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

5 BRUCE J. KELMAN & GLOBALTOX, INC.,
6 Plaintiffs,

CASE NO. GIN044539

7 v.

8
9 NOTICE of Hearing, MOTION TO VACATE THE VOID
10 JUDGMENT RENEWED BY CORRUPTION OF THE
11 ROA; Memorandum of Points & Authorities; &
12 Declaration of Sharon Noonan Kramer

13 SHARON KRAMER, and DOES 1
14 through 20, inclusive, Defendants.

15 William Litvak, Esq. for Plaintiff(s)
16 Dapeer, Rosenblit & Litvak, LLP

17 Assigned for All Purposes to Hon. EARL H. MAAS, III
18 Department 28

19 The Hon. Peter Deddeh,
20 Presiding Judge San Diego Superior Court
21 Michael Roddy, CEO San Diego Superior Court
22 (parties responsible to correct the corrupted ROA)

23 Case Origin, May 2005
24 Motion Hearing Date: October 5, 2018 1:30 PM

25 To All Parties, their Attorney of Record, San Diego Superior Court Presiding Judge and San Diego
26 Superior Court CEO; please take Notice that on October 5, 2018 at 1:30 PM in Department 28 of the North
27 San Diego County Superior Court, located at 325 S. Melrose Drive in Vista, this MOTION TO VACATE THE
28 VOID JUDGMENT RENEWED BY CORRUPTION OF THE ROA will be heard by Judge Earl Maas III.

9/12/18

Sharon Noonan Kramer

MOTION TO VACATE THE VOID JUDGMENT RENEWED BY CORRUPTION OF THE ROA

21 This Motion is filed in accordance with C.C.P. 683.170.(b). This court holds no subject matter
22 jurisdiction to use deputy clerks' 2018 fraudulent, backdated Register of Action (ROA) entry #300 and 2018
23 fraudulent, backdated Case History entry to facilitate the renewal of the Void Judgment that does not state by
24 decree that Sharon KRAMER prevailed over GLOBALTOX, Inc. the August 2008 trial.

25 This court knows that the "amended" Void Judgment was created ten years ago (12.18.08) by extrinsic
26 fraud of a deputy clerk, inconsistent with jury verdict and the clerk's trial judge's 12.12.08 Minute Order which
27 states KRAMER prevailed over GLOBALTOX in trial. Kulchar v. Kulchar 1 Cal.3d 467 (1969) 462 P.2d 17, 82

28 Cal. Rptr. 489

9/12/18

Sharon Noonan Kramer

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MEMORANDUM OF POINTS & AUTHORITIES

1. In an August 2008 trial presided over by Judge Lisa Schall in the North San Diego County Superior
2 Court, Plaintiff Bruce KELMAN prevailed over Defendant Sharon KRAMER. Defendant Sharon KRAMER
3 prevailed over Plaintiff GLOBALTOX, Inc.

4. The Minute Order of 12.12.08 accurately states the two prevailing parties of KELMAN and KRAMER.
5 The judgment was improperly amended by court deputy clerk Michael Garland on 12.18.08 to make it falsely
6 appear that KELMAN and GLOBALTOX were decreed to be the prevailing parties. The fraudulent amendment
7 was not in the ROA. KRAMER was not noticed of it. KELMAN's & GLOBALTOX's attorney Keith Scheuer was
8 sent the amended Void Judgment by Garland. Scheuer submitted it back to the court for abstract recording on
9 12.22.08. (Attached as Exh 1¹ collectively are the 12/12/08 Minute Order, the conflicting 12.18.08 amended
10 Void Judgment, the ROA with no mention of it & Scheuer's 12.22.08 submission for abstract recording)

11. In September of 2010 the Fourth District Division One Court of Appeal (4th/1st) sneakily left the
12 amended Void Judgment in effect that did not state KRAMER prevailed over GLOBALTOX in trial. To quote:

13 "The trial court with a different trial judge, heard Kramer's cost motion on April 3, 2009, and
14 awarded her a total of \$2,545.28" [by ruling only]...on the record we cannot disturb the trial court's
15 award of costs to Kelman...**Judgment affirmed. Respondents** to recover their costs on appeal."

