

1 Neville L. Johnson (SBN 66329)
2 Aleeza L. Marashlian (SBN 332751)
3 **JOHNSON & JOHNSON LLP**
4 439 North Canon Drive, Suite 200
5 Beverly Hills, California 90210
6 Telephone: (310) 975-1080
7 Facsimile: (310) 975-1095
8 Email: njohnson@jllplaw.com
9 amarashlian@jllplaw.com

7 *Attorneys for Plaintiff*
8 Christopher Avellone

9
10 SUPERIOR COURT FOR THE STATE OF CALIFORNIA
11 COUNTY OF LOS ANGELES

12 CHRISTOPHER AVELLONE, an individual,

13 Plaintiff,

14 vs.

15 KARISSA BARROWS, an individual;
16 KELLY BRISTOL, an individual; and DOES
17 1-100,

18 Defendants.

Case No. **21STCV22573**
Assigned to the Hon. Theresa M. Traber

**PLAINTIFF CHRISTOPHER AVELLONE'S
OPPOSITION TO DEFENDANTS KARISSA
BARROWS AND KELLY BRISTOL'S
MOTION TO QUASH, SPECIAL MOTION
TO STRIKE, AND MOTION TO DISMISS;
DECLARATIONS OF JEFFREY DANIEL
JOHNSON, DAUNA L. BARTLEY, AND
CHRISTOPHER AVELLONE**

[Requests for Judicial Notice and Notice of
Lodging Filed Concurrently]

Date: August 11, 2021
Time: 10:00 a.m.
Dept.: 47

Action filed: June 16, 2021

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

TABLE OF CONTENTS

TABLE OF AUTHORITIES 3

APPENDIX 6

Transcript of cited selections from Koobisimo interview raw audio (Decl. Johnson, Exh. 1.) 10

MEMORANDUM OF POINTS AND AUTHORITIES 12

 I. INTRODUCTION 12

 II. ARGUMENT 15

 A. This Court Holds Specific Personal Jurisdiction over Defendants..... 15

 1. Defendants waived a challenge to this Court’s jurisdiction over them..... 15

 2. Application of the Calder “effects” test shows Defendants’ purposeful avilment. 16

 3. Relatedness..... 20

 4. Fair Play and Substantial Justice (Reasonableness)..... 20

 B. Defendants’ Anti-SLAPP Motion Is Baseless 22

 1. Defendants improperly assert that a question of personal jurisdiction is properly
 before this Court when ruling on their anti-SLAPP motion 22

 2. A plain English reading of Defendants’ libels shows they were statements of fact 23

 3. Plaintiff Has Pleaded and Plausibly Demonstrated Defendants’ Actual Malice 23

 C. Defendants Have Utterly Failed to Show That This Forum Is Sufficiently
 Inconvenient to Support Dismissal of the Action..... 25

 III. CONCLUSION 26

DECLARATION OF JEFFREY DANIEL JOHNSON..... 28

DECLARATION OF DAUNA L. BARTLEY 29

DECLARATION OF CHRISTOPHER AVELLONE 31

TABLE OF AUTHORITIES

Cases

American Drug Stores, Inc. v. Stroh,
(1992) 10 Cal.App.4th 1446 15

Animal Film, LLC v. D.E.J. Productions, Inc.,
(2011) 193 Cal.App.4th 466 24

Barry v. State Bar of California,
(2017) 2 Cal.5th 318 21

Bechtel Corp. v. Industrial Indem. Co.,
(1978) 86 Cal.App.3d 45..... 25

Bristol-Myers Squibb Co. v. Superior Court of California, San Francisco County,
(2017) 137 S.Ct. 1773 19

Burdick v. Superior Court,
(2015) 233 Cal.App.4th 8 18, 19

Calder v. Jones,
(1984) 465 U.S. 783 passim

City of Montebello v. Vasquez,
(2016) 1 Cal.5th 409 23

Dongxiao Yue v. Wenbin Yang,
(2021) 62 Cal.App.5th 539 15, 19, 20

Garrison v. State of La.,
(1964) 379 U.S. 64 23

Gulf Oil Corp. v. Gilbert,
(1947) 330 U.S. 501 24

Integral Development Corp. v. Weissenbach,
(2002) 99 Cal.App.4th 576 19, 20

Jay v. Mahaffey,
(2013) 218 Cal.App.4th 1522 25

Keeton v. Hustler Magazine, Inc.,
(1984) 465 U.S. 770 20

Kelly v. New West Federal Savings,
(1996) 49 Cal.App.4th 659 14

1	<i>Live Oak Publishing Co. v. Cohagan,</i>	
2	(1991) 234 Cal.App.3d 1277.....	23
3	<i>Mihlon v. Superior Court,</i>	
4	(1985) 169 Cal.App.3d 703.....	16
5	<i>Morris v. AGFA Corp.,</i>	
6	(2006) 144 Cal.App.4th 1452	25
7	<i>Murray v. Tran,</i>	
8	(2020) 55 Cal.App.5th 10	23
9	<i>Navellier v. Sletten,</i>	
10	(2002) 29 Cal.4th 82	23
11	<i>New York Times Co. v. Sullivan,</i>	
12	(1964) 376 U.S. 254	22
13	<i>Oasis West Realty, LLC v. Goldman,</i>	
14	(2011) 51 Cal.4th 811	23
15	<i>Panavision Intern., L.P. v. Toepfen,</i>	
16	(9th Cir. 1998) 141 F.3d 1316.....	20
17	<i>Piper Aircraft Co. v. Reyno,</i>	
18	(1981) 454 U.S. 235	24
19	<i>Quantum Cooking Concepts, Inc. v. LV Associates, Inc.,</i>	
20	(2011) 197 Cal.App.4th 927	14
21	<i>Reader's Digest Assn. v. Superior Court,</i>	
22	(1984) 37 Cal.3d 244	23
23	<i>Soukup v. Law Offices of Herbert Hafif,</i>	
24	(2006) 39 Cal.4th 260	23
25	<i>Stangvik v. Shiley Inc.,</i>	
26	(1991) 54 Cal.3d 744	12, 24
27	<i>Walden v. Fiore,</i>	
28	(2014) 571 U.S. 277	16, 17
	<i>World-Wide Volkswagen Corp. v. Woodson,</i>	
	444 U.S. 286.....	17
	<i>Zehia v. Superior Court,</i>	
	(2020) 45 Cal.App.5th 543	18

1 Statutes

2 Civil Code section 45a 21

3 Code of Civil Procedure section 410.30 14, 24, 25

4 Code of Civil Procedure section 418.10 14, 24, 25

5 Code of Civil Procedure section 425.16 passim

6 Secondary Sources

7 Bloom, *Proof of Fault in Media Defamation Litigation* (1985) 38 Vand. L. Rev. 247..... 22

8 Restatement (Second) of Conflict of Laws section 37 (1971)..... 17

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

APPENDIX

Declarant	Statement	Defamatory Meaning	Avellone’s Responses to Defenses Interposed by Defendants Barrows and Bristol
Barrows	1. “a man who spent so much time preying on young women (no age check), getting them drunk & taking them to hotel rooms” (Compl. 5:8-10)	This is libel per se, meaning libelous on its face: The reader would reasonably understand the statements to be about Avellone and to mean that Avellone targeted young women, including women under the age of consent, by forcing them to become intoxicated for the purpose of engaging in non-consensual sexual contact.	<ul style="list-style-type: none"> • This Court properly may assert specific personal jurisdiction over Barrows because she directed her conduct <i>at</i> California. • This is not protected opinion. Barrows is not expressing her opinion but is stating as fact that Avellone has engaged in this alleged conduct. • Avellone has pled and submitted evidence that Barrows is lying. (Decl. Avellone ¶¶ 15-17; see Decl. Bartley ¶ 3.) • Avellone has pled and plausibly demonstrated a prima facie case of actual malice.
Barrows	2. “here’s another man to add to the gaming industry predator garbage pile” (Compl. 7:2-3.)	This is libel per se, meaning libelous on its face: The reader would reasonably understand the statements to be about Avellone and to mean that Avellone is a sexual “predator,” meaning he is someone who engages in nonconsensual sexual contact.	<ul style="list-style-type: none"> • This Court properly may assert specific personal jurisdiction over Barrows because she directed her conduct <i>at</i> California. • This is not protected opinion. Barrows is not expressing her opinion but is stating as fact that Avellone is a predator. • Avellone has pled and submitted evidence that Barrows is lying. (See Decl. Avellone ¶¶ 15-17.) • Avellone has pled and plausibly demonstrated a prima facie case of actual malice.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Barrows	3. "He got me blackout drunk on Midori Sours (on the company dime)." (Compl. 8:10-11.)	This is libel per se, meaning libelous on its face: The reader would reasonably understand the statements to be about Avellone and to mean that Avellone forces women to become intoxicated against their will, misappropriating corporate funds for this purpose.	<ul style="list-style-type: none">• This Court properly may assert specific personal jurisdiction over Barrows because she directed her conduct <i>at</i> California.• This is not protected opinion. Barrows is not expressing her opinion but is stating as fact that Avellone engaged in this alleged conduct.• Avellone has pled and submitted evidence that Barrows is lying. (See Decl. Avellone ¶¶ 18, 20; see Decl. Johnson, Exh. 1 at 00:08:45-00:08:53; 00:22:00-00:22:16.)• Avellone has pled and plausibly demonstrated a prima facie case of actual malice.
Barrows	4. "the ONLY reason I was able to refuse him in my blackout stupor was because I was on my period that weekend. The ONLY reason"(Compl. 8:14-15.) "Other nights, I watched him do the same to--other girls, some of whom looked FAR younger than me in my late 20s" (Compl. 8:15-16.) "he was clearly no stranger to doing this when I met him" (Compl. 9:8-9.) "Chris Avellone is an abusive, abrasive, conniving sexual predator." (Compl. 9:9-10.)	This is libel per se, meaning libelous on its face: The reader would reasonably understand the statements to be about Avellone and to mean that Avellone is a habitual "sexual predator" who targets young women, including women that are under the age of consent, for non-consensual sexual contact and to mean that Avellone abusive.	<ul style="list-style-type: none">• This Court properly may assert specific personal jurisdiction over Barrows because she directed her conduct <i>at</i> California.• This is not protected opinion. Barrows is not expressing her opinion but is stating as fact that Avellone engaged in this alleged conduct and that he would not have stopped their heavy petting in spite of her request to stop if she were not menstruating.• Avellone has pled and submitted evidence that Barrows is lying. (Decl. Avellone ¶¶ 15-17.)• Avellone has pled and plausibly demonstrated a prima facie case of actual malice.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Barrows	5. "His behavior didn't stop, though. If anything, it got worse. It took years for his employer to finally fire him." (Compl. 8:26-27.)	This is libel per se, meaning libelous on its face: The reader would reasonably understand the statements to be about Avellone and to mean that Avellone is a habitual "sexual predator" who targets young women, including women that are under the age of consent, for non-consensual sexual contact, that Avellone abusive, and that Avellone was terminated from his then-employment with Obsidian Entertainment, Inc.	<ul style="list-style-type: none">• This Court properly may assert specific personal jurisdiction over Barrows because she directed her conduct <i>at</i> California.• This is not protected opinion. Barrows is not expressing her opinion but is stating as fact that Avellone engaged in this alleged conduct and that he was fired from his employment with Obsidian Entertainment, Inc.• Avellone has pled and submitted evidence that Barrows is lying. (See Decl. Avellone ¶¶ 15-19, 21.)• Avellone has pled and plausibly demonstrated a prima facie case of actual malice.
Barrows	6. "You assaulted & abused my friends." (Compl. 11:4.)	This is libel per se, meaning libelous on its face: The reader would reasonably understand the statements to be about Avellone and to mean that Avellone has assaulted and abused Barrows' friends.	<ul style="list-style-type: none">• This Court properly may assert specific personal jurisdiction over Barrows because she directed her conduct <i>at</i> California.• This is not protected opinion. Barrows is not expressing her opinion but is stating as fact that Avellone engaged in this alleged conduct.• Avellone has pled and submitted evidence that Barrows is lying. (Decl. Avellone ¶ 19.)• Avellone has pled and plausibly demonstrated a prima facie case of actual malice.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Bristol	7. “he [Avellone] groped me repeatedly at [Dragon Con] 2014, by Pulse. Every time you or his gf weren’t looking, his hand was on my ass & he was trying to get me to go to his room.” (Compl. 13:17-18.) “He [Avellone] knew exactly what he was doing. You didn’t see it because he was just that practiced at it.” (Compl. 14:4-5.)	This is libel per se, meaning libelous on its face: The reader would reasonably understand the statements to be about Avellone and to mean that Avellone has sexually assaulted Bristol, and that he did so in a “practiced” manner because he was a habitual sexual assaulter.	<ul style="list-style-type: none"> • This Court properly may assert specific personal jurisdiction over Bristol because she directed her conduct <i>at</i> California. • This is not protected opinion. Bristol is not expressing her opinion but is stating as fact that Avellone engaged in this alleged conduct and is a habitual sexual predator. • Avellone has pled and submitted evidence that Bristol is lying. (Decl. Avellone ¶¶ 16, 22; <i>id.</i> at Exh. 6; Decl. Bartley ¶ 3.) • Avellone has pled and plausibly demonstrated a prima facie case of actual malice.
Bristol	8. “his [Avellone] or any other predator’s” (Compl. 15:16.)	This is libel per se, meaning libelous on its face: The reader would reasonably understand the statements to be about Avellone and to mean that Avellone is a sexual “predator,” meaning he is someone who engages in nonconsensual sexual contact.	<ul style="list-style-type: none"> • This Court properly may assert specific personal jurisdiction over Bristol because she directed her conduct <i>at</i> California. • This is not protected opinion. Bristol is not expressing her opinion but is stating as fact that Avellone is a sexual predator. • Avellone has pled and submitted evidence that Bristol is lying. (Decl. Avellone ¶¶ 15-17; Decl. Bartley ¶ 3.) • Avellone has pled and plausibly demonstrated a prima facie case of actual malice.

1 **Transcript of cited selections from Koobisimo interview raw audio (Decl. Johnson, Exh. 1.)**

2 **TIMESTAMP DECLARANT STATEMENT**
3 (MIN: SEC)

4 00:08:27- CHRISTOPHER Helloooooo.
5 00:08:29 AVELLONE

6 00:08:29 – JAKUB Welcome to the Polish internet. [LAUGHTER] We have
7 00:08:36 RIEDEL bears. And vodka.

8 00:08:37- KARISSA [LAUGHS] We like vodka.
9 00:08:40 BARROWS

10 00:08:40- CHRISTOPHER Yeah, vodka's good.
11 00:08:42 AVELLONE

12 00:08:42- JAKUB Everyone likes vodka.
13 00:08:43 RIEDEL

14 00:08:45- KARISSA Yeah, you know, *Midori* [singing].
15 00:08:47 BARROWS

16 00:08:48- JAKUB Everyone loves bears as well, but, you know, they don't
17 00:08:53 RIEDEL get much media attention.

18 00:21:40- KARISSA Ohhh, Chris, I got Alpha Protocol today.
19 00:21:42 BARROWS

20 00:21:43- CHRISTOPHER Oh you did.
21 00:21:43 AVELLONE

22 00:21:44- KARISSA I did.
23 00:21:45 BARROWS

24 00:21:46- CHRISTOPHER I'm not sure what to say.
25 00:21:48 AVELLONE

26 00:21:48- KARISSA It was like eight bucks.
27 00:21:52 BARROWS Oh my god!

28 00:21:53- CHRISTOPHER If you don't like it, then [CROSSTALK], eight bucks
29 00:21:59 AVELLONE should be easy to pay you back with alcohol

30 00:22:00- KARISSA God! Pay me back. Okay. Let's discuss how much you
31 00:22:05 BARROWS already paid me back with alcohol, *okay* [singing]

32 00:22:07- CHRISTOPHER Those were gifts
33 00:22:08 AVELLONE

1	00:22:08- 00:22:09	KARISSA BARROWS	Oh!
2			
3	00:22:10- 00:22:12	CHRISTOPHER AVELLONE	That was all in the interest of creating beautiful memories.
4	00:22:12- 00:22:16	KARISSA BARROWS	Yes! Achievement unlocked.
5			
6	00:22:16- 00:22:21	CHRISTOPHER AVELLONE	At the exact balance. We got to make sure you don't forget all the happy memories as a result of too many memories being created.
7			
8	00:22:25- 00:22:29	KARISSA BARROWS	Ohhhhhh man. I still can't remember anything from the first night of Dragon Con
9	00:22:29- 00:22:30	CHRISTOPHER AVELLONE	Yeah that was pretty crazy.
10			
11	00:22:31- 00:22:32	KARISSA BARROWS	Most of it. Oh god.
12	00:22:34- 00:22:36	CHRISTOPHER AVELLONE	Only if hotel security had escorted us back to our rooms. They were probably too busy facing with dinosaurs or something or armored warriors or I don't know, probably got locked in combat.
13			
14			
15	00:22:37- 00:22:49	KARISSA BARROWS	Glad somebody finally asked for directions, 'cause that was just complete [LAUGHS]
16			
17	01:37:54- 01:37:57	JEFFREY JOHNSON	Hey, random question. What city are you in?
18			
19	01:37:58- 01:38:04	CHRISTOPHER AVELLONE	I am in Irvine, California, which is perhaps one of the most boring cities known to man.
20	01:38:04- 01:38:06	JEFFREY JOHNSON	Awesome. So you're about twenty minutes away from me.
21			
22	01:38:06- 01:38:07	CHRISTOPHER AVELLONE	Oh, where are you?
23	01:38:08- 01:38:09	JEFFREY JOHNSON	Uh, Chino Hills.
24			
25	01:38:09- 01:38:11	KARISSA BARROWS	He's saying he wants to take you out for beer.
26			
27	01:39:05- 01:39:06	KARISSA BARROWS	This is why I need to move to California.
28			

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. INTRODUCTION**

3 Defendants Karissa Barrows (“Barrows”) and Kelly Bristol (“Bristol”) (collectively,
4 “Defendants”) attempt to frame their unfounded defamation of Plaintiff Christopher Avellone
5 (“Avellone” or “Plaintiff”) as a part of the #MeToo movement. (Defs.’ Mot.¹ 7:3.) However, the
6 evidence attached herein and to the Complaint shows that Defendants’ conduct at issue in fact
7 reflects their involvement in a wholly separate cultural phenomenon: clout chasing, a pathetic
8 desire to obtain online notoriety or attention without concern for damage to others or their own
9 integrity. Defendants’ pitiful need for attention from the online masses came at the expense of
10 Avellone’s professional and personal reputation, causing dramatic repercussions to both his
11 emotional well-being and career as a computer game developer. (Decl. Avellone ¶¶ 27-29.)

