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IN THE CIRCUIT COURT FOR THE STATE OF OREGON FOR COOS COUNTY

KEELA JEAN WALLACE,
Petitioner,
vs.
STEVEN ANDREW MAYER,
Respondent.

Case No. 25CN00972

**MOTION TO APPEAR AND SHOW
CAUSE; POINTS AND
AUTHORITIES (EX PARTE)**

Petitioner Keela Jean Wallace hereby moves the Court for an Order directing Respondent Steven Andrew Mayer to appear and show cause as to why Mayer should not be held in contempt of court for failing to comply with this Court's Amended Limited Judgment RE: Temporary Relief dated July 2, 2024, and the General Judgment of Dissolution of Case No. 24DR03804 Marriage dated October 24, 2024. This Motion is based on the records and files of this case, ORS 33.015-33.155, ORS 18.270, the Declarations of Emily Sarah Hill and Keela Jean Wallace filed herewith ("Hill Decl." and "Wallace Decl.," respectively), and the following Points and Authorities.

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POINTS AND AUTHORITIES

The Court entered an Amended Limited Judgment RE: Temporary Relief on July 2, 2024. Under that Amended Judgment, Petitioner was to “manage all aspects of Smoke on the Water, LLC.” On July 7, 2024, Respondent filed a federal copyright application claiming full ownership of the LLC’s logo. (Ex. 1 to Hill Decl.) The United States Copyright Office granted Respondent’s application on October 17, 2024. (Ex. 1 to Hill Decl.) In fact, the LLC had held a contest and ultimately hired a company to design a logo for the LLC. Ownership of that logo was transferred to the LLC. A true copy of the Design Transfer Agreement is attached to the Hill Decl. as Exhibit 2. While Respondent signed the Design Transfer Agreement, he did so as a member of the LLC. Moreover, while he originally paid for the transfer of the logo out of his personal funds, the LLC later reimbursed him. As this Motion will further explain, Respondent has attempted to use his ownership of the logo to extort Petitioner into granting him an interest in the business after October 24, 2024, when the Court entered the General Judgment of Dissolution of Marriage, as leverage for him not to appeal the General Judgment or sue Petitioner for copyright infringement, and to cajole Petitioner into saying that she perjured herself in the domestic relations proceedings.

The Amended Judgment also restricted the parties from texting more than twice if the other party did not respond to such texts. Respondent violated this order. Exhibit 1 to the Wallace Decl. reflects this disregard for the Court’s authority. This exhibit contains one

1 week's worth of text messages. Respondent texted Petitioner three times on October 4, 2024,
2 and eight times on October 9, 2024 and October 10, 2024. At one point, Petitioner requested
3 that Respondent not text her at 10:30 p.m., Respondent texted "Bruh, it's a text message.
4 You can ignore it." (Ex. 1 to Wallace Decl., Page 7) These texts are reflective of a pattern of
5 contact in violation of the Court's Amended Judgment. There are dozens more that have
6 been omitted here in the interest of judicial efficiency. Respondent's disregard for the
7 Court's authority in applying for a federal copyright reflecting sole ownership of the logo
8 created for the LLC, coupled with his excessive contact with Petitioner constitute contempt
9 of court.
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12 Additionally, the Court's General Judgment of Dissolution of Marriage divided the
13 assets and liabilities of the LLC in relevant part:
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15 "i. Wife shall be awarded 100% ownership of the business known as Smoke on the
16 Water, LLC... as her sole and separate property, free from any estate, right, title or interest
17 of Husband, subject to paying Respondent his 25% share as set forth below.
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19 ii. Husband shall immediately sign any bill of sale, title, or other conveyance
20 document necessary to release his interest in the business known as Smoke on the Water,
21 LLC."
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23 The United States Copyright Office granted Respondent's copyright application on
24 October 17, 2024, one week before the Court's General Judgment. Rather than conveying the
25 copyright ownership of the logo to Petitioner, Respondent has held the logo hostage in order
26 to extort Petitioner into granting him a role in the business, in exchange for him not

1 appealing the General Judgment or suing Petitioner for copyright infringement, resulting in
2 thousands of dollars in needless court fees, and trying to manipulate Petitioner into saying
3 that she perjured herself during the domestic relations process. (Exhibit 2 to Wallace Decl.)
4 For instance, Respondent indicated “I also officially have the federal copyright certificate for
5 the logo. I don’t care about the logo and would freely sign it over to you if we could be done.
6 But if we’re going to appeal, that’s definitely not going to happen. You’ll literally never own
7 the rights to the logo if it goes to appeal.” (Exhibit 2 to Wallace Decl., Page 1) On another
8 occasion, he emailed “You don’t even own the fucking logo, buddy. At the end of the day,
9 I’m going to sue for lost profits, and the business is going to continue to underperform.”
10 (Exhibit 2 to Wallace Decl., Page 7) Exhibit 2, Pages 8 through 11 of the Wallace Decl.
11 contain similar threats. As a result of these threats, Petitioner has not been able to market the
12 LLC or to use the logo in connection with product development for fear that Respondent will
13 file a suit for copyright infringement against her.
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18 Defendant’s flagrant conduct constitutes contempt of court. Plaintiff respectfully
19 requests the Court grant sanctions under ORS 33.105 as follows:
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- 21 1. Punitive sanctions in the amount of \$10,000 in connection with Respondent’s
22 copyright application for the LLC’s logo and his continued use of his fraudulent
23 ownership to sabotage Petitioner’s business and personal interests;
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- 25 2. Punitive sanctions in the amount of \$1,500 for Respondent’s excessive contact in
26 violation of the Amended Judgment;

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3. Remedial sanctions in the amount of \$500 each day that Respondent does not transfer ownership of the logo to Petitioner; and
4. Petitioner's attorney fees in the amount of \$2,500 incurred in connection with the filing of this Motion.

DATED this 28th day of February, 2025.



EMILY S. HILL (OSB No. 043152)
Of Attorneys for Keela Jean Wallace
Law Office of Emily S. Hill, P.C.
2251 Ridgeway Drive
Eugene, OR 97401
(541) 344-2174
emily@hilloregonlaw.com