9/9/24 ...

Everyone now coming back into the courtroom. Looks like the agreement is going to be put on the record.

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Andrea Burkhart 🐼 🐼 🐼 🐼 🐼 🐼 🐼 · 9/9/24 ...

The agreements:

On the sealing, there is no dispute about sealing the 2 portions Alice wants. Azita says there is a

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Andrea Burkhart 🌐 🌐 🌐 🌐 🌐 🌐 🌐 · 9/9/24 ...

The agreements:

On the sealing, there is no dispute about sealing the 2 portions Alice wants. Azita says there is a misunderstanding and loan did not ask for the entire thing to be sealed.

🗨️ 1 🔄 1 ❤️ 68 📊 4.7K 📌 📤



Andrea Burkhart 🌐 🌐 🌐 🌐 🌐 🌐 🌐 · 9/9/24 ...

Interim child support of \$3000 per month is agreed beginning 5_1/24. Agreed there are no arrears as of 9/30 and the next payment will be due 10/1. The court reserves jurisdiction to modify pending the evidentiary hearing.

🗨️ 6 🔄 📊 4.6K 📌 📤



Andrea Burkhart 🌐 🌐 🌐 🌐 🌐 🌐 🌐 · 9/9/24 ...

Interim spousal support per guidelines of \$1500 per month as of 9/1/24. There is no penalty for late payment if paid in full by 9/16. Jurisdiction reserved over all credits and retroactively pending the evidentiary hearing.

🗨️ 3 🔄 ❤️ 62 📊 4.4K 📌 📤



Andrea Burkhart 🌐 🌐 🌐 🌐 🌐 🌐 🌐 · 9/9/24 ...

A Gavron warning will be issued.

🗨️ 3 🔄 ❤️ 78 📊 6K 📌 📤



Andrea Burkhart 🌐 🌐 🌐 🌐 🌐 🌐 🌐 · 9/9/24 ...

From the blocked account for attorney fees, \$40k to Alice's attorney and \$25k to loan's attorney.

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8:14

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Post



Alice is sworn in for the Gavron warning. Judge advises that under CA law, each party shall become self-supporting in a reasonable length of time and must make good faith efforts to do so. Failure to make good faith efforts may be grounds to reduce or deny support.

🗨️ 5 🔄 📖 90 📊 5.2K 📌 📤



Andrea Burkhart 🐼 🐼 🐼 🐼 📧 🌐 · 9/9/24 ...

A reasonable length of time is half the length of the marriage. Alice's attorney objects that she has 100% custody timeshare that interferes with her ability to work and the half the time of the marriage calculation applies to short term marriages, which this was not.

🗨️ 6 🔄 1 📖 56 📊 5.5K 📌 📤



Andrea Burkhart 🐼 🐼 🐼 🐼 📧 🌐 · 9/9/24 ...

The evidentiary hearing is scheduled for a full day on February 13, 2025.

🗨️ 5 🔄 1 📖 68 📊 6.2K 📌 📤



Andrea Burkhart 🐼 🐼 🐼 🐼 📧 🌐 · 9/9/24 ...

The court takes a short break to review the redacted and unredacted filings to look at the differences and will return to make findings concerning sealing.

🗨️ 4 🔄 1 📖 74 📊 6.8K 📌 📤



Andrea Burkhart 🐼 🐼 🐼 🐼 📧 🌐 · 9/9/24 ...

I'm updating from my car - scooted out of court as soon as it was done since I knew Alice would be chasing me down the sidewalk with her

Post your reply



8:14

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Andrea Burkhart 🐦 🐦 🐦 🐦 🐦 📧 🌐 · 9/9/24 ...

The two sealed portions relate to the minor children's relationships with professionals that would be privileged if they were adults. Court makes all findings required to seal.