16. There were no "Respondents" disclosed on appeal. KELMAN was the only "Respondent". The 4th/1st
17 was made aware of extrinsic fraud in the lower court with the amended Void Judgment. They left in effect while
18 fraudulently making it appear that the "Respondents" of KELMAN & the five additional GLOBALTOX owners
19 prevailed in trial and on appeal. (Attached as Exh 2² is KRAMER'S statement of the case on appeal).

20. A. The September 14, 2009 Certificate of Interested Persons disclosing only one "Respondent",
21 Bruce Kelman, as accepted as accurate by Appellate Clerk, the late Stephen Kelly.

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TO BE FILED IN THE COURT OF APPEAL		APP-008
COURT OF APPEAL	APPELLATE DISTRICT, DIVISION	Court of Appeal Case Number: 4th Civil Case No. D054496
ATTORNEY OR PARTY WITHOUT ATTORNEY (name, State Bar number, and address): Keith Scheuer, Esq. Cal. Bar # 082797 heuer & Gillett, 4640 Admiralty Way, #402, Marina Del Rey, CA 90292		Superior Court Case Number: GIN044539
TELEPHONE NO. 310 577-1170 FAX NO. (OPTIONAL):		FOR COURT USE ONLY
EMAIL ADDRESS (OPTIONAL): ATTORNEY FOR (name) Respondent Bruce J. Kelman		Court of Appeal Fourth District
APPELLANT/PETITIONER: Sharon Kramer		FILED
RESPONDENT/REAL PARTY IN INTEREST: Bruce Kelman		SEP 14 2009
CERTIFICATE OF INTERESTED ENTITIES OR PERSONS		Stephen M. Kelly, Clerk
Check one: <input checked="" type="checkbox"/> INITIAL CERTIFICATE <input type="checkbox"/> SUPPLEMENTAL CERTIFICATE		REBUTTY

1 Exh 1 How the "amended" Void Judgment came to be via extrinsic fraud: <http://freepdfhosting.com/cbf11dedbc.pdf>

2 Exh 2 How the "amended" Void Judgment was used by Judges Pressman & Dato prior to the 4th/1st sneakily leaving it in effect.
<http://freepdfhosting.com/f4a953a957.pdf>

1 5. In 2011, Judge Earl Maas III ruled that the judgment should be amended to acknowledge that
2 KRAMER prevailed over GLOBALTOX. On October 28, 2011, the judgment was amended to state so.
3 (Attached here to as Exh 3³ is the judgment as amended by Judge Maas).

4 6. Yet, seven years later on July 17, 2018 the Void Judgment was renewed in its pre-amended form by
5 application of William Litvak, Esq.-- with Judge Earl Maas presiding and enabling it. (Attached hereto as Exh
6 4⁴ is the Void Judgment as renewed in its pre-amended form, consistent with Garland's fraudulent amended
7 Void Judgment of 12.18.08 that the appellate court left in effect; and Judge Maas's 7.16.18 ruling enabling it.)

8 7. Judgments must be renewed every 10 years to remain viable and to have their resultant liens
9 continue to accrue interest. They must match the electronic case file to be renewed. KELMAN attempted to
10 renew the Void Judgment on 2.20.18 which fraudulently did not state that KRAMER prevailed over
11 GLOBALTOX. He was not able to as the Void Judgment was not supported by the electronic case file.

12 294 02/20/2018 Renewal of Judgment - Application for Entry
13 submitted by KELMAN, BRUCE J rejected on
14 02/20/2018.
15 Refers to:

16 KELMAN, BRUCE J (Plaintiff)

17 8. So KELMAN hired Mr. Litvak to renew it. Shortly after he hired Mr. Litvak and the renewal application
18 was submitted on May 31, 2018; a court records clerk backdated fraudulent ROA Entry #300 into the record in
19 early June 2018 (to make it appear to have been there since 9.24.08) to facilitate the Void Judgment's
20 CRIMINAL renewal in violation of Government Codes 6200 and 6201, and Penal Code 134.

