

THE STATE BAR OF CALIFORNIA  
CALIFORNIA ATTORNEY COMPLAINT FORM  
Date **12.14.11**

(1) **Sharon Noonan Kramer**  
**2031 Arborwood Place,**  
**Escondido, CA 92029**

(2) Telephone number:  
**760-746-8026**

(3) The name, address and telephone number of the attorney(s) you are complaining about. *(See note below.)*  
**Keith Scheuer, State Bar #82797**  
**4640 Admiralty Way #402,**  
**Marina Del Rey, CA 90292**  
**310-577-1170**

(4) Have you or a member of your family complained about this attorney(s) previously?  
**Yes , I complained to the State Bar beginning in February of 2009, for Mr. Scheuer repeatedly suborning his client's perjury to establish needed reason for malice in a strategic libel litigation. Ms. Nancy Brown was investigating as of April 2011. The file was transferred to San Francisco, where the reviewer made false statements in a letter written 12.06.11 then promptly retired the next day. Ms. Jill Sperber has refused to take action for the undeniable evidence of the suborning of perjury or the false statements in the State Bar letter of 12.06.11**

**I am aware there is another complaint soon to be filed against Mr. Scheuer by a Ms. Crystal Stuckey regarding Scheuer, his suborning of perjury and an interstate mailed threat of litigation he sent to Ms. Stuckey if publishes and evidences of the matter.**

(5) Did you employ the attorney?  
Answer **No**

(6) If your answer to #5 above is "**No**," what is your connection with the attorney(s)? Explain briefly.  
**He has been the attorney for Bruce Kelman & GlobalTox Inc, for over six years. He has been strategically litigating by criminal means with the assistance of the courts over a scientific fraud in policy that benefits his clients and the affiliates of the US Chamber of Commerce. Utterly amazing how politically compromised California's judicial system has become.**

(7) Include with this form *(on a separate piece of paper)* a statement of what the attorney(s) did or did not do which is the basis of your complaint. Please state the facts as you understand them. Do not include opinions or arguments. If you employed the attorney(s), state what you employed the attorney(s) to do. Sign and date each separate piece of paper. Additional information may be requested. *(Attach copies of pertinent documents such as a copy of the fee agreement, cancelled checks or receipts and relevant correspondence.)*  
**See attached complaint and six exhibits**

(8) If your complaint is about a lawsuit, answer the following, if known:  
a. Name of court *(For example, Superior or Municipal Court, and name of the county)*  
**Primarily, Fourth District Division One Appellate Court, San Diego. They suppressed evidence in 2006 when ruling on an anti-SLAPP motion, then suppressed the evidence of what they did in 2006, when denying a 2010 appeal. Highly political group of justices who do not seem to know or care about the law.**

b. Title of the suit *(For example, Smith v. Jones).*  
**Kelman & GlobalTox v. Kramer**

c. Case number of the suit  
**GIN044539/D054496**

d. Approximate date the suit was filed  
**May 6, 2005**

(9) Size of law firm complained about:  
**sole practitioner**

Signature \_\_\_\_\_

SHARON NOONAN KRAMER  
2031 Arborwood Place  
Escondido, CA 92029  
(760) 746-8026  
(760) 746-7540 Fax

**OFFICE OF THE CHIEF TRIAL COUNSEL INTAKE  
THE STATE BAR OF CALIFORNIA**

In the matter of:

BRUCE J. KELMAN & GLOBALTOX, INC.,  
Plaintiffs, (Keith Scheuer, Plaintiff Counsel) v.  
SHARON KRAMER, Defendant.

CASE NO. GIN044539

FILED, MAY 6, 2005

NORTH SAN DIEGO COUNTY SUPERIOR  
COURT,

CIVIL CASE, LIBEL ACTION

**COMPLAINT FILED AGAINST KEITH  
SCHEUER, ESQ, CALIFORNIA BAR NO.  
82797**

**ETHICS VIOLATIONS OF BUSINESS AND  
PROFESSIONS CODES 6068 & CRIMINAL  
VIOLATION OF GOVERNMENT CODE 6200**

Commingling Client Funds & Placing A Lien  
On The Opposition's Property With Interest  
Accruing From A Date Before His Clients'  
Costs Were Submitted By The Use Of A  
Falsified Judgment Document.