12 Defendants have willfully targeted and expressly aimed their libels at California’s
13 computer game entertainment industry, thus purposely availing themselves of the benefits of
14 California under the law, nullifying their Motion to Quash Service of Summons for this Court’s
15 lack of personal jurisdiction over them. Moreover, they have failed to substantiate that motion
16 with a memorandum supporting their position in violation of the California Rules of Court.

17 Contrary to Defendants’ contentions, Barrows’ own statements evidence that her libels of
18 Avellone are false and merely revenge for romantic rejection. (See, e.g., Decl. Johnson, Exh. 2
19 [showing Barrows’ fixation with Avellone and desire to pursue a serious relationship after their
20 one and only sexual interaction], Decl. Avellone, Exh. 9 [same].) Bristol, like Barrows, claims
21 that she made her statements to “stand in solidarity with other women” (Decl. Bristol ¶ 5; Decl.
22 Barrows ¶ 5), however, Bristol’s libels at issue purportedly describe her first-hand experiences
23 receiving unwanted sexual advances from Avellone (Compl. 13:17-14:6; contra Decl. Avellone ¶

24
25 _____
26 ¹ “Defs.’ Mot.” as cited herein refers to Defendants’ Notice of Motion and Motion to Quash
27 Service of Summons, Special Motion to Strike, and Motion to Dismiss, and their Memorandum
of Points and Authorities submitted in support.

1 22; *id.* at Exh. 6; Decl. Bartley ¶ 3) and assert as fact, not opinion, that he *is* a sexual “predator”
2 (Compl. 15:15-17). Alleging a noble motivation will not allow her to escape liability for slander
3 per se. Each defamatory statement made by Barrows and Bristol is isolated and shown to be
4 defamatory and made with actual malice in the Appendix attached to this Opposition. (App.)
5 Plaintiff is more than able to demonstrate his probability of prevailing on his libel per se claims.

6 Furthermore, Defendants have failed to meet the burden of proof borne by the moving
7 party in their motion to dismiss, as simply averring that the factors laid out in *Stangvik v. Shiley*
8 *Inc.* (1991) 54 Cal.3d 744 are met without submitting sufficient *substantial evidence* required for
9 this Court to have the ability to make its discretionary determination cannot possibly be adequate.
10 (See Defs.’ Mot. 17:11-18:12 [failing to supply *any* legal support that Plaintiff’s superior
11 economic status relative to Defendants’ respective statuses substantiates their motion to dismiss].)

12 It is important for this Court to note that Defendants and their counsel have lied under
13 penalty of perjury in the declarations attached to their compound motions. Barrows claims she has
14 “never travelled to California to attend any video-game [sic] industry event” (Decl. Barrows ¶ 4),
15 when she has made public admissions to the contrary. (Decl. Avellone ¶ 24; *id.*, Exh. 10.) She
16 claims she made her public statements “to stand in solidarity with [unnamed] other women who
17 had made similar statements” (Decl. Barrows ¶ 5), but no other “similar” public statements were
18 published preceding her own (Decl. Avellone ¶ 16; see, e.g., Defs.’ Mot 8:27-9:2 [“Another
19 woman, responding to Ms. Barrows’s [sic] statements . . .”). Barrows also declares that she “did
20 not direct any of [her] statements to California or anyone specifically located in California.”
21 (Decl. Barrows ¶ 5.) To the contrary, the Complaint puts at issue her statements directed with
22 particularity at Avellone (Compl. 11:1-5 [“Hey Avellone . . .”]; *id.*, Exh. 1 [same]) and she has
23 acknowledged numerous times that she indeed knows that Avellone resides in California (E.g.,
24 Decl. Johnson, Exh. 1 at 01:37:54-01:38:04; 01:39:05-01:39:06; Decl. Avellone, Exh. 11; see *id.*
25 at ¶ 25). Barrows also claims she made the screenshots attached to Defendants’ motion as Exhibit
26
27
28

1 E using her mobile phone (Decl. Barrows ¶ 6), but Defendants' Exhibit E shows the avatar of
2 Avellone's former casual girlfriend² (the woman pictured immediately adjacent to the words
3 "Tweet your reply"), not Barrows (e.g., Compl. Exh. 1 [showing Barrows' Twitter avatar]),
4 which evidences that Barrows did not make the screenshots herself. Counsel for Defendants,
5 Daniel Allender, states that Avellone's tweets are "no longer publicly available" (Decl. Allender
6 ¶6), but in fact they are archived to the internet. (Pl.'s Req. Judicial Notice, Exhs. 1-4.)
7 Furthermore, both Barrows and Bristol claim they "have never sent a tweet directly to anyone
8 who [they] know to be employed by or affiliated with Entertainment Arts, Inc."³ (Decl. Barrows ¶
9 4; Decl. Bristol ¶4.) However, Defendants have both directly addressed Electronic Arts
10 employees over Twitter. (Decl. Avellone ¶ 26, *id.*, Exhs. 12, 13.)

11 Defendants also argue that the private messages between Avellone and Jacqui Collins
12 ("Collins") "show[] Mr. Avellone making explicit sexual advances in response to straightforward
13 [sic] request for professional help." (Defs.' Mot. 7:10-11.) However, Collins' messages were
14 outside anything near a request for professional help: they were made after 2:00 a.m. EST,
15 involved plans to celebrate her birthday, and the "3rd wheeling exit strategy" which Avellone
16 mistook for a come-on was in fact about Collins being stuck on another couple's date. (Decl.
17 Avellone ¶ 13; *id.* at Exh. 7 [showing, *inter alia*, Avellone's apology to Collins for his
18 misinterpretation].) In a similar vein, though Defendants claim Avellone apologized to them and
19 subsequently deleted those alleged apologies (Defs.' Mot. 7:13-14; *contra* Decl. Barrows, Exh. E;
20 Pl.'s Req. Judicial Notice, Exhs. 1-4 [same]), Exhibit E shows that his apologies were directed to
21 the twitter handle "@GeekyFriedRice," the handle of the woman he once dated, regarding the
22

23 _____
24 ² Plaintiff, in his Complaint, attempted to protect this woman's identity from the public record.
25 However, as Defendants have now identified her in their compound motions (see Decl. Barrows,
26 Exh. E), the woman referred to as Plaintiff's "then-girlfriend" throughout his Complaint is the
27 woman whose account was used to create the screenshots. (Decl. Avellone, ¶ 10.)

28 ³ Clearly, Defendants are referring to computer game company Electronic Arts, Inc., also known
by its short form "EA," which formally employed Avellone and released a statement in reaction
to Barrows' allegations. (Compl. 12:12-23; *id.*, Exh. 3.)

1 manner in which they split. (Decl. Barrows, Exh. E; Decl. Avellone ¶ 10; see Compl. 4:11-15.)

2 Based on the facts set forth in the Complaint, this opposition, and the declarations and
3 exhibits attached herein, this Court should DENY Defendants’ compound motions made pursuant
4 to Code of Civil Procedure sections 410.30, 418.10, subdivisions (a)(1) and (a)(2), and 425.16 in
5 their entirety.

6 **II. ARGUMENT**

7 A. This Court Holds Specific Personal Jurisdiction over Defendants

8 1. *Defendants waived a challenge to this Court’s jurisdiction over them*

9 As a threshold matter, Plaintiff points to California Rules of Court, rule 3.1113(a) and (b).
10 This rule states unambiguously that “[a] party filing a motion . . . *must* serve and file a supporting
11 memorandum. The court may construe the absence of a memorandum as an admission that the
12 motion . . . is not meritorious and cause for its denial.” (*Id.* at (a), italics added.) Furthermore, the
13 memorandum that must be served and filed “must contain a statement of facts, a concise
14 statement of the law, evidence and arguments relied on, and a discussion of the statutes, cases,
15 and textbooks cited in support of the position advanced.” *Id.* at (b).) “Failure to make a motion
16 under [Code of Civil Procedure section 418.10] at the time of filing a . . . motion to strike
17 constitutes a waiver of the issues of lack of personal jurisdiction.” (Code Civ. Proc., § 418.10,
18 subd. (e)(3).) Here, Defendants have made such a waiver because a noticed motion without a
19 supporting memorandum is not a motion at all under the California Rules of Court. (Cf. *Kelly v.*
20 *New West Federal Savings* (1996) 49 Cal.App.4th 659, 670 [motions in limine filed without
21 factual support or argument force a court “to rule in a vacuum,” rendering them “meaningless”].)

22 “Rule 3.1113 rests on a policy-based allocation of resources, preventing the trial court
23 from being cast as a tacit advocate for the moving party’s theories by freeing it from any
24 obligation to comb the record and the law for factual and legal support that a party has failed to
25 identify or provide.” (*Quantum Cooking Concepts, Inc. v. LV Associates, Inc.* (2011) 197
26 Cal.App.4th 927, 934.) Though Defendants have noticed their motion to quash service of
27 summons on the grounds of this Court’s alleged lack of personal jurisdiction over them (Defs.’

1 Mot. 2:5-8), their accompanying memorandum fails to present *any* specific supported argument
2 *as to their motion to quash*. (See Defs.’ Mot.) Instead, the *only* discussion of personal jurisdiction
3 contained in their compound motions posits that a claim of lack of personal jurisdiction is proper
4 when ruling on a motion brought pursuant to Code of Civil Procedure section 425.16, which it is
5 not. (Defs.’ Mot. 11:11-13:19; see *infra* Section II.B.1.) This Court should refuse to consider new
6 evidence or arguments first raised in reply papers, barring Defendants from attempting to cure
7 this defect. (Cf. *American Drug Stores, Inc. v. Stroh* (1992) 10 Cal.App.4th 1446, 1453 [“Points
8 raised for the first time in a reply brief will ordinarily not be considered, because such
9 consideration would deprive the respondent of an opportunity to counter the argument[.]”].)

10 However, notwithstanding Defendants’ waiver, Avellone can nonetheless meet his burden
11 of demonstrating this Court’s jurisdiction over Defendants. Though “[a] court may exercise
12 specific jurisdiction over a nonresident defendant only if: (1) the defendant has purposefully
13 availed himself of forum benefits; (2) the controversy relates to, or arises out of, the defendant’s
14 contacts with the forum; and (3) the exercise of jurisdiction comports with fair play and
15 substantial justice.,” this Court can properly exercise personal jurisdiction over Defendants as a
16 result of their libels at issue. (*Dongxiao Yue v. Wenbin Yang* (2021) 62 Cal.App.5th 539, 547.)

17 2. *Application of the Calder “effects” test shows Defendants’ purposeful availment*

18 Plaintiff agrees that both Barrows and Bristol are nonresidents, thus barring a claim that
19 this Court may properly assert general jurisdiction over them. (Compl. 2:5-8.) However,
20 Defendants’ libelous statements at issue were directed at California, thus supporting proper
21 specific personal jurisdiction over them both.

22 [A]n unverified complaint has no evidentiary value in determination of personal
23 jurisdiction [citation], but such pleading has limited cognizable significance as “a
24 bearing upon the decision whether it is fair and reasonable to require the
25 nonresident parties to appear and defend in this state. But the pleader has no
26 burden of proving the truth of the allegations constituting the causes of action in
27 order to justify the exercise of jurisdiction over nonresident parties.” [Citation.]
28 *The plaintiff need only present facts demonstrating that the conduct of defendants
related to the pleaded causes is such as to constitute constitutionally cognizable
“minimum contacts.”* [Citation.]

1 (*Mihlon v. Superior Court* (1985) 169 Cal.App.3d 703, 710, italics added.) Here, Plaintiff
2 pleaded: “This Court has jurisdiction over Barrows and Bristol because they have purposefully
3 availed themselves of the benefits of California by willfully targeting and expressly aiming the
4 effect of their conduct at California: Barrows and Bristol made libelous statements of or about
5 Avellone, a California resident, who has a California-based computer game development career,
6 knowing the computer game development industry that employs Avellone is centered in
7 California.” (Compl. 2:9-14; Decl. Avellone ¶ 3; see Defs.’ Mot. 7:18-19 [Defendants are such
8 avid computer game fans that they have attended multiple conventions].) Furthermore, Plaintiff
9 pleaded that “San Francisco-based video game and entertainment website IGN.com published an
10 interview with Avellone” and that “Barrows replied to a tweet posted by IGN promoting the
11 interview.” (Compl. 5:1-7.) Plaintiff also pleaded that “Business Insider magazine published an
12 article reporting on Barrows’ allegations and California video game company Electronic Arts
13 Inc.’s reaction to her accusations” (Compl. 12:12-14.) and that “San Francisco-based computer
14 game developer online magazine Gamasutra published a report as a result of Barrows’
15 statements” (Compl. 11:20-21), showing that Barrows’ statements had a California audience.

16 In this suit, Defendants’ libels demonstrate the requisite “minimum contacts” required. In
17 fact, all of Defendants’ libels at issue flow from Barrows’ initial statement, which in and of itself
18 shows on its face that it was directed *at* California because it directly addressed a California-
19 based entity reporting on the California-based video game and entertainment industry and that the
20 California industry was, in part, the audience of her statements. Bristol made her libels knowing
21 Barrows’ explosive accusations were followed closely by the video/computer game industry.
22 Therefore, Bristol knew her statements would have a further effect on the California-based
23 industry, Avellone’s career therein, and his personal and professional reputation. Indeed, many
24 computer game companies issued public statements in reaction to their libels

25 Particularly instructive here, *Walden v. Fiore* (2014) 571 U.S. 277 outlays the specific
26 personal jurisdiction “effects” test articulated in *Calder v. Jones* (1984) 465 U.S. 783: “The crux
27 of *Calder* was that the reputation-based ‘effects’ of the alleged libel connected the defendants to

1 California, not just to the plaintiff. *The strength of that connection was largely a function of the*
2 *nature of the libel tort.*” (*Walden, supra*, 571 U.S. at p. 287, italics added.) In *Calder*, the Court
3 held that California’s specific jurisdiction over Floridian defendants who libeled actress Shirley
4 Jones as to her professional competence was proper because, *inter alia*, the libels at issue
5 “impugned the professionalism of an entertainer whose television career was centered in
6 California” and “the brunt of the harm, in terms both of [Jones’] emotional distress and the injury
7 to her professional reputation, was suffered in California.” (*Calder, supra*, 465 U.S. at p. 788–
8 789.) “In sum, California is the focal point both of the story and of the harm suffered. Jurisdiction
9 over [the Floridian defendants] is therefore proper in California based on the ‘effects’ of their
10 Florida conduct in California.” (*Id.* at p. 789 [citing *World-Wide Volkswagen Corp. v. Woodson*,
11 444 U.S. 286, 297–298; Restatement (Second) of Conflict of Laws § 37 (1971)].)

12 Here, the circumstances in *Calder* are paralleled. Defendants’ statements at issue
13 “impugned the professionalism” of Avellone, a computer game developer whose entertainment
14 industry career is centered in California. (Decl. Avellone ¶ 3.) The brunt of the harm Avellone
15 continues to suffer as a result of Defendants’ libels is felt here, measured in both the emotional
16 distress he experiences as a California resident and the ongoing injury to his California-based
17 career. (Decl. Avellone ¶¶ 3, 27-29.)

18 Based on their conduct, Defendants here “must reasonably anticipate being haled into
19 court” in California, just like the *Calder* defendants. As the Court explained:

20 [T]heir intentional, and allegedly tortious, actions were expressly aimed at
21 California. Petitioner South wrote and petitioner Calder edited an article
22 that they knew would have a potentially devastating impact upon
23 respondent. And they knew that the brunt of that injury would be felt by
24 respondent in the State in which she lives and works and in which the
25 National Enquirer has its largest circulation. Under the circumstances,
26 petitioners must “reasonably anticipate being haled into court there” to
27 answer for the truth of the statements made in their article. [Citations.] An
28 individual injured in California need not go to Florida to seek redress from
persons who, though remaining in Florida, knowingly cause the injury in
California.

(*Calder, supra*, 465 U.S. at p. 789-790 [quoting *World-Wide Volkswagen Corp. v. Woodson*, 444
U.S. at p. 297].) Here, Defendants’ libels on their face show that they knew their publications

1 “would have a devastating impact” on Avellone, a Californian with a California-based career in
2 the California-based entertainment industry (Decl. Avellone ¶ 3), because nothing else could
3 possibly come from their public accusations of sexual predation and assault. Like the National
4 Enquirer, Twitter’s users are concentrated in California. (See Pl.’s Req. Judicial Notice, Exh. 5 at
5 p.16-17; *id.* at p. 17, Figure 3.) Under the *Calder* “effects” test, Defendants’ minimum contacts
6 with California are sufficient for this Court to exercise jurisdiction over them. (See *Calder, supra*,
7 465 U.S. at p. 791 [“jurisdiction over [defendants] in California is proper because of their
8 intentional conduct in Florida calculated to cause injury to respondent in California”]; see also
9 *Zehia v. Superior Court* (2020) 45 Cal.App.5th 543, 557 [specific personal jurisdiction over
10 Michigan resident proper when reputational injury would not have occurred but for California
11 audience].)

12 Though Defendants heavily rely on *Burdick v. Superior Court* (2015) 233 Cal.App.4th 8
13 in the context of their anti-SLAPP motion (Defs.’ Mot. 11:15-12:28), a jurisdictional question is
14 an inappropriate inquiry as to Avellone’s probability of prevailing on his claims. (See *infra*
15 Section II.B.1.) Nonetheless, *Burdick* is highly distinguishable. There, “the defendant posted (and
16 removed) allegedly defamatory statements about the plaintiff on the defendant’s publicly available
17 Facebook page” and the court held that “posting defamatory statements about a person on a
18 Facebook page, while knowing that person resides in the forum state, is insufficient *in itself* to
19 create the minimum contacts necessary to support specific personal.” (*Burdick, supra*, 233
20 Cal.App.4th at p. 13, italics added.) Moreover, the *Burdick* defamatory posts did not mention the
21 plaintiffs by name. (*Id.* at p. 16.) Here, Avellone is mentioned by name in Defendants’ libels and
22 his claims do not merely rely on Defendants’ knowledge or lack thereof that he is a California
23 resident: he has specifically pleaded that Defendants directed their intentional conduct *at*
24 California (Compl. 2:9-14) and that there was direct evidence that their postings had a California
25 audience (Comp. 5:6-7, 6:2-3, 11:20-21, 12:12-14; but see *Burdick, supra*, 233 Cal.App.4th at p.
26 25 [plaintiffs failed to produce evidence of a California audience].).