21 300 09/24/2008 Judgment was entered as follows: Judgment
22 entered for KELMAN, BRUCE J and against
23 KRAMER, SHARON for \$ 1.00, punitive damages:
24 \$ 0.00, attorney fees: \$ 0.00, interest: \$ 0.00,
25 prejudgment costs: \$ 7252.65, other costs: \$ 0.00,
 amount payable to court: \$.00, for a grand total of
 \$ 7253.65.

26 9. KRAMER is aware that the electronic Case History has also been newly corrupted. It fraudulently
27 states that as of 9.24.08, it was determined that GLOBALTOX prevailed in the trial. A court records clerk let
28 this slip on August 31, 2018. (People cannot see what the courts do with the stealth Case History. It is not
 available for public, litigant, or attorney viewing. Most do not even know it exists and can impact their cases).
 The fraudulent Case History entry was confirmed by the North County Court Records Supervisor, Tina, on
 August 31, 2018. She told KRAMER they were "directed" to make the (fraudulent) electronic record entries.

27 ³ Exh 3 Judge Maas's useless 10.28.11 amendment to the forever Void Judgment after appeal b/c of "MGarland 12/18/08" on its 3rd
 page (being used to try to permanently enjoin me in the 2nd case). <http://freepdfhosting.com/1d16258ec9.pdf>

28 ⁴ Exh 4 Litvak's Maas-enabled 7.17.18 Renewed Void Judgment in conflict w/Maas's 10.28.11 amendment to the Void Judgment.
 <http://freepdfhosting.com/7e8ce5b80c.pdf>

10. Michael Roddy is CEO of the San Diego Superior Court. He has been asked to cause the lawful
1 removal of fraudulent ROA entry #300 to facilitate Judge Maas's lawful vacating of the renewed Void
2 Judgment, on October 5, 2018. (Attached hereto as Exh 5⁵ is what Mr. Roddy knows of the relentless case-
3 fixing of this matter to defraud the public via usages of his deputy clerks' falsified court documents and
4 electronic case files for TEN YEARS; and his acknowledgment that it is *his* responsibility to assure the records
5 are accurate.)

6
7 11. Peter Deddeh is the Presiding Judge of the San Diego Superior Court. KRAMER asked him to
supervise according to Rules of the Court, to assure that Mr. Roddy causes the removal of the fraudulent ROA
8 entry #300 to facilitate Judge Maas's lawful vacating of the newly renewed Void Judgment on October 5, 2018.
9 (Attached as Exh 6⁶, is KRAMER'S request that Deddeh do his job according to Rules of the Court as the
10 Presiding Judge of the San Diego Superior Court.)

11
12 12. This is a defamation case – a fixed SLAPP suit over a matter impacting U.S. public health and safety.
13 In 2005, KRAMER exposed how GLOBALTOX got their junk science marketed into policies, so it could be
14 used to commit insurer fraud in U.S. toxic torts. For thirteen years officers of the San Diego Superior Court
15 and Appellate Court have been working in concert with GLOBALTOX's attorney, Keith Scheuer, and their
16 president, Bruce KELMAN, to frame KRAMER as libeling the owners of GLOBALTOX. For ten years, the
harassment and framing has been committed by use of the Void Judgment.

17
18 13. The case-fixing became so abusive that in 2012, with Judge Thomas Nugent presiding (in the second
case where the Void Judgment from the first was used to feign court subject matter jurisdiction) they tried to
19 literally terrorize KRAMER into silence by jailing her for refusing to sign a false confession of being guilty of
libel. She became physically ill from the experience. In 2013, in the second case with Judge Robert Dahlquist
20 III presiding, they threatened to deem KRAMER a vexatious litigant if she did not stop begging the courts to
21 stop criminally harassing her with the Void Judgment that is purposed to defraud the public.
22