**I.  
COMPLAINT**

1. This complaint is against Keith Scheuer, Esq, ("SCHEUER") California Bar No. 82797. It stems from a libel action, ("KELMAN & GLOBALTOX v. KRAMER") in which there are two plaintiffs, Bruce J. Kelman ("KELMAN") and GlobalTox, Inc., ("GLOBALTOX"); and one defendant, Sharon Kramer ("KRAMER"). SCHEUER is the legal counsel for the plaintiffs, KELMAN & GLOBALTOX.

2. On January 20, 2009, SCHEUER recorded a ("LIEN") with the San Diego County Recorder on KRAMER's property for the amount of \$7,253.65 with interest accruing commencing on September 24, 2008.

3. September 24, 2008 is three weeks before SCHEUER even submitted costs to the court on October 14, 2008; with half the costs he submitted being those of his trial non-prevailing client, GLOBALTOX., and half being those of his prevailing client, KELMAN, for the total amount of \$7,252.65 (plus \$1).

4. According to the ("JUDGMENT") document on record in the Case File, SCHEUER's client, KELMAN, was awarded costs by JUDGEMENT on December 18, 2008 – not September 24, 2008.

5. On December 22, 2008, SCHEUER submitted a falsified JUDGMENT document to the administration of the court to obtain a fraudulent ABSTRACT. He then submitted the fraudulent ABSTRACT to the San Diego County Recorder to obtain a fraudulent LIEN with costs accruing from a date not possible, September 24, 2008, and with half of the interest accruing costs being those of his trial losing client, GLOBALTOX. SCHEUER is evidenced to have submitted his clients' costs, October 14, 2008. The JUDGMENT states costs were awarded on December 18, 2008, three months after the date that interest has been accruing on a \$7,253.65 LIEN, based on the fraudulent ABSTRACT submitted to the San Diego County Recorder by California licensed attorney, Keith Scheuer.

II.  
BACKGROUND

1. The sole cause of action in libel case of KELMAN & GLOBALTOX v. KRAMER is that KRAMER'S use of the phrase "*altered his under oath statements*" in an internet press release she authored in March of 2005 was a purported defaming accusation of perjury by KELMAN.

2. KELMAN is the President of the corporation, GLOBALTOX.

3. In a jury trial of August 2008, the jury found that KELMAN prevailed against KRAMER and KRAMER prevailed against GLOBALTOX. (*Attached hereto as **EXHIBIT 1** is the JUDGMENT entered as amended on October 28, 2011, stating there were two prevailing parties awarded costs, KELMAN & KRAMER and two non-prevailing parties, KRAMER & GLOBALTOX).*

4. On September 24, 2008, a JUDGMENT was entered awarding KELMAN \$1 with costs to be determined. The JUDGMENT entered did not acknowledge that KRAMER was a prevailing party. It left nowhere for her to be awarded costs. (*Attached hereto as **EXHIBIT 2** is the JUDGMENT document as it appeared on September 24, 2008, with no costs awarded to either party).*

5. KRAMER was a prevailing Pro Per. The September 24, 2008, JUDGMENT was not noticed to her as entered is required under Code of Civil Procedure 664.5(b) which governs entries of judgment and noticing of parties of entry of judgment when a prevailing party is Pro Per.

6. On October 14, 2008, SCHEUER submitted costs purportedly incurred by his prevailing client, KELMAN in the amount of \$7,252.65. (*Attached hereto as **EXHIBIT 3**, is SCHEUER'S submission of costs, October 14, 2008)*

7. Within the costs that SCHEUER submitted was \$3,895.25 for deposition costs. (See EXHIBIT 3)

8. KRAMER was only deposed once in the case and on video on January 4, 2008. The approximate cost of one full day deposition on video is \$3800.

9.. SCHEUER had two clients incurring costs for the case, including costs of the depositions. Cost attributed to KELMAN for deposition should have been \$1,947.13, which is half of the \$3,895.25 SCHEUER submitted to the court on October 14, 2008 as KELMAN's deposition costs incurred.

