Filed in District Court State of Minnesota 04/21/2025

I, Madeline Lee, affirm under penalty of perjury that the following is a true and accurate rebuttal addressing the Motion to Vacate filed by Kellye Strickland (also known as OnionAnne Sundar or Onion Madder) against the Harassment Restraining Order (Case No. 62-HR-CV-24-963), initially granted in my favor on December 12, 2024, by Ramsey County.

From December 2023 to May 2024, I was involved in a romantic relationship with Kshitij Dhyani, a resident of New Delhi, India. My work regularly involves traveling to India approximately once per year since 2021, conducting research on informal labor economies and sex work. Previously, I collaborated with a filmmaker based in Kolkata before undertaking independent projects. Throughout these visits, I established various friendships online, notably with Aravind Dinesh of Bangalore, India.

In November 2022, following a serious safety threat during my film project in Kolkata, I sought refuge at Aravind's residence in Bangalore. There, Aravind pressured me into non-consensual sexual activities. Initially, I struggled to articulate my discomfort, but later confronted Aravind, who acknowledged and apologized for his misconduct. Initially, only two individuals were aware of this incident: Viswesh Rammohan and later, Kellye Strickland, who contacted me approximately a year after to question if I had accused Aravind publicly. Privately, I informed her about the violation but explicitly stated I had no intention of publicly exposing him.

In April 2024, during my subsequent research trip to India, I experienced controlling and emotionally unstable behavior from my partner Kshitij Dhyani. This behavior culminated on May 23, 2024, when Kshitij publicly defamed me on social media, falsely accusing me of promiscuity, fraud, sex work, and child endangerment. These baseless claims significantly harmed my professional and personal reputation, leading me to engage attorney Fidel Sebastian of New Delhi to pursue legal action against Kshitij.

Around May 24, 2024, Kellye Strickland messaged my friend Neelanjan Akuli and posted publicly on my Facebook, explicitly admitting to encouraging Kshitij to contact Child Protective Services (CPS) against me. (Refer to Exhibit A) Initially downplaying her involvement, she later openly confirmed orchestrating CPS interventions, resulting in two investigations—Ramsey County on June 10, 2024, and Hennepin County on July 3, 2024—both of which were promptly dismissed. (Refer to Exhibit B)

On July 19, 2024, I discovered through my friend Shivaprasad Nair that Kellye was privately messaging numerous friends and professional contacts of mine, including Shivam Bahuguna, Tirtharaj Dhar, Abdul Rafie Siddique, Alex Rehman, Viswesh Rammohan, Tushar Roy, Vasant Kalal, Neelanjan Akuli, and Mohammad Saleem un Nazar, repeating defamatory accusations and seeking further information. Recognizing the escalating severity, I blocked Kellye on all platforms. On July 20, 2024, Kellye intensified her harassment campaign, publicly accusing me of sexual assault, financial scams, and child abuse without evidence, causing extensive emotional trauma and professional damage. (Refer to Exhibit C)

On July 27, 2024, Kellye sent me abusive messages via WhatsApp, prompting immediate blocking. (Refer to Exhibit D) On July 29, she publicly declared intentions to escalate harassment, specifically targeting my employment. (Refer to Exhibit E)

On August 7, 2024, Kellye explicitly stated her intent to "ruin my whole entire life" on Reddit's LegalAdviceIndia forum. (Refer to Exhibit F) On August 8, she reiterated false allegations of sexual assault and child endangerment in WhatsApp messages sent to my parents. (Refer to Exhibit G) On August 16, Kellye explicitly threatened "tit-for-tat" retaliation via direct SMS for any legal or protective actions I pursued. Concurrently, she targeted my attorney, Fidel Sebastian, with racially charged harassment, explicit insults, and threats, openly declaring her objective to inflict financial harm by forcing me into costly legal battles in Arizona. (Refer to Exhibit H)

On August 17, 2024, Kellye publicly disclosed my phone number, name, and city on Facebook, resulting immediately in a fraudulent Craigslist ad causing me to receive extensive unwanted contacts, necessitating an immediate change of my phone number. (Refer to Exhibit I) Soon afterward, I experienced unsolicited home visits from Jehovah's Witnesses, specifically requested online despite my well-known Jewish identity, representing further targeted harassment.

On August 18, Kellye sent a falsified cease and desist letter addressed to Fidel Sebastian, never directly delivered to me, listing an outdated Mesa, Arizona address Kellye had already vacated months prior. This action clearly indicated her knowledge of my existing harassment restraining order petition and her deliberate attempt to evade service. (Refer to Exhibit J)

Kellye persistently contacted over 150 of my acquaintances, repeatedly defaming me as a "lying rapist" and explicitly expressing hopes that I would die, lose custody of my daughter, or commit suicide, as communicated to individuals such as J Michael Johnston. (Refer to Exhibit K)

The harassment restraining order was lawfully granted to me on December 12, 2024. Despite her denials, Kellye publicly admitted awareness of my filing by August 29, 2024, contradicting her claims that I fabricated or delayed my petition. (Refer to Exhibit L)

In late January 2025, Kellye reignited her harassment after encountering an old viral post of mine, publicly accusing me of identity theft, slandering me repeatedly online, and subsequently making additional threatening contact with my mother on February 2, 2025. (Refer to Exhibit M)

Around February 25, 2025, Sumit Sinha independently contacted Kellye respectfully seeking clarity regarding her accusations prior to meeting me personally. Kellye falsely portrayed this exchange as harassment instigated by me. (Refer to Exhibit N)

Immediately thereafter, Kellye launched another racist and defamatory public attack against Fidel Sebastian, falsely alleging rape threats. After I released screenshots of her racist slurs and violent threats to warn the community, someone unconnected to me shared these with her husband, Skanda Vishnu Sundar. Kellye and Skanda wrongly accused me of directly sending these screenshots, as reflected in Skanda's retaliatory restraining order (later dismissed) and Kellye's conciliation court lawsuit. Kellye's reposting of these screenshots blaming others for her

behavior resulted in widespread community backlash, for which she incorrectly held me responsible. (Refer to Exhibit O)

On February 27, 2025, Kellye explicitly threatened on social media to travel to Minneapolis to physically assault me, causing significant fear for my physical safety. (Refer to Exhibit P)

Kellye's pattern of retaliatory actions included legal filings by her husband (dismissed on April 3, 2025), conciliation court claims seeking financial damages, and various unfounded formal complaints against legal officials, organizations, and third parties questioning her narrative.

In summary, the existing harassment restraining order remains essential due to Kellye Strickland's demonstrated and documented ongoing harassment, defamatory actions, retaliatory legal maneuvers, and threats to my safety and that of my family. Her Motion to Vacate lacks merit and credibility, undermined by extensive evidence and her own documented contradictions. I respectfully request the court to deny her motion, maintaining the protective measures currently in place.

Respectfully submitted,

Madeline Lee

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