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

8 BRUCE J. KELMAN

9 Plaintiff,

10 v.

11 SHARON KRAMER, and DOES 1 through 20,
12 inclusive,

13 Defendant.

Case No. 37-2010-00061530-CU-DF-NC

**DECLARATION OF SHARON KRAMER IN
SUPPORT OF MOTION TO NULLIFY VOID
TEMPORARY INJUNCTIVE RELIEF ORDER**

The Honorable Thomas Nugent Presiding
Department 30

Motion Hearing Date: October 14, 2011, 1:30
PM

Complaint Filed on November 4, 2010

There is no Trial Date Scheduled for this Case

14 1. One cannot obtain an ("ABSTRACT") of Judgment without first having a judgment in hand
15 under Code of Civil Procedure 664 which states, "In no case is a judgment effectual for any purpose
16 until entered".

17 . 2. Plaintiff Bruce ("KELMAN") submitted no reply to Sharon ("KRAMER")s Motion to Nullify the Void
18 Temporary Injunctive Relief Order. He does not deny the irrefutable evidence that he obtained an ABSTRACT
19 on December 31, 2008, that states interest accruing costs of \$7,252.65 were awarded to him on a judgment
20 document on September 24, 2008. This is not possible. His costs were not in the Case File until October 20,
21 2008.

22 3. This is in direct conflict with the Amended Judgment ("FAKE JUDGMENT DOCUMENT"), he submitted to
23 this court on November 4, 2010; as the sole foundation for this case, and which makes it appear costs were
24 originally written on the judgment document on December 18, 2008.

25 4. In oral argument of July 15, 2011, this court threatened to sanction Defendant Sharon ("KRAMER") and
26 stated that it was frivolous of her to request the production of documents evidencing when KELMAN became
27 aware of a purported Amended Entry of Judgment document first written to award costs on December 18,
28

1 2008. (\$7,252.65 mgarland 12/18/08). (Attached hereto as **EXHIBIT 1**, is this court threatening to sanction
2 KRAMER for requesting the production of documents evidencing when SCHEUER and KELMAN were made
3 aware of the “mgarland 12/1808” added to the judgment document)

4 5. Given that KELMAN and his legal counsel, SCHEUER, submitted for an (“ABSTRACT”) of Judgment on
5 December 22, 2008, with the ABSTRACT issued on December 31, 2008 and stating the interest accruing
6 amount was awarded on September 24, 2008; there is nothing frivolous of KRAMER needing to evidence
7 what the judgment document looked like when SCHEUER submitted for the ABSTRACT and the ABSTRACT
8 was issued. Obviously, it is not the same form as submitted to this court as the sole foundation for this case.
9 “\$7,252.65 mgarland 12/12/08”.

10 6. Which is it, Courts? Interest accruing costs were written on the judgment document on September 24,
11 2008? (not possible, KELMAN’s costs were not submitted until October 16, 2008) Or was the dollar amount
12 first awarded by judgment on December 18, 2008? (apparently not before the ABSTRACT was issued on
13 December 31, 2008, which would explain why it is not in the Register of Action as being entered on that date).

14 7. As stated in KRAMER’s Motion To Nullify, KRAMER is providing a portion of the transcript of oral
15 argument before the Appellate Court on June 17, 2010. The following are statements made by KRAMER and
16 supported by the evidence in the Case Files,

17 Judge: “Welcome back. You can have a seat and we’ve been, we’ve been in a change of panel and
18 Justice Huffman is, is our new addition...”

19 Kramer: “...There are two technical things, first of all, is there’s one the, Mr. [SCHEUER] only has one
20 party disclosed as an interested party to this litigation, this appeal. There’s actually five additional
21 people have a financial interest in this appeal and they, they are together they are the six owners of
22 Veritox. It’s Bryan Hardin, Coreen Robbins, Lonny Swenson, Robert Schriebe, Robert Clark and
Bruce Kelman.

23 Mr. Scheuer tells me that I currently have an interest accruing lien on my home for costs that were
24 incurred by a party I prevailed over that were awarded to Mr. Kelman. It took me, I had to motion
three times to be recognized as a prevailing party....

25 So by the time Judge Dato awarded me, acknowledged in a ruling that I was a prevailing party entitled
26 to some of my costs, but I don’t have a judgment to that because he said that he couldn’t redo the
27 judgment of a prior judge. So that’s why there are six parties to this. I have a ruling that I should be
entitled to my costs against Veritox and they have a judgment for the costs they were not entitled to.