10. **SCHEUER commingled his clients' funds together, submitted and KELMAN was awarded costs that were incurred by SCHEUER's trial losing client, GLOBALTOX, in the amount of \$3,626.33 -- half of the total costs submitted by SCHEUER on October 14, 2008, of \$7,252.65**

11. The JUDGMENT in the Case File states on it's third page that costs were awarded by judgment to KELMAN in the amount of \$7,252.65 on December 18, 2008. (See EXHIBIT 1, page 3)

12. There were numerous irregularities in the case, post trial motions, rulings, judgments, appellate opinions, etc. For example, the Appellate Opinion of September 14, 2010, falsely states that KRAMER was awarded costs of \$2,545.28 and that a judgment had been entered in her favor. As evidenced above in EXHIBIT 1 page 3, no judgment was entered acknowledging KRAMER as a prevailing party and awarding her costs until one year later on October 28, 2011, by the lower court presiding judge, after the remittitur issued back to his court after the fraudulent Appellate Opinion.

1 13. A long, ugly, story of how politically compromised California's courts have become, the litigation  
2 continues in a second case in a court with no jurisdiction over a matter of public health and politics in  
3 the courts, nationwide. (Attached hereto as **EXHIBIT 4**, is page one of the September 14, 2010  
4 Appellate Opinion falsely stating there was a judgment entered in KRAMER's favor and she awarded  
5 her costs of \$2,545.28 prior to the issuance of the Appellate Opinion, September 14, 2010).

6 14. In June of 2011, KRAMER obtained the Register of Action ("ROA") from the case.

7 15.. The ROA states that an ("ABSTRACT") of Judgment was entered in the case on December 31,  
8 2008. (Attached hereto as **EXHIBIT 5**, is Page 36 of the ROA stating an ABSTRACT was entered on  
9 December 31, 2008.)

10 16. In June of 2011, KRAMER went to the San Diego County Recorders' Office and found that  
11 SCHEUER had recorded a ("LIEN") on her property as of January 20, 2009.

12 17. The LIEN and ABSTRACT show that SCHEUER recorded a LIEN with the County Recorder on  
13 KRAMER'S property in the amount of \$7,252.63 (plus \$1), with interest accruing commencing on  
14 September 24, 2008. (Attached hereto as **EXHIBIT 6** is the LIEN recorded on KRAMER's property  
15 with the County as submitted by SCHEUER and the ABSTRACT it is founded upon falsely stating the  
16 interest accruing amount of \$7,253.65 was awarded by judgment to KELMAN on September 24, 2008  
17 – three weeks before SCHEUER submitted costs on October 14, 2008).

18 18. **SCHEUER recorded a LIEN on KRAMER'S property with the San Diego County**  
19 **Recorder for costs incurred by his client that KRAMER prevailed over in trial, GLOBALTOX;**  
20 **with interest accruing on both KELMAN's & GLOBALTOX's costs from a period of three weeks**  
21 **before SCHEUER even submitted his clients' costs on October 14, 2008 and approximately**  
22 **three month before there was a JUDGMENT entered awarding these interest accruing costs to**  
23 **KELMAN on December 18, 2008 - according to the JUDGMENT in the Case File. (See EXHIBITS**  
24 **1, 2, 3, 5 & 6)**

25 19. Sometime after SCHEUER submitted costs on October 14, 2008, the JUDGEMENT was  
26 altered by the Clerk of the Court, Michael Garland, to add KELMAN's costs to the JUDGMENT  
27 without dating or initialing that he had made a change to the document. This made it appear that  
28 KELMAN was awarded costs of \$7,252.65 (plus \$1) on the not possible date of September 24, 2008.

20. On December 22, 2008, SCHEUER then used the Court Clerk falsified JUDGMENT and  
submitted it to the administration of the court to obtain the fraudulent ABSTRACT (See EXHIBIT 6).

21. Sometime after December 31, 2008; the fraudulent ABSTRACT was received by SCHEUER.  
He then took the document to the San Diego County Recorder to record a fraudulent LIEN on  
KRAMER's property with interest accruing from a date not possible, September 24, 2008.

22. Sometime after December 18, 2008, the Court Clerk, Michael Garland, then added his initials  
and date "mgarland12/18/08" next to the dollar amount awarded to KELMAN he had placed on the  
JUDGMENT earlier, (See page 3 of EXHIBIT 1). This made it appear December 18, 2008 was the  
date interest accruing costs were first awarded to KELMAN on the JUDGMENT in the Case File. This  
is contradictory with the ABSTRACT/LIEN that SCHEUER obtained which states interest accruing  
costs of \$7,252.65 (plus \$1) were awarded by JUDGEMENT to KELMAN on September 24, 2008.