🗨️ 1 🔄 🍷 63 📊 3.7K 📖 📤



Andrea Burkhart 🐦 🐦 🐦 🐦 🐦 📧 🌐 · 9/9/24 ...

loan's attorney raises concern that she was approached in the hall by a man identifying himself as a Daily Mail reporter. She then saw him speaking to Alice and her attorney in a friendly manner. Counsel wants to ensure orders are being followed.

🗨️ 1 🔄 🍷 75 📊 3.8K 📖 📤



Andrea Burkhart 🐦 🐦 🐦 🐦 🐦 📧 🌐 · 9/9/24 ...

Alice's attorney confirms she spoke to the reporter, made a few friendly comments, and simply confirmed the amounts of support that were stipulated to this morning. Court says no need for him to intercede.

🗨️ 1 🔄 🍷 54 📊 3.7K 📖 📤



Andrea Burkhart 🐦 🐦 🐦 🐦 🐦 📧 🌐 · 9/9/24 ...

Alice then approached a grey haired man with a writing pad with some friendly comments of her own, the exact content of which I did not overhear.

🗨️ 1 🔄 🍷 74 📊 8.3K 📖 📤



Andrea Burkhart 🐦 🐦 🐦 🐦 🐦 📧 🌐 · 9/9/24 ...

That's it for today! Thanks for reading.

🗨️ 10 🔄 🍷 111 📊 8.4K 📖 📤

Post your reply



Posts Replies Media

 **Andrea Burkhart** 👤 👤 👤 👤 👤 📧 🌐 · 9/10/24 ...
I did an impromptu recounting of my day observing court yesterday with Alice Evans and Ioan Gruffudd that ended up in the Daily Mail.

youtu.be/fGh-2yimSWE

🗨️ 12 🔄 28 ❤️ 241 📺 14K 📌 📤

 **Andrea Burkhart** 👤 👤 👤 👤 👤 📧 🌐 · 9/9/24 ...
Ok, I finally read the order granting Bryan Kohberger's motion to change venue. I've seen others already note that per the rule cited, Judge Judge will not remain on the case for trial. But the part that jumped out to me is where he said the door to the jury room is not [Show more](#)

🗨️ 18 🔄 30 ❤️ 390 📺 32K 📌 📤

 **Andrea Burkhart** 👤 👤 👤 👤 👤 📧 🌐 · 9/9/24 ...
We are waiting for court to start. Everyone is here. The attorneys have been conferring in the hallway.

 **Andrea Burkhart** 👤 👤 👤 ... 🌐 · 9/9/24
Well this road trip has been super fun but now it's time to see how "abject poverty" Alice Evans does in court today.

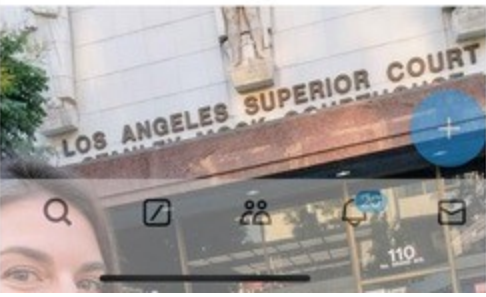



EXHIBIT E



[REDACTED] Your kid tried to get a restraining order on your ex and his new wife to be but wanted to go to Cardiff to see Taylor Swift with him? The maths ain't mathing 😂 he is either a danger to your kids and you don't want him around them or he's a dead beat dad and your kids are desperate for a relationship with him. Which one is it? I'm going with neither, his kids have Stockholm syndrome and are shackled to their mentally unstable mother.

1w 1 like Reply



 @aliceevansgruff Oh please, this is your attempt to rally up your supporters so that they can give you more money because your lazy ass refuses to work. He is paying for your children and paying spousal support, an amount you agreed to after having a full on tantrum in court because he so dared to look in Andrea's direction. Grow up Alice. Be the mother you pretend to be on here and support your damn kids. It wouldn't surprise me that you are making these children sick because of your lack of hygiene in the house, lack of cleaning and lack of any awareness on how to adult. Please do not give this grifter your hard earned cash, she only spends it on La Mer anyway, while her kids walk around in rags.