27 Defendants’ faulty reasoning that their conduct cannot be aimed at California because

1 “[n]one of the[ir] statements mention California or concern California-based conduct” (Defs.’
2 Mot. 12:19-20) misses the mark. Here, Defendants’ acts are more aligned with the defendant in
3 *Dongxiao Yue*, where specific personal jurisdiction was properly asserted over a libelous
4 Canadian when his internet posting was directed towards a California plaintiff, on a website with
5 a California audience. (*Dongxiao Yue, supra*, 62 Cal.App.5th 539.) Like Avellone, the *Dongxiao*
6 *Yue* plaintiff “offered uncontradicted evidence that [the social media forum where the libels were
7 posted] had a California audience, and that California residents read the allegedly defamatory
8 postings.” (*Dongxiao Yue, supra*, 62 Cal.App.5th at p. 549 [distinguishing the case from *Burdick,*
9 *supra*, 233 Cal.App.4th 8]; Compl. 5:1-7, 11:20-21, 12:12-14.)

10 3. *Relatedness*

11 Plaintiff bears the burden to show “the controversy relates to, or arises out of, the
12 defendant's contacts with the forum.” (*Dongxiao Yue, supra*, 62 Cal.App.5th at p. 549.) As in
13 *Dongxiao Yue*, “[t]his element is easily satisfied here” because Plaintiff attaches to this
14 Opposition evidence showing Defendants’ libels “injured [P]laintiff’s business and his reputation
15 in California.” (*Ibid.*; Decl. Avellone ¶¶ 3, 27-29.) This “undisputed evidence demonstrates there
16 is an ‘adequate link’ between [P]laintiff’s claims and [Defendants’] contacts with California.”
17 (*Ibid.* [quoting *Bristol-Myers Squibb Co. v. Superior Court of California, San Francisco County*
18 (2017) 137 S.Ct. 1773, 1781].)

19 4. *Fair Play and Substantial Justice (Reasonableness)*

20 “An otherwise valid exercise of personal jurisdiction ‘is presumed to be
21 reasonable.’ [Citation.] Therefore, [the] defendant ‘must present a *compelling*
22 case that the presence of some other considerations would render jurisdiction
23 unreasonable.’” “A determination of reasonableness rests upon a balancing of
24 interests: the relative inconvenience to defendant of having to defend an action in
25 a foreign state, the interest of plaintiff in suing locally, and the interrelated interest
the state has in assuming jurisdiction. [Citation.] The factors involved in the
balancing process include the following: ‘the relative availability of evidence and
the burden of defense and prosecution in one place rather than another; the
interest of a state in providing a forum for its residents or regulating the business
involved; ... and the extent to which the cause of action arose out of defendant's
local activities.’”

26 (*Dongxiao Yue, supra*, 62 Cal.App.5th at p. 549–550, italics original [quoting *Integral*
27 *Development Corp. v. Weissenbach* (2002) 99 Cal.App.4th 576, 591].)

1 law,” namely the restrictions imposed by the due process clause of the Fourteenth Amendment.
2 (*Ibid.*) Nonetheless, and despite Defendants’ waiver of the issue (see *supra* Section II.A.1),
3 Avellone has demonstrated that this Court’s exercise of specific personal jurisdiction over
4 Defendants is proper here. (See *supra* Section II.A.2.)

5 2. *A plain English reading of Defendants’ libels shows they were statements of fact*

6 Though Defendants may claim that their motivation in making their libels “was to express
7 an opinion about Mr. Avellone's character, to warn other women to be careful, and to stand in
8 solidarity with other women who spoke out against him” (Defs.’ Mot. 14:7-9), their allegedly
9 valiant motivation does not negate their liability before this Court. Plaintiff has carefully isolated
10 and identified Defendants’ statements that constitute libel per se, providing their additional
11 statements for context. (Complaint; *id.* at fn. 3; App.) Barrows and Bristol’s libels at issue are
12 statements of facts made under the cover of their first-hand experiences. (App.)

13 3. *Plaintiff Has Pleaded and Plausibly Demonstrated Defendants’ Actual Malice*

14 Actual malice is shown when a statement was made “with knowledge that it was false or
15 with reckless disregard of whether it was false or not.” (*New York Times Co. v. Sullivan* (1964)
16 376 U.S. 254, 279–80, italics added.) While the “reckless disregard” standard that gets the most
17 litigation attention, in Avellone’s suit against Defendants, the most direct route to establishing
18 actual malice is that Defendants’ accusations against him were deliberately fabricated. “The
19 clearest showing of fault under the *New York Times* standard would be proof that the publisher
20 knew that a defamatory statement was false but published it despite such knowledge and without
21 qualification.” (Bloom, *Proof of Fault in Media Defamation Litigation* (1985) 38 Vand. L. Rev.
22 247, 256.) Defendants were not purporting to rely on anyone else’s testimony or experiences
23 regarding Avellone—to the contrary, Defendants claimed first-hand experience with Avellone’s
24 alleged wrongdoing. (Compl.; App.)

25 Avellone has grounded his libel per se claims against Defendants on the supposition that
26 their statements were flat-out lies. As the Supreme Court explained when analyzing the tension
27 between First Amendment freedoms and defamation, “[t]he use of calculated falsehood, however,

1 would put a different cast on the constitutional question. Although honest utterance, even if
2 inaccurate, may further the fruitful exercise of the right of free speech, it does not follow that the
3 lie, knowingly and deliberately published about a public official, should enjoy a like immunity.”
4 (*Garrison v. State of La.* (1964) 379 U.S. 64, 75.) Avellone shows each of Defendants’ deliberate
5 falsehoods seriatim in the declarations and evidentiary submissions attached herein. (Decl.
6 Avellone; Decl. Bartley ¶ 3; see Decl. Johnson, Exh. 2; see also App.) The First Amendment
7 provides no shelter to such deliberate and calculated defamatory falsehoods. Moreover, “evidence
8 of ill will may be circumstantial evidence of actual malice.” (*Live Oak Publishing Co. v. Cohagan*
9 (1991) 234 Cal.App.3d 1277, 1292 [citing *Reader's Digest Assn. v. Superior Court* (1984) 37
10 Cal.3d 244, 257–258].) Here, evidence of Barrows’ ill will towards Avellone supports a finding
11 that she acted with actual malice. (Compl. 11:3-5 [“I do hate you, Avellone”]; Decl. Bartley ¶ 4.)

12 All Avellone is required to do at this anti-SLAPP stage is demonstrate that factually and
13 legally his allegations of actual malice present “minimal merit.” (Compare Code Civ. Proc., §
14 425.16, subd. (b)(1) [a cause of action is not subject to an anti-SLAPP motion where a plaintiff
15 establishes a probability of prevailing on their claim], with *Navellier v. Sletten* (2002) 29 Cal.4th
16 82, 93 [“As our emerging anti-SLAPP jurisprudence makes plain, the statute poses no obstacle to
17 suits that possess *minimal merit*”], italics added.) “To satisfy the probability of prevailing
18 standard, [t]he plaintiff need only state and substantiate a legally sufficient claim.” (*Murray v.*
19 *Tran* (2020) 55 Cal.App.5th 10 [quoting *City of Montebello v. Vasquez* (2016) 1 Cal.5th 409,
20 420].) This Court is not permitted to weigh one submission against the other, comparing the
21 relative strength or credibility of Avellone’s submissions against Defendants’. The obligation of
22 this Court is to “accept as true” any evidence favorable to Avellone. (*Oasis West Realty, LLC v.*
23 *Goldman* (2011) 51 Cal.4th 811, 820; *Soukup v. Law Offices of Herbert Hafif* (2006) 39 Cal.4th
24 260, 291.)

25 Avellone has adequately pleaded and provided factual submissions sufficient to meet any
26 burden he has on actual malice at this early anti-SLAPP motion stage. He has pleaded and
27 reinforced through his accompanying evidentiary submissions in response to Defendants’ motion,

1 multiple grounds supporting his accusations of actual malice. Defendants’ rendition of events and
2 Avellone’s rendition of events cannot both be true. One or the other is knowingly lying. Avellone
3 has pleaded and submitted persuasive evidence that the knowing liars are Defendants. Avellone’s
4 suit should not be stricken.

5 C. Defendants Have Utterly Failed to Show That This Forum Is Sufficiently Inconvenient
6 to Support Dismissal of the Action

7 Defendants claim their relative economic insecurity supplies a sufficient basis for this
8 Court to dismiss the action in its entirety pursuant to Code of Civil Procedure sections 418.10,
9 subdivision (a)(2) and 410.30, subdivision (a). (Defs.’ Mot. 18:3-8.) Barrows claims that she
10 would have to bring her son to California for trial and arrange for childcare. (Decl. Barrows ¶ 3.)
11 Bristol claims she would be rendered jobless and unhoused were she haled into court. (See Decl.
12 Bristol ¶ 3.) Yet somehow, both managed to attend various out-of-state conventions. (Defs.’ Mot.
13 9:4; see also, e.g., Compl.3:17-19, 4:11-12, 4:18-19.)

14 “On a motion for forum non conveniens, the defendant, as the moving party, bears the
15 burden of proof. The granting or denial of such a motion is within the trial court’s discretion, and
16 substantial deference is accorded its determination in this regard. [Citations.]” (*Stangvik, supra*,
17 54 Cal.3d at p. 751–752.)

18 In determining whether to grant a motion based on forum non conveniens, a court
19 must first determine whether the alternate forum is a “suitable” place for trial. If it
20 is, the next step is to consider the private interests of the litigants and the interests
21 of the public in retaining the action for trial in California. The private interest
22 factors are those that make trial and the enforceability of the ensuing judgment
23 expeditious and relatively inexpensive, such as the ease of access to sources of
24 proof, the cost of obtaining attendance of witnesses, and the availability of
25 compulsory process for attendance of unwilling witnesses. The public interest
26 factors include avoidance of overburdening local courts with congested calendars,
27 protecting the interests of potential jurors so that they are not called upon to
28 decide cases in which the local community has little concern, and weighing the
competing interests of California and the alternate jurisdiction in the litigation.

(*Id.* at p. 751 [citing *Piper Aircraft Co. v. Reyno* (1981) 454 U.S. 235, 259–261; *Gulf Oil Corp. v.*
Gilbert (1947) 330 U.S. 501, 507–509].) “Moreover, the inquiry is not whether any out-of-state
witness or evidence might be needed, but whether, on balance, the location of the witnesses and
evidence makes California an inconvenient forum.” (*Animal Film, LLC v. D.E.J. Productions*,

1 *Inc.* (2011) 193 Cal.App.4th 466, 474.)

2 The court’s discretionary determination of a forum non conveniens motion is abused when
3 not supported by *substantial evidence*. (*Bechtel Corp. v. Industrial Indem. Co.* (1978) 86
4 Cal.App.3d 45, 48.) Here, the Court need not address the factors laid out in *Stangvik* because
5 Defendants have not submitted sufficient evidence regarding any of them. In their compound
6 motions, Defendants present nothing to demonstrate that any witness or evidence located outside
7 of California will actually be needed at trial and thus fail to satisfy their burden of producing
8 evidence that is “sufficient to give the court the ability to soundly exercise its discretion”
9 regarding that convenience factor. (*Morris v. AGFA Corp.* (2006) 144 Cal.App.4th 1452, 1462
10 [plaintiffs’ bodily harm suffered in Texas and discovery responses showing nearly 200 Texas
11 witnesses sufficiently evidenced convenience favor of forum outside of California].) Defendants
12 claim that “any ensuing judgement between the parties could not be efficiently enforced in
13 California,” but provide no legal support for that claim, simply citing *Stangvik*’s recitation of that
14 factor. (Defs.’ Mot. 17:22.)

15 Here, by filing a special motion to strike under Code of Civil Procedure section 425.16,
16 Defendants have stayed all discovery, effectively hoisting themselves on their own petards as to
17 their ability to properly move to dismiss for an inconvenient forum or in the interest of substantial
18 justice. Code Civ. Proc., § 425.16, subd. (g) [staying discovery].) They are barred from any
19 attempt to cure this defect in their Reply, and if they endeavor to do so, this Court should
20 disregard any such argument or evidence. (*Jay v. Mahaffey* (2013) 218 Cal.App.4th 1522, 1537
21 [“The general rule of motion practice, which applies here, is that new evidence is not permitted
22 with reply papers”].)

23 **III. CONCLUSION**

24 For the foregoing reasons, Plaintiff respectfully requests that this Court DENIES
25 Defendants’ compound motions made pursuant to Code of Civil Procedure sections 410.30,
26 418.10, subdivisions (a)(1) and (a)(2), and 425.16 in their entirety and GRANTS Plaintiff any
27 other relief the Court deems proper.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DATED: July 29, 2021

JOHNSON & JOHNSON LLP

By /s/ Neville L. Johnson
Neville L. Johnson
Aleeza L. Marashlian

Attorneys for Plaintiff
Christopher Avellone

1 **DECLARATION OF DAUNA L. BARTLEY**

2 I, Dauna L. Bartley, declare as follows:

3 1. I am over the age of 18 and not a party to this action. The matters stated herein are
4 based on my personal knowledge, and if called upon to testify as a witness, I could and would
5 competently testify to the accuracy and truth of such matters.

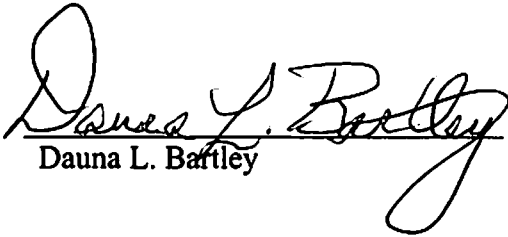
6 2. I submit this declaration in support of Plaintiff Christopher Avellone’s
7 (“Avellone”) Opposition to Defendants Karissa Barrows and Kelly Bristol’s Motion to Quash
8 Service of Process, Special Motion to Strike pursuant to Code of Civil Procedure section 425.16,
9 and Motion to Dismiss based on Code of Civil Procedure sections 418.10, subdivision (a)(2) and
10 410.30, subdivision (a).

11 3. I attended Dragon Con in 2014 and was at Pulse Bar at the Marriott Hotel in
12 Atlanta, Georgia on August 28, 2014, alongside Avellone, Kelly Bristol, Scott, and other Dragon
13 Con attendees. I never witnessed any untoward behavior on the part of Avellone that evening,
14 including, but not limited to, any groping of Kelly Bristol as she has alleged in her public tweets.
15 I never witnessed any alleged confrontation between Scott and Avellone that evening, as Kelly
16 Bristol has alleged to have happened in her public tweets. I did witness Kelly Bristol happily
17 laughing throughout our time at Pulse Bar, including while she participated in various group
18 photos that she and other attendees took throughout the gathering.

19 4. On or about October 26, 2014, I attended social gatherings in Las Vegas, Nevada
20 with a group of friends, including Karissa Barrows. Some members of the group, including
21 Karissa Barrows, had traveled to Las Vegas to visit Avellone’s former casual girlfriend to
22 celebrate her birthday. During a meal, Karissa Barrows expressed her strong animus towards
23 Avellone, elaborating that she, in her words, got Avellone “blackballed” from Dragon Con. To
24 the best of my recollection, Karissa Barrows stated that she aggressively petitioned the relevant
25 track organizers of Dragon Con to bar Avellone from the convention based on what she perceived
26 as his bad acts during his private split with his former casual girlfriend and his accidental
27 appearance at a panel of which he was not an invited panelist during the convention.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, to the best of my knowledge. Executed in Raleigh, North Carolina on the 28th day of July 2021.


Dauna L. Bartley

1 **DECLARATION OF CHRISTOPHER AVELLONE**

2 I, Christopher Avellone, declare as follows:

3 1. I am over the age of 18 and the plaintiff in this action. The matters stated herein
4 are based on my personal knowledge, and if called upon to testify as a witness, I could and would
5 competently testify to the accuracy and truth of such matters.

6 2. I submit this declaration in support of my Opposition to Defendants Karissa
7 Barrows and Kelly Bristol’s Motion to Quash Service of Process, Special Motion to Strike
8 pursuant to Code of Civil Procedure section 425.16, and Motion to Dismiss based on Code of
9 Civil Procedure sections 418.10, subdivision (a)(2) and 410.30, subdivision (a).

10 3. I am a resident and domiciliary of California. It is where I have lived and worked
11 throughout my more than twenty-year career in the computer game industry, having worked
12 primarily at the Southern Californian game developers Interplay Entertainment Corporation and
13 Obsidian Entertainment, Inc., but also for California-based Electronic Arts, Inc. The computer
14 gaming industry is worldwide, but many top studios, including many of my former employers, are
15 based in California alongside the rest of the entertainment industry. My career has been
16 California-based, I have received paychecks to my California address and been employed as a
17 Californian.

18 4. I am an established computer game writer, having written games for blue-chip
19 gaming franchises including *Star Wars*, *Fallout*, *Dungeons and Dragons*, and *Dying Light*. As a
20 result of my career in the computer game industry, I am often invited to conventions promoting
21 computer games.

22 5. On August 30, 2012, the evening before the Atlanta convention Dragon Con was
23 scheduled to begin, I met Karissa Barrows (“Barrows”) for the first time. Later that night, I and
24 two fellow computer game writers escorted Barrows to her hotel room, where her roommate was
25 settled in for the night. When the four of us arrived, Barrows and I kissed and heavy-petted
26 outside her hotel room door. When she told me that “this is not a good idea,” the sexual nature of
27 our encounter stopped. I never had any sexual contact with Barrows again.

1 @GeekyFriedRice handle.

2 11. On August 28, 2014, during 2014's Dragon Con, I visited Pulse Bar at the Marriott
3 Hotel and socialized with the woman I was dating at the time, Scott, Barrows, and Dauna Bartley.

4 12. Between October 15, 2020, and November 6, 2020, I corresponded via email with
5 Scott as to his memory of our time together at Pulse Bar. On or about July 21, 2021, I
6 electronically saved a copy of this correspondence. A true and correct copy of our email
7 correspondence is attached as **Exhibit 6**. Scott's last name is redacted from this document to
8 preserve his privacy.