**III**  
**DECLARATION OF SHARON KRAMER**

My name is Sharon Kramer. I reside at 2031 Arborwood Place in Escondido, California. On approximately June 20, 2011, I became aware that Keith Scheuer placed a fraudulent, interest accruing, lien on my property on January 20, 2009 with interest accruing from a date not possible to have occurred, September 24, 2008.

This lien includes costs in the amount of \$3,626.33, that were incurred by a party I prevailed over in trial who was Mr. Scheuer's client in the litigation, Globaltox, Inc. The total amount of the fraudulent, interest accruing lien recorded with the San Diego County Recorder is for \$7,253.65 with interest accruing from the not possible date of September 24, 2008.

This date of beginning accruing interest, September 24, 2008, is not possible to have occurred by a legal judgment. Mr. Scheuer did not submit his clients' costs until October 14, 2008. The costs he submitted as being incurred by his prevailing client, Bruce Kelman, is fraudulent. Half of the costs were not incurred by Bruce Kelman. They were incurred by his non-prevailing client, GlobalTox, Inc. in the amount of \$3,626.33.

The Abstract of Judgment Scheuer obtained on December 31, 2008, is fraudulent. The interest accruing lien he recorded with the county on my property on January 20, 2009, is fraudulent. The date interest began to accrue is fraudulent. Interest is accruing from a date approximately three months before costs, according to the judgment document in the case file, were awarded to Scheuer's client, Kelman, on December 18, 2008.

I am aware that the judgment document was falsified by the Clerk of the Court, Department 31, North San Diego Superior Court, Michael Garland, sometime after Mr. Scheuer submitted costs on October 14, 2008.

I am aware the Clerk of the Court added the dollar amount awarded to Kelman to the judgment document after Mr. Scheuer submitted costs on October 14, 2008; without dating or initialing the alteration made to the judgment document. This made it appear that Kelman was awarded \$7,252.65 (plus \$1) on September 24, 2008 – three weeks before Scheuer even submitted costs on October 14, 2008 (and three months before the Clerk added "*mgarland 12/18/08*" to the third page of the judgment, next to the dollar amount he had added prior without dating or initialing).

I am aware that Mr. Scheuer submitted the falsified judgment document that did not yet have the "*mgarland 12.18.08*" alteration added to it, to the administration of the court on December 22, 2008, to obtain the fraudulent Abstract of Judgment on December 31, 2008. He then took the fraudulent Abstract and recorded a fraudulent Lien on my property with the County of San Diego on January 20, 2009; and with interest accruing from a date not possible to have occurred, September 24, 2008 – September 24, 2008, is three weeks before Scheuer is evidenced to have submitted costs on October 14, 2008 and is three months before the judgment in the case file states interest accruing costs were awarded to Bruce Kelman on December 18, 2008, "*mgarland 12/18/08*". I am aware that half of the interest accruing costs recorded at the hands of Scheuer by Lien with the county of San Diego were incurred by Scheuer's trial losing client, GlobalTox, Inc.

1 I am aware that sometime after December 18, 2008, the Clerk of the Court added his initials and  
2 date "mgarland 12/18/08" next to the dollar amount he had written prior on the third page of the  
3 judgment document to make it appear December 18, 2008, was the date that Mr. Scheuer's client,  
4 Bruce Kelman, was awarded cost by judgment – making the judgment evidenced to be inconsistent  
5 with the Abstract obtained and the interest accruing Lien recorded.

6 I am aware that this is how Mr. Scheuer was able to obtain a fraudulent Abstract of Judgment and  
7 subsequently record a fraudulent interest accruing Lien on my property based on a purported date of  
8 entry of judgment, September 24, 2008, awarding interest accruing costs in the amount of \$7,253.65;  
9 by submitting the Clerk of the Court falsified judgment to the administration of the court on December  
10 22, 2008, to obtain the fraudulent Abstract on December 31, 2008 and subsequently record a  
11 fraudulent, interest accruing LIEN on my property on January 20, 2009.