23
24 14. The purpose of the ongoing case-fixing and terrorizing by Void Judgment is to **CAUSE** the insurer
fraud scam that KRAMER exposed, to continue from coast to coast. It is a multi-billion-dollar scam based on
25 GlobalTox's junk science, that harms thousands of people. The entire scam hinges upon the (renewed) Void

27
28 ⁵ Exh 5 (Some of) what Mr. Roddy knows of the ongoing case-fixing by Void Judgment to defraud the public; and his deputy clerks
falsifying court documents & electronic records to facilitate it. <http://freepdfhosting.com/7f4498b104.pdf>

⁶ Exh 6 Request that Deddeh lawfully make Roddy lawfully remove ROA #300 so Maas must lawfully vacate the renewed Void
Judgment on October 5, 2018. <http://freepdfhosting.com/a760612d28.pdf>

1 Judgment remaining criminally unvacated in ongoing criminal SLAPP-fixing. Contrary to the fraudulent court
2 documents and electronic records as just renewed, the jury found that KRAMER did NOT libel the owners of
3 GLOBALTOX, Inc. (in her 2005 writing exposing how they got their junk science marketed into policies to
4 CHEAT in toxic torts – subject writing of this entire 13 year fixed SLAPP litigation).

5 15. To the best of KRAMER'S knowledge this matter is the largest, most deadly ongoing, single crime
6 still occurring in the California courts, involving the most case-fixing jurists and clerks. The (renewed) Void
7 Judgment remaining criminally unvacated is the glue that keeps the case-fixing hidden from public light.

8 16. The appellate court being infiltrated by an apparent "*cabal of corrupt judges*"⁷ (who have blatantly
9 fixed their appellate opinions and will not recall their remittiturs to correct their willful legal errors); does not
10 give *this court* legal authority or legal obligation to CAUSE the criminal harassment by renewed Void Judgment
11 to continue via the usage of fraudulent court documents and fraudulent ROA entries that were backdated into
12 the lower court electronic record in 2018. England v. Hospital of the Good Samaritan 14 Cal.2d 791 (1939)⁸

13 17. Like the presiding officer of this court, San Diego Superior Court CEO Michael Roddy and Presiding
14 Judge Deddeh do not have legal authority to allow extrinsic fraud and falsification of electronic records by
15 superior court deputy clerks to be collusively used by judges to criminally case-fix (via facilitating the renewal
16 of the "amended" Void Judgment). Adams v. Commission on Judicial Performance 10 Cal.4th 866 (1995) 897
17 P.2d 544, 42 Cal. Rptr.2d 606

18 18. Judge Deddeh appears to want to send KRAMER on a wild goose chase of going to the appellate
19 court to stop the harassment by Void Judgment. But the involved appellate court justices cannot cause this
20 court to vacate the renewed Void Judgment without spotlighting that they have been criminally case-fixing with
21 a Void Judgment for years to cause the massive insurer fraud scam to continue (for now thirteen years by
22 framing whistleblower, KRAMER, for libel with the Void Judgment that they knowingly left in effect and have
23 repeatedly obstructed it from being vacated). KRAMER has repeatedly motioned for them to correct their legal
24 errors and direct the lower court to vacate the Void Judgment to no avail.

25
26 ⁷ MetNews, Oct 2001 <http://www.metnews.com/articles/mcco100401.htm> "McConnell Confirmed to Fourth District Court of Appeal
27 Panel Rejects Corruption Charge After JNE Member Calls It 'A Lot of Noise'" DiMare claimed McConnell has been investigated by the
FBI and was a target of the investigation which resulted in Judges G. Dennis Adams and James Malkus being convicted of fraud and
racketeering, and Judge Bruce Greer resigning and entering a guilty plea..... Huffman called the corruption allegations "outrageous"
and "scurrilous."

28 ⁸ If it were me, I would be very mad at 4th/1st Justices McConnell, Aaron, Benke, Huffman, Irrion and Dato who left me holding the bag.

1 19. The 4th/1st justices' unlawful acts do not enable or justify lower court jurists, clerks and attorneys
2 committing more unlawful acts while case fixing together with fraudulent ROA entries, falsified court
3 documents, and the unvacated/renewed Void Judgment.