9 13. From May 24, 2014, to May 25, 2014, I exchanged messages with Jacqui Collins
10 ("Collins") via Facebook Messenger. Collins messaged me from New York City, and I messaged
11 her from California. On or about June 30, 2020, I downloaded these messages via my
12 Facebook.com account and saved them electronically. Because I received these messages to my
13 account, the time stamps on our messages reflect Pacific Standard Time. As stated therein, I
14 honestly misinterpreted her statements as a sexual come-on and replied in kind. I apologized
15 profusely and sincerely. A true and correct copy the Facebook direct messages between Collins
16 and myself that I saved from my Facebook.com account is attached as **Exhibit 7**.

17 14. From July 24, 2020, to July 15, 2021, I exchanged Twitter direct messages with
18 "A" regarding Barrows and her libels at issue. In addition to our conversations, A provided me
19 with screenshots of text messages between Barrows and herself. On or around July 21, 2021, I
20 viewed the messages between myself and "A" and between A and Barrows via my Twitter.com
21 account and saved them electronically. A true and correct copy of the text messages between "A"
22 and myself that I saved from my Twitter.com account is attached as **Exhibit 8**. A true and correct
23 copy of the text messages between A and Barrows that "A" sent to me within Exhibit 8 is
24 attached as **Exhibit 9**. "A"'s name and avatar is redacted from this document to preserve her
25 privacy.

26 15. I have never targeted women of any age, forced any woman to become intoxicated
27 for any purpose, including the purpose of engaging in non-consensual sexual contact.

1 16. I am not a sexual “predator,” meaning I am not someone who engages in non-
2 consensual sexual contact. Barrows, to my knowledge, is the first person to make any such public
3 accusation.

4 17. I have never targeted any person for the purpose of engaging in non-consensual
5 sexual contact, nor is there evidence of such conduct.

6 18. I never forced anyone to become intoxicated against their will.

7 19. I never physically or sexually abused or assaulted anyone, nor is there evidence of
8 such conduct.

9 20. I did not use corporate credit cards or accounts to purchase alcohol for myself or
10 Barrows at Dragon Con 2012.

11 21. I was not fired from my position with Obsidian Entertainment, Inc.

12 22. I never sexually assaulted Kelly Bristol (“Bristol”) or anyone else.

13 23. I never had any kind of confrontation with Scott regarding Bristol.

14 24. In July 2013, I saw Barrows at the San Diego Comic Con convention, a widely
15 renowned convention for fans of computer games and other entertainment media. She reached out
16 to me via Twitter.com to socialize during the convention. On or about July 24, 2021, I searched
17 the web.archive.org for Barrows’ tweets from that event and saved them electronically. A true
18 and correct copy of Barrows’ tweets that I saved electronically from web.archive.org that
19 Barrows made from San Diego’s Comic Con are attached as **Exhibit 10**.

20 25. Barrows knows that I reside in California. For instance, she knew that I was
21 employed at California-based Obsidian Entertainment, Inc. On or about July 24, 2021, I searched
22 web.archive.org for Barrows’ tweet at me regarding this fact and saved it electronically. A true
23 and correct copy of Barrows’ tweet showing that she knew I worked at Obsidian Entertainment,
24 Inc. that I saved electronically from web.archive.org is attached as **Exhibit 11**.

25 26. I worked at Electronic Arts, Inc. for most of 2018 and 2019, and throughout my
26 long career in computer game development, I have come to know many other professionals in the
27 industry. Electronic Arts, Inc.’s twitter handle is “@EA.” Patrick Weekes, John Epler, and Allan
28

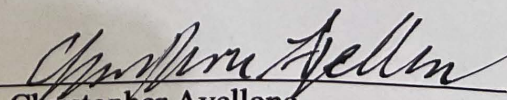
1 Schumacher are all Electronic Arts, Inc. employees. On or about July 24, 2021, I searched
2 web.archive.org for tweets made by Barrows directly addressing Electronic Arts, Inc. or any of its
3 employees and saved them electronically. A true and correct copy of Barrows' tweets directly
4 addressing Electronic Arts, Inc. and its employees that I saved electronically from
5 web.archive.org is attached as **Exhibit 12**. On or about July 24, 2021, I searched web.archive.org
6 for tweets made by Bristol directly addressing Electronic Arts, Inc. employees and saved them
7 electronically. A true and correct copy of Bristol's tweets directly addressing Electronic Arts, Inc.
8 employees that I saved electronically from web.archive.org is attached as **Exhibit 13**.

9 27. As a result of Barrows and Bristol's libels, I have suffered severe harm to my
10 personal and professional reputation. As a result of their libels, several former employers have
11 issued statements distancing themselves from me and it has become very difficult to find work in
12 the computer game industry. I have become a pariah amongst former friends, acquaintances, and
13 colleagues. I fear my professional reputation will never fully recover because even if I am
14 exonerated, there will always be those who believe that Barrows and Bristol's libels are true.

15 28. As a result of Barrows and Bristol's libels, I have suffered extreme emotional
16 distress, including shame, mortification, and hurt feelings. In my darker moments, I have
17 considered suicide as a result of Barrows and Bristol's libels and the injuries they have caused me
18 to suffer.

19 29. As a result of Barrows and Bristol's libels, my earnings from computer game
20 development work have been virtually obliterated. It has become very difficult to find
21 employment in the industry where I spent more than two decades.

22 I declare under penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct, to the best of my knowledge. Executed in Tustin, California on the
24 29th day of July 2021.

25
26 
27 Christopher Avellone
28

**USB FLASH DRIVE DIGITAL AUDIO
EXHIBIT 1 TO DECLARATION OF
JEFFREY DANIEL JOHNSON**

EXHIBIT 1

EXHIBIT 2

Get started

Open in app



Jeff Johnson

Follow

10 Followers

About

Beyond Politics, Beliefs, or Life Choices — This is About Right and Wrong



Jeff Johnson Jul 9 · 5 min read

First Hand Knowledge of the Interaction Between Chris Avellone and Karissa Barrows

July 9th, 2021

As an upfront disclaimer, I haven't been paying much attention to the game industry for the past few years, so the story of Ms. Barrows' claim against Mr. Avellone was not known to me until a recent article on [Forbes](#) by [Erik Kain](#). That is the reason for the timing of my statement.

During 2012 I was involved with a webcomic known as *Marauder Shields*, by Koobismo. This was an unofficial rewrite ending of the Mass Effect video game series. Over time, this project grew into a few other avenues including podcast interviews of game industry legends and amazing voice actors. Due to the success and wide-spread love of the webcomic series, we began bringing in new people to the all-volunteer team. One of those people was Karissa Barrows.

We (Koobismo team) met Ms. Barrows (online) on September 13th, 2012. One of the things discussed with Ms. Barrows was connecting with industry people for interviews. Ms. Barrows mentioned that she knew a lot of people since she attended many comic-

book/video game conventions. She would talk about partying with them at every convention. Ms. Barrows officially joined the Koobismo team September 25th, 2012.

NOTE: I (nor anyone on our team) had ever met Karissa in person. Our entire interaction was over Twitter direct messages (see below), Skype, emails, and phone calls.

During this time, Ms. Barrows mentioned that she could connect us with Chris Avellone and David Gaider, since she recently partied with them at Dragon Con (August 30th, 2012 — September 3rd, 2012). Even mentioning candidly that she had “made out with Chris the first night there.” Ms. Barrows would speak about Mr. Avellone very fondly as if there was a potential relationship there. She clearly liked him, and to us, it almost came across like they were dating (by listening to her). Ms. Barrows was more than willing and excited to set up an interview with Mr. Avellone.

On October 30th, 2012, I entered into a conversation with Ms. Barrows over Twitter Messages. I started out by asking, “Your Con-boyfriend (convention-boyfriend, aka Mr. Avellone) was in *The Guild*?”, referring to Felicia Day’s web series “The Guild”. This began an all-day back and forth about Ms. Barrows expressing how much she desired a relationship with Mr. Avellone and was asking my opinion on the situation. This conversation completely counters what Ms. Barrows has been claiming on social media. This conversation was private and never shared with anyone until now. You can read the screenshots below.

*At this point I did not know Mr. Avellone. Had never had any contact with him. I only knew of his career, nothing about him personally.

- *My text in blue. Ms. Barrows in grey.





he's going to be in this season: I'm a little stoked about it. Con-boyfriend being 41? Who cares. :D

Oct 30, 2012, 2:09 PM

That's not that old. Is he a cool guy? Why not pursue something with him? ;)

Oct 30, 2012, 2:10 PM ✓



Oh he's awesome. So fun and a complete gentleman. I dunno, it'd be cool, but I'm not sure that's what he wants.

Oct 30, 2012, 2:11 PM

Want me to ask him? Lol There are a shortage of good people on this planet. When you find one, hold on to them.

Oct 30, 2012, 2:13 PM ✓



LOL dear god no. I think it'll take more than one con to nail it down. It'll be interesting to see what happens next time I see him.

Oct 30, 2012, 2:16 PM



Karissa 🍵 @👊👊👊👊 | **WEARAMASK** 🧢🔒
@SJBsMama



Heh. True. Just keep the conversation going.

Oct 30, 2012, 2:37 PM ✓



And the alcohol flowing. :D I do what I can.

Oct 30, 2012, 2:44 PM

That you do.

Oct 30, 2012, 2:50 PM ✓

So okay, I was texting with him earlier, and I'm gonna ask your opinion because I'm being a stupid girl and I'm not okay with it. XD

This occurred after I asked if he was going to PAX East...

and he said he really wants to but isn't sure yet...

Me: "You must!! Who will walk me back to my room if you don't go?"



Him: "This question appeals to my gentleman (and not gentleman) instincts."

Oct 30, 2012, 7:51 PM



Karissa 🍷 @👊👊👊👊 | **WEARAMASK** 🤭🔒
@SJBsMama



So... that's good, I'm assuming. In that he's totally okay with continuing D*con into next con. Or that's what I'm getting from it.



I HATE BEING A GIRL OKAY

Oct 30, 2012, 7:52 PM

Yeah, he either really likes you, or really just "wants some". But from what you've told me, I would think he likes you.

Probably not completely sure how you feel. He's questioning if it was a Con only thing, or something more.

If he's a good dude, go for it.

Oct 30, 2012, 9:51 PM ✓



So should I just ASK him if it's just a con thing? I haven't said anything because I don't know how he feels about it.

Oct 30, 2012, 9:52 PM

As you can clearly see, there were no negative feelings for Mr. Avellone. On the contrary, Ms. Barrows was clearly seeking a relationship with Mr. Avellone.

On November 23rd of 2012 our group interviewed Chris Avellone via Skype. The people on the call were Chris Avellone, Karissa Barrows, Phil Hornshaw (currently an editor at *GameSpot*), Jakub Riedel, and myself (Jeff Johnson). The entire call was recorded. Pre-interview banter through interview, to post interview banter. During this call you can clearly hear Karissa's affection and attraction to Chris. While the interview is public on [YouTube](https://www.youtube.com/watch?v=1Lj3YcpbV5U), <https://www.youtube.com/watch?v=1Lj3YcpbV5U>, I will also be releasing all relevant audio from the unreleased audio soon. This was the first time I had ever spoken with Mr. Avellone.

After the recording Mr. Avellone and I planned to meet up on December 20th, 2012. This was the first time Mr. Avellone and I met in person. Ms. Barrows, knowing that I was hanging out with Mr. Avellone, would at most sound jealous that we lived in Southern California and could meet up. She never said a negative thing about Mr. Avellone.

I lost touch with everyone in February of 2013, when I moved to Arkansas.

At no time was anything negative mentioned by Ms. Barrows about Mr. Avellone. She would talk about hanging out with the BioWare people and getting drunk with them. Getting drunk and partying with people at conventions was (and may still be) common for Ms. Barrows. As you can clearly see in her own messages about Mr. Avellone, she

wanted to keep “the alcohol flowing”. Nowhere in any conversation either documented or undocumented (phone calls, video chats, etc.) was anything negative ever brought up about Mr. Avellone. Every conversation was about what a “true gentleman” he is and how fond Ms. Barrows was of him.

This entire story is very new to me. When I saw it in Forbes, I couldn't believe what I was reading. I knew to my core that these accusations were completely false. Not because of some close relationship with Mr. Avellone or Ms. Barrows (which I don't have with either), but because I knew the facts. If I had proof showing the polar opposite, I would have also come forward. If someone is guilty, good, you need to speak up. But attempting to destroy someone with a complete fabrication is something I could not stand by and let slide. When a person lies about something like this, it makes it harder for the real victims of the world.

Unarguable truth has now been presented. As a culture we should always wait to find out the facts before casting judgment on someone. What if this was you or a loved one? This goes beyond politics, beliefs, or life choices. This is about right and wrong, truth and lies.

Be kind to others.

Cancel Culture

Chris Avellone



[About](#) [Write](#) [Help](#) [Legal](#)

Get the Medium app



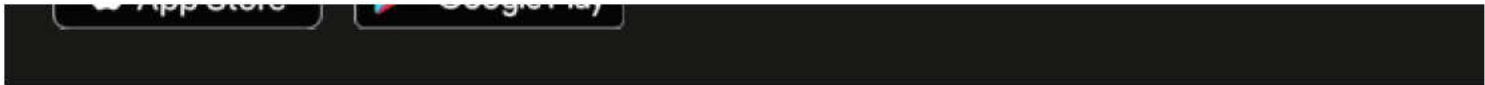


EXHIBIT 3



Search Twitter



Karissa 🍰🍪🍩🍪🍩 |WEARAMASK 🤪

@SJBsMama

Just saw [@BioEvilChris](#) and [@davidgaider](#)! Come upstairs!!

8:09 PM · Aug 30, 2012 · Tweetings Classic for iPhone



David Gaider ✓ @davidgaider · Aug 30, 2012

Replying to @SJBsMama

[@SJBsMama](#) [@bioevilchris](#) Define "upstairs". This is a big place. :)



1



Karissa 🍰🍪🍩🍪🍩 |WEARAMASK 🤪 @SJBsMa... · Aug 30, 2012

[@davidgaider](#) [@bioevilchris](#) 10th floor, left from the elevators! :) N7 Elite meetup :)



1



Chris Priestly @TheEvilChris · Aug 30, 2012

[@SJBsMama](#) [@davidgaider](#) Which hotel?



1

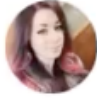


Karissa 🍰🍪🍩🍪🍩 |WEARAMASK 🤪 @SJBsMa... · Aug 30, 2012

[@BioEvilChris](#) [@davidgaider](#) Marriott :D You guys were walking a floor down when I took the elevator up



← **Tweet**



Karissa @🍪🍪🍪🍪🍪 |WEARAMASK👩🏻
@SJBsMama



RT @davidgaider: "What kind of a lush are you, @ChrisAvellone?" "The kind who kisses." "Oh, that's so awful for you."


11:08 PM · Aug 30, 2012 · Tweetings Classic for iPhone

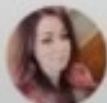


 **Karissa** 🍷@🍷🍷🍷🍷 |WEARAMASK 🤩 @SJBsMama · Sep 2, 2012
@chrisavellone @stevejaros Where will you guys be in like, an hour?

 **Karissa** 🍷@🍷🍷🍷🍷 |WEARAMASK 🤩 @SJBsMama · Sep 2, 2012
Replying to @davidgaider
@davidgaider @JessicaMerizan @chrisavellone Chris and @SteveJaros, on the other hand....

 **Karissa** 🍷@🍷🍷🍷🍷 |WEARAMASK 🤩 @SJBsMama · Sep 2, 2012
After all that, my hotel's bar is totally still serving. @chrisavellone @stevejaros @davidgaider

 **Karissa** 🍷@🍷🍷🍷🍷 |WEARAMASK 🤩 @SJBsMama · Sep 1, 2012
One of the few gentlemen left in the world (that still drink), @chrisavellone :D twitpic.com/apues7

 **Karissa** 🍷@🍷🍷🍷🍷 |WEARAMASK 🤩 @SJBsMa... · Aug 31, 2012
This is even a question? #Avellone (Come back!) RT @BioEvilChris: Clark Gable or @ChrisAvellone ? Vivian Leigh? Ladies? Weigh in.

 **Karissa** 🍷@🍷🍷🍷🍷 |WEARAMASK 🤩 @SJBsMa... · Aug 31, 2012
Replying to @SteveJaros
@SteveJaros @chrisavellone @davidgaider Depends - you guys want to

← **Tweet**



Karissa 🍪 @🍪🍪🍪🍪🍪 |WEARAMASK 🤪
@SJBsMama

You know it was a good night when you remember who got you back to your room, but not HOW.
[@davidgaider](#) [@stevejaros](#) [@chrisavellone](#)

11:35 AM · Aug 31, 2012 · Tweetings Classic for iPhone



Chris Avellone @ChrisAvellone · Aug 31, 2012
Replying to [@SJBsMama](#)

[@SJBsMama](#) [@davidgaider](#) [@SteveJaros](#) That in itself was an adventure - two words: RADIAL. TOWER. It was the worst exploration quest ever.

1



1



Karissa 🍪 @🍪🍪🍪🍪🍪 |WEARAMASK 🤪 @SJBsMa... · Aug 31, 2012
[@ChrisAvellone](#) [@davidgaider](#) [@SteveJaros](#) CURSE YOU RADIUS TOWER!!

2



Steve Jaros @SteveJaros · Aug 31, 2012
[@SJBsMama](#) [@chrisavellone](#) [@davidgaider](#) shennanigans abound!

1

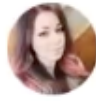


Karissa 🍪 @🍪🍪🍪🍪🍪 |WEARAMASK 🤪 @SJBsMa... · Aug 31, 2012
[@SteveJaros](#) [@chrisavellone](#) [@davidgaider](#) I'm still trying to piece together how it all happened. Unsuccessfully. You guys are the best!





Tweet

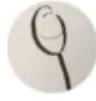


Karissa @SJBsMa... · Aug 31, 2012

You know it was a good night when you remember who got you back to your room, but not HOW. @davidgaider @stevejaros @chrisavellone



2



Chris Avellone @ChrisAvellone · Aug 31, 2012

@SJBsMama @davidgaider @SteveJaros That in itself was an adventure - two words: RADIAL. TOWER. It was the worst exploration quest ever.



1



1



Karissa @SJBsMa... · Aug 31, 2012

@ChrisAvellone @davidgaider @SteveJaros CURSE YOU RADIUS TOWER!!