12 I am aware that Government Code 6200 states, "Every officer having the custody of any record,  
13 map, or book, or of any paper or proceeding of any court, filed or deposited in any public office, or  
14 placed in his or her hands for any purpose, is punishable by imprisonment pursuant to subdivision (h)  
15 of Section 1170 of the Penal Code for two, three, or four years if, as to the whole or any part of the  
16 record, map, book, paper, or proceeding, the officer willfully does or permits any other person to do  
17 any of the following: (a) Steal, remove, or secrete.(b) Destroy, mutilate, or deface.(c) Alter or falsify.

18 I declare under penalty of perjury the foregoing is true, correct, evidenced for the California State  
19 Bar and executed by me this day of December 14, 2011, in Escondido, California.

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\_\_\_\_\_  
Sharon Noonan Kramer



FILED  
Clerk of the Superior Court

SEP 24 2008

By: M. GARLAND, Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO, NORTH DISTRICT

BRUCE J. KELMAN,  
GLOBALTOX, INC.,  
  
Plaintiffs,  
  
v.  
  
SHARON KRAMER, and DOES 1  
through 20, inclusive,  
  
Defendants.

) CASE NO. GIN044539  
) Assigned for All Purposes to:  
) HON. LISA C. SCHALL  
) DEPARTMENT 31  
) UNLIMITED CIVIL CASE  
) Case filed: May 16, 2005  
) <sup>mg.</sup> [PROPOSED] JUDGMENT  
) Trial Date: August 18, 2008  
) Department: N-31  
)

This action came on regularly for trial by jury on August 18, 2008, with Plaintiffs appearing in person and by Keith Scheuer, Esq. of Scheuer & Gillett, and Defendant appearing in person and by Lincoln Bandlow, Esq. of Spillane Shaeffer Aronoff Bandlow. A jury of 12 persons was duly impaneled and sworn, witnesses testified, and after being duly instructed by the Court, the jury deliberated and thereon duly returned the following special verdicts:

00000535



1           1.    That Defendant Sharon Kramer acted wrongly by  
2 making the following statement: "Dr. Kelman altered his under  
3 oath statements on the witness stand" while he testified as a  
4 witness in an Oregon lawsuit; that Kramer made the above  
5 statement to persons other than Kelman; that the persons to  
6 whom the statement was made reasonably understood that the  
7 statement was about Bruce Kelman; that persons who read the  
8 statement reasonably could have understood it to mean that  
9 Kelman had committed the crime of perjury or testified  
10 falsely while on the witness stand; that the statement was  
11 false; that Kelman proved, by clear and convincing evidence,  
12 that Kramer knew the statement was false, or had serious  
13 doubts about the truth of the statement; and that Kelman be  
14 awarded a monetary sum of nominal damages in the amount of  
15 \$1.00 (one dollar and no cents).

16  
17  
18           2.    That Kramer made the statement to persons other  
19 than GlobalTox, Inc., and that the persons to whom the  
20 statement was made did not reasonably understand that the  
21 statement was about GlobalTox.

22  
23           NOW THEREFORE, IT IS ORDERED, ADJUDGED AND DECREED that  
24 Plaintiff Bruce Kelman recover the sum of \$1.00 (one dollar  
25 and no cents) as nominal damages from Defendant Sharon  
26

00000531

1 Kramer, and costs in the amount of \$ 7,252.65 <sup>mganand 12/15/08.</sup>, and that  
2 Plaintiff GlobalTox, Inc. recover nothing in this action.  
3

4 Dated: 9/24/08

5   
6 Judge of the Superior Court

LISA C. SCHALL

7 OCT 28 2011 Defendant Kramer is the prevailing  
8 party as to Plaintiff Globaltox, Inc. the judgment  
9 shall include costs of \$2,545.28 in favor of  
10 defendant Kramer and as against Plaintiff  
11 Globaltox, Inc.  
12 *Wietrich*

**Case Header**

Case Number: GIN044539  
Case Title: KELMAN vs KRAMER

Filing Date: 05/16/2005  
Case Status: Pending

Case Category: Civil - Unlimited  
Case Type: Defamation

Location: North County

Case Age: 2389 days  
Next Event Type:

Judicial Officer: Earl H. Maas, III  
Department:  
Next Event Date:

**Register of Actions Notice**

ROA#	Entry Date	Short/Long Entry	Filed By
275	10/20/2011	Reply to Opposition - Other filed by KRAMER, SHARON. Refers to:	KRAMER, SHARON (Defendant)
276	10/25/2011	Tentative Ruling for Motion Hearing (Civil) published.	
277	10/25/2011	Tentative Ruling for Motion Hearing (Civil) published.	
280	10/28/2011	Judgment filed by KRAMER, SHARON. Refers to:GLOBALTOX INC	KRAMER, SHARON (Defendant)
281	10/28/2011	Judgment was entered as follows: Judgment entered for KRAMER, SHARON and against GLOBALTOX INC for \$ 0.00, punitive damages: \$ 0.00, attorney fees: \$ 0.00, interest: . \$ 0.00, prejudgment costs: \$ 2545.28, other costs: \$ 0.00, amount payable to court: \$.00, for a grand total of	
278	10/28/2011	Minutes finalized for Motion Hearing (Civil) heard 10/28/2011 01:30:00 PM.	

*This printout does not constitute a Register of Actions*



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F I L E D  
Clerk of the Superior Court

SEP 24 2008

By: M. GARLAND, Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN DIEGO, NORTH DISTRICT

BRUCE J. KELMAN,	)	CASE NO. GIN044539
GLOBALTOX, INC.,	)	Assigned for All Purposes to:
	)	HON. LISA C. SCHALL
Plaintiffs,	)	DEPARTMENT 31
	)	UNLIMITED CIVIL CASE
v.	)	Case filed: May 16, 2005
	)	
SHARON KRAMER, and DOES 1	)	<sup>mg.</sup> [PROPOSED] JUDGMENT
through 20, inclusive,	)	
	)	Trial Date: August 18, 2008
Defendants.	)	Department: N-31
_____	)	

This action came on regularly for trial by jury on August 18, 2008, with Plaintiffs appearing in person and by Keith Scheuer, Esq. of Scheuer & Gillett, and Defendant appearing in person and by Lincoln Bandlow, Esq. of Spillane Shaeffer Aronoff Bandlow. A jury of 12 persons was duly impaneled and sworn, witnesses testified, and after being duly instructed by the Court, the jury deliberated and thereon duly returned the following special verdicts:

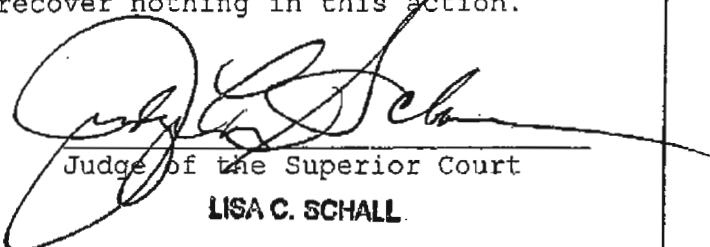
1. That Defendant Sharon Kramer acted wrongly by making the following statement: "Dr. Kelman altered his under oath statements on the witness stand" while he testified as a witness in an Oregon lawsuit; that Kramer made the above statement to persons other than Kelman; that the persons to whom the statement was made reasonably understood that the statement was about Bruce Kelman; that persons who read the statement reasonably could have understood it to mean that Kelman had committed the crime of perjury or testified falsely while on the witness stand; that the statement was false; that Kelman proved, by clear and convincing evidence, that Kramer knew the statement was false, or had serious doubts about the truth of the statement; and that Kelman be awarded a monetary sum of nominal damages in the amount of \$1.00 (one dollar and no cents).

2. That Kramer made the statement to persons other than GlobalTox, Inc., and that the persons to whom the statement was made did not reasonably understand that the statement was about GlobalTox.

NOW THEREFORE, IT IS ORDERED, ADJUDGED AND DECREED that Plaintiff Bruce Kelman recover the sum of \$1.00 (one dollar and no cents) as nominal damages from Defendant Sharon

1 Kramer, and costs in the amount of \$ \_\_\_\_\_, and that  
2 Plaintiff GlobalTox, Inc. recover nothing in this action.