4 20. "A Void Judgment Is Subject to Attack At Any Time, Either Directly or By Way of an Independent
5 Action in Equity" *Rochin v. Pat Johnson Manufacturing*, 79 Cal.Rptr.2d 719 (1998) 67 Cal.App.4th 1228 "A
6 'final' but void order can have no preclusive effect. "A void judgment [or order] is, in legal effect, no judgment.
7 By it no rights are divested. From it no rights can be obtained. Being worthless, all proceedings founded upon
8 it are equally worthless. It neither binds nor bars any one." *Bennett v. Wilson* (1898) 122 Cal. 509, 513-514, 55
P. 390.

CONCLUSION

10 The renewed Void Judgment must be lawfully vacated by act of the presiding officer of this court, the
11 Superior Court Presiding Judge and the Superior Court CEO; as it is the criminal lynch-pin which causes the
12 insurer fraud scam (that KRAMER exposed thirteen years ago) to continue to harm thousands. It is the
13 fraudulent legal instrument which enables GLOBALTOX owners to abuse KRAMER under the color of law for
14 telling the truth about their junk science and the case-fixing on their behalves by justices and clerks in the
15 4th/1st, and judges and clerks the Superior Court.

16 This court knows it is a Void Judgment because this court ordered it to be amended in 2011 to state
17 that KRAMER prevailed over GLOBALTOX – inconsistent with how it was just renewed on July 17, 2018 which
18 fails to state the truth of the jury verdict and the trial court's judgment of 12.12.08.

19 Submitted with all respect due,

20 
21 Sharon Noonan Kramer

22 DECLARATION OF SHARON NOONAN KRAMER

23 **PLEASE STOP** criminally framing me as libeling the owners of GlobalTox, Inc. (now Veritox, Inc.) with
24 the newly renewed Void Judgment and matching falsified, facilitating, electronic case records -- which fail to
25 state by decree that the jury found I did not libel the GlobalTox owners; and the trial judge found the same in her
12.12.08 Minute Order. So did Judge Maas in his October 25, 2011 ruling and ignored October 28, 2011
amendment (after appeal) to the Void Judgment.

26 I get it. Speak with One Voice takes precedence over the Constitution and the law when judges and
27 justices are caught blatantly case fixing. No one is concerned of being held accountable because no one
28 prosecutes case-fixing jurists when they case-fix together; thus no one involved in case fixing must be
concerned about being prosecuted.

But, thirteen years of relentless SLAPP-fixing for well-connected and prolific lying toxic tort expert defense witnesses (whose clients are toxic tort defense attorneys for insurers and government agencies) should not be jointly abetted to become a twenty-three-year-fixed-case by the presiding officer of *this court*, the Presiding Judge of the San Diego Superior Court, and the CEO of the San Diego Superior Court. For God sakes, people are dying from this ongoing case-fixing.

I am now 62 years old. My husband is now 67. We cannot withstand ten more years of the relentless harassment, abuse of power, and fear of what GlobalTox owners, their attorneys, and the courts will do to me/us next. This matter has already driven us into poverty. I have already been physically hurt once for refusing silence of the relentless case-fixing to defraud the public with the Toxic Void Judgment.

I can't take ten more years of constantly looking over my shoulder; having fraudulent liens accruing interest on our property; and watching environmentally disabled people being horrifically cheated, discriminated against, and unable to obtain viable medical attention from mislead U.S. physicians by the newly renewed Toxic Void Judgment going criminally unvacated.

I did nothing wrong. I told the truth of a massive insurer fraud scam based on the junk science of GlobalTox that is harming thousands – and I tried to stop it for my fellowman. Not only is it criminal, it is MORALLY WRONG that my husband and I should receive a life-sentence of harassment by renewed Void Judgment via joined unclean hands in the California courts, for my doing so.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and this declaration is executed by me on September 12, 2018 in Escondido, California.

9/12/18 Sharon Noenan Kraemer