2



Steve Jaros @SteveJaros · Aug 31, 2012

@SJBsMama @chrisavellone @davidgaider shennanigans abound!



1



Karissa @SJBsMama

Replying to @SteveJaros

@SteveJaros @chrisavellone @davidgaider I'm still trying to piece together how it all happened. Unsuccessfully. You guys are the best!

12:39 PM · Aug 31, 2012 · Tweetings Classic for iPhone



← **Tweet**



Chris "wear a mask, dammit" Priestly
@TheEvilChris



Clark Gable or [@ChrisAvellone](#) ? Vivian Leigh? Ladies?
Weigh in.

11:55 PM · Aug 31, 2012 · [Twitter for iPhone](#)



Amy @amylouise0 · Sep 1, 2012
Replying to [@TheEvilChris](#)



[@BioEvilChris](#) [@ChrisAvellone](#) both at the same time? !





Tweet



Karissa 🍰 @🍪🍪🍪🍪 |WEARAMASK 🤪
@SJBsMama



This is even a question? #Avellone (Come back!) RT
@BioEvilChris: Clark Gable or @ChrisAvellone ? Vivian
Leigh? Ladies? Weigh in.

11:56 PM · Aug 31, 2012 · Tweetings Classic for iPhone





Tweet



Karissa 🍷🍷🍷🍷🍷 |WEARAMASK 🤪
@SJBsMama



One of the few gentlemen left in the world (that still drink), @chrisavellone :D twitpic.com/apues7

2:06 AM · Sep 1, 2012 · Tweetings Classic for iPhone



2 Retweets and comments



Picture below:





Tweet



Karissa 🍷@🍷🍷🍷🍷 |WEARAMASK 🤪

@SJBsMama



After all that, my hotel's bar is totally still serving.

[@chrisavellone](#) [@stevejaros](#) [@davidgaider](#)

2:46 AM · Sep 2, 2012 · Tweetings Classic for iPhone

1 Like





Karissa @SJBsMama |WEARAMASK 🍷



[@learenberg](#) Karissa here! It was so amazing to hang out! Let's do that every year. Because drinking and DMs are fun.

1:44 PM · Sep 3, 2012 · Tweetings Classic for iPhone





Karissa 🍷@🍷🍷🍷🍷 |WEARAMASK🙄
@SJBsMama

I'm supposed to be drinking with [@chrisavellone](#), [@SteveJaros](#), [@davidgaider](#), and [@BioEvilChris](#) right now, not schooling. Post-con sucks.

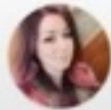
11:47 PM · Sep 4, 2012 · [Twitter Web Client](#)



Chris Avellone @ChrisAvellone · Sep 5, 2012

Replying to [@SJBsMama](#)

[@SJBsMama](#) [@SteveJaros](#) [@davidgaider](#) [@BioEvilChris](#) The worst part of yesterday? 5pm, realizing our crew wasn't meeting up anywhere to toast.



Karissa 🍷@🍷🍷🍷🍷 |WEARAMASK🙄 @SJBsMama · Sep 5, 2012
[@ChrisAvellone](#) [@SteveJaros](#) [@davidgaider](#) [@BioEvilChris](#) Many sad faces. :(





Karissa 🍷@🍷🍷🍷🍷 |WEARAMASK 🤪
@SJBsMama



Top 5 D*C moments: 1) Every night 2) Parade 3) Meet @bioware panel w/ @RaphaelSbargе, @Mark_Meer, @BioEvilChris, @davidgaidеr (cont.)

11:56 AM · Sep 4, 2012 · Tweetings Classic for iPhone



Search

← Tweet



Karissa @SJBsMama |WEARAMASK

#Top5D*C 4) Random laughing fit moment with @RaphaelSbarg and Tony Amendola during the @OnceABC panel 5) @chrisavellone and @SteveJaros

12:25 PM · Sep 4, 2012 · Twitter Web Client

1 Retweet and comment



Amanda Sims @lightforged_ · Sep 4, 2012

Replying to @SJBsMama
@SJBsMama I think I'm a little offended I'm not on any of your lists. Especially considering we were together for most of your Top 5s. :-P



Karissa @SJBsMama |WEARAMASK @SJBsMama · Sep 4, 2012

@galley_winter Because you were not a MOMENT -- you were an EXPERIENCE! This is also why other specific people don't appear "in general" :D



Amanda Sims @lightforged_ · Sep 4, 2012

@SJBsMama LOL!! You're quite the experience yourself. Don't know what my Con would have been like without you. <3

← **Tweet**



Karissa @SJBsMama |WEARAMASK 🤪

#FF my main D*C evening crew and you, too, can love them forever: @BioEvilChris @chrisavellone @davidgaidler @SteveJaros

10:01 AM · Sep 7, 2012 · Tweetings Classic for iPhone

1 Retweet



EXHIBIT 4

← Tweet



Karissa 🍰 @ 🍪 🍪 🍪 🍪 |WEARAMASK 🧢
@SJBsMama

So @PhilHornshaw and I got to chat with with my buddy @ChrisAvellone for @Koobismo's In The Workshop! Check it at Koobismo.deviantart.com

5:23 PM · Nov 27, 2012 · Tweetings Classic for iPhone

1 Retweet 3 Likes



413x T0rr3s ❤️ 🏴‍☠️ @SynbiosTael · Nov 28, 2012

Replying to @SJBsMama

@SJBsMama loved the moment when he said Doctor Who and you started fangirling. Doctor Who ftw! :D




lore
tings

← Tweet

 **Karissa** 🍰 @🍪🍪🍪🍪 |WEARAMASK 🤪 @SJBsMa... · Mar 15, 2013

@BioEvilChris STOKED to see you guys!! #PAXEast #epic

1 1 1

 **Tasmen** @tasmen · Mar 15, 2013

@SJBsMama @BioEvilChris all the drinks

1 1 1

 **Karissa** 🍰 @🍪🍪🍪🍪 |WEARAMASK 🤪 @SJBsMama

Replying to @tasmen

@tasmen @BioEvilChris ALL of them. @SteveJaros and @ChrisAvellone will be in on this as well.

6:57 PM · Mar 15, 2013 · Tweetings Classic for iPhone

1 1 1 1

 **Tasmen** @tasmen · Mar 15, 2013

Replying to @SJBsMama
@SJBsMama @BioEvilChris @SteveJaros @ChrisAvellone oh lordy. @_psdo has warned me

2 1 1

 **Karissa** 🍰 @🍪🍪🍪🍪 |WEARAMASK 🤪 @SJBsMa... · Mar 15, 2013

@tasmen @BioEvilChris @SteveJaros @ChrisAvellone @_psdo The warning is due, but WORTH IT

1 1 1

← **Tweet**



Chris Avellone @ChrisAvellone · Apr 21, 2013
More Nuka Break Fun. Violent Fun.



8 10 16



Karissa @SJBsMama |WEARAMASK 🤪

Replying to @ChrisAvellone

@ChrisAvellone Raise in hotness +25

8:43 PM · Apr 21, 2013 · Twitter Web Client

3 Likes

← **Tweet**



Karissa 🍷🍷🍷🍷🍷 |WEARAMASK 🤪
@SJBsMama

@ChrisAvellone @SteveJaros If I don't see both of you very soon I'm gonna rage

7:53 PM · Jul 18, 2013 · Tweetings Classic for iPhone

2 Likes



Steve Jaros @SteveJaros · Jul 18, 2013
Replying to @SJBsMama
@SJBsMama @ChrisAvellone cosigned



← **Tweet**



David Gaider  @davidgaider · Jul 25, 2013

Currently: spoiling my dinner through poutine.

 6

 1

 3



Karissa  @      |WEARAMASK 
@SJBsMama

Replying to @davidgaider

@davidgaider Yay poutine! On a completely unrelated note, are you coming to Dragon*Con? Because drinking team. (@ChrisAvellone @SteveJaros)

4:52 PM · Jul 25, 2013 · Tweetings Classic for iPhone



David Gaider  @davidgaider · Jul 25, 2013

Replying to @SJBsMama

@SJBsMama @ChrisAvellone @SteveJaros Events have conspired to prevent me from getting away, alas.

 2



Karissa  @      |WEARAMASK  @SJBsMama · Jul 25, 2013

@davidgaider @ChrisAvellone @SteveJaros Sad!!! We shall toast many in your honor as you're away.





≡ **Explore**

⚙️ **Settings**

← **Tweet**



Chris Avellone @ChrisAvellone · Aug 1, 2013

Snafu of the day: Telling a bald guy at the gym I'd be "out of his hair" in a second.

8

7

11



Karissa @SJBsMama |WEARAMASK 🤪

Replying to @ChrisAvellone

@ChrisAvellone This is why we love you.

4:56 PM · Aug 1, 2013 · [Twitter Web Client](#)



Search

← Tweet

 **Karissa** 🍷@🍷🍷🍷🍷🍷 |WEARAMASK 🤪 @SJBsMa... · Aug 14, 2013
@GeekyFriedRice @SunriseSauna MIDORI SOURS!!! (Dauna knows my pain/love with these.)

2 2

 **Jackie the Avocado** 🥑🗣️🇺🇸 @GeekyFriedRice · Aug 14, 2013
@SJBsMama @SunriseSauna ah the midori sour. My first legal drink =P

1

 **Karissa** 🍷@🍷🍷🍷🍷🍷 |WEARAMASK 🤪
@SJBsMama

Replying to @GeekyFriedRice

@GeekyFriedRice @SunriseSauna I, uh... may or may not have had too many the first night of DCon last year. It's a great story.

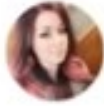
9:31 PM · Aug 14, 2013 · [Twitter Web Client](#)

1 Retweet and comment 2 Likes

Retweet Like

 **Sunrise** @SunriseSauna · Aug 14, 2013
Replying to @SJBsMama
@SJBsMama @GeekyFriedRice if you remember it, you didn't have too many. ;)

← **Tweet**



Karissa @SJBsMama |WEARAMASK 🤪

@Biofodder @GeekyFriedRice @SunriseSauna Oh, I didn't throw up. But I sure don't remember much (firsthand, anyway. Was told the next night.)

9:33 PM · Aug 14, 2013 · [Twitter Web Client](#)

1 Like



Sunrise @SunriseSauna · Aug 14, 2013

Replying to @SJBsMama

@SJBsMama @Biofodder @GeekyFriedRice LOL! Well then, success!




1





Tweet



David Gaider  @davidgaider · Aug 20, 2013

I have to be honest: I'm kinda excited to be going back to Dragon*Con again.

 14

 1

 14



Mike Capps @solidfog · Aug 20, 2013

@davidgaider we are glad to have you, but we are totally giving you a pack of smokes first.

 3



 1



David Gaider  @davidgaider · Aug 20, 2013

@solidfog I'm hoping that, by the time I get there, my snappishness will be past. You'll only need to worry about my sobriety. :)

 2



 1




Karissa  @     |WEARAMASK  @SJBsMa... · Aug 20, 2013

@davidgaider @solidfog I'm fairly sure *your* sobriety won't be the first to be concerned with... *clears throat* #ilovethesepeople

 1



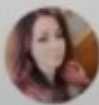
David Gaider  @davidgaider · Aug 20, 2013

@SJBsMama @solidfog All I know is, if I'm not smoking, I'm sure as hell goddamn drinking!

 1



 5



Karissa  @    |WEARAMASK 

@SJBsMama

Replying to @davidgaider

@davidgaider @solidfog THAT'S THE SPIRIT. (I'm



Search Twitter



Kathleen Kaderabek @katkaderabek · Aug 30, 2013



Day one of #dragoncon and Im already having a blast with friends, :-)
@ChrisAvellone @davidgaider @SteveJaros



1



Steve Jaros @SteveJaros · Aug 30, 2013



@katkaderabek @ChrisAvellone @davidgaider it was a great night!

1





1



Steve Jaros @SteveJaros · Aug 30, 2013



@katkaderabek @ChrisAvellone @davidgaider it was a great night!

1



Kathleen Kaderabek @katkaderabek · Aug 30, 2013



@SteveJaros @ChrisAvellone @davidgaider for sure and hopefully the rest of the weekend will be much the same :)

1



Karissa 🍷 @SJBsMama |WEARAMASK 🤪



Replying to @katkaderabek

@katkaderabek @SteveJaros @ChrisAvellone
@davidgaider BUT OF COURSE

1:53 PM · Aug 30, 2013 · Tweetings Classic for iPhone





Explore

Settings

← Tweet



Karissa @SJBsMama |WEARAMASK 🤪

HAPPY FREAKING BIRTHDAY to the dear @ChrisAvellone!!! May your friends buy all your drinks today, and have one on me. <3

10:40 AM · Sep 27, 2013 · Tweetings Classic for iPhone

1 Retweet and comment 1 Like



Jamalia @SpoonyJamalia · Sep 27, 2013

Replying to @SJBsMama
@SJBsMama @ChrisAvellone Happy birthday \o/



1





Explore

Settings

← Tweet



Mike Laidlaw @Mike_Laidlaw · Mar 13, 2014

It's come up in various places, but just to confirm: Every race and gender can be any class, except dwarves, who still have no mages.

12

25

46



Chris Avellone @ChrisAvellone · Mar 13, 2014

@Mike_Laidlaw I once said this in a PTA meeting, and it didn't go over well.

2



4



Mike Laidlaw @Mike_Laidlaw · Mar 13, 2014

@ChrisAvellone Time and a place, Chris. Time and a place. Speaking of which: PAX East?

1



2



Chris Avellone @ChrisAvellone · Mar 13, 2014

@Mike_Laidlaw No PAX East for me. Alas. Too many PTA meetings about dwarves and magery. Sigh.

3



Karissa |WEARAMASK

@SJBsMama

Replying to @ChrisAvellone

@ChrisAvellone @Mike_Laidlaw Well that's the worst news today.

10:58 PM · Mar 13, 2014 · [Twitter Web Client](#)

1 Retweet and comment 1 Like



Explore

⚙ Settings

← Tweet



Karissa @SJBsMama |WEARAMASK @SJBsMama · Apr 24, 2014

Been thinking about why I don't experience much abuse/harassment as a female gamer/cosplayer, when it seems to be so rampant. No ideas.

8 1



Karissa @SJBsMama |WEARAMASK

I'm always taken a little aback when my fellow fem gamers/nerds have story after story of abuse/harassment, because I just DON'T have my own

6:26 PM · Apr 24, 2014 · [Twitter Web Client](#)

1 Retweet and comment

🗨️ ↻ ❤️ ↗



eva #blm @_SaltedEarth · Apr 24, 2014

Replying to @SJBsMama
@SJBsMama I'm with you there! I simply haven't had it happen to me, mic on or off. Maybe we play in the less volatile communities?

1 1



Karissa @SJBsMama |WEARAMASK @SJBsMama · Apr 24, 2014
@Maas_Effect Maybe? Right timing maybe? I play lots of CoD MP though so



Explore

Settings

← Tweet



Steph @sundoll · Apr 24, 2014

@SJBsMama what kind of abuse are you referring to? as in sexual? or heckling/disapproval?



1



Karissa @SJBsMama |WEARAMASK

@SJBsMama

Replying to @sundoll

@sundoll Any of the harassment/abuse extended to female gamers simply because they're female. Not just sexual, but there's that too.

6:28 PM · Apr 24, 2014 · Twitter Web Client



Steph @sundoll · Apr 24, 2014

Replying to @SJBsMama

@SJBsMama well I have a theory on why you specifically don't get it, but it's not very PC...



1



Karissa @SJBsMama |WEARAMASK @SJBsMama · Apr 24, 2014

@sundoll Screw PC, I've never been much of one for that. XD

← **Tweet**



Karissa 🍪🍪🍪🍪🍪 |WEARAMASK 🤪 @SJBsMama · Apr 24, 2014

Been thinking about why I don't experience much abuse/harassment as a female gamer/cosplayer, when it seems to be so rampant. No ideas.

8



1



Karissa 🍪🍪🍪🍪🍪 |WEARAMASK 🤪 @SJBsMama

Replying to @Snacpack

@Snacpack @rmpeavy And, strangely enough, when it does, it's USUALLY another woman.

6:57 PM · Apr 24, 2014 · [Twitter Web Client](#)

1 Retweet and comment 1 Like



peaves 🧑🧑 @rmpeavy · Apr 24, 2014

Replying to @SJBsMama

"@SJBsMama: @Snacpack And, strangely enough, when it does, it's USUALLY another woman." YEP!!!



1



peaves 🧑🧑 @rmpeavy · Apr 24, 2014

Replying to @SJBsMama

@SJBsMama @Snacpack yes! I was going to say: I can't picture Karissa getting harassed by a MAN. annoyed by a woman...yes.



1



← **Tweet**



Karissa @ |WEARAMASK
@SJBsMama

Replying to @Snacpack

@Snacpack @rmpeavy That's the kicker with it being tricky. I don't accept it if/when it comes my way... it just rarely ever does.

6:57 PM · Apr 24, 2014 · [Twitter Web Client](#)

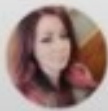
1 Retweet and comment



peaves @rmpeavy · Apr 24, 2014

Replying to @SJBsMama

@SJBsMama @Snacpack I just can't picture Karissa getting harassed- but I can picture other girls. That's because. I know she just wouldn't.



Karissa @ |WEARAMASK @SJBsMama · Apr 24, 2014

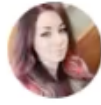
@rmpeavy @Snacpack And for whatever the reason is, you're not the only one who has said that.



peaves @rmpeavy · Apr 24, 2014

@SJBsMama @Snacpack people have said it about me too. And I say that about my mom & grandma.

← **Tweet**



Karissa 🍰@🍪🍪🍪🍪 |WEARAMASK 🧢
@SJBsMama



11 years of @Obsidian! Congraaaaats @ChrisAvellone et al! :)

1:03 PM · Jun 18, 2014 · [Twitter SMS](#)

1 Retweet 2 Likes





from:sjbsmama chrisavellone



Top

Latest

People

Photos

Videos



Karissa 🍰 @🍪🍪🍪🍪🍪 |WEARAMASK 🤪 @SJBsMa... · Aug 29, 2014

Replying to @TheEvilChris

@TheEvilChris @ChrisAvellone I missed breakfast today too, damnit!