3  
4 Dated: 9/24/08

  
Judge of the Superior Court

LISA C. SCHALL





ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number, and address):  
**SCHEUER & GILLET**, a professional corporation  
 Keith Scheuer, Esq. Cal. Bar #82797  
 4640 Admiralty Way, Suite 402, Marina Del Rey, CA 90292

FOR COURT USE ONLY

TELEPHONE NO.: (310) 577-1170

FAX NO.:

ATTORNEY FOR (Name): Plaintiffs Bruce Kelman and GlobalTox, Inc.

INSERT NAME OF COURT, JUDICIAL DISTRICT, AND BRANCH COURT, IF ANY:

SAN DIEGO SUPERIOR COURT, North District

PLAINTIFF: Bruce J. Kelman

DEFENDANT: Sharon Kramer

## MEMORANDUM OF COSTS (SUMMARY)

CASE NUMBER:

GIN044539

The following costs are requested:

## TOTALS

Filing and motion fees .....	1. \$	383.50
Jury fees .....	2. \$	
Jury food and lodging .....	3. \$	
Deposition costs .....	4. \$	3,895.25
Service of process .....	5. \$	104.95
Attachment expenses .....	6. \$	
Surety bond premiums .....	7. \$	
Witness fees .....	8. \$	
Court-ordered transcripts .....	9. \$	828.95
Attorney fees (enter here if contractual or statutory fees are fixed without necessity of a court determination; otherwise a noticed motion is required) .....	10. \$	
Models, blowups, and photocopies of exhibits .....	11. \$	
Court reporter fees as established by statute .....	12. \$	2,040.00
Other .....	13. \$	
<b>TOTAL COSTS .....</b>	<b>\$</b>	<b>7,252.65</b>

I, the attorney, agent, or party who claims these costs. To the best of my knowledge and belief this memorandum of costs is correct and these costs were necessarily incurred in this case.

October 14, 2008

Keith Scheuer, Esq.

(TYPE OR PRINT NAME)

(SIGNATURE)

(Proof of service on reverse)



**NOT TO BE PUBLISHED IN OFFICIAL REPORTS**

California Rules of Court, rule 8.1115(a), prohibits courts and parties from citing or relying on opinions not certified for publication or ordered published, except as specified by rule 8.1115(b). This opinion has not been certified for publication or ordered published for purposes of rule 8.1115.

COURT OF APPEAL, FOURTH APPELLATE DISTRICT

DIVISION ONE

STATE OF CALIFORNIA

BRUCE KELMAN et al.,

Plaintiffs and Respondents.

v.

SHARON KRAMER,

Defendant and Appellant.

D054496

(Super. Ct. No. GIN044539)

APPEAL from a judgment of the Superior Court of San Diego County, Lisa C. Schall, Judge. Affirmed.

In this defamation case, Sharon Kramer appeals from a judgment entered on a jury verdict finding she libeled Bruce Kelman. The jury awarded Kelman nominal damages of one dollar and the trial court awarded Kelman \$7,252.65 in costs. The jury found that Kramer did not libel GlobalTox and judgment against GlobalTox was entered. The trial court awarded Kramer \$2,545.28 in costs against GlobalTox.



**Case Header**

Case Number: GIN044539  
Case Title: KELMAN vs KRAMER

Case Category: Civil - Unlimited  
Case Type: Defamation

Case Age: 2221 days  
Next Event Type:

Filing Date: 05/16/2005  
Case Status: Pending

Location: North County

Judicial Officer: Earl H. Maas, III

Department:  
Next Event Date:

**Register of Actions Notice**

ROA#	Entry Date	Short/Long Entry	Filed By
217	12/31/2008	Abstract of Judgment issued.	
219	01/13/2009	Motion Hearing (Civil) scheduled for 03/06/2009 at 09:00:00 AM at North County in N-28 Michael B. Orfield.	
220	01/14/2009	Ex Parte scheduled for 01/27/2009 at 08:30:00 AM at North County in N-28 Michael B. Orfield.	
224	01/14/2009	Notice of Appeal filed by KRAMER, SHARON. Refers to:	KRAMER, SHARON (Appellant)
221	01/20/2009	Motion - Other (FOR DEFENDANTS COSTS) filed by KRAMER, SHARON. Refers to:	KRAMER, SHARON (Defendant)
222	01/23/2009	Ex Parte Application - Other (01/27/09) filed by KRAMER, SHARON. Refers to:	KRAMER, SHARON (Defendant)