1w 3 likes Reply



Hey if she wants to support those children all by herself as she has boldly claimed in the court documents and here, and wanted 100% custody, then yes 'your' is correct. Why should he pay for everything when she can contribute but refuses? Alice dug this hole for herself, she conditioned those children to hate their father. Now she has to live with the consequences. I don't blame him for walking away because why should he be abused by his own children at the hands of his narc ex? She's playing you all for a fool and you are swallowing it all up.

1w 5 likes Reply



This is how she wants it. Her children only. I'm just stating at what she has made very clear is her one goal. Those are her kids now, this is what 4 years of hard work on her part have gone into right? Rather than actually working and being a parent.



[REDACTED] he does and had paid more than he should have. Over 400k. Why can't she get a job? This isn't feminism relying on a man to pay for everything. She's more than capable. Plenty of jobs around for her to do. Starbucks, McDonald's, whatever pays the bills. But she won't because those jobs are beneath her.

1w 3 likes Reply



So physically and emotionally abusing your own father, falsifying a court document to claim the girlfriend attacked you, then admitting in court that you lied, stealing from your father and having their Instagram account, emotionally blackmailing the father to send you to a private school. After all that you expect him to just stand there and continue to be abused? Nobody, absolutely nobody has the right to abuse and bully anyone, even a child. When they are older and understand what their mother has done to them, he will no doubt be there with open arms. Until then, for his own mental health and safety, I don't blame him for needing to walk away. And yet is still continuing to financially support them as a parent should. But Alice is telling you a different story and you are eating it up. I know you are not stupid, nobody can be this stupid so please think about all of the inconsistencies of her stories and then go and look at all the evidence. I urge you to please be cautious because she will use you and then throw you away when she's done.

1w 2 likes Reply



[REDACTED] he does and had paid more than he should have. Over 400k. Why can't she get a job? This isn't feminism relying on a man to pay for everything. She's more than capable. Plenty of jobs around for her to do. Starbucks, McDonald's, whatever pays the bills. But she won't because those jobs are beneath her.

1w 3 likes Reply

**REPLY DECLARATION OF
JANINA A. VERANO, ESQ.**

1 August 8, 2024, which is attached to Petitioner’s counsel’s declaration as Exhibit “7”, I told Mr.
2 Langlois that I would be filing the motion out of an abundance of caution and that I was happy to
3 continue to meet and confer with him in order to avoid the hearing on this RFO. Despite my offer,
4 Mr. Langlois did not contact me to discuss the issue until last week when his office contacted me
5 to schedule a conference call to “discuss discovery.” Moreover, all of the meet and confer
6 correspondence attached as Exhibit “7” to Mr. Langlois’ declaration is from *my office*. Mr.
7 Langlois did not provide me with any substantive response.

8 6. Alice is not driving up the cost of this litigation. Alice has only filed 2 RFOs to date –
9 specifically her RFO for temporary support, attorney’s fees and sealing, which she was forced to
10 file because Petitioner refused to respond to my requests to agree to pay Alice temporary support.
11 The cost of that filing could have been avoided had Petitioner agreed to pay Alice temporary
12 support as he did on the date of the hearing. Moreover, the ex parte application to stay Alice’s
13 deposition was warranted and necessary because Mr. Langlois insisted on going forward with
14 Alice’s deposition despite the fact that Alice had filed a motion for a protective order.

15 7. Meanwhile, from my review of the file, the Petitioner caused this proceeding to be more
16 expensive than necessary by filing wholly unnecessary custody litigation, refusing to agree to pay
17 Alice temporary support without litigation, and refusing to agree to adopt any of the custody
18 evaluator’s recommendations and agreeing to a 100% custodial timeshare to Alice despite
19 Petitioner’s insistence that he was concerned that Alice was causing the children “severe
20 emotional harm.”

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

23 Dated: October 1, 2024



JANINA A. VERANO, ESQ.