Karissa 🍰 @🍪🍪🍪🍪🍪 |WEARAMASK 🤪 @SJBsMama · Jun 18, 2014

11 years of @Obsidian! Congraaaaats @ChrisAvellone et al! :)



1



2



Karissa 🍰 @🍪🍪🍪🍪🍪 |WEARAMASK 🤪 @SJBsMama · Jun 7, 2014

Replying to @ChrisAvellone

@ChrisAvellone @SteveJaros YOU MONSTER



1



Karissa 🍰 @🍪🍪🍪🍪🍪 |WEARAMASK 🤪 @SJBsMama · Apr 23, 2014

@GeekyFriedRice @ChrisAvellone @GUNNAROptiks Wearing mine as we speak. Because WORK FOREVER



2



Karissa 🍰 @🍪🍪🍪🍪🍪 |WEARAMASK 🤪 @SJBsMa... · Mar 13, 2014

Replying to @ChrisAvellone

@ChrisAvellone @Mike_Laidlaw Well that's the worst news today.



1



1



EXHIBIT 5



Karissa Barrows and Yorick Reyes

Participants: Karissa Barrows, Chris Avellone and Yorick Reyes

Karissa Barrows

(*salutes again* :D)

Feb 5, 2014, 2:54 PM

Chris Avellone

Hey, Yesika, pleasure to meet you! I'd be happy to answer whatever questions you'd like.

(And thanks for the intro, Karissa.)

Feb 5, 2014, 2:54 PM

Yorick Reyes

Thanks I sent a friend request! :)

Feb 5, 2014, 2:54 PM

Karissa Barrows

salutes Any time! Back to work I go :)

Feb 5, 2014, 2:49 PM

Yorick Reyes

Of course, I've heard of Chris. Wow, I didn't expect this. Thanks Karissa and thank you for taking the time Chris :)

Feb 5, 2014, 2:48 PM

Karissa Barrows

Yesika, meet the awesome Chris Avellone (if you haven't already)! You may already know he was a big part of the insanely successful Project Eternity Kickstarter a while back, and is VERY familiar with Kickstarter in general. He'd be happy to give you some tips and such, so you guys can take it from here! (Let zee friending begin!)

Feb 5, 2014, 2:48 PM



Karissa Barrows

Karissa Barrows

Isn't every release met with some anxiety? :) YES WE SHALL TALK. I'm bummed you won't be at PAX East. :(

Mar 19, 2014, 4:08 PM

Chris Avellone

Thank GOD. We will talk. We were... apprehensive about the release.

Mar 19, 2014, 3:49 PM

Karissa Barrows

YAY good. :D I've been hearing a ton of people talking about Stick of Truth just randomly around town and everybody has said they LOVE it

Mar 19, 2014, 2:33 PM

Chris Avellone

Very good! And very good for the company.

Mar 19, 2014, 2:25 PM

Karissa Barrows

How's GDC?

Mar 19, 2014, 2:20 PM

Karissa Barrows

Bahaha

Mar 19, 2014, 2:20 PM

Chris Avellone

:D

Mar 19, 2014, 2:18 PM

Chris Avellone

I aim to disappoint in the best possible way.

Mar 19, 2014, 2:18 PM

Karissa Barrows

Karissa Barrows

♥♥♥

Mar 19, 2014, 2:01 PM

Karissa Barrows

LOL that is most delayed, but awesome, response ever.

Mar 19, 2014, 2:01 PM

Chris Avellone

♥ x 2

Mar 19, 2014, 1:59 PM

Karissa Barrows

♥

Feb 5, 2014, 2:53 PM

Chris Avellone

♥

Feb 5, 2014, 2:53 PM

Karissa Barrows

Rockin! Let me set up a message on here with you two in it and the friending can go from there. You're the best!

Feb 5, 2014, 2:45 PM

Chris Avellone

Sure, tell her to drop me a line at CAvellone@obsidian.net, and I'd be happy to (or you can ask her to friend me on here). Would be happy to help out, Karissa!

Feb 5, 2014, 2:19 PM

Karissa Barrows

(Basically I'm asking if it's okay to put you two in touch. LOL)

Feb 5, 2014, 2:07 PM

Karissa Barrows

(I mean, I know you did, with Eternity, but didn't you do another one recently?)

Karissa Barrows

(I mean, I know you did, with Eternity, but didn't you do another one recently?)

Feb 5, 2014, 2:07 PM

Karissa Barrows

Heyyy frand! Didn't you run a kickstarter (or otherwise participate in one) recently? A friend of mine is throwing one in a month or two and asked if I could put in her in touch with anybody who could give her some pointers/etc.

Feb 5, 2014, 2:07 PM

Karissa Barrows

selfhighfives

Feb 27, 2013, 2:57 PM

Chris Avellone

That is very true. Good call, Karissa.

Feb 27, 2013, 2:44 PM

Karissa Barrows

Though I dare say his judgment only inspires further shenanigans.

Feb 27, 2013, 1:50 PM

Karissa Barrows

:D

Feb 27, 2013, 1:50 PM

Karissa Barrows

Pfft. Translation: "OMG CHRIS AND STEVE WITHOUT FEAR OF GAIDER JUDGMENT"

Feb 27, 2013, 1:50 PM

Chris Avellone

Translation: {Karissa, thinking with a sigh}"Oh, well, I *guess* Steve and Chris will be enough. I'll try and make the best of it."

Feb 27, 2013, 1:36 PM

Chris Avellone

Translation: {Karissa, thinking with a sigh}"Oh, well, I *guess* Steve and Chris will be enough. I'll try and make the best of it."

Feb 27, 2013, 1:36 PM

Karissa Barrows

Dangit. I'm still excited to see you and Steve though! :D

Feb 27, 2013, 11:14 AM

Chris Avellone

Steve will be there. David just told me he's not, since he's doing GDC the following week. Ah, well.

Feb 27, 2013, 10:25 AM

Karissa Barrows

Sure thing! Steve and David are going to be there too?!? Omgggg. Dragon*con part II.

Feb 27, 2013, 7:47 AM

Chris Avellone

I do appreciate the invite, though. You are nice people, Ms Barrows.

Feb 26, 2013, 10:56 PM

Chris Avellone

But... but... I can't leave Steve. And maybe Gaider. I'd be happy to meet up elsewhere, though, we'll figure it out!

Feb 26, 2013, 10:55 PM

Karissa Barrows

SWEET!! :D I'll see you there! You should go to the NerdAppropriate party on Thursday night. It's semi-secret, but awesome. I can give you my +1 if you want.

Feb 26, 2013, 5:27 PM

Chris Avellone

Hey, Karissa, I saw your question on Twitter - I'll definitely be at PAX East (I didn't want to advertise it, since last year was a bit too busy). It was a bit touch and go there with a pass, but I was able to snag one!

Feb 26, 2013, 5:26 PM

EXHIBIT 6

On Fri, Nov 6, 2020 at 4:09 PM Scott [REDACTED] > wrote:

Chris, I couldn't not write back.

I've spent some time since your last email looking through my social media for anything I may have had during the Con timeframes. I'm terrible at social media, so nothing substantial, sadly. No, there was not a point that I wanted to "beat you up". Frankly I was a bit surprised to learn I was leaned on in that regard, as a "witness". I'm certain I wouldn't have met up with you and Thuy in VA/DC and Vegas if I was looking to slap you with a white glove.

Anyway, hope things are well. Stay in touch.

Scott

On Thu, Oct 22, 2020 at 8:31 PM Chris [REDACTED] > wrote:

Scott! Thanks for writing back and I'll keep your name out of, well, anything, I just wanted to check.

As you noticed, one of the women (Kelly) specifically called you out as a witness (and claimed you wanted to beat me up), and that prompted me to cross-examine my behavior and ask your perspective, since I didn't recall that at all but I knew I could ask you and get clarity on it. I don't even remember anyone named Kelly, not because of partying, but because she doesn't look like anyone I met, but then again, I met a lot of people (including you). I also was worried I'd pissed you off, and that's one of the last things I want, since you've always been cool with me and I've enjoyed hanging out.

[REDACTED]: Yeah, I feel bad about our breakup, and have said as much, but it doesn't matter overall - we had to stop seeing each other regardless, it wasn't working out and Karissa kept texting me and interfering in it, so I felt like I was seeing two women in the same relationship, it was weird and fucked up and had to end.

Thanks for writing back. [REDACTED].

I might have more questions later on (and after you're in a calmer work place), but if so, I'll write and maybe we can chat on the phone or something more than exchanging emails. :)

Chris

On Wed, Oct 21, 2020 at 5:39 PM Scott [REDACTED] > wrote:
Hey, Chris. It's been a year, that's for sure.

I had to take some time and meditate on your email. [REDACTED], so I don't want my name in the media or put forward anywhere, please. I hate to be cold and neutral out of the gate but do need to lead with that.

Frankly, I did not witness any predatory behavior by you when we were socializing at DragonCon. I've seen David's exoneration video and was surprised to see my name appear as an ancillary account. Regarding the events I was mentioned in, I do not recall any interactions by you that were inappropriate.

Generally, when we were socializing at the Con, there was alcohol, bawdy chat and humor but otherwise, I can't say I witnessed any egregious behavior. However, I can't speak for behind closed doors and things I wasn't personally there for.

The relationship with [REDACTED] is complicated, another matter and is surely the animus source of others.

Again, I'd like to stay uninvolved. If you'd like to talk further, I believe you still have my number and I'm willing to chat, or on Hangouts, Zoom, or whatever. Hang in there, I know things are difficult and can't pretend to imagine what you've been going through. I don't keep in contact with the DragonCon crew much and certainly won't discuss your personal life.

Take care,

Scott

On Thu, Oct 15, 2020 at 5:33 PM Chris Avellone [REDACTED] > wrote:

Hey, Scott, I know it's been a while, and it's been my fault for not keeping up correspondence the last day with [REDACTED] in Vegas (which was equally my fault, it's not on him), I kind of went into hibernation and stopped corresponding with a lot of folks, including you for which I apologize.

I hate to write to you at the moment for a more serious reason, but I don't know if you heard, but Karissa Barrows (and friends) decided to attack me on social media (4-5 months ago) and accused me of sexual misconduct at Dragon*Con 6 years ago.

Karissa (who had no issues with my behavior before I dated [REDACTED], but once [REDACTED] and I were having problems and broke up, she went into full hate mode) ended up changing her story about us making out into something more predatory, which the media was quick to pounce on and distribute her allegations (they didn't bother to check any facts, they just printed her words verbatim).

I *never* violated consent with her (and she admits as much), but her allegations were enough to drop a nuclear warhead on my career I lost all my jobs pretty quickly (no company wanted to be seen as questioning her allegations) and there's been no work since.

I can understand Karisa wanting to defend Jackie as a friend, and I believe that's the biggest instigation for her attack, but it's not "defense" anymore - [REDACTED] and I broke up 4-5 years ago (partly due to Karissa's interference in our relationship, even though Karissa set me up with Jackie), and it has ceased to be a matter of "defending" [REDACTED] and more about just being vengeful for what transpired. I knew she could be angry at times, but this went above and beyond anything I could have imagined.

I'm writing because you're cited in some of the ancillary statements made by others, and while I don't want to get you involved, it would be a help to me if I could get your perspective on the events that took place.

While there is truth to some of the elements they cited (██████ and I fighting, for example, which definitely happened), there are other elements that are clearly untrue or embellishments, and it occurred to me you might be able to shed some light on them... or prove me wrong.

Again, I don't want to trouble you with this, but it's been a pretty devastating year for me (she made her allegations 5 months ago, and the wreckage is still settling) and even having someone to talk to about it would be a help.

If you'd rather not be involved, I'd understand and I hope you're doing well with all the "normal" craziness of 2020.

BTW, if you do happen to still correspond with the Dragon*Con crew, if you could not mention the problems I'm going through (I'm hurting pretty badly all around) or that I talked to you, I'd appreciate it - Karissa (also on social media) was pretty happy that I was getting savaged due to her allegations and kept posting "thanks so much!" to every company that dropped me on their roster and seemed to take pleasure in it, so I don't want to give her any added fuel by hearing that I'm suffering, if that makes sense - I'm worried it will draw her attention again.

Thanks - and hope you're well,

Chris

EXHIBIT 7

**Jacqui Collins**

I don't want to kick you out of my life really but at the same time if I don't and something like this ever happens again then it becomes my fault.

May 25, 2014, 11:41 AM

Jacqui Collins

You had suggested the SD trip before so it didn't shock me or anything.

May 25, 2014, 11:37 AM

Chris Avellone

You have the strangest friends!

May 25, 2014, 11:33 AM

Chris Avellone

I did feel crappy about your bday, though.

May 25, 2014, 11:33 AM

Chris Avellone

So as in appropriate as last night's message was, I apologize if I came across too strong on the SD trip. It was after you had canceled your bday plans and I wanted to cheer you up, but I didn't mean it in a sexual way but I can totally see how inappropriate that was, too.

May 25, 2014, 11:32 AM

Jacqui Collins

Yeah even when he went to the bathroom I was like "so this is a good time for me to slip out?" And she was like "no I want you to stay."

May 25, 2014, 11:32 AM

Chris Avellone

Okay, that is FIVE HUNDRED TIMES MORE AWKWARD.



Jacqui Collins

Apologize for what?

May 25, 2014, 11:31 AM

Jacqui Collins

She also was playing footsie with me while she was doing it. Which was more weird.

May 25, 2014, 11:31 AM

Chris Avellone

Can I apologize for something else?

May 25, 2014, 11:30 AM

Chris Avellone

Okay, that is kind of awkward.

May 25, 2014, 11:30 AM

Jacqui Collins

Oh I was out with a friend. Successfully wingmanned her and she met a dude. They were making out hardcore and I wanted to go home. But I didn't want to leave in a jarring way that would ruin the flow of what they had going on.

May 25, 2014, 11:28 AM

Chris Avellone

Oh, I had no idea what you meant by it. What does that mean?

May 25, 2014, 11:27 AM

Jacqui Collins

How do you mean?

May 25, 2014, 11:27 AM

Chris Avellone

**Chris Avellone**

I completely misunderstood 3rd wheeling exit strategy, too.

May 25, 2014, 11:26 AM

Chris Avellone

If there is a way I can make it up to you, let me know, including if you'd rather I vanish from your life. I would be sad about that but it would be deserved. :(

May 25, 2014, 11:25 AM

Chris Avellone

I completely agree.

May 25, 2014, 11:24 AM

Jacqui Collins

I have shared what you said, but not who it was that said it.

May 25, 2014, 11:08 AM

Jacqui Collins

I am glad that you apologized but it also doesn't change what you said. And I'm not ok with people believing it is ok to speak that way without someone's consent or invitation.

May 25, 2014, 11:08 AM

Jacqui Collins

I honestly am not sure of what I want to say at the moment.

May 25, 2014, 10:57 AM

Chris Avellone

There's no excuse for it, and it was disrespectful.

May 25, 2014, 10:54 AM

Chris Avellone



May 25, 2014, 10:53 AM

Jacqui Collins

Yes, I would say so.

May 25, 2014, 10:52 AM

Chris Avellone

I owe you like a hundred million apologies

May 25, 2014, 10:50 AM

Chris Avellone

I AM SO SORRY!

May 25, 2014, 10:49 AM

Chris Avellone

Or we could just talk, too. ;)

May 25, 2014, 1:24 AM

Chris Avellone

You may have to listen very hard while your hands dig into the sides of my head and force me deep into your pussy.

May 25, 2014, 1:21 AM

Chris Avellone

Come to SD and I'll explain my 3rd wheeling exit strategy by licking your pussy.

May 25, 2014, 1:20 AM

Jacqui Collins

Also I need a third-wheeling exit strategy. halp

May 24, 2014, 11:58 PM

Jacqui Collins



Jacqui Collins

BRAT

May 24, 2014, 11:44 PM

Jacqui Collins

Brat

May 24, 2014, 11:41 PM

Jacqui Collins

Don't spoil me like that I'll turn into a best

May 24, 2014, 11:41 PM

Chris Avellone

So, if you WANT to come to San Diego for your birthday, let me know, I got it covered.

May 24, 2014, 11:37 PM

Chris Avellone

Sup, Collins.

May 24, 2014, 11:36 PM

Chris Avellone

Heyyyyyyy-OOOO

May 24, 2014, 11:36 PM

Jacqui Collins

FINE

May 24, 2014, 11:14 PM

Jacqui Collins

Sup bro

EXHIBIT 8

So it's been almost a decade, and I make it to California once a year apart from this year because plague.

I saw all the stuff last month. I read the articles. I talked with [REDACTED] And I was there the year at D*Con when you met Karissa - it was when I met you both, and I remember all of that fairly vividly.

I know we haven't talked in almost a decade, but I still care about you. The way you dealt publicly with [REDACTED] wasn't okay - you tagged her and exposed her and didn't remove that even after she asked. But I'm not here to chew on you. I'm just wanting to say that I hope you're taking this opportunity to get some help. I want you to be okay. I want you to be in a good place.



1

Jul 24, 2020, 12:01 PM

A [REDACTED] I avoided social media for a long time, and I came back to find your message. Thanks, you were always kind to me, and I won't forget it.

Wed 5:26 PM ✓

A [REDACTED], I avoided social media for a long time, and I came back to find your message. Thanks, you were always kind to me, and I won't forget it.

Wed 5:26 PM ✓

I don't know if you saw (hopefully not, because it's painful enough to find this out second hand), but some of Karissa's old Twitter messages came out, and they were a complete shock to me - did you know anything about this? I was totally floored.



Who cares. :D

Oct 30, 2012, 2:09 PM

That's not that old. Is he a cool guy? Why not pursue something with him? ;)

Oct 30, 2012, 2:10 PM ✓



Oh he's awesome. So fun and a complete gentleman. I dunno, it'd be cool, but I'm not sure that's what he wants.

Oct 30, 2012, 2:11 PM

Beyond Politics, Beliefs, or Life Choices—This is About Right and Wrong

jeffdjohnson.medium.com

Anyway, I hope you are well and you are receiving the kindnesses you show on to others, you deserve it.

Wed 5:28 PM ✓

Hey! I read your account on Medium. [REDACTED] linked me. If it matters, I know your accounting is the truth. Because I was there. And I remember.

I did know some of those old ones. I remember going a little sideways with her

Hey! I read your account on Medium. [REDACTED] linked me. If it matters, I know your accounting is the truth. Because I was there. And I remember.

I did know some of those old ones. I remember going a little sideways with her on more than one of them (including the harassment one) at the time.