**EXHIBIT**

**6**



7653

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, address, State Bar number, and telephone number):

Recording requested by and return to:

Keith Scheuer, Esq. Cal. Bar #82797  
SCHEUER & GILLET, a professional corporation  
4640 Admiralty Way, Suite 402  
Marina Del Rey, CA 90292  
Tel.: (310) 577-1170

☒ ATTORNEY FOR ☒ JUDGMENT CREDITOR ☐ ASSIGNEE OF RECORD

SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Diego

STREET ADDRESS: 325 S. Melrose Drive

MAILING ADDRESS:

CITY AND ZIP CODE: Vista, CA 92081-6627

BRANCH NAME: North County Division

PLAINTIFF: Bruce Kelman

DEFENDANT: Sharon Kramer

FOR RECORDER'S USE ONLY

CASE NUMBER:  
GIN044539

**ABSTRACT OF JUDGMENT—CIVIL  
AND SMALL CLAIMS**

☐ Amended

FOR COURT USE ONLY

1. The ☒ judgment creditor ☐ assignee of record applies for an abstract of judgment and represents the following:

a. Judgment debtor's

Name and last known address

Sharon Kramer  
2031 Arborwood Place  
Escondido, CA 92029

b. Driver's license no. [last 4 digits] and state:

c. Social security no. [last 4 digits]:

d. Summons or notice of entry of sister-state judgment was personally served or

mailed to (name and address): Sharon Kramer, 2031 Arborwood Place, Escondido, CA 92029

☒ Unknown  
☒ Unknown

2. ☐ Information on additional judgment debtors is shown on page 2.

4. ☐ Information on additional judgment creditors is shown on page 2.

3. Judgment creditor (name and address): Bruce Kelman  
c/o Veritox, Inc., 18372 Redmond-Fall City Rd  
Redmond, Washington 98052

5. ☐ Original abstract recorded in this county:

a. Date:

b. Instrument No.:

Date: December 22, 2008

Keith Scheuer, Esq.

(TYPE OR PRINT NAME)

(SIGNATURE OF APPLICANT OR ATTORNEY)

6. Total amount of judgment as entered or last renewed:  
\$7,253.65

10. ☐ An ☐ execution lien ☐ attachment lien is endorsed on the judgment as follows:

a. Amount: \$

b. In favor of (name and address):

7. All judgment creditors and debtors are listed on this abstract.

8. a. Judgment entered on (date): September 24, 2008

b. Renewal entered on (date):

9. ☐ This judgment is an installment judgment.

11. A stay of enforcement has

a. ☒ not been ordered by the court.

b. ☐ been ordered by the court effective until (date):

12. a. ☒ I certify that this is a true and correct abstract of the judgment entered in this action.

b. ☐ A certified copy of the judgment is attached.



This abstract issued on (date):

DEC 31 2008

Clerk, by Plasencia, Deputy

PLAINTIFF:	CASE NUMBER:
DEFENDANT:	GIN044539

# NAMES AND ADDRESSES OF ADDITIONAL JUDGMENT CREDITORS:

13. Judgment creditor (name and address):

14. Judgment creditor (name and address):

15. ☐ Continued on Attachment 15.

## INFORMATION ON ADDITIONAL JUDGMENT DEBTORS:

16. Name and last known address

Driver's license no. [last 4 digits]  
and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (address):

17. Name and last known address

Driver's license no. [last 4 digits]  
and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (address):

18. Name and last known address

Driver's license no. [last 4 digits]  
and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (address):

19. Name and last known address

Driver's license no. [last 4 digits]  
and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (address):

20. ☐ Continued on Attachment 20.



DOC # 2009-0024903



JAN 20, 2009 4:18 PM

OFFICIAL RECORDS  
SAN DIEGO COUNTY RECORDER'S OFFICE  
DAVID L. BUTLER, COUNTY RECORDER  
FEES: 15.00

PAGES: 3



RECORDING REQUESTED BY AND  
WHEN RECORDED MAIL TO:

Keith Scheuer, Esq. Bar #82797  
SCHEUER & GILLET  
4640 Admiralty Way, Suite 402  
Marina Del Rey, CA 90292

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ABSTRACT OF JUDGMENT