



IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

FEB - 9 2022

RICK WARREN
COURT CLERK

45

CHRISTOPHER AVELLONE,

Plaintiff,

v.

KELLY RAE BRISTOL

Defendant.

Case No. CJ-2021-4340

The Honorable Anthony L. Bonner

REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF
MOTION TO DISMISS BY
DEFENDANT KELLY RAE BRISTOL

Pursuant to 12 O.S. § 2022, Defendant, Kelly Rae Bristol (“Bristol”) respectfully requests that the Court take judicial notice of the following documents:

1. **Exhibit 1** – a true and correct copy of the complaint filed on June 16, 2021 by Christopher Avellone against Karissa Barrows and Kelly Bristol in the Superior Court for the State of California, Count of Los Angeles: *Avellone v. Barrows*, Case No. 21STCV22573.

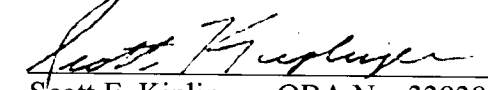
2. **Exhibit 2** – a true and correct copy of publicly posted “tweets” from the account “@Christopher Avellone”

Judicial notice is proper where a fact is “not subject to reasonable dispute in that it is either: 1., Generally known within the territorial jurisdiction of the trial court; or 2. Capable of accurate and ready determination by resort to sources whose accuracy cannot reasonably be questioned.” 12 O.S. 2011 § 2022; *see also Indep. Sch. Dist. # 52 of Oklahoma Cty. v. Hofmeister*, 2020 OK 56, ¶ 22, 473 P.3d 475, 486 (“Some federal courts have stated a court may take judicial notice of an indisputably accurate fact on the world

wide web (or internet), and public records and government documents available from reliable sources on the internet, such as websites run by governmental agencies may be used for the purpose of judicial notice.” (citations omitted)).

Dated: February 9, 2022.

Respectfully submitted,



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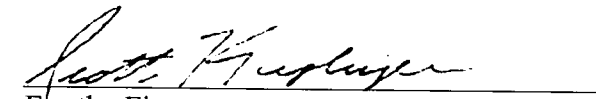
Attorney for Defendant
Kelly Rae Bristol

CERTIFICATE OF SERVICE

I hereby certify that on February 9, 2022, a true and correct copy of the foregoing was sent via U.S. Mail, postage prepaid, to the following counsel of record:

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For the Firm