If you'd rather keep talking over DMs for paper trail or whatever else, I understand. If calling would be easier, you're always welcome to call me.

[REDACTED]
[REDACTED]

Wed 5:29 PM

[REDACTED]

HOLD UP HER DMS? I DIDN'T.

Wed 5:31 PM

I had no idea!

I was pretty floored

Wed 5:33 PM ✓

[REDACTED]

If you're comfortable, call me? If not, give me a second to get to my computer from my phone...

Wed 5:33 PM

No rush, I mostly wanted to say thanks for the nice message

Wed 5:33 PM ✓

No rush, I mostly wanted to say thanks for the nice message

Wed 5:33 PM ✓

Okay, on the computer (longer DMs are easier with all 10 fingers instead of just 2 thumbs)



1

Wed 5:34 PM

When I read her DM exchange with Jeff, I was totally surprised - I had no idea

Wed 5:34 PM ✓

Boys can be dumb

Wed 5:35 PM ✓

I had no clue about those DMs, but I'll tell you right now that lines up with how she talked about you to me.

Do you remember the friends that she mentioned in her accusation that checked on her afterwards?

They were [redacted] and me. We knew you were both drunk, we knew y'all had left together. We knew y'all were hot for each other, and we didn't know *you* as well (or, really, at all beyond John being a Fallout fan). She assured us things were copacetic and that you'd listened when she stopped and that she was *happy*.

I had no clue about those DMs, but I'll tell you right now that lines up with how she talked about you to me.

Do you remember the friends that she mentioned in her accusation that checked on her afterwards?

They were [REDACTED] and me. We knew you were both drunk, we knew y'all had left together. We knew y'all were hot for each other, and we didn't know *you* as well (or, really, at all beyond John being a Fallout fan). She assured us things were copacetic and that you'd listened when she stopped and that she was *happy*.

All. That. Next. Year. whenever we would talk, you inevitably came up. She referred to you constantly and consistently as "con-boyfriend" and talked to me as if you two were seeing each other. I didn't know you *hadn't* seen each other for that whole year until your Medium article.



So no, I didn't know about these DMs, but they're consistent with how she was immediately afterwards.

Wed 5:37 PM

I am so stupid, like all men, I suppose.

Ha ha ha - thanks for clearing that up, I feel like a fool. I'm not the sharpest tool in the shed.

Wed 5:37 PM ✓

Also, I mean it: I've always enjoyed your company, and I have missed you greatly. It's been *way* too long.

Also, I mean it: I've always enjoyed your company, and I have missed you greatly. It's been *way* too long.



Wed 5:38 PM

i missed you too, you were always so cool to me.

Wed 5:38 PM ✓

You're fine! You aren't stupid! We all had a lot going on, and one of the things I pegged about Karissa early on is that she's what we now call a clout chaser.



You were clout.

Wed 5:38 PM

If you want to Zoom and catch up at some point (if you're not sick of Zoom, but it's almost all I have), I'd love to hear how you're doing.

Wed 5:38 PM ✓

If you want, [redacted] and I are actually gonna be in LA the first part of August. We're both fully vaxxed. We'd both love to see you if you want to get together.

I would LOVE to!

Wed 5:39 PM

I'd love that!

Wed 5:39 PM ✓



I'd love that!

Wed 5:39 PM ✓

You just let me know when! I think you're probably busier than I am.

Sweet! I think I probably need your phone number again, unless you'd rather keep it over twitter DMs. I've changed phones a handful of times in the last decade. 😂

Wed 5:39 PM

Sure, I can send you some times, I'm actually on a very, very late lunch break right now ha ha, then back to the grind

Wed 5:39 PM ✓

We'll be out there August 4th through August 12

Pencil me in! I miss you. <3

Wed 5:40 PM

My phone's all busted, so I need to get a new one. If you tried to call, you'd probably get an angry Italian person who inherited my old number.

Wed 5:40 PM ✓

LOL!

Wed 5:40 PM

Sweet, I'll let you know. So glad to come back and see your message, I'll let you know when I escape the shackles here

A
@



Wed 5:40 PM

Sweet, I'll let you know. So glad to come back and see your message, I'll let you know when I escape the shackles here

Wed 5:41 PM ✓

Sounds good. And I meant it - I want you to be in a good place. You deserve to be. I hope you are, or that you're getting there.



Wed 5:41 PM

Thanks, A [redacted] it means a lot. <3

AIGHHHH

* A [redacted]

Wed 5:42 PM ✓

<3 Anytime. I'm glad I can call you a friend. You're a good person, Chris. You always have been.



Wed 5:42 PM

A [redacted] A [redacted] A [redacted] not A [redacted]

Wed 5:42 PM ✓

Eh, I'll take it. Close enough. ;-)

Wed 5:42 PM

dude i still have twitter dms with her too (i only *just* went back and looked)

dude i still have twitter dms with her too (I only *just* went back and looked)

do you want/need them?



Wed 5:48 PM

A [redacted] that would be amazing, yes, I;d love to see them for sure!

As for Zoom, I can do anytime this afternoon, tomorrow afternoon, or the weekend, but I don't want to interfere with your schedule, so whatever works best for you. :)

Can't tell you how much I appreciate this, I had no idea about any of this.

Thu 8:41 AM ✓

This afternoon would actually work really well for me!

Thu 9:16 AM

Sounds good, I'm on Cali time, so just let me know what time works best for you. Can't wait to catch up!

Thu 9:25 AM ✓

Wanna do 1 your time? That way you have time to eat lunch.

Thu 9:28 AM

That sounds great! I'll send you a Zoom link

Thu 9:29 AM ✓

Thu 9:28 AM

That sounds great! I'll send you a Zoom link

Thu 9:29 AM ✓

Hold on, A [redacted] getting Zoom set up, should be a few ;)

Thu 1:00 PM ✓

No worries! I'm in no rush.

Thu 1:00 PM



Join our Cloud HD Video Meeting
us02web.zoom.us

See if this works:

Thu 1:03 PM ✓

I'm in. Are you?

Thu 1:04 PM

Mind if I call you instead?

Thu 1:04 PM ✓

Not at all. Xd

Thu 1:04 PM

Screenshot bomb inbound. Just a heads up.



1

@SJBaMama

09/12/12 12:55 PM

A
@

Thu 1:04 PM

Screenshot bomb inbound. Just a heads up.



@SJBsMama



09/12/12, 12:55 PM ✓

Also, I talked to Chris yesterday for a second. Told him I randomly missed him because I was up until 3 AM for the first time since D*Con

And that the last time I had been up that late, he was there

And that I missed him being there at that hour

And he texted back and goes, "Awwwww. Trust me, that feeling would only last until the first snore. :)"

LOL. Which he also mentioned when I napped in his room the night before I left. He didn't snore. He may have stayed awake though...

GDI AIRLINE MILES :(

Keep watching the prices though. They'll go way down when it gets closer, then go up again right before

And then also, Lee Arenberg has been SUPER flirting with me. Which is awesome but strange as well, considering he's married. XD



09/12/12, 12:58 PM

Eh, maybe he's just a flirty person. I tend to be sort of flirty, truth be told.



Start a message

@SJBsMama



Chris is frustrating, you know that?
ARGH

09/14/12, 11:06 PM

Uh oh. What happened?

09/14/12, 11:14 PM ✓

OMG YAY D*CON 2013!!! Do you KNOW how epic next year is going to be? DO YOU? must get E3 credentials approved and money to go because Chris and everyone



AND YOU MUST ALSO GET E3 CREDENTIALS BECAUSE I SAID. We can get them through CO.

10/30/12, 10:05 PM

OHGODE3CREDENTIALS.
DONOTGETMYHOPESUPWOMAN.

AND YES D*C 2013. YES. AND A GOOD CHUNK OF SHENKO SISTERS ARE GOING TO BE THERE. AND *WE* ARE GOING TO BE THERE.

Hey, hate to be a nag - cause I really feel like I



Start a message



Done

Thu 2:37 PM

And it was not long after these conversations where she started implying y'all had sort of sorted things out and were sort of seeing each other. None of that happened over Twitter DMs, though.

Thu 2:40 PM

Holy fuckballs

Wow, A [REDACTED] thanks, I'm reading through these

Hey, I found some stuff on the net about the ME charity and Karissa - would you mind if I sent that to you? (It doesn't involve you, but it casts even more light on what you told me.)

Thu 2:55 PM ✓

Sure! I don't know if I'll know a ton, but feel free to send them to me.

Thu 2:59 PM

A

@



Thu 2:55 PM ✓

Sure! I don't know if I'll know a ton, but feel free to send them to me.

Thu 2:59 PM

I also do apologize for calling you a turd back then.



Thu 3:04 PM

HA HA HA HA

Thu 3:04 PM ✓

Pshhhh - don't even sweat it.

Thu 3:05 PM ✓

<3

I was sitting there screenshotting them going "W E L P"



Thu 3:05 PM

Oh my god, you're like a secret agent in these emails HA HA HA

She's even giving you the script for the intel HA HA HA This is so funny awesome

Thu 3:10 PM ✓

It was a *mess*. It was.

Start a new message



A

@



Thu 3:10 PM ✓

It was a *mess*. It was.

But...yeah. XD I'll own it.



Thu 3:11 PM

You are a good friend, I couldn't count on my friends to fish for info like this without it exploding to all hell. Well done, I never even realized!

So crafty, you are! I fear your machinations! ha ha ha ha

I love it when you two start doing the crazy all caps letters randomly

Captures the frustration/emotion perfectly

Thu 3:13 PM ✓

Y'know...I do pride myself on being good with people. I really do enjoy making connections with people.

Sometimes that means I know how to ask the right questions in the right ways without giving away that I'm fishing, true - I blame that on my Texas-bred mother who can tell someone to go to hell and have them end up asking for directions.



Thu 3:14 PM

You know for all the shit that's happened, these

EXHIBIT 9



Karissa  @     |WEARAMASK 
@SJBsMama



09/12/12, 12:55 PM ✓

Also, I talked to Chris yesterday for a second. Told him I randomly missed him because I was up until 3 AM for the first time since D*Con

And that the last time I had been up that late, he was there

And that I missed him being there at that hour

And he texted back and goes, "Awwwww. Trust me, that feeling would only last until the first snore. ;)"

LOL. Which he also mentioned when I napped in his room the night before I left. He didn't snore. He may have stayed awake though...

GDI AIRLINE MILES :(

Keep watching the prices though. They'll go way down when it gets closer, then go up again right before

And then also, Lee Arenberg has been SUPER flirting with me. Which is awesome but strange as well, considering he's married. XD



09/12/12, 12:58 PM

Eh, maybe he's just a flirty person. I tend to be sort of flirty, truth be told.



Start a message





Karissa 🍷 @👊👊👊👊 |WEARAMASK 🧐
@SJBsMama



Chris is frustrating, you know that?
ARGH

09/14/12, 11:06 PM

Uh oh. What happened?

09/14/12, 11:14 PM ✓

Nothing hugely specific. Just is clearly not interested in carrying on. Weird considering his behavior at D*C. I knew it was just-

-a con thing, but dude. Been a while since I was treated that well. In the meantime, major moves from the other front. Still strange.



09/14/12, 11:16 PM

Well, that is confusing and does suck. But what do you mean "major moves from the other front"?

09/14/12, 11:22 PM ✓

The actor front I told you about. Lol

And yes, sucks. Seems like he's interacting with everybody BUT me. Funny when it took an hour to get to my next door hotel bc he couldn't-



09/14/12, 11:24 PM

Wait. Actor front? The only actor I know about who's been flirting with you is Lee Arenberg.



Start a message





Karissa 🍷 @👊👊👊👊 |WEARAMASK 🤧
@SJBsMama



interacting with everybody BUT me.
Funny when it took an hour to get to my
next door hotel bc he couldn't-

09/14/12, 11:24 PM

Wait. Actor front? The only actor I know about
who's been flirting with you is Lee Arenberg.

09/14/12, 11:25 PM ✓



-stop stopping me to make out :/ Stupid
con things and stupid FEELS. He's 40, I
should be okay with this!

09/14/12, 11:25 PM

Unless - HOLY SHIT ARE YOU FLIRTING WITH
RAPHAEL? DID I MISS SOMETHING HUGE?

09/14/12, 11:25 PM ✓



The former, lol. I wish with Raph, dude!!
LOLLLLL

09/14/12, 11:26 PM

Well, it's **okay** to be disappointed. You've said
yourself you hate being a single mom. And he
did sort of give you some reason to hope.

So I think it's okay that you did. I think it's
normal that you did. And I'm sorry that he's
being a bit of a turd about it all.

09/14/12, 11:26 PM ✓

Don't we both wish with Raphael. Srsly.

Wait - isn't Lee married? What in this world is



Start a message





Karissa 🍷 @👊👊👊👊 |WEARAMASK 🧢
@SJBsMama



Wait - isn't Lee married? What in this world is going on? I feel all wide-eyed and confused.

09/14/12, 11:28 PM ✓

Dunno if turd. Bachelor, for sure. Way more fun for him to be w/o ties. But then why JUST me for literal ENTIRETY of D*C?? I dunno.

GAWD. If Raph. Holy shit.

And yes, he is. Hence the strange part. Think it's just Hollywood-type fling deal, nothing huge, but he's talked to me every day now



And I don't msg him first. So flattering! But weird.

09/14/12, 11:31 PM

Well, okay. Maybe turd IS a bit unfair of me, I'll admit.

BUT OH GOD HOLY SHIT IF RAPH. I was talking to a couple of friends about my audition article and said I had to tone down the fangirling, but

that ws SO FUCKING HARD, because the only thing that could have made the entire thing MORE fangirl heaven than it was was an affair with

Raphael at this point. XD

Well, that's interesting indeed.

09/14/12, 11:33 PM ✓



Start a message





Karissa 🍷 @👊👊👊👊 |WEARAMASK 🧢
@SJBsMama



LOL sounds good :)



And GDI now my Koobismo folk ship me and conboyfriend. GDIIIIII

10/30/12, 5:09 PM

First: Koobismo? And second: I warned you I already did. :-P You two were too damn precious for your own good. And I was greatly saddened

that it appeared to be just a con thing after the fact. Cause srsly.

10/30/12, 5:10 PM ✓

See koobismo.deviantart.com :) I'm doing their social media/interviews now after they begged me to come on board. XD As for Chris... *sigh*



Honestly, I'd be okay with it not being just a con thing. He's great. But I doubt that's anything he's interested in.

10/30/12, 5:17 PM



And yes, I got your email :) I'm checking through it now.

10/30/12, 5:19 PM

You ARE turning into Jacqui. :-P You ever need an assistant, just call me, yeah? ;-)

10/30/12, 5:20 PM ✓



Start a message





Karissa 🍵 @ [emojis] |WEARAMASK 🤪
@SJBsMama



10/30/12, 5:20 PM ✓



OH GAWD I LOVE JACQUI and her awesome far outweighs mine. XD

10/30/12, 5:20 PM

And as for Chris... I totally hear ya. Maybe if it rekindles at PAX East? (Will he even be there?) Or maybe he is really a confirmed

10/30/12, 5:21 PM ✓



Jeff (Koobismo second-in-command basically) keeps telling me I need to go for it because there's a shortage of great men in the world and

10/30/12, 5:21 PM

bachelor. Who knows.

10/30/12, 5:21 PM ✓



if I find one, I need to keep him. It'd be nice if Chris turned out to not be a complete bachelor/player/woman-of-the-week guy.

10/30/12, 5:21 PM

I don't disagree with that line of thinking. Just sayin'.

10/30/12, 5:22 PM ✓

But I dunno. I didn't ask him about it (like an idiot)

Uh... with... But... A... U...



Start a message





Karissa 🍷 @👊👊👊👊 |WEARAMASK 🧢
@SJBsMama



(like an idiot)

I don't either. But AGH

I refuse to be "that girl" who a dude is affectionate with for a few days and then she's latched on for life or something.



Unless that's what he wants, of course...

10/30/12, 5:23 PM

Well, maybe give it until PAX East. Do you want me to poke him and ask if he's going?

Truly, honestly? Good on you for that. You deserve better than to be "that girl".

10/30/12, 5:23 PM ✓

YES ASK HIM

If you were bold... you might also ask him how things are going with me. :P Get a feel, maybe, without letting on that we've talked about it

GDI I DON'T WANT TO BE THAT GIRL BUT DAMNIT I NEED TO KNOW WHAT'S IN THAT MAN'S HEAD

Be like, "so you and Karissa were adorable at Dragon*Con. How's that going? winknudge" or something. You know what to do. goddamnit shoot me



10/30/12, 5:26 PM



Start a message





Karissa 🍷 @👊👊👊👊 |WEARAMASK 🧢
@SJBsMama



available at DragonCon. How's that going? winknudge" or something. You know what to do. goddamnit shoot me

10/30/12, 5:26 PM

Wanting closure (or at least definitive information) doesn't make you "that girl", okay? It doesn't. Now do you think he's more likely to answer a Twitter DM or a facebook message?

10/30/12, 5:28 PM ✓

He'd answer either. It's maybe better suited for FB though, considering possibility of length... keep anything about me in private obv's



Dunno if he wants any of it public. Even though he stopped me to make out all the way from the Marriott to the Hyatt and the train station.

10/30/12, 5:29 PM

bb, I plan on keeping the whole thing private. Discretion and all.

10/30/12, 5:31 PM ✓



I know. But I'm freaking out about it so I have to say it to make myself feel better. XD

10/30/12, 5:32 PM

Message has been sent via facebook. I'm starting with just asking if he's going to be there. We'll see how that bit goes first.



Start a message





Karissa 🍷 @👊👊👊👊 |WEARAMASK 🧢
@SJBsMama



there. We'll see how that bit goes first.

(And I totally get needing to say it to make yourself feel better. I do it all the time. <3)

10/30/12, 5:34 PM ✓



I hope he's going to be there. :D

10/30/12, 5:38 PM

I sort of do, too. We'll see, though. (fingers totally crossed)

10/30/12, 5:38 PM ✓



crosses all appendages

10/30/12, 5:54 PM

Just saw th Legion cosplay post you liked on fb. You gonna get him to do D C's costume?

10/30/12, 6:14 PM ✓



Zach Pickard is going to do D.C.'s costume :) I asked Dillon, but he said he wouldn't have time. :(

10/30/12, 6:15 PM

On the one hand boo. On the other YAY THERE IS A LEGION COSTUMER!