1 ...So I, I didn't get it until he had already sub-, he, he was submitting his costs middle of October when
2 the ruling was issued in September. Anyhow, what I'm trying to make a long story short, on October
3 16th is when this was mailed out, the judgment with somebody filled in the numbers of what Mr.
4 Scheuer had submitted as costs. I, I have a background in real estate so I know that it's, I don't
5 believe that it's actually a, like a legal contract because nobody dated or initialed when they filled in
6 the number for the ruling.....The post-trial motions were heard on December 12th and if you look at
7 the record, it looks like the ruling was entered on that day too. But if you look at the oral arguments,
8 Judge Shaw had me mail out the ruling and when we left that day, I said so what do I do? Do I mail
9 'em out? She said, no wait. I have to think about this. This is not verbatim. I have to think about this,
10 about you being entitled to costs. So the, the ruling was mailed to me on the 16th, so the 15th of
11 December is the date and, and January 14th puts me at 29 days."

12 (*Attached hereto as **EXHIBIT 2**, is a portion of the transcript of oral argument before the appellate court, June*
13 *17, 2010)*

14 8 In oral argument of July 15, 2011, this court stated it was frivolous of KRAMER requesting KELMAN
15 produce documents to corroborate his sole claim of why KRAMER would harbor malice for him, as it was
16 never made to be corroborated in KELMAN & GLOBALTOX v KRAMER, Case No. GIN044539. (*Attached*
17 *hereto as **EXHIBIT 3** is the court stating it is frivolous that this court be evidenced it is relying on prior*
18 *improvidently entered orders of other courts, who all suppressed the evidence of a plaintiff committing perjury*
19 *to establish malice.)*

20 9 Like all courts before this one, never mentioned in any ruling, KRAMER has repeatedly evidenced for this
21 court that all courts to oversee KELMAN & GLOBALTOX v. KRAMER suppressed her evidence that KELMAN
22 committed perjury to establish needed reason for malice while strategically litigating. There is nothing
23 frivolous about courts suppressing evidence of a plaintiff's criminal perjury to establish needed reason for
24 malice when litigating over a matter of public health; and then filing a new lawsuit based on a FAKE
25 JUDGMENT DOCUMENT to silence of what the courts have done. This is particularly true, when the court
26 knows it has costs the defendant all she owns to defend the truth of her words for the public good, BECAUSE
27 thecourts repeatedly rewarded criminal perjury, etc. (*Attached hereto collectively as **EXHIBIT 3**, is the*
28 *direct evidence that KELMAN committed perjury to establish malice, SCHEUER repeatedly suborning it, and*
all courts suppressed the evidence.

A.) KELMAN's declarations stating a testimony he never gave in Mercury v. Kramer as found in
KRAMER'S Appellate Appendix.

1 B.) SCHEUER'S Briefs stating this never given testimony was the reason for KRAMER's malice as
2 found in KRAMER'S Appellate Appendix.

3 C). Declaration of John Richards, Esq stating KELMAN was only deposed once in Mercury v. Kramer
4 as found in KRAMER'S Appellate Appendix.

5 D) The transcript of KELMAN's deposition in its entirety from Mercury v. Kramer as found in
6 KRAMER'S Appellate Appendix.

7 E). Letter sent from KELMAN July 2002, stating he was not qualified to testify to the safety of the
8 Kramer home for KRAMER'S daughter with Cystic Fibrosis as found in KRAMER'S Appellate
9 Appendix.

10 F.) Declarations from William J. Brown III, Esq. as found in KRAMER'S Appellate Appendix.

11
12 11. It is the duty of this court under Canons of Judicial Ethics to see that California licensed attorney, Keith
13 Scheuer, is punished for obtaining an Abstract of Judgment based on a date of entry of judgment that he
14 knows is in violation of CCP 664.5(b); and then knowingly using that judgment to place a lien on my property
15 with interests accruing from a date he knows is fraudulent, as it is weeks before he even submitted costs.
16 Disciplinary Responsibilities, Canon 3(D)(2) states, "*Whenever a judge has personal knowledge that a lawyer*
17 *has violated any provision of the Rules of Professional Conduct, the judge shall take appropriate corrective*
action."

18 12. **I have absolutely no intention of being bullied and harassed into silence by the courts, their**
19 **clerks, members of the Judicial Council of California and the Commission on Judicial Performance**
20 **while lives continue to be ruined and the California Court Case Management System is used to aid to**
21 **defraud the public and aid insurer fraud.** (Attached hereto as **EXHIBIT 4**, is communication with Judicial
22 Council Member and Clerk of the Fourth District Division One Appellate Court, Mr. Stephen Kelly, October 5,
23 2011)

24 I declare under penalty of perjury the foregoing is true and correct to the best of my knowledge and
25 submitted by me this day under the laws of California.

26 _____
27 Date

Sharon Kramer, Pro Per.