10/30/12, 6:16 PM ✓



Exactly. :D I wasn't looking forward to finding another outside my current contacts!



Start a message





Karissa 🍷 @👊👊👊👊 |WEARAMASK 🧢
@SJBsMama



contacts!

10/30/12, 6:16 PM

Hey a little selfishly, how much work does my review need? A little? A complete overhaul? What am I looking at?

10/30/12, 6:24 PM ✓

As Seth is rampaging, I haven't had a chance to look yet (I was looking through email before). Give me an hour to get him corralled...



Side note, he was not at all disturbed or intimidated by the whole kid thing :D

10/30/12, 6:26 PM

Not being disturbed/intimidated is good at first blush. Or it could mean he intended it to be a con thing from the start. I never did get

that feel, though, for whatever that might be worth...

10/30/12, 6:29 PM ✓



Yeah. Who knows....

10/30/12, 6:30 PM

We'll find out. Don't worry. ;-)

10/30/12, 6:31 PM ✓

WHOO

OH I WILL LOVE IT 1) O...



Start a message





Karissa 🍷 @👊👊👊👊 |WEARAMASK 🧐
@SJBsMama



Okay, read it! LOVE IT. 1) Get screenshots - see some of my reviews for examples of what to do with them. 2) 5-star rating (again, see my

reviews for examples of how I do these). 3) CO standard tagline (look at my Avengers review, it'll give you a good example of all these)

Other than that, looks great! The site is down though, so I can't do shit with it yet. Or my MoH:W review, GDI...



10/30/12, 6:39 PM

Cool! And thank you. <3 at least the site being down will give me time to grab screenshots and finish up my Guild Wars Halloween event

review. XD

10/30/12, 6:41 PM ✓

LOL, for real. This is the second damn time it's been down in the past week. Fuck Brownhosting or whatever the hell we use.



10/30/12, 6:42 PM

Texting with him right now :D



10/30/12, 7:01 PM

Me: (In reference to his desire but uncertainty on going to PAX East) "You must!! Who will walk me back to my room if you don't go?"



Start a message





Karissa 🍷 @👊👊👊👊 |WEARAMASK 🤪
@SJBsMama



room if you don't go?"

Him: "This question appeals to my gentleman (and not gentleman) instincts."

SDKLGJF:SDJKHFLSKJDHFLKJSHDLG
KJHSDLKJFALJDFS

Me: "I am perfectly content with both types thereof." (ISUCKOMGWWHATSHOOTME)



10/30/12, 7:11 PM

AALAHSDHIOAHDSFGUOHGGAIOHGDSA
OMFG KARISSA

10/30/12, 7:12 PM ✓

I
KNOWSDFJAS:LKDJFSDJKHLKAJHSFL
KJHSLDFG

So hopefully he comes. And hopefully he messages you back. :D



10/30/12, 7:23 PM

He did message me back and gave the whole spiel about how he wanted to, but was uncertain, that it was fun (but Dragon*Con was MORE fun)

and said I should go anyway. I said I'd been planning on it if I could arrange travel. But that I'd never been to Boston (which he said was

great city), so I told him he needed to come. Because if he didn't, who was going to show me around Boston? So let's see if he responds



Start a message





Karissa 🍵 @👊👊👊👊 |WEARAMASK 🧐
@SJBsMama



AALAHSDHIOAHDSFGUOHGGAIOHGDSA
OMFG KARISSA

10/30/12, 7:12 PM ✓

I
KNOWSDFJAS:LKDJFSDJKHLKAJHSFL
KJHSLDFG



So hopefully he comes. And hopefully
he messages you back. :D

10/30/12, 7:23 PM

He did message me back and gave the whole
spiel about how he wanted to, but was
uncertain, that it was fun (but Dragon*Con was
MORE fun)

and said I should go anyway. I said I'd been
planning on it if I could arrange travel. But that
I'd never been to Boston (which he said was

great city), so I told him he needed to come.
Because if he didn't, who was going to show
me around Boston? So let's see if he responds
to

that or not.

10/30/12, 7:30 PM ✓

LOL, we are so twins. Hopefully he does
because REASONS



He said D*con was way better than
PAXE to me too :) Didn't specify why. Lol

10/30/12, 7:32 PM



Start a message





Karissa 🍷 @👊👊👊👊 |WEARAMASK 🧐
@SJBsMama



Got the screenshots and the edited article! :) Site is still down though. Piece of shit host. fuuuuuuu. No, but our conversation was left



at kind of an okay place to stop for the day. and SAD ABOUT IAN NOOOOOO :(

10/30/12, 9:57 PM

The site was up for all of.. an hour? IT WAS A GLORIOUS, GLEAMING HOUR, OKAY?! And yeah, I wouldn't push Chris but was just wondering, and

INORITE?! He was so fun. I was really hoping he would come and that we could drag him out for more than just one night (as that was all he

drank with us at D*C)

10/30/12, 9:59 PM ✓

Chris has like, a daily golden hour (or less) where he hits up communicating w/ the outside world. Gotta catch him there or wait till

the next day. XD Poor busy guy. : (Maybe things will change and he'll still get to come?

10/30/12, 10:01 PM

Maybe. I can certainly hope. XD

10/30/12, 10:01 PM ✓

Meanwhile I will continue to hope for



Start a message





Karissa 🍷 @👊👊👊👊 |WEARAMASK 🧐
@SJBsMama



Meanwhile, I will continue to hope for Chris's attendance so I can get some DAMN IN-PERSON CLOSURE or at least some SOME. XD

10/30/12, 10:02 PM

HA! I don't blame you. At all.

And really, I think Chris's attendance is slightly more likely than Ian's (as Ian's pretty much given me a definite no, though he has said

he'll be at D*Con 2013).
noidonothaveacrushleavemealone

10/30/12, 10:04 PM ✓

OMG YAY D*CON 2013!!! Do you KNOW how epic next year is going to be? DO YOU?
mustgetE3credentialsapprovedandmon
eytogobecauseChrisandeveryone



AND YOU MUST ALSO GET E3 CREDENTIALS BECAUSE I SAID. We can get them through CO.

10/30/12, 10:05 PM

OHGODE3CREDENTIALS
DONOTGETMYHOPESUPWOMAN.

AND YES D*C 2013. YES. AND A GOOD CHUNK OF SHENKO SISTERS ARE GOING TO BE THERE. AND *WE* ARE GOING TO BE THERE.

Hey, hate to be a nag - cause I really feel like I



Start a message



EXHIBIT 10



Karissa ☕ @✊✊✊✊ |WEARAMA...

@SJBsMama

Follow



Okay, SDCC day actual 1. Lets do this.

9:54 AM - 18 Jul 2013

4 Likes





Karissa ☕ @ 🖊️ 🖊️ 🖊️ 🖊️ |WEARAMA... ⚡

@SJBsMama

Follow



You guys. THIS SHIP. If you're at #SDCC, you HAVE to come find the #Jackdaw. #AC4

11:18 AM - 18 Jul 2013

1 Retweet 3 Likes



1



1



3



Karissa ☕ @👊👊👊👊 |WEARAMA...

@SJBsMama

Follow



@ChrisAvellone @SteveJaros If I don't see both of you very soon I'm gonna rage

4:53 PM - 18 Jul 2013

2 Likes



1



2



Steve Jaros @SteveJaros · 18 Jul 2013

Replying to @SJBsMama

@SJBsMama @ChrisAvellone cosigned



1





Karissa ☕ @ 🖊️ 🖊️ 🖊️ 🖊️ |WEARAMA... ⚡

@SJBsMama

Follow



@camharr @SteveJaros @ChrisAvellone

MUST SEE YOU AS WELL.

5:54 PM - 18 Jul 2013





Karissa 🍷 @👊👊👊👊 |WEARAMASK 🤪 @SJBsMama · 18 Jul 2013

@camharr @SteveJaros @ChrisAvellone Done and done!



Chris Avellone @ChrisAvellone · 18 Jul 2013

@SJBsMama @camharr @SteveJaros Geek and Sundry, then Machinima! Join me!



Karissa 🍷 @👊👊👊👊 |WEARAMA... 🗨️

@SJBsMama

Follow

Replying to @ChrisAvellone

@ChrisAvellone @camharr @SteveJaros
DAMNIT, where and when, sir? Grabbing
dinner and then can find you.

7:21 PM - 18 Jul 2013





Chris Avellone @ChrisAvellone · 18 Jul 2013



@SJBsMama @camharr @SteveJaros Geek and Sundry, then Machinima! Join me!



2



Steve Jaros @SteveJaros · 18 Jul 2013



@ChrisAvellone @SJBsMama @camharr ill be at g&s later! We must take to the streets!



1



1



Karissa 🍵 @👊👊👊👊 |WEARAMA... 🗡️

@SJBsMama

Follow



Replying to @SteveJaros

@SteveJaros @ChrisAvellone @camharr

YIIIISSSSSS

7:39 PM - 18 Jul 2013



EXHIBIT 11



Karissa @SJBsMama | WEARAMASK

Follow

11 years of @Obsidian! Congraaaaats @ChrisAvellone et al! :)

10:03 AM - 18 Jun 2014

1 Retweet 2 Likes



1



2

Karissa @SJBsMama | WEARAMASK

She/her, will fight you if required, need coffee. Currently on full con hiatus for health/home reasons. ANTI-FASCIST. ANTI-RACIST. BLM. RESIST

Drinking ALL of the coffee

twitter.com/sjbsmama

Joined June 2009

EXHIBIT 12



Jason Schreier @jasonscreier · 9 Apr 2019

Why, more than four years after Dragon Age: Inquisition, is Dragon Age 4 still so early in development? The answer to that question is reflective of BioWare's turbulent last few years. Here's my latest feature, about the past and present of Dragon Age:

267 1.2K 4.1K



Karissa @SJBsMama | WEARAMAMA...

Follow

Replying to @jasonscreier

Please DO NOT, @EA @bioware. One of the most beautiful things about Dragon Age is that it's a story everyone can make their own. I don't want other players having agency over the way DA4 plays for me, and I'm sure I don't speak only for myself in that regard.

multiplayer include companions that can be controlled by multiple players via drop-in/drop-out co-op similar to old-school



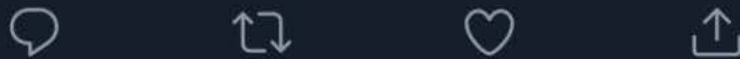
Karissa @SJBsMama | WEARAMASK @SJBsMama · 17h

While we're at it, here's another man to add to the gaming industry predator garbage pile. Yesterday was the first time I said something publicly about this, and I'm done being silent, despite that fuckstick in the reply telling me to shut up. I WILL NOT. Thread:



11:31 PM · 6/17/20 · Khoros Marketing

26 Retweets 159 Likes



Karissa @SJBsMama | WEARAMASK · 1d

Replying to @IGN

109 950 1.9K



Patrick Weekes @PatrickWeekes · 9m

Thank you for coming forward. I believe you.

1 1



Karissa @SJBsMama | WEARAMASK

@SJBsMama

Follow

Replying to @PatrickWeekes

Thank you my friend ❤️❤️❤️ (Miss you and sweet @KarinWeekes!)

By using Twitter's services you agree to our [Cookies Use](#). We and our partners operate globally and use cookies, including for analytics, personalisation, and ads.



Karissa @SJBsMama | WEARAMASK @SJBsMama · 15h

While we're at it, here's another man to add to the gaming industry predator garbage pile. Yesterday was the first time I said something publicly about this, and I'm done being silent, despite that fuckstick in the reply telling me to shut up. I WILL NOT. Thread:



11:31 PM · 6/17/20 · [Khoros Marketing](#)

26 Retweets 159 Likes



Karissa @SJBsMama | WEARAMASK · 1d

Replying to @IGN

89

703

1.3K



John Epler @eplerjc · 28m

Thank you for sharing this Karissa. I believe you.

1



4



Karissa @SJBsMama | WEARAMASK

@SJBsMama

Follow

Replying to @eplerjc

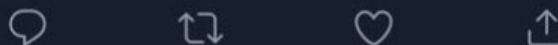



This movement has killed entertainment for the world, and the world is getting to the point where we're no longer caring.


 **Karissa ☕@☞☞☞☞|W...** · 1d

While we're at it, here's another man to add to the gaming industry predator garbage pile. Yesterday was the first time I said something publicly about this, and I'm done being silent, despite that fuckstick in the reply telling me to shut up. I WILL NOT. Thread:

[Show this thread](#)



 **Karissa ☕@☞☞☞☞|WEAR...** · 1d

 2  2  20



Allan Schumacher @AllanSchumacher · 4m

Love how his suggestion is "get him arrested" while somehow lamenting that you not doing that is destroying entertainment... 🙄

 2   2



Karissa ☕@☞☞☞☞|WEARAM...
@SJBsMama

[Follow](#)

Replying to @AllanSchumacher

What is logic 🙄

12:04 PM - 21 Jun 2020

   1

EXHIBIT 13

By using Twitter's services you agree to our [Cookies Use](#). We and our partners operate globally and use cookies, including for analytics, personalisation, and ads.



Patrick Weekes @PatrickWeekes · 4h
WE HAVE FOUR CATS RIGHT NOW



Your Cyberpunk Future @Lady8Jane

Replying to @PatrickWeekes @KarinWeekes

It's always better to get at least 2 cats as their social structure is similar to that of lions. Just thought you should know that. 🤔

13 1 106



Kelly / Stabitha (she/her)
@GlitterBroker

[Follow](#)

Replying to @PatrickWeekes

You're probably gonna have five or six real soon. 😂

9:54 PM - 29 Feb 2020

Beyond the Veil

Joined December 2009

By using Twitter's services you agree to our [Cookies Use](#). We and our partners operate globally and use cookies, including for analytics, personalisation, and ads.



Allan Schumacher

@AllanSchumacher

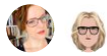
Follow



[@GlitterBroker](#) Not sure if you've already been told this, but I saw someone suggest that someone that got over the virus may be a good candidate to donate blood plasma assuming they had the illness. Would need to get tested for antibodies of course. Not sure how possible this is.

10:04 AM - 23 Mar 2020

2 Likes



1



2



Kat / Stabitha @GlitterBroker · 6h



Replying to [@AllanSchumacher](#)

Idk how true that is, it's not a blood borne virus. But I'll look into it!



1



Allan Schumacher @AllanSchumacher · 6h



I remembered reading something about this and dug up this one.

Durch die Nutzung der Dienste von Twitter erklärst du dich mit unserer [Nutzung von Cookies](#) einverstanden. Wir und unsere Partner arbeiten global zusammen und nutzen Cookies z.B. für Statistiken, Personalisierung und Werbeanzeigen.



John Epler @eplerjc · 48 Min.

Hope you all enjoyed a little taste of what we've been working on! [#dragonage](#)



Cat⁷ (she/her)

@GlitterBroker

Folgen

Antwort an [@eplerjc](#)

Who did the music, or can that not be revealed yet?

17:34 - 10. Dez. 2020



Cat⁷

@GlitterBroker

Broker of glitter. Connoisseur of bad puns & Uranus jokes. Writer, historian, game dev, artist, streamer of things.

Beyond the Veil

twitch.tv/glitterbroker

Beigetreten Dezember 2009

© 2020 Twitter [Über uns](#) [Hilfe-Center](#) [Bedingungen](#) [Datenschutzrichtlinien](#) [Impressum](#) [Cookies](#)
[Info zu Anzeigen](#)

[Datenschutzrichtlinien](#)
[Impressum](#) [Cookies](#)
[Info zu Anzeigen](#)



Cat7 (she/her) @GlitterBroker · 24 Min.

It was years ago, but I've never forgotten or forgiven what he did to my friend. His behavior has forever tainted my enjoyment of the games, bc though I can separate the man from the character, his voice reminds me of all the shitty things he's done to the BioWare family.

1 6



Cat7 (she/her)

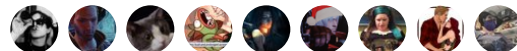
@GlitterBroker

Folgen

So yes, I'm thrilled that Mark finally told Ellis off. It's been long overdue, and frankly, I want @bioware & @ea to officially back him in this. It would go a long way towards healing the community.

11:22 - 4. Dez. 2020

12 „Gefällt mir“-Angaben



12

Durch die Nutzung der Dienste von Twitter erklärst du dich mit unserer [Nutzung von Cookies](#) einverstanden. Wir und unsere Partner arbeiten global zusammen und nutzen Cookies z.B. für Statistiken, Personalisierung und Werbeanzeigen.



Cat7 (she/her)

@GlitterBroker

Folgen



A former voice talent dragging a studio's IP into something completely unrelated.

Apparently he's using his "Cullen" voice to present some of his views *in character*. I refuse to give him the view, can anyone confirm?

Would be a shame if [@ea](#) or [@bioware](#) legal saw this. Truly.

livestreams with U.S. attorney Todd M. Lander discussing the legal issues surrounding libel, defamation & [#JusticeForJohnnyDepp](#)

Oh, may also talk about [#DragonAgeDay](#) & the cancellation of [#Cullenites](#)

Link youtu.be/6tNnFovLDnU via [@YouTube](#)



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California by JOHNSON & JOHNSON LLP, and am over the age of 18 and not a party to the within action. My business address is 439 N. Canon Drive, Suite 200, Beverly Hills, California 90210.

On July 29, 2021, I served the foregoing documents described as:

PLAINTIFF CHRISTOPHER AVELLONE'S OPPOSITION TO DEFENDANTS KARISSA BARROWS AND KELLY BRISTOL'S MOTION TO QUASH, SPECIAL MOTION TO STRIKE, AND MOTION TO DISMISS; DECLARATIONS OF JEFFREY DANIEL JOHNSON, DAUNA L. BARTLEY, AND CHRISTOPHER AVELLONE on:

BY PERSONAL SERVICE VIA MESSENGER

ROBINS KAPLAN LLP
Daniel L. Allender
DAllender@RobinsKaplan.com
Jessica Pettit
JPettit@Robinskaplan.com
2049 Century Park East, Suite 3400
Los Angeles, California 90067

Attorneys for Defendants
KARISSA BARROWS and
KELLY BRISTOL

METHOD OF SERVICE

(BY PERSONAL SERVICE VIA MESSENGER) I served the documents by placing them in an envelope or package addressed to the person(s) at the address(es) listed above and providing them to a professional messenger service for personal service.

I am employed in the office of a member of the bar of this court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct.

Executed July 29, 2021, at Beverly Hills, California.



Viktoriya Cassis